

Draft Environmental Assessment

First United Methodist Church of Slidell Improved Project

St. Tammany Parish, Louisiana
January 2014



FEMA

**U.S. Department of Homeland Security
Federal Emergency Management Agency, Region VI
Louisiana Recovery Office
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ACRONYMS AND ABBREVIATIONS

| | |
|---------|---|
| APE | Area of Potential Effects |
| ABFE | Advisory Base Flood Elevation |
| BFE | Base Flood Elevation |
| BMP | Best Management Practices |
| CAA | Clean Air Act |
| CBRA | Coastal Barrier Resources Act |
| CBRS | Coastal Barrier Resources System |
| CEQ | Council on Environmental Quality |
| CERCLA | Comprehensive Environmental Response, Compensation, and Liability Act |
| CFR | Code of Federal Regulations |
| CMD | Coastal Management Division |
| CO | Carbon Monoxide |
| CPRA | Coastal Protection Restoration Authority |
| CWA | Clean Water Act |
| CZMA | Coastal Zone Management Act |
| CUP | Coastal Use Permit |
| dB | Decibels |
| DNL | Day-Night Average Sound Level |
| DFIRM | Digital Flood Insurance Rate Map |
| EA | Environmental Assessment |
| e.g. | For Example |
| EIS | Environmental Impact Statement |
| EO | Executive Order |
| ESA | Endangered Species Act |
| et seq. | And What Follows |
| F° | Fahrenheit |
| FEMA | Federal Emergency Management Agency |
| FIRM | Flood Insurance Rate Map |
| FONSI | Finding of No Significant Impact |
| FPPA | Farmland Protection Policy Act |
| FUMC | First United Methodist Church |
| GED | General Education Development |
| GOHSEP | Governor's Office of Homeland Security and Emergency Preparedness |
| i.e. | That Is |
| IPaC | Information, Planning, and Conservation |
| LA | Louisiana |
| LADOTD | Louisiana Department of Transportation and Development |
| LDEQ | Louisiana Department of Environmental Quality |
| LDNR | Louisiana Department of Natural Resources |
| LDWF | Louisiana Department of Wildlife and Fisheries |
| LGS | Louisiana Geological Survey |
| LPDES | Louisiana Pollutant Discharge Elimination System |
| LSU | Louisiana State University |
| MDO | Mother's Day Out |
| mph | Miles Per Hour |

| | |
|-------------------|--|
| NAAQS | National Ambient Air Quality Standards |
| NEPA | National Environmental Policy Act |
| NFIP | National Flood Insurance Program |
| NHPA | National Historic Preservation Act |
| NMFS | National Marine Fisheries Service |
| NO ₂ | Nitrogen Dioxide |
| NPDES | National Pollutant Discharge Elimination System |
| NRHP | National Register of Historic Places |
| NRCS | Natural Resources Conservation Service |
| NWI | National Wetlands Inventory |
| O ₃ | Ozone |
| OCM | Office of Coastal Management |
| OPA | Otherwise Protected Area |
| PM _{2.5} | Particulate Matter Less Than 2.5 Micrometers in Diameter |
| PM ₁₀ | Particulate Matter Less Than 10 Micrometers in Diameter |
| PA | Programmatic Agreement |
| PA | Public Assistance |
| Pb | Lead |
| PCB | Polychlorinated Biphenyls |
| RCRA | Resource Conservation and Recovery Act |
| RHA | Rivers & Harbors Act |
| SELA | Southeastern Louisiana |
| SFHA | Special Flood Hazard Area |
| Sgt. | Sergeant |
| SHPO | State Historic Preservation Office/Officer |
| SO ₂ | Sulfur Dioxide |
| sq ft | Square Feet |
| sq mi | Square Miles |
| SWPPP | Stormwater Pollution Prevention Plan |
| TMDL | Total Maximum Daily Load |
| TSCA | Toxic Substances Control Act |
| U.S. | United States |
| 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 near Buras, Louisiana (LA) as a Category 3 storm. Maximum sustained winds at landfall were estimated at 125 miles per hour and were accompanied by a 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 major disaster declaration (FEMA-1603-DR-LA) on the same day, authorizing the Department of Homeland Security's Federal Emergency Management Agency (FEMA) to provide federal assistance in designated areas of Louisiana.

The Applicant (First United Methodist Church of Slidell or FUMC) has 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 (PA) Program to fund projects to repair, restore, and replace facilities damaged as a result of the declared event. The Applicant has determined that repair of the damaged facilities to their pre-Katrina specifications would not be in the best interest of the community. Consequently, in accordance with 44 Code of Federal Regulations (CFR) Section 206.203(d), the FUMC has requested an Improved Project. An Improved Project is any project where the applicant chooses to make additional improvements to the facility while making disaster repairs. An Improved Project restores the facility and maintains its function or maintains the function in another existing or new facility.

In accordance with 44 CFR, Chapter 1, Part 10.9, an Environmental Assessment (EA) is being prepared in compliance with 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 C.F.R. Sections 1500-1508). This Environmental Assessment (EA) will determine if the proposed Improved Project will have the potential for significant adverse effects on the quality of the human and natural environment. The results of this EA will be used to make a decision whether to initiate preparation of an Environmental Impact Statement or to prepare a Finding of No Significant Impact (FONSI).

1.2 Area Description

St. Tammany Parish is located on the north shore of Lake Pontchartrain in southeastern Louisiana. The Parish encompasses an area of approximately 1,124 square miles (sq mi). It is bounded by Washington Parish to the north; Pearl River County, Mississippi to the northeast; Hancock County, Mississippi and St. Bernard Parish to the southeast; Orleans Parish to the southwest; and Tangipahoa Parish to the west.

Major transportation routes within St. Tammany Parish include Interstate Routes 10, 12, and 59; U.S. Routes 90, 190, and 11; and the Lake Pontchartrain Causeway, which connects the Parish to New Orleans, LA. Due to the close proximity of metropolitan New Orleans, ease of transportation with the Lake Pontchartrain Causeway and Interstate Routes, and the availability of undeveloped land, St. Tammany Parish offers good potential for both commercial and residential development (FEMA 2008a).

Agriculture is the Parish's largest industry and is comprised of many nurseries, ranches, dairy farms, and poultry farms. Brick making and forestry are also important industries for St. Tammany Parish due to the area's abundance of raw materials. Smaller industries include ship yards, fabricated metal products, roofing, concrete products, and industrial gases.

The climate of the area is generally influenced by the Gulf of Mexico, giving it a semitropical marine character. Major rainfall comes from tropical storms moving inland. Annual average rainfall for the area is 62 inches and the average annual temperature ranges from 52 degrees Fahrenheit (F°) in the winter to 82 F° in summer (FEMA 2008b).

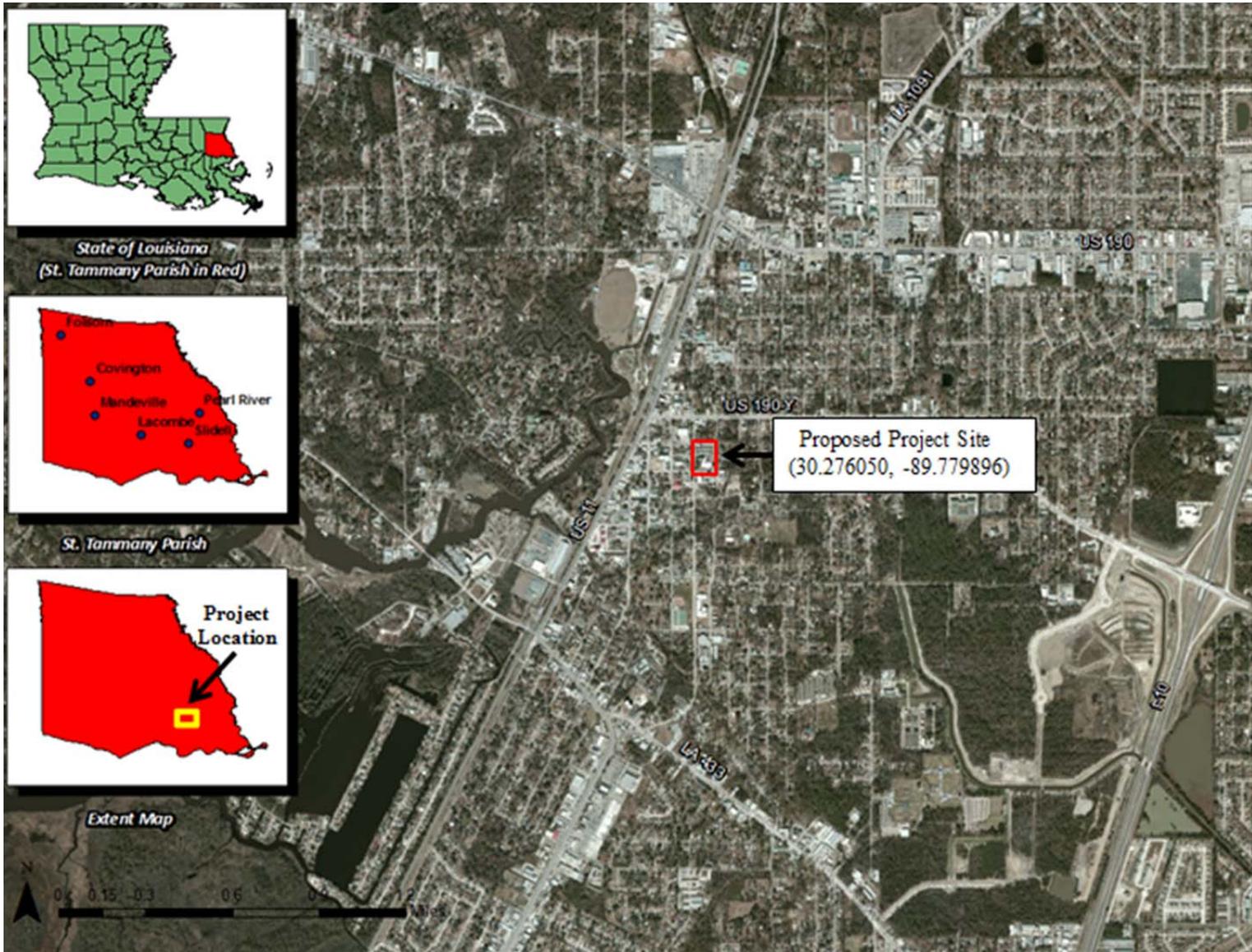


Figure 1 – Project Vicinity Map (ESRI 2013)

1.3 Site Description

The FUMC is site located at 433 Erlanger Avenue, Slidell, LA 70458 (Latitude 30.276050, Longitude -89.779896) and encompasses an entire city block. The property was purchased by the Applicant in 1957. On August 29, 2005, Hurricane Katrina made final landfall near the Slidell area around 9:45 a.m. Central Standard Time. The storm inundated the FUMC site with close to 5 feet of water, destroying 95% of the complex's contents.

Prior to the disaster event, the complex consisted of the Education and Administration Building (formerly known as Fellowship Hall), the Mears Building (used for Sunday school classes and storage), the Sanctuary, and the Family Life Center (contained meeting rooms and a gymnasium)(Figure 2). Following the storm, the Sanctuary and Family Life Center were both fully repaired. The Mears Building has been demolished and replaced with a new playground. The Education and Administration Building has only been minimally repaired so as to carry out basic functions.



Figure 2 - Aerial View of Proposed Project Site (Google Earth 2013)

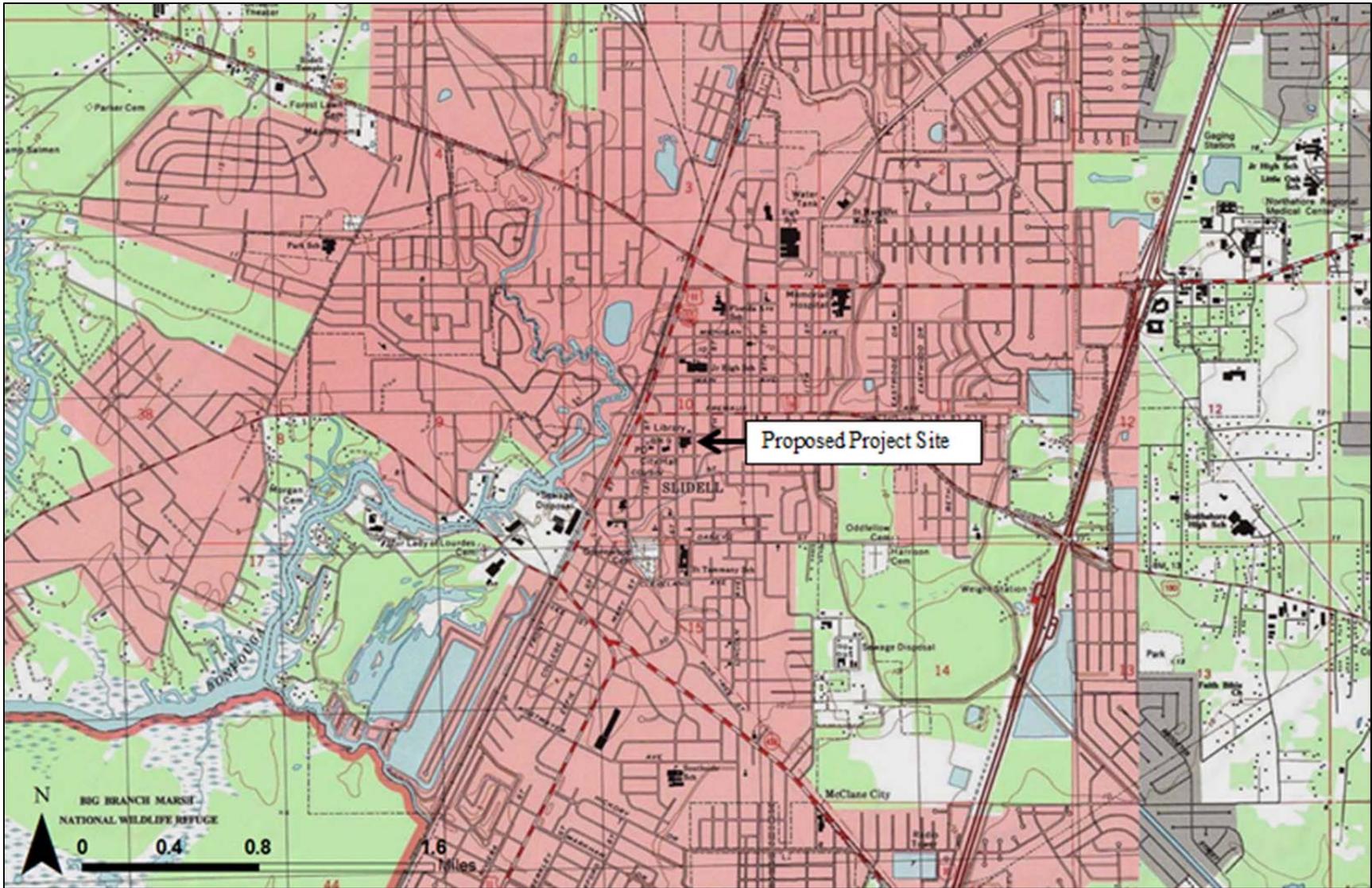


Figure 3 - Topographic View of Proposed Project Site (ESRI 2013)

2.0 PURPOSE AND NEED FOR THE PROPOSED ACTION

The objective of the PA 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. The mission of the FUMC's Preschool, Community Outreach Programs, and Mother's Day Out (MDO) Program is to provide developmentally appropriate education activities by qualified teachers and, additionally, to provide support and essential family services to the community (FUMC 2013). Prior to Hurricane Katrina, the FUMC Education and Administration building was used for a pre-school, office space, and community outreach classes (e.g. GED program, Tiger Cubs, Boys Scouts, the Slidell Photography Club). Additionally, the facility was also used to administer the FUMC's MDO Program. The MDO program is a support service available to families and has two primary objectives: 1) provide a stable environment where children can learn to form bonds with adults other than their primary caregivers and 2) provide primary caregivers with free time to run errands, work, or go to school (FUMC 2013).

The Education and Administration Building suffered damages resulting from Hurricane Katrina and, as previously mentioned, has been only minimally repaired since. This structure encompasses 14,400 square feet (sq ft) and is comprised of four distinct wings. The southern wing of the facility, primarily used for pre-school and MDO activities prior to the storm, is currently functioning as storage space due to these damages. Remaining sections of the facility are currently being used mainly for administrative functions, though these capabilities have also been significantly impacted. The facility's pre-school and MDO functions have been temporarily relocated to the Family Life Center.

The damage to the FUMC caused by Hurricane Katrina greatly reduced the Applicant's ability to provide needed services to the local community. Restoration of these services is necessary for the community to fully recover from the impact of the storm. The purpose of this project is to restore and improve community access to quality education and family services. The need for the project is defined by the Applicant's current lack of functioning facilities.



Figure 4 - Pre-Katrina Layout of Education and Administration Building (Google Earth 2013)

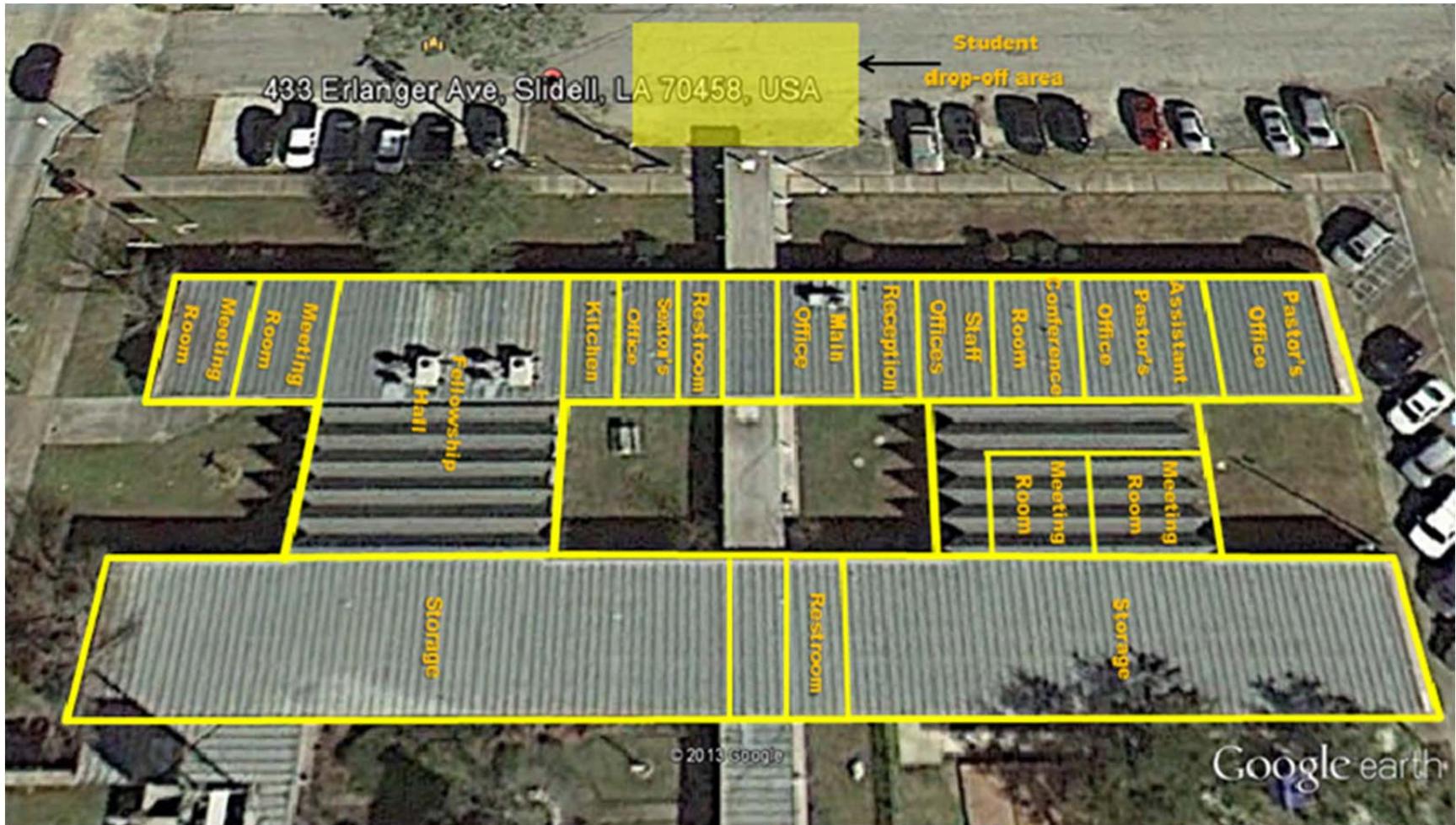


Figure 5 - Current Layout of Education and Administration Building (Google Earth 2013)

3.0 ALTERNATIVES CONSIDERED

This section describes alternatives proposed and considered in addressing the purpose and need stated in Section 2.0 above. The NEPA process consists of an evaluation of the environmental effects of a federal action, including its alternatives. The identification and evaluation of the purpose and need of a project is essential in establishing a basis for the development of the range of reasonable alternatives required in an EA, and assists with the identification and eventual selection of a preferred alternative.

Under NEPA, the term “reasonable alternatives” is generally understood to mean those technically, economically and legally practical or feasible project alternatives that would satisfy the primary objectives of the project defined in the Purpose and Need statement (FEMA 1996; CEQ 1981).

Four alternatives have been proposed and reviewed for this project. They include: 1) No Action; 2) Construction of a new multi-level facility at the current FUMC site; 3) Relocation of facilities to an alternate site; and 4) Consolidation of the Education and Administration Building (Proposed Action).

3.1 Alternative 1 – No Action

Under the No Action Alternative, no improvements or construction activities would occur at the FUMC. This alternative does not meet the purpose and need; however, it will continue to be evaluated throughout this EA to serve as a baseline for comparison of action impacts.

3.2 Alternative 2 – Construction of Multi-Level Facility

Under this alternative, a multi-level facility would be constructed at the same location as the proposed project site to carry out the functions of the Education and Administration Building. This alternative is not cost-effective due to the foundations improvements necessary at the site to construct such a structure. However, this alternative meets the purpose and need and will be continued to be evaluated throughout this EA.

3.3 Alternative 3 – Relocation of Facilities to an Alternate Site

Under this alternative, the Applicant would construct the proposed FUMC facilities at another site. This alternative is not considered feasible as no sites were identified within the vicinity of the FUMC, creating logistical problems related to transportation needs. Relocation outside of the vicinity of the FUMC would leave the community it is intended to support without its needed services. This alternative therefore does not meet the purpose and need of the proposed action and will be eliminated from further consideration.

3.4 Alternative 4 – Consolidation of Education and Administration Building (Proposed Action)

The scope of work for this alternative proposes renovations to the Education and Administration Building that would add roughly 4,000 sq ft of new classroom/MDO space and, additionally, reconfigure the current layout of the facility (Figure 6). The improvements and additions proposed in this alternative would be completed in phases. Specifically, the proposed scope of work includes:

- Phase I: renovation of the south wing as necessary to convert areas currently being used for storage into classrooms, MDO space, and a multi-purpose room
- Phase II: renovations needed to relocate administrative offices currently located in the eastern end of the north wing to the western end of the north wing
- Phase III: construction of foundation, roofing, and walling, and demolition of the east and west wings as needed to convert current interior green spaces into additional classroom and MDO space
- Phase IV: renovation of current administrative areas, located in eastern end of the north wing, as necessary to transform them into classrooms
- Additionally, this alternative also includes the installation of a new entry driveway at west side of the building



Figure 6 – Aerial View of Proposed Action (Google Earth 2013)

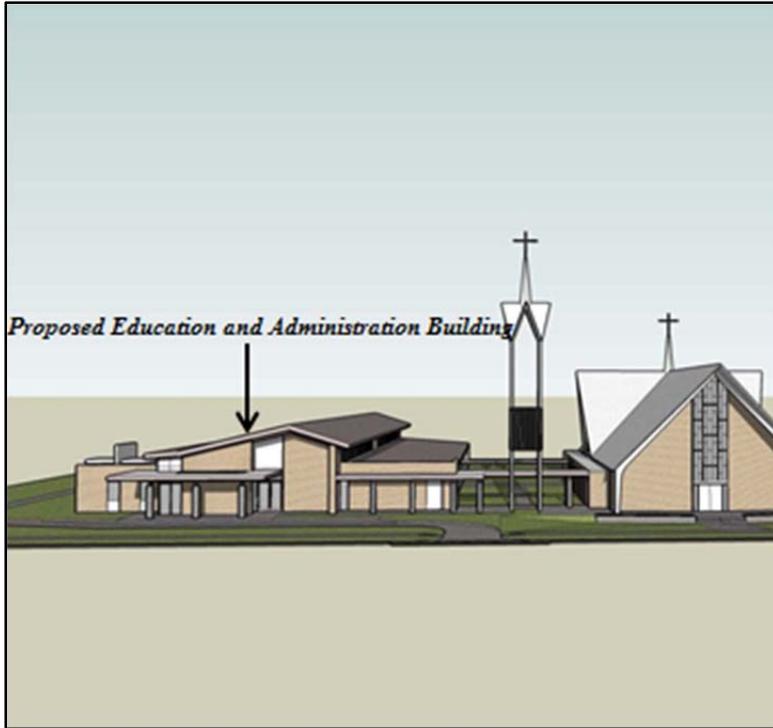
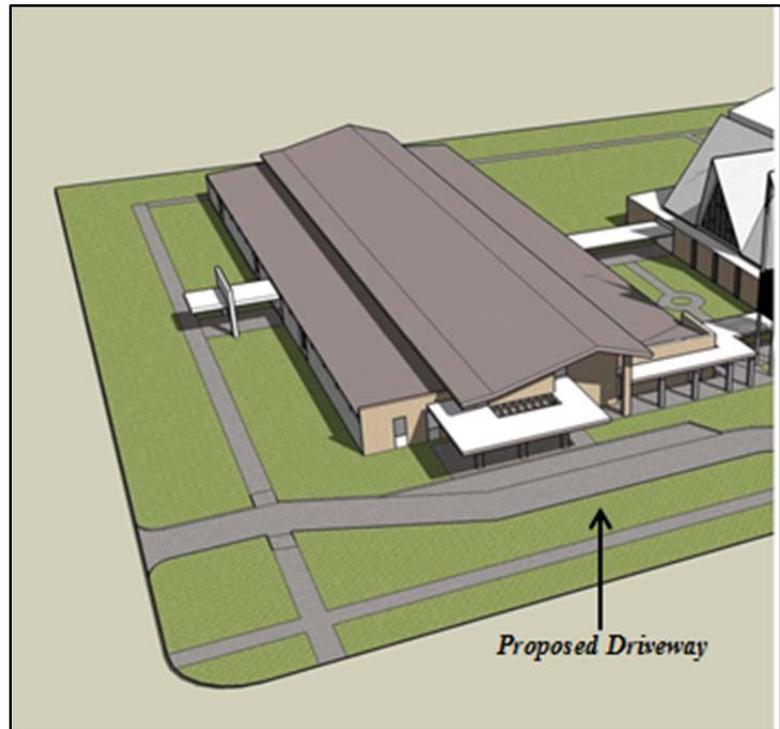


Figure 7 - Illustration of Proposed Action, View from 3rd Street/Sgt. Alfred Street (FUMC 2013)

Figure 8 - Illustration of Proposed Action, Overhead View (FUMC 2013)



4.0 AFFECTED ENVIRONMENT AND ALTERNATIVE ANALYSIS

4.1 Geology and Soils

4.1.1 Regulatory Setting

The Farmland Protection Policy Act (FPPA: P.L. 97-98, Sections 1539-1549; 7 U.S.C. 4201, *et seq.*) was enacted in 1981 and is intended to minimize the impact federal actions may have on the unnecessary and irreversible conversion of farmland to non-agricultural uses. It assures that, to the extent possible, federal programs and policies are administered to be compatible with state and local farmland protection policies and programs. To implement the FPPA, federal agencies are required to develop and review their policies and procedures every two years. The FPPA does not authorize the federal government to regulate the use of private or nonfederal land or, in any way, affect the property rights of owners.

The Natural Resources Conservation Service (NRCS) is responsible for protecting significant agricultural lands from irreversible conversions that result in the loss of essential food or environment sources. For purposes of the FPPA, farmland includes prime farmland, unique farmland, and land of statewide or local importance. Prime farmland is characterized as land with the best physical and chemical characteristics for production of food, feed, forage, fiber and oilseed crops (USDA 2013). 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 built-up land.

4.1.2 Existing Conditions

According to the Louisiana Geological Survey (LGS), the geology in the vicinity of the site is predominantly Pleistocene Terraces. This region is characterized by its underlying geology of Pleistocene (2.588 million to 11,800 years before present) and older sediments, which form terraces of decreasing elevation from north to south. In contrast to the Marginal Deltaic Basin and Mississippi River Deltaic Plain regions, the Pleistocene Terraces region is considered upland and has a distinct relief created by the stream valleys that cut into the underlying sands, gravels and clays.

The soils in St. Tammany Parish vary in their potential for major land uses and urban development. According to the USDA, NRCS Web Soil Survey, the soils in the proposed site include Myatt fine sandy loam and Stough fine sandy loam. Both Myatt fine sandy loam and Stough fine sandy loam consist of soils with low fertility and moderately slow permeability and both are predominantly woodlands (USDA 1990).

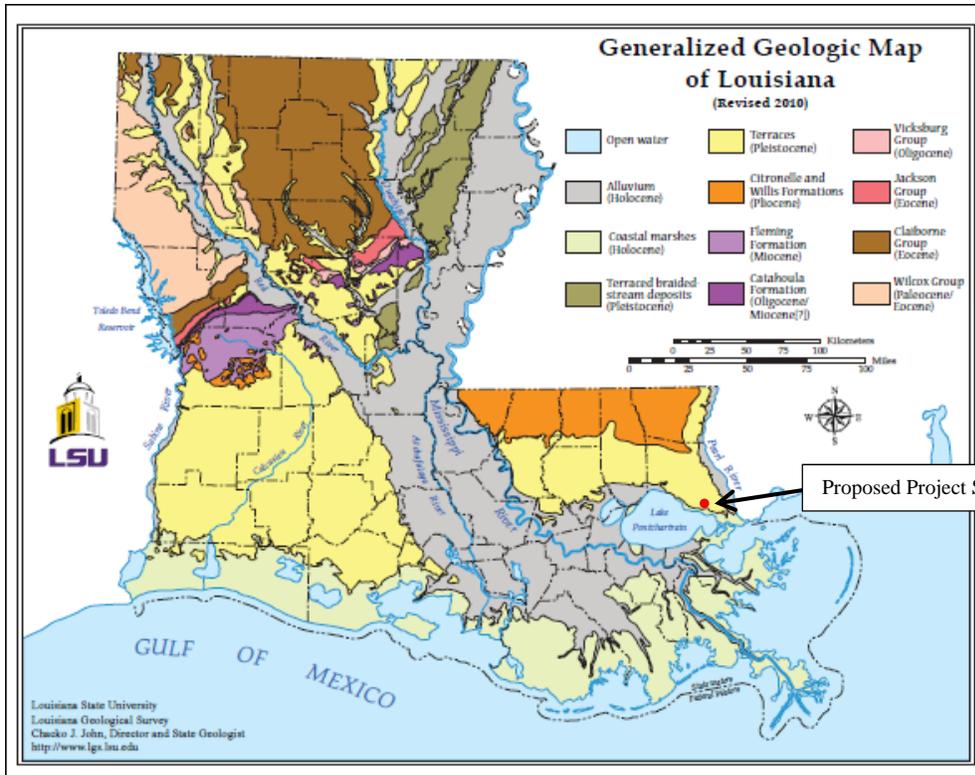


Figure 9 – Generalized Geologic Map of Louisiana (LSU 2010)

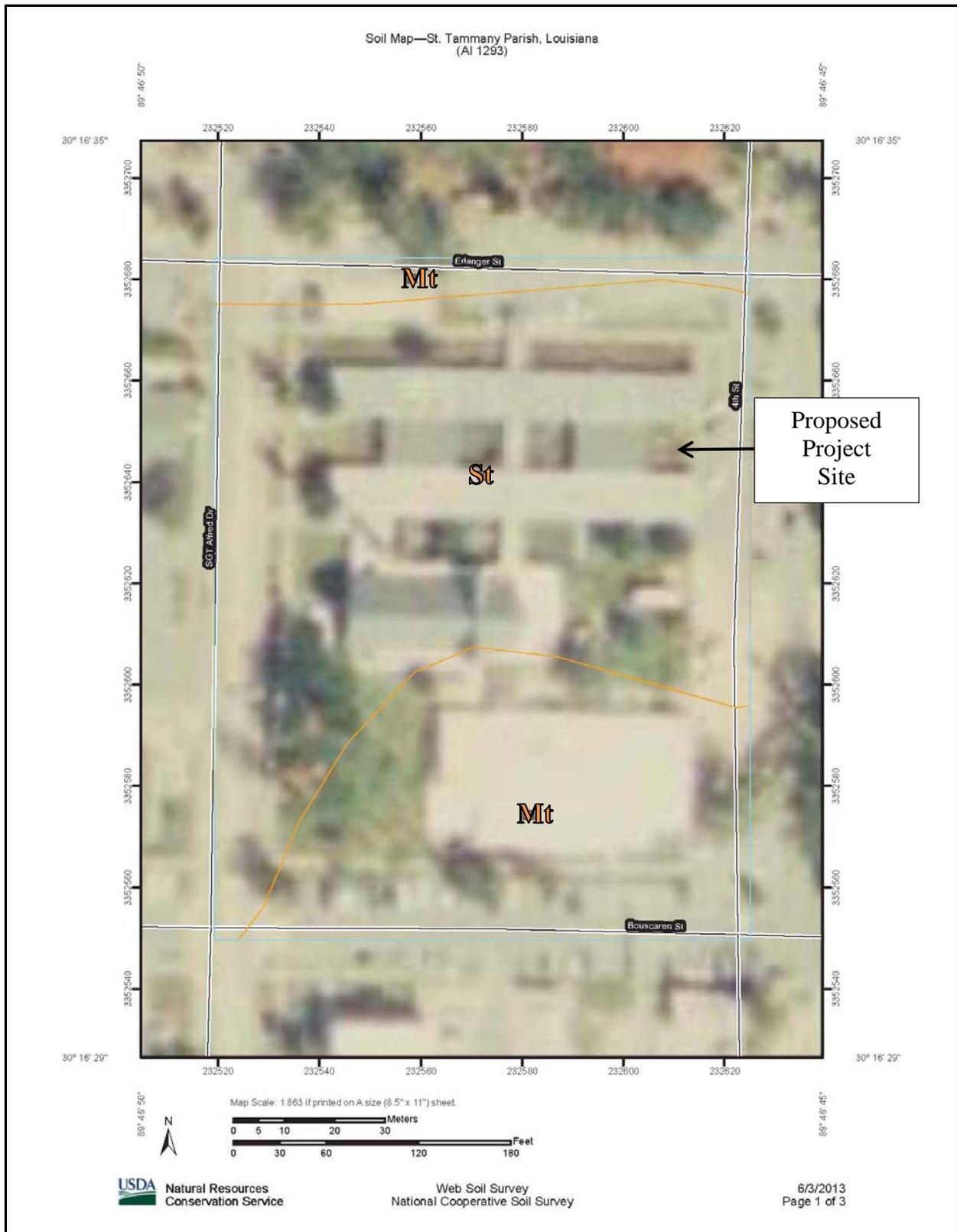


Figure 10 – NRCS Web Soil Survey Mapper (NRCS 2013)

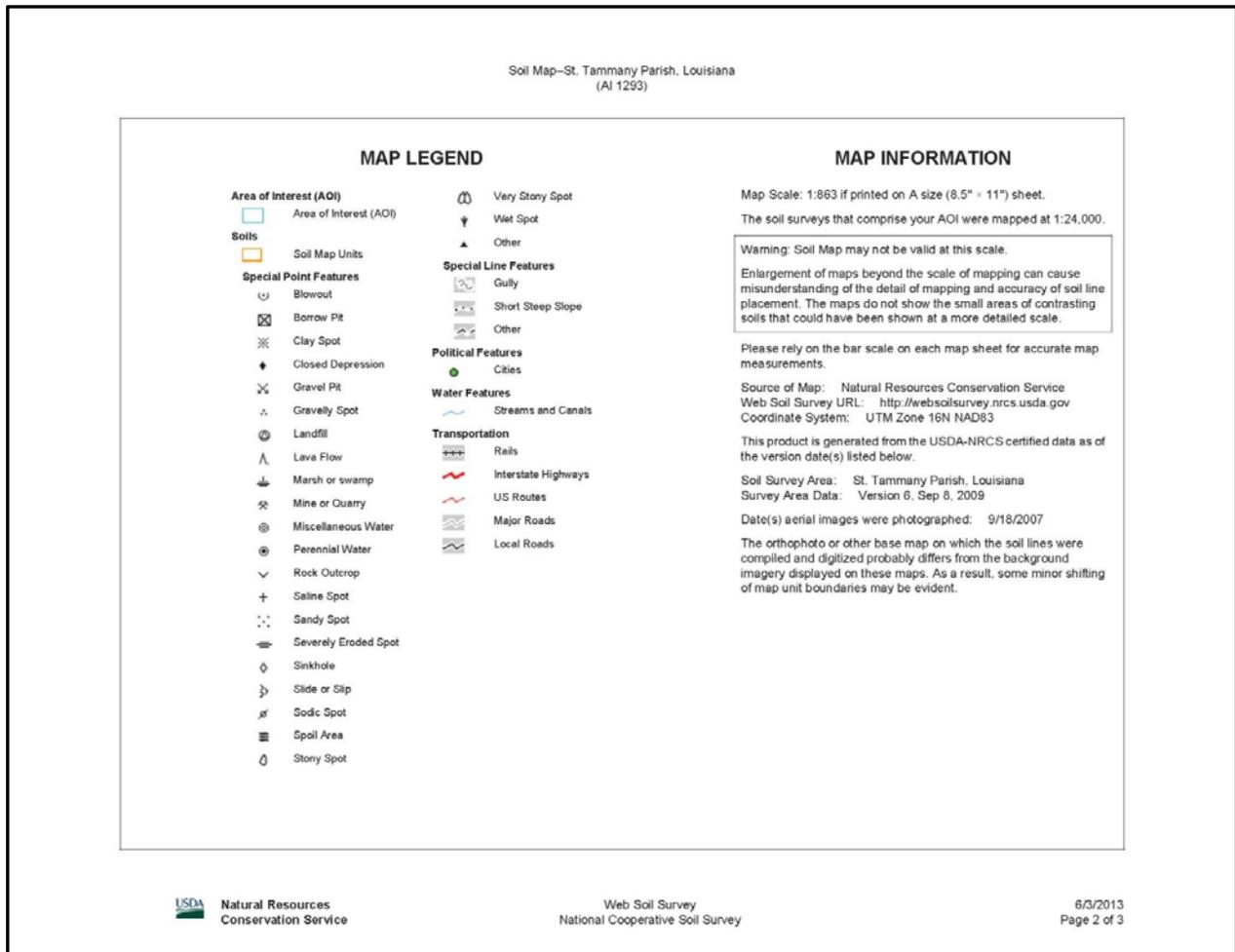


Figure 11 – NRCS Web Soil Survey Legend (NRCS 2013)

| St. Tammany Parish, Louisiana (LA103) | | | |
|---------------------------------------|------------------------|--------------|----------------|
| Map Unit Symbol | Map Unit Name | Acres in AOI | Percent of AOI |
| Mt | Myatt fine sandy loam | 1.3 | 37.2% |
| St | Stough fine sandy loam | 2.2 | 62.8% |
| Totals for Area of Interest | | 3.5 | 100.0% |

Table 1 – NRCS Classification Summary for Proposed Project Site (NRCS 2013)

4.1.3 Environmental Consequences

Alternative 1 – No Action

Implementation of the No Action Alternative would include no undertaking and, therefore, would not impact the soils or geologic processes known for the area.

Alternative 2 – Construction of Multi-Level Facility

This action alternative would temporarily impact soils, primarily as part of site preparation and building construction. Soils at the project site may be exposed during grading and trenching for utilities or other code upgrades. Additionally, installation of the proposed structure may result in compaction of all underlying soil, and the removal of other soil. However, this alternative would only include construction in areas that have already been disturbed, graded, and developed, and would not cause significant disturbance of geology or soils as part of the site preparation and building construction. Furthermore, the project will also not result in the conversion of any Prime, or State-wide and locally important farmlands.

Alternative 4 - Consolidation of Education and Administration Building (Proposed Action)

The Proposed Action Alternative would temporarily impact soils, primarily as part of site preparation and building construction. Soils at the project site may be exposed during grading and trenching for utilities or other code upgrades. Additionally, installation of the proposed addition may result in compaction of all underlying soil, and the removal of other soil. However, this alternative would only include construction in areas that have already been disturbed, graded, and developed, and would not cause significant disturbance of geology or soils as part of the site preparation and building construction. Furthermore, the project will also not result in the conversion of any Prime, or State-wide and locally important farmlands.

4.2 Waters of the United States and Wetlands

4.2.1 Regulatory Setting

The United States Army Corps Engineers (USACE) regulates the discharge of dredged or fill material into waters of the U.S., including wetlands, pursuant to Sections 401 and 404 of the Clean Water Act (CWA). Wetlands are identified as those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, or that under normal hydrologic conditions do or would support, a prevalence of vegetation typically adapted for life in saturated soil conditions. The USACE also regulates the building of structures in waters of the U.S. pursuant to Section 10 of the Rivers and Harbors Act (RHA). Executive Order (EO) 11990, Protection of Wetlands, directs federal agencies to minimize the destruction, loss, or degradation of wetlands and to preserve and enhance the values of wetlands for federally funded projects. FEMA regulations for complying with EO 11990 are found at 44 CFR Part 9, Floodplain Management and Protection of Wetlands.

The U.S. Environmental Protection Agency (USEPA) regulates discharges to waters of the United States through permits issued under Section 402 of the CWA, entitled the National Pollutant Discharge Elimination System (NPDES), which authorizes and sets forth standards for state administered permitting programs regulating the discharge of pollutants into navigable waters within each state's jurisdiction. On August 27, 1996, USEPA Region VI delegated the authority to administer the NPDES program for matters within the jurisdiction of the State of Louisiana. Having assumed NPDES responsibilities, Louisiana directly issues NPDES permits and has primary enforcement responsibility for facilities located within the State, with certain exceptions such as Indian Country Lands. Louisiana administers the NPDES Program and surface water discharge permitting system under the Louisiana Pollutant Discharge Elimination System (LPDES) program.

The LPDES requires permits for the discharge of pollutants/wastewater from any point source into waters of the State. The term "point source" is defined as "any discernible, confined, and discrete conveyance such as a pipe or a ditch." Prior to assumption of the program, permittees were required to hold both a valid state and federal permit. Today, all point source discharges of pollutants to waters in the state of Louisiana are subject to a LPDES permit issued by the Louisiana Department of Environmental Quality (LDEQ). Additionally, the LDEQ requires a Stormwater Pollution Prevention Plan (SWPPP) for land disturbing activities greater than 1 acre. For land disturbing activities greater than 5 acres the LDEQ requires: 1) a SWPPP 2) a Notice of Intent and 3) a Notice of Completion.

Section 303(d) of the CWA requires states to develop a list of impaired waters. A water is considered impaired if the current water quality does not meet the numeric or narrative criteria in a water quality standard, or the designated use described by that state is not achieved. Section 303(d)(2) requires that states submit and USEPA approve or disapprove lists of waters for which existing technology-based pollution controls are not stringent enough to attain or maintain state water quality standards, and for which total maximum daily loads (TMDLs) must be prepared (40 CFR 130.7). Total maximum daily loads are pollution budgets designed to identify necessary reductions of pollutant loads to the impaired waters so that the appropriate water quality standards are met, including designated uses like fishing or swimming and water quality criteria for parameters such as dissolved oxygen and water clarity. The regulations require states to identify water quality limited waters still requiring TMDLs every two years. The lists of waters still needing TMDLs must also include priority rankings and must identify the waters targeted for TMDL development during the next two years (40 CFR 130.7). Types of impairments may include, for example, impaired primary contact use (e.g., swimming, water skiing), mercury and polychlorinated biphenyls (PCBs) in fish tissue, impaired fish consumption use, low dissolved oxygen, copper, phosphorus, manganese, excessive siltation, physical-habitat alterations, and total suspended solids which impair aquatic life use.

4.2.2 Existing Conditions

St. Tammany Parish contains approximately 279 sq mi of surface water. The Parish's main sources of surface water are the Tchefuncte River, Bogue Falaya River, Bayou Lacombe, Bayou Bonfouca, Liberty Bayou, Bogue Chitto River, Pearl River, and Lake Pontchartrain. Lake Pontchartrain and the numerous streams flowing into the lake are subject to daily tidal

fluctuations. The surface waters of Lake Pontchartrain and the lower reaches of streams that flow into the lake range from fresh to brackish, depending upon the season and the amount of rainfall received (USDA 1990).

Located within LDEQ Sub-watershed Segment 040907 (Bayou Bonfouca – from headwaters to LA-433), the proposed project site lies approximately 4.5 miles to the north of Lake Pontchartrain and just under 500 yards to the east of Bayou Bonfouca. According to the 2012 LDEQ Water Quality Inventory Integrated Report [Section 305(b) and 303(d) Reports], this watershed area fully supports the designated use of secondary contact recreation (boating), but does not fully support the designated uses of primary contact recreation (swimming) and fish and wildlife propagation. Unacceptable levels of Copper are the suspected cause of impairment. Currently, suspected sources for this impairment are unknown.

According to the U.S. Fish & Wildlife Service (USFWS) National Wetlands Inventory (NWI) map, the proposed project is not located in or adjacent to any designated wetlands. Furthermore, during a site visit, conducted on September 4, 2013, FEMA Environmental Specialists observed no wetlands areas at the proposed site.

4.2.3 Environmental Consequences

Alternative 1 – No Action

The No Action Alternative would include no undertaking, and, consequently, would have no impact on wetlands or waters of the U.S. and would not require permits under Section 404 of the CWA or Section 10 of the RHA.

Alternative 2 – Construction of Multi-Level Facility

This action alternative would have no impact on wetlands or other waters of the United States. FEMA has determined that the project location is an urban, previously disturbed site, and is not a wetland subject to Executive Order 11990. This alternative would not require a permit under Section 10 of the Rivers and Harbors Act. Correspondence from the USEPA, dated July 3, 2013, states that jurisdictional waters of the United States do not occur at the proposed project site. Correspondence from the USACE, dated September 16, 2013, states that the site is not a wetland subject to Corps' of Engineers jurisdiction, and that a Department of the Army permit under Section 404 of the Clean Water Act will not be required for the deposition or redistribution of dredged or fill material on this site (Appendix A).

If the project results in a discharge to waters of the State, a Louisiana Pollution Discharge Elimination System (LPDES) permit may be required in accordance with the Clean Water Act and the Louisiana Clean Water Code. If the project results in a discharge of wastewater to an existing wastewater treatment system, that wastewater treatment system may need to modify its LPDES permit before accepting the additional wastewater. 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 ensure compliance with all local, state, and federal requirements related to sediment control, disposal of solid waste, control and containment of spills, and discharge of

surface runoff and stormwater from the site. Accordingly, the contractor should implement Best Management Practices (BMPs) that meet the Louisiana Department of Environmental Quality's (LDEQ) permitting specifications for stormwater discharge regulated under Sections 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 placed where and as needed. Fencing should be placed for marking staging areas to store construction equipment and supplies as well as conduct maintenance/repair operations. Hazardous materials associated with construction equipment should be handled according to local, state, and federal regulations in order to minimize the risk of spills and leaks and subsequent impacts to surface and groundwater resources.

Alternative 4 – Consolidation of Education and Administration Building (Proposed Action)

The Proposed Action Alternative would have no impact on wetlands or other waters of the United States. FEMA has determined that the project location is an urban, previously disturbed site, and is not a wetland subject to Executive Order 11990. This alternative would not require permits under Section 10 of the Rivers and Harbors Act. Correspondence from the USEPA, dated July 3, 2013, states that jurisdictional waters of the United States do not occur at the proposed project site. Correspondence from the USACE, dated September 16, 2013, states that the site is not a wetland subject to Corps' of Engineers jurisdiction, and that a Department of the Army permit under Section 404 of the Clean Water Act will not be required for the deposition or redistribution of dredged or fill material on this site (Appendix A).

If the project results in a discharge to waters of the State, a Louisiana Pollution Discharge Elimination System (LPDES) permit may be required in accordance with the Clean Water Act and the Louisiana Clean Water Code. If the project results in a discharge of wastewater to an existing wastewater treatment system, that wastewater treatment system may need to modify its LPDES permit before accepting the additional wastewater. 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 ensure compliance with all local, state, and federal requirements related to sediment control, disposal of solid waste, control and containment of spills, and discharge of surface runoff and stormwater from the site. Accordingly, the contractor should implement Best Management Practices (BMPs) that meet the Louisiana Department of Environmental Quality's (LDEQ) permitting specifications for stormwater discharge regulated under Sections 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 placed where and as needed. Fencing should be placed for marking staging areas to store construction equipment and supplies as well as conduct maintenance/repair operations. Hazardous materials associated with construction equipment should be handled according to local, state, and federal regulations in order to minimize the risk of spills and leaks and subsequent impacts to surface and groundwater resources.

4.3 Floodplains

4.3.1 Regulatory Setting

Executive Order (EO) 11988, Floodplain Management, requires federal agencies to avoid direct or indirect support or development 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 the 0.2% annual chance SFHA, i.e., the 500-year floodplain). FEMA used the National Flood Insurance Program (NFIP) preliminary Flood Insurance Rate Maps (FIRM) to determine the flood hazard zone for the proposed project location. FEMA’s regulations for complying with EO 11988 are found in 44 CFR Part 9, Floodplain Management and Protection of Wetlands.

44 CFR Section 9.6 details an eight-step process that decision-makers must use when considering projects either located within the floodplain or with the potential to affect the floodplain. The 8-step process: assesses the action with regard to human susceptibility to flood harm and impacts to wetlands; analyzes principle flood problems, risks from flooding, history of flood loss, and existing flood protection measures; and 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 and determines their practicability as required by FEMA regulations. If impacts cannot be avoided, the 8-step process includes requirements to incorporate measures to minimize and mitigate potential risks from flooding and impacts to wetlands as appropriate.

4.3.2 Existing Conditions

St. Tammany Parish is subject to periodic flooding from a variety of sources. The low-lying areas within approximately 5 miles of Lake Pontchartrain can be flooded by intense rainfall, abnormally high tides in Lake Pontchartrain, hurricanes or lesser tropical storms, or any combination of these events. In the areas not adjacent to Lake Pontchartrain, flooding would result from periodic intense rainfall causing overflow of rivers and streams.

Numerous state and local channel improvements have been made in the Parish during the last 60 years. Most improvements were made on streams in and near the populated areas of Slidell, Covington, and Lacombe. A ring levee providing 1%- annual-chance flood protection is located just south of Voters Road, or approximately 2.2 miles southwest of the proposed project site. The remaining areas in St. Tammany Parish that are leveed do not have sufficiently high levee or barrier protection to prevent inundation by a 1%-annual-chance flood event. Their primary function is to protect against high tides and low-frequency hurricane flooding from Lake Pontchartrain (FEMA 2008b).

Flooding in the city of Slidell and vicinity is relatively frequent. The City is subject to both headwater flooding due to intense rainfall in the upper reaches of the streams and flooding resulting from high stages in Lake Pontchartrain caused by hurricanes. The principal causes of flooding are the inadequacy of the existing channel system to convey the storm runoff, relatively low flat floodplain areas which are easily inundated, and high stages in Lake Pontchartrain

caused by hurricanes. The flooding problem in Slidell is compounded when high lake stages are accompanied by intense rainfall (FEMA 2008b).

During an initial post-hurricane (i.e. Hurricanes Katrina and Rita) analysis, FEMA determined that the “100-Year” or 1-percent chance storm flood elevations on FIRMs for many Louisiana communities, referred to as Base Flood Elevations (BFEs), 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 (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). The ABFE maps were released for St. Tammany Parish on January 18, 2006. Per ABFE Map Panel LA-MM41, the proposed project site is located in an ABFE (Elevation 10 feet) Zone.

The preliminary Digital Flood Insurance Rate Maps (DFIRMs) for St. Tammany Parish, dated April 30, 2008, are currently considered the best available flood risk data for the project area. Even if not officially adopted by a community, best available floodplain data identifies the minimum elevation and reconstruction requirements for FEMA grants. Per Preliminary DFIRM Panel 22103C 0495E, the proposed project site is located in AE (Elevation 11 feet) zone.

In compliance with FEMA policy implementing EO 11988, Floodplain Management, the proposed project was reviewed for possible impacts associated with occupancy or modification to floodplain. St. Tammany Parish enrolled in NFIP on April 23, 1971.

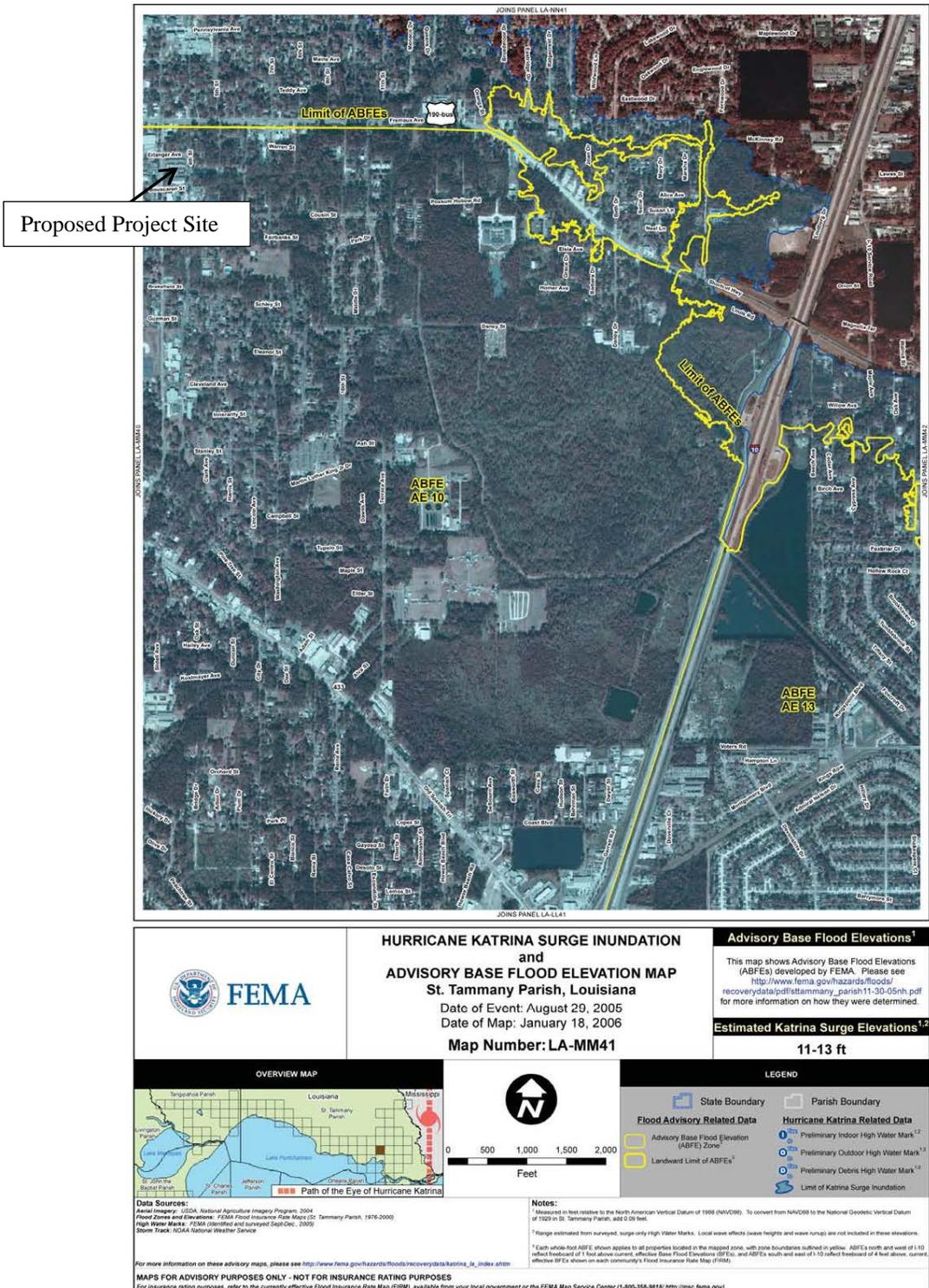


Figure 12 – ABFE Map LA-MM41, Dated January 18, 2006 (LSU 2013)

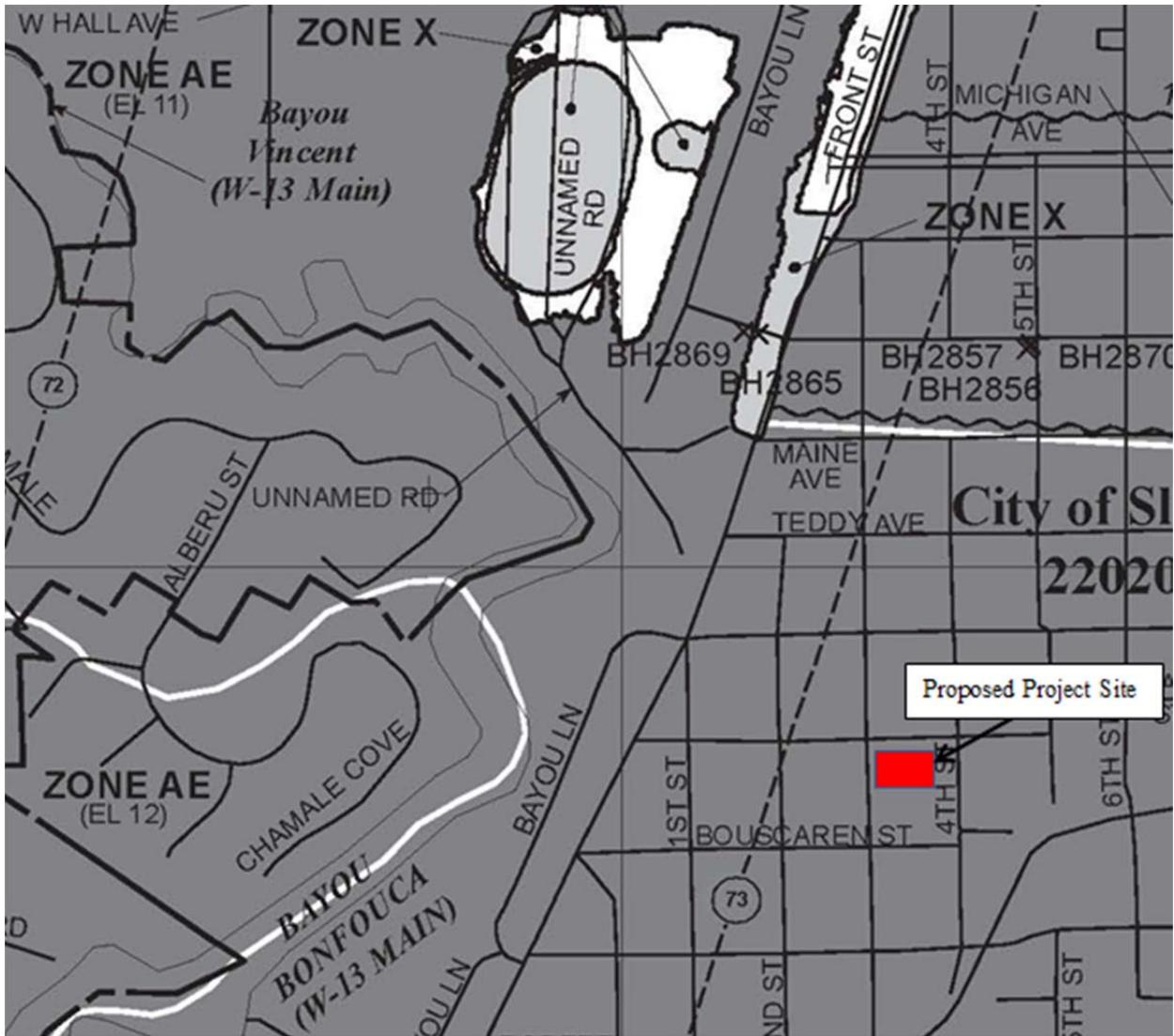


Figure 13 – St. Tammany Parish Preliminary DFIRM Panel Number 22103C 0495F, Dated April 30, 2008

4.3.3 Environmental Consequences

Alternative 1 – No Action

The No Action Alternative would involve no undertaking and would not result in any adverse impacts to the base floodplain.

Alternative 2 – Construction of Multi-Level Facility

This action alternative includes the construction of an expanded facility in the base floodplain. Per 44 CFR 9.11(d)(3), there shall be no new construction or substantial improvement of structures unless the lowest floor of the structures (including basement) is at or above the level of the base flood. Furthermore, per 44 CFR 9.11(d)(6), 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. The Applicant is required to coordinate with the local floodplain administrator regarding floodplain permit(s) prior to the start of any activities. All documentation pertaining to these activities and Applicant compliance with any conditions should be forwarded to the LA GOHSEP and FEMA for inclusion in the permanent project files. Per 44 CFR 9.11(d)(9), for the replacement of building contents, materials and equipment, where possible, disaster-proofing of the building and/or elimination of such future losses should occur by relocation of those building contents, materials and equipment outside or above the base floodplain. In compliance with Executive Order 11988, an 8-step process was completed, is attached and on file (Appendix B.)

Alternative 4 - Consolidation of Education and Administration Building (Proposed Action)

The Proposed Action Alternative would expand a facility located in the base floodplain approximately 4,000 square feet, and, additionally, would also include renovations to the same facility. Per 44 CFR 9.11(d)(3), there shall be no new construction or substantial improvement of structures unless the lowest floor of the structures (including basement) is at or above the level of the base flood. Furthermore, per 44 CFR 9.11(d)(6), 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. The Applicant is required to coordinate with the local floodplain administrator regarding floodplain permit(s) prior to the start of any activities. All documentation pertaining to these activities and Applicant compliance with any conditions should be forwarded to the LA GOHSEP and FEMA for inclusion in the permanent project files. Per 44 CFR 9.11(d)(9), for the replacement of building contents, materials and equipment, where possible, disaster-proofing of the building and/or elimination of such future losses should occur by relocation of those building contents, materials and equipment outside or above the base floodplain. In compliance with Executive Order 11988, an 8-step process was completed, is attached and on file (Appendix B).

4.4 Coastal Resources

4.4.1 Regulatory Setting

The Coastal Zone Management Act of 1972 (CZMA) encourages the management of coastal zone areas and provides grants to be used in maintaining coastal zone areas. It requires that federal agencies be consistent in enforcing the policies of state coastal zone management programs when conducting or supporting activities that affect a coastal zone. It is intended to ensure that federal activities are consistent with state programs for the protection and, where, possible, enhancement of the nation's coastal zones.

The CZMA's definition of a coastal zone includes coastal waters extending to the outer limit of state submerged land title and ownership, adjacent shorelines, and land extending inward to the extent necessary to control shorelines. A coastal zone includes islands, beaches, transitional and intertidal areas, and salt marshes. The CZMA requires that states develop a State Coastal Zone Management Plan or program and that any federal agency conducting or supporting activities affecting the coastal zone conduct or support those activities in a manner consistent with the approved state plan or program. The Louisiana Department of Natural Resources (LDNR) regulates development in Louisiana's designated coastal zone through the Coastal Use Permit (CUP) Program.

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 [OPAs]) by prohibiting direct or indirect Federal funding of projects that support development in these areas. The Act promotes appropriate use and conservation of coastal barriers along the Gulf of Mexico.

4.4.2 Existing Conditions

The proposed project site is in St. Tammany Parish, which is partially located in the Louisiana Coastal Zone. Correspondence from the LDNR's Office of Coastal Management (OCM), dated June 25, 2013, confirms that the proposed project site is located within the Louisiana Coastal Zone (Appendix A; Figure 14).



Figure 14 – Louisiana Coastal Zone Boundary Map (LDNR 2013)

4.4.3 Environmental Consequences

Alternative 1 - No Action

The No Action Alternative would entail no undertaking and, therefore, would have no adverse impacts related to the designated coastal management zone or to a CBRS unit.

Alternative 2 – Construction of Multi-Level Facility

This action alternative would involve construction activities within the Louisiana Coastal Management Zone. Accordingly, the Applicant would be responsible for coordinating with and obtaining any required permit(s) from the Louisiana Department of Natural Resources’ (LDNR) Coastal Management Division (CMD) prior to initiating work. All documentation pertaining to these activities and Applicant compliance with any conditions should be forwarded to the State and FEMA for inclusion in the permanent project files.

The site is not within a CBRS unit and, therefore, not subject to the CBRA.

Alternative 4 - Consolidation of Education and Administration Building (Proposed Action)

Correspondence from the LDNR's Office of Coastal Management (OCM), dated June 25, 2013, states that Proposed Action Alternative, if implemented, would require the Applicant to complete a CUP Application. The Applicant is responsible for coordinating with and obtaining any required CUPs or other authorizations from LDNR-OCM's Permits and Mitigation Division prior to initiating work.

The site is not within a CBRS unit and, therefore, not subject to the CBRA.

4.5 Federally Protected Species and Critical Habitats

4.5.1 Regulatory Setting

The Endangered Species Act of 1973 (16 U.S.C. 1531-1543; 87 Stat. 884)(ESA) prohibits the taking of listed, threatened, and endangered species unless specifically authorized by permit from the USFWS or the National Marine Fisheries Service. "Take" is defined in 16 U.S.C. 1532 (19) as "*to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect or attempt to engage in any such conduct.*" Harm is further defined to include significant habitat modification or degradation that results in death or injury to listed species by significantly impairing behavioral patterns such as breeding, feeding, or sheltering (50 CFR 17.3). Section 7(a)(2) of the ESA requires the lead federal government agency to consult with either the USFWS or the NMFS, depending which agency has jurisdiction over the federally listed species in question, when a federally funded project may have the potential to adversely affect a federally listed species or a federal action occurs within or may have the potential to impact designated critical habitat. The ESA defines critical habitat as "the specific areas within the geographical area occupied by the species, at the time it is listed, on which are found those physical or biological features (I) essential to the conservation of the species and (II) which may require special management considerations or protection; and specific areas outside the geographical area occupied by the species at the time it is listed that are determined by the Secretary to be essential for the conservation of the species."

4.5.2 Existing Conditions

According to the USFWS, Information, Planning, and Conservation (IPaC) online system, accessed on July 8, 2013, a total of eight threatened, endangered, or candidate species, and/or designated critical habitat, federally listed by the U.S. Fish and Wildlife Service (USFWS) are known to occur in St. Tammany Parish (Table 2) (USFWS, IPaC, 2013). A site visit conducted on September 4, 2013, confirmed that the proposed project site is located within a previously disturbed urban area. No listed species or critical habitats were identified present. The proposed project site is located within the Louisiana Flyway (USFWS 2013).

| Common Name | Scientific Name | Federal Status | Critical Habitat | Habitat Requirements |
|-------------------------|---------------------------------------|----------------|------------------|--|
| Red-Cockaded woodpecker | <i>(Picoides borealis)</i> | Endangered | No | Makes its home in mature pine forests. Longleaf pines (<i>Pinus palustris</i>) are most commonly preferred, but other species of southern pine are also acceptable. |
| Sprague's Pipit | <i>(Anthus spragueii)</i> | Candidate | No | Grassland bird that overwinters during its non-breeding season from western Louisiana to Mexico and southwestern states. |
| Alabama heelsplitter | <i>(Potamilus inflatus)</i> | Threatened | No | Preferred habitat is soft, stable substrata in slow to moderate currents. This species has been found in sand, mud, silt and sandy-gravel, but not in large or armored gravel. |
| Gulf sturgeon | <i>(Acipenser oxyrinchus desotoi)</i> | Threatened | Yes | Anadromous fish species that spends most of its life in freshwater habitats and spawns in estuarine bays. Found in a variety of substrate areas based on age class of species. |
| West Indian Manatee | <i>(Trichechus manatus)</i> | Endangered | Yes | Found in marine, estuarine, and freshwater environments with a strong preference for warm and well vegetated waters. |

| Common Name | Scientific Name | Federal Status | Critical Habitat | Habitat Requirements |
|-------------------|------------------------------|----------------|------------------|--|
| Gopher tortoise | <i>(Gopherus polyphemus)</i> | Threatened | No | Occupies a wide range of upland habitat types. Most suitable habitats include: a presence of well-drained, sandy soils; an abundance of herbaceous ground cover; and a generally open canopy and sparse shrub cover. |
| Ringed Map turtle | <i>(Graptemys oculifera)</i> | Threatened | No | Prefers wide rivers with strong currents, adjacent white sand beaches, and an abundance of basking sites in the form of brush logs, and debris. |

Table 2 - Federally Listed Species Known to Occur in St. Tammany Parish
Data Accessed 07/8/2013 from USFWS IPaC Web Portal (<http://ecos.fws.gov/ipac/>)

4.5.3 Environmental Consequences

Alternative 1 – No Action:

The No Action Alternative would entail no undertaking and, therefore, would have no adverse impacts on species federally listed as threatened or endangered.

Alternative 2 – Construction of Multi-Level Facility

The proposed project site is located within a previously disturbed area. Additionally, FEMA Environmental Specialists identified no listed species or critical habitat during a site visit conducted at the proposed project site. Consequently, given the scope of work, it is anticipated that this action alternative would have no impacts on species federally listed as threatened or endangered, migratory birds, or federally listed critically habitats.

Alternative 4 - Consolidation of Education and Administration Building (Proposed Action)

The Proposed Action Alternative has been reviewed by the USFWS for effects to federal trust resources under their jurisdiction and currently protected by the Endangered Species Act of 1973. Correspondence from the Louisiana Department of Wildlife and Fisheries

(LDWF), dated June 27, 2013, states that the Agency anticipates no impacts to rare, threatened, or endangered species or critical habitats for the proposed project. Additionally, correspondence from the USFWS, dated June 26, 2013, states that the proposed project would have no effect on federal trust resources under its jurisdiction and currently protected by the ESA (Appendix A).

4.6 Air Quality

4.6.1 Regulatory Setting

The Clean Air Act (CAA) of 1963, as amended, provides for federal protection of air quality by regulating air pollutant sources and setting emissions standards for certain air pollutants. Under CAA, states adopt ambient air quality standards in order to protect the public from potentially harmful amounts of pollutants. The USEPA establishes primary and secondary air quality standards. Primary air quality standards protect the public health, including the health of “sensitive populations, such as people with asthma, children, and older adults.” Secondary air quality standards protect the public welfare by promoting ecosystems health, and preventing decreased visibility and damage to crops and buildings. The USEPA has set National Ambient Air Quality Standards (NAAQS) for the following six criteria pollutants: ozone (O₃), particulate matter (PM_{2.5}, PM₁₀), nitrogen dioxide (NO₂), carbon monoxide (CO), sulfur dioxide (SO₂), and lead (Pb).

The USEPA has designated specific areas as NAAQS attainment or non-attainment areas. Non-attainment areas are any areas that do not meet the quality standard for a pollutant, while attainment areas do meet ambient air quality standards.

4.6.2 Existing Conditions

Correspondence from the LDEQ, dated July 17, 2013, states that St. Tammany Parish is currently classified by the USEPA as an attainment area and has no general conformity determination obligations (Appendix A).

4.6.3 Environmental Consequences

Alternative 1 – No Action

The No Action Alternative would involve no undertaking and, therefore, would cause no short or long term impacts to air quality.

Alternative 2 – Construction of Multi-Level Facility

This action alternative potentially includes short-term impacts to air quality that could occur during excavation and construction. Particulate emissions from the generation of fugitive dust during project excavation and construction would be increased temporarily in the immediate project area as a result of this alternative. Other emission sources on site would be internal combustion engines and heavy construction equipment. These effects would be localized and of short duration.

To reduce potential short term effects to air quality from construction related activities, the contractor should be responsible for using BMPs to reduce fugitive dust generation and diesel emissions. The contractor would be required to water down construction areas when necessary to minimize particulate matter and dust. Emissions from fuel-burning internal combustion engines (*e.g.*, heavy equipment and earthmoving machinery) could temporarily increase the levels of some of the criteria pollutants, including CO, NO₂, O₃, and PM₁₀, and non-criteria pollutants such as volatile organic compounds. To reduce emission criteria pollutants, fuel-burning equipment running times would be kept at a minimum and engines would be properly maintained.

Alternative 4 - Consolidation of Education and Administration Building (Proposed Action)

The Proposed Action Alternative potentially includes short-term impacts to air quality that could occur during excavation and construction. Particulate emissions from the generation of fugitive dust during project excavation and construction would be increased temporarily in the immediate project area as a result of this alternative. Other emission sources on site would be internal combustion engines and heavy construction equipment. These effects would be localized and of short duration.

To reduce potential short term effects to air quality from construction related activities, the contractor should be responsible for using BMPs to reduce fugitive dust generation and diesel emissions. The contractor would be required to water down construction areas when necessary to minimize particulate matter and dust. Emissions from fuel-burning internal combustion engines (*e.g.*, heavy equipment and earthmoving machinery) could temporarily increase the levels of some of the criteria pollutants, including CO, NO₂, O₃, and PM₁₀, and non-criteria pollutants such as volatile organic compounds. To reduce emission criteria pollutants, fuel-burning equipment running times would be kept at a minimum and engines would be properly maintained.

4.7 Noise

4.7.1 Regulatory Setting

Noise is commonly defined as unwanted or unwelcome sound, and most commonly measured in decibels (dB) on the A-weighted scale (i.e. the scale most similar to the range of sounds that the human ear can hear). The Day-Night Average Sound Level (DNL) is an average measure of sound. The DNL descriptor is accepted by federal agencies as a standard for estimating sound impacts and establishing guidelines for compatible land uses. Sound is federally regulated by the Noise Control Act of 1972, which charges the USEPA with preparing guidelines for acceptable ambient noise levels. USEPA guidelines, and those of many other federal agencies, state that outdoor sound levels in excess of 55 dB DNL are “normally unacceptable” for noise-sensitive land uses including residences, schools, or hospitals (USEPA 1974). The Noise Control Act, however, only charges implementation of noise standards to those federal agencies that operate noise-producing facilities or equipment.

St. Tammany Parish Ordinance places certain restrictions on any machinery, equipment or device that makes or causes a noise. The proposed project site is located in a municipalities zoning district. For these areas, noise that exceeds 65 decibels is not allowed from 7 a.m. to 9 p.m. on weekdays (Monday-Thursday) and 8 a.m. to 10 p.m. on weekends (Friday-Sunday). Noise that exceeds 60 decibels is not allowed between 9 p.m. to 7 a.m. on weekdays and 10 p.m. to 8 a.m. on weekends. Construction activity and general maintenance shall be exempt from daytime decibel restrictions but the maximum nighttime sound level shall apply in all instances (St. Tammany Parish 2013).

4.7.2 Existing Conditions

The FUMC is a 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 mainly commercial development.

4.7.3 Environmental Consequences

Alternative 1 – No Action

Under the No Action Alternative there would be no short or long term impact to noise levels because no construction would occur.

Alternative 2 – Construction of Multi-Level Facility

Under this action alternative, construction activities would result in short-term increases in noise during the reconstruction/reconfiguration period. Equipment and machinery utilized on the project site would meet all local, state, and federal noise regulations. Additionally, the contractor should coordinate with the Applicant so as to minimize the potential disruption of any school activities to the extent possible. Following the completion of construction activities, operations at the proposed expanded facility would not result in any significant permanent increases in noise levels.

Alternative 4 - Consolidation of Education and Administration Building (Proposed Action)

Under the Proposed Action Alternative, construction activities would result in short-term increases in noise during the reconstruction/reconfiguration period. Equipment and machinery utilized on the project site would meet all local, state, and federal noise regulations. Additionally, the contractor should coordinate with the Applicant so as to minimize the potential disruption of any school activities to the extent possible. Following the completion of construction activities, operations at the proposed expanded facility would not result in any significant permanent increases in noise levels.

4.8 Traffic

4.8.1 Regulatory Setting

The Louisiana Department of Transportation and Development (LADOTD) is responsible for maintaining public transportation state highways, interstate highways under state jurisdiction, and bridges located within the State of Louisiana. These duties include the planning, design, and building of new highways in addition to the maintenance and upgrading of current highways.

Roads not part of any highway system usually fall under the jurisdiction of and are maintained by applicable, local government entities. However, the LADOTD is responsible for assuring all local agency Federal-aid projects comply with all applicable federal and state requirements (LADOTD 2007).

4.8.2 Existing Conditions

The proposed project site is bounded to north by Erlanger Avenue; to the east by 4th Street; and to the south by Bouscaren Street. All of these are two-way roads and consists of two 12' lanes with no shoulder. The proposed project site is bounded to the south by 3rd Street/ Sergeant Alfred Drive, which is a fairly busy road and consists of three 12' lanes (one lane dedicated for traffic flow in each direction with a 12' center turning lane) with no shoulder. The FUMC's parking lot and current drop off area for students are both located off Erlanger Avenue.

4.8.3 Environmental Consequences

Alternative 1 – No Action

Implementation of the No Action Alternative would not adversely affect the site traffic patterns as no construction would occur.

Alternative 2 – Construction of Multi-Level Facility

Under this action alternative, a temporary increase in construction related traffic during building of the facilities is anticipated. Additionally, this action alternative would expand the FUMC's current educative and administrative capabilities. Consequently, construction of a new multi-level facility at the proposed project site could minimally affect traffic levels by increasing the numbers of visitors and vehicles traveling to and from the site daily.

During construction the contractor would take all reasonable precautions to control site access. All activities would be conducted in a safe manner in accordance with OSHA work zone traffic safety requirements. The contractor would post appropriate signage and fencing to minimize foreseeable potential public safety concerns. Appropriate signage and barriers would be in place prior to construction activities in order to alert pedestrians and motorists of project activities and traffic pattern changes (detours/lanes dedicated for construction equipment egress). Upon completion of the proposed action, there would be minimal long-term effect on the current traffic patterns.

Alternative 4 - Consolidation of Education and Administration Building (Proposed Action)

Under the Proposed Action Alternative, there is anticipated to be a temporary increase in construction related traffic during building of the facilities. Furthermore, the proposed action would expand the damaged facility's educative and administrative capabilities by a factor of approximately 28% and includes the installation of a new driveway entrance along 3rd Street/Sergeant Alfred drive. Consequently, construction of the Proposed Action alternative could minimally affect travel levels by increasing the numbers of visitors and vehicles traveling to and from the site daily.

During construction the contractor would take all reasonable precautions to control site access. All activities would be conducted in a safe manner in accordance with OSHA work zone traffic safety requirements. The contractor would post appropriate signage and fencing to minimize foreseeable potential public safety concerns. Appropriate signage and barriers would be in place prior to construction activities in order to alert pedestrians and motorists of project activities and traffic pattern changes (detours/lanes dedicated for construction equipment egress). Upon completion of the proposed action, there would be minimal long-term effect on the current traffic patterns.

4.9 Environmental Justice

4.9.1 Regulatory Setting

Executive Order 12898, entitled "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," was signed on February 11, 1994. The Executive Order directs federal agencies to make achieving environmental justice part of their missions by identifying and addressing, as appropriate, disproportionately high adverse human health, environmental, economic, and social effects of its programs, policies and activities on minority or low-income populations.

4.9.2 Existing Conditions

Socioeconomic and demographic data for the project area was reviewed to determine if the proposed action would have a disproportionate adverse impact on minority or low-income persons. According to the 2010 U.S. Census, the population of zip code 70458 is: 82.2% White; 14.3% Black or African American; 5.3% Hispanic; and 2.1% Asian. The median household income for zip code 70458 is \$54,604, and 10.2% of families earn below the poverty level.

4.9.3 Environmental Consequences

Alternative 1 – No Action

Under the No Action Alternative no construction activities would occur and there would be no disproportionately high or adverse impacts on minority or low-income populations.

Alternative 2 – Construction of Multi-Level Facility

This action alternative would have no disproportionate adverse human health, economic, or social effects on minority or low-income populations. The project would increase the Applicant's pre-Katrina administrative and educative capabilities. Consequently, the proposed action would benefit the local population as a whole as the expansion would provide services available to all without regard to race, color, or national origin.

Alternative 4 - Consolidation of Education and Administration Building (Proposed Action)

The Proposed Action Alternative would have no disproportionate adverse human health, economic, or social effects on minority or low-income populations. The project would increase the Applicant's pre-Katrina administrative and educative capabilities. Consequently, the proposed action would benefit the local population as a whole as the expansion would provide services available to all without regard to race, color, or national origin.

4.10 Hazardous Materials

4.10.1. Regulatory Setting

The management of hazardous materials is regulated under various federal and state environmental and transportation laws and regulations, including the Resource Conservation and Recovery Act (RCRA); the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA); the Toxic Substances Control Act of 1976 (TSCA); the Emergency Planning and Community Right-to-Know Act; the Hazardous Materials Transportation Act; and the Louisiana Voluntary Investigation and Remedial Action statute. The purpose of the regulatory requirements set forth under these laws is to ensure the protection of human health and the environment through proper management (identification, use, storage, treatment, transport, and disposal) of these materials. Some of these laws provide for the investigation and cleanup of sites already contaminated by releases of hazardous materials, wastes, or substances.

The TSCA (codified at 15 U.S.C., Ch. 53), authorizes the USEPA to protect the public from “unreasonable risk of injury to health or the environment” by regulating the introduction, manufacture, importation, sale, use and disposal of specific new or already existing chemicals. “New Chemicals” are defined as “any chemical substance which is not included in the chemical substance list compiled and published under [TSCA] Section 8(b).” Existing chemicals include any chemical currently listed under Section 8(b), including polychlorinated biphenyls (PCBs), asbestos, radon, lead-based paint, chlorofluorocarbons, dioxin and hexavalent chromium.

TSCA Subchapter I, “Control of Toxic Substances” (Sections 2601-2629), regulates the disposal of PCB products, sets limits for PCB contamination of the environment, and authorizes the remediation of sites contaminated with PCB. Subchapter II, “Asbestos Hazard Emergency Response” (Sections 2641-2656), authorizes the USEPA to impose requirements for asbestos abatement in schools, and requires accreditation of those who inspect asbestos-containing

materials. Subchapter IV, “Lead Exposure Reduction” (Sections 2681-2692), requires the USEPA to identify sources of lead contamination in the environment, to regulate the amounts of lead allowed in products, and to establish state programs that monitor and reduce lead exposure.

4.10.2 Existing Conditions

A review of multiple data sources (e.g. USEPA EnviroMapper and the LDEQ Electronic Document Management System™) revealed that the proposed project site is not identified on a federal and/or state agency’s list concerning voluntary remediation, brownfield, underground storage tank decommission, waste/debris disposal facilities, or oil/gas wells sites. Additionally, there are no obvious sites of concern in the vicinity of proposed project area (USEPA 2012).

4.10.3 Environmental Consequences

Alternative 1 – No Action

Implementation of the No Action Alternative would not disturb any hazardous materials or create potential hazards to human health related to hazardous material because no construction would occur.

Alternative 2 – Construction of Multi-Level Facility

This action alternative would not disturb any subsurface hazardous materials or increase 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 4 - Consolidation of Education and Administration Building (Proposed Action)

Under the Proposed Action Alternative, the construction of an expanded facility at the proposed project site would not disturb any subsurface hazardous materials or increase potential hazards to human health. The 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. See conditions.

4.11 Cultural Resources

4.11.1 Regulatory Setting

The consideration of impacts to historic and cultural resources is mandated under Section 101(b) 4 of the National Environmental Policy Act (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 (LA GOHSEP), 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.

4.11.2 Existing Conditions

FEMA Historic Preservation staff consulted the National Register of Historic Places (NRHP) Database, and the Louisiana Cultural Resources Map on May 22, 2013 and determined that the APEs are not located within a listed or eligible historic district. FEMA examined the First United Methodist Church of Slidell’s potential for listing in the NRHP, and determined that it is not eligible for listing in the NRHP due to lack of significance. Table 1 summarizes FEMA’s NRHP eligibility determinations for all properties within the APE.

| Property Name or Address | Construction Date | FEMA’s Determination of NRHP Eligibility |
|--|-------------------|--|
| First United Methodist Church of Slidell | 1962 to 1982 | Not eligible for the NRHP. Lacks significance. |

Table 3 – Summary of FEMA’s NRHP Eligibility Determinations

Upon consultation of data provided by SHPO on August 27, 2013, there are five recorded archaeological sites within one mile of the archaeological APE: 16ST145, 16ST152, 16ST205, 16ST225, and 16ST228. Site 16ST145 is Our Lady of Lourdes Cemetery with archaeological deposits dating from the 1890s. Site 16ST152 was the Salmen Brick Factory, dating to 1886, which was mitigated in 2001. Site 16ST205 and 16ST225 are early 20th century domestic sites. Site 16ST228 was Our Lady of Lourdes Catholic Church, but the site has been completely destroyed and is ineligible for inclusion on the NRHP. The other three sites are not evaluated. All of the sites are outside of the archaeological APE, and will not be affected by the current Undertaking.

On the 1926 Sanborn Fire Insurance map, the 1930 Sanborn Fire Insurance map, and the 1930-1945 Sanborn Fire Insurance map, the APE is depicted as a platted, undeveloped block. The 1950 USGS Slidell quad has the APE overlying an undeveloped section of town. The church, built in 1962, was the first historic construction within the APE. There is no archaeological resource Probability Zone information for this location. The soils are Stough fine sandy loam. On September 4, 2013, a FEMA archaeologist conducted a site visit. The archaeological APE is all within previously disturbed ground, within the courtyard and front area of Fellowship Hall with drainage pipes throughout the APE. No archaeological material was identified within the archaeological APE. Based on all the available evidence, it is unlikely that intact NRHP-eligible archaeological deposits would be uncovered within the APE.

4.11.3 Environmental Consequences

Alternative 1 – No Action

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

Alternative 2 – Construction of Multi-Level Facility

Based on research using the NRHP database, and the Louisiana Cultural Resources Map on the Louisiana Division of Historic Preservation's website, FEMA has determined that the project area is not located within a listed National Register Historic District. While ground disturbance for this activity would have "No Effect" to archaeological resources per SHPO concurrence on September 19, 2013; FEMA could not determine whether the proposed alternative would be located within the viewshed of eligible properties, due to the lack of information regarding height of the proposed structure. In order to fulfill obligations under Section 106 of the NHPA, and in accordance with the PA, a cultural resources review would need to be conducted. The height and configuration of the proposed building would need to be known in order to determine the Areas of Potential Effects (APEs) for standing structures.

Alternative 4 – Consolidation of Education and Administration Building (Proposed Action)

FEMA determined that the undertaking would have "No Effect" to Historic Properties. SHPO concurred with this determination on September 19, 2013. Consultation with affected tribes (Alabama-Coushatta Tribe of Texas, Choctaw Nation of Oklahoma, Coushatta Tribe of

Louisiana, Jena Band of Choctaw Indians, Mississippi Band of Choctaw Indians, and Tunica-Biloxi Tribe of Louisiana) was conducted per the PA and 36 CFR part 800.2(c)(2)(i)(B). The Tribes did not object within the regulatory timeframes. In accordance with Stipulation VIII.E(1) of the PA and 36 CFR part 800.5(c)1, FEMA may proceed with funding the undertaking assuming concurrence. The Applicant must comply with the NHPA conditions set forth in this EA (Louisiana Unmarked Human Burial Sites Preservation Act and Inadvertent Discovery Clause).

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. Section 1508.7).

In its comprehensive guidance on cumulative impacts analysis under NEPA, the CEQ notes that: "the 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. Section 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).

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 433 Erlanger Avenue is located in Slidell, LA, within the 70458 zip code geographic area (Figure 15). 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.

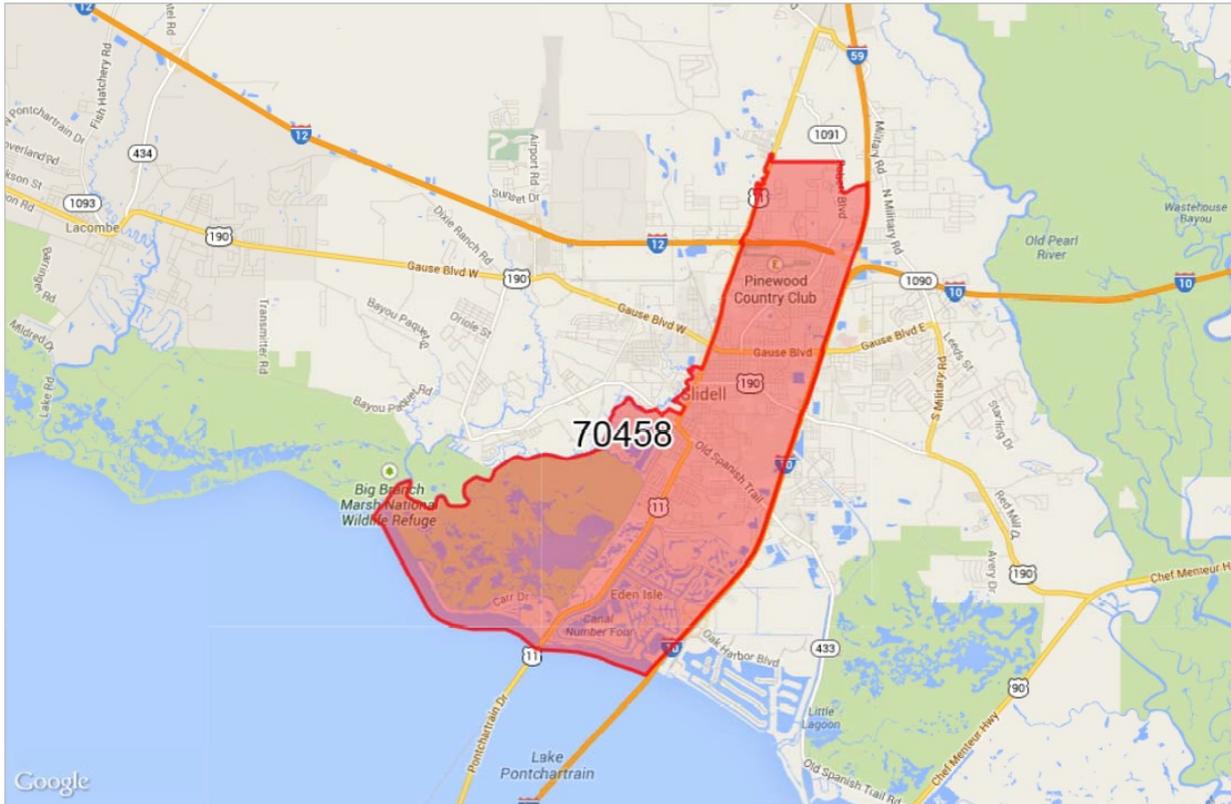


Figure 15 – Boundary Map for the 70458 Zip Code Geographic Area (Map Technica 2013)

In accordance with NEPA, and to the extent reasonable and practicable, this 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 455 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 16). 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.

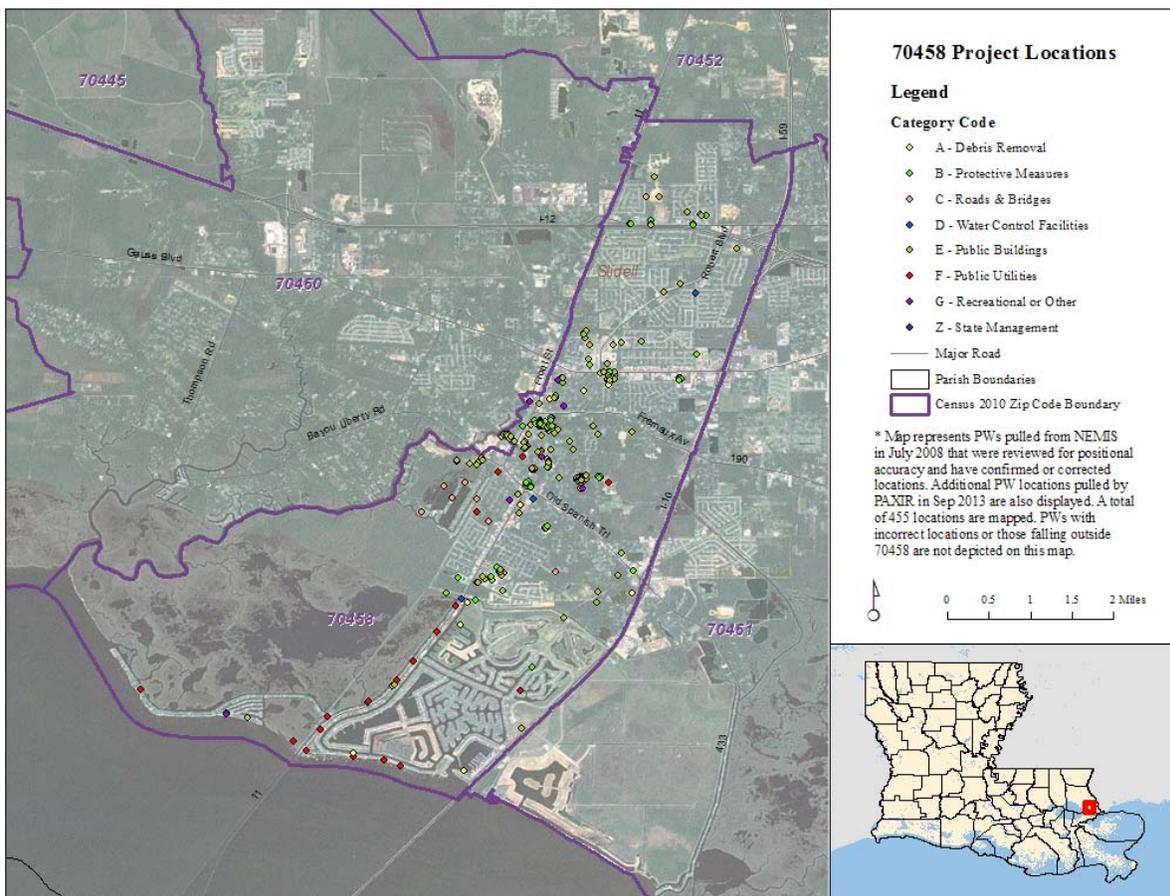


Figure 16– FEMA-Funded Projects Occurring Within the 70458 Zip Code (ESRI 2013)

Table 4 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 for which environmental assessments were performed, and or that may have the potential for cumulative impacts when combined with the effects of the present proposed action. The table also identifies the potential for cumulative impacts, and the rationale for that assessment.

| Project Name / Status | Lead Agency | Location | Description | Cumulative Impacts | Rationale |
|---|---|--|--|---------------------------|---|
| SELA St. Tammany Parish, W-14 Canal Drainage Improvements | USACE | Portion of W-14 Main Diversion Canal drainage basin that lies within the City of Slidell | The project includes improving approximately 4.1 miles of the existing W-14 Canal by widening the existing canal and lowering its existing invert elevation to improve flood flow capacity, excavating two new detention ponds with overflow weirs, expanding an existing pond, installing culverts, replacing three bridges, and constructing a new pump station. | Less than significant. | Project is pending Congressional funding/approval. Expected impacts to resources would be significantly different from those expected to be affected by the proposed action and alternatives, and overall are expected to be beneficial. Furthermore, any adverse effects to similar resources would be minimal and temporary. |
| Slidell Ring Levee | Coastal Protection Restoration Authority (CPRA) | City of Slidell | Construction of a ring levee to an elevation of 16.0 feet around Slidell for hurricane storm surge risk reduction. Project features include approximately 20,000 feet of earthen levee and 16,000 feet of concrete T-wall. | Less than significant | Project was included in CPRA's 2012 Coastal Master Plan which was approved by the State Legislature on May 22, 2012. Project implementation is expected to occur between 2012-2031. Expected impacts to resources would be significantly different from those expected to be affected by the proposed action and alternatives, and overall are expected to be beneficial. Furthermore, any adverse effects to similar resources would be minimal and temporary. |

| Project Name / Status | Lead Agency | Location | Description | Cumulative Impacts | Rationale |
|-------------------------------|--|--|---|-----------------------|--|
| Lake Pontchartrain Barrier | Coastal Protection Restoration Authority (CPRA) | New Orleans landbridge to Interstate 59 north of Slidell | Planning, engineering and design to construct a levee to an elevation of 24.5 feet across the mouth of Lake Pontchartrain from the New Orleans Landbridge to Interstate 59 north of Slidell for hurricane storm surge risk reduction. | Less than significant | Project was included in CPRA's 2012 Coastal Master Plan which was approved by the State Legislature on May 22, 2012. Project implementation is expected to occur between 2012-2031. Project currently consists of planning and design activities only. Expected impacts to resources would be significantly different from those expected to be affected by the proposed action and alternatives, and overall are expected to be beneficial. Furthermore, any adverse effects to similar resources would be minimal and temporary. |
| Bayou Bonfouca Marsh Creation | Louisiana Coastal Wetlands Conservation and Restoration Task Force | Pontchartrain Basin (area where Bayou Bonfouca and Lake Pontchartrain connect) | The primary goal of the project is to create 533 acres and nourish 42 acres of low salinity brackish marsh in open water areas adjacent to Bayou Bonfouca with sediment pumped from Lake Pontchartrain. | No impacts | Phase 1 funding approval for engineering and design was given by the Task Force in January 2011. Affected resources are significantly different from those in proposed action and alternatives, and overall expected to be beneficial investment to resources. |

Table 4 – Projects that May Have the Potential to Contribute to 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 impacts to affected resources are expected to be beneficial, non-existent, minimal, or 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. Therefore, 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

Based upon the studies, reviews and consultations undertaken in this environmental assessment, 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.
- Applicant shall comply with all local, state, and federal requirements related to sediment control, disposal of solid waste, control and containment of spills, and discharge of surface runoff and stormwater from the site.
- If the project results in a discharge to waters of the State, a Louisiana Pollution Discharge Elimination System (LPDES) permit may be required in accordance with the Clean Water Act and the Louisiana Clean Water Code. If the project results in a discharge of wastewater to an existing wastewater treatment system, that wastewater treatment system may need to modify its LPDES permit before accepting the additional wastewater. 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 contractor should ensure compliance with all local, state, and federal requirements related to sediment control, disposal of solid waste, control and containment of spills, and discharge of surface runoff and stormwater from the site. All documentation pertaining to these activities and Applicant compliance with any conditions should be forwarded to the State and FEMA for inclusion in the permanent project files.
- The project has been found by the Louisiana Department of Natural Resources (LDNR) to be inside the Louisiana Coastal Zone. LDNR, therefore requires that a complete Coastal Use Permit Application package (Joint Application Form, locality maps, project illustration plats with plan and cross section views, etc.) along with the appropriate application fee, be submitted to their office prior to construction. The Applicant is responsible for coordinating with and obtaining any required Coastal Use Permit(s) (CUP) or other authorizations from the LDNR Office of Coastal Management's Permits and Mitigation Division prior to initiating work. The Applicant must comply with all conditions of the required permits. All documentation pertaining to these activities and Applicant compliance with any conditions should be forwarded to the State and FEMA for inclusion in the permanent project files.
- Per 44 CFR 9.11(d)(3), there shall be no new construction or substantial improvement of structures unless the lowest floor of the structures (including basement) is at or above the level of the base flood. Furthermore, per 44 CFR 9.11(d)(6), 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. The Applicant is required to coordinate with the local floodplain administrator

regarding floodplain permit(s) prior to the start of any activities. All documentation pertaining to these activities and Applicant compliance with any conditions should be forwarded to the LA GOHSEP and FEMA for inclusion in the permanent project files. Per 44 CFR 9.11(d)(9), for the replacement of building contents, materials and equipment, where possible, disaster-proofing of the building and/or elimination of such future losses should occur by relocation of those building contents, materials and equipment outside or above the base floodplain.

- Equipment and machinery utilized on the project site must meet all local, state, and federal noise regulations.
- All activities must be conducted in a safe manner in accordance with OSHA work zone traffic safety requirements.
- If human bone or unmarked grave(s) are present with 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.
- 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.
- Any changes or modifications to the proposed project would require a revised USACE determination. Off-site locations of activities such as borrow, disposals, haul-and detour-roads and work mobilization site developments may be subject to the USACE regulatory requirements.
- Hazardous materials associated with construction equipment should be handled according to local, state, and federal regulations in order to minimize the risk of spills and leaks and subsequent impacts to surface and groundwater resources.
- Unusable equipment, debris and material shall be disposed of in an approved manner and location. The Applicant shall handle, manage, and dispose of petroleum products, hazardous materials and/or toxic waste in accordance with all local, state, and federal agency requirements. All documentation pertaining to these activities should be forwarded to the State and FEMA as part of the permanent project files.

- The Applicant is responsible for complying with the Toxic Substances Control Act (TSCA) Section 402(c) requirements. All documentation pertaining to these activities should be forwarded to the State and FEMA as part of the permanent project files.
- If any asbestos containing materials and/or other hazardous materials are found during remediation or repair activities, the Applicant shall comply with all federal, state and local abatement and disposal requirements under the National Emissions Standards for Hazardous Air Pollutants (NESHAP) and Louisiana Administrative Code 33:III 5151. Demolition activities related to Possible Asbestos-Containing Materials (PACM) must be inspected for ACM/PACM where it is safe to do so. Should asbestos containing materials (ACM) be present, the Applicant is responsible for ensuring proper disposal in accordance with the previously referenced Administrative Orders. Demolition activity notification must be sent to the LDEQ before work begins. All documentation pertaining to these activities should be forwarded to the State and FEMA as part of the permanent project files.
- All demolition and renovation activities must be coordinated with the LDEQ prior to initiating work. All documentation pertaining to these activities and Applicant compliance with any conditions should be forwarded to the State and FEMA for inclusion in the permanent project files.

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 State Historical Preservation Officer, U. S. Fish and Wildlife Service, Louisiana Department of Wildlife and Fisheries, 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, and U. S. Army Corps of Engineers. 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) day in the Parish newspaper, *The St. Tammany Farmer*, announcing the availability of this EA for review at the St.

Tammany Parish Slidell Branch Library, Slidell, 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

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Appendix A
Agency Correspondence



State of Louisiana
DEPARTMENT OF NATURAL RESOURCES
OFFICE OF COASTAL MANAGEMENT

06/25/2013

U.S. DEPARTMENT OF HOMELAND SECURITY - FEMA
1 SEINE CT., 4TH FLOOR
NEW ORLEANS, LA 70114

RE: P20130916, Solicitation of Views
U.S. DEPARTMENT OF HOMELAND SECURITY - FEMA
Description: Proposed improvements and repairs to the First United Methodist Church, Fellowship Hall.
Location: 433 Erlanger Ave. Slidell, Lat. 30° 16' 33.78"N, Long. -89° 46' 47.63"W.
Saint Tammany Parish, LA

Dear Joseph Chauvin:

We have received your Solicitation of Views for the above referenced project, which has been found to be inside the Louisiana Coastal Zone. In order for us to properly review and evaluate this project, we require that a complete Coastal Use Permit Application packet (Joint Application Form, locality maps, project illustration plats with plan and cross section views, etc.) along with the appropriate application fee be submitted to our office. Using your complete application, we can provide you with an official determination, and begin the processing of any Coastal Use Permit that may be required for your project. You may obtain a free application packet by calling our office at (225) 342-7591 or (800)-267-4019, or by visiting our website at <http://www.dnr.state.la.us/crm/coastmgt/cup/cup.asp>.

We recommend that, during your planning process, you make every effort to minimize impacts to vegetated wetlands. As our legislative mandate puts great emphasis on avoiding damages to these habitats, in many cases the negotiations involved in reducing such disturbances and developing the required mitigation to offset the lost habitat values delay permit approval longer than any other factor. Additionally, the following sensitive feature may require additional processing time by the appropriate resource agencies: The project is in close proximity to the Slidell Ring Levee, a Louisiana State Master Plan feature.

Should you desire additional consultation with our office prior to submitting a formal application, we recommend that you call and schedule a pre-application meeting with our Permit Section staff. Such a preliminary meeting may be helpful, especially if a permit application that is as complete as possible is presented for evaluation at the pre-application meeting.

If you have any questions, would like to request an application packet or would like to schedule a pre-application meeting, please contact Nicole Dandurand at (225) 342-1076 or monica.dandurand@la.gov.

Sincerely,

A handwritten signature in black ink that reads "Karl L. Morgan". The signature is written in a cursive style with a long, sweeping tail on the letter "y".

Karl L. Morgan
Administrator

Karl L. Morgan/nd

Attachments

Final Plats:

1) P20130916 Final Plats 06/19/2013

cc: Jessica Diez, OCM w/plats
Tim Killeen, CMD/FI w/plats
Saint Tammany Parish w/plats



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

July 3, 2013

Joseph Chauvin
Environmental Protection Specialist
U.S. Department of Homeland Security
FEMA-DR 1603/1607 LA
1 Seine Court, 4th Floor
New Orleans, Louisiana 70114

Dear Mr. Chauvin:

The U.S. Environmental Protection Agency (EPA) has completed your request for a solicitation of views concerning the First United Methodist Church, located in Slidell, Louisiana. The comments that follow are being provided relative to the EPA's *404(b)(1) Guidelines for Specification of Disposal Sites for Dredged or Fill Material (40 CFR Part 230)*.

Our preliminary review revealed that jurisdictional waters of the U.S. do not occur at the proposed site. At this time, the EPA does not object to the project as proposed. Thanks for the opportunity to review the proposed project. If you have any questions or would like to discuss the issue further, please do not hesitate to contact me at Gutierrez.raul@epa.gov or (214) 665-6697.

Sincerely yours,

A handwritten signature in black ink that reads "Raul Gutierrez".

Raul Gutierrez, Ph.D.
Wetlands Section
Water Quality Protection Division



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

June 24, 2013

Ms. Tiffany Spann-Winnfield
Deputy Environmental Liaison Officer
U. S. Dept. of Homeland Security
Federal Emergency Management Agency
1 Seine Ct, 4th Floor
New Orleans, LA 70114

Dear Ms. Spann-Winnfield:

We have received your June 19, 2013, memorandum via email requesting our evaluation of the potential environmental impacts that might result from the following project:

**Construction of a Consolidated Facility
First United Methodist Church's Fellowship Hall
433 Erlanger Avenue
St. Tammany Parish
Slidell, Louisiana**

The project, proposed for financial assistance with Federal Emergency Management Agency funds, is located on the Southern Hills aquifer system which has been designated a sole source aquifer by the EPA. Based on the information provided for the project, we have determined that the project, as proposed, should not have an adverse effect on the quality of the ground water underlying the project site.

This approval of the proposed project does not relieve the applicant from adhering to other State and Federal requirements, which may apply. This approval is based solely upon the potential impact to the quality of ground water as it relates to the EPA's authority pursuant to Section 1424(e) of the Safe Drinking Water Act.

If you did not include a project description, project location, the parish and the federal funding agency if available, please do so in future Sole Source Aquifer correspondence.

If you have any questions on this letter or the sole source aquifer program please contact me at (214) 665-7133.

Sincerely yours,

A handwritten signature in black ink that reads "Michael Bechdol".

Michael Bechdol, Coordinator
Sole Source Aquifer Program
Ground Water/UIC Section

cc: Jesse Means, LDEQ
Joseph Chauvin, FEMA



BOBBY JINDAL
GOVERNOR

State of Louisiana
DEPARTMENT OF WILDLIFE AND FISHERIES
OFFICE OF WILDLIFE

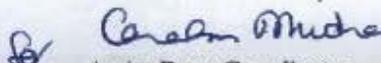
ROBERT J. BARHAM
SECRETARY
JIMMY L. ANTHONY
ASSISTANT SECRETARY

Date June 27, 2013
Name Joseph Chauvin
Company FEMA
Street Address 1 Seine Ct, 4th floor
City, State, Zip New Orleans, La 70114
Project First United Methodist Church
Project ID
Invoice Number 13062711

Personnel of the Habitat Section of the Coastal & Nongame Resources Division have reviewed the preliminary data for the captioned project. After careful review of our 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 the specified site within Louisiana's boundaries.

The Louisiana Natural Heritage Program (LNHP) 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 the request regarding the location in question. The quantity and quality of data collected by the LNHP are dependent on the research and observations of many individuals. In most cases, this information is not the result of comprehensive or site-specific field surveys; many natural areas in Louisiana have not been surveyed. This report does not address the occurrence of wetlands at the site in question. Heritage reports should not be considered final statements on the biological elements or areas being considered, nor should they be substituted for on-site surveys required for environmental assessments. LNHP requires that this office be acknowledged in all reports as the source of all data provided here. If at any time Heritage tracked species are encountered within the project area, please contact the LNHP Data Manager at 225-765-2643. If you have any questions, or need additional information, please call 225-765-2357.

Sincerely,


Armita Bass, Coordinator
Natural Heritage Program



BOBBY JINDAL
GOVERNOR

State of Louisiana
DEPARTMENT OF WILDLIFE AND FISHERIES
OFFICE OF WILDLIFE

ROBERT J. BARNAM
SECRETARY
JIMMY L. ANTHONY
ASSISTANT SECRETARY

INVOICE

RETAIN THIS COPY FOR YOUR RECORDS

Date June 27, 2013
Invoice Number 13062711
Project First United Methodist Church

Name Joseph Chauvin
Company FEMA
Street Address 1 Seine Ct, 4th floor
City, State, Zip New Orleans, La 70114
Number of Quads Reviewed 1
Total Due \$0.00

Payment should be made to "Louisiana Department of Wildlife & Fisheries" within 30 days of the date of this invoice. Please include the invoice number on your check and return a copy of this invoice with your remittance to the following address:

Louisiana Department of Wildlife & Fisheries
Attn: Jennifer Riddle
P.O. Box 80399
Baton Rouge, LA 70898-0399

Should you have any questions regarding this invoice, for review of the Louisiana Natural Heritage database for information on known sensitive elements at a charge of \$30.00 per quad reviewed, please contact LNHP at (225) 765-2357.



BOBBY JINDAL
GOVERNOR

State of Louisiana
DEPARTMENT OF WILDLIFE AND FISHERIES
OFFICE OF WILDLIFE

ROBERT J. BARHAM
SECRETARY
JIMMY L. ANTHONY
ASSISTANT SECRETARY

INVOICE

RETURN THIS COPY OF INVOICE WITH PAYMENT

Date June 27, 2013
Invoice Number 13062711
Project First United Methodist Church

Name Joseph Chauvin
Company FEMA
Street Address 1 Seine Ct, 4th floor
City, State, Zip New Orleans, La 70114
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DEPARTMENT OF THE ARMY
NEW ORLEANS DISTRICT, CORPS OF ENGINEERS
P. O. BOX 60267
NEW ORLEANS, LOUISIANA 70160-0267

SEP 16 2013

REPLY TO
ATTENTION OF

Operations Division
Operations Manager,
Completed Works

Mr. Joseph Chauvin
Environmental Department
U.S. Department of Homeland Security
Federal Emergency Management Agency
1 Seine Court, 4th Floor
New Orleans, Louisiana 70114

Dear Mr. Chauvin:

This is in response to the Solicitation of Views request dated June 19, 2013, concerning the renovation of the First United Methodist Church Fellowship Hall at 433 Erlanger Avenue, at Slidell, Louisiana, in St. Tammany Parish.

We have reviewed your request for potential Department of the Army regulatory requirements and impacts on any Department of the Army projects.

We do not anticipate any adverse impacts to any Corps of Engineers projects.

Based on review of recent maps, aerial photography, and soils data, we have determined that this property is not in a wetland subject to Corps' jurisdiction. A Department of the Army permit under Section 404 of the Clean Water Act will not be required for the deposition or redistribution of dredged or fill material on this site or for construction of new facilities on the existing location.

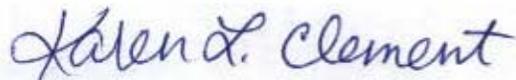
You are advised that this approved jurisdictional determination is valid for a period of 5 years from the date of this letter unless new information warrants revision prior to the expiration date or the District Commander has identified, after public notice and comment, that specific geographic areas with rapidly changing environmental conditions merit re-verification on a more frequent basis.

Off-site locations of activities such as borrow, disposals, haul-and detour-roads and work mobilization site developments may be subject to Department of the Army regulatory requirements and may have an impact on a Department of the Army project.

Please contact Mr. Robert Heffner, of our Regulatory Branch by telephone at (504) 862-1288, or by e-mail at Robert.A.Heffner@usace.army.mil for questions concerning wetlands determinations or need for on-site evaluations. Questions concerning regulatory permit requirements may be addressed to Mr. Michael Farabee by telephone at (504) 862-2292 or by email at Michael.V.Farabee@usace.army.mil.

Future correspondence concerning this matter should reference our account number MVN 2013-02056-SQ. This will allow us to more easily locate records of previous correspondence, and thus provide a quicker response.

Sincerely,

A handwritten signature in blue ink that reads "Karen L. Clement". The signature is written in a cursive style with a large initial 'K'.

Karen L. Clement
Solicitation of Views Manager



Trahan, Amy <amy_trahan@fws.gov>

AI #1293: First United Methodist Church, Slidell

1 message

Chauvin, Joseph <Joseph.Chauvin@fema.dhs.gov>

Wed, Jun 19, 2013 at 9:39 AM

To: "Amy_Trahan@fws.gov" <Amy_Trahan@fws.gov>

Cc: "Pitts, Melanie" <melanie.pitts@fema.dhs.gov>, "Spann, Tiffany" <Tiffany.Spann@fema.dhs.gov>

**U.S.
Department of
Homeland Security**

**Federal
Emergency
Management
Agency**

FEMA-DR 1603/1607 LA

**1 Seine Ct,
4th Floor**

**New
Orleans, LA 70114**



FEMA

This project has been reviewed for effects to Federal trust resources under our jurisdiction and currently protected by the Endangered Species Act of 1973 (Act). The project, as proposed,
() Will have no effect on those resources
() Is not likely to adversely affect those resources.
This finding fulfills the requirements under Section 7(a)(2) of the Act.

June 19, 2013

[Handwritten Signature]
Date

Acting Supervisor
Louisiana Field Office
U.S. Fish and Wildlife Service

Ms. Amy Trahan

Appendix B
Floodplain and Wetland
8-Step Planning Documentation

**First United Methodist Church (FUMC) – Improved Project
Education and Administration Building Consolidation
AI #1293
Improvements in the Floodplain
FEMA 1603-DR-LA**

Executive Order 11988 - FLOODPLAIN MANAGEMENT
Executive Order 11990 - WETLAND PROTECTION

8-STEP PROCESS CHECKLIST

Date: 10/28/2013

Prepared By: Joseph Chauvin, CFM, Environmental Protection Specialist

Project: Hurricane Katrina, DR-1603, impacted St. Tammany Parish, Louisiana and resulted in a presidentially declared major disaster. Hurricane Katrina made final landfill near the Slidell area around 9:45 a.m. Central Standard Time with sustained winds estimated at 120 mph. Floodwaters associated with the storm inundated the First United Methodist Church (FUMC) site with close to 5 feet of water and destroyed 95% of the complex's contents. This project proposes improvements (i.e. addition, renovations) to the FUMC's Education and Administration Building. Prior to Katrina, this facility was used for a pre-school, community outreach classes, and to administer the Applicant's Mother's Day Out (MDO) Program.

Currently, this facility is being used only for administrative and storage functions due to damages sustained during the disaster event. Specifically, the Proposed Action includes renovations necessary to restore the facility's educative, administrative, and family services functions and construction necessary to convert approximately 4,000 square feet of interior green space into new classroom/MDO space. This project would expand the Applicant's current abilities to offer educational and family services to the public by addressing the FUMC's present lack of functioning facility space.

Public Assistance grant funded projects carried out in the floodplain or affecting the floodplain must 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 relevant, applicable and required local codes and standards; thereby, reducing the risk of future flood loss, minimizing the impacts of floods on safety, health, and welfare, and preserving/restoring beneficial floodplain values as required by Executive Order 11988.

These projects 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 FEMA's implementing regulation found at 44 Code of Federal Regulations (CFR) Part 9. 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.

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

The project is located in relation to floodplains as mapped by:

Preliminary Digital Flood Insurance Map Panel 22103C 0495F, dated 4/30/2008, places this project in Zone "AE," EL 11, base flood elevations determined. ABFE Map LA-MM41, dated 1/18/2006, places this project in an ABFE Zone EL 10.

The project is located in a wetland as identified by:

A review of the U.S. Fish and Wildlife National Wetland Inventory indicates the proposed project location is not 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:

In general, FEMA has an obligation to provide adequate information to enable the public to have impact on the decision outcome for all actions having the potential to affect, adversely, or be affected by floodplains or wetlands that it proposes. FEMA shall provide the public with adequate information and opportunity for review and comment at the earliest possible time and throughout the decision-making process; and upon completion of this process, provide the public with an accounting of its final decision (see 44 CFR §9.12). A Cumulative Initial 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.

Furthermore, a National Environmental Policy Act (NEPA) Environmental Assessment (EA) has been drafted to determine if the proposed improvements, as described, will have the potential for significant adverse effects on the quality of the human and natural

environment. The results of the investigation are being used to make a decision whether to initiate preparation of an Environmental Impact Statement or to prepare a Finding of No Significant Impact. The availability of the Draft EA was advertised in the *St. Tammany Farmer*, a Parish publication, on January 9, 2014. The Draft EA was also provided to the Pontchartrain Branch Library in Slidell and made available on the FEMA website, at <http://www.fema.gov/media-library/search/Methodist>, for public inspection and invited comments to be submitted with instructions for submission.

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 - Alternatives identified as described below:
- **Alternative 1: No Action (Eliminated from Further Consideration)** – No action would leave the Applicant’s abilities to provide educational and family services to the public diminished due to damages caused by Hurricane Katrina.
 - **Alternative 2: Construction of Multi-Level Facility** – Construction of a multi-level facility at the proposed project site would expand the Applicant’s current abilities to offer educational and family services to the public by addressing the FUMC’s present lack of functioning facility space. All construction activities would be conducted in a manner that meets applicable codes and standards, and, additionally, complies with the requirements specified in EO 11988 and the implementing regulation at 44 CFR Part 9. However, this alternative is not a favorable action to the Applicant as the foundation improvements necessary make the action cost-prohibitive.
 - **Alternative 3: Relocation of Facilities to an Alternate Site** – Relocation of the needed FUMC facilities is not practicable as no feasible alternative sites were identified by the Applicant.
 - **Alternative 4: Consolidation of Education and Administration Building (Proposed Action)** - Expansion and renovation of the Education and Administration Building would expand the Applicant’s current abilities to offer educational and family services to the public by addressing the FUMC’s present lack of functioning facility space. All construction activities would be conducted in a manner that meets

applicable codes and standards, and, additionally, complies with the requirements specified in EO 11988 and the implementing regulation at 44 CFR Part 9. Furthermore, the expansion/renovation of the Education and Administration Building is a practicable option because it has been determined by the applicant to be a viable alternative that is economically feasible, socially acceptable, and has been determined by the community leaders to serve the best interests of the entire community.

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 identified as described below:

Alternative 4: This alternative includes the expansion and renovation of a facility located in the base floodplain and, therefore, represents investment at risk subject to damage during future flood events. Facilities damaged in future flooding may result in the need for disaster assistance.

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 - Mitigation measures identified in the EA Document or as described below:

Alternative 4: Construction shall be in accordance with 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). Accordingly, per 44 CFR 9.11(d)(3), there shall be no new construction or substantial improvement of structures unless the lowest floor of the structures (including basement) is at or above the level of the base flood. Furthermore, per 44 CFR 9.11(d)(6), 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. The replacement of building contents, materials and equipment, where possible, disaster-proofing of the building and/or elimination of such future losses should occur by

relocation of those building contents, materials and equipment outside or above the base floodplain.

STEP 6 **Reevaluate the proposed action to determine first, if it's 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's the only practicable location.**

- Not applicable - Project is not located in a floodplain or in a wetland.
- Applicable - Action proposed is located in the only practicable location as described below:

The proposed action is the chosen 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 National Environmental Policy Act (NEPA) Environmental Assessment (EA) has been drafted to determine if the Proposed Action will have the potential for significant adverse effects on the quality of the human and natural environment. The results 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. The availability of the Draft EA and this 8-step for public review will be announced in the Parish newspaper. A 15 day comment period will follow the Public Notice publication.

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 - Approval conditioned on review of implementation and post-implementation phases to ensure compliance with the order(s).

Project shall be reviewed by FEMA at grant closeout to ensure the project was completed in accordance with all relevant and applicable floodplain ordinances, codes and standards and that all project actions were undertaken in accordance with terms and conditions stipulated to mitigate and minimize adverse effects in or to the floodplain and wetlands.

Appendix C
Public Notice

**PUBLIC NOTICE OF AVAILABILITY
DRAFT ENVIRONMENTAL ASSESSMENT AND
DRAFT FINDING OF NO SIGNIFICANT IMPACT FOR
IMPROVED PROJECT FOR THE FIRST UNITED METHODIST CHURCH,
EDUCATION AND ADMINISTRATION BUILDING**

Interested parties are hereby notified that the Federal Emergency Management Agency (FEMA) prepared an Environmental Assessment (EA) for a proposed renovation and expansion of the First United Methodist Church's Education and Administration Building, located at 433 Erlanger Avenue, Slidell, Louisiana (Latitude: 30.276050, Longitude: -89.779896). This facility suffered damages as a result of Hurricane Katrina, diminishing the Applicant's educative and administrative capabilities. The proposed action would not only restore but would expand functions lost due to storm damages. The Applicant (i.e. First United Methodist Church) seeks federal grant funds for this action eligible under a Presidential Disaster Declaration, signed on August 29, 2005 (FEMA-1603-DR-LA).

Specifically, the proposed action includes renovations necessary to restore and expand the facility's pre-Katrina functions and construction necessary to convert current green spaces into a 4,000 square foot addition, which would be used for educational and family services purposes. Ground disturbing activities would be limited to those areas needed to construct the foundation, stage construction materials, install utilities, and construct an associated driveway. Per the National Environmental Policy Act (42 U.S.C. 4371 *et seq.*), and associated environmental statutes, a Draft EA has been prepared to evaluate the action's potential impacts on the human and natural environment. This Draft EA summarizes the purpose and need, site selection process, affected environment, and potential environmental consequences associated with the proposed action.

The public comment period will be 15 days, beginning on January 9, 2014, and concluding on January 23, 2014. Written comments on the Draft EA or related matters can be faxed to FEMA's Louisiana Recovery Office at (504) 762-3232; or mailed to FEMA Louisiana Recovery Office, 1 Seine Court, New Orleans, Louisiana 70114. The Draft EA can be viewed and downloaded from FEMA's website: <http://www.fema.gov/media-library/search/Methodist>. A public notice will be published for 1 day in the Parish newspaper, The St. Tammany Farmer, announcing the availability of the Draft EA for public review at the St. Tammany Parish Slidell Branch Library at 555 Robert Boulevard, Slidell, Louisiana (hours are 9:00 AM to 8:00 PM, Mon.-Thurs. and 9:00 AM to 5:00PM Fri.-Sat.).

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 Draft EA will become the Final EA.

If no substantive comments are received, the Draft EA and associated Finding of No Significant Impact (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 Photographs



**Education and Administration Building
(Proposed Project Site),
View from 3rd Street/Sgt. Alfred Street**



**Education and Administration Building,
View from Erlanger Ave.**



**Education and Administration Building,
Interior Green Space**



**Education and Administration Building,
Southern Wing
(Currently Being Used as Storage)**



New Playground



Sanctuary

Appendix E
Draft FONSI



FEMA

U.S. Department of Homeland Security
Louisiana Recovery Office
1 Seine Court
New Orleans, Louisiana 70114

**DRAFT FINDING OF NO SIGNIFICANT IMPACT
FIRST UNITED METHODIST CHURCH IMPROVED PROJECT
SLIDELL, ST. TAMMANY PARISH, LOUISIANA
*FEMA-1603-DR-LA***

Introduction

As a result of damages from Hurricane Katrina on August 29, 2005, the Federal Emergency Management Agency (FEMA) was authorized under a Presidential disaster declaration (FEMA-1603-DR-LA) to provide Federal assistance to designated disaster areas in Louisiana. The Robert T. Stafford Disaster Relief and Emergency Assistance Act (PL 93288), Section 406, authorizes FEMA's Public Assistance (PA) Program to provide financial and other forms of assistance to State and local governments to support response, recovery, and mitigation efforts following Presidentially declared disasters.

In accordance with 44 CFR Part 10, FEMA's regulations to implement the National Environmental Policy Act (NEPA), an Environmental Assessment (EA) was prepared. The purpose of the EA was to analyze the potential environmental impacts associated with the expansion and renovation of the First United Methodist Church's Education and Administration Building and to determine whether to prepare an Environmental Impact Statement (EIS) or a Finding of No Significant Impact (FONSI).

Proposed Action

The proposed action is for the expansion and renovation of the First United Methodist Church's Education and Administration Building. This facility's educative and administrative capabilities have been diminished due to damages caused by Hurricane Katrina. Specifically, the proposed action includes renovations necessary to restore the facility's pre-Katrina functions and construction necessary to convert current green spaces into a 4,000 square foot addition, which would be used for educational and family services purposes.

Findings

FEMA has evaluated the proposed project for significant adverse impacts to geology and soils, water resources (wetlands, floodplains and other waters), coastal resources, biological resources, cultural resources, air quality, noise, hazardous materials and environmental justice. During the construction period, short-term impacts to water quality, air quality, and noise are anticipated. All short-term impacts require conditions to minimize and mitigate impacts to the proposed project site and surrounding areas.

Conditions

The following conditions must be met as part of the implementation of the project. Failure to comply with these conditions may jeopardize federal funds:

- 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.
- Applicant shall comply with all local, state, and federal requirements related to sediment control, disposal of solid waste, control and containment of spills, and discharge of surface runoff and stormwater from the site.
- If the project results in a discharge to waters of the State, a Louisiana Pollution Discharge Elimination System (LPDES) permit may be required in accordance with the Clean Water Act and the Louisiana Clean Water Code. If the project results in a discharge of wastewater to an existing wastewater treatment system, that wastewater treatment system may need to modify its LPDES permit before accepting the additional wastewater. 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 contractor should ensure compliance with all local, state, and federal requirements related to sediment control, disposal of solid waste, control and containment of spills, and discharge of surface runoff and stormwater from the site. All documentation pertaining to these activities and Applicant compliance with any conditions should be forwarded to the State and FEMA for inclusion in the permanent project files.
- The project has been found by the Louisiana Department of Natural Resources (LDNR) to be inside the Louisiana Coastal Zone. Therefore, the LDNR requires that a complete Coastal Use Permit Application package (Joint Application Form, locality maps, project illustration plats with plan and cross section views, etc.) along with the appropriate application fee, be submitted to their office prior to construction. The Applicant is responsible for coordinating with and obtaining any required Coastal Use Permit(s) (CUP) or other authorizations from the LDNR Office of Coastal Management's Permits and Mitigation Division prior to initiating work. The Applicant must comply with all conditions of the required permits. All documentation pertaining to these activities and Applicant compliance with any conditions should be forwarded to the State and FEMA for inclusion in the permanent project files.
- Per 44 CFR 9.11(d)(3), there shall be no new construction or substantial improvement of structures unless the lowest floor of the structures (including basement) is at or above the level of the base flood. Furthermore, per 44 CFR 9.11(d)(6), 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. The Applicant is required to coordinate with the local floodplain administrator regarding floodplain permit(s) prior to the start of any activities. All documentation pertaining to these activities and Applicant compliance with any conditions should be forwarded to the LA GOHSEP and FEMA for inclusion in the permanent project files. Per 44 CFR 9.11(d)(9), for the replacement of building contents, materials and equipment, where possible, disaster-

proofing of the building and/or elimination of such future losses should occur by relocation of those building contents, materials and equipment outside or above the base floodplain.

- Equipment and machinery utilized on the project site must meet all local, state, and federal noise regulations.
- All activities must be conducted in a safe manner in accordance with OSHA work zone traffic safety requirements.
- If human bone or unmarked grave(s) are present with 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.
- 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.
- Any changes or modifications to the proposed project would require a revised USACE determination. Off-site locations of activities such as borrow, disposals, haul-and detour-roads and work mobilization site developments may be subject to the USACE regulatory requirements.
- Hazardous materials associated with construction equipment should be handled according to local, state, and federal regulations in order to minimize the risk of spills and leaks and subsequent impacts to surface and groundwater resources.
- Unusable equipment, debris and material shall be disposed of in an approved manner and location. The Applicant shall handle, manage, and dispose of petroleum products, hazardous materials and/or toxic waste in accordance with all local, state, and federal agency requirements. All documentation pertaining to these activities should be forwarded to the State and FEMA as part of the permanent project files.
- The Applicant is responsible for complying with the Toxic Substances Control Act (TSCA) Section 402(c) requirements. All documentation pertaining to these activities should be forwarded to the State and FEMA as part of the permanent project files.
- If any asbestos containing materials and/or other hazardous materials are found during remediation or repair activities, the Applicant shall comply with all federal, state, and local abatement and disposal requirements under the National Emissions Standards for Hazardous Air Pollutants (NESHAP) and Louisiana Administrative Code 33:III 5151. Demolition activities related to Possible Asbestos-Containing Materials (PACM) must be inspected for

ACM/PACM where it is safe to do so. Should asbestos containing materials (ACM) be present, the Applicant is responsible for ensuring proper disposal in accordance with the previously referenced Administrative Orders. Demolition activity notification must be sent to the LDEQ before work begins. All documentation pertaining to these activities should be forwarded to the State and FEMA as part of the permanent project files.

- All demolition and renovation activities must be coordinated with the LDEQ prior to initiating work. All documentation pertaining to these activities and Applicant compliance with any conditions should be forwarded to the State and FEMA for inclusion in the permanent project files.

Conclusion

The results of these evaluations, as well as consultations and input from other federal and state agencies, are presented in the EA. Based on the information analyzed, FEMA has determined that the implementation of the proposed action would not result in significant adverse impacts to the quality of the natural and human environment. In addition, the proposed project does not appear to have the potential for significant cumulative effects when combined with past, present and reasonably foreseeable future actions. As a result of this FONSI, an EIS will not be prepared (per 44 CFR Part 10) and the proposed project as described in the EA may proceed.

Public Review and Comment

The Draft EA can be viewed and downloaded from FEMA's website at: <http://www.fema.gov/media-library/search/Desire>. The Draft EA will also be available for public review at the St. Tammany Parish Slidell Branch Library, located at 555 Robert Boulevard, Slidell, Louisiana 70458. A legal notice will be posted in the Parish newspaper, *The St. Tammany Farmer*, on January 9, 2014. If no substantive comments are received, the Draft EA will become final and the initial Public Notice will also serve as the final Public Notice.

Approval:

_____, Environmental Liaison Officer Date
Louisiana Recovery Office
FEMA-1603/1607-DR-LA

Thomas M. Womack, Director Date
Louisiana Recovery Office
FEMA-1603/1607-DR-LA