

DEPARTMENT OF DEFENSE
UNITED STATES ARMY
***Draft* PROGRAMMATIC FINDING OF NO PRACTICABLE ALTERNATIVE**
TO IMPLEMENT AIRFIELD IMPROVEMENT PROJECTS AT
WRIGHT ARMY AIRFIELD/MIDCOAST REGIONAL AIRFIELD ON
FORT STEWART, GEORGIA

1.0 INTRODUCTION

Fort Stewart, Georgia (FSGA), is a U.S. Army Installation Management Command Installation located in southeastern Georgia. Consisting of 280,000 acres, it is located adjacent to the city of Hinesville and within portions of five separate counties (Bryan, Evans, Liberty, Long, and Tattnall) (Figure 1). The installation is home to the 3rd Infantry Division, a combined arms and infantry division and a direct subordinate unit of the XVIII Airborne Corps, collectively serving as a major power project platform providing a full spectrum of individual and collective training for combat, combat service, and combat service support personnel.

Wright Army Airfield (WAAF)/MidCoast Regional Airfield (MCRA) is a joint-use military and civilian airfield on FSGA that is operated and maintained by the U.S. Army at FSGA and the Liberty County Development Authority (LCDA). The LCDA proposes, implements, and maintains all improvements on the civilian portion of the airfield, their exclusive use area (EUA), for which they have an easement with the U.S. Army at FSGA. The military proposes, implements, and maintains all improvements on the military side of the airfield, although the Army at FSGA maintains oversight of the airfield as the owner of the underlying land. The LCDA vision for future airfield improvement projects is tracked in its strategic plan, and the military also tracks its vision for the airfield's future development via its Area Development Plan (ADP). These plans are updated and renewed on five-year cycles, and each ensures that WAAF/MCRA is optimally positioned to anticipate and provide for the needs of both its military and civilian users.

WAAF consists of 2,498 acres and includes approximately 220 acres of floodplains and 180 acres of wetlands, resources that are often interconnected. On WAAF, 82% of WAAF (2,056 acres) is available for development, although with some restrictions in certain areas (Figure 2). The installation works diligently during the siting phase to shift projects out of and away from wetlands and floodplains to the best of its ability, and as a result, installation resource managers have become adept at ensuring proper design, impact minimization measures, and best management practices (BMPs) are incorporated into all proposed actions and are well suited to avoid or minimize impacts to these resources.

This PFONPA, its Programmatic Environmental Assessment (PEA), and Finding of No Significant Impact (incorporated herein by reference) were available for public review

and comments on the FSGA/WAAF webpage (<https://home.army.mil/stewart/index.php/about/Garrison/DPW/environmental/prevention-and-compliance/nepa>) for 30 days (December 8, 2023 – January 6, 2024). Its Notice of its Availability will be also published in the *Savannah Morning News*, *Coastal Courier*, and *The Frontline* for the same time period, which is hereby incorporated by reference. The PEA was written in accordance with the National Environmental Policy Act, the Council on Environmental Quality regulations that implement NEPA, and 32 Code of Federal Regulations Part 651, Environmental Analysis of Army Actions.

2.0 PROPOSED ACTION

The U.S. Army proposes to implement required improvements at WAAF/MCRA. These proposed actions will ensure critical actions are implemented that support critical civilian and military mission execution, improve usability of the overall airfield, and allow the joint-use airfield to adapt to future demand as it develops into an important economic and strategic hub for the region.

3.0 IMPACTS AND MITIGATION MEASURES

3.1 Floodplain

EO 11988, 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. It is the Department of Defense policy and goal to minimize construction within areas designated as wetlands and floodplain. Therefore, where possible, installation POCs shift proposed actions (fully or partially) out of floodplains in the project planning and design phases (via mitigation by design).

Floodplain impacts are anticipated from construction of the access road and perimeter fence, both required to ensure installation security on WAAF (Figure 3). Both are sited within Buildable Areas 1 and 2 (Figure 2). The footprint and route of the access road has been worked extensively by installation POCs (Floodplains, Wetlands, Design, LCDA POCs) to minimize impacts as much as possible; however, total avoidance of floodplain impacts was determined to be not practicable. The currently proposed path will be further adjusted as the project enters the design phase.

Second, floodplains may be impacted during construction of security fencing on the eastern and northern side of WAAF; however, this project is currently in the concept phase, with only the initial scope of work known, and it is anticipated that once an up-to-date siting, scope of work, and survey of aquatic resources is completed, avoidance of impacts to floodplains may be possible. If not, and avoidance is determined not practicable, this FONPA will be supplemented.

As each project is funded, the FSGA/HAAF Floodplain POC will work with the design team to minimize potential impacts to floodplains. All new construction is designed to reduce the risk of flood loss and to minimize the impact of floods on human safety, health, and welfare, and the Army will implement best management practices and low-

impact development measures towards these goals. The installation will also comply with all local, state, and federal regulations.

Taken together, these measures would avoid and/or minimize the loss of and impacts to floodplains at WAAF, 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.

Wetland impacts are anticipated from construction of the access road and the perimeter fence. The footprint and route of the access road has been worked extensively by installation POCs (Floodplains, Wetlands, Design, LCDA POCs) to minimize impacts as much as possible; however, total avoidance of wetland impacts was determined to be not practicable.

Construction of the proposed access road will impact 1.703 acres of jurisdictional wetlands (Figure 4). An approved jurisdictional determination (AJD) of the aquatic resource boundaries and their jurisdictional status is complete and was issued by the U.S. Army Corps of Engineers (USACE) – Savannah District on September 28, 2021. The LCDA, as the permit applicant, will submit a Standard Individual Permit (IP) to the USACE – Savannah District for permitting the proposed access road impacts through Section 404 of the CWA, and the impacts will be offset through purchase of mitigation credits in accordance with the USACE – Savannah District 2018 Standard Operating Procedure (SOP) from a commercial mitigation bank whose primary service area (PSA) is located within the impact location. A total of 1.60 2018 SOP wetland credits (12.80 legacy wetland credits) will be required to offset the impacts to jurisdictional wetlands. The wetland mitigation credit purchase will be completed after the USACE – Savannah District issues the IP for the project and documentation of the purchase will be provided to USACE – Savannah District prior to initialization of work being completed within the impact areas.

Impacts are anticipated to wetlands from the construction of security fencing on the eastern and northern side of WAAF; however, as previously indicated, this project is in the concept phase only, and avoidance of wetlands is anticipated. If avoidance of impacts wetlands is not practicable, this FONPA will be supplemented. As each project is funded, the Wetlands POC will work with the design team to minimize potential impacts to wetlands. The installation will comply with all local, state, and federal regulations for any actions with the potential to impact local waters, and all permitting (if/when required) must be complete/and approved by the FSGA/HAAF Wetlands POC prior to commencing any work.

Taken together, these mitigation measures would avoid and/or minimize the loss of and impacts on wetlands at WAAF and represent all practicable measures to minimize harm to wetlands.

4.0 FINDING OF NO PRACTICABLE ALTERNATIVE

During development of the Draft EA for WAAF, the Army at FSGA and the LCDA worked proactively to ensure the purpose and need of the Proposed Action was met while also avoiding as many potential impacts to floodplains and wetland as practicable. Due to operational requirements, it was determined that complete avoidance of floodplains and/or wetlands was not practicable; however, the Proposed Action minimizes potential impacts to the greatest degree practicable while also achieving the desired results. Accordingly, I find there is no practicable alternative to siting the Proposed Action entirely outside of the floodplains and/or wetlands; however, the Army will ensure that all practicable measures to minimize impacts are incorporated into the Proposed Action.

Ms. Carla Coulson
Acting Deputy Assistant Secretary of the
Army Installations, Housing & Partnerships

Attachments:

Figure 1. WAAF/MCRA Location Map.

Figure 2. WAAF/MCRA Developable Areas.

Figure 3. Floodplains associated with Road Crossing, WAAF / MCRA, FSGA.

Figure 4. Wetlands associated with Road Crossing, WAAF / MCRA, FSGA.

References:

EO 11988

EO 11990

EO 13690