

Draft Environmental Assessment

Monroe County School District Smithville Temporary School Facilities

Smithville, Monroe County, Mississippi

FEMA-1972-DR-MS



FEMA

**FEMA Region IV
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Appendix A – Site and Vicinity Maps

1. Area Map
2. Temporary Campus Overlay (see attached)
3. USGS Topographic Map
4. USFWS Wetlands Inventory Map
5. FEMA FIRM Maps

Appendix B – Resource Studies - Documents are not attached in email distribution. Documents are available on request.

1. USDA-NRCS Soil Report of Proposed Action Site
2. LESA Form
3. Town of Smithville POTW Capabilities Letter
4. FEMA Archaeologist/Historic Preservation Specialist Memo
5. 1998 Cultural Resources Study
6. MDOT Traffic Numbers

Appendix C – Consultation Notices

1. USFWS Consultation Notice
2. EPA-Region 4 Consultation Notice

Appendix D – Storm Water Pollution Prevention Plan (SWPPP) – Document is not attached in email distribution. Document is available on request.

Appendix E – Permits - Documents are not attached in email distribution. Documents are available on request.

1. Mississippi Water Pollution Control Act and Federal Water Pollution Control permit
2. Large Construction Storm Water General Permit MSR10

Appendix F – Site Photographs

List of Acronyms

A/E	Architectural and Engineering Firm
APE	Area of Potential Effects
BGS	Below ground surface
BMP	Best Management Practice
CAA	Clean Air Act
CEQ	President's Council on Environmental Quality
CFR	Code of Federal Regulations
CO	Carbon monoxide
CWA	Clean Water Act
dB	Decibel
EA	Environmental Assessment
EDR	Environmental Data Resources
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
FPPA	Farmland Protection Policy Act
LCNOI	Large construction notice of intent form
LESA	Land Evaluation and Site Assessment
MDAH	Mississippi Department of Archives and History
MEMA	Mississippi Emergency Management Agency
MCSD	Monroe County School District
MDOT	Mississippi Department of Transportation
NAAQS	National Ambient Air Quality Standards
NCA	Noise Control Act of 1972
NEPA	National Environmental Policy Act
NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act
NO2	Nitrogen dioxide
NPDES	National Pollutant Discharge and Elimination System (permit)
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places

O3	Ozone
OSHA	Occupational Safety and Health Administration
Pb	Lead
PM2.5	Particulate matter less than 2.5 microns
PM10	Particulate matter less than 10 microns
PNA	Poly-nuclear aromatic compounds
POTW	Publicly Owned Treatment Works
SHPO	State Historic Preservation Officer
SO2	Sulfur dioxide
SWPPP	Stormwater Pollution Prevention Plan
TCLP	Toxicity characteristic leaching procedure
USACE	U.S. Army Corps of Engineers
USDA	U.S. Department of Agriculture
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish & Wildlife Service
USGS	U.S Geological Survey
VOC	Volatile organic compound

1. Introduction

As a result of severe storms, tornadoes, straight-line winds and associated flooding in Mississippi between April 15 and April 28, 2011, a major disaster was declared under the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. §5121-5206 (the Stafford Act). The disaster was designated as FEMA-1972-DR. On April 27, 2011, an EF5 tornado struck the town of Smithville in Monroe County, Mississippi (MS), damaging most buildings in Smithville, including the Smithville K-12 school facility located on a 47-acre complex.

Due to the damages incurred during FEMA-1972-DR, the Monroe County School District (MCSD) located in Amory, Mississippi, applied through the Mississippi Emergency Management Agency (MEMA) to the Federal Emergency Management Agency (FEMA) for funding assistance. This funding is for the temporary relocation of the Smithville K-12 School facilities to a proposed 19.1-acre location in Smithville. In accordance with 44 Code of Federal Regulations (CFR) for FEMA, Subpart B, Agency Implementing Procedures, Part 10.9, this draft Environmental Assessment (EA) is being prepared pursuant to Section 102 of the National Environmental Policy Act (NEPA) of 1969, as implemented by the regulations promulgated by the President's Council on Environmental Quality (CEQ); 40 CFR Parts 1500-1508. The purpose of the EA is to analyze the potential environmental impacts of the proposed action, and to determine whether to prepare an Environmental Impact Statement (EIS) or a Finding of No Significant Impact (FONSI).

2. Purpose and Need

The objective of the FEMA Public Assistance grant program is to provide funding to state, tribal and local governments, and certain types of private non-profit organizations, in order for communities to quickly respond to and recover from major disasters or emergencies. The purpose of this proposed action is to provide funding to the MCSD for assistance with temporary school facilities for the Smithville K-12 school that was damaged by a catastrophic tornado and deemed unusable. A temporary school facility is needed to provide a short-term solution while the damaged school complex is repaired and ready to provide a permanent, safe and secure environment for its students and school staff. The tornado damaged the permanent Smithville K-12 facility with about two weeks left in the 2010-11 school year. With the 2011-12 school year rapidly approaching, temporary school facilities are needed to provide a safe and secure environment for about 600 students and 75 school staff members from Smithville and surrounding communities.

3. Alternatives

3.1 No Action Alternative

Under the No Action Alternative, FEMA would not provide funding to assist the MCSD in establishing quick, safe and secure temporary school facilities for students and school staff of the damaged Smithville K-12 school. Displaced students and school staff members would still be required to attend some alternative MCSD facilities resulting in critical issues related to safety, security, logistics of student drop-off and pick-up, bus transportation, food services, restroom capabilities, and space needs.

These would most likely be in or near Smithville, by practical necessity. The aforementioned critical issues make this an unworkable situation for the school district for any extended period of time.

3.2 Proposed Action

Construct temporary school facilities on 19.1-acres of undeveloped property in Smithville

The proposed 19.1-acre site is located south of MS Highway 25 North and west of Industrial Street in Smithville. The site is currently undeveloped property predominantly free of trees. The 19.1 acre site has been used as a hayfield for the past 15 years. The land adjoining the proposed site is comprised of the following: undeveloped land with numerous trees to the south; undeveloped land and a few residential lots to the west; a gravel road and an industrial warehouse to the east; and undeveloped land to the north. Railroad tracks operated by the Mississippian Railway Cooperative, Inc. are located just east of the proposed site. The site is currently owned and maintained by Monroe County and would be leased to MCSD for \$1 per year. Part of the proposed site was recently used by the U.S. Army Corps of Engineers (USACE) as a vegetative debris burn site related to the tornado damage. The USACE planned to have the site restored and returned to Monroe County by July 13, 2011. An area map outlining the proposed project site and general vicinity is included in Appendix A-1.

The project site would be disturbed to construct permanent utilities (water, sewage and electrical) prior to the placement of modular classroom units, support facilities, parking lots and a school bus drop-off/pick-up, turnaround and parking locations. The modular units would consist of 42 classrooms and 12 support facilities that will house about 600 students and 75 staff. Seven school buses would provide transportation to 350 students, 100 students are expected to drive to school and the remaining 150 students will be driven to school by parents/guardians. The total construction site would be approximately 900 ft long by 500 ft wide including the gravel access roads and paved parking lots. The site would be leveled to the elevation of 264 feet above mean sea level using existing site soils before the approximately 88,000 square foot gravel base is added for the modular buildings. Monroe County Power would install pole mounted site security lighting. A security fence would also be built around the temporary school facilities. A map overlaying the proposed temporary campus on an aerial photograph is included in Appendix A-2.

To reduce costs, MCSD will use furniture that was salvaged from the damaged permanent school facility. MCSD would also continue to prepare food at the permanent school location and transport it to a warming kitchen and serving lines located in the proposed temporary school facilities.

MCSD expects to need the proposed site for temporary school facilities for 18 to 24 months. After the permanent school facility is repaired and the temporary school facilities are no longer needed, the modular buildings would be removed by the vendor who supplied them. After the modular units are removed, site management would return to Monroe County. The permanent utilities, modular buildings pad, parking lots and drop off/pick up and turnaround locations and fencing would all be accepted by Monroe County.

3.3 Other Action Alternatives

Based on time, safety, site availability and cost constraints, there is no other action alternative being considered by MCSD that would provide a safe and secure learning environment for the students and school staff members of Smithville K-12 for the upcoming school year.

3.4 Alternatives Considered and Dismissed

Establish temporary school facilities at the Noe sports complex in Smithville

The Noe Complex in Smithville has been used for Smithville community baseball and softball teams for several years. The complex was heavily damaged by the tornado and would require significant repairs prior to the potential placement of temporary school facilities. If the temporary school facilities were placed here, no reconstruction of this sports complex would occur until after the temporary school facilities were removed. It would also negatively impact the local community by having no summer league sports complex for at least 18 to 24 months. There would also be more costs associated with this alternative due to restoration to the site's original condition and purpose. Based on time and costs constraints and the significant community impact of losing their community sports complex for an extended period of time, MCSD dismissed this location as a viable option for the temporary school facilities.

Establish temporary school facilities in purchased or leased former factory in Amory

According to MCSD, a 100,000 square foot former factory building is for sale or lease in Amory, MS. The facility is a wide-span metal building that has office space available, along with open areas that could be retro-fitted with walls and doors for classrooms. The building has suffered water damage and has only been used for storage for several years. MCSD dismissed this option because the significant cost to repair the HVAC and lighting systems, retrofitting the building to standard codes, outside work on parking, construction of a playground and much higher transportation costs associated with the location being 10 miles south of Smithville. The time it would take to get this building ready would not meet a reasonable schedule for the upcoming school year.

Use alternate schools within school district

This alternative would send displaced students to two alternate locations throughout the MCSD district. According to MCSD, there is simply not enough space in these alternate locations for the displaced students and school staff members for an extended period of time. The students and school staff completed the last 10-15 days of the 2010-11 school year at the two alternate locations and found this as a less than suitable situation for many reasons. The two alternate campuses are not designed to accommodate the additional 300 students per location. The option was considered a reasonable short term solution to finish the final two or three weeks of the 2010-11 school year, but MCSD thinks it would negatively impact the district over a longer period of time. The overflowing students onto these two campuses would pose safety, security and logistic issues of student drop-off and pick-up, bus

transportation, food service capabilities, restroom capabilities and sewer capabilities. MCSD considers this an unworkable and unreasonable option to meet upcoming school year needs.

4. Affected Environment and Potential Impacts

4.1 Physical Resources

The project area is located in Monroe County in north-eastern Mississippi. The proposed project site is located on 19.1 acres of undeveloped land in the Town of Smithville. The site is currently undeveloped property predominantly free of trees. The land adjoining the proposed site is comprised of the following: undeveloped land with numerous trees to the south; undeveloped land and a few residential lots to the west; a gravel road and an industrial warehouse to the east; and undeveloped land to the north. A U.S Geological Survey (USGS) topographic quadrangle map for the site (Appendix A-3) indicates the proposed site is undeveloped with relatively flat topography with a slight slope from east to west. Drainage ditches are shown to the north, west and south of the proposed site.

4.1.1 Geology and Soils

The U.S. Department of Agriculture (USDA), Natural Resources Conservation Service (NRCS) online Custom Soil Resource Report of the proposed site in Monroe County, Mississippi (Appendix B-1), dated July 2011, indicates the proposed project site's soils consisting mostly of Tilden fine sandy loam, with 0 to 2 percent slopes (savannah) and Stough fine sandy loam.

The soils consist of:

<u>Map Unit Symbol</u>	<u>Soil Types</u>	<u>Approximate Percent of Site</u>
St	Stough fine sandy loam	9.3%
TfA	Tilden fine sandy loam, 0 to 2% slopes	90.7%

The proposed project area's soils are classified as prime farmland, which is generally subject to the Farmland Protection Policy Act (FPPA) of 1981. The FPPA requires that consideration be given to impacts involving the conversion of farmland to non-agricultural uses. An evaluation of the impacts of Federal activities on prime or unique farmlands, or farmlands of unique local or state importance, is required by the implementing regulations 7 CFR 658. Federal agencies may use a Land Evaluation and Site Assessment (LESA) for this evaluation if the NRCS has approved one within the state or local government unit where a project will take place. Monroe County (FEMA did the consultation with NRCS) has an NRCS approved LESA, and the county is authorized to complete a Farmland Conversion Impact Rating form (AD-1006) to assess the potential impact of a Federal activity within the county to prime or other farmlands. Projects receiving a total score of less than 160 need not be given further consideration for protection and no additional sites need to be evaluated. The proposed site resulted in a site assessment score of 136 which means it does not need any further consideration for protection. The completed LESA form is in Appendix B-2.

No Action Alternative – Under the No Action Alternative, no construction of temporary school facilities would take place on the proposed site and there would be no impacts to soil or prime farmland.

Proposed Action Alternative – Under the Proposed Action Alternative, construction activities would not impact underlying geologic resources. Short-term impacts to soils would occur during the construction period. Existing vegetation will be stripped as needed within the construction limits of disturbance. Topsoil will be temporarily removed to level and reach the planned elevations to proposed parking lot areas, bus turn-a-round, and building footprint areas. Topsoil will be stockpiled within the disturbed areas, then used for various construction activities, with any excess spread on-site prior to seeding. No topsoil is anticipated to be hauled off-site. Appropriate best management practices (BMPs) would be used to minimize soil erosion and sedimentation. The applicant will have a Storm Water Pollution Prevention Plan (SWPPP) prepared for the construction project (Appendix D).

4.1.2 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 CAA, the U.S. Environmental Protection Agency (USEPA) 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 buildings and crops. The 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 USEPA (USEPA 2011), Monroe County and the project area is in an attainment area for all criteria pollutants.

No Action Alternative – Under the No Action Alternative, no construction of temporary school facilities would occur on the proposed site, but there would be increased travel to more distant alternate school facilities for about 600 students and 75 school staff until the damaged school facilities are repaired and operational again. This would increase some criteria pollutants, such as CO, NO₂, O₃, PM₁₀, and non-criteria pollutants such as volatile organic compounds (VOCs). However, this would not be permanent, and it result in criteria air pollutants below USEPA thresholds.

Proposed Action Alternative – Under the Proposed Action, short-term impacts to air quality would occur during construction activities. To reduce impacts, the construction contractors would be required to wet down construction areas as needed to mitigate fugitive dust. Emissions from fuel-burning engines (e.g., heavy equipment and earthmoving machinery) could also temporarily increase the levels of some of the criteria pollutants, such as CO, NO₂, O₃, PM₁₀, and non-criteria pollutants such as VOCs. The limited construction period in conjunction with the few pieces of equipment needed for the proposed action would result in criteria air pollutants well below USEPA thresholds.

4.2 Water Quality

4.2.1 Water Resources

The Clean Water Act (CWA), as amended in 1977, established the basic framework for regulating discharges of pollutants into waters of the United States. The 19.1-acre proposed site is currently used as a hayfield. The project site topography is relatively flat with an elevation difference of approximately 5 feet, sloping from east to west (Appendix A-3). There is no visible perennial surface water located on the proposed site. The runoff ultimately drains to an existing ditch just west of the proposed site. There are also drainage ditches to the north and south of the site. There are no wells located on site. The Town of Smithville supplies the city with treated water and treats sewage waters at their Publicly Owned Treatment Works (POTW). A letter prepared by the Town of Smithville's engineer (Appendix B-3) indicates their POTW would have the capacity to handle the temporary school facilities wastewater capacity. The POTW is authorized to discharge under provisions of Mississippi Water Pollution Control Act and Federal Water Pollution Control permit # MS0043001 (Appendix E-1). The letter also indicates the associated pump stations and overall collections system would have the capabilities to handle the temporary school facilities. The applicant submitted a large construction notice of intent form (LCNOI) to the Mississippi Department of Environmental Quality (MDEQ) to be in compliance with the Large Construction Storm Water General Permit MSR10. The applicant had a SWPPP prepared for the construction activities proposed on the site as required by MDEQ to be in compliance with the Large Construction Storm Water General Permit MSR10 (Appendix E-2).

No Action Alternative – Under the No Action Alternative, no construction of temporary school facilities would occur on the proposed site and there would be no impacts to water resources.

Proposed Action Alternative – Under the Proposed Action Alternative, there would be little to no direct adverse impacts to water resources. To reduce stormwater impacts during construction, and to reduce stormwater impacts after construction from permanent impermeable surfaces to be left after the temporary school buildings are removed, the applicant would implement appropriate BMPs that are outlined in their SWPPP. No notable adverse impacts to groundwater are anticipated.

4.2.2 Wetlands

Presidential Executive Order (EO) 11990 (Protection of Wetlands) requires Federal agencies to consider direct and indirect impacts to wetlands that could result from their actions, and attempt to minimize the destruction, loss, and degradation of wetlands.

A U.S. Fish and Wildlife Service (USFWS) national wetlands inventory map (Appendix A-4) indicates there are no wetlands located on the proposed project site. A site visit confirmed that there are no jurisdictional wetlands on the proposed project site.

No Action Alternative – Under the No Action Alternative, no construction of temporary school facilities would occur on the proposed site and there would be no adverse impacts to wetlands.

Proposed Action Alternative – Under the Proposed Action Alternative, there would be no direct adverse impacts to wetlands. Runoff rates in both time and duration will change as a result of the proposed action. Higher intensity rainfall will generally produce a greater peak discharge as impervious surfaces increase in a watershed. The proposed action will increase the impervious surface within basin. Existing grass surfaces will be replaced with gravel roadways, rooftops which prevent and change the infiltration of rainfall into underlying soils, adjacent woodlands and riparian areas. Riparian areas will not be modified by the proposed action. The infiltration rate within the project area will shorten. With a shortened infiltration rate, higher peak storm water runoff may increase erosion rates in natural courses and may alter wetland wet and dry periods.

4.2.3 Floodplains

Presidential EO 11988 (Floodplain Management) requires Federal agencies to avoid direct or indirect support of development within the 100-year floodplain whenever there is a practicable alternative. 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. FEMA uses Flood Insurance Rate Maps (FIRMs) to identify the regulatory 100-year floodplain for the National Flood Insurance Program (NFIP). The proposed site is located outside of the 100-year floodplain according to FIRM Map # 28095C0045, dated March, 1988.

No Action Alternative – Under the No Action Alternative, no construction of temporary school facilities would occur on the proposed site and there would be no impacts to the floodplain.

Proposed Action Alternative – Under the Proposed Action, best available data from FIRM Map # 28095C0045, dated March, 1988 (Appendix A-5) shows the proposed site is located within Zone X, outside of the 100-year floodplain. No significant impacts to the floodplain are anticipated from runoff and stormwater drainage changes.

4.3 Biological Resources

4.3.1 Vegetation, Fish, Wildlife and Threatened and Endangered Species

The proposed project site is currently an undeveloped agricultural field. No tree clearing will be done for the proposed project. A dense wooded area adjoins the proposed site to the south and there are some bordering trees to the north and east.

In accordance with Section 7 of the Endangered Species Act (ESA) of 1973, the project area was evaluated for the potential occurrences of federally listed threatened and endangered species. Through an informal consultation process, the USFWS Mississippi Field office provided a letter (Appendix C-1) on a threatened plant found in Monroe County and their recommendations to minimize the adverse effects of emergency operations on any protected species.

The Price’s potato bean (*Apios priceana*) is found in Monroe County. It is usually located in wooded areas that grade into creek and river bottoms. USFWS states there is no appropriate habitat for this

species on the proposed site; however, the plant could be affected by increased sedimentation in nearby water bodies.

The following are the USFWS recommendations to that should be considered and implemented, where possible, to avoid and reduce adverse impacts to any protected species.

- Restrict unnecessary off-road operation of heavy equipment or material storage.
- Minimize the removal of woody vegetation.
- Minimize soil erosion and sedimentation.

To minimize soil erosion and sedimentation during and after construction into nearby drainage ditches, the applicant will implement appropriate BMPs that are outlined in their SWPPP.

No Action Alternative – Under the No Action Alternative, no construction of temporary school facilities would occur on the proposed site and there would be no impacts to vegetation, fish, wildlife, or threatened and endangered species.

Proposed Action Alternative – Under the Proposed Action, no impacts to the listed Price’s potato bean (*Apios priceana*) species, its habitats, or other critical habitats would occur.

4.4 Cultural Resources

4.4.1 Historic Properties and Archeological Resources

In addition to review under NEPA, consideration of effects to historic properties is mandated under Section 106 of the National Historic Preservation Act (NHPA), as amended, and implemented by 36 CFR Part 800. Requirements include identification of historic properties that may be affected by the Proposed Action, typically those within the Area of Potential Effects (APE). Historic properties are defined as archaeological sites, standing structures, or other historic resources 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 appropriate State Historic Preservation Officer (SHPO), what effect, if any, the action will have on historic properties. Moreover, if the project would have an adverse effect on these properties, FEMA must consult with the SHPO on ways to avoid, minimize, or mitigate the adverse effect.

On August 9, 1998, an archaeologist conducted a cultural resources survey for Monroe County of 30 acres of which the proposed site was included. The report prepared for Monroe County indicated there were no recorded archaeological sites within the survey area. The report recommended the surveyed area be considered cleared of significant cultural resources. A copy of the report is included in Appendix B-5.

FEMA assessed the proposed action's potential to affect historic properties, including the potential for discovery of archaeological artifacts that might be present in the APE. On June 29, 2011, a FEMA Archaeologist and Historic Preservation Specialist visited the proposed action site. A copy of his memo to the file outlining his informal examination of the site is included in Appendix B-4. No prehistoric or historic artifacts or historical or archaeological sites were observed during his visit. In his opinion, the proposed site has little or no potential for the presence of sites that might be eligible for listing in the NRHD. He believes there would be no affect on cultural or historic resources if the proposed site was used for temporary school facilities.

During construction, ground disturbing activities would be monitored. If any human skeletal remains or any historic or archaeological materials are discovered during construction, ground-disturbing activities within 100 feet of the "discovery" would immediately stop, and the Applicant would notify the coroner's office (in the case of human remains), FEMA, and the Mississippi Department of Archives and History (MDAH) within one business day. Construction may start or continue elsewhere on the project site, except within 100 feet of any other such "discoveries". After FEMA has satisfactorily completed any additional requirements for any discovery, construction may resume in the applicable area.

No Action Alternative – Under the No Action Alternative, no construction of temporary school facilities would occur on the proposed site and there would be no impacts to cultural resources or historic properties.

Proposed Action Alternative – Under the Proposed Action, impacts to cultural resources or historic properties are unlikely.

4.5 Socioeconomic Resources

4.5.1 Environmental Justice

Presidential 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 analyzed to determine if a disproportionate number of minority or low-income persons have the potential to be adversely affected by the proposed project. There are no zoning standards for the Town of Smithville.

The U.S. Census Bureau 2000 data for Smithville, Mississippi, lists a total population of 882, of which 97.6% are white, 1.6% are African-American, 0.8% are Hispanic or Latino, 0.002% are of some other race or two or more races, and there are no native American Indian or Alaska Natives (U.S. Census, 2000). The medium family income in the community was \$38,750. No disproportionately high concentration of minority or low income populations were identified near the proposed project site.

No Action Alternative – Under the No Action Alternative, no construction of temporary school facilities would take place on the proposed site, but students and school staff would travel greater distances to

alternate facilities until the damaged school is repaired and operational again. With school district provided transportation, no disproportionately high and adverse effects on minority or low-income populations would occur.

Proposed Action Alternative – Under the Proposed Action, there would be no disproportionately high and adverse impacts on minority or low-income populations. Implementation of the Proposed Action would benefit most all populations in Smithville and the surrounding communities.

4.5.2 Noise

Noise is generally defined as undesirable sound and is federally regulated by the Noise Control Act of 1972 (NCA). Although the NCA gives the USEPA the authority to prepare guidelines for acceptable ambient noise levels, it only charges those federal agencies that operate noise-producing facilities or equipment to implement noise standards. The USEPA guidelines, and those of many federal agencies, state that outdoor sound levels in excess of 55 decibels (dB) are “normally unacceptable” for noise-sensitive land uses such as residences, schools, and hospitals. All temporary construction activities would follow applicable city ordinances.

No Action Alternative – Under the No Action Alternative, no construction of temporary school facilities would occur on the proposed site, but with student and school staff travel to more distant school facilities, there would be minor, temporary increased noise impacts until the damaged school is repaired and operational again.

Proposed Action Alternative – Under the Proposed Action, only temporary short-term increases in noise levels would be anticipated during the construction, operation, and removal of the temporary facilities. To reduce noise levels during that period, construction activities would be restricted to normal business hours to the extent possible. Equipment and machinery utilized at the site would meet all local, State, and Federal noise regulations. Normal school related activities would not generate noise levels that are likely to adversely affect nearby residences. Over the long term, no significant change to noise levels would be anticipated.

4.5.3 Transportation

The proposed project site is adjoined by Industrial Loop Road which would serve as the access road to the proposed site. Industrial Loop Road connects to Industrial Street at two separate locations. The northern access to the site off Industrial Loop Road would serve as the primary entrance for school buses to enter and leave their proposed pick-up/drop-off locations. The southern access to the site off Industrial Loop Road would serve as the primary entrance for school staff; students who drive themselves to school, and students that would be picked up and dropped off by parents or guardians.

MS Highway 25 (Main Street) runs east/west through Smithville just north of the proposed site and serves as the main access route to Industrial Street. The proposed action would add traffic numbers to the immediate area during construction activities and during days the temporary school is in use. The Mississippi Department of Transportation (MDOT) was consulted for a sample of traffic numbers along and near the proposed project (Appendix B-6). Daily traffic numbers just south of Highway 23 indicate

over 5,000 daily vehicle trips, 2,200 on Highway 25 north of Highway 23, 2,600 on Highway 23 and 4,600 daily vehicle trips half ways between Smithville and Amory.

Railroad tracks run through the Town of Smithville and are located east of the proposed site location. The railroad tracks are operated by the Mississippian Railway Co-op. Buses and vehicles traveling to the temporary school facilities may need to cross the railroad tracks where they intersect with Highway 25 and Parkview Drive. According to the General Manager for the Mississippian Railway Co-op, passive crossings are required to have a set of cross-bucks, advance warning signs and pavement markings with a stop strip. He stated that the railroad intersection safety devices at the intersection with Highway 25 are the responsibility of the State of Mississippi and the Town of Smithville is responsible for the track intersection safety devices at the Parkview Drive intersection. The applicant would make sure both railroad crossings meet all local, state and federal requirements prior to the opening of, and during the operation of the temporary school facilities.

No Action Alternative – Under the No Action Alternative, no construction of temporary school facilities would occur on the proposed site, but there would be minor transportation impacts from travel to and from alternate school facilities until the damaged school is repaired and operational again.

Proposed Action Alternative – Under the Proposed Action, traffic volume would temporarily increase immediate around the proposed project site due to construction activities. Traffic disruptions on Highway 25 and slower traffic flow would be likely during construction and during operating school days, especially during peak drop off and pick up times, while the temporary school is in operation. To mitigate potential traffic delays, most construction vehicles, equipment, and materials will be stored on the proposed action site. Appropriate traffic control and signage would be utilized. There would be increases in vehicular traffic along Highway 25, Industrial Street, Parkview Drive and Industrial Loop Road on school days and primarily in the hour before school starts and the hour after school dismisses. These minor impacts would occur until the temporary school facilities are removed.

4.5.4 Public Services and Utilities

This section describes the existing public services and utilities that would service the proposed temporary school location, including law enforcement and fire protection, medical facilities, electricity, water, wastewater, and solid waste.

Water

The potable water supply would be provided by the Town of Smithville water treatment facility. Permanent water lines would remain on the proposed site after the temporary facilities are removed.

Sanitation (sewage)

The wastewater produced at the temporary school facility would be treated at the Town of Smithville's POTW. Permanent sewer lines would remain on the proposed site after the temporary facilities are removed.

Solid Waste Disposal

Solid waste pick-up and disposal services would be provided by Monroe County. The solid waste would be taken to:

Monroe County Solid Waste Department
52076 Highway 8 E
Aberdeen, MS 39730-9691

Electric Power

Electric power would be supplied to the temporary school facilities by Monroe County Power. Monroe County Power would add four transformers to their existing power lines located just west of the proposed temporary school facility. The power line would connect to a temporary power pole provided by the contractor that will then supply the temporary school facility.

Law Enforcement

The Smithville Volunteer Police and the Monroe County Sheriff's Department would provide law enforcement services for the temporary school facilities.

Fire Protection

The Smithville Volunteer Fire Department would provide fire and rescue services for the temporary school facilities.

Emergency Medical and Hospital

The closest hospital that would serve the temporary school facility is:

Gilmore Memorial Regional Medical Center
1105 Earl Frye Blvd
Amory, Mississippi 38821

No Action Alternative – Under the No Action Alternative, no construction of temporary school facilities would occur on the proposed site, and even with the use of other alternate temporary school facilities in Smithville, there would be no notable impacts to public services or utilities.

Proposed Action Alternative – Under the Proposed Action, there would be minor, temporary increased impacts to most public services and utilities in the project site, and potential increased impacts from future use of the site after the temporary school facilities are removed and the permanent utilities remain for potential future use,

4.5.5 Safety and Security

To minimize risks to public health and safety, all construction activities would be done using qualified personnel trained in the proper use of the appropriate equipment, including all appropriate safety precautions. During construction, the contractor has the responsibility to implement a site specific safety plan. Measures will be in place during construction that would readily allow emergency vehicles to access the site if needed. Additionally, all activities would be conducted in a safe manner in accordance with the standards specified in Occupational Safety and Health Act (OSHA) regulations. EO 13045, Protection of Children, requires federal agencies to make it a high priority to identify and assess environmental health and safety risks that may disproportionately affect children. Safety and security of all populations will meet all applicable local, State, and Federal regulations.

No Action Alternative – Under the No Action Alternative, no construction of temporary school facilities would occur on the proposed site, and even with travel to other alternate temporary school facilities in Smithville, there would be no increased impacts to safety and security.

Proposed Action Alternative – Under the Proposed Action, all construction activities would occur on the proposed action site which is currently undeveloped agricultural property. Construction activities would present safety risks to those performing the activities. Access to the site would be restricted to protect the public and to minimize risks to public health and safety. The appropriate signage and barriers would be in place prior to construction activities to alert school children, pedestrians and motorists of project activities. Following all safety precautions, activities would impose no disproportionate health and safety risks to children.

4.6 Hazardous Materials

The proposed project site is currently 19.1 acres of undeveloped agricultural property. A FEMA contractor conducted a site reconnaissance of the proposed site on July 5, 2011. No visible evidence of dumping or improper disposal of hazardous substances or petroleum products were observed on the proposed site. No evidence of liquid or solid waste dumping, discolored flowing or ponded water, abnormal odors, or hazardous substance or petroleum containers were observed on the proposed site. A reconnaissance of the adjoining properties was also performed during the site visit to determine if evidence of off-site sources of contamination existed that could have impacted the proposed site. No visible signs of contamination or other evidence that hazardous substances or petroleum products have been used, stored, or disposed of on the adjoining properties in such a manner that they might impact the proposed site were observed.

USACE used part of the proposed site as a vegetative debris reduction site for the Town of Smithville's vegetative debris after the April 27, 2011 tornado. Prior to utilizing the vegetative debris reduction site, USACE completed a Baseline Environmental Conditions Report to determine and record baseline environmental conditions on the proposed site. USACE contracted with Environmental Data Resources, Inc. (EDR) to obtain information on regulated sites around the proposed site. The EDR report compiles publicly-available information from sites listed in certain regulatory databases and located within search distances recommended by ASTM Practice E 1527-05. Through this search of reasonable ascertainable

local, state, tribal and federal environmental records for the proposed site and the surrounding vicinity, there were no reported sites on or near the proposed site.

USACE also collected three soil samples on the vegetative debris reduction site to determine if there were any contaminants of concern on the site. The soil samples were collected at a depth of 1-foot below ground surface (BGS) and analyzed for semi-volatile compounds, volatile organic compounds (VOCs), toxicity characteristic leaching procedure (TCLP) metals, total metals, reactive cyanide and sulfide, ignitability and pH. All samples were non-detect/non-reactive and pH was in normal ranges, therefore there was no evidence of environmental related contamination on the proposed site.

USACE will collect additional soil samples after the vegetative reduction site is cleaned up and re-graded. Three soil samples will be collected from the same general area as the original samples collected for the USACE Baseline Environmental Conditions report. These samples will be analyzed to determine if the operation of the USACE vegetative reduction site contaminated the property. In addition, USACE will collect three soil samples on behalf of FEMA to determine if the rest of the proposed action site is clear of contamination. This Draft EA is written on the basis that the proposed project site not contaminated. However, if contamination is reported based on the additional soil sampling results, MDEQ cleanup measures would have to be completed before the proposed site would be available for temporary school facility use.

On the project site, temporary construction activities would use the planned gravel parking lots and bus areas as staging areas for construction materials and disposal items. After reuse and recycling considerations, disposal of any construction materials would be disposed of by the contractor and taken to the Monroe County Solid Waste Department (Class I rubbish site) at 52076 Highway 8 E, in Aberdeen, MS 39730-9691. All applicable safety plans, local, State and Federal regulation would be followed.

No Action Alternative – Under the No Action Alternative, no construction of temporary school facilities would occur on the proposed site and there would be no impacts related to solid waste or hazardous materials.

Proposed Action Alternative – Under the Proposed Action, no solid waste or hazardous materials related impacts would be anticipated. Proposed construction activities are temporary, and should not expose or produce hazardous materials. However, any hazardous materials discovered, generated, or used during construction would be handled and disposed of in accordance with applicable local, State, and Federal regulations. There would be no impact changes anticipated related to solid waste or hazardous materials.

4.7 Cumulative Impacts

A cumulative impact is defined as “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. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. In accordance with NEPA and to the extent reasonable and practical, this EA considered the combined effect of the Proposed Action and other actions occurring in the vicinity of the

proposed project site. No cumulative impacts would be expected if the No Action Alternative was implemented. Use of other alternate temporary school facilities would result in no notable net change. The proposed project's utilities, gravel modular buildings pad, fencing, gravel parking lots and drop off access locations would remain in place after the temporary school facilities are removed, but no net long-term cumulative impacts are anticipated.

5. Agency Coordination and Public Involvement

FEMA is the lead Federal agency for conducting the NEPA compliance process for the proposed MCSD temporary school facilities in Smithville, Monroe County, Mississippi. It is the goal of the lead agency to expedite the preparation and review of NEPA documents, as well as be responsive to community needs and to the purpose and need of the proposed action, while meeting the intent of NEPA and complying with all NEPA provisions. A copy of the Public Notice is included in Appendix D.

MCSD will notify the public of the availability of this Draft EA through publication of a Public Notice at the following locations:

1. The MCSD office at 1619 Highway 25 North, Amory, MS and website: <http://www.mcsd.us/>
2. Town of Smithville Mayor's Temp Office (Police trailer) 60001 Franklin Street, Smithville, MS
3. On a power pole located at the proposed site of the temporary school facility
4. Renaissance Bank located at 63471 Highway 25 North in Smithville, MS

FEMA will conduct an expedited public comment period (3 days) starting on the initial date of publication of the Public Notice.

If no significant adverse public comments are received during the public comment period, and if the USACE soil test results are satisfactory, then this Draft EA will be changed with minor revisions to become the Final EA for this proposed project.

6. Government Coordination and Permits

The following government entities and organizations were contacted and/or consulted, which helped to provide project information and/or review in support of preparation for this EA. Relevant documentation received to date is included in Appendix C.

1. Mississippi Emergency Management Agency
2. Mississippi Department of Environmental Quality
3. Mississippi Department of Transportation
4. Town of Smithville
5. Monroe County
6. Monroe County School District
7. United States Fish and Wildlife Service, Mississippi Field Office
8. United States Army Corps of Engineers – Vicksburg District
9. Mississippi Soil and Water Conservation Commission
10. United States Environmental Protection Agency – Region 4

11. National Resources Conservation Service (farmland conversion)
12. Mississippi Department of Wildlife, Fisheries and Parks
13. Mississippian Railway Cooperative

In accordance with applicable local, State, and Federal regulations, the applicant is responsible for acquiring any necessary permits before starting construction at the proposed project site.

7. List of Preparers

Preparation and review of the Draft EA and Final EA:

Ryan Lawless, Fluor Government Group

Bert Bowen, Environmental Historic Preservation Specialist, FEMA Region 10

William R. Straw, Ph.D. Regional Environmental Officer, FEMA Region 4

8. References

The following government references were used as guidance and/or consulted, which helped to provide project information and/or perspective in support of preparation of this EA. Other references used to support project-specific details for the Proposed Action are in the MCSD office.

FEMA. Accessed 2011. National Environmental Policy Act, FEMA Desk Reference.
www.fema.gov/library/viewRecord.do?id=3249

FEMA. 2011. Guidelines for the Preparation of an Environmental Assessment.
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Accessed July 2011. U.S. Department of Agriculture. 2011. Natural Resources Conservation Service, Farmland Conservation Impact Rating. <http://policy.nrcs.usda.gov/programs/fppa/>.

Accessed July 2011. U.S. Fish and Wildlife Service. 2011. <http://www.fws.gov/wetlands>.

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Federal Emergency Management Agency (FEMA) FIRM Map. (Map Number

28095C0045) dated March, 1988.

Mississippi Department of Environmental Quality (MDEQ), Current Status with Air Quality Standards, 2011. Accessed at:
http://www.deq.state.ms.us/MDEQ.nsf/page/Air_AirQualityPlanningandEmissionStandards?OpenDocument

Baseline Environmental Conditions Report, Smithville, Mississippi. Prepared for USACE. May 2011.

United States Department of Agriculture (USDA) Web Soil Survey
<http://websoilsurvey.nrcs.usda.gov/app/HomePage.htm>