

**DRAFT FINDING OF NO SIGNIFICANT IMPACT (FONSI)
AND
FINDING OF NO PRACTICABLE ALTERNATIVE (FONPA)**

INVASIVE SPECIES MANAGEMENT

Travis Air Force Base and Geographically Separated Units, California

Pursuant to provisions of the National Environmental Policy Act (NEPA), Title 42 United States Code (USC) §§4321 to 4347, implemented by the Council on Environmental Quality (CEQ) Regulations, Title 40, Code of Federal Regulations (CFR) Parts 1500-1508, and 32 CFR Part 989, *Environmental Impact Analysis Process*, the U.S. Air Force (Air Force) assessed the potential environmental consequences associated with invasive species management using manual and mechanical control, chemical treatments, prescribed burning, and livestock grazing, at Travis Air Force Base (AFB), Solano County, California, and Geographically Separated Units (GSUs) in Solano and Contra Costa Counties, California. Pursuant to the California Code of Regulations (Title 14, §15220 and following) the California State Water Resources Control Board intends to rely on the EA and FONSI/FONPA in the place of a mitigated negative declaration and believes that the federal documents meet regulatory requirements. This Environmental Assessment (EA) is incorporated by reference into this finding per 40 CFR 1508.13 and 40 CFR 1502.21.

The purpose of the Proposed Action is to manage invasive species on Travis AFB and GSUs in order to reduce the prevalence of invasive species to protect and preserve the military mission, ecosystem function, and valued resources and programs. The need for the Proposed Action is to address the threats of numerous invasive plant species on Travis AFB. There is a need to eliminate or control known priority infestations, and to prevent the establishment of new infestations of invasive species. If allowed to spread unchecked, invasive species would degrade the remaining native habitat; interfere with management of sensitive resources, economic activities, and quality of life; and may impede the military mission.

The Environmental Assessment, incorporated by reference into this finding, analyzes the potential environmental consequences of invasive species management actions on Travis AFB and GSUs and provides environmental protection measures to avoid or reduce adverse environmental impacts from those actions.

The EA considers all potential impacts of Alternative 1 (No Action Alternative) and Alternative 2 (Comprehensive Management). The EA also considers cumulative environmental impacts with other projects within the Region of Influence.

ALTERNATIVE 1 (No Action Alternative)

Under the No Action Alternative, current management activities would continue. Current control includes limited, small-scale manual/mechanical plant removal and chemical applications. Grazing would continue on existing pastures, but there would not be the option to expand operations into new areas, change stocking rates, or vary residual dry matter targets in accordance with annual weather variability or specific invasive species control objectives. Sporadic prescribed burning activities would continue to occur on a limited scale. Under the No Action Alternative management activities lack a programmatic, cohesive approach and long-term strategy; do not utilize the most effective treatment methods; do not consider the most current science, data and analyses, and management recommendations; and do not fully address current Integrated Natural Resources Management Plan and associated program management goals.

ALTERNATIVE 2 (Comprehensive Management)

Under Alternative 2, non-native species would be managed to reduce their prevalence using an efficient, sustainable, and long-term strategy that incorporates a programmatic, adaptive approach, and maximizes opportunities for stewardship of sensitive resources. Alternative 2 would utilize a varied toolkit of control methods including manual/mechanical removal, chemical applications, livestock grazing, and prescribed burning. The Travis AFB Invasive Species Management Plan, Updated Invasive Plant Species Management Plan, Grazing Management Plan, Aquatic Pesticide Application Plan, and Wildland Fire Management Plan provide the basis for this alternative. Alternative 2 would allow for more effective non-native species control than the other alternatives because it includes a variety of control methods, allows for control anywhere on the base with the implementation of environmental protection measures, allows for livestock grazing in more areas and with greater management flexibility, and more acres would be burned annually.

SUMMARY OF FINDINGS

The analyses of the affected environment and environmental consequences of implementing Alternative 2 presented in the EA concluded that by implementing standing environmental protection measures and operational planning, the Air Force would be in compliance with all terms and conditions and reporting requirements for implementation of the reasonable and prudent measures stipulated by applicable Agencies including the United States Fish and wildlife Service (USFWS). Additional conditions are stipulated in the State Historic Preservation Officer (SHPO) concurrence, the Aquatic Pesticide Application Plan for the Statewide General National Pollutant Discharge Elimination System (NPDES) Permit for Residual Aquatic Pesticide Discharges to Waters of the United States (WoUS) from Algae and Aquatic Weed Control Applications, Water Quality Order 2013-0002-DWQ, and requirements of Bay Area and Yolo-Solano Air Quality Management Districts' burn permits and Smoke Management Plans.

The General Conformity Rule applies to actions in air quality nonattainment or maintenance areas and considers both direct and indirect emissions. The rule applies only to federal actions that are considered "regionally significant" or where the total emissions from the action meet or exceed the de minimis thresholds presented in 40 CFR §93.153. The BAAQMD is currently designated as non-attainment relative to air quality standards for Ozone (O3) and PM2.5. The YSAQMD is currently designated as non-attainment relative to air quality standards for O3 and PM2.5. For all other pollutants, the BAAQMD and YSAQMD are considered to be in attainment with national air quality standards. The additional emissions from Alternative 2 would not result in an exceedance of General Conformity thresholds.

The Air Force has concluded that no significant adverse effects would result to the following resources as a result of Alternative 2: Socioeconomic Resources and Growth-Inducing Impacts, Environmental Justice, Aesthetics, Agricultural and Forest Resources, Recreation, Noise, Cultural and Tribal Cultural Resources, Air Installation Compatible Use Zone (AICUZ), Land Use, Air Quality, Water Resources, Safety and Occupational Health, Hazardous Materials and Waste, Biological and Natural Resources, Earth Resources, Utilities and Infrastructure, Transportation and Traffic, Energy Resources, Climate Change and Wildfire. No significant adverse cumulative impacts would result from activities associated with Alternative 2 when considered with past, present, or reasonably foreseeable future projects.

Socioeconomic Resources and Growth-Inducing Impacts –The Proposed Action would not contribute to changes in socioeconomic resources, such as impacts on housing availability, employment, community resources or local population. Grazing expansion under the Proposed Action would increase the number of acres available to be leased for grazing. This would have a direct, permanent beneficial effect for both the USAF, in the form of increased revenue, and the lessees, in the form of available land. Other activities would have no impact on socioeconomic resources. Leases are awarded in a competitive bid process that would be open to any interested parties. Grazing leases do not affect properties outside of the base. Finally, the Proposed Action would not lead to unplanned population growth and would not displace any people or housing; invasive species control is not related to human population growth. Therefore, there would be no adverse impact to socioeconomic resources as a result of the Proposed Action.

Environmental Justice - Schools, childcare centers, and youth centers on Travis AFB are all located in the cantonment or housing areas, which are the center for residential and commercial facilities on the base. Only very temporary, intermittent impacts would occur as a result of the Proposed Action. None of these facilities is located in an area that would experience disproportionately high and adverse impacts. Treatments would not be conducted on the aforementioned sites. There are no senior facilities located on the base. Treatments would occur solely on the base and would not affect off-base populations. The Proposed Action would not include any activities that would discriminate in any way on the basis of race, color, national origin, age, or income.

Aesthetics – The Proposed Action would not have adverse effects on scenic vistas, would not damage scenic resources including trees, rock outcroppings, or historic buildings and would not degrade the existing visual character or quality of public views. The project would not create a new source of substantial light or glare that would affect day or nighttime views in the area.

Agricultural and Forest Resources – As the Proposed Action aims to improve native landscapes, grazing lands and forested landscapes would be maintained. Effects are expected to be beneficial. The Proposed Action would not convert farmland to another use, would not conflict with existing zoning for agricultural use, and would not conflict with existing zoning for or cause rezoning for forest lands or timberlands.

Recreation – The Proposed Action would not involve construction or expansion of recreational areas or facilities and could improve but would not negatively impact existing recreation facilities. Invasive plant removal at restoration sites, natural areas, and hiking trails would improve recreation opportunities. Any impacts to access or use of outdoor recreation from prescribed burns would be temporary.

Noise – Only minimal, short-term changes to ambient noise levels would occur as a result of implementing the Proposed Action. All activities would be conducted during business hours in areas where there is existing noise from aircraft, vehicle traffic, and occasional heavy equipment use.

Cultural and Tribal Cultural Resources – No impacts to cultural or tribal cultural resources would occur. Adverse effects from livestock would be avoided by coordinating the location of livestock-holding areas, water sources, and mineral supplements with the base Cultural Resources Manager and placing them outside of cultural resource site boundaries. The location of any soil-disturbing invasive plant treatments would be approved by the Cultural Resources Manager and earth disturbing equipment would not be used within cultural resource site boundaries. Restoration treatments in areas with sensitive cultural resources would be limited to re-seeding and other activities that would not require soil disturbance.

Air Installation Compatible Use Zone (AICUZ) – There would be no effects to the base AICUZ. All land uses would be compatible with the Travis AFB use zones. Prescribed burns would be scheduled so as to avoid impacts to visibility and flight capabilities near the airfield.

Land Use – There would be no irreversible effects to land use, or changes to land use designation as a result of the Proposed Action. Any land improvements or infrastructure installed for livestock grazing expansion could be removed if mission requirements change. Any other effects to land use would be minor and temporary.

Air Quality – Negligible to moderate adverse effects to air quality may result from prescribed burns. The effects would be temporary, localized, and mitigated by the implementation of a Smoke Management Plan, and therefore would not be significant. Emissions resulting from construction equipment, vehicles, mowers, and hand-held equipment would not affect regional air quality attainment status. Grazing lessees and construction projects would be required to comply with standard mitigation measures and fugitive dust control mitigation measures to minimize air quality impacts. None of the active herbicide ingredients proposed for use are subject to the California Department of Pesticide Regulation's non-fumigant volatile organic compounds regulations. Herbicides with the potential to emit volatile organic compounds or to create drift would not be applied under conditions when volatilization or drift are likely to occur.

Water Resources – Under the Proposed Action no significant effects to water resources would occur. Livestock would either be excluded from aquatic resources or would be closely managed in areas where they could access aquatic resources. Herbicide-specific application buffers would be implemented around aquatic resources to prevent contamination. Any herbicide application in or adjacent to aquatic resources would be done using aquatic-approved herbicides and would follow the Aquatic Pesticide Application Plan best management practices and monitoring requirements. Work conducted in wetlands and 100-year floodplains would be anticipated to have overall beneficial impacts by improving water flow and wetland hydrology. Ground disturbance within wetlands and floodplains would be minimized to the greatest extent possible, including limiting firebreak creation to non-soil disturbing methods. A Notice of Intent to prepare an EA for Proposed Actions that would occur in floodplains and may affect wetlands was published soliciting public comments in the Daily Republic and Tailwind newspapers on 10 February and 19 February 2021 respectively. The notice invited the public to provide comments on the proposal and any practicable alternatives that may reduce impacts within 30 days. No comments were received.

Safety and Occupational Health and Public Services – Effects on occupational health and safety would not be expected, but adverse effects could occur if appropriate safety procedures were not followed. Prescribed fire plans would be prepared for prescribed burns, which would contain applicable safety measures to be followed and required personal protective equipment. Exposure to toxic levels of herbicides would be avoided by following applicable state and federal laws, label instructions, DoD requirements, and best management practices included in the EA. Herbicide would only be applied by California or DoD qualified or certified applicators. Appropriate personal protective equipment would be worn when using manual or mechanical equipment, and Air Force safety protocols would be followed. Finally, invasive species control activities would not

result in adverse physical impacts to government facilities, would not require new or altered government facilities in order to maintain service ratios, and would not alter response times of any public service offered on Travis AFB.

Hazardous Materials/Waste – Minor effects from hazardous materials and hazardous waste generation could occur as a result of the Proposed Action. There are Environmental Restoration Program Sites throughout Travis AFB. Environmental Baseline Surveys would be conducted for these areas prior to pasture construction to identify any risks to humans or livestock. Personnel would be trained to identify and avoid unexploded ordinances during prescribed burns and other soil disturbing activities. Hazardous waste would be generated in the form of herbicide containers; these would be disposed of at appropriate facilities on or off Travis AFB.

Biological/Natural Resources – The effects of the Proposed Action on biological resources would be largely beneficial. Non-native and noxious plant species often out compete native plant species leading to lower plant biodiversity and degraded fish and wildlife habitat. Negative effects to biological resources are possible but would be minimized with the implementation of Avoidance and Minimization Measures and Best Management Practices in this EA. Herbicides would be used in accordance with label instructions and applicable federal, state, and DoD regulations in addition to requirements in this EA. These are designed to prevent toxic effects to nontarget vegetation, fish, and wildlife. Species-specific and aquatic resource herbicide buffers would minimize the risk of exposure to special status species. Protective buffers and firebreaks that do not require soil disturbance would be used to avoid effects to special status plants and animals, and their habitat during prescribed burns. Livestock grazing would be carefully managed and monitored to avoid negative effects from inappropriate levels of grazing. Travis AFB has consulted with the USFWS to identify measures that would be implemented to protect special status species.

Earth Resources – The Proposed Action does not have the potential to alter or otherwise affect geology or topography or minerals. The effects of the Proposed Actions on soils would be largely beneficial. Invasive plants can increase the risk of soil erosion and alter soil chemical composition, so controlling these plants would indirectly benefit soils. Restoration treatments would benefit soils by restoring native vegetation, increasing vegetative cover and soil moisture retention, and reducing soil erosion. Cattle and other livestock could directly and indirectly, adversely, temporarily or permanently impact soils. However, with routine rangeland monitoring and carefully managed grazing effects to soil would be negligible to minor. Prescribed burns would be conducted in ways that limit fire intensity and would not result in a severe fire that could negatively impact the physical and chemical properties of the soils. Adverse effects to soils and soil biomes from herbicide would be avoided by adherence to the herbicide application Best Management Practices.

Utilities and Infrastructure – The Proposed Action would have an overall benefit to utilities and infrastructure. Expansion of the grazing program would benefit utilities and infrastructure by maintaining roads and waterlines, adding fencing, and reducing fire risk. Chemical treatments would have no effect on utilities and infrastructure. Overall, prescribed burns would have beneficial effects on infrastructure by reducing fuel loads but could negatively affect utilities and infrastructure if they got out of control. Negative effects would be avoided through the implementation of Prescribed Fire Plans for prescribed burns. Manual, mechanical and restoration treatments may involve excavation and could harm utilities and infrastructure if lines or pipes were broken. This would be avoided by obtaining the proper clearance prior to earth disturbing work.

Transportation and Traffic – The Proposed Action would have minor impacts to transportation during grazing infrastructure construction, prescribed burns, chemical treatments, and mechanical treatments. During these activities, an increase in traffic would be expected by

contractors through the South and Main Gates for large equipment and would include light construction vehicles and personal vehicles through the Main and North Gates. Construction vehicles on these roadways could disrupt traffic speeds and increase gate delays. Impacts would be short term in nature and localized. Smoke from prescribed burns could have temporary adverse effects on transportation and traffic by obscuring visibility for drivers. Prescribed fire signs would be posted along roadways and Security Forces would conduct traffic control as needed.

Energy Resources – The use of energy resources associated with the increased effort to control invasive species would be minor and would not be wasteful, inefficient or unnecessary. All energy use would be for temporary weed control projects and would not use energy continuously over time. Besides the energy resources consumed during transportation to and from field sites, mechanical equipment would use oil and gasoline. Overall, the project would have negligible impacts to local and regional energy supplies.

Climate Change – Maximum carbon dioxide equivalent emissions under Alternative 2 would be 942.4 tons of carbon dioxide equivalent per year. This increase comes primarily from proposed prescribed burns on 493 acres of grasslands with fuel loads averaging around 2,000 lbs per acre. These emissions would not exceed threshold limits for stationary, operational-related activities or construction-related activities and would be in line with the Feather River Air Quality Management District's (FRAQMD) guidelines, which has not set thresholds for GHG emissions. While the Proposed Action would result in GHG emissions during implementation, it would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs. The climate change impact from the Proposed Action would, therefore, be minor and temporary, and would not be significant.

Wildfire - While invasive species activities may increase vehicle or ATV traffic on little used, dirt and gravel roads as well as some off-road travel, thereby increasing the risk of fire, all staff follow fire precautions. The Proposed Action would not impair emergency response or evacuation plans, does not exacerbate wildfire risk, does not include installation of equipment such as utility lines that exacerbate wildfire risks, and would not be expected to expose people or structures to downstream flooding or landslides as a result of runoff or post-fire slope instability. Overall, the Proposed Action would have a beneficial impact on wildfire severity as it would expand prescribed burning, grazing and mowing practices which reduces fuel loads and fire risk.

FINDING OF NO PRACTICABLE ALTERNATIVE (FONPA)

Executive Order (EO) 11990, *Protection of Wetlands*, (24 May 1977) directs agencies to avoid to the extent possible the long- and short-term adverse impacts associated with the destruction or modification of wetlands and to avoid direct or indirect support of new construction in wetlands wherever there is a practicable alternative. Federal agencies are to avoid new construction in wetlands, unless the agency finds there is no practicable alternative to work within wetlands and the proposed projects incorporate all possible measures to limit harm associated with work done in wetlands. Agencies should use economic and environmental data, agency mission statements, and any other pertinent information when deciding whether or not to build in wetlands. EO 11990 directs each agency to provide for early public review of plans for construction in wetlands. In accordance with EO 11990 and 32 CFR Part 989, a Finding of No Practicable Alternative (FONPA) must accompany the Finding of No Significant Impact (FONSI) stating why there are no practicable alternatives to development within or affecting wetland areas.

Similarly, EO 11988, *Floodplain Management* (May 24, 1977), requires Federal agencies to avoid to the extent possible the long and short-term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct and indirect support of floodplain development wherever there is a practicable alternative. If it is found that there is no practicable alternative, the agency must minimize potential harm to the floodplain and circulate a notice explaining why the action is to be located in the floodplain prior to taking action. Finally, new construction in a floodplain must apply accepted flood proofing and flood protection to include elevating structures above the base flood level rather than filling in land. In accordance with EO 11988, a FONPA must accompany the FONSI stating why there are no practicable alternatives to development within or affecting floodplains.

Wetlands: There is no practical alternative to conducting the Proposed Action in wetlands, because many of the targeted plants grow in wetlands. The Proposed Action would include all practicable measures to minimize harm to wetlands. Wetland impacts would be reduced to the maximum extent possible through project design and implementation of environmental protection measures. Pursuant to §404(b)(1) of the CWA, wetland impacts must be avoided to the greatest extent practicable. Maps and geographic information system (GIS) data of existing wetlands would be used to identify wetlands within an area before implementing control activities. Any necessary agency coordination and required permits would be acquired prior to commencing any activities. Measures to minimize wetland impacts may include site plan reconfiguration to avoid impacts and installation of buffer areas along the perimeter of wetlands. Activities associated with these projects would be conducted in accordance with the California General National Pollutant Discharge Elimination System permit and its associated procedures as detailed in the Aquatic Pesticide Application Plan.

As noted in the attached EA, there are no practicable alternatives to the Proposed Actions that would avoid all impacts or further minimize impacts to wetlands because the objectives sought by these projects preclude the selection of any practicable alternatives due to mission requirements, installation layout constraints, and the nature of proposed projects. Taking all the environmental, economic, and other pertinent factors into account, pursuant to EO 11990, the authority delegated by Secretary of the Air Force Order 791.1, and taking into consideration the submitted information, I find that there is no practicable alternative to this action and the Proposed Action includes all practical measures to minimize harm to the environment.

Floodplains: There is no practical alternative to conducting the Proposed Action in floodplains, because many of the targeted plants grow in floodplains. All invasive plant control is anticipated to have direct and indirect beneficial impacts to floodplains. The invasive plant treatments would reduce the hazard and risk of flood loss by improving water flow and floodplain functionality by

controlling invasive vegetation growing in waterways and floodplains. Successful invasive plant control and revegetation of floodplains with native plant species would help to reduce the impact of floods on human safety, health, and welfare. If this work is not conducted in floodplains, invasive plants currently degrading floodplains and water ways would not be controlled, which would lead to increased risk of flood damage and reduced floodplain functionality and biodiversity. Impacts to floodplains related to the Proposed Actions would, in general, be minimized through implementation of an approved avoidance and minimization measures, best management practices, and other appropriate environmental protection measures; and through adherence to the Statewide General National Pollutant Discharge Elimination System Permit for Residual Aquatic Pesticide Discharges to Waters of the United States from Algae and Aquatic Weed Control Applications, Water Quality Order 2013-0002-DWQ and Travis Air Force Base specific Aquatic Pesticide Application Plan. The Proposed Action would not lead to loss of, or long-term impacts to floodplains and would be largely beneficial.

As noted in the attached EA, there are no practicable alternatives to the Proposed Actions that would avoid all impacts or further minimize impacts to floodplains because the objectives sought by these projects preclude the selection of any practicable alternatives due to mission requirements and the nature of the proposed project. Project alternatives were evaluated throughout the base using the selection criteria identified in the EA. The remaining projects that would impact floodplains are constrained to their proposed locations due to the nature of the projects. Taking all the environmental, economic, and other pertinent factors into account, pursuant to EO 11988, the authority delegated by Secretary of the Air Force Order 791.1, and taking into consideration the submitted information, I find that there is no practicable alternative to this action and the Proposed Action includes all practical measures to minimize harm to the environment.

FINDING OF NO SIGNIFICANT IMPACT (FONSI)

Based on my review of the facts and analyses presented in the attached EA, I conclude that the Proposed Actions would not have a significant impact on the natural or human environment either by itself or cumulatively. The requirements of NEPA and the CEQ's regulations have been fulfilled. An Environmental Impact Statement is not required and will not be prepared.



NAME, RANK, TITLE Date

TITLE