

## RECORD OF DECISION

### *ENVIRONMENTAL IMPACT STATEMENT FOR DEPARTMENT OF THE AIR FORCE COMPREHENSIVE AIRSPACE INITIATIVE MOODY AIR FORCE BASE, GEORGIA*

#### **INTRODUCTION**

The Department of the Air Force (DAF) is issuing this Record of Decision (ROD) to implement the Comprehensive Airspace Initiative at Moody Air Force Base (AFB). This ROD is based on the *Final Environmental Impact Statement, Moody Comprehensive Airspace Initiative, Georgia*, April 2023 (Federal Register, Vol 88, No 97, pg. 32215). The decision to configure new low-altitude Military Operations Areas (MOAs) considered the information, analysis, and public and other comments contained in the Final Environmental Impact Statement (EIS), along with other relevant factors.

This ROD is prepared in accordance with the Council on Environmental Quality (CEQ) regulations implementing the National Environmental Policy Act (NEPA) at Title 40 Code of Federal Regulations (CFR) Section 1505.2 (*Record of decision in cases requiring environmental impact statements*)<sup>1</sup> and 32 CFR Part 989, implementing the DAF Environmental Impact Analysis Process. The DAF is the Lead Agency, and the Federal Aviation Administration (FAA) is a Cooperating Agency.

Specifically, this ROD documents the following:

- DAF's decision;
- The alternatives considered by the DAF in reaching the decision and the alternative considered environmentally preferable;
- Relevant factors that were considered among the alternatives and how those factors entered into its decision;
- Whether all practicable means to avoid or minimize impacts on the environment resulting from the selected alternative have been adopted, and if not, why they were not; and
- Adoption and summary of applicable environmental protection measures.

The FAA is responsible for evaluating, processing, and charting airspace. As a Cooperating Agency, the FAA can adopt, in whole or in part, the DAF's Final EIS, as the required NEPA documentation to support FAA decisions on establishment of low-altitude MOAs. The DAF will request that the FAA issue its ROD and chart the low-altitude MOAs of the Moody Airspace Complex as soon as practicable after DAF issues this ROD.

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<sup>1</sup> Note: This EIS was ongoing prior to the 14 September 2020 effective date of the CEQ's final rule updating its regulations for implementing the procedural provisions of NEPA. Accordingly, the revised CEQ regulations were not used for this action pursuant to 40 CFR § 1506.13.

## **DECISION SYNOPSIS**

The DAF selected Modified Alternative 1: Create New MOAs with a 1,000-Foot Floor with Modified Lateral Boundaries, Create a New Grand Bay MOA, and Lower the Floor of Moody 2 North MOA, which is also the preferred alternative. The DAF, by this decision, will request that the FAA chart the Modified Alternative 1 airspace. Modified Alternative 1 creates new low-altitude MOAs beneath the existing Moody Airspace Complex MOAs located within south-central Georgia and northern Florida. Modified Alternative 1 creates the Grand Bay, Corsair North Low, Corsair South Low, Mustang Low, and Warhawk Low MOAs and modifies the existing Moody 2 North MOA. Modified Alternative 1 is detailed in the Final EIS, Volume I, Section 2.4.3, page 2-23, and shown in Volume I, Figure 2.4-5, page 2-25. Modified Alternative 1 would reconfigure low-altitude airspace floors that currently prohibit realistic low-altitude training certification, maintenance training, and practicing simulated employment of weapons delivery at low altitudes to improve lethality; provide realistic threat reaction and mitigation, increasing survivability in combat; increase the opportunity for low-altitude interoperability and integration between dissimilar assets; and provide increased flexibility for air-to-ground training to factor in weather conditions.

The DAF considered five alternatives (as discussed on page 3 of this ROD) to configure new low-altitude MOAs in the Moody Airspace Complex proximate to Moody AFB and the Grand Bay Range.

## **BACKGROUND**

The Moody Airspace Complex consists of 11 MOAs; Restricted Areas R-3008A, R-3008B, R-3008C, and R-3008D; and Air Traffic Control Assigned Airspace. The complex supports training for Close Air Support (CAS) and Combat Search and Rescue missions for combat support of United States (US) forces and allies. From 1990 to 2018, the focus of US Air Force training operations was against low-threat enemies, which kept most aircraft training above 10,000 feet above ground level (AGL) to avoid the threat. The National Defense Strategy of 2018, however, refocused the DAF's training to engage near-peer, high-threat enemies. This requires training at low altitudes to avoid the threat envelope of modern surface-to-air missiles. Currently, 67 percent of the total training operations for Moody AFB units occur in low-altitude airspace (less than 8,000 feet mean sea level [MSL]), but low-altitude airspace makes up only 17 percent of the Moody Airspace Complex. For some units, between 85 and 90 percent of their mission training requirements are conducted at altitudes too low to be accommodated by the majority of Special Use Airspace (SUA) in the Moody Airspace Complex. This severely limits these units' abilities to meet their proficiency requirements. To accommodate this, the various units operating at Moody AFB either vie for the opportunity to train in the limited Moody Airspace Complex low-altitude MOAs and Restricted Areas or attempt to schedule low-altitude SUA at other installations in the southeast region where the units based at those locations have mission priority over the Moody AFB training needs.

When active, the Moody Airspace Complex's low-altitude MOAs and Restricted Areas operate constantly with aircraft continually rotating into and out of the SUA to accomplish as much

training as possible in a given day. When unable to operate in the Moody Airspace Complex low-altitude SUA, aircrews conduct modified training maneuvers in the mid-altitude MOAs and Restricted Areas. Although there is cost and effort expended toward this training in the mid-altitude SUA, minimal benefits are realized from these training operations in promoting mission proficiency because modified training at higher altitudes does not adequately simulate real-world combat scenarios. The low-altitude MOAs would address the inadequate Moody AFB-controlled low-altitude airspace available for training missions operating at low altitudes from Moody AFB and optimize the Moody Airspace Complex to enable effective training to achieve real-world combat readiness and survivability. The low-altitude MOAs would more appropriately align with the training missions at Moody AFB.

## **ALTERNATIVES CONSIDERED**

The DAF considered five alternatives (Final EIS, Vol I, Section 2.4, pages 2-12 through 2-39) to support the low-altitude training requirements at Moody AFB. Three of the action alternatives would configure new low-altitude MOAs immediately underneath and within the lateral confines of the existing Corsair North, Corsair South, Mustang, Thud, and Warhawk MOAs and Restricted Area R-3008C, and lower the floor of Moody 2 North MOA in the Moody Airspace Complex. A fourth action alternative, Modified Alternative 1, is a variation of Alternative 1 originally described in the Draft EIS developed in response to input from the FAA and public comments received on the Draft EIS. Modified Alternative 1 would reduce the scale of the Alternative 1 low-altitude airspace configuration based on coordination between the DAF and the FAA during the airspace proposal process. Under Modified Alternative 1, the DAF and FAA would chart new low-altitude MOAs beneath the existing MOAs and Restricted Areas of the Moody Airspace Complex similar to those described by Alternative 1, but with different lateral boundaries.

All four action alternatives would result in the redistribution of aircraft operations from existing low-altitude SUA to new low-altitude MOAs. It is not anticipated that any increases in overall operations would occur due to this redistribution; instead, airspace scheduling conflicts would be eliminated, the timing of training operations would be shifted to more daytime hours, and training requirements at low altitude would be spread over a greater area of airspace instead of being concentrated entirely in Moody 2 North and Moody 2 South MOAs and the Restricted Areas R-3008A, R-3008B, and R-3008C. All four action alternatives would change the times of use for the Corsair North, Corsair South, Moody 2 North, Moody 2 South, Mustang, Thud, and Warhawk MOAs. The times of use for the Corsair North, Corsair South, Hawg North, Hawg South, Mustang, Thud, Sabre, and Warhawk MOAs would change from 0700 to 0200 hours Monday through Friday and all other times by notice to air missions (NOTAM) 6 hours in advance to 0800 to 0100 Monday through Thursday, 0800 to 2200 hours Friday, and all other times by NOTAM 6 hours in advance. The times of use for the Moody 2 South MOA would change from 0600 to 0200 hours Monday through Friday and all other times by NOTAM 6 hours in advance to 0800 to 0100 Monday through Thursday, 0800 to 2200 hours Friday, and all other times by NOTAM 6 hours in advance. The times of use would change for the Moody 2 North MOA from 0600 to 0200 hours Monday through Friday and all other times by NOTAM 6 hours

in advance to 0800 to 0100 Monday through Thursday; 0800 to 2200 hours Friday; closed weekends and holidays; and all other times by NOTAM 6 hours in advance. Under the action alternatives, the times of use for the proposed low-altitude MOAs would be 0800 to 0100 hours Monday through Thursday; 0800 to 2200 hours Friday; closed weekends and holidays; and all other times by NOTAM 6 hours in advance.

**Alternative 1 – Create New Military Operations Areas with a 1,000-Foot Floor, Create a New Grand Bay Military Operations Area, and Lower the Floor of Moody 2 North Military Operations Area** (Final EIS Volume I, Section 2.4.2, page 2-17, Figure 2.4-3)

This alternative would create the Corsair North Low, Corsair South Low, Mustang Low, and Warhawk Low MOAs with a floor of 1,000 feet AGL and a ceiling of 7,999 feet MSL beneath and within the lateral confines of the existing Corsair North, Corsair South, Mustang Low, and Warhawk Low MOAs, respectively; create the Thud Low MOA with a floor of 4,000 feet AGL and a ceiling of 7,999 feet MSL beneath and within the lateral confines of the existing Thud MOA; and create the Grand Bay MOA with a floor of 100 feet AGL and a ceiling of 499 feet AGL beneath and within the lateral confines of the existing Restricted Area R-3008C.

This alternative would lower the floor of Moody 2 North MOA from 500 feet AGL to 100 feet AGL.

This alternative would modify the Banks Lake National Wildlife Refuge (NWR) exclusion zone, which was created by the ROD to the 1986 Winnersville EIS, by lowering the floor of most of the exclusion zone except for the portion over the open water area (an area of approximately 900 acres that includes all open water and adjacent shoreline) of the Banks Lake NWR from 1,500 feet AGL to 500 feet AGL. All other existing operational restrictions (Final EIS, Volume I, Section 1.2.2, page 1-5) would remain unchanged.

Alternative 1 would allow for the redistribution of approximately 31 percent of the existing operations in Moody 2 North and Moody 2 South MOAs into the proposed low-altitude MOAs. Alternative 1 would reduce the utilization within Moody 2 North and South MOAs from 89 percent to 61 percent, which would relieve the congestion within these MOAs.

**Modified Alternative 1 – Create New Military Operations Areas with a 1,000-Foot Floor with Modified Lateral Boundaries, Create a New Grand Bay Military Operations Area, and Lower the Floor of Moody 2 North Military Operations Area** (Final EIS Volume I, Section 2.4.3, page 2-23, Figure 2.4-5)

This alternative would create the Corsair North Low, Corsair South Low, Mustang Low, and Warhawk Low MOAs with a floor of 1,000 feet AGL and a ceiling up to but not including 8,000 feet MSL beneath the existing Corsair North, Corsair South, Mustang Low, and Warhawk Low MOAs, respectively. The Corsair South Low MOA would be within the same lateral confines as the Corsair South MOA; however, the Corsair North Low, Mustang Low, and Warhawk Low MOAs would have reduced lateral confines relative to the overlying Corsair North, Mustang, and Warhawk MOAs. The Warhawk Low and Mustang Low MOAs would always be activated concurrently during training operations. This alternative would create the Grand Bay MOA with

a floor of 100 feet AGL and a ceiling up to but not including 500 feet AGL beneath and within the lateral confines of the existing Restricted Area R-3008C. This alternative would not create the Thud Low MOA.

This alternative would lower the floor of Moody 2 North MOA from 500 feet AGL to 100 feet AGL.

This alternative would modify the Banks Lake NWR exclusion zone, which was created by the ROD to the 1986 Winnersville EIS, by lowering the floor of most of the exclusion zone except for the portion over the open water area (an area of approximately 900 acres that includes all open water and adjacent shoreline) of the Banks Lake NWR from 1,500 feet AGL to 500 feet AGL. All other existing operational restrictions (Final EIS, Volume I, Section 1.2.2, page 1-5) would remain unchanged.

Modified Alternative 1 would allow for the redistribution of approximately 31 percent of the existing operations in Moody 2 North and Moody 2 South MOAs into the proposed low-altitude MOAs. Modified Alternative 1 would reduce the utilization within Moody 2 North and South MOAs from 89 percent to 61 percent, which would relieve the congestion within these MOAs.

**Alternative 2 – Create New Military Operations Areas with a 2,000-Foot Floor, Create a New Grand Bay Military Operations Area, and Lower the Floor of Moody 2 North Military Operations Area** (Final EIS Volume I, Section 2.4.4, page 2-28, Figure 2.4-6)

This alternative would create the Corsair North Low, Corsair South Low, Mustang Low, and Warhawk Low MOAs with a floor of 2,000 feet AGL and a ceiling of 7,999 feet MSL beneath and within the lateral confines of the existing Corsair North, Corsair South, Mustang Low, and Warhawk Low MOAs, respectively; create the Thud Low MOA with a floor of 4,000 feet AGL and a ceiling of 7,999 feet MSL beneath and within the lateral confines of the existing Thud MOA; and create the Grand Bay MOA with a floor of 100 feet AGL and a ceiling of 499 feet AGL beneath and within the lateral confines of the existing Restricted Area R-3008C.

This alternative would lower the floor of Moody 2 North MOA from 500 feet AGL to 100 feet AGL.

This alternative would modify the Banks Lake NWR exclusion zone, which was created by the ROD to the 1986 Winnersville EIS, by lowering the floor of most of the exclusion zone except for the portion over the open water area (an area of approximately 900 acres that includes all open water and adjacent shoreline) of the Banks Lake NWR from 1,500 feet AGL to 500 feet AGL. All other existing operational restrictions (Final EIS, Volume I, Section 1.2.2, page 1-5) would remain unchanged.

Alternative 2 would allow for the redistribution of approximately 16 percent of the existing operations in Moody 2 North and Moody 2 South MOAs into the proposed low-altitude MOAs. Alternative 2 would reduce the utilization within Moody 2 North and South MOAs from 89 percent to 75 percent which would reduce, but not relieve, the congestion within these MOAs.

**Alternative 3 – Create New Military Operations Areas with a 4,000-Foot Floor, Create a New Grand Bay Military Operations Area, and Lower the Floor of Moody 2 North Military Operations Area (Final EIS Volume I, Section 2.4.5, page 2-33, Figure 2.4-7)**

This alternative would create the Corsair North Low, Corsair South Low, Mustang Low, Thud Low, and Warhawk Low MOAs with a floor of 4,000 feet AGL and a ceiling of 7,999 feet MSL beneath and within the lateral confines of the existing Corsair North, Corsair South, Mustang Low, Thud, and Warhawk Low MOAs, respectively; and create the Grand Bay MOA with a floor of 100 feet AGL and a ceiling of 499 feet AGL beneath and within the lateral confines of the existing Restricted Area R-3008C.

This alternative would lower the floor of Moody 2 North MOA from 500 feet AGL to 100 feet AGL.

This alternative would modify the Banks Lake NWR exclusion zone, which was created by the ROD to the 1986 Winnersville EIS, by lowering the floor of most of the exclusion zone except for the portion over the open water area (an area of approximately 900 acres that includes all open water and adjacent shoreline) of the Banks Lake NWR from 1,500 feet AGL to 500 feet AGL. All other existing operational restrictions (Final EIS, Volume I, Section 1.2.2, page 1-5) would remain unchanged.

Alternative 3 would allow for the redistribution of approximately 7 percent of the existing operations in Moody 2 North and Moody 2 South MOAs into the proposed low-altitude MOAs. Alternative 3 would reduce the utilization within Moody 2 North and Moody 2 South MOAs from 89 percent to 83 percent.

**Alternative 4 – No Action Alternative (Final EIS, Volume I, Section 2.4.1, page 2-12, Figure 2.4-2)**

Under the No Action Alternative, the operational floors of the Moody Airspace Complex would remain at 8,000 feet MSL in the Corsair North, Corsair South, Mustang, Thud, and Warhawk MOAs and at 500 feet AGL in Moody 2 North MOA and R-3008C; the exclusion zone over the Banks Lake NWR would remain unaltered.

Under the No Action Alternative, training operations at low altitudes could occur at other airspace complexes in the region. There are other low-altitude SUA in the southeastern US; however, the 23 Wing (WG) is not the scheduling authority of those SUA and therefore cannot guarantee their availability to its squadrons. The added commuting distance would significantly increase aircraft transit time to and from the low-altitude SUA, in some cases by as much as one hour. In using distant SUA to complete required training, the 23 WG would incur higher training costs coupled with reduced aircrew training time as more of the available flight time for training would be used to transit to and from these more distant SUA.

Under the No Action Alternative, the current airspace constraints would continue. The No Action Alternative would not provide for realistic training within SUA associated with Moody AFB.

## ENVIRONMENTALLY PREFERRED ALTERNATIVE

Of the alternatives considered in the Final EIS, the No Action Alternative is identified as the environmentally preferred alternative (Final EIS, Volume I, Section 2.4.1, page 2-12). The No Action Alternative represents a comparatively lower impact on civilian aircraft and airports under the airspace and on the Moody AFB Air Traffic Control (ATC) and Valdosta Radar Approach Control (RAPCON) for deconflicting civilian instrument flight rules (IFR) approaches and departures to underlying airports with military training in the MOAs (Final EIS, Volume I, Section 4.2, page 4-2). The environmental impacts of the No Action Alternative are summarized in Table 2.7-1 of the Final EIS (Final EIS, Volume I, Section 2.7, page 2-42).

## PUBLIC INVOLVEMENT

Public involvement was integral to the DAF's development of the Final EIS. The DAF received and considered many substantive comments, including those received during scoping, at the virtual public hearing, during the public comment period for the Draft EIS, during the FAA's public circularization of the airspace proposal (Final EIS, Volume I, Sections 1.6.2 through 1.6.6, pages 1-15 through 1-20), as well as after the publication of the Final EIS Notice of Availability during the Final EIS 30-day waiting period. The DAF summarized substantive comments received on the Draft EIS and provided responses in the Final EIS (Volume II, Appendix A, Section A-7). The FAA, as a Cooperating Agency on this EIS, submitted to the DAF all comments it received from the circularization of the Moody Comprehensive Airspace Initiative Airspace Proposal and the FAA's summation of consultations on the results of the air traffic aeronautical studies (Final EIS, Volume II, Appendix A, Section A-10).

The DAF provided the following public notices, public review periods, and meetings/hearings during the EIS process:

- *Notice of Intent*: Published on 29 November 2019 in the *Federal Register*, Vol. 84, No. 230, page 65790.
- *Scoping Period*: Initiated on 19 November 2019 and concluded on 6 January 2020. During this time, one public scoping meeting was held in Tifton, Georgia, on 5 December 2019.
- *Draft EIS Notice of Availability*: Published on 25 September 2020 in the *Federal Register*, Vol. 85, No. 187, page 60458.
- *Public Comment and Review Period*: An extended 60-day public comment period was initiated on 25 September 2020 with the publication of the Notice of Availability in the *Federal Register* and concluded on 24 November 2020.
- *Public Hearing*: A virtual public hearing was held on 29 October 2020. The public hearing was held virtually because of the ongoing COVID-19 pandemic and the restrictions associated with public gatherings at the time of the scheduled hearing.
- *Government-to-Government Meetings*: During and following the public comment and review period, two meetings were held with the Georgia Department of Transportation on 9 November 2020 and 4 March 2021 to discuss concerns associated with civil aviation

and public airports, and one meeting was held during the comment period with the Banks Lake NWR to discuss the modification to the Banks Lake NWR exclusion zone.

- *Final EIS Notice of Availability*: Published on 19 May 2023 in the *Federal Register*, Vol. 88, No. 97, page 32215. This initiated the mandatory 30-day waiting period prior to the ROD signature.

## **COMMENTS RECEIVED AFTER THE FINAL EIS**

After publication of the Final EIS on 19 May 2023, and during the 30-day waiting period prior to this ROD being signed, the DAF received one unsolicited submittal from US Environmental Protection Agency Region 4 indicating that they found no significant environmental concerns to be addressed in the Final EIS. No other written comments were received from any other entity during the 30-day waiting period.

## **COORDINATION AND CONSULTATION**

The DAF consulted and coordinated with federal, state, and local agencies and Native American tribes. The DAF considered all substantive public, agency, and Native American tribal comments received during the EIS development. Key consultation and coordination letters are reproduced in the Final EIS, Volume II, Appendix A.

In compliance with Section 106 of the National Historic Preservation Act, the DAF consulted with the Florida and Georgia State Historic Preservation Offices (SHPOs) and with the Alabama Coushatta Tribe of Texas, Alabama-Quassarte Tribal Town, Caddo Nation, The Cherokee Nation, Choctaw Nation of Oklahoma, Coushatta Tribe of Louisiana, Kialegee Tribal Town, Mississippi Band of Choctaw Indians, Muscogee (Creek) Nation, Muscogee Nation of Florida, Poarch Band of Creeks, Seminole Nation of Oklahoma, Seminole Tribe of Florida, Thlopthlocco Tribal Town, and United Keetoowah Band of Cherokee Indians on the potential effects of the Preferred Alternative. The DAF received concurrence from the SHPOs (on 22 July 2020 and 26 October 2020 for the Georgia and Florida SHPOs, respectively) and tribes (Final EIS, Volume II, Appendix F).

In compliance with Section 7 of the Endangered Species Act, the DAF, as the designated Lead Agency, consulted with the US Fish and Wildlife Service (USFWS) on the potential effects of the Preferred Alternative on threatened and endangered species. The DAF received concurrence on 1 June 2020 from the USFWS (Final EIS, Volume II, Appendix E) on the DAF's determination that the Preferred Alternative "may affect, but is not likely to adversely affect" the threatened wood stork (*Mycteria americana*). Since that time, the USFWS determined that the tricolored bat (*Perimyotis subflavus*) and the monarch butterfly (*Danaus plexippus*) warrant listing under the Endangered Species Act; the tricolored bat is proposed for listing as endangered, and the monarch butterfly is an official candidate for listing. Species proposed for listing are not afforded protection under the Endangered Species Act; therefore, the DAF conferenced with the USFWS on the effects of aircraft operations at the Moody AFB airfield, aircraft training operations, and the airspace on these two species. On 24 February 2023 the USFWS provided concurrence with the DAF's determination of "not likely to jeopardize" the continued existence of the tricolored bat and monarch butterfly (Final EIS, Volume II, Appendix



E). As soon as the listing of these species becomes effective, the prohibitions against jeopardizing their continued existence and “take” will apply, and DAF will initiate Section 7 consultation with the USFWS.

## **ENVIRONMENTAL CONSEQUENCES**

All practicable means to mitigate impacts associated with the decision have been adopted. However, some impacts cannot be avoided, and could be perceived as adverse or annoying to affected individuals. Of the estimated total 47,000 annual civilian flights operating in the Moody Airspace Complex, approximately 25,350 annual (69 daily) flights could be affected by the presence of the proposed low-altitude MOAs. This would comprise approximately 10,000 annual (27 daily) VFR flights and approximately 15,400 annual (42 daily) IFR flights. Anticipated beneficial impacts on airspace management would occur in the Moody 2 North and Moody 2 South MOAs as Moody AFB could distribute low-altitude operations across the low-altitude MOAs and decongest the existing high concentration of training that continuously vies for access to the existing low-altitude airspace (i.e., Moody 2 North MOA, Moody 2 South MOA, and the Restricted Areas). Additional air traffic control and coordination would be required to deconflict up to 25,350 civilian flights and military training operations between 1,000 feet and 7,999 feet AGL annually, causing moderate adverse impacts. There would be a reduction in the encroachment of exclusion zones protecting public airport approaches and departure, including those under existing low-altitude SUA such as Homerville Airport (HOE).

There would be a minor impact on recreational soaring activities from low-altitude aircraft operations in the proposed MOAs.

The estimated average day-night sound level (DNL) would range from less than 35.0 A-weighted decibels (dBA) in areas beneath mid-altitude MOAs or areas with limited air operations up to 59.7 dBA in the low-altitude training areas surrounding the Grand Bay Range, which would not change when compared to existing conditions. Areas beneath the Corsair North Low, Corsair South Low, Moody 2 North, Mustang Low, and Warhawk Low MOAs would each experience an increase in sound levels of up to 2.4 dBA DNL and an increase in the percent of highly annoyed persons of up to 0.3 percent (up to 112 persons). Areas beneath the Moody 2 South MOA would experience a decrease in overall sound level of 1.1 dBA DNL and a reduction in the percent of highly annoyed persons of 0.1 percent (equivalent to 7 persons). Areas beneath the Sabre MOA would remain below 35 dBA DNL.

Although the modification of the Banks Lake NWR exclusion zone would increase the individual aircraft overflight noise, only a fraction of the total low-altitude operations over the Banks Lake NWR would occur below 1,500 feet annually, and none of those operations would be below 500 feet AGL. These relatively infrequent, low-altitude aircraft operations over the Banks Lake NWR would not generate noise levels above 65 dBA DNL (i.e., the threshold for incompatible land uses).

No irreversible or irretrievable effects are expected for cultural or natural resources. Impacts on natural resources could occur in the unlikely event of an accident and/or fire. Aircraft movement and noise and the use of defensive countermeasures may affect but are not likely to adversely affect listed wood storks. There would be no effect on listed red-cockaded woodpeckers (*Picoides borealis*), eastern indigo snakes (*Drymarchon couperi*), frosted flatwoods salamander (*Ambystoma cingulatum*), or reticulated flatwoods salamander (*Ambystoma bishop*).

The full environmental consequences analysis for the preferred alternative is presented in the Final EIS, Volume I, Chapter 4.

## **ENVIRONMENTAL PROTECTION MEASURES**

Specific measures to avoid, reduce, or minimize impacts on airspace users, airports, health and safety, and biological resources have been designed into the Preferred Alternative. As such, no significant adverse impacts were identified for any alternatives evaluated. To track operations protocols and management actions to be in place to minimize impacts, within 90 days of the signature of this ROD, the DAF will develop a Letter of Agreement that clearly identifies the specific environmental protection measures and the responsible principal and subordinate organization with responsibility for the oversight and execution for each measure, and the timing for the execution of each measure. In no case will an impact-inducing action be taken or implemented before the applicable protocol or measure described below being funded and put into place. The following are the protocols and environmental protection measures that will be implemented by the DAF:

### Airspace Users, Underlying Communities, and Airports

- Moody AFB, in coordination with Valdosta RAPCON and the Jacksonville Air Route Traffic Control Center (ARTCC), will establish Letters of Agreement with affected public and private airports, as appropriate, to establish ATC procedures for approaches and departures when the low-altitude MOA is active.
- Jacksonville ARTCC can request use of the Thud, Mustang, and Warhawk MOAs to accommodate air traffic through these areas. Additionally, air traffic along V routes (V-5, V-578, and V-579) transiting the Moody Airspace Complex will be prioritized to the maximum extent practical by the Jacksonville ARTCC and Valdosta RAPCON to maintain an unimpeded and safe flow of aircraft between Valdosta and Atlanta.
- IFR flights will be accommodated by the following:
  - For all IFR traffic arriving or departing the underlying airports, Moody AFB ATC is alerted that MOA clearance will be needed approximately 30 minutes prior to an arrival or departure for an IFR civilian aircraft.
  - Upon notification, ATC relocates or pauses military training activity in an active MOA and deactivates the MOA allowing for the IFR civilian aircraft to transit the airspace.

- When the civilian aircraft is clear from the airspace, ATC reactivates the MOA for military training activities following the completion of the IFR civilian flight.
- Most of the airports currently accommodated are not tower controlled, and civilian aircraft depart visual flight rules (VFR) and then call for clearance; at that time ATC clears the MOA of military training activity to provide access for the departing flight, which continues IFR according to its flight plan.
- When Valdosta RAPCON activates or deactivates the MOAs, all surrounding ATC facilities will be notified to alleviate delays for subsequent arriving and transient aircraft. This real-time coordination between agencies is key to managing operations within the Moody Airspace Complex.
- Mid-air collision avoidance brochures will be updated to reflect changes to the Moody Airspace Complex and distributed to airports underlying and proximate to the Moody Airspace Complex.
- For special civilian air operational events, such as the annual Glider Soaring Expo, Lakeland Fun and Sun, annual Sunbelt Agricultural Expo, and the rocketry organizations that sometimes require the use of lower-altitude airspace, Moody AFB ATC and Valdosta RAPCON will develop operational agreements with the users to accommodate their periodic events and avoid conflicts with civilian aircraft operations during these events and military training activities in the proposed low-altitude MOAs.

### Biological Resources

- Use of flares below 2,000 feet increases the risk of fire. If the use of flares is proposed below 2,000 feet in the low-altitude MOAs increasing fire risk, Moody AFB will establish a capability to analyze those fire risks on a site-specific basis.
- Moody AFB will implement a public information program in areas where flares are used over non-Department of Defense land to educate the public about the hazards of dud flares and proper procedures to follow if a dud flare is found.

### **DECISION**

After consideration of relevant operational, environmental, economic, and technical factors discussed in this ROD; environmental consequences explained in the Final EIS; comments and concerns from the public, regulatory and other agencies, and Native American tribes; and other relevant factors, including the need to balance potential avoidance measures, the DAF has decided to select the preferred alternative, Modified Alternative 1, and commits to and adopts the protocols and measures listed above, including those already incorporated into Modified Alternative 1. The DAF will request the FAA take those actions necessary to implement this decision by modifying and establishing the requisite airspace.

I certify that the DAF has considered all the reasonably known alternatives, information, analyses, and comments submitted by State, Tribal, and local governments, and public commenters for consideration by the lead and cooperating agencies in developing this Comprehensive Airspace Initiative EIS for Moody AFB, Georgia.

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ROBERT E. MORIARTY, P.E., SES  
Deputy Assistant Secretary of the Air Force  
(Installations)

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DATE