



**FINDING OF NO SIGNIFICANT IMPACT**  
**SUMMERSVILLE MIDDLE SCHOOL**  
**CITY OF SUMMERSVILLE, NICHOLAS COUNTY, WEST VIRGINIA**  
**FEMA-4273-DR-WV**

**BACKGROUND**

The West Virginia School Building Authority (WVSBA), in conjunction with the Nicholas County Board of Education (NCBOE), has applied through the West Virginia Emergency Management Division (WVEMD) to the Federal Emergency Management Agency (FEMA) Public Assistance (PA) Grant Program for funding assistance, under the Presidentially Declared Disaster FEMA-4273-DR-WV.

According to the United States Geological Survey (USGS), central West Virginia experienced intense convection storms along a stationary front on June 23, 2016. The stationary movement of the storms led many areas to receive up to 10 inches of rainfall within 24 hours, producing a 1,000-year storm event. The intense rainfall resulted in widespread flash flooding crippling the state with substantial damage to residences, commercial buildings, and public infrastructure. The areas that were impacted the greatest were primarily in the Greenbrier, Elk, and Gauley River watersheds (USGS, 2016). In Nicholas County, the Gauley River watershed includes the communities of Summersville and Richwood, which were both significantly impacted by the flood event. Statewide, the flood event damaged more than two dozen schools in 10 counties, including three schools in the Gauley River Watershed of Nicholas County: Summersville Middle School, Richwood Middle School, and Richwood High School. These three schools were determined to be destroyed and, as such, they could not be repaired and were deemed eligible for replacement under the FEMA PA program. Due to the severity of the damage, an agreement between FEMA, NCBOE, and the WVSBA was signed for the reconstruction of the three damaged schools at a total combined cost of \$178 million under the Sandy Recovery Improvement Act of 2013 (SRIA). A portion of this funding will be used for the redevelopment of Summersville Middle School, while the remaining funds will be used for the redevelopment of Richwood Middle and Richwood High School. The redevelopment of Richwood Middle School and Richwood High School was addressed under a separate EA.

In accordance with 44 Code of Federal Regulations (CFR) for FEMA, Subpart B, Agency Implementing Procedures, Part 10.9, an Environmental Assessment (EA) for the redevelopment

of Summersville Middle School was prepared in 2019 pursuant to Section 102 of the National Environmental Policy Act (NEPA) of 1969, as implemented by the regulations promulgated by the President's Council on Environmental Quality (CEQ); 40 CFR Parts 1500-1508 (FEMA 2019). The purpose of the 2019 EA was to evaluate the potential environmental impacts of the Proposed Action and two alternatives. At that time, the Proposed Action consisted of reconstructing Summersville Middle School at an offsite location with expanded acreage that would allow for the development of a consolidated school complex consisting of Summersville Middle School, Nicholas County High School, and Nicholas County Career Technical Education Center, using alternative procedures under PA Section 428 authorization. The EA resulted in a Finding of No Significant Impact (FONSI) for the Proposed Action, which was issued by FEMA on December 17, 2019.

Following issuance of the FONSI and project approval by FEMA, NCBOE determined that the Proposed Action would exceed the planned project costs and revised their Proposed Action to consist of the development of a consolidated school complex comprising of Summersville Middle School, Summersville Elementary School, and Glade Creek Elementary School. The current Summersville Elementary School and Glade Creek Elementary School buildings are proposed to be decommissioned. Nicholas County High School and Nicholas County Career Technical Education Center are to remain in use at their current locations. NCBOE completed a thorough public outreach and comment period to determine the best course of action in revising their Proposed Action.

A Supplemental Environmental Assessment (SEA) was prepared in accordance with 40 CFR § 1501.5(h), which permits federal agencies to supplement EAs. This SEA provides the current description of the new revised Proposed Action and describes the expected environmental effects that differ from those anticipated under the original Proposed Action and was prepared in accordance with NEPA, 40 CFR Parts 1500-1508, and FEMA's implementing procedures for NEPA, including those in FEMA Instruction 108-1-1. As part of this NEPA review, the requirements of other environmental laws and executive orders were evaluated. FEMA opted to adopt the public outreach NCBOE completed as part of their process in creating the revised Proposed Action. This SEA informed FEMA's decision on whether to prepare an Environmental Impact Statement (EIS) or a Finding of No Significant Impact (FONSI).

Under the revised Proposed Action, Summersville Middle School would be replaced with a new facility at the Glade Creek Business Park at 395 Mable Lane, Summersville, WV 26651, the same site that was selected and cleared under the 2019 EA. This site would allow for the development of a consolidated school complex consisting of Summersville Middle School, Summersville Elementary School, and Glade Creek Elementary School. The proposed 110-acre site, selected as the most viable location based upon West Virginia Department of Education (WVDE) Policy 6200, consists primarily of gently sloping, undeveloped, cleared land outside of the SFHA. Site development would be limited to approximately 80 acres and include school structures, parking, and athletic fields. Additionally, West Virginia Route 41 (West Webster Road) would be widened to accommodate new traffic.

## **FINDINGS**

The revised Proposed Action would not impact floodplains, hazardous materials, environmental

justice, or historic and cultural resources and would not adversely impact threatened and endangered species. During construction, negligible to moderate, short-term impacts to soils and geology, water resources and water quality, air quality, noise, public service and utilities, traffic and circulation, and safety and security are anticipated. The project would be required to follow all applicable restrictions and regulations and implement best management practices (BMPs) during construction to minimize and mitigate adverse impacts to resources. The revised Proposed Action would have negligible to moderate, long-term impacts on soils and geology, water resources and quality, air quality, wetlands, terrestrial and aquatic environment, zoning and land use, noise, and traffic and circulation. The revised Proposed Action would have negligible to no impact on floodplain management, threatened and endangered species, hazardous materials, environmental justice, safety and security, and historic, archaeological, Tribal and religious sites. Implementation of mitigation procedures would minimize long-term effects to water resources resulting in minor impacts. Because frameworks are in place to manage potential environmental impacts, no significant impacts are anticipated from the incremental impact of the revised Proposed Action in combination with other past, present, and reasonably foreseeable future actions near the former school site and the site of the consolidation of Summersville Middle School and the proposed new school facilities.

## **CONDITIONS**

The following conditions must be met as part of this project. Failure to comply with these conditions may jeopardize the receipt of federal funding.

1. If deviations from the revised proposed scope of work result in substantial design changes, the need for additional ground disturbance, additional removal of vegetation, or any other unanticipated changes to the physical environment, prior to the start of work the applicant (SBA and NCBOE) must contact FEMA so that the revised project scope can be evaluated for compliance with NEPA and other applicable environmental laws.
2. The applicant is responsible for obtaining and complying with all required local, state, and federal permits and approvals.
3. Terms and conditions set by USACE and WVDEP to minimize effects to water quality will be abided by the applicant.
4. NCBOE will abide by all required Compensatory Mitigation Plans for stream impacts submitted in compliance with USACE and WVDEP.
5. Construction BMPs, as identified in the Erosion and Sedimentation Control Plan prepared for the revised Proposed Action, will be utilized and maintained throughout construction to control soil erosion and sedimentation, reduce spills and pollution, and provide habitat protection.
6. The project applicant would include BMPs during or after construction such as, but not limited to:
  - a. Soil erosion monitoring at the project site;
  - b. Installation of temporary silt fences and/or straw bales;
  - c. The staging of construction equipment in existing developed areas, such as paved parking lots;
  - d. If project activities include the stockpiling of soil or fill onsite, the project applicant would maintain these soils by covering or other means to help prevent fugitive dust and soil

- erosion and dispersion offsite into stormwater pathways or streams;
- e. All short-term soil storage would not occur within floodplain areas;
  - f. Erosion control fiber mesh would be utilized for disturbed and seeded lawn impact areas; and
  - g. Following construction, any bare or exposed soils would be vegetated to prevent future soil erosion and compacted soils would be aerated and revegetated.
7. Erosion controls will be in place prior to any ground disturbing activity.
  8. Avoided wetland and streams will be fenced during construction as no-work areas.
  9. Site soils will be covered and/or wetted during construction to minimize fugitive dust.
  10. Construction activities will be conducted during the daytime hours to reduce adverse noise impacts.
  11. All ground disturbing activities, including grading, must occur outside of a 100-foot buffer zone around the Rader Family Cemetery.
  12. The applicant will monitor ground disturbance during the construction phase; should human skeletal remains, or historic or archaeological materials be discovered during construction, all ground-disturbing activities on the project site shall cease and the applicant shall notify the coroner's office (in the case of human remains), FEMA, and the State Historic Preservation Office.
  13. Any hazardous materials discovered, generated, or used during construction would be disposed of and handled in accordance with applicable local, state, and federal regulations, with WVDEP being the lead agency regarding compliance. During all activities, appropriate measures to remove, prevent, contain, minimize, and control spills of any potentially hazardous materials will be employed. Hazardous materials would be stored in a locked, covered, facility wherever possible.
  14. Heavy machinery and equipment to be used for the Proposed Action will meet federal clean air standards. In addition, all equipment used shall have sound control devices no less effective than those provided on the original equipment. No equipment shall have un-muffled exhaust.
  15. All equipment shall comply with pertinent equipment noise standards of the U.S. Environmental Protection Agency.

## **CONCLUSION**

Based on the findings of the SEA, coordination with the appropriate agencies 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, an EIS will not be prepared (FEMA Instruction 108-1-1) and the proposed project as described in the attached SEA may proceed.

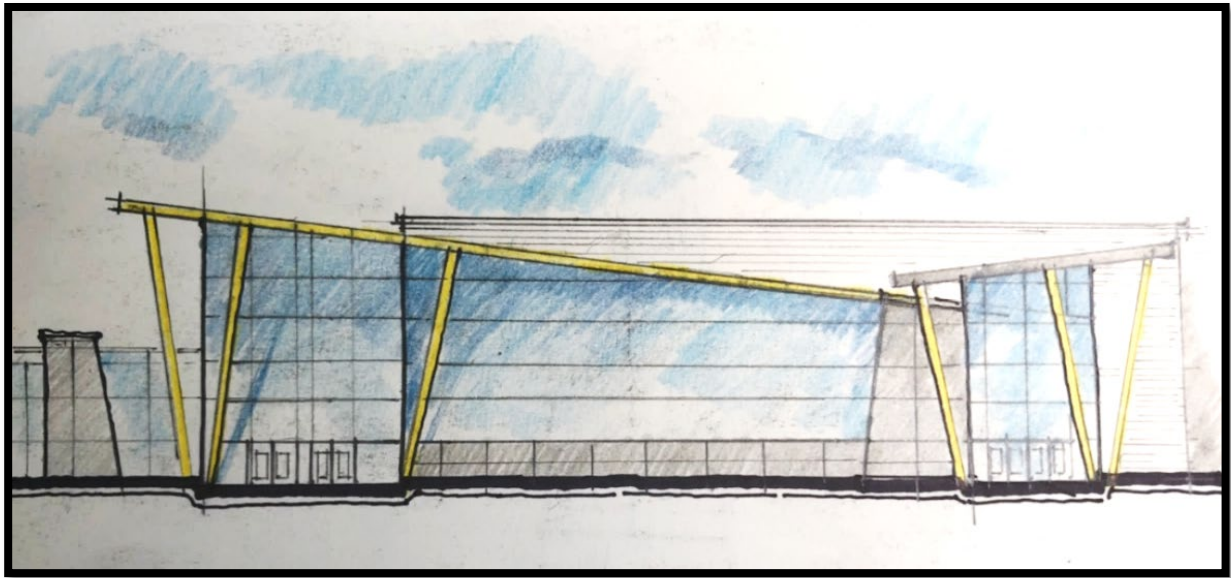
**APPROVAL**

TESSA W NOLAN Digitally signed by TESSA W  
NOLAN  
Date: 2024.11.18 14:30:07 -05'00'

Date \_\_\_\_\_

---

Tessa Nolan  
Regional Environmental Officer  
FEMA Region 3



Supplemental Environmental Assessment (SEA)

## **Summersville Middle School**

City of Summersville, Nicholas County, West Virginia

*November 2024*

*Prepared by*

FEMA Region 3, Disaster 4273

615 Chestnut Street, Sixth Floor

Philadelphia, Pennsylvania 19106



**FEMA**

## List of Acronyms and Abbreviations

APE – Area of Potential Effects	NRHP – National Register of Historic Places
ASTM – American Standard Testing Method BFE – Base Flood Elevation	NWP – Nationwide Permit (USACE)
BMP – Best Management Practice	O <sub>3</sub> – Ozone
CAA – Clean Air Act	OSHA – Occupational Safety and Health Administration
CEQ – Council on Environmental Quality CERCLA – Comprehensive Environmental Response, Compensation, and Liability Act	PA – FEMA Public Assistance
CFR – Code of Federal Regulations	Pb – Lead
CO – Carbon Monoxide	PCBs – Polychlorinated Biphenyls
CWA – Clean Water Act	PEC – Potential Environmental Concern
EA – Environmental Assessment	PM <sub>2.4</sub> and PM <sub>10</sub> – Particulate Matter
EDR – Environmental Data Resources	REC – Recognized Environmental Concern
EIS – Environmental Impact Statement	SEA – Supplemental Environmental Assessment
EO – Executive Order	SFHA – Special Flood Hazard Area
EPA – Environmental Protection Agency	SHPO – State Historic Preservation Officer
ESA – Environmental Site Assessment	SO <sub>2</sub> – Sulfur Dioxide
FEMA – Federal Emergency Management Agency	SRIA – Sandy Recovery Improvement Act
FIRM – Flood Insurance Rate Map	THPO – Tribal Historic Preservation Officer
FONSI – Finding of No Significant Impact	TMDL – Total Maximum Daily Load
FPPA – Farmland Protection Policy Act	USACE – United States Army Corps of Engineers
IPaC – Information for Planning and Consultation	USFWS – United States Department of the Interior Fish and Wildlife Service
LESA – Land Evaluation and Site Assessment LOD – Limits of Disturbance	USGS – United States Geological Survey
NAAQS – National Ambient Air Quality Standards	VOC – Volatile Organic Compounds
NCA – Noise Control Act of 1972	WVDE – West Virginia Department of Education
NCBOE- Nicholas County Board of Education	WVDEP – West Virginia Department of Environmental Protection
NEPA – National Environmental Policy Act	WVEMD – West Virginia Emergency Management Division
NFIP – National Flood Insurance Program	WVDOH – West Virginia Division of Highways
NGVD – National Geodetic Vertical Datum NHPA – National Historic Preservation Act	WVDOT – West Virginia Department of Transportation
NOI – Notice of Intent	WVSBA – West Virginia School Building Authority
NO <sub>2</sub> – Nitrogen Oxide	ZMM – ZMM Architects and Engineer
NPDES – National Pollutant Discharge Elimination System	
NRCS – Natural Resources Conservation Service	

# TABLE OF CONTENTS

SECTION ONE: BACKGROUND .....	1
1.1 Project Authority .....	1
1.2 Purpose and Need .....	2
1.3 Location and Existing Facility.....	3
SECTION TWO: PROPOSED ACTION - CONSOLIDATION OF SUMMERSVILLE MIDDLE SCHOOL, SUMMERSVILLE ELEMENTARY SCHOOL, AND GLADE CREEK ELEMENTARY SCHOOL.....	3
SECTION THREE: AFFECTED ENVIRONMENT AND CONSEQUENCES .....	5
3.1 Biological Environment.....	5
3.1.1 Threatened and Endangered Species.....	5
3.2 Socioeconomics .....	6
3.2.1 Traffic and Circulation .....	6
3.2.2 Environmental Justice (Executive Order 12898) .....	7
3.3 Historic and Cultural Resources .....	9
3.4 Climate Change and Greenhouse Gas Emissions .....	11
3.5 Summary of Environmental Impacts .....	11
SECTION FOUR: CUMULATIVE IMPACTS .....	12
SECTION FIVE: PUBLIC PARTICIPATION .....	13
SECTION SIX: MITIGATION MEASURES AND PERMITS .....	15
SECTION SEVEN: CONSULTATIONS AND REFERENCES .....	16
SECTION EIGHT: LIST OF PREPARERS.....	19
APPENDICES.....	19
Appendix A Maps and Figures.....	19
Appendix B Technical Reports .....	19
Appendix C Agency Correspondence.....	19
Appendix D Public Notice .....	19
Appendix E Public Comments .....	19



## **SECTION ONE: BACKGROUND**

### **1.1 Project Authority**

The West Virginia School Building Authority (WVSBA), in conjunction with the Nicholas County Board of Education (NCBOE), has applied through the West Virginia Emergency Management Division (WVEMD) to the Federal Emergency Management Agency (FEMA) Public Assistance (PA) Grant Program for funding assistance, under the Presidentially Declared Disaster FEMA-4273-DR-WV. In accordance with 44 Code of Federal Regulations (CFR) for FEMA, Subpart B, Agency Implementing Procedures, Part 10.9, an Environmental Assessment (EA) was previously prepared in 2019 pursuant to Section 102 of the National Environmental Policy Act (NEPA) of 1969, as implemented by the regulations promulgated by the President's Council on Environmental Quality (CEQ); 40 CFR Parts 1500-1508 (FEMA 2019). The purpose of that EA was to evaluate the potential environmental impacts of the Proposed Action and two alternatives. At that time, the Proposed Action consisted of reconstructing Summersville Middle School at an offsite location with expanded acreage that would allow for the development of a consolidated school complex consisting of Summersville Middle School, Nicholas County High School, and Nicholas County Career Technical Education Center, using alternative procedures under PA Section 428 authorization.

The EA resulted in a Finding of No Significant Impact (FONSI) for the Proposed Action, which was issued by FEMA on December 17, 2019. Following issuance of the FONSI and project approval by FEMA, NCBOE determined that the Proposed Action would exceed the planned project costs and revised their Proposed Action to consist of the development of a consolidated school complex comprising of Summersville Middle School, Summersville Elementary School, and Glade Creek Elementary School. The current Summersville Elementary School and Glade Creek Elementary School buildings are proposed to be decommissioned. Nicholas County High School and Nicholas County Career Technical Education Center are to remain in use at their current locations.

This Supplemental Environmental Assessment (SEA), prepared in accordance with 40 CFR Part 1501.5(h), provides the current description of the revised Proposed Action and describes the expected environmental effects that differ from those anticipated under the original Proposed Action. Environmental factors where the effects of the revised Proposed Action are expected to be similar in extent and magnitude to those of the original Proposed Action, are not reiterated in this SEA, and include:

- Geology, Seismicity, and Soils
- Water Resources and Water Quality
- Floodplain Management (Executive Order 11988)
- Air Quality
- Terrestrial and Aquatic Environment
- Wetlands
- Hazardous Materials
- Zoning and Land Use
- Noise
- Public Services and Utilities
- Safety and Security

Environmental factors that are expected to be affected differently by the revised Proposed Action compared to the original Proposed Action, and which are analyzed in this document, include:

- Threatened and Endangered Species
- Traffic and Circulation
- Environmental Justice (Executive Order 12898)
- Historic and Cultural Resources
- Climate Change (added section)

A description of the No Action Alternative and Alternative 3 (Redevelopment of Summersville Middle School) and their expected environmental effects are not included in this document as there have been no changes from what was detailed in the original EA (FEMA 2019). This SEA provides a tiered review from the original EA for the revised Proposed Action (Alternative 2).

This SEA is being prepared in accordance with the FEMA Instruction 108-1-1 and the DHS Instruction 023-01-001-01, pursuant to Section 102 of the National Environmental Policy Act of 1969 (NEPA), as implemented by the regulations promulgated by the President's Council on Environmental Quality (CEQ) (40 Code of Federal Regulations [CFR] Parts 1500-1508). This SEA supplements the existing EA dated December 2019 and evaluates the potential impacts of the revised Proposed Action on the physical and human environment. The results of this SEA will be used to determine whether to initiate preparation of an Environmental Impact Statement (EIS) or to prepare a Finding of No Significant Impact (FONSI).

## **1.2 Purpose and Need**

According to the United States Geological Survey (USGS), central West Virginia experienced intense convection storms along a stationary front on June 23, 2016. The stationary movement of the storms led many areas to receive up to ten inches of rainfall within a twenty-four-hour period creating a 0.1% annual chance storm (1,000-year storm event). The intense rainfall resulted in widespread flash flooding crippling the state with 23 fatalities, intense damage and/or destruction of residences, homes, commercial buildings, and public infrastructure. The areas that were impacted the greatest were primarily in the Greenbrier, Elk, and Gauley River watersheds (USGS, 2016). In Nicholas County, the Gauley River watershed includes the communities of Summersville and Richwood, each of which were significantly impacted by the flood event.

Statewide, floodwaters damaged more than two dozen schools in ten counties, including three schools in the Gauley River Watershed of Nicholas County: Summersville Middle School, Richwood Middle School, and Richwood High School. These three schools were determined to be destroyed and, as such, they could not be repaired and were deemed eligible for replacement under the FEMA PA program.

Due to the severity of the damage, an agreement between FEMA, NCBOE, and the WVSBA was signed for the reconstruction of the three damaged schools at a total combined cost of \$178 million under the Sandy Recovery Improvement Act of 2013 (SRIA). SRIA was implemented by President Barack Obama as a legislative modification to change the flexibility of how FEMA can allocate Federal funding for Federal disaster assistance to survivors. Specifically, the law adds Section 428, which authorizes alternative procedures for the PA program under sections 403(a)(3)(A), 406, 407 and 502(a)(5) of the Stafford Act. Section 428 goals include reducing the costs to the Federal Government of providing Public Assistance, increasing flexibility in the administration of such assistance, expediting the provision of assistance to a State, tribal or local government, or nonprofit owner or operator of a private nonprofit facility, and providing financial incentives and disincentives for timely and cost-effective completion of projects with such assistance. On September 4, 2018, WVSBA, NCBOE, WVEMD, and FEMA signed the Nicholas County Alternative Procedures Pilot Program Section 428 Agreement, which accepted a fixed

estimate in the amount of \$177,513,528. A portion of this funding will be used for the redevelopment of Summersville Middle School, while the remaining funds will be used for the redevelopment of Richwood Middle School and Richwood High School. The original 2019 EA and this supplemental EA address the replacement of Summersville Middle School only and does not address the construction in Richwood. The redevelopment of Richwood Middle School and Richwood High School is addressed under a separate EA.

Due to a combination of factors, including decreased enrollment due to population declines, WVSB and NCBOE have elected to pursue the consolidation of several facilities onto one campus, with the replacement of Summersville Middle School being among them. As part of the planned consolidation, Summersville Middle School, Summersville Elementary School, and Glade Creek Elementary School will be combined into a PK-8 School and co-located on the same campus. The purpose of the planned consolidation is to lower operating costs for the schools in Nicholas County, while providing state of the art learning facilities that will serve the current student bodies attending Summersville Middle School, Summersville Elementary School, and Glade Creek Elementary School. The planned construction is eligible for FEMA-funded cost share, based upon the above-mentioned agreement. This project is necessary to provide permanent learning facilities for the middle-school aged population in a significant portion of Nicholas County.

In accordance with Federal laws and FEMA regulations, the EA process for a proposed federal action must include an evaluation of viable alternatives and a discussion of the potential environmental impacts. This SEA was prepared in accordance with FEMA's regulations as required under NEPA due to revision of the original Proposed Action documented in the 2019 EA. As part of this NEPA review, the requirements of other environmental laws and executive orders are addressed.

### **1.3 Location and Existing Facility**

The project is located in the City of Summersville, Nicholas County, West Virginia. According to the United States Census Bureau's 2017 Population Estimates, Summersville has a population of 3,361, with a predominantly middle-class, English-speaking demographic. The city is situated centrally within Nicholas County and approximately seventy miles east of Charleston, West Virginia. A general location map of Summersville is provided in **Appendix A**.

The Summersville Middle School was irreparably damaged following the June 2016 event and was demolished in early 2017. Summersville Middle School is currently operating out of 56 temporary classroom units, located on the damaged school property. The temporary classroom facilities are situated on the north central extent of the subject property, between the site of the former Summersville Middle School and current Nicholas County High School and outside of the Special Flood Hazard Area (SFHA). The redevelopment of Summersville Middle School is needed to provide adequate middle school classroom education by providing a permanent facility that is safe, accessible, and meets all applicable codes and educational standards.

## **SECTION TWO: PROPOSED ACTION - CONSOLIDATION OF SUMMERSVILLE MIDDLE SCHOOL, SUMMERSVILLE ELEMENTARY SCHOOL, AND GLADE CREEK ELEMENTARY SCHOOL**

To determine a path forward for Summersville Middle School following the 2016 flood event, several options were evaluated including no action, new development offsite, and redevelopment on-site. A

large focus was on finding an alternative location that would allow for new development of the school offsite, outside of the SFHA. Selection of possible site locations was pursuant to West Virginia Department of Education (WVDE) Policy 6200, which provides a comprehensive outline of considerations for site selection. The selection process required the cooperative effort of the county board, central office and school staff, planning committee, architect, and legal consultants. NCBOE solicited community involvement through community meetings, local news outlets, and correspondence with community officials. Offsite selection criteria included, but was not limited to, development costs, availability of utilities, transportation and access to main transportation routes, attendance demographics, distance, traffic congestion, floodplain designation, proximity to hazardous contaminants, proximity to utility transmission lines, and acreage. A description of previous alternatives analyzed for this project can be found in the original EA (FEMA 2019). This SEA supplements the original EA dated December 2019 and evaluates the potential impacts of the revised Proposed Action on the physical and human environment. Henceforth, the revised Proposed Action will be referred to as the Proposed Action in this SEA.

Under the Proposed Action, the consolidation of the Nicholas County Schools will occur at a location outside of the SFHA. The Proposed Action site is located at the Glade Creek Business Park at 395 Mable Lane, Summersville, WV 26651, the same site that was selected and cleared under the 2019 EA. The site is primarily located in a rural area, approximately three miles away from the former site of Summersville Middle School. The subject property is comprised of approximately 110 acres of largely undeveloped and cleared land that is gently sloping. Glade Creek Business Park was selected as the most viable location under the Proposed Action based upon WVDE Policy 6200 which provides a comprehensive outline of considerations for site selection. NCBOE has proposed to reconstruct the school at said offsite location with expanded acreage to allow for the development of a consolidated school complex, using 428 funds, consisting of Summersville Middle School, Summersville Elementary School, and Glade Creek Elementary School.

The current Summersville Elementary School is located at 108 McKees Creek Road, Summersville, WV 26651, approximately 5.5 miles from the proposed consolidated school complex. Glade Creek Elementary School is located at 7950 W Webster Road, Summersville, WV 26651, approximately one mile from the proposed consolidated school complex. **Appendix B** includes information that describes the existing facilities, student populations, educational plan, community information, and student enrollments. At this time, the NCBOE has not formalized any plans related to the decommissioning of these two elementary schools. In accordance with West Virginia Code § 1-5-3, the NCBOE is currently evaluating the deeds of both schools to ensure the most appropriate action for the facilities after they are decommissioned. Possibilities include selling, donating, and/or reuse within the school system.

Coordinates for the center of the proposed consolidated school complex (38.323089, -80.807219), are noted in the map provided in **Appendix A**. A street map depicting the subject property and property boundary map with Limits of Disturbance (LOD) are represented in **Appendix A**. The acreage provided at the Glade Creek Business Park is large enough to accommodate the proposed consolidated complex, including any associated extracurricular activities, parking, and ease of ingress and egress to the site. The site location is three miles from the current Summersville Middle School.

A preliminary layout shown in **Appendix A** indicates that the complex will impact approximately 80 acres. The site size guidelines are outlined in WVDE Policy 6200 and the site is large enough to accommodate all required amenities for a consolidated Pre-K – 8 grade school. Currently, the applicant anticipates the consolidated school to be a 143,156 square foot building. The parking would be

calculated based off the student enrollment and school activities, as outlined in WVDE Policy 6200. Glade Creek Business Park is primed for development and has basic utilities, roads, sediment control and stormwater controls on site. As part of the design phase, considerations are being given to minimize environmental and cultural resource impacts to the maximum extent possible. All activities needed to construct the new facility will take place within the identified limits of disturbance. It is anticipated that earth-moving heavy equipment would be utilized, such as, but not limited to: excavators for material handling, trenching, foundations, rough grading, and heavy lifting; backhoe loaders for digging and minor grading; bulldozers for earth moving grading activities; skid-steer loaders for moving material throughout jobsite; trenchers; and common dump trucks to transport large amounts of material throughout the jobsite. Trenching on the jobsite would be anticipated to be minimal as Glade Creek Business Park is already developed with access to common utilities.

A roadway improvement project consisting of modifications to Route 41 will be required to accommodate new traffic. This development will consist of widening the existing roadway and adding turn lanes to safely accommodate the influx of traffic. The roadway improvements are to be conducted entirely by the West Virginia Division of Highways (WVDOH). Additional discussion of the road improvements can be found in **Section 3.4.4 Traffic and Circulation**.

## **SECTION THREE: AFFECTED ENVIRONMENT AND CONSEQUENCES**

### **3.1 Biological Environment**

#### **3.1.1 Threatened and Endangered Species**

Section 7 of the Endangered Species Act requires any Federal agency that funds, authorizes, or carries out an action ensure that their action is not likely to jeopardize the continued existence of any endangered or threatened listed species or result in the destruction or adverse modification of designated critical habitats.

#### ***Proposed Action – Consolidation of Summersville Middle School, Summersville Elementary School, and Glade Creek Elementary School***

An Official Species List from the United States Fish and Wildlife Service’s (USFWS) Information for Planning and Consultation (IPaC) tool, dated February 8<sup>th</sup>, 2019, revealed that the project is located within a potential area of occurrence for ten threatened and endangered species (**Appendix C**). Several species that were returned on the Official Species List IPaC report were immediately removed from consideration after validating the report against the “Status and Distribution of Threatened and Endangered Species” document on the USFWS West Virginia Field office website. The USFWS determined that three federally listed species could occur in the project area and may be affected by project construction. According to the February 2019 Official Species List IPaC report, these species included the endangered Virginia Big-Eared Bat (*Plecotus townsendii virginianus*); the threatened Northern Long-Eared Bat (*Myotis septentrionalis*); and the endangered Indiana Bat (*Myotis sodalis*). There is no designated critical habitat.

In a Section 7 consultation letter, dated February 19, 2019, FEMA determined that the proposed project *may affect, but is not likely to adversely affect* the Indiana Bat, Virginia Big-Eared Bat, and the Northern Long-Eared Bat. Any take of Northern long-eared bat associated with this project is exempted under the 4(d) rule, and no conservation measures are required. USFWS concurred with this determination on March 27, 2019.

On May 24, 2019, FEMA informed USFWS of two additions to the previously provided designs for the project site, which included a secondary access road and a separate but connected action of widening West Virginia Route 41. USFWS responded on June 14, 2019, with a letter for the modification to the project stating that USFWS's analysis of effects to federally listed species did not change, and the previous concurrence was still valid.

On December 29, 2021, FEMA reinitiated the consultation with USFWS due to additional changes to the proposed project scope of work that includes approximately 6.8 acres of additional ground disturbance, including 3 acres of tree removal. USFWS responded on May 13, 2022, indicating that their previous concurrence was still applicable.

On May 16, 2024, an updated Official Species List was requested through the USFWS's IPaC tool, which revealed that the project is located within a potential area of occurrence for ten threatened and endangered species. The Northeast Endangered Species and the Northern Long-Eared Bat Rangelwide Determination Keys were used to streamline review of the project. The Determination Keys resulted in a 'may affect' determination for the endangered Indiana Bat and the now endangered Northern Long-Eared Bat, and a 'no effect' determination for the remaining eight threatened and endangered species. There is no designated critical habitat.

FEMA, on May 16, 2024, reinitiated consultation with USFWS with the updated Official Species List and included additional changes to the project directly related to this SEA, including a reduction of parking, additional storm drainage, modifications to the loop road around the building, changes to locations of utility entrances to the building, exterior lighting, and siting of athletic field amenities associated with elementary and middle schools. All activities related to this SEA are anticipated to be contained within the original LOD and exterior lighting is anticipated to be less than the original design. USFWS responded on May 29, 2024, indicating that the previous concurrence of *may affect, but is not likely to adversely affect* the listed species (the Indiana Bat and Northern Long-Eared Bat) are still applicable. Please see relevant correspondence and the latest consultation letter attached in **Appendix C**.

## **3.2 Socioeconomics**

### **3.2.1 Traffic and Circulation**

The WVDOH via West Virginia Department of Transportation (WVDOT) is responsible for planning, engineering, right of acquisition, construction, redevelopment, traffic regulation and maintenance of state roads, highways, and a portion of federal roads within West Virginia's boundaries. Arterials, connectors, rural roads, local roads, and county roads are constructed and maintained by county or city governments.

#### ***Proposed Action – Consolidation of Summersville Middle School, Summersville Elementary School, and Glade Creek Elementary School***

In April 2019, a Traffic Impact Study was completed by A. Morton Thomas and Associates, Inc. (ATM) for the original Proposed Action for the consolidated Summersville Middle School, High School, and Technical Education Center as documented in the 2019 EA. As the Proposed Action now consists of the consolidation of the Summersville Middle School, Summersville Elementary School, and Glade Creek Elementary School, reevaluation of the original Traffic Impact Study was warranted. The Nicholas County Board of Education had confirmed that the previous Traffic Impact Study is still applicable to the Proposed Action. The facility is proposed to be served by four driveways connected to Trade Zone Drive. Three driveways will be full movement with one driveway designated as ingress only. All school

traffic will enter West Webster Road via Trade Zone Drive with the proposed driveways operating under stop control.

The study indicates that the traffic generated by the Proposed Action will have a substantial impact on the existing circulation along Trade Zone Drive, West Webster Road, and other surrounding areas. The full traffic study report completed by ATM can be found in **Appendix B**. Roadway improvement recommendations for West Webster Road, (WV 41) and US Route 19 are included in the full traffic study, to mitigate the impact of the new trips and reduce the impact to the level of service. All traffic improvements along WV 41 and Route 19 would occur within the study area of the proposed site and/or within current rights of way that has been established by the West Virginia Department of Highways. Following the recommended improvements from the traffic study, impacts to the surrounding environment will be moderate in the short-term during construction and determined to be minor, long term.

### **3.2.2 Environmental Justice (Executive Order 12898)**

EO 12898 (Environmental Justice in Minority Populations and Low-Income Populations) mandates that Federal agencies identify and address, as appropriate, disproportionately high, and adverse human health or environmental effects of their programs, policies, and activities on minority and low-income populations.

Using demographic indicators, environmental justice populations are defined using the following criteria:

- The minority or low-income population of the affected environment equals or exceeds the 50th percentile compared to the statewide average.
- One or more of the EJ indexes in the affected environment equals or exceeds the 80th percentile compared to the statewide average.

According to the EPA's EJScreen Tool, the population of Summersville, WV is in the 22nd percentile of minority persons and in the 69th percentile of low-income persons as compared to the state averages. There is more than one EJ index in the affected environment equal to or exceeding the 80th percentile compared to the statewide average. Nicholas County, WV is in the 41st percentile of minority persons and in the 61st percentile of low-income persons as compared to the state averages. The county does not have any EJ indexes equal to or exceeding the 80th percentile compared to the statewide average. Based on this data, the current minority populations of Summersville and the county are not at a level for the communities to be considered a minority population under FEMA's current EO 12898 guidance. The data though shows that the population of both Summersville and the county are considered a low-income population.

Additional socioeconomic and demographic data for the project area were also analyzed to determine if a disproportionate number of minority or low-income persons have the potential to be adversely affected by the proposed project. United States Census Bureau data was used to assemble the following community profiles for Nicholas County and the City of Summersville. Official 2020 Census Data was used as applicable, and additional information was taken from the 2018 - 2022 American Community Survey 5-year estimates. The American Community Survey 5-year estimates for the percentages of the population of the project area based on race and ethnicity are provided in **Table 1** below.

West Virginia has a population of 1,793,716, with school age children making up 20.1% of the population (2020 Census and Demographic Profile). The state population has an educational

attainment rate of 88.4% of high school graduate level or higher. The median household income is \$54,329 and 17.9% of individuals are identified as living below the Federal Poverty Level. Of the state population, approximately 2.2% of individuals identify as being of Hispanic or Latino origin. Most of the population identifies as white, with 2.1% of individuals indicating they are of two or more races. Approximately 97.5% of the population is listed as English-speaking (2018 - 2022 American Community Survey 5-Year Estimate).

In comparison, Nicholas County is characterized as having a population of 24,604 with children under the age of 5 years at 4.6%, the population under 18 years at 20.2%, and the population 65 years and over at 24.5%. Nicholas County is listed with an educational attainment of high school graduate or higher of 89.1%. Most of the population, approximately 99%, is listed as English speaking. According to 2018-2022 American Community Survey 5-Year Estimates along with 2020 Demographic Profiles, the average household income is \$48,826 with 16.7% below poverty levels.

Per the 2020 United States Census Bureau and 2018-2022 American Community Survey 5-Year Estimates, Summersville is listed as having a population of 3,431 with a median household income of \$53,529 and 17.4% of all families are below the Federal Poverty Level. The median age of the city is approximately 56 years. According to 2018-2022 American Community Survey 5-Year Estimates along with 2020 Demographic Profiles, 92.3% of the population has an educational attainment of high school graduate level or higher, the number of foreign-born individuals is listed as 84, and total number of housing units is approximately 1,737.

According to 2022 estimates from the US Census Bureau, the population of the City of Summersville saw nearly a 2.31% reduction in population six years after the (2016) flooding described in this SEA. Based on American Community Survey 5-Year estimates, children under the age of 5 years old represent 4.2% of the population, ages 5 to 9 represent 5.2%, ages 10 to 14 represent 1.8%, and 15 to 19 years as 9.8%. Most of the population, approximately 97.3%, is listed as English speaking. Therefore, a non-English SEA is not warranted. However, appropriate plain language guidance should be made available if requested for limited- English speaking residents.

*Table 1 – Summary of Race and Ethnicity of Populations for West Virginia, Nicholas County, and Summersville*

<b>Race or Ethnicity</b>	<b>West Virginia</b>	<b>Nicholas County</b>	<b>City of Summersville</b>
White Alone	91.4%	96.7%	92.3%
Black or African American Alone	3.4%	0.1%	0%
American Indian and Alaska Native Alone	0.1%	0.1%	0%
Asian Alone	0.8%	0.2%	0%
Native Hawaiian and Other Pacific Islander Alone	0.0%	0%	0%
Some Other Race Alone	0.5%	0.9%	6.5%
Two or More Races	3.7%	2.0%	1.2%
Hispanic or Latino (of any race)	1.8%	1.0%	6.5%



***Proposed Action – Consolidation of Summersville Middle School, Summersville Elementary School, and Glade Creek Elementary School***

The Proposed Action will return Summersville Middle School to its pre-disaster capacity at the designated new site approximately three miles away from the previous school location. The proposed consolidated school complex is within one-mile of the Glade Creek Elementary School and approximately 5.5-miles away from the Summersville Elementary School. The Proposed Action will relocate all students, teachers, and staff to the new campus outside the SFHA to eliminate future potential flood threats. The Proposed Action will not permanently increase the number of residents in the project vicinity and is not anticipated to generate additional demand for housing or jobs. The site location and its proximity to current school locations will be beneficial to the students and surrounding community, allowing for ease of access to after school programs and extracurricular activities. The Proposed Action will not have disproportionately high and/or adverse effects on minority or low-income populations. The Proposed Action complies with EO 12898 and will not result in long-term adverse socioeconomic impacts. Positive long-term benefits of the project include providing a safer school environment for students and staff by alleviating concerns, financial burden, and service interruptions associated with potential repetitive flooding at the current Summersville Middle School location.

**3.3 Historic and Cultural Resources**

Section 106 of the National Historic Preservation Act of 1966 (NHPA), as amended, 54 U.S.C. §306108, requires Federal agencies to consider the impact an undertaking has on historic properties. The review activities required under NHPA are referred to as the Section 106 process. According to 36 CFR 60.4, historic properties are defined as districts, sites, buildings, structures, and/or objects that are listed in or eligible for listing in the National Register of Historic Places (NRHP). In accordance with the 36 CFR 800.4, Federal agencies are required to identify historic resources within an undertaking’s Area of Potential Effect (APE). As defined in 36 CFR Part 800.16(d), the APE “is the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if such properties exist.” In consultation with the appropriate State Historic Preservation Officer (SHPO) or Tribal Historic Preservation Officer (THPO), Federal agencies must evaluate the identified historic resources for NRHP eligibility and assess the potential effects to those historic properties resulting from the proposed undertaking. If the undertaking is determined to have an adverse effect on historic properties, then the agency must attempt to avoid, minimize, or mitigate that adverse effect. A summary of FEMA’s research and evaluation of historic resources affected by both the original and revised Proposed Action, as well as FEMA’s consultations with the West Virginia SHPO (WV SHPO) follows.

With regards to tribal resources, only the Catawba Nation has known cultural areas of interest in Nicholas County. FEMA consulted with the Catawba Nation in July of 2016, immediately following the disaster declaration for DR-4273-WV. At the time, the Catawba Nation of Indians did not express concerns with DR-4273-WV Public Assistance activities within the declared counties, including Nicholas County.

***Proposed Action – Consolidation of Summersville Middle School, Summersville Elementary School, and Glade Creek Elementary School***

Under the Proposed Action, NCBOE proposes to develop 110 acres of primarily undeveloped, cleared land at 395 Mable Lane, Summersville, West Virginia. A search of West Virginia SHPO’s

Interactive GIS map in the vicinity of the proposed construction site identified one previously surveyed property within the project boundaries: The Rader Farm and Homeplace (NI-0106). The property had been surveyed between 2005 and 2007, during which time development of a business park, known as Glade Creek Business Park, was proposed for the site. Though the business park was never developed, consultation with WV SHPO determined the Rader Homestead to be ineligible for listing in the NRHP due to lack of integrity. An archaeological assessment was also conducted in 2006 and 2007 in correlation with the proposed business park. Archaeological investigations identified a secondary site, the Rader Family Cemetery (46NI657) and eventually concluded that as long as ground disturbing activities maintained a 100-foot buffer from the cemetery boundary (delineated by a chain-link fence), there would be no historic properties affected.

Regarding the original Proposed Action, in a consultation letter dated March 25, 2019, FEMA upheld the determinations of the previous historic resource surveys for the site. In response, on April 3, 2019, WV SHPO concurred with the archaeological assessment, but requested a re-evaluation of the Rader Farm and Homeplace and submission of Historic Property Inventory (HPI) forms for any properties 45 years or older within the viewshed of the proposed school development. FEMA responded on April 25, 2019, with an updated HPI form for the Rader Farm and Homeplace as well as identification of three nearby properties: 84 Mabel Lane, 205 Trade Zone Drive, and 7329 Webster Road. None of these three properties were over 45 years of age and therefore did not merit evaluation for listing in the NRHP. FEMA upheld the determination that the Rader Farm and Homeplace was ineligible for listing in the NRHP as its integrity had further deteriorated due to neglect and vandalism. Therefore, the original Proposed Action would have no effect on historic properties. WV SHPO concurred with FEMA's determination on May 7, 2019.

Following the May 2019 SHPO concurrence, the widening of Route 41 was identified as a connected action, which was necessary to accommodate access to the proposed school facility. Though the road widening was planned by WVDOH, it is considered necessary to alleviate traffic concerns associated with the school (see Section 3.4.5 Traffic and Circulation). Because the widening is a connected action, FEMA notified WV SHPO of this ground disturbing activity on July 3, 2019, and July 29, 2019. This notification included HPI forms for properties adjacent to the roadway and an indication that WV DOH would conduct formal consultation on the ground disturbing activities in late 2019. On August 2, 2019, WV SHPO acknowledged that WV DOH would take the lead on the Route 41 widening consultation. In the same correspondence, WV SHPO maintained the April 3, 2019, concurrence determination with regards to archaeological resources: no historic properties affected.

In November 2021, NCBOE informed FEMA of additional changes to the proposed project scope of work that included approximately 6.8 acres of additional ground disturbance, necessitating the need for FEMA to reopen consultation with the WV SHPO. In a consultation letter dated January 5, 2022, FEMA upheld the previous determination of no historic properties affected. WV SHPO concurred with FEMA's determination on January 6, 2022.

In December 2023, NCBOE informed FEMA of a change to their reconstruction plans for the Summersville Middle School. Instead of a consolidated middle school, high school, and technical education center, they would move forward with a consolidated Pre-K – 8 grade school within the previously defined boundaries of the Industrial Park parcel. In conjunction with the revised construction proposal, the applicant informed FEMA that two elementary schools will be

decommissioned once the new consolidated school is complete: Summersville Elementary School and the Glade Creek Elementary School. The change to the scope of work necessitated FEMA to reopen consultation with the WV SHPO for the revised Proposed Action.

A search of WV SHPO's Interactive GIS map showed that both school properties have been previously surveyed. The Summersville Elementary School (NI-0005-0149\_Rev01) was surveyed in 1991 and then updated in 2000. The WV SHPO determined the property ineligible for listing in the NRHP. The Glade Creek Elementary School (NI-0295\_Rev01) was surveyed in 2020 and determined ineligible for listing in the NRHP. In accordance with Section 106 of the NHPA, FEMA re-evaluated both properties for historic significance and potential effects as part of this SEA. Neither property was determined eligible for listing in the NRHP.

In a consultation letter dated June 24, 2024, FEMA upheld the previous determination of no effect to historic properties at the property site on Marble Lane, as the new construction plan is within the previously defined boundaries of the level of disturbance. In relation to the decommission of the elementary schools, FEMA determined no effect to historic properties, as both schools were determined not eligible for listing in the NRHP. WV SHPO concurred with FEMA's determination on July 19, 2024.

This concluded the Section 106 Process for the Proposed Action Alternative. Copies of correspondence between FEMA and West Virginia SHPO (including HPI forms) can be found in **Appendix C** of this report.

### **3.4 Climate Change and Greenhouse Gas Emissions**

"Climate change" refers to changes in the Earth's climate caused by a general warming of the atmosphere. Its primary cause is emissions of greenhouse gases (GHGs), including carbon dioxide and methane. Climate change can affect species distribution, temperature fluctuations, and weather patterns. The Council on Environmental Quality (CEQ) Interim NEPA Guidance on Consideration of Greenhouse Gas Emissions and Climate Change (CEQ 2023) suggests that a quantitative GHG analysis should be done, where feasible. Annual GHG emissions increases or reductions, as well as net GHG emissions over the projected lifetime of the action, consistent with existing best practices, should be presented as part of the analysis of the proposed action's climate change effects under NEPA.

Under the Proposed Action, minor, short-term impacts to air quality will occur during construction activities. To reduce impacts, the construction contractors will be required to wet down construction areas as needed to mitigate fugitive dust. Emissions from fuel-burning engines (e.g. heavy machinery and earthmoving machinery) could also temporarily increase the levels of some of the criteria pollutants, such as CO, NO<sub>2</sub>, O<sub>3</sub>, PM<sub>10</sub>, and noncriteria pollutants such as VOCs. To mitigate these emissions, BMPs will be used such as keeping run times for fuel burning equipment to a minimum and proper maintenance of equipment. Due to the development's size, anticipated grading impact, and availability of debris recycling or disposal facilities, Air Quality Permitting through WVDEP is not anticipated. Long-term impacts to local air quality and greenhouse gas emissions near the school site, including from increased traffic and utility usage, will be negligible.

### **3.5 Summary of Environmental Impacts**

The impacts from the Proposed Action include changes to land use, minor short-term impacts from construction activities, and minimal long-term impacts to farmland, water resources, and the floodplain. The following table summarizes the potential impacts analyzed for the Proposed Action and includes potential impacts identified in the original EA (FEMA 2019) and this SEA.

**Table 2 – Summary of Environmental Impacts**

<b>Affected Environment</b>	<b>Proposed Action</b>
<b>Soils and Geology</b>	Moderate short-term and long-term. Meets FPPA compliance requirements
<b>Water Resources and Water Quality</b>	Moderate short-term, minimal long-term.
<b>Floodplain Management</b>	No impact.
<b>Air Quality</b>	Minor short-term impacts during construction, negligible long-term impacts.
<b>Terrestrial and Aquatic Environment</b>	Minor impacts to terrestrial species and the aquatic resources.
<b>Wetlands</b>	Moderate impacts.
<b>Threatened and Endangered Species</b>	May affect, but not likely to adversely affect, listed species.
<b>Hazardous Materials</b>	No impact.
<b>Zoning and Land Use</b>	Minor impact.
<b>Noise</b>	Moderate short-term impact due to construction noise, minimal long-term impacts.
<b>Public Service and Utilities</b>	Minor short-term impact during construction, no long-term impacts.
<b>Traffic and Circulation</b>	Moderate short-term impact during construction, minor long-term impacts after roadway improvements.
<b>Environmental Justice</b>	No disproportionate and adverse effects on minority or low-income populations.
<b>Safety and Security</b>	Negligible short-term construction impacts; no long-term impacts to health and safety of children.
<b>Historic Structures</b>	No historic properties affected.
<b>Archaeological Resources</b>	No historic properties affected.
<b>Tribal and Religious Sites</b>	No effect.

## **SECTION FOUR: CUMULATIVE IMPACTS**

Cumulative effects are defined by the CEQ as the impact on the environment, resulting from the incremental impacts of the evaluated actions when added to other past, present, and reasonably foreseeable future actions, regardless of the source, Federal or non-Federal. Per 40 CFR §1508.7, cumulative impacts can result from individually minor but collectively significant actions taken over time.

The City of Summersville is currently engaged in numerous flood recovery projects, funded from various Federal and state sources, as well as local and private sources. Past and present recovery activities include demolition of flood damaged residential, commercial, and public buildings, restoration of flood-impacted facilities, acquisition of residential homes from willing sellers, and mitigation of residential homes through elevation or reconstruction above BFE. These activities are being undertaken as part of the necessary recovery efforts following the 2016 flood, and focus

is being placed on reducing future risk by removing or mitigating properties in the SFHA. Acquisition of homes in the SFHA may result in some individuals moving to other communities (some of whom may have already relocated, after the 2016 flood event). Additional factors may also influence demographics, including changes to nearby employment opportunities.

Reasonably foreseeable future actions in the area include continued public and private recovery projects. Additional future land use may occur within the project area due to private development, or currently unplanned flood mitigation projects that convert developed land to open space. There is not any planned future development in the immediate area of the proposed project area. Past, present, and future actions are not expected to result in increased long-term development or population growth, as the goal is to restore pre-disaster services to the community.

As noted in Section 1: Background, FEMA has drafted this SEA to document the revised Proposed Action and describe the expected environmental effects that differ from those anticipated under the original Proposed Action. FEMA has determined that several Environmental factors of the current Proposed Action are expected to be similar in extent and magnitude to those of the original Proposed Action. This SEA reanalyzed several Environmental factors that are expected to be affected differently by the revised Proposed Action compared to the original Proposed Action.

This SEA concludes that the long-term impacts of the proposed action will consist of minor to negligible impacts to soils, water resources, terrestrial and aquatic environments, and floodplains. Moderate short-term impacts to noise and traffic are anticipated. In addition, there may be moderate short-term impacts to water quality and soils during construction. The other activities described above affecting the same area could also impact these resources. Impacts from other projects to soils will be minimized using Erosion and Sedimentation Control Plans. Projects proposed in the floodplain are managed through the requirement to obtain permits from the local floodplain manager and projects proposed to impact waterways require permits through WVDEP and USACE. Because frameworks are in place to manage potential environmental impacts, no significant impacts are anticipated from the incremental impact of the proposed action in combination with other past, present, and reasonably foreseeable future actions near the former school site and the site of the consolidation of the Summersville and proposed new school facility.

## **SECTION FIVE: PUBLIC PARTICIPATION**

In 2018, prior to the start of the formal federal NEPA process, the selection of a site to construct the new Summersville Middle School was the focus of both City and County public meetings. Coordination with FEMA and public involvement were conducted throughout the NEPA EA process. Public involvement included Nicholas County public meetings, NCBOE meetings, and town hall meetings to establish an open discussion with the surrounding community. Throughout the process representatives from state, local, and Federal agencies, state and Federal Representatives, politicians, local community, and schools participated in the public comment process.

The NEPA process requires that opportunities be provided for public review and comment. During the development of the original EA (FEMA 2019), NCBOE advertised the Draft EA for the relocation and development of Summersville Middle School, Nicholas County High School, and Development of a Technical Education Facility as per NEPA requirements. The 30-day comment period began on October

16, 2019, and lasted 30 days from the date of advertisement in the *Nicholas Chronicle* Newspaper, until November 15, 2019. The Draft EA Document was made available at the Summersville Public Library and posted online at the FEMA website at <https://www.fema.gov/disaster/4273>. Comments were submitted by email to [FEMA-R3-EHP-PublicComment@fema.dhs.gov](mailto:FEMA-R3-EHP-PublicComment@fema.dhs.gov) or by mail, addressed to FEMA Region III, Disaster 4273, 615 Chestnut Street, Sixth Floor Philadelphia, PA 19106, ATTENTION: NCBOE Summersville NEPA Comments. A public meeting on the Draft Environmental Assessment was held October 21, 2019, from 6 p.m. to 8 p.m. at Nicholas County High School, located at 30 Grizzly Ln, Summersville, WV 26651. The meeting provided an overview of the Draft Environmental Assessment and allowed an in-person opportunity to submit public comments and ask questions. 48 public comments were received during the public comment period. Substantive comments received during the public comment period were addressed as appropriate in the final document. In addition to FEMA and NCBOE's efforts, USACE issued a Public Notice comment period for the Section 404 permit application submitted for the project on June 10, 2019. WVDEP issued a Public Notice comment period for Section 401 permit application on July 25, 2019. The original EA (FEMA 2019) resulted in a Finding of No Significant Impact (FONSI) for the Proposed Action, which was issued by FEMA on December 17, 2019.

On May 16, 2023, NCBOE received bid results for the Proposed Action of the original EA (FEMA 2019). After an evaluation of all applicable costs/fees for this Project (including soft costs and anticipated costs for those project components that did not receive bids), the original Proposed Action exceeded the planned project costs. As a result of this budget deficit, representatives of the Board and its consultants met with SBA and FEMA on June 2, 2023, and June 6, 2023. The purpose of these meetings was to discuss potential alternatives for the original Proposed Action to address budget deficits and the constraints.

At the conclusion of the meeting on June 6, 2023, FEMA agreed to allow the Board to prepare alternate construction proposals for FEMA's review and comment. As a result of these discussions with SBA and FEMA, the Board held a public working session on June 9, 2023. During this working session the Board and its consultants discussed alternative construction proposals that could be presented to SBA, WVEMD, and FEMA. Per the discussion during this working session, the Board and its consultants have prepared the below formal proposals for SBA, WVEMD, and FEMA's review and comment, which were approved for submittal to SBA, WVEMD, and FEMA, by a public meeting of the Board on July 5, 2023.

On July 5, 2023, the NCBOE voted to submit three (3) alternate construction proposals to FEMA related to the original Proposed Action. Development and submission of these alternate construction proposals was necessary due to budgetary shortfalls that have prevented the Board from proceeding with the Project as previously proposed. On August 16, 2023, the Board received FEMA's tentative approval of the three proposals subject to the Board's satisfaction of certain programmatic policy requirements and FEMA's approval of a revised Scope of Work. Having received FEMA's tentative approval of the three proposals, the NCBOE worked towards the selection of an alternate construction plan and prepared to submit the required Scope of Work change request to FEMA. The first step in this process was to engage in community outreach regarding each proposal.

NCBOE published a thirty (30) day public comment period to accept comments on each of the three proposals and held two (2) public listening sessions to allow the community to voice their comments on each proposal. Comments were accepted until midnight on September 30, 2023. Public comments

could be submitted online or during the public listening sessions. The first public listening session was held on September 5, 2023, from 4 – 6 p.m. The second listening session was held on September 18, 2023, from 4-6 p.m. Each listening session was held at the Board’s office, 400 Old Main Dr., Summersville, WV, 26651.

Following the thirty (30) day public comment period and the two (2) public listening sessions, the NCBOE reviewed all submitted comments received during the public comment period. NCBOE considered all comments, statements, and positions presented during this public comment period even if a specific response is not provided below. 20 public comments were received during the public comment period. Substantive comments received during the public comment period were addressed as appropriate. After review and consideration of all comments received, NCBOE held public meetings on October 12, 2023 and October 16, 2023, to select the alternate construction proposal. The NCBOE voted to select one proposal, which is the construction of the revised Proposed Action, and based on feedback from the public comment period NCBOE selected to decommission Glade Creek Elementary and Summersville Elementary.

As outlined in Section V, Part C (5), of the DHS Instruction 023-01-001-01, pursuant to Section 102 of the National Environmental Policy Act of 1969 (NEPA), DHS components have discretion regarding the type and level of public involvement for SEAs using factors outlines in Section ICV, Part G (1). Given the type and level of public involvement completed by NCBOE (i.e., 30-day public comment period, two listening sessions, and public meetings) in engaging the community in alternate proposals and in choosing the alternate construction proposal, FEMA has opted to adopt the public involvement as part of the process for finalizing the SEA. FEMA will complete no further public involvement, as the actions completed by NCBOE are sufficient due to the limited changes in the Proposed Action. The original EA (FEMA 2019) public involvement documents, as well as NCBOE’s summary of their public outreach and involvement, and a Response to Comments Document was generated and included into the updated report, as **Appendix E**. The original Public Notice is attached to **Appendix D**.

## **SECTION SIX: MITIGATION MEASURES AND PERMITS**

- The applicant is responsible for obtaining and complying with all required local, state, and Federal permits and approvals.
- Terms and conditions set by USACE and WVDEP to minimize effects to water quality will be abided by the applicant.
- NCBOE will abide by all required Compensatory Mitigation Plans for stream impacts submitted in compliance with USACE and WVDEP.
- Construction BMPs, as identified in the Erosion and Sedimentation Control Plan prepared for the proposed action, will be utilized and maintained throughout construction to control soil erosion and sediment, reduce spills and pollution, and provide habitat protection.
- The project applicant would include BMPs during or after construction such as, but not limited to:
  - Soil erosion monitoring at the project site;
  - Installation of temporary silt fences and/or straw bales;
  - The staging of construction equipment in existing developed areas, such as paved parking lots;
  - If project activities include the stockpiling of soil or fill onsite, the project applicant would maintain these soils by covering or other means to help prevent fugitive dust and soil erosion and dispersion offsite into stormwater pathways or streams;
  - All short-term soil storage would not occur within floodplain areas;

- Erosion control fiber mesh would be utilized for disturbed and seeded lawn impact areas; and
- Following construction, any bare or exposed soils would be vegetated to prevent future soil erosion and compacted soils would be aerated and revegetated.
- Erosion controls will be in place prior to any ground disturbing activity.
- Avoided wetland and streams will be fenced during construction as no-work areas.
- Site soils will be covered and/or wetted during construction to minimize fugitive dust.
- Construction activities will be conducted during the daytime hours to reduce adverse noise impacts.
- All ground disturbing activities, including grading, must occur outside of a 100-foot buffer zone around the Rader Family Cemetery.
- The applicant will monitor ground disturbance during the construction phase; should human skeletal remains, or historic or archaeological materials be discovered during construction, all ground-disturbing activities on the project site shall cease and the applicant shall notify the coroner's office (in the case of human remains), FEMA, and the SHPO.
- Any hazardous materials discovered, generated, or used during construction would be disposed of and handled in accordance with applicable local, state, and Federal regulations, with WVDEP being the lead agency regarding compliance. During all activities, appropriate measures to remove, prevent, contain, minimize, and control spills of any potentially hazardous materials will be employed. Hazardous materials would be stored in a locked, covered, facility wherever possible.
- Heavy machinery and equipment to be used for the proposed action will meet Federal clean air standards. In addition, all equipment used shall have sound control devices no less effective than those provided on the original equipment. No equipment shall have un-muffled exhaust.
- All equipment shall comply with pertinent equipment noise standards of the EPA.
- If deviations from the proposed scope of work result in substantial design changes, the need for additional ground disturbance, additional removal of vegetation, or any other unanticipated changes to the physical environment, prior to the start of work the applicant (SBA and NCBOE) must contact FEMA so that the revised project scope can be evaluated for compliance with NEPA and other applicable environmental laws.

## **SECTION SEVEN: CONSULTATIONS AND REFERENCES**

Environmental Laboratory. 1987. Corps of Engineers Wetland Delineation Manual, Technical Report Y-87-1.

Federal Emergency Management Agency (FEMA). 2019. *Environmental assessment for Summersville*. U.S. Department of Homeland Security. Retrieved from <https://www.fema.gov/emergency-managers/practitioners/environmental-historic/nepa/environmental-assessment-summersville>

Jenkins, Anthony L. Ph.D. April 27, 2017. Public Notice addressed to the students, faculty, staff and Alumni.

Munsell. 1992. Soil color charts. Macbeth/Kollmorgan Instruments. Newburgh, NY.

Reed, P. B. 1988. National list of plant species that occur in wetlands: Northeast (Region 1). U.S. Fish and Wildlife Service, Biological Report 88(26.1). 111 pp.



Site Photographs taken during site visit.

U.S. Army Corps of Engineers, Waterways Experiment Station. Vicksburg, Mississippi. 100 p. plus appendices.

U.S. Census Bureau, <https://data.census.gov/>

U.S. Department of Agriculture. 1991. Hydric Soils of the United States. USDA-Soil Conservation Service. Washington, D.C.

U.S. Department of Agriculture, Web Soil Survey. 1996. Soil Survey of Kanawha County, West Virginia. <http://websoilsurvey.nrcs.usda.gov/app/>.

U.S. Environmental Protection Agency (EPA)

U.S. EPA, April 10, 2008. Federal Register, Volume 73, Number 70, Rules and Regulations, Washington, D.C.

U.S. Fish and Wildlife Service (USFWS). 2017.

U.S. Fish & Wildlife Service, Wetlands Mapper. National Wetlands Inventory. <http://www.fws.gov/wetlands/Data/Mapper.html>.

U.S. Geological Survey (USGS). 2006. Ground Water Atlas of the United States, Delaware, Maryland, New Jersey, North Carolina, Pennsylvania, Virginia, West Virginia HA 730-L. [http://pubs.usgs.gov/ha/ha730/ch\\_1/index.html](http://pubs.usgs.gov/ha/ha730/ch_1/index.html)

USGS 7.5-Minute Topographic Quadrangle Map

West Virginia Department of Arts, Culture, and History

West Virginia Department of Environmental Protection-Division of Air Quality

West Virginia Department of Natural Resources

West Virginia Wildlife Diversity Program

West Virginia National Heritage Program

West Virginia Department of Wildlife

West Virginia Division of Highways

West Virginia Division of Transportation

Pertinent and available local, state, and Federal government listing of recognized environmental conditions were reviewed for evidence of activities, which may have an adverse impact on the subject property. Some of those agencies/listings and the databases searched by EDR include the following:

- US Environmental Protection Agency (USEPA);
- West Virginia Department of Environmental Protection (WVDEP);
- Division of Water Resources (DWR);
- National Priorities List (NPL);
- Proposed National Priority List sites;
- National Priority List Deletions (Delisted NPL);
- Federal Superfund Liens (NPL Liens);
- active Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS);
- CERCLIS No Further Remedial Action Planned sites (CERC-NFRAP);
- Corrective Action Report sites (CORRACTS);
- Resource Conservation and Recovery Information System (RCRIS) databases including the Treatment, Storage and Disposal Facility (TSD) list and large and small quantity generator list (LQG/SQG) sites;
- Emergency Response Notification System (ERNS);
- Hazardous Materials Information Reporting System (HMIRS);
- Engineering Controls Sites List (US ENG CONTROLS);
- sites with Institutional Controls (US INST CONTROLS);
- Department of Defense Sites (DOD);
- formerly used defense sites (FUDS);
- US Brownfield;
- Superfund Consent Decrees (CONSENT);
- Records of Decision (ROD);
- Uranium Mill Tailings Sites (UMTRA);
- Open Dump Inventory (ODI);
- Toxic Chemical Release Inventory System (TRIS);
- Toxic Substances Control Act (TSCA);
- FIFRA/TSCA Tracking System (FTTS);
- Section 7 Tracking Systems (SSTS);
- Land Use Control Information System (LUCIS);
- Incident and Accident Data (DOT OPS);
- Integrated Compliance information System (ICIS);
- FIFRA/TSCA Tracking System Administrative Case Listing (HIST FTTS);
- Drug Lab Site Locations (CDL);
- Radiation Information Database (RADINFO);
- CERCLA Lien Information (LIENS 2);
- PCB Activity Database System (PADS);
- Material Licensing Tracking System (MLTS);
- Mines Master Index File (MINES);
- Facility Index System/Facility Identification Initiative Program Summary Report (FINDS);
- RCRA Administrative Action Tracking System (RAATS);
- Indian Reservations (INDIAN RESERV);
- Indian LUST (INDIAN LUST);
- Indian UST (INDIAN UST);
- Manufactured gas plants;

- State hazardous waste sites (SHWS);
- Municipal Solid Waste Landfills/Transfer Stations (State Landfill);
- Leaking Underground Storage Tank (LUST) list;
- registered underground storage tank (UST);
- Spills listing (SPILLS);
- Sites with Institutional Controls (INST CONTROLS);
- Voluntary Remediation Sites (VCP);
- List of Drycleaner Locations (DRYCLEANERS);
- Wastewater Discharge Permits Listing (NPDES); and,
- Permitted Facility and Emissions Listing (AIRS).

## **SECTION EIGHT: LIST OF PREPARERS**

Below is a list of preparers, contributors, agencies, and/or individuals consulted in the preparation of the SEA. Any information that was utilized from the original EA (FEMA 2019) is still attributed to the original preparers, contributors, agencies, and/or individuals listed in Section Eight of the original EA (FEMA 2019).

- Cristina Clark-Cuadrado, Environmental Protection Specialist, FEMA Region III
- Courtney Doyle, Senior Environmental and Historic Preservation Specialist, FEMA Region III
- Erin Hagan, Environmental Protection Specialist, FEMA Region III
- Leigh Hagan, Environmental Protection Specialist, FEMA Region III
- Tessa Nolan, Regional Environmental Officer, FEMA Region III
- Lauren Szeber, Environmental and Historic Preservation Disaster Transitions/Closeout Section Supervisor, FEMA Region III
- Kelly Wiles, Environmental and Historic Preservation Disaster Recovery Branch Chief, FEMA Region III

### **List of Contributors/Agencies & Individuals Consulted**

- Amanda Murnane, Biologist, USFWS West Virginia Field Office
- Liz Stout, Biologist, USFWS West Virginia Field Office
- Susan Pierce, Deputy State Historic Preservation Officer, WV SHPO
- Mitchell Schaefer, Structural Historian/Section 106 Reviewer, WV SHPO
- Lora A. Lamarre-DeMott, Senior Archaeologist, WV SHPO

## **APPENDICES**

- Appendix A Maps and Figures
- Appendix B Technical Reports
- Appendix C Agency Correspondence
- Appendix D Public Notice
- Appendix E Public Comments

Appendices available upon request to FEMA Region 3 EHP  
(FEMA-R3-EHPPublicComment@fema.dhs.gov)