

**FINDING OF NO SIGNIFICANT IMPACT (FONSI)**  
**REAL ESTATE OUTGRANT FOR CHARTER SCHOOL AT**  
**JOINT BASE ANACOSTIA-BOLLING (JBAB), WASHINGTON, DC**

Pursuant to provisions of the National Environmental Policy Act (NEPA), Title 42 United States Code (USC) Sections 4321 to 4347, implemented by Council on Environmental Quality (CEQ) Regulations, Title 40, Code of Federal Regulations (CFR) §1500-1508, and 32 CFR §989, Environmental Impact Analysis Process, the U.S. Air Force (USAF) assessed the potential environmental consequences to accommodate the construction and operation of a public charter school on Joint Base Anacostia-Bolling (JBAB) property serving the District of Columbia and JBAB military families.

The Proposed Action is to accommodate the construction and operation of a public charter school on JBAB property serving DC and JBAB military families. To establish the school on the installation property, the USAF will retain ownership of the property and enter into a real estate outgrant with the Lawndale and Educational and Regional Network (LEARN) Charter School Network. The proposed charter school will be approximately 55,000 square feet with 31 classrooms. Construction would occur in phases, and the school would be completed in 2028 with 550 students and 64 staff members.

An *Environmental Assessment (EA) for Real Estate Outgrant of a Charter School* (Charter School EA) for the Proposed Action was conducted by the Naval Facilities Engineering Command (NAVFAC) Washington, which evaluated in detail the potential environmental impacts associated with two action alternatives, Site 1-Northern Location (Alternative 1), Site 2-Southern Location (Alternative 2) and the No Action Alternative. A FONSI for the Charter School EA was signed by the Navy on **30 September 2020**, and is being adopted by the USAF to inform decisions for current and future proposed actions at JBAB, including the proposed charter school. The Charter School EA analyzed the following resource areas in detail for Sites 1&2: air quality, water resources, cultural resources, infrastructure, transportation, socioeconomics, and environmental justice. Airspace, biological resources, geology and earth resources, land use, visual resources, hazardous materials and waste, and safety and occupational health were considered for potential impacts but eliminated from detailed analysis in the Charter School EA.

The USAF has identified a third action alternative and wishes to include it as part of the Proposed Action. The third Action Alternative, Site 3- Central Location, hereafter referred to interchangeably as Site 3 and Alternative 3 was evaluated in the attached Supplemental *Environmental Assessment (SEA) for Real Estate Outgrant of a Charter School* (SEA) and is now the Preferred Alternative.

This SEA analyzed the following resource areas in detail for Sites 3: air quality, water resources, cultural resources, biological resources, infrastructure, transportation, socioeconomics, and environmental justice. Airspace, geology and earth resources, land use, visual resources, hazardous materials and waste, and safety and occupational health were considered for potential impacts but eliminated from detailed analysis in the attached SEA. The SEA incorporates by reference much of the analysis previously completed in the Charter School EA, as applicable. All resource areas for Alternative 3 were evaluated on their merit while considering the proposed alternate location.

The screening factors for identifying sites that meet the Purpose and Need from the Charter School EA for this action are incorporated by reference in this FONSI. One of the original screening factors in the Charter School EA for siting the proposed charter school location is that it would be along the perimeter of the base for ease of access for non-military students and their families. However, after careful review, The AF determined that Site 3, although it is not directly adjacent to the base perimeter, would be a more suitable alternative. As described in the attached SEA, schoolchildren from non-military families would still be able to access the proposed charter school through the existing South Gate and parents would not need to be vetted. Both the Charter School EA and the SEA are incorporated by reference into this FONSI.

## PREFERRED ALTERNATIVE

Under Alternative 3, the Charter School would be constructed as described in **Section 2.1** of the Charter School EA at Site 3. Site 3 is located near Hickam Village Family Housing along Duncan St. SW within an open field that currently includes a playground [SEA Attachment A – Figure 1]. Trees along the perimeter of the field provide shading and screening for adjacent land uses.

The initial site development would include temporary buildings, perimeter fencing, 26 parking spaces, and utility connections to service the buildings. The permanent facility would consist of a 55,000 square foot building, recreation areas, and parking. At full build out, the total fenced area of the project would encompass 5.7 acres. A shuttle bus from the South Gate would be utilized to transport non-military students to the school site.

## NO-ACTION ALTERNATIVE

The No Action Alternative serves as the baseline against which the Proposed Action can be evaluated to identify impacts to the natural and built environments. Under the No Action Alternative, the proposed charter school would not be constructed on JBAB property. JBAB students would continue to be either home schooled or bused to 33 public and charter schools in DC with commutes of up to 60 minutes each way.

## SUMMARY OF FINDINGS

*Geological Resources, Airspace, Land Use, Visual Resources, Hazardous Materials and Waste, and Public Health and Safety* were not carried forward for detailed analysis in this SEA. Developing the proposed Charter School at Site 3 would not introduce any previously unanalyzed factors that would create a potential for environmental impacts to those resource areas for Alternative 3. Therefore, those resource areas are eliminated from detailed analysis in the attached SEA.

**The Charter School EA identifies certain mitigation measures that would need to be implemented as they apply to Alternative 3 for transportation only.** With the implementation of mitigation measures consistent with those recommended below for transportation and based on the analysis in the attached SEA; the USAF has concluded that no significant adverse effects would occur to the following resources as a result of implementing the Preferred Alternative (Alternative 3).

**Transportation:** Concerning transportation, the Charter School EA included recommended mitigations to minimize impacts to transportation.

Potential mitigations for truck traffic during construction for both Sites 1 and 2 are recommended in **Section 3.6.2.3** of the Charter School EA and in the Transportation Study. These mitigations would apply to Site 3 as well and include:

- Contractually limit construction workers to park within the construction sites, designated overflow areas, and laydown areas.
- Contractually limit the construction contractors to stagger truck arrivals to prevent trucks from potentially blocking the road while waiting to access the site.
- Provide signs to alert pedestrians of closed sidewalks and direct them to temporary or alternative existing sidewalks through construction zones.
- Construction contractors would install temporary barriers to protect pedestrians from vehicular traffic in areas where sidewalks are narrowed or shifted closer to the roadway.
- Any sidewalk shifts or closures would include signs to alert potential users of the pending sidewalk system changes.

The Navy coordinated with District Department of Transportation (DDOT) for a transportation study and to determine mitigations for Site 1 & 2 in the Charter School EA. In developing this SEA, the USAF re-initiated consultation with DDOT to request the agencies opinion on any additional mitigation measures specific to Site 3. DDOT responded to consultations on **4 December 2020**. Correspondence between the USAF and DDOT is included in **Attachment B of the SEA**. Per DDOT's response, the following mitigation measures would be implemented in coordination with DDOT for the Preferred Alternative – Site 3:

- 1) DDOT has requested that the school collaborate with DDOT on a detailed pick-up/drop-off plan that includes strategies to ensure vehicles do not queue back into Overlook Avenue SW. These strategies may include signalization at the South Gate where pick-up/drop-off occurs, if warranted and approved by DDOT, or additional striping, signage, and transportation demand management measures.
- 2) Since Alternatives 2 and 3 are a similar distance walk from the Chesapeake Street / Overlook Avenue intersection, DDOT requested the same three Chesapeake Street SW pedestrian network improvements from Alternative 2, noted in the **26 May, 2020** letter [**Charter School EA- Appendix B**] for the Charter School EA, be made with Alternative 3 to ensure students living in the adjacent Bellevue neighborhood can easily and safely walk to the site. These mitigations include:
  - Widen sidewalk on southern side of Chesapeake Street SW
  - Install crosswalk with curb ramp across Chesapeake Street from east side of 2<sup>nd</sup> street SW
  - Narrowing the apron of the I-295 on-ramp on Chesapeake Street SW to reduce high-speed turns.
- 3) Further, DDOT recommends the sidewalk along the west side of Overlook Avenue linking from Chesapeake Street SW northward to the JBAB South Gate be straightened out and upgraded to meet the Americans with Disabilities Act (ADA) minimum width or, if possible, 6-foot wide in accordance with DDOT's Design and Engineering Manual (DEM 31.2). Accompanying the upgraded sidewalk, modern ADA ramps and high visibility crosswalks should also be installed on the western leg of the Chesapeake Street / Overlook Avenue intersection.

LEARN will comply at its expense with all of the on- and off-base mitigations identified by DDOT; compliance with these mitigation measures will be a condition of the lease LEARN signs with the USAF. A Mitigation Plan will be completed by LEARN and submitted for USAF approval within 90 days of the FONSI being signed. (The original EA identified LEARN as the responsible entity for implementing mitigations, in coordination with DDOT and the Navy.) As Lead Agency, the USAF will assume the coordination role for mitigations, formerly the responsibility of the Navy.

With implementation of mitigation measures, impacts on pedestrian and bicycle networks would be beneficial and adverse impacts on traffic would be mitigated to less than significant impact.

**Air Quality:** There would be short-term, minor air emissions during construction, and long term minor air emissions from facility operations and commuters. Air Conformity Applicability Model (ACAM) for Alternative 3 is provided in **Attachment C of the SEA**. No significant effects on Air Quality as a result of the Proposed Action would occur.

**Noise:** Implementation of Alternative 3 would result in minor impacts on the noise environment and would not be significant.

**Infrastructure/Utilities:** Implementation of Alternative 3 would result in minor increases to utility consumption that would not be significant and would not result in a significant impact to infrastructure.

**Cultural Resources:** The USAF has coordinated with the District of Columbia State Historic Preservation Office (DC SHPO) to develop a Programmatic Agreement (PA) to ensure that any potential effects to the built environment and to potential NRHP eligible archaeological sites within the APE would be evaluated. According to the PA, the USAF would provide final construction plans to the DC SHPO allowing them 30 calendar days to review. The USAF would coordinate with the DC SHPO on the final exterior site plans; to ensure that there would be “no adverse effect” to the historic built environment.

Per the PA, the USAF would ensure that a phased archaeological investigation to identify archaeological resources would be conducted prior to any ground disturbing activities within the APE. The USAF and the DC SHPO have agreed that the undertaking may be implemented in accordance to the PA, dated **15 January 2021**, and is included in **Attachment B of the SEA**.

**Biological Resources:** No effects to rare, threatened, or endangered species are anticipated. There is little potential habitat located at Alternative 3, similar to the determination made for Alternatives 1 and 2. Trees present at Alternative 3 may offer marginal roosting habitat for the Northern Long-Eared Bat (*Myotis septentrionalis*). Any required tree removal would occur outside the pup season (June 1-July 31) to avoid potential impacts to bat species who happen to have a roost tree on the project site. Trees removed during development will be replaced at a 1:1 ratio in accordance with the installation’s tree removal policy. Correspondence with the USFWS regarding Alternative 3 is provided in **Attachment B of the SEA**.

**Socioeconomics:** Implementation of any of the alternatives, including the Site 3 alternative would result in minor, beneficial impacts that would not be significant to socioeconomics conditions in the ROI.

**Environmental Justice:** There would be no potential for disproportionate impacts to occur that would significantly affect human populations, low income, minority, or otherwise. There would be a potential for minor beneficial impacts that would not be significant to these communities due to the creation of jobs associated with running of the charter school and an additional option for families with school-age children in the local area.

**Water Resources:** If Alternative 3 is implemented, construction contractors would be responsible for adhering to the measures for water quality associated with construction practices as described in the Charter School EA for Sites 1 and 2. Alternative 3 contains no wetlands; however, it is located in a 500-year floodplain. All measures associated with construction would be taken for building in a 500-year floodplain, and there would be minimal long term and short term effects on water resources for the Proposed Action.

**Consultation and Coordination with Indian Tribal Governments:** To date, no traditional cultural properties or American Indian sacred sites have been recorded at JBAB. The Delaware Tribe of Indians and the Delaware Nation have requested to be notified for undertakings at JBAB that may involve archaeological resources. The Air Force has notified the Delaware Tribe of Indians and the Delaware Nation that an archaeological survey within the Area of Potential would be coordinated with the DCSHPO as per the PA. To date, the Delaware Tribe of Indians responded in an email dated **13 January 2021** stating that they “have no historic or cultural resources in DC and have no objection to the proposal”. The USAF will notify the Delaware Nation if any archaeological resources are discovered during the survey. Any correspondence with the Delaware Nation and the Delaware Tribe of Indians pertaining to this undertaking is provided in **Attachment B** of the SEA.

## **FINDING OF NO SIGNIFICANT IMPACT (FONSI)**

Based on my review of the facts and analyses contained in the attached SEA, conducted under the provisions of NEPA, CEQ Regulations, and 32 CFR §989, I conclude that the Proposed Action of the construction and operation of a public charter school on JBAB property serving the DC and military families would not have a significant environmental impact. Additionally there would be no significant environmental consequences that would result from environmental trends or planned actions which are

reasonably foreseeable and have a close causal connection to the Proposed Action. Accordingly, an Environmental Impact Statement is not required. The signing of this FONSI completes the environmental impact analysis process.

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RICKY N. RUPP  
Major General, USAF  
Commander, Air Force District of Washington

19 January 2021

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Date