**FINDING OF NO PRACTICABLE ALTERNATIVE (FONPA)**

**JBSA COSA Swing Gate and Fence Construction through DEAAG**

13 September 2023

The City of San Antonio (COSA) is improving swing gates and fencing that lie within the 100-year floodplain as designated by the Federal Emergency Management Agency (FEMA). Executive Order (EO) 11988, Floodplain Management, seeks to avoid construction of facilities or structures within floodplains “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.” The proposed actions include replacing a swing gate and fencing at Joint Base San Antonio-Lackland (JBSA-LAK), installing fencing at JBSA-Sam Houston (JBSA-FSH), and replacing a swing gate at JBSA-Camp Bullis (JBSA-BUL). The contractor laydown area will avoid the floodplain. These improvements will provide the installations enhanced security and decrease flooding hazards.

Any alternatives considered must be in the flood plain, as the swing gates and security fencing are in the flood plain. The Air Force conducted an environmental analysis in accordance with 32 CFR Part 989, Air Force Environmental Impact Analysis Process. The analysis included an assessment of the impacts of the proposed action on flood risk to lives and property, and on the natural and beneficial values of floodplains, as described in the Water Resources Council’s implementation guidance to Executive Order 11988. The proposed action will result in no adverse effects to the natural and beneficial functions of the floodplain. There will be no rise in flood height. This project would not cause adverse effects to the natural and beneficial functions of the floodplain, nor will it cause the height or velocity of floodwaters to create flood hazards. Due to this, this action is not considered as incompatible development in a floodplain, and it is the only practicable alternative.

In accordance with the requirements of EO 11988, the Air Force provided Early Public Notice for the proposed action to occur in a 100-year floodplain. The Early Public Notice was posted on 7 August 2023 on the Joint Base San Antonio public website and was posted for 30 days. No public comments were received.