

Environmental Assessment

City of Oklahoma City, OK

Draper Water Treatment Plant Emergency

Electrical Power Generation System

PDMC-PJ-06-OK-2014-002

Cleveland County, Oklahoma

March 2015



FEMA

Federal Emergency Management Agency
Department of Homeland Security
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LIST OF ACRONYMNS

ACHP	Advisory Council on Historic Preservation
APE	Area of Potential Effects
BMPs	Best Management Practices
CAA	Clean Air Act
CDBG-DR	Community Development Block Grant for Disaster Recovery
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CWA	Clean Water Act
dB	Decibels
dba	A-weighted decibels
Blvd.	Boulevard
DEQ	Department of Environmental Quality
DNL	Day/Night Levels
EA	Environmental Assessment
ECCI	Engineering, Compliance & Construction, Inc.
EIS	Environmental Impact Statement
EO	Executive Order
EPA	Environmental Protection Agency
FPPA	Farmland Protection Policy Act
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FONSI	Finding of No Significant Impact
ft	Foot
HSPS	High Service Pump Station
HUD	Housing and Urban Development
kW	Kilowatt
kV	Kilovolt
MBTA	Migratory Bird Treaty Act
mgd	Million gallons per day
MMBtu	One million British thermal units
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act of 1969
NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
NRHP	National Historic Preservation Act
NSPS	new source performance standards
OAC	Oklahoma Administrative Code
PDM	Pre-Disaster Mitigation Program
RCRA	Resource Conservation and Recovery Act
SHPO	State Historic Preservation Office
SWA	Solid Waste Act
SWPPP	Stormwater Pollution Prevention Plan
TPY	tons per year
TSCA	Toxic Substances Control Act
USACE	U.S. Army Corps of Engineers
USCB	U.S. Census Bureau

USDA
WOUS
USFWS
WTP

U.S. Department of Agriculture
Waters of the United States
U.S. Fish and Wildlife Service
Water Treatment Plant

1.0 INTRODUCTION

In order to strengthen the ability to provide potable drinking water to its citizens, the City of Oklahoma City (City) recently upgraded the Draper Water Treatment Plant (WTP). The improvements included a new 80 million gallons per day (mgd) high service pump station and suction flume improvements.

After the completion of these upgrades, it was recommended that the Draper WTP strengthen its electrical and mechanical systems. By providing redundancy in the electrical generation system, the City will be able to provide clean potable water in the event of a disaster and power loss. This Environmental Assessment (EA) addresses the development of a fixed, enclosed generator facility that will protect the electrical upgrades. The Generator Facility will house a bi-fuel (natural gas/diesel) power generation system consisting of three 2,500 Kilowatt (kW) generators along with paralleling gear and automatic switching equipment. Fixed diesel storage tanks will be installed along the south exterior of the Generator Facility. The generators will enable operation of the Draper WTP at 67 percent of its capacity (100 mgd). Additionally, the Generator Facility has been sized to incorporate a fourth fixed, bi-Fuel (natural gas/diesel) power generator to enable operation of the Draper WTP at 100 percent of its capacity (150 mgd).

This EA presents the potential environmental and socioeconomic effects that would result from the addition of a generator facility at the existing Draper WTP. Oklahoma City is located in central Oklahoma. The Draper WTP is located along South Douglas Boulevard (Blvd.) in southeastern Oklahoma City, Oklahoma. The project area is comprised of undeveloped land and the WTP. Lake Draper is located east of the project. See Exhibit 1 for the location of the proposed project.

This EA has been prepared in accordance with the National Environmental Policy Act (NEPA) of 1969, the President's Council on Environmental Quality regulations to implement NEPA (40 Code of Federal Regulations Parts 1500-1508), and the Federal Emergency Management Agency's (FEMA's) regulations implementing NEPA (44 CFR Part 10). FEMA is required to consider potential environmental impacts before funding or approving actions and projects. The purpose of this EA is to analyze the potential environmental impacts of the Draper WTP Generator Facility. FEMA will use the findings in this EA to determine whether to prepare an Environmental Impact Statement (EIS) or a Finding of No Significant Impact (FONSI).

2.0 PURPOSE AND NEED

The City, has requested FEMA Pre-Disaster Mitigation (PDM) Program funding to provide an emergency electrical generation system at the Draper WTP. The purpose of FEMA's PDM Program is to substantially reduce the risk of future damage, hardship, loss, or suffering in communities from natural disasters by providing the affected communities with cost-share funds to reduce future losses. PDM is authorized under Section 203 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act.

The purpose of the Proposed Action is to provide emergency electrical generation at the Draper WTP so that the City can provide safe, potable water during disasters or power loss. The City of Oklahoma City relies on the Draper WTP to provide potable water to its citizens. In the event of power loss, the WTP needs to continue its operations to provide healthy drinking water to its citizens. Potable water helps to prevent the spread of illness and to promote a timely recovery from disasters.

3.0 ALTERNATIVES

This section describes the alternatives that were considered in addressing the purpose and need stated in Section 2. Two alternatives are evaluated in this EA: the No Action Alternative and the Proposed Action Alternative, which is the construction of the proposed project.

3.1 NO ACTION ALTERNATIVE

Under the No Action Alternative, the existing Draper WTP would be unable to provide potable water in times of disaster and power loss. The No Action Alternative would not meet the need and purpose for the project, as it would not result in an emergency electrical generation system for the WTP.

3.2 PROPOSED ACTION

The proposed action is the installation of a fixed, enclosed generator facility (approximately 120 feet by 65 feet) that will house three 2,500 kW dual fuel generators within a protective building enclosure at the Draper WTP, located at 13701 S. Douglas Boulevard (Latitude: 35.32894; Longitude: -97.37131), Oklahoma City, Cleveland County, OK (see Figure 3-1). The generation system will also include paralleling gear and automatic switching equipment. Fixed diesel storage tanks will be installed along the south exterior of the proposed generator facility. The generators will enable operation of the Draper WTP at 67 percent of its capacity (100 mgd). Additionally, the generator facility has been sized to incorporate a fourth fixed, bi-fuel (natural gas/diesel) power generator to enable operation of the Draper WTP at 100 percent of its capacity (150 mgd).



FIGURE 3-1: Location of Proposed Generator Facility at Draper WTP

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Currently, the Proposed Action area is undeveloped land, overgrown with invasive bushes and trees. Photographs of the site are included on Exhibit 2. A site layout for the proposed action is included as Exhibit 3. The Proposed Action consists of maintaining Douglas Boulevard as a public road and offsetting the Generator Facility from the road. This would maintain the public right of way.

In addition to the new generator facility a circular driveway, a security fence, three double contained storage tanks (each 10,000 gallon capacity), a spill containment area, a low-pressure natural gas line, and an electrical duct bank will also be constructed. The generator facility's circular driveway will have an automatic gate and will allow access to the facility by tanker trucks and other vehicles from South Douglas Blvd.

The low-pressure natural gas line will be connected to the existing 12-inch, high-pressure natural gas main with a low-pressure tap connection. The locations of the new, low-pressure gas line and the existing gas main are shown on Exhibits 3 and 4, respectively. The natural gas will supply heat for the building and provide fuel to the bi-fuel generators.

A portion of an electrical duct bank will be constructed to interconnect the generator facility to Draper WTP's electrical distribution network that was constructed as part of a previous project. In addition, this project will include the necessary wiring and terminations between the generator facility and the Auxiliary High Service Pump Station. The generator facility's duct bank interconnection will be located north of the generator facility building. The location and portion of the duct banks included in the project is shown on Exhibit 3.

The generation facilities will be designed to operate as standby power to enable operations staff to engage the generation facilities prior to a severe weather event and if so desired, to operate the generation facilities to reduce peak day electrical demands during high tariff periods. As a result, the generators will be designed with pollution control equipment employing the Best Available Control Technology (BACT) to satisfy EPA Tier 4 FINAL emissions standards. Each generator will be operated at a maximum of 400 hours/year, plus any additional hours needed for non-emergency operation in anticipation of severe weather or in an emergency situation.

During the development process, approximately 2.3 acres of land will be disturbed, as shown in Exhibit 4. It is estimated that bedrock is 4 feet below surface. It is anticipated that the building will be founded based upon over-excavation to the rock layer with a structural backfill of aggregate base, to bring the building back to grade. As a result, it is anticipated that the average depth of excavation for the approximately 120 ft long x 65 ft building will be 4 feet, totaling approximately 31,200 cubic feet. Where necessary for the remainder of the site, the topsoil will be stripped and cutting and filling will be performed with the soil to develop the grade from the road to the generation building. Following this, the topsoil will be restored and the site will be landscaped to conform to the city ordinance.

A staging area for construction activities will be located adjacent and south of the site, as illustrated in Exhibit 4. The staging area is included in the calculation of 2.3 acres of disturbed land.

Building the proposed project would accommodate and protect the needed generators to provide emergency electrical generation for the Draper WTP.

3.3 ALTERNATIVES CONSIDERED AND DISMISSED

One additional alternative was considered (Alternative No. 1). Alternative No. 1 consisted of relocating Douglas Boulevard west of the Draper WTP, moving the Generator Facility closer to the existing Douglas Boulevard, and maintaining Douglas Boulevard as a plant entrance/exit road. Exhibits 5 and 6 include the site plan for Alternative No. 1 and the realignment of Douglas Boulevard, respectively.

The City of Oklahoma City compared the proposed action and Alternative No. 1 based on the following constraints:

- The Generator Facility should be located within the existing Draper Lake property boundary, so it can easily be checked daily by plant operation and maintenance staff.
- The Generator Facility should be located as close as possible to the new auxiliary pump station to reduce costs. The electrical duct bank that is needed to connect the generators to the Auxiliary High Service Pump Station is approximately \$3,000 per linear foot. As a result, it is preferred to have the Generator Facility located as close as possible to the Auxiliary High Service Pump Station.
- The Generator Facility should not obstruct the construction of future planned facilities, shown in Exhibit 7.
- The Generator Facility should be located close to the existing high-pressure gas line to enable feed of natural gas to the fixed, bi-fuel, 2,500 kW generators.

Exhibit 8 presents a cost comparison of the Proposed Action and Alternative No. 1. The results indicate that the Proposed Action is less costly to implement. Additionally, the Proposed Action results in a reduction in the potential land disturbance during construction of the project. Alternative No. 1 would require relocation of 6,000 linear feet of road, causing a land disturbance of approximately 4.5 acres. Alternatively, the Proposed Action only results in a land disturbance of approximately 2.3 acres.

Alternative No. 1 was dismissed due to the plan's larger costs and greater disturbance to the land and therefore is not analyzed any further in this EA.

4.0 AFFECTED ENVIRONMENT AND POTENTIAL IMPACTS

This section describes the potential impacts of the No Action Alternative and the proposed action. Where potential impacts exist, mitigation measures or Best Management Practices (BPMs) are used to offset the impacts. A summary table is provided in Section 4.6.

4.1 PHYSICAL RESOURCES

4.1.1 Geology, Soils, and Seismicity

The Geologic Map of the Franklin 7.5-minute Quadrangle (Exhibit 9) indicates the proposed action location is underlain by the Garber formation of the Permian time period (Hemish and Suneson 1998). The Garber formation is primarily comprised of fine-grained to medium- fine-grained sandstone.

The Franklin Quadrangle map indicates that the proposed action location lies at an approximate elevation of 1,150 ft above mean sea level. The land at and around Draper WTP appears to slope east towards Stanley Draper Lake.

According to the U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) online Web Soil Survey (Exhibit 10), the proposed action location has Harrah fine sandy loam, with an approximate slope of 5 to 8 percent. Areas adjacent to the proposed action location consist mostly of Stephenville-Darsil-Newalla complex, with an approximate slope of 3 to 8 percent. The Harrah and Stephenville soils are typically found as hill slopes. The USGS Earthquake Hazards Programs develops Seismic Hazard Maps for each state. The map for Oklahoma (Exhibit 11) indicates that the proposed project area lies within an area with a relatively low probability for earthquakes.

No Action Alternative

Under the No Action Alternative, no construction would occur and the physical resources of the proposed action's location would be unaltered.

Proposed Action Alternative

Under the Proposed Action Alternative, construction activities would include only minimal site grading and excavation (depth of approximately 4 feet below grade) and would not be deep enough to impact underlying geologic resources. Oklahoma has experienced more frequent earthquakes in recent years, possibly linked to oil and gas wells. The proposed action does not include plans for wells or other facilities that would result in seismic impacts. Additionally, the generator facility will be an enclosed, hardened structure. The design for foundation of the building and all other structures will satisfy the seismic acceleration values and seismic requirements established by the currently adopted International Building Code. Further, the historic instances and future probability of earthquakes in the area are low.

The Harrah and Stephenville soils are classified as prime farmland soils; however, per a NRCS response dated July 6, 2014 (Exhibit 12), the project area is exempt from the Farmland Protection Policy Act (FPPA) because it is located on lands already committed to urban development.

The City may be required to prepare a Storm Water Pollution Prevention Plan (SWPPP) and obtain a National Pollutant Discharge Elimination System (NPDES) permit prior to construction. Implementation of appropriate Best Management Practices (BMPs) such as use of silt fences and revegetation of disturbed soils, as described in the SWPPP and required for the NPDES permit, would help minimize erosion and site runoff. Excavated soil, waste materials and debris will be managed and disposed of in accordance with applicable local, state, and federal regulations in an approved manner and location.

4.1.2 Hazardous Materials

Hazardous waste is defined by the Resource Conservation and Recovery Act (RCRA) as "a solid waste, or combination of solid wastes, which because of its quantity, concentration, or physical, chemical, or infectious characteristics may: (1) cause, or significantly contribute to an increase in mortality or an increase in serious irreversible or incapacitating reversible illness; or (2) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported or disposed of, or otherwise managed."

Federal and state regulations govern the assessment, handling, and disposal of hazardous materials. Some of these federal regulations include RCRA; the RCRA Hazardous and Solid Waste Amendments; Comprehensive Environmental Response, Compensation and Liability Act (CERCLA); the Solid Waste Act (SWA); and the Toxic Substances Control Act (TSCA).

Visual observations and environmental database reviews did not reveal obvious existing or potential hazardous materials, substances, or conditions at the Proposed Action's location.

No Action Alternative

Under the no action alternative, hazardous materials would not be created or disturbed.

Proposed Action Alternative

The construction of the Generator Facility is not anticipated to create a potential hazard to human health or the physical environment. Additionally, encountering hazardous materials during the construction process is not anticipated. In the event that hazardous constituents are unexpectedly encountered, the construction will be halted for proper assessment, remediation, and management of the contamination.

As precautionary measures for fuel spills, the diesel fuel tanks and piping will be double-contained and a spill containment area will be constructed. The piping will have spill containment basins and alarms designed to shut down fueling upon leak detection. The spill containment area will be installed along the circular drive and adjacent to the three diesel

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tanks. The spill containment area will be used to capture diesel fuel in the event of a spill from diesel fuel delivery or from the diesel tanks themselves. In the event of a spill, the containment sump will be able to contain the volume of one diesel tank truck plus freeboard.

4.1.3 Air Quality

The Clean Air Act (CAA) of 1997 requires that states adopt ambient air quality standards. National Ambient Air Quality Standards (NAAQS) have been established in order to protect the public from potentially harmful amounts of pollutants. Standards have been established for six “criteria” pollutants which include sulfur dioxide, carbon monoxide, ozone, nitrogen oxides, lead, and inhalable particulate matter. Under the CAA, the Environmental Protection Agency (EPA) establishes primary and secondary air quality standards. Primary air quality standards protect the public health, including the health of “sensitive populations” including people with asthma, children, and older adults. Secondary air quality standards protect public welfare by promoting ecosystem health, preventing decreased visibility, and preventing damage to crops and buildings. According to the EPA, no counties in Oklahoma are classified as nonattainment areas for criteria pollutants (EPA 2010).

No Action Alternative

Under the No Action Alternative, there would be no impacts to air quality.

Proposed Action Alternative

Under the Proposed Action Alternative, no long-term impacts to air quality would occur. Each generator will only be operated at a maximum of 400 hours/year, plus any additional hours needed for non-emergency operation in anticipation of severe weather or in an emergency situation.

Short-term, minor increases in air pollutant emissions may occur from construction activities. The primary construction-related emissions are particulate matter (fugitive dust) from site preparation and pollutants from fuel-powered construction equipment and vehicles. These emissions are temporary in nature (only occurring during actual construction); it is not possible to reasonably estimate impacts from these emissions. However, the potential impacts of particulate matter emissions will be minimized by using fugitive dust control measures such as covering or treating disturbed areas with dust suppression techniques, sprinkling, covering loaded trucks, and other dust abatement controls, as appropriate.

Fuel- burning equipment will only be operated as needed, in order to reduce fuel-burning related emissions.

Considering the temporary and transient nature of construction-related emissions, as well as the mitigation actions to be utilized, it is not anticipated that emissions from construction of this project will have a long-term impact on air quality in the area.

The primary hazardous air pollutant (HAP) emission from the bi-fuel gas-fired engines is formaldehyde (HCHO). Formaldehyde emissions from the engines are estimated based on

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formaldehyde emission factor derived from AP-42 (7/00), Section 3.2, Table 3.2-3, for uncontrolled 4-stroke rich burn natural gas-fired stationary engines, 7.89e-05 lb/MMBtu (one million British thermal units). Based upon an operating time of 500 hours/year for 3 generators, average Brake Specific Fuel Consumption of 7,000 Btu/hp-hr, a natural gas component of 95 percent, the maximum formaldehyde emissions from the facility would be approximately 9.04 lb annually.

The diesel-burning portion of the total hazardous air pollutant (HAP) emission factors are taken from AP-42 Table 3.4-3 (10/96) as 0.001362 lb/MMBTU. Based upon an operating time of 500 hours/year for 3 generators, average diesel fuel consumption of 8,000 BTU/hp-hr, a diesel fuel component of 50 percent, the maximum HAP emissions from the facility would be approximately 0.0342 tons per year (TPY), which is below 10 TPY major source threshold.

As an Owner/Operator of new source performance standards (NSPS) Subpart III generators, with a displacement of greater than or equal to 30 liters per cylinder (60.4204(c)) and with the generators installed after January 1, 2016, the operation of the pollution control system will

- Reduce Particulate Matter emissions by 60 percent or more, or limit the emission of PM in the exhaust to 0.15 g/KW-hr (0.11 g/HP-hr).
- Limit the emissions of NO_x to:
 - 3.4 g/KW-hr (2.5 g/HP-hr) when max. engine speed is $x < 130$ revolutions/min
 - $9.0 \times n^{-0.20}$ g/KW-hr ($6.7 \times n^{-0.20}$ g/HP-hr) when max. engine speed is $130 \leq x < 2,000$ rpm, where n is the max. engine speed; and
 - 2.0 g/KW-hr (1.5 g/HP-hr) when max. engine speed is $x \geq 2,000$ rpm

Table 4-1 summarizes the anticipated operating permit levels:

TABLE 4-1: Engine Emissions Factors

Emission Source	Qty	NO _x (g/hp-hr)	CO (g/hp-hr)	VOC (g/hp-hr)	PM ₁₀ (g/hp-hr)
GEN1, GEN2, GEN3	3	$9.0 \times n^{-0.20}$ g/KW-hr ($6.7 \times n^{-0.20}$ g/HP-hr) ^{1,2}	2.60 ¹	0.30 ¹	0.11 ¹

¹Based on NSPS Subpart IIII

²Maximum engine speed is 1,800 rpm

In addition, since controlled criteria pollutant emissions are less than 100 TPY for each pollutant, and emissions of HAPs will not exceed 10 TPY for any one of HAPs or 25 TPY for any aggregate of HAPs, the facility is defined as a synthetic minor source.

The following summarizes the major elements of the State of Oklahoma requirements and their applicability to the Draper Power Generation System Permitting:

- OAC (Oklahoma Administrative Code) 252:100-2 (Incorporation by Reference)
 - This subchapter incorporates by reference applicable provisions of Title 40 of the Code of Federal Regulations. These requirements are addressed in the “Federal Regulations” section.
- OAC 252:100-3 (Air Quality Standards and Increments)

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- Primary Standards are in Appendix E and Secondary Standards are in Appendix F of the Air Pollution Control Rules. At this time, all of Oklahoma is in attainment of these standards.
- OAC 252:100-5 (Registration, Emissions Inventory, and Annual Operating Fees)
 - Subchapter 5 requires sources of air contaminants to register with Air Quality, file emission inventories annually, and pay annual operating fees based upon total annual emissions of regulated pollutants. Required annual information (Turn-Around Document) shall be provided to Air Quality.
- OAC 252:100-7 (Permits for Minor Facilities)
 - Subchapter 7 sets forth the permit application fees and the basic substantive requirements of permits for minor facilities. Since controlled criteria pollutant emissions are less than 100 TPY for each pollutant, and emissions of HAPs will not exceed 10 TPY for any one of HAPs or 25 TPY for any aggregate of HAPs, the facility is defined as a synthetic minor source.
- OAC 252:100-9 (Excess Emissions Reporting Requirements)
 - Except as provided in OAC 252:100-9-7(a)(1), the owner or operator of a source of excess emissions shall notify the Director as soon as possible but no later than 4:30 p.m. the following working day of the first occurrence of excess emissions in each excess emission event. No later than thirty (30) calendar days after the start of any excess emission event, the owner or operator of an air contaminant source from which excess emissions have occurred shall submit a report for each excess emission event describing the extent of the event and the actions taken by the owner or operator of the facility in response to this event. Request for affirmative defense, as described in OAC 252:100-9-8, shall be included in the excess emission event report. Additional reporting may be required in the case of ongoing emission events and in the case of excess emissions reporting required by 40 CFR Parts 60, 61, or 63.
- OAC 252:100-25 (Visible Emissions and Particulates)
 - No discharge of greater than 20 percent opacity is allowed except for short-term occurrences that consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60 percent opacity. When burning natural gas and low sulfur diesel there is very little possibility of exceeding these standards.
- OAC 252:100-29 (Fugitive Dust)
 - No person shall cause or permit the discharge of any visible fugitive dust emissions beyond the property line on which the emissions originated in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or to interfere with the maintenance of air quality standards. Under normal operating conditions, this facility has negligible potential to violate this requirement; therefore it is not necessary to require specific precautions to be taken.

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- OAC 252:100-31 (Sulfur Compounds)
 - Part 5 limits sulfur dioxide emissions from new fuel-burning equipment (constructed after July 1, 1972). For gaseous fuels the limit is 0.2 lb/MMBTU heat input averaged over 3 hours. For fuel gas having a gross calorific value of 1,000 BTU/SCF, this limit corresponds to fuel sulfur content of 1,203-ppmv. For liquid fuels the limit is 0.8 lb/MMBTU heat input averaged over 3 hours. Air Emissions, are calculated as 0.05 lb/MMBTU, which indicate that all units are in compliance. The permit requires the use of gaseous fuel with sulfur content less than 343-ppmv and diesel fuel with a sulfur content less than 0.05 percent by weight to ensure compliance with Subchapter 31.
- OAC 252:100-43 (Testing, Monitoring, and Recordkeeping)
 - This subchapter provides general requirements for testing, monitoring and recordkeeping and applies to any testing, monitoring or recordkeeping activity conducted at any stationary source. To determine compliance with emissions limitations or standards, the Air Quality Director may require the owner or operator of any source in the state of Oklahoma to install, maintain and operate monitoring equipment or to conduct tests, including stack tests, of the air contaminant source. All required testing must be conducted by methods approved by the Air Quality Director and under the direction of qualified personnel. A notice-of-intent to test and a testing protocol shall be submitted to Air Quality at least 30 days prior to any EPA Reference Method stack tests. Emissions and other data required to demonstrate compliance with any federal or state emission limit or standard, or any requirement set forth in a valid permit shall be recorded, maintained, and submitted as required by this subchapter, an applicable rule, or permit requirement.

Data from any required testing or monitoring not conducted in accordance with the provisions of this subchapter shall be considered invalid. Nothing shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

4.2 WATER RESOURCES

4.2.1 Waters of the U.S. Including Wetlands

The Clean Water Act (CWA), as amended in 1977, established the basic framework for regulating discharges of pollutants into the Waters of the United States (WOUS). The U.S. Army Corps of Engineers (USACE) regulates the discharge of dredged or fill material into WOUS, including wetlands, pursuant to Section 404 of the CWA. Executive Order (EO) 11990 (Protection of Wetlands) requires Federal agencies to avoid, to the extent possible, adverse impacts to wetlands. Wetlands are delineated based on an area meeting three criteria: hydric soils, hydrophytic vegetation, and hydrologic indicators. The U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI) (Exhibit 13) and the USDA/NRCS online Web

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Soil Survey maps of the project area were reviewed to determine the potential for wetlands and other WOUS to exist within the project area.

The NWI map shows that the project area contains no wetlands. To the east of the project area, just on the opposite side of Douglas Boulevard, two small wetlands exist. One is a freshwater pond (PUBHh) and the other is a freshwater forested/shrub wetland (PFO1Ah). These features

are connected and have been created or modified by a man-made barrier or dam. Lake Stanley Draper is located east of the project area, approximately 0.75 miles. West Elm Creek is located southwest of the project area, approximately 0.75 miles. The NRCS online Web Soil Survey depict West Elm Creek as a blue-line stream; therefore, the tributary is considered a WOUS under the jurisdiction of the USACE.

No Action Alternative

Under the No Action Alternative, there will be no impacts to wetlands or other WOUS.

Proposed Action Alternative

Based on review of the U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory map and based on a July 9, 2014, response received from the USACE stating that the proposed project would not require a Department of the Army permit (Exhibit 14), the proposed project will have no “adverse effect” on wetlands or other WOUS. The applicant must ensure that best management practices are implemented to prevent erosion and sedimentation to surrounding, nearby or adjacent surface waters.

This includes equipment storage and staging of construction to prevent erosion and sedimentation to ensure that wetlands are not adversely impacted per the CWA and EO 11990. The City may be required to prepare a Storm Water Pollution Prevention Plan (SWPPP) and obtain a National Pollutant Discharge Elimination System (NPDES) permit prior to construction. Implementation of appropriate Best Management Practices (BMPs) such as use of silt fences and revegetation of disturbed soils, as described in the SWPPP and required for the NPDES permit, would help minimize erosion and site runoff.

4.2.2 Floodplains

Executive Order (EO) 11988 (Floodplain Management) requires federal agencies to avoid direct or indirect support of development within the 100-year floodplain whenever there is a practicable alternative. FEMA uses Flood Insurance Rate Maps (FIRMs) to identify the regulatory 100-year floodplain for the National Flood Insurance Program (NFIP). Consistent with EO 11988, Panel 205 of 475 of the City of Oklahoma City FIRM 40027C0205AH, dated September 26, 2008 was examined during the preparation of this EA. The project area is located within Zone X, outside of the 100 and 500 year floodplain. (Exhibit 15)

No Action Alternative

Under the No Action Alternative, floodplains will not be impacted.

Proposed Action Alternative

Under the Proposed Action Alternative, floodplains will not be impacted. The proposed project site is located within Zone X and is not located within a FEMA designated 100-year or 500-year floodplain or floodway.

4.3 BIOLOGICAL RESOURCES

4.3.1 Threatened and Endangered Species and Critical Habitat

The Endangered Species Act affords protection for federally listed threatened and endangered species and, where designated, critical habitat for these species. The USFWS maintains a list of federally threatened and endangered species and their geographic occurrences. Based on review of the official USFWS Species List (Exhibit 16), species known to occur in Cleveland County are shown in Table 4-2.

TABLE 4-2: Federally-Listed Species and Designated Critical Habitat

Species	Listing Status	Habitat Requirements	Determination of Effect
Interior least tern (<i>Sterna antillarum</i>)	Endangered	Islands or sandbars along large rivers, mostly clear of vegetation for nesting and loafing and with Islands or sandbars along large rivers, mostly clear of vegetation for nesting and loafing and with shallow water nearby for fishing.	No effect.
Whooping crane (<i>Grus americana</i>)	Endangered	Foraging habitat includes primarily croplands. Roosting habitat includes shallowly-submerged sandbars in large river channels and large palustrine wetlands close to feeding areas.	No effect.
Piping plover (<i>Charadrius melodus</i>)	Threatened	Migratory stopover habitat includes sparsely vegetated sandy or gravelly shorelines and islands associated with the major river systems, salt flats and mudflats of reservoirs.	No effect.
Red Knot (<i>Calidris canutus rufa</i>)	Proposed Threatened	Migratory stopover habitat includes shoreline.	No effect.
Sprague's Pippet (<i>Anthus spragueii</i>)	Candidate	Ground nester that breeds and winters on open grasslands	No effect.

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Species	Listing Status	Habitat Requirements	Determination of Effect
Arkansas River Shiner	Threatened	Wide sandy-bottomed streams of the Arkansas River drainage in Arkansas, Kansas, New Mexico, Oklahoma, and Texas.	No effect.

Critical habitat has been designated for the Whooping crane, Piping plover, and Arkansas River Shiner. There is a critical habitat unit for the Arkansas River Shiner located about 10 miles southwest of the project area in the Canadian River. The proposed project site does not include any critical habitat.

The Migratory Bird Treaty Act (MBTA) of 1918 protects birds that migrate across international borders. The MBTA makes it illegal to “pursue, hunt, take, capture, kill, ... possess, ..., at any time, or in any manner, any migratory bird,... or any part, nest, or egg of any such bird.”

The Draper WTP lies in the Cross Timbers area predominately comprised of hard woods and conifers. The site’s vegetation consists of native grasses, invasive bushes, and conifer trees, most of which are the Eastern Red-cedar which is rampant in the area. While native to Oklahoma, the Eastern Red-cedar is not indigenous to the Draper WTP area. The Draper WTP area is overgrown with non-native vegetation because of a lack of wildfires over the last 50 years to control them.

No Action Alternative

Under the No Action Alternative, there will be no impacts to threatened species, endangered species, or critical habitats.

Proposed Action Alternative

Based on review of the U.S. Fish and Wildlife Service (USFWS) Species List, and on the habitat present at the project site, FEMA has determined that the proposed project will have no effect on federally listed species. The proposed action will not affect critical habitat because none is present in the project area.

The following mitigation measures would be required to avoid and reduce potential impacts to migratory birds. The applicant will limit vegetation clearing work during the peak migratory bird nesting period of March through August as much as possible to avoid destruction of individuals, nests, or eggs. If vegetation clearing must occur during the nesting season, the applicant will deploy a qualified biological monitor with experience conducting breeding bird surveys to survey the project area for nests prior to conducting work. The biologist will determine the appropriate timing of surveys in advance of work activities. If an occupied migratory bird nest is found, work within a buffer zone around the nest will be postponed until the nest is vacated and juveniles have fledged. The biological monitor will determine an appropriate buffering radius based on species present, real-time site conditions, and proposed impacts to vegetation. If avoidance of the nests is not possible, a professional with ornithological experience will monitor the nests during construction

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and/or coordinate the relocation of the bird and nest. Relocation activities will be coordinated with the USFWS. For work near an occupied nest, the biological monitor would prepare a report documenting the migratory species present and the rationale for the buffer radius determination or the relocation effort, and submit that report and any communication with USFWS to FEMA for inclusion in project files. FEMA does not anticipate a taking of migratory birds based on the habitat that is available at the project site.

4.4 CULTURAL RESOURCES

The National Historic Preservation Act (NHPA) of 1966, (PL 89-665; 16 USC 470 et seq.) as amended, outlines Federal policy to protect historic properties and promote historic preservation in cooperation with States, Tribal Governments, local governments, and other consulting parties.

The NHPA established the National Register of Historic Places (NRHP) and designated the State Historic Preservation Office (SHPO) as the entity responsible for administering State-level programs. The NHPA also created the Advisory Council on Historic Preservation, the Federal agency responsible for overseeing Section 106 of the NHPA process and its implementing regulations (36 CFR 800) and providing commentary on Federal activities, programs, and policies that affect historic properties.

Section 106 of the NHPA outlines the procedures for Federal agencies to follow to take into account the effect of their actions on historic properties. The Section 106 process applies to a Federal undertaking that has the potential to affect historic properties, defined in the NHPA as those properties (archaeological sites, standing structures, or other historic resources) that are listed in or eligible for listing in the NRHP. Although buildings and archaeological sites are most readily recognizable as historic properties, a diverse range of resources are listed in the NRHP, including roads, landscapes, and vehicles. Under Section 106, Federal agencies are responsible for identifying historic properties within the Area of Potential Effects (APE) for an undertaking, assessing the effects of the undertaking on those historic properties, if present, and considering ways to avoid, minimize, and mitigate any adverse effects of its undertaking on historic properties; it is the primary regulatory framework that is used in the NEPA process to determine impacts on cultural resources. The APE is the geographic area within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if such properties exist.

There are no historic structures or structures 45 years old or older within the project APE. The Community Assistance Program staff of the Oklahoma Archeological Survey (OAS) crosschecked state site files containing approximately 23,000 archeological sites that are currently recorded for the state of Oklahoma and determined that no sites were listed within the project area.

No Action Alternative

Under the No Action Alternative, no construction would occur and no historic properties/resources would be affected.

Proposed Action Alternative

The APE for the proposed action is approximately 2.3 acres, as shown in Exhibit 2.

FEMA has made a determination of no historic properties affected.

Formal consultation with the State Historic Preservation Office (SHPO) was submitted via written request dated October 1, 2014 (Exhibit 17). In a letter dated October 14, 2014, SHPO concurred that no known historic properties would be affected by the proposed undertaking (Exhibit 18).

The Community Assistance Program staff of the OAS crosschecked state site files containing approximately 23,000 archeological sites that are currently recorded for the state of Oklahoma. In a letter dated July 23, 2014 (Exhibit 19), the OAS determined that no sites were listed as occurring within the project area. In addition, OAS determined that based on the topographic and hydrological setting, no archaeological materials are likely to be encountered therefore an archaeological field inspection was not considered necessary for the proposed action.

In addition to the OAS and SHPO consultations, in October 2014 FEMA consulted with three federally recognized tribes that have potential interest in the project area: Chickasaw Nation, Kiowa Tribe of Oklahoma, and Osage Nation (Exhibits 20-22). In a letter dated November 19, 2014, the Osage Nation determined that the proposed project will not adversely affect properties of cultural or sacred significance to the tribe (Exhibit 23).

At the time of this draft EA, FEMA had not received responses from the other two tribes.

In the event that archeological deposits, including any Native American pottery, stone tools, bones, or human remains, are uncovered, the project shall be halted and the City shall stop all work immediately in the vicinity of the discovery and take all reasonable measures to avoid or minimize harm to the finds. The Oklahoma Archeological Survey and the SHPO will be notified immediately for consultation.

4.5 SOCIOECONOMIC RESOURCES

4.5.1 Socioeconomics

The City of Oklahoma City is located in central Oklahoma within Cleveland County and Oklahoma County. The proposed action location lies within Cleveland County. According to the U.S. Census Bureau (USCB) American Fact Finder, the total population of Oklahoma City in 2013 was estimated to be 610,613 persons (USCB 2013).

4.5.2 Environmental Justice

EO 12898 (Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations) mandates that Federal agencies identify and address, as

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appropriate, disproportionately high and adverse human health or environmental effects of their programs, policies, and activities on minority and low-income populations.

Socioeconomic and demographic data for the project area (Table 4-3) were reviewed to determine if a disproportionate number of minority or low-income persons have the potential to be adversely affected by the proposed project.

TABLE 4-3: USCB Data for Project Area

	City of Oklahoma City	Cleveland County	State of Oklahoma
Total Population (2013)	610,613	269,340	3,850,568
Annual median household income (2008-2012)	\$45,704	\$54,883	\$44,891
% Households below poverty level (2008-2012)	17.6	12.9%	16.6%
% Minority population	45.1	27.3%	34.3%
% Hispanic (may be of any race)	17.2	7.8	9.6
% of population over 65	11.3	11.5	14.3

Source: USCB 2012, 2013

Minorities represented 45.1 percent, 27.3 percent, and 34.3 percent, respectively, of the City of Oklahoma City, Cleveland County, and the State of Oklahoma populations. Table 4-4 shows the specific racial composition of the City of Oklahoma City, Cleveland County, and the State of Oklahoma. Cleveland County has a higher median household income and a lower percentage of low-income populations than the City of Oklahoma City and the State of Oklahoma. The dominant ethnicity for Cleveland County is white (73.9 percent of the population).

No Action Alternative

Under the No Action Alternative, no action would be taken to provide back-up power for the Draper WTP. There would be no disproportionate impacts on minority or low-income populations; all populations would continue to be adversely affected by not having access to potable water due times of power outages.

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TABLE 4-4: USCB Racial Composition of Oklahoma City, Cleveland County, and State of Oklahoma

Ethnicity	City of Oklahoma City	Cleveland County	State of Oklahoma
% White	56.7	73.9	67.5
% Hispanic or Latino	17.2	7.8	9.6
% Black or African American	15.1	4.8	7.7
% American Indian or Native Alaskan	3.5	5.0	9.0
% Native Hawaiian or Other Pacific Islander	0.1	0.1	0.2
% Asian	4.0	4.2	2.0

Source: USCB 2014

Proposed Action Alternative

Under the Proposed Action Alternative, no disproportionate impacts on minority or low-income populations would occur. All residents would benefit from access to potable water in times of power outages.

4.5.3 Noise

Congress enacted the Noise Control Act of 1972 to promote an environment that protects Americans from noise that can jeopardize their health and welfare. Noise is generally defined as unwanted sound. Sound is most commonly measured in decibels (dB) on the A-weighted scale, which is the scale most similar to the range of sounds that humans can hear. The Day- Night Average Sound Level (DNL), which is measured in dBs, is an average measure of sound. The DNL descriptor is accepted by federal agencies as a standard for estimating sound impacts and establishing guidelines for compatible land uses. Outdoor sound levels in excess of 55 dB are normally considered unacceptable for noise-sensitive lands such as residences, schools, or hospitals. The proposed action location is not within a noise-sensitive area. Sites with a DNL of 65 dB or higher are considered to be high noise areas.

The location of the proposed action is along a busy road considered to be a major noise source. To comply with 24 CFR 51, a noise assessment was completed using the US Department of Housing and Urban Development's (HUD's) DNL calculator. 59.903 dBs were calculated. This value is under the 65 dB threshold that requires mitigation (Exhibit 24).

No Action Alternative

Under the No Action Alternative, no construction would occur and there would be no impacts to noise levels.

Proposed Action Alternative

Noise associated with the construction of the project is difficult to predict. Heavy machinery, the major source of noise in construction, is constantly moving in unpredictable patterns. However, construction will occur from 7:30 am to 4:30 pm, Mondays through Fridays, during daylight hours when occasional loud noises are more tolerable. However, it is possible for construction work to occur anytime and on any day for brief periods of time. Surrounding

properties are not expected to be exposed to construction noise for a long duration; therefore, any extended disruption of normal activities is not expected.

After construction is completed, the proposed action is not expected to add substantial noise beyond what currently exists. The generator facility will be designed inside a building with concrete masonry or precast concrete walls. The impact on the noise on the building exterior will be designed to be < 80 A-weighted decibels (dbA). The interior of the building, particularly in the generator room, will require hearing protection when the generators are in operation.

4.5.4 Traffic

The proposed action is located to the west of Douglas Boulevard, currently designated as a rural arterial. Rural arterials are classified as streets and highways (usually state highways) that complement the urban arterial system and serve both moderate to long trip lengths in rural areas. The rural arterial system provides a minimum of direct land access.

No Action Alternative

Under the No Action Alternative, there would be no impacts to traffic.

Proposed Action Alternative

Under the Proposed Action Alternative, an entrance and exit for the Generator Facility would be connected to the existing Douglas Boulevard. Major changes to the exiting traffic pattern are not anticipated.

Impacts to transportation routes during construction of the proposed action are anticipated to be temporary. No changes to area-wide traffic patterns are anticipated. Motorists currently using Douglas Blvd would continue to use this roadway.

The proposed project would not eliminate or change any existing access to adjacent properties.

4.5.5 Public Service and Utilities

Currently, the proposed action location is undeveloped. However, electrical service is available. The City of Oklahoma City provides water and sewer service in the area and to adjacent

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commercial properties, along with solid waste collection. Health services are available at OU Medical Center in Oklahoma City, Oklahoma, Norman Regional Hospital in Norman, OK, and Midwest City Regional Medical Center, Midwest City, OK.

No Action Alternative

Under the No Action Alternative, local public services and utilities would not be impacted. Under the No Action Alternative, the Draper WTP would not have an emergency power source, resulting in the WTP being unable to operate in times of local utility outages. This would result in the WTP being unable to provide the public service of potable water to its customers.

Proposed Action Alternative

Implementation of the proposed action would require access to city services and utilities in the form of water, natural gas, electricity, sewer service, and solid waste disposal.

Existing electric and water utilities are located along South Douglas Blvd. A 6-inch potable water line will supply water for generator cooling, an eyewash, fire protection equipment, and for dilution of emission control chemical feed systems.

A new, 4-inch, low-pressure natural gas line will be connected to the existing 12-inch, high-pressure natural gas main with a low-pressure tap connection. The locations of the new, low-pressure gas line and the existing gas main are shown on Exhibits 3 and 4, respectively. The natural gas will supply heat for the building and provide fuel to the bi-fuel generators.

The Generator Facility will not be regularly occupied by staff; therefore, minimal amounts of potable water and electricity will be used at the Generator Facility. The connection of the Generator Facility is not anticipated to impact utility services to adjacent properties.

The proposed Generator Facility will be a positive impact for the local public service network through providing a back-up power source for the Draper WTP in the event of local utility outages.

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4.6 IMPACTS AND MITIGATION SUMMARY TABLE

Resource Area	Impact	Permits/Mitigation Required
Geology, Soils, and Seismicity	No impact to geology or seismicity. Minor short-term impact to soils.	Prepare a SWPPP that includes BMPS to minimize erosion and runoff.
Hazardous Materials	No impact.	Unusable equipment, debris and material shall be disposed of in an approved manner and location. In the event significant items (or evidence thereof) are discovered during implementation of the project, applicant shall handle, manage, and dispose of petroleum products, hazardous materials and toxic waste in accordance to the requirements and to the satisfaction of the governing local, state and federal agencies. Diesel fuel tanks and piping will be double-contained and a spill containment area will be constructed.
Air Quality	Short-term and localized minor impacts from equipment emissions. The hazardous air pollutant emissions of the generators will be below the major source threshold.	Fugitive dust control and abatement measures, and only using fuel-burning equipment as needed.
Waters of the U.S Including Wetlands	No impact.	None.
Floodplains	No impact.	None.
Threatened and Endangered Species and Critical Habitat	No impact to endangered species. Potential minor short-term impacts to migratory bird species.	Limit vegetation removal during nesting season (March – August). Deploy biological monitor if vegetation must be removed during nesting season.
Cultural Resources	No impact.	In the event that archeological deposits are exposed, construction will be halted and the OAS and the SHPO will be notified immediately for consultation.

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Resource Area	Impact	Permits/Mitigation Required
Environmental Justice	No impact.	None.
Noise	Short-term minor impact.	Construction activities will take place during normal business hours.
Traffic	Short-term minor impact.	Appropriate signage will be posted to any affected roadways during the construction process.
Public Service and Utilities	Long term positive impact.	None.

5.0 CUMULATIVE IMPACTS

According to CEQ regulations, cumulative impacts represent the “impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions, regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time (40 CFR 1508.7).” In accordance with NEPA and to the extent reasonable and practical, this EA considered the combined effect of the Proposed Action Alternative and other actions occurring or proposed in the vicinity of the project area.

Currently a new High Service Pump Station (HSPS) is under construction and estimated to be completed in April 2016. The new HSPS will be used to supplement the capacity of the existing high service pumps. The new HSPS will include four 2000-horse power vertical turbine pumps, a surge tank, and a facility to house the new equipment.

A future project planned in the vicinity of the project area includes three new 5-million gallon clear wells (No.4 – No.6) and clear well interconnecting piping. The clear wells will be used to store potable water before it enters the distribution lines.

Another future project is a HUD Community Development Block Grant (CDBG) funded improvement project to strengthen the electrical distribution system.

These local construction projects and the proposed project may have a cumulative temporary impact on local air quality by increasing criteria pollutants during construction activities and on water quality from sedimentation during construction. No other cumulative impacts are anticipated. No long term impacts to air quality, transportation, or noise concerns are anticipated with the proposed Generator Facility and local construction projects; therefore no mitigation is required.

6.0 AGENCY COORDINATION, PUBLIC INVOLVEMENT AND PERMITS

6.1 AGENCY COORDINATION

During the planning of the proposed action, the City of Oklahoma City has coordinated with the Oklahoma County Assessor, EPA, Oklahoma Historic Preservation Program, State Historic Preservation Office, Oklahoma Archeological Survey, Chickasaw Nation, Kiowa Tribe of Oklahoma, Osage Nation, NRCS, DEQ, and USFWS about potential impacts to the resource categories discussed above.

6.2 PUBLIC INVOLVEMENT

The City of Oklahoma City has included the public during the planning process for the Draper WTP Generator Facility. Public involvement activities for HUD funding, which is intended to be concurrent with FEMA funding, has included the following:

1. On September 16, 2014, the Citizens Committee for Community Development met and discussed submitting an application to the Oklahoma Department of Commerce for Community Development Block Grant for Disaster Recovery (CDBG-DR) Round II funding. The desired funding was for the Draper WTP improvements and general program administration totaling \$24,775,650.
2. On October 7, 2014, the Council Neighborhood Conservation Committee met and discussed approved submission of an application to the Oklahoma Department of Commerce for CDBG-DR Round II funding of the Draper WTP improvements and general program administration totaling \$24,775,650.
3. On October 10, 2014, a publication was placed in the *Oklahoman* about a Public Hearing and consideration of an application to the Oklahoma Department of Commerce for an allocation of \$24,776,650 for the Draper WTP improvements and general program administration funding.
4. On October 21, 2014, a Public Hearing took place approving submission of an application to the Oklahoma Department of Commerce for CDBG-DR Round II funding of the Draper WTP improvements and general program administration totaling \$24,775,650.

The City of Oklahoma will notify the public of the availability of the draft EA through the publication of a public notice in the local newspaper of record. The draft EA will be made available for public review at a physical location in the project area and on FEMA's web site (www.fema.gov). FEMA will conduct a 30-day public comment period commencing on the initial date of publication of the public notice. FEMA will consider and respond to all public comments in the Final EA. If no substantive comments are received, the Draft EA will become final and a FONSI will be issued for the project.

6.3 PERMITS

At this time, the City of Oklahoma City has not applied for permits on the Draper WTP Generator Facility. Once the funds and plans have been approved, the City of Oklahoma City will obtain needed permits, likely consisting of a permit for construction by the Department of Environmental Quality (DEQ), a City Building Permit, a Storm Water Quality permit from the City and DEQ, and an Air Quality permit from DEQ (as described in section 4.1.3 above).

8.0 REFERENCES

- Carollo Engineers, Inc. “Design Memorandum – Site Suitability/Alternatives Analysis for Generation Facility.” October 2014
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- United States Geological Survey. “Groundwater Atlas of the United States.” HA730-E Oklahoma and Texas, Regional Summary. <http://pubs.usgs.gov/ha/ha730>.
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9.0 LIST OF PREPARERS

This Environmental Assessment has been prepared in general accordance with FEMA's 2013 Guidelines for Preparing an Environmental Assessment.

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