

Draft Environmental Assessment

# **Southern University of New Orleans Park Campus Construction of Five (5) Buildings**

New Orleans, LA

DR-1603-LA

December 2014



**FEMA**

**U.S. Department of Homeland Security  
Federal Emergency Management Agency, Region VI  
Louisiana Recovery Office  
New Orleans, Louisiana 70126**

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## LIST OF ACRONYMS

ABFE	Advisory Base Flood Elevation
ACM	Asbestos Containing Materials
ADA	American with Disabilities Act
APE	Area of Potential Effect
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
CUP	Coastal Use Permit
CWA	Clean Water Act
CZMA	Coastal Zone Management Act
dB	decibels
DFIRM	Digital Flood Insurance Rate Map
DNL	Day/Night Noise Level
EA	Environmental Assessment
EIS	Environmental Impact Statement
EHP	Environmental Historic Preservation
E.O.	Executive Order
ESA	Endangered Species Act
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FONSI	Finding of No Significant Impact
FPPA	Farmland Protection Policy Act
FWCA	Fish and Wildlife Coordination Act
GCR	General Conformity Rule
HAVC	heating, ventilation, and air conditioning
HEAG	Highest Existing Adjacent Grade
LAC	Louisiana Administrative Code
LA GOHSEP	Louisiana Governor's Office of Homeland Security and Emergency Preparedness
LDEQ	Louisiana Department of Environmental Quality
LDNR	Louisiana Department of Natural Resources
LDWF	Louisiana Department of Wildlife and Fisheries
LPDES	Louisiana Pollutant Discharge Elimination System
LSB	Louisiana State Brownfield
msl	mean sea level
NAAQS	National Ambient Air Quality Standards
NAAs	Non-Attainment Areas
NAVD 88	North American Vertical Datum of 1988
NEPA	National Environmental Policy Act
NFIP	National Flood Insurance Program

NGVD 29	National Geodetic Vertical Datum of 1929
NHPA	National Historic Preservation Act
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
OSHA	Occupational Safety and Health Administration
OPA	Otherwise Protected Areas
PA	Public Assistance/ Programmatic Agreement
PACM	Possible Asbestos Containing Materials
PCBS	polychlorinated biphenyls
PL	Public Law
RCRA	Resource Conservation and Recovery Act
RHA	Rivers and Harbors Act
SDWA	Safe Drinking Water Act
sf	square feet
SFHA	Special Flood Hazard Area
SHPO	State Historic Preservation Office/Officer
SPOC	Single-Point-of-Contact
SOV	Solicitation of Views
SUNO	Southern University of New Orleans
THPO	Tribal Historic Preservation Officer
TSCA	Toxic Substance Control Act
USACE	United States Army Corps of Engineers
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service

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## **1.0 INTRODUCTION**

### **1.1 Project Authority**

Hurricane Katrina, a Category three (3) hurricane with a storm surge above normal high tide levels, moved across the Louisiana, Mississippi, and Alabama Gulf Coasts on August 29, 2005. Maximum sustained winds at landfall were estimated at 140 miles per hour. President George W. Bush declared a major disaster for the state of Louisiana due to damages from Hurricane Katrina and signed a disaster declaration (FEMA-1603-DR-LA) on August 29, 2005, authorizing the Department of Homeland Security's Federal Emergency Management Agency (FEMA) to provide federal assistance in designated areas of Louisiana. FEMA is administering this disaster assistance pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), PL 93-288, as amended. Section 406 of the Stafford Act authorizes FEMA's Public Assistance (PA) Program to repair, restore, and replace state and local government and certain private nonprofit facilities damaged as a result of the declared event.

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

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

### **1.2 Background**

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

Southern University of New Orleans (SUNO), founded in 1956, is located on two (2) campuses, the Park campus and the Lake campus, in the Gentilly area of New Orleans. These campuses are within the vicinity of Lake Pontchartrain and the Industrial Canal (Figure 2). The office address is 6400 Press Dr. New Orleans, Louisiana 70126. Park Campus center is at Latitude 30.025808, Longitude -90.044863, and Lake Campus center is at Latitude 30.031019, Longitude -90.044932; divided by Leon C. Simon Blvd. SUNO's mission statement is "Southern University at New Orleans primarily serves the educational and cultural needs of the Greater New Orleans Metropolitan Area. As a public, historically black university, SUNO creates and maintains an environment conducive to learning and growth as well as promotes the upward

mobility of a diverse population of both traditional and nontraditional students through quality academic programs and service to achieve excellence in higher education.”

The Park Campus’s buildings sustained significant flooding during the event. Each building on the campus was extensively damaged. The damage was compounded by standing, brackish, contaminated water that remained for a number of weeks, preventing access to the site.

FEMA has previously approved numerous repair/replacement and mitigation projects on the Park Campus. To date, permanent repairs have occurred to the Health & Physical Education building, the Maintenance building, the Cafeteria, etc. Temporary repairs have occurred to the second and third floors of the Brown Hall building, New Science building, and Multi-Purpose building. Permanent repairs are underway for the Administration building, the Library, and the Student Center. Due to their low elevations, floodwalls are being constructed around the Administration building and the Library, which will protect the buildings against future flooding. The Clark Hall building has been demolished.

Prior to 2005, SUNO did not have buildings on the Lake Campus; however, the site did not sustain flooding during Hurricane Katrina. After Hurricane Katrina, temporary trailers were set up on the Lake Campus to provide temporary classroom and support space for SUNO. Subsequently, the Lake Campus has been developed by SUNO with a student housing complex, Information Technology building, and College of Business building. In January 2014, construction started for the School of Business- Small Business Incubator building.



Figure 1: Orleans Parish, Louisiana



Figure 2: The two (2) SUNO campuses, New Orleans, LA

## 2.0 PURPOSE AND NEED

### 2.1 Purpose

The objective of the PA Program is to provide assistance to State, Tribal, and local governments, and certain types of Private Nonprofit Organizations so that communities can quickly respond to and recover from major disasters or emergencies. Currently, the applicant is conducting classes and other educational functions from temporary facilities on the Park Campus and buildings which temporary repairs were made after Hurricane Katrina. The purpose of the current project

is to permanently restore and enhance educational support services that were lost due to Hurricane Katrina and reduce the risk of future flooding.

## **2.2 Need**

Wind, rain, and flooding from Hurricane Katrina destroyed many of the facilities and functions of SUNO. As the recovery of New Orleans continues, SUNO has a need to provide educational facilities and functions while reducing the risk of flooding and future damage.

## **3.0 ALTERNATIVES CONSIDERED**

### **3.1 No Action**

Implementation of the No Action Alternative would entail no public assistance funding for the damaged facilities. The facilities would be left in unsafe conditions and would continue to deteriorate. SUNO would not be able to provide adequate higher education to its student body.

### **3.2 Alternative Two (2): Replace the Multi-Purpose Classroom Building, Brown Hall, New Classroom Building, Clark Hall, and the Central Plant in Their Pre-Disaster Footprints**

Under this Alternative, the applicant would demolish and replace in-kind the Multi-Purpose Classroom building, Brown Hall, New Classroom building, Clark Hall, and the Central Plant in the pre-disaster footprints, square footage, height, and capacities (Figure 3). These buildings were eligible for replacement by the FEMA PA program.

Brown Hall is a three (3) story, 35,400 square foot (sf) concrete structure, built in 1961. The first floor is approximately 15,200 sf including a 4,500 sf auditorium. The second and third floors are approximately 10,100 sf each. During the disaster, water surged into Brown Hall to a height of about 5', settling to a 3'6" depth from which it gradually subsided over a period of weeks.

The Multi-Purpose Classroom building is a two (2) story, 64,625 sf concrete, slab on grade, structure built in 1993. The first floor is approximately 49,500 sf, and the second floor is approximately 15,200 sf. The building contains a large lobby, an auditorium with approximately 1000 seats, music rooms, offices, and meeting rooms. During the disaster, water surged into the building to a height of about 4'6", and gradually subsided over a period of weeks.

The New Science Classroom building is a three (3) story, 54,000 sf concrete building, built in 1972. Each floor is approximately 18,000 sf. During the disaster, water surged into the New Science Classroom building to a height of about 7', settling to a 5'6" depth from which it gradually subsided over a period of weeks.

The Clark Hall education building is a three (3) story, slab on grade, 58,000 sf steel building, built in 1974. The first floor is approximately 20,000 sf, second floor is 18,000 sf, and the third floor is approximately 20,000 sf. There is a 2,000 sf, two (2) floor atrium lobby space with ceramic tile flooring. During the disaster, water surged into the building to a height of about 8',

settling back to a 6' depth from which it gradually subsided over a period of weeks. This building has been demolished by the applicant. Demolition work was approved by the FEMA-Environmental and Historic Preservation department (EHP) as part of the replacement in-kind project.

The Central Plant was built in 1963. It is a one (1) story central heating plant building that has a concrete foundation, concrete masonry unit walls, a brick veneer facade, a steel bar-joint roof truss system, and a built up roof covering. With a gross floor area of 8,052 sf, the mechanical facility lost all of its centralized heating and chiller mechanical functions due to damages as a result of the event.

This alternative meets the purpose and need and will be carried forward for analysis.

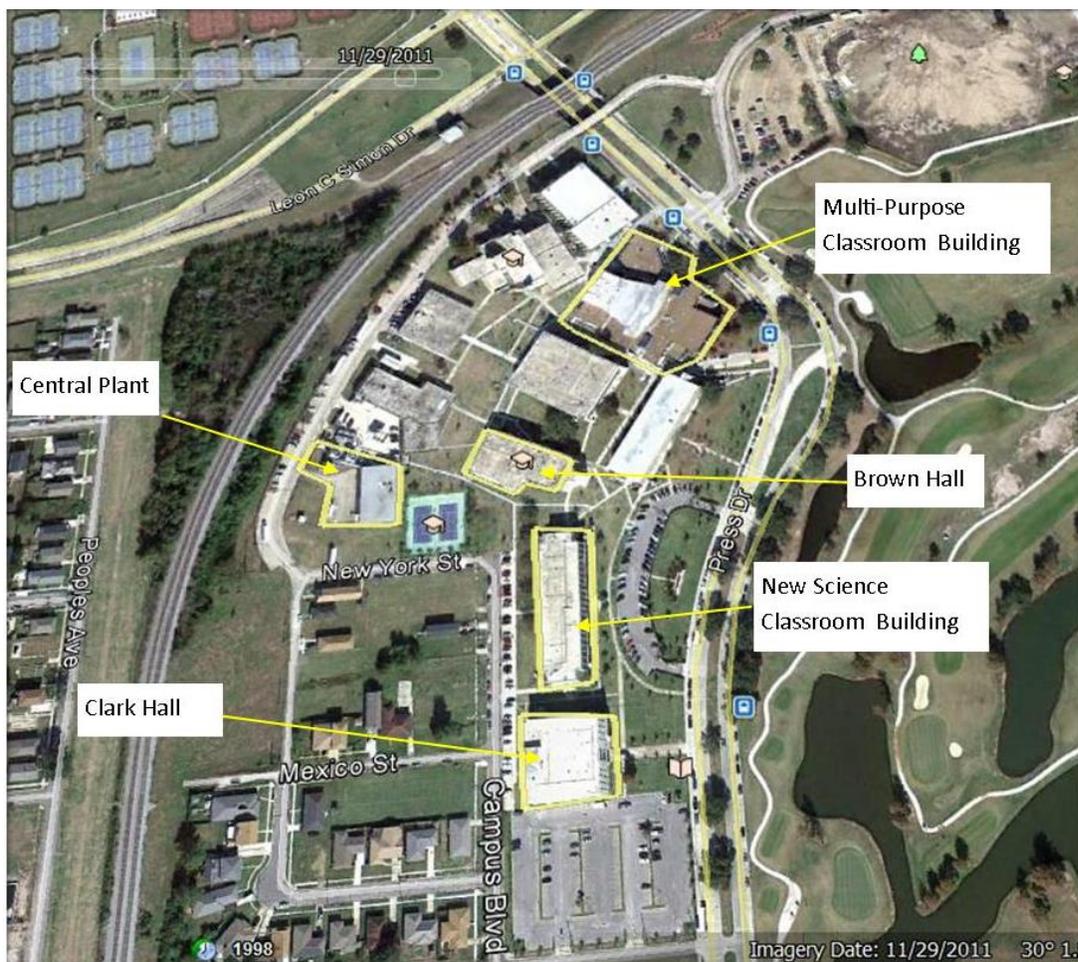


Figure 3: Current location of existing, damaged buildings

### **3.3 Alternative Three (3) (Preferred): Demolish Multi-Purpose Classroom Building, Brown Hall, New Classroom Building, and the Central Plant and Construct Five (5) New Buildings**

In 2011, the applicant revised SUNO's Master Plan to take into account damaged buildings and the opportunity to expand the campus in the future years to better serve the student population. According to this Master Plan, the applicant proposes to demolish the Multi-Purpose Classroom building, Brown Hall, New Classroom building, and the Central Plant. The applicant would then construct five (5) new state of the art buildings in a configuration which would encourage growth while providing a higher quality of education.

Implementing this alternative would entail constructing two (2) new buildings on the Lake Campus: School of Social Work building and College of Education & Human Development building. The School of Social Work would be located on the northwest corner of the Park Campus (30.031416, -90.045786) and the College of Education & Human Development would be constructed on the southeast corner (30.030287, -90.043966) (Figure 4). At this time, the applicant is unsure about the layout of the new buildings; however, all construction would take place within the existing lots as outlined in Figure 4. Table 1 demonstrates the planned size and GPS locations of the proposed buildings described in this alternative.

In addition, the applicant proposes to construct the following buildings on the Park Campus: a new Central Plant, adjacent to the existing (see Figure 5); an Arts & Humanities with a Social Sciences building within the footprint of the old Multi-Purpose Classroom building; and a new Natural Sciences building within the existing lot as outlined in Figure 5. Due to the decreased number of buildings on the Park Campus, the capacity of the Central Plant would decrease from 2100 tons to 1600 tons. Upon completion of the new Central Plant, the existing Central Plant would be demolished.

Additional proposed work on the campus includes new chiller lines to the newly constructed buildings on the Park Campus only. Each building on the Lake Campus would be served by self-contained heating, ventilation, and air conditioning (HVAC) systems; repair/replacement of damaged utilities throughout the campus; and the construction of sidewalks/landscaping (Appendix B). New buildings on the Park Campus would have provisions for subsurface drains and sewer lines that tie into the existing system. As SUNO continues to develop the Lake Campus, new storm drains and new lines would tie into the underground Orleans Sewer & Water Board System main line that runs down Leon C. Simon Blvd.

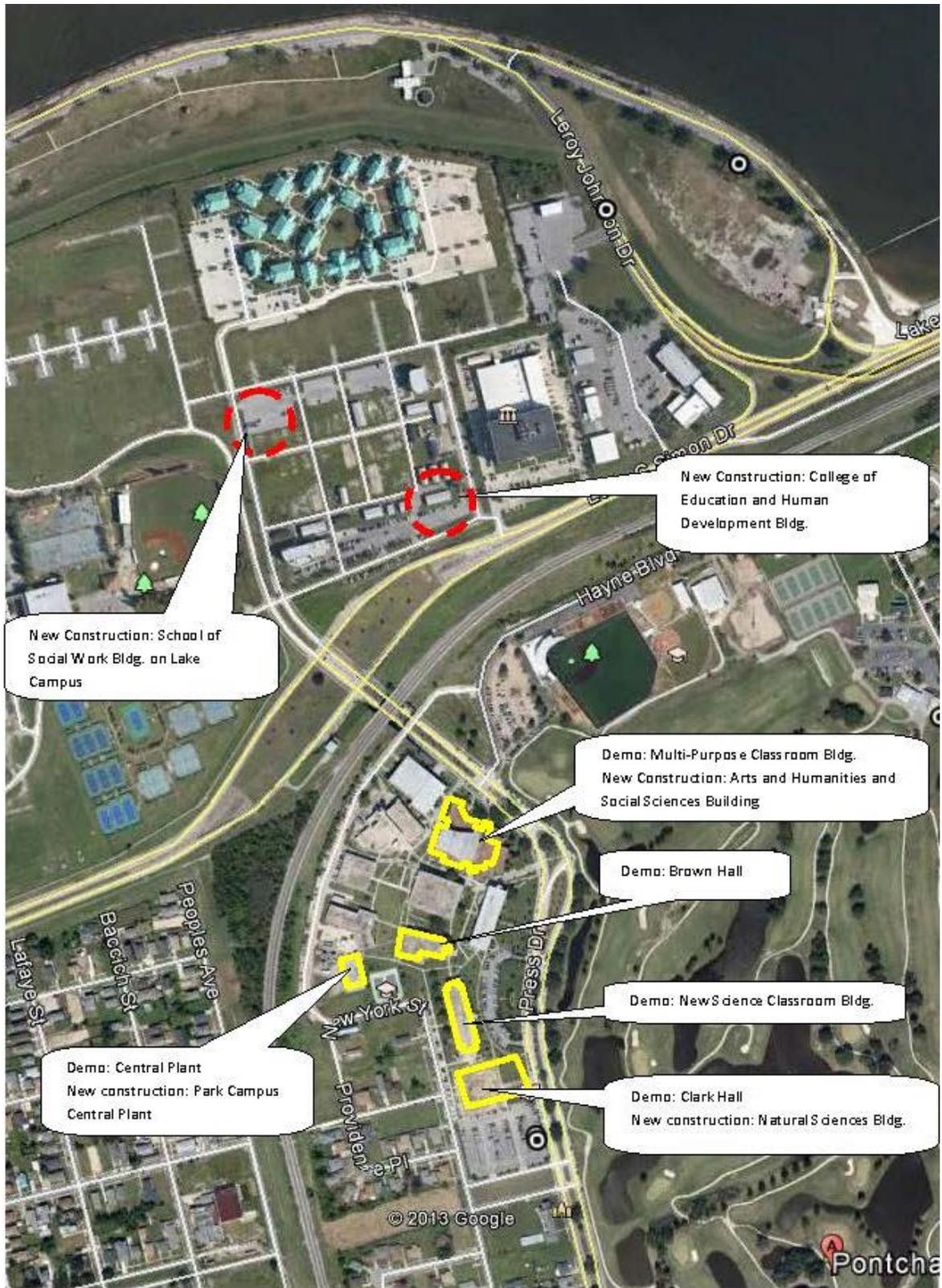
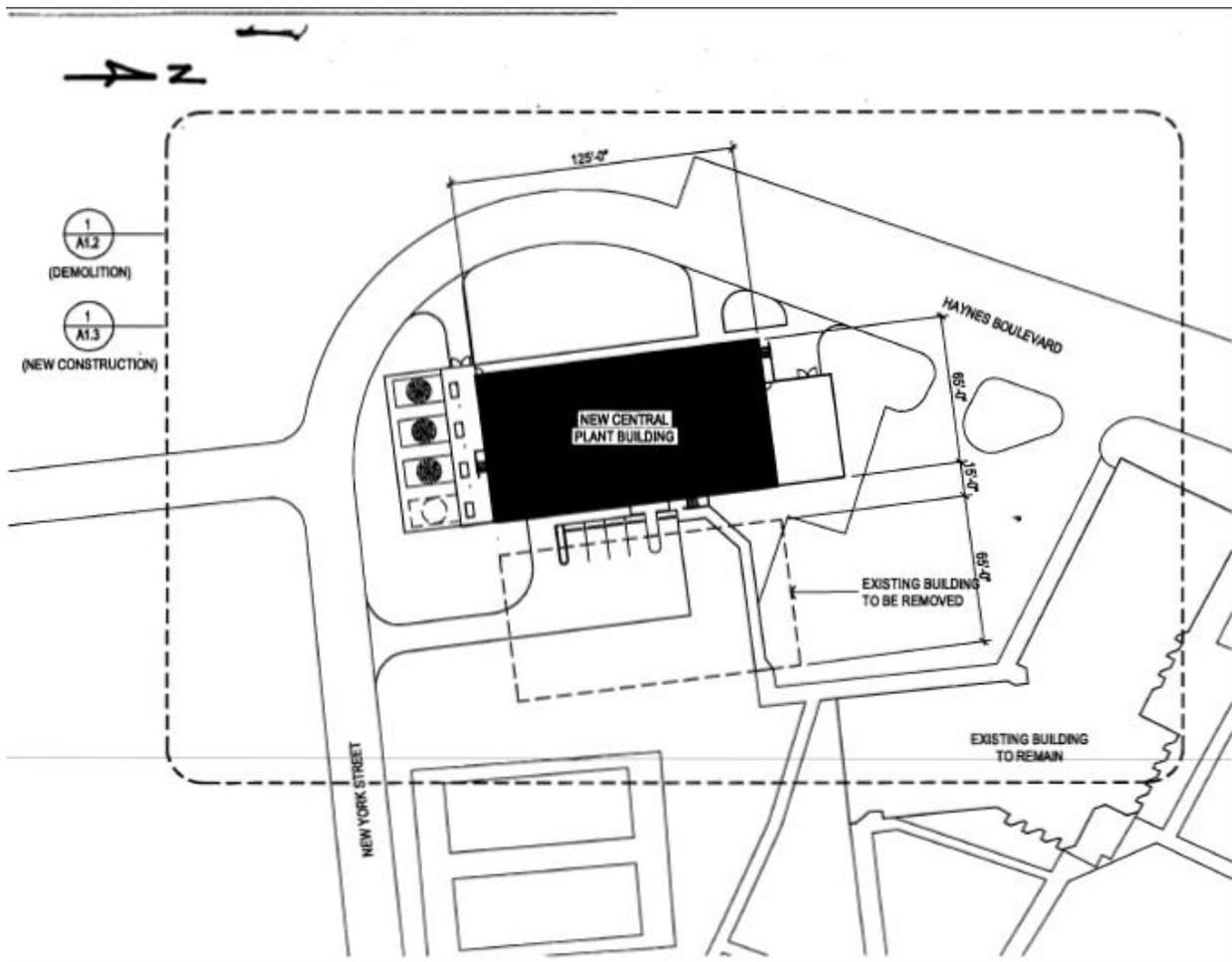


Figure 4: Proposed work at the SUNO campuses

**Table 1: Approximate Size and Location of Proposed Buildings**

New Building	# of Stories	SF (approx.)	Latitude (approx.)	Longitude (approx.)
Multipurpose Building	3	75,464	30.02641	-90.00443
Central Plant	1	7,840	30.02568	-90.04585
Science Building	3	72,833	30.02405	-90.04446
Education Building	3	70,038	30.03060	-90.04390
Social Work Building	2	39,123	30.03150	-90.04580



**Figure 5: Site plan for the proposed Central Plant building**

## **4.0 Affected Environment and Impacts**

### **4.1 Impact Summary**

The following matrix summarizes the results of the environmental review process (Tables 2 and 3). Potential environmental impacts that were found to be negligible are not evaluated further. Resource areas that have the potential for impacts of minor, moderate, or major intensity are further developed in the subsequent sections. Definitions of impact intensity are described below:

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

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

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

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

**Table 2 - Affected Environment and Environmental Consequences Matrix: Alternative Two (2) - Replace the Multi-Purpose Classroom Building, Brown Hall, New Classroom Building, Clark Hall, and the Central Plant in the Pre-Disaster Footprints**

Resource Area	Impact Negligible	Impact Minor	Impact Moderate	Impact Major	Impact Summary	Agency Coordination / Permits	Mitigation
Geology and Soils	X				The Farmland Protection Policy Act (FPPA: Public Law 97-98, §§ 1539-1549; 7 U.S.C. 4201, <i>et seq.</i> ) 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. Potential for short-term localized increase in soil erosion during construction. Per review of the Natural Resources Conservation Services (NRCS) Web Soil Survey, the soil located on the proposed project area (Allemands Muck, drained [Ae], Aquents, dredged [An], and Aquents, dredged, frequently flooded [AT]) is not classified as a prime farmland soil; Farmland Protection Policy Act is precluded.	Louisiana Department of Environmental Quality (LDEQ) solicitation of views (SOV) response on 9/5/13. (See Appendix C)	Implement construction Best Management Practices (BMPs); install silt fences/straw bales to reduce downslope sedimentation. Area soils must be covered and/or wetted during construction. If fill is stored on site as part of unit installation or removal, the contractor is required to appropriately cover it. Construction contractor is required to obtain applicable Louisiana Pollutant Discharge Elimination System (LPDES) permit, and implement stormwater pollution prevention plan. See also Section 6.0.
Hydrology and Floodplains (Executive Order 11988)		X			Executive Order (EO) 11988 (Floodplain Management) requires Federal agencies to avoid direct or indirect support or development within the 100-year floodplain whenever there is a practicable alternative. FEMA's regulations for complying with EO 11988 are found at 44 CFR Part 9. Preliminary Digital Flood Insurance Map (DFIRM) Panel 22071C0114F, dated 11/9/2012, places most of this project in Zone "Shaded X," levee protected from the base flood. Preliminary DFIRM Panel 22071C0118F, dated 11/9/2012, places the southern edge of the project in Flood Zone "AE," Base Flood Elevation (BFE) -5 feet NAVD88. Advisory Base Flood Elevation (ABFE) Maps LA-EE32 and LA-FF32, dated 6/5/2006, place this project in an ABFE - 1.0 feet NGVD 29 or 3 feet highest existing adjacent grade (HEAG). *NGVD 29 = National Geodetic Vertical Datum of 1929. See Section 4.2	Preliminary DFIRM Panel 22071C0114F, dated 11/9/2012  Preliminary DFIRM Panel 22071C0118F, dated 11/9/2012  ABFE Maps LA-EE32 and LA-FF32, dated 6/5/2006	The applicant is required to coordinate with the local floodplain administrator regarding floodplain permit(s) prior to the start of any activities. All coordination pertaining to these activities and applicant compliance with any conditions should be documented and copies forwarded to the state and FEMA for inclusion in the permanent project files. As per 44 CFR 9.11 (d) (9), mitigation or minimization standards must be applied, where possible. The replacement of building contents, materials and equipment should be, where possible, wet or dry-proofed, elevated, or relocated to or above the Preliminary DFIRM BFE or local floodplain ordinances, whichever is more stringent. See also Section 4.2 and Section 6.0.

Resource Area	Impact Negligible	Impact Minor	Impact Moderate	Impact Major	Impact Summary	Agency Coordination / Permits	Mitigation
Wetlands (Executive Order 11990)	X				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. U.S. Fish and Wildlife Service (USFWS)-mapped wetlands are not present in the proposed project area. Per correspondence from U.S. Environmental Protection Agency (USEPA) there are no wetlands in the area.	U.S. Army Corps of Engineers (USACE) Solicitation response letter dated 6/10/14 USEPA Solicitation response letter dated 5/15/14. (See Appendix C)	Any changes or modifications to the proposed project will require a revised determination. Off-site locations of activities such as borrow, disposals, haul- and detour roads, and work mobilization site developments may be subject to USACE regulatory requirements.

Resource Area	Impact Negligible	Impact Minor	Impact Moderate	Impact Major	Impact Summary	Agency Coordination / Permits	Mitigation
Surface Water and Water Quality	X				<p>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 §§ 401 and 404 of the Clean Water Act (CWA). Section 402 of the CWA, entitled National Pollutant Discharge Elimination System (NPDES), authorizes and sets forth standards for state administered permitting programs regulating the discharge of pollutants into navigable waters within the state's jurisdiction. The USACE also regulates the building of structures in waters of the U.S. pursuant to §§ 9 and 10 of the Rivers and Harbors Act (RHA).</p> <p>Potential for short-term localized increase in sedimentation during construction.</p>	<p>LDEQ email dated 6/9/14.  USACE letter dated 6/10/14  (See Appendix D)</p>	<p>The project results in a discharge to waters of the State; submittal of a Louisiana Pollutant Discharge Elimination System LPDES application is necessary.</p> <p>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.</p> <p>All precautions must be observed to control nonpoint source pollution from construction activities. LDEQ has stormwater general permits for construction areas equal to or greater than one (1) acre. The applicant must contact the LDEQ Water Permits Division at (225) 219-9371 to determine if the proposed project requires a permit.</p> <p>If the project will include a sanitary wastewater treatment facility, a Sewage Sludge and Biosolids Use or Disposal Permit application or Notice of Intent must be submitted no later than January 1, 2015. Additional information may be obtained on the LDEQ website at <a href="http://www.deq.louisiana.gov/portal/tabid/2296/Default.aspx">http://www.deq.louisiana.gov/portal/tabid/2296/Default.aspx</a> or by contacting the LDEQ Water Permits Division at (225) 219- 9371.</p> <p>Please be advised that water softeners generate wastewaters that may require special limitations depending on local water quality considerations. Therefore if the applicant's water system improvements include water softeners, the applicant is to contact the LDEQ Water Permits Department to determine if special water quality-based limitations will be necessary.</p> <p>Any renovation or remodeling must comply with Louisiana Administrative Code (LAC) 33:III.Chapter 28, Lead-Based Paint Activities; LAC 33:III.Chapter 27, Asbestos-Containing Materials in Schools and State Buildings (includes all training and accreditation); and LAC 33:III.5151, Emission Standard for Asbestos for any renovations or demolitions.</p> <p>If any solid or hazardous wastes, or soils and/or groundwater contaminated with hazardous constituents are encountered during the project, notification to LDEQ's Single-Point-of-Contact (SPOC) at (225) 219-3640 is required. Additionally, precautions must be taken to protect workers from these hazardous constituents</p> <p>See also Section 6.0.</p>

Resource Area	Impact Negligible	Impact Minor	Impact Moderate	Impact Major	Impact Summary	Agency Coordination / Permits	Mitigation
Groundwater	X				The Safe Drinking Water Act (SDWA) was originally passed by Congress in 1974 to protect public health by regulating the nation's public drinking water supply. Orleans Parish does not overlay a Sole Source Aquifer. Project as proposed is not expected to affect any groundwater.	USEPA letter dated 5/15/14. LDEQ email dated 6/9/14. (See Appendix C)	The contractor must observe all precautions to protect the groundwater of the region. See also Section 6.0.
Wild and Scenic River	X				The Wild and Scenic Rivers Act (Act), (P. L. 90-543 as amended: 16 U.S.C. 1271-1287) established a method for providing federal protection for certain free-flowing rivers, preserving them and their immediate environments for the use and enjoyment of present and future generations. There are no Wild and Scenic Rivers in the vicinity.	Louisiana Department of Wildlife and Fisheries (LDWF) letter dated 6/18/14 (See Appendix C)	
Coastal Resources	X				The Coastal Zone Management Act of 1972 (CZMA, or the Act) encourages the management of coastal zone areas and provides grants to be used in maintaining coastal zone areas. 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 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>i.e.</i> , Otherwise Protected Areas [OPAs]) by prohibiting direct or indirect Federal funding of projects that support development in these areas. According to the Louisiana Department of Natural Resources (LDNR), the project site is located within the Louisiana Coastal Zone and would require a Coastal Use Permit (CUP). The project is not located within the Coastal Barrier Resource System (CBRS).	LDNR response letter dated 5/23/14 (See Appendix C)  Preliminary DFIRM 22071C0114F, dated 11/9/2012 and 22071C0118F, dated 11/9/2012 (for CBRS)	The applicant is responsible for coordinating with and obtaining any required permit(s) from the LDNR Coastal Management Division prior to initiating work. The applicant shall comply with all conditions of the required permit. All coordination pertaining to these activities and applicant compliance with any conditions should be documented and copies forwarded to the state and FEMA for inclusion in the permanent project files. See also Section 6.0.

Resource Area	Impact Negligible	Impact Minor	Impact Moderate	Impact Major	Impact Summary	Agency Coordination / Permits	Mitigation
Air Quality	X				The Clean Air Act (CAA) requires the State of Louisiana to adopt ambient air quality standards to protect the public from potentially harmful amounts of pollutants. The LDEQ has designated areas meeting the state's ambient air quality standards by their monitoring and modeling program efforts. During construction, there is potential for a short-term localized increase in vehicle emissions and dust particles. Orleans Parish is classified as attainment under the NAAS and has no general conformity determination obligations.	LDEQ email dated 6/9/14 (See Appendix C)	Vehicle operation times would be kept to a minimum. Area soils must be covered and/or wetted during construction to minimize dust. Any renovation or remodeling must comply with LAC 33:III.Chapter 28, Lead-Based Paint Activities; LAC 33:III.Chapter 27, Asbestos-Containing Materials in Schools and State Buildings (includes all training and accreditation); and LAC 33:III.5151, Emission Standard for Asbestos for any renovations or demolitions. See also Section 6.0.
Vegetation and Wildlife	X				The Fish and Wildlife Coordination Act (FWCA) provides the basic authority for the USFWS involvement in evaluating impacts to fish and wildlife from proposed water resource development projects. It requires that fish and wildlife resources receive equal consideration to other project features. It also requires Federal agencies that construct, license or permit water resource development projects to first consult with the Service (and the National Marine Fisheries Service in some instances) and State fish and wildlife agency regarding the impacts on fish and wildlife resources and measures to mitigate these impacts. The site is developed in an urban area with little native vegetation present. In addition the project does not involve the diversion, modification, or control of a waterway.	LDWF determination of no effect, dated 6/18/14. USFWS determination of no effect on Federal trust resources, dated 5/13/14 (See Appendix C)	
Threatened and Endangered Species (Endangered Species Act Section 7)	X				The Endangered Species Act (ESA) of 1973 prohibits the taking of listed, threatened, and endangered species unless specifically authorized by permit from the USFWS or the National Marine Fisheries Service. No rare, threatened, or endangered species are present on the site. No impacts to rare, threatened, or endangered species or critical habitats are anticipated for the proposed project. No state or Federal parks, wildlife refuges, or wildlife management areas are known at the site.	USFWS determination of no effect on Federal trust resources, dated 5/13/14 (See Appendix C) LDWF letter dated 6/18/14. (See Appendix C)	

Resource Area	Impact Negligible	Impact Minor	Impact Moderate	Impact Major	Impact Summary	Agency Coordination / Permits	Mitigation
Cultural Resources (National Historic Preservation Act Section 106)	X				FEMA has determined that there are two (2) historic properties as defined in 36 CFR 800.16(1) within the Area of Potential Effect (APE), the National Register of Historic Places (NRHP)-eligible SUNO Administration Building and the NRHP-eligible Pontchartrain Park Historic District. The Undertaking would not directly or indirectly affect the characteristics which contribute to the eligibility of either resource; it would not make changes to any elements within their eligible historic boundaries, would not introduce visual elements or materials that are not in keeping with the character of the properties' settings, and the new structures would be constructed in an areas which have already been affected by non-contributing structures. FEMA has determined that there would be "No Adverse Effect" to historic properties. SHPO concurrence was received dated 6/20/2014. Consultation with affected tribes, (Alabama-Coushatta Tribe of Texas [ACTT], Choctaw Nation of Oklahoma [CNO], Coushatta Tribe of Louisiana[CT], Jena Band of Choctaw Indians [JBCI], Mississippi Band of Choctaw Indians [MBCI], Muscogee Creek Nation [MCN], Quapaw Tribe of Oklahoma [QTO], Seminole Nation of Oklahoma [SNO], Tunica-Biloxi Tribe of Louisiana [TBTL]) was conducted per FEMA's Programmatic Agreement dated August 17, 2009 and amended on July 22, 2011 (PA). The Choctaw Nation of Oklahoma and the Quapaw Tribe of Oklahoma submitted written concurrence with the determination. The remaining Tribes did not object within the regulatory timeframes; therefore, in accordance with Stipulation VIII.E(1) of the PA and 36 CFR part 800.5(c)1, FEMA may proceed with funding the undertaking assuming concurrence. The applicant must comply with the National Historic Preservation Act (NHPA) conditions set forth in this EA.	FEMA submitted a finding of No Adverse Effect to Historic Properties to SHPO, ACTT, CNO, CT, JBCI, MBCI, MCN, QTO, SNO, and TBTL. SHPO concurrence with FEMA's determination was received dated June 20, 2014. The QTO submitted concurrence dated June 11, 2014. The CNO submitted concurrence dated June 13, 2014. The remaining Tribes did not object within the regulatory timeframes (See Appendix C)	Louisiana Unmarked Human Burial Sites Preservation Act: If human bone or unmarked grave(s) are present with the project area, compliance with the Louisiana Unmarked Human Burial Sites Preservation Act (R.S. 8:671 et seq.) is required. The applicant shall notify the law enforcement agency of the jurisdiction where the remains are located within twenty-four (24) hours of the discovery. The applicant shall also notify FEMA and the Louisiana Division of Archaeology at 225-342-8170 within seventy-two (72) hours of the discovery.  Inadvertent Discovery Clause: If during the course of work, archaeological artifacts (prehistoric or historic) are discovered, the applicant shall stop work in the vicinity of the discovery and take all reasonable measures to avoid or minimize harm to the finds. The applicant shall inform their PA contacts at FEMA, who will in turn contact FEMA Historic Preservation staff. The applicant will not proceed with work until FEMA Historic Preservation completes consultation with the SHPO. See also Section 6.0.

Resource Area	Impact Negligible	Impact Minor	Impact Moderate	Impact Major	Impact Summary	Agency Coordination / Permits	Mitigation
Environmental Justice (Executive Order 12898)/Socioeconomics	X				EO 12898, entitled “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations,” was signed on February 11, 1994. The EO 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. According to the 2010 U.S. Census Demographic Profile of 70126, New Orleans, LA: the total population is 23,958 with 91.3% Black, 5.6% White, and 2.5% Hispanic,. The median household income is \$27,984 and 34% of the population is below poverty level. SUNO is a public education institute and provides essential higher education to the surrounding community as well as others. The proposed project would enhance the learning environment and bring more students to the campus, thus enhancing the economic development of the area.	U.S. Census Bureau, American Fact Finder, Data for New Orleans, Louisiana accessed August 2014	

Resource Area	Impact Negligible	Impact Minor	Impact Moderate	Impact Major	Impact Summary	Agency Coordination / Permits	Mitigation
Resource Recovery and Conservation Act (RCRA)	X				<p>The objectives of the RCRA are to protect human health and the environment from the potential hazards of waste disposal, to conserve energy and natural resources, to reduce the amount of waste generated, and to ensure that wastes are managed in an environmentally sound manner. RCRA regulates the management of solid waste (e.g., garbage), hazardous waste, and underground storage tanks holding petroleum products or certain chemicals.</p> <p>Project involves demolition of old and construction of new building at the proposed sites. All debris would be disposed of at a permitted landfill.</p>	LDEQ email dated 6/9/14 (See Appendix C)	<p>If any solid or hazardous wastes, or soils and/or groundwater contaminated with hazardous constituents are encountered during the project, notification to LDEQ's SPOC at (225) 219-3640 is required. Additionally, precautions should be taken to protect workers from these hazardous constituents.</p> <p>Regardless of the asbestos content, the applicant is responsible for ensuring that renovation or demolition activities are coordinated with the LDEQ. 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 at the project site, the applicant is also responsible for ensuring proper disposal in accordance with the previously referenced administrative orders. ACM/PACM must be handled in accordance with local, state and federal regulations and disposed of at approved facilities that accept ACM. Demolition activity notification must be sent to the LDEQ before work begins.</p> <p>The applicant is responsible for complying with the Toxic Substances Control Act (TSCA) Section 402(c)(3) requirements as well as to the satisfaction of the governing local, state, and federal agencies to ensure that project activities are managed, administered, and/or handled by certified/accredited technicians, contractors, and providers. The applicant is responsible complying with all local, state, and federal laws and ensuring that project activities are coordinated with the LDEQ for abatement activities</p> <p>The applicant is responsible for complying with the TSCA requirements at 40 CFR 761 for electrical equipment (including transformers) containing polychlorinated biphenyls (PCBS). These provisions address the storage and disposal of equipment containing PCBS, as well as the remediation of any PCB spills. All required agency coordination pertaining to these activities should be documented and copies forwarded to the state and FEMA as part of the permanent project files</p> <p>See also section 6.0</p>

Resource Area	Impact Negligible	Impact Minor	Impact Moderate	Impact Major	Impact Summary	Agency Coordination / Permits	Mitigation
Noise	X				<p>Noise is commonly defined as unwanted or unwelcome sound, and most commonly measured in decibels (dB) on the A-weighted scale, which is the scale most similar to the range of sounds that the human ear can hear. Sound is federally regulated by the Noise Control Act of 1972, which charges the EPA with preparing guidelines for acceptable ambient noise levels. EPA guidelines, and those of many other federal agencies, state that outdoor sound levels in excess of 55 dB day-night average sound level (DNL) are “normally unacceptable” for noise-sensitive land uses including residences, schools, or hospitals.</p> <p>During the construction period there would be a short-term increase in noise levels.</p>	City of New Orleans Noise Ordinance 66-136	<p>City of New Orleans Noise Ordinance limits noise levels by receiving land use in residential, public, commercial, and industrial areas to varying decibel levels during the “daytime” hours of 7 AM to 10 PM. Construction activities should be limited to this schedule on weekdays.</p> <p>Mitigation and abatement measures will be required to reduce the noise levels to a range that would be considered acceptable.</p> <p>See also Section 6.0.</p>
Public Safety and Access	X				<p>Congress passed the Occupational and Safety Health Act to ensure worker and workplace safety. The goal was to make sure employers provide their workers a place of employment free from recognized hazards to safety and health, such as exposure to toxic chemicals, excessive noise levels, mechanical dangers, heat or cold stress, or unsanitary conditions.</p> <p>During construction heavy equipment would be located in a populated area. Impacts to public safety and security would be minimized with mitigation measures, including following Occupational Safety and Health Administration (OSHA) regulations.</p>		<p>The contractor must place fencing around the work area perimeters to protect nearby residents from vehicular traffic. To minimize worker and public health and safety risks from project construction and closure, all construction and closure work must be done using qualified personnel trained in the proper use of construction equipment, including all appropriate safety precautions. Additionally, all activities must be conducted in a safe manner in accordance with the standards specified in OSHA regulations and the USACE safety manual.</p> <p>The contractor must post appropriate signage and fencing to minimize potential adverse public safety concerns.</p> <p>See also Section 6.0.</p>
Traffic and Transportation	X				<p>Traffic volumes near the respective work access areas would increase temporarily during work activities.</p>		<p>Appropriate signage and barriers should be in place prior to construction activities in order to alert pedestrians and motorists of project activities and traffic pattern changes. The contractor should implement traffic control measures, as necessary.</p> <p>See also Section 6.0.</p>

Resource Area	Impact Negligible	Impact Minor	Impact Moderate	Impact Major	Impact Summary	Agency Coordination / Permits	Mitigation
Hazardous Materials and Toxic Wastes	X				<p>The management of hazardous materials is regulated under various federal and state environmental and transportation laws and regulations, including 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.</p> <p>Per NEPAssist database search, there are no Louisiana State Brownfield (LSB) sites located within 0.5 miles of the site. The database also revealed three (3) hazardous waste (RCRA) facilities within 0.5 miles of the site. No Superfund or Toxic Release Inventory sites were listed.</p> <p>LDEQ was contacted and it was determined no impacts related to hazardous materials and wastes are anticipated.</p>	LDEQ email dated 6/9/14 (See Appendix C) NEPAssist-USEPA (See Appendix C)	If hazardous materials are unexpectedly encountered in the project area during the proposed construction operations, appropriate measures for the proper assessment, remediation, management and disposal of the contamination would be initiated in accordance with applicable Federal, State, and local regulations. The contractor would be required to take appropriate measures to prevent, minimize, and control the spill of hazardous materials in the construction area and any offsite runoff. See also Section 6.0.

**Table 3 - Affected Environment and Environmental Consequences Matrix: Alternative Three (3) (Preferred): Demolish Multi-Purpose Classroom Building, Brown Hall, New Classroom Building, and the Central Plant and Construct Five (5) New Buildings**

Resource Area	Impact Negligible	Impact Minor	Impact Moderate	Impact Major	Impact Summary	Agency Coordination / Permits	Mitigation
Geology and Soils	X				The FPPA (FPPA: P.L. 97-98, §§ 1539-1549; 7 U.S.C. 4201, <i>et seq.</i> ) 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. Potential for short-term localized increase in soil erosion during construction. Potential for short-term localized increase in soil erosion during construction. Per review of the NRCS Web Soil Survey, the soil located on the proposed project area (Allemands Muck, drained [Ae], Aquents, dredged [An], and Aquents, dredged, frequently flooded [AT]) is not classified as a prime farmland soil; Farmland Protection Policy Act is precluded.	LDEQ SOV response on 9/5/13. (See Appendix C)	Implement construction BMPs; install silt fences/straw bales to reduce downslope sedimentation. Area soils should be covered and/or wetted during construction. If fill is stored on site as part of unit installation or removal, the contractor is required to appropriately cover it. Construction contractor is required to obtain applicable LPDES permit, and implement stormwater pollution prevention plan. See also Section 6.0.
Hydrology and Floodplains (Executive Order 11988)		X			EO11988 requires Federal agencies to avoid direct or indirect support or development within the 100-year floodplain whenever there is a practicable alternative. FEMA's regulations for complying with EO 11988 are found at 44 CFR Part 9. Preliminary DFIRM Map Panel 22071C0114F, dated 11/9/2012, places most of this project in Zone "Shaded X," levee protected from the base flood. Preliminary DFIRM Panel 22071C0118F, dated 11/9/2012, places the southern edge of the project in Flood Zone "AE," BFE -5 feet NAVD88. ABFE Maps LA-EE32 and LA-FF32, dated 6/5/2006, place this project in an ABFE -1.0 feet NGVD 29 or 3 feet HEAG. *NGVD 29 = National Geodetic Vertical Datum of 1929. See Section 4.2	Preliminary DFIRM Panel 22071C0114F, dated 11/9/2012  Preliminary DFIRM Panel 22071C0118F, dated 11/9/2012  ABFE Maps LA-EE32 and LA-FF32, dated 6/5/2006	The applicant is required to coordinate with the local floodplain administrator regarding floodplain permit(s) prior to the start of any activities. All coordination pertaining to these activities and applicant compliance with any conditions should be documented and copies forwarded to the state and FEMA for inclusion in the permanent project files. As per 44 CFR 9.11 (d) (9), mitigation or minimization standards must be applied, where possible. The replacement of building contents, materials and equipment should be, where possible, wet or dry-proofed, elevated, or relocated to or above the Preliminary DFIRM BFE or local floodplain ordinances, whichever is more stringent. See also Section 4.2 and Section 6.0.

Resource Area	Impact Negligible	Impact Minor	Impact Moderate	Impact Major	Impact Summary	Agency Coordination / Permits	Mitigation
Wetlands (Executive Order 11990)	X				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. USFWS mapped wetlands are not present in the proposed project area. Per correspondence from USEPA there are no wetlands in the area.	USACE Solicitation response letter dated 6/10/14 USEPA Solicitation response letter dated 5/15/14. (See Appendix C)	Any changes or modifications to the proposed project will require a revised determination. Off-site locations of activities such as borrow, disposals, haul- and detour roads, and work mobilization site developments may be subject to USACE regulatory requirements.

Resource Area	Impact Negligible	Impact Minor	Impact Moderate	Impact Major	Impact Summary	Agency Coordination / Permits	Mitigation
Surface Water and Water Quality	X				<p>The USACE regulates the discharge of dredged or fill material into waters of the U.S., including wetlands, pursuant to §§ 401 and 404 of the CWA. Section 402 of the CWA, entitled NPDES, authorizes and sets forth standards for state administered permitting programs regulating the discharge of pollutants into navigable waters within the state's jurisdiction. The USACE also regulates the building of structures in waters of the U.S. pursuant to §§ 9 and 10 of the RHA.</p> <p>Potential for short-term localized increase in sedimentation during construction.</p>	<p>LDEQ email dated 6/9/14. USACE letter dated 6/10/14 (See Appendix D)</p>	<p>The project results in a discharge to waters of the State; submittal of a LPDES application are necessary. 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.</p> <p>All precautions must be observed to control nonpoint source pollution from construction activities. LDEQ has stormwater general permits for construction areas equal to or greater than one acre. The applicant must contact the LDEQ Water Permits Division at (225) 219-9371 to determine if the proposed project requires a permit.</p> <p>If the project will include a sanitary wastewater treatment facility, a Sewage Sludge and Biosolids Use or Disposal Permit application or Notice of Intent must be submitted no later than January 1, 2015. Additional information may be obtained on the LDEQ website at <a href="http://www.deq.louisiana.gov/portal/tabid/2296/Default.aspx">http://www.deq.louisiana.gov/portal/tabid/2296/Default.aspx</a> or by contacting the LDEQ Water Permits Division at (225) 219- 9371.</p> <p>Please be advised that water softeners generate wastewaters that may require special limitations depending on local water quality considerations. Therefore if the applicant's water system improvements include water softeners, the applicant is to contact the LDEQ Water Permits to determine if special water quality-based limitations will be necessary.</p> <p>Any renovation or remodeling must comply with LAC 33:III.Chapter 28, Lead-Based Paint Activities; LAC 33:III.Chapter 27, Asbestos-Containing Materials in Schools and State Buildings (includes all training and accreditation); and LAC 33:III.5151, Emission Standard for Asbestos for any renovations or demolitions.</p> <p>If any solid or hazardous wastes, or soils and/or groundwater contaminated with hazardous constituents are encountered during the project, notification to LDEQ's SPOC at (225) 219-3640 is required. Additionally, precautions must be taken to protect workers from these hazardous constituents See also Section 6.0.</p>
Groundwater	X				<p>The SDWA was originally passed by Congress in 1974 to protect public health by regulating the nation's public drinking water supply.</p> <p>Orleans Parish does not overlay a Sole Source Aquifer. Project as proposed is not expected to affect any groundwater.</p>	<p>USEPA letter dated 5/15/14. LDEQ email dated 6/9/14. (See Appendix C)</p>	<p>The contractor must observe all precautions to protect the groundwater of the region. See also Section 6.0.</p>

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Wild and Scenic Rivers	X				The Wild and Scenic Rivers Act (Act), (P.L. 90-543 as amended: 16 U.S.C. 1271-1287) established a method for providing federal protection for certain free-flowing rivers, preserving them and their immediate environments for the use and enjoyment of present and future generations. There are no Wild and Scenic Rivers in the vicinity.	LDWF letter dated 6/18/14. (See Appendix C)	
Coastal Resources	X				The Coastal Zone Management Act of 1972 encourages the management of coastal zone areas and provides grants to be used in maintaining coastal zone areas. 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 USFWS regulates federal funding in CBRs units under the CBRA. This Act protects undeveloped coastal barriers and related areas ( <i>i.e.</i> , OPAs) by prohibiting direct or indirect Federal funding of projects that support development in these areas. According to the LDNR, the project site is located within the Louisiana Coastal Zone and would require a CUP. The project is not located within the CBRS.	LDNR response letter dated 5/23/14 (See Appendix C) Preliminary DFIRM 22071C0114F, dated 11/9/2012 and 22071C0118F, dated 11/9/2012 (for CBRS)	The applicant is responsible for coordinating with and obtaining any required permit(s) from the LDNR Coastal Management Division prior to initiating work. The applicant shall comply with all conditions of the required permit. All coordination pertaining to these activities and applicant compliance with any conditions should be documented and copies forwarded to the state and FEMA for inclusion in the permanent project files. See also Section 6.0.
Air Quality	X				The CAA requires the State of Louisiana to adopt ambient air quality standards to protect the public from potentially harmful amounts of pollutants. The LDEQ has designated areas meeting the state's ambient air quality standards by their monitoring and modeling program efforts. During construction, there is potential for short-term localized increase in vehicle emissions and dust particles. Orleans Parish is classified as attainment with the NAAS and has no general conformity determination obligations.	LDEQ email dated 6/9/14. (See Appendix C)	Vehicle operation times would be kept to a minimum. Area soils should be covered and/or wetted during construction to minimize dust. Any renovation or remodeling must comply with LAC 33:III.Chapter 28, Lead-Based Paint Activities; LAC 33:III.Chapter 27, Asbestos-Containing Materials in Schools and State Buildings (includes all training and accreditation); and LAC 33:III.5151, Emission Standard for Asbestos for any renovations or demolitions. See also Section 6.0.

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Vegetation and Wildlife	X				The FWCA provides the basic authority for the USFWS involvement in evaluating impacts to fish and wildlife from proposed water resource development projects. It requires that fish and wildlife resources receive equal consideration to other project features. It also requires Federal agencies that construct, license or permit water resource development projects to first consult with the Service (and the National Marine Fisheries Service in some instances) and State fish and wildlife agency regarding the impacts on fish and wildlife resources and measures to mitigate these impacts. The site is developed in an urban area with little native vegetation present. In addition the project does not involve the diversion, modification, or control of a waterway.	LDWF determination of no effect, dated 6/18/14. USFWS determination of no effect on Federal trust resources, dated 5/13/14 (See Appendix C)	
Threatened and Endangered Species (Endangered Species Act Section 7)	X				The ESA of 1973 prohibits the taking of listed, threatened, and endangered species unless specifically authorized by permit from the USFWS or the National Marine Fisheries Service. No impacts to rare, threatened, or endangered species or critical habitats are anticipated for the proposed project. No state or Federal parks, wildlife refuges, or wildlife management areas are known at the site.	USFWS determination of no effect on Federal trust resources, dated 5/13/14 (See Appendix C) LDWF letter dated 6/18/14. (See Appendix C)	

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Cultural Resources (National Historic Preservation Act Section 106)	X				FEMA has determined that there are two historic properties as defined in 36 CFR 800. 16(1) within the APE, the NRHP-eligible SUNO Administration Building and the NRHP-eligible Pontchartrain Park Historic District. The Undertaking will not directly or indirectly affect the characteristics which contribute to the eligibility of either resource; it will not make changes to any elements within their eligible historic boundaries, will not introduce visual elements or materials that are not in keeping with the character of the properties' settings, and the new structures will be constructed in an areas which have already been affected by non-contributing structures. FEMA has determined that there will be "No Adverse Effect" to historic properties. SHPO concurrence with this determination was received, dated 6/20/2014. Consultation with affected tribes (ACTT, CNO, CT, JBCI, MBCI, MCN, QTO, SNO, and TBTL) was conducted per FEMA's Programmatic Agreement dated August 17, 2009 and amended on July 22, 2011 (PA). The Choctaw Nation of Oklahoma and the Quapaw Tribe of Oklahoma submitted written concurrence with the determination. The remaining Tribes did not object within the regulatory timeframes; therefore, in accordance with Stipulation VIII.E(1) of the PA and 36 CFR part 800.5(c)1, FEMA may proceed with funding the undertaking assuming concurrence. The applicant must comply with the NHPA conditions set forth in this EA.	FEMA submitted a finding of No Adverse Effect to Historic Properties to SHPO, ACTT, CNO, CT, JBCI, MBCI, MCN, QTO, SNO, and TBTL. SHPO concurrence with FEMA's determination was received dated June 20, 2014. The QTO submitted concurrence dated June 11, 2014. The CNO submitted concurrence dated June 13, 2014. The remaining Tribes did not object within the regulatory timeframes. (See Appendix C)	Louisiana Unmarked Human Burial Sites Preservation Act: If human bone or unmarked grave(s) are present with the project area, compliance with the Louisiana Unmarked Human Burial Sites Preservation Act (R.S. 8:671 et seq.) is required. The applicant shall notify the law enforcement agency of the jurisdiction where the remains are located within twenty-four (24) hours of the discovery. The applicant shall also notify FEMA and the Louisiana Division of Archaeology at 225-342-8170 within seventy-two (72) hours of the discovery.  Inadvertent Discovery Clause: If during the course of work, archaeological artifacts (prehistoric or historic) are discovered, the applicant shall stop work in the vicinity of the discovery and take all reasonable measures to avoid or minimize harm to the finds. The applicant shall inform their PA contacts at FEMA, who will in turn contact FEMA Historic Preservation staff. The applicant will not proceed with work until FEMA Historic Preservation completes consultation with the SHPO. See also Section 6.0.

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Environmental Justice (Executive Order 12898)/Socioeconomics	X				EO 12898, entitled “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations,” was signed on February 11, 1994. The EO 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. According to the 2010 U.S. Census Demographic Profile of 70126, New Orleans, LA: the total population is 23,958 with 91.3% Black, 5.6% White, and 2.5% Hispanic. The median household income is \$27,984 and 34% of the population is below poverty level. SUNO is a public educational institute and provides essential higher education to the surrounding community as well as others. The proposed project would enhance the learning environment; bring more students to the campus, thus enhancing the economic development of the area.	U.S. Census Bureau, American Fact Finder, Data for New Orleans, Louisiana accessed August 2014	

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Resource Area	Impact Negligible	Impact Minor	Impact Moderate	Impact Major	Impact Summary	Agency Coordination / Permits	Mitigation
Noise	X				<p>Noise is commonly defined as unwanted or unwelcome sound, and most commonly measured in dB on the A-weighted scale, which is the scale most similar to the range of sounds that the human ear can hear. Sound is federally regulated by the Noise Control Act of 1972, which charges the EPA with preparing guidelines for acceptable ambient noise levels. EPA 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.</p> <p>During the construction period there would be a short-term increase in noise levels.</p>	City of New Orleans Noise Ordinance 66-136	<p>City of New Orleans Noise Ordinance limits noise levels by receiving land use in residential, public, commercial, and industrial areas to varying decibel levels during the “daytime” hours of 7 AM to 10 PM. Construction activities should be limited to this schedule on weekdays</p> <p>Mitigation and abatement measures will be required to reduce the noise levels to a range that would be considered acceptable. Mitigation measures may include: double-paned windows, sound barriers, the use of noise dampening building materials, and insulation of outer walls.</p> <p>See also Section 6.0.</p>
Public Safety and Access	X				<p>Congress passed the Occupational and Safety Health Act to ensure worker and workplace safety. The goal was to make sure employers provide their workers a place of employment free from recognized hazards to safety and health, such as exposure to toxic chemicals, excessive noise levels, mechanical dangers, heat or cold stress, or unsanitary conditions.</p> <p>During construction heavy equipment would be located in a populated area. Impacts to public safety and security would be minimized with mitigation measures, including following OSHA regulations.</p>		<p>The contractor must place fencing around the work area perimeters to protect nearby residents from vehicular traffic. To minimize worker and public health and safety risks from project construction and closure, all construction and closure work must be done using qualified personnel trained in the proper use of construction equipment, including all appropriate safety precautions. Additionally, all activities must be conducted in a safe manner in accordance with the standards specified in OSHA regulations and the USACE safety manual.</p> <p>The contractor must post appropriate signage and fencing to minimize potential adverse public safety concerns.</p> <p>See also Section 6.0.</p>
Traffic and Transportation	X				<p>Traffic volumes near the respective work access areas would increase temporarily during work activities.</p>		<p>Appropriate signage and barriers should be in place prior to construction activities in order to alert pedestrians and motorists of project activities and traffic pattern changes.</p> <p>The contractor should implement traffic control measures, as necessary.</p> <p>See also Section 6.0.</p>

Resource Area	Impact Negligible	Impact Minor	Impact Moderate	Impact Major	Impact Summary	Agency Coordination / Permits	Mitigation
Hazardous Materials and Toxic Wastes	X				<p>The management of hazardous materials is regulated under various federal and state environmental and transportation laws and regulations, including the Comprehensive Environmental Response, CERCLA; the 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.</p> <p>Per NEPAssist database search, there are no LSB sites located within 0.5 miles of the site. The database also revealed three (3) hazardous waste (RCRA) facilities within 0.5 miles of the site. No Superfund or Toxic Release Inventory sites were listed. LDEQ was contacted and it was determined no impacts related to hazardous materials and wastes are anticipated.</p>	LDEQ email dated 6/9/14 (See Appendix C) NEPAssist-EPA (See Appendix C)	If hazardous materials are unexpectedly encountered in the project area during the proposed construction operations, appropriate measures for the proper assessment, remediation, management and disposal of the contamination would be initiated in accordance with applicable Federal, State, and local regulations. The contractor would be required to take appropriate measures to prevent, minimize, and control the spill of hazardous materials in the construction area and offsite runoff. See also Section 6.0.

## **Floodplains**

### **4.3.1 Regulatory Setting**

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

44 CFR Section 9.6 details an 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 Panels LA-EE32 and LA-FF32, the proposed project site is located in an ABFE Elevation -1.0 feet National Geodetic Vertical Datum (NGVD) 29 or 3 Feet above Highest Existing Adjacent Grade (HEAG) Zone and also a 3 Feet above HEAG Zone (Figure 6).

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 Panels 22071C0114F and 22071C0118F, the proposed project site is located in Shaded X Flood Zone (Levee Protected from the Base Flood) and on the southern edge, in the "AE" Flood Zone, Base Flood Elevation -5 feet North American Vertical Datum 1988 (Figure 7).

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.

### **4.3.3 Environmental Impacts**

#### **No Action**

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

#### **Alternative Two (2): Replace the Multi-Purpose Classroom Building, Brown Hall, New Classroom Building, Clark Hall, and the Central Plant in the Pre-disaster Footprints**

This proposed action alternative would replace the damaged facilities in the base floodplain and in the areas levee protected from the base flood. 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 D).

**Alternative Three (3) (Preferred): Demolish Multi-Purpose Classroom Building, Brown Hall, New Classroom Building, and the Central Plant and Construct Five (5) New Buildings**

This action alternative includes new construction of facilities 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 D.)

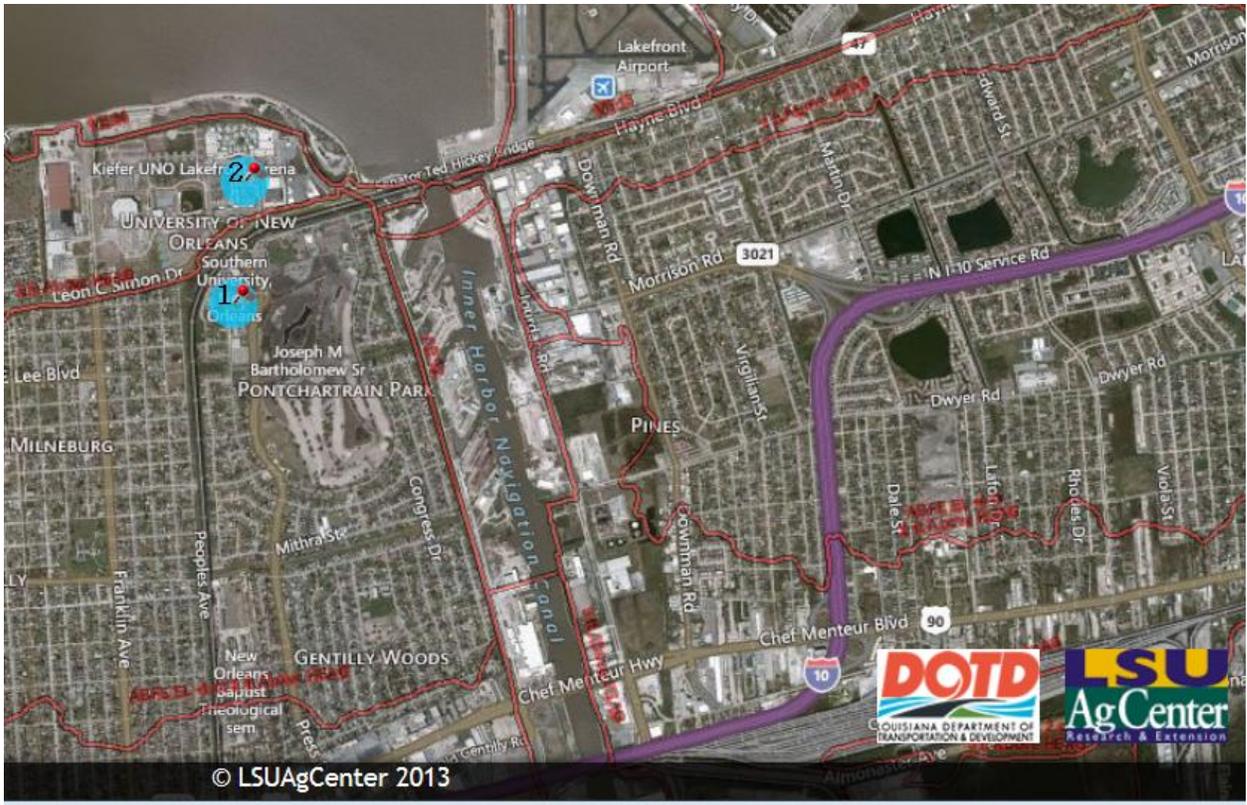
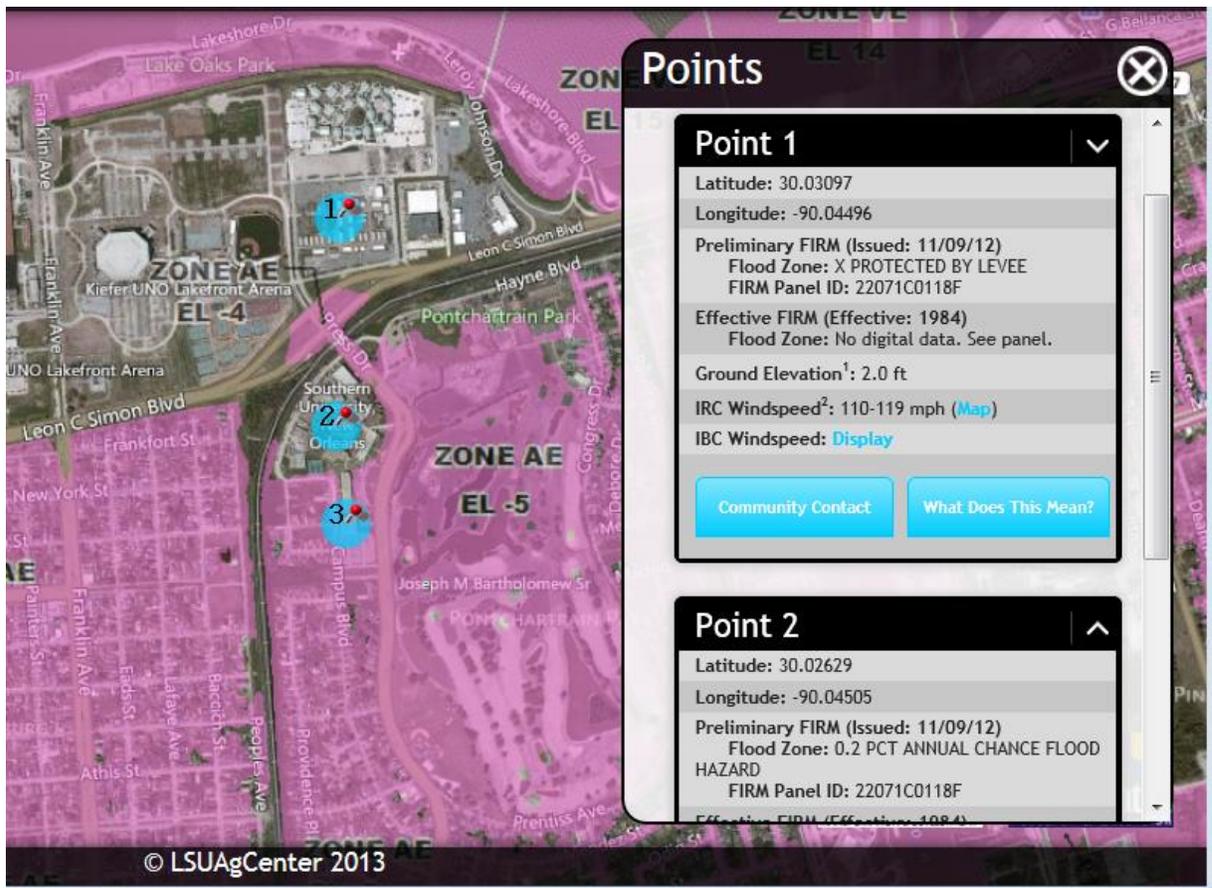


Figure 6: ABFE Map Panels LA-EE32 and LA-FF32, dated 6/5/2006

Note: Point 1 of the project is in an ABFE -1.0 feet NGVD 29 or 3 feet HEAG and point 2 of the project is in an ABFE 3 feet HEAG



**Figure 7: Proposed locations Preliminary DFIRM panel 22071C 0118 F (2012)**  
**Note: Point 1, the Lake Campus, is located in a Shaded X, protected by levee; the Park Campus, Points 2 and 3, is partly located in a Flood Zone “AE” -5’ NAVD 88, BFE Determined and partly in a “Shaded X”, 0.2 % annual chance flood hazard**

## 5.0 CUMULATIVE IMPACTS

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

In its comprehensive guidance on cumulative impacts analysis under NEPA, the CEQ notes that: “[t]he range of actions that must be considered includes not only the project proposal, but all connected and similar actions that could contribute to cumulative effects” (CEQ, 1997). The term “similar actions” may be defined as “reasonably foreseeable or proposed agency actions [with] similarities that provide a basis for

evaluating the environmental consequences together, such as common timing or geography” (40 C.F.R. § 1508.25[a][3]; see also 40 C.F.R. §§ 1508.25[a][2] and [c]).

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

It is normally insufficient when analyzing the contribution of a proposed action to cumulative effects to merely analyze effects within the immediate area of the proposed action (CEQ, 1997, pg. 12). Geographic boundaries should be expanded for cumulative effects analysis, and conducted on the scale of human communities, landscapes, watersheds, or airsheds. Temporal frames should be extended to encompass additional effects on the resources, ecosystems, and human communities of concern. A useful concept in determining appropriate geographic boundaries for a cumulative effects analysis is the project impact zone; that is, the area (and resources within that area) that could be affected by the proposed action. The area appropriate for analysis of cumulative effects will, in most instances, be a larger geographic area occupied by resources outside of the project impact zone.

The proposed project site is located at 6400 Press Drive, New Orleans, within the 70126 zip code geographic area (Figure 8). FEMA has determined that the area within a 0.5 mile radius of the site constitutes an appropriate project impact zone, and the larger geographic area consisting of the 70126 zip code constitutes an appropriate boundary for a cumulative impact analysis of the proposed action and alternatives.



**Figure 8: Boundary map for the 70126 zip code geographic area, showing project location “A”**

In accordance with NEPA, and to the extent reasonable and practicable, this EA considered the combined effects of the Proposed Action Alternative, as well as other actions undertaken by FEMA and other public and private entities that also affect environmental resources the proposed action would affect, and that 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 known 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 past proposed actions, as well as the effects of completed and ongoing actions in order to determine whether the incremental impacts of the current 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, within the 70126 geographic area, approximately 844 FEMA PA program funded, and numerous non-FEMA funded, debris removal, protective measures, and repair projects have occurred, are occurring, or are reasonably foreseen to occur (developed with enough specificity to provide useful information to a decision maker and the interested public) to buildings, roads and bridges, recreational and educational facilities, public utilities, waterways, and more (Figure 9). All FEMA funded actions are subject to various levels of environmental review as a

requirement for the receipt of Federal funding. An applicant's failure to comply with any required environmental permitting or other condition is a serious violation which can result in the loss of Federal assistance, including funding.



**Figure 9: FEMA-funded projects occurring within the 70126 zip code**

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

These infrastructure actions, some of which have already occurred, and many of which will occur concurrent with and/or subsequent to the proposed action, are necessary as a result of the unprecedented devastation caused by the 2005 hurricanes, both Katrina and Rita, in order to restore pre-disaster conditions. In reviewing impacts, socioeconomic resources were identified as having the most potential to experience cumulative effects. Although devastating, the 2005 storms created an opportunity for the applicant to serve

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

## **6.0 Conditions and Mitigation Measures**

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

- In accordance with applicable local, state, and federal regulations, the applicant is responsible for acquiring any necessary permits and/or clearances prior to the commencement of any construction related activities.
- The applicant is required to coordinate with the local floodplain administrator regarding floodplain permit(s) prior to the start of any activities. All coordination pertaining to these activities and applicant compliance with any conditions should be documented and copies forwarded to the state and FEMA for inclusion in the permanent project files. As per 44 CFR 9.11 (d) (9), mitigation or minimization standards must be applied, where possible. The replacement of building contents, materials and equipment should be, where possible, wet or dry-proofed, elevated, or relocated to or above the Preliminary DFIRM BFE or local floodplain ordinances, whichever is more stringent.
- Any changes or modifications to the proposed project will require a revised NEPA determination. Off-site locations of activities such as borrowing, disposals, haul- and detour roads, and work mobilization site developments may be subject to USACE regulatory requirements.
- The contractor must implement construction BMPs and install silt fences/straw bales to reduce sedimentation. Area soils should be covered and/or wetted during construction. If fill is stored on site as part of unit installation or removal, the contractor is required to appropriately cover it.
- If the project results in a discharge of wastewater to an existing wastewater treatment system, that wastewater treatment system may need to modify its LPDES permit before accepting the additional wastewater

- All precautions must be observed to control nonpoint source pollution from construction activities. LDEQ has stormwater general permits for construction areas equal to or greater than one acre. The applicant must contact the LDEQ Water Permits Division at (225) 219-9371 to determine if the proposed project requires a permit.
- If the project will include a sanitary wastewater treatment facility, a Sewage Sludge and Biosolids Use or Disposal Permit application or Notice of Intent must be submitted no later than January 1, 2015. Additional information may be obtained on the LDEQ website at <http://www.deq.louisiana.gov/portal/tabid/2296/Default.aspx> or by contacting the LDEQ Water Permits Division at (225) 219- 9371.
- All practicable precautions must be observed to protect the groundwater of the region.
- Water softeners generate wastewaters that may require special limitations depending on local water quality considerations. Therefore if the water system improvements include water softeners, the applicant is to contact the LDEQ Water Permits to determine if special water quality-based limitations will be necessary.
- Any renovation or remodeling must comply with LAC 33:III.Chapter 28, Lead-Based Paint Activities; LAC 33:III.Chapter 27, Asbestos-Containing Materials in Schools and State Buildings (includes all training and accreditation); and LAC 33:III.5151, Emission Standard for Asbestos for any renovations or demolitions.
- Vehicle operation times should be kept to a minimum. Area soils must be covered and/or wetted during construction to minimize dust.
- The applicant is responsible for coordinating with and obtaining any required permit(s) from the LDNR Coastal Management Division prior to initiating work. The applicant shall comply with all conditions of the required permit. All coordination pertaining to these activities and applicant compliance with any conditions should be documented and copies forwarded to the state and FEMA for inclusion in the permanent project files.
- If human bone or unmarked grave(s) are present with the project area, compliance with the Louisiana Unmarked Human Burial Sites Preservation Act (R.S. 8:671 et seq.) is required. The applicant shall notify the law enforcement agency of the jurisdiction where the remains are located within twenty-four (24) hours of the discovery. The applicant shall also notify FEMA and the Louisiana Division of Archaeology at 225-342-8170 within seventy-two (72) hours of the discovery.

- If during the course of work, archaeological artifacts (prehistoric or historic) are discovered, the applicant shall stop work in the vicinity of the discovery and take all reasonable measures to avoid or minimize harm to the finds. The applicant shall inform their PA contacts at FEMA, who will in turn contact FEMA Historic Preservation staff. The applicant will not proceed with work until FEMA Historic Preservation completes consultation with the SHPO.
- Any fill or borrow material used must be sourced from areas that do not contain any buried cultural materials (e.g., brick foundations, prehistoric Indian artifacts, human burials, and the like).
- If any solid or hazardous wastes, or soils and/or groundwater contaminated with hazardous constituents are encountered during the project, notification to LDEQ's SPOC at (225) 219-3640 is required. Additionally, precautions must be taken to protect workers from these hazardous constituents.
- Regardless of the asbestos content, the applicant is responsible for ensuring that renovation or demolition activities are coordinated with the LDEQ. 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 at the project site, the applicant is also responsible for ensuring proper disposal in accordance with the previously referenced administrative orders. ACM/PACM must be handled in accordance with local, state and federal regulations and disposed of at approved facilities that accept ACM. Demolition activity notification must be sent to the LDEQ before work begins.
- The applicant is responsible for complying with the Toxic Substances Control Act (TSCA) Section 402(c)(3) requirements as well as to the satisfaction of the governing local, state, and federal agencies to ensure that project activities are managed, administered, and/or handled by certified/accredited technicians, contractors, and providers. The applicant is responsible complying with all local, state, and federal laws and ensuring that project activities are coordinated with the LDEQ for abatement activities
- The applicant is responsible for complying with the TSCA requirements at 40 CFR 761 for electrical equipment (including transformers) containing polychlorinated biphenyls (PCBS). These provisions address the storage and disposal of equipment containing PCBS, as well as the remediation of any PCB spills. All required agency coordination pertaining to these activities should be documented and copies forwarded to the state and FEMA as part of the permanent project files

- City of New Orleans Noise Ordinance limits noise levels by receiving land use in residential, public, commercial, and industrial areas to varying decibel levels during the “daytime” hours of 7 AM to 10 PM. Construction activities are to be limited to this schedule on weekdays. Mitigation and abatement measures are required to reduce the noise levels to a range that would be considered acceptable.
- The contractor must post appropriate signage and fencing to minimize potential adverse public safety concerns.
- The contractor must place fencing around the work area perimeters to protect nearby residents from vehicular traffic. To minimize worker and public health and safety risks from project construction and closure, all construction and closure work must be done using qualified personnel trained in the proper use of construction equipment, including all appropriate safety precautions. Additionally, all activities shall be conducted in a safe manner in accordance with the standards specified in OSHA regulations and the USACE safety manual.
- The contractor shall implement traffic control measures, as necessary.
- If hazardous materials are unexpectedly encountered in the project area during the proposed construction operations, appropriate measures for the proper assessment, remediation, management and disposal of the contamination must be initiated in accordance with applicable federal, state, and local regulations. The contractor is required to take appropriate measures to prevent, minimize, and control the spill of hazardous materials in the construction area and any offsite runoff.

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

## **7.0 PUBLIC INVOLVEMENT**

The public is invited to comment on the proposed action. A legal notice was published in The Times Picayune on Wednesday, December 10, 2014 and Friday, December 12, 2014 and in the Advocate New Orleans Edition on Monday, December 8, 2014 through Friday, December 12, 2014. Additionally, the Draft Environmental Assessment was made available at the Norman Myer Branch Library in Gentilly, and the Leonard S. Washington Memorial Library on the SUNO campus. The Environmental Assessment was also published on FEMA’s websites. A copy of the Public Notice is attached in Appendix D.

## **8.0 AGENCY COORDINATION**

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

## **9.0 LIST OF PREPARERS**

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LeSchina Holmes, Lead Environmental Protection Specialist  
Kathryn Wollan, Lead Historic Preservation Specialist, FEMA  
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Annette Carroll, Historic Preservation Specialist, FEMA  
Richard Williamson, Historic Preservation Specialist, FEMA  
John Renne, Floodplain Specialist, CFM, CTR

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**Appendix A**  
**Site Photographs**

**Appendix B**  
**Construction Plans**

**Appendix C**  
**Agency Correspondence**

**Appendix D**  
**8/Step/Public Notice/Draft FONSI**