

**DRAFT FINDING OF NO SIGNIFICANT IMPACT
TRANSMISSION LINE EASEMENT
EDWARDS AIR FORCE BASE, CALIFORNIA**

Pursuant to the National Environmental Policy Act (NEPA), Title 42 United States Code (USC) Section 4321 et seq.; the Council on Environmental Quality (CEQ) regulations for implementing the procedural provisions of the NEPA, Title 40 of the Code of Federal Regulations (CFR) Sections (§§) 1500-1508; the Department of the Air Force (Air Force) Environmental Impact Analysis Process (EIAP), 32 CFR Part 989; and the Interim CEQ Policy updating the regulations implementing the procedural provisions of NEPA, the Air Force has prepared an environmental assessment (EA) identifying and evaluating the potential effects of issuing an out grant for a 100-foot wide transmission line easement to a private sector applicant (known as the Applicant). The Applicant will then construct, operate, and maintain an approximately 6.5 mile-long electrical transmission line across a portion of Edwards Air Force Base (AFB), California. The terms of the easement would provide for the Applicant to pay the Air Force fair market value rent for use of the property and would be for a term of 50 years. Pursuant to 32 CFR Part 989.15(a), the EA is incorporated by reference in this Finding of No Significant Impact (FONSI).

Purpose of and Need for the Proposed Action (EA §1.1, pages 1 to 2): The purpose of the Proposed Action is to support public interest for the citizens of the United States (US) by granting an easement for a portion of Air Force land as well as Bureau of Land Management (BLM) withdrawn land within an existing utility corridor on Edwards AFB (or Edwards). This would allow the conveyance of energy produced by the Applicant's future photovoltaic solar facility (known as the Aratina Solar Project) to the state of California electrical grid. The need for the Action is in accordance with 10 USC §2668 which allows granting of easements under the following specified terms:

“If the Secretary of a military department finds that it will not be against the public interest, the Secretary may grant, upon such terms as the Secretary considers advisable, easements for rights-of-way over, in, and upon public lands permanently withdrawn or reserved for the use of that department, and other lands under the Secretary's control for... poles and lines for the transmission or distribution of electric power.”

Background (EA §1.2, pages 2 to 3): The Applicant is proposing to construct a photovoltaic solar facility on approximately 2,317 acres of privately owned land located at the northern boundary of Edwards AFB along State Route (SR) 58 at the north-east corner of the installation (EA Figure 1-3, page 6). The Applicant has need of constructing a transmission line in order to connect their solar facility to an existing substation with the required capacity. The land under review is a combination of Air Force land and BLM land withdrawn for use by the Air Force and under the control of the Air Force in accordance with Executive Order 8450 (1940). During scoping, the BLM was contacted to inform them the Air Force was considering a utility easement out grant for these parcels of land. Both the Air Force and BLM determined the Air Force has the authority to grant an easement under 10 USC §2668.

DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

Selection Criteria for Alternative Sites (EA §2.1, pages 10 to 11): The location for the proposed transmission line on Edwards AFB had to meet the following criteria to be considered a reasonable alternative:

- Connect to an existing 230 kilovolt (kV) substation that has capacity and offers additional redundancy to distribute energy produced by the Aratina Solar Project
- Minimize the length of the transmission line through a direct route from the Aratina Solar Project to the closest 230 kV substation
- Minimize the number of transmission towers, reducing ancillary support components (wires, access roads, etc.) associated with the transmission line, which means increased reliability/less risk of problems that

would impact energy resiliency benefits to Edwards AFB and the surrounding communities including Boron

- Minimize the number of transmission poles in order to not conflict with Edwards operational and mission considerations
- Minimize development and timing costs to increase the potential to offer lower rates to energy users
- Maximize use of existing access/maintenance roads associated with already existing infrastructure

Alternative Locations Outside of Edwards Air Force Base (EA §2.2.2, pages 11 to 12): The Aratina Solar Project is a separate project proposed by the Applicant to develop a photovoltaic solar facility and associated infrastructure necessary to generate up to 530 megawatt of renewable energy, including up to 600 megawatts of energy storage, on approximately 2,317 acres of privately owned land. This project was approved by the Kern County Board of Supervisors on October 12, 2021 after the County completed its environmental impact report (EIR) review under the California Environmental Quality Act (CEQA).

Two substations, Southern California Edison (SCE) Holgate and SCE Kramer, are within the project area, and the Applicant evaluated potential transmission line routes to both substations. As currently configured, the SCE Kramer substation is larger than the SCE Holgate substation, and has additional available capacity, and is therefore the preferred substation. During siting review of the transmission line to SCE Kramer Substation, the Applicant determined approximately 8 to 10 miles would need to traverse multiple private lands and within county road franchise right of ways in order to make the connection to the Kramer Substation using a route off Edwards AFB. Unlike public utilities, the Applicant does not have the power of eminent domain; therefore, it would not be possible to cross multiple land owners if permission is not granted. In addition, the private land connection would cross SR 58 two times before connecting to SCE Kramer Substation. It was determined constructing the transmission line outside of Edwards AFB across private land would not provide the shortest route and would not minimize development and time costs. Based on this review, only the Proposed Action was carried forwarded for further analysis, and the No Action Alternative evaluates the potential transmission line connection to the Holgate Substation.

Proposed Action (EA §2.3, pages 12 to 28): The Proposed Action involves construction and operation of a 6.5 mile long, 230 kV electrical transmission line (also called a gen-tie) within a 100-foot-wide easement on Edwards AFB. The 230 kV line may be constructed as either a double-circuit or single-circuit line; however, the environmental impacts would be the same. The location would be immediately south of the existing SCE overhead power line and access road that spans east to west along the corridor. The transmission line would deliver power generated by the Aratina Solar Project to the existing SCE Kramer Substation. This allows for maximum use of existing dirt roads thereby minimizing new ground disturbance. The tangent transmission structures would be set in an augured hole, typically ranging between 6 to 10 feet in diameter and 15 to 25 feet in depth below the ground surface. The dead end structure would be placed in concrete pier foundations. The annular space between the transmission poles and holes would be backfilled with concrete or soil. The excavated soil would then be spread around the temporary work areas. The electric transmission line would be supported by transmission towers up to 125 feet in height above ground surface. Approximately 16.707 acres would be temporarily disturbed for construction (structure erection, wire pulling, access roads, trenching, etc.) and approximately 8.992 acres of permanent disturbance is anticipated for facilities and roadways (unpaved, dirt access roads or spurs and transmission structure pad areas).

Once operational, the Applicant would be restricted to inspection and occasional maintenance and repair of the transmission line. Ground crews would conduct biannual visual inspections of the insulators, overhead grounds, and transmission structure hardware. Additional operations and maintenance activities may include insulator washing (as needed), periodic air inspections (as needed), repair or replacement of lines (as needed), replacement of insulators (as needed), painting tower or pole identification markings or corroded areas (as needed), grading of transmission line access roads (as needed), and response to emergency situations (e.g., outages) to restore power (infrequent/as needed).

No Action Alternative (EA §2.4, page 29): CEQ and Air Force NEPA regulations require inclusion of a No Action Alternative. It serves as a baseline against which the impacts of the Proposed Action and any alternatives can be evaluated. Under the No Action Alternative, the Air Force would not approve an out grant for an easement and the proposed transmission line would not be constructed within Edwards AFB property. Instead, the Applicant would construct a transmission line off base, on privately owned lands connecting the Aratina Solar Project to the existing Holgate Substation located approximately one mile northeast of the solar array. The transmission route would begin on the portion of the Aratina Solar Project located on private land immediately south of SR 58 in proximity to the existing eastbound rest stop located west of the city of Boron. The line would exit the solar facility on the north or eastern boundary and extend approximately 0.4 mile east, generally parallel (and south) of SR 58. The transmission line would then turn north, crossing SR 58, and extend approximately 1/2-mile then turn east for approximately 0.25 mile to connect with the existing Holgate Substation.

ENVIRONMENTAL CONSEQUENCES

This EA tiers from the Final EA for *Proposed Utility Corridors at Edwards Air Force Base, California (Air Force 2016)* (Utility Corridor EA) that was signed by Air Force Materiel Command on October 17, 2016. The Utility Corridor EA was written in order to anticipate future requests from the public or from private enterprise to construct utility lines within the boundaries of Edwards AFB in order to support off-base utilities. The analysis within this EA provides project-specific analysis and the associated site specific environmental impacts with the Proposed Action. Environmental analyses focused on the following resource areas: air quality and greenhouse gases (GHG); cultural and paleontological resources; geology and soils; hazardous materials and hazardous waste; natural resources; and water resources.

Air Quality and Green House Gases (GHGs) (EA §3.1, pages 35 to 41, §4.1, pages 69 to 71): The Proposed Action is partially located in the eastern portion of Kern County and partially located in the western portion of San Bernardino County. The Kern County portion is under the jurisdiction of the Eastern Kern Air Pollution Control District (EKAPCD) while the San Bernardino County portion is under jurisdiction of the Mojave Desert Air Quality Management District (MDAQMD). These two districts are part of the Mojave Desert Air Basin (MDAB). As of December 2020, the United States Environmental Protection Agency (USEPA) listed Eastern Kern County as attainment for all standards except the 8-hour ozone (O₃) and particulate matter less than 10 microns in diameter (PM₁₀) standards, and designated San Bernardino County as attainment for all standards except the 8-hour O₃ and PM₁₀ standard (USEPA 2020a). The USEPA general conformity rule requires a conformity determination for federally sponsored or funded actions in nonattainment or maintenance areas when the net increase in emissions of nonattainment or maintenance pollutants exceeds specified *de minimis* thresholds.

Implementation of the Proposed Action would have minor short- and long-term impacts on air quality. Short-term effects are due to fugitive dust and equipment exhaust generated by heavy equipment during construction. Long-term effects are associated with light, periodic maintenance activities. The sources of construction emissions include combustion of gasoline and diesel fuels by on-road vehicles and off-road equipment as well as fugitive dust from grading and trenching activities. The Air Force's Air Conformity Applicability Model (version 5.0) was used to quantify the potential air pollutant emissions associated with the Proposed Action. Total annual emissions associated with the Proposed Action would not exceed the 25 tons per year *de minimis* rate for volatile organic compounds (VOC) and nitrogen oxides (NO_x) or the 70 tons per year *de minimis* rate for PM₁₀ (EA Table 4-1, page 70). Based on this analyses, the Proposed Action conforms to the State Implementation Plan and a General Conformity determination is not necessary. Even though emission are within *de minimis* levels, the Applicant will be required to comply with all applicable rules and regulations of the EKAPCD and MDAQMD including obtaining applicable permits for construction (e.g. fugitive dust emission permit, etc.). The Applicant will adhere to all requirements and/or limitations as written into these permits and will be the responsible party for any violations that may occur.

The Proposed Action would generate GHG emissions during construction and routine operation and maintenance activities. As shown in EA Table 4-1, the GHGs generated by construction of the Proposed Action are not adverse. Because the operation of the Proposed Action would require only periodic maintenance, with limited use of vehicle and/or equipment, there would be no impact associated with operation. Additionally, construction and operation of new renewable energy facilities would offset GHG emissions, as well as criteria pollutants, including NO_x, VOC, PM^{2.5}, PM¹⁰, and sulfur oxides, by allowing for the replacement and decommissioning of fossil-fueled power plants that generate high levels of GHG emissions and criteria pollutants. Overall, there would be no significant impacts to air quality with implementation of the Proposed Action.

Cultural and Paleontological Resources (EA §3.2, pages 41 to 46, §4.2, pages 73 to 75): The Area of Potential Effect (APE) is comprised of the proposed transmission line within Edwards AFB (gen-tie APE); and the Aratina Solar Project that includes the transmission route to the SCE Holgate Substation both of which are located on private lands outside of Edwards AFB (Aratina Solar Project APE). The cultural resource records search and survey identified one previously unrecorded site and 14 previously recorded cultural resources within the gen-tie APE on Edwards AFB. These sites have been identified as historic trash dumps and recommended as ineligible for listing in the National Register of Historic Places (NRHP). Based on the Cultural Resources Assessment Report (Rincon 2020) found within Appendix E of the Kern County Environmental Impact Report, 60 archaeological sites were found within the Aratina Solar Project APE. Fifty-nine (59) of these sites are considered ineligible for listing on the NRHP. The remaining site was identified as a prehistoric lithic scatter and is potentially eligible for listing on the NRHP. Two potentially NRHP eligible sites were also identified within the SCE Holgate Substation transmission route. The first is a historic period railroad. It appears to be both eligible individually as well as a contributor to an eligible NRHP district. The second is the Twenty Mule Team Road, a California Point of Historical Interest.

Implementation of the transmission line on Edwards AFB would result in four of the 15 sites being disturbed. The Air Force has determined these sites are ineligible for listing in the NRHP. As part of National Historic Preservation Act, the Air Force initiated Section 106 Consultations with the California State Historic Preservation Officer (SHPO) on December 1, 2021 (EA Appendix G). Edwards also initiated consultations with several federally recognized tribes on November 22, 2021 (Chemehuevi Indian Tribe, Colorado River Indian Tribes, Morongo Band of Mission Indians, San Manuel Band of Mission Indians, and Tejon Indian Tribe). Edwards AFB is seeking a concurrence of the APE along with the no effect determination to historic properties of these four sites pursuant to 36 CFR §800.4(d)(1). Consultations with the CA SHPO and the federal recognized tribes are on-going at this time.

Within the Aratina Solar Project APE, the potentially NRHP-eligible site (a prehistoric lithic scatter) can be avoided by project specific mitigation measures (MM) 4.5-1 through 4.5-3 (which require monitoring by both a qualified archaeological and tribal cultural monitor, an archaeologist led Cultural Resources Awareness Training provided to all construction workers, and establishing a 100-foot buffer to avoid the site) as required by the Aratina Solar Project EIR. If implemented, the No Action Alternative would likely result in the construction of the transmission line off Edwards AFB within privately owned lands, connecting to the existing Holgate Substation. The two potentially NRHP-eligible sites (historic period railroad and Twenty Mule Team Road) would not be impacted because avoidance of these sites is proposed as part of the construction of the Aratina Solar Project.

While the archaeological sensitivity of the Edwards APE has been identified as low based on the Proposed Action location and characteristics; there is always a possibility of encountering unanticipated archaeological resources during ground-disturbing activities. The Applicant shall include standard conditions for the treatment of unanticipated discoveries in accordance with both the Archaeological Resources Protection Act and the Native American Graves Protection and Repatriation Act. The Applicant shall immediately report all unanticipated discoveries to the Edwards Cultural Resource Manager (CRM). The Applicant will be required to conduct archaeological monitoring and reporting during ground disturbing activities and provide these reports to the

Edwards CRM. In addition, the Applicant will hire Native American monitors to reduce the likelihood of disturbing or otherwise impacting inadvertent discoveries of cultural resources. The geologic deposits underlying the Edwards transmission corridor (e.g., Quaternary older alluvium) have a high potential to contain paleontological resources. Because the transmission lines will be placed at a depth of 15 to 25 feet, there is a potential paleontological artifacts will be encountered. The Applicant will be required to develop a paleontological resources mitigation plan prior to the commencement of Proposed Action and submit to the Edwards CRM for approval prior to the start of the action. The Applicant will pay for a qualified paleontologist to be on site during ground disturbing activities as well as to conduct a worker environmental awareness training. Any paleontological findings that are discovered shall be reported to the Edwards CRM immediately. With incorporation of these mitigations as identified in Table 4-3 of the EA, there will be no significant impacts cultural resources found within the Edwards transmission line.

Geology and Soils (EA §3.3, pages 46 to 51, §4.3, pages 77 to 79): No earthquake faults or other unstable soils conditions are found within the Proposed Action area; however, the soils have a high potential for soil loss due to wind erosion during construction and very high potential for soil loss due to sheet flow erosion. Approximately 16 acres would be temporarily disturbed as a result of construction activities, with approximately nine acres anticipated to be permanently disturbed. This would result in soil erosion within the Edwards transmission corridor. Prior to final design, the Applicant will prepare a geotechnical engineering and engineering geology study identifying site-specific geologic conditions and potential geologic hazards. The findings and recommendations of the geotechnical engineering and engineering geology study will be addressed and incorporated as part of final engineering design for the Proposed Action. The Applicant's engineer of record shall be responsible for ensuring appropriate recommendations are integrated into final design. To control soils erosion after rain events, a National Pollutant Discharge Elimination System (NPDES) General Permit for construction activities over one acre along with a storm water pollution prevention plan (SWPPP) is required under the Clean Water Act. The Applicant will be responsible for submitting this permit to the Lahontan Regional Water Quality Control Board (Region 6). The Applicant will be able to control any soil erosion by adhering to the terms and conditions of the permit. Based on this analysis, there will be no significant impacts to geology and soils will implementation of the Proposed Action. All final design plans and permits will be submitted to Edwards for their records.

Hazardous Materials and Hazardous Waste (EA §3.4, pages 51 to 53, §4.4, pages 79 to 81): The Proposed Action would involve the use and transport of small quantities of hazardous materials. While the overall risk is relatively low, there is the potential that hazardous materials (e.g., oil, fuels) could spill or leak during construction activity. Because the transmission falls within the precision impact bombing area, there is a potential for unexploded ordnance (UXO) or munitions debris. Signage for an underground natural gas pipelines was observed indicating gas lines pass through the north-south segment of the Proposed Action corridor near Kramer Junction. One monitoring well was observed within the western portion of the Proposed Action. This well is a part of the Edwards AFB Operable Unit 3. Edwards AFB determined no further action is necessary; however, the Applicant will preserve the well during construction and not disturb it. Environmental Restoration Program Site 438 is located in the northeast portion of Edwards AFB along the segment of the corridor that extends north toward the SCE Kramer Substation. Site 438 was suspected of being a disposal site for mustard cans, picric acid, and live fuses based on an archived base map from 1953. During its investigation, the Air Force determined "No Further Investigation" was required and submitted to the Regional Water Quality Control Board, Department of Toxic Substances Control, and USEPA for signature. All parties concurred with this finding on August 16, 2001.

Transmission line construction planning and ground disturbance work would proceed under the consultation and guidance of Edwards AFB. The Applicant will be required to prepare and implement a health and safety plan in compliance with 29 CFR Part 1910.120 addressing all site-specific safety and potential environmental hazards that could be encountered during construction of the Proposed Action, including physical hazards, biological hazards, and general safety hazards. Any training required by construction personnel will be identified within the plan. The health and safety plan will also address UXO, underground natural gas pipelines, and water wells as specifically identified within the Proposed Action corridor. The Applicant shall consult with Edwards AFB Hazardous Waste

Program manager prior to any ground disturbance activities initiated (Dig Permits, IRP monitoring well, etc.). As currently proposed, the Proposed Action would maintain existing infrastructure in-place. Because various leak-identification systems are in-place for natural gas pipelines, it is unlikely that any leakage has occurred. Therefore, the presence of the pipeline is not considered a recognized environmental concern. Overall, there will be no significant impacts the hazardous materials and hazardous wastes from the Proposed Action.

Natural Resources (EA §3.5, pages 53 to 65, §4.5, pages 81 to 86): The Proposed Action lies in an area where several federal and state listed threatened and endangered species may be found. It falls within the designated desert tortoise critical habitat, a federally threatened species. No signs of the desert tortoise or the burrowing owl (California listed species of concern) were detected during wildlife surveys conducted between June 2, 2020 and June 5, 2020. One inactive desert kit fox den was observed (protected fur-bearing mammal under Title 14 of the California Code of Regulations, Section 460)) along with 27 western Joshua trees (a California candidate species). The Mohave ground squirrel, a state threatened species, may also be found throughout the project site. Construction activities (e.g., vegetation removal and grading) associated with the Proposed Action would result in permanent and temporary impacts on suitable desert tortoise habitat. Because the entire corridor is suitable desert tortoise habitat, the Applicant will adhere to the *Biological Opinion (BO) for Operations and Activities at Edwards Air Force Base, California (8-8-14-F-14)* (United States Fish and Wildlife Service [USFWS] 2014). This BO covers utility construction and maintenance activities, which are applicable to the Proposed Action. Pursuant to the procedure specified in the BO, the Air Force has determined the Proposed Action is not likely to adversely affect the desert tortoise or its critical habitat. The Air Force maintains an appropriate record supporting this determination. Additionally, the Applicant has corresponded with the USFWS concerning the Proposed Action. In their response on October 9, 2020, USFWS stated the Air Force could include this activity under its existing biological opinion (EA Appendix G). As required by the BO and stated within Table 4-6 of the EA, the Applicant will adhere to all the terms and conditions some of which include hiring a qualified biologist, as defined by USFWS, to monitor all construction-related activities for the desert tortoise (e.g. checking open excavations 3x per day, reporting sightings of desert tortoises and/or other sensitive species to the Edwards Natural Resources Manager (NRM), conducting preconstruction surveys as well as a worker environmental awareness training and preparing a habitat vegetation restoration plan for approval by the Edwards NRM).

Implementation of the Proposed Action could impact the Mohave ground squirrel, the burrowing owl, and desert kit fox by causing disturbance, injury, or mortality of individuals as a result of becoming trapped within open trenches, being crushed/buried, or being impacted from noise and/or vibration from heavy equipment, increased human presence/activity, and/or vehicle strikes. Potential impacts on raptors and migratory birds include increased noise levels and human use. The Proposed Action would not impact any of the western Joshua tree because the Applicant plans to avoid these trees during construction. While wildlife could be impacted with implementation the Proposed Action, with incorporation of the BO, there would be no significant impacts to biological resources.

Water Resources (EA §3.6, pages 65 to 68, §4.6, pages 90 to 91): Edwards AFB is located in a basin that is essentially closed to both surface drainage and groundwater movement. Most of the precipitation in the region falls in higher elevations, and any resulting storm water flow in ephemeral and/or intermittent streambeds evaporates or infiltrates before it reaches lower elevations. There are no jurisdictional waters or perennial streams within Edwards AFB. The Proposed Action is located outside the 100-year floodplain. Development of the Proposed Action would not result in an increase in groundwater withdrawal at Edwards AFB. The Proposed Action is crossed by several unnamed ephemeral drainages; therefore, construction of the Proposed Action has the potential for increasing sediment due to storm water movement of disturbed sediments within the construction area. As stated within the geology and soils section, the Applicant is required to submit a NPDES General Permit and SWPPP because the action will disturb more than one acre. As part of this permit, the Applicant shall develop a construction storm water pollution prevention plan, which would include implementation of site-specific storm water best management practices to encourage storm water infiltration and reduce storm water runoff during and after construction. In addition the Applicant shall design a storm water management system so storm water discharges do not exceed the 95th percentile storm in adherence with the Energy Independence and Security Act. Under 42 USC §17094, EISA requires federal agencies to establish storm water design requirements for construction projects that disturb a footprint greater than 5,000 ft² of land in order to maintain or restore the property to its pre-development hydrology state. Based on the analysis, impacts to water resource would be insignificant with implementation of the Proposed Action.

PUBLIC REVIEW / INTERAGENCY COORDINATION

A notice of availability was published in the following newspapers: Antelope Valley Press, Bakersfield Californian, Mojave Desert News, Rosamond News, and Tehachapi News on (date) inviting the public to review the draft EA and draft FONSI for a 30-day comment period. Copies were posted to a public website for download and review. Copies of the EA were posted to the State Clearinghouse. Copies were also available at the following libraries: AFTC Technical Library, Edwards Base Library, and Kern County Library – Rosamond/Wanda Kirk Branch. The public comment period closed on (date).

MITIGATION AND MONITORING PLAN

The Applicant, with oversight from the Edwards AFB cultural and natural resource managers, is responsible for ensuring mitigation measures are fully funded, in place, and being carried out as identified above and within Section 4 of the EA. In addition, the Applicant will prepare a Mitigation and Monitoring Plan (MMP) designed to ensure implementation of the mitigation and monitoring requirements. The MMP would be developed within 90 days after FONSI signature and include regulatory permitting requirements along with any best management practices as they become available along with an anticipated mitigation schedule and completion date(s). The Applicant shall submitted the MMP to the Air Force for review and approval. Once approved, the Applicant will report to the Air Force on the status of all their mitigations. In addition, the Applicant's contractor(s) shall adhere to all applicable permitting and best management practices in accordance with federal, state, and/or local regulatory requirements during implementation of the Proposed Action. The MMP is a living document and as such the Applicant shall review and update as needed throughout the life with final approval of each update made by the Air Force.

FINDING OF NO SIGNIFICANT IMPACT

Based on my review of the facts and analyses summarized above and presented in the EA, I find the proposed decision to approve issuing an out grant for a 100-foot wide transmission line easement to a private sector applicant in order for them to construct, operate, and maintain an approximately 6.5 mile-long electrical transmission line across a portion of Edwards AFB will not have a significant impact on the natural or human environment. An environmental impact statement is therefore not required. This analysis fulfills the requirements of NEPA, the President’s CEQ 40 CFR Parts 1500 – 1508, the Air Force regulation 32 CFR Part 989 and Interim CEQ Guidance (2021). The mitigation measures contained in the EA shall be incorporated into the easement and be binding conditions of the out grant.

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Date

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