Roy Cooper, Governor Eddie M. Buffaloe, Jr., Secretary Laura H. Hogshead, Director

## EARLY NOTICE AND PUBLIC REVIEW OF A PROPOSED ACTIVITY IN A 100-YEAR FLOODPLAIN AND WETLAND

## TOWN OF ST. PAULS FLOOD IMPROVEMENTS SOUTH JOHNSON, EAST CLARK, SOUTH ELIZABETH AND EAST ROSS STREETS, ST. PAULS, ROBESON COUNTY, NC 28384

**JUNE 10, 2023** 

To: All interested Agencies, Groups and Individuals

This is to give notice that the North Carolina Office of Recovery and Resiliency (NCORR) has received an application from the Town of St. Pauls to use U.S. Department of Housing and Urban Development (HUD) Community Development Block Grant – Mitigation (CDBG-MIT) funding under 24 CFR 58 from the Infrastructure Recovery Program to implement the Town of St. Pauls Flood Improvements Project ("Proposed Activity") located at South Johnson Street, East Clark Street, South Elizabeth Street; and Calvary Cornerstone Holiness Church; 400 East Ross Street; 401 East Clark Street; and Town of St. Pauls' Waste Water Treatment Plant (WWTP) parcel in St. Pauls, Robeson County, NC 28384. NCORR is conducting an evaluation as required by Executive Orders 11988 and 11990 in accordance with HUD regulations (24 CFR Part 55) including identifying and evaluating practicable alternatives to locating the Proposed Activity in floodplain and wetlands and the Proposed Activity's potential impacts on these special areas. There are three primary purposes for this notice. First, people who may be affected by activities in floodplain and wetlands, and those who have an interest in the protection of the natural environment, should be given an opportunity to express their concerns and provide information about these areas. Commenters are encouraged to offer alternative locations outside of the floodplain and wetlands, alternative methods to serve the same project purpose, and methods to minimize and mitigate impacts. Second, adequate public notice is an important public education tool. The dissemination of information and request for public comment about floodplain and wetlands facilitates and enhances governmental efforts to reduce the risks and impacts associated with the occupancy and modification of these special areas. Third, as a matter of fairness, when the government determines it will participate in actions taking place in floodplain and wetlands, it must inform those who may be put at greater or continued risk.

The State of North Carolina was adversely impacted by the landfall of Hurricanes Matthew (October 8, 2016) and Florence (September 14, 2018). The Proposed Activity is needed to address frequent flooding in an area located between Johnson Street and Elizabeth Street, and north of Clark Street, which is a natural bowl with overland outlets for stormwater. During the Hurricane Matthew storm event, the Town

Mailing Address: Post Office Box 110465 Durham, NC 27709



of Saint Pauls experienced widespread flood damage, especially in areas surrounding South Johnson and East Clark Streets, causing residents in these areas to be stranded and in need of assistance by emergency responders. The Town proposes a system of stormwater improvements that will carry future stormwater events south of these residential areas and connect with the Town's stormwater processing infrastructure. The Proposed Activity entails upgrades to stormwater conveyance infrastructure that includes the installation of catch basins and varying sizes of reinforced concrete piping (RCP), buried underground in previously-disturbed areas, and placed at a depth and slope that will facilitate conveyance of stormwater from the project area served by South Johnson Street, East Clark Street, East Ross Street, and South Elizabeth Street.

The Proposed Activity will result in temporary impacts to 0.04 acres and permanent impacts to 0.009 acres of 100-year floodplain (Zone AE). The Proposed Activity will result in temporary impacts to 0.0563 acres and permanent impacts to 0.072 acres of National Wetland Inventory (NWI) mapped and USACE verified delineated wetlands. These impacts to 100-year floodplain and wetlands include the installation of two 24-inch RCPs in the location of the existing single 24-inch RCP they are replacing to allow for additional flow during storm events under the gravel access road to the St. Pauls' WWTP. The culvert outlets will be armored with 18-inch Class B riprap apron to slow flow velocity and prevent erosion. The proposed permanent wetland impacts total approximately 0.0027 acres resulting from the riprap apron. The contractor shall provide adequate pump around or diversion to keep the work area dry. Additional impacts to wetlands will result from installation of two 36-inch RCPs approximately 244 linear feet in length to be installed within the 20-foot easement leading from East Ross Street into the wetland area. The culvert outlets will be armored with 18-inch Class B riprap apron. The proposed permanent impacts total approximately 0.0686 acres resulting from the rip rap apron and fill within the 20-foot easement. All temporary wetland impacts will result from construction access. Timber mats will be used if conditions within wetlands are saturated to prevent rutting. Silt fence will be installed during construction to prevent runoff from impacting adjacent wetlands onsite. All temporary wetland impacts will be stabilized and allowed to return to natural conditions post-construction. In order to ensure that stormwater is adequately drained from the surrounding area, which is prone to flooding, the two proposed 36-inch RCPs must extend into the wetland. Alternatives were explored to avoid floodplain and wetland impacts, but adequate fall was not achievable without the proposed impacts. The Class B riprap apron was designed to prevent washout at the culvert outlet. The Proposed Activity was designed to allow stormwater discharge to dissipate via sheet flow through the forested wetland before entering Big Marsh Swamp a 177.62-acre Freshwater Forested/ Shrub Wetland (PFO1C).

Natural floodplains and wetlands provide flood risk reduction benefits by slowing runoff and storing flood water. In addition, floodplains and wetlands are beneficial by providing diverse wildlife habitat, flood and erosion control, surface water quality maintenance, groundwater recharge, and educational, scientific, cultural, and recreational opportunities. Wetlands have unique natural characteristics that play an integral role in the ecology of the watershed. Floodwater storage and conveyance, groundwater discharge or recharge, erosion control, and water quality maintenance will be positively affected because the Proposed Activity will allow for stormwater flow to be directly discharged into Big Marsh Swamp rather than flooding the surrounding residential area causing erosion and accumulating debris and pollutants to enter the wetland. Big Marsh Swamp is heavily vegetated and relatively flat which will prevent upstream erosion and provide an avenue for dissipation and wetland hydrology recharge. Construction will result in approximately 0.07 acres of wooded habitat loss. No additional indirect floodplain/wetland impacts or negative impacts to floodplain/wetland values are anticipated. The Proposed Activity will benefit surrounding residential areas by alleviating flooding and preventing private property damage. As conceived and designed, through a system of underground culverts, this Proposed Activity aims to convey stormwater from a relatively flat geographical area downstream to a point south of East Ross Street, for discharge into Big Marsh Swamp. The Proposed Activity is not anticipated to exceed 1.5 acres of disturbance. The Proposed Activity will be completed in accordance with all applicable federal, State, and

local laws, regulations, and permit requirements and conditions including the U.S. Army Corps of Engineers (USACE) Clean Water Act (CWA) Section 404 Nationwide Permit (NWP) 18 Minor Discharges, NC Division of Water Resources CWA Section 401 Water Quality Certification, and Floodplain Development Permit.

Floodplain maps based on the FEMA Flood Insurance Rate Maps (FIRM), the USACE NWP 18 Permit Verification and Jurisdictional Determination, NWI wetlands maps, and supporting documentation are available for review at https://www.rebuild.nc.gov/about/plans-policies-reports/environmental-reviews. A full description of the Proposed Activity may also be viewed in person, by appointment only, at: NCORR, 200 Park Offices Drive, Durham, NC 27709. Call (984) 833-5350 to make an appointment.

Written comments must be received by NCORR at the following address on or before June 26, 2023: Laura Hogshead, Director, NCORR, ATTN: St. Pauls Flood Improvements, P.O. Box 110465, Durham, NC 27709. Comments may also be submitted by email to <a href="mailto:publiccomments@rebuild.nc.gov">publiccomments@rebuild.nc.gov</a> with "ATTN: St. Pauls Flood Improvements Comments" in the subject line.