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STAFF SUMMARY SHEET

	TO	ACTION	SIGNATURE (Surname), GRADE AND DATE		TO	ACTION	SIGNATURE (Surname), GRADE AND DATE
1	MSG/CC	Coord	<i>[Signature]</i> Lt Col 19 Mar 05	6	AFSOC/CEV	Coord	<i>[Signature]</i> 11 Apr 05
2	RQW/CCEA	Log in		7	AFSOC/JA	Coord	<i>[Signature]</i> 26 Apr 05
3	RQW/CCE	Review	<i>[Signature]</i> 21 Mar	8	AFSOC/CE	Sign	
4	RQW/CC	Coord	<i>[Signature]</i>	9			
5	RQW/CCEA	Log out		10			

SURNAME OF ACTION OFFICER AND GRADE	SYMBOL	PHONE	TYPST'S INITIALS	SUSPENSE DATE
Mitchell, GS-13	CES/CEV	DSN 460-3069	gwl	

SUBJECT Finding of No Significant Impact (FONSI) and Finding of No Practicable Alternative (FONPA) for the Installation Boundary Fence Replacement: Wetland Areas, Moody AFB	DATE 2 Feb 05
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SUMMARY

- PURPOSE:** Acquire AFSOC/CEV signature on attached FONSI/FONPA (Tab 1) and Environmental Assessment (EA) document which finalizes the environmental impact analysis for the Installation Boundary Fence Replacement: Wetland Areas project. This project will facilitate compliance with security and safety regulations pertaining to installation boundary fences.
- BACKGROUND:** Pursuant to the Council on Environmental Quality regulations, 40 CFR Parts 1500-1508 (NEPA), and AFI 32-7061 (EIAP) as promulgated in 32 CFR 989, an assessment was conducted of the potential environmental consequences resulting from the proposed replacement of the boundary fence in wetland areas at Moody AFB. The subject EA resulted in a FONSI/FONPA relative to the desired action.
- DISCUSSION:** The EA considers all the potential impacts of the proposed action and alternatives, including the No Action Alternative. The FONSI concludes that there are no significant direct, indirect, or cumulative impacts associated with the proposed action. The FONPA concludes that approximately 0.119 disjunct acres of wetlands would be impacted by the proposed action, but that there is no other practicable alternative.
- In accordance with 32 CFR 989 and HQ USAF/IL memorandum, 8 Mar 01 (Tab 3), AFSOC/CEV is authorized to approve the final FONSI and FONPA.
- RECOMMENDATION:** AFSOC/CEV sign the attached FONSI/FONPA at Tab 1 where indicated.



DAVID L. CARLON, Lt Col, USAF
Commander

Tabs

1. FONSI/FONPA
2. Environmental Assessment (EA)
3. HQ USAF/IL Memorandum, 8 Mar 01

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**Installation Boundary Fence Replacement:
Wetland Areas**

**Environmental Assessment and
FONSI/FONPA**

**Moody AFB, Georgia
February 2005**

INSTALLATION BOUNDARY FENCE REPLACEMENT: WETLAND AREAS
MOODY AIR FORCE BASE, GEORGIA
FINDING OF NO SIGNIFICANT IMPACT and
FINDING OF NO PRACTICABLE ALTERNATIVE

1.0 DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

1.1 Proposed Action

Moody Air Force Base (AFB), Georgia proposes to replace the boundary fence in wetland areas in order to mark the legal and physical demarcation of the installation boundary. The barbed-wire fence that is currently in place is in serious disrepair and does not provide an adequate security barrier for Moody AFB. Fallen trees and severe overgrowth have knocked down portions of the fence leaving the base susceptible to unauthorized entry. The proposed action consists of removing the current fencing through the wetland boundaries of Moody AFB where fencing is not adequate and installing a seven-foot chain-linked fence with two-foot barbed wire out-rigging. Approximately 10 miles of fence would be replaced under this proposal. In some areas, vegetation would have to be cleared to a width of approximately 15 feet to accommodate construction vehicle passage.

1.2 Alternatives

The two alternatives to the proposed action are: 1) diverting the construction of the fence to upland areas owned or controlled by Moody AFB; and, 2) the no action alternative.

While Alternative 1, the diversion of the boundary fence around wetland areas, was evaluated in the document, this alternative was deemed infeasible because of current safety and security regulations. Department of Defense and Air Force regulations require that boundary fences be placed on the legal jurisdictional boundary of installations to prevent encroachment and to mark the physical location of federal property on the landscape.

Therefore, there were no practicable alternatives that would not result in impacts to wetlands and waters of the U.S.

2.0 SUMMARY OF ENVIRONMENTAL IMPACTS

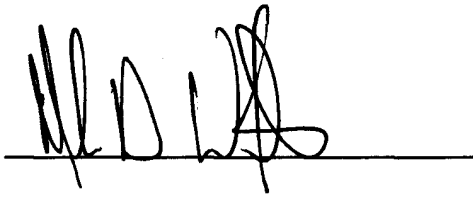
Temporary increases in air emissions would occur, and a limited corridor of native vegetation would be removed. Although there would be some minor disturbances to wildlife species movements as a result of installing the fence, these were considered insignificant. Soil impacts, including erosion and sedimentation, would be minimized through the use of silt fences and other protective Best Management Practices. No impacts are expected to cultural resources. Long-term impacts to wetlands and waters of

the U.S. would be limited fill from the installation of fence posts. An estimated 6,600 fence posts would be installed, with an estimated fill of 0.119 disjunct acres of wetlands.

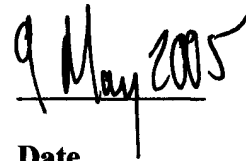
Overall, there would not be any significant impacts to the environment as a result of implementation of the proposed action or any of the evaluated alternatives. Also, there were no significant cumulative effects noted that would occur as a result of implementation of the proposed action or any of the evaluated alternatives.

3.0 CONCLUSION:

The attached EA was prepared and evaluated pursuant to the National Environmental Policy Act (Public Law 91-190, 42 U.S.C. 4321 *et seq.*) and according to 32 Code of Federal Regulations 989, *The Environmental Impact Analysis Process*. Based on the findings of the environmental assessment, no significant impact is anticipated from implementation of the proposed action. I have concluded that the proposed project titled, "Installation Boundary Fence Replacement: Wetland Areas" does not constitute a "major Federal action significantly affecting the quality of the human environment" when considered individually or cumulatively in the context of the referenced act, including both direct and indirect impacts. Therefore, issuance of a Finding of No Significant Impact is warranted, and an environmental impact statement is not required. Pursuant to Executive Order (EO) 11988 and EO 11990, the authority delegated in Secretary of the Air Force Order 791.1, and taking the above information into account, I find there is no practicable alternative to this action.



MARK D. WRIGHT, Colonel, USAF
The Civil Engineer



Date

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INSTALLATION BOUNDARY FENCE REPLACEMENT: WETLAND AREAS
ENVIRONMENTAL ASSESSMENT

1.0 PURPOSE OF AND NEED FOR THE PROPOSED ACTION

1.1 Background, Purpose, and Need for the Proposed Action

Moody Air Force Base (AFB), Georgia proposes to replace the boundary fence in wetland areas in order to mark the legal and physical demarcation of the installation boundary. The barbed-wire fence that is currently in place is in serious disrepair and does not provide an adequate security barrier for Moody AFB. Fallen trees and severe overgrowth have knocked down portions of the fence leaving the base susceptible to unauthorized entry. The proposed action consists of removing the current fencing through the wetland boundaries of Moody AFB where fencing is not adequate and installing a seven-foot chain-linked fence with two-foot barbed wire out-rigging. Approximately 10 miles of disjunct fencing would be replaced under this proposal. In some areas, vegetation would have to be cleared to a width of approximately 15 feet to accommodate construction vehicle passage.

1.2 Location of the Proposed Action

Moody Air Force Base is located in south-central Georgia approximately 10 miles northeast of Valdosta. The proposed action will occur along the boundary of Moody AFB from Mission Lake around Grand Bay Range to Eisemann Road. The fence would only be constructed in wetland areas where adequate fencing is not already present. Refer to Figures 1 and 2 for the general location of Moody AFB and the location of the proposed project.

1.3 Scope of the Environmental Review

Issues that could potentially be impacted by the proposed action include:

- Air Resources
- Wildlife Resources
- Vegetation Resources
- Cultural Resources
- Soil Resources
- Water Resources/Wetlands

1.4 Applicable Regulations Required

The command at Moody AFB has the responsibility to ensure that all projects comply with the National Environmental Policy Act (NEPA), as well as the Clean Air Act, the Clean Water Act, the Endangered Species Act, Executive Order 11990, Executive Order 13112, the National

Historic Preservation Act, the Resource Conservation and Recovery Act (RCRA), and other applicable environmental laws and regulations.

2.0 DESCRIPTION OF PROPOSED ACTION AND ALTERNATIVES

2.1 Minimum Selection Criteria

The Air Force considered several alternatives to the Proposed Action. In the initial screening of these alternatives, the Air Force took into consideration minimum selection criteria. Only those alternatives that met these criteria were considered suitable for detailed analysis. The selection criteria were in conformance to existing laws, Air Force Special Operations Command (AFSOC) and Department of the Air Force (AF) policy and regulations, and the Integrated Natural Resources Management Plan.

2.2 Detailed Description of Proposed Action

The proposed action consists of removing the current fencing through the wetland boundaries of Moody AFB where fencing is not adequate and installing a seven-foot chain-linked fence with two-foot barbed wire out-rigging. Approximately 10 miles of disjunct fencing would be replaced under this proposal. In some areas, vegetation would have to be cleared to a width of approximately 15 feet to accommodate construction vehicle passage. The environmental effects of this alternative will be further analyzed in this document.

2.3 Alternatives

2.3.1 Alternative A

Under this alternative, wetland areas would be avoided by diverting the construction of the fence to upland areas owned or controlled by Moody AFB. The environmental effects of this alternative will be further analyzed in this document.

2.3.2 Alternative B – No Action Alternative

Under this alternative, the fence would not be replaced. The inadequate barbed-wire fencing that currently exists would not be replaced and Moody AFB would continue to be in violation of the Air Force Installation Security Program. Security Forces personnel would continue to be forced to implement a more robust and thorough surveillance program to compensate for the lack of physical security. The environmental effects of this alternative will be further analyzed in this document.

3.0 AFFECTED ENVIRONMENT

3.1 Introduction

The physical and biological components of Moody Air Force Base (AFB) are described in Moody AFB's INRMP and in the Moody AFB Natural Heritage Inventory Final Report. These documents are available for review in the Environmental Flight of the Civil Engineer Squadron. Only information specific to the project will be discussed here.

None of the analyzed alternatives would have significant negative impacts to areas of critical environmental concern, prime or unique farmlands, coastal zones, wilderness areas, wild or scenic rivers, or to Native American religious concerns.

3.2 Air Resources

The Clean Air Act dictates that National Ambient Air Quality Standards (NAAQS), established by the Environmental Protection Agency, must be maintained nationwide. The NAAQS have included standards for six "criteria" pollutants: ozone, nitrogen oxide, carbon monoxide, particulate matter (10 microns or less), sulfur dioxide, and lead. Lowndes County is an attainment area for all NAAQS "criteria" pollutants. Specifically, in regards to the Clean Air Act and regulation of installation emissions, Moody AFB is not classified as a major source of criteria pollutants. In addition, Moody AFB operates under a Synthetic Minor Permit for Hazardous Air Pollutants (HAPs); that permit was issued on 22 July 2004.

3.3 Wildlife Resources

Because of the current state of disrepair of the fence around the installation, the migration and emigration of wildlife species is not restricted. Common wildlife species that may occur transiently on the site would include white-tailed deer, raccoons, opossums, American alligators and river otters. Surveys for rare, threatened, and endangered (RTE) species were conducted in 1993-94 by The Nature Conservancy and in 1995 by Geo-Marine. Surveys for RTE bats that might use these areas for foraging were conducted in 2001, and surveys for flatwoods salamanders have been continuing since 2002. Additional surveys of the proposed project area were conducted by installation personnel as part of this action. No RTE species were recorded as occurring within the proposed project site. However, the state-listed round-tailed muskrat is known to exist in marshy habitat within Moody Bay on Moody AFB and within Grand Bay on state-owned land south of the installation. Muskrats may occasionally cross the installation boundary to move from one area to another; however, radiotelemetry studies conducted on this species at Moody AFB indicates that such movements are extremely rare.

3.4 Vegetation Resources

The current installation boundary fence has not been maintained in several years. Consequently, trees, shrubs, and other vegetation have been allowed to grow in and around the fence. The proposed project area is comprised of typical wetland vegetation such as pond cypress, black gum, water oak, slash pine, pond pine, and red maples. In some areas, the vegetation is very

dense. Surveys for RTE plant species was conducted by The Nature Conservancy in 1993-94. No RTE plant species were identified within the proposed project area or the area associated with Alternative A.

3.5 Cultural Resources

The cultural history of Moody AFB extends from approximately 8000 years ago up through the present, and includes Native American settlement sites, 19th century agricultural homesteads, and World War II structures. A Phase I Archeological Survey of upland sites was accomplished as part of a base-wide survey in 1995. However, the wetland areas of Moody AFB have not been surveyed for archaeological remains and so the archaeological significance of the proposed project areas is unknown. No archeological resources were identified in the area potentially affected by Alternative A.

3.6 Soil Resources

The soils underlying the proposed project area are classified as Johnston loam (Jo), Pelham loamy sand (Pe), Alapaha loamy sand (At), Mascotte sand (Mn), Olustee sand (Oa), Bayboro loam (Bm), Leefield loamy sand (Le) and Rutledge loamy sand (Ro). These soils range from very poorly drained to somewhat poorly drained with slopes ranging from 0 to 2 percent (with the exception of At, which has slopes ranging from 0 to 3 percent. These soils are not classified as a prime or unique farmland according to the Natural Resources Conservation Service (NRCS) or the U.S. Department of Agriculture.

3.8 Water Resources/Wetlands

The proposed project area drains into the Grand Bay system, which eventually leads to the Suwannee River and the Gulf of Mexico. Wetland boundaries were delineated in the fall of 1997. The proposed project would be conducted along the boundary of Moody AFB solely in wetland areas. These wetlands include nine small tributaries that drain into permanent creeks and other wetland sites.

4.0 ENVIRONMENTAL CONSEQUENCES

4.1 Air Resources

4.1.1 Proposed Action

The construction of the chain-linked fence would lead to temporary increases in air emissions as a result of the equipment used to install the posts. However, these air emissions would be of short-term duration and would be present only during the initial construction of the fence. The fence itself would not be an emission source. Therefore, these emissions are not considered a significant impact on overall air resources on the installation.

4.1.2 Alternative A

The impacts to air resources under this alternative would be similar to the proposed action. Therefore, there would be no significant impacts to air resources as a result of this alternative.

4.1.3 Alternative B- No Action Alternative

There would be no impacts to air resources as a result of this alternative.

4.2 Wildlife Resources

4.2.1 Proposed Action

Currently, the installation boundary fence consists of a three-strand barbed wire fence in various stages of disrepair. This fence does not hamper wildlife movements across the boundary of the installation. However, the proposed action to replace this barbed wire fence with a six-foot chain link fence with barbed wire outriggers would hamper the ability of some wildlife species to cross the installation boundary. However, movement across the boundary by most animals would not be precluded even though it is likely to be minimized. Typically, installation boundary fences are not considered complete barriers to wildlife movement; however, the normal foraging patterns for some larger wildlife species, such as white-tailed deer, would likely be affected as they would be less likely to cross taller fences unless fleeing danger. Smaller wildlife species, such as amphibians, reptiles and rodents, would continue to be able to cross the installation boundary without impedance.

Surveys conducted to determine the presence and location of RTE species did not report any species from within the proposed project area. While there is the potential for round-tailed muskrat dispersion to be affected by the fence, scientific studies conducted at Moody AFB indicated that movement across the current boundary fence by muskrats did not typically occur. No other RTE species present on Moody AFB would be impacted by the fence. Therefore, following a period of adjustment to the presence of the fence, there should be no significant impacts to wildlife species as a result of implementation of the proposed action.

4.2.2 Alternative A

The impacts to wildlife resources as a result of this alternative would be similar to the proposed action. Therefore, there would be no significant impacts to wildlife resources as a result of this alternative.

4.2.3 Alternative B – No Action Alternative

There would be no impacts to wildlife resources as a result of this alternative.

4.3 Vegetation Resources

4.3.1 Proposed Action

The proposed action would require extensive clearing of dense vegetation in some places producing minor disturbances in the vegetation of the project area during construction. A 15-foot wide corridor of vegetation would have to be cleared to facilitate the construction of the fence. Merchantable trees would be sold and removed under a small lot timber sale. The remaining vegetation would be removed as part of the construction process. All of the vegetation present on the fences lines are native species that are traditionally found in areas of disturbance and are well represented throughout the region, and there are no RTE species present that could be affected. Therefore, the loss of vegetation within the fence corridor would not result in any significant impacts to vegetation resources as a whole.

4.3.2 Alternative A

Under this alternative, wetland vegetation would not be impacted. However, a similar 15-foot wide corridor of upland vegetation, including pines, oaks and other native species, would have to be removed. Merchantable trees would be sold and removed under a small lot timber sale. The remaining trees and vegetation would be removed as part of the construction process. All of the vegetation present along the fence lines are native species and are commonly found throughout south Georgia, and there are no RTE species present that could be affected. The loss of a 15-foot wide corridor would not constitute a major loss of vegetation when considered at the landscape level. Therefore, there would be no significant impacts to vegetation resources as a result of this alternative.

4.3.3 Alternative B – No Action Alternative

There would be no impacts to vegetation resources as a result of this alternative.

4.4 Cultural Resources

4.4.1 Proposed Action

The proposed action will take place in an area of the base that has been virtually impossible to survey for cultural resources by the traditional means. The project area is located in wetlands,

which are typically not suitable for shovel testing. However, archeological sites do occur in wetland environments and frequently have a high level of preservation, so it is possible that installation of the fence, harvesting of the merchantable timber, or clearing of the vegetation may affect significant cultural resources. Installation of the fence would include careful attention to the ground disturbances, and measures would be in place to halt installation in the event that cultural resources are uncovered. Installation of the fence would not resume until the resources had been assessed for significance. If these stipulations are followed, there should not be any significant impacts to cultural resources. In accordance with the National Historic Preservation Act, the State Historic Preservation Office (SHPO) will be consulted prior to implementation of any action that might disturb cultural resources.

4.4.2 Alternative A

This alternative would be similar to the proposed action except that all of the ground disturbance would be limited to upland areas adjacent to the wetlands. These areas were surveyed as part of the installation Phase I survey, and no cultural resources were identified as being present. However, the same procedures as listed in 4.4.1 above would be followed to ensure that unknown cultural resources are not negatively impacted by the implementation of this alternative. Therefore, there would be no significant impacts to cultural resources as a result of this alternative.

4.4.3 Alternative B – No Action Alternative

There would be no impacts to cultural resources as a result of this alternative.

4.5 Soil Resources

4.5.1 Proposed Action

All of the soils underlying the proposed project area are classified as hydric soils, which means that they are generally unsuitable for construction purposes because of wetness and flooding potential. The use of equipment on these soils could result in soil compaction; however, the effect of compaction would be slight since these sites are already inundated most of the year and are not used for agricultural purposes.

The provisions of the Georgia Erosion and Sedimentation Control Act would be followed, and silt fences and other protective best management practices (BMPs) would be employed to minimize soil erosion and sedimentation on the site. More detailed information on BMPs is discussed in Section 4.6 below. Measures would be implemented to control the spillage of fuels, lubricants or other contaminants that might otherwise enter the wetland. Therefore, there would be no significant impacts to soil resources as a result of the proposed action.

4.5.2 Alternative A

Under this alternative, there would be a greater risk of erosion and sedimentation, as soil disturbance in areas adjacent to wetlands could impact those wetlands. Therefore, the Georgia

Erosion and Sedimentation Control Act would be followed and silt fences and other protective BMPs would be put in place to eliminate or minimize the amount of soil entering the wetland area. None of the soils in the adjacent areas are considered to be prime and unique farmlands, so there would be no impact on existing agricultural land. Overall, there would be no significant impacts to soil resources as a result of this alternative.

4.5.3 Alternative B – No Action Alternative

There would be no impacts to soil resources as a result of this alternative.

4.6 Water Resources/Wetlands

4.6.1 Proposed Action

Under the proposed action, a 15-foot wide corridor of wetlands along the boundary of Moody AFB would be disturbed. While disjunct, the entire area proposed for fence replacement would comprise approximately 18 acres of wetlands. Fence construction would involve the filling of wetlands with fence posts and the concrete used to secure the posts. Assuming that fence posts are placed eight feet apart, a total of 6,600 fence posts would be erected within the 52,272 ft corridor. Based on the assumption that a one-foot diameter hole would be filled to erect each fence post, a total of 0.119 acres of wetlands would be filled under the proposed action.

Construction equipment used to put in the fence would result in some compaction of the soil and would increase turbidity and sedimentation in areas of standing water. However, given the limited size of the project area and the use of mats to support equipment and minimize soil impacts, there should not be any significant impacts as a result of implementation of this action.

Best management practices (BMPs) would be used in order to minimize the impact on the wetlands. In accordance with the provisions of State of Georgia General Permit No. GAR100001, Authorization to Discharge Under the National Pollutant Discharge Elimination System: Storm Water Discharges Associated with Construction Activity for Stand Alone Construction Projects, and the Georgia Erosion and Sedimentation Control Act, an erosion, sedimentation, and pollution control plan will be developed and approved by the Georgia EPD and the Georgia Soil and Water Conservation Commission prior to implementation. This plan will outline the specific BMPs that will be used during the fence replacement project. Examples of BMPs likely to be used would include the installation of temporary control devices throughout construction (such as silt fences, slope drains, straw bales, inlet protection, sediment traps, and protective fencing) and implementation of measures to control the spillage of fuels, lubricants or other contaminants that might otherwise enter the wetland. At a minimum, silt fencing, straw bales, and inlet protection devices will be employed to prevent sediments resulting from the proposed action from being distributed off-site.

Because the proposed project would be conducted in wetland and floodplain areas, a Finding Of No Practicable Alternative (FONPA) as required by executive orders 11988, *Floodplain Management*, and 11990, *Protection of Wetlands*, would be required in addition to permits from the Corps of Engineers under Section 404 of the Clean Water Act.

4.6.2 Alternative A

Under this alternative, no wetlands or floodplains would be impacted by the replacement of the fence. However, DoD and Air Force regulations require that boundary fences be placed on the legal, jurisdictional boundary of the installation to prevent encroachment and to mark the physical location of federal property on the landscape. Therefore, this alternative is not considered a practicable alternative.

4.6.3 Alternative B – No Action Alternative

There would be no impacts to water resources/wetlands as a result of this alternative.

4.7 Cumulative Effects

4.7.1 Definition of Cumulative Effects

The Council on Environmental Quality (CEQ) implementing guidelines for NEPA require that both the direct and the cumulative effects of an action be evaluated and published. Cumulative effects (impacts) are the incremental impacts of an action when added to other past, present, and reasonably foreseeable future actions, regardless of what agency or person undertakes such other actions. In other words, an environmental assessment must determine if non-significant direct effects caused by implementation of the proposed action or any of the alternatives would become significant if considered in concert with other actions occurring within the area of interest, defined both geographically and temporally. Actions overlapping with or in close proximity to the proposed action would be expected to have more potential for an incremental impact than those more geographically separated. Similarly, actions that coincide, even partially, in time would tend to offer a higher potential for cumulative effects.

To identify cumulative effects, the analysis needs to address two fundamental questions:

1. Does a relationship exist such that affected resource areas of the proposed action or alternatives might interact with the affected resource areas of past, present, or reasonably foreseeable actions?
2. If such a relationship exists, then does an assessment reveal any potentially significant impacts not identified when the proposed action is considered alone?

4.7.2 Scope of Cumulative Effects Analysis

The scope of the cumulative effects analysis involves both the geographic extent of the effects and the time frame in which the effects could be expected to occur, as well as a description of what resources could potentially be cumulatively affected. Of all the issues and concerns presented and analyzed in this document, the only resource with the potential to be affected cumulatively was determined to be wetlands and waters of the U.S.

When addressing cumulative impacts to wetlands and waters of the U.S., the geographic extent for the cumulative effects analysis is the watershed in which the proposed action and alternatives have the potential to impact, primarily concentrating on past, present, and reasonably foreseeable actions on and within Moody AFB and the Grand Bay-Banks Lake ecosystem.

The time frame for cumulative effects analysis would center on the timing of the proposed action and would continue into the foreseeable future; additionally, actions with the potential to impact wetlands and waters of the U.S. that were implemented within the past four years would be included for analysis.

4.7.3 Past, Present, and Reasonably Foreseeable Actions

Numerous other activities, conducted by private and local, state, and federal government agencies, have been conducted on Moody AFB and within the Grand Bay-Banks Lake ecosystem during the past two years, and more actions are expected to continue into the future. For the purposes of analysis, only those actions with the potential to directly affect wetlands and waters of the U.S. will be addressed.

Past and Present Actions Relevant to the Proposed Action

- *Replacement of Water Control Structures, Banks Lake National Wildlife Refuge (NWR).* In 2002 the U.S. Fish and Wildlife Service (USFWS) replaced the main water control structure at Banks Lake NWR. Banks Lake NWR is located north-northeast of Moody AFB and forms the northern-most boundary of the Grand Bay-Banks Lake ecosystem.
- *Replacement of Water Control Structures, Grand Bay Wildlife Management Area (WMA).* In 2003 the Georgia Department of Natural Resources (DNR) relocated two water control structures on Dudley's Hammock within Grand Bay WMA. Grand Bay WMA consists of 5,800 acres of state-owned and AF-owned property in Lowndes and Lanier counties, Georgia.

Reasonably Foreseeable Actions Relevant to the Proposed Action

- *Private Residential Housing Construction.* Over the past five years, several single-family residential homes and subdivisions have been constructed within the Grand Bay-Banks Lake ecosystem. Construction has been extremely noticeable within the general area immediately south of Moody AFB near Bemiss Road, Studstill Road, and Knights Academy Road. It is anticipated that such construction would continue in the future as the population of Lowndes County continues to grow.
- *Commercial Property Construction.* Over the past five years, several commercial property sites have been developed in the Grand Bay-Banks Lake ecosystem, especially along the Bemiss Road corridor. Recent developments include fast-food restaurants, gas stations, and strip-malls. It is anticipated that commercial property development will continue along this corridor south of Moody AFB over the next several years.

- *Continued Management of Public Conservation Lands.* Two public conservation areas, the Grand Bay WMA (managed by the Georgia DNR) and the Banks Lake NWR (managed by the USFWS), are located within the Grand Bay-Banks Lake ecosystem immediately adjacent to Moody AFB. Wildlife conservation activities designed to promote the continued existence of native wildlife species will likely continue to be conducted on these areas in the future.
- *Stone Road Widening Project, Moody AFB.* Moody AFB prepared an environmental assessment and finding of no significant impact for the proposed widening of Stone Road, which is entirely located within the boundary of Moody AFB in Lowndes County. Under this proposal, 0.0321 acres of wetlands would be filled. The environmental analysis of this action resulted in a FONSI and FONPA that was signed on 14 January 2005.

4.7.4 Cumulative Effects Analysis

None of the identified past, present, or reasonably foreseeable actions have been determined to cause significant effects to wetlands or waters of the U.S. The replacement and relocation of water control structures on Banks Lake NWR and Grand Bay WMA resulted in small fills of wetlands, totaling less than one acre. However, the long range benefits of the projects, including improvements in the quantity and quality of wetland ecosystems with the Grand Bay-Banks Lake ecosystem, far outweigh the loss of one disjunct acre of wetlands. The filling of 0.0321 acres of wetlands under the Stone Road Widening Project was not considered significant when compared to the 8,000 acres of wetlands currently under the protection of Moody AFB. If the Proposed Action was implemented, the additional loss of up to 0.119 disjunct acres would not likely result in significant cumulative effects.

Construction, both private and commercial, would likely be restricted to upland areas near major roads. There would be no loss or direct impacts to wetlands or waters of the U.S. The greatest potential for effect as a result of construction activities would be increased erosion and sedimentation filling adjacent wetlands, and eutrophication related to increased septic inputs into the ecosystem. The Grand Bay Council, comprised of representatives from the USFWS, Georgia DNR, Moody AFB, The Nature Conservancy, and private landowners, are aware of the potential for wetland degradation as a result of unregulated construction in the area. This council is currently working with county and regional planners to ensure that environmental concerns are considered when property is proposed for development. Under the proposed action, potential erosion and sedimentation deposition in wetlands would be controlled through the implementation of BMPs. Therefore, there should not be any significant cumulative effects when the proposed action or the evaluated alternatives are considered in relation with private or commercial construction.

Table 4-1 -- Predicted effects of each of the alternatives

Issues/Concerns	Proposed Action (Replace Fence in Wetland Areas)	Alternative A (Divert Fence around Wetland Areas)	No Action Alternative
Air Resources	Temporary increase in emissions during construction. No significant effect.	Temporary increase in emissions during construction. No significant effect.	No significant effect.
Cultural Resources	No significant effect.	No significant effect.	No significant effect.
Soil Resources	Some slight soil compaction. No significant effect.	No significant effect.	No significant effect.
Vegetation Resources	About 18 acres of common south Georgia vegetation will be removed. No significant effect.	About 18 acres of common south Georgia vegetation will be removed. No significant effect.	No significant effect.
Wetlands and Waters of the U.S.	About 0.119 acres of wetlands would be filled. No significant effect.	No wetlands would be filled. However, DoD and AF regulations concerning maintaining boundary fence on jurisdictional boundary make this a non-practicable alternative.	No significant effect.

Issues/Concerns	Proposed Action (Replace Fence in Wetland Areas)	Alternative A (Divert Fence around Wetland Areas)	No Action Alternative
Wildlife Resources	Temporary disturbance. No significant effect.	Temporary disturbance. No significant effect.	No significant effect.
Cumulative Effects	No anticipated significant cumulative effects.	No anticipated significant cumulative effects.	No anticipated significant cumulative effects.

5.0 Permits and Required Consultations and Approvals

5.1 Storm Water. If either the proposed action or Alternative A were to be implemented, Moody AFB would have to obtain coverage under the State of Georgia General Permit No. GAR100001, Authorization to Discharge Under the National Pollutant Discharge Elimination System: Storm Water Discharges Associated with Construction Activity for Stand Alone Construction Projects. A Notice of Intent to discharge storm water under this permit and the applicable fee must be forwarded to the Georgia Department of Natural Resources (GDNR) and the Lowndes County Engineering Department prior to implementation of either action. The provisions of the permit, including required water monitoring and maintenance and monitoring of erosion and sedimentation control best management practices, must be followed until the disturbed soil receives permanent stabilization. Following completion of the project, a Notice of Termination must be filed with the GDNR.

5.2 Georgia Erosion and Sedimentation Control Act. If either the proposed action or Alternative A were to be implemented, a Lowndes County Land Disturbing Permit would have to be obtained. A permit application, including an Erosion and Sedimentation Control Plan, would have to be forwarded to the Lowndes County Engineering Department along with any applicable permit fees prior to ground-breaking activities.

5.3 Section 404D, Clean Water Act. If the proposed action was to be implemented, the Regulatory Branch of the U.S. Army Corps of Engineers would have to be consulted to determine if the action is exempted from the requirements to obtain a permit under the Clean Water Act or if the installation should seek to obtain coverage under Nationwide Permit #25, Structural Discharges.

5.4 Executive Order 11990, *Protection of Wetlands*. If the proposed action was to be implemented, a Finding of No Practicable Alternative would have to be approved by HQ, AFSOC, prior to any disturbances in wetlands.

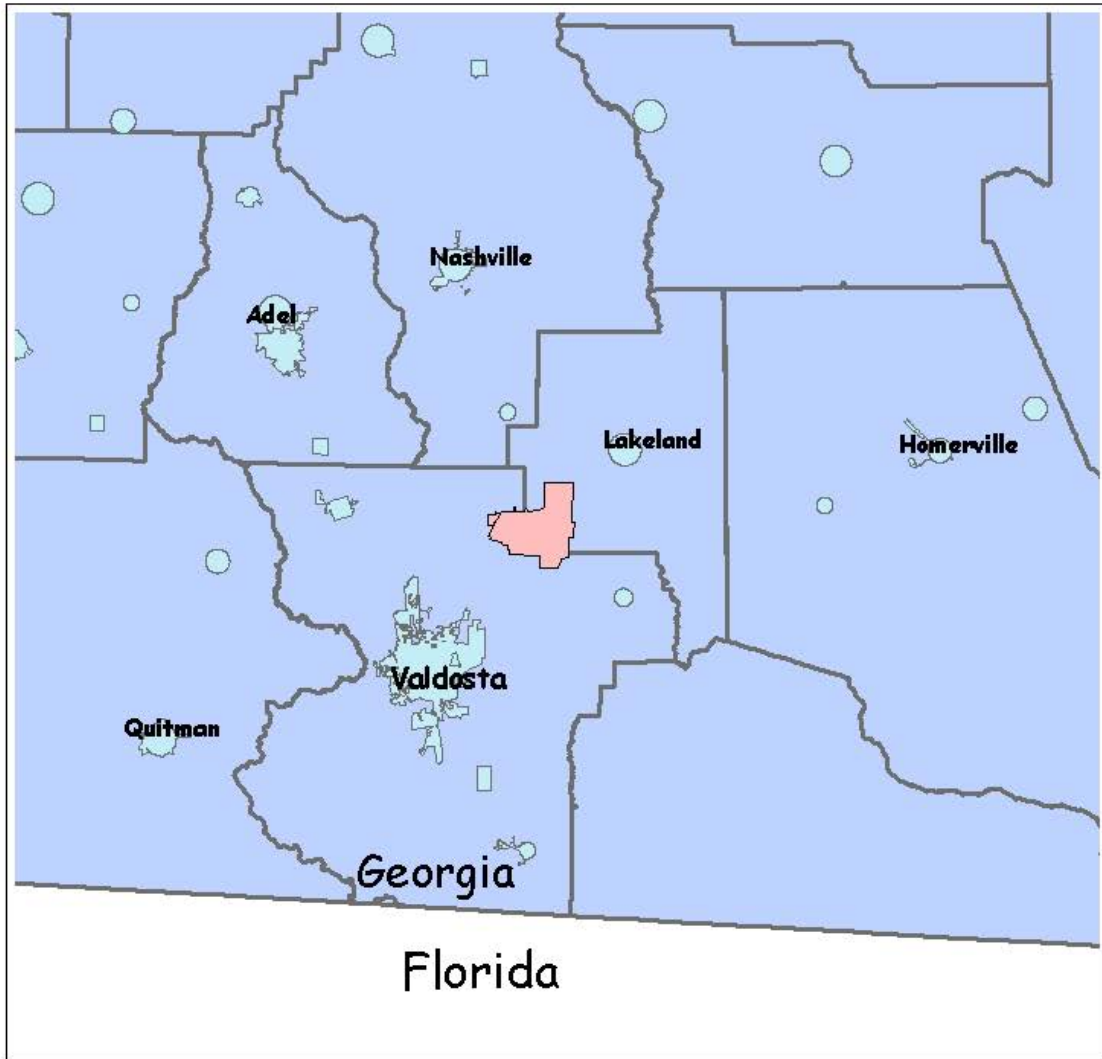
5.5 National Historic Preservation Act. In accordance with Section 106 of the National Historic Preservation Act, if either the proposed action or Alternative A were to be implemented, the State Historic Preservation Office would have to be consulted prior to the implementation of any ground disturbance.

6.0 Public Notification and Review

In accordance with 32 CFR 989 and 347 RQW/JA directives, the following organizations were afforded the opportunity to review and comment on an earlier draft of this document along with the general public:

- City of Valdosta
- Lowndes County Board of Commissioners
- Georgia State Historic Preservation Office
- Georgia State Clearinghouse

Moody AFB General Location

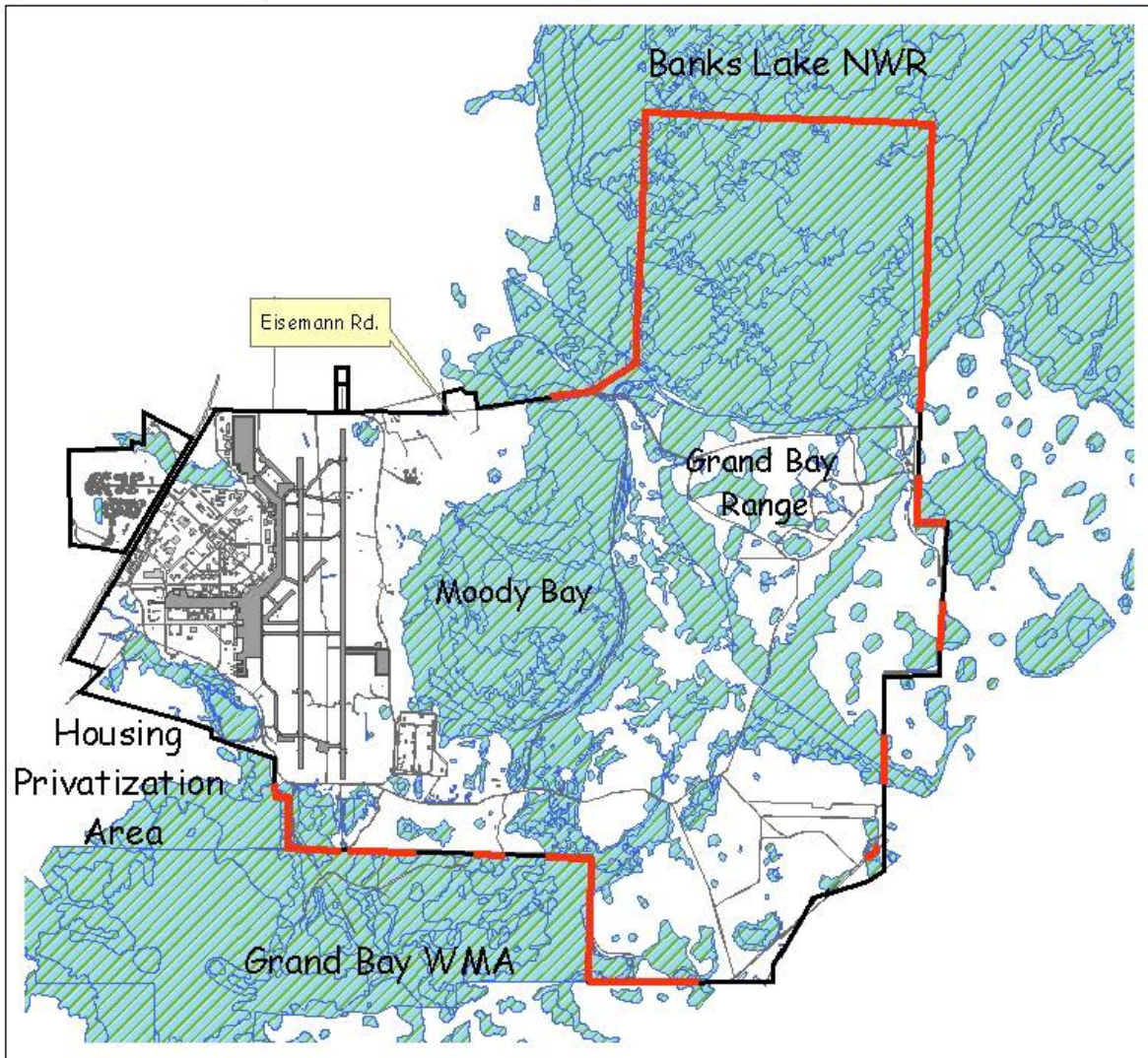


Legend



Figure 1

Proposed Project Location



Legend

- Project Location
- Wetlands
- Installation Boundary



Figure 2