DEPARTMENT OF DEFENSE

UNITED STATES ARMY GARRISON, FORT MOORE

PROGRAMMATIC FINDING OF NO PRACTICABLE ALTERNATIVE (PFONPA) FOR ROUTINE ARMY ACTIONS OCCURRING WITHIN THE 100-YEAR FLOODPLAINS OR WETLANDS ON FORT MOORE AND CAMP MERRILL
JUNE 2023

1.0 Introduction

The U.S. Army Garrison, Fort Moore, is an approximately 182,000-acre Installation located in west-central Georgia and east-central Alabama. Approximately 170,000 acres are in Chattahoochee and Muscogee Counties, Georgia and 12,000 acres are in Russell County, Alabama. The Chattahoochee River separates Fort Moore, Georgia from Alabama. Likewise, the Upatoi Creek separates Muscogee and Chattahoochee Counties on Fort Moore, Georgia.

The majority of Fort Moore drains to the Chattahoochee River, which flows through approximately 15 miles of Fort Moore. Upatoi Creek (Georgia) and Uchee Creek (Alabama) are the main tributaries of the Chattahoochee River, whereas upland areas to the north and northwest drain to Upatoi Creek before discharge into the Chattahoochee River. A small southeastern portion of Fort Moore drains to the Flint River. Floodplains and wetlands have been identified throughout Fort Moore. Figure 1, titled Fort Moore Wetlands and Surface Waters depicts the major stream systems.

Camp Frank D. Merrill (herein after Camp Merrill) is in North Georgia, Lumpkin County, about 184 miles from Fort Moore. Camp Merrill is a Satellite Area of Fort Moore on approximately 282-acres. The federal property was previously managed by the Department of Agriculture, U. S. Forest Service but is now managed by the U.S. Army through a land swap that occurred in October 2015. The Etowah River arises out of north Georgia mountains in Lumpkin County and flows through Camp Merrill from north to south along the east side of Mosby Airfield toward the south end of the property. Wetlands have been identified on Camp Merrill along the Etowah River as reflected in Figure 3, Camp Merrill Wetlands and Surface Waters.

Executive Order (EO) 11988, *Floodplain Management*, requires federal agencies to determine whether a proposed action will 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. EO 11988 *Floodplain Management* was amended by EO 13690, *Establishing a Federal Flood Risk Management Standard and a Process for Further Soliciting and Considering Stakeholder Input.*

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 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."

EO 11988 as amended by EO 13690, and EO 11990 state that agencies shall "provide opportunity for early public review of any plans or proposals for actions in floodplains and wetlands". This PFONPA is made available for public review and comment for 15-days.

Routine Army actions occurring within the 100-year floodplains or wetlands on Fort Moore and Camp Merrill that would be covered under this PFONPA include those that do not, individually, or cumulatively, have the potential to cause significant effects on the environment. These actions typically qualify for a Categorical Exclusion (CX) under *32 Code of Federal Regulations (CFR) Part 651* (Environmental Analysis of Army Actions) and do not require further environmental analysis in either an Environmental Assessment (EA) or an Environmental Impact Statement (EIS) in accordance with the National Environmental Policy Act (NEPA). However, compliance with all other requirements related to the project proposal, including requirements for permits and state regulatory agency review of the plans, is necessary.

The Notice of Availability (NOA) was published in The Journal (formerly Tri-County Journal) and the Dahlonega Nugget on August 9, 2023. The NOA was published in The Citizen of East Alabama on August 10, 2023, and in the Columbus Ledger-Enquirer on August 10, 11, and 13, 2023. The NOA and PFONPA were also posted on the Fort Moore website from August 9, 2023 through August 24, 2023 at https://www.moore.army.mil/Garrison/DPW/EMD/Legal.html.

2.0 Proposed Action

Fort Moore and Camp Merrill proposes to implement a PFONPA from which to tier activities as identified in this Section 2.0 for routine and ongoing actions that impact wetlands and floodplains on Fort Moore (Georgia and Alabama) and Camp Merrill (Georgia).

To reduce the amount of time and resources required to approve individual project FONPAs, Fort Moore proposes the following activities that qualify as a CX., are of such a nature that their occurrence would cause little to no impact on the floodplain or the wetland as it currently exists. Consequently, development of a FONPA for each occurrence will not be required. The activities covered under this PFONPA include the following:

a. Interior renovations/repairs/maintenance to existing facilities and infrastructure (minor or substantial) where substantial damage is not anticipated, potential impacts due to flooding would be minimal, and flood proofing measures will be implemented.

b. Exterior renovation/repairs to existing facilities and infrastructure (minor or substantial) where substantial damage is not anticipated, potential impacts due to flooding would be minimal, and flood proofing measures will be implemented. Examples include, but are not limited to, routine maintenance of buildings, parking lots, sidewalks, bridges, etc.

c. General land maintenance and repairs that do not increase the amount of impervious material

within a watershed (e.g., ITAM actions, firebreak maintenance, tree removal, mowing, landscaping, forestry activities, conservation activities, pest management, etc.) and where potential downstream impacts due to flooding are not anticipated.

d. Demolition of existing facilities or infrastructure where standard demolition practices would be applied to control sedimentation and erosion during demolition.

e. Upgrades to existing utilities and/or installation of new utilities where substantial damage to the utility is not anticipated, potential impacts due to flooding would be minimal, and flood proofing measures will be implemented.

f. Repairs to existing roadways, training roads, tank roads/turning pads, and tank trails.

g. New construction where impacts do not cause a change in topography (e.g., low water crossings, pole structures, sidewalks, physical training equipment, temporary structures such as sheds, etc.) and where repairs to such structures due to flooding would not be substantial.

h. New construction projects occurring outside of the floodplain or wetland that may cause erosion and runoff but do not adversely impact the floodplain and/or wetland.

i. Streambank and shoreline stabilization including lakes, ponds, creeks, streams, and rivers in accordance with Clean Water Act requirements.

j. Restoration or replacement of existing bridges, railroad, water crossing structures, dams, small boat ramps/launches, and/or small piers to pre-existing conditions or purpose in accordance with the Clean Water Act requirements. This could include patchwork, replacing damaged sections of a structure in disrepair, upgrading to meet current safety standards, or partial to complete replacement.

k. Erosion control, culvert (of similar or larger diameter), and/or storm collection systems restoration or replacement in accordance with Clean Water Act requirements.

l. Debris and sediment removal from waterways and water access points in accordance with federal and state requirements.

m. Natural resources activities including establishing and maintaining food plots, prescribed burning, wildfire response, and land regeneration activities.

n. Water and land access projects that include ditch, stream, and river crossings, ramps, and selective tree removal to provide access to previously inaccessible locations including unimproved access roads, trails, and/or paths.

2.1 Exclusions

Proposed actions excluded from this PFONPA are those actions that cannot be categorically excluded resulting in the requirement to prepare an EA or EIS. As a result, a separate FONPA will

be prepared for those activities concurrently with the preparation of the EA or EIS and in accordance with the requirements of EO 11988 as amended, and 11990.

3.0 Impacts and Mitigation Measures

3.1 100-Year Floodplain

EO 11988 as amended, 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.

a. Cumulatively, Fort Moore has approximately 18,800 acres within the 100-year floodplain (INRMP 2022). As seen in the attached Figure 2, floodplains are linked to adjacent streams and rivers. Floodplain areas are associated with the Upatoi Creek, Uchee Creek, Randall Creek, and Pine Knot Creek, among others. The Chattahoochee River floodplain, and its associated backwaters and tupelo swamps, is found in the southwestern portion of the Installation.

b. There is approximately 6,000 feet of Etowah River on Camp Merrill (INRMP 2022). According to the *Federal Emergency Management Agency* (*FEMA) Flood Zones Map (Flood Insurance Rate Map),* Camp Merrill is in a Zone D. This Zone D means the property has not been quantified and is defined as an area of undetermined flood hazard. Accordingly, there is no Figure attached to this PFONPA for Camp Merrill with a 100-Year Floodplain.

3.2 Wetlands

Fort Moore wetlands include impounded water, flowing water, river floodplains, streams, stream floodplains, small stream swamps, wooded seepage bogs, herbaceous and shrub seepage bogs, and gum/oak ponds (INRMP 2022).

a. Cumulatively, Fort Moore has approximately 16,900 acres of wetlands (INRMP 2022). Wetlands are depicted in Figure 1, titled Fort Moore Wetlands and Surface Waters. Wetlands can be seen in a few locations dispersed on the cantonment areas; however, majority of the wetlands are in training areas on the north-western, south-eastern, and the southern area of the Installation.

b. The Etowah River runs through Camp Merrill and is approximately 6,000 feet (INRMP 2022). The wetlands generally follow the Etowah River and can be seen in Figure 3 titled, Camp Merrill Wetlands and Surface Waters.

4.0 Mitigation and Regulatory Compliance

Under any Proposed Action, Fort Moore and Camp Merrill would incorporate mitigation and Best Management Practices (BMPs), whereas appropriate, throughout the planning and design, construction, and operation and maintenance phases to reduce the potential for adverse impacts on the 100-year floodplain and wetlands as described below:

a. The request for site-specific environmental analysis on all potential Installation level actions are submitted to the Environmental Management Division (EMD), within the Directorate of Public Works (DPW), using the Form 144 Request (144R) to initiate the environmental review (NEPA process) prior to the decision to implement. An interdisciplinary team of environmental scientists, biologists, planners, natural resource wetland specialists, and engineers review Proposed Actions, evaluates their potential impacts, and provides applicable comments (i.e., guidance, mitigation, restrictions, etc.). Permission to proceed or denial of a proposed action is returned to the proponent with applicable guidance as a Record of Environmental Consideration (REC) or notification that a higher level of NEPA analysis (i.e., Environmental Assessment [EA] or Environmental Impact Statement [EIS]) is required. As a result of the 144R process, projects with the potential to impact floodplains and wetlands are identified and pertinent mitigation of potential impacts are outlined as a condition of approval.

b. Floodplain and Wetland Mitigation: Through the DoD Form 1391, the Form 144 Request process, and a variety of project specific coordination efforts among Garrison personnel; project requirements and potential mitigation methods are identified early in an action's planning phase. In accordance with a 1990 Memorandum of Agreement between the Environmental Protection Agency and the Army regarding Mitigation under CWA Section 404(b)(1), the following mitigation types and their sequential application would be integrated as applicable to each proposed project involving the disturbance of floodplains and wetlands:

- Avoidance is described as site specific mitigation by selecting to avoid the creation impacts from the outset. These may include spatial placement or timing of an action to avoid new disturbances.
- Minimization is site specific mitigation that reduces the severity of an action's impact. Effective minimization is often accomplished through the incorporation of appropriate and practicable project design and risk avoidance measures.
- Compensatory mitigation occurs through replacing or augmenting substitute resources after avoidance and minimization measures have been instituted. It is achieved through appropriate and practicable restoration, establishment, enhancement, and/or preservation of resource functions and services.

c. Regulatory Compliance: Installations are required to maintain local, state, and federal compliance for actions with the potential to impact local waters. The Georgia Department of Natural Resources (GADNR) Environmental Protection Division (EPD) issues National Pollutant Discharge Elimination System (NPDES) construction permits in accordance with the Clean Water Act (CWA). In Georgia, construction projects that disturb one acre of land or greater require a State-approved Erosion, Sedimentation, and Pollution Control Plan (ESPCP) to meet the requirements of the Federal NPDES construction permit program and Georgia Erosion and Sedimentation Control Act. The ESPCP identifies BMPs (e.g., silt fences, etc.) and how to limit soil erosion and sedimentation from the site. Preventing soil erosion or sedimentation ensures new development outside the floodplain and/or wetland improves and preserves stream quality, as well as managing runoff quantity. When work within the floodplain or wetland is unavoidable, minimization measures and establishment of site-specific erosion control BMPs are implemented when working with these sensitive resources. Inspections are conducted to monitor progress to ensure minimization and mitigation measures are functioning properly.

d. Permitting: When work within the 100-year floodplain or wetland is unavoidable, Fort Moore and/or Camp Merrill would comply with the Clean Water Act (CWA) by obtaining a Section 404/401 permit from the U. S. Army Corps of Engineers (USACE) prior to disturbing jurisdictional wetlands. This permitting process would establish appropriate mitigation requirements to reduce impacts. Mitigation may include impact avoidance measures, impact minimization measures, or compensatory mitigation (e.g., purchase of mitigation bank credits or In-Lieu Fee program credits, etc.,), among others to reduce impacts.

Taken together, these measures would avoid or minimize the loss of and impacts to the floodplains and wetland resources on Fort Moore and Camp Merrill. These measures represent all practicable measures to minimize harm to floodplains and wetlands.

5.0 Finding of No Practicable Alternative

During development of the Proposed Action, the Fort Moore Environmental Management Division worked proactively to ensure the purpose and need of the Proposed Action is met and will avoid as many potential impacts to floodplains and wetlands as practicable. Due to operational requirements, if it's determined that complete avoidance of floodplains and/or wetlands is not feasible in the Proposed Action, the potential impacts will be minimized to the greatest degree practicable while also achieving the desired results.

Date

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Deputy Assistant Secretary of the Army
Installations, Housing & Partnerships

Attachments:
Figure 1. Fort Moore Wetlands and Surface Waters
Figure 2. Camp Merrill Wetlands and Surface Waters
Figure 3. Fort Moore 100-Year Floodplains

References Cited:
EO 11988 as amended by EO 13690
EO 11990
32 CFR Part 651
Integrated Natural Resources Management Plan (INRMP) 2022
FEMA. National Flood Hazard Layer. https://www.fema.gov/national-flood-hazard-layer-nfhl

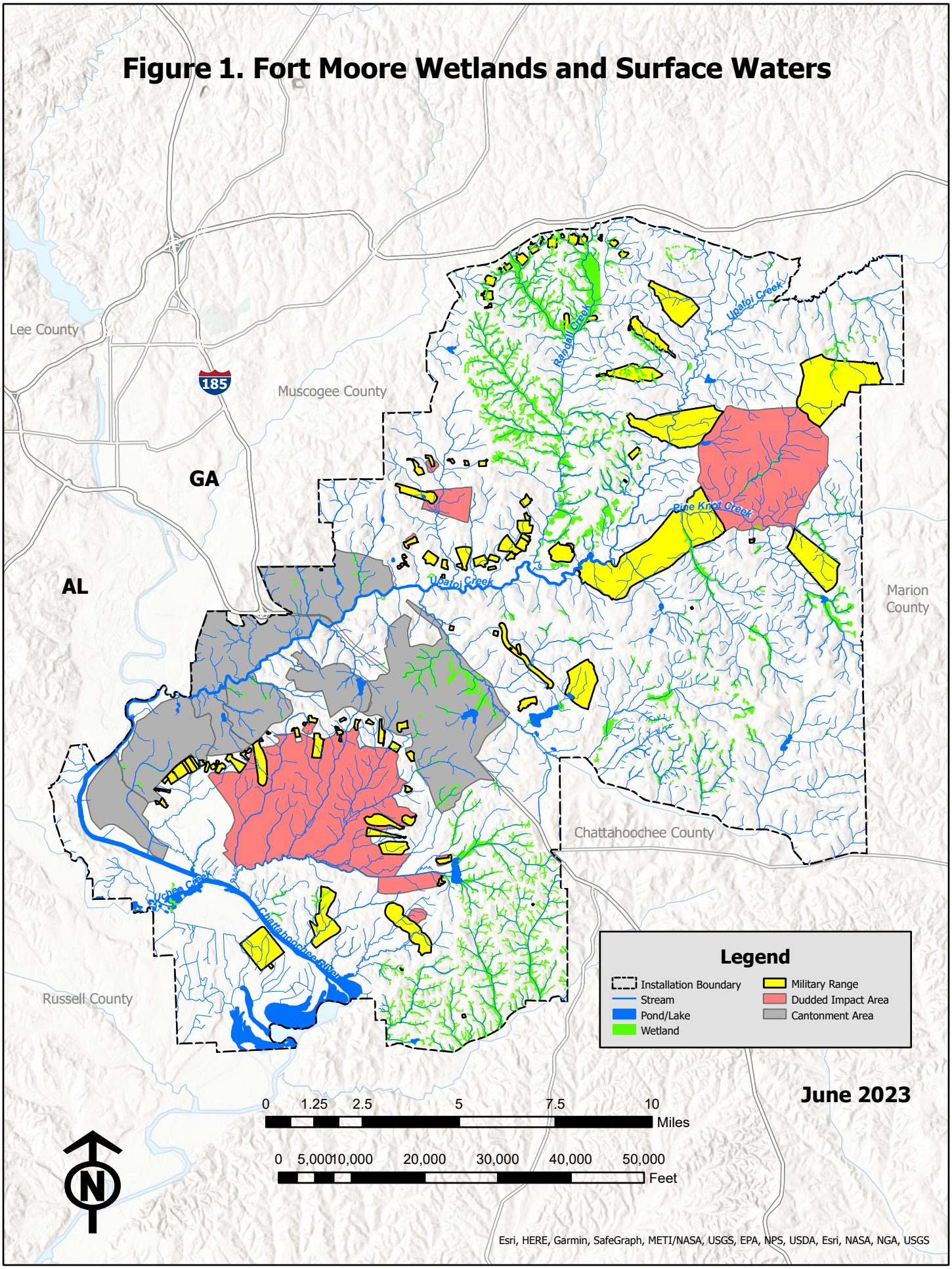
Figure 1. Fort Moore Wetlands and Surface Waters
Lee County
Muscogee County
GA
AL
Marion County
Chattahoochee County
Russell County
185
Upatoi Creek
Randall Creek
Pine Knot Creek
Uchee Creek
Chattahoochee River
Legend
Installation Boundary
Stream
Pond/Lake
Wetland
Military Range
Dudded Impact Area
Cantonment Area
June 2023
0 1.25 2.5 5 7.5 10
Miles
0 5,000 10,000 20,000 30,000 40,000 50,000
Feet
N
Esri, HERE, Garmin, SafeGraph, METI/NASA, USGS, EPA, NPS, USDA, Esri, NASA, NGA, USGS

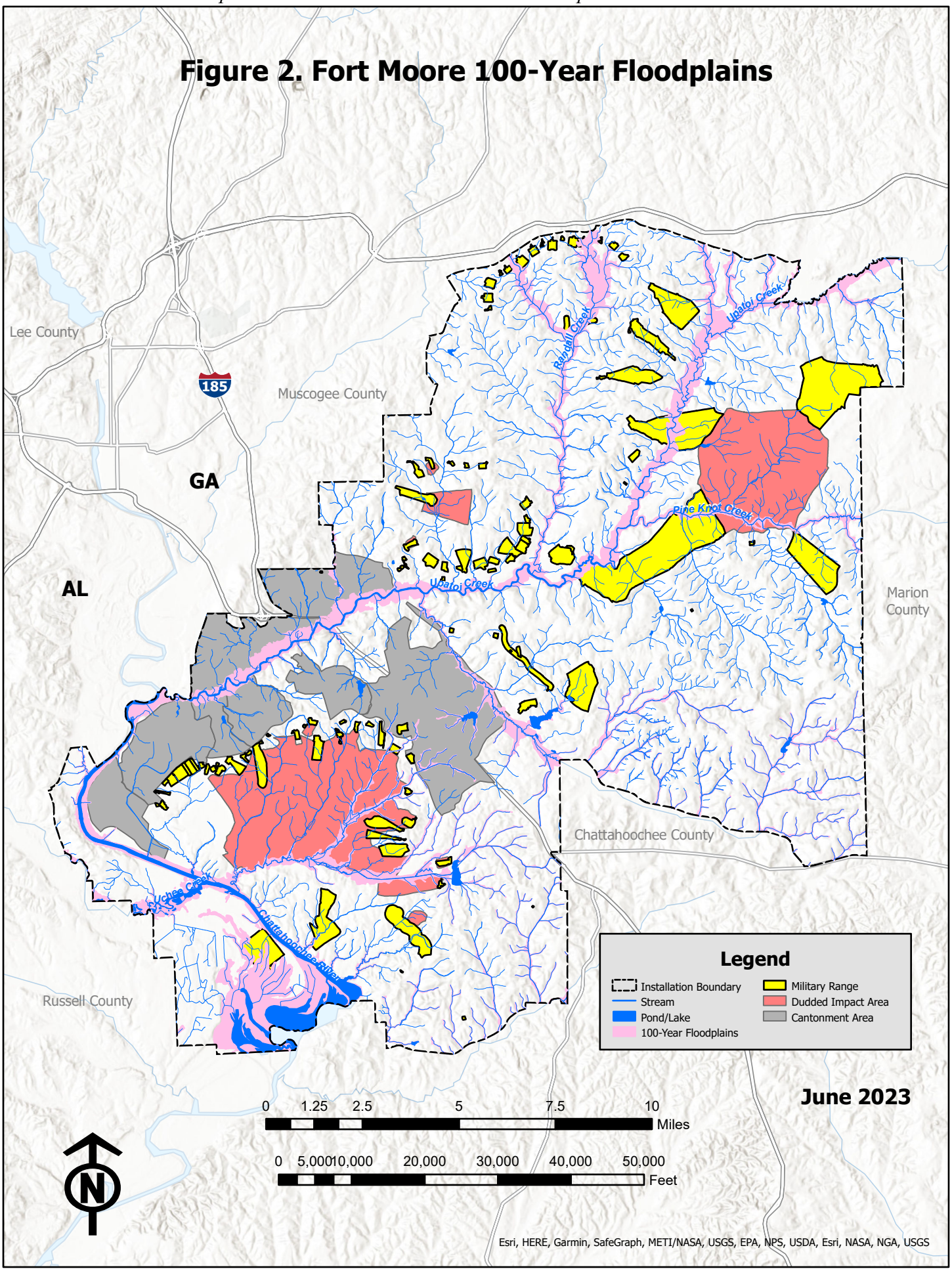
Figure 2. Fort Moore 100-Year Floodplains
Lee County
185
Muscogee County
GA
AL
Randall Creek
Upatoi Creek
Pine Knot Creek
Upatoi Creek
Marion County
Chattahoochee County
Uchee Creek
Chattahoochee River
Russell County
Legend
Installation Boundary
Stream
Pond/Lake
100-Year Floodplains
Military Range
Dudded Impact Area
Cantonment Area
June 2023
0 1.25 2.5 5 7.5 10
Miles
0 5,000 10,000 20,000 30,000 40,000 50,000
Feet
N
Esri, HERE, Garmin, SafeGraph, METI/NASA, USGS, EPA, NPS, USDA, Esri, NASA, NGA, USGS

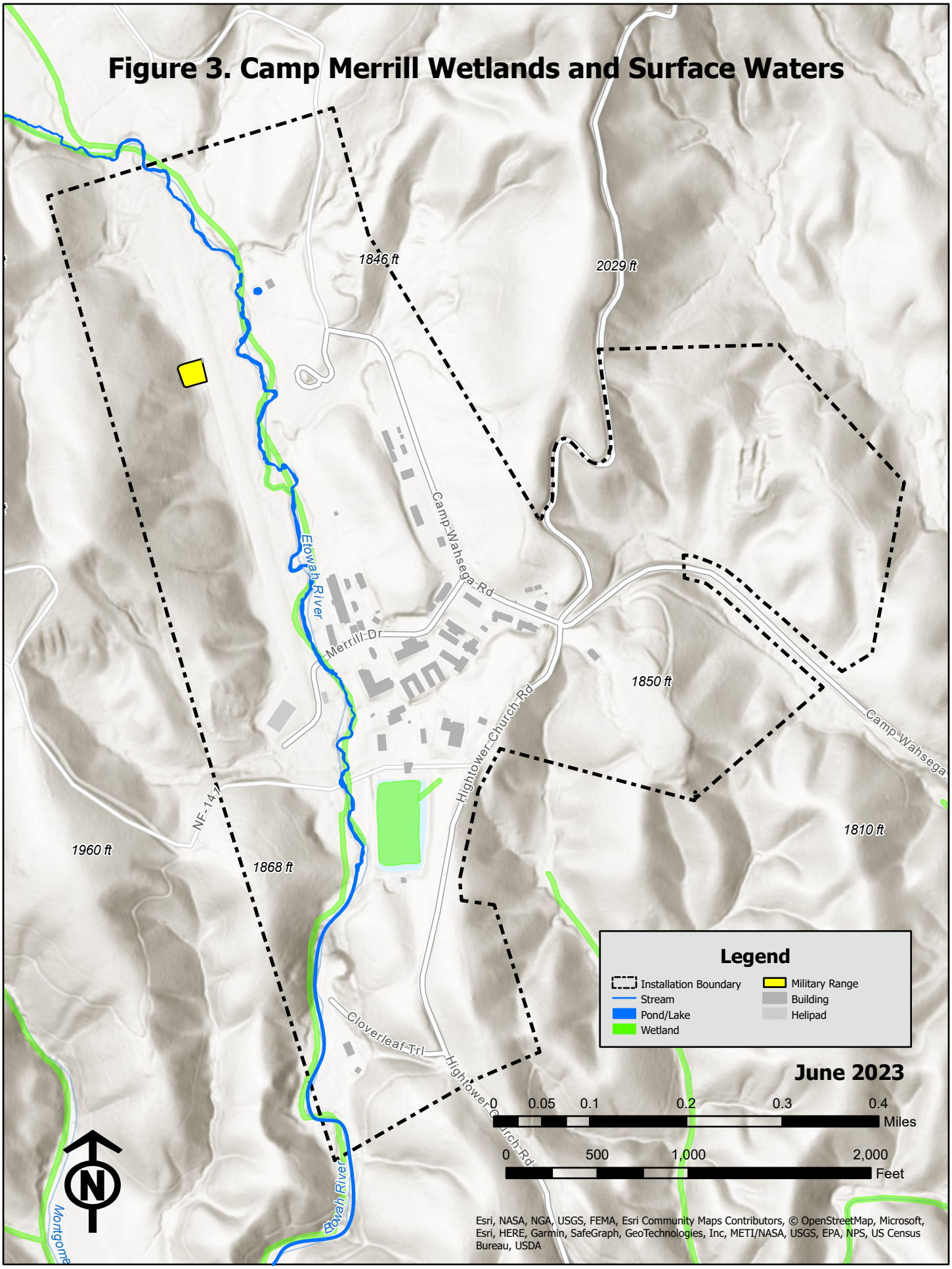
Figure 3. Camp Merrill Wetlands and Surface Waters
1846 ft
2029 ft
1850 ft
1810 ft
1960 ft
1868 ft
Camp Wahsega Rd
Merrill Dr
Etowah River
Hightower Church Rd
NF-141
Cloverleaf Trl
Legend
Installation Boundary
Stream
Pond/Lake
Wetland
Military Range
Building
Helipad
June 2023
0 0.05 0.1 0.2 0.3 0.4
Miles
0 500 1,000 2,000
Feet
N
Esri, NASA, NGA, USGS, FEMA, Esri Community Maps Contributors, © OpenStreetMap, Microsoft, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, US Census Bureau, USDA