INTRODUCTION

The United States Air Force (USAF) is issuing this Record of Decisions (ROD) for the F-35A Operational Beddown for the Air National Guard (ANG) Environmental Impact Statement (EIS) (Federal Register, Vol. 85, No. 40, EIS No. 20200051, page 11986, February 28, 2020) in deciding F-35A Operational Beddown 5 and 6 locations. In making these decisions, the information, analyses, and public comments contained in the F-35A Operational Beddown for the Air National Guard Final EIS along with other relevant matters were considered.

This ROD is prepared in accordance with the Council on Environmental Quality (CEQ) regulations implementing the National Environmental Policy Act (NEPA) at Title 40 Code of Federal Regulations (CFR) Section 1505.2, (Record of decision in cases requiring environmental impact statements). The USAF and National Guard Bureau (NGB) are the Lead Agencies and the Federal Aviation Administration (FAA) participated as a cooperating agency.

Specifically, this ROD:

- States the USAF’s decisions (page 2);
- Identifies alternatives considered by the USAF in reaching the decisions (page 2) and specifies the alternative considered to be environmentally preferable (page 3);
- Identifies and discusses relevant factors that were considered in making the decisions among the alternatives and states how those factors entered into its decisions (page 3); and
- States whether all practicable means to avoid or minimize environmental harm from the selected alternatives were adopted, and if not, why they were not adopted, and summarizes the applicable mitigation (see pages 5 through 8).

DECISION SYNOPSIS

The USAF will, by these decisions, beddown 18 F-35A Primary Aircraft Authorized (PAA) and 2 Back-up Inventory (BAI) under the NGB for both Operational Beddowns 5 and 6. For these operational beddowns, five alternative locations were considered in the Final EIS:

- The 115th Fighter Wing (115 FW) at Dane County Regional Airport in Madison, Wisconsin;
- The 124th Fighter Wing (124 FW) at Boise Airport, Boise, Idaho;
The 125<sup>th</sup> Fighter Wing (125 FW) at Jacksonville International Airport, Jacksonville, Florida;

- The 127<sup>th</sup> Wing (127 WG) at Selfridge Air National Guard Base, Michigan; and
- The 187<sup>th</sup> Fighter Wing (187 FW) at Montgomery Regional Airport, Montgomery, Alabama.

The USAF has decided to base the F-35As with associated construction at the 115<sup>th</sup> Fighter Wing (115 FW) at Dane County Regional Airport in Madison, Wisconsin for the 5<sup>th</sup> Operational Beddown and at the 187<sup>th</sup> Fighter Wing (187 FW) at Montgomery Regional Airport, Montgomery, Alabama for the 6<sup>th</sup> Operational Beddown. Subsequent to construction, delivery of the F-35A aircraft is anticipated to occur between April 2023 and June 2024. These decisions are distinct from one another and will proceed independently.

**BACKGROUND**

The federal mission of these ANG units is to support the USAF by maintaining well-trained, well-equipped units available for prompt mobilization during wartime and to provide assistance during national emergencies. As such, the ANG must acquire and train with the current USAF aircraft including the F-35A. To support the USAF, the ANG must operate combat and support aircraft and train personnel for the job according to the training requirements established by Air Combat Command through its Ready Aircrew Program. The purpose of the Proposed Action is to efficiently and effectively maintain combat capability and mission readiness as the ANG faces deployments for conflicts abroad and provides for homeland defense. Beddown and operation of the F-35A at two of the five alternative locations represents a major step toward meeting the purposes of the proposed actions. These beddown actions and associated training ensures the availability of combat-ready pilots in the most advanced fighter aircraft in the world.

**ALTERNATIVES CONSIDERED**

As more fully described in the Final EIS (Vol I, page 2-17 thru 2-21, § 2.3), the USAF and NGB followed the Air Force Strategic Basing process to identify the enterprise of bases under consideration, requirements, and basing criteria. Any location with the following attributes was included in the enterprise of bases under consideration:

- an Air National Guard location, a unit that currently supports a fourth generation fighter aircraft mission,
- a runway of at least 8,000 feet in length,
- units that are not formal training units (FTUs), and
- the installation had to be located in the contiguous U.S. (CONUS).
These attributes described in the Final EIS (Vol I, § 2.3.1) and approved by the Secretary of the Air Force, yielded a defined enterprise of 18 alternative installations to be evaluated for the 5th and 6th Operational Beddowns. The evaluation considered mission, capacity, environmental considerations, and cost criteria to reduce the 18 alternative installations to five reasonable alternatives to be evaluated in this Final EIS.

The No Action Alternative was also evaluated, in which case the F-35A would not be beddown at any of the five alternative locations (see Final EIS, Vol I, page 2-22, § 2.3.5).

**ENVIRONMENTALLY PREFERRED ALTERNATIVE**

Of the alternatives considered, the environmentally preferred alternative is the No Action Alternative. Under the No Action Alternative, no F-35A operational aircraft would be based at any of the five ANG alternative locations, no F-35A personnel changes or construction would be implemented, no additional Active Duty Associate Unit would be created, and no training activities by F-35A operational aircraft would be conducted. Under the No Action Alternative, the NGB would continue to conduct their current mission using existing, legacy aircraft with multiple aircraft configurations.

**BASIS OF DECISION**

The 115 FW and 187 FW were selected for the F-35A operational beddown based on operational parameters and cost. The 115 FW and 187 FW currently each have 18 PAA F-16C/D aircraft and these basing actions will replace those aircraft with 18 PAA and 2 BAI F-35A aircraft which will require construction and a modest increase in manpower authorizations.

**PUBLIC INVOLVEMENT**

Public involvement was integral to the USAF’s development of this EIS. Public and agency comments were received and considered, including those received during public scoping, at the Draft EIS public meetings, and during the public comment period on the Draft EIS. Additional comments were received during the post Final EIS publication 30-day waiting period, were fully considered in making these decisions and made a part of the administrative record. Comments on the Final EIS included those related to noise, environmental justice, safety, and perfluorooctane sulfonate (PFOS)/perfluorooctanoic acid (PFOA). These comments were similar to those received during the Draft EIS public comment period and addressed in the Final EIS. Responses to comments on these subjects can be found in Final EIS Volume II, Appendix A6 under Comments #4, 6, 9, 19 and 24b.
Information reflecting public involvement associated with the five basing alternative locations for the F-35A can be found in the Final EIS (Final EIS, Section 1.6). Furthermore, Final EIS Volume II, Appendix A provides public involvement documentation as well as a summary of comments received during the Draft EIS public comment period and responses to those comments. Public notices and meetings included:

- **Notice of Intent**: Published February 7, 2018 in the Federal Register, Volume 83, Number 26, page 5408.
- **Scoping Period**: Initiated February 7, 2018 and ended April 6, 2018. During this time, scoping meetings were held near each of the five installations in Wisconsin, Idaho, Florida, Michigan, and Alabama.
- **Draft EIS Notice of Availability**: Published August 9, 2019 in the Federal Register, Volume 84, Number 154, page 39296.
- **Public Comment and Review Period**: An 85-day comment period ending November 1, 2019.
- **Public Meetings on the Draft EIS**: During the public comment and review period, five meetings were held near each of the five installations in Wisconsin, Idaho, Florida, Michigan, and Alabama.
- **Final EIS Notice of Availability**: Published in the Federal Register on February 28, 2020, Volume 85, Number 40, page 11986. This publication initiated the mandatory 30-day waiting period prior to ROD signatures.

**AGENCY COORDINATION AND CONSULTATION**

As set out more completely in the Final EIS (Volume II, Appendix A), the USAF coordinated and consulted with federal and state agencies and Federally Recognized Tribes (Tribes). The federal and state agencies responsible for relevant resources (cultural, biological, etc.) were contacted early in the environmental planning process and received USAF notification of the project in February 2018. The descriptions that follow below describe the consultations associated with selected alternatives for the F-35A beddown actions.

Regulatory consultations associated with these USAF decisions included informal consultation with the U.S. Fish and Wildlife Service (USFWS) under Section 7 of the Endangered Species Act. The USAF determined, through informal consultation with the USFWS, that there are no federally threatened or endangered species in the regions of influence at the 115 FW installation or the 187 FW installation and therefore no further consultation was required.

Pursuant to Section 106 of the National Historic Preservation Act, the USAF initiated consultation with the State Historic Preservation Officers. For the F-35A missions at the selected installations,
there will be no impacts to archaeological resources or historic properties resulting from implementation of the Proposed Action. Section 106 consultation for the selected installations is complete.

In addition to the coordination and consultation with federal agencies, the USAF also completed government-to-government consultations with potentially affected Tribes. For the F-35A missions, no adverse impacts to tribal resources are anticipated. Consultation with Tribes resulted in concurrence with the USAF finding of no adverse impact.

The selected installations are both within counties that are in attainment for all criteria air pollutants and have no designated maintenance areas. Impacts from proposed construction and operational emissions at both installations will be insignificant for all criteria pollutants (Final EIS, Vol I, page WI-50, § WI3.3.1.2, page WI-50, §WI3.3.1.2, and Record of Air Analysis (ROAA), Appendix C). Applicable air quality pollutants do not exceed *de minimis* thresholds for general conformity (FEIS pages WI-15 & AL-15), therefore a general conformity determination is not required for implementation of the F-35A beddown at either installation.

**MITIGATIONS**

The Environmental consequences identified in the EIS (Vol I, § 2.4, Table 2.4-1 and §§ WI3.0, ID3.0, FL3.0, MI3.0, AL3.0, et seq.) form the scientific and analytic basis for the comparison of the alternatives considered and means to mitigate environmental impacts.

Mitigation measures are implemented to avoid, minimize, rectify, reduce, or compensate for possible impacts. Mitigations were considered for the following significant impacts that are expected as a result of the proposed action.

*Environmental Consequences*

**Ops 5 Madison:**

Noise: There will be an increase of 1,320 acres off-base within the 65 decibel (dB) Day-Night Average Sound Level (DNL) and greater noise contours; an associated increase of 1,019 households and 2,215 people within the 65-70 dB DNL and greater noise contours; 132 of these households (292 persons) will be within the 70-75 DNL noise contours.

Land Use: Approximately 199 acres of residential land use would be included in the 65-75 dB DNL noise contours (potentially incompatible for residential use).

Environmental Justice and Protection of Children: There will be disproportionate impacts to low-income and minority populations, as well as children.
There will be no expected significant impacts from the F-35A beddown to: Airspace, Air Quality, Safety, Socioeconomics, Infrastructure, Earth Resources, Water Resources, Biological Resources, Cultural Resources, or Hazardous Materials, Wastes, or Other Contaminants.

Ops 6 Montgomery:

Noise: There will be an increase of 1,219 acres off-base within the 65 dB DNL and greater noise contours; an associated increase of 46 households and 113 people within the 65-70 dB DNL and greater noise contours; 16 of these households (35 people) will be within the 70-75 dB DNL noise contours.

Land Use: Approximately 37 acres of residential land use included in the 65-75 dB DNL noise contours (potentially incompatible for residential use).

Environmental Justice and Protection of Children: There will be disproportionate impacts to low-income or minority populations, as well as children.

There will be no expected significant impacts from the F-35A beddown to: Airspace, Air Quality, Safety, Socioeconomics, Infrastructure, Earth Resources, Water Resources, Biological Resources, Cultural Resources, or Hazardous Materials, Wastes, or Other Contaminants.

Mitigations

Specific actions, including those required by law or USAF regulation, to facilitate the implementation of the decisions were identified in the Final EIS (Vol I, § 2.6, pages 2-42 thru 2-45) and will be carried forward and implemented. An extensive list of these practices is not provided; only those practices listed in the analysis of the Final EIS are identified. These measures are summarized below by applicable environmental resource areas. It is possible that the impacts identified in the Final EIS (Vol I, § 2.4, Table 2.4-1) may be different from those expected.

The NGB and USAF will prepare mitigation and monitoring plans specific to each installation that identify principal and subordinate organizations having responsibility for oversight and execution of specific mitigation and best management practices (BMPs). The plans will include but not be limited to the following:

- Identification of the specific actions;
- Identification of the responsible organization for each action; and
- Timing for execution of the actions.
Mitigations applicable to both beddown locations are listed below by each of the Final EIS resource areas. The Mitigation and Monitoring Plan will identify who is responsible for implementing specific mitigation, who is responsible for funding them, and who is responsible for tracking these measures to ensure compliance. Specific actions include the following:

**Noise**

- Noise abatement measures at the selected bases may include the modification of flight tracks and increased usage of precision instrument approaches; though Air Traffic Control and individual pilots have ultimate responsibility for the safe operation of aircraft and noise abatement flying procedures will be a secondary consideration to safety of flight.
- To minimize the effects of noise, the Wings will comply, to the extent practicable and considering safety of flight, with noise abatement procedures that the FAA, the Dane County Regional Airport, and the Montgomery Regional Airport currently identified for implementation based on recommendations developed as a result of the current noise exposure maps associated with the Part 150 Studies.
- It is expected that the two airport authorities (Dane County Regional Airport and Montgomery Regional Airport) may submit a request to the FAA to update their respective Part 150 studies (Title 14, CFR Part 150 - Airport Noise Compatibility Planning, the implementing regulations of the Aviation Safety and Noise Abatement Act of 1979, as amended) at the selected installation(s). Part 150 studies could identify specific noise mitigation actions for implementation by FAA, but there is no guarantee that sound mitigation or abatement will take place. Neither the NGB nor the USAF have the authority to expend appropriated funds on facilities that are not under their direct control. However, the FAA provides a voluntary process an airport sponsor\(^\text{1}\) can use to mitigate significant noise impacts from airport users pursuant to the Part 150 program. Eligibility for sound insulation in noise-sensitive land uses through the FAA’s Airport Improvement Program requires that the impacted property is located within a 65 dB DNL or higher noise contour and meet various other FAA criteria used for sound mitigation.

\[^{1}\text{FAA Order 5100.38D, “Airport Improvement Program Handbook,” (Table 2-1), “Public Agency owning (or leasing from another government entity) a public-use airport. A state: a political subdivision of a state (such as a city, municipality, or state agency); a tax-supported organization; or an Indian tribe or pueblo are all considered public agencies….”}]

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Airspace

- To ensure safety of flight, existing procedures and altitude structure will continue to support use of the Air Traffic Service Routes traversing the training airspace and airports located beneath the airspace. The existing procedures include close coordination of scheduling and use of the Special Use Airspace (SUA) by the Wings with the scheduling agencies to ensure safe air traffic operations throughout the SUA.
- The Wings will comply, to the extent practicable and considering safety of flight, with noise abatement procedures and overflight avoidance areas that have been identified in previous coordination with agencies and identified in the local In-flight Guide and/or Flight Information Publications.

Air Quality

- Standard demolition and construction BMPs are generally considered actions that address short-term impacts from specific components of the proposed action, such as construction. BMPs related to air quality will be implemented that will reduce potential impacts to air quality. Examples include, but are not limited to: limiting idling of construction vehicles and equipment, watering during grading activities to control fugitive dust, covering demolition debris during transport, using utility pole power at construction sites instead of portable generators, etc.

Safety

- Personnel conducting construction and/or demolition activities will strictly adhere to all applicable occupational safety requirements during construction activities (i.e., Occupational Safety and Health Administration regulations).

Earth Resources

- Construction BMPs will be employed during construction activities to minimize soil movement, stabilize runoff, and generally control sedimentation. These BMPs will include, but not be limited to: the development of project-specific Stormwater Pollution Prevention Plans (SWPPPs); regular and documented site inspections; the installation of silt fencing and sediment traps; minimizing surficial area disturbed at any given moment; stabilization of cut/fill slopes; minimization of earth-moving activities during wet weather; use of temporary detention ponds; application of water sprays to keep soil from becoming airborne; and revegetation of disturbed areas as soon as possible, as appropriate.
**Water Resources**

- The proposed construction and associated increase in surface water runoff will be attenuated through the use of temporary and/or permanent drainage management features such as use of bioretention, filter strips, vegetated buffers, grassed swales, infiltration trenches, water harvesting, and other applicable BMPs.
- To minimize potential impacts associated with erosion, runoff, and sedimentation, BMPs as described in applicable SWPPPs will be implemented during and following the construction period. All proposed construction is outside the 100-year floodplain. A site-specific SWPPP and associated BMPs will be prepared for any change in the quality or quantity of wastewater discharge and/or stormwater runoff from construction sites where 1 or more acres will be disturbed.
- A Notice of Intent will be filed with the United States Environmental Protection Agency to obtain coverage under the Construction General Permit (General Permit No. PAG-02) prior to implementation of individual projects.

**Cultural Resources**

- In the unlikely event that archaeological or human remains are identified during proposed construction activities, all activities will immediately cease in the area of the discovery and contact the installation Environmental Manager who will contact a qualified archaeologist to evaluate the discovery.

**Hazardous Materials and Wastes, and Other Contaminants**

- Sampling for asbestos-containing material (ACM) and lead-based paint (LBP) will occur prior to demolition activities for those buildings not previously tested and materials will be handled in accordance with USAF policy. If ACM or LBP are present, the Air Force will employ appropriately trained and licensed contractors to perform the ACM and/or LBP removal work and will notify the construction contractors of the presence of ACM and/or LBP so that appropriate precautions could be taken to protect the health and safety of the workers.
- If during construction activities any hazardous material or wastes, and other contaminants are encountered, at the construction site, construction work will be suspended until the Installation’s Environmental Manager has assessed the situation, and if required in consultation with the appropriate environmental regulator, developed a course of action to manage the discovered material/waste in accordance with applicable laws and regulations.
If PFOS/PFOA is encountered at the construction site during construction activities, the PFOS/PFOA will be managed in accordance with DoD and AF guidance.

**AVOIDANCE OR MINIMIZATION OF ENVIRONMENTAL HARM**

The USAF considered and adopted all practicable means to avoid or minimize environmental harm at the analyzed installations.

Once the F-35A aircraft has beddown at these installations, operational reviews will include consideration of additional operational modifications to reduce noise levels. A mitigation and monitoring plan will be developed for each selected installation that will identify mitigations that will eliminate, minimize, rectify, or compensate for the potential impacts of these aircraft beddowns. The plan will also identify parties responsible and a schedule for implementing and monitoring these activities at these two selected beddown locations.

**DECISIONS**

After considering the potential environmental consequences of the Proposed Action and alternatives, as well as other factors related to national defense, including current military operational needs and costs, the USAF has decided to implement the 115 FW and 187 FW alternatives, as described in this ROD. All practicable means to avoid or minimize environmental harm have been adopted. Both selected installations have aging F-16 aircraft in need of replacement and have existing active associations which minimize operational costs. The A-10 aircraft at Boise Airport and Selfridge Air National Guard Base are enduring missions with no pressing need to replace their assigned aircraft. Basing F-35A aircraft at Jacksonville International Airport would have required the F-15 aircraft to move to another location instead of being retired, which would have increased costs. In addition, neither of the A-10 bases nor Jacksonville currently host an active association. Establishing an association at these locations would have driven an additional $4M to $5M annual cost to the Air Force.

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