

Supplemental Environmental Assessment

Alligator Drive Road Repairs

FEMA-4399-DR-FL

Franklin County, Florida

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FEMA

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ACRONYMS AND ABBREVIATIONS

APE	Area of Potential Effect
BMP	Best Management Practice
CEQ	Council on Environmental Quality
CFR	<i>Code of Federal Regulations</i>
County	Franklin County
EA	Environmental Assessment
EO	Executive Order
FCMP	Florida Coastal Management Program
FDEP	Florida Department of Environmental Protection
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FMSF	Florida Master Site File
FONSI	Finding of No Significant Impact
IPaC	Information for Planning and Consultation
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NPDES	National Pollution Discharge Elimination System
NRHP	National Register of Historic Places
PA	Public Assistance
PL	Public Law
PN	Project Number
PW	Project Worksheet
SEA	Supplemental Environmental Assessment
SHPO	State Historic Preservation Office
Stafford Act	Robert T. Stafford Disaster Relief and Emergency Assistance Act
ROW	Right of Way
THPO	Tribal Historic Preservation Office
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
USGS	United States Geological Survey

1.0 INTRODUCTION

Hurricane Michael impacted Florida between October 7 to October 19, 2018, bringing strong winds, storm surge, and flooding. President Trump signed a disaster declaration (FEMA-4337-DR-FL) on October 11, 2018 authorizing the Department of Homeland Security's Federal Emergency Management Agency (FEMA) to provide federal assistance to the designated areas of Florida. This assistance is provided pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), Public Law (PL) 93-288, as amended. Section 406 of the Stafford Act authorizes FEMA through its Public Assistance (PA) Program to fund the repair, restoration, and replacement of state and local government and certain private nonprofit facilities damaged as a result of the event.

Franklin County, Florida was designated as a county eligible to receive federal assistance. Franklin County has applied through the PA Program to receive funding to repair the damaged portions of Alligator Drive (Appendix A, Figure 1) back to pre-disaster condition as well as implement hazard mitigation protection measures which includes the elevation of the road, installation of a vertical steel seawall, and a stormwater treatment system. The improvements will provide protection against future storm erosion damage. The project worksheet (PW) and associated project number (PN) for these proposed actions are PW 01152 PN 76655.

Franklin County has obtained permits to conduct the work associated with this project from the United States Army Corps of Engineers (USACE), Permit # SAJ-2018-02262 (NW-TLW) and the Florida Department of Environmental Protection (FDEP), Permit # 0368073-002-EI/19.

FEMA prepared an Environmental Assessment (EA) for a 1000-foot portion of the area due to damages by Hurricane Hermine in early September 2016 and issued a Finding of No Significant Impact (FONSI) on the proposed action on January 17, 2018. This draft Supplemental Environmental Assessment (SEA) has been prepared to address the original 1000-foot portion and an additional 160-foot section, elevation of the road, seawall, and stormwater treatment system added to the original project proposal as part of the proposed repairs due to Hurricane Michael, and has been conducted in accordance with NEPA, the President's Council on Environmental Quality (CEQ) regulations for implementing NEPA (40 Code of Federal Regulations [CFR] 1500-1508) and regulations adopted pursuant to U.S. Department of Homeland Security Directive 023-01, Rev 01, and FEMA Directive 108-1.

2.0 PURPOSE AND NEED

In 2018, Franklin County was awarded federal funding under the disaster declaration for Hurricane Hermine to repair approximately 1,000 linear feet of Alligator Drive, a two-lane asphalt road. While waiting for the necessary regulatory permits to be issued, Hurricane Michael impacted Alligator Drive before the county was able to start construction, leaving the road further damaged. Hurricane Michael's approximately 9 to 11-foot tidal surge displaced rip rap and Jersey barriers along the coastline causing approximately an additional 160 linear feet of Alligator Drive to wash away (Appendix A, Figure 2); adjacent and underneath watermain piping was also damaged. The community has identified the need to restore the capacity of Alligator Drive as it serves as the sole access and evacuation route for approximately 500 homes in Alligator Point. Franklin County has constructed a temporary graded unpaved one-lane access road in the same location as the previous road until permanent road repairs can be completed.

The purpose of the Proposed Action is to afford Franklin County the means to provide access for residents directly impacted by the damages of Alligator Drive. This solution will allow residents to

safely commute on a daily basis and evacuate in emergency situations. The Proposed Action would be approved under Section 406 of the Stafford Act, which allows PA disaster relief funds to be allocated to local, county, and state governments to repair or replace infrastructure damaged during a declared disaster.

3.0 ALTERNATIVES

Under NEPA, this SEA is required to analyze the potential environmental impacts of the Proposed Action, the No Action Alternative, and reasonable alternatives. Reasonable alternatives are those meeting the underlying purpose of, and need for, the Proposed Action; are feasible from both technical and economic standpoints; and meet reasonable screening criteria (selection standards) suitable to a particular action. Screening criteria may include requirements or constraints associated with operational, technical, environmental, budgetary, and time factors. Alternatives determined to not be reasonable were eliminated from detailed analysis in this SEA.

3.1 Alternative 1 – No Action Alternative

Under Alternative 1, the Proposed Action would not be implemented. The existing unpaved one-lane access road would be retained and no repairs with hazard mitigation protection would occur. Alligator Drive would continue to deteriorate and damage from future storms may occur. The community will continue to be impacted by the lack of a paved road that can be safely used for daily commuting and as evacuation.

3.2 Alternative 2 – Repair Alligator Drive to Pre-Disaster Conditions

Under Alternative 2, the damaged portion of Alligator Drive would be repaired in the same location to pre-disaster conditions (Appendix A, Figure 2). This alternative would include clearing remaining road material, rebuilding the road, and replacing the associated revetment. The road would remain vulnerable to future storm events and would likely be subjected to similar erosion damages, contributing to the ongoing access issues for the residents of the community.

3.3 Alternative 3 – Repair Alligator Drive with Hazard Mitigation (Preferred Alternative)

Under Alternative 3, the Preferred Alternative, the damaged portion of Alligator Drive would be repaired in the same location with hazard mitigation protection to prevent future storm erosion damage. The project consists of a 1,160-foot section of Alligator Drive. The hazard mitigation proposal includes adding additional base material to elevate the road structure, and installing 6-foot concrete shoulders on each side of the road right-of-way, vinyl sheet piles to a depth of approximately 10 feet on the landward side of the road, a 9-foot concrete sloped pavement splash pad along the coastal edge of the road, a concrete class II bulkhead, and steel sheet piles to a depth of approximately 15 feet between the road structure and the rip rap along the coastline. A stormwater treatment system for runoff will also be installed adjacent to the road and will include six (6) stormwater swales with an approximate combined size of 14,400 square-feet along the landward side of the road and a stormwater swale pond with an approximate size of 4,294 square-feet on the west side of the project area (Appendix A, Figure 2). The swales will be connected underground by Reinforced Concrete Pipes (RCP). Construction for the road repairs, sheet pile retaining walls, and stormwater treatment system would take approximately 6 months to complete. The damaged water main pipes that were located underneath and adjacent to the road will be repaired and relocated if necessary by the Alligator Point Water Resources District.

3.4 Alternative Eliminated from Detailed Analysis

In the past other vulnerable sections of Alligator Drive have been successfully relocated, therefore, an alternative considered by the Alligator Point community and Franklin County was to relocate the damaged portion of Alligator Drive. The county would have to acquire the necessary properties since there is no undeveloped land available to plan for relocation of additional sections of the road. Due to the lack of vacant land, the potential cost of acquiring parcels currently in use, and additional length of time that would be required this alternative was eliminated from analysis as it would not timely meet the applicant’s purpose and need and not a practicable alternative at this time.

4.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

The coastal community of Alligator Point is located in the easternmost corner of Franklin County and is bordered by the Gulf of Mexico on the south and Alligator Harbor on the north. The project area is approximately 1,160 linear feet of Alligator Drive between GPS coordinates (29.896099, -84.366573) and (29.894989, -84.370019) (Appendix A, Figure 2). A small number of residential structures are located on both sides of the road, vegetation is limited, and the majority of the coastline within the project area is currently covered by displaced rock revetment (boulder rip rap) and pieces of broken asphalt road. An area of approximately 0.20 acre of sandy beach is located in the easternmost portion of the project limits.

This section addresses the Affected Environment (existing conditions) and Environmental Consequences (potential impacts) of the Proposed Action. The following terms are used to describe the magnitude of impacts described in this SEA:

Table 4.0: 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.

4.1 Potential Environmental Consequences

The potential environmental consequences, environmental protection measures, and required permits of Alternative 1, Alternative 2, and the Alternative 3 are summarized in Table 4.1.

Table 4.1: Environmental Consequences by Alternative

Resource	Environmental Consequences	Environmental Protection Measures and Required Permits
Air Quality	No change – see FEMA EA Section 4.2	Generated fugitive dust would be controlled using standard construction best management practices (BMPs), including watering of exposed surfaces and enclosing or covering stockpiled material.
Noise	No change – see FEMA EA Section 4.3	All construction and demolition activities would be conducted during daylight hours.
Geology and Soils See Section 4.2 for details.	Updated – see FEMA EA Section 4.4 Alternative 1– Minor – Not Significant Alternative 2–Minor–Not Significant Alternative 3–Short term minor impacts from construction, No long-term impacts.	For Alternative 2 and 3 shallow soils and geology will be disturbed during construction. Appropriate BMPs and engineering controls would be implemented during construction to prevent and minimize soil erosion and sedimentation, per the Stormwater Pollution Prevention Plan (SWPPP) that would be prepared and implemented.
Surface Water and Wetlands See Section 4.3 for details.	Updated – see FEMA EA Section 4.5 Surface Water: Alternative 1–Minor Alternative 2– Negligible Alternative 3– Negligible Wetlands: Alternative 1–None Alternative 2– None	For Alternative 2 and 3, the applicant has obtained FDEP Environmental Resource Permit (ERP) # 0368073-002-EI/19 and an active project-specific Emergency Final Order (EFO) # 19-1780 from FDEP which will be utilized in lieu of a Coastal Construction Control Line (CCCL) standard permit. If the project area is more than 1 acre, a National Pollutant Discharge Elimination System (NPDES) stormwater construction permit from the FDEP would be required. An associated Storm Water Pollution Prevention Plan (SWPPP), which would identify the BMPs and engineering controls to prevent and minimize indirect erosion, sedimentation,

	Alternative 3– Negligible	and pollution impacts to the Gulf of Mexico, would be required to be prepared and implemented. For Alternative 2, the applicant received USACE Permit # SAJ-2018-02262 (NW-TLW).
Groundwater	No change – see FEMA EA Section 4.6	Hazardous materials used and hazardous wastes generated during construction would be managed in accordance with applicable environmental compliance regulations to prevent releases to groundwater.
Floodplains See Section 4.4 for details.	Updated – see FEMA EA Section 4.7 Alternative 1– None Alternative 2– Minor– Not Significant Alternative 3– Minor– Not Significant	Not applicable.
Vegetation	No change – see FEMA EA Section 4.8	Not applicable.
Wildlife	No change – see FEMA EA Section 4.9	Not applicable.
Threatened and Endangered Species See Section 4.5 for details	Updated – see FEMA EA Section 4.10 Alternative 1– None Alternative 2–None Alternative 3–Minor– May Affect but Not Likely to Adversely Affect the loggerhead sea turtle (<i>Caretta caretta</i>), green sea turtle (<i>Chelonia mydas</i>), and West Indian manatee (<i>Trichechus manatus</i>).	Under Alternative 3, Per the USFWS letter dated April 21, 2020: if construction occurs during sea turtle nesting season (May 1 through October 31), a qualified biologist would survey the suitable sea turtle nesting habitat within the project area every morning prior to initiation of construction activities. If sea turtles or sea turtle nests are sighted by the biologist within the construction area, no work would occur and the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service would be immediately consulted. Per USACE Permit # SAJ-2018-02262 (NW-TLW), the following conditions (protection measures) would be implemented during construction:Per USACE Permit # SAJ-2018-

		<p>02262 (NW-TLW), the following conditions (protection measures) would be implemented during construction:</p> <ol style="list-style-type: none">1. Sea Turtle and Smalltooth Sawfish Construction Conditions:<ol style="list-style-type: none">a. The permittee shall instruct all personnel associated with the project of the potential presence of these species and the need to avoid collisions with sea turtles and smalltooth sawfish. All construction personnel are responsible for observing water-related activities for the presence of these species.b. The permittee shall advise all construction personnel that there are civil and criminal penalties for harming, harassing, or killing sea turtles or smalltooth sawfish, which are protected under the Endangered Species Act of 1973.c. Siltation barriers shall be made of material in which a sea turtle or smalltooth sawfish cannot become entangled, be properly secured, and be regularly monitored to avoid protected species entrapment. Barriers may not block sea turtle or smalltooth sawfish entry to or exit from designated critical habitat without prior agreement from the National Marine Fisheries Service's Protected Resources Division, St. Petersburg, Florida.d. All vessels associated with the construction project shall operate at "no wake/idle" speeds at all times while in the construction area and while in water depths where the draft of the vessel provides less than a four-foot clearance from the bottom. All vessels will preferentially follow deep-water routes (e.g., marked channels) whenever possible.e. If a sea turtle or smalltooth sawfish is seen within 100 yards of the active daily construction/dredging operation
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		<p>or vessel movement, all appropriate precautions shall be implemented to ensure its protection. These precautions shall include cessation of operation of any moving equipment closer than 50 feet of a sea turtle or smalltooth sawfish. Operation of any mechanical construction equipment shall cease immediately if a sea turtle or smalltooth sawfish is seen within a 50-ft radius of the equipment. Activities may not resume until the protected species has departed the project area of its own volition.</p> <p>f. Any collision with and/or injury to a sea turtle or smalltooth sawfish shall be reported immediately to the National Marine Fisheries Service’s Protected Resources Division (727-824-5312) and the local authorized sea turtle stranding/rescue organization.</p> <p>g. Any special construction conditions, required of your specific project, outside these general conditions, if applicable, will be addressed in the primary consultation.</p> <p>2. Standard Manatee Conditions for In-Water Work:</p> <p>a. All personnel associated with the project shall be instructed about the presence of manatees and manatee speed zones, and the need to avoid collisions with and injury to manatees. The permittee shall advise all construction personnel that there are civil and criminal penalties for harming, harassing, or killing manatees which are protected under the Marine Mammal Protection Act, the Endangered Species Act, and the Florida Manatee Sanctuary Act.</p> <p>b. All vessels associated with the construction project shall operate at “Idle Speed/No Wake” at all times while in the immediate area and while</p>
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		<p>in water where the draft of the vessel provides less than a four-foot clearance from the bottom. All vessels will follow routes of deep water whenever possible.</p> <p>c. Siltation or turbidity barriers shall be made of material in which manatees cannot become entangled, shall be properly secured, and shall be regularly monitored to avoid manatee entanglement or entrapment. Barriers must not impede manatee movement.</p> <p>d. All on-site project personnel are responsible for observing water-related activities for the presence of manatee(s). All in-water operations, including vessels, must be shutdown if a manatee(s) comes within 50 feet of the operation. Activities will not resume until the manatee(s) has moved beyond the 50-foot radius of the project operation, or until 30 minutes elapses if the manatee(s) has not reappeared within 50 feet of the operation. Animals must not be herded away or harassed into leaving.</p> <p>e. Any collision with or injury to a manatee shall be reported immediately to the Florida Fish and Wildlife Conservation Commission (FWC) Hotline at 1-888-404-3922. Collision and/or injury should also be reported to the U.S Fish and Wildlife Service in Jacksonville (1-904-731-3336) for north Florida and to FWC at ImperiledSpecies@myFWC.com</p> <p>f. Temporary signs concerning manatees shall be posted prior to and during all in-water project activities. All signs are to be removed by the permittee upon completion of the project. Temporary signs that have already been approved for this use by the FWC must be used. One sign which reads <i>Caution: Boaters</i> must be posted. A second sign measuring at least 8 1/2" by 11"</p>
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		<p>explaining the requirements for the “Idle Speed/No Wake” and the shutdown of in-water operations must be posted in a location prominently visible to all personnel engaged in water-related activities. These signs can be viewed at MyFWC.com/manatee. Questions concerning these signs can be sent to the email address listed above.</p>
<p>Cultural Resources</p> <p>See Section 4.6 for details.</p>	<p>Updated – see FEMA EA Section 4.11</p> <p>Alternative 1–None Alternative 2 and 3 – None. Concurrence with SHPO received on FEMA’s determination of No Adverse Effects on Historic Properties on 05/20/2020.</p> <p>Alternative 2 and 3 – No impact. FEMA consulted with the following Native American tribes on the proposed undertaking: Alabama-Quassarte Tribal Town; Jena Band of Choctaw Indians; Miccosukee Tribe of Indians of Florida; Mississippi Band of Choctaw Indians; Muscogee (Creek) Nation; Poarch Band of Creek Indians; Seminole Tribe of Florida; and the Seminole Nation of Oklahoma. No responses were received.</p>	<p>Alternative 3 would require the following measures:</p> <ul style="list-style-type: none"> • 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 shall 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 SHPO, Tribes, and other consulting parties as necessary. 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 Florida Statutes, Section 872.05. • Prior to conducting repairs, applicant must identify the source and location of fill material and provide this information to FDEM and FEMA. If the borrow pit is privately owned, or is located on previously undisturbed land,

		<p>or if the fill is obtained by the horizontal expansion of a pre-existing borrow pit, FEMA consultation with the State Historic Preservation Officer will be required. Failure to comply with this condition may jeopardize FEMA funding; verification of compliance will be required at project closeout.</p> <ul style="list-style-type: none"> • Construction vehicles and equipment will be stored onsite during the project or at existing access points within the Applicant’s right-of-way. • Any changes to the approved scope of work will require submission to, and evaluation and approval by, the State and FEMA, prior to initiation of any work, for compliance with Section 106.
Hazardous Materials/Waste and Solid Waste	No change – see FEMA EA Section 4.12	<p>Handling, storage, and disposal of hazardous materials and wastes during construction activities, including measures to prevent releases, would be conducted in accordance with applicable environmental compliance regulations.</p> <p>Non-hazardous solid waste generated under Alternatives 2 or 3 would be disposed of at an offsite landfill or recycled/reused as appropriate.</p>
Utilities See Section 4.7 for details.	<p>Updated – see FEMA EA Section 4.9</p> <p>Alternative 1–Minor</p> <p>Alternative 2– Moderate</p> <p>Alternative 3– Moderate</p>	<p>Utilities in the area would be located before construction, and Franklin County would coordinate construction activities with utility companies. If planned outages are necessary, utility customers would be given advance notice.</p>
Land Use	No change – see FEMA EA Section 4.14	Not applicable.
Transportation and Traffic	No change – see FEMA EA Section 4.15	Not applicable.

<p>Occupational Health and Safety</p>	<p>No change – see FEMA EA Section 4.16</p>	<p>To minimize occupational health and safety risks, workers would wear and use appropriate personal protective equipment and follow applicable Occupational Safety and Health Administration (OSHA) standards and procedures.</p> <p>A health and safety plan would be developed and implemented.</p> <p>Work areas would be clearly marked with appropriate signage and secured against unauthorized entry.</p> <p>Standard construction traffic control measures would be used to protect workers, residents, and the travelling public.</p>
<p>Socioeconomics</p>	<p>No change – see FEMA EA Section 4.17</p>	<p>Not applicable.</p>
<p>Environmental Justice and Protection of Children</p>	<p>No change – see FEMA EA Section 4.18</p>	<p>All work areas would be secured against unauthorized entry to prevent health or safety risks to children.</p>
<p>Cumulative Impacts</p> <p>See Section 5.0 for details.</p>	<p>Updated – see FEMA EA Section 5.0</p> <p>When added to past, present, and reasonably foreseeable actions, Alternatives 1,2, and 3 are not expected to have significantly adverse cumulative impacts on any resource.</p>	<p>Not applicable</p>

4.2 Geology and Soils

4.2.1 Existing Environment

The project area is located in the Northern or Proximal physiographic zone of the Florida peninsula (White, 1970). The Geologic Map of Franklin County (Rupert, 1993) indicates the project area underlines Holocene sediments. “The Holocene sediments in Florida occur near the present coastline at elevations generally less than 5 feet (1.5 meters). The sediments include quartz sands, carbonate sands and muds, and organics” (USGS.gov). According to the Natural Resources Conservation Service (NRCS) soil data for Franklin County, soils underlying the project area include Corolla sand and Duckston sand (Appendix A, Figure 6). These soil types are more than 80 inches deep. The depth to the water table is between 18 and 36 inches in the Corolla sand series and about 0 to 12 inches in the

Duckston sand series (NCRS, 2019). These map units are not classified as prime farmland by the NRCS. Prime farmland is defined as land that has the best combination of physical and chemical characteristics for producing food, feed, forage, fiber, and oilseed crops, and is available for these uses.

4.2.2 Environmental Consequences

The threshold level for a significant impact to soils is defined as (1) a substantial loss of soil, or (2) a rating of 160 or higher on the Farmland Conversion Impact Rating Form (AD-1006 Form), which would indicate further consideration for protection under the Farmland Protection Policy Act.

Alternative 1 – No Action Alternative

Under the No Action Alternative, the existing temporary one-lane graded dirt access road would be retained, and no new road construction would occur. Without improvements, the road could slowly erode over time, particularly following storm events, and impact soils. Therefore, the No Action Alternative would have a minor impact on geology and soils.

Alternative 2 – Repair Alligator Drive to Pre-disaster Conditions

Under Alternative 2, repairing Alligator Drive to pre-disaster conditions would have minor impacts on shallow surficial geology and soils during grading and paving within and adjacent to the footprint of the temporary one-lane road. The site is relatively flat so grading will be limited and effects to geology and soils will be minor. The soils are not prime farmland, and they have already been disturbed by the existing road and by Hurricane Michael. Appropriate BMPs and engineering controls would be implemented during construction to prevent and minimize potential soil erosion and sedimentation. This section of Alligator Drive would continue to be susceptible to damage and erosion of soils during future storm events.

Alternative 3 – Repair Alligator Drive with Hazard Mitigation (Preferred Alternative)

Alternative 3 would have greater construction-related impacts on geology and soils than Alternative 2 because it would include the installation of concrete shoulders, sheet-pile retaining wall, and the installation of a stormwater treatment system. These hazard mitigation features would minimize road damage and erosion of soils during future storm events. Construction activities would have minor impact in geology since the project will take place in an area that has been previously disturbed by the construction of the road and the installation of the two water main pipes. As described in Alternative 2, BMPs and engineering controls would be implemented during construction. Based on the review conducted, Alternative 3 would have a minor impact on geology and soils.

4.3 Surface Water and Wetlands

4.3.1 Existing Environment

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

Section 404 of the Clean Water Act regulates the discharge of dredge or fill material into waters of the U.S., including wetlands. Section 10 of the Rivers and Harbors Act grants the USACE permitting jurisdiction for structures or works in or affecting navigable waters of the United States.

The project area is located next to the Gulf of Mexico on the south and approximately 0.30 miles from Alligator Harbor on the north. The Harbor is home of the Alligator Harbor Aquatic Preserve which is classified as an Outstanding Florida Water. The project is not located in the vicinity of the preserve and no wetlands are within the project area (Appendix A, Figure 4).

4.3.2 Environmental Consequences

The threshold level for a significant impact to surface water and wetlands 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 water body or wetland.

Alternative 1 – No Action Alternative

Under the No Action Alternative, the existing one-lane access road would continue to be unpaved and the construction of an improved road would not occur. The road would be vulnerable to weather events and could erode over time. Therefore, the No Action Alternative would have no effect on wetlands and a minor impact on surface water.

Alternative 2 – Repair Alligator Drive to Pre-disaster Conditions

Under Alternative 2, repairing Alligator Drive to pre-disaster conditions would require an Environmental Resource Permit (ERP) and the utilization of the project-specific Emergency Final Order (EFO) # 19-1780 from the FDEP. The project would be required to obtain a National Pollutant Discharge Elimination System (NPDES) stormwater construction permit if ground disturbing activities are more than 1 acre of land. Repair work will be conducted within the existing right-of-way (ROW), therefore, no work in the water is expected. Based on the review conducted, Alternative 2 would have no effect on surface waters and/or wetlands.

Alternative 3 – Repair Alligator Drive with Hazard Mitigation (Preferred Alternative)

Under Alternative 3, Franklin County has obtained FDEP ERP # 0368073-002-EI/19 and the project-specific EFO # 19-1780 issued from by FDEP. The EFO will be utilized in lieu of a Coastal Construction Control Line (CCCL) permit. An NPDES stormwater construction permit will also be required since the project will have ground disturbing activities of more than 1 acre. Additionally, the applicant obtained USACE permit # SAJ-2018-02262 (NW-TLW) for the repairs to the rip rap and installation of steel sheet piles on the seaward side of the proposed elevated road. The proposed work of repairing Alligator Drive with hazard mitigation protection would be conducted within the existing ROW, therefore, minimal work in the water is expected. Based on the review conducted, Alternative 3 would have negligible effect on surface waters and/or wetlands.

4.4 Floodplain Management (Executive Order 11988)

4.4.1 Existing Environment

EO 11988 requires federal agencies to take action to minimize occupancy and modification of the floodplain. Specifically, EO 11988 prohibits federal agencies from funding construction in the 100-year floodplain unless there are no practicable alternatives. FEMA's regulations for complying with EO 11988 are promulgated in 44 CFR Part 9. Based on the current FEMA Flood Insurance Rate Map (FIRM), the project area is located within the coastal high hazard area (VE Zone) (Appendix D).

4.4.3 Environmental Consequences

The threshold level for a significant impact to floodplains would be an excessive loss of floodplain area with an associated increase in flooding potential.

Alternative 1 – No Action Alternative

Under the No Action Alternative, the existing one-lane access road would be retained, and no new road construction would occur. The No Action Alternative would have no effect on floodplains, however, the one-lane access road will continue to be susceptible to flood damage.

Alternative 2 – Repair Alligator Drive to Pre-disaster Conditions

Under Alternative 2, repairing Alligator Drive to pre-disaster conditions would not result in significant impact to the floodplain area since the actions proposed would only involve the replacement of impervious surface that was previously existing in the floodplain but was removed by Hurricane Hermine and further damaged by Hurricane Michael. Alternative 2 would have minor impact on floodplains, however, the road will continue to be susceptible to flood damage from future storms.

Alternative 3 – Repair Alligator Drive with Hazard Mitigation (Preferred Alternative)

Under Alternative 3, repairing Alligator Drive with hazard mitigation protection would displace approximately 18,694 square feet (0.43 acre) of the floodplain via the reconstruction and elevation of the road, installation of concrete shoulders, and the construction of a stormwater treatment system. An engineering analysis provided by Franklin County determined the proposed project will not cause adverse effects to the floodplain. Additionally, the Franklin County Zoning and Floodplain Administrator, Amy M. Kelly, determined the proposed activities are consistent with the local floodplain ordinance. The proposed hazard mitigation activities which include the elevation of the road, revetment, and stormwater treatment system will minimize the risk of flood and damage of the road during future storms. The eight-step decision-making process, as described in 44 CFR 9, for projects within or that have the potential to impact a floodplain was completed (Appendix C). Based on the review conducted, Alternative 3 would have a minor impact on floodplains.

4.5 Threatened and Endangered Species

4.5.1 Existing Environment

In accordance with Section 7 of the Endangered Species Act (ESA) of 1973, the project was evaluated for the potential occurrences of federally listed threatened and endangered species. The ESA requires any federal agency that funds, authorizes or carries out an action to ensure that their action is not likely to jeopardize the continued existence of any endangered or threatened species or result in the destruction or adverse modification of designated critical habitats.

The portion of the project area north of Alligator Drive consists of disturbed areas that abut residential lots providing little to no habitat for wildlife. The portion of the project area south of Alligator Drive consists mostly of boulder riprap; the easternmost portion of this area includes approximately 0.2 acre of beach that is bordered by boulder riprap, Alligator Drive, and a residence (Appendix A, Figure 5). Potential threatened and endangered species that may be present in the project area were identified by accessing the United States Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) database on March 27, 2020. The endangered species likely to occur in the project area are the Kemp's ridley sea turtle (*Lepidochelys kempii*) and the leatherback sea turtle (*Dermochelys coriacea*). The threatened species likely to occur in the project area are the West Indian manatee

(*Trichechus manatus*), piping plover (*Charadrius melodus*), red knot (*Calidris canutus rufa*), wood stork (*Mycteria Americana*), eastern indigo snake (*Drymarchon corais couperi*), green sea turtle (*Chelonia mydas*), loggerhead sea turtle (*Caretta caretta*), and the Atlantic sturgeon (*Acipenser oxyrinchus desotoi*). No designated critical habitats were identified within the boundaries of the project areas.

4.5.2 Environmental Consequences

The threshold level for a significant impact to threatened and endangered species is defined by the take of an individual protected under the ESA.

Alternative 1 – No Action Alternative

Under the No Action Alternative, the existing one-lane access road would be retained, and no new road construction would occur, therefore there would be no potential for effects and no further responsibility under the ESA. Therefore, the No Action Alternative would have no effect on threatened or endangered species.

Alternative 2 – Repair Alligator Drive to Pre-disaster Conditions

Under Alternative 1, the area within the construction footprint does not contain designated critical habitats, however, if construction occurs during sea turtle nesting season (May 1 through October 31), the following protection measures would be implemented to prevent potential impacts to sea turtles: A qualified biologist would survey the suitable sea turtle nesting habitat within the project every morning prior to initiation of construction activities and if sea turtles or sea turtle nests are sighted by the biologist within the construction area, no work would occur and the USFWS and National Marine Fisheries Service (NMFS) would be immediately consulted. Provided that these protection measures are implemented, Alternative 2 is not expected to adversely affect threatened species that may be present in the area. Therefore, Alternative 2 would have no impact on threatened or endangered species.

Alternative 3 – Repair Alligator Drive with Hazard Mitigation (Preferred Alternative)

Under Alternative 3, repairing Alligator Drive with hazard mitigation protection would potentially result in the loss of 0.2-acre beach in the easternmost portion of the project area. FEMA consulted with the USFWS, and in a letter dated April 21, 2020 (Appendix B), it was determined that the proposed project may affect but not likely to adversely affect the loggerhead sea turtle (*Caretta caretta*), green sea turtle (*Chelonia mydas*), and West Indian manatee (*Trichechus manatus*). The project will be required to meet the following condition as required by the USFWS:

If construction under Alternative 3 occurs during sea turtle nesting season (May 1 through October 31), area a qualified biologist would survey the suitable sea turtle nesting habitat within the project every morning prior to initiation of construction activities. If sea turtles or sea turtle nests are sighted by the biologist within the construction area, no work would occur and the USFWS and NMFS would be immediately consulted.

The project will also adhere to the Sea Turtle and Smalltooth Sawfish Construction Conditions and the Standard Manatee Conditions for In-Water Work (Appendix D) as required by USACE Permit # SAJ-2018-02262 (NW-TLW). Provided that these protection measures are implemented, Alternative 3 is not expected to adversely affect threatened species that may be present in the area. Therefore, Alternative 3 would have minor effect on threatened or endangered species.

4.6 Cultural Resources

4.6.1 Existing Environment

Consideration of impacts to cultural resources is mandated by Section 106 of the National Historic Preservation Act (NHPA) as implemented by 36 CFR Part 800. Requirements include identifying historic properties that may be impacted by the proposed action or alternatives within the area of potential affect (APE). Historic properties may be archeological sites, structures, historic districts, or other historic resources listed in or determined eligible for listing in the National Register of Historic Places (NRHP). If adverse effects on historic, archeological, or cultural properties are identified, federal agencies must attempt to avoid, minimize, or mitigate the impacts to these resources.

FEMA, the Florida State Historic Preservation Office (SHPO), the Florida Division of Emergency Management, the Choctaw Nation of Oklahoma, and the Advisory Council on Historic Preservation have executed a Statewide Programmatic Agreement dated September 10, 2014 to streamline the Section 106 review process.

4.6.2 Environmental Consequences

The threshold level for significant impacts to cultural resources under NEPA 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 Native American tribe as a sacred site.

Alternative 1 – No Action Alternative

Under the no action alternative, no undertaking by FEMA and no construction would occur, therefore there would be no potential for effects and no further responsibility under Section 106. Based on the review conducted, Alternative 1 would have no effect on cultural resources.

Alternative 2 – Repair Alligator Drive to Pre-disaster Conditions

Under Alternative 2, repairing Alligator Drive to pre-disaster conditions would not result in significant impact to cultural resources since the actions proposed would only involve the reconstruction of the road in the same area as it was originally built. The area has been previously disturbed by the construction of the road. Based on the review conducted, Alternative 2 would have no effect on cultural resources.

Alternative 3 – Repair Alligator Drive with Hazard Mitigation (Preferred Alternative)

Under Alternative 3, FEMA evaluated potential resources in the APE utilizing the Florida Master Site File (FMSF) and previous surveys in the project area. It was determined no properties within the APE are listed in the National Register of Historical Places (NRHP) and also project areas are considered to have a low archeological site potential. In a letter dated May 20, 2020 (Appendix B), the SHPO concurred with FEMA's determination of *No Adverse Effect on Historic Properties*. The following conditions will be applied to the project:

- 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 shall 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 SHPO, Tribes, and other consulting parties as necessary. 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 Florida Statutes, Section 872.05.

- Prior to conducting repairs, applicant must identify the source and location of fill material and provide this information to FDEM and FEMA. If the borrow pit is privately owned, or is located on previously undisturbed land, or if the fill is obtained by the horizontal expansion of a pre-existing borrow pit, FEMA consultation with the State Historic Preservation Officer will be required. Failure to comply with this condition may jeopardize FEMA funding; verification of compliance will be required at project closeout.
- Construction vehicles and equipment will be stored onsite during the project or at existing access points within the Applicant's right-of-way.
- Any changes to the approved scope of work will require submission to, and evaluation and approval by, the State and FEMA, prior to initiation of any work, for compliance with Section 106.

FEMA also consulted with the following Native American tribes on the proposed undertaking: Alabama-Quassarte Tribal Town; Jena Band of Choctaw Indians; Miccosukee Tribe of Indians of Florida; Mississippi Band of Choctaw Indians; Muscogee (Creek) Nation; Poarch Band of Creek Indians; Seminole Tribe of Florida; and the Seminole Nation of Oklahoma. No responses were received.

Based on the review conducted, Alternative 3 would have no effect on cultural resources.

4.7 Utilities

4.7.1 Existing Environment

Two water main pipes located adjacent and underneath Alligator Drive were damaged during Hurricane Michael's tidal surge. Alligator Point Water Resources District will be repairing the water main pipes and associated valves after being awarded funding from FEMA under the declared disaster. A section of the Water Resources District project is situated in the same location as the project area that is the subject of study in this SEA. The repairs for the water main pipes will commence once the repair of Alligator Drive with hazard mitigation proposed by Franklin County will begin. Electric power poles and lines are owned by Duke Energy and there are no sanitary sewer lines in the right of the way (ROW) because Alligator Point uses onsite sewage disposal systems.

4.7.2 Environmental Consequences

The threshold level for a significant impact to utilities would be an exceedance of the existing utility service capacity.

Alternative 1 – No Action Alternative

Under the no action alternative, no undertaking by FEMA and no construction would occur. There would be no change in utility use under this alternative.

Alternative 2 – Repair Alligator Drive to Pre-disaster Conditions

Under Alternative 2, repairing Alligator Drive to pre-disaster conditions would have construction related impacts on utilities because the adjacent and underneath water main pipes would be repaired once the repairs of the road begin. The impact would be minor due to construction activities.

Alternative 3 – Repair Alligator Drive with Hazard Mitigation (Preferred Alternative)

Under Alternative 3, repairing Alligator Drive with hazard mitigation protection would have construction related impacts on utilities because the adjacent and underneath water main pipes would be repaired and relocated according to the ROW once the repairs of the road begin. The contractor will coordinate with Duke Energy if any poles and/or power lines need to be removed or relocated. The impact would be minor due to construction activities and beneficial because the water mains will be relocated and protected to avoid future storm damage.

5.0 CUMULATIVE IMPACTS

Per the Council on Environmental Quality (CEQ) regulations, cumulative impacts is 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). In accordance with NEPA, this SEA considered the combined effect of the preferred alternative and other actions occurring or proposed in the vicinity of the proposed project site.

The coastal community of Alligator Point is vulnerable to damages from tropical storms and hurricanes. In the past 16 years, the area has been affected by several named storms such as Hurricane Dennis in 2005, Hurricane Gustav in 2008, Tropical Storm Debby in 2012 and most recently Hurricanes Hermine in 2016 and Michael in 2018 that have subsequently damaged different sections of Alligator Drive. Franklin County has repaired some of those sections, and in some cases, portions of the road were relocated to avoid future damages from tidal surge. Hurricane Hermine impacted an area of the road of approximately 1,000 linear feet and Hurricane Michael impacted the same section while damaging an approximately additional 160 linear feet. Alligator Drive was significantly damaged, impacting the community who depends on the access road as their sole entry and exit point for emergency evacuations as well as daily commuting to and from Alligator Point. The previous FEMA EA issued in 2017 identified cumulative impacts from Alligator Drive repairs and improvements by implementing hazard mitigation. The current proposed project identified in the EA and this SEA was expected to occur in 2018, however, the required permitting was not issued before Hurricane Michael impacted the area.

Presently the most practicable and protective measure is to repair Alligator Drive with hazard mitigation, however, the community of Alligator Point and Franklin County may have to consider other options in the future due to the repetitive nature of damages in Alligator Drive. Some of those measures may include to reconsider the relocation of the road or the construction of a bridge.

The proposed project of repairing 1,160-foot section of Alligator Drive with hazard mitigation protection which includes the elevation of the road, installation of concrete shoulders on each side of the road right-of-way, vinyl sheet on the landward side of the road, concrete sloped pavement splash pad along the coastal edge of the road, concrete class II bulkhead, steel sheet piles between the road structure and the rip rap along the coastline, and construction of stormwater treatment system, will

prevent damage from flooding and storm erosion in the near future. The project and anticipated future actions in the area will have short-term impacts to the community due to construction efforts. However, it is anticipated there will be no long-term impact to any resource and beneficial long-term impacts to the community who depends on Alligator Drive as their only access and emergency evacuation road. Based on the review conducted, when added to past, present, and reasonably foreseeable actions, the proposed action is not expected to have significant adverse cumulative impacts on any resource. The environmental protection measures that would be implemented and the obtained permits for the Proposed Action are identified in this SEA. The NEPA requirements for the Proposed Action have been fulfilled. An Environmental Impact Statement is not required and will not be prepared.

6.0 PUBLIC INVOLVEMENT

FEMA is the federal agency conducting the NEPA analysis for the repair of Alligator Drive.

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. The disaster-wide initial public notice can be accessed at <https://www.floridadisaster.org/news-media/news/20181025-dr-4399-fl-public-notice/>

The Alligator Point-Saint Teresa Association has held bi-monthly public meetings since December 8, 2018, to discuss community events as well as the proposed repairs of Alligator Drive. During the meetings the community is updated on any changes to the proposed project (Alternative 3) and the status of the project regarding FEMA funding. The community has repeatedly expressed the need and importance of the road's repairs. The community has also been informed of the proposed project and any updates through two public Facebook pages: Friends of Alligator Drive which is followed by approximately 188 people and Alligator Point Neighborhood Association-APSTA which is followed approximately 282 people.

The public will be notified of the availability of the SEA for review and comment by posting of the public notice (Appendix G). The SEA will be posted on FEMA's website, the applicant's website, and a hardcopy will be made available at the public library.

7.0 AGENCY COORDINATION

The following agencies and organizations were contacted during the preparation of this SEA:

- USFWS (Panama City Ecological Services Field Office)
- Florida Division of Historical Resources, State Historic Preservation Office
- Alabama-Quassarte Tribal Town of the Creek Nation
- Miccosukee Tribe of Indians of Florida
- Muscogee Creek Nation
- Poarch Band of Creek Indians
- Seminole Nation of Oklahoma
- Seminole Tribe of Florida

8.0 LIST OF PREPARERS

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9.0 REFERENCES

Rupert, F.R. (1993). *Geologic Map of Franklin County*. Retrieved from http://publicfiles.dep.state.fl.us/FGS/FGS_Publications/OFMS/CountyMaps/OFMS21-FRANKLIN.pdf

United States Geological Survey (USGS).(2020). Holocene sediments. Retrieved from <https://mrdata.usgs.gov/geology/state/sgmc-unit.php?unit=FLHh%3B0>

White, W.A. (1970). *The Geomorphology of the Florida Peninsula*, 2-3, 155. Retrieved from <https://ufdc.ufl.edu/UF00000149/00001/15>