Pursuant to provisions of the National Environmental Policy Act (NEPA), 42 United States Code (U.S.C.) §§ 4321 to 4370h and Executive Order 12114, Environmental Effects Abroad of Major Federal Actions, the Department of the Air Force (DAF) prepared the attached Environmental Assessment/Overseas Environmental Assessment (EA/OEA) to address the potential environmental impacts from the Proposed Action of Decommissioning of Air Combat Maneuvering Instrumentation (ACMI) Towers. The attached EA/OEA is incorporated by reference in this Finding of No Significant Impact (FONSI)/Finding of No Significant Harm (FONSH).

Purpose and Need

The purpose of the Proposed Action is the decommissioning of 14 DAF ACMI towers, including 6 northern ACMI towers southeast of Carrabelle, Florida, and 8 southern towers northwest of Key West, Florida. The Proposed Action would allow the DAF to divest from infrastructure that is no longer needed to support DAF flight training requirements and that is deteriorated beyond economical repair. The Proposed Action is needed to eliminate navigational risks to vessels from the towers, to reduce the liability to the DAF from the deteriorating structural stability of the towers, and to forego increasing costs associated with tower maintenance.

Description of Proposed Action and Alternatives

The DAF is proposing to decommission 14 ACMI towers in the Gulf of Mexico (the Gulf of Mexico was renamed “Gulf of America” in January 2025). The proposed decommissioning activities would include removing ACMI electronics, dishes, batteries, and other hazardous equipment and disposal of enough of the support structure to eliminate navigational hazards to vessels.

Alternatives were developed that propose different methods related to severing depth and disposition. The depth of water and the tower type (barge or tripod) influenced the feasible alternatives for each tower. Due to its location within the Florida Keys National Marine Sanctuary, the only permittable alternatives for Station 14 are alternatives 2a, 3a, or 4a. The proposed alternatives for Station 11 are limited to alternatives 1 and 4 as they do not include moving the cut towers to an established or new artificial reef. This is due to the presence of an invasive coral species at Station 11. **Table 1** lists the proposed alternatives by station (tower) number. The terms tower and station are used interchangeably when referring to individual locations. Endangered Species Act (ESA) Consultation with National Marine Fisheries Service (NMFS) under Section 7 of the ESA has been completed for Alternative 4a only; all other action alternatives are “likely to adversely affect” federally-listed sea turtles.

Table 1 Proposed Alternatives by Station Number

Alternatives	Stations
1a: Mechanical Removal (Sever at the Bottom) and In-Place Disposition as an Artificial Reef	1-13
1b: Mechanical Removal (Sever Below Warning Buoy Depth) and In-Place Disposition as an Artificial Reef	4, 6, 10, and 11
2a: Mechanical Removal (Sever at Bottom) and Offshore Disposition in an Established Artificial Reefing Area	1-10 and 12-14
2b: Mechanical Removal (Sever Below Warning Buoy Depth) and Offshore Disposition in an Established Reefing Area	1-10, 12, and 13
3a: Mechanical Removal (Sever at Bottom) and Offshore Disposition in a new North/South Artificial Reefing Area	1-10 and 12-14
3b: Mechanical Removal (Sever Below Warning Buoy Depth) and Offshore Disposition in a new North/South Artificial Reefing Area	1-10, 12, and 13
4a: Mechanical Removal (Sever at the Bottom) and Onshore Disposition	1-14
4b: Mechanical Removal (Sever Below Warning Buoy Depth) and Onshore Disposition	4, 6, 10, and 11

Alternative 1: Mechanical Removal (Sever at the Bottom) and In-Place Disposition

Under Alternative 1, the towers would be removed by severing the support structure below the water surface using mechanical methods and disposing of the towers in place on the sea floor as an artificial reef. Under this alternative, the DAF would coordinate with U.S. Army Corps of Engineers (USACE) and Florida Department of Fish and Wildlife Conservation Commission (FWC) for the disposition of the tower structures in place as new artificial reefing areas. Artificial reefing permits would be obtained in compliance with 33 CFR Part 322, Permits for Structures or Work in or Affecting Navigable Waters of the United States. Before the towers are severed, all electronics, antennas, transmitters, solar arrays, batteries, hazardous materials, or other reusable and recyclable materials would be removed. These components would be disposed of through Defense Logistics Agency (DLA) Disposition Services. Two methods of mechanical removal are summarized below.

Under Alternative 1a, the towers would be severed at the mudline or at the barge structure. The barge structure for northern towers (stations 1-6) would be left in place. They would be cut into sections and placed on the ocean floor such that the tops of the structures are at depths and locations where buoys are not required by the U.S. Coast Guard (USCG) to ensure maximum navigational safety and to avoid the high cost of long-term buoy maintenance and oversight. These depths would provide for acceptable deep draft vessel navigation. Required permits would be obtained in compliance with 33 CFR Part 322.

Under Alternative 1b, the support structure would be severed at a depth and location where the USCG does not require buoys to ensure maximum navigational safety and to avoid the high cost of long-term buoy maintenance and oversight. The remaining structure would be cut into sections and placed on the ocean floor such that the tops of the structures are at depths and locations where the USCG does not require buoys. These depths would provide for acceptable deep draft vessel navigation. Required permits would be obtained in compliance with 33 CFR Part 322.

Alternative 2: Mechanical Removal and Offshore Disposition in an Established Artificial Reefing Area

Under Alternative 2, the DAF would coordinate with USACE and FWC for disposition of the tower structures in an established artificial reefing area closest to the tower. These distances range from 0.24 miles to 39 miles. An artificial reefing permit for each tower would be obtained in compliance with 33 CFR Part 322.

This alternative would remove towers by mechanically severing the towers' support structure. After they are removed, the severed towers would be loaded onto a surface craft or barge and transported to an existing artificial reefing area. Before the towers are severed, all electronics, antennas, transmitters, solar arrays, batteries, hazardous materials, or other reusable and recyclable materials would be removed. These components would be disposed of through DLA Disposition Services.

Under Alternative 2a, the towers would be removed by mechanically severing the towers' support structure at the bottom, as described under Alternative 1a. Under Alternative 2b, the towers would be removed by mechanically severing the towers' support structure below the warning buoy depth, as described under Alternative 1b.Alternative 3: Mechanical Removal and Offshore Disposition in a New Artificial Reefing Area

Under Alternative 3, the DAF would coordinate with USACE and FWC for disposition of the tower structures in newly established artificial reefing areas near the northern and southern towers. The exact locations of these areas would be identified in coordination with the permitting agencies. It is assumed that this alternative would require barging the towers longer distances compared with Alternative 2. An artificial reefing permit for both the northern and southern locations would be obtained in compliance with 33 CFR Part 322.

This alternative would remove towers by mechanically severing the towers' support structure. After they are removed, the severed towers would be loaded onto a surface craft or barge and transported to one of the two newly established artificial reefing areas (north or south), depending on the location of the tower. Before the towers are severed, all electronics, antennas, transmitters, solar arrays, batteries, hazardous

materials, or other reusable and recyclable materials would be removed. These components would be disposed of through DLA Disposition Services.

Under Alternative 3a the towers would be removed by mechanically severing the towers' support structure at the bottom, as described under Alternative 1a. Under Alternative 3b, the towers would be removed by mechanically severing the towers' support structure below the warning buoy depth, as described under Alternative 1b.

Alternative 4: Mechanical Removal and Onshore Disposition

Under Alternative 4, the towers would be removed by mechanically severing the towers' support structure. After they are removed, the severed towers would be loaded onto a surface craft or barge and transported to shore. The disposition location would be at a predetermined salvage or disposal location. Materials would be recycled to the maximum extent possible. Before the towers are severed, all electronics, antennas, transmitters, solar arrays, batteries, hazardous materials, or other reusable and recyclable materials would be removed. These components would be disposed of through DLA Disposition Services.

Under Alternative 4a, the towers would be removed by mechanically severing the towers' support structure at the bottom, as described under Alternative 1a. Under Alternative 4b, the towers would be removed by mechanically severing the towers' support structure below the warning buoy depth, as described under Alternative 1b. This is the Preferred Alternative as it avoids the potential for adverse impacts to federally-listed sea turtles that may occur under any of the other action alternatives.

No Action Alternative

Analysis of the No Action Alternative provides a benchmark, enabling decision-makers to compare the magnitude of the potential environmental effects of the Proposed Action. NEPA requires an EA/OEA to analyze the No Action Alternative. No action means that an action would not take place at this time, and the resulting environmental effects from taking no action would be compared with the effects of allowing the proposed activity to go forward. No action for this EA/OEA reflects the status quo, where the ACMI towers would not be decommissioned. Under the No Action Alternative, the ACMI towers would require inspection and maintenance to ensure they do not become safety or navigational hazards.

Summary of Findings

Potentially affected environmental resources were identified through communications with state and federal agencies and review of past environmental documentation. Specific environmental resources with the potential for environmental consequences were analyzed in the EA/OEA and are summarized below.

Marine Biological Resources

Under Alternative 1a, there would be short-term adverse impacts on hardbottom habitats, plankton and invertebrates, and coral communities because some attached flora and fauna or infaunal species may be crushed during placement or may be relocated to a depth that is unsuitable because of changes in light penetration, pressure, currents, or other ambient conditions. The impacts would not be significant. Direct, indirect, and cumulative effects on fish, marine mammals, and sea turtles from implementation of Alternative 1a would be unlikely to occur and would not be significant. Marine mammals and fishes may experience short-term, localized adverse behavioral disturbance impacts during underwater cutting. The impacts would not be significant. Long-term beneficial impacts are expected to marine biological resources from the increase in hardbottom habitat resulting in a reef effect that encourages colonization by assemblages of both sessile and mobile animals. The impacts would not be significant. Alternative 1a would not affect the content or management attributes of any Essential Fish Habitat (EFH).

Alternative 1b would leave some vertical sections of the towers at most tower locations, and mobile species may continue to be attracted to them. All other effects described for the relocated previously colonized and uncolonized sections would be the same as described for Alternative 1a.

Potential impacts of Alternatives 2a and 2b would be similar to those described for Alternatives 1a and 1b. The increase in habitat for marine biological resources would occur at the established reef sites rather than at the tower sites, which may reduce the colonization time since there may be more individuals and potentially greater diversity of species at the established reef sites.

Potential impacts of Alternatives 3a and 3b would be similar to those described for Alternative 1a and 1b. The increase in habitat for marine biological resources would occur at two new reef sites rather than at the tower sites. This difference may increase the colonization time since there may be fewer individuals and potentially lower diversity of species at these unestablished reef sites.

Potential impacts of Alternatives 4a and 4b would be similar to those described for Alternatives 1a and 1b, except that onshore disposal would result in a permanent loss of a small amount of hardbottom habitat and attached fauna at each tower site because the tower structures would be removed. This loss would cause a long-term adverse impact on marine biological resources. The impacts would not be significant.

Because all action alternatives may affect federally listed species and/or their habitat, the DAF was required to consult with U.S. Fish and Wildlife Service (USFWS) and NMFS under Section 7 of the ESA of 1973. The DAF completed two Biological Assessments (BAs) to meet these requirements. The DAF reached a No Effect determination for Gulf sturgeon (*Acipenser oxyrinchus desotoi*) and a "may affect, but not likely to adversely affect" determination for Rice's whale (*Balaenoptera ricei*), green sea turtle (*Chelonia mydas*), Kemp's ridley sea turtle (*Lepidochelys kempii*), leatherback sea turtle (*Dermochelys coriacea*), loggerhead sea turtle (*Caretta caretta*), hawksbill sea turtle (*Eretmochelys imbricata*), giant manta ray (*Manta birostris*), Nassau grouper (*Epinephelus striatus*), oceanic whitetip shark (*Carcharhinus longimanus),* and the smalltooth sawfish (*Pristis pectinate)* under any of the action alternatives. During ESA Section 7 consultation with NMFS, it was determined that all action alternatives except 4a are likely to adversely affect ESA-listed sea turtles through the risk of entanglement or entrapment in marine debris that may become attached to the portion of the towers that would remain extending above the sea floor. Consultation with NMFS under Section 7 of the ESA for Alternative 4a was concluded on July 23, 2025 with a Letter of Concurrence (see **Final EA, Appendix B – B.2.5.2**).

The Magnuson-Stevens Fishery Conservation and Management Act requires federal agencies to consult with the Secretary of Commerce, through NMFS, with respect to "any action authorized, funded, or undertaken, or proposed to be authorized, funded, or undertaken, by such agency that may adversely affect any essential fish habitat identified under this Act," 16 U.S.C. § 1855(b)(2). The DAF completed an EFH Assessment to meet the requirement for consultation with NMFS and determined that the Proposed Action would have short-term, adverse impacts on EFH. The impacts would not be significant. Consultation was concluded on December 13, 2024 when NMFS concurred with this assessment (see **Final EA, Appendix B – Section B.2.5.1**)

Terrestrial Biological Resources

All action alternatives would cause short-term adverse impacts to terrestrial biological resources (birds and bats) from disturbance during removal and long-term adverse impacts from the loss of roosting habitat. The impacts would not be significant. Removal of the towers would provide a long-term beneficial impact by eliminating the risk of collisions with the tower. There would be no difference in impacts on terrestrial biological resources among the alternatives.

Since the Proposed Action may affect federally listed species or their habitat, the DAF was required to consult with USFWS and NMFS under Section 7 of the ESA. The DAF completed two BAs to meet these requirements. The DAF made a "no effect" determination for the West Indian manatee (*Trichechus manatus latirostris*), and a "may affect, not likely to adversely affect" determination for the tricolored bat (*Perimyotis subflavus*), piping plover (*Charadrius melodus*), black-capped petrel (*Pterodroma hasitata*), and roseate tern (*Sterna douglallii*) under all action alternatives. Consultation concluded on February 19, 2025 when USFWS concurred with these determinations (see **Final EA, Appendix B – Section B.2.5.3**)

Air Quality

All action alternatives would result in short-term adverse impacts on air quality. The impacts would not be significant. Operation of construction equipment associated with the Proposed Action would not generate substantial criteria pollutant emissions; the criteria pollutant emissions from any of the alternatives would be well below General Conformity Rule *de minimis* thresholds.

Water Resources

All action alternatives would result in short-term adverse impacts on water quality from severance operations, vessel discharges, tower paint, and potential antifouling treatments. Additionally, operations such as anchoring, excavation, jetting, and lifting and toppling of tower sections would result in the temporary resuspension of unconsolidated sediments that would increase suspended solids or turbidity; these sediments are expected to rapidly disperse and resettle on the seafloor. The impacts would not be significant.

DAF has determined that the Proposed Action would be consistent to the maximum extent practicable with the enforceable policies of the Florida Coastal Management Program. Consultation with the Florida State Clearinghouse concluded on August 1, 2025 (see **Final EA, Appendix B – Section B.2.7**).

Geological Resources

All action alternatives would result in short-term adverse impacts on geological resources on the seafloor. The impacts would not be significant. Alternatives 1, 2, and 3 would result in both short-term (resuspension of sediments) and long-term (semi-permanent seafloor coverage) disturbances to the seafloor. The extent of the short-term sediment disturbance would be limited to a small area around each tower. The resuspension of sediments would result in a short-term increase of suspended solids or turbidity that would likely disperse quickly and resettle on the seafloor. Alternative 4 would cause short-term disturbances as the towers are removed, but no long-term adverse impacts because the portion of the towers removed would be disposed of on shore. The impacts would not be significant.

Cultural Resources

None of the action alternatives would affect any historic properties, traditional cultural properties, or sacred sites, as none are recorded within or adjacent to the Area of Potential Effects (APE), and it is not anticipated that any undiscovered resources would be disturbed or otherwise affected. If unexpected cultural resources are encountered at any time within the APE, when practicable, work would cease in the immediate vicinity of such discoveries. There could be instances, however, where work could not be terminated immediately based on safety or other concerns. Therefore, in accordance with the National Historic Preservation Act (NHPA) and regulations set forth in 36 CFR 800.4(d)(1), the DAF determined that no historic properties would be affected by implementation of the Proposed Action under any of the action alternatives. Consultation with the Florida SHPO concluded on August 1, 2025 (see **Final EA, Appendix B – Section B.2.7**).

Socioeconomics and Recreation

Alternatives 1, 2, 3, and 4b would result in long-term beneficial impacts on socioeconomics and recreation from the increase in artificial reef area. The impacts would not be significant. Depending on the height of the tower, varying amounts of additional artificial reef would be created at each tower location. These areas of additional artificial reef would provide more areas for divers to explore. The increase in artificial reef area could attract more recreational use and therefore have a beneficial impact on both recreation and socioeconomic conditions (through increased recreational expenditures). Although the above-water portion of the tower would no longer serve as a visual indicator of the location of the artificial reef, fishermen and boat captains could use Global Positioning System units to locate the sunken tower sections. Therefore, there would be no anticipated adverse impacts to socioeconomics or recreation from implementation of Alternatives 1, 2, 3, and 4b.

Alternative 4a would result in a long-term adverse impact on socioeconomics and recreation, as it would eliminate existing opportunities for divers and anglers at the towers. The impact would not be significant.

There would be a short-term beneficial impact to the local economy from decommissioning expenditures. The impacts would not be significant.

Hazardous Materials and Waste

All action alternatives would result in short-term adverse impacts from generation of small amounts of hazardous waste associated with removal of tower equipment. Planning that would take place prior to demolition would ensure proper handling, storage, transportation, and disposal of any hazardous waste to a qualified facility. The impacts would not be significant

Alternatives 1, 2, 3, and 4b would also cause long-term adverse impacts from tower paint and potential antifouling treatments on the existing towers that are degrading and releasing these by-products into the marine environment. The impacts would not be significant. Analysis of samples from the northern towers detected low levels of lead; no polychlorinated biphenyls were detected. The U.S. Environmental Protection Agency does not consider the lead in paints in vessels being utilized as artificial reefs as a significant environmental or human health hazard.

Alternative 4a would have the same short-term impacts but no long-term impacts, as the entire tower structure would be removed from the marine environment. The impacts would not be significant.

Health and Safety

All action alternatives would result in short-term adverse impacts to the safety of workers during demolition and disposition and potential short-term adverse impacts to the public if an accident during operations created a release or exposure to chemical or toxic substances. The impacts would not be significant.

Adherence to Occupational Safety and Health Administration standards, Air Force Occupational Safety, Fire, and Health Standards, DAF standards, and the project-specific Safe Work Plan and protective measures would minimize the potential risk for impacts to the safety of individuals. To minimize the risk of direct impacts to public health and safety, trained lookouts would be in place during demolition and disposition to detect the presence of recreational or commercial boats and ensure that any boaters in the area would be asked to leave the work area for public safety. Indirect health and safety impacts to the public could occur if an accident during operations created a release or exposure to chemical or toxic substances. These risks would not be significant given the distance of the towers to any public receptors and the lack of significant quantities of chemical or toxic substances to be used.

Reasonably Foreseeable Future Actions

When considered with other reasonably foreseeable future actions occurring in or adjacent to the project area, the Proposed Action would not contribute to significant cumulative impacts on resources analyzed in the EA/OEA.

Mitigation Measures

The analysis concluded that the Alternative 4a would not result in significant environmental impacts; therefore, no mitigation measures would be required. Best management practices, protective measures, and environmental commitments would continue where applicable.

Public Involvement

The Draft EA/OEA was made available for a 30-day public review period in accordance with NEPA. The Draft EA/OEA was also made available to Florida state agencies for a concurrent 60-day review period through the Florida Department of Environmental Protection State Clearinghouse process. A Notice of Availability was published in the *Tallahassee Democrat, The Naples Daily News,* and *Key West Citizen* inviting the public to review and comment on the Draft EA during the 30-day public comment period. The Draft EA and proposed FONSI/FONSH were also available online for public review on the Tyndall Air Force Base website at: https://www.tyndall.af.mil/About/Environmental/AboutUs/Home/Contact.aspx/. Printed copies of the Draft EA/OEA and proposed FONSI/FONSH were available for public review at the Leroy

Collins Leon County Main Public Library, 200 W Park Ave, Tallahassee, FL 32301, the Naples Regional Library, 650 Central Ave, Naples, FL 34102, and the Monroe County Public Library, 700 Fleming Street, Key West, Florida 33040. No public comments were received.

Conclusion

FONSI: After review of the EA/OEA for the Decommissioning of ACMI Towers incorporated by reference, I have determined that Alternative 4a will not have a significant impact on the quality of the human or natural environment with implementation of the identified regulatory compliance measures described in the **Final EA/OEA, Chapter 4**. Accordingly, an Environmental Impact Statement is not required. The signing of this FONSI completes the environmental impact analysis process.

FONSH: Based on the information gathered and analyses presented during preparation of the EA/OEA, the DAF finds that Alternative 4a in support of the decommissioning of ACMI towers would not cause significant harm to the environment of the global commons. As a result, an Overseas Environmental Impact Statement will not be prepared.

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8/26/25

MATTHEW T. OLSON, Lt Col, USAF
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DATE