

Environmental Assessment

Henry Fire Station Relocation

Vermilion Parish, Louisiana

FEMA-1607-DR-LA

August 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
APE	Area of Potential Effect
BMP	Best Management Practices
CAA	Clean Air Act
CBRA	Coastal Barrier Resources Act
CBRS	Coastal Barrier Resources System
CUP	Coastal Use Permit
CWA	Clean Water Act
CZMA	Coastal Zone Management Act
EA	Environmental Assessment
EDMS	Electronic Document Management System
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
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act
NOAA	National Oceanic & Atmospheric Administration
NRHP	National Register of Historic Places
NRCS	Natural Resources Conservation Service
OSHA	Occupational Safety and Health Act
PA	Public Assistance
RCRA	Resource Conservation and Recovery Act
RHA	Rivers and Harbors Act
SHPO	State Historic Preservation Office/Officer
US	United States
USACE	United States Army Corps of Engineers
USDA	United States Department of Agriculture
USFWS	United States Fish and Wildlife Service
VRP	Volunteer Remedial Program
WSRA	Wild and Scenic Rivers Act

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**ENVIRONMENTAL ASSESSMENT
FOR
HENRY FIRE STATION RELOCATION
VERMILION 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 an existing fire station 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

On September 24, 2005, the tidal surge from Hurricane Rita resulted in extensive damage to the Vermilion Parish Henry Fire Station (District 15), located at 6124 State Road 330 in Erath, Louisiana. The fire station is owned by the Vermillion Parish Police Jury. It consists of a pre-engineered steel building (48 feet x 62 feet) with three (3) fire apparatus bays, equipment storage, restrooms, kitchen, meeting room, and other finished space totaling 960 square feet. Brackish water inundated the building and did not recede for more than twenty-four (24) hours, resulting in interior and exterior damages to: pre-finished plywood and crown molding, walls, plumbing and fixtures, electrical receptacles, floors, contents, insulation, paneling, a central AC unit, an electric breaker box, a propane tank supply line, a flagpole, a septic tank, and a water well building (plywood, electric components, and storage tank for water well). This fire station is currently being used to house three (3) fire trucks as the remainder of the station is inoperable. As a result, firefighting equipment is stored at the volunteer firefighter's

residences. This arrangement causes delays in firefighter's responses to local emergencies, thereby reducing fire protection for District 15.

2.0 PURPOSE AND NEED

Due to the intense tidal surge from Hurricane Rita, fire protection operations performed by the Vermillion Parish Henry Fire Station (District 15) were interrupted. The fire station was inundated with approximately six (6) feet of brackish water, which did not recede for over twenty-four (24) hours. The purpose of the proposed action is to allow Vermilion Parish Henry Fire Station (District 15) to provide effective fire protection services for the population it serves. The Vermilion Parish Police Jury has determined that a new facility, with upgrades to current codes and standards of enforcement requirements, is necessary, to replace the existing Henry Fire Station.

3.0 ALTERNATIVES

3.1 Alternative 1 - No Action

Under this alternative, the Vermilion Parish Police Jury would not replace or repair the Henry Fire Station and the equipment would continue to be stored at volunteer firefighter's residences. Consequently, District 15 would be without a serviceable facility thereby leaving the population served without adequate fire protection.

3.2 Alternative 2 – Construction of a New Fire Station Relocating Henry Fire Station (Proposed Action)

Vermilion Parish has prepared and submitted an application to FEMA for funding under FEMA's Public Assistance Program being administered in response to FEMA-1607-DR-LA. The applicant proposes to demolish the existing fire station, and to construct a new fire station, to provide fire protection services for District 15.

The proposed project location is on a parcel currently owned by the Vermilion Parish School Board. This parcel covers an area of approximately one (1) and one half (1/2) acres located in the northwest quadrant of the intersection Frank Road and Louisiana State Highway 331, in Erath, Louisiana, in Vermilion Parish. The parcel consists of a flat field, covered in ornamental grasses, with no trees. The site is currently not in use. The land immediately north of the project site is dominated by residential dwellings. Frank Road runs east and west along the southernmost edge of the subject property. Immediately south of Frank Road are mixed areas of residential and agricultural development. Louisiana State Highway 331 runs north and south along the eastern most edge of the project site. The eastern side of the Louisiana Highway 331, across from the project site, is dominated by residential development. Several commercial oil and gas production facilities exist approximately one (1) mile southwest from the project site. The proposed location is approximately three (3) miles north from the existing Henry Fire Station location (*see Figures 1 and 2*) (*see Appendix A*).

The proposed action includes the construction of a new one-story structure with three (3) fire apparatus bays, equipment storages, restrooms, a kitchen, meeting room, and other finished space totaling 960 square feet, as well as installation of appurtenant structures to include a driveway, access culvert, utilities, and a sewage treatment plant. The total building area for the proposed new facility is 3,523 square feet.

Site preparation will consist of on site excavation and deposition of, approximately 4,445 cubic yards of native earthen material to elevate the building pad to an elevation of 14.00 linear feet above mean sea level. The existing ground elevation is approximately 8.0 feet above mean sea level. Building construction will require excavation for footings and the installation of utilities with site grading for drainage. The entire site will be graded to prevent ponding of water on the site, and to achieve positive drainage run off. Utilities such as electrical, water, telephone and cable television are available at the site in public rights of way. Approximately 80 linear feet of trenching will be conducted to connect the proposed site utilities to existing utility corridors. Sewage treatment will require installation of a below grade, limited use, mechanical treatment plant (on site); this will be installed by excavating eight (8) cubic square yards of native earthen material. (*see Figures 3 and 4*).

3.3 Alternative Eliminated From Further Consideration

One alternative considered was the demolition and reconstruction of the existing Henry Fire Station to its pre-disaster location, function and capacity. Elevation to the Advisory Base Flood Elevation (ABFE) would be required as a condition of the reconstruction.

The alternative of rebuilding the fire station at its pre-storm location is not considered a viable alternative to be carried forward. The current location of Henry Fire Station on State Road 330 in Erath is approximately twelve (12) miles directly north of Vermilion Bay. During Hurricane Rita, the station was inundated with approximately six (6) feet of brackish water from Vermilion Bay and was heavily damaged. Henry Fire Station provides emergency services to the District 15 population. In the event of another similar disaster, the District 15 would be without a passable facility thus leaving the population served without adequate fire protection. The Vermilion Parish Police Jury has determined that the Henry Fire Station should be relocated to higher ground, and farther away from Vermilion Bay.

Because there is a more feasible alternative to rebuilding the fire station at the pre-disaster site, which is in close proximity to Vermilion Bay, this alternative is not considered practicable and will not be studied in detail in the EA.

4.0 AFFECTED ENVIRONMENT AND IMPACTS

4.1 Geology and Soils

The proposed site is a parcel measuring one (1) and one half (1/2) acres in Vermilion Parish, in the Town of Erath. The geology of the proposed location predominantly consists of Pleistocene terraces. These consist of sand, gravel, and mud, but underlie

raised, flat surfaces with varying degrees of tilt and dissection depending on their relative ages (<http://www.lgs.lsu.edu>).

The topography of the area is generally flat. According to the United States Department of Agriculture (USDA), National Resources Conservation Service (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. All areas of this soil in Vermilion Parish are classified as prime farmland by NRCS.

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 NRCS regarding impacts to prime and unique farmland, and farmland of statewide importance.

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 Fire Station Relocating Henry Fire Station (Proposed Action): Under Alternative 2, the construction of the new fire station would affect soils, primarily as part of site preparation and building construction. Soils will be exposed during excavation of the pond, grading and trenching for utilities. Additionally, installation of the proposed structures would result in the compaction of all underlying soil. Soil compaction generally causes a reduction in the amount of moisture and organic material present in the soil. To minimize disturbance, silt fences and storm water runoff Best Management Practices (BMP) would be utilized during construction (see *Section 4.2*).

FEMA initiated consultation with the NRCS on May 2, 2007, regarding potential impacts to prime and unique farmland as defined in 7 CFR 658.2(a). According to their reply on July 11, 2007, 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 142 (see Appendix B for NRCS' Farmland Conversion Impact Rating). According to 7 CFR § 658.4, sites receiving a total score of less than 160 need not be given further consideration for protection.

After consultation and full consideration of potential impacts, it was determined that implantation of the proposed work would result in impacts that, while long-tem in duration, would likely be minimal, and localized.

4.2 Water Resources and Water Quality

4.2.1 Surface Water and Groundwater

An inspection of the proposed site was conducted on April 19, 2007. No rivers, creeks, or other defined drainages were observed on the proposed project site. Roadside ditches exist along Frank Road, bisecting the proposed fire station access drive and east of the proposed facility, along Louisiana Highway 331. An unnamed tributary of Boston Canal lies approximately 0.1 miles northwest from the proposed site, and runs in an arc, that extends from due north of the project site, to due west. Based on available topographic maps, storm water runoff appears to follow surface topography and flow southwest from the proposed site into Boston Canal, via the existing drainage ditch along the northern side of Frank Road. Boston Canal flows south emptying into Vermilion Bay.

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

Alternative 2 Construction of a New Fire Station Relocating Henry Fire Station (Proposed Action): As stated under Section 3.2 of this EA, the Vermilion Parish Police Jury is considering using a below grade limited use mechanical treatment plant for managing wastewater generated by the fire station. This will be installed by excavating eight (8) cubic square yards. Construction and utilization of a mechanical treatment plant on site would result in the discharge of treated effluent from the wastewater treatment plant to the existing drainage ditch south of the proposed facility, along Frank Road, adjacent to the proposed fire station access drive. If this ditch is connected to a surface water body (waters of the United States (U.S.)), then the facility will need a permit or other authorization from Louisiana Department of Environmental Quality's (LDEQ) water quality program under Section 401 of the Clean Water Act (CWA). Such a permit would likely set quantitative limits for parameters such as flow, pH, turbidity, and biochemical oxygen demand. These limits would be set such that water quality standards would not be exceeded in receiving waters.

Construction of the fire station is also likely to result in a temporary increase in soil erosion, and subsequent sediment increases in turbidity in the receiving ditch, due to storm water runoff. A storm water pollution prevention plan should be prepared, and BMP's for storm water management should be implemented to minimize any detrimental effects to water quality during construction. Assuming that these mitigation measures are adhered to, impacts to local water quality are expected to be minor, localized and short-term in duration.

4.2.2 Wetlands

The United States Army Corps of Engineers (USACE) regulates the discharge of dredged or fill material into waters of the U.S., including wetlands, pursuant to Section 404 of the CWA. 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.

Review of aerial photographs of the proposed site, along with a site visit on April 19, 2007, did not reveal the presence of wetlands. According to the National Wetlands Inventory Map provided by the United States Fish & Wildlife Service (USFWS) (<http://wetlandsfws.er.usgs.gov/wtlnds/launch.html>), there are no wetlands and/or other waters of the U.S. on or near the proposed project site. In a letter dated July 20, 2007, USACE stated that the proposed project site is not a wetland subject to USACE jurisdiction, and that no federal permit would be required for the placement of dredged or fill material on the project site. (*see Appendix B*).

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 Fire Station Relocating Henry Fire Station (Proposed Action): Construction at the proposed project site would not destroy wetlands, have an adverse effect on the natural values of wetlands, or directly or indirectly support new development on wetlands. A Department of the Army permit under Section 404 of the CWA and RHA will not be required for the deposition or redistribution of dredged or fill material on this site.

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. The Town of Erath enrolled in the National Flood Insurance Program (NFIP) on April 4, 1983. According to the Flood Insurance Rate Map (FIRM) Community Panel Number 2202210300D, the proposed project site is located within the 100-year floodplain.

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

Alternative 2 – Construction of a New Fire Station Relocating Henry Fire Station (Proposed Action): The proposed project would be built in zone "A13", and should be coordinated with the local floodplain administrator regarding floodplain permit(s). Elevations should be in compliance with Adjusted Base Flood Elevation maps dated March 2006, which designate the project site as ABFE Zone AE EL 13 (Map LA - AA 60). Elevation information, signed and sealed by a licensed surveyor, engineer, or architect should be obtained and filed for verification of compliance. All permits and certificates, and all coordination pertaining to these permit(s), should be documented and

provided to the local floodplain administrator, to Louisiana Governor's Office of Homeland Security and Emergency Preparedness (LA GOHSEP) and to FEMA as part of the permanent project file. To comply with Executive Order 11988, Floodplain Management, FEMA is required to follow the procedure outlined in 44 CFR Part 9 to assure that alternatives to the proposed action have been considered. This process, also known as the "Eight Step Planning Process," has been completed (*see Appendix C*).

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 1972. 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.

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 LDNR Coastal Zone and CBRS maps, the proposed site is not located in the Louisiana Coastal Zone or any CBR Unit.

Alternative 1- No Action: The No Action alternative would have no effect on the coastal zone since the function of the facilities (fire station) 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 Fire Station Relocating Henry Fire Station (Proposed Action): The proposed project site is not located within a CBRS. The applicant initiated consultation with LDNR to determine consistency with CZMA. According to LDNR's response dated May 18, 2007 this project is outside the Louisiana Coastal Zone (*see Appendix B*).

4.4 Biological Resources

4.4.1 Flora and Fauna

An inspection of the proposed site was conducted on April 19, 2007. There was no vegetation on the project site. Typical fauna in this area include White-tailed Deer (*Odocoileus Virginianus*), Eastern Cottontail Rabbit (*Sylvilagus Floridanus*), Common Raccoon (*Procyon Lotor*), Eastern Gray Squirrel (*Spermophilus Carolinensis*), and various non-endangered snake species.

Alternative 1- No Action: The No Action alternative would have no effect on flora or fauna.

Alternative 2 – Construction of a New Fire Station Relocating Henry Fire Station (Proposed Action): The construction of a new fire station would not result in clearing of woody vegetation or disturbance of any wildlife species in the immediate area. In general, the effects to plants and animals are expected to be minimal, short-term, and localized.

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 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, 9 threatened and endangered species occur in Vermilion Parish. Six of them occur in the Gulf of Mexico off the Parish coast (e.g., sea turtles and Gulf sturgeon). Piping plover and the brown pelican live and nest in coastal areas. 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 Vermilion 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 Fire Station Relocating Henry Fire Station (Proposed Action): Site inspections conducted on April 6, 2007, and April 19, 2007, did not indicate the presence of habitat suitable for the federal threatened and endangered species listed for Vermilion Parish. Through electronic mail consultation with USFWS dated April 25, 2007, the service stated that the proposed project would have no effect on Federal trust resources currently protected by ESA of 1973 (see *Appendix B*).

4.5 Cultural Resources

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

FEMA funding for the construction of the proposed Henry Fire Station would either directly or indirectly involve two 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 the original Henry Fire Station or at the proposed new location.

Alternative 2 - Construction of a New Fire Station Relocating Henry Fire Station (Proposed Action):

Pursuant to Section 106 and the Programmatic Agreement in effect, in a letter dated February 1, 2007 an engineering firm (Sellers & Associates) contracted by the Vermilion Parish Police Jury initiated consultation with the Louisiana State Historic Preservation Officer (SHPO) for the proposed construction of the Henry Fire Station in Erath, Louisiana. The Area of Potential Effect (APE) for the proposed undertaking consists of a one (1) and one half (1/2) acre recently plowed agricultural field located 3.5 miles southwest of Erath. To determine the presence of recorded archaeological sites in the project area, and to assess the potential or likelihood for unrecorded sites occurring in the project area, FEMA conducted a site inspection of the APE and a database search for archaeological sites within a one-mile radius of the APE on file in the Louisiana Division of Archaeology. Review of the database revealed that no cultural resources are located in the project area, or within approximately one (1) mile of the project area. The nearest recorded resource is site 16VM148, located 5,026 feet northwest from the project area. Two additional sites (16VM141 and 16VM149) are located 5,131 feet north and 7,175 feet northwest, respectively from the project area.

Pursuant to 40 CFR 1508.25, FEMA has determined that the demolition of the damaged Henry Fire Station located along LA 330 in Henry Louisiana is a connected action associated with the construction of the new fire station. Accordingly, FEMA has considered the potential impacts to cultural resources resulting from the proposed demolition activities. The APE for the proposed demolition is limited to the footprint of the damaged structure. The structure does not meet the 50-year-criterion, nor does it possess the level of exceptional importance required by Criterion Consideration G of the National Register Guidelines to be considered eligible for the National Register of Historic Places. To determine the presence of previously recorded archaeological sites in the APE, and to assess the potential for unrecorded sites occurring in the APE, FEMA conducted a site inspection of the APE and a database search for archaeological sites within a one-mile radius of the APE. Review of the database revealed that no archaeological sites are located in or within a one-mile radius of the project APE, suggesting that the potential for locating undocumented resources in the APE was low to extremely low. Results of the site inspection indicated that the project APE had been previously disturbed by the construction of the fire station and installation of associated utilities, confirming assessments of potential. Based on this review, FEMA has determined that pursuant to 36 CFR 800.3 (1), demolition of the damaged Henry Fire Station is an activity that will not have the potential to cause effects to historic properties. Therefore, FEMA has no further obligations under Section 106.

Based on this information, including the results of the site inspection, FEMA has determined that, as proposed, the undertaking will have no effect on cultural resources. FEMA determined that no historic properties would be affected by the proposed project.

On March 1, 2007, the SHPO determined pursuant 36 CFR Part 800.3(1), the proposed undertaking does not have the potential to cause effects to historic properties (*see Appendix B*).

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 PA contacts at FEMA, who will in turn contact FEMA Historic Preservation staff. The applicant cannot proceed with work until FEMA Historic Preservation staff has 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 (24) hours of the discovery. The applicant must also notify FEMA and the Louisiana Division of Archaeology by calling 225-342-8170 within seventy-two (72) 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.

4.5.2 Tribal Consultations

On November 6, 2000, President Clinton signed Executive Order (EO) 13175, entitled, “Consultation and Coordination with Indian Tribal Governments”. The EO 13175 directs federal agencies, “to establish regular and meaningful consultation and collaboration with tribal officials in the development of Federal policies that have tribal implications, to strengthen the United States government-to-government relationships with Indian tribes, and to reduce the imposition of unfunded mandates upon Indian tribes.

Requests for evaluation of the presence or absence of known archaeological and Indian Religious sites within the proposed project areas were submitted to the Chitimacha Tribe of Louisiana on August 29, 2007, in accordance with Section 106 of the National Historic Preservation Act. Vermilion Parish is part of the aboriginal Chitimacha homeland. This homeland contains many village sites, religious/sacred sites and burial sites, which must be taken into account in all alternatives considered for the proposed project.

Alternative 1 - No Action: The No Action alternative would have no affect on the Chitimacha Tribe of Louisiana.

Alternative 2 – Construction of a New Fire Station Relocating Henry Fire Station (Proposed Action): In a letter dated October 4, 2007, the Chitimacha Tribe of Louisiana stated their records and oral traditions do not indicate that a specific Chitimacha archaeological site or Traditional Cultural Property is in the immediate vicinity of the proposed site and therefore do not have an objection to the proposed action.

4.6 Air Quality

The Clean Air Act (CAA) of 1963, as amended, provides for federal protection of air quality by regulating air pollutant sources and setting emissions standards for certain air pollutants. Under CAA, states adopt ambient air quality standards in order to protect the public from potentially harmful amounts of pollutants. The United States 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, while attainment areas do meet ambient air quality standards. According to EPA, Vermilion 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 Fire Station Relocating Henry Fire Station (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 should be responsible for using BMP to reduce fugitive dust generation and diesel emissions.

Long-term emissions, such as those generated by small engines used for lawn maintenance offsite generation of electrical power, and emissions from the routine and emergency use of firefighting equipment are expected to be comparable to emissions generated by the previously existing fire station. In general, these impacts are expected to be minor and localized.

4.7 Noise

Noise is generally described as unwanted sound. The closest noise receptor is a residence approximately fifty (50) feet from the project site. Noise levels within and adjacent to the project area would increase during the proposed construction activities as a result of construction equipment and vehicular traffic. The increased noise levels would occur only during workday daylight hours for the duration of the construction work.

The Vermilion Parish local noise ordinance states that noise resulting from the construction and repairing of buildings must be limited to between the hours of 7:00 a.m. and 10:00 p.m., Monday through Friday, or between 9:00 a.m. 10:00 p.m. on weekends and Federal holidays, unless a variance is issued by the Parish Police Jury. The noise

ordinance specifically excludes emergency release devices, such as sirens typical of fire-fighting vehicles.

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

Alternative 2 – Construction of a New Fire Station Relocating Henry Fire Station (Proposed Action): Construction of the new fire station would result in an increase in noise resulting from the use of construction equipment and increased 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 Vermilion Parish as stated above. Long-term noise impacts will result from the use of emergency sirens mounted on fire-fighting vehicles, when used in the normal course of performance of the Fire Fighters' primary function of emergency response. These impacts are deemed to be minor, and generally beneficial to the overall public interest.

4.8 Traffic

The proposed site is located at the intersection of Frank Road and Louisiana Highway 331. The speed limit maximum is thirty-five (35) miles per hour on both of these roadways.

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

Alternative 2 – Construction of a New Fire Station Relocating Henry Fire Station (Proposed Action): Implementation of construction activities at the proposed project site would have a temporary effect on traffic by increasing the number of heavy machinery vehicles on Frank Road and Louisiana Highway 331. Construction traffic should be closely monitored and controlled as appropriate. All construction activities should be conducted in a safe manner in accordance with Occupational Safety and Health Act (OSHA) requirements.

Long-term, intermittent traffic impacts may result from the deployment of emergency vehicles by emergency response personnel, in the normal course of their duties. The resultant inconvenience to local motorists and pedestrians, is deemed to be outweighed by the benefit provided to the overall public safety and welfare.

Project implementation would result in no significant permanent increase in traffic on Frank Road or Louisiana Highway 331.

4.9 Safety

Safety and security issues that were considered include the health and safety of area residents, the public at-large, the population that would be served by the new fire station,

and the protection of personnel involved in activities related to implementation of the proposed project.

Alternative 1 - No Action: The No Action alternative could have a negative effect on the general safety of the residents of District 15. The lack of a passable facility would hinder fire protection for the population served.

Alternative 2 – Construction of a New Fire Station Relocating Henry Fire Station (Proposed Action): Construction of the new fire station would allow District 15 to continue, and expand if necessary, their fire protection operation. This operation is critical to the health and safety of residents throughout District 15.

The safety of workers involved with project implementation will be dependent on the policies of the contraction firms and the experience of the workers and supervisors. Contractors should insure compliance with all state and federal occupational safety regulations.

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 draft EA also evaluates the potential for the proposed project to use hazardous materials, generate hazardous wastes, and release hazardous substances.

A database search prepared 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 0.1 mile away.

A search of the LDEQ Electronic Document Management System (EDMS) database revealed several potential sites of concern for addresses in the immediate vicinity of the proposed site. On the Domingues Farm, 0.2 miles south of the proposed site, approximately 100 gallons of diesel was spilled into a drainage ditch in 2002. Based on the amount of fuel released, the distance from the proposed site, and the year this spilled occurred; it is unlikely that this incident affected the proposed site. There are numerous gas processing plants and pipelines listed in the LDEQ records along Aristide Road, at least 0.5 miles southeast of the site. In December 2005, approximately four (4) barrels of crude oil leaked from the Shell pipeline, located at 17453 Aurelien Road (approximately 1.0 mile south of the proposed site). According to LDEQ records, approximately 30 cubic yard of soil were excavated, and there were no groundwater impacts. Based on the relatively small amount of material released, the distance from the proposed site, and removal of the impacted soils, it is unlikely this incident has affected the proposed site. (see Appendix C)

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 Fire Station Relocating Henry Fire Station (Proposed Action): Findings 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 should 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 should be taken, and any hazardous and non-hazardous wastes generated should be disposed of in accordance with applicable federal, state, and local requirements.

4.11 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, 89.1 percent of the population of the Town of Erath is Caucasian, 6.2 percent is African American, and 3.5 percent is Asian. The median family income in 1999 was \$36, 204, and 15.5 percent of families earn below the poverty level.

Alternative 1- No Action: The No Action alternative would not have an adverse or disproportionate impact on minority or low-income populations.

Alternative 2 – Construction of a New Fire Station Relocating Henry Fire Station (Proposed Action): Construction of the new Henry Fire Station would not have adverse or disproportionate impacts on low-income or minority populations. The proposed project is a public facility that will serve all residents living in Vermilion Parish District 15.

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 EA, several conditions must be met and mitigation measures must be taken by the applicant prior to and during project implementation. The applicant is responsible for insuring that all work is conducted in accordance with Federal, State, and local laws and regulations, and that all work will be conducted in the least damaging, practicable manner.

- If the discharge of treated effluent from the wastewater treatment plant is to a drainage ditch that is connected to a surface water body (waters of the U.S.), then project implementation would require a permit from LDEQ's water quality program under Section 401 of CWA. A storm water pollution prevention plan must be prepared and BMP's for storm water management must be implemented in accordance with Federal and LDEQ regulations to avoid, minimize, and/or mitigate any detrimental effects to water quality resulting from project implementation.
- The proposed project should be coordinated with the Vermilion Parish floodplain administrator to insure compliance with Federal and local floodplain regulations and ordinances. Elevations should be in compliance with ABFE maps dated March 2006. Elevation information, signed and sealed by a licensed surveyor, engineer, or architect should be obtained and filed for verification of compliance. All permits and certificates, and all coordination pertaining to these permit(s), should be documented and provided to the local floodplain administrator, LA GOHSEP, and FEMA as part of the permanent project file.

- 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 PA contacts at FEMA, who will in turn contact FEMA Historic Preservation staff. The applicant cannot proceed with work until FEMA Historic Preservation staff has completed consultation with the Louisiana State Historic Preservation Officer (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 (24) hours of the discovery. The applicant must also notify FEMA and the Louisiana Division of Archaeology by calling 225-342-8170 within seventy-two (72) hours of the discovery. Work must not 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.
- The contractor must comply with local noise ordinances for Vermilion Parish as stated in Vermilion Parish Code. (*see Appendix C*).
- All construction activities should be conducted in a safe manner, and in accordance with OSHA requirements.
- Appropriate measures to prevent, minimize, and control spills of hazardous materials should be taken, and any hazardous and non-hazardous wastes generated should be disposed of in accordance with applicable Federal, State, and local requirements.

7.0 PUBLIC INVOLVEMENT

FEMA is inviting the public to comment on the proposed action during a fifteen (15) day comment period. A public notice has been published in the local newspaper, *Abbeville Meridional*, announcing the availability of this draft EA for review at the Vermilion Parish Library in Erath and Erath City Hall building. A copy of the Public Notice is attached in Appendix C.

8.0 AGENCY COORDINATION

As part of the development of early interagency coordination related to the proposed action (i.e. construction of a new fire station in a new, undeveloped location), state and federal resource protection agencies were contacted. These agencies include State Historic Preservation Officer, US Fish and Wildlife Service, US Department of

Agriculture, Natural Resources Conservation Service, the Governor's Office of Homeland Security and Emergency Preparedness, Louisiana Department of Environmental Quality, US Environmental Protection Agency, Louisiana Department of Natural Resources, United States Army Corps of Engineers, Town of Erath, and National Oceanic & Atmospheric Administration National Marine Fisheries Service.

9.0 CONCLUSION

Based upon the studies and consultations undertaken in the preparation of 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 fire station in the proposed location.

10.0 LIST OF PREPARERS

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Tiffany Spann – Environmental Team Lead, FEMA Louisiana TRO

Nicholas Knowles – Environmental Protection Specialist, FEMA Louisiana TRO

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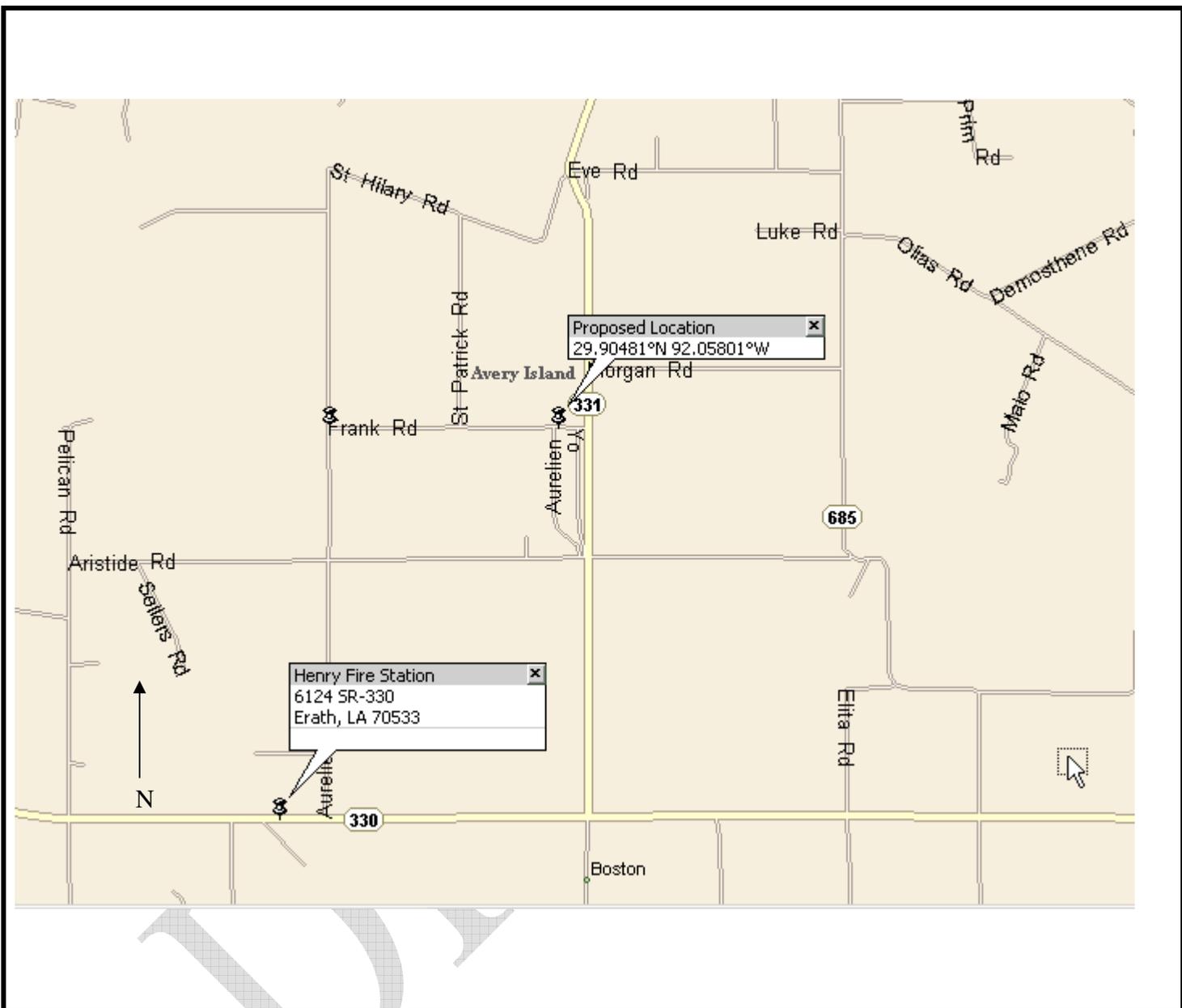


Figure 1: Henry Fire Station, Proposed New Location, Vermilion Parish, Louisiana

Federal Emergency Management Agency

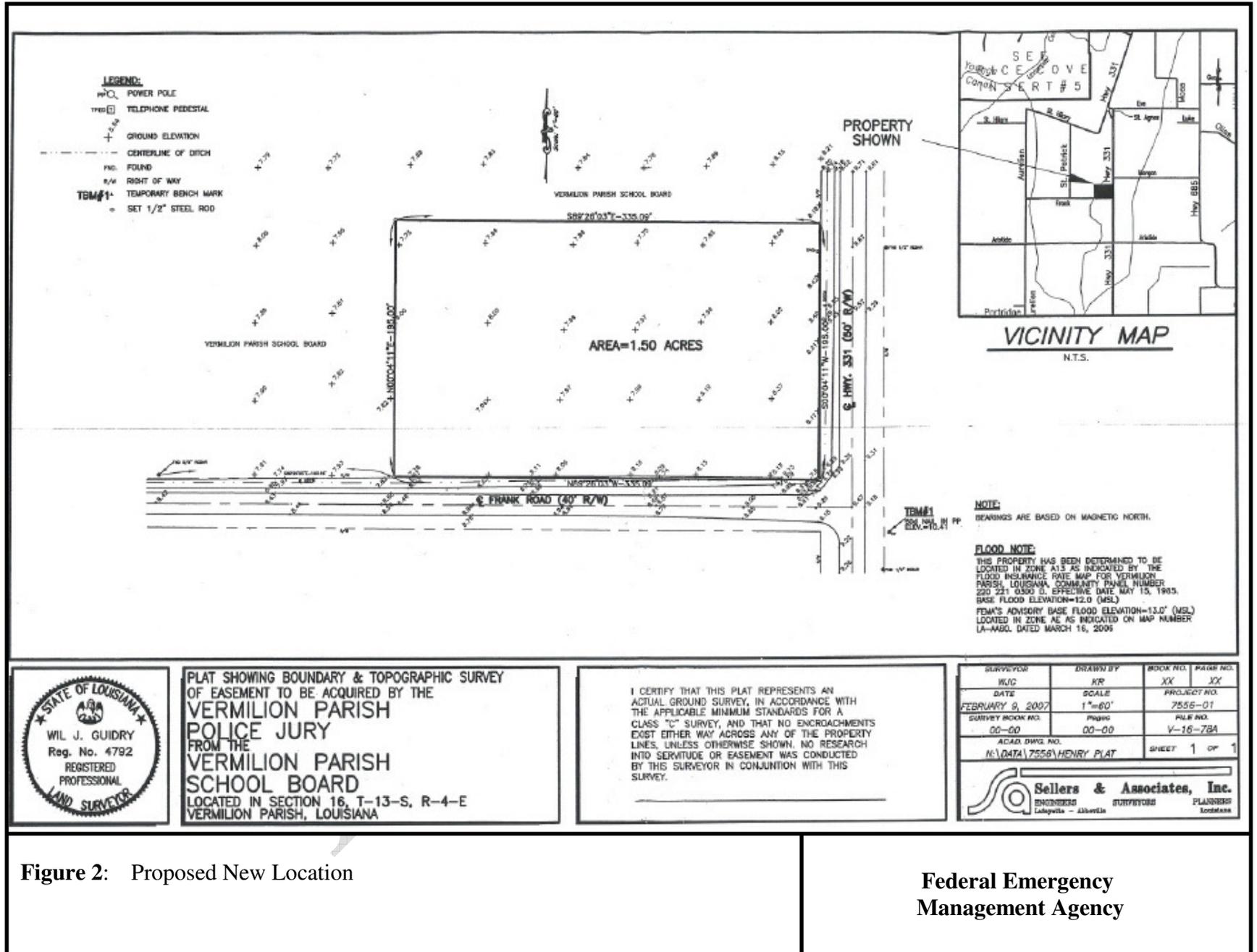


Figure 2: Proposed New Location

Federal Emergency
 Management Agency

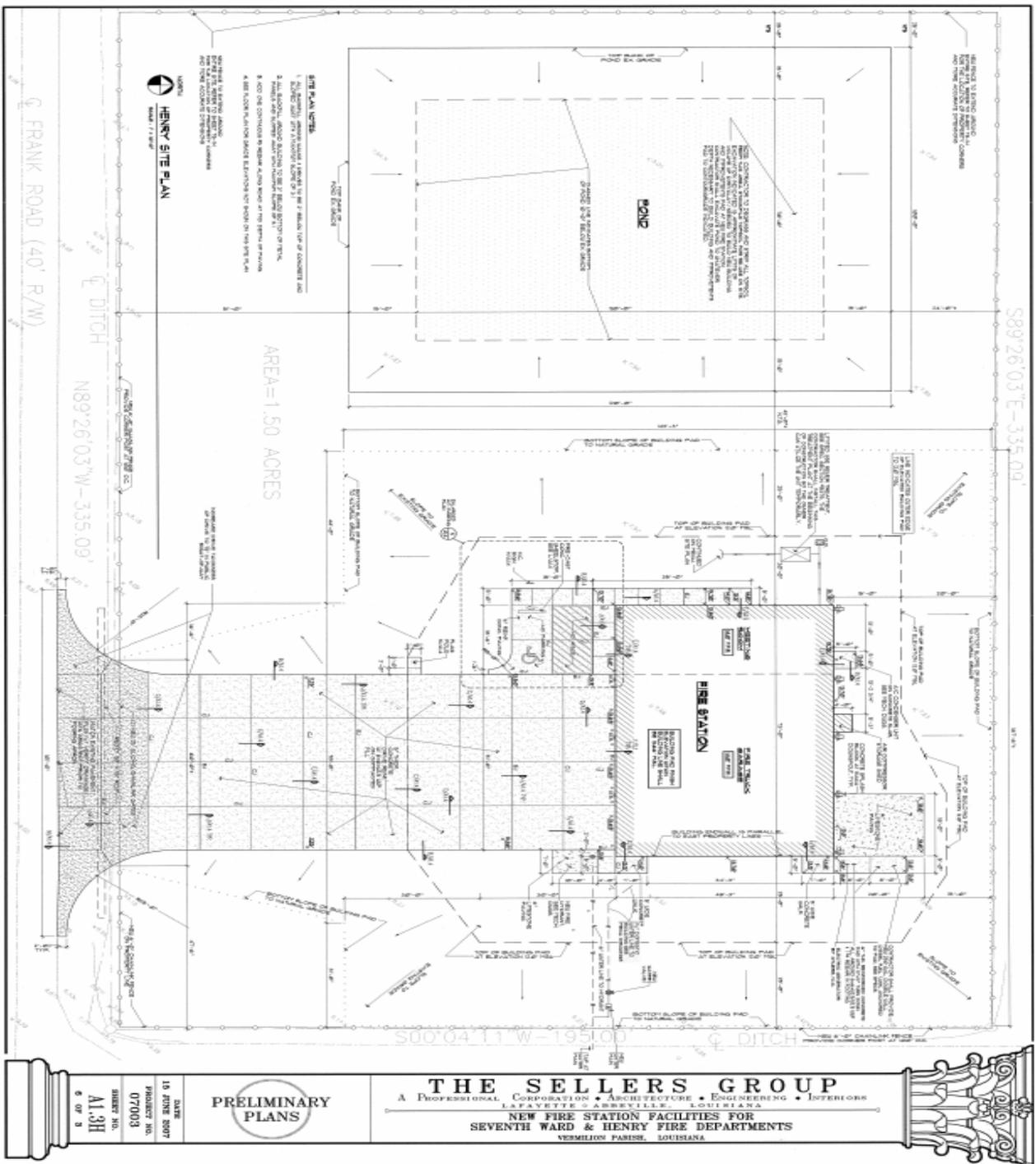


Figure 3: Proposed New Location Plan

Federal Emergency Management Agency

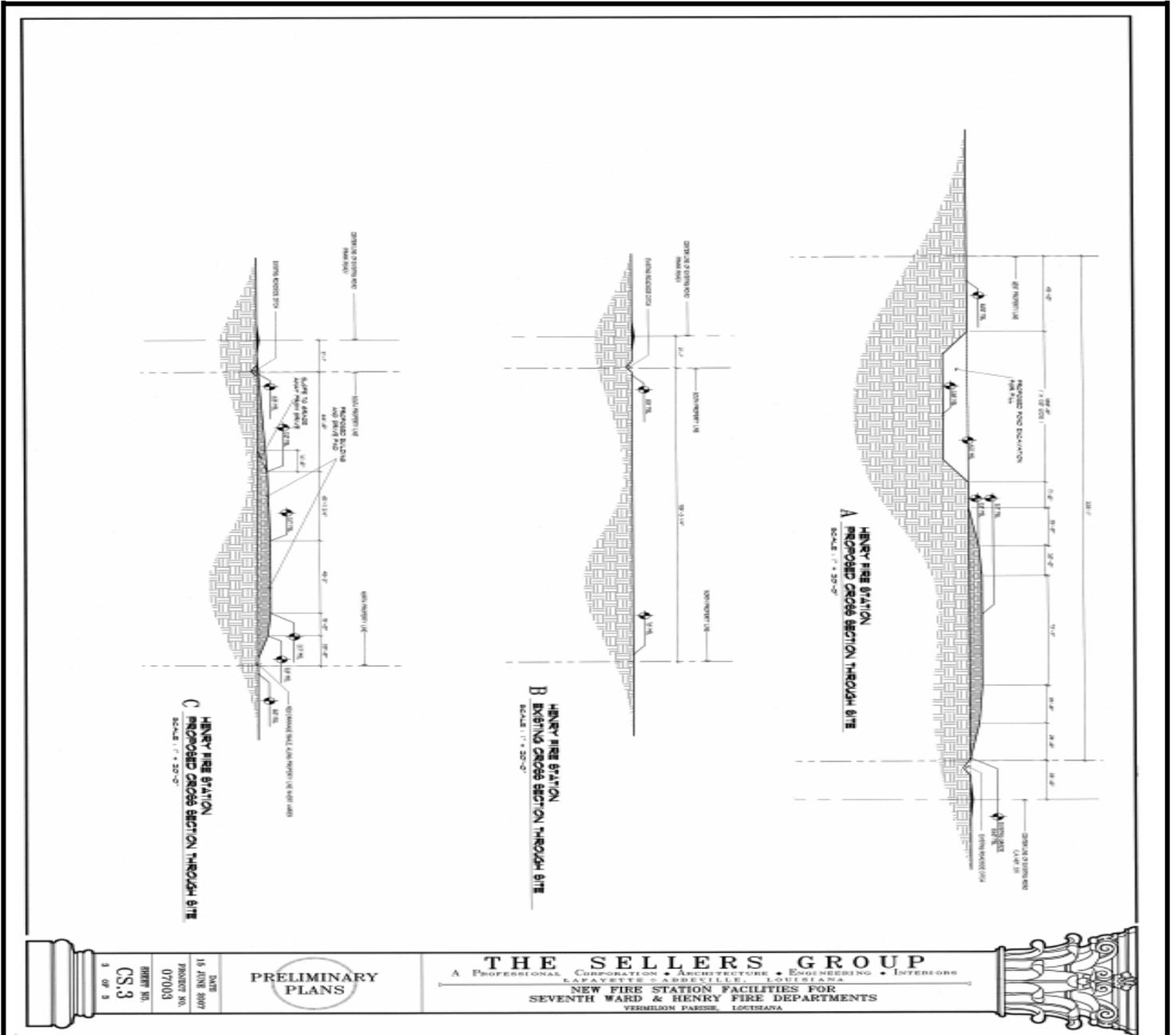


Figure 4: Proposed New Location Cross Sectional Drawing

**Federal Emergency
Management Agency**

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