

**DEPARTMENT OF DEFENSE
UNITED STATES ARMY**

**DRAFT FINDING OF NO PRACTICABLE ALTERNATIVE
FOR MASTER PLAN ACTIVITIES AT MILITARY OCEAN
TERMINAL CONCORD (MOTCO),
CONTRA COSTA COUNTY, CALIFORNIA**

1.0 Introduction

The Department of the Army (Army) proposes to implement various master plan activities at Military Ocean Terminal Concord (MOTCO), which consist of construction, sustainment and/or renovation, and modernization projects. Pursuant to Executive Order (EO) 11990, *Protection of Wetlands*, the Army must evaluate whether there is a practicable alternative to locating the Proposed Action in a floodplain or wetlands, respectively. The practicability of a given alternative is evaluated by determining whether it is available and capable of being done after considering pertinent factors, such as community welfare, environmental impact, statutory authority, legality, cost, technology, and engineering within the context of the project purpose. If the only practicable alternative requires siting in a floodplain and/or wetlands, the Army must design or modify its action to minimize harm to or within the floodplain and/or wetlands. Thereafter, the Army must prepare and circulate a notice containing an explanation of why the action is proposed to be in the floodplain and wetlands.

The Army has determined elements of this Proposed Action must be located within portions of the 100-year floodplain and minimal portions of the wetlands at MOTCO. This Draft Finding of No Practicable Alternative (FONPA) incorporates the analysis and conclusions of the Environmental Assessment (EA) for Master Plan Activities at MOTCO, California.

2.0 Notice of Floodplain and Wetland 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. "Floodplain" is defined in the EO as "the lowland and relatively flat areas adjoining inland and coastal waters including flood prone areas of offshore islands, including at a minimum, that area subject to a one percent or greater chance of flooding in any given year." The 100-year floodplain represents those areas that could be inundated in the event of high flood water levels expected to occur once every 100 years from the combination of heavy rainfall, high tides, and storm surges. Based on existing Federal Emergency Management Agency Flood Insurance Rate Maps, the Army concluded that several of the proposed projects identified in the EA would occur within the 100-year floodplain associated with the Suisun Bay.

EO 11990 requires federal agencies to determine whether a proposed action would occur within wetlands. "Wetlands" are defined in the EO as "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.”

Publication of the Notice of Availability (NOA) for the EA commences a 30-day public review period for the EA and associated Draft Finding of No Significant Impact (FONSI). As stated in the notice, this 30-day public comment period also applies to comments on this Draft FONPA.

3.0 Description of the Proposed Action, Floodplain and Wetlands Impacts, and Minimization

The Proposed Action is to construct, operate, and maintain real property projects currently planned for implementation between fiscal year (FY) 2027 to FY 2030 (FY27–FY30) at MOTCO. These include implementation of installation-wide framework elements of and standards for planned implementation of specific actions/projects as identified in the MOTCO Area Development Plan (ADP).

The EA depicts locations and lists the projects identified in the master planning process that could occur in the 100-year floodplain or within wetland areas and are currently planned to be implemented between FY27-FY30.

Assessment of Direct Impact to 100-Year Floodplain

The locations and functions for the proposed construction of new buildings or facilities within the 100-year floodplain were identified through the master planning process. Five of the proposed projects would occur in or on the edge of the 100-year floodplain. Project 4, the Mt Diablo Creek Flood Control, would result in fewer flooding events due to the channelization of Mt Diablo Creek, which regularly floods in high precipitation events. Once the full design for the channelization of Mt Diablo Creek is complete, floodplains would be reassessed for this portion of the creek as there could be an alteration of the extent of the floodplain once constructed. Projects 2, 8, 9, and 10 would not substantially alter drainage patterns or increase the potential for flooding or flood-related damage. The Army has evaluated and determined there are no practicable alternatives to these projects outside the 100-year floodplain that would meet the purpose and need of the Preferred Alternative.

- Project 2 would include construction of a bypass road for Access Control Point #2. This project would include an addition of 13,100 square yards of asphalt.
- Project 4 would channelize approximately 2,400 linear feet (LF) of creek along Port Chicago Highway to ensure proper drainage and to prevent flooding during storm surges; therefore, improving conveyance of flood flows.
- Project 8 would include the construction of an exterior perimeter fence and road to provide security forces with the ability to drive the distance of the new fence line. This project would include installation of approximately 19,000 LF of proposed exterior perimeter fencing and 19,000 LF of associated dirt roadway. Project 8 would have no impact on existing hydrology or conveyance of flood flows.
- Project 9 would repair approximately 1.4 miles of an existing lead connection rail to the Union Pacific line. Old rail would be replaced in previously disturbed areas.

The improvements would provide a safer and more efficient way to receive ammunition from commercial rail systems. Project 9 would have no impact on existing hydrology or conveyance of flood flows.

- Project 10 includes construction of a 7,845 square feet Network Enterprise Center and communications connections across the Mission District. Project 10 would have no impact on existing hydrology or conveyance of flood flows.

In summary, the potential minor long-term impacts would be localized at projects sites, which are dispersed throughout the installation. Because these projects would result in minimal impacts to existing hydrology or conveyance of flood flows, measures are not needed to reduce impacts and there is no further consideration of relocating the projects outside the 100-year floodplain.

Assessment of Direct Impact to Wetlands

The Army has determined the proposed projects under the Preferred Alternative would occur within approximately 3.8 acres of wetlands. The project with the largest overlap of wetlands (2.2 acres) would be Project 8, which consists of the proposed perimeter road and associated fencing. The remaining projects overlap by less than 1 acre of wetlands total. A formal jurisdictional delineation would be required prior to permitting or impact assessment to wetlands and waters of the United States. Any impacts to wetlands require permitting through the Clean Water Act (CWA) Section 404 and State of California CWA Section 401. State of California requires no net loss of wetlands, and therefore, impacts to wetlands would be mitigated in compliance with these requirements. The Army would mitigate through habitat restoration at MOTCO. Any additional or unforeseeable mitigation or considerations may be addressed during the permitting process.

Minimization of Impact from the Proposed Action

The Proposed Action would minimally impact existing hydrology or conveyance of flood flows, and wetlands for reasons stated above, and further described in the EA. EO 11988 states 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. Under the Proposed Action, design, construction, and maintenance activities would be implemented in accordance with permit requirements, stormwater pollution prevention plans, Best Management Practices, and include Low Impact Development measures as appropriate to reduce the potential for adverse impacts on the 100-year floodplain and areas downstream.

4.0 Finding

Following an evaluation of the impacts associated with the Proposed Action and the impacts of alternatives to implement the Proposed Action, I find there is no practicable alternative to the Proposed Action located outside of the floodplain. Furthermore, pursuant to EO 11988 and EO 11990, and as described above, the Army will take all practicable measures to minimize impacts associated with the Proposed Action to and within the floodplain.

Date

James M. Smith
Major General
Commanding General (Acting)
U.S. Army Installation Management Command