DEPARTMENT OF DEFENSE
DEPARTMENT OF THE NAVY

FINDING OF NO SIGNIFICANT IMPACT (FONSI) FOR THE ENVIRONMENTAL ASSESSMENT (EA) FOR TREE CUTTING AT AULT FIELD OF NAVAL AIR STATION WHIDBEY ISLAND (NASWI), OAK HARBOR, WASHINGTON

Pursuant to the Council on Environmental Quality regulations (40 Code of Federal Regulations Parts 1500-1508) implementing the National Environmental Policy Act and Navy regulations (32 CFR Part 775), and Chief of Naval Operations Instruction 5090.1D, the Department of the Navy (Navy) gives notice that an EA has been prepared and an Environmental Impact Statement (EIS) is not required for Tree Cutting at Ault Field of NASWI in Oak Harbor, Washington.

A Notice of Availability (NOA) of the Draft EA was published on April 6, 2016 in the Whidbey News Times, South Whidbey Record, Whidbey Examiner, and Skagit Valley Herald. The Draft EA was made available for public review at Oak Harbor, Coupeville, Anacortes, and La Conner public libraries and on the Naval Facilities Engineering Command Northwest (NAVFAC NW) website at http://go.usa.gov/tAr4. The public comment period on the Draft EA was from April 6, 2016 to May 13, 2016. An NOA of the Final EA and FONSI will be published in the same newspapers and copies of the documents will be available on the NAVFAC NW website.

The Navy reviewed and considered all comments that were received during the 30-day Draft EA comment period. A total of 14 comment emails were received on the Draft EA. The majority of the comments were concerned with impacts to habitat and wildlife. Other comments included concerns about carbon sequestration and climate change, soil erosion, spread of diseases (such as Lyme disease), and property devaluation. One comment suggested that the downed wood be made available to the public. Additional commenters raised concerns about noise and public safety related to aircraft operations that are beyond the scope of the proposed action.

As stated in the EA, the proposed action is not expected to have significant impacts to vegetation, soils, and wildlife. The proposed action would introduce no new risks to public health and safety. Although the project site would be visible from nearby residences, tree cutting will not modify land uses adjacent to these residential properties. The Navy does not plan to offer the downed wood to the public because wetland conditions at the site preclude removing the downed trees.

FINDING OF NO SIGNIFICANT IMPACT (FONSI) FOR THE ENVIRONMENTAL ASSESSMENT (EA) FOR TREE CUTTING AT AULT FIELD OF NAVAL AIR STATION WHIDBEY ISLAND (NASWI), OAK HARBOR, WASHINGTON

Proposed Action: The proposed action consists of cutting down and leaving in place 7.6 acres of alder trees at a 9.5-acre site east of Runway 25 at Ault Field of Naval Air Station Whidbey Island in Oak Harbor, Washington. The proposed action consists of felling the trees in order to eliminate visual obstructions to aircraft approaching the runway for landing. The proposed action is planned to occur between September and December 2016. Vegetation would be periodically cut in perpetuity at the 9.5-acre site to prevent re-growth of visual obstructions to runway operations.

The purpose of the proposed action is to ensure Ault Field's Runway 25 can safely support current and future mission requirements. The proposed action is needed to comply with airfield safety zones defined in Federal Aviation Regulation Part 77 and aircraft elevation approach minimum requirements defined in Ault Field's Terminal Instrument Procedures.

Existing Conditions: The project site is located at Ault Field approximately 3,000 feet east of Runway 25. The site slopes to the south from an elevation of 16 feet to 6 feet above mean sea level and is populated with red alder trees. The project site is a forested wetland, with indicators of wetland hydrology, soil saturation, and shallow ponding and flooding in some locations.

Alternatives Analyzed: The Navy analyzed one action alternative (Preferred Alternative) that meets the purpose and need. Three other action alternatives were considered but eliminated from further consideration: relocation of downed trees from the project site via dragging and hauling, relocation of downed trees from the project site via helicopter, and tree topping. Under the No Action alternative the tree cutting would not occur. The No Action alternative does not meet the purpose and need described above; however, as required by National Environmental Policy Act implementing regulations, the No Action alternative was carried forward as a baseline for the analysis in the EA.

Environmental Effects: The following is a summary of the environmental consequences of the Proposed Action:

Water Resources. The Preferred Alternative would result in increased coarse woody debris into the surface waters of the existing wetland in the form of downed trees and branches. Felling of trees by hand is expected to result in no adverse long term water quality impacts as there would be no addition of

fill at the wetland and no dredging, as felled wood would not be removed and vehicles (e.g. heavy equipment) would not enter the wetland. Retaining the woody debris would continue nutrient cycling at the wetland. Felling and leaving in place existing trees, without disturbing their root structure, is not considered dredging or fill material under the Clean Water Act. Felling the trees between parallel and 45 degrees to the elevation contours would minimize obstructions to surface water flow. Felling of the trees may result in a potential increase in surface water levels resulting from a reduction in water loss from canopy interception and evapo-transpiration, particularly in arid summer months. There may be some offset by an increase in surface evaporation from canopy cover loss (increase in sunlight reaching the surface) but overall the duration and presence of surface water is anticipated to increase. The increase in surface water is not expected to increase erosion because the site is relatively flat and the addition of woody debris would reduce erosion potential.

Biological Resources. Periodic cutting back of new tree growth would permanently alter the vegetation community of 7.6 acres of forest to be more similar to the adjacent scrub shrub community for the long-term. No threatened or endangered plant or animal species are known to be located at the project site. A raptor nest, thought to be that of a red-tailed hawk, was identified during field survey of the project site. Cutting of the trees would be conducted between the months of September and December during non-nesting times, in accordance with the installation’s Integrated Natural Resources Management Plan, to minimize potential effects to bald eagles protected under the Bald and Golden Eagle Protection Act and other avian species protected under the Migratory Bird Treaty Act. Leaving the down coarse woody debris in place would ensure the presence of structural complexity and sheltering and foraging habitats for small wetland animals, including amphibians, small reptiles, and mammals.

FINDING OF NO SIGNIFICANT IMPACT (FONSI) FOR THE ENVIRONMENTAL ASSESSMENT (EA) FOR TREE CUTTING AT AULT FIELD OF NAVAL AIR STATION WHIDBEY ISLAND (NASWI), OAK HARBOR, WASHINGTON

Finding: Based on the analysis presented in the EA, the Navy finds that implementation of the proposed action will have no significant impact to the quality of the human environment.

The EA prepared by the Navy addressing this action is on file and interested parties may obtain a copy from: Commanding Officer, Naval Facilities Engineering Command Northwest, 1101 Tautog Circle, Silverdale, WA 98315.

14 JUL 16
Date

Jeffrey S. Ruth
J. S. Ruth
Rear Admiral, U.S. Navy
Commander, Navy Region Northwest

ENVIRONMENTAL ASSESSMENT

For

Tree Cutting

At

Ault Field of Naval Air Station Whidbey Island

May 2016

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Abstract

Designation:	Environmental Assessment
Title of Proposed Action:	Tree Cutting
Project Location:	Ault Field of Naval Air Station Whidbey Island
Lead Agency for the EA:	Department of the Navy
Cooperating Agency:	NA
Affected Region:	Island County, Washington
Action Proponent:	Naval Air Station Whidbey Island
Point of Contact:	NAS Whidbey Island Tree Cutting EA Team NAVFAC NW 1101 Tautog Circle, Suite 203 Silverdale, WA 98315 Or NWNEPA@navy.mil
Date:	May 2016

The Department of the Navy has prepared this Environmental Assessment in accordance with the National Environmental Policy Act, as implemented by the Council on Environmental Quality Regulations and Navy regulations for implementing the National Environmental Policy Act. The proposed action would cut 7.6 acres of trees from a 9.5-acre site east of Runway 25 at Naval Air Station Whidbey Island's Ault Field in Oak Harbor, Washington. Vegetation would be periodically cut in perpetuity at the 9.5-acre site to prevent re-growth of visual obstructions to runway operations. This EA evaluates the potential environmental impacts associated with the proposed action and the No-Action Alternative to the following resource areas: water resources and biological resources.

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EXECUTIVE SUMMARY

Proposed Action

The Navy proposes to cut down and leave in place 7.6 acres of alder trees at a 9.5-acre site east of Runway 25 at Ault Field of Naval Air Station Whidbey Island in Oak Harbor, Washington. The proposed action consists of felling the trees in order to eliminate visual obstructions to aircraft approaching the runway for landing. The proposed action is planned to occur between September and December 2016. Vegetation would be periodically cut in perpetuity at the 9.5-acre site to prevent re-growth of visual obstructions to runway operations.

Purpose of and Need for the Proposed Action

The purpose of the proposed action is to ensure Ault Field's Runway 25 can safely support current and future mission requirements. The proposed action is needed to comply with airfield safety zones defined in Federal Aviation Regulation Part 77 and aircraft elevation approach minimum requirements defined in Ault Field's Terminal Instrument Procedures.

Alternatives Considered

Alternatives were developed for analysis based upon the following reasonable alternative screening factors: permanently eliminating visual obstructions to the runway approach and approach lights, minimizing impacts to runway operations, and minimizing environmental effects. The Navy is evaluating one action alternative that meets the purpose of and need for the proposed action, the Preferred Alternative, and a No Action Alternative. Three action alternatives were considered but eliminated from further consideration because they would not fulfill the purpose of and need for the proposed action. The Preferred Alternative consists of felling all trees within the project boundary with hand tools only (e.g. chainsaws) and leaving them in place. The No Action Alternative consists of not cutting the trees.

Summary of Environmental Resources Evaluated in the EA

Council on Environmental Quality regulations, National Environmental Policy Act, and Navy instructions for implementing NEPA specify that an Environmental Assessment (EA) should address those resource areas potentially subject to impacts. In addition, the level of analysis should be commensurate with the anticipated level of environmental impact. Field survey of the 9.5-acre project site has identified the site as a partially forested wetland protected under Section 404 of the Clean Water Act. Additionally, two raptor nests were observed at the project site and other avian species common to woodlands and potentially protected under the Migratory Bird Treaty Act are present.

The following resource areas have been addressed in this EA: water resources and biological resources. Because potential impacts were considered to be negligible or nonexistent, the following resources were not evaluated in this EA: air quality, geological resources, cultural resources, land use, visual resources, airspace, noise, infrastructure, transportation, public health and safety, hazardous materials and wastes, socioeconomics, and environmental justice.

Summary of Potential Environmental Consequences of the Action Alternatives and Major Mitigating Actions

Water Resources. The Preferred Alternative would result in increased coarse woody debris into the surface waters of the existing wetland in the form of downed trees and branches. Felling of trees by

hand is expected to result in no adverse long term water quality impacts as there would be no addition of fill at the wetland and no dredging, as felled wood would not be removed and vehicles (e.g. heavy equipment) would not enter the wetland. Retaining the woody debris would continue nutrient cycling at the wetland. Felling and leaving in place existing trees, without disturbing their root structure, is not considered dredging or fill material under the Clean Water Act. Felling the trees between parallel and 45 degrees to the elevation contours would minimize obstructions to surface water flow. Felling of the trees may result in a potential increase in surface water levels resulting from a reduction in water loss from canopy interception and evapo-transpiration, particularly in arid summer months. There may be some offset by an increase in surface evaporation from canopy cover loss (increase in sunlight reaching the surface) but overall the duration and presence of surface water is anticipated to increase. The increase in surface water is not expected to increase erosion because the site is relatively flat and the addition of woody debris would reduce erosion potential. The No Action Alternative would not result in changes to water resources. Therefore, implementation the preferred alternative and No Action Alternative would result in no significant impacts to water resources.

Biological Resources. Periodic cutting back of new tree growth would permanently alter the vegetation community of 7.6 acres of forest to be more similar to the adjacent scrub shrub community for the long-term. No threatened or endangered plant or animal species are known to be located at the project site. A raptor nest, thought to be that of a red-tailed hawk, was identified during field survey of the project site. Cutting of the trees would be conducted between the months of September and December during non-nesting times, in accordance with the installation's Integrated Natural Resources Management Plan, to minimize potential effects to bald eagles protected under the Bald and Golden Eagle Protection Act and other avian species protected under the Migratory Bird Treaty Act. Leaving the down coarse woody debris in place would ensure the presence of structural complexity and sheltering and foraging habitats for small wetland animals, including amphibians, small reptiles, and mammals. The No Action Alternative would not result in changes to biological resources. Therefore, implementation of the Preferred Alternative and No Action Alternative would have no significant impact to biological resources.

Public Involvement

The Navy made a draft of this EA available electronically on a website and in hard copy at local libraries for public review and comment in April and May of 2016. Fourteen individuals submitted comments. Comments received during the public review period were considered in the preparation of this EA.

Environmental Assessment

Tree Cutting

Ault Field of Naval Air Station Whidbey Island, Washington

TABLE OF CONTENTS

Abbreviations and Acronyms vii

1 PURPOSE OF AND NEED FOR THE PROPOSED ACTION 1-1

1.1 Introduction 1-1

1.2 Location 1-1

1.3 Purpose of and Need for the Proposed Action 1-1

1.4 Scope of Environmental Analysis 1-2

1.5 Relevant Laws and Regulations 1-2

1.6 Public and Agency Participation and Intergovernmental Coordination 1-3

2 PROPOSED ACTION AND ALTERNATIVES 2-1

2.1 Proposed Action 2-1

2.2 Screening Factors 2-1

2.3 Alternatives Carried Forward for Analysis 2-1

2.3.1 No Action Alternative 2-1

2.3.2 Preferred Alternative 2-1

2.4 Alternatives Considered but not Carried Forward for Detailed Analysis 2-2

2.4.1 Relocation of Downed Trees from Project Site Via Dragging and Hauling 2-2

2.4.2 Relocation of Downed Trees from Project Site Via Helicopter 2-2

2.4.3 Tree Topping 2-3

3 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES 3-1

3.1 Water Resources 3-3

3.1.1 Regulatory Setting 3-3

3.1.2 Affected Environment 3-4

3.1.3 Environmental Consequences 3-4

3.2 Biological Resources 3-5

3.2.1 Regulatory Setting 3-6

3.2.2 Affected Environment 3-6

3.2.3 Environmental Consequences 3-7

3.3 Summary of Potential Impacts to Resources and Impact Avoidance and Impact Avoidance and Minimization 3-8
4 CUMULATIVE IMPACTS **4-1**
4.1 Definition of Cumulative Impacts 4-1
4.2 Scope of Cumulative Impacts Analysis 4-2
4.3 Past, Present, and Reasonably Foreseeable Actions 4-2
4.3.1 Past Actions 4-2
4.3.2 Present and Reasonably Foreseeable Actions 4-2
4.4 Cumulative Impact Analysis 4-3
4.4.1 Water Resources 4-3
4.4.2 Biological Resources 4-4
5 OTHER CONSIDERATIONS REQUIRED BY NEPA **5-1**
5.1 Consistency with Other Federal, State, and Local Laws, Plans, Policies, and Regulations . 5-1
5.2 Irreversible or Irretrievable Commitments of Resources 5-2
5.3 Unavoidable Adverse Impacts 5-2
5.4 Relationship between Short-Term Use of the Environment and Long-Term Productivity . 5-2
6 REFERENCES **6-1**
7 LIST OF PREPARERS **1**

List of Figures

Figure 1-1 Example of Tree Exceedance 1-2
Figure 1-2 Location Map 1-4
Figure 1-3 Project Site 1-5

List of Tables

Table 3-1 Summary of Potential Impacts to Resource Areas 3-9
Table 3-2 Impact Avoidance And Minimization Measures 3-10
Table 5-1 Principal Federal and State Laws Applicable to the Preferred Alternative 5-1

Abbreviations and Acronyms

AICUZ	Air Installation Compatible Use Zone
APE	Area of Potential Effect
BMP	Best Management Practice
CAA	Clean Air Act
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
dB	Decibel
DoD	United States Department of Defense
DoN	United States Department of the Navy
EA	Environmental Assessment
EIS	Environmental Impact Statement
EO	Executive Order
ESA	Endangered Species Act
FAA	Federal Aviation Administration
FONSI	Finding of No Significant Impact
ft	Feet
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
OPNAVINST	Office of the Chief of Naval Operations Instruction
ROI	Region of Influence
SHPO	State Historic Preservation Officer
UFC	Unified Facilities Criteria
U.S.C.	United States Code
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service

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1 Purpose of and Need for the Proposed Action

1.1 Introduction

The Navy proposes to cut trees on approximately 7.6 acres of a 9.5 acre project site east of Runway 25 at Ault Field of Naval Air Station (NAS) Whidbey Island in Oak Harbor, Washington. The proposed action consists of felling the trees in order to eliminate visible obstructions to aircraft approaching the runway for landing. The proposed action would occur between September and January to avoid bird nesting seasons. Vegetation would be periodically cut in perpetuity at the 9.5-acre site to prevent re-growth of visual obstructions to runway operations.

1.2 Location

NAS Whidbey Island is located on central and northern Whidbey Island, in western Washington, approximately 45 miles north of Seattle (Figure 1-2). Encompassing approximately 8,200 acres, NAS Whidbey Island is divided into four distinct parcels: 1) Ault Field (main airfield), 2) Seaplane Base, 3) Lake Hancock, and 4) Outlying Field Coupeville (OLF Coupeville). NAS Whidbey Island is the Navy's only naval aviation installation in the Pacific Northwest. The air station is the home for the Navy's tactical electronic attack aircraft squadrons as well as home to anti-submarine and maritime surveillance squadrons and a signals intelligence reconnaissance squadron. NAS Whidbey Island also has a fleet logistics support squadron and complement of search and rescue helicopters.

The project site is located at Ault Field approximately 3,000 feet (ft) to the east of Runway 25. Runway 25 supports EA-18G Growler, P-3C Orion, P8 Poseidon, EP-3E ARIES II and C-40 Clipper aircraft, among others. The project site is located in Runway 25's Accident Potential Zone (APZ) 1 within which development is restricted due to potential for aircraft mishaps and noise associated with airfield operations (AOP; Navy 2004). The site slopes to the south from an elevation of 16 ft to 6 ft above mean sea level (Figure 1-3) and is populated with red alder trees.

1.3 Purpose of and Need for the Proposed Action

The purpose of the proposed action is to ensure Ault Field's Runway 25 can safely support current and future mission requirements. The proposed action is needed (1) to comply with airfield safety zone standards defined in Federal Aviation Regulation (FAR) Part 77; and (2) to restore visibility of Runway 25's approach lights.

Airfield Safety Zone Standards. FAR Part 77 defines the requirements for safe operation of aircraft at all military airfields, including height restrictions of objects around runways, their lateral distances to runways, and clear zones/takeoff safety zones immediately adjacent to runways (Navy 1982). Two of the primary objectives of the requirements are to prevent aircraft collisions with objects protruding into flight paths and to ensure visibility by pilots during takeoff and landing.

The Navy complies with runway clear zones contained in Unified Facilities Criteria (UFC) 3-260-1, which are based on FAR Part 77. UFC 3-260-1 identifies types of clear zones defined by their lateral distances from the end of a runway: Clear Zone I extends to 1,000 ft beyond the end of a runway and Clear Zone II extends from 1,000 to 3,000 ft beyond the end of a runway. Vegetation within Clear Zones I and II must be cleared to ground level. Beyond Clear Zone II, UFC 3-260-1 criteria preclude the presence of vertical obstructions above an approach-departure clearance surface, defined as a plane with an elevation gain at a ratio of 50:1 beginning 200 ft from the end of a runway. Trees, as a category of vertical obstructions,

are required by UFC 3-260-1 to be kept at an elevation 10 ft lower than the approach-departure clearance surface (Figure 1-1). The project site is located 3,000 ft beyond the end of Runway 25 and is subject to the approach-departure clearance surface requirements. Survey of airfield obstructions indicates the trees at the project site exceed UFC 3-260-1 approach-departure clearance surface requirements for Runway 25 by at least 12 ft (Navy, 2010).

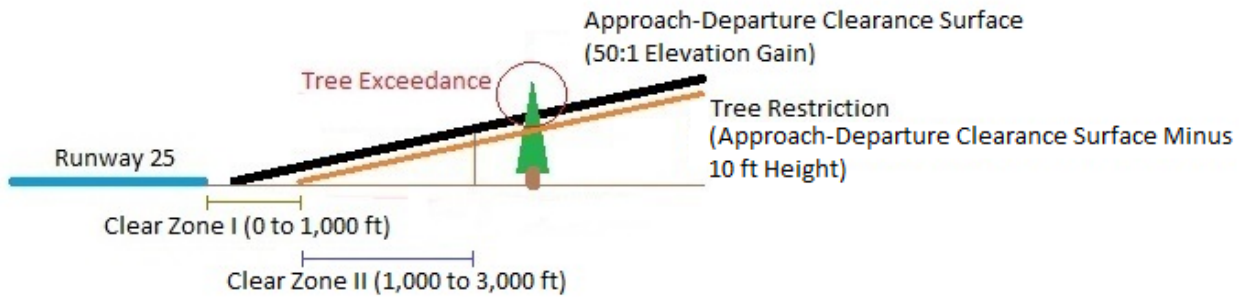

Figure 1-1 Example of Tree Exceedance

Runway Approach Lights. Ault Field's Terminal Instrument Procedures (TERPs) control the day to day operation of the airfield and define runway approach requirements. Aircraft approaching Runway 25 must fly above a certain minimum glide-slope approach height, which is based on features and conditions that limit the runway's safe usage (including, but not limited to, terrain, vegetation, structures, weather, and ambient light conditions) or conditions that improve a runway's safe usage (such as approach lights). Ault Field's existing approach lights east of Runway 25, illustrated in Figure 1-3, enable aircraft using Runway 25 to approach the runway at an altitude 100 ft lower during inclement weather or low light conditions than is otherwise allowable by TERPs. However, the trees at the project site have grown to a height such that they are now obstructing visibility of the approach lights and increasing minimum glide-slope approach heights, resulting in occasional closures of Runway 25 during inclement weather and low ambient light conditions.

1.4 Scope of Environmental Analysis

This Environmental Assessment (EA) includes an analysis of potential environmental impacts associated with the Preferred Alternative and the No Action Alternative. The environmental resource areas analyzed in this EA include: water resources and biological resources.

1.5 Relevant Laws and Regulations

The Navy has prepared this EA based upon federal and state laws, statutes, regulations, and policies that are pertinent to the implementation of the proposed action, including the following:

- National Environmental Policy Act (NEPA; 42 United States Code [U.S.C.] sections 4321-4370h), which requires an environmental analysis for major federal actions that have the potential to significantly impact the quality of the human environment
- Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA (40 CFR parts 1500-1508)
- Navy regulations for implementing NEPA (32 CFR part 775), which provides Navy policy for implementing CEQ regulations and NEPA

- Clean Water Act (CWA) (33 U.S.C. section 1251 et seq.)
- National Historic Preservation Act (NHPA) (54 U.S.C. section 306108 et seq.)
- Endangered Species Act (ESA) (16 U.S.C. section 1531 et seq.)
- Migratory Bird Treaty Act (MBTA) (16 U.S.C. section 703-712)
- Bald and Golden Eagle Protection Act (16 U.S.C. section 668-668d)
- EO 11988, Floodplain Management
- EO 13175, Consultation and Coordination with Indian Tribal Governments

A description of the proposed action's consistency with these laws, policies and regulations, as well as the names of regulatory agencies responsible for their implementation, is presented in Chapter 5 (Table 5-1).

1.6 Public and Agency Participation and Intergovernmental Coordination

The Navy made a draft of this EA available electronically on a website and in hard copy at local libraries for public review and comment in April and May of 2016. Fourteen individuals submitted comments. Comments received during the public review period were considered in the preparation of this EA.

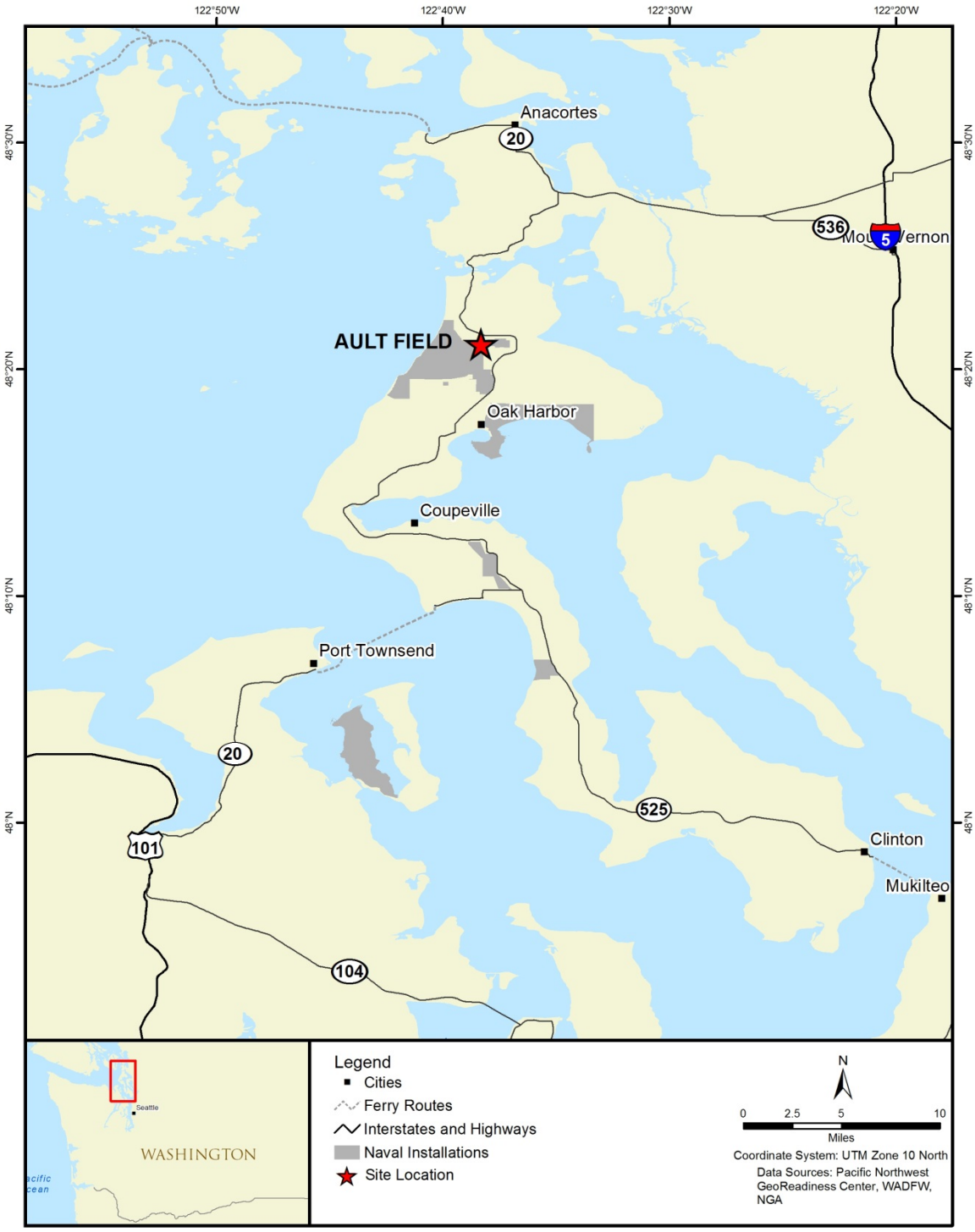

Figure 1-2 Location Map

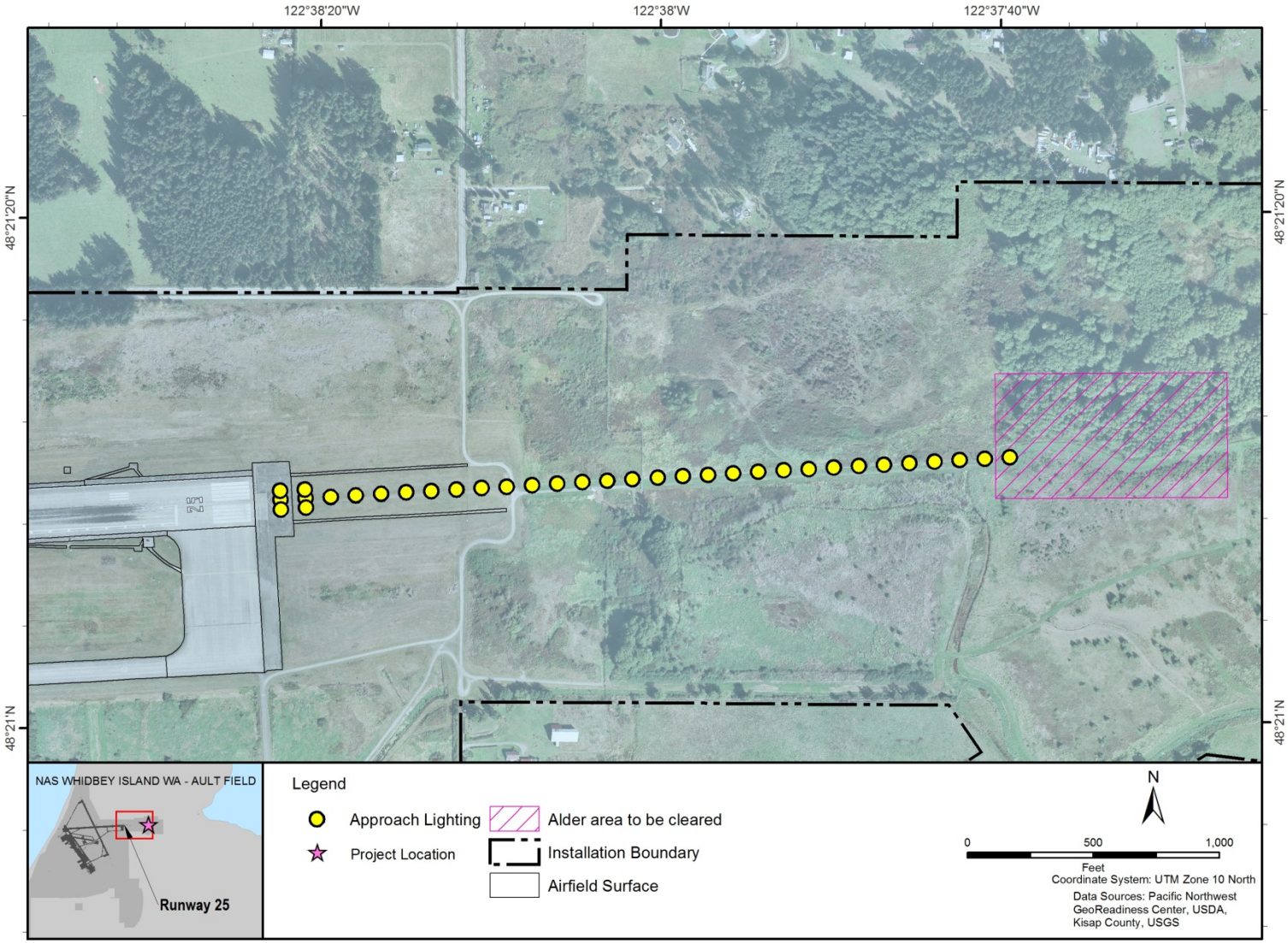

Figure 1-3 Project Site

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2 Proposed Action and Alternatives

2.1 Proposed Action

The Navy proposes to cut down and leave in place 7.6 acres of alder trees at a 9.5-acre site east of Runway 25 at Ault Field of Naval Air Station Whidbey Island in Oak Harbor, Washington. The proposed action consists of felling the trees in order to eliminate the runway of visible obstructions to aircraft approaching the runway for landing. The proposed action is planned to occur between September and December 2016 to avoid bird nesting seasons. Vegetation would be periodically cut in perpetuity at the 9.5-acre site to prevent re-growth of visual obstructions to runway operations.

2.2 Screening Factors

NEPA's implementing regulations provide guidance on the consideration of alternatives to a federally proposed action and require rigorous exploration and objective evaluation of reasonable alternatives. Only those alternatives determined to be reasonable and meet the purpose and need require detailed analysis. Potential alternatives that meet the purpose and need were evaluated against the following screening factors:

- Permanently managing vegetation height at the approach to Runway 25 to keep it clear of visual obstructions per requirements of Federal Aviation Regulation (FAR) Part 77.
- Permanently eliminating visual obstructions to the approach lights at Runway 25.
- Minimizing impacts to Runway 25 operations.
- Minimizing environmental effects, particularly water quality effects to the wetland at the project site.
- Feasibility of implementation over both the long and short term.

2.3 Alternatives Carried Forward for Analysis

Based on the reasonable alternative screening factors and meeting the purpose and need for the proposed action, one action alternative is analyzed in this Environmental Assessment (EA): the Preferred Alternative.

2.3.1 No Action Alternative

Under the No Action Alternative, the proposed action would not occur. The stand of alder trees would remain in exceedance of approach-departure clearance requirements for Runway 25 and would continue to obstruct the runway's approach lights. The No Action Alternative would not meet the purpose and need for the proposed action; however, as required by NEPA, the No Action Alternative is carried forward for analysis in this EA and provides a baseline for measuring the environmental consequences of the action alternatives.

2.3.2 Preferred Alternative

Under the Preferred Alternative, the 7.6 acres of trees within the 9.5-acre project site would be cut at stump height (typically 12 to 16 inches). Trees at the site consist primarily of red alders averaging 125 ft in height and ranging in size from 8 to 27 inches in diameter (Navy, 2015a). The trees are estimated to

be between 40 and 70 years in age. To avoid water quality impacts to the wetland located on-site, tree cutting would occur with hand equipment (e.g. chainsaws) only and felled trees would be left in place (no dragging or heavy equipment in the wetland). No disturbances to root systems would occur and trees would not be hauled from the project site. Trees would be cut to fall between parallel and 45 degrees to the slope of the landscape and to the north along the southern extent of the project site to ensure the access road and perennial ditch along the southern edge of the project site remains unobstructed. Tree clearing is planned to occur between the September 1 and December 31 to avoid potential impacts to bald eagles and nesting migratory birds. Total duration of initial tree cutting activities is expected to take approximately eight days and would be completed within one month. Future tree growth at the project site would likewise continue to be cut as needed following similar protocols and timing constraints, with cutting occurring between the months of September and December. All tree cutting activities would be conducted in accordance with the U.S. Army Corps of Engineers Safety and Health Requirements Manual. A project-specific job hazard analysis and accident prevention plan would be prepared and followed by all workers at the site.

2.4 Alternatives Considered but not Carried Forward for Detailed Analysis

The following alternatives were considered, but not carried forward for detailed analysis in this EA as they did not meet the purpose and need for the project and satisfy the reasonable alternative screening factors presented in Section 2.2.

2.4.1 Relocation of Downed Trees from Project Site Via Dragging and Hauling

Under this action alternative, the 7.6 acres of felled trees within the 9.5-acre project site would be relocated from the project site with heavy equipment by dragging the timber from the cut site for loading and hauling. The timber would be either re-purposed or sold under the Navy's forestry program. This alternative was considered but is not being carried forward for detailed analysis in the EA because the use of heavy equipment to remove the trees from the site would result in the disturbance of sediment and dredging in the wetland and corresponding impacts. No viable method of removing the felled trees from the site over land was identified that could adequately avoid impacts to the wetland, including the use of wetland mats for holding heavy equipment. No wetland mats were identified that could prevent unacceptable partial submersion of equipment, including low ground pressure equipment, that would be necessary for retrieving downed trees from the project site. Therefore, this action alternative would not satisfy the screening factor to minimize environmental effects and was eliminated from further consideration in the EA.

2.4.2 Relocation of Downed Trees from Project Site Via Helicopter

Under this action alternative, the 7.6 acres of felled trees within the 9.5-acre project site would be retrieved by helicopter and transported by air to a log landing in a dry location for subsequent loading and hauling to a mill. The timber would be sold under the Navy's forestry program. This alternative was considered but is not being carried forward for detailed analysis in the EA because the use of a helicopter at the Runway 25 approach would interfere with runway operations and would require a waiver of FAA regulations for use of the airspace for logging operations. Therefore, this action alternative would not satisfy the screening factor to minimize impacts to Runway 25 operations and was eliminated from further consideration in the EA.

2.4.3 Tree Topping

Under this action alternative, the 7.6 acres of trees within the 9.5-acre project site would not be cut at the base and would instead be topped to reduce their height below a level of visual obstruction. Survey data indicates the trees would need to be reduced in height by a minimum of 15 ft to meet UFC 3-260-01 requirements based on their distance and orientation from the runway (Navy, 2010). The Navy determined that topping the trees would only temporarily resolve visual obstructions identified in UFC 3-260-01; the trees would need to be cut again within approximately 10 years in order to meet UFC requirements. Because the site is inaccessible to heavy equipment, tree climbing would be required. However, tree climbing would be unsafe as alder trees are known to be brittle and break easily putting the climber at considerable risk. Additionally, topping typically results in denser and heavier regrowth making subsequent top pruning endeavors even more unsafe. For these reasons tree topping is not a viable alternative. Therefore, this alternative was eliminated from further consideration in the EA as it would not satisfy the screening factors to permanently remove visual obstructions from the approach to Runway 25.

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3 Affected Environment and Environmental Consequences

This chapter presents a description of the environmental resources and baseline conditions that could be affected from implementing either of the alternatives and an analysis of the potential direct and indirect effects of the alternatives. All potentially relevant environmental resource areas were initially considered for analysis in this Environmental Assessment (EA). In compliance with National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ), and 32 Code of Federal Regulations (CFR) part 775 guidelines, the discussion of the affected environment (i.e., existing conditions) focuses only on those resource areas potentially subject to impacts. Additionally, the level of detail used in describing a resource is commensurate with the anticipated level of potential environmental impact.

"Significantly," as used in NEPA, requires considerations of both context and intensity. Context means that the significance of an action must be analyzed in several contexts such as society as a whole (e.g., human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of a proposed action. For instance, in the case of a site-specific action, significance would usually depend on the effects in the locale rather than in the world as a whole. Both short and long-term effects are relevant (40 CFR part 1508.27). Intensity refers to the severity or extent of the potential environmental impact, which can be thought of in terms of the potential amount of the likely change. In general, the more sensitive the context, the less intense a potential impact needs to be in order to be considered significant. Likewise, the less sensitive the context, the more intense a potential impact would be expected to be significant. This section addresses water resources and biological resources.

The potential impacts to the following resource areas are considered to be negligible or non-existent so they were not analyzed in detail in this EA: air quality, geological resources, cultural resources, American Indian traditional resources, land use, visual resources, airspace, noise, infrastructure, transportation, public health and safety, hazardous materials and wastes, socioeconomics, and environmental justice.

Air Quality: Effects on air quality from implementation of the Preferred Alternative would be insignificant due to the attributed air sources and the attainment designation of Island County in relation to the National Ambient Air Quality Standards. As described in 40 CFR Part 51, Determining Conformity of General Federal Actions to State or Federal Implementation Plans (the "General Conformity Rule"), federal actions occurring in air basins designated in nonattainment or in a maintenance area must conform to an applicable implementation plan. Since Island County is designated as an attainment area for all criteria pollutants, the General Conformity Rule does not apply. Air emissions would result from temporary mobile sources and would not be evaluated with respect to Prevention of Significant Deterioration, nor would any new stationary emission sources be constructed. Therefore, New Sources Review and PSD requirements do not apply. With respect to greenhouse gas, the Preferred Alternative is not reasonably anticipated to cause direct emissions of 25,000 metric tons or more of carbon dioxide-equivalent emissions. Therefore, further quantitative or qualitative assessment of greenhouse gas emissions is not required for the Preferred Alternative.

Geological Resources: The project site contains no unique geological resources of particular value. Topological features do not present a risk of landslides and there are no structures on the site potentially affected by seismic activity. Proposed tree clearing activities are not expected to result in accelerated erosion of the project site, as trees would be felled by hand and left in place. No heavy machinery would be used that could cause excessive disturbance to sediments in the wetland or present

erosion risks. Trees would be felled at a 45 degree angle to the contour of the land and would not affect surface water flows that could impact local soils. Decomposition of coarse woody debris from the felled trees and future tree cutting activities would be expected to replenish nutrient cycling of the onsite wetland and associated soils.

Cultural Resources: A project-specific cultural resources field survey was not conducted for the Preferred Alternative; however, the Preferred Alternative would not result in ground disturbances such as dredging or excavating. No impacts to historic properties or historic view sheds would result from the Preferred Alternative. In accordance with Section 106 of the National Historic Preservation Act, the Navy provided letters to the State Historic Preservation Officer identifying the area of potential effect for the Preferred Alternative as the project site and indicating no historic properties affected on January 19 and 26, 2016 respectively (Appendix A). The Navy also provided letters to the potentially affected tribes, the Samish Indian Nation, Stillaguamish Tribe of Nations, Swinomish Indian Tribal Community, and the Upper Skagit Indian Tribe requesting comments on the Navy's determination of no historic properties affected by the Preferred Alternative. The Samish Indian Nation indicated they have no cultural resources concerns with the Preferred Alternative. No other responses were received from the tribes. The SHPO concurred with the Navy's identification of the APE and determination of no historic properties affected on January 25 and February 1, 2016, respectively (Appendix A).

American Indian Traditional Resources: This action would have no effect to traditional resources because it would not affect any tribe's access to exercise tribal treaty rights and it would not reduce or degrade harvestable marine resources.

Land Use: The Preferred Alternative is consistent with existing land use plans and designations. The project site is located in Runway 25's Accident Potential Zone (APZ) 1 clear zone within which development and other uses are restricted due to potential for aircraft mishaps and noise associated with airfield operations (AOP; Navy, 2004). Only those with flight line access are allowed entry to the project site. The project site is included in forest management unit #5 of the installation's Integrated Natural Resources Management Plan (Navy, 2012), which indicates that trees may need to be removed at the project site to maintain or restore airfield glide slope. Following tree cutting, the project site would be removed from forest management unit #5 because it would no longer be managed for forest resources.

Visual Resources: The Preferred Alternative would alter the visual setting of the approach to Runway 25 by felling trees and leaving them in place within the project site. The felled trees would be visible from up to eight residences located off-installation to the northwest, east, and south of the Ault Field boundary. The nearest residences with direct line of sight are located .25 mile to the northwest and south of the project site. The tree cutting activities would be consistent with the installation's 2004 AOP identifying the project site as a clear zone to be kept clear of vegetation.

Airspace: The Preferred Alternative would result in no change to airspace designations at or surrounding NAS Whidbey Island. The airspace above the project site is designated for military air operations. The Preferred Alternative would not introduce new obstructions into the established airspace or conflict with existing airspace uses.

Noise: Noise from chainsaws, the primary noise source during tree felling activities, occurs at a maximum of 84 decibels at a distance of 50 ft (Washington Department of Transportation, 2015). Noise from chainsaws would attenuate to below 60 dBA at the installation's boundaries and would not exceed

maximum permissible environmental noise levels defined by Washington Administrative Code 173-60-040. The Preferred Alternative would occur during daylight hours only between 7 am and 9 pm.

Infrastructure: The Preferred Alternative involves no modifications to infrastructure or increases in utilities services.

Transportation: The Preferred Alternative involves no impacts to transportation. Tree cutting crews would arrive at the project site via an existing access road and use only existing access roads while on site.

Public Health and Safety: The Preferred Alternative would introduce no new risks to public health and safety. Public access to the project site is prohibited. The airfield is protected and the project site is fenced. Only those with flight line access are allowed entry to the project site.

Hazardous Materials and Wastes: Tree cutting would require lubricants and fuel for handheld equipment used to fell trees. Equipment would be refueled and oiled in accordance with best management practices (BMPs) to prevent unintended spills and releases. Lubricating and refueling equipment would be prohibited in the wetland. If any releases of fuel or lubricants from tree clearing equipment are identified during cutting activities, the cause of the release would be determined and resolved, and any releases cleaned, prior to continuing use of the equipment.

Socioeconomics: Tree cutting activities would occur on the installation and all felled trees would be left in place; resulting timber would not be sold.

Environmental Justice: Tree cutting activities would result in no disproportionate adverse impacts to minorities or low income populations. The project site is located entirely on-installation.

3.1 Water Resources

This discussion of water resources addresses surface waters and wetlands. Wildlife and vegetation are addressed in Section 3.2, Biological Resources. Surface water resources generally consist of wetlands, lakes, rivers, and streams. Surface water is important for its contributions to the economic, ecological, recreational, and human health of a community or locale. Wetlands are jointly defined by U.S. Environmental Protection Agency (USEPA) and U.S. Army Corps of Engineers (USACE) as “those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions.” Wetlands generally include “swamps, marshes, bogs and similar areas.”

3.1.1 Regulatory Setting

Wetlands are currently regulated by the USACE under Section 404 of the Clean Water Act (CWA) as a subset of all “Waters of the United States.” The term “Waters of the United States” has a broad meaning under the CWA and incorporates deep water aquatic habitats and special aquatic habitats, including wetlands. Jurisdictional Waters of the United States regulated under the CWA include coastal and inland waters, lakes, rivers, ponds, streams, intermittent streams, and “other” waters that, if degraded or destroyed, could affect interstate commerce. The full regulatory definition of Waters of the United States is provided in the Clean Water Act.

Executive Order 11990, *Protection of Wetlands,* requires that federal agencies adopt a policy to avoid, to the extent possible, long and short-term adverse impacts associated with destruction and modification of wetlands and to avoid the direct and indirect support of new construction in wetlands whenever there is a practicable alternative.

Section 404 of the CWA authorizes the Secretary of the Army, acting through the Chief of Engineers, to issue permits for the discharge of dredge or fill into wetlands and other Waters of the United States. Any discharge of dredge or fill into Waters of the United States requires a permit from the USACE.

3.1.2 Affected Environment

The following discussions provide a description of the existing conditions at the project site.

3.1.2.1 Surface Water

Freshwater streams occurring on NAS Whidbey Island fall within two categories: (1) coastal streams draining small watersheds or water bodies, and (2) complexes of drainage channels manipulated for specific land management purposes. The latter were originally shallow, meandering watercourses that were channelized and straightened, and the attendant riparian vegetation was removed. Stormwater on Ault Field is collected via storm drains, underground pipes, and open ditches and is discharged into the Strait of Juan de Fuca, Dugualla Bay, Crescent Harbor, and Oak Harbor. Very high levels of petroleum hydrocarbons were reported in the sediments and soils of the runway ditch complex, but the ditches were dredged in the late 1990s, and the spoils were deposited in the landfill, then capped and sealed (Navy 2013). A small unnamed stream associated with the airfield's storm drainage system runs .25 mile to the south of the project site toward Dugualla Bay.

3.1.2.2 Wetlands

Wetlands at NAS Whidbey Island occur on soils with low infiltration rates, in streams, or in constructed ditches. Wetlands that are not within stream channels or ditches occupy about 1,147 acres of land within NAS Whidbey Island. The primary functions of the wetlands at NAS Whidbey Island are to provide fish and wildlife habitat, recreational opportunities, flood attenuation, and water quality enhancement (Navy, 1996).

On April 20, 2015, Navy environmental staff conducted a field survey of the forested portion of the project site for potential wetlands, threatened or endangered plant species, and to assess potentially merchantable wood. The field survey determined that the project site is a forested wetland, with indicators of wetland hydrology and with near continuous soil saturation and shallow ponding and flooding in some locations. Additionally, hydric soils and hydrophytic vegetation conditions were present to indicate that the entirety of the project site is a forested wetland community. USFWS National Wetlands Inventory identifies the project site as freshwater forested/shrub (USFWS, 2015) and the installation's Integrated Natural Resources Management Plan (INRMP) identifies the wetland as temporarily, seasonally flooded (Navy, 2012).

3.1.3 Environmental Consequences

3.1.3.1 No Action Alternative

Under the No Action Alternative, the proposed action would not occur. The stand of alder trees would continue to grow and obstruct runway approach lights and exceed approach-departure surface requirements for trees. The No Action Alternative would not meet the purpose and need for the

proposed action; however, as required by NEPA, the No Action Alternative is carried forward for analysis in this EA and provides a baseline for measuring the environmental consequences of the action alternatives.

3.1.3.2 Preferred Alternative

The Preferred Alternative would result in the cutting and permanent elimination of tree canopy from the forested wetland. Canopy would be removed from 7.6 of the 9.5 acres and the entirety of the 9.5-acre site would be maintained to prevent trees from becoming visual obstructions. Effects would be localized to the project site. Trees would be felled at 45 degrees to the contour of the land; alterations in hydrology at the project site are not anticipated due to the gradual 2 percent slope of the land. Retention of coarse woody debris at the project site is anticipated to reduce erosion (Hagan and Grove 1999). The removal of tree canopy shading would result in increased evaporation of water from the wetland, particularly during summer months during warmer temperatures in the absence of shading. However, this effect is expected to be more than offset by a reduction in water loss from tree canopy moisture interception and evapo-transpiration (Lockaby et al, 1997; Woodward et al, 2014). Additionally, lower cover hydrophytic vegetation would be expected to increase and would partially offset the loss of tree shade during the summer months.

Equipment would be refueled and oiled in accordance with best management practices (BMPs) to prevent unintended spills and releases. Lubricating and refueling equipment would be prohibited in the wetland. If any releases of fuel or lubricants from tree clearing equipment are identified during clearing activities, the cause of the release would be determined and resolved and released fluids would be cleaned prior to continuing use of the equipment.

Since the trees would be cut at stump height (typically 12 to 16 inches) or above and left in place, there would be no impacts to water quality from sedimentation resulting from removing the downed trees from the project site or removing the tree roots. No new material would be added to or removed from the wetland. The preferred alternative would not result in dredging or a placement of fill as defined under Section 404 of the Clean Water Act. Felling the trees and leaving them in place would support aquatic wildlife habitat (Smith and Sutherland, 2014; Rittenhouse et al, 2008; Todd et al, 2009), consistent with the wetland's current function (Navy, 2013). Leaving the trees in place would support the continuation of nutrient cycling in the wetland as the down coarse woody material from the trees decomposes over time via natural processes (Hagan and Grove, 1999). Therefore, the Preferred Alternative would result in no significant impact to water resources.

3.2 Biological Resources

Biological resources include living, native, or naturalized plant and animal species and the habitats within which they occur. Plant associations are referred to generally as vegetation, and animal species are referred to generally as wildlife. Habitat can be defined as the resources and conditions present in an area that support a plant or animal. Within this EA, biological resources are divided into two categories: (1) terrestrial vegetation and (2) terrestrial wildlife. No federally threatened or endangered species are known to occur at the project site. Species afforded federal protection under the Migratory Bird Treaty Act (MBTA) and Bald and Golden Eagle Protection Act are further addressed below.

3.2.1 Regulatory Setting

Birds, both migratory and most native-resident bird species, are protected under the MBTA, and their conservation by federal agencies is mandated by Executive Order 13186 (Migratory Bird Conservation). Under the MBTA it is unlawful by any means or in any manner, to pursue, hunt, take, capture, kill, attempt to take, capture, or kill, [or] possess migratory birds or their nests or eggs at any time, unless permitted by regulation.

Bald and golden eagles are protected by the Bald and Golden Eagle Protection Act. This act prohibits anyone, without a permit issued by the Secretary of the Interior, from taking bald eagles, including their parts, nests, or eggs. The Act defines "take" as "pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb. Bald eagles are also protected within Washington State by the Bald Eagle Protection Rules Washington Code 232-12-292 and enabling legislation in Revised Code of Washington 77.12.655.

3.2.2 Affected Environment

The following is a description of the existing conditions of biological resources at the project site.

3.2.2.1 Terrestrial Vegetation

Approximately 7.6 acres of the project site is dominated by red alder (*Alnus rubra*) wetland forest vegetation cover type with 1.9 acres of scrub shrub wetland comprising the southern portion of the project site. Red alders at the site average 125 ft in height and range in size from 8 to 27 inches in diameter (Navy, 2015a). The trees are estimated to be between 40 and 70 years in age. Dominant plant species in the alder forest identified during a field survey by Navy environmental staff during an April 20, 2015 field survey are coast black gooseberry (*Ribes divaricatum*), false lily of the valley (*Mianthemum dilatatum*), lady fern (*Athyrium filix-feminia*), red alder (*Alnus rubra*), salmon berry (*Rubus spectabilis*), skunk cabbage (*Lysichiton americanum*), and stinging nettle (*Urtica dioica*; Navy, 2015a). Dominant species in scrub shrub are wild rose (*Rosa pisocarpa*), snowberry (*Symphoricarpos albus*), Himalayan blackberry (*Rubus armeniacus*), Douglas spiraea (*Spiraea douglasii*), Pacific ninebark (*Physocarpus caitatus*), red alder saplings, and willow saplings (*Salix alba*; Navy, 2013).

3.2.2.2 Terrestrial Wildlife

Wildlife includes all animal species (i.e. insects and other invertebrates, fish, amphibians, reptiles, birds, and mammals) focusing on the species and habitat features of greatest importance or interest. A brief summary of these species is provided below. The project site does not contain habitat likely to support threatened or endangered terrestrial species. The project site supports avian species protected under the MBTA and Bald and Golden Eagle Protection Act; these species are the focus of this analysis, which are further addressed below.

Reptiles potentially resided at or traversing the project site include northwestern pond turtle (*Clemmys marmorata*), northern alligator lizard (*Elgaria coerulea principis*), wandering garter snake (*Thamnophis elegans vagrans*), Puget Sound garter snake (*Thamnophis sirtalis pickeringi*), and northwestern garter snake (*Thamnophis ordinoides*). Amphibians potentially present include rough-skinned newt (*Taricha granulosa*), northwestern salamander (Ambystoma gracile), western long-toed salamander (*Ambystoma macrodactylum macrodactylum*), ensatina (*Ensatina eschscholtzii*), western red-backed salamander (*Plethodon vehiculum*), northern red-legged frog (*Rana aurora aurora*), bullfrog (*Rana catesbeiana*),

western toad (*Bufo boreas*), and Pacific treefrog (*Pseudacris regilla*). The project site may also host a variety of common terrestrial mammal species of opossums, shrews, moles, bats, rabbits, squirrels, pocket gophers, and New World rats and mice, jumping mice, foxes, raccoons, and weasels.

Up to 53 bird species may nest at, forage in, or otherwise occur at the project site, including geese, ducks, doves, owls, swifts, hummingbirds, woodpeckers, flycatchers, swallows, chickadees, bushtits, nuthatches, creepers, wrens, thrushes, shrikes, waxwings, vireos, sparrows, warblers and weavers. Potentially occurring raptors consist of bald eagles (*Haliaeetus leucocephalus*), northern harriers (*Circus cyaneus*), sharp-shinned hawks (*Accipiter striatus*), Cooper's hawk (*Accipiter cooperii*), northern goshawk (*Accipiter gentilis*), red-shouldered hawk (*Buteo lineatus*), red-tailed hawk (*Buteo jamaicensis*), and golden eagle (*Aquila chrysaetos;* Navy, 2013).

During an April 20, 2015 field survey, a nest of a raptor species, likely to be that of a red-tailed hawk, was identified at the project site (Navy, 2015a). The installation's INRMP identifies the project site as a combination of potential nesting/roosting habitat and low-use habitat for bald eagles. The INRMP identifies two measures for bald eagle management at the project site, DH-1 and DH-2. Measure DH-1 calls for the removing or modifying all structures near the ends of the Ault Field runways that could be used by eagles for perching. Measure DH-2 calls for implementation of the installation bird aircraft strike hazard (BASH) plan to discourage bald eagle use near the ends of the runways and other high-hazard zones on the airfield, and indicates that any bald eagle trapping and relocation should focus on juvenile eagles or adults outside the nesting season of September 1 to December 31 (Navy, 2013).

3.2.3 Environmental Consequences

This analysis focuses on wildlife or vegetation types that are important to the function of the ecosystem or are protected under federal or state law or statute.

3.2.3.1 No Action Alternative

Under the No Action Alternative, the Preferred Alternative would not occur and there would be no change to biological resources. Therefore, no significant impacts to biological resources would occur with implementation of the No Action Alternative.

3.2.3.2 Preferred Alternative

The study area for the analysis of effects to biological resources associated with the Preferred Alternative comprises the project site.

Vegetation

Under the Preferred Alternative trees across approximately 7.6 acres of the project site, almost exclusively red alder, would be felled and left in place. This would alter the vegetation community of the project site and is expected to result in repopulation by moss and vegetation on the decomposing coarse woody debris and hydrophytic plants associated with the wetland substrate. Periodic cutting of new tree growth would permanently alter the vegetation community from a forest stand to be more similar to the scrub shrub community comprising 1.9 acres of the project site. Plants consistent with scrub shrub vegetation would become dominant: wild rose, snowberry, Himalayan blackberry, Douglas spiraea, Pacific ninebark, red alder saplings, and willow. Removal of the trees could also increase the potential for population by invasive plant species, including poison hemlock (*Conium maculatum*) and Canada thistle (*Cirsium arvense*). Retention of the downed trees on-site would support nutrient cycling

in soils and prevent nutrient loss (Hagan and Grove, 1999; Lal, 2005). Cutting of the trees is expected to result in a reduction of water loss from the wetland due to canopy interception and evapo-transpiration which may be partially offset by increased evaporation (Lockaby et al, 1997; Woodward et al, 2014). No federally listed threatened or endangered plant species would be significantly impacted by the Preferred Alternative. Therefore, the Preferred Alternative would result in no significant impacts to vegetation.

Terrestrial Wildlife

Under the Preferred Alternative more mobile wildlife species, such as mammal and bird species, at the project site would temporarily relocate during tree cutting. No threatened and endangered wildlife species would be impacted as none occur or are expected to occur at the project site. Mortality may result to some less mobile species, including amphibians and reptiles. However, structural complexity resulting from retention of down coarse woody debris from the felled trees is expected to provide for continuity or improvement of habitat for amphibious species (Smith and Sutherland, 2014; Rittenhouse et al, 2008; Todd et al, 2009). Retention of coarse woody debris would likewise contribute to structural complexity of the substrate and habitat creation and retention for insect and small mammal populations (Woodall and Williams, 2005). In addition, a slight increase in water level of the wetland is anticipated (as discussed in Section 3.1.3.2), which could increase the amount of breeding and rearing habitat for amphibious species.

Tree cutting activities at the project site would occur between the months of September and December when birds, including those protected under the MBTA and Bald and Golden Eagle Protection Act, would be least likely to be nesting at the project site. Any potential juveniles at the observed raptor nest on-site would have fledged and the nest would not be active at the time tree cutting occurs (Navy, 2016). Therefore, taking of MBTA protected species would not to occur. The Preferred Alternative would also be consistent with the installation's INRMP and Bird Aircraft Strike Hazard (BASH) Plan, which identify soaring raptors as among the highest risk BASH issues occurring around Ault Field and call for a long term habitat management approach of clearing and keeping vegetation cleared from the ends of runways to prevent attracting bird activity (Navy, 2012 and 2013). Tree cutting would be consistent with the measures DH-1 in the installation's INRMP (Navy, 2013) for managing bald eagles at the end of the runway by removing potential perching locations. The preferred alternative would also be consistent with measure DH-2 by discouraging bald eagle perching at the end of the runway. Any effects of relocating bald eagles from the project site resulting from tree cutting would occur outside the nesting season, consistent with measure DH-2 (Navy, 2013).

In summary, the Preferred Alternative would displace terrestrial wildlife species during tree cutting and vegetation management activities and would remove future nesting habitat for tree-nesting birds. Due to the availability of trees in other nearby portions of the installation, impacts to local populations of birds are not anticipated. The Preferred Alternative could improve habitat complexity and breeding habitat for amphibious species. Therefore, the preferred alternative would result in no significant impacts to terrestrial wildlife.

3.3 Summary of Potential Impacts to Resources and Impact Avoidance and Impact Avoidance and Minimization

A summary of the potential impacts associated with the Preferred Alternative and the No Action Alternative are presented in Tables 3-6 and 3-7 respectively. Table 3-7 provides a comprehensive list of all mitigation requirements associated with the Preferred Alternative.

Table 3-1 Summary of Potential Impacts to Resource Areas

Resource Area	*No Action Alternative*	*Preferred Alternative*
Water Resources	No effect.	• No adverse long term water quality impacts; continued nutrient cycling at the wetland. • Continued drainage of the project site. • Potential increase in surface water level from reduced canopy interception and reduced evapo-transpiration, likely partially offset by increase in surface evaporation from canopy cover loss. • No significant impacts to water resources.
Biological Resources	No effect.	• Periodic cutback of new tree growth would permanently alter the vegetation community of 7.6 acres of forest to be more similar to the adjacent scrub shrub community. • No impacts to threatened or endangered species. • Tree cutting would be conducted between the months of September and December during non-nesting times to avoid potential effects to bald eagles protected under the Bald and Golden Eagle Protection Act and other avian species protected under the Migratory Bird Treaty Act. • Leaving the down coarse woody debris in place would ensure the presence of structural complexity and sheltering and foraging habitats for small wetland animals, including amphibians, and minimize soil erosion affecting habitat. • No significant impacts to biological resources.

Table 3-2 Impact Avoidance And Minimization Measures

Measure	*Anticipated Benefit*	*Evaluating Effectiveness*	*Implementing and Monitoring*	*Responsibility*	*Estimated Completion Date*
Preferred Alternative					
Use of Hand Tools and Felling Trees in Place – No Use of Heavy Equipment for Removing Trees from Project Site	Avoidance of sediment and water quality disturbances from heavy equipment	Exclusion of tracked or wheeled vehicles or equipment in wetland	Contract terms and conditions	Navy oversight of contractor	Initial tree cutting activity: December 2016; Recurring for future tree cutting activities
Scheduling Tree Cutting for September - December	Avoidance of impacts to nesting bird species	No tree cutting during nesting season	Contract terms and conditions	Navy oversight of contractor	Initial tree cutting activity: December 2016; Recurring for future tree cutting activities

4 Cumulative Impacts

This section 1) defines cumulative impacts, 2) describes past, present, and reasonably foreseeable future actions relevant to cumulative impacts, 3) analyzes the incremental interaction the Preferred Alternative may have with other actions, and 4) evaluates cumulative impacts potentially resulting from these interactions.

4.1 Definition of Cumulative Impacts

The approach taken in the analysis of cumulative impacts follows the objectives of National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations, and CEQ guidance. Cumulative impacts are defined in 40 CFR section 1508.7.

The impact on the environment that results from the incremental impact of the action when added to the other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

To determine the scope of environmental impact statements, agencies shall consider cumulative actions, which when viewed with other proposed actions have cumulatively significant impacts and should therefore be discussed in the same impact statement.

In addition, CEQ and USEPA have published guidance addressing implementation of cumulative impact analyses—Guidance on the Consideration of Past Actions in Cumulative Effects Analysis (CEQ, 2005) and Consideration of Cumulative Impacts in U.S. Environmental Protection Agency (USEPA) Review of NEPA Documents (USEPA, 1999). CEQ guidance entitled *Considering Cumulative Impacts Under NEPA* (1997) states that cumulative impact analyses should

"…determine the magnitude and significance of the environmental consequences of the proposed action in the context of the cumulative impacts of other past, present, and future actions...identify significant cumulative impacts…[and]…focus on truly meaningful impacts."

Cumulative impacts are most likely to arise when a relationship or synergism exists between a proposed action and other actions expected to occur in a similar location or during a similar time period. Actions overlapping with or in close proximity to the proposed action would be expected to have more potential for a relationship than those more geographically separated. Similarly, relatively concurrent actions would tend to offer a higher potential for cumulative impacts. To identify cumulative impacts, the analysis needs to address the following three fundamental questions.

- Does a relationship exist such that affected resource areas of the proposed action might interact with the affected resource areas of past, present, or reasonably foreseeable actions?
- If one or more of the affected resource areas of the proposed action and another action could be expected to interact, would the proposed action affect or be affected by impacts of the other action?
- If such a relationship exists, then does an assessment reveal any potentially significant impacts not identified when the proposed action is considered alone?

4.2 Scope of Cumulative Impacts Analysis

The scope of the cumulative impacts analysis involves both the geographic extent of the effects and the time frame in which the effects could be expected to occur. For this EA, the study area delimits the geographic extent of the cumulative impacts analysis. In general, the study area will include those areas previously identified in Chapter 3 for the respective resource areas. The time frame for cumulative impacts centers on the timing of the Preferred Alternative.

Another factor influencing the scope of cumulative impacts analysis involves identifying other actions to consider. Beyond determining that the geographic scope and time frame for the actions interrelate to the Preferred Alternative, the analysis employs the measure of "reasonably foreseeable" to include or exclude other actions. For the purposes of this analysis, public documents prepared by federal, state, and local government agencies form the primary sources of information regarding reasonably foreseeable actions. Documents used to identify other actions include EAs, management plans, land use plans, and other planning related studies.

4.3 Past, Present, and Reasonably Foreseeable Actions

This section will focus on past, present, and reasonably foreseeable future projects at and near Runway 25. In determining which projects to include in the cumulative impacts analysis, a preliminary determination was made regarding the past, present, or reasonably foreseeable action. Specifically, using the first fundamental question included in Section 4.1, it was determined if a relationship exists such that the affected resource areas of the Preferred Alternative (included in this EA) might interact with the affected resource area of a past, present, or reasonably foreseeable action. If no such potential relationship exists, the project was not carried forward into the cumulative impacts analysis. In accordance with CEQ guidance (CEQ, 2005), these actions considered but excluded from further cumulative effects analysis are not catalogued here as the intent is to focus the analysis on the meaningful actions relevant to inform decision-making. Projects included in this cumulative impacts analysis are listed below and consist of projects that have occurred or are reasonably expected to occur within ten years before and after present.

4.3.1 Past Actions

Runways 25 and 32 Clear Zone Maintenance. This action entailed the clearing of vegetation from a clear zone established directly east of Runway 25 and adjacent to the project site. Commercially viable timber was removed and sold prior to the area being cleared and grubbed. Vegetation was removed that was impacting instrument approaches to Runway 25. Vegetation affecting Runway 32 was also cleared.

4.3.2 Present and Reasonably Foreseeable Actions

Introduction of the P-8A Multi-Mission Maritime Aircraft into the U.S. This action involves the home basing of 42 P-8A aircraft at NAS Whidbey Island. As a result of the action, the total number of P-8A operations at NAS Whidbey Island at end-state year 2020 will be less than the baseline P-3C operations. The action involves the construction of a new two-story P-8A trainer facility, modification of facilities for additional classroom space, demolition of facilities, and expansion and relocation of hangars, modifications to facilities, construction of shops and storage areas, and renovation of units.

EA-18G Growler Airfield Operations at NAS Whidbey Island. The Navy is proposing to continue to increase the existing VAQ operations at NAS Whidbey Island's Ault Field and Outlying Field Coupeville;

increase Electronic Attack Squadron (VAQ) capabilities and augment the training squadron by adding up to 36 aircraft to support an expanded DoD mission for identifying, tracking, and targeting in a complex electronic warfare (EW) environment; construct and renovate facilities at Ault Field to accommodate additional aircraft; and station additional personnel at, and relocate family members to, NAS Whidbey Island and the surrounding community.

NAS Whidbey Island Integrated Natural Resources Management Plan Update. In December, 2013 the Navy completed an update to the Integrated Natural Resources Management Plan (INRMP) for NAS Whidbey Island that provides for the management of natural resources in support of the Navy's military mission while protecting and enhancing natural resources for multiple uses, sustainable yield, and biological integrity.

4.4 Cumulative Impact Analysis

Where feasible, the cumulative impacts were assessed using quantifiable data; where quantifiable data was not available, a qualitative analysis was undertaken. The analytical methodology presented in Chapter 3, which was used to determine potential impacts to the various resources analyzed in this document, was also used to determine cumulative impacts.

4.4.1 Water Resources

4.4.1.1 Description of Geographic Study Area

The Region of Influence (ROI) for water resources includes the project site and adjacent lands. The ROI is affected by water flows and storm water from upstream at Runway 25.

4.4.1.2 Relevant Past, Present, and Future Actions

The following actions are considered relevant to the cumulative impacts analysis:

- Runways 25 and 32 Clear Zone Maintenance
- Introduction of the P-8A Multi-Mission Maritime Aircraft into the U.S.
- EA-18G Growler Airfield Operations at NAS Whidbey Island
- NAS Whidbey Island Integrated Natural Resources Management Plan Update

4.4.1.3 Cumulative Impact Analysis

Cumulative water resources impacts from past, present, and future actions within the ROI would be less than significant because the actions would not contribute to a reduction in water quality or affect quantity of flows through the watershed. Routine vegetation clearing at the Runway 25 Clear Zone has maintained the site's condition and hydrology has been unaffected. Construction activities associated with the introduction of the P-8A aircraft included the removal of 9.16 acres of herbaceous vegetation and replacement with new impervious surface area generating 3.7 million additional gallons of surface runoff annually. Wet ponds, ditches, swales and underground storm water retention infrastructure ensure the quantity and quality of stormwater discharged to Dugualla Lagoon is maintained at pre-existing levels. Construction activities associated with the introduction of the P-8A aircraft were anticipated to require the fill of approximately 0.8 acre of wetlands at Ault Field and require mitigation; however, the project was modified and wetland impacts were avoided. Information regarding potential

future EA-18G Growler airfield operations and associated construction is not currently available for this cumulative effects analysis. The installation's INRMP update entails measures to ensure no increase in flooding potential, erosion, or pollutants entering water bodies. Therefore, implementation of the Preferred Alternative combined with the past, present, and reasonably foreseeable future projects, would not result in significant impacts within the ROI.

4.4.2 Biological Resources

4.4.2.1 Description of Geographic Study Area

The ROI for biological resources includes the project site and adjacent lands.

4.4.2.2 Relevant Past, Present, and Future Actions

The following actions are considered relevant to the cumulative impacts analysis:

- Runways 25 and 32 Clear Zone Maintenance
- Introduction of the P-8A Multi-Mission Maritime Aircraft into the U.S.
- EA-18G Growler Airfield Operations at NAS Whidbey Island
- NAS Whidbey Island Integrated Natural Resources Management Plan Update

4.4.2.3 Cumulative Impact Analysis

The limited impacts to biological resources, including the removal of herbaceous vegetation, would not remove habitat used extensively by Endangered Species Act -listed species in the project areas. Vegetation clearing at the Runway 25 Clear Zone maintained the site's condition; mobile wildlife temporarily flushed from the site during clearing activities but repopulated. No threatened and endangered species were impacted. Information regarding potential future EA-18G Growler airfield operations and associated construction is not currently available for this cumulative effects analysis. The loss of approximately 9.16 acres of herbaceous vegetation at NAS Whidbey Island associated with the introduction of P8-A aircraft is expected to have caused the direct mortality of less mobile species, including small mammals, reptiles, and amphibians. Permanent migration of species to other areas with suitable habitat has indirectly resulted in a decrease in the number of wildlife species in the area. However, the overall loss of wildlife species is undetectable at a population level, given the relatively large amount of suitable habitat that would remain near the proposed facilities. The affected vegetation communities were not considered unique or regionally significant. The installation's revised INRMP has beneficial impacts to flora and fauna through recommendations to increase wildlife habitat and conserve and protect threatened and endangered species. The proposed tree cutting is consistent with the management recommendations in the INRMP by removing vegetation during the non-nesting season to avoid impacts to avian species. Consequently, the Preferred Alternative when considered with other past, present, and future actions could cumulatively impact biological resources, but it would not be expected to have a significant cumulative impact.

5 Other Considerations Required by NEPA

5.1 Consistency with Other Federal, State, and Local Laws, Plans, Policies, and Regulations

In accordance with 40 CFR section 1502.16(c), analysis of environmental consequences shall include discussion of possible conflicts between the Proposed Action and the objectives of federal, regional, state and local land use plans, policies, and controls. Table 5-1 identifies the principal federal and state laws and regulations that are applicable to the Proposed Action, and describes briefly how compliance with these laws and regulations would be accomplished.

Table 5-1 Principal Federal and State Laws Applicable to the Preferred Alternative

Federal, State, Local, and Regional Land Use Plans, Policies, and Controls	***Status of Compliance***
National Environmental Policy Act (NEPA) (42 U.S.C. section 4321 et seq.); Council on Environmental Quality (CEQ) NEPA implementing regulations (40 Code of Regulations [CFR] parts 1500-1508; Navy procedures for Implementing NEPA ((32 CFR part 775 and Chief of Naval Operations Instruction [OPNAVINST] 5090.1D)	Preparation of this EA has been conducted in compliance with NEPA and in accordance with CEQ regulations and the Navy's NEPA procedures.
Clean Air Act (42 United States Code [U.S.C.] section 7401 et seq.)	Island County is designated as an attainment area for all criteria pollutants and the General Conformity Rule does not apply. Air emissions would result from temporary mobile sources and would not be evaluated with respect to Prevention of Significant Deterioration, nor would any new stationary emission sources be constructed. Therefore, New Sources Review and Prevention of Significant Deterioration requirements do not apply.
Clean Water Act (CWA; 33 U.S.C. section 1251 et seq.)	The Preferred Alternative would not result in the discharge of fill material into a water of the U.S. or dredging. Therefore, a CWA Section 404 permit is not required.
National Historic Preservation Act (Section 106, 16 U.S.C. section 470 et seq.)	The Navy has consulted with the Washington State Historic Preservation Officer (SHPO) and SHPO concurred that the proposed tree cutting would have no adverse effects to historic resources.
Endangered Species Act (ESA; 16 U.S.C. section 1531 et seq.)	No species listed as threatened or endangered have been identified or are expected at the project site. Therefore, there would be no effect to threatened or endangered species listed under the ESA.
Migratory Bird Treaty Act (MBTA; 16 U.S.C. sections 703-712)	Bird species may flush from the project site during tree cutting activities. However, all tree cutting activities would occur between the months of September and December during the non-nesting season. Therefore, there is no anticipated take of birds protected under MBTA.

Table 5-1 Principal Federal and State Laws Applicable to the Preferred Alternative

Federal, State, Local, and Regional Land Use Plans, Policies, and Controls	*Status of Compliance*
Bald and Golden Eagle Protection Act (16 U.S.C. section 668-668d)	No bald or golden eagle nests are known to be present in the project site. A raptor nest identified during April 20, 2015 field survey is thought to be that of a red-tail hawk. All tree cutting activities would occur between the months of September and December during the non-nesting season. Therefore, there is no anticipated take of eagles.
Executive Order 11988, Floodplain Management	The proposed tree cutting would not occur in a floodplain, nor would it support floodplain development.
Executive Order 13175, Consultation and Coordination with Indian Tribal Governments	Consultation was not required as the proposed action does not affect tribal treaty rights or resources.

5.2 Irreversible or Irretrievable Commitments of Resources

Resources that are irreversibly or irretrievably committed to a project are those that are used on a long-term or permanent basis. This includes the use of non-renewable resources such as metal and fuel, and natural or cultural resources. These resources are irretrievable in that they would be used for this project when they could have been used for other purposes. Human labor is also considered an irretrievable resource. Another impact that falls under this category is the unavoidable destruction of natural resources that could limit the range of potential uses of that particular environment.

Implementation of the Preferred Alternative would involve human labor; the consumption of fuel, oil, and lubricants for hand equipment; and conversion of forested wetland habitat into a scrub shrub wetland. The wetland would continue to provide habitat although it is in a changed condition. Implementation of the Preferred Alternative would not result in significant irreversible or irretrievable commitment of resources.

5.3 Unavoidable Adverse Impacts

This EA has determined that the preferred alternative would not result in any significant impacts. Implementing the alternatives would result in the unavoidable environmental impact by altering the vegetation community of the established wetland at the site via tree cutting.

5.4 Relationship between Short-Term Use of the Environment and Long-Term Productivity

NEPA requires an analysis of the relationship between a project's short-term impacts on the environment and the effects that these impacts may have on the maintenance and enhancement of the long-term productivity of the affected environment. Impacts that narrow the range of beneficial uses of the environment are of particular concern. This refers to the possibility that choosing one development site reduces future flexibility in pursuing other options, or that using a parcel of land or other resources often eliminates the possibility of other uses at that site.

In the short-term, effects to the human environment with implementation of the Preferred Alternative would primarily relate to the tree cutting activity itself. The noise environment would be impacted in the short-term. In the long-term, the cutting of trees would facilitate the continued use of Runway 25 and is consistent with the runway's established clear zone. The cutting of trees would also alter the vegetation community and corresponding habitat of the wetland. However, tree felling would not significantly impact the long-term natural resource productivity of the area and the wetland would continue to provide habitat albeit in a different form. The Preferred Alternative would not result in impacts that would significantly reduce environmental productivity or permanently narrow the range of beneficial uses of the environment.

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6 References

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7 List of Preparers

This EA was prepared by the Navy.

Wes Miksa, Environmental Planner, NAVFAC NW
M.P.A., Earth Systems Science, Policy, and Management, Columbia University
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Responsible for: EA

Terri Jones, Regional Forester, NAVFAC NW
M.F.R., Forest Resource Management, University of Washington
Registered Professional Forester (RPF)
Years of Experience (Forestry): 36
Responsible for: Forestry

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Appendix A
National Historic Preservation Act Section 106 Documentation

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DEPARTMENT OF THE NAVY
NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVENUE
OAK HARBOR, WASHINGTON 98278-5000

5090
Ser N44/146
January 19, 2016

Allyson Brooks, PhD
State Historic Preservation Officer
Washington Department of Archaeology and Historic Preservation
1063 South Capital Way, Suite 106
P.O. Box 48343
Olympia, WA 98504-8343

Dear Dr. Brooks:

SUBJECT: REQUEST FOR SECTION 106 CONSULTATION ON THE DEFINITION OF THE AREA OF POTENTIAL FOR THE PROPOSAL TO REMOVE TREES AND VEGETATION EAST OF RUNWAY 25, AULT FIELD, NAVAL AIR STATION WHIDBEY ISLAND, ISLAND COUNTY, WASHINGTON

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations 36 CFR 800, Naval Air Station Whidbey Island (NASWI) is initiating consultation and asks for your concurrence on the definition of the Area of Potential Effect for the proposal to remove trees and vegetation east of Runway 25, Ault Field, NASWI, Island County, Washington (Enclosures 1 and 2).

In order to increase visibility and safety, the Navy proposes to clear existing trees and vegetation in 9.5 acres east of Runway 25 (Enclosure 3). Trees will be cut and fell in place. They will not be removed from the site and no grinding will be required. Branches and brush will be cleared no more than four inches above ground level and chipped. Chips will be left in place. No ground disturbance will occur.

The Area of Potential Effect (APE) for this undertaking is approximately 9.5 acres, including the location of the trees to be removed (Enclosure 4). No ground disturbance will occur, as the trees will be left in place and vegetation will be cut at ground level.

The Navy understands that the APE and its surrounding location may have cultural importance and significance to members of the traditional cultural groups of Whidbey Island. In order to identify possible religious or cultural significance to affected tribes, the Navy has initiated consultation with the Swinomish Indian Tribal Community, the Samish Indian Nation, the Upper Skagit Indian Tribe, and the Stillaguamish Tribe of Indians. Results of tribal consultation will be provided to your office.

The Navy requests your concurrence with the definition of the Area of Potential Effect for the proposed undertaking. If you require additional information, please contact Tracy Schwartz, Cultural Resource Contract Support, at (360) 257-5742 or tracy.schwartz.ctr@navy.mil.

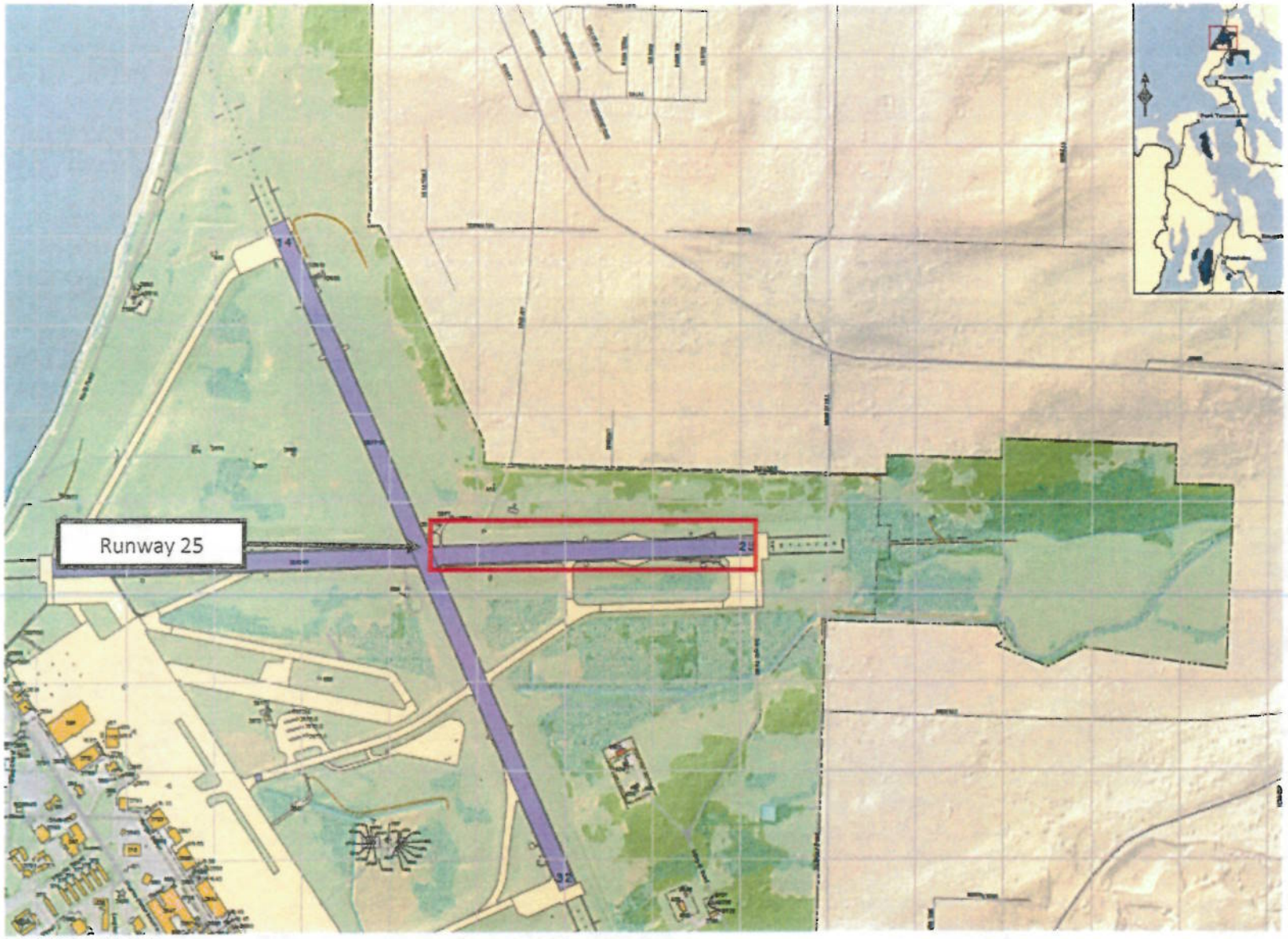
Sincerely,

Melanie Bengtson

MELANIE BENGTSON
NASWI Installation Environmental Program Director
By Direction of the Commanding Officer

Enclosures:
1. Site Location
2. Location of Runways 25
3. Proposed Location of Trees to be Removed
4. Area of Potential Effect

ENCLOSURE 1.



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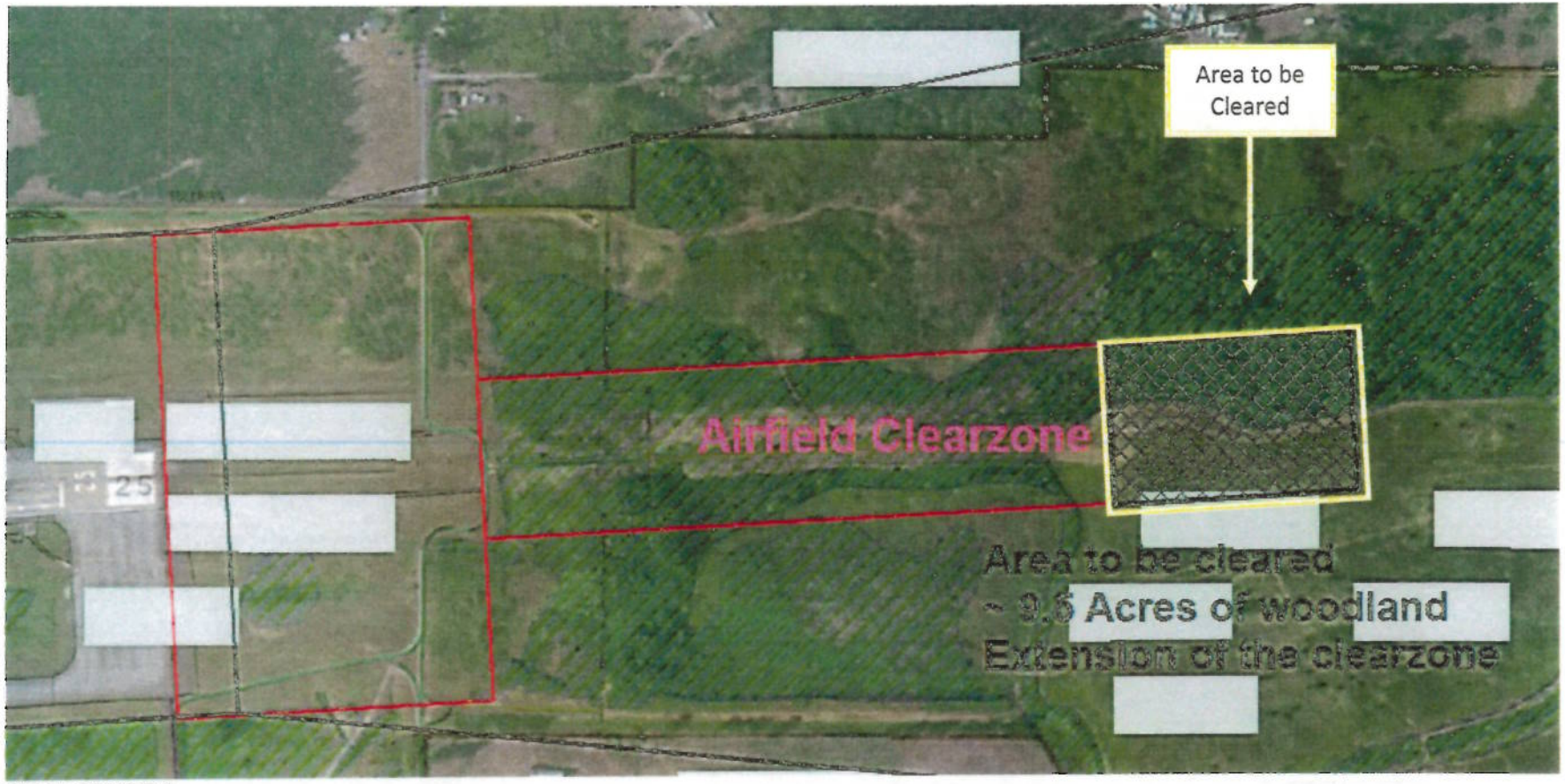
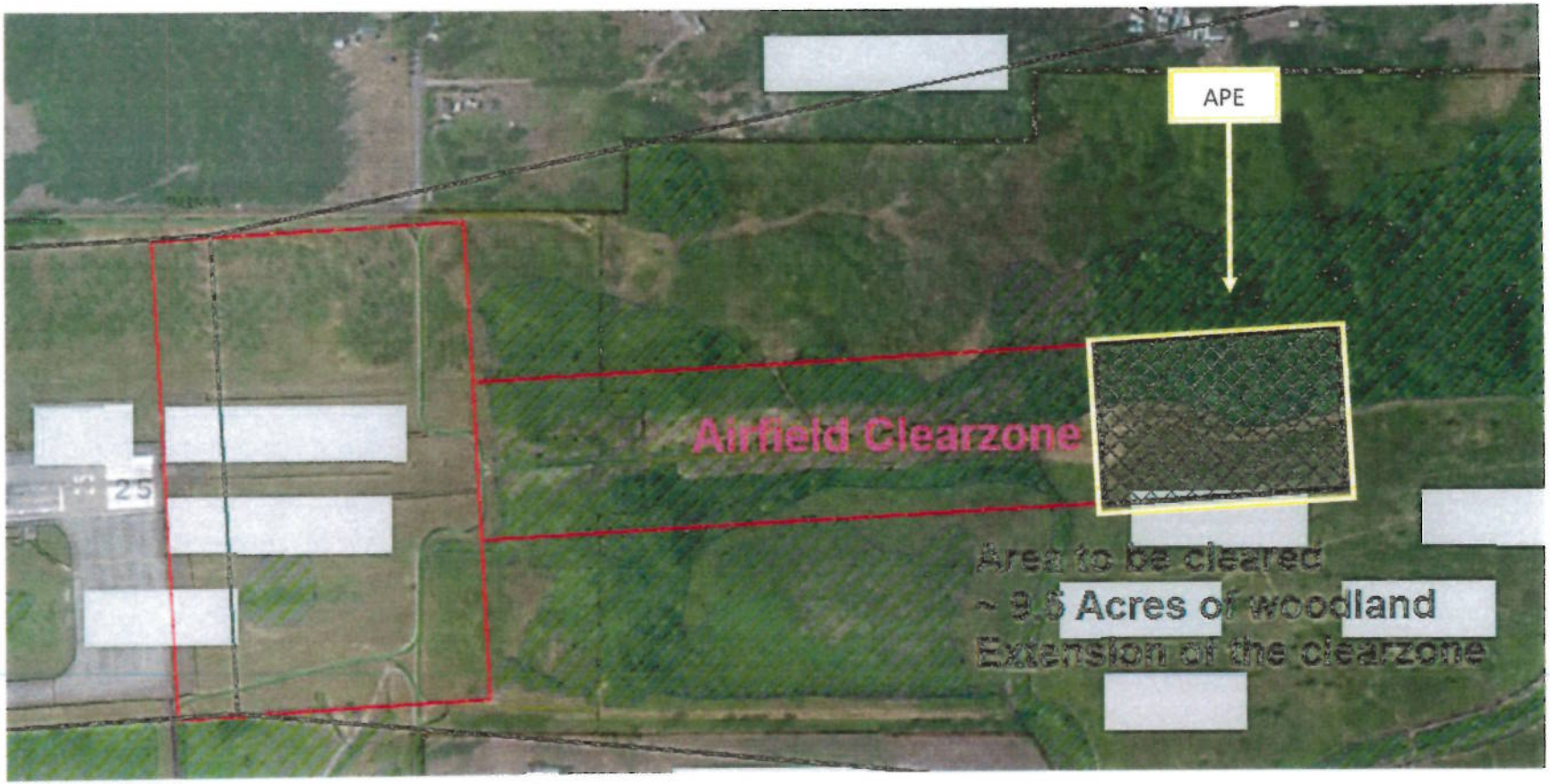

Area to be Cleared
Airfield Clearzone
25
Area to be cleared
~ 9.5 Acres of woodland
Extension of the clearzone

ENCLOSURE 3.


APE
Airfield Clearzone
25
Area to be cleared
~ 9.5 Acres of woodland
Extension of the clearzone

ENCLOSURE 4.

Allyson Brooks Ph.D., Director
State Historic Preservation Officer

January 25, 2016

Ms. Melanie Bengtson
Naval Air Station Whidbey Island
Department of the Navy
3730 North Charles Porter Avenue
Oak Harbor, Washington 98278-5000

Re: Trees & Vegetation Removal east of Runway 25 Project
Log No.: 2016-01-00202-USN

Dear Ms. Bengtson:

Thank you for contacting our department. We have reviewed the materials you provided for the proposed *Trees & Vegetation Removal east of Runway 25 Project* at Ault Field, Naval Air Station Whidbey Island, Whidbey Island, Island County, Washington.

We concur with your identification of the proposed Area of Potential Effect (APE). We look forward to receiving the results of your consultation with the concerned tribes, professional cultural resources review, and determination of effect.

We would also appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4).

These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer in compliance with the Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations 36CFR800.4.

Should additional information become available, our assessment may be revised.

Sincerely,

Robert G. Whitlam, Ph.D.
State Archaeologist
(360) 890-2615
email: *rob.whitlam@dahp.wa.gov*

DEPARTMENT OF THE NAVY
NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVENUE
OAK HARBOR, WASHINGTON 98278-5000

5090
Ser N44/274
January 26, 2016

Allyson Brooks, PhD
State Historic Preservation Officer
Washington Department of Archaeology and Historic Preservation
1063 South Capital Way, Suite 106
P.O. Box 48343
Olympia, WA 98504-8343

Dear Dr. Brooks:

SUBJECT: LOG NO. 2016-01-00202-USN: REQUEST FOR SECTION 106 CONSULTATION ON THE FINDING OF NO HISTORIC PROPERTIES AFFECTED FOR THE PROPOSAL TO REMOVE TREES AND VEGETATION EAST OF RUNWAY 25, AULT FIELD, NAVAL AIR STATION WHIDBEY ISLAND, ISLAND COUNTY, WASHINGTON

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations 36 CFR 800, Naval Air Station Whidbey Island (NASWI) is continuing consultation and asks for your concurrence on the finding of No Historic Properties Affected for the proposal to remove trees and vegetation east of Runway 25, Ault Field, NASWI, Island County, Washington (Enclosures 1 and 2). The Washington State Historic Preservation Officer (SHPO) concurred with the definition of the Area of Potential Effect on 25 January 2016 (Log No. 2016-01-00202-USN).

In order to increase visibility and safety, the Navy proposes to clear existing trees and vegetation in 9.5 acres east of Runway 25 (Enclosure 3). Trees will be cut and fell in place. They will not be removed from the site and no grinding will be required. Branches and brush will be cleared no more than four inches above ground level and chipped. Chips will be left in place. No ground disturbance will occur.

The Area of Potential Effect (APE) for this undertaking is approximately 9.5 acres, including the location of the trees to be removed (Enclosure 4). No ground disturbance will occur, as the trees will be left in place and vegetation will be cut at ground level. The Washington SHPO concurred with this definition.

An environmental and cultural literature review was conducted within 100 meters of the APE. Three archaeological surveys have been conducted and one archaeological site was located within 100 meters of the APE (Table 1). 45IS324 was identified by Stell in 2013, and is a highly disturbed historic refuse scatter. It is 100 meters west of the APE (Enclosure 5). Stell observed glass, whiteware, and porcelain, but all within secondary context, at the site. Site 45IS324 has been determined not eligible for listing in the National Register of Historic Places (NRHP), though concurrence has not been sought from the Washington SHPO. Site 45IS324 will not be impacted by the proposed removal of trees because no ground disturbance will occur. No historic viewsheds will be impacted by the undertaking.

5090
Ser N44/274
January 26, 2016

Survey Author	Date	Description	Finding
Dames and Moore	1994	Reconnaissance archaeological survey of northern portion of the APE.	Located no archaeological sites or isolates within 100 meters of the APE.
TEC and EDAW	2008	Survey and subsurface testing.	Located no archaeological sites or isolates within 100 meters of the APE.
Stell	2013	Archaeological inventory of northern portion of the APE.	Located site 45IS324 100 meters west of the APE.

The Navy has found that this undertaking will have No Historic Properties Affected because no archaeological resources are known to exist within the APE and no historic resources will be impacted. Although it is highly unlikely that archaeological resources will be found, there is always the potential for an unanticipated discovery. Therefore, a copy of the inadvertent discovery plan will be provided to the contractor alerting them to cease work and notify the Cultural Resource Program Manager if a discovery is made.

The Navy understands that the APE and its surrounding location may have cultural importance and significance to members of the traditional cultural groups of Whidbey Island. In order to identify possible religious or cultural significance to affected tribes, the Navy has initiated consultation with the Swinomish Indian Tribal Community, the Samish Indian Nation, the Upper Skagit Indian Tribe, and the Stillaguamish Tribe of Indians. Results of tribal consultation will be provided to your office.

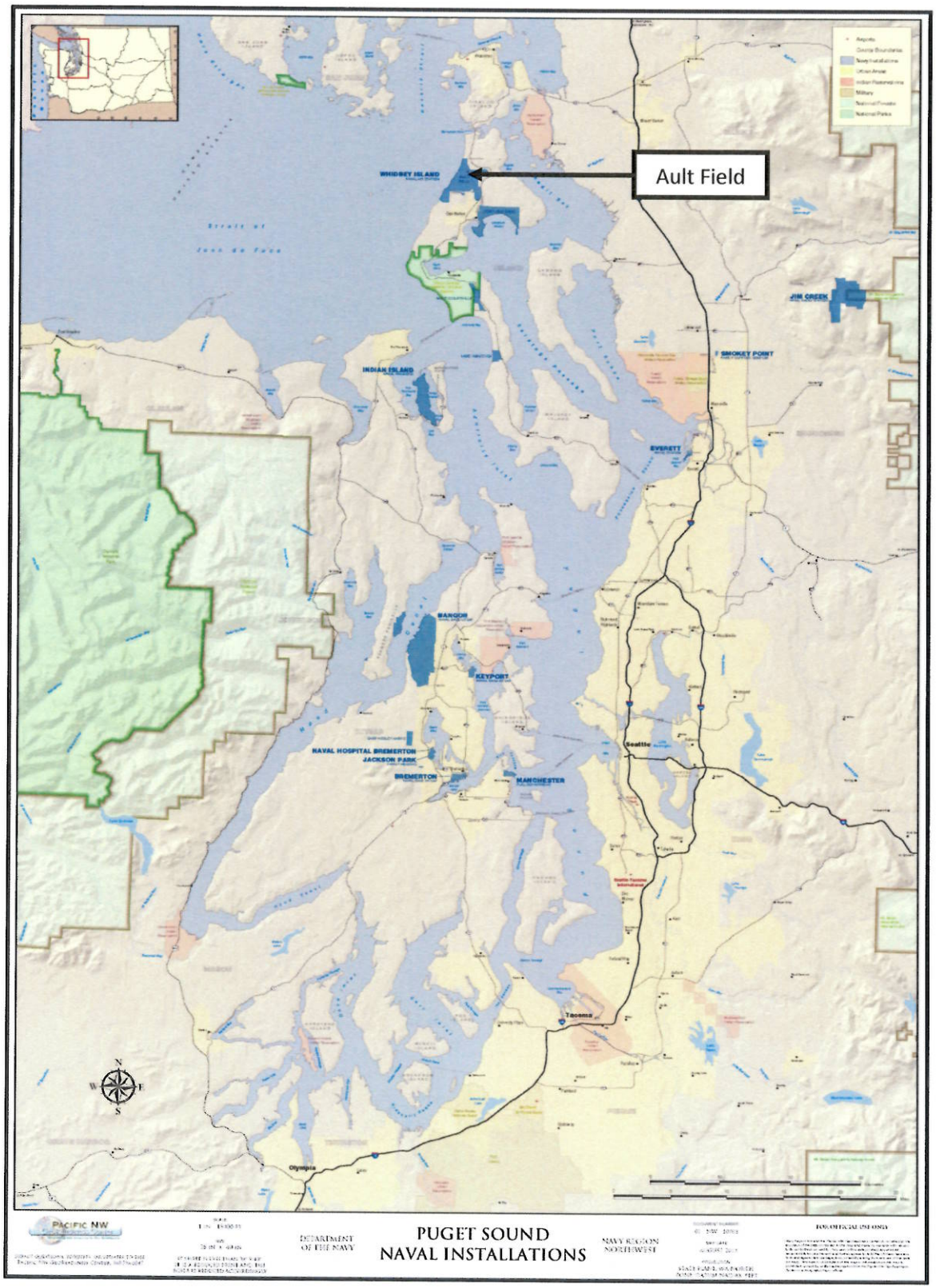
The Navy requests your concurrence with the finding of No Historic Properties Affected for the proposed undertaking. If you require additional information, please contact Tracy Schwartz, Cultural Resource Contract Support, at (360) 257-5742 or tracy.schwartz.ctr@navy.mil.

Sincerely,

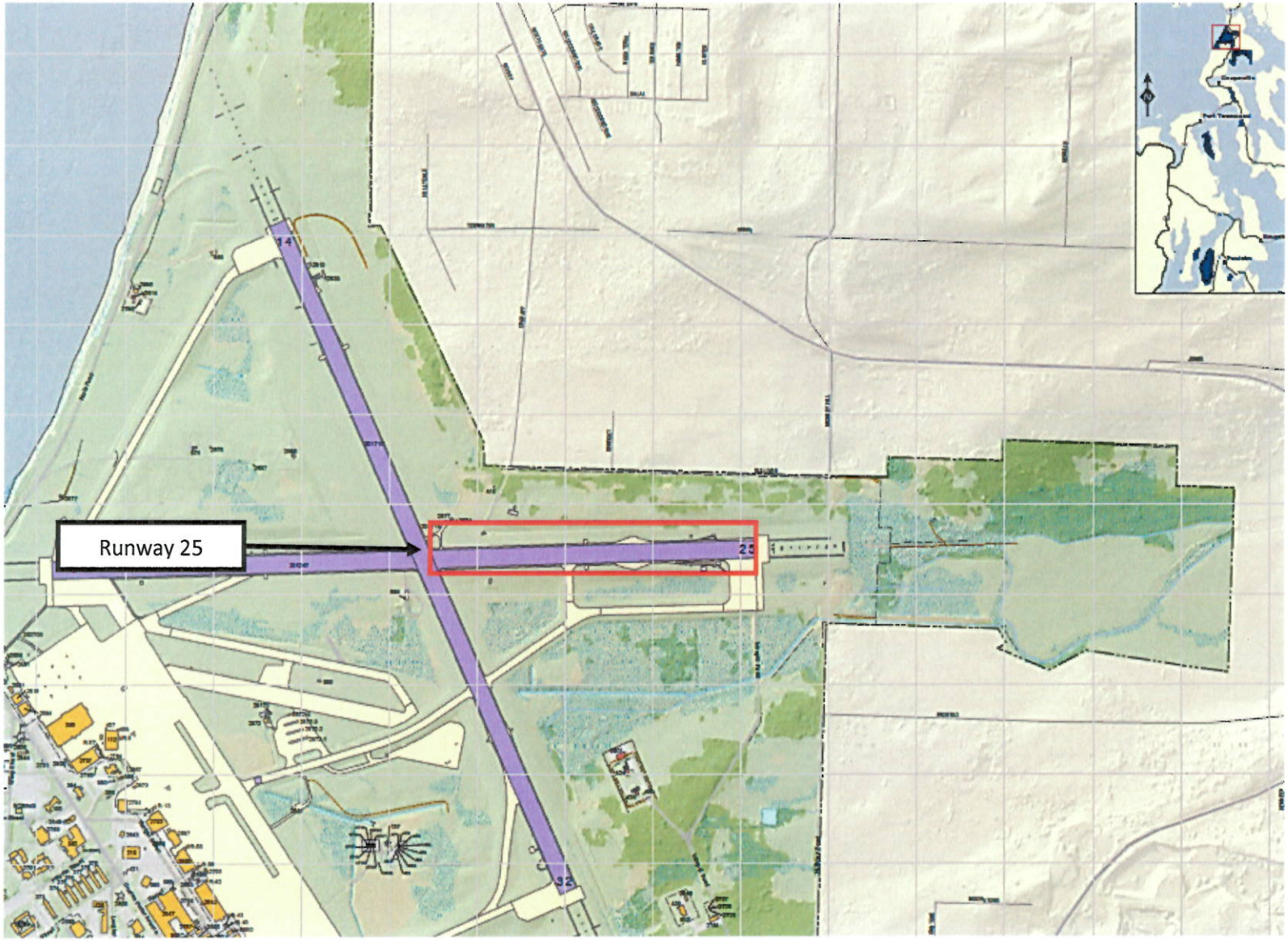
Melanie Bengtson

MELANIE BENGTSON
NASWI Installation Environmental Program Director
By Direction of the Commanding Officer

Enclosures:
1. Site Location
2. Location of Runways 25
3. Proposed Location of Trees to be Removed
4. Area of Potential Effect
5. APE on New WISAARD


Ault Field
WHIDBEY ISLAND
INDIAN ISLAND
JIM CREEK
SMOKEY POINT
EVERETT
BANGOR
KEYPORT
NAVAL HOSPITAL BREMERTON
JACKSON PARK
BREMERTON
MANCHESTER
Seattle
Tacoma
Olympia
PACIFIC NW
DEPARTMENT OF THE NAVY
PUGET SOUND NAVAL INSTALLATIONS
NAVY REGION NORTHWEST

ENCLOSURE 1.



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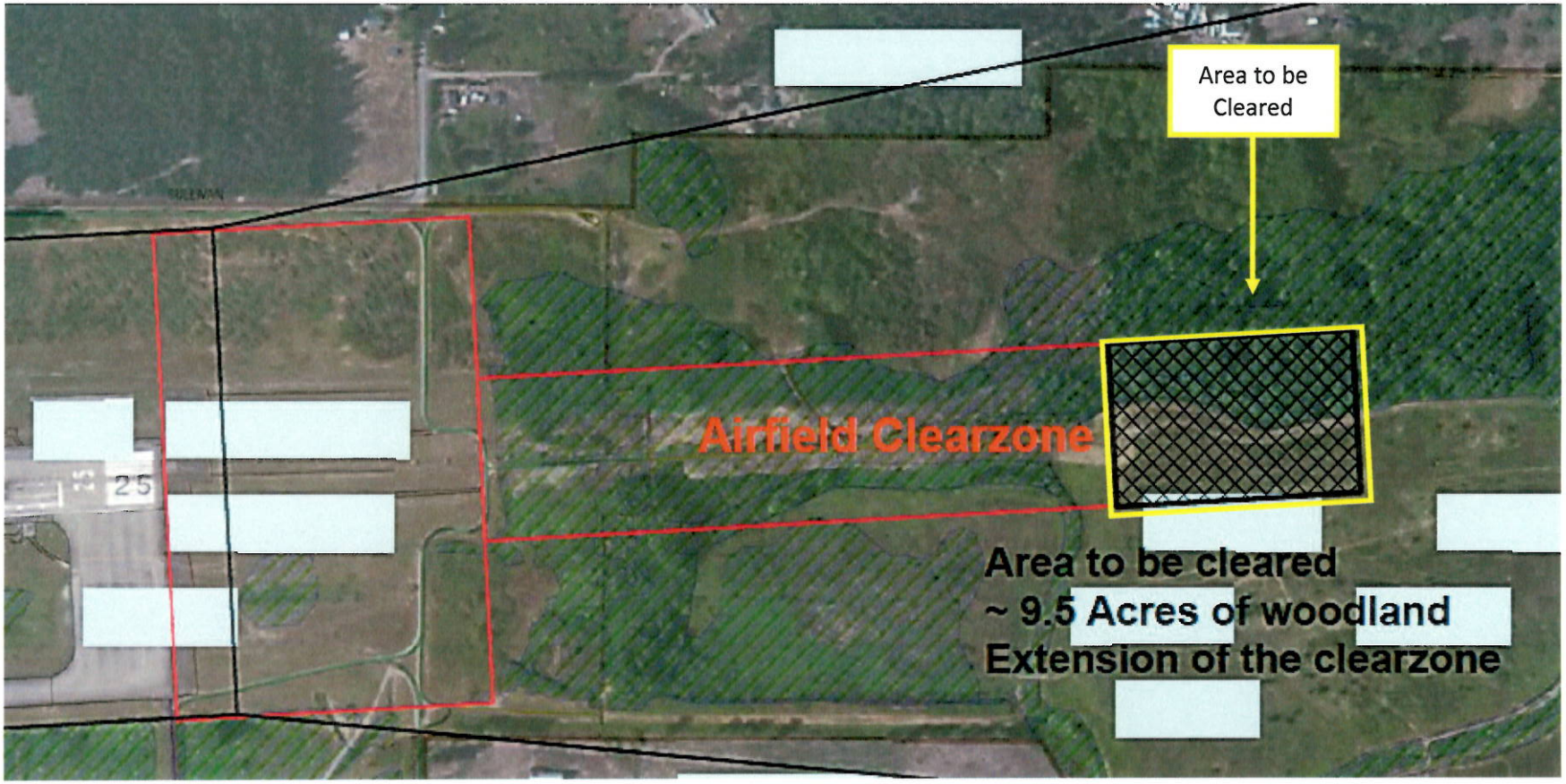
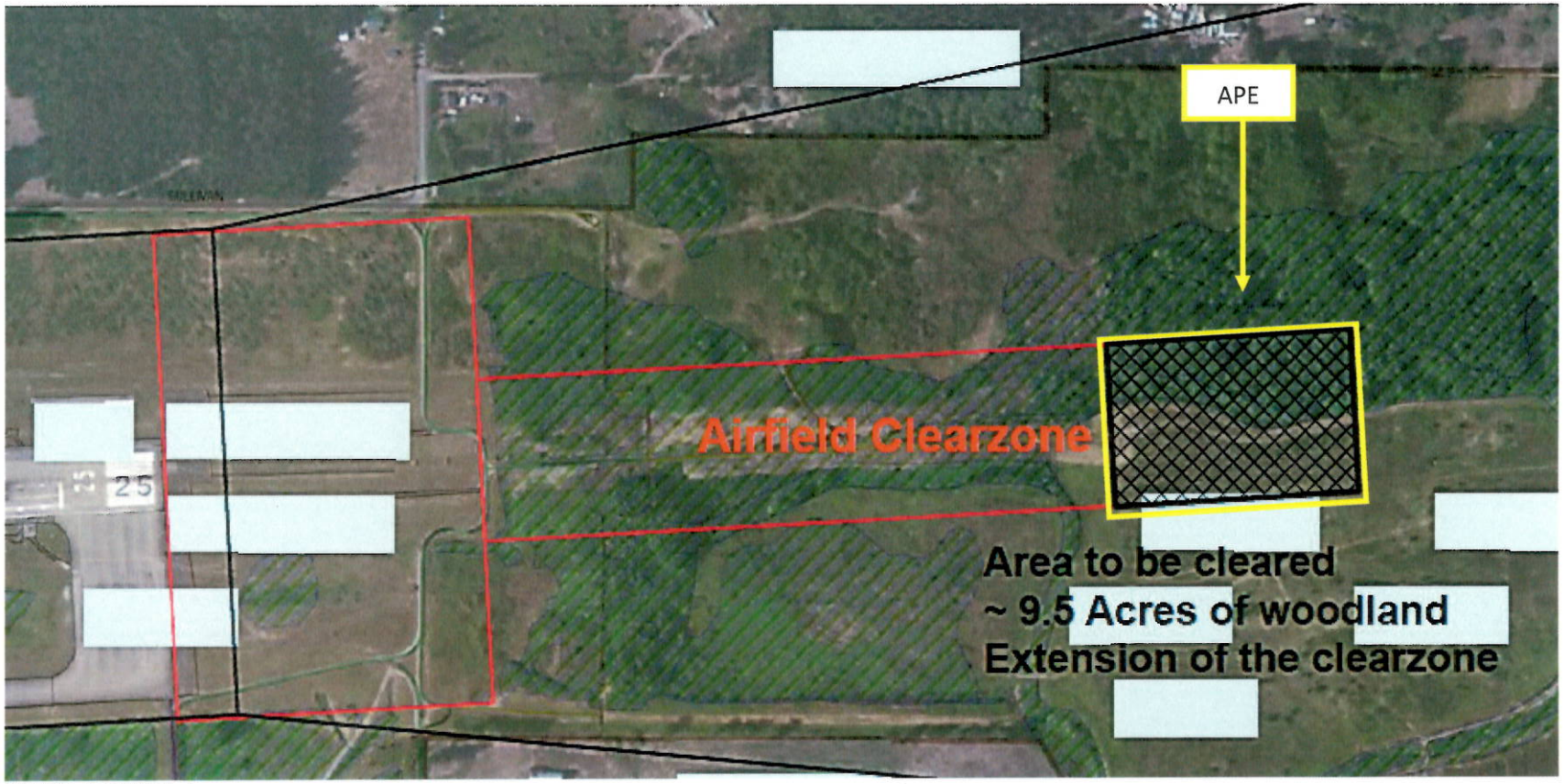

Area to be Cleared
Airfield Clearzone
Area to be cleared
~ 9.5 Acres of woodland
Extension of the clearzone

ENCLOSURE 3.


APE
Airfield Clearzone
Area to be cleared
~ 9.5 Acres of woodland
Extension of the clearzone

ENCLOSURE 4.

Allyson Brooks Ph.D., Director
State Historic Preservation Officer

February 1, 2016

Ms. Melanie Bengtson
Naval Air Station Whidbey Island
3730 North Charles Porter Avenue
Oak Harbor, Washington 98278-5000

Re: Tree & Vegetation Removal East of Runway 25 Project
Log No: 2016-01-00202-USN

Dear Ms. Bengtson:

Thank you for contacting our department. We reviewed the materials you provided for the proposed *Tree & Vegetation Removal East of Runway 25 Project*, Ault Field, Naval Air Station Whidbey Island, Island County, Washington.

We concur with your Determination of No Historic Properties Affected.

We would appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4).

In the event that archaeological or historic materials are discovered during project activities, work in the immediate vicinity must stop, the area secured, and the concerned tribes and this department notified.

These comments are based on the information available at the time of this review and on the behalf of the State Historic Preservation Officer in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36CFR800. Should additional information become available, our assessment may be revised. Thank you for the opportunity to comment and a copy of these comments should be included in subsequent environmental documents.

Sincerely,

Robert G. Whitlam, Ph.D.
State Archaeologist
(360) 890-2615
email: *rob.whitlam@dahp.wa.gov*