



**FEMA**

## **FINDING OF NO SIGNIFICANT IMPACT**

Vernonia K-12 School Project  
Columbia County, Oregon  
FEMA-FMA-PJ-10-2009-0005

Columbia County (County) applied to the U.S. Department of Homeland Security's Federal Emergency Management Agency (FEMA) Fiscal Year 2009 Flood Mitigation Assistance Grant Program (FMA) for funding assistance to acquire and demolish the Vernonia K-12 School on behalf of the Vernonia School District (District). The District will use a portion of the grant proceeds to partially pay for building a new school campus nearby. The purpose of the FMA, created as part of the National Flood Insurance Reform Act of 1994 (42 USC 4101), is to provide assistance to communities to reduce or eliminate the long-term risk of flood damage to insured properties.

The K-12 School, located between 199 and 299 Bridge Street in Vernonia, is situated in the 100-year floodplain of the Nehalem River and Rock Creek and has incurred repetitive flood damage. The Proposed Action includes acquisition and demolition of the school buildings: the Washington Grade School, Vernonia Middle School, Vernonia High School gymnasium and cafeteria, the District administrative office, and a maintenance shed. Temporary modular buildings being used for classroom space will also be removed along with impervious surfaces such as parking lots. Some of the existing improvements on the school campus will remain to facilitate a future park use - new Spencer Park. These remaining improvements include a covered basketball court, a play area, a softball field, grandstands, and a concession/restroom facility (which will be flood proofed). These remaining improvements are consistent with open space floodplain uses and the National Flood Insurance Program (NFIP) as implemented by the City of Vernonia. The new Spencer Park will also have new amenities/improvements that are not funded through the FMA grant. The property will be deed restricted for open space uses in perpetuity.

The County will use some of the FMA grant proceeds to help fund construction of a new school campus (Boot Site) above the 500-year floodplain along Missouri Avenue in Vernonia. The Boot Site is about 23 acres and the new campus will include: a 135,000 square foot school building, an 18,000 square foot outbuilding (for District offices, art/science classrooms, and a woodshop), bus lanes, sidewalks/walkways, parking, stormwater management features, softball and baseball fields, and a football/track field. The school campus will be designed to at least meet Leadership in Energy and Environmental Design Silver standards. Much of the Boot Site includes fields and woods, but a 5 acre portion is park space (old Spencer Park) that was funded by the US National Park Service's (NPS) Land and Water Conservation Fund (LWCF). To remove federal protection from this parcel, the District and City of Vernonia will be

collaborating on a conversion process to relocate the park function to the current school campus (new Spencer Park) with park improvements described above. Only a small 'tot lot' from the park use will remain at the Boot Site. Development of the Boot Site will result an unavoidable loss of 3.8 acres of degraded jurisdictional wetlands, thus a 5.5 acres compensatory wetland is being developed off-site as mitigation. The compensatory wetland mitigation site is located just east of Vernonia Lake in the floodplain of the Nehalem River. Use of the Boot Site will also require improvements to the existing small residential roadways. Along Bridge Street these will include a new curb and sidewalk, expanded shoulder and bike lane, new handicap ramps, a new turn lane and cross walks for Missouri Avenue, and relocation of utilities. Improvements along Missouri Avenue will include new curb, gutter, planter strip, and sidewalk; handicap ramps; stormwater conveyance culverts; paving; and relocation of utilities. The Environmental Assessment (EA) includes a detailed description of the scope of work.

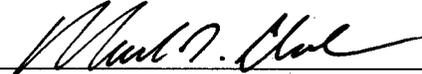
In the aftermath of the 2007 flood (FEMA 1733 DR OR), the District completed a needs assessment and alternatives review to evaluate feasible options for remaining at the current location or relocating. The District determined that relocating the school campus best met its longterm needs because the existing campus would remain at risk to future flood hazards and the Grade School, in particular, is at risk to seismic events. The Boot Site was selected because of its proximity to the existing school location and downtown Vernonia; and relative ease to develop in terms of land-use zoning changes and adjacent use compatibility, available infrastructure, and land acquisition.

Because the Proposed Action triggered the jurisdiction of two other federal agencies, FEMA invited the US Army Corps of Engineers and NPS to collaborate throughout the environmental review process per the President's Council on Environmental Quality guidelines. FEMA assumed a lead agency role for the National Environmental Policy Act of 1969 (NEPA). Per NEPA and FEMA's implementation regulations at 44 CFR Part 10, FEMA completed an EA (incorporated by reference) to identify and evaluate potential environmental impacts resulting from the alternatives presented. Although the FMA funding is limited to acquisition and demolition of the Vernonia K-12 school; the EA evaluated the connected actions of developing a new school with roadway improvements, a compensatory wetland mitigation site, and conversion of the school campus to park use. In addition to the above described Proposed Action Alternative, the No Action Alternative, and Northwest Corner Site Alternative were evaluated. Public involvement, for both EA scoping and review of the draft EA, included a 30-day comment period, direct mailing, and public meeting and was completed in July and October 2010, respectively. Most comments received were supportive of the Proposed Action, or related to funding, procedural or timing questions. There were some minor concerns over public safety related to roadway crossings and the EA was amended to address those concerns.

**FINDINGS**

Based upon the FMA grant application, EA, and Attachment A; and in accordance with FEMA's regulations in 44 Code of Federal Regulations (CFR) Part 10 for environmental consideration, including Executive Orders (EO) addressing floodplains (EO 11988), wetlands (EO 11990), and environmental justice (EO 12898), FEMA determined the proposed project will not significantly affect the quality of the natural and human environment. As a result of this FONSI, an EIS will not be prepared (44 CFR Part 10.8) and the project as described in the FMA grant application and EA may proceed.

**APPROVAL**

  
\_\_\_\_\_  
Mark G. Eberlein  
Regional Environmental Officer  
FEMA Region X

11-8-10  
\_\_\_\_\_  
Date

**Attachment A:**

**CONDITIONS, MITIGATION AND CONSERVATION MEASURES, AND BEST MANAGEMENT PRACTICES**

Mitigation and conservation measures refer to actions that would minimize, reduce, or eliminate potential adverse environmental impacts that could result from the Proposed Action:

- The proposed project will abide by all applicable local, state, and federal regulation and land use approvals.
- Conservation measures to minimize effects to water quality and biological resources provided by the National Marine Fisheries Service, by the Water Quality Certification prepared by Oregon Department of Environmental Quality, and all USACE permitting requirements will be adhered to during site development.
- Construction best management practices, as identified in the Sediment and Erosion Control Plan prepared for the proposed action, will be utilized and maintained throughout construction to control soil erosion and sediment, reduce spills and pollution, and provide habitat protection.
- Erosion controls will be in place prior to any ground disturbing activity.
- Avoided wetlands and waters will be fenced during construction as no-work zones.
- Clearing activities (grubbing and tree removal) will be done between April 15 and February 15 to avoid nesting activity impacts to migratory birds.
- Work within the unnamed tributary for the Boot Site will be conducted within the approved Oregon Department of Fish and Wildlife in-water-work window between July 1 and August 31 and the approved extension between November 15 and December 15.
- As follow-up to Phase II recommendations at the Boot Site, Texas Avenue property; additional assessment along with preparation and implementation of a contaminated media management plan is required to address petroleum-contaminated soils present.
- As follow-up to Phase II recommendations at the Boot Site, Spencer Park; soils in the vicinity of the three samples with elevated lead concentrations must be left in place to minimize the chance of spreading elevated lead in soil, and the areas must be covered with top soil or pavement to eliminate the direct contact pathway with birds and plants.
- Conservation and minimization measures outlined in the Biological Assessment shall be implemented. These measures recommend strict adherence to project construction specifications for site clearing, earth moving, asphalt paving, concrete paving, storm utility drainage piping, and subdrainage. Refer to Appendix D of the Biological Assessment for complete text of each specification (Appendix H).
- In the event that previously unidentified archaeological or historic materials are discovered during project activities, work in the immediate vicinity shall be discontinued, the area secured, and the SHPO, affected tribe, OEM, and FEMA notified.

## **Finding of No Significant Impact**

Vernonia K-12 School Project

Page 5

- Any hazardous materials discovered, generated, or used during construction would be disposed of and handled in accordance with applicable local, State, and Federal regulations, with the DEQ being the lead agency regarding compliance. During all activities, appropriate measures to remove, prevent, contain, minimize, and control spills of any potentially hazardous materials (e.g., petroleum products, pesticides, fertilizers, cement, solvents, paint) will be employed.
- The new school will be designed and constructed in accordance with appropriate seismic design and construction standards and practices.
- The Compensatory Mitigation Project will be constructed concurrent with the new school and in accordance with the USACE approved Compensatory Wetland Mitigation Plan.
- District is responsible for determining the presence of hazardous materials during demolition work at the existing schools. These materials shall be handled, managed, abated, and disposed of in accordance to the requirements of the applicable local, state, and federal agencies, including the DEQ.
- Prior to demolition of Washington Grade School a Pre-Demolition Asbestos Survey will be completed and all asbestos identified will be abated prior to any demolition activities which could disturb those materials. Asbestos abatement will be in compliance with the DEQ guidance and regulations.
- Oil tanks decommissioning at the existing school must be certified by an Oregon DEQ-licensed heating oil tank decommissioning service provider.
- All construction debris shall be disposed at an approved and permitted location. The site stormwater management system shall be operated and maintained consistent with its intended design.
- New Spencer Park will be constructed within 36 months of conversion.
- Work in the floodplain shall be conducted during the non-flood season as determined by the local floodplain administrator.
- Final design of new park facilities must be consistent with the standards and criteria of the National Flood Insurance Program and the Vernonia floodplain ordinance. The new park facilities must minimize potential flood harm to the federal investment and to floodplain values through minimizing impervious surfaces and wet or dry floodproofing or elevation of facilities. Elevation with fill is to be avoided.
- No construction shall be performed within 300 meters of an occupied dwelling unit on Sundays, legal holidays and between the hours of 10:00 p.m. and 7:00 a.m. on other days.
- Implementation and compliance with the adverse affect treatment measures outlined in the Memorandum Of Agreement executed in November 2010 for the Grade School.
- Project implementation will comply with FONSI's issued by USACE and NPS.