

**DEPARTMENT OF DEFENSE
UNITED STATES ARMY**

**FINDING OF NO PRACTICABLE ALTERNATIVE CONSTRUCTION OF A
MILITARY FAMILY HOUSING DEVELOPMENT**

U. S. ARMY GARRISON-MIAMI, DORAL FLORIDA

1.0 Introduction

U.S. Army Garrison-Miami (USAG-Miami) is in Doral, Florida in Miami-Dade County, approximately 3 miles west of Miami International Airport. A major tenant of USAG-Miami in Doral is U.S. Southern Command (SOUTHCOM). USAG-Miami also supports SOUTHCOM's subordinate commands, U.S. Marine Forces South and Special Operations Command South, in Homestead, Florida as well as various other organizations. SOUTHCOM is the unified command responsible for force protection of U.S. military resources in Central America, South America, and the Caribbean (except U.S. commonwealths, territories, and possessions). SOUTHCOM's area of responsibility encompasses 31 countries and 16 dependencies and areas of special sovereignty. The SOUTHCOM mission includes countering transnational crime, counterterrorism, building partner capacity, contingency response, and detainee operations (SOUTHCOM, 2019). U.S. Marine Forces, South is the Marine Corps component command for SOUTHCOM. Special Operations Command South provides contingency response force and plans, prepares for, and conducts special operations in support of SOUTHCOM. The number of permanent party military personnel at USAG-Miami is 1,250 and is estimated to be 1,242 in 2025. Approximately 75 percent of the USAG-Miami military population works in Doral, Florida (USAG-Miami, 2018). There is no military housing on the USAG-Miami cantonment. This creates significant financial, security, and quality of life issues for service members and adversely affects mission readiness (USAG-Miami, 2018).

2.0 Notice of Floodplain Involvement

EO 11988 requires federal agencies to determine whether a proposed action would occur within a floodplain and to avoid floodplains to the maximum extent possible when there is a practicable alternative. The 100-year floodplain is defined as an area adjacent to a water body that has a 1 percent or greater chance of inundation in any given year. The Army has determined that the infrastructure proposed in the construction of the military family housing would be built in a flood plain. The Base Flood Elevation for the proposed project area is 6 feet amsl (FEMA, 2009) which means the parcel, at the existing elevation of 5 feet amsl, is prone to flooding to a depth of 1 foot. According to the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map (FIRM), the proposed project area is located within a Special Flood Hazard Area (Zone AH [flood depths of 1 to 3 feet typically occur from ponding and not within a floodplain]) (FEMA, 2009). A Special Flood Hazard Area is the area subject to inundation by a flood that has a 1 percent or greater chance of being equaled or exceeded during any given year.

Publication of a Notice of Availability for this Draft Finding of No Practicable Alternative (FONPA) in the *Miami Herald* commences a 30-day public comment period for this FONPA.

3.0 Description of the Proposed Action and Discussion of Alternatives:

The Proposed Action is for USAG-Miami to acquire FAA land south of NW 33rd Street across from the SOUTHCOM headquarters in Doral, Florida and construct a military housing development on the property. The property houses a large FAA radar tower and associated support buildings near its center. No housing or other vertical structures would be constructed within the 853-foot radius FAA established antenna standoff area to avoid interference with

operation of the radar system; however, non-vertical assets such as stormwater retention infrastructure, roads, or parking may be located within this radius. Proposed structures between the 853-foot radius and the 1,019-foot radius would be compliant with FAA requirements for those designated areas and would not interfere with operation of the radar. The Proposed Action would meet most of the USAG-Miami 2020 military housing shortfalls described in the Purpose and Need. In order to give an idea of the selection criteria, the purpose and need is provided as follows:

The purpose of the Proposed Action is to provide military housing to meet USAG-Miami's housing requirement. This includes housing for 50 Key and Essential Family Units and 120 Unaccompanied Enlisted Units within 5 miles/15 minutes peak traffic commute from SOUTHCOM headquarters in Doral, Florida. This ensures essential personnel can walk to the installation and enables mission readiness. The remainder of the housing requirement (120 Family Units) should be within 20 miles/60 minutes peak traffic commute from SOUTHCOM headquarters. The need for the Proposed Action is to minimize mission interruption during emergency conditions and to improve security and readiness, increase affordability, and provide cohesion for families and staff. There is no military housing on the USAG-Miami cantonment and no space within the cantonment to construct military housing; therefore, service members are forced to seek affordable housing within the local economy. The absence of housing on the installation presents a mission sustainment problem because essential personnel may be unable to reach the SOUTHCOM facility during an emergency to maintain operations because of road closures and traffic, and it makes it difficult to provide required security and protection for the combatant commander and key and essential (See EA/FONSI Construction of Military Family Housing USAG Miami, attached) and mission essential personnel. Moreover, there is a documented shortfall of affordable housing around USAG-Miami (*Id.*).21).

3.1 Alternatives Considered and Dismissed

USAG-Miami developed the Proposed Action and alternatives based on consideration of mission requirements, security requirements, environmental constraints, and mission efficiency. Five alternatives for meeting housing shortfalls at USAG-Miami were evaluated in a cost-benefit analysis; three of them were dismissed (USAG-Miami, 2018). Alternatives dismissed from further consideration are described below.

3.1.1 Privatized Housing on FAA Parcel

This Alternative was dismissed from consideration in the Draft EA. However, during the public review period the Army determined that it was a feasible alternative and that it would be combined with the MILCON Alternative in this Final EA due to the environmental consequences being the same.

Under this alternative, privatized housing would be constructed on the 160-acre FAA parcel. The Residential Communities Initiative (RCI), the most common form of housing privatization, has been widely used on military bases; however, the authority to use this model has recently expired. If the authority could be restarted, this model leverages the Basic Allowance for Housing to access the private capital market to fund construction and maintenance without congressionally appropriated funds. This alternative also requires a new privatization authority. Because of limited scope and financial uncertainties, this alternative might be unattractive to an RCI partner.

3.1.2 MILCON Family Housing Project near Homestead Air Reserve Base

Under this alternative, MILCON funds would be used to construct a housing development on other real property near Homestead Air Reserve Base, located approximately 26 miles south of USAG-Miami. The land of the former Homestead Air Force Base was transferred to the Air Force Reserve and to Miami-Dade County following closure of the Air Force Base. USAG-Miami

currently manages the operational facilities of Special Operations Command South on an 84.2-acre leased site owned by Miami-Dade County. USAG-Miami was directed by the Army to evaluate building on land owned by Miami-Dade County. The cost to acquire land, if available, would be an estimated \$10,147,966.

Constructing housing in Homestead would exacerbate rather than solve most of the issues SOUTHCOM is trying to resolve. Availability of suitable land for this project is assumed; however, no suitable contiguous tracts of land are available that meet the requirement. Furthermore, the drive time between the two locations averages between 40 and 45 minutes without traffic issues, and all major routes require tolls of approximately \$5 per day for the drive. K&E personnel could not be assigned in Doral and housed in Homestead. Homestead suffers from a lack of acceptable childcare, schools, and healthcare (USAG-Miami, 2018). As a result of the aforementioned factors, Alternative 5 was dismissed from further consideration.

3.1.3 Expanded Leasing (in Doral Only)

The last alternative considered but not carried forward is similar to the No Action Alternative but would require the housing office to lease, rent, or buy real estate in the corporate limits of Doral only and assign it to personnel. This variation on the No Action Alternative limits many of the negative aspects of the No Action Alternative. Additional housing office personnel would be required to verify that homes meet Army requirements and to maintain the pool of residences. This alternative has the highest cost and does not improve service member security. A large increase in the Directorate of Public Works Housing Office staff would be required and service members would face high upfront costs in the Doral rental market. Additionally, personnel could encounter traffic and road closures that could delay their ability to quickly reach the installation in an emergency. This alternative was dismissed from further consideration because it does not meet the purpose and need of the Proposed Action.

3.3 Alternatives Subject to Further Analysis

Based on the selection criteria, the only action alternative selected for a more detailed analysis was the Preferred Alternative. The Army also analyzed a No Action Alternative, as required by Council on Environmental Quality regulations.

3.3.1 No Action Alternative

Under the No Action Alternative, USAG-Miami would not acquire the FAA parcel directly adjacent to the SOUTHCOM headquarters in Doral, Florida and would not construct a military housing development. Service members would continue to search for affordable housing in the local economy and be scattered across the city and county. This would continue to create an undue financial burden on many service members as they seek suitable quarters and would continue to adversely impact mission readiness for USAG-Miami and SOUTHCOM. Essential personnel would continue to be unable to quickly reach the SOUTHCOM headquarters facility to maintain operations during emergencies as a result of possible road closures and traffic. Higher-level personnel living offsite would not be provided with required additional security for personal protection.

Under the No Action Alternative, revisiting the option of acquiring the FAA parcel a few years from now may not be a possibility. FAA is systematically updating traffic control systems, and the large satellite dish at the FAA parcel may become obsolete. If FAA opts to dispose of this property and the Army is not in the position to acquire it, an opportunity to enhance the SOUTHCOM mission and improve service members' quality of life would be lost.

The No Action Alternative would not meet the purpose and need for the Proposed Action. The No Action Alternative is included for analysis as required by NEPA and serves as reference for comparison of potential effects of the Proposed Action.

3.3.2 MILCON/Privatization Alternative (Preferred Alternative)

In the MILCON/Privatization Alternative, USAG-Miami would construct and operate a housing development as described in the Proposed Action (Section 2.1) on up to 75 acres of the property (Figure 2-1). Funding used to acquire some or all of the approximately 160-acre FAA parcel and pay for the construction, operation, management, and maintenance of service member housing would be either through congressionally approved funds or through privatized development. Under this alternative, no building structures would be built on the central portion (52.4 acres) of the parcel as not to interfere with radar tower operations; however, non-vertical assets such as stormwater retention infrastructure, roads, or parking may be located within this radius.

3.3.3 EUL Alternative

In the EUL Alternative, USAG-Miami would obtain an EUL agreement with a private developer to construct and operate a housing development on the approximately 160-acre FAA parcel (Figure 2-2). This alternative would include constructing and operating a housing development as described in the Proposed Action (Section 2.1) on up to 75 acres of the northern portion of FAA parcel. In addition, up to 32.5 acres of the southern portion of the FAA parcel would be offered to a developer for a mixed-use development in exchange for funding the construction of the military housing, for a total area of development up to 107.5 acres, including site improvements. The southern development would include up to 302,000 square feet of retail space below two levels of 167 market rate apartments and would include up to 806 parking spaces. Under this alternative, no building structures would be built on the central portion (52.4 acres) of the parcel as not to interfere with radar tower operations; however, non-vertical assets such as stormwater retention infrastructure, roads, or parking may be located within this radius.

3.4 Impacts and Mitigation Measures

Under both action alternatives, the structures would be placed on fill material above the Base Flood Elevation. Approximately 3 feet of fill would be added to the proposed project area to raise the ground approximately 2 feet above the Base Flood Elevation. This would reduce the risk of flooding at the site and bring the site up to an acceptable development level. USAG-Miami would submit a request to FEMA to reassess and revise the FIRM to indicate that the filled land is outside of the Special Flood Hazard Area. Because the flood hazard derives from ponding and the threat of surge associated with storm events and is not associated with conveyance or volume of streamflow, and because post-construction stormwater controls would maintain pre-development run-off rates and volumes, there would be no increased risk of flooding for other properties. Any long-term adverse direct impacts to the flood hazard area are expected to be minor. Post-construction stormwater controls would be implemented to minimize an increase in the volume of offsite stormwater runoff from an increase in impervious area. There would be less than significant long-term adverse indirect impacts from an increase in impervious surfaces to the flood hazard area under the MILCON/Privatization and EUL Alternatives because the stormwater controls would minimize runoff increase and because the project area would be less than 0.1 percent of the surrounding area, which would result in less than 0.01 inch in rise of floodwater in the region.

4.0 Finding

During development of the Proposed Action, the Army sought ways to site the needed facilities entirely outside of floodplains while still addressing the requirements of USAG Miami's mission, operational, and safety requirements. Because of mission-related factors, such as required proximity to installation itself, and the need to keep military families close to the installation; proximity of the development area to existing facilities, lack of developable land within the same proximity, the Army determined that complete avoidance of floodplains was not feasible. Building housing at Homestead AFB would not meet the purpose and need, which is to allow military members to have affordable housing option that is within a reasonable distance of

the installation. The availability of affordable family housing is a quality of life issue and directly affects mission readiness.

Following a thorough evaluation of alternate plans, I find that there is no practicable alternative to siting some elements of the Proposed Action in floodplains. Therefore, the Army will ensure that all practicable measures to minimize impacts to and within the floodplain environment are incorporated into the Proposed Action.

Date

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Attachments:




Figure 1. Site Map

Figure 2: Flood Plain Map

EA/FONSI Construction of Military Family Housing USAG Miami

Figure 1. Site Map



- Legend**
-  Proposed Housing Development Site
 -  FAA Parcel
 -  U.S. Army Garrison-Miami

96591719134GATL - Figure 1-1_Location Map

Figure 1-1
Location Map
 Environmental Assessment
 USAG-Miami Housing Development
 Doral, Florida



Figure 2. Floodplain Map

