

Draft Finding of No Significant Impact
Integrated Natural Resource Management Plan
U.S. Army Garrison
Yuma Proving Ground, Arizona

The U.S. Army Garrison (USAG) Yuma Proving Ground (YPG) prepared the attached environmental assessment (EA), hereby incorporated by reference, to identify and evaluate potential environmental impacts associated with implementing the proposed action, which is to carry out YPG's Revised Integrated Natural Resource Management Plan (INRMP) for FY 2022-FY 2026.

YPG has managed Natural Resources under an INRMP since 1997. The INRMP was revised in 2012 and updated in 2017. It is reviewed with regard to operation and effect by YPG, AZGFD and USFWS on a regular basis, but not less often than every 5 years.

The purpose of this INRMP is to guide and document the manner in which YPG sustains the military mission on the installation while managing the ecological health of our natural resources pursuant to the Sikes Act, AR 200-1, and DODI 4715.03. The INRMP ensures that sound land management, environmental stewardship, and compliance with all relevant laws, regulations, and applicable state and federal management plans, are considered during mission and project planning activities and that no net loss of mission capacity results from meeting our stewardship responsibilities.

The revision is needed to better align our mission and conservation goals with our continuing natural resource management actions. Furthermore, the revision would provide better integration of natural resource management to all YPG activities such as fire, safety, law enforcement, and the military mission.

The EA was prepared in accordance with the National Environmental Policy Act of 1969 (NEPA), the Council on Environmental Quality regulations implementing NEPA (Title 40, USC, Parts 1500 through 1508); Department of Defense (DOD) Directive 4715.9 Environmental Planning and Analysis; and Environmental Analysis of Army Actions (CFR Title 32, Part 651).

In preparation of the EA, no alternatives other than those presented in the EA, were determined to satisfy the purpose and need of the Proposed Action. Therefore, only the No Action Alternative and the Proposed Action were carried forward for analysis.

Description of the Proposed Action

The proposed action would implement the INRMP 2022-2026 revision in its entirety as referenced from Appendix 1. The focus of the INRMP is the implementation of goals, objectives, and natural resources management policies and actions. This management plan is based on ecosystem management with the intention of demonstrating the interrelationships between the military mission and natural resources management.

The INRMP includes a five-year implementation plan that lists projects needed in order to meet the priorities or challenges faced by the coordinating agencies. This plan is used as a tool to aid YPG in seeking funding, contracts, and agreements needed to execute projects. YPG, in coordination with AZGFD and FWS, will review this list annually as part of the INRMP review and make changes as necessary. Projects on the list would be implemented as funding is available.

Pursuant to the Sikes Act, this INRMP must be reviewed as to operation and effect on a regular basis, but no less often than every 5 years by YPG, AZGFD and FWS. This review must be documented and signed by

these agencies. The INRMP would receive routine updates to provide clarity or new information. Updates would not undergo further NEPA analysis unless substantive changes in the plan elements are required per the annual review. If the changes to the INRMP would result in any new natural resources management actions necessitated by changes to the military mission, the condition of the land, or the status of the species present and not previously considered, then additional NEPA analysis would be required.

No Action Alternative

Consideration of the No Action Alternative is required under the NEPA process and serves as a benchmark to compare to the Proposed Action and alternatives. Under the No Action Alternative, the Revised INRMP would not be implemented, and management activities under the 2017 INRMP would continue. Failure to revise the 2017 INRMP would violate the Sikes Act and Army Regulation 200-1, and prevent the opportunity to better align the goals and actions of the plan to better meet the needs of YPG and the partner agencies.

Environmental Consequences

After the initial evaluation, Environmental Justice, Farmlands – Prime/Unique, Floodplains, Noise, Socioeconomic Values, Transportation and Infrastructure, Visual Resources, Hydrological or Water Resources were eliminated from further analysis because the potential for impacts to these resources was determined to be nonexistent, unlikely, or negligible. As a result, the scope of environmental analysis focused on the resources listed below that were determined to be potentially affected in connection with the Proposed Action.

The EA evaluated potential impacts on the following resources: Biological Resources, Cultural Resources, Air Resources, Hazardous Materials and Wastes, Health and Safety, Land Use and Recreation, and Soil Resources.

Summary of Impacts

As summarized below, the Proposed Action would result in less than significant impacts to the resources analyzed in the EA.

Biological Resources

Physical impacts from INRMP projects are generally divided into three categories: natural resource surveys, habitat enhancement, and vegetation management. Although some minor, adverse impacts are expected as a result of these projects, they would be less than significant and the long-term benefit to the natural environment would outweigh the temporary adverse impacts.

Natural resources surveys would be conducted by traversing habitat. Capturing animals for collaring or relocation may require trapping or use of aircraft. Impacts may include trampled vegetation or invertebrates, noise disturbances to nesting birds and other wildlife, soil erosion and compaction, and creation of fugitive dust. These impacts, however, would be minor, temporary, and infrequent and would not any present long-term impacts to biological resources.

Habitat enhancement often consists of the construction of water catchments, exclusion fencing, vegetation removal and recontouring the project sites. Impacts may include trampled vegetation or invertebrates, noise disturbances to nesting birds and other wildlife, soil erosion and compaction, and creation of fugitive dust. This type of work would have temporary and minor adverse impacts to the habitat, but once completed would benefit overall habitat quality and biological resources.

Vegetation management would be performed by physical, mechanical, and/or chemical means; all three methods could temporarily impact biological resources. Physical removal would include personnel or contractors traversing weed infested areas to hand pull vegetation, possibly disturbing non-target

vegetation, invertebrates, and other wildlife. Mechanical removal would involve using gas-powered machinery, such as weed whackers and mowers, which would create noise disturbances to wildlife and disturb soils. Chemical treatment would be conducted in accordance with the Installation's Integrated Pest Management Plan and applicable federal, state, and local laws and regulations. In the event of a petroleum or chemical spill, the Installation would enact its Spill Plans to contain and clean up the spilled material. Overall, nonnative and invasive species removal would provide long-term, less than significant beneficial impacts by eradicating pest and invasive species that damage or destroy native species.

Cultural Resources

Physical impacts from INRMP projects are generally divided into three categories: natural resource surveys, habitat enhancement, and vegetation management. The impacts could occur from ground disturbing activity such as:

- Construction and maintenance of wildlife water catchments.
- Walking to overland
- Staging vehicles and equipment or aircraft
- Vegetation removal, mechanical and chemical.

These types of activities could damage or displace cultural artifacts. Ground disturbing activities can also create trails that inadvertently attract unauthorized persons to enter an area. All undertakings would be subject to the National Historic Preservation Act section 106 consultation requirements including consultation with the Arizona State Historic Preservation Office and consultation with the Tribes.

There is always the potential for inadvertent discovery of previously unidentified archaeological deposits not discovered during the initial inventory process. Best management measures included in the EA specify actions that would be taken to avoid and minimize impacts, as well as actions taken in the event that archaeological materials are discovered during construction or excavation activities.

The INRMP would have no significant effect on cultural resources because all activities would be evaluated and appropriate avoidance, minimization and mitigation measures applied to the activity. The INRMP includes provisions for Conservation Law Enforcement which would be beneficial to the protection of cultural resources.

Air Resources

Negligible impacts to air quality are expected from implementation of natural resource management activities. Some activities would result emissions such as fugitive dust and vehicle and equipment exhaust. Equipment usages associated with INRMP projects are limited to small habitat improvement or monitoring projects with limited footprint and duration. Proposed emissions would be notably below the *de minimis* thresholds for Yuma and La Paz counties. Pesticide application would result in negligible, temporary impacts to air quality. Overall, impacts would be negligible and would not contribute significant emissions to local or regional air quality.

Integration of natural resource management principals with YPG testing/training, construction and operations would have a benefit to air resources as best management practices are encouraged to be incorporated into project planning to reduce impacts of all YPG actions.

Hazardous Materials and Wastes

The use of pesticides/herbicides in and around YPG could adversely affect plants and insects in the treatment areas however those impacts would not degrade overall habitat or make areas un-inhabitable

by wildlife and native flora. Herbicides would be used only in limited quantities to control invasive species or other unwanted vegetation and pesticides and would be used in accordance with the YPG Integrated Pest Management Plan and the Army's pesticide reduction goals.

Vehicles and/or other equipment used during surveys, mapping, construction of wildlife waters, or other activities may potentially release (or spill) fuels, hydraulic fluids, and lubricants. However, spills or releases would be small and localized. Best Management Practices (BMPs) would be implemented to minimize the potential for accidents to occur. Accidental spills would result in a less than significant impact to public health and the environment; therefore, the proposed action would not result in significant impacts.

Health and Safety

Health and safety impacts are expected to be beneficial and less than significant due to the avoidance measures and best management practices. Law enforcement patrols would increase the safety of the public by limiting access to unexploded ordnance, live-fire testing/training, etc. Wildlife aircraft strike hazard management, wildland fire management, and nuisance animal control would contribute to safety benefits. All personnel associated with the implementation of the Proposed Action would be required to comply with applicable health and safety regulations. In areas where UXO may be encountered, site-specific determinations will be made by the YPG ESD to determine requirements or mitigation measures necessary to avoid or minimize to the potential for adverse effects on the health and safety of YPG personnel or the public.

As described in the INRMP, YPG uses a comprehensive approach to avoiding unwanted wildfires and managing them when they occur to reduce associated costs and damages. YPG's approach, reviewed on an annual basis, allows better monitoring and control of wildland fire on YPG and provides a beneficial effect to the fire management program.

Land Use and Recreation

The revised INRMP would not adversely affect land use or access to the installation for recreation as it does not reduce or eliminate any current uses. It would be beneficial for land use and recreation as the plan provides additional support and guidelines to aid Conservation Law Enforcement and interdepartmental coordination to support recreational demand. Beneficial impacts would be less than significant.

Soil Resources

Less than significant beneficial impacts to soils are expected from implementation of the INRMP. Integration of natural resource management to YPG actions ensure that appropriate best management practices are implemented for all military testing/training and construction action. Soil-disturbing activities from operations related to habitat restoration projects have potential for erosion from wind or storm events in the project areas but are limited to very small project areas. Restoration of native vegetation, and erosion controls such as slope protection and mulching would have beneficial impacts. Vehicles and equipment used in restoration, survey, or monitoring activities may release pollutants that could contaminate soils, such as oils or other fluids. The EA lists BMPs that would be implemented to avoid or minimize potential impacts, which are expected to result in less than significant effects to soil resources.

Public Participation

Preparation and implementation of the INRMP is a collaborative process between YPG, AZGFD, and USFWS. AZGFD, USFWS, resource managers in our region including Bureau of Land Management, Bureau of Reclamation, 56 RMO at Luke Air Force Base and Marine Corps Air Station Yuma all have provided the installation with natural resource technical expertise and guidance. The Draft INRMP and EA/Draft FONSI

were made available for public review and comment on **September 15, 2022**. Information about the plan was also made available on YPG's public website at <https://ypg-environmental.com/nepa>. A public notice announcing the availability of the Draft INRMP, EA and Draft Finding of No Significant Impact (FONSI) were published in the Yuma Sun and the Desert Messenger in Quartzsite. **XXX comments** were received during the review period and concerns identified were addressed as applicable.

Conclusion

Based on the analysis presented in the EA for the Integrated Natural Resource Management Plan on USAG YPG, the direct, indirect, and cumulative impacts were considered and it is determined that no significant environmental impacts are anticipated as a result of implementing the Proposed Action. Therefore, preparation of an Environmental Impact Statement is not required and a FONSI is the appropriate decision document to conclude the NEPA process. I have read and concur with the findings and analyses documented in the EA and hereby approve the FONSI.

Ronny J. James
Garrison Manager

Date

Ben P. McFall, III
COL, IN
Commanding

Date