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**APPENDIX B**

**Eight Step Process for Critical Actions**

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**EIGHT STEP PROCESS AND ANALYSIS FOR CRITICAL ACTIONS**

<p><b>Step 1:</b> Determine whether the Proposed Action is located in a wetland, 100 year floodplain, and/or 500 year floodplain, or whether it has the potential to affect or be affected by a floodplain or wetland.</p>	<p><b>Project Analysis:</b> The FIRM maps for the proposed project site indicate that the site is located within a 100-year flood zone and a 500 year flood zone. According to the National Wetland Inventory Maps and a site visit by FEMA and MMI biologists on January 5, 2010, there are no wetlands on or immediately adjacent to the proposed project site.</p>
<p><b>Step 2:</b> Notify public at earliest 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><b>Project Analysis:</b> In June 2009, a planning and zoning public hearing was held to discuss the new fire station. The hearing was closed and a permit was granted on June 10, 2009.</p> <p>In addition to the above hearing, a notice will be published by the Applicant in a newspaper of general circulation when the Draft EA is made available for public review.</p>
<p><b>Step 3:</b> Identify and evaluate practicable alternatives to locating the Proposed Action in a floodplain or wetland.</p>	<p><b>Project Analysis:</b> The Proposed Action includes no wetland impacts. The proposed Action is located within the 100-year and 500 year flood zones.</p> <p>Other than the No Action Alternative, there is only one alternative for constructing the fire station within the flood zone.</p> <p>The following alternatives were evaluated in the EA:</p> <p><i>Alternative 1:</i> No Action</p> <p><i>Alternative 2:</i> Construction of new fire station (Proposed Action)</p> <ul style="list-style-type: none"> <li>• A 16,000 square foot LEED certified fire station, consisting of space for two fire companies, fire personnel offices and living quarters, a apparatus maintenance facility, and associated parking lot.</li> <li>• The fire station will have a slab on grade foundation and a finished floor elevation (FFE) of 37.2 feet NAVD 88. This FFE is approximately 5.7 feet and 2.7 feet above the FEMA published 100-year and 500-year flood zones, respectively.</li> <li>• The grading for the fire station includes compensatory storage for the fill within the 100 year flood zone. In fact the project results in a net cut of approximately seven cubic yards within the 100-year flood zone over existing conditions. The creation of the shallow depression will</li> </ul>

	<p>maintain the 100-year flood zone's existing capacity and conveyance, thereby eliminating any long-term impacts to this flood zone.</p> <ul style="list-style-type: none"> <li>• A portion of the 500-year floodplain will be filled (approximately 45 cubic yards) for construction of the fire station. Compensatory storage is not typically required within a 500-year flood zone and, as such, none is proposed.</li> <li>• Fire station will be constructed primarily out of pre and post consumer recycled materials. Low-flow plumbing fixtures and waterless urinals will be used throughout the facility. Some of the stormwater and on-site drainage will be managed and recycled for reuse to wash the vehicles. Rain Gardens are implemented to capture on-site drainage and recharge the aquifers, along with landscaping that will not require irrigation.</li> </ul>
<p><b>Step 4:</b> 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><b>Project Analysis:</b> The project would result in permanent impacts to the 100-year and 500-year floodplain. Impervious coverage is increasing within the floodplain. The project does not propose any fill within the 100-year floodplain.</p>
<p><b>Step 5:</b> Minimize the potential adverse impacts from the work within floodplains and wetlands (identified under Step 4), restore and preserve the natural and beneficial values served by wetlands.</p>	<p><b>Project Analysis:</b> There are no impacts to wetlands, so no replacement or mitigation would be required. The project is located within a 100 year and 500 year flood zone. The project does not propose any fill within the 100 year flood zone.</p> <p>Stormwater on site is being detained within a detention basin, rain garden, and infiltration galleries.</p> <p>The FFE of the building is proposed at 37.2 feet NAVD 88. This FFE is approximately 5.7 feet and 2.7 feet above the FEMA published 100-year and 500-year flood zones, respectively.</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 BMP's for soil erosion prevention and containment during staging of equipment and project activities. Should project</p>

	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.
<b>Step 6:</b> 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.	<b>Project Analysis:</b> The Proposed Action remains practicable based on the building standards, the fact that there are no impacts to wetlands, and that potential impacts to floodplains have been mitigated.
<b>Step 7:</b> 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.	<b>Project Analysis:</b> A public notice will be submitted informing 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 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.
<b>Step 8:</b> 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.	<b>Project Analysis:</b> This step is integrated into the NEPA process and FEMA project management and oversight functions.