

Environmental Assessment

Relocation and Improved Project at St. Bernard Manor

St. Bernard Parish, Louisiana

DR-1603-LA

August 2014

**U.S. Department of Homeland Security
Federal Emergency Management Agency, Region VI
Louisiana Recovery Office
New Orleans, Louisiana 70124**



FEMA

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LIST OF ACRONYMS

ADA	Americans with Disabilities Act
ANO	Archdiocese of New Orleans
BFE	Base Flood Elevation
BMP	Best Management Practice
CAA	Clean Air Act
CBRS	Coastal Barrier Resources System
CEQ	Council on Environmental Quality
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CHI	Christopher Homes, Inc.
CMD	Coastal Management Division
CUP	Coastal Use Permit
DFIRM	Digital Flood Insurance Rate Map
DNL	Day/Night Noise Level
EA	Environmental Assessment
EIS	Environmental Impact Statement
FEMA	Federal Emergency Management Agency
FONSI	Finding of No Significant Impact
FPPA	Farmland Protection Policy Act
GCR	General Conformity Rule
GOHSEP	Louisiana Governor's Office of Homeland Security and Emergency Preparedness
HUD	U.S. Department of Housing and Urban Development
LAC	Louisiana Administrative Code
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
LSB	Louisiana State Brownfields
msl	mean sea level
NAAQS	National Ambient Air Quality Standards
NAAAs	Non-Attainment Areas
NEPA	National Environmental Policy Act
NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act
NRCS	Natural Resources Conservation Service
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
USACE	U.S. Army Corps of Engineers
USDA	U.S. Department of Agriculture
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service

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1.0 INTRODUCTION

1.1 Project Authority

Hurricane Katrina, a Category Four (4) hurricane with a storm surge above normal high tide levels, moved across the Louisiana, Mississippi, and Alabama Gulf Coasts on August 29, 2005. Maximum sustained winds at landfall were estimated at 140 miles per hour. 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.

In accordance with 44 Code of Federal Regulation (CFR) for FEMA, Subpart B – Agency Implementing Procedures, Section 10.9, an environmental assessment (EA) was prepared pursuant to Section 102 of the National Environmental Policy Act of 1969 (NEPA), as implemented by the regulations promulgated by the President's Council on Environmental Quality (40 CFR Parts 1500-1508). The purpose of this EA is to analyze potential environmental impacts of the proposed project on the project site and its surroundings. FEMA will use the findings in this EA to determine whether to prepare an Environmental Impact Statement (EIS) or a Finding of no Significant Impact (FONSI).

1.2 Background

St. Bernard Parish is bordered by the Mississippi River, Lake Borgne, Breton Sound, Orleans Parish, and Plaquemines Parish (Figure 1). St. Bernard Parish is located in the New Orleans – Metairie – Kenner metropolitan statistical area and the parish seat is the city of Chalmette, which is located in the northwestern section of the Parish. The city of New Orleans borders Chalmette to the west, and Slidell, Louisiana lies about 30 miles to the north, across Lake Pontchartrain in St. Tammany Parish. Meraux, a city located in St. Bernard Parish, in 2010 had an estimated population of 4,417, down from 8,435 prior to hurricane Katrina, a 52.4 percent reduction in population (U.S. Census Bureau).



Figure 1: St. Bernard Parish (Google Images, 2011)

The Archdiocese of New Orleans (ANO) provides multiple community services including schools and housing to citizens throughout eight (8) civil parishes in the New Orleans Metropolitan Area namely: Jefferson, Orleans, Plaquemines, St. Bernard, St. Charles, St. John the Baptist, St. Tammany, and Washington. As a community service, ANO partners

with the U.S. Department of Housing and Urban Development (HUD) to provide affordable housing to low income and disabled senior citizens within these parishes.

Christopher Homes, Inc. (CHI) is the housing agency of ANO. Founded in 1966, under the auspices of the Archdiocese's Commission on Housing and Community Life, with a mandate to provide decent, affordable housing in the community, the agency has grown to become one of the premier managers of affordable senior housing in the Gulf Coast area.

Many housing communities managed by CHI were damaged or destroyed by Hurricane Katrina. Each of them is being reviewed by ANO to determine if the complexes should be repaired, replaced, or even relocated to meet the changing needs of the surrounding communities. One (1) such development is St. Bernard Manor located at 2440 Archbishop Philip M Hannan Blvd., Meraux, Louisiana 70075. Prior to Hurricane Katrina, the St. Bernard Manor Complex consisted of three (3) apartment buildings, one (1) maintenance building, a multi-purpose building, and related site improvements (see Figures 2 and 3). The site sustained major damage as a result of Hurricane Katrina and was deemed eligible for replacement by FEMA using Federal disaster public assistance.



Figure 2: Original St. Bernard Manor site layout, 2006

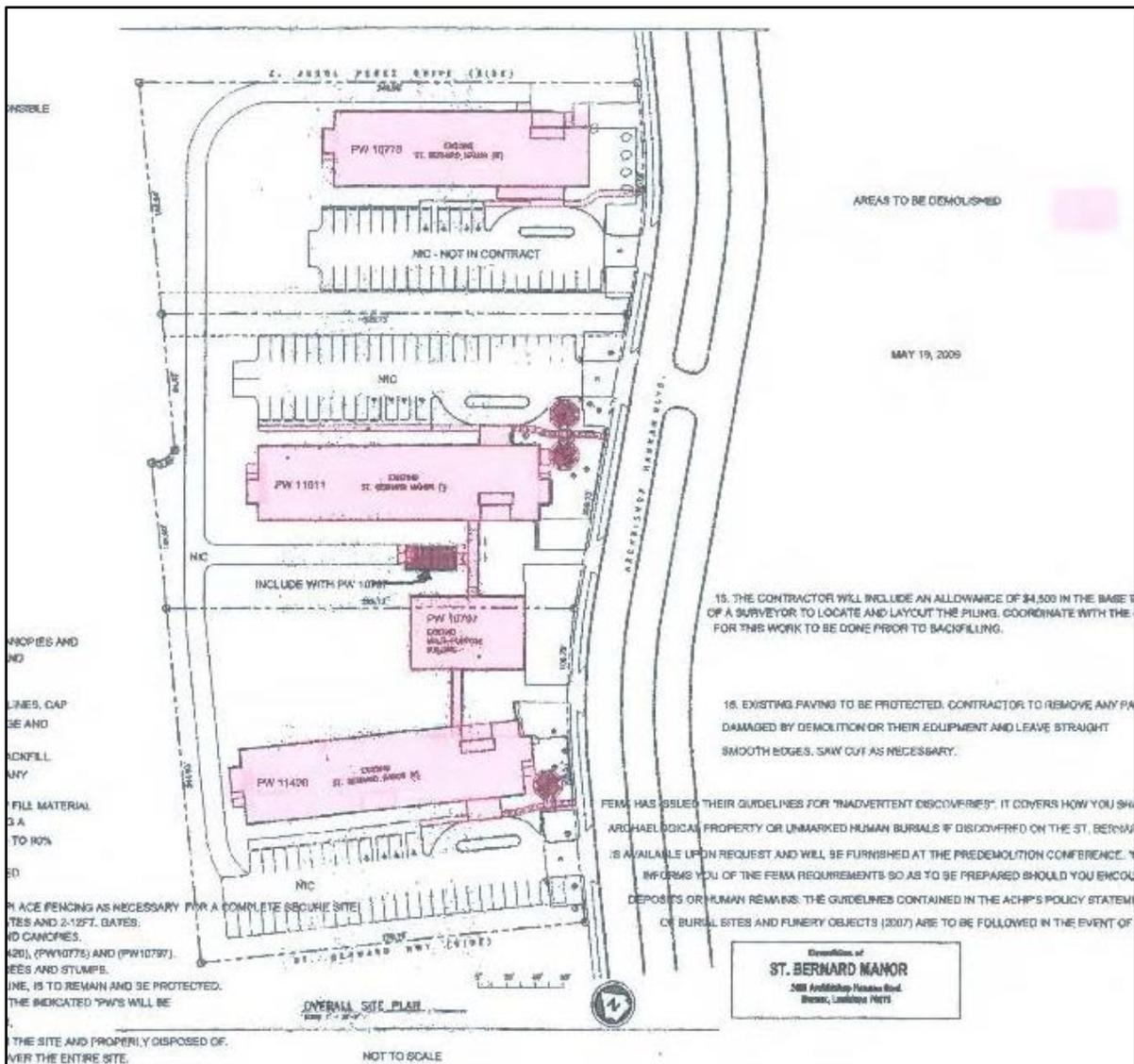


Figure 3: Layout of original buildings

Due to population shifts after the storm, the applicant, in coordination with HUD, decided it would not be in the best interest of the public to rebuild all three (3) apartment buildings. Instead, the applicant proposed to relocate one (1) building to Metairie, Louisiana, and one (1) to Mandeville, Louisiana. FEMA previously adopted HUD's EAs and has issued FONSI on these proposals. In addition, the applicant was previously approved to demolish all improvements on the site and to reconstruct one (1) 5-story apartment building at the original location (Figure 4).

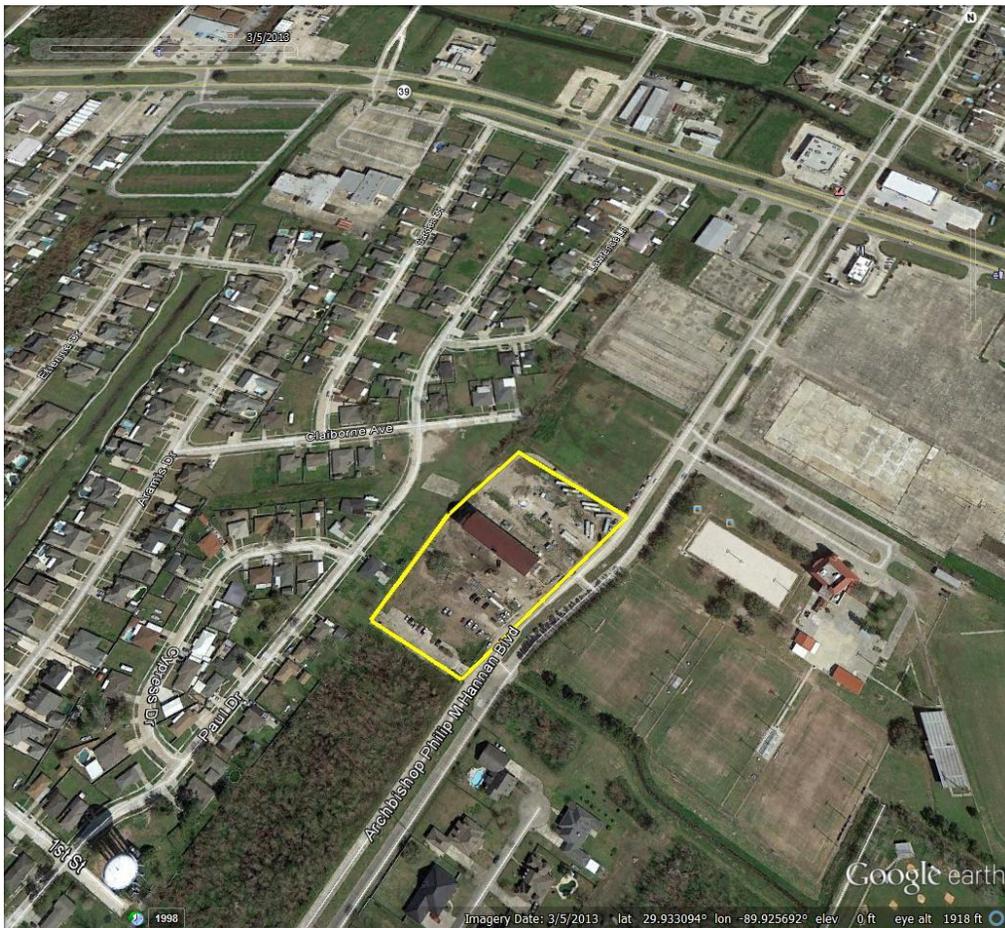


Figure 4: Image of site, outlined in yellow, dated 3/5/13

The apartment building which was reconstructed consists of 62 one (1) bedroom apartments and twenty (20) efficiency apartments. The building was reconfigured, shifted north approximately thirty (30) feet, built to the 2008 Digital Flood Insurance Rate Map (DFIRM) standards, and upgraded to comply with codes and standards. The front of the building now faces south which necessitated relocating the parking lot to the south of the building (see Appendix A for Photos). As a result of the change in configuration, the applicant also installed new utilities.

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 the St. Bernard Manor complex to serve the current low-income, senior community.

2.2 Need

Wind, rain, and flooding from Hurricane Katrina destroyed many of the existing housing properties managed by CHI. Prior to the devastation caused by this hurricane; CHI managed 25 properties which included over 2,500 apartments for HUD subsidized senior housing and one (1) property of 200 HUD subsidized apartments for family housing. St. Bernard Manor is considered a critical housing development for senior citizens. Currently the applicant is in need of restoring support facilities to St. Bernard Manor.

3.0 ALTERNATIVES CONSIDERED

3.1 No Action

Implementation of the No Action Alternative would entail no public assistance measures for the damaged facilities. Consequently, the support facilities would be left completely destroyed. The applicant would no longer have the ability to provide onsite services for the social needs of the community nor the maintenance needs of the structure and grounds.

3.2 Preferred Alternative: Construct a new multi-purpose building in a different footprint and construct a new maintenance facility in a new location A

The applicant now seeks funding to build a new multi-purpose building and maintenance facility on the site; Figure 5 illustrates the new proposed changes for the two (2) buildings. The previous maintenance facility was a 36' x 16', 576 square feet (sf), single story building, with a low pitched roof. It was constructed in 2004 on a concrete slab and all metal R-panel exterior walls and roof surfaces. It was originally located at the coordinates of Latitude 29.932311, and Longitude -89.925846, which is where the current parking lot is now located. The applicant proposes to relocate the building to Latitude: 29.932517, Longitude -89.92641, as shown in Figure 5. The new maintenance facility would be a prefabricated metal building with slab on grade foundation, and served with underground electrical, water, and sewer services from the multi-purpose building.

The original multi-purpose building was demolished, and the applicant installed a new chain-linked fence in its location. Therefore, the new multi-purpose building would be reconstructed approximately 13 feet to the south/southwest of the original building (Figure 5). To accomplish this, the applicant would remove an existing driveway and an underground grease trap that served the original structure. The new building would be the same material and size as the original, a 5,600 sf (40' X 80'), pre-engineered steel structure with a standing seam steel roof and steel siding. As with the previous building, the new one would contain a kitchen, restroom, and large open room which could serve as a gathering space. The rear of the building a porch would serve as additional gathering space. The new building would be elevated to current codes and standards and be Americans with Disabilities Act (ADA) compliant. New underground utilities, a grease trap, sidewalks, and a driveway would be installed. This alternative supports the purpose and need and will be carried forward.

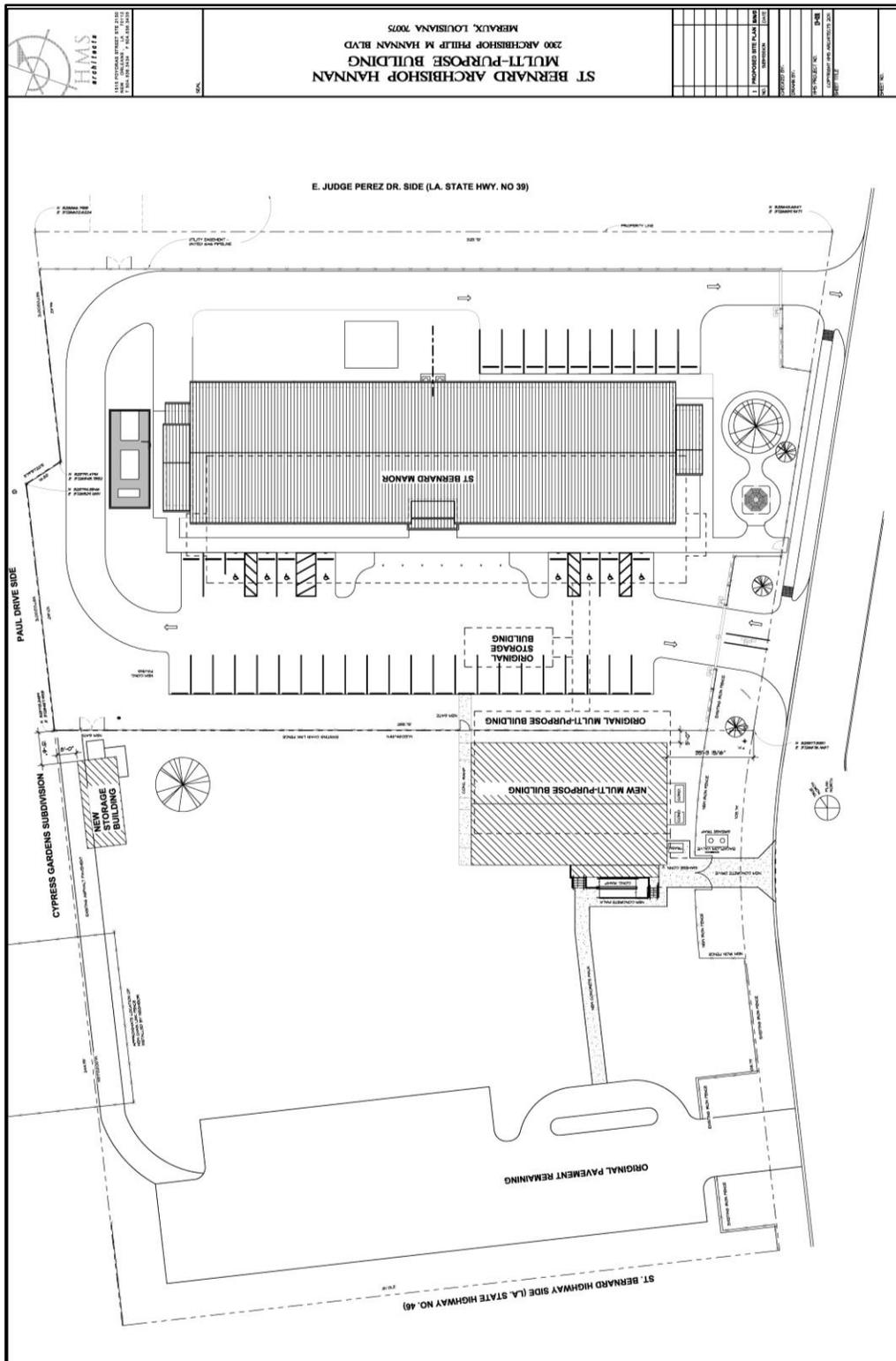


Figure 5: St. Bernard Manor-proposed site layout of multi-purpose building and maintenance building at location A

3.3 Alternative Three (3): Construct a new multi-purpose building in a different footprint and construct a new maintenance facility in a new location B

The applicant now seeks funding to build a new multi-purpose building and maintenance facility on the site; Figure 5 illustrates the new proposed changes for the two (2) buildings. The previous maintenance facility was a 36' x 16', 576 square feet (sf), single story building, with a low pitched roof. It was constructed in 2004 on a concrete slab and all metal R-panel exterior walls and roof surfaces. It was originally located at the coordinates of Latitude 29.932311, and Longitude -89.925846, which is where the current parking lot is now located. The applicant proposes to relocate the building to the proposed location in Figure 6 The new maintenance facility would be a prefabricated metal building with slab on grade foundation, and served with underground electrical, water, and sewer services from the multi-purpose building.

The original multi-purpose building was demolished, and the applicant installed a new chain-linked fence in its location. Therefore, the new multi-purpose building would be reconstructed approximately 13 feet to the south/southwest of the original building (Figure 5). To accomplish this, the applicant would remove an existing driveway and an underground grease trap that served the original structure. The new building would be the same material and size as the original, a 5,600 sf (40' X 80'), pre-engineered steel structure with a standing seam steel roof and steel siding. As with the previous building, the new one would contain a kitchen, restroom, and large open room which could serve as a gathering space. The rear of the building a porch would serve as additional gathering space. The new building would be elevated to current codes and standards and be Americans with Disabilities Act (ADA) compliant. New underground utilities, a grease trap, sidewalks, and a driveway would be installed. This alternative supports the purpose and need and will be carried forward.

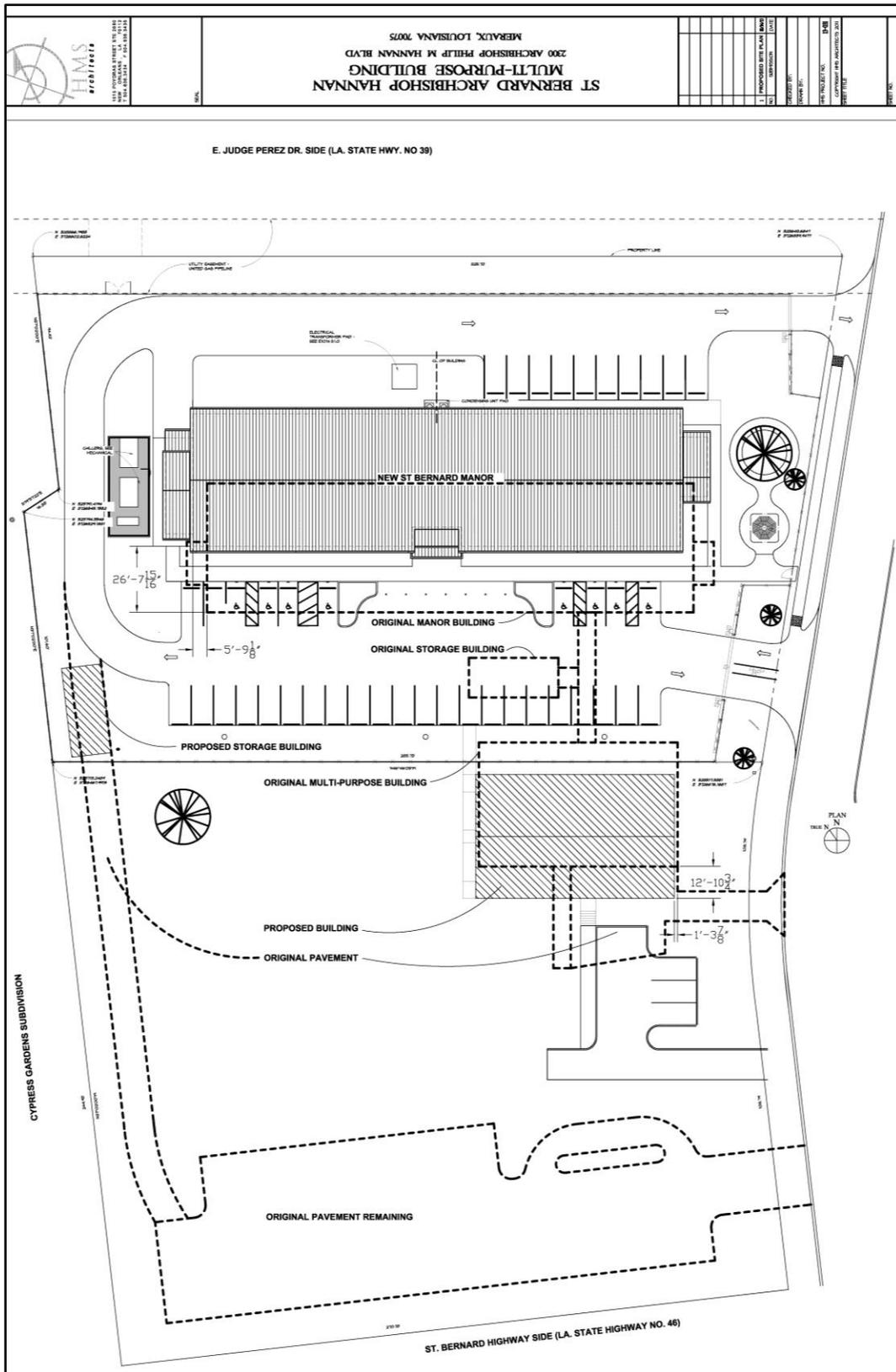


Figure 6: St. Bernard Manor-proposed site layout of multi-purpose building and maintenance building at location B

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 subsequent sections. Definitions of impact intensity are described below:

Negligible: The resource area (e.g., geology) would either not be affected changes would be non-detectable, or if detected, would have effects that would be slight and local. Impacts would be well below regulatory standards, as applicable. Effects to Cultural Resources would be either non-existent, i.e., a building is less than 50 years old and/or no known archeological sites are present on the site, or the project is determined not likely to affect and SHPO/Tribal Historic Preservation Officer (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. Effects to Cultural Resources are not likely, i.e., building is at least 50 years old and/or known archeological sites are near the project area, but special conditions/mitigation are sufficient to maintain the “not likely to affect 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 would be altered on a short-term basis. Mitigation measures would be necessary to reduce any potential adverse effects. Effects 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 at least local 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, although long-term changes to the resource would be expected. Effects to Cultural Resources are likely, i.e., building is at least 50 years old and/or known archeological sites are in the project area. Impacts would have substantial consequences on a local and regional level.

Table 1 - Affected Environment and Environmental Consequences Matrix: Preferred Alternative: Construct a New Multipurpose Building in a Different Footprint and Construct a New Maintenance Facility in a New Location A

Resource Area	Impact Negligible	Impact Minor	Impact Moderate	Impact Major	Impact Summary	Agency Coordination / Permits	Mitigation
Geology and Soils	X				Potential for short-term localized increase in soil erosion during construction. Per review of the National Resources Conservation Service (NRCS) Web Soil Survey, soils located on the proposed project area (Cancienne silty clay loam) are classified as prime farmland; however, the project site is "already in" urban development per the Farmland Protection Policy Act (FPPA) (i.e., land with a density of 30 structures per 40 acre area, lands identified as "urbanized area" on the Census Bureau Map, or lands identified as urban area mapped with "tint overprint" on USGS topographical maps, (USDA, 1984); and does not meet the definition of farmland found in the FPPA and the implementing regulations.		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.

Resource Area	Impact Negligible	Impact Minor	Impact Moderate	Impact Major	Impact Summary	Agency Coordination / Permits	Mitigation
Hydrology and Floodplains (Executive Order 11988)	X				<p>The applicant intends to construct a new multipurpose building in a different footprint and construct a new maintenance facility in a new location A at 2440 Archbishop Philip M. Hanan Boulevard in St. Bernard Parish, Louisiana, which is located within Flood Zone "Shaded X", areas of 0.2% annual chance flood; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1% annual chance flood, according to Preliminary DFIRM panel 22087C0491D, dated November 9, 2012.</p>	<p>Preliminary DFIRM 22087C0491D</p>	<p>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 shall 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 Base Flood Elevation (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 would 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 6.0</p>

Resource Area	Impact Negligible	Impact Minor	Impact Moderate	Impact Major	Impact Summary	Agency Coordination / Permits	Mitigation
Wetlands (Executive Order 11990)	X				U.S. Fish and Wildlife Service (USFWS)-mapped wetlands are not present in the proposed project area.	U.S. Environmental Protection Agency (USEPA) Solicitation response letter dated 1/9/14 (See Appendix C)	
Surface Water and Water Quality	X				Project would entail construction of buildings on previously developed land. Potential for short-term localized increase in sedimentation during construction. Long term, post-Construction runoff would not increase because the impervious surface area would be similar to the pre-disaster site conditions.	Louisiana Department of Environmental Quality (LDEQ) email dated 3/3/14. U.S. Army Corps of Engineers (USACE) letter dated 2/13/14 (See Appendix C)	Implement construction BMPs, install silt fences/straw bales to reduce sedimentation. All practicable 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 (1) acre. The applicant is to contact the LDEQ Water Permits Division at (225) 219-3181 to determine if the proposed project requires a permit. See also Section 6.0.
Groundwater	X				The project site does not overlie a Sole Source Aquifer. The project is not expected to affect groundwater.	USEPA letter dated 1/9/14 NEPAssist-EPA (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 of the site.		

Resource Area	Impact Negligible	Impact Minor	Impact Moderate	Impact Major	Impact Summary	Agency Coordination / Permits	Mitigation
Coastal Resources	X				According to the Louisiana Department of Natural Resources (LDNR), the project site is located within the Louisiana Coastal Zone and would require a Coastal Use Permit (CUP). The project is not located within the Coastal Barrier Resource System (CBRS).	LDNR response letter dated 1/14/14 (See Appendix C) Preliminary DFIRM 22 087C 0491 D (for CBRS)	The applicant is responsible for coordinating with and obtaining any required permit(s) from the LDNR Coastal Management Division (CMD) 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.

Resource Area	Impact Negligible	Impact Minor	Impact Moderate	Impact Major	Impact Summary	Agency Coordination / Permits	Mitigation
Air Quality	X				<p>The EPA 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) (EPA, 2013); and has designated specific areas as NAAQS attainment or non-attainment areas (NAAs). 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. The General Conformity Rule (GCR) currently applies to all Federal actions that are taken in designated non-attainment or maintenance areas, with the following exceptions: (1) actions covered by the transportation conformity rule; (2) actions with associated emissions clearly at or below specified <i>de minimis</i> levels; (3) actions listed as exempt in the rule; or, (4) actions covered by a Presumed-to-Conform approved list. 40 C.F.R. § 93.153(c). When the total direct and indirect emissions from the project or action are clearly below the <i>de minimis</i> levels, the project or action would not be subject to a conformity determination, and may proceed. 40 C.F.R §§93.153(b) and (c). If, on the other hand, emissions are equal to or exceed 40 C.F.R. §93.153 or Louisiana Administrative Code (LAC) 33:III.1405.B <i>de minimis</i> levels, a general conformity determination must be made by the Federal agency involved. LDEQ requests a “general conformity applicability determination” in order to demonstrate that a formal general conformity determination is not required. Project-associated emissions</p>	LDEQ email dated 3/3/14. (See Appendix C)	<p>The contractor shall be responsible for implementing BMPs to reduce fugitive dust generation and emission criteria pollutants. BMPs would include watering down construction areas when necessary to minimize particulate matter and dust, keeping fuel-burning equipment running times at a minimum, maintaining and covering spoil piles, covering the loads of haul vehicles, and keeping construction equipment properly tuned and maintained. Long term emissions associated with the reconstructed facility, such as those generated by small engines used for lawn maintenance and offsite generation of electrical power, are expected to be minor and comparable to emissions generated by the previously existing facilities. See also Section 6.0.</p>
St. Bernard Manor- Draft Environmental Assessment							

Resource Area	Impact Negligible	Impact Minor	Impact Moderate	Impact Major	Impact Summary	Agency Coordination / Permits	Mitigation
Vegetation and Wildlife	X				The proposed project is located in an area which is developed with commercial and residential properties with no natural vegetation stands present. Therefore, Impacts to the overall vegetation and wildlife in the area would be negligible.	Louisiana Department of Wildlife and Fisheries (LDWF) determination of no effect, dated 1/10/14. (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 1/10/14 (See Appendix C) LDWF letter dated 1/10/14. (See Appendix C)	

Resource Area	Impact Negligible	Impact Minor	Impact Moderate	Impact Major	Impact Summary	Agency Coordination / Permits	Mitigation
Cultural Resources (National Historic Preservation Act Section 106)	X				The proposed undertaking would utilize FEMA funding to construct a new multi-purpose building and maintenance facility at 2440 Archbishop Philip M Hannan Blvd, Meraux, Louisiana. In a consultation dated 12/14/2007, FEMA determined that the demolition and rebuild of the entire Archbishop Hannan Senior Center Complex (aka, St. Bernard Manor) would have no effect to historic properties. State Historic Preservation Office (SHPO) concurrence with this determination was received dated 12/27/2007. The applicant must comply with the NHPA conditions set forth in this determination.	FEMA submitted a finding of No Historic Properties Affected to SHPO. SHPO concurrence with FEMA's determination was received dated December 27, 2007. 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 would in turn contact FEMA Historic Preservation staff. The applicant would not proceed with work until FEMA Historic Preservation completes consultation with the SHPO. See also Section 6.0.

Resource Area	Impact Negligible	Impact Minor	Impact Moderate	Impact Major	Impact Summary	Agency Coordination / Permits	Mitigation
Environmental Justice (Executive Order 12898)/Socioeconomics	X				According to the 2010 U.S. Census Demographic Profile of the area 0.5 miles around the project site: the total population is 1,426 with 81% White, 11% Black, and 9% Hispanic. The median household income in St. Bernard Parish is \$40,590 and 15.6% of the population is below poverty level. This project is to restore low-income senior housing which would benefit the community and surrounding populations by providing housing for citizens who may not be able to afford this essential need otherwise.	NEPAssist-USEPA U.S. Census Bureau, American Fact Finder, Data for St. Bernard Parish, Louisiana	
Resource Recovery and Conservation Act (RCRA)	X				Project involves constructing new buildings on the site. All debris must be disposed of in an approved landfill.	LDEQ email dated 3/3/14 (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 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
Noise	X				Noise levels would slightly increase during construction. Noise receptive areas are nearby.		St. Bernard Parish 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 9 P.M. Construction activities should be limited to this schedule on weekdays See also Section 6.0.

Resource Area	Impact Negligible	Impact Minor	Impact Moderate	Impact Major	Impact Summary	Agency Coordination / Permits	Mitigation
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 and other construction hazards. 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 (OSHA) 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				The work would take place on ANO's property; the only anticipated traffic impacts would be due to construction materials and equipment accessing the site. Traffic volumes along the access arteries would increase temporarily during work activities.		Appropriate signage and barriers should be in place prior to imitating 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 Negligible	Impact Minor	Impact Moderate	Impact Major	Impact Summary	Agency Coordination / Permits	Mitigation
Hazardous Materials and Toxic Wastes	X				Per NEPAassist database search, there is one (1) Toxic Release Inventory site located within 0.5 miles of the site. The database also revealed eight (8) hazardous waste (RCRA) facilities within 0.5 miles of the site. No Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) or Louisiana State Brownfield (LSB) sites were listed. LDEQ was contacted and it was determined no impacts related to hazardous materials and wastes are anticipated.	LDEQ email dated 3/3/14 (See Appendix C) NEPAassist-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 and prevent any toxic runoff. See also Section 6.0.

Table 2 - Affected Environment and Environmental Consequences Matrix: Alternative Three (3): Construct a New Multipurpose Building in a Different Footprint and Construct a New Maintenance Facility in a New Location B

Resource Area	Impact Negligible	Impact Minor	Impact Moderate	Impact Major	Impact Summary	Agency Coordination / Permits	Mitigation
Geology and Soils	X				<p>Potential for short-term localized increase in soil erosion during construction.</p> <p>Per review of the National Resources Conservation Service (NRCS) Web Soil Survey, soils located on the proposed project area (Cancienne silty clay loam) are classified as prime farmland; however, the project site is “already in” urban development per the Farmland Protection Policy Act (FPPA) (i.e., land with a density of 30 structures per 40 acre area, lands identified as “urbanized area” on the Census Bureau Map, or lands identified as urban area mapped with “tint overprint” on USGS topographical maps, (USDA, 1984); and does not meet the definition of farmland found in the FPPA and the implementing regulations.</p>		<p>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.</p>

Resource Area	Impact Negligible	Impact Minor	Impact Moderate	Impact Major	Impact Summary	Agency Coordination / Permits	Mitigation
Hydrology and Floodplains (Executive Order 11988)	X				The applicant intends to construct a new multipurpose building in a different footprint and construct a new maintenance facility in a new location B at 2440 Archbishop Philip M. Hanan Boulevard in St. Bernard Parish, Louisiana, which is located within Flood Zone "Shaded X", areas of 0.2% annual chance flood; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1% annual chance flood, according to Preliminary DFIRM panel 22087C0491D, dated November 9, 2012.	Preliminary DFIRM 22087C0491D	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 shall 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 Base Flood Elevation (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 would 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 6.0
Wetlands (Executive Order 11990)	X				U.S. Fish and Wildlife Service (USFWS)-mapped wetlands are not present in the proposed project area.	U.S. Environmental Protection Agency (USEPA) Solicitation response letter dated 1/9/14 (See Appendix C)	

Resource Area	Impact Negligible	Impact Minor	Impact Moderate	Impact Major	Impact Summary	Agency Coordination / Permits	Mitigation
Surface Water and Water Quality	X				Project would entail construction of buildings on previously developed land. Potential for short-term localized increase in sedimentation during construction. Long term, post-Construction runoff would not increase because the impervious surface area would be similar to the pre-disaster site conditions.	Louisiana Department of Environmental Quality (LDEQ) email dated 3/3/14. U.S. Army Corps of Engineers (USACE) letter dated 2/13/14 (See Appendix C)	Implement construction BMPs, install silt fences/straw bales to reduce sedimentation. All practicable 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 (1) acre. The applicant is to contact the LDEQ Water Permits Division at (225) 219-3181 to determine if the proposed project requires a permit. See also Section 6.0.
Groundwater	X				The project site does not overlie a Sole Source Aquifer. The project is not expected to affect groundwater.	USEPA letter dated 1/9/14 NEPAssist-EPA (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 of the site.		
Coastal Resources	X				According to the Louisiana Department of Natural Resources (LDNR), the project site is located within the Louisiana Coastal Zone and would require a Coastal Use Permit (CUP). The project is not located within the Coastal Barrier Resource System (CBRS).	LDNR response letter dated 1/14/14 (See Appendix C) Preliminary DFIRM 22 087C 0491 D (for CBRS)	The applicant is responsible for coordinating with and obtaining any required permit(s) from the LDNR Coastal Management Division (CMD) 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.

Resource Area	Impact Negligible	Impact Minor	Impact Moderate	Impact Major	Impact Summary	Agency Coordination / Permits	Mitigation
Air Quality	X				<p>The EPA 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) (EPA, 2013); and has designated specific areas as NAAQS attainment or non-attainment areas (NAAs). 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. The General Conformity Rule (GCR) currently applies to all Federal actions that are taken in designated non-attainment or maintenance areas, with the following exceptions: (1) actions covered by the transportation conformity rule; (2) actions with associated emissions clearly at or below specified <i>de minimis</i> levels; (3) actions listed as exempt in the rule; or, (4) actions covered by a Presumed-to-Conform approved list. 40 C.F.R. § 93.153(c). When the total direct and indirect emissions from the project or action are clearly below the <i>de minimis</i> levels, the project or action would not be subject to a conformity determination, and may proceed. 40 C.F.R. §§93.153(b) and (c). If, on the other hand, emissions are equal to or exceed 40 C.F.R. §93.153 or Louisiana Administrative Code (LAC) 33:III.1405.B <i>de minimis</i> levels, a general conformity determination must be made by the Federal agency involved. LDEQ requests a “general conformity applicability determination” in order to demonstrate that a formal general conformity determination is not required. Project-associated emissions are quantified using (1) direct emissions, and (2) indirect emissions within the scope of the Federal agency’s authority. See 40 C.F.R. § 93.158(a). St. Bernard Parish is classified by the EPA as an NAAQS non-attainment area for the criteria pollutant sulfur dioxide (SO₂) per the Clean Air Act (CAA). Minor impacts to air quality would be anticipated from movement of heavy equipment during demolition, excavation and construction activities. The effects would be localized and of short duration. Compliance with the CAA NAAQS has been fully coordinated with the Air Quality Section of the LDEQ. An air quality determination for emissions from the proposed Federal action was made using methods described in LAC 33:III.1411. Therefore, the analysis was based upon direct emissions for estimated construction hours. FEMA’s air quality analysis for the proposed project resulted in a finding of anticipated SO₂ emissions of no more than 0.0007459 tons, while the <i>de minimis</i> threshold is 100 tons/yr. (See Appendix C). This project meets exception two (2) above and therefore no further action is required.</p>	LDEQ email dated 3/3/14. (See Appendix C)	The contractor shall be responsible for implementing BMPs to reduce fugitive dust generation and emission criteria pollutants. BMPs would include watering down construction areas when necessary to minimize particulate matter and dust, keeping fuel-burning equipment running times at a minimum, maintaining and covering spoil piles, covering the loads of haul vehicles, and keeping construction equipment properly tuned and maintained. Long term emissions associated with the reconstructed facility, such as those generated by small engines used for lawn maintenance and offsite generation of electrical power, are expected to be minor and comparable to emissions generated by the previously existing facilities. See also Section 6.0.
St. Bernard	Manor- Draft Environmental Assessment						

Resource Area	Impact Negligible	Impact Minor	Impact Moderate	Impact Major	Impact Summary	Agency Coordination / Permits	Mitigation
Vegetation and Wildlife	X				The proposed project is located in an area which is developed with commercial and residential properties with no natural vegetation stands present. Therefore, Impacts to the overall vegetation and wildlife in the area would be negligible.	Louisiana Department of Wildlife and Fisheries (LDWF) determination of no effect, dated 1/10/14. (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 1/10/14 (See Appendix C) LDWF letter dated 1/10/14. (See Appendix C)	

Resource Area	Impact Negligible	Impact Minor	Impact Moderate	Impact Major	Impact Summary	Agency Coordination / Permits	Mitigation
Cultural Resources (National Historic Preservation Act Section 106)	X				The proposed undertaking would utilize FEMA funding to construct a new multi-purpose building and maintenance facility at 2440 Archbishop Philip M Hannan Blvd, Meraux, Louisiana. In a consultation dated 12/14/2007, FEMA determined that the demolition and rebuild of the entire Archbishop Hannan Senior Center Complex (aka, St. Bernard Manor) would have no effect to historic properties. State Historic Preservation Office (SHPO) concurrence with this determination was received dated 12/27/2007. The applicant must comply with the NHPA conditions set forth in this determination.	FEMA submitted a finding of No Historic Properties Affected to SHPO. SHPO concurrence with FEMA's determination was received dated December 27, 2007. 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 would in turn contact FEMA Historic Preservation staff. The applicant would not proceed with work until FEMA Historic Preservation completes consultation with the SHPO. See also Section 6.0.
Environmental Justice (Executive Order 12898)/Socioeconomic s	X				According to the 2010 U.S. Census Demographic Profile of the area 0.5 miles around the project site: the total population is 1,426 with 81% White, 11% Black, and 9% Hispanic. The median household income in St. Bernard Parish is \$40,590 and 15.6% of the population is below poverty level. This project is to restore low-income senior housing which would benefit the community and surrounding populations by providing housing for citizens who may not be able to afford this essential need otherwise.	NEPAssist-USEPA U.S. Census Bureau, American Fact Finder, Data for St. Bernard Parish, Louisiana	

Resource Area	Impact Negligible	Impact Minor	Impact Moderate	Impact Major	Impact Summary	Agency Coordination / Permits	Mitigation
Resource Recovery and Conservation Act (RCRA)	X				Project involves constructing new buildings on the site. All debris must be disposed of in an approved landfill.	LDEQ email dated 3/3/14 (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 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
Noise	X				Noise levels would slightly increase during construction. Noise receptive areas are nearby.		St. Bernard Parish 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 9 P.M. Construction activities should be limited to this schedule on weekdays 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 and other construction hazards. 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.

Resource Area	Impact Negligible	Impact Minor	Impact Moderate	Impact Major	Impact Summary	Agency Coordination / Permits	Mitigation
Traffic and Transportation	X				The work would take place on ANO's property; the only anticipated traffic impacts would be due to construction materials and equipment accessing the site. Traffic volumes along the access arteries would increase temporarily during work activities.		Appropriate signage and barriers should be in place prior to initiating 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.
Hazardous Materials and Toxic Wastes	X				Per NEPAassist database search, there is one (1) Toxic Release Inventory site located within 0.5 miles of the site. The database also revealed eight (8) hazardous waste (RCRA) facilities within 0.5 miles of the site. No Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) or Louisiana State Brownfield (LSB) sites were listed. LDEQ was contacted and it was determined no impacts related to hazardous materials and wastes are anticipated.	LDEQ email dated 3/3/14 (See Appendix C) NEPAassist-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 and prevent any toxic runoff. See also Section 6.0.

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 is located at 2440 Archbishop Philip M Hannan Blvd, Meraux, Louisiana, within the 70075 zip code geographic area (Figure 7). FEMA has determined that the area within a 0.5 mile radius of the site constitutes an appropriate project impact zone, and the larger geographic area consisting of the 70075 zip code constitutes an

appropriate boundary for a cumulative impact analysis of the proposed action and alternatives.

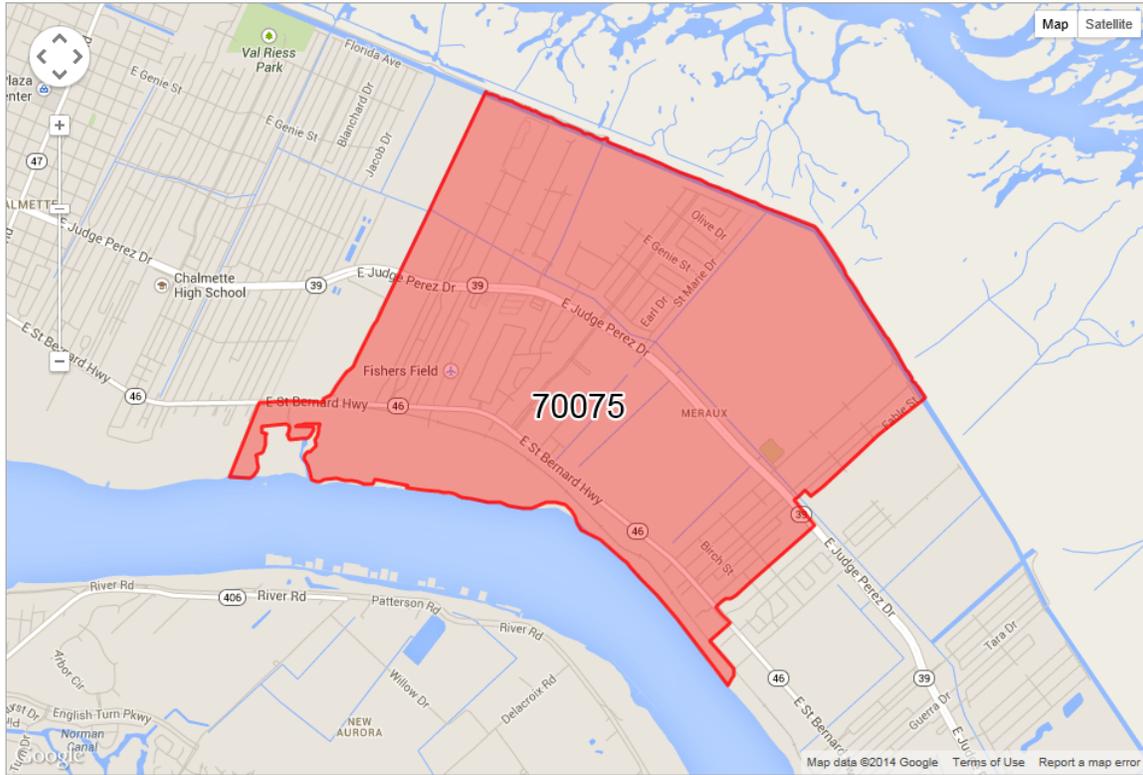


Figure 7: Boundary map for the 70075 zip code geographic area

In accordance with NEPA, and to the extent reasonable and practicable, this EA considered the combined effects of the Proposed Action Alternative, as well as 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 their proposed actions and the effects of completed and ongoing actions, and to determine whether the incremental impact of the 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 March 2014, within the 70075 geographic area, approximately 72 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) to buildings, roads and bridges, recreational and educational facilities, public utilities, waterways, and more (Figure 8). All FEMA funded actions are subject 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.

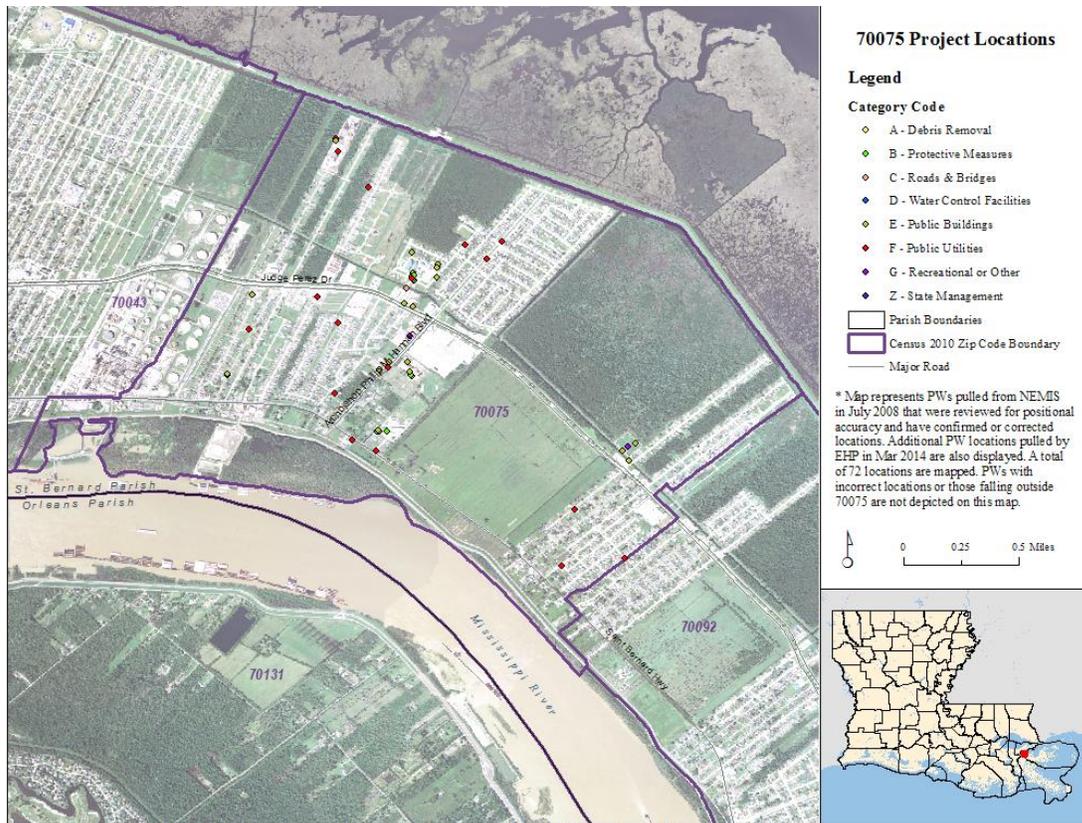


Figure 8: FEMA-funded projects occurring within the 70075 zip code

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 this EA previously described 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, is 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, both Katrina and

Rita, 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 housing facilities, thus attracting more residents to return home. Considered in relation to past, present, and reasonably foreseeable future actions, the cumulative impact of the proposed action to the built and natural environment would be minimal, would be beneficial rather than detrimental, and is not expected to contribute to any adverse effects or to otherwise significantly affect the human environment.

6.0 CONDITIONS AND MITIGATION MEASURES

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 must implement construction BMPs; including installation of silt fences/straw bales to reduce sedimentation. Area soils must be covered and/or wetted during construction. If fill is stored on site as part of unit installation or removal, the contractor is required to appropriately cover it. Construction contractor is required to obtain applicable LPDES permit, and implement a stormwater pollution prevention plan.
- The applicant must contact the LDEQ Water Permits Division at (225) 219-3181 to determine if the proposed project requires a permit.
- The applicant is responsible for coordinating with and obtaining any required permit(s) from the LDNR CMD 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 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 must be observed to control nonpoint source pollution from construction activities.
- The contractor shall be responsible for implementing BMPs to reduce fugitive dust generation and emission criteria pollutants. BMPs would include watering

down construction areas when necessary to minimize particulate matter and dust, keeping fuel-burning equipment running times at a minimum, maintaining and covering spoil piles, covering the loads of haul vehicles, and keeping construction equipment properly tuned and maintained.

- All precautions must be observed to protect the groundwater of the region.
- The applicant must contact the LDEQ Water Permits division to determine if special water quality-based limitations are applicable.
- If any solid or hazardous wastes, or soils and/or groundwater contaminated with hazardous constituents are encountered during implementation of the project, notification to LDEQ's SPOC at (225) 219-3640 is required. Additionally, precautions must be taken to protect workers from these hazardous constituents.
- Appropriate signage and barriers must be in place prior to construction activities in order to alert pedestrians and motorists of project activities and traffic pattern changes, and to minimize potential adverse public safety concerns.
- 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 must be initiated in accordance with applicable Federal, state, and local regulations. The contractor is required to take appropriate measures to prevent, minimize, and control the spill of hazardous materials in the construction area or any offsite runoff.
- The contractor must implement traffic control measures, as necessary.
- To minimize worker and public health and safety risks from project construction and closure, all construction and closure work must be done using qualified personnel trained in the proper use of construction equipment, including all appropriate safety precautions. Additionally, all activities must be conducted in a safe manner in accordance with the standards specified in OSHA regulations and the USACE safety manual.
- 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 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 Public Assistance contacts at FEMA, who will in turn contact FEMA Historic Preservation staff. The applicant will not proceed with work until FEMA HP completes consultation with the SHPO.
- 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 shall 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.

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 St. Bernard Voice edition August 1 and August 8, 2014. Additionally the Environmental Assessment was made available at the St. Bernard Parish Library- Main Branch. The Environmental Assessment was published on FEMA's websites. A copy of the Public Notice is attached in Appendix D.

8.0 AGENCY COORDINATION

U.S 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

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