

Draft Tiered Site-Specific Environmental Assessment

Vermilion Parish Abbeville General Hospital Safe Room

Abbeville, Vermilion Parish, Louisiana

HMGP-DR-1786-LA PROJECT # 160

August 2016



FEMA

Federal Emergency Management Agency
Department of Homeland Security
800 North Loop 288
Denton, TX 76209

I. Background

In accordance with 44 Code of Federal Regulations (CFR) for the Federal Emergency Management Agency (FEMA), Subpart B, Agency Implementing Procedures, Part 10.9, a Programmatic Environmental Assessment (PEA) for Hazard Mitigation Safe Room Construction was prepared and a Finding of No Significant Impact (FONSI) was issued in on June 2, 2011, pursuant to Section 102 of the National Environmental Policy Act (NEPA) of 1969, as implemented by the regulations promulgated by the President's Council on Environmental Quality (CEQ; 40 CFR Parts 1500-1508). This Tiered Site-Specific Environmental Assessment (SEA) is being prepared in accordance with the June 2011 PEA. On August 22, 2016, 44 CFR Part 10 was rescinded and FEMA's implementing procedures for NEPA were codified in FEMA Directive 108-1 and FEMA Instruction 108-1-1. This SEA is being prepared in accordance with NEPA, FEMA's Instruction 108-1-1, and the CEQ's NEPA implementing regulations at 40 CFR Parts 1500-1508. The focus of this Tiered SEA is on those areas of concern requiring additional discussion or analysis that are beyond the scope of the PEA.

II. Purpose and Need

Vermilion Parish has applied for Hazard Mitigation Grant Program (HMGP) funding through the Louisiana Governor's Office of Homeland Security and Emergency Preparedness under application number HMGP-DR-1786-LA Project #160. These funds are made available as a result of the federal disaster declaration that followed the landfall of Hurricane Gustav in September 2008. Wind damage was significant in areas from the south-central coast of Louisiana through greater Baton Rouge with this hurricane. Power was knocked out for days, some areas longer, across this region, with numerous trees down and other related wind damage. Tornadoes were reported in St. Tammany and Jefferson Parishes with several structures being damaged. Storm surge was a significant problem in parts of coastal Louisiana and along tidal lakes and rivers as Gustav moved onshore. Heavy rainfall affected parts of the state as well, including West Baton Rouge, Orleans, St. Tammany, and Vermilion Parishes.

Section 404 (HMGP) of the Robert T. Stafford Relief and Emergency Assistance Act, 42 U.S.C. § 5170c, authorizes FEMA to provide funding to eligible grant applicants for cost effective activities that have the purpose of reducing or eliminating risks to life and property from hazards and their effects. Mitigation grant program regulations and guidance that implement these authorities identify various types of hazard mitigation projects or activities that meet this purpose and may be eligible for funding. These projects represent a range of activities that protect structures, the contents within those structures, and/or the lives of their occupants.

The purpose of the proposed project is to provide near-absolute life safety protection for the hospital personal and patients that cannot be relocated prior to, during, and after a hurricane event. Vermilion Parish Abbeville General Hospital's (AGH) ability to safely house and protect their personal and patients will prevent a lapse in the availability of medical services and will ensure the overall health of the community can be effectively managed during and immediately after an event. The city of Abbeville is located northeast within the parish along a main access road, Highway 14. The U.S. Census Bureau estimates the population of Abbeville is 12,446 (2014 estimate), and the Vermilion Parish population is 59,875 (2015 estimate). The Vermilion Parish Hazard Mitigation Plan (VPHMP) (March 2011) identifies hurricanes/tropical storms as one of the more frequent hazards for the parish. As such, safe rooms for critical facilities are

identified in the action plan. There have been 15 hurricane/tropical storms affecting the area since 1957, according to VPHMP submitted with the application.

III. Alternatives

Two project alternatives are proposed in this SEA: 1) No Action Alternative and 2) Proposed Action Alternative- Construction of a Safe Room at the AGH.

Under the No Action Alternative, nothing would be done to address the risk of hurricanes and tornadoes in the project area. A safe room would not be constructed. As a consequence, hospital personal, patients, and local citizens seeking medical care would remain at risk and would continue to be in danger when hurricanes and other quickly arising high wind events target the project area. There will be no environmental impacts as a result of this alternative.

The Proposed Action Alternative involves the construction of a new dual use building addition for dual use safe-room at AGH located on 118 N. Hospital Drive, Abbeville, Vermilion Parish, Louisiana (29.97.4248, -92.108517). An existing structure will be demolished in order to construct the safe room and administration building. The proposed dual-use safe room would provide near-absolute life safety protection for critical/essential hospital services personnel and patients that for specific reasons cannot be transported to other facilities during a hurricane. When not in use as a safe room, the facility would serve as an in-patient psychiatric unit. The project also includes construction of an exterior covered space and connecting corridor/vestibule which would be built with separate funds. The proposed safe room will have a protected space of approximately 12,517 square feet and will have a gross square footage of approximately 14,405 square feet. The exterior covered space and connecting corridor/vestibule will be approximately 1,888 gross square feet. The safe room will be built in accordance with *FEMA P-361, Safe Rooms for Tornadoes and Hurricanes: Guidance for Community and Residential Safe Rooms, Third Edition (2015)*.

IV. Environmental Impacts

Discussion of the environmental impacts associated with the No Action Alternative is included in the June 2011 PEA. This document incorporates the PEA by reference. The PEA can be found in FEMA’s electronic library at <http://www.fema.gov/library/viewRecord.do?id=4670>.

FEMA’s environmental planning and historic preservation review reveals that all environmental areas of concern are appropriately accounted for in the PEA with the exception of floodplain impacts. Table 1 provides a summary of the findings for the environmental areas of concern that FEMA typically reviews.

Table 1: Summary of Other Environmental Areas of Concern

Area of Concern	No Action Impacts	Proposed Action Impacts
Land Use	No effect.	Land use impacts are not analyzed further in this SEA because they do not reach a level of significance as outlined in the

		<p>PEA. The proposed action would have minor impacts to land use and would be consistent with surrounding or planned land uses in the short- or long-term. The project would disturb less than 5 acres. No special land use permit or waiver will be required because this land is already zoned for public use. The project is not within the Louisiana Coastal Zone or within Coastal Barrier Resource Units. Per coordination with the Natural Resources Conservation Service (NRCS), the Proposed Action is exempt from the Farmland Protection Policy Act (FPPA) because the site is located within an urban area (Appendix B).</p>
<p>Geology, Soils, and Seismicity</p>	<p>No effect.</p>	<p>Impacts to geology, soils, and seismicity are not analyzed further in this SEA because they do not reach a level of significance as outlined in the PEA. The safe room project will not disturb more than 5 acres of land, and it is not located in an area subject to tsunami, seismic, volcanic, erosion, landslide, mudslide, or structural instability hazards. The proposed action is not subject to the FPPA.</p>
<p>Water Quality and Resources</p>	<p>No effect.</p>	<p>Water quality impacts are not analyzed further in this SEA because they do not reach a level of significance as outlined in the PEA. During the construction phase, the proposed action would have minor temporary effects to water quality that would be at or below water quality standards or criteria. The proposed action would not cause or contribute to existing exceedances of water quality standards on a short-term or prolonged basis. The proposed action would not disturb more than 5 acres of land. The applicant coordinated with the Louisiana Department of Environmental Quality (LDEQ). The LDEQ has no objections to the proposed project and provided comments. The applicant must adhere to the LDEQ conditions and comments (see Appendix B).</p>

Wetlands	No effect.	Impacts to wetlands are not analyzed further in this SEA because they do not reach a level of significance as outlined in the PEA. The project will have no effect on wetlands because the project is located outside of designated wetlands per the U.S. Fish and Wildlife Service National Wetland Inventory Map, accessed on 3/30/2016.
Biological Resources	No effect.	<p>Impacts to biological resources, including federally threatened and endangered species and critical habitat, are not analyzed further in this SEA because they do not reach a level of significance as outlined in the PEA. Per the U.S. Fish and Wildlife’s species list (2015), the Piping Plover (<i>Charadrius melodus</i>); Red Knot (<i>Calidris canutus rufa</i>); Atlantic Sturgeon (<i>Acipenser oxyrinchus (=oxyrhynchus) desotoi</i>); Green Sea Turtle (<i>Chelonia mydas</i>); and Loggerhead Sea Turtle (<i>Caretta caretta</i>) are federally threatened species that are known to occur in Vermilion Parish. The West Indian Manatee (<i>Trichechus manatus</i>); Hawksbill Sea Turtle (<i>Eretmochelys imbricate</i>); Kemp's Ridley Sea Turtle (<i>Lepidochelys kempii</i>); and Leatherback Sea Turtle (<i>Dermochelys coriacea</i>) are federally endangered species that are known to occur in Vermilion Parish. The safe room site is not designated as critical habitat for any listed species according to the USFWS critical habitat mapper. The United States Fish and Wildlife Service (USFWS) on-line technical services form suggests a “no effect” conclusion is appropriate. Therefore, FEMA has determined the project will have no effect on threatened and endangered species and will not adversely modify or otherwise affect critical habitat. The proposed action would have negligible impacts to native species and their habitats and population levels of native species would not be affected. Sufficient habitat would remain functional to maintain viability of all</p>

		species.
Human Health and Safety	Hospital personnel and patients would remain vulnerable to high wind hazards and/or would not be able to remain at the hospital during high wind events. Continuity of Hospital operations for patients that cannot be evacuated before, during, and after a high wind and flooding events would be compromised, increasing risk to patients' lives and safety.	Human health and safety impacts are not analyzed further in this SEA because they do not reach a level of significance as outlined in the PEA. Wastes resulting from the proposed action would be safely and adequately managed in accordance with all applicable regulations and policies. There would be no short- or long-term adverse impacts to public safety. AGH personal, patients, and local citizens requiring medical assistance would benefit from the safety provided by the facility. The proposed action would not result in an exceedance of available waste disposal capacity nor would it result in regulatory violation(s). Per the PEA FONSI, excavated soil and waste materials will be managed and disposed of in accordance with applicable local, state, and federal regulations. If contaminated materials are discovered during construction activities, the work will cease until the appropriate procedures and permits are implemented. This is a required condition of the grant award.
Minority and Low-Income Populations	No effect.	Impacts to minority and low-income populations were not examined in the SEA because the threshold of significance outlined in the PEA was not exceeded. Though low-income and minority populations exist in the project area, no disproportionate adverse impacts to these portions of the population is anticipated.
Historic Properties	No effect.	Impacts to historic properties are not analyzed further in this SEA because they do not reach a level of significance as outlined in the PEA. FEMA determined in accordance with CFR 36 Part 800.4(d)(1) that there would be no effect to historic properties, including structural and archeological resources, due to the Proposed Action Alternative. The State Historic Preservation Office (SHPO) concurred with this determination in a response letter dated July 15, 2016 (see Appendix B). Per the PEA FONSI, if ground disturbing activities occur during

		<p>construction, the applicant will monitor ground disturbance and if any potential archeological resources are discovered, will immediately cease construction in that area and notify the State and FEMA. This is a required condition of the grant award.</p> <p>Consultation with tribes listed in Section VI, was conducted per 36 CFR §800.2(c)(2)(i)(B), dated July 11, 2016. The tribes listed in Section VI did not provide comments within 30 days or declined to comment. FEMA has determined that proposed project will not adversely affect traditional, religious, or culturally significant sites.</p>
Air Quality	No effect.	<p>Air quality impacts are not analyzed further in this SEA because they do not reach a level of significance as outlined in the PEA. Minor short-term effects to air quality are anticipated during the safe room construction. Emissions in attainment areas, such as Vermilion Parish, would not cause air quality to go out of attainment for any National Ambient Air Quality Standards. Dust mitigation techniques are included in the Section 7 Mitigation Measures of the PEA. Implementation of the Section 7 measures are a requirement of the PEA FONSI.</p>
Noise	No effect.	<p>Noise impacts are not analyzed further in this SEA because they do not reach a level of significance as outlined in the PEA. Noise levels resulting from the proposed action would not exceed typical noise levels expected from construction equipment or generators. Noise generated by construction and operation of the facility would be temporary or short-term in nature. There would be minor to moderate temporary adverse noise effects during construction of the safe room. The applicant must follow the noise mitigation measures as identified in Section 7 of the PEA to the maximum extent possible. These measures include limiting</p>

		construction activities to normal business hours.
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In compliance with FEMA regulations implementing Executive Order 11988, Floodplain Management, FEMA is required to carry out the 8-step decision-making process for actions that are proposed in the floodplain per 44 CFR § 9.6. Step 1 is to determine whether the project is located in the floodplain. Because FEMA considers the construction of community safe rooms as critical actions, the proposed project must be reviewed to determine whether it is located within the 100-year or 500-year floodplain.

FEMA has determined that the Proposed Action Alternative is located in the 500-year floodplain, Zone X (shaded), as depicted on FEMA's Flood Insurance Rate Map (FIRM) 22113C0355F, dated 01/19/2011 (see Figure 1). Zone X (shaded) indicates an area with moderate flood hazard, the area between the limits of the base flood and the 0.2-percent-annual-chance (or 500-year) flood. Based on the FEMA Flood Insurance Study Profile, the 500-year elevation at the safe room site is estimated to be approximately 13.7 feet. Standard Flood Insurance Study (FIS) hydrologic and hydraulic methodologies were used to determine the flood profiles and the subsequent mapping.

Step 2 is to notify and involve the public in the decision-making process, which will be incorporated into the notice of availability for this SEA.

Step 3 is to identify and evaluate practicable alternatives to locating the proposed project in the floodplain, including alternative sites and actions outside of the floodplain. The alternatives considered by the applicant were the 1) No Action Alternative and the 2) Proposed Action Alternative—construction of a dual use safe-room at AGH. The applicant has not considered any sites outside of the floodplain because the entire AGH property is located within a floodplain and location off-site from the AGH would not provide the intended protection to hospital personal and AGH patients. Large areas of the City of Abbeville and its surrounding areas are located in Zone AE area of 100-year flooding, while there are some small areas that are designated in Zone X (shaded). There are portions to the north and east of the city that are outside of the 100-year and 500-year floodplain. In accessing risks for the AGH safe room, retrofit of critical facilities ranks highest in the needs of the community. Vermilion understands protecting the infrastructure is important, however protecting the lives of the individuals that service the infrastructure during high wind events is of utmost importance. No other location at hospital site is outside of floodplain. The proposed action's location is located in the 500-year which is lower risk than other areas of the AGH property.

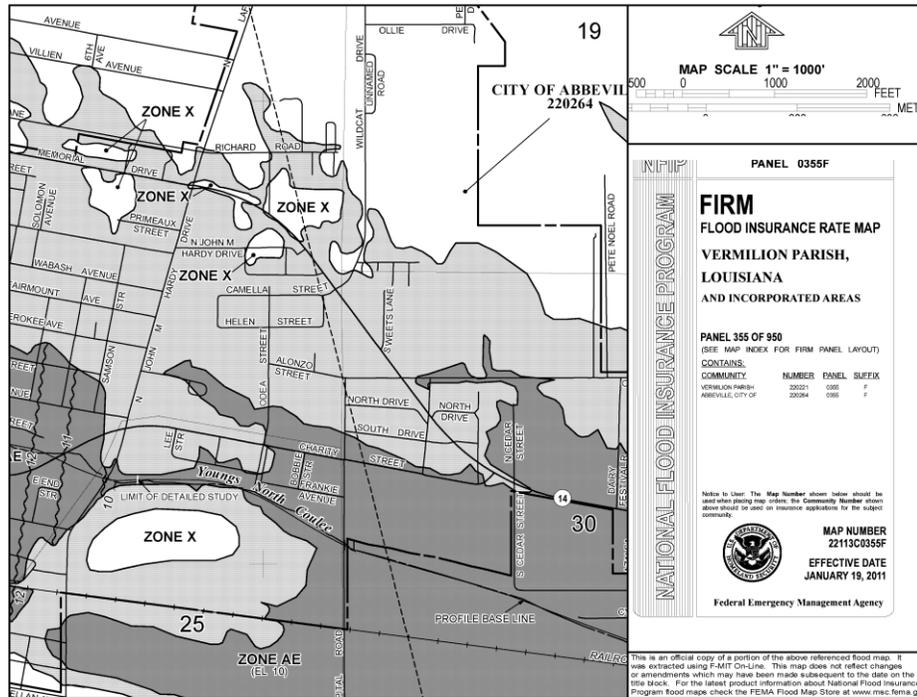


Figure 1: Proposed Action Alternative Location on FEMA FIRM Panel 22113C0355F, dated 1/19/2011.

Step 4 is to identify impacts associated with occupancy and modification of the floodplain and support of floodplain development that could result from pursuing the Proposed Action Alternative. Per 44 CFR 9.10 “Identify impacts of proposed actions,” FEMA should consider whether the proposed action will result in an increase in the useful life of any structure or facility in question, maintain the investment at risk and exposure of lives to the flood hazard, or forego an opportunity to restore the natural and beneficial values served by floodplains or wetlands. FEMA should specifically consider and evaluate impacts associated with modification of floodplains; additional impacts which may occur when certain types of actions may support subsequent action which have additional impacts of their own; adverse impacts of the proposed actions on lives and property and on natural and beneficial floodplain values; and these three categories of factors: flood hazard-related factors, natural values-related factors, and factors relevant to a proposed action’s effects on the survival and quality of wetlands. Per 44 CFR, natural values-related factors include, water resource values (natural moderation of floods, water quality maintenance, and ground water recharge); living resource values (fish and wildlife and biological productivity); cultural resource values (archeological and historic sites, and open space recreation and green belts); and agricultural, aquacultural and forestry resource values. Factors relevant to a proposed action’s effects on the survival and quality of wetlands include public health, safety, and welfare, including water supply, quality, recharge and discharge; pollution; flood and storm hazards; and sediment and erosion; maintenance of natural systems, including conservation and long term productivity of existing flora and fauna, species and habitat diversity and stability, hydrologic utility, fish, wildlife, timber, and food and fiber resources; and other uses of wetlands in the public interest, including recreational, scientific, and cultural uses.

Building the safe room in the floodplain may increase the risk of structural damage to the safe room itself due to flooding. In addition, there is safety risk to the populations that might be sheltering in the safe room during a 500 year flood event. It is not anticipated that the Proposed Action Alternative will result in an increased base discharge nor should it increase the flood hazard potential to other structures. The City of Abbeville and surrounding areas are already developed and the majority of the area is located in the 100- or 500-year floodplain. The addition of a safe room to protect lives urban, developed area is not anticipated to encourage development in the floodplain beyond current conditions. The safe room is intended to serve existing populations and it is not anticipated that the construction of the safe room will encourage increased occupancy in the surrounding floodplain areas. The parcel does not offer suitable habitat for any federally listed species, but could support native plant and wildlife species if allowed to return to its native state.

The functions of the floodplain to provide flood storage and conveyance, filter nutrients and impurities from runoff, reduce flood velocities, reduce flood peaks, moderate temperature of water, reduce sedimentation, promote infiltration and aquifer recharge, and reduce frequency and duration of low surface flows will remain intact after the implementation of the project. There will be minor reductions in these services due to the conversion of less than 1 acre of undisturbed land, but there will not be significant adverse impacts to these services provided by the floodplain. Development of the site will not impact groundwater recharge. Water quality may be impacted during the construction phase due to sedimentation and run-off. These impacts are considered to be minor and temporary effects to water quality that would be at or below water quality standards or criteria. The proposed action would not cause or contribute to existing exceedances of water quality standards on a short-term or prolonged basis. There will not be impacts to wetlands.

Floodplains also provide services in the form of providing fish and wildlife habitat, breeding, and feeding grounds. These floodplain values will not be adversely impacted and the overall integrity of the ecosystem will not be impacted. FEMA has determined the project will have no effect on threatened and endangered species and will not adversely modify or otherwise affect critical habitat. The proposed action would have negligible impacts to native species and their habitats and population levels of native species would not be affected. Sufficient habitat would remain functional to maintain viability of all species.

Step 5 is to minimize the potential adverse impacts and support to or within floodplains identified under Step 4 and restore and preserve the natural and beneficial values served by floodplains. Many of the impacts discussed above are considered insignificant and mitigation is not practicable or warranted. Best management practices (BMPs) are included in the Section 7 Mitigation Measures of the PEA. Implementation of the Section 7 measures is a requirement of the PEA FONSI. As explained above, construction of the safe room is not expected to result in an increased base discharge nor will it increase flood hazard to other structures. The safe room footprint is minor when compared to the extensiveness of the 500-year and 100-year floodplain in the City of Abbeville and surrounding areas. In order to reduce the impacts identified in Step 4 of flooding on the proposed structure and its occupants, the structure and its supporting utilities will be elevated at or above the 500-year elevation because the construction of a safe room is considered a critical action. The finished floor will be at or above the 500-year flood elevation of 13.7 feet. In addition, Vermilion Parish received a letter of "no objection" from the local Floodplain Administrator, dated April 24, 2014. Applicant would obtain required permits prior to initiating work (see Appendix B). 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. The construction of the safe room to the 500-year elevation would ensure compliance with the National Flood Insurance Program.

Step 6 is to determine whether the proposed action is practicable and to reevaluate alternatives. Per the discussion above, including elevating to mitigate flood risk to the safe room and the unavailability of a location outside of the floodplain, the Proposed Action Alternative is the only practicable alternative.

Step 7 requires that the public be provided with an explanation of any final decision that the floodplain is the only practicable alternative. In accordance with 44 CFR § 9.12, Vermilion Parish must prepare and provide a final public notice 15 days prior to the start of construction activities.

Step 8 is the review of the implementation and post-implementation phases of the proposed action to ensure that the requirements stated in 44 CFR Part 9.11 are fully implemented. The proposed safe room project will be constructed in accordance with applicable floodplain development requirements and in line with the conditions outlined below.

V. Mitigation

- 1) Excavated soil and waste materials will be managed and disposed of in accordance with applicable local, state, and federal regulations. If contaminated materials are discovered during construction activities, the work will cease until the appropriate procedures and permits are implemented.
- 2) The grantee and sub grantee will follow applicable mitigation measures as identified in Section 7 of the PEA to the maximum extent possible.
- 3) If ground disturbing activities occur during construction, applicant will monitor ground disturbance and if any potential archeological resources are discovered, will immediately cease construction in that area and notify the State and FEMA.
- 4) 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.
- 5) Vermilion Parish must elevate the safe room at or above the 500-year floodplain elevation of 13.7 feet.
- 6) In accordance with 44 CFR § 9.12, Vermilion Parish must publish a public notice 15 days prior to the start of construction activities.
- 7) This review does not address all federal, state and local requirements. Acceptance of federal funding requires recipient to comply with all federal, state and local laws. Failure to obtain all appropriate federal, state and local environmental permits and clearances may jeopardize federal funding.
- 8) Changes, additions, and/or supplements to the approved scope of work which alter the existing use and function of the structure, including additional work not funded by FEMA but performed substantially at the same time, will require re-

submission of the application prior to construction to FEMA for re-evaluation under the National Environmental Policy Act.

- 9) Vermilion Parish must comply with the conditions stated in the PEA FONSI, dated June 2, 2011, for the Proposed Action Alternative (see Appendix A).

VI. Agencies Consulted – update with Tribes and SHPO

1. United States Fish and Wildlife Service
2. Louisiana Department on Environmental Quality
3. Vermilion Parish Floodplain Administrator
4. Louisiana State Historic Preservation Office
5. Chitimacha Tribe of Louisiana
6. Choctaw Nation of Oklahoma
7. Coushatta Tribe of Louisiana
8. Eastern Shawnee Tribe of Oklahoma
9. Jena Band of Choctaw Indians
10. Mississippi Band of Choctaw Indians
11. Tunica Biloxi Tribe of Louisiana

Public Comment

A public notice advertising the availability of this Draft SEA for public review and comment will be posted in the local newspaper of record and on the FEMA website at <http://www.fema.gov/library>. A 15-day public comment period will commence on the initial date of the public notice. FEMA will consider and respond to all substantive public comments in a Final SEA. If no substantive comments are received, the Draft SEA will become final and a FONSI will be issued for the project.

List of Preparers/Reviewers

Sarah Carrino, Principal Preparer, Environmental Specialist, FEMA Region 6
Dorothy Cook, Principal Reviewer, Environmental Historic Preservation Team Lead, FEMA Region 6
Sarah Forbes, Reviewer, Historic Preservation Specialist, FEMA Region 6
Kevin Jaynes, Reviewer, Regional Environmental Officer, FEMA Region 6

References

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- United States Census Bureau. 2015. Quick Facts: Abbeville city, Louisiana. Available on-line at <http://www.census.gov/quickfacts/table/PST045215/2200100,22113>. Accessed March 2016.
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Appendix A

Finding of No Significant Impact (FONSI)

Final Programmatic Environmental Assessment for Hazard Mitigation Safe Room Construction

Appendix B

Agency Correspondence

Appendix C

500-Year Elevation Determination