

Eight-Step Planning Process for Floodplains and Wetlands

<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 2009 DFIRM, the proposed relocation site for the relocation of the Santa Maria de la Mer Senior Living Center is located within Flood Zone X, which is outside of the 100-year and 500-year floodplain.</p> <p>According to National Wetlands Inventory (NWI) mapping and site visits conducted by FEMA and NISTAC biologists on June 24, 2009, and September 1, 2009, one palustrine forested wetland (PFO) area was identified on the proposed relocation site. This wetland extends south to north through the center of the site and totals 1.55 acres in size. Approximately 0.37 acre of this wetland would be directly impacted by the Proposed Action. The northern portion of this wetland may be indirectly impacted due to loss of hydrology.</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: A public notice will be published by the applicant 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 Proposed Action includes 0.37 acre of wetland impact. The Proposed Action is not located within the 100-year or 500-year floodplain.</p> <p>Other than the No Action and Demolition Only Alternatives, there are no practicable alternatives that would not involve impacts to the 100-year floodplain or greater wetland impacts. The majority of the City of Biloxi is located within the 100-year floodplain.</p> <p>The following alternative was considered and dismissed:</p> <p>Relocation of the Center to a 5.4-acre site located at 15195 Barbara Drive in Biloxi. Relocation of the Center to this site would involve clearing approximately 4 acres of wooded vegetation, including more than 2 acres of wetlands. The relocation of the Center to this site was dismissed from further consideration due to the potential for extensive wetland impacts.</p> <p>The following alternatives were evaluated in the EA:</p> <p><i>Alternative 1: No Action – The existing Center</i></p>

	<p>building would be mothballed to control the long-term deterioration of the structure.</p> <p><i>Alternative 2: Demolition Only</i> – The existing Center on Beach Boulevard would be demolished and the site would be returned to grade and revegetated in accordance with FEMA’s policy for FEMA-1604-DR-MS.</p> <p><i>Alternative 3: Relocation of the Santa Maria de la Mer Senior Living Center</i> to the 10-acre Medical Park Drive site, and the adjacent 0.85-acre access parcel (Proposed Action). This alternative includes:</p> <ul style="list-style-type: none"> • The new facility would connect to existing municipal water, electric and sewer utility tie-ins at the site. • The new facility would be a 163,892-square-foot building composed of two six-story residential towers with a one-story common area and parking lots. • A 53,000-cubic-foot stormwater detention basin would be constructed in the northeastern corner of the proposed relocation site.
<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: The Proposed Action would result in permanent impacts to wetlands. Impervious coverage would increase. Development of the site may also cause indirect permanent impacts to other portions of the wetland system, due to changes that would occur to the wetland’s hydrology pathway. This project will require consultation with the USACE, MDEQ, and MDMR.</p> <p>On October 14, 2009, a draft wetland report was sent to the USACE Mobile District and MDMR, Bureau of Wetlands Permitting, along with a request for a jurisdictional determination and pre-permit consultation. Coordination with both agencies is ongoing.</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: The Proposed Action will directly impact 0.37 acre of wetlands. After the permit review and approval process is completed, the CWA 404/401 permits will state what special conditions must be met as part of the permit requirement. These conditions would include using appropriate BMPs at the proposed construction and demolition sites to minimize soil erosion and reduce on-site and off-site sediment transportation to adjacent surface waters and</p>

	<p>wetland areas. Compensatory wetland mitigation may also be required.</p> <p>The Proposed Action includes implementation of Best Management Practices (BMPs) such as installing silt fences and stabilizing soils during construction, which will minimize runoff into wetlands and downstream water resources. Any disturbed vegetation would be replaced. A stormwater detention basin would be constructed on the site.</p> <p>The Proposed Action is not located within the 100-year or 500-year floodplain. The former Center, damaged by Hurricane Katrina in 2005 was located within a special flood hazard area. The southern portion of this former Center site is located in the 100-year coastal high hazard area, and the northern portion of the site is located in the 100-year floodplain. The existing damaged building will be demolished and the site returned to grade and revegetated, decreasing impervious cover and restoring the natural and beneficial value of the floodplain in this location.</p> <p>The Applicant must follow all applicable local, State, and Federal laws, regulations and requirements and obtain and comply with all required permits and approvals, prior to initiating work on this project. No staging of equipment or project activities shall begin until all permits are obtained. The Applicant must apply BMPs for soil erosion prevention and containment during staging of equipment and project activities. Should project activities be delayed for 1 year or more after the date of this EA, coordination and project review by the appropriate regulating agencies must be reinitiated.</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) its potential to disrupt floodplain and wetland values.</p>	<p>Project Analysis: The Proposed Action qualifies as a Critical Action (senior living complex), and remains practicable based on its location outside of the 100-year and 500-year floodplain. The wetland values of stormwater storage, groundwater recharge and water filtration of the wetland area to be directly impacted (0.37 acre) will be recovered by the implementation of the detention basin included in the Proposed Action plans, minimizing flood hazards and protecting water quality. Compensatory mitigation may also be required for the wetland impact.</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: A public notice will be published informing the public of FEMA’s decision to proceed with the project. This notice will include rationale for wetland 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 Federal wetland protection standards; and a statement indicating 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>