

**DEPARTMENT OF DEFENSE
UNITED STATES ARMY
FINDING OF NO PRACTICABLE ALTERNATIVE FOR
CARGO STAGING AREA PROJECT AT
MILITARY OCEAN TERMINAL CONCORD (MOTCO)**

1.0 INTRODUCTION

Military Ocean Terminal Concord (MOTCO) is in Contra Costa County, approximately 29 miles east of San Francisco, CA, approximately ten miles inland past the Carquinez Strait that connects Suisun Bay to San Pablo Bay. MOTCO is a military munitions and general cargo transshipment facility responsible for significant Department of Defense (DoD) West Coast capacity. The installation is comprised of two separate areas—the Tidal Area and Inland Area. The Inland Area is composed of approximately 115 acres, and the Tidal Area is approximately 6,242 acres, which includes 2,045 acres of offshore islands. These two areas are connected by the Port Chicago Highway. MOTCO also operates three ocean terminal wharves and an Army-owned rail system that connects with two major commercial rail lines.

EO 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.”

2.0 PROPOSED ACTION

2.1 Proposed Action

To remain mission capable, the installation must have safe and efficient facilities. The advanced age and poor or outdated condition of many of the installation's facilities and attendant infrastructure systems create a need for renovation, replacement, or redevelopment based on three factors: 1) functional obsolescence, 2) operational safety or efficiency, and

3) resource conservation. The Cargo Staging Area Project would maximize efficiency to meet current and future cargo handling mission requirements. The Cargo Staging Area Project would increase safety and efficiency of the cargo handling operations at MOTCO. Furthermore, the proposed expansion and reconfiguration would give the installation more operational flexibility and increase cargo processing speed.

The Department of the Army (Army) proposes to construct eleven new holding pads adjacent to eight existing pads at MOTCO (Proposed Action). Site development includes grading, landscaping, and pavement improvements. Each holding pad encompasses 23,000 square feet to include associated supporting facilities (e.g., storage pads and protective barriers), in compliance with safety standards and equipment handling for day and night operations. New roadways will be constructed to access each pad and designed to allow easy emergency vehicle access. New power, communication, and water lines will provide lighting, security, and fire hydrant usage. Ten new protective berms will be constructed, and two existing berms will be extended and elevated to protect new and existing pads in event of accidents. Also, replacement of existing retaining walls on the barricades for pads three and seven, as well as construction of a new barricade for pad eight, is included in the proposed work. Drop inlets and reinforced concrete pipes will supplement storm drainage mitigation along with specific site grading.

2.2 Alternatives Considered

In accordance with the National Environmental Policy Act (NEPA) and 32 CFR 561, feasible alternatives, including the No Action Alternative, were considered for implementing the Proposed Action. The Mission Activities and Facility Reinvestment Programmatic Environmental Assessment (PEA; MOTCO 2021) evaluated four alternatives. The Proposed Action (Preferred Alternative) and No Action Alternative were carried forward for analysis in the PEA. Alternatives that were eliminated from further study included the following:

Renovation of all facilities for reuse rather than demolishing and redeveloping them. This alternative was eliminated from further consideration because it was not considered operationally efficient or economically feasible to recapitalize and reconfigure facilities that have significant structural and/or functional deficiencies. In addition, renovation would not remove or relocate facilities with non-cargo related functions that are currently within Safety Quantity Distances arcs. Therefore, this alternative was not evaluated in detail.

Implementation of actions requiring real estate boundary changes. Because of the high level of coordination, lengthy development time, and high cost, this alternative was not evaluated in detail.

3.0 IMPACTS AND MITIGATION MEASURES

3.1 Wetlands

Based on field observations, USACE Sacramento District determined emergent, non-jurisdictional (33 CFR 328.3) freshwater wetlands (based on USACE wetland delineation manual guidance) exist within the project area. Construction of the holding pad expansion would impact a total of 52 acres, which would include permanent impacts to 0.13 acres of wetlands and temporary impacts to 0.33 acres of wetlands, with a total fill quantity of 725 cubic yards of fill dirt.

Under the Proposed Action, the Army would implement best management practices (BMPs) and mitigation measures to reduce the potential for adverse impacts on the wetlands. BMPs and mitigation measures are incorporated into the Proposed Action to avoid or minimize impacts on wetlands and are collectively described, as follows: On-site environmental training will be provided to contractor staff to brief them on the need to avoid and minimize impacts to wetlands during construction; equipment will be required to be free of noxious weeds; exclusion buffers will be enforced to protect unimpacted wetlands; access roads and staging areas will be clearly demarcated for travel outside wetland areas; equipment maintenance and refueling will occur a minimum of 100 feet from existing wetlands. Additionally, erosion and sediment control measures consistent with project-specific Storm Water Pollution Prevention Plan will be implemented to ensure onsite contaminants do not impact wetlands.

Taken together, these proposed BMPs and mitigation measures would avoid or minimize the loss of and impacts to wetlands at MOTCO. These proposed mitigation actions represent all practicable measures to minimize harm to wetlands.

This draft FONPA will be made available for public review and comment for 15 days. It will be published in Contra Costa Times April 17, 2025 which is hereby incorporated by reference.

4.0 FINDING OF NO PRACTICABLE ALTERNATIVE

During development of the Proposed Action, MOTCO Environmental Office worked proactively to ensure the purpose and need of the Proposed Action was met while also avoiding as many potential impacts to wetlands as practicable. Due to operational requirements, it was determined that complete avoidance of wetlands was not feasible; however, the Proposed Action minimizes potential impacts to the greatest degree practicable while also achieving the required results.

Accordingly, I find there is no practicable alternative to siting the Proposed Action in wetlands; however, the Army

will ensure that all practicable measures to minimize impacts are incorporated into the Proposed Action.

Date

OMAR J. JONES IV
Lieutenant General, USA
Commanding

References:

EO 11990, *Protection of Wetlands*, 24 May 1977.

Mission Activities and Facility Reinvestment Programmatic Environmental Assessment. 2021. Military Ocean Terminal Concord. Contra Costa County, CA.