

**FINDING OF NO SIGNIFICANT IMPACT
FOR
PROPOSED LONG-TERM PERMIT AND INSTALLATION DEVELOPMENT PLAN
FOR THE 129TH RESCUE WING
CALIFORNIA AIR NATIONAL GUARD
MOFFETT FIELD, CALIFORNIA**

PURPOSE: The Purpose of the Proposed Action is to consolidate the 129th Rescue Wing (129 RQW) facilities to the extent possible, while providing the necessary functional areas required for the 129 RQW mission. The Proposed Action is necessary to reconfigure facilities and property to accommodate the mission of the 129 RQW and to implement Anti-Terrorism/Force Protection (AT/FP) requirements. Furthermore, this action is necessary because the National Aeronautics and Space Administration (NASA) has stated in the NASA Ames Development Plan and associated Programmatic Environmental Impact Statement (EIS) and Record of Decision (ROD) (2002) that it may eventually open up the NASA Research Park (on the west side of the runway) and the Eastside/Airfield (east of the runway) to the public. The Proposed Action will provide the 129 RQW with properly sized and configured facilities, as described in Air National Guard (ANG) Handbook 32-1084, *Facility Requirements*, which are required to effectively accomplish their mission. The new facilities will enhance the 129 RQW's ability to maintain a level of wartime readiness necessary to support the mission.

ALTERNATIVE #1 (Preferred Alternative): The 129 RQW currently occupies 7 parcels, 88 facilities and 51 buildings at Moffett Field; the remainder of Moffett Field is in use by NASA and their other tenants. NASA has plans to eventually open the NASA Research Park (on the west side of the runway) and the Eastside/Airfield (east of the runway) to the public, consistent with the NASA Ames Development Plan and associated Programmatic EIS and ROD (2002). This would create an unsecured installation for the 129 RQW, which is not compliant with AT/FP requirements. As a result, the 129 RQW will consolidate their facilities to the extent practicable. In so doing, the 129 RQW will enter into a long-term permit with NASA for the property they currently occupy and an additional parcel they propose to acquire for the construction of a new Munitions Storage Complex (MSC). In addition, the 129 RQW will remedy some of their functional space shortfalls by vacating certain facilities and constructing some new facilities that will meet the authorized square footage requirements per ANG Handbook 32-1084, *Facility Requirements*, as necessary. California Air National Guard (CAANG) operations in areas to be described as shared use in the proposed permit (e.g., the taxiway near Runway 32R and temporary use areas) would be within the scope of the existing National Environmental Policy Act (NEPA) documentation. These collective actions will allow NASA Ames Research Center (ARC) (as property holder) to promote economical and efficient use of facilities and allow the 129 RQW to carry out their mission more effectively.

The Proposed Action is not inconsistent with the goals of other federal agencies. It is consistent with approved state and local plans. The Proposed Action consolidates and reconfigures

facilities and operations within the existing footprint without substantially increasing the level of operations as described in the 2002 NASA Ames Development Plan Programmatic EIS and ROD.

Alternative #1 consolidates the main cantonment area into one contiguous parcel, provides an area for the construction of the new Munitions Storage Complex, and satisfies parking requirements. Therefore, Alternative #1 is the preferred alternative.

ALTERNATIVE #2: Under Alternative #2, all construction and demolition projects proposed for Alternative #1 would be implemented; however, the additional parcel that would be acquired for the new MSC would be sited in a different location on the installation. This alternative would consolidate the CAANG facilities into two non-contiguous parcels and would also satisfy parking requirements. Since Alternative #2 would consolidate the CAANG into two non-contiguous parcels it would not be the preferred alternative.

Alternative #2 is not inconsistent with the goals of other federal agencies. It is consistent with approved state and local plans. Alternative #2 consolidates and reconfigures facilities and operations within the existing footprint without substantially increasing the level of operations as described in the 2002 NASA Ames Development Plan Programmatic EIS and ROD.

ALTERNATIVE #3: Under Alternative #3, all construction and demolition projects described in Alternative #1 would be implemented, with the exception of the pervious parking area proposed for the east side of Macon Road (part of Project #13) and the photovoltaic generation system that is associated with it (Project #14). The 129 RQW would instead use the existing parking garages located in the Moffett Towers development east of Mary Street for additional parking to support Unit Training Assembly (UTA) on the weekends. To facilitate parking off-installation at the Moffett Towers development, a new entrance gate would be installed near the intersection of Mary Street and 11th Avenue. A roadway extension connecting 11th Avenue to Macon Road would also be developed and would be approximately 68 feet wide and 140 feet long (approximately 9,520 square feet [SF] of additional impervious surface). Sidewalks, curbs, and gutters would also be included in this roadway extension.

The 129 RQW has been actively engaged in discussions with the owners of Moffett Towers to determine the feasibility of this alternative. However, following development and analysis of this alternative by the 129 RQW, Moffett Tower's management signaled they would not enter into an agreement for use of their parking facilities. In the event the Moffett Towers management would become willing to enter into an agreement prior to construction of the proposed 129 RQW covered pervious parking along Macon Drive, this alternative would be re-evaluated in context with the availability and use of the Moffett Towers parking facility and mission requirements. Should this occur, a separate FONSI, based on the analysis provided, would be executed for alternatives other than Alternative #1.

Alternative #3 is not inconsistent with the goals of other federal agencies. It is consistent with approved state and local plans. Alternative #3 consolidates and reconfigures facilities and operations within the existing footprint without substantially increasing the level of operations as described in the 2002 NASA Ames Development Plan Programmatic EIS and ROD.

Alternative #3 consolidates the main cantonment area into one contiguous parcel and provides an area for the construction of the new Munitions Storage Complex. However, parking requirements would be unsatisfied unless Moffett Towers management would be willing to enter into an agreement for use. Therefore, Alternative #3 would not be the preferred alternative.

ALTERNATIVE #4: Under Alternative #4, all construction and demolition projects described in Alternative #2 would be implemented, with the exception of the pervious parking area proposed for the east side of Macon Road (part of Project #13) and the photovoltaic generation system that is associated with it (Project #14). The 129 RQW would instead use the existing parking garages located in the Moffett Towers development east of Mary Street for additional parking to support UTA on the weekends. To facilitate parking off-installation at the Moffett Towers development, a new entrance gate would be installed near the intersection of Mary Street and 11th Avenue. A roadway extension connecting 11th Avenue to Macon Road would also be developed and would be approximately 68 feet wide and 140 feet long (approximately 9,520 SF of additional impervious surface). Sidewalks, curbs, and gutters would also be included in this roadway extension.

The 129 RQW has been actively engaged in discussions with the owners of Moffett Towers to determine the feasibility of this alternative. However, following development and analysis of this alternative by the 129 RQW, Moffett Tower's management signaled they would not enter into an agreement for use of their parking facilities. In the event the Moffett Towers management would become willing to enter into an agreement prior to construction of the proposed 129 RQW covered pervious parking along Macon Drive, this alternative would be re-evaluated in context with the availability and use of the Moffett Towers parking facility and mission requirements. Should this occur, a separate FONSI, based on the analysis provided, would be executed for alternatives other than Alternative #1.

Alternative #4 is not inconsistent with the goals of other federal agencies. It is consistent with approved state and local plans. Alternative #4 consolidates and reconfigures facilities and operations within the existing footprint without substantially increasing the level of operations as described in the 2002 NASA Ames Development Plan Programmatic EIS and ROD.

Alternative #4 consolidates the main cantonment area into two parcels and provides an area for the construction of the new Munitions Storage Complex. However, parking requirements would be unsatisfied unless Moffett Toves management would be willing to enter into an agreement for use. Therefore, Alternative #4 would not be the preferred alternative.

NO ACTION ALTERNATIVE: Under the No Action Alternative, AT/FP requirements would not be met once NASA opens the NASA Research Park and the eastern portion of Moffett Field to the public, leaving the installation vulnerable to close attack by potential terrorist activity, and resulting in potential threats to mission-critical resources and potentially impairing the 129 RQW's ability to conduct their mission successfully. Deficiencies could impair the 129 RQW's ability to successfully conduct their mission and to maintain wartime readiness and training.

The No Action Alternative is not consistent with federal goals in that it does not meet AT/FP standards as identified in Unified Facilities Criteria (UFC) 4-022-01, *Security Engineering: Entry Control Facilities/Access Control Points* (2005) and UFC 4-010-01, *DoD Minimum Antiterrorism Standards for Buildings* (2007). The No Action Alternative is consistent with approved state and local plans.

SUMMARY OF FINDINGS

Potential impacts associated with the Proposed Action, in particular, the Preferred Alternative (Alternative #1), have been assessed with regard to the following environmental resource areas:

Earth Resources. Impacts to earth resources from construction, demolition, operations, and maintenance activities are expected to be minor under the Proposed Action. Approximately 9.5 acres of increased impervious surface will result from implementation of Alternative #1. It is expected that implementation of construction Best Management Practices (BMPs) would limit or eliminate soil movement, stabilize runoff, and control sedimentation during surface disturbing activities. These BMPs may include the use of: well-maintained silt fences; minimizing surficial area disturbed; stabilization of cut/fill slopes; minimization of earth-moving activities during wet weather; and use of temporary detention/retention ponds. Following construction, disturbed areas not covered with impervious surfaces will be reestablished with appropriate vegetation and managed to minimize future erosion potential. Given the employment of engineering practices that will minimize potential erosion, impacts to earth resources as a result of the Proposed Action are expected to be minor.

In addition to the increased impervious surface that will result from implementation of the Proposed Action, additional surface area could be disturbed at Moffett Field and in the vicinity over the next several years as a result of the additional projects planned for Moffett Field and the surrounding area. However, given the employment of engineering practices that will minimize potential erosion, cumulative impacts to earth resources are expected to be minor.

Water Resources. Impacts to water resources from construction, demolition, operations, and maintenance activities are expected to be minor under the Proposed Action. Approximately 9.5 acres of increased impervious surface will result from implementation of Alternative #1. Construction activities will adhere to National Pollutant Discharge Elimination System (NPDES) requirements including implementation of BMPs. As such, impacts to water resources under the Proposed Action are expected to be minor.

In addition to the increased impervious surface that will result from implementation of the Proposed Action, additional land surface could be disturbed and converted to impervious surface over the next several years as a result of the additional projects planned for Moffett Field and the surrounding area. It is expected that any construction activities will adhere to NPDES requirements including implementation of BMPs. As such, cumulative impacts to water resources are expected to be minor.

Biological Resources. Impacts to biological resources from construction, demolition, operations, and maintenance activities are expected to be minor. In general, construction activities at Moffett Field will primarily occur on sites that are already highly altered by man. These impacts will include the removal of some vegetation and associated wildlife habitat. However, wildlife that uses these areas is generally typical of urban and suburban areas. In addition, following construction, the disturbed areas will be reestablished with native plants to the extent possible. Operations and maintenance of the new facilities is expected to have minor effects on biological resources, as they will be similar to existing operations and maintenance activities. There are no known active Burrowing Owl nests within the footprint of proposed projects under Alternative #1; and measures described in the 2002 NASA Ames Development Plan Final Programmatic EIS and Burrowing Owl Habitat Management Plan will be followed during construction of the proposed projects. Therefore, impacts to owls are not expected. Impacts to threatened, endangered, rare, sensitive, and other protected species as a result of the Proposed Action will be minor.

In addition to the implementation of the Proposed Action, additional land surface could be disturbed as a result of the additional projects planned for Moffett Field and the surrounding area. However, it is expected that cumulative impacts to biological resources are expected to be minor.

Air Quality. Impacts to air quality from construction, demolition, operations, and maintenance activities are expected to be minor. In general, combustive and fugitive dust emissions from construction and demolition activities associated with the Proposed Action will contribute localized, short-term elevated air pollutant concentrations, but will not result in any long-term impacts on the air quality of the San Francisco Bay Area Air Basin, nor have any significant adverse impacts on the California State Implementation Plan (SIP). It is expected that impacts to air quality to the Air Basin from the emission increases from proposed activities will be minor.

The proposed activities described in the Environmental Assessment (EA), combined with additional projects planned for Moffett Field and the surrounding area, will contribute localized, short-term, elevated air pollutant concentrations, but will not result in any long-term impacts to the air quality of San Francisco Bay Area Air Basin, nor have any significant adverse impacts on the California SIP.

Land Use/Visual Resources. Impacts to land use and visual resources from construction, demolition, operations, and maintenance activities are expected to be minor. In general, land uses at Moffett Field will not be adversely affected by implementation of the Proposed Action. The location and function of the proposed structures are generally compatible with the surrounding area and will work to consolidate like functions, consolidate CAANG activities into fewer locations, and improve overall utility. Described activities will not adversely affect the viewshed at or near Moffett Field. While the proposed construction activities include some relatively large structures, the size and type of buildings will be similar to other buildings at Moffett Field, as described in the NASA Ames Development Plan Programmatic EIS (2002) and the City of Sunnyvale's Moffett Park Environmental Impact Review. As the proposed structures will not be incongruent with the surrounding buildings or land uses, impacts to land use and visual resources will be minor as a result of the Proposed Action. In addition, as the proposed structures will not be incongruent with the surrounding buildings or land uses, cumulative impacts to land use and visual resources is expected to be negligible.

Socioeconomics and Environmental Justice. Impacts to socioeconomics and environmental justice from construction, demolition, operations, and maintenance activities are expected to be minor. Expenditures from the activities at the 129 RQW installation as a result of the Proposed Action will generally result in minor beneficial economic impacts to the region by generating ongoing construction-related employment and income in the region of influence (ROI). Impacts will be temporary in nature; however, only accruing economic benefits to the region for the duration of construction activities. No permanent or long-lasting socioeconomic impacts are anticipated as a result of implementation of these activities. Disadvantaged groups within the ROI, including minority and low-income populations, do not represent a disproportionately high segment of the ROI population. Additionally, because no significant direct, indirect, or cumulative adverse impacts are anticipated, impacts to these populations will be minor. There are no known environmental health or safety risks associated with these activities that could disproportionately affect children.

No permanent or long-lasting cumulative socioeconomic impacts are anticipated as a result of implementation of these activities. Because no significant adverse impacts are anticipated, there will be no adverse cumulative impact to minority or low-income populations. There are no known cumulative environmental health or safety risks associated with these activities that may disproportionately affect children.

Cultural Resources. In the event of unanticipated discoveries of cultural resources during construction, demolition, operations, and maintenance, work will halt at that location and the resources will be managed in compliance with federal law and Department of Defense (DoD) regulations. Direct, indirect, or cumulative effects on historic facilities, including the Shenandoah Plaza Historic District that also includes Hangars 2 and 3, or on archaeological resources from the Proposed Action are expected to be minor. Resources will be identified and impacts will be avoided or mitigated following the NASA Ames Development Plan

Programmatic Agreement (2002) for redevelopment of the former Naval Air Station (NAS) Moffett Field. In addition, cumulative impacts to cultural resources are not expected as a result of all planned activities at Moffett Field. Compliance with Section 106 of the National Historic Preservation Act (NHPA), including State Historic Preservation Office (SHPO) and Native American consultation to identify any known archaeological resources will be accomplished prior to implementation of any of the actions described under the Proposed Action.

Solid and Hazardous Materials and Waste. Impacts to solid and hazardous materials and waste from construction, demolition, operations, and maintenance activities are expected to be minor. Where feasible, the 129 RQW will divert non-hazardous solid waste from landfills and incinerators through reuse, recycling, or donating, as appropriate. Products containing hazardous materials and petroleum products will be procured and used during the construction, demolition, operations, and maintenance activities associated with the Proposed Action. It is anticipated that the quantity of products containing hazardous materials used during the construction of these facilities will be minimal and their use will be of limited duration. Contractors will be responsible for the management of hazardous materials, which will be handled in accordance with federal, state, and local laws and regulations. Direct, indirect, and cumulative impacts as a result of the Proposed Action are expected to be minor.

Safety. Risk of catastrophic events occurring during construction, demolition, operations, and maintenance activities described under the Proposed Action is considered to be low, and strict adherence to all applicable occupational safety requirements will further minimize the relatively low risk associated with described construction activities. Additionally, facilities will be sited in relation to the proposed Munitions Storage Complex (MSC) in accordance with United States Air Force (USAF) Manual 91-201. Direct, indirect, and cumulative impacts to safety are expected to be minor.

Infrastructure. Impacts to infrastructure from construction, demolition, operations, and maintenance activities are expected to be minor. Construction activities will likely result in some temporary interruption of utility services during construction activities; however, these impacts will be minor and temporary. Energy consumption is expected to remain consistent or possibly decrease slightly compared to energy consumption associated with the current facilities due to incorporation of Leadership in Energy and Environmental Design (LEED) and sustainable development concepts in the new construction. Under the Proposed Action, construction and demolition activities associated with repairs to roadways, as well as parking and driveways, will likely result in moderate short-term adverse impacts to transportation and parking on the 129 RQW installation; however, because of improvements to the installation's transportation and parking system, the resulting long-term impact will be positive. New facilities and circulation systems under the Proposed Action will further enhance the existing installation transportation networks. In general, direct, indirect, and cumulative impacts to installation infrastructure as a result of the Proposed Action are expected to be positive over the long-term.

PUBLIC INVOLVEMENT: The National Environmental Policy Act (NEPA), 40 Code of Federal Regulations (CFR) 1500-1508, and 32 CFR 989 require public review of the Environmental Assessment (EA) before approval of the Finding of No Significant Impact (FONSI) and implementation of the Proposed Action. A notice of availability for public review was published in the San Jose Mercury News on August 10, 2009. Comments received from agencies and the public have been addressed and incorporated, as appropriate, into the Final EA.

FINDING OF NO SIGNIFICANT IMPACT (FONSI): Based on my review of the facts and analysis in this EA, I conclude that Alternative #1 will not have a significant impact on the quality of the human or natural environment or generate significant controversy either by itself or considering cumulative impacts. Accordingly, the requirements of NEPA, the Council on Environmental Quality (CEQ), and 32 Code of Federal Regulations (CFR) 989, *et seq.* have been fulfilled, and an EIS is not necessary and will not be prepared. This proposed federal action is between two federal agencies and will occur on federal property only. As such, the federal action is exempt from the California Environmental Quality Act (CEQA). Therefore, CEQA analysis is not required or addressed in the EA or this FONSI.



DAVID A. BECK, Colonel, USAF
Executive Secretary
Environmental, Safety, and Occupational Health Council



Date