

Eight-Step Planning Process for Floodplains and Wetlands

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| <p>Step 1: Determine whether the Proposed Action is located in a wetland and/or the 100-year floodplain, or whether it has the potential to affect or be affected by a floodplain or wetland.</p> | <p>Project Analysis: According to the Flood Insurance Rate Map for the project site (Panel Number 285251 003 B, effective November 16, 1983), the northwest corner of the proposed school facilities infringe on the 500-year floodplain (Flood Zone B), and the rest of the facilities are outside the 500-year floodplain (Flood Zone C). According to the Preliminary Digital Flood Insurance Rate Map (Map 28045C0353D), the northwest corner of the proposed school facilities infringe on the 100-year floodplain (Flood Zone AE), and the rest of the facilities are in the 500-year floodplain (Flood Zone X).</p> <p>According to National Wetlands Inventory Maps and a wetland delineation conducted by PAC Services LLC on March 20, 2008, approximately 2.33 acres of wetlands are located within the proposed project site.</p> |
| <p>Step 2: Notify public at earliest possible time of the intent to carry out an action in a floodplain or wetland, and involve the affected and interested public in the decision-making process.</p> | <p>Project Analysis: As part of the USACE Section 404 wetland permit process, a public notice was issued by the USACE notifying the public and applicable regulatory agencies regarding the proposed action's wetland impacts. According to Section 12(f) of the USACE's Environmental Assessment for the project (attached as part of the USACE Individual Wetland Permit; Appendix C), no responses were received by the public.</p> <p>Bay Waveland School District (BWSD) will notify the public of the availability of the draft EA through publication of a public notice in a newspaper of general circulation when the EA is made available for public review.</p> |
| <p>Step 3: Identify and evaluate practicable alternatives to locating the Proposed Action in a floodplain or wetland.</p> | <p>Project Analysis: The Applicant considered the following alternatives in selecting the proposed action:</p> <p><i>No Action Alternative:</i> Under the No Action Alternative, the North Bay Elementary School (NBES) would not be relocated and NBES faculty, staff, and students would continue to utilize temporary facilities on the existing NBES campus located in a coastal high hazard area within the limit of moderate wave action. Although no new construction would occur in the 100-year floodplain and no wetlands would be impacted, the risk to faculty, staff, and students at</p> |

the existing facilities would remain.

Reconstruct NBES in Place (not included in EA because it does not meet the purpose and need):

Under this Alternative, the NBES would be reconstructed on the original site, in a Zone AE and within a zone of moderate wave action in a coastal high hazard area. New construction would occur in the 100-year floodplain; the entire facility would be located in the 100-year floodplain.

Adjacent wetlands to the existing school site may be impacted. This alternative did not meet the purpose and need of rebuilding the school in an area that was less prone to flood-related damages.

Reconstruct NBES in a Location Nearby, Outside the Floodplain (not included in EA because it does not meet the purpose and need):

Under this Alternative, the NBES would be relocated to a site completely outside the 100-year and 500-year floodplains. Although there are locations in the BWSO that are outside of the 500-year floodplain, none are located in the area serviced by NBES.

Relocating NBES to one of these areas would require transporting students 5 miles or more outside of their current school district and co-locating them in other school districts. Impacts to wetlands could occur, but were not fully evaluated. This alternative did not meet the purpose and need because it did not serve the community.

Reconstruct NBES on Property Located Just North of Bay Waveland Middle School Already Owned By BWSO (Proposed Alternative):

Under this alternative, the NBES would be relocated to a site within the 500-year floodplain, which slightly infringes on the 100-year floodplain. A total of 1.43 acres of non-tidal wetlands would be impacted by the Proposed Alternative.

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| <p>Step 4: Identify the full range of potential direct or indirect impacts associated with the occupancy or modification of floodplains and wetlands, and the potential direct and indirect support of floodplain and wetland development that could result from the Proposed Action.</p> | <p>Project Analysis: Direct impacts to the floodplain include converting about 1 acre of 100-year floodplain and 12 acres of 500-year floodplain to areas outside the floodplain. This impact is permanent. The loss of floodplain area in the vicinity of the project is considered a minimal adverse effect; flooding in the Bay St. Louis area is predominantly driven by inadequate drainage as a result of flat topography, and tidal storm surge. Converting floodplain to non-floodplain as proposed in an area which is predominantly floodplain is not likely to result in appreciable increases in flood velocities or elevations upstream or downstream. Indirect impacts include supporting the ongoing occupancy of the floodplain that occurs in the Bay St. Louis area. Although the project does not encourage additional development within the floodplain (the net capacity of the school district is not increasing), the project will result in providing civic support to populations living in the floodplain.</p> <p>The project will result in converting 1.43 acres of non-tidal wetlands to urban upland. This impact is permanent. Although other impacts to wetlands in the vicinity may occur in the future, it is not likely that the proposed action would be the indirect cause of those impacts; the presence of the NBES at this site will not spur development targeting wetlands.</p> |
| <p>Step 5: Minimize the potential adverse impacts from work within floodplains and wetlands (identified under Step 4), restore and preserve the natural and beneficial values served by wetlands.</p> | <p>Project Analysis: To minimize impacts to the floodplain, the proposed school building would be constructed on the eastern portion of the site so that the majority of the structure would be located outside the 100-year floodplain. The proposed school building would be elevated above the ABFE with a finished floor elevation at 21 feet amsl.</p> <p>The applicant's design has minimized impacts to wetlands present on the site, reducing impacts to 1.43 acres. These impacts have been mitigated by purchasing wetland banking credits nearby as a condition of the Individual 404 Permit issued by the USACE.</p> |
| <p>Step 6: Re-evaluate the Proposed Action to determine: 1) if it is still practicable in light of its exposure to flood hazards; 2) the extent to which it will aggravate the hazards to others; 3)</p> | <p>Project Analysis: The Proposed Action remains practicable based on reducing the exposure of risk at the new school location, the minimal (if any) increase to flood elevations nearby, and abundant</p> |

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| <p>its potential to disrupt floodplain and wetland values.</p> | <p>nearby floodplains retaining their natural values.</p> |
| <p>Step 7: If the agency decides to take an action in a floodplain or wetland, prepare and provide the public with a finding and explanation of any final decision that the floodplain or wetland is the only practicable alternative. The explanation should include any relevant factors considered in the decision-making process.</p> | <p>Project Analysis: As part of the USACE Section 404 wetland permit process, a public notice was issued by the USACE notifying the public and applicable regulatory agencies regarding the proposed action’s wetland impacts. According to Section 12(f) of the USACE’s Environmental Assessment for the project, no responses were received by the public.</p> <p>A public notice will be published informing the public of FEMA’s decision to proceed with the project. This notice will include rationale for floodplain impacts; a description of all significant facts considered in making the determination; a list of the alternatives considered; a statement indicating whether the action conforms to State and local floodplain protection standards; a statement indicating how the action affects the floodplain; and a statement of how mitigation will be achieved.</p> |
| <p>Step 8: Review the implementation and post-implementation phases of the Proposed Action to ensure that the requirements of the EOs are fully implemented. Oversight responsibility shall be integrated into existing processes.</p> | <p>Project Analysis: This step is integrated into the NEPA process and FEMA project management and oversight functions.</p> |