

**DEPARTMENT OF DEFENSE  
UNITED STATES ARMY**

**DRAFT FINDING OF NO PRACTICABLE ALTERNATIVE FOR  
REAL PROPERTY MASTER PLAN IMPLEMENTATION  
AT MILITARY OCEAN TERMINAL SUNNY POINT, NORTH CAROLINA**

**1.0 Introduction**

The Department of the Army (Army) proposes to implement various real property master planning actions at Military Ocean Terminal Sunny Point, North Carolina (MOTSU). These consist of maintenance, repair, upgrade, and development actions. The Army has determined that elements of the proposed action needed to meet safety, security, and mission needs must be located within portions of the floodplain and wetlands on MOTSU. Under Executive Order (EO) 11988, *Floodplain Management*, the Army must find that there is no practicable alternative to development within the 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.

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 500-year floodplain encompasses an area that has a 0.2 percent chance of being inundated in any year. This area includes the 100-year floodplain. The Army has determined that two of the proposed projects would necessarily occur in 5.3 acres of floodplains.

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." Wetlands are defined by the USACE as those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. The Army has concluded that three of the proposed projects would take place in 9.46 acres of wetlands and several others have the potential to affect wetlands, though their precise footprints are not known at this time.

This Draft Finding of No Practicable Alternative (FONPA) incorporates the analysis and conclusions of the Draft MOTSU Real Property Master Plan Implementation Environmental Impact Statement (EIS). It is being made available with the Draft EIS for public comment, in accordance with both EOs.

**2.0 Proposed Action**

The Army proposes to implement various real property master planning actions at MOTSU that are required improvements related to explosive safety, waterfront maintenance, security, and linear infrastructure. The projects and programs address compliance with federal, Department of

Defense, and Army standards vital to safety, security, and mission needs. These projects would be implemented in fiscal years (FY) 25 through 31.

- **Barricade Safety Projects:** annual barricade repair and maintenance and installation of lightning protection system in the North Rail Holding Yard.
- **Waterfront Maintenance:** implementing Phase 1 of shoreline protection program; maintenance and dredging of channels, berths, and turning basin and the MOTSU wharves; maintenance and repair of waterfront infrastructure; and maintenance and repair of security boat dock, ramp, wave attenuator.
- **Pleasure Island Explosive Safety Clear Zone (ESCZ) Security:** clearing and maintenance of vegetation at MOTSU's property line; fencing the area adjacent to MOTSU's property line; and establishing gates to control public access.
- **Linear Infrastructure Improvements:** constructing a secondary emergency egress road at the existing rail gate; repair and repave existing roads, hardstands, parking areas, and staging pads; upgrade and repair rail lines; and improve utilities within existing corridors.
- **Stormwater Mitigation:** flood mitigation in the Bridge Crane Area and Classification Yard; and installation-wide stormwater drainage improvements.
- **Cantonment Area Infill Development:** infill on parcels identified as developable including renovation, modernization, and new construction projects within the cantonment area to improve administrative functions, community support, maintenance, and storage and supply activities.

### 3.0 Assessment of the Direct Impact to the Floodplain

The barricade safety projects would take place within 5.05 acres of the floodplain, in an area of high risk as designated by the Federal Emergency Management Agency (FEMA). The ESCZ fence clearing would impact 0.25 acre of floodplain considered high risk flood zone by FEMA. Additionally, the phase 1 shoreline restoration work would occur in the floodplain, though project footprint is not available at this time to calculate the area affected. Repairs and maintenance of the security boat dock, ramp, and wave attenuators would be made to existing structures within the floodplain. No inhabited structures would be constructed within the floodplain as part of the proposed action.

The nature of each of these projects dictates their siting and therefore no practicable alternatives are available. The barricade safety projects would affect existing infrastructure that cannot be relocated without considerable cost as well as mission interruption, environmental, and safety impacts. The ESCZ boundary lies partially within the floodplain. Fencing addresses public safety issues. Phase 1 of the shoreline restoration work must occur at the shoreline and would be protective of the floodplain. Similarly, stormwater mitigation projects would be designed to be protective of existing infrastructure in the floodplain. When other project footprints are known, they would be subject to additional appropriate environmental review, including avoidance/minimization of impacts to the floodplain.

### 4.0 Assessment of the Direct Impact to Wetlands

Based on available project footprints, the barricade safety projects, construction of a secondary emergency egress road, and ESCZ fencing on Pleasure Island would impact up to 8.39, 0.61, and 0.46 acres of wetlands, respectively. Impacts to wetlands may also result from phase 1

shoreline restoration work, though the project footprint is not available to calculate the area affected. Additionally, other projects have the potential to affect wetlands though their specific locations and footprints are not available at this time. These include waterfront maintenance projects, linear infrastructure improvements, stormwater mitigation, and cantonment area infill development – none of which are new construction projects.

The nature of each of these projects dictates their siting and therefore no practicable alternatives are available. The barricade safety projects would affect existing infrastructure that cannot be relocated without considerable cost as well as mission interruption, environmental, and safety impacts. The secondary emergency egress road is sited at the rail gate where there is existing installation access. When project design is available, impacts to wetlands may be less than estimated here or wetlands could be avoided. Fencing the ESCZ boundary on Pleasure Island addresses public safety issues. Waterfront maintenance projects would occur on existing infrastructure. Shoreline restoration work must occur at the shoreline and would be protective of the floodplain. Similarly, stormwater mitigation projects would be designed to be protective of existing infrastructure, some of which may impact wetlands. When other project footprints are known, they would be subject to additional appropriate environmental review, including an assessment to impacts on wetlands.

## **5.0 Minimization of Impact from the Proposed Action**

Design, siting, and construction of the components of the proposed action would be implemented in accordance with permit requirements, MOTSU environmental management plans, and best management practices as appropriate to reduce the potential for adverse impacts to the floodplains and wetlands.

## **6.0 Public Availability**

A Notice of Availability of this Draft FONPA, along with the Draft EIS was published in the Federal Register as well as local newspapers, State Port Pilot and Star News. Interested parties can review the documents on the SDDC MOTSU Environmental Website:

<https://www.sddc.army.mil/SitePages/Environmental%20Programs.aspx>

Comments can be submitted during the comment 45-day period December 20, 2024 through February 4, 2025 to ATTN: Public Comments, James A. Rupkalvis, Installation Manager, 6280 Sunny Point Road, Southport, North Carolina 28461-7800, or by email to [james.a.rupkalvis.civ@army.mil](mailto:james.a.rupkalvis.civ@army.mil).

The public may also contact the Public Affairs Office, Surface Deployment and Distribution Command at (618) 220-6119, with questions.

Comments submitted within the public review period will be considered in developing the Final FONPA and EIS.

## **7.0 Finding**

Following an evaluation of the impacts associated with the proposed action and the impacts of alternatives for implementing the proposed action, I find there is no practicable alternative that is located outside of the floodplain or that would not involve impacts to wetlands. Pursuant to EO 11988 and EO 11990, the Army will take all practicable measures to minimize impacts associated with the proposed actions.

Date

Deputy Assistant Secretary of the Army  
(Installations, Housing, and Partnerships)