Draft Environmental Assessment

Peebles/Grand Marais Elementary School Relocation

Iberia Parish, Louisiana

FEMA-1607-DR-LA

March 2007

Federal Emergency Management Agency
U.S. Department of Homeland Security
Louisiana Transitional Recovery Office
New Orleans, Louisiana 70114

FEMA

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LIST OF ACRONYMS

ABFE	Advisory Base Flood Elevation
ACHP	Advisory Council on Historic Preservation
BMP	Best Management Practices
CAA	Clean Air Act
CBRA	Coastal Barrier Resources Act
CBRS	Coastal Barrier Resources System
CCC	Civilian Conservation Corps
CUP	Coastal Use Permit
CWA	Clean Water Act
CZMA	Coastal Zone Management Act
EA	Environmental Assessment
EIS	Environmental Impact Statement
EPA	Environmental Protection Agency
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
GOHSEP	Governor's Office of Homeland Security and Emergency Preparedness
LDEQ	Louisiana Department of Environmental Quality
LDNR	Louisiana Department of Natural Resources
MOA	Memorandum of Agreement
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NFIP	National Flood Insurance Program
NGVD	National Geodetic Vertical Datum
NHPA	National Historic Preservation Act
NRHP	National Register of Historic Places
NRCS	Natural Resources Conservation Service
OPA	Otherwise Protected Area
POTW	Publicly Owned Treatment Works
RCRA	Resource Conservation and Recovery Act
RCW	Red-Cockaded Woodpecker
RFP	Request for Proposal
RHA	Rivers and Harbors Act
SHPO	State Historic Preservation Office/Officer
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
VRP	Volunteer Remedial Program
WSRA	Wild and Scenic Rivers Act

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DRAFT
ENVIRONMENTAL ASSESSMENT
FOR
PEEBLES/GRAND MARAIS ELEMENTARY SCHOOL RELOCATION
IBERIA PARISH, LOUISIANA

FEMA-1607-DR-LA

1.0 INTRODUCTION

1.1 Project Authority

Hurricane Rita, a Category 3 hurricane with a strong storm surge, made landfall on September 24, 2005, causing catastrophic damage to the western parishes of Louisiana. Maximum sustained winds at landfall were estimated at 120 miles per hour. President Bush declared a major disaster for the State of Louisiana due to damages from Hurricane Rita and signed a disaster declaration (FEMA-1607-DR-LA) on September 24, 2005, authorizing the Department of Homeland Security's Federal Emergency Management Agency (FEMA) to provide federal assistance in designated areas of Louisiana. FEMA administers 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 Program to repair, restore and replace 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 regulations implementing NEPA (40 CFR 1500-1508); and FEMA's regulations implementing NEPA (44 CFR 10.9). The purpose of this draft EA is to analyze the alternatives and assess the potential environmental impacts associated with the relocation of two existing elementary schools to a proposed new facility to be constructed. 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

Hurricane Rita flooded the southern coast of Iberia Parish on September 24, 2005, with a three-foot surge of salt water inundating the Peebles Elementary School, located at 4915 Weeks Island Road in New Iberia, Louisiana. Peebles Elementary is a public educational facility owned and operated by the Iberia Parish School Board at that time, serving 308 students in grades three through six, and Special Education. The main building is a single-story, 16,485 square-foot brick slab-on-grade structure with a built-up flat roof. Due to standing water in the building for six days, damage to the facility included destroyed electrical and mechanical components, floors, ceilings, walls and contents. In addition, other buildings in the campus complex (library building, a mechanical building, a storage building and four portable buildings), were damaged.

Grand Marais Elementary School, located at 3319 College Road in Jeanerette, Louisiana, is also part of the Iberia Parish School Board system and is within the same attendance zone as Peebles, serving approximately 250 students in grades K through 2. The campus includes a 15,474 square-foot, single-story brick masonry main building and six portable buildings. Strong winds from the hurricane, along with wind driven rain, flying debris, power surges and power outages combined to cause damage to the facility, mainly to the roof of the main building and to building contents. Repairs have been completed and the building is again fully functional.

The school board has provided for temporarily displaced students by assigning the Peebles third grade students to Grand Marais, with grades 4 through 6 being temporarily housed at the Belle Place Middle School, located in the northern portion of the Parish.

2.0 PURPOSE AND NEED

As a result of Hurricane Rita, Peebles Elementary School was inundated with salt water for six days, which damaged the buildings that are part of the school complex. Grand Marais Elementary was also damaged by the storm, but to a lesser degree.

Prior to Hurricane Rita, the Iberia Parish School Board was already considering leaving the current location of the Peebles Elementary School. The current location of the school is in close proximity to the Port of Iberia. Growth at the Port has been substantial in recent years, with repeated expansion of port facilities in the direction of the school. In addition, this recent growth has resulted in changes in the land use in the immediate vicinity of the school, from a relatively quiet residential/light commercial area to a busy industrial complex. Traffic on Weeks Island Road, where the school is located, currently includes large trucks and heavy equipment vehicles, and there has been an increase in traffic accidents in recent years. On at least two occasions, incidents at the Port or vehicle accidents involving toxic or hazardous materials has caused the school campus to be evacuated and temporarily closed due to fears of contamination or toxic fumes.

Therefore, FEMA and the Iberia Parish School Board has determined the need to provide a school with the same capacity (approximately 560 students) as the original Peebles and Grand Marais Elementary Schools] in a location with compatible adjacent land use, located within the same geographic area that the students were previously drawn from, and outside of the 100-year floodplain..

3.0 ALTERNATIVES

3.1 Alternative 1 - No Action

Under this alternative, the Iberia Parish School Board would not replace or repair the Peebles school building. Displaced students would continue attending the alternative facilities at Grand Marais Elementary School and Belle Place Middle School, with the additional travel time and inconvenience.

3.2 Alternative 2 – Construction of a New Elementary School Relocating Peebles and Grand Marais Elementary Schools (Proposed Action)

The location for the proposed new elementary school is a 15-acre parcel northwest of the intersection of US 90 and Parish Road 211 (Darnell Road) in New Iberia, Iberia Parish, Louisiana. The site was historically used as sugarcane cropland. To the north is additional planted sugarcane land. South is the US 90 service road, then US 90, across from which is mixed agricultural, commercial and residential development. Additional sugarcane cropland is to the east. A commercial building and residential dwellings front on the service road to the west and additional residential structures are located near the central portion of the western boundary. Otherwise, the property to the west is sugarcane cropland *(see Figure 1 and photos in Appendix A).*

The proposed location is approximately two miles northeast of the current Peebles Elementary location. Grand Marais Elementary School is approximately two miles southeast of the proposed new location. Therefore the proposed new school site is approximately equidistant between the two schools (s*ee Figure 1).*

The proposed action involves the construction of a new 66,778 square-foot school building serving students in pre-kindergarten through 6th grade (*see Figures 2 through 5).* The proposed design of the new structure is rough-face cinder blocks with exterior brick veneer with a metal roof. The foundation would be a post-tension concrete slab. Water service would require connection to existing lines located approximately 1.5 miles from the site.

At the time this draft EA was prepared, the School Board was considering two options for the management of wastewater from the proposed facility: the first option involves construction of a modular wastewater treatment plant and lift station on site, with the treated effluent being discharged to a drainage ditch south of the property. The second option involves creating approximately 2,200 feet of pipe to connect to the existing municipal sanitary sewer lines.

3.3 Alternatives Eliminated From Further Consideration

3.3.1 Relocation of Peebles Elementary School Students to Grand Marais Elementary School

Prior to Hurricane Rita, the Iberia Parish School Board was considering transferring the students at Peebles to Grand Marais, after appropriate remodeling and enlargement of the Grand Marais facility. This alternative was being investigated due the Board's increasing concerns regarding the health and safety of the students at the Peebles location.

After the storm, the Board determined that the most logical solution would be to have the students in a facility located north of Grand Marais, away from the more flood prone areas south of US 90. In addition, the board determined that remodeling Grand Marais would involve much higher costs than initially anticipated due to the age of the structure and its having to be brought into compliance with current building codes and standards,

including American with Disabilities Act (ADA) requirements. The board's decision eliminated this alternative as a feasible alternative and therefore it is not studied in detail as part of this draft EA.

3.3.2 Reconstruction of Peebles Elementary School

One alternative considered was the reconstruction of the existing Peebles Elementary School to its pre-disaster location, function and capacity. Elevation to the Advisory Base Flood Elevation (ABFE) would not be required as a condition of the repairs.

The alternative of rebuilding the school at its pre-storm location is not considered a viable alternative to be carried forward for the following reasons:

- **100-Year Floodplain**: Executive Order 11988 (Floodplain Management) requires federal agencies to avoid or minimize development in the floodplain except when there are no practicable alternatives. The current elementary school is located within an "A" zone, defined as an area of 100-year flooding, as per Flood Insurance Rate Map (FIRM) panel number 2200780120D, dated September 28, 1990 (s*ee Figure 6).* The presence in the floodplain imposes certain additional requirements for construction activities. The school board would be required to coordinate with the local Floodplain Administrator regarding floodplain permits prior to the start of any activities and would be responsible for meeting all requirements of the permits. Per 44 CFR 9.11(d)(9), the replacement of building contents, materials and equipment, should be, where possible, wet or dry proofed, elevated or relocated to or above the ABFE. Elevation information, signed and sealed by a licensed surveyor, engineer, or architect must be obtained and filed for verification of compliance.

  There are practicable alternatives to rebuilding the school at its pre-disaster location, which is within the 100-year floodplain. In its current location, the possibility of sustaining future damages to the structure due to repeated flooding cannot be ruled out.

- **Proximity to Port of Iberia:** The current location of Peebles Elementary School on Weeks Island Road (SR 83) in New Iberia is just east of the Port of Iberia. The Port has experienced substantial growth in recent years, with repeated expansion to the east, placing it ever closer to the school. This proximity has raised potential safety concerns for students. Currently, numerous activities of the Port, including a new ship channel just across the highway, are changing the land use of the immediate vicinity of the school from a relatively quiet residential/light commercial area to a busy industrial complex. The School Board has determined that a healthier, safer environment would be beneficial to the students served by the school.

Because there are practicable alternatives to rebuilding the school at the pre-disaster site, which is in the 100-year floodplain, and because adjacent land use at the pre-disaster site

is no longer compatible with a school, this alternative is not considered feasible and will not be studied in detail in the draft EA.

3.3.3 Other Alternative Locations

After determining that the interests of students in the district would best be served by re-locating Peebles Elementary and Grand Marais Elementary School students to a new location, the Iberia Parish School Board sought a property that would be within the attendance zone and out of the 100-year floodplain. Through advertising and researching ownership within the appropriate geographic area, the Board identified only one property owner that had expressed an interest in negotiating the sale of a site to the School Board. The site offered is the site now being considered. The Board determined that the selected site met all the desired requirements and would be a suitable location to consider.

The proposed site is considered adequate for the following reasons:

- **Floodplain** – The proposed location is within a "C" zone, defined as being an area of minimal flooding, outside of the 100-year floodplain. The likelihood of future damages as a result of flooding is considered minimal (*See Figure 7)*.

- **Convenience** – The site's physical location is approximately equidistant between the current locations of Peebles and Grand Marais Elementary Schools, which would provide convenient access for parents and bus transportation.

- **Safety** – The proposed new school site is located on the US 90 frontage road, which is a relatively lightly traveled thoroughfare, well removed from the heavily traveled and high-speed highway. Also, due to the site's location near the underpass for US 90 and John Darnell Road, bus operators serving the proposed school or parents can cross US 90 at a controlled access point rather than an unprotected intersection. Other underpass crossings are available further to the east and west for parents traveling from other areas.

Because no other sites were made available for sale and the proposed site meets the above listed criteria, no additional alternative sites will be sought or studied in detail in this draft EA.

4.0 AFFECTED ENVIRONMENT AND IMPACTS

4.1 Geology and Soils

The geology of the area, which includes the original school site as well as the proposed school site, is predominantly Holocene alluvium of the Mississippi, Red, Ouachita, and other rivers and smaller tributaries, together with coastal marsh deposits. The alluvium consists of sandy and gravelly channel deposits mantled by sandy to muddy natural levee deposits, with organic rich muddy back swamp deposits in between; coastal marsh deposits are chiefly mud and organic matter (Geology.com).

The original site of the Peebles School is approximately 10-acres located near Lydia in Iberia Parish. The topography of the site is generally flat. The grounds consist of the school, play area and regularly mowed grassy areas. According to the Natural Resources Conservation Service (NRCS) Web Soil Survey, the soil of the original site is Galvez silt loam. Galvez silt loam soils are defined as somewhat poorly drained, nearly level, loamy soils. Because the site is developed, there are no prime or unique farmlands associated with the site.

The proposed site is approximately 15 acres in Iberia Parish, in the City of New Iberia. The topography of the area is generally flat. According to the NRCS Web Soil Survey, the soil of the proposed site is Jeanerette silt loam, and is defined as somewhat poorly drained, nearly level, alkaline, loamy soil. Sugarcane and rice have historically been the principal crops cultivated in this type of soil. Additional details regarding soil structure may be found in a geotechnical report prepared for the site (Site Engineering, Inc. 2007).

The Farmland Protection Policy Act (FPPA) (7 U.S. Code 4201, et seq.) was enacted to minimize the unnecessary conversion of farmland to non-agricultural uses as a result of federal actions. The Act requires federal agencies to evaluate the adverse effects of their activities on prime and unique farmland. The Act requires Federal agencies to consult with the Natural Resources Conservation Service (NRCS) regarding impacts to prime and unique farmland, and farmland of statewide importance.

The proposed project site has been producing sugarcane (*Saccharum sp.*) for the last 70 years. The surrounding land use at the proposed site is predominately agricultural fields producing sugarcane, and a few businesses and residences scattered along US 90. According to the NRCS, the proposed site is prime farmland.

Alternative 1 - No Action: The No Action alternative would have no impacts on geology or soils and no impacts on prime, unique, statewide, or locally important farmland.

Alternative 2 – Construction of a New Elementary School Relocating Peebles and Grand Marais Elementary Schools (Proposed Action): Under Alternative 2, the construction of the new school would affect soils, primarily as part of site preparation and building construction. The proposed site is relatively flat so grading to accommodate the structure would be minimal (disturbance would be no greater than one foot depth). Soils may be exposed during grading and trenching for utilities, the facility's concrete foundation, and retention ponds. To minimize disturbance, silt fences and storm water runoff best management practices would be utilized during construction (see *Section 4.2*).

FEMA initiated consultation with the NRCS on October 20, 2006, regarding potential impacts to prime and unique farmland as defined in 7 CFR 658.2(a). According to their reply on November 27, 2006, the site is prime and unique farmland. The next step in the evaluation was to determine the Farmland Conversion Impact Rating for the site. That rating was 189 (see Appendix B for NRCS' Farmland Conversion Impact Rating). However, based on the determination that the site's conversion would impact only 0.0099

percent of the prime farmland in the Parish, FEMA has determined that the impact would not be significant.

4.2 Water Resources and Water Quality

4.2.1 Surface Water and Groundwater

A visit to the original Peebles Elementary School site was conducted on August 21, 2006. There were no rivers, creeks, or other defined drainages on the original site. Peebles Coulee is located behind the eastern property line. Based on Louisiana maps, storm water runoff is estimated to follow surface topography and flow to the east into Peebles Coulee. Peebles Coulee flows west into the Southern Drainage Canal and then south into Weeks Bay.

A visit to the proposed site was conducted on August 21, 2006. There were no rivers, creeks, or other defined drainages on the proposed project site. There is a ditch that runs south of the proposed facility, along the frontage road. Given the flat nature of the site, it is possible that some runoff could discharge there. Based on topography, storm water runoff is estimated to flow to the west. The nearest water body is Jack's Coulee, which is approximately 2 miles west of the site (Site Engineering, Inc. 2006).

According to the environmental site assessment (Site Engineering, Inc. 2006), groundwater is shallow; typically located less than 10 feet below the ground surface in the project area. The shallow groundwater flow direction is expected to generally follow the local topography, flowing in a westerly direction toward Jack's Coulee. Note that flow direction may be affected by localized conditions such as ditches or coulees.

Alternative 1 - No Action: The No Action alternative would have no impacts on surface and groundwater resources.

Alternative 2 – Construction of a New Elementary School Relocating Peebles and Grand Marais Elementary Schools (Proposed Action): As stated under Section 3.2 of this EA, the School Board is considering two options for managing wastewater generated by the school. The first option, construction of a modular wastewater treatment plant and lift station on site, would result in the discharge of treated effluent from the wastewater treatment plant to the drainage ditch south of the proposed facility and north of the frontage road. If this ditch is connected to a surface water body (waters of the U.S.), then the facility would need a permit from LDEQ's water quality program under the Clean Water Act. The permit would likely set quantitative limits for parameters such as flow, pH, turbidity, and biochemical oxygen demand. These limits would be set so that water quality standards are not exceeded in the surface water body that the drainage ditch discharges to. Note that depending on the nature of the ditch (lined or unlined), the operation of the wastewater treatment plant has the potential to affect groundwater depth and flow.

The second option for managing wastewater involves the trenching and installation of 2,200 feet of piping to connect the school's wastewater system with the nearest municipal

wastewater treatment system (publicly owned treatment works, or POTW). If this option were chosen, the facility would need a permit or approval from the POTW that might set parameters to ensure that the POTW does not cause an upset to the system or does exceed parameters (flow, etc.) for its discharge to a surface water body.

Construction of the school also has the potential to increase the amount of sediment being discharged to the ditch due to storm water runoff. In addition, longer term impacts could result from the conversion of a portion of the site from natural surface to impermeable surface, lowering the opportunity for groundwater recharge. A storm water pollution prevention plan would be prepared and best management practices for storm water management would be implemented to minimize any detrimental effects to water quality during construction.

4.2.2 Wetlands

The USACE regulates the discharge of dredged or fill material into waters of the U.S., including wetlands, pursuant to Section 404 of the Clean Water Act. Wetlands are identified as those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support a prevalence of vegetation typically adapted for life in saturated soil conditions. The USACE also regulates the building of structures in waters of the U.S. pursuant to the Rivers and Harbors Act (RHA). In addition, Executive Order 11990, Protection of Wetlands, directs federal agencies to take actions to minimize the destruction, loss or degradation of wetlands and to preserve and enhance the values of wetlands on federal property.

No wetlands were observed during a visit to the proposed site conducted on August 21, 2006. According to the National Wetlands Inventory Map provided by the U.S. Fish & Wildlife Service (USFWS), there are no wetlands and/or other waters of the U.S. on or near the proposed project site, and an aerial photograph of the area confirms that observation.

Alternative 1 - No Action: The No Action alternative would have no effect on wetlands or other waters of the U.S. and would not require permits under Section 404 of the CWA or Section 10 of the RHA.

Alternative 2 – Construction of a New Elementary School Relocating Peebles and Grand Marais Elementary Schools (Proposed Action): Construction at the proposed project site would not destroy or modify wetlands, have an adverse effect on the natural values of wetlands, or directly or indirectly support new development on wetlands.

4.2.3 Floodplain

In compliance with FEMA policy implementing Executive Order 11988, Floodplain Management, the project was reviewed for possible impacts associated with occupancy or modification to a floodplain. Iberia Parish enrolled in the National Flood Insurance

Program (NFIP) on July 3, 1978. According to the Flood Insurance Rate Map (FIRM) Community Panel Number 2200780150C, the proposed project site is located within an area of minimal flooding.

Alternative 1 - No Action: The No Action alternative would not result in impacts to the 100-year floodplain.

Alternative 2 – Construction of a New Elementary School Relocating Peebles and Grand Marais Elementary Schools (Proposed Action): The proposed project site is not located within the 100-year floodplain. The new construction alternative would not result in short or long term effects associated with the occupancy of or modification to floodplains and direct or indirect support of floodplain development. Therefore, the proposed alternatives would be in compliance with Executive Order 11988, Floodplain Management.

4.3 Coastal Resources

Louisiana Department of Natural Resources (LDNR) regulates development in the designated coastal zone under the Coastal Zone Management Act (CZMA) of 1978. The Act established a system of Coastal Use Permits (CUPs) to regulate uses and activities in the coastal zone. These permits are required for those projects which have a direct impact on coastal waters.

The United States Fish and Wildlife Service (USFWS) regulates federal funding in Coastal Barrier Resource System (CBRS) Units under the Coastal Barriers Resource Act (CBRA). The Act protects undeveloped coastal barriers and related areas ("Otherwise Protected Areas") by prohibiting direct or indirect federal funding of projects in these areas that might support development. The purpose is to promote more appropriate use and conservation of coastal barriers along the Gulf of Mexico.

According to Louisiana Coastal Zone and CBRS maps, the proposed site is not located in the coastal zone or a CBRS. The original Peebles site is located in the coastal zone but is not part of a CBRS.

Alternative 1- No Action: The No Action alternative would have no effect on the coastal zone since the function of the facilities (elementary schools) does not have a direct impact on coastal waters. The No Action alternative would have no effect on the CBRS as regulated under CBRA.

Alternative 2 – Construction of a New Elementary School Relocating Peebles and Grand Marais Elementary Schools (Proposed Action): The proposed project site is not located within either the Louisiana Coastal Management Zone or the CBRS.

4.4 Biological Resources

4.4.1 Flora and Fauna

Visits to the proposed site were conducted on August 21, 2006, and March 5, 2007. The project site consists of approximately 15 acres of agricultural sugar cane and has not supported native vegetation for at least the past 70 years. Based on site visits and professional experience and knowledge, besides agricultural pests such as the sugar cane moth borer (*Diatraea saccharalis*), there are no animals dependent on sugar cane fields. Native and non-native animals such as reptiles, amphibians, mice and rats (Family Muridae), rabbits (*Sylvilagus* spp.), white tailed deer (*Odocoileus virginianus*) and many others that live in the area may wander in and out of the fields. A few mammals feed on sugar cane (sometimes becoming agricultural pests) [e.g. black bear (*Ursus americanus luteolus*), raccoon (*Procyon lotor*), and nutria (*Myocastor coypus*)], although it is not a main staple of any mammal's diet.

Alternative 1- No Action: The No Action alternative would have little effect on flora and fauna and no effect on them at the proposed site. If the existing Peebles site is left to stand vacant, there could be an increase in flora and fauna on that site. The Grand Marais site would continue to function as a school and as such there would be no change in flora and fauna there.

Alternative 2 – Construction of a New Elementary School Relocating Peebles and Grand Marais Elementary Schools (Proposed Action): Under the proposed action, 15 acres of sugarcane would be converted to a developed site and thus any animals that may have used the area would be affected. Since sugarcane fields are not important habitats for animals, there would be no significant impact to animal species. Since the flora consisted of sugarcane only, the impact would be the loss of yearly sugarcane production (s*ee Section 4.1*).

4.4.2 Threatened and Endangered Species

The Endangered Species Act (ESA) of 1973 prohibits the taking of all listed threatened and endangered species unless specifically authorized by permit from the United States Fish and Wildlife Service (USFWS) or the National Marine Fisheries Service. “Take” is defined as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect or attempt to engage in any such conduct." Harm is further defined by the ESA regulations to include significant habitat modification or degradation that results in death or injury to listed species by significantly impairing behavioral patterns such as breeding, feeding, or sheltering.

According to a summary list of federal threatened and endangered species from the USFWS, 10 threatened and endangered species occur in Iberia Parish. Six of them occur in the Gulf of Mexico off the Parish coast (e.g., sea turtles and Gulf sturgeon); the pallid sturgeon occurs within the Atchafalaya River and the brown pelican lives and nest in coastal areas. A population of the threatened Louisiana black bear (*Ursus americanus luteolus*) inhabits coastal Iberia Parish. Black bears are primarily associated with

forested wetlands; however, they utilize a variety of habitat types, including marsh, spoil banks, and upland forests. Bald eagles (*Haliaeetus leucocephalus*) typically nest in bald cypress trees near fresh to intermediate marshes or open water in southeastern parishes. In southwestern parishes (including Iberia Parish) they may winter and infrequently nest near large lakes.

Alternative 1- No Action: The No Action alternative would have no effect on federal threatened or endangered species.

Alternative 2 – Construction of a New Elementary School Relocating Peebles and Grand Marais Elementary Schools (Proposed Action): Site visits conducted on August 21, 2006, and March 5, 2007, did not indicate the presence of habitat suitable for the federal threatened and endangered species listed for Iberia Parish. Through electronic mail consultation with USFWS dated September 5, 2006, the proposed project would have no effect on Federal trust resources currently protected by the Endangered Species Act of 1973 (see *Appendix B*).

4.5 Cultural Resources

4.5.1 Historic Context

Archaeological evidence suggests humans arrived in Louisiana 12,000 years ago (Smith et al. 1983:127). Around 4,000 B.C. their nomadic life style underwent several changes; there were advances in tool and pottery technology, the first earthen mounds and embankments were built, and many groups adopted a more sedentary life style (Coughlin, et al., 2003:30-31).

Expeditions led by Hernando De Soto in the 1540s and Rene-Robert de La Salle in 1682 mark the beginning of the historic period in Louisiana. The French and Spanish were the first Europeans to colonize southern Louisiana (Coughlin, et al., 2003:39; Smith et al., 1983:235). Two Native American groups, the Attakapa and the Chitimacha, lived in the project area. The Attakapa lived in the area until the early 1800s. The Chitimacha remained in the area until they were moved to a reservation in 1881 (Kniffen et al. 1987:75). Cash crops such as indigo, sugar cane, and cotton were grown on small farms and plantations. The Acadians arrived in southern coastal Louisiana from Nova Scotia by circa 1765 and over time established numerous settlements in the area. After the Civil War the economy was again centered on sugar cane and other cash crops. The petroleum industry came to the area at the beginning of the twentieth century and continues to play a major role in the economy (Coughlin, et al., 2003:39-72).

4.5.2 Section 106 of the National Historic Preservation Act (NHPA)

Federal Emergency Management Agency funding for the construction of the proposed Peebles/Grand Marias Elementary School would either directly or indirectly involve three separate properties, under two different alternatives. FEMA's Section 106 responsibilities under these two alternatives are discussed below.

Alternative 1 - No Action: The No Action alternative would not affect cultural resources at either the original Peebles Elementary School, or the existing Grand Marais Elementary School, as discussed below.

The original Peebles Elementary School, Main 4915 Weeks Island Road, New Iberia, suffered floodwater and wind-related damage from Hurricane Rita on September 24, 2005. FEMA initiated Section 106 review of the Peebles Elementary School in accordance with the Programmatic Agreement in place among FEMA, the Louisiana State Historic Preservation Officer (SHPO), the Louisiana Office of Homeland Security and Emergency Preparedness (LOHSEP) and the Advisory Council on Historic Preservation (ACHP), dated December 3, 2004. FEMA determined that the Peebles Elementary School is not eligible for the National Register of Historic Places (National Register), and that no historic properties would be affected by the proposed project. The SHPO concurred with FEMA's determination of no historic properties on March 22, 2006 (*see Appendix B).*

The Grand Marias Elementary School, 3319 College Road, in Jeanerette, suffered wind damage resulting from Hurricane Rita on September 24, 2005. The property does not meet the 50-year criterion, nor does it possess the level of exceptional significance to be considered eligible for the National Register. Pursuant to 36 CFR Part 800.3(1), the proposed undertaking does not have the potential to cause effects to historic properties.

Alternative 2 - Construction of a New Elementary School Relocating Peebles and Grand Marais Elementary Schools (Proposed Action):

Pursuant to Section 106 and the Programmatic Agreement in effect, FEMA initiated consultation with the SHPO on May 4, 2006, for the proposed construction of the Peebles/Grand Marais Elementary School in Iberia Parish, Louisiana. The Area of Potential Effect (APE) for the proposed project is a 15-acre parcel of land located northwest of the intersection of US 90 and Darnell Road in Iberia Parish, Louisiana. FEMA performed a site visit of the APE, a records search for archaeological sites within 0.5 miles of the APE on file in the Louisiana Division of Archaeology, and a search in the database of the Louisiana Archives Index and National Register for Iberia Parish.

FEMA determined that no historic properties would be affected by the proposed project. The SHPO concurred with FEMA's determination of No Historic Properties Affected on May 4, 2006 (*see Appendix B).*

The School Board is considering one option for wastewater management for the school that would involve the trenching and installation of piping for 2,200 feet from the 15-acre proposed school site, along a right-of-way, to intersect with an existing municipal wastewater treatment system. The impact of the ground-disturbing activities on historic properties under this wastewater management option was not evaluated. If this wastewater treatment option were selected by the School Board, then additional archaeological clearance would be required before the project could proceed.

The following procedure applies to unanticipated archaeological discoveries. If during the course of construction, unanticipated archaeological artifacts (prehistoric or historic) or human remains are discovered, the applicant must immediately stop work within 100 feet of the discovery and take all reasonable measures to avoid and minimize harm to the finds. The applicant will inform their Public Assistance (PA) contacts at FEMA, who will in turn contact FEMA Historic Preservation staff. The applicant cannot proceed with work until FEMA Historic Preservation staff have completed consultation with the SHPO and Native American Tribal Representative, as appropriate. In addition, if unmarked graves are discovered, compliance with the Louisiana Unmarked Human Burial Sites Preservation Act (R.S. 8:671 et seq.) is required. The applicant must notify the law enforcement agency of the jurisdiction where the remains are located within twenty-four hours of the discovery. The applicant must also notify FEMA and the Louisiana Division of Archaeology by calling 225-342-8170 within seventy-two hours of the discovery. Work cannot begin within the area of discovery until the cultural affiliation of the remains and their ultimate disposition are determined in consultation with FEMA, SHPO, and Native American Tribal Representatives, and other interested parties.

4.5.3 Tribal Consultations

Tribal consultation has been initiated and should be completed before the EA is finalized.

4.6 Air Quality

The Clean Air Act (CAA) provides for federal protection of air quality by regulating air pollutant sources and setting emissions standards for certain air pollutants. Under the CAA, states adopt ambient air quality standards in order to protect the public from potentially harmful amounts of pollutants. The U.S. Environmental Protection Agency (EPA) has designated specific areas as National Ambient Air Quality Standards (NAAQS) attainment or non-attainment areas. Non-attainment areas are any areas that do not meet the quality standard for a pollutant and attainment areas meet ambient air quality standards. According to the EPA, Iberia Parish is an attainment area (EPA 2006).

Alternative 1- No Action: The No Action alternative would have no effect on air quality.

Alternative 2 – Construction of a New Elementary School Relocating Peebles and Grand Marais Elementary Schools (Proposed Action): Particulate emissions from the generation of fugitive dust during project construction would be increased temporarily in the immediate project area as a result of this alternative. Other emission sources on site would be diesel engines and other heavy construction equipment. These effects would be localized and of short duration.

To reduce potential short term effects to air quality from construction related activities, the contractor would be responsible for using best management practices to reduce fugitive dust generation and diesel emissions.

4.7 Noise

Noise is generally described as unwanted sound. The city of New Iberia local noise ordinance states that noise being generated industrially should not exceed 70 decibels (dB) on the A scale (A) between the hours of 7 a.m. and 10 p.m., where dB(A) is the band level that the total sound level of all noise is measured with a sound level meter using an A-weighting network. Additionally the noise being generated industrially should not exceed 65 dB (A) between the hours of 10 p.m. and 7 a.m. The only existing significant ambient noise source in the area is US 90. Sporadic noise sources are associated with sugarcane production and harvesting (i.e. tractors and other heavy equipment). The nearest large industry is Iberia Port, over 3 miles away.

Alternative 1 - No Action: The No Action alternative would have no effect on noise in the associated areas.

Alternative 2 – Construction of a New Elementary School Relocating Peebles and Grand Marais Elementary Schools (Proposed Action): Construction of the new facilities would result in a slight increase in noise as a result of construction equipment and vehicular activity. There are no noise sensitive receptors (i.e. hospitals, schools, churches) in or adjacent to the project area. Although the proposed action would result in increased noise during construction, the noise is expected to be minor and short term. The contractor would be required to follow the local noise ordinances for New Iberia as stated above.

4.8 Traffic

The proposed site is located along a frontage road that parallels US 90, where the speed limits on the highway are at 65 mph. This highway is designated to be the future corridor of Interstate 49, although there is no time frame for the change.

Alternative 1- No Action: The No Action alternative would have no effect on traffic. Although traffic increased at each of the schools when they accepted the displaced students from Peebles Elementary, the number of additional buses or cars of parents dropping off children is not significant.

Alternative 2 – Construction of a New Elementary School Relocating Peebles and Grand Marais Elementary Schools (Proposed Action): Construction at the proposed project site would have a temporary effect on traffic by increasing the number of heavy machinery vehicles on US 90 and the frontage road. Construction traffic would be closely monitored and controlled as appropriate. All construction activities would be conducted in a safe manner in accordance with Occupational Safety and Health Act (OSHA) requirements.

There would be a slight permanent increase in traffic on the frontage road. The expected number of vehicles coming to and from the new facility would be six to eight buses and approximately 150 carpoolers. There would be approximately 30 staff drivers who would use the surrounding roadway. The increase in traffic is not expected to overwhelm

the road systems. The frontage road is a relatively lightly traveled thoroughfare, removed from the heavily traveled and high speed US 90. Also, due to the school's location near the underpass for US 90 and John Darnell Road, it would allow bus operators serving the school or parents to cross US 90 at a controlled access point rather than unprotected intersections. Other underpass crossings are available further to the east and west for parents traveling from other areas. There would be a beneficial effect when US 90 becomes I-49 because there would be no unprotected crossings and all traffic would be required to use controlled access points.

4.9 Safety

The safety issues that were considered in this draft EA include the health and safety of area residents, the public at-large, the students and staff that would attend the new school, and the protection of personnel involved in activities related to the implementation of the proposed project.

The current location of Peebles Elementary School on Weeks Island Road (SR 83) in New Iberia is just east of the Port of Iberia. The Port has experienced substantial growth in recent years, with repeated expansion to the east, placing it ever closer to the school. This proximity has raised potential safety concerns for students. Currently, numerous activities of the Port, including a new ship channel just across the highway, are changing the land use of the immediate vicinity of the school from a relatively quiet residential/ light commercial area to a busy industrial complex. On at least two occasions, incidents at the Port or vehicle accidents involving toxic or hazardous materials has caused the school campus to be evacuated and temporarily closed due to fears of contamination or toxic fumes.

The proposed site for the new elementary school was historically used as sugarcane cropland. The site is also surrounded on three sides (north, west and east) by additional planted sugarcane. South of the site is the US 90 service road, then US 90, across from which is mixed agricultural, commercial and residential development.

The sugarcane planted in the fields surrounding the proposed school site is mechanically harvested and therefore, is not burned. Fertilizer that is typically used for sugarcane crop includes nitrogen, phosphorus, and potassium. Fertilizer is generally applied in the planting furrow by hand or machine. Pesticides are typically only used to correct a problem, and is applied by hand or machine in a manner that avoids drift of insecticide to nearby dwellings, gardens, wildlife habitats, bee colonies, crops or livestock.

Alternative 1 - No Action: The proximity of the original school site to the port has raised potential safety concerns for students. As mentioned previously, there have been at least two incidents at the Port or vehicle accidents where a release of toxic or hazardous materials has caused the school campus to be evacuated and temporarily closed due to fears of contamination or toxic fumes.

Alternative 2 – Construction of a New Elementary School Relocating Peebles and Grand Marais Elementary Schools (Proposed Action): The proximity of the proposed new school site to active sugarcane fields raised concerns about exposure to burning fields, fertilizer, and pesticides. However, since the crop is mechanically harvested, the fields are not burned. Additionally, the fertilizer and pesticides are applied by hand or machine. Therefore, there is minimal potential for exposure to smoke, fertilizers, or pesticides. To protect students from US 90, agricultural processing, and any future business/industry that may move into the area, a chain link fence would be installed around the 15 acre property on property lines. The kitchen service area would also be separated by chain link fence (s*ee Figure 3*).

4.10 Hazardous Materials

The management of hazardous materials is regulated under various federal and state environmental and transportation laws and regulations, including the Resource Conservation and Recovery Act (RCRA); the Comprehensive Environmental Response, Compensation, and Liability Act; the Emergency Response 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 that have already been contaminated by releases of hazardous materials, wastes, or substances.

This section describes the potential for prior releases of hazardous materials to the environment on the proposed site or close enough to the proposed site to have affected its surface soils or subsurface media (soils and groundwater). This EA also evaluates the potential for the proposed project to use hazardous materials, generate hazardous wastes, and release hazardous substances.

There were no obvious existing or potential hazardous materials, substances, or conditions at the project site, based on site observations and the 2006 Environmental Site Assessment. A database search prepared for the environmental site assessment for the proposed project site revealed that there are no Louisiana Volunteer Remedial Program (VRP) or Brownfield sites located within 0.5 mile of the proposed site. No sites of concern were found during a review of other hazardous waste management and disposal, solid waste disposal, storage tank, enforcement, and other databases for various distances from the site. There are no recorded oil and gas wells on the proposed property, and the nearest recorded well site is 0.3 mile away.

Alternative 1- No Action: The No Action alternative would not disturb any hazardous materials or create any potential hazard to human health.

Alternative 2 – Construction of a New Elementary School Relocating Peebles and Grand Marais Elementary Schools (Proposed Action): The environmental site assessment (Site

Engineering, Inc. 2006) and project observations indicate that no hazardous materials, wastes, or substances (including contaminated soil or groundwater) appear to be present at the proposed site. If hazardous constituents are unexpectedly encountered in the project area during the proposed construction operations, appropriate measures for the proper assessment, remediation and management of the contamination would be initiated in accordance with applicable federal, state, and local regulations.

Project construction will involve the use of hazardous materials (e.g., petroleum products, cement, caustics, acids, solvents, paint, electronic components, pesticides/herbicides and fertilizers, treated timber) and may result in the generation of small volumes of hazardous wastes. Appropriate measures to prevent, minimize, and control spills of hazardous materials must be taken, and any hazardous and non-hazardous wastes generated must be disposed of in accordance with applicable federal, state, and local requirements.

4.11 Socioeconomics and Land Use

According to the Iberia Parish Government (online webpage), in the last quarter century, Iberia Parish population has grown by 25 percent (from 57,397 in 1970 to 71,685 in 1997, with the largest increase between 1990 and 1997). The U.S. Census of 2000 noted that the Parish population was 72,773. Since 1987, the total employed population in Iberia Parish has increased by 32 percent, and in the same time period the unemployment rate declined from 23.5 percent to 4.5 percent. The Iberia Parish economic base is comprised of agriculture, food processing, oil field services, medical care, construction industries, and a variety of other businesses. In 2001, Iberia Parish was the leading sugarcane-producing parish in Louisiana with 1,710,000 net tons of sugarcane produced.

The trend toward growth is reflected in housing development around the proposed new school site area. The East Side subdivision, within a few miles east of the proposed site, has been developed within the last two years; it currently has 25 houses. There are several other subdivisions in a 5-mile radius of the proposed site, which are expanding or just breaking ground.

Alternative 1- No Action: The No Action alternative may have an adverse effect on socioeconomic conditions in the area. The inability of the school system to accept the growing number of students and displaced students currently attending from New Orleans schools could negatively impact the growth reflected in increasing housing developments in the area.

Alternative 2 – Construction of a New Elementary School Relocating Peebles and Grand Marais Elementary Schools (Proposed Action): Construction of the new school would facilitate and support population growth and in turn economic growth by the increase in capacity of the new school and the furnishing of a new facility. Usually the advent of new schools tends to attract people to an area. In this case it appears that the increasing population has necessitated a new school with an anticipatory capacity for future students. The parish also anticipates that students who were displaced from New Orleans

and are attending the existing schools will stay in Iberia Parish and continue to attend school in this zone.

Construction of the new school could have an adverse effect on sugarcane production in the area. Besides the removal of 15 acres of prime and unique farmland, the surrounding sugarcane producing land could be subject to housing development pressures (s*ee Section 4.1)*.

4.12 Environmental Justice

Executive Order 12898, entitled "Federal Action to Address Environmental Justice in Minority Populations and Low- Income Populations," mandates that federal agencies identify and address, as appropriate, disproportionately high and adverse human health or environmental effects of programs on minority and low-income populations.

According to the 2000 U.S. Census, 65.1 percent of the population of Iberia Parish is white, 30.8 percent is African American, and 1.9 percent is Asian. The median family income in 1999 was $36,017, and 20.2 percent of families are below poverty level.

Alternative 1- No Action: The No Action alternative may have an adverse or disproportionate impact on minority or low-income populations. Fourth through sixth grade students displaced from Peebles Elementary School are traveling an average of 5 to 10 miles more to get to Belle Place School, which is outside the Peebles School attendance zone.

Alternative 2 – Construction of a New Elementary School Relocating Peebles and Grand Marais Elementary Schools (Proposed Action): Construction of the new Peebles Elementary School would not have adverse or disproportionate impacts on low-income or minority populations. It is a public facility open to all residents living in the attendance zone.

5.0 CUMULATIVE IMPACTS

Cumulative impacts are those effects on the environment that result from the incremental effect of the action when added to past, present, and reasonably foreseeable future actions, regardless of what agency (federal or nonfederal) or person undertakes such other actions. Cumulative effects can result from individually minor but collectively significant actions taking place over a period of time. There are no other known projects that, when added to the proposed project, would be expected to have a cumulative impact on the human and natural environment.

6.0 CONDITIONS AND MITIGATION MEASURES

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

- If the wastewater treatment option involving 2,200 feet of trenching and pipe-laying were selected by the School Board, additional archaeological clearance would be required before the project could proceed, because this area was not included in the original Area of Potential Effect (APE) reviewed by FEMA and SHPO.
- If the wastewater option involving 2,200 feet of piping to connect to the local municipal wastewater treatment system were chosen, a permit would be required from the local wastewater treatment plant system for discharge to its system would be required.
- If the wastewater option for construction of a wastewater treatment plant and pump station were chosen, then a permit would be required from the Louisiana Department of Environmental Quality before discharge of effluent from the onsite plant to the ditch. This permit would set parameters such as flow, pH, and conventional pollutants that would need to be met, and periodic reporting of these parameters would be required.
- If during the course of construction, unanticipated archaeological artifacts (prehistoric or historic) or human remains are discovered, the applicant must follow the procedures set forth in Section 4.5.2 of this document.
- Hazardous materials used in construction of the new facility must be managed (stored, used, transported, and disposed of) in accordance with federal, state, and local hazardous waste, hazardous material, and hazardous substance requirements. If hazardous substances are released to the project area during construction, these federal, state, and local requirements must be followed in response and cleanup.

7.0 PUBLIC INVOLVEMENT

The proposed project was discussed during regularly scheduled Iberia Parish School Board meetings held on the following dates: April 5, 2006; May 24, 2006; and July 12, 2006. Additionally, two public meetings were held on March 28, 2006 and April 4, 2006 to seek public input on the Board's intention to relocate Peebles and Grand Marais Elementary Schools and to purchase the Darnell Road property, respectively.

FEMA is inviting the public to comment on the proposed action during a 15-day comment period. A public notice has been published in the local newspaper, *The Daily Iberian*, announcing the availability of this draft EA for review at the Iberia Parish Library and the Iberia Parish School Board building in New Iberia. A copy of the Public Notice is attached in Appendix C.

If no substantive comments are received during the comment period, the draft EA and FONSI will become final and the initial Public Notice will also serve as the final Public Notice. If substantive comments are received, they will be addressed as appropriate in the Final EA and FONSI.

8.0 AGENCY COORDINATION

As part of the development of early interagency coordination related to the proposed action (i.e. construction of a new elementary school in a new, undeveloped location), state and federal resource protection agencies were contacted. These agencies included State Historic Preservation Officer, US Fish and Wildlife Service, Natural Resources Conservation Service, and the Governor's Office of Homeland Security and Emergency Preparedness.

9.0 CONCLUSION

Based upon the studies and consultations undertaken in this draft EA, and given the precautionary and mitigating measures, there do not appear to be any significant environmental impacts associated with the construction of a new elementary school in the proposed location.

10.0 LIST OF PREPARERS

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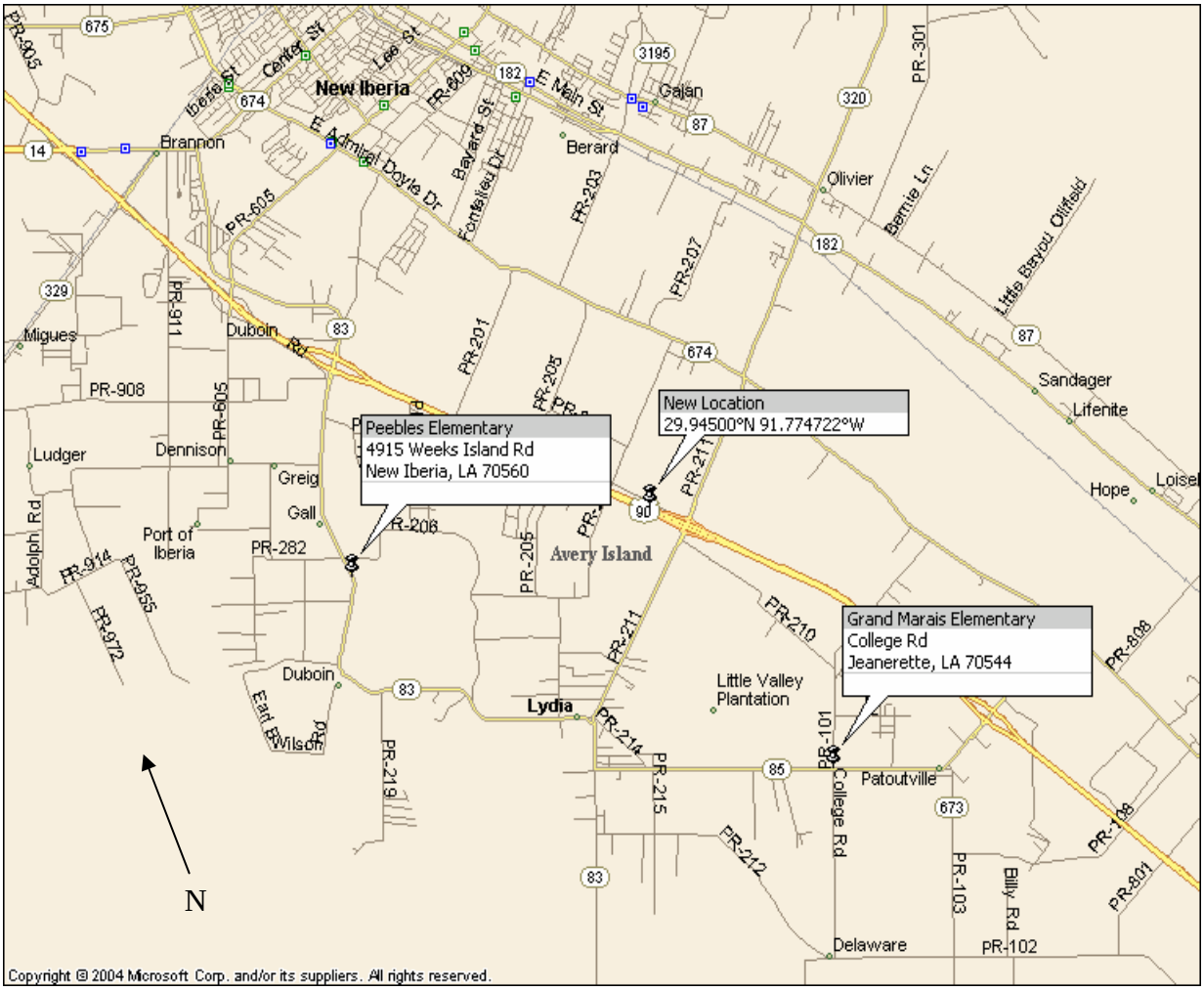

Figure 1: Peebles Elementary, Grand Marais Elementary, Proposed New Location, Iberia Parish, Louisiana (Unincorporated Areas)

Federal Emergency Management Agency

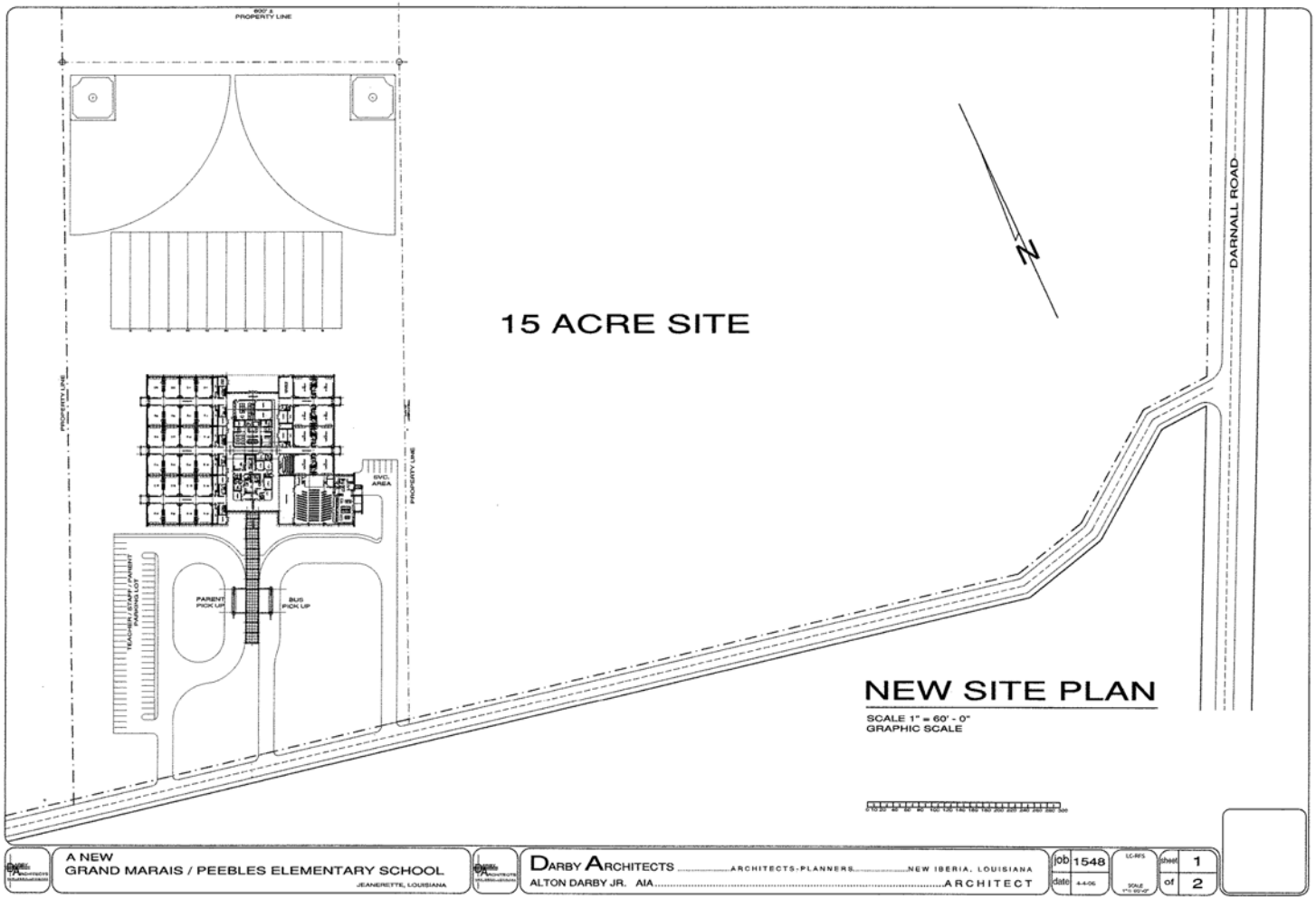

Figure 2: Proposed New Site Plan

Federal Emergency Management Agency

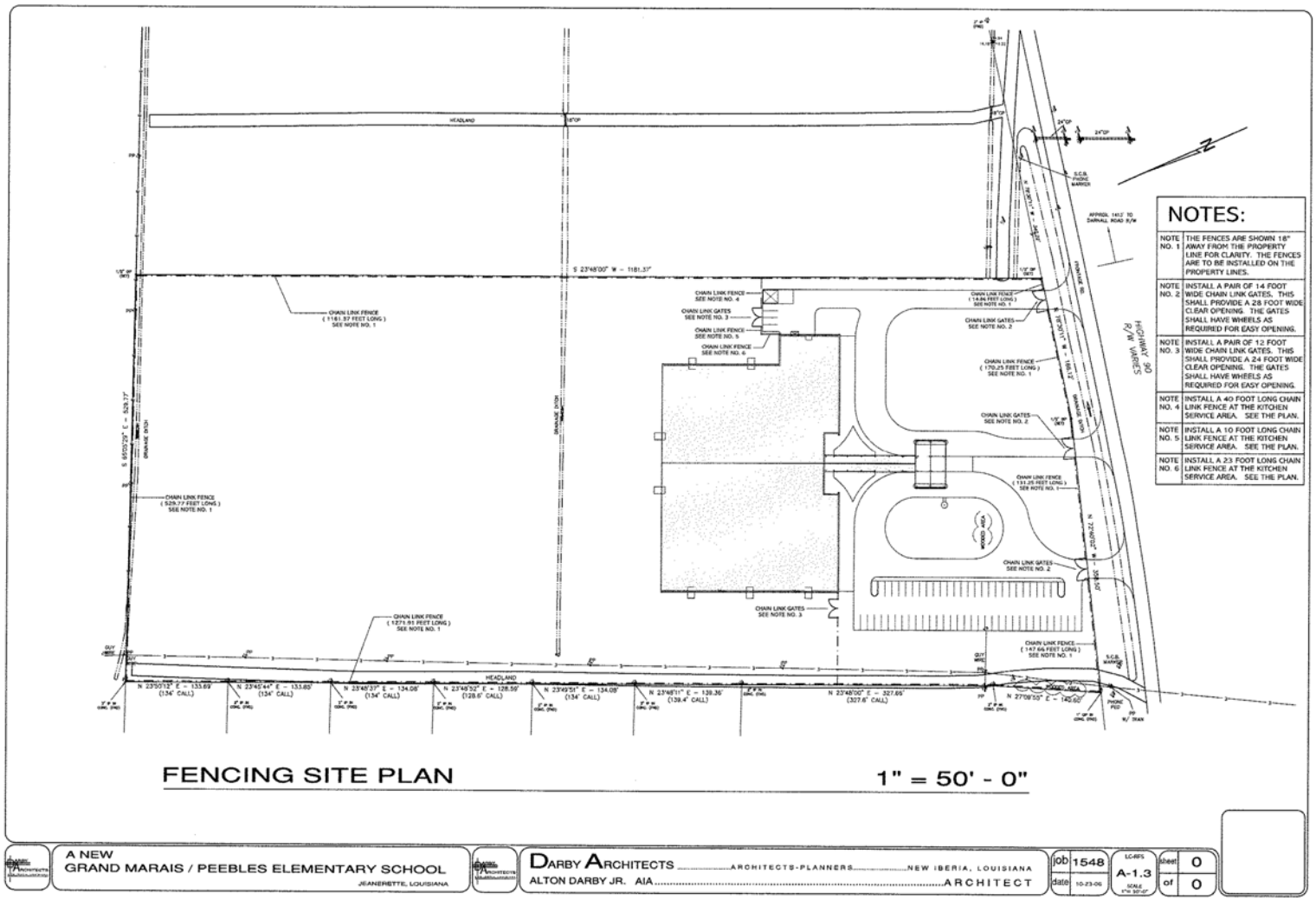

Figure 3: Proposed Fencing Plan

Federal Emergency Management Agency

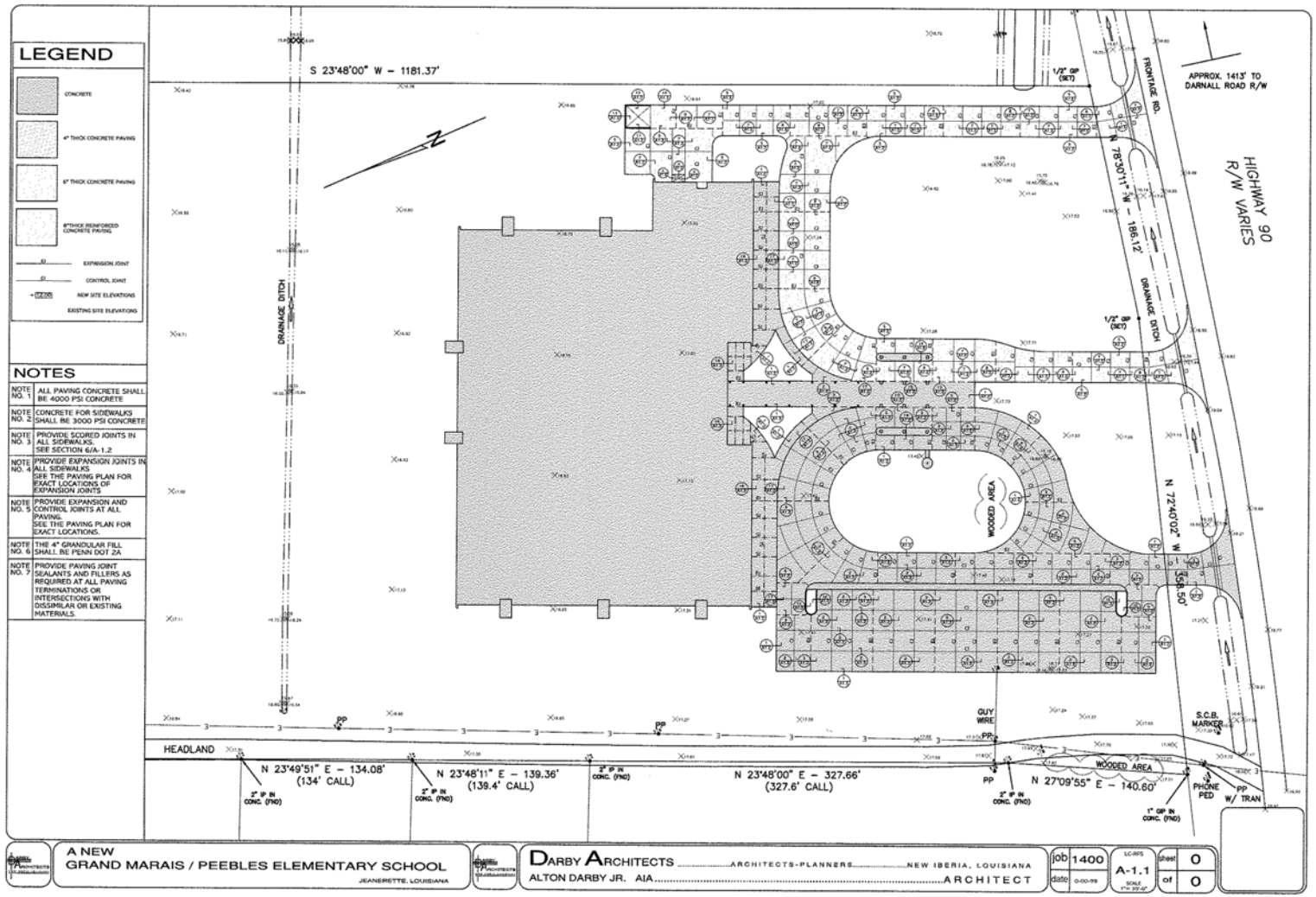

Figure 4: Proposed New Site Layout

Federal Emergency Management Agency

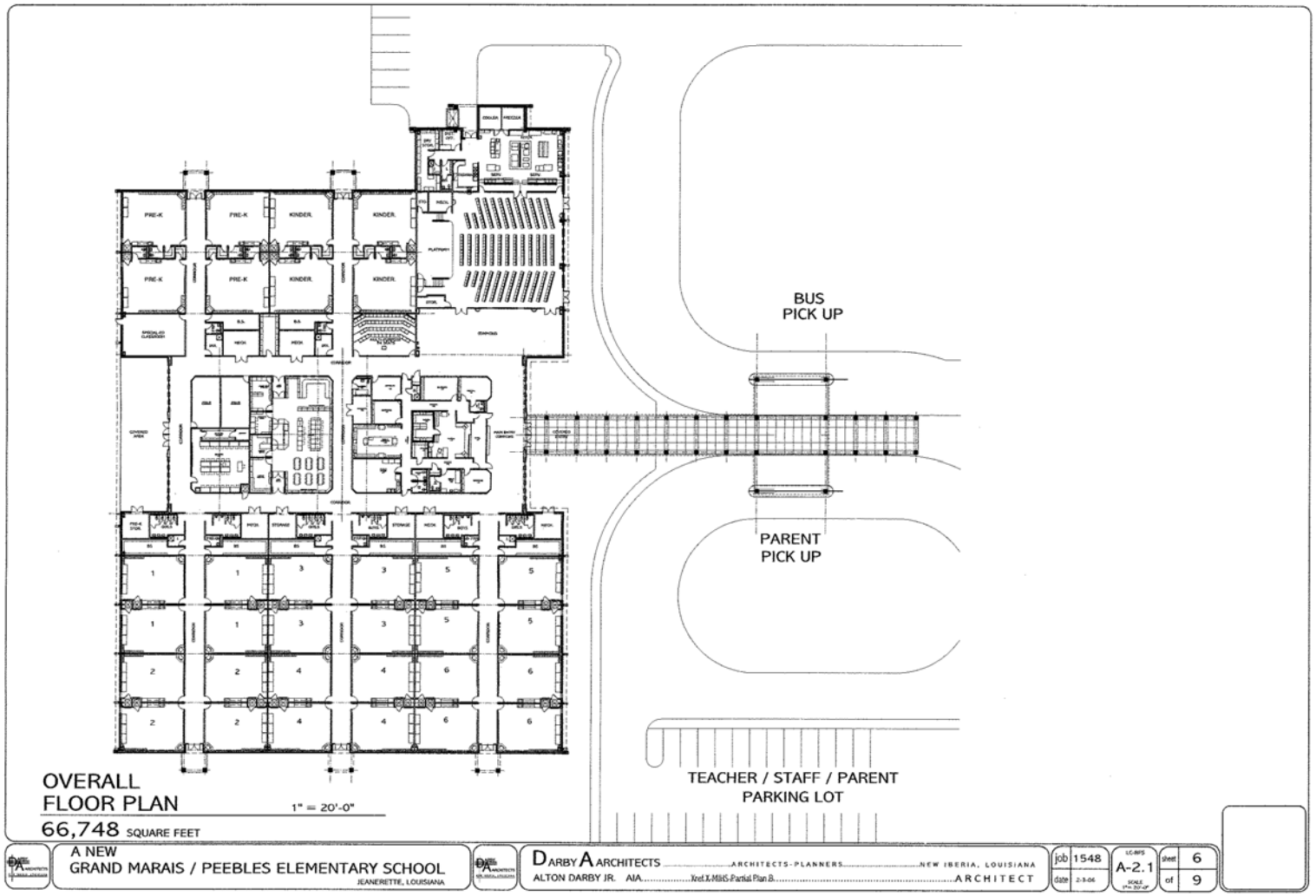

Figure 5: Proposed New School Floor Plan

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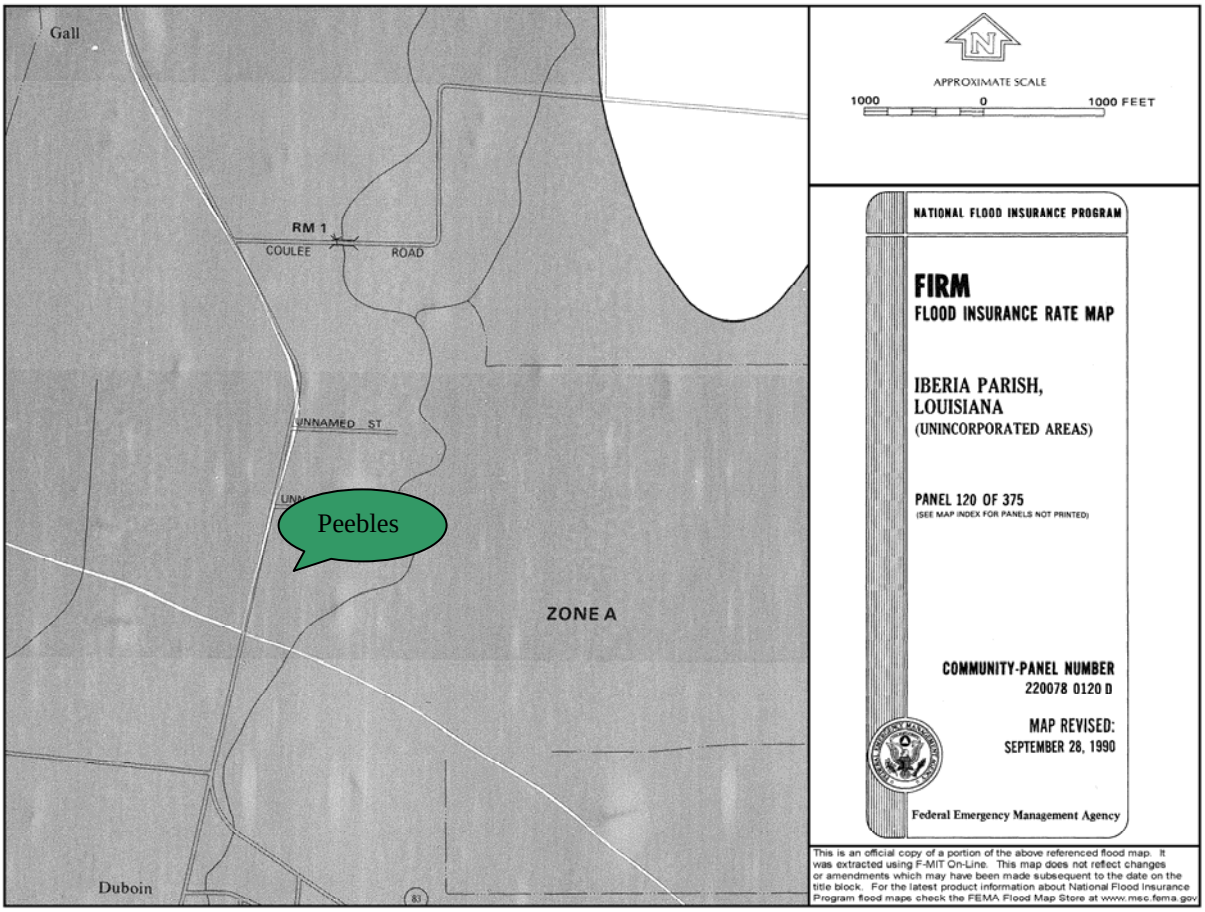

Figure 6: Flood Insurance Rate Map for Original School Site (Community-Panel Number 2200780120D, Iberia Parish, Louisiana (Unincorporated Areas))

Federal Emergency Management Agency

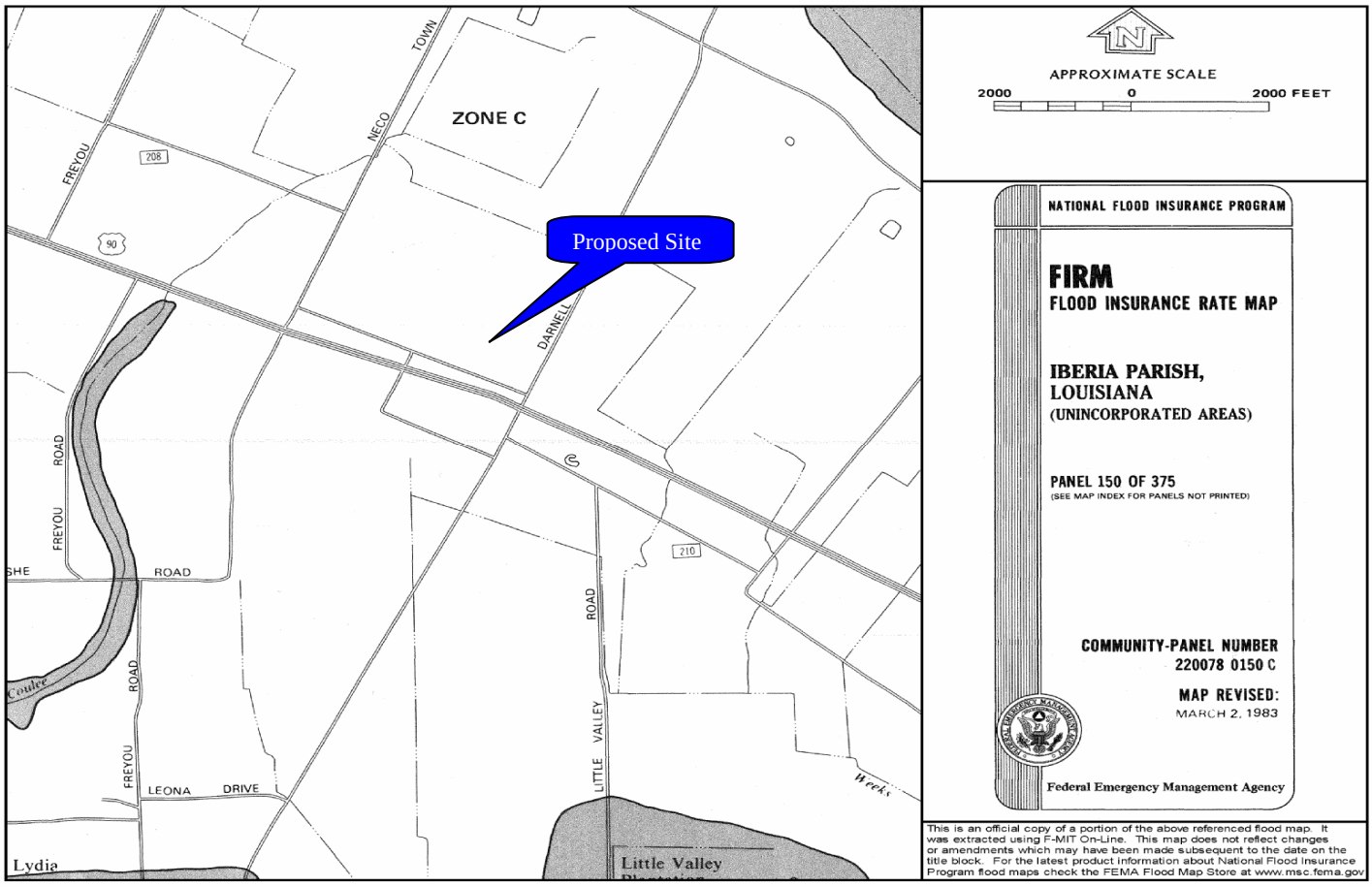

Figure 7: Flood Insurance Rate Map for Proposed School Site (Community-Panel Number 2200780120D, Iberia Parish, Louisiana (Unincorporated Areas))

Federal Emergency Management Agency

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