FINDING OF NO SIGNIFICANT IMPACT (FONSI)
for the
Final Environmental Assessment Addressing the Establishment of Urban Close Air Support (CAS) Air and Ground Training Spaces near Mountain Home Air Force Base, Idaho

Purpose of and Need for the Proposed Action

Purpose. The purpose of the Proposed Action is to ensure F-15E and F-15SG aircrews from the 366 FW can conduct Urban CAS proficiency training to identify, track, and perform in-air laser designation of targets within the full range of urban ground and airspace environments with ground support from Joint Terminal Attack Controllers (JTACs). Fully practicing the laser designation processes in varied urban settings is critical. Without this element of training, gaining a practical understanding of, and operational familiarity with, the environmental challenges that can disrupt the laser targeting efforts cannot occur. This would result in "negative training," or training that is inadequate to a point that it would compromise mission safety and survivability during combat. Only this combination of training conditions would adequately simulate the current mission realities of urban combat.

Need. Urban CAS is comprised of air and ground assets working as one operating unit integrally-linked in all communication and coordination efforts to identify, track, and neutralize threats. The successes of Urban CAS missions hinge on the proficiency and operational readiness of air and ground teams who coordinate and execute them. To be adequately prepared for combat, increase the survivability of air and ground teams (i.e., JTACs), and avoid collateral damage to civilians, aircrews and JTACs must train fully and intensively together in urban settings that realistically simulate the urban environments encountered in combat. The Proposed Action is needed because there are no designated urban environments that can be reliably used by F-15E and F-15SG aircrews and ground support teams to fulfill the Urban CAS aircrew proficiency-training requirement.

Description of the Proposed Action and Alternatives

Proposed Action. USAF proposes to establish ground and airspace training areas in urban centers near Mountain Home AFB to accommodate Urban CAS proficiency training operations by F-15E and F-15SG aircrews of the 366th Fighter Wing with ground support from Joint Terminal Attack Controllers. Once these air and ground spaces are identified and use is coordinated, USAF would redistribute the existing Urban CAS training operations among the nine selected urban centers (including Mountain Home AFB).

The proposed training operations would be limited to coordinated flight and ground tracking, identification, locating, and completion of an electronically simulated engagement of designated targets across a range of large, medium, and small urban centers. Targets would be designated from the aircraft using low-power, eye-safe lasers. Aircraft would be flown at an altitude of 10,000 to 18,000 feet above ground level within a 30-nautical mile operating area for each urban center. Ground teams would support flight tracking within the ground area directly underlying the operational airspace using radio communication equipment. Realistic Urban CAS training requires that all members of each ground support team behave in a manner typical of any community member to avoid drawing attention to themselves or the operations. Thus,
ground support personnel would be unarmed and dressed in plain clothes. Members of each ground support team would be inside civilian vehicles driving along paved streets and paved roadways during training operations. To facilitate aircrew tracking of identified targets, ground support may stop along the side of a paved roadway in areas that provide broad lines of sight. Ground support personnel may be positioned on publicly accessible paved roads located anywhere within the ground operating area, such as in vehicles driving along streets or parked along the side of a road. Individuals among the ground teams may momentarily exit the vehicle onto sidewalks or in parking lots to establish or re-establish communications with aircrews. Ground support would not interfere with civilian traffic or pedestrians. All activities would be conducted in accordance with local laws and ordinances and with the goal of leaving no trace of their activities.

**Proposed Action Alternative.** USAF would conduct the proposed Urban CAS aircrew proficiency training activities as described under the Proposed Action at the following nine urban center site alternatives: Boise, Mountain Home, Burley, Twin Falls, Grand View, Bruneau, Glens Ferry, Hammett, and Mountain Home AFB, Idaho. These urban centers are considered adequate to accommodate the proposed Urban CAS training because they: 1) are located proximally to the installation; 2) have the population sizes and densities to simulate the community dynamics of vehicle and pedestrian traffic; 3) are physically distinct from other urban centers and have the attributes required to simulate various populated urban environments; and, 4) have development features indicative of artificial lighting to simulate the range of built environments encountered during combat.

**No Action Alternative.** USAF NEPA regulations require consideration of the No Action Alternative. The No Action Alternative serves as a baseline against which the impacts of the Proposed Action and other potential action alternatives can be evaluated. Under the No Action Alternative, USAF would not conduct Urban CAS proficiency training operations with ground support in urban centers around southern Idaho. Instead, Urban CAS aircrew proficiency training would continue to be conducted only on Mountain Home AFB and in the Mountain Home Range Complex (MHRC). Although aircrews would gain some benefit from coordinated ground and flight mission training on the installation and within the MHRC, neither of these assets would accommodate the required fidelity and challenges required to maintain actual proficiency and operational readiness, or to ensure increased survivability of air and ground teams in the Urban CAS combat environment.

The MHRC does not have the required population, vertical development, or artificial lighting to adequately simulate a medium or large urban environment. In fact, the MHRC does not have any capability to simulate the dynamic environment of an urban community. Urban areas provide real-time considerations, much like deployed operations, to ensure the mission would be executed without involving noncombatants and minimizing collateral damage. Further, although the installation and MHRC do have limited vertical development, they do not adequately simulate the challenges presented by the urban canyons of medium and large urban centers that are created by buildings of varying shapes and sizes. This unique problem presents multiple challenges associated with finding and tracking points of interest. Lastly, different levels and types of lighting are difficult to simulate on the MHRC. To provide artificial lighting that would adequately simulate the medium or large urban environment on the MHRC would require development of buildings with lighting infrastructure on the existing gunnery
ranges. To preserve the life of the added lighting infrastructure required for Urban CAS training, the installation would have to limit weapons employment training operations on the gunnery ranges. Because the No Action Alternative fails to meet the purpose of and need for the Proposed Action it is not a viable alternative.

Summary of Environmental Effects

The analysis of environmental effects focused on the following environmental resources: noise, air quality, airspace management, land use, cultural resources, and health and safety. A cumulative effects assessment was also conducted. Details of the environmental consequences can be found in the attached Final Environmental Assessment Addressing the Establishment of Urban Close Air Support (CAS) Air and Ground Training Spaces near Mountain Home Air Force Base, Idaho. The analysis in the EA for each of the environmental resource areas previously noted identified negligible to minor adverse effects under the Proposed Action. Potential environmental effects are not expected to be significant.

Conclusion

Based on the description of the Proposed Action as set forth in the EA, all activities were found to comply with the criteria or standards of environmental quality and were coordinated with the appropriate federal, state, and local agencies. The Draft EA and this FONSI were made available to the public for a 30-day review period. The USAF coordinated with agencies, stakeholders, and the public throughout the EA development process. All comments received were considered, as appropriate, and incorporated into the analysis of potential environmental impacts performed as part of the EA.

Finding of No Significant Impact

Based on: 1) the information and analysis presented in the attached EA, which was prepared in accordance with the requirements of the: National Environmental Policy Act, the Council on Environmental Quality regulations, implementing regulations set forth in 32 Code of Federal Regulations § 989 (Environmental Impact Analysis Process), as amended, and 2) review of the public and agency comments submitted during the 30-day public comment period, I conclude that implementation of the Proposed Action Alternative would not result in significant environmental impacts, and preparation of an Environmental Impact Statement is unnecessary, and that signing this FONSI completes the environmental impact analysis process.

[Signature Block]

Date 7 Nov 2018

Attachment: Final Environmental Assessment Addressing the Establishment of Urban Close Air Support (CAS) Air and Ground Training Spaces near Mountain Home Air Force Base, Idaho