

**Draft Environmental Assessment
Emergency Temporary Housing
Hurricane Rita
FEMA-1607-DR-LA**

A. Project: The Matte Property Temporary School Site

B. Introduction

The Department of Homeland Security's Federal Emergency Management Agency (FEMA) is mandated by the U.S. Congress to administer Federal disaster assistance pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), PL 93-288, as amended. The Stafford Act authorizes FEMA's Public Assistance Program to provide emergency temporary administrative, educational, medical, or other support facilities for areas impacted by disasters while repairs and reconstruction of storm damaged facilities are being undertaken.

Hurricane Katrina, a Category 4 hurricane with a storm surge above normal high-tide levels, moved across the Louisiana, Mississippi, and Alabama gulf coasts on August 29, 2005. Maximum sustained winds at landfall were estimated at 140 miles per hour. On September 24, 2005 Hurricane Rita made landfall just east of Sabine Pass, Texas, near the Louisiana border. The storm was a Category 3 hurricane with sustained winds in excess of 120 mph and storm surge 15 to 20 feet above normal high tide. President Bush declared a major disaster for Louisiana due to damages from Hurricane Katrina, and signed a disaster declaration (FEMA-1603-DR-LA) on August 29, 2005, authorizing FEMA to provide federal assistance in designated areas of Louisiana. A second Presidential disaster declaration in response to damages from Hurricane Rita (FEMA-1607-DR-LA) was declared on September 24, 2005.

The storms caused significant impacts to the school system of Vermilion Parish including damage to buildings and displacement of students. The Vermilion Parish School Board has proposed the Matte Property as a suitable location for a temporary school campus for the town of Erath. This Draft Environmental Assessment (DEA) documents the results of a study of the Matte Property and potential environmental impacts of the proposed project. This DEA has been prepared in compliance with the National Environmental Policy Act of 1969 (NEPA); the President's Council on Environmental Quality regulations implementing NEPA (40 CFR 1500-1508); and FEMA's regulations implementing NEPA (44 CFR 10.9). FEMA will use the findings in this EA to determine whether to prepare an Environmental Impact Statement (EIS) or a Finding of No Significant Impact (FONSI).

C. Purpose and Need

The Vermilion Parish School Board has requested funding from FEMA's Public Assistance program to construct a temporary educational campus within the town of Erath. The Vermilion Parish school system acquired 227 additional students as a result of hurricane Katrina. Seven schools were subsequently impacted by Hurricane Rita's storm surge resulting in displacement of 3,000 students throughout the parish. These students are currently enrolled in schools not affected by the storm surge. Schools in Erath were especially hard hit. Buildings that suffered flooding and subsequent mold damage were demolished. The students of damaged schools initiated platooning, or partnering systems, with other schools in the Parish that were not damaged. Platooning consists of one set of students attending a facility on Monday, Wednesday, and Friday, while the students from the opposite school attend classes on Tuesday, Thursday, and Saturday. Currently students from Dozier Elementary School are platooning with Maurice Elementary School, students from Erath Middle School are platooning with J. H. Williams Middle School, and Erath High School students are platooning at Abbeville High School. As a result of the platooning process, the schools are failing to meet the minimum amount of instructional hours required by the state board of Elementary and Secondary Education. At the current rate, the school district will be short 44 days of instructional time by June 1, 2006. In addition, many students are bused an average distance of 20 miles, which averages an hour or longer from the first pick-up time. Dozier Elementary School has an enrollment of 828 students, Erath Middle School an enrollment of 621, and Erath

High School an enrollment of 535. The Vermilion Parish School Board has requested funding from FEMA's Public Assistance program to construct a temporary educational campus within the town of Erath that will enable the district to expeditiously return all schools to regular instructional days as soon as possible. The proposed facility would be comprised of 28 prefabricated structures installed on the Matte property, on the northwest side of the town of Erath. Each of the three schools would spend a year attending classes at the temporary campus while their school buildings are being repaired.

D. Project Alternatives

NEPA requires the investigation and evaluation of reasonable project alternatives as part of the project environmental review process. Two alternatives are addressed in this DEA: the No Action Alternative, where FEMA would not provide funding, and the Proposed Action, where FEMA would provide funding for construction of a temporary educational facility on the Matte property in the City of Erath in Vermilion Parish, Louisiana.

Alternative 1- No Action Alternative

Under the No Action alternative, FEMA would not fund the proposed project. Students of Dozier Elementary, Erath Middle School, and Erath High School would continue to share educational facilities of other schools until their school can be repaired. This would result in further disruption of the Vermilion Parish school system, and further personal hardships for students and school staff in Erath.

Alternative 2 – Installation of Pre-Fabricated Dwellings on Undeveloped Land (Proposed Action)

The Proposed Action would provide an adequate educational facility in the town of Erath for students and staff whose school buildings were impacted by Hurricane Rita. The project would involve the construction of a school campus composed of 28 prefabricated mobile structures (hereafter "the School"). At this time the proposed site will consist of 24 classroom structures, 3 bathrooms, and 1 new dining hall building. The Army Corps of Engineers will construct the facility as a mission assignment. Occupancy of the School facility is expected to last three years, with each of the impacted schools, Dozier Elementary, Erath Middle, and Erath High, spending one school year attending classes in the temporary facility while the original buildings on their respective campuses are repaired.

The proposed site for the School is known as the Matte Property and has no formal address. The coordinates of the property are N29.9659611, W-92.04746389. It is located on the east side of North Road, north of the LA 14 bypass, in Erath, Vermilion Parish (Figures 1 and 2). The site location makes up the western portion of a 40-acre field owned by the Vermilion Parish School Board that was formerly cultivated in rice. The site is located about 100 meters north of the highway 14 bypass, or about 1.25 miles northwest from the center of Erath. The site is bordered on the north by a rural farmhouse with outbuildings and a recently constructed softball field. The site is bordered on the south and east by fallow fields, and on the west by North Road. The terrain is flat and covered entirely with mowed grass/hay. The temporary classroom structures would be installed just east of North Road, and a recreation area would extend eastward from the classroom buildings (Figure 3).

The site will be graded, and the topsoil cleared from the site will be stockpiled on 1 acre of adjoining land to be replaced when the temporary facilities are removed. The culverts on the north side will be reinforced with 12 inch drain pipes. The site will receive a new driveway off of North Road for bus and car access. The drive will have a turn-around at the east end for buses, as well as two parking areas totaling 96 spaces. Driveway and parking areas will be graded and covered with three inches of crushed limestone. The primary electrical service will run underground to multiple transformers, with overhead secondary connections to applicable buildings. Water and sewer will run underground to supply the school buildings. Water will be connected by an eight inch line to provide a velocity of at least 1100 gallons per minute for adequate fire protection. Sewage will be run to the buildings through an underground eight inch line, and a lift station will be installed to facilitate proper flow. Because the proposed site is located in the 100 year floodplain, the buildings will be elevated to the appropriate

height above base flood elevation and a flood evacuation plan will be implemented. A safety fence will be installed and maintained around the perimeter of the school.

When the need for temporary facilities has ended, FEMA expects that the buildings would be hauled from the site to suitable locations elsewhere (to be determined on a case-by-case basis). The project area would then be seeded and restored to its previous conditions or used by the landowner in a manner consistent with local zoning classifications.

E. Site Selection Process

NEPA requires investigation and evaluation of reasonable project alternatives as part of the project environmental review process. In order to expedite the site selection process, FEMA's contractors review available aerial photos and maps, conduct site reconnaissance field surveys, and contact state and local officials to identify potential sites. Factors considered in choosing a site include: site topography, property owner willingness, past land use, if it was already planned for development, access to existing utilities, and engineering feasibility.

F. Affected Environment and Environmental Consequences

In order to meet the proposed purpose and need of timely delivery of emergency temporary housing, FEMA conducted an expedited environmental review process to identify environmental issues that need addressing.

Alternative 1- No Action Alternative

The No Action alternative will not impact the existing environment. The No Action alternative would entail no construction or preparation of a site for temporary emergency educational facilities nor would it allow the federal government to adequately address the urgency for providing educational facilities to Vermilion Parish. Consequently, students of Dozier Elementary, Erath Middle, and Erath High Schools would have to continue alternating attendance at other, more distant, schools. The No Action alternative would forego disaster assistance and would not be acceptable to the local community or local interests. Flood victims would continue to suffer stresses related to disaster displacement, and the students of six schools in Vermilion Parish will receive insufficient classroom instruction time.

Alternative 2 – Build Temporary Housing (Proposed Alternative)

The environmental review process for the Proposed Action included a field reconnaissance site visit, as well as background research and expedited agency consultation. The field reconnaissance visit was conducted on November 26, 2005. Background research consisted of a review of wetlands maps, census statistics, FEMA floodplain maps, hazardous materials databases, archaeological and historic structures databases, threatened and endangered species information, soil surveys, and other available information. Expedited agency consultation through verbal and written communications with the Louisiana State Historic Preservation Office (SHPO) resulted in a "No Effect" determination.

Table 1 (below) summarizes the results of the environmental review process, including the appropriate investigation, coordination and consultation with regulatory agencies is described. Potential environmental impacts that were found to be negligible are not evaluated further. Resource areas that have the potential for impacts of minor, moderate, or major intensity are further reviewed in Section G. When applicable, mitigation measures that would reduce any potential adverse effects are required as conditions for the project to proceed. Definitions of the impact intensity are described below:

Negligible: The resource area would not be affected, or changes would be either non-detectable or if detected, would have effects that would be slight and local. Impacts would be well below regulatory standards, as applicable.

Minor: Changes to the resource would be measurable, although the changes would be small and localized. Impacts would be within or below regulatory standards, as applicable. Mitigation measures would reduce any potential adverse effects.

Moderate: Changes to the resource would be measurable and have both localized and regional scale impacts. Impacts would be within or below regulatory standards, but historical conditions are being altered on a short-term basis. Mitigation measures would be necessary and the measures would reduce any potential adverse effects.

Major: Changes would be readily measurable and would have substantial consequences on a local and regional level. Impacts would exceed regulatory standards. Mitigation measures to offset the adverse effects would be required to reduce impacts, though long-term changes to the resource would be expected.

Table 1. Affected Environment and Environmental Consequences Matrix

Resource Area	Impact Intensity				Impact Summary	Agency Coordination / Permits	Mitigation
	Negligible	Minor	Moderate	Major			
Geology and Soils		X			The Farmland Protection Policy Act requires Form AD-1006 be completed by local Natural Resources Conservation office to rate the impact of lands removed from agricultural use. See Section G.	Form AD-1006 received from Vermilion NRCS office January 31, 2006.	
Hydrology and Floodplains (Executive Order 11988)		X			Project area is located in Zone A13, which is within a 100-year floodplain per the FEMA Flood Insurance Rate Map 220221 0300 D. No impacts anticipated. Completion of this EA is consistent with FEMA's 8 Step-Planning Process. Project must accordingly comply with the minimum requirements of the National Flood Insurance Program as outlined in 44 CFR Part 60.	FEMA NFIP Elevation Certificate signed 1/17/06.	
Wetlands (Executive Order 11990)	X				No wetlands were observed at the project site during the site reconnaissance. No wetlands were shown on the USFWS National Wetland Inventory (NWI) maps. No impacts anticipated.		
Coastal Zone Management	X				Project site is not located within the boundaries of the Coastal Zone. No impacts to the Louisiana Coastal Zone anticipated.		
Water Quality	X				Potential for localized increase in sedimentation during construction.	Stormwater construction permits to be obtained by construction contractor.	Implement construction Best Management Practices, i.e., install silt fences, straw bales, etc. to reduce sedimentation. If fill is stored on site, the contractor would be required to cover it appropriately.
Air Quality	X				Negligible impact would be anticipated from vehicle exhaust emissions and increased dust during construction. Federal and state air quality attainment levels would not be exceeded.	EPA Region 6 designation.	Area soils would be covered and/or wetted during construction to minimize dust.

Resource Area	Impact Intensity				Impact Summary	Agency Coordination / Permits	Mitigation
	Negligible	Minor	Moderate	Major			
Vegetation and Wildlife	X				The project site is a fallow field. Informal consultation with state and federal resource agencies regarding restoration of the site following the need for temporary classrooms will ensure that the project does not adversely impact regional species diversity. Impacts to natural resources are expected to be negligible.		Once the temporary housing need has ended, the site would be seeded and restored to previous conditions to the extent practical and/or used by the landowner in a manner consistent with local zoning. This may include a requirement to use native species to re-vegetate the site
Threatened and Endangered Species (Endangered Species Act, Section 7)	X				Nine species are listed as Endangered or Threatened in Vermilion Parish. However, no species or appropriate habitats are located within the project area. No impacts anticipated.	USFWS guidance letter dated September 27, 2005.	
Cultural Resources (National Historic Preservation Act, Section 106)	X				FEMA has determined that the project will have no effect on historic properties.	SHPO concurrence December 9, 2005.	
Socioeconomics	X				The action is expected to have beneficial impacts to the community by providing adequate educational opportunities within reasonable proximity to the need.		
Environmental Justice (Executive Order 12898)	X				The proposed action will provide assistance to all students of the effected schools. The percent populations of zip code 70533 are 92.3% Caucasian, 5.0% African American, and 1.1% Hispanic. The median household income for the area is \$31,310, and 12.2% of families are below the poverty level. The proposed action is not expected to pose disproportionately high and adverse public health or environmental effects on minority and low-income populations.		

Resource Area	Impact Intensity				Impact Summary	Agency Coordination / Permits	Mitigation
	Negligible	Minor	Moderate	Major			
Noise	X				During the construction period residents immediately adjacent to the project site would experience an increase in noise levels. Due to the urgency of the situation, construction would likely occur on a 24-hour schedule until the School is completed. Construction noise impacts would be short-term and limited to the duration of construction activities. The vehicles from School use would also increase the level of vehicular noise in the area.		If necessary, the following noise reduction measures should be considered: (1) restricting the 24-hour schedule to the first two weeks of construction; (2) using a 7 a.m. to 7 p.m. construction schedule; (3) completing construction closest to adjoining residents first; and (4) completing noisier activities during the day if a 24-hour schedule is used.
Safety and Security	X				Site plans include installation of a perimeter fence around school. No safety concerns anticipated.		The contractor would post appropriate signage and fencing to minimize potential adverse public safety concerns, including placing fencing around the site perimeter. Appropriate signage and barriers should be in place prior to construction activities in order to alert pedestrians and motorists of project activities and traffic pattern changes.
Hazardous Materials and Toxic Wastes	X				A search of hazardous materials databases found no records for the site or in the near vicinity. No impacts anticipated.	FirstSearch report and LDEQ record search dated December 10, 2005	
Traffic and Transportation	X				Traffic volumes on the local road network in the project area would increase during construction and occupancy of the School. The existing infrastructure would be able to accommodate these increases without impacting local traffic.		

G. Additional Impact Analysis

Soils and Farmland Protection Policy Act

Construction of the proposed campus constitutes a change in land use. The proposed site is undeveloped, and is presumably fallow agricultural land. Construction of the school involves placement of underground utilities. The impact of the project is not easily reversible. In accordance with the Farmland Protection Policy Act (FPPA) consultation was initiated January 20, 2006 with the Abbeville district office of the Natural Resources Conservation Service (NRCS). Soils on the proposed school site are shown to be Frozard silt loam in the Vermilion Parish soil survey. Frozard soils are not considered prime according to the NRCS List of Prime and Other Important Farmlands for Vermilion Parish. The Farmland Conversion Impact Rating (Form AD-1006) was completed January 31, 2006. The site received a rating of 160, which is the minimum score for consideration under the FPPA and indicates the project will have minimal impacts to farmlands in Vermilion Parish.

Floodplain

The Matte property is located in flood zone A13 according to FEMA Flood Insurance Rate Map 220221-0300-D, effective May 15, 1985. FEMA's 8-step process for avoiding development in the floodplain was completed on January 27, 2006. The 8-step process requires consideration of alternative sites outside the floodplain. Alternative site locations, such as the space behind the Erath High School or the paved areas of Dozier Elementary, were not large enough for all the necessary buildings. The Abbeville airport was considered, but rejected due to noise considerations. Other areas outside the floodplain were either too distant from the students, or were not available for lease. The 8-step process concluded that the Matte Property was the only practicable alternative for temporary classroom facilities. Classroom buildings will be elevated to the base flood elevation and a flood evacuation plan developed. A National Flood Insurance Program (NFIP) Elevation Certificate was issued for the school project January 17, 2006. Based on this, the Army Corps of Engineers was issued a building permit by the Town of Erath on January 24, 2006 (permit number 551).

H. Cumulative Impacts

Cumulative impacts are defined as environmental effects that are greater in magnitude, extent, or duration than the direct and indirect effects of the proposed FEMA-associated action when combined with the effects of other current and future actions, regardless of the proponent. Cumulative impacts will be considered when determining the compatibility of this EA for specific actions.

I. Public Involvement:

Due to the emergency nature of this action, the public comment period will be brief – February 3 to February 5, 2006. Written comments on the draft EA can be faxed to FEMA's Joint Field Office in Baton Rouge at (225) 346-5848; or sent via email to ecomments@dhs.gov. when responding by email, enter code **VE-04** in the subject field. Verbal comments will be accepted at (225) 376-5270 and TTY for hearing or speech-impaired at 800-462-7585; between 8:00 A.M. and 5:00 P.M. The Environmental Assessment can be viewed and downloaded from FEMA's website at <http://www.fema.gov/ehp/docs.shtm>. The draft EA is also available for public review at the FEMA Disaster Recovery Center (DRC) located at 407 Charity Street, Abbeville, LA., and the Vermillion Parish Library located at 405 East St. Victor, Abbeville, LA. The DRC hours are 9:00 AM to 5:00 PM, Monday through Saturday. If no substantive comments are received, the Draft EA will become final and this initial Public Notice will also serve as the final Public Notice.

If no substantive comments are received, the Draft EA and FONSI will become final and the initial Public Notice will also serve as the final Public Notice. Substantive comments will be addressed as appropriate in the Final documents.

J. Conclusion

To provide temporary emergency disaster relief for people impacted by Hurricanes Katrina and Rita in southern Louisiana, FEMA is proposing to construct a temporary emergency educational facility for the city of Erath. The numbers of displaced students emphasizes the critical need for this facility. The purpose for this DEA is to minimize the potential for adverse environmental impacts from the Proposed Action. This DEA is based on site evaluations conducted between November 26, 2005 and January 31, 2006. Table 1 (above) addresses the requirements of the National Environmental Policy Act, Endangered Species Act, Executive Orders 11988 (Floodplain Management), 11990 (Protection of Wetlands), and 12898 (Environmental Justice), and various hazardous and toxic waste regulations. This DEA provides a mechanism to ensure compliance with applicable local, state and federal environmental laws and regulations, and to support the timely and effective provision of temporary emergency facilities. Findings of this DEA indicate that impacts to the environment from the Proposed Action would be negligible, and an Environmental Impact Statement is not required for this action.

K. References

Breaux, Pam. State Historic Preservation Officer. Concurrence letter of “no historic properties effected.” December 9, 2005.

Environmental FirstSearch Report, Job Number 15702452, prepared December 10, 2005.

Federal Emergency Management Agency, Flood Insurance Rate Map (FIRM), Community Panel 220221-0300-D, revised May 15, 1985.

Federal Emergency Management Agency, National Flood Insurance Program Elevation Certificate, Certified by Wil J. Guidry, January 17, 2006.

Sellers Group, A Temporary Campus for Dozier Elementary School, Erath Louisiana, January 16, 2006.

U.S. Bureau of the Census. 2000. American Factfinder. <http://www.census.gov>. Website accessed November 26, 2005.

U.S. Department of Agriculture, Natural Resources Conservation Service, Soil Data Mart website accessed January 30, 2006, available at: <http://soildatamart.nrcs.usda.gov/>

U.S. Department of Agriculture, Natural Resources Conservation Service, Farmland Conversion Impact Rating for Corridor Type Projects, completed January 31, 2006.

U.S. Department of Agriculture, Natural Resources Conservation Service, Soil Survey of Vermilion Parish, Louisiana, issued May 1996.

U.S. Department of the Interior, Fish and Wildlife Service, Letter to Don Fairley, FEMA Regional Environmental Officer, September 27, 2005.

U.S. Department of the Interior, Fish and Wildlife Service. Wetlands Online Mapper, <http://wetlandfws.er.usgs.gov/wtlnds/launch.html>. Website accessed January 17, 2006.

Town of Erath Department of Permits and Inspections Application for Building Permit Number 551, January 24, 2006, issued to the Vermilion Parish School Board (Owner), Army Corp of Engineers (Contractor).

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J. Appendices

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