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**PROGRAMMATIC FINDING OF NO PRACTICABLE ALTERNATIVE
for
ROUTINE ARMY ACTIONS OCCURRING WITHIN FLOODPLAINS AND WETLANDS
AT FORT GEORGE G. MEADE, MARYLAND**

1.0 Introduction

United States (U.S.) Army Garrison Fort George G. Meade, Maryland (FMMD) has prepared a Programmatic Finding of No Practicable Alternative (PFONPA) to assess the effects of routine and ongoing activities that occur on the installation within floodplains and wetlands.

FMMD is a United States Army installation located in Maryland and home to U.S. Army Garrison (USAG) offices and approximately 85 tenants including but not limited to the National Security Agency, the U.S. Environmental Protection Agency, Defense Information Systems Agency and the Defense Information School. The main FMMD installation area occupies approximately 5,253 contiguous acres and lies midway between Washington, D.C. and Baltimore within Anne Arundel County (Attachment 1). FMMD is also responsible for two noncontiguous former missile sites located in Baltimore County including the Granite NIKE Control Site and the Phoenix Military Reservation. These two noncontiguous sites will not be considered part of this PFONPA.

1.1 Geographic and Watershed Setting

The Atlantic Coastal Plain Physiographic Province, which composes FMMD, is characterized by a flat to gently rolling lowland that borders the Chesapeake Bay, primarily composed of unconsolidated sediments like sand, silt and clay, which underly a system of streams and wetlands. FMMD is located within the greater Chesapeake Bay watershed and lies mainly within the Maryland 8-digit Little Patuxent River watershed (02131105). A very small area in the northeast corner of the installation drains to the Severn River and is in the Maryland 8-digit Severn River watershed (02131002). FMMD has approximately 38,000 linear feet (7.2 miles) of perennial streams, not including intermittent and ephemeral channels. Three primary stream systems, Midway Branch, Franklin Branch and the headwaters of Severn Run, a portion of the Little Patuxent River and Rogue Harbor Branch, as well as four standing bodies of water including Burba Lake are located on FMMD. Midway Branch, Franklin Branch and Rogue Harbor Branch and its tributaries are classified as Use I streams, Little Patuxent River and its tributaries are classified as Use I-P streams and tributaries to Severn Run are classified as Use IV streams. Midway Branch originates north of FMMD and flows south through the western half of the installation draining approximately 1,461 acres on-post. Franklin Branch originates on-site near Meade

Senior High School and flows south draining approximately 1,176 acres in the eastern half of the Installation. Franklin Branch merges with Midway Branch at the southern boundary of FMMD to form Rogue Harbor Branch which flows off-post under MD 32 and into Allen Lake. With the exception of tributaries to Severn Run, all tributaries on FMMD drain to the Little Patuxent River and flow into waters of the Patuxent Research Refuge.

1.2 Floodplains and Wetlands

According to the Integrated Natural Resource Management Plan Update for USAG FMMD, there are approximately 220 acres of wetland on the installation, the majority of which are located along the Little Patuxent River floodplain in the southwest portion of FMMD, as well as along Midway Branch, Franklin Branch, and their tributaries. Typical wetlands on the installation include palustrine forested (PFO) wetlands (typically including sweetgum, red maple, white oak, tulip tree, loblolly pine, blackgum and blueberry bushes) along the Little Patuxent River, smaller areas of palustrine emergent (PEM) and palustrine scrub shrub (PSS) wetlands, and open water habitats consisting of streams and impoundments. Little Patuxent River, Midway Branch and Franklin Branch make up the three most well-developed floodplains on the installation. Attachment 1 shows the National Wetlands Inventory and Maryland Department of Natural Resources mapped wetlands and the Federal Emergency Management Agency (FEMA) mapped 100-year floodplains on the installation.

1.3 Stormwater Management

FMMD has an extensive stormwater drainage system comprising stormwater drainpipes and associated drainage structures, supplemented by swales, ditches, other drains and retention ponds. Stormwater runoff from developed areas is conveyed to the three primary drainages, with the majority carried by Midway and Franklin Branches into the Little Patuxent River, which ultimately drains into the Chesapeake Bay. In less-developed areas on the Installation, stormwater drainage is primarily overland flow following the topography of the land. The FMMD Stormwater Program is responsible for maintaining compliance under its Municipal Separate Storm Sewer System (MS4) permit and the Chesapeake Bay Total Maximum Daily Load (TMDL) by utilizing a watershed-based approach to improve stream and wetland function, water quality and aquatic and riparian habitat. The FMMD Stormwater Management Plan includes low impact management initiatives such as rain gardens, stormwater ponds, riparian forest buffers and replacing concrete storm drains with grass swales. In many locations, wetland, floodplain, and stormwater resources are interconnected and therefore difficult to avoid completely, as illustrated on Installation maps; Installation resource managers will use best management practices (BMPs) and other mitigation measures to minimize impacts on these resources.

2.0 Proposed Action

FMMD proposes implementing a program for routine and ongoing actions occurring

within wetlands and floodplains on the Installation. FMMD seeks approval of a Programmatic Finding of No Practicable Alternative (PFONPA) in order to avoid project delays, funding loss, and deterioration of sensitive environments that could occur with lengthy, individual project FONPAs.

Many routine maintenance, renovation, demolition, and construction activities conducted at FMMD do not, individually or cumulatively, have the potential to cause significant effects on the environment. This PFONPA consolidates proposed actions of similar scope to reduce the time and resources required for individual project FONPAs to include:

- a. Maintenance and/or repair of recreational structures.
- b. New construction where impacts do not cause a major change in topography and where repairs to such structures due to flooding would not be substantial to include temporary construction for access through wetlands or floodplains.
- c. Demolition of existing structures where standard demolition practices would be applied to control sedimentation and erosion during demolition.
- d. Repairs to existing roadways and trails.
- e. Natural resources activities such as establishing land regeneration activities.
- f. Stream bank stabilization and repair in accordance with CWA and state permitting requirements. Water and land access projects including ditches, stream crossings, ramps, shoulder work and selective tree removal. Erosion control, culvert, and/or storm water collection systems restoration or replacement in accordance with CWA and state permitting requirements. Debris and sediment removal from waterways and water access points in accordance with federal and state requirements.
- g. Stream restoration activities in accordance with CWA and state permit requirements. Activities include but are not limited to installation of in-stream structures such as cobble weirs, stone steps, root wads, riffles and rock cross vanes, as well as wetland and riparian buffer enhancement and creation.
- h. Stormwater pond maintenance, repair and retrofit activities to bring ponds into compliance with current federal and state regulations, as well as facilitate access and ease of future maintenance activities. Activities include but are not limited to grading within pond footprints, installing, removing or modifying outfall and/or inflow channels and control structures, installation of plantings, and removal of woody vegetation within embankments and non-woody buffer zones and use of erosion and sediment controls in accordance with CWA and state permit requirements.
- i. Dam repair activities in accordance with CWA and state permit requirements.
- j. Studies, data collection, monitoring and information gathering that does not involve major surface disturbance.
- k. Conservation, cultural resources, forestry, wildlife, restoration, and other program management activities such as conducting archaeological resource recovery actions, restoration program site investigations, pest management activities, firebreak maintenance and other forestry activities, fish and wildlife harvesting, and other approved management activities.

- l. Installation, maintenance, repair, and/or replacement of in-kind scientific measurement devices for the purpose of monitoring environmental conditions.
- m. Maintenance of archeological, historical, and endangered/threatened species avoidance markers, fencing, and signs.
- n. Maintenance and repair of existing training areas.
- o. Upgrades to existing utilities and/or installation of new utilities where substantial damage to the utility is not anticipated, potential impacts due to flooding would be minimal, and flood-proofing measures will be implemented.
- p. Activities involving real property, including all FMMD owned parcels of land and associated structures integrated with or affixed to the land.
- q. Restoration or replacement of facilities, parking lots, existing bridges, railroad, water-crossing structures and other infrastructure to pre-existing conditions/purpose in accordance with CWA and state permitting requirements to include patchwork, replacing damaged sections of a structure in disrepair, upgrading to meet current safety standards, or partial to complete replacement.
- r. Spill response operations, including construction of temporary dams to restrict or stop flow of contaminants.
- s. Sampling, surveying, well drilling and installation, analytical testing, site preparation, and intrusive testing for the purpose of hazardous materials/hazardous waste management and operations.
- t. Daily use of tank trails, range and training lands, position artillery areas, observation points, firing points, impact areas, and other training resources for the purposes of training.

All proposed actions on the Installation are reviewed and analyzed by the FMMD Directorate of Public Works, Environmental Office in accordance with the Department of Defense National Environmental Policy Act Implementing Procedures; the National Environmental Policy Act (NEPA), as amended; Executive Orders (EOs) including EO 11988, *Floodplain Management*, as amended, EO 13690, *Establishing a Federal Flood Risk Management Standard and a Process for Further Soliciting and Considering Stakeholder Input*, EO 11990, *Protection of Wetlands* and additional applicable EOs; and permitting requirements under the Clean Water Act (CWA) and Code of Maryland Regulations (COMAR) 26.23 (Nontidal Wetlands) and 26.17 (Water Management). As part of these reviews, the Environmental Office works with project managers to determine if the proposed action can practically be located outside floodplains and/or wetlands.

FMMD intends to apply this PFONPA for actions within wetlands and/or floodplains meeting the Department of Defense National Environmental Policy Act Implementing Procedures, the CWA, and Maryland permitting requirements. FMMD will cite this PFONPA for activities that fall within the parameters of this PFONPA and where (a) the action meets all requirements for a Categorical Exclusion (CATEX) under the Department of Defense National Environmental Policy Act Implementing Procedures: Appendix A; or (b) an Environmental Assessment (EA) or an Environmental Impact Statement (EIS) has determined there are no significant impacts to wetlands and/or floodplains. An individual FONPA will be prepared if an action does not meet the criteria

of this PFONPA in accordance with the Department of Defense National Environmental Policy Act Implementing Procedures and Executive Orders 11988, 13690, and 11990.

3.0 Impacts and Mitigation Measures

3.1 Floodplain

EO 11988, *Floodplain Management*, requires executive departments and agencies to avoid, to the extent possible, the long- and short-term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct or indirect support of floodplain development wherever there is a practicable alternative.

EO 13690, *Establishing a Federal Flood Risk Management Standard and a Process for Further Soliciting and Considering Stakeholder Input*, establishes a policy of the United States to improve the resilience of communities and Federal assets against the impacts of flooding. These impacts are anticipated to increase over time due to the rise in extreme weather events, changes in flood patterns and other threats. This EO established the Federal Flood Risk Management Standard (FFRMS), "a flexible framework to increase the resilience against flooding and help preserve the natural values of floodplains." This EO also directed the Water Resources Council to "issue amended Guidelines to provide guidance to agencies on the implementation of Executive Order 11988, as amended, consistent with the Standard." EO 13690 amends EO 11988 Section 6(c) to require that a floodplain is established using one of the four following approaches:

- (i) the elevation and flood hazard area that result from using a climate-informed science approach that uses the best-available, actionable hydrologic and hydraulic data and methods that integrate current and future changes in flooding based on climate science. This approach will also include an emphasis on whether the action is a critical action as one of the factors to be considered when conducting the analysis;
- (ii) the elevation and flood hazard area that result from using the freeboard value, reached by adding an additional 2 feet to the base flood elevation for non-critical actions and by adding an additional 3 feet to the base flood elevation for critical actions;
- (iii) the area subject to flooding by the 0.2 percent annual chance flood (i.e., the 500-year floodplain); or
- (iv) the elevation and flood hazard area that result from using any other method identified in an update to the Federal Flood Risk Management Standard (FFRMS).

FMMD environmental and project management personnel work to locate proposed actions and resulting operational effects outside of floodplains. The Army will implement BMPs and Low-Impact-Development (LID) measures to reduce the potential for significant impacts on the floodplain for all actions covered under this PFONPA. Required activities that include construction in a floodplain will include resiliency measures in the event of flooding, to include flooding that exceeds normal expectations

due to rise in extreme weather events. FMMD environmental staff will ensure adherence to all local, state, and federal laws and regulations; and that the appropriate BMPs and LID measures are implemented to avoid or minimize impacts on floodplains. These BMPs and LID measures may include, but are not limited to:

- Adhere to appropriate permits from the US Army Corps of Engineers (USACE) and/or MDE to comply with Sections 404/401 of the Clean Water Act (CWA), state regulations and all BMPs established in the permitting process.
- Implement appropriate erosion and sediment controls to prevent sediment and other pollutants from leaving the work area or being carried to downstream waters. Comply with Maryland's Erosion and Sediment Control Regulations, Stormwater Management Regulations, and the Maryland Stormwater Management and Erosion & Sediment Control Guidelines for State and Federal Projects. Obtain approval from MDE's Sediment and Stormwater Plan Review Division (SSPRD), Stormwater Management (SWM) and water quality review, and Erosion and Sediment Control (ESC) review, as appropriate.
- Demarcate the construction LOD in the field to prevent encroachment on unpermitted surface water resources.
- No excess fill, construction material, or debris shall be stockpiled or stored in nontidal wetlands or the 100-year floodplain.
- Place materials in a location or manner which does not adversely impact surface or subsurface water flow into or out of nontidal wetlands and 100-year floodplains. Install silt fencing around the staging/stockpile area to retain soils and other erodible materials.
- Do not use excavated material as backfill if it contains waste metal products, unsightly debris, toxic material, or any other deleterious substance. Remove all excavated and remaining construction material from the site and dispose of material at a designated offsite facility.
- If excavating below the groundwater table, incorporate measures that minimize potential impacts to local shallow groundwater, including dewatering these areas, preventing discharges of any water potentially contaminated during construction/demolition, and restoring sites to natural subsurface conditions following construction.
- Restore temporarily impacted areas to a condition equal to or better than the pre-construction conditions. Make post-construction grades and elevations the same as the original grades and elevations in temporarily impacted areas.

For proposed actions where no practicable alternative to disturbance or development within a floodplain is available, these BMPs and LID measures would ensure impacts to floodplains are minimized to the greatest extent practicable.

3.2 Wetlands

Executive Order 11990, *Protection of Wetlands*, requires that each federal agency, to the extent permitted by law, "shall avoid undertaking or providing assistance for new

construction located in wetlands unless the head of the agency finds: (1) that there is no practicable alternative to such construction and (2) that the proposed action includes all practicable measures to minimize harm to wetlands which may result from such use.”

The term “wetlands” means “those areas that are inundated by surface or ground water with a frequency sufficient to support and under normal circumstances does or would support a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction.”

The FMMD Environmental Office will review all actions proposed to occur in wetlands. FMMD environmental staff work with project management personnel to locate and design proposed actions and resulting operational effects outside of wetlands to the greatest extent practicable. The FMMD environmental staff will ensure adherence to all local, state, and federal laws and regulations; and that the appropriate BMPs and LID measures are implemented to avoid or minimize impacts to wetlands. The Army will implement appropriate BMPs and LID measures to reduce the potential for significant impacts to wetlands for all actions covered under this PFONPA. These BMPs and LID measures include those described in Section 3.1 and also may include:

- Use lightweight equipment, which will lessen the impact in a wetland area.
- Use low-impact vehicles when working in wetlands. Employ the use of equipment with wide tires, rubberized tracks, and low ground pressure (< 3 psi) to avoid rutting and soil compaction. Each track can be between 1.5 to 3 feet wide, with length depending on the width of the vehicle.
- Use swamp, timber, or similar mats in wetlands to minimize soil disturbance and rutting when work needs to occur in wetter conditions; and conduct work manually in areas where mechanized equipment cannot avoid soil disturbance. Try to access work areas through drier sections of wetlands where possible.
- Woody vegetation (shrubs and trees) will be cut to ground level using hand and mechanical means and not uprooted in order to avoid disturbance to soil structure.
- Reseed and mulch disturbed wetlands and wetland buffers to reduce erosion after construction activities have been completed. All stabilization in the nontidal wetland shall consist of the following species: Annual Ryegrass (*Lolium multiflorum*), Millet (*Setaria italica*), Barley (*Hordeum* sp.), Oats (*Uniola* sp.), and/or Rye (*Secale cereale*). These species will allow for the stabilization of the site while also allowing for the voluntary revegetation of natural wetland species. Kentucky 31 fescue shall not be utilized in wetland or buffer areas.

4.0 Public Review

This programmatic finding of no practicable alternative (PFONPA) was made available for public review and comment from 2 February 2026 through 16 February 2026. A notice of availability was published in The Capital Gazette, and was available at <https://home.army.mil/meade/my-fort/all-services/environmental>.

Written comments and questions were directed to: Ms. Rebecca Marson, NEPA Program Manager, Directorate of Public Works, United States Army Garrison, Fort

George G. Meade, 4409 Llewellyn Avenue, Fort Meade, Maryland (MD) 20755. Ms. Marson was also available for questions by phone at (301-677-9185 and by email at rebecca.j.marson.civ@army.mil. Standard comments were received from **TBD**.

5.0 Finding of No Practicable Alternative

Due to operation requirements on the Installation, complete avoidance of floodplains and wetlands is not feasible; however, the actions covered by this PFONPA will minimize potential impacts to floodplains and wetlands to the greatest degree practicable while also achieving the required results. FMMD will take all practical measures to minimize impacts associated with these activities to and within floodplains and wetlands pursuant to EOs 11988, 13690, 11990, as applicable.

Accordingly, I find there is no practicable alternative to the proposed action; however, the Army will ensure that all practicable measures to minimize wetland and floodplain impacts are incorporated into the proposed action. This PFONPA is effective as of this date and will be reviewed annually by installation subject matter experts to ensure continued accuracy.

Date

Yolanda D. Gore
COL, AG
Garrison Commander

Attachments:

Attachment 1. Wetlands and Floodplains on Fort George G. Meade, Maryland
Attachment 3: Public Comments
Attachment 4: Fort George G. Meade Comment Responses

References:

EO 11988
EO 13690
EO 11990
Integrated Natural Resources Management Plan Update for USAG FMMD