DEPARTMENT OF DEFENSE
Department of the Navy

FINDING OF NO SIGNIFICANT IMPACT FOR THE ENVIRONMENTAL ASSESSMENT FOR TRAINING AND TESTING NAVAL BASE POINT LOMA, CALIFORNIA

Pursuant to the United States (U.S.) Council on Environmental Quality regulations (40 Code of Federal Regulations [CFR] Parts 1500-1508) implementing the National Environmental Policy Act (NEPA) and Department of the Navy (DON) NEPA regulations (32 CFR Part 775), DON gives notice that an Environmental Assessment (EA) has been prepared. Based on this Finding of No Significant Impact, an Environmental Impact Statement is not required for Military Training and Testing Project at Naval Base Point Loma (NBPL), San Diego County, California, as described in Alternative 2 of the EA.

Proposed Action: Commander, United States Pacific Fleet, a Command of the Navy, proposes to conduct military readiness training activities (hereinafter referred to as "training") and conduct research, development, testing, and evaluation activities (hereinafter referred to as "testing") at NBPL in San Diego, California. Proposed activities would take place on the terrestrial portions of NBPL and within areas for the scheduled use of Unmanned Aircraft Systems (UAS), existing facilities, and Over-the-Beach (OTB) training areas of NBPL. The Proposed Action is comprised of the continuation of ongoing training and testing, and new capabilities including proposed training and testing and range improvements, which include the following:

- conduct additional small UAS activities, including counter-UAS
- increase the number of Unmanned Systems (UxS) testing activities and expand the UxS Southern Testing Area
- conduct additional OTB training activities and increase the number of locations where OTB activities could occur
- conduct timed-fuse calculation training
- increase Improvised Explosive Device training
- conduct force protection activities
- conduct insertion and extraction training
- designate up to two unimproved helicopter landing zones (or HLZs) to support insertion/extraction activities of rotary-wing aircraft (does not include tilt-rotor aircraft)

Purpose of and Need for the Proposed Action: The purpose of the Proposed Action is to provide a training area at NBPL with the capability to support increased levels of training by Explosive Ordnance Disposal (EOD) and Naval Special Warfare units and increased levels of testing by Naval Information Warfare Center (NIWC) Pacific.

The Proposed Action is needed for the Navy to meet statutory responsibilities to train and maintain combat-ready forces and to equip forces with the most advanced technologies. Dedicated training areas that provide these capabilities while integrating with multiple commands would allow required training and further the Navy's execution of its congressionally mandated responsibilities under 10 U.S. Code section 8062. The Proposed Action would also promote additional integration with NIWC Pacific's development and testing activities, which would assist in developing testing scenarios and identifying gaps in technology. The Proposed Action would also enable the broader use of existing areas for the development and testing of NIWC Pacific's unmanned terrestrial and aerial systems, which would allow for more rapid introduction and use of these systems by the Fleet.

Public Outreach: Outreach and public involvement efforts were conducted per NEPA and Navy guidance. The Draft EA was released for a 15-day public review on August 2, 2022. The Navy informed the public of the Proposed Action and the potential environmental impacts through a Notice of Availability published in the San Diego Union Tribune (August 2, 6, and 7), the San Diego Union Tribune en Español (August 6), and the Peninsula Beacon (August 12). The notices announced the availability of the Draft EA, listed the locations where public review copies are available, and provided information on how to submit comments on the EA. Project information and documents were made available on the Navy Region Southwest website (https://cnic.navy.mil/navysouthwestprojects) and at the following information repositories, Point Loma/Hervey, Ocean Beach, and San Diego Central libraries. All comments received were considered fully by the Navy, and the Final EA has been updated accordingly.

In response to comments submitted during the initial review period, the Navy extended the public comment period 15 additional days, closing the public comment period on August 31, 2022. Additionally, in response to requests in public comments, the Navy provided two public presentations regarding the Proposed Action, one to the Point Loma Association and one to the Point Loma Rotary Club. Other comments submitted by the public included concerns regarding noise from training activities. Information from new noise studies performed in 2023 has been included in this EA and analysis.

Alternatives Analyzed: The EA analyzed the potential environmental impacts of the following alternatives:

No Action Alternative: Under the No Action Alternative, the Navy would continue existing testing and training at existing levels. The Navy would continue to conduct UxS (ground, amphibious, and air) activities within the UxS Development and UxS Integration and Experimentation Areas at NBPL. Naval Special Warfare units would continue to train in special reconnaissance scenarios, personnel recovery, OTB training, technical tactical operations, and target raids. Training locations at NBPL include the Robot Training Lane, Battery Woodward, cable/power line trail and outlook, and Infiltration and Extraction OTB Area. Land navigation would be conducted concurrently with OTB activities and would include personnel on foot using land navigation techniques, such as compass and global positioning system tools, to navigate from beach landing sites to specified objectives (e.g., Battery Woodward, Battery Whistler, Robot Training Lane, Rural Training Search Village). The Navy would continue to conduct Explosive Energetic Tool (EET) training at NBPL (EETs are small explosive charges encased in a plastic bottle full of water). Training locations currently include the Robot Training Lane, Battery Woodward, Battery Whistler, and the Rural Search Training Village. The Navy would also continue to conduct EOD combat skills training, mock Chemical/Biological Warfare Agent/Homemade Explosive Hazards training, and mock Nuclear Hazard training at the Robot Training Lane, Battery Woodward, Battery Whistler, and the Rural Search Training Village.

Alternative 1: Under Alternative 1, the Navy would conduct additional UAS and UxS testing activities and expand the UxS Southern Testing Area to support off-road testing. The expanded UxS Southern Testing Area is located on an existing but abandoned unpaved road/trail and would require vegetation clearing and continual mowing for maintenance (both conducted outside of the California gnatcatcher breeding season) before use. Additionally, the Navy would conduct additional OTB training activities, increase the number of locations where OTB activities could occur, increase the number of Improvised Explosive Device training activities, and conduct insertion and extraction training activities.

Alternative 2: The Navy would conduct all testing and training activities listed under Alternative 1 and designate up to two unimproved HLZs on existing paved or unpaved roadways to support insertion and extraction activities using rotary-wing aircraft (does not include tilt-rotor aircraft) for Naval Special Warfare and EOD unit-level training. Proposed training would also include insertion and extraction of a small team of personnel and equipment from these HLZs. Approximately 10 percent of the insertion or

extraction training activities identified under Alternative 1 would include the use of rotary-wing aircraft under Alternative 2 (approximately three events per year). Insertion/extraction flights would approach the HLZs from directly west of the HLZs, typically flying at an elevation of 1,000 feet (ft.) above ground level or less and depart in the opposite direction, only momentarily sitting stationary on the HLZ for loading or unloading. Helicopters used in these exercises could originate from numerous locations (airfields or offshore platforms) but would always approach these HLZs from the west and coordinate with other commands to ensure safety.

Alternative to be Implemented: Alternative 2 is the preferred Alternative for implementation as it best meets the purpose of and need for the Proposed Action and would not result in significant impacts to the human and natural environment.

Environmental Effects:

Impacts to potentially affected resources were analyzed in detail in the EA, including direct, indirect, and cumulative impacts. Cumulative impacts were assessed as part of the EA's existing conditions, and in the direct and indirect impact analysis. No significant direct, indirect, or cumulative environmental impacts would occur from implementing the Proposed Action. A summary of the analysis is provided below.

Biological Resources:

Permanent vegetation removal under Alternative 2 would occur to 0.32 acre (ac.) of vegetation from establishment and long-term maintenance of the proposed UxS Southern Test Area. Additional impacts on vegetation in limited areas along existing trails where Navy personnel meander off trails may occur. This may include soil compaction and disturbance around root bases, minor branch breaking from foot traffic during off trail and OTB activities, and the potential for an increase in nonnative invasive plant species. Activities that occur off trail are not proposed in any areas that are known to contain Orcutt's spineflower or that are considered high-quality habitat for the species. Furthermore, measures proposed to minimize impacts on Orcutt's spineflower would be implemented if training and testing activities are proposed in close proximity to known Orcutt's spineflower locations. Annual monitoring would continue to assess known and high-quality habitat areas, and training maps would be updated as needed based on results of annual monitoring.

Noise and human/vehicle disturbance may impact non-federally listed special-status species (reptiles, small mammals, birds, and bats) and the federally listed coastal California gnatcatcher and Migratory Bird Treaty Act (MBTA)-protected avian species. UAS takeoff and landing, UxS, the firing of blanks, Ultimate Training Munitions (marking rounds), simunitions, and EET detonations have the potential to generate noise that may disturb special-status species, including coastal California gnatcatchers and other MBTA- protected birds. The physical presence of humans, UAS, UxS, vehicles, and other equipment proximate to occupied habitat from activities such as OTB; land navigation; foot patrolling; blank firing; and inert, or "mock," Chemical, Biological, Radiological, and Nuclear training, may result in injury/mortality or disturbance to nesting coastal California gnatcatchers and MBTA-protected birds. The use of the two HLZs by rotor-wing aircraft would generate noise, vibration, and rotorwash that may disturb coastal California gnatcatchers and MBTA-protected birds. Use of the HLZs will be restricted to outside of the avian breeding season (September 1 through February 14). Based on the proposed training and testing activities, Alternative 2 may impact seven pairs of coastal California gnatcatchers annually through minor habitat loss, potential for injury/mortality (from vehicle and aircraft collision while transiting through occupied habitat), nonnative invasive plant species and erosion, and disturbance.

Measures proposed to reduce impacts on the coastal California gnatcatcher would be implemented, such as conducting early and mid-season coastal California gnatcatcher surveys (prior to training and testing activities to identify and avoid occupied and nesting areas), conducting training activities outside of the coastal California gnatcatcher breeding season at certain training locations and for certain activities, flying UAS at heights that are unlikely to cause noise disturbance, and other measures including the restoration of 0.96 ac. of suitable coastal California gnatcatcher habitat.

General and species-specific avoidance and minimization measures (herein referred to as Conservation Measure [CM]-1 through CM-22) to be implemented as part of Alternative 2 are detailed below.

CM-1. A NBPL installation biologist, Naval Facilities Engineering Command biologist, or contractor biologist (depending upon the specific need) (collectively hereafter referred to as biologist) will ensure compliance with the CMs, including any required surveys and monitoring activities. The biologist will (a) have knowledge of and experience with the federally listed species and associated habitats that require surveying or monitoring activities; (b) have a bachelor's degree with an emphasis in ecology, wildlife science, or related science; and (c) have the experience and training necessary to conduct tasks described in the CMs.

CM-2. The biologist will provide environmental awareness instruction to all personnel that are scheduled to train at NBPL prior to authorization for training at NBPL. In addition, the biologist will provide annual training for commands that routinely train at NBPL. Training will include material outlining: (a) the natural resources found at NBPL, including listed species; (b) the location of the Point Loma Ecological Conservation Area (PLECA); and (c) the protective CMs required to be followed while training on NBPL. Specifically, instruction will include a description of listed species and habitats occurring on NBPL; details on each species' habitat requirements; the CMs to be implemented for each species; the role of the NBPL Natural Resources Department and qualified biologists; the responsibilities of those operating within NBPL to protect biological resources; the importance of complying with CMs; and the method for reporting problems and the steps to take for problem resolution. Navy personnel will also be instructed to report any observation of injured or dead birds or dislodged bird nests to the biologist.

CM-3. Trash or food waste from training and testing will be contained within covered, secured trash bins that are inaccessible to wildlife, and will be removed from NBPL on a regular basis to prevent attraction of predators (e.g., American crow [*Corvus brachyrhynchos*] or common raven [*Corvus corax*] and mammalian scavengers, such as rats [*Rattus* sp.], raccoons [*Procyon lotor*], and skunks [*Mephitis mephitis*]).

CM-4. Prior to each training event in vegetation areas at NBPL (including those conducted on unpaved roads and trails) personnel will visually inspect boots, clothing, and equipment and remove soil, mud, plant debris, and seeds.

CM-5. The Navy will conduct annual surveys and necessary treatment to detect and remove nonnative plant species from NBPL consistent with the *Vegetation Management Plan for Naval Base Point Loma*. The Navy will prioritize the following areas for annual survey and treatment: trails and areas immediately adjacent to roads where training occurs on foot, the UxS Southern Test Area, HLZs, and the Cable/Power Line Trail and Outlook.

CM-6. Training and testing activities will be conducted in compliance with the Naval Base Point Loma and Cabrillo National Monument Joint Wildland Fire Management Plan.

CM-7. The Navy will install markers along roadway segments within the PLECA, including the Southern UxS Test Area roadway, to alert vehicles and pedestrians of the presence of sensitive habitats and remind drivers, pedestrians, and remote vehicle operators to remain on the road.

CM-8. The Navy will conduct annual protocol coastal California gnatcatcher surveys within 300 ft. of areas that will be used for training during the breeding season. Five surveys will be conducted during the first two months of each nesting season (February 15–April 15). During the survey window no training/testing (e.g., Special Operations Command, UxS) will traverse coastal California gnatcatcher habitat. One survey will be conducted mid-season (i.e., between May 15 and June 15) to confirm the locations of coastal California gnatcatchers/nests and facilitate nest avoidance. The biologist conducting the surveys will also search for signs of dislodged coastal California gnatcatcher nests and/or coastal California gnatcatchers that have been killed or injured on the roadside or during previous training activities. The NBPL Natural Resources Department will notify the U.S. Fish and Wildlife Service (USFWS) of survey results within two weeks of the protocol and mid-season surveys and present a power point of survey results at the end of each nesting season (i.e., by November 15 each year). This could be presented as part of the annual metrics meeting.

CM-9. The Navy will schedule training/testing activities that traverse coastal California gnatcatcher habitat between September 1 through February 14 (i.e., outside of the breeding season) to the extent consistent with training requirements. If training/testing that traverse coastal California gnatcatcher habitat must occur between February 15 through August 31 to meet training requirements, the Navy will implement the following CMs (however, see CM-10 for activities that will always be conducted between September 1 through February 14):

a. Nests or shrubs/areas frequently used by coastal California gnatcatchers within 25 ft. of the proposed training areas (based on pre-season protocol surveys and mid-breeding season survey) will be marked for avoidance and incorporated into the training event as an avoidance area. Temporary markings will be removed once training is complete.
b. Prior to each training event, instructors will place illuminated markers (visible only with infrared glasses) along the trail/road to facilitate adherence to the path of travel. Illuminated markers will be removed once training is complete.
c. Personnel will remain on the existing/previously established trails/roads with the exception of concealment (hiding in bushes) only within 10 ft. from the existing/previously established trail/road. Training will include guidelines that render areas beyond approximately 10 ft. from established trails/roads as out of bounds.

CM-10. The following activities will occur only between September 1 through February 14 to avoid the coastal California gnatcatcher breeding season:

a. Outdoor training using EET training devices at Robot Training Lane, Battery Woodward, and Rural Search Training Village (these devices may, however, be used year-round at Battery Whistler due to the lack of adjacent coastal California gnatcatcher habitat).
b. Firing of simunitions and Ultimate Training Munitions, which will occur only in developed training areas.

CM-11. Vehicles, UxS, and all other wheeled equipment will remain on, and UAS will be launched from, designated roads or staging areas.

CM-12. Vehicles, UxS, and all other wheeled equipment will adhere to a maximum speed limit of 25 miles per hour on roads that bisect coastal California gnatcatcher habitat (e.g., Gatchell Road).

CM-13. The minimal amount of vegetation necessary to maintain a 10-foot-wide UxS Southern Test Area two-track road (0.32 ac.) will be cleared/trimmed at the road edges initially and during long-term maintenance between September 1 through February 14, outside of the coastal California gnatcatcher breeding season. A qualified biologist will be present during the initial and long-term maintenance vegetation clearing/trimming to observe any coastal California gnatcatchers within the area to be cleared/trimmed, and flush them from harm's way. The limits of impact will be marked prior to initial clearing/trimming and long-term maintenance. The Navy will submit a post-clearing/trimming report confirming that the flagged limits were not exceeded and no more than 0.32 ac. of coastal sage scrub was impacted.

CM-14. The Navy will implement erosion control to address accelerated erosion associated with intensified use of the UxS Southern Test Area.

CM-15. Prior to vegetation removal along the edges of the UxS Southern Test Area two-track road, the Navy will submit to the USFWS for review and approval, a plan to restore 0.96 ac. of coastal sage scrub habitat on NBPL. The plan will include the following: (a) map, photos, and description of the restoration site(s); (b) restoration methods (weed removal, seed mix and/or plant palette, site preparation methods, seeding/planting methods); (c) maintenance methods; (d) success criteria; (e) monitoring schedule; and (f) implementation schedule.

CM-16. Group 1, Group 2, and Group 3 Heavy UAS will remain more than 50 ft. above ground level over coastal California gnatcatcher habitat year-round, unless specifically required for survey purpose or to meet a specific mission. In addition, all UAS groups will ensure that the 60 dBA threshold for coastal California gnatcatcher disturbance is not exceeded at ground level during the breeding season by adhering to the following minimum altitudes: DJI Mavic (131 ft.); DJI Phantom 4 Pro 2.0 (220 ft.); Draganflyer (50 ft.); Hexacopter APH-22 (50 ft.); Raven sUAS (131 ft.); Raven Aerostar TIF-2675 (50 ft.); RQ-27 Scan Eagle (525 ft.).

CM-17. A qualified biologist will conduct annual surveys for Orcutt's spineflower in mapped habitats (e.g., Figure 3-2 of the EA, and additional habitat if mapped in the future) and within 100 ft. of proposed HLZ 2, which is characterized by potentially suitable soil conditions downslope from a known occurrence.

CM-18. Known occurrences and Orcutt's spineflower habitat, including expanded or new areas of Orcutt's spineflower habitat, that are identified within 50 ft. of HLZ 2, roadways or trails approved for training, will be clearly identified on training maps and in the field and avoided during training and testing.

CM-19. Within Orcutt's spineflower habitat, personnel will remain on the existing/previously established trails/roads with the exception of concealment (hiding in bushes) only within 10 ft. from the existing/previously established trail/road. Training will include guidelines that render areas beyond approximately 10 ft. from established trails/roads as out of bounds.

CM-20. If it is determined that Orcutt's spineflower habitat has been impacted (e.g., by vehicle or pedestrian activity, fire, etc.) the incident will be reported immediately to the NBPL Natural Resources Department and necessary follow-up steps will be implemented. The NBPL Natural Resources Department will notify the USFWS of the incident and potential impacts within 24 hours.

CM-21. CMs 1, 2, 4, 5, 6, 7, and 11 included previously to avoid and minimize Proposed Action impacts to the coastal California gnatcatcher will also help avoid and minimize Proposed Action impacts to Orcutt's spineflower.

CM-22. Initial and long-term maintenance vegetation trimming along the existing two-track dirt road edges at the proposed UxS Southern Test Area will be conducted outside of the avian breeding season (vegetation trimming will be authorized during the nonbreeding season from September 1 through February 14). The minimal amount of vegetation will be trimmed to maintain a 10-foot wide area for UxS to safely operate. Birds protected by the MBTA will also benefit from measures CM-9 through CM-16.

CM-23. Public notification will occur prior to exercises utilizing blanks. Notification is to make public aware and minimize noise complaints.

CM-24. The proposed HLZs will not be used during the avian breeding season (February 14–August 31). HLZ usage will be authorized during the nonbreeding season from September 1 through February 14.

The Navy has completed consultation with the USFWS regarding this Proposed Action and impacts on Orcutt's spineflower (*Chorizanthe orcuttiana*; endangered) and coastal California gnatcatcher (*Polioptila californica californica*; threatened). A biological opinion was issued for the Proposed Action on May 25, 2023, that concurs with a not likely to adversely affect determination for Orcutt's spineflower and provides incidental take coverage for the coastal California gnatcatcher due to the potential to adversely affect the species. The biological opinion is provided in Appendix A (United States Fish and Wildlife Service Biological Opinion) of the EA.

Noise Environment: The increase of UAS testing is not expected to contribute significantly to the noise environment at NBPL. Both EET and blank firing noise could be considered intrusive but would not increase the community noise levels above 65 A-weighted decibels, Community Noise Equivalent Level. Helicopter usage is anticipated to be audible at sensitive receptors but would not increase the Community Noise Equivalent Level above 65 A-weighted decibels.

Coastal Resources: Most of the proposed testing and training activities would be associated with UAS or occur on existing trails and hardened surfaces. Operators are trained to avoid detection and new testing, and training activities are designed to have minimal impacts. There would be some increases in pedestrian training activities and the use of UxS on unpaved surfaces or on unimproved trails; however, any potential impacts are expected to be minimal. New testing and training activities are designed to have minimal impacts as operators are trained to avoid detection. The proposed designation of HLZs at NBPL would occur on land already disturbed from previous development activities with no impacts on wetlands or surface waters. Therefore, implementation of the Proposed Action would not result in significant impacts on coastal resources.

The Navy also evaluated the effects of the Proposed Action on coastal resources and submitted a negative determination to the California Coastal Commission. In March 2023, the California Coastal Commission submitted their response to Navy, noting to the Navy that with incorporation of conservation and protection measures noted in the EA, the ongoing coordination with the signatory agencies of the PLECA, and due to the locations of the activities, the Commission staff agrees that the proposed training and testing activities at NBPL would not adversely affect coastal resources and concurs with the negative determination made pursuant to 15 CFR Section 930.35 of the National Oceanic and Atmospheric Administration implementing regulations. The negative determination concurrence can be located in Appendix B (California Coastal Commission Negative Determination) of the EA.

Cultural Resources: No cultural resources are located in the additional Beach Landing Sites, new training areas, or new HLZ areas. No significant impacts on cultural resources would occur with implementation of the Proposed Action.

The Navy entered into a Programmatic Agreement with the California State Historic Preservation Officer

(SHPO) in 2014 that enables the NBPL to internally review and legally approve undertakings that are determined to have no adverse effect on historic properties. These decisions are reviewed by the SHPO through an annual report. While the Proposed Action is covered under the Programmatic Agreement, if undertakings are determined to have an adverse effect on historic properties, the Navy will consult with the SHPO and Tribes, in accordance with Section 106 of the National Historic Preservation Act.

Air Quality: Estimated emission increase is below the applicable General Conformity *de minimis* levels. GHG emission increases would not likely contribute to global warming to any discernible extent.

Public Health and Safety: The Navy would follow all applicable safety procedures for testing and training activities. No beach closure affecting swimmers or surfers would occur. There would be no significant impact on public health and safety as a result of impacts on air or water quality, or from noise associated with the Proposed Action. The designation of HLZs to support insertion and extraction activities would likewise have no impact on the public, as these areas are located in areas that are not accessible to the public, and standoff distances and safety protocols will be followed by personnel during operational activities. Implementation of the Proposed Action would not disproportionately affect children given the absence of schools or parks in the immediate area and would not result in significant impacts on public health and safety.

Finding: Based on the analysis presented in the EA ,which has been prepared in accordance with the requirements of NEPA and DON policies and procedures (32 CFR Part 775); consideration of comments received on the public review of the Draft EA; and in coordination with the USFWS, the California Coastal Commission, and the California SHPO, the Navy finds that implementation of the Proposed Action as described in Alternative 2 will not significantly impact the quality of the human or natural environment. Therefore, an Environmental Impact Statement need not be prepared.

Electronic copies of the EA and Finding of No Significant Impact Statement are available on the Navy Region Southwest website (https://cnic.navy.mil/navysouthwestprojects).

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Date

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