

Draft Environmental Assessment
Paul S. Morton Scholarship Foundation
Change of Location Alternate Project
Orleans Parish, Louisiana

August 2014

U.S. Department of Homeland Security
Federal Emergency Management Agency, Region VI
Louisiana Recovery Office
1100 Robert E. Lee Boulevard
New Orleans, Louisiana 70112



FEMA

<u>SECTION</u>	<u>PAGE</u>
TABLE OF CONTENTS	i
LIST OF TABLES	ii
LIST OF FIGURES	ii
LIST OF APPENDICES	iii
ACRONYMS AND ABBREVIATIONS	iv
1.0 INTRODUCTION	1
1.1 Project Authority	1
1.2 Area Description	3
1.3 Site Description	7
2.0 PURPOSE AND NEED FOR THE PROPOSED ACTION	7
3.0 ALTERNATIVES CONSIDERED	8
3.1 Alternative 1 – No Action	8
3.2 Alternative 2 – Repair Damaged Facility to Pre-Disaster Condition	8
3.3 Alternative 3 – Purchase, Renovate, and Relocate to an Alternate Site	8
4.0 AFFECTED ENVIRONMENT AND ALTERNATIVES ANALYSIS	11
4.1 Geology and Soils	11
4.1.1 Regulatory Setting	11
4.1.2 Existing Conditions	11
4.1.3 Environmental Consequences	14
4.2 Waters of the United States and Wetlands	15
4.2.1 Regulatory Setting	15
4.2.2 Existing Conditions	16
4.2.3 Environmental Consequences	18
4.3 Floodplains	19
4.3.1 Regulatory Setting	19
4.3.2 Existing Conditions	20
4.3.3 Environmental Consequences	23
4.4 Coastal Resources	24
4.4.1 Regulatory Setting	24
4.4.2 Existing Conditions	25
4.4.3 Environmental Consequences	25
4.5 Federally Protected Species and Critical Habitats	26
4.5.1 Regulatory Setting	26
4.5.2 Existing Conditions	26
4.5.3 Environmental Consequences	27
4.6 Air Quality	28
4.6.1 Regulatory Setting	28
4.6.2 Existing Conditions	28
4.6.3 Environmental Consequences	28
4.7 Noise	29
4.7.1 Regulatory Setting	29
4.7.2 Existing Conditions	30
4.7.3 Environmental Consequences	30
4.8 Traffic	31
4.8.1 Regulatory Setting	31
4.8.2 Existing Conditions	31

4.8.3	Environmental Consequences	32
4.9	Environmental Justice	33
4.9.1	Regulatory Setting	33
4.9.2	Existing Conditions	33
4.9.3	Environmental Consequences	33
4.10	Hazardous Materials	34
4.10.1	Regulatory Setting	34
4.10.2	Existing Conditions	35
4.10.3	Environmental Consequences	35
4.11	Cultural Resources	36
4.11.1	Regulatory Setting	36
4.11.2	Existing Conditions	36
4.11.3	Environmental Consequences	37
5.0	CUMULATIVE IMPACTS	39
6.0	CONDITIONS AND MITIGATION MEASURES	43
7.0	PUBLIC INVOLVEMENT AND AGENCY CONSULTATION	46
8.0	LIST OF PREPARERS	47
9.0	REFERENCES	48

LIST OF TABLES

Table 1	– Federally Listed Species Known to Occur in Orleans Parish	27
Table 2	– Summary of FEMA’s NRHP Eligibility Determinations	37
Table 3	– Projects that May Have the Potential to Contribute to Cumulative Impacts	42

LIST OF FIGURES

1.	Project Vicinity Map	2
2.	Greater St. Stephen Christian Academy	3
3.	Change of Location Showing Former Location and Proposed New Site	4
4.	Aerial View of Proposed Project Location	5
5.	Topographic Map View of Proposed Project Site	6
6.	Aerial View of Proposed Action Site Layout	10
7.	Generalized Geologic Map of Louisiana	12
8.	NRCS Web Soil Survey Mapper	13
9.	NRCS Web Soil Survey Legend	14
10.	NRCS Classification Summary for Proposed Project Site	14
11.	ABFE Map LA-CC31	22
12.	Orleans Parish Preliminary DFIRM Map Panel Number 22071C0229F	23
13.	Louisiana Coastal Zone Boundary Map	25
14.	Traffic Layout Map	32
15.	Boundary Map for the 70113 Zip Code Geographic Area	40
16.	FEMA-Funded Projects Occurring Within the 70113 Zip Code	41

LIST OF APPENDICES

Appendix A	Site Photographs	52
Appendix B	Floodplain and Wetland 8-Step Planning Documentation	55
Appendix C	Public Notice/FONSI	62
Appendix D	Project Plans	70
Appendix E	Agency Correspondence	81

ACRONYMS AND ABBREVIATIONS

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

NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service
NO ₂	Nitrogen Dioxide
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NRCS	Natural Resources Conservation Service
NWI	National Wetlands Inventory
O ₃	Ozone
OCM	Office of Coastal Management
OPA	Otherwise Protected Area
PA	Programmatic Agreement
PA	Public Assistance
Pb	Lead
PCB	Polychlorinated Biphenyls
PM _{2.5}	Particulate Matter Less Than 2.5 Micrometers in Diameter
PM ₁₀	Particulate Matter Less Than 10 Micrometers in Diameter
PNP	Private Non-Profit
PSMSF	Paul S. Morton Scholarship Foundation
RCRA	Resource Conservation and Recovery Act
RHA	Rivers and Harbors Act
SELA	Southeastern Louisiana
SFHA	Special Flood Hazard Area
SHPO	State Historic Preservation Office/Officer
SO ₂	Sulfur Dioxide
sq ft	Square Feet
sq mi	Square Miles
SWPPP	Stormwater Pollution Prevention Plan
TMDL	Total Maximum Daily Load
TSCA	Toxic Substances Control Act
U.S.	United States
USACE	United States Army Corps of Engineers
USC	United States Code
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey

1.0 INTRODUCTION

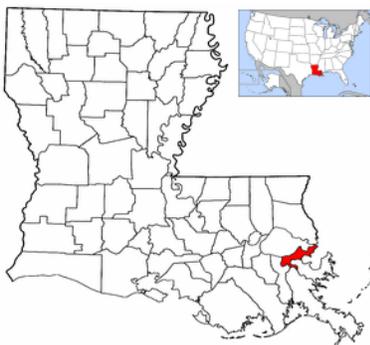
1.1 Project Authority

Hurricane Katrina made landfall on August 29, 2005, near Buras, Louisiana (LA) as a Category 3 storm. Maximum sustained winds at landfall were estimated at 125 miles per hour and were accompanied by a strong and damaging storm surge well above normal high tide. President George W. Bush declared a major disaster for the State of Louisiana and signed a major disaster declaration (FEMA-1603-DR-LA) on the same day, authorizing the Department of Homeland Security's Federal Emergency Management Agency (FEMA) to provide federal assistance in designated areas of Louisiana.

The Applicant (Paul S. Morton Scholarship Foundation or PSMSF) has requested, through the State of Louisiana Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP) that FEMA provide disaster assistance through the provision of federal grant funding pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), PL 93-288, as amended. Section 406 of the Stafford Act authorizes FEMA's Public Assistance (PA) Program to fund projects to repair, restore, and replace facilities damaged as a result of the declared event. The Applicant has determined that repair of the damaged facilities to their pre-Katrina specifications would not be in the best interest of the community. Consequently, in accordance with 44 Code of Federal Regulations (CFR) Section 206.203(d), the PSMSF has requested a Change of Location Alternate Project. The application of eligible funding to repair or expand other public facilities, or construct a new-use facility, or purchase capital equipment or perform hazard mitigation measures unrelated to the original facility, are considered Alternate Projects.

In accordance with 44 CFR, Chapter 1, Part 10.9, an Environmental Assessment (EA) is being prepared in compliance with Section 102 of the National Environmental Policy Act (NEPA) of 1969, as implemented by the regulations promulgated by the President's Council on Environmental Quality (40 C.F.R. Sections 1500-1508). This Environmental Assessment (EA) will determine if the proposed Change of Location Alternate Project will have the potential for significant adverse effects on the quality of the human and natural environment. The results of this EA will be used to make a decision whether to initiate preparation of an Environmental Impact Statement or to prepare a Finding of No Significant Impact (FONSI).

1.2 Area Description



Orleans Parish lies in southeastern Louisiana and is bounded by Lake Pontchartrain on the north, St. Tammany Parish on the north, Lake Borgne on the east, St. Bernard Parish and Plaquemines Parish on the southeast, and Jefferson Parish on the south and west. According to the U.S. Census Bureau records, the parish population has been decreased from 627,525 in 1960, 593,471 in 1970, 557,515 in 1980, 496,938 in 1990, to 484,674 in 2000, and to 343,829 in 2010 (U.S. Census 2010).

The normal annual precipitation averages 54 – 58 inches. The climate of the area is subtropical and is strongly influenced by the Gulf of Mexico. Extremes of temperature are seldom experienced and the average temperatures range from an average high of 82.7 degrees Fahrenheit (°F) in July to an average low of 52.6 °F in January.

The parish covers approximately 350.2 square miles, of which 180.5 square miles is land and 169.7 square miles is water (Figure 1). The Parish is traversed by the Mississippi River, the Gulf Intracoastal Waterway, the Inner Harbor Navigation Canal, and the Mississippi River – Gulf Outlet. Orleans Parish is located in a part of the Mississippi River deltaic plain now occupied by the present course of the river. Principal physiographic features of the area are the river channel, natural levee ridges along its banks and along the banks of abandoned distributary channels, and low marshlands situated between and bordering the channels. Land elevations vary from 10.0 feet North America Vertical Datum of 1988 (NAVD88) near the Mississippi River to less than -0.0 feet NAVD88 in the drained coastal marsh area. The crest of the natural levee is the highest ground in the region.

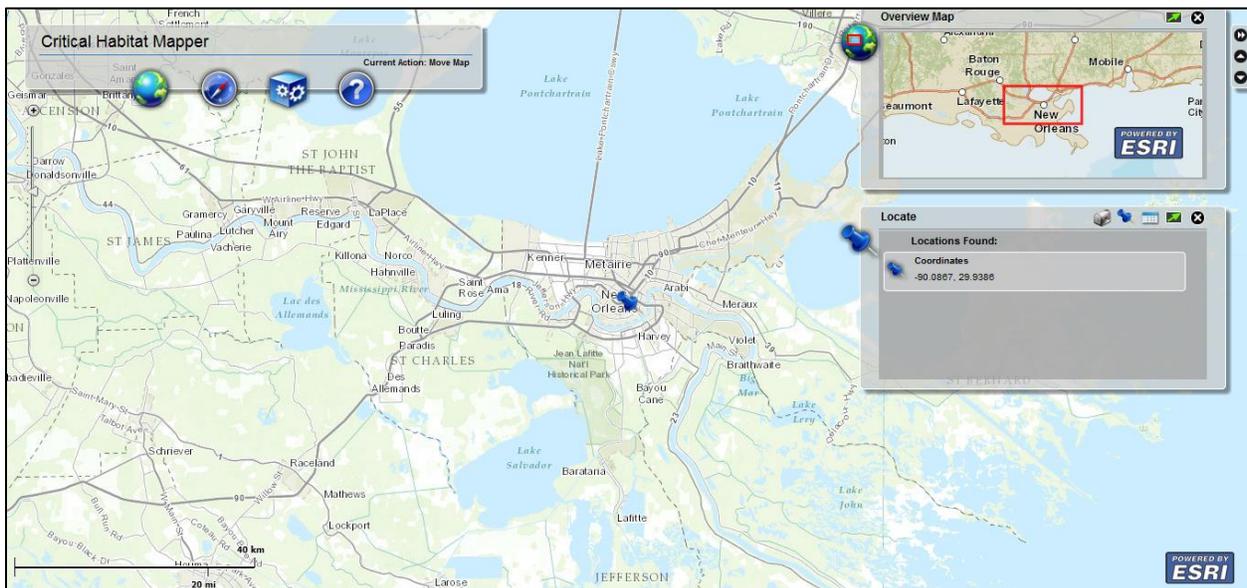


Figure 1 - Project Vicinity Map (ESRI 2014)

The parish is chiefly urban except for the coastal marshes in the eastern part and the area of woodlands on the west bank of the Mississippi River that is known as the Lower Coast. The current trend indicates that urban areas are expanding rapidly and areas of marshes and swamps are decreasing. Vegetation varies from urban and agricultural varieties along the alluvial banks and protected areas to heavily wooded swamp and open marsh classes covering the largest portions of land area within the Parish. Soil conditions in Orleans Parish are sedimentary types ranging from consolidated clays on the higher alluvial banks, to clays and silts in various degrees of liquefactions in open marsh areas.

New Orleans is an industrial and distribution center and the busiest port system in the world by gross tonnage. The Port of New Orleans is the 5th-largest port in the United States based on volume of cargo handled, second-largest in the state after the Port of South Louisiana, and 12th-

largest in the U.S. based on value of cargo. The Port of South Louisiana, also based in the New Orleans area, is the world's busiest in terms of bulk tonnage, and, when combined with the Port of New Orleans, it forms the 4th-largest port system in volume handled. New Orleans is the administrative and financial center of the rich petroleum and natural gas fields of south Louisiana, including "offshore" areas in the Gulf of Mexico (FEMA 2008).

1.3 Site Description

Hurricane Katrina on August 29, 2005, caused flood damages to The Greater St. Stephen Christian Academy campus located at 11110 Lake Forest Boulevard (Figure 2). The area and facility received 7-8 feet of storm surge flooding that remained flooded for 2 weeks. This facility is owned by the Private Non-profit (PNP) applicant, Paul S. Morton Scholarship Foundation. The building was constructed in 1981 and is approximately 43,400 square feet. It is a single-story block wall building with a low slope metal roof design. The primary use of the facility was for educational purposes as defined in FEMA Policy 9521.3, PNP Education. The applicant has provided documentation that verifies the school was approved by the State of Louisiana to provide this function and was active the at the time of the event.



Figure 2 – Greater St. Stephen Christian Academy (Google Earth 2014)

The Christian Academy building consisted of thirty (30) separate rooms used as classrooms, office, library, and lunchroom (approximately 42,000 sq. ft.). At the time of the disaster, the Academy used 14-16 rooms at the west end of the building and had approximately student of sixty (60) students ranging from kindergarten to fifth grade. There were six (6) full time teachers, an administrator, secretary, cafeteria manger, custodian, three (3) support staff, 2-8 parent volunteers, and four (4) college student volunteers. The Applicant has determined that

reconstruction of the educational facility in its current location does not serve the best interests of the community and has, therefore, requested a Change of Location Alternate project (Figure 3). The proposed new PSMSF site is located at 2308 S. Liberty Street and 2224 Philip Street, New Orleans, LA 70113 (Latitude 29.9386, Longitude -90.0867, Figure 4 and Figure 5).



Figure 3 - Change of Location Showing Former Location and Proposed New Site (Google Earth 2014)

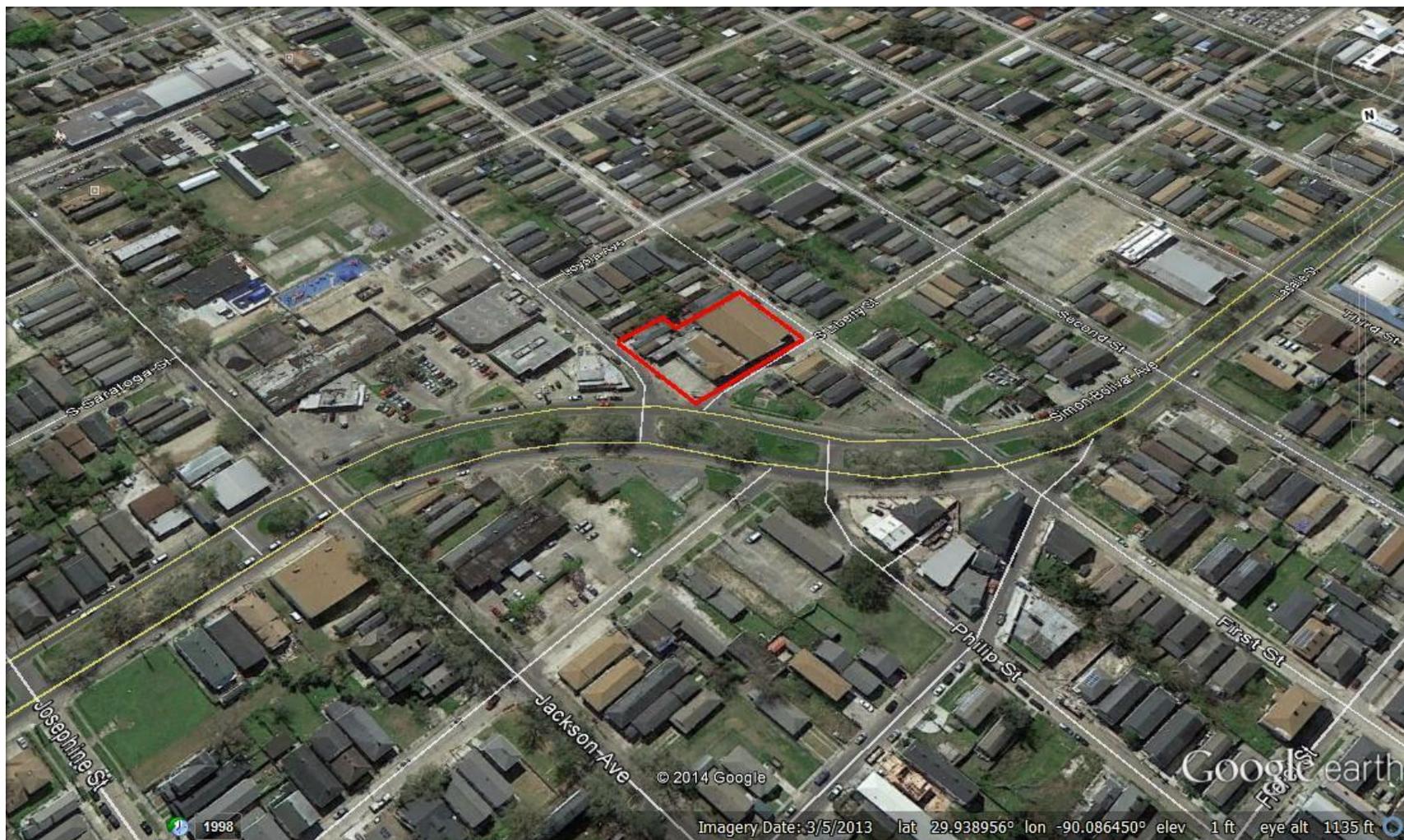


Figure 4 - Aerial View of Proposed Project Location (Google Earth 2014)

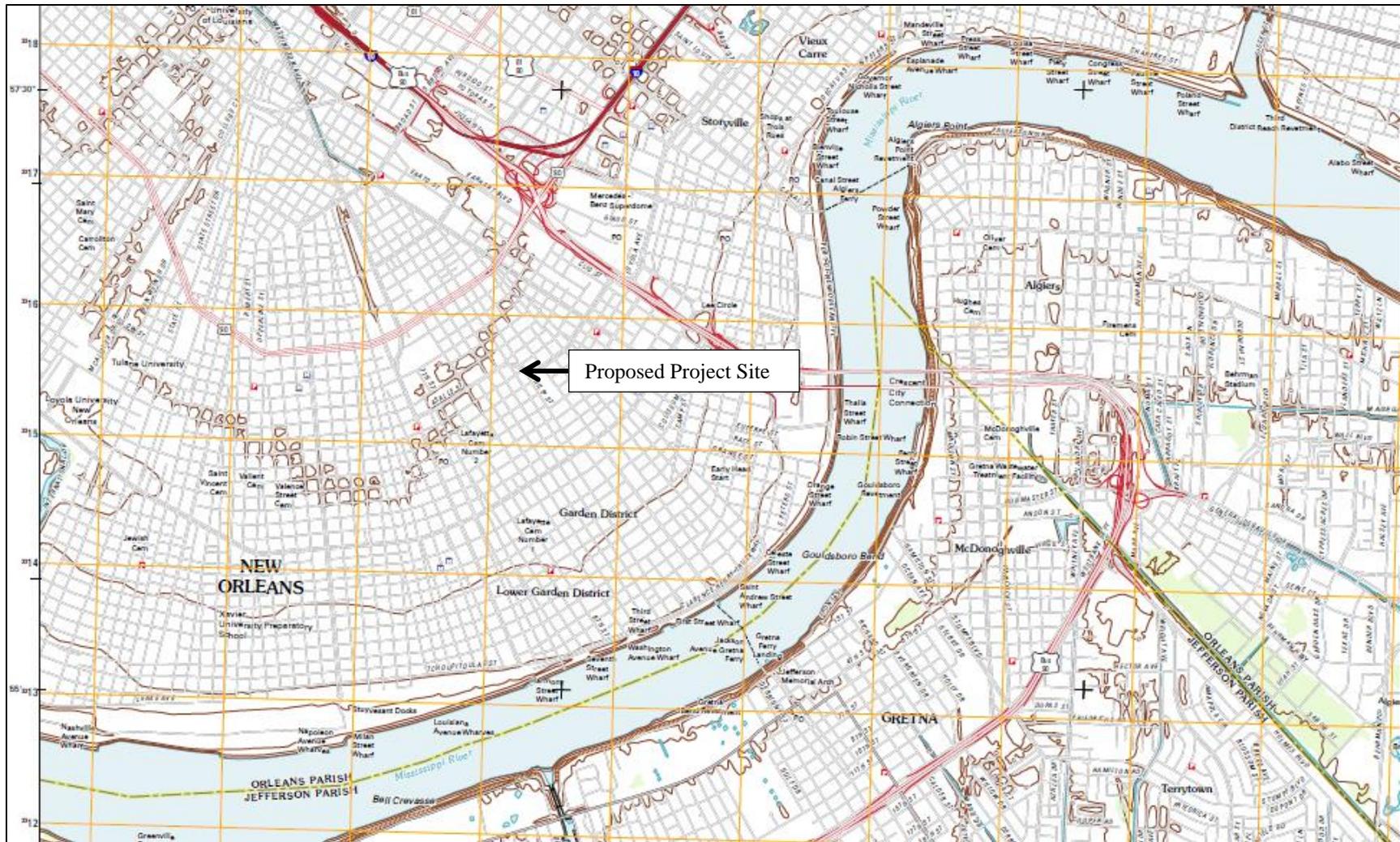


Figure 5 - Topographic Map View of Proposed Project Site (USGS 2012)

2.0 PURPOSE AND NEED FOR THE PROPOSED ACTION

The objective of the PA Program is to provide assistance to state, tribal, and local governments, and certain types of private non-profit organizations, so that communities can quickly respond to and recover from major disasters or emergencies. The mission of the PSMSF's school and community center is to provide support and essential family services to the community (PSMSF 2014). Prior to Hurricane Katrina, the Greater St. Stephen education and administration building was used for a school, office space, and community outreach classes.

Additionally, the facility was also used to administer the PSMSF Scholarship Program. The program is a support service available to families and has two primary objectives: 1) provide a stable environment where children can learn to form bonds with adults other than their primary caregivers and 2) provide primary educational resources for elementary school children (PSMSF 2014).

The Greater St. Stephen facilities suffered damages resulting from Hurricane Katrina and, subsequently, has been sold and demolished. The damage to the PSMSF facilities caused by Hurricane Katrina greatly reduced the Applicant's ability to provide needed services to the local community. Restoration of these services is necessary for the community to fully recover from the impact of the storm. The purpose of this project is to restore and improve community access to quality community and family services. The need for the project is defined by the Applicant's current lack of functioning facilities.

3.0 ALTERNATIVES CONSIDERED

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

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

Three alternatives have been proposed and reviewed for this project. They include: 1) No Action; 2) Repair of the Christian Academy to Pre-Disaster condition; and 3) Purchase, Renovate, and Relocate to existing facilities at an alternate site (Proposed Action).

3.1 Alternative 1 – No Action

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

3.2 Alternative 2 – Repair Damaged Facility to Pre-Disaster Condition

This alternative would repair the damaged Christian Academy to the pre-disaster configuration, function, and capacity in substantially the same footprint in order to restore the facility as it existed prior to Hurricane Katrina. Reconstruction in the same footprint would meet the purpose and need and will therefore be further evaluated.

3.3 Alternative 3 – Purchase, Renovate, and Relocate to an Alternate Site

The applicant proposes to establish the Great Works Life Family Center and Child Care Center at 2308 S. Liberty Street and 2224 Philip Street, by purchasing and renovating 2308 S. Liberty Street (formerly Greater St. Stephen Church) and by purchasing, demolishing, and developing 2224 Philip Street. The facilities will undergo extensive interior and exterior renovations. Architectural plans and drawings have been provided to FEMA, which have been reviewed as part of this EA (Appendix D, Site Plans).



Exterior work includes the removal of vegetation and debris, cleaning and painting of exterior CMU walls, the installation of new soffits, window glazing, security and

landscape lighting, fencing, relocation of the HVAC to the rooftop, installation of a soft surface over the existing parking lot for use as a playground, and installation of a new water line. The interior will be extensively renovated, including all new finish materials, walls, and mechanical, electrical, and plumbing systems. A small elevator will be added on the interior (Figure 6).

In addition to these renovations, the applicant proposes to demolish the former residence located at 2224 Philip Street in order to construct a new grease trap and install a concrete pad for an elevated emergency generator (four feet above closest adjacent grade).

The new facility, known as Greater Works Life Family Center and Child Care Center, would serve as a center for several functions which include, but are not limited to the following:

- Department of Health and Hospitals restaurant-licensed Feeding Center for the poor and hungry including to but not limited to food drives, food bank and food give-a-way programs in partnership with the 2nd Harvesters Bank;
- Greater Works Community Arts Center would offer multipurpose arts programming and/or to provide arts services, art classes, performing art classes, arts administration, and management of public art festivals. This facility would include performance spaces, rehearsals spaces, shared workspace for artists, exhibitions/gallery spaces, classrooms and studios;
- Community services including, but not limited to, organizing neighborhood clean-up projects, local government meetings, forums to reduce crime and unemployment, blood;
- Drives and other similar event/functions;
- Staffed after and before School Tutorial Program for up to 150 participants;
- Certified Drug Counseling Center;
- Certified Marriage and Family Counseling Center;
- Licensed GED programs;
- Community Job Fairs/Work Study Program including, but not limited to, resume writing, interviewing process and employer hiring work programs and events;
- Young Adult Work Study Programs for up to 150 participants;
- Young Adult College Preparation Programs up to 150 participants; and
- Weekly Medical Screening Programs by licensed nurses in conjunction with various local rehab centers as required.



Figure 6 - Aerial View of Proposed Action Site Layout (Google Earth)

4.0 AFFECTED ENVIRONMENT AND ALTERNATIVE ANALYSIS

4.1 Geology and Soils

4.1.1 Regulatory Setting

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

The Natural Resources Conservation Service (NRCS) is responsible for protecting significant agricultural lands from irreversible conversions that result in the loss of essential food or environment sources. For purposes of the FPPA, farmland includes prime farmland, unique farmland, and land of statewide or local importance. Prime farmland is characterized as land with the best physical and chemical characteristics for production of food, feed, forage, fiber and oilseed crops (USDA 2013). Farmland subject to FPPA requirements does not have to be currently used for cropland; it can be forest land, pastureland, cropland, or other land, but not water or built-up land.

4.1.2 Existing Conditions

The parish is entirely within the Mississippi River Delta. The natural levees of the Mississippi River and its distributaries are dominated by firm, loamy and clayey soils. These soils make up about one-third of the total land area of the parish and are developed almost entirely for urban uses. An extensive system of manmade levees protects these soils from flooding. The other two-thirds of the land area of the parish consists of soils formed in marshes and swamps. Most of the area has been protected from flooding by a system of levees and pumps. The unprotected areas are subject to frequent flooding and have a water table at or above the soil surface most of the time. These areas are used as habitat for wetland wildlife and for recreation. Areas protected from flooding are in urban and industrial uses or are being planned and developed for these uses. Elevation ranges from about 12 feet above sea level on the natural levees along the Mississippi River to about 5 feet below sea level in the former marshes and swamps that have been drained. The undrained marshes and swamps, however. Mostly range in elevation from sea level to about 1 foot above sea level.

According to the Louisiana Geological Survey (LGS), the geology in the vicinity of the site is predominantly Holocene Alluvium (Figure 7). The soils in Orleans Parish vary in their potential for major land uses and urban development. According to the USDA, NRCS Web Soil Survey, the soils in the proposed site include Harahan clay and Schreiver clay. Site soils, the Harahan Clay series, consists of poorly drained, very slowly permeable soils that formed in clayey alluvium. These soils are firm in the upper part and slightly fluid in the lower part. They are in

drained, former swamps in the lower part of the Mississippi River flood plain. (Figures 8, 9, and 10, NRCS 2014).

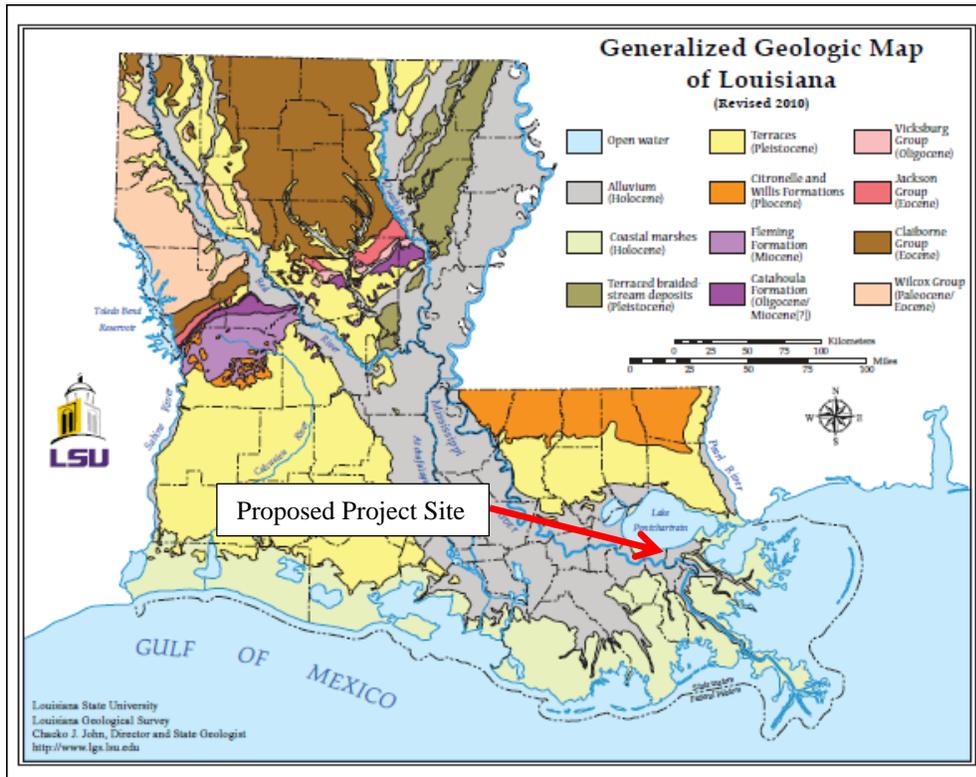


Figure 7 - Generalized Geologic Map of Louisiana (LSU 2010)

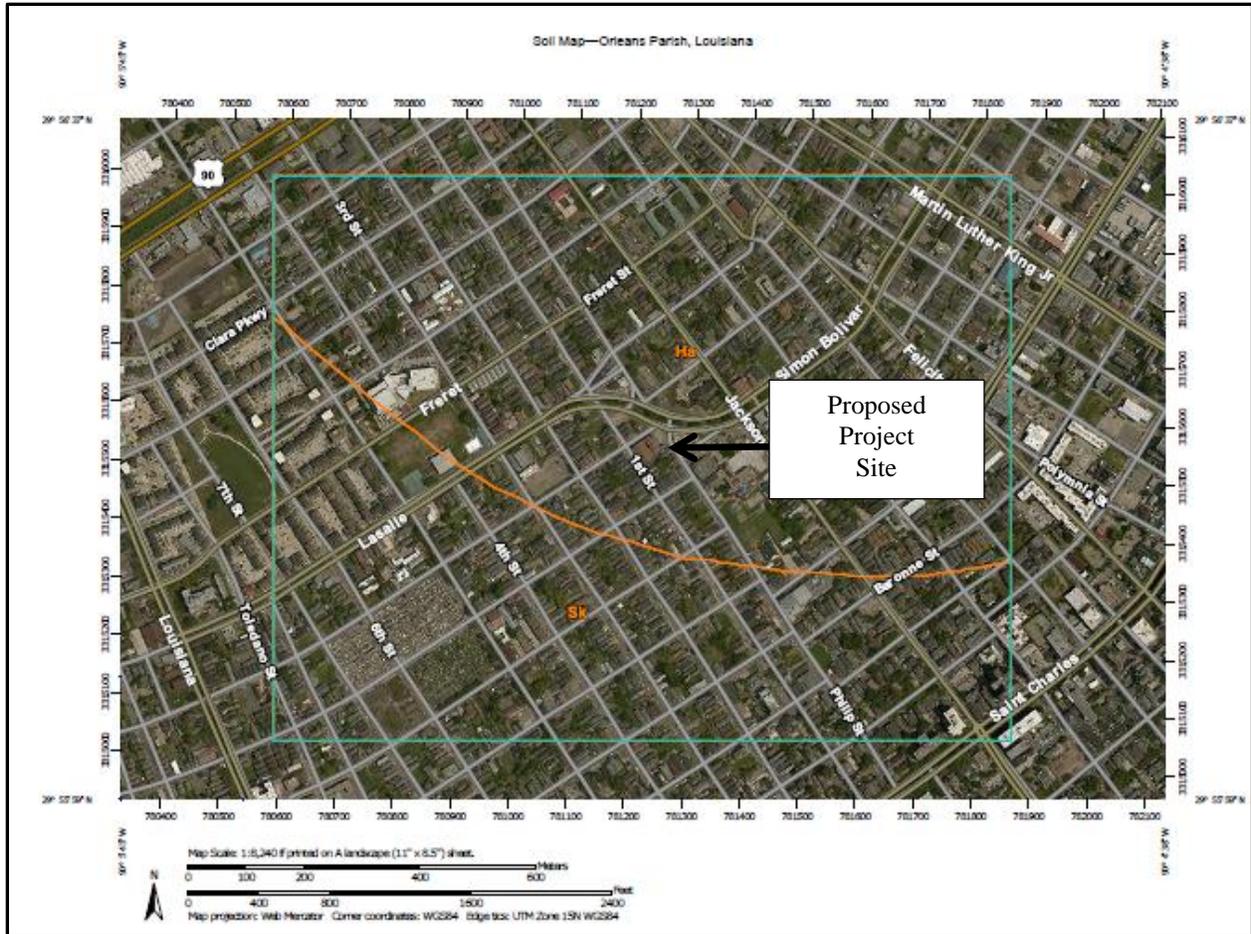
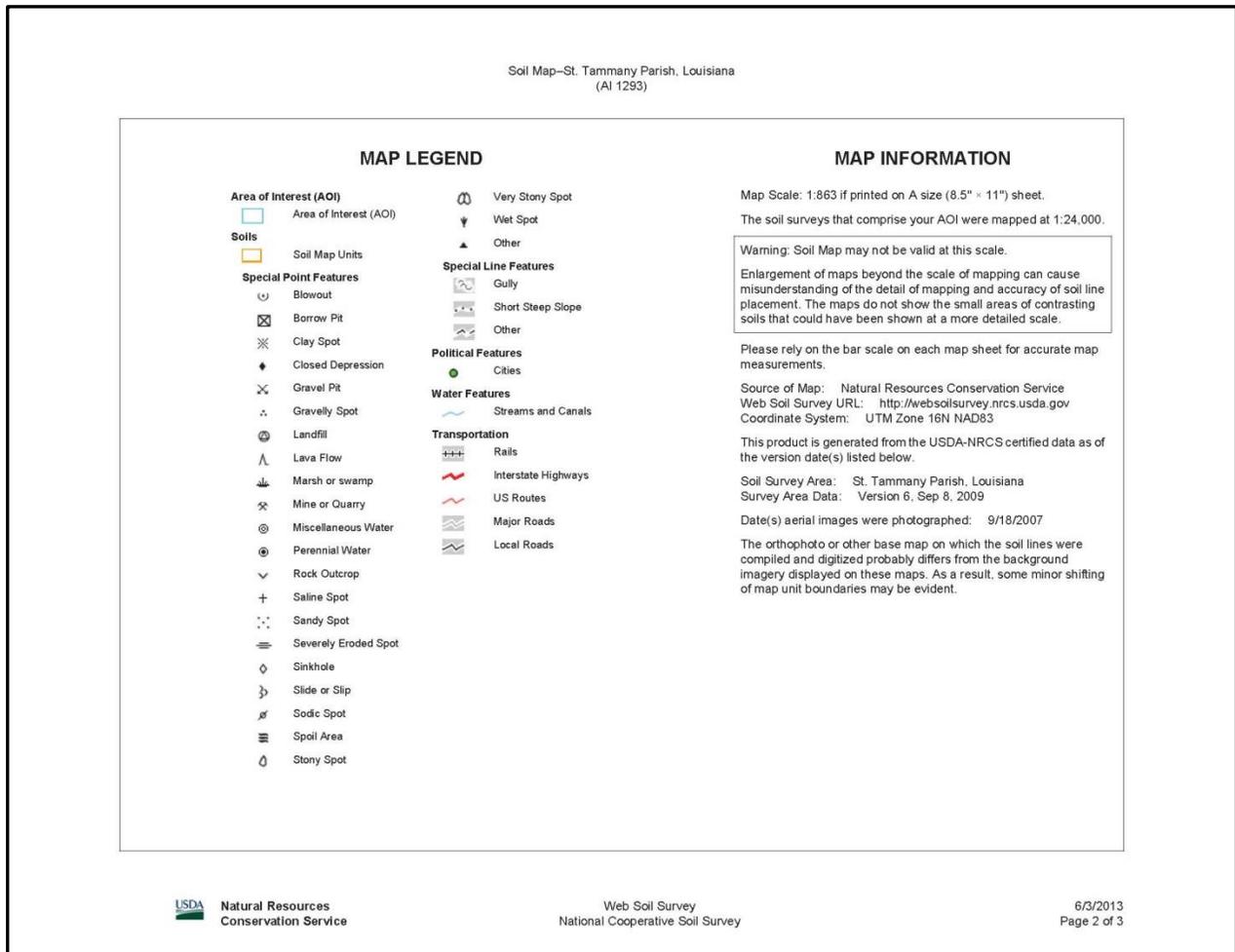


Figure 8 - NRCS Web Soil Survey Mapper (NRCS 2014)



Natural Resources Conservation Service

Web Soil Survey
National Cooperative Soil Survey

6/3/2013
Page 2 of 3

Figure 9 - NRCS Web Soil Survey Mapper Legend (NRCS 2014)

Orleans Parish, Louisiana (LA071)			
Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
Ha	Harahan clay	181.3	59.1%
Sk	Schriever clay, 0 to 1 percent slopes	125.2	40.9%
Totals for Area of Interest		306.5	100.0%

Figure 10 - NRCS Classification Summary for Proposed Project Site (NRCS 2014)

4.1.3 Environmental Consequences

Alternative 1 – No Action

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

Alternative 2 – Repair Damaged Facility to Pre-Disaster Condition

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

Alternative 3 – Purchase, Renovate, and Relocate to an Alternate Site (Proposed Action)

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

4.2 Waters of the United States and Wetlands

4.2.1 Regulatory Setting

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

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

exceptions such as Indian Country Lands. Louisiana administers the NPDES Program and surface water discharge permitting system under the Louisiana Pollutant Discharge Elimination System (LPDES) program.

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

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

4.2.2 Existing Conditions

Surface Water

The hydrologic regime of Orleans Parish involves the movement of freshwater and salt water masses through the region as a result of the interaction among the Mississippi River discharge, regional precipitation, winds, and tides. The current hydrologic regime is influenced by both natural and manmade factors. The basic natural hydrologic system is governed by the pattern of major abandoned distributary channels of the Mississippi River delta complex and interdistributary basin channels, which serve to drain swamps and marshes into the estuarine lakes, bays, and sounds (USDA NRCS, 1989).

Under natural conditions and before human influence, the Mississippi River flowed through the wetlands to the Gulf via distributary channels. Rainfall and Mississippi River floodwaters

flowed down the gentle slopes of the natural levees and slowly through the swamps and marshes as sheet flow and intertributary basin channel flow. The wetland vegetation and the shallow, winding, intertributary channels slowed the progress of this drainage and stored the freshwater for gradual release into the tidewaters. This situation contributed to a stable environment where water levels and salinity values changed gradually with changing tidal conditions. During historic times, manmade factors have greatly altered the natural hydrologic regime. Leveeing of the Mississippi River halted the annual overbank flooding, and the channelized drainage network in the leveed area collected precipitation to be discharged into the wetlands at pumping stations and floodgates.

Manmade modifications of the wetlands also occurred within the recent historic period. Deepwater canals and spoil banks appeared as a result of logging activity, drainage, navigation improvements, and later, for oil and gas well drilling access and pipelines. These and other modifications allowed surplus freshwater to pass more quickly from the point discharge sources into the estuary. Spoil banks along the canals segmented the wetlands and hindered circulation. Greater water depths in the canals provided for greater tidal fluctuation and saltwater intrusion during dry periods. Major intrusions of saltwater in the Mississippi River generally do not extend as far north as Orleans Parish, but intrusions through canals and other channels reach other surface waters in most parts of the parish.

Under these manmade conditions, the hydrologic circulatory system has shifted to reflect the competition between local runoff in the wetlands coupled with discharge from diked areas and daily tides. The overall effect of these modifications has been the rapid alteration of a stable hydrologic situation into one having a greater fluctuation of water levels, salinity values, and sediment transfers and deposition. In Orleans Parish all of the water used for public consumption and industrial use is taken from the Mississippi River. The quality of this water is closely monitored by federal and state government agencies. The quality of the water varies somewhat with the volume of flow in the river, but it is considered suitable for public consumption in Orleans Parish (USDA NRCS 1989).

Ground Water

Ground water is available in four aquifers in Orleans Parish. The major aquifers are the Gramercy 200-foot sand aquifer, the Norco 400-foot sand aquifer, the Gonzales 700-foot sand aquifer, and the 1,200-foot sand aquifer. The Gramercy and Norco aquifers are too brackish for municipal or industrial use. Some industrial use is made of the Gonzales aquifer. The 1,200-foot sand aquifer contains too much salt for most uses (USDA NRCS 1989).

Site Conditions

According to the U.S. Fish & Wildlife Service (USFWS) National Wetlands Inventory (NWI) map, the proposed project is not located in or adjacent to any designated wetlands or jurisdictional waters of the U.S. Furthermore, during a site visit, conducted on August 1, 2013, FEMA Environmental Specialists observed no wetlands areas or connections to U.S. waters at the proposed site (FEMA Site Reconnaissance Form, 2013). The area of the proposed site is urban development with paved roadways, curbing, and stormwater collection and conveyance to

a Stormwater sewer system. Site drainage is ultimately conveyed through a network of piping and canals to the Mississippi River.

4.2.3 Environmental Consequences

Alternative 1 – No Action

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

Alternative 2 – Repair Damaged Facility to Pre-Disaster Condition

This action alternative would have no impact on wetlands or other waters of the United States. FEMA has determined that the project location is an urban, previously-disturbed site, and is not a wetland subject to Executive Order 11990. This alternative would not require a permit under Section 10 of the Rivers and Harbors Act. Correspondence from the USEPA, dated August 27, 2013, states that jurisdictional waters of the United States do not occur at the proposed project site. Correspondence from the USACE, dated September 30, 2013, states that the site is not a wetland subject to Army Corps of Engineers jurisdiction, and that a Department of the Army permit under Section 404 of the Clean Water Act will not be required for the deposition or redistribution of dredged or fill material on this site (Appendix A).

If the project results in a discharge to waters of the State, a Louisiana Pollution Discharge Elimination System (LPDES) permit may be required in accordance with the Clean Water Act and the Louisiana Clean Water Code. If the project results in a discharge of wastewater to an existing wastewater treatment system, that wastewater treatment system may need to modify its LPDES permit before accepting the additional wastewater. In order to minimize indirect impacts (erosion, sedimentation, dust and other construction-related disturbances) to the nearby waters of the United States and well defined drainage areas surrounding the site, the contractor should ensure compliance with all local, state, and federal requirements related to sediment control, disposal of solid waste, control and containment of spills, and discharge of surface runoff and stormwater from the site. Accordingly, the contractor should implement Best Management Practices (BMPs) that meet the Louisiana Department of Environmental Quality's (LDEQ) permitting specifications for stormwater discharge regulated under Sections 401 and 402 of the CWA, and include the following into the daily operations of the construction activities: silt screens, barriers (e.g., hay bales), berms/dikes, and/or fences placed where and as needed. Fencing should be placed for marking staging areas to store construction equipment and supplies as well as conduct maintenance/repair operations. Hazardous materials associated with construction equipment should be handled according to local, state, and federal regulations in order to minimize the risk of spills and leaks and subsequent impacts to surface and groundwater resources.

Alternative 3 – Purchase, Renovate, and Relocate to an Alternate Site (Proposed Action)

The Proposed Action Alternative would have no impact on wetlands or other waters of the United States. FEMA has determined that the project location is an urban, previously disturbed site, and is not a wetland subject to Executive Order 11990. This alternative would not require permits under Section 10 of the Rivers and Harbors Act. Correspondence from the USEPA, dated August 27, 2013, states that jurisdictional waters of the United States do not occur at the proposed project site. Correspondence from the USACE, dated September 30, 2013, states that the site is not a wetland subject to Army Corps of Engineers jurisdiction, and that a Department of the Army permit under Section 404 of the Clean Water Act will not be required for the deposition or redistribution of dredged or fill material on this site (Appendix E).

If the project results in a discharge to waters of the State, a Louisiana Pollution Discharge Elimination System (LPDES) permit may be required in accordance with the Clean Water Act and the Louisiana Clean Water Code. If the project results in a discharge of wastewater to an existing wastewater treatment system, that wastewater treatment system may need to modify its LPDES permit before accepting the additional wastewater. In order to minimize indirect impacts (erosion, sedimentation, dust and other construction-related disturbances) to the nearby waters of the United States and well defined drainage areas surrounding the site, the contractor should ensure compliance with all local, state, and federal requirements related to sediment control, disposal of solid waste, control and containment of spills, and discharge of surface runoff and stormwater from the site. Accordingly, the contractor should implement Best Management Practices (BMPs) that meet the Louisiana Department of Environmental Quality's (LDEQ) permitting specifications for stormwater discharge regulated under Sections 401 and 402 of the CWA, and include the following into the daily operations of the construction activities: silt screens, barriers (e.g., hay bales), berms/dikes, and/or fences placed where and as needed. Fencing should be placed for marking staging areas to store construction equipment and supplies as well as conduct maintenance/repair operations. Hazardous materials associated with construction equipment should be handled according to local, state, and federal regulations in order to minimize the risk of spills and leaks and subsequent impacts to surface and groundwater resources.

4.3 Floodplains

4.3.1 Regulatory Setting

Executive Order (EO) 11988, Floodplain Management, requires federal agencies to avoid to the extent possible the long and short-term adverse impacts associated with the occupancy and modification of flood plains and to avoid direct and indirect support of floodplain development, i.e., within the 1% annual chance special flood hazard area (SFHA) (i.e., 100-year floodplain) whenever there is a practicable alternative (for "Critical Actions", within the 0.2% annual chance SFHA, i.e., the 500-year floodplain). FEMA used the National Flood Insurance Program (NFIP) preliminary Flood Insurance Rate Maps (FIRM) to determine the flood hazard zone for the proposed project location. FEMA's regulations for complying with EO 11988 are found in 44 CFR Part 9, Floodplain Management and Protection of Wetlands.

44 CFR Section 9.6 details an 8-step process that decision-makers must use when considering projects either located within the floodplain or with the potential to affect the floodplain. The 8-step process: assesses the action with regard to human susceptibility to flood harm and impacts to wetlands; analyzes principle flood problems, risks from flooding, history of flood loss, and existing flood protection measures; and includes public notice and opportunity for the public to have early and meaningful participation in decision-making and alternative selection. In conjunction with the EA development, the 8-step process formulates and describes considered alternatives and determines their practicability as required by FEMA regulations. If impacts cannot be avoided, the 8-step process includes requirements to incorporate measures to minimize and mitigate potential risks from flooding and impacts to wetlands as appropriate.

4.3.2 Existing Conditions

Orleans Parish has always been vulnerable to flooding during any season of the year. The principal sources of flooding are rainfall ponding and hurricane or tropical storm surges. Rainfall data is available at a nearby gage in Audubon Park. Continuous gage records of water-surface elevations are available in many nearby lakes and bays. Significant flooding from rainfall ponding, hurricanes or tropical storms have occurred in 1909, 1915, 1947, 1956, 1969, 1978, 1980 and 2005, with the hurricanes of 1965, Hurricane Betsy, and 2005, Hurricanes Katrina and Rita, resulting in major damage throughout the parish.

In 1965, Hurricane Betsy hit Orleans Parish, and even though the majority of New Orleans remained dry, dozens of residents in the parish were killed. In 1995, rain-induced flooding highlighted the weaknesses in the existing pumping system, and several areas were severely flooded. After the flooding in 1995, additional measures were taken to repair New Orleans' hurricane defense system, as well as upgrade and restore pumping capacity. Hurricane Katrina was the costliest and deadliest storm to hit Orleans Parish. It was the sixth-strongest hurricane ever recorded and the third strongest hurricane on record that made landfall in the United States. At its strongest, Hurricane Katrina reached Category 5 strength on the Saffir-Simpson Hurricane Scale, and had been reduced to a Category 3 scale when it made landfall in Louisiana. The storm surge produced by the hurricane's right-front quadrant, which contained the strongest winds at times exceeded 28 feet, and resulted in the catastrophic failure of the flood protection system in New Orleans. Over 80 percent of the Greater New Orleans area was submerged.

Hurricane Rita was the fourth most intense storm from the Atlantic, and the most intense tropical cyclone ever observed in the Gulf of Mexico. The City of New Orleans was still reeling from the damage caused by Hurricane Katrina when the threat of Hurricane Rita was forecast. Although Hurricane Rita remained well to the south and west of New Orleans, a pre-landfall storm surge overwhelmed the already weakened levee of the Industrial Canal protecting the Lower Ninth Ward. By landfall, more sections of the levee system in New Orleans breached, resulting in more catastrophic flooding in New Orleans. The past history of flooding within Orleans Parish indicates that flooding may occur during any season of the year. In the cooler months, the area is subject to heavy rainfalls resulting from frontal passages; in the summer months heavy rainfalls result from convective thundershowers. In the late summer, hurricanes accompanied by rainfall and super-elevated water-surface elevations pose the largest threat of flooding to the area.

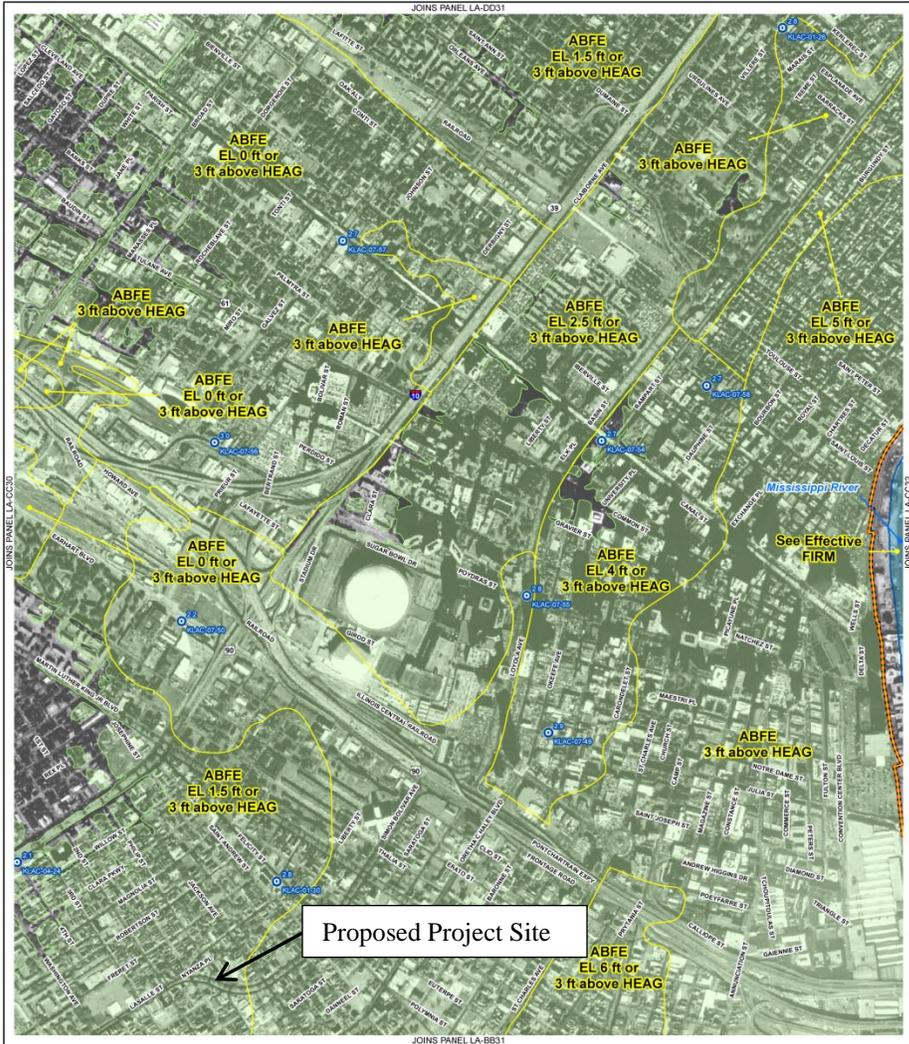
Flood Protection Measures

Drainage of flood waters in Orleans Parish is accomplished by a system of structures and canals which outflow to pumping stations. The system prior to Hurricane Katrina consisted of 15 major drainage pumping stations and 5 minor pumping stations which provide drainage for approximately 57,145 acres of land. The stations housed over 100 pumps with a combined capacity of approximately 48,500 cubic feet per second. Currently, in addition to the system that was in place before Katrina, there are sheet pilings that were added immediately after the storm as emergency closures to keep surge from entering the canals, as well as interim gates and temporary pumps. Proposals which would place permanent gated structures and pump stations at the mouths of outfall canals from Lake Pontchartrain, navigable floodgates along the Industrial Canal, as well as additional armoring on the backsides of levees in areas most exposed to storm surges and at transition points between levees, floodwalls and other structures that had proved vulnerable during the hurricanes are underway. The parish is protected from the Mississippi River by levee. On the east bank of Orleans Parish, the Lake Pontchartrain and Vicinity Hurricane Protection Levee was designed to prevent flooding from hurricane surges from Lake Pontchartrain and Lake Borgne. Post Hurricane Katrina, the levees in Orleans Parish, with the exception of the Mississippi River levees, although physically still in place, were compromised to the point that they were not considered sound enough to adequately protect against the 1-percent-annual-chance storm event (FEMA 2008).

During an initial post-hurricane (i.e. Hurricanes Katrina and Rita) analysis, FEMA determined that the “100-Year” or 1-percent chance storm flood elevations on FIRMs for many Louisiana communities, referred to as Base Flood Elevations (BFEs), were too low. FEMA created recovery maps showing the extent and magnitude of hurricanes Katrina’s and Rita’s surge, as well as information on other storms over the past 25 years (LaMP 2007). The 2006 advisory flood data shown on the recovery maps for the Louisiana-declared disaster areas show high-water marks surveyed after the storm, flood limits developed from these surveyed points, and Advisory Base Flood Elevations (ABFEs). The recovery maps and other advisory data were developed to assist parish officials, homeowners, business owners, and other affected citizens with their recovery and rebuilding efforts (LaMP 2007). The ABFE maps were released for Orleans Parish on June 5, 2006. Per ABFE Map Panel LA-CC31, the proposed project site is located in an ABFE Elevation 1.5 feet National Geodetic Vertical Datum (NGVD) 29 or 3 Feet above Highest Existing Adjacent Grade (HEAG) Zone (Figure 11).

The preliminary Digital Flood Insurance Rate Maps (DFIRMs) for Orleans Parish, dated November 9, 2012, are currently considered the best available flood risk data for the project area. Even if not officially adopted by a community, best available floodplain data identifies the minimum elevation and reconstruction requirements for FEMA grants. Per Preliminary DFIRM Panel 22071C0229F (Figure 12), the proposed project site is located in Shaded X Flood Zone (Levee Protected from the Base Flood).

In compliance with FEMA policy implementing EO 11988, Floodplain Management, the proposed project was reviewed for possible impacts associated with occupancy or modification to floodplain. Orleans Parish enrolled in the NFIP on August 3, 1970.



HURRICANE KATRINA SURGE INUNDATION AND ADVISORY BASE FLOOD ELEVATION MAP
Orleans Parish, Louisiana
Map Number: LA-CC31

FEMA

Date of Event: August 29, 2005
 Date of Map: June 5, 2006

OVERVIEW MAP

LEGEND

- State Boundary
- Parish Boundary
- Vertical Control Point¹
- Levee
- Hurricane Katrina Related Data
 - Preliminary Indoor High Water Mark^{2,3}
 - Preliminary Outdoor High Water Mark^{2,3}
 - Preliminary Debris High Water Mark^{2,3}
 - Limit of Katrina Surge Inundation²
- Flood Advisory Related Data
 - Advisory Base Flood Elevation (ABFE) Zone, including Flood Zone Type (AE, or VE), and elevation (in feet)
 - 3 ft Above HEAG Criterion Applies

HOW TO READ THIS MAP

If review practical limits, the Advisory Base Flood Elevation (ABFE) to be used for rebuilding at a particular property is the higher of these two options:

- (1) Current, effective Base Flood Elevation (BFE) shown on the community's Flood Insurance Rate Map (FIRM), or
- (2) 3 feet above Highest Existing Adjacent Grade (HEAG) at the building site. The HEAG is defined as the highest natural elevation of the ground surface prior to construction next to the proposed walls of a structure.

Using the best available data, FEMA has mapped the areas of the Parish where each of these two options should be applied:

- In green-shaded areas:** FEMA recommends that the first floor of the building (including basement) be elevated 3 feet above HEAG at the building site.
- Outside of green-shaded areas:** FEMA recommends that the first floor of the building (including basement) be elevated at or above the BFE shown on the community's FIRM. FEMA has provided the current BFEs on the map above in yellow and black text (for example, "EL 1.5 ft"). The zone or area where each BFE applies is outlined in yellow. These zone boundaries are the same as those shown on the FIRM. If the FIRM does not have a BFE for a particular area, no elevation will be listed on the map above. In these cases, buildings should be elevated to 3 feet above HEAG.

Anywhere in the Parish, the Community Floodplain Administrator may determine a site-specific ABFE rather than rely on the information mapped above. Using detailed topographic data for the site, the Floodplain Administrator can determine actual elevation corresponds with 3 feet above HEAG and compare it to the FIRM BFE. Again, FEMA's guidance is that buildings should be elevated to whichever of those two elevations is higher at the site.

For more information on how the ABFE guidance was determined for this Parish, please see: http://www.fema.gov/pdf/hazard/floodrecoverydata/orleans_parrish/06-12-06.pdf

MAPS FOR ADVISORY PURPOSES ONLY - NOT FOR INSURANCE RATING PURPOSES
 For insurance rating purposes, refer to the currently effective Flood Insurance Rate Map (FIRM), available from your local government or the FEMA Map Service Center (1-800-368-9616; <http://msc.fema.gov>)
 For more information on these advisory maps, please see http://www.fema.gov/hazard/floodrecoverydata/katrina/katrina_index.shtml

Data Sources:
 Aerial Imagery: USDA National Agriculture Imagery Program, 2004
 Flood Zones and Elevations: FEMA Flood Insurance Rate Maps (Orleans Parish, 1994)
 High Water Marks: FEMA (Identified and Surveyed Sept-Dec, 2005)
 Vertical Control Monuments: National Geodetic Survey
 Storm Trac: NCEM National Weather Service

Notes:
¹ Measured in feet relative to the North American Vertical Datum of 1988.
² Measured in feet relative to the National Geodetic Vertical Datum of 1929 (NGVD29). To convert from NGVD29 to the North American Vertical Datum of 1988 in Orleans Parish, subtract 0.2 feet.
³ Foundation levels submitted from surveyed, surge-only High Water Marks. Local wave effects (swell heights and wave runup) are not included in these elevations.

Figure 11 - ABFE Map LA-CC31 (FEMA 2006)

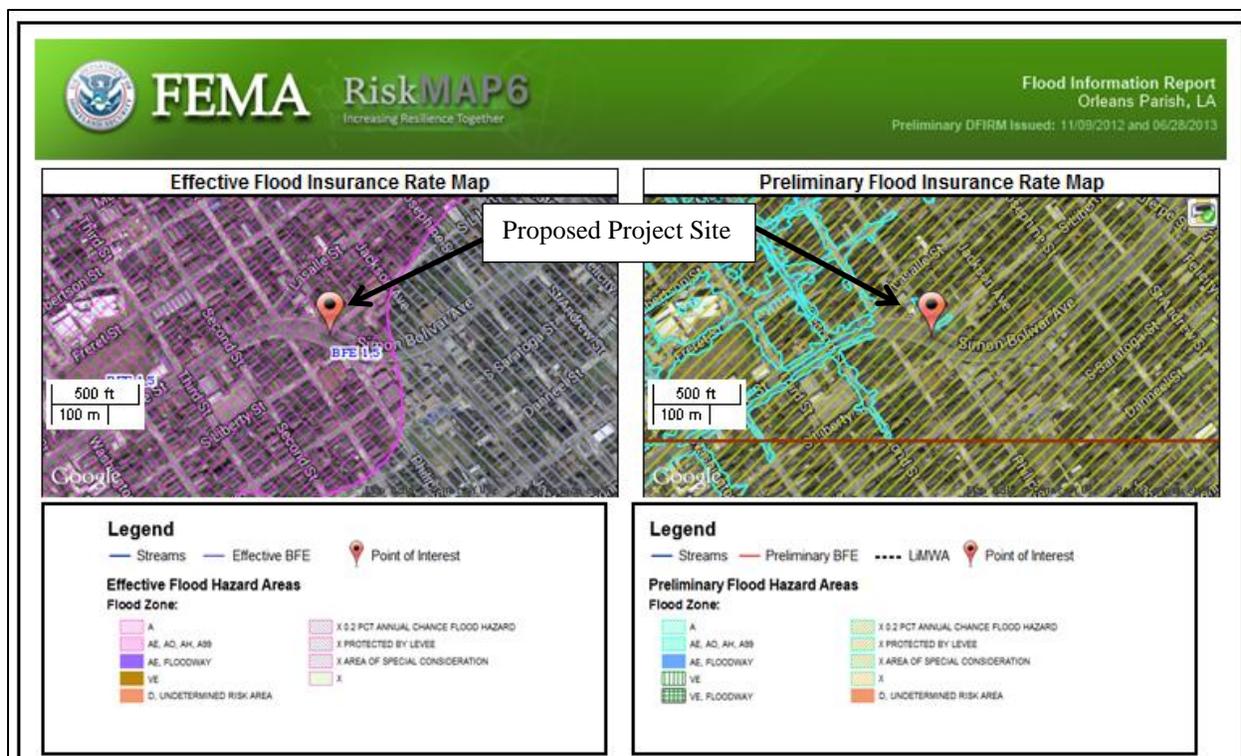


Figure 12 - Orleans Parish Preliminary DFIRM Map Panel Number 22071C0229F (FEMA 2012)

4.3.3 Environmental Consequences

Alternative 1 – No Action

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

Alternative 2 – Repair Damaged Facility to Pre-Disaster Condition

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

Alternative 3 – Purchase, Renovate, and Relocate to an Alternate Site (Proposed Action)

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

4.4 Coastal Resources

4.4.1 Regulatory Setting

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

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

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

4.4.2 Existing Conditions

The proposed project site is in Orleans Parish, which is located in the Louisiana Coastal Zone. Correspondence from the LDNR's Office of Coastal Management (OCM), dated June 25, 2013, confirms that the proposed project site is located within the Louisiana Coastal Zone (Appendix E; Figure 13).

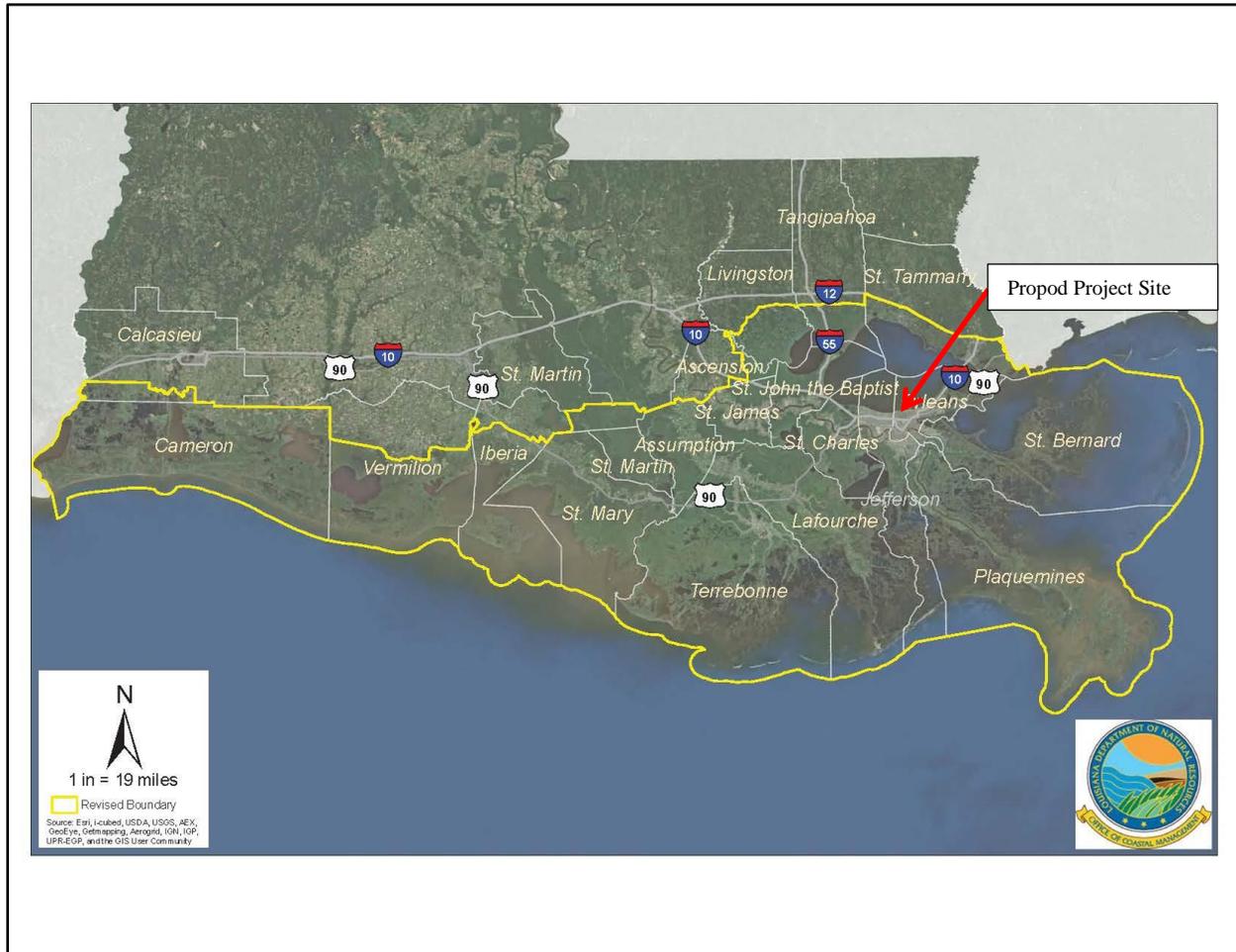


Figure 13 - Louisiana Coastal Zone Boundary Map (LDNR OCM 2014)

4.4.3 Environmental Consequences

Alternative 1 - No Action

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

Alternative 2 – Repair Damaged Facility to Pre-Disaster Condition

This action alternative would involve construction activities within the Louisiana Coastal Management Zone. Accordingly, the Applicant would be responsible for coordinating with and

obtaining any required permit(s) from the Louisiana Department of Natural Resources' (LDNR) Coastal Management Division (CMD) prior to initiating work. All documentation pertaining to these activities and Applicant compliance with any conditions should be forwarded to the State and FEMA for inclusion in the permanent project files.

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

Alternative 3 – Purchase, Renovate, and Relocate to an Alternate Site (Proposed Action)

Correspondence from the LDNR's Office of Coastal Management (OCM), dated August 16, 2013, states that the Proposed Action Alternative, if implemented, would require the Applicant to complete a CUP Application (Appendix E). The Applicant is responsible for coordinating with and obtaining any required CUPs or other authorizations from LDNR-OCM's Permits and Mitigation Division prior to initiating work.

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

4.5 Federally Protected Species and Critical Habitats

4.5.1 Regulatory Setting

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

4.5.2 Existing Conditions

According to the USFWS, Information, Planning, and Conservation (IPaC) online system, accessed on August 4, 2014, a total of three threatened, endangered, or candidate species, and/or designated critical habitat, federally listed by the U.S. Fish and Wildlife Service (USFWS) are known to occur in Orleans Parish (Table 1) (USFWS, IPaC, 2014). A site visit conducted on August 1, 2013, confirmed that the proposed project site is located within a previously disturbed

urban area. No listed species or critical habitats were identified present. The proposed project site is located within the Louisiana Flyway (USFWS 2014).

Common Name	Scientific Name	Federal Status	Critical Habitat	Habitat Requirements
Sprague's Pipit	(<i>Anthus spragueii</i>)	Candidate	No	Grassland bird that overwinters during its non-breeding season from western Louisiana to Mexico and southwestern states.
Pallid sturgeon	(<i>Scaphirhynchus albus</i>)	Threatened	No	Anadromous fish species that spends most of its life in freshwater habitats and spawns in estuarine bays. Found in a variety of substrate areas based on age class of species.
Gulf sturgeon	(<i>Acipenser oxyrinchus desotoi</i>)	Threatened	No	Anadromous fish species that spends most of its life in freshwater habitats and spawns in estuarine bays. Found in a variety of substrate areas based on age class of species.

Table 1 - Federally Listed Species Known to Occur in Orleans Parish (USFWS 2014)

4.5.3 Environmental Consequences

Alternative 1 – No Action:

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

Alternative 2 – Repair Damaged Facility to Pre-Disaster Condition

The proposed project site is located within a previously disturbed area. Additionally, FEMA Environmental Specialists identified no listed species or critical habitat during a site visit conducted at the proposed project site. Consequently, given the scope of work, it is anticipated

that this action alternative would have no impacts on species federally listed as threatened or endangered, migratory birds, or federally listed critically habitats.

Alternative 3 – Purchase, Renovate, and Relocate to an Alternate Site (Proposed Action)

The Proposed Action Alternative has been reviewed by the USFWS for effects to federal trust resources under their jurisdiction and currently protected by the Endangered Species Act of 1973. Correspondence from the Louisiana Department of Wildlife and Fisheries (LDWF), dated August 25, 2014, states that the Agency anticipates no impacts to rare, threatened, or endangered species or critical habitats for the proposed project. Additionally, correspondence from the USFWS, dated August 27, 2013, states that the proposed project would have no effect on federal trust resources under its jurisdiction and currently protected by the ESA (Appendix E).

4.6 Air Quality

4.6.1 Regulatory Setting

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

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

4.6.2 Existing Conditions

Correspondence from the LDEQ, dated September 5, 2013, states that Orleans Parish is currently classified by the USEPA as an attainment area and has no general conformity determination obligations (Appendix E).

4.6.3 Environmental Consequences

Alternative 1 – No Action

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

Alternative 2 – Repair Damaged Facility to Pre-Disaster Condition

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

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

Alternative 3 – Purchase, Renovate, and Relocate to an Alternate Site (Proposed Action)

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

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

4.7 Noise

4.7.1 Regulatory Setting

Noise is commonly defined as unwanted or unwelcome sound, and most commonly measured in decibels (dB) on the A-weighted scale (i.e. the scale most similar to the range of sounds that the human ear can hear). The Day-Night Average Sound Level (DNL) is an average measure of sound. The DNL descriptor is accepted by federal agencies as a standard for estimating sound

impacts and establishing guidelines for compatible land uses. Sound is federally regulated by the Noise Control Act of 1972, which charges the USEPA with preparing guidelines for acceptable ambient noise levels. USEPA guidelines, and those of many other federal agencies, state that outdoor sound levels in excess of 55 dB DNL are “normally unacceptable” for noise-sensitive land uses including residences, schools, or hospitals (USEPA 1974). The Noise Control Act, however, only charges implementation of noise standards to those federal agencies that operate noise-producing facilities or equipment.

Orleans Parish Ordinance places certain restrictions on any machinery, equipment or device that makes or causes a noise. The proposed project site is located in a municipalities zoning district. For these areas, noise that exceeds 65 decibels is not allowed from 7 a.m. to 9 p.m. on weekdays (Monday-Thursday) and 8 a.m. to 10 p.m. on weekends (Friday-Sunday). Noise that exceeds 60 decibels is not allowed between 9 p.m. to 7 a.m. on weekdays and 10 p.m. to 8 a.m. on weekends. Construction activity and general maintenance shall be exempt from daytime decibel restrictions but the maximum nighttime sound level shall apply in all instances (Orleans Parish 2014).

4.7.2 Existing Conditions

The PSMSF is classified as a noise-sensitive receptor, serving a population considered particularly vulnerable to the adverse effects of noise pollution (i.e., children). The area immediately surrounding the proposed project site contains mainly residential and light commercial/industrial development.

4.7.3 Environmental Consequences

Alternative 1 – No Action

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

Alternative 2 – Repair Damaged Facility to Pre-Disaster Condition

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

Alternative 3 – Purchase, Renovate, and Relocate to an Alternate Site (Proposed Action)

Under the Proposed Action Alternative, construction activities would result in short-term increases in noise during the reconstruction/reconfiguration period. Equipment and machinery

utilized on the project site would meet all local, state, and federal noise regulations. Additionally, the contractor should coordinate with the Applicant so as to minimize the potential disruption of any school activities to the extent possible. Following the completion of construction activities, operations at the proposed expanded facility would not result in any significant permanent increases in noise levels.

4.8 Traffic

4.8.1 Regulatory Setting

The Louisiana Department of Transportation and Development (LADOTD) is responsible for maintaining public transportation state highways, interstate highways under state jurisdiction, and bridges located within the State of Louisiana. These duties include the planning, design, and building of new highways in addition to the maintenance and upgrading of current highways. Roads not part of any highway system usually fall under the jurisdiction of and are maintained by applicable, local government entities. However, the LADOTD is responsible for assuring all local agency Federal-aid projects comply with all applicable federal and state requirements (LADOTD 2007).

4.8.2 Existing Conditions

The proposed project site occupies the north half of the city block bordered on the north by S. Liberty Street, on the east by Philip Street, on the south by Loyola Street, and on the west by First Street. Additionally, on the northeast corner of the site, Philip and S. Liberty intersect with Simon Bolivar Avenue. Simon Bolivar Avenue is a four lane divided thoroughfare with neutral ground in the median (Figure 14). All of these are two-way roads and consists of asphalt and concrete 12-foot lanes with curbing. The site currently has one small parking lot with two driveway entrances. This parking area is proposed to be converted to a soft-surfaced play area and no parking is included in this action.



Figure 14 - Traffic Layout (Google Earth 2014)

4.8.3 Environmental Consequences

Alternative 1 – No Action

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

Alternative 2 – Repair Damaged Facility to Pre-Disaster Condition

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

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

Alternative 3 – Purchase, Renovate, and Relocate to an Alternate Site (Proposed Action)

Under the Proposed Action Alternative, there is anticipated to be a temporary increase in construction related traffic during building of the facilities. Furthermore, the proposed action would expand the damaged facility’s educative and administrative capabilities and includes the repair of the existing driveway entrance along Philip Street at the corner of S. Liberty Street. Consequently, construction of the Proposed Action alternative could adversely affect travel levels by increasing the numbers of visitors and vehicles traveling to and from the site daily. The population served by the facility includes a large proportion of nearby residents, which will reduce adverse impacts attributable to traffic.

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

4.9 Environmental Justice

4.9.1 Regulatory Setting

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

4.9.2 Existing Conditions

Socioeconomic and demographic data for the project area was reviewed to determine if the proposed action would have a disproportionate adverse impact on minority or low-income persons. According to the 2010 U.S. Census, the population of Orleans Parish is: 33.0% White; 60.2% Black or African American; 5.2% Hispanic; and 2.9% Asian. The median household income for Orleans Parish is \$36,681, and 27.2% of families earn below the poverty level.

4.9.3 Environmental Consequences

Alternative 1 – No Action

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

Alternative 2 – Repair Damaged Facility to Pre-Disaster Condition

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

Alternative 3 – Purchase, Renovate, and Relocate to an Alternate Site (Proposed Action)

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

4.10 Hazardous Materials

4.10.1. Regulatory Setting

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

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

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

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

4.10.2 Existing Conditions

A review of multiple data sources (e.g. USEPA EnviroMapper and the LDEQ Electronic Document Management System™) revealed that the proposed project site is not identified on a federal and/or state agency’s list concerning voluntary remediation, brownfield, underground storage tank decommission, waste/debris disposal facilities, or oil/gas wells sites. Additionally, there are no obvious sites of concern in the vicinity of proposed project area (USEPA 2013, Appendix E).

4.10.3 Environmental Consequences

Alternative 1 – No Action

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

Alternative 2 – Repair Damaged Facility to Pre-Disaster Condition

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

Alternative 3 – Purchase, Renovate, and Relocate to an Alternate Site (Proposed Action)

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

4.11 Cultural Resources

4.11.1 Regulatory Setting

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

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

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

4.11.2 Existing Conditions

FEMA Historic Preservation Staff consulted the NRHP Database and the Louisiana Cultural Resources Map on May 5, 2014, and determined that 2306-2308 S. Liberty Street and 2224 Philip Street are located within the NRHP eligible Central City historic district. Additional research was conducted online (including the Louisiana SHPO website, the Southeastern Architectural Archives, and the Times Picayune Newspaper). A site visit was carried out on April 1, 2014, by FEMA Historic Preservation Specialists.

The Central City Historic District (NRHP listed in 1981, Table 2), developed in the early nineteenth century as a part of the City of Lafayette in Jefferson County, is a predominantly residential historic district nominated under Criterion C as an example of a historic working class neighborhood. It is significant for its large collection shotgun double houses, styled in an array of late-nineteenth and early-twentieth century eclectic styles. Nearly all of the district’s buildings feature some ornamentation. While 2224 Philip Street dates to the period of significance, it is not

a contributor to the district due to extensive renovations outside the period of significance. And, although a portion of the former Greater St. Stephen Church (2306 S. Liberty Street) is greater than 50 years of age, it does not date to the district’s period of significance and is therefore not a contributor. In addition, it is not individually eligible for the NRHP due to a lack of significance as well as extensive renovations in the late 1960s and early 1980s.

Property Description	Construction Date	Eligibility Determinations
Central City Historic District	1830-1930	NRHP-listed under Criterion C
2306 S. Liberty Street	ca. 1955	Does not contribute to Central City NRHD
2308 S. Liberty Street	ca. 1981	Non-contributing; not individually eligible, does not meet Criterion G
2224 Philip Street	ca. 1883	Does not contribute to Central City NRHD

Table 2 - Eligibility Determination

Upon consultation of data provided by SHPO on April 1, 2014, there are seven recorded archaeological sites within 0.25 miles of the Area of Potential Affect (APE); however, none of these sites will be affected by the current undertaking. Historical map research indicates that the extant building located at 2224 Phillip Street is the original building built at this location. FEMA archaeologist and the SHPO liaison for archeology conducted a site visit on April 1, 2014. The only exposed area on the lot was a small section in the rear that was covered with a concrete slab and a brick-lined feature. FEMA determined and SHPO concurred that it was unlikely that NRHP-eligible archaeological deposits would be uncovered with the demolition of the building as long as the slab and brick-lined feature were not disturbed and there was no salvaging of sub-grade material.

4.11.3 Environmental Consequences

Alternative 1 – No Action

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

Alternative 2 – Repair Damaged Facility to Pre-Disaster Condition

The proposed undertaking would utilize FEMA funding to reconstruct the Greater St. Stephen Christian Academy on its original location at 11110 Lake Forest Boulevard. Based on research using the NRHP database, and the Louisiana Cultural Resources Map on the Louisiana Division of Historic Preservation’s website, FEMA has determined that the project area is not located within a listed National Register Historic District. The existing structure is aged less than 50 years of age and is not eligible under Criteria Consideration G of the National Register Guidelines to be considered eligible for the National Register of Historic Places. Upon consultation of data provided by the SHPO, there are no known archaeological sites within the project area and all work will occur within a previously disturbed area. Therefore, the scope of work as submitted meets the criteria outlined in the PA dated August 17, 2009, Appendix C, Section I.A, I.E, and I.I. In accordance with this document, FEMA is not required to submit projects to the SHPO for review where the work performed meets these allowances.

Alternative 3 – Purchase, Renovate, and Relocate to an Alternate Site (Proposed Action)

A review of this alternative was conducted in accordance with FEMA’s PA dated August 17, 2009 and amended on July 22, 2011 (2009 Statewide PA as amended). In accordance with Stipulation VIII.F of the 2009 Statewide PA as amended, FEMA has determined that there will be a conditional “No Adverse Effect” to historic properties. SHPO concurrence with this determination was received, dated 6/11/2014. Consultation with affected tribes (Alabama-Coushatta Tribe of Texas, Choctaw Nation of Oklahoma, Coushatta Tribe of Louisiana, Jena Band of Choctaw Indians, Mississippi Band of Choctaw Indians, Quapaw Tribe of Oklahoma, Seminole Nation of Oklahoma, Tunica-Biloxi Tribe of Louisiana) and Consulting Parties (Historic Districts Landmarks Commission, Preservation Resource Center, Central City Partnership, and Central City Renaissance Alliance) was conducted per FEMA’s Programmatic Agreement dated August 17, 2009, and amended on July 22, 2011 (PA). The Jena Band of Choctaw Indians and Choctaw Nation of Oklahoma submitted written concurrence with the determination. The remaining Tribes and Consulting Parties 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.

5.0 Cumulative Impacts

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

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

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

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

The proposed project site at 2308 S. Liberty Street and 2224 Philip Street, New Orleans, LA, within the 70113 zip code geographic area (Figure 15). FEMA has determined that the area within a .5 mile radius of the site constitutes an appropriate project impact zone, and the larger geographic area consisting of the 70113 zip code constitutes an appropriate boundary, for a cumulative impact analysis of the proposed action and alternatives.



Figure 15 - Boundary Map for the 70113 Zip Code Geographic Area (Map Technica 2014)

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 2014 numerous FEMA PA program funded, and various non-FEMA funded, debris removal, protective measures, and repair projects have occurred, are occurring, or are reasonably foreseen to occur within the 70113 geographic area to buildings, roads and bridges, recreational and educational facilities, public utilities, waterways, levees, and more (Figure 16). All FEMA funded actions are subjected to various levels of environmental review as a requirement for the receipt of federal funding. An applicant's failure

to comply with any required environmental permitting or other condition is a serious violation which can result in the loss of federal assistance, including funding.



Figure 16 - FEMA-Funded Projects Occurring within the 70113 Zip Code (FEMA 2014)

Table 3 below lists and briefly describes present, past, and reasonably foreseeable infrastructure and recovery improvement projects in or near the 70113 geographic area that are known to FEMA for which environmental reviews were performed, and or that may have the potential for cumulative impacts when combined with the effects of the present proposed action. The table also identifies the potential for cumulative impacts, and the rationale for that assessment.

Project Name / Status	Lead Agency	Location	Description	Cumulative Impacts	Rationale
Recovery School District Single Settlement Request	Recovery School District	New Orleans City Wide	Refurbishment, repair, reconstruction, and new construction for restoration of the school system.	New infrastructure in the areas protected from the base flood promotes future development and represent investment at risk subject to the need for future disaster assistance.	Project is conditioned to comply with minimum NFIP floodplain development regulations as adopted by the local community and will thereby reduce risk and increase protection from future damage.
New Orleans Sewer and Water Board Water Supply and Sanitary Sewer System-Wide Repairs	Sewer and Water Board of New Orleans	New Orleans City-Wide	Repairs and improvements to water and sanitary sewer system components damaged as a result of Hurricane Katrina. Elements include upgrades to current codes and standards including mitigation measures to reduce the risk of future damages in the next flood.	New infrastructure in the areas protected from the base flood promotes future development and represent investment at risk subject to the need for future disaster assistance.	Project is conditioned to comply with minimum NFIP floodplain development regulations as adopted by the local community and will thereby reduce risk and increase protection from future damage.
Hurricane Storm Damage Risk Reduction System	U.S. Army Corps of Engineers	New Orleans Regional Metropolitan Area	Complete re-engineering the levee system in New Orleans and surrounding areas in order to withstand effects from a "100 year storm," or a storm that has a one percent chance of occurring each year.	The Risk Reduction System provides a greater level of flood protection likely providing increased flood damage protection.	Effects from this project reduce overall impacts in the areas levee protected from the base flood including the site of the proposed action.
City of New Orleans City-Wide Road Repairs	City of New Orleans Department of Public Works	New Orleans City-Wide	Repairs and improvements to roads and components damaged as a result of Hurricane Katrina. Elements include upgrades to current codes and standards including mitigation measures to reduce the risk of future damages in the next flood.	New infrastructure in the areas protected from the base flood promotes future development and represent investment at risk subject to the need for future disaster assistance.	Effects of this project when combined with those of the proposed action will not result in significant cumulative impacts.

Table 3 - Projects that May Have the Potential to Contribute to Cumulative Impacts

FEMA has determined that the incremental effects of the other infrastructure recovery and improvement actions are likely to be similar to the impacts and effects described in this EA for the present proposed action, in that the impacts to affected resources are expected to be beneficial, non-existent, minimal, or temporary. FEMA has further determined that the incremental impact of the present proposed project, when combined with the effects of other past, present, and reasonably foreseeable future projects, are neither cumulatively considerable nor significant. Therefore, the cumulative impact of the proposed action to the built and natural environment would be minimal, would be beneficial rather than detrimental, and is not expected to contribute to any adverse effects or to otherwise significantly affect the human environment.

6.0 CONDITIONS AND MITIGATION MEASURES

Based upon the studies, reviews and consultations undertaken in this environmental assessment, several conditions and mitigation measures must be taken by the Applicant prior to and during proposed project implementation.

- The Applicant must follow all applicable local, state, and federal laws, regulations, and requirements and obtain and comply with all required permits and approvals prior to initiating work.
- Applicant shall comply with all local, state, and federal requirements related to sediment control, disposal of solid waste, control and containment of spills, and discharge of surface runoff and stormwater from the site.
- If the project results in a discharge to waters of the State, a Louisiana Pollution Discharge Elimination System (LPDES) permit may be required in accordance with the Clean Water Act and the Louisiana Clean Water Code. If the project results in a discharge of wastewater to an existing wastewater treatment system, that wastewater treatment system may need to modify its LPDES permit before accepting the additional wastewater. In order to minimize indirect impacts (erosion, sedimentation, dust and other construction-related disturbances) to the nearby waters of the United States and well defined drainage areas surrounding the contractor should ensure compliance with all local, state, and federal requirements related to sediment control, disposal of solid waste, control and containment of spills, and discharge of surface runoff and stormwater from the site. All documentation pertaining to these activities and Applicant compliance with any conditions should be forwarded to the State and FEMA for inclusion in the permanent project files.
- The project has been found by the Louisiana Department of Natural Resources (LDNR) to be inside the Louisiana Coastal Zone. LDNR, therefore requires that a complete Coastal Use Permit Application package (Joint Application Form, locality maps, project illustration plats with plan and cross section views, etc.) along with the appropriate application fee, be submitted to their office prior to construction. The Applicant is responsible for coordinating with and obtaining any required Coastal Use Permit(s) (CUP) or other authorizations from the LDNR Office of Coastal Management's Permits and Mitigation Division prior to initiating work. The Applicant must comply with all conditions of the required permits. All documentation pertaining to these activities and Applicant compliance with any conditions should be forwarded to the State and FEMA for inclusion in the permanent project files.
- Per 44 CFR 9.11(d)(3), there shall be no new construction or substantial improvement of structures unless the lowest floor of the structures (including basement) is at or above the level of the base flood. Furthermore, per 44 CFR 9.11(d)(6), no project should be built to a floodplain management standard that is less protective than what the community has adopted in local ordinances through their participation in the National Flood Insurance Program. The Applicant is required to coordinate with the local floodplain administrator

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

- Equipment and machinery utilized on the project site must meet all local, state, and federal noise regulations.
- All activities must be conducted in a safe manner in accordance with OSHA work zone traffic safety requirements.
- The Applicant will not remove the concrete slab or disturb the bricked area in the rear of the lot at 2224 Philip Street.
- The Applicant will demolish the 2224 Phillip Street building without salvaging sub-grade elements unless required to ensure a safe site and will generally limit the ground disturbance associated with the demolition.
- Louisiana Unmarked Human Burial Sites Preservation Act: If human bone or unmarked grave(s) are present within the project area, compliance with the Louisiana Unmarked Human Burial Sites Preservation Act (R.S. 8:671 et seq.) is required. The applicant shall notify the law enforcement agency of the jurisdiction where the remains are located within twenty-four hours of the discovery. The applicant shall also notify FEMA and the Louisiana Division of Archaeology at 225-342-8170 within seventy-two hours of the discovery.
- Inadvertent Discovery Clause: If during the course of work, archaeological artifacts (prehistoric or historic) are discovered, the applicant shall stop work in the vicinity of the discovery and take all reasonable measures to avoid or minimize harm to the finds. The applicant shall inform their Public Assistance (PA) contacts at FEMA, who will in turn contact FEMA Historic Preservation (HP) staff. The applicant will not proceed with work until FEMA HP completes consultation with the SHPO, and others as appropriate.
- Any changes or modifications to the proposed project would require a revised USACE determination. Off-site locations of activities such as borrow, disposals, haul-and detour-roads and work mobilization site developments may be subject to the USACE regulatory requirements.
- Hazardous materials associated with construction equipment should be handled according to local, state, and federal regulations in order to minimize the risk of spills and leaks and subsequent impacts to surface and groundwater resources.

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

7.0 PUBLIC INVOLVEMENT AND AGENCY CONSULTATIONS

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

These consulting agencies include the State Historical Preservation Office, U. S. Fish and Wildlife Service, Louisiana Department of Wildlife and Fisheries, the Governor's Office of Homeland Security and Emergency Preparedness, Louisiana Department of Environmental Quality, U. S. Environmental Protection Agency, Louisiana Department of Natural Resources, and U. S. Army Corps of Engineers. FEMA has received no objections to the project as proposed subsequent to these notifications, and comments and conditions received have been incorporated.

In accordance with applicable local, state, and federal regulations, the Applicant would be responsible for acquiring any necessary permits prior to commencing construction at the proposed project site. FEMA is inviting the public to comment on the proposed action during a fifteen (15) day comment period. A public notice will be published for (5) days in the Parish newspaper, *The Times Picayune*, announcing the availability of this EA for review at the Orleans Parish Main Branch Library, New Orleans, Louisiana, and at the FEMA Louisiana Recovery Office in New Orleans, LA. A copy of the Public Notice is attached in Appendix C.

8.0 LIST OF PREPARERS

LeSchina Holmes – Lead Environmental Protection Specialist, FEMA LRO

Cathy Jones – Environmental Protection Specialist, FEMA LRO

John Renne – Environmental and Floodplain Specialist, FEMA LRO (Contractor)

Richard Williamson – Historical Preservation Specialist, FEMA LRO

Annette Carroll – Historic Preservation Specialist, FEMA LRO

9.0 REFERENCES

- Clean Air Act of 1963, as amended. Available at: <http://www.epa.gov/air/caa/title1.html>
- Clean Water Act of 1972, as amended. Available at: <http://www.epw.senate.gov/water.pdf>
- Coastal Barrier Resources Act of 1982, as amended.
- Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended. Available at: <http://www.epw.senate.gov/cercla.pdf>
- Council on Environmental Quality. 1997. Considering Cumulative Effects Under the National Environmental Policy Act. Available at: <http://energy.gov/sites/prod/files/G-CEQ-40Questions.pdf>
- Endangered Species Act of 1973. Available at: <http://epw.senate.gov/esa73.pdf>
- ESRI. Website. Accessed August 2014 at: <http://www.esri.com/>
- 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>
- Farmland Protection Policy Act of 1981, as amended. Available at: <http://www.gpo.gov/fdsys/pkg/CFR-2010-title7-vol6/pdf/CFR-2010-title7-vol6-part658.pdf><http://www.gpo.gov/fdsys/pkg/CFR-2010-title7-vol6/pdf/CFR-2010-title7-vol6-part658.pdf>
- Federal Emergency Management Agency. 1996. NEPA Desk Reference.
- Federal Emergency Management Agency. 2006. Advisory Base Flood Elevation Map Panel Number CC-31, dated 6/5/2006.
- Federal Emergency Management Agency. 2008. Preliminary Flood Insurance Study: 22071CV00A, Orleans Parish, Louisiana.
- Federal Emergency Management Agency. 2012. Preliminary Flood Insurance Rate Map Panel Number 22071C 0229F, dated 11/9/2012.
- Google Earth. 2014. Aerial Imagery.

Louisiana Coastal Protection and Restoration Authority. 2012. 2012 Coastal Master Plan. Available at: <http://www.coastalmasterplan.louisiana.gov/2012-master-plan/final-master-plan/>

Louisiana Department of Culture, Recreation, and Tourism: Office of Cultural Development. 2013. Letter Correspondence from Pam Breaux, State Historic Preservation Officer, Dated September 16, 2013.

Louisiana Department of Environmental Quality (LDEQ). Electronic Document Management System™ (EDMS). Accessed August 2014 at: <http://edms.deq.louisiana.gov/app/doc/querydef.aspx>

Louisiana Department of Environmental Quality (LDEQ). 2013. DEQ SOB 130820/1665, Paul S. Morton Scholarship Foundation. Linda Brown Hardy, Business and Community Outreach Division.

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

Louisiana Department of Natural Resources, Office of Coastal Management. 2013 Letter Correspondence from Karl L. Morgan, Administrator, Dated August 16, 2013.

Louisiana Department of Natural Resources (LDNR), Permits/Mitigation Support Division. Accessed August 2014 at: <http://dnr.louisiana.gov/crm/coastmgt/coastmgt.asp>

Louisiana Department of Transportation and Development. Website. Accessed August 2013 at: <http://www.dotd.louisiana.gov/>

Louisiana Department of Wildlife and Fisheries: Office of Wildlife. 2014. Letter Correspondence from Carolyn Michoud for Amity Bass, Coordinator, Natural Heritage Program Dated August 25, 2014.

Louisiana Mapping Project (LaMP). 2006-2014. Available at: <http://www.lamappingproject.com>

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>

Louisiana State University. Geological Survey. Accessed August 2014 at: <http://www.lgs.lsu.edu/>

Louisiana State University. 2010. Generalized Geology Map of Louisiana. Available at: <http://www.lgs.lsu.edu/deploy/content/PUBLI/contentpage17.php>

MapTechnica.com. Website. Accessed August 2014 at: <http://www.maptechnica.com/>

Noise Control Act of 1972, as amended. Available at: http://www.epa.gov/air/noise/noise_control_act_of_1972.pdf

Office of the Federal Register National Archives and Records Administration. 2013. *Code of Federal Regulations 36*. Available at: http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&tpl=/ecfrbrowse/Title36/36tab_02.tpl

Office of the Federal Register National Archives and Records Administration. 2013. *Code of Federal Regulations 40*. Available at: http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab_02.tpl

Office of the Federal Register National Archives and Records Administration. 2013. *Code of Federal Regulations 44*. Available at: <http://www.gpo.gov/fdsys/pkg/CFR-2002-title44-vol1/content-detail.html>

Office of the Federal Register National Archives and Records Administration. (2013). *Code of Federal Regulations 50*. Available at: http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&tpl=/ecfrbrowse/Title50/50tab_02.tpl

Paul S. Morton Scholarship Foundation. 2013. Alternate Project Request Letter and AI Packet with Supporting Information.

Resource Conservation and Recovery Act of 1976, as amended. Available at: <http://www.epw.senate.gov/rcra.pdf>

Rivers and Harbors Act of 1899, as amended. Available at: <http://www.epw.senate.gov/rivers.pdf>

Orleans Parish Government. 2014. Orleans Parish Government Code of Ordinances. Available at: https://www.municode.com/library/#!/la/new_orleans/codes/code_of_ordinances

U.S. Census Bureau. 2010. 2010 Census Data. Accessed J August 2014 at: <http://www.census.gov>

U.S. Army Corps of Engineers, New Orleans District. Website. Accessed August 2014 at: <http://www.mvn.usace.army.mil/>

U.S. Army Corps of Engineers. 2013. Letter Correspondence from Karen L. Clement, Solicitation of View Manager, Dated September 30, 2013.

U.S. Department of Agriculture, Natural Resources Conservation Service. Web Soil Survey System. Accessed August 2014 at: <http://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>

U.S. Department of Agriculture, Natural Resources Conservation Service. 2014. National Soil Survey Handbook. Available at: <http://soils.usda.gov/technical/handbook/>

U.S. Department of Agriculture, Natural Resources Conservation Service. 1989. Soil Survey of Orleans Parish, Louisiana.

U.S. Environmental Protection Agency. Enviromapper Website. Accessed August 2014 at: <http://www.epa.gov/emefdata/em4ef.home>

U.S. Environmental Protection Agency. EnviroFacts List of EPA-Regulated Facilities/ Cleanup in My Community Map. Accessed August 2014 at: http://www.epa.gov/enviro/facts/qmr.html#land_brownfields

U.S. Environmental Protection Agency. NEPAssist. Accessed August 2014 at: <http://nepassisttool.epa.gov/nepassist/nepamap.aspx?action=searchloc&wherestr=29.995680%2C%20-90.032824>

U.S. Environmental Protection Agency. 1974. EPA Identifies Noise Levels Affecting Health and Welfare. Available at: <http://www.epa.gov/history/topics/noise/01.htm>

U.S. Environmental Protection Agency. 2014. Currently Designated Nonattainment Areas for All Criteria Pollutants. Available at: <http://www.epa.gov/oar/oaqps/greenbk/ancl.html>.

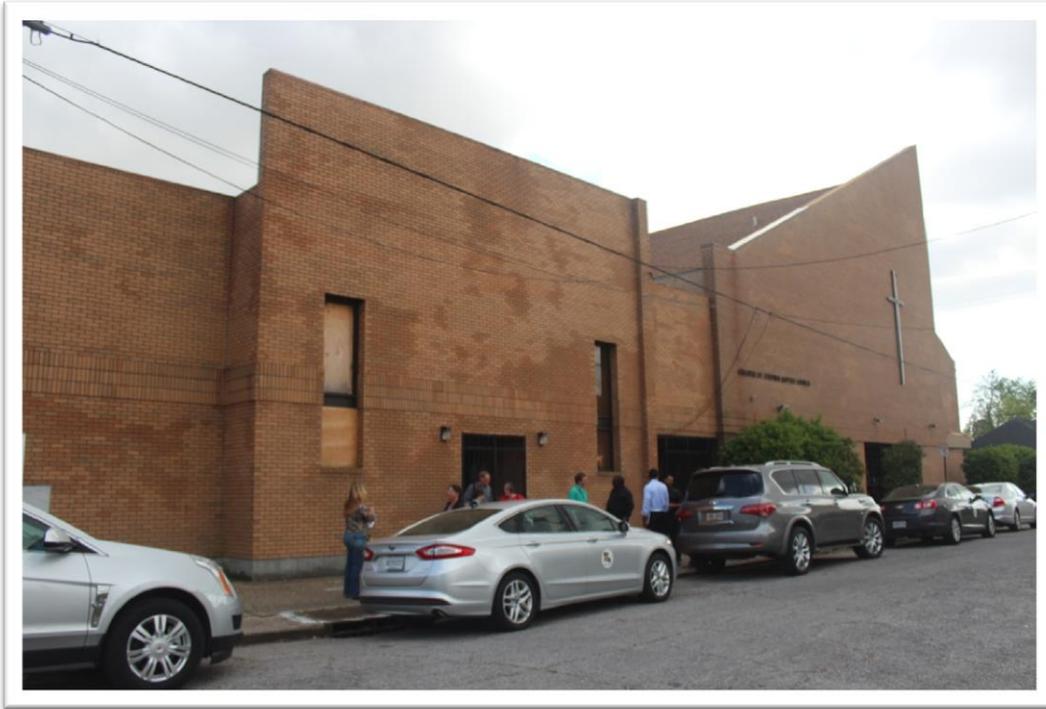
U.S. Environmental Protection Agency. 2013. Letter Correspondence from Raul Gutierrez, Wetlands Section, Water Quality Protection Division, Dated August 27, 2013.

U.S. Fish and Wildlife Service. Information, Planning, and Conservation (IPaC) online system. Accessed June 2014 at: <http://ecos.fws.gov/ipac/>

U.S. Fish and Wildlife Service. 2013. Letter Correspondence from Deborah Fuller, Acting Supervisor, Louisiana Field Office, Dated August 27, 2013.

U.S. Fish and Wildlife Service. 2014. National Wetlands Inventory Maps. Available at: <http://www.fws.gov/wetlands/Data/mapper.html>

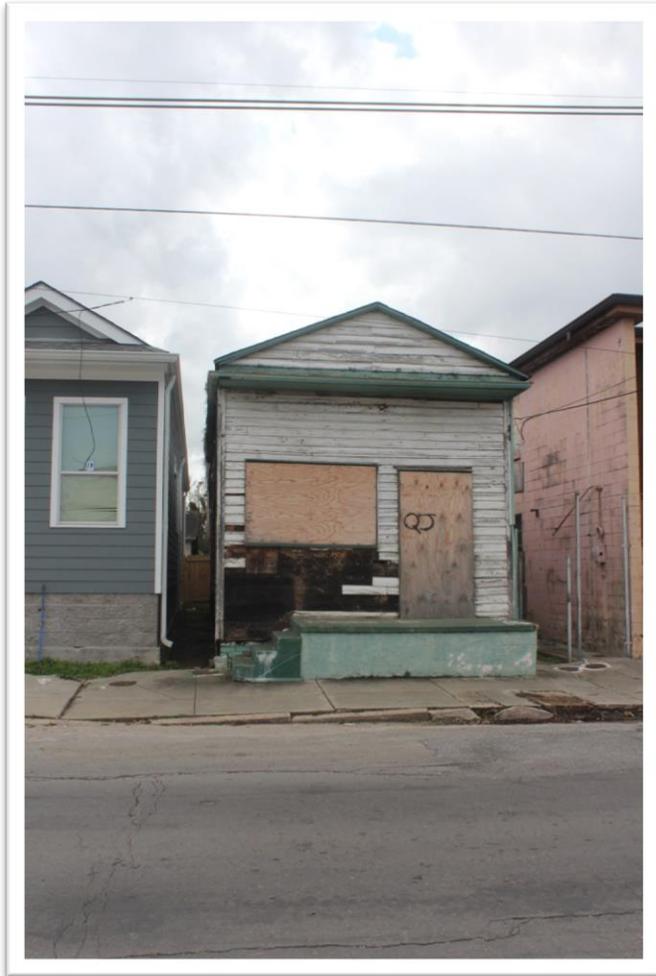
Appendix A
Site Photographs



Photograph 1 – Greater St. Stephen Church Front



Photograph 2 - Greater St. Stephen Church East Side of Building



Photograph 3 – 2224 Philip Street Adjacent to the Rear of Greater St. Stephen Church

Appendix B
Floodplain and Wetland
8-Step Planning Documentation

Paul S. Morton Scholarship Foundation (PSMSF) – Alternate Project
Education Building Consolidation
AI #2129
Development in Areas Levee Protected from the Base Flood
FEMA 1603-DR-LA

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

8-STEP PROCESS CHECKLIST

Date: 8/4/2013

Prepared By: John Renne, CFM, Environmental Specialist

Project: Hurricane Katrina, DR-1603, impacted Orleans Parish, Louisiana and resulted in a presidentially declared major disaster. Hurricane Katrina made final landfall near the New Orleans area with sustained winds estimated at 120 mph. Floodwaters associated with the storm inundated the Paul S. Morton Scholarship Foundation (PSMSF) site with close to 5 feet of water and destroyed 95% of the complex's contents. This project proposes improvements (i.e. addition, renovations) to the PSMSF's Greater St. Stephen Church. Prior to Katrina, this facility was used for religious services.

The applicant proposes to establish the Great Works Life Family Center and Child Care Center at 2308 S. Liberty Street and 2224 Philip Street, by purchasing and renovating 2308 S. Liberty Street (formerly Greater St. Stephen Church) and by purchasing, demolishing, and developing 2224 Philip Street. The 19,500 sf buildings at 2308 S. Liberty will undergo extensive renovations to the interior and exterior. Exterior work includes the removal of vegetation and debris, cleaning and painting of exterior CMU walls, the installation of new soffits, window glazing, security and landscape lighting, fencing, relocation of the HVAC to the rooftop, installation of a soft surface over the existing parking lot for use as a playground, and installation of a new water line. The interior will be extensively renovated, including all new finish materials, walls, and mechanical, electrical, and plumbing systems, and a small elevator will be added on the interior.

Public Assistance grant funded projects carried out in the floodplain or affecting the floodplain must be coordinated with the local floodplain administrator for a floodplain development permit prior to the undertaking and the action must be carried out in compliance with relevant, applicable and required local codes and standards; thereby, reducing the risk of future flood loss, minimizing the impacts of floods on safety, health, and welfare, and preserving/restoring beneficial floodplain values as required by Executive Order 11988.

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

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

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

Preliminary Digital Flood Insurance Map Panel 22071C0229F, dated 11/9/2012, places this project in Zone "Shaded X," levee protected from the base flood. ABFE Map LA-CC31, dated 6/5/2006, places this project in an ABFE -1.5 feet NGVD 29 or 3 feet highest existing adjacent grade (HEAG).

*NGVD 29 = National Geodetic Vertical Datum of 1929

The project is located in a wetland as identified by:

A review of the U.S. Fish and Wildlife National Wetland Inventory indicates the proposed project location is not located in a mapped wetland or U.S. jurisdictional waters.

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

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

Applicable - Notice will be or has been provided by:

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

Advocate, Lafayette Daily Advertiser, Lake Charles American Press and the Hammond Star on November 7th - November 9th, 2005.

Furthermore, a National Environmental Policy Act (NEPA) Environmental Assessment (EA) has been drafted to determine if the proposed improvements, as described, will have the potential for significant adverse effects on the quality of the human and natural environment. The results of the investigation are being used to make a decision whether to initiate preparation of an Environmental Impact Statement or to prepare a Finding of No Significant Impact. The availability of the Draft EA was advertised in the *Times Picayune*, a Parish publication, on August 25, 2014. The Draft EA was also provided to the Orleans Main Branch Library in New Orleans and made available on the FEMA website, at <http://www.fema.gov/media-library>, for public inspection and invited comments to be submitted with instructions for submission.

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

- Not applicable - Project is not located in a floodplain or in a wetland.
- Applicable - Alternatives identified as described below:
 - **Alternative 1: No Action** – No action would leave the Applicant’s abilities to provide educational and family services to the public diminished due to damages caused by Hurricane Katrina. No action would not meet the purpose and need and therefore, will not be further evaluated.
 - **Alternative 2: Repair Damaged Facility to Pre-Disaster Condition** - This alternative would repair the damaged Christian Academy to the pre-disaster configuration, function, and capacity in substantially the same footprint in order to restore the facility as it existed prior to Hurricane Katrina. Reconstruction in the same footprint would not meet the purpose and need and therefore, will not be further evaluated.
 - **Alternative 3: Purchase, Renovate, and Relocate to an Alternate Site** - The applicant proposes to establish the Great Works Life Family Center and Child Care Center at 2308 S. Liberty Street and 2224 Philip Street, by purchasing and renovating 2308 S. Liberty Street (formerly Greater St. Stephen Church) and by purchasing, demolishing, and developing 2224 Philip Street. The 19,500 sf buildings at 2308 S. Liberty will undergo extensive renovations to the interior and exterior. Exterior work includes

the removal of vegetation and debris, cleaning and painting of exterior CMU walls, the installation of new soffits, window glazing, security and landscape lighting, fencing, relocation of the HVAC to the rooftop, installation of a soft surface over the existing parking lot for use as a playground, and installation of a new water line. The interior will be extensively renovated, including all new finish materials, walls, and mechanical, electrical, and plumbing systems, and a small elevator will be added on the interior.

STEP 4 Identify the full range or potential direct or indirect impacts associated with, the occupancy or modification of floodplains and wetlands and the potential direct and indirect support of floodplain and wetland development that could result from the proposed action (see 44 CFR 9.10).

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

Applicable - Alternatives identified as described below:

Alternative 3: This alternative consists of the expansion and renovation of a facility located in an area levee protected from the base flood and, therefore, includes the loss of potential floodwater storage and conveyance area and, additionally, investment at risk subject to damage during future flood events. Facilities damaged in future flooding may result in the need for disaster assistance. However, incorporation of construction methods that meet the local floodplain ordinance will likely reduce risk and protect against future flood damage.

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

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

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

Alternative 3: Construction shall be in accordance with local floodplain ordinances with applicable codes and standards applied to mitigate and minimize adverse effects (compliance with minimum National Flood Insurance Program standards and requirements). Accordingly, per 44 CFR 9.11(d)(3), there shall be no new construction or substantial improvement of structures unless the lowest floor of the structures (including basement) is at or above the level of the base flood. Furthermore, per 44 CFR 9.11(d)(6), no project should be built to a floodplain management standard that is less protective than what the

community has adopted in local ordinances through their participation in the National Flood Insurance Program. The replacement of building contents, materials and equipment, where possible, disaster-proofing of the building and/or elimination of such future losses should occur by relocation of those building contents, materials and equipment outside or above the base floodplain.

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

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

The proposed action is the chosen practicable alternative based upon a review of possible adverse effects on the floodplain and community and socioeconomic expectations.

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

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

A National Environmental Policy Act (NEPA) Environmental Assessment (EA) has been drafted to determine if the Proposed Action will have the potential for significant adverse effects on the quality of the human and natural environment. The results are being used to make a decision whether to initiate preparation of an Environmental Impact Statement (EIS) or to prepare a Finding of No Significant Impact. The availability of the Draft EA and this 8-step for public review will be announced in the Parish newspaper. A 15 day comment period will follow the Public Notice publication.

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

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

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

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

Appendix C
Public Notice/Finding of No Significant Impact

**PUBLIC NOTICE OF AVAILABILITY
DRAFT ENVIRONMENTAL ASSESSMENT AND
DRAFT FINDING OF NO SIGNIFICANT IMPACT FOR
ALTERNATE PROJECT FOR THE PAUL S. MORTON SCHOLARSHIP FOUNDATION
COMMUNITY CENTER BUILDING**

Interested parties are hereby notified that the Federal Emergency Management Agency (FEMA) prepared an Environmental Assessment (EA) for a proposed renovation and expansion of the Paul S. Morton Scholarship Foundation (PSMSF) Community Center Building, located at 2308 S. Liberty St. and 2224 Philip Street, New Orleans, Louisiana (Latitude: 29.9359, Longitude: -90.8646). This facility has been purchased by the PSMSF and is proposed to be renovated and improved. The Applicant (i.e. Paul S. Morton Scholarship Foundation) seeks federal grant funds for this action eligible under a Presidential Disaster Declaration, signed on August 29, 2005 (FEMA-1603-DR-LA).

The applicant proposes to establish the Great Works Life Family Center and Child Care Center by purchasing and renovating 2308 S. Liberty Street (formerly Greater St. Stephen Church) and by purchasing, demolishing, and developing 2224 Philip Street. The 19,500 square foot buildings will undergo extensive interior and exterior renovations. Exterior work includes the removal of vegetation and debris, cleaning and painting of CMU walls, installation of new soffits, window glazing, security and landscape lighting, fencing, relocation of the HVAC to the rooftop, installation of a soft surface over the existing parking lot for use as a playground, and installation of a water line. The interior will be extensively renovated, including new finish materials, walls, and mechanical, electrical, and plumbing systems, and a small elevator will be added. In addition to these renovations, the applicant proposes to demolish the former residence located at 2224 Philip Street in order to construct a new grease trap and install a concrete pad for an elevated emergency generator.

Per the National Environmental Policy Act (42 U.S.C. 4371 *et seq.*), and associated environmental statutes, a Draft EA has been prepared to evaluate the action's potential impacts on the human and natural environment. This Draft EA summarizes the purpose and need, site selection process, affected environment, and potential environmental consequences associated with the proposed action.

The public comment period will be 15 days, beginning on August 25, 2014, and concluding on September 8, 2014. Written comments on the Draft EA or related matters can be faxed to FEMA's Environmental and Historic Preservation (EHP) Section in the Louisiana Recovery Office at (504) 330-7476; or mailed to FEMA EHP-Louisiana Recovery Office, 1500 Main Street, Baton Rouge, Louisiana 70802. The Draft EA can be viewed and downloaded from FEMA's website: <http://www.fema.gov/media-library/search/PSMSF>. A public notice will be published for 5 days in the Parish newspaper, The Times Picayune, on August 27, August 29, and August 31, 2014, announcing the availability of the Draft EA for public review at the Orleans Parish Main Branch Library at 219 Loyola Avenue, New Orleans, Louisiana 70112 (hours are 10:00 AM to 6:00 PM, Mon.-Thurs. and 10:00 AM to 5:00PM Fri.-Sat.).

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

If no substantive comments are received, the Draft EA and associated Finding of No Significant Impact (FONSI) will become final and this initial Public Notice will also serve as the final Public Notice. Substantive comments will be addressed as appropriate in the final documents.



FEMA

U.S. Department of Homeland Security
Louisiana Recovery Office
1100 Robert E. Lee Boulevard
New Orleans, Louisiana 70124

**FINDING OF NO SIGNIFICANT IMPACT
PAUL S. MORTON SCHOLARSHIP FOUNDATION
CHANGE OF LOCATION ALTERNATE PROJECT
NEW ORLEANS, ORLEANS PARISH, LOUISIANA
*FEMA-1603-DR-LA***

Background

On August 29, 2005, floodwaters caused by Hurricane Katrina inundated the Greater St. Stephen Church's Education and Administration Building, located at 11110 Read Boulevard, New Orleans, Louisiana. Prior to Hurricane Katrina, this facility was used for a school, office space, and community outreach classes. Additionally, the facility was also used to administer the Paul S. Morton Scholarship Foundation's (the Applicant or PSMSF's) Scholarship Programs. The PSMSF program is a support service available to families and has two primary objectives: 1) provide for primary education, and 2) provide education scholarships for disadvantaged children.

The Applicant has requested, through the State of Louisiana Governor's Office of Homeland Security and Emergency Preparedness (the Grantee or GOHSEP) that FEMA provide disaster assistance through the provision of federal grant funding pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), PL 93-288, as amended. Section 406 of the Stafford Act authorizes FEMA's Public Assistance (PA) Program to fund projects to repair, restore, and replace facilities damaged as a result of the declared event. The Applicant has determined that repair of the damaged facilities to their pre-Katrina specifications would not be in the best interest of the community. Consequently, in accordance with 44 Code of Federal Regulations (CFR) Section 206.203(d), the PSMSF has requested a Change of Location Alternate Project. A Change of Location Alternate Project is any project where the applicant determines that the public welfare would not be best served by restoring a damaged facility or its function. In this circumstance, the applicant may request approval of an alternate project from FEMA through the Grantee.

Pursuant to the Council on Environmental Quality's Implementing Procedures for NEPA at 40 CFR 1506.3, and in accordance with 44 CFR Part 10, FEMA regulations to implement the National Environmental Policy Act (NEPA), an Environmental Assessment (EA) was prepared. The alternatives considered include: 1) No Action, 2) Repair Damaged Facility to Pre-Disaster Condition, 3) Purchase, Renovate, and Relocate to an Alternate Site (Proposed Action).

Proposed Action

The Greater St. Stephen facilities suffered damages resulting from Hurricane Katrina and, subsequently, have been sold and demolished. The damage caused by Hurricane Katrina greatly reduced the Applicant's ability to provide needed services to the local community. Restoration of these services is necessary for the community to fully recover from the impact of the storm. The purpose of this project is to restore and improve community access to quality community and family services. The need for the project is defined by the Applicant's current lack of functioning facilities.

The applicant proposes to establish the Great Works Life Family Center and Child Care Center at 2308 S. Liberty Street and 2224 Philip Street, by purchasing and renovating 2308 S. Liberty Street (formerly Greater St. Stephen Church) and by purchasing, demolishing, and developing 2224 Philip Street. The facilities will undergo extensive interior and exterior renovations. Exterior work includes the removal of vegetation and debris, cleaning and painting of exterior CMU walls, the installation of new soffits, window glazing, security and landscape lighting, fencing, relocation of the HVAC to the rooftop, installation of a soft surface over the existing parking lot for use as a playground, and installation of a new water line. The interior will be extensively renovated, including all new finish materials, walls, and mechanical, electrical, and plumbing systems. A small elevator will be added on the interior.

Agency Coordination, Public Review, and Comment

FEMA's Draft EA can be viewed and downloaded from FEMA's website at: www.fema.gov/media-library/search/. A public notice will be published for 5 days in the Parish newspaper, *The Times Picayune*, from August 27, 29, and 31, 2014, announcing the availability of the Draft EA for public review at the Orleans Parish Main Branch Library, located at 219 Loyola Avenue, New Orleans, Louisiana 70112 (hours are 10:00 AM to 6:00 PM, Mon.-Thurs. and 10:00 AM to 5:00PM Fri.-Sat.).

In preparing the EA, FEMA coordinated with federal, state and local agencies including the Louisiana State Historical Preservation Officer (SHPO), U.S. Fish and Wildlife Service, the Governor's Office of Homeland Security and Emergency Preparedness, Louisiana Department of Environmental Quality (LDEQ), Louisiana Department of Wildlife and Fisheries, U.S. Environmental Protection Agency, Louisiana Department of Natural Resources (LDNR), and the U.S. Army Corps of Engineers (USACE). A public notice of the Applicant's intent to construct the proposed project and regarding the availability of the Environmental Assessment, and to request public comment on the project, was published in the local newspaper, *The Times Picayune*, on August 27, 29, and 31 2014. No public comments were received.

Findings

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

Conditions

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

- The Applicant must follow all applicable local, state, and federal laws, regulations, and requirements and obtain and comply with all required permits and approvals prior to initiating work.
- Applicant shall comply with all local, state, and federal requirements related to sediment control, disposal of solid waste, control and containment of spills, and discharge of surface runoff and stormwater from the site.
- If the project results in a discharge to waters of the State, a Louisiana Pollution Discharge Elimination System (LPDES) permit may be required in accordance with the Clean Water Act and the Louisiana Clean Water Code. If the project results in a discharge of wastewater to an existing wastewater treatment system, that wastewater treatment system may need to modify its LPDES permit before accepting the additional wastewater. In order to minimize indirect impacts (erosion, sedimentation, dust and other construction-related disturbances) to the nearby waters of the United States and well defined drainage areas surrounding the contractor should ensure compliance with all local, state, and federal requirements related to sediment control, disposal of solid waste, control and containment of spills, and discharge of surface runoff and stormwater from the site. All documentation pertaining to these activities and Applicant compliance with any conditions should be forwarded to the State and FEMA for inclusion in the permanent project files.
- The project has been found by the Louisiana Department of Natural Resources (LDNR) to be inside the Louisiana Coastal Zone. LDNR, therefore requires that a complete Coastal Use Permit Application package (Joint Application Form, locality maps, project illustration plats with plan and cross section views, etc.) along with the appropriate application fee, be submitted to their office prior to construction. The Applicant is responsible for coordinating with and obtaining any required Coastal Use Permit(s) (CUP) or other authorizations from the LDNR Office of Coastal Management's Permits and Mitigation Division prior to initiating work. The Applicant must comply with all conditions of the required permits. All documentation pertaining to

these activities and Applicant compliance with any conditions should be forwarded to the State and FEMA for inclusion in the permanent project files.

- Per 44 CFR 9.11(d)(3), there shall be no new construction or substantial improvement of structures unless the lowest floor of the structures (including basement) is at or above the level of the base flood. Furthermore, per 44 CFR 9.11(d)(6), no project should be built to a floodplain management standard that is less protective than what the community has adopted in local ordinances through their participation in the National Flood Insurance Program. The Applicant is required to coordinate with the local floodplain administrator regarding floodplain permit(s) prior to the start of any activities. All documentation pertaining to these activities and Applicant compliance with any conditions should be forwarded to the LA GOHSEP and FEMA for inclusion in the permanent project files. Per 44 CFR 9.11(d)(9), for the replacement of building contents, materials and equipment, where possible, disaster-proofing of the building and/or elimination of such future losses should occur by relocation of those building contents, materials and equipment outside or above the base floodplain.
- Equipment and machinery utilized on the project site must meet all local, state, and federal noise regulations.
- All activities must be conducted in a safe manner in accordance with OSHA work zone traffic safety requirements.
- The Applicant will not remove the concrete slab or disturb the bricked area in the rear of the lot at 2224 Philip Street.
- The Applicant will demolish the 2224 Phillip Street building without salvaging sub-grade elements unless required to ensure a safe site and will generally limit the ground disturbance associated with the demolition.
- Louisiana Unmarked Human Burial Sites Preservation Act: If human bone or unmarked grave(s) are present within the project area, compliance with the Louisiana Unmarked Human Burial Sites Preservation Act (R.S. 8:671 et seq.) is required. The applicant shall notify the law enforcement agency of the jurisdiction where the remains are located within twenty-four hours of the discovery. The applicant shall also notify FEMA and the Louisiana Division of Archaeology at 225-342-8170 within seventy-two hours of the discovery.
- Inadvertent Discovery Clause: If during the course of work, archaeological artifacts (prehistoric or historic) are discovered, the applicant shall stop work in the vicinity of the discovery and take all reasonable measures to avoid or minimize harm to the finds. The applicant shall inform their Public Assistance (PA) contacts at FEMA, who will in turn contact FEMA Historic Preservation (HP) staff. The applicant will not proceed with work until FEMA HP completes consultation with the SHPO, and others as appropriate.

- Any changes or modifications to the proposed project would require a revised USACE determination. Off-site locations of activities such as borrow, disposals, haul-and detour-roads and work mobilization site developments may be subject to the USACE regulatory requirements.
- Hazardous materials associated with construction equipment should be handled according to local, state, and federal regulations in order to minimize the risk of spills and leaks and subsequent impacts to surface and groundwater resources.
- Unusable equipment, debris and material shall be disposed of in an approved manner and location. The Applicant shall handle, manage, and dispose of petroleum products, hazardous materials and/or toxic waste in accordance with all local, state, and federal agency requirements. All documentation pertaining to these activities should be forwarded to the State and FEMA as part of the permanent project files.
- The Applicant is responsible for complying with the Toxic Substances Control Act (TSCA) Section 402(c) requirements. All documentation pertaining to these activities should be forwarded to the State and FEMA as part of the permanent project files.
- If any asbestos containing materials and/or other hazardous materials are found during remediation or repair activities, the Applicant shall comply with all federal, state and local abatement and disposal requirements under the National Emissions Standards for Hazardous Air Pollutants (NESHAP) and Louisiana Administrative Code 33:III 5151. Demolition activities related to Possible Asbestos-Containing Materials (PACM) must be inspected for ACM/PACM where it is safe to do so. Should asbestos containing materials (ACM) be present, the Applicant is responsible for ensuring proper disposal in accordance with relevant requirements. Demolition activity notification must be sent to the LDEQ before work begins. All documentation pertaining to these activities should be forwarded to the State and FEMA as part of the permanent project files.
- All demolition and renovation activities must be coordinated with the LDEQ prior to initiating work. All documentation pertaining to these activities and Applicant compliance with any conditions should be forwarded to the State and FEMA for inclusion in the permanent project files.

Conclusion

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

Appendix D
Project Plans

RENOVATION AND REPAIR

2308 S. LIBERTY STREET
NEW ORLEANS, LOUISIANA

FOR

GREATER WORKS COMMUNITY CENTER

A PROJECT OF THE PAUL S. MORTON SCHOLARSHIP FOUNDATION



DESIGN REPORT

PREPARED BY

PAUL S. MORTON SCHOLARSHIP FOUNDATION
AND
CADSEL DESIGN

12 DECEMBER 2013

GREATER WORKS COMMUNITY CENTER

FEMA DISASTER #1603

OVERVIEW

- The project consists of the renovation and repair of an existing building of approximately 19,900 SF. The property fronts on S. Liberty Street and is bounded by First Street and Philip Street (see enclosed vicinity plan).
- The occupancy of the building was educational/assembly. The occupancy of the proposed Greater Works Community Center will be educational/assembly. No change in occupancy is required.
- The proposed community center is a project of the Paul S. Morton Scholarship Foundation.

REPORT OUTLINE

- The report consists of the following sections:
 - Executive Summary of proposed Greater Works Community Center
 - Scope of renovation and repair work
 - Vicinity Plan
 - Site Plan indicating all areas of disturbed work and available parking
 - First Floor Plans of Auditorium and Annex Building
 - Second Floor Plans of Auditorium and Annex Building
 - Exterior Elevations of buildings indicating proposed work (there are no anticipated modifications to any elevations).
 - Site photographs indicating scope of work (removal of non-working equipment, cleaning of trash and area to be dedicated as playground for child care programs).
 - Project Resource Information (data sheets on selected materials and equipment); separate report

EXECUTIVE SUMMARY

- The proposed project will be the development and operation of a mid-city community center. The facility will be open to the public for community related functions.

- The center will serve as the location for several functions including but not limited to the following:
 - Fully operational and licensed Child Care Center for up to 48 children, to be located in rooms 101 through 106, full equipped kitchen, nurse office, and a common area to be used for dining and general activities.
 - DHH Licensed feeding center for the poor and hungry, including DHH licensed food drives, food bank and food giveaway. Giveaways, drives and feeding to be conducted in the auditorium.
 - Licensed Day Care and Early Childhood Development.
 - Licensed Before and After-School Tutorial Programs.
 - Marriage/Family Counseling and Workshops.
 - Licensed Substance Abuse Counseling.
 - Scheduled medical screening by licensed health care professionals in conjunction with various local rehabilitation centers as required.
 - Neighborhood General Forums to address items such as reduction in crime, unemployment, and neighborhood revitalization.

- Community services will include, but not be limited to the following:
 - Organizing neighborhood clean-up projects.
 - Organizing meetings between local government and community members.
 - Organizing food, blood, and clothes drives, as well as other similar events/functions.
 - Rental of facility for weddings, baby showers and other similar events.

- Parking is provided on surrounding streets. Overflow/additional parking is provided in three areas indicated on the site plan through contract with the property owners of those areas. Capacity of the three areas is approximately 100 cars. The facility is also located on a major bus route, thereby providing access by public transportation. Bike racks will also be provided for storage of bicycles.

GREATER WORKS COMMUNITY CENTER

FEMA DISASTER # I 603

OVERVIEW

- This project consists of the renovation and repair of an existing building of approximately 19,900 SF. The property fronts on S. Liberty Street and is bounded by First Street and Philip Street (see enclosed vicinity plan).
- The occupancy of the building was educational/assembly. The occupancy of the proposed Greater Works Community Center will be educational/assembly. No change in occupancy is required.
- The proposed community center is a project of the Paul S. Morton Scholarship Foundation.

REPORT OUTLINE

- The report consists of the following sections:
 - Executive Summary of proposed Greater Works Community Center
 - Scope of renovation and repair work
 - Vicinity Plan
 - Site Plan indicating all areas of disturbed work and available parking
 - First Floor Plans of Auditorium and Annex Building
 - Second Floor Plans of Auditorium and Annex Building
 - Exterior Elevations of buildings indicating proposed work (there are no anticipated modifications to any elevations).
 - Site photographs indicating scope of work (removal of non-working equipment, cleaning of trash and area to be dedicated as playground for child care programs).
 - Project Resource Information (data sheets on selected materials and equipment); separate report

EXECUTIVE SUMMARY

- The proposed project will be the development and operation of a mid-city community center. The facility will be open to the public for community related functions.
- The center will serve as the location for several functions including but not limited to the following:
 - Fully operational and licensed Child Care Center for up to 48 children, to be located in rooms 101 through 106, full equipped kitchen, nurse office, and a common area to be used for dining and general activities.
 - DHH Licensed feeding center for the poor and hungry, including DHH licensed food drives, food bank and food giveaway. Giveaways, drives and feeding to be conducted in the auditorium.
 - Licensed Day Care and Early Childhood Development.
 - Licensed Before and After-School Tutorial Programs.
 - Marriage/Family Counseling and Workshops.
 - Licensed Substance Abuse Counseling.
 - Scheduled medical screening by licensed health care professionals in conjunction with various local rehabilitation centers as required.
 - Neighborhood General Forums to address items such as reduction in crime, unemployment, and neighborhood beautification.
- Community services will include, but not be limited to the following:
 - Organizing neighborhood clean-up projects.
 - Organizing meetings between local government and community members.
 - Organizing food, blood, and clothes drives, as well as other similar events/functions.
 - Rental of facility for weddings, baby showers and other similar events.
- Parking is provided on surrounding streets. Overflow/additional parking is provided in three areas indicated on the site plan through contract with the property owners of those areas. Capacity of the three areas is approximately 100 cars. The facility is also located on a major bus route, thereby providing access by public transportation. Bike racks will also be provided for storage of bicycles.

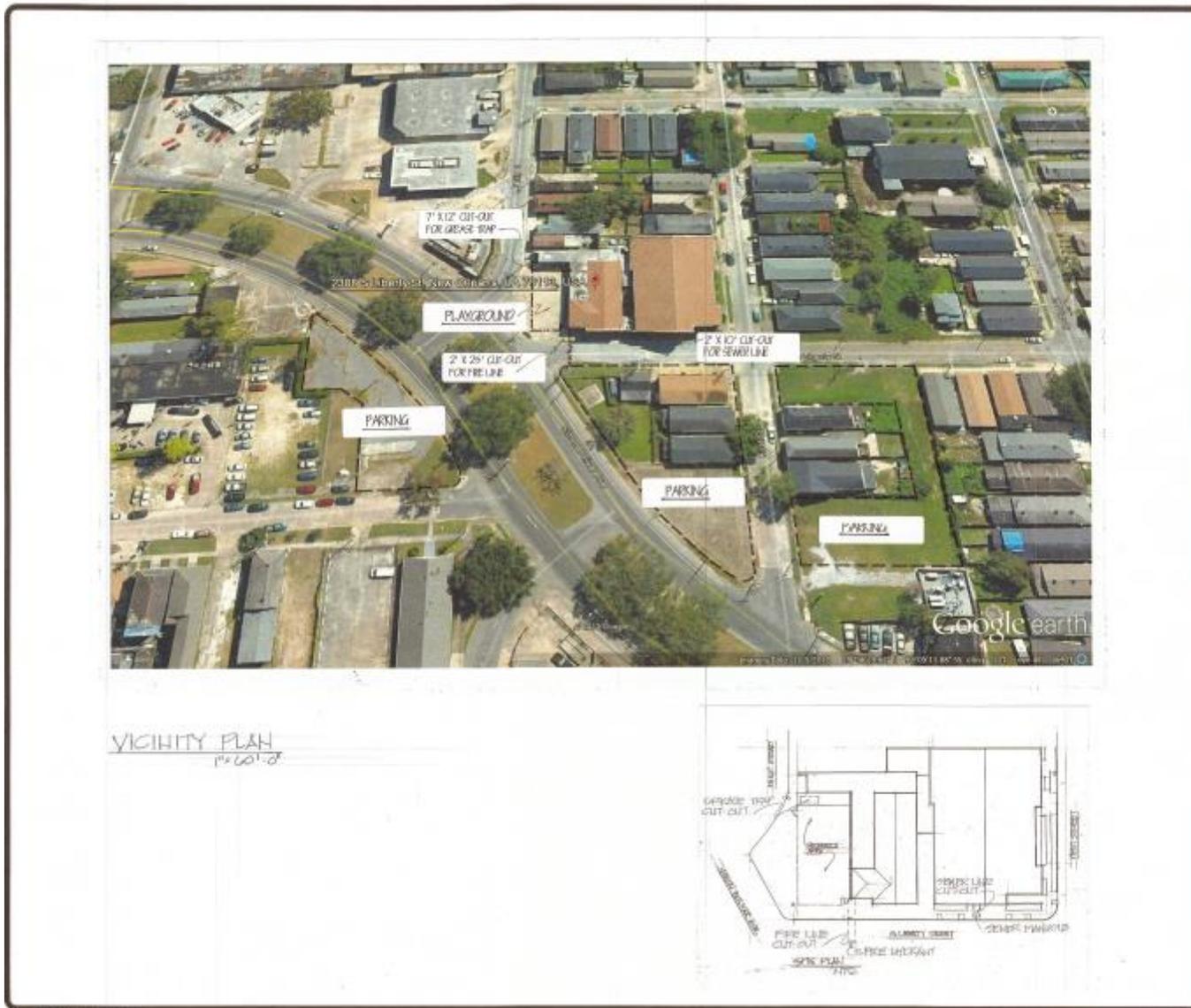
SCOPE OF RENOVATION AND REPAIR WORK

- The proposed scope of renovation and repair work includes the following:
 - The existing structure is laminated wood and is in good condition.
 - The exterior walls are composed of brick and CMU (concrete masonry units). Exterior walls will be cleaned (pressure washed) as required and CMU repaired. The exterior walls are in good condition.
 - Install any new required fire blocking within walls on all floors.
 - Install new flooring and base throughout the facility. Flooring types include ceramic tile, VCT flooring and carpet. Base to be 1" x 6" wood throughout the facility.
 - Install new metal handrails on all stairs.
 - Install new gypsum board walls as indicated on the plans. All walls to be constructed in accordance with the required fire rating requirements as indicated on the plans.
 - Tape, float, finish and paint all new walls.
 - Paint and/or finish all wood doors and trim.
 - Install new wood paneled exterior doors and associated hardware.
 - Install new interior doors, both wood paneled and metal, and associated hardware.
 - Install new humidity resistant suspended acoustical ceiling where indicated on plans.
 - Install new gypsum board ceilings where indicated on plans.
 - Install new moisture resistant soffit where indicated on plans.
 - Replace all exterior glazing on all sides of the building with laminated glass.
 - Replace all interior glazing.
 - Install new LULA (limited use/limited access) elevator.
 - Install new plumbing fixtures in all bathrooms. Add fixtures as indicated on the plans.
 - Install new fixtures in janitors' closets.
 - Install new triple compartment sink and hand washing sink. Install new upper and lower cabinets in the kitchen. Install new appliances including range, vent hood, microwave, dishwasher and refrigerator.
 - Install grease trap as required by code.
 - Install new sprinkler system and connection to fire hydrant.
 - Install new electrical service meeting current codes. Service to be 277/480. Rewire entire facility. Install new receptacles as indicated on the plans.
 - Existing conduit from transformers on pole to be re-used. Existing electrical pole has empty transformer spaces to accommodate new 277/480 V service.
 - Install new lighting throughout the interior. Install new security lighting on the exterior walls. All lighting to be LED.

- Install new LED landscape/pathway lighting around building.
 - Install new fire alarm system.
 - Install new security system, indoor and outdoor, as required for safety.
 - Install new HVAC system including new ductwork. Install all grilles.
 - Install new interior signage as necessary.
 - Install new fencing as indicated on site plan for new recreation area.
- The proposed scope of demolition work includes the following:
 - Remove all overgrowth from all buildings.
 - Remove all miscellaneous debris and trash on entire property site.
 - Remove all existing exterior glazing.
 - Remove all existing exterior fencing.
 - Remove all trash from interior.
 - Remove all existing electrical wiring, conduit, panels, meter pans, disconnects, electrical devices, phone lines, cable junction boxes, exterior boxes and unused exterior cable.
 - Remove all existing A/C condensing units, condensing lines, air handler units, ductwork, registers and return air grilles.
 - Clean all dust and dirt from all surfaces. Soda ash blasting to be used in interior spaces. Exterior CMU to be pressured washed.
 - The proposed renovations for interior walls, electrical, mechanical and fire alarm will be designed to meet the IBC 2009, NFPA 101 Life Safety Code, ADA and Department of Health requirements.
 - Attention will be given to making the building energy efficient in all phases – building envelope, mechanical and electrical.
 - The project includes the addition of an environmentally approved emergency power provision so that during any power outages the facility can be used by the local residents for daytime activities and food services.

CONCLUSION

- It is the hope of the Owner that with the proposed improvements to the building located at 2300 S. Liberty Street the Greater Works Community Center will provide quality and continued community center functions to help in the development and growth of the people and neighborhoods. The proposed center is located in the heart of New Orleans and well positioned for positive growth and response for all people in New Orleans and the surrounding areas.

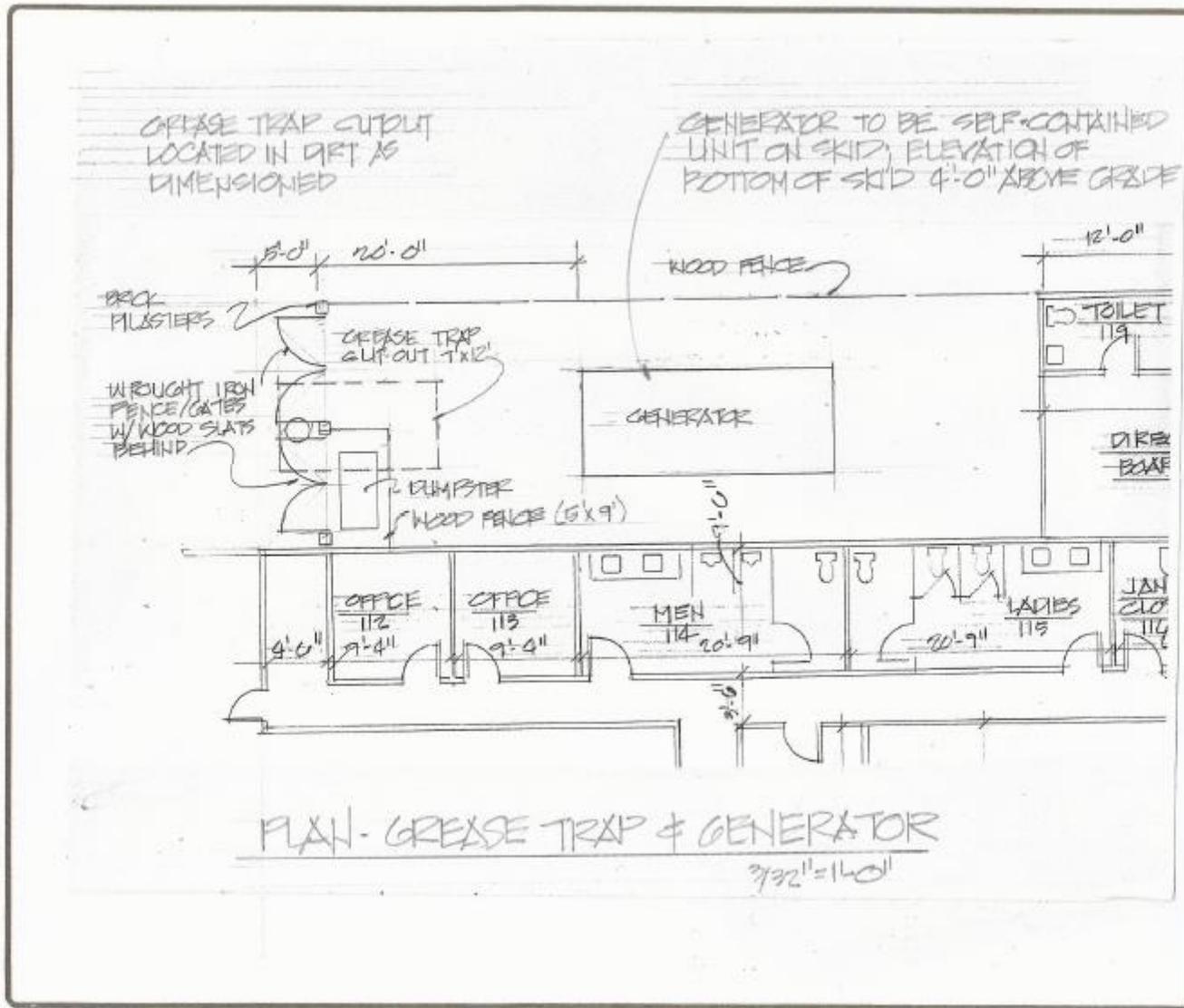


REVISIONS	BY

GREATER WORKS COMMUNITY CENTER
 A PROJECT OF THE PAUL S. MORTON SCHOLARSHIP FOUNDATION
 1340 LIBERTY STREET
 CLAUDIA E. SELIGMAN ARCHITECT
 MONROE, LOUISIANA 70001
 GABRIEL DEBON
 WYCKWOOD, CT

DRAWN	CS
CHECKED	
DATE	10/1/13
SCALE	NOTED
JOB NO.	
SHEET	SP.1
OF SHEETS	

Paul S. Morton Scholarship Foundation Change of Location Alternate Project
 Draft Environmental Assessment (August 2014)



REVISIONS	BY

GREATER WORKS COMMUNITY CENTER
 A PROJECT OF THE PAUL S. MORTON SCHOLARSHIP FOUNDATION
 400 LIBERTY STREET
 NEW ORLEANS, LOUISIANA
 CLAUDIA E. SELIGMAN, ARCHITECT
 1401 PINE
 NEW ORLEANS, LOUISIANA 70112

DESIGN	CAD
DATE	5.19.14
SCALE	AS SHOWN
JOB NO.	
SHEET	SK.1

Appendix E
Agency Correspondence