



Draft Environmental Assessment

University of Iowa Hancher Auditorium

Iowa City, Iowa

FEMA DR-1763-IA

November 11, 2011

Federal Emergency Management Agency

Department of Homeland Security

9221 Ward Parkway, Suite 300

Kansas City, MO 64114-33



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ABBREVIATIONS AND ACRONYMS

| | |
|--------|--|
| AADT | Average Annual Daily Traffic |
| BMP | Best Management Practices |
| CFR | Code of Federal Regulations |
| CERCLA | Comprehensive Environmental Response, Compensation and Liability Act |
| CEQ | Council on Environmental Quality |
| ESA | Endangered Species Act |
| EA | Environmental Assessment |
| EO | Executive Order |
| FPPA | Farmland Protection Policy Act |
| FONSI | Finding of No Significant Impact |
| FIRM | Flood Insurance Rate Maps |
| HVC | Hancher/Voxman/Clapp |
| IDNR | Iowa Department of Natural Resources |
| IDOT | Iowa Department of Transportation |
| JCCOG | Johnson County Council of Governments |
| LEED | Leadership in Energy and Environmental Design |
| LOMR | Letter of Map Revision |
| MOA | Memorandum of Agreement |
| MPO | Metropolitan Planning Organization |
| NAAQS | National Ambient Air Quality Standards |
| NEPA | National Environmental Policy Act |
| NRHP | National Historic Preservation Act |
| RCRA | Resource Conservation and Recovery Act |
| SWPPP | Stormwater Pollution Prevention Plan |
| USACE | U.S. Army Corps of Engineers |
| USDA | U.S. Department of Agriculture |
| HUD | U.S. Department of Housing and Urban Development |
| USFWS | U.S. Fish and Wildlife Service |
| UIHL | University of Iowa Hygienic Laboratory |

1. INTRODUCTION

The University of Iowa (UI) is the largest university in Iowa. A member of the Big Ten conference, UI was established by the State of Iowa in 1847 under the jurisdiction of the Iowa State Board of Regents with a threefold mission: teaching, research, and public service. Located in Iowa City, Iowa, the UI has facilities along both sides of the Iowa River in central Johnson County, Iowa.

Beginning on June 9th, 2008, UI facilities located near the Iowa River including the Hancher/Voxman/Clapp (HVC) complex experienced extensive damage from the flooding of the Iowa River and its tributaries which flooded portions of Iowa City and the surrounding area. Hancher Auditorium and the entire HVC complex were utilized for a variety of functions. Hancher Auditorium provided a quality, superior venue for presentation of world-class cultural events, bringing to the State of Iowa opportunities for access to fine cultural affairs that might not otherwise be offered other than in distant urban areas.

On May 27, 2008 President Bush declared a major disaster in the State of Iowa (DR-1763) pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act, as amended, 42 U.S.C Section 5121-5206. The implementing regulations may be found in title 44 of the Code of Federal Regulations (CFR) Part 206. The incident period began on May 25, 2008 and closed August 13, 2008. The current flood damaged location of Hancher Auditorium is between the Iowa River and North Riverside Drive and south of Park Road in north central Iowa City, Iowa. Hancher Auditorium served the students and faculty of the University of Iowa and the general populace of the State of Iowa. Hancher Auditorium is a significant portion of the cultural core of the University of Iowa.

The National Environmental Policy Act (NEPA) requires that Federal agencies evaluate the environmental effects of their proposed and alternative actions before deciding to fund an action. The President's Council on Environmental Quality (CEQ) has developed a series of regulations for implementing the NEPA. These regulations are included in title 40 CFR, Parts 1500-1508. They require the preparation of an Environmental Assessment (EA) that includes an evaluation of alternative means of addressing the problem and a discussion of the potential environmental impacts of a proposed Federal action. An EA provides the evidence and analysis to determine whether the proposed Federal action will have a significant adverse effect on human health and the environment. An EA, as it relates to the FEMA program, must be prepared according to the requirements of the Stafford Act and 44 CFR, Part 10. This section of the Federal code requires that FEMA take environmental considerations into account when authorizing funding or approving actions.

The HVC complex also housed the School of Music Program at UI. During the site selection process, described in more detail in Section 3, the UI decided to split the Music Program housing into two new replacement facilities, a new Hancher Auditorium and a new music facility located in downtown Iowa City. This EA was conducted in accordance with both CEQ and FEMA regulations for NEPA and will address the environmental issues associated with FEMA grant funding as applied towards construction of a replacement HA at the proposed site (Appendix A, Figures 1 and 2). The UI hired Seneca Companies to prepare a draft of this EA which was then submitted to FEMA for final draft and posting for public comment.

Executive Order (EO) 11988 (Floodplain Management) requires that Federal Agencies assume a leadership role in avoiding direct or indirect support of development within the 100-year floodplain whenever there is a practical alternative. At present, the damaged facility is located within the 100-year floodplain and subject to repetitive flooding (see 5.10.2). Rather than repair the facility at its current location, FEMA and UI conducted a thorough review of the practicable alternatives to restoring the function of this facility at a location outside the floodplain and not subject to repetitive flood damage (Appendix A, Figure 4).

2. PURPOSE AND NEED

Pursuant to Section 406 of the Robert t. Stafford Disaster and Emergency Assistance Act of 1988, as amended, the University of Iowa has requested funding through the FEMA Public Assistance Program. FEMA's Public Assistance Program provides supplemental Federal disaster grant assistance for the repair, replacement, or restoration of disaster damaged, publicly owned facilities.

The purpose of this project is to assist the citizens of Iowa in their recovery from the natural disaster by using the FEMA Public Assistance Program to contribute funding towards the construction of a new Hancher Auditorium. The proposed site of the new Hancher Auditorium is located immediately north of the existing, flood damaged structure. The need for the project is to protect the facility and function of Hancher Auditorium from future flooding by relocating outside the 500-year floodplain in response to a devastating flood that struck Iowa City, Johnson County, Iowa, in 2008. Since the June 2008 floods, the functional use of the existing Hancher Auditorium has been terminated and events normally held there have been temporarily relocated to a variety of venues in the Iowa City area. In order to continue to meet the needs of the State with cultural programs and events in a central, accessible, quality setting.

Hancher Auditorium provides essential services to the State of Iowa. These services include not only the offering of fine-art cultural programs and events, but numerous educational programs. Hancher Auditorium serves the community, the region, and the State by connecting artists to audiences and providing educational opportunities for exposure to quality art and culture, accessible to everyone. Hancher Auditorium offers innovative education programs that each year involve more than 20,000 students. While bringing some of the world's best performers to Iowa audiences, Hancher Auditorium increases the University's and Iowa's visibility and attracts students, faculty, and others to the State. In addition, Hancher Auditorium brings the arts to cities and towns across Iowa, helps educate the artists and arts audiences of the future, and provides hands-on training to UI students interested in arts and theatre management careers. If Hancher Auditorium is not relocated and rebuilt, UI's ability to continue offering quality cultural and educational events would be compromised.

3. ALTERNATIVES ANALYSIS

NEPA requires the investigation and evaluation of reasonable project alternatives as part of the project environmental review process. EO 11988 requires the investigation of practical alternatives prior to Federal agencies taking actions that provide direct or indirect support of floodplain development. Two alternatives are addressed in this EA: the No Action Alternative, where no FEMA grant funding is applied towards construction of an auditorium, and the Proposed Action, where FEMA grant funding is applied towards construction of the new HA in Iowa City at a location outside the 500-year floodplain.

The HVC complex was damaged to a level that led the Federal Emergency Management Agency to designate it eligible for replacement which the UI chose to pursue. UI established a Flood Task Force (FTF) to identify the optimum relocation site. In a phased approach, the FTF identified alternative sites for construction of a new HVC complex. Building program requirements were identified including the size of the facility footprint and parking requirements. Site selection assumptions criteria were identified. Of the criteria, those that qualified as critical factors toward site selection were identified and evaluated on their ability to meet the purpose and need of the proposed project. Critical factors included site size, site shape, topography and flood exposure, proximity to related programs, parking availability – event and daily use, service access and pedestrian access. The final selection of the proposed location met the criteria while avoiding what were identified as “critical flaws”, such as lack of proximate or inadequate parking, inadequate size, or flood exposure. As a result of the first phase of the site selection process, the FTF narrowed the initial selection of eight (8) sites down to two (2) sites with a list of advantages and issues for each site.

After the first phase, factors were identified for additional study and site selection assumptions were reevaluated. One of the assumptions was that HVC should be located together as a single complex on a single site. Upon reevaluation, the FTF decided that a split program option should be explored to determine if site location advantages could be achieved. UI selected the split program option based on differentiating factors such as parking construction costs and utility construction costs among others. UI selected the proposed project location for Hancher Auditorium based on these factors and their evaluation of criteria, thereby limiting the available project relocation alternatives considered.

3.1 No Action

Inclusion of a No-action Alternative in the environmental analysis and documentation is required under NEPA. The No Action Alternative is defined as maintaining the status quo with no FEMA funding for an alternative action.

The No Action Alternative is used to evaluate the effects of not providing eligible assistance for the project, thus providing a benchmark against which “action alternatives” may be evaluated. For the purposes of this alternative, it is assumed that the University of Iowa would continue to use temporary locations and not be able to construct a new Hancher Auditorium and provide the facilities to house the necessary services within a new facility. Therefore, no FEMA grant funding would be applied towards construction of a new Hancher Auditorium and the UI would be unable to provide community services

offered at Hancher Auditorium to the citizens of Iowa City and the State of Iowa.

3.2 Proposed Action

This alternative provides FEMA grant funding towards construction of a new Hancher Auditorium at the proposed site immediately north of the existing, damaged facility on land located above the 500-year floodplain. This site was preferred because it best meets the purpose and need by providing the public with easy accessibility and close proximity to existing infrastructure. The University of Iowa has contracted the design work for the proposed alternative to Pelli Clarke Pelli / OPN Architects. M.A. Mortensen has been selected as construction management agent for the proposed project. Photos of the proposed construction site are presented in Appendix B, Figure 1.

The new Hancher Auditorium project would involve constructing a 1950 seat theater facility with associated flexible rehearsal space. The new facility, constructed to meet UI Design Standards and Procedures, will have approximately 165,000 gross square-feet. Excavation and grading will be required in order to remove existing landscape vegetation and remove existing access road pavement. The construction will occur in an area previously developed with residences which were razed at the time of construction of Hancher Auditorium, which opened in 1972. The new Hancher Auditorium is principally a public oriented performance facility along with space necessary to accommodate the needs for performance rehearsals and technical support.

One of the critical factors identified in guiding the site relocation process was flood exposure, i.e., location outside the 500-year floodplain, as recommended by the UI FTF. The proposed site of the new Hancher Auditorium is located immediately north of the existing flood-damaged HVC complex, west of the Iowa River and south of Park Drive, southeast and east of the Levitt Center for University Advancement, on land owned by UI for many years. The site is designated by the National Flood Insurance Program as located outside the 100 and 500-year floodplains and thus is consistent with EO 11988 and the City's Floodplain Ordinance. The site will be of the same use as previously, designated P2 on the Iowa City Zoning Map, and compatible with the surrounding land use.

3.3 Alternatives Considered and Dismissed

A number of alternatives were evaluated during the development of the proposed project. The continued use of temporary locations was not considered a viable alternative. Alternatives analyzed included elevation of the existing structure out of the 100-year floodplain and dry flood proofing the existing structure. As a result of an engineering analysis of feasibility by FEMA, elevation of the existing structure was determined to not be a feasible alternative. Raising the structure to above the 100-year floodplain to comply with the National Flood Insurance Program would require elevating the structure roughly 20 feet in the air. The engineered fill material needed would require placement at a 4 to 1 slope with a massive retaining wall needed to keep the increased footprint from encroaching onto an existing parking lot. The structure would still be subject to flood damage caused by erosion of the engineered fill that could impact its structural integrity. Of the two alternatives, it was determined that dry flood proofing, although more costly, was more feasible. However, when compared with the cost of relocation, dry flood proofing was nearly double. It was therefore recommended that relocation be the preferred alternative.

Other sites considered by the FTF included six (6) locations within or near the downtown portion of Iowa

City. However, these sites had critical flaws that rendered them not fit for the purpose and need of the proposed project. Alternative sites considered were less desirable for the new Hancher Auditorium as demonstrated by the selection process and were dismissed as alternatives. The critical flaws were lack of proximate or inadequate parking, inadequate size, flood exposure and /or inaccessibility to utilities.

4. SUMMARY OF IMPACTS AND MITIGATION

Two alternatives were evaluated in this EA:

- No Action Alternative
- Proposed Action

Table 4-1 summarizes the potential environmental impacts expected with each of the two alternatives. Additional information is located in Section 5.

As shown in table 4-1, the No Action Alternative could result in no environmental impacts on the environment.

As shown in table 4-1, the selection of Proposed Action could result in minor environmental impacts from the temporary increase in noise and traffic and the production of fugitive dust during construction. Long term and cumulative impacts were not identified.

Table 4-1: Summary of Impact and Mitigation

| Environmental Resource | No Action | Proposed Action |
|---------------------------------------|------------------|--|
| Air Quality | No impact | No significant impact. Fugitive dust would result from construction activities, expected to last 30 months. Best management practices would be implemented. |
| Biological Resources | No impact | No impact. Rare species are not present in the project area. |
| Executive Order Wetlands | No impact | No impact. Wetlands are not present in the proposed construction area. |
| Executive Order 11988/Floodplain Mgmt | No impact | No impact. The proposed new site is located outside the 500-year floodplain. The project will have no long-term adverse effects to the floodplain. |
| Threatened and or Endangered Species | No Impact | No impact. Threatened or endangered species are not present in the project area. |
| Cultural Resources | No impact | Adverse effect. The abandonment of the original NRHP eligible structure facilitates demolition; therefore a Memorandum of Agreement has been initiated by FEMA to resolve adverse effects. |
| Geology and Soils | No impact | No significant impact. Construction activities would |

| | | |
|--|-----------|--|
| | | clear some existing vegetation and expose soil in the proposed construction area. |
| Land Use and Planning | No impact | No impact. Land use does not change. The land is currently Zoned P2, Institutional, public. |
| Hazardous Substances | No impact | No known impact. In the event that soil contamination is discovered during construction activities, the IDNR should be contacted. Work within a discovered contaminated area should not resume until IDNR personnel indicates no further assessment is needed. |
| Noise | No impact | No significant impact. Construction activities may increase the noise levels in the immediate area of the construction project. Activities will take place during daylight hours and no sensitive noise receptors are located in the immediate vicinity of the project area. |
| Executive Order 12898, Environmental Justice | No impact | No impact. Implementation of this alternative would have little likelihood of having disproportionate impacts on any low income or minority groups. |
| Transportation | No impact | No significant impact. Flagmen and possibly escort vehicles would be utilized for construction purposes which may temporarily disrupt traffic. |
| Water Quality/Water | No impact | No impact. Contractor to implement requirements of NPDES MS4 and Iowa Permit No.2 water discharge permits. Permits require implementation of best management practices, such as installing silt fences/straw bales to reduce soil erosion and sedimentation. |
| Cumulative Impacts | No impact | No significant impact. The development of the site into the new Hancher Auditorium would not pose a significant cumulative impact or impact the surrounding area. |

5. AFFECTED ENVIRONMENT AND IMPACTS

Chapter 5 describes the existing environmental conditions that may be affected by the proposed FEMA grant funding being applied towards construction of new Hancher Auditorium. The environmental impacts of the No Action Alternative are also analyzed.

This chapter also describes the potential environmental consequences of the Proposed Action alternative by comparing them with the potentially affected environmental components. The proposed activity was also evaluated against existing environmental documentation on current and planned actions and information on anticipated future projects to determine the potential for cumulative impacts. The potential for significant environmental consequences was evaluated utilizing the context and intensity considerations as defined in CEQ regulations for implementing the procedural provisions of NEPA (40 CFR 1508.27).

5.1 Air Quality

Under requirements of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) established National Ambient Air Quality Standards (NAAQS) for six criteria pollutants: carbon monoxide (CO), nitrogen dioxide (NO₂), ozone (O₃), particulate matter (PM), sulfur dioxide (SO₂) and lead (Pb), and defined the allowable concentrations that may be reached, but not exceeded, in a given time period to protect human health (primary standard) and welfare (secondary standard) with a reasonable margin of safety.

Primary and secondary standards for NAAQS have been established for most of the criteria pollutants. The EPA is authorized to designate those locations that have not met the NAAQS for the six criteria pollutants mentioned above as “nonattainment”, meaning the designated area has not attained the applicable air quality standard.

Each year, states are required to submit an annual monitoring network plan to EPA. The network plans provide for the creation and maintenance of monitoring stations in accordance with EPA monitoring requirements specified in 40 CFR (Code of Federal Regulations) Part 58. The state of Iowa’s most recent Monitoring Network Plan was approved by EPA Region 7 in December 2010.

The Ambient Air Quality division of the University of Iowa Hygienic Laboratory (UIHL) works in conjunction with the Iowa Department of Natural Resources and the EPA to preserve the air quality of the state. UIHL maintains a network of instruments and devices located throughout the state to monitor ambient air with the exception of Linn and Polk Counties, whose air monitoring networks are maintained by their respective health departments. A map of the air monitoring network and historical air quality monitoring data maintained by UIHL can be found at the following web address: <http://www.uhl.uiowa.edu/services/ambient/>. The nearest Air Quality Monitoring System location to the Proposed Action is located at the Hoover School, 2200 East Court, in Iowa City.

5.1.1 No Action

The No Action Alternative would not affect air quality. No construction activities would occur with the

selection of the No Action Alternative.

5.1.2 Proposed Action

Under this alternative, construction of the Proposed Action would require the excavation of soil and the operation of construction equipment. Short-term emissions of some criteria pollutants would occur during the construction phase. Construction equipment and the personal vehicles of construction personnel would generate exhaust emissions. The operation of motor vehicles on unpaved surfaces and the use of earth moving equipment may also generate particulate matter during dry periods. The moving and handling of soil during construction would increase the potential for emissions of fugitive dust; however, any deterioration of air quality would be a localized, short-term condition that would be discontinued when the project has been completed and disturbed soils have been stabilized or paved. The Proposed Action would require approximately 30 months of construction, but heavy equipment including bulldozers and scrapers will operate for only a relatively small portion of that time. Construction activities would be required to minimize fugitive dust emissions through watering or other measures to reduce the entrainment of particulate matter. Increases in ambient concentrations of the criteria pollutants resulting from heavy equipment would be minimal, and federal or state air quality attainment levels would not be exceeded. Construction of the Proposed Action is expected to have no long-term adverse impacts on the air quality of the area.

Mitigation

- Construction activities would be required to minimize fugitive dust emissions through watering, controlling entrainment of dust by vehicles, and/or other measures to reduce the disturbance of particulate matter.
- During site preparation and construction, the contractor would:
 - Minimize land disturbance;
 - Suppress dust on traveled paths that are not paved through wetting, use of watering trucks, chemical dust suppressants, or other reasonable precautions to prevent dust from entering ambient air;
 - Cover trucks when hauling soil;
 - Minimize soil track-out by washing or cleaning truck wheels before leaving the construction site;
 - Stabilize the surface of soil piles; and
 - Create wind breaks.
- During site restoration, the contractor would:
 - Revegetate any disturbed land not used with native species in accordance with Executive Order (EO) 13112
 - Remove unused material, and
 - Remove soil piles via covered trucks.

In the long-term, operation of the Proposed Action alternative will decrease the total emission of criteria pollutants because modern energy-saving design and materials proposed for construction, not found in the current flood-damaged structure, will be utilized. More efficient use of energy for heating and cooling will require less demand for energy produced by the consumption of fossil fuels or other carbon-based energy sources.

LEED, Leadership in Energy and Environmental Design, is an internationally recognized green building certification system developed by the U.S. Green Building Council. LEED promotes sustainable building and development practices through a rating system. LEED rates building design on a 100 point scale: 40+ certified, 50+ silver, 60+ gold, and 80+ platinum. The new Hancher Auditorium is designed to qualify at a minimum for a LEED rating of gold.

5.2 Biological Resources

Vegetation, wildlife, and the habitats in which they occur are collectively referred to as biological resources. Biological resources present at the Proposed Action construction site are detailed in a report conducted by Graham Environmental Services, Inc. (Appendix C, Section 2). The biological resources study consists of reviews of aerial images, historical land use, and rare and declining species, and a site-specific field survey that was performed on September 8, 2011.

5.2.1 Protected Species and Habitat

The Endangered Species Act (ESA) of 1973 established a Federal program to conserve, protect, and restore threatened or endangered plants and animals and their habitats. The ESA specifically charges Federal agencies with the responsibility of using their authority to conserve threatened or endangered species. All Federal agencies must ensure any action they authorize, fund, or carry out is not likely to jeopardize the continued existence of an endangered or threatened species or result in the destruction of critical habitat for these species.

Existing records on rare species and significant natural communities in the vicinity of the Proposed Action site were reviewed by the Iowa Department of Natural Resources (IDNR). IDNR found no site-specific records that indicate rare species or significant natural communities would be impacted (Appendix C, Section 1). A survey for rare plant species at the Proposed Action construction site are detailed in a report conducted by Graham Environmental Services, Inc. (Appendix C, Section 3). No State or Federally listed plant species were found at the Hancher site. However there are known mussel species within the channel of the Iowa River.

5.2.2 No Action

The No Action Alternative would not impact vegetation or wildlife in the project area. No construction activities would occur with the selection of the No Action Alternative.

5.2.3 Proposed Action

FEMA has determined from documentation review and a field visit to the project area that rare species or significant natural communities were not present in the area and would not be impacted by the project. No State or Federally listed plant species were found at the Hancher site. The site had been utilized for development since at least the 1930s. In the event that threatened or endangered species are encountered in the project area, the Iowa Department of Natural Resources and the USFWS should be notified. Sediment and erosion control appropriate to the site will be required under 5.4.2 Geology, Seismicity, and Soils which is

expected to prevent impacts to the species in the channel of the river which is complimented by the distance of the proposed site from the river.

5.3 Cultural Resources

In addition to review under NEPA, consideration of impacts to cultural resources is mandated under Section 106 of the National Historic Preservation Act (NHPA), as amended and implemented by 36 CFR Part 800. Requirements include the identification of significant cultural resources that may be impacted by the undertaking. Cultural resources are prehistoric and historic sites, structures, districts, buildings, objects, artifacts, or any other physical evidence of human activity considered important to a culture, subculture, or community for scientific, traditional, religious, or other reasons.

Only those cultural resources determined to be potentially significant under NHPA are subject to protection from adverse impacts resulting from an undertaking. To be considered significant, a cultural resource must meet one or more of the criteria established by the National Park Service that would make that resource eligible for inclusion in the National Register of Historic Places (NRHP). The term “eligible for inclusion in the NRHP” includes all properties that meet the NRHP listing criteria, which are specified in the Department of Interior regulations Title 36, Part 60.4 and NRHP Bulletin 15. Sites not yet evaluated may be considered potentially eligible for inclusion in the NRHP and, as such, are afforded the same regulatory consideration as nominate properties. Whether prehistoric, historic, or traditional, significant cultural resources are referred to as “historic properties.”

For the purposes of this analysis, the term “Area of Potential Effects” (APE) as defined under cultural resources legislation, defines all cultural resources at each alternative’s site and encompasses areas requiring ground disturbance (e.g. areas of grading, cut and fill, etc) associated with the proposed development of the Hancher Auditorium.

5.3.1 Archaeological

5.3.1.1 No Action

The No-action Alternative would not include any construction activities for a relocation facility, therefore no ground disturbing activities would occur, and no archeological resources would be affected with the selection of the No-action Alternative.

5.3.1.2 Proposed Action

The site proposed for the new HA is limited to a parcel featuring open green space and some campus roads, currently owned by the University along Park Road north of the existing facility. There are no existing standing structures on the site, so all ground disturbing activities for the proposed action will relate to the construction of the new auditorium. FEMA has considered the potential for this undertaking to affect archaeological resources. Various sources were checked to determine if any previously identified historic properties, including archeological sites are located within the APE of this undertaking and to determine the potential for the APE to contain previously unidentified historic properties. This review included the NRHP and National Historic Landmarks Databases, and the Office of the State Archaeologist’s (OSA) I-Sites GIS and Database, historic

maps and aerial photographs available through the Iowa Geographic Map Server at Iowa State University and the University of Iowa Libraries' Iowa Digital Library. During informal consultation with the State Historic Preservation Office, it was determined that the proposed relocation site for HA has been previously disturbed by nonextant development, which has been replaced by the current open green space and has low potential for pre-historic or historic period archaeology, therefore FEMA, in consultation with the State Historic Preservation Office (SHPO) has determined that no archaeological survey work or monitoring is required in advance of or during site preparation and construction for the HA replacement facility.

The Proposed Action replaces the functions of the original facility. The abandonment of the facility facilitates demolition; therefore the proposed action as defined will result in ground disturbing activities associated with the demolition of the original facility. FEMA consulted with the SHPO and determined that the site of the original HA was previously profoundly disturbed and therefore no archaeological survey work or monitoring is required in advance of or during demolition of the original facility.

5.3.2 Historic

5.3.2.1 No Action

The No-action Alternative, would result in no construction of the replacement facility, and would have no significant effect on cultural resources within the project area. No construction activities would occur with the selection of the No-action Alternative.

5.3.2.2 Proposed Action

The site proposed for the new HA is limited to a parcel featuring open green space and some campus roads, currently owned by the University along Park Road north of the existing facility. There are no existing standing structures on the site; however the site selected is located within the boundaries of an historic district identified during FEMA's flood recovery efforts at the University of Iowa.

On January 30, 2009 Iowa Homeland Security and Emergency Management Division (IHSEMD) surveyors completed a survey: *Historical and Architectural Reconnaissance Survey for 2008 Flood Properties at the University of Iowa, Iowa City, Johnson County*. The SHPO concurred with the surveyor's NRHP eligibility recommendations for the properties in a letter to IHSEMD dated March 4, 2009. The survey report was revised July 2, 2009, and the SHPO confirmed the previous concurrence, and concurred with the NRHP eligibility determination for the *University of Iowa River Valley Historic District* in a letter to IHSEMD dated July 14, 2009. Based on the surveyor's opinions of NRHP eligibility stated in the report; and in accordance with 36 CFR Part 800.4 Identification of Historic Properties; FEMA determined that the *University of Iowa River Valley Historic District* meets the criteria for listing in the NRHP under Criteria A, B and C and the SHPO concurred in a letter dated April 9, 2010.

FEMA has consulted with the SHPO on this undertaking to relocate Hancher Auditorium to a location within the boundaries of the *University of Iowa River Valley Historic District*. FEMA determined and the SHPO concurred that the construction of a new facility, as proposed, at the selected site within the boundaries of the historic district, would result in no Adverse Effects to Historic Properties.

The original facility has been determined eligible for listing in the NRHP both individually and contributing to the *University of Iowa River Valley Historic District*. The Proposed Action replaces the functions of the original facility. The abandonment of the facility facilitates demolition; therefore the proposed action as defined will result in adverse effects to historic properties. FEMA has initiated the process to resolve adverse effects to historic properties by working with the SHPO, and all interested parties to develop a Memorandum of Agreement (MOA) to stipulate measures required to minimize or mitigate the adverse effects. The resultant MOA and successful completion of the mitigation measures stipulated in the agreement is evidence of FEMA's compliance with its statutory responsibilities under section 106 of the NHPA.

5.4 Geology, Seismicity and Soils

Proposed construction for the replacement for Hancher Auditorium is set on high terraces of the Iowa River. The site will be re-contoured to a construction elevation a minimum of two feet above the 500-year flood event. The topography of the proposed site slopes generally to the south and east toward the Iowa River. Toward the east side of the proposed construction site and paralleling the river, there is a subtle change in the spacing of the topographic contours that delineate the boundaries of the 500-year floodplain.

Iowa is generally located in a zone of low seismic activity. Iowa City is located in the Uniform Building Code seismic zone classification area 0. The 0 classification is the lowest classification used, meaning the probability of an earthquake that may cause damage to buildings is minimal.

Information from the U.S. Department of Agriculture Natural Resources Conservation Service (NRCS) shows that three (3) soil types are present within the construction area. Soils found at the proposed project area are: Fayette silt loam, Sattre Loam, and Bertrand silt loam. The predominant soil is Fayette silt loam (Appendix A, Figure 5). Fayette silt loam is mapped with two ranges of slope, 5 to 9 percent, and is primarily on the northwest half of the proposed project area. Fayette silt loam consists of very deep, well drained soils formed in loess. Fayette Series soils are not saturated within a depth of approximately 6 feet during the wettest periods of years with normal precipitation. The topographic position of Fayette soils is not prone to frequent flooding. Sattre loam is mapped with 0 to 2 percent slopes. The series is located in the northeast portion of the construction area, mostly outside of the proposed UI Auditorium footprint. Sattre loam consists of very deep, well drained soils. Sattre Series soils are not frequently saturated within a depth of approximately 6 feet during the wettest periods of years with normal precipitation. The series is very rarely or rarely flooded for brief duration. Bertrand silt loam is mapped with 1 to 3 percent slopes and is found in the southern portion of the proposed construction area. Bertrand silt loam consists of very deep, well drained soils. Bertrand Series soils are found on stream and lake terraces. Because the Proposed Action site has been previously developed, much of the original soil profile has been disturbed.

The Farmland Protection Policy Act (FPPA) was enacted in 1981 (P.L. 98-98) to minimize the unnecessary conversion of farmland to nonagricultural uses as a result of Federal actions. In addition, the act seeks to ensure that Federal programs are administered in a manner that will be compatible with State and Local policies and programs that have been developed to protect farmland. The policy of the Natural Resources Conservation Service (NRCS) is to protect significant agricultural lands from conversions that are irreversible and that result in the loss of essential food and environmental resources. The U.S. Department of Agriculture states that proposed projects on land already in urban development or water storage are not subject to FPPA provisions (U.S. Department of Agriculture, 1986). The site of the proposed new Hancher Auditorium is within

the limits of Iowa City and surrounded by urban development. The proposed site has not been cultivated to agricultural production and has been developed to urban residential uses since at least the 1930's. An aerial photo of how the area appeared circa-1950s may be found in Appendix B, Figure 2.

5.4.1 No Action

The No Action Alternative would not affect geology and soils. No construction activities would occur with the selection of the No Action Alternative.

5.4.2 Proposed Action

The construction of the new Hancher Auditorium would result in disturbance of surface soils in the project area. Implementation of Best Management Practices (BMPs) identified in an applicable Storm Water Pollution Prevention Plan (SWPPP) required by an NPDES storm water permit would minimize soil erosion and loss until construction is complete and the site is permanently stabilized. Therefore, the Proposed Action would have little or no impact to geology and soils. Non-structural BMPs may utilize the minimization of disturbance, preservation of existing vegetation and re-vegetation of exposed slopes and soils to minimize erosion and to stabilize slopes. Erosion control BMPs include the placement of mulch or sowing of grass and the covering of soil stockpiles. Structural sediment control BMPs include silt fencing and sediment traps.

5.5 Land Use and Planning

The proposed site of the new Hancher Auditorium is located immediately north of the flood-damaged facility on land owned by the UI since at least 1972. Most of the proposed construction site is currently occupied with lawn and mature trees with a portion of the west side occupied by the exit drive that serves the Hancher parking lot and formerly served the flood-damaged facility. The exit drive will be closed and demolished to allow for construction of the new auditorium.

To the northwest of the proposed construction site is the Levitt Center for the University Advancement, an office building owned by the University. To the south and southwest are flood-damaged buildings and parking lots on areas of land owned by the UI since at least 1972. Most of the proposed construction site is currently occupied with lawn and a few mature trees with a portion of the west side occupied by the exit drive that serves the Hancher parking lot and formerly served the flood-damaged facility.

Iowa City is divided into ten geographically designated planning districts. The site of the Proposed Action is located in the extreme east side of the Northwest Planning District. However, planning for the UI campus is under the auspices of the State of Iowa, and the UI is exempt from the City's development and zoning regulations.

5.5.1 No Action

The No Action Alternative would have no significant effect on land use and planning. This alternative would not involve any construction, improvements, or ground disturbance to the project.

5.5.2 Proposed Action

Land required for the Proposed Action has been owned by the UI for many years and is currently in use as part of the Hancher Auditorium setting and access drive. The construction of the replacement for Hancher Auditorium at the proposed site will have no impact on designated land-use. Planning for the UI campus is under the auspices of the State of Iowa, and the UI is exempt from the city's development and zoning regulations.

5.6 Hazardous Substances

Hazardous materials and wastes are regulated in Iowa by a combination of federal and state laws. Federal regulations governing the assessment and disposal of hazardous wastes include the Resource Conservation and Recovery Act (RCRA), the RCRA Hazardous and Solid Waste Amendments, the Comprehensive Environmental Response, Compensation and Liability Act and the Toxic Substances Control Act.

The potential for soil contamination is unknown, however if contamination is present, the University will be required to coordinate with the Iowa Department of Natural Resources prior to proceeding with the project. The nearest DNR Field Office is #6 located in Washington, south of Iowa City.

5.6.1 No Action

The No Action Alternative would have no significant effect on unidentified hazardous or contaminating substances. This alternative would not involve any construction, improvements, or ground disturbance to the project.

5.6.2 Proposed Action

Based on a review of historical aerial photographs, the location of the Proposed Action previously contained apparent residential properties prior to its development as part of Hancher Auditorium, Appendix B Figure 2. Demolition of the residential property structures appears complete or nearly complete in the 1970s before construction of Hancher Auditorium was finished. It is unknown how the demolitions were performed or if asbestos and/or lead surveys were conducted prior to demolition, but based on the timeframe, demolition occurred prior to enactment of regulations for asbestos or lead paint. No known underground storage tanks containing or having contained heating oil or other petroleum-based fluids are present in the area. Other sources of potential contamination are unknown on the site. A series of known wells are located within the entrance / exit loop off of Park Road and under the parking lot and potentially the Levitt Center.

In the event that soil and/or groundwater contamination is discovered during construction activities, the Iowa Department of Natural Resources (IDNR) should be contacted at Field Office #6 (319) 653-2135. Work within the Proposed Action area should not resume until IDNR personnel indicates no further assessment of the discovery is necessary.

5.7 Noise

The Noise control Act was enacted in 1972 (P.L. 92-574). EPA does not have regulatory authority governing noise in local communities. In 1982, the EPA shifted federal noise control policy and transferred the primary responsibility of regulating noise to state and local governments. The Noise Control Act of 1972 and the Quiet Communities Act of 1978, however, were not rescinded by congress and remain in effect. Inadequately controlled noise presents a growing danger to the health and welfare of the nation's population. The major sources of noise include transportation vehicles and equipment, machinery, appliances, other products in commerce, climate, and recreation. Sounds which disrupt normal activities or otherwise diminish the quality of the environment are designated as noise. Noise can be stationary or transient, intermittent or continuous. Noise is considered unwanted sound and is typically measured in decibels (dB). The day-night average sound level (Ldn) is the 24 hour average sound level and is used by agencies for estimating sound impacts and establishing guidelines for compatible land uses. The U.S. Department of Housing and Urban Development

(HUD) regulations set acceptable noise levels at 65 Ldn or less (24 CFR Part 51, Subpart B). Typical residential construction codes require a minimum exterior to interior insertion loss, or noise reduction, of 20dBA. The EPA identifies a 24-hour exposure level of 70 decibels (dB) as the level of environmental noise which will prevent any measurable hearing loss over a lifetime. Likewise, levels of 55 dB outdoors and 45 DB indoors are identified as preventing activity interference and annoyance (e.g., spoken conversation, sleeping, working, recreation). The levels represent averages of acoustic energy over long periods of time such as 8 hours or 24 hours rather than single events (<http://www.epa.gov/history/topics/noise/01.htm>). These noise levels are contained in a new EPA document, "Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety". According to the Iowa City code, "any noise that interferes with the comfortable enjoyment of life or property of the neighborhood" is forbidden. The city does not authorize amplified sound in a residential area with the exception of events held at churches or schools.

5.7.1 No Action

The No Action Alternative would not affect noise levels within the proposed project area or the surrounding community. No construction activities would occur with the selection of the No Action Alternative.

5.7.2 Proposed Action

The Proposed Action could result in short-term increases in noise levels in the vicinity of the project area caused by construction. Construction activities would generally be limited to daylight hours and weekdays, therefore, would not affect ambient noise levels at night or on weekends in surrounding areas. The proposed project would require approximately 30 months to construct and the use of heavy equipment. Noise levels during certain phases of construction, such as the advancement of pilings or grading with heavy mobile equipment, may be present in the immediate construction area, but are not anticipated to cause significant impact to receptors in neighboring areas.

Long term increases in noise are not anticipated. The Proposed Action is a replacement for an existing facility utilized for the same functions up until the flooding of 2008. The site of the Proposed Action is distant from residential neighborhoods or other noise receptors. The nearest residence is approximately 600 feet from the

site to the west. The Levitt Center for University Advancement is the closest non-residential noise receptor. No sensitive noise receptors are located near the project area. The Proposed Action is expected to have no long-term adverse impacts on the noise quality of the area.

5.8 Socioeconomic Considerations

On February 11, 1994, President Clinton signed Executive order (EO) 12898, “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations”. The EO directs Federal agencies to focus attention on human health and environmental conditions in minority and/or low-income communities. Its goals are to achieve environmental justice, fostering non-discrimination in Federal programs that substantially affect human health or the environment, and to give minority or low-income communities greater opportunities for public participation in the access to public information on matters relating to human health and the environment. Also identified and addressed, as appropriate, are any disproportionately high and adverse impacts on human health, or environmental effects of Federal programs, policies, and activities on minority and low-income populations in the United States.

The data used for this environmental justice analysis was taken from the 2000 Census (U.S. Census Bureau, 2000) as the 2010 Decennial Census data is not sufficiently available for this analysis as of the time of this writing. The construction footprint for the Proposed Action falls within Census Tract 18, block group 2 of Johnson County. As of the 2000 census, there were 62,220 people and 25,202 households residing in Iowa City. The 2008 American Community Survey (ACS) estimates the Iowa City population at 84,507; however estimation methods for the ACS differ from those used for the Decennial Census potentially limiting the functional comparison with the 2000 population. Compared to the rest of Iowa City, this area has a greater proportion of minority residents, exceeding the City’s proportion by 6.8%. The white population of this area is 80.53% followed by 9.34% African American and 5.13% Asian compared to the city’s proportions of 87.33%, 3.75% and 5.64% respectively. Additionally, 5.51% of area residents report Hispanic or Latino heritage compared to the overall city proportion of 2.95%. A greater proportion (27.6%) of the area population is under 18 than for the rest of the city (2.7%); this comparison is potentially distorted by the large student population of Iowa City. At the same time, there is a smaller proportion of area population over the age of 64 (3.3%) than for the rest of the City (7%). Median age for Iowa City is 25.4 while the median age of the proposed project area is 27.5. There are 1,348 households in the proposed project area with median household size of 2.45 compared to median size of 2.23 for Iowa City as a whole. The proportion of the population (71.6%) of the area with families is greater than the proportion for the rest of the city (52.1%) with average family sizes of 2.99 as opposed to family sizes for the whole city at 2.90 on average.

Table 5-1: Total minority and below poverty level populations.

| Geography | Minority Status (SF1 Data) | | | Poverty Status (SF3 Data) | | |
|---------------|----------------------------|---------------|------------|---------------------------|--------------|------------|
| | Total | Minority Pop. | Percentage | Total | Poverty Pop. | Percentage |
| Iowa City | 62,220 | 1,048 | 1.68% | 56,302 | 12,234 | 21.73% |
| Block Group 2 | 3,374 | 657 | 19.47% | 3,358 | 589 | 17.54% |

Note: The difference between the total columns for Minority and Poverty status is due to Census methodologies between SF1 Data and SF3 Data. SF1 Data represents a 100% count whereas SF3 data results from estimating methods for confidentially protection.

Median household incomes within the area are \$38,897 while the same figure for the city as a whole is \$34,977. A smaller proportion of the area population (17.5%) was determined to be below the poverty threshold than for the City as a whole (21.75). These figures may be distorted slightly by the large student population of the City, which is largely clustered outside of the proposed project area.

Table 5-2: Population Statistics 1980-2000

| Jurisdiction | 1980 | 1990 | 2000 |
|---------------------|-------------|-------------|-------------|
| Iowa | 2,913,808 | 2,776,755 | 2,926,324 |
| Johnson County | 81,717 | 96,119 | 111,006 |
| Iowa City | 50,508 | 59,738 | 62,220 |

5.8.1 No Action

The No Action Alternative would have no impact to the socioeconomics of the local area because no construction activity would occur.

5.8.2 Proposed Action

Construction of the new Hancher Auditorium under this alternative would result in a positive impact with an influx of construction workers needed for the approximately 30 months of construction activities. Construction personnel would provide short-term benefits to the local businesses, which would include the purchase of food, gas, and other services. The Proposed Action will also complete a necessary service for the Iowa City residents and businesses and would not displace or adversely affect any nearby residents or minority populations during the construction phase. The surrounding land uses are public facilities and open space, which combined with the proposed auditorium, may provide a positive attraction and further opportunities to the area. The concentration of families and children in the project area as defined may benefit by the proximity and access to the services and resources available through the Hancher Auditorium. The implementation of the proposed alternative would have little likelihood of having disproportionate long term adverse impacts on any low-income or minority populations. The land-use improvements would be beneficial to the area and would not cause adverse environmental or economic impacts specific to any groups or individuals.

5.9 Transportation

The proposed project area is located immediately south of and accessed via Park Road, an arterial roadway designed to carry greater traffic loads than residential streets. Some additional temporary traffic load, including truck traffic with loads of construction materials and vehicles transporting construction personnel is anticipated.

The selection of the proposed site included circulation criteria including vehicular access and traffic impacts; parking availability; event, daily use and school bus parking; service access; CAMBUS access; and pedestrian access. CAMBUS is a no-fare University of Iowa bus service providing students, faculty, staff and the general public with nearly 4 million rides per year throughout the UI campus.

To the northeast of the Proposed Action is a bridge that extends Park Road over the Iowa River to intersect with Dubuque Street. Dubuque Street is an arterial street with access to Interstate 80. The City of Iowa City has plans to replace, elevate and widen the Park Road Bridge. The bridge will be relocated a short distance to the south of the existing bridge in alignment with Park Road and widened to five lanes. There are plans to widen Park Road where it accesses the Proposed Action site to three lanes.

5.9.1 No Action

With the No Action Alternative, the damaged Hancher Auditorium would not be relocated and there would be no impact to the existing traffic and circulation in the area.

5.9.2 Proposed Action

Under this alternative, the construction of the new UI Auditorium at the proposed site may cause sporadic, brief disruptions of traffic flow on Park Road during the approximately 30 month construction period. Local traffic would need to slow down or stop to accommodate the transit of heavy equipment used during construction. Flagmen and possibly escort vehicles, as appropriate, would be used to sustain traffic flow while maintaining safe working and traffic conditions. This activity would have a short-term effect on the level of service for the connecting roads during the construction period. This level of service would, however, be expected to return to a comparable pre-disaster level upon completion of the project.

5.10 Water Resources

Executive Order (EO) 11990 (wetlands) requires federal agencies to avoid, to the extent possible, adverse impact of wetlands. EO 11988 (floodplain management) requires the federal government to minimize the occupancy and modification to floodplains. Specifically, EO 11988 prohibits federal agencies from funding new construction in the 100-year floodplain, or 500-year floodplain for a “critical action” (e.g., Hospital, Fire Station), unless there are no practical alternatives.

The U.S. Army Corps of Engineers (USACE) is responsible for permitting and enforcement functions dealing with building in U.S. waters and discharging dredged fill material into U.S. waters. USACE regulations for building or working in navigable waters of the United States are authorized by the Rivers and Harbors Act of 1899. These regulations coincide with Section 404 of the Clean Water Act, which establishes the USACE permit program for discharging dredged or fill material. The regulations are often used concurrently because building in navigable waters of the United States also constitutes discharging dredged or fill material into waters of the United States. In addition to regulating construction or work being done in navigable waters of the United States, USACE regulates discharging into wetlands through the Section 404 permit program.

5.10.1 Wetlands

Wetlands are defined by the USACE as “those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas”. EO 11990, Protection of the Wetlands, requires Federal agencies to take action to minimize the destruction or modification of wetlands by considering both direct and indirect impacts to wetlands that may result from federally funded actions.

A site visit was conducted on September 8, 2011 to assess the occurrence of wetlands and is detailed in a report by Graham Environmental Services, Hancher Site – Wetland Delineation Report (Appendix D). The site was assessed for wetlands using the on-site methods contained in the “Routine Determination” section of the USACE “Wetlands Delineation Manual” and “Interim Regional Supplement to the Corps of Engineers Wetlands Delineation Manual: Midwest Region”. This is the methodology currently used to determine wetlands by the USACE for implementation of Section 404 of the CWA. Wetlands were not discovered.

5.10.1.1 No Action

The No Action Alternative would not affect wetlands. No construction activities would occur with the selection of the No Action Alternative.

5.10.1.2 Proposed Action

A review of the U.S. Fish and Wildlife Service National Wetlands Inventory Map indicates no wetlands are located on the proposed project site. The nearest mapped wetland is the Iowa River located approximately 400 feet to the east classified as RU2BH (Riverine Lower Perennial Unconsolidated Bottom Permanently Flooded). Other wetlands on the same side of the Iowa River as the Proposed Action site are located upstream across Park Road. The contractor will implement specific BMP to reduce or eliminate runoff impacts during proposed construction activities of the proposed action and to reduce the potential for soil erosion after construction (see 5.4.2). The project is not expected to have any impact on wetlands.

5.10.2 Floodplain

EO 11988 requires that a Federal Agency avoid direct or indirect support of development within the 100-year floodplain whenever there is a practicable alternative. According to FIRM Panel 19103C0195E dated February 16, 2007 and Letter of Map Revision (LOMR) 09-07-0834P effective June 30, 2009, the damaged location is located within the 100-year floodplain. FEMA uses Flood Insurance Rate Maps (FIRMs) to identify the regulatory 100-year floodplain for the NFIP. While Hancher Auditorium is not considered a “critical action” according to 44 CFR Part 9 and thus not required to be evaluated against the 500-year floodplain, the City of Iowa City has established the 500-year floodplain as a higher standard than FEMA’s requirements. The UI has chosen to use the City’s higher standard for its considerations on relocating Hancher Auditorium.

FEMA’s procedures for implementing EO 11998 (44 CFR Part 9, Section 9.6) include an eight-step review process that decision-makers must use when considering projects that have potential impacts to or within a

floodplain. However, the proposed new location for the art building will not be within the 100-year floodplain and thereby not require an eight-step review process.

5.10.2.1 No Action

With the No Action Alternative, the damaged Hancher Auditorium would not be relocated outside the floodplain. There would be no impact to existing conditions of the floodplain.

5.10.2.2 Proposed Action

Consistent with EO 11988, FIRMs were examined during the preparation of this EA. According to FIRM Panel 19103C0195E, dated February 16, 2007, the proposed new Hancher Auditorium is located outside the 500-year floodplain. The construction of the new Hancher Auditorium should not affect base flood levels or flood values or characteristics. The Proposed Action does not support occupancy or modification of floodplains, or directly or indirectly supports floodplain development.

5.11 Cumulative Impacts

The CEQ regulations for implementing NEPA require an assessment of cumulative effects during the decision-making process for federal projects. Cumulative effects are defined as “the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions” (40 CFR part 1508.7). Cumulative effects are considered for both the No Action and Proposed Action alternatives.

Reasonably foreseeable actions identified in the project vicinity that would have the potential to be included in the cumulative impact include the demolition of the current flood-damaged HVC complex. If the Hancher Auditorium is not relocated and rebuilt outside of the 100-year floodplain, the building would remain vulnerable to future flooding and dispersal of Hancher Auditorium functions would continue to negatively impact the quality of education the UI provides to students. Based on the effects to environmental resources previously described, the development of the site into the Hancher Auditorium would not pose a significant cumulative impact from the Proposed Action Alternative or adversely impact the University of Iowa, Iowa City or the surrounding area. The project’s potential adverse impacts are limited to those caused during construction. FEMA has determined that there are no additional cumulative impacts as a result of the effects beyond what has been discussed previously.

5.12 Coordination and Permits

In the event that archaeological deposits (soils, features, artifacts) are discovered during construction of the project, activities would cease in the immediate area, and the Iowa State Historic Preservation Office and the FEMA Regional Environmental Officer would be notified before work would continue (section 5.3 Cultural Resources). Work in sensitive areas cannot resume until a qualified archaeologist determines the extent of the discovery, consultations between SHPO and FEMA are complete, and the applicant has been notified by SHPO and FEMA. Because relocation of the facility results in abandonment of the original structure and

because the original structure is anticipated to be demolished, FEMA has initiated the MOA process in consultation with SHPO and interested parties to resolve adverse effects to historic properties.

Relocation of Hancher Auditorium would not require a building permit from the City of Iowa City. A general NPDES Permit for storm water management during construction will be required to be obtained from the IDNR. The UI or the UI's contractor will need to coordinate with the IDNR to evaluate the known wells on and adjacent to the proposed new site and will be required to follow the IDNR recommendations pertaining to the wells. If soil contamination is discovered, the University is required to contact the Iowa Department of Natural Resources Field Office #6 in Washington at (319) 653-2135 and comply with all State and Federal environmental requirements.

6. CONCLUSION

This draft EA evaluated potentially significant resources that could be affected. The evaluation resulted in identification of no significant impacts associated with the resources or current state of air quality, geology and soils; floodplains; wetlands and water resources; vegetation; biological resources (rare species); and socioeconomic and environmental justice issues. Obtaining and implementing permit requirements along with appropriate Best Management Practices will avoid or minimize any effects associated with the action. Should no significant impacts be identified during the public comment period, it is recommended that a Finding of No Significant Impact (FONSI) to the human or natural environment be issued for the Proposed Action Alternative.

7. PARTIES CONSULTED AND REFERENCES

7.1 Parties Consulted

Beverly Rodalino, Project Manager – Planning, Design & Construction, Facilities Management, 230 University Services Bldg., University of Iowa, 319-335-1294, Beverly-rodalino@uiowa.edu

Michael Paul Valde, Director, Environmental Compliance, Senior Associate Counsel, 350 University Services Building, University of Iowa, 319-335-6190, Michael-valde@uiowa.edu

Steve Henneberry, Environmental Services, Planning Design and Construction, Facilities Management, 200 University Services Building, University of Iowa, 319-335-6477, steve-henneberry@uiowa.edu

Robert Miklo, Senior Planner, Urban Planning, City of Iowa City, 410 E Washington Street, Iowa City, IA, 319-356-5240, robert-miklo@iowa-city.org

John Yapp, Executive Director, Transportation Planning, City of Iowa City, 410 E Washington Street, Iowa City, IA, 319-356-5252, john-yapp@iowa-city.org

Melissa Clow, Special Projects Administrator, Engineering Division, City of Iowa City, 410 E Washington Street, Iowa City, IA, 319-356-5413, melissa-clow@iowa-city.org

Susan Bowersox, AIA, Pelli Clarke Pelli / OPN Architects, Inc., 200 Fifth Ave. SE, Ste. 201, Cedar Rapids, Iowa 52401 www.opnarchitects.com

Douglas Jones, Review and Compliance Program Manager, State Historic Society of Iowa, 600 East Locust Street, Des Moines, IA 50319-0290

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8. LIST OF PREPARERS

8.1 Government Preparers

Eric Wieland, EHP Branch Director, Iowa Closeout Center, Federal Emergency Management Agency, Region VII

John Dawson, Environmental Specialist, Iowa Closeout Center, Federal Emergency Management Agency, Region VII

Ann Schmid, Historic Preservation Specialist, Iowa Closeout Center, Federal Emergency Management Agency, Region VII

8.2 Contractor Preparers

Neil DeRynck, BS Geology, MS Geology, Senior Project Manager, Seneca Environmental Services, Inc., Davenport, Iowa

Rich Vogel, BA Mathematics, PhD Economics, Senior Environmental Technician, Seneca Environmental Services, Inc., Davenport, Iowa

Kelly Miles, BS Biology, Environmental Technician, Seneca Environmental Services, Inc., Davenport, Iowa

Mike Graham, BS Parks and Leisure Services, Graham Environmental Services, Inc., Spring Green, Wisconsin

Daniel B. Shaw, BS Biology, Vegetation Specialist/Landscape Ecologist, Graham Environmental Services, Inc., Spring Green, Wisconsin

Resumes of contractor preparers may be found in Appendix F.