

Draft Environmental Assessment

Fort Jackson Football Stadium

Plaquemines Parish, Louisiana

October 2013

U.S. Department of Homeland Security
Federal Emergency Management Agency, Region VI
Louisiana Recovery Office
1 Seine Court
New Orleans, Louisiana 70114



FEMA

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LIST OF ACRONYMS

APE	Area of Potential Effects
BFE	Base Flood Elevation
CAA	Clean Air Act
CBRA	Coastal Barrier Resources Act
CBRS	Coastal Barrier Resources System
CFR	Code of Federal Regulations
CWA	Clean Water Act
CWPPRA	Coastal Wetland Planning, Protection, and Restoration Act
CZMA	Coastal Zone Management Act
EA	Environmental Assessment
EFH	Essential Fish Habitat
EIS	Environmental Impact Statement
EO	Executive Order
FEMA	Federal Emergency Management Agency
FJFS	Fort Jackson Football Stadium
FONSI	Finding of No Significant Impact
FPPA	Farmland Protection Policy Act
GOHSEP	Governor's Office of Homeland Security and Emergency Preparedness
LDEQ	Louisiana Department of Environmental Quality
LDNR	Louisiana Department of Natural Resources
LDWF	Louisiana Department of Wildlife and Fisheries
NAVD88	North American Vertical Datum 1988
NEPA	National Environmental Policy Act
NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NRCS	Natural Resources Conservation Service
NWI	National Wetlands Inventory
PA	Programmatic Agreement
SFHA	Special Flood Hazard Area
SHPO	State Historic Preservation Office/Officer
USACE	United States Army Corps of Engineers
USC	United States Code
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey

1.0 INTRODUCTION

1.1 Project Authority

Hurricane Katrina made landfall on August 29, 2005, in southeast Louisiana near Buras-Triumph, Plaquemines Parish as a Category 3 storm. Maximum sustained winds at landfall were estimated at 120 miles per hour and were accompanied by strong and damaging storm surge well above normal high tide. President George W. Bush declared a major disaster for the State of Louisiana and signed a disaster declaration (FEMA-1603-DR-LA) on August 29, 2005, authorizing the Department of Homeland Security's Federal Emergency Management Agency (FEMA) to provide federal assistance in designated areas of Louisiana.

The Plaquemines Parish Government requested through the State of Louisiana Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP) that FEMA provide disaster assistance through the provision of federal grant funding pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), PL 93-288, as amended. Section 406 of the Stafford Act authorizes FEMA's Public Assistance Program to fund projects to repair, restore, and replace facilities damaged as a result of the declared event.

Plaquemines Parish was deemed eligible by FEMA for federal disaster public assistance as an eligible applicant serving the needs of the general public. Before Hurricane Katrina, the Fort Jackson Football Stadium (FJFS) and appurtenant facilities in Buras, Louisiana in Plaquemines Parish provided facilities for recreation such as football games, baseball games, and tennis. The facility and its contents were damaged as a result of the declared event and FEMA deemed them eligible for repair and/or replacement.

Plaquemines Parish determined that reconstruction of the facility to its predisaster configuration in its existing location would not best meet the needs of the community. The Parish requested approval and federal grant funds for a change of location improved project to replace the eligible facilities with facilities providing similar functions at the Plaquemines Parish Consolidated Government Complex in Belle Chase, approximately 50 miles northwest of Buras, Louisiana. The proposed action includes construction of a new stadium and appurtenant facilities such as parking, roads, sidewalks, lighting, bleachers, concession stands, and supporting utilities (See Section 3 for Specific Site Location and Proposed Plans).

In accordance with 44 Code of Federal Regulation (CFR) for FEMA, Subpart B – Agency Implementing Procedures, Section 10.9, an Environmental Assessment (EA) is being prepared pursuant to Section 102 of the National Environmental Policy Act (NEPA) of 1969, as implemented by the regulations promulgated by the President's Council on Environmental Quality (40 CFR Parts 1500-1508). This EA will determine if the proposed change of location improved project for the Fort Jackson Football Stadium facilities will have the potential for significant adverse effects on the quality of the human and natural environment at or near the proposed project. The results of this EA are being used to make a decision whether to initiate preparation of an Environmental Impact Statement (EIS) or to prepare a Finding of No Significant Impact (FONSI).

1.2 Area Description

Plaquemines Parish is located in southeastern Louisiana, southeast of the City of New Orleans. The largest and southernmost parish in Louisiana, Plaquemines Parish is a peninsula that covers some 90 miles south of New Orleans, which is bisected by the Mississippi River. Despite the size, very little of the parish is dry land (5 percent); with most of it being water or low-lying marsh wetland (Plaquemines Parish Master Plan, 2011). Although not developable by conventional standards, the wetlands and water areas of the parish are arguably the most used and productive areas of the parish.



The parish lies along both banks of the Mississippi River from Orleans Parish in the north to the Gulf of Mexico, the southern boundary. Plaquemines Parish is also bordered by Jefferson Parish to the west, St. Bernard Parish to the east, and Orleans Parish to the north. The total land area of the parish is approximately 1,986 square miles. The population was 26,757 in 2000 and had decreased to 22,512 (estimated) or approximately 15.9 percent less in 2006, after Hurricane Katrina (FEMA, 2008). The economy of the area is predominantly agricultural and industrial.

The principal crops consist of oranges and tomatoes. Plaquemines Parish has a significant seafood industry exporting millions of pounds of shrimp, oysters, and crabs. Industries are related to offshore oil exploration and production as well as port facilities afforded by the Mississippi River. The Port of Plaquemines is one of the largest seaports in the United States. State Routes 23 and 39 are the major arteries paralleling the Mississippi River on the west and east banks, respectively. Many other state and parish roads supplement land transportation within the parish. Railroad service is provided on the west bank by the New Orleans and Lower Coast Railroad. Many streams and bays (both natural and man-made) traverse Plaquemines Parish; many of these are navigable. The Mississippi River is the major waterway in the parish and much of the economy and culture of the area is derived from it.

The proposed project is located within the Mississippi Alluvial Plains ecoregion of Louisiana, which is composed of a broad, mostly flat alluvial plain with river terraces, swales, and levees providing the main elements of relief. Winters are mild and summers are hot, with temperatures and precipitation increasing from north to south. Bottomland deciduous forest covered the region before much of it was cleared for cultivation. The ecoregion contained one of the largest continuous wetland systems in North America. The widespread loss of forest and wetland habitat, however, has impacted wildlife and reduced bird populations (Ecoregions of Louisiana, 2006). Today, constructed levees restrict the river from overflowing, opening large areas for extensive agricultural use.

The climate of the area is subtropical and is strongly influenced by the Gulf of Mexico. Extreme temperatures are seldom experienced and the average temperatures range from 83 degrees Fahrenheit (F) in the summer to 56 F in winter. The average annual precipitation is approximately 60 inches. The heaviest rainfall occurs between June and September and the least during the December-January period.

1.3 Project Location

Prior to Hurricane Katrina, the Fort Jackson Athletic Fields were located in Buras, Louisiana. The Athletic Field Complex consisted of a football field, baseball field, tennis courts, two stadium bleachers, a press box, two ticket booths, two concessions/restroom buildings, a running track and lighting. The facilities were all destroyed as a result of Hurricane Katrina. The applicant is requesting that the football stadium and appurtenant facilities be rebuilt at the future site of the Plaquemines Parish Government Complex located at F. Edward Hebert Boulevard, Belle Chasse, LA 70037 (Figures 1 through 3). The athletic facilities will be located adjacent to the Government buildings in the eastern portion of the parish-owned property (Latitude 29.8975, Longitude -89.9738) (Figures 2 and 3). The property is completely fenced and only allows entrance through the main entrance on E. Edward Hebert Boulevard. Currently, the site is composed of a completely fenced, flat, and semi-maintained lot.



Figure 1 – Fort Jackson Football Stadium Change of Location



Figure 2 - Project Location Aerial Overview Showing the Plaquemines Parish Government Complex and Nearby Land Use

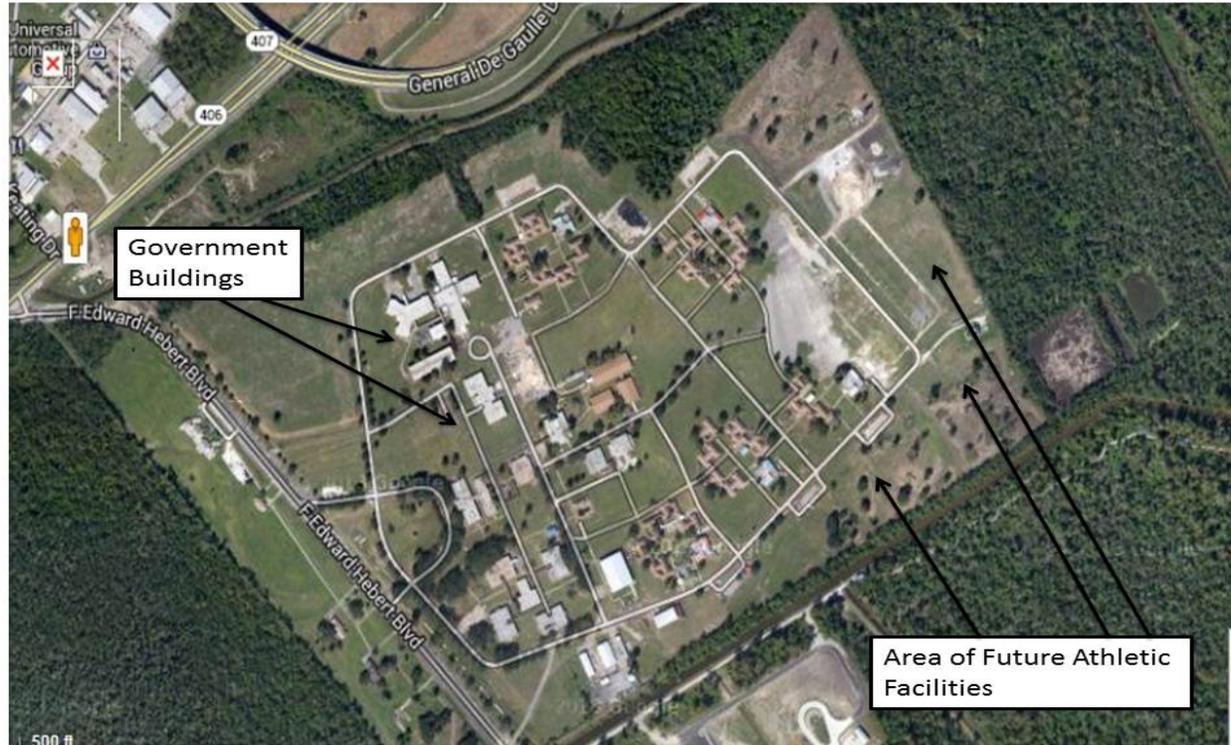


Figure 3 - Aerial View of Plaquemines Parish Government Complex Site

2.0 PURPOSE AND NEED

The objective of the FEMA Public Assistance grant program is to provide assistance to state, tribal, and local governments, and certain types of private nonprofit organizations so that communities can quickly respond to and recover from major disasters or emergencies. In order to restore the lost services, facilities and resources that were destroyed as a result of Hurricane Katrina, Plaquemines Parish seeks federal grant funds to replace the eligible FJFS buildings and facilities including their former contents (all appurtenant equipment, materials, and supplies) with improved facilities in Belle Chase, Plaquemines Parish, Louisiana.

The devastation to the FJFS and surrounding area caused by Hurricane Katrina and the subsequent need to rebuild forced a change in the development in the Parish and therefore, the Master Plan for the Plaquemines Parish Government facilities. In response to this change, a committee was formed and a Master Plan was developed that involves rebuilding in the existing Fort Jackson location only those facilities necessary in this flood prone coastal area and rebuilding other facilities at other PP facilities. It was decided that in order to mitigate future flood and storm losses, some of the PP facilities would be reconstructed in less hurricane and storm prone areas.

A change of location improved project has been proposed to construct a new FJFS in a less hurricane and flood prone area. The action seeks to restore similar functions of the damaged FJFS in Buras, Louisiana and to utilize available grant funding to construct a football stadium that will support community recreational activities. The action seeks to develop the FJFS site in accordance with a Master Plan, which meets the goals of Plaquemines Parish.

The purpose of this project is to support implementation of long-term community recovery plans, ensure community viability, and eliminate gaps in the resources available. The proposed improved project for the FJFS supports efforts to meet the needs of the community served.

3.0 ALTERNATIVES CONSIDERED

3.1 Alternative 1 – No Action

Implementation of the no action alternative would entail no repair or replacement of the FJFS facilities damaged by Hurricane Katrina. Consequently, the applicant would have diminished capabilities and resources due to the loss of the facility functions. Facilities could remain in a damaged condition, which would represent a risk to the community.

3.2 Alternative 2 – Reconstruct Improved Facilities at an Alternate Location (Proposed Action)

Plaquemines Parish seeks FEMA Public Assistance federal grant funds for a proposed project to replace eligible facilities lost at the Buras FJFS with improved facilities in a new location at the Plaquemines Parish Government Complex, i.e., the new FJFS. Plaquemines Parish determined that reconstruction of the original eligible facilities in their current location is undesirable due to the risk of loss in the next flood. Additionally, practicable alternatives in areas of the floodplain having lower flood risk were identified that meet the goals of Plaquemines Parish. The stadium and related facilities will be located in the eastern corner of the site (29.8881, -89.9746; 29.8989, -89.9736; 29.8982, -89.9729; 29.8975, -89.9738). The proposed action will include a football field, stadium seating and bleachers, ticket booths, concessions stands, restrooms, office space, storage areas, cooking areas, and locker rooms with showers (Figures 4 through 7).



Figure 4 - Preliminary Plan for the Fort Jackson Football Stadium (Plaquemines Parish Government, 2012)

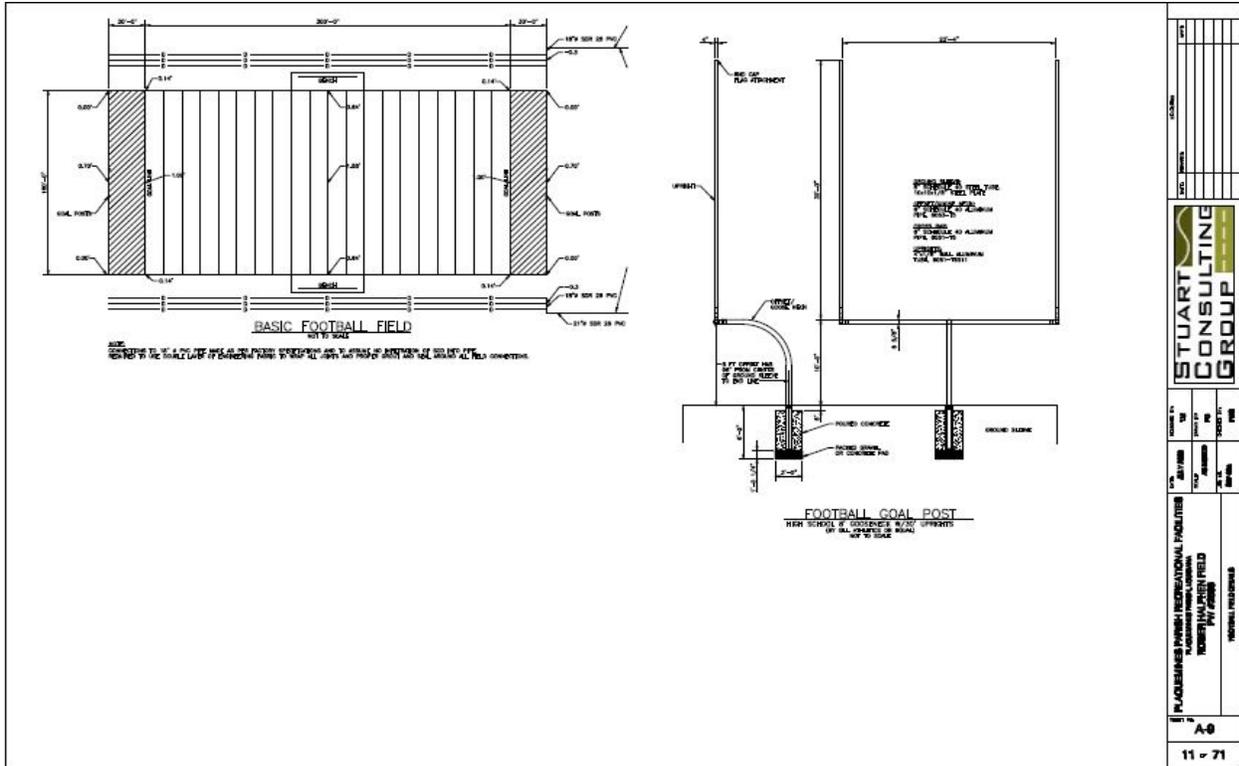


Figure 6 – Site Plans for Football Stadium

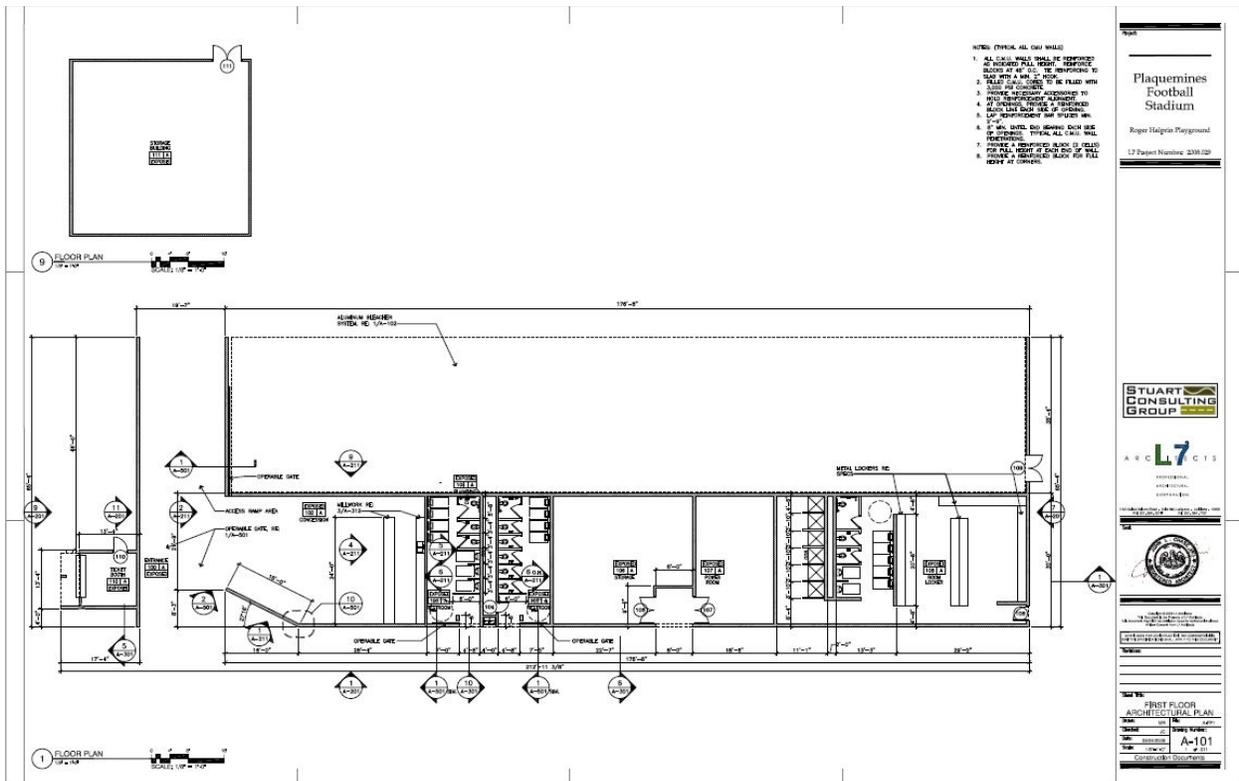


Figure 7 – Site Plan for Bleachers, Storage Building, Ticket Booth, and Lockers

3.3 Alternative 3 – Reconstruct at Original Site

This alternative would rebuild the damaged FJFS facility at the original site to pre-disaster configuration, function, and capacity (Figure 8). The facilities would be constructed within the respective original footprint and would include stringent and costly floodplain construction requirements.



Figure 8 - Fort Jackson Football Stadium - Reconstruct at Original Site

4.0 AFFECTED ENVIRONMENT AND POTENTIAL IMPACTS

This section provides a description of the current laws and regulations that govern certain areas of concern examined under NEPA. These laws and regulations are applied to the current physical environment or baseline conditions, for those areas of concern that may be affected by the proposed action or alternatives. The following areas of concern are discussed: geology and soils, air quality, surface water, wetlands, floodplains, threatened and endangered species and critical habitat, cultural resources, environmental justice, noise, traffic, public services and utilities, and hazardous materials and wastes.

4.1 Land Use and Zoning

Due to its location on the Mississippi River delta and its unique geography, the majority of the nearby land area suitable for development lies in two thin strips of levee protected land along the river. Parish land use includes agriculture (55%), industrial (14%), residential (13%), forest (11%), civic or institutional uses (4%), and miscellaneous other uses (Plaquemines Parish, 2010). The proposed project location lies in an area that is surrounded by marshland, community neighborhoods, an elementary school, and courthouse. Activities include agriculture, single family residential, and light industrial activities supporting the fishing community, port, and the oil and gas industries.

The Commission Council of Plaquemines Parish, for the purposes of promoting the health, safety, morals, convenience, order, prosperity and welfare of Plaquemines Parish has adopted and established the Zoning Ordinance of Plaquemines Parish in the state of Louisiana. This ordinance is known as the Comprehensive Zoning Ordinance of Plaquemines Parish, Louisiana. This zoning ordinance divides the parish into various types of districts, which represent a zoning plan with revisions and amendments. This plan contains regulations with respect to the location, height, size of yards, courts and other spaces; the density of population; and the use of buildings, structures, and land for trade, industry, business, resident or other purposes. The applicant must obtain and comply with a permit from the office of Permits, Planning and Zoning and will thereby ensure compatibility and compliance with parish zoning requirements.

Alternative 1 – No Action

The no action alternative would conform to local land uses and would not adversely impact nearby and adjacent land uses or zoning.

Alternative 2 – Reconstruct Improved Facilities at an Alternate Location (Proposed Action)

The proposed alternative must be properly permitted by the state of Louisiana and Plaquemines Parish and, thereby, would comply with land use regulatory codes, would not adversely impact nearby or adjacent land uses and zoning, or represent an incompatible land use with near and adjacent uses.

Alternative 3 – Reconstruct at Original Site

The reconstruct at original site alternative must be properly permitted by the state of Louisiana and Plaquemines Parish and, thereby, would comply with land use regulatory codes, would not adversely impact nearby or adjacent land uses and zoning, or represent an incompatible land use with near and adjacent uses.

4.2 Geology and Soil

Geology and soil are significant resources that could be adversely affected by project activities and the FJFS construction relies on an understanding of the stability of the geologic units in the project area. Geology is technically significant because of the potential of a project component to result in on- and off-site lateral spreading, subsidence, liquefaction, or collapse. People and structures can be exposed to loss, injury, or death if a geologic unit is not properly considered during design. Soils represent the youngest geologic unit in contact with the FJFS structure and appurtenances. As such, they can have a significant impact on the performance of foundations and other building components due to compaction, liquefaction, or stability. Soils are also the earth layer most directly impacted by disturbance during construction; factors such as erodibility, loss of productivity, and region redistribution can influence flood risk, water quality, and wildlife.

The surface of Louisiana is underlain by geologically young sedimentary sequences that were deposited in or adjacent to rivers and deltas in a coastal-plain setting. These deposits indicate that a major river system corresponding to the Mississippi River has persisted at least since the Gulf of Mexico began to form and, in general, the entire suite of fluvial, deltaic, and coastal deposits has advanced farther into the Gulf through time, and continues now to fill it with sediment. The processes that created the fluvial and deltaic sedimentary sequences that comprise the majority of the surface strata in Louisiana persist to the present time.

Most surface exposures in Louisiana consist of Quaternary (Pleistocene and Holocene) sediment. Holocene deposits, including alluvium of the Mississippi, Red, and Ouachita, and other rivers and smaller tributaries, and coastal marsh deposits, occupy about 55% of the surface, including the area of the proposed action. The alluvium consists of sandy and gravelly channel deposits mantled by sandy to muddy channel deposits, with organic-rich muddy backswamp deposits in between.

Natural ground in the area varies in elevation from 10 feet along the alluvial banks of the Mississippi River in the northern portion of the parish, to several feet below sea level in the lower portions of some pumped areas. Vegetation varies from urban and agricultural varieties along the alluvial banks and levee protected areas to heavily wooded swamp and open marsh classes covering the largest portions of the area within the parish.

Within areas of the proposed FJFS in Plaquemines Parish, the soil components present include the following:

- Westwego clay – a mix of clayey and organic matter artificially drained and kept dry by levee protection and pumping. It is poorly drained with very slow permeability, having formed from artificially drained brackish material. A typical profile of Westwego clay in comprised of clay from 0 – 36 inches, muck from 31 – 49 inches, and clay from 49 – 62 inches (U.S. Department of Agriculture, USDA Web Soil Survey, 2013).

The Farmland Protection Policy Act (FPPA: P.L. 97-98, Sec. 1539-1549; 7 U.S.C. 4201, *et. seq.*) was enacted in 1981 to minimize the unnecessary conversion of farmland to non-agricultural uses as a result of federal actions. Programs administered by federal agencies must be compatible with state and local farmland protection policies and programs. The Natural Resources Conservation Service (NRCS) is responsible for protecting significant agricultural lands from irreversible conversions that result in the loss of an essential food or environmental resource. Prime farmland is characterized as land with the best physical and chemical characteristics for the production of food, feed, forage, fiber, and oilseed crops (USDA, 1989). For the purpose of FPPA, farmland includes prime farmland, unique farmland, and land of statewide or local importance. Farmland subject to FPPA requirements does not have to be currently used for cropland. It can be forest land, pastureland, cropland, or other land, but not water or urban built-up land. The Westwego clay found at the proposed FJFS site is not classified as Prime Farmland (USDA Web Soil Survey, 2013).

The Clean Water Act (CWA) and associated federal regulations (Title 40 of the Code of Federal Regulations 123.25 (a)(9), 122.26(a), 122.26(b)(14)(x), and 122.26(b)(15)) require nearly all construction site operators engaged in clearing, grading, and excavating activities that disturb one acre or more, including smaller sites in a larger common plan of development or sale, to obtain coverage under a National Pollutant Discharge Elimination System (NPDES) permit for their stormwater discharges. Louisiana has been authorized by the U.S. Environmental Protection Agency (USEPA, 2007) to implement the federal requirements and have issued their own permits for stormwater discharges associated with construction activities (LDEQ, Louisiana Department of Environmental Quality, 2012). It is anticipated that the proposed project including the construction of the new FJFS will require a permit from the LDEQ. The provision of the federal grant to complete this proposed project will be conditioned to obtain necessary permits and remain in compliance with the permit requirements.

Alternative 1 - No Action

Implementation of the no action alternative would not impact the soils or geologic processes known for the area. The no action alternative would not result in conversion of prime farmland to non-agricultural uses.

Alternative 2 – Reconstruct Improved Facilities at an Alternate Location (Proposed Action)

Construction of the new FJFS facility within the identified area would not adversely impact or cause significant adverse disturbance of geology or soil as part of the FJFS reconstruction. The project will also not result in conversion to non-agricultural uses of any prime, or state-wide and locally important farmlands. Project activities will be required by LDEQ to observe precautions

to control nonpoint source pollution from construction activities and further will be required to obtain permits and implement the required conditions.

Alternative 3 – Reconstruct at Original Site

Reconstruction of the FJFS facility at the original location would not adversely impact or cause significant adverse disturbance of geology or soil. The project will also not result in conversion to non-agricultural uses of any prime, or state-wide and locally important farmlands. Project activities will be required by the Louisiana Department of Environmental Quality (LDEQ) to observe precautions to control nonpoint source pollution from construction activities and further will be required to obtain permits and implement the required conditions.

4.3 Air Quality

The Clean Air Act (CAA) requires the state of Louisiana to adopt ambient air quality standards to protect the public from potentially harmful amounts of pollutants. Six common air pollutants (also known as "criteria pollutants") are regulated by USEPA and the states under the CAA. They are particle pollution (often referred to as particulate matter), ground-level ozone, carbon monoxide, sulfur oxides, nitrogen oxides, and lead. The Louisiana Department of Environmental Quality has designated areas meeting the state's ambient air quality standards by their monitoring and modeling program efforts, (i.e., attainment areas). Louisiana has no carbon monoxide, nitrogen oxides, sulfur oxides, particulate or lead nonattainment areas. According to results from the state's air quality monitoring, Plaquemines Parish has been identified as an attainment area for criteria pollutants (LDEQ, 2011).

Alternative 1 – No Action

Implementation of the no action alternative would not adversely impact ambient air quality for the area.

Alternative 2 – Reconstruct Improved Facilities at an Alternate Location (Proposed Action)

A temporary degradation of air quality may occur from vehicle exhaust emissions and increased dust during construction of the FJFS at the Plaquemines Parish Government Center. In order to reduce emissions during construction activities, site soils associated with staging areas and roads shall be covered with rock and/or wetted to minimize dust. The proposed action would not significantly affect the ambient air quality by following these best management practices for reducing the amount of particulate matter (dust & vehicle emissions) from construction work occurring on the site and by obtaining permits for operations and waste management activities and complying with the permit conditions.

Alternative 3 – Reconstruct at Original Site

Construction would occur within the original footprint, which represents an area that has already been disturbed, graded, and developed and negligible impact is anticipated. A temporary degradation of air quality may occur from vehicle exhaust emissions and increased dust during

construction of the FJFS at the original site. In order to reduce emissions during construction activities, site soils associated with staging areas and roads shall be covered with rock and/or wetted to minimize dust. This alternative would not significantly affect the ambient air quality by following these best management practices for reducing the amount of particulate matter (dust & vehicle emissions) from construction work occurring on the site and by obtaining permits for operations and waste management activities and complying with the permit conditions.

4.4 Water Resources and Water Quality

4.4.1 Surface Water, Ground Water, Potable Water

Surface Water



Surface water in the vicinity of the proposed FJFS site drains through well-defined ditches and swales to interior levee canals that are pumped into the Barataria Basin. The Barataria Basin is located immediately south and west of New Orleans, Louisiana. The basin is bounded on the north and east by the Mississippi River from Donaldsonville to Venice, on the south by the Gulf of Mexico, and on the west by Bayou Lafourche. The basin contains approximately 1,565,000 acres. The Barataria Basin is an irregularly shaped area bounded on each side by a distributary ridge formed by the present and a former channel of the Mississippi River. A chain of barrier islands separates the basin from the Gulf of Mexico. In the northern half of the basin, which is segregated by the Gulf Intracoastal Waterway, several large lakes occupy the sump position approximately half-way between the ridges. The southern half of the basin consists of tidally influenced marshes connected to a large bay system behind the barrier islands. The basin contains 152,120 acres of swamp, 173,320 acres of fresh marsh, 59,490 acres of intermediate marsh, 102,720 acres of brackish marsh, and 133,600 acres of saline marsh (CWPPRA, 2013).

Ground Water

The coastal lowlands aquifer system in Louisiana consists of a gulf-ward-thickening, heterogeneous, unconsolidated to poorly consolidated wedge of discontinuous beds of sand, silt, and clay that range in age from Oligocene to Holocene. The aquifer system underlies parts of the East and West Gulf Coastal Plain and the Mississippi Alluvial Plain Sections of the Coastal Plain Physiographic Province. The coastal lowlands aquifer system extends eastward from Texas across southern and central Louisiana into southern Mississippi (Figure 14). The coastal lowlands aquifer system yields large quantities of water for agricultural, public supply, domestic and commercial, and industrial uses (U.S. Geological Survey [USGS] Groundwater Atlas of the U. S., 1998).

In the southeastern part of Louisiana many of the aquifers have been named according to the depth at which they are usually encountered in the industrial districts of Baton Rouge and New Orleans, where groundwater pumpage is substantial (for example, the "1,200-foot" sand). Because of the regional southward dip of the aquifers and because they are cut and displaced by faults, the "1,200-foot" sand in New Orleans is not the same permeable unit as the "1,200-foot"

sand in Baton Rouge. In this case, the same name has been applied locally to water-yielding strata that are neither stratigraphically equivalent nor hydraulically interconnected (USGS, 1998).

Moderate to large quantities of fresh water is available to depths of 200 to 450 feet in most of Plaquemines Parish. Water levels in wells range from artesian to approximately 20 feet below the land surface in most of the parish. Pumping in the parish has had no significant effect on water levels. Several wells in the parish yield 2,000 to 3,000 gallons per minute, and higher yields are possible. The chloride content of water from wells near the Mississippi River ranges from 2 to 5 parts per million. Chloride content generally increases with distance from the Mississippi River. Water from very deep wells is generally soft and with low iron content (USGS, 1998).

Potable Water Supply

The Plaquemines Parish water system provides potable water to the entire parish by treatment of raw water from the Mississippi River. For periods of salt water intrusion, raw water reservoirs are maintained at three locations in the parish, Boothville, Pointe a la Hache, and Davant.

Alternative 1 – No Action

Implementation of the no action alternative would not adversely impact the surface or ground water resources of the region.

Alternative 2 – Reconstruct Improved Facilities at an Alternate Location (Proposed Action)

Construction of the FJFS as planned in accordance with project conditions and mitigation measures will not adversely impact surface water, ground water, or potable water supplies. To minimize spills and leaks of hazardous materials from the maintenance of construction equipment, safe handling procedures per local, state, and federal regulations must be used to reduce impacts to surface and ground water resources. Sound building techniques and the use of best management practices would mitigate minor potential effects that might otherwise result from runoff infiltration to ground water during construction.

Alternative 3 – Reconstruct at Original Site

Reconstruction of the FJFS at the original site in accordance with project conditions and mitigation measures will not adversely impact surface water, ground water, or potable water supplies. To minimize spills and leaks of hazardous materials from the maintenance of construction equipment, safe handling procedures per local, state, and federal regulations must be used to reduce impacts to surface and ground water resources. Sound building techniques and the use of best management practices would mitigate minor potential effects that might otherwise result from runoff infiltration to ground water during construction.

4.4.2 Wetlands and Waters of the United States

The United States Army Corps of Engineers (USACE) regulates the discharge of dredged or fill materials into Waters of the U.S. including wetlands, pursuant to Section 404 of the CWA. Jurisdictional wetlands are defined as those areas that are inundated or saturated by surface or ground water 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. Jurisdictional wetland determinations are regulated by the USACE pursuant to the CWA. Executive Order 11990, Protection of Wetlands, also directs federal agencies to take actions to minimize the destruction, loss, or degradation of wetlands.

The heavily developed areas of Plaquemines Parish are surrounded by levees on all sides, which are surrounded by fresh, intermediate and salt marsh wetlands. These wetlands are the natural spawning grounds and nurseries for much of the nation's desirable seafood. These wetlands also provide natural flood control, hurricane defense, and water filtration (Plaquemines Parish Master Plan, 2011). This area contains a variety of habitats including forested wetlands, fresh, intermediate, brackish and saline marshes that follow the salinity gradient from the Mississippi River to the fragmented salt marshes close to Breton Sound. Historically, these wetlands have received Mississippi River flood water and there has existed a dynamic relationship between the fresh river water and the saline water from Breton Sound.

Review of United States Fish & Wildlife Service (USFWS) National Wetlands Inventory (NWI, Figure 9) data indicates no mapped wetlands units in the direct project area. Waters of the United States, an area of the Intracoastal Waterway, lie approximately ½ mile to the northwest. An area of forest to the north and sections of the English Turn Subdivision have been classified in the NWI as Palustrine Forest Broad-Leaved Deciduous Temporarily Flooded Partially Drained/Ditched (PFO1Adh). This wetlands type consists of non-tidal wetlands dominated by trees, shrubs, emergents, mosses, or lichens and all such wetlands that occur in tidal areas where salinity due to ocean derived salts is below 0.5 parts per thousand (Cowardin, 1979). The trees of this wetland type are characterized by woody vegetation that is 6 meters tall or taller. Surface water is present for brief periods during the growing season, but the water table usually lies well below the soil surface for most of the growing season. A particular characteristic of this wetland regime is that it has been partially drained and hydrologically altered but soil moisture is sufficient to support some hydrophytes.

As part of the NEPA Solicitation of views, a wetlands jurisdictional determination was requested of the U.S. Army Corps of Engineers. Based upon a review of recent maps, aerial photography, and soils data, the Corps of Engineers determined that the proposed property for the relocation of the FJFS is not a wetland subject to Corps' jurisdiction and that no adverse impacts to Corps of Engineer projects are anticipated (U.S. Army Corps of Engineers, 2013). Furthermore, a U.S. Environmental Protection Agency preliminary review relative to *Guidelines for Specification of Disposal Sites for Dredged or Fill Material* (40 CFR Part 230) revealed that jurisdictional waters of the U.S. do not occur at the proposed site (USEPA, 2013).

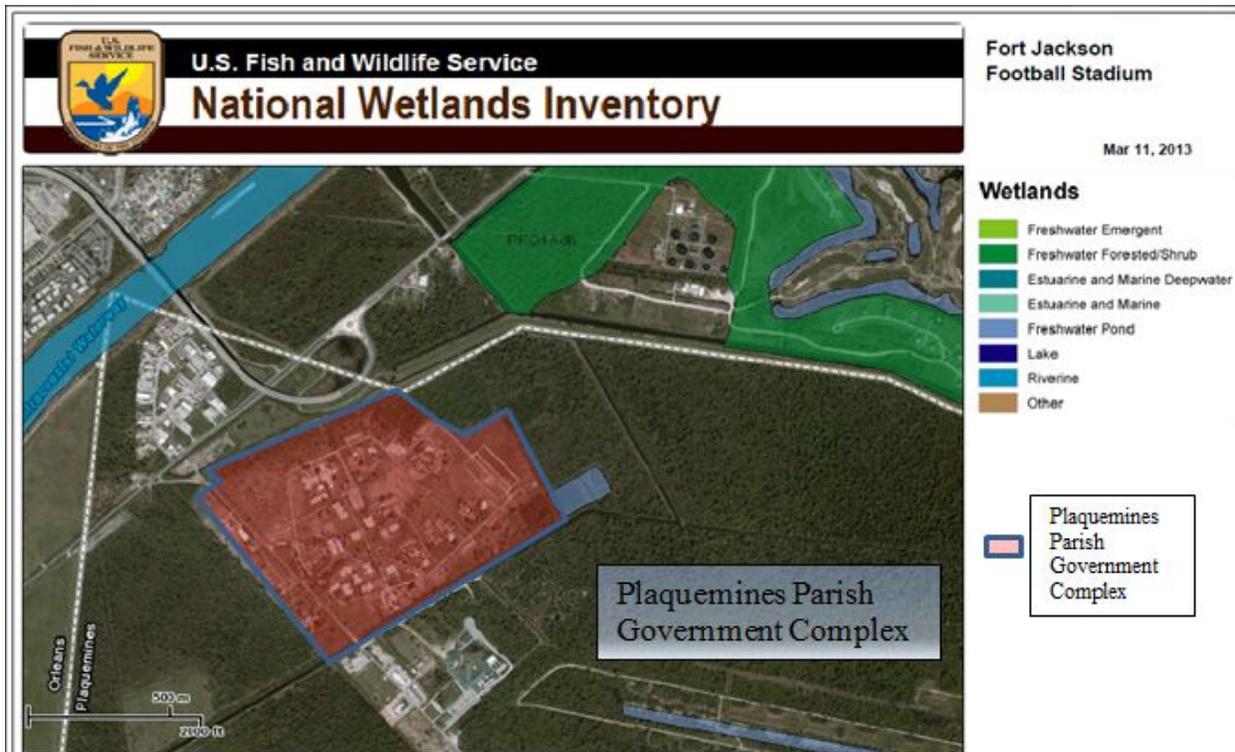


Figure 9 - U. S. Fish and Wildlife Service Mapped Wetland Units (USFWS, 2013)

Alternative 1 – No Action

Implementation of the no action alternative would not impact wetlands or other waters of the U.S. and would not require a CWA Section 404 permit.

Alternative 2 – Reconstruct Improved Facilities at an Alternate Location (Proposed Action)

Construction of the FJFS facility as proposed (including incorporating all mitigating conditions) would not adversely impact waters of the U.S. or adversely modify wetlands per review of USFWS NWI (USFWS NWI Mapper, 2013) and U. S. Army Corps of Engineers jurisdictional determination letter dated July 3, 2013 (Appendix E).

Alternative 3 – Reconstruct at Original Site

Reconstruction of the FJFS at the original site would not impact undeveloped lands. No jurisdictional wetlands have been identified at or significantly affected by the potential action at the original FJFS site. Therefore, reconstruction of the FJFS facility at the original location (including incorporating all mitigating conditions) would not adversely impact waters of the U.S. or adversely modify wetlands per review of USFWS NWI Mapper, 2013).

4.4.3 Floodplains

Executive Order (EO) 11988, Floodplain Management, requires federal agencies to avoid direct or indirect support of development and new construction within or affecting the 1% annual chance special flood hazard area (SFHA) (i.e., 100-year floodplain) whenever there is a practicable alternative (for “*Critical Actions*”, within or affecting the 0.2% annual chance SFHA, i.e., the 500-year floodplain). FEMA’s regulations for complying with EO 11988 are found in 44 CFR Part 9, Floodplain Management and Protection of Wetlands. In compliance with FEMA policy implementing EO 11988, the proposed project was reviewed for possible impacts associated with occupancy or modification to a floodplain. The Executive Order guidelines address an eight-step process that is carried out as part of the decision-making for projects that have potential impacts to or within the floodplain. The eight steps reflect the assessment process required in Section 2(a) of the Order. The 8-Step Decision Making Process Document completed for this project is attached herein as Appendix B.

In compliance with FEMA policy implementing EO 11988, the proposed project was reviewed for possible impacts associated with occupancy or modification of a floodplain. Plaquemines Parish enrolled in the National Flood Insurance Program (NFIP) on January 17, 1985. According to the NFIP Revised Preliminary Flood Insurance Rate Map panel number 22075C0039E (FEMA, 2012a), dated November 9, 2012 (Figure 10), the proposed project site lies within a special flood hazard area zone AE, the 1 percent annual chance floodplain base flood elevation (BFE) determined, elevation -2 feet above mean sea level North American Vertical Datum 1988 (i.e., the 100-year floodplain). Ground elevation at the proposed site is approximately 0 feet mean sea level (Google Earth, 2013).

The low-lying areas of Plaquemines Parish are subject to periodic flooding from a variety of sources. Flooding results from intense rainfall in the general area, abnormally high tides in the Gulf of Mexico, hurricanes or lesser tropical disturbances and/or combinations of the various events. In the northern portion of Plaquemines Parish, the predominant flooding source is rainfall runoff. Pumping facilities within protected areas are unable to discharge runoff from severe storms expeditiously. The problem is further aggravated by subsidence that usually occurs in pumped areas that were formerly wetlands (FEMA, 2012b).

The proposed project and alternatives were analyzed to determine whether they are practicable, i.e. capable of being done within existing constraints in light of overall project purposes. This test of practicability depends upon the situation and includes consideration of all pertinent factors, such as environment, cost, and technology. To determine the practicability, the proposed action and alternatives were assessed for impacts within or affecting the floodplain.

The no action alternative was determined to not be practicable as it did not meet the project purposes, i.e. to restore the lost functions of the damaged FJFS. The alternative to reconstruct the FJFS in its pre-storm location was determined to not be practicable due to the high risk of future damage from coastal flooding and hurricane storm damage. The proposed action, to rebuild the FJFS in Belle Chase, Louisiana in a location protected from flooding by levee and less prone to hurricane storm damage was determined to be a practicable alternative meeting the project purposes. This location has minimal flood risk and would be conditioned to incorporate

mitigation measures including compliance with relevant building codes and standards and applicable floodplain construction requirements meeting the minimum requirements of the NFIP found in 44 CFR Part 60.

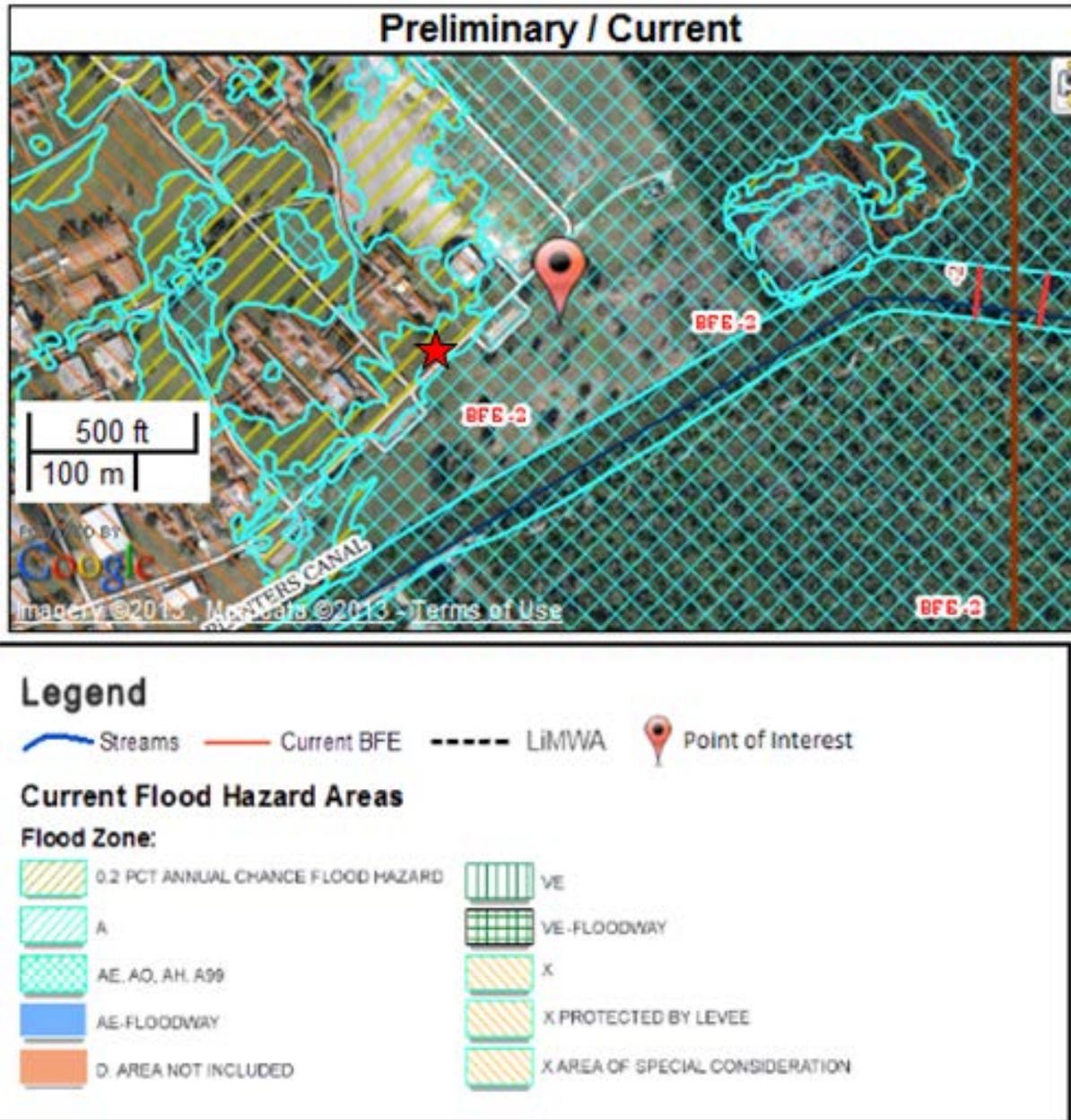


Figure 10 – Revised Preliminary Flood Insurance Rate Map Panel 22071C0038E (FEMA, 2012a)

Alternative 1 – No Action

The no action alternative would not result in impacts to the 1 percent annual chance base floodplain.

Alternative 2 – Reconstruct Improved Facilities at an Alternate Location (Proposed Action)

The proposed action alternative would involve the relocation and reconstruction of the functions of the damaged FJFS to the proposed site within a special flood hazard area. The ground surface at the proposed project site is at an approximate elevation between 0.776 and 2.0 feet above mean sea level (North American Vertical Datum 1988).

This EA forms part of the Eight Step Planning Process outlined in 44 CFR Part 9. No acceptable practicable alternatives outside of the special flood hazard area were identified by Plaquemines Parish or GOHSEP that meet the project objectives. Mitigation of potential adverse impacts, if any, must be accomplished by incorporation of mitigation and minimization measures including compliance with relevant codes and standards. These projects must be conducted in accordance with conditions for federal actions in the floodplain as set forth in EO 11988, Floodplain Management, and EO 11990, Protection of Wetlands, and the implementing regulation found at 44 CFR Part 9, Floodplain Management and Protection of Wetlands. These regulations apply to Agency actions which have the potential to affect floodplains or wetlands or their occupants, or which are subject to potential harm by location in floodplains or wetlands.

Additionally, FEMA Public Assistance grant funded projects carried out in the floodplain or affecting the floodplain must be coordinated with the relevant floodplain administrator for a floodplain development permit and the action must be undertaken in compliance with relevant, applicable, and required local codes and standards. This will reduce the risk of future flood loss, minimize the impacts of floods on safety, health, and welfare, and preserve and possibly restore beneficial floodplain values as required by Executive Order 11988. Based upon the above considerations, this alternative has been determined to be a practicable alternative meeting the objectives of the action.

Alternative 3 – Reconstruct at Original Site

Reconstruction of the FJFS at the original site would involve the restoring of the functions of the damaged FJFS within a special flood hazard area zone AE with a base flood elevation in excess of 13 feet NAVD88. Rebuilding the damaged facilities at this location would require costly floodplain management requirements including elevation of structures above the base flood elevation and the inclusion of mitigation and minimization measures that would ensure the facilities would be reasonably safe from wind and flood damage in the next storm. This alternative has been determined by the applicant to not be practicable due to the availability of a site with less exposure to wind and flood risk.

4.5 Coastal Resources

The Coastal Zone Management Act of 1972 (CZMA) requires federal agency actions to be consistent with the policies of the state Coastal Zone Management Program when conducting or supporting activities that affect a designated coastal zone. The Louisiana Department of Natural Resources (LDNR) regulates development in Louisiana's coastal zone through the Coastal Use Permit Program. The FJFS facility in northwest Plaquemines Parish is within the regulated Louisiana Coastal Zone and, therefore, is required to obtain a Coastal Use Permit and undergo a federal-state consistency review (Figure 11). An initial application for a Coastal Use Permit has been submitted by FEMA as part of the NEPA Solicitation of Views which has been determined by the Office of Coastal Management to be complete and review by the State for compliance with the Louisiana Coastal Zone Management Act has begun (State of Louisiana Office of Coastal Management, 2013). Additionally, it has been determined that the proposed activity is a use of state concern in accordance with Louisiana Revised Statute 49:214.5.

The Louisiana Office of Coastal Management requires a complete Coastal Use Permit Application from Plaquemines Parish to properly review and evaluate this project (Joint Application Form, locality maps, project illustration plats with plan and cross section views, etc.). A FEMA condition of project approval will be for Plaquemines Parish to submit the required application package and complete the permitting process. Additionally, the Parish is further required to apply to the local Plaquemines Parish Coastal Management Office and obtain any necessary permits prior to undertaking the project. Plaquemines Parish and its contractors must carry out, perform, and/or operate the use in accordance with any permit conditions, plans, and specifications approved by the LDNR and the local Coastal Management Office.

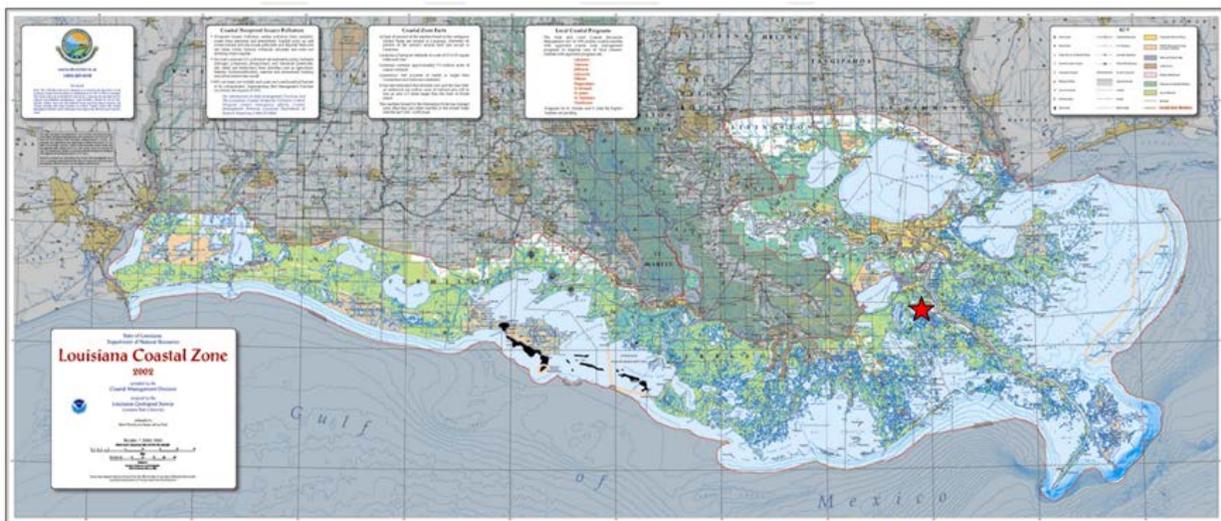


Figure 11 – Fort Jackson Football Stadium Proposed Location within the Highlighted Coastal Zone (LDNR, 2012)

The USFWS regulates federal funding in Coastal Barrier Resource System (CBRS) units under the Coastal Barrier Resources Act (CBRA). This Act protects undeveloped coastal barriers and related areas (i.e., Otherwise Protected Areas) by prohibiting direct or indirect federal funding of projects that support development in these areas. This promotes the appropriate use and

conservation of coastal barriers along the Gulf of Mexico. The proposed project site is not located within a regulated CBRS unit (Nearest units shown in Figure 12, see yellow bordered areas in photo inset below).

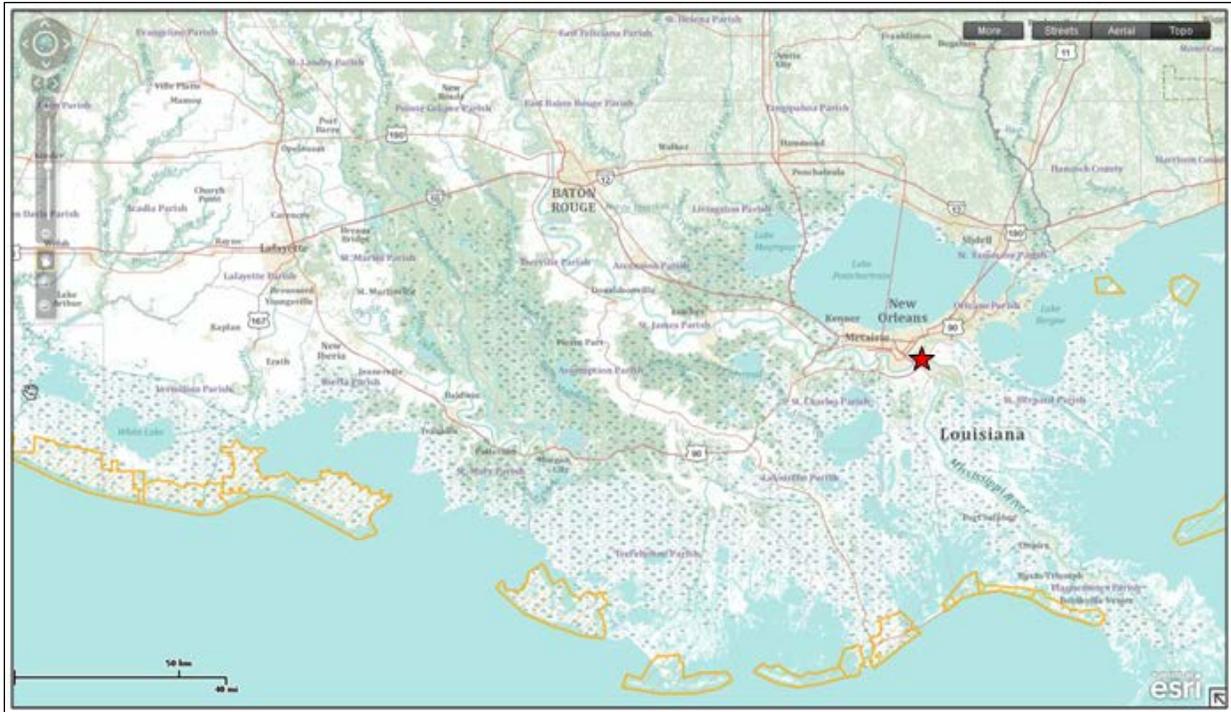


Figure 12 – Fort Jackson Football Stadium Proposed Location - Nearest Coastal Barrier Resource System Units (Shown Highlighted in Yellow)

Alternative 1 – No Action

Implementation of the no action alternative would not impact Coastal Barrier Resources or the Louisiana Coastal Zones.

Alternative 2 – Reconstruct Improved Facilities at an Alternate Location (Proposed Action)

Review of Louisiana’s Coastal Zone Boundary Map identified that the construction of the proposed action is within the coastal zone jurisdiction therefore, the project requires a Coastal Use Permit to ensure conformity with the Louisiana Coastal Management Plan to ensure enforcement of applicable construction standards in implementing the proposed action. A FEMA condition of project approval will be for Plaquemines Parish to submit the required application package and complete the permitting process prior to undertaking the project. In addition, the proposed action is not located in a regulated CBRS unit and will have no adverse effects on any CBRS unit.

Alternative 3 – Restore at Original Location

Review of Louisiana’s Coastal Zone Boundary Map identified that the reconstruction of the FJFS at the original location would be within the coastal zone jurisdiction therefore, the project would require a Coastal Use Permit to ensure conformity with the Louisiana Coastal Management Plan and enforcement of applicable construction standards in implementing the alternative action. A FEMA condition of project approval will be for Plaquemines Parish to submit the required application package and complete the permitting process prior to undertaking the project. In addition, the proposed action is not located in a regulated CBRS unit and will have no adverse effects on any CBRS unit.

4.6 Biological Resources

4.6.1 Threatened and Endangered Species and Critical Habitat

Under provisions of the Endangered Species Act, federal agencies shall use their authorities to carry out programs for the conservation of listed species, and shall ensure any action authorized, funded or implemented by the agency is not likely to: (1) adversely affect listed species or designated critical habitats; (2) jeopardize the continued existence of proposed species; or (3) adversely modify proposed critical habitat (16 USC 1536).

The Louisiana Natural Heritage Program has compiled data on rare, endangered, or otherwise significant plant and animal species, plant communities, and other natural features throughout the state of Louisiana. Heritage reports summarize the existing information known at the time of a request regarding a location in question. Personnel of the Habitat Section of the Coastal & Nongame Resources Division have reviewed the preliminary data for the proposed project. After careful review of the database, no impacts to rare, threatened, or endangered species or critical habitats are anticipated for the proposed project. No state or federal parks, wildlife refuges, scenic streams, or wildlife management areas are known at or in the vicinity of the specified site within Louisiana’s boundaries (LDWF, 2013).

Additionally, the USFWS has indicated that the project has been reviewed for effects to federal trust resources under their jurisdiction and currently protected by the Endangered Species Act of 1973 (Act). The project, as proposed on the current plans, is not likely to adversely affect those resources. This finding fulfills the requirements under Section 7(a)(2) of the Act.

The Magnuson-Stevens Fishery Conservation and Management Act (as amended), also known as the Sustainable Fisheries Act, requires federal agencies to consult with the National Oceanic and Atmospheric Administration National Marine Fisheries Service (NMFS) on activities or proposed activities authorized, funded, or undertaken by that agency that may adversely affect Essential Fish Habitat (EFH). The EFH provisions of the Sustainable Fisheries Act are designed to protect fisheries habitat from being lost due to disturbance and degradation. NMFS reviewed the proposed scope of work for impacts to regulated marine fisheries resources and essential habitat. The project has been found to be outside areas supportive of marine fisheries resources and areas categorized as EFH (NMFS, 2013).

4.6.2 Migratory Birds

The Migratory Bird Treaty Act (MBTA) makes it unlawful to take, possess, buy, sell, purchase, or barter any migratory bird listed in 50 CFR 10, including feathers or other parts, nests, eggs, or products, except as allowed by implementing regulations (50 CFR 21). Disturbance that causes nest abandonment and/or loss of reproductive effort (e.g., killing or abandoning eggs or young) may be considered a take and is potentially punishable by fines and/or imprisonment. If an action is determined to cause a potential take of migratory birds, as described above, then a consultation process with the USFWS needs to be initiated to determine measures to minimize or avoid these impacts. This consultation, when required, starts as an informal process.

4.6.3 Wildlife and Fish

The Louisiana Natural Heritage Program has compiled data on rare, endangered, or otherwise significant plant and animal species, plant communities, and other natural features throughout the State of Louisiana. Heritage reports summarize the existing information known at the time of a request regarding a location in question. Personnel of the Habitat Section of the Coastal & Nongame Resources Division have reviewed the preliminary data for the proposed project. After careful review of the database, no impacts to rare, threatened, or endangered species or critical habitats are anticipated for the proposed project. No state or federal parks, wildlife refuges, scenic streams, or wildlife management areas are known at or in the vicinity of the specified site (LDWF, 2013).

Alternative 1 – No Action

Implementation of the no action alternative would not adversely affect endangered, threatened, or proposed listed species as well as listed critical habitats.

Alternative 2 – Reconstruct Improved Facilities at an Alternate Location (Proposed Action)

Careful review of the proposed project by the Louisiana Department of Natural Resources and USFWS indicates the proposed plan has little potential for adverse effects and that the project is unlikely to adversely impact protected resources. Based upon the NMFS review of the proposed project and their knowledge of the effects of these types of projects, NMFS indicated that the project is not located in an area supportive of marine fishery species, or categorized as essential fish habitat. As such, further coordination with the NMFS is not necessary. The implementation of best management practices ensures that the temporary adverse effects of facility construction will be minimized.

Alternative 3 – Reconstruct at Original Site

Careful review of the original site of the FJFS confirmed that the site is previously developed and no evidence of the presence of threatened or endangered species or their habitat. The alternative to reconstruct at the original site has little potential for adverse effects and the project would be unlikely to adversely impact protected resources. A review of the proposed project and the potential effects indicate the project is not located in an area supportive of marine fishery

species, or categorized as essential fish habitat. The implementation of best management practices would ensure that the temporary adverse effects of facility reconstruction would be minimized.

4.7 Cultural Resources

The consideration of impacts to historic and cultural resources is mandated under Section 101(b)4 of the NEPA as implemented by 40 CFR Part 1501-1508. Section 106 of the National Historic Preservation Act (NHPA) requires Federal agencies to take into account their effects on historic properties (i.e. historic and cultural resources) and allow the Advisory Council on Historic Preservation an opportunity to comment. FEMA has chosen to address potential impacts to historic properties through the “Section 106 consultation process” of NHPA as implemented through 36 CFR Part 800.

In order to fulfill its Section 106 responsibilities, FEMA has initiated consultation on this project in accordance with the Statewide Programmatic Agreement (PA) dated August 17, 2009, and amended on July 22, 2011, between the Louisiana State Historic Preservation Officer (SHPO), the Louisiana Governor’s Office of Homeland Security and Emergency Preparedness, the Alabama-Coushatta Tribe of Texas, the Caddo Nation, the Chitimacha Tribe of Louisiana, the Choctaw Nation of Oklahoma, the Coushatta Tribe of Louisiana, the Jena Band of Choctaw Indians, the Mississippi Band of Choctaw Indians, the Quapaw Tribe of Oklahoma, the Seminole Nation of Oklahoma, the Seminole Tribe of Florida, the Tunica-Biloxi Tribe of Louisiana, and the Advisory Council on Historic Preservation (<http://www.fema.gov/new-orleans-metropolitan-area-infrastructure-projects-2#2>). The PA was created to streamline the Section 106 review process.

The “Section 106 process” outlined in the PA requires the identification of historic properties that may be affected by the proposed action or alternatives within the project’s area of potential effects (APE). Historic properties, defined in Section 101(a)(1)(A) of NHPA, include districts, sites (archaeological and religious/cultural), buildings, structures, and objects that are listed in or determined eligible for listing in the National Register of Historic Places (NRHP). Historic properties are identified by qualified agency representatives in consultation with interested parties. Below is a consideration of various alternatives and their effects on historic properties.

Alternative 1 – No Action

Alternative 1 does not include any FEMA undertaking; therefore FEMA has no further responsibilities under Section 106 of the NHPA.

Alternative 2 – Reconstruct New Facilities at an Alternate Location – (Proposed Action)

Based on research using the NRHP database, the Louisiana Cultural Resources Map on the Louisiana Division of Historic Preservation’s website, and agency files, FEMA has determined that the project area is not located within a listed National Register Historic District nor is it located within the view-shed of a property individually listed in the NRHP. The archaeological Area of Potential Effects (APE) includes all required staging and construction activities. The standing structures APE includes multiple structures which housed and were associated with the

Belle Chasse State School, none of which are over 50 years of age. In order to fulfill obligations under Section 106 of the NHPA, and in accordance with the PA, a cultural resources review was conducted in order to identify and evaluate potential historic properties if present within the APE that could be affected by the proposed construction activities. The standing structures evaluation and archaeological review were conducted by FEMA Historic Preservation Specialists and Archaeologists on May 23, 2011. None of the structures were found to be eligible for inclusion on the NRHP. Archaeological field investigations consisted of surface inspection and six soil probes. No cultural features, intact soils, intact cultural deposits, or discrete cultural components were identified during the field investigations. In accordance with Stipulation VIII.E of the PA, FEMA determined that there are No Historic Properties Affected as a result of the proposed undertaking and in a letter dated June 10, 2011, provided to SHPO and Tribes (Choctaw Nation of Oklahoma, Coushatta Tribe of Louisiana, Jena Band of Choctaw Indians, Mississippi Band of Choctaw Indians, Seminole Nation of Oklahoma and the Tunica-Biloxi Tribe of Texas) the opportunity to review and comment. SHPO concurrence with FEMA's determination was received in a letter dated June 16, 2011. The Jena Band of Choctaw Indians submitted written concurrence with the determination, dated June 22, 2011. The remaining Tribes did not object within the regulatory timeframes, therefore, in accordance with 36 CFR part 800.2(c)2, FEMA may proceed with funding the undertaking assuming concurrence. The applicant must comply with the Louisiana Unmarked Human Burial Sites Preservation Act (R.S. 8:671 et seq.) and the Inadvertent Discovery Clause, which can be found under the conditions section of this EA.

Alternative 3 –Reconstruct at Original Site

Based on research using the NRHP database, the Louisiana Cultural Resources Map on the Louisiana Division of Historic Preservation's website, and agency files, FEMA has determined that the project area is not located within a listed National Register Historic District, but is located within the view-shed of Fort Jackson, a National Historic Landmark. In accordance with Stipulation VII.A of the Statewide PA, FEMA determined that the scope of work meets the criteria in Appendix C: Programmatic Allowances, Item I, Section A, E, F, and I of the PA. FEMA shall document this determination in the project file and may authorize funding for the Undertaking without further Section 106 Review for it. The applicant must comply with the Louisiana Unmarked Human Burial Sites Preservation Act (R.S. 8:671 et seq.) and the Inadvertent Discovery Clause, which can be found under the conditions section of this EA.

4.8 Socioeconomic Concerns

4.8.1 Environmental Justice

According to the United States Census, there are 23,921 people, and 9,771 households residing in Plaquemines Parish (U.S. Census, 2010). The population density is 29.5 persons per square mile. The racial makeup of the parish is 71.3% White, 21.3% African American, and 5.3% of the population is Hispanic.

The median household income in Plaquemines Parish is \$55,301. The per capita income for the parish is \$25,015. Approximately 9.4% of the population is below the poverty line.

Executive Order 12898, Federal Actions to Address Environmental Justice in Minority and Low-Income Populations, mandates that federal agencies identify and address, as appropriate, disproportionately high and adverse human health or environmental effects of programs on minority and low-income populations. FEMA determines impacts to low-income and minority communities as part of the NEPA compliance process. A review of USEPA Environmental Justice Assessment Mapper identifies that the population of Plaquemines Parish is diverse in its ethnic composition and that the average household income is around \$10,000 higher than the state average (USEPA Environmental Justice Geographic Mapper 2012).

Construction of the new FJFS in Belle Chase will benefit all parish residents regardless of age, race, or income level. No changes are anticipated to the number of residents served by this parish-wide facility. While there may be minor, disproportionate adverse impacts on nearby workers and residents due to the construction of the FJFS, particularly due to increased air emissions from heavy construction equipment, these impacts would only be temporary during the construction of the project.

Alternative 1 – No Action

Implementation of the no action alternative would eliminate the accessibility to readily available football fields and sporting event services for Plaquemines Parish and the surrounding community.

Alternative 2 – Reconstruct New Facilities at an Alternate Location – (Proposed Action)

The proposed action would not create disproportionately high and adverse public health or environmental effects on minority and low-income populations. The new football stadium and its related facilities would provide accessibility to a quality sport facility for Plaquemines Parish and the surrounding community. Furthermore, the proposed project provides services that are available to all without regard to gender, race, creed, or ethnicity.

Alternative 3 –Reconstruct at Original Site

Reconstructing the FJFS at the original site would not have disproportionately high and adverse public health or environmental effects on minority and low-income populations. The FJFS

serves an important function for Plaquemines Parish. Rebuilding the FJFS would provide accessibility to a quality sporting facility for Plaquemines Parish and the surrounding community. Furthermore, this alternative provides services that are available to all without regard to gender, race, creed, or ethnicity.

4.8.2 Noise

Noise is generally described as unwanted sound and is federally regulated by the Noise Control Act of 1972 (NCA). Sound is usually measured in decibels (dB) on the A-weighted scale (scale most similar to range of sounds that the human ear can hear). The Day-Night Average Sound Level is the noise level averaged over a twenty-four (24) hour period with a 10-dB penalty for any sound occurring between 10 p.m. and 7 a.m. to account for the disproportionate effect noise has during these hours. EPA guidelines, and those of many other federal agencies, state that outdoor sound levels in excess of 55-dB Day-Night Average Sound Level are “normally unacceptable” for noise-sensitive receptors, such as libraries, schools or hospitals.

The FJFS is classified as a noise-sensitive receptor, serving a population considered particularly vulnerable to the adverse effects of noise pollution (i.e. children). The area immediately surrounding the proposed project site contains the Plaquemines Parish Government Complex and sparse residential development, including the English Turn Subdivision located approximately ½ to 1 mile toward the northeast. It is anticipated that events to be held at the new FJFS will include recreational and civic activities including football games and festivals. Events of this type typically generate significant noise, often with occasional peak levels that may adversely affect some receptors including children, workers at the Plaquemines Parish Government Center, and residents of the nearby scattered homes and the English Turn Subdivision. Furthermore, ephemeral noise increases can be anticipated from operation of heavy equipment during construction and from increased truck traffic delivering construction equipment, supplies, and building materials.

Alternative 1 – No Action

Under the No Action Alternative there would be no net increase of noise.

Alternative 2 – Reconstruct New Facilities at an Alternate Location – (Proposed Action)

Implementation of the proposed action will have a noise related impact on the surrounding community. Existing ambient noise levels in the site area are consistent with traffic noise from light commercial related businesses and government centers present on either side of F. Edward Hebert Blvd. There are nearby traffic lights located along this road that could cause traffic backups that may lead to an increase in noise levels because of idling and accelerating vehicles. Noise levels would most likely be associated with heavy equipment usage and the construction process. The construction process and building hours will be dictated by the Noise Control Act and Plaquemines Parish Noise Ordinances. In addition, after the stadium is built, there will likely be noise associated with crowds that attend sport games and festivals. The area immediately surrounding the proposed project site contains the Plaquemines Parish Government Complex and sparse residential development, including the English Turn Subdivision located

approximately ½ to 1 mile toward the northeast. These residents might occasionally experience a slight increase in the ambient noise level.

Alternative 3 –Reconstruct at Original Site

Implementation of Alternative 3 will have a noise related impact on the surrounding community. Existing ambient noise levels in the site area are consistent with traffic noise from light commercial related businesses present on Highway 23. There are no nearby traffic lights located along this road that could cause traffic backups that may lead to an increase in noise levels because of idling and accelerating vehicles. Noise levels would most likely be associated with heavy equipment usage and the construction process. The construction process and building hours will be dictated by the Noise Control Act and Plaquemines Parish Noise Ordinances. Under Alternative 3, the football stadium will be rebuilt in its original location and will likely produce the same amount of stadium-related noise as previously existed before the storm. There are no high density residential or commercial areas within a mile of the former football stadium site and is therefore unlikely to have a negative noise related impact on persons residing in close proximity.

4.8.3 Traffic

The project for the FJFS at the Plaquemines Parish Government Complex is accessed via F. Edward Hebert Boulevard. Traffic to and from the Complex can access F. Edward Hebert Boulevard from the intersection of either LA 406, Woodland Highway, on the west or from LA 996, Main Street, on the east. F. Edward Hebert Boulevard recently completed an end to end reconstruction to support the implementation of the Master Plan for redevelopment of the Plaquemines Parish Government Complex. The reconstruction included excavation and grading of the road bed and ditches and installation of a two-lane asphalt road. Toward the west, Woodland Highway and Main Street connect to LA 23, a north-south oriented Louisiana highway that serves Plaquemines and Jefferson parishes and spans 74 miles, connecting the cities of Gretna and Venice. Between Belle Chase and Venice, this serves as the main road along the west bank of the Mississippi River.

Alternative 1 – No Action

Implementation of the no action alternative would not cause adverse effects from Environmental Justice, Traffic, or Noise concerns.

Alternative 2 – Reconstruct Improved Facilities at an Alternate Location (Proposed Action)

Careful review of the proposed project indicates the proposed plan has little potential for permanent adverse effects and that the project is unlikely to result in adverse impacts to Environmental Justice, Noise, or Traffic. The implementation of best management practices would ensure that the temporary adverse effects from noise and air emissions during facility construction will be minimized.

Alternative 3 – Reconstruct at Original Site

Careful review of the alternative to reconstruct at the original site indicates the alternative has little potential for permanent adverse effects and that the project is unlikely to result in adverse impact to environmental Justice, Noise, or Traffic. The implementation of best management practices would ensure that the temporary adverse effects from noise and air emissions during facility construction will be minimized.

4.9 Hazardous Materials and Wastes

Hazardous wastes, as defined by the Resource Conservation and Recovery Act, are defined as “a solid waste, or combination of solid wastes, which because of its quantity, concentration, or physical, chemical, or infectious characteristics may:

- 1) Cause, or significantly contribute to an increase in mortality or an increase in serious irreversible or incapacitating reversible illness, or
- 2) Pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of or otherwise managed.”

A review of data sources (e.g., USEPA EnviroMapper, NEPAAssist, and the Louisiana Electronic Document Management System™) revealed that the proposed project site is not on federal and/or state agency’s lists concerning Voluntary Remediation Program, Brownfield Program, underground storage tank decommission, waste/debris disposal facilities, and oil/gas wells sites. According to historical aerial photographs from 1989 to 2012 and the topographic maps dated May 1939 and July, 2012, there were no obvious structures on the proposed site and no obvious sites of concern detected in the vicinity of proposed project area.

The Plaquemines Parish Government Complex and the proposed location of the FJFS has no record or indication of past or present hazardous waste activities including notification as a hazardous waste generator or other regulated activity. The U.S. Environmental Protection Agency reviewed the site and proposed action and performed a database search for records associated with the site and provided comment on the proposed action (Appendix E). No adverse records were identified and comments were incorporated into the EA analysis and documentation (USEPA, 2013).

Alternative 1 – No Action

Implementation of the no action alternative would not disturb any hazardous materials or create potential hazards to human health.

Alternative 2 – Reconstruct Improved Facilities at an Alternate Location (Proposed Action)

Construction of the FJFS at the proposed site would not disturb any hazardous materials or create increased potential hazards to human health. The proposed site is not adjacent to hazardous or solid waste facilities. If hazardous materials are unexpectedly encountered in the project area during the construction activities, appropriate measures for the proper assessment, remediation,

management and disposal of the contamination must be initiated in accordance with applicable federal, state, and local regulations. The contractor is required to take appropriate actions to prevent, minimize, and control the spill of hazardous materials at the proposed site.

Alternative 3 –Reconstruct at Original Sites

Construction of the FJFS at the original site would not disturb any hazardous materials or create increased potential hazards to human health. The proposed site is not adjacent to hazardous or solid waste facilities. If hazardous materials are unexpectedly encountered in the project area during the construction activities, appropriate measures for the proper assessment, remediation, management and disposal of the contamination must be initiated in accordance with applicable federal, state, and local regulations. The contractor is required to take appropriate actions to prevent, minimize, and control the spill of hazardous materials at the proposed site.

5.0 CUMULATIVE IMPACTS

The Council on Environmental Quality's (CEQ) regulations state that cumulative impacts represent 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." Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time (40 C.F.R. § 1508.7).

In its comprehensive guidance on cumulative impacts analysis under NEPA, the CEQ notes that: "[t]he range of actions that must be considered includes not only the project proposal, but all connected and similar actions that could contribute to cumulative effects" (CEQ, 1997). The term "similar actions" may be defined as "reasonably foreseeable or proposed agency actions [with] similarities that provide a basis for evaluating the environmental consequences together, such as common timing or geography." 40 C.F.R. § 1508.25(a)(3).

Not all potential issues identified during cumulative effects scoping need be included in an EA. Because some effects may be irrelevant or inconsequential to decisions about the proposed action and alternatives, the focus of the cumulative effects analysis should be narrowed to important issues of national, regional, or local significance. To assist agencies in this narrowing process, CEQ lists seven (7) basic questions, including: (1) is the proposed action one of several similar past, present, or future actions in the same geographic area; (2) do other activities (governmental or private) in the region have environmental effects similar to those of the proposed action; (3) have any recent or ongoing NEPA analyses of similar actions or nearby actions identified important adverse or beneficial cumulative effect issues; and, (4) has the impact been historically significant, such that the importance of the resource is defined by past loss, past gain, or investments to restore resources (CEQ, 1997, Table 2-1).

It is normally insufficient when conducting a cumulative effects analysis to merely analyze effects within the immediate area of the proposed action. Geographic boundaries should be expanded for cumulative effects analysis, and conducted on the scale of human communities, landscapes, watersheds, or airsheds. Temporal frames should be extended to encompass additional effects on the resources, ecosystems, and human communities of concern. A useful concept in determining appropriate geographic boundaries for a cumulative effects analysis is the project impact zone; *i.e.*, the area (and resources within that area) that could be affected by the proposed action. The area appropriate for analysis of cumulative effects will, in most instances, be a larger geographic area occupied by resources outside of the project impact zone.

The proposed project site at the Plaquemines Parish Government Center in Belle Chase, LA, is within the 70458 zip code geographic area. FEMA has determined that the area within a .5 mile radius of the site constitutes an appropriate project impact zone, and the larger geographic area consisting of the 70458 zip code constitutes an appropriate boundary, for a cumulative impact analysis of the proposed action and alternatives.

In accordance with NEPA, and to the extent reasonable and practicable, this draft EA considered the combined effects of the Proposed Action Alternative and other actions undertaken by FEMA

and other public and private entities that affect environmental resources the proposed action would affect, and occur within the considered geographic area and temporal frame(s).

Specifically, a range of past, present and reasonably foreseeable actions undertaken by FEMA within the designated geographic boundary area were reviewed: (1) for similarities such as scope of work, common timing and geography; (2) to determine environmental effects similar to those of the proposed action, if any; and (3) to identify the potential for cumulative impacts. As part of the cumulative effects analysis, FEMA also reviewed past, present and reasonably foreseeable projects of federal resource agencies and other parties within the designated geographic boundary. These reviews were performed in order to assess the proposed actions and effects of completed and ongoing actions, and to determine whether the incremental impact of the instant proposed action, when combined with the effects of other past, present, and reasonably foreseeable future projects, are cumulatively considerable or significant.

From August 2005 continuing to August 2013, approximately 163 FEMA PA program funded, and numerous non-FEMA funded, debris removal, protective measures, and repair projects have occurred, are occurring, or are reasonably foreseen to occur within the 70458 geographic area, to buildings, roads and bridges, recreational and educational facilities, public utilities, waterways, levees, and more (*Figure 13*). All FEMA funded actions are subjected to various levels of environmental review as a requirement for the receipt of federal funding. An applicant's failure to comply with any required environmental permitting or other condition is a serious violation which can result in the loss of federal assistance, including funding.

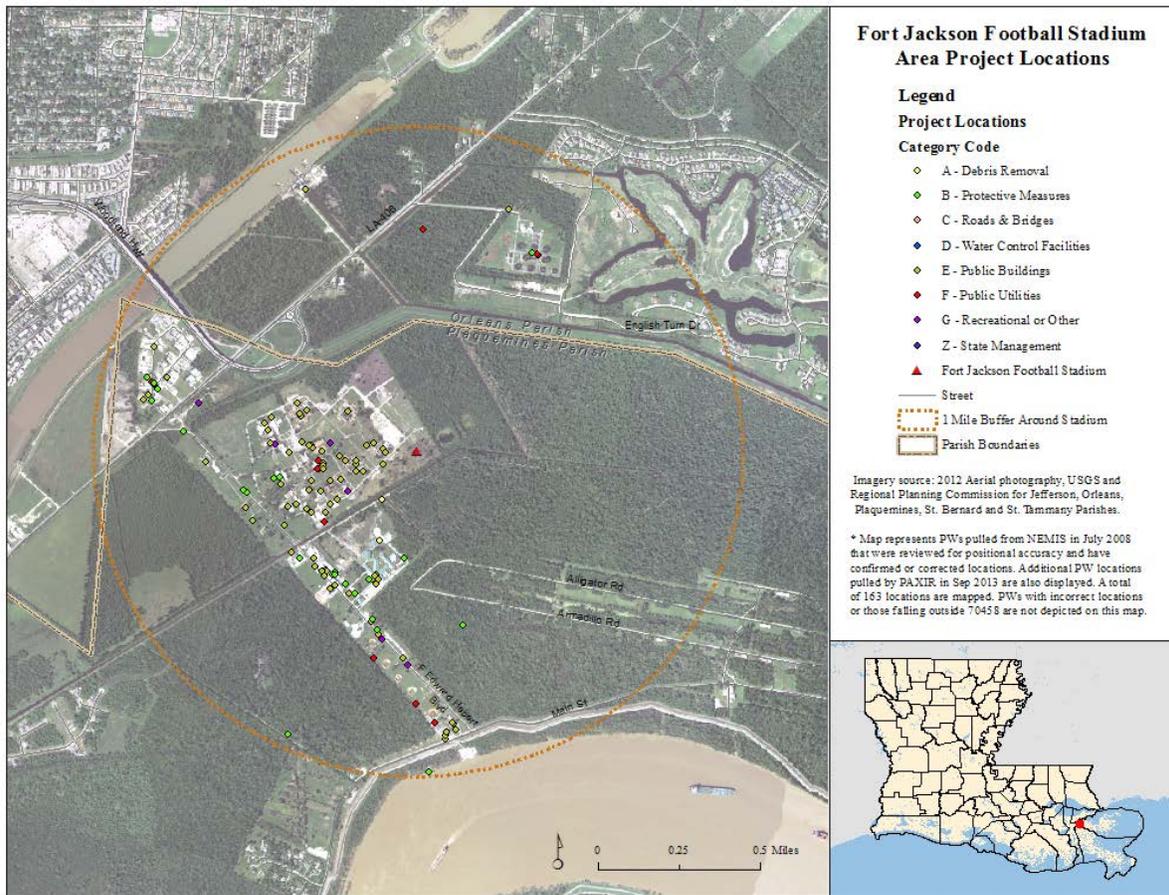


Figure 13 – FEMA-Funded Projects Occurring within the 70458 Zip Code

Table 3 below lists and briefly describes present, past, and reasonably foreseeable infrastructure and recovery improvement projects in the 70458 geographic area that are known to FEMA that may have the potential for cumulative impacts when combined with the effects of the present proposed action. Table 3 also identifies the potential for cumulative impacts, and the rationale for that assessment.

Project Name / Status	Lead Agency	Location	Description	Cumulative Impacts	Rationale
WBV-14.g.2 (Estelle Pump Station Vicinity Floodwalls)	USACE	Estelle Pump Station Vicinity	Improvements to Floodwalls for 1% Annual Chance Flood Protection	No Impacts	Completed 2009. Affected resources are significantly different from those in proposed action and alternatives, and overall expected to be beneficial to resources.

Project Name / Status	Lead Agency	Location	Description	Cumulative Impacts	Rationale
WBV-01 (Sector Gate at Boomtown Floodwall)	USACE	Sector Gate at Boomtown Floodwall	Construction of Gate at Boomtown Floodwall	No Impacts	Contract awarded 2008. The expected impacts to resources would be significantly different from those expected to be affected by the proposed action and alternative, and overall expected to be beneficial to resources. Effects to similar resources would be minimal and temporary.
WBV-2.a (Boomtown Floodwall)	USACE	Bone Mile Southwest of the Proposed Project at Belle Chase Highway Crossing Intracoastal Waterway	Improvements to Floodwalls for 1% Annual Chance Flood Protection	No Impacts	Completed 2009. Affected resources are significantly different from those in proposed action and alternatives, and overall expected to be beneficial to resources.
WBV-47.1 (Algiers Lock to Belle Chase Highway West Phase I)	USACE	One Quarter Mile West of Proposed Project between General De Gaulle Blvd. and Belle Chase Highway	Improvements to Existing Levee for Intracoastal Waterway for 1% Annual Chance Flood Protection	No Impacts	Contract awarded 2010. The expected impacts to resources would be significantly different from those expected to be affected by the proposed action and alternative, and overall expected to be beneficial to resources. Effects to similar resources would be minimal and temporary.

Table 1 – Projects with Potential for Cumulative Impacts

FEMA has determined that the incremental effects of the other infrastructure recovery and improvement actions are likely to be similar to the impacts and effects described in this EA for the present proposed action, in that the effects to socioeconomic resources are expected to be beneficial, and effects to other resources expected to be either non-existent, or minimal and temporary. FEMA has further determined that the incremental impact of the present proposed project, when combined with the effects of other past, present, and reasonably foreseeable future projects, are neither cumulatively considerable nor significant.

These infrastructure actions, some of which have already occurred, and many of which will occur concurrent with and or subsequent to the proposed action, are necessary as a result of the unprecedented devastation caused by the 2005 hurricanes, in order to restore pre-disaster conditions. In reviewing impacts, socioeconomic resources were identified as having the most potential to experience cumulative effects. Although devastating, the 2005 storms created an opportunity for the Applicant to serve residents in the Desire area and surrounding neighborhoods by opening a neighborhood clinic for dental, medical, and other wellness

Fort Jackson Football Stadium

Draft – Environmental Assessment (October 2013)

services, thereby filling a void for available healthcare services. Considered in relation to past, present, and reasonably foreseeable future actions, the cumulative impact of the proposed action to the built and natural environment would be minimal, would be beneficial rather than detrimental, and is not expected to contribute to any adverse effects or to otherwise significantly affect the human environment.

6.0 CONDITIONS AND MITIGATION MEASURES

FEMA funding will be contingent upon following all laws relating and including, but not limited to, the federal acts described in this EA, including the acquisition of any required federal permits and implementation of those permit requirements. In addition, all state and local laws will be adhered to in the planning and execution of the final project. Based upon the studies, reviews, and consultations undertaken in this EA, several conditions and mitigation measures must be taken by the applicant prior to and during proposed project implementation.

- The applicant must follow all applicable local, state, and federal laws, regulations, and requirements and obtain and comply with all required permits and approvals prior to initiating work.
- If during the course of work, archaeological artifacts (prehistoric or historic) or human remains are discovered, the applicant shall stop work in the vicinity of the discovery and take all reasonable measures to avoid or minimize harm to the finds. The applicant shall inform their Public Assistance (PA) contacts at FEMA, who will in turn contact FEMA Historic Preservation (HP) staff. The applicant will not proceed with work until FEMA HP completes consultation with the SHPO. In addition, if unmarked graves are present, compliance with the Louisiana Unmarked Human Burial Sites Preservation Act (R.S. 8:671 et seq.) is required. The applicant shall notify the law enforcement agency of the jurisdiction where the remains are located within twenty-four hours (24) of the discovery. The applicant shall also notify FEMA and the Louisiana Division of Archaeology at (225) 342-8170 within seventy-two (72) hours of the discovery. Failure to comply with these stipulations may jeopardize receipt of FEMA funding.
- To minimize air quality impacts, Plaquemines Parish and its contractors must implement BMPs to limit air emissions, fugitive dust and exhaust. BMPs would include maintaining and covering spoil piles, covering the loads of haul vehicles and keeping construction equipment properly tuned.
- Plaquemines Parish and its contractors must ensure project activities are conducted in a safe manner and in compliance with all state and federal occupational safety regulations, including OSHA, to protect workers and the general public.
- Project construction would involve the use of potentially hazardous materials (*e.g.*, petroleum products, cement, caustics, acids, solvents, paint, electronic components, pesticides, herbicides, fertilizers, treated timber) and may result in the generation of small volumes of hazardous wastes. Appropriate measures to prevent, minimize, and control spills of hazardous materials must be taken and generated hazardous and non-hazardous wastes are required to be disposed in accordance with applicable federal, state and local regulations.
- If required by LDEQ, the applicant shall require its contractor to prepare, certify, and implement a construction Storm Water Pollution Prevention Plan to prevent sediment and construction material transport from the sites (regulated under NPDES program, section

402). A Louisiana Pollution Discharge Elimination System (LPDES) permit will be required in accordance with the CWA and the Louisiana Clean Water Code. All coordination pertaining to these activities should be documented and copies forwarded to the state and FEMA as part of the permanent project files.

- If any solid or hazardous wastes, or soils and/or groundwater contaminated with hazardous constituents are encountered during the project, notification to LDEQ's Single-Point-of-Contact at (225) 219-3640 is required. Additionally, precautions should be taken to protect workers from these hazardous conditions.
- Louisiana Unmarked Human Burial Sites Preservation Act: If human bone or unmarked grave(s) are present within the project area, compliance with the Louisiana Unmarked Human Burial Sites Preservation Act (R.S. 8:671 et seq.) is required. The applicant shall notify the law enforcement agency of the jurisdiction where the remains are located within twenty-four hours of the discovery. The applicant shall also notify FEMA and the Louisiana Division of Archaeology at 225-342-8170 within seventy-two hours of the discovery.
- Inadvertent Discovery Clause: If during the course of work, archaeological artifacts (prehistoric or historic) are discovered, the applicant shall stop work in the vicinity of the discovery and take all reasonable measures to avoid or minimize harm to the finds. The applicant shall inform their Public Assistance (PA) contacts at FEMA, who will in turn contact FEMA Historic Preservation (HP) staff. The applicant will not proceed with work until FEMA HP completes consultation with the SHPO, and others as appropriate.

7.0 PUBLIC INVOLVEMENT AND AGENCY CONSULTATIONS

FEMA is the lead federal agency for conducting the NEPA compliance process for this Environmental Assessment and FEMA Public Assistance grant funded project. It is the responsibility of the lead agency to conduct the preparation and review of NEPA documents in a way that is responsive to the needs of the parish communities while meeting the spirit and intent of NEPA and complying with mandated provisions. As part of the development of early interagency coordination related to the proposed action, state and federal resource protection agencies were contacted and FEMA distributed an informal scoping notification through a Solicitation of Views.

These agencies include the Plaquemines Parish Coastal Management Office, the State Historical Preservation Officer, U. S. Fish and Wildlife Service, the U.S. Department of Agriculture Natural Resources Conservation Service, the Governor's Office of Homeland Security and Emergency Preparedness, Louisiana Department of Environmental Quality, U. S. Environmental Protection Agency, Louisiana Department of Natural Resources, U. S. Army Corps of Engineers, and National Oceanic & Atmospheric Administration National Marine Fisheries Service. FEMA has received no objections to the project as proposed subsequent to these notifications and comments and conditions received have been incorporated into this NEPA document.

In accordance with applicable local, state, and federal regulations, the applicant would be responsible for acquiring any necessary permits prior to commencing construction at the proposed project site. FEMA is inviting the public to comment on the proposed action during a fifteen (15) day comment period. A public notice will be published for one (1) days in the state newspaper, The Advocate, announcing the availability of this EA for review at the Plaquemines Parish Belle Chase Branch Library, Belle Chase, Louisiana, and at the FEMA Louisiana Recovery Office in New Orleans, LA. A copy of the Public Notice is attached in Appendix C.

8.0 LIST OF PREPARERS

John Darren Renne – Environmental Protection Specialist
NISTAC/URS – Contractor Support to FEMA
Louisiana Recovery Office

Megan F. Myers – Environmental Protection Specialist
Environmental Section – FEMA Louisiana Recovery Office

Leschina Holmes – Lead Environmental Protection Specialist
Environmental Section – FEMA Louisiana Recovery Office

Tiffany R. Spann-Winfield – Deputy Environmental Liaison Officer
Environmental Section – FEMA Louisiana Recovery Office

Annette Carroll – Historical Preservation Specialist
Historic Preservation Section – FEMA Louisiana Recovery Office

Richard Williamson – Historical Preservation Specialist
Historic Preservation Section – FEMA Louisiana Recovery Office

Jerame Cramer – Deputy Environmental Liaison Officer
Historic Preservation Section – FEMA Louisiana Recovery Office

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Appendix A
Site Photographs



**Photograph Plate 1 – Fort Jackson Football Stadium Proposed Location – Facing North
along Eastern Boundary**



**Photograph Plate 2 – Fort Jackson Football Stadium Site – Facing West across
Government Complex**

Appendix B
Floodplain and Wetland
8-Step Planning Documentation

**FLOODPLAIN 8-STEP PLANNING DOCUMENT
FACILITY PLANNING AND CONTROL
FORT JACKSON FOOTBALL STADIUM
PLAQUEMINES PARISH
ENVIRONMENTAL ASSESSMENT**

Date: 6/3/2013
Prepared by: John Renne, CFM, FEMA, Floodplain Specialist
Applicant: Louisiana Facility Planning and Control
Project Title: Fort Jackson Football Stadium
Request for: Improved Project - A/I Database #: 1977; FEMA-DR-LA: 1603
FIPS #: 000-UXL4N-00;
Latitude: 29.89682 **Longitude:** -89.97373

Background and Regulatory Setting

Hurricane Katrina, DR-1603, impacted Plaquemines Parish Louisiana and resulted in a presidentially declared major disaster. The Fort Jackson Football Stadium and appurtenant facilities (baseball fields, tennis courts, parking lots, sidewalks, etc.) in Buras, Louisiana in southern Plaquemines Parish (*Figure 1*) was damaged by storm flooding and wind. These facilities were deemed eligible for repair and/or replacement by the Federal Emergency Management Agency (FEMA) Public Assistance Grant Program. The objective of this program is to provide assistance to State, Tribal and local governments, and certain types of private nonprofit organizations, so that communities can quickly respond to, recover from, and mitigate major disasters and emergencies.

Plaquemines Parish Master Plan for the Government Complex in Belle Chase, Louisiana, includes the relocation of the FJFS from Buras to Belle Chase.

The Applicant, Louisiana Facility Planning and Control (FP&C) is requesting, through the Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP), grant funding for a change of location "*Improved Project*" to reconstruct the facilities in a different location and configuration with a revised site plan. The facilities will be upgraded to better meet the objectives of the action.

The purpose of the proposed action is fulfillment of the Master Plan objectives through repair of the FJFS and restoration of the lost function of facilities.

The Applicant's plans for the proposed action have been reviewed for effects in the base floodplain and are incorporated by reference herein.

FEMA is preparing a National Environmental Policy Act (NEPA) Environmental Assessment (EA), incorporated by reference herein, to analyze potential environmental impacts of the proposed project, including those affecting facilities in the base floodplain and protection of

wetlands. FEMA will use the findings in the EA to determine whether to prepare an Environmental Impact Statement (EIS) or a Finding of No Significant Impact (FONSI), and to support the floodplain and wetland “8-step” planning and public participation requirements in 44 CFR Part 9.

This project must be conducted in accordance with conditions for federal actions in the floodplain as set forth in presidential Executive Order 11988, *Floodplain Management* and presidential Executive Order 11990, *Protection of Wetlands* and the implementing regulation found at 44 Code of Federal Regulations (CFR) Part 9, *Floodplain Management and Protection of Wetlands*. These regulations apply to all Agency actions which have the potential to affect floodplains or wetlands or their occupants, or which are subject to potential harm by location in floodplains.

FEMA Public Assistance grant funded projects carried out in the floodplain should be coordinated with the local floodplain administrator for a floodplain development permit prior to the undertaking, and the action must be carried out in compliance with all relevant, applicable and required local codes and standards, so as to reduce the risk of future flood loss, minimize the impacts of floods on safety, health, and welfare, and preserve and possibly restore beneficial floodplain values as required by Executive Order 11988.

Furthermore, it is the policy of FEMA to provide leadership in floodplain management and the protection of wetlands. Specifically, FEMA shall take action to:

- (1) Avoid long- and short-term adverse impacts associated with the occupancy and modification of floodplains and the destruction and modification of wetlands;
- (2) Avoid direct and indirect support of floodplain development and new construction in wetlands wherever there is a practicable alternative;
- (3) Reduce the risk of flood loss;
- (4) Promote the use of nonstructural flood protection methods to reduce the risk of flood loss;
- (5) Minimize the impact of floods on human health, safety and welfare;
- (6) Minimize the destruction, loss or degradation of wetlands;
- (7) Restore and preserve the natural and beneficial values served by floodplains;
- (8) Preserve and enhance the natural values of wetlands;
- (9) Involve the public throughout the floodplain management and wetlands protection decision-making process;

(10) Adhere to the objectives of the Unified National Program for Floodplain Management; and

(11) Improve and coordinate the Agency's plans, programs, functions and resources so that the Nation may attain the widest range of beneficial uses of the environment without degradation or risk to health and safety.

44 CFR 9.6 details an eight-step process that decision-makers must use when considering projects that have potential impacts to or within the floodplain. The 8-step process assesses the action with regard to human susceptibility to flood harm and impacts to wetlands. The 8-step analyzes principle flood problems, risks from flooding, history of flood loss, and existing flood protection measures. The process includes public notice and opportunity for the public to have early and meaningful participation in decision-making and alternative selection. In conjunction with the EA development, the 8-step process formulates and describes considered alternatives; determines their practicability; and includes requirements to incorporate measures to minimize and mitigate potential risks from flooding and impacts to wetlands.

Existing Conditions

In July 2005, FEMA initiated a series of flood insurance studies for many of the Louisiana coastal parishes as part of the Flood Map Modernization effort through FEMA's National Flood Insurance Fund. These studies were necessary because the flood hazard and risk information shown on many Flood Insurance Rate Maps (FIRMs) was developed during the 1970s, and the physical terrain had changed significantly, to include the major loss of wetland areas. After Hurricanes Katrina and Rita, FEMA expanded the scope of these studies to include all of coastal Louisiana. The magnitude of the impacts of hurricanes Katrina and Rita reinforced the urgency to obtain current flood data for the coastal zones of Louisiana. New data obtained after the hurricane – including information on levees and levee systems and high water mark information – allowed for a more detailed analysis (LaMP, 2007).

During an initial post-hurricane analysis, FEMA determined that the “100-Year” or 1-percent annual chance storm flood elevations, referred to as Base Flood Elevations, on FIRMs for many Louisiana communities, were too low. FEMA created recovery maps showing the extent and magnitude of hurricanes Katrina's and Rita's surge, as well as information on other storms over the past 25 years (Lamp 2007). The 2006 advisory flood data shown on the recovery maps for the Louisiana-declared disaster areas show high-water marks surveyed after the storm; flood limits developed from these surveyed points; and Advisory Base Flood Elevations, or ABFEs. The recovery maps and other advisory data were developed to assist parish officials, homeowners, business owners, and other affected citizens with their recovery and rebuilding efforts (LaMP 2007).

Following an intensive five-year mapping initiative, FEMA provided updated preliminary flood hazard maps, known as Preliminary Digital Flood Insurance Rate Maps (DFIRMs), to all of Louisiana's coast parish communities. Released in 2008, these maps are based on the most technically advanced studies ever and were subjected to multiple levels of review. The DFIRMs

provided communities with a more scientific approach to economic development, hazard mitigation planning, emergency response, and post-flood recovery (LaMP 2007).

The U.S. Army Corps of Engineers (USACE) is currently working on a Hurricane and Storm Damage Risk Reduction System (HSDRRS) for the Greater New Orleans (GNO) area, designed to protect the GNO area from the 1-percent annual chance of flood. This 350-mile system of levees, floodwalls, surge barriers, and pump stations reduces the flood risk associated with a storm event. A perimeter levee system protects the area from the coastal surge and the Mississippi River flooding. Pump stations are located along the perimeter levee to discharge local runoff into the exterior lakes or the Mississippi River. Local pump stations perform the same function along interior levees and discharge to marshy areas designated to collect flood water from developed areas. Two major closure complexes, the West Closure Structure Complex and the Inner Harbor Navigation Canal Complex, keep the surge from entering the major canals and navigation channels within the New Orleans area.

FEMA specifies that all levees must have a minimum freeboard of three (3) feet against 1-percent annual chance flooding to be considered a safe flood protection structure. The HSDRRS meets the FEMA freeboard requirement and in September of 2011, the USACE provided FEMA with assurances that the HSDRRS is capable of defending against a storm surge with a 1-percent annual chance event of occurring in any given year (Miller 2011).

Accordingly, in 2012 FEMA revised the preliminary DFIRMS for areas within the HSDRRS to incorporate the reduced flood risk associated with the system improvements. The 2012 Revised Preliminary DFIRMS are currently viewed as the best available flood risk data for the five GNO parishes. In many areas, the flood risk has been significantly reduced due to heightened protection. Areas protected by the HSDRRS include portions of St. Bernard, St. Charles, Jefferson, Orleans, and Plaquemines parishes (includes the entire area of the proposed action).

Impacts of Flooding

In compliance with FEMA policy implementing EO 11988, Floodplain Management, the proposed project was reviewed for possible impacts associated with occupancy or modification to a floodplain or wetland. No project should be built to a floodplain management standard that is less protective than what the community has adopted in local ordinances through their participation in the National Flood Insurance Program.

In compliance with FEMA policy implementing EO 11988, the proposed project was reviewed for possible impacts associated with occupancy or modification of a floodplain. Plaquemines Parish enrolled in the NFIP on January 17, 1985. According to the NFIP Revised Preliminary Flood Insurance Rate Map panel number 22075C0039E (FEMA, 2012a), dated November 9, 2012 (Figure XX), the proposed project site lies within a special flood hazard area zone AE, the 1-percent-annual-chance base floodplain base flood elevation (BFE) determined, elevation -2 feet above mean sea level North American Vertical Datum 1988 (i.e., the 100-year floodplain).

Wetlands

According to the U.S. Fish & Wildlife Service (USFWS) National Wetlands Inventory (NWI) map, the proposed project

STEP 1 Determine whether the proposed action is located in a wetland and/or the 100-year floodplain (500-year floodplain for critical actions [44 CFR 9.4]), or whether it has the potential to affect or be affected by a floodplain or a wetland (see 44 CFR 9.7).

The projects are located in a floodplain as mapped by:
Effective FIRM Panel #22075C0039E, dated 11/9/2012, and shows this site in zone AE, with Base Flood Elevations determined as:
(EL -2 Feet NAVD88)

The project is located in a wetland as identified by:

The U.S. Fish and Wildlife National Wetland Inventory indicates portions of the proposed action are located in a mapped wetland or U.S. waters.

STEP 2 Notify the public at the earliest possible time of the intent to carry out an action in a floodplain or wetland, and involve the affected and interested public in the decision making process (see 44 CFR 9.8).

Not applicable - Project is not located in a floodplain or in a wetland.

Applicable - Notice will be or has been provided by: A cumulative Public Notice was published in the New Orleans Times Picayune, Baton Rouge Advocate, Lafayette Daily Advertiser, Lake Charles American Press and the Hammond Star on November 7th - November 9th, 2005.

FEMA has invited the public to comment on the proposed action during a fifteen (15) day comment period. A public notice will be published for three (3) days in the local newspaper, *The Times-Picayune*, announcing the availability of this draft EA for review at the Plaquemines Parish Belle Chase Library at 8442 Highway 23, Belle Chase, LA, 70037.

STEP 3 Identify and evaluate practicable alternatives to locating the proposed action in a floodplain or wetland (including alternative sites, actions and the "no action" option) [see 44 CFR 9.9]. If a practicable alternative exists outside the floodplain or wetland, FEMA must locate the action at the alternative site.

- Not applicable - Project is not located in a floodplain or in a wetland.
- Applicable - Alternative identified in the EA Document or is described below:

- **Alternative 1: No Action** - Under the No Action alternative, the FJFS would not be repaired or reconstructed. Consequently, this facility would not be restored, enhanced or upgraded for football and other recreational activities.
- **Alternative 2: Reconstruct Improved Facilities at an Alternate Location** - Under this alternative, the FJFS and appurtenant facilities would be reconstructed in a new location at the existing Consolidated Plaquemines Parish Government Complex in Belle Chase, Louisiana. Activities would include construction of supporting facilities including parking lots, sidewalks, landscaping, and supporting utilities.
- **Alternative 3: Reconstruct at Original Site** - Under this alternative, the FJFS and appurtenant facilities would be reconstructed in the original location to predisaster function, capacity and footprint. Activities would include construction of supporting facilities including parking lots, sidewalks, landscaping, and supporting utilities.

STEP 4

Identify the full range or potential direct or indirect impacts associated with, the occupancy or modification of floodplains and wetlands and the potential direct and indirect support of floodplain and wetland development that could result from the proposed action (see 44 CFR 9.10).

- Not applicable - Project is not located in a floodplain or in a wetland.
- Applicable - Alternatives are described below:

Alternative 1 - No Action

Under the No Action alternative, there would be no adverse impacts within the floodplain and no additional investment at risk. Beneficial values of the base floodplain would likely be restored in previously developed areas.

Alternative 2 – Reconstruct Improved Facilities at an Alternate Location

- Reconstructing the FJFS at an alternate location with improvements would restore the lost recreational benefits. Reconstruction would also maintain a significant investment in the base floodplain and exposes facilities to flood hazards. Rebuilding the FJFS forgoes an opportunity to restore the natural and beneficial values of the floodplain. Reconstruction will also increase the useful life of the facilities. Reconstructing facilities in the floodplain would have increased costs

associated with floodplain development mitigation and minimization requirements and compliance with floodplain codes and standards.

Alternative 3 – Reconstruct at Original Site- Reconstructing the FJFS in the original location would restore the lost recreational benefits. Reconstruction at the original site would also maintain a significant investment in the base floodplain and expose facilities to flood hazards. Reconstructing forgoes an opportunity to restore the natural and beneficial values of the floodplain. The repair would accommodate the existing uses of the floodplain and reinforce existing land use patterns which have developed without reflection on hazard and risk minimization. Reconstruction will also increase the useful life of the facilities. Reconstructing facilities in the floodplain would have increased costs associated with floodplain development mitigation and minimization requirements and compliance with floodplain codes and standards.

STEP 5 Minimize the potential adverse impacts and support to or within floodplains and wetlands to be identified under step # 4, restore and preserve the natural and beneficial values served by floodplains, and preserve and enhance the natural and beneficial values served by wetlands (see 44 CFR 9.11).

- Not applicable - Project is not located in a floodplain or in a wetland.
- Applicable – Reconstruction/Reconfiguration shall be completed in accordance with all local floodplain ordinances with applicable codes and standards applied to mitigate and minimize adverse effects (compliance with minimum National Flood Insurance Program standards and requirements). In order to minimize indirect impacts (erosion, sedimentation, dust and other construction-related disturbances) to the nearby waters of the United States and well-defined drainage areas surrounding the site, the contractor should implement Best Management Practices (BMPs) that meet the Louisiana Department of Environmental Quality’s (LDEQ’s) permitting specifications for storm water discharge regulated under §§ 401 and 402 of the CWA, and include the following into the daily operations of the construction activities: silt screens, barriers (e.g., hay bales), berms/dikes, and/or fences to be placed where and as needed. Fencing will be placed for marking staging areas to store construction equipment and supplies as well as to conduct maintenance/repair operations.

STEP 6 Reevaluate the proposed action to determine first, if it is still practicable in light of its exposure to flood hazards, the extent to which it will aggravate the hazards to others. And its potential to disrupt floodplain and wetland values and second, if alternatives preliminarily rejected at step # 3 are practicable in light of the information gained in steps # 4 and # 5. FEMA shall not act in

a floodplain or wetland unless it is the only practicable location (see 44 CFR 9.9).

- Not applicable - Project is not located in a floodplain or in a wetland.
- Applicable - The proposed action is the only practicable alternative based upon a review of possible adverse effects on the floodplain and community and socioeconomic expectations.

STEP 7 Prepare and provide the public with a finding and public explanation of any final decision that the floodplain or wetland is the only practicable alternative (see 44 CFR 9.12).

- Not applicable - Project is not located in a floodplain or in a wetland.
- Applicable - Finding is or will be prepared as described below:

A Public Notice will be published as part of the NEPA Environmental Assessment for the proposed action.

STEP 8 Review the implementation and post-implementation phases of the proposed action to ensure that the requirements of the order are fully implemented. Oversight responsibility shall be integrated into existing processes.

- Not applicable - Project is not located in a floodplain or in a wetland.
- Applicable –

Review the implementation and post-implementation phase of the proposed action to ensure that the requirement stated in 9.11 are fully implemented.

- Applicable - Oversight responsibility established as follows:

Appendix C
Public Notice

**FEMA'S PUBLIC NOTICE OF AVAILABILITY FOR
FORT JACKSON FOOTBALL STADIUM, CHANGE OF LOCATION PROJECT,
PLAQUEMINES PARISH, LOUISIANA
DRAFT ENVIRONMENTAL ASSESSMENT AND
DRAFT FINDING OF NO SIGNIFICANT IMPACT**

Interested parties are hereby notified that the Federal Emergency Management Agency (FEMA) prepared a Draft Environmental Assessment (DEA) for a proposed change of location of the Hurricane Katrina damaged Fort Jackson Football Stadium located in Buras in Plaquemines Parish, Louisiana. The Parish requested approval and federal grant funds for a change of location improved project to replace the former eligible football field facilities with facilities providing similar functions at the Plaquemines Parish Consolidated Government Complex located at F. Edward Hebert Blvd, Belle Chase LA (29.8975, - 89.9738). The proposed action includes construction of a new stadium and appurtenant facilities such as parking, roads, sidewalks, and supporting utilities. The new football field would provide important sport facility needs to the Plaquemines Parish community. Construction activities would include, where necessary, site clearing, grading, driveway construction, and placement of appurtenant utilities (electricity, water, and sewer) for the site.

Plaquemines Parish seeks federal grant funds for this action eligible under a Presidential Disaster Declaration, signed on August 29, 2005 (FEMA-1603-DR-LA). Per the National Environmental Policy Act (42 U.S.C. 4371 *et seq.*), and associated environmental statutes, a DEA has been prepared to evaluate the action's potential impacts on the human and natural environment. This DEA summarizes the purpose and need, site selection process, alternatives to the proposed action, affected environment, and potential environmental consequences associated with the proposed action.

The DEA and draft Finding of No Significant Impact (FONSI) will be available for public review at the Belle Chasse Library at 8442 Hwy 23, Belle Chasse, LA 70037 (hours are 8:00 AM to 5:00 PM, Mon.-Fri. and 8:30 AM to 12:30 PM Sat.) and the Buras Library at 35572 Hwy 11 Buras, LA 70041 (hours are 8:30 AM to 5:00 PM, Mon.-Fri.) during the public comment period from November 9, 2013, through November 23, 2013. Additionally, a public notice regarding the proposed action will be published in The Times-Picayune newspaper for the five (5) publishing days: October 30, 2013, November 1, 2013, November 3, 2013, November 6, 2013, and November 8, 2013. The comment period will be fifteen (15) days, beginning on November 9, 2013, and concluding on November 23, 2013. Written comments on the DEA/Draft FONSI or related matters can be faxed to FEMA's Louisiana Recovery Office at (504) 762-3232; or mailed to FEMA Louisiana Recovery Office, EHP – Fort Jackson Football Field EA, 1 Seine Court, New Orleans, Louisiana 70114. The DEA can be viewed and downloaded from FEMA's website: <http://www.fema.gov/environmental-planning-and-historic-preservation-program/environmental-documents-public-notices-2>.

Based on FEMA's findings to date, no significant adverse environmental effects are anticipated. However, if FEMA receives new information that results in a change from no adverse effects then FEMA would revise the findings and issue a second public notice allowing time for additional comments. However, if there are no changes, this DEA will become the Final EA.

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

Appendix D
Site Construction Plan

Plan Plate 1 - Site Layout Plan with Coordinates



Plan Plate 2 – Artist Rendition of Future Site Incorporating the Football Stadium

BUILDING A
 Parish President
 Department of Administration
 Department of Operations
 Department of Public Service
 Council Offices
 Safety and Permits
 Engineering
 Council Chambers

BUILDING B
 Clerk of Court
 Courts
 District Attorney

BUILDING C
 Assessor
 Sheriff
 Future Expansions





PLAQUEMINES PARISH LAND USE PLAN SKETCH
December 27, 2010
Prepared By: Perez, A Professional Corporation

Appendix E
Agency Correspondence