

**FINDING OF NO SIGNIFICANT IMPACT/
FINDING OF NO PRACTICABLE ALTERNATIVE**

NARLON BRIDGE REPLACEMENT PROJECT; UPRR SANTA BARBARA SUBDIVISION AT

VANDENBERG AIR FORCE BASE, CALIFORNIA

DRAFT 8/30/2019

This Finding of No Significant Impact (FONSI) / Finding of No Practicable Alternative (FONPA) hereby incorporates by reference and attaches hereto the “Final Environmental Assessment (EA), Narlon Bridge Replacement Project; Union Pacific Rail Road [UPRR] Santa Barbara Subdivision MP 291.33, [APNs] Vandenberg Air Force Base [VAFB], Santa Barbara County”. This EA considered all Proposed Action and No-Action Alternative potential environmental impacts and cumulative impacts, and identified measures to avoid and/or minimize environmental impacts.

PROPOSED ACTION

The Proposed Action (Alternative A) is a UPRR (Private) project on VAFB (Federal Land) that was developed based on the purpose, need, and selection criteria discussed in Chapter 1 and 2 of the attached EA. The Proposed Action is replacing the 720-foot-long open-deck Narlon Bridge crossing San Antonio Creek with the same or similar materials and design, and constructing two temporary access/work bridges on either side of the existing bridge to facilitate using equipment and avoiding San Antonio Creek impacts. The Proposed Action would be implemented in four phases at six general areas that comprise the Proposed Action Area (as described in Section 2.2.1), totaling approximately 24.01 acres. Phase 1 would involve installing environmental protection measures, while Phase 2 would entail preparing access and laydown areas at the six project areas. Phase 3 would involve removing and replacing the Narlon Bridge in segments and using the staging areas. Phase 4 would involve demobilizing all equipment and restoring or revegetating affected areas. Mitigation/site restoration would be implemented in two stages: Stage 1 would stabilize the site with hydromulch, erosion control blankets, and grass seed. Stage 2 would eradicate weeds and restore native vegetation within the Action Areas. The mitigation site would be monitored for a minimum of five years to assess planting efforts effectiveness and receive needed follow-up maintenance.

UPRR needs the Proposed Action to replace its deteriorating steel bridge that crosses San Antonio Creek. Since the bridge’s 1896 construction the steel supports have corroded and deteriorated, making the bridge need replacement. UPRR’s need for the Proposed Action is also to maintain UPRR safety standards, comply with Federal Railroad Administration (FRA) regulations, and maintain uninterrupted service for freight and passenger rail. If not replaced, the existing bridge poses a safety risk to continued rail use for interstate commerce and passenger service. If the bridge continues deteriorating, it may be deemed unsafe, and rail traffic would not be allowed to cross. Without this bridge, rail traffic would have to be diverted inland to California’s Central Valley, southeast to Barstow, back to Los Angeles, and up to Santa Barbara, resulting in delays to passenger and freight trains. No viable alternatives were identified that would meet the need for the proposed replacement project.

NO ACTION

The Council on Environmental Quality Regulations requires assessing the No Action Alternative (40 Code of Federal Regulations [CFR] § 1502.14). Under the No Action Alternative, the existing Narlon Bridge would continue deteriorating and remain non-compliant with UPRR design specifications and FRA regulations. Bridge maintenance would no longer suffice to make the structure serviceable for transporting commodities and passengers. The inability to transport goods and materials to and from VAFB would affect the Base's mission to improve infrastructure and support operations (e.g., use of the Rail Garrison infrastructure). [As stated in my EA review, I don't know if UPRR's rail is needed for VAFB's missions; this includes VAFB's Rail Garrison. I recommend CEIEA check on this.] The existing Narlon Bridge would continue to pose a safety risk to rail use. In addition, bridge collapse, damage, or emergency repairs would potentially significantly impact special status species and Waters of the United States. UPRR would continue necessary maintenance and emergency repairs to the structure. Future bridge emergency repairs may involve the following: required at-grade bridge across San Antonio Creek, replacing damaged fiber optic cables; significant impacts to the riparian zone; and constructing support structures that would increase the floodplain and riparian zone bridge footprint. The No-Action Alternative would not meet the Proposed Action's purpose and need.

SUMMARY OF FINDINGS

The attached EA analyzed the potential environmental consequences of activities associated with the Proposed Action and the No-Action Alternative. Based on the analysis, neither the Proposed Action nor the No-Action Alternative would result in individual or cumulatively significant impacts to any resources. However, we noted potential adverse impacts for the Proposed Action to the following resources: air quality, biological resources, cultural resources, earth resources, hazardous materials and waste management, human health and safety (noise), Coastal Zone management, solid waste management, transportation, and water resources. We noted some Proposed Action aspects as potentially beneficial to biological resources and water resources. If the existing bridge experiences a catastrophic failure, adverse impacts from the No-Action Alternative could be greater than the Proposed Action. Otherwise, the No-Action Alternative would result in impacts less than the Proposed Action. Environmental protection measures incorporated into the Proposed Action (identified as required in the EA) would be implemented to avoid and/or minimize the potential adverse impacts. Discretionary environmental protection measures may further reduce potential impacts of the Proposed Action.

NOTICE OF WATERS OF THE U.S. INVOLVEMENT

Pursuant to Executive Order (EO) 11990, *Protection of Wetlands*, EO 11988, *Floodplain Management*, and Air Force Instruction (AFI) 32-7064, *Integrated Natural Resources Management*, the U.S. Air Force (USAF) hereby provides notice of the potential impacts Waters of the U.S., wetlands, and water quality because of the Proposed Action. Jurisdictional wetlands were not found in the Project Area but may occur upstream or downstream from the Proposed Action Area. San Antonio Creek, which flows through the Proposed Action Area, meets the criteria for federal (non-wetland) waters. Potential impacts to these wetlands and Waters of the U.S. may occur, but are not likely to occur, because of the proposed activities. Temporary impacts to adjacent riparian habitat, considered Waters of the State of California, are unavoidable and have been minimized to greatest extent practicable by the Proposed Action.

Other alternatives were reviewed during the EA development process under the requirements of NEPA but were eliminated from further detailed analysis in the EA because they did not meet

the stated purpose and need for the action, were not practicable, or would have led to greater overall environmental impact. The only practicable alternative is the Proposed Action. For the reasons stated in the EA, the dismissed alternatives are not practicable alternatives to avoiding the potential impacts to Waters of the State of California. The Proposed Action would avoid impacts to Waters of the U.S.

Similarly, there is no practicable alternative to implementing the Proposed Action outside of the San Antonio Creek floodplain since the Narlon Bridge provides interstate transportation to publicly critical access points north and south of VAFB. The USAF has a no net loss policy on wetlands and impacts to the floodplain that contains state wetland (willow riparian) acreage will comply with the terms of the *Statewide General Waste Discharge Requirements for Dredged or Fill Discharges to Waters Deemed by the U.S. Army Corps of Engineers to be Outside of Federal Jurisdiction, Order No. 2004-0004-DWQ* (WDR). UPRR is committed to mitigating the temporary impacts to the state wetland area by restoring and enhancing wetlands at the bridge location immediately downstream of the project area.

PUBLIC REVIEW AND COMMENT

The Final Draft EA and FONSI/FONPA were made available for public review and comment for 30 days following the publication of the Notice of Availability (NOA) in the following newspapers: Lompoc Record and Santa Maria Times. The Final Draft EA and FONSI/FONPA were also distributed per the current VAFB NEPA Distribution List, including the State Clearinghouse. Appendix O contains a copy of the NOA, proofs of publication, proof of library deliveries, VAFB's NEPA distribution list, and public comments received, including VAFB responses.

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Based on my review of the facts and analyses contained in the attached EA conducted in accordance with the National Environmental Policy Act, 42 U.S. Code 4321 et seq., implementing Council on Environmental Quality Regulations, 40 CFR 1500-1508, and 32 CFR Part 989, *Environmental Impact Analysis Process*, I conclude that implementing the Proposed Action (chosen alternative), with incorporation of required environmental protection measures, will not have a significant effect on the human environment. Pursuant to EO 11990, *Protection of Wetlands*, EO 11988, *Floodplain Management*, AFI 32-7064, *Integrated Natural Resources Management*, and the authority delegated by Secretary of the Air Force Order 791.1, and taking the above information into account, I find that there is no practicable alternative to this action and that the Proposed Action includes all practicable measures to minimize harm to the floodplain and dune scrub habitat environments. Therefore, further analysis in the form of an environmental impact statement is not required and a FONSI/FONPA is appropriate.

MICHELLE A. LINN, GS-15, DAFC
Command Civil Engineer

Date

Attachment: FINAL ENVIRONMENTAL ASSESSMENT (2019)
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AT VANDENBERG AIR FORCE BASE, CALIFORNIA