

FINDING OF NO SIGNIFICANT IMPACT (FONSI)
CONSTRUCTION OF A NEW NATHAN TWINING SCHOOL AND DEMOLITION OF THE EXISTING
CARL BEN EIELSON SCHOOL AND EXISTING NATHAN TWINING ELEMENTARY AND MIDDLE
SCHOOL – GRAND FORKS AIR FORCE BASE, NORTH DAKOTA

Pursuant to provisions of the *National Environmental Policy Act 1969* ([42 United States Code § 4321](#) et seq.) (NEPA), as amended by the *Fiscal Responsibility Act of 2023* ([Public Law 118-5](#)), the United States (US) Department of Defense NEPA implementing procedures issued 30 June 2025, and Executive Order (EO) 14154, *Unleashing American Energy* (20 January 2025), the US Department of the Air Force (DAF) and Grand Forks Air Force Base Public School District (GFAFBPSD) assessed the potential impacts on the human environment, including the natural environment, associated with construction of a new Nathan Twining School and demolition of the existing Carl Ben Eielson School and existing Nathan Twining Elementary and Middle School, Grand Forks Air Force Base (GFAFB), North Dakota. Both Carl Ben Eielson School and Nathan Twining Elementary and Middle School are located within GFAFB.

Purpose and Need

The purpose of the Proposed Action is to provide safe and secure school facilities, utilizing funding specifically authorized by Section 8108 of the *Consolidated Appropriations Act of 2023* ([Public Law 117-328](#)) that support, rather than detract, from a positive learning environment and that can grow over the next 30 years to support the increase in personnel and their dependents associated with GFAFB's and GrandSKY Business Park's growing missions. Under [Public Law 114-328](#), the Office of Local Defense Community Cooperation (OLDCC) executes assistance on behalf of the US Department of Defense (DoD) to support the design, site preparation, and construction of schools on the Public Schools on Military Installations prioritized list; Nathan Twining Elementary and Middle School is number 70 on this list. Using funds provided by OLDCC, the updated facilities would meet current Unified Facilities Criteria and DoD antiterrorism/force protection (AT/FP) standards, would have the capacity to accommodate approximately 500 students, and would adhere to functional safety standards such as heating, cooling, and facility upgrades and repairs. Since Carl Ben Eielson School was closed in 2014, Nathan Twining Elementary and Middle School has been the sole operational GFAFBPSD school on GFAFB.

The Proposed Action is needed because the current Nathan Twining Elementary and Middle School is not structurally sound, does not meet DoD AT/FP security standards for an educational facility, and does not have the capacity to support an increase in GFAFB personnel and their dependents. In 2018, a facility condition assessment report (FCAR) was conducted to evaluate the existing Nathan Twining Elementary and Middle School. The FCAR determined that the facility had a rating of Q4,¹ the lowest FCAR rating, indicating that the building is in poor condition. The FCAR revealed multiple building systems that were in disrepair beyond the ability to repair and/or renovate.

The Proposed Action is also needed to support GFAFBPSD's objectives to promote a positive learning environment and provide additional facilities to accommodate an increasing number of students beyond the existing facilities' capacity. As of September 2023, the enrollment at Nathan Twining Elementary and Middle School was 294 students from pre-kindergarten through grade 8. Enrollment at installation schools fluctuates, as their primary enrollment is based on the number of active military members residing on the respective military base.

Currently, 145 GFAFB-affiliated students in kindergarten through grade 8 reside in Grand Forks rather than on Base due to the limited available on-Base housing. As a result, these students attend Grand Forks School District (GFSD) #1 schools rather than GFAFBPSD schools. Additionally, there are 30 homeschooled students residing on GFAFB who may choose to enroll part-time or full-time within GFAFBPSD. The district demographer has projected an enrollment increase of 56 students by the 2027/2028 school year. Growth in and around GFAFB, including the expansion of Space Development

¹ The 2018 Facility Condition Assessment Report (FCAR) indicated that the current condition (2018) of Nathan Twining Elementary and Middle School is Q3, with a projected fiscal year 2023 rating of Q4. This report assumes that the facility has continued to degrade as predicted in the FCAR and now has a rating of Q4.

Agency operations and ongoing development at the GrandSKY Business Park, is expected to bring more personnel to the area. GrandSKY Business Park alone anticipates more than 240 additional employees, which may further impact student enrollment at Nathan Twining Elementary and Middle School. Increased school capacity would support the need for increased on-Base housing related to the demands of new and emerging mission objectives.

Description of Proposed Action and Alternatives

The Proposed Action would involve a three-step sequential process: 1) demolition of the unused, vacant Carl Ben Eielson School, 2) construction of a new Nathan Twining School campus, and 3) demolition of the existing Nathan Twining Elementary and Middle School. The new Nathan Twining School campus would include a new school, parking, drop-off lanes, and an athletic field. The new approximately 100,000-square-foot, two-story school would be constructed to accommodate up to 500 students and would incorporate flexibility to support evolving mission requirements and potential growth beyond 30 years. The existing Nathan Twining Elementary and Middle School would remain in use throughout the demolition of Carl Ben Eielson School and construction of the new Nathan Twining School campus. Upon completion of the new campus, the existing Nathan Twining Elementary and Middle School would be demolished.

No Action Alternative

Under the No Action Alternative, the status and use of the closed Carl Ben Eielson School and existing Nathan Twining Elementary and Middle School would not change. Carl Ben Eielson School would remain unused, and Nathan Twining Elementary and Middle School would remain out of compliance with AT/FP security standards. Nathan Twining Elementary and Middle School would continue to operate under unsafe and unsuitable conditions for students and staff.

Further, the No Action Alternative would leave Nathan Twining Elementary and Middle School with enrollment demand beyond its capacity and would not support GFAFBPSD's projected growth over the next 30 years. The additional 145 students in kindergarten through grade 8 that reside in Grand Forks and attend GFSD #1 schools would not have the opportunity to attend a school on GFAFB. The No Action Alternative would not utilize funding available through Section 8108 of the *Consolidated Appropriations Act of 2023* ([Public Law 117-328](#)).

Summary of Findings

Potentially affected environmental resources were identified through communications with state and federal agencies and review of past environmental documentation. The attached Environmental Assessment (EA) analyzes potential environmental consequences of the following resource areas: land use; safety and occupational health; air quality and greenhouse gases; biological resources; water resources; geology and soils; cultural resources; hazardous materials and waste, toxic substances, and contaminated sites; infrastructure, including transportation and utilities; noise; socioeconomics; and protection of children.

Land Use

Implementation of the Proposed Action would be consistent with existing land use. No impacts to land use would be expected to occur.

Safety and Occupational Health

Implementation of the Proposed Action would result in no impacts to flight safety, explosives safety, or bird/wildlife aircraft strike hazards would be expected to occur. Short-term, minor, adverse and long-term, minor, beneficial impacts to ground and construction safety would be anticipated to occur from construction and demolition activities that provide necessary upgrades to GFAFBPSD education facilities. Further, long-term, moderate, beneficial impacts to ground safety would occur due to AT/FP compliance; improved traffic signage, traffic markings, crosswalk lighting; and security upgrades at the new Nathan Twining School.

Air Quality and Greenhouse Gases

Implementation of the Proposed Action would result in short-term, minor, adverse impacts to air quality from construction and demolition activities. Impacts to air quality would not be considered significant.

Biological Resources

GFAFBPSD has determined that the Proposed Action would have “no effect” on federally threatened or endangered species or critical habitat. The US Fish and Wildlife Service does not consult on “no effect” determinations. Implementation of the Proposed Action would result in short-term, negligible, adverse impacts and long-term, minor beneficial impacts to vegetation and short-term, minor, adverse impacts to wildlife. Potential impacts resulting from invasive plants and noxious weeds would be minimized through construction best management practices and potential impacts would be localized to the previously developed project sites that would be revegetated with approved plant species reducing the potential for invasive species; therefore, long-term, negligible beneficial impacts to invasive plants and noxious weeds would be expected.

Water Resources

Implementation of the Proposed Action would result in no impacts to surface water, wetlands, or floodplains. Although short-term, minor, adverse impacts to stormwater would be expected to occur. However, the Proposed Action would result in long-term, minor, beneficial impacts to stormwater from improved site drainage. Implementation of the Proposed Action would result in a reduction of overall impervious surfaces within GFAFB. Implementation of the Proposed Action would have the potential to result in long-term, minor, beneficial impacts to groundwater from the removal of abandoned heating fuel underground storage tanks at the project sites, decreased impervious surfaces, and improved groundwater recharge.

Geology and Soils

Implementation of the Proposed Action would result in long-term, minor, adverse impacts to topography, short-term, negligible, adverse and long-term, minor, beneficial impacts to soils, and no impacts to geology. Implementation of the Proposed Action would result in a reduction of overall impervious surfaces within GFAFB, reducing potential erosion and offsite transportation of sediments.

Cultural Resources

The demolition of Carl Ben Eielson School would result in a direct, major, and irreversible adverse effect on historic architectural resources, as it would result in the complete loss of a property eligible for listing in the National Register of Historic Places. The adverse effect would be mitigated through a Memorandum of Agreement among the DAF, the State Historic Preservation Office, and GFAFBPSD. The Memorandum of Agreement was signed by all parties on 18 April 2025. Compliance with the Memorandum of Agreement would result in successful mitigation of historic places, in accordance with 36 CFR § 800.6. There are no archaeological resources or Traditional Cultural Properties within the project area.

Hazardous Materials and Waste, Toxic Substances, and Contaminated Sites

Implementation of the Proposed Action could result in short-term, minor, adverse impacts to hazardous materials and wastes from construction and demolition operations. There would be long-term, moderate, beneficial impacts from the removal of asbestos-containing materials and lead-based paint. Long-term, minor, beneficial impacts to petroleum products would also be anticipated, and short-term, minor, adverse impacts to pesticide management could occur. There would be no impacts to polychlorinated biphenyls, radon, per- and polyfluoroalkyl substances, or environmental restoration sites.

Infrastructure, including Transportation, and Utilities

Implementation of the Proposed Action would result in short-term, negligible, adverse impacts to transportation and communications systems, electricity, natural gas, potable water, and sanitary sewage infrastructure. There would be long-term, negligible, beneficial impacts to transportation systems by locating

the new school closer to the main gate. The Proposed Action would result in short-term, minor, adverse impacts to solid waste management.

Noise

Implementation of the Proposed Action would result in short-term, minor, adverse impacts to noise from intermittent daily construction and demolition activities. The new Nathan Twining School would be located outside of the 65-decibel noise contours associated with the GFAFB airfield.

Socioeconomics

Implementation of the Proposed Action would result in no impacts to population; long-term, minor, beneficial impacts to employment and housing; and short- and long-term, minor, beneficial impacts to employment. Long-term, moderate, beneficial impacts to education would be expected from the improved educational facilities and increased capacity for student enrollment in DoD Education Activity facilities, as well as by potentially freeing up space and resources in GFSD #1 schools.

Protection of Children

Implementation of the Proposed Action would result in long-term, moderate, beneficial impacts related to the protection of children by providing students with a safe and suitable educational facility while removing the risk of potential exposure to asbestos-containing material and lead-based paint. There would be no disproportionate, adverse impacts to children.

Cumulative Impacts

The EA considered cumulative impacts, which are effects on the environment that result from the incremental effects of the Proposed Action when added to the effects of other past, present, and reasonably foreseeable actions at Grand Forks AFB.

Under the Proposed Action, beneficial cumulative effects to safety and occupational health, water resources, and socioeconomics would be anticipated to occur. When considered in conjunction with the incremental effects of other past, present, and reasonably foreseeable actions at GFAFB, no significant cumulative effects would be anticipated to occur with implementation of the Proposed Action.

Mitigation

The EA analysis concluded that the Proposed Action would result in a direct, major, and irreversible adverse effect on historic architectural resources, as it would result in the complete loss of a property eligible for listing in the National Register of Historic Places. The adverse effect would be mitigated through a Memorandum of Agreement among the DAF, GFAFBPSD, and the State Historic Preservation Office.

Public Review

GFAFBPSD published a notice of availability of the Draft EA and Draft FONSI on 4 and 7 June 2025 in the *Grand Forks Herald* to commence the 30-day public comment period for the Draft EA and Draft FONSI. During the public comment period, the DAF received a comment from the North Dakota Department of Water Resources. **Sections 3.8.2.5 and 3.8.3.2** of the EA were updated to address this comment. This comment as well as all communications to the public are provided in **Appendix A** of the EA.

Conclusion

Finding of No Significant Impact. After review of the attached EA prepared in accordance with the requirements of NEPA, I have determined that with the mitigations and best management practices outlined herein, the Proposed Action would not have a significant impact on the quality of the human environment, including the natural environment. Accordingly, an Environmental Impact Statement will not be prepared.

MATTHEW T. OLSON, Lt Colonel, USAF
Chief, Civil Engineer Division
HQ ACC/A4C, JBLE

DATE