Draft
FINDING OF NO PRACTICABLE ALTERNATIVE

1.0 PURPOSE AND NEED

The purpose of the Proposed Action, Dry Creek Sanitary Sewer Line Upgrade at Beale Air Force Base (AFB), California is to replace three segments of the sanitary sewer system that service Military Family Housing (MFH), the Medical Clinic, and the space surveillance site. This project is needed because a recent failure of a sanitary sewer pipe within Dry Creek prompted increased concern regarding the vulnerability of the aging sewer system, which includes multiple creek crossings and above ground pipes located within the stream bed. These crossings show evidence of being underwater during storm events and contain supports that were not properly engineered. Much of the sewer system in this area is remotely located, with no paved access roads or other facilities nearby, making access for inspection and repairs difficult. Without implementation of the proposed project, future heavy rain events could cause similar failures of the sanitary sewer pipe crossings, which could cause environmental impacts associated with discharges from damaged pipelines.

The Proposed Action takes place within a floodplain. Per Executive Orders 11988 and 11990 for actions within a 100-year floodplain and new construction in a wetland respectively, documentation of a Finding of No Practicable Alternative (FONPA) is required.

2.0 DESCRIPTION OF PROPOSED ACTION AND NO ACTION ALTERNATIVE

Proposed Action. Re-route sewer lines to eliminate creek crossings by installing sanitary sewer force main and gravity sanitary sewer pipe line; install new manholes and pump stations along the new sewer line routes; install below ground electrical and communications lines to service new pump stations; abandon existing creek crossings in place.

Alternative Action. One alternative considered was repair the existing sewer system. However, repairs do not adequately address problems associated with existing, aboveground infrastructure that lie within the 100-year floodplain. Any repair without realignment or removal of aboveground infrastructure will not bring the system in compliance with current industry standards. The repair condition could result in a failure and unauthorized discharge of raw sewage into natural waterways in direct violation of the Clean Water Act. This option could be potentially harmful to existing wetlands and floodplains. Thus, this alternative was eliminated from further consideration.

No Action Alternative. If the project is not implemented, the sanitary sewer line would not be upgraded. Future heavy rain events could cause creek crossings to fail, which could cause environmental impacts associated with discharges directly into the creek from damaged pipelines. This would violate the Clean Water Act.

3.0 SUMMARY OF ENVIRONMENTAL EFFECTS

Biological Resources.
There are 10 vernal pools, 4 seasonal wetlands, 6 swales, and 3 seeps ranging from 8 to 248 feet from the project area. All of the vernal pools within 250 feet are either higher in elevation than and/or upstream of the proposed project area, a physical barrier is present, and no construction equipment will enter any of these pools. The U.S. Fish and Wildlife Service concurred (2 July 2014) implementation of the Proposed Action is "not likely to adversely affect" federally listed biological resources (vernal pool fairy shrimp and vernal pool tadpole shrimp) within the project area.

Water Resources.
Surface Water. Implementation of the Proposed Action will have an overall positive impact to water quality by removing a potential raw sewage discharge source from the Dry Creek channel. Sanitary sewer installation will take place across several ephemeral drainages and roadside ditches; however, this work will be conducted when the channels are dry. These channels are considered Waters of the United States (U.S.) and are subject to Clean Water Act Section 404 and 401 requirements. Section 404 permit and Section 401 water quality certification will be obtained before work begins, and adherence to the requirements established in the Section 404 permit and 401 water quality certification will ensure the construction and repairs do not adversely affect wetlands or waters of the U.S. Therefore, no significant effects to surface water are expected from implementation of the Proposed Action.

Floodplain. Implementation of the Proposed Action will have a minor, temporary effect on the 100-year floodplain. The project area is within the 100-year floodplain of Dry Creek, and underground pipelines will be installed within the floodplain. This portion of the project area will be restored to pre-project conditions upon completion of construction; therefore, no significant effects to the floodplain are expected from implementation of the Proposed Action.

Cultural Resources.
There are no known historical properties within the project area. The State Historic Preservation Officer issued a letter of concurrence (7 Aug 2014) on a finding of no historic properties affected as a result of the Proposed Action. If unanticipated cultural resources are encountered during construction, project-related ground-disturbing activities will cease in the area until the resource can be assessed by a qualified archaeologist.

Geological Resources/Soil.
Implementation of the Proposed Action will cause minor soil disturbance during construction. Disturbance of soil during construction may have minor, temporary effects within the project area. The project will implement Best Management Practices to stabilize the soil during construction. Therefore, no significant effects are expected from the implementation of the Proposed Action.

Safety.

Implementation of the Proposed Action will correct safety hazards associated with potential discharge of raw sewage into Dry Creek; therefore, implementation will have a positive impact on safety. Workers at the project site will follow safety plan precautions. Therefore, no significant effects are expected from implementation of the Proposed Action.

4.0 CONCLUSION

The Proposed Action requires work within surface water drainages and the 100-year floodplain to conduct the sanitary sewer pipeline installation activities. There are no practicable alternatives to conducting work in the drainages or the floodplain that allow for the sanitary sewer line upgrade. The attached AF Form 813 and a draft of this FONPA were made available to the public on X for a 30-day review period. X comments were received.

5.0 STATEMENT OF NO PRACTICABLE ALTERNATIVE

The Proposed Action will have no significant independent or cumulative effects on the human or natural environment, and based on 32 CFR 989 appendix B, this project qualifies for a categorical exclusion and requires no further analysis (see attached AF Form 813). Alternatives were considered, but also included work within Waters of the U.S. and 100-year floodplain. Pursuant to Executive Orders 11988 Floodplain Management and 11990 Wetlands Management and the authority delegated by the Secretary of the Air Force 791.1, and taking the above information into account, I find there is no practicable alternative to the action and that the Proposed Action includes all practicable measures to minimize harm to wetlands and minimize harm to or within the floodplain.

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ROY-ALAN C. AGUSTIN, Colonel, USAF Date
Director, Installations and Mission Support

3 Attachments:

1. AF Form 813 for Dry Creek Sanitary Sewer Line Upgrade Project

2. U.S. Fish and Wildlife Concurrence Letter
3. State Historic Preservation Office Concurrence Letter