



U.S. Department of Homeland Security
500 C Street, SW
Washington, DC 20472



FEMA

MAY 8 2006

Gustavo Schmidt, P.E.
District Planning and Environmental Engineer
Florida Department of Transportation
Planning and Environmental Management – District 4

**SUBJECT: South Florida East Coast Corridor Transit Analysis (SFECCTA)
Advanced Notification**

Dear Mr. Schmidt,

Thank you for providing FEMA the invitation to the scoping sessions and public meetings that took place on April 17, 19, and 24 of 2006 and for the opportunity to comment on your proposed project. I would like to submit the following comments on behalf of FEMA as they relate to two functions located within the agency's Mitigation Division: NEPA compliance and Floodplain Management.

As you have identified in section 5.c. of the Advance Notification significant portions of the proposed action will take place within the 100-year floodplain. In addition, portions of the action that are outside the floodplain may affect the floodplain. Due to the Federal involvement in the funding and permitting of this activity a review of the Federal action is required under Executive Order (E.O.) 11988 Floodplain Management.

This E.O. 11988, requires Federal agencies to:

- (1) avoid, to the extent possible, the long and short term adverse impacts associated with the occupancy and modification of floodplains, and
- (2) avoid the direct or indirect support of floodplain development whenever there is a practicable alternative.

It establishes avoidance of actions within or affecting the 100-year floodplain, as the preferred method for meeting these requirements. Where there are no practicable alternatives for locating a Federal action in the floodplain, for undertaking a Federal action that is located outside the floodplain but affects the floodplain, or for undertaking a Federal action that would directly or indirectly support development in the floodplain, Federal agencies must minimize potential harm to people and property, and to natural and beneficial floodplain values.

We encourage Federal agencies to implement the requirements of E.O. 11988 early in the planning and design process. The U.S. Department of Transportation has implementing procedures for carrying out the requirements of E.O. 11988. As a consultation agency for E.O. 11988, FEMA is available to provide guidance to Federal agencies on implementing the requirements of the Executive Order.

We encourage the Florida Department of Transportation's District 4 to incorporate the objectives of E.O. 11988 in the planning and design of the South Florida East Coast Corridor Transit Analysis. In doing so, you will be providing invaluable information and assisting your Federal partners in meeting their responsibilities under E.O. 11988.

From the events of the last two hurricane seasons I am sure you recognize the importance of implementing sound floodplain management in order to protect the life and property of Florida's citizens.

For more information and assistance please contact Charles Beck, Environmental Specialist at Region 4 at (770) 220-5334 or charles.beck@dhs.gov.

Thank you again.

Sincerely,



David I. Maurstad
Director
Mitigation Division