



# 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/](http://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 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.

