

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

### **ENVIRONMENTAL ASSESSMENT FOR THE RUNWAY ENCROACHMENT SOLUTION PROJECT AT SELFRIDGE AIR NATIONAL GUARD BASE**

**INTRODUCTION:** The Department of the Air Force (DAF) and the National Guard Bureau (NGB), in collaboration with the State of Michigan's Department of Military and Veterans Affairs (DMVA), proposes to implement the Runway Encroachment Solution Project at Selfridge Air National Guard Base (ANGB) to address residential encroachment and mitigate future risk of aircraft mishap and safety concerns within the southern clear zone (CZ) of the airfield.

The purpose of the proposed Runway Encroachment Solution Project at Selfridge ANGB is to ensure the long-term safety, operational effectiveness, and mission sustainment of the Base. The project directly addresses critical safety vulnerabilities caused by incompatible residential land use and ongoing encroachment in the southern CZ, which have demonstrably increased the potential for aircraft mishaps within that area. This encroachment presents a significant threat to aircraft operations, personnel safety, and the ability of Selfridge ANGB to execute its core missions, including homeland security, combat readiness, and disaster response. This project would mitigate the current risks and proactively prevent future encroachment, securing the long-term viability of Selfridge ANGB.

Executive Order (EO) 11988, *Floodplain Management*, requires federal agencies to avoid to the extent possible long- and short-term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct and indirect support of floodplain development wherever there is a practicable alternative. If it is found that there is no practicable alternative, the agency must minimize potential harm to the floodplain and circulate a notice explaining why the action is to be located in the floodplain prior to taking action. In accordance with EO 11988, a Finding of No Practicable Alternative (FONPA) must accompany the Finding of No Significant Impact (FONSI) stating why there are no practicable alternatives to development within or affecting floodplains.

EO 11990, *Protection of Wetlands*, directs agencies to avoid to the extent possible the long- and short-term adverse impacts associated with the destruction or modification of wetlands and to avoid direct or indirect support of new construction in wetlands wherever there is a practicable alternative. Federal agencies are to avoid new construction in wetlands, unless the agency finds there is no practicable alternative to construction in the wetland, and the proposed construction incorporates all possible measures to limit harm associated with development in the wetland. Agencies should use economic and environmental data, agency mission statements, and any other pertinent information when deciding whether or not to build in wetlands. In accordance with EO 11990, Department of Air the Force Instruction 32-7064, and Department of the Air Force Manual 32-7003, a FONPA must accompany the FONSI stating why there are no practicable alternatives to development within or affecting wetland areas.

The Proposed Action would result in impacts to both floodplains and wetlands. The following FONPA is therefore presented with the FONSI, pursuant to EO 11988 and EO 11990.

#### **NOTICE OF FLOODPLAIN INVOLVEMENT:**

As guided by EO 11988, the DAF hereby provides notice of work within floodplains.

Per the Federal Emergency Management (FEMA) Flood Insurance Rate Map (FIRM) for Macomb County, several of the proposed projects identified in the Environmental Assessment (EA) would occur within the 100-year floodplain associated with the Runway Encroachment Solution Project. Six of the 11 projects associated with the Runway Encroachment Solution Project would be partially located within the 100-year lake floodplain associated with Lake St. Clair, including the eastern end of Project 1, *Relocate Rosso Highway and Clear Zone Fence*; Project 2, *Relocate Irwin and Tucker Jones Drains and Modify Jefferson Culverts*; Project 3, *Relocate Base Perimeter Fence*; Project 4, *Relocate Perimeter Road and Airfield Fence*; Project 9, *Extend Taxiway Alpha to the Overrun*; and Project 10, *Taxiway Alpha Extension Arm/De-Arm Pad*.

The eastern half of Selfridge ANGB is located within a 100-year lake floodplain; therefore, the Air National Guard has determined that there is no practicable alternative for construction of these facilities outside the floodplain. The proposed infrastructure would be designed to avoid and minimize floodplain impacts to the extent possible. All construction in the floodplain would require compliance with Department of the Air Force Instruction 32-1023, *Designing and Constructing Military Construction Projects*, Unified Facilities Criteria 3-201-01, *Civil Engineering*, which includes compliance with federal standards, and Department of the Air Force Manual 32-7003. Additionally, no construction would impede the conveyance of flood waters, decrease floodplain capacity, or increase flood elevations, frequencies, or durations. Erosion and sediment control best management practices would be implemented to further prevent potential effects to floodplains from earthmoving construction activities. Pre-development hydrology would be maintained to the maximum extent feasible through compliance with Low Impact Development and Energy Independence and Security Act. The majority of new impervious surfaces would direct stormwater to installation stormwater systems, which would be able to accommodate the increased flow related to the increase in impervious surfaces. Floodplains would not be impacted due to relative size of the Lake St. Clair floodplain. Therefore, effects to floodplains under the Proposed Action would not be significant. These measures represent all practicable measures to minimize harm to floodplains.

#### **NOTICE OF WETLAND INVOLVEMENT:**

As guided by EO 11990, the DAF hereby provides notice of the potential for wetland impacts.

Projects 1–4, 6, 7, and 9 (Project 1, *Relocate Rosso Highway and Clear Zone Fence*; Project 2, *Relocate Irwin and Tucker Jones Drains and Modify Jefferson Culverts*; Project 3, *Relocate Base Perimeter Fence*; Project 4, *Relocate Perimeter Road and Airfield Fence*; Project 6, *Update Lighting/Markings and NAVAID Alignment*; Project 7, *Extend Taxiway Bravo*; and Project 9, *Extend Taxiway Alpha to the End of the Overrun*) would result in direct effects on up to an estimated 17.15 acres of these wetlands, all classified as freshwater emergent wetlands. All affected wetlands are located in the Lake St. Clair Watershed (Hydrologic Unit Code 8).

The wetlands affected by the Proposed Action would not represent a significant portion of the freshwater emergent wetlands at or just proximate to the Base (approximately 3 percent of emergent wetlands and 2 percent of all wetlands), and therefore this project does not represent a significant loss of wetlands in the Lake St. Clair Watershed. However, loss of wetlands in any amount results in declined ecosystem services, which is why wetland mitigation would be necessary to offset the loss of wetlands. Compensatory wetland mitigation is required by the Michigan Department of Environment, Great Lakes, and Energy (EGLE) under Part 303 of the

Natural Resources and Environmental Protection Act (NREPA) if a proposed project will cause unavoidable loss of wetland resources. As part of the permitting process, Selfridge ANGB is coordinating with EGLE to mitigate effects to wetlands through the use of an established wetland mitigation bank within the Lake St. Clair Watershed or an adjacent watershed; mitigation will include the purchase of 25.73 acres of wetland bank credits. These measures represent all practicable measures to minimize harm to wetlands.

Other alternatives were reviewed during the EA development process, but they were eliminated from further detailed analysis in the EA because they did not meet the stated purpose and need for the Proposed Action, were not practicable, or would have led to greater overall environmental impact. The only practicable alternatives are described in the “Description of the Proposed Action and Alternatives” section of the EA. For the reasons stated in the EA, the dismissed alternatives are not practicable alternatives for avoiding the potential wetland impacts.

**FINDING OF NO PRACTICABLE ALTERNATIVE:**

The Draft FONPA was available for public review from March 16 through April 15, 2026.

After careful consideration of the information presented in the EA, DAF has determined elements of this Proposed Action must be located within portions of the 100-year floodplain and wetlands on and proximate to Selfridge ANGB. This FONPA is supported by the analysis and conclusions of the EA for the Runway Encroachment Solution Project at Selfridge ANGB, Macomb County, Michigan.

The Proposed Action minimizes potential impacts to the greatest degree practicable while also continuing to meet the purpose and need. Accordingly, I find there is no practicable alternative to siting the Proposed Action entirely outside of the floodplains and/or wetlands; DAF will ensure that all practicable measures to minimize impacts are incorporated into the Proposed Action.

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Marc V. Hewett, P.E., GS-15, DAF  
Chief, Asset Management Division NGB/A4F

27 May 2026  
Date