

**DRAFT FINDING OF NO SIGNIFICANT IMPACT (FONSI)  
AND  
DRAFT FINDING OF NO PRACTICABLE ALTERNATIVE (FONPA)  
ENHANCED USE LEASE DEVELOPMENT – GRANDSKY BUSINESS PARK – GRAND FORKS AIR  
FORCE BASE, NORTH DAKOTA**

Pursuant to provisions of the *National Environmental Policy Act* (NEPA), Title 42 *United States Code* Section 4321 et seq., implemented by Council on Environmental Quality (CEQ) regulations at Title 40, Code of Federal Regulations (CFR) Parts 1500–1508, and 32 CFR Part 989, *Environmental Impact Analysis Process (EIAP)*, the Department of the Air Force (DAF) assessed the potential impacts on the human environment, including the natural environment, associated with enhanced use lease development at GrandSKY Business Park, Grand Forks Air Force Base, North Dakota.

GrandSKY Business Park was developed following the DAF 2014 *Environmental Assessment of Proposed Mixed-Use Business Park on an Enhanced Use Lease* (EUL) at Grand Forks Air Force Base (GFAFB), North Dakota. Grand Forks County now proposes additional development within the EUL. As described in greater detail below, the Proposed Action would develop up to approximately 7,130,000 square ft (ft<sup>2</sup>) of new impervious surfaces across eight functional land use categories within the GrandSKY Business Park.

**Purpose and Need**

The purpose of the Proposed Action in this Environmental Assessment (EA) is to support mission objectives and accommodate the growing tenant desire to reside within GrandSKY Business Park for uncrewed aerial systems (UAS)-related actions. Since the 2014 EA was signed, commercial interest has exceeded expectations and additional development within the boundaries of the EUL is proposed. Grand Forks County would work with private developers to further develop GrandSKY, offering advantages of proximity to an Air Force Base with the flexibility and responsiveness of a private development.

The need for the Proposed Action is to support the DAF's strategic goal of optimizing the value of its existing real property assets. The development activities would promote the efficient and economical use of real property assets at GFAFB pursuant to the directives of Executive Order (EO) 13327, *Federal Real Property Asset Management*. In seeking development of this property, GFAFB is also pursuing objectives outlined in the 14 February 2007, DAF memorandum, *Pursuing "Value-Based" Transactions Involving Air Force Real Property Assets*. This memorandum directs the DAF to optimize the value of real property assets using authorized tools such as the EUL program.

The Proposed Action in this EA is also needed to support GFAFB's mission objectives and promote continued economic development within Grand Forks County by providing up to 9,452,600 ft<sup>2</sup> (217 acres) of developable area for increased commercial interest in UAS manufacturing, training, and development within proximity to an airfield. Further developing GrandSKY may promote partnerships that would help reduce costs, improve readiness, and help fill the growing need for UAS pilots, maintenance technicians, sensor operators and developers, and data analysts and managers. Additional need is derived from GFAFB's desire to reduce hazards associated with wetlands, which are a natural draw for wildlife, in the vicinity of the airfield and establish a safe bird/wildlife aircraft strike hazard (BASH) environment. Development within GrandSKY Business Park may result in filling of wetlands within the GrandSKY property, which may reduce the amount of attractive habitat for wildlife in the vicinity of the airfield and support safety compliance with Department of the Air Force Instruction (DAFI) 91-212, *Bird/Wildlife Aircraft Strike Hazard (BASH) Management Program*.

**Description of Proposed Action and Alternatives**

The Proposed Action proposes a full build-out and development of GrandSKY Business Park to accommodate existing and future demand for aviation mixed-use, light industrial, administrative, and commercial facilities. A full build-out of this property would include increased pavements, in addition to the existing paved taxiway, apron, and existing buildings, depending on prospective tenant needs. As the exact tenant requirements are unknown, the Proposed Action proposes to utilize a functional land use category approach to determine the estimated amount of impervious surface coverage that would occur under each

functional land use category. A functional land use category approach allows this EA to analyze potential impacts of development to resource areas with the assumption that maximum impervious (developed) area is not exceeded for that category. Except as described below for the No Action Alternative, no other alternatives were carried forward for further consideration.

### **No Action Alternative**

Under the No Action Alternative, development at GrandSKY Business Park would remain unchanged from the development thresholds evaluated in the US DAF 2014 *Environmental Assessment of Proposed Mixed-Use Business Park on an Enhanced Use Lease at Grand Forks Air Force Base, North Dakota*. Mission objectives would not be met through GrandSKY Business Park and the growing tenant desire to reside within the GrandSKY Business Park for UAS-related actions would not be accommodated. Continued economic development within Grand Forks County through increased commercial interest in UAS manufacturing, training, and development within proximity to an airfield would not occur.

While the No Action Alternative would not satisfy the purpose of and need for the Proposed Action, this alternative is retained for further consideration in the attached EA to provide a comparative baseline against which to analyze the effects of the Proposed Action, as required under CEQ and DAF regulations (40 CFR § 1502.14(c) and 32 CFR § 989.8(a), respectively).

### **Summary of Findings**

Potentially affected environmental resources were identified through communications with state and federal agencies and review of past environmental documentation. The attached EA analyzed potential environmental consequences of the following resource areas: land use; safety; air quality; biological, water, and cultural resources; geology and soils; hazardous materials and wastes, toxic substances, and contaminated sites; infrastructure, including transportation and utilities; noise; and socioeconomics.

#### ***Land Use***

Long-term, beneficial impacts to land use would be anticipated to occur under the Proposed Action because the assignment of functional land use categories and maximization of developable area supports the DAF's strategic goal of optimizing the value of its existing real property assets.

#### ***Safety***

No impacts to explosives safety, negligible-to-minor adverse impacts to flight safety and ground safety, and long-term, beneficial impacts to BASH safety would occur. Under the Proposed Action, BASH safety would support compliance with DAFI 91-202, *The US Air Force Mishap Prevention Program* (2023), and DAFI 91-212, *Bird/Wildlife Aircraft Strike Hazard (BASH) Management Program*, regarding airfield vegetation.

#### ***Air Quality***

Less-than-significant effects on air quality would be anticipated from implementing the Proposed Action. The Proposed Action would result in long-term, negligible, direct, adverse impacts to air quality within GFAFB and surrounding environs. No new stationary sources of air emissions would be anticipated under the Proposed Action. The addition of any new stationary sources in the future would need to comply with air quality permitting and operating requirements that apply to GFAFB.

#### ***Biological Resources***

The DAF has determined the Proposed Action would have “no effect” on federally threatened or endangered species or critical habitat. Approximately 0.40 acre of habitat in the northwest corner of the Proposed Action area has been identified as containing white lady's slipper, which is a state species of conservation priority. Under the Proposed Action, this area would be occupied by the proposed mixed-use development and this plant population would have the potential to be uprooted and removed as a result of future construction. Long-term, moderate, adverse impacts would have the potential to occur as a result of the removal of existing natural vegetation and wetlands.

### ***Water Resources***

There would be no impacts to surface waters under the Proposed Action; wetlands are analyzed separately in the EA. Under the Proposed Action, up to 25 acres of wetlands would have the potential to be filled, resulting in a significant impact to wetlands. Wetland removal would decrease habitat, landscape diversity, and connectivity among aquatic resources. Permanent, adverse impacts to wetlands would occur under the Proposed Action. Because Grand Forks County would purchase adequate wetland mitigation credits to offset the unavoidable wetland impacts and strictly adhere to all applicable permit conditions and best management practices (BMPs) defined in the attached EA and associated Appendix E, the overall impacts of the Proposed Action on wetlands would be reduced to levels that are less than significant.

With the use of design standards to manage increases in stormwater runoff, long-term, minor impacts to stormwater would have the potential to occur under the Proposed Action. Stormwater contamination would be minimized through the use of BMPs during construction.

Contaminated stormwater runoff would have the potential to adversely impact groundwater resources. The use of BMPs and compliance with existing regulations would help to reduce impacts to groundwater resources at GrandSKY Business Park. Long-term, minor, adverse impacts to groundwater would occur under the Proposed Action.

There are no floodplains located within the project area. However, floodplains associated with the Turtle River, northwest of the project area, would have the potential to be impacted as the Proposed Action would increase impervious surfaces at GrandSKY Business Park by up to 199 acres at complete build-out. Under the Proposed Action, long-term, minor, adverse impacts to floodplains would occur.

### ***Geology and Soils***

No direct or indirect impacts to geology would be anticipated to occur with implementation of the Proposed Action. Implementation of the Proposed Action would not require large-scale alteration of topography to accommodate construction; therefore, the Proposed Action would have negligible, short-term, adverse impacts to topography.

Increased impervious surfaces constructed under implementation of the Proposed Action would result in more stormwater runoff in areas where poorly drained soils are exposed. With the implementation of techniques and BMPs, adverse impacts to soils from implementation of the Proposed Action would be anticipated to be long-term and minor.

### ***Cultural Resources***

No impacts to archaeological properties, architectural properties, or traditional cultural properties would occur under the Proposed Action. No properties listed or eligible for listing on the National Register of Historic Places are located within the Region of Influence.

### ***Hazardous Materials and Wastes, Toxic Substances, and Contaminated Sites***

The use of certain hazardous materials (HAZMAT) and wastes would be required during activities associated with the Proposed Action, as identified in the attached EA. Short-term, negligible impacts could occur due to the use of HAZMAT during activities associated with the Proposed Action.

Approximately 4 acres of an Installation Restoration Program (IRP) site associated with an aqueous film forming foam release falls within the boundary of the Proposed Action. In the event of construction occurring near the IRP site, contaminated soil and/or construction debris would be handled, stored, and disposed of in accordance with federal and state laws and regulations. All applicable permits for handling and disposal of contaminated soil and construction debris would be obtained prior to commencement of construction activities. The site would continue to be monitored throughout construction and development of GrandSKY Business Park. With adherence to applicable federal and state law and regulations, potential impacts would be short term and minor.

Increased impervious surfaces between the Alpha and Charlie GFAFB airfield ramps and the West Ditch would provide the potential connectivity for contaminated runoff to reach the West Ditch and discharge into the Turtle River. However, contamination associated with runoff of the ramps would not be likely to occur in any quantifiable amounts beyond current conditions.

It is possible that new facilities under the Proposed Action could have indoor radon screening levels greater than 4 pCi/L. Radon would be managed in new construction and post construction by incorporating passive features into the design that limit the ability for radon to enter buildings.

Under the Proposed Action, there could be an increase in the number of pesticides, herbicides, fungicides, insecticides, and rodenticides used. Use of pesticides, herbicides, fungicides, insecticides, and rodenticides post construction would be conducted on an as-needed basis consistent with federal, state, and local regulations, and in compliance with the North Dakota Pesticide Use Permit.

### ***Infrastructure, Including Transportation and Utilities***

Any increased demand on utilities systems would be accommodated through existing available capacity. Therefore, long-term, negligible impacts would be expected to occur under the Proposed Action. The City of Grand Forks Municipal Landfill would be expected to have sufficient capacity to support construction-related waste.

Long-term, beneficial impacts to the transportation system would be expected from the projects under the Proposed Action by creating additional roadway connectivity within the GrandSKY Business Park. Under the Proposed Action, up to 80 percent of the land designated for roadway corridors would be developed, accounting for approximately 450,000 ft<sup>2</sup> of impervious surfaces.

### ***Noise***

Impacts from noise would be anticipated to be long term and minor. Noise associated with construction would occur over the 10-year construction period. Operations at GrandSKY Business Park would increase over that time and eventually stabilize to steady state. Noise would not exceed noise thresholds in the vicinity.

### ***Socioeconomics***

Due to the projected long-term availability of jobs that would be created from the expanded development of the Business Park, the population of Grand Forks County would be expected to increase. Under the Proposed Action, the majority of the directly related jobs would be expected to be in the professional, scientific, management, and educational services sectors. In addition, the influx of employees and their families to fill directly related jobs would drive the creation of indirectly related jobs in such areas as retail, food services, and real estate.

Median individual and household income could increase somewhat in the ROI and Grand Forks County as the percentage of employment shifts to higher-paying professional, scientific, and management jobs. Implementation of the Proposed Action would be anticipated to result in long-term, beneficial impacts to employment, income, and tax revenues within the ROI.

The additional development and construction of GrandSKY Business Park could generate a need for more housing development. Under the Proposed Action, short-term, minor impacts to housing would occur, while long-term, negligible impacts to housing would occur if housing development continued to be constructed to meet demands.

Long-term, negligible impacts to education, law enforcement, and fire protection would be anticipated to occur under the Proposed Actions.

### **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 impacts to land use and socioeconomics would be anticipated to occur. Grand Forks County would adhere to all terms required under any Section 404 permit for the Proposed Action and would mitigate unavoidable impacts to wetlands where required under the *Clean Water Act*. When considered in conjunction with the effects of past loss of wetland and grassland habitat and any reasonably foreseeable future actions, the Proposed Action would have moderate adverse cumulative impacts to water resources and biological resources following the implementation of BMPs and mitigation efforts.

### **Mitigation**

The EA analysis concluded that the Proposed Action would result in significant environmental impacts to wetlands; therefore, mitigation measures are required. Under the Proposed Action, wetlands within the project area have the potential to be filled according to the percent impervious for the functional land use within which the wetland is located. Exact estimates are not known at this time; however, it would be anticipated that up to 25 acres of wetlands would be filled under the Proposed Action, resulting in permanent adverse impacts to wetlands. BMPs are described and recommended in the attached EA where applicable. A Wetland Mitigation Plan was prepared for the Proposed Action and identifies mitigation in the form of a credit purchase from an off-site mitigation bank at a 1-to-1 ratio. The compensatory mitigation would be negotiated with the US Army Corps of Engineers and could include mitigation banks outside Grand Forks County. Grand Forks County would take all necessary actions to remain in compliance with the *Clean Water Act*, and US Army Corps of Engineers and State of North Dakota wetland regulations. With strict adherence to 32 CFR §§ 989.22(c) and (d), 32 CFR § 989.14(j)(4), and all applicable permits and regulations, use of appropriate BMPs, and implementation of compensatory mitigation actions, permanent adverse impacts to wetlands resulting from the Proposed Action would be reduced to insignificant levels.

### **Public Review**

The DAF published an early public notice in the *Grand Forks Herald* on 25 and 29 November 2023 regarding the Proposed Action and its potential to affect wetland resources and/or waters of the United States. A notice of availability of the Draft EA and Draft FONSI was published on 10 and 13 April 2024 in the *Grand Forks Herald* to commence the 30-day public comment period for the Draft EA and Draft FONSI.

### **Conclusion**

***Finding of No Practicable Alternative.*** Pursuant to EO 11988, *Floodplain Management* (amended by EO 13690), and EO 11990, *Protection of Wetlands*, and considering all supporting information, the DAF finds that there is no practicable alternative to the Proposed Action being located in wetlands, as discussed in the attached EA. Under the Proposed Action, the filling of up to 25 acres of wetlands and up to approximately 7,130,000 ft<sup>2</sup> of impervious surfaces would result in adverse impacts to wetlands. However, long-term, beneficial impacts to BASH would occur by removing such wetlands. Anticipated impacts to wetlands would be managed through BMPs as discussed in the attached EA. Alternatives considered that would require less development were dismissed from analysis because the 2014 EA previously evaluated development thresholds that are still applicable. Development beyond these thresholds is required to meet future tenant demand and would support the DAF's strategic goal of optimizing the value of its existing real property assets. The development activities would promote the efficient and economical use of real property assets at GFAFB pursuant to the directives of EO 13327, *Federal Real Property Asset Management*. In seeking development of this property, GFAFB is also pursuing objectives outlined in the 14 February 2007, DAF memorandum, *Pursuing "Value-Based" Transactions Involving Air Force Real Property Assets*. This memorandum directs the DAF to optimize the value of real property assets using authorized tools such as the EUL program; therefore, no practicable alternatives to the removal of wetlands exist.

***Finding of No Significant Impact.*** After review of the attached EA prepared in accordance with the requirements of NEPA, CEQ regulations, and 32 CFR Part 989, and which is hereby incorporated by reference, I have determined that 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.

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TBD

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DATE