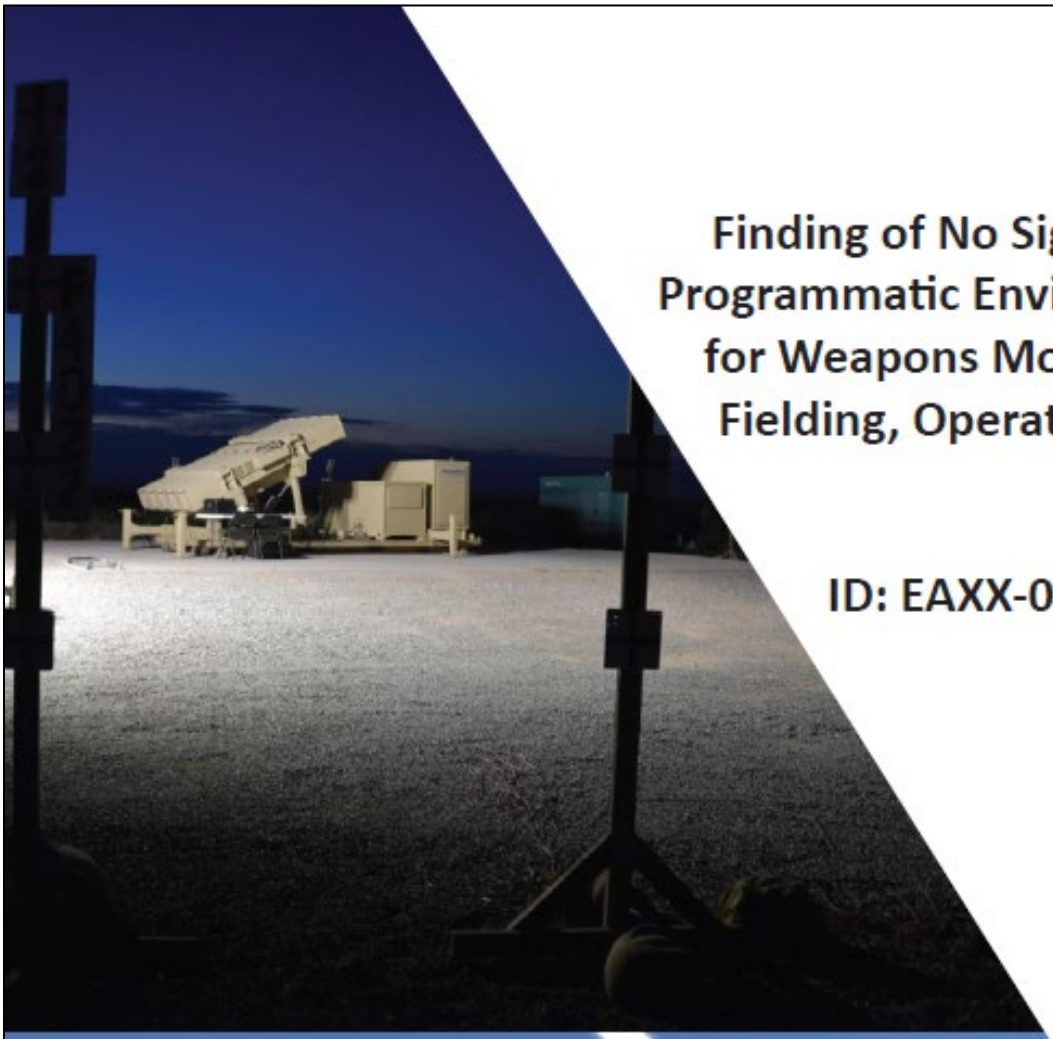

# Finding of No Significant Impact for the Programmatic Environmental Assessment for Weapons Modernization Stationing, Fielding, Operations, and Maintenance Fort Sill, Oklahoma

**ID: EAXX-007-21-001-1737986499**

**Final**

**September 2025**

**Prepared by:**
**Chloeta and Scout**

Cover Images:

Top photo: An Indirect Fire Protection Capability (IFPC) at night. Photo Credit, Heriberto Ibarra WSMR.

Bottom photo: A High-Power-Directed Energy (HP-DE) Palletized Load System based IFPC High Energy Laser (IFPC-HEL) in a desert landscape. Photo credit, U.S. Army.

## INTRODUCTION

The National Environmental Policy Act of 1969 (NEPA) (42 United States [U.S.] Code Section 4321 *et seq*.) requires federal agencies to consider potential environmental impacts prior to undertaking a course of action.

In accordance with NEPA, Department of Defense National Environmental Policy Act Implementing Procedures, 30 June 2025 and Army Regulation 200-1, the Army has prepared this Programmatic Environmental Assessment (PEA).

This PEA is titled “Programmatic Environmental Assessment for Weapons Modernization, Stationing, Fielding, Operations, and Maintenance Fort Sill, Oklahoma.” This PEA is incorporated by reference in this Finding of No Significant Impact (FONSI), and has been developed to analyze the potential environmental consequences that could result from implementation of stationing and fielding, up to five weapons systems at Fort Sill. These weapons systems include the Dark Eagle, Mid-Range Capability (MRC) System, Indirect Fire Protection Capability (IFPC), High-Power – Directed Energy (HP-DE) Systems, and the Lower Tier Air and Missile Defense Sensor (LTAMDS).

Fielding these systems would enhance the Army’s capability to defeat advanced and future threats, providing new capabilities to soldiers, and integrate with new and existing systems. The intent of fielding and stationing these weapons systems is to create a modernized Army capable of conducting multi-domain operations as part of an integrated Joint Force that is ready to conduct multi-domain operations across an array of scenarios in multiple theaters by 2035.

This PEA provides a broad and programmatic analysis to determine potential impacts on the environmental and socioeconomic areas of concern. Decisions on which weapons systems to station at Fort Sill will be made by Army decision makers based on the information in this PEA/FONSI as well as other mission-related considerations.

## PROPOSED ACTION

The Army’s proposed action is the fielding and stationing, operations, and maintenance of up to five weapons systems at Fort Sill. These systems are an essential step in the realization of the Army Modernization Strategy (AMS) outline for transforming the Army into a multi-domain force by 2035.

## PROPOSED ACTION ALTERNATIVES

The PEA evaluated two action alternatives and the no action alternative. The alternatives considered and analyzed in the PEA were:

### No Action Alternative

The no action alternative refers to the continuation of existing conditions without implementation of the proposed action. Implementation of the no action alternative would mean that none of the proposed weapons systems would be fielded or stationed at Fort Sill. Under the no action alternative, the Army would not enhance its structural Multi-Domain Operations capabilities. Although implementation of the no action alternative would not meet the purpose and need, or

the objectives of the AMS, the no action alternative serves as the baseline for the comparison of potential impacts to all resource areas.

### Alternative 1

Alternative 1 includes the fielding and stationing of the IFPC and the HP-DE weapons systems along with their respective equipment and associated soldiers to Fort Sill. Alternative 1 meets all six of the screening criteria described in Section 2.2.

The fielding and stationing of the IFPC and HP-DE weapons systems involves the support of approximately 735 soldiers. An estimated 1,304 family members, including spouses and children, might accompany the soldiers. This could result in an overall increase of 2,039 to the Fort Sill population.

### Alternative 2

Alternative 2 includes the fielding and stationing of the Dark Eagle, MRC, IFPC, HP-DE, and LTAMDS weapons systems along with their respective equipment and associated soldiers to Fort Sill. Alternative 2 meets all six of the screening criteria described in Section 2.2.

The fielding and stationing of the Dark Eagle, MRC, IFPC, HP-DE, and LTAMDS weapons systems would require the support of approximately 865 to 925 soldiers. Using the upper limit of anticipated soldiers, an estimated 1,249 family members, including spouses and children, might accompany the soldiers. This could result in an overall increase of 2,174 people to the Fort Sill population.

## SUMMARY OF ENVIRONMENTAL EFFECTS

Each resource area was analyzed for potential impacts from the proposed action, including any reasonably foreseeable effects. Potential impacts that could result from the implementation of the action can be both beneficial and adverse. The degree of environmental beneficial and adverse impacts is characterized as none, negligible, minor, moderate/less than significant, significant but mitigable, and significant.

> *Clarification of Impact Terminology*
> The Army acknowledges that the definition of “adverse” impacts provided in Section 3.1 of the PEA, specifically, “the impact of implementing the action would not benefit the resource/issue,” may be interpreted as limited to neutral effects and does not explicitly convey the potential for detrimental or negative effects to resources. Adverse impacts should be understood to encompass the full range of negative, detrimental, or harmful effects to a resource, including but not limited to degradation, loss of function, or other undesirable environmental outcomes. The analysis in the PEA considered these types of detrimental effects in its impact determinations, so the conclusions of the analysis remain valid with this clarified definition.

Impacts are anticipated to be minimized through avoidance, and the implementation of existing environmental protection measures. Avoidance strategies depend on the alternative selected, and where construction activities are planned. Examples of environmental protection measures would include implementing erosion and stormwater control measures; maintaining vehicles and equipment; and sustaining vegetation cover at the construction sites. The Army will continue to adhere to legal and regulatory requirements, and continue to implement its approved management plans, Standard Operating Procedures (SOPs), and Best Management Practices (BMPs).

Implementation of the selected alternative may require additional site-specific analyses, including follow-on NEPA evaluations, to address actions necessary for fielding, stationing, siting considerations, and other environmental issues. With the implementation of the identified BMPs outlined below and further evaluation of site-specific design plans, no significant impacts are anticipated from any of the proposed action alternatives assessed in this PEA.

The analysis in this PEA determined that BMPs may be implemented should future supporting construction and operation analysis activities be determined significant. Future anticipated operational impacts and associated BMP incorporation as follows will ensure impacts remain less than significant. These impacts and subsequent BMPs are detailed by resource area as described below.

- **Air Quality – Less than Significant**
    - *Impacts*: Alternative 1 would result in a slight increase in fuel use, air emissions, and traffic due to the fielding of new weapons systems and additional personnel., but emissions would not exceed air quality standards. Alternative 2 would have similar impacts as alternative 1, with slight increases in fuel use, air emissions, and traffic from the new weapons systems and personnel influx. These emissions would not be enough to cause a violation of an ambient air quality standard, nor would sensitive populations be impacted by training activities, so there would be no significantly adverse impacts. There is not enough information at this time to identify the exact level of increase if construction is required, but this determination could be made once the requirements are more fully known. At that point, supplemental NEPA analysis might be appropriate.
    - *Best Management Practice(s)*: For all alternatives, fugitive dust generation from weapon system maneuvers is expected and dust control measures may need to be implemented. If additional infrastructure is needed to support the weapons systems, construction may require permitting, and new stationary sources may need to be reviewed and included in the installation's air permit. Supplemental NEPA analysis may be required depending on the specific infrastructure requirements.
- **Biological Resources – Less than Significant**
    - *Impacts*: Both action alternatives could result in minor adverse impacts, with vegetation effects anticipated to be long-term due to ongoing live-fire and maneuver training. However, these impacts are considered to be minor and similar to the current activities occurring at Fort Sill. These impacts are not expected to have significant long-term effects on the viability of biological resources, as resident wildlife is likely to continue avoiding the impacted areas as previously documented.
    - *Best Management Practice(s)*: Implementing measures from the installation Integrated Natural Resources Management Plan, and existing BMPs, would effectively mitigate impacts. If new construction is needed, Endangered Species Act consultation with the U.S. Fish and Wildlife Service may be required. Additionally, using existing roads and adhering to established limits within training ranges and maneuver areas would help minimize potential adverse effects on protected species and their habitats.

- **Cultural Resources – Less than Significant**
  - *Impacts*: Increased training activities are expected to have less than significant impacts on cultural resources. However, an increase in personnel raises the risk of encountering or disturbing these resources. The addition of weapons systems and personnel may require new infrastructure or expanded training areas, though the extent, location, and design of potential construction are unknown. If new construction or repurposing of existing structures is necessary, supplemental NEPA documentation and/or Section 106 consultation would be required. Any ground-disturbing activities, which could impact cultural resources, would require identification before proceeding.
  - *Best Management Practice(s)*: Identifying resources within the area of potential effect before activities begin, combined with applying BMPs and mitigation measures, would help avoid adverse effects. Training personnel to report cultural materials, and implementing BMPs would further reduce potential impacts. While an increase in personnel raises the likelihood of encountering or disturbing cultural resources, adherence to SOPs and BMPs for resource training, identification, and protection would effectively mitigate these impacts. If new construction is required to implement this alternative, supplemental NEPA analysis might be required.
- **Geological and Soil Resources – Less than Significant**
  - *Impacts*: Implementing either action alternative would increase maneuver training, potentially damaging vegetation, disturbing soils, and causing erosion or altered drainage patterns. Construction activities may also compact soils, increase erosion and stormwater runoff, and affect groundwater recharge. Neither alternative is anticipated to impact geologic, or soil resources and population increases are not expected to impact soils beyond those effects from construction and training, resulting in only minor soil impacts.
  - *Best Management Practice(s)*: Adhering to stormwater management plans and BMPs, along with the Integrated Training Area Management work plan and the installation's Integrated Natural Resource Management Plan, will help minimize these impacts. Additionally, the Army's use of existing facilities and control measures will further mitigate potential effects.
- **Human Health and Safety – Less than Significant**
  - *Impacts*: The fielding and stationing of the proposed weapons systems under the action alternatives have the potential to impact human health and safety. HP-DE weapons systems, including lasers and high-power microwaves, may pose an increased risk of hazardous conditions. However, the 2015 Environmental Assessment for Demonstrations of Various Electric Fires and Loitering Aerial Munition Systems at Fort Sill, Oklahoma concluded that these advanced systems would have no significant impact on human health and safety, both on-post and in surrounding areas, due to established safety protocols. Since then, Fort Sill has conducted dozens of demonstrations involving high-energy lasers, high-power microwaves, and other weapon systems without incident.
  - *Best Management Practice(s)*: The Army will prioritize mitigating potential health risks associated with high-power microwave technology by continuously reviewing the latest research. To safeguard soldiers and civilians, the Army will establish comprehensive SOPs, Safety Danger Zones, and BMPs. These

measures, along with strict adherence to applicable regulations, will ensure the designation of clear safety zones around operational weaponry and radar systems to effectively prevent injuries.

- **Land Use – Less than Significant**
  - *Impacts*: The fielding and stationing of the proposed weapons systems under both action alternatives could affect land use at Fort Sill, depending on the storage locations and whether existing facilities are sufficient or new construction is needed. Specific details regarding weapons system storage are outside the scope of this PEA, and additional NEPA documentation may be required for a comprehensive analysis. Regarding training, the primary concern is not land availability but the potential for overlapping land uses. However, the existing training space is sufficient, and land use designations for training areas will remain unchanged.
  - *Best Management Practice(s)*: Range Operations mitigate overlapping training uses through monthly and quarterly deconfliction meetings. Adequate consultation with Range Operations and Real Property Management ensures potential land use changes and increased training demands are effectively managed.
- **Utilities – Less than Significant**
  - *Impacts*: The fielding and stationing of weapons systems under both action alternatives are expected to have less than significant impacts on utilities. Under alternative 1, the HP-DE systems would have no impact, and while the accompanying 3.9 percent population increase associated with the IFPC may drive a minor increase in utility demand, existing capacities are sufficient. Similarly, under alternative 2, the weapons systems themselves would not impact utilities, and the population increase is expected to be accommodated by existing capacities at Fort Sill.
  - *Best Management Practice(s)*: The increase in population could increase utility demand and the construction of additional infrastructure may be necessary. Specific utility demand and infrastructure improvement requirements cannot be quantified until specific facility and housing requirements are known. Supplemental NEPA documentation may be required before beginning construction.
- **Water Resources – Less than Significant**
  - *Impacts:* The fielding and stationing of weapons systems under both action alternatives are expected to have minimal impacts on water resources. These alternatives may require additional infrastructure or expanded training areas, though details are unknown, and supplemental NEPA analysis could be necessary for new construction. While increased personnel and industrial activity could slightly elevate risks such as accidental spills, trash entering waterways, or activities within floodplains, these impacts are expected to be minor. Similarly, under alternative 2, a 4.1 percent population increase, and related training activities may slightly affect the watershed, water demand, and treatment systems. Increased vehicle washing would be managed through closed-loop systems, mitigating potential impacts. Overall, both alternatives are anticipated to result in less than significant effects on water resources.

- *Best Management Practice(s):* Fort Sill employs robust measures to protect water resources and minimize impacts from training activities and construction. Spill containment and prevention measures outlined in the Spill Prevention, Control, and Countermeasures Plan, Installation Spill Contingency Plan, and Stormwater Management Plan prevent contaminants from reaching local aquifers. Training activities are coordinated with the Fort Sill Environmental Quality Division to avoid damage to wetlands, and modern oil-water separators, indoor repair practices, and secure storage facilities for hazardous materials further reduce risks. Floodplain impacts are minimized through adherence to Executive Order 11988, Floodplain Management requires the avoidance of floodplains when possible or, if unavoidable, adherence to specific elevation and design standards. Projects must also comply with Section 438 of the Energy Independence and Security Act, ensuring site hydrology is maintained or restored for federal projects exceeding 5,000 square feet. Additionally, Fort Sill mitigates training impacts through coordination with the Fort Sill Environmental Quality Division and the Integrated Training Area Management program to avoid sensitive areas. Implementation of these measures, along with BMPs and the Integrated Natural Resource Management Plan guidelines, ensures any impacts to water resources and floodplains remain less than significant.

## PUBLIC REVIEW AND INTERAGENCY COORDINATION

### Introduction

The PEA and Draft FONSI were made available for public, agency, and tribal review July 15, 2025 to August 14, 2025, which was initiated when a Notice of Availability was published in local newspapers. Electronic copies of the PEA and Draft FONSI were made available for download from the Fort Sill website at: https://sill-www.army.mil/usag/dpw/environmental/. Hard copies were also made available at the Lawton Public Library and the Fort Sill Nye Library. Comments were accepted by email at richard.a.mcdaniel49.civ@army.mil or by mail to Directorate of Public Works, Environmental Quality Division, Attn: AMIM-SIP-E (R. McDaniel), 2515 Ringgold Road, Fort Sill, OK 73503.

To facilitate intergovernmental and interagency coordination of environmental planning (IICEP), Fort Sill also sent IICEP letters to government agencies and Native American Tribes requesting their review and input. These letters were sent to the State Historic Preservation Office, the U.S. Fish and Wildlife Service, the U.S. Environmental Protection Agency, the Federal Aviation Administration, and local Native American Tribes.

### Comments Received and Responses

As part of Intergovernmental and Interagency Coordination for IICEP outreach for the PEA, two agency and tribal responses were received. The Comanche Nation provided a response indicating that the project had been reviewed against their site files to identify areas that may potentially contain prehistoric or historic archaeological materials, and an indication of “No Properties” was identified in accordance with 36 Code of Federal Regulations 800.4(d)(1). The Oklahoma Department of Environmental Quality also provided a response indicating that no adverse environmental impacts under their jurisdiction were anticipated. Copies of both

input provided by the Comanche Nation and the Oklahoma Department of Environmental Quality. No other public comments were received.

## CONCLUSION

Based on a careful review of the PEA, comments received during the 30-day public and agency comment period, as well as coordination with relevant parties through IICEP letters, the Army has determined that no significant direct, indirect, or reasonably foreseeable impacts to the human or natural environment are anticipated as a result of implementation of the proposed action. The Army concludes that the two action alternatives and no action alternative are not likely to have significant effects and that an environmental impact statement is not required and will not be prepared. This decision is based on the environmental and socioeconomic analysis contained in this PEA. This decision meets the requirements of NEPA and DoD NEPA implementing guidelines, and has been made after considering all submitted information and examining a full range of reasonable alternatives and all environmental impacts. This concludes the NEPA process for this action.

3 Sept 25

Derek R. Baird
Colonel, U.S. Army
Garrison Commander
Fort Sill, Oklahoma

Date

## FONSI APPENDIX A: SUMMARY OF THE EFFECTS FROM THE EVALUATED ALTERNATIVES

Summarized effects include direct, indirect, and reasonably foreseeable effects.

| Resource Area | Alternative 1 | Alternative 2 | No Action Alternative |
|---|---|---|---|
| **Air Quality** | Less than significant adverse effects | Less than significant adverse effects | None |
| **Biological Resources** | Less than significant adverse effects | Less than significant adverse effects | None |
| **Cultural Resources** | Less than significant adverse effects | Less than significant adverse effects | None |
| **Geological and Soil Resources** | Less than significant adverse effects | Less than significant adverse effects | None |
| **Human Health and Safety** | Less than significant adverse effects | Less than significant adverse effects | None |
| **Land Use** | Less than significant adverse effects | Less than significant adverse effects | None |
| **Utilities** | Less than significant beneficial effects | Less than significant beneficial effects | None |
| **Water Resources** | Less than significant adverse effects | Less than significant adverse effects | None |

## FONSI APPENDIX B: PUBLIC REVIEW, INTERAGENCY COORDINATION, AND COMMENTS RECEIVED

This appendix provides a summary of the public participation activities associated with this Programmatic Environmental Assessment (PEA).

The PEA and Draft Finding of No Significant Impact (FONSI) were made available to federal, state, local agencies, and Native American Tribes, and the public for review and comment for 30-days from July 15, 2025 to August 14, 2025. A Notice of Availability was published in local newspapers. Electronic copies of the PEA and Draft FONSI were made available for download from the Fort Sill website at: https://sill-www.army.mil/usag/dpw/environmental/. Hard copies were also made available at the Lawton Public Library and the Fort Sill Nye Library.

Following the 30-day review of the PEA and Draft FONSI, the Army incorporated relevant substantive comments received into the Final FONSI.

The following pages include copies of all comments received.

# COMANCHE NATION

Headquarters, United States Army Garrison, Fort Sill
Attn: Mr. Richard McDaniel
455 McNair Ave. Ste 119
Fort Sill, Oklahoma 73503-4541

July 25, 2025

Re: Programmatic Environmental Assessment (PEA) For Weapons Modernization
Stationing, Fielding, Operation, and maintenance at Fort Sill, Oklahoma

Dear Mr. McDaniel:

In response to your request, the above reference project has been reviewed by staff of this office to identify areas that may potentially contain prehistoric or historic archeological materials. The location of your project has been cross referenced with the Comanche Nation site files, where an indication of ***"No Properties"*** have been identified. (IAW 36 CFR 800.4(d)(1)).

Please contact this office at (580) 492-1153) if you require additional information on this project.

This review is performed in order to identify and preserve the Comanche Nation and State cultural heritage, in conjunction with the State Historic Preservation Office.

Regards
Theodore Villicana
Comanche Nation Historic Preservation Office
Theodore E. Villicana, Technician
#6 SW "D" Avenue, Suite C
Lawton, OK. 73502

COMANCHE NATION P.O. BOX 908 / LAWTON, OK 73502
PHONE: 580-492-4988 TOLL FREE:1-877-492-4988

**From:** DEQ EnvReviews
**To:** McDaniel, Richard Allen CIV USARMY ID-TRAINING (USA)
**Subject:** Environmental Impact Review
**Date:** Monday, July 21, 2025 11:50:15 AM
**Attachments:** image002.png

You don't often get email from envreviews@deq.ok.gov. Learn why this is important

Dear Mr. McDaniel:

In response to your request on behalf of Fort Sill, OK, we have completed a general environmental impact review for the project listed below.

**Project**
Letter dated July 9, 2025 – Programmatic Environmental Assessment (PEA) for Weapons Modernization Stationing, Fielding, Operations and Maintenance | Fort Sill, OK) | Comanche County

**Adverse Environmental Impacts Under DEQ Jurisdiction**
None anticipated.

Please submit future requests via either our online contact portal or email by attaching a single pdf file containing your request and any attachments.

Thank you for the opportunity to provide our comments. If you have any questions or need clarification, please contact me.

Respectfully,

**Jon Roberts | Env. Programs Manager III**
Office of Continuous Improvement | Department of Environmental Quality
p. 405-702-7111
Oklahoma.gov | deq.ok.gov
OKLAHOMA Environmental Quality