

Draft FINDING OF NO SIGNIFICANT IMPACT
SUPPLEMENTAL ENVIRONMENTAL ASSESSMENT
HIGH ANGLE ARTILLERY FIRING AND
ESTABLISHMENT OF RESTRICTED SPECIAL USE AIRSPACE (R-7001D)
AT CAMP GUERNSEY, WYOMING

INTRODUCTION

In 2020, the Wyoming Army National Guard (WYARNG) prepared an Environmental Assessment (EA) pursuant to the National Environmental Policy Act (NEPA) that analyzed: 1) proposed training and maneuver activities (including proposed field artillery training, maneuver activities, and other live-fire exercises and ranges); and 2) the addition of new areas of Restricted Special Use Airspace (e.g. Restricted Area – RA) at Camp Guernsey. The Army National Guard Directorate (ARNG), as the lead agency, subsequently issued a Finding of No Significant Impact (FONSI) on 16 MAR 2020 concluding that firing field artillery would not result in a significant adverse environmental impact. The FAA agreed to be a NEPA cooperating agency on this EA in a letter dated November 19, 2018 to the Department of Army, U.S. Army Aeronautical Services Agency. The Federal Aviation Administration (FAA), as a cooperating agency, also issued a FONSI/Record of Decision (ROD) on 3 AUG 2020 concluding that adding additional RA at Camp Guernsey would have no significant environmental impact. The FAA published a Notice of proposed rulemaking (NPRM) in the Federal Register on March 4, 2021 (FR Vol. 86, No. 41) for *Proposed Amendment of Restricted Area R-7001C and Establishment of Restricted Areas R-7001D, R-7002A, R-7002B, and R-7002C; Guernsey, WY*. This NPRM requested that comments on this proposed rulemaking be received before April 19, 2021. FAA received no comments on this proposed rulemaking. FAA anticipates the Final Rule to be published in the Federal Register in the fall of 2021.

Since that time, the WYARNG has proposed additional actions: 1) allow high angle artillery firing; and 2) acquire and utilize an additional higher elevation of RA. The WYARNG has prepared an EA for these new proposals that supplements the analysis completed in the 2020 Training and Maneuver EA. This supplemental EA describes the current Proposed Action, the purpose and need for the Proposed Action, and alternatives to the Proposed Action. In keeping with the NEPA mandate to “tier” subsequent NEPA analysis to eliminate repetitive discussion and reduce duplication, this supplemental EA concisely summarizes the previous environmental impact analysis and incorporates by reference the detailed affected environment and environmental consequences sections presented in the 2020 Training and Maneuver EA.

DESCRIPTION OF THE PROPOSED ACTION

Field artillery units from several states and military services training at Camp Guernsey would conduct the proposed high-angle artillery firing. Army Techniques Publication No. 3-09.50, *The Field Artillery Cannon Battery* (DA 2016) defines “high-angle” to be an angle of elevation greater than 800 mils (a mil is the angle of site in the cannon aiming circle expressed in millimeters). All firing would take place from existing indirect fire areas and the projectiles would impact (strike the ground) in the existing duded impact area in the North Training Area at Camp Guernsey. There would be no increase in the number of rounds fired. The WYARNG has projected the annual average number of 155 millimeter (mm) rounds to be fired at 11,664. There are no proposed changes to any other Camp Guernsey training activity including aircraft operations.

High-angle artillery firing could occur at an elevation greater in height than the longstanding current RA's at Camp Guernsey (R-7001A/B/C). The WYARNG requires an additional higher elevation of RA to complete this high-angle firing. This new RA (R-7001D) is proposed to be placed above the longstanding current RAs (R-7001 A/B/C). The elevation of the new RA would be from 30,001 – 45,000 feet above Mean Sea Level (MSL). This proposed new RA would not be placed over the three RAs analyzed in the 2000 Training and Maneuver EA (R-7002 A/B/C). WYARNG would activate R-7001D approximately 20 days a year.

The WYARNG would establish and manage the proposed RA in accordance with FAA Order JO 7400.2M *Procedures for Handling Airspace Matters* (FAA 2019); Army Regulation (AR) 385-63 *Range Safety* (DA 2012); and AR 95-2 *Air Traffic Control, Airfield/Heliport, and Airspace Operations* (DA 2016).

PURPOSE OF AND NEED FOR THE PROPOSED ACTION

The purpose of high-angle artillery firing is to train field artillery crews training at Camp Guernsey on the tactics, techniques, and procedures for firing into or out of deep defilade (the protection of a position, vehicle, or troops against enemy observation or gunfire) such as that found in heavily wooded, mountainous, and urban areas. It is also used to fire over high terrain features near friendly troops. This action is needed for field artillery units to meet military training standards set forth in Army Doctrine Reference Publication (ADRP) 3-09 C1 Fires (DA 2013); Army Techniques Publication (ATP) 3-09.30 Observed Fires (DA 2017); Training Circular (TC) 3-09.8 Field Artillery Gunnery (DA 2013); TC 3-09.81 Field Artillery Manual Cannon Gunnery (DA2016); ATP 3-09.02 Field Artillery Survey (DA 2016); ATP 3-09.23 Field Artillery Cannon Battalion (DA 2015); ATP 3-09.24 Techniques for the Fires Brigade (DA 2012); ATP 3-09.50 The Field Artillery Cannon Battery (DA 2016); and Field Manual (FM) 3-09 Field Artillery Operations and Fire Support (DA 2014).

ALTERNATIVES

The WYARNG applied several screening criteria to various alternative actions to determine if they were reasonable for detailed environmental analysis. This process, described in the EA, identified no reasonable action alternatives. This High-Angle Firing EA does analyze the No Action Alternative – which is to not conduct high-angle artillery firing that would extend to higher altitudes than 30,000 ft MSL, and not to add a higher elevation of RA, from 30,001 to 45,000 at Camp Guernsey. The No Action alternative is included in the EA to serve as a baseline against which the proposed action can be compared.

PUBLIC AND AGENCY INVOLVEMENT

WYARNG conducted interagency and public scoping for the 2020 Training and Maneuver EA and all substantive comments were addressed. Per §651.24 of the Army's NEPA regulation at 32 CFR 651.24 and the FAA's NEPA regulation at FAA Order 1050.1F Ch. 9-3, new scoping is not required and was not conducted for this supplemental EA. The WYARNG conducted tribal consultation for this proposed undertaking and received no comments. The WYARNG determined that this undertaking would result in no adverse environmental effects to Historic Properties. In a letter dated May 13, 2021, the Wyoming SHPO concurred with the no adverse effect determination.

ENVIRONMENTAL CONSEQUENCES

As described in the 2020 Training and Maneuver EA and the 16 MAR 2020 FONSI, the ARNG determined that firing field artillery in the North Training Area would not result in a significant adverse environmental impact. There have been no changes to any resource areas at Camp Guernsey since this 2020 Training and Maneuver EA. The WYARNG did not identify any controversial or significant issues in this supplemental EA. The proposed high-angle field artillery action includes no changes to field artillery firing locations, impact areas, number of rounds fired or any other training activity, including aircraft operations. The proposed RA action (R-7001D) would be located directly above the longstanding current RA's (R-7001A/B/C), not the three new RAs analyzed in the 2020 EA. The WYARNG anticipates activating this proposed new RA 20 days per year. The analysis completed in this supplemental EA demonstrates that high-angle artillery firing in the North Training Area of Camp Guernsey would not result in a reasonably foreseeable significant adverse environmental impact. The analysis completed in this supplemental EA has also concluded that establishment of R-7001D over the North Training Area of Camp Guernsey would not result in a reasonably foreseeable significant adverse environmental impact.

MITIGATION MEASURES

This supplemental EA concludes that the proposed high angle artillery firing and the creation of an additional elevation of RA over Camp Guernsey would not result in a reasonably foreseeable significant adverse effect and mitigation measures would not be necessary to reduce the significance of any effects. The proposed high-angle artillery firing would continue to implement and comply with various WYARNG management plans – including but not limited to the Integrated Natural Resources Management Plan (INRMP), Integrated Cultural Resources Management Plan (ICRMP), Programmatic Agreement (PA) for Section 106 Compliance, Integrated Wildland Fire Management Plan (IWFMP), Integrated Training Area Management Plan, Hazardous Waste Management Plan, Camp Guernsey Airfield Industrial Storm Water Pollution Prevention Plan, and Cantonment Storm Water Pollution Prevention Plan – which guide the implementation of management activities and standard Best Management Practice's (BMP's) at Camp Guernsey (see Appendix D in 2002 Training and Maneuver EA).

FAA DECISION-MAKING

The FAA is responsible for managing navigable airspace for public safety and ensuring its efficient use for commercial air traffic, general aviation, and national defense, including RA utilized by the DoD. Consequently, the FAA is the decision-making authority regarding the proposed RA (R-7001D). The FAA published a Notice of proposed rulemaking (NPRM) in the Federal Register on March 4, 2021 (FR Vol. 86, No. 41) for Proposed Amendment of Restricted Area R-7001C and Establishment of Restricted Areas R-7001D, R-7002A, R-7002B, and R-7002C; Guernsey, WY. This NPRM requested that comments on this proposed rulemaking be received before April 19, 2021. FAA received no comments on this proposed rulemaking. FAA anticipates the Final Rule to be published in the Federal Register in the fall of 2021.

In accordance with FAA Order 1050.1F and CEQ regulation 40 C.F.R. §1506.3, the FAA will conduct an independent review and evaluation of the WYARNG's EA for the proposed RA. Based on its independent review, the FAA will determine if the EA and its supporting documentation, as incorporated by reference, adequately assess and discloses the environmental impacts of the FAA's Proposed Action and that the adoption of the EA, in whole or in part, by the FAA is authorized under 40 C.F.R. § 1506.3 and FAA Order 1050.1F, section 8-2.

Upon review of the EA, public comments, and applicable interagency and intergovernmental consultation, the responsible FAA official will determine whether any environmental impacts analyzed in the EA are significant. If, the responsible FAA official concludes that the proposed action would not result in significant impacts to the human environment, the responsible FAA official may prepare a FONSI for the signature of the approving official. A FONSI may also be prepared if the responsible FAA official determines that mitigation will reduce impacts below significant levels. The FONSI documents the basis for the FAA's determination that the proposed action would not have significant environmental impacts.

Upon review of the EA, public comments, and applicable interagency and intergovernmental consultation, the responsible FAA official will determine whether any environmental impacts analyzed in the EA are significant. If, the responsible FAA official concludes that the proposed action would not result in significant impacts to the human environment, the responsible FAA official may prepare a FONSI for the signature of the approving official. A FONSI may also be prepared if the responsible FAA official determines that mitigation will reduce impacts below significant levels. The FONSI documents the basis for the FAA's determination that the proposed action would not have significant environmental impacts.

The EA will accompany the proposed FAA rule and be made available with the proposed rule on Regulations.gov. The EA will be issued for public comment concurrent with the public comment period on the proposed rule to the extent practicable (see FAA order 1050.1F, Section 8-3). If the FAA responsible official finds that the FAA's Proposed Action provides the best airspace combination for meeting the needs stipulated in the EA, and that all practicable means to avoid or minimize environmental harm have been adopted the FAA official approves and authorizes all necessary agency action to establish the proposed RA.

CONCLUSIONS

Establishment of RA is a FAA requirement when hazardous activities are conducted in the National Airspace (NAS). The Proposed Action does not establish a precedent for future actions that may have significant effects. Implementation of the Proposed Action would not result in unresolved effects on environmentally sensitive resources. The Proposed Action would not adversely affect cultural or historical resources. The Proposed Action would not adversely affect any species listed under the Endangered Species Act or designated critical habitat. The Proposed Action would not violate any federal, state, or local law or requirements imposed for the protection of the environment. The Proposed Action would not have an adverse effect on areas having special designation or other areas of high environmental sensitivity. The analysis completed in this supplemental EA has concluded that high angle artillery firing in the North Training Area of Camp Guernsey approximately 20 days per year would not result in a reasonably foreseeable significant adverse environmental impact and an ARNG Finding of No Significant Impact (FONSI) is appropriate. The analysis completed in this supplemental EA has also concluded that establishment of R-7001D over the North Training Area of Camp Guernsey would not result in a reasonably foreseeable significant adverse environmental impact and an FAA Finding of No Significant Impact (FONSI) is appropriate.

PUBLIC REVIEW AND COMMENT

The supplemental EA and draft FONSI will be available to review for a 30-day comment period following publication of a Notice of Availability in the Guernsey Gazette, Platte County Record-Times, and the Douglas Budget newspapers. These documents will be available for review on the

Wyoming Military Department website (<https://www.wyomilitary.wyo.gov/>) and at the Guernsey, Wheatland, and Douglas public libraries or a copy may be requested from the WYARNG.

DRAFT FINDING OF NO SIGNIFICANT IMPACT

After any substantive public comments on the EA have been addressed and if I conclude that the Proposed Action will not generate significant controversy or have a significant impact on the quality of the human or natural environment, ARNG-G9 will sign this FONSI and the WYARNG will implement the action. This analysis fulfills the requirements of NEPA, the Council on Environmental Quality *Regulations Implementing the Procedural Provisions of NEPA* (40 Code of Federal Regulations [CFR] Parts 1500-1508); the Army regulations implementing NEPA, *Environmental Analysis of Army Actions* (32 CFR Part 651).

<unsigned for draft>

Date

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COL Anthony Hammett
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