



Final Environmental Assessment

## **RELOCATION OF THE SHOULDER**

The Shoulder of the Central Gulf Coast, Inc.

Daphne, Alabama

FEMA-1605-DR-AL PW#'s 1597, 1598, 1604

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**FEMA**

**U.S. Department of Homeland Security**  
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## ACRONYMS AND ABBREVIATIONS

ADEP	-	Alabama Department of Environmental Protection
APE	-	Area of Potential Effect
AEMA	-	Alabama Emergency Management Agency
BMPs	-	Best Management Practices
CBRA	-	Coastal Barrier Resources Act
CERCLA	-	Comprehensive Environmental Response, Compensation and Liability Act
CFR	-	Code of Federal Regulations
CZMA	-	Coastal Zone Management Act
CZMP	-	Coastal Zone Management Plan
EA	-	Environmental Assessment
EIS	-	Environmental Impact Statement
EO	-	Executive Order
ESA	-	Endangered Species Act
FEMA	-	Federal Emergency Management Agency
FIRM	-	Flood Insurance Rate Map
FONSI	-	Finding of No Significant Impact
NEPA	-	National Environmental Policy Act
NHPA	-	National Historic Preservation Act
NMFS	-	National Marine Fisheries Service
NRHP	-	National Register of Historic Places
NWI	-	National Wetland Inventory
PA	-	Public Assistance
PW	-	Project Worksheet
SHPO	-	State Historic Preservation Office
SOW	-	Scope of Work
THPO	-	Tribal Historic Preservation Officer
USACE	-	U.S. Army Corps of Engineers
USFWS	-	U.S. Fish and Wildlife Service

## SECTION 1 – EXECUTIVE SUMMARY

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The Shoulder of the Central Gulf Coast, Inc. (The Shoulder) is a private non-profit (PNP) providing treatment for those afflicted with drug and alcohol addictions. Its facility, located in Spanish Fort, Baldwin County, Alabama was destroyed by Hurricane Katrina. The Shoulder applied for Federal financial assistance under the Federal Emergency Management Agency's (FEMA) Public Assistance (PA) Program. The State of Alabama is the Grantee and responsible for administering the funds. Applicants, such as The Shoulder, submit a sub-grant application (Project Worksheet (PW) #'s: 1597, 1598, 1604). FEMA would provide for 75% of the actual cost provided the applicant follows the Scope of Work (SOW) included in the PW. The funding will be administered through The Alabama Emergency Management Agency (AEMA) as the grantee. The Shoulder would be eligible for the actual cost provided the work was completed as presented in the SOW of the PW. However, The Shoulder is proposing to relocate the facility rather than rebuild at the original location. Relocation would result in the project being classified as an "Improved Project" under FEMA's PA Program provided it maintains the same function and use. As an Improved Project, the Federal Share will be capped at eligible funds approved in the PWs.

The Shoulder is currently operating out of a leased space located 4700 Roper Lane in Daphne, Alabama (Figure 2, Figure 3). Daphne is located between Mobile, Alabama and Pensacola, Florida. The Shoulder currently occupies approximately 30,000 square feet, and has a capacity for approximately 20 residential clients in each program, for a total of 40 beds. However, the landlord for the temporary facility is planning on proceeding with its own renovation and expansion project. With the work nearing a start date, the nonprofit's only option to remain operational is to accept the landlord's offer to remain on site in only 7,000 square feet of space, or roughly one-quarter of its current space. The Shoulder has applied to FEMA through AEMA for funding to relocate this facility. AEMA proposes to provide funding for a 22,500 square foot facility for "The Shoulder of Central Gulf Coast" located in Daphne, Alabama adjacent to the location currently leased (Figures 1, 2, and 3).

This Draft Environmental Assessment (EA) has been prepared in accordance with the National Environmental Policy Act of 1969 (NEPA) and FEMA's regulations to implement NEPA (44 CFR Part 10). FEMA is required during decision making to fully evaluate and consider the environmental consequences of major federal actions it funds or undertakes. FEMA will use the findings in this EA to determine whether to prepare an Environmental Impact Statement (EIS) or a Finding of No Significant Impact (FONSI).

## SECTION 2 – PURPOSE AND NEED

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### 2.1 Background Information

Hurricane Katrina made first landfall at approximately 1830 EDT on August 25, 2005 as a Category 1 hurricane near the Broward/Miami-Dade county line in Florida. After moving across the Gulf of Mexico, Katrina gained strength and made landfall as a Category 3 hurricane on August 29 along the Gulf Coast of Louisiana, Mississippi and Alabama.

The Shoulder of the Central Gulf Coast, Inc., a private non-profit organization referred to as "The Shoulder", operated a long-term residential and outpatient treatment center. This facility was located along Old Spanish Fort Parkway on an island in the eastern portion of Mobile Bay (Figure 1). It was located in the City of Spanish Fort in Baldwin County. The facility was formerly a motel built in 1955. The Shoulder's Mission and Purpose is to provide long-term residential (48 patient) and outpatient treatment for those afflicted with alcohol and/or chemical addictions. It is certified through the Alabama Department of Mental Health (Appendix D).

The facility was located in a coastal high hazard area and as a result of an 8 to 10 foot tidal surge all the buildings on the site were damaged beyond repair. Buildings destroyed included the administration building and two residential structures (north wing and east wing) with a total square footage of 41,353 square feet. The facility provided a total of 48 living units. The buildings housed offices, telephone room, copy/mail room, supply closets, bathrooms, dining room, kitchen, freezer room, lounge and chapel. The facility included a small garage building as well as a wastewater pumping facility both of which were damaged beyond repair. Building contents were also lost as well as vehicles owned by the facility.

The purpose of this EA is to analyze the potential environmental impacts of the proposed project and alternatives, including no action, and to determine whether to prepare an Environmental Impact Statement (EIS) or Finding of No Significant Impact (FONSI).

### 2.2 Project Purpose

The project purpose and need is to relocate The Shoulder facility to an area that is not as susceptible to storm damage as it received from Hurricane Katrina. Hurricane Katrina severely damaged the facility, and it had to be demolished. It is proposed to locate the facility in the City of Daphne, in Baldwin County, and within the area currently serviced by the facility.

### 2.3 Need for the Project

The Shoulder would like to build a new facility inland, to reduce future facility damages and to reduce disruptions of the public services they provide for those afflicted with alcohol and/or drug

additions. The Shoulder's Mission and Purpose is to provide long-term residential and outpatient treatment for those afflicted with alcohol and/or chemical addictions. The Shoulder is certified to provide these services under the Alabama Department of Mental Health.

The Shoulder is the only drug and alcohol treatment facility in Daphne (Treatment Centers, 2010). A search of records of the Substance Abuse and Mental Health Services Administration of the U.S. Department of Health and Human Services indicated only one other facility providing similar services are within a 10 mile radius and located approximately 7.5 miles to the south (SAMHSA, 2010). This facility however only provides outpatient services. There are 8 other treatment facilities located within a 20 mile radius. These facilities are all located on the west side of Mobile Bay. Finally, unlike all the other facilities in the area, The Shoulder is the only one that provides residential long-term treatment of more than 30 days. The only other facility in the area for residential treatment is limited to less than 30 days. All the other facilities in the area provide outpatient services only.

## **2.4 Project Location**

The proposed project site is located in the City of Daphne, in southwestern Baldwin County, in southern Alabama (Figure 4, Figure 5). The county is bordered by the Gulf of Mexico to the south, and Mobile Bay to the southwest. The city is along Mobile Bay's northern edge. Daphne occupies the coastal area on the west side of Baldwin County and is bounded to the north by the City of Spanish Fort (former location of The Shoulder). It is also bounded by 3 small unincorporated communities including Malbis to the north-east, Belforest to the east and Montrose to the south.

The proposed relocated facility in Daphne would be about 3.5 miles southeast of the previous site (Figure 1), about 1.5 miles east of Mobile bay, and next to Daphne's residential and industrial areas. The new facility would be built on previously undeveloped land next to an existing facility that The Shoulder has been temporarily using to continue providing public services.

## SECTION 3 – ALTERNATIVES CONSIDERED

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According to NEPA, FEMA is required to provide alternatives to the proposed project. As the proposed project is to relocate the facility, one alternative would be to replace the facility at the current location. For this alternative, no new land will be needed to construct the facility. As required, a no action alternative was also considered as part of this EA. Details are presented below.

### 3.1 Alternatives Considered and Dismissed

The following alternatives were considered but were dismissed because of environmental concerns or because they did not adequately address the mission and goals of The Shoulder in terms of economic viability or long term potential for development of services.

#### 3.1.1 Rebuild at Original Location

The Shoulder could rebuild the facility in its original location. The facility would then be vulnerable to future storm damage. The facility was located in a Coastal High Hazard Area (Zone VE) based on FEMA Insurance Rate Maps (Panel #: 01003C0516L, Baldwin County Unincorporated and Incorporated – Effective- July, 17, 2007). [Note: The facility was not located in a Coastal Barrier Resource Area (CBRA)]

If The Shoulder were to replace the building, the facility would need to be rebuilt to Coastal High Hazard Area codes and standards. Improvements, such as elevation, would have to be made to meet the requirements of the National Flood Insurance Program (NFIP). This may include elevation on stilts. Soils at this location are rated as very limited for small commercial building construction. The soils may not be able to support such construction loads or to provide proper protection from storm surges and flooding as required by NFIP codes.

Also, given the services offered by The Shoulder, the facility could be considered a critical facility. Critical Facilities include, “Hospitals, nursing homes and housing likely to have occupants who may not be sufficiently mobile to avoid injury of death during a flood” (IS-9 Managing Floodplain Development Through The National Flood Insurance Program). Based on Executive Order (EO) 11988, critical facilities should be located outside the 500 year floodplain unless otherwise impractical. Since relocation of the facility out of the Coastal High Hazard and 500 year floodplain is practicable, the facility could not be replaced in the same location as provided in 44 CFR 9.4.

The site does not have wetlands directly on the land that would be used. However, the immediate surrounding area is classified as Estuarine and Marine wetlands. If the Alternate is chosen, then consultation with the U.S. Army Corps of Engineers (USACE) and the Alabama Department of Environmental Protection (ADEP) will be required for possible permits.

Based on the above factors, rebuilding at the existing (original) location is dismissed from further evaluation.

### 3.1.2 Lease a facility at a New Location

The Shoulder is currently leasing a space at 4700 Roper Lane, Daphne, Alabama. The Shoulder currently occupies approximately 30,000 square feet, and has a capacity for approximately 20 residential clients in each program (drug and alcohol addiction), for a total of 40 beds. This is a temporary relocation. The landlord is currently planning remodeling and the area occupied by The Shoulder will be reduced to 7,000 square feet or less than one-quarter of the space currently occupied. Regardless, continuing to lease at this facility or at another location would not meet the mission and goals of The Shoulder to provide a permanent facility for operations. Based on these factors, leasing space at a new location (including currently leased space) is dismissed from further evaluation.

## 3.2 Alternatives Analyzed

The following alternatives were analyzed for their potential environmental consequences.

### 3.2.1 Preferred Alternative

The preferred alternative is to construct a new facility on 6.36 acres inland of Mobile Bay in the City of Daphne (Figure 3, Figure 4). The site is located approximately 3.5 miles south-east of the original facility and on vacant land directly south of the current facility on Roper Lane (Figure 6). Plans include 22,500 square foot facility (footprint of building area and storage building equals 22,899 square feet). Architectural plans for the facility were prepared by Kings Custom Builders, Inc. (Figure 7). The new building will have facilities to conduct normal operations including, bedrooms, kitchen, meeting rooms, offices, and a chapel. The Shoulder is certified through the Alabama Department of Mental Health which has established building standards (Life Safety Minimum Standards for Physical Facilities – Chapter 580-3-22).

Site plans covering the 6.36 acres including layout of the main building, storage building, drainage system, storm drainage pond and parking lot for the facility were prepared in October of 2009 by Speaks & Associates Consulting Engineers, Inc. (Figure 6). A breakdown of the land area for the preferred alternative is presented below.

#### Breakdown of Land Area (Preferred Alternative)

Lot Area =	277,086 SF	6.36 Acres	% of Lot Area
Building Area =	22,899 SF	0.53 Acres	8.3%
Impervious Area (Sidewalks) =	4,534 SF	0.10 Acres	1.6%
Impervious Area (Parking/Paving) =	59,680 SF	1.37 Acres	21.5%
<b>Total Impervious Area</b>	<b>87,113 SF</b>	<b>2.00 Acres</b>	<b>31.4%</b>
Pervious Surfaces (Landscape/Common Area)	166,833 SF	3.83 Acres	60.2%
Previous Surfaces (Detention Area)	23,140 SF	0.53 Acres	8.4%
<b>Total Pervious Area</b>	<b>189,973 SF</b>	<b>4.36 Acres</b>	<b>68.6%</b>

Source: Preliminary Site Plans, October, 2009. Speaks & Associates, Consulting Engineers, Inc.

Site development plans include a water and sewer connection to the existing City of Daphne water and sewer systems. The drainage system includes the construction of a stormwater detention pond to receive stormwater flow from the paved and impervious surfaces including building area, sidewalks, and parking area. Such detention ponds are designed on the basis of a hydrological study to provide no increase in the peak discharge from the facility.

### **3.2.2 No Action Alternative**

Inclusion of a No Action Alternative in the environmental analysis and documentation is required under NEPA. The alternative evaluates the effects of not providing eligible assistance for a specific action and provides a benchmark against which the other alternatives may be evaluated.

Under the No Action Alternative, FEMA would not provide funding for the relocation of The Shoulder. If no action was taken, it would leave The Shoulder with no facility to conduct day to day operations and house those participating in the programs it offers. Reconstruction at the site of the original facility is not economically or environmentally feasible. The facility was destroyed by Hurricane Katrina, and the remaining structure has been demolished. Further, reconstruction of a “Critical Facility” at this location may not be eligible for flood insurance under the National Flood Insurance Program. As described above, The Shoulder is the only drug and alcohol treatment facility providing long-term in-patient care within a 10 mile radius.

## SECTION 4 – AFFECTED ENVIRONMENT AND POTENTIAL IMPACTS

This section describes the affected environment and the potential impacts of alternatives considered.

### 4.1 Summary Table of Environmental Conditions and Consequences

The following table summarizes environmental resources and the impacts from the two alternatives. A complete discussion of those resources that have potential impacts follows the table.

<b>Summary Table of Environmental Conditions and Consequences</b>			
<b>Affected Environment</b>	<b>Text Location</b>	<b>Impacts of the No Action Alternative</b>	<b>Impacts of the Preferred Alternative</b>
Geology and Soils	4.3.1	None	Temporary, minor construction dust.
Protected Farmland	4.3.2	None	No protected farmland affected.
Air Quality	4.3.3	None	Temporary, minor construction exhaust.
Water Quality/Water Resources	4.4	None	Negligible runoff change. Drainage system includes stormwater detention facility. The Shoulder will follow Best Management Practices for controlling stormwater runoff and pollutants.
Floodplains	4.4.3	None	Site is not located within a designated flood zone.
Wetlands	4.4.4	None	No Federally designated wetlands affected as per EO 11990
Coastal Resources	4.4.5	None	No impacts on Coastal Resources (Consultation completed with Coastal Unit of the ADEP).
Fish & Wildlife; Protected Species & Habitat	4.5.1	None	No Federal rare, threatened or endangered species or critical habitat on the site.

			New location may have a presence of Gopher Tortoise, which is a State Endangered species. Site investigations did not identify the presence of gopher burrows.
Historic Resources	4.6.1	None	State Historic Preservation Officer finds no effect on any known cultural resources listed on or eligible for the National Register of Historic Places.
Archeological Resources	4.6.2	None	Low probability of archeological artifacts, very low probability of archeological site. Applicant will follow incidental find requirements if applicable.
Traditional Religions/Native American Resources	4.6.3	None	No significant impact on tribal resources is anticipated. The Shoulder will cease construction and notify State and interested tribal governments if artifacts or remains are discovered.
Planning and Zoning	4.7.1	None	Zoning approval obtained. Use of site granted by "Special Exception" under the local Land Use and Development Ordinance.
Environmental Justice	4.7.2	Regional loss in services for patients with alcohol and chemical addictions. With no facility, it would leave patients to travel farther away from home and work for their treatment.	Maintains regional capacity for treat of patients with alcohol and chemical addictions. Allows patients to stay close to the same area in which they work and live.
Hazardous Materials	4.7.7	None	The Facility will not produce or handle hazardous waste or materials. An

			Environmental Site Assessment indicates no hazardous materials on site. There are no identified Brownfield, Superfund or any facilities that are being cleaned up, or have been cleaned up under the RCRA (Resource Conservation and Recovery Act) Corrective Action Program that are located within the City of Daphne.
Cumulative and Secondary Impacts	4.8	None	No significant change in land use density, sewage generation, water use, or traffic flow.
Other(s)		None	Other environmental topics/ subtopics are not applicable for any project alternative, are briefly discussed in this EA, but excluded from this summary table. If any noteworthy changes are found during public review, then these will be evaluated further and appropriate action taken if needed.

The potential consequences of the alternatives considered are described below. Some categories of impacts are not considered as they may not be relevant to the proposed activities or present on the site or surrounding areas.

## **4.2 Project Setting**

The physical setting of the site and existing projects affecting the Preferred and No Action Alternatives are described below.

### **4.2.1 Physical Setting**

The site is located east of Roper Lane in the City of Daphne, Alabama (Figures 2-4). The property is approximately 160 feet above sea level (Figure 5). The proposed project work is located approximately 10 miles East, Southeast of the downtown area of Mobile, Alabama. It is located within the Tiawasee Creek sub-watershed, which comes together with D'Olive Creek and Joe's Branch form the D'Olive Bay watershed.

### **4.2.2 Existing Projects**

The landlord of the adjacent facility is planning renovation. These renovations would leave The Shoulder with only 7,000 Square Feet until renovations are completed. The Shoulder has obtained architectural and engineering services for the development of a new facility. Site plans and architectural plans have been prepared and are described below. The Shoulder has also obtained approval from the local Planning Department and preliminary approval for construction.

## **4.3 – Physical Resources**

### **4.3.1 Geology & Soils**

Preferred Alternative: A review of the “Web Soil Survey” on the NRCS website indicates the proposed site is comprised largely (over 90%) of the Orangeburg fine sandy loam. The loam is well-drained with a low available water capacity. In these soils, the depth to water table is reportedly greater than 6 feet. The area has a rating of no limitations for small commercial building construction. The ratings are based on the soil properties that affect the capacity of the soil to support a load without movement and on the properties that affect excavation and construction costs. (NRCS, 2010)

No Action: The no action alternative would not have any effect on soils as no construction would take place.

### **4.3.2 Protected Farmland**

The Farmland Protection Policy Act (FPPA) requires Federal agencies to evaluate the effects (direct and indirect) of their activities before taking any action that could result in converting designated prime or unique farmland or farmland of statewide and local importance to nonagricultural purposes.

Preferred Alternative: The preferred alternative site is entirely within the City of Daphne boundaries. There are no designated agricultural lands within the City and soils are not prime, unique, or important as defined by the FPPA. The action complies with the FPPA and no further documentation is required.

No Action Alternative: The no action alternative is not located on or in the immediate vicinity of prime, unique or important farmland.

### **4.3.3 Air Quality**

Based on review of the U.S. Environmental Protection Agency's list of current designated Non-Attainment Areas, Baldwin County is in an Attainment Area. There are no regulated EPA air emissions within a 1 mile radius of the site (Enviromapper, U.S. EPA Envirofacts Warehouse, 2010). Consultation was sought through the Alabama Department of Natural Resources Air Division and no permits are required and there are no issues of concern with the site proposed for the preferred alternative (Appendix C-2).

Preferred Alternative: The preferred alternative would not create permanent emissions other than from general vehicular use. The preferred alternative would create temporary emissions from vehicle exhaust during construction, and temporary power generator emissions during testing and, when needed, during emergencies and disasters.

No Action Alternative: The no action alternative would not change air quality because no construction would occur.

## **4.4 Water Quality/Water Resources**

The proposed site is located within the Tiawasee Creek sub-watershed, which comes together with D'Olive Creek and Joe's Branch form the D'Olive Bay watershed. The Tiawasse Creek watershed is the location of the Lake Forest subdivision, reputed to be the largest subdivision in the State. According to a recent report, when this area was developed, there were no requirements for Best Management Practices (BMPs) such as siltation fencing during construction or for post-construction stormwater runoff management (Barry A. Vitter & Associates Inc., 2010). Much of the development in this area of Baldwin County took place on steep slopes. The mature hardwood trees that occupy the riparian areas of the watershed, however, were never cleared and most are relatively healthy.

### **4.4.1 Surface Water Quality**

The State of Alabama established a statewide program for stormwater management pursuant to the requirements of the National Pollutant Discharge Elimination System (NPDES). Code of Alabama 1975, §§ 22-22-1 to 22-22-14 and §§ 22-22A-1 to 22-22A-16 et seq., as amended. Alabama's DEM program establishes permitting requirements for construction sites disturbing more than one acre, industrial sites, and Municipal Separate Storm Sewer Systems (MS4s). Additional permit requirements exist in the coastal regions of Baldwin and Mobile County.

"NPDES Construction Site" means construction activities that are required to obtain NPDES permit coverage under this Chapter. An NPDES Construction Site is construction that disturbs 1 acre or greater or will disturb less than 1 acre but is part of a larger common plan of development

or sale whose total land disturbing activities total 1 acre or greater. An NPDES construction site also includes construction sites, irrespective of size, whose stormwater discharges have a reasonable potential to be a significant contributor of pollutants to a water of the State, or whose stormwater discharges have a reasonable potential to cause or contribute to a violation of an applicable Alabama water quality standard. Consultation was sought with the ADEP regarding the need for a NPDES Permits as provide under their Water Quality Program (Chapter 335-6-12), (Appendix C-3).

Preferred Alternative: The preferred alternative storm water runoff is estimated to flow east and northeast towards Tiawasee Creek, located approximately 3,000 feet from the site. The stormwater management system, as included in the approved site development plans, includes a stormwater detention pond designed to prevent an increase in the peak discharge from the facility. Such detention basins also serve to remove particulates and other contaminants from stormwaters and serve to minimize downstream impacts.

As the site construction will cover over 1 acre, the preferred alternative will require an NPDES Construction Permit. Regardless, The Shoulder will employ BMPs meaning planning, project phasing, schedules of activities, implementation, operating, and maintenance procedures, management strategies, effective treatment practices, and to the extent necessary, post construction follow-up continuing maintenance, that meet or exceed recognized effective industry standard practices, that meet or exceed the technical standards and guidelines of the Alabama Handbook, and that meet or exceed the requirements of this Chapter 335-6-12, that are implemented to prevent/minimize pollutant discharges to the maximum extent practicable. BMPs also include effective practices to control pollutant discharges from land disturbance activities associated with pre-construction testing, site assessment, surveying, and other pre-construction development support activities. BMPs also include effective practices to control pollutant discharges from spillage or leakage, stormwater transport, storage, treatment, or disposal.

No Action Alternative: The no action alternative would not significantly affect surface water quality or runoff because no construction would occur.

#### **4.4.2 Groundwater**

There are no significant groundwater resources identified at the site. The property is comprised largely (over 90%) of the Orangeburg fine sandy loam (NRCS, 2010). The loam is well-drained soils with the water depths typically greater than 6 feet.

Preferred Alternative: The proposed facility will obtain water through a connection to the City's water supply and not through on-site wells.

Land development, by its very nature, results in an increase in surface water runoff and a reduction in groundwater recharge. However, the preferred alternative includes a stormwater detention basin in keeping with local site development requirements. This allows a portion of the runoff from the site to recharge the groundwater. Therefore, they also would not notably affect groundwater quantity or quality. The preferred alternative by design, would not significantly affect groundwater quality or groundwater recharge.

No Action Alternative: The no action alternative would not significantly affect groundwater quality or groundwater recharge because no construction would occur.

#### **4.4.3 Floodplains**

Executive Order (EO) 11988 requires federal agencies to take action to minimize occupancy and modification of the floodplain. Specifically, EO 11988 prohibits federal agencies from funding construction in the 100-year floodplain unless there are no practicable alternatives. FEMA's regulations for complying with EO 11988 are promulgated in 44 CFR Part 9 and include an 8-step decision making process.

Preferred Alternative: The preferred alternative site is in an area slightly upland from Mobile Bay, outside the 500-year floodplain (FEMA Flood Insurance Rate Panel #: 01003C0525L) unshaded Zone X. It is not located in a Floodplain (Figure 9). EO 11988 (Floodplain Management) regulates federal actions that will or may affect or be affected by floodplains. Since the preferred alternative site is outside the 500-year floodplain, the project complies with EO 11988 requirements. It would also comply with 44 CFR (U.S. Code of Federal Regulations) Part 9.11(3)(ii and iii) requirements to locate "critical facilities," outside of the 500-year floodplain when practicable.

No Action Alternative: The no action alternative would have no effect on floodplains or floodplain development as no construction would occur; however, the site would be available for residential development in the future.

#### **4.4.4 Wetlands**

EO 11990, Protection of Wetlands, requires federal agencies to take action to minimize the loss of wetlands. The NEPA compliance process also requires federal agencies to consider direct and indirect impacts to wetlands which may result from federally funded actions.

Preferred Alternative: The National Wetland Inventory (NWI) map indicate that the project location is located within an upland area. As shown on the NWI map for the project area (Figure 8) wetlands are not present on or within 500 feet of the proposed site. Therefore, the preferred alternative would neither affect nor be affected by any wetlands and would comply with EO 11990.

No Action: The no action alternative would have no effect on wetlands or wetlands characteristics as no construction would occur.

#### **4.4.5 Coastal Resources**

The Coastal Zone Management Act (CZMA) requires states with shorelines in coastal zones to have a Coastal Zone Management Plan (CZMP) to reduce uncontrolled coastal development. Projects falling within these coastal zones must be evaluated to ensure that they are consistent with the CZMP. Projects receiving Federal assistance must follow the procedures outlined in 15 CFR 930.90 – 930.101 for consistency determinations. Under these procedures, grant applicants must submit their proposals to the State agency in charge of the CZMP to obtain a consistency determination. FEMA cannot approve a grant without the State agency's consistency approval.

Alabama's coastal zone extends inland to the continuous 10-foot elevation contour in Baldwin and Mobile Counties. A certification decision is required when a private individual or business, or a state or local government, or any other type of non-federal entity applies to the federal government for a required permit or license or any other type of authorization subject to the requirements of CZMA section 307(c) (3)(A)(16U.S.C. section 1456 (c) (3)(A)) and 15 C.F.R. Part 930, Subparts A, B, and D if the activity is located in the coastal area of Alabama and the activity has reasonable foreseeable effects on the state's coastal resources. Typical activities are those requiring USACE 404 permits (e.g. wetlands fill); Sections 10 and 11 of the River and Harbor Act of 1899 (e.g. dredging, piers, docks, marinas, etc.).

Projects having the potential to impact Alabama's coastal resources are subject to review pursuant to the ADEP's Coastal Rules. Some of these projects include: Construction on Gulf-fronting properties, Commercial and Residential Development on Properties Greater than 5 Acres, Projects Impacting Wetlands and/or Water Bottoms, Discharges to Coastal Waters.

Consultation was sought through the Alabama Department of Natural Resources Coastal Unit and they have advised that the preferred alternative project is not located in the Alabama coastal zone and therefore does not require a coastal zone management decision (Appendix C-3).

The City of Daphne Land Use and Development Ordinance (Adopted by City Council September 3, 2002 as amended) also regulates development within coastal resource areas. This includes (land below 10 Feet above mean sea level high tide).

Preferred Alternative: Based in Consultation with the Alabama Department of Natural Resources Coastal Unit, the preferred alternative would not have any negative impacts on Alabama's coastal resources. Also, the proposed site or proposed facilities do not fall under coastal resources as regulated under the City Land Use and Planning Ordinance.

No Action: The no action alternative would not impact Alabama's coastal resources as no construction would occur.

## **4.5 Biological Resources**

The proposed site is located in a cleared area. There is developed land to the north and a narrow perimeter of trees along the west, east and southern boundary. This area is otherwise imbedded in a heavily developed area of Daphne.

### **4.5.1 Threatened and Endangered Species.**

Under Section 7 of the Endangered Species Act (ESA), any federal agency that funds, authorizes, or carries out an action must ensure that their action is not likely to jeopardize the continued existence of any endangered or threatened species, or result in the destruction or adverse modification of designated critical habitats. In accordance with Section 7 of the ESA of 1973, the project area was evaluated for the potential occurrences of federal and/or state protected species. The U.S. Fish and Wildlife Service (USFWS) and the Alabama Department of

Conservation and Natural Resources were consulted regarding the presence of threatened or endangered species or critical habitat.

Preferred Alternative: Based upon consultations with the USFWS in Daphne, Alabama (Appendix C-2) there are no federally threatened or endangered species or critical habitat in the project area. Based on the response to the consultation letter to the Department of Conservation and Natural Resources in Montgomery, Alabama (Appendix C-3) the project site may be occupied by gopher tortoises (See correspondence dated 2/26/2010). The gopher tortoise is a state protected species that prefers open habitats and frequently can be found in disturbed habitats such as roadsides, fence-rows, old fields, and edges of overgrown uplands. The site should be inspected for the presence of gopher tortoise burrows. If gopher tortoise burrows are found on the site, FEMA and the Alabama Wildlife and Freshwater Fisheries Division should be contacted immediately for further guidance. FEMA Environmental Staff conducted a follow up visit to the site on April 15, 2010. No evidence of gopher tortoise burrows was found on the site.

No Action: The no action alternative would have no effects on threatened and endangered species or critical habitats as no construction would occur.

#### **4.5.2 Ecosystems, Fish, and Wildlife.**

Preferred Alternative: The preferred alternative would be located largely on previously cleared land and undeveloped land. Minor additional clearing will be required for the facility. This is a very developed area of Daphne with impacts on vegetation and wildlife expected to be minimal. The City of Daphne Land Use and Development Ordinance (Adopted by City Council September 3, 2002 as amended) contains strict guidelines for landscape and tree protection. The Applicant has received site plan approval from the City of Daphne. Such site plans include a landscape and irrigation plan. Overstory tree species with a 12-inch or greater caliper (diameter measured 6-inches above the ground) or an understory tree species of with an 8-inch or greater caliper are considered protected and cannot be removed without the permission of the City of Daphne Horticulturalist.

No Action: The no action alternative would not have any effect on vegetation or wildlife. The original location was extensively developed. Reuse of the site would likely be limited due its location in a VE Flood Zone, and any development there may be required to be located on stilts and above the Base Flood Elevation.

## **4.6 Historic and Cultural Resources**

Consideration of impacts to historic properties and/or cultural resources is mandated under Section 106 of the National Historic Preservation Act (NHPA), as amended, and implemented by 36 CFR Part 800. These and other related statutes require federal agencies to take into account the potential consequences of their decisions, and to incorporate into their actions measures as appropriate and to the maximum extent possible or practicable to avoid, minimize, or mitigate any adverse impacts to historic resources. Requirements include identification of significant

historic properties or cultural resources that may be impacted by the preferred alternative or that fall within the project's Area of Potential Effect (APE).

A Historic Property is defined as “any district, building, structure, site, or object that is significant in American history, architecture, archeology, and culture” and that is listed in or eligible for listing in the National Register of Historic Places (NRHP) (36 CFR 60.4). As defined in 36 CFR Part 800.16(d), the APE “is the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if such properties exist.”

In addition to identifying historic properties that may exist in the proposed project’s APE, FEMA must also determine, in consultation with the State Historic Preservation Officer (SHPO) and (if applicable) Tribal Historic Preservation Officers (THPO), what effect, if any, the action would have on historic properties. Moreover, if the project would have an adverse effect on these properties, FEMA must consult with the appropriate agencies on ways to avoid, minimize, or mitigate the adverse effect.

#### **4.6.1 Historic Resources**

FEMA consulted with the State Historic Preservation Officer (SHPO) in the Alabama Historical Commission (Appendix C-4 - Correspondence dated 4/21/2010 and response dated 3/8/2010 and 5/5/2010).

Preferred Alternative: The SHPO determined that the project activities associated with the preferred alternative will have no effect on any known cultural resources listed on or eligible for the National Register of Historic Places.

No Action: The no action alternative would not have any effect on any structures listed or eligible for listing on the National Register of Historic Places. The previous facility was constructed in 1955, but was not eligible for the Register. The facility was also demolished.

#### **4.6.2 Archeological Resources**

Preferred Alternative: As required by the National Historic Preservation Act (NHPA), The Shoulder has agreed that if any archeological artifacts or human remains are found (incidental find or discovery) during project work, that all work would immediately stop within 100 feet of the find; that AEMA would contact FEMA and the AL SHPO within one working day; and that work would resume only after all applicable NHPA Section 106 legal requirements are met.

No Action: The no action alternative would not adversely affect any archeological resources as no construction would occur.

#### **4.6.3 Traditional Religions/Native American Resources**

FEMA has contacted representatives of the following Tribal Governments including Tribal Historic Preservation Officers or Policy Analysts (Appendix C-5):

- Alabama-Quassarte Tribal Town of the Creek Nation
- Poarch Band of Creek Indians

- Alabama-Coshatta Tribe of Texas
- United Keetoowah Band of Cherokee Indians in Oklahoma
- Seminole Nation of Oklahoma
- Choctaw Nation of Oklahoma
- Eastern Shawnee Tribe of Oklahoma
- Kialegee Tribal Town
- Muscogee (Creek) Indians
- Mississippi Band of Choctaw Indians
- Coushatta Tribe of Louisiana
- Absentee-Shawnee Tribe of Oklahoma
- Jena Band of Choctaw Indians
- Chickasaw Nation
- Eastern Band of Cherokee Indians
- Cherokee Nation

These were contacted to determine if any of the Tribes place cultural or religious significance to this property, has any specific comments or concerns related to the project, or would otherwise like to request status as a “consulting party” in the review of the subject project pursuant to Sections 101 and 106 of the National Historic Preservation Act, and 36 CFR Part 800. Copies of correspondence detailing coordination with Native American interests can be found in the Correspondence section of the Appendix.

None of the THPOs asked to participate as a “consulting party.” The Alabama-Coushatta Tribe did submit a response. The Alabama-Coushatta Tribe maintains ancestral associations throughout the state of Alabama despite the absence of written documentation to completely identify Tribal activities, villages, trails, or burial sites. However, it is their objective to ensure significances of Native American ancestry, especially of the Alabama-Coushatta Tribe, are administered with the utmost considerations. They could not identify any immediate impacts to religious, cultural, or historical assets of the Alabama-Coushatta Tribe of Texas and at this time raised no immediate objections to the proceeding with work at the site. They did indicate, however, that the proposed location exists in direct proximity to migratory routes and habitation sites utilized by ancestral members of the Alabama and Coushatta Tribes. As a habitable location, usage would have been seasonal while migratory routes were extensive, meandering north to south and east to west, either by season or time periods. In light of this, they do request immediate notification of any incidental discovery of human remains and/or archaeological artifacts as well as stopping all project work within 100 feet of incidental discovery until formal consultations with their offices are concluded.

Preferred Alternative: The preferred alternative is not anticipated to have a significant impact on tribal resources. In the event any archeological artifacts or human remains are identified during construction activities, The Shoulder agrees to cease all activities in proximity to the location pending consultation with the Alabama-Coushatta Tribes as well as the Alabama Historic Commission and FEMA.

No Action Alternative: The no action alternative would have no tribal resource impacts because there would be no construction activities.

## **4.7 Socio-Economic Issues and Environmental Justice**

According to the 2000 Census, the City of Daphne has a population of 16,581 or approximately 12% of the Baldwin County population of 140,415. The median household income of Baldwin County is \$52,603. Approximately 22% of the population is employed by education, health and social services, with the next highest employer being retail trade at 12%. Daphne occupies the coastal area on the west side of Baldwin County, is bounded by Spanish Fort (former location of the Shoulder), Malbis to the north-east, Belforest to the east and Montrose to the south.

The land use in the vicinity of the proposed site is largely residential, with the exception of the current building complex The Shoulder currently occupies north of the proposed site. The Lake Forest subdivision, reputed to be the largest subdivision in the state with over 3,500 homes is located north of the current leased facility and the proposed site. There are commercial areas roughly a mile to the west of the site.

### **4.7.1 Planning and Zoning**

The facility is to be located in a R3-Residential Zone (Figure 10). It is not a use permitted by right. However, the City of Daphne Land Use and Development Ordinance indicates that “Hospital, clinic, convalescent or nursing home, extended care facility or sanitarium for humans” may be permitted in an R-3 zone by Special Exception. Such approval, as presented in The City of Daphne Land Use and Development Ordinance (Adopted by City Council September 3, 2002 as amended), is granted when it is established through site plan review that the location, design, and proposed activities, will not adversely affect the public health, safety, morals and general welfare of the surrounding neighborhood.

Zoning approval from the City of Daphne has been obtained. The No Action Alternative and Preferred Alternative Action would be compatible with and would not change project site or project area land use or zoning.

### **4.7.2 Environmental Justice**

Executive Order (EO) 12898, “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations” was enacted on February 11, 1994. This EO directs federal agencies “to make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low income populations in the United States....” EO 12898’s goals are to achieve environmental justice, foster non-discrimination in federal programs, and give minority or low-income communities greater opportunities for public participation in and access to public information on matters relating to human health and the environment.

Socioeconomic and demographic data for the project area were analyzed to determine if a disproportionate number of minority or low income persons have the potential to be adversely affected by the proposed project.

The U.S. Census Bureau reportedly estimated the population for the Baldwin County to be 174,439 in 2008. The median value of a house or condo in 2000 was reportedly \$122,500. The estimated median household income in Baldwin County in 2008 was reportedly \$51,957 compared to \$42,586 statewide (US Census Bureau 2009). Of these County residents, 16,581 live in the City of Daphne. The majority of the city's population is white with 85%. Black or African American make up most of the remaining population with 12%. The other 3% of the city's population is made up of Hispanic or Latino and Asians, which include Chinese, Asian Indian, and Filipino.

The socioeconomic conditions of the project vicinity have been reviewed and would not have a disproportionately high or adverse impact on minority or low-income populations. The Preferred Alternative and the No Action Alternative will not affect the community's socioeconomic, ethnic, or cultural characteristics.

#### **4.7.3 Noise**

Preferred Alternative: The preferred alternative is in close proximity to a subdivision north of the site. There are residential dwellings surrounding the entire site, but not as dense as the subdivision. The preferred alternative will cause minor, temporary noise impacts on and near the site during construction. The construction is expected to be carried out during daytime hours, which would be the time of least disruption to surrounding residents. As previously described, the facility did receive zoning approval under the City of Daphne Land Use and Development Ordinance. The approval process required review as a Special Exception which would have considered impacts on surrounding areas and neighborhoods.

No Action: The no action alternative would have no effect on noise levels as no construction would occur.

#### **4.7.4 Traffic Impacts**

The proposed location is within a heavily developed area of City of Daphne, including several large subdivisions. The proposed location will be an extension to the cul-de-sac at the end of Roper Lane. Roper Lane currently extends approximately 1,000 feet from Pinehill Road to the end of a cul-de-sac where the entrance drive to the new facility would be constructed. Pinehill Road is a local connector approximately 1-mile long and running from County Road 11 to the west and Park Drive to south, both of which are major collector roads.

Preferred Alternative: The facility is not a large traffic volume generator. Traffic is largely staff, patients, and service personnel. The preferred alternative daily operations would not significantly change project area traffic conditions. The traffic on Roper Lane may increase slightly from the pre-construction average, but it would not be significant enough to cause disruption to the day to day flow of traffic.

No Action: The no action alternative would not change traffic conditions.

#### **4.7.5 Public Services and Utilities**

Daphne Utilities provides sewer, water and gas service in the City of Daphne. They are regulated by the Utility Board of the City of Daphne, Alabama and have Guidelines for Developers, Engineers and Architects for submittal of plans and specification. The facility is served by public water and sewer. As a use not permitted by right, The Shoulder has filed for and obtained zoning approval for the proposed development. Such approvals provide for consideration of the availability of public services.

#### **4.7.6 Public Health & Safety**

The facility is to be located in a R3-Residential Zone (Figure 9). It is not a “Permitted” use. However, the City of Daphne Land Use and Development Ordinance indicates that “Hospital, clinic, convalescent or nursing home, extended care facility or sanitarium for humans” may be permitted in an R-3 zone by Special Exception. Such approval, as presented in The City of Daphne Land Use and Development Ordinance (Adopted by City Council September 3, 2002 as amended), is granted when it is established through site plan review that the location, design, and proposed activities, will not adversely affect the public health, safety, morals and general welfare of the surrounding neighborhood.

The proposed facility will not produce or handle hazardous waste or materials. There are no identified Brownfield, Superfund or any facilities that are being cleaned up, or have been cleaned up under the RCRA (Resource Conservation and Recovery Act) Corrective Action Program that are located within the City of Daphne (See US EPA Envirofacts Data Warehouse), nor that could be affected by the proposed site development and construction.

#### **4.7.7 Phase 1 Environmental Site Assessment**

The Shoulder engaged the services of Earth Consulting Group, Inc. to complete a Phase 1 Environmental Site Assessment (July 21, 2008) as provided under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). The primary purpose of a Phase 1 Site Assessment is to identify to the extent feasible, any recognized environmental conditions, with respect to the range of contaminants identified within the scope of CERCLA and petroleum products, which by their association with the site could be or become an environmental liability. The Phase 1 Site Assessment was performed in general accordance with 40 CFR Part 312, *Standards and Practices for all Appropriate Inquiries*, as defined by the EPA and ASTM Standard Practice, E-1527-05, “*Standard Practice for Phase 1 Environmental Site Assessment: Phase 1 Environmental Site Assessment Process*”. Given the history of the subject property and the adjacent properties, it was the opinion of the consultant that no additional environmental site assessment appears warranted in relation to the subject property at this time.

Preferred Alternative: The preferred alternative would not change public health and safety conditions. The preferred alternative may stir up dust and other construction particles during construction. This would be temporary and would have no affect on Public Health and Safety.

No Action Alternative: The no action alternative would have no affect on public health and safety as no construction would occur.

## 4.8 Cumulative or Secondary Impacts

Cumulative effects are those "... which result from the incremental consequences of an action when added to other past and reasonably foreseeable future actions" (40 CFR 1508.7). An example of a cumulative effect would be the degradation of a stream's water quality by several developments which when taken individually would have minimal effects, but as a collective action would cause a measurable negative impact. Secondary effects are those impacts which are "... caused by an action and are later in time or further removed in distance but are still reasonably foreseeable" (40 CFR 1508.8), such as a new development attracted to the vicinity of an intersection created by a new highway facility.

Preferred Alternative: No significant cumulative or secondary impacts have been identified for the preferred alternative. The facility is not likely to encourage or discourage residential or commercial development within the area or immediate vicinity. The proposed site is zoned for residential development, however, as further described below the number of residential units potentially lost is small and not significant in comparison to the residential development within the area. The proposed location for the new facility is zoned R-3 High Density Residential. The maximum density allowed by zoning is 3.5 dwelling units per gross acre. With the proposed site covering 6.36 Acres this results in a maximum of 22.3 single family homes potential available for development. As compared to the preferred alternative this would not be anticipated to result in any significant cumulative or secondary impacts including traffic volume, water use or sewage generation.

No Action Alternative: The no action alternative would result in a reduction of the regions capacity to provide inpatient and outpatient services for those with drug and alcohol addictions.

## 5.0 - PUBLIC INVOLVEMENT AND AGENCIES CONSULTED

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The purpose for involving the public in the development of an EA is to “encourage and facilitate public involvement in decisions which affect the quality of the human environment” (40 CFR 1500.2) and to ensure “that environmental information is available to public officials and citizens before decisions are made” (40 CFR 1500.1(b)).

### 5.1 Public Involvement

The Shoulder submitted site plans for approval under the City of Daphne Land Use and Development Ordinance. The proposed facility required a Special Exception for development of a “Hospital, clinic, convalescent or nursing home, extended care facility or sanitarium for humans” within an R-3 Residential Zone. The review and approval process included notification of residents as well as a public hearing with the opportunity for public comment and no adverse comments have been received thus far. A public comment period for the Draft EA was completed November 28 - December 23, 2010 and no comments have been received.

### 5.2 Agencies Consulted

The following federal and state agencies were contacted in support of this EA. Copies of correspondence are included in the Appendices.

<b>State and Federal Agencies Consulted</b>	
M. Barnett Lawley, Commissioner Department of Conservation and Natural Resource, Montgomery, AL (See Consultation Letter- 26 February 2010)	Bill Pearson Supervisor USFWS, Daphne, AL. (See Consultation letter – 2/10/2010 and Response 2/24/2010.
Scott Brown, Chief, Coastal Unit Alabama Department of Environmental Management 1400 Coliseum Blvd. Montgomery, AL 36130-1463	Alabama Department of Environmental Management 1400 Coliseum Blvd. Montgomery, AL 36130-1463 Attention: Lud Hoffman, Air Division
Glenda Dean, Chief, NPDES Permits Alabama Department of Environmental Management 1400 Coliseum Blvd. Montgomery, AL 36130-1463	Colonel John Neubauer SHPO, Alabama State Historic Preservation Office, Montgomery, AL. (See Consultation Letter – 8 March 2010)

## 6.0 – REFERENCES AND LIST OF PREPARERS

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### 6.1 References

Alabama State Data Center

[http://www.alabama.gov/portal/style\\_text/secondary.jsp?page=Living\\_RecordsandStatistics](http://www.alabama.gov/portal/style_text/secondary.jsp?page=Living_RecordsandStatistics)

Alabama Department of Mental Health

<http://www.mh.alabama.gov/>

City of Daphne. The City of Daphne Land Use and Development Ordinance. Adopted by City Council September 3, 2002 as amended.

City of Daphne Community Development

<http://www.daphneal.com/planning/zone.asp>

FEMA. IS-9 Managing Floodplain Development Through The National Flood Insurance Program (NFIP)

[http://www.fema.gov/pdf/floodplain/is\\_9\\_complete.pdf#nameddest=critical](http://www.fema.gov/pdf/floodplain/is_9_complete.pdf#nameddest=critical)

NRCS (2010). USDA-Natural Resource Conservation Service-Web Soil Survey

<http://websoilsurvey.nrcs.usda.gov/app/HomePage.htm>

Phase 1 Environmental Site Assessment of the Approximate 6.36-Acre Tract Adjacent to 7400 Roper Lane (July 21, 2008. Daphne, Baldwin County, Alabama. Earth Consulting Group, Inc.).

Site Plans (October of 2009). Prepared by Speaks & Associates Consulting Engineers, Inc., 732 Oak Circle Drive, Mobile, Alabama, 36609.

U.S. Environmental Protection Agency (Non Attainment Areas).

<http://www.epa.gov/oaqps001/greenbk/ancl.html> (Non-Attainment Area)

U.S. Environmental Protection Agency (Envirofacts Data Warehouse)

<http://www.epa.gov/emefdata/em4ef.home>

U.S. Environmental Protection Agency (Enviromapper)

<http://www.epa.gov/enviro/index.html>

U.S. Fish and Wildlife Service (National Wetlands Inventory)

<http://137.227.242.85/wetland/wetland.html>

U.S. Fish and Wildlife Service (Coastal Barrier Resource Systems)

[http://www.fws.gov/habitatconservation/coastal\\_barrier.html](http://www.fws.gov/habitatconservation/coastal_barrier.html)

U.S. Census Bureau <http://quickfacts.census.gov/qfd/states/01/01003.html>

SAMHSA, 2010. Substance Abuse and Mental Health Services Administration (SAMHSA) of the U.S. Department of Health and Human Services  
<http://dasis3.samhsa.gov/>

Treatment Centers (2010). Drug Addiction Treatment Centers, Alcohol Rehab Programs, Dual Diagnosis and Addiction Treatment Resources <http://www.treatment-centers.net/>

The Good Drugs Guide (2010) Drug Rehabs and Treatment in Daphne, Alabama  
<http://www.thegooddrugsguide.com/treatment-centers/us/alabama/daphne/index.htm>

IS-9 Managing Floodplain Development through The National Flood Insurance Program (NFIP). FEMA  
[http://www.fema.gov/pdf/floodplain/is\\_9\\_complete.pdf#nameddest=critical](http://www.fema.gov/pdf/floodplain/is_9_complete.pdf#nameddest=critical)

Barry A Vittor & Associates Inc. (February, 2010). Wetland Condition Evaluation: D'Olive Creek, Tiawasse Creek, and Joe's Branch Watershed (Baldwin County, Alabama)  
<http://www.mobilebaynep.com/site/Forefront/D'Olive%20Wetland%20Report%20Final%20Feb%202010.pdf>

## 6.2 List of Preparers

William Straw, Ph.D. Regional Environmental Officer U.S. Department of Homeland Security FEMA - Region IV 3003 Chamblee Tucker Road, Hollins Bldg Atlanta, Georgia 30341	April Cummings Deputy Regional Environmental Officer U.S. Department of Homeland Security FEMA - Region IV 3003 Chamblee Tucker Road, Hollins Bldg Atlanta, Georgia 30341
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# APPENDICES

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## **Appendix A - Figures**

**Figure 1 – Location Map of Original, Current (Temporary) and Proposed Location**

**Figure 2 – Location Map – Showing proximity around proposed location**

**Figure 3 – Aerial View of Original, Current (Temporary) and Proposed Location**

**Figure 4 – Preferred Alternative - Aerial View of Vicinity**

**Figure 5 – Proposed Location shown on USGS Topographic Map**

**Figure 6 – Property Plan of Preferred Alternative**

**Figure 7 – Preferred Alternative – Proposed Development Plan**

**Figure 8 – Wetlands Inventory Map (USFWS)**

**Figure 9 – Flood Map (FIRMETTE) of Proposed Location**

**Figure 10 – Zoning Map – Town of Daphne**

## **Appendix B - Photographs**

## **Appendix C - Correspondence**

**Appendix C- 1: State of Alabama Emergency Management Agency**

**Appendix C- 2: Federal Environmental Agencies**

**Appendix C- 3: State Environmental Agencies**

**Appendix C- 4: Historic & Cultural Resources**

**Appendix C- 5: Tribal Governments**

## **Appendix D – Other**