

**Eight-Step Planning Process for Floodplains and Wetlands
Bay-Waveland School District
Central Administration Office and Annex Building Project**

<p>Step 1: Determine whether the Proposed Action is located in a wetland and/or the 100-year floodplain (500-year floodplain for critical actions), and whether it has the potential to affect or be affected by a floodplain or wetland.</p>	<p>Project Analysis: The proposed project would construct the facility on a site where a portion of the site is located within the 100-year floodplain. To minimize impacts to the floodplain, the proposed Central Administration Office and Annex Buildings would be constructed on the southern portion of the site, outside the 100-year floodplain. Construction of facility parking would require the placement of fill material, converting approximately 0.5-acres of 100-year floodplain to areas outside the floodplain.</p> <p>According to National Wetlands Inventory Maps and a site visit conducted by a NISTAC Environmental Specialist on August 3, 2011, the proposed project site contains no wetlands.</p>
<p>Step 2: Notify public at earliest possible time of the intent to carry out an action in a floodplain or wetland, and involve the affected and interested public in the decision-making process.</p>	<p>Project Analysis: The Bay-Waveland School District will notify the public of the availability of the draft EA through publication of a public notice in a newspaper of general circulation when the EA is made available for public review.</p>
<p>Step 3: Identify and evaluate practicable alternatives to locating the Proposed Action in a floodplain or wetland.</p>	<p>Project Analysis: The Applicant considered the following alternatives in selecting the proposed action:</p> <p><i>No Action Alternative:</i> Under the No Action Alternative, no replacement facility would be constructed and BWSO would continue to use the temporary facilities on the south side of Ulman Avenue to house its administrative functions. These temporary facilities are not designed for long-term use and therefore do not meet the school district’s need for permanent administrative facilities.</p> <p><i>Construct New Administration Building (Proposed Action):</i> Under the Proposed Action Alternative, BWSO would construct a new Central Administration Office Building and Annex Building on approximately 1.8 acres of the 3.6-acre BWSO property at 213 Ulman Avenue in Bay St. Louis. The proposed site is located immediately north of the Second Elementary School and adjacent to the BWSO’s Ingram Building (see Figure 2).</p> <p>The Central Administration Office Building will be a 10,000 to 11,000-square-foot one-story steel structure with metal stud infill. The Central Administration Office Building will have brick veneer/stucco on the exterior and will exhibit features in character with the surrounding neighborhood. The proposed Annex Building would be located just to the west of the</p>

proposed Central Administration Office Building and would house both the Maintenance and Information Technology Departments (Figure 3). The Annex Building will be a 2,000 to 3,000-square-foot pre-engineered structure with metal stud and masonry infill. An access drive from Ulman Avenue will be constructed between the Ingram Building and the new Central Administration Office Building, with a 56-space parking area constructed behind and around the two proposed buildings.

The project site is an open lot in a residential setting that is currently vacant, but housed temporary classroom trailer units after Katrina. The terrain is relatively flat, with a slight slope to the north/northwest and vegetation on the site primarily consists of grasses and other herbaceous plants, with trees and shrubs along the margins. The new buildings and access road would be located in Zone X (shaded), outside the 100-year floodplain, but the parking area would be partially within the 100-year floodplain (Zone AE).

The existing Main Administration Building would be mothballed and maintained by BWSO, in accordance with the Memorandum of Agreement (MOA), executed on September 14, 2011.

Repair Main Administration Building and Reconstruct Central Administration Maintenance Building in Place (not included in EA because it does not meet the purpose and need): The BWSO also considered options to restore the Main Administration Building to pre-disaster condition and reconstruct a Central Administration Maintenance Building within their original respective footprints. However, the BWSO determined that the existing Main Administration Building does not meet current building code and standards that would result in additional rehabilitation work to restore the building to pre-disaster condition. In addition, rehabilitation of the existing Main Administration Building and reconstruct a Central Administration Maintenance Building would not accommodate the need for additional office space to consolidate District staff and operations. Therefore, this alternative was dismissed from further consideration.

<p>Step 4: Identify the full range of potential direct or indirect impacts associated with the occupancy or modification of floodplains and wetlands, and the potential direct and indirect support of floodplain and wetland development that could result from the Proposed Action.</p>	<p>Project Analysis: Under the Proposed Action Alternative, impacts to the floodplain would occur. The proposed project would construct the facility on a site where a portion of the site is located within the 100-year floodplain. Construction of facility parking would require the placement of fill material, converting approximately 0.5-acres of 100-year floodplain to areas outside the floodplain. The loss of floodplain in the vicinity of the project is considered a minimal adverse effect. Flooding in the Bay St. Louis area is predominantly driven by inadequate drainage as a result of flat topography, and tidal storm surge. The conversion of floodplain to non-floodplain and the creation of additional impervious surfaces would not likely result in an appreciable increase in flood velocities or elevations upstream or downstream. Indirect impacts include supporting the ongoing occupancy on the floodplain that occurs within the Bay St. Louis area. Although the project does not encourage additional development in the floodplain, the project will result in providing civic support to existing populations living in the floodplain. The mothballing and maintenance of the existing Main Administration Building would not impact floodplain. The project has no direct or indirect wetland impacts.</p>
<p>Step 5: Minimize the potential adverse impacts from work within floodplains and wetlands (identified under Step 4), restore and preserve the natural and beneficial values served by wetlands.</p>	<p>Project Analysis: To minimize impacts to the floodplain, the proposed Central Administration Office and Annex Buildings would be constructed on the southern portion of the site, outside the 100-year floodplain.</p>
<p>Step 6: Reevaluate the Proposed Action to determine: 1) if it is still practicable in light of its exposure to flood hazards; 2) the extent to which it will aggravate the hazards to others; 3) its potential to disrupt floodplain and wetland values.</p>	<p>Project Analysis: The Proposed Action remains practicable based on constructing the proposed buildings on a portion of the project site located outside of the 100-year floodplain. Only the parking lot will be located within the 100-year floodplain. The project is not anticipated to aggravate hazards to others within the 100-year floodplain because of its coastal setting. Flooding in the Bay St. Louis area is predominantly driven by inadequate drainage as a result of flat topography, and tidal storm surge. The conversion of floodplain to non-floodplain and the creation of additional impervious surfaces would not likely result in an appreciable increase in flood velocities or elevations upstream or downstream.</p>

<p>Step 7: If the agency decides to take an action in a floodplain or wetland, prepare and provide the public with a finding and explanation of any final decision that the floodplain or wetland is the only practicable alternative. The explanation should include any relevant factors considered in the decision-making process.</p>	<p>Project Analysis: A public notice will be published informing the public of FEMA’s decision to proceed with the project. This notice will include rationale for floodplain impacts; a description of all significant facts considered in making the determination; a list of the alternatives considered; a statement indicating whether the action conforms to State and local floodplain protection standards; a statement indicating how the action affects the floodplain; and a statement of how mitigation will be achieved.</p>
<p>Step 8: Review the implementation and post-implementation phases of the Proposed Action to ensure that the requirements of the EOs are fully implemented. Oversight responsibility shall be integrated into existing processes.</p>	<p>Project Analysis: This step is integrated into the NEPA process and FEMA project management and oversight functions.</p>