

# **Finding of No Significant Impact**

## **Environmental Assessment for Construction Projects at Dobbins Air Reserve Base, Georgia**

Pursuant to the Council on Environmental Quality's (CEQ's) Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act of 1969 (NEPA), *Code of Federal Regulations* Title 40, Parts 1500 through 1508, and 42 *United States Code* Sections 4321 *et seq.*, the Air Force Reserve Command performed an environmental assessment (EA) to evaluate the impacts resulting from the construction of new facilities at Dobbins Air Reserve Base (ARB) in Georgia. The EA is incorporated by reference into this Finding of No Significant Impact (FONSI).

### **Purpose and Need**

The purpose of the Proposed Action is to provide new permanent facilities that meet installation architectural standards, local building codes, and Department of Defense (DoD) Unified Facilities Criteria (UFC), which provide technical criteria and guidance for standardized planning, design, construction, and operation and maintenance of DoD's real property facilities. The new facilities are needed to support Dobbins ARB's current and future mission needs. The Proposed Action would provide modern facilities and training areas that are properly sized and designed for the intended use, collocate similar staff functions, and ensure land use consistent with installation planning guidelines.

### **Description of the Proposed Action**

The Proposed Action includes the construction of a new Headquarters building and training facilities for the 622nd Civil Engineering Group (CEG), a new Logistics Readiness Squadron (LRS) warehouse for the 94th Airlift Wing, and a new Fitness Center. The proposed facilities would comply with base architectural compatibility standards and applicable DoD, U.S. Air Force (USAF), and installation design standards, including antiterrorism/force protection, Americans with Disabilities Act, and fire code requirements, per the UFC. The new facilities would include sustainable principles, such as life-cycle cost-effective practices, which would be integrated into the design, development, and construction of the project in accordance with U.S. Energy Policy Act 2005 and other applicable laws and Executive Orders.

### **Alternative 1 – New Construction (Preferred Alternative)**

Alternative 1, which is Dobbins ARB's preferred alternative, identifies locations for constructing the new buildings and training facilities included in the Proposed Action.

#### *622 CEG Headquarters Building and Training Center*

The Headquarters building for 622 CEG would be constructed in the Joint Use District on an approximately 2-acre wooded parcel adjacent to the existing Expeditionary Combat Support – Training & Certification Center (ECS-TCC) classroom campus on Ridenour Drive. This location would collocate administrative and classroom functions for the 622 CEG, creating a walkable campus and eliminating unnecessary vehicle traffic travel between administrative and training buildings.

The approximately 49-acre Dead Runway site is the proposed location for the 622 CEG Training Center, which includes a vehicle and equipment storage building and training facility upgrades. The storage building would be constructed in an undeveloped area adjacent to the southeast end of the Dead Runway. The building's proximity to the location of the engineer training would make access to vehicles and equipment convenient and efficient. Training facility upgrades would support mission training activities, including earth moving, rapid airfield damage recovery, crane operation, mine detection, airfield lighting, mobile aircraft arrest systems, and minimum airfield operating surface repairs.

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*LRS Warehouse*

The new LRS warehouse would be constructed in the Mission Support District and would occupy approximately 4 acres of currently forested and grassy land adjacent to the existing Base Exchange (Building 530), Vehicle Maintenance Facility (Building 516), and Civil Engineering (Building 501). This area is well-developed and has access to Atlantic Avenue, a main road on Dobbins ARB.

*Fitness Center*

The new Fitness Center would be located on an approximately 6-acre, mostly wooded site in the Joint Use District, adjacent to the existing running track. Constructing the Fitness Center in this location would collocate fitness activities in one centralized area.

**No Action Alternative**

The No Action Alternative represents baseline conditions, which are used for comparison to future conditions that would exist under the Proposed Action. Under the No Action Alternative, the Proposed Action under Alternative 1 would not be implemented. The construction of new facilities would not occur, which does not meet current USAF requirements. Existing operations would continue at current levels in the existing facilities and training areas.

**Potential Environmental Impacts**

The EA prepared for Dobbins ARB contains a comprehensive evaluation of the existing conditions and environmental consequences of implementing the Proposed Action and the No Action Alternative, as required by NEPA. Based on the findings of the EA, there would be no significant impact on any environmental resources resulting from the Proposed Action or the No Action Alternative. The EA includes best management practices and project design measures to minimize impacts under Alternative 1.

**Public Review and Comment**

The EA and draft FONSI were available to the public for review and comment for a period of 30 days. The public notice was published in the *Atlanta Journal-Constitution* and *Marietta Daily Journal* newspapers. Electronic copies of the EA and the draft FONSI were made available on the Dobbins ARB website at <https://www.dobbins.afrc.af.mil/About-Us/Environmental-Impact/> or by contacting the Dobbins ARB Public Affairs office. No public comments were received. Comments received from agencies consulted are included in Appendix A of the EA.

**NEPA Determination**

Based on the findings of the EA, there would be no significant impacts resulting from the Proposed Action or the No Action Alternative. This FONSI was prepared to accompany the EA, which concludes that preparation of an environmental impact statement is not required for this Proposed Action.

**Approved by:**

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**G.1131440304**

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**8 Sep 21**

Date

Final

Environmental Assessment  
for Construction Projects at  
Dobbins Air Reserve Base, Georgia

August 2021

Prepared for:  
Air Force Reserve Command and Dobbins Air Reserve Base



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## Cover Sheet

### Responsible Agency: Air Force Reserve Command (AFRC)

**Proposed Action:** AFRC and Dobbins Air Reserve Base (ARB) propose the construction of a new Headquarters building and training facilities for the 622nd Civil Engineering Group (622 CEG), a new Logistics Readiness Squadron (LRS) warehouse for the 94th Airlift Wing (AW), and a new Fitness Center designed to meet AFRC mission requirements.

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### Report Designation: Draft Final Environmental Assessment (EA)

**Abstract:** The U.S. Air Force has prepared this EA to evaluate the impacts of constructing new facilities at Dobbins ARB in Cobb County, Georgia, approximately 20 miles northwest of Atlanta and adjacent to the cities of Smyrna and Marietta. The EA analyzes the implementation of the Proposed Action under Alternative 1 (preferred alternative), which identifies specific locations for constructing the new facilities.

Under Alternative 1, the Headquarters building for 622 CEG would be constructed on an approximately 2-acre wooded parcel adjacent to the existing Expeditionary Combat Support – Training & Certification Center classrooms. This location would collocate administrative and classroom functions for the 622 CEG, creating a walkable campus and eliminating unnecessary vehicle traffic travel between administrative and training buildings. The approximately 49-acre Dead Runway site is proposed for the 622 CEG Training Center, which includes a vehicle and equipment storage building and training facility upgrades. The storage building would be constructed in an undeveloped area adjacent to the southeast end of the Dead Runway. Training facility upgrades would support mission training activities, including earth moving, rapid airfield damage recovery, crane operation, mine detection, airfield lighting, mobile aircraft arrest systems, and minimum airfield operating surface repairs. The new LRS warehouse would be constructed on approximately 4 acres of currently forested and grassy land in a well-developed area with access to main roads on the installation. The new Fitness Center would be located on an approximately 6-acre, mostly wooded site, adjacent to the existing running track. Constructing the Fitness Center in this location would collocate fitness activities in one centralized area.

The EA also analyzes a No Action Alternative, which represents baseline conditions used for comparison to future conditions that would exist under the Proposed Action. Under the No Action Alternative, the Proposed Action would not be implemented. Existing operations would continue at current levels in the existing facilities and training areas.

This EA addresses the direct and indirect effects on the natural, social, economic, and physical environments resulting from the assessed alternatives. The information provided in this EA will serve as the basis for Dobbins ARB to determine whether the Proposed Action would have any significant impacts on the environment, which would require an Environmental Impact Statement and a Record of Decision, or no significant impacts, which would result in a Finding of No Significant Impact. The EA also addresses the compliance of the Proposed Action with applicable environmental statutes, such as the Endangered Species Act of 1973 (16 *United States Code* [U.S.C.] Section 1531 et seq.), as amended, and the National Historic Preservation Act of 1966 (54 U.S.C. Section 300101 et seq.), as amended.

The Draft Final EA and Draft FONSI were made available for a public comment period of 30 days from 09 July through 09 August 2021. No comments were received. Comments received from agencies consulted are included in Appendix A.

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## Acronyms and Abbreviations

$\mu\text{g}/\text{m}^3$	Microgram(s) per Cubic Meter
°F	Degree(s) Fahrenheit
94 AW	94th Airlift Wing
AFCEC	Air Force Civil Engineer Center
AFFF	Aqueous Film-Forming Foam
AFP	Air Force Plant
AFRC	Air Force Reserve Command
ARB	Air Reserve Base
AW	Airlift Wing
BASH	Bird/Wildlife Aircraft Strike Hazard
bgs	Below Ground Surface
BMP	Best Management Practice
CAA	Clean Air Act
CEG	Civil Engineering Group
CEQ	Council on Environmental Quality
CEV	Civil Engineering Environmental Flight
CFR	<i>Code of Federal Regulations</i>
CO	Carbon Monoxide
CO <sub>2e</sub>	Carbon Dioxide Equivalent
CWA	Clean Water Act
dBA	A-weighted Sound Pressure Level
DNL	Day-Night Average Sound Level
DoD	Department of Defense
EA	Environmental Assessment
ECS-TCC	Expeditionary Combat Support – Training & Certification Center
EIAP	Environmental Impact Analysis Process
EIS	Environmental Impact Statement
EO	Executive Order
EPA	U.S. Environmental Protection Agency
EPD	Environmental Protection Division
ESA	Endangered Species Act
FONSI	Finding of No Significant Impact
ft <sup>2</sup>	Square Foot (Feet)
GHG	Greenhouse Gas
GSWCC	Georgia Soil and Water Conservation Commission
LRS	Logistics Readiness Squadron

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MBTA	Migratory Bird Treaty Act
MSG	Mission Support Group
MSGP	Multi-Sector General Permit
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NO <sub>2</sub>	Nitrogen Dioxide
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resource Conservation Service
NSR	New Source Review
O <sub>3</sub>	Ozone
OSHA	Occupational Safety and Health Administration
PFAS	Perfluorooctanoic Acid
PFBS	Perfluorobutane Sulfonate
PFOA	Perfluorooctanoic Acid
PFOS	Perfluorooctane Sulfonate
PM <sub>10</sub>	Respirable Particulate Matter Less Than or Equal to 10 Micrometers in Diameter
PM <sub>2.5</sub>	Respirable Particulate Matter Less Than or Equal to 2.5 Micrometers in Diameter
ppm	Part(s) per Million
RADR	Rapid Airfield Damage Recovery
ROI	Region of Influence
RSL	Regional Screening Level
SO <sub>2</sub>	Sulfur Dioxide
TSS	Total Suspended Solids
U.S.C.	<i>United States Code</i>
UFC	Unified Facilities Criteria
USAF	U.S. Air Force
USAR	U.S. Army Reserve
USDOT	U.S. Department of Transportation
USGS	U.S. Geologic Survey
VOC	Volatile Organic Compound

# 1. Introduction

This environmental assessment (EA) was developed to evaluate the impacts of constructing three new facilities at Dobbins Air Reserve Base (ARB) in Georgia. The new construction would include a warehouse, a fitness facility, and a training center.

This EA evaluates the potential environmental consequences of the Proposed Action and alternatives in accordance with the provisions of the *Code of Federal Regulations* (CFR) Title 32, Part 989, and 40 CFR Parts 1500 through 1508, which are the Council on Environmental Quality's (CEQ's) National Environmental Policy Act (NEPA) implementing regulations, and Air Force Instruction 32-1015, *Integrated Installation Planning*, which also integrates the environmental impact analysis process (EIAP).

## 1.1 Background

Dobbins ARB is located on 1,663 acres of land in Cobb County, Georgia, approximately 20 miles northwest of Atlanta and adjacent to the cities of Smyrna and Marietta, as shown on Figure 1-1. Cobb Parkway (Highway 41) borders Dobbins ARB on the eastern boundary and provides the primary access route to the Base.

Dobbins ARB is home to the Air Force Reserve Command's (AFRC's) 94th Airlift Wing (94 AW) and headquarters to the 22nd Air Force. As a multi-service Reserve training base, the 94 AW is host to several tenant units, including the Georgia Army National Guard, Georgia Air National Guard, U.S. Army Reserve (USAR), Navy Reserve, and Marine Corps Reserve.

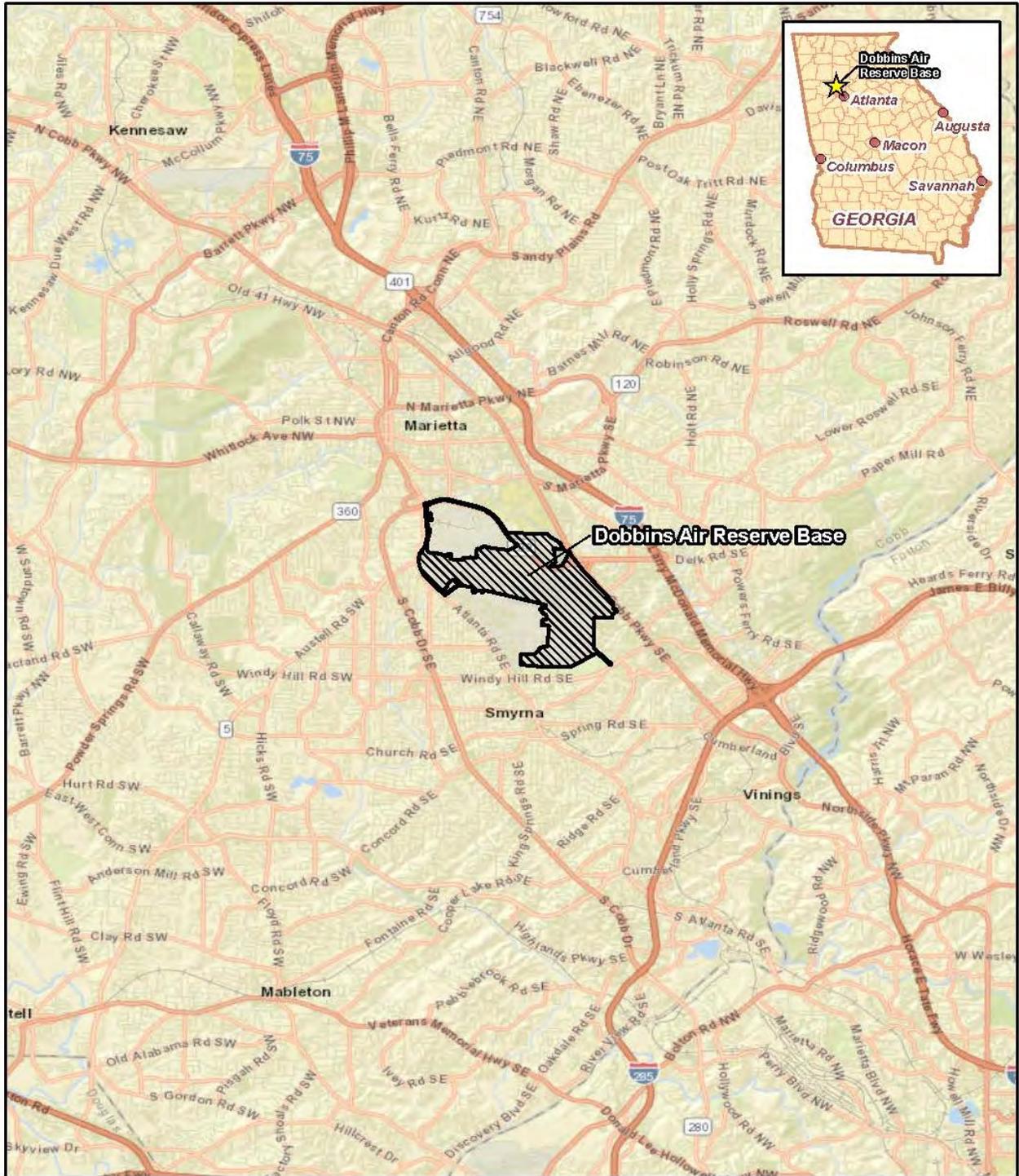
Dobbins ARB has conducted several planning studies intended to maximize efficient use of the space available on the installation, including an Installation Development Plan, Area Development Plans, Campus Plan, and a Facilities Operational Capabilities and Utilization Survey. The installation is divided into five planning districts based on broad functional use: the Airfield District, the Flightline District, the Mission Support District, the Training District, and the Joint Use District (Figure 1-2). This EA focuses on the planning efforts for three facilities and associated training requirements: 622nd Civil Engineering Group (622 CEG), Logistics Readiness Squadron (LRS), and Dobbins ARB's Fitness Center.

The 622 CEG, Detachment 1, provides specialized certification training for a range of civil engineering skills and functions. The Expeditionary Combat Support – Training & Certification Center (ECS-TCC) administers mission essential equipment training and expeditionary, contingency, and upgrade training, with classroom learning and hands-on heavy equipment skills training. The ECS-TCC courses include airfield damage repair, fire response training, runway marking, crane operations, aircraft arresting systems, minefield detection, airfield lighting systems, and base expeditionary airfield resources. ECS-TCC trains approximately 1,000 students annually (AFRC, 2021a).

The 622 CEG facilities and training areas are distributed across several planning districts. Building 729, which housed the 622 CEG, is being renovated for occupancy by the 94 AW, leaving the 622 CEG with no permanent location. ECS-TCC heavy equipment training, fire training, and mine detection operations are located within the Dobbins Training District. These training functions are located along a decommissioned portion of airfield pavement known as the Dead Runway Training Area (Dead Runway). Training facilities on the Dead Runway are undersized and in need of repair and upgrades to support continued heavy equipment training (AFRC, 2021a).

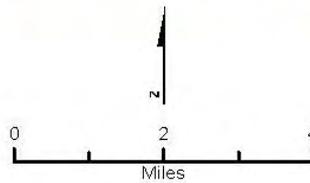
The LRS Base Hazardous Material Storage (Building 810) and Base Supply Warehouse (Building 812) are located in the Mission Support District. These two facilities are encircled by four streets and parking lot or existing structures on three sides, with an open area with grass and trees to the east. These facilities are difficult to access and are landlocked, making expansion to correct the layout deficiencies infeasible. The warehouse has inadequate vertical storage, resulting in an inefficient use of space and a waste of supply technicians' time as they have to continuously move containers. Additionally, the building systems in both buildings have degraded and require increased maintenance, and the warehouse lighting does not meet Unified Facilities Criteria (UFC) lighting requirements (AFRC, 2021b).

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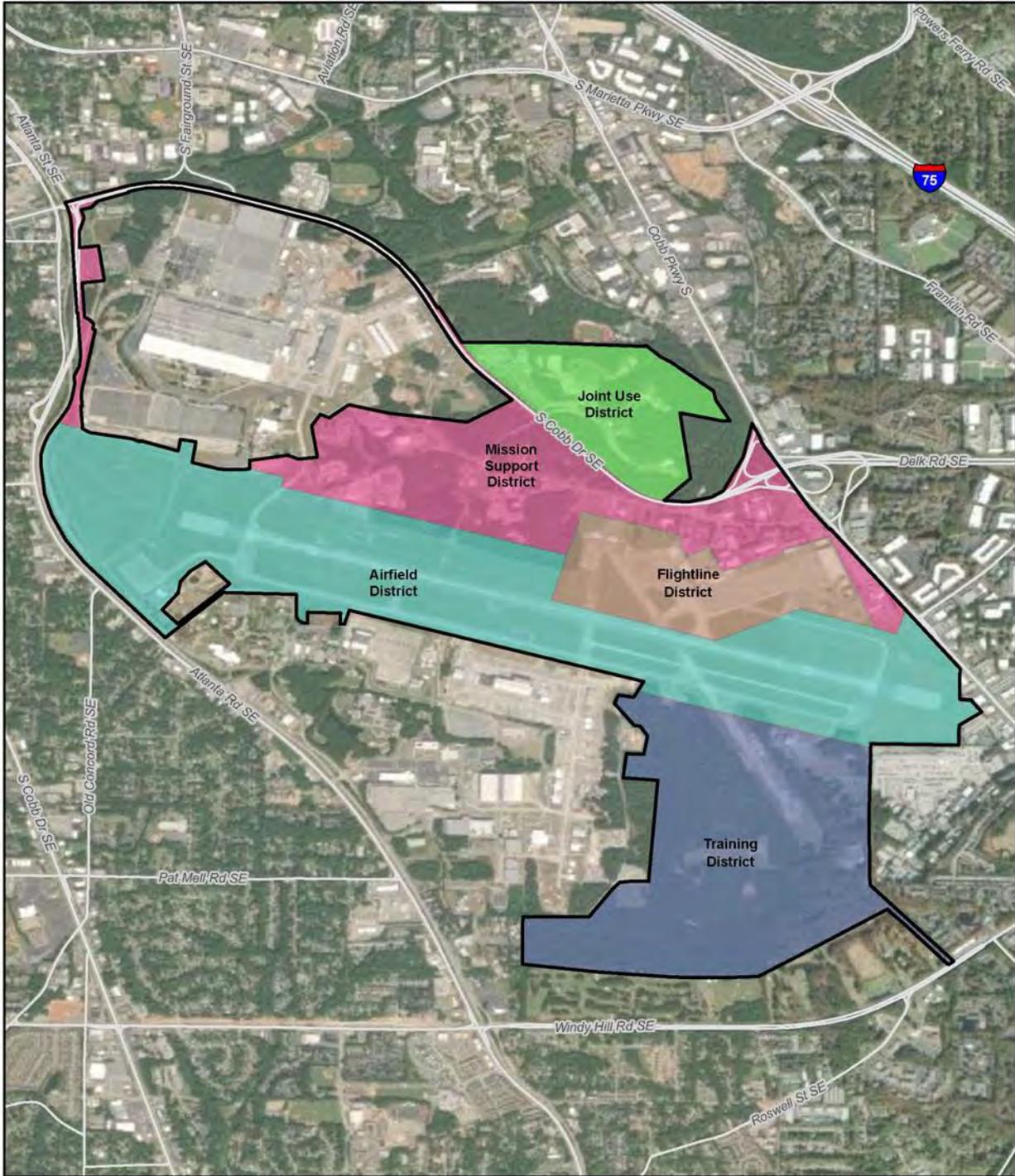
**Legend**

 Dobbins Air Reserve Base



**Figure 1-1**  
**Vicinity Map**  
 Dobbins Air Reserve Base, Georgia

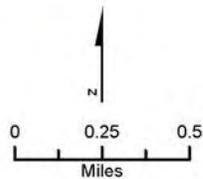
Basemap Source: Esri World Street Map



**Legend**

- Dobbins Air Reserve Base
- Joint Use District
- Planning Districts**
- Airfield District
- Mission Support District
- Flightline District
- Training District

Basemap Source: Esri World Imagery, Maxar, 10/4/2020



**Figure 1-2**  
**Planning Districts**  
 Dobbins Air Reserve Base, Georgia

The existing Fitness Center (Building 486) was constructed in 1959 and was renovated in 2014. The building is undersized at approximately one-third of the required size, not efficiently configured, and is not easily accessible to users. The building is closed for mold remediation and roof repair.

## 1.2 Purpose and Need

The purpose of the Proposed Action is to provide new permanent facilities that meet installation architectural standards, local building codes, and Department of Defense (DoD) UFC, which provide technical criteria and guidance for standardized planning, design, construction, and operation and maintenance of DoD's real property facilities. The new facilities are needed to support Dobbins ARB's current and future mission needs. The Proposed Action would provide modern facilities and training areas that are properly sized and designed for the intended use, collocate similar staff functions, and ensure land use consistent with installation planning guidelines.

The 622 CEG will be moved out of Building 729 and relocated to temporary buildings near the existing classrooms on Ridenour Drive. A new 622 Headquarters building is needed to provide the 622 CEG with a permanent operational location, which would contribute to their ability to prepare and train Airmen and other military units that rely on the 622 CEG for engineer training.

The 622 CEG's ECS-TCC training facilities need to be upgraded so that training is conducted in areas that are properly sized for the current mission at its existing level of participation, while also accommodating an increase in the number of Reservists proposed to train annually. This mission-required training includes earth moving, crane operation, mine detection, airfield lighting, mobile aircraft arrest systems, minimum airfield operating surface repairs, and rapid airfield damage recovery (RADR).

A properly-sized LRS warehouse is needed to allow staff to work in properly sized and configured facilities that meet mission requirements and result in efficient use of time and resources. Operations and maintenance costs would be lower than with continued use of aging and failing building systems, including roofing, exterior enclosures, electrical panel boards, domestic water distribution, and waste piping.

A properly-sized Fitness Center is needed to provide users with gym facilities that are appropriately sized for an installation of Dobbins ARB's size, and consistent with current fitness facility standards comparable to what is available in the private sector.

## 1.3 Relevant Plans, Laws, and Regulations

A decision on whether to proceed with the Proposed Action depends on numerous factors, including mission requirements, regulatory requirements, and environmental considerations. In addressing environmental considerations, Dobbins ARB is guided by relevant statutes, along with the corresponding regulations for implementation, and Executive Orders (EOs) that establish standards and provide guidance on environmental and natural resources management and planning.

## 1.4 Summary of Key Environmental Compliance Requirements

### 1.4.1 National Environmental Policy Act

NEPA (42 *United States Code* [U.S.C.] Sections 4321 through 4347) is a federal statute requiring the identification and analysis of potential environmental impacts associated with proposed federal actions before those actions are taken. The intent of NEPA is to help decision makers make well-informed decisions based on understanding the potential environmental consequences and take actions to protect, restore, and enhance the environment.

The process for implementing NEPA is codified in 40 CFR Parts 1500 through 1508, "Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act." The CEQ regulations specify that an EA must be prepared to provide evidence and analysis for determining whether to prepare a finding of no significant impact (FONSI) or an environmental impact statement (EIS). The EA can aid in

an agency's compliance with NEPA if an EIS is unnecessary and facilitate preparation of an EIS if one is required.

The U.S. Air Force (USAF) complies with subsidiary regulations, when applicable.

#### **1.4.2 Integration of Other Environmental Statutes and Regulations**

To comply with NEPA, the planning and decision-making processes for actions proposed by federal agencies involve a study of other relevant environmental statutes and regulations. According to CEQ regulations, the requirements of NEPA can be integrated "with other planning and environmental review procedures required by law or by agency practice so that all such procedures run concurrently rather than consecutively" (40 CFR Section 1500.2[c]).

Applicable federal statutes include the following:

- Clean Water Act of 1977 (CWA; 33 U.S.C. Section 1344)
- Clean Air Act (CAA; 42 U.S.C. Section 7401)
- Endangered Species Act of 1973 (ESA; 16 U.S.C. Section 1531)
- National Historic Preservation Act of 1966 (54 U.S.C. Sections 302101–302108)
- Safe Drinking Water Act (42 U.S.C. Sections 300f et seq.)
- Resource Conservation and Recovery Act of 1976 (42 U.S.C. Section 6901)
- Migratory Bird Treaty Act (MBTA; 16 U.S.C. Sections 701 et seq.)
- Migratory Bird Conservation Act (16 U.S.C. Sections 715–715d, 715e, 715f–715r)
- Bald and Golden Eagle Protection Act of 1940 (16 U.S.C. Sections 668-668c)
- Water Resource Development Act

The NEPA analysis also considers compliance with EOs related to the protection of wetlands (EO 11990), environmental justice (EO 12898), protection of children (EO 13045), and management of floodplains (EO 11988) and invasive species (EO 13751).

In addition to CWA requirements, the USAF's actions must comply with EO 11990, "Protection of Wetlands," and EO 11988, "Floodplain Management" when one or both of these EOs apply. Dobbins ARB published an early public notice that the Proposed Action would occur adjacent to the 100-year floodplain and wetlands in the *Marietta Daily Journal* and *Atlanta Journal Constitution*.

#### **1.4.3 Interagency Coordination and Public Involvement**

Scoping is an early and open process for developing the breadth of issues to be addressed in the EA and for identifying significant concerns related to a Proposed Action. Per the requirements of the Intergovernmental Cooperation Act of 1968 (42 U.S.C. 4231(a)) and EO 12372, "Intergovernmental Review of Federal Programs," federal, state, and local agencies with jurisdiction that could be affected by the Proposed Action were notified during the development of this EA. Appendix A contains the list of agencies consulted during this analysis and copies of correspondence.

An early Public Notice was published in the *Marietta Daily Journal* and the *Atlanta Journal Constitution* newspapers to inform the public of the preparation of this EA and the potential for these projects to encroach upon the 100-year floodplain and wetlands. A notice of the availability of the EA and Draft FONSI was published in the *Marietta Daily Journal* and the *Atlanta Journal Constitution* newspapers to initiate the 30-day public review period for the EA and Draft FONSI. No comments were received from the public.

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## 2. Description of Proposed Action and Alternatives

CEQ regulations require that all reasonable alternatives be evaluated under NEPA. Alternatives may be eliminated from detailed analysis in a NEPA document based on being unfeasible and based on operational constraints, technical constraints, or substantially greater environmental impacts relative to other alternatives under consideration. For this EA, the Proposed Action (under Alternative 1) and a No Action Alternative are analyzed. Figure 2-1 shows the general location of the projects.

### 2.1 Proposed Action

The Proposed Action includes the construction of new facilities as outlined in this section. The proposed facilities would comply with base architectural compatibility standards and other DoD, USAF, and installation design standards, including antiterrorism/force protection, Americans with Disabilities Act, and fire code requirements, per UFC. Facilities would have sustainable principles, including life-cycle cost-effective practices that would be integrated into design, development, and construction of the project in accordance with the Energy Policy Act of 2005 and other applicable laws and EOs.

#### 2.1.1 622 CEG Headquarters Building and Training Center

The Proposed Action includes construction of a new 12,543 square-foot (ft<sup>2</sup>) Headquarters building for 622 CEG leadership and administrative functions; a 20,000-ft<sup>2</sup> climate-controlled storage building with electrical capabilities to accommodate 48 pieces of equipment used for RADR training; and upgraded facilities for training operations.

The Headquarters building would include a reinforced concrete foundation, concrete slab, pre-engineered structure, sloped metal roofing, site improvements (access road/parking/sidewalks, stormwater management), and all necessary supporting facilities, utilities, and controls. The storage building would include a 100- by 200-foot building on a 150- by 400-foot concrete pad.

The training activities include earth moving, RADR, crane operation, mine detection, airfield lighting, mobile aircraft arrest systems, and minimum airfield operating surface repairs. The ECS-TCC conducts nine different courses on the Dead Runway, each conducted up to a total of 10 times per year. The total of all courses conducted could be up to 90 offerings annually. No additional permanent party positions would be created as a result of this training. The expanded facilities could accommodate up to 2,000 Reservists, which is approximately double the number able to train at the existing facilities.

#### 2.1.2 94 LRS Warehouse

The Proposed Action includes construction of a new LRS warehouse to replace the existing facilities (Buildings 810 and 812). The new 56,295-ft<sup>2</sup> LRS Supply Facility would consist of 16,113 ft<sup>2</sup> of administrative space, 38,998 ft<sup>2</sup> of warehouse space, and 1,184 ft<sup>2</sup> of hazardous material storage. The warehouse would include a reinforced concrete foundation, concrete slab, reinforced masonry or concrete walls, energy efficient roofing, site improvements (access road/parking, sidewalks, stormwater management), and all necessary supporting facilities, utilities, and controls (AFRC, 2021b).

#### 2.1.3 Fitness Center

The Proposed Action includes construction of a new 36,436- ft<sup>2</sup> Fitness Center to replace the existing Fitness Center (14,930 ft<sup>2</sup>). The new Fitness Center would include a lobby, administrative areas, restrooms/locker rooms, cardiovascular and weight conditioning areas, counseling area, support areas, and storage. The building would include a reinforced concrete foundation, concrete slab, reinforced masonry walls, structural steel frame, roofing, site improvements (access road/parking/sidewalks, stormwater management), and all necessary supporting facilities, utilities, and controls.

## **2.2 Alternatives**

### **2.2.1 Alternative 1 – New Construction (Preferred Alternative)**

#### **2.2.1.1 622 CEG Headquarters Building and Training Center**

Under Alternative 1, the Headquarters building for 622 CEG would be constructed in the Joint Use District, on an approximately 2-acre wooded parcel adjacent to the existing ECS-TCC classroom campus on Ridenour Drive. The campus consists of eight buildings and a parking lot. Constructing the new Headquarters building in this location would collocate administrative and classroom functions for the 622 CEG, creating a walkable campus and eliminating unnecessary vehicle traffic travel between administrative and training buildings. Figure 2-2 shows the location of the 622 Headquarters building under Alternative 1.

The approximately 49-acre Dead Runway site, shown on Figure 2-3, is the proposed location for the 622 CEG Training Center, which includes a vehicle and equipment storage building and training facility upgrades. The storage building would be constructed in the grassy, undeveloped area adjacent to the southeast end of the Dead Runway, southeast of the aircraft fire training pit. The building's proximity to the location of the engineer training would make access to vehicles and equipment convenient and efficient. The size of this facility could be adjusted to include a smaller footprint if the 622 CEG is able to acquire Building 1011 for use as a storage facility; however, multiple users are being considered for this building at this time. Building 1011 is used by a USAR unit that is scheduled to vacate the facility in 2022.

Earth-moving activities include engineer training using bulldozers, backhoes, and other equipment. This training could be conducted on the southwest end of the Dead Runway or in the southeastern portion of the site currently occupied by the USAR.

Runway repair would include continued legacy crater repair operations on the Dead Runway, as well as the new mission requirement for RADR training. Legacy operations would continue at the two existing craters on the north end of the Dead Runway or on a new 100- by 1,400-foot concrete pad constructed to the southwest of the Dead Runway. In order to continue legacy operations and incorporate the new RADR mission, use of the USAR apron and the new 100- by 1,400-foot runway expansion is required.

Crane training currently occurs on the southern end of the Dead Runway and would continue to be conducted in this area or on the paved area at the USAR facility once vacated. Crane training involves lifting and moving objects from one location to another and does not require any ground disturbance.

Mine identification training currently occurs within lanes constructed in an open-air pavilion on the Dead Runway. This training will continue and there are no proposed modifications at this time.

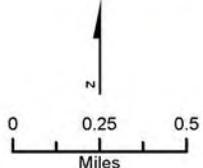
If the 622 CEG Training Center receives permission to use the area occupied by the USAR once vacated, a road would be constructed to link this area to the Dead Runway.

#### **2.2.1.2 94 LRS Warehouse**

Under Alternative 1, a new LRS warehouse would be constructed in the Mission Support District and would occupy approximately 4 acres of currently forested and grassy land adjacent to the existing Base Exchange (Building 530), Vehicle Maintenance Facility (Building 516), and Civil Engineering (Building 501). This area of Dobbins ARB is well-developed and has access to Atlantic Avenue and Industrial Drive. A new and properly laid out facility could accommodate the full LRS storage requirement within one consolidated building and maximize staff efficiency by reducing the need to move containers constantly, which is the current situation because of the lack of vertical storage space. Figure 2-4 shows the location of the LRS warehouse as proposed under Alternative 1.



**Legend**  
[Black Outline] Dobbins Air Reserve Base  
[Red Outline] Proposed Project Areas



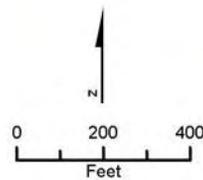
**Figure 2-1**  
**General Location Map**  
Dobbins Air Reserve Base, Georgia

Basemap Source: Esri World Imagery, Maxar, 10/4/2020



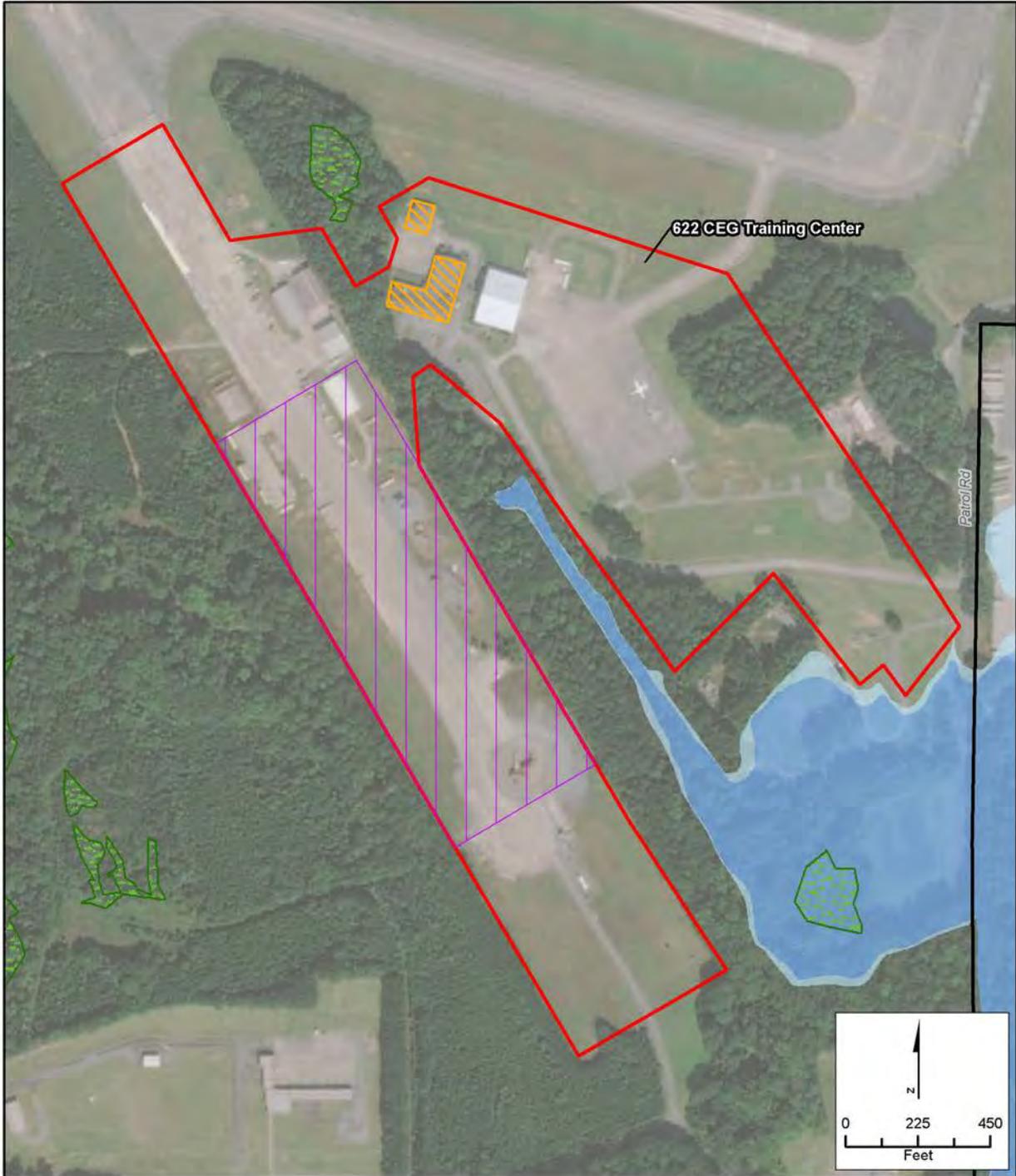
**Legend**

-  Dobbins Air Reserve Base
-  Proposed Project Area
-  100-year Floodplain
-  500-year Floodplain
-  Wetland



**Figure 2-2**  
Proposed Project Area (Approximate)  
622 CEG Headquarters Building  
Dobbins Air Reserve Base, Georgia

Basemap Source: Esri World Imagery, Maxar, 10/4/2020



**Legend**

- |                          |                               |
|--------------------------|-------------------------------|
| Dobbins Air Reserve Base | Wetland                       |
| Proposed Project Area    | Demolished Building           |
| 100-year Floodplain      | PFAS No Soil Disturbance Area |
| 500-year Floodplain      |                               |

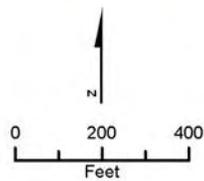
**Figure 2-3**  
**Proposed Project Area (Approximate)**  
**622 CEG Training Center**  
 Dobbins Air Reserve Base, Georgia

Basemap Source: Esri World Imagery, Maxar, 10/4/2020



**Legend**

-  Dobbins Air Reserve Base
-  Proposed Project Area
-  Wetland



**Figure 2-4**  
**Proposed Project Area (Approximate)**  
**94 LRS Warehouse**  
Dobbins Air Reserve Base, Georgia

Basemap Source: Esri World Imagery, Maxar, 10/4/2020

### **2.2.1.3 Fitness Center**

Under Alternative 1, the new Fitness Center would be located on an approximately 6-acre, mostly wooded site in the Joint Use District, adjacent to the existing running track. Constructing the Fitness Center in this location would collocate fitness activities in one centralized area.

The western portion of the Fitness Center site includes a 2.3-acre dirt and gravel area used for 622 CEG overhead electrical and power plant training. An access road to reach the gym would be added between this training area and the existing restroom structure beside the running track. The 622 CEG training area would be avoided during site development. Figure 2-5 shows the location of the Fitness Center as proposed under Alternative 1.

### **2.2.2 No Action Alternative**

The No Action Alternative represents baseline conditions, which are used for comparison to future conditions that would exist under the Proposed Action. Under the No Action Alternative, the Proposed Action under Alternative 1 would not be implemented. The construction of new facilities would not occur, which does not meet current USAF requirements. Existing operations would continue at current levels in the existing facilities and training areas.

The 622 CEG would be forced to operate without a permanent operational location and in temporary facilities that do not meet USAF standards. The 622 CEG's ECS-TCC would not meet its mission requirement for RADR and other civil engineering expeditionary training and would not be able to accommodate additional Reservists proposed for training. LRS warehouse staff would continue to work in improperly sized and configured facilities that do not meet mission requirements and result in inefficient use of time and resources. Users of the Fitness Center would continue to use substandard gym facilities.

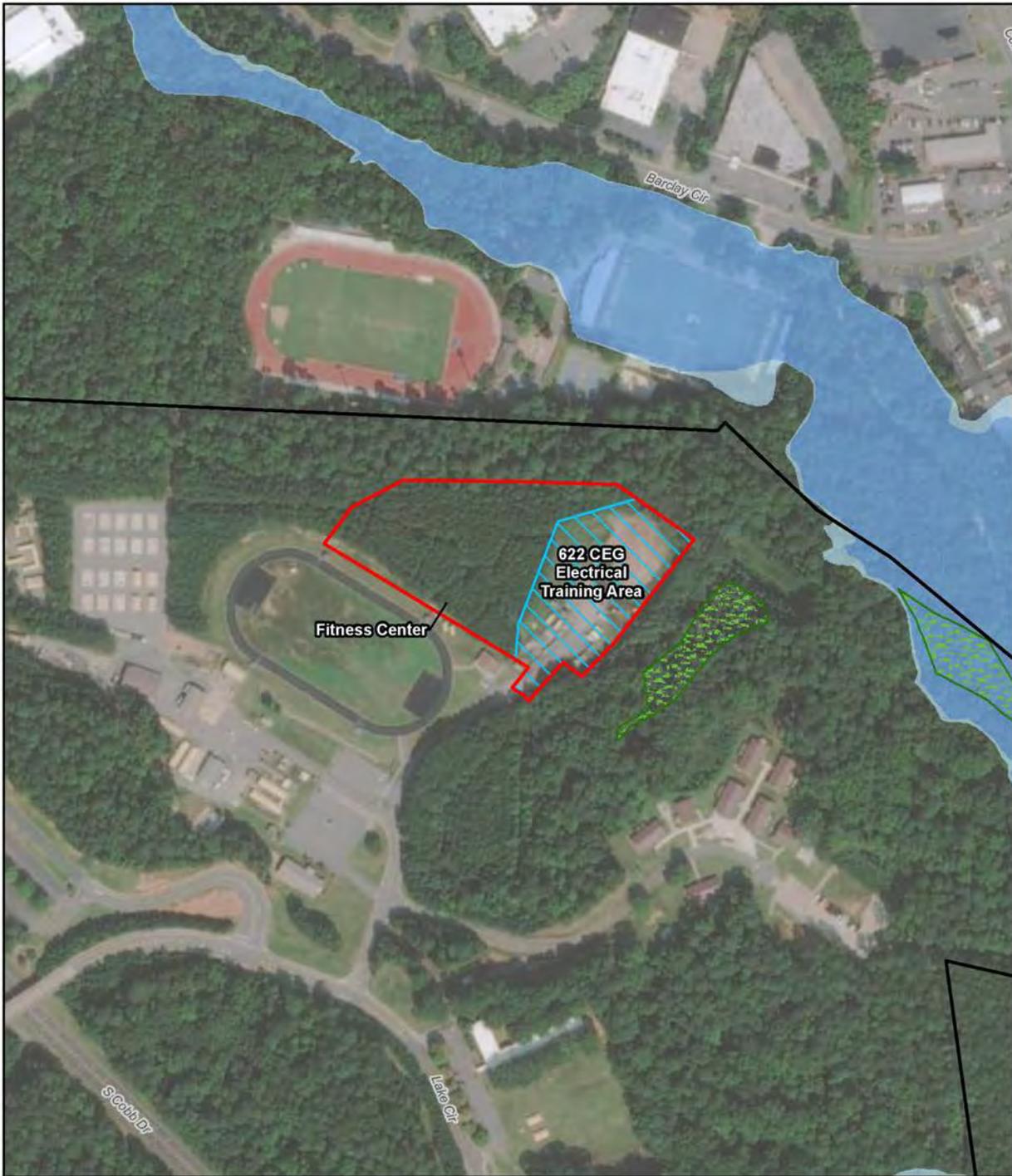
### **2.2.3 Alternatives Considered but Eliminated from Further Consideration**

Dobbins ARB considered the following alternatives but did not select them to be carried through for full evaluation. If during the continued planning process these alternatives are to be carried forward, then the necessary NEPA analysis as noted for each would be conducted:

- Early discussion regarding siting for the 622 CEG Headquarters building included the possibility of constructing the building in the Training District in the vicinity of the Dead Runway near the existing USAR facility. Long-term planning for Dobbins ARB prioritizes real estate in the Training District for designated training operations instead of taking up space for administrative functions that would be better suited in areas of similar land use. Additionally, this location would mean that administrative and classroom training functions would be split and located on opposite ends of the installation, resulting in wasted time traveling between the two locations. If construction of the 622 CEG Headquarters building in the vicinity of recently demolished buildings near Building 1011 were considered again (Figure 2-3), Dobbins ARB would initiate a separate NEPA review, likely qualifying the project for a categorical exclusion under the USAF's NEPA regulation (Appendix B to 32 CFR Part 989, categorical exclusion A2.3.11) since the impacts would be expected to be similar to the impacts identified for the Proposed Action under Alternative 1. The area has already been developed and impacts would be expected to be negligible to minor.
- The location of the new Fitness Center initially included development within the area that the 622 CEG uses for overhead electrical and power plant training; however, there is a lack of appropriate space available to relocate these training activities. The project area for the Fitness Center evaluated in this EA includes the training area to allow for flexibility in project siting. If that area were determined to be necessary for the Fitness Center, then this EA would cover the proposed development. Relocation of the electrical and power plant training conducted in that area would require separate NEPA analysis once a new training location was identified.
- Renovation of the existing LRS warehouse buildings (Buildings 810 and 812) and an addition to nearby Building 819 were considered instead of constructing a new facility; however, this option would not solve access issues or consolidate operations into a single facility. If this option were

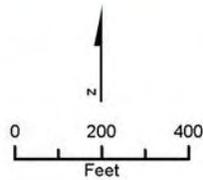
pursued, renovation of existing buildings would be documented under a separate NEPA review, likely qualifying the project for a categorical exclusion under the USAF's NEPA regulation (Appendix B to 32 CFR Part 989, categorical exclusion A2.3.11) since the impacts would be expected to be similar to the impacts identified for the Proposed Action under Alternative 1. The locations of the existing LRS warehouse and proposed expansion are shown on Figure 2-6.

- Renovation and expansion of the existing Fitness Center was considered; however, the small amount of land adjacent to the existing Fitness Center would require additional site work to accommodate for steep slopes and drainages and would not allow for consolidation of fitness facilities (running track). If renovation and expansion of the existing Fitness Center were considered again, then details on the area to be developed as part of the expansion would be analyzed and documented under a separate NEPA review. If the expansion avoided impacts to the adjacent creek area and provided appropriate stormwater management, then impacts would be expected to be negligible to minor, likely qualifying the project for a categorical exclusion under the USAF's NEPA regulation (Appendix B to 32 CFR Part 989, categorical exclusion A2.3.11) since the impacts would be expected to be similar to the impacts identified for the Proposed Action under Alternative 1. The location of the existing Fitness Center is shown on Figure 2-7.



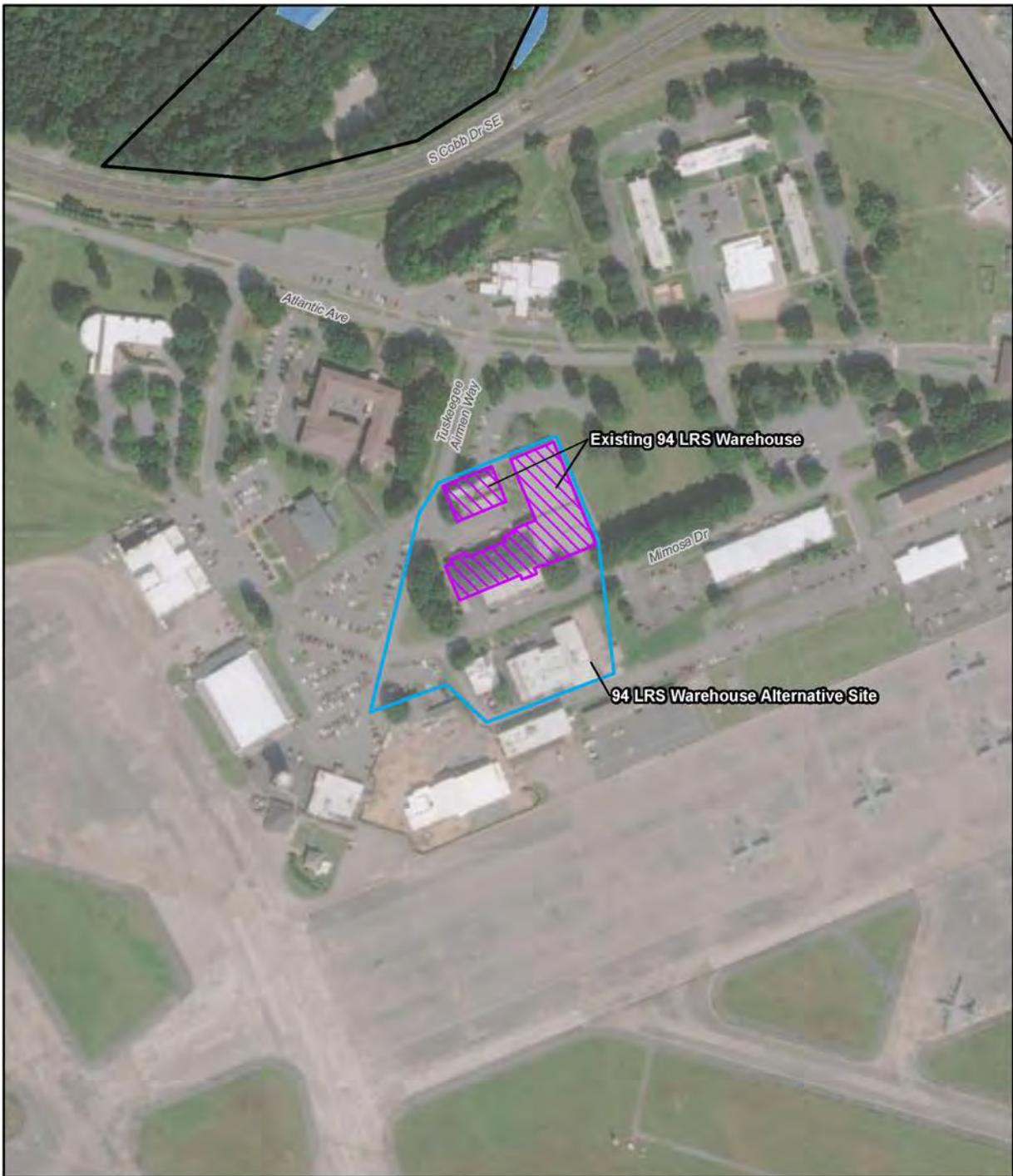
**Legend**

- |                          |                     |
|--------------------------|---------------------|
| Dobbins Air Reserve Base | 100-year Floodplain |
| Proposed Project Area    | 500-year Floodplain |
| Current Land Use         | Wetland             |



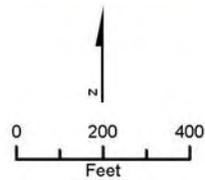
**Figure 2-5**  
**Proposed Project Area (Approximate)**  
**Fitness Center**  
 Dobbins Air Reserve Base, Georgia

Basemap Source: Esri World Imagery, Maxar, 10/4/2020



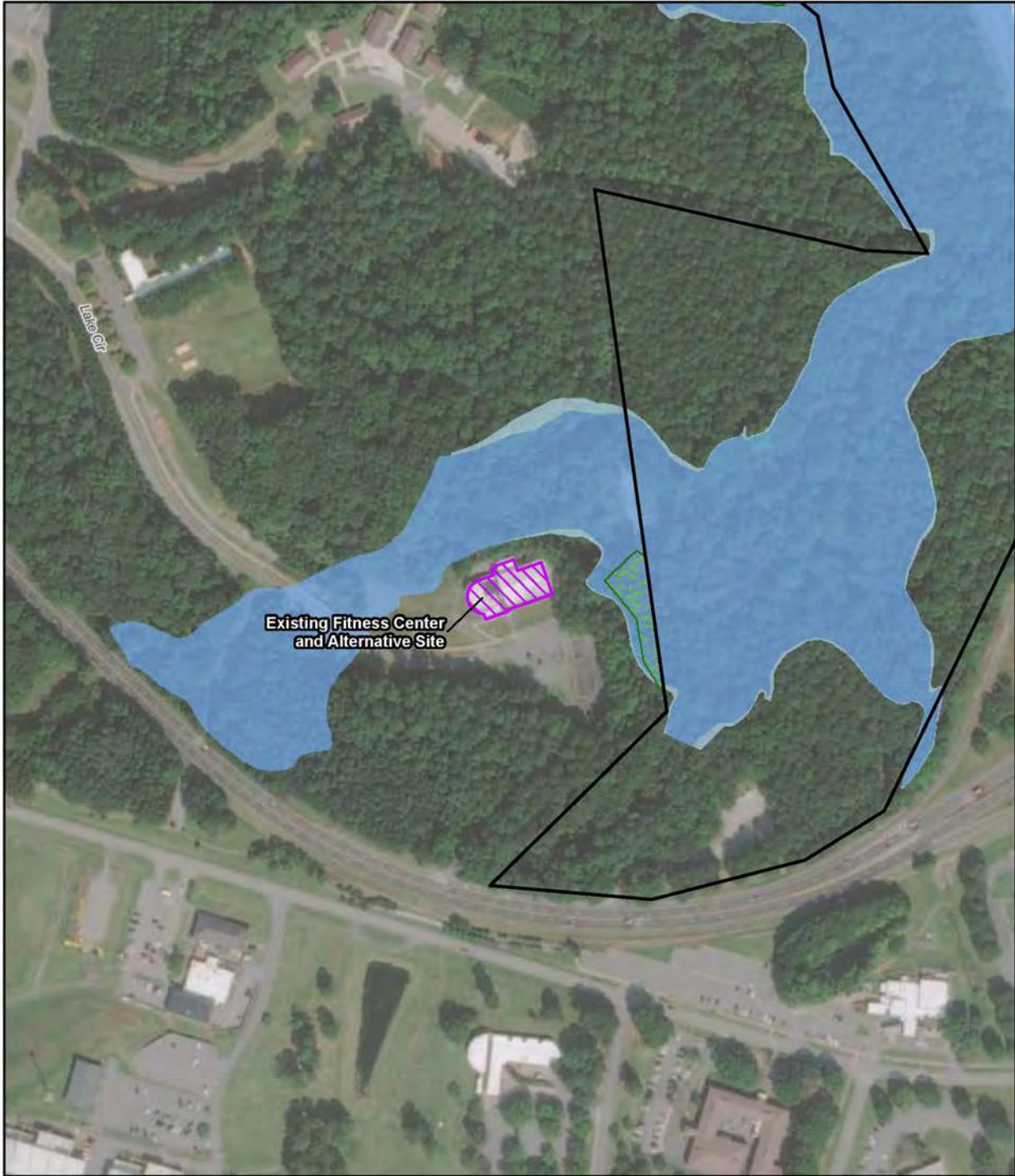
**Legend**

- Dobbins Air Reserve Base
- 100-year Floodplain
- Existing 94 LRS Warehouse
- 500-year Floodplain
- 94 LRS Warehouse Alternative Site



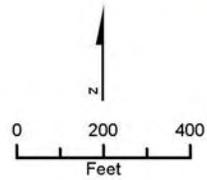
**Figure 2-6**  
**Existing 94 LRS Warehouse and**  
**Alternative Site**  
 Dobbins Air Reserve Base, Georgia

Basemap Source: Esri World Imagery, Maxar, 10/4/2020



**Legend**

-  Dobbins Air Reserve Base
-  Existing Fitness Center and Alternative Site
-  100-year Floodplain
-  500-year Floodplain



Basemap Source: Esri World Imagery, Maxar, 10/4/2020

**Figure 2-7**  
**Existing Fitness Center and**  
**Alternative Site**  
Dobbins Air Reserve Base, Georgia

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### 3. Affected Environment and Consequences

This section describes the existing environmental and socioeconomic conditions at Dobbins ARB that could be affected by implementation of the Proposed Action and No Action Alternative.

This analysis considers both the duration and the magnitude of impacts. Duration is described as either short-term or long-term; short-term effects would occur only with respect to a particular activity for a finite period, a year or less, or only during the time required for construction or installation activities, while long-term effects would more likely be persistent and chronic. The magnitude of an impact refers to its severity and takes into account beneficial and adverse impacts. The determination of magnitude factors in the following:

- Level of community concern associated with potential impacts on human health.
- Whether the action establishes a precedent for further actions with significant effects.
- Level of uncertainty about projected impacts.
- Extent to which the impact may conflict with federal, state, or local environmental protection laws or constrain future activities.

The thresholds of change for the magnitude of impacts are defined as follows:

- No Impact: The action does not cause a change.
- Negligible: The impact is at the lowest level of detection and is discountable or hardly noticeable.
- Minor: The impact is slight but detectable.
- Moderate: The impact is readily apparent.
- Major: The impact is severely adverse or exceptionally beneficial.

Impacts ranging from negligible to moderate would be less than significant, while major impacts would be significant. In the following sections, potential beneficial impacts are discussed separately from potential adverse impacts, and measures to avoid or minimize potential adverse impacts to the environment, including those that would otherwise be significant, are presented.

A direct impact is the result of the Preferred Alternative and occurs at the same time and place as the action. The most severe environmental degradation may not result from the direct effects of any particular action; instead, they may result from the indirect effects of the combination of effects of multiple, independent actions over time.

Projects planned at Dobbins ARB are summarized in Table 3-1.

**Table 3-1. Types of Other Recently Completed, Ongoing, or Planned Projects**  
*Environmental Assessment for Construction Projects at Dobbins ARB, Georgia*

Proponent	Action Location/Description	Timeframe
Lockheed Martin	Removal of existing wastewater treatment plan	TBD
Dobbins ARB	Construction of new commercial gate	2020
Dobbins ARB	Small Arms Range upgrades	2019
Dobbins ARB	New Fire Station under construction	2021 (estimated)
Dobbins ARB	Construction of a new 5-pound explosive ordnance disposal training range that includes a safe/non-explosive training area; munitions storage area admin building; 16-bay multi-cube munitions storage facility; 5 earthen magazine covered igloos; suspect vehicle holding area; and demolition of abandoned structures.	TBD

Source: AFRC, 2020

## 3.1 Resources Eliminated from Detailed Analysis

The following resource areas have been eliminated from detailed analysis in the EA because there would be no to negligible impacts to these resources from the Proposed Action under Alternative 1, which is the Preferred Alternative. Therefore, these resource areas are not discussed further in the EA.

### 3.1.1 Land Use

Dobbins ARB encompasses 1,666 acres between the cities of Smyrna and Marietta, approximately 15 miles northwest of the center of Atlanta (Dobbins ARB, 2018). Dobbins ARB is divided into five planning districts: Airfield, Flightline, Mission Support, Training, and Joint Use. The 622 CEG Headquarters building and Fitness Center would be constructed within the Joint Use District; the 94 LRS warehouse would be constructed within the Mission Support District; and the 622 CEG Training Center would be constructed within the Training District. All proposed facilities and activities would be consistent with the land use identified for each district; therefore, this resource is excluded from further discussion.

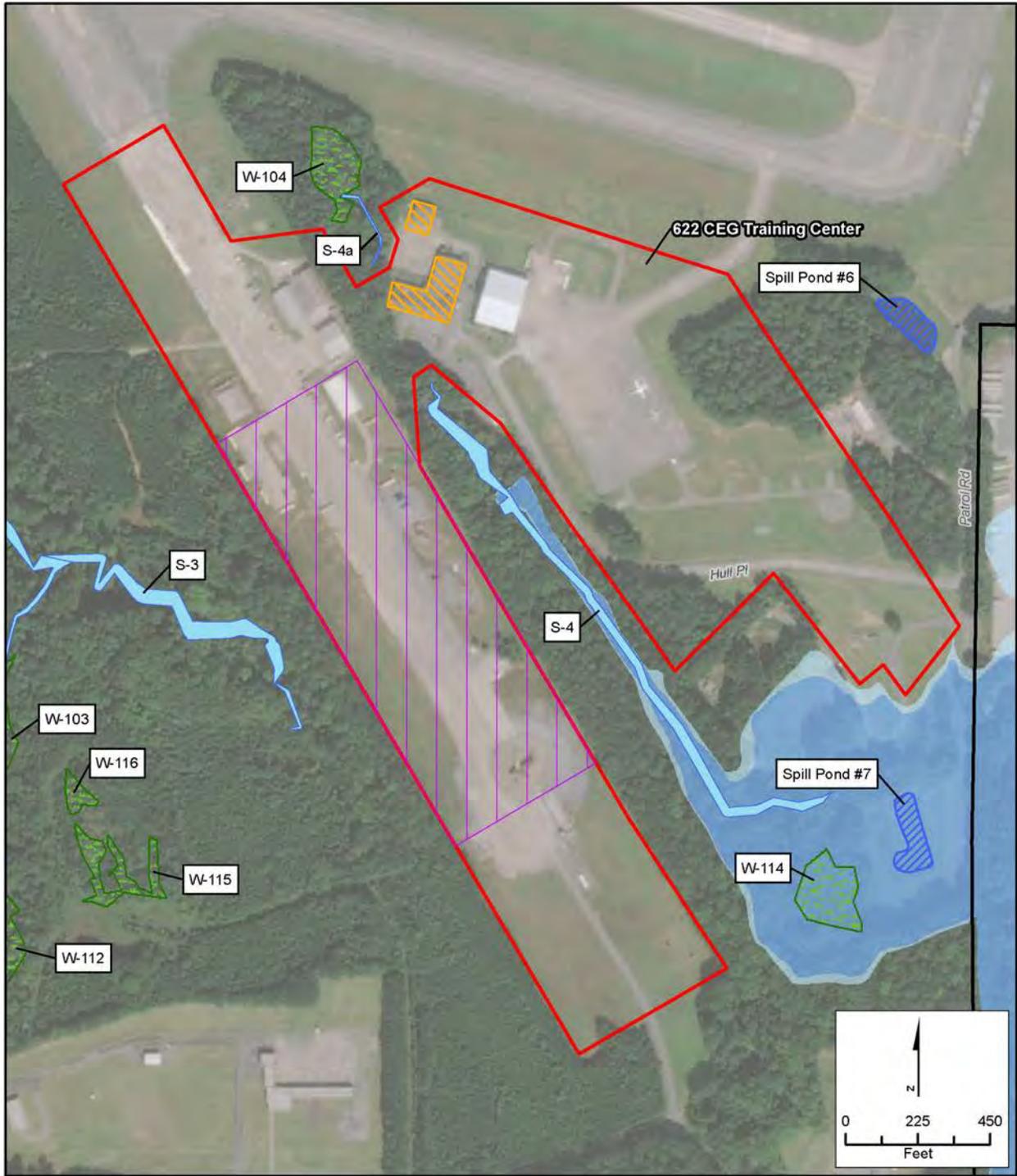
### 3.1.2 Groundwater

Groundwater under Dobbins ARB consists of a surficial water table and bedrock aquifers; however, the bedrock aquifers beneath the Base are generally not productive and contain a high concentration of minerals. The aquifer beneath Dobbins ARB is unconfined and characterized by three geologic strata: residual soils, underlying fractured bedrock, and the competent bedrock. The residual soils and underlying fractured bedrock provide the dominant pathway for groundwater flow. Groundwater in the northern Piedmont Physiographic Province occurs predominantly in joints and fractures in the bedrock and in the pore spaces of the overlying residual soils. Recharge is principally from rainfall that either seeps downward through the soils overlying the bedrock or flows into openings in exposed rock. Depth to groundwater varies in the northern portion of the Base from approximately 12 feet below ground surface (bgs) on the eastern portion of Dobbins ARB to 60 feet bgs on the west side of the Base. Groundwater levels at a remedial investigation site in the southern area of Dobbins ARB were found to range from approximately 18 to 30 feet bgs (AFRC, 2020).

The construction of the new facilities would not require excavation to the depth of groundwater and the new facilities would not require the use of groundwater. The depth of ground disturbance from training activities at the 622 CEG Training Center in the southern area of the Base, such as backhoe trenching, crater repairs on the runway, and RADR, would be between 2 and 4 feet. The Proposed Action would have no effect on groundwater; therefore, this resource does not warrant further consideration and is excluded from further discussion.

### 3.1.3 Floodplains

Based on Federal Emergency Management Agency data, there are designated floodplains on Dobbins ARB. Small areas of floodplains are associated with Rottenwood Creek in North Base and in the main Base. The largest floodplain on Dobbins ARB is associated with Poorhouse Creek in the southern part of the Base (Dobbins ARB, 2018). The 622 CEG Headquarters building, LRS warehouse, and Fitness Center sites are not located within or adjacent to designated floodplains. A 100-year floodplain and a 500-year floodplain exist between the western and eastern portions of the 622 CEG Training Center site (Figure 3-1) and would be avoided during construction, operation, and training activities. The Proposed Action would have no effect on or from floodplains because none of the proposed projects are sited in a floodplain. Therefore, this resource does not warrant further consideration and is excluded from further discussion.



**Legend**

- |                          |         |                               |
|--------------------------|---------|-------------------------------|
| Dobbins Air Reserve Base | Stream  | Demolished Building           |
| Proposed Project Area    | Pond    | PFAS No Soil Disturbance Area |
| 100-year Floodplain      | Wetland |                               |
| 500-year Floodplain      |         |                               |

Basemap Source: Esri World Imagery, Maxar, 10/4/2020

**Figure 3-1**  
**Water Resources**  
**Proposed Project Area (Approximate)**  
**622 CEG Training Center**  
 Dobbins Air Reserve Base, Georgia

### **3.1.4 Environmental Justice and Protection of Children**

Dobbins ARB does not have a disproportionately high population of economically disadvantaged persons or concentrations of minority populations and the Proposed Action does not include a residential component; therefore, no dependent children under the age of 18 would reside within or adjacent to the proposed project areas. Construction sites would be surrounded by security fence, with site access restricted. While there are communities with high minority and low-income populations within a 1-mile radius of Dobbins ARB (EPA, 2021a), the Proposed Action would not impact off-base communities. No disproportionate effects on environmental justice, low-income populations, or the environmental health and safety of children would result from the Proposed Action; therefore, these resources are dismissed from further discussion.

### **3.1.5 Demographics and Housing**

The Proposed Action does not include changes to the number of staff employed on Dobbins ARB and does not involve on-post housing or lodging. The Proposed Action would have no impact on demographics or housing; therefore, these resources do not warrant further consideration and are excluded from further discussion.

### **3.1.6 Cultural Resources**

According to Dobbins ARB's Integrated Cultural Resources Management Plan (Dobbins ARB, 2017), approximately 1,600 acres within Dobbins ARB has been surveyed previously for cultural resources, including the locations selected under Alternative 1.

No previously recorded or known archaeological or architectural resources have been identified within the Proposed Action boundaries. The closest resource to the Proposed Action's boundaries is Building 510, which is listed in the National Register of Historic Places and located approximately 150 feet northwest of the proposed driveway for the 94 LRS warehouse. No indirect impacts would occur to Building 510 from the Proposed Action because the proposed new facilities would be visually consistent with other nearby buildings, structures, and land uses at the Base. The area surrounding Building 510 consists of modern facilities; therefore, the Proposed Action would not modify or diminish Building 510's historic integrity aspects of location, design, feeling, setting, materials, workmanship, or association. No other cultural resources outside of the Preferred Alternative location have the potential to be impacted.

No Traditional Cultural Properties, sacred sites, or sites of religious or cultural importance have been identified within the boundaries of the Proposed Action or its environs.

The Georgia Department of Natural Resources Historic Preservation Division and five federally recognized tribes that have ancestral ties to lands in Cobb County were consulted regarding potential cultural resources that could be affected by the Proposed Action. These tribes include Alabama-Quassarte Tribal Town, Catawba Indian Nation, Cherokee Nation, Eastern Band of Cherokee Indians, and Poarch Band of Creek Indians. Copies of correspondence are included in Appendix A.

The Proposed Action would not directly or indirectly alter, modify, or impact any resources listed in, or determined to be eligible for listing in, the National Register of Historic Places, or any other significant cultural resources. As a result, this resource area is excluded from further discussion.

### **3.1.7 Aesthetics and Visual Resources**

The Proposed Action would have insignificant impacts on aesthetics and visual resources. The Proposed Action would not result in any obvious modifications to the existing aesthetic and visual landscape at Dobbins ARB. The visual appearance of the new facilities would be consistent with the developed areas in the vicinity of the site. Therefore, this resource does not warrant further consideration and is excluded from further discussion.

### 3.1.8 Airspace

The implementation of the Proposed Action would not result in additional aircraft, aircraft operations, or requirements for changes in airspace use at Dobbins ARB. As a result, there would be no impact on airspace and this resource is excluded from further discussion.

## 3.2 Resources Considered in Detail

Detailed analysis has been conducted on the following resource areas to document the potential impacts from the Proposed Action.

### 3.2.1 Geology and Soils

#### 3.2.1.1 Affected Environment

##### Geology

The topography of Dobbins ARB is gently rolling and gradually slopes downward to the southeast. Ground surface elevations at the Base range from approximately 1,100 feet above mean sea level in the northwest corner of the Base to 950 feet above mean sea level in the southwest corner (Parsons, 1995).

Dobbins ARB is located within the Central Uplands district of the Piedmont physiographic province (USGS, 1997). Bedrock underlying Dobbins ARB consists of the New Georgia Group, which is overlain by the Sandy Springs Group (AFCEC, 2018). These two rock units are metamorphic and igneous in composition and are overlain by unconsolidated soils of varying thickness. The New Georgia Group consists of amphibolites, hornblend gneiss, and magnetite quartz, with minor schists. Overlying the New Georgia Group, the Sandy Springs Group consists of the Powers Ferry Formation (interbedded gneisses, schists, and amphibolites), the Chattahoochee Palisades Quartzite, and the Factory Shoals Formation (interbedded metagraywacky and kyanite quartz schist) (Parsons, 1995).

Soils overlying the bedrock are present in thicknesses between 0 foot (outcroppings present) to over 100 feet bgs across the Base and were derived in-place from the weathering of the underlying metamorphic and igneous rocks (Parsons, 1995).

##### Soils

Soil types affected by construction at each proposed project site are described in Table 3-2.

**Table 3-2. Affected Soil Types**

*Environmental Assessment for Construction Projects at Dobbins ARB, Georgia*

Project	Soil Type(s)	Acres	Percent of Project Area
Fitness Center	Madison and Pacolet, 15 to 25 percent slopes	2.0	33.3%
	Madison sandy loam, 2 to 6 percent slopes	2.0	33.3%
	Louisa gravelly sandy loam, 10 to 25 percent slopes	2.0	33.3%
622 CEG Headquarters Building	Madison and Pacolet, 15 to 25 percent slopes	0.2	10%
	Madison and Pacolet, 10 to 15 percent slopes	1.2	60%
	Cecil sandy loam, 2 to 6 percent slopes	0.6	30%
94 LRS Warehouse	Madison and Pacolet, 15 to 25 percent slopes	2.0	50%
	Urban Land	2.0	50%
622 Training Center	Appling sandy loam, 6 to 10 percent slopes	2.0	4%
	Appling sandy clay loam, 6 to 10 percent slopes	2.9	6%
	Urban land and borrow pits	19.6	40%
	Urban land	24.5	50%

Source: NRCS, 2021

Soils occurring within the Proposed Action boundary, with the exception of Urban Land series soils, are indicated as being residuum of weathered metamorphic or igneous parent rocks (mica schist or gneiss, respectively, where specified). Each soil, except for Urban Land, is characterized as having a water table depth greater than 6 feet bgs.

Appling series soils are well-drained and have moderate permeability. This series of soils has a low susceptibility to erosion and has a low slope stability due to excess fines and high clay content (NRCS, 1996).

Cecil sandy loam soils are well-drained and have moderately high to high permeability. This series of soils has low susceptibility to erosion and has low slope stability due to excess fines and high clay content (NRCS, 1996).

Louisa gravelly sandy loam soils are somewhat excessively drained and have a very low to moderately low permeability. This series of soils has moderately susceptible to erosion and has low slope stability due to a potential shallow depth to bedrock (NRCS, 1996).

Madison and Pacolet series soils are well-drained and have moderately high to high permeability. Both Madison and Pacolet series soils are slightly to moderately susceptible to erosion and have low slope stability due to excess fines and high clay content (NRCS, 1996).

Urban land series soils have been disturbed by development. These soils are listed as having a shallow (10 to 79 inches) depth to bedrock.

### **3.2.1.2 Environmental Consequences**

#### **Alternative 1 – New Construction (Preferred Alternative)**

##### ***Geology***

Alternative 1 would have no significant or adverse impacts on geologic resources or topographic conditions.

##### **Soils**

An estimated 61 acres of total ground disturbance would be expected under Alternative 1 (6 acres for the Fitness Center, 2 acres for the 622 CEG Headquarters building, 4 acres for the 94 LRS warehouse, and 49 acres for the 622 CEG Training Center). Site preparation and construction would result in minor, long-term, adverse impacts to soils. Adverse impacts to soils could include compaction from heavy equipment, construction of impervious surfaces, and erosion and disturbance of soils during earth-moving activities. Disturbed areas would be kept to the minimum required to complete the work and would be confined within site boundaries.

The construction contractor would be required to develop and implement effective sedimentation and erosion control procedures and best management practices (BMPs) to be used during construction to minimize erosion of surrounding soils due to soil/ground disturbance in accordance with the Georgia Erosion and Sedimentation Control Act. Project BMPs are outlined in the Manual for Erosion and Sediment Control in Georgia (GSWCC, 2016). See Section 3.2.2.2 for additional information specific to erosion as it relates to stormwater management.

Earth-moving training at the 622 CEG Training Center would require long-term operation of heavy equipment within a continuously disturbed area. The 622 CEG would construct and maintain a sedimentation pond within the earth-moving training area to prevent soils from washing outside the designated training area. Therefore, no impacts to soils from earth-moving training activities would be expected.

Stormwater runoff resulting from increased impervious surface area also could contribute to limited soil erosion. Site-specific measures would minimize the transport of soils. The stormwater collection systems

for the proposed facilities would be connected to the installation's existing stormwater program. Negligible impacts to soils would be expected from increased impervious area.

### **No Action Alternative**

Under the No Action Alternative, no new construction would occur, and existing conditions would continue. There would be no impacts to geology, topography, or soils from the No Action Alternative.

### **3.2.2 Water Resources**

#### **3.2.2.1 Affected Environment**

##### **Surface Water**

Dobbins ARB is in the Upper Chattahoochee watershed. Surface waters on the Base include two built ponds (Big Lake and Little Lake), five spill retention ponds, three stormwater/sediment detention basins, Poorhouse Creek, and several unnamed tributaries to Poorhouse or Rottenwood Creeks. Twenty-eight perennial, intermittent, or ephemeral tributaries have been identified on Dobbins ARB that total approximately 34,600 linear feet of streams (Dobbins ARB, 2018).

The nearest surface water feature to the 622 CEG Headquarters building is a stream that is 147 feet north-northwest of the site. In the vicinity of the 622 CEG Training Center, streams are in the forested areas east and west of the old runway, as shown on Figure 3-1. At the nearest distance, the project area for the 622 CEG Training Center is 33 feet south of the stream designated as S-4a, 38 feet north of the stream designated as S-4, and 150 feet east of the stream designated as S-3. The 94 LRS warehouse site is located 30 feet north of a stream that is south of Atlantic Ave SE and connects to Big Lake. Big Lake is approximately 850 feet southeast of the 94 LRS warehouse site. The nearest surface water to the Fitness Center site is a stream approximately 180 feet southeast of the site.

##### **Stormwater**

In addition to the basins and ponds, stormwater at the Base is collected by a system of storm sewers and ditches and exits the boundaries of the Base through outfalls. Nine industrial outfalls have been identified at Dobbins ARB. All surface water ultimately drains from Dobbins ARB into an unnamed tributary to either Rottenwood Creek or Poorhouse Creek, and then to the Chattahoochee River southeast of Dobbins ARB. Rottenwood Creek is listed as impaired for biota (macroinvertebrate community) on the 2018 Georgia Environmental Protection Division (EPD) Section 303(d) List of Impaired Waters. The Georgia EPD administers the National Pollutant Discharge Elimination System (NPDES) program and is responsible for administering the state stormwater program. Dobbins ARB is operating under the NPDES Multi-Sector General Permit (MSGP) for Storm Water Discharges Associated with Industrial Activity (Permit No. GAR050000) (Dobbins ARB, 2020a).

##### **Wetlands**

Twenty-two wetlands, totaling 14.5 acres, were delineated on Dobbins ARB in 2009. An additional 8.1 acres of open water were delineated in the two ponds (Dobbins ARB, 2018).

A palustrine forested wetland is approximately 225 feet north-northeast of the 622 CEG Headquarters building site and 113 feet southeast of the Fitness Center site. Delineated wetlands are located in the vicinity of the 622 CEG Training Center, as shown on Figure 3-1. The nearest wetland to the Training Center is a palustrine forested wetland designated as W-104 that is 37 feet north of the site. Palustrine forested wetlands associated with Big Lake are located approximately 550 feet southeast of the LRS warehouse site.

### 3.2.2.2 Environmental Consequences

#### Alternative 1 – New Construction (Preferred Alternative)

##### *Surface Water and Stormwater*

During construction activities, adverse impacts to surface water quality could occur as a result of spills or sedimentation. The risk from spills would be minimized to negligible by practicing good housekeeping, such as properly fueling; properly storing and handling materials and wastes; and maintaining construction equipment offsite or in designated areas with appropriate control and containment. All spills would be addressed in accordance with the Dobbins ARB Spill Prevention, Control, and Countermeasure Plan. This plan includes federal and state environmental regulatory requirements related to spill emergency response procedures.

Construction of the proposed projects would be subject to the requirements of the NPDES MSGP. Because all proposed projects would disturb more than 1 acre, they would also be required to obtain coverage under the Georgia NPDES General Permits for Storm Water Discharges Associated with Construction Activities (Permit No. GAR100001 for Stand Alone Construction Projects). These permits require the development of a site-specific Erosion and Sedimentation Plan. The project is also subject to the terms and conditions of Dobbins GAR050000 NPDES Permit "Storm Water Discharges Associated with Industrial Activity," which prohibits illicit discharges (soaps, oils, fuels, and sediment) from entering storm drains. Project-specific design measures and effective post-construction BMPs would be implemented to minimize sedimentation and erosion, as outlined in the Manual for Erosion and Sediment Control in Georgia (GSWCC, 2016). BMPs from the Dobbins ARB Storm Water Pollution Prevention Plan would be implemented to prevent potential stormwater pollution. Soaps, oils, fuels, and soils from construction sites could contaminate stormwater. Appropriate BMPs would be selected based on site-specific conditions and could include, but would not be limited to, the following:

- Preserving natural vegetation.
- Using buffer zones of vegetation around exposed areas.
- Using mulch, matting, and netting where immediate erosion control is needed.
- Temporary seeding and planting of disturbed areas and soil piles.
- Using silt fence, straw bales, or brush barriers for sediment control.
- Protecting storm inlets and drains.

With the use of BMPs, Alternative 1 would have negligible, short-term impacts on surface water and stormwater during construction activities.

The Proposed Action would have minor, long-term impacts on the stormwater systems as a result of a net increase in impervious surfaces. The addition of impervious surfaces through the construction of new buildings and parking lots would result in an increase in stormwater. Potential impacts on the quality of surface water resources could occur as the result of increased stormwater runoff. The design of buildings and parking lots would include stormwater controls, such as detention areas and infiltration areas, designed to minimize or eliminate the impacts of increased runoff.

As required by their NPDES MSGP, Dobbins ARB performs quarterly visual monitoring of stormwater discharges from Outfalls 001 through 009, benchmark monitoring, and sampling of stormwater discharges from Outfalls 001, 003, 004, and 005 that drain to Rottenwood Creek for total suspended solids (TSS) (Dobbins ARB, 2020a). To ensure construction activities and new developments are not further contributing to the impairment of Rottenwood Creek, BMPs and stormwater controls would be modified as necessary if indicators of stormwater pollution, including elevated levels of TSS, were detected during outfall monitoring.

Ground-disturbing activities and an increase of impervious surfaces have the potential to indirectly impact surface water resources; however, BMPs and stormwater controls will be implemented to reduce impacts to water resources. Alternative 1 would not encroach upon any surface waters but would result in an increase in impervious areas that would add to indirect impacts from other projects. Appropriate BMPs would be implemented to prevent sedimentation and stormwater runoff. Post-construction stormwater

controls would be implemented to minimize or eliminate the impacts of increased runoff. With the implementation of BMPs and stormwater controls, no significant indirect impacts to surface water or stormwater resources would be expected.

The proposed project areas for the 622 CEG Headquarters building and Training Center, LRS warehouse, and Fitness Center are more than 25 feet from the banks of streams. No construction, operation, or training activities would occur within 25 feet of streams; therefore, no impacts to the streams would occur and CWA Section 404 permitting would not be required.

Earth-moving activities associated with the 622 CEG Training Center would result in localized erosion and sedimentation and affect surface water quality. To avoid this, the earth-moving training area would include a sedimentation pond to capture sediment-laden runoff and meet CWA requirements. Therefore, no impacts to surface water quality from earth-moving training activities would be expected.

### **Wetlands**

All wetlands would be avoided during construction, operation, and training activities. The proposed project areas for the 622 CEG Headquarters building and Training Center, LRS warehouse, and Fitness Center are located more than 25 feet from delineated wetlands. BMPs specifically designed to mitigate impacts to wetlands from the EPA's *Protecting Natural Wetlands: A Guide to Stormwater Best Management Practices* (EPA, 1996) would be selected based on site-specific conditions and could include, but would not be limited to, the following:

- Infiltration basins and/or trenches
- Grassed swales
- Level spreaders
- Vegetated filter strips
- Vegetated natural buffers
- French drains
- Detention basins

These BMPs would be designed to complement BMPs established for stormwater pollution prevention. With avoidance and implementation of BMPs, no impacts to wetlands would be expected and CWA Section 404 permitting would not be required.

### **No Action Alternative**

Under the No Action Alternative, no new construction would occur and existing conditions would continue. There would be no impacts to water resources from the No Action Alternative.

### **3.2.3 Air Quality**

#### **3.2.3.1 Affected Environment**

Under the authority of the CAA, the U.S. Environmental Protection Agency (EPA) established nationwide air quality standards to protect public health and welfare. These federal standards, known as National Ambient Air Quality Standards (NAAQS), represent the maximum allowable atmospheric concentrations for six criteria pollutants: ozone (O<sub>3</sub>), nitrogen dioxide (NO<sub>2</sub>), carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), lead, and particulate matter, which includes respirable particulate matter less than or equal to 10 micrometers in diameter (PM<sub>10</sub>) and respirable particulate matter less than or equal to 2.5 micrometers in diameter (PM<sub>2.5</sub>). The criteria pollutants are shown in Table 3-3.

**Table 3-3. Ambient Air Quality Standards**

*Environmental Assessment for Construction Projects at Dobbins ARB, Georgia*

Criteria Pollutant	Federal Standard (Averaging Period) <sup>a</sup>	Federal Attainment Status
CO	35 ppm (1 hour)	Attainment
	9 ppm (8 hours)	
NO <sub>2</sub>	0.100 ppm (1 hour)	Attainment
	0.053 ppm (annual arithmetic mean)	
Ozone	0.070 ppm (8 hours)	Nonattainment
PM <sub>2.5</sub>	12 µg/m <sup>3</sup> (annual arithmetic mean)	Attainment
	35 µg/m <sup>3</sup> (24 hours)	
PM <sub>10</sub>	150 µg/m <sup>3</sup> (24 hours)	Attainment
SO <sub>2</sub>	0.5 ppm (3 hours, secondary standard)	Attainment
	0.075 ppm (1 hour)	Attainment
Lead	0.15 µg/m <sup>3</sup> (rolling 3-month average)	Attainment

Source: EPA, 2021b

<sup>a</sup> National standards other than ozone, particulate matter, and those based on annual averages or annual arithmetic means are not to be exceeded more than once a year. The ozone standard is attained when the fourth-highest 8-hour concentration in a year, averaged over 3 years, is equal to or less than the standard. For PM<sub>10</sub>, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m<sup>3</sup> is equal to or less than 1. For PM<sub>2.5</sub>, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over 3 years, is equal to or less than the standard.

µg/m<sup>3</sup> = microgram(s) per cubic meter  
ppm = part(s) per million, by volume

Under the CAA, the country is classified into attainment, nonattainment, and maintenance areas. Any area not meeting the NAAQS is designated as nonattainment for the specific pollutant or pollutants, whereas areas that meet the NAAQS are designated as attainment areas. Maintenance areas are those areas that were previously designated as nonattainment and subsequently re-designated to attainment, subject to the development of a maintenance plan.

Under the EPA New Source Review (NSR) program, stationary sources of air pollution are required to have permits before construction of the source begins. Approval of the NSR Prevention of Significant Deterioration permit would be required if the proposed project were either a new source, with the potential to emit 250 tons or more per year of an attainment pollutant, or an existing major source of emissions, making a major modification in an attainment area and resulting in a net emissions increase above specified levels. Nonattainment NSR approval would be required if the proposed project were a new stationary source or major source of emissions, making a major modification in a nonattainment area with the potential to emit nonattainment pollutants in excess of the NSR thresholds.

The CAA General Conformity Rule (40 CFR Parts 6, 51, and 93) requires federal agencies to make written conformity determinations for federal actions in or affecting nonattainment or maintenance areas. If the emissions of a criteria pollutant or its precursors do not exceed the *de minimis* level, the federal action has minimal air quality impact and, therefore, the action is determined to conform for the pollutant under study and no further analysis is necessary.

Greenhouse gases (GHGs) are compounds that may contribute to accelerated climate change by altering the thermodynamic properties of the Earth's atmosphere. GHGs consist of CO<sub>2</sub>, methane, nitrous oxide, hydrofluorocarbons, and perfluorocarbons (EPA, 2021c). Under the EPA Mandatory Reporting Rule, facilities that emit 25,000 metric tons or more per year of carbon dioxide equivalent (CO<sub>2</sub>e) emissions must submit annual reports to the EPA. For purposes of the NEPA analysis, the USAF has established a *de minimis* significance threshold of 75,000 tons per year CO<sub>2</sub>e (AFCEC, 2016).

**Criteria Pollutants.** Dobbins ARB is in Cobb County, Georgia. Cobb County is in nonattainment for the 2015 8-hour ozone NAAQS. Cobb County is also in maintenance areas for the 2008 8-hour ozone and

revoked 1979 1-hour ozone, 1997 8-hour ozone, and 1997 annual PM<sub>2.5</sub> NAAQS. Cobb County is in attainment with all other NAAQS.

**Climate Conditions and Trends.** For Atlanta, Georgia, which is the closest city to Dobbins ARB with recent data, the average high temperature is 87 degrees Fahrenheit (°F) in June, which is the hottest month, and the average low temperature is 35°F in December, which is the coldest month. Atlanta has average annual precipitation of 47.12 inches per year. The wettest month of the year is November, with an average rainfall of 5.35 inches (U.S. Climate Data, 2021).

Annual average temperatures are projected to rise by as much as approximately 7°F by 2050 and 13°F by 2100. Overall, rising temperatures will lead to more intense heat waves but decreased cold wave intensity. Since 2000, Georgia has generally experienced below average precipitation, including one of the worst droughts in Georgia's history in 2007. While precipitation projections are inconclusive, droughts are expected to become more intense because of increased evaporation rates from higher temperatures (Frankson et al., 2017).

### 3.2.3.2 Environmental Consequences

#### Alternative 1 – New Construction (Preferred Alternative)

**Criteria Pollutants.** Air quality impacts associated with Alternative 1 were evaluated based on whether emissions would be localized and whether a reasonable potential exists for a violation of an ambient air quality standard or regulatory threshold.

The implementation of Alternative 1 at Dobbins ARB would result in minor, short-term, direct, adverse impacts on overall air quality from construction activities. The operation of various equipment during construction activities would create exhaust emissions and generate dust and other particles in the air during the execution of the Preferred Alternative. Mobile source emissions also would be generated from vehicular traffic.

Construction and operational emissions were estimated using the USAF's Air Conformity Applicability Model (Version 5.0.17b). Construction activities include construction projects described in Section 2.1. Table 3-4 summarizes projected air emissions from construction activities under Alternative 1 and operational activities at the 622 CEG Training Center. A copy of the calculations used to develop these estimates is provided in Appendix C.

**Table 3-4. Alternative 1 Construction Emissions**

*Environmental Assessment for Construction Projects at Dobbins ARB, Georgia*

Emission Source	Emissions for 2021 (tons per year)					
	VOC	CO	NO <sub>x</sub>	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Construction Emissions	0.080	0.485	0.515	0.001	1.76	0.022
<b>Total Emissions</b>	<b>0.080</b>	<b>0.485</b>	<b>0.515</b>	<b>0.001</b>	<b>1.76</b>	<b>0.022</b>
<i>de minimis</i> levels (tons per year) <sup>a</sup>	100	--	100	--	--	--
Insignificance Indicator (tons per year)	--	250	--	250	250	250
Threshold Exceeded for Any Activity?	No	No	No	No	No	No
Emission Source	Emissions for 2022 (tons per year)					
	VOC	CO	NO <sub>x</sub>	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Construction Emissions	0.564	1.24	1.12	0.003	0.052	0.052
Operational Emissions <sup>b</sup>	0.0751	0.643	0.233	0.000332	0.0117	0.0117
<b>Total Emissions</b>	<b>0.639</b>	<b>1.89</b>	<b>1.35</b>	<b>0.00333</b>	<b>0.0637</b>	<b>0.0637</b>
<i>de minimis</i> levels (tons per year) <sup>a</sup>	100		100			
Insignificance Indicator (tons per year)	--	250	--	250	250	250
Thresholds Exceeded for Any Activity?	No	No	No	No	No	No

**Table 3-4. Alternative 1 Construction Emissions**

*Environmental Assessment for Construction Projects at Dobbins ARB, Georgia*

Emission Source	Emissions for 2023 (tons per year)					
	VOC	CO	NO <sub>x</sub>	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Operational Emissions	0.301	2.57	0.936	0.002	0.048	0.047
<b>Total Emissions</b>	<b>0.301</b>	<b>2.57</b>	<b>0.936</b>	<b>0.002</b>	<b>0.048</b>	<b>0.047</b>
<i>de minimis</i> levels (tons per year) <sup>a</sup>	100		100			
Insignificance Indicator (tons per year)	--	250	--	250	250	250
Thresholds Exceeded for Any Activity?	No	No	No	No	No	No
Emission Source	Emissions for 2024 (tons per year)					
	VOC	CO	NO <sub>x</sub>	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Construction Emissions	0.095	0.614	0.551	0.002	5.22	0.0210
Operational Emissions	0.301	2.57	0.936	0.002	0.048	0.047
<b>Total Emissions</b>	<b>0.396</b>	<b>3.19</b>	<b>1.49</b>	<b>0.00433</b>	<b>5.27</b>	<b>0.0680</b>
<i>de minimis</i> levels (tons per year) <sup>a</sup>	100		100			
Insignificance Indicator (tons per year)	--	250	--	250	250	250
Thresholds Exceeded for Any Activity?	No	No	No	No	No	No
Emission Source	Emissions for 2025 (tons per year)					
	VOC	CO	NO <sub>x</sub>	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Construction Emissions	0.833	1.41	1.05	0.003	0.039	0.038
Operational Emissions	0.301	2.57	0.936	0.002	0.048	0.047
<b>Total Emissions</b>	<b>1.13</b>	<b>3.99</b>	<b>1.99</b>	<b>0.00533</b>	<b>0.0870</b>	<b>0.0850</b>
<i>de minimis</i> levels (tons per year) <sup>a</sup>	100		100			
Insignificance Indicator (tons per year)	--	250	--	250	250	250
Thresholds Exceeded for Any Activity?	No	No	No	No	No	No
Emission Source	Emissions for 2026 (tons per year)					
	VOC	CO	NO <sub>x</sub>	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Construction Emissions	0.091	0.608	0.507	0.002	7.82	0.019
Operational Emissions	0.301	2.57	0.936	0.002	0.048	0.047
<b>Total Emissions</b>	<b>0.392</b>	<b>3.18</b>	<b>1.44</b>	<b>0.00433</b>	<b>7.87</b>	<b>0.0660</b>
<i>de minimis</i> levels (tons per year) <sup>a</sup>	100		100			
Insignificance Indicator (tons per year)	--	250	--	250	250	250
Thresholds Exceeded for Any Activity?	No	No	No	No	No	No
Emission Source	Emissions for 2027 (tons per year)					
	VOC	CO	NO <sub>x</sub>	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Construction Emissions	0.626	1.55	1.15	0.003	2.64	0.044
Operational Emissions	0.301	2.57	0.936	0.002	0.048	0.047
<b>Total Emissions</b>	<b>0.927</b>	<b>4.13</b>	<b>2.09</b>	<b>0.00533</b>	<b>2.69</b>	<b>0.0910</b>
<i>de minimis</i> levels (tons per year) <sup>a</sup>	100		100			
Insignificance Indicator (tons per year)	--	250	--	250	250	250
Thresholds Exceeded for Any Activity?	No	No	No	No	No	No

Source: Record of Conformity Analysis (Appendix C)

<sup>a</sup> *de minimis* levels are based on 40 CFR Section 93.153.

<sup>b</sup> Partial year of operational emissions; operational emissions are anticipated to begin October 2022.

The USAF's Air Quality Environmental Impact Analysis Process Guide, Volume II (USAF, 2020) provides guidance on using 250 tons per year as an insignificance indicator in areas that are definitely in attainment of the NAAQS for criteria pollutants. For the Preferred Alternative, 250 tons per year is used as the insignificance indicator for CO, SO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions because Cobb County is in attainment with these NAAQS. However, since Cobb County is in nonattainment with the ozone NAAQS, the *de minimis* levels established in 40 CFR Section 93.153 are used to determine significance for volatile organic compound (VOC) and nitrogen oxides emissions.

Based on the estimated emissions listed in Table 3-4, the emissions from construction and operational activities associated with the Preferred Alternative would be well below federal regulatory thresholds for ozone precursors VOC and nitrogen oxides and the USAF's insignificance indicator for all other criteria pollutants. Therefore, Alternative 1 would not be subject to Prevention of Significant Deterioration or NSR requirements. The analysis indicates that the emissions would be below the *de minimis* thresholds under EPA's General Conformity Rules. A Record of Conformity Analysis would be used to document that the proposed project is exempt from general conformity requirements. Appendix C contains the Record of Conformity Analysis and detailed emission calculations.

BMPs would be implemented during construction to reduce potential impacts on air quality, including having no visible emissions such as dust and wind-blown soil. These control measures could include applying water to, or using other stabilization measures on, areas of bare soil or soil piles; creating wind breaks; and covering dump trucks that transport materials that could become airborne. Additionally, contractors would be required to maintain construction equipment in accordance with manufacturers' specifications to reduce exhaust emissions. The Preferred Alternative would have no significant impact on air quality.

**Climate Change and GHGs.** Alternative 1 would generate GHG emissions from construction- and operation-related activities. Construction of the proposed new facilities would result in a short-term, insignificant increase in GHG emissions. Estimated peak GHG emissions resulting from Alternative 1 would be 343 tons CO<sub>2e</sub> for construction in 2027 and 468 tons CO<sub>2e</sub> per year for operational activities, which are well below the USAF *de minimis* threshold of 75,000 tons per year (AFCEC, 2016). Therefore, negligible, long-term, adverse impacts on climate change as a result of operations-related GHG emissions at Dobbins ARB would be expected from the implementation of Alternative 1. No indirect impacts would be anticipated.

The changing climate is not anticipated to impact future operations at the new facilities or cause an increase in the impacts associated with Alternative 1. Dobbins ARB is not located in a coastal region or along a tidally influenced river reach. Therefore, sea level rise from climate change would not impact the Preferred Alternative. The Preferred Alternative would have no significant impact on climate change.

Air quality impacts associated with other recently completed, ongoing, or planned projects would add indirectly to adverse air quality impacts from Alternative 1. Impacts would be minor and temporary. There also would be minor, short-term, indirect, localized increases in combustion engine emissions from equipment operation during construction and demolition, but these would not be expected to result in exceedances of air quality standards and would not result in significant indirect impacts to air quality.

### **No Action Alternative**

Implementation of the No Action Alternative would not result in a change in current conditions. There would be no emissions from construction activities or the operation of the new facilities and no increase in fugitive dust emissions. Furthermore, no impacts to climate change would occur. Therefore, no impacts to air quality would occur.

#### **3.2.4 Noise**

Noise is defined as unwanted or annoying sound that interferes with or disrupts normal human activities such as sleep, conversation, or student learning. Noise measurements are normally considered when determining noise impacts and include the following:

- **Decibel (dB):** A measurement of the sound pressure level.
- **A-weighted sound pressure level (dBA):** Sound pressure level adjusted by an A-weighting filter. The A-weighting filter places greater emphasis on those frequencies within the sensitive range of the human ear by de-emphasizing the very low and very high frequency components. Typically, human hearing is best approximated by using a dBA scale (EPA, 1974).
- **C-weighted sound pressure level:** Sound pressure level adjusted by a C-weighting filter, which emphasizes the very low frequency components of sound.
- **Day-night average sound level (DNL):** Total accumulation of all sound energy but spread out uniformly over a 24-hour period.

The decibel scale is logarithmic instead of arithmetic. When sound pressure doubles, the sound pressure level, as expressed by dBA, increases by 3. Most humans do not perceive a doubling of sound until there is an increase of 10 dBA (EPA, 1974). Sound pressure decreases with distance from the source. There is a reduction of 6 dBA for every doubling of distance from the noise source. However, other factors, including ground type, atmospheric conditions, and shielding by vegetation and structures further affect the amount of decrease in sound over distance (USDOT, 2011).

The Federal Aviation Administration and U.S. Department of Housing and Urban Development criteria specify that noise levels in noise-sensitive land use areas are normally considered unacceptable if they exceed a DNL of 65 dBA.

#### **3.2.4.1 Affected Environment**

Noise sources at Dobbins ARB include aircraft operations and maintenance, the Explosive Ordnance Disposal Range, shop activities, traffic, and occasional construction (AFRC, 2011, 2020). The 2011 DNL noise zones for Dobbins ARB, which are framed by noise contours, extend along the runway centerline to the east and west and follow the same general path as the flight tracks.

Portions of the 94 LRS warehouse and 622 CEG Training Center sites are within the 65 to 69 dBA DNL noise zone. The 622 CEG Headquarters building and Fitness Center sites are outside the 2011 DNL noise zones (AFRC, 2011).

The nearest sensitive noise receptor to the proposed project sites is a restaurant with outdoor dining approximately 850 feet northeast of the Fitness Center. Other noise-sensitive locations, including campgrounds/RV parks, hotels, and residential housing, are more than 1,100 feet from the proposed project sites.

#### **3.2.4.2 Environmental Consequences**

##### **Alternative 1 – New Construction (Preferred Alternative)**

Alternative 1 would result in minor, short-term noise impacts from construction activities. During construction, noise would typically be above background levels, except during aircraft flyovers. Heavy equipment, such as bulldozers, graders, backhoes, excavators, dump trucks, pavers, jackhammers, and cement trucks, would generate noise that could affect onsite workers. Construction equipment typically emits noise in the 75- to 89-dBA range at a distance of 50 feet. If multiple pieces of construction equipment are operating simultaneously, then the noise is increased due to the additional equipment. Therefore, noise from the construction site could be up to 94 dBA at 50 feet with several large pieces of equipment operating at the same time. There is a reduction of 6 dBA for every doubling of distance from the noise source (Table 3-5). Construction workers would use hearing protection and follow Occupational Safety and Health Administration (OSHA) standards and procedures to protect themselves from construction noise and/or noise generated by surrounding training activities.

**Table 3-5. Noise Levels of Construction Equipment at 50 and 850 Feet**  
*Environmental Assessment for Construction Projects at Dobbins ARB, Georgia*

Equipment	Noise Level at 50 Feet (dBA)	Noise Level at 850 Feet (dBA)
<b>Earthmovers</b>		
Front Loaders	79	55
Backhoes	78	54
Dozers	82	58
Tractors	84	60
Graders	85	61
Pavers	77	53
Trucks	75	51
<b>Materials Handling</b>		
Concrete Mixers	79	55
Concrete Pump	81	57
Crane	81	57
<b>Stationary</b>		
Pumps	81	57
Generator	81	57
Compressors	78	54
<b>Impact</b>		
Jack Hammers	89	65
Pneumatic Tools	85	61
<b>Other</b>		
Vibrators	87	63

Source: USDOT, 2006

Direct exposure of non-construction staff to construction-related noise could occur but would be temporary and limited to times when personnel are traveling between vehicles and buildings or among buildings. For personnel stationed outdoors near construction areas, the hearing risk would be analyzed and personnel would be provided with hearing protection if warranted by the exposure noise levels. Construction activities would be confined to daytime hours, further minimizing potential disturbance to sensitive residential areas at the most critical times (8 p.m. to 7 a.m.).

Most of the proposed project areas are not near sensitive noise receptors. The nearest sensitive noise receptor, a restaurant 850 feet northeast of the Fitness Center site, would experience construction noise levels at or below 65 dBA, which is about the same level as normal conversation. Therefore, only negligible, short-term, adverse impacts to sensitive noise receptors from construction would be expected.

Existing noise sources would not pose a noise risk to personnel stationed in or using the new facilities. The LRS warehouse and 622 CEG Training Center are within the 65 to 69 dBA DNL noise zone; however, because these are not noise-sensitive facilities, noise levels between 65 to 69 dBA would not interfere with normal activities associated with their use. Occupied buildings would provide a work environment free from excessive noise. Intermittent and temporary exposures to aircraft noise would occur as personnel move between vehicles and buildings or among buildings. Once construction is complete, operation of the occupied facilities would not generate appreciable noise and levels would be comparable to background levels in the area. No shifts in existing noise contours would occur.

Noise associated with construction during implementation of the proposed projects could contribute to short-term, indirect noise impacts from other projects that happen at the same time and in the same area. Multiple concurrent sources of periodic loud noises associated with construction could result in increased annoyance and disruption of outdoor activities compared to single sources. However, considering that construction of the Proposed Action projects may not occur simultaneously with construction of other ongoing projects and that not all projects are close enough for noise effects to combine, no significant indirect noise levels would be expected.

### **No Action Alternative**

Under the No Action Alternative, no new construction would occur and existing conditions would continue. There would be no impacts to noise resources from the No Action Alternative.

### **3.2.5 Biological Resources**

Biological resources consist of plants and animals and their habitats. These resources provide aesthetic, recreational, and socioeconomic benefits to society. This section describes the plant and animal species that occur, or are likely to occur, in the proposed project site.

#### **3.2.5.1 Affected Environment**

##### **Vegetation**

Approximately one-third of Dobbins ARB has impervious surfaces, while nearly half the Base is landscaped or maintained grasslands. The grasslands are found primarily around the airfield. The landscaped areas are dominated by a variety of herbaceous and woody shrubs and trees, mostly planted during the 1980s, and includes some invasive plants. Only 480 acres are forested with natural vegetation, though there are some non-native plants present. The forest communities documented on Dobbins ARB include pine and pine-hardwood, oak-hickory, mixed hardwood, and Piedmont bottomland. Pine and pine-hardwood forests are most common, occurring on 380 of the 480 acres of forest (Dobbins ARB, 2018).

##### ***622 CEG Headquarters Building and Training Center***

The 622 CEG Headquarters building site comprises Piedmont loblolly pine-oak forest, with areas of maintained grass adjacent to the road and nearby buildings. The forest stand (DN-1) is rated as low-quality habitat due to known forest pest Chinese privet growing in the understory and its close proximity to structures, private property, and public roadways (Dobbins ARB, 2018).

The Training Center site includes mostly developed land, with small areas of Piedmont loblolly pine-oak forest. The forest stand (DS-2) is rated as low-quality habitat and is composed of loblolly pine, tulip poplar, and mixed hardwood and shortleaf pine (Dobbins ARB, 2018).

##### ***94 LRS Warehouse***

The proposed LRS warehouse site comprises Piedmont loblolly pine-oak forest and maintained grass. The forest stand (DN-7) is rated as high-quality habitat and is in good health. Known forest pest, Kudzu (*Pueraria montana*), is present in this area (Dobbins ARB, 2018).

##### ***Fitness Center***

The proposed Fitness Center site comprises loblolly pine planted forest, except for the dirt and gravel area at the eastern end of the site. The forest stand (DN-3) is a 19-year-old naturally regenerated loblolly pine stand of medium habitat quality (Dobbins ARB, 2018).

##### **Wildlife**

The quantity of wildlife habitat available on Dobbins ARB is limited and surrounded by urban development, which limits the type and density of wildlife able to inhabit the installation. The primary

wildlife habitat is in the forested areas and water resources (Dobbins ARB, 2018). Common bird, mammal, reptile, amphibian, and fish species are found throughout the installation.

### **Special-Status Species**

Special-status species include those listed as threatened or endangered, proposed for listing, or candidate for listing under the ESA and state endangered, threatened, and species of special concern. The Nature Conservancy conducted an inventory of all threatened and endangered animal and plant species occurring at Dobbins ARB in 1993. This was updated with a survey of potential habitats for listed species on Dobbins ARB in 2007. No surveys have identified any federally or state-listed threatened, endangered, or candidate species at Dobbins ARB. One state-protected plant species, pink lady's slipper orchid (*Cypripedium acaule*), is known to occur in five populations on Dobbins ARB (Dobbins ARB, 2018).

The U.S. Fish and Wildlife Service Information, Planning, and Consultation Trust Resource Report prepared for the proposed projects indicates that the following two federally listed species have the potential to occur in the vicinity of the project areas: Michaux's sumac (*Rhus michauxii*) and white fringeless orchid (*Platanthera integrilabia*).

### **3.2.5.2 Environmental Consequences**

#### **Alternative 1 – New Construction (Preferred Alternative)**

##### ***Vegetation***

Under Alternative 1, there would be long-term, direct, adverse impacts on vegetation from the removal of approximately 6.3 total acres of forest for the construction of the new facilities. Areas of maintained grass would also be converted to developed areas. Given that only approximately 1.3 percent of forested land on Dobbins ARB would be removed, and that large areas of similar habitat would still remain adjacent to the project areas, impacts to vegetation would be minor.

##### ***Wildlife***

Alternative 1 would result in minor, short-term, direct, adverse impacts to wildlife due to disturbances from noise, construction activities, and heavy equipment use.

Habitat loss associated with the conversion of undeveloped land to developed impervious areas would result in long-term, direct, adverse impacts to wildlife. Impacts would be minor because of the large areas of similar quality habitat for displaced wildlife adjacent to the project areas.

During land clearing and grading of currently undeveloped sites, all vegetation would be removed from the areas and limited incidental animal injury or mortality could occur. However, it is expected that wildlife would leave the vicinity to avoid harm. No habitat would be lost outside the boundaries of the project areas. Incidental losses of animals during construction would not seriously affect regional animal population levels.

Ground-disturbing construction activities would not occur between 15 March and 30 September to the extent practicable to avoid impacts to nesting bird species that are protected by the MBTA. If construction must be scheduled when migratory birds are nesting, a site-specific survey for nesting migratory birds would be performed immediately prior to construction by a qualified biologist. If nesting birds are found during the survey, appropriately sized buffer areas would be established around the nests and construction would halt in the buffer areas until the birds have left the nest. Confirmation that all young have fledged would be made by a qualified biologist.

##### ***Special-status Species***

Habitat for Michaux's sumac occurs on Dobbins ARB; however, it is unlikely to occur given that there are only two known populations of this plant in Georgia and it has not been observed on Base during prior surveys. White fringeless orchid has not been observed on Dobbins ARB and has been determined

unlikely to occur on Base. The proposed project areas are not in the vicinity of documented pink lady's slipper populations (Dobbins ARB, 2018). No impacts to special-status species would be expected to occur under Alternative 1.

### **No Action Alternative**

Under the No Action Alternative, no new construction would occur and existing conditions would continue. There would be no impacts to biological resources from the No Action Alternative.

## **3.2.6 Socioeconomic Resources**

### **3.2.6.1 Affected Environment**

The Region of Influence (ROI) for the socioeconomics analysis includes the municipalities of Marietta and Smyrna, Georgia, as well as Cobb County. In 2019, Cobb County had an estimated population of 760,141 people, which was a 10.5 percent increase over 2010 levels. Marietta and Smyrna had estimated populations of 60,867 people and 56,666 people, respectively. Smyrna's population has grown at a slightly higher rate than Cobb County, with an increase of 11 percent since 2010, while Marietta's rate of growth was lower than the county at 7.8 percent (USCB, 2019).

Cobb County has a total of 304,819 housing units with a median home value of \$253,900, a median monthly rental rate of \$1,202, and a rental vacancy rate of 4 percent. Marietta has a total of 26,878 housing units and, compared with Cobb County, a higher median home value (\$287,600), a lower median rental rate (\$1,102), and a higher rental vacancy rate (7.7 percent). Smyrna has 26,579 housing units with a higher median home value than both Marietta and Cobb County (\$284,000), a median monthly rental rate that is higher than Marietta and Cobb County (\$1,248), and a rental vacancy rate that is higher than Marietta and lower than Cobb County (4.2%) (USCB, 2019).

The highest per capita income in the ROI is in Smyrna (\$46,681) and the lowest is in Marietta (\$35,598), with the Cobb County level (\$40,031) falling between the two cities. Median household incomes in the ROI are higher than the statewide level of \$58,700 in Cobb County (\$77,932) and Smyrna (\$76,444) but lower in Marietta (\$57,452) (USCB, 2019). The unemployment rate for Cobb County is 3.8 percent, which is lower than the statewide level of 4.8 percent (U.S. Bureau of Labor Statistics, 2021).

### **3.2.6.2 Environmental Consequences**

#### **Alternative 1 – New Construction (Preferred Alternative)**

Implementation Alternative 1 would have minor, short-term, direct, beneficial impacts to socioeconomics from construction. Impacts would be beneficial because local labor and materials would likely be used for the construction of the new facilities. These impacts would be short-term because of the limited duration of the construction activities and minor because the economic benefit of the construction jobs is small in relation to the economic activity in Cobb County. No new permanent jobs would be associated with these facilities. Existing personnel working on Dobbins ARB would transfer their duties to the new facilities, if appropriate. Alternative 1 would have no impact on housing on Dobbins ARB or the surrounding area. Trees removed during land clearing for new construction would be either sold or recycled. If timber is sold, Dobbins ARB would experience short-term economic gains. Alternative 1 would have no significant impact on socioeconomics.

Benefits to the local economy from Alternative 1 would add to indirect benefits from other recently completed, ongoing, or planned construction projects in the area. These projects create jobs and use materials from local vendors, both of which benefit the local economy.

### **No Action Alternative**

Under the No Action Alternative, no new construction would occur and existing conditions would continue. There would be no new construction jobs and local labor and materials would not be used. Therefore,

there would be no short-term beneficial impacts to socioeconomics in the area around Dobbins ARB from the No Action Alternative.

### **3.2.7 Safety and Occupational Health**

Safety and occupational health is the promotion and maintenance of the physical, mental, and social well-being of workers by controlling risk to the highest degree and protecting the safety, health, and welfare of people engaged in work or employment.

#### **3.2.7.1 Affected Environment**

The Dobbins ARB Medical Center offers inpatient care in its multi-room hospital facility and day care for non-emergency needs at clinics across the Base. The Wellstar Kennestone Hospital, approximately 5 miles north of the Base, is the nearest civilian hospital with emergency care services. The Dobbins ARB Fire Department is located at 1483 Refueling Road and provides hazardous materials incident response and fire protection service to the installation. The 94th Security Forces Squadron provides security and law enforcement services on the Base.

Dobbins ARB has a Bird/Wildlife Aircraft Strike Hazard (BASH) Program that implements measures to minimize the hazard caused by interactions of birds or wildlife and aircraft.

#### **3.2.7.2 Environmental Consequences**

##### **Alternative 1 – New Construction (Preferred Alternative)**

Alternative 1 would have no long-term impact on the availability, capabilities, or capacity of emergency services available on Dobbins ARB or in neighboring communities. Alternative 1 would have minor, short-term, direct, adverse impacts on worker safety and occupational health during construction. All construction contractors are required to follow and implement OSHA laws and regulations, as well as applicable DoD, USAF, and AFRC regulations, to establish and maintain safety procedures.

A temporary, secure perimeter fence would be installed around each construction area with a construction access gate. During construction, signs would be placed on roadways to alert drivers to changes in traffic patterns and trucks entering and exiting the road. The proposed facilities would comply with DoD antiterrorism/force protection, Americans with Disabilities Act, and fire protection requirements.

During construction, vegetation and tree removal would displace birds inhabiting the project areas. These birds would likely disperse to another area within the same or adjacent forest stand. It is unlikely that a hazardous amount of birds would relocate to trees closer to the airfield and increase in BASH risk.

Projects would result in safety hazards and short-term, indirect, adverse impacts to construction workers. Following OSHA laws and regulations and applicable DoD, USAF, and AFRC regulations would reduce these indirect impacts. No indirect impacts to safety and occupational health would result from the interaction of Alternative 1 and other ongoing projects.

##### **No Action Alternative**

Under the No Action Alternative, no new construction would occur and existing conditions would continue. There would be no impacts to safety and occupational health from the No Action Alternative.

### **3.2.8 Hazardous Materials and Hazardous Waste**

#### **3.2.8.1 Affected Environment**

The operation of aircraft, vehicles, and equipment requires the use of various universal wastes (e.g., batteries, fluorescent and mercury containing bulbs) and hazardous materials including fuels, solvents, lubricants, and caustics. Common activities at Dobbins ARB that generate hazardous waste include aircraft and vehicle maintenance. The Base has one 90/180-day hazardous waste accumulation

site/central accumulation area at Building 748 for storing and staging hazardous waste for offsite shipment. Dobbins ARB wastes are disposed of through a commercial disposal contractor, Tri-State Government Services, Inc. (Dobbins ARB, 2020b).

The requirements for accumulation, collection, transportation, and disposal of hazardous wastes on Dobbins ARB are identified in Dobbins ARB's *Hazardous Waste Management Plan* (Dobbins ARB, 2020b). The ARB maintains and operates as a small quantity generator for the whole year, but occasionally there are periods when they operate as an episodic large quantity generator. The generating organization and the 94th Mission Support Group (MSG)/Civil Engineering (CE) Environmental Flight (CEV) are responsible for managing hazardous wastes. The 94th MSG/CEV complies with all pertinent federal, state, USAF, and local regulatory requirements.

The Dobbins ARB Spill Prevention, Control, and Countermeasures Plan (Dobbins ARB, 2020c) specifies procedures to be followed when responding to releases, accidents, and spills involving petroleum products, including spill detection, reporting, containment, cleanup, and disposal procedures.

### **Per- and Polyfluorinated Alkyl Substances**

Since the 1970s, the USAF has used aqueous film-forming foam (AFFF) firefighting agents for extinguishing petroleum fires. AFFF have historically utilized the synthetic fluorinated chemicals perfluorooctanoic acid (PFOA), perfluorooctane sulfonate (PFOS) and/or perfluorobutane sulfonate (PFBS) (AFCEC, 2018). These chemicals are very persistent in the environment and can accumulate over time, and exposure to these chemicals can lead to adverse human health effects.

Dobbins ARB has historically stored and used AFFF on Base for firefighting and training purposes but has been actively removing PFOS-based AFFF from its inventory (AFCEC, 2018). The 622 CEG Training Center and the LRS warehouse are located in areas where PFOS has been found during investigations conducted by Dobbins ARB. There is no record of release of PFOS in the areas proposed for the 622 CEG Headquarters or the Fitness Center.

### **622 CEG Training Center**

AFFF Area 13: AFFF Spray Test Area site is entirely contained within the area proposed for development and use for the 622 CEG Training Center. AFFF Area 13 is located near the southeast end of the Dead Runway (former northwest-southeast runway), immediately north of the current aircraft training facility (AFCEC, 2018).

The Dobbins ARB Fire Department has conducted annual AFFF spray testing for many years on the Dead Runway. The Dead Runway is made of concrete construction and bordered by mowed grassy areas to the northeast and southwest sides. During the annual spray testing, approximately 100 gallons of AFFF/water mixed at a 3% solution were discharged and then allowed to dry. Current Dobbins ARB Fire Department spray tests (now using non-perfluorooctanoic acid [PFAS] containing AFFF) are being conducted at the end of the Dead Runway in an area properly contained to capture any AFFF (AFCEC, 2018).

During a site investigation in 2017, soil and groundwater samples were collected at five locations within AFFF Area 13. At four of the five soil sample locations, shallow surface soil (0 – 0.5 foot bgs) contained PFOS concentrations exceeding their respective EPA Regional Screening Level (RSL). PFOA and PFBS concentrations in shallow soil samples did not exceed their respective screening criteria. Soil samples collected from each location immediately above groundwater detected PFOS at one of the locations; all other analytes were non-detect for all locations.

Four of the five groundwater samples collected from temporary wells contained PFOS concentrations at levels exceeding EPA RSLs. Of the four locations that exceeded EPA RSLs for PFOS, three of the locations also exceeded EPA RSLs for PFOA (AFCEC, 2018). Figure 2-3 identifies the location of PFOS-contaminated areas within the site proposed for the 622 CEG Training Center.

### **94 LRS Warehouse**

AFFF Area 12: Motor Pool Facility (Building 516) is located off the south side of Industrial Drive and immediately north of the proposed 94 LRS warehouse site. Building 516 at AFFF Area 12 is surrounded by paved parking and drive areas. These paved areas are bordered by a wooded area to the east, south, and west and by maintained grassy areas to the north.

The 2017 site investigation collected soil and groundwater samples at AFFF Area 12 because of a reported release of AFFF caused by an equipment malfunction during maintenance of a fire engine. The malfunction caused an estimated 2 to 5 gallons of concentrated AFFF to be released to the pavement. This release was allowed to dry in place (AFCEC, 2018).

The investigation collected soil samples from three boring locations and groundwater from one location. Soil borings encountered shallow refusal with the deepest boring progressing to a depth of 24 feet. Surface soil samples were collected, as well as subsurface samples from the bottom of each boring immediately above the encountered refusal. One of the three surface soils samples exceeded the EPA RSL for PFOS; PFOS, PFOA, and PFBS were detected in all surface samples. One of the three subsurface soil samples exceeded the EPA RSL for PFOS. PFOS was detected in the other two subsurface soil samples.

One groundwater sample was collected from a temporary well installed within a soil boring at Building 516. Groundwater collection was also attempted from the other two soil borings; however, because of the shallow refusal, the other locations either did not produce enough water or were dry. The groundwater sample collected contained PFOA and PFOS concentrations at levels exceeding their EPA RSLs. Figure 3-2 identifies the location of groundwater monitoring wells in the vicinity of the site proposed for the 94 LRS warehouse.

### **622 CEG Headquarters Building and Fitness Center**

No per- and polyfluorinated alkyl substance concerns were identified for the 622 Headquarters building or the Fitness Center.

### **Resource Conservation and Recovery Act**

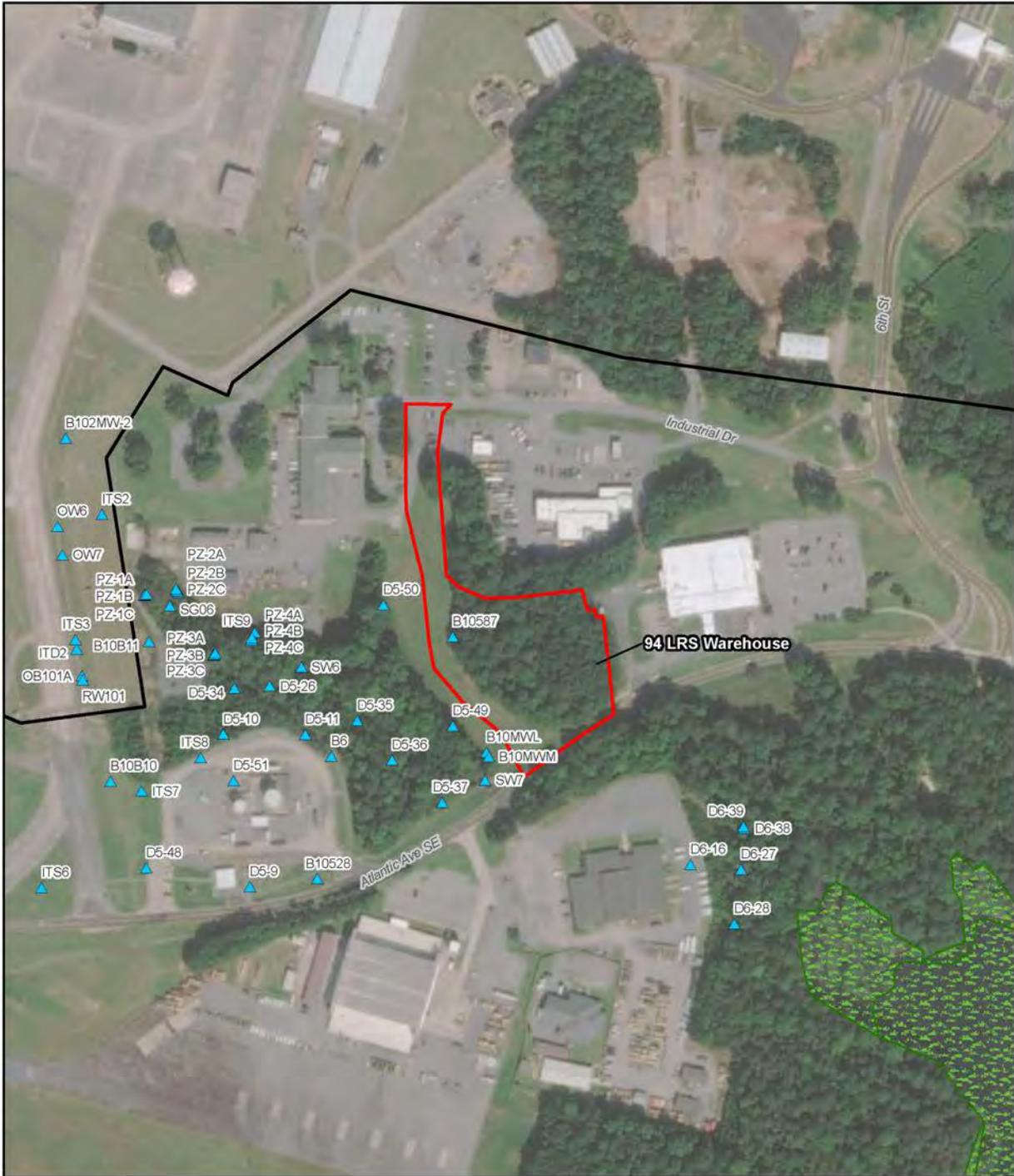
Located to the northwest of the proposed 94 LRS warehouse site is Air Force Plant No. 6 (AFP 6), which is one of nine government-owned, contractor-operated manufacturing facilities maintained by the USAF. AFP 6 began operations in 1942 as a military aircraft modification and production facility. During its history, chemicals associated with facility operations were inadvertently released to the environment.

Currently there are three permanent monitoring wells near the proposed 94 LRS warehouse. Two of these wells are in place for monitoring groundwater within the soils overlying the bedrock and one well is for monitoring a trichloroethene (TCE) plume present within the bedrock. The bulk of the trichloroethene plume being monitored is located to the north-northwest of the proposed 94 LRS warehouse.

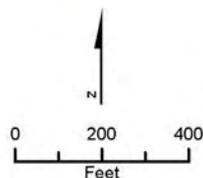
### **3.2.8.2 Environmental Consequences**

#### **Alternative 1 – New Construction (Preferred Alternative)**

For all sites included in the Proposed Action, Alternative 1 would result in minor, short-term, direct, adverse effects resulting from the use of hazardous materials and/or the generation of hazardous waste and solid waste. There would be an increase in construction debris. Solid waste generated from the proposed construction activities would consist of building materials such as solid pieces of concrete, metals, and lumber. Contractors would be required to recycle construction and demolition debris, to the maximum extent practicable, thereby diverting the debris from landfills. All paint-related wastes would be disposed of as hazardous wastes. The construction contract would require the contractor to handle disposal of all hazardous wastes, including contaminated soil if encountered, in accordance with applicable federal, state, and local regulations and requirements, and the Dobbins ARB Hazardous Waste Management Plan. USAF regulations prohibit the use of asbestos- and lead-based paints for new construction. Indirect impacts from the use or generation of hazardous materials and solid waste are not expected as a result of Alternative 1.



- Legend**
- Dobbins Air Reserve Base
  - Proposed Project Area
  - Wetland
  - ▲ Groundwater Monitoring Well



**Figure 3-2**  
**Groundwater Monitoring Wells**  
**Proposed Project Area (Approximate)**  
**94 LRS Warehouse**  
 Dobbins Air Reserve Base, Georgia

Basemap Source: Esri World Imagery, Maxar, 10/4/2020

### **622 CEG Headquarters Building, 94 LRS Warehouse, and Fitness Center**

Once construction is complete, the use of hazardous materials and the generation of solid waste would return to levels comparable to activities currently conducted by building occupants at their existing locations. The 622 CEG Headquarters building and Fitness Center will not generate hazardous wastes. Small amounts of hazardous waste may be generated by the 94 LRS warehouse at a quantity and frequency comparable to the existing facilities.

Groundwater wells present for the monitoring of the AFP 6 near the area of the proposed 94 LRS warehouse will require proper setbacks during design or adequate protections installed prior to construction. Also, additional investigation is planned near the area of the proposed 94 LRS warehouse to fully characterize groundwater contamination associated with AFFF Area 12. No permanent groundwater monitoring wells are currently present for monitoring of PFAS; however, the design of the proposal should consider where new wells are planned to be installed, and proper offsets or protections should be taken to protect any wells present at the time of construction. The likelihood of encountering groundwater during construction is low because the depth to groundwater in the 94 LRS warehouse site is 9 to 22 feet bgs, with bedrock within less than 20 feet bgs in some locations. If further evaluation identifies PFOS soil contamination at the 94 LRS warehouse site, facility design would include measures for removal of impacted soils prior to construction as appropriate.

### **622 CEG Training Center**

Once construction is complete, the type of hazardous materials and generation of solid waste would be consistent with current types; however, the quantity could increase as a result of the training center's expanded size and Reservist training capacity.

Additional investigation is planned for this area of Dobbins ARB to fully characterize contamination associated with AFFF Area 13. No permanent groundwater monitoring wells are currently installed within this area of the Base; however, the design of the proposal should consider new wells may be installed and the proper offsets or protections should be taken to protect the wells. USAF personnel are restricted from conducting training exercises that would disturb soil in the area designated as a PFAS no soil disturbance area.

### **No Action Alternative**

No new construction or development activities are proposed under the No Action Alternative. The hazardous materials used and the hazardous and solid wastes generated would be in the same quantities as those currently used and generated at each site. Therefore, no impacts would be anticipated to human health or the environment from the use of hazardous materials, generation of hazardous or solid waste, or potential impacts to groundwater well networks currently used for monitoring existing site conditions.

### **3.2.9 Traffic and Transportation**

Traffic and transportation is specifically defined as ground transportation for this analysis. Ground transportation resources generally include the roadway and street systems surrounding the affected environment.

#### **3.2.9.1 Affected Environment**

Dobbins ARB is approximately 1 mile west of Interstate (I-) 75 and 1.5 miles north of I-285. The Base has two gates. The main gate is accessed from South Cobb Drive and Cobb Parkway Southeast (U.S. Highway 41). Cobb Parkway Southeast can be accessed by I-75 through either Delk Road Southeast or South Marietta Parkway Southeast. Primary roads within Dobbins ARB include Atlanta Avenue, Industrial Drive, and Gym Road.

### **3.2.9.2 Environmental Consequences**

#### **Alternative 1 – New Construction (Preferred Alternative)**

Under Alternative 1, minor, short-term impacts to the transportation network would occur during the construction phase from an increase in traffic associated with construction equipment and contractor vehicles. During construction, delivery of materials to, and removal of debris from, the construction sites would occur. Traffic control procedures, including flaggers, would minimize impacts on traffic flow. Construction traffic would account for a small percentage of the total traffic on the installation. Many of the heavy construction vehicles would be driven to the site and kept onsite for the duration of construction activities, resulting in relatively few additional trips. The proposed projects would occur at different times and locations on Dobbins ARB, which would further reduce construction traffic.

No new personnel would be added to Dobbins AFB; therefore, there would be no long-term impacts to transportation from Alternative 1.

The implementation of Alternative 1 would not increase or decrease demand for service provided by public transportation. No impacts to public transportation would result from Alternative 1.

Minor, indirect impacts to traffic could occur as a result of Alternative 1 and other recently completed, ongoing, or planned projects if multiple construction projects were to occur at the same time due to the increased demand on local roadways in the vicinity of Dobbins ARB. The implementation of traffic control procedures would minimize impacts on traffic flow. There could also be indirect, adverse impacts on local traffic if construction hours overlap with rush hour. These impacts would not be significant because most heavy equipment would be stored onsite during construction, and construction-related traffic would end once construction is complete.

#### **No Action Alternative**

Under the No Action Alternative, no new construction would occur and existing conditions would continue. There would be no impacts to traffic and transportation from the No Action Alternative.

### **3.2.10 Recreation**

#### **3.2.10.1 Affected Environment**

Recreational facilities at Dobbins ARB include a fitness center and running track. Dobbins FamCamp offers recreational vehicle camping sites for both short- and long-term use overlooking Dobbins Lake.

#### **3.2.10.2 Environmental Consequences**

##### **Alternative 1 – New Construction (Preferred Alternative)**

Alternative 1 includes the construction of a new Fitness Center adjacent to the existing running track. Construction of a new, updated Fitness Center in this location would collocate fitness activities in one centralized area and have moderate, long-term, beneficial impacts on recreation at Dobbins ARB. There would be no impacts to activities associated with Dobbins FamCamp.

##### **No Action Alternative**

Under the No Action Alternative, no new construction would occur and existing conditions would continue. Users of the existing Fitness Center would continue to use substandard gym facilities, resulting in moderate, long-term, adverse impacts to recreation at Dobbins ARB.

### **3.2.11 Utilities**

#### **3.2.11.1 Affected Environment**

Electrical service is provided to Dobbins ARB by Georgia Power through the Lockheed Martin Substation. Various aspects of electrical service infrastructure were recently upgraded when the system was privatized, and it provides sufficient capacity for peak operation. Natural gas is supplied to Dobbins ARB by Atlanta Gas Light Company. Natural gas capacity is adequate for current operation; demand approaches capacity only during peak winter (cold) periods (AFRC, 2020).

Cobb County-Marietta Water Authority provides potable water for Dobbins ARB through a contract agreement with Lockheed Martin. The Cobb County-Marietta Water Authority has two water treatment plants that are permitted to produce 86 and 72 million gallons of water per day (AFRC, 2020).

Wastewater is collected Base-wide and routed to a treatment plant currently owned and operated by Lockheed Martin. After treatment, all suitable discharge is ultimately conveyed to Nickajack Creek (AFRC, 2020).

Nonhazardous solid wastes are collected in dumpsters located throughout Dobbins ARB and transported by a contractor to permitted municipal landfills. Recyclable items are collected in separate receptacles and processed at the Base's Recycling Center. Construction and demolition wastes are separated from the solid waste stream and recycled at the Base (AFRC, 2020).

#### **3.2.11.2 Environmental Consequences**

##### **Alternative 1 – New Construction (Preferred Alternative)**

Negligible, short-term impacts on utilities would be expected from Alternative 1. Short-term interruptions could occur when buildings are disconnected from or connected to utilities. Interruptions in services would be coordinated with area users prior to disconnection to the extent practicable. Existing utilities in or near the construction footprint would be identified in advance of construction to limit impacts.

Negligible, long-term impacts to utility systems would be expected from Alternative 1 because of the increased demand from the increased building space for select projects. Buildings erected in areas not currently occupied would require expansion of existing utility delivery to provide service, but there would be no change in infrastructure capacity. The proposed Fitness Center would require extensions of electric, gas, sewer, and water utilities from their nearest location. Energy supply, water supply, and wastewater treatment capacity are sufficient to accommodate the increased demand resulting from the new structures.

Alternative 1 would result in minor, short-term impacts from an increase in general construction debris. Solid waste generated from the proposed construction activities would consist of building materials such as solid pieces of concrete, metals, and lumber. Contractors would be required to recycle construction debris to the maximum extent practicable, thereby diverting it from landfills. Materials with possible recycling potential include glass, plastics, asphalt, concrete, metal, carpeting, and gypsum wallboard and lumber.

Under Alternative 1, minor, long-term, adverse impacts could result from permanently using landfill capacity through the disposal of nonrecyclable construction debris. However, the quantity of waste generated would not exceed the capacity of regional facilities. There would be negligible long-term change in the future quantity of solid waste generated compared to existing levels because personnel and the types of activities would remain about the same.

Alternative 1 would interact with other recently completed, ongoing, or planned projects and increase the demand on local utilities. However, the increased demand would be within the regional capacity and no significant indirect impacts would be expected. The construction of modern energy-efficient buildings would result in indirect improvements to energy use, which would be a benefit to energy consumption in the region.

**No Action Alternative**

Under the No Action Alternative, no new construction would occur and existing conditions would continue. There would be no impact to utilities from the No Action Alternative.

## 4. Findings and Conclusions

### 4.1 Findings

No significant environmental or socioeconomic impacts have been identified from the Preferred Alternative. Table 4-1 summarizes the consequences of Alternative 1 and the No Action Alternative. The following sections provide a summary of the anticipated impacts of each alternative.

#### 4.1.1 Consequences of Alternative 1 – New Construction (Preferred Alternative)

Implementation of Alternative 1 would result in negligible to minor, adverse impacts to soils, surface water, stormwater, air quality, noise, safety and occupational health, hazardous materials, traffic, and utilities. While these impacts would be less than significant, they will be further reduced by implementing BMPs. Applicable construction permits would be obtained, and health and safety procedures would be implemented during construction. Dobbins ARB would implement appropriate measures to further reduce unavoidable impacts of the proposed project (Table 4-2). Project design measures would be used to control fugitive dust emissions, minimize soil erosion, manage hazardous materials, and reduce the generation of wastes during construction and operation. Construction activities would occur during daytime hours to minimize disturbance.

The use of appropriate construction and post-construction BMPs and the implementation of stormwater controls and NPDES permit requirements would result in negligible impacts from stormwater runoff. There may be incidental wildlife mortality associated with construction; however, BMPs would reduce the likelihood of any injury or mortality. There is the potential for minor, short-term disturbances to MBTA species if construction is scheduled during the bird breeding season. Preconstruction surveys would be conducted to avoid or minimize any adverse effects on nesting birds. The overall impact to biological resources is expected to be less than significant. Impacts to traffic and transportation would end after the completion of construction.

There would be moderate, long-term, beneficial impacts to recreation at Dobbins ARB from the construction of a new fitness center and minor, short-term, beneficial impacts to socioeconomics during construction.

The potential for indirect, negative impacts resulting from the interaction of Alternative 1 with other past, present, and reasonably foreseeable projects is less than significant. Construction projects could result in localized short-term, indirect impacts if multiple proposed projects occur at the same time.

No significant impacts would result from the implementation of Alternative 1.

**Table 4-1. Summary of Potential Environmental and Socioeconomic Consequences**

*Environmental Assessment for Construction Projects at Dobbins ARB, Georgia*

Resource	Environmental and Socioeconomic Consequences	
	No Action	Alternative 1
<b>Geology and Soils</b>	No impact	Minor, long-term, adverse impacts from site preparation and construction. Appropriate BMPs would be implemented to minimize erosion and impacts from stormwater runoff.
<b>Water Resources</b>		
Surface Water	No impact	Negligible, short-term impact. Potential adverse impacts to surface water quality from spills would be minimized by properly storing materials and fueling and maintaining construction equipment offsite or in designated areas with appropriate control and containment.
Stormwater	No impact	Minor, long-term impact on stormwater systems resulting from a net increase in impervious surfaces.
Wetlands	No impact	No impact.

**Table 4-1. Summary of Potential Environmental and Socioeconomic Consequences**  
*Environmental Assessment for Construction Projects at Dobbins ARB, Georgia*

Resource	Environmental and Socioeconomic Consequences	
	No Action	Alternative 1
<b>Air Quality</b>		
<i>Criteria Pollutants</i>	No impact	Minor, short-term, direct, adverse impacts on overall air quality from construction activities and minor, long-term, direct adverse impacts on overall air quality from the operation of the new facilities. BMPs would be used to minimize these impacts.
<i>Climate Change and Greenhouse Gases</i>	No impact	Negligible long-term, adverse impacts to climate change as a result of construction-related GHG emissions.
<b>Noise</b>	No impact	Minor, short-term, adverse noise impacts during construction from heavy equipment. Construction activities would be limited to typical working hours. Workers would be required to wear appropriate hearing protection.
<b>Biological Resources</b>		
<i>Vegetation</i>	No impact	Minor, long-term, adverse impacts from the removal of approximately 6.3 total acres of forest for the construction of the new facilities.
<i>Wildlife</i>	No impact	Minor, short-term, adverse impacts from noise, construction activities, heavy equipment use, and incidental mortalities. Minor, long-term, adverse impacts from habitat removal.
<i>Special-Status Species</i>	No impact	No impact.
<b>Socioeconomic Resources</b>	No impact	Minor, short-term, beneficial impacts during construction.
<b>Safety and Occupational Health</b>	No impact	Minor, short-term, adverse impacts from construction hazards. Appropriate safety plans and OSHA regulations would be followed to limit the risk of accidents.
<b>Hazardous Materials</b>	No impact	Minor, short-term, adverse impacts from the use of small quantities of potentially hazardous materials (e.g., gasoline, oils, coolant, lubricants, paints, solvents, etc.) during construction. Waste would be handled and disposed of in accordance with federal and state regulations. Facilities and training activities would avoid known PFAS-contaminated soil and groundwater and site design would avoid existing or planned groundwater monitoring wells.
<b>Traffic and Transportation</b>	No impact	Minor, short-term, adverse impacts from an increase in construction and personal vehicles along local roads during construction.
<b>Recreation</b>	Moderate, long-term, adverse impacts. Users of the Fitness Center would continue to use substandard gym facilities	Moderate, long-term, beneficial impacts from the construction of a new Fitness Center adjacent to the running track.
<b>Utilities</b>	No impact	Negligible, short-term, adverse impacts could occur when proposed buildings are connected to utilities. Negligible, long-term, adverse impacts could occur from an increase in demand associated with the proposed new facilities. Minor, long-term, adverse impacts could occur from a decrease in landfill capacity from the disposal of nonrecyclable construction debris.

BMP = best management practice

GHG = greenhouse gas

OSHA = Occupational Safety and Health Administration

**Table 4-2. Summary of Proposed Measures to Avoid or Minimize Impacts**  
*Environmental Assessment for Construction Projects at Dobbins ARB, Georgia*

Resource Area	Proposed Measures
Air Quality	Apply water to, or use other stabilization measures on, areas of bare soil or soil piles; create wind breaks; and cover dump trucks that transport materials that could become airborne. Additionally, require contractors to maintain construction equipment in accordance with manufacturers' specifications to reduce exhaust emissions.
Noise	Limit construction activities to typical daytime working hours. Require workers to wear appropriate hearing protection.
Soils	Use sediment barriers (silt fence or straw wattles), temporary detention basins, grade stabilization with seed and mulch, and geotextile slope stabilization to minimize impacts on soils.
Surface Water	Use sediment barriers (silt fence or straw wattles), temporary detention basins, grade stabilization with seed and mulch, and geotextile slope stabilization to minimize erosion and the transport of sediments to surface waters.
Stormwater/Wetlands	Implement project-specific design measures and effective post-construction BMPs to comply with the applicable NPDES permits. To prevent onsite and downstream impacts from stormwater during and after construction, preserve natural vegetation; implement buffer zones around exposed areas; use mulch, matting, and netting; seed and plant disturbed areas; use sediment barriers (silt fence, straw bales, or brush), and protect storm inlets and drains.
Wildlife	Conduct preconstruction surveys for breeding birds to avoid impacts on MBTA species if vegetation clearing is required during the bird breeding season (15 April through 30 September).
Transportation	Use clearly indicated detours and traffic control signalers to keep traffic moving during periods of heavy construction-related traffic or temporary road closures.
Hazardous Materials	Require the construction contractor to handle the disposal of all hazardous materials and solid waste in accordance with applicable federal, state, and local regulations and requirements, including the Dobbins ARB Hazardous Waste Management Plan. Dispose of all paint-related waste as hazardous waste. Require contractors to recycle construction debris to the maximum extent practicable. Prohibit disturbance of PFAS-contaminated soils and groundwater during training activities and construction. Create exclusion buffer around existing and planned monitoring wells.

#### 4.1.2 Consequences of the No Action Alternative

Under the No Action Alternative, construction of new facilities would not occur, which does not meet current USAF requirements. The 622 CEG would be forced to operate without a permanent operational location. The 622 CEG's ECS-TCC would not meet its mission requirement for RADR training and would not be able to accommodate additional Reservists proposed for training. LRS warehouse staff would continue to work in improperly sized and configured facilities that do not meet mission requirements and result in inefficient use of time and resources. Users of the Fitness Center would continue to use substandard gym facilities.

## 4.2 Conclusions

Based on the findings of this EA, we recommend that the Proposed Action, as it is written and proposed, be implemented and that a FONSI be issued for the Proposed Action.

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## 5. References

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Environmental Assessment for Construction Projects  
Dobbins Air Reserve Base, Georgia

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## 6. List of Preparers

**Table 6-1. List of Preparers**

*Environmental Assessment for Construction Projects at Dobbins ARB, Georgia*

Name	Degree(s)	Years of Work Experience
Ursula Rogers	B.S., Biology	14
Rich Reaves	Ph.D., Wetland and Wildlife Ecology	26
Andrea Naccarato	B.S., Biology (minors in Chemistry and Geography-Environmental Studies)	21
Sara Jackson	B.S., Environmental Studies	21
Jeremy Hollins	M.A., Public History	17
Grant Koster	B.S., Geology	14
Caitlin Santinelli	B.S., Earth and Atmospheric Science	13

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Appendix A  
Coordination Letters and Responses

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**DEPARTMENT OF THE AIR FORCE  
AIR FORCE RESERVE COMMAND**

March 22, 2021

MEMORANDUM FOR DISTRIBUTION

FROM: 94 MSG/CEV  
901 Industrial Drive  
Dobbins ARB, GA 30069

SUBJECT: Environmental Assessment for Construction of New Facilities on Dobbins Air Reserve Base (ARB), Georgia

1. Dobbins ARB is in the process of preparing an Environmental Assessment (EA) to assess the potential environmental consequences of a proposal to construct new buildings and training facilities to support operations and training on the installation (Figure 2-1).
2. Under the Proposed Action, a new Logistics Readiness Squadron warehouse would be constructed in the Mission Support District, a new Fitness Center and a new Headquarters building for the 622nd Civil Engineering Group would be constructed in the Joint Use District, and a new storage building would be constructed in the Training District in the vicinity of the Dead Runway Training Area. Additionally, training facility upgrades would be completed and training would continue at the Dead Runway Training Area, including earth moving, rapid airfield damage recovery, crane operation, and mine detection. Figures 2-2 through 2-5 show the location and estimated boundaries for each proposed project. The Proposed Action does not involve an increase in full-time personnel but may result in approximately 1,000 additional Reservists participating in training events spread throughout the year. A No Action Alternative will be included in the analysis.
3. The purpose of this correspondence is to solicit your comments and concerns regarding the Proposed Action. Identification of issues early in the environmental impact analysis process allows us to focus our analysis on issues identified in the development stage and, if practicable, identify alternatives to minimize environmental impacts.
4. The Air Force will accept comments at any time during the environmental process. To ensure sufficient time to consider your input in the preparation of this EA, please provide information or comments to Mr. Parker Johnson, 901 Industrial Drive, Building 510, Dobbins ARB, GA 30069 no later than 30 April 2021.

5. Thank you in advance for your assistance in this matter. The point of contact for this action is Mr. Parker Johnson, (678) 655-3549, [william.johnson.200@us.af.mil](mailto:william.johnson.200@us.af.mil). Please feel free to contact him with any questions you may have.

Sincerely,

POWELL.WILLIAM.C.1030153312  
M.C.1030153312  
WILLIAM C. POWELL, GS-12, DAF  
Chief, Environmental Flight

Digitally signed by  
POWELL.WILLIAM.C.10301533  
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Attachments:

Description of the Proposed Action and Alternatives

DISTRIBUTION (listed on next page)

## Distribution List

U.S. Environmental Protection Agency, Region 4  
Office of the Regional Administrator  
Ms. Mary Walker, Regional Administrator  
Sam Nunn Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, GA 30303-3104

U.S. Army Corps of Engineers  
South Atlantic Division  
60 Forsyth Street SW  
Atlanta, GA 30303-8801

Georgia Environmental Protection Division  
Georgia Department of Natural Resources  
2 Martin Luther King Jr. Drive SE  
Suite 1456, East Tower  
Atlanta, GA 30334

Georgia State Parks and Historic Sites  
Georgia Department of Natural Resources  
2600 Highway 155 SW  
Stockbridge, GA 30281

Cobb County Community Development Department  
P.O. Box 649  
Marietta, GA 30061

Cobb Chamber of Commerce  
P.O. Box 671868  
Marietta, GA 30006-0032

Cobb County Board of Commissioners  
100 Cherokee Street  
Marietta, GA 30090

Mr. Mike Boyce  
Cobb County Commission Chairman  
100 Cherokee Street  
Marietta, GA 30090

Mr. Rob Hosack  
Cobb County Manager  
100 Cherokee Street  
Marietta, GA 30090

Ms. Jessica Guinn  
Director, Cobb County Community Development  
Department  
P.O. Box 649  
Marietta, GA 30061

Cobb County Soil and Water Conservation District  
678 South Cobb Drive, Suite 150  
Marietta, GA 30060

Cobb County Department of Transportation  
1890 County Services Parkway  
Marietta, GA 30008

Mr. Rusty Roth, Director  
City of Marietta Department of Planning and  
Zoning Development Services  
P.O. Box 609  
Marietta, GA 30061-0609

Mr. William Bruton, Jr.  
Marietta City Manager  
205 Lawrence Street  
Marietta, GA 30060

Mr. Rich Buss  
Director, City of Marietta Parks, Recreation,  
and Facilities  
P.O. Box 609  
Marietta, GA 30061

City of Smyrna  
2800 King Street  
Smyrna, GA 30080

Atlanta Regional Commission  
229 Peachtree St NE, Suite 100  
Atlanta, GA 30303

Note: The Description of the Proposed Action and Alternatives (DOPPA) was included in the letter but is not included in this appendix to avoid duplication with Sections 1 and 2 of the *Environmental Assessment for Construction Projects at Dobbins Air Reserve Base, Georgia*.



DEPARTMENT OF THE AIR FORCE  
AIR FORCE RESERVE COMMAND

22 March 2021

MEMORANDUM FOR: U.S. Fish and Wildlife Service  
Southeast Region, Region 4  
1875 Century Blvd., Suite 200  
Atlanta, GA 30345

FROM: 94 MSG/CEV  
901 Industrial Drive  
Dobbins ARB, GA 30069

SUBJECT: Section 7 Review for Construction of New Facilities on Dobbins Air Reserve Base (ARB), Georgia

1. Dobbins ARB is preparing an Environmental Assessment (EA) to evaluate the potential environmental consequences of a proposal to construct new buildings and training facilities to support operations and training on the installation (Attachment 1, Figure 2-1).
2. Under the Proposed Action, a new Logistics Readiness Squadron warehouse would be constructed in the Mission Support District, a new fitness center and a new Headquarters building for the 622nd Civil Engineering Group would be constructed in the Joint Use District, and a new storage building would be constructed in the Training District in the vicinity of the Dead Runway Training Area. Additionally, training facility upgrades would be completed and training would continue at the Dead Runway Training Area, including earth moving, rapid airfield damage recovery, crane operation, and mine detection. Figures 2-2 through 2-5 show the location and estimated boundaries for each proposed project (Attachment 1). The Proposed Action does not involve an increase in full-time personnel but may result in approximately 1,000 additional Reservists participating in training events spread throughout the year.
3. Dobbins ARB manages its natural resources in accordance with its Integrated Natural Resources Management Plan (INRMP). The most current Dobbins INRMP is in effect from January 2018 through January 2023. The most recent annual review of the INRMP, which was reviewed and approved by the U.S. Fish and Wildlife Service (USFWS), occurred in January 2021. Dobbins ARB evaluated the potential for effects on federally listed species identified by the USFWS (Consultation Code: 04EG1000-2021-SLI-1208, dated 19 February 2021; Attachment 2) as having the potential to occur within the Proposed Action project areas. These species include Michaux's Sumac (*Rhus michauxii*) and White Fringeless Orchid (*Platanthera integrilabia*). Neither species have been observed on Dobbins ARB, and both species have been determined to be unlikely to occur on the installation.

4. Dobbins ARB has determined that the Proposed Action would have **no effect** on federally listed species. Additionally, there is no designated critical habitat within Dobbins ARB, and therefore, no potential for adverse modification or destruction of critical habitat.

5. If you have any questions or concerns regarding our determination, please contact Mr. Parker Johnson within 30 days of receipt of this letter. Mr. Johnson can be reached by phone at (678) 655-3549 or by email at [william.johnson.200@us.af.mil](mailto:william.johnson.200@us.af.mil).

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AM.C.10301533 | POWELL.WILLIAM.C.10301  
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WILLIAM C. POWELL, GS-12, DAF  
Chief, Environmental Flight

Attachments:

1. Description of the Proposed Action and Alternatives
2. USFWS List of Threatened and Endangered Species

Attachment 1  
Description of the Proposed Action and Alternatives

Note: The Description of the Proposed Action and Alternatives (DOPPA) was included in the letter but is not included in this appendix to avoid duplication with Sections 1 and 2 of the *Environmental Assessment for Construction Projects at Dobbins Air Reserve Base, Georgia*.

Attachment 2  
USFWS List of Threatened and Endangered Species



## United States Department of the Interior



FISH AND WILDLIFE SERVICE  
Georgia Ecological Services Field Office  
355 East Hancock Avenue  
Room 320  
Athens, GA 30601  
Phone: (706) 613-9493 Fax: (706) 613-6059

In Reply Refer To:  
Consultation Code: 04EG1000-2021-SLI-1208  
Event Code: 04EG1000-2021-E-02313  
Project Name: Dobbins ARB Construction Projects

February 19, 2021

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

### To Whom It May Concern:

Thank you for your recent request for information on federally listed species and important wildlife habitats that may occur in your project area. The U.S. Fish and Wildlife Service (Service) has responsibility for certain species of wildlife under the Endangered Species Act (ESA) of 1973 as amended (16 USC 1531 et seq.), the Migratory Bird Treaty Act (MBTA) as amended (16 USC 701-715), and the Bald and Golden Eagle Protection Act (BGEPA) as amended (16 USC 668-668c). We are providing the following guidance to assist you in determining which federally imperiled species may or may not occur within your project area and to recommend some conservation measures that can be included in your project design if you determine those species or designated critical habitat may be affected by your proposed project.

### **FEDERALLY-LISTED SPECIES AND DESIGNATED CRITICAL HABITAT**

Attached is a list of endangered, threatened, and proposed species that may occur in your project area. Your project area may not necessarily include all or any of these species. Under the ESA, it is the responsibility of the Federal action agency or its designated representative to determine if a proposed action "may affect" endangered, threatened, or proposed species, or designated critical habitat, and if so, to consult with the Service further. Similarly, it is the responsibility of the Federal action agency or project proponent, not the Service, to make "no effect" determinations. If you determine that your proposed action will have "no effect" on threatened or endangered species or their respective critical habitat, you do not need to seek concurrence with the Service. Nevertheless, it is a violation of Federal law to harm or harass any federally-listed threatened or endangered fish or wildlife species without the appropriate permit.

If you determine that your proposed action may affect federally listed species, please consult with the Service. Through the consultation process, we will analyze information contained in a biological assessment or equivalent document that you provide. If your proposed action is associated with Federal funding or permitting, consultation will occur with the Federal agency under section 7(a)(2) of the ESA. Otherwise, an incidental take permit pursuant to section 10(a)(1)(B) of the ESA (also known as a Habitat Conservation Plan) may be necessary to exempt harm or harass federally listed threatened or endangered fish or wildlife species. For more information regarding formal consultation and HCPs, please see the Service's Consultation Handbook and Habitat Conservation Plans at [www.fws.gov/endangered/esa-library/index.html#consultations](http://www.fws.gov/endangered/esa-library/index.html#consultations).

**Action Area.** The scope of federally listed species compliance not only includes direct effects, but also any indirect effects of project activities (e.g., equipment staging areas, offsite borrow material areas, or utility relocations). The action area is the spatial extent of an action's direct and indirect modifications to the land, water, or air (50 CFR 402.02). Large projects may have effects to land, water, or air outside the immediate footprint of the project, and these areas should be included as part of the action area. Effects to land, water, or air outside of a project footprint could include things like lighting, dust, smoke, and noise. To obtain a complete list of species, the action area should be uploaded or drawn in IPaC rather than just the project footprint.

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

If you determine that your action may affect any federally listed species and would like technical assistance from our office please provide the following information (reference to these items can be found in 50 CFR§402.13 and 402.14):

A description of the proposed action, including any measures intended to avoid, minimize, or offset effects of the action. Consistent with the nature and scope of the proposed action, the description shall provide sufficient detail to assess the effects of the action on listed species and critical habitat, including:

1. The purpose of the action;
  2. The duration and timing of the action;
  3. The location of the action;
  4. The specific components of the action and how they will be carried out;
  5. Description of areas to be affected directly or indirectly by the action;
-

6. Information on the presence of listed species in the action area;
7. Description of effects of the action on species in the action area;
8. Maps, drawings, blueprints, or similar schematics of the action; and
9. Any other available information related to the nature and scope of the proposed action relevant to its effects on listed species or designated critical habitat (examples include: stormwater plans, management plans, erosion and sediment plans).

**Please submit all consultation documents via email to [gaes\\_assistance@fws.gov](mailto:gaes_assistance@fws.gov)** or by using IPaC, uploaded documents, and sharing the project with a specific Georgia Ecological Services staff member. If the project is on-going, documents can also be sent to the Georgia ES staff member currently working with you on your project. For Georgia Department of Transportation-related projects, please work with the Office of Environmental Services ecologist to determine the appropriate USFWS transportation liaison.

## **WETLANDS AND FLOODPLAINS**

Under Executive Orders 11988 and 11990, Federal agencies are required to minimize the destruction, loss, or degradation of wetlands and floodplains, and preserve and enhance their natural and beneficial values. These habitats should be conserved through avoidance, or mitigated to ensure that there would be no net loss of wetlands function and value.

We encourage you to use the National Wetland Inventory (NWI) maps in conjunction with ground-truthing to identify wetlands occurring in your project area. The Service's NWI program website, [www.fws.gov/wetlands/Data/Mapper.html](http://www.fws.gov/wetlands/Data/Mapper.html) integrates digital map data with other resource information. We also recommend you contact the U.S. Army Corps of Engineers for permitting requirements under section 404 of the Clean Water Act if your proposed action could impact floodplains or wetlands.

## **MIGRATORY BIRDS**

The MBTA prohibits the taking of migratory birds, nests, and eggs, except as permitted by the Service's Migratory Bird Office. To minimize the likelihood of adverse impacts to migratory birds, we recommend construction activities occur outside the general bird nesting season from March through August, or that areas proposed for construction during the nesting season be surveyed, and when occupied, avoided until the young have fledged.

We recommend review of Birds of Conservation Concern at website [www.fws.gov/migratorybirds/CurrentBirdIssues/Management/BCC.html](http://www.fws.gov/migratorybirds/CurrentBirdIssues/Management/BCC.html) to fully evaluate the effects to the birds at your site. This list identifies birds that are potentially threatened by disturbance and construction.

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Information related to wind energy development and migratory birds can be found at this location: <https://www.fws.gov/birds/management/project-assessment-tools-and-guidance/guidance-documents/wind-energy.php>.

## **BALD AND GOLDEN EAGLES**

The bald eagle (*Haliaeetus leucocephalus*) was delisted under the ESA on August 9, 2007. Both the bald eagle and golden eagle (*Aquila chrysaetos*) are still protected under the MBTA and BGEPA. The BGEPA affords both eagles protection in addition to that provided by the MBTA, in particular, by making it unlawful to “disturb” eagles. Under the BGEPA, the Service may issue limited permits to incidentally “take” eagles (e.g., injury, interfering with normal breeding, feeding, or sheltering behavior nest abandonment). For information on bald and golden eagle management guidelines, we recommend you review information provided at <https://www.fws.gov/birds/management/managed-species/bald-and-golden-eagle-information.php> and <https://www.fws.gov/birds/management/managed-species/eagle-management.php>. Additionally the following site will help you determine if your activity is likely to take or disturb bald eagles in the southeast (<https://www.fws.gov/southeast/our-services/eagle-technical-assistance>).

## **NATIVE BAT COMMENTS**

If your species list includes Indiana bat or northern long-eared bat and the project is expected to impact forested habitat that is appropriate for maternity colonies of these species, forest clearing during the winter. Federally listed bats could be actively present in forested landscapes from April 1 to October 15 of any year and have non-volant pups from May 15 to July 31 in any year. Non-volant pups are incapable of flight and are vulnerable to disturbance during that time.

Additional information on bat avoidance and minimization can be found at the following link: [https://www.fws.gov/athens/transportation/pdfs/Bat\\_AMMs.pdf](https://www.fws.gov/athens/transportation/pdfs/Bat_AMMs.pdf).

Additional information that addresses at-risk or high priority natural resources can be found in the State Wildlife Action Plan (<https://georgiawildlife.com/WildlifeActionPlan>), at Georgia Department of Natural Resources, Wildlife Resources Division Rare Species and Natural Community Portal (<https://georgiawildlife.com/conservation/species-of-concern>), Georgia's Natural, Archaeological, and Historic Resources GIS portal (<https://www.gnahrgis.org/gnahrgis/index.do>), and Georgia Ecological Services Watershed Guidance portal (<https://www.fws.gov/athens/transportation/coordination.html>).

Thank you for your concern for endangered and threatened species. We appreciate your efforts to identify and avoid impacts to listed and sensitive species in your project area. For further consultation on your proposed activity, please email [gaes\\_assistance@fws.gov](mailto:gaes_assistance@fws.gov) and reference your Service Consultation Tracking Number (Consultation Code).

This letter constitutes Georgia Ecological Services' general comments under the authority of the Endangered Species Act.

---

Attachment(s):

- Official Species List
  - Migratory Birds
-

## Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

**Georgia Ecological Services Field Office**

355 East Hancock Avenue

Room 320

Athens, GA 30601

(706) 613-9493

---

## Project Summary

Consultation Code: 04EG1000-2021-SLI-1208

Event Code: 04EG1000-2021-E-02313

Project Name: Dobbins ARB Construction Projects

Project Type: DEVELOPMENT

Project Description: Construct the following new facilities: 622 Civil Engineering Group (CEG) Headquarters building (approx. 2 acres), 622 CEG training facilities on and adjacent to the existing Dead Runway (49 acres, majority is paved or developed), 94 Logistic Readiness Squadron Warehouse (approx. 4 acres), and Fitness Center (approx. 6 acres).

Project Location:

Approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@33.915881600000006,-84.5118263101337,14z>



Counties: Cobb County, Georgia

## Endangered Species Act Species

There is a total of 2 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries<sup>1</sup>, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

- 
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

## Flowering Plants

NAME	STATUS
Michaux's Sumac <i>Rhus michauxii</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/5217">https://ecos.fws.gov/ecp/species/5217</a>	Endangered
White Fringeless Orchid <i>Platanthera integrilabia</i> Population: No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/1889">https://ecos.fws.gov/ecp/species/1889</a>	Threatened

## Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

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## Migratory Birds

Certain birds are protected under the Migratory Bird Treaty Act<sup>1</sup> and the Bald and Golden Eagle Protection Act<sup>2</sup>.

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

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1. The [Migratory Birds Treaty Act](#) of 1918.
  2. The [Bald and Golden Eagle Protection Act](#) of 1940.
  3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

The birds listed below are birds of particular concern either because they occur on the [USFWS Birds of Conservation Concern](#) (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ [below](#). This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the [E-bird data mapping tool](#) (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found [below](#).

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
<p>Bald Eagle <i>Haliaeetus leucocephalus</i></p> <p>This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.</p> <p><a href="https://ecos.fws.gov/ecp/species/1626">https://ecos.fws.gov/ecp/species/1626</a></p>	Breeds Sep 1 to Jul 31
<p>Blue-winged Warbler <i>Vermivora pinus</i></p> <p>This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA</p>	Breeds May 1 to Jun 30

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NAME	BREEDING SEASON
<p>Cerulean Warbler <i>Dendroica cerulea</i>  This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.  <a href="https://ecos.fws.gov/ecp/species/2974">https://ecos.fws.gov/ecp/species/2974</a></p>	Breeds Apr 28 to Jul 20
<p>Henslow's Sparrow <i>Ammodramus henslowii</i>  This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.  <a href="https://ecos.fws.gov/ecp/species/3941">https://ecos.fws.gov/ecp/species/3941</a></p>	Breeds May 1 to Aug 31
<p>Kentucky Warbler <i>Oporornis formosus</i>  This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.</p>	Breeds Apr 20 to Aug 20
<p>King Rail <i>Rallus elegans</i>  This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.  <a href="https://ecos.fws.gov/ecp/species/8936">https://ecos.fws.gov/ecp/species/8936</a></p>	Breeds May 1 to Sep 5
<p>Prairie Warbler <i>Dendroica discolor</i>  This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.</p>	Breeds May 1 to Jul 31
<p>Prothonotary Warbler <i>Protonotaria citrea</i>  This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.</p>	Breeds Apr 1 to Jul 31
<p>Red-headed Woodpecker <i>Melanerpes erythrocephalus</i>  This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.</p>	Breeds May 10 to Sep 10
<p>Rusty Blackbird <i>Euphagus carolinus</i>  This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.</p>	Breeds elsewhere
<p>Wood Thrush <i>Hylocichla mustelina</i>  This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.</p>	Breeds May 10 to Aug 31

## Probability Of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

### Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is  $0.25/0.25 = 1$ ; at week 20 it is  $0.05/0.25 = 0.2$ .
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

### Breeding Season (■)

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

### Survey Effort (|)

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

### No Data (—)

A week is marked as having no data if there were no survey events for that week.

### Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.

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■ probability of presence   ■ breeding season   | survey effort   — no data

SPECIES    JAN    FEB    MAR    APR    MAY    JUN    JUL    AUG    SEP    OCT    NOV    DEC

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Additional information can be found using the following links:

- Birds of Conservation Concern <http://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php>
- Measures for avoiding and minimizing impacts to birds <http://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php>
- Nationwide conservation measures for birds <http://www.fws.gov/migratorybirds/pdf/management/nationwidestandardconservationmeasures.pdf>

## Migratory Birds FAQ

**Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.**

[Nationwide Conservation Measures](#) describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. [Additional measures](#) or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

**What does IPaC use to generate the migratory birds potentially occurring in my specified location?**

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [AKN Phenology Tool](#).

**What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?**

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go to the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

**How do I know if a bird is breeding, wintering, migrating or present year-round in my project area?**

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may refer to the following resources: [The Cornell Lab of Ornithology All About Birds Bird Guide](#), or (if you are unsuccessful in locating the bird of interest there), the [Cornell Lab of Ornithology Neotropical Birds guide](#). If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your

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project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

### **What are the levels of concern for migratory birds?**

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

### **Details about birds that are potentially affected by offshore projects**

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

### **What if I have eagles on my list?**

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

### **Proper Interpretation and Use of Your Migratory Bird Report**

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no

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data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

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DEPARTMENT OF THE AIR FORCE  
AIR FORCE RESERVE COMMAND

22 March 2021

MEMORANDUM FOR: Georgia Historic Preservation Division  
ATTN: Dr. David Crass  
Georgia Department of Community Affairs  
60 Executive Park South, NE  
Atlanta, GA 30329

FROM: 94 MSG/CEV  
901 Industrial Drive  
Dobbins ARB, GA 30069

SUBJECT: Section 106 Consultation for Construction of Four Facilities at Dobbins Air Reserve Base, Cobb County, Georgia

1. The Air Force Reserve Command (AFRC) and Dobbins Air Reserve Base (ARB) are preparing an Environmental Assessment (EA) in accordance with the National Environmental Policy Act of 1969 (NEPA). The EA will analyze the potential impacts and environmental consequences associated with the construction and operation of four new facilities at Dobbins ARB in Cobb County, Georgia (Attachment: Figures 1-1 and 2-1). The EA will evaluate potential environmental consequences of the Proposed Action and alternatives in accordance with the provisions of the *Code of Federal Regulations* (CFR) Title 32, Part 989, and 40 CFR Parts 1500 through 1508 (Council on Environmental Quality's NEPA implementing regulations). We are seeking concurrence from your office regarding Dobbins ARB's determination of effects from the Proposed Action, pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended.

2. PROJECT DESCRIPTION: Dobbins ARB proposes to construct four new facilities at Dobbins ARB, comprising a new 622nd Civil Engineering Group (622 CEG) headquarters building, a 622 CEG training center, a Logistics Readiness Squadron (LRS) warehouse, and a fitness center.

- a. 622 CEG Headquarters: A new headquarters building would be constructed on 2 acres of wooded land adjacent to the existing 622 CEG classroom buildings, eliminating unnecessary vehicle traffic between administrative and training facilities. The proposed headquarters building would encompass 12,543 square feet (Attachment: Figure 2-2).
- b. 622 CEG Training Center: The training center would include a vehicle and equipment storage building, as well as training facility upgrades. The storage building would be constructed in the undeveloped area adjacent to the southeast end of the Dead Runway and southeast of the aircraft fire training pit. Training in this area would include earth-moving activities using heavy equipment, such as bulldozers and backhoes operating on the southwest end of the Dead Runway or just north of Hull Place, southeast of the existing

hangar (Building 1011) currently occupied by the U.S. Army Reserve. The footprint of the storage building would be 1,200 square feet and the building would sit on a 60,000-square-foot concrete pad (Attachment: Figure 2-3).

- c. 94 LRS Warehouse: This proposed warehouse would occupy 4 acres of undeveloped land adjacent to the Base Exchange building, Vehicle Maintenance Facility, and Civil Engineering building. This building would accommodate LRS storage requirements within a consolidated facility configured to maximize space and efficiency. The facility footprint would be 56,295 square feet and the facility would have a reinforced concrete slab foundation (Attachment: Figure 2-4).
- d. Fitness Center: This building would be constructed adjacent to the extant running track on 6 acres of mostly wooded land. This facility would replace the existing fitness center to collocate fitness activities into a centralized area. The footprint of this facility would be 36,436 square feet (Attachment: Figure 2-5).

3. AREA OF POTENTIAL EFFECTS (APE): The APE includes the maximum footprint for the Proposed Action, comprising all construction, demolition, and staging areas as identified previously and depicted on Figures 2-1 through 2-5. Given the extensive development and built-up nature of the base, a separate indirect effects APE has not been established. Instead, the indirect effects APE is co-terminus with the direct effects APE because of the low likelihood that visual, audible, or atmospheric effects from the Proposed Action would occur to nearby resources.

4. PREVIOUSLY RECORDED CULTURAL RESOURCES: According to Dobbins ARB's Integrated Cultural Resources Management Plan (ICRMP) (Dobbins ARB, 2017), approximately 1,600 acres within Dobbins ARB has been surveyed for cultural resources, including the entirety of the APE. Approximately 66 acres of primarily developed, paved, or landscaped areas have not been surveyed. As a result of these previous surveys, no known archaeological, architectural, or Traditional Cultural Properties have been identified within the boundaries of the APE. The following provides additional information on these investigations:

- a. Archaeological Resources: Four archaeological resources have been identified at Dobbins ARB, comprising an agricultural trench, foundations for two different houses, and a prehistoric isolated find. None of these resources are listed in, or determined to be eligible for listing in, the National Register of Historic Places (NRHP).
- b. Architectural Resources: Dobbins ARB has been fully surveyed for architectural resources by a number of cultural resources studies. Building 510 was listed in the NRHP in 1994. In addition, the Big Lake Dam was evaluated as eligible for listing in the NRHP. No other architectural resources are listed in, or determined to be eligible for listing in, the NRHP.

5. CONCLUSIONS AND RECOMMENDATIONS: In accordance with the National Historic Preservation Act of 1966, as amended, and to ensure the effects of the Proposed Action on properties listed in, or eligible for listing in, the NRHP are accounted for, AFRC and Dobbins ARB are initiating Section 106 consultation with local tribes pursuant to 36 CFR Section 800.2.

- a. No significant archaeological or architectural resources are located within the APE. All identified cultural resources are located outside the APE boundaries, and the Proposed Action would not directly alter or modify any resources listed in, or determined eligible for listing in, the NRHP. Additionally, no indirect impacts would occur to Building 510 from the Proposed Action, because the proposed new facilities would be visually consistent with other nearby buildings, structures, and land uses at the base. The area surrounding Building 510 consists of modern facilities; therefore, the Proposed Action would not modify or diminish Building 510’s historic integrity aspects of location, design, feeling, setting, materials, or workmanship, or association
- b. No Traditional Cultural Properties, sacred sites, or sites of religious or cultural importance have been identified in the APE or its environs.
- c. In conclusion, the implementation of the Proposed Action will not directly or indirectly affect historic properties within the APE; therefore, we recommend a finding of **no historic properties affected** for this undertaking in accordance with 36 CFR Section 800.4(d).
- d. If any unanticipated discoveries of archaeological resources or “cultural items” subject to the provisions of the Native American Graves Protection and Repatriation Act (NAGPRA) occur during the implementation of the Proposed Action, work would be temporarily halted at the discovery site, the Dobbins ARB Installation Cultural Resources Manager would be contacted, and all appropriate measures would be implemented to avoid disturbance, as detailed in the ICRMP. Dobbins ARB would immediately inform you of the discovery and invite you to consult on the procedures to minimize adverse effects and/or render disposition of NAGPRA cultural items.

6. We respectfully request that you provide concurrence on the findings for this undertaking within 30 days of receipt of this letter. Please address questions or comments to Mr. Parker Johnson, 901 Industrial Drive, Building 510, Dobbins ARB, GA 30069, call Mr. Johnson at (678) 655-3549, or send email via [william.johnson.200@us.af.mil](mailto:william.johnson.200@us.af.mil). Thank you for your assistance.

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 WILLIAM C. POWELL, GS-12, DAF  
 Chief, Environmental Flight

Attachment:  
 Description of the Proposed Action and Alternatives

Note: The Description of the Proposed Action and Alternatives (DOPPA) was included in the letter but is not included in this appendix to avoid duplication with Sections 1 and 2 of the *Environmental Assessment for Construction Projects at Dobbins Air Reserve Base, Georgia*.



DEPARTMENT OF THE AIR FORCE  
AIR FORCE RESERVE COMMAND

4 May 2021

Brigadier General Craig McPike, USAF  
Commander  
94th Airlift Wing  
1430 First Street  
Building 838 Room 2105  
Dobbins ARB GA 30069

Chief Tarpie Yargee  
Alabama-Quassarte Tribal Town  
101 E Broadway Avenue  
Post Office Box 187  
Wetumka OK 74883

Dear Chief Yargee

The Air Force Reserve Command (AFRC) and Dobbins Air Reserve Base (ARB) are preparing an Environmental Assessment (EA) in accordance with the National Environmental Policy Act of 1969 (NEPA). The EA will analyze the potential impacts and environmental consequences associated with the construction and operation of four new facilities at Dobbins ARB in Cobb County, Georgia (Attachment: Figures 1-1 and 2-1). The EA will evaluate potential environmental consequences of the Proposed Action and alternatives in accordance with the provisions of the *Code of Federal Regulations* (CFR) Title 32, Part 989, and 40 CFR Parts 1500 through 1508 (Council on Environmental Quality's NEPA implementing regulations). We are seeking concurrence from your office regarding Dobbins ARB's determination of effects from the Proposed Action, pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended.

Dobbins ARB proposes to construct four new facilities at Dobbins ARB, comprising a new 622nd Civil Engineering Group (622 CEG) headquarters building, a 622 CEG training center, a Logistics Readiness Squadron (LRS) warehouse, and a fitness center.

- 622 CEG Headquarters: A new headquarters building would be constructed on 2 acres of wooded land adjacent to the existing 622 CEG classroom buildings, eliminating unnecessary vehicle traffic between administrative and training facilities. The proposed headquarters building would encompass 12,543 square feet (Attachment: Figure 2-2).
- 622 CEG Training Center: The training center would include a vehicle and equipment storage building, as well as training facility upgrades. The storage building would be constructed in the undeveloped area adjacent to the southeast end of the Dead

Runway and southeast of the aircraft fire training pit. Training in this area would include earth-moving activities using heavy equipment, such as bulldozers and backhoes operating on the southwest end of the Dead Runway or just north of Hull Place, southeast of the existing hangar (Building 1011) currently occupied by the U.S. Army Reserve. The footprint of the storage building would be 1,200 square feet and the building would sit on a 60,000-square-foot concrete pad (Attachment: Figure 2-3).

- 94 LRS Warehouse: This proposed warehouse would occupy 4 acres of undeveloped land adjacent to the Base Exchange building, Vehicle Maintenance Facility, and Civil Engineering building. This building would accommodate LRS storage requirements within a consolidated facility configured to maximize space and efficiency. The facility footprint would be 56,295 square feet and the facility would have a reinforced concrete slab foundation (Attachment: Figure 2-4).
- Fitness Center: This building would be constructed adjacent to the extant running track on 6 acres of mostly wooded land. This facility would replace the existing fitness center to collocate fitness activities into a centralized area. The footprint of this facility would be 36,436 square feet (Attachment: Figure 2-5).

The Area of Potential Effects (APE) includes the maximum footprint for the Proposed Action, comprising all construction, demolition, and staging areas as identified previously and depicted on Figures 2-1 through 2-5. Given the extensive development and built-up nature of the base, a separate indirect effects APE has not been established. Instead, the indirect effects APE is co-terminus with the direct effects APE because of the low likelihood that visual, audible, or atmospheric effects from the Proposed Action would occur to nearby resources.

According to Dobbins ARB's Integrated Cultural Resources Management Plan (ICRMP) (Dobbins ARB, 2017), approximately 1,600 acres within Dobbins ARB has been surveyed for cultural resources, including the entirety of the APE. Approximately 66 acres of primarily developed, paved, or landscaped areas have not been surveyed. As a result of these previous surveys, no known archaeological, architectural, or Traditional Cultural Properties have been identified within the boundaries of the APE. The following list provides additional information on these investigations:

- Archaeological Resources: Four archaeological resources have been identified at Dobbins ARB, comprised of an agricultural trench, foundations for two different houses, and a prehistoric isolated find. None of these resources are listed in or determined to be eligible for listing in the National Register of Historic Places (NRHP).
- Architectural Resources: Dobbins ARB has been fully surveyed for architectural resources by a number of cultural resources studies. Building 510 was listed in the NRHP in 1994. In addition, the Big Lake Dam was evaluated as eligible for listing in the NRHP. No other architectural resources are listed in, or determined to be eligible for listing in, the NRHP.

In accordance with the National Historic Preservation Act of 1966, as amended, and to ensure the effects of the Proposed Action on properties listed in, or eligible for listing in, the NRHP are accounted for, AFRC and Dobbins ARB are initiating Section 106 consultation with your tribe pursuant to 36 CFR Section 800.2.

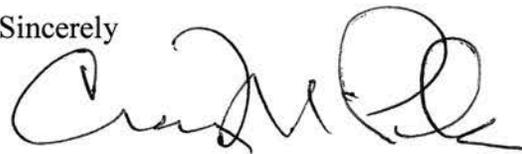
No significant archaeological or architectural resources are located within the APE. All identified cultural resources are located outside the APE boundaries, and the Proposed Action would not directly alter or modify any resources listed in, or determined eligible for listing in, the NRHP. Additionally, no indirect impacts would occur to Building 510 from the Proposed Action, because the proposed new facilities would be visually consistent with other nearby buildings, structures, and land uses at the base. The area surrounding Building 510 consists of modern facilities; therefore, the Proposed Action would not modify or diminish Building 510's historic integrity aspects of location, design, feeling, setting, materials, or workmanship, or association.

No Traditional Cultural Properties, sacred sites, or sites of religious or cultural importance have been identified in the APE or its environs. If your tribe has any special knowledge of such resources, please provide specific comments so that we can take measures to ensure that the project will avoid, minimize, or mitigate effects on such properties.

If any unanticipated discoveries of archaeological resources or "cultural items" subject to the provisions of the Native American Graves Protection and Repatriation Act (NAGPRA) occur during the implementation of the Proposed Action, work would be temporarily halted at the discovery site, the Dobbins ARB Installation Cultural Resources Manager would be contacted, and all appropriate measures would be implemented to avoid disturbance, as detailed in the ICRMP. Dobbins ARB would immediately inform you of the discovery and invite you to consult on the procedures to minimize adverse effects and/or render disposition of NAGPRA cultural items.

We would like to start these actions soon, so we request your feedback at your earliest convenience. If possible, please respond within 30 days of your receipt of this letter so that we have sufficient time to consider any information you provide. Please address questions or comments to Mr. Parker Johnson, 901 Industrial Drive, Building 510 Dobbins ARB, GA 30069, call Mr. Johnson at (678) 655-3549, or send email via [william.johnson.200@us.af.mil](mailto:william.johnson.200@us.af.mil). Thank you for your assistance.

Sincerely



CRAIG MCPIKE  
Brigadier General, USAF  
Commander, 94th Airlift Wing

Attachment:  
Description of the Proposed Action and Alternative

Note: The Description of the Proposed Action and Alternatives (DOPPA) was included in the letter but is not included in this appendix to avoid duplication with Sections 1 and 2 of the *Environmental Assessment for Construction Projects at Dobbins Air Reserve Base, Georgia*.



DEPARTMENT OF THE AIR FORCE  
AIR FORCE RESERVE COMMAND

4 May 2021

Brigadier General Craig McPike, USAF  
Commander  
94th Airlift Wing  
1430 First Street  
Building 838 Room 2105  
Dobbins ARB GA 30069

Chief William Harris  
Catawba Indian Nation  
611 East Main Street  
Rock Hill SC 29730

Dear Chief Harris

The Air Force Reserve Command (AFRC) and Dobbins Air Reserve Base (ARB) are preparing an Environmental Assessment (EA) in accordance with the National Environmental Policy Act of 1969 (NEPA). The EA will analyze the potential impacts and environmental consequences associated with the construction and operation of four new facilities at Dobbins ARB in Cobb County, Georgia (Attachment: Figures 1-1 and 2-1). The EA will evaluate potential environmental consequences of the Proposed Action and alternatives in accordance with the provisions of the *Code of Federal Regulations* (CFR) Title 32, Part 989, and 40 CFR Parts 1500 through 1508 (Council on Environmental Quality's NEPA implementing regulations). We are seeking concurrence from your office regarding Dobbins ARB's determination of effects from the Proposed Action, pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended.

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include earth-moving activities using heavy equipment, such as bulldozers and backhoes operating on the southwest end of the Dead Runway or just north of Hull Place, southeast of the existing hangar (Building 1011) currently occupied by the U.S. Army Reserve. The footprint of the storage building would be 1,200 square feet and the building would sit on a 60,000-square-foot concrete pad (Attachment: Figure 2-3).

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Sincerely



CRAIG MCPIKE  
Brigadier General, USAF  
Commander, 94th Airlift Wing

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DEPARTMENT OF THE AIR FORCE  
AIR FORCE RESERVE COMMAND

4 May 2021

Brigadier General Craig McPike, USAF  
Commander  
94th Airlift Wing  
1430 First Street  
Building 838 Room 2105  
Dobbins ARB GA 30069

Principal Chief Chuck Hoskin, Jr.  
Cherokee Nation  
WW Keeler Tribal Complex  
17675 S Muskogee Ave  
Tahlequah OK 74464

Dear Principal Chief Hoskin

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DEPARTMENT OF THE AIR FORCE  
AIR FORCE RESERVE COMMAND

4 May 2021

Brigadier General Craig McPike, USAF  
Commander  
94th Airlift Wing  
1430 First Street  
Building 838 Room 2105  
Dobbins ARB GA 30069

Principal Chief Richard Sneed  
Eastern Band of Cherokee Indians  
88 Council House Loop  
Cherokee NC 28719

Dear Principal Chief Sneed

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DEPARTMENT OF THE AIR FORCE  
AIR FORCE RESERVE COMMAND

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Brigadier General Craig McPike, USAF  
Commander  
94th Airlift Wing  
1430 First Street  
Building 838 Room 2105  
Dobbins ARB GA 30069

Chairman Stephanie A. Bryan  
Poarch Band of Creek Indians  
5811 Jack Springs Road  
Atmore AL 36502

Dear Chairman Bryan

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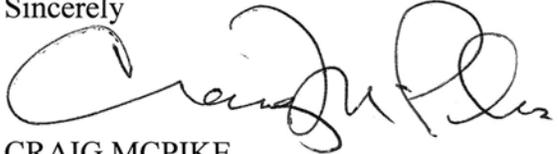
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Responses

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April 20, 2021

William C. Powell, GS-12. DAF  
Chief, Environmental Flight  
94 MSG/CEV  
901 Industrial Drive  
Dobbins Air Reserve Base, Georgia 30069  
**Attn: Parker Johnson**

**RE: Dobbins Air Reserve Base: Construct Four (4) Facilities, Marietta  
Cobb County, Georgia  
HP-210329-007**

Dear Mr. Powell:

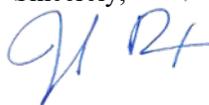
The Historic Preservation Division (HPD) has received the information submitted concerning the above referenced project. Our comments are offered to assist the US Department of the Air Force and Dobbins Air Reserve Base (ARB) in complying with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA). **In order to complete our review and concur with your determination of eligibility and effect, HPD is in need of additional information.**

The subject project consists of the construction of four (4) facilities for the 622<sup>nd</sup> Civil Engineering Group within Dobbins ARB, including a headquarters building, training center, warehouse, and fitness center. Based on the information provided, it is HPD's opinion that the project, as submitted, cannot be evaluated for effects to historic properties within its area of potential effects (APE). **The following information should be furnished in order for HPD to evaluate the proposed project:**

- Detail project scope of work/description and depth of ground disturbance(s) for each activity type and location, including project and site plans and elevations, if available.
- Justification and documentation of the area of potential effect (APE).
- Previous archaeological and historic resources surveys within or adjacent to project APEs and results of, and concurrence with, previously recorded archaeological sites and historic resources.
- Evaluations of additional historic properties that have not previously been evaluated or were evaluated under Criterion Consideration G.
- Photographs of the project areas and the historic properties within the APEs and maps indicating all of the applicable components above.

HPD also recommends consultation with federally recognized Tribal Nations that have ancestral homelands within the project area in order to determine the presence of Traditional Cultural Properties and sacred sites.

We look forward to reviewing the requested information and working with you as this project progresses. Please refer to project number **HP-210329-007** in any further correspondence regarding this project. If we may be of further assistance, please do not hesitate to contact me, at [Jennifer.dixon@dca.ga.gov](mailto:Jennifer.dixon@dca.ga.gov) or (404) 486-6376.

Sincerely,  


Jennifer Dixon, MHP, LEED Green Associate  
Program Manager  
Environmental Review & Preservation Planning



DEPARTMENT OF THE AIR FORCE  
AIR FORCE RESERVE COMMAND

25 May 2021

MEMORANDUM FOR: Mr. Christopher Nunn  
State Historic Preservation Officer  
Commissioner, Georgia Department of Community Affairs  
60 Executive Park South, NE  
Atlanta, GA 30329

FROM: 94 MSG/CE  
901 Industrial Drive  
Dobbins ARB, GA 30069

SUBJECT: Section 106 Consultation for Construction of Four Facilities at Dobbins Air Reserve Base, Cobb County, Georgia, **HP-210329-007**

1. The Air Force Reserve Command (AFRC) and Dobbins Air Reserve Base (ARB) are responding to the 20 April 2021 letter received from the Georgia Department of Community Affairs, Historic Preservation Department (HPD; Attachment 1), regarding Dobbins ARB's determination of eligibility and effects for the construction and operation of four new facilities at Dobbins ARB in Cobb County, Georgia (**HP-210329-007**). This project is being reviewed pursuant to Section 106 of the National Historic Preservation Act of 1966 (Section 106), as amended. The HPD requested that Dobbins ARB provide the following additional information to complete the Section 106 review of the undertaking.

2. **Detail project scope of work/description and depth of ground disturbance(s) for each activity and location, including project and site plans and elevations, if available.** The four project descriptions provided in the 5 March 2021 letter from Dobbins ARB to the HPD include the most up-to-date project information for the projects, which are in the early planning and design process stage (Attachment 1). The general project locations are shown in Attachment 2, Figures 1 and 2. Detailed plans for each of the project sites have not been developed; however, as shown in Attachment 2, Figures 3 through 6, the proposed location for each project is in a previously disturbed area. Based on a review of as-built water, electrical, gas, sewer, and stormwater utility plans for Dobbins ARB, up to 4 feet beneath the existing ground surface have been previously disturbed for utility development throughout the base. In addition, between 3 and 4 feet beneath the existing ground surface have been previously disturbed for road construction, grading and site clearance, and previous airfield development within portions of the area of potential effects (APE). The following provides more information on the existing disturbances in relation to project activities.

a. 622 Civil Engineering Group (CEG) Headquarters: The new headquarters is a proposed 12,543-square-foot building adjacent to existing classroom buildings, which were constructed circa 1960. Ground disturbance for the project is not expected to exceed 3 feet below ground surface for the foundation and 4 feet for utility connections. The project site is

currently a wooded area, but based on historic aerials, it was cleared and graded by 1955, which likely disturbed soil up to 3 feet below ground surface. Ridenour Drive, an existing roadway that has been widened and graded, is located along the south part of the building footprint. Existing utility infrastructure surround the building footprint.

- b. 622 CEG Training Center: The training center is proposed along the southeast end of the existing Dead Runway and existing aircraft fire training pit. This area has been heavily disturbed from the use of heavy mechanized equipment for training purposes and the construction and maintenance of the airfield, which disturbed 4 to 5 feet beneath the existing surface. Additionally, numerous recently constructed storage buildings, aircraft simulators, helicopter/car training equipment, and landmine and improvised explosive device detection canopy training facilities are located in this area. The training center is a proposed 1,200-square-foot building that would sit on a 60,000-square-foot concrete pad. Ground disturbance, which is not expected to exceed 3 feet below ground surface for the foundation and 4 feet for utility connections, would not occur in previously undisturbed soil due to the extensive development on the Dead Runway. No buildings or structures would be demolished as part of the project activities.
- c. 94 LRS Warehouse: The proposed warehouse is located at the western end of Industrial Drive, surrounded by the Base Exchange building, Vehicle Maintenance Facility, and Civil Engineering building, which were constructed within the past 35 to 40 years based on historic aerials. Although the project site is a wooded area, historic aerials indicate it had been cleared and graded by 1955, which likely disturbed up to 3 feet below ground surface. The existing utilities are 3 to 4 feet below ground surface and surround the project site. Ground disturbance for the project is not expected to exceed 3 feet below ground surface for the foundation and 4 feet for utility connections.
- d. Fitness Center: The proposed fitness center consists of a 36,436-square-foot building constructed adjacent to the extant running track. The eastern portion of the project site is a cleared area used as an electrical training area. There is no evidence to indicate that the western portion of the project site has been graded or cleared, but the project area was surveyed in 1994 by Science Applications International Corporation (SAIC), see Number 4 for details. Ground disturbance for the project is not expected to exceed 3 feet below ground surface for the foundation and 4 feet for utility connections.

**3. Justification and documentation of the area of potential effects (APE).** The APE for the project activities is shown in Attachment 2, Figures 3 through 6. As previously described in the 5 March 2021 letter from Dobbins ARB to the HPD, the APE includes the maximum footprint for the projects, comprising all construction, parking/driveways, demolition, and staging areas. The exact locations within the APE for the staging areas are unknown; however, the APE has been delineated large enough to include all possible staging area locations. Access roads would be limited to existing paved surfaces and, therefore, are not included in the APE.

Given the extensive development and built-up nature of the base, a separate indirect effects APE has not been established. According to the 2017 *Integrated Cultural Resources Management Plan* (ICRMP) for the base, no cultural resources previously determined eligible or listed in the

National Register of Historic Places (NRHP) are located in the APE. The only known cultural resources near the APE is Building 510 (Bankston Rock House), which is listed in the NRHP and located approximately 250 feet north of the proposed driveway area of the 94 LRS Warehouse, and over 600 feet north from the proposed building footprint. Since the proposed development would be consistent with the existing facilities throughout the heavily developed base, Building 510 is not included in the APE; there would be no changes to the building's character-defining features, setting, feeling, or historic narrative. The new construction would be visually consistent with the area's appearance, character, and designs. Additionally, most of the nearby buildings are less than 50 years of age. Overall, the indirect effects APE is co-terminus with the direct effects APE because of the low likelihood that visual, audible, or atmospheric effects from the undertaking would occur to nearby resources.

**4. Previous archaeological and historic resources surveys within or adjacent to project APEs and results of, and concurrence with, previously recorded archaeological sites and historic resources.** Attachment 3 includes a figure from the 2017 ICRMP that shows the entirety of the APE has been previously surveyed for archaeological resources. This survey was conducted by SAIC in 1994 and included a review of archival records to determine the possible location of historic and archaeological sites. Only two archaeological resources were identified during this survey and neither are located within or near the APE or determined eligible for listing in the NRHP. The two archaeological resources were identified as a former residence and agricultural feature. HPD concurred with this finding.

SAIC researchers determined that a large percentage of the land composing Dobbins ARB has been disturbed over the years. In addition to ground disturbances caused by twentieth century industrial and military use of the land, destructive farming practices were common. Prior to the land being taken over by the military in 1943, much of the soil has been disturbed for planting corn and cotton, the agricultural staples of historic Cobb County. Terracing the land in this hilly country was a common farming practice, which generally causes more disturbances than simple turnover of soil, as was the custom in flatlands.

In addition to the 1994 SAIC survey, six other archaeological surveys have been completed within the boundaries of Dobbins ARB between 1995 and 2012. In total, these other surveys identified one additional historic-era archaeological resource (a building foundation) and one prehistoric isolated find (an Archaic corner-notched cluster point). Neither of these resources are located in the APE or determined eligible for listing in the NRHP.

The APE has also been fully surveyed for architectural resources as part of several previously conducted investigations. These surveys were completed between 1994 and 2016. As mentioned previously, Building 510 (Bankston Rock House) is a NRHP-listed building approximately 250 feet north of the APE limits for the proposed 94 LRS Warehouse and over 600 feet north from the proposed building footprint. In addition, the Big Lake Dam is a NRHP-eligible structure approximately 1,800 feet south of the 94 LRS Warehouse. No other previously recorded cultural resources listed in or eligible for listing in the NRHP are located near the APE areas. Previously recorded cultural resources are depicted in Attachment 3.

**5. Evaluations of additional historic properties that have not been evaluated or were evaluated under Criterion Consideration G.** There are no extant buildings or structures within the APE with the exception of the 622 CEG Training Center, which contains Buildings 1011, 1012, 1013, 1014, 1028, 1031, 1038, 1048, and 1049 (Attachment 2, Figure 4). None of these buildings will be demolished as part of the project activities. According to the 2017 ICRMP, none of these buildings were evaluated as eligible for listing in the NRHP. The buildings consist of a collection of minor training and storage facilities that are less than 50 years of age. Based on a review of historic aerials and maps, the oldest buildings in this area are Buildings 1011, 1012, and 1013, which were constructed between 1974 and 1978. The rest of the buildings were added after 2007. As buildings constructed less than 50 years ago, none of these resources meet NRHP Criteria Consideration G as properties that have achieved significance within the past 50 years. Furthermore, they do not meet NRHP Criteria A, B, C, or D, since they do not have a direct association with any historic themes or events from the recent past associated with Dobbins ARB, the Cold War, or an association with significant leaders at the base. During the Cold War, Dobbins ARB was used as a manufacturing plant by Lockheed and for limited research and design; however, none of the buildings within the APE for the 622 CEG Training Center have a direct association with this event.

Therefore, no buildings and structures within the APE are listed or are eligible for listing in the NRHP, and no historic properties will be affected by the project.

**6. Photographs of the project areas and the historic properties within the APEs and maps indicating applicable components above.** Maps depicting the APE are included in Attachment 2 and photographs of the APE are included in Attachment 4.

**7. HPD also recommends consultation with federally recognized Tribal Nations that have ancestral homelands within the project area in order to determine the presence of Traditional Cultural Properties and sacred sites.** Dobbins ARB sent letters to the Alabama-Quasserte Tribe, Catawba Indian Nation, Cherokee Nation, Eastern Band of Cherokee Indians, and Poarch Band of Creek Indians on 5 May 2021 requesting information about Traditional Cultural Properties and sacred sites in or near the APE. To date, no responses have been received. Additionally the 2017 ICRMP did not identify Traditional Cultural Properties at Dobbins ARB.

8. In conclusion, the implementation of the Proposed Action will not directly or indirectly affect historic properties within the APE; therefore, we recommend a finding of **no historic properties affected** for this undertaking in accordance with *Code of Federal Regulations* Title 36, Section 800.4(d).

If any unanticipated discoveries of archaeological resources or “cultural items” subject to the provisions of the Native American Graves Protection and Repatriation Act (NAGPRA) occur during the implementation of the Proposed Action, work would be temporarily halted at the discovery site, the Dobbins ARB Installation Cultural Resources Manager would be contacted, and all appropriate measures would be implemented to avoid disturbance, as detailed in the ICRMP. Dobbins ARB would immediately inform you of the discovery and invite you to consult

on the procedures to minimize adverse effects and/or render disposition of NAGPRA cultural items.

9. We respectfully request that you provide concurrence on the findings for this undertaking within 15 days of receipt of this letter. Please address questions or comments to Mr. Parker Johnson, 901 Industrial Drive, Building 510, Dobbins ARB, GA 30069; call Mr. Johnson at (678) 655-3549; or send him an email via [william.johnson.200@us.af.mil](mailto:william.johnson.200@us.af.mil). Thank you for your assistance.

POWELL.WILLIAM.C.1030153312  
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WILLIAM C. POWELL, GS-12, DAF  
Chief, Environmental Flight

#### Attachments

1. HPD Letter (dated 20 April 2021)
2. Figures
3. Previous Surveys and Resources
4. Photographs

**Attachment 1**  
**HPD Letter**

April 20, 2021

William C. Powell, GS-12. DAF  
Chief, Environmental Flight  
94 MSG/CEV  
901 Industrial Drive  
Dobbins Air Reserve Base, Georgia 30069  
**Attn: Parker Johnson**

**RE: Dobbins Air Reserve Base: Construct Four (4) Facilities, Marietta  
Cobb County, Georgia  
HP-210329-007**

Dear Mr. Powell:

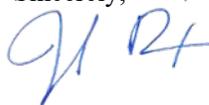
The Historic Preservation Division (HPD) has received the information submitted concerning the above referenced project. Our comments are offered to assist the US Department of the Air Force and Dobbins Air Reserve Base (ARB) in complying with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA). **In order to complete our review and concur with your determination of eligibility and effect, HPD is in need of additional information.**

The subject project consists of the construction of four (4) facilities for the 622<sup>nd</sup> Civil Engineering Group within Dobbins ARB, including a headquarters building, training center, warehouse, and fitness center. Based on the information provided, it is HPD's opinion that the project, as submitted, cannot be evaluated for effects to historic properties within its area of potential effects (APE). **The following information should be furnished in order for HPD to evaluate the proposed project:**

- Detail project scope of work/description and depth of ground disturbance(s) for each activity type and location, including project and site plans and elevations, if available.
- Justification and documentation of the area of potential effect (APE).
- Previous archaeological and historic resources surveys within or adjacent to project APEs and results of, and concurrence with, previously recorded archaeological sites and historic resources.
- Evaluations of additional historic properties that have not previously been evaluated or were evaluated under Criterion Consideration G.
- Photographs of the project areas and the historic properties within the APEs and maps indicating all of the applicable components above.

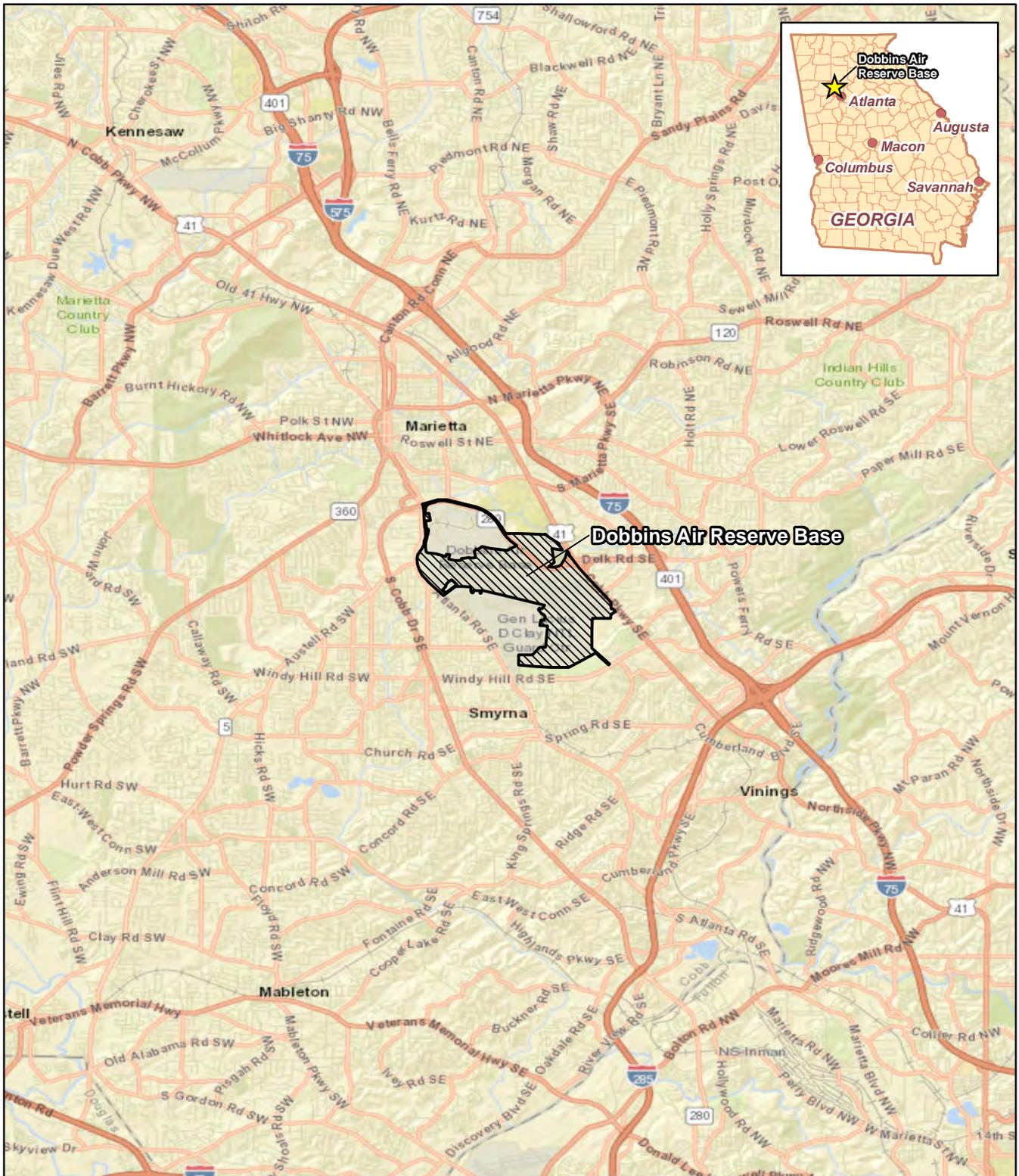
HPD also recommends consultation with federally recognized Tribal Nations that have ancestral homelands within the project area in order to determine the presence of Traditional Cultural Properties and sacred sites.

We look forward to reviewing the requested information and working with you as this project progresses. Please refer to project number **HP-210329-007** in any further correspondence regarding this project. If we may be of further assistance, please do not hesitate to contact me, at Jennifer.dixon@dca.ga.gov or (404) 486-6376.

Sincerely,  


Jennifer Dixon, MHP, LEED Green Associate  
Program Manager  
Environmental Review & Preservation Planning

**Attachment 2**  
**Figures**



**Legend**

 Dobbins Air Reserve Base

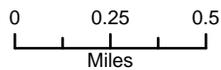


**Figure 1**  
**Vicinity Map**  
 Dobbins Air Reserve Base, Georgia



**Legend**

-  Dobbins Air Reserve Base
-  Area of Potential Effects

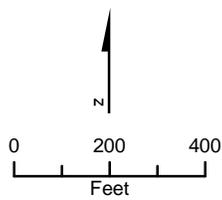


**Figure 2**  
**General Location Map**  
 Dobbins Air Reserve Base, Georgia



**Legend**

-  Dobbins Air Reserve Base
-  Area of Potential Effects

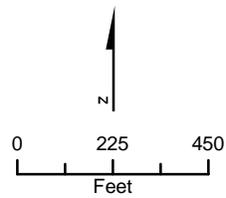


**Figure 3**  
**Proposed Project Area**  
**622 CEG Headquarters Building**  
Dobbins Air Reserve Base, Georgia



**Legend**

- Dobbins Air Reserve Base
- Area of Potential Effects

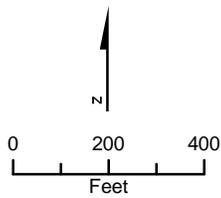


**Figure 4**  
**Proposed Project Area**  
**622 CEG Training Center**  
 Dobbins Air Reserve Base, Georgia



**Legend**

-  Dobbins Air Reserve Base
-  Area of Potential Effects
-  Building 510 (Bankston Rock House)

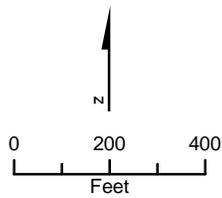


**Figure 5**  
**Proposed Project Area**  
**94 LRS Warehouse**  
 Dobbins Air Reserve Base, Georgia



**Legend**

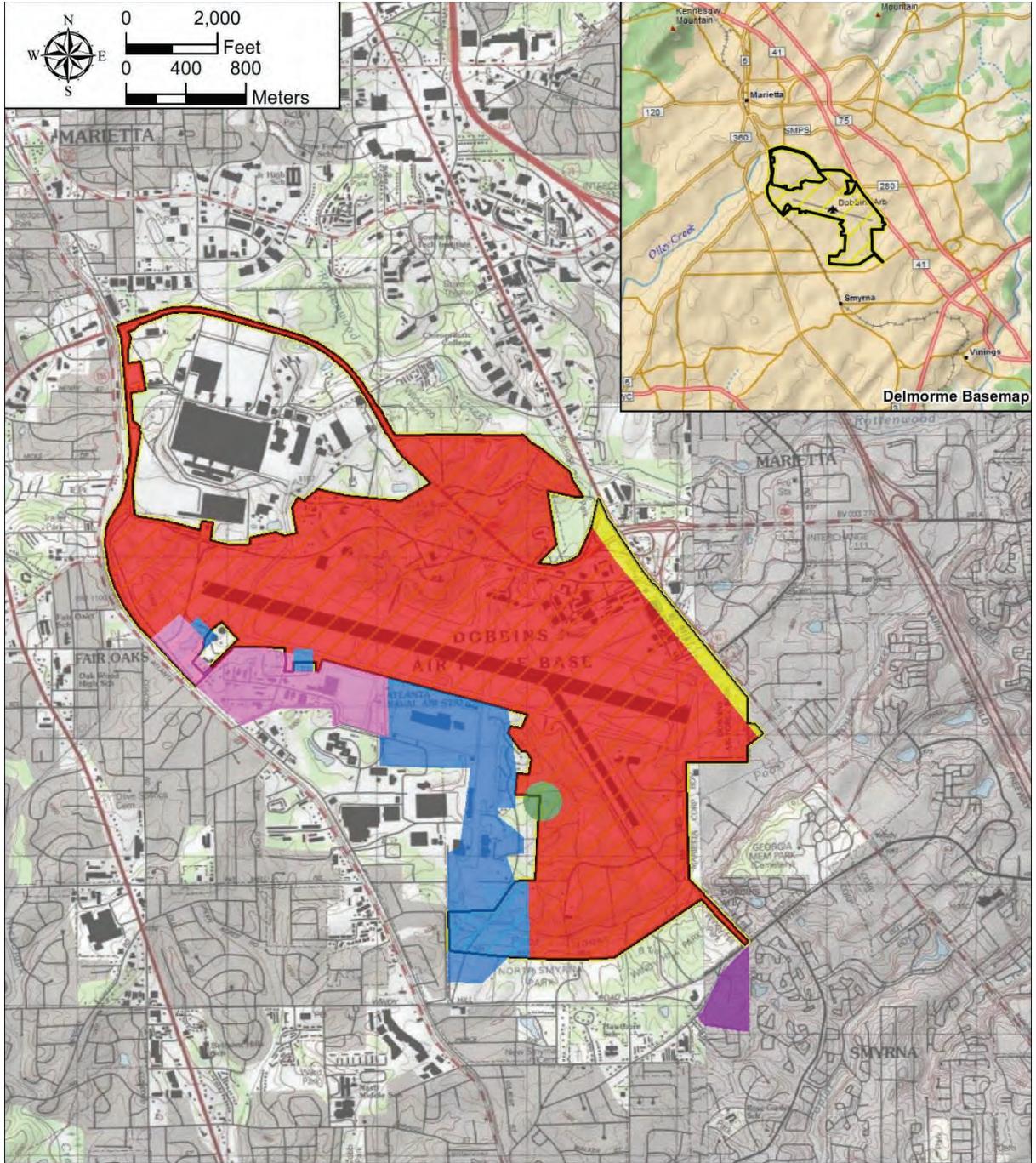
- Dobbins Air Reserve Base
- Area of Potential Effects



**Figure 6**  
**Proposed Project Area**  
**Fitness Center**  
 Dobbins Air Reserve Base, Georgia

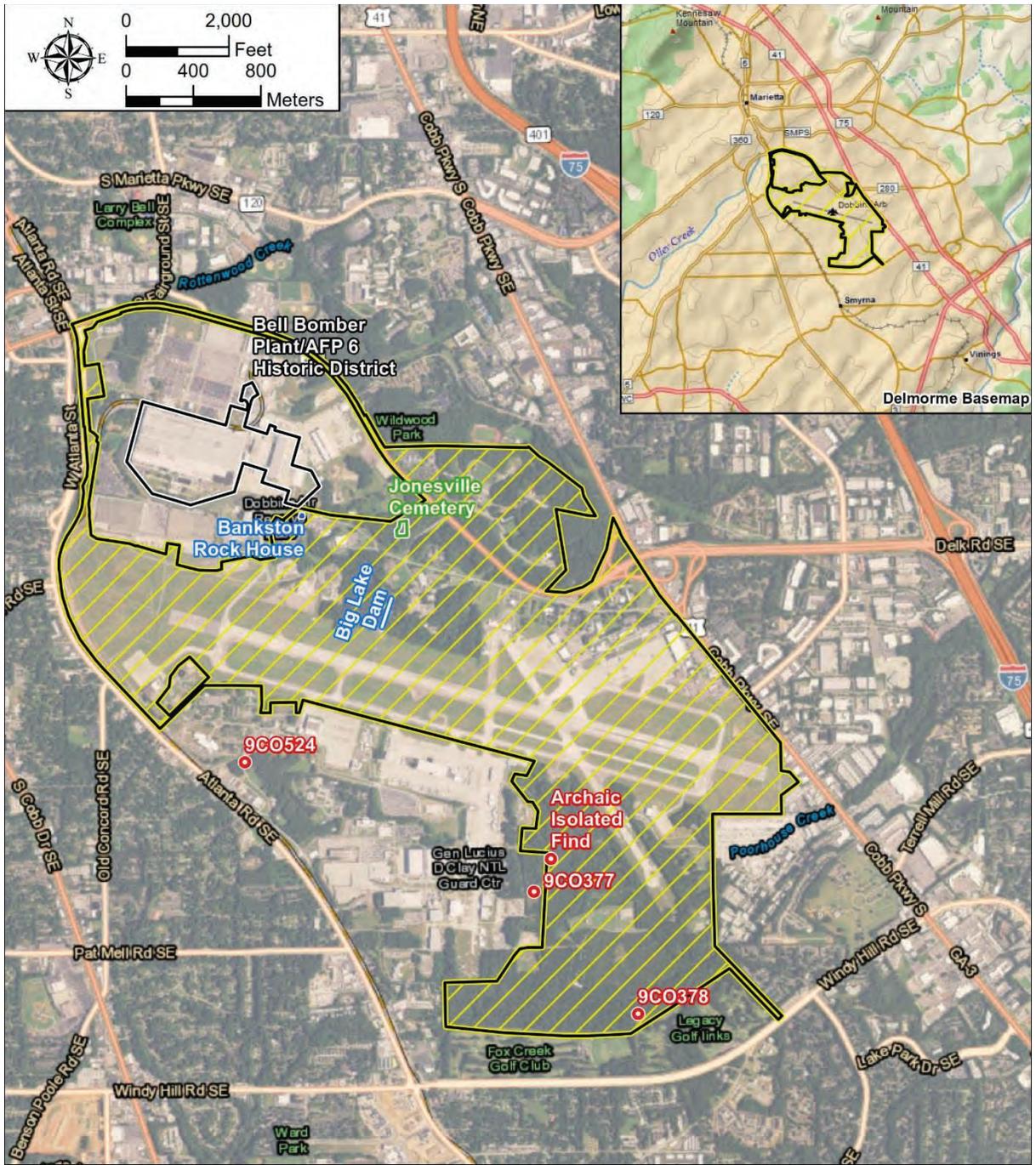
**Attachment 3**  
**Previous Surveys and Resources**

INTEGRATED CULTURAL RESOURCES MANAGEMENT PLAN



	Dobbins Air Reserve Base	MAP BY: daniel.conn	<b>LEGEND: Previously Surveyed Area</b> Brockington 2000 Brockington 2007 Earth Tech 1995 Edwards-Pitman 2005 SAIC 1994 SEARCH 2012 Installation Boundary	TIME: 11:57:22 AM
		CHK'D BY: DB		DATE: 5/18/2017
Amec Foster Wheeler Environment & Infrastructure 690 Commonwealth Center 11003 Bluegrass Parkway Louisville, KY 40299		DATUM: WGS 1984	PROJECT #: 775687002	
		PROJECTION: WGS 1984 UTM Zone 18N		
Surveys		SCALE: 1 in=3,000 ft	Imagery: USGS TOPO 24k - Marietta, GA - 1984	

Figure J-15. Previous Cultural Resources Surveys at Dobbins ARB.



 U.S. AIR FORCE	Dobbins Air Reserve Base	MAP BY: daniel.conn	<b>LEGEND:</b> ● Archaeological Sites  Big Lake Dam (NRHP Eligible)  Bell Bomber Plant/AFP 6 Historic District  Jonesville Cemetery  Building 510 (Bankston Rock House – NRHP Listed)  Installation Boundary	TIME: 11:58:32 AM
		CHK'D BY: DB		DATE: 5/18/2017
Amec Foster Wheeler Environment & Infrastructure 690 Commonwealth Center 11003 Bluegrass Parkway Louisville, KY 40299	 amec foster wheeler	DATUM: WGS 1984	PROJECT #: 775687002	
		PROJECTION: WGS 1984 UTM Zone 18N		
		SCALE: 1 in = 2,667 ft		

Sites

Imagery: USGS TOPO 24k - Marietta, GA - 1984

Figure J- 16 Cultural Resources at Dobbins ARB.

**Attachment 4**  
**Photographs**



Photograph 1. View of the proposed 622 CEG Training Area, looking northwest.



Photograph 2. View of the proposed 622 CEG Training Area, looking north.



Photograph 3. View (from left) of Buildings 1048, 1028, and 1049 within proposed 622 CEG Training Area, looking east.



Photograph 4. View of the proposed 622 CEG Headquarters location and existing classroom buildings, looking east.



Photograph 5. View of the proposed 622 CEG Headquarters location, looking west.



Photograph 6. View of the proposed LRS Warehouse location, looking south.



Photograph 7. View of the proposed Fitness Center, looking southwest.



Photograph 8. View of existing electrical training area within the proposed Fitness Center, looking east.

## Hollins, Jeremy/SDO

---

**Subject:** FW: Dobbins ARB: Construction of 4 facilities, Marietta, Cobb Co, HP 210329-007

**From:** Jennifer Dixon <[Jennifer.Dixon@dca.ga.gov](mailto:Jennifer.Dixon@dca.ga.gov)>

**Sent:** Tuesday, June 1, 2021 2:57 PM

**To:** JOHNSON, WILLIAM P GS-12 USAF AFRC 94 CE/CEV <[william.johnson.200@us.af.mil](mailto:william.johnson.200@us.af.mil)>

**Subject:** [Non-DoD Source] Dobbins ARB: Construction of 4 facilities, Marietta, Cobb Co, HP 210329-007

Hey Parker,

Hope you are doing well and had a nice long weekend. I have done a cursory review of the additional information provided and we have a few concerns. Archaeology is still reviewing, so their may be additional concerns added to the below.

- 1) The APE should be based on the project activities, once determined, then the setting is taken into account when determining if there is anything historic in the APE. As such, new construction should have an APE that includes nearby properties that may have an indirect effect, including visual.
- 2) Demo of structures is not the only potential impact; as indicated above, visual impacts are also a concern.
- 3) It is noted that the headquarters building is being constructed by classroom buildings that were constructed in 1960, which appear to be in the APE. However, there is no discussion of their eligibility or assessment of impacts to them considering they are over 50 years of age.
- 4) While the training center notes that all buildings in the APE (both direct and indirect) are less than 50 years old (therefore not historic and no need to assess) and the warehouse notes that all buildings in the APE (both direct and indirect) are less than 40 years old (and again, don't need to be assessed), it does not note what buildings are in the fitness center APE (age/elig of track and related structures?).
- 5) Also at the warehouse, the Rock House appears to be within the APE since there could be visual impacts to the building and it should be assessed as such (of course, with existing modern intrusions, it would appear to be no adverse effect, but it is unclear the height, materials, etc. of the new construction to know for sure).

Considering the above, we are unable to comment on the proposed project without additional information. Please let me know if you have any questions. Thank you,

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### Jennifer Dixon

Environmental Review and Preservation Planning Program Manager  
Georgia Department of Community Affairs  
60 Executive Park South, NE  
Atlanta, Georgia 30329

Direct 4044866376  
[Jennifer.Dixon@dca.ga.gov](mailto:Jennifer.Dixon@dca.ga.gov)



DEPARTMENT OF THE AIR FORCE  
AIR FORCE RESERVE COMMAND

27 July 2021

MEMORANDUM FOR: Mr. Christopher Nunn  
State Historic Preservation Officer  
Commissioner, Georgia Department of Community Affairs  
60 Executive Park South, NE  
Atlanta, GA 30329

FROM: 94 MSG/CE  
901 Industrial Drive  
Dobbins ARB, GA 30069

SUBJECT: Section 106 Consultation for Construction of Four Facilities at Dobbins Air Reserve Base, Cobb County, Georgia, **HP-210329-007**

1. The Air Force Reserve Command (AFRC) and Dobbins Air Reserve Base (ARB) are responding to the 01 June 2021 email received from the Georgia Department of Community Affairs, Historic Preservation Department (HPD; Attachment 1) and the 15 June 2021 conference call with the HPD regarding Dobbins ARB's determination of eligibility and effects for the construction and operation of four new facilities at Dobbins ARB in Cobb County, Georgia (**HP-210329-007**). This project is being reviewed pursuant to Section 106 of the National Historic Preservation Act of 1966 (Section 106), as amended. The HPD requested that Dobbins ARB provide the following additional information to complete the Section 106 review of the undertaking.

2. **Identification and justification of the indirect area of potential effects (APE).** The direct and indirect APEs for the project activities are shown in Attachment 2, Figures 1 through 4. The APE previously described in the 05 March 2021 letter from Dobbins ARB to the HPD is now identified as the direct APE, which includes the maximum footprint for the projects, comprising all construction, parking/driveways, demolition, and staging areas. As previously described, the exact locations within the APE for the staging areas are unknown; however, the APE has been delineated large enough to include all possible staging area locations within the direct APE. Access roads would be limited to existing paved surfaces and, therefore, are not included in the direct APE. The indirect APE for each project area is described and justified below. Generally, the indirect APE includes adjacent clusters of buildings and structures surrounding the direct APE that share a visual relationship with the project improvement areas.

a. 622 Civil Engineering Group (CEG) Headquarters: The indirect APE for the 622 CEG Headquarters Building includes a cluster of classroom facilities east of the proposed project area along Ridenour Drive and a lodging building south of the direct APE across Ridenour Drive (Attachment 2, Figure 2-1). The indirect APE was developed to assess visual, audible, or atmospheric effects on nearby resources, if such resources are determined to exist.

- b. 622 CEG Training Center: The indirect APE for the 622 CEG Training Center covers the land and roadways adjacent to the direct APE to assess visual, audible, or atmospheric effects on nearby resources, if such resources are determined to exist. Notably, there are no extant buildings or structures within the indirect APE for the 622 CEG Training Center (Attachment 2, Figure 2-2).
- c. 94 Logistics Readiness Squadron (LRS) Warehouse: The indirect APE for the 94 LRS Warehouse covers six administrative and maintenance buildings immediately adjacent to the direct APE (Attachment 2, Figure 2-3). The indirect APE was developed to assess visual, audible, or atmospheric effects on nearby resources, if such resources are determined to exist.
- d. Fitness Center: The indirect APE for the Fitness Center covers the existing track and three buildings south of the track (Attachment 2, Figure 2-4). The indirect APE was developed to assess visual, audible, or atmospheric effects on nearby resources, if such resources are determined to exist.

**3. Provide information on past eligibility determinations and complete streamlined eligibility determinations.** Information on past eligibility determinations and present eligibility determinations for extant buildings within the direct and indirect APEs is provided below.

- a. 622 CEG Headquarters: No extant buildings or structures are within the direct APE for the 622 CEG Headquarters. Nine buildings are located within the indirect APE: Buildings 401, 460, 461, 463, 466, 467, 468, 469, and 470 (Attachment 2, Figure 2-1). The buildings consist of a collection of eight classroom and educational facilities that are less than 50 years of age and one building used for lodging (Building 401) built in 1956. As shown on Figure 2-1, the classroom buildings within the indirect APE were built between 2016 and 2017. As such, the buildings have not been previously evaluated. Further, as buildings constructed less than 50 years ago, none of these resources meet National Register of Historic Places (NRHP) Criteria Consideration G as properties that have achieved significance within the past 50 years. According to the 2017 *Integrated Cultural Resources Management Plan* (ICRMP) for the base, Building 401 was previously evaluated not eligible for listing in the NRHP in 2006. However, Table J-3 in Appendix J of the Dobbins ARB ICRMP identifies Building 401 as “to be reassessed as Cold War Structure.” Building 401 would not be eligible for listing in the NRHP because it is not directly associated with major Cold War themes, such as advancements in research and design, significant individual or major events that would reflect the importance of the Cold War in Georgia. During the Cold War, Dobbins ARB was used as a manufacturing plant by Lockheed and for limited research and design; however, Building 401 does not have a direct association with this event.
- b. 622 CEG Training Center: The direct APE includes Buildings 1011, 1014, 1028, 1031, 1038, 1048, and 1049 (Attachment 2, Figure 2-2). None of these buildings will be demolished as part of the project activities. According to the 2017 ICRMP, none of these buildings were evaluated as eligible for listing in the NRHP. The buildings consist of a collection of minor training and storage facilities that are less than 50 years of age. Based on a review of historical aerials and maps, the oldest building in this area is Building 1011, which was constructed between 1974 and 1978. The rest of the buildings were added after 2007. As

buildings constructed less than 50 years ago, none of these resources meet NRHP Criteria Consideration G as properties that have achieved significance within the past 50 years. Furthermore, they do not meet NRHP Criteria A, B, C, or D because they do not have a direct association with any historic themes or events from the recent past associated with Dobbins ARB, the Cold War, or an association with significant leaders at the base. No buildings or structures are located within the indirect APE.

- c. 94 LRS Warehouse: No extant buildings or structures are within the direct APE for the 94 LRS Warehouse. Six buildings are located within the indirect APE: Buildings 501, 510, 511, 516, 518, and 530 (Attachment 2, Figure 2-3). The buildings consist of administrative and maintenance buildings that are less than 50 years of age and the Bankston Rock House (Building 510) built in 1939. As shown on Figure 2-3, the administrative and maintenance buildings within the indirect APE were built between 1973 and 1997. As buildings constructed less than 50 years ago, they do not meet NRHP Criteria Consideration G as properties that have achieved significance within the past 50 years. Furthermore, they do not meet NRHP Criteria A, B, C, or D because they do not have a direct association with any historic themes or events from the recent past associated with Dobbins ARB, the Cold War, or an association with significant leaders at the base. The Bankston Rock House (Building 510) was listed in the NRHP in 1994 under Criterion C as an exceptional example of a residence with stone masonry construction.
- d. Fitness Center: No extant buildings or structures are within the direct APE for the Fitness Center. The east part of the direct APE includes several storage containers used as an electrical training areas. Three buildings are located within the indirect APE: Buildings 410, 415, and 420, along with a running track (Attachment 2, Figure 2-4). According to the 2017 ICRMP, all of these buildings were constructed in 1990 and were not identified as eligible for listing in the NRHP. The running track was constructed within the past 20 years. As resources constructed less than 50 years ago, none of these resources meet NRHP Criteria Consideration G as properties that have achieved significance within the past 50 years. Furthermore, they do not meet NRHP Criteria A, B, C, or D because they do not have a direct association with any historic themes or events from the recent past associated with Dobbins ARB, the Cold War, or an association with significant leaders at the base.

**4. Provide summary of effects.** Attachment 3 contains photographs of the direct and indirect APEs for each proposed project area. A summary of effects for extant buildings within the direct and indirect APEs is provided for each project area is provided below.

- a. 622 CEG Headquarters: Building 401 is the only property constructed more than 45 years ago in the APE. While Building 401 is not eligible for listing in the NRHP, photographs of the indirect APE included in Attachment 3 demonstrate that the proposed 622 CEG Headquarters Building will have little to no visual effects on Building 401, which is not visible from the proposed project area because of dense foliage. Therefore, because no buildings or structures within the direct or indirect APEs are listed or are eligible for listing in the NRHP, no historic properties will be affected by the project. Further, Photographs 1 through 4 in Attachment 3 capture the direct and indirect APEs and demonstrate the low

likelihood that visual, audible, or atmospheric effects from the undertaking would occur to nearby resources.

- b. 622 CEG Training Center: As outlined in Section 3, no buildings or structures within the direct or indirect APEs are listed or are eligible for listing in the NRHP; therefore, no historic properties will be affected by the project.
- c. 94 LRS Warehouse: As outlined in Section 3, no buildings or structures within the direct APE are listed or are eligible for listing in the NRHP; however, one building within the indirect APE, the Bankston Rock House, is listed in the NRHP. Photographs 5 through 14 in Attachment 3 capture the proposed project area and indirect APE, including the Bankston Rock House, and demonstrate the low likelihood that visual, audible, or atmospheric effects from the undertaking would occur to nearby resources. Since the proposed development would be consistent with the existing facilities throughout the heavily developed base, there would be no changes to the Bankston Rock House's character-defining features, setting, feeling, or historic narrative. The proposed warehouse is expected to be no taller than two stories with a massing, design, and materials consistent with the base and Air Force design guidelines. The new construction would be visually compatible with the area's appearance, character, and design. The portion of the direct APE closest to the historic property would consist of a driveway that would not diminish or modify its extant historic integrity aspects of location, design, materials, feeling, setting, association, or workmanship. Therefore, no historic properties will be affected by the project.
- d. Fitness Center: As outlined in Section 3, no buildings or structures within the direct or indirect APEs are listed or are eligible for listing in the NRHP; therefore, no historic properties will be affected by the project. Further, Photographs 15 through 21 in Attachment 3 capture the proposed project area and indirect APE and demonstrate the low likelihood that visual, audible, or atmospheric effects from the undertaking would occur. The Fitness Center is not expected to be taller than two stories with a massing, design, and materials consistent with the base and Air Force design guidelines.

**5. Photographs of the project areas and the historic properties within the indirect APEs and maps indicating applicable components above.** As previously described, maps depicting the direct and indirect APEs are included in Attachment 2, Figures 1 through 4, and photographs of the proposed projects areas and indirect APEs are included in Attachment 3.

6. In conclusion, the implementation of the Proposed Action will not directly or indirectly affect historic properties within the direct or indirect APEs; therefore, we recommend a finding of **no historic properties affected** for this undertaking in accordance with *Code of Federal Regulations* Title 36, Section 800.4(d).

If any unanticipated discoveries of archaeological resources or "cultural items" subject to the provisions of the Native American Graves Protection and Repatriation Act (NAGPRA) occur during the implementation of the Proposed Action, work would be temporarily halted at the discovery site, the Dobbins ARB Installation Cultural Resources Manager would be contacted, and all appropriate measures would be implemented to avoid disturbance, as detailed in the

ICRMP. Dobbins ARB would immediately inform you of the discovery and invite you to consult on the procedures to minimize adverse effects and/or render disposition of NAGPRA cultural items.

7. We respectfully request that you provide concurrence on the findings for this undertaking within 15 days of receipt of this letter. Please address questions or comments to Mr. Parker Johnson, 901 Industrial Drive, Building 510, Dobbins ARB, GA 30069; call Mr. Johnson at (678) 655-3549; or send him an email via [william.johnson.200@us.af.mil](mailto:william.johnson.200@us.af.mil). Thank you for your assistance.

POWELL.WILLI  
AM.C.10301533  
12

Digitally signed by  
POWELL.WILLIAM.C.10301  
53312  
Date: 2021.07.28 13:07:26  
-04'00'

WILLIAM C. POWELL, GS-12, DAF  
Chief, Environmental Flight

Attachments

- 1. HPD Correspondence (dated 20 April 2021 and 01 June 2021)
- 2. Figures
- 3. Photographs

**Attachment 1**  
**HPD Correspondence**

## Hollins, Jeremy/SDO

---

**Subject:** FW: Dobbins ARB: Construction of 4 facilities, Marietta, Cobb Co, HP 210329-007

**From:** Jennifer Dixon <[Jennifer.Dixon@dca.ga.gov](mailto:Jennifer.Dixon@dca.ga.gov)>

**Sent:** Tuesday, June 1, 2021 2:57 PM

**To:** JOHNSON, WILLIAM P GS-12 USAF AFRC 94 CE/CEV <[william.johnson.200@us.af.mil](mailto:william.johnson.200@us.af.mil)>

**Subject:** [Non-DoD Source] Dobbins ARB: Construction of 4 facilities, Marietta, Cobb Co, HP 210329-007

Hey Parker,

Hope you are doing well and had a nice long weekend. I have done a cursory review of the additional information provided and we have a few concerns. Archaeology is still reviewing, so their may be additional concerns added to the below.

- 1) The APE should be based on the project activities, once determined, then the setting is taken into account when determining if there is anything historic in the APE. As such, new construction should have an APE that includes nearby properties that may have an indirect effect, including visual.
- 2) Demo of structures is not the only potential impact; as indicated above, visual impacts are also a concern.
- 3) It is noted that the headquarters building is being constructed by classroom buildings that were constructed in 1960, which appear to be in the APE. However, there is no discussion of their eligibility or assessment of impacts to them considering they are over 50 years of age.
- 4) While the training center notes that all buildings in the APE (both direct and indirect) are less than 50 years old (therefore not historic and no need to assess) and the warehouse notes that all buildings in the APE (both direct and indirect) are less than 40 years old (and again, don't need to be assessed), it does not note what buildings are in the fitness center APE (age/elig of track and related structures?).
- 5) Also at the warehouse, the Rock House appears to be within the APE since there could be visual impacts to the building and it should be assessed as such (of course, with existing modern intrusions, it would appear to be no adverse effect, but it is unclear the height, materials, etc. of the new construction to know for sure).

Considering the above, we are unable to comment on the proposed project without additional information. Please let me know if you have any questions. Thank you,

---



Learn more about our commitment to [fair housing](#).



### Jennifer Dixon

Environmental Review and Preservation Planning Program Manager  
Georgia Department of Community Affairs  
60 Executive Park South, NE  
Atlanta, Georgia 30329

Direct 4044866376  
[Jennifer.Dixon@dca.ga.gov](mailto:Jennifer.Dixon@dca.ga.gov)

April 20, 2021

William C. Powell, GS-12. DAF  
Chief, Environmental Flight  
94 MSG/CEV  
901 Industrial Drive  
Dobbins Air Reserve Base, Georgia 30069  
**Attn: Parker Johnson**

**RE: Dobbins Air Reserve Base: Construct Four (4) Facilities, Marietta  
Cobb County, Georgia  
HP-210329-007**

Dear Mr. Powell:

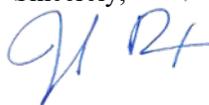
The Historic Preservation Division (HPD) has received the information submitted concerning the above referenced project. Our comments are offered to assist the US Department of the Air Force and Dobbins Air Reserve Base (ARB) in complying with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA). **In order to complete our review and concur with your determination of eligibility and effect, HPD is in need of additional information.**

The subject project consists of the construction of four (4) facilities for the 622<sup>nd</sup> Civil Engineering Group within Dobbins ARB, including a headquarters building, training center, warehouse, and fitness center. Based on the information provided, it is HPD's opinion that the project, as submitted, cannot be evaluated for effects to historic properties within its area of potential effects (APE). **The following information should be furnished in order for HPD to evaluate the proposed project:**

- Detail project scope of work/description and depth of ground disturbance(s) for each activity type and location, including project and site plans and elevations, if available.
- Justification and documentation of the area of potential effect (APE).
- Previous archaeological and historic resources surveys within or adjacent to project APEs and results of, and concurrence with, previously recorded archaeological sites and historic resources.
- Evaluations of additional historic properties that have not previously been evaluated or were evaluated under Criterion Consideration G.
- Photographs of the project areas and the historic properties within the APEs and maps indicating all of the applicable components above.

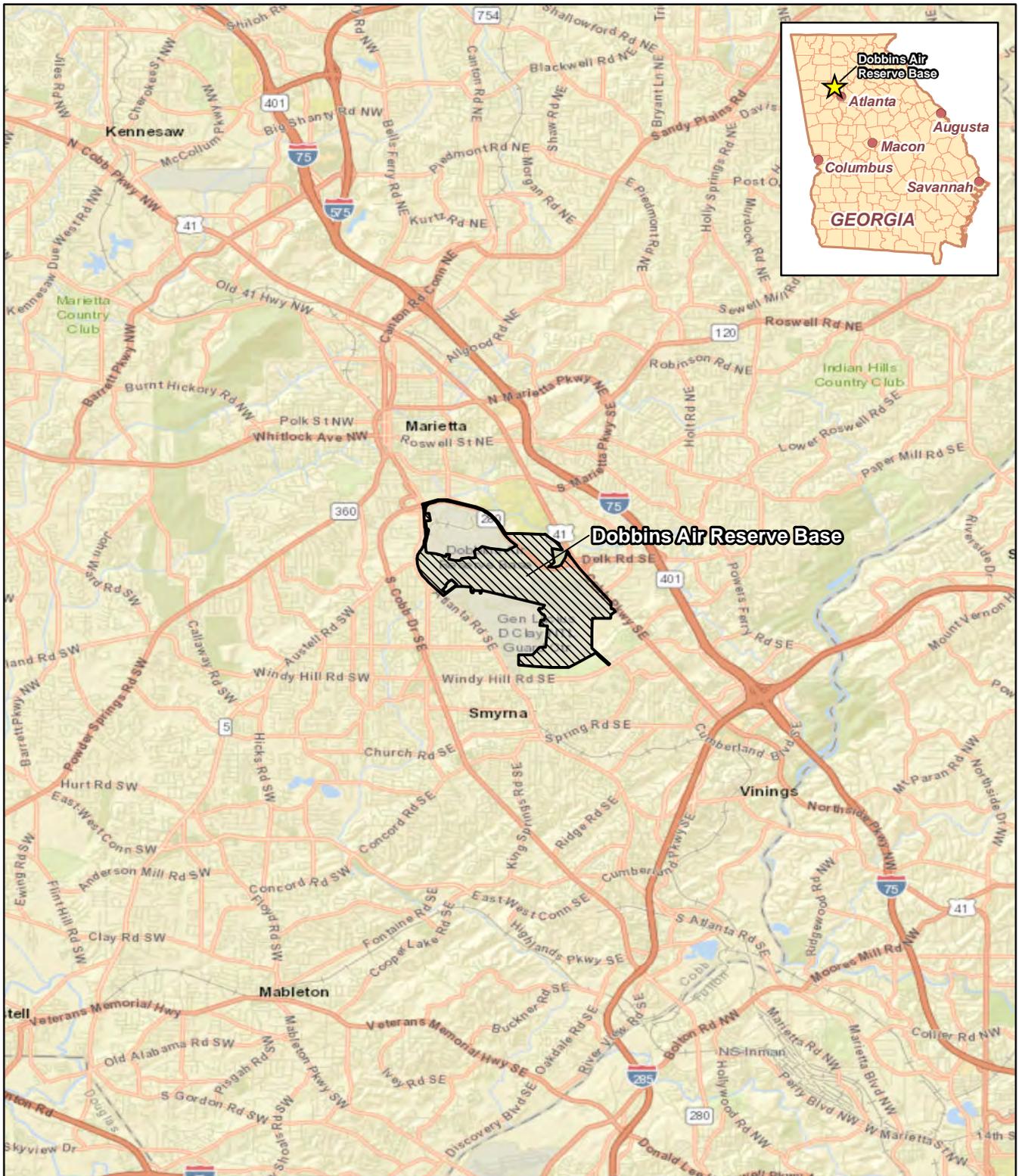
HPD also recommends consultation with federally recognized Tribal Nations that have ancestral homelands within the project area in order to determine the presence of Traditional Cultural Properties and sacred sites.

We look forward to reviewing the requested information and working with you as this project progresses. Please refer to project number **HP-210329-007** in any further correspondence regarding this project. If we may be of further assistance, please do not hesitate to contact me, at [Jennifer.dixon@dca.ga.gov](mailto:Jennifer.dixon@dca.ga.gov) or (404) 486-6376.

Sincerely,  


Jennifer Dixon, MHP, LEED Green Associate  
Program Manager  
Environmental Review & Preservation Planning

**Attachment 2**  
**Figures**



**Legend**

 Dobbins Air Reserve Base

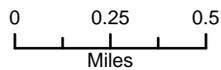


**Figure 1-1**  
**Vicinity Map**  
 Dobbins Air Reserve Base, Georgia

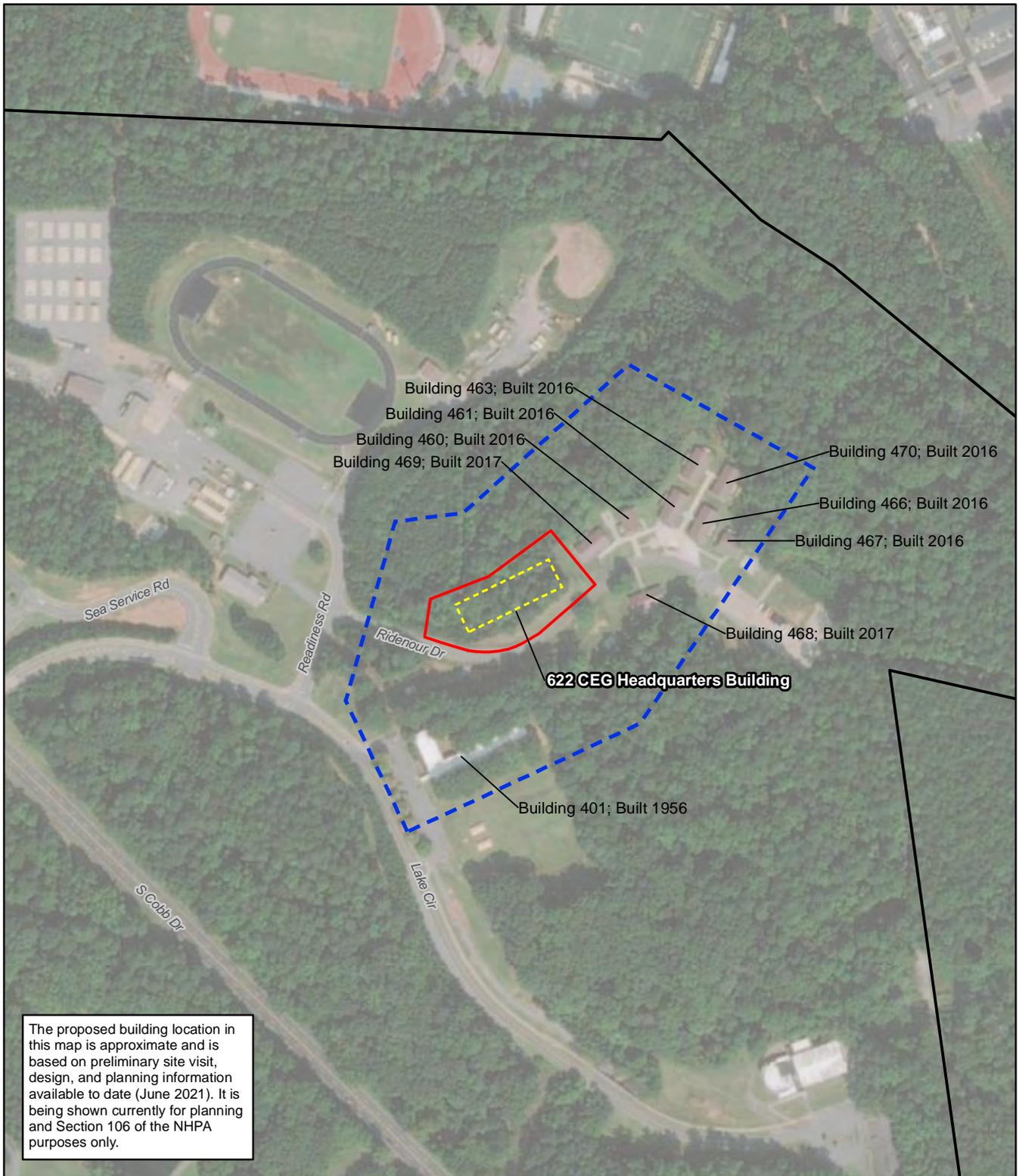


**Legend**

- Dobbins Air Reserve Base
- Area of Potential Effects

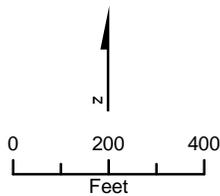


**Figure 1-2**  
**General Location Map**  
 Dobbins Air Reserve Base, Georgia



**Legend**

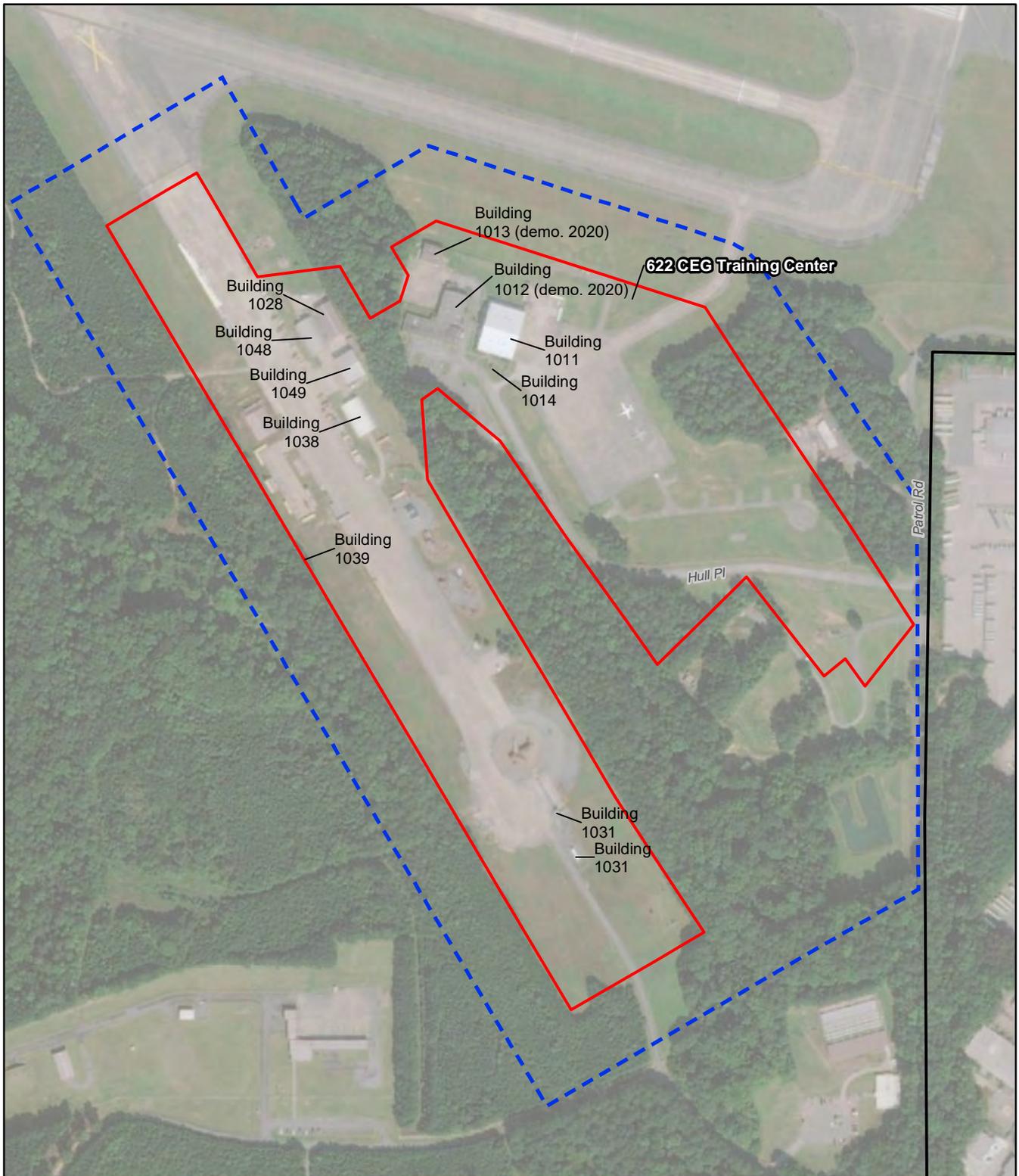
-  Dobbins Air Reserve Base
-  Direct Area of Potential Effects
-  Indirect Area of Potential Effects
-  Proposed Approximate Building Location



**Figure 2-1**  
**Proposed Project Area**  
**622 CEG Headquarters Building**  
 Dobbins Air Reserve Base, Georgia

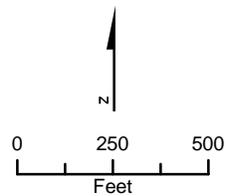
Basemap Source: Esri World Imagery, Maxar, 10/4/2020

\\gait\proj\USAF\3434300\MapFiles\Dobbins\Cultural\Figure\_2-1\_210707.mxd

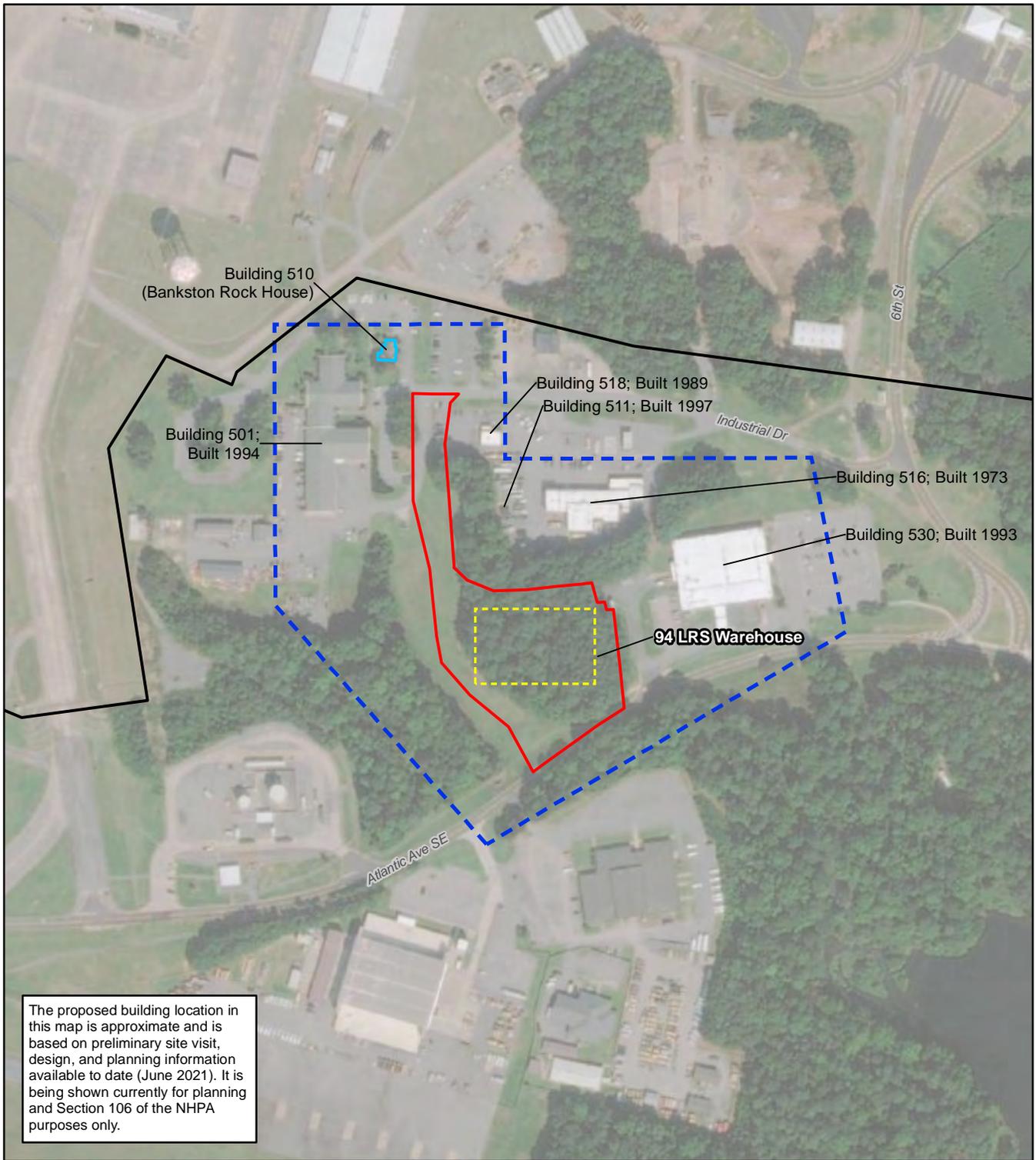


**Legend**

- Dobbins Air Reserve Base
- Direct Area of Potential Effects
- Indirect Area of Potential Effects



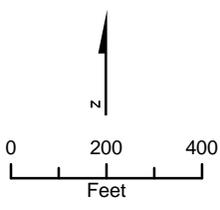
**Figure 2-2**  
**Proposed Project Area**  
**622 CEG Training Center**  
 Dobbins Air Reserve Base, Georgia



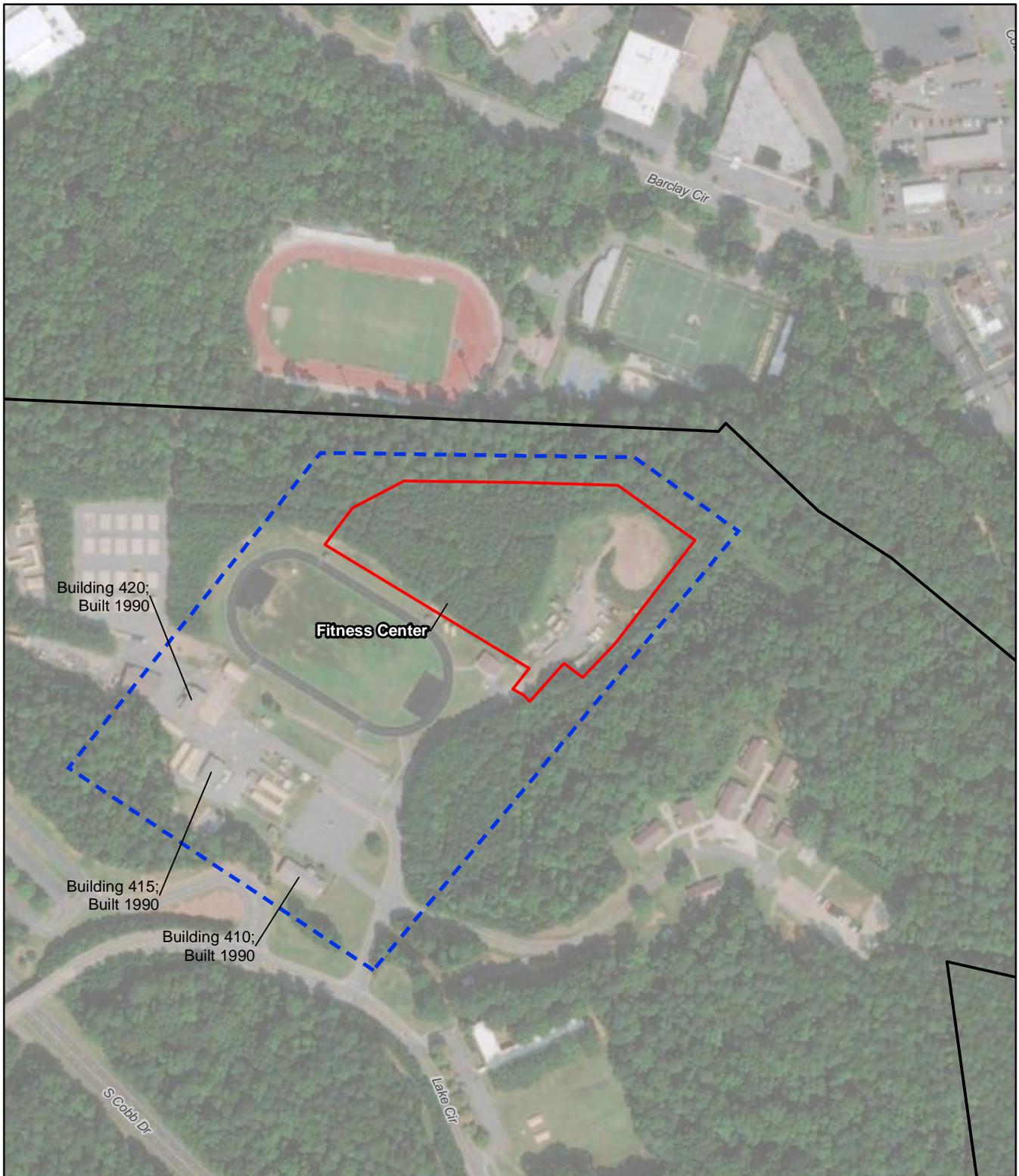
The proposed building location in this map is approximate and is based on preliminary site visit, design, and planning information available to date (June 2021). It is being shown currently for planning and Section 106 of the NHPA purposes only.

**Legend**

-  Dobbins Air Reserve Base
-  Direct Area of Potential Effects
-  Indirect Area of Potential Effects
-  Building 510 (Bankston Rock House, NRHP-listed)
-  Proposed Approximate Building Location

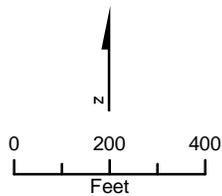


**Figure 2-3**  
**Proposed Project Area**  
**94 LRS Warehouse**  
 Dobbins Air Reserve Base, Georgia



**Legend**

-  Dobbins Air Reserve Base
-  Direct Area of Potential Effects
-  Indirect Area of Potential Effects



**Figure 2-4**  
**Proposed Project Area**  
**Fitness Center**  
 Dobbins Air Reserve Base, Georgia

**Attachment 3**  
**Photographs**



Photograph Key for 622 Civil Engineering Group (CEG) Headquarters (Photographs 1 through 4)



Photograph 1. View of the indirect APE for the proposed 622 CEG Headquarters Building, looking northeast along Ridenour Drive toward the proposed project area (at left).



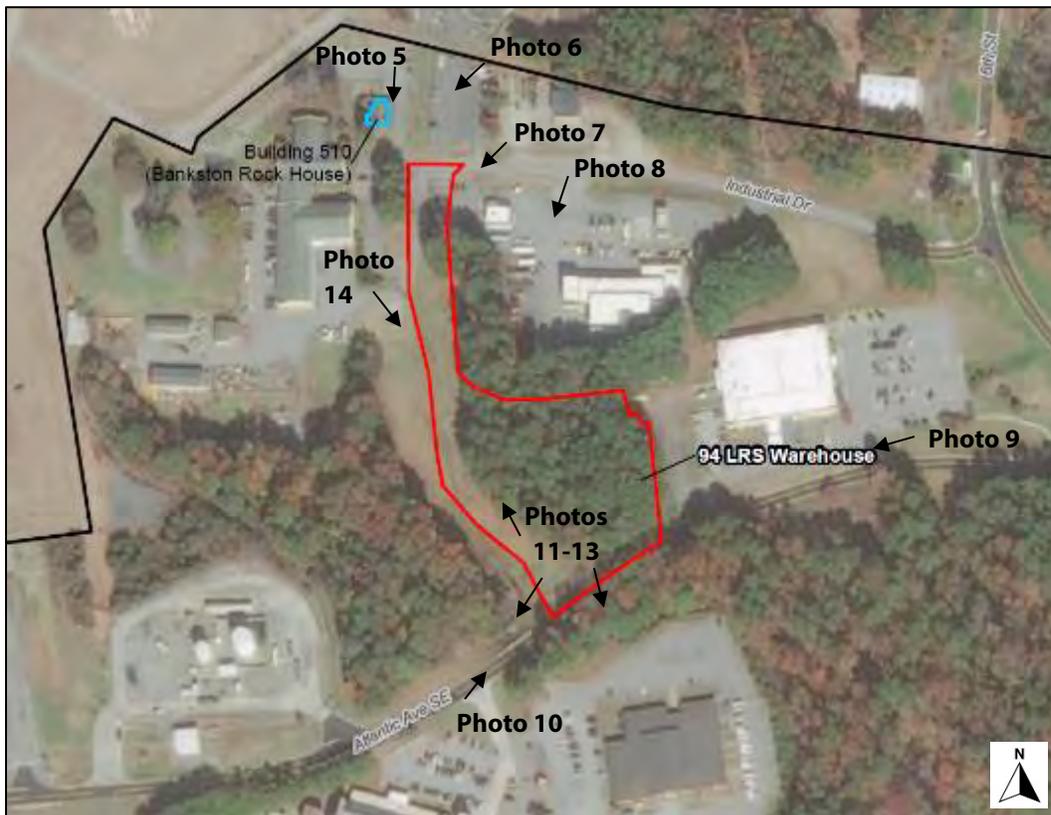
Photograph 2. View of the indirect APE from the proposed 622 CEG Headquarters Building location, looking south across Ridenour Drive.



Photograph 3. View of the indirect APE showing Building 469 (built 2017) adjacent to proposed 622 CEG Headquarters Building, looking southwest.



Photograph 4. View of the indirect APE for the proposed 622 CEG Headquarters Building location (at center-left) showing existing classroom buildings (built 2016–2017), looking northwest.



Photograph Key for 94 Logistics Readiness Squadron (LRS) Warehouse (Photographs 5 through 14)



Photograph 5. View from within the indirect APE for the LRS Warehouse location (in distance at left) showing Building 510 (Bankston Rock House, National Register of Historic Places (NRHP)-listed) with Building 501 (built 1994) at right, looking south.



Photograph 6. View from within the indirect APE for the LRS Warehouse location showing Building 510 (Bankston Rock House, NRHP-listed) at right with Building 501 (built 1994) at left, looking southwest.



Photograph 7. View of the indirect APE for the LRS Warehouse location (behind foliage at left) showing Building 518 (built 1989), looking southwest.



Photograph 8. View of the indirect APE for the LRS Warehouse location (behind foliage) showing Building 516 (built 1973), looking south.



Photograph 9. View of the indirect APE for the proposed 94 LRS Warehouse location (at center) and Building 530 (built 1993) along Atlantic Avenue SE, looking west.



Photograph 10. View of the proposed 94 LRS Warehouse location (at center) along Atlantic Avenue SE, looking northeast.



Photograph 11. View of the indirect APE from the proposed 94 LRS Warehouse location (at right), looking northwest.



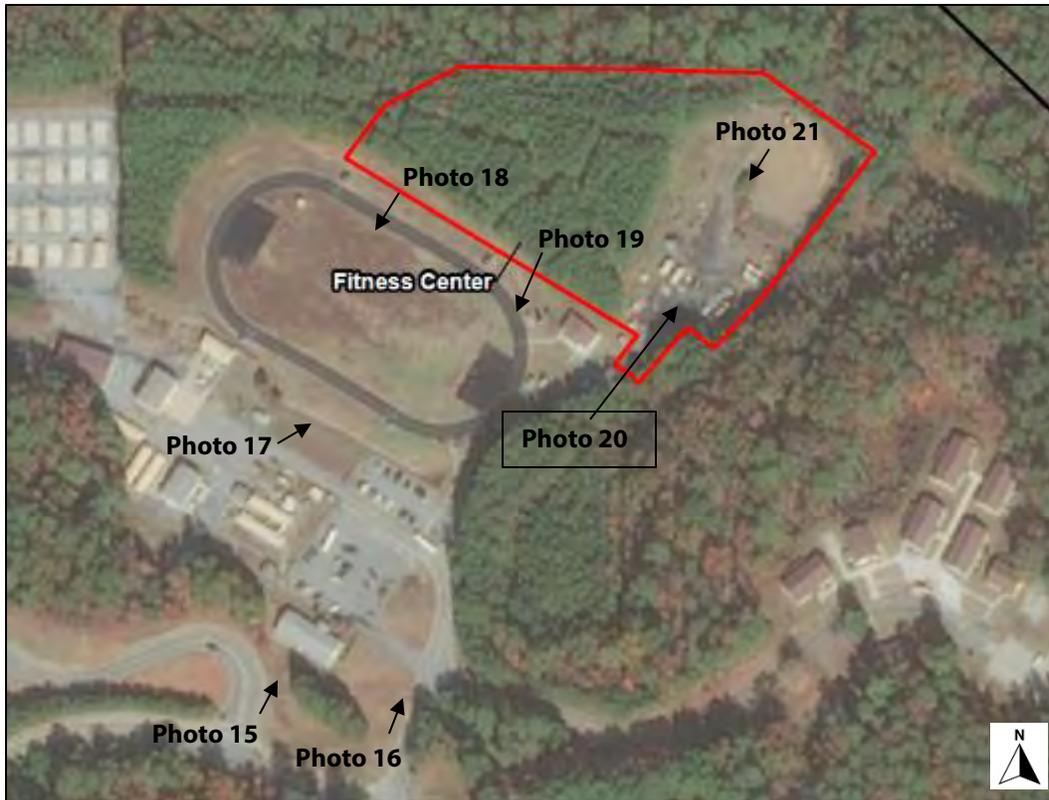
Photograph 12. View from the proposed 94 LRS Warehouse location, looking southwest along Atlantic Avenue SE.



Photograph 13. View of the indirect APE from the proposed 94 LRS Warehouse location, looking south across Atlantic Avenue SE.



Photograph 14. View of the direct APE from in front of Building 501, looking southeast.



Photograph Key for Fitness Center (Photographs 15 through 21)



Photograph 15. View of the indirect APE for the proposed Fitness Center location, looking northeast from Lake Circle toward Building 410 (built 1990).



Photograph 16. View of the indirect APE for the proposed Fitness Center location (in distance at center), looking north from Lake Circle.



Photograph 17. View from within the indirect APE for the proposed Fitness Center location (in distance at center), looking northeast across the existing track (ca. 2010).



Photograph 18. View from within the indirect APE for the proposed Fitness Center location (behind camera), looking southwest across the existing track toward Building 410 (at left, built 1990), Building 415 (at right, built 1990), and Building 420 (at far right, built 1990).



Photograph 19. View from within the indirect APE for the proposed Fitness Center location (behind camera), looking southwest across the existing track toward Building 410 (built 1990).



Photograph 20. View from within the direct APE for the proposed Fitness Center location (off-camera at left), looking northeast.



Photograph 21. View from within the direct APE for the proposed Fitness Center location (at right), looking southwest at Electrical Training area.

August 18, 2021

William C. Powell  
Chief, Environmental Flight  
94 MSG/CE  
901 Industrial Drive  
Dobbins Air Reserve Base, Georgia 30069  
**Attn: William Parker Johnson**

**RE: Dobbins Air Reserve Base: Construct Four (4) Facilities, Marietta  
Cobb County, Georgia  
HP-210629-007**

Dear Mr. Powell:

The Historic Preservation Division (HPD) has received the additional information submitted concerning the above referenced project. Our comments are offered to assist the U.S. Department of the Air Force and Dobbins Air Reserve Base (ARB) in complying with provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA).

The subject project consists of the construction of four (4) facilities for the 622nd Civil Engineering Group within Dobbins ARB, including a headquarters building, training center, warehouse, and fitness center. Previously, HPD requested additional information regarding the scope of work, area of potential effect, resources identified, and photographs. Based on the additional information submitted, HPD concurs that the National Register of Historic Places (NRHP)-listed Bankston Rock House is within the proposed project's area of potential effect (APE). Additionally, HPD finds that the eligibility of Building 401, also within the proposed project's APE, is unknown for listing in the NRHP, due to a lack of information. However, HPD concurs that no historic properties that are listed, eligible for, or unknown for listing in the NRHP will be affected by this undertaking, as defined in 36 CFR Part 800.4(d)(1), due to existing intrusions and intervening mature vegetation. In addition to the proposed actions for unanticipated discoveries, if human remains are located, HPD recommends following the Advisory Council on Historic Preservation's *Policy Statement Regarding Treatment of Burial Sites, Human Remains, and Funerary Objects*.

This letter evidences consultation with our office for compliance with Section 106 of the NHPA. It is important to remember that any changes to this project as it is currently proposed will require additional consultation. HPD encourages federal agencies to discuss such changes with our office to ensure that potential effects to historic properties are adequately considered in project planning.

Please refer to project number **HP-210329-007** in any future correspondence regarding this project. If we may be of further assistance, please contact me at [jennifer.dixon@dca.ga.gov](mailto:jennifer.dixon@dca.ga.gov) or (404) 486-6376.

Sincerely,



Jennifer Dixon, MHP, LEED Green Associate  
Program Manager  
Environmental Review & Preservation Planning



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Office of the Chief

**Chuck Hoskin Jr.**  
*Principal Chief*

**Bryan Warner**  
*Deputy Principal Chief*

June 23, 2021

Parker Johnson  
United States Air Force  
901 Industrial Drive, Building 510  
Dobbins Air Reserve Base, GA 30069

Re: Environmental Assessment for Construction Projects at Dobbins Air Reserve Base

Mr. Parker Johnson:

The Cherokee Nation (Nation) is in receipt of your correspondence about the proposed **Environmental Assessment for Construction Projects at Dobbins Air Reserve Base**, and appreciates the opportunity to provide comment upon this project.

The Nation maintains databases and records of cultural, historic, and pre-historic resources in this area. Our Historic Preservation Office reviewed this project, cross referenced the project's legal description against our information, and found no instances where this project intersects or adjoins such resources. Thus, the Nation does not foresee this project imparting impacts to Cherokee cultural resources at this time.

However, the Nation requests that the United States Air Force (USAF) halt all project activities immediately and re-contact our Offices for further consultation if items of cultural significance are discovered during the course of this project.

Additionally, the Nation requests that USAF conduct appropriate inquiries with other pertinent Tribal and Historic Preservation Offices regarding historic and prehistoric resources not included in the Nation's databases or records.

If you require additional information or have any questions, please contact me at your convenience. Thank you for your time and attention to this matter.

Wado,

Elizabeth Toombs, Tribal Historic Preservation Officer  
Cherokee Nation Tribal Historic Preservation Office  
elizabeth-toombs@cherokee.org  
918.453.5389

**From:** [GAES Assistance, FW4](#)  
**To:** [Jackson, Sara/ORL](#)  
**Subject:** Re: [EXTERNAL] Section 7 Consultation - Dobbins Air Reserve Base  
**Date:** Wednesday, May 26, 2021 12:38:16 PM

---

Hi Sara,

Apologies for the lack of response. It looks like this memo/letter was sent to the regional office but we (Georgia Ecological Services Field Office in Athens) would be the ones to handle all consultations of this nature. I'm sure it just got lost at the RO somewhere, so apologies again.

Thank you for the opportunity to review and provide comments on this project. However, the Service is not authorized to concur with "no effect" determinations and our office typically does not make comments related to no effect determinations unless we would like more information or a reconsideration of those determinations. The Service has no comment on these determinations at this time.

Obligations of section 7(a)(2) of the Act have been satisfied, and formal consultation is not required. However, obligations under the Act must be reconsidered if: (1) the project is modified in a manner not considered by this assessment; (2) a new species is listed or critical habitat is determined that may be affected by the project; or (3) new information indicates that the project may affect listed species or critical habitat in a manner not previously considered.

-Eric

Eric F. Bauer, PhD  
Fish and Wildlife Biologist

Georgia Ecological Services | U.S. Fish and Wildlife Service

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North Georgia Field Office  
355 East Hancock Avenue, Room 320, Box 7, Athens, GA 30601  
(706) 613-9493

Coastal Georgia Field Office  
4980 Wildlife Drive, Townsend, Georgia 31331  
(912) 832-8739

West Georgia Field Office  
P.O. Box 52560, Ft. Benning, Georgia 31995-2560  
(706) 544-6030

[www.fws.gov/athens/](http://www.fws.gov/athens/)

NOTE: This email correspondence and any attachments to and from this sender is subject to the Freedom of Information Act (FOIA) and may be disclosed to third parties.

---

**From:** Jackson, Sara/ORL <Sara.Jackson1@jacobs.com>  
**Sent:** Wednesday, May 26, 2021 11:58 AM  
**To:** GAES Assistance, FW4 <gaes\_assistance@fws.gov>  
**Subject:** [EXTERNAL] Section 7 Consultation - Dobbins Air Reserve Base

**This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.**

Good morning,  
Jacobs Engineering is working with Dobbins Air Reserve Base to prepare an Environmental Assessment for proposed construction of new facilities and training areas on the installation. We pulled the IPaC species list and compared against the installation's Integrated Natural Resources Management Plan and current conditions on the base, and determined there to be no effect to the two plant species that were identified in the species list. Dobbins Air Reserve Base sent a letter requesting USFWS' concurrence with the determination in March 2021. They have not received a response and were wondering if your office intends to provide one. If no official response is expected, we will document that in our files.

A copy of the letter is attached for your reference. Please note that the original letter was sent to Region 4 in Atlanta; would the following address have been more appropriate?

U.S. Fish and Wildlife Service - Georgia Ecological Services  
North Georgia  
355 East Hancock Ave. Room 320  
Box 7  
Athens, GA 30601

Thank you,  
Sara Jackson

**Sara Jackson, PMP, REM, REPA, CEA** | [Jacobs](#) | Sr. Environmental Scientist  
M: 321.890.3648 | [sara.jackson1@jacobs.com](mailto:sara.jackson1@jacobs.com)  
200 S. Orange Avenue Suite 900 | Orlando, FL 32801 | USA

PTO: 10-14 June 2021

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**From:** [JOHNSON, WILLIAM P GS-12 USAF AFRC 94 CE/CEV](#)  
**To:** [Jackson, Sara/ORL](#)  
**Cc:** [Naccarato, Andrea/ATL](#)  
**Subject:** [EXTERNAL] FW: Dobbins EA Scoping EPA Comments  
**Date:** Thursday, May 27, 2021 9:18:41 AM  
**Attachments:** [Dobbins EA NOI Scoping.pdf](#)  
[Dobbins EA Comment Letter EPA.docx](#)

---

Here is the response from EPA.

Parker Johnson  
Environmental Engineer  
94 MSG/CEV  
901 Industrial Drive, Bldg. 510  
Dobbins ARB, GA 30069  
[william.johnson.200@us.af.mil](mailto:william.johnson.200@us.af.mil)  
Office: 678-655-3549 DSN: 625-3549

---

**From:** White, Douglas <[White.Douglas@epa.gov](mailto:White.Douglas@epa.gov)>  
**Sent:** Thursday, May 27, 2021 8:31 AM  
**To:** JOHNSON, WILLIAM P GS-12 USAF AFRC 94 CE/CEV <[william.johnson.200@us.af.mil](mailto:william.johnson.200@us.af.mil)>  
**Cc:** Kajumba, Ntale <[Kajumba.Ntale@epa.gov](mailto:Kajumba.Ntale@epa.gov)>; POWELL, WILLIAM C CIV USAF AFRC 94 CE/CEV <[william.powell.28@us.af.mil](mailto:william.powell.28@us.af.mil)>; HEFTY, BRENT S GS-12 USAF AFRC HQ AFRC/A4CA <[brent.hefty@us.af.mil](mailto:brent.hefty@us.af.mil)>  
**Subject:** [Non-DoD Source] Dobbins EA Scoping EPA Comments

Good morning Parker,

Please see attached EPA's comments on Dobbins ARB's EA scoping for new facilities.

V/R Doug  
Douglas White  
U.S. Environmental Protection Agency / Region 4  
Strategic Programs Office, NEPA Section  
61 Forsyth Street, SW  
Atlanta, GA 30303-8960  
Office: 404-562-8586  
[white.douglas@epa.gov](mailto:white.douglas@epa.gov)

Dobbins Air Reserve Base  
901 Industrial Drive  
Dobbins ARB, GA 30069

Re: EPA Comments on the Notice of Intent to Prepare an Environmental Assessment for the Construction of New Facilities at Dobbins Air Reserve Base, Cobb County, Georgia

Dear Mr. Johnson:

The U. S. Environmental Protection Agency (EPA) is in receipt of the referenced document and has reviewed the subject proposal in accordance with Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act (NEPA). The EPA understands that Dobbins Air Reserve Base (Dobbins ARB) is conducting an Environmental Assessment (EA) for the proposed construction and operation of facilities in support of the 622<sup>nd</sup> Civil Engineering Group, the 94<sup>th</sup> Logistics Readiness Squadron, and base wide physical fitness.

Under the Proposed Action Alternative, Dobbins ARB would construct a warehouse (56,000 SF), a fitness facility (36,000 SF), a headquarters building (12,500 SF), a storage building (20,000 SF), two concrete pads (200,000 SF), an earth moving equipment training site, a support road, and stormwater control structures. The proposed action does not increase permanent personnel but does support concurrent training of 2,000 Reservists where existing facilities support 1,000 Reservists. The purpose of this EA is for Dobbins ARB to evaluate the impacts of this proposed action.

Upon review of the scoping documents, the EPA notes that the improvements considered are reasonably consistent with the current land use of this facility. It also appears that this project will not have a significant impact on human health and the environment. The EPA has the following comments:

**Air Quality:** The proposed action is located in Cobb County, Georgia which is currently in nonattainment with the National Ambient Air Quality Standards for 8-Hour Ozone. The EPA recommends analyzing the proposed action using tools such as the Air Conformity Applicability Model to verify that the proposed action will not produce emissions above de minimis levels or contribute toward exceeding Dobbins ARB's air emissions permit. The EPA understands that earth moving equipment training currently takes place at Dobbins ARB and the frequency of that training may increase with the completion of new facilities. The EPA recommends controlling fugitive dust emissions and implementing measures to reduce diesel emissions, such as switching to cleaner fuels, retrofitting current equipment with emission reduction technologies, repowering older engines with newer cleaner engines, replacing older vehicles, and reducing idling through operator training and/or contracting policies.

Water Quality: This proposed action would disturb a considerable amount of soil. A county construction stormwater permit will be required before construction can begin. Construction may impact surface water bodies and best management practices (BMPs) should be applied to protect these water bodies before and after construction. Ongoing land disturbance at the Dead Runway training site may require regular maintenance of BMPs. Outfall monitoring and sampling should be analyzed with consideration of the impairment status of Dobbins ARB's downstream surface waters. Construction and post construction activities should not affect Dobbins ARB's compliance with industrial stormwater permit GAR050000. The EPA recommends that Waters of the United States (WOTUS) delineations and flood water maps inform project development, and coordination with the US Army Corps of Engineers be made where proposed activities might enter or affect WOTUS. Land development and construction of impervious surfaces should take place alongside the construction of rainwater runoff control structures that are designed to leave existing stormwater runoff profiles for Dobbins ARB unchanged, in accordance with Section 438 of the Energy Independence and Security Act of 2007, and within the flow capacity of existing spill ponds.

Geological Resources, IRP Sites, and Hazardous Waste Disposal: Resource Conservation and Recovery Act solid wastes should be disposed of in accordance with federal regulations. Department of Defense Installation Restoration Program (IRP) management and state IRP databases should be consulted prior to construction. The EPA understands that the proposed action locations are near IRP sites and recommends including details and locations of these sites within the draft and final NEPA documents.

Alternatives Considered: The EPA appreciates the development and analysis of several alternative project proposals. The EPA recommends including details of considered alternatives within draft and final NEPA documents. Please consider using the NEPAassist tool (<https://www.epa.gov/nepa/nepassist>), as part of the NEPA analysis process. NEPAassist combines multiple Geographic Information System (GIS) and internet databases to help screen for environmental concerns.

Energy and Recycling: Efforts should be made to divert any recyclable materials such as concrete, steel and asphalt away from landfills and repurpose the material instead. The appropriate NEPA document should also address potential environmental impacts to construction workers. Project management should consider sustainable building practices that utilize variable forms of proven renewable energy for the proposed project, for example, solar power for supplemental electricity and lighting for the taxiway, parking lots, or special buildings that may be proposed in the various projects. Please see the following link for additional information: [http://www.wbdg.org/references/federal\\_mandates.php](http://www.wbdg.org/references/federal_mandates.php).

Environmental Justice: Consistent with Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (<https://www.epa.gov/laws-regulations/summary-executive-order-12898-federal-actions-address-environmental-justice>), please ensure protected populations are not disproportionately or adversely impacted by the project. We also promote compliance with Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, if applicable. Please use the EJSCREEN tool (<https://www.epa.gov/ejscreen>) as part of the NEPA analysis process.

EJSCREEN combines environmental and demographic data to help determine environmental justice concerns that are integral to the NEPA process.

Thank you for the opportunity to provide comments on Dobbins ARB's proposed facilities project. For effective coordination, please provide this office with an electronic version of the draft EA for further review and remember to keep the local community informed and involved throughout the project process. If you have any questions, feel free to contact me at the information provided in my email.

Appendix B  
Notice of Availability

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**PROOF OF PUBLICATION**  
**STATE OF GEORGIA**

**PUBLIC NOTICE**

Before the undersigned authority personally appeared , who on oath says that he/she is a Legal Advertising Representative of the Atlanta Journal-Constitution, a Daily newspaper published in said City and State that is a newspaper of general circulation in Barrow, Bartow, Carroll, Chattooga, Cherokee, Clarke, Clayton, Cobb, Coweta, DeKalb, Douglas, Fayette, Floyd, Forsyth, Fulton, Gwinnett, Hall, Heard, Henry, Jackson, Jasper, Meriweather, Morgan, Newton, Paulding, Polk, Rockdale, Walton, White, Banks, Butts, Dawson, Franklin, Gilmer, Gordon, Habersham, Haralson, Lamar, Lumpkin, Madison, Monroe, Murray, Oconee, Pickens, Pike, Spalding, and Whitfield Counties, and State of Georgia, and that the attached copy of Legal Advertising was published 2 time(s) in said newspaper on 03/26/2021 and last date of Publication 03/27/2021.

JACOBS  
200 S. ORANGE AVENUE SUITE 900  
ORLANDO, FL 32801

Signed

\_\_\_\_\_  
(Legal Advertising Agent)

Sworn or affirmed to, and subscribed before me, this 30th day of March, 2021 in Testimony whereof, I have hereunto set my hand and affixed my official seal, the day and year aforesaid.

Signed

\_\_\_\_\_  
(Notary)

Please see Ad on following page(s).

**SARAH PEREZ**  
Notary Public - State of New York  
No.01PE6397402  
Qualified in Erie County  
My Commission Expires 09/03/2023

## Notice for Early Public Review of a Proposed Activity Near Wetlands

To: All Interested Agencies, Groups, and Individuals

The U.S. Air Force (USAF) proposes to construct new facilities at Dobbins Air Reserve Base (ARB) in Cobb County, Georgia. The Proposed Action would include construction near wetlands. Construction would not impact the 100-year floodplain and will avoid or minimize impacts to wetlands. This notice is required by Section 2(b) of Executive Order (EO) 11990, "Protection of Wetlands," and by Section 2(a)(4) of EO 11988, "Floodplain Management," and has been prepared and made available to the public by the USAF in accordance with *Code of Federal Regulations* Title 32, Part 989.24(c), and Air Force Instruction 32-7064, *Integrated Natural Resources Management*, for actions proposed in wetlands and floodplains.

The new facilities would include a warehouse, a headquarters building, a fitness center, and training facilities for runway repair activities. The purpose of the Proposed Action is to provide new, permanent facilities needed to accommodate current and future mission requirements. The Proposed Action would provide modern facilities and training areas that are properly sized and designed for the intended use, collocate similar staff functions, and ensure land use is consistent with installation planning guidelines. The USAF is preparing an environmental assessment (EA) in accordance with the National Environmental Policy Act to analyze the potential environmental impacts of the Proposed Action.

The USAF is seeking advance public comment on the proposed project to determine if there are any public concerns regarding the project's potential impacts and is soliciting public input and comments on potential project alternatives. The full EA will be available for public review in the summer of 2021.

Please provide written comments to: 94th Airlift Wing Public Affairs, Attention: Public Affairs, 1430 First St. Bldg. 838, Dobbins ARB, GA 30069; or provide comments by email at: [94aw.pa@us.af.mil](mailto:94aw.pa@us.af.mil). Comments will be accepted for 30 days from the publication of this notice.

# MARIETTA DAILY JOURNAL

47 Waddell St Marietta, Georgia 30060

## PUBLISHER'S AFFIDAVIT

STATE OF GEORGIA - County of Cobb

Before me, the undersigned; a Notary Public, this day personally came Otis Brumby III, who, being duly sworn, according to law, says that he is the Publisher of Times Journal, Inc., publisher of the MARIETTA DAILY JOURNAL, official newspaper published in said county and State, and that the publication, of which the annexed is a true copy, was published in said paper, as provided by law, on the following dates:

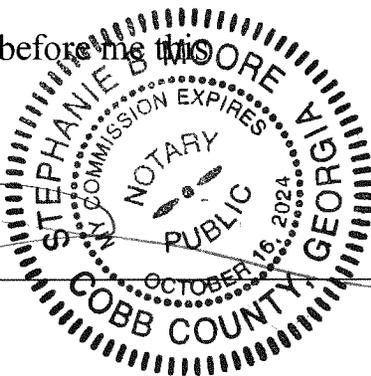
3/26/2021 3/27/2021

*Otis A. Brumby III*

Subscribed and sworn to before me this

27th day of March, 2021

Notary Public



My commission expires:

*October 16, 2024*

### **Notice for Early Public Review of a Proposed Activity Near Wetlands**

To: All Interested Agencies, Groups, and Individuals

The U.S. Air Force (USAF) proposes to construct new facilities at Dobbins Air Reserve Base (ARB) in Cobb County, Georgia. The Proposed Action would include construction near wetlands. Construction would not impact the 100-year floodplain and will avoid or minimize impacts to wetlands. This notice is required by Section 2(b) of Executive Order (EO) 11990, "Protection of Wetlands," and by Section 2(a)(4) of EO 11988, "Floodplain Management," and has been prepared and made available to the public by the USAF in accordance with Code of Federal Regulations Title 32, Part 989.24(c), and Air Force Instruction 32-7064, Integrated Natural Resources Management, for actions proposed in wetlands and floodplains.

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# The Atlanta Journal-Constitution

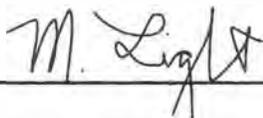
## PROOF OF PUBLICATION STATE OF GEORGIA

### PUBLIC NOTICE

Before the undersigned authority personally appeared , who on oath says that he/she is a Legal Advertising Representative of the Atlanta Journal-Constitution, a Daily newspaper published in said City and State that is a newspaper of general circulation in Barrow, Bartow, Carroll, Chattooga, Cherokee, Clarke, Clayton, Cobb, Coweta, DeKalb, Douglas, Fayette, Floyd, Forsyth, Fulton, Gwinnett, Hall, Heard, Henry, Jackson, Jasper, Meriweather, Morgan, Newton, Paulding, Polk, Rockdale, Walton, White, Banks, Butts, Dawson, Franklin, Gilmer, Gordon, Habersham, Haralson, Lamar, Lumpkin, Madison, Monroe, Murray, Oconee, Pickens, Pike, Spalding, and Whitfield Counties, and State of Georgia, and that the attached copy of Legal Advertising was published 2 time(s) in said newspaper on 07/09/2021 and last date of Publication 07/10/2021.

JACOBS  
200 S. ORANGE AVENUE SUITE 900  
ORLANDO, FL 32801

Signed



(Legal Advertising Agent)

Sworn or affirmed to, and subscribed before me, this 21st day of July, 2021 in Testimony whereof, I have hereunto set my hand and affixed my official seal, the day and year aforesaid.

Signed



(Notary)

Please see Ad on following page(s).

Sarah Perez  
Notary Public - State of New York  
No. 01PE639740Z  
Qualified in Erie County  
Commission Expires 09/03/2023

## **NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT**

The U.S. Air Force (USAF) has prepared an environmental assessment (EA) to analyze impacts that could result from construction of new facilities at Dobbins Air Reserve Base (ARB) in Cobb County, Georgia.

The new facilities would include a warehouse, a headquarters building, a fitness center, and training facilities for runway repair activities.

The EA and draft Finding of No Significant Impact are available for 30 days of public review and comment at the Smyrna Public Library, 100 Village Green Circle, Smyrna, GA 30080 and online at <https://www.dobbins.afrc.af.mil/About-Us/Environmental-Impact/>.

The USAF is aware of the impacts of the ongoing coronavirus pandemic on the usual methods of accessing information and communicating, such as the closure of local public libraries and the increased consumer demand on mobile and broadband Internet networks. The USAF seeks to implement appropriate measures to ensure that the public and all interested stakeholders have the opportunity to participate fully in this EA process. Accordingly, please contact us directly at the email address below if you need help resolving issues involving access to the documents or the ability to comment.

Written comments will be considered for 30 days after the publication of this notice. Comments should be sent by mail to: 94th Airlift Wing Public Affairs, Attention: Public Affairs, 1430 First St. Bldg. 838, Dobbins ARB, GA 30069, or by email to [94aw.pa@us.af.mil](mailto:94aw.pa@us.af.mil).

# MARIETTA DAILY JOURNAL

47 Waddell Street, Marietta, GA 30060

## PUBLISHER'S AFFIDAVIT

STATE OF GEORGIA - County of Cobb

Before me, the undersigned; a Notary Public,  
this day personally came Otis A. Brumby III,  
who, being duly sworn, according to law, says  
that he is the Publisher of Times Journal, Inc.,  
publishers of the MARIETTA DAILY JOURNAL,  
official newspaper published in said county  
and State, and that the publication, of  
which the annexed is a true copy, was  
published in said paper, as provided by law,  
on the following dates:

07/09/2021 07/10/2021

*Otis A. Brumby III*

Subscribed and sworn to before me this

10th day of July, 2021



Notary Public

My commission expires \_\_\_\_\_



### **NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT**

The U.S. Air Force (USAF) has prepared an environmental assessment (EA) to analyze impacts that could result from construction of new facilities at Dobbins Air Reserve Base (ARB) in Cobb County, Georgia. The new facilities would include a warehouse, a headquarters building, a fitness center, and training facilities for runway repair activities.

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Appendix C  
Air Quality Emissions Calculations and  
Record of Conformity Analysis

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# AIR CONFORMITY APPLICABILITY MODEL REPORT RECORD OF CONFORMITY ANALYSIS (ROCA)

**1. General Information:** The Air Force’s Air Conformity Applicability Model (ACAM) was used to perform an analysis to assess the potential air quality impact/s associated with the action in accordance with the Air Force Manual 32-7002, Environmental Compliance and Pollution Prevention; the Environmental Impact Analysis Process (EIAP, 32 CFR 989); and the General Conformity Rule (GCR, 40 CFR 93 Subpart B). This report provides a summary of the ACAM analysis.

**a. Action Location:**

**Base:** DOBBINS JARB  
**State:** Georgia  
**County(s):** Cobb  
**Regulatory Area(s):** Atlanta, GA

**b. Action Title:** Construction Projects at Dobbins ARB

**c. Project Number/s (if applicable):**

**d. Projected Action Start Date:** 10 / 2021

**e. Action Description:**

Proposed Action includes construction of: 622 CEG Headquarters Building and Training Center; 94 LRS Warehouse; and Fitness Center.

**f. Point of Contact:**

**Name:** Caitlin Santinelli  
**Title:** Scientist  
**Organization:** Jacobs  
**Email:** caitlin.santinelli@jacobs.com  
**Phone Number:** 314.974.6958

**2. Analysis:** Total combined direct and indirect emissions associated with the action were estimated through ACAM on a calendar-year basis for the “worst-case” and “steady state” (net gain/loss upon action fully implemented) emissions. General Conformity under the Clean Air Act, Section 1.76 has been evaluated for the action described above according to the requirements of 40 CFR 93, Subpart B.

Based on the analysis, the requirements of this rule are:          applicable  
  X   not applicable

**Conformity Analysis Summary:**

**2021**

Pollutant	Action Emissions (ton/yr)	GENERAL CONFORMITY	
		Threshold (ton/yr)	Exceedance (Yes or No)
Atlanta, GA			
VOC	0.080	100	No
NOx	0.515	100	No
CO	0.485		
SOx	0.001		
PM 10	1.755		
PM 2.5	0.022		
Pb	0.000		
NH3	0.000		
CO2e	120.9		

# AIR CONFORMITY APPLICABILITY MODEL REPORT RECORD OF CONFORMITY ANALYSIS (ROCA)

## 2022

Pollutant	Action Emissions (ton/yr)	GENERAL CONFORMITY	
		Threshold (ton/yr)	Exceedance (Yes or No)
Atlanta, GA			
VOC	0.564	100	No
NOx	1.116	100	No
CO	1.244		
SOx	0.003		
PM 10	0.052		
PM 2.5	0.052		
Pb	0.000		
NH3	0.001		
CO2e	256.0		

## 2023

Pollutant	Action Emissions (ton/yr)	GENERAL CONFORMITY	
		Threshold (ton/yr)	Exceedance (Yes or No)
Atlanta, GA			
VOC	0.000	100	No
NOx	0.000	100	No
CO	0.000		
SOx	0.000		
PM 10	0.000		
PM 2.5	0.000		
Pb	0.000		
NH3	0.000		
CO2e	0.0		

## 2024

Pollutant	Action Emissions (ton/yr)	GENERAL CONFORMITY	
		Threshold (ton/yr)	Exceedance (Yes or No)
Atlanta, GA			
VOC	0.095	100	No
NOx	0.551	100	No
CO	0.614		
SOx	0.002		
PM 10	5.221		
PM 2.5	0.021		
Pb	0.000		
NH3	0.000		
CO2e	162.4		

## 2025

Pollutant	Action Emissions (ton/yr)	GENERAL CONFORMITY	
		Threshold (ton/yr)	Exceedance (Yes or No)
Atlanta, GA			
VOC	0.833	100	No
NOx	1.052	100	No
CO	1.414		
SOx	0.003		
PM 10	0.039		
PM 2.5	0.038		

## AIR CONFORMITY APPLICABILITY MODEL REPORT RECORD OF CONFORMITY ANALYSIS (ROCA)

<b>Pb</b>	0.000		
<b>NH3</b>	0.002		
<b>CO2e</b>	315.5		

### 2026

Pollutant	Action Emissions (ton/yr)	GENERAL CONFORMITY	
		Threshold (ton/yr)	Exceedance (Yes or No)
Atlanta, GA			
<b>VOC</b>	0.091	100	No
<b>NOx</b>	0.507	100	No
<b>CO</b>	0.608		
<b>SOx</b>	0.002		
<b>PM 10</b>	7.819		
<b>PM 2.5</b>	0.019		
<b>Pb</b>	0.000		
<b>NH3</b>	0.000		
<b>CO2e</b>	162.4		

### 2027

Pollutant	Action Emissions (ton/yr)	GENERAL CONFORMITY	
		Threshold (ton/yr)	Exceedance (Yes or No)
Atlanta, GA			
<b>VOC</b>	0.626	100	No
<b>NOx</b>	1.154	100	No
<b>CO</b>	1.552		
<b>SOx</b>	0.003		
<b>PM 10</b>	2.644		
<b>PM 2.5</b>	0.044		
<b>Pb</b>	0.000		
<b>NH3</b>	0.002		
<b>CO2e</b>	342.9		

### 2028 - (Steady State)

Pollutant	Action Emissions (ton/yr)	GENERAL CONFORMITY	
		Threshold (ton/yr)	Exceedance (Yes or No)
Atlanta, GA			
<b>VOC</b>	0.000	100	No
<b>NOx</b>	0.000	100	No
<b>CO</b>	0.000		
<b>SOx</b>	0.000		
<b>PM 10</b>	0.000		
<b>PM 2.5</b>	0.000		
<b>Pb</b>	0.000		
<b>NH3</b>	0.000		
<b>CO2e</b>	0.0		

None of estimated emissions associated with this action are above the conformity threshold values established at 40 CFR 93.153 (b); Therefore, the requirements of the General Conformity Rule are not applicable.

**AIR CONFORMITY APPLICABILITY MODEL REPORT  
RECORD OF CONFORMITY ANALYSIS (ROCA)**



---

Caitlin Santinelli, Scientist

4/13/21  
DATE

# AIR CONFORMITY APPLICABILITY MODEL REPORT RECORD OF CONFORMITY ANALYSIS (ROCA)

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**a. Action Location:**

**Base:** DOBBINS JARB  
**State:** Georgia  
**County(s):** Cobb  
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**c. Project Number/s (if applicable):**

**d. Projected Action Start Date:** 10 / 2022

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**Name:** Caitlin Santinelli  
**Title:** Scientist  
**Organization:** Jacobs  
**Email:** caitlin.santinelli@jacobs.com  
**Phone Number:** 314.974.6958

**2. Analysis:** Total combined direct and indirect emissions associated with the action were estimated through ACAM on a calendar-year basis for the “worst-case” and “steady state” (net gain/loss upon action fully implemented) emissions. General Conformity under the Clean Air Act, Section 1.76 has been evaluated for the action described above according to the requirements of 40 CFR 93, Subpart B.

Based on the analysis, the requirements of this rule are: \_\_\_\_\_ applicable  
 \_\_\_X\_\_\_ not applicable

**Conformity Analysis Summary:**

**2022**

Pollutant	Action Emissions (ton/yr)	GENERAL CONFORMITY	
		Threshold (ton/yr)	Exceedance (Yes or No)
Atlanta, GA			
VOC	0.050	100	No
NOx	0.043	100	No
CO	0.573		
SOx	0.000		
PM 10	0.001		
PM 2.5	0.001		
Pb	0.000		
NH3	0.003		
CO2e	52.6		

# AIR CONFORMITY APPLICABILITY MODEL REPORT RECORD OF CONFORMITY ANALYSIS (ROCA)

## 2023 - (Steady State)

Pollutant	Action Emissions (ton/yr)	GENERAL CONFORMITY	
		Threshold (ton/yr)	Exceedance (Yes or No)
Atlanta, GA			
VOC	0.200	100	No
NOx	0.174	100	No
CO	2.293		
SOx	0.001		
PM 10	0.005		
PM 2.5	0.004		
Pb	0.000		
NH3	0.013		
CO2e	210.5		

None of estimated emissions associated with this action are above the conformity threshold values established at 40 CFR 93.153 (b); Therefore, the requirements of the General Conformity Rule are not applicable.




---

Caitlin Santinelli, Scientist

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4/13/21  
DATE