

**PROPOSED FINDING OF NO SIGNIFICANT IMPACT (FONSI)
AND FINDING OF NO PRACTICABLE ALTERNATIVE (FONPA)
F-22A AIRCRAFT PLUS-UP
DRAFT ENVIRONMENTAL ASSESSMENT
JOINT BASE PEARL HARBOR-HICKAM, HAWAII**

Pursuant to provisions of the National Environmental Policy Act (NEPA), 42 United States Code §§ 4321 to 4370h and Department of Defense (DoD) National Environmental Policy Act Implementing Procedures (July 2025), the National Guard Bureau prepared the attached Environmental Assessment (EA) to address the potential environmental consequences associated with integrating a total of seven Department of the Air Force (DAF) F-22A Raptors from Tyndall Air Force Base (AFB) into the current fleet of the Hawaii Air National Guard (HIANG) 199th Fighter Squadron (199 FS), Joint Base Pearl Harbor-Hickam (JBPHH), Hawaii.

Purpose and Need

The purpose of the Proposed Action is to integrate a total of seven DAF F-22A Raptors from Tyndall AFB into the current fleet of the HIANG 199 FS. This would include six Primary Aerospace Vehicle Authorized (PAA) and one Backup Aircraft Inventory (BAI). The Proposed Action would result in an increase in the total F-22A aircraft assigned to the 199 FS from 18 to 24 until permanent disposition of the aircraft is determined. The devastation caused by Hurricane Michael rendered Tyndall AFB incapable of hosting F-22A aircraft for the foreseeable future. Rather than reconstructing the F-22A facilities that were damaged by Hurricane Michael, the DAF decided that a more efficient way forward would be to consolidate the F-22A aircraft assigned to Tyndall AFB to the other F-22A operational squadrons to maintain operational readiness. The F-22A aircraft have been temporarily located at and operating from JBPHH since 2018.

Proposed Action (Alternative A)

Multiple alternatives to the Proposed Action that could be utilized to meet the purpose of and need for the Proposed Action were evaluated against the selection standards and dismissed from detailed consideration. Only Alternative A (the Proposed Action) would address the selection standards and meet the purpose and need. Alternative A would integrate seven total F-22A aircraft into the current fleet of the 199 FS, which would result in F-22A aircraft assigned to the 199 FS increasing from 18 PAA plus 2 BAI to 24 PAA plus 3 BAI. This integration would last until permanent disposition of the aircraft is determined. Alternative A includes elements affecting the base and military training Special Use Airspace (SUA). The elements affecting JBPHH include additional aircraft, support facilities and infrastructure, maintenance equipment, hazardous materials and hazardous waste, personnel, and sorties. The elements affecting the SUA include increased use of SUA and defensive countermeasures during training operations. The aircraft associated with Alternative A would be additive at JBPHH with additional programmed flying hours and would fly additional sorties.

An estimated 150 additional pilots, maintenance, and support personnel would be needed to support Alternative A. New construction and repair of some existing facilities would also be needed to support the additional aircraft and personnel. Alternative A would add an estimated 405 annual sorties at JBPHH, which includes those expected for training activities and aircraft leaving for or returning from deployment or depot-level maintenance. This would result in an increase of less than 1 percent in the number of total operations at JBPHH. The additional F-22A aircraft would use the same SUA currently utilized by the aircraft assigned to the 199 FS. The SUA includes offshore Warning Areas W-188C, W-189, W-190, W-192, W-193, and W-194 and Air Traffic Control Assigned Airspace (ATCAA) Mela South and Nalu.

The integration of the additional F-22A aircraft would require construction of new facilities and the repair of existing facilities (nine total projects) that would be located around the existing airfield and runway. Projects would include the construction of additional ramp space and repair of deteriorated ramp pavement for the installation of additional sunshades; the construction of maintenance space for munitions, egress, and aircraft support equipment; construction of additional munitions storage, a new Intel vault, a new F-22 maintenance deployment storage facility; the repair and renovation Squadron Operations; and the

conversion of the F-15 corrosion control facility to an F-22 paint facility. These projects are planned for Fiscal Year 2025 and beyond.

Alternative A would include the increased use of countermeasure chaff and flare and hazardous materials, as well as the generation of hazardous wastes and industrial wastewater. No substantial increase in the use of 20-millimeter ammunition is expected.

No Action Alternative

No action means that an action would not take place, and the resulting environmental effects from taking no action would be compared with the effects of allowing the proposed activity to go forward. No action means the F-22A aircraft from Tyndall AFB would not be integrated into the 199 FS. Under the No Action Alternative, the DAF would be required to identify an alternative unit for the F-22A aircraft. The 199 FS would stay at less than 24 PAA, resulting in continued inefficiencies driven by a smaller squadron size.

Summary of Findings

Potentially affected environmental resources were identified through communications with state and federal agencies and review of past environmental documentation. Specific environmental resources with the potential for environmental consequences include airspace management and use; noise; air quality; health and safety; land use; earth resources; water resources; biological resources; cultural resources; infrastructure, transportation, and utilities; hazardous materials and wastes, environmental restoration program, and toxic substances; socioeconomics; and the protection of children.

Under Alternative A, the annual number of F-22 sorties on JBPHH would increase by 14.7 percent and would not impact the operational capacity or necessitate modifications of the SUA around JBPHH. Potential impacts on the SUA around the airfield under Alternative A would be negligible. Likewise, proposed operations in the Warning Areas and ATCAAs would increase by an estimated 14.7 percent and have the capacity and dimensions necessary to support additional sorties; therefore, potential negligible impacts on SUA are anticipated for Alternative A. The increase in sorties at the installation and in the SUA, when added to reasonably foreseeable future projects, would result in a negligible effect.

Proposed sorties from the additional F-22A aircraft would potentially increase noise impacts; however, that increase would result in negligible impacts for Alternative A. Runway utilization, flight tracks, flight track utilization, and day/night flight distribution for proposed F-22A aircraft would be identical to existing F-22 operations. Alternative A noise contours are nearly identical to the existing conditions noise contours. The primary change in the noise contours under Alternative A is the slight expansion of the 75-A-weighted decibel day-night sound level contours west of the airfield. In addition, noise levels at representative Points of Interest would not increase. JBPHH-based aircraft do not dominate the noise environment of the Warning Areas or ATCAAs due to the large number of operations from aircraft based at other installations and the low number of JBPHH aircraft operations. Due to the low number of SUA operations under Alternative A, there are no significant impacts expected to the noise environments in any of the Warning Areas or ATCAAs. Alternative A, when added to reasonably foreseeable future projects on and off JBPHH would result in negligible impacts to the noise environment.

Under Alternative A, there would be new construction activities resulting in additional noise at JBPHH. Noise generated by construction operations would be short-term due to the temporary nature of construction projects. Due to noise from the nearby active airfield, noise from construction operations would be expected to contribute only negligible increases to the JBPHH noise environment.

Increased air emissions resulting from the sorties of the additional F-22A aircraft are not considered significant under Alternative A. In no instance would criteria pollutant emissions from aircraft operations or construction activities exceed the threshold that triggers Prevention of Significant Deterioration analysis or interfere with the region's ability to maintain compliance with National Ambient Air Quality Standards for attainment area pollutants. The SUA is not in regulatory control areas and is beyond state jurisdictional boundaries; moreover, criteria pollutants are below thresholds, and as such, pollutants would not be expected to impact air quality in any of the SUA. Alternative A, in addition to reasonably foreseeable future actions on and off JBPHH, may result in impacts on air quality due to ongoing and proposed construction

projects at JBPHH and off-base roadway work. These increases, however, would be short in duration, and the potential incremental impact on air quality would be negligible.

Safety zones around the airfield would not be expected to change. No significant impacts are expected to flight safety under the implementation of contractor flight safety rules and bird/wildlife-aircraft strike hazard (BASH) procedures. While activities associated with the proposed construction and repair projects have inherent risks, individuals contracted to perform construction and repair activities are responsible for adhering to Occupational Safety and Health Administration requirements that would greatly reduce hazards. Alternative A, in addition to reasonably foreseeable future actions on and off JBPHH, would follow applicable ground and flight safety procedures and policies. As such, no impacts on health and safety are expected.

The handling and storage of munitions to support the additional F-22A aircraft would be provided by trained and certified personnel following DAF safety guidance and technical orders. Planning for the new facilities either within the Munitions Storage Area or within quantity-distance arcs would be completed as outlined in Department of Defense and DAF regulations to provide the maximum protection possible to personnel and property, both on and off the installation, from the destructive consequences of potential accidents. No reasonably foreseeable future actions on or off JBPHH are expected; therefore, the implementation of Alternative A would not have an adverse effect.

No long-term changes to the existing land use are expected from implementation of Alternative A. The proposed new facilities would be constructed within Aircraft Operations or Industrial land use areas, in compatible land uses, and there would be no changes to land use on JBPHH. The HIANG, in coordination with the State of Hawaii, Department of Business, Economic Development and Tourism, will execute a consistency determination process to ensure Coastal Zone Management Program concurrence. It is anticipated that implementation of Alternative A would qualify for a Negative Determination due to the types and locations of proposed facilities and because no activities would occur within the shoreline setback area. The implementation of Alternative A, in addition to reasonably foreseeable future actions on and off JBPHH, would not change land use or land use compatibility or impact coastal resources.

Construction activities can be a major source of sedimentation in drainage systems, ground surfaces, or water bodies. To minimize potential impacts, Best Management Practices (BMPs) would be implemented during construction. Adherence to Department of Defense and DAF requirements and implementation of construction BMPs would minimize impacts to earth resources. No significant adverse impacts on earth resources would be expected to occur. Alternative A, in combination with reasonably foreseeable future actions on JBPHH, would not be expected to have an impact on earth resources.

The primary concerns associated with Alternative A include effects on water quality during construction and the temporary and permanent conversion of existing pervious ground to impervious surfaces. For proposed facility construction activities that would occur near identified wetlands, the HIANG would conduct jurisdictional wetland determinations and acquire a Section 404 of the Clean Water Act permit, if necessary, prior to filling of jurisdictional drainages. Activities at the locations proposed for new facilities may result in a minor, short-term increase in total suspended particulate matter (i.e., sedimentation) to nearby surface waters. Adherence to the requirements of the construction general permit and the Base Stormwater Management Plan, as well as the implementation of construction BMPs, would minimize impacts on water resources and potential impacts on nearby surface waters. In compliance with Energy Independence and Security Act Section 438, construction projects would offset new impervious surface areas with stormwater management options (including Low Impact Development) that retain stormwater on the installation thereby reducing runoff and preserving groundwater hydrologic processes. In addition, groundwater would not be impacted since construction activities would not be expected to reach the depth to groundwater. The implementation of Alternative A, along with reasonably foreseeable future actions on and off JBPHH, would not be expected to have an impact on water resources.

Some of the proposed construction within the HIANG area would occur within the 100-year flood hazard zone. Since such a large amount of the HIANG lease area is located within flood hazard zones, there are no practicable alternatives to construct new facilities. It would not be practicable to relocate the entire HIANG installation from its current site. Further, these projects within the 100-year flood hazard zone are specifically located adjacent to existing ramps and associated facilities and the relocation of these projects

to other locations outside of flood hazard areas would not be possible without losing substantial functionality of the facilities. Projects located within flood zones and tsunami inundation zones would incorporate flood protection measures into their design, and as such, no significant impacts from the construction of new facilities or the repair of existing facilities within flood hazard areas is expected.

Changes in the noise environment from increased operations at JBPHH would have a potential negligible, short- and long-term effect on wildlife. Risk reduction implementation measures associated with the BASH program would continue to reduce BASH, potentially resulting in a minor impact on birds and other wildlife. Five federally listed bird species have been previously observed on JBPHH, Hawaiian monk seals occur on JBPHH beaches, and green turtles are present in nearshore waters; however, no impacts are anticipated on any listed species from aircraft operations at the airfield as noise and aircraft movement would not change substantially compared to baseline conditions. Noise from the additional F-22A aircraft would not increase substantially (including from sonic booms) in the SUA and would therefore have no effect on the listed marine mammal species and sea turtles. The use of chaff and flares would have no direct impact on wildlife; however, small plastic caps and pistons associated with the use of defensive countermeasures could make it to the surface of the Pacific Ocean. These small residual plastic components could be consumed by birds, marine mammals, fish, and sea turtles. As such, the use of defensive countermeasures during training activities in the SUA may affect but is not likely to adversely affect band-rumped storm-petrel, Newell's Townsend's shearwater, short-tailed albatross, federally listed marine mammals, federally listed sea turtles, giant manta ray, oceanic whitetip shark, and scalloped hammerhead shark. While designated critical habitat for monk seals and false killer whales is located beneath a portion of the SUA, operations by the additional F-22s would not alter essential features of designated critical habitat. A may affect but not likely to adversely affect determination for federally listed species was provided to the United States (US) Fish and Wildlife Service, Hawaii Field Office, and National Marine Fisheries Service for concurrence. Responses are pending from both agencies. Alternative A, in addition to reasonably foreseeable future actions on and off JBPHH, would potentially result in a less than significant impact on biological resources. When added to reasonably foreseeable future actions, Alternative A may result in an increased risk of aircraft bird and other wildlife strikes, although compliance with the JBPHH BASH prevention program would reduce this risk. Impacts would not be expected on marine mammals, sea turtles, threatened and endangered species, or Essential Fish Habitat from the implementation of Alternative A in addition to proposed Navy training activities.

The proposed building construction and repair project sites mostly support nonnative plant and wildlife species. Recent surveys did not document federally or state listed endangered or threatened plant or wildlife species. In addition, there is no designated critical habitat on or immediately adjacent to JBPHH. As such, the proposed construction and repair projects would not impact federally or state listed species or designated critical habitat. Moreover, Alternative A would have no in-water activities and as such would not impact listed species that use reefs near Oahu or beneath the SUA. No effects on terrestrial federal or state listed plant species, reptiles, amphibians, fish, or invertebrates are anticipated from Alternative A in combination with other foreseeable future actions since no direct or indirect impacts on these species from Alternative A is expected.

Ground-disturbing activities would be limited to the seven construction sites that are located in heavily developed areas of the base, and these areas are identified as having low potential for previously undocumented archaeological deposits. No traditional cultural properties or sacred sites have been formally identified at JBPHH. One construction project and one repair and reconfiguration project are proposed adjacent to Selfridge Battery (Building 3440). This resource is one of five batteries dating to the early twentieth century comprising the Artillery District of Honolulu and classified as a Category I property of major importance for two time periods. Alterations to the battery is not included under Alternative A nor would be impacted by repair and construction activities, and because the battery's current location is in a developed portion of the base, geographically separated from the other batteries, it conveys its integrity in form and function, not in setting. Alternative A would not impact archaeological resources, cultural properties, or historic properties.

The short-term construction activities and the increase in assigned personnel would have both short-term and long-term impacts on infrastructure, transportation, and utilities. During construction, equipment and contractors commuting to the work sites would cause increased traffic at JBPHH gates during peak hours,

yet these would end once construction is completed. In addition, the increase in pilots, maintenance, and other support personnel and their dependents would result in a small increase in gate traffic. The generation of solid wastes would increase during construction but would cease with construction. The increase in personnel, however, would mean a negligible increased solid waste generation. The utility systems at JBPHH have the capacity for the proposed facilities and the additional personnel. Minor long-term impacts on transportation at JBPHH may occur from the implementation of Alternative A in addition to reasonably foreseeable future actions due to the increase in personnel. No impacts on utilities and solid waste are expected.

Hazardous wastes generated as a result of the additional F-22A aircraft would be properly handled, stored, and disposed of following the NAVFAC Hawaii Hazardous Waste Management Plan; therefore, no impacts from managing hazardous waste are expected. No impacts are expected from asbestos-containing materials and lead-based paint from interior repairs and renovations of proposed facilities with implementation of requirements described in the NAVFAC Hawaii Asbestos Management and Operations Plan. Lighting fixtures containing polychlorinated biphenyls would be disposed in accordance with federal, state, and local laws, which would potentially result in a long-term, minor, beneficial impact. There is a low potential for radon to pose a health hazard at JBPHH; however, no impacts from radon are anticipated. There are no active Installation Restoration Program sites that would be impacted by the proposed facility construction and improvements at JBPHH under Alternative A. No significant impacts on the management of hazardous materials and wastes, contaminated sites, and toxic substances from the implementation of Alternative A when added to reasonably foreseeable future actions would occur. While the storage and quantity of jet fuels, solvents, oil, and other hazardous materials needed to support Alternative A operations, in addition to foreseeable future projects, would likely increase; this potential increase is expected to be negligible.

Additional materials and labor for the facility construction and renovation would have a minor short-term impact on the socioeconomic condition on the region. The 150 additional Guard and civilian personnel and associated family members and dependents would represent a small increase in the total persons assigned to and working at JBPHH and in Honolulu County where there are over 900,000 residents; therefore, no adverse impacts on income and employment would occur under Alternative A. Alternative A along with reasonably foreseeable actions on and off JBPHH would potentially result in the long-term, minor increase in annual expenditures in the local economy.

The increase in the number of personnel at JBPHH supporting the additional F-22A aircraft and training operations would not result in a disproportionate impact on minorities, low-income populations, and protection of children, because there would be adequate housing, community resources, and community services in the Honolulu region to support the small increase in personnel. No disproportionate impacts on minority populations or low-income communities surrounding JBPHH are expected because changes in the noise environment near the JBPHH airfield as a result of the additional sorties would be minimal. Alternative A, as well as reasonably foreseeable future actions on and off JBPHH, would not be expected to have a disproportionate impact on minority and low-income populations or children.

Mitigation

The EA analysis concluded that Alternative A would not result in significant environmental impacts; therefore, no mitigation measures are required.

Best Management Practices are described in the EA where applicable.

Conclusion

Finding of No Practicable Alternative. Pursuant to Executive Order (EO) 11988, *Floodplain Management*, and EO 11990, *Protection of Wetlands*, and taking the above information into consideration, I find that there is no practicable alternative to this action and that the action includes all practicable measures to minimize harm to the existing environment. The HIANG Environmental Management Office provided a 30-day public review period and sent notices to appropriate government organizations including the State of Hawaii, Department of Business, Economic Development and Tourism and the Honolulu District of the United States Army Corps of Engineers.

Finding of No Significant Impact. After review of the EA prepared in accordance with the requirements of NEPA and the DoD NEPA Implementing Procedures, and which is hereby incorporated by reference, I have determined that the proposed activities for the integration of seven F-22A aircraft to the 199 FS at JBPHH, Hawaii, would not have a significant impact on the quality of the human or natural environment. Accordingly, an Environmental Impact Statement will not be prepared. This decision has been made after considering all submitted information, including a review of agency comments submitted during the 30-day public comment period, and considering a full range of practical alternatives that meet project requirements and are within the legal authority of the National Guard Bureau.

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Date