

**FEDERAL EMERGENCY MANAGEMENT AGENCY (FEMA)  
FINDING OF NO SIGNIFICANT IMPACT (FONSI)  
SPRINGFIELD CITY COMPLEX PROJECT  
CITY OF SPRINGFIELD, BAY COUNTY, FL  
FEMA-4399-DR-FL  
PA-04-FL-4399-PW-00860-PN 77072**

**BACKGROUND**

On October 11, 2018, President Trump signed a disaster declaration (FEMA-4399-DR-FL) for the State of Florida (recipient) due to damages caused by Hurricane Michael between October 7, 2018, and October 19, 2018. This disaster declaration authorized the Department of Homeland Security's (DHS) Federal Emergency Management Agency (FEMA) to provide federal assistance to the designated areas. The City of Springfield, the subrecipient, is seeking funding from FEMA in the form of Public Assistance (PA) grant funding to replace several demolished municipal facilities and relocate City Hall, Fire Department, Police Department, and Public Works Department to a new City Complex located in the City of Springfield, Bay County, Florida.

In October 2018, wind-driven rain, and flying debris due to Hurricane Michael removed the roof system off many of the facilities, allowing water into the interior and causing significant damage. As a result of the damage, the entire roofing systems were compromised, and the heavy rains infiltrated into the structural, electrical, and mechanical systems. The heavy damage precluded the ability to repair the facilities back to pre-disaster condition. Most of the facilities were demolished due to extreme damage, including city hall, police station, fire station, fire department sub-station, community building, Shaw buildings, and purchasing warehouse. City Hall was forced to temporarily relocate to the Public Library at 408 School Ave. The City's Police Department was also forced to relocate and is housed in a temporary trailer structure on the same property as the library.

The proposed site of the new city complex is located at the intersection of E. 11th Street and Transmitter Road, Springfield, Bay County, Florida (GPS Coordinates: 30.168131, -85.608581). The location is 1.1 miles north of the current location of city hall and is more centrally located to the current boundaries of the city and will provide a single location for many of the City's services. The proposed tract consists of an undeveloped cleared grassland parcel to the south and a cleared parcel previously used as a commercial plant nursery to the north. In addition, the city purchased a 1.15-acre tract adjacent to the northern boundary of the proposed City Complex for use as a laydown yard for the Public Works Department. The city also purchased the 20.7-acre lot adjacent to the west side of the tract for construction of a Nature Park. The city has plans to use a portion of this tract to construct a stormwater pond as part of the drainage system for the City Complex. The existing buildings already present on the tract were demolished and the tract has been cleared. No new construction has been started on this project at the time of drafting this EA.

In January 2024, an Environmental Assessment (EA) was prepared by FEMA to document the agency's determinations. A public notice was posted on the city's website, at the proposed project location, and on FEMA's website. The EA is available for viewing by visiting the following websites:

**FEMA WEBSITE LOCATION:**

<https://www.fema.gov/emergency-managers/practitioners/environmental-historic/nepa/environmental-assessment-city-5>

**CITY OF SPRINGFIELD WEBSITE LOCATION:**

<https://www.springfieldfl.net/community/page/springfield-future-now-alert-bay-and-public-notice-website-click-here>

## **FINDINGS**

The Proposed Action as described in the EA would impact physical, water, biological, cultural and socioeconomic resources. Minor impacts to soils, surface waters, terrestrial and aquatic environments, migratory birds, vegetation, wetlands, fish and wildlife, land use, transportation, and environmental justice are anticipated. In addition, long-term positive effects to water resources and water quality, terrestrial and aquatic environments, fish and wildlife, floodplains, and wetlands from the creation of the stormwater drainage pond and system are expected. Impacts to occupational health & safety, noise, drinking water, air quality, climate change, hazardous materials/wastes and solid wastes, and Bald and Golden eagles are negligible. No impacts to public services and utilities, coastal resources, farmland, fisheries, wild and scenic rivers, threatened or endangered species, or cultural resources are anticipated.

In consideration of the overall impacts of the proposed action in relation to impacts from past, present, and reasonably foreseeable future activities, the proposed action is not expected to have significant adverse cumulative impacts on any resource.

## **CONDITIONS**

- For the preferred alternative, the City of Springfield (Applicant) has received a FDEP Environmental Resource Permit (ERP) (Permit No. ERP #IND-005-305567-1), which constitutes consistency review under the state's coastal zone management program. The permit also constitutes a water quality certification under Section 401 of the Clean Water Act. The permit includes general and project specific conditions for the project. Springfield would need to obtain another FDEP ERP permit before constructing the Phase II Pond.
- Under Alternative 3, State Historic Preservation Office (SHPO)/National Historic Preservation Act (NHPA) Conditions are applicable:
  - If human remains or intact archaeological deposits are uncovered, work in the vicinity of the discovery will stop immediately and all reasonable measures to avoid or minimize harm to the finds will be taken. The applicant will ensure that archaeological discoveries are secured in place, that access to the

sensitive area is restricted, and that all reasonable measures are taken to avoid further disturbance of the discoveries. The applicant's contractor will provide immediate notice of such discoveries to the applicant. The applicant will contact the Florida Division of Historic Resources and FEMA within 24 hours of the discovery. Work in the vicinity of the discovery may not resume until FEMA has completed consultation with SHPO, Tribes, and other consulting parties as necessary. If unmarked human remains are encountered during permitted activities, all work will stop immediately, and the proper authorities will be notified in accordance with Florida Statutes, Section 872.05.

- If prehistoric or historical artifacts such as pottery or ceramics, projectile points, dugout canoes, metal implements, historic building materials, or any other physical remains that could be associated with the Native American, early European, or American settlement are encountered at any time within the project site area, the permitted project shall cease all activity involving subsurface disturbance in the vicinity of the discovery. The applicant shall contact the Florida Department of State, Division of Historical Resources, Compliance Review Section at (850) 245-6333. Project activities shall not resume without verbal and /or written authorization. In the event that unmarked human remains are encountered during permitted activities, all work will stop immediately, and the proper authorities will be notified in accordance with Florida Statutes, Section 872.05.
- Under Alternative 2 and 3, all handling and disposal of demolition debris generated during construction activities would be handled with in a manner consistent with FDEP and state regulations.

## CONCLUSIONS

Based on the findings of the EA, coordination with the appropriate agencies, comments from the public, and adherence to the project conditions set forth in this FONSI, FEMA has determined that the proposed project qualifies as a major federal action that will not significantly affect the quality of the natural and human environment, nor does it have the potential for significant cumulative effects. As a result of this FONSI, and in accordance with FEMA Instruction 108-1-1, an EIS will not be prepared, and the proposed project as described in the attached EA may proceed.

**APPROVAL**  
**SCOTT T**  
**FLETCHER**

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# **Draft Environmental Assessment**

**City of Springfield New City Complex**

**FEMA-4399-DR-FL**

**Bay County, Florida**

**January 2024**



**FEMA**

**U. S. Department of Homeland Security**

Region 4 – Atlanta, GA

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## **APPENDICES**

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- B Floodplain/Wetland Map
- C EO 11988 Floodplain Management 8-Step Checklist
- D Northwest Florida Water Management District Environmental Resource Permit No.  
ERP IND-005-305567-1
- E USFWS IPaC Species List
- F Ecological Site Assessment
- G City of Springfield Commission Meetings Minutes Public Comments
- H Indigo Snake Protection/Education Plan
- I Floodplain Administrator Letter



## **ACRONYMS AND ABBREVIATIONS**

APE	Area of Potential Effects
BFE	Base Flood Elevation
BGEPA	Bald and Golden Eagle Protection Act
BO	Biological Opinion
BMP	Best Management Practices
CATEX	Categorical Exclusion
CBRA	Coastal Barrier Resource Act
CBIA	Coastal Barrier Improvement Act
CDBG	Community Development Block Grant
CEQ	Council on Environmental Quality
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CF	Cubic Feet
CFR	Code of Federal Regulations
CWA	Clean Water Act
CY	Cubic Yards
CZMA	Coastal Zone Management Act
DHS	Department of Homeland Security
DR	Major Disaster Declaration
EA	Environmental Assessment
EFO	Emergency Final Order
EIS	Environmental Impact Statement
EJ	Environmental Justice
EO	Executive Order
EPA	Environmental Protection Agency
ERP	Environmental Resource Permitting
ESA	Endangered Species Act
FBC	Florida Building Code
FDEP	Florida Department of Environmental Protection

FDOT	Florida Department of Transportation
FEMA	Federal Emergency Management Agency
FGS	Florida Geological Service
FIRM	Flood Insurance Rate Map
FMSF	Florida Master Site File
FNAI	Florida Natural Areas Inventory
FONSI	Finding of No Significant Impact
GIS	Geographic Information System
GPS	Global Positioning System
IPaC	Information for Planning and Consultation
JAXBO	Jacksonville District's Programmatic Biological Opinion
LF	Linear Feet
MBTA	Migratory Bird Treaty Act
MFR	Memorandum for Record
MANLAA	May Affect Not Likely to Adversely Affect
MSA	Magnusson-Stevens Fishery Conservation and Management Act
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service
NPDES	National Pollutant Discharge Elimination System
NPS	National Park Service
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NRCS	Natural Resource Conservation Service
NWFWMD	Northwest Florida Water Management District
NWI	National Wetlands Inventory
OPA	Otherwise Protected Area
OSHA	Occupational Safety and Health Administration
PA	Public Assistance

PA	Programmatic Agreement
PL	Public Law
PPE	Personal Protective Equipment
R2P2	Recovery and Resilience Partnership
RCRA	Resource Conservation and Recovery Act
RHA	Rivers and Harbors Act
RMP	Risk Management Plan
SF	Square Feet
SHPO	State Historic Preservation Office
SPBO	Statewide Programmatic Biological Opinion
SSA	Sole Source Aquifer
Stafford Act	Robert T. Stafford Disaster Relief and Emergency Assistance Act
SWPPP	Stormwater Pollution Prevention Plan
TSCA	Toxic Substances Control Act
USACE	United States Army Corps of Engineers
USFWS	United State Fish and Wildlife Service
WOTUS	Waters of the United States

## 1.0 INTRODUCTION

On October 9, 2018, President Trump signed a disaster declaration (FEMA-4399-DR-FL) for the State of Florida (recipient) due to damages caused by Hurricane Michael between October 7, 2018, and October 19, 2018. This disaster declaration authorized the Department of Homeland Security’s (DHS) Federal Emergency Management Agency (FEMA) to provide federal assistance to designated areas of Florida. This assistance was provided pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), and Public Law (PL) 93-288, as amended. Section 406 of the Stafford Act authorizes FEMA’s Public Assistance (PA) Program to repair, restore, and replace state and local government and certain private nonprofit facilities damaged as a result of the event.

The City of Springfield (subrecipient), located in Bay County, Florida was designated to receive federal assistance for this disaster. The City of Springfield has applied for funding from FEMA under the PA program to replace several demolished municipal facilities (Table 1.1) by relocating and reconstructing them to a new City Complex as a result of damages incurred from FEMA-4399-DR-FL. The new City Complex (City Hall, Police Station, Fire Station, and Public Works buildings) would meet the current Florida Building Code (FBC) (2020). The proposed location for the new City Complex is located at the intersection of East 11th Street and Transmitter Road, Springfield, Bay County, Florida (GPS Coordinates: 30.168131, -85.608581). The municipal facilities that will not be repaired or replaced following damages incurred from FEMA-4399-DR-FL but whose funding will be used to augment the construction of the City Complex are shown in Table 1.1. For the streets, road signs, and signals projects, funding from these projects represent excess funds that were not used in the repair to the facilities and will be applied to the construction of the City Complex instead.

**Table 1.1. Original municipal facilities location and construction dates**

Facility	Location	Coordinates	Construction Date
City Hall and Police Station	3529 3 <sup>rd</sup> St	30.15337, -85.61499	1942
Fire Station and Contents	3726 East Third St	30.15271, - 85.61068	1978
Community Building	3728 East Third St	30.15238, -85.61028	1978
Park and Sports Complex Facilities	4901 Sports Ln.	30.14578, -85.60826	Sports Complex: 2002; McLemore Park: 1978; Walking Park: 1984; Henry Brooks Park: 1999;  Boat ramp: 1985
	3728 East 3 <sup>rd</sup> St.	30.15536, -85.60074	
	301 Kilbourn Ave.	30.15199, -85.61049	
	Corner of East 7th St & Transmitter Rd.	30.15376, -85.6142	
	Corner of Bayou Ave & Cherry St	30.15972, -85.60734	

Facility	Location	Coordinates	Construction Date
Fire Dept Sub-station	2533 Transmitter Rd	30.19389, -85.60856	1967
Shaw Bldgs. and Storage Unit	162 Detroit Ave	30.14965, -85.60860 30.14648, -85.60860 30.14967, -85.60900 30.14944, -85.60894 30.14957, -85.60834	Training Bldg. 1: 1952; Storage Bldg. 2: 1963; Training Bldg. 3: 1990; Files & Equip Bldg. 4: 1961; Storage Bldg.: 1990
Vehicle Maintenance Shop and Wash Bay	3500 East 4th St	30.15466, -85.61547 30.15468, -85.61520	Shop: 1985 Wash Bay: 1977
Purchasing and Public Works Warehouses	3535 East 4th St; 3509 East 4th St	30.15524, -85.61423 30.15587, -85.61441 30.15534, -85.61513 30.15558, -85.61540 30.15497, -85.61577	PW Warehouse: 1956; Purchasing Warehouse: 1956; Sign Shop: 1990; Water Shop: 1985; Maintenance Bldg.: 1972
Road Damages, Road Signs, and Signals	City-wide	multiple	--

In addition to the location of the proposed city structures, the City of Springfield owns two additional lots that will provide space for other functions related to the City Complex. The tract to the north will provide a laydown yard for the Public Works Department. The tract to the west will be utilized for the construction of a stormwater pond as part of the stormwater drainage system and for development into a wetland park complete with boardwalks. The proposed actions presented by the City of Springfield do not qualify for use of DHS Categorical Exclusion (CATEX) N6 for Federal Assistance for the Relocation and Realignment of Structures and Facilities because the proposed project activities to relocate the facilities to another parcel of land, comprising approximately 16 acres, is greater than one acre threshold of this CATEX.

This draft Environmental Assessment (EA) has been prepared in accordance with the National Environmental Policy Act (NEPA) of 1969, (PL 91-190, as amended), and its implementing regulations 40 Code of Federal Regulations (CFR) Part 1500 to 1508), and FEMA’s procedures for implementing NEPA (FEMA Instruction 108-1-1). FEMA is required to consider potential environmental impacts before funding or approving actions and projects. This draft EA will analyze the potential environmental impacts of the proposed project. 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).

## 2.0 PURPOSE AND NEED

The objective of FEMA’s PA Grant Program is to assist the community in recovering from the damage caused by natural disasters. As a result of Hurricane Michael, the City of Springfield’s

municipal facilities experienced damage from strong winds and rain. The purpose of this project is to restore a permanent, accessible, and centralized location for critical municipal services while also addressing access issues caused by the future widening of E. 3<sup>rd</sup> Street proposed by FDOT at the location of the original City Hall and Police Station building. Plans for the proposed municipal complex were underway prior to Hurricane Michael to provide a larger, more modern facility to accommodate the city's growth, and the property at the intersection of E. 11th Street and Transmitter Road had already been purchased by the City of Springfield for this purpose. In addition, the facility will be more centrally located within the city's municipal boundaries. The city's ability to remain fully functional is critical for the equity of care for everyone in the City of Springfield.

In accordance with federal laws and FEMA regulations, the EA process for a proposed federal action must include an evaluation of alternatives and a discussion of the potential environmental impacts. This EA was prepared in accordance with FEMA's regulations as required under NEPA. As part of this NEPA review, the requirements of other environmental laws and executive orders are addressed.

### **3.0 PROJECT LOCATION AND BACKGROUND**

The sites of the city facilities' original locations were scattered across the city, see Table 1.1 for details. These locations were heavily developed, surrounded by other commercial buildings, residential housing, and small businesses. The municipal facilities offered administrative, emergency, and recreational services for residents of all ages within the town of approximately 8,063 people. The town measures 4.2 square miles.

In October 2018, wind-driven rain, and flying debris due to Hurricane Michael removed the roof system off many of the facilities, allowing water into the interior and causing significant damage. As a result of the damage, the entire roofing systems were compromised, and the heavy rains infiltrated into the structural, electrical, and mechanical systems. The heavy damage precluded the ability to repair the facilities back to pre-disaster condition. Most of the facilities were demolished due to extreme damage, including city hall, police station, fire station, fire department sub-station, community building, Shaw buildings, and purchasing warehouse. City Hall was forced to temporarily relocate to the Public Library at 408 School Ave. The City's Police Department was also forced to relocate and is housed in a temporary trailer structure on the same property as the library. Some services have had limited availability since the storm.

The proposed site of the new city complex is located at the intersection of E. 11th Street and Transmitter Road, Springfield, Bay County, Florida (GPS Coordinates: 30.168131, -85.608581). The City Complex will serve the functions of City Hall, emergency response (Police Department and Fire Department), and Public Works along with associated training rooms and storage space. All remaining damaged facilities will not be repaired using FEMA funds, which will instead be

used as a funding source for the construction costs of the City Complex. The city purchased the 7.17-acre property for this purpose prior to Hurricane Michael in March 2018. The location is 1.1 miles north of the current location of city hall and is more centrally located to the current boundaries of the city and will provide one location for many of the City's services. The proposed tract consists of an undeveloped cleared grassland parcel to the south and a cleared parcel previously used as a commercial plant nursery, featuring 1,200 SF residential building, 1,600 SF building, and three greenhouse/storage buildings totaling 3,700 SF to the north. No work has been started on this project at the time of drafting this EA although the existing buildings were demolished, and the tract has been cleared. In addition, the city purchased a 1.15-acre tract adjacent to the northern boundary of the proposed City Complex for use as a laydown yard for the Public Works Department. The city also purchased the 20.7-acre lot adjacent to the west side of the tract for construction of a Nature Park. The city has plans to use a portion of the tract to construct a stormwater pond as part of the drainage system for the City Complex, which will also be considered as part of this Environmental Assessment.

## **4.0 ALTERNATIVES**

The alternatives considered in addressing the purpose and need stated are the No Action Alternative (Alternative 1), the replacement of the municipal facilities at their original locations to meet Florida building codes (Alternative 2), and the Preferred Action Alternative (Alternative 3), which includes constructing a City Complex at an alternate location to meet Florida building codes.

### **4.1. Alternative 1 – No Action Alternative**

Under Alternative 1, the City of Springfield's new City Complex relocation and upgrade project would not be implemented. Most city management would continue to be housed in the converted Public Library and emergency functions in a temporary trailer located adjacent to the library. With the No Action Alternative, continued negative impacts to the community may be experienced as city services would be limited.

### **4.2. Alternative 2 – Replacement and Repair of the Municipal Facilities at the Original Locations**

Under Alternative 2, the City of Springfield would reconstruct the City facilities to their pre-disaster design, capacity, function, and location with appropriate changes due to current codes and standards and Hazard Mitigation measures in Springfield, Bay County, Florida. While this alternative does restore the facilities, they would not be centrally located to the City's population. City services would continue to function in multiple locations across the city in facilities that the city has largely outgrown. Additionally, the City Hall and Police Station would lose their property frontage and parking when the FDOT proceeds with the widening of E 3<sup>rd</sup> Street.

### **4.3. Alternative 3 – Construction of New City Complex at an Alternate Location (Preferred Alternative)**

Under the preferred alternative, the City of Springfield would construct and operate a new, larger City Complex on a currently undeveloped parcel of land and former commercial plant nursery at the intersection of 11th Street and Transmitter Road, Springfield, Bay County, Florida. The new complex would consist of the 6,632 SF City Hall, 5,935 SF Police Station, 11,191 SF Fire Station, and 15,565 SF Public Works Building. The city would also use the 1.15-acre tract adjacent to the northern boundary of the proposed City Complex as a laydown yard for the Public Works Department. The 20.7-acre lot adjacent to the west side of the tract would be used for construction of a stormwater pond to service the proposed City Complex. The complex would allow the city to operate municipal services in a central location with necessary space for training and records storage that was not available in their previous facilities. In addition, the complex would include a vehicle impound lot, parking areas, work area, and a stormwater management system. The City of Springfield's proposed new City Complex will be designed and developed in compliance with all applicable standards and regulations. Other elements of the plans include exterior site lighting, signage, fencing and sidewalks. The utilities would be underground and would be connected to both the existing and new utilities along E. 11<sup>th</sup> Street and Transmitter Road. Stormwater would be managed by diverting water from the roof by downspouts to underground piping to the planned retention pond. In addition, paving and sitework would be graded to flow towards the retention pond.

### **4.4. Alternatives Considered and Dismissed**

The City of Springfield considered one other alternative location for the new facility. Parcel 14975-000-000 which is currently owned by Springfield Community Church and located 0.32 miles east of the proposed site. It was dismissed as viable because the owner of the parcel refused to sell at the time the city was looking for a new location for a centralized municipal complex. No other sites were identified as viable due to the lack of size and location.

## **5.0 AFFECTED ENVIRONMENT AND POTENTIAL CONSEQUENCES**

The CEQ notes: "Effects includes ecological (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic, cultural, economic, social, or health, whether direct, indirect, or cumulative. Effects may also include those resulting from actions which may have both beneficial and detrimental effects, even if on balance the agency believes that the effect will be beneficial" (40 CFR §1508.8).



When possible, quantitative information is provided to establish potential impacts; otherwise, the potential qualitative impacts are evaluated based on the criteria listed in Table 5.0 below.

**Table 5.0: Impact significance and context evaluation criteria for potential impacts**

Impact Scale	Criteria
None/Negligible	The resource area would not be affected and there would be no impact, OR changes or benefits would either be non-detectable or, if detected, would have effects that would be slight and local. Impacts would be well below regulatory standards, as applicable.
Minor	Changes to the resource would be measurable, but the changes would be small and localized. Impacts or benefits would be within or below regulatory standards, as applicable. Mitigation measures would reduce any potential adverse effects.
Moderate	Changes to the resource would be measurable and have either localized or regional scale impacts/benefits. Impacts would be within or below regulatory standards, but historical conditions would be altered on a short-term basis. Mitigation measures would be necessary, and the measures would reduce any potential adverse effects.
Major	Changes to the resource would be readily measurable and would have substantial consequences/benefits on a local or regional level. Impacts would exceed regulatory standards. Mitigation measures to offset the adverse effects would be required to reduce impacts, though long-term changes to the resource would be expected.

### 5.1. Eliminated Resource Topics Due to Negligible Impacts

Certain resource areas or specific regulations relating to resource areas were eliminated from further analysis in this EA if no impacts or negligible impacts were anticipated as a result of the “No Action” or implementation of any of the Proposed Action Alternatives. Table 5.1 presents the resource areas or regulations eliminated from further evaluation with a brief discussion for the rationale.

**Table 5.1: No Impact Anticipated**

Resource Area or Regulation Eliminated	Rationale
Public Services and Utilities	No impacts anticipated to electrical, water, gas, telecom, or other public utilities from actions evaluated in this EA.

Resource Area or Regulation Eliminated	Rationale
Coastal Barrier Resource Act (CBRA)/ Coastal Barrier Improvement Act (CBIA)	No impacts anticipated to any coastal barrier islands from actions evaluated in this EA.
Farmland Protection Policy Act of 1981	No impacts anticipated to prime or unique farmlands from actions evaluated in this EA. The soils present are not classified as prime farmland by the NRCS.
Magnuson-Stevens Fishery Conservation and Management Act (MSA)	No impacts anticipated to fisheries from actions evaluated in this EA.
Wild and Scenic Rivers Act of 1968	Implementation of proposed action alternatives 2 and 3 are not anticipated to affect the designated Wild and Scenic River segments in Florida. Potential actions evaluated in this EA would occur along the coastal shorelines. Presently, there are no designated Wild and Scenic River segments that interest the Florida coastline.

Additional resources areas or specific regulations relating to resource areas were eliminated from further analysis if anticipated impacts were considered either non-detectable or, if detected, would have impacts that would be slight and local. Table 5.2 presents the resource areas or regulation eliminated from further evaluation based on anticipated negligible impact and a brief discussion of the rationale.

**Table 5.2: Negligible Impact Anticipated**

Resource Area or Regulation Eliminated	Rationale
Occupational Health and Safety	Implementation of Proposed Action Alternatives 2 and 3 involves workers on site. To minimize occupational health and safety risks, workers would wear and use appropriate personal protective equipment (PPE) and follow all applicable Occupational Safety and Health Administration (OSHA) standards and procedures. The impacts to occupational health and safety are expected to be negligible when compared to the No Action Alternative.

Resource Area or Regulation Eliminated	Rationale
Climate Change	Implementation of Proposed Action Alternatives 2 and 3 involves fuel usage by the construction equipment. The fuel usage would result in minor, short-term impacts from temporary air emissions. These temporary emissions would be expected to be below regulatory standards and would have a minor impact.
Clean Air Act (Air Quality)	Implementation of proposed action alternatives 2 and 3 will involve the burning of fossil fuels associated with the use various vehicle and the routine operation of various dump trucks, and heavy equipment. However, the impacts to air quality are expected to be negligible when compared to the No Action Alternative.
RCRA\TSCA\CERCLA (Hazardous Materials)	Implementation of proposed action alternatives 2 and 3 are not likely to involve the handling, storage, use or creation of hazardous materials in regulatory reportable quantities. Additionally, proposed actions are not anticipated to occur at sites impacted by hazardous waste.
Safe Drinking Water Act of 1974	Implementation of proposed action alternatives 2 and 3 are not anticipated to affect the three Sole Source Aquifers (SSAs) in Florida. The Alternatives do not involve the storage, transport of hazardous, toxic, or pathogenic materials such as solvents, road salt, manure, petroleum products or sewage.
Bald and Golden Eagle Protection Act	Implementation of proposed action alternatives 2 and 3 are not anticipated to affect Golden or Bald Eagles or their respective habitat. Golden eagles inhabit tundra, grasslands, forested habitat and woodland-brushlands, south to arid deserts and avoid nesting in urban habitat. Bald eagles live near rivers, lakes, and marshes where they can find food. Bald eagles require a good food base, perching areas, and nesting sites and as such usually choose the tops of large trees to build nests. Both species habitats are inconsistent with the project location, therefore, the presence of golden and bald eagles is unlikely to occur within the project area and no impacts are expected.

Resource Area or Regulation Eliminated	Rationale
Noise	FEMA anticipates negligible noise impacts from proposed action alternatives 2 and 3 since the use of heavy equipment will be limited. Noise generated from construction activities described in the Alternatives would be intermittent, produced only during operational work hours and only for the duration of the project activities. Additional noise from emergency vehicles would be infrequent and temporary, similar to sirens prior to the storm.

## 5.2. Physical Resources

### 5.2.1. Geology and Soils

According to the Florida Geological Survey (FGS), the landform on which the project area is located is considered Apalachicola Delta district, Lower Delta Province. The Florida stratigraphic geology of the project area is from the Pleistocene and Holocene within the Quaternary Period with elevations of less than 40ft. The sediments include quartz sands, carbonate sands, muds, and organics. According to Natural Resources Conservation Service (NRCS) soil data accessed on June 28, 2023, soils underlying the proposed City Complex area include: Hurricane Sand with 0% to 2% slope (National Map unit 2ttkn), described as rises and flats and Plummer Sand with 0% to 2% slope (National Map unit brv2), described as flats on marine terraces. The associated stormwater pond is underlain with Plummer Sand and Pamlico-Dorovan complex (National Map unit brtq), described as flood plains on marine terraces.

#### 5.2.1.1. **Alternative 1: No Action Alternative**

Alternative 1 would not involve any construction activities or regrading, thus there would be no impact to existing geology and soil conditions.

#### 5.2.1.2. **Alternative 2: Replacement of the Municipal Facilities at the Original Locations**

Under Alternative 2, the reconstruction of the existing municipal facilities would disturb soils during grading, paving, and facility construction activities. Soils in the area have been previously disturbed during construction of the original municipal facilities and other development in the area. Based on the review conducted, alternative 2 would have minor impact on soils. Short-term impacts due to construction activities would be minimized by implementing best management practices and by following the conditions of applicable required permits.

### **5.2.1.3. Alternative 3: Construction of the New City Complex at an Alternate Location (Preferred Alternative)**

Under Alternative 3, the relocation and construction of the City Complex would significantly disturb soils during grading, paving, and facility construction activities. Approximately sixteen acres of ground disturbance is anticipated from the proposed project activities. Soils in this area have been previously disturbed within the upland portion of the project area. This area consists of an undeveloped cleared grassland parcel to the south and a cleared parcel once containing a commercial plant nursery, featuring 1,200 SF residential building, 1,600 SF building, and three greenhouse/storage buildings totaling 3,700 SF. These have been demolished, causing further disturbance of the soils. An “L-shaped” lot along the northern boundary includes an access road and 2,013 SF pole barn once used by Anytime Tree Services. The pole barn will remain for use by the Springfield Public Works Department. The western portion of the proposed City Complex will be used to construct retention ponds as part of the stormwater drainage system for the City Complex and surrounding area. This area remains undeveloped although Hurricane Michael destroyed the trees that once covered the lot. Based on the review conducted, Alternative 3 would have a minor impact on soils in the upland portion of the development with more significant impacts to the wetlands to the west. Impacts due to the construction activities would be minimized by implementing best management practices and by following the conditions of the Florida Department of Environmental Protection (FDEP) permit obtained for the proposed work.

## **5.3 Water Resources**

### **5.3.1. Clean Water Act (CWA)**

The CWA establishes the basic structure for regulating discharges of pollutants into the waters of the United States (WOTUS) and regulating quality standards for surface waters (<https://www.epa.gov/laws-regulations/summary-clean-water-act>). Section 404 of the CWA establishes a program to regulate the discharge of dredged or fill material into WOTUS, including wetlands. Activities in waters of the United States regulated under this program include fill for development, water resource projects (such as dams and levees), infrastructure development (such as highways and airports) and mining projects. Section 404 requires a permit before dredged or fill material may be discharged into WOTUS, unless the activity is exempt from Section 404 regulation (e.g., certain farming and forestry activities).

In Florida, a NPDES stormwater construction permit is required from the Florida Department of Environmental Protection (FDEP) for any proposed project that would disturb at least one or more acres of land and those that discharge stormwater to surface waters of the state. As part of this permit, the proponent of the project is required to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP), which outlines Best Management Practices (BMPs) and engineering

controls to be used to prevent and minimize erosion, sedimentation, and pollution during construction.

The threshold level for a significant impact to surface water would be a violation of state water quality criteria, a violation of federal or state discharge permits, or an unpermitted dredge or fill within the boundary of a jurisdictional waterbody or wetland.

**5.3.1.1. Alternative 1: No Action Alternative**

Under the No Action Alternative, the City of Springfield would not rebuild nor relocate their municipal facilities, and no construction activities would be involved. Therefore, there would be no impacts to WOTUS.

**5.3.1.2. Alternative 2: Replacement of the Municipal Facilities at the Original Locations**

Under Alternative 2, the reconstruction of the existing city facilities at their current locations would require a ground disturbance. The city would be required to obtain an NPDES stormwater construction permit from the FDEP and to prepare and implement an associated SWPPP. Replacement of the Cherry Street boat ramp would require a 404 permit from USACE since it lies within Lake Martin and is within the jurisdiction of the USACE. Based on the review conducted, however, Alternative 2 would have minor impacts on surface waters.

**5.3.1.3. Alternative 3: Construction of the New City Complex at an Alternate Location (Preferred Alternative)**

Under Alternative 3, the relocation and construction of the new City Complex would require ground disturbance of approximately sixteen acres. According to FDEP's online mapper, the proposed location of the City Complex is not under USACE 404 jurisdiction so a 404 permit would not be required. The City of Springfield would follow state and local stormwater and erosion control requirements, however. They would also be required to obtain an NPDES stormwater construction permit from the FDEP and to prepare and implement an associated SWPPP. Stormwater would be managed at the new facility by diverting water from the roof by downspouts to underground piping, leading to a proposed retention pond along the southwestern portion of the complex. Paving and sitework would be graded to flow towards the retention pond, which would create new areas for surface water storage. The proposed on-site stormwater management retention pond will be constructed in two phases.

The Phase I pond would be constructed to function during the construction of the City Complex, and the city has already obtained a NPDES permit for this phase and prepared an associated SWPPP (Appendix A). The Phase I pond will then be demolished during the construction of the

Phase II Pond. The city would apply for another NPDES stormwater construction permit from the FDEP to prepare and implement the associated SWPPP for the Phase II Pond. During all of the project activities, appropriate stormwater management BMPs would be implemented to prevent sediment intrusion into the adjacent wetland, eliminating the potential for the project to potentially impact jurisdictional waters. These BMPs would occur during the entire life of the project. In addition, if any of the City Complex project activities include stockpiling of soil or fill on-site, the contractor would cover these soils to help prevent fugitive dust from entering stormwater pathways. Based on the review conducted, Alternative 3 would have minor impacts on surface waters.

### **5.3.2. Executive Order 11988 (EO 11988) Floodplain Management**

Executive Order 11988, Floodplain Management (EO 11988), amended January 29, 2015, and as implemented in 44 CFR Part 9, requires federal agencies to “avoid to the extent possible the long- and short-term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct or indirect support of floodplain development wherever there is a practicable alternative.” The 100- year floodplain is the area covered by water in the event of a 100-year flood, which is a flood that has a 1 percent annual chance of being equaled or exceeded in magnitude in any given year. The 500-year floodplain is the area covered by water in the event of a 500-year flood, which is a flood that has a 0.2 percent annual chance of being equaled or exceeded in magnitude in any given year. The 100- and 500-year floodplains are mapped on FEMA Flood Insurance Rate Maps (FIRMs). The VE zone is the coastal area subject to a velocity hazard (wave action) where BFEs are provided. The VE zones as well as the 100- and 500-year floodplains are mapped on FEMA Flood Insurance Rate Map.

Based on the current FEMA FIRMs that covers the City of Springfield, only three of the damaged facility locations, all recreational facilities, occur within a flood zone (Appendix B). The proposed relocation site (preferred alternative) is identified on the FEMA FIRM as being within Flood Zone X (un-shaded), which is defined as an area of minimal flood risk. The location of the stormwater retention ponds, however fall within a shaded X flood zone.

#### **5.3.2.1. Alternative 1: No Action Alternative**

Under the No Action Alternative, the City of Springfield would not rebuild nor relocate their municipal facilities. Alternative 1 would not involve any construction activities, therefore there would be no impacts to floodplains.

**5.3.2.2. Alternative 2: Replacement of the Municipal Facilities at the Original Locations**

Under Alternative 2, the demolition and reconstruction of the city facilities at their current locations would increase the useful life of the facilities. Most of these facilities are located outside of both the 100-year and 500-year floodplain, therefore no short-term or long-term effects on the floodplain at these locations would be anticipated. The Walking Park, however, features two ponds that falls within flood zone A. In addition, the western edge of Sports Complex occurs within a flood zone A and AE. The floating boat dock, by definition, is located in a flood zone. Since these non-critical facilities will be repaired to their pre-disaster condition within their original footprints, there will be no short or long-term adverse effects to the floodplain. Additionally, they provide open space use of the floodplain and support recreational activities for the community. Based on the review conducted, Alternative 2 would have no adverse impact on the floodplain.

**5.3.2.3. Alternative 3: Construction of the new City Complex at an Alternate Location (Preferred Alternative)**

Under Alternative 3, the relocation and construction of the City Complex would increase the useful life of the facilities. The proposed location of the structures is outside of both the 100-year and 500-year floodplain, therefore no short-term or long-term effects on the floodplain at this location would be anticipated. The ponds, however, are located within the 100-year floodplain. The ponds would serve to reduce the flood risk to the upland areas of the existing flood zone, including improved property and upland habitat. They would include an approximate volume of 301,194 cubic feet (CF), capable of impounding 3.0265 acres per foot of stormwater, which would ensure the pond will not be overwhelmed by storm events greater than the 25-year requirement. The ponds would ensure post development runoff rates do not exceed the pre-development runoff rates due to increased hardscapes from the construction of the City Complex.

The project will maintain the function of the floodplain in this location as a viable drainage area during flooding events. An 8-step checklist, as required by 44 CFR Part 9 (Appendix C), has been completed for this alternative. Due to the increase in stormwater capacity, Alternative 3 would have minor beneficial impacts on the floodplain. According to the local floodplain administrator, an Environmental Resource Permit (ERP) from the Northwest Florida Water Management District is the only permit required for the construction of the stormwater pond and no additional permits will be required for the proposed project.

**5.3.3. Executive Order 11990 (EO 11990) Wetlands**

Executive Order 11990, Protection of Wetlands (EO 11990), requires federal agencies to avoid, to the extent possible, the long- and short-term adverse impacts associated with the destruction or modification of wetlands and to avoid direct or indirect support of new construction in wetlands



wherever there is a practicable alternative. The criteria for the determination are if the project could have a possible adverse effect associated with constructing in or near wetlands. Information about the wetlands potentially affected by the proposed project was gathered from USFWS National Wetlands Inventory (NWI) Web Map Services, accessed on November 13, 2023.

#### **5.3.3.1 Alternative 1: No Action Alternative**

Under the No Action Alternative, the City of Springfield would not rebuild nor relocate their municipal facilities. Alternative 1 would not involve any construction activities, therefore there would be no impacts to the adjacent wetland.

#### **5.3.3.2 Alternative 2: Replacement of the Municipal Facilities at the Original Locations**

Under Alternative 2, the demolition and reconstruction of the existing city facilities at their original locations is generally located outside of wetlands with three exceptions. The floating boat dock is located in open water and may require coordination with the USACE for permitting. However, the dock is functionally dependent on its location within the wetland, and it provides open space use and recreational value to the community. The Springfield Gardens Walking Park encompasses two freshwater ponds that would not be impacted during repairs to the park. A portion of the Springfield Sports Complex occurs across a wetland, but recent aerial imagery and photos (best available data) shows that the land has been leveled and developed. It no longer has wetland characteristics as it is now included within an athletic field and a parking lot. In addition, the projects would include repairs of the facilities to pre-disaster form, function, and footprint, which is not likely to affect wetlands.

#### **5.3.3.3 Alternative 3: Construction of the New City Complex at an Alternate Location (Preferred Alternative)**

According to the map in Appendix B, the proposed location of the new city complex under Alternative 3 is located adjacent to a designated Freshwater Forested/Shrub Wetland, which overlaps the location of the proposed Phase I stormwater retention pond associated with the complex. A larger phase II stormwater retention pond is planned to be constructed at the completion of the City Complex construction phase and will also crosscut the designated Freshwater Forested/Shrub Wetland. The construction of two phases of stormwater retention ponds would create new areas for surface water storage. These ponds would prevent untreated stormwater runoff from draining directly into the wetland west of the project location. The scope of work for the Phase I pond would include clearing and grubbing, excavation, installation of three inlet drainage pipes tied to the stormwater drainage system of the adjacent City Complex, an outfall control structure with 24 in. discharge pipe encased in a 7 ft. wide spreader swale, and construction of a surrounding 4 ft tall berm. The Phase

I pond would measure less than one acre in size. The Phase II Pond would include clearing and grubbing, excavation, installation of two inlet drainage pipes tied to the stormwater drainage system of the adjacent City Complex, an outfall control structure, and construction of a surrounding 4 ft berm. The phase II pond would measure 6.77 acres in size. Stormwater would be managed by diverting water from the roof of the proposed City Complex by downspouts to underground piping to the proposed retention ponds. Paving and sitework would also be graded to flow towards the built swells and ponds. The location of the two phases of ponds bisects a portion of a Freshwater/Shrub wetland and would cause permanent impacts to approximately 15% of the surrounding wetland from ground disturbance and soil displacement.

The wetland is not identified as being under USACE jurisdiction per the 404 Mapper accessed on November 20, 2023. However, the construction would require permitting from FDEP or the Northwest Florida Water Management District (NFWFMD) through the Florida Environmental Resource Permitting (ERP) program. Appropriate BMPs and engineering controls would be implemented during construction to prevent and minimize indirect erosion, sedimentation, and pollution impacts to the remaining wetlands that extend across the tract and into the surrounding area. These measures would be identified in the ERP and in the SWPPP. The ERP Permit #IND-005-305567-1 has already been issued for the Phase I pond (30.168142, -85.609300) (Appendix D); the permit for the Phase II Pond (30.16613, -85.60975) would be obtained prior to its construction.

Short-term impacts due to construction activities would be minimized by implementing best management practices, including the use of silt fencing. In addition, minor, long-term impacts would occur due to new ground disturbance for the newly constructed Phase I pond and the later Phase II Pond across portions of the wetland. Instead of a vegetated palustrine wetland dominated by trees and shrubs and seasonal saturation, approximately 8 acres of the wetland would be converted into an open palustrine pond with limited vegetation surrounded by a 4ft tall berm. Although this would change the character of the wetland in this location, the remaining portions of the 54-acre wetland would remain intact and allow for the continued existence of this habitat. In addition, the ponds would introduce a habitat of open water that does not currently occur in this location. Open water would encourage use from wading birds and other species of plants and animal. Long-term beneficial impacts would occur as the ponds would improve water quality of stormwater runoff deposited in the wetland. An 8-step checklist (Appendix C), as required by 44 CFR Part 9, has been completed for Alternative 3 (Preferred Alternative). Based on the analysis conducted, Alternative 3 would have minor impacts on the wetland from construction activities and reduction of wetland, and minor beneficial impact from the repurpose of wetlands for improved water quality and species habitat.

## **5.4. Coastal Resources**

### **5.4.1. Coastal Zone Management Act (CZMA)**

The CZMA provides for the management of the nation's coastal resources. The CZMA defines the coastal zones where development must be managed to protect areas of natural resources unique to coastal regions. States are required to define the area that will comprise coastal zone and develop management plans that will protect these unique resources through enforceable policies of state coastal zone management programs. As defined in the Act, the coastal zone includes coastal waters extending to the outer limit of state submerged land title and ownership, adjacent shorelines, and land extending inward to the extent necessary to control shorelines. Federal as well as local actions must be determined to be consistent with the coastal zone management plans and policies before they can proceed.

#### **5.4.1.1. Alternative 1: No Action Alternative**

Under the No Action Alternative, the City of Springfield would not rebuild nor relocate their municipal facilities. Alternative 1 would not involve any construction activities, therefore there would be no impact to the coastal zone.

#### **5.4.1.2. Alternative 2: Replacement of the Municipal Facilities at the Original Locations**

Under Alternative 2, construction would occur in the coastal zone; however, the areas are not located along to coast except for the Cherry Street floating dock. For the repair of the floating dock, the subrecipient is responsible for obtaining any required FDEP ERP permits/waivers. Compliance with FDEP requirements constitutes a consistency review for Bay County. For the remaining project replacements, there would be no impact to coastal resources.

#### **5.4.1.3. Alternative 3: Construction of the New City Complex at an Alternate Location (Preferred Alternative)**

Under Alternative 3, the relocation and construction of City Complex would not be along the coast. Therefore, there would be no impact to coastal resources.

## **5.5. Biological Resources**

### **5.5.1. Fish & Wildlife Resources**

Springfield is located in the Coastal Plain Province on the Talbot Terrace underlain by sandy soils. According to the Florida Natural Areas Inventory, the proposed location of the new City Complex can be described as a Mesic Pine Flatwood ecological community. It is characterized by an open

canopy of tall pines, mainly Longleaf pine, and a dense, low ground layer of low shrubs, grasses, and forbs. This ecological community characterizes much of Florida and can host many rare plants and animal species. The wetland area is characteristic of a Baygall ecological community described as an evergreen forested wetland at the base of a slope or in a depression with soils composed largely of peat. These areas feature an overstory comprised of a variety of bay trees, loblolly and slash pine, and sweetgum with an understory of fetterbush, gallberry, dahoon species, wax myrtle among others. The forested baygalls can provide habitat for the Florida black bear.

The upland portion of the proposed new City Complex location includes multiple cleared parcels that were once a tree cutting service, a commercial plant nursery, and an open undeveloped grassland. The associated stormwater pond location is an undeveloped parcel of land currently covered in scrub following Hurricane Michael, which destroyed the overstory of tall trees. The proposed complex would be located along two major roadways in Springfield, including Transmitter Road and 11<sup>th</sup> Street. With the exception of the proposed location of the stormwater pond, the parcels provide low quality habitat for wildlife based on the type and amount of vegetation they contain.

#### **5.5.1.1. Alternative 1: No Action Alternative**

Under the No Action Alternative, the City of Springfield would not rebuild nor relocate their municipal facilities. Alternative 1 would not involve any construction activities, therefore there would be no direct impact to wildlife or fish populations.

#### **5.5.1.2. Alternative 2: Replacement of Municipal Facilities at their Original Locations**

Under Alternative 2, the reconstruction of the existing municipal facilities at their original locations would not result in the loss of any vegetated habitat, due to their repair to pre-disaster condition within their original footprints. In addition, the locations are surrounded by parcels that have been substantially developed. Except for the floating dock location, the areas are not considered preferred wildlife habitat, and wildlife usage is expected to be limited to species adapted to urban settings. The installation of a new floating dock, tethered by a pipe at the end of a gangway, would have minor short-term impacts to fish and wildlife species as the construction activities may temporarily disrupt their normal behavior. Noise generated during all construction activities may temporarily disturb wildlife not adapted to urban settings; however, any disturbance experienced by wildlife would be limited to the construction period and would be limited to daylight hours. Avian species may be deterred by the construction activities from foraging in or near the project areas. After construction, however, these species are expected to return to their normal behavior. Based on the review conducted, Alternative 2 would have negligible impacts to fish and wildlife.

### **5.5.1.3. Alternative 3: Construction of the New City Complex at an Alternate Location (Preferred Alternative)**

Alternative 3 would have minor long-term impacts on fish and wildlife due to the loss or conversion of approximately sixteen acres of vegetated habitat. The area occupied by the structures and parking lot would be converted from a disturbed grass pasture to hard surfaces. The stormwater pond would be converted from a vegetated palustrine wetland dominated by trees and shrubs with seasonal saturation to an open palustrine pond with limited vegetation. The alteration of the wetland would change the types of animals likely to utilize the area in favor of fish, amphibians, and wading birds. Despite these changes, the remaining portions of the 54-acre wetland adjacent to the stormwater pond would remain intact and allow for the continued use of this habitat by the displaced wildlife. In addition, the wet pond would allow for a greater diversity of wildlife to utilize the tract. Long-term beneficial impacts are expected as the pond would improve water quality of stormwater runoff deposited in the wetland.

Noise generated during construction on site may temporarily disturb wildlife. However, any disturbance experienced would be limited to the construction period during daylight hours. Thus, minor short-term negative impacts are anticipated as a result of the construction of the new City Complex in the new proposed location as species will be pushed out of the construction area into the adjacent palustrine wetland. Conversely, minor positive long-term impacts are anticipated due to an increase in habitat diversity. Based on the review conducted, Alternative 3 would have minor impacts to fish and wildlife.

### **5.5.2. Vegetation**

Vegetation is the biological foundation of terrestrial ecosystems and is highly influenced by environmental factors, such as soil texture, depth, and landform type. It is important for the health of environments and biodiversity, as vegetation provides habitat for a wealth of organisms, including threatened and endangered species. Minimal vegetation exists in the upland portions of the proposed city complex due to it being previously cleared and partially developed, with most of the vegetation consisting of maintained landscaping and pasture grasses. In contrast, the location of the proposed stormwater pond consists of a vegetated palustrine wetland dominated by trees and shrubs with seasonal saturation.

#### **5.5.2.1. Alternative 1: No Action Alternative**

Under the No Action Alternative, the City of Springfield would not rebuild nor relocate their municipal facilities. Alternative 1 would not involve any construction activities, therefore there would be no impact to vegetation.

#### **5.5.2.2. Alternative 2: Replacement of Municipal Facilities at their Original Locations**

Under Alternative 2, reconstruction of the municipal facilities at their original locations would result in minimal removal of any vegetation as the locations are already substantially commercially developed. Minimal natural habitat is present within the vicinity of the parcels that have been previously altered by human activities. Construction activities would predominantly take place within maintained and previously disturbed areas. Based on the review conducted, Alternative 2 would have a negligible impact on vegetation.

#### **5.5.2.3. Alternative 3: Construction of the New City Complex at an Alternate Location (Preferred Alternative)**

Under Alternative 3, the replacement of the City Complex would disturb approximately sixteen acres of existing vegetation and soil during grading, paving, and construction of the new facility. The upland portion of the tract is best classified by the FNAI as Mesic Pine Flatwood, the most widespread natural community found in Florida. Currently, however, the area is comprised of cleared parcels once containing a commercial plant nursery with associated facilities, a tree removal service, and an undeveloped grass field. The ecosystem present at the location has been disturbed by urban use with no natural vegetational communities remaining. In contrast, the location of the stormwater pond would best be classified by the FNAI as Baygall, a freshwater forested wetland. This area will be converted from a vegetated palustrine wetland dominated by trees and shrubs to an open palustrine pond with limited vegetation. The wetland that would be impacted is only 15% a portion of a larger 54-acre wetland, and the remainder of the wetland would remain intact. Additionally, the wetland composition had already been disturbed by the hurricane impacts. Therefore, based on the review conducted, Alternative 3 would have a minor long-term impact on vegetation.

#### **5.5.3. Threatened and Endangered Species**

The Endangered Species Act (ESA) of 1973 provides for the conservation of threatened and endangered plants and animals and the habitats in which they are found. The lead Federal agencies for implementing ESA are the U.S. Fish & Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS). As relevant to the proposed action, the USFWS has regulatory authority for species occurring on land within the project area. The law requires federal agencies to ensure that actions they authorize, fund, or carry out are not likely to jeopardize the continued existence of any listed species or result in the destruction or adverse modification of designated critical habitat of such species. The law also prohibits any action that causes a “take” of any listed species of endangered fish or wildlife. A “take” includes the following actions: “harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to engage in any such conduct.”

#### **5.5.3.1. Alternative 1: No Action Alternative**

Under the No Action Alternative, the City of Springfield would not rebuild nor relocate their municipal facilities. Alternative 1 would not involve any construction activities, therefore there would be no impact to threatened or endangered species.

#### **5.5.3.2. Alternative 2: Replacement of the Municipal Facilities at the Original Locations**

Under Alternative 2, the demolition and reconstruction of the original municipal facilities at their original locations would not result in any impacts to any species protected under ESA. All ESA listed species included in the IPaC-generated list for this alternative were removed from consideration of potential effects due to lack of suitable habitat, as the original sites are highly urbanized and contain low quality habitat. The sites also lack any potential freshwater or saltwater resources except for the location of the floating dock. As the dock will be limited to the surface of the water and on land, no habitat for any aquatic species will be impacted at the site. Based on the analysis conducted, FEMA has determined that Alternative 2 may affect, not likely to adversely affect (MANLAA) any ESA-listed species as a result of Alternative 2.

#### **5.5.3.3. Alternative 3: Construction of the New City Complex at an Alternate Location (Preferred Alternative)**

In accordance with Section 7 of the Endangered Species Act (ESA) of 1973, Alternative 3 was evaluated for the potential impact to federally listed threatened and endangered animal species that may be present in the project area identified by accessing the USFWS IPaC database on January 25, 2024. According to this report, the threatened faunal species likely to occur in the project areas are the Eastern Black Rail (*Laterallus jamaicensis*), Eastern Indigo Snake (*Drymarchon couperi*), and Panama City Crayfish (*Procambarus econfinae*) (Appendix E). However, the Eastern Black Rail is a transient species that can easily move to other areas not being developed. The Eastern Indigo Snake prefers to inhabit xeric upland communities with longleaf pine, turkey oak, and wiregrass and per previous conversations with USFWS Biologist is only expected to inhabit northern Santa Rosa County, and the Apalachicola Bluffs and Ravines Preserve in Liberty County. Additionally, according to the FNAI report, the Eastern Indigo Snake has not been documented either currently or historically in this area. These species are not known to actually occur within the project vicinity but are listed due only to falling within the known or predicted range of the species due to the environmental variables that are present. Furthermore, their preferred habitat is not found within the project area. Similarly, the Panama City Crayfish is not known to exist in the area, but they are listed as likely present in the FNAI report. The project location is not within designated critical habitat for any of the species identified in the IPaC report.

According to the IPaC report, three threatened flowering plants are also listed for the project area, including Godfrey's Butterwort (*Pinguicula ionantha*), Telephus Spurge (*Euphorbia telephoides*), and White Birds-in-a-nest (*Macbridea alba*) (Appendix E). When compared to the Florida Natural Areas Inventory Biodiversity Matrix (FNAI) report, however, only the Godfrey's Butterwort and White Birds-in-a-nest are listed. According to the FNAI report, neither have been documented either currently or historically. They are not known to actually occur within the vicinity but are listed due only to falling within the known or predicted range of the species due to the environmental variables that are present. In addition, the project location is not within designated critical habitat for any of the species.

An ecological site assessment for the proposed City Complex was performed by Cypress Environmental of Panama City in April 2020 for the proposed project area, excluding the northern 1.15-acre lot which was purchased after the study was completed (Womack 2020) (Appendix F). The assessment included a review of available regulatory agency records, other available environmental information, and visual field inspection. The authors identified only two threatened and endangered species plant or animal species as potentially present within the proposed project area, including the Eastern indigo snake and the Panama City crayfish. However, no burrows that could be utilized as habitat by the Eastern indigo snake were identified during their fieldwork, which indicates a low likelihood of the presence of the snake in the project area. In addition, their fieldwork did not result in the identification of evidence of any Panama City crayfish within or near the project area (Womack 2020).

All ESA-listed species included in the IPaC-generated list for this alternative were removed from consideration of potential effects due to lack of suitable habitat at the proposed site as noted above. The proposed new City Complex facility is located on cleared parcels consisting of a former commercial plant nursery with corresponding facilities, a tree service business, and a grass field. The parcels provide a low-quality terrestrial habitat. The wooded parcel to the west has been heavily damaged by Hurricane Michael which destroyed the overstory of tall trees. The area is included in a 54-acre wetland that extends to the west and north. In addition, none of the species were noted during the fieldwork conducted by Cypress Environmental. Since no suitable habitat is present within the Alternative 3 project footprint for any listed species, FEMA determined there is no effect to any ESA-listed species. Based on the analysis conducted, Alternative 3 would have no impact to threatened and endangered species.

#### **5.5.4. Migratory Bird Treaty Act**

The Migratory Bird Treaty Act (MBTA) of 1918 provides a program for the conservation of migratory birds that fly through lands of the United States. The lead Federal agency for implementing the MBTA is the USFWS. The law requires Federal agencies to ensure that actions they authorize, fund, or carry out are not likely to jeopardize the continued existence of any migratory birds or result in the destruction or adverse modification of designated critical habitat of



such species. The law makes it illegal for anyone to “take,” possess, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or their parts, feathers, nests, or eggs of any such bird, or any product, whether or not manufactured, which consists, or is composed in whole or part, of any such bird or any part, nest, or eggs. “Take” is defined as “to pursue, hunt, shoot, wound, kill, trap, capture, or collect, or any attempt to carry out these activities.”

The entire state of Florida is considered a flyway zone for migratory birds.

#### **5.5.4.1. Alternative 1: No Action Alternative**

Under the No Action Alternative, the City of Springfield would not rebuild nor relocate their municipal facilities. Alternative 1 would not involve any construction activities, therefore there would be no potential for effects and a “take” would not occur since there would be no destruction or adverse modification of the surrounding habitat.

#### **5.5.4.2. Alternative 2: Replacement of the Municipal Facilities at the Original Locations**

Under Alternative 2, minor short-term impacts to species within the project areas could potentially occur due increased human disturbance, and noise. However, there is already an established level of human presence and activity in the area, so wildlife would likely be acclimated to low levels of disturbance. Migratory bird species are highly mobile and are thus unlikely to be impacted by project activities. In addition, the project areas were previously developed and are not suitable for nesting habitat, are not optimal for foraging, and are not located within a designated critical habitat, therefore take of a migratory bird species is not anticipated with this alternative.

#### **5.5.4.3. Alternative 3: Construction of the New City Complex at an Alternate Location (Preferred Alternative)**

According to the USFWS IPaC database, accessed on June 27, 2023, approximately twelve migratory bird species were identified as being potentially present within the project areas with a varying range for probability of presence within the project vicinity. Under Alternative 3, minor short-term impacts to species within the project area could potentially occur due to construction activities. The upland portion of the project area is not ideal nesting habitat due to the lack of trees and vegetation and is not optimal for foraging. The 8-acre wetland portion of the project area experienced heavy damage to the mature trees that previously covered the tract due to Hurricane Michael, resulting in significant loss of nesting habit. The proposed scope of work would have a short-term impact on migratory birds during construction due to the clearing of vegetation, increased human disturbance, and noise. However, there is already an established level of human presence and activity in the area, so wildlife would likely be acclimated to low levels of

disturbance. Migratory bird species are highly mobile and are thus unlikely to be impacted by project activities. In the long term, the construction of the open wet stormwater pond would have a beneficial effect to migratory birds due to new habitat available for foraging activities by wading birds such as the Lesser Yellowlegs (*Tringa flavipes*), the Willet (*Tringa semipalmata*), and the Ruddy Turnstone (*Arenaria interpres morinella*). The remaining migratory bird species could utilize the adjacent portions of the 54-acre wetland that exist to the north and west of the proposed stormwater pond for foraging and nesting. None of the project area is located within a designated critical habitat, therefore take of a migratory bird species is not anticipated with this alternative.

## **5.6. Cultural Resources**

As a Federal agency, FEMA must consider the potential effects of its actions upon cultural resources prior to engaging in any undertaking. Cultural resources include historic architectural properties (buildings, structures, and objects), prehistoric and historic archaeological sites, historic districts, designed landscapes, and traditional cultural properties. The primary federal authorities that apply to cultural resources are NEPA and Section 106 of the National Historic Preservation Act (NHPA). Cultural resources are specifically included under one of the mandates of NEPA: to “preserve important historic, cultural, and natural aspects of our national heritage....” (42 USC 4331). The implementing regulation for the NHPA is the Protection of Historic Properties (36 CFR 800), which defines historic properties as any prehistoric or historic district, site, building, structure, or object that is included in, or eligible for inclusion in, the National Register of Historic Places (NRHP) (36 CFR. 800.16). Under the NHPA, a property possesses significance if it meets the NRHP criteria listed in 36 CFR 60.4 and retains sufficient integrity to convey that significance. Generally, properties must be at least 50 years old to be eligible for the NRHP, unless they are proven to have exceptional importance.

The threshold level for significant impacts to cultural resources under NHPA would be those impacts that adversely affect any historic property that is eligible for or listed in the NRHP under Section 106 or has been identified by a federally recognized tribe as a sacred site or traditional cultural property.

### **5.6.1. Alternative 1: No Action Alternative**

Alternative 1 would not involve any construction activities and no federal undertaking would occur, therefore, there would be no impact to cultural resources or further responsibility under Section 106 of the NHPA.

### **5.6.2. Alternative 2: Replacement of the Municipal Facilities at the Original Locations**

The original municipal structures were demolished with funding from the insurance company following Hurricane Michael due to the extent of damage that resulted in unsafe conditions. The Alternative 2 projects would take place largely in the original footprints with little new ground disturbance. Consultation with the State Historic Preservation Officer (SHPO) may be required for the construction of the replacement facilities, which will likely require updates for codes and standards. The areas are highly built-up and are unlikely to have intact in-situ archaeological deposits. FEMA would recommend a finding of No Historic Properties Affected with the condition that in the event that an inadvertent discovery is found, the applicant would stop all work and notify FEMA and SHPO.

### **5.6.3. Alternative 3: Construction of the New City Complex at an Alternate Location (Preferred Alternative)**

The construction activities associated with Alternative 3 would require new ground disturbance of approximately sixteen acres. FEMA, the Florida State Historic Preservation Office (SHPO), the Florida Division of Emergency Management, the Alabama Coushatta Tribe of Texas, Choctaw Nation of Oklahoma, the Mississippi Band of Choctaw Indians, and the Advisory Council on Historic Preservation have executed a Statewide Programmatic Agreement (PA) dated September 10, 2014, and the (3<sup>rd</sup>) Duration Amendment, effective September 1, 2023, to streamline the Section 106 review process. The construction of the City Complex does not meet any of the Programmatic Allowances outlined in the PA, which required FEMA to conduct consultation under the NHPA. The areas of potential effect (APEs) for cultural resources are limited to the areas within which all construction and ground-disturbing activities would be confined and the viewshed of the project areas. A literature review of the Florida Master Site File (FMSF) was conducted in November 2023. The literature review focused on the APEs and included a 0.25-mile buffer around the APEs. FEMA evaluated potential resources in the APE utilizing the National Park Service (NPS) NRHP GIS resource, the Florida Master Site File (FMSF), and previous cultural resource investigations. Four cultural resource investigation occurred within 0.25 miles of the APE; however, no historic resources were identified within the APE. In addition, none of the structures within the viewshed of the project area were determined eligible for the NRHP. FEMA submitted a consultation letter to the Florida SHPO on November 09, 2023, with a finding of No Historic Properties Affected. Concurrence from SHPO was received on December 12, 2023. In addition, ten federally recognized tribes were consulted, including the Alabama-Coushatta Tribe of Texas, Alabama-Quassarte Tribal Town, Choctaw Nation of Oklahoma, Jena Band of Choctaw Indians, Miccosukee Tribe of Indians, Mississippi Band of Choctaw Indians, Muscogee (Creek) Nation, Poarch Band of Creek Indians, Seminole Nation of Oklahoma, and the Seminole Tribe of Florida. The Choctaw Nation of Oklahoma responded with concurrence on December 8, 2023. No

other responses were received within the allotted timeframe. Refer to Section 7.0 for applicable project conditions addressing NHPA compliance.

## 5.7. Socioeconomic Resources

### 5.7.1.1. Land Use and Planning

The project areas consist of the locations of the original municipal facilities and the proposed new City Complex location. The original locations consist of developed parcels, surrounded by other municipal facilities, residential homes, commercial buildings, and railroads. The original sites also have existing asphalt paved roads, rights-of-ways, and parking lots for access to the facilities, see Table 5.3 for details. The proposed location for the new City Complex is a mix of several lots that include two cleared, previously developed parcels, two undeveloped grass parcels, and a large, wooded wetland parcel covered in shrubs. The new City Complex location at the corner of E. 11th Street and Transmitter Road is along two main corridors through the City of Springfield. There are both existing residential and commercial properties adjacent to the proposed location.

**Table 5.3. List of the original project locations and a description of the tracts**

PN	Facility	Location	Coordinates	Tract Description
77072	City Hall and Police Station	3529 3 <sup>rd</sup> St	30.15337, -85.61499	formerly developed tract covered largely in asphalt
77074	Fire Department	3726 East 3 <sup>rd</sup> St	30.15271, -85.61068	formerly developed tract covered largely in concrete and asphalt
77075	Community Building	3728 East 3 <sup>rd</sup> St	30.15238, -85.61028	developed tract covered largely in concrete and asphalt
78280	Parks and Sports Complex	Corner of Bayou Ave. and Cherry St; 4901 Sports Ln; 3728 East 3 <sup>rd</sup> St; Corner of East 7 <sup>th</sup> St & Transmitter Rd; 301 Kilbourn Ave	30.14578, -85.60826 30.15536, -85.60074 30.15199, -85.61049 30.15972, -85.60734 30.15376, -85.6142	boat ramp - developed tract covered largely in concrete; sports complex - grassy field featuring ball fields, concessions stand/bathrooms, walking path, and a parking lot; Buddy McLemore Park - developed football field and open grass field; Springfield Gardens Walking Park - grass field featuring walking trails surrounding two ponds and dirt parking areas with an overstory of small hardwoods and palm trees; Henry Brooks Park - grassy tract with an overstory of hardwoods that features three oval-shaped walking tracks
78288	Fire Department Sub-station	2533 Transmitter Rd	30.19389, -85.60856 30.19412, -85.60846	formerly developed tract covered largely in grass with a gravel access road and parking area that has recently been used as a work area for storing soil and fill material

PN	Facility	Location	Coordinates	Tract Description
80425	Shaw Buildings #1-4	162 Detroit Ave	30.14965, -85.60860 30.14648, -85.60860 30.14967, -85.60900 30.14944, -85.60894 30.14957, -85.60834	formerly developed tract with grass and an overstory of hardwoods
80427	Vehicle Maintenance Shop & Wash Bay	3500 East 4 <sup>th</sup> St	30.15466, -85.61547 30.15468, -85.61520	developed tract covered largely in concrete
80460	Purchasing and Public Works Warehouse	3535 East 4 <sup>th</sup> St; 3509 East 4 <sup>th</sup> St	30.15524, -85.61423 30.15587, -85.61441 30.15534, -85.61513 30.15558, -85.61540 30.15497, -85.61577	developed tract featuring several utility structures and dirt access roads dispersed with grass and a sparse overstory of hardwoods

**5.7.1.2. Alternative 1: No Action Alternative**

Under the No Action Alternative, the City of Springfield would not rebuild nor relocate their municipal facilities. Alternative 1 would not involve any construction activities, therefore there would be no alteration of the current land use.

**5.7.1.3. Alternative 2: Replacement of the Municipal Facilities at the Original Locations**

Under Alternative 2, the demolition and reconstruction of the municipal facilities at their original locations would not result in changes in the project footprints, and therefore, would not adversely affect the land use within or adjacent to the project areas. Therefore, Alternative 2 would have no impact on current land use.

**5.7.1.4. Alternative 3: Construction of the New City Complex at an Alternate Location (Preferred Alternative)**

The preferred alternative project would occur in an area currently zoned as Undesignated but owned by the City of Springfield since March 2018 in anticipation of the proposed development. The zoning designation for the properties surrounding the proposed location is a combination of mixed use, commercial, recreational, and residential. The northern portion of the proposed location previously had commercial uses. Additional commercial properties exist immediately to the north of the tract. Single and multi-family residential structures exist to the east, across Transmitter Road. A gas station, laundry business, and a new small commercial strip mall exist at the intersection of Transmitter Road and 15<sup>th</sup> Street. Single family residences, an auto repair shop and a church exist across 15th Street from the proposed City Complex. Additional commercial properties exist immediately to the west of the tract. Therefore, the construction of the City Complex would not disrupt the land use in this area.

Under Alternative 3, the relocation and construction of the new City Complex would change the use of the currently vacant parcels. The project would result in the development of approximately eight acres of cleared, vacant parcels and eight acres of undeveloped wetlands. Although substantial new ground disturbance would occur, approximately half of the project area has been previously cleared and consists of grassland and small shrubs. Removing this vegetation for the relocation of the City Complex to this location is not anticipated to adversely affect the land use within or adjacent to the project area. The western parcel consists predominantly of wetland and will be used for the location of a stormwater pond. Thus, it will continue to serve as part of the drainage system for the area and not substantially change the function of the parcel. The City Complex is anticipated to bring more traffic to the area, but since it is located along two major city roads and centralized within the city limits of Springfield, it is considered to be in an appropriate location. Therefore, Alternative 3 would have a minor impact on current land use.

### **5.7.2. Transportation**

The City of Springfield's original municipal facilities are generally located along asphalt-paved roadways near the center of the commercial area of the city. The facilities include parking and multiple access points. The proposed location of the new City Complex is located at the intersection of E. 11<sup>th</sup> St and Transmitter Road, two main thoroughfares through the City of Springfield. This area is located approximately a mile further north than the damaged municipal locations and provides centralized access to the citizens of the City of Springfield.

#### **5.7.2.1. Alternative 1: No Action Alternative**

Alternative 1 would not involve any construction activities, therefore, no impacts on existing infrastructure or transportation would occur within the project area.

#### **5.7.2.2. Alternative 2: Replacement of the Municipal Facilities at the Original Locations**

Under Alternative 2, the demolition and reconstruction of the existing municipal facilities at their current locations would occur. Due to the reconstruction of the facilities within their original footprints, no change in the nearby and adjacent roadways would be expected. Traffic interruptions would be intermittent, localized, and temporary and limited to the construction period. During active construction periods, construction workers would direct traffic through and around the construction areas, as needed. Additionally, construction vehicles may generate an increase in traffic to the areas; this increase is anticipated to be short-term and limited to the duration of the construction period. Alternative 2 would not add or remove sources of vehicle traffic outside the construction period, therefore, this alternative would have no effect on long-term traffic levels in the area. Based on the review conducted, Alternative 2 is expected to have a minor short-term impact on transportation and traffic.

**5.7.2.3. Alternative 3: Construction of the New City Complex at an Alternate Location (Preferred Alternative)**

Under Alternative 3, the relocation and construction of the City Complex would occur. The proposed project accesses would occur along both E. 11<sup>th</sup> Street and Transmitter Road. Both roads are classified as urban major collectors. No significant adverse impacts on transportation, site access, or traffic levels are anticipated. There would be a minor temporary increase in the volume of construction traffic on roads in the immediate vicinity of the proposed project site that could potentially result in a slower traffic flow during the duration of the construction phase. To mitigate potential delays, construction vehicles and equipment would be stored on site during project construction and appropriate signage would be posted on affected roadways. The construction contractor would be required to establish staging areas away from high traffic areas or within the limits of the project site. Once the City Complex is complete, there would be a slight increase in traffic volumes in this part of the city.

**5.7.3. Environmental Justice (EO 12898)**

EO 12898, Federal Actions to Address Environmental Justice in Minority and Low-Income Populations, directs federal agencies to address and avoid disproportionate environmental and human health impacts from federal actions on minority and low-income populations. All federal agencies must analyze the environmental effects, including human health, social, and economic effects, on minority and low-income communities. The impacted area includes all areas of the scope of work for the proposed project, any staging areas or hauling routes, and any areas outside of the immediate project area that may be impacted indirectly or directly by the proposed project.

In January 2021, President Biden issued EO 13985, Executive Order on Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce, and EO 14008, Tackling the Climate Crisis at Home and Abroad, to further address the need to achieve environmental justice and equity across the federal government. These new executive orders direct federal agencies to renew their energy, effort, resources, and attention to implement environmental justice and underscore the administration's commitment to environmental justice. Guidelines for the protection of children are specified in EO 13045, Protection of Children from Environmental Health Risks and Safety Risk (Federal Register, Volume, 62, Number 78, April 23, 1997). This EO requires that federal agencies make it a high priority to identify and assess policies, programs, and standards addressing disproportionate adverse risks to children resulting from environmental health or safety risks.

Under EO 12898, demographic information is used to determine whether minority or low-income populations are present within the areas potentially affected by the range of project alternatives. If so, a determination must be made whether implementation of the project alternatives may cause disproportionately high and adverse human health or environmental impacts on those populations.

The U.S. Census Bureau estimated the population of the City of Springfield to be 8,025 in 2021. Minority populations including African American, American Indian, Alaska Native, Asian, Native Hawaiian and Other Pacific Islander alone, Hispanic or Latino, or some other race, or a mix of these races, account for approximately 33.8% of the population in the City of Springfield. Persons identified within poverty level in the city account for 20.6% of the population.

The project includes the location of the damaged municipal facilities and the proposed City Complex. Environmental justice analysis requires using demographic data; therefore, the study area for the environmental justice analysis includes service areas of the different public servicing facilities, which covers the entire area within the City of Springfield's municipal boundary. The study area represents the area where project-related impacts would occur, potentially causing disproportionately high and adverse effect on neighboring minority and low-income populations. For the purposes of this analysis, environmental justice populations are identified using socioeconomic indicators and Environmental Justice Indexes. Demographic indicators are the percent of minority or low-income populations which are compared to the next larger geographic unit.

In accordance with the FEMA EO 12898 Environmental Justice: Interim Guidance for FEMA EHP Reviewers (dated September 2023), environmental justice populations are defined by socioeconomic indicators using the following criteria:

- A minority population exists if the People of Color Population equals or exceeds the 50th percentile compared to the state average where the affected environment is located.
- A low-income population exists if the Low-Income Population equals or exceeds the 50th percentile compared to the state average where the affected environment is located.

EPA defines minority populations (people of color) as individuals who list their racial status as a race other than white alone and/or list their ethnicity as Hispanic or Latino (all people other than non-Hispanic white-alone individuals). Low-income populations are measured as households with an income that is less than or equal to twice the federal poverty level.

Using Environmental Justice Indexes, environmental justice populations are defined as present if any of the following indexes equal or exceeds the 80th percentile compared to the average of the state where the affected environment is located:

- |   |   |
|---|---|
| - Particulate Matter 2.5 Micrometers and Smaller (PM 2.5) | - Toxic Release to Air                          |
| - Ozone   | - Traffic Proximity                             |
| - Diesel Particulate Matter                               | - Lead Paint                                    |
| - Air Toxics Cancer Risk                                  | - Superfund Proximity                           |
| - Respiratory Hazard Index                                | - Risk Management Plan (RMP) Facility Proximity |



- Hazardous Waste Proximity
- Wastewater Discharge
- Underground Storage Tanks

Table 5.4 and Table 5.5 depict the socioeconomic indicators and Environmental Justice Indexes for the study area (City of Springfield) and identify if environmental justice populations are present based on the criteria described above.

**Table 5.4 Environmental Justice Population Socioeconomic Indicators**

Socioeconomic Indicator	Study Area (percentile in state)	Environmental Justice Population Present
People of Color (percent)	46	No
Low-Income (percent)	73	Yes

**Table 5.5 Environmental Justice Indexes**

EJ Index	Index Percentile in State	Environmental Justice Population Present <sup>1</sup>
PM 2.5	77	No
Ozone	60	No
Diesel Particulate Matter	28	No
Air Toxics Cancer Risk	77	No
Air Toxics Respiratory	84	Yes
Toxic Release to Air	56	No
Traffic Proximity	49	No
Lead Paint	70	No
Superfund Proximity	68	No
RMP Facility Proximity	3	No
Hazardous Waste Proximity	69	No
Underground Storage Tanks	72	No
Wastewater Discharge	55	No

Source: EPA 2023

Notes:

<sup>1</sup> Index equals or exceeds the 80<sup>th</sup> percentile compared to the average of Florida State; therefore, an environmental justice population is present.

As shown in Table 5.4 and Table 5.5, the study area meets the criteria for containing environmental justice populations based on thresholds for low-income populations, and Respiratory Air Toxics.

The respiratory air toxics index for the City of Springfield exceeds 80th percentile when compared to the state. The increase is likely due to the proximity of the city to industries and ports along the Gulf Coast. Within Bay County, levels generally decrease with distance from the Gulf. Therefore, the proposed location of the City Complex is further removed from the effects of the industrial facilities along the Gulf than the locations of most of the city's damaged facilities. In addition, although the air toxics respiratory index is higher than the 80th percentile to state, the toxic release to air is well below the percentile and can provide a view of air quality within the area. The proposed action area is 1.75 miles away from industries that produce air toxins, which create a higher index and direct correlation to toxins being consumed that subsequently can affect respiratory inflammation.

#### **5.7.3.1. Alternative 1: No Action Alternative**

Under the no action alternative, low-income populations would remain affected at the same index levels. There would be no increase or decrease in environmental effects on this population. The City of Springfield would not rebuild nor relocate their municipal facilities. Municipal services would remain limited due to inadequate space within temporary structures or within structures not originally designed for those uses. In addition, response time by emergency responders would continue to be greater for citizens located in the northern portion of the City of Springfield.

#### **5.7.3.2. Alternative 2: Replacement of the Municipal Facilities at the Original Locations**

Alternative 2 would not directly change the number of residents in the local area. The current demographics, including number of persons living in housing, number of children attending schools, and demand for emergency services (medical, police, and firefighting) in the area would remain the same. The replacement of municipal facilities would involve rebuilding the municipal facilities in-kind to their pre-disaster conditions with upgrades for codes and standards. The facilities would be restored to their pre-disaster functions with little or no change to the existing design and footprint. The construction work under Alternative 2 would have a minor, short-term, beneficial impact on the local economy by providing temporary jobs but would have a negligible long-term impact on the total labor force and employment in the region due to the minimal number of jobs created by the reconstruction. Alternative 2 would not have a disproportionately high or adverse human health or environmental effects on low-income populations. Municipal services would remain limited due to inadequate space within the structures due to the growth of the population since the previous facilities were originally constructed. In addition, response time by emergency responders would continue to be greater for citizens located in the northern portion of the City of Springfield.

**5.7.3.3. Alternative 3: Construction of the New City Complex at an Alternate Location (Preferred Alternative)**

Alternative 3 would not directly change the number of residents in the local area. The current demographics, including number of persons living in housing, number of children attending schools, and demand for emergency services (medical, police, and firefighting) in the area would remain the same. The restoration activity would involve relocation and construction of a new City Complex approximately one mile north of the original locations of the facilities. This facility would replace the function of the damaged City Hall, Police Department, Fire Department, and Public Works and their associated satellite storage and training facilities. The proposed new location would have a minor impact by moving the City Hall/Police station to a less impoverished area (Table 5.6). This area of the city also has a lower population; however, it is more centrally located within the City’s current boundaries.

**Table 5.6 Low-income population of Damaged Facilities**

Facility	Low-Income Percentile in State
Proposed City Complex	71
City Hall and Police Station	80
Fire Station and Contents	78
Community Building	78
Shaw Bldgs. and Storage Unit	78
Vehicle Maintenance Shop and Wash Bay	80
Purchasing and Public Works Warehouses	80
Cherry St Boat Ramp	77
Park and Sports Complex Facilities	78
Fire Dept Sub-station	67

The City of Springfield has provided its citizens opportunity for input into the decisions to relocate the municipal facilities, to reuse the locations of some of the damaged facilities, and to delay the repair to most of the damaged recreational facilities (Table 5.6). The functions of the facilities will be moved to the City Complex or repaired over time as funding becomes available with the exception of the Cherry Street Boat Ramp. The city has not made a decision about repairing or replacing this facility.

**Table 5.7 Future Use of Damaged Facilities**

Facility	Location	Future of Facility	Future of Land
City Hall and Police Station	3529 3 <sup>rd</sup> St	City Complex	Community Center
Fire Station and Contents	3726 East Third St	City Complex	Unknown
Community Building	3728 East Third St	Rebuilt at previous location of City Hall and Police Station	Unknown
Fire Dept Sub-station	2533 Transmitter Rd	City Complex	Park
Shaw Bldgs. and Storage Unit	162 Detroit Ave	City Complex	Park
Vehicle Maintenance Shop and Wash Bay	3500 East 4th St	Repaired	Partially repaired with insurance money
Purchasing and Public Works Warehouses	3535 East 4th St; 3509 East 4th St	City Complex	Unknown
Cherry St Boat Ramp	Corner of Bayou Ave & Cherry St	Unknown	Unknown
Park and Sports Complex Facilities	4901 Sports Ln. 3728 East 3rd St. 301 Kilbourn Ave. Corner of East 7th St & Transmitter Rd.	Repaired	Repaired

Opportunity for public input occurred in multiple forms. The City holds public Commission meetings and workshops two to three times a month to discuss city issues such as annual budgets, city equipment needs, ordinances, zoning and lot divisions, and reports from various departments. During these meetings, the city presented the idea of moving the municipal facilities to a more centralized location with buildings large enough to accommodate the growing needs of the various city departments. These discussions led to the purchase of the property now planned for the new City Complex prior to Hurricane Michael. Due to the impact of Hurricane Michael, including the destruction of most of the city services facilities, the city made the decision to move forward with their plans to design a City Complex for the property and abandon the locations of the damaged facilities at the October 22, 2018, Commission meeting. The proposed City Complex has been discussed at many subsequent Commission meetings, which also included discussions of plans to

pursue alternate funding sources for the repair of the parks, the construction of a new community center, and the construction of a Nature Park on the tract proposed for a stormwater retention pond adjacent to the City Complex (Appendix G). They commissioned the development of a video announcing the Complex and other planned and completed city improvements called *The Future is Now*. The city posted the video and other information on their website ([www.springfieldfl.net](http://www.springfieldfl.net)) in November 2021, continuing until the present. The video also appears on two of the city's Facebook pages, including City of Springfield, Florida Stormwater and Springfield Fire Rescue, Florida (both posted on December 1, 2021) with comments limited to the road repaving efforts. The city also provided information on their website concerning Community Development Block Grants (CDBG) funding proposals and awards for many of the municipal projects, park design and repairs, and the proposed new Civic Center. The conceptual plan for the new City Complex, the city parks master plan, and the Springfield master utility and road resurfacing plan were posted on the website under the Department of Public Works ([www.springfieldfl.net/publicworks](http://www.springfieldfl.net/publicworks)). Exterior renderings of each of the facilities comprising the City Complex were provided on YouTube through links posted on the City's website ([www.springfieldfl.net/community/page/springfield-future-now-alert-bay-and-public-notice-website-click-here](http://www.springfieldfl.net/community/page/springfield-future-now-alert-bay-and-public-notice-website-click-here)) since Dec 21, 2021.

Following Hurricane Michael, the City of Springfield worked with the National Park Service to develop recreational conceptual plans for Henry Brooks Memorial Park, Buddy McLemore Park, Springfield Gardens Walking Park, the Sports Complex and the proposed Nature Park adjacent to the proposed City Complex. During these efforts, the city held two public meetings on December 3 and 5, 2019 and two briefings at the City Council meetings, distributed a survey on the City's website to solicit input from citizens, provided an informational table at the annual Founder's Day celebration on February 29, 2020, and interviewed users at the park sites. Based on the results of these activities, the NPS worked with the city to develop conceptual plans for each of the parks and provided additional recommendations for recreational opportunities based on their observations during the public input process. The city also worked with the Recovery and Resilience Partnership (R2P2) to assist with ideas to make improvements to the city following Hurricane Michael. The result of the collaboration was a series of draft design concepts concerning business revitalization along Highway 98; community connectivity with sidewalks, bike lanes, and road crossings; and stormwater management combined with recreation opportunities. The ideas were posted on the R2P2 website (<https://r2p2.skeo.com/springfield/>) that also provided information on opportunities for public input, including a city commission meeting on July 6, 2020; a virtual open house from July 6 to July 17, 2020; and a City Hall comment box available from July 6 to July 17, 2020. And finally, the city reached out to the community through the media with articles outlining the City's hurricane recovery plans on Mypanhandle.com in 2018 and between 2021 and 2022. These articles included discussions of the new city complex, the new civic center, and plans for the Buddy McLemore Park and the proposed Nature Park.

Public comments concerning the recovery activities following Hurricane Michael have been minimal. Recorded comments during the biweekly Commission meetings have generally centered

around the topic of the timeline of repairs to the local parks. One citizen expressed concern with the lack of interest the public had in developing future plans for the city's parks. In addition, a question was asked concerning the fate of the Shaw property which was formerly used for training and records storage for the city's emergency services. One citizen expressed concern with the new Civic Center planned for the site of the previous City Hall/Police Station by inquiring about the building's setback from 3<sup>rd</sup> Street as well as flooding on the site. The only comment concerning the proposed City Complex was potential noise issues from the sirens of emergency responders. The mayor reminded the citizen that emergency vehicles frequent Transmitter Road already and that the move was important so emergency vehicles could quickly respond to calls all over the county from a centrally located facility. The events conducted as part of the R2P2 collaboration resulted in a summary of public input into the repair and improvement to the city's parks, including Henry Brooks Memorial Park, Buddy McLemore Park, Springfield Gardens Walking Park, the Sports Complex, and the proposed Nature Park adjacent to the City Complex. The comments that were recorded were limited to suggestions for improvements to the parks such as improved access and parking; additional trails, play areas, and benches; additional shade structures and vegetation; improved sports venues with amenities; additional water features with associated recreational opportunities; information kiosks and signs; and the addition of dog parks. The local newspaper advertisements did not result in any public comment. The city's Facebook posts on December 1, 2021, received no comments on the City Complex or the donor projects.

Alternative 3 would not have a disproportionately high or adverse human health or environmental effects on low-income populations. Municipal services would benefit all populations by providing a centralized location for the City of Springfield municipal functions and critical facilities for faster response times during an emergency event. In addition, the city would have sufficient space within the City Complex structures to operate and store necessary files for easy access. Although the City Complex would move many of the services one mile further to the north, access would not be challenging due to the location of the City Complex along two major routes through town. 15<sup>th</sup> Street, which is included in a public bus route with a bus stop at the proposed location. Adequate parking will also be available for citizens to access the facility. The city continues to pursue funding for the repair and upgrade of the city parks which have already been partially completed at the Springfield Gardens Walking Park through funding from the National Fitness Campaign in 2022.

## **6.0 CUMULATIVE IMPACTS**

Per the Council on Environmental Quality (CEQ) regulations, cumulative impacts refer to the impact on the environment that "results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time" (40 CFR

1508.7). CEQ's regulations for implementing NEPA require an assessment of cumulative effects during the decision-making process for federal projects. In accordance with NEPA, this EA considered the combined effect of the preferred alternative and other actions occurring or proposed in the vicinity of the proposed project sites.

The City of Springfield is one of four smaller communities that surround Panama City and Panama City Beach in Bay County on the panhandle of Florida. Many of the city's municipal service facilities were built between 1956 and 1985 although the damaged city hall was constructed as early as 1942. The County's population has more than quadrupled since 1950 with Springfield experiencing twice the growth of the County, including a significant growth between 1950 and 1960 although the population has recently declined since Hurricane Michael. Many of the municipal services have outgrown their aging buildings.

In addition, the City of Springfield is vulnerable and expected to be subjected to damages from future tropical storms and hurricanes resulting from its location, low elevation, and the effects of global warming and sea level rise. In 2018 Hurricane Michael severely impacted Bay County and destroyed many of Springfield's municipal facilities as well as Everitt Middle School, which remains closed. Since 2018, the city's municipal functions have been operating at 408 School Avenue, which includes a library building that was repurposed following the storm and a temporary building. Currently there is not a permanent location for critical services due to the damages caused by Hurricane Michael.

Following the storm, Springfield has increased its efforts to plan for updates and improvements to the city. Among the city's goals are the elimination of existing blight, mitigation of the impact of localized flooding, improving parks, and upgrading the municipal facilities. The city has also planned to move their emergency responders further away from the railroad that crosses the city in case of chemical spills or derailments. In addition to the City Complex, they have worked with the U.S. Park Service and R2P2 to create a list of future improvements to the city with guidance from ideas generated within the community. While some of the ideas were identified prior to the storm such as the City Complex, the need for recovery since the storms has given the city opportunity to accelerate the timeframe for these improvements. CDBG grant funding was procured to improve the streetscape along School Avenue from 3<sup>rd</sup> Street north to 15<sup>th</sup> Street, including the addition of bike lanes and improved sidewalks. Sixty additional low-income housing units were constructed on Eighth Street and opened in 2021 with more planned. Funding for a new Civic Center to be constructed on the site of the demolished City Hall/Police Station has already been secured with construction to start soon. The city has partially repaired the city's vehicle maintenance shed and wash bay to continue operations until a new facility can be constructed. Improvements in the form of a fitness court and yoga pad to the Springfield Walking Park have been completed through funding from the National Fitness Campaign in 2022. The city has developed renderings for many of its other parks with plans to improve these facilities as funding becomes available. This includes the demolition of the shuttered Springfield Medical Center to

provide additional parking and space for a stormwater pond at Buddy McLemore Park. FEMA grant funding to repair many of the city's damaged parks and recreational facilities has been diverted to the city's highest priority, the construction of the City Complex. Recovering and transforming Springfield to its full potential will take several decades and will be implemented incrementally as funding allows.

The new location of the City Complex would make municipal facilities more accessible since they would no longer be located along a secondary road adjacent to a railroad track that can sometimes block access when in use. Increasing the distance between the police and fire departments and the railroad is consistent with the long-term objective to relocate emergency services further from potential spills or derailments. Increasing the distance between municipal facilities and the coast is consistent with the long-term objective to relocate services to reduce the impact of severe storms, floods, and tidal surge. These activities are being undertaken as a part of the necessary recovery efforts following Hurricane Michael, with a focus on reducing future risk by removing or mitigating critical facilities in higher risk areas and improving the stormwater infrastructure.

The greatest effect on the City of Springfield from recent events is the destruction of many of the city's municipal structures. The continued absence of adequate emergency and administrative facilities has impacted the entire community. The city leaders want to be able to restore the facilities in a manner that provides a centralized and modern approach to providing these services. Such a goal has been under consideration in Springfield for a number of years, even predating Hurricane Michael, which has presented an excellent opportunity for the city to achieve these goals on the budget of a small town. In addition, the city is attempting to update the infrastructure for the citizens to include better and safer transportation and pedestrian access, replacement of aging utilities, and the reduction of flooding hazards. These updates are being prioritized and conducted at the expense of some recreational repairs and improvements although the city has spent considerable time and resources developing ideas and renderings of improvements to the city's existing parks and recreational facilities as well as plan for additional facilities. They have completed minimal repairs to keep the facilities operational and conducted a few improvements as money has been procured.

The proposed action would have minor short-term impacts to noise levels, air quality, and traffic patterns at and near the proposed project location. However, it is expected the proposed action would not have long-term negative impacts of any of these resources in the project area, as these short-term impacts would be a result of construction activities, which would be temporary. In consideration of the overall impact of the proposed project in relation to impacts from past, present, and reasonably foreseeable future activities, the proposed action is not expected to have significant adverse cumulative impacts on any resource or on the community.



## 7.0 PERMIT AND PROJECT CONDITIONS

- 7.1.** For the preferred alternative, the City of Springfield (Applicant) has received a Northwest Florida Water Management District Environmental Resource Permit (ERP) (Permit No. ERP #IND-005-305567-1), which constitutes consistency review under the state's coastal zone management program. The permit also constitutes a water quality certification under Section 401 of the Clean Water Act. The permit includes general and project specific conditions for the project. Springfield would need to obtain another FDEP ERP permit before constructing the Phase II Pond.
- 7.2.** Under Alternative 3, State Historic Preservation Office (SHPO)/ National Historic Preservation Act (NHPA) Conditions are applicable.
- a. If human remains or intact archaeological deposits are uncovered, work in the vicinity of the discovery will stop immediately and all reasonable measures to avoid or minimize harm to the finds will be taken. The Applicant will assure that archaeological discoveries are secured in place, that access to the sensitive area is restricted, and that all reasonable measures are taken to avoid further disturbance of the discoveries. The Applicant's contractor will provide immediate notice of such discoveries to the Applicant. The Applicant will contact the Florida Division of Historical Resources and FEMA within 24 hours of the discovery. Work in the vicinity of the discovery may not resume until FEMA has completed consultation with the State Historic Preservation Office, tribes, and other consulting parties as necessary. If unmarked human remains are encountered during permitted activities, all work will stop immediately, and the proper authorities will be notified in accordance with Florida Statutes, Section 872.05.
  - b. If prehistoric or historic artifacts, such as pottery or ceramics, projectile points, dugout canoes, metal implements, historic building materials, or any other physical remains that could be associated with Native American, early European, or American settlement are encountered at any time within the project site area, the permitted project shall cease all activities involving subsurface disturbance in the vicinity of the discovery. The applicant shall contact the Florida Department of State, Division of Historical Resources, Compliance Review Section at (850)-245-6333. Project activities shall not resume without verbal and/or written authorization. In the event that unmarked human remains are encountered during permitted activities, all work shall stop immediately, and the proper authorities notified in accordance with Section 872.05, *Florida Statutes*.

**7.3.** Under Alternative 2 and 3, all handling and disposal of demolition debris generated during construction activities would be handled with in a manner consistent with FDEP and state regulations.

## **8.0 PUBLIC INVOLVEMENT**

FEMA issued a disaster-wide initial public notice for Hurricane Michael on October 30, 2018, to notify the public of projects under the Public Assistance program that may be occurring within floodplains.

## **9.0 AGENCY COORDINATION**

The following agencies were contacted during the preparation of this EA:

- State Historic Preservation Officer
- Alabama-Quassarte Tribal Town
- Alabama-Coushatta Tribe of Texas
- Miccosukee Tribe
- Muscogee (Creek) Nation
- Poarch Band of Creek Indians
- Seminole Tribe of Florida
- Seminole Nation of Oklahoma
- Choctaw Nation of Oklahoma
- Mississippi Band of Choctaw
- Jena Band of Choctaw Indians

## **10.0 LIST OF PREPARERS**

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**Appendices are available for review upon request to  
FEMA-R4EHP-Florida@fema.dhs.gov.**