

**DRAFT**  
**FINDING OF NO PRACTICABLE ALTERNATIVE (FONPA)**  
**FOCUS STUDY IMPLEMENTATION (FOUR CONSTRUCTION PROJECTS) AND EXPANDED**  
**HERBICIDE APPLICATION**  
**NIAGARA FALLS AIR RESERVE STATION**  
**NIAGARA COUNTY, NY**

**FINDING OF NO PRACTICABLE ALTERNATIVE:**

While Niagara Falls Air Reserve Station (NFARS) intends to avoid impacting the floodplain when determining the locations for placement of the airfield ramp lights, the locations are constrained by security and engineering requirements related to ensuring sufficient light coverage and maintaining a setback distance from airfield pavement. Consequently, locating one of the new light poles within the floodplain may be unavoidable. Additionally, two existing light poles proposed for removal are located within the floodplain. Therefore, in order to remove the existing light poles and ensure proper light coverage, there is no practicable alternative to working in floodplains. Pursuant to Executive Order 11988 and taking the above information into account, I find that there is no practicable alternative to this action and that the proposed project includes all practicable measures to minimize harm to the environment. This decision has been made after taking into account all submitted information and considering a full range of practical alternatives that meet project requirements and are within the legal authority of the U.S. Air Force Reserve Command (AFRC). The finding fulfills both the requirements of Executive Order 11988 and 32 CFR Part 989 for a Finding of No Practicable Alternative.

---

**MIKE KLUG, DAF**  
Acting Chief, Civil Engineer Division

---

Date

Attachment: Draft Environmental Assessment