

Draft Environmental Assessment

Hancock County Annex Complex

Hancock County, Mississippi

May 2009



FEMA

U.S. Department of Homeland Security
FEMA-1604-DR-MS
Transitional Recovery Office – Biloxi, MS

This document was prepared by



200 Orchard Ridge Drive, Suite 101
Gaithersburg, MD 20878

Contract No. HSFEHQ-06-D-0489
Task Order No. HSFEHQ-06-J-0003

15708003.00200

TABLE OF CONTENTS

1.0	INTRODUCTION	1
2.0	PURPOSE AND NEED	1
3.0	ALTERNATIVES	2
4.0	AFFECTED ENVIRONMENT AND IMPACTS	3
4.1	Geology and Soils	5
4.2	Water Resources	6
4.3	Transportation	9
4.4	Environmental Justice	10
4.5	Air Quality	10
4.6	Noise	11
4.7	Biological Resources	12
4.8	Cultural Resources	13
5.0	CUMULATIVE IMPACTS	14
6.0	PUBLIC INVOLVEMENT	15
7.0	AGENCY COORDINATION AND PERMITS.....	15
8.0	CONCLUSIONS	15
9.0	REFERENCES	17
Appendix A	Figures	
Appendix B	Agency Coordination	



ACRONYMS AND ABBREVIATIONS

ABFE	advisory base flood elevation
amsl	above mean sea level
APE	Area of Potential Effects
BMP	Best Management Practice
CAA	Clean Air Act
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CO	carbon monoxide
CWA	Clean Water Act
CZMA	Coastal Zone Management Act
dB	decibel
DFIRM	Digital Flood Insurance Rate Map
DNL	Day-Night Average Sound Level
EA	Environmental Assessment
EO	Executive Order
EPA	U.S. Environmental Protection Agency
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FPPA	Farmland Protection Policy Act
HMGP	Hazard Mitigation Grant Program
MDAH	Mississippi Department of Archives and History
MDEQ	Mississippi Department of Environmental Quality
MDMR	Mississippi Department of Marine Resources
MEMA	Mississippi Emergency Management Agency
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act
NISTAC	Nationwide Infrastructure Support Technical Assistance Consultants
NO ₂	nitrogen dioxide
NOAA	National Oceanic and Atmospheric Administration
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NWI	National Wetlands Inventory



ACRONYMS AND ABBREVIATIONS

O ₃	ozone
OSHA	Occupational Safety and Health Administration
PA	Public Assistance
Pb	lead
PM _{2.5}	particulate matter less than 2.5 microns
PM ₁₀	particulate matter less than 10 microns
SHPO	State Historic Preservation Office
SO ₂	sulfur dioxide
SWPPP	Storm Water Pollution Prevention Plan
THPO	Tribal Historic Preservation Office
USACE	U.S. Army Corps of Engineers
USDA	U.S. Department of Agriculture
USFWS	U.S. Fish and Wildlife Service



1.0 INTRODUCTION

On August 29, 2005, Hurricane Katrina struck the Mississippi Gulf Coast, causing extensive damage. Subsequently, a Presidential Disaster Declaration, FEMA-1604-DR-MS, was signed for Katrina.

Hancock County, Mississippi, has submitted an application for Federal Emergency Management Agency (FEMA) funding under FEMA's Public Assistance Program being administered in response to FEMA-1604-DR-MS for the proposed consolidation of county functions and services and the construction of a new Hancock County Annex Complex in Bay St. Louis, Hancock County, Mississippi.

In accordance with the Robert T. Stafford Disaster Relief and Emergency Assistance Act, PL 93-288, as amended, and implementing regulations at 44 Code of Federal Regulations (CFR) Part 206, FEMA is required to review the environmental effects of the proposed action prior to making a funding decision. This Environmental Assessment (EA) has been prepared in accordance with FEMA's National Environmental Policy Act (NEPA) regulations found in 44 CFR Part 10.

2.0 PURPOSE AND NEED

Katrina's storm surge and high winds severely damaged five Hancock County buildings in Bay St. Louis (Figure 1 in Appendix A). The damages exceeded the 50% repair/replacement ratio, meeting FEMA's criteria for demolition and replacement. In accordance with FEMA's policy for FEMA-1604-DR-MS, the buildings have been (or will be) demolished and the sites returned to grade and revegetated. Damaged Hancock County buildings included the following:

Hancock County Planning/Zoning/Purchasing Office

This facility included a 2,394-square-foot brick building located at 149-152 Main Street. The facility was located outside of the 100-year floodplain and the Advisory Base Flood Elevation (ABFE). For public health and safety reasons, this building has been demolished and the site returned to grade and revegetated.

Hancock County Tax Assessors Office

The Tax Assessors Office was located in a 7,387-square-foot, one-story building located at 161-165 Main Street. This facility was located outside of the 100-year floodplain and the ABFE. For public health and safety reasons, this building has been demolished and the site returned to grade and revegetated.

Hancock County Human Services Building

The Human Services building was a 21,612-square-foot building located at 3062 Longfellow Drive. This building housed multiple government agencies including the Health Department, Social Services, Employment Services, and Welfare and Cooperative Extension Service. This facility was located within the 100-year floodplain and the ABFE. For public health and safety reasons, this building has been demolished and the site returned to grade and revegetated.

National Guard Armory Building

The National Guard was housed in an 8,811-square-foot office/warehouse building located at 3016 Longfellow Drive. This facility was located within the 100-year floodplain and the ABFE. For public health and safety reasons, this building has been demolished and the site returned to grade and revegetated.

Save Our Children Building (County Court System/Emergency Operations Center)

The Save Our Children building is a 6,400-square-foot, one-story building located at 405 South Necaie Avenue. The building provided office space to the Hancock County Justice Court and Hancock County Chancery Court, a safe room for the Emergency Operations Center, and space for the County food pantry and Red Cross operations. This building is located outside of the 100-year floodplain and the ABFE, and is scheduled for demolition due to health and safety reasons. Once the building has been demolished, the site will be returned to grade and revegetated.

After Katrina, the majority of the county departments have been providing service in temporary office trailers located at 3068 Longfellow Drive in Bay St. Louis. The temporary trailers are of insufficient size and are not designed to serve as long-term replacements for the damaged buildings. Consequently, there is a need to provide Hancock County with suitable replacement facilities.

3.0 ALTERNATIVES

This section describes the alternatives that were considered in addressing the purpose and need stated in Section 2. Two alternatives were evaluated: the No Action Alternative, and the Proposed Action Alternative, which is the construction of a new Hancock County Annex Complex.

Alternative 1: No Action

Under the No Action Alternative, the Hancock County Annex Complex would not be rebuilt. The Hancock County government agencies that lost facilities as a result of Hurricane Katrina would continue to utilize temporary facilities. In accordance with FEMA's relocation policy for FEMA-1604-DR-MS, the Save Our Children building would be demolished and the site returned to grade and revegetated.

Alternative 2: Construction of a New Hancock County Annex Complex (Proposed Action)

Hancock County proposes to construct a new Hancock County Annex Complex on an approximately 10.4-acre site that is located on Highway 90 in Bay St. Louis (Figures 1 and 2 in Appendix A). The proposed project site is located outside of the 100-year floodplain and the ABFE in a moderately developed commercial and residential area. The proposed project site is bound to the north by Highway 90 and commercial properties, to the south by a drainage ditch, residential properties and Washington Street, to the west by commercial properties including a hotel and restaurant, and to the east by Drinkwater Road and commercial and residential properties. Most of the proposed project site is a fenced vacant lot with gravel and light asphalt surfaces that formerly held 175 FEMA house trailers used as temporary residences after Hurricane Katrina. An abandoned, approximately 2,750-square-foot single story building, formerly the Gulf South Urgent Care facility, is located on the northern portion of the site, along Highway 90. The FEMA trailers were reportedly removed in the summer of 2008 and the Gulf



South Urgent Care facility was vacated in February of 2009. A drainage ditch, which flows in a westerly direction, extends along the southern boundary, separating an approximately 0.7-acre wooded area from the overall project site.

The former Gulf South Urgent Care facility would be demolished to allow for construction of the new complex, which would consist of two buildings: the Hancock County Government Annex Building and the Human Services Building. The Annex Building is proposed to be approximately 28,600 square feet and the Human Services Building is proposed to be approximately 21,600 square feet. The proposed complex is considered a critical action under FEMA regulations, requiring both buildings to be elevated above the 500-year floodplain. Therefore, the County proposes to elevate both buildings to a finished floor elevation of 23.1 feet above mean sea level (asml).

Hancock County is proposing to utilize Hazard Mitigation Grant Program (HMGP) funds to construct both buildings with a wind retrofit 404 HMGP option. The wind retrofit option would include hardened walls, impact-resistant glass, shutters, an elevated heating, ventilation, and cooling system, and wall-to-roof fastening/connection systems.

The construction of a 305-space parking lot is included in the proposed project (Figure 3 in Appendix A). The proposed complex would also provide sufficient space for a County data storage center, allowing Hancock County to consolidate data and records recovered from the five damaged County office buildings.

In addition, the 0.7-acre wooded lot, located on the southern portion of the site, would be cleared, grubbed, and graded to create an overflow parking lot for the complex. The applicant proposes to construct a small bridge across the drainage ditch to provide pedestrian access to the complex; no modifications to the drainage ditch are proposed. Vehicular access to the site would be provided via Highway 90, Drinkwater Road, and the overflow parking lot on Washington Street. The proposed complex would connect to existing utilities (municipal water, sewer, and power) that currently provide service to buildings on Highway 90.

4.0 AFFECTED ENVIRONMENT AND IMPACTS

The following table summarizes the potential impacts of the Proposed Action Alternative and conditions or mitigation measures to offset those impacts. Following the summary table, any resource areas for which potential impacts were identified, as well as high priority resources including floodplains, waters of the U.S., environmental justice, biological resources, and cultural resources, will be discussed in greater detail.

Affected Environment	Impacts	Mitigation
Geology and Soils	No impacts to geology are anticipated. Short-term minor impacts to soils may occur during demolition and construction.	Appropriate Best Management Practices (BMPs), such as installing silt fences and revegetating bare soils, would minimize runoff.

Affected Environment	Impacts	Mitigation
Surface Water	Temporary short-term impacts to off-site surface waters are possible during demolition and construction activities.	The applicant will need a Stormwater Pollution Prevention Plan (SWPPP) and a National Pollutant Discharge Elimination System (NPDES) permit for the construction project. Appropriate BMPs, such as installing silt fences and revegetating bare soils, would minimize runoff.
Groundwater	No impacts to groundwater are anticipated.	None.
Floodplains	No adverse impacts to floodplains would occur. The proposed project site and demolition site are located outside the 100-year floodplain and ABFE.	None.
Waters of the U.S. including Wetlands	Short-term impacts to the on-site drainage ditch and off-site wetlands are possible during construction and demolition activities.	Appropriate BMPs, such as installing silt fences and revegetating bare soils, would minimize runoff to wetland areas.
Transportation	There would be a minor temporary increase in the volume of construction and demolition traffic on roads in the immediate vicinity of the proposed project sites. There would be minor long-term impacts to traffic levels in the vicinity of the new complex.	Construction vehicles and equipment would be stored on-site during project construction and demolition and appropriate signage would be posted on affected roadways. Traffic devices including signal lights and/or stop signs may be installed during or on completion of construction and demolition to mitigate minor long-term impacts to traffic levels.
Public Health and Safety	None.	All construction and demolition activities would be performed using qualified personnel and in accordance with the standards specified in Occupational Safety and Health Administration (OSHA) regulations. Appropriate signage and barriers would be in place prior to construction activities to alert pedestrians and motorists.

Affected Environment	Impacts	Mitigation
Hazardous Materials	No hazardous materials or waste impacts are anticipated. A Phase I Environmental Site Assessment conducted in March of 2009 revealed no evidence of recognized environmental conditions in connection with the proposed project site or surrounding parcels.	If any asbestos-containing materials, lead-based paint, or other hazardous materials are found during demolition or other construction activities, the applicant must comply with all federal, state, and local abatement and disposal requirements under the National Emission Standards of Hazardous Air Pollutants (NESHAP) program.
Socioeconomic Resources	No adverse socioeconomic impacts are anticipated.	None.
Environmental Justice	No disproportionately high or adverse effect on minority or low-income populations is anticipated.	None.
Air Quality	Short-term impacts to air quality would occur during the demolition and construction period.	Construction and demolition contractors would be required to water down demolition and construction areas when necessary; fuel-burning equipment running times would be kept to a minimum; engines would be properly maintained.
Noise	Short-term noise impacts would occur at the proposed project site during the demolition and construction period.	Construction and demolition would occur during normal work hours and equipment would meet all local, state, and federal noise regulations.
Biological Resources	Most of the 10.4-acre proposed construction site was previously disturbed and held temporary FEMA trailers; about 0.7 acre of the proposed project site is wooded and would be cleared. No adverse impacts to protected species are anticipated.	None.
Cultural Resources	No impacts to cultural resources are anticipated	None.

4.1 GEOLOGY AND SOILS

The proposed project site is located within the East Gulf Coastal Plain. This broad physiographic designation extends from the Gulf of Mexico to northern Tennessee and from eastern Louisiana to western Florida (USGS 2008). The proposed project site is located within the Coastal Flatwoods ecological region of the East Gulf Coastal Plain, an area approximately 10 to 15 miles wide that parallels the Gulf Coast. Coastal Flatwoods are characterized by level terraces and clays, sands, and gravels (Stewart 2003). The southern limit of the Coastal Flatwoods is bordered by saltwater marshes. Slow deltaic sedimentation from the Pearl and Pascagoula Rivers merged



with marine deposits near shore, causing beach and dune deposits during the Holocene period. Elevations within the proposed project site range from 11 to 19 feet amsl; elevations are highest at the southeastern corner of the proposed project site (EDR 2009).

The soils at the proposed project site consist of Poarch fine sandy loam (0 to 2 percent slopes) on most of the site, with Harleston fine sandy loam (0 to 2 percent slopes) on the southern side of the site and Escambia loam (0 to 2 percent slopes) in the northeastern corner of the site. Poarch and Harleston soils are moderately well-drained to well-drained soils with relatively high water movement in the most restrictive layer. Escambia soils are somewhat poorly drained with moderately low water movement in the most restrictive layer. All three soils are considered hydric soils.

The Farmland Protection Policy Act (FPPA) states that federal agencies must “minimize the extent to which federal programs contribute to the unnecessary conversion of farmland to nonagricultural uses...” The proposed project site and the Save Our Children demolition site are both within the City of Bay St. Louis limits (NRCS, 2009); therefore, the FPPA does not apply.

No Action Alternative – Under the No Action Alternative, no construction would occur at the Hancock County Annex Complex site and there would be no impacts to geology or soils at that site. During the demolition of the Save Our Children building, short-term, minor impacts to previously disturbed soils would occur. To minimize the potential for erosion, appropriate BMP’s would be implemented at the demolition site; BMP’s would include installation of silt fences and revegetation of soils.

Proposed Action Alternative – Under the Proposed Action Alternative, no impacts to geology are anticipated because construction would only disturb the surface of the proposed project site. Short-term, minor impacts to soils would occur during the construction period. The site work would utilize cut and fill with existing topography along with import of structural fill to achieve the 23.1 foot finished floor elevation. To minimize the potential for erosion, appropriate BMPs would be implemented at the proposed project site; BMPs would include the installation of silt fences and revegetation of soils.

During the demolition of the Save Our Children building, short-term, minor impacts to previously disturbed soils would occur. To minimize the potential for erosion, appropriate BMP’s would be implemented at the demolition site; BMP’s would include installation of silt fences and revegetation of soils.

On March 13, 2009, a letter requesting project review was sent to the U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) (Appendix B). A response was received from the NRCS on April 6, 2009, confirming that an FPPA determination is not required within city limits (Appendix B).

4.2 WATER RESOURCES

4.2.1 Surface Water

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.



The proposed project site is located approximately 0.16 mile south of an unnamed tributary of Watts Bayou, 1.5 miles north of the Mississippi Sound, and 1.6 miles southwest of St. Louis Bay. The property is relatively flat with an elevation of slightly less than 20 feet amsl with a slight slope downward to the southwest. Stormwater runoff would follow surface topography and flow toward the southwest and into the drainage ditch on and adjacent to the south side of the site (EDR, 2009).

A site visit was conducted by Nationwide Infrastructure Support Technical Assistance Consultants (NISTAC) on March 2, 2009. With the exception of the drainage ditch on the southern boundary of the site, two areas of shallow standing water (less than 6 inches deep) were observed in the northeast and northwest sections of the site. Both of these areas of standing water appeared to be less than 400 square feet in size and appeared to be located in areas where there had been disturbance by prior grading activity that resulted in the accumulation of water from a recent rain event. A small soil pile was located adjacent to the standing water in the northwest corner of the site. The drainage ditch along the southern boundary of the site had approximately 1 to 2 feet of water at the time of the site visit and was observed to flow in a westerly direction toward Watts Bayou, which is located approximately 1 mile northwest of the property (NISTAC, 2009).

No Action Alternative – Under the No Action Alternative, no construction would occur and there would be no adverse impacts to surface water at the Hancock County Annex Complex site.

Proposed Action Alternative – Under the Proposed Action Alternative, minor short- and long-term impacts to on site and off site surface waters would occur due to transport of sediment from disturbed soils by stormwater runoff during demolition and construction and increased amount of impervious surfaces after completion of the proposed development. Surface water would drain to the drainage ditch on the southern boundary of the facility. The storm drain system would collect parking lot and roof runoff which would flow to the south. Major runoff would flow toward the southeast corner of the proposed project site where a storm water retention pond is proposed.

On March 13, 2009, letters requesting project review were sent to U.S. Environmental Protection Agency (EPA), Region 4, Water Management Division; Mississippi Department of Environmental Quality; and Mississippi Soil and Water Conservation Commission (see Appendix B). No responses have been received to date.

The applicant is required to obtain an NPDES permit from MDEQ and to prepare a SWPPP which includes BMPs to minimize erosion of soil from the construction area and reducing off-site sediment transport.

4.2.2 Floodplains

Executive Order (EO) 11988 (Floodplain Management) requires federal agencies to avoid direct and 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. Consistent with EO 11988, both conventional FIRMs and Preliminary Digital FIRMs (DFIRMs) were examined during the preparation of this EA. According to the conventional FIRM (Community Panel

Number 285251 0003 B; FEMA, 1983), the proposed site is located in Zone C, an area of minimal flooding outside the 100-year floodplain.

According to the Preliminary DFIRM (Map Number 28045C0353D; MDEQ, 2007) the proposed site is located in Zone X, an area of minimal flooding outside the 100-year floodplain.

FEMA has also developed ABFE Maps based on a flood frequency analysis completed by FEMA; these maps update the flood risk data with information on storms that have occurred in the past 25+ years, including (but not limited to) Hurricane Katrina. ABFE Map Numbers MS-G10 and MS-F10 depict the proposed project area as being outside the 100-year floodplain (FEMA, 2006). The proposed project site is outside of the coastal high hazard zone based on post-Katrina DFIRM maps. The Save Our Children building is outside of the 100-year floodplain and ABFE.

No Action Alternative – Under the No Action Alternative, no construction would occur and there would be no impacts to floodplains. The demolition site is located outside of the 100-year floodplain and ABFE.

Proposed Action Alternative – Under the Proposed Action Alternative, no adverse impacts to the floodplain would occur. The proposed construction and demolition sites are located outside of the 100-year floodplain and ABFE. In accordance with the National Flood Insurance Program (NFIP) and FEMA’s floodplain management requirements (44 CFR Part 9.4[c]), the proposed complex is considered a critical action, requiring both buildings to be elevated above the 500-year floodplain. Therefore, the County proposes to elevate both buildings above the 500-year floodplain to a finished floor elevation of 23.1 feet asml.

4.2.3 Waters of the U.S. including Wetlands

The U.S. Army Corps of Engineers (USACE) regulates the discharge of dredged or fill material into waters of the U.S., including wetlands, pursuant to Section 404 of the CWA. Additionally, EO 11990 (Protection of Wetlands) requires federal agencies to avoid, to the extent possible, adverse impact of wetlands.

A review of the National Wetlands Inventory (NWI) map for the Hancock County Annex Complex project site does not depict any wetlands on the property, but shows freshwater forested wetlands to the southeast of the proposed project site, along Washington Street (USFWS, 2007). A wetland determination was conducted by NISTAC and FEMA biologists on March 2 and April 21, 2009, and confirmed that no wetlands occur on the proposed project site. The methods and procedures used for this determination are in accordance with the 1987 *Corps of Engineers Wetlands Delineation Manual* (USACE, 1987). The USACE manual requires the presence of all three parameters (greater than 50% dominance of hydrophytic vegetation, evidence of hydric soils, and presence of hydrologic indicators) for an area to be considered a wetland. Although the proposed construction site contains hydric soils and some indicators of hydrology (standing water), no dominance of wetland vegetation was observed on the site; therefore, the site does not contain wetlands. A ditch runs parallel to the fence on the southern portion of the site; this ditch held water at the time of the site visit and would be considered waters of the U.S. and therefore regulated by the USACE.

The NWI map for the Save Our Children demolition site does not depict any wetlands on the property, but shows freshwater forested wetlands to the southwest of the demolition site, across South Nacaise Avenue (USFWS, 2007).

The Coastal Zone Management Act (CZMA) enables coastal states, including Mississippi, to designate state coastal zone boundaries and develop coastal management programs to improve protection of sensitive shoreline resources and guide sustainable use of coastal areas. According to the National Oceanic and Atmospheric Administration (NOAA), the proposed project site is located within the Mississippi Coastal Zone (NOAA, 2004).

No Action Alternative – Under the No Action Alternative, no construction would occur and there would be no impacts to waters of the U.S., including wetlands. Short-term impacts to off-site wetland areas may occur during demolition due to earth disturbance and erosion. Appropriate BMPs would be implemented at the demolition site to minimize soil erosion and reduce off-site sediment transport to adjacent wetland areas.

Proposed Action Alternative – Under the Proposed Action Alternative, no direct impacts to waters of the U.S., including wetlands, would occur. The ditch in the southern portion of the Hancock County Annex Complex site would be spanned by a pedestrian walkway and no impacts to this ditch would occur. Short-term impacts to the on-site ditch and off-site wetland areas may occur during construction and demolition due to earth disturbance and erosion. Appropriate BMPs would be implemented at the proposed construction and demolition sites to minimize soil erosion and reduce off-site sediment transport to adjacent surface waters and wetland areas.

On March 13, 2009, letters requesting project review were sent to the USACE Mobile District, Planning Division, and the Mississippi Department of Marine Resources (MDMR). No responses have been received to date.

4.3 TRANSPORTATION

The proposed project site is located to the southeast of the intersection of Highway 90 and Drinkwater Road. Access to the site would be provided from both Highway 90 and Drinkwater Road (Figure 3 in Appendix A). Washington Street, which borders portions of the southern property boundary, would provide access to the proposed overflow parking lot.

No Action Alternative – Under the No Action Alternative, there would be a minor temporary increase in the volume of construction traffic on roads in the immediate vicinity of the Save Our Children demolition site that could potentially result in a slower traffic flow for the duration of the demolition. To mitigate potential delays, demolition vehicles and equipment would be stored on site during project demolition and appropriate signage would be posted on affected roadways.

Proposed Action Alternative – Under the Proposed Action Alternative, a new road providing access from Highway 90 would be constructed on the northeast portion of the proposed project site and a new road providing access from Drinkwater Road would be constructed on the western portion of the proposed project site. The new access roads would connect the two proposed onsite buildings and provide access to a proposed 305-space parking lot included in the proposed project. A pedestrian bridge would be constructed across the drainage ditch to provide access from the overflow parking lot on Washington Street to the proposed complex.

There would be a minor temporary increase in the volume of construction traffic on roads in the immediate vicinity of the proposed Hancock County Annex Complex construction site and the Save Our Children demolition site that could potentially result in a slower traffic flow for the duration of the construction phase. To mitigate potential delays, construction vehicles and equipment would be stored on site during project construction and appropriate signage would be posted on affected roadways.

Minor long-term impacts to traffic levels on Highway 90, Drinkwater Road, and Washington Street, as well as adjacent residential neighborhoods, would occur due to Hancock County employees and the public accessing the new Hancock County Annex Complex. Traffic devices including signal lights and/or stop signs may be installed during or on completion of construction to mitigate the minor long-term impacts to traffic levels.

On March 13, 2009, a letter requesting project review was sent to the Mississippi Department of Transportation, Environmental Division; no response has been received to date.

4.4 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 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 were reviewed to determine if the proposed action would have a disproportionately high and adverse impact on minority or low-income persons.

No Action Alternative – Under the No Action Alternative, the Hancock County Annex Complex would not be constructed; therefore, there would be no adverse impacts on minority or low-income populations. The Hancock County government agencies and the public would continue to utilize temporary facilities.

Proposed Action Alternative – Under the Proposed Action Alternative, there would be no disproportionately high or adverse impacts on minority or low-income populations. The development of the proposed Hancock County Annex Complex would benefit all populations in the community by providing a new, consolidated facility.

4.5 AIR QUALITY

The Clean Air Act (CAA) requires that states adopt ambient air quality standards. The standards have been established to protect the public from potentially harmful amounts of pollutants. Under the CAA, the EPA establishes primary and secondary air quality standards. Primary air quality standards protect the public health, including the health of “sensitive populations, such as people with asthma, children, and older adults.” Secondary air quality standards protect public welfare by promoting ecosystems health, and preventing decreased visibility and damage to crops and buildings. EPA has set National Ambient Air Quality Standards (NAAQS) for the following six criteria pollutants: ozone (O₃), particulate matter (PM_{2.5}, PM₁₀), nitrogen dioxide (NO₂), carbon monoxide (CO), sulfur dioxide (SO₂), and lead (Pb). According to MDEQ, the entire state of Mississippi is classified as in attainment, meaning that criteria air pollutants do not exceed the NAAQS (MDEQ, 2002).

No Action Alternative – Under the No Action Alternative, short-term impacts to air quality could occur during demolition of the Save Our Children building. To reduce temporary impacts to air quality, the demolition contractors would be required to water down construction areas when necessary to minimize particulate matter and dust. Emissions from fuel-burning internal combustion engines (e.g., heavy equipment and earthmoving machinery) could temporarily increase the levels of some of the criteria pollutants, including CO, NO₂, O₃, PM₁₀, and non-criteria pollutants such as volatile organic compounds. To reduce the emission of criteria pollutants, fuel-burning equipment running times would be kept to a minimum and engines would be properly maintained.

Proposed Action Alternative – Under the Proposed Action Alternative, short-term impacts to air quality could occur during demolition and construction. To reduce temporary impacts to air quality, the construction contractors would be required to water down construction areas when necessary to minimize particulate matter and dust. Emissions from fuel-burning internal combustion engines (e.g., heavy equipment and earthmoving machinery) could temporarily increase the levels of some of the criteria pollutants, including CO, NO₂, O₃, PM₁₀, and non-criteria pollutants such as volatile organic compounds. To reduce the emission of criteria pollutants, fuel-burning equipment running times would be kept to a minimum and engines would be properly maintained.

4.6 NOISE

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 the human ear can hear. The Day-Night Average Sound Level (DNL) 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. EPA guidelines, and those of many other federal agencies, state that outdoor sound levels in excess of 55 dB DNL are “normally unacceptable” for noise-sensitive land uses including residences, schools, or hospitals (EPA, 1974). The residential properties to the south and east and the hotel and restaurant to the west of the proposed Hancock County Annex Complex are the primary noise-sensitive receptors.

No Action Alternative – Under the No Action Alternative, short-term increases in noise levels are anticipated during the demolition of the Save Our Children building. To reduce noise impacts, demolition activities would take place between normal business hours to the extent possible and would not occur on Sundays or Federal holidays. Equipment and machinery utilized on the proposed project site would meet all local, state, and federal noise regulations.

Proposed Action Alternative – Under the Proposed Action Alternative, short-term increases in noise levels are anticipated during the demolition and construction period. To reduce noise impacts, construction activities would take place between normal business hours to the extent possible and would not occur on Sundays or Federal holidays. Equipment and machinery utilized on the proposed project site would meet all local, state, and federal noise regulations. Normal activities at the proposed Hancock County Annex Complex would not generate noise levels high enough to violate noise regulations and are unlikely to adversely affect the nearby residences, hotel, or restaurant. Therefore, no long-term negative impacts from increased noise levels are anticipated.

4.7 BIOLOGICAL RESOURCES

The proposed project site consists mainly of previously disturbed land. At the time of the site visit, the site was mainly covered with a limestone gravel parking lot and an unoccupied former medical clinic building on the northern portion of the proposed site. A small disturbed area was observed on the northwestern portion of the property that contained standing water and exposed soil. No access was provided to this portion of the subject property, and the presence of hydrophytic vegetation could not be confirmed. The proposed project site is level and is surrounded by a chain-link fence with a privacy screen. A small ditch runs parallel to the fence on the southern portion of the site. On the other side of this ditch is a small wooded area about 0.7 acre in size. Dominant vegetation in this area is water oak (*Quercus nigra*) and blackberry (*Rubus* sp.).

The U.S. Fish and Wildlife Service (USFWS) lists the following federally endangered and threatened species for Hancock County (USFWS, 2008):

Common Name	Scientific Name	Status
Louisiana black bear	<i>Ursus americanus luteolus</i>	T
Piping plover	<i>Charadrius melodus</i>	T(CH)
Gopher tortoise	<i>Gopherus polyphemus</i>	T
Green turtle	<i>Chelonia mydas</i>	T
Loggerhead turtle	<i>Caretta caretta</i>	T
Gulf sturgeon	<i>Acipenser oxyrhynchus desotoi</i>	T(CH)
Inflated heelsplitter	<i>Potamilus inflatus</i>	T
Louisiana quillwort	<i>Isoetes louisianensis</i>	E
Leatherback turtle	<i>Dermochelys comacea</i>	E
Kemp's Ridley turtle	<i>Lepidochelys kempii</i>	E
West Indian manatee	<i>Trichechus manatus</i>	E
Brown pelican	<i>Pelecanus occidentalis</i>	E
T = threatened, E = endangered, (CH) = critical habitat		

The site visit confirmed that the proposed project site does not contain habitat for any federally listed species; therefore, it is unlikely that any threatened or endangered species are present.

No Action Alternative – Under the No Action Alternative, the Save Our Children building would be demolished and the site returned to grade and revegetated.

Proposed Action Alternative – Under the Proposed Action Alternative, the entire construction site would be graded and filled to a finished floor elevation of 23.1 feet amsl. The ditch along the southern border would be spanned with a pedestrian walkway. Most of the site is previously

disturbed; therefore, impacts to biological resources would consist of clearing 0.7 acre of wooded area on the southern portion of the site. No impacts to protected species are anticipated. The Save Our Children building would be demolished and the site returned to grade and revegetated. On March 13, 2009, a letter requesting project review was sent to the U.S. Fish and Wildlife Service, Jackson Field Office; no response has been received to date.

4.8 CULTURAL RESOURCES

Section 106 of the National Historic Preservation Act (NHPA), as amended, and implemented by 36 CFR Part 800, requires federal agencies to consider the effects of their actions on historic properties and provide the Advisory Council on Historic Preservation (ACHP) an opportunity to comment on federal projects that would have an effect on historic properties prior to implementation. Historic properties are defined as archeological sites, standing structures, or other historic resources listed in or eligible for listing in the National Register of Historic Places (NRHP).

A FEMA Archeologist and a FEMA Architectural Historian, both qualified in their respective disciplines under the Secretary of the Interior's Professional Qualification Standards (36 CFR Part 61), conducted an assessment of the project's potential to affect historic properties within the Area of Potential Effects (APE). 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. For archaeological resources, the APE consists of the former and proposed project sites; for above-ground historic properties, the APE is extended out to a 0.5-mile radius around the former and proposed project sites. This APE was previously established through FEMA consultation with the Mississippi State Historic Preservation Office (SHPO).

On March 3 and April 17, 2009, a FEMA archeologist visited the site to determine if any historic properties or archaeological sites were visibly present within the APE. The site visit revealed that no above ground historic properties are present within the APE and the site is not located within the boundaries of a National Register Historic District. The potential for existing and intact below-ground cultural resources is low at the proposed project site due to geographic location, ground disturbance, data from prior phase 1 surveys in the immediate area (83-134 and 84-019) and the lack of recorded sites within a 2-mile radius of the APE. Survey #83-134 bordered the site along its western side and produced negative results. Based on September 26, 2005, Section 106 consultation with SHPO for the establishment of a temporary trailer park on the proposed project site, FEMA does not recommend a Phase 1 Archaeological Investigation be conducted on the proposed project site.

FEMA conducted a records review and site visit of the former building sites, of which the National Guard Armory and the Save Our Children sites were the only properties of potential historical significance. FEMA Historic Preservation staff had evaluated the National Guard Armory on June 9, 2006, and determined that the structure, built circa 1965, did not meet the 50-year criterion or level of exceptional importance to be considered eligible for listing in the National Register of Historic Places.

The Save Our Children building, located at 405 South Nacaise Ave, is a one-story, rectangular building, with a front gable roof, and is constructed of rusticated concrete block. In a letter to

Mississippi Department of Archives and History (MDAH) dated March 20, 2009, FEMA recognized that the Save Our Children structure meets the age requirement to contribute to the Beach Boulevard Historic District, but determined that it has been rendered a non-contributing structure, as long-term neglect and storm damage have destroyed the architectural integrity of the building. The potential for existing and intact below ground cultural resources is considered low at this location due to geographic location, previous ground disturbance, and the lack of recorded archeological sites within a 2-mile radius of the APE.

No Action Alternative – Under the No Action Alternative, there would be no impacts to archeological or historic architectural resources. In a letter dated April 14, 2009, MDAH concurred that no cultural resources are likely to be affected by the demolition of the Save Our Children building.

Proposed Action Alternative – Under the Proposed Action Alternative, no impacts to archeological or historic architectural resources are anticipated. In agency consultation letters dated March 26, 2009, to the SHPO and Mississippi Band of Choctaw Indians Tribal Historic Preservation Office (THPO), FEMA requested project review and determined that “No Historic Properties would be Affected” by the proposed undertaking. In a letter dated April 14, 2009, MDAH concurred that no cultural resources are likely to be affected by the proposed project. No response from THPO has been received to date.

FEMA recommends the use of Lower-Impact Demolition Requirements, developed by FEMA and the Mississippi Emergency Management Agency (MEMA), for the demolition of the Save Our Children building.

If during the course of work, archeological artifacts (prehistoric or historic) or human remains are discovered, the applicant shall stop work in the vicinity of the discovery and take all reasonable measures to avoid or minimize harm to the finds. The applicant shall inform their Public Assistance (PA) program contacts in FEMA, who will in turn contact FEMA Historic Preservation Staff. Work would not proceed until FEMA Historic Preservation Staff have completed consultation with the SHPO and the THPO.

5.0 CUMULATIVE IMPACTS

According to the Council on Environmental Quality (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 proposed project site.

Bay St. Louis and the entire Mississippi Gulf coast are undergoing recovery efforts after Hurricane Katrina caused extensive damages. The recovery efforts in the area include demolition, reconstruction, and new construction. These projects and the proposed project may have cumulative temporary impacts on air quality, noise, traffic, and surface water in Bay St. Louis during construction activities. No other cumulative effects are anticipated.

6.0 PUBLIC INVOLVEMENT

FEMA is the lead federal agency for conducting the NEPA compliance process for the proposed project in Bay St. Louis, Mississippi. It is the goal of the lead agency to expedite the preparation and review of NEPA documents and to be responsive to the needs of the community and the purpose and need of the proposed action while meeting the intent of NEPA and complying with all NEPA provisions.

Hancock County will notify the public of the availability of the draft EA through publication of a public notice in a local newspaper. FEMA will conduct an expedited public comment period commencing on the initial date of publication of the public notice.

7.0 AGENCY COORDINATION AND PERMITS

The following agencies and organizations were contacted by letter requesting project review during the preparation of this EA. Responses received to date are included in Appendix B.

- U.S. Army Corps of Engineers Mobile District, Planning Division
- U.S. Department of Agriculture, Natural Resources Conservation Service
- U.S. Environmental Protection Agency, Region 4, Water Management Division
- U.S. Fish and Wildlife Service, Jackson Field Office
- Mississippi Department of Archives and History
- Mississippi Band of Choctaw Indians
- Mississippi Department of Agriculture and Commerce
- Mississippi Department of Marine Resources, Bureau of Wetlands Permitting
- Mississippi Department of Transportation, Environmental Division
- Mississippi Soil and Water Conservation Commission
- Office of Pollution Control, Environmental Permits Division

In accordance with applicable local, state, and federal regulations, the applicant would be responsible for acquiring any necessary permits prior to commencing construction at the proposed project site.

8.0 CONCLUSIONS

No impacts to geology, groundwater, floodplains, public health and safety, hazardous materials, socioeconomic resources, environmental justice, or cultural resources are anticipated under the Proposed Action Alternative.

Approximately 0.7 acre of wooded area would be cleared for construction; no other biological resources, including protected species, would be adversely affected. During the demolition and construction period, short-term impacts to soils, on-site and off-site surface water, off-site wetlands, transportation, air quality, and noise are anticipated. Short-term impacts will be mitigated utilizing erosion and sediment control BMPs, appropriate signage, and proper

equipment maintenance. Minor, long-term minor increases in traffic levels would occur due to Hancock County employees and the public accessing the new Hancock County Annex Complex.



9.0 REFERENCES

- Environmental Data Resources, Inc (EDR). 2009. EDR Radius Map Report with GeoCheck, Hancock County Annex, Highway 90, Bay St. Louis, Mississippi, 39520, Inquiry # 2435612.2s. March 5, 2009.
- Federal Emergency Management Agency (FEMA). 1983. *Flood Insurance Rate Map, City of Bay St. Louis, Mississippi, Hancock County. Community Panel Number 285251 0003 B.* Map Revised November 16, 1983.
<http://msc.fema.gov/webapp/wcs/stores/servlet/FemaWelcomeView?storeId=10001&catalogId=10001&langId=-1>. Accessed March 19, 2009.
- FEMA. 2006. *Hurricane Katrina Surge Inundation and Advisory Base Flood Elevation Maps, Jackson County, Mississippi.* Map Numbers MS-F10 and MS-G10. March 15.
http://www.fema.gov/hazard/flood/recoverydata/katrina/katrina_ms_hancock.shtm
Accessed March 20, 2009.
- The Hancock County Assessor's Office Geoportal website.
<http://www.geoportalmaps.com/atlas/hancock/viewer.htm> Accessed March 18, 2009
- Mississippi Department of Environmental Quality (MDEQ). 2002. *New Air Quality Standards.*
http://deq.state.ms.us/MDEQ.nsf/page/Air_NewAirQualityStandardsandAttainment?OpenDocument. Accessed November 12, 2008.
- MDEQ. 2007. *Federal Emergency Management Agency Preliminary Flood Insurance Rate Map, Hancock County, Mississippi and Incorporated Areas.* Map Number 28045C0353D. <http://geology.deq.ms.gov/floodmaps/status.aspx?county=Hancock>. Accessed March, 2009.
- National Oceanic and Atmospheric Administration (NOAA). 2004. *State Coastal Zone Boundaries.* <http://coastalmanagement.noaa.gov/mystate/docs/StateCZBoundaries.pdf>. Accessed November 12, 2008.
- Nationwide Infrastructure Support Technical Assistance Consultants (NISTAC). 2009. *Draft Phase I Environmental Site Assessment, Hancock County Annex Complex.* Prepared for FEMA Transitional Recovery Office, Biloxi, MS.
- Stewart, R.A. 2003. Physiographic Regions of Mississippi. Handout, Department of Biological Sciences, Delta State University. 6 pp.
<http://www.marshdoc.com/physiography/physiography.html>. Accessed November 18, 2008.
- U.S. Army Corps of Engineers (USACE). 1987. *Corps of Engineers Wetland Delineation Manual.*
- U.S. Census Bureau. 2000. Population and Income. Accessed March 31, 2009.
- U.S. Environmental Protection Agency (EPA). 1974. *EPA Identifies Noise Levels Affecting Health and Welfare.* <http://www.epa.gov/history/topics/noise/01.htm>.
- U.S. Fish and Wildlife Service (USFWS). 2007. *National Wetlands Inventory Maps.*
<http://wetlandsfws.er.usgs.gov/wtlnds/launch.html>. Accessed March, 2009.

USFWS. 2008. *Mississippi: List of Threatened and Endangered Species by County*. June.

United States Geological Survey (USGS). 2008. Physiographic Regions.

<http://tapestry.usgs.gov/features/13coastalplain.html/>. Accessed March 27, 2008.



Appendix A
Figures

Appendix B
Agency Coordination