

**DRAFT FINDING OF NO PRACTICABLE ALTERNATIVE
PROGRAMMATIC ENVIRONMENTAL ASSESSMENT FOR THE FIELDING OF THE
MANEUVER - SHORT RANGE AIR DEFENSE CAPABILITY**

Prepared by

**UNITED STATES ARMY ENVIRONMENTAL COMMAND
JOINT BASE SAN ANTONIO - FORT SAM HOUSTON**



May 2021

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DEPARTMENT OF DEFENSE

UNITED STATES ARMY

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1.0 Introduction

Maneuvering formations require air defense capabilities to counter air threats. The Chief of Staff of the Army directed an effort to improve the Air Defense Artillery (ADA) capability to protect the maneuver force and field four battalions of the Maneuver Short-Range Air Defense (M-SHORAD) capability. The M-SHORAD capability and the associated ADA battalions are being activated to provide improved air defense to the maneuver commander. In line with these efforts, the Department of the Army (Army) plans to field¹³⁹ M-SHORAD battalions to enhance the defensive capability of divisions against aerial threats.

The Army is assessing six installations: Fort Bliss, Fort Hood, Fort Riley, Fort Stewart, Fort Carson, and Fort Sill. These potential fielding locations meet specific screening criteria to support the M-SHORAD battalion. The Army proposes to implement construction modernization and infrastructure improvement projects identified in the Programmatic Environmental Assessment (PEA) for the Fielding of the M-SHORAD. Of the six installations assessed, Fort Riley and Fort Stewart have potential wetlands or floodplain impacts.

The Army determined that elements of the proposed action may be located within portions of the 100-year flood plain and wetlands on Fort Riley and Fort Stewart. Under Executive Order (EO) 11988, Floodplain Management, the Army must find that there is no practicable alternative to development within the 100-year floodplain. Under EO 11990, Protection of Wetlands, federal agencies must avoid undertaking new construction located in wetlands unless the head of the agency finds that there is no practicable alternative to such construction. Further, the Army must take all practicable measures to minimize harm to or within floodplains and wetlands.

This preliminary finding incorporates the analysis and conclusions of the May 2021 Programmatic Environmental Assessment for the Fielding of the Maneuver - Short Range Air

¹³⁹ “Field” refers to sending new equipment and technology to installations. As part of the fielding action, Soldiers will be stationed at an installation to train with and maintain the M-SHORAD capability.

DRAFT

Defense Capability. This finding along with the PEA are available for public comment, in accordance with both EOs.

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. The 100-year floodplain is defined as an area adjacent to a water body that has a 1 percent or greater chance of inundation in any given year. The Army has determined that certain facilities and infrastructure proposed in the PEA may necessitate development in the 100-year floodplain on Fort Stewart.

EO 11990 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.” The Army has determined that certain facilities and infrastructure proposed in the PEA may necessitate development in wetlands on Fort Riley and Fort Stewart.

At Fort Riley, a training range may be constructed in an area known to contain wetlands but not floodplains. At Fort Stewart, cantonment construction may occur near Mill Creek and range construction may occur near the Canoochee River. Both wetlands and floodplains may be impacted by the construction at Fort Stewart. Development can impact these natural resources via the loss or degradation of their natural functional benefits such as water storage, infiltration, and filtration. These impacts extend to the intrinsic value of these resources or the benefits associated with their use, such as wildlife habitat, recreation, and aesthetic enjoyment. Floodplain and wetland functions and values are also susceptible to changes in the volume, rate, and quality of stormwater discharge, particularly as influenced by the amount of impervious surface within a watershed.

Publication in the Federal Register of the Notice of Availability (NOA) for the PEA commences a 30-day public review period. The notice also states that the 30-day public review period applies to this draft Finding of No Practicable Alternative (FONPA). Written comments on the draft FONPA may be submitted to U.S. Army Environmental Command, ATTN: M-SHORAD Public Comments, 2455 Reynolds Rd Mail Stop 112, JBSA-Fort Sam Houston, Texas 78234-7588 or email comments to usarmy.jbsa.aec.nepa@mail.mil with the subject line M-SHORAD Public Comment. The U.S. Army Environmental Command has also established a webpage that contains a draft FONPA at <https://aec.army.mil/index.php?CID=352>. If you cannot access the

DRAFT

draft FONPA online, please submit a request to USAEC Public Affairs Office at usarmy.jbsa.aec.mbx@mail.mil, by mail to U.S. Army Environmental Command, ATTN: Public Affairs, 2455 Reynolds Rd Mail Stop 112, JBSA-Fort Sam Houston, Texas 78234-7588, or by phone at 443-243-0313, 210-792-6683, or toll-free at 855-846-3940 so materials can be sent to you.

3.0 Description of the Proposed Action and Discussion of Alternatives

The proposed action is to field the M-SHORAD battalion to three of the six assessed installations. Fielding may require new or updated facilities and infrastructure to support the battalion.

Alternatives Selection Criteria

The practicability of a given alternative is evaluated by considering pertinent factors such as community welfare, environmental impact, and feasibility in light of the overall project purpose and need. The Army developed screening criteria to assess whether an alternative would meet its purpose and need and, therefore, could be considered reasonable. These criteria were used to evaluate a range of reasonable alternatives, as follows:

1. Installations must have an Armor Brigade Combat Team (ABCT) or a Stryker Brigade Combat Team (SBCT) present or provide initial training for M-SHORAD-assigned soldiers.
2. Adequate maneuver space is available to support the minimum requirements for the M-SHORAD battalion training as designated in authoritative Army training documents.
3. Adequate live-fire ranges are available to support the minimum requirements for the M-SHORAD crew certification and training as designated in authoritative Army training documents. The training requirements can be met on existing ranges, new ranges under construction or planned, or through selective scheduling as facilitated by the Sustainable Readiness Model or Regionally Aligned Readiness and Modernization Model. In addition, certain live-fire training may be accomplished through appropriate simulations.
4. Adequate protected airspace of lateral and vertical extent. However, institutional training sites will not require the full amount of airspace as student training will provide basic abilities that will be honed at the M-SHORAD battalion.
5. Adequate cantonment facilities for administrative, maintenance, motor pool, housing, and personnel support.

DRAFT

Alternatives Considered and Dismissed

Fielding, stationing, training, and maintaining the M-SHORAD capability at U.S. Army Garrison Hawaii was not carried forward for further analysis because the installation does not currently have an ABCT, SBCT, or a specific training mission for the M-SHORAD capability.

Also not carried forward was an alternative to field the M-SHORAD capability to installations at which the unit could be accommodated within existing infrastructure and training could be accomplished with minimal constraints on activity, time, and space:

Activity – An installation can accommodate 75 percent (three out of four) of the required live-fire training events of the M-SHORAD mounted weapons on the primary range type designated in TC 25-8. This means that one out of four (25 percent) of M-SHORAD weapons systems would require simulation, completion on an alternate range type as designated in TC 25-8, or deployment to another installation to complete required live-fire training.

Time – Non-availability, delays, or interruptions of maneuver space or live-fire ranges of no more than 2 weeks per year.

Space – Training done in a contiguous area with only existing buffer zones to avoid protected resources.¹⁴⁰

Alternatives Subject to Further Analysis

Based on the selection criteria, a Proposed Action and No Action Alternative were selected for detailed analysis.

No Action Alternative

Under the No Action Alternative, the M-SHORAD would not be fielded or stationed at any installation; the Army would continue training per current requirements. This would not meet the objective of the Chief of Staff of the Army and leave Army ABCT and SBCT maneuver units without the desired air defense capability.

Proposed Action

To enhance live-fire training, Fort Riley has been planning to construct a new range and has a proposed location approved by the installation's leadership. The M-SHORAD and other systems would complete training events on the new range. The minimum Army standard for this range is greater than 500 acres. All live-fire ranges must be located where the potential dangers from ordnance discharge are contained within controlled, restricted areas linked to an impact area to avoid danger to non-participants. To meet this requirement, Fort Riley intends to construct the new range in an area designated and used for training to the north of the cantonment area and on

¹⁴⁰ Protected resources include cultural, wetland, migratory birds, and threatened and endangered species.

DRAFT

the northwest side of an impact area. It must be oriented with the range control facilities on the perimeter and all live firing directed into an impact area. Construction of the range would be in an area known to contain wetlands but not floodplains. A review of the National Wetlands Inventory map shows numerous riverine wetlands throughout all areas meeting the safety requirement. No other site meeting the size and orientation requirements of the new range and avoiding wetlands exists on Fort Riley. Therefore, there is no practicable alternative to the proposed site. The proposed area is the most suitable because it provides the least amount of interference with the existing live-fire ranges and maneuver areas. While the proposed area contains wetlands, construction of the range facilities would be outside of delineated wetlands as much as possible to minimize impacts to the resource.

Fort Stewart has a future stationing capacity build-out plan should new cantonment construction funding become available for M-SHORAD support facilities near 6th Street, 15th Street, and Mill Creek. A review of the National Wetlands Inventory map shows numerous freshwater forested/shrub wetlands surrounding and interspersed throughout the entire cantonment area of Fort Stewart. Also, reviewing the Federal Emergency Management Agency (FEMA) National Flood Hazard Layer map shows floodplains surrounding and interspersed throughout the cantonment area. Avoiding impacts to wetlands and floodplains during construction of facilities to support the M-SHORAD battalion is not practicable. Efforts to avoid and minimize sensitive environmental resources were implemented during the capacity planning process. It is anticipated that additional effort to avoid and minimize impacts would be accomplished through the design process of each garrison facility.

Fort Stewart's live-fire ranges must be sited in locations where the dangers from ordnance discharge are contained within controlled, restricted areas to avoid harm to non-participants. Fort Stewart has identified potential locations to construct two new ranges. The M-SHORAD and other systems would complete training events on the new ranges. All areas at Fort Stewart meeting safety standards and suitable for the construction of live-fire ranges contain a substantial amount of freshwater forested/shrub and freshwater emergent wetlands as depicted in the National Wetlands Inventory. There are also extensive areas of floodplains subject to a 1% annual chance of flooding as depicted on FEMA Flood Insurance Rate Maps. Any potential site that meets the required safety standards will impact wetlands or floodplains and avoidance is not practicable at Fort Stewart. Potential construction sites for the two new ranges are in the north-central part of the training area east of Route 119 and south of Highway 280, which lie north of but near the Canoochee River. It is standard practice on Fort Stewart that all proposed range projects are sited to avoid and minimize environmental resource impacts to the greatest extent practicable. The selected locations are required because they would minimize interference with other existing training ranges and maneuver areas.

4.0 Finding

During development of the PEA, the Army sought ways to site the needed facilities entirely outside of floodplains and wetlands while still addressing the M-SHORAD battalion operational and safety requirements. All available areas for construction of the cantonment and range facilities at Fort Stewart and range facilities at Fort Riley contain wetlands or floodplains. Due to mission-related factors, such as lack of developable space and compliance with Army facility requirements, it was determined that no practicable alternatives exist that avoid development within floodplains or wetlands on Fort Riley and Fort Stewart.

Following a thorough evaluation of alternate plans that would satisfy the purpose and need for Proposed Action, I find that there is no practicable alternative to siting elements of the Proposed Action entirely outside of floodplains and wetlands at Fort Riley and Fort Stewart. Therefore, the Army will ensure that all practicable measures to minimize impacts to and within the floodplain environment and to minimize harm to wetlands are incorporated into the Proposed Action.

Date

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