

RECORD OF DECISION
ENVIRONMENTAL IMPACT STATEMENT (EIS)
T-7A RECAPITALIZATION AT LAUGHLIN AFB, TX

INTRODUCTION

The Department of the Air Force (DAF) will replace the existing T-38C aircraft with the beddown of the T-7A aircraft at Main Operating Base (MOB) 3, Laughlin Air Force Base (AFB), Texas. DAF considered the information, analyses, and public comments on and contained in the *Final Environmental Impact Statement (FEIS) for T-7A Recapitalization at Laughlin Air Force Base, Texas*, along with other matters, to make its decision.

This Record of Decision (ROD) is issued per the Council on Environmental Quality regulations implementing the National Environmental Policy Act at Title 40 Code of Federal Regulations (C.F.R.), §1505.2, “*Record of Decision in cases requiring Environmental Impact Statements*,” and the DAF Environmental Impact Analysis Process at Title 32 C.F.R., §989.21 “*Record of Decision*.”

This ROD documents:

- DAF’s decision;
- Alternatives considered;
- Environmentally preferable alternative;
- Factors considered in the decision;
- Whether DAF adopted all practicable means to avoid or minimize environmental harm from the selected alternative, and if not, why not;
- Mitigations.

DECISION SYNOPSIS

Air Education and Training Command (AETC) operates the T-38C from five pilot training installations: Joint Base San Antonio (JBSA)-Randolph in Texas, Columbus AFB in Mississippi, Laughlin AFB in Texas, Vance AFB in Oklahoma, and Sheppard AFB in Texas. DAF expects to procure approximately 350 T-7A aircraft from Boeing and deliver these aircraft to the five T-38C pilot training installations.

The recapitalization of Laughlin AFB third, would result in the least impact on the continuation of pilot training during the transition between airframes, provide the most cost-efficient student production and management plan, and align with AETC’s student pipeline flow for the Undergraduate Pilot Training, Introduction to Fighter Fundamentals, and the still to be developed Fighter/Bomber Fundamentals curricula.

AETC will recapitalize Laughlin AFB’s aging T-38C aircraft through implementation of Alternative 3 by replacing all T-38C aircraft at Laughlin AFB with up to 79 T-7A aircraft, limiting initial delivery to 51, per the Secretary of the Air Force Strategic Basing Decision approving Laughlin AFB as the third T-7A MOB.

Recapitalization will take place over an approximate 2-year period that entails transition of aircraft operations and associated special use airspace (SUA) from the T-38C to the T-7A, change in the number of personnel and dependents, and construction of and upgrades to operations, support, and maintenance facilities.

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ALTERNATIVES CONSIDERED

The EIS considered three action alternatives (i.e., Alternatives 1, 2, and 3) and the No Action Alternative. The three action alternatives considered different numbers of T-7A aircraft and associated numbers of T-7A operations at Laughlin AFB and associated SUA. These alternatives are described below.

Alternative 1. Under Alternative 1 (*FEIS, Pg. 2-2, § 2.2.2.1*) Laughlin AFB would receive up to 63 T-7A aircraft and perform sufficient operations for sustaining pilot training while simultaneously phasing out the T-38C aircraft. T-7A aircraft would be delivered to Laughlin AFB from the manufacturer beginning in 2030 and continuing through 2033. As T-7A aircraft are delivered and placed into service, T-38C aircraft would be withdrawn from service estimated between 2030 and 2031. The FEIS provides the annual number of T-38C and T-7A aircraft for Alternatives 1 and 2 (*FEIS, Pg. 2-2, Table 2-1*).

T-7A pilot training would use the same SUA used currently by the T-38C (*FEIS, Pg. 3-3, Table 3-1*). No changes to SUA configurations (i.e., size, shape, or location) are required for T-7A recapitalization. The T-7A are limited to sub-sonic speeds in all phases of pilot training. The FEIS provides the annual T-38C and T-7A aircraft operation numbers for Alternative 1 (*FEIS, Pg. 2-4, Table 2-2*).

Aircraft operations include evening and nighttime T-7A operations (*FEIS, Pg. 2-5, § 2.2.2.1.2*). Evening operations are those performed from dusk until 10 p.m., and nighttime operations occur between 10 p.m. and 7 a.m. as defined for aircraft noise modeling. T-38C currently operates during both periods at Laughlin AFB. Up to 493 annual nighttime T-7A operations would occur at Laughlin AFB for Alternative 1, which is approximately 0.5 percent of annual T-7A operations and a decrease of approximately 77 percent from baseline levels. Like the T-38C, nighttime T-7A operations would be conducted in the vicinity of the Laughlin AFB airfield and would not enter the SUA (i.e., Military Operations Areas [MOAs] and Military Training Routes [MTRs]).

An increase of approximately 190 personnel is projected at Laughlin AFB during the aircraft transition period when DAF would be training pilots with and maintaining two types of aircraft, resulting in a temporary increase in workforce requirements for operations, civilian simulator instructors, and maintenance. The initial increase in workforce would subside as T-38C aircraft are removed from service at Laughlin AFB. The steady state personnel requirement at Laughlin AFB is projected to be approximately 60 persons fewer than the current baseline staffing levels.

Associated with the workforce change is a corresponding change in the number of dependents (e.g., spouses, children, other family members). DAF estimates 361 dependents would accompany the 190 additional active-duty personnel during the aircraft transition period, for a total of 551 additional people in the Laughlin AFB vicinity during 2030 and 2031. After the aircraft transition period, there will be a loss of 60 personnel and their associated 114 dependents from the Laughlin AFB vicinity, as compared to current baseline staffing levels.

To provide modern facilities and infrastructure to support T-7A aircraft maintenance, training, and operational requirements, these projects are planned as follows (*FEIS, Pg. 2-2, Section 2.2.2.1*):

- Construct a ground-based training system facility.

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- Construct a unit maintenance training facility.
- Construct a new hush house.
- Construct up to 48 T-7A shelters.
- Construct an addition to the egress shop.
- Install jet blast deflectors.
- Modify Buildings 50 and 210 to meet Unified Facilities Criteria and facility safety requirements.
- Construct an antenna farm on top of the ground-based training system facility.
- Renovate the interior of the squadron operations buildings (Buildings 307, 320, and 328).
- Improve the airfield by remarking the T-38C ramp to the width of the T-7A. Install new moorings and anchor rods for T-7A aircraft. Replace aircraft arresting system. Remove above ground Centralized Aircraft Support System service modules.
- Rebuild the existing trim pad. Install proper concrete and a T-7A anchor block. Relocate the compass rose at the site to another magnetically quiet site.
- Construct a concrete pad and provide utilities for a storage container to store T-7A ejection system explosive components.
- Construct an addition onto Building 905. Add perimeter fences and gates and construct a 10-vehicle parking lot.

Alternative 2. Laughlin AFB would receive up to 63 T-7A aircraft but would perform T-7A operations at a level that is approximately 25 percent greater than Alternative 1. Alternative 2 is intended to cover a scenario in which, for either broad strategic or tactical operational reasons, DAF requires a surge or increase in pilot training operations above current plan. T-7A nighttime operations would occur with up to 614 annual nighttime operations at Laughlin AFB, which is a decrease of approximately 72 percent from baseline levels. All other aspects of Alternative 2, including the number of personnel and dependents and the supporting facilities projects, would be identical to those described for Alternative 1.

The FEIS provides the annual number of T-38C and T-7A aircraft operations for Alternatives 2 and 3 (*FEIS, Pg. 2-14, Table 2-5*).

Alternative 3. Laughlin AFB would receive up to 79 T-7A aircraft and maintain the same operations cadence/tempo as for Alternative 1, but due to the 25 percent increase in the number of aircraft over Alternatives 1 and 2, the total annual T-7A operations would occur at a level that is 25 percent greater than Alternative 1 and equal to the annual operations proposed for Alternative 2. Alternative 3 provides sufficient operational capacity for DAF to sustain pilot training and add a Fighter/Bomber Fundamentals curriculum to the installation. Alternative 3 also incorporates an expansion to install up to 60 shelters to accommodate the additional T-7A aircraft. All other aspects of Alternative 3 would be identical to those described for Alternative 1 (*FEIS, Pg. 2-15, § 2.2.2.3*).

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The FEIS provides the annual number of T-38C and T-7A aircraft operations for Alternatives 2 and 3 (*FEIS, Pg. 2-14, Table 2-5*) and the annual number of T-38C and T-7A aircraft changes for Alternative 3 (*FEIS, Pg. 2-15, Table 2-6*).

No Action Alternative. The No Action Alternative serves as a baseline against which the impacts of the action alternatives are evaluated. Under the No Action Alternative (*FEIS, Pg. 2-21, § 2.3 and Pg. 2-23, Table 2-9*), the DAF would not implement T-7A recapitalization at Laughlin AFB. Laughlin AFB's existing fleet of T-38C aircraft would continue to be used in their current capacity and they will reach the end of their service lives within the next decade with maintenance requirements continuing to increase, et al.

ENVIRONMENTALLY PREFERRED ALTERNATIVE

The No Action Alternative is the environmentally preferred alternative due to the lowest potential for adverse environmental impacts on air quality, the noise environment, land use compatibility, and environmental justice and sensitive receptor populations. The environmental analysis contained in the FEIS (*FEIS, Pg. 3-1, Chapter 3*) evaluated the number, type, time of day, and power settings of the proposed aircraft operations as well as the inherent air emission and noise characteristics of both aircraft and their engines to conclude that each of the three action alternatives would have a net increase in air pollution and noise on the affected population when compared with existing conditions.

COORDINATION AND CONSULTATION

As described more completely in the FEIS (*FEIS, Pg. 3-64, § 3.4, Pg. 3-76, § 3.5, and Appendix B*), DAF coordinated and completed consultations with federal and state agencies and federally recognized tribes during the EIS process.

MITIGATION

The FEIS (*FEIS, Pg 3-1, Chapter 3*) describes the environmental resources and baseline conditions that the Proposed Action could affect, presents an analysis of the potential environmental consequences from the three action alternatives and the No Action Alternative, and addresses mitigations that could avoid, minimize, or compensate for effects caused by a proposed action.

To track mitigations, AETC will develop a Mitigation Plan within 90 days of the signature of this ROD that identifies principal and subordinate organizations with responsibility for oversight and execution of specific mitigations. The DAF will not implement an impact-inducing action related to the MOB 3 recapitalization before the applicable mitigation measure described in this ROD are funded and put in place.

The Mitigation Plan will:

- Identify specific mitigative actions.
- Identify the organization responsible for each mitigation.
- Present the timing of and completion for each mitigation.

T-7A recapitalization at Laughlin AFB could impact several resource areas, but not significantly. The AETC Proponent will mitigate short- and long-term impacts as generally

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discussed in scoping comments received/draft EIS public comments and DAF responses (*FEIS, Pg. 4-3/4-6 and Tables 4-1/4-2, respectively*) and with continued implementation of existing noise abatement procedures and strategies (*FEIS, Pg. 3-36, § 3.3.1.1.3*).

DAF mitigations include best management practices (BMPs) and those requirements to comply with related revisions to Stormwater Pollution Prevention Plan; Spill Prevention, Control, and Countermeasure Plan; Hazardous waste Management Plan; the NPDES Construction General Permit; and updates to and compliance with Bird/Wildlife Aircraft Strike Hazard Plan.

During scoping, the National Park Service (NPS) requested mitigation measures be developed for impacts on dark night sky at two NPS-managed properties, threatened and endangered species, and bats and migratory birds from aircraft strikes. The analysis performed for the EIS determined that no mitigation measures were required to address these impacts as generally reflected in the FEIS (*FEIS, Pg. 3-71, § 3.4.2.1; Pg. 3-116, § 3.9.2.1; and Pg. 3-134, § 3.12.1*).

Environmental impacts from Alternative 3 are bulleted as follows:

- Short- and long-term, not significant, adverse impacts on the noise environment would occur. The short-term impacts would be from noise generated by heavy equipment during construction, and the long-term impacts would be from the introduction of the noisier T-7A aircraft and operations in the training program. Operational noise would increase areas of incompatible land use on and adjacent to Laughlin AFB (*FEIS, Pg. 3-38, § 3.3.2 and Pg. 3-90, § 3.6.2*).
- Short- and long-term, not significant, adverse impacts on air quality would occur. The short-term impacts would be from the use of heavy equipment during construction, and the long-term impacts would be from operation of new facilities and T-7A flight operations. Criteria pollutant emissions would not exceed insignificance indicators. No future climate scenario or potential climate stressor would have significant effects on any element of T-7A recapitalization at Laughlin AFB (*FEIS, Pg. 3-11, § 3.2.2*).
- Unavoidable long-term, disproportionately high and adverse impacts on environmental justice and sensitive receptor populations would occur from increased noise and air emissions within three of the six Census Block Groups that coincide with the 65 A-weighted decibels noise zone for Alternative 3. Aircraft noise would result in a higher number of classroom learning interference events and an increase in the time above metric at four schools creating a disproportionate, adverse impact on children (*FEIS, Pg. 3-130, § 3.11.2*).
- No significant impacts would occur on biological resources and cultural resources (*FEIS, Pg. 3-69, § 3.4.2 and Pg. 3-81, § 3.5.2*). As noted in the Coordination and Consultation section (*FEIS, Appendix B*), DAF consulted with the USFWS, Texas SHPO, and potentially affected tribes to obtain concurrence with DAF's no effect determination.
- No significant impacts would occur on all other resource areas, which include airspace, geological resources, socioeconomics, hazardous materials and wastes, infrastructure and transportation, safety, and water resources (*FEIS, Pg. 3-1 § 3, Pg. 3-99, § 3.7.2, Pg. 3-105, § 3.8.2, Pg. 3-115, § 3.9.2, and Pg. 3-122, § 3.10.2*).

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Once the T-7A aircraft begin to arrive at Laughlin AFB, AETC will (1) analyze T-7A flying patterns and operational settings, (2) update the installation's AICUZ plan, and (3) support the community in developing a Joint Land Use Study for the installation and surrounding community. These actions allow AETC to continue its active AICUZ program at Laughlin AFB, which strives to pursue operational measures to effectively control aircraft noise and recommend specific actions for local jurisdictions to enhance the health, safety, and welfare of those living near the installation.

DECISION

After considering the potential environmental consequences of T-7A recapitalization at Laughlin AFB, comments, and concerns of the public and other key stakeholders, as well as other factors related to national defense, including current military operational needs and costs, DAF will, by this decision, replace all T-38C aircraft at Laughlin AFB with up to 79 T-7A aircraft, limiting initial delivery to 51 aircraft per the Secretary of the Air Force Strategic Basing Decision approving Laughlin AFB as the third T-7A MOB.

DAF will execute all portions of T-7A recapitalization at Laughlin AFB including the operations and changes to the number of personnel and dependents as defined for Alternative 3 as discussed above and in the FEIS. Alternative 3 is selected to provide sufficient operational capacity for DAF to sustain pilot training and add a Fighter/Bomber Fundamentals curriculum to the training program. The final facilities implementation (construction or renovation) will depend on the funding level and priorities in the overall T-7A program. DAF has adopted all practicable means to avoid or minimize environmental harm.

ROBERT E. MORIARTY, P.E., SES

Date

Deputy Assistant Secretary of the Air Force (Installations)