

FINAL
ENVIRONMENTAL ASSESSMENT FOR
MULTIPLE CONSTRUCTION PROJECTS

SATCOM, CAMP ROBERTS
SAN LUIS OBISPO COUNTY, CALIFORNIA

United States Army

December 2015

**FINAL ENVIRONMENTAL ASSESSMENT AND FINDING OF
NO SIGNIFICANT IMPACT FOR
MULTIPLE CONSTRUCTION PROJECTS, SATCOM,
CAMP ROBERTS, SAN LUIS OBISPO COUNTY, CALIFORNIA**

December 2015

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Multiple Construction Projects at SATCOM Environmental Assessment

FINAL FINDING OF NO SIGNIFICANT IMPACT

This finding of no significant impact (FONSI) has been prepared pursuant to the National Environmental Policy Act (NEPA) of 1969, Public Law 91-190, 42 U.S. Code §4321 et seq.; the Council on Environmental Quality regulations for implementing NEPA, 40 Code of Federal Regulations (CFR), Parts 1500–1508; and Environmental Analysis of Army Actions, 32 CFR 651 (March 2002). The FONSI is the decision document for the attached Environmental Assessment (EA) for implementation of four construction projects at the Camp Roberts Satellite Communications (SATCOM) site (proposed action).

DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

The proposed action consists of: 1) the SATCOM expansion to the south for construction of a Naval Research Lab (NRL) antenna pad and security fence, 2) a parking lot along Perimeter Road for the Network Enterprise Technology Command/9th Army Signal Command (NETCOM), 3) a discharge system for the cooling towers that provide cooling for Building 18000, and 4) a Modernization of Enterprise Terminals (MET) site future expansion for NETCOM. The proposed action is needed to facilitate long-term growth and expansion of the SATCOM facility to respond to new technologies and accommodate additional communications needs associated with an enhanced mission definition and modernized equipment systems.

The NRL project would include an antenna pad, access roads, security fence, and utility lines on about 4.6 acres just south of the existing SATCOM site. The parking lot would include about 40 parking spots on less than 1 acre to the south of the existing SATCOM access gate. The discharge system would consist of an infiltration gallery on less than 0.5 acre where wastewater from two cooling towers that provide cooling for Building 18000 is currently discharged to land southwest of the SATCOM site. The MET site would be established to install two or three antennas and associated infrastructure on about 3.8 acres west of the SATCOM site and south of another MET antenna site.

The no-action alternative would continue current operations and would not allow the U.S. Army to fulfill its objective to facilitate long-term growth and expansion of the SATCOM facility. Other alternatives to the proposed action were considered, but eliminated from detailed evaluation due to satellite obscuration issues, increased environmental impacts, and feasibility.

SUMMARY OF ENVIRONMENTAL CONSEQUENCES

The EA documents that the proposed action would not have any significant direct, indirect, or cumulative impacts on the human environment. After an initial examination of all resource areas, it has been determined that the proposed action would have no or insignificant effects on agricultural resources, environmental justice, geology, population and housing, public services, recreation, and socioeconomics. Upon further analysis, it was determined that the proposed action would have less than significant effects on cultural resources, hazards and hazardous materials, infrastructure, land use, noise, transportation, and visual resources. Additionally, it was determined that the proposed action would have less than significant effects on air quality, biological resources, soils, and water resources, with implementation of the measures incorporated into the proposed action and the mitigation measures identified in this EA.

CONCLUSION

Based on the environmental analyses contained in the EA, it has been found and determined that implementation of the proposed action, with implementation of mitigation measures, would not have any significant direct, indirect, or cumulative impacts on the human environment (which includes the physical and natural environment and the relationship of people with those environments). Because no significant impacts would result from implementing the proposed action, an environmental impact statement is not required and will not be prepared.

APPROVAL



Paul W. Fellingner
Colonel, U.S. Army
Garrison Commander
Presidio of Monterey

28 Jan 16
Date

EXECUTIVE SUMMARY

The United States Department of Army (U.S. Army) has prepared an Environmental Assessment (EA) to evaluate the environmental effects of implementing four construction projects at the Satellite Communications (SATCOM) site at Camp Roberts in support of the Naval Research Lab (NRL) and U.S. Army Network Enterprise Technology Command/9th Army Signal Command (NETCOM) operations. The U.S. Army owns Camp Roberts, which is licensed to and managed by the California Army National Guard. Within the boundary of Camp Roberts is SATCOM, an 81-acre property managed by the U.S. Army Garrison (USAG) Presidio of Monterey (POM) where the U.S. Army maintains operational control. The four construction projects include two antenna sites, associated infrastructure, a parking lot, and a wastewater discharge system. The EA was prepared using existing information from previous EAs prepared for other projects at the SATCOM site in combination with field surveys and supplemental research. The previous EAs are incorporated by reference in the EA where applicable. The EA has been prepared pursuant to the National Environmental Policy Act (NEPA) of 1969, 42 United States Code (USC) §4321 et seq., and the Council on Environmental Quality (CEQ) regulations for implementing NEPA, 40 Code of Federal Regulations (CFR), Parts 1500–1508.

SUMMARY OF THE PROPOSED ACTION AND ALTERNATIVES

The proposed action consists of: 1) the SATCOM expansion to the south for construction of an NRL antenna pad and security fence, 2) a parking lot along Perimeter Road for NETCOM, 3) a discharge system for the cooling towers that provide cooling for Building 18000, and 4) a Modernization of Enterprise Terminals (MET) site future expansion for NETCOM. The proposed action is needed to facilitate long-term growth and expansion of the SATCOM facility to respond to new technologies and accommodate additional communications needs associated with an enhanced mission definition and modernized equipment systems.

The NRL project would include an antenna pad, access roads, security fence, and utility lines on about 4.6 acres just south of the existing SATCOM site. The parking lot would include about 40 parking spots on less than 1 acre to the south of the existing SATCOM access gate. The discharge system would consist of an infiltration gallery on less than 0.5 acre where wastewater from two cooling towers that provide cooling for Building 18000 is currently discharged to land southwest of the SATCOM site. The MET site would be established to install two or three antennas and associated infrastructure on about 3.8 acres west of the SATCOM site and south of another MET antenna site.

The no-action alternative would continue current operations and would not allow the U.S. Army to fulfill its objective to facilitate long-term growth and expansion of the SATCOM facility. Other alternatives to the proposed action were considered, but eliminated from detailed evaluation due to satellite obscuration issues, increased environmental impacts, and feasibility.

SUMMARY OF ENVIRONMENTAL CONSEQUENCES

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Table ES-1 summarizes the environmental consequences of the proposed action and no-action alternative based on the analysis presented in Chapter 3.0, Environmental Conditions and Consequences, of the EA, and identifies avoidance, minimization and mitigation measures associated with each resource area. Measures are identified as:

- Avoidance and Minimization Measures: required to fulfill agency consultation requirements, permit conditions, installation plan commitments, and/or Best Management Practices (BMPs).
- Mitigation Measures: required to reduce significant adverse effects of the proposed action that would otherwise require a higher level of NEPA analysis, to less than significant.

In addition to the measures listed in Table ES-1, the following measures have been incorporated into the proposed action to avoid or minimize adverse effects:

- Relevant measures in the Camp Roberts Integrated Natural Resources Management Plan (INRMP) (e.g., standard operating procedures, erosion control, water pollution prevention, protecting sensitive species, preserving grassland and oak woodland communities, and oak tree replacement policies); the Camp Roberts Integrated Cultural Resources Management Plan (ICRMP) (e.g., standard operating procedures to protect cultural resources, guidance for inadvertent discoveries of paleontological resources); the POM INRMP (e.g., natural resources protection guidance); and the POM ICRMP (e.g., standard operating procedures to protect cultural resources, guidance for inadvertent discoveries of cultural resources or

human remains) will be implemented as they apply to the proposed action and at the discretion of the USAG POM.

Table ES-1. Summary of Environmental Consequences

<i>Resource Topic</i>	<i>Proposed Action</i>		<i>No-Action</i>
	<i>Impacts</i>	<i>Avoidance, Minimization, and Mitigation Measures</i>	
Air Quality	<p>-Less than significant with mitigation.</p> <ul style="list-style-type: none"> ▪ Construction activities for each project would emit pollutants, including GHGs and fugitive dust, but contribute minimally to regional air quality conditions. ▪ Construction activities for each project would be less than <i>de minimis</i> thresholds. ▪ Operational emissions would be minimal from electricity use, additional vehicle trips, and vehicles used during security patrols or maintenance. 	<p>Air Measures 1 through 6 will be implemented per agency consultation requirements, permit conditions, installation management plans, and/or BMPs.</p> <p>Air Measure 7 is a required mitigation.</p> <hr/> <ul style="list-style-type: none"> ▪ Air Measure 1: Minimize disturbance – Minimize the area disturbed due to clearing, earthmoving, or excavation activities. The contractor(s) or builder(s) shall designate a person or persons to monitor the fugitive dust emissions and enhance the implementation of all air quality measures as necessary to minimize dust complaints and reduce visible emissions below 20 percent opacity. Their duties shall include holidays and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the Air Pollution Control District Compliance Division prior to the start of any grading, earthwork, or demolition. ▪ Air Measure 2: Water disturbed areas – Sufficiently water all excavated or graded areas to prevent excessive dust generation and increase watering frequency when wind speeds exceed 15 miles per hour. Use water trucks or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site. Reclaimed (non-potable) water should be used whenever possible. To the extent feasible, APCD-approved dust suppressants (see San Luis Obispo County Air Pollution Control District 2012) should be used to reduce the amount of water used for fugitive dust control. ▪ Air Measure 3: Limit vehicle speeds – Limit construction vehicle speeds to 15 miles per hour on unpaved surfaces at the construction site. ▪ Air Measure 4: Control dust – Water or chemically treat all unpaved active portions of the construction site as necessary to 	<p>No change in air quality from existing setting.</p>

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		<p>control windblown dust and dust generated by vehicle traffic. All dirt stockpile areas should be sprayed daily as needed. Install wheel washers where vehicles enter and exit unpaved roads onto streets, or wash off trucks and equipment leaving the site. All roadways, driveways, sidewalks, etc. to be paved should be completed as soon as possible. Sweep streets at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers with reclaimed water should be used where feasible:</p> <ul style="list-style-type: none"> ▪ Air Measure 5: Revegetate disturbed areas – Implement native species revegetation and landscape plans as soon as possible following completion of soil disturbing activities. Exposed ground areas that are planned to be reworked at dates greater than one month after initial grading should be sown with a fast germinating, non-invasive, grass seed and watered until vegetation is established. All disturbed soil areas not subject to revegetation should be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the Air Pollution Control District. ▪ Air Measure 6; Protect Truck Loads – Ensure that trucks hauling dirt, sand, soil, or other loose materials are covered or maintain at least two feet of freeboard (minimum vertical distance between the top of the load and the top of the trailer) in accordance with California Vehicle Code Section 23114. ▪ Air Measure 7: Naturally Occurring Asbestos – Prior to construction activities, an evaluation for naturally occurring asbestos in the soils/geological units where ground disturbance is proposed will be conducted. If the area is exempt from the regulation, an exemption request will be filed with the APCD. If the site is not exempt, all requirements of the Asbestos Air Toxics Control Measure will be followed. 	

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Resource Topic	Proposed Action		No-Action
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Biological Resources	<p>Project 1: SATCOM Expansion to South for NRL Antenna</p> <p>-Less than significant with mitigation.</p> <ul style="list-style-type: none"> ▪ Oak woodlands and annual grasslands would be removed on up to 4.6 acres, which could introduce or spread invasive plant species, remove special-status plants and affect special-status wildlife and nesting or roosting migratory birds. ▪ Up to 30 oak trees may need to be removed. ▪ Construction activities could disturb or injure the federally listed San Joaquin kit fox or vernal pool fairy shrimp. ▪ Lighting could affect nocturnal wildlife movement and behavior patterns. ▪ Operation-related effects would be minimal and similar to current conditions. <p>Project 2: NETCOM Parking Lot along Perimeter Road</p> <p>-Less than significant.</p> <ul style="list-style-type: none"> ▪ Minimal herbaceous vegetation removal is needed, and no impacts to special-status plants are expected. ▪ No construction-related impacts to vernal pool fairy shrimp or San Joaquin kit fox are expected. 	<p>Bio Measure 1 is a required mitigation.</p> <p>Bio Measures 2 through 9 will be implemented per agency consultation requirements, permit conditions, installation management plans, and/or BMPs.</p> <hr/> <ul style="list-style-type: none"> ▪ Bio Measure 1: Avoid, minimize, and mitigate impacts on blue oak woodland and native trees (extracted from Bio Measure 1 in the 2013 EA) – In accordance with the INRMP for Camp Roberts (California Army National Guard 2001), the following measures will be implemented for the four construction projects to avoid and minimize impacts on native trees that may be affected during construction activities and replace native trees that must be removed or are significantly damaged in the project areas: <ul style="list-style-type: none"> ○ A tree survey will be conducted by an International Society of Arboriculture-certified arborist prior to final design to document the locations of native trees regulated by the Camp Roberts native tree replacement policy. The survey will encompass areas of potential ground disturbance associated with the four projects and adjacent areas where trees may be subject to damage from the ground disturbance. The information will be used during final design to assist in the design and siting of facilities and infrastructure and provide a count of trees that would be subject to the replacement policy. During the design and construction phases, project elements will be located to minimize impacts to native trees. ○ During construction activities, no ground disturbance, soil compaction, staging, or vehicle access will be allowed within the dripline of any native trees within project areas and outside the clear zones, unless authorized by the USAG POM. Protective fencing at the dripline (the furthest point 	<p>No change in biological conditions from existing setting.</p>

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	<ul style="list-style-type: none"> ▪ Operational and traffic impacts could disturb wildlife, but would be similar to current conditions. ▪ Lighting could affect nocturnal wildlife movement and behavior patterns. <p>Project 3: Discharge System for Cooling Towers -Less than significant.</p> <ul style="list-style-type: none"> ▪ Minimal vegetation removal is needed, and no impacts to special-status plants are expected. ▪ Construction activities could disturb or injure the federally listed San Joaquin kit fox or vernal pool fairy shrimp. ▪ A water source would no longer be available. ▪ Operation-related effects would be minimal and similar to current conditions. <p>Project 4: NETCOM MET Site Future Expansion Area -Less than significant with mitigation.</p> <ul style="list-style-type: none"> ▪ Similar impacts as Project 1 above. ▪ Oak woodlands and annual grasslands would be removed on up to 3.8 acres, and up to 20 trees may need to be removed. 	<p>from the tree that is covered by the tree crown) will be used to protect native trees with diameters larger than 1 inch or heights of 2 inches or greater, regardless of diameter, during construction activities.</p> <ul style="list-style-type: none"> ○ Fasteners will not be allowed on any trees that are protected in place. ○ Excavation or trenches that must be placed within a dripline will be hand-dug, augured, or bored. Major roots (2 inches or greater) shall be avoided whenever feasible. If roots cannot be avoided, all roots larger than 1 inch shall be cut clean. ○ When pruning of native trees or cutting of roots larger than 2 inches in diameter is required, it must be done by an International Society of Arboriculture-certified arborist and in accordance with American National Standards Institute standards for arboriculture operations. ○ Direct removal of or significant damage to standing native trees (those with diameters larger than 1 inch or heights of at least 2 feet, regardless of diameter) will be subject to the native tree replacement policy, which includes the following: <p>Any native tree (valley oak, blue oak, coast live oak, sycamore, willow, Fremont cottonwood, box elder, big leaf maple, black walnut, or pine) removed will be replaced by planting the same species at a 3:1 ratio (three new trees for every one tree removed) with a monitoring program. Replacement trees shall be one to five gallon (or equivalent) container stock and planted in an area not subject to future activities that would damage or remove them. They will be planted at appropriate densities on the SATCOM property or in areas approved by California Army National Guard. Future plantings may be subject to subsequent NEPA compliance.</p>	

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		<p>Replacement trees will be watered at a frequency to ensure survival.</p> <p>Plantings should occur during the appropriate season (e.g., container stock should be planted early on in the rainy season) within 1 year of tree removal.</p> <p>Replacement plantings will be monitored for survival for a period of 3 years.</p> <p>If a 3:1 survivorship ratio (i.e., three surviving trees for each tree removed) is not attained by the end of each year, sufficient numbers of additional trees will be planted and monitored for an additional 3 years until the desired success ratio is attained.</p> <p>As part of the monitoring program, the project proponent will provide an annual monitoring report describing the actions taken, the number of trees planted, and the number of trees remaining alive at the end of the season.</p> <ul style="list-style-type: none"> ○ Leave standing dead trees (snags) and fallen logs (coarse woody debris) when they are not safety hazards. Snags and coarse woody debris serve several important ecological functions. They provide structural habitat characteristics for various plant and animal species, are potentially important in long-term nutrient cycling, and help minimize effects, caused by erosion, to soil and water resources. ▪ Bio Measure 2: Maintain access for San Joaquin kit fox through the security fence around the NRL antenna site (extracted from Bio Measure 2 in the 2013 EA) – Approximately 36 acres of suitable San Joaquin kit fox habitat would potentially be lost between the existing SATCOM fence and the proposed security fence around the NRL antenna site. To minimize the loss of this habitat, 6-inch diameter holes would be placed in the fence at ground level at ridge tops and valley areas where kit foxes are most likely to be moving. Holes would be placed in the new (extended) perimeter fence as well 	

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		<p>as the existing perimeter fence. These holes would allow kit foxes and other small animals to pass through the facility or utilize habitat within the facility and also escape if they become trapped inside of the fence.</p> <ul style="list-style-type: none"> ▪ Bio Measure 3: Implement avoidance and minimization measures to protect San Joaquin kit fox and other special-status species that occupy burrows (slightly modified from Bio Measure 3 in the 2013 EA) – The following measures would be implemented, as applicable, to avoid and minimize the potential for injury and mortality of San Joaquin kit fox. These measures were derived from the USFWS informal consultation concurrence letter dated 17 August 2015 and the <i>Biological Opinion for Normal Operations and Construction Activities in Support of the Satellite Communications Facility at Camp Roberts, San Luis Obispo, California</i> (1-8-96-F-25), with slight modifications to improve the effectiveness of the measures. Modifications include clarification of the survey area, the timing for preactivity surveys, the qualified biologist requirements, and the guidance to follow for establishing exclusion zones; inclusion of additional requirements for minimizing and avoiding disturbance to dens; and expansion of the worker awareness training requirement. The four construction projects will comply with the Biological Opinion, as updated or amended. <ul style="list-style-type: none"> ○ Conduct preactivity surveys for the presence of kit fox and other special-status animals that may occupy burrows in the project area (e.g., western burrowing owl, American badger) no less than 14 days and no more than 30 days prior to ground-disturbing activities. Surveys will be conducted by qualified biologists in the clear zone and a 150-foot-wide buffer on both sides of the clear zone. The intent of 	

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		<p>the surveys is to identify active burrows that are used by special-status animals.</p> <ul style="list-style-type: none"> ○ Exclusion zones, or no-disturbance buffers, will be established around dens and active burrows found within the survey area in accordance with the latest guidance from USFWS or CDFW (e.g., Standard Recommendations for Protection of the San Joaquin Kit Fox Prior to or During Ground Disturbance, USFWS 2011; Burrowing Owl Survey Protocol and Mitigation Guidelines, California Burrowing Owl Consortium 1993). No ground disturbance or vehicle traffic is allowed within the exclusion zones. If an established roadway falls within the exclusion zone, vehicle traffic shall be allowed only if critical need exists and alternate routes are not available. Foot traffic will be allowed for transit only when necessary and alternate routes are not available. If a natal or pupping den is encountered, USFWS will be notified immediately. Exclusion zones for kit fox will be based on the following criteria: <p>Potential or atypical den - 50-foot (15-meter) radius Known den - 100-foot (30-meter) radius Known natal or pupping den - 200-foot (60-meter) radius</p> <ul style="list-style-type: none"> ○ Potential dens are defined as dens with entrances of sufficient size to allow use by San Joaquin kit foxes (6-inch or greater diameter) and that occur in suitable habitat. Known dens are those that are currently inhabited by kit foxes or where kit foxes have been observed in the past. Known natal or pupping dens are those dens where pregnant females or females with pups have been observed. The exclusion radius is measured from the center of a single den, or from the center of a group of dens. 	

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		<ul style="list-style-type: none"> ○ Only qualified biologists will conduct preactivity den surveys and other activities that pertain to San Joaquin kit fox. The names and credentials of qualified biologists will be supplied to USFWS for its review and approval at least 30 days prior to the onset of activities that they are authorized to conduct. ○ Exclusion zones will be clearly staked, encircled with cord or tape, and flagged. Exclusion zones will be established by a qualified biologist. ○ Disturbance to all potential San Joaquin kit fox dens will be avoided to the maximum extent possible. If a kit fox den is discovered within the project area or within 200 feet of the project boundary, work will stop. The den shall not be disturbed. The USAG POM will be notified immediately. USAG POM will immediately notify the USFWS. USAG POM will coordinate with the USFWS to determine how to proceed. ○ Potential kit fox den minimization measures could include the following. In the event that the destruction of a potential den is determined by USAG POM and the USFWS, a biologist qualified to conduct preactivity surveys may only destroy a den after appropriate monitoring; coordination with and approval from the USFWS; and all efforts to avoid den destruction by modifying construction activities have been exhausted. If approved by USFWS, a potential den will be carefully excavated with hand tools by a qualified biologist or under the direction of a qualified biologist before construction begins. If at any point during excavation a San Joaquin kit fox is discovered inside the den, the excavation activity will cease immediately and the USFWS will be notified immediately for further guidance. Destruction of the den may resume when, in the judgment 	

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		<p>of the qualified biologist and at the direction from the USFWS, the animal has escaped from the partially destroyed den. The den will be fully excavated and then filled with dirt and compacted to ensure that kit foxes cannot reenter or use the den during the construction period. Destruction of identified dens may require minimization measures such as installation of replacement dens, as directed by USFWS.</p> <ul style="list-style-type: none"> ○ Construction activities shall be designed to minimize off-road vehicle traffic and be limited to the smallest possible areas of disturbance. Construction personnel should make use of existing roads, trails, and previously disturbed areas whenever possible. Off-road parking and staging areas should be clearly delineated. ○ All vehicle traffic is subject to a 25 mile per hour speed limit, except where posted lower. Nighttime construction activities will be avoided. ○ To avoid accidental entrapment of animals, the following measures will be implemented: <p>All steep-sided excavations greater than 2-feet deep shall be equipped with one or more earth or plank escape ramps.</p> <p>All excavations will be thoroughly inspected for animals prior to sealing or refilling to avoid accidental burial. Permanent and semi-permanent structures installed in-ground or underground shall be constructed so that animals may not become trapped within.</p> <p>Any pipe, culvert, or similar material with an inside diameter of 4 inches or more shall be thoroughly inspected for animals prior to sealing or reconnection. If animals are found inside the materials, the material will not be removed, or moved only once to remove it from the path of construction activity, until the animals vacate the area.</p>	

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		<p>Pipelines temporarily left open in place shall be covered or blocked until work is completed.</p> <ul style="list-style-type: none"> ○ Contour and restoration of disturbed areas shall be performed following conclusion of construction activities. All temporary excavations shall be filled in, contoured, and vegetated where practicable to restore as closely as possible the existing conditions of the site. Permanent and semi-permanent construction will be blended into the surrounding landscape and vegetated where practicable. Local native plant species will be used whenever possible. ○ All trash, especially food-related items, will be deposited in closed containers or bags and regularly moved from the site. ○ Use of pest control substance, such as rodenticides and herbicides, will be in strict accordance with all Federal, State, local, and Army regulations. In the event that kit foxes are sighted or an active den exists within a 1-mile radius of the SATCOM facility, the Army will use methods of rodent control that have little or no toxicity to kit foxes, such as zinc phosphide or live-trapping, to the maximum extent practicable, particularly during the pupping season from January 1 to April 30. Aluminum phosphide (phostoxin) should be used only in ground holes where ground squirrels are observed using the target holes. ○ All construction crews associated with the proposed action will receive environmental awareness training from a qualified biologist before construction begins. The training will include information on all special-status species that may occur in the project area, their habitat, and the need to protect them. Specifically for San Joaquin kit fox, information on its life history, habitat requirements, and photographs of the species will be provided. A fact sheet 	

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		<p>conveying this information will be prepared for distribution to all contractors, their employees, and military and agency personnel involved in construction.</p> <ul style="list-style-type: none"> ○ To prevent harassment and mortality of listed species by dogs or cats, pets will not be permitted at the SATCOM site or Camp Roberts at any time. Dogs are only allowed at Camp Roberts if they are used for sheep herding or upland game hunting and must be on post and under strict voice command at all times. <ul style="list-style-type: none"> ▪ Bio Measure 4: Minimize injury and mortality of San Joaquin kit fox from traffic on East Perimeter Road (extracted from Bio Measure 4 in the 2013 EA) – Traffic levels on East Perimeter Road associated with the SATCOM facility are expected to decrease over the 20-year ADP planning period. While the threat of vehicle strikes along East Perimeter Road will decrease, SATCOM personnel will continue to take measures to avoid and minimize the potential for injury and mortality of kit foxes. The following measures will be implemented as part of the proposed action: SATCOM personnel and contractors working at the facility will be educated regarding the need to adhere to the posted speed limits and to slow or stop vehicles when in proximity to animals near roads. ▪ Bio Measure 5: Avoid potential impacts on vernal pool fairy shrimp (extracted from Bio Measure 5 in the 2013 EA) – In accordance with the <i>Programmatic Biological Opinion for Multiple Activities at Camp Roberts, San Luis Obispo and Monterey Counties, California (1-8-08-F-24)</i> and Camp Roberts INRMP (California Army National Guard 2001), the following measures will be implemented for Project 1, 3, and 4: <ul style="list-style-type: none"> ○ <u>Provide Education to Contractors and SATCOM Staff:</u> Measures implemented to reduce the risk of harming 	

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<i>Resource Topic</i>	<i>Proposed Action</i>		<i>No-Action</i>
	<i>Impacts</i>	<i>Avoidance, Minimization, and Mitigation Measures</i>	
		<p>protected species include training by a qualified biologist for all personnel at SATCOM about the presence of threatened and/or endangered species and the Camp Roberts environmental protection measures. Information will continue to be conveyed to contractors and SATCOM employees prior to project initiation. In addition, a pamphlet on vernal pool fairy shrimp will be available and distributed at the SATCOM facility. The flyer or pamphlet will include a brief description, representative photographs, and legal status of vernal pool fairy shrimp; a description of vernal pool fairy shrimp habitat; the Camp Roberts environmental protection measures for this species including avoiding the placement of obstacles in vernal pool fairy shrimp habitat; and the penalties for not complying with the protection measures. This pamphlet could be combined with information regarding other federally listed species at Camp Roberts.</p> <ul style="list-style-type: none"> ○ <u>Avoid Ground-Disturbing Activities Associated with Training, Maintenance, and Construction during the Wet-Season</u>: To the maximum extent feasible, ground-disturbing training, maintenance, and construction activities will be avoided during the wet season, typically November 1 through April 30. Avoiding ground disturbance during this time period will minimize disturbance, degradation, and destruction of vernal pool fairy shrimp habitat and will minimize the injury and mortality of vernal pool fairy shrimp during their growing and reproductive phase. ○ <u>Avoid Cross-County Travel, Especially during the Wet-Season</u>: All military personnel and visitors will be advised to stay on established roads and trails, consistent with CA REG 350-1. Cross-country travel, especially during the wet season, typically November 1 through April 30, will be 	

Table ES-1. Summary of Environmental Consequences

<i>Resource Topic</i>	<i>Proposed Action</i>		<i>No-Action</i>
	<i>Impacts</i>	<i>Avoidance, Minimization, and Mitigation Measures</i>	
		<p>avoided. This information will be provided to contractors and SATCOM employees during all environmental briefings and will be included in the pamphlet discussed above.</p> <ul style="list-style-type: none"> ○ <u>Conduct Preactivity Survey for Vernal Pool Fairy Shrimp and its Habitat</u>: A qualified biologist will conduct preactivity surveys prior to any activities that involve grading, excavation, or the stock piling of dirt or materials (any new construction) to determine the potential for the activity to affect vernal pool fairy shrimp. The project area and an appropriate buffer zone will be surveyed. The survey results will be documented in a report that includes a map of the project area showing the location of sensitive species sites and recommendations for avoidance. If vernal pool fairy shrimp are found during surveys and affects to the species or habitat cannot be avoided, work will stop and the POM will re-initiate coordination with the USFWS. The U.S. Army will ensure that all workers and equipment operators are informed of the results and areas to be avoided. Areas to be avoided will be flagged; flagged sites and exclusion zones are off limits to personnel and equipment. Only the qualified biologist will be able to remove flags and exclusion zones after completion of the project. ○ <u>Contour and restoration of disturbed areas shall be performed following the conclusion of project or activity</u>. All temporary excavation shall be filled in, contoured, and vegetated where practicable to restore as closely as possible the existing condition of the site. ○ ▪ Bio Measure 6: Prevent the spread of invasive plants (extracted from Bio Measure 6 in the 2013 EA) – To prevent 	

Table ES-1. Summary of Environmental Consequences

<i>Resource Topic</i>	<i>Proposed Action</i>		<i>No-Action</i>
	<i>Impacts</i>	<i>Avoidance, Minimization, and Mitigation Measures</i>	
		<p>the introduction or spread of invasive plants in the project area, the following measures will be implemented during construction activities for each project:</p> <ul style="list-style-type: none"> ○ Educate construction personnel and managers on the importance of controlling and preventing the spread of invasive weeds. This can be addressed during an environmental orientation/briefing that all personnel should get prior to conducting any work at the SATCOM facility. ○ Wash construction vehicles and equipment off-site before entering the project area, including prior to re-entry if vehicles or equipment leave the project area prior to the end of the construction period. ○ Use erosion control materials (e.g., straw wattles) that are certified weed-free. ○ Restore temporarily disturbed grassland areas with annual and perennial grasses that are native to the Camp Roberts region. <ul style="list-style-type: none"> ▪ Bio Measure 7: Conduct preactivity survey for special-status plants (extracted from Bio Measure 7 in the 2013 EA) – A preactivity survey will be conducted by a qualified botanist for the special-status plants listed in Section 3.4.1 in this EA. The survey will be conducted in suitable habitat at each individual project area prior to ground disturbing activities and preferably during the blooming period of the species prior to construction, which may require multiple visits between March and August to cover each species’ blooming period. If the survey cannot be conducted during the blooming period, the botanist shall use the survey to identify areas where the species are most likely to occur and conduct a site-specific assessment to determine suitability of the habitat for each species. If populations or individuals of any special-status species are identified during the survey or are highly suspected to occur in the project area, the 	

Table ES-1. Summary of Environmental Consequences

<i>Resource Topic</i>	<i>Proposed Action</i>		<i>No-Action</i>
	<i>Impacts</i>	<i>Avoidance, Minimization, and Mitigation Measures</i>	
		<p>U.S. Army will coordinate with the USFWS or CDFW to determine appropriate avoidance or minimization measures. Such measures may include relocating facilities or realigning the clear zone or work area to avoid the plant(s) or transplanting plant(s) to suitable habitat elsewhere at Camp Roberts (if determined feasible). For the federally listed purple amole, measures identified in the Programmatic Biological Opinion for Multiple Activities at Camp Roberts, San Luis Obispo and Monterey Counties, California (1-8-08-F-24) will apply if the plant is identified or highly suspected to occur in the project area based on the preactivity survey.</p> <ul style="list-style-type: none"> ▪ Bio Measure 8: Conduct a preactivity survey for nesting migratory birds and roosting bats (extracted from Bio Measure 8 in the 2013 EA) – A preactivity survey will be conducted by a qualified wildlife biologist for nesting birds and roosting bats prior to each project. The nesting bird survey will be necessary if construction activities are scheduled during the nesting period (February through September); the roosting bat survey is necessary regardless of the construction schedule. The survey will be conducted within 10 days prior to any tree removal activities or the start of construction activities that could disturb nesting birds or roosting bats, whichever is scheduled first. The survey will be repeated if no activity takes place for more than 10 days at a time. The survey area will encompass the project area and a 500-foot buffer on either side of the project areas. All habitat within the survey area will be assessed to identify active bird nests, including identification of the species nesting, and active bat roost sites. Surveys for bats should include visual inspection to identify potential suitable bat roosting habitat in trees slated for removal followed by daytime visual assessments and evening visual searches of emerging and free flying bats. For golden eagles, the survey will be conducted in accordance with the guidelines in the Interim Golden Eagle 	

Table ES-1. Summary of Environmental Consequences

<i>Resource Topic</i>	<i>Proposed Action</i>		<i>No-Action</i>
	<i>Impacts</i>	<i>Avoidance, Minimization, and Mitigation Measures</i>	
		<p>Inventory and Monitoring Protocols; and Other Recommendations (Pagel et al. 2010), and if golden eagle nests may be disturbed, incidental take authorization under the Bald and Golden Eagle Protection Act (50 CFR Section 22.26) will be requested from the USFWS. If no active nests or roost sites are detected during the survey, no additional measures are necessary.</p> <p>If an active nest or roost site is found in any tree scheduled for removal, tree removal will not commence until the nest is determined to be no longer active or the roost site is properly evacuated, as described below. Trees should be removed outside of the nesting season for birds (February through September) to avoid removal of active nests and outside of the breeding season for bats (April to September) to avoid disturbance to maternal colonies.</p> <ul style="list-style-type: none"> ○ The preferred procedure is to cut down or break up potential roost trees/snags/stumps one half hour after sunset when bats are likely to have emerged for the evening. ○ If potential roost trees/snags/stumps must be removed during the day, they should be cut down on warm days in late morning to afternoon when any bats present are likely to be warm. ○ Prior to tree removal, create noise and vibration disturbance on the tree (e.g., concussive hitting with equipment and/or chainsaw cutting) for at least 15 minutes before carefully opening up potential crevices and cavities for inspection and clearance. ○ If bats may be in a tree hole or heavy branch cavity, attempt to expose them to allow them to escape. For example, if the cavity cannot be investigated by a biologist, then carefully cut successive sections above the cavity to open it, waiting 	

Table ES-1. Summary of Environmental Consequences

Resource Topic	Proposed Action		No-Action
	Impacts	Avoidance, Minimization, and Mitigation Measures	
		<p>up to 10 minutes in between each cut, and determine if it is empty or allow any bats inside to crawl or fly out.</p> <ul style="list-style-type: none"> ○ If bats may be in branches that can be removed from the tree and set aside, cut the branches off intact and set them upright against trees away from the construction area to allow any bats present to passively escape. <p>If an active nest or roost site is found in the survey area outside a tree scheduled for removal, a no-disturbance buffer will be established around the site to avoid disturbance or destruction until the end of the bird breeding season (September 30) or until a qualified wildlife biologist determines that the young have fledged and left the nest (this date varies by species) or that the roost site is no longer active. The extent of the buffer will be determined by the biologist in coordination with USFWS or CDFW and will depend on the level of noise or construction disturbance anticipated near the site, the line-of-sight between the nest and the disturbance, and the presence of topographical or artificial barriers. Suitable buffer distances may vary between species. If an active roost site is identified in or immediately adjacent to the work area, the biologist may, upon authorization from USFWS or CDFW, establish a one-way barrier at the opening to allow the bats to leave the roost during nighttime hours, but not return to the site. This may be appropriate for trees that must be removed in the clear zone to allow the tree to be removed after the bats have left on their own accord.</p> <ul style="list-style-type: none"> ▪ Bio Measure 9: Design nighttime lighting to minimize illumination – All nighttime lighting needed for any of the projects will be designed in accordance with Camp Roberts lighting policies and with consideration for minimizing illuminated areas. To the extent possible, perimeter and other high intensity security lighting should be shielded to avoid spill over lighting to adjacent areas (per Matrix Design Group 2013). 	

Table ES-1. Summary of Environmental Consequences

<i>Resource Topic</i>	<i>Proposed Action</i>		<i>No-Action</i>
	<i>Impacts</i>	<i>Avoidance, Minimization, and Mitigation Measures</i>	
		<p>The following design measures should be considered to minimize lighting impacts on bats (from Bat Conservation Trust 2009):</p> <ul style="list-style-type: none"> ○ Do not direct light toward known bat roosts to avoid directly illuminating the roosts. ○ Use lights with less than 2,000 lumens (150 Watts) to minimize disturbance to bats and other wildlife. ○ Use a low pressure sodium lamp or high pressure sodium lamp with glass glazing to minimize ultraviolet lighting, which attracts insects. ○ Use hoods, cowls, louvres, or shields to direct light to the intended area only and avoid light spillage. ○ To the extent possible, use shorter lighting columns or direct light from taller columns downward at a more acute angle to reduce horizontal spill. ○ To the extent possible, use movement sensors or timers to minimize the amount of time the lights are on at night. 	
Cultural Resources	<p>-Less than significant.</p> <ul style="list-style-type: none"> ▪ Potential for damage to buried, previously undiscovered cultural resources during ground-disturbing activities for each project. ▪ No impacts on historic properties. 	<p>Cultural Measure 1 will be implemented per agency consultation requirements, permit conditions, installation management plans, and/or BMPs.</p> <hr/> <ul style="list-style-type: none"> ▪ Cultural Measure 1: Monitor ground disturbance – A Native American advisor/consultant will be present during ground-disturbing activities associated with the proposed action, in response to requests from the Santa Ynez Band of Chumash Indians during consultations on the proposed action and other projects at the SATCOM site. Additional measures may be identified during consultation with the Santa Ynez Band of Chumash Indians in the event of an inadvertent discovery of cultural resources during construction activities. 	No impacts to cultural resources.

Table ES-1. Summary of Environmental Consequences

<i>Resource Topic</i>	<i>Proposed Action</i>		<i>No-Action</i>
	<i>Impacts</i>	<i>Avoidance, Minimization, and Mitigation Measures</i>	
Hazards and Hazardous Materials	<p>-Less than significant.</p> <ul style="list-style-type: none"> ▪ Hazardous materials could be released into the environment through leaks and/or spills during implementation of each project. ▪ A fire could accidentally be ignited during construction activities for each project. ▪ Operational safety hazards could result from the new electrical lines, hill instability where antennas are installed, and pedestrians crossing Perimeter Road. 	<p>Haz Measure 1 through 3 will be implemented per agency consultation requirements, permit conditions, installation management plans, and/or BMPs.</p> <hr/> <p>Implement hazard and hazardous materials measures derived from the 2005 ADP EA:</p> <ul style="list-style-type: none"> ▪ Haz Measure 1: Prevent and clean up spills – Lids shall be affixed to all containers containing hazardous materials to prevent spilling of hazardous wastes. Accidental spills of hazardous material would be cleaned up immediately. ▪ Haz Measure 2: Utilize spark arrests on construction equipment and prohibit smoking in the construction area – To avoid and minimize the potential for fires, construction equipment shall be equipped with spark arresters maintained in effective working order, unless the engine is constructed, equipped, and maintained for the prevention of fire pursuant to Public Resources Code Section 4443. In addition, the construction contractor should prohibit smoking in the project area during construction to reduce the chance of igniting a fire that could damage biological resources and structures at the SATCOM site. ▪ Haz Measure 3: Provide training on unexploded ordnance – Construction personnel working in areas where unexploded ordnance may be present should receive training on identifying unexploded ordnance and the appropriate response if such material is found during the course of construction. 	No change in hazards from existing setting.
Infrastructure	<p>-Less than significant.</p> <ul style="list-style-type: none"> ▪ Temporary disruptions to existing service lines and traffic delays may occur during construction activities for each project. 	No measures necessary.	No change in infrastructure from existing setting, but limited facilities to support expanded

Table ES-1. Summary of Environmental Consequences

<i>Resource Topic</i>	<i>Proposed Action</i>		<i>No-Action</i>
	<i>Impacts</i>	<i>Avoidance, Minimization, and Mitigation Measures</i>	
	<ul style="list-style-type: none"> ▪ Overall improvement to communications and other infrastructure at the SATCOM site. 		operations at the SATCOM site.
Land Use	<p>Project 1: SATCOM Expansion to South for NRL Antenna -Less than significant.</p> <ul style="list-style-type: none"> ▪ Temporary land use-related disruptions during construction activities. ▪ Conversion of up to 4.6 acres from open space to antenna facilities, access roads, and a security fence to the south of the existing SATCOM facility. <p>Project 2: NETCOM Parking Lot along Perimeter Road -Less than significant.</p> <ul style="list-style-type: none"> ▪ Temporary land use-related disruptions during construction activities. ▪ No change from current use. <p>Project 3: Discharge System for Cooling Towers -Less than significant.</p> <ul style="list-style-type: none"> ▪ Temporary land use-related disruptions during construction activities. ▪ No change from current use, but improved conditions at the discharge location. 	No measures necessary.	No change in land uses from existing setting, but limited facilities to support expanded operations at the SATCOM site.

Table ES-1. Summary of Environmental Consequences

<i>Resource Topic</i>	<i>Proposed Action</i>		<i>No-Action</i>
	<i>Impacts</i>	<i>Avoidance, Minimization, and Mitigation Measures</i>	
	<p>Project 4: NETCOM MET Site Future Expansion Area -Less than significant.</p> <ul style="list-style-type: none"> ▪ Similar impacts as Project 1 above. ▪ Conversion of up to 3.8 acres from open space to antenna facilities to the west of the existing SATCOM facility. 		
Noise	<p>-Less than significant.</p> <ul style="list-style-type: none"> ▪ Increased noise during construction activities for each project could be noticeable to SATCOM personnel and others near the work area. ▪ Construction-related noise would not affect other sensitive receptors. ▪ Operational noise for all of the projects would be similar to existing noise generated by the SATCOM facility. 	<p>Noise measures 1 through 2 will be implemented per agency consultation requirements, permit conditions, installation management plans, and/or BMPs.</p> <p>_____</p> <p>Implement noise measures, as modified from the 2010 EA:</p> <ul style="list-style-type: none"> ▪ Noise Measure 1. Provide earplugs if necessary – If necessary or requested, earplugs should be provided by the U.S. Army to SATCOM personnel that work outside near the work area to avoid exposure to excessive sound during construction. ▪ Noise Measure 2. Limit construction hours – Construction should take place Monday through Friday between 0700 and 1700 hours to the extent practicable while also considering disruptions that may occur during the day (e.g. service line disruptions, access and parking). 	No change in noise levels from existing setting.
Soil Resources	<p>Project 1: SATCOM Expansion to South for NRL Antenna -Less than significant with mitigation.</p> <ul style="list-style-type: none"> ▪ Soil disturbance on up to 4.6 acres could expose soils to wind and water erosion. ▪ Cut and fill would be necessary to establish the antenna site and clear zone 	<p>Geo Measures 1 through 2 and Water Measure 1 will be implemented per agency consultation requirements, permit conditions, installation management plans, and/or BMPs. Geo Measures 3 and 4 are required mitigations.</p> <p>_____</p> <p>Implement geology measures derived from the 2005 ADP EA and the 2013 Anti-Terrorism Force Protection Measures EA, as well as Water Measure 1:</p>	No change in soil or topographic conditions from existing setting.

Table ES-1. Summary of Environmental Consequences

<i>Resource Topic</i>	<i>Proposed Action</i>		<i>No-Action</i>
	<i>Impacts</i>	<i>Avoidance, Minimization, and Mitigation Measures</i>	
	<p>along the fence, but they would be balanced in the project area.</p> <ul style="list-style-type: none"> ▪ Steep slopes and shrink-swell soils could affect design of the antenna facility. <p>Project 2: NETCOM Parking Lot along Perimeter Road</p> <ul style="list-style-type: none"> ▪ Soil disturbance on less than 1 acre in a previously disturbed area would have a low potential for erosion-related impacts. ▪ The new parking surface would reduce the potential for soil erosion over the long term. <p>Project 3: Discharge System for Cooling Towers</p> <ul style="list-style-type: none"> ▪ Soil disturbance on about 0.5 acre could expose soils to wind and water erosion. ▪ The new discharge system would greatly reduce soil erosion at the discharge location. <p>Project 4: NETCOM MET Site Future Expansion Area</p> <ul style="list-style-type: none"> ▪ Similar impacts as Project 1 above, only on up to 3.8 acres. 	<ul style="list-style-type: none"> ▪ Geo Measure 1: Clearing procedures – To the extent possible, the temporary working area should be limited to the minimum area necessary for construction activities. Topsoil should be removed and stockpiled for use during site restoration. In sensitive areas, construction equipment should be used that minimizes surface disturbance, soil compaction, and loss of topsoil. Such equipment includes low ground pressure tracks or tires, blade shoes, and brush rake attachments. Steep, erodible slopes should not be pre-cleared until construction activities are to be carried out on these slopes immediately thereafter. ▪ Geo Measure 2: Backfilling, trenching, and grading activities – General and site-specific measures should be implemented to minimize the effects of grading, trenching, and backfilling; to enhance rehabilitation; and to minimize erosion. These measures include the following: <ul style="list-style-type: none"> ○ graded areas should be the minimum size required for construction activities; ○ the time between trenching and backfilling should be minimized; ○ backfilling should commence immediately after lowering-in; and ○ after final grading, all compacted areas should be lightly disked or raked before reseeding. <p>After the completion of backfilling, all disturbed areas (including the permanent easement, temporary workspace, temporary access roads, and stockpile sites) should be restored to approximately the original grade. Any excessively steep cuts that are unstable should be graded back to an acceptable slope or retaining walls installed. Topsoil stockpiled during initial site excavation should be spread over freshly graded areas.</p>	

Table ES-1. Summary of Environmental Consequences

<i>Resource Topic</i>	<i>Proposed Action</i>		<i>No-Action</i>
	<i>Impacts</i>	<i>Avoidance, Minimization, and Mitigation Measures</i>	
		<p>Trench backfill should be compacted by driving tracked or rubber-tired equipment over the trench. Because compaction should still be incomplete, a roach (or crown) should be left over the trench. It should be feathered on either side to blend the trench with adjacent areas.</p> <ul style="list-style-type: none"> ▪ Geo Measure 3: Revegetation – Revegetation will be undertaken on any disturbed areas to provide stabilization through erosion control and will comply with Camp Roberts policies. The area should be immediately reseeded with a native plant species seed mix that is similar in structure and composition to preconstruction conditions. The seed mix used for revegetation will be identified in coordination with Camp Roberts biologists. ▪ Geo Measure 4: Procedures for steep slopes – Several areas of steep slopes (greater than 15 percent slope) are located in the project area. For soils on these slopes, the following measures will be implemented: <ul style="list-style-type: none"> ○ employ erosion control techniques previously listed; ○ replace topsoil, leaving the seedbed rough and fertilized appropriately; and ○ use mulch or erosion control matting to protect the seed and seedbed from wind and water erosion. ▪ Implement Water Measure 1 	
Transportation	<p>-Less than significant</p> <ul style="list-style-type: none"> ▪ Minimal increases in traffic during construction activities for each project. ▪ Temporary traffic delays possible on roads in project area during construction activities for each project. 	No measures necessary.	No change in access or traffic from existing setting.

Table ES-1. Summary of Environmental Consequences

<i>Resource Topic</i>	<i>Proposed Action</i>		<i>No-Action</i>
	<i>Impacts</i>	<i>Avoidance, Minimization, and Mitigation Measures</i>	
	<ul style="list-style-type: none"> ▪ Temporary closure of the parking lot during improvements. ▪ Slight increase in operational traffic over existing conditions. 		
Visual Resources	<p>-Less than significant</p> <ul style="list-style-type: none"> ▪ Temporary visual impacts during construction activities for each project. ▪ Long-term change in visual setting with new facilities, but they would be visually similar to existing facilities at the SATCOM site. ▪ No change to public views of the SATCOM site. 	No measures necessary.	No change in visual environment from existing setting.
Water Resources	<p>Project 1: SATCOM Expansion to South for NRL Antenna</p> <p>-Less than significant with mitigation.</p> <ul style="list-style-type: none"> ▪ Construction activities on up to 4.6 acres could discharge sediment and pollutants into surface waters. ▪ Establishment of the antenna site and clear zone could alter runoff patterns. ▪ Increase in up to 1.5 acres of impermeable surface. <p>Project 2: NETCOM Parking Lot along Perimeter Road</p> <p>-Less than significant.</p>	<p>Water Measure 1, Geo Measures 1 & 2, and Haz Measure 1 will be implemented per agency consultation requirements, permit conditions, installation management plans, and/or BMPs.</p> <p>Geo Measures 3 & 4 are required mitigations.</p> <hr/> <ul style="list-style-type: none"> ▪ Water Measure 1: Implement a stormwater pollution prevention plan for activities that disturb 1 acre or more of land – Because construction activities for the NRL antenna site and security fence and MET antenna site expansion would affect more than 1 acre, the U.S. Army or construction contractor(s) will be required to obtain coverage under the <i>General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2010-0014-DWQ)</i> by filing permit registration documents, including a Notice of Intent, stormwater pollution prevention plan (SWPPP), and other compliance related documents. The SWPPP is designed to manage stormwater associated with construction activities and 	No change in runoff or water quality from existing setting. Ongoing issues with cooling tower discharge would continue.

Table ES-1. Summary of Environmental Consequences

<i>Resource Topic</i>	<i>Proposed Action</i>		<i>No-Action</i>
	<i>Impacts</i>	<i>Avoidance, Minimization, and Mitigation Measures</i>	
	<ul style="list-style-type: none"> ▪ Disturbance on less than 1 acre would have minimal potential impacts on water quality. ▪ Increase in less than 1 acre of semi-impermeable surface. <p>Project 3: Discharge System for Cooling Towers</p> <p>-Less than significant.</p> <ul style="list-style-type: none"> ▪ Disturbance on about 0.5 acre would have minimal potential impacts on water quality. ▪ Improved drainage conditions and percolation with infiltration gallery. <p>Project 4: NETCOM MET Site Future Expansion Area</p> <p>-Less than significant with mitigation.</p> <ul style="list-style-type: none"> ▪ Similar impacts as Project 1 above, only on up to 3.8 acres. 	<p>must describe best management practices (BMPs) to minimize the potential for exposed soils or other contaminants from construction activities in the project area to reach surface waters. Such BMPs could include application of water sprays to keep soil from becoming airborne, the use of silt fences, covering of soil stockpiles, use of soil sealants, re-vegetation of disturbed areas, or other BMPs as described in Geo Measures 1 through 4 in Section 3.10.3. In addition, post-construction stormwater management measures will need to be incorporated into the project design and a long-term maintenance plan will be established to comply with post-construction requirements of the General Permit.</p> <ul style="list-style-type: none"> ▪ Implement Geo Measures 1 through 4. ▪ Implement Haz Measure 1 	

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ACRONYMS AND ABBREVIATIONS

ADP	Area Development Plan
AEHF	advanced extremely high frequency
BMP	best management practice
CDFW	California Department of Fish and Wildlife
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
EA	environmental assessment
ICRMP	Integrated Cultural Resource Management Plan
INRMP	Integrated Natural Resources Management Plan
MET	Modernization of Enterprise Terminals
NEPA	National Environmental Policy Act
NETCOM	Network Enterprise Technology Command/9th Army Signal Command
NHPA	National Historic Preservation Act
NRL	Naval Research Lab
SATCOM	Satellite Communications
SHPO	State Historic Preservation Officer
SWPPP	stormwater pollution prevention plan
USAG POM	United States Army Garrison, Presidio of Monterey
U.S. Army	United States Army
USC	United States Code
USFWS	U.S. Fish and Wildlife Service

CHAPTER 1

PURPOSE OF AND NEED FOR ACTION

1.1 BACKGROUND

The United States Department of Army (U.S. Army) has prepared this Environmental Assessment (EA) to evaluate the environmental effects of implementing four construction projects at the Satellite Communications (SATCOM) site at Camp Roberts in support of the Naval Research Lab (NRL) and U.S. Army Network Enterprise Technology Command/9th Army Signal Command (NETCOM) operations. The U.S. Army owns Camp Roberts, which is licensed to and managed by the California Army National Guard. Within the boundary of Camp Roberts is SATCOM, an approximately 81-acre property managed by the U.S. Army Garrison (USAG) Presidio of Monterey (POM) where the U.S. Army maintains operational control. This EA was prepared using existing information from previous EAs for other activities at the SATCOM site, including the 2005 Programmatic Area Development Plan (ADP) EA, 2013 SATCOM Fence (Anti-Terrorism Force Protection Measures) Supplemental EA, and 2010 SATCOM Regional Hub Node Project EA, in combination with supplemental information from field surveys and other background research collected for the four projects. Information from the EAs is incorporated by reference in this EA, where appropriate. This EA provides a project-specific analysis for the four proposed construction projects and has been prepared pursuant to the National Environmental Policy Act (NEPA) of 1969, 42 United States Code (USC) §4321 et seq., and the Council on Environmental Quality (CEQ) regulations for implementing NEPA, 40 Code of Federal Regulations (CFR), Parts 1500–1508.

The SATCOM facility currently occupies a fenced 23-acre area on the SATCOM property at the southern end of Camp Roberts in San Luis Obispo County, California (see Figures 1 and 2 at the end of this chapter). The 2005 ADP EA evaluated the environmental effects of expanding the SATCOM facility to the north and west on approximately 58 acres of undeveloped land (U.S. Army 2005). As a supplement to the 2005 ADP EA, a focused analysis of the proposed perimeter fence was conducted in the 2013 Anti-Terrorism Force Protection Measures EA (U.S. Army 2013). A 2014 real estate use agreement provides the U.S. Army exclusive use of the expansion area containing approximately 57.6 fenced acres. One of the projects being evaluated in this EA would be located within the boundaries of the expanded perimeter fence in the expansion area; however, that project was not specifically evaluated in the 2005 ADP EA, resulting in the need for its evaluation in this EA. The other three projects would be located outside the existing and expanded perimeter fences, to the south of the existing SATCOM facility. Additional details on the projects are presented in Chapter 2.

1.2 PURPOSE AND NEED

The proposed action is needed to facilitate long-term growth and expansion of the SATCOM facility to respond to new technologies and accommodate additional communications needs associated with an enhanced mission definition and modernized equipment systems.

1.2.1 Antenna Sites Including Infrastructure

Similar to the long-term projects identified in the ADP (U.S. Army 2005), the two proposed antenna expansion areas for NRL and NETCOM are needed to respond to increasing demands on the frequency spectrum and continuing advances in technology that cause frequent changes in the equipment and management of communications systems, which have exceeded the capacities and capabilities of the SATCOM facility. The purpose of the NRL antenna is to conduct research and to develop advanced communication waveforms and algorithms for future Department of Defense spacecraft. An additional expansion site is also needed within the western expansion area associated with the 2005 ADP to support NETCOM operations. The purpose of the NETCOM Modernization of Enterprise Terminals (MET) site future expansion is to provide an area to allow placement of either two satellite antennas and a restoral pad or three antennas.

With the expansion of the SATCOM facility to the south to accommodate the proposed NRL antenna, a new perimeter security fence is needed to encompass the area and comply with Army Regulations and the Field Manual (FM 3-19.30) for Physical Security, which outline requirements for fencing, surveillance, lighting, and visibility. As an anti-terrorism force protection measure, the perimeter fence is needed to protect the new antenna facilities that are constructed in the southern expansion area. A clear zone, or area cleared of vegetation, rocks, and other debris, is needed along the fence to provide an unobstructed view of the fence and adjacent ground. Security lighting is needed to maintain visual-assessment capability during darkness. The purpose of the perimeter fence is to control and restrict access to the expanded area of the SATCOM site in order to protect the new antenna and associated facilities. Other facilities are not proposed at this time within the proposed fence, and additional NEPA compliance would be needed for those facilities.

1.2.2 Parking Lot

The purpose of the parking lot is to improve parking capability of the SATCOM site, specifically by providing about 40 designated spaces across from the SATCOM facility along the main access road (Perimeter Road). The area proposed as a new parking lot is currently used informally for parking, and improvements are needed to formally designate spaces and provide safety measures for pedestrians crossing Perimeter Road.

1.2.3 Water Discharge System

The purpose of the discharge system is to prevent ponding, erosion, or disturbance to soils or vegetation associated with the cooling tower discharge water. Currently, an evaporative cooling system with associated towers provides cooling for Building 18000. Water associated with the cooling system is discharged to the ground via a subterranean pipe that day lights outside of the current SATCOM fence line, resulting in a standing pool of water. Although the artificial pool provides a water source to some wildlife; nuisance species, such as wild pigs, are attracted to the area. In addition, the surface discharge has the potential to cause erosion or disturbance to the soil and vegetation, resulting in potential long-term impacts to water quality. The State Water Resources Control Board requires specific operations to be covered under the General Waiver of Waste Discharge Requirements For Specific Types of Discharges, Resolution No. R3-2008-0010. The cooling tower operations are currently covered under this waiver and are subject to all associated conditions. Modifications to the cooling tower operations were made based on requirements of the above listed waiver. Coordination with the Central Coast Regional Water Quality Control Board suggested that plans for long-term use of the cooling towers would require a contained discharge system that would prevent erosion and would allow for steady infiltration of any discharge water to ensure the discharge does not affect water quality. An engineered discharge system is needed to allow the water to properly infiltrate at its discharge point without causing ponding, erosion, or disturbance to soils or vegetation.

1.3 SCOPE OF THE DOCUMENT

This EA evaluates the environmental effects of four construction projects at the SATCOM site and focuses on those resource topics that would be affected by the proposed action. The analysis focuses on the project-specific environmental effects of the proposed action and incorporates applicable background information and measures from previous EAs at the SATCOM site. Relevant information, such as current environmental conditions, has been extracted or incorporated by reference from other recent EAs prepared for activities at the SATCOM site and supplemented with field surveys and additional research, where needed. Full titles of the documents incorporated by reference in this EA and the locations of those documents are listed below.

- Final Supplemental Environmental Assessment for Anti-Terrorism Force Protection Measures, SATCOM, Camp Roberts, CA, April 2013; available at USAG POM and Camp Roberts offices and online at: http://www.monterey.army.mil/dpw/env_assessment.html.
- Final Programmatic Environmental Assessment and Finding of No Significant Impact for Area Development Plan, SATCOM Complex Expansion, Camp Roberts, CA, September 2005; available at USAG POM and Camp Roberts offices.

- Final Environmental Assessment and Finding of No Significant Impact for SATCOM Regional Hub Node Project, Camp Roberts, California, December 2010; available at POM and Camp Roberts offices and online at: http://www.monterey.army.mil/dpw/env_assessment.html.

1.4 AGENCY AND PUBLIC PARTICIPATION

NEPA encourages lead agencies responsible for preparation of an EA to coordinate with the public and other governmental agencies and to solicit input on their proposed actions early in the decision-making process. This section discusses agency, tribal, and public involvement in the review of the Draft EA and consultations on the proposed action.

1.4.1 Public/Agency Review of Draft EA

The Draft EA was made available to the public and other agencies to provide comments on the proposed action, analyses, or other aspects of the document between March 30 and April 29, 2015. A list of individuals and organizations that were mailed notices about the availability of the Draft EA and how to comment is provided in Appendix A. A copy of the Draft EA was also available for review at the Paso Robles Public Library, 1000 Spring Street, Paso Robles, CA 93446, and at the San Miguel Library, 254 13th Street, San Miguel, CA 93451. An electronic version of the Draft EA was made available on the POM website at: http://www.monterey.army.mil/dpw/env_assessment.html. The Final EA will be posted on the same website as the Draft EA, and copies of the document will be sent to those who commented on the Draft EA.

A Notice of Availability of the Draft EA was published in the *Tribune*, the San Luis Obispo County newspaper, to inform the public about the availability of the EA and how and when to provide comments. A copy of the notice is included in Appendix A. The 30-day comment period began on March 30 and extended through April 29, 2015. This coordination fulfilled the requirements of the *Intergovernmental Cooperation Act of 1968* (42 USC 4231(a)) and the *Intergovernmental Review of Federal Programs* (EO 12372), which require federal agencies to cooperate with and consider federal, state, and local interests in implementing a proposal.

Two comment letters were received during the public review period for the Draft EA:

- Letter #1: Andy Mutziger, San Luis Obispo County Air Pollution Control District
- Letter #2: Camp Roberts staff, California Army National Guard

Copies of the comment letters are included in Appendix A, and responses to comments are provided following each letter. This EA has been revised to respond to comments, as described in the responses.

1.4.2 Endangered Species Act Compliance

A request for an official species list of candidate, proposed, threatened, and endangered species was submitted to the U.S. Fish and Wildlife Service (USFWS) Ventura Field Office via the Information, Planning, and Conservation System (IPaC website, <http://ecos.fws.gov/ipac/>) on February 5, 2014. The IPaC website includes a form to briefly describe the proposed action and identify the area of effects, which are used by the system and USFWS to determine which species may be affected by the proposed action. A preliminary list was generated by the website, with a note indicating the Ventura Field Office would contact the representative from the USAG POM. An official list was sent by the Ventura Field Office on February 13, 2014 (Appendix A).

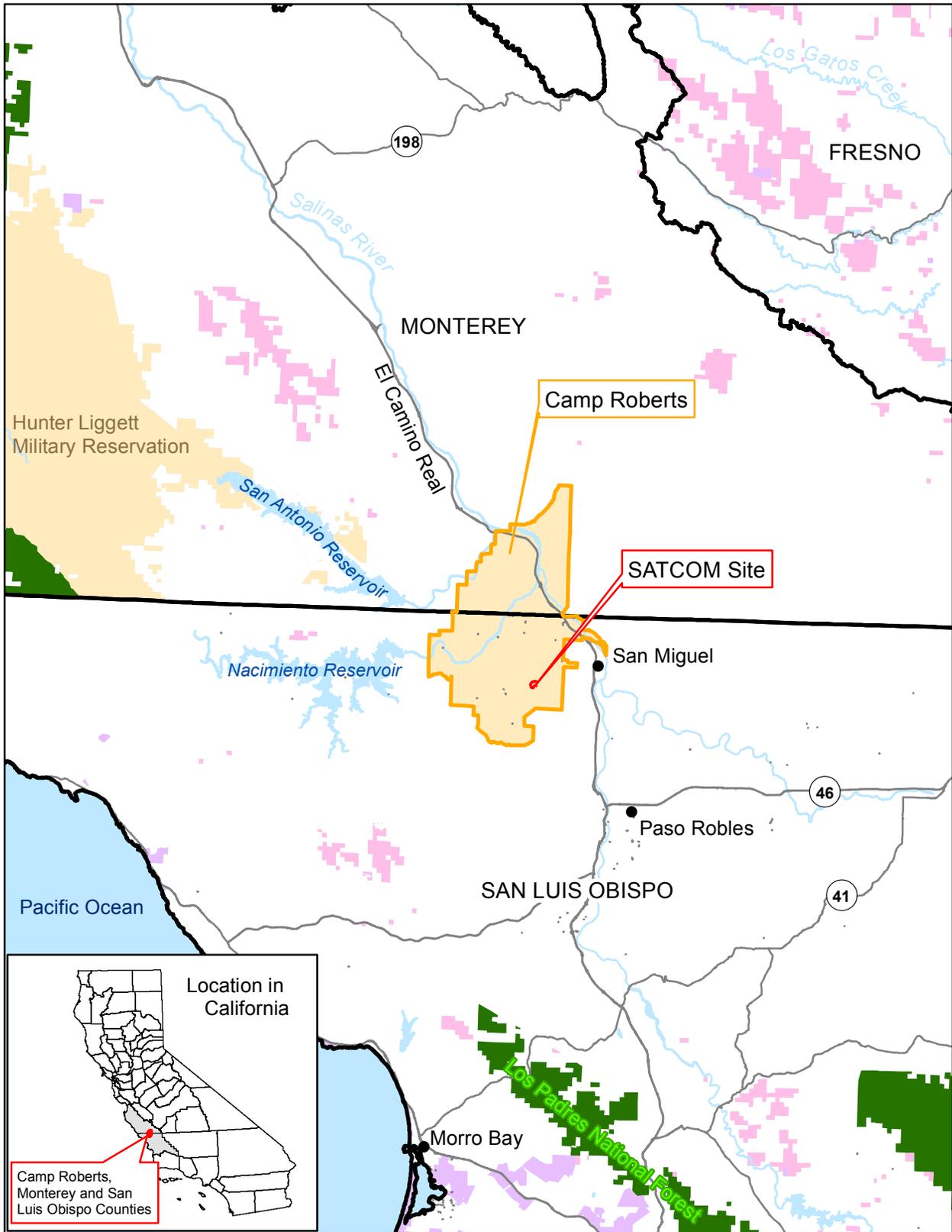
Camp Roberts has a Programmatic Biological Opinion (1-8-08-F-24), dated August 21, 2009, for various activities conducted at Camp Roberts in support of its military training program, as well as livestock grazing and natural and cultural resources program management activities. The Biological Opinion does not specifically include projects at the SATCOM site, although the measures identified in it may be applied to SATCOM projects. The U.S. Army received a concurrence letter from the USFWS, dated May 6, 2005, regarding the effects of the long-range projects under the ADP on San Joaquin kit fox (not likely to adversely affect) and vernal pool fairy shrimp (no effect). Although the concurrence letter does not specifically apply to all of the construction projects, measures that were incorporated into the concurrence letter to minimize or avoid adverse effects on San Joaquin kit fox may also apply to the proposed action. Prior to the ADP, the USFWS had issued a Biological Opinion for Normal Operations and Construction Activities at SATCOM (1-8-96-F-25), dated May 21, 1996, and amended June 18, 1996. The four construction projects were not covered specifically under the Biological Opinion, but measures identified in it may also apply to the proposed action. The USAG POM sent a letter and a copy of the Draft EA to the USFWS on March 25, 2015, requesting concurrence of the proposed action's effects on federally listed species to comply with Section 7 of the Endangered Species Act. The USAG POM letter and USFWS concurrence letter are included in Appendix A.

1.4.3 National Historic Preservation Act Compliance

The Santa Ynez Band of Chumash Indians is the only known federally recognized Tribe associated with Camp Roberts. This Tribe was consulted in accordance with Section 106 of the National Historic Preservation Act (NHPA) in light of the ADP expansion, the Regional Hub Node Project, and the proposed action. A site visit for the proposed action was held on December 9, 2014. While the Tribe's Elders Council had no immediate concerns about the projects, they requested the implementation of measures in the event of an inadvertent discovery. This resulted in the requirement that a Native American advisor/consultant be present at SATCOM during ground-disturbing activities associated with the projects. The USAG POM sent a letter to the Tribe to request formal consultation on the proposed action on December 16, 2014. Copies of the correspondence are included in Appendix A.

The USAG POM also sent a letter to the State Historic Preservation Officer (SHPO) on December 16, 2014, to initiate consultation under Section 106 of the NHPA (16 USC. 470f; 36 CFR Part 800). The USAG POM requested concurrence that the proposed action would have no effect on historic properties, as none are present in the area of potential effect. The SHPO responded via letter on January 14, 2015, concurring with the USAG POM finding. Copies of the correspondence are included in Appendix A.

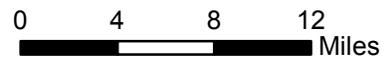
Inadvertent discoveries will require implementation of procedures set forth in POM's Integrated Cultural Resource Management Plan (ICRMP) and Army Regulation (AR 200-1), which includes consultation procedures and planning requirements in Section 106 of the NHPA. An inadvertent discovery of human remains, funerary objects, sacred objects, or objects of cultural patrimony will require implementation of the procedures set forth above and also procedures set forth in Section 3 of the Native American Graves Protection and Repatriation Act (25 USC 3001 et seq.; 43 CFR 10).

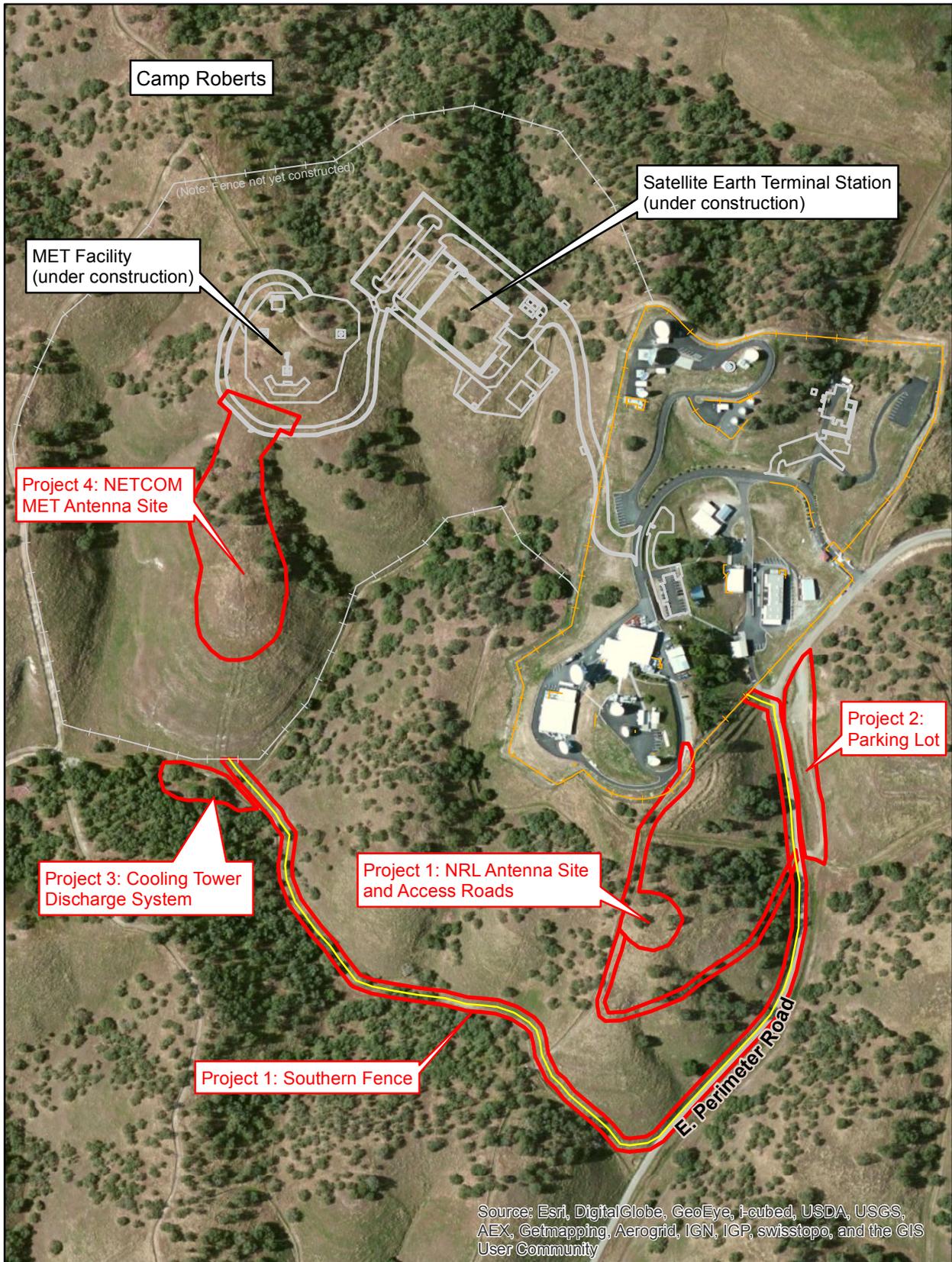


Legend

- | | |
|--|---|
| SATCOM | <i>Ownership/Management</i> |
| Camp Roberts | U.S. Army |
| City/Town | State |
| County | BLM |
| Major Road | Forest Service |
| River/Lake | |

**Figure 1.
Vicinity Map**





Source: Esri, DigitalGlobe, GeoEye, i-cubed, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

Legend

- Proposed Construction Project
- Proposed Fence
- Building (Existing or Under construction)
- SATCOM Fence (Existing)
- SATCOM Fence (To be constructed)

Figure 2.
Proposed Construction Projects



CHAPTER 2 DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

2.1 PROPOSED ACTION

2.1.1 Description of the Proposed Action

The four construction projects that comprise the proposed action are: 1) the SATCOM expansion to the south for construction of an NRL antenna pad and security fence, 2) a parking lot along Perimeter Road for NETCOM, 3) a discharge system for the cooling towers associated with Building 18000, and 4) a MET site future expansion for NETCOM. These projects are described below. The construction schedule for each project is expected to vary and will be determined once the necessary environmental approvals are obtained and the final designs can be completed. Project need and funding will also dictate when the projects are constructed. It is possible that all four projects may be constructed at the same time, although they will more likely follow separate design and construction schedules.

Project 1: SATCOM Expansion to South for NRL Antenna

The NRL is proposing to install a 22-meter-tall (72-foot-tall) antenna on a hill to the south of the existing SATCOM facility. The center of the antenna would be at the approximate center of the hill (3,780 feet above mean sea level), which is approximately 450 feet south of the current fence, just east of a dirt fire road. The antenna site would consist of an antenna pedestal, radome ring wall (88 feet in diameter), apron (150 feet in diameter), and equipment pads on the apron. Access to the antenna site would be from the southern perimeter road at the SATCOM facility to the existing fire road, which would be widened and improved. The new access road would be 18 feet wide and would be paved from the southern perimeter road to the antenna apron. Parking would be available along the road, and a corridor about 35 feet wide would be established, including the 18 feet of paved road and adjacent graded areas for parking.

If NRL determines that a secondary access road is desired, another 18- to 24-foot-wide road would be constructed from Perimeter Road around the hill to the south and up to the antenna site. The road would be paved and graded to a sufficient slope to allow personal and maintenance vehicles to access the antenna. If drainage is an issue along the proposed roads, culverts would be installed where necessary to maintain proper drainage. This access route would require a new gate with a motorized badge activated swing arm in the proposed perimeter fence near the southern edge of the proposed parking lot. Power and communications circuits for the gate would be routed back to the antenna site and/or building 18000 along roads or other disturbed areas. The proposed antenna site and associated access routes encompass approximately 1.5 acres.

Other necessary facilities to operate the antenna include the following:

- Electrical and telecommunication lines would be routed between building 18000, the antenna, electrical transformer, and anemometer via buried ducts; existing buried ducts would be reused where feasible, and new buried ducts would be located in previously disturbed or paved areas or under the new access road.
- A new water line would be located under the new access road from the existing water line within the SATCOM facility to the antenna.
- An anemometer tower foundation (approximately 11 by 11 feet) would be constructed near the antenna (outside the apron).
- An electrical transformer foundation (approximately 12 by 30 feet) would be constructed north of the antenna apron.
- A grounding well with an approximate depth of 600 feet and a width of 6 inches would be installed on the apron.

To support the final design, soil samples would be taken in six locations using 10-meter drill holes. One would be at the antenna center point location, and four would be approximately 42 feet from the center at equal distances apart. The sixth would be located at the center point of the anemometer tower location.

For security purposes, the perimeter fence around the existing SATCOM site would need to be expanded to encompass the proposed antenna site. The proposed security fence would be extended south from the existing SATCOM fence along Perimeter Road then northwest along fire roads to connect with the security fence being constructed to support the western expansion associated with the 2005 ADP (see U.S. Army 2005, 2013). The new fence would be designed similar to the existing perimeter fence and the fence described in the 2013 EA (U.S. Army 2013). The disturbance area associated with the fence and clear zone would encompass approximately 3.1 acres.

The new fence would consist of a chain link security fence with camera surveillance and security lighting. In accordance with Army Regulations for Physical Security (190-11, 13, and 16) and Field Manual 3-19.30 for Physical Security, a 40-foot-wide clear zone would be established along the fence, which would be cleared of all vegetation and debris above 8 inches tall and graded/leveled to allow visibility along the fence. The exterior and interior zones would be 20 feet wide and would consist of a dirt patrol road (Perimeter Road or the firebreaks) and adjacent area that is maintained clear of shrubs, trees, and other vegetation that could obstruct visibility. Trees that do not need to be removed outside the clear zone may require trimming to accommodate the security poles or maintain visibility in the clear zone. Vegetation and other debris removed during fence installation and establishment of the clear zone would be properly disposed of or recycled/reused if feasible.

The fence security system would require electrical and communications lines. Existing lines would be used where available, and new lines would be installed underground along the existing roads or in disturbed areas and would connect to the existing lines at the SATCOM facility. Security cameras and lights would be installed along the fence on the interior side. The fence would also be designed with consideration for small animal movement. Small openings (approximately 6 inches in diameter) would be incorporated into the fence at peaks and valleys to maintain ingress/egress for kit foxes and other small animals. Specific designs for the fence will be prepared once a funding source is identified.

Project 2: NETCOM Parking Lot along Perimeter Road

NETCOM is proposing to establish a formal parking lot along the east side of Perimeter Road south of the main SATCOM entrance where a dirt lot is currently used for overflow parking. The parking lot would provide approximately 40 standard parking spots. Establishment of the parking lot would require grading of an area up to approximately 500 feet long by 70 feet wide (less than 1 acre), which is currently mostly flat and gently sloping. Parking spaces would be angled with one way access (facing south) from an inlet off of southbound Perimeter Road and an outlet at an existing fire break. The surface of the parking lot would be compacted aggregate base course parking surface, asphalt/chip seal, or a similar surface that can withstand daily use and support striping. The parking lot would be surrounded by a 36- to 42-inch-tall chain link fence between the parking lot and an adjacent ditch for personnel safety. Surface runoff would be conveyed into the ditch as it drains off the parking lot.

Pedestrian access to the SATCOM site would be via a badge-activated turnstile in the existing fence adjacent to the delivery gate, which is already being constructed under a separate action. A crosswalk would be painted across Perimeter Road from the parking lot to the turnstile. The crosswalk would include a solar/battery pedestrian crossing with lighted flashing warning signs ahead of the crosswalk in each direction of travel.

Project 3: Discharge System for Cooling Towers

The USAG POM is proposing to install an engineered infiltration system to contain wastewater from two cooling towers associated with Building 18000. The cooling towers currently discharge concentrated water from the cooling system via a mostly subterranean pipeline that daylights outside the existing SATCOM fence, resulting in a standing pool of water. An infiltration gallery or similar system would be constructed where the wastewater is currently discharged.

Infiltrators would create a subsurface leach field where the discharge water would show no visible signs on the surface. The infiltrators would be installed on either native soil or a thin layer of gravel drain rock and would be manifold together and backfilled with drain rock. The infiltrators would be covered with about 12–18 inches of native soil. The infiltration area would be about 100 feet by 20 feet (less than 0.1 acre) or smaller; however, staging, access, and related construction activities would occur on surrounding land in an area encompassing about 0.5 acre total. An overflow area may be added to allow

the release of excess water during a rainfall to the existing surface swale. In addition, upstream of the infiltrators, an interceptor or settling basin with a weir may be installed to separate silt and debris that would otherwise fill the infiltrators and end up clogging the system. Infiltrators would need to be installed on a level surface.

The existing discharge pipe could be extended downslope beyond the immediate trees where the swale opens up, and this area could be excavated for the infiltrator installation. The exposed section of the discharge pipe near the SATCOM fence would need to be replaced with a storm drain pipe and protected with concrete or rock to prevent damage from animals.

Project 4: NETCOM MET Site Future Expansion Area

NETCOM is proposing to establish a MET site expansion area along the ridgeline west of the SATCOM facility to allow future placement of at least two satellite antennas and a restoral pad or three antennas. This area is within the western expansion area evaluated in the 2005 ADP EA (U.S. Army 2005), although the specific project was not discussed in that EA. The future MET site would be just south of an existing MET antenna site. The antennas may be built in phases, as they are needed. No occupied structures would be built in the expansion area. The antennas would house equipment in their base pedestals or in separate relocatable shelters, depending on the type of system installed. Antenna requirements have not been defined, but are anticipated to be no more extensive in size and installation/operation scope than the current MET antenna. The existing MET antenna is approximately 50 feet tall above foundation at its maximum arc and has a maximum pivot radius of about 28 feet. A radome is normally not required at this location for U.S. Army systems, but if required, it would be a globe about 70 feet in diameter. The MET site expansion area would encompass approximately 3.8 acres, although disturbance within that area would be limited to the maximum necessary to level the ridgeline and install the antennas and associated facilities.

A new two-lane access road would be extended off the existing MET access road. The roadway would widen to an approximately 125-foot-wide graded area for the length of the ridge line and would be regraded to a finished elevation of at least 1,100 feet.

The following utilities would be extended to the antenna site:

- The site would have dual source underground utility power at 12,470 volts brought to a low profile low voltage substation built on the site. Power would be provided from existing 12 kilovolt services at the MET access road intersection and extended to the substation in new concrete encased underground duct lines, one along each side of the road.
- Communications connectivity would be provided via a new concrete encased duct line extending from existing services in the MET access road.

- A nominal 6-inch-diameter fire service line would be extended from the MET fire service line at the MET site. The line would terminate in a hydrant on the new ridge site. The line would also provide water for an eyewash.
- The foundations for the antennas, shelters, and substation would include extensive electrical grounding. Grounding would be accomplished by extensive use of nominal 10-foot-tall rods and concrete encased electrodes. No chemical grounds or deep well grounds are anticipated.

2.1.2 Measures Incorporated into the Proposed Action

Construction contractors will likely be retained to construct the four projects described above. The construction contractors will be responsible for complying with relevant measures in the Camp Roberts Integrated Natural Resources Management Plan (INRMP, California Army National Guard 2001), the Camp Roberts ICRMP (*Draft*, National Guard Bureau 2011), the POM INRMP (USAG POM 2008), and the POM ICRMP (Presidio of Monterey 2004), as they apply to the proposed action and at the discretion of USAG POM. Because the SATCOM site is not managed by the California Army National Guard, the Camp Roberts plans do not directly apply to the site; however, the resources managed at Camp Roberts are similar to the resources present at the SATCOM site, and measures in those plans may be relevant to actions at the site, at the discretion of USAG POM. Likewise, the POM plans do not currently directly apply to the SATCOM site because it is not located within the boundaries of the POM or the Ord Military Community. The USAG POM is in the process of updating its plans to include applicable management guidelines from the Camp Roberts plans for the SATCOM site, and Camp Roberts is in the process of updating its INRMP. The updated plans will supersede the plans listed above once they are implemented. In the interim, the USAG POM will determine which of the measures in the Camp Roberts plans should be applied to actions at the SATCOM site. If guidance from the Camp Roberts and POM plans conflicts, the USAG POM will provide direction on the applicable guidance to follow for the proposed action.

The natural resources and management guidelines described in the current POM INRMP are specific to the POM and the Ord Military Community and are not necessarily applicable to the resources at the SATCOM site. Applicable general guidance from the POM INRMP includes:

- Protect endangered and threatened species by avoiding adverse impacts to known resources;
- Identify and avoid management actions that have the potential to adversely affect migratory bird populations;
- An International Society of Arboriculture-certified arborist shall supervise all phases of work concerning trees;

- Remove intrusive exotic vegetation from natural areas, to the extent practicable;
- Cover bare ground identified with the potential for erosion with weed-free straw (rice or saltgrass) and biodegradable erosion control matting, until erosion control vegetation becomes established; and
- Revegetate erodible soils with a mixture of native seed that totals 30 pounds per acre and includes only native grasses and forbs or non-invasive non-native grasses and forbs.

The Camp Roberts INRMP identifies management guidelines for standard operating procedures, erosion control, water pollution prevention, protecting sensitive species, and preserving grassland and oak woodland communities. Applicable measures from the Camp Roberts INRMP that would be implemented as part of the proposed action include:

- During construction activities, no ground disturbance, soil compaction, staging, or vehicle access will be allowed within the dripline of any native trees, unless authorized by USAG POM. Protective fencing at the dripline (the furthest point from the tree that is covered by the tree crown) will be used to protect native trees with diameters larger than 1 inch or heights of 2 inches or greater, regardless of diameter, during construction activities.
- Fasteners will not be allowed on any trees that are protected in place.
- Excavation or trenches that must be placed within a dripline will be hand-dug, augured, or bored. Major roots (2 inches or greater) shall be avoided whenever feasible. If roots cannot be avoided, all roots larger than 1 inch shall be cut clean.
- When pruning of native trees or cutting of roots larger than 2 inches in diameter is required, it must be done by an International Society of Arboriculture-certified arborist and in accordance with American National Standards Institute standards for arboriculture operations.
- Direct removal of or significant damage to standing native trees (those with diameters larger than 1 inch or heights of at least 2 feet, regardless of diameter) will be subject to the native replacement policy, which includes the following:
 - Any native tree (valley oak, blue oak, coast live oak, sycamore, willow, Fremont cottonwood, box elder, big leaf maple, black walnut, or pine) removed will be replaced by planting the same species at a 3:1 ratio (three new trees for every one tree removed) with a monitoring program. Replacement trees shall be one to five gallon (or equivalent) container stock and planted in an area not subject to future activities that would damage or remove them. They will be planted at appropriate densities on the SATCOM property or in areas approved by California Army National Guard.
 - Replacement trees will be watered at a frequency to ensure survival.

- Plantings should occur during the appropriate season (e.g., container stock should be planted early on in the rainy season) within 1 year of tree removal.
- Replacement plantings will be monitored for survival for a period of 3 years.
- If a 3:1 survivorship ratio (i.e., three surviving trees or seedlings for each tree removed) is not attained by the end of each year, sufficient numbers of additional trees will be planted and monitored for an additional 3 years until the desired success ratio is attained.
- As part of the monitoring program, the project proponent will provide an annual monitoring report describing the actions taken, the number of trees planted, and the number of trees remaining alive at the end of the season.
- Leave standing dead trees (snags) and fallen logs (coarse woody debris) when they are not safety hazards. Snags and coarse woody debris serve several important ecological functions. They provide structural habitat characteristics for various plant and animal species, are potentially important in long-term nutrient cycling, and help minimize effects, caused by erosion, to soil and water resources.
- Implement standard operating procedures for environmental protection (identified in Table 4-5 of the Camp Roberts INRMP).
- Implement BMPs for erosion control (identified in Table 4-7 of the Camp Roberts INRMP).
- Educate all military personnel who may have contact with listed species and/or their habitats.
- Conduct preactivity surveys for federally listed species, burrowing owls, and shining navarretia.

The ICRMPs for POM (Presidio of Monterey 2004) and California Army National Guard sites and training installations (*Draft*, National Guard Bureau 2011) identify standard operating procedures to protect cultural resources and comply with applicable federal laws. The standard operating procedures from the POM ICRMP include the following and are generally similar to the Camp Roberts ICRMP:

- Comply with Section 106 of the NHPA
- Comply with the Archeological Resources Protection Act of 1979
- Comply with the Native American Graves Protection and Repatriation Act

Specific guidance is provided in the ICRMPs to implement the standard operating procedures. Inadvertent discoveries will require implementation of procedures set forth in the POM ICRMP and Army Regulation (AR 200-1), which include consultation procedures and planning requirements in

Section 106 of the NHPA (16 USC. 470f; 36 CFR Part 800). An inadvertent discovery of human remains, funerary objects, sacred objects, or objects of cultural patrimony will require implementation of the procedures set forth above and also procedures set forth in Section 3 of the Native American Graves Protection and Repatriation Act (25 USC. 3001 et seq.; 43 CFR 10). Specific measures will be identified in coordination with the Santa Ynez Band of Chumash Indians as part of the consultation process. In the event of discovery of a paleontological resource during ground-disturbing activities, procedures identified in the Camp Roberts ICRMP will be implemented.

2.2 NO-ACTION ALTERNATIVE

Under the no-action alternative, none of the proposed construction projects would be implemented. This alternative would continue current operations and would not allow the U.S. Army to fulfill its objective to facilitate long-term growth and expansion of the SATCOM facility. This alternative is a point of reference to provide context for the proposed action. The no-action alternative is not a reasonable alternative to the proposed action because it does not fulfill the purpose of and need for the four construction projects.

2.3 ALTERNATIVES DEVELOPMENT

Development of the proposed action entailed the consideration of other options for facility locations and design. The following alternatives were considered but eliminated from detailed study.

2.3.1 Antenna Siting

With regard to the two antenna projects, the antenna must be situated on high ground with open southward exposure. Accordingly, much of the lower terrain in and around the SATCOM site was eliminated from consideration during siting of potential antenna locations. Also, any expansion areas associated with the SATCOM facility must be contiguous with the existing SATCOM site. This was based on the identified need to share utilities and infrastructure, as well as on lease and ownership constraints. Other potential locations on appropriate high ground sites adjacent to the existing SATCOM facility were considered but eliminated due to satellite obscuration issues.

2.3.2 NRL Fence Location

The location of the security fence around the NRL antenna site was chosen as the proposed action because of the ability to use existing roads as part of the clear zone and minimize disturbance and tree removal in the area. An alternate fence alignment around the proposed NRL antenna site was considered that would encompass only the antenna site. However, this alignment would require extensive grading to level the steep hill to accommodate the fence and associated clear zone. Due to the additional substantial environmental impacts, including removal of numerous blue oak trees and potential impacts to intermittent streams, this alternative was eliminated from further consideration.

2.3.3 Parking Lot

The location of the formal parking lot was chosen as the proposed action because of its current use as an overflow parking area, its relatively level ground, and its proximity to the main entrance at the SATCOM site.

2.3.4 Discharge System for Cooling Towers

Two additional alternatives for the discharge system for the cooling towers were considered. These alternatives were eliminated as they did not meet the purpose and need to eliminate standing water or ponding.

- Construct one large check dam or a series of check dams using sandbags to contain the discharge water. These check dams would raise the water level behind the dam, enlarging the infiltration area upstream, and greatly reducing the length and impact of the mud swale. Some standing water would be expected in the most upstream dams.
- Create a small earthen pond or dam or series of earthen dams using native soils and some impervious material or soil to retain the discharge water. The pond could be lined to create a permanent body of water or wetland. Two 25 feet by 25 feet non-lined ponds would fully contain the discharge water. The first pond would hold shallow standing water during the time of intense discharge, and water would rarely spill over to the second pond area. If water spills over to the second pond, the second area would become muddy and saturated. Both ponds could be lined with gravel sand and river rock to prevent a muddy bottom situation.

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CHAPTER 3 ENVIRONMENTAL CONDITIONS AND CONSEQUENCES

3.1 ANALYSIS APPROACH

The analysis of the proposed action incorporates relevant information, analyses, and measures from previous EAs at the SATCOM site. The types of impacts associated with the proposed action would be very similar to the actions evaluated in the 2005 and 2013 EAs. Based on analyses in those EAs and an initial review of potential impacts associated with the proposed action, several resource topics were not carried forward for detailed analysis (see Section 3.2). The discussion of environmental consequences in this EA focuses on those resources that could be adversely affected by the proposed action and may require avoidance, minimization, and/or mitigation measures to reduce or alleviate impacts. The project area evaluated in this EA is depicted in Figure 2 and encompasses approximately 9.5 acres, which includes the areas where the four construction projects would be implemented. The analysis addresses the individual impacts of each project, as well as the collective impacts of construction all of the projects at the same time. For some resources (e.g., air quality, cultural resources), impacts would be very similar for all projects, so the impacts are not separated out by project. For others that would have somewhat different impacts, the impacts of each project are discussed separately.

Resources evaluated in detail are:

- Air Quality
- Biological Resources
- Cultural Resources
- Hazards and Hazardous Materials
- Infrastructure
- Land Use
- Noise
- Soil Resources
- Transportation
- Visual Resources
- Water Resources

3.2 RESOURCE AREAS EXCLUDED FROM FURTHER ANALYSIS

After an examination of all resource areas and based on the analyses conducted in previous EAs for similar actions at the SATCOM site, it was determined that the proposed action would have no or insignificant effects on agricultural resources, climate, environmental justice, geology, population and housing, public services, recreation, and socioeconomics. These topics are not discussed further in this document, and the rationale for eliminating them from further consideration is presented in Table 3-1.

Table 3-1. Resource Areas Excluded from Further Analysis

<i>Resource Area</i>	<i>Reason for Dismissal</i>
Agricultural Resources	The SATCOM site does not contain active crop lands and grazing is no longer permitted around the site.
Climate	The proposed action would not affect climate of the region based on the nature of the activities.
Environmental Justice	No communities exist at the SATCOM site, and nearby communities outside of Camp Roberts, including low-income and minority populations, would not be affected.
Geology	The proposed action would not expose personnel at the SATCOM site to safety risks associated with earthquake activity or other geologic hazards. The facilities will be designed in accordance with applicable building code requirements and regulations.
Population and Housing	The SATCOM site does not support a population or contain any housing.
Public Services	No public services are provided at the SATCOM site.
Recreation	No recreation opportunities are available at the SATCOM site.
Socioeconomics	The proposed action would have a minimal short-term benefit to the local economy as a result of construction activities (jobs and purchasing of materials). No adverse impacts are anticipated.

3.3 AIR QUALITY

3.3.1 Existing Conditions

The air quality setting of the SATCOM site and surrounding area and air quality regulations that apply to activities at the SATCOM site are described in the previously prepared EAs for the SATCOM site (U.S. Army 2005, 2010, 2013). Air quality standards that establish thresholds for maintaining healthful air quality and the attainment status for the region have not changed since the Regional Hub Node EA was prepared (see Table 2-2 in U.S. Army 2010). Camp Roberts is in an area designated “attainment” for all federal criteria pollutants. Because the region is in attainment status, the General Conformity Rule under the Clean Air Act does not apply to federal actions in the region. Air quality is relatively good in the region, and violations of federal standards are rare. Air quality monitoring in San Luis Obispo County in 2013 reported violations of the 8-hour federal ambient air quality standard for ozone in the eastern portion of the county, but no violations for other criteria pollutants (U.S. Environmental Protection Agency 2013). Typical sensitive receptors, such as schools, houses, or hospitals, are not present near the SATCOM site; however, personnel at the SATCOM facility could be considered a sensitive receptor if they are outdoors and may be affected by poor air quality.

San Luis Obispo County and the City of Paso Robles have published recent inventories of air and/or greenhouse gas emissions for their jurisdictions. An overview of these inventories is presented in Tables 3-2 through 3-4 in the SATCOM Anti-Terrorism Force Protection Measures Supplemental EA (U.S.

Army 2013). Activities at SATCOM and elsewhere at Camp Roberts contribute to emissions in the county, although they are likely a small contributor, and could affect air quality in the nearby city of Paso Robles, depending on the extent of the emissions. Gasoline, natural gas, and electricity are the primary sources of emissions in Paso Robles, which likely result from transportation sources and residential, commercial, and industrial uses. Current activities at the SATCOM facility that contribute to air pollution emissions include vehicle traffic and electricity use.

3.3.2 Environmental Consequences

No-Action Alternative

None of the construction projects would be implemented. No construction or fugitive dust emissions would be generated. Ongoing activities at the SATCOM site would continue to generate emissions and contribute to overall emissions in the county, but no new emissions from construction or related activities would be generated.

Proposed Action

Construction emissions would be the primary contributor to air quality impacts from the proposed action. Construction activities associated with the four projects would result in varying levels of temporary emissions of air pollutants (e.g., CO, SO₂, NO_x, VOC, O₃ precursors), fugitive dust (PM₁₀ and PM_{2.5}), and greenhouse gases (e.g., CO₂, CH₄, N₂O). Construction equipment, such as graders, backhoes, compactors, and dump trucks, and worker vehicles would emit carbon monoxide, nitrogen and sulfur oxides, and/or particulate matter. Soil disturbance would generate fugitive dust. Specific equipment needs and the schedule for the construction projects are not known at this time to quantify emissions, but the construction activities would be similar in nature to the activities discussed in the Regional Hub Node EA (U.S. Army 2010), which involved construction on less than 1 acre. The construction of the NRL antenna facility, security fence, and associated access routes (up to 4.6 acres disturbed), as well as the NETCOM MET antenna facility (up to 3.8 acres disturbed) would disturb a larger amount of soil than the regional hub node project. The construction of the parking area (less than 1 acre disturbed) and infiltration gallery (up to 0.5 acre disturbed) would disturb a similar amount of soil or less than the regional hub node project.

The estimated emissions for the regional hub node project were well under the *de minimis* thresholds of 100 tons per year for all pollutants (see Table 2-5 in U.S. Army 2010). The construction of the NRL antenna facility and security fence, as well as the NETCOM MET antenna facility would be expected to produce slightly more emissions than the regional hub node project, while the construction of the parking area and infiltration gallery would be expected to produce a similar amount of emissions. Based on the calculations from the regional hub node project, emissions for each construction project would be below *de minimis* thresholds and would be relatively minimal compared with other emission sources in San Luis Obispo County. If all four of the projects were constructed at the same time, the emissions generated during construction would be greater over the same time period, but they would occur over

a shorter period than implementing the projects separately. However, the resulting emissions would still not be expected to cause regional violations of federal air quality standards based on the nature of the activities. In addition, implementation of Air Measures 1 through 6 would further reduce and minimize air quality impacts during construction activities for all projects.

The only sensitive receptor near the project area that could be affected by the temporary emissions is personnel at the SATCOM facility. Air quality effects would be localized around the project area, with few off-site vehicle-related emissions associated with workers traveling to the SATCOM site. The emissions would be expected to dissipate within the immediate vicinity (i.e., around the SATCOM site) and would not be expected to affect air quality in Paso Robles or other communities in the vicinity.

Operational emissions associated with the four construction projects would be minimal and limited to indirect emissions associated with electricity use, minor increases in vehicle emissions from the additional personnel needed to operate and maintain the facilities, and periodic direct emissions from vehicle use along access roads and during security patrols or maintenance along the expanded security fence. Operational emissions would also be below the Air Pollution Control District's significance threshold values of 25 pounds per day for fugitive particulate matter and 25 pounds per day and/or 25 tons per year for ROG + NO_x and less than the annual greenhouse gas emission threshold of 1,150 metric tons. Although frequent access along the dirt roads on both sides of the security fence, specifically six round trips daily, could generate PM₁₀ emissions above the threshold value based on the 2013 EA analyses, the proposed action would involve few and infrequent truck trips over the long term and would not require that many trips on a daily basis.

3.3.3 Avoidance, Minimization, and/or Mitigation Measures

Air Measures 1 through 7, as described in the 2005 EA and updated in the 2013 EA in coordination with the San Luis Obispo County Air Pollution Control District, would minimize adverse air quality effects during construction of each project. All required fugitive dust measures will be shown on grading and building plans, and applicable federal, state, and county air quality requirements will be adhered to during construction. Air Measures 1 through 6 shall be implemented per agency consultation, permit conditions, Installation management plans, and/or BMPs. Air Measure 7 is a required mitigation.

Air Measure 1: Minimize disturbance

Minimize the area disturbed due to clearing, earthmoving, or excavation activities. The contractor(s) or builder(s) shall designate a person or persons to monitor the fugitive dust emissions and enhance the implementation of all air quality measures as necessary to minimize dust complaints and reduce visible emissions below 20 percent opacity. Their duties shall include holidays and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the

Air Pollution Control District Compliance Division prior to the start of any grading, earthwork, or demolition.

Air Measure 2: Water disturbed areas

Sufficiently water all excavated or graded areas to prevent excessive dust generation and increase watering frequency when wind speeds exceed 15 miles per hour. Use water trucks or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site. Reclaimed (non-potable) water should be used whenever possible. To the extent feasible, APCD-approved dust suppressants (see San Luis Obispo County Air Pollution Control District 2012) should be used to reduce the amount of water used for fugitive dust control.

Air Measure 3: Limit vehicle speeds

Limit construction vehicle speeds to 15 miles per hour on unpaved surfaces at the construction site.

Air Measure 4: Control dust

Water or chemically treat all unpaved active portions of the construction site as necessary to control windblown dust and dust generated by vehicle traffic. All dirt stockpile areas should be sprayed daily as needed. Install wheel washers where vehicles enter and exit unpaved roads onto streets, or wash off trucks and equipment leaving the site. All roadways, driveways, sidewalks, etc. to be paved should be completed as soon as possible. Sweep streets at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers with reclaimed water should be used where feasible.

Air Measure 5: Revegetate disturbed areas

Implement native species revegetation and landscape plans as soon as possible following completion of soil disturbing activities. Exposed ground areas that are planned to be reworked at dates greater than one month after initial grading should be sown with a fast germinating, non-invasive, grass seed and watered until vegetation is established. All disturbed soil areas not subject to revegetation should be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the Air Pollution Control District.

Air Measure 6: Protect truck loads

Ensure that trucks hauling dirt, sand, soil, or other loose materials are covered or maintain at least two feet of freeboard (minimum vertical distance between the top of the load and the top of the trailer) in accordance with California Vehicle Code Section 23114.

Air Measure 7: Naturally Occurring Asbestos

This measure is a required mitigation to reduced impacts to less than significant. Prior to construction activities, an evaluation for naturally occurring asbestos in the soils/geological units where ground disturbance is proposed will be conducted. If the area is exempt from the regulation, an exemption request will be filed with the APCD. If the site is not exempt, all requirements of the Asbestos Air Toxics Control Measure will be followed.

3.4 BIOLOGICAL RESOURCES

3.4.1 Existing Conditions

The biological setting is based on a reconnaissance-level survey of the project area conducted in November 2013 and a biological characterization report prepared in support of this EA (North State Resources, Inc. 2014a). The report summarizes biological information from previous surveys conducted at the SATCOM site and proposed expansion area in support of the ADP (U.S. Army 2005), an assessment of special-status species conducted for the Anti-Terrorism Force Protection Measures project (U.S. Army 2013), and other reports and environmental documents for activities at the SATCOM site.

Vegetation

The project area supports rolling hills of annual grasslands, blue oak woodlands, and developed areas. Descriptions of these vegetation communities/habitats are provided in the biological characterization report (North State Resources, Inc. 2014a) and previously prepared EAs for the SATCOM site (U.S. Army 2005, 2010, 2013). A total of 69 oak trees and other species of trees were estimated to be present in the project area. The estimated tree count at each individual project area is: 1) 39 trees at the NRL antenna pad and along the southern perimeter fence, 2) one (1) tree at the parking lot along Perimeter Road, 3) nine (9) trees at the discharge system for the cooling towers associated with Building 18000, and 4) 20 trees at the MET site future expansion for NETCOM. These estimates are based on a field reconnaissance, review of aerial photographs, and review of tree count data for the perimeter fence project (U.S. Army 2013) and are subject to verification by an arborist survey. The density of younger trees is anticipated to be low based on the lack of observations of seedlings and saplings during field surveys and current conditions in the project area (North State Resources, Inc. 2014a).

Based on the assessment of special-status plant species in the biological characterization report, the plants listed below may be present in annual grasslands or blue oak woodlands in the project area (documented occurrences are based on the California Natural Diversity Database records, California Department of Fish and Wildlife [CDFW] 2014; listing status and Rare Plant Rank noted after scientific name). One federally listed plant, purple amole (*Chlorogalum purpureum* var. *purpureum*), may be found in the oak woodlands or grasslands in the project area. A description of this species is in the biological characterization report. None of these species were observed during planning-level surveys in the expansion area west of the SATCOM site, which encompasses the proposed MET site (Tetra Tech, Inc. and ICF International 2014).

- Dwarf calycadenia (*Calycadenia villosa*, 1B.1) – two documented occurrences at Camp Roberts;

- Jones' bush mallow (*Malacothamnus jonesii*, 4.3) – suitable habitat, but no documented occurrences nearby;
- Koch's cord moss (*Entosthodon kochii*, 1B.3) – only one documented occurrence at Camp Roberts;
- Lemmon's jewelflower (*Caulanthus coulteri* var. *lemmonii*, 1B.2) – two documented occurrences at Camp Roberts;
- Pale-yellow layia (*Layia heterotricha*, 1B.1) – one documented occurrence at Camp Roberts;
- Purple amole (also referred to as Santa Lucia purple amole) (federally threatened, 1B.1) – one documented occurrence at Camp Roberts;
- Rattan's cryptantha (*Cryptantha rattanii*, 4.3) – suitable habitat, but no documented occurrences nearby;
- Round-leaved filaree (*Erodium macrophyllum*, 1B.1) – several documented occurrences in San Luis Obispo County outside of Camp Roberts;
- San Luis Obispo owl's-clover (*Castilleja densiflora* ssp. *obispoensis*, 1B.2) – two documented occurrences at Camp Roberts;
- Shining navarretia (*Navarretia nigelliformis* ssp. *radians*, 1B.2) – several historic occurrences at Camp Roberts;
- Small-flowered gypsum-loving larkspur (*Delphinium gypsophilum* ssp. *parviflorum*, 3.2) – suitable habitat, but no documented occurrences nearby; and
- Straight-awned spineflower (*Chorizanthe rectispina*, 1B.3) – one documented occurrence at Camp Roberts.

Wildlife

The vegetation communities in the project area support a variety of wildlife species, such as coyote (*Canis latrans*), mule deer (*Odocoileus hemionus*), red-tailed hawk (*Buteo jamaicensis*), and various other raptors and migratory birds. Common species found at the SATCOM site are described in the biological characterization report (North State Resources, Inc. 2014a) and other previously prepared EAs for the SATCOM site (U.S. Army 2005, 2010, 2013).

Based on the assessment of special-status wildlife species contained in the biological characterization report, vernal pool fairy shrimp is not likely to occur in the project area due to a lack of suitable vernal pool habitat; however, it has been encountered recently in rain-filled ruts along dirt roads at Camp Roberts, and presence/absence has not been confirmed at or near the SATCOM site. Habitat for vernal pool fairy shrimp was not detected at the MET site during a habitat assessment conducted from May

29–31, 2013, for the western expansion of the SATCOM site (Tetra Tech, Inc. and ICF International 2013). Other federally listed or protected wildlife species that could occur in the project area include golden eagle (*Aquila chrysaetos*) and San Joaquin kit fox (*Vulpes macrotis mutica*). Descriptions of these species are in the biological characterization report.

Based on the assessment of special-status wildlife species contained in the biological characterization report, the following species may nest, roost, burrow, or dwell in the annual grasslands and blue oak woodlands in the project area:

- Coast horned lizard (*Phrynosoma blainvillii*, California species of special concern) – two documented occurrences from the 1990s to 2000s at Camp Roberts;
- San Joaquin whipsnake (*Masticophis flagellum ruddocki*, California species of special concern) – several documented occurrences from the 1990s to 2000s at Camp Roberts;
- Silvery legless lizard (*Anniella pulchra pulchra*, California species of special concern) – two documented occurrences from the 1990s at Camp Roberts;
- California horned lark (*Eremophila alpestris actia*, California watch list) – two documented occurrences from 1999 at Camp Roberts;
- Cooper’s hawk (*Accipiter cooperii*, California watch list) – no documented occurrences at Camp Roberts, but suitable habitat present;
- Golden eagle (federally fully protected, California fully protected) – 244 adult and 157 juvenile golden eagles observed between 1993 and 2013 at Camp Roberts;
- Loggerhead shrike (*Lanius ludovicianus*, California species of special concern) – previously documented at Camp Roberts (per 2001 INRMP);
- Western burrowing owl (*Athene cunicularia hypugea*, California species of special concern) – several documented occurrences from the 1990s to 2000s at Camp Roberts;
- American badger (*Taxidea taxus*, California species of special concern) – 82 adult and 57 juvenile American badgers observed between 1993 and 2013 at Camp Roberts;
- Monterey dusky-footed woodrat (*Neotoma macrotis luciana*, California species of special concern) – one documented occurrence south of the project area at Camp Roberts;
- Pallid bat (*Antrozous pallidus*, California species of special concern) – one documented occurrence from the 1990s at Camp Roberts and documented in 2013 during planning-level surveys in the western expansion area (Tetra Tech, Inc. and ICF International 2014);
- Salinas pocket mouse (*Perognathus inornatus psammophilus*, California species of special concern) – several documented occurrences from the 1990s at Camp Roberts; and

- San Joaquin kit fox (federally endangered, state threatened) – several documented occurrences from 1970s to 2000s at Camp Roberts, although recent preactivity and planning-level surveys and a habitat assessment near the project area did not identify any signs or dens of kit fox (Madison, L., pers. comm., 2012; Vanherwig 2011; Tetra Tech, Inc. and ICF International 2014).

In addition to the species listed above, the following special-status species may forage in or be occasional migrants to the project area:

- Bald eagle (*Haliaeetus leucocephalus*, federally delisted, state endangered and fully protected);
- California condor (*Gymnogyps californianus*, federally and state endangered);
- Ferruginous hawk (*Buteo regalis*, California watch list);
- Merlin (*Falco columbarius*, California watch list);
- Osprey (*Pandion haliaetus*, California watch list);
- Prairie falcon (*Falco mexicanus*, California watch list);
- Sharp-shinned hawk (*Accipiter striatus*, California watch list);
- Swainson's hawk (*Buteo swainsoni*, state threatened);
- Tricolored blackbird (*Agelaius tricolor*, California species of special concern);
- White-tailed kite (*Elanus leucurus*, state fully protected);
- Townsend's (=western) big-eared bat (*Corynorhinus townsendii*, candidate for listing as threatened or endangered under the California Endangered Species Act); and
- Western red bat (*Lasiurus blossevillii*, California species of special concern).

3.4.2 Environmental Consequences

No-Action Alternative

No construction activities would be implemented, and the project area would remain in its current condition, which ranges from developed (i.e., roads, parking area) to relatively undisturbed. No trees would need to be removed. Wildlife would not be exposed to noise and human disturbance associated with construction. The existing fence around the SATCOM facility would continue to serve as a barrier to some wildlife species, but little habitat exists within the existing fence to attract wildlife to the site. Biological conditions would be the same as current conditions, and ongoing operations at the SATCOM site would continue to result in periodic disturbance to wildlife and vegetation in the area. The existing discharge site for the cooling towers would continue to provide an artificial source of water for wildlife, which attracts nuisance species, such as wild pigs, and provides a value for native wildlife, such as

birds, bats, elk, and aquatic invertebrates. No new impacts on special-status species, such as San Joaquin kit fox, would occur.

Proposed Action

Construction activities for each project could result in impacts to biological resources within the project area. Installation of new facilities, such as the antennas and security fence, would require vegetation removal and could result in the removal of special-status plants and disturbance to special-status wildlife, such as the San Joaquin kit fox, and nesting migratory birds or roosting bats in oak woodlands and grasslands. Construction activities could also result in the spread of invasive plants. If construction activities for all four projects occur at the same time, the collective impacts would be greater because of the larger amount of simultaneous disturbance across the project area and increased potential to affect special-status species. To avoid or minimize impacts to special-status species in the project area, measures described in Section 3.4.3 should be implemented. Operation-related effects would be minimal and similar to current activities at the SATCOM site. Biological resources impacts for each project are discussed below.

Project 1: SATCOM Expansion to South for NRL Antenna

Construction activities associated with NRL antenna and associated access roads would involve ground disturbance and vegetation removal on about 1.5 acres of blue oak woodlands and grasslands on a hill south of the existing SATCOM facility. No oak trees are expected to be removed for the antenna facilities or primary access road because the facilities can be designed to avoid the few trees on the hilltop. The secondary access road from Perimeter Road to the hilltop could require removal of up to eight trees, depending on the specific alignment. Establishment of the clear zone along the new security fence around the antenna site would require removal of up to approximately 22 oak trees and other vegetation within a 40-foot wide corridor (about 3.1 acres). Over half of the proposed clear zone along the fence already contains existing dirt and paved roads, while the remainder contains relatively undisturbed grasslands and oak woodlands. Although the fence alignment has been designed to minimize tree removal by following existing roads, dense areas of blue oak woodlands surround the SATCOM facility, particularly in the eastern portion of the proposed clear zone, and complete avoidance may not be feasible. Oak trees that must be removed or are significantly damaged during the course of the project will be replaced through plantings within the project area and/or at a designated location at Camp Roberts in accordance with Bio Measure 1; the specific number of trees removed and the replacement needs will be finalized by a certified arborist prior to construction.

Ground-disturbing activities (e.g., excavating, trenching, grading) could introduce or spread invasive plant species that could degrade adjacent habitats; remove populations or individuals of special-status plants, such as the federally listed purple amole; injure wildlife, such as San Joaquin whipsnake, and other ground-dwelling species; and disturb nesting or roosting wildlife in adjacent habitats. If construction activities or tree removal is scheduled during the nesting period (typically February

through end of September), disturbance to nesting birds could result in loss of young and adverse effects on protected species. Similarly, tree removal could disturb or injure roosting bats, which could also result in the loss of young or other adverse effects on special-status species. Most wildlife, such as American badger and San Joaquin kit fox, would be expected to avoid the project area during construction, returning to the area when construction is finished, and would be able to use nearby habitats within Camp Roberts. The habitat in and adjacent to the project area has been determined to be marginally suitable for the kit fox. The most recent observation of a kit fox at Camp Roberts was in 2007 (U.S. Army 2010). No active dens are expected to be present in the project area, and the potential for impacts on San Joaquin kit fox is considered low. Implementation of Bio Measures 2 through 4 would reduce the potential for adverse impacts on San Joaquin kit fox and its habitat. Bio Measure 6 would prevent the spread of invasive plants. Preactivity surveys for special-status plants would be conducted, and measures to protect plants that are present would be implemented to avoid the potential loss of individuals or populations (see Bio Measure 7). Preactivity surveys for nest and roost sites and protection of active sites would avoid direct or indirect impacts on nesting and roosting birds and bats during construction, particularly tree removal activities (see Bio Measure 8).

Construction access along unpaved roads and use of the unpaved secondary access road to the antenna site during periods of wet weather could result in impacts to vernal pool fairy shrimp, if they are present in rain-filled ruts along the roads. Surveys for the federally listed vernal pool fairy shrimp have not been conducted at the SATCOM site or in the expansion area; however, the U.S. Army will coordinate with the USFWS on measures that may need to be implemented for future projects at the SATCOM site. Until presence/absence is confirmed, the U.S. Army will prudently adopt the measures contained in the *Programmatic Biological Opinion for Multiple Activities at Camp Roberts, San Luis Obispo and Monterey Counties, California (1-8-08-F-24)*. Avoidance measures identified in the Programmatic Biological Opinion will be implemented for the proposed action, including educating workers on the species and its habitat and avoiding ground-disturbing activities during the wet season (typically November 1 through April 30) (see Bio Measure 5 below). Compliance with the Programmatic Biological Opinion would avoid potential impacts on the vernal pool fairy shrimp.

Over the long term, periodic disturbance to wildlife would result from security patrols, maintenance activities, and periodic vegetation trimming or mowing in the clear zone along the fence. Security lighting along the fence would create a new source of light around the SATCOM site, but the lighting would be directed at the clear zone and would produce minimal glare that could disturb wildlife in the surrounding areas. The lighting could discourage some animals, particularly nocturnal animals, from using the habitats in and adjacent to the project area. Lighting along the fence would illuminate some areas that were not previously illuminated. This could affect some wildlife species, such as San Joaquin kit fox, bats, and other nocturnal animals, by disrupting nocturnal foraging or other activities. For example, small mammals could be more susceptible to predation in these areas because the light would

make them more visible to predators. Bats are more likely to avoid the illuminated areas, even though the lighting would attract insects (their prey), due to the potential for predation and the general disruption to the normal pattern of light and dark during a day (Bat Conservation Trust 2009). Most wildlife would likely avoid the illuminated area and may relocate to areas away from the SATCOM site. For security reasons, minimizing the illuminated area is not feasible; however, the use of lighting that minimizes illumination and attractants to insects (see Bio Measure 9) could reduce adverse effects on wildlife, particularly bats.

The fence would incorporate openings to allow small wildlife and San Joaquin kit fox to continue to use habitat at the SATCOM site (see Bio Measure 2), although the lighting may deter some animals from getting too close to the fence and using the openings. With the openings, the new fence would not fully restrict access to habitats around the antenna site or serve as a barrier to movement for most wildlife. For some bats, the lighting along the fence could create a barrier that prevents bats from moving around or through the light sources. Designing the lighting to minimize illumination (see Bio Measure 9) could reduce light-related impacts on bats.

The new antenna and associated facilities would be designed to be consistent with existing facilities at the SATCOM site and would have a low potential to affect birds or bats flying through the project area based on the antenna's proximity to the existing facilities. The security fence around the antenna site would also not result in a major obstruction to wildlife movement in the general area, primarily because of the availability of expansive woodlands and grasslands in the vicinity. Long-term effects would be periodic and minor and would be similar to existing disturbance associated with ongoing operations of the SATCOM facility.

Project 2: NETCOM Parking Lot along Perimeter Road

A formal parking lot would be established in an area currently used for parking along the east side of Perimeter Road south of the main SATCOM entrance (about 1 acre). Site preparation and resurfacing of the parking lot would require minimal vegetation removal of herbaceous and weedy species. The single tree at the edge of the parking lot is expected to be avoided, but some work to resurface the parking lot may take place within the dripline of the tree. Implementation of Bio Measure 1 would ensure protection of the tree. Establishment of the parking lot is not expected to affect special-status plants due to a lack of habitat for the species listed in Section 3.4.1. Construction equipment could introduce or spread invasive plant species that could degrade adjacent habitats, but this would be prevented with implementation of Bio Measure 6. Also, the resurfacing of the parking lot would reduce the potential for invasive plants to become established.

Construction activities could remove or disturb active burrows of western burrowing owl, if present in or around the proposed parking lot, or disturb nesting or roosting activities of special-status birds or bats in adjacent oak woodlands. No impacts on vernal pool fairy shrimp or San Joaquin kit fox habitat

are expected due to a lack of suitable habitat in the proposed parking lot. Most wildlife, such as American badger, would be expected to avoid the project area during construction and would be able to use nearby habitats at Camp Roberts. Preactivity surveys for San Joaquin kit fox (Bio Measure 3) and for nest and roost sites (Bio Measure 8) and protection of active sites would avoid direct or indirect impacts on the kit fox and nesting and roosting birds and bats in adjacent areas during construction.

Primary long-term effects would result from increased use of the parking lot, which could disturb wildlife in adjacent habitats. Traffic along Perimeter Road accessing the parking lot also has the potential to injure San Joaquin kit fox crossing the road. Implementation of Bio Measure 4 would reduce the potential for adverse impacts on San Joaquin kit fox over the long term. Lighting around the parking lot should be designed with consideration for bats and other nocturnal wildlife (see Bio Measure 9).

Project 3: Discharge System for Cooling Towers

Installation of the infiltration gallery would involve ground disturbance in an area about 0.1 acre that is currently used to discharge wastewater plus adjacent areas (about 0.4 acre) for access, staging, and equipment use. Pipeline replacement would also involve ground disturbance in a relatively small area that is already disturbed. No trees are expected to be removed to accommodate the project, but ground disturbance may be necessary within the driplines of native trees adjacent to the proposed infiltration gallery. Implementation of Bio Measure 1 would protect the trees and reduce the potential for root damage or other damage to the trees. Special-status plants are not likely to occur in the location of the proposed infiltration gallery due to the existing disturbed nature of the discharge area; however, they could be found in adjacent areas where staging and access would take place. Implementation of Bio Measure 7 would ensure protection of any special-status plants found during a preactivity survey. Construction equipment could introduce or spread invasive plant species that could degrade adjacent habitats, but this would be prevented with implementation of Bio Measure 6.

Construction activities could disturb special-status wildlife species and nesting birds or roosting bats near the work area. Vernal pool fairy shrimp could occur in rain-filled ruts along roads that provide access to the proposed infiltration gallery location, and the fairy shrimp could be affected by construction-related vehicle traffic during periods of wet weather. Preactivity surveys for nest and roost sites and protection of active sites would avoid indirect impacts on nesting and roosting birds and bats in adjacent areas during construction (see Bio Measure 8). As discussed for the NRL antenna expansion project, avoidance measures identified in the Programmatic Biological Opinion will be implemented for the proposed action (see Bio Measure 5 below), and compliance with the Programmatic Biological Opinion would avoid potential impacts on the vernal pool fairy shrimp.

As discussed for the NRL antenna expansion project, habitat in and adjacent to the project area has been determined to be marginally suitable for San Joaquin kit fox. Kit fox are not expected to den in the location of the proposed infiltration gallery or pipeline replacement; however, they could be passing

through or foraging in or near these areas during construction. Foraging habitat is abundant in areas surrounding the project. Most wildlife, such as American badger and San Joaquin kit fox, would likely avoid the construction area while foraging and return after construction is complete. Implementation of Bio Measures 3 and 4 would reduce the potential for adverse impacts on San Joaquin kit fox during and following construction.

Primary long-term effects would result from periodic maintenance activities at the infiltration gallery, which could disturb wildlife in adjacent habitats. Traffic along access roads also has the potential to injure San Joaquin kit fox crossing the roads. Implementation of Bio Measure 4 would reduce the potential for adverse impacts on San Joaquin kit fox over the long term. The infiltration gallery would be below ground and would no longer provide a water source for wildlife. Nuisance wildlife would be less attracted to the area, but native wildlife would also have to seek other water sources at Camp Roberts. The conversion of the discharge site to an infiltration gallery would have an overall benefit to the quality of the habitat and environment by reducing soil erosion associated with the discharge, and the removal of the small water source is considered a minor impact on wildlife use of the area.

Project 4: NETCOM MET Site Future Expansion Area

A MET site expansion area would be established along the ridgeline west of the SATCOM facility, resulting in vegetation removal and ground disturbance on up to approximately 3.8 acres. The location of this project is in the westward expansion of the SATCOM site, which was previously evaluated in the 2005 ADP EA (U.S. Army 2005). In addition, the MET site expansion area is within an area proposed for fencing, and the effects of fencing the area around the MET site were evaluated in the 2013 EA (U.S. Army 2013). Biological impacts and measures discussed in those EAs were incorporated into this analysis, to the extent applicable.

Establishment of the MET site expansion area would require the removal of up to 20 trees. Other impacts during construction activities and long-term operation of the MET site would be similar to those described for the NRL antenna expansion project above (those impacts were derived from the analyses in the 2005 and 2013 EAs), and Bio Measure 1 and Bio Measures 3–9 would be implemented to avoid or minimize impacts to biological resources.

3.4.3 Avoidance, Minimization, and/or Mitigation Measures

The measures listed below would ensure that minimal to no impacts on sensitive biological resources and vegetation communities result from implementation of the proposed action. These measures were derived from the USFWS informal consultation concurrence letter dated August 17, 2015, the 2005 ADP EA, 2013 Anti-Terrorism Force Protection Measures EA, and other measures identified in relevant regulatory and planning documents for Camp Roberts, POM, and SATCOM.. The U.S. Army consulted with the USFWS for federally listed and protected species to request concurrence with the anticipated impacts and measures that would be implemented prior to and during construction, as

described below. The proposed action will be implemented in compliance with from the USFWS informal consultation concurrence letter dated August 17, 2015, applicable provisions of the *Programmatic Biological Opinion for Multiple Activities at Camp Roberts, San Luis Obispo and Monterey Counties, California (1-8-08-F-24)* and the *Biological Opinion for Normal Operations and Construction Activities in Support of the Satellite Communications Facility at Camp Roberts, San Luis Obispo and Monterey Counties, California (1-8-96-F-25)*, as amended, and with the Camp Roberts and POM INRMPs, as applicable (California Army National Guard 2001, USAG POM 2008). The POM INRMP is currently being updated to include the SATCOM site, and the Camp Roberts INRMP is in the process of being updated. Measures identified in the updated INRMPs may apply to the proposed action if the INRMPs are approved prior to approval of the proposed action and at the discretion of the USAG POM. Bio Measure 1 is a require mitigation. Bio Measures 2 through 9 shall be implemented per agency consultation, permit conditions, Installation management plans, and/or BMPs.

Bio Measure 1: Avoid, minimize, and mitigate impacts on blue oak woodland and native trees (extracted from Bio Measure 1 in the 2013 EA)

This measure is a required mitigation to reduced impacts to less than significant. In accordance with the INRMP for Camp Roberts (California Army National Guard 2001), the following measure will be implemented for the four construction projects to avoid, minimize, and mitigate impacts on native trees that may be affected during construction activities and replace native trees that must be removed or are significantly damaged in the project areas:

- A tree survey will be conducted by an International Society of Arboriculture-certified arborist prior to final design to document the locations of native trees regulated by the Camp Roberts native tree replacement policy. The survey will encompass areas of potential ground disturbance associated with the four projects and adjacent areas where trees may be subject to damage from the ground disturbance. The information will be used during final design to assist in the design and siting of facilities and infrastructure and provide a count of trees that would be subject to the replacement policy. During the design and construction phases, project elements will be located to minimize impacts to native trees.
- During construction activities, no ground disturbance, soil compaction, staging, or vehicle access will be allowed within the dripline of any native trees within project areas and outside the clear zones, unless authorized by the USAG POM. Protective fencing at the dripline (the furthest point from the tree that is covered by the tree crown) will be used to protect native trees with diameters larger than 1 inch or heights of 2 inches or greater, regardless of diameter, during construction activities.
- Fasteners will not be allowed on any trees that are protected in place.

- Excavation or trenches that must be placed within a dripline will be hand-dug, augured, or bored. Major roots (2 inches or greater) shall be avoided whenever feasible. If roots cannot be avoided, all roots larger than 1 inch shall be cut clean.
- When pruning of native trees or cutting of roots larger than 2 inches in diameter is required, it must be done by an International Society of Arboriculture-certified arborist and in accordance with American National Standards Institute standards for arboriculture operations.
- Direct removal of or significant damage to standing native trees (those with diameters larger than 1 inch or heights of at least 2 feet, regardless of diameter) will be subject to the native tree replacement policy, which includes the following:
 - Any native tree (valley oak, blue oak, coast live oak, sycamore, willow, Fremont cottonwood, box elder, big leaf maple, black walnut, or pine) removed will be replaced by planting the same species at a 3:1 ratio (three new trees for every one tree removed) with a monitoring program. Replacement trees shall be one to five gallon (or equivalent) container stock and planted in an area not subject to future activities that would damage or remove them. They will be planted at appropriate densities on the SATCOM property or in areas approved by California Army National Guard. Future plantings may be subject to subsequent NEPA compliance.
 - Replacement trees will be watered at a frequency to ensure survival.
 - Plantings should occur during the appropriate season (e.g., container stock should be planted early on in the rainy season) within 1 year of tree removal.
 - Replacement plantings will be monitored for survival for a period of 3 years.
 - If a 3:1 survivorship ratio (i.e., three surviving trees for each tree removed) is not attained by the end of each year, sufficient numbers of additional trees will be planted and monitored for an additional 3 years until the desired success ratio is attained.
 - As part of the monitoring program, the project proponent will provide an annual monitoring report describing the actions taken, the number of trees planted, and the number of trees remaining alive at the end of the season.
- Leave standing dead trees (snags) and fallen logs (coarse woody debris) when they are not safety hazards. Snags and coarse woody debris serve several important ecological functions. They provide structural habitat characteristics for various plant and animal species, are potentially important in long-term nutrient cycling, and help minimize effects, caused by erosion, to soil and water resources.

Bio Measure 2: Maintain access for San Joaquin kit fox through the security fence around the NRL antenna site (extracted from Bio Measure 2 in the 2013 EA)

Approximately 36 acres of suitable San Joaquin kit fox habitat would potentially be lost between the existing SATCOM fence and the proposed security fence around the NRL antenna site. To minimize the loss of this habitat, 6-inch diameter holes would be placed in the fence at ground level at ridge tops and valley areas where kit foxes are most likely to be moving. Holes would be placed in the new (extended) perimeter fence as well as the existing perimeter fence. These holes would allow kit foxes and other small animals to pass through the facility or utilize habitat within the facility and also escape if they become trapped inside of the fence.

Bio Measure 3: Implement avoidance and minimization measures to protect San Joaquin kit fox and other special-status species that occupy burrows (slightly modified from Bio Measure 3 in the 2013 EA)

The following measures would be implemented, as applicable, to avoid and minimize the potential for injury and mortality of San Joaquin kit fox. These measures were derived from the USFWS informal consultation concurrence letter dated 17 August 2015 and the *Biological Opinion for Normal Operations and Construction Activities in Support of the Satellite Communications Facility at Camp Roberts, San Luis Obispo, California* (1-8-96-F-25), with slight modifications to improve the effectiveness of the measures. Modifications include clarification of the survey area, the timing for preactivity surveys, the qualified biologist requirements, and the guidance to follow for establishing exclusion zones; inclusion of additional requirements for minimizing and avoiding disturbance to dens; and expansion of the worker awareness training requirement. The four construction projects will comply with the Biological Opinion, as updated or amended.

- Conduct preactivity surveys for the presence of kit fox and other special-status animals that may occupy burrows in the project area (e.g., western burrowing owl, American badger) no less than 14 days and no more than 30 days prior to ground-disturbing activities. Surveys will be conducted by qualified biologists in the clear zone and a 150-foot-wide buffer on both sides of the clear zone. The intent of the surveys is to identify active burrows that are used by special-status animals.
- Exclusion zones, or no-disturbance buffers, will be established around dens and active burrows found within the survey area in accordance with the latest guidance from USFWS or CDFW (e.g., *Standard Recommendations for Protection of the San Joaquin Kit Fox Prior to or During Ground Disturbance*, USFWS 2011; *Burrowing Owl Survey Protocol and Mitigation Guidelines*, California Burrowing Owl Consortium 1993). No ground disturbance or vehicle traffic is allowed within the exclusion zones. If an established roadway falls within the exclusion zone, vehicle traffic shall be allowed only if critical need exists and alternate routes are not available. Foot traffic will be allowed for transit only when necessary and alternate routes are not available. If a natal or pupping den is

encountered, USFWS will be notified immediately. Exclusion zones for kit fox will be based on the following criteria:

- Potential or atypical den - 50-foot (15-meter) radius
- Known den - 100-foot (30-meter) radius
- Known natal or pupping den - 200-foot (60-meter) radius
- Potential dens are defined as dens with entrances of sufficient size to allow use by San Joaquin kit foxes (6-inch or greater diameter) and that occur in suitable habitat. Known dens are those that are currently inhabited by kit foxes or where kit foxes have been observed in the past. Known natal or pupping dens are those dens where pregnant females or females with pups have been observed. The exclusion radius is measured from the center of a single den, or from the center of a group of dens.
- Only qualified biologists will conduct preactivity den surveys and other activities that pertain to San Joaquin kit fox. The names and credentials of qualified biologists will be supplied to USFWS for its review and approval at least 30 days prior to the onset of activities that they are authorized to conduct.
- Exclusion zones will be clearly staked, encircled with cord or tape, and flagged. Exclusion zones will be established by a qualified biologist.
- Disturbance to all potential San Joaquin kit fox dens will be avoided to the maximum extent possible. If a kit fox den is discovered within the project area or within 200 feet of the project boundary, work will stop. The den shall not be disturbed. The USAG POM will be notified immediately. USAG POM will immediately notify the USFWS. USAG POM coordinate with the USFWS to determine how to proceed.
- If a kit fox den is discovered, potential kit fox den minimization measures could include the following. In the event that the destruction of a potential den is determined by USAG POM and the USFWS, a biologist qualified to conduct preactivity surveys may only destroy a den after appropriate monitoring; coordination with and approval from the USFWS; and all efforts to avoid den destruction by modifying construction activities have been exhausted. If approved by USFWS, a potential den will be carefully excavated with hand tools by a qualified biologist or under the direction of a qualified biologist before construction begins. If at any point during excavation a San Joaquin kit fox is discovered inside the den, the excavation activity will cease immediately and the USFWS will be notified immediately for further guidance. Destruction of the den may resume when, in the judgment of the qualified biologist and at the direction from the USFWS, the animal has escaped from the partially destroyed den. The den will be fully excavated and then filled with dirt and compacted to ensure that kit foxes cannot reenter or use the den during

the construction period. Destruction of identified dens may require mitigation measures such as installation of replacement dens, as directed by USFWS.

- Construction activities shall be designed to minimize off-road vehicle traffic and be limited to the smallest possible areas of disturbance. Construction personnel should make use of existing roads, trails, and previously disturbed areas whenever possible. Off-road parking and staging areas should be clearly delineated.
- All vehicle traffic is subject to a 25 mile per hour speed limit, except where posted lower. Nighttime construction activities will be avoided.
- To avoid accidental entrapment of animals, the following measures will be implemented:
 - All steep-sided excavations greater than 2-feet deep shall be equipped with one or more earth or plank escape ramps.
 - All excavations will be thoroughly inspected for animals prior to sealing or refilling to avoid accidental burial. Permanent and semi-permanent structures installed in-ground or underground shall be constructed so that animals may not become trapped within.
 - Any pipe, culvert, or similar material with an inside diameter of 4 inches or more shall be thoroughly inspected for animals prior to sealing or reconnection. If animals are found inside the materials, the material will not be removed, or moved only once to remove it from the path of construction activity, until the animals vacate the area. Pipelines temporarily left open in place shall be covered or blocked until work is completed.
- Contour and restoration of disturbed areas shall be performed following conclusion of construction activities. All temporary excavations shall be filled in, contoured, and vegetated where practicable to restore as closely as possible the existing conditions of the site. Permanent and semi-permanent construction will be blended into the surrounding landscape and vegetated where practicable. Local native plant species will be used whenever possible.
- All trash, especially food-related items, will be deposited in closed containers or bags and regularly moved from the site.
- Use of pest control substance, such as rodenticides and herbicides, will be in strict accordance with all Federal, State, local, and Army regulations. In the event that kit foxes are sighted or an active den exists within a 1-mile radius of the SATCOM facility, the Army will use methods of rodent control that have little or no toxicity to kit foxes, such as zinc phosphide or live-trapping, to the maximum extent practicable, particularly during the

pupping season from January 1 to April 30. Aluminum phosphide (phostoxin) should be used only in ground holes where ground squirrels are observed using the target holes.

- All construction crews associated with the proposed action will receive environmental awareness training from a qualified biologist before construction begins. The training will include information on all special-status species that may occur in the project area, their habitat, and the need to protect them. Specifically for San Joaquin kit fox, information on its life history, habitat requirements, and photographs of the species will be provided. A fact sheet conveying this information will be prepared for distribution to all contractors, their employees, and military and agency personnel involved in construction.
- To prevent harassment and mortality of listed species by dogs or cats, pets will not be permitted at the SATCOM site or Camp Roberts at any time. Dogs are only allowed at Camp Roberts if they are used for sheep herding or upland game hunting and must be on post and under strict voice command at all times.

Bio Measure 4: Minimize injury and mortality of San Joaquin kit fox from traffic on East Perimeter Road (extracted from Bio Measure 4 in the 2013 EA)

Traffic levels on East Perimeter Road associated with the SATCOM facility are expected to decrease over the 20-year ADP planning period. While the threat of vehicle strikes along East Perimeter Road will decrease, SATCOM personnel will continue to take measures to avoid and minimize the potential for injury and mortality of kit foxes. The following measures will be implemented as part of the proposed action: SATCOM personnel and contractors working at the facility will be educated regarding the need to adhere to the posted speed limits and to slow or stop vehicles when in proximity to animals near roads.

Bio Measure 5: Avoid potential impacts on vernal pool fairy shrimp (extracted from Bio Measure 5 in the 2013 EA)

In accordance with the *Programmatic Biological Opinion for Multiple Activities at Camp Roberts, San Luis Obispo and Monterey Counties, California (1-8-08-F-24)* and Camp Roberts INRMP (California Army National Guard 2001), the following measures will be implemented for the NRL antenna expansion area, cooling tower discharge system, and NETCOM MET antenna future expansion projects:

- Provide Education to Contractors and SATCOM Staff: Measures implemented to reduce the risk of harming protected species include training by a qualified biologist for all personnel at SATCOM about the presence of threatened and/or endangered species and the Camp Roberts environmental protection measures. Information will be conveyed to contractors and SATCOM employees prior to project initiation. In addition, a pamphlet on vernal pool fairy shrimp will be available and distributed at the SATCOM facility. The flyer or pamphlet will include a brief description, representative photographs, and legal

status of vernal pool fairy shrimp; a description of vernal pool fairy shrimp habitat; the Camp Roberts environmental protection measures for this species including avoiding the placement of obstacles in vernal pool fairy shrimp habitat; and the penalties for not complying with the protection measures. This pamphlet could be combined with information regarding other federally listed species at Camp Roberts.

- Avoid Ground-Disturbing Activities Associated with Training, Maintenance, and Construction during the Wet-Season: To the maximum extent feasible, ground-disturbing training, maintenance, and construction activities will be avoided during the wet season, typically November 1 through April 30. Avoiding ground disturbance during this time period will minimize disturbance, degradation, and destruction of vernal pool fairy shrimp habitat and will minimize the injury and mortality of vernal pool fairy shrimp during their growing and reproductive phase.
- Avoid Cross-County Travel, Especially during the Wet-Season: All military personnel and visitors will be advised to stay on established roads and trails, consistent with CA REG 350-1. Cross-country travel, especially during the wet season, typically November 1 through April 30, will be avoided. This information will be provided to contractors and SATCOM employees during all environmental briefings and will be included in the pamphlet discussed above.
- Conduct Preactivity Survey for Vernal Pool Fairy Shrimp and its Habitat: A qualified biologist will conduct preactivity surveys prior to any activities that involve grading, excavation, or the stock piling of dirt or materials (any new construction) to determine the potential for the activity to affect vernal pool fairy shrimp. The project area and an appropriate buffer zone will be surveyed. The survey results will be documented in a report that includes a map of the project area showing the location of sensitive species sites and recommendations for avoidance. If vernal pool fairy shrimp are found during surveys and affects to the species or habitat cannot be avoided, work will stop and the POM will re-initiate coordination with the USFWS. The U.S. Army will ensure that all workers and equipment operators are informed of the results and areas to be avoided. Areas to be avoided will be flagged; flagged sites and exclusion zones are off limits to personnel and equipment. Only the qualified biologist will be able to remove flags and exclusion zones after completion of the project.
- Contour and restoration of disturbed areas shall be performed following the conclusion of project or activity. All temporary excavation shall be filled in, contoured, and vegetated where practicable to restore as closely as possible the existing condition of the site.

Bio Measure 6: Prevent the spread of invasive plants (extracted from Bio Measure 6 in the 2013 EA)

To prevent the introduction or spread of invasive plants in the project area, the following measures will be implemented during construction activities for each project:

- Educate construction personnel on the importance of controlling and preventing the spread of invasive weeds. This can be addressed during an environmental orientation/briefing that all personnel should get prior to conducting any work at the SATCOM facility.
- Wash construction vehicles and equipment off-site before entering the project area, including prior to re-entry if vehicles or equipment leave the project area prior to the end of the construction period.
- Use erosion control materials (e.g., straw wattles) that are certified weed-free.
- Restore temporarily disturbed grassland areas with annual and perennial grasses that are native to the Camp Roberts region.

Bio Measure 7: Conduct preactivity survey for special-status plants (extracted from Bio Measure 7 in the 2013 EA)

A preactivity survey will be conducted by a qualified botanist for the special-status plants listed in Section 3.4.1 in this EA. The survey will be conducted in suitable habitat at each individual project area prior to ground disturbing activities and preferably during the blooming period of the species prior to construction, which may require multiple visits between March and August to cover each species' blooming period. If the survey cannot be conducted during the blooming period, the botanist shall use the survey to identify areas where the species are most likely to occur and conduct a site-specific assessment to determine suitability of the habitat for each species. If populations or individuals of any special-status species are identified during the survey or are highly suspected to occur in the project area, the U.S. Army will coordinate with the USFWS or CDFW to determine appropriate avoidance or minimization measures. Such measures may include relocating facilities or realigning the clear zone or work area to avoid the plant(s) or transplanting plant(s) to suitable habitat elsewhere at Camp Roberts (if determined feasible). For the federally listed purple amole, measures identified in the *Programmatic Biological Opinion for Multiple Activities at Camp Roberts, San Luis Obispo and Monterey Counties, California (1-8-08-F-24)* will apply if the plant is identified or highly suspected to occur in the project area based on the preactivity survey.

Bio Measure 8: Conduct a preactivity survey for nesting migratory birds and roosting bats (extracted from Bio Measure 8 in the 2013 EA)

A preactivity survey will be conducted by a qualified wildlife biologist for nesting birds and roosting bats prior to each project. The nesting bird survey will be necessary if construction activities are scheduled during the nesting period (February through September); the roosting bat survey is necessary regardless of the construction schedule. The survey will be conducted within 10 days prior to any tree

removal activities or the start of construction activities that could disturb nesting birds or roosting bats, whichever is scheduled first. The survey will be repeated if no activity takes place for more than 10 days at a time. The survey area will encompass the project area and a 500-foot buffer around the project area. All habitat within the survey area will be assessed to identify active bird nests, including identification of the species nesting, and active bat roost sites. Surveys for bats should include visual inspection to identify potential suitable bat roosting habitat in trees slated for removal followed by daytime visual assessments and evening visual searches of emerging and free flying bats. For golden eagles, the survey will be conducted in accordance with the guidelines in the *Interim Golden Eagle Inventory and Monitoring Protocols; and Other Recommendations* (Pagel et al. 2010), and if golden eagle nests may be disturbed, incidental take authorization under the Bald and Golden Eagle Protection Act (50 CFR Section 22.26) will be requested from the USFWS. If no active nests or roost sites are detected during the survey, no additional measures are necessary.

If an active nest or roost site is found in any tree scheduled for removal, tree removal will not commence until the nest is determined to be no longer active or the roost site is properly evacuated, as described below. Trees should be removed outside of the nesting season for birds (February through September) to avoid removal of active nests and outside of the breeding season for bats (April to September) to avoid disturbance to maternal colonies.

- The preferred procedure is to cut down or break up potential roost trees/snags/stumps one half hour after sunset when bats are likely to have emerged for the evening.
- If potential roost trees/snags/stumps must be removed during the day, they should be cut down on warm days in late morning to afternoon when any bats present are likely to be warm.
- Prior to tree removal, create noise and vibration disturbance on the tree (e.g., concussive hitting with equipment and/or chainsaw cutting) for at least 15 minutes before carefully opening up potential crevices and cavities for inspection and clearance.
- If bats may be in a tree hole or heavy branch cavity, attempt to expose them to allow them to escape. For example, if the cavity cannot be investigated by a biologist, then carefully cut successive sections above the cavity to open it, waiting up to 10 minutes in between each cut, and determine if it is empty or allow any bats inside to crawl or fly out.
- If bats may be in branches that can be removed from the tree and set aside, cut the branches off intact and set them upright against trees away from the construction area to allow any bats present to passively escape.

If an active nest or roost site is found in the survey area outside a tree scheduled for removal, a no-disturbance buffer will be established around the site to avoid disturbance until the end of the bird

breeding season (September 30) or until a qualified wildlife biologist determines that the young have fledged and left the nest (this date varies by species) or that the roost site is no longer active. The extent of the buffer will be determined by the biologist in coordination with USFWS or CDFW and will depend on the level of noise or construction disturbance anticipated near the site, the line-of-sight between the nest and the disturbance, and the presence of topographical or artificial barriers. Suitable buffer distances may vary between species. If an active roost site is identified in or immediately adjacent to a work area, the biologist may, upon authorization from USFWS or CDFW, establish a one-way barrier at the opening to allow the bats to leave the roost during nighttime hours, but not return to the site.

Bio Measure 9: Design nighttime lighting to minimize illumination.

All nighttime lighting needed for any of the projects will be designed in accordance with Camp Roberts lighting policies and with consideration for minimizing illuminated areas. To the extent possible, perimeter and other high intensity security lighting should be shielded to avoid spill over lighting to adjacent areas (per Matrix Design Group 2013). The following design measures should be considered to minimize lighting impacts on bats (from Bat Conservation Trust 2009):

- Do not direct light toward known bat roosts to avoid directly illuminating the roosts.
- Use lights with less than 2,000 lumens (150 Watts) to minimize disturbance to bats and other wildlife.
- Use a low pressure sodium lamp or high pressure sodium lamp with glass glazing to minimize ultraviolet lighting, which attracts insects.
- Use hoods, cowls, louvres, or shields to direct light to the intended area only and avoid light spillage.
- To the extent possible, use shorter lighting columns or direct light from taller columns downward at a more acute angle to reduce horizontal spill.
- To the extent possible, use movement sensors or timers to minimize the amount of time the lights are on at night.

3.5 CULTURAL RESOURCES

3.5.1 Existing Conditions

The SATCOM site, along with the surrounding Camp Roberts, is on land that is associated with the federally recognized Santa Ynez Band of Chumash Indians. Prehistoric sites at Camp Roberts are typically found near freshwater sources, such as the Salinas and Nacimiento Rivers, based on prior studies conducted at the SATCOM site. Recorded sites display evidence of a broad spectrum of subsistence resources typical of a hunter-gatherer diet. This type of diet relied on a variety of plant

resources, terrestrial animals, and freshwater fish and shellfish, and typical tools included various groundstone implements, bone and shell tools, and bows and arrows (Hester 1978, Jones and Stokes 1996). Evidence of trade between inhabitants of this area and those of the coast exists in the excavated remains of marine resources (Breschini and Haversat 1988, Hester 1978, and U.S. Army 2005).

A cultural resources inventory, which included background and archival research and a field survey, was completed for the proposed action in compliance with Section 106 of the NHPA (North State Resources, Inc. 2014b). No archaeological sites or historic resources were identified in the project area; however, a cultural resource site (NSR-CR-01), which is a concentration of seven shallow depressions with associated steel pipe/bracket features, and three isolates were documented near the project area. The isolates (NSR-CR-ISO-01, NSR-CR-ISO-02, and NSR-CR-ISO-03) consist of, respectively, an excavated pit or “foxhole,” a scatter of food/beverage tins, and a single M6 ammunition tin. Section 106 consultation with the California SHPO and Tribe has been initiated for the proposed action by the USAG POM, as discussed in Section 1.4 (Agency and Public Participation).

3.5.2 Environmental Consequences

No-Action Alternative

Implementation of the projects would not occur. No ground disturbance would take place, and no cultural resources would be affected.

Proposed Action

The construction projects would involve ground disturbance on up to 9.5 acres of land and could disturb buried, previously undiscovered cultural resources. The proposed parking lot and existing roads have a low potential to contain cultural resources because of their existing disturbed nature. The other projects are in less disturbed areas and could contain buried resources, although the potential is still considered relatively low because no cultural resources have been documented in the project area as a result of the current or previous investigations (North State Resources, Inc. 2014b). No historic properties have been recorded in the project area, and none would be affected during construction activities. The cultural resource site and isolates documented near the project area would not be affected. Measures identified in the POM and Camp Roberts ICRMPs, as applicable, will be implemented in the event of a discovery of cultural or paleontological resources or human remains during construction activities. The USAG POM has initiated Section 106 consultations for the proposed action with the SHPO and Santa Ynez Band of Chumash Indians. A Native American advisor/consultant will be present during ground-disturbing activities, and additional measures may be identified in consultation with the Tribe in the event of an inadvertent discovery of cultural resources during construction activities (see Cultural Measure 1 below). The SHPO concurred with the USAG POM’s finding that no historic properties will be affected (a copy of the letter is in Appendix A).

3.5.3 Avoidance, Minimization, and/or Mitigation Measures

The measure listed below, which is derived from the 2013 EA (U.S. Army 2013), in combination with inadvertent discovery requirements of the POM and Camp Roberts ICRMPs would ensure that minimal to no impacts on cultural resources result from implementation of the proposed action. Cultural Measure 1 shall be implemented per agency consultation, permit conditions, Installation management plans, and/or BMPs.

Cultural Measure 1: Monitor ground disturbance

A Native American advisor/consultant will be present during ground-disturbing activities associated with the proposed action, in response to requests from the Santa Ynez Band of Chumash Indians during consultations on the proposed action and other projects at the SATCOM site. Additional measures may be identified during consultation with the Santa Ynez Band of Chumash Indians in the event of an inadvertent discovery of cultural resources during construction activities.

3.6 HAZARDS AND HAZARDOUS MATERIALS

3.6.1 Existing Conditions

General hazards and hazardous materials associated with the SATCOM site are described in the previously prepared EAs (U.S. Army 2005, 2010). No hazardous materials are currently stored or used in the project area. Hazardous materials are currently stored and used within the SATCOM facility (U.S. Army 2010). Hazardous waste materials generated or stored onsite include waste oil, battery electrolytes, spent solvents, paint waste, cooling tower fluids, explosives, and pesticide and herbicide rinse water. Diesel fuel is stored near the industrial section of the facility.

Safety hazards associated with natural causes (e.g., wildfire) and activities at the SATCOM facility and Camp Roberts pose a threat to humans at and near the existing SATCOM facility. Wildfires can occur during any month of the year, but May through October is typically considered to be the period of high fire hazard (U.S. Army 2005). Fires can result from activities that produce sparks such as welding, use of off-road construction equipment with defective exhaust systems, and use of vehicles equipped with catalytic converters in areas of tall grass. A firebreak to control the spread of wildfire surrounds the SATCOM facility along the existing perimeter fence.

The SATCOM site is located in an isolated portion of Camp Roberts. Two types of training activities are conducted at Camp Roberts: live fire exercises and field training exercises. Live fire exercises involve the use of live ammunition or ordnance (U.S. Army 2010). These activities do not take place near the SATCOM site. Unexploded ordnance or other hazards associated with Camp Roberts training activities are not expected to pose a threat to humans within the project area.

3.6.2 Environmental Consequences

No-Action Alternative

Existing hazardous materials storage and use and other hazards at the SATCOM site would remain unchanged. Construction activities would not expose personnel to hazardous materials. Accidental fires or wildfires would continue to be managed by maintaining the firebreaks along the existing security fence. No new hazards would be introduced because the four construction projects would not be implemented.

Proposed Action

During construction activities for each project, hazardous materials such as gasoline, diesel fuel, oil, paint, or paving materials may be used. These hazardous materials could be released into the environment through leaks or spills, resulting in the potential contamination of soils or water and exposure of humans to hazardous materials. If the projects were constructed at the same time, the potential for hazardous material spills would be the same, but the collective impact of multiple spills at the same time could be greater. The construction contractor(s) would be required to comply with state and federal occupational safety and health codes and regulations and to review and keep a record of material safety data sheets for site materials in accordance with U.S. Army protocols. In addition, implementation of Haz Measure 1 for each project would minimize the potential for hazardous waste spills and ensure proper cleanup of any spills.

During construction of the four projects, a fire could be accidentally ignited as a result of the generation of sparks from activities such as welding, use of off-road construction equipment with defective exhaust systems, and use of vehicles equipped with catalytic converters in areas of tall grass. If the projects were constructed at the same time, the potential for fire would increase, and if a fire was accidentally ignited it could be greater. Because of the fire hazard of the region and the surrounding annual grasslands, a fire could easily ignite and spread quickly, resulting in damage to structures at the SATCOM facility or loss of vegetation or other resources in and near the project area. Haz Measure 2 would be implemented during construction activities for all projects to minimize the potential for construction-related fires. Operation of the four projects would have a similar risk of fire as the existing SATCOM facility. The firebreak around the security fence associated with the NRL antenna site would help prevent the spread of wildfire onto or out of the facility and protect facilities at the SATCOM site.

The crossing of Perimeter Road from the parking lot to the SATCOM facility poses a safety hazard for pedestrians accessing the turnstile to get into the facility. The curve of the road leading up to the parking lot could prevent vehicles from seeing them. The parking lot project includes lighted flashing warning signs ahead of the crosswalk in each direction of travel, which would alert travelers of the crossing and reduce the safety hazard to pedestrians.

Unexploded ordnance is not expected to be an issue in the project area. Nonetheless, implementation of Haz Measure 3 would ensure that potential impacts from unexploded ordnance would be avoided.

Hazardous materials, such as fuels or lubricants, may be required for long-term operations and maintenance of facilities associated with the NRL antenna site, new security fence, and NETCOM MET antenna site. These hazardous materials would be properly handled, stored, and disposed to prevent their release into the environment. Operation of the parking lot would not require the use of hazardous materials; however, the long-term parking of vehicles at the parking lot and in other areas of the project area has the potential to release oil through leaks. While the infiltration gallery would not require the use of hazardous materials, wastewater would be entering it during operation, as discussed in Section 3.13, Water Resources. Implementation of Haz Measure 1 would help reduce the potential for hazardous material spills from occurring in the project area and ensure that if a spill does occur, it is properly cleaned up.

Additional safety hazards could result from the new electrical lines and the possibility of antennas becoming dislodged, such as in the event of an earthquake or from soil hazards (see Section 3.10.2 for soil-related impacts). While these hazards are present, the likelihood of them causing human harm is minimal. Also, the design of all facilities will consider applicable safety hazards and design guidelines to ensure the facilities are stable and secure.

3.6.3 Avoidance, Minimization, and/or Mitigation Measures

Haz Measures 1 through 3, which are derived from the 2010 EA, as well as Water Measure 1, would minimize adverse hazard- and hazardous materials-related effects during construction of the projects. Haz Measures 1 through 3 shall be implemented per agency consultation, permit conditions, Installation management plans, and/or BMPs.

Haz Measure 1: Prevent and clean up spills

Lids shall be affixed to all containers containing hazardous materials to prevent spilling of hazardous wastes. Accidental spills of hazardous material would be cleaned up immediately.

Haz Measure 2: Utilize spark arrests on construction equipment and prohibit smoking in the construction area

To avoid and minimize the potential for fires, construction equipment shall be equipped with spark arresters maintained in effective working order, unless the engine is constructed, equipped, and maintained for the prevention of fire pursuant to Public Resources Code Section 4443. In addition, the construction contractor should prohibit smoking in the project area during construction to reduce the chance of igniting a fire that could damage biological resources and structures at the SATCOM site.

Haz Measure 3: Provide training on unexploded ordnance

Construction personnel working in areas where unexploded ordnance may be present should receive training on identifying unexploded ordnance and the appropriate response if such material is found during the course of construction.

3.7 INFRASTRUCTURE

3.7.1 Existing Conditions

Existing infrastructure in the project area includes unpaved and paved roads, underground utility lines that follow some of the roads, and a discharge pipeline that follows a hill off the southwest side of the SATCOM facility from the cooling towers into the project area. No other infrastructure is present in the project area. Existing infrastructure at the SATCOM facility includes the existing perimeter fence and associated security lighting around the facility; telecommunications, water, and electricity lines; and roads and parking areas throughout the SATCOM site. A series of pipes collect stormwater runoff from the facility and carry the water off site (U.S. Army 2005). Release points are immediately outside the existing perimeter fence. The SATCOM facility contains several large communication antennas that support operations. Additional details on the infrastructure and utilities at the SATCOM site are described in the 2005, 2010, and 2013 EAs.

3.7.2 Environmental Consequences

No-Action Alternative

Without implementation of the four construction projects, infrastructure in the project area would remain unchanged. The SATCOM facility would not contain the infrastructure needed for the U.S. Army to fulfill its mission at the SATCOM facility and maintain communications facilities in accordance with the latest technology.

Proposed Action

Temporary disruptions to existing service lines may be necessary during installation and connection of the new electrical and communications lines for the four projects, but such disruptions would be limited to operations at the SATCOM facility and would be coordinated with workers and activities that require the services to minimize adverse impacts (e.g., scheduled outside of normal business hours to the extent feasible). Installation of the underground conduits and lines could require the relocation of other utility lines under existing roads in the project area; the locations of known lines would be marked prior to trenching activities to avoid the lines to the extent feasible. Access throughout the project area is expected to be maintained during construction of each project (i.e., no road closures are expected). Construction activities could require temporary road detours or closures and the closure of the parking lot during improvements. This could cause temporary delays for people trying to pass through the project area. Parking would be available elsewhere at the SATCOM facility during the construction of the parking lot. If the projects were constructed at the same time, disruption to existing service lines

and road detours or closures could be longer and more widespread, although they would still affect few people and cause minimal collective disruptions.

The discharge system for the cooling towers is expected to be shut off during pipe replacement and installation of the infiltration gallery. The shut off would be scheduled when the cooling towers are not operating to avoid impacts. The overall effect of the cooling tower project would be positive as it would improve the infrastructure and functionality for that system.

The NRL antenna expansion site and NETCOM MET antenna expansion site would improve communication infrastructure at the SATCOM facility and would assist the U.S. Army in fulfilling its mission to maintain communications facilities at the SATCOM site in accordance with the latest technology. Furthermore, these antenna expansion sites would allow the expansion of the SATCOM facility by providing additional areas for the U.S. Army to expand its communications facilities to respond to new technologies and accommodate additional communications needs. The new security fence would connect to the existing fence and to the proposed fence analyzed in the 2013 EA while protecting the NRL antenna expansion site and meeting Army Regulations and the Field Manual (FM 3-19.30) for Physical Security. The establishment of additional access roads to the antenna expansion sites and a parking lot would improve transportation infrastructure at the SATCOM facility. Utility extensions including telecommunications, water, and electricity lines would be connected to existing lines and would ensure that the new facilities have the proper supporting infrastructure to successfully function.

Avoidance, Minimization, and/or Mitigation Measures

No measures are necessary for infrastructure-related impacts.

3.8 LAND USE

3.8.1 Existing Conditions

Camp Roberts is located in central California in the southern portion of the Salinas River Valley. The majority of the area bordering Camp Roberts is undeveloped and is primarily used for agriculture, rural residential developments, and recreation (U.S. Army 2010). The closest communities to the installation are San Miguel, about 4 miles southeast of the main gate in San Luis Obispo County, and Bradley, about 7 miles northwest of the main gate in Monterey County. Paso Robles, 11 miles southeast of the installation, is the largest nearby town.

The SATCOM site is located near the southeastern border of Camp Roberts on Perimeter Road (Figure 1). Most of the land surrounding the SATCOM facility is used for military training activities at Camp Roberts. The SATCOM facility was established in the early 1960s to operate and maintain satellite

ground terminals, technical control facilities, and a telecommunication center (California Army National Guard 2001).

The SATCOM facility's existing security fence currently surrounds two main hills. The southern hill contains operations buildings, communications antennae, a machine shop, substations, a utility building, propane tanks, a Ka-band terminal, and parking lots (U.S. Army 2010). The northern hill has a smaller operational area and an industrial area that contain teleport terminals and dishes, a water tank and pumps, a substation, and an equipment shelter. An industrial area (powerhouse, utility building, and two warehouses) and a fitness center are also located on the site. A dirt lot is currently used for overflow parking on the east side of Perimeter Road, south of the main SATCOM entrance. A westward expansion on approximately 57 acres has been proposed and evaluated as part of the ADP EA (U.S. Army 2005). This expansion would allow implementation of various long-range projects that focus on providing enhanced capacity and growth areas for new technologies as they are developed and implemented as part of the mission for the site. Land uses that previously occurred in the westward expansion area, but no longer occur include sheep grazing and hunting (U.S. Army 2005). Additional details on land use at the SATCOM site are described in the 2005 and 2010 EAs.

The project area is used primarily as open space and contains roads, a dirt parking lot, and the existing cooling tower discharge site. The NRL antenna site would be located south of the existing SATCOM facility and the NETCOM MET antenna site would be located in the westward expansion area. The proposed parking lot and infiltration gallery would be located where the existing dirt parking area and wastewater discharge site are currently located, respectively.

3.8.2 Environmental Consequences

No-Action Alternative

Without implementation of the four construction projects, land uses in the project area would remain unchanged. The SATCOM facility would not be expanded, and the U.S. Army would not be able to provide for long-term growth and expansion of the SATCOM facility to respond to new technologies and accommodate additional communications needs associated with an enhanced mission definition and modernized equipment systems.

Proposed Action

Temporary disruptions to land uses in the project area and at the SATCOM facility may occur during the construction of each project. These land use disruptions could be caused by excessive noise, reduced air quality, detours and delays along roads, the closure of the dirt parking area, and the interruption of services during utility installations. These impacts are discussed in other sections of this EA and are summarized below for each project, and measures are identified in the other sections, where appropriate, to reduce potential adverse impacts. If the projects were constructed at the same time, the

temporary disruptions to land uses would be greater due to increased issues with access at the SATCOM facility and increased general use of the project area during construction activities.

Land uses across most of the project area would permanently change as a result of the projects. However, the proposed action would assist the U.S. Army in fulfilling its mission of the SATCOM facility and would allow the expansion of the SATCOM facility, which would provide additional area for the U.S. Army to expand its communications facilities to respond to new technologies and accommodate additional communications needs. Land use impacts for each project are discussed below.

Project 1: SATCOM Expansion to South for NRL Antenna

Construction of the project would temporarily disrupt land uses in the project area, at the SATCOM facility, and adjacent areas. Impacts discussed in the Noise and Air Quality sections of this chapter could affect personnel at the SATCOM facility, temporarily disrupting operations. In addition, temporary interruptions of utility services, as discussed in the Infrastructure section, could also disrupt operations at the SATCOM facility. Project impacts related to road detours and delays, as discussed in the Infrastructure and Transportation sections, could temporarily restrict access and limit the use of the project area, the SATCOM facility, and Perimeter Road. Measures are identified in the other resource sections to reduce or avoid construction-related impacts and minimize disruptions and disturbances during construction activities.

The NRL antenna site and associated access routes would result in the conversion of up to 1.5 acres of open space to the south of the existing SATCOM facility. The establishment of a new security fence and clear zone would result in the conversion of up to 3.1 acres of open space. The new NRL antenna site and security fence would be highly compatible with the existing SATCOM facility and would assist the U.S. Army in fulfilling its mission to maintain communications facilities at the SATCOM facility in accordance with the latest technology.

Project 2: NETCOM Parking Lot along Perimeter Road

Establishment of the parking lot would temporarily disrupt uses in the project area through the temporary closure of the parking lot during improvements. Project impacts related to road detours and delays, as discussed in the Infrastructure and Transportation sections, could temporarily restrict access and limit the use of the project area, the SATCOM facility, and Perimeter Road; however, these impacts would affect few people and would be temporary.

No land use changes would occur as a result of the project. The proposed parking lot would be constructed on land already used as a parking lot and would improve the parking availability at the SATCOM site.

Project 3: Discharge System for Cooling Towers

Installation of the infiltration gallery would not be expected to affect uses at the SATCOM facility or disrupt daily activities or operations. Construction activities at the discharge location would not cause noise, air quality, or other disturbances to personnel at the SATCOM facility due to its distance from the facility and surrounding hills and vegetation. As discussed in the Infrastructure section, the cooling towers operations would not be disrupted during construction.

No land use changes would occur as a result of the project. The infiltration gallery would be constructed in an area already utilized for wastewater discharge.

Project 4: NETCOM MET Site Future Expansion Area

The location of this project is in the westward expansion of the SATCOM site, which was previously evaluated in the 2005 ADP EA (U.S. Army 2005). In addition, the MET site expansion area is within an area proposed for fencing, and the effects of fencing the area around the MET site were evaluated in the 2013 EA (U.S. Army 2013). Land use impacts and measures discussed in those EAs were incorporated into this analysis, to the extent applicable.

Construction of the project would result in similar disturbances and disruptions as those described for the construction of the NRL antenna facility above. Use-related impacts would be minimized with implementation of measures identified in other resource sections.

The proposed antenna site would result in the conversion of up to 3.8 acres of open space to the west of the existing SATCOM facility, although disturbance within that area would be limited to the maximum necessary to level the ridgeline and install the antennas and associated facilities. As discussed in the 2005 EA, military training that occurs at Camp Roberts could be restricted as a result of project implementation. However, it is unlikely that these uses occur very frequently in the immediate vicinity of the SATCOM facility, and the project would not substantially limit these activities. The new antenna site would be highly compatible with the existing SATCOM facility and would assist the U.S. Army in fulfilling its mission to maintain communications facilities at the SATCOM facility in accordance with the latest technology.

3.8.3 Avoidance, Minimization, and/or Mitigation Measures

Air Measures 1 through 6 and Noise Measures 1 and 2, listed in the Air Quality and Noise sections of this chapter respectively, would reduce temporary use disruptions during construction activities for each project. Air Measures 1 through 6 and Noise Measure 1 and 2 shall be implemented per agency consultation, permit conditions, Installation management plans, and/or BMPs.

3.9 NOISE

3.9.1 Existing Conditions

Because of its remote location, the SATCOM site is isolated from typical residential and commercial sources of noise. The surrounding land is used for military training. Training activities from Camp Roberts operations can occasionally be heard at the site (U.S. Army 2010). Sources of noise within the SATCOM facility include vehicles, generators, pumps, motors for air conditioning units, and a machine shop. Sources of noise within the project area include vehicles, overhead electrical lines, and wastewater exiting the cooling tower pipeline. Noise from SATCOM facility operations and vehicles traveling along Perimeter Road can be heard from the project area. The only sensitive receptors near the project area are personnel and contractors that work at the SATCOM facility. No other sensitive receptors, such as schools, houses, or hospitals, exist near the SATCOM site. Additional details on the noise environment at the SATCOM site are described in the 2005 and 2010 EAs.

3.9.2 Environmental Consequences

No-Action Alternative

Without implementation of the four construction projects, no construction-related noise from the projects would be generated, and ambient noise levels in the project area would be the same as current conditions.

Proposed Action

Heavy vehicles and equipment would be used during construction activities for each project to prepare the sites and install new facilities. Increased noise during construction could be noticeable to SATCOM personnel and others near the work area. Hearing damage could result from excessive sound exposure for people near the work area. Because most SATCOM personnel and contractors work inside at the SATCOM facility, the majority would not be exposed to excessive sound levels. Topography and vegetation would also help mask noise during some construction activities, such as the infiltration gallery, which is at a lower elevation than the SATCOM facility and is surrounded by hills and oak woodlands. Noise from the antenna expansion sites would likely be more noticeable because they are located on hilltops where noise can travel greater distances. If the projects were constructed concurrently, more noise would be generated at the same time and would be more noticeable to personnel and contractors. Noise Measures 1 and 2 would be implemented during construction activities for all projects to minimize noise impacts to personnel and contractors that work at or near the construction areas. Construction-related noise would not affect other sensitive receptors such as residences, schools, and hospitals because they are not located near the project area. Effects from construction noise associated with the proposed action would be temporary and minor.

Upon completion of the proposed action, operational noise would be similar to the existing noise generated by the SATCOM facility, which is caused by vehicles, facility operations, and personnel.

3.9.3 Avoidance, Minimization, and/or Mitigation Measures

Noise Measures 1 and 2, modified from the 2010 EA, would minimize adverse noise-related effects during construction of the projects. Noise Measures 1 through 2 shall be implemented per agency consultation, permit conditions, Installation management plans, and/or BMPs.

Noise Measure 1. Provide earplugs if necessary

If necessary or requested, earplugs should be provided by the U.S. Army to SATCOM personnel that work outside near the work area to avoid exposure to excessive sound during construction.

Noise Measure 2. Limit construction hours

Construction should take place Monday through Friday between 0700 and 1700 hours to the extent practicable while also considering disruptions that may occur during the day (e.g. service line disruptions, access and parking).

3.10 SOIL RESOURCES

3.10.1 Existing Conditions

General soil conditions of the SATCOM site are described in the 2005 EA. Soils at the SATCOM site and in the project area include Nacimiento-Los Osos complex, 30 to 50 percent slopes, and Balcom-Nacimiento association, steep (Natural Resources Conservation Service 2013). These soils formed from weathered sandstone and shale and are shallow to moderately deep on steep slopes. They are composed of clay loams to shale clay loams, which cause high shrink-swell potential, and are well to excessively well drained. The soils have high erosion potential, particularly from water, which is evident where discharge water from the cooling towers has eroded gullies in the southwestern portion of the project area. The hill slopes surrounding the NRL antenna site and the NETCOM MET antenna site are steep, which increases the potential for slope failure or hazards, and have moderate vegetative cover, which helps protect the soils from erosion. The existing parking lot contains exposed soils, which have been disturbed and may be subject to erosion.

3.10.2 Environmental Consequences

No-Action Alternative

Without implementation of the four construction projects, no soil disturbance would take place in the project area. Soils in the project area would continue to be exposed to natural wind and water erosion, and soil conditions would be the same as current conditions.

Proposed Action

Construction activities such as vegetation removal and leveling of topography would disturb soil and could result in increased soil erosion or hill slope destabilization. Vegetation removal would expose soils to increased erosion potential, particularly during periods of high winds and precipitation events. Because of the extent of steep slopes in the antenna sites and the security fence clear zone, the leveling of those project areas would result in a large amount of soil disturbance, which could result in eroded sediment entering nearby drainages or increased fugitive dust, as discussed in other sections. If the projects were constructed at the same time, impacts to soil resources would be similar compared to the impacts of constructing the projects separately because the overall amount of soil disturbed would remain the same. If construction is scheduled outside of the wet season, the potential for water-related erosion would be substantially reduced. Soil resources impacts for each project are discussed below.

The amount of cut and fill necessary for the proposed action has not been estimated, but they would be balanced across the projects. Soil excavated for the trenches would be used to backfill the trenches. Off-site haul truck trips for transport or disposal of soil would not be necessary.

Project 1: SATCOM Expansion to South for NRL Antenna

The construction of the NRL antenna facility, associated access routes, and establishment of additional fence line would require vegetation removal and disturb up to 4.6 acres of soil, including leveling of the hilltop and security fence clear area. Soils in the project area are highly susceptible to erosion, and vegetation removal would expose soils to increased erosion potential, particularly during periods of high winds and precipitation events. Because of the extent of steep slopes in the project area, these activities would result in a large amount of soil disturbance, which could result in eroded sediment entering nearby drainages, increased fugitive dust, or increased slope instability. Slope stability could be decreased if cut-and-fill slopes are not suitable for the conditions or because of the occurrence of landslides, soil creep, and adverse bedrock layering. Grading, construction, the addition of water to slopes, or combinations of these activities may reactivate ancient landslide deposits. Implementation of Geo Measures 1 through 4, as well as Water Measure 1, would minimize the potential for soil erosion and protect the soils in the project area during construction.

Soils in the project area could also shrink and swell during and after precipitation events, resulting in possible damage to structures. The project components would be designed to accommodate the existing soil conditions, and shrink-swell effects from the soils would have a negligible effect on the structures.

Project 2: NETCOM Parking Lot along Perimeter Road

Establishment of the proposed parking lot would disturb less than 1 acre of soil in a previously disturbed area, resulting in a low potential for erosion-related impacts. Minimal vegetation removal would be needed where herbaceous plants have grown on the existing lot. The compacted aggregate base course, asphalt/chip seal, or a similar parking surface would reduce the potential for soil erosion to occur over the long term. Shrink-swell soils are not expected to affect the parking lot.

Project 3: Discharge System for Cooling Towers

The construction of the infiltration gallery would require some low-growing or herbaceous vegetation removal and would disturb about 0.5 acre of soil. Soils in the project area are currently exposed as a result of severe gully erosion from the existing discharge system. Vegetation removal and soil disturbing activities during construction could result in increases in erosion and cause sediment to discharge into the drainage. Implementation of Geo Measures 1 through 3 would minimize the potential for soil erosion and protect the soils in the project area during construction. The establishment of a new discharge system would greatly reduce soil erosion at the site over the long term. The discharge system would be designed with consideration for possible shrink-swell effects.

Project 4: NETCOM MET Site Future Expansion Area

The construction of the NETCOM MET antenna facility would require vegetation removal and disturb up to 3.8 acres of soil, including leveling of the hilltop. The location of this project is in the westward expansion of the SATCOM site, which was previously evaluated in the 2005 ADP EA (U.S. Army 2005). In addition, the MET site expansion area is within an area proposed for fencing, and the effects of fencing the area around the MET site were evaluated in the 2013 EA (U.S. Army 2013). Soil resources impacts and measures discussed in those EAs were incorporated into this analysis, to the extent applicable.

Soil impacts would be similar to those described for the NRL antenna project. Vegetation removal would expose soils to increased erosion potential, particularly during periods of high winds and precipitation events. Because of the extent of steep slopes in the project area, these activities would result in a large amount of soil disturbance, which could result in eroded sediment entering nearby drainages, increased fugitive dust, or cause slope instability. Slope stability could be decreased if cut-and-fill slopes are not suitable for the conditions or because of the occurrence of landslides, soil creep, and adverse bedrock layering. Grading, construction, the addition of water to slopes, or combinations of these activities may reactivate ancient landslide deposits. Implementation of Geo Measures 1 through 4, as well as Water Measure 1, would minimize the potential for soil erosion and protect the soils in the project area during construction.

3.10.3 Avoidance, Minimization, and/or Mitigation Measures

Geo Measures 1 through 4, as described in the 2005 and 2013 EAs, as well as the implementation of Water Measure 1, would minimize adverse soil-related effects during construction activities. Geo Measures 1 and 2 shall be implemented per agency consultation, permit conditions, Installation management plans, and/or BMPs. Geo Measures 3 and 4 are required mitigations.

Geo Measure 1: Clearing procedures

The following measures would be implemented for the NRL antenna expansion area, cooling towers discharge system, and NETCOM MET future expansion projects. To the extent possible, the temporary

working area should be limited to the minimum area necessary for construction activities. Topsoil should be removed and stockpiled for use during site restoration. In sensitive areas, construction equipment should be used that minimizes surface disturbance, soil compaction, and loss of topsoil. Such equipment includes low ground pressure tracks or tires, blade shoes, and brush rake attachments. Steep, erodible slopes should not be pre-cleared until construction activities are to be carried out on these slopes immediately thereafter.

Geo Measure 2: Backfilling, trenching, and grading activities

The following measures would be implemented for the NRL antenna expansion area, cooling towers discharge system, and NETCOM MET future expansion projects. General and site-specific measures should be implemented to minimize the effects of grading, trenching, and backfilling; to enhance rehabilitation; and to minimize erosion. These measures include the following:

- graded areas should be the minimum size required for construction activities;
- the time between trenching and backfilling should be minimized;
- backfilling should commence immediately after lowering-in; and
- after final grading, all compacted areas should be lightly disked or raked before reseeded.

After the completion of backfilling, all disturbed areas (including the permanent easement, temporary workspace, temporary access roads, and stockpile sites) should be restored to approximately the original grade. Any excessively steep cuts that are unstable should be graded back to an acceptable slope or retaining walls installed. Topsoil stockpiled during initial site excavation should be spread over freshly graded areas.

Trench backfill should be compacted by driving tracked or rubber-tired equipment over the trench. Because compaction should still be incomplete, a roach (or crown) should be left over the trench. It should be feathered on either side to blend the trench with adjacent areas.

Geo Measure 3: Revegetation

This measure is a required mitigation to reduced impacts to less than significant. The following measures would be implemented for the NRL antenna expansion area, cooling towers discharge system, and NETCOM MET future expansion projects. Revegetation will be undertaken on any disturbed areas to provide stabilization through erosion control and will comply with Camp Roberts policies. The area should be immediately reseeded with a native plant species seed mix that is similar in structure and composition to preconstruction conditions. The seed mix used for revegetation will be identified in coordination with Camp Roberts biologists.

Geo Measure 4: Procedures for steep slopes

This measure is a required mitigation to reduced impacts to less than significant. The following measure would be implemented for the NRL antenna expansion area project and the NETCOM MET future expansion project. Several areas of steep slopes (greater than 15 percent slope) are located in the project area. For soils on these slopes, the following measures will be implemented:

- employ erosion control techniques previously listed;
- replace topsoil, leaving the seedbed rough and fertilized appropriately; and
- use mulch or erosion control matting to protect the seed and seedbed from wind and water erosion.

3.11 TRANSPORTATION

3.11.1 Existing Conditions

Perimeter Road serves as the main access route to the SATCOM site, and unpaved roads extend through the site and into the project area and surrounding portions of Camp Roberts (U.S. Army 2005). Traffic along these routes is generally low. Most traffic occurs along Perimeter Road to access the SATCOM facility or other areas of Camp Roberts. The majority of travelers consist of SATCOM personnel and contractors, as well as personnel and contractors relating to activities at Camp Roberts.

Parking areas are scattered throughout the SATCOM site, although currently parking needs are not fully met. A dirt lot on the east side of Perimeter Road south of the main SATCOM entrance is currently used for overflow parking. Additional details on transportation at the SATCOM site are described in the 2005 and 2010 EAs.

3.11.2 Environmental Consequences

No-Action Alternative

Without implementation of the four construction projects, transportation in and adjacent to the project area would remain unchanged. Traffic levels would remain the same as current conditions with most traffic occurring along Perimeter Road to access the SATCOM facility or other areas of Camp Roberts. Parking needs at the SATCOM site would continue to not be met.

Proposed Action

The implementation of the construction projects could cause slight increases in on- and off-site traffic. Construction traffic would generally stay within Camp Roberts and not affect traffic outside of the base. Construction activities could require temporary road detours or closures and the closure of the parking lot during improvements. This could cause temporary delays along Perimeter Road for people trying to pass through the project area to the SATCOM facility or other areas of Camp Roberts. Parking would be available elsewhere at the SATCOM facility during the construction of the parking lot. If the projects

were constructed at the same time, road detours or closures could be longer and more widespread, but would still affect few people and result in minimal traffic impacts.

Additional personnel would be needed for the operation of the NRL and NETCOM MET antenna sites, which would create additional vehicle trips to and from the SATCOM facility. Furthermore, additional periodic maintenance vehicle trips would be needed to maintain the new facilities. However, additional vehicle trips would create a negligible long-term increase in traffic. The types and amount of traffic at the SATCOM facility and along Perimeter Road would be similar to current conditions. Project implementation would not affect circulation or result in delays accessing Camp Roberts or the SATCOM facility. The new access roads for the antenna sites would improve transportation circulation within the SATCOM facility and are necessary for access to the sites. The new parking lot would provide additional parking needed at the SATCOM facility and improve the safety of those who use the parking lot.

3.11.3 Avoidance, Minimization, and/or Mitigation Measures

No measures are necessary for transportation-related impacts.

3.12 VISUAL RESOURCES

3.12.1 Existing Conditions

The project area is located in the southeast portion of the Main Garrison of Camp Roberts. Rolling hills dominated by annual grassland and blue oak woodland vegetation communities surround the SATCOM site (U.S. Army 2010). The SATCOM facility comprises two operational areas located on hilltops, with logistical/industrial areas located in the valley at the base of the hills. These areas are connected by a primary road system. A mixture of building types (cinder block and masonry, brick-faced, and corrugated metal) is present at the facility. Landscape features are sparse and uncoordinated throughout the majority of the facility. The NRL and NETCOM MET antenna sites are located on hill tops comprised of annual grasslands and blue oak woodlands. The infiltration gallery site consists of a gullied ditch surrounded by hills with annual grasslands and blue oak woodlands. The proposed parking lot consists of a dirt lot. In addition to the grassland and oak woodland communities surrounding the project area, a number of roads that traverse the surrounding hills are visible from the project area.

The closest public views of the SATCOM facility are from vineyards approximately 2 miles to the northeast; existing buildings are not discernible from that distance (U.S. Army 2005). Public views of Camp Roberts exist along U.S. Highway 101 and other roads bordering the installation, as well as some nearby agricultural lands. Within Camp Roberts, the hills surrounding the SATCOM site partially obstruct views of the site. Views of the facility from the east are obstructed by a hill adjacent to the site. Views from the SATCOM facility include rolling hills dominated by annual grassland and blue oak

woodland vegetation communities. Views of the project area are generally the same as those surrounding the SATCOM facility. Views of the project area from Perimeter Road include a hill with oak woodlands where the NRL antenna site is proposed, a dirt road and surrounding oak woodlands where the security fence is proposed, and the existing dirt parking lot. The NETCOM MET antenna site and infiltration gallery site are not visible from Perimeter Road. Additional details on the visual resources at the SATCOM site are described in the 2005 and 2010 EAs.

3.12.2 Environmental Consequences

No-Action Alternative

Without implementation of the four construction projects, visual resources in and adjacent to the project area would remain unchanged. The project area would have the same aesthetic quality that currently exists.

Proposed Action

Construction activities associated with the four projects and the new facilities installed as part of the NRL antenna site, new security fence line, NETCOM MET antenna site, and parking lot would be visible, to varying degrees, from the SATCOM facility. The construction activities would be temporary in nature and would not disrupt any views of or from the project area. The new facilities would be visually similar to existing facilities at the SATCOM site and would not be noticeable from distant viewing locations, such as the vineyards 2 miles away or U.S. Highway 101. None of the projects would alter public views of the SATCOM site because of the visual consistency between the new and existing facilities. If the projects were constructed at the same time, temporary visual changes would occur across the project area simultaneously, degrading overall visual character of the project area more so than if the project were carried out separately. The visual impacts associated with each project are described below.

Project 1: SATCOM Expansion to South for NRL Antenna

The construction of the NRL antenna facility, associated access routes, and establishment of additional fence line would require vegetation removal and disturb up to 4.6 acres of soil, degrading the visual character of the site until the new facility is installed. The new facility would change the visual setting of the hilltop of annual grassland and blue oak woodland. However, it would be visually consistent with the existing SATCOM facility. The security fence would have a large clear zone, which would be devoid of vegetation and would somewhat degrade the visual quality of the area despite its location along existing roads. The security fence and antenna site would be visible from Perimeter Road. The new antenna is unlikely to be noticed from the vineyards that are 2 miles east of the SATCOM site due to the distance and hills between the project area and the vineyards. Depending on elevation, vegetation cover, and proximity, the new antenna could be visible from the west and south, but it would appear visually similar to the existing SATCOM facility.

Project 2: NETCOM Parking Lot along Perimeter Road

The new parking lot would be visible from the SATCOM facility and Perimeter Road. The parking lot would have similar aesthetic qualities as the existing site, although it would be covered by a compacted aggregate base course parking surface, asphalt/chip seal, or a similar surface and be surrounded by a fence for security purposes. The parking lot would be visually similar to existing roads and parking areas at the SATCOM facility.

Project 3: Discharge System for Cooling Towers

The construction of the infiltration gallery and pipe replacement would remove low-growing or herbaceous vegetation and disturb about 0.5 acre of soil, temporarily disturbing the aesthetic quality of the site. However, because project construction would not be visible from the SATCOM facility or Perimeter Road, it would not temporarily degrade any views. Once the infiltration gallery is constructed, it would be below ground and would not be evident to people traveling along the adjacent dirt road..

Project 4: NETCOM MET Site Future Expansion Area

The location of this project is in the westward expansion of the SATCOM site, which was previously evaluated in the 2005 ADP EA (U.S. Army 2005). In addition, the MET site expansion area is within an area proposed for fencing, and the effects of fencing the area around the MET site were evaluated in the 2013 EA (U.S. Army 2013). Visual resources impacts and measures discussed in those EAs were incorporated into this analysis, to the extent applicable.

The construction of the project would remove vegetation and expose up to 3.8 acres of soil, degrading the visual character of the site until the new facility is installed. The new facility would change the visual setting of the hilltop of annual grassland and blue oak woodland. However, it would be visually consistent with the existing SATCOM facility. Within Camp Roberts, the hills surrounding SATCOM would partially obstruct views of the antenna. Views of the facility from the east are obstructed by a hill adjacent to the site. The antenna site would be visible from Perimeter Road, but is unlikely to be noticed from the vineyards that are 2 miles east of the SATCOM site due to the distance and hills between the project area and the vineyards. Depending on elevation, vegetation cover, and proximity, the new antennas could be visible from the west and south, but they would appear visually similar to the existing SATCOM facility.

3.12.3 Avoidance, Minimizaiton, and/or Mitigation Measures

No measures are necessary for visual resources related impacts.

3.13 WATER RESOURCES

3.13.1 Existing Conditions

General hydrology conditions of the SATCOM site are described in the 2005 EA. The natural topography of the project area creates a series of hills with intervening low-lying areas that convey seasonal runoff. Based on a reconnaissance-level field visit conducted in November 2013, surface water was present only in the location of the existing cooling tower discharge site, and the low-lying areas likely only convey small volumes of runoff during major precipitation events, otherwise water likely percolates into the ground. The project area is in the Salinas River watershed in the southern portion of the Salinas River Valley (U.S. Army 2013). Runoff from the project area drains into nearby unnamed intermittent streams that flow south to San Marcos Creek or north to Nacimiento River, which are both tributary to the Salinas River. Due to extreme drought conditions, San Luis Obispo County declared a local emergency in March 2014 (Resolution No. 2014-64, dated March 11, 2014) and advised the public to conserve water due to the current threats to public and private drinking water supplies as a result of decreasing supplies of ground water and other sources. Ongoing drought conditions can affect availability of water at the SATCOM site and fire protection efforts across Camp Roberts.

The Paso Robles groundwater basin underlies the southern portion of Camp Roberts, where the SATCOM facility is located (U.S. Army 2010). The Paso Robles groundwater basin is characterized by thick continental gravel, sand, and clay, which yield high volumes of water. The aquifer is recharged mostly through percolation from streams; precipitation, irrigation water, and treated wastewater contribute to recharge as well. Well water used for domestic purposes at Camp Roberts is treated with chlorine as a precaution; no other treatment has been necessary.

Discharged wastewater from cooling towers associated with Building 18000 at the SATCOM facility has created a small ephemeral gully in the southwestern portion of the project area that generally follows an existing road (U.S. Army 2013). This artificial gully lacks vegetation and appears to end a short distance from the discharge point, where a road forms a barrier to further flow (U.S. Army 2013). The gully also likely conveys runoff and might overtop the road during major precipitation events; however, because of its primarily artificial flow and lack of direct connection to a natural drainage, it would not be considered a water of the United States. No waters of the United States, including wetlands, or waters of the State are present in the project area based on the field reconnaissance in November 2013 (North State Resources, Inc. 2014a).

3.13.2 Environmental Consequences

No-Action Alternative

Without implementation of the four construction projects, no ground-disturbing activities would take place in the project area. No modifications to topography or runoff patterns would occur, and no

construction-related water quality impacts would take place. The existing discharge system for cooling towers would continue to create a standing pool of water with associated effects on nuisance species, erosion, and soil and vegetation disturbance.

Proposed Action

Construction activities such as vegetation removal and leveling of topography would disturb and expose soil, which could discharge sediment into runoff during precipitation or storm events, which could be carried into downslope drainages and affect water quality. Likewise, pollutants from construction equipment could be carried off-site in runoff if spills are not properly contained. If the projects were constructed at the same time, the collective water quality impacts from sediment and pollutants associated with all four projects would be greater than if the projects were carried out separately. If construction activities are scheduled outside of the wet season, potential adverse effects on water quality in drainages would be substantially reduced. The water resources impacts associated with each project are described below.

Most of the projects would increase the amount of impermeable surface area at the SATCOM site and modify topography of the project area to some extent, as discussed below for each project.

Project 1: SATCOM Expansion to South for NRL Antenna

The construction of the NRL antenna facility, associated access roads, and security fence would require vegetation removal and soil disturbance on up to 4.6 acres, including leveling of the hilltop and security fence clear zone. Because of the extent of steep slopes in the project area, these activities would result in a large amount of soil disturbance, which could result in eroded sediment entering nearby drainages. In addition, pollutants from construction equipment could be carried off-site in runoff if spills are not properly contained. During construction, contaminants that are spilled could, if left uncontained, percolate through the soil and enter the groundwater system. Implementation of Water Measure 1, as well as Geo Measures 1 through 4 and Haz Measure 1, would avoid or minimize potential construction-related impacts from the project on surface and groundwater quality.

As a result of the need to level slopes in the project area to accommodate the new antenna site, access roads, and clear zone for the fence, topography and drainage patterns would be modified. Up to 1.5 acres of impermeable surface would be added from the establishment of the NRL antenna site and paved road, resulting in a possible slight increase in runoff. Runoff from these areas would be conveyed into adjacent areas where it would percolate into the ground or be conveyed through low-lying areas and drainages. Any new stormwater culverts installed under the roads in the project area would help convey flow under the roads to prevent erosion along the roads.

Project 2: NETCOM Parking Lot along Perimeter Road

The construction of the proposed parking lot would disturb less than 1 acre of soil, resulting in minimal potential impacts on water quality. Minimal vegetation removal would be needed. In addition,

pollutants from construction equipment could be carried off-site or into the adjacent ditch in runoff if spills are not properly contained. During construction, contaminants that are spilled could, if left uncontained, percolate through the soil and enter the groundwater system. Soils in the project area are currently exposed, making them vulnerable to erosion during precipitation events. The establishment of a compacted aggregate base course surface, asphalt/chip seal, or a similar parking surface would reduce the potential for pollutants or sediment being discharged in runoff over the long term.

Establishment of the new parking lot would add less than 1 acre of semi-impermeable surface to the project area. Drainage patterns would remain similar to what currently exists at the lot. Runoff from the project area would be conveyed into adjacent areas, such as the roadside ditch, where it would percolate into the ground or be conveyed through low-lying areas and drainages.

Project 3: Discharge System for Cooling Towers

The construction of the infiltration gallery would disturb about 0.5 acre of soil and would require minimal vegetation removal, resulting in minimal potential impacts on water quality. Construction activities would take place when the cooling towers are turned off, so water is not expected to be present in the current discharge area when the infiltration gallery is installed and pipe segment is replaced. If construction takes places during the wet season, water may be present in the gully, and water quality impacts could result from soil disturbance and possible pollutants entering the water. Implementation of Geo Measures 1 through 4 and Haz Measure 1 would reduce potential water quality impacts during construction.

Drainage patterns at the current discharge area would be altered because wastewater would be detained in the infiltration gallery and allowed to percolate into the groundwater. This would stop the gully erosion caused by the discharge of wastewater from the current system and would be an improvement over existing conditions.

Project 4: NETCOM MET Site Future Expansion Area

The construction of the NETCOM MET antenna facility would require vegetation removal and soil disturbance on up to 3.8 acres, including leveling of the hilltop. The location of this project is in the westward expansion of the SATCOM site, which was previously evaluated in the 2005 ADP EA (U.S. Army 2005). Water resources impacts and measures discussed in the EA were incorporated into this analysis, to the extent applicable.

Vegetation removal would expose soils to increased erosion potential, particularly during precipitation events. Because of the extent of steep slopes in the project area, these activities would result in a large amount of soil disturbance, which could result in eroded sediment entering nearby drainages. In addition, pollutants from construction equipment could be carried off-site in runoff if spills are not properly contained. During construction, contaminants that are spilled could, if left uncontained, entering nearby water bodies or percolate through the soil and enter the groundwater system.

Implementation of Water Measure 1, as well as Geo Measures 1 through 4, would avoid or minimize potential construction-related impacts from the project on surface or groundwater quality.

Establishment of the NETCOM MET antenna site would add a small amount of impermeable surface to the project area associated with the concrete pads, paved roadway, and parking areas. This increased surface area would result in a slight increase in runoff from the antenna site.

3.13.3 Avoidance, Minimization and/or Mitigation Measures

Implementation of Water Measure 1, as well as Geo Measures 1 through 4 and Haz Measure 1, would minimize adverse water quality-related effects during construction activities. Water Measure 1, Geo Measures 1 and 2 and Haz Measure 1 shall be implemented per agency consultation, permit conditions, Installation management plans, and/or BMPs. Geo Measures 3 and 4 are required mitigations.

Water Measure 1: Implement a stormwater pollution prevention plan for activities that disturb 1 acre or more of land

Because construction activities for the NRL antenna site and security fence and MET antenna site expansion would affect more than 1 acre, the U.S. Army or construction contractor(s) will be required to obtain coverage under the *General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2010-0014-DWQ)* by filing permit registration documents, including a Notice of Intent, stormwater pollution prevention plan (SWPPP), and other compliance related documents. The SWPPP is designed to manage stormwater associated with construction activities and must describe best management practices (BMPs) to minimize the potential for exposed soils or other contaminants from construction activities in the project area to reach surface waters. Such BMPs could include application of water sprays to keep soil from becoming airborne, the use of silt fences, covering of soil stockpiles, use of soil sealants, re-vegetation of disturbed areas, or other BMPs as described in Geo Measures 1 through 4 in Section 3.10.3. In addition, post-construction stormwater management measures will need to be incorporated into the project design and a long-term maintenance plan will be established to comply with post-construction requirements of the General Permit.

CHAPTER 4 CUMULATIVE IMPACTS AND IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

4.1 CUMULATIVE IMPACTS

This EA also considers the effects of cumulative impacts (40 CFR 1508.7) and concurrent actions (40 CFR 1508.25(1)) that may be implemented at the same time or in the same vicinity as the proposed action. A cumulative impact, as defined by the CEQ (40 CFR 1508.7), is the “impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of which agency (federal or non-federal) or person undertakes such actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.”

4.1.1 Related Projects

The U.S. Army has identified a number of projects at and near the SATCOM site that may be implemented at the same time as the proposed action or result in similar impacts that could result in cumulative impacts. The environmental impacts of the other actions have been or will be analyzed in separate NEPA documents. This EA addresses the environmental impacts of these other actions only in the context of potential cumulative impacts. Other actions considered in this cumulative impacts analysis include:

1. Continued implementation of the SATCOM ADP includes several short-range and long-range projects within the existing SATCOM fence and several long-range projects within the western expansion area (U.S. Army 2005).
2. The perimeter fence will be expanded to the west to encompass an expansion area for future development (U.S. Army 2013).
3. The Satellite Earth Terminal Station Facility at Teleport Hill will receive two new advanced extremely high frequency (AEHF) SATCOM terminals consisting of a 10-foot AEHF antenna group, 15-foot AEHF antenna radome, AEHF communications group, baseband interface equipment, and cabinets.
4. The NRL is planning implementation of phase 1 of its communications system project at the SATCOM site.
5. Various other minor projects will be implemented at the SATCOM site, such as a water well installation, cattle fence installation along some roads, temporary terminals, trenching for fiber lines, and security improvements at the main entrance.

6. Camp Roberts secured additional land around the McMillan Airfield south of the SATCOM site to secure its unmanned aerial systems mission and establish conservation easements to prevent development near the airfield (Matrix Design Group 2013). Improvements may also be made to the airfield to adjust the location of the clear zone, where certain activities are restricted.

4.1.2 Impact Discussion

The analysis of cumulative impacts focuses on the resource topics evaluated in detail in this EA. For other resource topics dismissed in Table 3-1, the proposed action would result in insignificant to no impacts; therefore, the incremental impacts of the proposed action in combination with other projects listed above would not elevate to a cumulative level of significance for those topics.

Air Quality

Air quality impacts associated with the proposed action would be localized around the project area and would be temporary, limited to the construction period and periodic maintenance activities, or short-term, limited to periodic operational emissions from truck access along dirt roads and maintenance activities. Construction-related emissions would contribute minimally to air quality in the region and would not result in violations of federal air quality standards. Other projects implemented at or near the SATCOM site during the same construction period as one or more of the projects associated with the proposed action would also contribute to emissions in the local area, but cumulative impacts would not be expected to adversely affect regional air quality. The other projects listed above would result in similar types of emissions and air quality impacts as the proposed action, which would be minor and primarily temporary. Emissions would be expected to dissipate within the vicinity of the work area, and emission control and reduction measures would be implemented during all projects. Cumulative impacts on local and regional air quality from the proposed action and related projects listed above would be minor, and the greenhouse gas emissions generated as a result of the projects would cause an incremental, but not cumulatively significant, increase in global greenhouse gas concentrations.

Biological Resources

The proposed action would result in a loss of up to about 9 acres of woodlands and grasslands at Camp Roberts and temporary disturbance to wildlife species, such as the federally listed San Joaquin kit fox, that may use the habitats in and adjacent to the project area. No impacts on special-status plants are anticipated with the avoidance and minimization measures described for the proposed action. Other projects listed above could also result in the loss of grassland and oak woodland habitat, but they would be designed to minimize the loss of habitats and removed oak trees would be replaced in accordance with the Camp Roberts INRMP. Preactivity surveys and avoidance and minimization measures would be implemented with each project to reduce the potential for adverse impacts on special-status plants and wildlife. The cumulative loss of habitat at the SATCOM site would be minimal compared with the expansive amount of habitat available at the surrounding areas of Camp Roberts. Cumulative impacts

on San Joaquin kit fox and its habitat would be minimized through the use of applicable measures provided in the USFWS informal consultation concurrence letter dated August 17, 2015, the *Programmatic Biological Opinion for Multiple Activities at Camp Roberts, San Luis Obispo and Monterey Counties, California (1-8-08-F-24)* and *Standard Recommendations for Protection of the San Joaquin Kit Fox Prior to or During Ground Disturbance* (USFWS 2011) and/or measures identified in the project-specific consultation documents. Cumulative impacts on biological resources from the proposed action and related projects listed above would be minor.

Cultural Resources

The proposed action is not expected to affect historic properties or other cultural resources and would not contribute to cumulative impacts at Camp Roberts. Other projects listed above would comply with the POM and Camp Roberts ICRMPs, as applicable, and Section 106 consultation requirements and would have minimal to no effects on cultural resources with implementation of measures that result from the consultation process. No cumulative impacts are anticipated.

Hazards and Hazardous Materials

The proposed action could release hazardous materials into the environment through leaks and/or spills, resulting in the contamination of soils and/or water and possible human exposure to hazardous materials. The proposed action could also pose a hazard to humans through accidental ignition of fire, unexploded ordinance, or electrical shock. Impacts related to hazards and hazardous materials would be temporary and limited to the construction period and periodic maintenance activities. None of the other projects listed above would result in hazards or hazardous materials impacts in the project area, but nearby areas of the SATCOM site would also be subject to hazards and hazardous materials impacts from the other projects. Overall hazard and hazardous materials impacts at the SATCOM site would result in cumulative impacts; however, measures would be implemented with each project to minimize hazard- and hazardous materials-related impacts. Cumulative impacts on hazard and hazardous materials would be minor.

Infrastructure

The proposed action would expand some utility lines and access roads for the new facilities to improve operations at the SATCOM site. The effects would be primarily beneficial for operations, although construction activities could result in temporary utility and access disruptions. Other projects at the SATCOM site would also result in the improvement or expansion of infrastructure and other facilities at the SATCOM site. Cumulative impacts would be beneficial overall and would allow the U.S. Army to fulfill its mission at the SATCOM site and maintain communications facilities in accordance with the latest technology.

Land Use

The proposed action would modify the land uses of the project area from mostly open space to new facilities to support SATCOM operations. The new uses would be consistent with existing uses at the

SATCOM site and would not be expected to create conflicts with other surrounding uses. Temporary use disruptions and disturbance would occur during construction activities, and measures identified for other resources would alleviate these short-term impacts. Other projects at the SATCOM site would also have similar uses as the existing operations and would not be expected to substantially modify the land uses of the area. Overall land use changes would be consistent with the missions of the SATCOM facility and Camp Roberts. Cumulative land use impacts would be minor.

Noise

The proposed action would result in an increase in localized noise around the SATCOM site, but few sensitive receptors would be exposed to the increased noise levels. Other projects implemented at the SATCOM site would also contribute to increases in noise from construction activities and any increases in operational activities that generate noise. Because of the existing ongoing sources of noise associated with operations at the SATCOM site and few sensitive receptors, cumulative noise impacts would be minimal.

Soil Resources

Soil impacts associated with the proposed action would be limited to soil disturbance and a potential for increased erosion. These impacts would be localized in the project area and would be temporary, limited to the construction period and periodic maintenance activities. None of the other projects listed above would result in soil impacts in the project area, but nearby areas of the SATCOM site would also be subject to soil disturbance from the other projects. Overall soil disturbance at the SATCOM site would result in cumulative soil impacts; however, erosion control measures would be implemented with each project to minimize erosion-related impacts. Cumulative impacts on soil would be minor.

Transportation

The proposed action would result in a temporary increase in traffic to and from the SATCOM site from construction vehicles and a minor long-term increase in traffic from increased operations. The parking lot improvements would enhance parking capabilities for SATCOM operations. The expanded security fence would restrict access to the expanded area where the new NRL antenna would be installed, but this is a necessary security measure. Overall access to and from the SATCOM site would be similar to current conditions. Other projects implemented at or near the SATCOM site would also result in slight increases in construction and operational traffic, but these increases would not be considered substantial. Cumulative traffic impacts would be minor.

Visual Resources

The proposed action would modify the visual character of the project area, but the new facilities would be visually similar to existing facilities at the SATCOM site. Other projects implemented at the SATCOM site could also modify the visual character of their project areas, but all facilities would be expected to be visually similar to existing facilities. Overall views of the SATCOM site would not be substantially altered. Cumulative visual impacts would be minor.

Water Resources

Hydrology and water quality impacts associated with the proposed action would be localized in and around the project area. Construction-related water quality impacts would be temporary and minimal, and slope modifications would alter drainage patterns across the project area, although changes in runoff would be minimal. None of the other projects listed above would result in hydrology or water quality impacts in the project area, but they could affect the same watershed and some of the same downslope drainages as the proposed action. Ground disturbance and construction activities associated with the other projects would result in similar water quality impacts as the proposed action; however, erosion control measures and BMPs would be implemented with each project to minimize water quality-related impacts. Cumulative impacts on water resources would be minor.

4.2 IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

NEPA CEQ regulations require environmental analyses to identify “...any irreversible and irretrievable commitments of resources that would be involved in the proposal should it be implemented” (40 CFR Section 1502.16). Irreversible and irretrievable resource commitments are related to the use of nonrenewable resources and the resulting effects on future generations. Irreversible effects primarily result from the use or destruction of a specific resource (e.g., energy, minerals) that cannot be replaced within a reasonable timeframe. Irretrievable resource commitments involve the loss in value of an affected resource that cannot be restored as a result of the action (e.g., extinction of a threatened or endangered species or the disturbance of a cultural site).

The proposed action would not have irreversible impacts on the land because the affected area could be used for other activities in the future. However, the loss of blue oak woodlands in the project area would be irreversible for more than 50 years due to the time it would take to restore mature trees to the area if it is no longer used for the proposed purposes. The primary irretrievable impact of the proposed action is from the use of energy, labor, materials, and funds. Irretrievable impacts would result from the use of fuel and other nonrenewable resources for construction. No irreversible or irretrievable commitment of natural or cultural resources is expected to result from the four construction projects. Implementation of standard operating procedures from the POM and Camp Roberts ICRMPs, guidance from the POM and Camp Roberts INRMPs, and the measures identified in this EA for natural and cultural resources would reduce the potential for the irreversible or irretrievable loss of natural or cultural resources as a result of the proposed action.

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CHAPTER 5 FINDINGS AND CONCLUSIONS

5.1 FINDINGS

After an examination of all resource areas, it has been determined that the proposed action would have no or insignificant effects on agricultural resources, environmental justice, geology, population and housing, public services, recreation, and socioeconomics. Upon further analysis, it was determined that the proposed action would have less than significant effects on cultural resources, hazards and hazardous materials, infrastructure, land use, noise, transportation, and visual resources. Additionally, it was determined that the proposed action would have less than significant effects on air quality, biological resources, soils, and water resources with implementation of the measures incorporated into the proposed action and the mitigation measures identified in this EA.

5.2 CONCLUSIONS

Based on the environmental analyses contained in this EA, it has been determined that implementation of the proposed action would not have any significant direct, indirect, or cumulative impacts on the human environment. Because no significant impacts would result from implementing the proposed action, an environmental impact statement is not required and will not be prepared. These EA findings and conclusions are the basis for the Finding of No Significant Impact.

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Ethan Bertrando, Archaeologist, Camp Roberts

Eric Treworgy, Contractor Support, Naval Research Lab

Joe Bishop, Contractor Support, Naval Research Lab

Bruce Villere, Electrical Engineer, Facilities and Construction, U.S. Army NETCOM

Shellie Sullo, Social Science Study Manager, Planning Division Sacramento District, US Army Corps of Engineers

7.2 NORTH STATE RESOURCES

Leslie Perry, Project Manager/Environmental Analyst

Wirt Lanning, NEPA Program Manager

Andrew Minks, Environmental Analyst

Patrick Martin, Biologist

Brian Ludwig, Cultural Resources Principal Investigator

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APPENDIX A

Interagency and Public Coordination

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Draft EA Distribution



DEPARTMENT OF THE ARMY
US ARMY INSTALLATION MANAGEMENT COMMAND
HEADQUARTERS, US ARMY GARRISON, PRESIDIO OF MONTEREY
1759 LEWIS ROAD, SUITE 210
MONTEREY, CA 93944-3223

MAR 17 2015

Office of the Garrison Commander

Dear Interested Parties:

The Department of the Army invites all interested parties to review and comment on the Draft Environmental Assessment (EA) for implementation of four construction projects at the Camp Roberts Satellite Communications (SATCOM) site.

The proposed actions consist of: 1) the SATCOM expansion to the south for construction of a Naval Research Lab (NRL) antenna pad and security fence, 2) a parking lot along Perimeter Road for the Network Enterprise Technology Command/9th Army Signal Command (NETCOM), 3) a discharge system for the cooling towers associated with Building 18000, and 4) a Modernization of Enterprise Terminals (MET) site future expansion for NETCOM. The proposed action is needed to facilitate long-term growth and expansion of the SATCOM facility to respond to new technologies and accommodate additional communications needs associated with an enhanced mission definition and modernized equipment systems.

The Draft EA was prepared pursuant to the National Environmental Policy Act (NEPA) of 1969 (Public Law 91-190, 42 U.S. Code §4321 et seq.), the Council on Environmental Quality regulations for implementing NEPA (40 Code of Federal Regulations (CFR), Parts 1500–1508), and Environmental Analysis of Army Actions (32 CFR 651 March 2002). The EA evaluates potential environmental impacts of the proposed action and identifies measures to minimize or avoid adverse environmental effects.

Comments on the Draft EA are due no later than 5:00 p.m. on April 29, 2015.

The Draft EA is available for review at the following locations:

Paso Robles Public Library
1000 Spring Street
Paso Robles, CA 93446
Phone: (805) 237-3870

San Miguel Public Library
254 13th Street
San Miguel, CA 93451
Phone: (805) 467-3224

Presidio of Monterey website at:
http://www.monterey.army.mil/dpw/env_assessment.html

U.S. Army Garrison, Presidio of Monterey
Department of Public Works
Bldg 4463 Gigling Road 3rd Floor
Monterey, CA 93944
Phone: (831) 242-7925

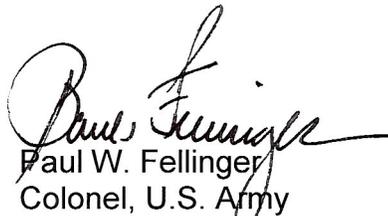
Please forward written comments to:

Attn: Lenore R. Grover-Bullington
Directorate of Public Works, Environmental Division
P.O. Box 5004
Monterey, California 93944-5004

Via electronic mail to: Lenore.r.grover-bullington.civ@mail.mil

Via facsimile to: 831-242-7019

Sincerely,


Paul W. Fellingner
Colonel, U.S. Army
Garrison Commander

THE *Newspaper of the Central Coast*
TRIBUNE

3825 South Higuera • Post Office Box 112 • San Luis Obispo, California 93406-0112 • (805) 781-7800

In The Superior Court of The State of California
In and for the County of San Luis Obispo
AFFIDAVIT OF PUBLICATION

AD # 1634995
NORTH STATE RESOURCES

STATE OF CALIFORNIA
ss.
County of San Luis Obispo

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen and not interested in the above entitled matter; I am now, and at all times embraced in the publication herein mentioned was, the principal clerk of the printers and publishers of THE TRIBUNE, a newspaper of general Circulation, printed and published daily at the City of San Luis Obispo in the above named county and state; that notice at which the annexed clippings is a true copy, was published in the above-named newspaper and not in any supplement thereof – on the following dates to wit; MARCH 28, 29, 2015 that said newspaper was duly and regularly ascertained and established a newspaper of general circulation by Decree entered in the Superior Court of San Luis Obispo County, State of California, on June 9, 1952, Case #19139 under the Government Code of the State of California.

I certify (or declare) under the penalty of perjury that the foregoing is true and correct.



(Signature of Principal Clerk)
DATED: MARCH 29, 2015
AD COST: \$329.96

**Presidio of Monterey
Draft Environmental Assessment for
Multiple Construction Projects**

The U.S. Army Invites Public Comments on the Draft Environmental Assessment (EA) for Multiple Construction Projects at the Satellite Communications Station (SATCOM), Camp Roberts, San Luis Obispo County, California.

The United States Army has prepared an EA to evaluate the environmental effects of constructing four projects at the SATCOM site: a Naval Research Lab antenna expansion site and security fence, a parking lot, a discharge system for two cooling towers, and a Modernization of Enterprise Terminals (MET) site future expansion for Network Enterprise Technology Command (NETCOM). These projects would be constructed on about 9.5 acres to the south and west of the existing SATCOM facility.

A copy of the draft EA and draft Finding of No Significant Impact will be available for review beginning March 30, 2015 at the following locations:

Paso Robles Public Library
1000 Spring Street
Paso Robles, CA 93446

San Miguel Public Library
254 13th Street
San Miguel, CA 93451

U.S. Army Garrison
Presidio of Monterey Department
of Public Works
4463 Gigling Road
Monterey, CA 93944

Presidio of Monterey website:
http://www.monterey.army.mil/dpw/env_assessment.html

You may also request a copy of the document from the address below.

Please forward written comments to:
Lenore Grover-Bullington
U.S. Army Garrison, Presidio of
Monterey
Directorate of Public Works,
Environmental Div.
P.O. Box 5004
Monterey, CA 93944
Email to: Lenore.r.grover-bullington.civ@mail.mil

**THE DEADLINE FOR PROVIDING
PUBLIC COMMENTS IS April 29, 2015**
March 28, 29, 2015 1634995

Draft EA Distribution List

Fisheries, Wildlife, and
Environmental Programs
California Department of Fish and
Wildlife
Central Region
1234 E. Shaw Avenue
Fresno, CA 93710

California State Water Resources
Control Board
Division of Water Quality
P.O. Box 100
Sacramento, CA 95812-0100

Librarian
Paso Robles Public Library
1000 Spring Street
Paso Robles, CA 93446

Andy Mutziger
San Luis Obispo County
Air Pollution Control District
3433 Roberto Court
San Luis Obispo, CA 93401

Sierra Club
Santa Lucia Chapter
P.O. Box 15755
San Luis Obispo, CA 93406

Alec Arago
Honorable Sam Farr, 17th
Congressional District
100 West Alisal Street
Salinas, CA 93901

Donald Martin
NETCOM
Chief of Logistics, 514th Signal
Company
Bldg 18000 E. Perimeter Road
Camp Roberts, CA 93451-5000

Scott Barnes
Interested Member of the Public
barnesscott@hotmail.com

California Energy Commission
1516 Ninth Street, MS29
Sacramento, CA 95814

John Goni
Central Coast Regional Water
Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401

Librarian
San Miguel Ligrary
254 13th Street P.O. Box 86
San Miguel, CA 93451

San Luis Obispo County
Department of Planning &
Building
Courthouse Annex Room 300
San Luis Obispo, CA 93408

Federal Agencies Programs
Coordinator
U.S. Environmental Protection
Agency
Region IX
75 Hawthorne Street
San Francisco, CA 94105

Rich Morris, Environmental
Program Manager
Department of the Army, HQ
IMCOM, G-4
Public Works Division,
Environmental Branch, IMPW-V
2450 Stanley Road, Suite 101
Fort Sam Houston, TX 78234-
6102

Bruce Villere
NETCOM
G4, Command Engineer Division
2133 Cushing Street, Suite 2313
Ft. Huachuca, AZ 85613-5000

Eric Treworgy, Contractor
Support
Naval Research Lab
eric.treworgy.ctr@c8140.nrl.navy.
mil

California Native Plant Society
San Luis Obispo Chapter
P.O. Box 784
San Luis Obispo, CA 93406

Lenore Grover-Bullington
Department of the Army
Presidio of Monterey
P.O. Box 5004
Monterey, CA 93940

Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Freddie Romero
Santa Ynez Band of Chumash
Indians
Cultural Preservation Consultant
P.O. Box 517
Santa Ynez, CA 93460

Diane K. Noda
U.S. Fish and Wildlife Service
Ventura Fish and Wildlife Office
2493 Portola Road, Suite B
Ventura, CA 93003

Shellie Sullo
U.S. Army Corps of Engineers,
Sacramento District
CECT-SPK
1325 J Street
Sacramento, CA 95814-2922

Mark Williams
California Army National Guard
Environmental Lead
Headquarters Camp Roberts
Bldg. 910
Camp Roberts, CA 93451-5000

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Agency/Tribal Consultation Letters



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ventura Fish and Wildlife Office
2493 Portola Road, Suite B
Ventura, California 93003



IN REPLY REFER TO:
08EVEN00-2015-I-0279

August 17, 2015

James M. Willison, Director
Directorate of Public Works
United States Army Garrison, Presidio of Monterey
Building 4463 Gigling Road
Monterey, California 93944-5004

Subject: Informal Consultation for Construction Projects at the Satellite Communications Site, Camp Roberts, San Luis Obispo County, California

Dear Mr. Willison:

We have reviewed your letter, received in our office on March 30, 2015, requesting our concurrence with your determination that the proposed construction projects at the Satellite Communications Station (SATCOM) site on Camp Roberts, San Luis Obispo County, California, may affect but are not likely to adversely affect the federally endangered San Joaquin kit fox (*Vulpes macrotis mutica*), and the federally threatened vernal pool fairy shrimp (*Branchinecta lynchi*) and purple amole (*Chlorogalum purpureum* var. *purpureum*). Our review of the projects and their potential impacts is based primarily on your request for informal consultation, the draft environmental assessment for the proposed projects (U.S Department of the Army (Army) 2015), the Biological Resources Characterization report (Army 2014), and communications between Army and U.S. Fish and Wildlife Service (Service) staff.

Project Location and Description

The Army proposes to implement four construction projects at the SATCOM site at Camp Roberts in support of the Naval Research Lab (NRL) and U.S. Army Network Enterprise Technology Command/9th Army Signal Command (NETCOM) operations. The Army owns Camp Roberts, which is licensed to and managed by the California Army National Guard. Within the boundary of Camp Roberts is SATCOM, an 81-acre property managed by the U.S. Army Garrison Presidio of Monterey, where the Army maintains operational control. The proposed action is needed to facilitate long-term growth and expansion of the SATCOM facility, responding to new technologies and accommodating additional communications needs associated with an enhanced mission definition and modernized equipment systems. The four construction projects include two antenna sites, associated infrastructure, a parking lot, and a wastewater discharge system. The four proposed projects are described below and locations are depicted in Appendix A.

1. Construction activities associated with NRL antenna and associated access roads would involve ground disturbance and vegetation removal on about 1.5 acres of blue oak (*Quercus douglasii*) woodlands and grasslands on a hill south of the existing SATCOM facility. The SATCOM expansion for construction of an NRL antenna pad and security fence would include a 72-foot-tall antenna, an antenna pad, newly graded and paved access roads, security fence, and utility lines on about 4.6 acres just south of the existing SATCOM site. The antenna site would consist of an antenna pedestal, radome ring wall (88 feet in diameter), apron (150 feet in diameter), and equipment pads on the apron. The new access road would be 18 feet wide and paved from the southern perimeter road to the antenna apron. Parking would be available along the road, and a corridor about 35 feet wide would be established, including the 18 feet of paved road and adjacent graded areas for parking. If deemed necessary by the NRL, a second access road of similar width would be installed via grading and paving.
2. A parking lot along Perimeter Road for NETCOM would include approximately 40 parking spaces south of the existing SATCOM access gate. Site preparation and resurfacing of the parking lot would require minimal vegetation removal of herbaceous and weedy species. Establishment of the parking lot would require grading of an area approximately 500 feet long by 70 feet wide (35,000 square feet or 0.80 acre). The surface of the parking lot would be composed of compacted aggregate base course parking surface, asphalt/chip seal, or a similar surface that can withstand daily use and support striping. The parking lot would be surrounded by a 36- to 42-inch-tall chain link fence between the parking lot and an adjacent ditch for personnel safety. Surface runoff would be conveyed into the ditch as it drains off the parking lot.
3. Wastewater from two cooling towers that provide cooling for Building 18000, currently discharges to land southwest of the SATCOM site via a mostly subterranean pipeline outside the existing SATCOM fence, resulting in a standing pool of water. An infiltration gallery or similar system would be constructed where the wastewater is currently discharged. Installation of the infiltration gallery and pipeline replacement would involve ground disturbance in a previously disturbed area. The infiltrators would be installed on either native soil or a thin layer of gravel drain rock and would be manifolded together and backfilled with drain rock. The infiltrators would be covered with about 12 to 18 inches of native soil. The infiltration area would be about 100 feet by 20 feet (less than 0.1 acre) or smaller; however, staging, access, and related construction activities would occur on surrounding land in an area encompassing about 0.5 acre total.
4. The Modernization of Enterprise Terminals (MET) site expansion area along the ridgeline west of the SATCOM facility would be constructed to allow future placement of at least two satellite antennas and a restoral pad or three antennas. The antennas may be built in phases, as they are needed. The antennas would house equipment in their base pedestals or in separate relocatable shelters, depending on the type of system installed. Antenna requirements have not been defined but are anticipated to be no more extensive

in size and installation/operation scope than the current MET antenna, which is approximately 50 feet tall above foundation at its maximum arc and has a maximum pivot radius of about 28 feet. A radome is normally not required at this location for Army systems, but if required, it would be a globe about 70 feet in diameter. The MET site expansion area would result in vegetation removal and ground disturbance on approximately 3.8 acres, although disturbance within that area would be limited to the maximum necessary to level the ridgeline and install the antennas and associated facilities.

Listed Species in the Project Area

The following information and citations have been gathered from the Biological Characterization Report (North State Resources, Inc. 2014).

San Joaquin Kit Fox

Much of the land surrounding the SATCOM facility has been subject to surveys for San Joaquin kit fox and its habitat (U.S. Army 2005, 2013; Vanherwig 2011). Approximately 33 occurrences of San Joaquin kit fox have been reported on Camp Roberts with several occurrences within 2 miles of the study area (U.S. Army 2005, 2013). The population of kit foxes at Camp Roberts has been declining since 1988 (U.S. Army 2005, 2013). No kit fox sign was detected in 2013 during planning-level surveys in the western expansion area, which encompasses the MET site (Tetra Tech, Inc. and ICF International 2014). During the field visit, small mammal prey appeared to be abundant, and friable soils were present. Suitable burrows for San Joaquin kit fox were not detected in the study area during the site visit on November 21, 2013. Based on the results of previous surveys and studies around the SATCOM facility, no active dens are expected to be present in the study area (Army 2014).

Vernal Pool Fairy Shrimp

Potential habitat (e.g., seasonally inundated rain-filled pools) for vernal pool branchiopods was not observed within the study area during the site visit on November 21, 2013, and habitat was not detected in the western expansion area during previous surveys (U.S. Army 2005, Tetra Tech, Inc. and ICF International 2013). Except for the cooling tower discharge area, the study area was dry during the field visit. The cooling tower discharge area is a flowing waterway and is not considered suitable habitat for fairy shrimp (Tetra Tech, Inc. and ICF International 2013). Fairy shrimp have been documented in ruts within roadways on Camp Roberts. Although the potential for fairy shrimp to occur in the study area is considered low, water pooling in dirt roadways during periods of high precipitation could provide habitat for vernal pool branchiopods. Habitat for vernal pool fairy shrimp was not detected at the MET site during the habitat assessment conducted from May 29 to 31, 2013, for the western expansion of the SATCOM site (Tetra Tech, Inc. and ICF International 2013, as cited in Army 2014).

Purple Amole

The only known occurrences of purple amole are from Fort Hunter Liggett and Camp Roberts, the closest of which is located approximately 4 miles to the northwest of the study area. Habitat

is present for purple amole in blue oak woodland and annual grasslands throughout the study area. This species blooms between April and June and was not detectable during the field visit on November 21, 2013. A floristic survey was conducted on May 29 and 30, 2013, as part of the planning-level surveys at the MET site. Purple amole or other special-status plant species were not detected during the survey (Tetra Tech, Inc. and ICF International 2014, as cited in Army 2014). Purple amole has not been documented to occur within the study area (Army 2014).

Avoidance and Minimization Measures

San Joaquin Kit Fox

Protective measures for San Joaquin kit fox have been amended as per coordination between Army and Ventura Fish and Wildlife Office staff. Den destruction, as described in the environmental assessment is no longer proposed in the event dens are found within the project area.

1. Preactivity surveys for the presence of San Joaquin kit fox will be conducted no less than 14 days and no more than 30 days prior to ground-disturbing activities. Surveys will be conducted by qualified biologists in the clear zone and a 150-foot-wide buffer on both sides of the clear zone.
2. Only qualified biologists will conduct preactivity den surveys and other activities that pertain to San Joaquin kit fox. The names and credentials of qualified biologists will be submitted to the Service for review and approval at least 30 days prior to the onset of authorized activities.
3. Disturbance to all potential San Joaquin kit fox dens will be avoided to the maximum extent possible. If a kit fox den is discovered within the project area or within 200 feet of the project boundary, work will stop and the Service will be notified immediately. Under no circumstances will the den be disturbed. The Service will advise the Army on how to proceed.
4. To maintain access for small animals between the existing SATCOM fence and proposed security fence around the NRL antenna site, 6-inch diameter holes will be placed in the fence at ground level at ridge tops and valley areas where kit foxes would most likely be moving. Holes would be placed in the newly extended perimeter fence as well as in the existing perimeter fence to allow animals to pass through the facility or escape if they become trapped.
5. Construction activities will be designed to minimize off-road vehicle traffic and be limited to the smallest possible areas of disturbance. Construction personnel will make use of existing roads, trails, and previously disturbed areas whenever possible. Off-road parking and staging areas should be clearly delineated.

6. All vehicle traffic is subject to a 25-miles-per-hour speed limit, except where posted lower. Nighttime construction activities will be avoided. SATCOM personnel and contractors working at the facility will be educated regarding the need to adhere to the posted speed limits and to slow or stop vehicles when in proximity to animals near roads.
7. To avoid accidental entrapment of animals, the following measures will be implemented:
 - a. All steep-sided excavations greater than 2-feet deep will be equipped with one or more earth or plank escape ramps.
 - b. All excavations will be thoroughly inspected for animals prior to sealing or refilling to avoid accidental burial. Permanent and semi-permanent structures installed in-ground or underground will be constructed so animals will not become trapped within.
 - c. Any pipe, culvert, or similar material with an inside diameter of 4 inches or more will be thoroughly inspected for animals prior to sealing or reconnection. If animals are found inside the materials, the material will not be removed, or moved only once to remove it from the path of construction activity until the animals vacate the area. Pipelines temporarily left open in place will be covered or blocked until work is completed.
8. Contour and restoration of disturbed areas will be performed following conclusion of construction activities. All temporary excavations will be filled in, contoured, and vegetated where practicable, to restore the area to the existing conditions of the site as closely as possible. Permanent and semi-permanent construction will be blended into the surrounding landscape and vegetated where practicable. Local native plant species will be used whenever possible.
9. All trash, especially food-related items, will be deposited in closed containers or bags and regularly moved from the site.
10. Use of pest control substances, such as rodenticides and herbicides, will be in strict accordance with all Federal, State, local, and Army regulations. In the event that San Joaquin kit foxes are sighted or an active den exists within a 1-mile radius of the SATCOM facility, the Army will contact the Service on how to proceed.
11. All construction crews associated with the proposed action will receive environmental awareness training from a qualified biologist before construction begins. The training will include information on all special-status species that may occur in the project area, their habitat, and the need to protect them. Specifically for San Joaquin kit fox, information on its life history, habitat requirements, and photographs of the species will be provided. A fact sheet conveying this information will be prepared for distribution to all contractors, their employees, and military and agency personnel involved in construction.

12. To prevent harassment and mortality of listed species by dogs or cats, pets will not be permitted at the SATCOM site or Camp Roberts at any time. Dogs are only allowed at Camp Roberts if they are used for sheep herding or upland game hunting and must be on post and under strict voice command at all times.

Vernal Pool Fairy Shrimp

1. All construction crews associated with the proposed action will receive environmental awareness training from a qualified biologist before construction begins. The training will include information on all special-status species that may occur in the project area, their habitat, and the need to protect them. A pamphlet on vernal pool fairy shrimp will be available and distributed at the SATCOM facility. The flyer or pamphlet will include a brief description, representative photographs, and legal status of vernal pool fairy shrimp; a description of vernal pool fairy shrimp habitat; the Camp Roberts environmental protection measures for this species including avoiding the placement of obstacles in vernal pool fairy shrimp habitat; and the penalties for not complying with the protection measures. This pamphlet could be combined with information regarding other federally listed species at Camp Roberts
2. To the maximum extent feasible, ground-disturbing training, maintenance, and construction activities will be avoided during the wet season, typically November 1 through April 30. Avoiding ground disturbance during this time will minimize disturbance, degradation, and destruction of potential vernal pool fairy shrimp habitat.
3. All personnel will be advised to stay on established roads and trails. Cross-country travel, especially during the wet season, will be avoided. This information will be provided to contractors and SATCOM employees during all environmental briefings and will be included in the pamphlet discussed above.
4. A qualified biologist will conduct preactivity surveys prior to any activities that involve grading, excavation, or the stockpiling of dirt or materials (any new construction) to determine the potential for the activity to affect vernal pool fairy shrimp. The project area and an appropriate buffer zone will be surveyed. If the species is found within the project area, the Army should coordinate with the Service on avoidance measures. The survey results will be documented in a report that includes a map of the project area showing the location of sensitive species sites and recommendations for avoidance. The U.S. Army will ensure that all workers and equipment operators are informed of the results and areas to be avoided. Areas to be avoided will be flagged, and flagged sites and exclusion zones will be off limits to personnel and equipment. Only the qualified biologist will be able to remove flags and exclusion zones after completion of the project. If vernal pool fairy shrimp are found during surveys and affects to the species or habitat cannot be avoided, work will stop and the Service will be contacted on how to proceed.

Purple Amole

A preactivity survey will be conducted by a qualified botanist for special-status plants. The survey will be conducted in suitable habitat at each individual project area prior to ground disturbing activities, preferably during the blooming period of the species (typically between April and June). If the survey cannot be conducted during the blooming period, the botanist will use the survey to identify areas where the species is most likely to occur and conduct a site-specific assessment to determine suitability of the habitat. If populations or individuals are identified during the survey or are highly suspected to occur in the project area, the Army will coordinate with the Service to determine appropriate avoidance or minimization measures. Such measures may include relocating facilities or realigning the clear zone or work area to avoid the plant(s). If purple amole is found in the project area and cannot be avoided, work in that area will stop and the Service will be contacted on how to proceed.

Conclusion

After reviewing the proposed projects and the associated avoidance and minimization measures, we concur with your determination that the proposed construction projects at the SATCOM site on Camp Roberts may affect, but are not likely to adversely affect the San Joaquin kit fox, vernal pool fairy shrimp, and purple amole. This concurrence is based on survey and report information concluding the low likelihood of these species being in the project area and the proposed avoidance and minimization measures to be implemented during project activities. If circumstances arise indicating that the proposed project may result in adverse effects to any federally protected species, construction activities should be suspended and the Service should be contacted immediately to determine whether additional consultation is required.

The Army also requested concurrence that the proposed project may affect but is not likely to adversely affect the federally protected golden eagle (*Aquila chrysaetos*) and bald eagle (*Haliaeetus leucocephalus*). These species are protected by the Migratory Bird Treaty Act and the Bald and Golden Eagle Act. Take of these species can only be authorized by obtaining the proper permits. Guidance on protection of eagles and other migratory birds can be found at the following links:

<http://www.fws.gov/midwest/MidwestBird/EaglePermits/index.html>

https://birdreport.fws.gov/AVIAN_PROTECTION_PLAN_April2005.pdf

If you have any questions, please contact Lena Chang of my staff at (805) 644-1766, extension 302.

Sincerely,



Douglass M. Cooper
Deputy Assistant Field Supervisor

REFERENCES CITED

- Tetra Tech, Inc. and ICF International. 2014. Satellite communications station planning-level surveys report. Submitted to Presidio of Monterey. March 2014.
- [Army] U.S. Department of the Army. 2015. Draft environmental assessment for multiple construction projects. SATCOM, Camp Roberts, San Luis Obispo County, California. March 2015.
- [Army] U.S. Department of the Army. 2014. Biological resources characterization report for multiple construction projects. SATCOM, Camp Roberts, San Luis Obispo, California. Prepared by North State Resources, Inc. for the U.S. Department of the Army and U.S. Army Corps of Engineers. August 2014.
- [Army] U.S. Department of the Army. 2013. Final supplemental environmental assessment for anti-terrorism force protection measures SATCOM, San Luis Obispo County, California. Prepared by North State Resources, Inc. for the U.S. Department of the Army and U.S. Army Corps of Engineers. April 2013.
- [Army] U.S. Department of the Army. 2005. Area development plan SATCOM complex expansion final programmatic environmental assessment and finding of no significant impact, Camp Roberts, California. Prepared by Jones & Stokes (now ICF International) and Nakata Planning Group, LLC for U.S. Army Network Enterprise Technology Command/9th Army Signal Command.
- Vanherwig, W.J. 2011. Kit fox survey, Camp Roberts: Satellite earth terminal station. Submitted to SATCOM Station. November 28, 2011.

APPENDIX A. Proposed project locations (Army 2015)





REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
UNITED STATES ARMY INSTALLATION MANAGEMENT COMMAND
HEADQUARTERS, UNITED STATES ARMY GARRISON, PRESIDIO OF MONTEREY
DIRECTORATE OF PUBLIC WORKS
BLDG 4463 GIGLING RD – P.O. 5004
MONTEREY, CA 93944-5004

Diane Noda
Executive Field Supervisor
U.S. Fish and Wildlife Service
2493 Portola Road, Suite B
Ventura, California 93003

Dear Ms. Noda:

The purpose of this letter is to request U.S. Fish and Wildlife Service (FWS) concurrence that the proposed construction projects at the Satellite Communications Station (SATCOM) site are not likely to adversely affect the endangered San Joaquin kit fox (*Vulpes macrotis mutica*), threatened vernal pool fairy shrimp (*Branchinecta lynchi*), protected bald eagle (*Haliaeetus leucocephalus*), protected golden eagle (*Aquila chrysaetos*), threatened purple amole (*Chlorogalum purpureum* var. *purpureum*), or critical habitat for the federally listed species. Our determination that the projects will not adversely affect these species is based on the project description, impact analysis, and mitigation measures described in the enclosed Environmental Assessment. The U.S. Army will employ the avoidance and mitigation measures for San Joaquin kit fox and vernal pool fairy shrimp outlined in the 1996 *Biological Opinion for Normal Operations and Construction Activities in Support of the Satellite Communications Facilities at Camp Roberts, San Luis Obispo and Monterey Counties, California* (1-8-96-F-25), as amended, and the California Army National Guard's 2008 *Programmatic Biological Opinion for Multiple Activities at Camp Roberts, San Luis Obispo and Monterey Counties, California* (1-8-08-F-24) during construction activities. In addition, a preactivity survey for the San Joaquin kit fox will be conducted and a copy of the report provided to FWS.

Please review the enclosed Environmental Assessment at your earliest convenience and provide your concurrence. Please contact Ms. Lenore Grover-Bullington at 831-242-7925 or Lenore.r.grover-bullington.civ@mail.mil with any questions regarding this request. We appreciate your continued cooperation and support.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Willison", is written over a circular stamp.

James M. Willison
Director, Public Works

Enclosure



United States Department of the Interior



FISH AND WILDLIFE SERVICE

Ventura Fish and Wildlife Office
2493 PORTOLA ROAD, SUITE B
VENTURA, CA 93003
PHONE: (805)644-1766 FAX: (805)644-3958

Consultation Tracking Number: 08EVEN00-2014-SLI-0136

February 13, 2014

Project Name: SATCOM: Multiple Construction Projects

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project.

To Whom It May Concern:

The enclosed list identifies species listed as threatened and endangered, species proposed for listing as threatened or endangered, designated and proposed critical habitat, and species that are candidates for listing that may occur within the boundary of the area you have indicated using the U.S. Fish and Wildlife Service's (Service) Information Planning and Conservation System (IPaC). The species list fulfills the requirements under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 et seq.). Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the species list should be verified after 90 days. We recommend that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists following the same process you used to receive the enclosed list. Please include the Consultation Tracking Number in the header of this letter with any correspondence about the species list.

Due to staff shortages and excessive workload, we are unable to provide an official list more specific to your area. Numerous other sources of information are available for you to narrow the list to the habitats and conditions of the site in which you are interested. For example, we recommend conducting a biological site assessment or surveys for plants and animals that could help refine the list.

If a Federal agency is involved in the project, that agency has the responsibility to review its proposed activities and determine whether any listed species may be affected. If the project is a major construction project*, the Federal agency has the responsibility to prepare a biological assessment to make a determination of the effects of the action on the listed species or critical habitat. If the Federal agency determines that a listed species or critical habitat is likely to be adversely affected, it should request, in writing through our office, formal consultation pursuant to section 7 of the Act. Informal consultation may be used to exchange information and resolve conflicts with respect to threatened or endangered species or their critical habitat prior to a

written request for formal consultation. During this review process, the Federal agency may engage in planning efforts but may not make any irreversible commitment of resources. Such a commitment could constitute a violation of section 7(d) of the Act.

Federal agencies are required to confer with the Service, pursuant to section 7(a)(4) of the Act, when an agency action is likely to jeopardize the continued existence of any proposed species or result in the destruction or adverse modification of proposed critical habitat (50 CFR 402.10(a)). A request for formal conference must be in writing and should include the same information that would be provided for a request for formal consultation. Conferences can also include discussions between the Service and the Federal agency to identify and resolve potential conflicts between an action and proposed species or proposed critical habitat early in the decision-making process. The Service recommends ways to minimize or avoid adverse effects of the action. These recommendations are advisory because the jeopardy prohibition of section 7(a)(2) of the Act does not apply until the species is listed or the proposed critical habitat is designated. The conference process fulfills the need to inform Federal agencies of possible steps that an agency might take at an early stage to adjust its actions to avoid jeopardizing a proposed species.

When a proposed species or proposed critical habitat may be affected by an action, the lead Federal agency may elect to enter into formal conference with the Service even if the action is not likely to jeopardize or result in the destruction or adverse modification of proposed critical habitat. If the proposed species is listed or the proposed critical habitat is designated after completion of the conference, the Federal agency may ask the Service, in writing, to confirm the conference as a formal consultation. If the Service reviews the proposed action and finds that no significant changes in the action as planned or in the information used during the conference have occurred, the Service will confirm the conference as a formal consultation on the project and no further section 7 consultation will be necessary. Use of the formal conference process in this manner can prevent delays in the event the proposed species is listed or the proposed critical habitat is designated during project development or implementation.

Candidate species are those species presently under review by the Service for consideration for Federal listing. Candidate species should be considered in the planning process because they may become listed or proposed for listing prior to project completion. Preparation of a biological assessment, as described in section 7(c) of the Act, is not required for candidate species. If early evaluation of your project indicates that it is likely to affect a candidate species, you may wish to request technical assistance from this office.

Only listed species receive protection under the Act. However, sensitive species should be considered in the planning process in the event they become listed or proposed for listing prior to project completion. We recommend that you review information in the California Department of Fish and Wildlife's Natural Diversity Data Base. You can contact the California Department of Fish and Wildlife at (916) 324-3812 for information on other sensitive species that may occur in this area.

[*A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological

evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.]

Attachment



United States Department of Interior
Fish and Wildlife Service

Project name: SATCOM: Multiple Construction Projects

Official Species List

Provided by:

Ventura Fish and Wildlife Office
2493 PORTOLA ROAD, SUITE B
VENTURA, CA 93003
(805) 644-1766

Non-participating U.S. Fish and Wildlife Service office(s):

The following office(s) have jurisdictions that overlap your project area, but do not provide automatically generated Species list documents. Please contact them directly to request a Species list document. Do this by visiting their website, if it is provided below. If a website is not provided, contact the office(s) by mail or phone.

Sacramento Fish and Wildlife Office
FEDERAL BUILDING
2800 COTTAGE WAY, ROOM W-2605
SACRAMENTO, CA 95825
(916) 414-6600

Consultation Tracking Number: 08EVEN00-2014-SLI-0136

Project Type: Development

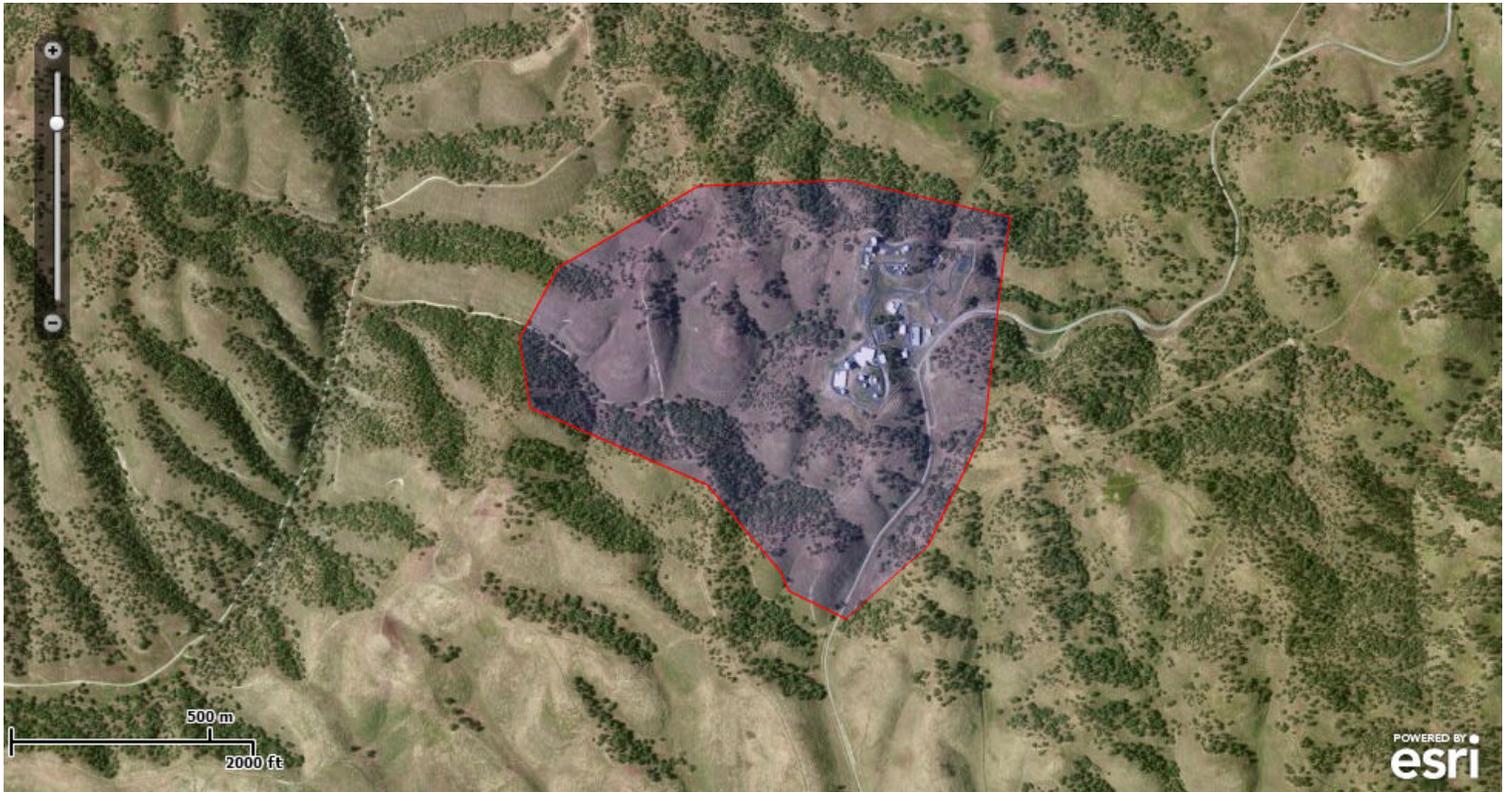
Project Description: The US Army is proposing four projects at the SATCOM facility on Camp Roberts in San Luis Obispo County. The projects include new antenna pads, security systems, parking, and an infiltration gallery for discharged waste water. The proposed projects are needed to facilitate long-term growth and expansion of the SATCOM facility to respond to new technologies and accommodate additional communications needs associated with an enhanced mission definition and modernized equipment systems.



United States Department of Interior
Fish and Wildlife Service

Project name: SATCOM: Multiple Construction Projects

Project Location Map:



Project Coordinates: MULTIPOLYGON (((-120.755317 35.7290204, -120.7569028 35.7296458, -120.7571173 35.7300638, -120.7591773 35.7320495, -120.7641125 35.7337914, -120.7644129 35.735359, -120.7633422 35.7369614, -120.7594369 35.7388093, -120.7553149 35.7389522, -120.7507251 35.7381109, -120.7509354 35.7370432, -120.7514547 35.7333037, -120.7530425 35.7306578, -120.755317 35.7290204)))

Project Counties: San Luis Obispo, CA



United States Department of Interior
Fish and Wildlife Service

Project name: SATCOM: Multiple Construction Projects

Endangered Species Act Species List

There are a total of 9 threatened, endangered, or candidate species on your species list. Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. Critical habitats listed on the **Has Critical Habitat** lines may or may not lie within your project area. See the **Critical habitats within your project area** section further below for critical habitat that lies within your project. Please contact the designated FWS office if you have questions.

California condor (*Gymnogyps californianus*)

Population: Entire, except where listed as an experimental population below

Listing Status: Endangered

Has Critical Habitat: Final designated

California red-legged frog (*Rana draytonii*)

Population: Entire

Listing Status: Threatened

Has Critical Habitat: Final designated

Least Bell's vireo (*Vireo bellii pusillus*)

Population: Entire

Listing Status: Endangered

Has Critical Habitat: Final designated

Marsh Sandwort (*Arenaria paludicola*)

Listing Status: Endangered

Purple amole (*Chlorogalum purpureum*)

Listing Status: Threatened

Has Critical Habitat: Final designated

San Joaquin Kit fox (*Vulpes macrotis mutica*)

Population: U.S.A(CA)

Listing Status: Endangered



United States Department of Interior
Fish and Wildlife Service

Project name: SATCOM: Multiple Construction Projects

Southwestern Willow flycatcher (*Empidonax traillii extimus*)

Population: Entire

Listing Status: Endangered

Has Critical Habitat: Final designated

Spreading navarretia (*Navarretia fossalis*)

Listing Status: Threatened

Has Critical Habitat: Final designated, Proposed

Vernal Pool fairy shrimp (*Branchinecta lynchi*)

Population: Entire

Listing Status: Threatened

Has Critical Habitat: Final designated



United States Department of Interior
Fish and Wildlife Service

Project name: SATCOM: Multiple Construction Projects

Critical habitats that lie within your project area

There are no critical habitats within your project area.

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REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
UNITED STATES ARMY INSTALLATION MANAGEMENT COMMAND
HEADQUARTERS, UNITED STATES ARMY GARRISON, PRESIDIO OF MONTEREY
DIRECTORATE OF PUBLIC WORKS
BLDG 4463 GIGLING RD – P.O. BOX 5004
MONTEREY, CA 93944-5004

DEC 16 2014

Dr. Carol Roland-Nawi
State Historic Preservation Officer
Department of Parks and Recreation
Office of Historic Preservation
1725 23rd Street, Suite 100
Sacramento, CA 94296-0001

**Re: Multiple Construction Projects, Satellite Communications Station, Camp Roberts,
San Luis Obispo County, California**

Dear Dr. Roland-Nawi:

In accordance with Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470f) (NHPA), as amended, and the implementing regulation found at 36 CFR § 800, the United States Army Garrison (USAG), Presidio of Monterey (Presidio), Monterey County, California, is notifying you of a proposed undertaking that has no potential to affect historic properties. The proposed undertaking will occur at the Satellite Communication Station (SATCOM) located within Camp Roberts, San Luis Obispo County. The U.S. Army owns Camp Roberts, but it is licensed to (and managed by) the California Army National Guard (CA ARNG). Within the boundary of Camp Roberts is SATCOM, a separate 81-acre installation that the U.S. Army retains control over and which is managed by the USAG Presidio (Enclosure: Figure 1).

The proposed undertaking consists of four (4) non-contiguous projects: Project 1- the Naval Research Lab (NRL) antenna site, access road and security fence; Project 2- a parking lot along Perimeter Road for the Network Enterprise Technology Command/9th Army Signal Command (NETCOM); Project 3- a discharge system for the cooling towers associated with Building 18000; and, Project 4- a NETCOM Modernization of Enterprise Terminals (MET) antenna site (Enclosure: Figure 2). The undertaking is required to facilitate long-term growth and expansion of the SATCOM facility to respond to new technologies and accommodate additional communications needs associated with an enhanced mission definition and modernized equipment systems.

800.11(d)(1) - Description of the Undertaking and its Area of Potential Effects

The Area of Potential Effects (APE) encompasses approximately 10 acres and includes the proposed work areas associated with all four of the projects (Enclosure: Figure 2). The NRL project (Project 1) would include an antenna pad, access roads, security fence, and utility lines on about 4.6 acres just south of the existing SATCOM facility. The parking lot (Project 2) would include about 40 parking spots on less than 1 acre to the south of the existing SATCOM access gate along Perimeter Road. The discharge system (Project 3) would consist of an infiltration gallery on less than 0.5 acre where wastewater from two cooling towers associated with Building 18000 is currently discharged southwest of the SATCOM facility. The MET site (Project 4)

would be established to install two or three antennas and associated infrastructure on about 3.8 acres west of the SATCOM facility and south of another MET antenna site.

800.11(d)(2) - Description of Steps Taken to Identify Historic Properties

In order to identify historic properties that may be impacted by the undertaking, North State Resources (NSR) was contracted to conduct archival research on the APE, a larger Study Area (i.e., the “Southern Expansion Area” that will not be impacted by construction activities [shaded pink in Figure 2]), as well as land within 0.5 mile of the Study Area (Enclosure: Pages 6-7). Research efforts included a review of literature, cultural resource records, the Presidio Base Comprehensive Plan Geographic Information System, CA ARNG’s Integrated Cultural Resources Management Plan (ICRMP), as well as discussions between Camp Roberts Archaeologist Ethan Bertrando and Presidio Archaeologist Laura Prishmont Quimby.

No resources listed on the National Register of Historic Places (NRHP), the California Register of Historical Resources, the California Historical Landmarks Listing, or the California Points of Historical Interest have been documented within the APE or within 0.5 mile of the Study Area. A review of USGS maps from 1919, 1932, 1942, 1957 and 1968 show that until the 1960’s, little or no development other than the construction of several roadways appears to have occurred within or immediately adjacent to the Study Area (Enclosure: Figures 3a-3c).

In addition to archival research, an intensive cultural resources pedestrian survey was conducted by NSR in 2014. This survey included the APE plus an additional 32 acres (i.e., the Study Area) between the proposed security fence associated with the NRL antenna site expansion (Project 1) and the existing SATCOM facility (Enclosure: Figure 4). NSR prepared an inventory and evaluation report (Enclosure) conforming to Section 106 standards to describe the results of the archival research and the intensive survey utilizing pedestrian transects spaced no more than 15 meters apart. A total of four cultural resources were documented within the Study Area but outside of the APE, to the north of the proposed security fence and west of the proposed NRL antenna pad (Enclosure: Figure 4). These consist of three isolates and one site, NSR-CR-01, which is a concentration of seven shallow depressions with associated steel pipe/bracket features. The isolates (NSR-CR-ISO-01, NSR-CR-ISO-02, and NSR-CR-ISO-03) consist of, respectively, an excavated pit or “foxhole,” a scatter of food/beverage tins, and a single M6 ammunition tin (Enclosure: Appendix A).

As isolated artifacts or features, NSR-CR-ISO-01, -02, and -03, are not eligible for consideration for listing on the NRHP. However as a site, NSR-CR-01 can be considered. Although this site is likely associated with broad patterns of military training at Camp Roberts, existing documentation does not suggest that this site is associated with a specific historically significant individual or important event (NRHP criteria A, B). It also does not appear to be the work of a master, the earliest of its type, or best example of its kind and as a result, does not appear to be eligible for NRHP listing under Criterion C. Lastly, the site’s data potential has likely been realized through the current level of documentation, and it is recommended not eligible for listing on the NRHP under Criterion D. In addition, assuming the site served as part of the Camp Roberts training facility sometime between about 1940 and the early 1970s, the fragmentary nature of the depressions and associated pipes and brackets suggests a more substantial structure or series of structures once existed here but has subsequently been dismantled. Such a lack of historic integrity also indicates the site is not eligible for NRHP listing.

800.2(c) - Views of Consulting Parties

The Presidio maintains a consulting party relationship with the Santa Ynez Band of Chumash Indians (Chumash) for undertakings occurring at SATCOM. Consistent with 36 CFR § 800.2(c), Presidio Archaeologist Laura Prishmont Quimby met on-site with the Chumash's Cultural Resources Coordinator Mr. Freddie Romero on December 9, 2014. After walking the four project areas, Mr. Romero requested that a Native American consultant be on-site during construction to monitor ground disturbance associated with this undertaking. This written consultation has been sent to the Tribe in order to offer them an additional opportunity to comment.

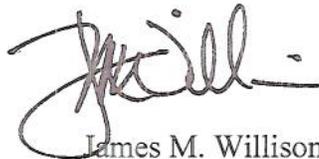
In addition to consulting with the Tribe under Section 106 of the NHPA, this undertaking will also be reviewed by the public and other stakeholders as required under the National Environmental Policy Act as part of an environmental assessment.

800.11(d)(3) - Basis of Determination: No Historic Properties Affected

Archival research and intensive pedestrian archaeological survey confirms that no historic properties are present within the APE; therefore, the Presidio has determined a finding of No Historic Properties Affected for the undertaking. In the event of an inadvertent discovery of cultural resources during construction, actions specified in 36 CFR 800.13 and in the Presidio's ICRMP will be implemented, which would include follow on consultation with the Chumash and the CA State Historic Preservation Officer.

The Presidio requests your concurrence with our determination of No Historic Properties Affected for the proposed undertaking. Your receipt and concurrence constitutes satisfactory evidence of the Presidio's compliance with Section 106 of the NHPA. If you have any questions, please contact Ms. Laura Prishmont Quimby (laura.a.prishmontquimby.civ@mail.mil; 831-242-7926).

Sincerely,



James M. Willison
Director, Public Works
Presidio of Monterey

Enclosure

CF:
California Army National Guard, Camp Roberts

**OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION**

1725 23rd Street, Suite 100
SACRAMENTO, CA 95816-7100
(916) 445-7000 Fax: (916) 445-7053
calshpo@parks.ca.gov
www.ohp.parks.ca.gov



January 14, 2015

Reply In Reference To: USA_2014_1217_001

James M. Willison, Director
Directorate of Public Works
U. S. Army installation Management Command
HQ, U.S. Army Garrison, Presidio of Monterey
P. O. Box 5004
Monterey, CA 93944-5004

RE: Multiple Construction Projects, Satellite Communications Station, Camp Roberts,
San Luis Obispo County, California (your letter of December 16, 2014)

Dear Mr. Willison:

Thank you for requesting my comments on the above cited undertaking, in accordance with Section 106 of the *National Historic Preservation Act*, as amended. The U. S. Army Garrison, Presidio of Monterey (USAG-PM) proposes to construct four non-contiguous projects at the Satellite Communications Station (SATCOM) located within Camp Roberts (Camp). The proposed undertaking is required to facilitate long-term growth and expansion of the SATCOM facility to respond to new technologies and accommodate additional communications needs associated with an enhanced mission definition and modernized equipment systems.

The proposed undertaking will include the following components:

- Project 1: Naval Research Lab site – will involve the construction of a new antenna pad, access road, security fence, and utility lines on approximately 4.6 acres;
- Project 2: construction of a parking lot containing approximately 40 parking spots on less than one acre located to the south of the existing SATCOM access gate along Perimeter Road;
- Project 3: construction of a discharge system that would include an infiltration gallery on less than 0.5 acres where wastewater from two cooling towers associated with Building 18000 is currently discharged southwest of the SATCOM facility; and
- Project 4: installation of two or three antennas and associated infrastructure at a new NETCOM Modernization of Enterprise Terminals (MET) antenna site on approximately 3.8 acres west of the SATCOM facility and south of another MET antenna site.

The area of potential effect (APE) has been identified as containing approximately ten acres and includes all of the components identified above. A Study Area, which consists of approximately 43 acres, was included also in both the records review and the pedestrian survey. The APE for Project 1 is located within the Study Area, while the APEs for Projects 2 – 4 are located outside of or adjacent to the Study Area. Ground disturbing activities will only occur in the APEs of the four projects, as described above. The Study Area was surveyed because it is a potential expansion area for future projects.

As documentation for your finding of effect, you provided a report entitled: *Multiple Construction Projects, Cultural Resources Inventory and Evaluation Report, SATCOM, Camp Roberts, San Luis Obispo County, California*, dated July 2014. The report was prepared by Dr. Brian Ludwig

(North State Resources, Inc.). A records review was conducted of the Camp's Cultural Resource Management Database and various State of California databases, which identified the following:

1. All of the APE had been surveyed five times since 2005 with negative results;
2. No cultural resources were identified as being located within the APE;
3. One historic site and three isolates are located within an ½-mile radius of the APE, but none will be affected by the proposed project; and
4. A review of four historic USGS maps showed that until the 1960s, little or no development other than the construction of several roads appears to have occurred within or adjacent to the APE.

Archaeologists from North State Resources, Inc. conducted a pedestrian survey of the APE on March 6 & 7, 2014 with negative results.

On December 9, 2014, the USAG-PM conducted a site tour of the APE with the Santa Ynez Band of Chumash Indians. After the tour, Freddie Romero, Cultural Resource Coordinator, requested that a Native American monitor be present on-site during construction to monitor ground disturbance associated with this proposed undertaking.

Based on the records review, the pedestrian survey, and the tribal consultation, the USAG-PM has concluded a finding of No Historic Properties Affected is appropriate for this proposed undertaking and has requested my concurrence with that finding.

My staff has reviewed the documentation you provided and I would like to offer the following comments:

- I have no objections to your identification and delineation of the APE, pursuant to 36 CFR Parts 800.4(a)(1) and 800.16(d);
- Acknowledging the request from Mr. Romero, I recommend that a Native American monitor be present for all ground disturbing activities associated with the proposed undertaking; and
- I concur with your finding of No Historic Properties Affected and believe that it is appropriate for this proposed undertaking, and I would not object to the USAG-PM approving it.

Be advised that under certain circumstances, such as an unanticipated discovery or a change in project description, you may have additional future responsibilities for this undertaking under 36 CFR Part 800. Should you encounter cultural artifacts during ground disturbing activities, please halt all work until a qualified archaeologist can be consulted on the nature and significance of such artifacts.

Thank you for seeking my comments and considering historic properties as part of your project planning. If you have any questions or concerns, please contact the following member of my staff: Tristan Tozer at (916) 445-7027 or via e-mail at Tristan.Tozer@parks.ca.gov.

Sincerely,



Jenan Saunders
(for) Carol Roland-Nawi, PhD
State Historic Preservation Officer



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
UNITED STATES ARMY INSTALLATION MANAGEMENT COMMAND
HEADQUARTERS, UNITED STATES ARMY GARRISON, PRESIDIO OF MONTEREY
DIRECTORATE OF PUBLIC WORKS
BLDG 4463 GIGLING RD - P.O. BOX 5004
MONTEREY, CA 93944-5004

DEC 16 2014

Vincent Armenta, Tribal Chairman
Santa Ynez Band of Chumash Indians
100 Via Juana
Santa Ynez, CA 93460

**Re: Multiple Construction Projects, Satellite Communications Station, Camp Roberts,
San Luis Obispo County, California**

Dear Mr. Armenta:

In accordance with Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470f) (NHPA), as amended, and the implementing regulation found at 36 CFR § 800, the United States Army Garrison (USAG), Presidio of Monterey (Presidio), Monterey County, California, is notifying you of a proposed undertaking that has no potential to affect historic properties. The proposed undertaking will occur at the Satellite Communication Station (SATCOM) located within Camp Roberts, San Luis Obispo County. The U.S. Army owns Camp Roberts, but it is licensed to (and managed by) the California Army National Guard (CA ARNG). Within the boundary of Camp Roberts is SATCOM, a separate 81-acre installation that the U.S. Army retains control over and which is managed by the USAG Presidio (Enclosure: Figure 1).

The proposed undertaking consists of four (4) non-contiguous projects: Project 1- the Naval Research Lab (NRL) antenna site, access road and security fence; Project 2- a parking lot along Perimeter Road for the Network Enterprise Technology Command/9th Army Signal Command (NETCOM); Project 3- a discharge system for the cooling towers associated with Building 18000; and, Project 4- a NETCOM Modernization of Enterprise Terminals (MET) antenna site (Enclosure: Figure 2). The undertaking is required to facilitate long-term growth and expansion of the SATCOM facility to respond to new technologies and accommodate additional communications needs associated with an enhanced mission definition and modernized equipment systems.

800.11(d)(1) - Description of the Undertaking and its Area of Potential Effects

The Area of Potential Effects (APE) encompasses approximately 10 acres and includes the proposed work areas associated with all four of the projects (Enclosure: Figure 2). The NRL project (Project 1) would include an antenna pad, access roads, security fence, and utility lines on about 4.6 acres just south of the existing SATCOM facility. The parking lot (Project 2) would include about 40 parking spots on less than 1 acre to the south of the existing SATCOM access gate along Perimeter Road. The discharge system (Project 3) would consist of an infiltration gallery on less than 0.5 acre where wastewater from two cooling towers associated with Building 18000 is currently discharged southwest of the SATCOM facility. The MET site (Project 4)

would be established to install two or three antennas and associated infrastructure on about 3.8 acres west of the SATCOM facility and south of another MET antenna site.

800.11(d)(2) - Description of Steps Taken to Identify Historic Properties

In order to identify historic properties that may be impacted by the undertaking, North State Resources (NSR) was contracted to conduct archival research on the APE, a larger Study Area (i.e., the “Southern Expansion Area” that will not be impacted by construction activities [shaded pink in Figure 2]), as well as land within 0.5 mile of the Study Area (Enclosure: Pages 6-7). Research efforts included a review of literature, cultural resource records, the Presidio Base Comprehensive Plan Geographic Information System, CA ARNG’s Integrated Cultural Resources Management Plan (ICRMP), as well as discussions between Camp Roberts Archaeologist Ethan Bertrando and Presidio Archaeologist Laura Prishmont Quimby.

No resources listed on the National Register of Historic Places (NRHP), the California Register of Historical Resources, the California Historical Landmarks Listing, or the California Points of Historical Interest have been documented within the APE or within 0.5 mile of the Study Area. A review of USGS maps from 1919, 1932, 1942, 1957 and 1968 show that until the 1960’s, little or no development other than the construction of several roadways appears to have occurred within or immediately adjacent to the Study Area (Enclosure: Figures 3a-3c).

In addition to archival research, an intensive cultural resources pedestrian survey was conducted by NSR in 2014. This survey included the APE plus an additional 32 acres (i.e., the Study Area) between the proposed security fence associated with the NRL antenna site expansion (Project 1) and the existing SATCOM facility (Enclosure: Figure 4). NSR prepared an inventory and evaluation report (Enclosure) conforming to Section 106 standards to describe the results of the archival research and the intensive survey utilizing pedestrian transects spaced no more than 15 meters apart. A total of four cultural resources were documented within the Study Area but outside of the APE, to the north of the proposed security fence and west of the proposed NRL antenna pad (Enclosure: Figure 4). These consist of three isolates and one site, NSR-CR-01, which is a concentration of seven shallow depressions with associated steel pipe/bracket features. The isolates (NSR-CR-ISO-01, NSR-CR-ISO-02, and NSR-CR-ISO-03) consist of, respectively, an excavated pit or “foxhole,” a scatter of food/beverage tins, and a single M6 ammunition tin (Enclosure: Appendix A).

As isolated artifacts or features, NSR-CR-ISO-01, -02, and -03, are not eligible for consideration for listing on the NRHP. However as a site, NSR-CR-01 can be considered. Although this site is likely associated with broad patterns of military training at Camp Roberts, existing documentation does not suggest that this site is associated with a specific historically significant individual or important event (NRHP criteria A, B). It also does not appear to be the work of a master, the earliest of its type, or best example of its kind and as a result, does not appear to be eligible for NRHP listing under Criterion C. Lastly, the site’s data potential has likely been realized through the current level of documentation, and it is recommended not eligible for listing on the NRHP under Criterion D. In addition, assuming the site served as part of the Camp Roberts training facility sometime between about 1940 and the early 1970s, the fragmentary nature of the depressions and associated pipes and brackets suggests a more substantial structure or series of structures once existed here but has subsequently been dismantled. Such a lack of historic integrity also indicates the site is not eligible for NRHP listing.

800.2(c) - Views of Consulting Parties

The Presidio maintains a consulting party relationship with the Santa Ynez Band of Chumash Indians (Chumash) for undertakings occurring at SATCOM. Consistent with 36 CFR § 800.2(c), Presidio Archaeologist Laura Prishmont Quimby met on-site with the Chumash's Cultural Resources Coordinator Mr. Freddie Romero on December 9, 2014. After walking the four project areas, Mr. Romero requested that a Native American consultant be on-site during construction to monitor ground disturbance associated with this undertaking.

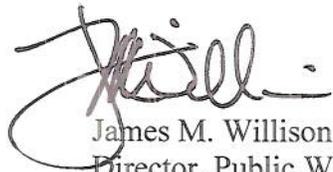
In addition to consulting with the Chumash under Section 106 of the NHPA, this undertaking will also be reviewed by the public and other stakeholders as required under the National Environmental Policy Act as part of an environmental assessment.

800.11(d)(3) - Basis of Determination: No Historic Properties Affected

Archival research and intensive pedestrian archaeological survey confirms that no historic properties are present within the APE; therefore, the Presidio has determined a finding of No Historic Properties Affected for the undertaking. In the event of an inadvertent discovery of cultural resources during construction, actions specified in 36 CFR 800.13 and in the Presidio's ICRMP will be implemented, which would include follow on consultation with the Chumash and the CA State Historic Preservation Officer.

Consistent with 36 CFR§ 800.2(c), the USAG Presidio is submitting this written consultation to you in the event your Tribe has additional comments and/or recommendations regarding this undertaking. Your input will be useful for the purpose of project planning and can remain confidential if requested. Please note that you may submit your comments by mail, e-mail, or phone. Laura Prishmont Quimby will be contacting you by phone to ensure you have received this letter and to answer any questions that you may have regarding this project. If you wish to contact Ms. Prishmont Quimby directly, you may do so at (831) 242-7926 or email: laura.a.prishmontquimby.civ@mail.mil. Thank you for your kind attention to this matter.

Sincerely,



James M. Willison
Director, Public Works
Presidio of Monterey

Enclosure

CF:
California Army National Guard, Camp Roberts

MEMORANDUM FOR RECORD

SUBJECT: Native American Consultation with the Santa Ynez Band of Chumash Indians Regarding Proposed "Multiple Construction Projects" at SATCOM

1. AR 200-1 and Section 106 of the National Historic Preservation Act requires the Army to consult with Native American tribes when a proposed undertaking may have an effect on the environment. The USAG Presidio of Monterey (Presidio) maintains a consulting party relationship with the federally recognized Santa Ynez Band of Chumash Indians (Chumash) for undertakings occurring at SATCOM.
2. Consistent with 36 CFR § 800.2(c), the Presidio's Native American Liaison, Laura Prishmont Quimby, met on-site with the Chumash's Cultural Resources Coordinator, Mr. Freddie Romero, on December 9, 2014 to discuss the subject undertaking. After walking the four proposed project areas, Mr. Romero requested that a Native American consultant be on-site during construction to monitor ground disturbance associated with this undertaking.

LAURA PRISHMONT QUIMBY
Native American Liaison
USAG Presidio of Monterey

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Draft EA Comment Letters and Responses



Air Pollution Control District
San Luis Obispo County

Letter 1

April 29, 2015

Lenore Grover-Bullington
Directorate of Public Works, Environmental Division
U.S. Army Garrison, Presidio of Monterey
P.O. Box 5004
Monterey, CA 93944-5004

SUBJECT: APCD Comments Regarding the Camp Roberts Finding of no Significant Impact for Multiple SATCOM Construction Projects

Dear Ms. Grover-Bullington,

Thank you for including the San Luis Obispo County Air Pollution Control District (APCD) in the environmental review process. We have completed our review of the Draft Environmental Assessment (DEA) for the proposed projects located on an existing 24-acre Satellite Communications (SATCOM) site at the southern end of Camp Roberts in San Luis Obispo County (APN 027-401-020). The projects consists of the following: 1) the SATCOM expansion to the south for construction of a Naval Research Lab (NRL) antenna pad and security fence, 2) a parking lot along Perimeter Road for the Network Enterprise Technology Command/9th Army Signal Command (NETCOM), 3) a discharge system for the cooling towers that provide cooling for Building 18000, and 4) a Modernization of Enterprise Terminals (MET) site future expansion for NETCOM. The DEA states that the "proposed action would facilitate long-term growth and expansion of the SATCOM facility to respond to new technologies and accommodate additional communications needs associated with an enhanced mission definition and modernized equipment systems."

The NRL project would include an antenna pad, access roads, security fence, and utility lines on about 4.6 acres just south of the existing SATCOM site. The parking lot would include about 40 parking spots on less than 1 acre to the south of the existing SATCOM access gate. The discharge system would consist of an infiltration gallery on less than 0.5 acre where wastewater from two cooling towers that provide cooling for Building 18000 is currently discharged to land southwest of the SATCOM site. The MET site would be established to install two or three future antennas and associated infrastructure on about 3.8 acres west of the SATCOM site and south of another MET antenna site. *The following are APCD comments that are pertinent to this project.*

GENERAL COMMENTS

As a commenting agency in the California Environmental Quality Act (CEQA) review process for a project, the APCD assesses air pollution impacts from both the construction and operational phases of a project, with separate significant thresholds for each. **Please**

address the action items contained in this letter that are highlighted by bold and underlined text.

CONSTRUCTION PHASE IMPACTS - Exceeds Threshold

The DEA for this project considered the air quality impacts if the four different construction projects were to occur simultaneously and concludes the impacts would be less than the APCD's construction phase thresholds of significances identified in Table 2-1 of the CEQA Air Quality Handbook (available at the APCD web site: <http://slocleanair.org/business/landuseceqa.php>) with the exception of unmitigated fugitive dust. The APCD concurs with this worst case assessment and recognizes that it is not likely that the four projects would occur simultaneously. Beyond the DEA's Air Mitigation Measures (AMM) 1 to 6 to address fugitive dust, the APCD recommends the following regulatory AMMs be added to the final EA:

Fugitive Dust

In addition to AMM 1 to 6 which are consistent with the APCD's fugitive dust mitigation measures for projects that could exceed 4-acres in size, the APCD also recommends the following additional fugitive dust AMM:

Since water use is a concern due to drought conditions, these SATCOM projects shall implement the use of an APCD-approved dust suppressant(s) to reduce the amount of water used for fugitive dust control. For a list of suppressants, see Section 4.3 of the CEQA Air Quality Handbook that can be accessed at the following website:
<http://slocleanair.org/business/landuseceqa.php>.

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Naturally Occurring Asbestos

Naturally occurring asbestos (NOA) has been identified by the state Air Resources Board as a toxic air contaminant. Serpentine and ultramafic rocks are very common throughout California and may contain naturally occurring asbestos. The SLO County APCD has identified areas throughout the County where NOA may be present (see the APCD's 2012 CEQA Handbook, Technical Appendix 4.4). If the project site is located in a candidate area for Naturally Occurring Asbestos (NOA), the following requirements apply. Under the ARB Air Toxics Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations (93105), **prior to any construction activities at the site, the project proponent shall ensure that a geologic evaluation is conducted to determine if the area disturbed is exempt from the regulation. An exemption request must be filed with the APCD.** If the site is not exempt from the requirements of the regulation, the applicant must comply with all requirements outlined in the Asbestos ATCM. This may include development of an Asbestos Dust Mitigation Plan and an Asbestos Health and Safety Program for approval by the APCD. More information on NOA can be found at <http://www.slocleanair.org/business/asbestos.php>.

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Demolition of Asbestos Containing Materials

Demolition activities can have potential negative air quality impacts, including issues surrounding proper handling, demolition, and disposal of asbestos containing material (ACM). Asbestos containing materials could be encountered during the demolition or remodeling of existing buildings or the disturbance, demolition, or relocation of above or below ground utility pipes/pipelines (e.g., transite pipes or insulation on pipes). **If this project will include any of these activities, then it**

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may be subject to various regulatory jurisdictions, including the requirements stipulated in the National Emission Standard for Hazardous Air Pollutants (40CFR61, Subpart M - asbestos NESHAP). These requirements include, but are not limited to: 1) written notification, within at least 10 business days of activities commencing, to the APCD, 2) asbestos survey conducted by a Certified Asbestos Consultant, and, 3) applicable removal and disposal requirements of identified ACM. Please contact the APCD Enforcement Division at (805) 781-5912 for further information.

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cont.

Developmental Burning

The DEA proposes that the projects will include the construction of fences in compliance with Army Regulations for Physical Security. These fences would require the establishment of a 40-foot-wide zone that would be cleared of all vegetation and debris above 8 inches tall and graded/leveled to allow visibility along the fence. The DEA states that, "vegetation and other debris removed during fence installation and establishment of the clear zone would be properly disposed of or recycled/reused if feasible." **Relative to the disposal of vegetative material associated with the fence construction for this project, effective February 25, 2000, the APCD prohibited developmental burning of vegetative material within San Luis Obispo County.** If you have any questions regarding these requirements, contact the APCD Enforcement Division at 781-5912.

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Construction Permit Requirements

Based on the information provided, we are unsure of the types of equipment that may be present during the project's construction phase. Portable equipment, 50 horsepower (hp) or greater, used during construction activities may require California statewide portable equipment registration (issued by the California Air Resources Board) or an APCD permit.

The following list is provided as a guide to equipment and operations that may have permitting requirements, but should not be viewed as exclusive. For a more detailed listing, refer to the Technical Appendices, page 4-4, in the APCD's 2012 CEQA Handbook.

- Power screens, conveyors, diesel engines, and/or crushers;
- Portable generators and equipment with engines that are 50 hp or greater; and
- Internal combustion engines.

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To minimize potential delays, prior to the start of the project, please contact the APCD Engineering Division at (805) 781-5912 for specific information regarding permitting requirements.

OPERATIONAL PHASE IMPACTS - Below Threshold

The DEA states that the "operational emissions associated with the four construction projects would be minimal and limited to indirect emissions associated with electricity use, minor increases in vehicle emissions from the additional personnel needed to operate and maintain the facilities, and periodic direct emissions from vehicle use along access roads and during security patrols or maintenance along the expanded security fence." The APCD concurs that the operational phase impacts will be less than the APCD's operational phase thresholds of significance identified in Table 3-2 of the CEQA Air Quality Handbook. **Therefore, with the exception of the requirements below, the APCD is not requiring other operational phase mitigation measures for this project.**

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Operational Permit Requirements

Based on the information provided, we are unsure of the types of equipment that may be present at the site. Operational sources may require APCD permits. The following list is provided as a guide to equipment and operations that may have permitting requirements, but should not be viewed as exclusive. For a more detailed listing, refer to the Technical Appendix, page 4-4, in the APCD's 2012 CEQA Handbook.

- Portable generators and equipment with engines that are 50 hp or greater;
- Electrical generation plants or the use of standby generator;
- Public utility facilities;
- Internal combustion engines; and
- Cogeneration facilities.

Most facilities applying for an Authority to Construct or Permit to Operate with stationary diesel engines greater than 50 hp, should be prioritized or screened for facility wide health risk impacts. A diesel engine-only facility limited to 20 non-emergency operating hours per year or that has demonstrated to have overall diesel particulate emissions less than or equal to 2 lb/yr does not need to do additional health risk assessment. **To minimize potential delays, prior to the start of the project, please contact the APCD Engineering Division at (805) 781-5912 for specific information regarding permitting requirements.**

Again, thank you for the opportunity to comment on this proposal. If you have any questions or comments, feel free to contact me at 781-5912.

Sincerely,



Andy Mutziger
Air Quality Specialist

AJM/arr

cc: Tim Fuhs, Enforcement Division, APCD
Gary Willey, Engineering Division, APCD

RESPONSES TO COMMENTS: LETTER 1

- 1-1 The use of dust suppressants instead of water will be included as an option for the contractors. Air Measure-2 has been modified to include this option.
- 1-2 The U.S. Army will evaluate the potential for naturally occurring asbestos in the soils/geologic units where ground disturbance is proposed. If asbestos is found to be a concern, the contractor(s) will comply with the Asbestos Air Toxic Control Measures established by the State.
- 1-3 Demolition activities are not anticipated as part of the four construction projects. A small section of drainage pipe would be replaced as part of the cooling tower project (Project 3). If asbestos is identified as a concern, the U.S. Army will comply with reporting and removal requirements of the Air Pollution Control District.
- 1-4 None of the construction projects includes burning, and Camp Roberts and SATCOM are not likely to authorize vegetation or other burning as part of the projects.
- 1-5 The U.S. Army will obtain all required permits for construction equipment prior to initiating construction activities for the construction project(s) that require the equipment.
- 1-6 The U.S. Army will obtain all required permits for operation equipment prior to use of the equipment for the construction project(s) that require the equipment.

Multiple Construction Projects, SATCOM, Camp Roberts

Document Review: Draft EA

Date: March 2015

No.	Chapter/ Section	Page #	Line #	Reviewer	Comment	
1.	3	3-18	First bullet	PF	Per the CR PBO (2009), potential SJKF dens are considered 6 inches in size. Suggest adjusting for consistency with CR PBO	2-1
2.	3	3-19	Second Bullet	PF	Per USFWS concurrence letter (Dec 2014), CR speed limit has recently been increased to 35 mph on most areas of the installation (aside from roads near SATCOM and Range Control). Suggest adjusting wording for consistency	2-2
3.				EB	Map of Camp Roberts boundaries is wrong	2-3
4.				EB	Was a viewshed analysis completed for the Ranch House or the Soldiers Bowl?	2-4
5.				EB	A reference to the adjacent archaeological surveys should be provided for clarification of negative results.	2-5
6.				EB	Can assigned trinomials be used instead of temporary designation?	2-6
7.				EB	Is there a list of interested parties contacted? (non-fedrec, arch/hist organizations etc.)	2-7
8.	1	7		MEW	Figure 1, Boundary of Camp Roberts is out of date.	2-8
9.	3	42		MEW	Do you need to discuss water use for construction? In the past I have heard some very large numbers for water use during construction. ⁴	2-9
10.	4	2		MEW	Number 6, I am not sure this comment is correct about additional land north of McMillan, land south of McMillan has been added to the ACUB program, please confirm comment.	2-10
11.	Appendix A			JEM	USFWS List is from February 2014, suggest inserting recent one to comply with legal requirements	2-11
12.		ES-6		JEM		
13.		ES-6		JEM	Propose deleting “or seedlings” from sentence “ If 3:1 survivorship ratio (i.e. three surviving trees <i>or seedlings</i> for each tree removed). Replacement planting will be 1-5 gallon container plantings or equivalent, therefore seedlings will be natural recruitment (not mitigation)..	2-12
14.		ES-6		JEM	“..project proponent will provide annual monitoring report”, but does not state to whom and by what date due each year.	2-13
15.	4	4-5		JEM	The statement “The topography and oak woodlands surrounding the SATCOM site make it minimally visible from other areas of Camp Roberts...” does not seem accurate. Should verify or suggest change wording	2-14
16.	4	4-3		JEM	Citing use of mitigation measures for SJKF in the CR Programmatic that does not address these projects. Earlier in document, it is stated that concurrence (NLAA) will be obtained. Suggest adding that here and determination statement. Add period at end of paragraph.	2-15
17.	3	3-38		JEM	Geo Meausre 3 - Change re-vegetation should to will and follow Camp Roberts policy. Seed mix should be approved by Camp Roberts biologist.	2-16

RESPONSES TO COMMENTS: LETTER 2

- 2-1 The size of kit fox dens was corrected in Bio Measure 3 in the Final EA.
- 2-2 The clarification of speed limits was added to Bio Measure 3 in the Final EA.
- 2-3 Figure 1 was updated with a revised boundary for Camp Roberts in the Final EA.
- 2-4 No visual analysis was conducted for any of the construction projects.
- 2-5 The cultural resources report prepared for the construction projects provides additional information on adjacent surveys. A copy of the report can be provided upon request.
- 2-6 Trinomials were not assigned for the resources discovered during the survey effort associated with the construction projects.
- 2-7 The Draft EA Distribution List, contained in Appendix A of the EA, identifies the parties that were sent a copy of or notice of the availability of the Draft EA. The Santa Ynez Band of Chumash Indians was consulted on the four construction projects; a copy of the letter sent to the tribe is included in Appendix A. For additional information on the tribal consultation, please contact Laura Prishmont-Quimby at the Presidio of Monterey.
- 2-8 See response to comment 2-3.
- 2-9 Specific details on water use estimates for construction of each of the projects are not currently available.
- 2-10 The direction of McMillan Airfield in relation to the SATCOM site was clarified to be to the south in the Final EA.
- 2-11 The USFWS list included in Appendix A is the official list obtained from the USFWS. The information remains valid.
- 2-12 The words “or seedlings” have been removed from the statement in Bio Measure 1 in the Final EA.
- 2-13 Specific details on the annual monitoring required under Bio Measure 1 will be determined on a project-by-project basis at the time of the mitigation in coordination with USAG POM, Camp Roberts, SATCOM, and other appropriate parties.
- 2-14 The statement has been deleted in the Final EA.

- 2-15 The cumulative impact discussion for San Joaquin kit fox has been clarified to refer to applicable measures from the existing Programmatic Biological Opinion for Camp Roberts and the Standard Recommendations from USFWS, as well as any project-specific consultation measures.
- 2-16 Geo Measure 3 has been updated in the Final EA to address the comment.

RESPONSES TO COMMENTS: INTERNAL COMMENT

- I-1. Table ES-1 and related sections updated to clarify required mitigations, consultation requirements, permit conditions, installation plan commitments, and/or best management practices for resource areas.