
PROPOSED FINDING OF NO SIGNIFICANT IMPACT (FONSI)
LAUGHLIN AIR FORCE BASE LOW MILITARY OPERATIONS AREA SPECIAL USE AIRSPACE

The Department of the Air Force (DAF) has prepared the attached Environmental Assessment (EA) to evaluate the potential environmental consequences from the Proposed Action and Alternatives (Proposed Action) to obtain a new permanent low-altitude airspace for the 47th Flying Training Wing (47 FTW) at Laughlin Air Force Base (AFB), Texas to support Fighter Bomber Fundamentals (FBF) pilot training syllabus requirements. The proposed airspace would be managed and scheduled by the 47 FTW.

The attached EA was prepared in accordance with the National Environmental Policy Act (NEPA), as amended by Public Law 30 118-5, Fiscal Responsibility Act of 2023 (42 United States Code 4321 et seq.) and the DoD NEPA Implementing Procedures (June 30, 2025). The Federal Aviation Administration (FAA) is participating as a cooperating agency during the preparation of this EA in accordance with the Memorandum of Understanding between the DoD and the FAA for environmental review of Special Use Airspace (SUA) actions under FAA Order JO 7400.2, *Procedures for Handling Airspace Matters* (the current versions of FAA Orders are referenced in the EA as applicable). The attached EA is incorporated by reference in this proposed Finding of No Significant Impact (FONSI).

Purpose and Need

The purpose of the DAF Proposed Action is to obtain new airspace that affords the 47 FTW autonomous scheduling and ensures nearby access to airspace necessary to perform low-altitude, nonhazardous flight training from 500 feet above ground level (AGL) up to, but not including 7,000 feet mean sea level (MSL), and allows for continuous flight training to Flight Level (FL) 180 or scheduled independently (500 feet AGL up to, but not including 7,000 feet MSL), as needed, to support new multidirectional tactical flying training requirements.

The Proposed Action is needed because pilots do not have regular, prioritized (scheduling / management of airspace) access to multidirectional, low-altitude training down to 500 feet AGL (low altitude/ configuration), with ceilings of up to, but not including 7,000 feet AGL (size), within 10 minutes transit time of Laughlin AFB (minimize transit time).

The FAA's purpose and need for the Proposed Action is to provide the SUA to support the anticipated increased need for military pilot training while minimizing the impacts to the National Airspace System (NAS).

Proposed Action and Alternatives

Under the Proposed Action, the DAF would obtain new low-altitude airspace to support low-altitude pilot training requirements of the FBF syllabus. The proposed low-altitude airspace would need to have a floor of 500 feet AGL and a ceiling of up to, but not including 7,000 feet MSL. Training within the proposed airspace would primarily consist of low-altitude air-to-ground training, which would simulate attacks by training aircraft against simulated ground-based targets. This type of training would occur between 500 feet AGL and 3,000 feet MSL.

Up to 1,570 aircraft operations would occur in the proposed airspace annually (which equates to an average of 4.3 sorties per day) spread out over approximately 976 square miles of airspace. Average sortie time in the proposed Low MOA would be 20 minutes. Aircraft operations in the proposed airspace would primarily be performed by pilots from the 47 FTW at Laughlin AFB

PROPOSED FINDING OF NO SIGNIFICANT IMPACT (FONSI)
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initially flying the T-38C Talon, transitioning to the DAF's newest flying trainer, the T-7A Red Hawk beginning in 2030. Potential effects from the proposed basing of the T-7A at Laughlin AFB were evaluated in the 2024 *Final Environmental Impact Statement and Record of Decision for T-7A Recapitalization at Laughlin Air Force Base, Texas* (2024 T-7A Recapitalization Final EIS and ROD). FBF aircraft operations would be performed Monday through Friday, sunrise to sunset (adjusted seasonally as needed), with other times announced via Notice to Airmen. No nighttime aircraft operations would be proposed in the new airspace.

The DAF initially considered four alternatives for implementing the Proposed Action. Three alternatives were dismissed because they did not meet selection standards used to identify alternatives that would meet the purpose and need. Alternatives retained for detailed analysis in the attached EA are summarized below.

Alternative 1 – Establish New Low-Altitude Military Operations Area Directly Under Laughlin 2 Military Operations Area

Alternative 1 would implement the Proposed Action described above. Under this alternative, the DAF would request FAA to establish a new low-altitude Military Operations Area (MOA) directly under portions of the existing Laughlin 2 MOA. The new airspace would be designated as the Laughlin 2A Low MOA ("proposed MOA"). The proposed MOA would have a floor of 500 feet AGL and a ceiling of up to, but not including 7,000 feet MSL (directly beneath the floor of the existing Laughlin 2 MOA). The proposed MOA would encompass approximately 976 square miles of airspace with the exception of the existing avoidance area around Real County Airport (49R). In accordance with the Letter of Agreement regarding approach control service for airports within the airspace delegated to Laughlin AFB, the 47th Operations Group (OG) would coordinate with the FAA Houston Air Route Traffic Control Center (Houston Center) when the proposed MOA would be active to deconflict military and civilian aircraft operations within an approximately 125-square mile area between 500 feet AGL and 5,000 feet MSL (designated as the "Excluded Area"). This coordination and deconfliction would support ongoing civilian aircraft traffic operating under Instrument Flight Rules (IFR) at Garner Field Airport (UVA) east of Uvalde. No aircraft operations associated with the Proposed Action would occur or be scheduled within the Excluded Area below 6,000 feet MSL.

The proposed MOA would be managed and operated separately from the existing Laughlin 2 MOA and could be combined with that airspace, as needed, to support seamless flight operations from 500 feet AGL to FL180. Training activities would occur in the proposed MOA as described above for the Proposed Action.

Alternative 1 would not involve changes to the lateral boundaries of the existing Laughlin 2 MOA or any other airspace managed by Laughlin AFB. No demolition, construction, or other ground-disturbing activities would occur under Alternative 1. None of the proposed training activities would involve releases of live or inert ammunition or ordnance (including defensive countermeasures such as chaff and flares). Aircraft would not exceed supersonic speeds while operating within the proposed airspace. Alternative 1 would not require changes to the number of personnel or to the number or types of aircraft assigned to Laughlin AFB, or changes to the existing boundaries of that or any other DoD or DAF installation.

PROPOSED FINDING OF NO SIGNIFICANT IMPACT (FONSI)
LAUGHLIN AIR FORCE BASE LOW MILITARY OPERATIONS AREA SPECIAL USE AIRSPACE

No Action Alternative

Under the No Action Alternative, the proposed low-altitude MOA would not be obtained. Low-altitude pilot training requirements of the FBF syllabus would not be met, which would contribute to the degradation of the quality and quantity of pilot training and impede the overall production of future DAF pilots and weapons system officers.

The No Action Alternative provides a baseline for the evaluation of potential impacts from the Proposed Action and also represents a potential and viable decision to not implement the Proposed Action.

Summary of Findings

The summary of findings presented below is based on the detailed analysis provided in the attached EA. Throughout this proposed FONSI and the attached EA, the terms “environmental consequences,” “effects,” and “impacts” are used interchangeably and have the same meaning. Unless otherwise noted, potential effects on resources analyzed in the EA would be the same regardless of the type of aircraft (T-38C or T-7A) that would operate in the proposed airspace. Additional information on potential effects from the proposed basing and operation of T-7As at Laughlin AFB is available in the 2024 T-7A Recapitalization Final EIS and ROD.

Airspace

The Proposed Action would have no significant adverse impacts on airspace. Based on the number of proposed aircraft operations and the number of hourly and daily crossings in the existing and proposed airspace, the proposed MOA would have the size and volume to accommodate additional air traffic associated with Alternative 1. Laughlin Air Traffic Control (ATC) and FAA would review controller workload at the control centers to ensure the safe and efficient handling of any increases in air traffic. As established by FAA letter of agreement with Laughlin AFB and the 47 FTW, Laughlin ATC and FAA control centers would procedurally deconflict air traffic flying under IFR, including both military and civilian IFR operators, by restricting military operations by sector or by altitude band, as needed, to route crossing air traffic through the remaining airspace. Air traffic flying under Visual Flight Rules (VFR) in the proposed MOA would continue to use “see and avoid” flying to prevent conflicts. In compliance with FAA Order 7400.2 Section 25-1-4, Laughlin AFB ATC and pilots would observe a 3-nautical mile (NM) exclusion zone starting at 1,500 feet AGL around Real County (49R) airport to avoid or minimize impacts on local airport operators. Additionally, to support ongoing civilian aircraft traffic operating IFR at Garner Field Airport (UVA) east of Uvalde, the 47 OG would coordinate with FAA Houston Center when the proposed MOA would be active to deconflict military and civilian aircraft operations within an approximately 125-square mile area between 500 feet AGL and 6,000 feet MSL (designated as the Excluded Area). Aircraft operations associated with the proposed MOA would not be scheduled or occur within the Excluded Area below 6,000 feet MSL. As necessary, deconfliction procedures for ongoing aircraft operations in existing Military Training Routes (MTRs) and the proposed MOA would be codified in an approved written agreement with Laughlin AFB authorities to schedule operations safely and effectively.

Noise / Acoustic Environment

The Proposed Action would have no significant adverse impacts from noise. Estimated cumulative noise levels from proposed T-7A operations in the proposed MOA, aircraft operations in the existing Laughlin 1, 2, and 3 MOAs, and estimated noise levels from aircraft operations on MTR

PROPOSED FINDING OF NO SIGNIFICANT IMPACT (FONSI)
LAUGHLIN AIR FORCE BASE LOW MILITARY OPERATIONS AREA SPECIAL USE AIRSPACE

segments that cross the existing and proposed MOAs, would not exceed 49.8 A-weighted decibels day-night average sound level (dBA DNL) (estimated cumulative noise levels involving T-38C operations in the proposed MOA would be lower). This would include noise levels at potential noise-sensitive land uses under or near the proposed MOA. Some noise increases associated with aircraft operations in the proposed MOA would be considered “reportable,” but none would be considered “significant” in accordance with FAA Order 1050.1. Areas under the proposed MOA would remain well below the 65 dBA DNL threshold below which most types of land uses are compatible with aircraft noise. Noise from aircraft operations under Alternative 1 would not be expected to temporarily or permanently impede or prevent the continued occupation of any land use underlying the proposed MOA, existing Laughlin 1, 2, and 3 MOAs, and associated Air Traffic Control Assigned Airspace (ATCAA).

Individual noise events from proposed aircraft operations under Alternative 1 would be heard at various locations on the ground but would be brief and unlikely to cause annoyance or disrupt common activities any more than typical everyday events (e.g., automobile noise, lawn mowing, other civil aircraft flyovers), and would not exceed exposure limits that could result in hearing loss. Any potential interference with speech in indoor settings would also be brief due to the short nature of individual noise events (planes flying at hundreds of miles per hour). Flight paths would typically be distributed throughout the airspace such that the highest overflight noise levels would not be expected to occur repeatedly at a single location on the ground.

Land Use

The Proposed Action would have no significant adverse impacts on land use. Alternative 1 would have no potential to result in development activities or population changes that would require changes to existing or proposed land use patterns or be inconsistent with existing land use plans and policies. Cumulative noise levels from proposed aircraft operations would be similar to existing ambient noise conditions and would not exceed the 65 dBA DNL threshold below which most types of land use are compatible with aircraft noise. Overall, Alternative 1 would have no potential to require temporary or permanent changes to existing or proposed land uses, prevent the continued use and occupation of existing land uses, or result in incompatibilities with existing or planned land uses, plans, and policies.

The Proposed Action could make it more difficult to site new wind farms on the land under the proposed MOA. However, in most cases, the DoD Siting Clearinghouse, through its mitigation response team process, finds a compromise where turbine projects can proceed under MOAs if some or many of the turbines are moved laterally or other types of mitigation strategies are implemented. In addition, much of the airspace within the proposed MOA area is already subject to DoD Siting Clearinghouse review because six existing low-level MTRs cross the airspace. As needed, the DoD would evaluate any utility-scale wind turbine development projects proposed on lands under the proposed MOA and would engage with the developer(s) through the DoD Siting Clearinghouse process to identify mitigation measures to avoid flight obstruction impacts on proposed low-altitude aircraft operations.

Air Quality and Greenhouse Gases

The Proposed Action would have no significant adverse impacts on air quality and greenhouse gases (GHG). Emissions of criteria pollutants regulated by the National Ambient Air Quality Standards (NAAQS) would increase as a result of proposed aircraft operations under Alternative 1, but estimated emission increases for each criteria pollutant would be less than their associated

PROPOSED FINDING OF NO SIGNIFICANT IMPACT (FONSI)
LAUGHLIN AIR FORCE BASE LOW MILITARY OPERATIONS AREA SPECIAL USE AIRSPACE

insignificance indicator values. These estimated net increases in criteria pollutant emissions would not be expected to result in an exceedance of the NAAQS for any criteria pollutant or cause an adverse impact on the attainment status of Air Quality Control Regions associated with counties underlying the proposed MOA. Increases in GHG associated with Alternative 1 would represent approximately 0.00034258 percent of total GHG emissions in the state of Texas and approximately 0.00004582 percent of total U.S. GHG emissions and as such, would not result in significant impacts from GHG at a regional or global scale.

Biological Resources

The Proposed Action would have no significant adverse impacts on biological resources. Alternative 1 would have no effect on vegetation (including invasive species) or habitat because no construction, demolition, or other ground-disturbing activities would occur. It is anticipated that wildlife and domestic animals would generally habituate to noise and visual elements associated with aircraft operating in the proposed MOA. Given the large (976-square mile) area of the proposed airspace, that proposed FBF training operations would be performed during daytime hours only (sunrise to sunset, adjusted seasonally as needed), and the relatively low numbers of sorties proposed (1,570 annually, which would equate to an average of approximately 4.3 sorties per day), the likelihood for birds to encounter aircraft during training operations would remain low. Pilots would follow additional avoidance procedures during low-altitude training if the risk of collisions between aircraft and birds increased. Although the inadvertent injury or death of birds from collisions with aircraft operating in the proposed MOA would represent an adverse impact, such impacts would occur at the individual level and would not permanently impede or prevent the continued foraging, breeding, nesting, or migration of common bird species or wildlife at the community, population, or species level. Any “take” of birds protected by the Migratory Bird Treaty Act would be small on an annual basis and would be considered incidental to military readiness activities in accordance with 50 CFR § 21.42.

In accordance with Section 7 of the Endangered Species Act, the DAF has determined that the Proposed Action may affect, but is not likely to adversely affect the golden-cheeked warbler (*Setophaga chrysoparia*) and would not jeopardize the continued existence of the proposed endangered tricolored bat (*Perimyotis subflavus*) or proposed threatened monarch butterfly (*Danaus Plexippus*). Alternative 1 would have no effect on federally listed plant species, aquatic or semi-aquatic species (fishes, crustaceans, and insects), or federally designated critical habitat in the region of influence because no earth disturbance or activities in or adjacent to surface water bodies would occur. Concurrence with these determinations by the U.S. Fish and Wildlife Service is pending.

Cultural Resources

The Proposed Action would have no significant impacts on cultural resources. Noise levels associated with Alternative 1 would not exceed 49.8 dBA DNL and would remain well below 65 dBA DNL. Any such increases occurring at historic properties listed in the National Register of Historic Places (NRHP) would be brief and relatively infrequent and would be unlikely to affect the integrity or character-defining features of those properties. Alternative 1 would not physically disturb, alter, or otherwise affect NRHP-listed or -eligible architectural or archaeological resources (surface or subsurface) because no construction, demolition, or other ground-disturbing activities would occur. Alternative 1 would have no potential to affect traditional cultural properties or Indian sacred sites because no such properties or sites have been identified in the Area of Potential Effect.

PROPOSED FINDING OF NO SIGNIFICANT IMPACT (FONSI)
LAUGHLIN AIR FORCE BASE LOW MILITARY OPERATIONS AREA SPECIAL USE AIRSPACE

Per guidance set forth in 36 CFR § 800.5, the DAF has determined that the Proposed Action would have no adverse effect on historic properties. In a response dated May 30, 2025, the Texas State Historic Preservation Officer (SHPO) stated that no historic archaeological properties would be affected. SHPO concurrence with the DAF's determination of no adverse effect on historic above-ground resources is pending.

Safety

The Proposed Action would have no significant adverse impacts on safety. Areas under the existing and proposed Laughlin MOAs and associated ATCAA and MTRs are sparsely populated, and the probability of an aircraft mishap over a populated area would be minimized by the limited amount of time an aircraft would be over any specific location. Strict control and use of established safety procedures would minimize the potential for aircraft mishaps and safety risks. General flight safety risks and bird-aircraft strike hazard (BASH) risks would be assessed for flights lower than 1,000 feet AGL, and pilots would follow additional avoidance procedures outlined in the Laughlin AFB BASH Plan during low-altitude training as applicable. All flight operations in the proposed MOA would be conducted in accordance with procedures established in applicable DAF regulations and orders with the safety of its pilots and people in the surrounding communities as the primary concern.

Socioeconomics

The Proposed Action would have no significant adverse impacts on socioeconomics. Alternative 1 would not involve any activities that could result in changes in population, employment, income, or other social or economic activity in areas under the existing and proposed Laughlin MOAs. Increased noise levels from aircraft operating at lower altitudes in the proposed MOA would be comparable to existing conditions and not frequent enough, or loud enough, to permanently impede or prevent the continued occupation or operation of underlying land uses, including those where concentrations of persons under the age of 18 or over 65 years of age could be present. Alternative 1 would not affect the economic activity or output of municipal and regional airfields or notably impede the movement of people and goods because Laughlin AFB ATC and pilots would observe a 3-NM exclusion zone starting at 1,500 feet AGL around Real County (49R) airport in compliance with FAA Order 7400.2 Section 25-1-4. Additionally, Laughlin AFB ATC would implement and adhere to applicable airspace deconfliction procedures in accordance with its FAA-delegated authority and coordinate with FAA Houston Center as needed to ensure the safe operation and transit or avoidance of the proposed airspace by commercial and general aviation aircraft.

Visual Resources

The Proposed Action would have no significant adverse impacts on visual resources. Military training operations in airspace around Laughlin AFB have been a common occurrence for decades. Alternative 1 does not involve construction, demolition, or other earth-disturbing activities and therefore, would not introduce new permanent or temporary buildings, structures, or other constructed, inanimate features or light sources into the existing visual landscape, nor would it change, modify, remove, or otherwise alter existing topography, vegetation, or other naturally occurring features. Therefore, Alternative 1 would have no permanent impacts on visual resources.

Aircraft operating in the proposed airspace at altitudes as low as 500 feet AGL would likely be visible to viewers under or near the proposed MOA, given the relatively clear weather conditions that occur most days in the area; however, these operations would consist of jet aircraft traveling at hundreds of miles per hour and their appearance in the overlying airspace would be brief (likely

PROPOSED FINDING OF NO SIGNIFICANT IMPACT (FONSI)
LAUGHLIN AIR FORCE BASE LOW MILITARY OPERATIONS AREA SPECIAL USE AIRSPACE

less than a few minutes) at any given time as observed from a particular location. Low-altitude aircraft operations in the proposed airspace would also be distributed throughout an approximately 976-square mile area, further minimizing the appearance of aircraft at any particular location under or near the proposed MOA. Aircraft operations in the existing and proposed Laughlin MOAs are already part of the existing visual landscape, and aircraft operations under Alternative 1 would not introduce a new visual element that is not already commonly observed in areas under or near the proposed MOA.

Reasonably Foreseeable Future Actions

When considered with other reasonably foreseeable future actions occurring in and around the proposed Laughlin 2A Low MOA, the Proposed Action would not contribute to significant adverse impacts on resources analyzed in the EA.

Mitigation

No project-specific best management practices or environmental commitments are identified in the EA; however, the use of best management practices is assumed, when applicable, in the discussion of environmental consequences for each resource analyzed in the EA.

Public Involvement

A Notice of Availability for the Draft EA and proposed FONSI was published in the *Eagle Pass News Leader* and *Uvalde Leader News* inviting the public to review and comment on the Draft EA during the 30-day public comment period. The Draft EA and proposed FONSI were made available for public review at local public libraries in Del Rio, Camp Wood, Uvalde, and Leakey, Texas and online at <https://www.laughlin.af.mil/>. Comments on the Draft EA will be considered in the Final EA and FONSI, as applicable.

Finding of No Significant Impact

After review of the attached EA, which was prepared in accordance with the requirements of NEPA, I have determined that the Proposed Action including Alternative 1 to obtain a new permanent low-altitude airspace for the 47 FTW at Laughlin AFB, would not have a significant impact on the quality of the human or natural environment. Accordingly, an Environmental Impact Statement will not be prepared. This decision has been made after considering all submitted information, including review of any public and agency comments received during the 30-day public comment period, and considering a full range of reasonable alternatives that meet project requirements and are within the legal authority of the DAF.

TYLLER J. ELLISON, Col, USAF Commander
47th Flying Training Wing

DATE