



FEMA

U.S. Department of Homeland Security
Louisiana Recovery Office
1500 Main St
Baton Rouge, Louisiana 70114

**FINDING OF NO SIGNIFICANT IMPACT
FOR THE
SOUTHERN UNIVERSITY OF NEW ORLEANS PARK CAMPUS
CONSTRUCTION OF FIVE (5) BUILDINGS
NEW ORLEANS, LOUISIANA
*FEMA-1603-DR-LA***

BACKGROUND

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. 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 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, and the Cafeteria. 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. Demolition work was approved by the FEMA-Environmental and Historic Preservation department (EHP) as part of the replacement in-kind project.

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.

In accordance with 44 CFR Part 10, FEMA's regulations to implement the National Environmental Policy Act (NEPA), an Environmental Assessment (EA) was prepared. The purpose of the EA was to analyze the potential environmental impacts associated with proposed project and to determine whether to prepare an Environmental Impact Statement (EIS) or Finding of No Significant Impact (FONSI). The need for the proposed project is to provide residents of the community facilities capable of providing higher education while reducing the risk of flooding and future damage. The alternatives considered include 1) No Action; 2) Preferred Action: Demolish Multi-Purpose Classroom Building, Brown Hall, New Classroom Building, and the Central Plant and Construct Five (5) New Buildings; and 3) Alternate Action: Replace the Multi-Purpose Classroom Building, Brown Hall, New Classroom Building, Clark Hall, and the Central Plant in the Pre-disaster Footprints.

FINDINGS

FEMA has evaluated the proposed project for significant adverse impacts to geology, soils, water resources (surface water, groundwater, and wetlands), floodplains, coastal resources, air quality, biological resources (vegetation, fish and wildlife, Federally-listed threatened or endangered species and critical habitats), cultural resources, socioeconomics (including minority and low income populations), safety, noise, and hazardous materials. The results of these evaluations as well as consultations and input from other federal and state agencies are presented in the EA.

The applicant chose the proposed project to decrease the flood risk by moving some functions to the Lake Campus, which is out of the floodplain and construct new buildings to current floodplain codes and standards.

CONDITIONS

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

- 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.

- 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 U. S. Army Corps of Engineers (USACE) regulatory requirements.
- If the project results in a discharge of wastewater to an existing wastewater treatment system, that wastewater treatment system may need to modify its Louisiana Pollutant Discharge Elimination System (LPDES) permit before accepting the additional wastewater
- 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 Digital Flood Insurance Rate Map, Base Flood Elevation, or local floodplain ordinances, whichever is more stringent.
- All precautions must be observed to control nonpoint source pollution from construction activities. Louisiana Department of Environmental Quality (LDEQ) has stormwater general permits for construction areas equal to or greater than one acre. It is recommended that you contact the LDEQ Water Permits Division at (225) 219-9371 to determine if your proposed project requires a permit.
- If the project will include a sanitary wastewater treatment facility, a Sewage Sludge and Biosolids Use or Disposal Permit application or Notice of Intent must be submitted no later than January 1, 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.
- Vehicle operation times should be kept to a minimum. Area soils must be covered and/or wetted during construction to minimize dust.
- 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 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.
- The applicant is responsible for coordinating with and obtaining any required permit(s) from the Louisiana Department of Natural Resources (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 State Historic Preservation Officer.
- 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 Single-Point-of-Contact (SPOC) at (225) 219-3640 is required. Additionally, precautions should be taken to protect workers from these hazardous constituents.
- 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

- 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 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 will be required to reduce the noise levels to a range that would be considered acceptable.
- 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 Occupational Safety and Health Administration (OHSa) regulations and the USACE safety manual.
- The contractor must post appropriate signage and fencing to minimize potential adverse public safety concerns.
- 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.

CONCLUSIONS

Based upon the incorporated EA, and in accordance with Presidential Executive Orders 12898 (Environmental Justice), 11988 (Floodplain Management), and 11990 (Wetland Protection), FEMA has determined that the proposed action implemented with the conditions and mitigation measures outlined above and in the EA will not have any significant adverse effects on the quality of the natural and human environment. As a result of this FONSI, an Environmental Impact Statement will not be prepared (44 CFR Part 10.8) and the proposed action alternative as described in the EA may proceed.

APPROVALS

Kevin Jaynes Regional Environmental Officer Region VI	Date
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Mike Womack Director of the Louisiana Recovery Office FEMA 1603-1607-DR-LA	Date
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