

**FINDING OF NO SIGNIFICANT IMPACT (FONSI)**  
**FOR**  
**A NEW CHILD DEVELOPMENT CENTER AT**  
**HANSCOM AIR FORCE BASE, MASSACHUSETTS**

Pursuant to provisions of the National Environmental Policy Act (NEPA), Title 42 United States Code (USC) Sections 4321 to 4347, implemented by Council on Environmental Quality (CEQ) Regulations, Title 40, Code of Federal Regulations (CFR) §1500-1508, and 32 CFR §989, Environmental Impact Analysis Process, the Department of the Air Force (DAF) has prepared an Environmental Assessment (EA) to identify and assess the potential environmental consequences associated with a new child development center (CDC) at Hanscom Air Force Base (AFB), Middlesex County, Massachusetts.

**PURPOSE AND NEED FOR ACTION (EA §§ 1.3, Page 1-15)**

The purpose of the Proposed Action is to meet the DoD's design standards, total childcare requirement, and to improve quality of life (QoL) on the base.

The Proposed Action is needed because the existing CDC structure is rated in poor condition, hindering its ability to provide sufficient childcare needs to the community. The CDC does not meet Air Force standards and without increasing capacity, cannot support the mission's continued growth and meet the community's QoL standards.

**PROPOSED ACTION (EA § 2.1, Page 2-1)**

The Proposed Action is to construct a new 36,721 square-foot (sf) CDC building on a site off Eglin Street and adjacent to the existing CDC that was previously used as a temporary school (now demolished) at the Hanscom AFB Main Base. The proposed CDC building includes child-learning space, play space, sleeping space, administrative support area, kitchen area, safe rooms, playgrounds, and supporting infrastructure.

The Proposed Action also includes all utilities, site improvements, new pavement for parking lots/pick-up and drop-off access ways, detection/protection features, security enhancements and other supporting work (e.g., site grading and landscaping) necessary to make a complete and useable facility. The building has been designed as permanent construction in accordance with DoD Unified Facilities General Building Requirements and Unified Facility Criteria (UFC).

**SELECTION STANDARDS (EA § 2.2, Page 2-1)**

Constructing a new CDC that meets DoD design standards, total childcare requirement, and improves QoL on the base was determined to be the only reasonable alternative(s) that meets the selection standards presented in Table 2-1 on page 2-3 and described in EA § 2.2.

## **DETAILED DESCRIPTION OF ALTERNATIVE(S) (EA § 2.3, Pages 2-3 to 2-6)**

The analysis of the Proposed Action to construct a new CDC that meets DoD design standards and total childcare requirement and improves QoL on the base includes five Alternatives. Based on the selection standards, the EA considers all potential impacts of Alternative 1 (the Preferred Alternative), Alternative 2, and the No-Action Alternative. The EA also considers cumulative environmental impacts with other proposed projects in the Region of Influence (ROI).

### **ALTERNATIVE 1 (Preferred Alternative) – Construct a new CDC at the former temporary school location adjacent to the existing CDC (EA § 2.3.1, Page 2-3)**

The Preferred Alternative involves constructing a new CDC at the former temporary school location on the Main Base, southeast of the Vandenberg Drive and Eglin Street intersection, adjacent to the existing CDC and in the vicinity of the Hanscom Primary/Middle School.

### **ALTERNATIVE 2– Construct a new CDC at the ballfields off Airport Road (EA § 2.3.2, Pages 2-3 to 2-6)**

Alternative 2 involves constructing a new CDC on an area of the base that is currently used for athletics/ballfields. This site is off Airport Road, south of the Hanscom Fitness and Sports Center, and adjacent to the Hanscom Primary/Middle School.

### **NO-ACTION ALTERNATIVE (EA § 2.3.3, Page 2-6)**

The CEQ regulation 40 CFR §1502.14(d) requires the inclusion of a No Action Alternative in the NEPA analysis. The No Action Alternative serves as the baseline against which alternatives can be evaluated to identify impacts to the natural and built environments. Under the No Action Alternative, Hanscom AFB would not construct a new CDC. The No Action Alternative would not meet the DoD requirement to provide childcare services at 100 percent of the total base requirement, leaving a capacity deficit of approximately 40 children. This deficiency is detrimental to the QoL of Hanscom personnel.

### **ALTERNATIVES ELIMINATED FROM FURTHER CONSIDERATION (EA § 2.4, Page 2-6)**

Two alternatives were initially considered during the environmental impact analysis process and eliminated from further consideration because they did not meet all the criteria for the selection standards presented in Table 2-1 on page 2-3. The alternatives were:

- Alternative 3 – Construct a new CDC building in the grassy area west of the current CDC building (Building #1994) on Eglin Street. This area of the base has been historically used as a refuse/landfill site. The landfill has been discontinued and closed; however, the presence of landfill materials in the subsurface of this site decreases the suitability for construction, and therefore does not meet the purpose and need of the Proposed Action.
- Alternative 4 – Renovate the existing CDC building. Renovations to the existing CDC building would result in construction related disruptions that would prevent the usage of this building for the duration of construction. Construction related disruptions to the existing building would result in impacts on goals for continual mission growth and community QoL standards. Therefore, this alternative does not meet the purpose and need of the Proposed Action.

### **SCOPE OF ANALYSIS (EA § 3.0, Page 3-1)**

Regardless of the alternative selected, the following resources would not be affected by the Proposed Action and are not discussed in detail in the EA: Air installation Compatible Use Zone (AICUZ), Noise, and Occupational Health and Safety.

### **AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES (EA § 3.0, Pages 3-2 to 3-30)**

The Environmental Assessment, incorporated by reference into this finding, analyzes the potential environmental consequences of activities associated with implementing the Preferred Alternative (Alternative 1) and Alternative 2. The EA considers all potential impacts of the Preferred Alternative, Alternative 2, and the No-Action Alternative. The EA also considers cumulative environmental impacts with other projects in the Region of Influence. The analyses of the affected environment and environmental consequences of implementing the Preferred Alternative and Alternative 2 presented in the EA concluded that by implementing environmental protection measures, the DAF would be in compliance with all terms and conditions and reporting requirements stipulated by the United States Fish and Wildlife Service (USFWS), and with the conditions stipulated in the Programmatic Agreement (PA) between Hanscom AFB and the Massachusetts State Historic Preservation Office (SHPO) regarding the management of historic properties at Hanscom AFB.

The DAF has concluded that implementation of the Preferred Alternative and Alternative 2 would have no adverse impacts on the following resources:

#### **AIR QUALITY (EA § 3.2.1, Pages 3-2 to 3-8)**

The potential impacts to air quality as a result of implementing the Preferred Alternative and Alternative 2 are associated with emissions related to construction and demolition (C&D) activities. The Air Force Conformity Applicability Model (ACAM) was performed in accordance with the Air Force Manual 32-7002, Clean Air Act (CAA Section 176(c)), Air Quality Compliance And Resource Management; the Environmental Impact Analysis Process (EIAP, 32 CFR 989); and the General Conformity Rule (GCR, 40 CFR 93 Subpart B) to assess potential air quality impact(s) associated with the Preferred Alternative and Alternative 2.

The results of the analysis show that emissions of all potential construction activities for the Preferred Alternative and construction and demolition activities associated with Alternative 2 would both have *de minimis* impacts on the air quality, with all NAAQS emissions well below threshold limits. Overall, the analysis showed that the air conformity rules were not applicable. Although some increase in air pollutant emissions is expected during construction activities, they would not be significant and would be temporary. Best management practices would be applied during construction activities, to the maximum extent possible. All equipment and vehicles used during construction would be maintained in good operating condition so that exhaust emissions are minimized. Dust will be controlled on-site using appropriate dust abatement techniques. As a result, no significant short-term or long-term impacts to air quality are anticipated.

#### **LAND USE (EA 3.2.2, Page 3-8)**

The demolition of the two concession stands at the Alternative 2 site and the construction of the new CDC and parking at both the Preferred Alternative and Alternative 2 sites would be compatible with current land use and future Hanscom AFB land use plans. No significant short-term or long-term land use impacts would be experienced because of the Preferred Alternative and Alternative 2. However, the Preferred Alternative best aligns with the designated land use zone (community service) and would be most suitable due to its proximity to the existing CDC.

### **WATER RESOURCES (EA § 3.2.3, Pages 3-10 to 3-15)**

No groundwater features, surface water features, wetlands, or floodplains are present within the footprints of the Preferred Alternative and Alternative 2. Therefore, construction activities are not anticipated to directly affect these resources. During construction, all activities would be conducted in accordance with best management practices (BMPs) to prevent adverse impacts to the stormwater system discharges and inadvertently to the receiving water (Shawsheen River). Stormwater design features such as stormwater retention/detention basins and treatment practices would be installed to ensure that post development runoff does not exceed pre-development runoff. Given that the Preferred Alternative and Alternative 2 are anticipated to impact over one acre of land; a NPDES permit will be required by the EPA under a General Construction Permit for stormwater management. As part of the NPDES permit, a comprehensive Stormwater, Erosion, and Sedimentation Control Plan and a Stormwater Pollution Prevention Plan (SWPPP) would be prepared.

### **SOIL AND GEOLOGICAL RESOURCES (EA § 3.2.4, Pages 3-15 and 3-16)**

The Preferred Alternative and Alternative 2 are anticipated to result in limited grading and topography changes from the construction of the CDC building and the new parking lots. Both sites have previously been disturbed and are mostly flat. Minimal and temporary impacts to soil are anticipated by land clearing and construction activities associated with the Proposed Action. Sediment control measures would be adjusted to meet field conditions during all phases of construction. These measures would be constructed prior to and immediately after grading or disturbance of surface material. No short-term or long-term adverse impacts on the geology of the areas are anticipated with the implementation of the Preferred Alternative and Alternative 2.

### **CULTURAL RESOURCES (EA § 3.2.5, Pages 3-16 to 3-18)**

No historic district or archaeologically sensitive areas are located on the Preferred Alternative and Alternative 2 sites; therefore, no impacts on cultural resources are anticipated. On July 5, 2023, DAF sent a consultation letter to SHPO stating that, in accordance with Section 106 of the NHPA (5 United States Code 306018) and its implementing regulation at 36 CFR Part 800, DAF has determined that there are no historic properties present; therefore, no adverse effects to historic properties are anticipated. In a letter received on August 9, 2023, the SHPO concurred with the DAF's determination.

Federal agencies are required to consult with tribes when an agency action might affect historic properties of religious and cultural significance to the tribes. No cultural resources are located within the Preferred Alternative; nevertheless, to help fulfill the obligation above, DAF also sent consultation letters to the Wampanoag Tribe of Gay Head (Aquinnah) and the Mashpee Wampanoag Tribe for their assistance in identifying any such properties on Hanscom AFB, particularly within the Preferred Alternative area that may be of significance to the tribes. This includes archeological sites, burial grounds, sacred landscapes or features, ceremonial areas, traditional cultural properties and landscapes, plant and animal communities, and buildings and structures with significant tribal association. The provisions for inadvertent discovery or archeological resources would be incorporated into the Proposed Action, consistent with all ground disturbing projects at Hanscom AFB.

### **BIOLOGICAL/NATURAL RESOURCES (EA § 3.2.6, Pages 3-18 to 3-20)**

Under the Preferred Alternative and Alternative 2, impacts on the natural vegetation from construction activities are anticipated. Approximately one acre of trees and vegetation would be removed as a result of the Preferred Alternative. Alternative 2 would result in minimal vegetation (tree) removal, as the area is previously disturbed and improved with softball fields, tennis courts, and concession stands.

Under both alternatives, noise associated with C&D activities would have a minor, short-term impact on local wildlife in the area.

Every undertaking is required to undergo a separate consultation with USFWS to ensure that any effects on protected species are considered. In place of these consultations, a “No Effect” determination is in effect for undertakings conducted at Hanscom AFB between October 2, 2018 and October 1, 2023, unless subsequently rescinded based on newly acquired science or information.

Therefore, no short-term or long-term adverse impacts on biological/natural resources are anticipated as a result of the Preferred Alternative and Alternative 2.

### **INFRASTRUCTURE (EA § 3.2.7, Pages 3-20 to 3-26)**

The Preferred Alternative and Alternative 2 would both support the goals of the DoD, DAF, and Hanscom AFB by focusing and sustaining quality mission execution, building a sustainable installation, and improving installation facilities and services. Both alternatives will contribute to the enhancement of childcare services on the base, reducing the deficit and reliance on off base childcare services.

Under both alternatives, the new CDC building would primarily serve the on-base community and reduce off-base trips, resulting in negligible impacts on off-base trips. Therefore, no adverse long-term impacts on traffic are anticipated as traffic generated is expected to be similar to current levels. Temporary impacts on traffic are anticipated to result from construction activities. However, all practicable mitigation measures in accordance with Hanscom AFB regulations will be adopted to minimize and prevent any resulting impacts on traffic, air quality, and noise.

In addition, an increase in utility (water, energy, wastewater, stormwater) usage is expected solely due to the addition of new employees and children. The estimated increase in utility consumption is expected to be well within the base’s total capacity. Therefore, no long-term impacts to infrastructure are anticipated as a result of both the Preferred Alternative and Alternative 2.

Any short-term, construction related impacts would be mitigated by the planning and project approval requirements of Hanscom AFB, which are in place to ensure appropriate levels of base resources. To avoid temporary disturbances, the Proposed Action will be coordinated with surrounding buildings to ensure critical infrastructure remains in service. Therefore, no significant short-term infrastructure impacts would be experienced because of implementing the Preferred Alternative and Alternative 2.

### **SOLID WASTE AND HAZARDOUS WASTES (EA § 3.2.8, Pages 3-26 to 3-29)**

Short-term, minor, adverse effects would result from increased C&D debris generated from both the Preferred Alternative and Alternative 2. Disposal of solid waste would be covered under the agreement with the building contractor. Following established Hanscom AFB and Massachusetts Department of Environmental Protection (MassDEP) protocols and BMPs, construction debris would be recycled to the greatest extent feasible. Inert debris (concrete, asphalt, dirt, brick, and other rubble) would be incorporated into reuse and recycling programs when possible.

During operation of the CDC, solid waste production would slightly increase with the addition of employees and children on base. However, the percentage increase to be generated is estimated to be

within the base's solid waste capacity. Therefore, no adverse on solid waste impacts would occur with the implementation of the Preferred Alternative and Alternative 2. All waste would be managed, recycled, and disposed of in accordance with Hanscom AFB and MassDEP regulations.

No hazardous waste is proposed to be generated or stored in the CDC building.

### **SOCIOECONOMICS AND ENVIRONMENTAL JUSTICE (EA § 3.2.9, Pages 3-29 and 3- 30)**

No adverse impacts on socioeconomics and environmental justice are anticipated from the Preferred Alternative and Alternative 2. Both alternatives are infrastructure and capacity-related undertakings within Hanscom AFB. The Proposed Action is not expected to result in direct adverse impacts on ROI communities or Environmental Justice communities. While it is likely there will be an inconvenience factor related to the construction of the CDC building as traffic may be impeded and noise and air quality impacts occur, these impacts are anticipated to be temporary, localized, and have no lasting economic impacts on households and populations within the surrounding communities or EJ communities.

Moreover, the Preferred Alternative and Alternative 2 are not anticipated to have any impacts on the current, or future composition, of the environmental justice population with respect to altering race/ethnicity, income, or English proficiency metrics.

Instead, short-term and long-term beneficial effects on socioeconomics and local economy are anticipated. An increase in local employment would be expected due to new jobs associated with construction and operation of the CDC building. The use of local construction workers would assume an increase in local sales volume, payroll taxes, and purchases of goods and services that would result in short-term beneficial increases in the local economy. In addition, the Preferred Alternative and Alternative 2 would provide affordable childcare services to meet the growing on base demand, reducing need for off base childcare services.

### **PUBLIC REVIEW / INTERAGENCY COORDINATION (EA §§ 1.9, Page 1-18)**

A notice of availability was published in the Lexington Minuteman and Concord Journal on **DATE**, inviting the public to review the Draft EA and draft Finding of No Significant Impact (FONSI) for a 30-day comment period. In addition, DAF issued a press release on **DATE** announcing the availability of the Draft EA and FONSI. Copies were posted to the HAFB public facing website (<https://www.hanscom.af.mil/About-Us/Fact-Sheets/Display/Article/379486/civil-engineering>) for download and review. The public comment period closed on **DATE** and **XX** comments were received.

### **FINDING OF NO SIGNIFICANT IMPACT (FONSI)**

Based on my review of the facts and analyses contained in the *New Child Development Center EA* conducted under the provisions of NEPA, CEQ Regulations, and 32 CFR §989, I conclude that the Preferred Alternative would not have a significant environmental impact, either by itself or cumulatively with other known projects. Accordingly, an Environmental Impact Statement is not required. The signing of this Finding of No Significant Impact completes the environmental impact analysis process.

Base Civil Engineer