



DEPARTMENT OF THE ARMY
HEADQUARTERS, U.S. ARMY MATERIEL COMMAND
4400 MARTIN ROAD
REDSTONE ARSENAL, AL 35898-5000

DEC 13 2023

AMIL-EED

MEMORANDUM THRU Department of the Army Deputy Chief of Staff, G-9 (DAIN-ISE),
600 Army Pentagon, Washington, DC 20310-0600

FOR Deputy Assistant Secretary of the Army for Installations, Housing and Partnerships
(DASA-IH&P), 110 Army Pentagon, Washington, DC 20310-0110

SUBJECT: Approve Programmatic Finding of No Practicable Alternative for Routine and
Ongoing Actions Occurring within Wetlands and the 100-Year Floodplain on Fort
Stewart and Hunter Army Airfield, Georgia

1. References:

a. US Army Installation Management Command (IMCOM) memorandum, 2 Oct 23,
with the same subject as for this memo.

b. US Army Garrison, Fort Stewart/Hunter Army Airfield memorandum, 30 Jun 23,
with the same subject as for this memo.

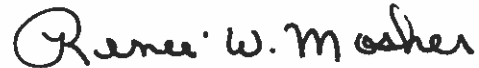
2. Reference memoranda (encl 1 & 2) requests DASA-IH&P approve the FONPA for
subject actions as no practicable alternative was deemed viable for planning 100% of
routine and ongoing actions outside of floodplains and wetlands, with routine and
ongoing actions further defined in section 2 of the FONPA. As a result of US Army
Materiel Command staffing, the FONPA was updated (encl 3). Updates were
coordinated with IMCOM, the garrison, and US Army Environmental Command.

3. I approve submission of subject request for DASA-IH&P approval.

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4. My point of contact is Ms. Pam Klinger at DSN 320-9156, commercial 256-450-9156 or pamela.m.klinger2.civ@army.mil.



RENEE' W. MOSHER
Deputy Chief of Staff, G-4

5 Encls

1. IMCOM Memo, 2 Oct 23
2. Installation Memo, 30 Jun 23
3. Programmatic FONPA
4. Public Notice
5. Routine and Ongoing Actions qualify for a CX

**DEPARTMENT OF DEFENSE
UNITED STATES ARMY
PROGRAMMATIC FINDING OF NO PRACTICABLE ALTERNATIVE FOR ROUTINE
AND ONGOING ARMY ACTIONS OCCURRING WITHIN
WETLANDS AND THE FLOODPLAINS
AT FORT STEWART / HUNTER ARMY AIRFIELD, GEORGIA**

1.0 Introduction

Fort Stewart, Georgia (FSGA) is a 289,000-acre U.S. Army Installation Management Command (IMCOM) installation located in southeastern Georgia. Located adjacent to the city of Hinesville, it lies within portions of five separate counties (Bryan, Evans, Liberty, Long, and Tattnall) (Figure 1) and is home to the 3rd Infantry Division (3ID), a combined arms and infantry division, and direct subordinate unit of the XVIII Airborne Corps. Hunter Army Airfield, Georgia (HAAF) is a 5,400 acre IMCOM installation located 40 miles to the east of FSGA, adjacent to the City of Savannah, and is the home of the 3ID Combat Aviation Brigade. Collectively, FSGA/HAAF serves as a major power project platform and provides a full spectrum of individual and collective training for combat, combat service, and combat service support personnel. The installation also provides administrative, residential, recreational, and other valuable support services to the Soldiers, Families, and Civilian employees who work and/or reside on the installation.

Fort Stewart contains 176,420 acres of floodplains and 85,785 acres of wetlands, and HAAF contains 5,400 acres and contains 1,413 acres of floodplains and 1,639 acres of wetlands. In many locations, the wetlands and floodplains are interconnected. Due to the preponderance of these resources on the installation, including within the existing built-up areas (such as the cantonment), the avoidance of wetlands and floodplains while implementing routine mission requirements is difficult and often not practicable. To support these mission requirements, the installation proposes to enact a Programmatic Finding of No Practicable Alternative (PFONPA) for actions occurring within wetlands and floodplains determined to be routine and ongoing. This will reduce the amount of time, resources, and administrative burden associated with preparing individual project-level FONPAs for each action as it is proposed. Activities that do not meet criteria established in this PFONPA will require an individual project-level FONPA.

This PFONPA was available for a 30-day public review and comments period on the FSGA/HAAF National Environmental Policy Act (NEPA) webpage (<https://home.army.mil/stewart/index.php/about/Garrison/DPW/environmental/prevention-and-compliance/nepa>.) (December 21-January 19, 2023) and a Notice of its Availability was published in the Savannah Morning News, Coastal Courier, and The Frontline, which is hereby incorporated by reference. No comments were received during this time, and a public meeting was not required.

2.0 Proposed Action

Fort Stewart/HAAF proposes to implement a PFONPA for routine and ongoing actions occurring within wetlands and floodplains on FSGA/HAAF. The Wetlands and Floodplains POCs review all project submittals via the FSGA/HAAF NEPA process and will determine if an action meets the criteria suitable for tiering from this PFONPA.

These criteria are: (a) the anticipated impact is no more than negligibly adverse to wetlands and/or floodplains; (b) the action falls within the boundary of those approved in this PFONPA; and (c) the action meets all requirements for a Categorical Exclusion under 32 CFR Part 651 (Appendix B). If the action does not qualify for the PFONPA, the NEPA POC will begin preparation of an individual FONPA for that action, in accordance 32 CFR Part 651 (Appendix B) and EOs 11988, 13690, and 11990.

The actions covered for this PFONPA include:

- a. Interior renovations, repairs, and/or maintenance to existing facilities and infrastructure that do not involve ground disturbance and that remain within the interior of the identified facility. Examples include removal of asbestos containing materials or lead based paint abatement and removal.
- b. Exterior renovation and/or repairs to existing facilities and infrastructure that involve ground disturbance, but which meet the criteria for a nationwide permit. Examples of which include minor repairs to buildings, parking lots, sidewalks, dams, and bridges.
- c. Maintenance and repair of existing roads, tank trails, railroads, and/or other transportation conveyances within the cantonment area and the range and training lands. Examples include quarterly maintenance, application of gravel, stabilization, ditching, and/or grading.
- d. Maintenance, repair, restoration, and/or replacement of existing bridges, dams, railroads, and other water-crossing structures in accordance with required CWA requirements. Examples include patchwork, replacing damaged sections of a structure in disrepair, upgrading to meet current safety standards, or partial-to-complete replacement.
- e. Maintenance and/or repair of recreational structures, such as docks, boat ramps, and sports fields.
- f. Maintenance and/or repair of components of the stormwater drainage system. Examples include culverts, ditches, and restoration or replacement-in-kind in accordance with CWA requirements, as well as shoulder work, reshaping, debris removal, erosion rills and culvert replacement within existing systems.
- g. Maintenance and repair of upland training areas, such as firing points, bivouac areas, maneuver areas, marshaling points.

- h. Maintenance and repair associated with bank stabilization projects, to include ponds, streams, rivers, and areas within upland systems, with an approved erosion and sedimentation plan.
- i. Spill response operations, including construction of temporary dams to restrict or stop flow of contaminants.
- j. Installation, maintenance, repair and/or replacement of in-kind scientific measurement devices, such as metering, for the purpose of monitoring environmental conditions.
- k. Temporary construction for access through footprinted and delineated wetlands or floodplains (as established/confirmed by the FSGA/HAAF Wetlands and Floodplains POCs) if no wider than 12 feet, no greater than 1/10 of an acre, and for no longer than 30 days. Activity must also be approved by the FSGA/HAAF Conservation Branch, Cultural Resources Section, and other resource managing authorities, as applicable to the specific action.
- l. Streambank and shoreline stabilization in accordance with CWA and Coastal Zone Management Act requirements.
- m. General land maintenance and repairs that do not increase the amount of impervious material within a watershed, examples of which include dam maintenance, tree and brush removal along roads/railroad tracks/fence lines, grounds maintenance, mowing, and landscaping.
- n. Demolition of existing structures in accordance with 32 CFR Part 651 (Appendix B) (c)(2), where standard demolition practices would be applied to control E&S concerns during demolition.
- o. Upgrades to existing utilities and/or installation of new utilities within an existing right-of-way.
- p. Debris and sediment removal from waterways and water access points in accordance with federal and state requirements.
- q. Conservation, cultural resources, forestry, restoration, and other program management activities such as establishing and maintaining food plots, land regeneration activities, conducting archaeological resource recovery actions, conducting restoration program site investigations, pest management, and firebreak maintenance/other forestry activities, fish and wildlife harvesting, enhancement, and/or other approved management activities.
- r. Recreational use of areas within wetlands and the floodplain to include, but not limited to, fishing, golfing, boating, and hiking.
- s. 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.

3.0 Impacts and Mitigation Measures

3.1 Floodplain

EO 11988, Floodplain Management, and EO 13690, Establishing a Federal Flood risk Management Standard, state that if the only practicable alternative requires siting in a floodplain, the agency shall, prior to taking action, design or modify its action to minimize potential harm to or within the floodplain, and it is Department of Defense policy to minimize construction within floodplains. Therefore, where possible, installation POCs shift proposed actions out of floodplains in the project planning phase (via mitigation by design). The FSGA/HAAF Floodplain POC will review all proposed actions, and the installation will follow all local, state, and federal laws, and incorporate BMPs to reduce erosion, runoff, encroachment, and maintain water quality.

Taken together, these mitigation tactics would avoid and/or minimize impacts to floodplains on FSGA/HAAF, and these measures represent all practicable measures to minimize harm to floodplains.

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) 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 FSGA/HAAF Wetlands POC will review all proposed action, and the installation will follow all local, state, and federal laws, as well as any permitting requirements, and will incorporate BMPs to reduce erosion, runoff, encroachment, and maintain water quality.

Taken together, these mitigation tactics would avoid and/or minimize impacts to wetlands on FSGA/HAAF, and these measures represent all practicable measures to minimize harm to wetlands.

4.0 Finding of No Practicable Alternative

Following an evaluation of the impacts associated with conducting routine and ongoing activities, as defined in this PFONPA, I find that there is no practicable alternative to conducting these activities within wetlands and the floodplain, due in part to the preponderance of these resources on this installation. Furthermore, pursuant to EOs 11988, 13690, and 11990, and as described above, FSGA/HAAF will take all practical measures to minimize impacts associated with these activities to and within the wetlands and floodplain environment. This PFONPA is effective from the date on which it is signed and will be reviewed annually by the installation subject matter experts to ensure protection of installation resources.

Carla K. Coulson
Deputy Assistant Secretary of the Army
(Installations, Housing & Partnerships)

Attachments:

Figure 1. FSGA/HAAF Location Map
Figure 2. FSGA Wetlands and Floodplains
Figure 3. HAAF Wetlands and Floodplains

References:

EO 11988
EO 11990
EO 13690

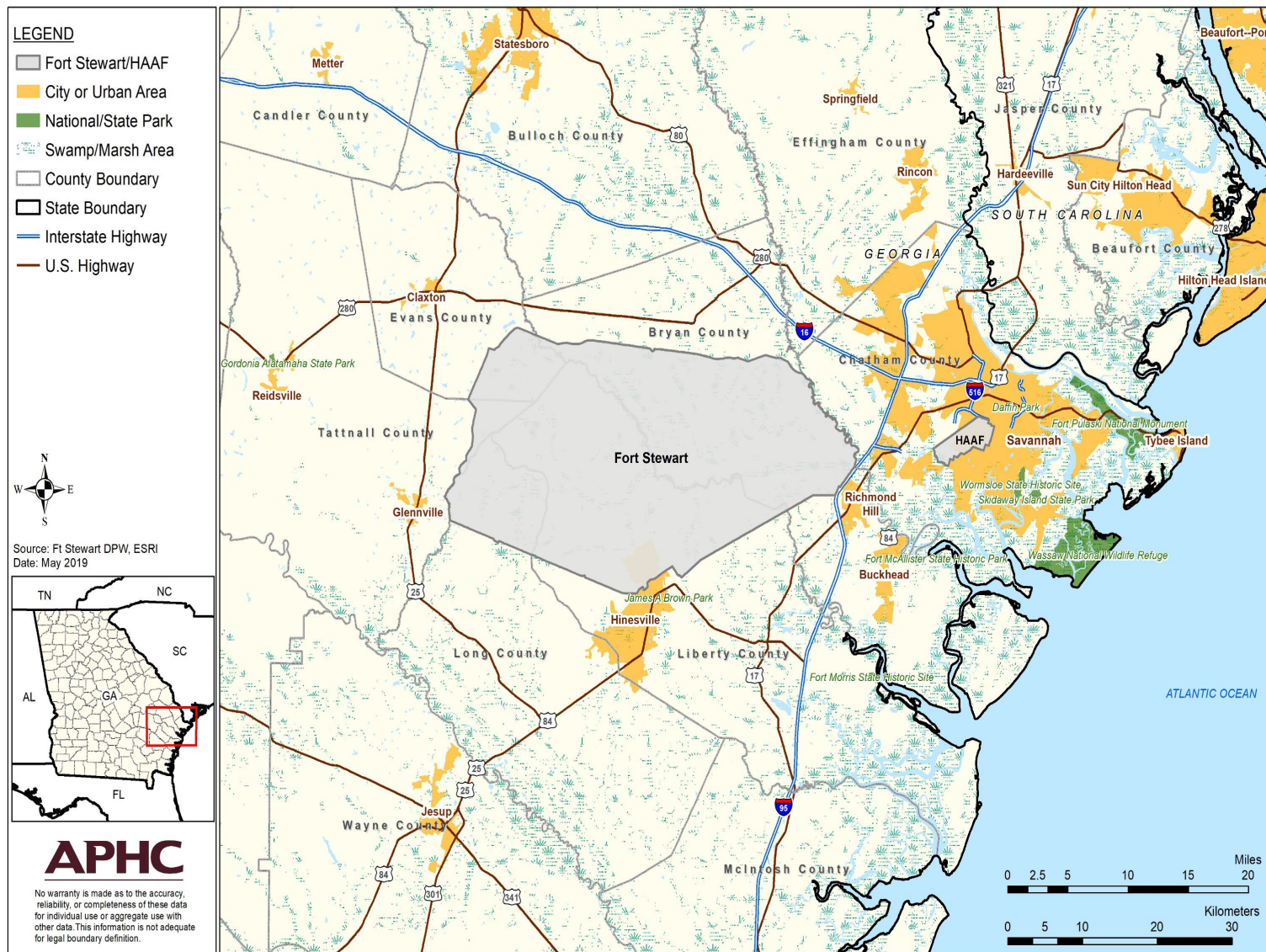


Figure 1: location Map for Fort Stewart and Hunter Army Airfield, Georgia.

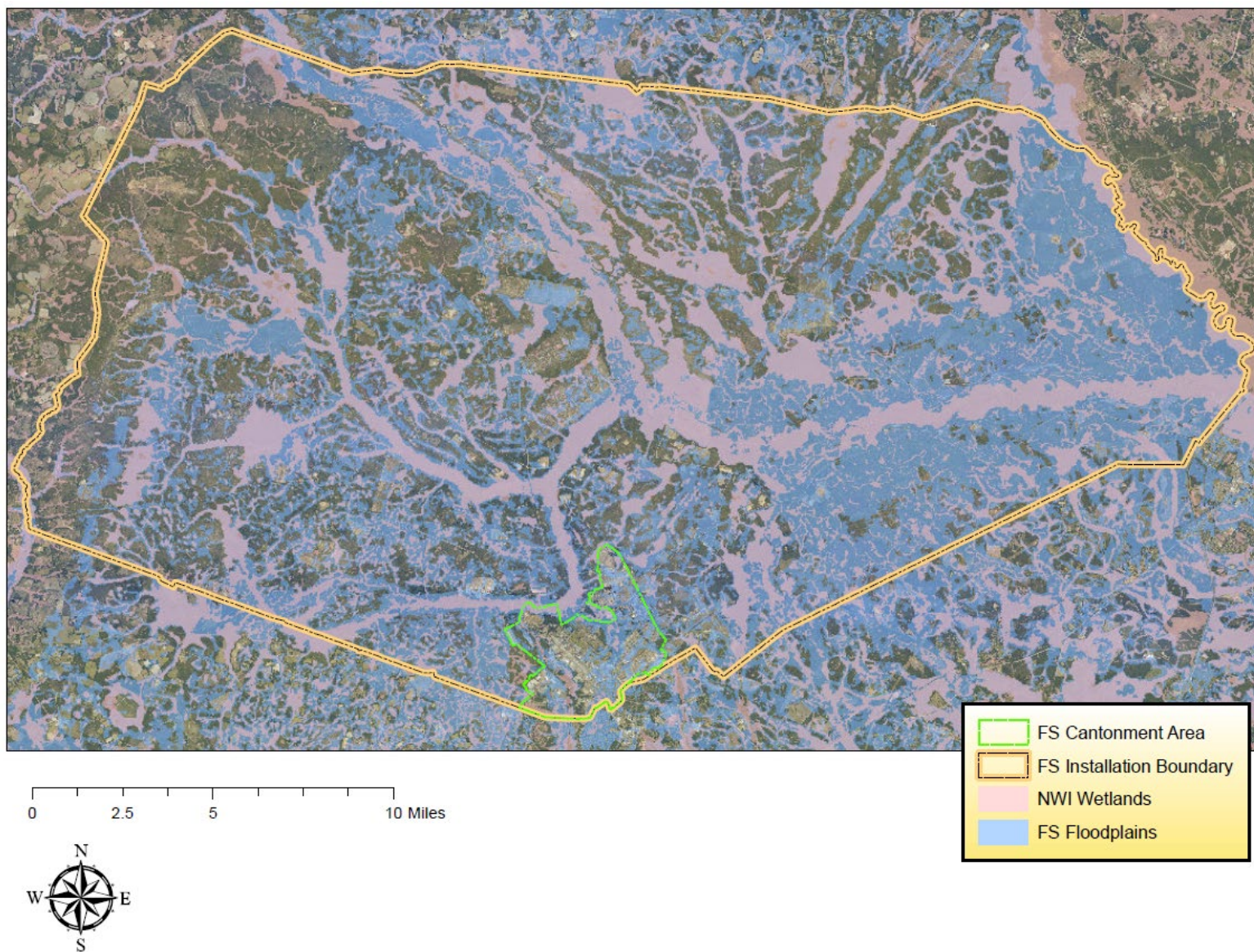


Figure 2: Wetlands and Floodplains on Fort Stewart, Georgia.

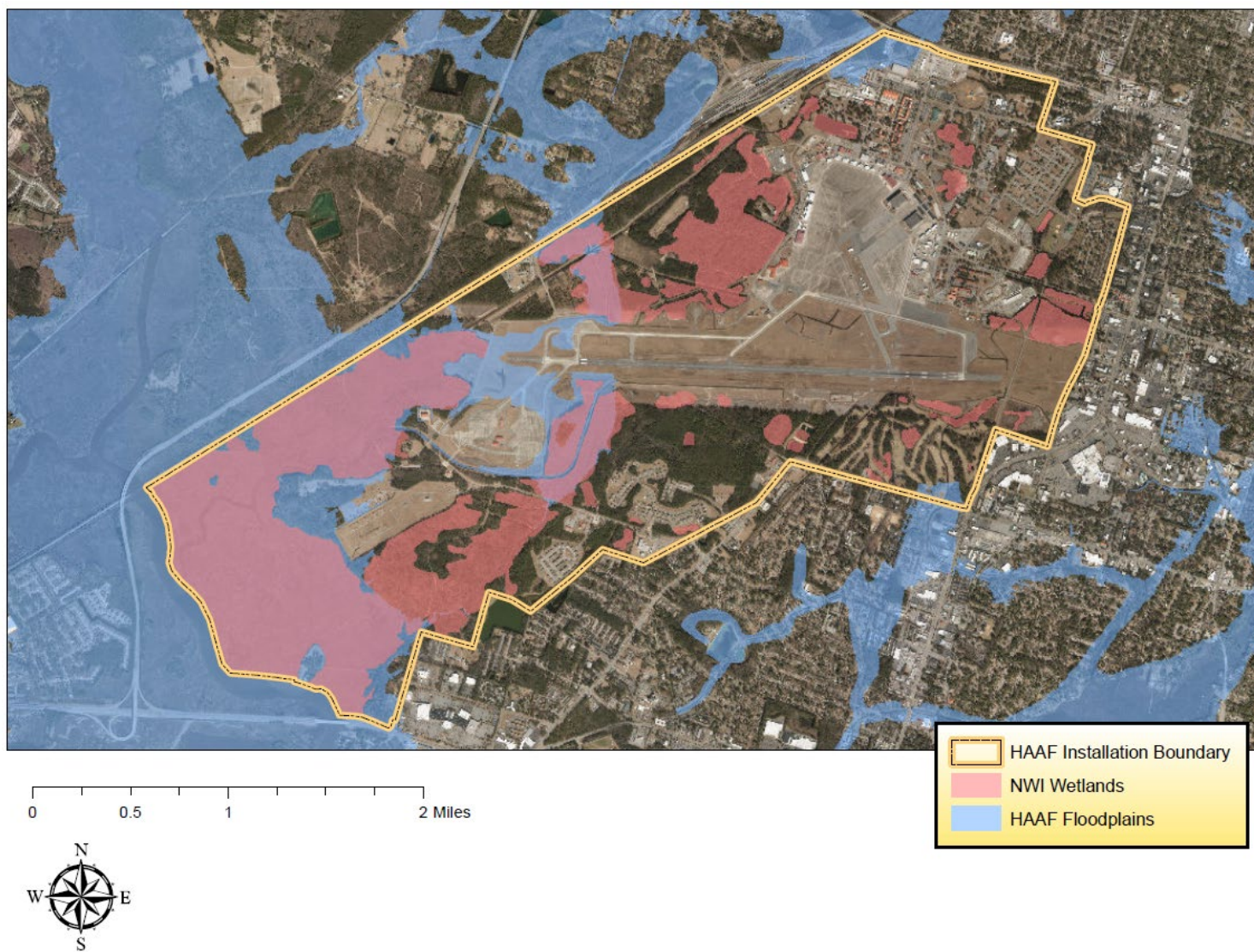


Figure 3: Wetlands and Floodplains on Hunter Army Airfield, Georgia.