

RECORD OF DECISION  
*ENVIRONMENTAL IMPACT STATEMENT*  
*T-7A RECAPITALIZATION AT JBSA-RANDOLPH, TX*

## INTRODUCTION

The Department of the Air Force (DAF) will replace the venerable T-38C aircraft with the new T-7A aircraft at Joint Base San Antonio (JBSA)-Randolph, Texas. The DAF based this decision on the evaluations presented in the *Final Environmental Impact Statement (FEIS) for T-7A Recapitalization at Joint Base San Antonio, Texas*, which is incorporated by reference into this Record of Decision (ROD). The DAF considered the information, analyses, and public comments received and contained in the FEIS, along with other relevant matters.

This ROD is issued per the Council on Environmental Quality (CEQ) regulations that implement 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> The DAF is the lead agency for this EIS. The DAF considered all of the alternatives, information, and analyses, and objections submitted by States, Tribal, and local governments and other public commenters for consideration by the DAF in developing the FEIS.

This ROD documents:

- The decision;
- The alternatives considered;
- The environmentally preferable alternative;
- Relevant factors and how those factors entered into the decision;
- Whether all practicable means to avoid or minimize environmental harm from the selected alternative have been adopted, and if not, why not; and
- Mitigations.

## DECISION SYNOPSIS

The T-7A recapitalization will include construction, demolition, and renovation of various facilities on JBSA-Randolph (*FEIS, Vol 1, Section 2.1.4.1, Pg. 2-8, Figure 2-1*). T-7A aircraft operating out of JBSA-Randolph will utilize the Seguin Auxiliary Airfield (AAF), JBSA-Lackland (Kelly Field), and existing designated airspace for training (*FEIS, Vol 1, Section 1.4.1, Pg. 1-6, Figure 1-5*). Additionally, the T-7A mission at JBSA-Randolph will increase the on-base workforce by approximately 303 personnel with a corresponding increase of 576 dependents (*FEIS, Vol 1, Section 2.1.3*).

## BACKGROUND

The EIS was prepared to support the Secretary of the Air Force strategic basing proposal to initiate recapitalization efforts at existing T-38C training installations with JBSA-Randolph as the initial site to support Pilot Instructor Training (PIT) and Introduction to Fighter Fundamentals (IFF). In the FEIS, the DAF evaluated the proposed recapitalization action at JBSA, assessing the T-7A aircraft operations, associated facilities, and the increase in personnel. The FEIS analyzed the Proposed Action, three action alternatives, and the No Action alternative.

As discussed later in this ROD, the DAF has not had the opportunity to fly the T-7A in the San Antonio region or in a mode reflecting its anticipated normal flight training operations. For EIS

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<sup>1</sup> Note: The environmental analysis was underway prior to the September 14, 2020, effective date of the CEQ's final rule updating its regulations for implementing the procedural provisions of NEPA. Accordingly, the DAF adhered to the regulations in place when EIS development began, pursuant to 40 CFR 1506.13.

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Noise and Air Quality modeling, T-38C aircraft flight parameters and power settings, along with preliminary T-7A test results were utilized for NOISEMAP and Air Conformity Applicability Model (ACAM) modeling operations at JBSA-Randolph, Seguin AAF, and throughout the special use airspace (*FEIS, Vol. 1 Section 3, Pg 3-5*).

The FEIS considered the number of projected aircraft operations to analyze both the air quality and noise impacts from aircraft operational parameters, which include power settings, patterns, altitudes, takeoffs, landings, and closed patterns (e.g. “touch-and-go’s”). Once training operations begin, DAF will better understand and define actual T-7A flight profiles, and apply standard analysis methodologies in order to forecast noise and air impacts. Using actual data allows realistic operational and engine data to produce a more refined projection of impacts. The new data will be analyzed to understand the potential effects of activities or practices that are underway (or being considered) for implementation in T-7A airfield and related airspace operations up to final operational capability, and thereafter.

The action will occur primarily within Bexar County, which was designated as a marginal nonattainment area for the 2015 8-hour Ozone National Ambient Air Quality Standards (NAAQS) in 2018; therefore, the impact on air quality is potentially a limiting factor for T-7A operations at JBSA. Because of Bexar County’s designation as a marginal ozone nonattainment area, the portion of the action within Bexar County is subject to the requirements of the General Conformity Rule (GCR, 40 CFR 93 Subpart B). For marginal nonattainment areas, the GCR established annual net change in emissions *de minimis* values (insignificance threshold) of less than 100 tons per year (tpy) for both nitrogen oxides (NOx) and volatile organic compounds (VOCs), *i.e.* ozone precursors.

DAF’s end state intent is to allow for operation of 72 T-7A aircraft to their fullest capability to effectively and efficiently train future DAF fighter and bomber pilots the fundamental and transferable skill sets required to conduct assigned peacetime and combat missions.

Primary flight operations will occur at JBSA-Randolph. Secondary flight operations will occur at JBSA-Lackland (Kelly Field) and Seguin AAF; and within the airspace of all Special Use Airspace (SUA), ranges, alternative airfields, and Military Training Routes (MTRs) that are currently used by the T-38C aircraft. Any required noise abatement measures will be published in applicable guidance.

### **ALTERNATIVES CONSIDERED**

As more fully described in the FEIS (*Vol. 1, Sections 2.1 and 2.2*), the DAF identified the Proposed Action as its Preferred Alternative, three action alternatives, and a no action alternative for aircraft numbers and aircraft operations at JBSA-Randolph. The FEIS (*Vol. 1, Sections 2.1 and 2.2*) also describes the common elements that the action alternatives share, including personnel, construction and renovation projects, and airspace and range utilization. As noted in each of the alternatives discussed below, a mitigated version was created based on mitigations intended to reduce the significance of impacts associated with the original alternatives.

**Proposed Action.** JBSA-Randolph would receive 72 T-7A aircraft incrementally during the period from about 2023 through 2028, and incrementally reduce T-38C Talon aircraft currently operating from JBSA-Randolph from 91 to zero from 2024 through 2031. Primary flight operations would occur at JBSA-Randolph; secondary flight operations would occur at JBSA-Lackland (Kelly Field) and Seguin AAF. No changes to established Special Use Airspace configurations (*i.e.*, size, shape,

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or location) are required to support the operations of the T-7A aircraft. Mission enhancements as part of recapitalization would increase the number of personnel on JBSA-Randolph by approximately 300. Concurrently, six military construction projects and 13 facilities sustainment, restoration, and modernization projects would occur at JBSA-Randolph to provide modern facilities and infrastructure to support the T-7A aircraft's maintenance, training, and operational requirements. (*FEIS, Vol. 1, Section 2.1*)

The number of training operations would vary over the implementation period and would continue to include daytime training operations and introduce up to 5,952 annual nighttime training operations. The nighttime operations would occur at JBSA-Randolph (5,664 per year) and JBSA-Lackland (Kelly Field) (288 per year); Seguin AAF does not have the capabilities to support nighttime operations.

The Mitigated Proposed Action (*FEIS, Vol. 1, Section 3.1.4.3.1 and Section 3.2.4.3.1*) was developed to reduce the aircraft noise impacts associated with the Proposed Action. DAF determined that operation of the T-7A aircraft during certain segments of flight patterns and the reduced use of afterburner from 100 percent to 5 percent of takeoffs is feasible and would dramatically reduce the noise impacts due to aircraft operations. The number of flight operations and all other parts of the Proposed Action would remain the same.

The Proposed Action and the Mitigated Proposed Action were also evaluated for air quality GCR compliance. Both would exceed the GCR emissions *de minimis* value for NO<sub>x</sub> in 2027; therefore, a formal GCR Determination with potential mitigation efforts is required before the Proposed Action or Mitigated Proposed Action could proceed at flight operation levels beyond 2026. Both the Proposed Action and the Mitigated Proposed Action meet the GCR *de minimis* criteria if constrained below the 100 tpy GCR *de minimis* value for NO<sub>x</sub> (i.e., constrain to 2025 net change emission levels) for the reasonably foreseeable future. However, to operate beyond the GCR *de minimis* constraints and into the out years (beyond 2026) and projected full-strength level (as depicted in the Mitigated Proposed Action's out years), a reevaluation of GCR compliance would be required (40 CFR 93.157) based on Bexar County's attainment status at that time (reference "Reevaluation of GRC Compliance" below for detail).

The implementation of GCR *de minimis* constraints would also require recordkeeping and annual reporting to the state to demonstrate and document that flight operations did not exceed the *de minimis* values for the calendar year.

***Alternative 1: Conduct T-7A Operations at a Lower Intensity than the Proposed Action with Fewer Aircraft to Comply with Clean Air Act (CAA) General Conformity Requirements.***

Alternative 1 entails limiting the Proposed Action's T-7A flight operations to keep the annual net change in emissions below the 100 tpy GCR *de minimis* values for NO<sub>x</sub>. JBSA-Randolph would receive up to 56 T-7A aircraft, with all aircraft arriving no later than 2028. T-7A operations would reach the current maximum allowable number of operations in 2028 based on projected net change in emissions and the GCR *de minimis* value for NO<sub>x</sub> (an ozone precursor). T-38C operations would conclude in 2027. In addition to the proposed daytime flight operations, up to 4,065 annual nighttime T-7A operations would be performed at JBSA-Randolph and up to 225 annual nighttime T-7A operations would be performed at JBSA-Lackland (Kelly Field). The conversion from T-38C to T-7A aircraft and the annual aircraft operations for JBSA-Randolph, JBSA-Lackland (Kelly Field), and Seguin AAF under Alternative 1 are defined in Table 2.5 (*FEIS, Vol. 1 Section 2.2.1.2*). This alternative allows the action to be implemented without exceeding prescribed *de minimis*

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value (indicator) in the Bexar County non-attainment area.

Mitigated Alternative 1 (*FEIS, Vol. 1, Sections 3.1.4.3.2 and 3.2.4.3.2*) was created because the reduction in power settings and afterburner resulted in an increase in the net change in NO<sub>x</sub> emissions and exceeded the *de minimis* indicator of 100 tpy. In order to maintain the intent of Alternative 1 to remain below the *de minimis* indicator, the number of aircraft operations was reduced by 3.5 percent from those originally presented for Alternative 1. This reduction in operations would allow for the net change in NO<sub>x</sub> emissions to remain below the *de minimis* indicator.

The implementation of Alternative 1 or Mitigated Alternative 1 would also require recordkeeping and annual reporting to the state to demonstrate and document flight operations did not exceed the *de minimis* values for the calendar year.

Should the future training missions require additional flight operations, a reevaluation of compliance with the GCR would be required based on Bexar County's attainment status at that time.

***Alternative 2: Perform T-7A Operations at an Intensity 15 Percent Greater than the Proposed Action.*** Like the Proposed Action, JBSA-Randolph would receive 72 T-7A aircraft, with all aircraft arriving no later than 2028; T-7A operations would reach full capacity in 2032; and T-38C operations would conclude in 2031. However, under Alternative 2, beginning in 2024, T-7A aircraft would perform annual operations at JBSA-Randolph, JBSA-Lackland (Kelly Field), and Seguin AAF at an intensity that is approximately 15 percent greater than the Proposed Action.

Alternative 2 is intended to cover a potential scenario in which, for either broad strategic or tactical operational reasons, DAF requires a surge or increase in pilot training operations above the program implementing plan and is represented by the 15 percent increase. T-7A nighttime operations would occur with up to 6,569 nighttime operations at JBSA-Randolph and up to 331 nighttime operations at JBSA-Lackland (Kelly Field). The conversion from T-38C to T-7A aircraft and the annual aircraft operations for JBSA-Randolph, JBSA-Lackland (Kelly Field), and Seguin AAF under Alternative 2 are defined in Table 2.6 of the Final EIS (*FEIS, Vol. 1, Section 2.2.1.2*).

Mitigated Alternative 2 (*FEIS, Vol. 1, Section 3.1.4.3.3*) was developed as part of the effort to reduce power settings and afterburner and, like the other alternatives, resulted in a higher emission rate of nitrogen oxides above the *de minimis* indicator. The other elements of Alternative 2 remain the same.

Alternative 2 was evaluated for air quality GCR compliance. The net change in emissions would exceed the GCR emissions *de minimis* value for NO<sub>x</sub>; therefore, a formal GCR Determination with potential mitigation efforts would be required before this alternative or its mitigated alternative could proceed. As a consequence, Alternative 2 cannot be approved at this time.

***Alternative 3: Perform T-7A Operations at an Intensity 25 Percent Greater than the Proposed Action.*** Like the Proposed Action, JBSA-Randolph would receive 72 T-7A aircraft with all aircraft arriving no later than 2028; T-7A operations would reach full capacity in 2032; and T-38C operations would conclude in 2031. However, Alternative 3 would further increase the surge or increase of T-7A operations to approximately 25 percent above the Proposed Action beginning in 2024. T-7A nighttime operations would occur with up to 7,140 nighttime operations at JBSA-Randolph and 360 nighttime operations at JBSA-Lackland (Kelly Field). The conversion from T-38C to T-7A aircraft and the annual aircraft operations for JBSA-Randolph, JBSA-

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Lackland (Kelly Field), and Seguin AAF under Alternative 3 are defined in Table 2-7 (*FEIS, Vol. 1, Section 2.2.1.2*)

Mitigated Alternative 3 (*FEIS, Vol 1, Section 3.1.4.3.4*), similarly to the Proposed Action and Mitigated Proposed Action, applies the same reduction in power settings and afterburner to the Alternative 3 level of T-7A aircraft operations. The other elements of Alternative 3 remain the same.

Alternative 3 was evaluated for air quality GCR compliance. The net change in emissions would exceed the GCR emissions *de minimis* value for NO<sub>x</sub>; therefore, a formal GCR Determination with potential mitigation efforts would be required before this alternative or its mitigated alternative could proceed. As a consequence, Alternative 3 cannot be approved at this time.

**No Action Alternative:** The *FEIS* also evaluated a No Action Alternative (*FEIS, Vol. 1, Section 2.3*). With the No Action Alternative, DAF would not implement T-7A recapitalization at JBSA. As a result, DAF's T-7A recapitalization program would not be initiated at JBSA and T-7A aircraft would not be flown for pilot training in place of the T-38C at JBSA. The installation's existing fleet of T-38C aircraft would continue to be used in their current capacity even though they will reach the end of their service lives within the next decade. The affected environment (*FEIS, Vol. 1, Section 3*) for each resource area would remain the same under the No Action Alternative.

### **ENVIRONMENTALLY PREFERRED ALTERNATIVE**

Of the alternatives considered, the environmentally preferred alternative is the No Action Alternative because taking no action would result in the lowest number of acres and people exposed to noise impacts and the least amount of air emissions from aircraft operations. Additionally, there would be no impacts to environmental resources from construction, such as soil and water resources.

### **BASIS OF DECISION**

The basis of this ROD is the Secretary of the Air Force's strategic basing decision to recapitalize the Air Education and Training Command (AETC) T-38C aircraft fleet with the new T-7A aircraft at existing T-38C training installations and to incrementally deliver T-7A aircraft during the period from about 2023 through 2028. Concurrently, T-38C Talon aircraft will be incrementally reduced from 91 to zero from 2024 through 2031. To implement the replacement of T-38C aircraft with T-7A aircraft at JBSA-Randolph, the DAF has selected the Mitigated Proposed Action, which incorporates reduced use of power settings and afterburner to mitigate aircraft noise impacts and air pollution emissions.

As required by the National Defense Authorization Act (NDAA) for Fiscal Year 2021, DAF also considered military family readiness factors. As applicable to the subject basing action, Section 2883 of the NDAA requires the Secretary of the Air Force in determining whether to proceed with the action to take into account, among other factors as the Secretary considers appropriate, the following three military family readiness considerations: housing, health care, and interstate portability of licensure and certification credentials. By authority delegated from the Secretary of the Air Force by memorandum dated June 19, 2022, this ROD documents that the Deputy Assistant Secretary (Installations) considered the following:

- **Housing.** As documented in the *FEIS (FEIS, Vol. 1, Page 3-5)*, the DAF considered the extent to which DAF and private sector housing resources are available. The DAF will

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continue to analyze and plan for the long term regarding the adequate mix of such housing to adequately support the expected population.

- **Health Care.** The DAF determined that health care resources will be adequate to support the expected population and is conducting analysis and planning to ensure sufficient medical care from DAF and private sector resources are available.
- **Interstate Portability of Licensure and Certification Credentials.** Using the Support of Military Families analytic framework, the results of which are publicly available at <https://www.af.mil/> in the State Licensure Portability section under the About Us tab, the DAF determined that Texas statutes are moderately supportive to licensure and certification portability.

## MITIGATIONS

Mitigations have been identified and those to be carried forward and implemented by the proponent are reflected below. The FEIS (*Vol. 1, Section 3*) includes and analyzes mitigations for impacts identified or required by regulation or DAF guidance for each affected resource. The FEIS, Table 2-10, summarizes the mitigation measures. Currently, the DAF has adopted all practicable means to avoid or minimize environmental harm from the alternative selected, pending future delivery of the new T-7A aircraft. Notwithstanding the mitigations prescribed in this ROD, the DAF has a continuing duty to review the FEIS and consider new information relevant to environmental impacts.

Delivery of the T-7A will take place incrementally with a concurrent increase in T-7A operations, which will provide the proponent time to collect the necessary data, re-run ACAM and NOISEMAP, more accurately define the potential impacts, and implement as needed, any revised flight operations and course rules to mitigate impacts through an Adaptive Management (AM) process as outlined in the FEIS (*Vol. 2, Appendix D*). DAF's AM will be a proactive mitigation oversight program to understand complex, interrelated systems through a long-term process, built around a continuous cycle of experimentation, evaluation, learning, and improving over time. The ability to experiment and test hypotheses in a time frame that allows meaningful data to be gathered and evaluated is an important element of that process. AM will take place within the bounds of the impacts and mitigations assessed in the FEIS.

Once DAF begins to receive T-7A aircraft, and upon initiation of T-7A flight operations at JBSA-Randolph, better defined operational parameters will be established and information tracking and reporting will begin. The proponent will implement the mitigations listed below by resource area.

The AETC proponent (32 CFR § 989.3(d)) will develop a Mitigation Plan within 90 days of the signature of this ROD that identifies principal and subordinate organizations with responsibility for oversight and execution of specific mitigations identified in this ROD in a measurable fashion. The proponent will not implement an impact-inducing action related to the T-7A recapitalization before the applicable mitigation measures described in this ROD are funded and put in place.

The Mitigation Plan will include, but not be limited to:

- Specifying measurable mitigations
- Identification of monitoring type & how monitoring will be executed for each mitigation
- Sequencing of in-process reviews
- Delineating organization(s) responsible for funding & mitigation implementation

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- Timing (start through finish) of each mitigation
- Establishing the process for identifying and making changes to the action or mitigations to influence beneficial results or avoid/reduce adverse results and
- Adaptive Management

***Noise, Air Quality & Biological Resources:***

The proponent will start recordkeeping and reporting requirements at the beginning of T-7A operations, to demonstrate and document flight operations do not exceed the *de minimis* values for the calendar year and operations are conducted in such a manner as to conform with the requirements of CAA § 176(c) and 40 CFR Part 93. Recordkeeping will be monthly tracking of both T-7A and T-38C flight operations within Bexar County, and includes recording the number of aircraft, takeoff and landing cycles, closed patterns, trim tests, and test cell runs. Annual reporting on 1 Apr of each calendar year will include the net annual NOx emissions associated with both T-7A and T-38C flight operations and any Early Emissions Reduction Credits (ERCs) usage. Early ERCs are local emission reduction credits that are earned, owned, and to be used only by the originating Federal facility (e.g., JBSA) which can be used as emission credits for future General Conformity evaluations.

Both monthly and annual reports must be filed with 802 CES/CEIE and AFCEC/CZTQ to ensure that emissions from operations remain below *de minimis*. Any net annual NOx emissions exceeding the 100 tpy *de minimis* value must be reported to the Texas Commission on Environmental Quality (TCEQ), and require ceasing of T-7A/T-38 operations until such time as the values are below *de minimis*. All annual reporting must be available to TCEQ and the general public upon request. Recordkeeping and reporting requirements will be terminated upon Bexar County achieving attainment status for the 2018 Ozone NAAQS, or if authorized by a future ROD. Specific Noise, Air Quality, and Biological Resources mitigations are as follows:

*Noise:*

- Limiting afterburner usage up to 5% of all takeoffs and ensure pilots record afterburner use for tracking, monitoring, and reporting biannually
- Avoiding low level flights over Sunday morning religious services (Saturday morning for religious facilities that primarily have services on those days) over several churches (FEIS, Vol 1, and Section 3.2.4.3.1, Table 3-55)

*Air Quality:*

- The proponent will limit the total number of operations to remain below the 100 tpy GCR NOx *de minimis* value
- The proponent will perform additional GCR Applicability Analyses, and if necessary, a GCR Determination, to ensure compliance with CAA § 176(c) and 40 CFR Part 93 Subpart B if any increases in operations are proposed for execution

*Biological Resources*

- The proponent will ensure nesting surveys are accomplished prior to construction. Activities occur during the Migratory Bird Treaty Act nesting season (March 15 - September 15), a qualified biologist conduct nesting surveys no more than five days prior to the scheduled clearing. If active nests are observed, a 150-foot buffer of

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vegetation will be left intact until the young have fledged or the nest is abandoned

**REEVALUATION OF GCR COMPLIANCE AND NOISE FOOTPRINT**

The proponent will re-evaluate Noise and Air Quality impacts by updating the existing NOISEMAP and ACAM models with actual operational T-7A flight parameters no later than 18 months after T-7A First Aircraft Arrival and annually thereafter until an accurate understanding of modeling inputs is achieved. Noise and Air Quality analysis will use the same engine and flight data. Additional data sources may include interviews with aircrews, planners, schedulers and air traffic controllers to re-evaluate the frequency and conduct (power settings, altitudes, time-in-mode, etc.) of departures, arrivals, and closed pattern operations. Data will be compiled and integrated in order to update the noise and air quality models. The goal is to inform more accurate data input to the NOISEMAP and ACAM models as T-7A operations stabilize. The proponent will continue to determine the safest, most efficient, and least-intrusive flight operations for T-7A training.

JBSA will continue to implement an Energy Savings Performance Contract (ESPC) involving emission reductions and continue to pursue NOx Early ERCs that, if granted by the TCEQ, could be applied to a revised GCR Applicability Analysis or future GCR Determination. Use of the ESPC credits for additional operations is not authorized unless approved by TCEQ in accordance with the Early ERC program agreement signed by TCEQ on 17 February 2022 and the 502 ABW/CC on 19 March 2022.

- JBSA reserves the option to bank any Early ERCs for future operations under this action or unrelated actions
- The proponent will perform additional General Conformity Applicability Analyses, and, if necessary, a General Conformity Determination to ensure compliance with CAA § 176(c) and 40 CFR Part 93 Subpart B if sufficient Early ERCs are granted

**DECISION**

After considering the potential environmental impacts of the Alternatives including the Proposed Action, comments and concerns of the public and other key stakeholders, as well as other factors related to national defense, including current military operational needs and costs, the DAF will, by this decision, replace all T-38C aircraft at JBSA-Randolph with up to 72 T-7A aircraft and continue flying training programs at JBSA-Randolph.

The incremental delivery of T-7A aircraft and replacement of T-38C aircraft will conform to a mitigation plan that incorporates a well-defined adaptive management process, mitigation tracking and reporting, and other related issues as described in the FEIS and above discussions. The proponent will execute all other portions of the Proposed Action alternative associated with facility construction and personnel increases as defined in the FEIS. All actions identified for execution are consistent with the General Conformity Applicability Analysis that is made by the execution of this ROD.

The ultimate number of projected aircraft operations are defined in Table 2-1 (*FEIS, Vol. 1, Section 2.1.1*) but will occur with reduced power settings and reduced afterburner usage as defined for the Mitigated Proposed Action. Should the future training mission require additional flight operations, a reevaluation of local noise impacts and compliance with the GCR would be required (40 CFR 93.157) based on Bexar County's attainment status at that time and prior to taking any action.

Any activities and actions that are required to support the additional aircraft operations beyond the



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GCR NOx *de minimis* value will be subject to additional General Conformity and NEPA analysis as required when appropriate and as necessary, prior to taking any action.

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ROBERT E. MORIARTY, P.E., SES

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Date

Deputy Assistant Secretary of the Air Force (Installations)