

DEPARTMENT OF DEFENSE
UNITED STATES ARMY
FINDING OF NO PRACTICABLE ALTERNATIVE FOR
RAIL CURVES BID PACKAGES 2 AND 4 PROJECT AT
MILITARY OCEAN TERMINAL CONCORD (MOTCO)

1.0 INTRODUCTION

Military Ocean Terminal Concord (MOTCO) is in Contra Costa County 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 that accounts for majority of the Department of Defense (DoD) West Coast ammunition handling. 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 composed of 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 piers and an Army-owned rail system that connects with two major commercial rail lines.

Executive Order (EO) 11988, Floodplain Management, requires each agency provide leadership and shall take action to reduce the risk of flood loss, to minimize the impact of floods on human safety, health and welfare, and to restore and preserve the natural and beneficial values served by floodplains in carrying out its responsibilities for (1) acquiring, managing, and disposing of Federal lands, and facilities; (2) providing Federally undertaken, financed, or assisted construction and improvements; and (3) conducting Federal activities and programs affecting land use, including but not limited to water and related land resources planning, regulating, and licensing activities.

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.”

This notice is to fulfil the public notice requirements under Executive Order (EO) 11988, Floodplain Management and EO 11990, Protection of Wetlands.

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 Rail Curves Bid Packages 2 and 4 Project would maximize efficiency to meet current and future cargo handling mission requirements through the realignment, replacement, and demolition of several rail curves at MOTCO.

2.2 Alternatives Considered

In accordance with the National Environmental Policy Act (NEPA) and 32 CFR 651, feasible alternatives for implementing the Proposed Action, including a No Action Alternative, were considered. 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 Explosives 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 Floodplains and Wetlands

Based on field observations, USACE Sacramento District determined a palustrine emergent non-jurisdictional, freshwater wetland (33 CFR 328.3) exists within the project area (based on USACE wetland delineation manual guidance). The project is also within the 100-year floodplain. Construction of the project will result in permanent wetland impact of 0.06 acres and 68 cubic yards of fill. There are no temporary impacts anticipated.

Under the Proposed Action, the Army will 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 floodplains and wetlands as practicable. Due to operational requirements, it was determined that complete avoidance of floodplains and wetlands were 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 and floodplains; however, the Army will ensure that all practicable measures to minimize impacts are incorporated into the Proposed Action.

Date

James M. Smith,
Major General, USA
Commanding

References:

EO 11988, *Floodplain Management*, 24 May 1977.

EO 11990, *Protection of Wetlands*, 25 May 1977.

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