## DEPARTMENT OF DEFENSE UNITED STATES ARMY FINDING OF NO PRACTICABLE ALTERNATIVE FOR REPAIRS TO CLEANING AND FINISHING FACILITY ANNISTON ARMY DEPOT, ALABAMA

1. Introduction. The Department of the Army (Army) proposes to repair an existing cleaning and finishing facility (Building 433) at the Anniston Army Depot (ANAD). Pursuant to Executive Order (EO) 11988, *Floodplain Management,* the Army must evaluate whether there is a practicable alternative to locating the proposed action in a floodplain. 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, the Army must design or modify its action to minimize harm to or within the floodplain. Thereafter, the Army must prepare and circulate a notice containing an explanation of why the action is proposed to be in the floodplain.

The Army has determined elements of this proposed action must be located within the 100-year floodplain. Therefore, this Draft Finding of No Practicable Alternative (FONPA) addresses EO 11988, *Floodplain Management*.

**2.** Notice of Floodplain Involvement. 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. The Army has determined the proposed repair project under the Proposed Action is required to be completed within the 100-year floodplain.

Repairs of the existing cleaning and finishing facility (Building 433) on ANAD will occur within the 100-year floodplain. A Record of Environmental Consideration (REC) was prepared to document potential environmental impacts and no significant impacts to the environment are anticipated. Publication of the Notice of Availability (NOA) for this draft FONPA will be initiate a 15-day public comment and review period.

3. Description of the Proposed Action, Wetlands Impacts, and Minimization. The Army proposes to repair an existing cleaning and finishing facility (Building 433) at the Anniston Army Depot (ANAD). The proposed action is for repairs to an existing ANAD structure and not new construction. These repair activities are routine facility improvements to enhance the efficiency and readiness for the cleaning and finishing operations at ANAD. The proposed action to repair Building 433 include repairs to exterior and interior walls, roof repairs, internal ventilation system, improved lighting, repair of overhead access doors, repairs to the facility electrical and fire alarms system, and repairs to common breakrooms and administrative office spaces. Moreover, the repairs to

Building 433 will not affect land use within the floodplain and there will be no anticipated disturbance to natural vegetation or sediment during the course of the repairs. Under the Proposed Action, these repairs would reinforce capabilities to support ANAD's mission, promote quality of life, and enhance sustainability and environmental viability on the installation without negative impact to the floodplain.

4. Assessment of Direct Impact to 100-Year Floodplain. Under the proposed action, the repair activities associated with Building 433 located on ANAD will be occurring within the 100-year floodplain but would not result in an increase in footprint size of the structure or result in additional environmental impact within the floodplain. Therefore, the proposed action would minimally impact the existing hydrology or conveyance of flood flows within the 100-year floodplain and would comply with EO 11988.

The Army evaluated the proposed action and determined that there would be no practicable alternatives to make these repairs outside the 100-year floodplain that would meet the project purpose. The Army sought ways to site projects entirely outside of the floodplain while still addressing ANAD's need to address real property deficiencies and suboptimal conditions. Due to factors such as lack of developable space on ANAD, mission-critical need to update infrastructure deemed essential by the installation Master Plan, and the necessary avoidance of other critical resources such as cultural resources and hazardous wastes, it was determined that avoidance of floodplain was not practicable.

**5. Minimization of Impact from the Proposed Action.** The Proposed Action would minimally impact existing hydrology or conveyance of flood flows, for reasons stated above, and further described in the REC. 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, all repairs activities would be implemented in accordance with ANAD's current National Pollutant Discharge Elimination System (NPDES) permit, stormwater pollution prevention plans, and 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.

6. Public Availability. A Notice of Availability of the Draft FONPA and REC was published in the *Anniston Star* on April 27, 2022. A copy REC and Draft FONPA were available for review on the Internet at <a href="https://anad.army.mil/home/environmental/public-notices">https://anad.army.mil/home/environmental/public-notices</a>. Additionally, the information will be made available for review by contacting Mr. Regan Johnson at <a href="regan.e.johnson.civ@army.mil">regan.e.johnson.civ@army.mil</a> or 256-240-3486. The deadline for receipt of comments was May 11, 2022

7. **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 100-year floodplain. Furthermore, pursuant to EO 11988, and as described above, the Army will take all practicable measures to minimize impacts associated with the proposed action to and within the floodplain.

Deputy Assistant Secretary of the Army Installations, Housing & Partnerships Date

Attachments: Location Map of Proposed Action

## National Flood Hazard Layer FIRMette



## Legend



Basemap: USGS National Map: Orthoimagery: Data refreshed October, 2020