

TI-923

Prepared: June 21, 2001

Short Description:

Recommendation on How to Proceed with Site in Floodplain.

Inquiry:

The PBS Environmental Hotline caller requested clarification on the FEMA guidelines, specifically the '8-Step Process.' The caller presented the following situation and questions:

The site in question, DRI (Desert Research Institute) is located in a floodplain. There have been designs made by the developer where mitigation measures were outlined. It appears that they have met the requirements and satisfied individuals in positions of authority on the local/county level. Does FEMA take precedence over these individuals? Who reviews and establishes if these mitigation measures are sufficient? There is a need to advise the realty specialist of the best way to proceed. Should they follow the FEMA guidelines and the 8-step process for siting a project in a floodplain, or should they apply for a LOMR (Letter of Map Revision)? What is usually expected with respect to the 8-step process, and how comprehensive a document is it? Is a subcontractor needed to complete this work?

Response:

The PBS Environmental Hotline suggests that to properly apply the 8-Step Process and determine what is involved in this process, one should refer to several documents and guides that outline the procedures involved. These are discussed below, however, it is important that these procedures and steps be addressed thoroughly and followed in the proper order, so as to prevent the need to work backwards down the line.

The NEPA Desk Guide outlines specific procedures for conducting environmental studies. If you do not possess a copy, it can be found on our web site <http://www.gsa.gov/Portal/home.jsp>, then follow the links to 'Support for Communities and the Environment,' 'Environmental Programs,' 'National Environmental Policy Act (NEPA),' and finally 'NEPA Desk Guide' located in the upper left of this page.

The process begins in Chapters 2 and 3, where the responsibilities of GSA are outlined along with the different levels of NEPA analysis that may be required. Depending on the scale, impacts, and controversy surrounding the project, different studies may be required by GSA. These decisions regarding the necessary studies and the extent of studies required are important initial steps in determining the proper course of action. A section more specific to this request is located in Chapter 9 – Special Studies, wherein section 9.6 addresses issues in dealing with Floodplain Studies. They give guidance through the legal and data requirements, and give a brief outline of the FEMA Guidelines and the 8-Step Process. The Water Resources Council document referenced in the Desk Guide contains significantly more detail with respect to this process, and can be obtained from the Federal Register, Vol. 43, No. 29 – Friday, February 10th, 1978.

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