

DRAFT FINDING OF NO SIGNIFICANT IMPACT
PROGRAMMATIC ENVIRONMENTAL ASSESSMENT FOR THE
2020 INTEGRATED NATURAL RESOURCE MANAGEMENT PLAN
EDWARDS AIR FORCE BASE, CALIFORNIA

The DAF is aware of the November 12, 2024 decision in Marin Audubon Society v. Federal Aviation Administration, No. 23-1067 (D.C. Cir. Nov. 12, 2024). To the extent that a court may conclude that the Council on Environmental Quality (CEQ) regulations implementing NEPA are not judicially enforceable or binding on this agency action, the DAF has nonetheless elected to follow the regulations of NEPA as amended by the Fiscal Responsibility Act of 2023 (Public Law 118-5), in addition to the DAF's procedures/regulations implementing NEPA at 32 CFR 989, to meet the agency's obligations under NEPA, 42 U.S.C. §§ 4321 et seq.

Pursuant to provisions of the National Environmental Policy Act (NEPA), Title 42 United States Code (USC) Sections 4321 to 4347, as amended by the Fiscal Responsibility Act of 2023 (Public Law 118-5), and 32 CFR § 989, Environmental Impact Analysis Process, the U.S. Department of the Air Force (Air Force) assessed the potential environmental consequences associated with implementing projects and component plans identified in the 2020–2025 Edwards Air Force Base (AFB) Integrated Natural Resources Management Plan (INRMP) and the Annual Work Plan update, covering fiscal years 2020–2032 (hereafter referred to as the “2020 INRMP and component plans”) at Edwards AFB located within Los Angeles, Kern, and San Bernardino Counties, California.

The Air Force prepared a Programmatic Environmental Assessment (PEA) as it related to the Edwards 2020 INRMP, for which judicial review was made available, and component plans. A PEA entails analyzing all or some of the environmental effects associated with a policy, program, plan, or group of related actions in order to focus on relevant program decisions that are timed to coincide with meaningful points in Air Force planning and decision making. The Air Force may rely on the analysis included in the PEA in a subsequent environmental documentation for related actions as follows:

- 1) Within 5 years and without additional review of the analysis in the programmatic environmental document unless there are substantial new circumstances or information about the significance of adverse effects that bear on the analysis.
- 2) After 5 years, so long as the agency reevaluates the analysis in the programmatic environmental document and any underlying assumption to ensure reliance on the analysis remains valid.

The purpose of this PEA is to address and analyze the natural resource management projects and component plans outlined in the INRMP. The overall strategy of the INRMP is to sustain and enhance the natural environment or ecosystem at Edwards AFB using an adaptive management process while integrating the Natural Resources Program with the military mission.

Implementation of the 2020 INRMP is needed to comply with environmental laws, regulations, and policies including the Sikes Act; Department of Defense Instruction (DoDI) 4715.03, *Natural Resources Conservation Program*; and Air Force Manual (AFMAN) 32-7003, *Environmental Conservation*. The 2020 INRMP supports the military mission; conserves and protects the installation's natural resources; allows multipurpose use of natural resources; provides for public access to natural resources; and builds upon relationships established with federal, state, and local agencies, federally recognized tribes,

nonprofit organizations, and the general public. The 2020 INRMP emphasizes a continued ecosystem management approach using adaptive management techniques in concert with the Air Force mission. The INRMP is also consistent with other installation plans, specifically the Edwards AFB Installation Development Plan (412 TW 2017) and future Installation Development Plans.

The PEA, incorporated by reference into this finding, analyzes the potential environmental consequences of activities associated with implementing the 2020 INRMP and component plans, and provides environmental protection measures to avoid or reduce adverse environmental impacts.

The PEA considers all potential impacts of Alternative A (No Action Alternative), Alternative B (Low-Level Management Alternative), and Alternative C (High-Level Management Alternative). The PEA also considers cumulative environmental impacts with other projects at Edwards AFB and within the surrounding Antelope Valley.

ALTERNATIVE A (No Action Alternative)

The No Action Alternative provides a comparative benchmark that enables the reader to compare the magnitude of environmental effects against the action alternatives. The No Action Alternative includes activities that comply with legal requirements regarding natural resources and represents a compliance driven level of ecosystem management. Because these activities are legally required, they will be carried out whether this PEA is implemented or not; therefore, these activities comprise the No Action Alternative. All projects will undergo the Air Force Environmental Impact Analysis Process (EIAP) prior to implementation.

This alternative uses management practices within Branch Memorial Park, the Piute Ponds Complex, and base-wide to:

1. Maintain current habitat conditions and diversity of native plant and animal populations.
2. Provide for the sustainable multipurpose use of the installation's natural resources to include hunting, fishing, trapping, and non-consumptive recreational uses.
3. Maintain or provide for an increase in a federally listed threatened or endangered species population or the protection, maintenance, enhancement, or restoration of its habitat (e.g., Mojave desert tortoise [*Gopherus agassizii*]).
4. Provide legally required environmental and natural resources awareness training for installation newcomers and contractors.
5. Detect, respond to, and control populations of invasive species that impact Air Force testing and training operations, and where control measures have the greatest opportunity to restore a self-sustaining native ecosystem.
6. Restrict the introduction of exotic species into the natural ecosystems on base.
7. Maintain current hydrologic processes across the landscape.

ALTERNATIVE B (Low-Level Management Alternative)

Under the Low-Level Management Alternative, Edwards AFB will implement natural resource activities beyond those that are legally required. This alternative is an enhancement of the No Action Alternative, where the activities taking place enhance or improve natural resources across Edwards AFB. If this alternative is selected, Edwards AFB would also continue to implement activities included within the No Action Alternative. All projects would undergo the Air Force EIAP prior to implementation.

This alternative would use management practices within Branch Memorial Park, the Piute Ponds Complex, and base-wide to:

1. Continue maintaining plus enhance current habitat conditions and provide ecosystem improvements to create diversity of native plant and animal populations.
2. Physically improve the natural habitat (e.g., through vegetation management) for the multipurpose use of natural resources to include hunting, fishing, trapping, and non-consumptive recreational uses.
3. Continue maintaining or providing for federally listed species populations and their habitat plus provide for the protection and conservation of plants and animals that are proposed, candidate, or under review for federal listing (e.g., Joshua tree [*Yucca brevifolia* var. *brevifolia*], western pond turtle [*Actinemys marmorata*]).
4. Continue all legally required environmental and natural resources awareness training plus add awareness training for installation newcomers and contractors.
5. Expand detection, response, and control of invasive species populations not only within the Edwards test/training areas but also in areas across the Edwards landscape where control measures have the greatest opportunity to restore a self-sustaining native ecosystem.
6. Restrict the introduction of exotic species into improved and semi-improved grounds in addition to continuing to restrict exotic species introductions into natural ecosystems.
7. Improve hydrological processes across the landscape in addition to continued maintenance.

ALTERNATIVE C (High-Level Management Alternative)

Under the High-Level Management Alternative, Edwards AFB would implement activities based on ecosystem management principles that restore the natural environment or ecosystem and improve or enhance man-made or improved/semi-improved areas. This alternative is another enhancement from the No Action and Low-Level Management Alternatives. If this alternative is selected, Edwards AFB would also implement activities under the No Action and Low-Level Management Alternatives. All projects will undergo the Air Force EIAP prior to implementation.

This alternative includes activities within Branch Memorial Park, the Piute Ponds Complex, and base-wide to:

1. Continue maintaining current habitat conditions, enhancing current habitat conditions, and providing ecosystem improvements, plus restore current or previously disturbed habitat to resemble surrounding habitat conditions and diversity of native plant and animal populations.
2. Provide constructed features (e.g., fishing pier, portable restrooms, parking spots) and interpretive signage for the multipurpose use of natural resources to include hunting, fishing, trapping, and non-consumptive recreational uses.
3. Continue providing for the federally listed and federal candidate/proposed/under review species plus provide for the protection and conservation of state listed protected species when practical and consistent with the military mission (e.g., tricolored blackbird [*Agelaius tricolor*], Mohave ground squirrel [*Xerospermophilus mohavensis*]).
4. Continue legally required training and training for installation newcomers and contractors plus provide programs and events to heighten public awareness of natural resources conservation.
5. Expand detection, response, and control of invasive species populations to across the entire Edwards landscape.
6. Remove exotic species from the natural ecosystem and improved and semi-improved grounds.

7. Maintain and improve hydrological processes in man-made wetlands in addition to continued maintenance and improvements to hydrological processes across the landscape.
8. Provide for the reintroduction of a native federally listed species.

AGENCY AND PUBLIC COMMENT

Since activities under review in this PEA would include activities within floodplains and wetlands, early public notice of the PEA was announced per requirements of Executive Order (EO) 11988, *Floodplain Management*, and EO 11990, *Protection of Wetlands*. The early public notice was published in the Mojave Desert News on 13 March 2024 and on the Environmental page (<https://www.edwards.af.mil/About/Environment/>) of Edwards AFB website on 15 March 2024. No public comments were received. Stakeholder agencies and tribes were also given an opportunity to provide early comments through a scoping package sent on 4 March 2024. Agency and stakeholder comments are summarized within [Appendix B: Early Public Notice and Early Stakeholder Scoping](#) of the Final PEA.

Relevant federal and state agencies, tribes, and other stakeholders were sent a correspondence package to notify them about the availability of the Draft PEA. These stakeholders include:

- Bureau of Land Management
- U.S. Fish and Wildlife Service (USFWS)
- California Department of Fish and Wildlife
- San Manuel Band of Mission Indians
- Colorado River Indian Tribes
- Chemehuevi Indian Tribe
- Morongo Band of Mission Indians
- Tejon Indian Tribe

A Notice of Availability (NOA) of the Draft PEA was published in the newspapers of record (listed below). The NOA announced the availability of the PEA for review and invited the public to provide comments. The publication of the NOA initiated the 30-day public review period. The NOA, stakeholder letters, and comments received from the public, relevant federal and state agencies, tribes, and other stakeholders will be included in [Appendix D: Notice of Availability, Stakeholder Engagement, and Comments Received](#) of the Final PEA.

- The Mojave Desert News, located in California City, CA
- Antelope Valley Press, located in Palmdale, CA

The Draft PEA was made available at the following local libraries and website:

- AFRL Technical Library, Edwards AFB, CA 93524
- AFTC Technical Library, 812 TSS/ENTL, Edwards AFB, CA 93524
- Boron Branch Library, 26967 Twenty Mule Team Road, Boron, CA 93516
- Edwards Base Library, Building 2665, 5 West Yeager Blvd, Edwards AFB, CA 93524
- Mojave Branch Library, 15555 O Street, Mojave, CA 93501
- Wanda Kirk Branch Library, 3611 Rosamond Blvd, Rosamond, CA 93560
- Edwards AFB website at <https://www.edwards.af.mil/About/Environment/>

SUMMARY OF FINDINGS

The analyses of the affected environment and environmental consequences of implementing the Proposed Action presented in the PEA concluded that by implementing standard environmental protection and minimization measures (see [Section 5.0](#)) no significant adverse effects would result.

The Air Force has concluded that no significant adverse effects would result to the following resources as a result of the Proposed Action: Air quality; water resources, including surface water, wetlands, and floodplains; soils and geological resources; cultural resources; biological resources, including wildlife, vegetation, invasive species, special status species, and sensitive habitats; noise; public health and safety; and recreation. No significant adverse cumulative impacts would result from activities associated with Alternative A (No Action Alternative), Alternative B (Low-Level Management Alternative) or Alternative C (High-Level Management Alternative) when considered with past, present, or reasonably foreseeable future projects at Edwards AFB and within the surrounding Antelope Valley. In addition, the PEA concluded that the action alternatives would not affect air space, groundwater, hazardous materials and waste, infrastructure, land use, seismicity, socioeconomics, and topography.

Air Quality (PEA Section 3.2): Estimated emissions were modeled for the High-Level Management Alternative projects detailed in this PEA. No criteria pollutant emissions exceed the National Ambient Air Quality Standards (NAAQS) or California Environmental Quality Act (CEQA) Significance Thresholds.

The proposed management actions will comply with all applicable federal, state, and local laws and regulations, and a General Conformity Determination for the three alternatives is not applicable. Compliance with the minimization measures listed in [Appendix C](#) will further reduce anticipated effects due to criteria pollutant or ozone precursor pollutant air emissions. Therefore, no significant adverse effects are expected.

Hazardous Air Pollutant (HAP) emissions would be short-term, occurring only during ground-disturbing activities. It is anticipated that the construction equipment would be in compliance with all applicable California Diesel Regulations for off-road and on-road vehicles, which are aimed at reducing diesel particulate as well as nitrogen oxides (NO_x) emissions, by requiring the use of cleaner engines. Compliance with all Clean Air Act (CAA) Title III, HAP requirements or more stringent state or local requirements, as they apply to stationary sources that emit HAPs, would also be required. No adverse HAP-related impacts are expected from the proposed activities.

Water Resources (PEA Section 3.3): Short-term, negligible to minor, and site-specific impacts to water resources could be expected as a result of activities that may be implemented under the No Action, Low-Level, or High-Level Management alternatives assessed in this PEA. These potential impacts would be a result of invasive species and vegetation management projects that may cause ground disturbance or use prescribed burns or herbicides as management techniques. Standard minimization measures (see [Appendix C](#) in the PEA) would be implemented, as needed, and the Edwards AFB's Installation Pest Management Plan, Invasive Species Management Plan, and Wildland Fire Management Plan would be adhered to for all projects to minimize potential effects.

Edwards AFB is located at the lowest point in the 2,400-square-mile Antelope Valley watershed. In an Approved Jurisdictional Determination dated 07 June 2013, the U.S. Army Corps of Engineers concluded that, apart from Lake Palmdale and its tributaries, there are no waters of the U.S. within Clean Water Act (CWA) jurisdiction within the Antelope Valley watershed. Edwards AFB is located within the Antelope Valley watershed; therefore, it contains no waters of the U.S. Although no wetlands on Edwards AFB meet the criteria of jurisdictional wetlands under the CWA, there are wetlands that are managed according to AFMAN 32-7003, Chapter 3, Section 3C. Wetlands, as defined by EO 11990, *Protection of Wetlands*, are areas "inundated by surface or ground water with a frequency sufficient to support and, under normal

circumstances, do or would support a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction.” Aquatic habitats that meet this definition include Branch Memorial Park Pond and the Piute Ponds Complex.

Some invasive species or vegetation management projects could occur within 100-year floodplain designated areas or wetlands defined under EO 11990. Because only a portion of the potential invasive species management projects that may be implemented could occur within designated floodplains or wetlands and because areas where invasive species or vegetation are removed would be revegetated with native species in the long-term, any impacts to the floodplain and wetlands would be short-term, site-specific, and negligible.

Overall, execution of projects with the potential to impact water resources would be dependent on year-to-year project funding. Once projects are funded and site-specific proposals are provided, the Air Force EIAP would be completed to determine specific project impacts. Implementation of minimization measures and adherence to base specific management plans would reduce the expected negligible to minor negative impacts; therefore, there would be no significant impacts to water resources as a result of the No Action, Low-Level, or High-Level Management Alternatives.

Soils and Geological Resources (PEA Section 3.4): Impacts to soils and geological resources from ground disturbance under the No Action, Low-Level, and High-Level Management Alternatives are expected to be primarily short-term, negligible, and site-specific. Most soil disturbance would be caused by invasive species or vegetation management projects.

Implementation of vegetation/invasive species management projects may occur anywhere across Edwards AFB; however, these impacts are not expected to cascade outside of the general vicinity of project areas. Although there is the potential for long-term impacts, it is unlikely that all implemented projects would cause long-term disturbance. Most impacts would occur on the surface or at a shallow depth of the soil and would not significantly alter soil or geological resources. Additionally, many projects would occur within previously disturbed or developed areas and would result in long-term, positive impacts to soil resources.

Implementation of Minimization Measures 3.1 and 5.3 described in [Appendix C](#) of the PEA would add additional protection for soils under all natural resources management projects and limit negative effects. Considering these measures and the nature of the potential impacts, no significant impacts to soils and geological resources are expected as a result of the No Action, Low-Level, or High-Level Management Alternatives.

Cultural Resources (PEA Section 3.5): Impacts to cultural resources from the No Action, Low-Level, and High-Level Management Alternatives would be expected to be short-term, occur at the site-specific level, and not exceed negligible to moderate levels. Impacts to cultural resources from project activities would come from ground disturbance and visual impacts. Standard minimization measures requiring coordination with the Cultural Resources Manager (CRM), use of a cultural resources monitor, ceasing project activities if artifacts or bones are discovered, and completion of cultural resources awareness education program would be implemented as needed to reduce impacts to cultural resources and help avoid the possibility of negative effects. Further consultation would be conducted under Section 106 of the National Historic Preservation Act if projects have the potential to impact any sites that were recommended eligible for listing in the National Register of Historic Places.

The potential for impacts to cultural resources from all activities would be dependent on year-to-year project funding. Once projects are funded and site-specific proposals are provided, the Air Force EIAP would be completed to determine specific project level impacts. Implementation of minimization measures ([Appendix C](#) of the PEA) would reduce the expected negligible to moderate risks and help to

avoid negative effects; therefore, there would be no significant impacts to cultural resources as a result of the No Action, Low-Level, or High-Level Management Alternatives.

Biological Resources (PEA Section 3.6): Under the No Action Low-Level, and High-Level Management Alternatives, impacts to biological resources would be both negative and positive and would not result in meaningful impacts. Most negative impacts would be short-term and specific to the project location. Long-term, activities would have a positive impact on biological resources as many of the projects are designed to remove invasive species, improve native habitat, monitor special status species and their habitat, and other activities that require short-term disturbance in order to achieve long-term goals. Associated, resource-specific management plans would be adhered to when performing applicable activities. The USFWS would be consulted as needed if project activities would potentially affect federally listed species. Minimization measures, especially those under heading number 5 in [Appendix C](#), would be implemented to further reduce impacts to biological resources.

The potential positive and negative impacts to biological resources from all activities would be dependent on year-to-year project funding. Once projects are funded and site-specific proposals are provided, the Air Force EIAP would be completed to determine specific project level impacts. Negative effects to biological resources would be expected to be short-term, site-specific, and not exceed minor levels of intensity. Impacts from activities/projects that could be implemented under the No Action, Low-Level, and High-Level Management Alternatives are expected to be largely positive and beneficial long-term; therefore, there would be no significant impacts to biological resources.

Noise (PEA Section 3.7): Noise impacts from activities that may take place under the No Action, Low-Level, or High-Level Management Alternatives would primarily result from the use of noise-emitting heavy equipment, hand equipment, outdoor maintenance vehicles (e.g., lawn mowers), and on road and off-road vehicles. The use of these loud equipment types and vehicles would be minor compared to day-to-day noise levels at Edwards AFB and would result in only site-specific impacts. Use of these vehicles/equipment would be short-term and cease at project completion. Additional minor noise impacts from hunting activities may occur, these impacts would be short-term, site specific, and only occur at certain times of year.

The annual level of noise impacts from all activities would be dependent on year-to-year funding but would not exceed short-term minor impacts. Once projects are funded and site-specific proposals are provided, the Air Force EIAP would be completed to determine specific project level impacts. Standard minimization measures ([Appendix C](#) of the PEA) would be implemented to protect workers and surrounding areas if noise levels on projects are deemed higher than acceptable levels; therefore, there would be no significant impacts to noise as a result of the No Action, Low-Level, or High-Level Management Alternatives.

Public Health and Safety (PEA Section 3.8): Potential impacts to public health and safety from activities that may be implemented under the No Action, Low-Level, or High Level Management Alternatives include negligible local risks from herbicide application, minor site-specific risks from soil contamination and digging, minor risks from potentially dangerous wildlife, and minor to moderate site-specific to local risks of unexploded ordinance encounters when projects are implemented in certain areas of the installation. Additional short-term, minor, negative impacts from prescribed fire use for vegetation management may be encountered. Positive impacts to public health from implementation of certain projects may also occur.

The risk to public health and safety from all activities would be dependent on year-to-year project funding. Once projects are funded and site-specific proposals are provided, the Air Force EIAP would be completed to determine specific project level impacts. Risks to public health and safety would be

expected to be short-term and not exceed negligible to moderate levels of risk. All risks would be minimized with minimization measures, as described in [Appendix C](#) in the PEA; therefore, there would be no significant impacts to noise as a result of the No Action, Low-Level, or High-Level Management Alternatives.

Recreation (PEA Section 3.9): Negative impacts to recreation under the No Action, Low-Level, and High-Level Management Alternatives could result from management activities that cause short-term disturbance and noise. These negative impacts may temporarily reduce the quality of the recreational experience at Branch Memorial Park and the Piute Ponds Complex; however, these disturbances would be negligible to minor and would not result in long-term negative impacts. Specific to the Piute Ponds Complex, certain habitat maintenance activities may result in temporary closures of small portions of the Complex; however, closures would only occur during certain times of year. Most potential impacts to recreation would be positive, resulting from projects that enhance and maintain recreation areas.

The potential positive and negative impacts to recreation would be dependent on year-to-year project funding. Once projects are funded and site-specific proposals are provided, the Air Force EIAP would be completed to determine specific project level impacts. Negative effects to recreation would be expected to be short-term and not exceed minor levels of intensity. These already minor impacts would be minimized further with the measures listed in [Appendix C](#) in the PEA.

FINDING OF NO PRACTICABLE ALTERNATIVE

Per 32 CFR §989.14(g), this PEA is subject to the requirements and objectives of EO 11988, *Floodplain Management*, and EO 11990, *Protection of Wetlands*, because certain actions that could be implemented under this PEA are located within the 100-year floodplain or wetlands. Actions within designated floodplain areas or wetlands that could be implemented include water management, vegetation management, invasive species management, habitat management, recreation complex management, ecological restoration, and routine maintenance projects.

Because these management actions are needed to maintain ecological and recreational functionality and/or to maintain Air Force testing and training operations, there is no ability to relocate such projects and no alternative to implementing these actions in the 100-year floodplain or wetlands when there is a need for them to occur there; therefore, I find that there is no practicable alternative to implementing certain actions under the considered alternatives that are within Federal Emergency Management Agency (FEMA) delineated 100-year floodplains or wetlands at Edwards AFB.

FINDING OF NO SIGNIFICANT IMPACT

Based on my review of the facts and analyses contained in the attached PEA, conducted under the provisions of NEPA, CEQ regulations, and 32 CFR Part 989, I conclude that implementing projects within the 2020 INRMP and component plans would not have a significant environmental impact, either by themselves or cumulatively with other projects at Edwards AFB. Accordingly, an Environmental Impact Statement is not required. The signing of this Finding of No Significant Impact completes the environmental impact analysis process.

Date _____

RONALD J. ONDERKO, P.E. NH-04, DAF

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