



MARINE CORPS AIR STATION BEAUFORT

Nomination for

Secretary of Defense/Secretary of the Navy

2014 Environmental Awards

Townsend Bombing Range Integrated Planning Team



INTRODUCTION

Marine Corps Air Station (MCAS) Beaufort, South Carolina, is home to and base of operations for Fleet Marine Force units of the Second Marine Aircraft Wing (2nd MAW) and the Second Force Service Support Group. Marine Aircraft Group 31 (MAG-31), composed of six operational of F/A-18 squadrons, is the principal tenant at MCAS Beaufort. In 2014, MCAS Beaufort received its first training squadron of the F-35B Lightning Joint Strike Fighter.



The mission of MCAS Beaufort is to maintain and operate facilities in support of flight operations and to provide services and material to support MAG-31, associated 2nd MAW units, and other activities and units as designated by the Commandant of the Marine Corps, in order to set the conditions for the enduring success of our supported commands and their missions.

Townsend Bombing Range (TBR), Georgia, is the primary air-to-ground training range for aviation units stationed at MCAS Beaufort. TBR is a 5,183-acre federal property owned by MCAS Beaufort and currently operated by the Georgia Air National Guard (GAANG). TBR is located within the local flying area of MAG-31, an area defined as the maximum distance an aircraft can travel, complete its mission, and return to base without refueling or landing. MAG-31 utilizes the air-to-ground training at TBR to remain mission-ready. TBR also supports training for other aviation units in the Marine Corps, as well as the U.S. Air Force, the U.S. Army, the U.S. Navy, and the Air National Guard (ANG).

BACKGROUND



TBR currently accommodates only 47% of Marine aviators' air-to-ground training requirements for the F/A-18 and does not allow for delivery of inert (non-explosive) precision guided munitions (PGM) under realistic training scenarios. In May 2003, MAG-31 submitted a Universal Needs Statement (UNS) requesting an east coast PGM range capability. The Marine Requirement Oversight Council (MROC) established this requirement in February 2009 and concurred with the concept of expanding TBR.



The National Environmental Policy Act (NEPA) of 1969, Council on Environmental Quality (CEQ) guidelines and Department of the Navy (DON) policy require the preparation of an Environmental Impact Statement (EIS) and the solicitation of public input through public meetings and comment periods when a project may have a significant impact on environmental resources, including socioeconomic resources. In accordance with these regulations, MCAS Beaufort completed the EIS process to evaluate the environmental effects of a range of reasonable alternatives to accommodate the PGM training requirement at TBR.

PROJECT HIGHLIGHTS

Integrated Planning Team for the Environmental Impact Statement



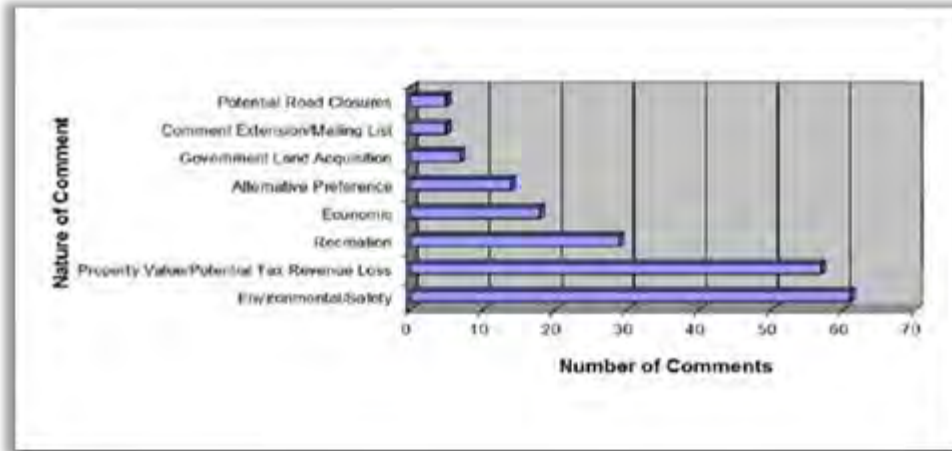
The success of the project hinged on the establishment, commitment, and innovative actions of the Integrated Planning Team (IPT), led by MCAS Beaufort. MCAS Beaufort's IPT streamlined communication and pooled expertise across various commands and agencies including: MAG-31, Marine Corps Command (MCICOM), Marine Corps Installations East (MCIEAST), Training and Education Command (TECOM), Office of Legislative Affairs (OLA), Naval Facilities and Engineering Command Southeast

(NAVFAC SE), and GAANG, with contract support from Ecology and Environment and Marstel- Day, LLC.

Team members brought expertise in environmental/natural resources affairs, cultural resources, community planning/liasing, public affairs, real estate, training and operations, and policy and compliance. To achieve a ROD successfully, the IPT spearheaded strategic coordination and engagement with external stakeholders, including: McIntosh and Long Counties, the Coastal Regional Commission, the State of Georgia Department of Natural Resources, Georgia State Historic Preservation Office (SHPO), the Federal Aviation Administration (FAA), U.S. Fish and Wildlife Service, U.S. Forestry Service, Native American Tribes, and The Nature Conservancy.

Scoping Study:

A Notice of Intent (NOI) to produce an EIS on the project was published in the *Federal Register* on August 6, 2010. The NOI officially initiated a Public Scoping Period. A key component of the EIS process is providing opportunities for public review and comment. The TBR team notified federal, state, and local government agencies, elected officials, Native American tribal organizations, non-government organizations, and individuals most likely to be interested in the expansion, and those who requested a point of contact for communication regarding information applicable to the project. The IPT held two open house public meetings during the Public Scoping Period. The IPT received 110 public comments on the proposed action and alternatives during the public scoping process from interested parties, covering a variety of topics (noted in the chart below). Over half of the comments mentioned concern with potential socioeconomic impacts, specifically the potential loss of tax revenues.



This initial interaction with interested parties helped shape the studies supporting the development of the EIS and established important open communications between the Marine Corps and those parties. The IPT identified initial partners for the development of the EIS and interaction with the public and agencies. By May 2012, the GAANG, FAA, and U.S. Army Corps of Engineers (USACE) all accepted to participate as cooperating agencies in the EIS development.

Draft Environmental Impact Statement:

The IPT’s continued collaboration of expertise and consideration for stakeholder input provided for the efficient and successful production, completion, and public release of the Draft EIS. The Draft EIS presented the initial analysis of all available information and required factors, and its development highlighted the significance of key partnerships between the Marine Corps and other agencies to accurately research and evaluate the proposed alternatives for the expansion. Notably, the IPT worked with USACE in the initial assessments of the study areas. Results identified regions in one area of study that failed to meet the minimal training requirement and was inaccessible for range maintenance and clearance due to experienced frequent flooding. The IPT removed this area from further analysis in the EIS. Its removal led to the creation of a fourth alternative, which the IPT determined as the “Preferred Alternative,” a way forward that offered the best balance of operational capability and potential impacts to the environment.



A Notice of Availability (NOA) for the Draft EIS was published in the Federal Register on July 13, 2012, which officially initiated a second Public Comment Period. In conjunction with the NOA, the IPT undertook an extensive stakeholder notification process, which included: hand-delivered letters to Congress; a direct mailing campaign to notify state and local government, nongovernmental agencies, special interest groups, and members of the public; the availability of detailed information on the project’s public Web site; advertisements in four local newspapers; a press release; and running a notice on the local television station. The IPT made available the full Draft EIS to stakeholders in various forms (print, electronic, etc.) to accommodate all parties. The IPT also produced public documents to highlight key project facts and updates, including detailed answers to frequently asked questions.



The IPT held two more open house meetings in the affected counties as another opportunity for interested parties to learn about and provide comment on the expansion. Six information stations were set up and staffed by Marine Corps, Navy, and GAANG personnel to allow individuals the unique opportunity to interface with technical experts on each area of the project. The IPT reviewed a total of 100 public comments submitted on the Draft EIS via post, email, project Web site, and at the public meetings. The majority of comments mirrored those received during scoping. Though many comments expressed support in the project, concerns again primarily focused on the potential socioeconomic impact (loss of tax revenue, effects to property taxes/values).

Final Environmental Impact Statement:

All the preceding efforts set the stage for the IPT’s successful completion of the EIS process, which allowed the expansion project to proceed. Taking comments from the Draft EIS into consideration, the IPT reviewed the analysis and worked through any remaining technical issues.

The Final EIS was released to the public March 22, 2013. Fundamentally unchanged from the Draft EIS, the Final EIS incorporated minor adjustments that improved the clarity, accuracy, and thoroughness of the analysis presented in the Draft EIS. There were no changes to conclusions in the analysis concerning the nature or magnitude of impacts on any resources.

A 30-day waiting period followed the release of the Final EIS. The waiting period was the final opportunity for comment, and the IPT received 26 comments, 12 of which were supporting or not voicing concerns with the expansion. The EPA Region IV noted that the Final EIS addressed their initial comments and that they rated the EIS as “Lack of Objections,” signifying approval. Likewise, the U.S. Department of Agriculture Natural Resources Conservation Service and Georgia Department of Natural Resources (Wildlife Resources Division) officially stated they had no additional comments or concerns on the Final EIS. Even with these





required concurrences, comments during the 30-day waiting period expressed concern with the potential socioeconomic impacts and loss of taxes, as well as concerns about potential cultural and historical resources in the acquisition properties.

Record of Decision:

On January 17, 2014, the DON signed its Record of Decision (ROD) on the Final EIS. The ROD documents the DON’s decision to proceed with the expansion of the 5,183-acre range by 28,630 acres and a modernization plan that offers the best balance of operational capability and potential impacts to the environment. The graphic on Page 4 shows this selected alternative. In response to the public’s most frequently cited concern, the DON acknowledged the potential loss of tax revenues to local governments resulting from the expansion and recognized tax loss as a significant impact to the community and counties where the soon-to-be-expanded TBR resides. In an effort to continue the commitment to working with neighbors and stakeholders, the Marine Corps worked to find a way to help mitigate the concerns of Long and McIntosh Counties. The signed ROD reflects the IPT’s successful efforts to evaluate alternatives and environmental impacts of expanding and modernizing the range to support a critical mission need.

Engagement with McIntosh and Long Counties

Final EIS analysis identified socioeconomics as the one resource area on which the expansion would have a significant environmental impact; specifically, the negative impact the expansion would have on property tax revenues in McIntosh and Long Counties. Acquisition, construction, and additional survey work were determined to provide direct and indirect benefits to the local and state economy, with a total construction-related impact of \$12.8M. Additionally, the expansion will add 12 new full-time jobs, providing a minor long-term benefit to the region. However, the loss of taxes (shown in the table below) would prove a more difficult challenge.

	Long County	McIntosh County	Total
Total Area (acres)	258,240	367,680	625,920
Area Acquired (acres)	20,110	8,520	28,630
Annual Tax Loss (\$)	131,318	35,469	166,787
Percent Total Taxes	3.42	0.60	1.71

Research during the NEPA process determined that unlike other federal agencies there were no existing legal mechanisms for the Marine Corps to compensate local governments for the loss of tax revenues resulting from the conversion of privately owned lands to federal ownership. Members of the IPT worked with DON leadership to generate possible alternative, innovative solutions that the Marine Corps could implement within existing statutory authorities. The IPT members collaborated on multiple occasions with representatives from McIntosh and Long Counties to present these ideas that could address issues of mutual concern. Discussions converged on the potential for the Marine Corps to construct a fire station and emergency response facility in each county to support the fire and emergency response needs of the counties, as well as TBR. McIntosh County accepted the facility, while Long County continues to plan for and review the opportunity with its residents. The Marine Corps remains engaged with both counties to keep them apprised of project updates and answer any questions or concerns. These efforts nullified Congressional and Navy leadership’s concerns and led to the final decision to approve the expansion.



Cultural Resources – Georgia SHPO Programmatic Agreement

Cultural resource assessments are required for projects such as the TBR expansion and modernization to evaluate the historical nature of the properties. These assessments can be very time-consuming and resource-intensive. The Marine Corps formulated an innovative strategy in concert with the Georgia State Historic Preservation Office (SHPO) that would facilitate immediate and future development of the acquitted properties. The IPT consulted twenty-one federally recognized Native American Tribes and other stakeholders and worked with the Georgia SHPO to develop, sign, and implement a programmatic agreement (PA) between the Marine Corps (TBR) and the State to satisfy the Section 106 compliance requirements of the National Historic Preservation Act (NHPA) of 1966, as amended. The PA streamlines this process for current and future development projects.



All federal agencies must identify historic properties on the lands that they own. While review of records and maps can be used to identify the location of significant resources, costly and time-consuming on-the-ground surveys are normally needed to identify archaeological resources. The PA, which codifies Marine Corps cultural resource management requirements, contains several key provisions that will save the Marine Corps resources (time and money), and eliminate delays in the implementation of management activity. The PA allows the assessments to proceed in stages: the areas where there

will be disturbance (targets, roads, and facilities) must have full surveys under NHPA Section 106 completed before the activities begin, while the remainder of the property (greater than 30,000 acres) can proceed with cultural resource surveys under NHPA Section 110. This aspect of the PA is a provision to develop a sampling strategy in consultation with the SHPO to survey the Weapons Danger Zones (WDZ) and buffer zones, which constitute the vast majority of lands the Marine Corps will acquire, in accordance with NHPA Section 110. By treating the requirements for identification within the WDZ's and buffer zones in accordance with NHPA Section 110, the Marine Corps can survey these areas, as funds are available. The Marine Corps will be developing a survey sampling strategy with the SHPO for the lands acquired, using an archaeological predictive model to provide a sound basis on which to identify areas for future survey and meet identification requirements.

The PA exempts natural resources management and forestry activity (pre-existing firebreak plowing, timber harvesting and re-planting activity) from NHPA Section 106 survey compliance. This exemption is critical for efficiently moving the project forward. The exemption is allowed provided ground disturbance from these activities is not greater than that of historical land use or does not disturb areas where this activity has not previously occurred. Finally, this provision for the property not being disturbed allows acquisition of the property before the surveys are conducted and continuation of the current practices on those properties, including timber harvesting and planting. This agreement has and will save countless hours and cost to the historical preservation assessments for the properties.



Next Steps – Continued Cooperative Efforts

With the signing of the ROD and mitigation efforts, the Marine Corps is moving forward with the following key action items to bring the TBR modernization to fruition:

- *Acquisition of Land.* Pending Congressional appropriations, the Marine Corps will acquire 28,630 acres of land in McIntosh County (8,520 acres) and Long County (20,110 acres). A sufficiently sized land area at TBR will maintain public safety, enable the required training delivery of PGM, and allow for more realistic and effective training on a wider array of target types for greater aircrew competency.
- *Termination of a Timber Easement.* The Marine Corps will pay fair market value to McIntosh County to terminate a 3,007-acre timber easement held by McIntosh County on DON-owned land within the current TBR boundary. To ensure the safety of TBR personnel and the public, it is necessary for DON to own all the timberland within TBR and to manage it in support of mission requirements.
- *Modification of Existing Restricted Airspace.* The Marine Corps submitted a request to the FAA for the modification of Restricted Area R-3007 airspace by extending the current 100-foot floor to ground level over the land to be acquired to match the existing restricted airspace over the current range. The purpose of this additional airspace is to unite the airspace with acquired land to enable the delivery of inert ordnance and to exclude non-participating aircraft from intruding into hazardous operations, as required by FAA regulations. The FAA will be undertaking this process over the coming year.
- *Construction of Infrastructure to support PGM training.* The modernization will include the installation of target scoring equipment, tower construction, roadway construction/improvement, and six new target areas, also pending Congressional appropriations. This action will allow the enhancement of current training capabilities by accommodating full-scale inert weapons; enabling the use of inert PGM; and increasing weapons delivery parameters by providing multiple run-in headings (i.e., aircraft direction during ordnance delivery).

Once the expansion and modernization is complete, TBR will be the premier training range on the East Coast, significantly enhancing the Marine Corps' aviation training and readiness proficiency in the use of PGM.