Environmental Assessment

Xavier Physical Building #11 and Jani King Building Change of Location and Consolidation Project

New Orleans, LA

DR-1603-LA

January 2014

FEMA

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

TABLE OF CONTENTS

LIST OF FIGURES

LIST OF TABLES

APPENDICES

LIST OF ACRONYMS

ABFE	Advisory Base Flood Elevation
ACHP	Advisory Council on Historic Preservation
ADA	American Disabilities Act
BFE	Base Flood Elevation
BMP	Best Management Practices
CAA	Clean Air Act
CBRS	Coastal Barrier Resources System
CEQ	Council on Environmental Quality
CMU	Concrete Masonry Unit
CUP	Coastal Use Permit
DFIRM	Digital Flood Insurance Rate Map
EA	Environmental Assessment
ECD	Erosion Control Devices
EIS	Environmental Impact Statement
FEMA	Federal Emergency Management Agency
FONSI	Finding of No Significant Impact
GOHSEP	Louisiana Governor's Office of Homeland Security and Emergency Preparedness
HSDRRS	Hurricane and Storm Damage Risk Reduction System
LSB	
LDEQ	Louisiana Department of Environmental Quality
LDNR	Louisiana Department of Natural Resources
LDWF	Louisiana Department of Wildlife and Fisheries
LPDES	Louisiana Pollutant Discharge Elimination System
NEPA	National Environmental Policy Act
NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act
NRCS	Natural Resources Conservation Services
OHSA	Occupational Safety and Health Administration
PA	Public Assistance
RCRA	Resource Conservation and Recovery Act
sf	square feet
SHPO	State Historic Preservation Office/Officer
SPOC	Single-Point-of-Contact
SOV	Solicitation of Views
USACE	United States Army Corps of Engineers
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USDA	United States Department of Agriculture

This Page was Intentionally Left Blank

1.0 INTRODUCTION

1.1 Project Authority

Hurricane Katrina, a category three (3) hurricane with a storm surge above normal high tide levels, moved across the Louisiana, Mississippi, and Alabama Gulf Coasts on August 29, 2005. Maximum sustained winds at landfall were estimated at 140 miles per hour. President George W. Bush declared a major disaster for the state of Louisiana due to damages from Hurricane Katrina and signed a disaster declaration (FEMA-1603-DR-LA) on August 29, 2005, authorizing the Department of Homeland Security's Federal Emergency Management Agency (FEMA) to provide federal assistance in designated areas of Louisiana. FEMA is administering this disaster assistance 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 repair, restore, and replace state and local government and certain Private Nonprofit facilities damaged as a result of the declared event.

This Environmental Assessment (EA) has been prepared in compliance with the National Environmental Policy Act of 1969 (NEPA), the President's Council on Environmental Quality regulations implementing NEPA (Title 40 of the Code of Federal Regulations [CFR] Parts 1500 to 1508), and FEMA's regulations implementing NEPA (44 CFR Parts 9 and 10).

The purpose of this EA is to analyze potential environmental impacts of the proposed project. FEMA will use the findings in this Draft EA to determine whether to prepare an Environmental Impact Statement (EIS) or a Finding of No Significant Impact (FONSI).

1.2 Background

Orleans Parish, which is comprised of the City of New Orleans, is located in southeast Louisiana. It is approximately 350 square miles, of which approximately 180 square miles (approximately 51.5 percent) is land; the remainder is open water (Figure 1). Orleans Parish is bordered to the east by Lake Borgne, St. Bernard Parish, and Plaquemines Parish; to the south by the Mississippi River, Plaquemines Parish, and Jefferson Parish; to the west by Jefferson Parish; and to the north by Lake Pontchartrain and St. Tammany Parish. Orleans Parish has approximately 343,829 citizens according to 2010 census figures. New Orleans is located approximately 70 miles from Baton Rouge, the state capitol of Louisiana, and approximately 105 miles upriver from the Gulf of Mexico.

Xavier University of New Orleans (Xavier University), founded by Saint Katharine Drexel and the Sisters of the Blessed Sacrament, is a Catholic and historically African-American university (Figure 2). Xavier University was original established as a high school in 1915. The four-year college program was added in 1925. In 1970, the Sisters transferred control of the University to a joint amateur/religious Board of Trustees, of which Dr. Norman C. Francis is the longest tenured college president in the United

States. Dr. Francis is a 1952 Xavier University graduate who has served as president since 1968.

The college continues to retain its distinction as the only historically African-American, Catholic University in the United States. Prior to Hurricane Katrina (2005), the University's enrollment was 4,100. Although the university is open to all persons, the student body is predominantly African American (73%) and more than one-half of the university's 3,178 students are from Louisiana (Xavier University website, 2013).

Figure 1: Orleans Parish, Louisiana, Site Location Map

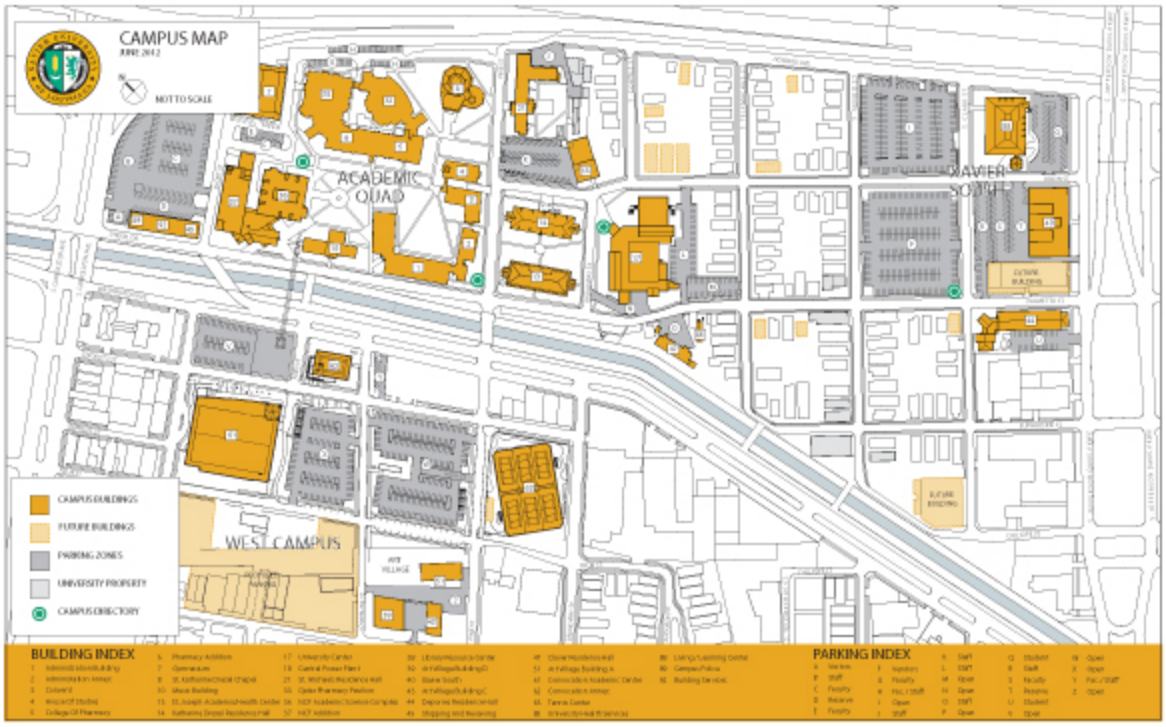

Figure 2: Xavier University, New Orleans, LA

2.0 PURPOSE AND NEED

2.1 Purpose

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 purpose of the project is to restore educational support services that were lost due to Hurricane Katrina.

2.2 Need

Wind, rain, and flooding from Hurricane Katrina destroyed many of the facilities and functions of Xavier University. Prior to Hurricane Katrina, Xavier University utilized two (2) buildings, the Jani King Building and the Physical Plant Building #11(Physical Plant), to house maintenance and cleaning staff, equipment, and storage. Currently, these functions and staff are being lodged in temporary facilities. The functions of Jani King are currently operates from a mobile trailer at the site, and the functions served from the Physical Plant are temporary relocated between two (2), separate, permanent buildings. Xavier University is in need of permanent facilities to operate its maintenance and cleaning functions and house staff.

3.0 ALTERNATIVES CONSIDERED

3.1 No Action

Implementation of the No Action Alternative would entail no public assistance funding for the damaged facilities. Xavier University would be left without adequate facilities to house staff and supplies for maintenance and cleaning of the university.

3.2 Alternative One (1): Reconstruct the Physical Plant and The Jani King in the original locations

Under this alternative Xavier University would replace each structure to its pre-disaster condition and in the original locations. The applicant would continue to use each building as its original functions.

Per FEMA Project Worksheet 15692 the original Physical Plant Building was located at 5016 Howard Avenue (29.964806, -90.105103) (Figure 3). The building was constructed in 1933 as a one (1) story, 3,480 square foot (sf) structure with concrete foundation, exterior concrete masonry units, interior wood studs with gypsum board walls, and an asphalt tile flat roof. It was used as the Physical Plant office building and locker room. FEMA determined the building was eligible for replacement (See Appendix A for photos).

Per FEMA Project Worksheet 9999 the original Jani King Building was located at Latitude 29.964103 and Longitude -90.105680 (Figure 4). The building was constructed circa 1940 as a single story, 2,100 sf structure with a concrete masonry unit (CMU) foundation and walls which supported an asphalt, built-up roof. The structure served as a janitorial supply/service facility prior to Hurricane Katrina. FEMA determined the building was eligible for replacement (See Appendix A for photos).

Replacement of each of the facilities would require the applicant to elevate the structures in order to comply with current floodplain codes and standards along with ensuring construction and American Disabilities Act (ADA) codes and standards are met. As this alternative was evaluated, Xavier University determined there was not enough room on the sites to reconstruct the buildings while complying with current codes and standards. This alternative will not be further evaluated because it cannot be carried out; there is not enough space in the current location to comply with codes and standards.

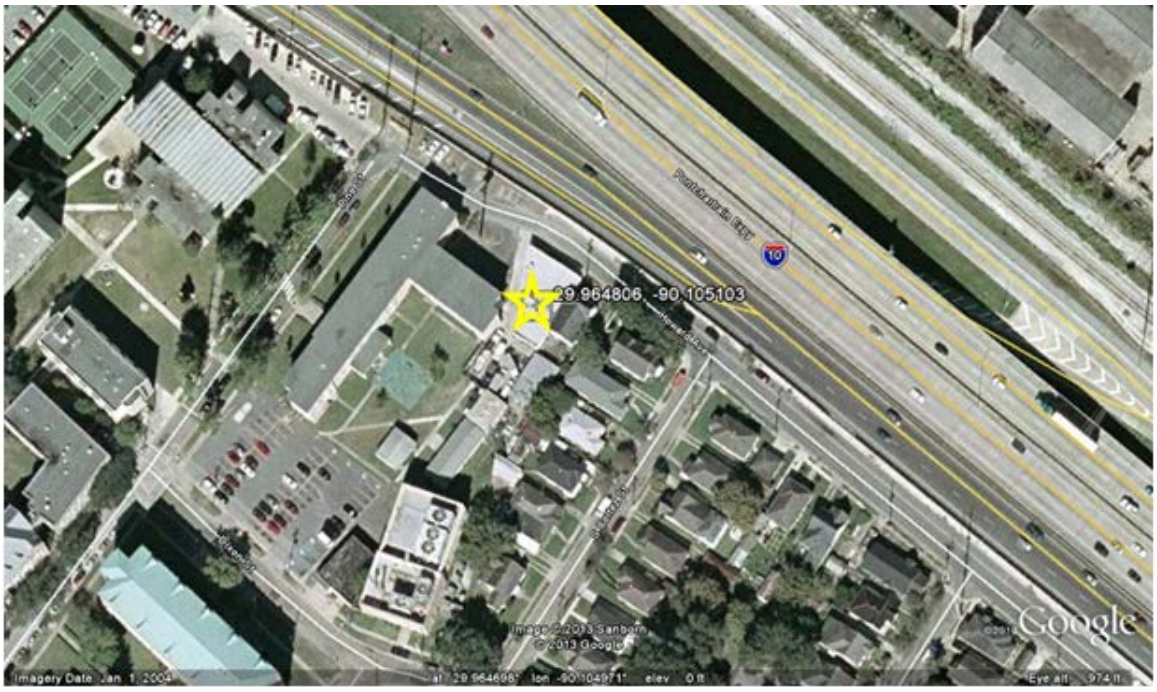

Figure 3: Original location of Building #11 Maintenance Building (2004 image)

Figure 4: Original Location of Jani King Building (2004 image)

3.3 Alternative Two (2) (Preferred): Relocation of the Physical Plant and the Jani King office to a parcel of land on the Xavier Campus

This alternative would consolidate the Jani King building and the Physical Plant into one (1) structure located at 1111 S. Clark St, New Orleans, LA (29.960649, -90.104799). The new structure would be a 5, 200 sf, one (1) story building to be used as office and storage space (Figure 5). Site improvements would include utilities, drainage, parking, a driveway, access ramps, stairs to the building, and sidewalks (Figure 6). The building would be built to meet codes and standards (see Appendix B for architect drawings and proposed site layout). This alternative meets the purpose and need, thus it will be carried forward and evaluated.

Figure 5: Proposed Site of New Maintenance Facility

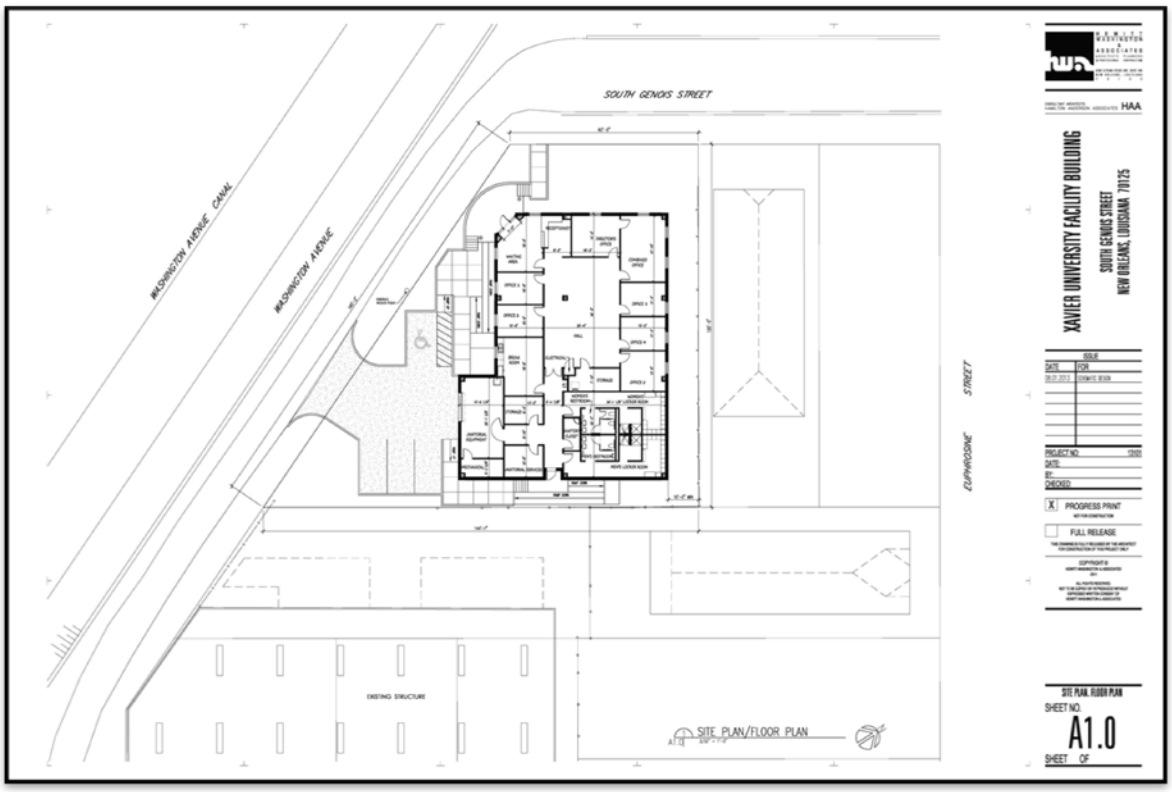

Figure 6: Proposed Site Layout of New Building

3.4 Alternative Three (3): Relocation of the Physical Plant and the Jani King office to the former Crescent Plywood Building.

This alternative involves relocating the functions of the Physical Plant and the Jani King office to the existing Crescent Plywood building (Figure 5). The applicant purchased the Crescent Plywood building and land after Hurricane Katrina. The building is located at latitude 29.96023 and longitude -90.1045; it is a warehouse type, slab on grade structure, and is approximately 30,000 sf. It has approximately 5,000 sf of finished space and the remaining is unfinished and empty. The applicant would restore and refurbish the building to make it a suitable space. To accomplish this, the applicant would refurbish the finished space to serve the needed functions, and perform extensive repairs to repair existing holes within the envelope of the structure. In addition, the structure would be brought to current codes and standards along with floodplain requirements. This alternative meets the purpose and need; it will be carried forward and evaluated.

4.0 Affected Environment and Impacts

4.1 Impact Summary

The following matrix summarizes the results of the environmental review process (Tables 1 and 2). Potential environmental impacts that were found to be negligible are not evaluated further. Resource areas that have the potential for impacts of minor, moderate, or major intensity are further developed in the following sections. Definitions of the impact intensity are described below:

Negligible: The resource area (e.g., geology) would not be affected, or changes would be either non-detectable or if detected, would have effects that would be slight and local. Impacts would be well below regulatory standards, as applicable. Affects to Cultural Resources are either non-existent, i.e. building is less than 50 years old and/or no known archeological sites are present on the site, or it is determined project is not likely to affect and SHPO/THPO concurs. No mitigation is needed.

Minor: Changes to the resource would be measurable, although the changes would be small and localized. Impacts would be within or below regulatory standards, as applicable. Mitigation measures would reduce any potential adverse effects. Affects to Cultural Resources are not likely, i.e. building is 50 years old and/or known archeological sites are near the project area, but special conditions/mitigation is required to maintain the not likely determination.

Moderate: Changes to the resource would be measurable and have both localized and regional scale impacts. Impacts would be within or below regulatory standards, but historical conditions are being altered on a short-term basis. Mitigation measures would be necessary and the measures would reduce any potential adverse effects. Affects to Cultural Resources are likely, i.e. building is 50 years old and/or known archeological sites are in the project area. Impacts would have localized and regional scale impacts.

Major: Changes would be readily measurable and would have substantial consequences on a local and regional level. Impacts would exceed regulatory standards. Mitigation measures to offset the adverse effects would be required to reduce impacts, though long-term changes to the resource would be expected. Affects to Cultural Resources are likely, i.e. building is 50 years old and/or known archeological sites are in the project area. Impacts would have substantial consequences on a localized and regional level.

Table 1 - Affected Environment and Environmental Consequences Matrix: Alternative Two (2) (Preferred)- Relocation of the Physical Plant and the Jani King Office to a Parcel of Land on the Xavier Campus

Resource Area	Impact Intensity				Impact Summary	Agency Coordination / Permits	Mitigation
	Negligible	Minor	Moderate	Major			
Geology and Soils	X				Potential for short-term localized increase in soil erosion during construction. The U.S. Department of Agriculture (USDA)-Natural Resources Conservation Service (NRCS) Alexandria, LA office. Per review of the NRCS Web Soil Survey, the soil located on the proposed project area (Schriever Clay) is classified as a prime farmland soil; however, this site is located in an urban area and Farmland Protection Policy Act is precluded.	Response to Solicitation of Views (SOV) letter received from NRCS on 8/19/13 Louisiana Department of Environmental Quality (LDEQ) SOV response on 9/5/13. (See Appendix C)	Implement construction Best Management Practices (BMPs); install silt fences/straw bales to reduce sedimentation. Area soils would be covered and/or wetted during construction. If fill is stored on site as part of unit installation or removal, the contractor would be required to appropriately cover it. Construction contractor would be required to obtain applicable Louisiana Pollutant Discharge Elimination System (LPDES) permit, and implement stormwater pollution prevention plan. See also Section 6.0.
Hydrology and Floodplains (Executive Order 11988)		X			Per Preliminary Digital Floodplain Insurance Rate Map (DFIRM) panel # 22071C 0228F dated 11/09/2012, the proposed site is partly located in a shaded Zone X, 0.2 PCT Annual Chance Flood Hazard and partly in a Flood Zone AE, EL -2', Base Flood Elevation (BFE) determined. Per Advisory Base Flood Elevation (ABFE) Map # LA-CC-30 dated 06/05/06, this site in Flood Zone AE, (EL 0.5') or 3' above the Highest Existing Adjacent Grade. If any portion of the proposed structure is located within the Special Flood Hazard Area, the more restrictive floodplain regulation must be enforced. 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.	Preliminary DFIRM panel # 22071C 0228F dated 11/09/2012 ABFE Map # LA-CC-30 dated 06/05/06	The applicant is required to coordinate with the local floodplain administrator regarding floodplain permit(s) prior to the start of any activities. All coordination pertaining to these activities and applicant compliance with any conditions should be documented and copies forwarded to the state and FEMA for inclusion in the permanent project files. As per 44 CFR 9.11 (d) (9), mitigation or minimization standards must be applied, where possible. The replacement of building contents, materials and equipment should be, where possible, wet or dry-proofed, elevated, or relocated to or above the Preliminary DFIRM BFE or local floodplain ordinances, whichever is more stringent. If the construction is built on an open works foundation, rather than fill, and the parking lot maintains existing grade and uses porous pavement techniques there will be no discernible adverse impacts. Using fill to elevate structure may also be an acceptable option, but would likely have more impacts than an open frame foundation building. See also Section 4.2 and Section 6.0.

Resource Area	Impact Intensity				Impact Summary	Agency Coordination / Permits	Mitigation
	Negligible	Minor	Moderate	Major			
Wetlands (Executive Order 11990)	X				U.S. Fish and Wildlife Service (USFWS)-mapped wetlands are not present in the proposed project area. Per correspondence from U.S. Environmental Protection Agency (USEPA) there are no wetlands in the area	USACE Solicitation response letter dated 9/27/13 USEPA Solicitation response letter dated8/27/13. (See Appendix C)	Any changes or modifications to the proposed project will require a revised determination. Off-site locations of activities such as borrow, disposals, haul- and detour roads, and work mobilization site developments may be subject to USACE regulatory requirements.
Surface Water and Water Quality	X				Potential for short-term localized increase in sedimentation during construction.	Louisiana Department of Environmental Quality (LDEQ) email dated 9/5/13. United States Army Corps of Engineers (USACE) letter dated 9/27/13 (See Appendix D)	If the project results in a discharge to waters of the state, submittal of a LPDES application may be necessary. 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. All precautions should be observed to control nonpoint source pollution from construction activities. LDEQ has stormwater general permits for construction areas equal to or greater than one acre. It is recommended that you contact the LDEQ Water Permits Division at (225) 219-9371 to determine if your proposed project requires a permit. If the project will include a sanitary wastewater treatment facility, a Sewage Sludge and Biosolids Use or Disposal Permit application or Notice of Intent must be submitted no later than January 1, 2013. Additional information may be obtained on the LDEQ website at http://www.deq.louisiana.gov/portal/tabid/2296/Default.aspx or by contacting the LDEQ Water Permits Division at (225) 219- 9371. All precautions should be observed to protect the groundwater of the region. Please be advised that water softeners generate wastewaters that may require special limitations depending on local water quality considerations. Therefore if your water system improvements include water softeners, you are advised to contact the LDEQ Water Permits to determine if special water quality-based limitations will be necessary. Any renovation or remodeling must comply with LAC 33:III.Chapter 28, Lead-Based Paint Activities; LAC 33:III.Chapter 27, Asbestos-Containing Materials in Schools and State Buildings (includes all training and accreditation); and LAC 33:III.5151, Emission Standard for Asbestos for any renovations or demolitions. If any solid or hazardous wastes, or soils and/or groundwater contaminated with hazardous constituents are encountered during the project, notification to LDEQ's Single-Point-of-Contact (SPOC) at (225) 219-3640 is required. Additionally, precautions should be taken to protect workers from these hazardous constituents See also Section 6.0.

Resource Area	Impact Intensity				Impact Summary	Agency Coordination / Permits	Mitigation
	Negligible	Minor	Moderate	Major			
Groundwater	X				Orleans Parish does not overlie a Sole Source Aquifer. Project as proposed is not expected to affect any ground water.	USEPA letter dated 8/27/13. LDEQ email dated 9/5/13. (See Appendix C)	The contractor should observe all precautions to protect the groundwater of the region. See also Section 6.0.
Wild and Scenic River	X				There are no Wild and Scenic Rivers in the vicinity.	Louisiana Department of Wildlife and Fisheries (LDWF) letter dated 8/21/13. (See Appendix C)	
Coastal Resources	X				According to the Louisiana Department of Natural Resources (LDNR), the project site is located within the Louisiana Coastal Zone and will require a Coastal Use Permit (CPU). The project is not located within the Coastal Barrier Resource System (CBRS).	LDNR response letter dated 8/19/13 (See Appendix C) preliminary DFIRM 22071C 0228F (for CBRS)	The applicant is responsible for coordinating with and obtaining any required permit(s) from the LDNR Coastal Management Division prior to initiating work. The applicant shall comply with all conditions of the required permit. All coordination pertaining to these activities and applicant compliance with any conditions should be documented and copies forwarded to the state and FEMA for inclusion in the permanent project files. See also Section 6.0.
Air Quality	X				During construction, there is potential for short-term localized increase in vehicle emissions and dust particles. Orleans Parish is classified as attainment with the National Ambient Air Quality Standards and has no general conformity determination obligations.	LDEQ email dated 9/5/13. (See Appendix C)	Vehicle operation times would be kept to a minimum. Area soils would be covered and/or wetted during construction to minimize dust. Any renovation or remodeling must comply with LAC 33:III.Chapter 28, Lead-Based Paint Activities; LAC 33:III.Chapter 27, Asbestos-Containing Materials in Schools and State Buildings (includes all training and accreditation); and LAC 33:III.5151, Emission Standard for Asbestos for any renovations or demolitions. See also Section 6.0.
Vegetation and Wildlife	X				The New Orleans site is partly developed in an urban area and will have negligible effects on vegetation and wildlife.	LDWF determination of no effect, dated 8/21/13. (See Appendix C)	
Threatened and Endangered Species (Endangered Species Act Section 7)	X				No impacts to rare, threatened, or endangered species or critical habitats are anticipated for the proposed project. No state or federal parks, wildlife refuges, or wildlife management areas are known at the specific site.	USFWS determination of no effect on Federal trust resources, dated 8/27/13 (See Appendix C) LDWF letter dated 8/21/13. (See Appendix C)	.

Resource Area	Impact Intensity				Impact Summary	Agency Coordination / Permits	Mitigation
	Negligible	Minor	Moderate	Major			
Bald and Golden Eagle Protection Act of 1940 (Title 16 United States Code [USC] §§668-668c)	X				The bald eagle is protected under the Bald and Golden Eagle Protection Act, which prohibits anyone, without permission from the Secretary of the Interior, from "taking" bald eagles, including their parts, nests, or eggs. The Act provides criminal penalties for persons who "take, possess, sell, purchase, barter, offer to sell, purchase or barter, transport, export or import, at any time or any manner, any bald eagle ... [or any golden eagle], alive or dead, or any part, nest, or egg thereof." The Act defines "take" as "pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb." The bald eagle is protected under the Bald and Golden Eagle Act. Bald eagles are known to occur in Orleans Parish.	Internet Resource: USFWS Bald Eagle Management Guidelines and Conservation Measures – The Bald and Golden Eagle Protection Act	If a bald eagle or its nest is spotted within 1,500 feet of the project site during the months of October through mid-May, the applicant must cease construction activities and contact LDWF and USFWS immediately. All correspondence must be documented and remain in the project permanent files. See also Section 6.0.

Resource Area	Impact Intensity				Impact Summary	Agency Coordination / Permits	Mitigation
	Negligible	Minor	Moderate	Major			
Cultural Resources (National Historic Preservation Act Section 106)	x				The proposed undertaking would utilize FEMA funding to construct a new, combined physical plant and janitorial building at 1111 S. Clark Street, southeast of the main campus. The proposed building is a one-story, approximately 5281 square-foot structure with a flat roof. The facility would include ADA-compliant ramps, and a small parking lot of fewer than 10 parking spaces accessed by way of Calliope Street. Utility work will be confined to the property boundary and existing right-of-way. FEMA has determined that there will be "No Effect" to historic properties. State Historic Preservation Officer (SHPO) concurrence with this determination was received, dated August 30, 2013. Consultation with affected tribes (Alabama-Coushatta Tribe of Louisiana (ACTT), Choctaw Nation of Oklahoma (CNO), Coushatta Tribe of Louisiana CT), Jena Band of Choctaw Indians (JBCI), Mississippi Band of Choctaw Indians (MBCI), Muscogee Creek Nation (MCN), Quapaw Tribe of Oklahoma (QTO), Seminole Nation of Oklahoma (SNO), Tunica-Biloxi Tribe of Louisiana (TBTL)) was conducted per FEMA's Programmatic Agreement dated August 17, 2009 and amended on July 22, 2011 (PA). The CNO submitted written concurrence with the determination. The remaining Tribes did not object within the regulatory timeframes; therefore, 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 PW	FEMA submitted a finding of No Historic Properties Affected to SHPO, ACTT, CNO, CT, JBCI, MBCI, MCN, QTO, SNO, and TBTL. SHPO concurrence with FEMA's determination was received dated August 30, 2013. The CNO also submitted concurrence dated August 29, 2013. The remaining Tribes did not object within the regulatory timeframes; therefore, 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). See Appendix C)	Louisiana Unmarked Human Burial Sites Preservation Act: 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 (24) hours of the discovery. The applicant shall also notify FEMA and the Louisiana Division of Archaeology at 225-342-8170 within seventy-two (72) hours of the discovery. Inadvertent Discovery Clause: If during the course of work, archaeological artifacts (prehistoric or historic) are discovered, the applicant shall stop work in the vicinity of the discovery and take all reasonable measures to avoid or minimize harm to the finds. The applicant shall inform their PA contacts at FEMA, who will in turn contact FEMA Historic Preservation staff. The applicant will not proceed with work until FEMA Historic Preservation completes consultation with the SHPO. See also Section 6.0.

Resource Area	Impact Intensity				Impact Summary	Agency Coordination / Permits	Mitigation
	Negligible	Minor	Moderate	Major			
Environmental Justice (Executive Order 12898)/Socioeconomics	X				New Orleans: According to the 2010 U.S. Census Demographic Profile of New Orleans, LA: the total population is 343,829 with 60.2% Black, 33% White, 5.2% Hispanic, and 2.9% Asian. The median household income is $37,468 and 19% of the population is below poverty level.	U.S. Census Bureau, American Fact Finder, Data for New Orleans, Louisiana accessed September 2013.	
Resource Recovery and Conservation Act (RCRA)	X				Project involves construction of a new building at the proposed site. All debris must be disposed of in an approved landfill.	LDEQ email dated 9/5/13 (See Appendix C)	If any solid or hazardous wastes, or soils and/or groundwater contaminated with hazardous constituents are encountered during the project, notification to LDEQ's SPOC at (225) 219-3640 is required. Additionally, precautions should be taken to protect workers from these hazardous constituents. See also section 6.0
Noise	X				During the construction period there will be a short-term increase in noise levels.	City of New Orleans Noise Ordinance 66-136	City of New Orleans Noise Ordinance limits noise levels by receiving land use. In residential, public, commercial, and industrial areas to varying decibel levels during the "daytime" hours of 7 AM to 10 PM. Construction activities should be limited to this schedule on weekdays Mitigation and abatement measures will be required to reduce the noise levels to a range that would be considered acceptable. Mitigation measures may included: double-paned windows, sound barriers, the use of noise dampening building materials, and insulation of outer walls. See also Section 6.0.
Public Safety and Access	X				No impacts to public safety and security are anticipated.		The contractor would place fencing around the work area perimeters to protect nearby residents from vehicular traffic. To minimize worker and public health and safety risks from project construction and closure, all construction and closure work would be done using qualified personnel trained in the proper use of construction equipment, including all appropriate safety precautions. Additionally, all activities would be conducted in a safe manner in accordance with the standards specified in Occupational Safety and Health Administration (OHSA) regulations and the USACE safety manual. The contractor would post appropriate signage and fencing to minimize potential adverse public safety concerns. See also Section 6.0.
Traffic and Transportation	X				Traffic volumes along the respective work access areas would increase temporarily during work activities.		Appropriate signage and barriers should be in place prior to construction activities in order to alert pedestrians and motorists of project activities and traffic pattern changes. The contractor would implement traffic control measures, as necessary. See also Section 6.0.

Resource Area	Impact Intensity				Impact Summary	Agency Coordination / Permits	Mitigation
	Negligible	Minor	Moderate	Major			
Hazardous Materials and Toxic Wastes	X				Per NEPAssist database search, there are no Louisiana State Brownfield (LSB) sites located within 0 5 miles of the site. The database also revealed 61 hazardous waste (RCRA) facilities within 0 5 miles of the site. No Superfund or Toxic Release Inventory sites were listed. LDEQ was contacted and it was determined no impacts related to hazardous materials and wastes are anticipated.	LDEQ email dated 9/5/13 (See Appendix C) NEPAssist-EPA (See Appendix C)	If hazardous materials are unexpectedly encountered in the project area during the proposed construction operations, appropriate measures for the proper assessment, remediation, management and disposal of the contamination would be initiated in accordance with applicable federal, state, and local regulations. The contractor would be required to take appropriate measures to prevent, minimize, and control the spill of hazardous materials in the construction area. See also Section 6.0.

Table 2 - Affected Environment and Environmental Consequences Matrix: Alternative Three (3)- Relocation of the Physical Plant and the Jani King Office to the Former Crescent Plywood Building.

Resource Area	Impact Intensity				Impact Summary	Agency Coordination / Permits	Mitigation
	Negligible	Minor	Moderate	Major			
Geology and Soils	X				Potential for short-term localized increase in soil erosion during construction.	Response to SOV letter received from NRCS on 8/19/13 LDEQ SOV response on 9/5/13. (See Appendix C)	Implement construction BMPs; install silt fences/straw bales to reduce sedimentation. Area soils would be covered and/or wetted during construction. If fill is stored on site as part of unit installation or removal, the contractor would be required to appropriately cover it. Construction contractor would be required to obtain applicable LPDES permit, and implement stormwater pollution prevention plan.
Hydrology and Floodplains (Executive Order 11988)		X			Per Preliminary DFIRM panel # 22071C 0228F dated 11/09/2012, the Crescent Plywood building is located partly in a Shaded X Flood Zone, 0.2 PCT Annual Chance Flood Hazard, and partly in a Flood Zone AE, EL -2'. Per ABFE Map # LA-CC-30 dated 06/05/06, this site is in Flood Zone AE, (EL 0.5') or 3' above the Highest Existing Adjacent Grade. If any portion of the proposed structure is located within the Special Flood Hazard Area, the more restrictive floodplain regulation needs to be enforced. 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.	Preliminary DFIRM panel # 22071C 0228F dated 11/09/2012 Per ABFE Map # LA-CC-30 dated 06/05/06, this site in Flood Zone AE, (EL 0.5') or 3' above the Highest Existing Adjacent Grade.	Substantial Improvements must be built to the Preliminary DFIRM BFE or local floodplain ordinances; whichever is more stringent and built to current codes and standards. The applicant is required to coordinate with the local floodplain administrator regarding floodplain permit(s) prior to the start of any activities. All coordination pertaining to these activities and applicant compliance with any conditions should be documented and copies forwarded to the state and FEMA for inclusion in the permanent project files. As per 44 CFR 9.11 (d) (9), mitigation or minimization standards must be applied, where possible. The replacement of building contents, materials and equipment should be, where possible, wet or dry-proofed, elevated, or relocated to or above the Preliminary DFIRM BFE or local floodplain ordinances; whichever is more stringent.

Resource Area	Impact Intensity				Impact Summary	Agency Coordination / Permits	Mitigation
	Negligible	Minor	Moderate	Major			
Wetlands (Executive Order 11990)	X				USFWS-mapped wetlands are not present in the proposed project area.	USACE Solicitation response letter dated 9/27/13 USEPA Solicitation response letter dated8/27/13. (See Appendix C)	Any changes or modifications to the proposed project will require a revised determination. Off-site locations of activities such as borrow, disposals, haul- and detour roads, and work mobilization site developments may be subject to USACE regulatory requirements.
Surface Water and Water Quality	X				Project would involve development of the New Orleans site. Potential for short-term localized increase in sedimentation during construction.	LDEQ email dated 9/5/13. USACE letter dated 9/27/13 (See Appendix C)	Implement construction BMPs, install silt fences/straw bales to reduce sedimentation. All precautions should be observed to control nonpoint source pollution from construction activities. LDEQ has stormwater general permits for construction areas equal to or greater than one acre. It is recommended that the applicant contact the LDEQ Water Permits Division at (225) 219-3181 to determine if the proposed project requires a permit
Groundwater	X				Orleans Parish does not overlie a Sole Source Aquifer. No impacts to ground water are anticipated.	USEPA letter dated 8/27/13. LDEQ email dated 9/5/13. (See Appendix C)	The contractor should observe all precautions to protect the groundwater of the region.
Wild and Scenic River	X				There are no Wild and Scenic Rivers in the vicinity of the site.	LDWF letter dated 8/21/13. (See Appendix C)	
Coastal Resources	X				The project site is located within the Louisiana Coastal Zone. The project is not located within the CBRS.	LDNR response letter dated 8/19/13 (See Appendix C) preliminary DFIRM 22071C 0228F (for CBRS)	The applicant is responsible for coordinating with and obtaining any required permit(s) from the LDNR Coastal Management Division prior to initiating work. The applicant shall comply with all conditions of the required permit. All coordination pertaining to these activities and applicant compliance with any conditions should be documented and copies forwarded to the state and FEMA for inclusion in the permanent project files.

Resource Area	Impact Intensity				Impact Summary	Agency Coordination / Permits	Mitigation
	Negligible	Minor	Moderate	Major			
Air Quality	X				During construction, there is potential for short-term localized increase in vehicle emissions and dust particles. Orleans Parish air shed is in attainment for all criteria pollutants per the CAA.	LDEQ email dated 9/5/13. (See Appendix C)	Vehicle operation times would be kept to a minimum. Area soils would be covered and/or wetted during construction to minimize dust. Any renovation or remodeling must comply with LAC 33:III.Chapter 28, Lead-Based Paint Activities; LAC 33:III.Chapter 27, Asbestos-Containing Materials in Schools and State Buildings (includes all training and accreditation); and LAC 33:III.5151, Emission Standard for Asbestos for any renovations or demolitions.
Vegetation and Wildlife	X				The New Orleans site is already developed and will have negligible effects on vegetation and wildlife.	LDWF determination of no effect, dated 8/21/13. (See Appendix C)	
Threatened and Endangered Species (Endangered Species Act Section 7)	X				No impacts to rare, threatened, or endangered species or critical habitats are anticipated for the proposed project. No state or federal parks, wildlife refuges, or wildlife management areas are known at the specific site.	USFWS determination of no effect on Federal trust resources, dated 8/27/13 (See Appendix C) LDWF letter dated 8/21/13. (See Appendix C)	.
Bald and Golden Eagle Protection Act of 1940 (Title 16 United States Code [USC] §§668-668c)	X				The bald eagle is protected under the Bald and Golden Eagle Protection Act, which prohibits anyone, without permission from the Secretary of the Interior, from "taking" bald eagles, including their parts, nests, or eggs. The Act provides criminal penalties for persons who "take, possess, sell, purchase, barter, offer to sell, purchase or barter, transport, export or import, at any time or any manner, any bald eagle ... [or any golden eagle], alive or dead, or any part, nest, or egg thereof." The Act defines "take" as "pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb." The bald eagle is protected under the Bald and Golden Eagle Act. Bald eagles are known to occur in Orleans Parish.	Internet Resource: USFWS Bald Eagle Management Guidelines and Conservation Measures – The Bald and Golden Eagle Protection Act	If a bald eagle or its nest is spotted within 1,500 feet of the project site during the months of October through mid-May, the applicant must cease construction activities and contact LDWF and USFWS immediately. All correspondence must be documented and remain in the project permanent files.

Resource Area	Impact Intensity				Impact Summary	Agency Coordination / Permits	Mitigation
	Negligible	Minor	Moderate	Major			
Cultural Resources (National Historic Preservation Act Section 106)	x				The proposed undertaking would utilize FEMA funding to refurbish the Crescent Plywood building to serve the needed functions. Extensive repairs would be performed to repair existing holes within the envelope of the structure. In addition, the structure would be brought to current codes and standards along with floodplain requirements. Based on research using the NRHP database, the Louisiana Cultural Resources Map on the Louisiana Division of Archaeology's website, and agency files, FEMA has determined that the project area is not located within a listed National Register Historic District nor is it located within the view-shed of a property individually listed in the NRHP. The Crescent Plywood building is older than 50 years of age, but was determined by FEMA to be ineligible for listing on the NRHP. SHPO concurrence with this determination was received, dated August 30, 2013. Depending upon the extent of the ground disturbance, a Historic Preservation review may be required.	SHPO concurrence letter dated August 30, 2013	Louisiana Unmarked Human Burial Sites Preservation Act: 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. Inadvertent Discovery Clause: If during the course of work, archaeological artifacts (prehistoric or historic) are discovered, the applicant shall stop work in the vicinity of the discovery and take all reasonable measures to avoid or minimize harm to the finds. The applicant shall inform their PA contacts at FEMA, who will in turn contact FEMA Historic Preservation staff. The applicant will not proceed with work until FEMA Historic Preservation completes consultation with the SHPO.

Resource Area	Impact Intensity				Impact Summary	Agency Coordination / Permits	Mitigation
	Negligible	Minor	Moderate	Major			
Environmental Justice (Executive Order 12898)/Socioeconomics	X				According to the 2010 U.S. Census Demographic Profile of New Orleans, LA: the total population is 343,829 with 60.2% Black, 33% White, 5.2% Hispanic, and 2.9% Asian. The median household income is $37,468 and 19% of the population is below poverty level. No impacts are anticipated.	U.S. Census Bureau, American Fact Finder, Data for New Orleans, Louisiana accessed September 2013	
Resource Recovery and Conservation Act (RCRA)	X				Project involves renovation of an existing building at a new site. All debris must be disposed of in an approved landfill.	LDEQ email dated 9/5/13 (See Appendix C)	If any solid or hazardous wastes, or soils and/or groundwater contaminated with hazardous constituents are encountered during the project, notification to LDEQ's SPOC at (225) 219-3640 is required. Additionally, precautions should be taken to protect workers from these hazardous constituents
Noise	X				During the construction period there would be a short-term increase in noise levels.	Internet Resource: City of New Orleans Noise Ordinance 66-136	City of New Orleans Noise Ordinance limits noise levels by receiving land use. In residential, public, commercial, and industrial areas to varying decibel levels during the "daytime" hours of 7 AM to 10 PM. Construction activities should be limited to this schedule on weekdays
Public Safety and Access	X				No impacts to public safety and security are anticipated.		The contractor would place fencing around the work area perimeters to protect nearby residents from vehicular traffic. To minimize worker and public health and safety risks from project construction and closure, all construction and closure work would be done using qualified personnel trained in the proper use of construction equipment, including all appropriate safety precautions. Additionally, all activities would be conducted in a safe manner in accordance with the standards specified in OHSA regulations and the USACE safety manual. The contractor would post appropriate signage and fencing to minimize potential adverse public safety concerns.
Traffic and Transportation	X				The work would take place on the property, only anticipated traffic impacts would be due to construction materials and equipment accessing the site. Traffic volumes along the respective work access areas would increase temporarily during work activities.		Appropriate signage and barriers should be in place prior to construction activities in order to alert pedestrians and motorists of project activities and traffic pattern changes. The contractor would implement traffic control measures, as necessary.

Resource Area	Impact Intensity				Impact Summary	Agency Coordination / Permits	Mitigation
	Negligible	Minor	Moderate	Major			
Hazardous Materials and Toxic Wastes	X				Per NEPAssist database search, there are no LSB sites located within 0.5 miles of the site. The database also revealed 61 hazardous waste RCRA facilities within 0.5 miles of the site. No Superfund or Toxic Release Inventory sites were listed. LDEQ was contacted and it was determined no impacts related to hazardous materials and wastes are anticipated.	LDEQ email dated 9/5/13 NEPAssist-EPA (See Appendix C)	If hazardous materials are unexpectedly encountered in the project area during the proposed construction operations, appropriate measures for the proper assessment, remediation, management and disposal of the contamination would be initiated in accordance with applicable federal, state, and local regulations. The contractor would be required to take appropriate measures to prevent, minimize, and control the spill of hazardous materials in the construction area. See also Section 6.0.

4.2 Floodplains

Executive Order 11988 (Floodplain Management) requires federal agencies to avoid, to the extent possible, the long and short-term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct and indirect support of floodplain development wherever there is a practicable alternative. FEMA's regulations for complying with EO 11988 are found at 44 CFR Part 9.

Orleans Parish enrolled in the NFIP on August 3, 1970. The City of New Orleans was given a new set Preliminary DFIRMs. The Parish has not yet adopted these Preliminary DFIRMs; however, FEMA will use this data as it is best data available.

In July 2005, FEMA initiated a series of flood insurance studies for many of the Louisiana coastal parishes as part of the Flood Map Modernization effort through FEMA's National Flood Insurance Fund. These studies were necessary because the flood hazard and risk information shown on many FIRMs was developed during the 1970s, and the physical terrain had changed significantly, such as major loss of wetland areas. After hurricanes Katrina and Rita, FEMA expanded the scope of work to include all of coastal Louisiana. The magnitude of the impacts of Hurricanes Katrina and Rita reinforced the urgency to obtain additional flood recovery data for the coastal zones of Louisiana. More detailed analysis was possible because new data obtained after the hurricanes included information on levees and levee systems, new high-water marks, and new hurricane parameters (LaMP 2007). During an initial post-hurricane analysis, FEMA determined that the "100-Year," or 1-percent chance storm flood elevations on FIRMs for many Louisiana communities, referred to as 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, or ABFEs. The recovery maps and other advisory data were developed to assist parish officials, homeowners, business owners, and other affected citizens with their recovery and rebuilding efforts (LaMP 2007). Updated preliminary flood hazard maps from an intensive five-year mapping project guided by FEMA were provided to all Louisiana coastal parishes. The maps released in early 2008, known as Preliminary DFIRMs, were based on the most technically advanced flood insurance studies ever performed for Louisiana, followed by multiple levels of review. The DFIRMs provided communities with a more scientific approach to economic development, hazard mitigation planning, emergency response and post-flood recovery (LaMP2007).

The USACE completed a Hurricane and Storm Damage Risk Reduction System (HSDRRS) for the Greater New Orleans area (Miller 2011). This 350-mile system of levees, floodwalls, surge barriers, and pump stations will reduce the flood risk associated with a storm event. According to a memo from David Miller, Associate Administrator of Federal Insurance and Mitigation Administration, to Tony Russell, Regional Administrator FEMA Region 6, in September of 2011, the USACE provided FEMA with

assurances that the HSDRRS is capable of defending against a storm surge with a one percent (1%) annual chance event of occurring in any given year. The areas protected include portions of St. Bernard, St. Charles, Jefferson, Orleans, and Plaquemines Parishes. FEMA has revised the preliminary DFIRMS within the HSDRRS to incorporate the reduced flood risk associated with the system improvements.

Where released and available, the 2012 Revised Preliminary DFIRMS are viewed as the best available flood risk data for FEMA's own grant programs in its implementation of E.O. 11988; however, 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 (Miller 2011).

No Action Alternative: Implementation of this alternative would entail no Public Assistance measures for the damaged facilities. Xavier University would be left without adequate facilities to house staff and supplies for maintenance and cleaning of the university. Project would not affect floodplain.

Alternative Two (2) Preferred: Relocation of the Physical Plant and the Jani King office to a parcel of land on the Xavier University Campus: Per Preliminary DFIRM panel # 22071C 0228F dated 11/09/2012, the proposed site is partly located in a shaded Zone X, 0.2 PCT Annual Chance Flood Hazard, and partly in a Flood Zone AE, EL -2', base flood elevation determined. Per ABFE Map # LA-CC-30 dated 06/05/06, this site in Flood Zone AE, (EL 0.5') or 3' above the Highest Existing Adjacent Grade. If any portion of the proposed structure is located within the Special Flood Hazard Area, the more restrictive floodplain regulation must be enforced. 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 coordination pertaining to these activities and applicant compliance with any conditions should be documented and copies forwarded to the state and FEMA for inclusion in the permanent project files. As per 44 CFR 9.11 (d) (9), mitigation or minimization standards must be applied, where possible. The replacement of building contents, materials and equipment should be, where possible, wet or dry-proofed, elevated, or relocated to or above the Preliminary DFIRM BFE or local floodplain ordinances, whichever is more stringent. If the construction is built on an open works foundation, rather than fill, and the parking lot maintains existing grade and uses porous pavement techniques there will be no discernible adverse impacts. Using fill to elevate structure may also be an acceptable option, but would likely have more impacts than an open frame foundation building. See section 6.0.

Alternative Three (3): Relocation of the Physical Plant and the Jani King office to the former Crescent Plywood Building: Per Preliminary DFIRM panel # 22071C 0228F dated 11/09/2012, the Crescent Plywood building is partly located in a Shaded X Flood Zone, 0.2 PCT Annual Chance Flood Hazard, and partly in a Flood Zone AE, EL -2'. Per ABFE Map # LA-CC-30 dated 06/05/06, this site is in Flood Zone AE, (EL 0.5') or 3' above the Highest Existing Adjacent Grade. If any portion of the proposed structure is located within the Special Flood Hazard Area, the more restrictive floodplain regulation needs to be enforced. 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. In addition to meeting current codes and standards, substantial improvements must be built to meet floodplain ordinances. The applicant is required to coordinate with the local floodplain administrator regarding floodplain permit(s) prior to the start of any activities. All coordination pertaining to these activities and applicant compliance with any conditions should be documented and copies forwarded to the state and FEMA for inclusion in the permanent project files. As per 44 CFR 9.11 (d) (9), mitigation or minimization standards must be applied, where possible. The replacement of building contents, materials and equipment should be, where possible, wet or dry-proofed, elevated, or relocated to or above the Preliminary DFIRM BFE or local floodplain ordinances, whichever is more stringent.

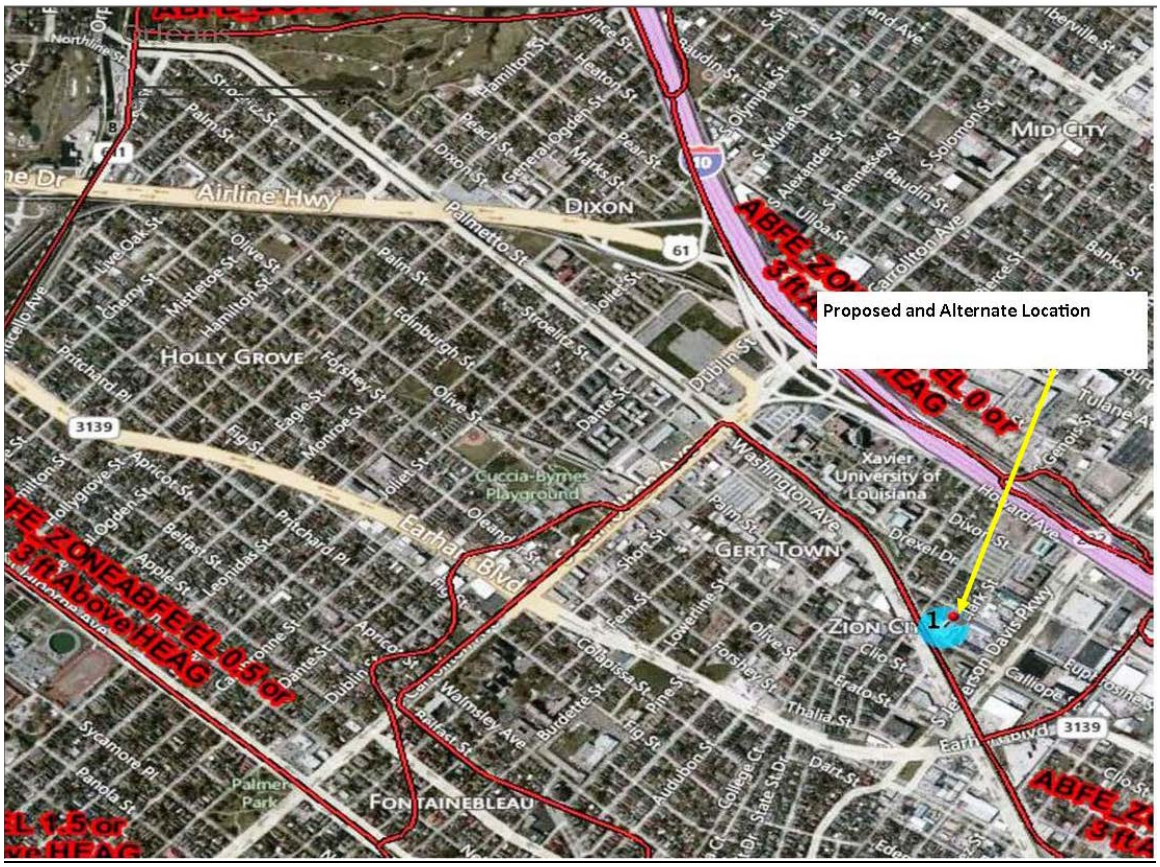

Figure 7: ABFE Map Panel LA-CC-30, the site is located in the 100-year floodplain with a BFE of 0.5' or 3 ft. above the Highest Existing Adjacent Grade (LSUAgCenter.com/Floodmaps)

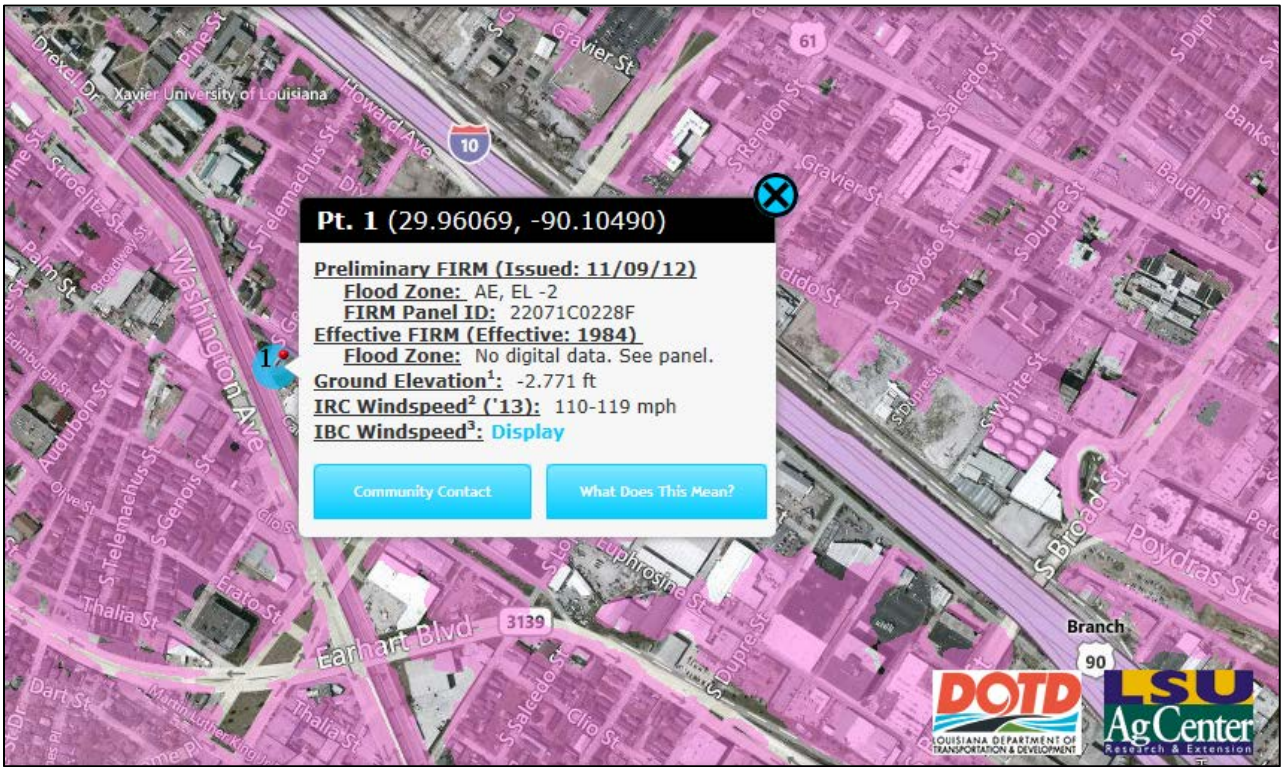

Figure 8: Proposed location Preliminary DFIRM panel 22071C 0228 F (2012), this site is partly located in a Flood Zone AE -1', BFE Determined and partly in a Shaded X, 0.2 PCT Annual Chance Flood Hazard

5.0 CUMULATIVE IMPACTS

The Council on Environmental Quality's (CEQ) regulations state that cumulative impacts represent the "impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions, regardless of what agency (Federal or non-Federal) or person undertakes such other actions." Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time (40 C.F.R. § 1508.7).

In its comprehensive guidance on cumulative impacts analysis under NEPA, the CEQ notes that: "[t]he range of actions that must be considered includes not only the project proposal, but all connected and similar actions that could contribute to cumulative effects" (CEQ, 1997). The term "similar actions" may be defined as "reasonably foreseeable or proposed agency actions [with] similarities that provide a basis for evaluating the environmental consequences together, such as common timing or geography." 40 C.F.R. § 1508.25(a)(3); see also 40 C.F.R. §§ 1508.25(a)(2) and (c).

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 analyzing the contribution of a proposed action to cumulative effects to merely analyze effects within the immediate area of the proposed action (CEQ, 1997, pg. 12). 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 1111 S. Clark St is located in New Orleans' Gert Town neighborhood, within the 70125 zip code geographic area (Figure 9). 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 70125 zip code constitutes an appropriate boundary, for a cumulative impact analysis of the proposed action and alternatives.

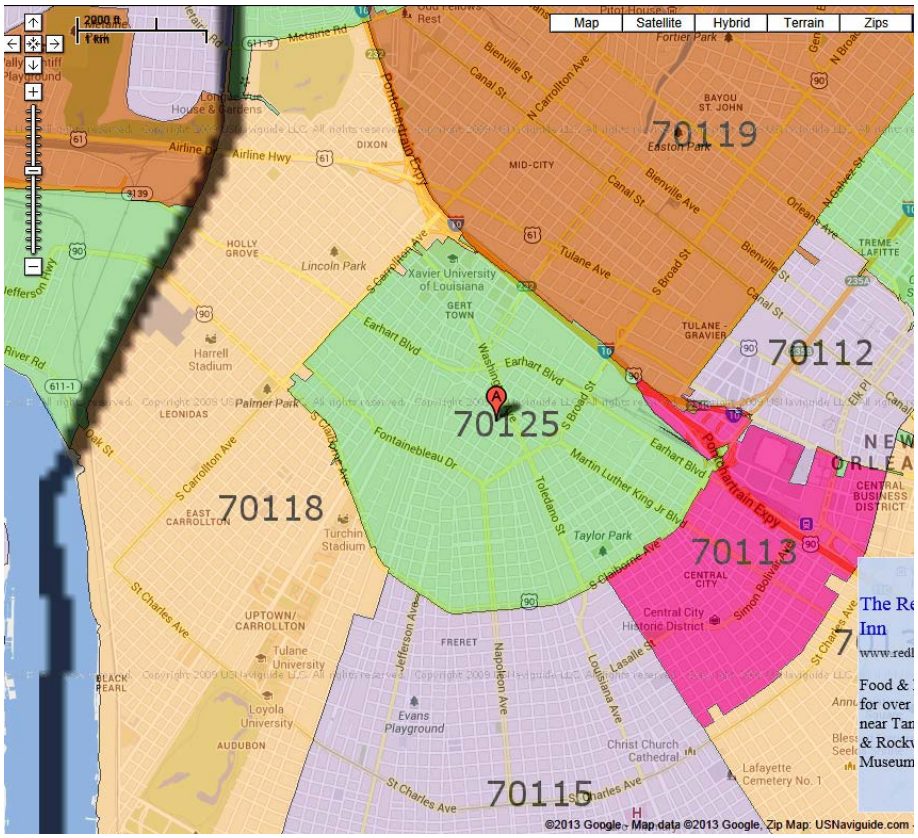

Figure 9: Boundary Map for the 70125 Zip Code Geographic Area

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 953 FEMA PA program funded (28 of which qualified for Alternative Arrangements), and numerous non-FEMA funded, debris removal, protective measures, and repair projects have occurred, are occurring, or are reasonably foreseen to occur (developed with enough specificity to

provide useful information to a decision maker and the interested public) within the 70125 geographic area, to buildings, roads and bridges, recreational and educational facilities, public utilities, waterways, and more (Figure 9). FEMA has funded multiple repair, renovations, and reconfiguration projects on and around the Xavier campus. 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.

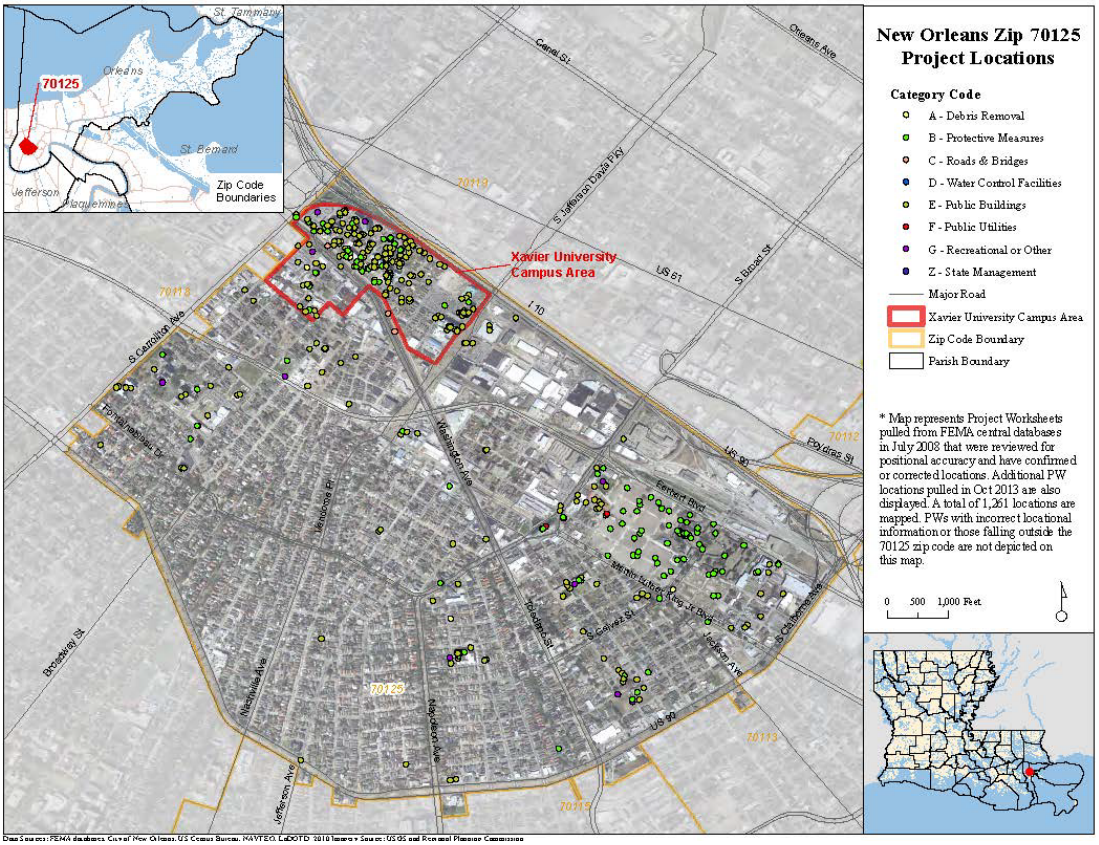

Figure 10: FEMA-Funded Projects Occurring Within the 70125 Zip Code

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

These infrastructure actions, some of which have already occurred, and many of which will occur concurrent with and or subsequent to the proposed action, are necessary as a

result of the unprecedented devastation caused by the 2005 hurricanes, in order to restore pre-disaster conditions. In reviewing impacts, socioeconomic resources were identified as having the most potential to experience cumulative effects. Although devastating, the 2005 storms created an opportunity for the Applicant to serve residents in the Greater New Orleans area and surrounding neighborhoods by enhancing educational and recreational facilities, thus attracting more students and promoting education. Considered in relation to past, present, and reasonably foreseeable future actions, the cumulative impact of the proposed action to the built and natural environment would be minimal, would be beneficial rather than detrimental, and is not expected to contribute to any adverse effects or to otherwise significantly affect the human environment.

5.0 Conditions and Mitigation Measures

Based upon the studies and consultations undertaken in this EA, several conditions and mitigation measures must be taken by the applicant prior to and during project implementation.

- In accordance with applicable local, state, and federal regulations, the applicant is responsible for acquiring any necessary permits and/or clearances prior to the commencement of any construction related activities.

- The applicant is required to coordinate with the local floodplain administrator regarding floodplain permit(s) prior to the start of any activities. All coordination pertaining to these activities and applicant compliance with any conditions should be documented and copies forwarded to the state and FEMA for inclusion in the permanent project files. As per 44 CFR 9.11 (d) (9), mitigation or minimization standards must be applied, where possible. The replacement of building contents, materials and equipment should be, where possible, wet or dry-proofed, elevated, or relocated to or above the Preliminary DFIRM BFE or local floodplain ordinances; whichever is more stringent. If the construction is built on an open works foundation, rather than fill, and the parking lot maintains existing grade and uses porous pavement techniques there will be no discernible adverse impacts. Using fill to elevate structure may also be an acceptable option, but would likely have more impacts than an open frame foundation building.

- Any changes or modifications to the proposed project will require a revised determination. Off-site locations of activities such as borrow, disposals, haul- and detour roads, and work mobilization site developments may be subject to USACE regulatory requirements.

- Construction contractor would be required to obtain applicable LPDES permit, and implement a stormwater pollution prevention plan.

- Implement construction Best Management Practices (BMPs); install silt fences/straw bales to reduce sedimentation. Area soils would be covered and/or wetted during construction. If fill is stored on site as part of unit installation or removal, the contractor would be required to appropriately cover it.

- If the project results in a discharge to waters of the state, submittal of a LPDES application may be necessary.

- 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

- All precautions should be observed to control nonpoint source pollution from construction activities. LDEQ has stormwater general permits for construction areas equal to or greater than one acre. It is recommended that you contact the LDEQ Water Permits Division at (225) 219-9371 to determine if your proposed project requires a permit.

- If the project will include a sanitary wastewater treatment facility, a Sewage Sludge and Biosolids Use or Disposal Permit application or Notice of Intent must be submitted no later than January 1, 2014. Additional information may be obtained on the LDEQ website at http://www.deq.louisiana.gov/portal/tabid/2296/Default.aspx or by contacting the LDEQ Water Permits Division at (225) 219- 9371.

- All precautions should be observed to protect the groundwater of the region.

- Water softeners generate wastewaters that may require special limitations depending on local water quality considerations. Therefore if your water system improvements include water softeners, you are advised to contact the LDEQ Water Permits to determine if special water quality-based limitations will be necessary.

- Any renovation or remodeling must comply with LAC 33:III.Chapter 28, Lead-Based Paint Activities; LAC 33:III.Chapter 27, Asbestos-Containing Materials in Schools and State Buildings (includes all training and accreditation); and LAC 33:III.5151, Emission Standard for Asbestos for any renovations or demolitions.

- Vehicle operation times would be kept to a minimum. Area soils would be covered and/or wetted during construction to minimize dust.

- The applicant is responsible for coordinating with and obtaining any required permit(s) from the LDNR Coastal Management Division prior to initiating work. The applicant shall comply with all conditions of the required permit. All coordination pertaining to these activities and applicant compliance with any conditions should be documented and copies forwarded to the state and FEMA for inclusion in the permanent project files.

- 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 (24) hours of the discovery. The applicant shall also notify FEMA and the Louisiana Division of Archaeology at 225-342-8170 within seventy-two (72) hours of the discovery.

- 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 PA contacts at FEMA, who will in turn contact FEMA Historic Preservation staff. The applicant will not proceed with work until FEMA Historic Preservation completes consultation with the SHPO.

- Any fill or borrow material used must be sourced from areas that do not contain any buried cultural materials (e.g. brick foundations, prehistoric Indian artifacts, human burials, and the like).

- If a bald eagle or its nest is spotted within 1,500 feet of the project site during the months of October through mid-May, the applicant must cease construction activities and contact LDWF and USFWS immediately. All correspondence must be documented and remain in the project permanent files.

- If any solid or hazardous wastes, or soils and/or groundwater contaminated with hazardous constituents are encountered during the project, notification to LDEQ's SPOC at (225) 219-3640 is required. Additionally, precautions should be taken to protect workers from these hazardous constituents.

- City of New Orleans Noise Ordinance limits noise levels by receiving land use. In residential, public, commercial, and industrial areas to varying decibel levels during the "daytime" hours of 7 AM to 10 PM. Construction activities should be limited to this schedule on weekdays

- Mitigation and abatement measures will be required to reduce the noise levels to a range that would be considered acceptable. Mitigation measures may included: double-paned windows, sound barriers, the use of noise dampening building materials, and insulation of outer walls.

- The contractor would place fencing around the work area perimeters to protect nearby residents from vehicular traffic. To minimize worker and public health and safety risks from project construction and closure, all construction and closure work would be done using qualified personnel trained in the proper use of construction equipment, including all appropriate safety precautions. Additionally, all activities would be conducted in a safe manner in accordance with the standards specified in Occupational Safety and Health Administration (OHSA) regulations and the USACE safety manual.

- The contractor would post appropriate signage and fencing to minimize potential adverse public safety concerns.

- The contractor would implement traffic control measures, as necessary.

- If hazardous materials are unexpectedly encountered in the project area during the proposed construction operations, appropriate measures for the proper assessment, remediation, management and disposal of the contamination would be initiated in accordance with applicable federal, state, and local regulations. The contractor would be required to take appropriate measures to prevent, minimize, and control the spill of hazardous materials in the construction area.

Failure to comply with these conditions may make part or the entire project ineligible for FEMA funding.

7.0 PUBLIC INVOLVEMENT

The public is invited to comment on the proposed action. A legal notice was published in the Advocate-New Orleans edition from January 13-15, 2014. Additionally, the Environmental Assessment was made available at the Central City Branch Library and the University Library at Xavier University. The Environmental Assessment was published on FEMA's websites. A copy of the Public Notice is attached in Appendix D.

8.0 AGENCY COORDINATION

Environmental Protection Agency
U.S. Fish and Wildlife Service
U.S. Army Corps of Engineers
Louisiana Department of Wildlife and Fisheries
Louisiana Department of Natural Resources
Louisiana Department of Environmental Quality
USDA Natural Resources Conservation Service
Louisiana State Historic Preservation Office
Tribal Historic Preservation Office and/or cultural offices

9.0 LIST OF PREPARERS

Melanie Pitts, Environmental Specialist, FEMA
Tiffany Spann-Winfield, Deputy Environmental Liaison Officer
LeSchina Holmes, Lead Environmental Protection Specialist
Catherine Dluzak, Historic Preservation Specialist, FEMA
Jason Emery, Historic Preservation Specialist, FEMA
Wayne Berggren, Floodplain Specialist, CFM, FEMA

10.0 REFERENCES

Council for Environmental Quality. Considering Cumulative Effects Under the National Environmental Policy Act (January 2007). Available at, http://ceq.hss.doe.gov/nepa/ccenepa/ccenepa.htm.

Council for Environmental Quality. 40 FAQs, NEPA's Most Asked Forty Questions. Retrieved, June 2013, from http://ceq.hss.doe.gov/nepa/regs/40/40p3.htm

Endangered Species Act of 1973. Available at, http://epw.senate.gov/esa73.pdf.

Environmental Protection Agency. Currently Designated Nonattainment Areas for All Criteria Pollutants. [Online] Available: http://www.epa.gov/oar/oaqps/greenbk/ancl.html#LOUISIANA

Environmental Protection Agency. NEPAssist. [Online] Available: http://www.epa.gov/compliance/nepa/nepassist-mapping.html

Executive Order 11988, Floodplain Management. 1977. Available at, http://www.fema.gov/plan/ehp/ehplaws/eo11988.shtm

Executive Order 11990, Wetlands Management. 1977. Available at, http://www.fema/gov/plan/ehp/ehplaws/eo11990.shtm.

Executive Order 12898, Environmental Justice for Low Income and Minority Populations, 1994 Available at, http://www.fema.gov/plan/ehp/ehplaws/ejeo.shtm.

Federal Emergency Management Agency. 1996. NEPA Desk Reference.

Federal Emergency Management Agency. FEMA RiskMAP6. [Online] Available: http://www.riskmap6.com/Home.aspx

Google Earth. [Online] Available: http://www.google.com/intl/en/earth/index.html

Louisiana Department of Environmental Quality. Air Quality Data. Available at, http://www.deq.louisiana.gov/portal/tabid/37/Default.aspx?Search=non-attainment+areas

Louisiana Department of Environmental Quality. Louisiana State Brownfields List. [Online] Available: http://www.deq.louisiana.gov/portal/tabid/2620/Default.aspx

Louisiana Department of Natural Resources. Coastal Zone Management Act. Available at, http://dnr.louisiana.gov/crm/coastmgt/coastmgt.asp.

LA Statewide PA (2009), *Programmatic Agreement among FEMA, the Louisiana State Historic Preservation Officer (SHPO), the Louisiana Governor's Office of Homeland Security and Emergency Preparedness (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* dated August 17, 2009, as amended July 2011. Available at, http://www.fema.gov/new-orleans-metropolitan-area-infrastructure-projects-2#2.

National Oceanic and Atmospheric Administration. Coastal Barrier Resources Act. Available at, http://www.csc.noaa.gov/cmfp/reference/Coastal_Barrier_Resources_Act.htm

New Orleans Noise Ordinance. [Online] Available: http://www.noisefree.org/cityord/new-orleans.pdf

Miller, David. Memo to Tony Russell, Regional Administrator FEMA Region 6. October 2011.

U.S. Census Bureau. State & County QuickFacts. [Online] Available: http://quickfacts.census.gov/qfd/states/22/2255000.html

U. S. Department of Agriculture. Soil Conservation Service. 1990. *Soil Survey of Orleans Parish, Louisiana.*

U.S. Environmental Protection Agency (USEPA). 2013. Currently Designated Nonattainment Areas for All Criteria Pollutants. Available at, http://www.epa.gov/oar/oaqps/greenbk/ancl.html.

U.S. Fish and Wildlife Service, Information, Planning, and Conservation (IPaC) online system. Available at, http://ecos.fws.gov/ipac/

U.S. Fish and Wildlife Service. Bald Eagle Management Guidelines and Conservation Measures. The Bald and Golden Eagle Protection Act. [Online] Available: http://www.fws.gov/midwest/Eagle/guidelines/bgepa.html

U.S. Fish and Wildlife Service. National Wetlands Inventory. Wetlands Mapper. [Online] Available: http://www.fws.gov/wetlands/Data/Mapper.html

Appendix A
Site Photographs

Appendix B
Construction Plans

Appendix C
Agency Correspondence

Appendix D
Public Notice/Draft FONSI