

Draft Finding of No Significant Impact

Environmental Assessment of the Utah Data Center Campus Expansion

Bluffdale, Utah

The National Security Agency (NSA) prepared an Environmental Assessment (EA) to identify and evaluate potential environmental, cultural, and socioeconomic consequences that could occur with the implementation of the campus expansion proposed in the 2020 *NSA-Utah Master Plan Study* for the Utah Data Center (UDC) in Bluffdale, Utah. NSA prepared the EA in accordance with the National Environmental Policy Act of 1969 (NEPA), as amended (*United States Code* [U.S.C.] Title 42, Sections 4321 through 4347); the President's Council on Environmental Quality's (CEQ's) Regulations for Implementing the Procedural Provisions of NEPA, as amended (*Code of Federal Regulations* [CFR] Title 40, Parts 1500 through 1508); Department of Defense (DOD) Instruction 4715.9, Environmental Planning and Analysis; Environmental Analysis of Army Actions (32 CFR Part 651); and NSA's NEPA procedures.

1.0 Description of the Proposed Action and Alternatives

NSA proposes to expand the UDC Campus to support administrative functions that are being consolidated from other locations in the region and an increase in the number of staff. The new components include two administrative buildings; a commons building; parking structures; a vehicle control point (VCP); a Security Forces administrative facility; a warehouse; supporting utility, road, and stormwater management improvements; and renewable energy infrastructure, such as solar panels and geothermal fields. The existing data center facilities will not be expanded.

Construction of the UDC Campus expansion is planned to occur in two phases as funding becomes available. Phase 1 would include the construction of an approximately 110,000-gross-square-foot (GSF) administrative building, which would have offices, conference rooms, and an assembly area. The Phase 1 administrative building would provide office space to accommodate up to 500 personnel who would be either new full-time staff or staff relocated from another NSA Utah location. Phase 1 would also include the construction of an approximately 37,000-GSF commons building, which would have a physical fitness area, cafeteria, and meeting areas. The new associated parking structure would accommodate the parking for existing and planned Phase 1 growth personnel. In addition, the VCP would include two incoming traffic lanes and two police officer booths with a canopy. The total estimated staff working at the site would be 750 after Phase 1 has been completed.

Phase 2 would include the construction of a second administrative building (approximately 120,000 GSF) that would accommodate 500 new full-time staff; a parking structure; a warehouse; a Security Forces administrative facility, which would have an indoor firing range and adjacent security vehicle parking; and a third incoming traffic lane and police officer booth at the VCP. The total estimated staff working at the site would be 1,250 after both phases are completed.

Two Build Alternative sites are under consideration for the UDC Campus expansion: Alternative 1: East Side Development, and Alternative 2: West Side Development. Under Alternative 1, the Preferred Alternative, the new facilities would be located east of the existing buildings on the UDC Campus and the renewable energy infrastructure would be located west and northeast of the existing buildings. Under Alternative 2, the proposed UDC Campus expansion would include new construction similar to the Preferred Alternative but the location would be on the west side of the existing UDC Campus. The steep topography of the west side would require additional grading and stabilization by constructing substantial retaining walls adjacent to the new facilities. Alternative 2 is not preferred for mission reasons.

In addition to the Build Alternatives, NSA considered a No Action Alternative. Under the No Action Alternative, the proposed expansion of the UDC Campus would not occur. Although the No Action Alternative would not allow NSA to meet the purpose and need for the Proposed Action, this alternative was carried forward as a baseline for comparison to the Build Alternatives.

2.0 Summary of Environmental Resources and Impacts

Based on the analysis in the EA, NSA has determined that the Build Alternatives have the potential to result in adverse environmental impacts. The analysis results are summarized as follows.

2.1 Land Use and Visual Resources

No impact to land use would be expected from construction and operation under the Build Alternatives. Local, minor, adverse, short-term impacts on the viewshed would be expected from construction of the Build Alternatives. Local, minor, adverse, long-term impacts on the viewshed would be expected from operation of the Build Alternatives. However, Alternative 2 would be built primarily to the west of the UDC Campus, farther away from populated areas, and many of the new buildings would not be visible from surrounding viewpoints compared to the Preferred Alternative, which would be more visible on the east side of the UDC Campus.

2.2 Noise

Local, minor, adverse, short-term impacts from noise would be expected during construction of the Build Alternatives as a result of operating construction equipment and vehicles. Operation of the Build Alternatives would include an increase in vehicular traffic accessing the UDC Campus, resulting in local, negligible, adverse, long-term impacts from noise.

2.3 Air Quality

Construction activities under the Build Alternatives would have minor, adverse, short-term impacts on local air quality and negligible, adverse, short-term impacts on regional air quality. Air pollutant emissions would be generated from construction activities such as grading, filling, compacting, and trenching. The combustion of fossil fuels during construction activities would be expected to contribute to greenhouse gases, resulting in regional, negligible, adverse, short-term impacts. Operation under both Build Alternatives would result in emissions from boilers, vehicles, and operation of the firing range, causing negligible, adverse, long-term impacts on regional air quality.

2.4 Geology and Soils

The Build Alternatives would not impact geology or prime farmlands. Impacts on topography from the Build Alternatives would be expected to be local, negligible, adverse, and long-term from leveling and grading the site. Local, minor, adverse, long-term impacts on soils during construction of the Build Alternatives would be expected because of the potential for an increase in erosion and sedimentation; however, the implementation of best management practices (BMPs) would minimize soil erosion and sedimentation.

2.5 Biological Resources

Both Build Alternative would result in minor, adverse, long-term impacts on local vegetation. Local, negligible, adverse, short-term impacts would be expected to wildlife under each alternative.

Several federally and state-listed threatened or endangered species have potential to occur within the project area. However, it has been determined that the Build Alternatives would have no effect on federal Endangered Species Act-listed species or critical habitat. The likelihood of occurrence of state-recognized Species of Greatest Conservation Need is low. Therefore, impacts on threatened and endangered species are expected to be local, negligible, adverse, and short-term. Migratory bird nesting habitat is present on vegetated slopes and in and around stormwater detention basins; therefore, BMPs are recommended under the Build Alternatives to reduce or avoid impacts. Both Build Alternatives are expected to have local, negligible, adverse, short-term impacts on migratory birds.

2.6 Infrastructure

Implementation of the Build Alternatives would result in negligible-to-minor, adverse, short- and long-term impacts on water supply, sanitary sewer and wastewater systems, and stormwater systems. Potential increases in the demand for these utilities would not be anticipated to exceed existing capacity.

No impacts would be expected to communications from construction or operation of the Preferred Alternative. Alternative 2 would require the relocation of existing communication ducts and result in potential temporary interruptions of communication services. Therefore, impacts on communications from implementation of Alternative 2 would be expected to be local, minor, adverse, and short-term.

2.7 Sustainability

Local, minor-to-moderate, beneficial, long-term impacts would be expected on sustainability from the implementation of the Build Alternative because of the incorporation of sustainability strategies, life-cycle cost-effectiveness, and resource-use-efficiency standards to the maximum extent practicable. Both Build Alternatives would be guided by Leadership in Energy and Environmental Design (LEED) Silver Certification Standards and conform to guiding principles established by the CEQ's standards for High Performance Sustainable Buildings and the Guiding Principles.

2.8 Transportation

Local, minor, adverse, short-term impacts on transportation would occur during construction activities under the Build Alternatives. Moderate, adverse, long-term impacts on local traffic patterns and levels of service are expected under both Build Alternatives because of the increase in the number of employees and visitation. However, the Mountain View Corridor Project and construction of a new access road would help accommodate the increase in traffic. Local, minor, beneficial, long-term impacts to onsite circulation and access are anticipated under the Build Alternatives following construction of a new VCP, relocation of the employee parking lot, and construction of new access roads.

Internal circulation under Alternative 2 would differ with construction of the access road along and within the western edge of the security perimeter fence from the VCP to the proposed parking structures. Roadways under Alternative 2 would have a steeper grade than those under the Preferred Alternative because of slopes to the west of the existing data center, resulting in the potential for problems during inclement weather and additional winter maintenance.

2.9 Hazardous Materials and Wastes

Impacts from hazardous materials, hazardous waste, and solid waste would be comparable under both Build Alternatives. Local, negligible-to-minor, adverse, short-term impacts would result from the generation of construction debris from the demolition of existing structures and support features. The operation and maintenance of the indoor firing range would result in local, minor, adverse, long-term impacts.

2.10 Safety

Under the Build Alternatives, onsite construction personnel adhering to established safety requirements would experience local, minor, adverse, short-term impacts during construction activities. With the adherence to established safety procedures and regulations, daily operations of the Build Alternatives would have no impact on the health and safety of onsite personnel or the offsite community.

2.11 Socioeconomics and Environmental Justice

Local, minor, beneficial, short-term and long-term impacts on socioeconomics from construction and operation of the Build Alternatives would be expected from the potential use of local labor and materials and incidental spending in the local area by construction workers and additional personnel during operation.

Although there are environmental justice populations within the area, they would not experience disproportionate impacts from construction or operations of the Build Alternatives. Therefore, there would be no impacts on environmental justice populations.

2.12 Best Management Practices and Mitigation Measures

The Preferred Alternative includes BMPs, mitigation measures, and design concepts to avoid adverse impacts to the extent practicable, as summarized in Table 2-1.

Table 2-1. Summary of Environmental Impacts from the Project Alternatives

Resource	Alternative 1: East Side Development (Preferred Alternative)	Alternative 2: West Side Development	No Action Alternative
Land Use	No impact would be expected as implementation would not prevent the continued use, occupation, or viability of areas on or surrounding the site.	Alternative 2 is not consistent with the Regulating Plan; however, NSA would update the plan for consistency if Alternative 2 were implemented. Therefore, no impacts would be expected.	No impacts anticipated.
Visual Resources: Construction	Local, minor, adverse, short-term impacts would be expected during construction from stockpiles of materials, construction vehicles onsite, and partially constructed facilities.	Impacts during construction would be similar to those described for the Preferred Alternative.	No impacts anticipated.
Visual Resources: Operation	Local, minor, adverse, long-term impacts would be expected during operation from incorporating the facilities and new roads into the landscape, including photovoltaic solar panels and light sources outside proposed buildings, near parking areas, and along outdoor walkways.	Impacts from operation would be similar to those described for the Preferred Alternative. However, at this location, new light sources would be farther from populated areas and many of the new buildings would not be visible from surrounding viewpoints.	No impacts anticipated.
Noise: Construction	Local, minor, adverse, short-term impacts would be expected from the operation of construction equipment and vehicles during construction.	Impacts from construction would be similar to those described for the Preferred Alternative.	No impacts anticipated.
Noise: Operation	Local, negligible, adverse, long-term impacts would be expected from operation because of an increase in vehicular traffic accessing the UDC Campus.	Impacts from operation would be similar to those described for the Preferred Alternative.	No impacts anticipated.
Air Quality: Construction	Local, minor, adverse, short-term impacts and regional, negligible, adverse, short-term impacts would result from the generation of air pollutant emissions from grading, filling, compacting, and trenching.	Impacts from construction would be similar to those described for the Preferred Alternative.	No impacts anticipated.
Air Quality: GHG—Construction	Regional, negligible, adverse, short-term impacts would be expected from construction as a result of combusting fossil fuels.	Impacts from construction would be similar to those described for the Preferred Alternative.	No impacts anticipated.
Air Quality: Operation	Regional, negligible, adverse, long-term impacts would be expected from operation as a result of pollutant emissions from boilers, vehicles, and operation of the firing range.	Impacts from operation would be similar to those described for the Preferred Alternative.	No impacts anticipated.
Geology and Soils: Geology	No impacts would be expected from implementation as no unique landforms occur within the project area and geologic hazards were considered during siting of the Preferred Alternative.	No impacts would be expected from implementation, as described under the Preferred Alternative.	No impacts anticipated.
Geology and Soils: Topography	Local, negligible, adverse, long-term impacts would be expected from implementation as a result of grading, leveling, and stabilization.	Impacts would be similar to those described for the Preferred Alternative. However, as a result of the steeper grade, additional grading and stabilization would be required for construction.	No impacts anticipated.

Resource	Alternative 1: East Side Development (Preferred Alternative)	Alternative 2: West Side Development	No Action Alternative
Geology and Soils: Soils	Local, minor, adverse, long-term impacts would be expected from implementation because of increased erosion and sedimentation potential. The Preferred Alternative would disturb approximately 35.2 acres of soil.	Impacts would be similar to those described for the Preferred Alternative. However, Alternative 2 would disturb 30.5 acres of soils.	No impacts anticipated.
Geology and Soils: Prime Farmlands	No impact on prime farmlands would occur because there are no prime farmlands within the region of influence.	No impact on prime farmlands would occur because there are no prime farmlands within the region of influence.	No impacts anticipated.
Biological Resources: Vegetation	Local, minor, adverse, long-term impacts from the removal of approximately 21 acres of vegetation are expected.	Impacts would be similar to those under the Preferred Alternative. However, 23 acres of vegetation would be removed.	No impacts anticipated.
Biological Resources: Wildlife	Local, negligible, adverse, short-term impacts are expected because of the noise disturbance and increased human activity during construction.	Impacts would be similar to those described under the Preferred Alternative.	No impacts anticipated.
Biological Resources: Threatened and Endangered Species	Local, negligible, adverse, short-term impacts are expected because of the potential of Species of Greatest Conservation Need species to occur within the region of influence.	Impacts would be similar to those described under the Preferred Alternative.	No impacts anticipated.
Biological Resources: Migratory Birds	Local, negligible, adverse, and short-term impacts are expected to result from the presence of species on vegetated slopes and stormwater detention basins.	Impacts would be similar to those described under the Preferred Alternative.	No impacts anticipated.
Infrastructure: Water Supply	Local, minor, adverse, short-term impacts would be expected from construction because of a potential brief interruption of potable water service. Regional, negligible, adverse, long-term impacts would occur during operation because of additional potable and non-potable water requirements.	Impacts from construction and operation on the water supply and non-potable water would be the same as those described for the Preferred Alternative.	No impacts anticipated.
Infrastructure: Sanitary Sewer and Wastewater System	Local, minor, adverse, short-term impacts from construction would be expected as a result of potential sewer system disruption. Operation would cause regional, negligible, adverse, long-term impacts from an expected increase of sanitary sewer discharge.	Impacts would be the same as those described for the Preferred Alternative.	No impacts anticipated.
Infrastructure: Stormwater	Local, negligible-to-minor, adverse, short-term impacts from construction would be expected as a result of disturbance, soil erosion, sediment transport, and soil compaction. Operation could have local, negligible, adverse, long-term impacts from adding new stormwater management areas and a new detention basin.	The construction and operational impacts would be similar to those described under the Preferred Alternative.	No impacts anticipated.

Resource	Alternative 1: East Side Development (Preferred Alternative)	Alternative 2: West Side Development	No Action Alternative
Infrastructure: Electrical System	No impacts on the existing electrical duct bank systems would be expected during construction. Operation could lead to local, negligible, adverse, long-term impacts from adding renewable energy infrastructure.	Impacts would be similar to those described for the Preferred Alternative.	No impacts anticipated.
Infrastructure: Communications	No impacts from construction or operation would be expected.	Local, minor, adverse, short-term impacts would be expected as a result of relocating existing communication ducts and potential temporary interruptions to communication services.	No impacts anticipated.
Transportation: Construction	Local, moderate, adverse, short-term impacts would be expected from construction because of moderate traffic increases on local roadways.	Impacts from construction would be similar to those described under the Preferred Alternative.	No impacts anticipated.
Transportation: Traffic	Local, minor, adverse, long-term impacts on traffic patterns would be expected because of an increase of approximately 1,100 vehicles accessing the site per day.	Impacts would be similar to those described under the Preferred Alternative.	No impacts anticipated.
Transportation: Onsite circulation and access	Local, minor, beneficial, long-term impacts on circulation and access would be expected because of the construction of a new VCP and moving employee parking.	Impacts would be similar to those described under the Preferred Alternative, however, internal circulation would differ because of the construction of a new internal access road and steeper grade of roadways.	No impacts anticipated.
Hazardous Materials and Wastes	Local, negligible-to-minor, adverse, and short- to long-term impacts would be expected from implementation because of the use, storage, and disposal of hazardous materials such as petroleum products in support equipment, paints, welding gases, solvents, and sealants; construction of the indoor firing range; installation of geothermal wells, energy infrastructure, and photovoltaic solar panels; and construction activities of the new Security Forces administrative building during the Phase 2 efforts. Impacts would result from the generation of construction debris from the demolition of existing structures and support features.	Impacts would be comparable to those described under the Preferred Alternative.	No impacts anticipated.
Safety: Construction	Local, minor, adverse, short-term impacts from construction would be expected to onsite construction personnel through the adherence of established safety requirements.	Impacts from construction would be comparable to those described under the Preferred Alternative.	No impacts anticipated.
Safety: Operation	No impact would be expected from operation.	No impact would be expected from operation.	No impacts anticipated.

Resource	Alternative 1: East Side Development (Preferred Alternative)	Alternative 2: West Side Development	No Action Alternative
Socioeconomics	Local, minor, beneficial, long-term impacts would be expected because of the potential use of local labor and materials during construction, increased employment opportunities, and economic gains in the form of increased wages and spending.	Impacts would be the same as those described under the Preferred Alternative.	No impacts anticipated.
Environmental Justice	No impacts are expected.	No impacts are expected.	No impacts anticipated.
Sustainability	Local, minor-to-moderate, beneficial, long-term impacts would be expected because of the use of sustainable strategies, including strategic planning for water efficiency, energy conservation, reducing the carbon footprint, and managing solid waste.	Impacts would be similar to those described under the Preferred Alternative.	No impacts anticipated.

3.0 Regulations

The Proposed Action would not violate the provisions of NEPA, DOD Instruction 4715.9. Environmental Planning and Analysis, or any other federal, state, or local environmental regulations.

4.0 Commitment to Implementation

NSA affirms its commitment to implement this Proposed Action in accordance with NEPA. Implementation is dependent on funding. NSA will make sure adequate funds are requested in future years' budgets to achieve the goals and objectives set forth in the EA.

5.0 Public Review and Comment

The Draft EA was made available for public review and comment from 7 February 2025 through 9 March 2025 at the Saratoga Springs Public Library in Saratoga Springs, Utah, and the Lehi City Public Library in Lehi, Utah. Comments received were incorporated into the analysis of potential environmental impacts performed as part of the Final EA.

6.0 Finding of No Significant Impact

After a review of the EA prepared in accordance with the requirements of NEPA, CEQ's implementing regulations, and receipt of public comments on the Draft EA and Draft FONSI, NSA has determined that the Preferred Alternative would not have a significant impact on the quality of the human or natural environment and, therefore, an Environmental Impact Statement does not need to be prepared. This decision has been made after taking into account all submitted information and considering a full range of practical alternatives that would meet project requirements and that are within the legal authority of NSA.

[Name]

Date

[Title]