FEDERAL AVIATION ADMINISTRATION

ADOPTION OF THE ENVIRONMENTAL ASSESSMENT
AND
FINDING OF NO SIGNIFICANT IMPACT and RECORD OF DECISION

FOR

Wisconsin Air National Guard Volk Field Combat Readiness Training Center
Redesign and Expansion of Military Operations Areas Complex and
Special Activity Airspace

Introduction
This document serves as the Federal Aviation Administration's (FAA) adoption of the Wisconsin Air National Guard (WIANG), Volk Field Combat Readiness Training Center (CRTC), Volk Field, Camp Douglas, Wisconsin, Final Environmental Assessment (EA) Volk Field Special Activity Airspace Modification and Establishment, Finding of No Significant Impact (FONSI), and Record of Decision (ROD); and concurs with the recent request from the WIANG to defer further processing of R-6904C, which, while is part of the proposed action and analyzed in the EA, is therefore not included in this decision, but may receive a decision at a later date.

The EA analyzed the potential environmental impacts associated with the modification of the existing Volk Field Special Activity Airspace (SAA) by raising the floor altitude of some areas, reconfiguring the airspace borders, and expanding the external airspace boundaries. The existing Air Traffic Controlled Assigned Airspace (ATCAA) would be modified through establishing ATCAAs over the top of the proposed Military Operations Areas (MOAs) and establishing a new ATCAA to the east of the Volk East MOA. The EA also analyzed the establishment of the new Restricted Area R-6904-C.

The FONSI provided the environmental impact determination and resulting decisions. Pursuant to section 102(C) of the National Environmental Policy Act (NEPA) of 1969, and the Council on Environmental Quality (CEQ) regulations (40 CFR parts 1500-1508), the FAA announces its decision to adopt the WIANG EA and FONSI for the purpose of the Volk Field Special Activity Airspace Modification and Establishment, Camp Douglas, Wisconsin.

Background
On August 12, 2013 the FAA responded to a National Guard Bureau (NGB) request that the FAA participate as a cooperating agency in the EA for proposed airspace establishment and modifications of the Volk SAA Complex, Wisconsin. In its September 30, 2013 response, the FAA accepted cooperating agency status in accordance with the CEQ regulations Sections 1501.6 and 1508.5 and the October 4, 2005 Memorandum Of Understanding between the FAA and Department of Defense Concerning SUA Environmental Actions.

As the lead agency, the WIANG published the Final EA in accordance with the National Environmental Policy Act (NEPA) in April 2016. The Final EA concluded with a Finding of No Significant Impact (FONSI), which was signed by the WIANG on April 27, 2016.
A number of modifications were made to the Final EA based upon the input received during the public review and comment period for the Draft EA; these modifications were made to provide clarification of the proposed action and impact assessment. No modifications made to the Final EA in response to comments substantially changed the Proposed Action, and the conclusions relevant to environmental concerns remain consistent with those presented in the Draft EA.

As a cooperating agency, the FAA provided input to the WIANG during the environmental process. In accordance with FAA Order 1050.1 E "Environmental Impacts: Policies and Procedures for Considering Environmental Impacts" Paragraph 404d, the FAA has independently evaluated the information contained in the proposal and takes full responsibility for the scope and content that address FAA actions. The FAA evaluation also included all impact categories required by NEPA, and has found those to be in accordance with NEPA and its implementing regulations 40 CFR Part 1500-1508 and FAA Order 1050.1E1.

**Proposed Federal Action**
The proposed action, as set forth and analyzed in the Final EA, would modify and expand the existing Volk Field SAA with the following seven (7) components:

1) **Establish the Volk Falls MOA and Black River ATCAA**: The existing Falls 1 MOA and approximately 410 square miles of the Falls 2 MOA would be combined to establish the Volk Falls MOA and would remain from 500 feet AGL to 17,999 feet MSL. Additionally, the southern-most border of the existing Falls 1 MOA would be modified resulting in a linear boundary, which would result in WIANG giving up a 33 square mile segment of airspace and expanding airspace into a new 29 square mile area below the existing MOA. The Black River ATCAA would be established to cover a majority of the proposed Volk Falls MOA with the exception of small areas on the northern and western borders to accommodate existing commercial air traffic routes and holding points. Black River ATCAA would extend from 18,000 feet MSL to 21,000 MSL with the ability to schedule the proposed ATCAA to 50,000 feet MSL to accommodate Large Force Exercises (LFEs) and Defense Counter Air (DCA) training requirements (see Final EA Section 2.2).

2) **Modify the Volk West MOA**: The existing boundaries of the Volk West MOA would be expanded to the north to include the eastern 285 square miles of the existing Falls 2 MOA, and the existing boundaries of the Volk West MOA would be extended to the south to absorb the northern-most 300 square miles of the existing Volk South MOA. The Volk West MOA would extend from 500 feet AGL to 17,999 feet MSL, with the WIANG relinquishing airspace below 500 feet AGL (see Final EA Section 2.3).

3) **Modify the Volk South MOA**: The northern-most extent of the existing Volk South MOA would be included in the Volk West MOA, causing the Volk South MOA northern border to be liner and moved southward. The southwestern border of the Volk South MOA would be expanded by 85 square miles. The Volk South MOA would extend from 500 feet AGL to 17,999 feet MSL; it would exclude Bloyer Field and the Mauston-New Lisbon Airport with a horizontal three (3) NM radius boundary and a 1,500 feet AGL vertical boundary and the (deferred) R-6904C (see Final EA Section 2.4).

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1 On July 16, 2015, FAA Order 1050.1F became effective, updating and replacing Order 1050.1E. Because the EA was substantially drafted while Order 1050.1E was in effect, it would not be practicable to fully revise the document to follow the procedural structure of Order 1050.1F. See Order 1050.1F para. 1-9.
4) Modify and Expand the Volk West ATCAA: The existing Volk West ATCAA would expand and consolidate two existing ATCAAs – the Volk West ATCCA that extends from FL 18,000 feet MSL to 23,000 feet MSL and the Volk South ATCAA that extends from 18,000 feet MSL to 28,000 feet MSL. It would cover the footprint of the proposed Volk South MOA and the majority of the proposed Volk West MOA, extend from 18,000 feet MSL to 28,000 MSL, with the ability to periodically schedule a ceiling of 50,000 MSL to accommodate LFEs and DCA training events.

5) Modify the Volk East MOA and Volk East ATCAA: The Volk East MOA would be extended to the north and east, resulting in a total 1, 220 square mile increase in the total airspace area. The expansion of the Volk East MOA would incorporate the area to the north of the existing Volk East MOA that has previously been scheduled as the Lightning Temporary MOA. The Volk East ATCAA would be expanded to match the footprint of the proposed Volk East MOA with no change in vertical airspace areas. However, Volk Field CRTC would have the ability to periodically schedule a ceiling of 50,000 feet MSL to accommodate LFEs and DCA training events (see Final EA Section 2.5).

6) Establish the Oshkosh and Sheboygan East and West ATCAAs: The WIANG A, B and C ATCAA would be rescinded and the Oshkosh and Sheboygan East and West ATCAAs would be established. The vertical limits of the Oshkosh ATCAA would extend from 18,000 feet MSL to 28,000 feet MSL and the Sheboygan East and West ATCAAs would extend from 18,000 feet MSL to 24,000 feet MSL (see Final EA Section 2.6).

7) Establish Restricted Area 6904C: R-6904C would be established above the Hardwood Aerial Gunner Range encompassing a 350 square mile area, larger than both R-6904A and R-6904B. Non-eye safe laser use in R-6904C would be air-to-ground only and would only target the existing Hardwood Range. The vertical limits of R-6904C would be 3,000 feet MSL to 28,000 MSL.

On April 27, 2016 WIANG sent FAA a request to defer further processing of R-6904C, component (7) of the Proposed Action as described above. (Attachment 1 to this FONSI-ROD). Therefore, this FONSI-ROD does not address R-6904C; rather, R-6904 may be the subject of a separate decision-making document following the completion of the FAA’s required rulemaking process. Nevertheless, the potential environmental impacts of the proposed R6904C have been analyzed in the Final EA. If, through the rulemaking process, substantive public comments were to be received that would have the potential to alter the analysis and its outcome, the FAA would revisit the Final EA with respect to R-6904C to the extent necessary and appropriate under NEPA. This could include the preparation of a Written Re-evaluation or Supplemental EA.

Purpose and Need
The purpose of the proposed action is to provide an integrated, properly configured, realistic military training airspace with adequate dimension and size to support advanced tactical fighter technologies and tactics. The proposed action would support and more adequately facilitate air-to-air and air-to-ground training as well as LFEs in accordance with Air Force Instruction and Air Force Tactics, Techniques and Procedures (AFTTP) training requirements. The proposed modification and expansion of the Volk Field SAA would more adequately support AIM-120 Advanced Medium-Range Air-to-Air Missile tactics, Low Altitude Training tactics, and advanced targeting Pod stand-off employment in support of Air National Guard Mission Directive 10.01 to establish a training area that approximates a deployed, combat-oriented operating base.
The need for the proposed action is driven by multiple shortfalls in the existing Volk Field SAA complex that were identified by FAA and ANG in the June 2008 Volk Airspace Complex Joint FAA/ANG Special Use Airspace Review. Implementation of the proposed action would address these shortfalls.

The Proposed Action would not require any ground-based improvements or construction activities or the employment of any new personnel.

**Alternatives**

In addition to the Proposed Action (Preferred Alternative) and the No-Action alternatives, three additional alternatives were analyzed in the EA, each of which includes pursuing a subset of the airspace modifications contained in the Proposed Action. Implementation of any of the three additional alternatives would achieve some but not all of the purpose and need requirements for the project proposal, and are described as follows.

Alternative 1: Eliminate Oshkosh and Sheboygan East and West ATCAAs from Proposed Action.
Under this alternative, all proposed modifications to and expansions of the Volk Field SAA described for the Proposed Action would be implemented with the exception of establishing the Oshkosh and Sheboygan East and West ATCAAs. The implementation of this alternative would not address aircraft marshalling limitations that arise during LFEs and specific unit phase training events, and would necessitate Volk Field CRTC airspace schedulers continuing to perform inter- and intra-facility coordination to establish temporary ATCAAs needed for operations. For this alternative, the WIANG A, B, and C ATCAAs would be retained as the location of the temporary ATCAAs, and the WIANG A, B and C ATCAAs would require they be redesigned to align with Volk East ATCAA.

Alternative 2: Eliminate Restricted Area 6904C from Proposed Action. Under this alternative, all proposed modifications to and expansions of the Volk Field SAA described for the Proposed Action would be implemented with the exception of R-6904C development. This alternative would not address limitations to stand-off precision-guided munitions employment and target coordinate generation training using long-distance non-eye safe combat lasers. Accordingly, pilots would be able to engage in these types of training exercises at shorter distances only that do not meet AFTTP requirements and do not approximate realistic mission-oriented scenarios.

Alternative 3: Increase Existing Volk West ATCAA Ceiling. Under this alternative, none of the proposed modifications to and expansions of the Volk Field SAA described for the Proposed Action would be implemented. Instead, the ceiling of the existing Volk West ATCAA would be raised from 23,000 feet MSL to 28,000 MSL. This would reduce the number of airspace shelves in the complex and eliminate a step-down shelf mid-way through the Volk Field SAA, thereby modestly increasing air training capabilities. However, implementation of this alternative would not address other overarching limitations of the existing airspace, including the complex airspace boundaries, bottleneck conditions, problematic airspace shelves and inability to support long-range laser operations at the Hardwood Aerial Gunnery Range.

No-Action Alternative: Selection of the No-Action alternative would result in no change to the current configuration of the Volk Field SAA, and local and deployed units training at the Volk Field CRTC
would continue to lose adequate training opportunities while preparing to deploy in support of Air Expeditionary Force (AEF) responsibilities. The current airspace would restrict current generation aircraft and tactics and would limit support for future aircraft, tactics, and techniques. Volk Field CRTC would not be able to fulfill directives to remain an effective advanced combat air forces training location.

**Environmental Impacts**
The following section contains the results of evaluation regarding the potential environmental impacts associated with the airspace modification and expansion.

**Noise:** Implementation of the Proposed Action would have no significant effect on noise. Only the Volk South MOA would experience a noise increase with implementation of the Proposed Action. However, the increase would be minor and not be significant or reportable in accordance with FAA Order 1050.1E.

**Land Use and Visual Resources:** None of the areas beneath the affected or proposed airspaces would experience noise levels greater than or equal to the 65 DNL threshold. The Necedah National Wildlife Refuge (NWR) is the only avoidance area identified within the Volk Field CRTC Standard Operating Procedures (SOPs). Noise levels in the Necedah NWR under the Proposed Action would be approximately 49.4 DNL, and would therefore continue to be characteristic of a quiet environment. Additionally, under the Proposed Action Volk Field CRTC would continue to maintain a hotline for noise-related complaints associated with military aircraft operations.

**Biological Resources:** The Proposed Action would not result in any construction or ground disturbance; therefore, the potential effects of the Proposed Action on biological communities would be limited to noise and bird strikes. The expansion of the Volk Field SAA would result in negligible increases in bird strike risks. Additionally, the Proposed Action would result in very minor changes to the current noise environment. Consequently, there would be no effect on federally protected species or federal designated critical habitat areas known to occur within the area of effect of the project area. Therefore, implementation of the Proposed Action would not have significant impacts on biological resources in the Volk Field SAA area of effect.

**Air Quality:** The Proposed Action would have no significant effect on air quality. While it would affect multiple counties in central and east-central Wisconsin because of the redistribution of aircraft operations, all counties within the region of influence (ROI) are in attainment for all criteria pollutants. Additionally, the majority of the proposed aircraft operations would occur at sufficient altitudes such that emissions would not affect ground-level concentrations of pollutants, i.e., above the mixing level.

**Climate Change:** Although there are no federal standards for aviation-related Green House Gas (GHG) emissions, it is well-established that GHG emissions can affect climate. The CEQ has indicated that climate should be considered in NEPA analyses. As noted by CEQ, however, "it is not currently useful for the NEPA analysis to attempt to link specific climatological changes, or the environmental impacts thereof, to the particular project or emissions, as such direct linkage is difficult to isolate and to..."

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Given that the total emissions associated with the Proposed Action would be the same, based on flight hours and fleet mix as the existing aircraft emissions for all the criteria pollutants, it is reasonably foreseeable that the carbon dioxide (CO₂) equivalent emissions would also not significantly change with the implementation of the Proposed Action. Therefore none of the alternatives considered in this EA would result in a net change with respect to Climate Change.

**Cultural Resources:** Under the Proposed Action, the floor of the proposed Volk Falls, Volk West, and Volk South MOAs would be established at 500 feet AGL. Aircraft operations at this altitude would not have the potential to cause structural damage to historical structures located beneath this airspace complex, which can occur with noise levels of approximately 130 dB. Visual effects, i.e., the presence of military aircraft, on these resources would be negligible, because the aircraft would only be visible from any given resource for a few minutes per flying day. Further, no impacts to Native American sacred or tradition site were identified or would be expected. Therefore, implementation of the Proposed Action would have less than significant impacts on cultural resources with the Volk Field SAA area of effect.

**Socioeconomics, Environmental Justice, and Children’s Health and Safety:** Under the Proposed Action, there would be no long-term changes in economic activity associated with the Volk Field CRTC, as no additional personnel would be added at the training center. Additionally, the Proposed Action would have negligible impacts on cities and communities within the area of effect. The majority of the existing Volk Field SAA and the proposed minor expansion areas would not cover areas of significant population or economic activity that are not already covered by the existing airspace complex. Ground-based economic activity, including employment, would not be impacted by any element of the expansion or of operations with the SAA, noise levels would remain well below the recommended sound level thresholds established to protect public health and welfare, including annoyance, in areas where quiet is a recognized resource. Therefore, implementation of the Proposed Action would have less than significant impacts on socioeconomics, environmental justice, and children’s health and safety issues beneath the proposed Volk Field SAA and within the area of effect.

**Department of Transportation Act, Section 4(f):** Section 4(f) provides that the Secretary of Transportation will not approve a project that requires the use of publicly owned land (e.g., parks, recreation areas and refuges). Designation of airspace for military flight operations, however, is exempt from Section 4(f).

**Cumulative Impacts:** The area underlying the proposed Volk SAA defined the geographic extent for the cumulative effects analysis. Analysis of the Proposed Action, as well as of the three (3) Alternative Actions and the No Action Alternative, when considered cumulatively with past, present and future actions, would not result in adverse and/or significant impacts to noise, land use and visual resources, biological resources, cultural resources, air quality, climate change or socioeconomics, environmental justice and protection of children.

The cumulative impact of this proposed action on the global climate when added to other past, and reasonable foreseeable future actions is not currently predictable using scientific methods. However,

aviation has been calculated to contribute approximately 3 percent of global CO₂ emissions; this contribution may grow to 5 percent by 2050. Actions are underway within the U.S. and by other nations to reduce aviation's contribution through such measures as new aircraft technologies to reduce emissions and improve fuel efficiency, renewable alternative fuels with lower carbon footprints, more efficient air traffic management, market-based measures and environmental regulations including an aircraft CO₂ standard. The U.S. has ambitious goals to achieve carbon-neutral growth for aviation by 2020 compared to a 2005 baseline, and to gain absolute reductions in GHG emissions by 2050. At present there are no calculations of the extent to which measures individually or cumulatively may affect aviation's CO₂ emissions. Moreover, there are large uncertainties regarding aviation's impact on climate. The FAA, with support from the U.S. Global Change Research Program and its participating federal agencies (e.g., NASA, NOAA, EPA, and DOE), has developed the Aviation Climate Change Research Initiative (ACCRI) in an effort to advance scientific understanding of regional and global climate impacts of aircraft emissions, with quantified uncertainties for current and projected aviation scenarios under changing atmospheric conditions.

Based on independent review of the airspace proposal, the FAA has determined there would be no significant cumulative impacts as a result of the establishment and modification of the Volk Field SAA.

The following NEPA impact categories were assessed and in accordance with CEQ regulations, did not warrant further analysis in the EA: Coastal Resources, Construction Impacts, Farmlands, Floodplains, Light Emissions, Hazardous Materials, Hazardous Waste and Solid Waste, Natural Resources and Energy Supply, Water Quality, Wetlands, Wild and Scenic Rivers.

Public Involvement

Notices of Availability (NOA) for public review of the draft EA and draft FONSI were published in seven (7) local newspapers on January 15, 2016. The draft EA and FONSI were available for public review during the 45-day public review period at nine (9) public library locations. The 45-day public and agency comment/review period began on January 15, 2016 and ended on February 29, 2016. Public and agency comments received during the 45-day comment period were incorporated into Appendix B and into the Final EA, where appropriate.

Compliance with the National Environmental Policy Act

In accordance with the requirements set forth in the President’s Council on Environmental Quality (CEQ) regulations (40 CFR Sections 1500-1508), which implement the procedural provisions of the National Environmental Policy Act (NEPA) of 1969 (42 USC 4321), the FAA has made the following determination based on appropriate information and analysis set forth in the Air National Guard Final EA. The FAA has given this proposal the independent and objective evaluation required by the CEQ (40 CFT 1506.5). As described in the Final EA, the proposed action and its alternatives were studied extensively to determine the potential impacts and appropriate mitigation measures. The FAA provided input, advice, and expert opinion throughout the planning and technical analysis, along with an administrative review of the project. The record shows that the FAA has fulfilled its responsibilities in connection with the environmental evaluation of this project, from its inception, and has maintained its objectivity in accordance with FAA Order 1050.1E, paragraph 404.d.

After evaluation of the potentially reasonable and available alternatives, the Proposed Action is found to best achieve the WIANG’s training goals and objectives. No feasible and prudent alternative to the proposed change in airspace has been identified that would accomplish the purposes and needs of aircraft training activities. No significant environmental impacts have been identified that would occur as a result of implementing the Federal Action. The preparation of an Environmental Impact Statement is not required.

**Compliance with the Memorandum of Understanding (MOU) between the FAA and Department of Defense (DOD)**

In accordance with the guidelines described in the MOU between the FAA and DOD concerning Special Use Airspace environmental actions, dated October 4, 2005, the FAA assumed the responsibility of being a cooperating agency and has made the following determination:

After independent review, the FAA determined that the environmental documents prepared by the lead agency met the standards for adequacy under NEPA.

The Final EA was jointly prepared, and has resulted in combined decisions. The lead agency was the Wisconsin Air National Guard Volk Field Combat Readiness Training Center, Volk Field, Camp Douglas, Wisconsin. The FAA was a cooperating agency. Each agency’s decision has been made pursuant to its individual responsibilities and authorities, and each agency shall be responsible for implementation of that portion of the proposed action under its authority.

**Adoption**

In accordance with FAA Order 1050.1E, paragraph 404d, the FAA has conducted an independent evaluation and prepared this Record of Decision for the Proposed Volk Field SAA expansion and modification. The FAA has determined that the Final EA adequately assesses and discloses the environmental impacts of the proposed action.

The FAA concurs with the April 27, 2016 request from the National Guard Bureau (attached) to defer further processing of Restricted Area R-6904C until the Volk CRTC responds to the questionnaire from FAA for more information about the restricted area considerations. Therefore, no action will be taken to implement R-6904C until that portion of the Proposed Action is satisfactorily completed in accordance with FAA Order 7400.2, Procedures for Handling Airspace Matters. Should there be substantial changes to the proposed action that are relevant to environmental concerns, or if there are new circumstances or information relevant to environmental concerns that have bearing on the proposed action or its impacts, FAA may determine that a supplement to the EA may be required.

Based on the FAA's independent evaluation, the Final EA is sufficient for adoption by the FAA and is hereby adopted. The FAA takes full responsibility for the scope and content that addresses FAA actions associated with the expansion and modification of the Volk Field SAA.

**Finding**

The FAA has determined that no significant impacts would occur as a result of the Federal Action and therefore that preparation of an Environmental Impact Statement is not warranted and a Finding of No Significant Impact in accordance with 40 CFR Part 1501.4 (e) is appropriate.
Statement
After careful and thorough consideration of the facts contained herein, the undersigned finds that the proposed Federal action is consistent with existing national environmental policies and objectives as set forth in Section 101(a) of the NEPA, as amended, and that it will not significantly affect the quality of the human environment or otherwise include any condition requiring consultation pursuant to Section 102(2)(C) of the NEPA.

Order and Right of Appeal
This decision to approve the redesign and expansion of Military Operations Areas Complex and Special Activity Airspace for the Wisconsin Air National Guard Volk Field Combat Readiness Training Center at Volk Field in Camp Douglas, Wisconsin constitutes an order of the FAA Administrator pursuant to 49 U.S.C. § 40103. It is subject to review by the Courts of Appeal of the United States in accordance with 49 U.S.C. §46110. Any party seeking to stay the implementation of this decision must file an application with the FAA prior to seeking judicial relief as provided by Rule 18(a) of the Federal Rules of Appellate Procedure.

Leslie Swann, Manager
Airspace Policy Group
Mission Support Service
Air Traffic Organization
Federal Aviation Administration

Attachment: NGB April 27, 2016 Memorandum to FAA Re: R-6904C Decision Deferment
ATTACHMENT 1

MEMORANDUM FOR AFREP, FAA Central Services Area FROM: NGB/A236

27 April 2016

SUBJECT: Submittal of Volk Airspace Modification Final Environmental Assessment (EA) and Finding of No Significant Impact (FONSI)

This memorandum serves as the transmittal letter for the Volk Combat Readiness Training Center (CRTC) airspace modification Final EA and signed FONSI. This Final EA provides assessment of our proposal to modify the Volk CRTC airspace complex and create new restricted area airspace. Also included is our conclusion and finding of no significant impact with our preferred action or other alternatives.

On 8 February, 2016, HQ FAA submitted a request for additional information specifically regarding our request to create restricted area airspace. Our preferred action remains unchanged – modify existing Military Operating Areas (MOAs) and create new Restricted Area (RA) airspace. The EA has been updated to address the issues raised. But if you have any additional questions or issues you would like to discuss as the FAA performs its own independent review, please don’t hesitate to notify this office so that we can provide the FAA with anything that is needed.

At this time, please information the FAA Central Services Area to continue processing our MOA aeronautical proposal per FAA JO 7400.2. However, please hold off on any further movement of the RA aeronautical proposal until Volk CRTC provides written responses to the HQ FAA memorandum.

Please contact Mr. Jamie Flanders, jamie.a.flanders.civ@mail.mil, comm 240-612-9253 if you have any additional questions or concerns.

CHRISTOPHER D. SWADENER, GS-15, DAF
Associate Director, Air Operations