



Draft Environmental Assessment

Seventh Ward Elementary School Flood Protection Embankment Project, Abbeville, LA

Vermilion Parish, Louisiana
HMGP 1603-0125

FEMA-1603-DR-LA

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FEMA

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LIST OF ACRONYMS

ABFE	Advisory Base Flood Elevation
ACHP	Advisory Council on Historic Preservation
BFE	Base Flood Elevation
BMP	Best Management Practices
CAA	Clean Air Act
CBRA	Coastal Barrier Resources Act
CBRS	Coastal Barrier Resources System
CFR	Code of Federal Regulations
CUP	Coastal Use Permit
CWA	Clean Water Act
CZMA	Coastal Zone Management Act
DFIRM	Digital Flood Insurance Rate Map
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
FWCA	Fish and Wildlife Coordination 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
NGVD	National Geodetic Vertical Datum
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service
NRHP	National Register of Historic Places
NRCS	Natural Resources Conservation Services
OPA	Otherwise Protected Area
OSHA	Occupational Safety and Health Administration
PDFIRM	Preliminary Digital Flood Insurance Rate Map
RCRA	Resource Conservation and Recovery Act
RHA	Rivers and Harbors Act
SDWA	Safe Drinking Water Act
SPD	Steel Discharge Pipe
SHPO	State Historic Preservation Office/Officer
SSA	Sole Source Aquifer
USACE	United States Army Corps of Engineers
USDA	United State Department of Agriculture
USFWS	United States Fish and Wildlife Service

VRP
WSRA

Voluntary Remediation Program
Wild and Scenic Rivers Act

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1.0 INTRODUCTION

1.1 Project Authority

Hurricane Katrina, a Category 4 hurricane with a storm surge above normal high tide levels, moved across the Louisiana, Mississippi and Alabama gulf coasts on August 29, 2005. Maximum sustained winds at landfall were estimated at 140 miles per hour. President Bush declared a major disaster for the State of Louisiana due to damages from Hurricane Katrina and signed a disaster declaration (FEMA-1603-DR-LA) on August 29, 2005, authorizing the Department of Homeland Security's Federal Emergency Management Agency (FEMA) to provide federal assistance in designated areas of Louisiana. FEMA is administering this disaster assistance pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), PL 93-288, as amended. Section 404 of the Stafford Act authorizes FEMA's Hazard Mitigation Program to provide funds to states and local governments to implement long-term hazard mitigation measures after a major disaster declaration.

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 DEA is to analyze potential environmental impacts of a proposed project at Cypress Park in Lacombe, LA. FEMA will use the findings in this DEA to determine whether to prepare an Environmental Impact Statement (EIS) or a Finding of No Significant Impact (FONSI).

1.2 Project Location

The Seventh Ward Elementary School is located at 12012 Audubon Road, Abbeville, LA (29.875454, -92.173033). The original school structure was constructed in 1968. An addition was constructed on the east side of the original structure. Vermilion Parish is located in Southwest Louisiana. It is a total of approximately 1,538 square miles, including 1,174 square miles of land and 365 square miles of water. It is bordered to the north by Lafayette Parish, to the east by Iberia Parish, to the south by the Gulf of Mexico, and to the west by Cameron Parish. The City of Abbeville is located in the northeast part of Vermilion Parish, and is the parish's largest municipality with approximately 53, 807 people according to 2000 figures. The Seventh Ward Elementary School is located approximately 7.5 miles southwest of Abbeville, Louisiana, (Figures 1 and 2). The Seventh Ward Elementary School is bounded to the north by Audubon Road, to the east and west by residential structures, and to the south by agricultural fields.

Figure 1: Site Location in Vermilion Parish, Louisiana

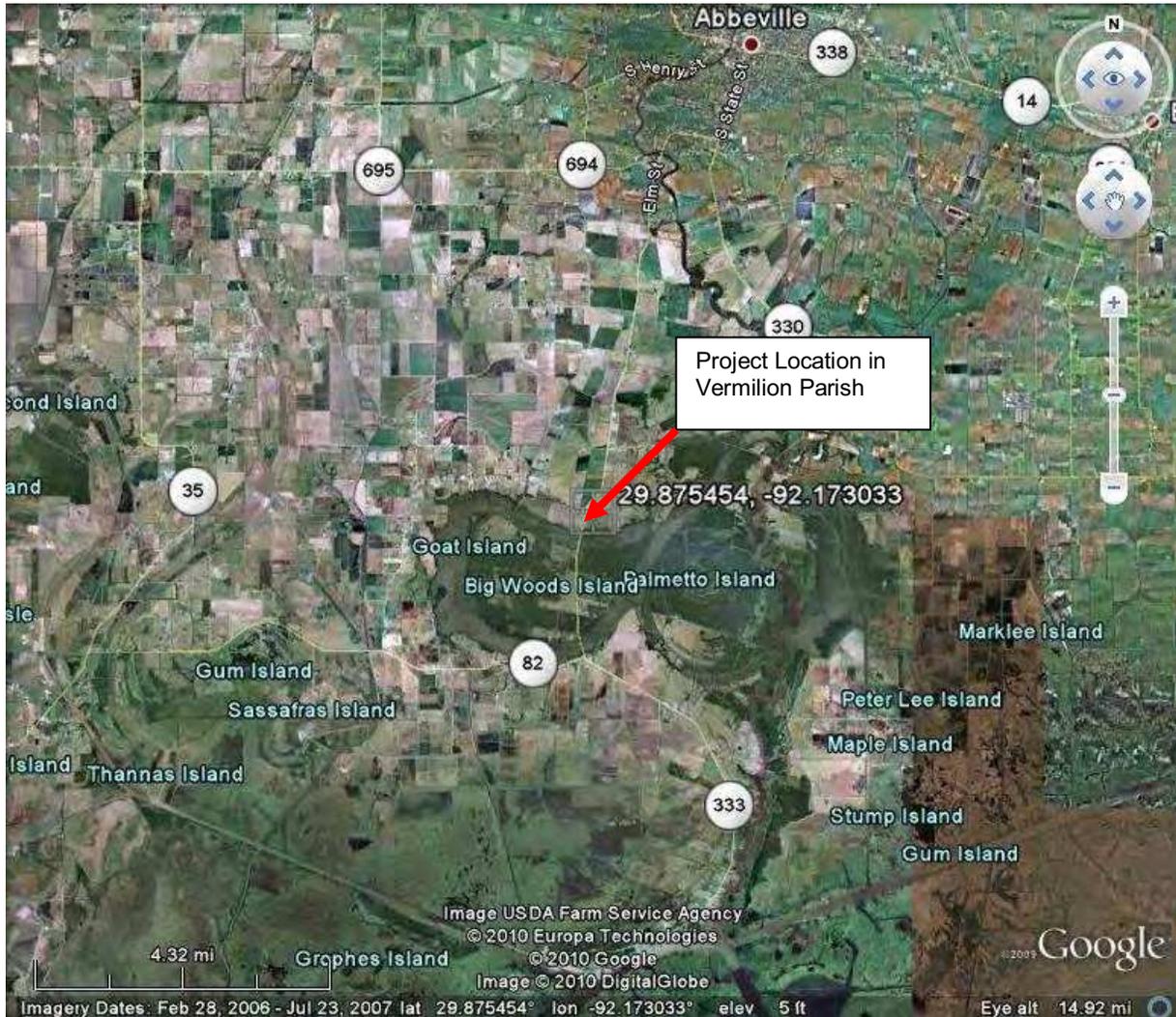


Figure 2: Seventh Ward Elementary School Flood Project Location



The closest named waterway is Little Bayou, which drains into the Vermilion River, and ultimately drains into Vermilion Bay, approximately 10 miles south of the project site. The area surrounding the Seventh Ward Elementary School is generally rural agricultural fields, with a few residential structures located near the school site. Extensive wetland areas were observed several hundred feet to the south of the elementary school property.

The school grounds have been cleared and the property is completely surrounded by chain link fencing. The ground surface was largely either sod or paved, with bare surfaces limited to the footprints of several trees placed around the grounds. The property slopes gently from north to south. FEMA conducted a site visit to the property on February 25, 2010, and met with Mr. Jerome Puyau, who is the Coordinating Supervisor of Maintenance for the Vermilion Parish School Board. According to Mr. Puyau, the school has already performed some mitigation measures, such as elevating some electrical equipment above the ABFE.

2.0 PURPOSE AND NEED

The Seventh Ward Elementary School, which has a student population of 282, ranging from Pre-K to 5th graders, has flooded on two occasions, once during Hurricane Rita and again during Hurricane Gustav. On each occasion, the school structure and the interior contents suffered significant damage. The purpose of this project is to reduce flooding damage to the structure and its contents caused by future severe storms, tropical storms, and hurricanes, and to prevent the hardship and inconvenience to the students and their parents associated with relocating the students to other schools. In addition to serving the community as an educational facility for students, the gymnasium of the Seventh Ward Elementary School serves as a gathering facility to the community for special events.

3.0 ALTERNATIVES

3.1 Alternative 1 - No Action

Under this alternative, Vermilion Parish would not construct the flood wall at the Seventh Ward Elementary School or install the required conveyance to reduce flooding of the school property. Consequently, the Seventh Ward Elementary School will continue to flood during severe storms, tropical storms, and hurricanes.

3.2 Alternative 2 – Construction of the flood wall at the Seventh Ward School (Proposed Action)

The proposed project is for construction of an approximately 2,000 linear foot earthen berm/flood wall around the perimeter of the school. Dimensions of the earthen berm will be approximately 700 linear feet long by 65.5 feet wide by 8.5 feet high and the proposed concrete flood wall will be 1,300 linear feet long by 1 foot wide by 8.5 feet high (with approximately 5.0 feet above the ground and 3.5 feet below grade for structural support), with 5 foot wide earthen embankment on both sides of the wall. The flood wall will be constructed on the same locations as the existing chain link fencing on the east and west sides of the property. On the north side, along Audubon Road, the flood wall will be constructed closer the building so that an existing utility pole will not need to be moved. There is a large live oak tree at the front of the school along Audubon Road. The applicant believes that this tree can remain; however, some of the peripheral roots will need to be cut to construct the flood wall. Approximately 9,878 cubic yards of topsoil will be hauled in to construct the earthen berm and approximately 2,921 cubic yards of native material will be excavated/backfilled for the installation of the floodwall and storm drain pipes. The proposed floodwall will require approximately 982 cubic yards of concrete and 1,325 cubic yards of rock/crushed stone for the foundation. The proposed project also includes the installation of a pumping station within the proposed berm area and a discharge ditch outside of the berm area. The planned activities will provide protection to three (3) feet above the current BFE and 3.8 feet above floodwater levels experienced during Hurricane Rita.

The earthen berm will be constructed of compacted fill and will be 65.5 feet in width, including a level top 6 feet wide, 34 feet of inside width, and 25.5 feet of outside width. The average ground elevation is 3.5 feet above mean sea level (msl). The earthen berm will be 8.5 feet high so the top of the berm will be 12 feet above msl, which is 1 foot above the BFE of 11 feet above msl. The inside of the earthen berm will be sloped 4:1 and the outside of the earthen berm will be sloped 3:1. The concrete flood wall will also be 12 feet in height and will be 1 foot thick. Numerous trees along the perimeter of the school property will need to be removed to construct the earthen berm and flood wall.

Three automatic gates will be installed along the Audubon Road side of the concrete flood wall. Automatic gates were selected over manual gates to eliminate the need for human intervention to protect the school prior to a flooding event and improve the safety for the elementary school staff and students. There will be a 4 foot gate at the existing pedestrian entrance of the school. Two 20-foot gates will be located near the northwest and northeast corners of the property, where the existing automobile entrance gates are located. The gates can be safely driven over by automobiles as long as they are raised less than 2 feet in height.

A pump station will be constructed at the southwest corner of the property inside the earthen berm. The pump station will be elevated 8.0 feet above msl with the pump and motor above the pump station. During heavy rain events, water will be pumped out the school property by the pump station and discharged via 65 foot by 30 inch steel discharge pipes (SDP), which will be sloped to match the invert. Department of Transportation and Development (DOTD) Class # 30 12 inch thick stone riprap will be also be added to the bottom and sides of the sluice gate to be located just outside the earthen berm and will extend 60.0 feet beyond the pipes.

An existing sewage treatment plant is located along the western boundary of the property. Based on the construction drawings for the project, the existing sewer treatment plant and all components will be removed and disposed of as per Louisiana Department of Environmental Quality (LDEQ) requirements. Compacted fill will be used to backfill the treatment plant location. A new Grinder sewage pump station will be constructed immediately east of the existing sewage treatment plant location and a 15 foot by 26.5 sewage package plant will be constructed southeast of the existing sewage plant. Sewage treatment will consist of aeration, clarification, and chlorination. The entire area will be contained with a 30 foot wide by 60 foot long by 6 foot high wooden fence.

Photographs 1 through 16 of the Seventh Ward Elementary School property and the surrounding area are presented in Appendix A.

Vermilion Parish has completed a project similar to the proposed project at Dozier Elementary School. The Vermilion Parish School Board has provided FEMA with photographs of the completed project. To provide the reader an idea of how the completed project at the Seventh Ward Elementary School will appear, photographs of

the Dozier Elementary School are presented in Appendix B, which includes photographs 17 through 19.

3.3 Alternatives Eliminated From Further Consideration

The following alternatives were considered by Vermilion Parish, but were eliminated from further consultation.

One alternative considered was to relocate students to Eaton Park Elementary School. Students were temporarily relocated to this school after Hurricane Rita; however, there was severe overcrowding. This caused undue hardship on the students of the school that was not damaged and inconvenience and the disruption normal school life for Seventh Ward Elementary School students and their parents. This alternative was dismissed because it is not a feasible long term solution.

Another alternative that was considered was to relocate the Seventh Ward Elementary School to a new location. However, the original damage to this building did not meet the replacement requirements as stipulated by FEMA; therefore, funding from FEMA would not be available. The School Board does not have the funds to relocate the school without FEMA assistance. In addition, the Seventh Ward students would have to relocate to another school during the reconstruction process.

A third alternative that was considered was to elevate the Seventh Ward Elementary School structure and all associated structures. To complete this alternative, the existing slab-on grade school would have to be demolished, elevated with fill, and the school rebuilt on fill. This alternative was determined not be cost beneficial and would result in the students having to relocate to another school during the construction process.

4.0 AFFECTED ENVIRONMENT AND IMPACTS

4.1 Geology and Soils

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.

The topography of the area is generally flat. The existing surface elevations on the property range from two feet to seven feet above mean sea level. According to the United States Department of Agriculture (USDA), National Resources Conservation Service (NRCS) Web Soil Survey, the soils of the proposed site are Jeanerette silt loam (Ja) and Patoutville silt loam, 0 to 1 percent slopes (Pa).

Jeanerette silt loam is found in meander scroll rises. The parent material is clayey and loamy fluviomarine deposits of the late Pleistocene age. Slopes are 0 to 1 percent, with a depth to restrictive moisture of more than 80 inches. This soil is somewhat poorly

drained, with a depth to the water table of 12 to 30 inches. The nonirrigated land capacity is 2w. Jeanerette silt loam is classified as prime farmland by NRCS and it is not a hydric soil. Jeanerette silt loam is rated as very limited for construction of embankments, dikes, and berm due to depth to the saturated zone and it is hard to pack.

Patoutville silt loam, 0 to 1 percent slopes is found in terraces landforms. The parent material is loamy alluvium of the late Pleistocene age. Slopes are 0 to 1 percent, with a depth to restrictive moisture of more than 80 inches. This soil is somewhat poorly drained, with a depth to the water table of 6 to 36 inches. The nonirrigated land capacity is 2w. Patoutville silt loam, 0 to 1 percent slopes is classified as prime farmland by NRCS and it is not a hydric soil. Patoutville silt loam, 0 to 1 percent slopes is rated as very limited for construction of embankments, dikes, and berm due to depth to the saturated zone and it is hard to pack.

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 the soils or geology of the area.

Alternative 2 – Construction of the flood wall at the Seventh Ward School (Proposed Action): Under Alternative 2, the construction of the flood wall would have some effect on geology and soils, mainly as part of the site preparation work. Soils will be exposed during excavation and trenching for conveyance piping. Additionally, the project would result in the compaction of the underlying soil. The soil around the construction site could be more susceptible to erosion if adequate drainage is not used and native vegetation is not planted.

The applicant's engineering consultant consulted with the NRCS regarding potential impacts to prime or unique soils that exist in the project area as defined in 7 CFR §658.2(a). In a response dated August 29, 2006, the NRCS indicated that "the project will not impact any on-going or existing NRCS projects, nor will it impact any Prime, Unique, or Local Important Farmland." Copies of the agency correspondence are presented in Appendix C.

After consultation and consideration of potential impacts to soil and geology, it was determined that implementation of the proposed project would result in minor and localized, short-term and long-term impacts. Soil erosion during construction would be minimized by the implementation of Best Management Practices (BMPs), such as using silt fencing, covering stockpiled soils, mulching cleared areas, and regenerating with native species. The applicant is expected to use BMPs to minimize impacts to soil. To

minimize disturbance, silt fences and storm water runoff best management practices would be utilized during construction. In general, effects to geology would be minimal and temporary in nature.

4.2 Water Resources

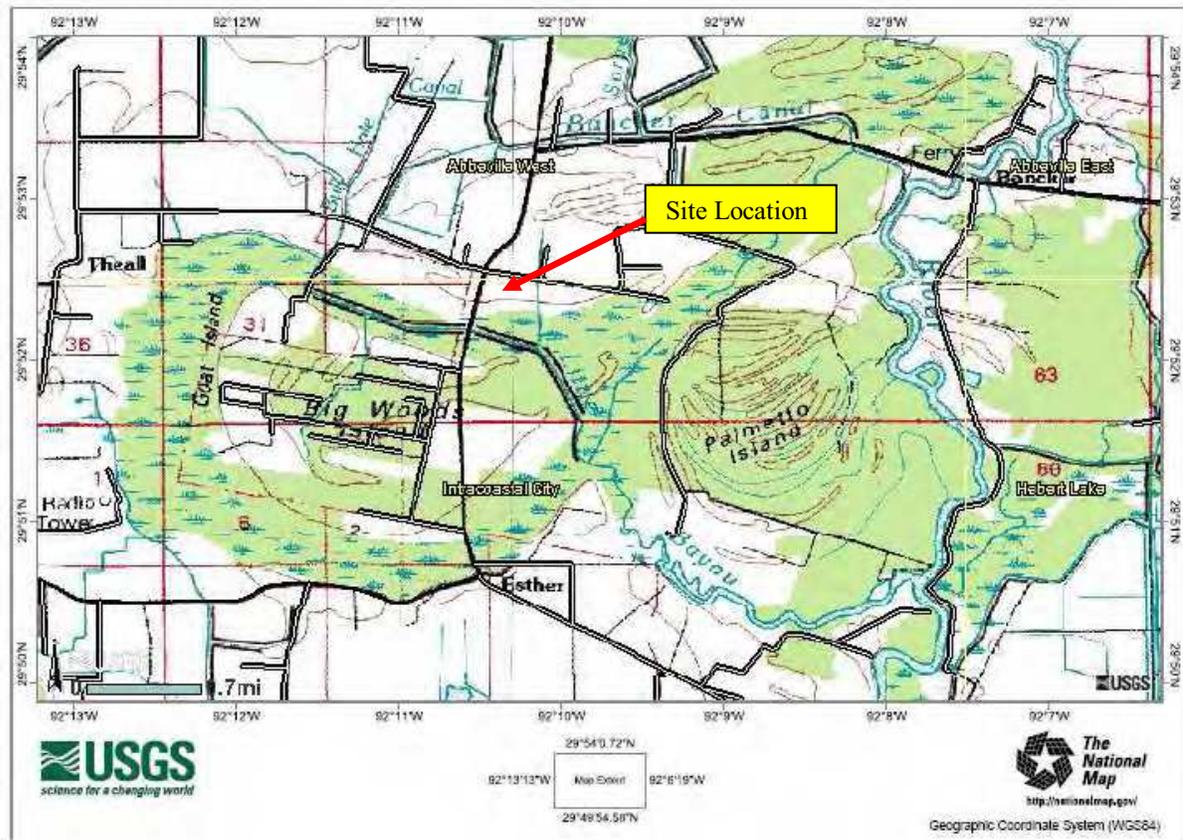
4.2.1 Surface Water

Surface water drains from the Seventh Ward Elementary School property from north to south, following the surface topography. Surface water initially drains into a small east to west ditch located south of the property boundary, which drains into a roadside ditch along Highway 82. This roadside ditch drains into an unnamed, man-made canal, which drains into Little Bayou; east of the Seventh Ward Elementary School (Figure 3). From Little Bayou, surface water flows south to the Vermilion River. The Vermilion River ultimately flows into Vermilion Bay.

Alternative 1- No Action: The No Action alternative would not change site drainage or have an effect on the surface water quality of the area.

Alternative 2 – Construction of the flood wall at the Seventh Ward School (Proposed Action): During construction there is the potential to impact surface waters through minor erosion and sedimentation. In order to minimize impacts to waters of the U.S., the contractor is required to implement BMPs that meet the LDEQ permitting specifications for storm water discharge regulated under Section 402 of the Clean Water Act (CWA). This includes designing the site with specific construction measures to reduce or eliminate run-off impacts. Any adverse effects to water quality associated with the construction of the projects would be short term and minimized by the measures described above.

Figure 3: Topographic Map of Surface Water Drainage in Project Area



4.2.2 Waters of the U.S. including Wetlands

Executive Order 11990, (Protection of Wetlands) requires federal agencies to take actions to minimize the destruction, loss, or degradation of wetlands, except when there are no practicable alternatives. This Executive Order also mandates that any wetlands impacted by a Federally-funded project be mitigated if avoidance or minimization of impacts is not possible.

The U.S. 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. USACE also regulates the building of any structures in waters of the U.S. pursuant to Section 10 of the Rivers and Harbor Act (RHA). There are no wild and scenic rivers, as designated under the Wild and Scenic Rivers Act (WSRA), in or near the project area.

Jurisdictional wetlands are defined 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. There are jurisdiction wetlands associated with the Cypress Bayou located within the project area. Jurisdictional wetland determinations are regulated

by the USACE pursuant to CWA. In addition, Executive Order 11990, Protection of Wetlands, directs federal agencies to take actions to minimize the destruction, loss, or degradation of wetlands.

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 regulated under Sections 401 or 404 of the CWA, or Section 10 regulated under the RHA.

Alternative 2 – Construction of the flood wall at the Seventh Ward School (Proposed Action): A review of soil survey maps for Vermilion Parish showed the presence of Jeanerette silt loam (Ja) and Patoutville silt loam, 0 to 1 percent slopes (Pa). Neither soil is classified as a hydric soil. There are no mapped wetlands within the project area. During a site visit, it was determined that no portions of project location are located a wetland. Extensive wetland areas were observed several hundred feet to the south of the elementary school property.

Per applicant's engineering consultant's coordination letter with Amy Powell, USACE, Solicitation of Views Manager, dated August 30, 2006, USACE stated that the project is not anticipated to have any adverse impacts to any Corps of Engineers projects; however, the project does not require a USACE permit under Section 404 of the Clean Water Act. Any changes or modifications to the proposed project will require a revised determination. Off-site locations of activities such as borrow, disposals, haul-and detour-roads, and work mobilization site developments may be subject to the USACE regulatory requirements and may impact a USACE project. Copies of the agency correspondence are presented in Appendix C.

4.2.3 Groundwater

The Safe Drinking Water Act (SDWA) was originally passed by Congress in 1974 to protect public health by regulating the nation's public drinking water supply and is administered by the Environmental Protection Agency (EPA). The law was amended in 1986 and 1996 and requires many actions to protect drinking water and its sources: rivers, lakes, reservoirs, springs, and ground water wells. Sole Source Aquifer designation is one tool to protect drinking water supplies in areas with few or no alternative sources to the ground water resource, and where if contamination occurred, using an alternative source would be extremely expensive. The designation protects an area's ground water resource by requiring EPA to review all proposed projects within the designated area that will receive federal financial assistance. All proposed projects receiving federal funds are subject to review to ensure they do not endanger the ground water source. The EPA defines a sole or principal source aquifer as one which supplies at least fifty percent (50%) of the drinking water consumed in the area overlying the aquifer. These areas can have no alternative drinking water source(s) which could physically, legally, and economically supply all those who depend upon the aquifer for drinking water. Sole Source Aquifers are regulated under Section 1424(e) of the SDWA.

Alternative 1- No Action: The No Action alternative would have no effect on the groundwater under the site.

Alternative 2 – Construction of the flood wall at the Seventh Ward School (Proposed Action): Per the applicant’s engineering consultant’s consultation letter with Clay Chesney, Coordinator Sole Source Aquifer Program, Ground Water/UIC Section of USEPA, dated August 22, 2006, the EPA stated that “The project is located on the Chicot aquifer system which has been designated a sole source aquifer by the EPA. We have determined that the project, as proposed, should not have an adverse effect on the quality of the ground water underlying the project site.” Copies of the agency correspondence are presented in Appendix C.

4.2.4 Floodplains

Executive Order 11988 (Floodplain Management) requires federal agencies to avoid or minimize development in the floodplain except when there are no practicable alternatives. Vermilion Parish enrolled in the National Flood Insurance Program on 5/31/77. Preliminary Digital Flood Insurance Rate Maps (PDFIRMs) were produced for Vermilion Parish, dated March 10, 2008; however, the Parish has not yet adopted these PDFIRMs. In 2006, FEMA issued a policy memo indicating the Advisory Base Flood Elevations (ABFEs) were to be used for project applications for all mitigation grants programs, unless the project is located within a V-zone on the DFIRM panel.

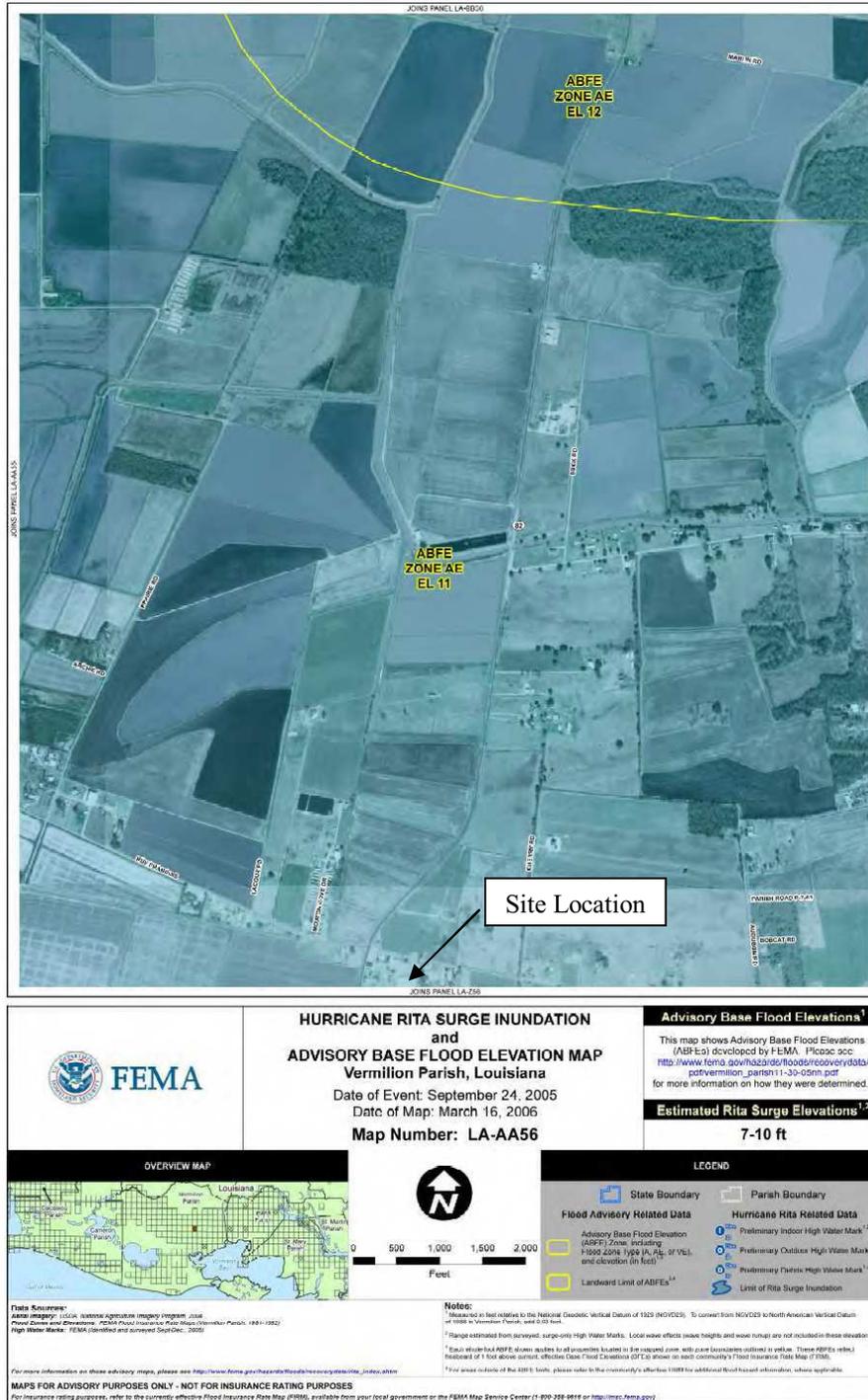
The project is located within ABFE zone ABFE AE (EL 11), according to Hurricane Rita Advisory Base Flood Elevation Map panels LA-AA56 and LA-Z56, dated March 16, 2006 (Figure 4A and 4B). The project is located within zone AE (EL 11) according to DFIRM panels 22113C 0350F and 22113C 0500F (Figure 5A and 5B), both with a preliminary date of March 10, 2008. Based on this information and the FEMA policy memo, the ABFE information will be used for this project.

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

Alternative 2 – Construction of the flood wall at the Seventh Ward School (Proposed Action): The project is located in Zone AE (EL 11). 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 applied to this mitigation project by the applicant and is described in Appendix D. In addition, according to Chris Theriot, Flood Plain Manager for the Vermilion Parish Police Jury, “After review of the proposed *Seventh Ward Elementary School Protection Embankment* project, I find that the project is consistent with flood plain management goals of reducing flood losses while not adversely impacting the natural resources and functions of the local flood plain.” A copy of this correspondence is presented in Appendix C. This action must be coordinated with the local floodplain manager as well as comply with

local floodplain ordinances. For the purposes of this study, there are no practical alternatives to the proposed action.

Figure 4A: Hurricane Rita Surge Inundation and Advisory Base Flood Elevation Panel LA-AA56



**Figure 4B: Hurricane Rita Surge Inundation and Advisory Base Flood Elevation
Panel LA-Z56**

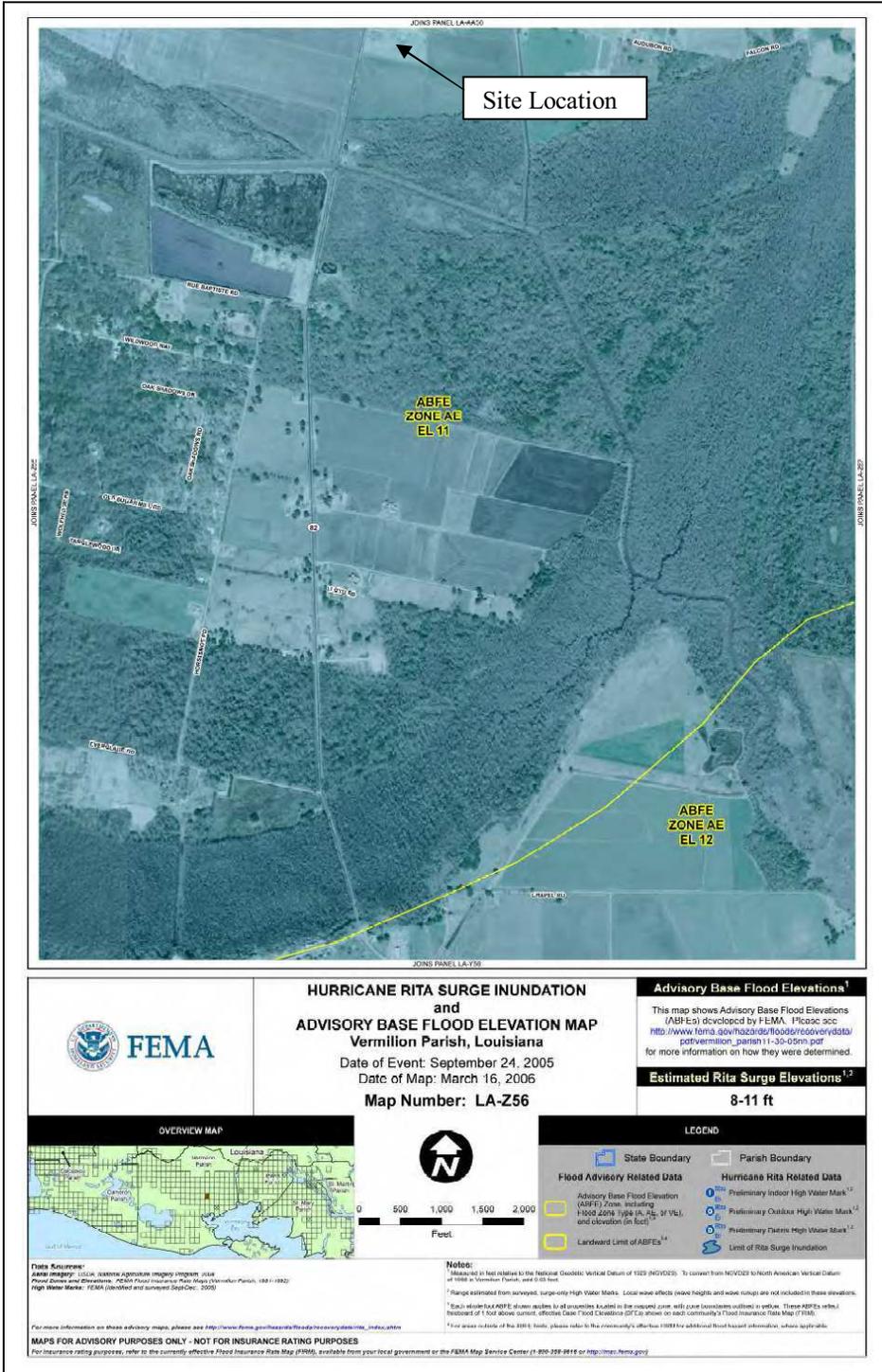


Figure 5A: Preliminary DFIRM Panel 22113C 0350F

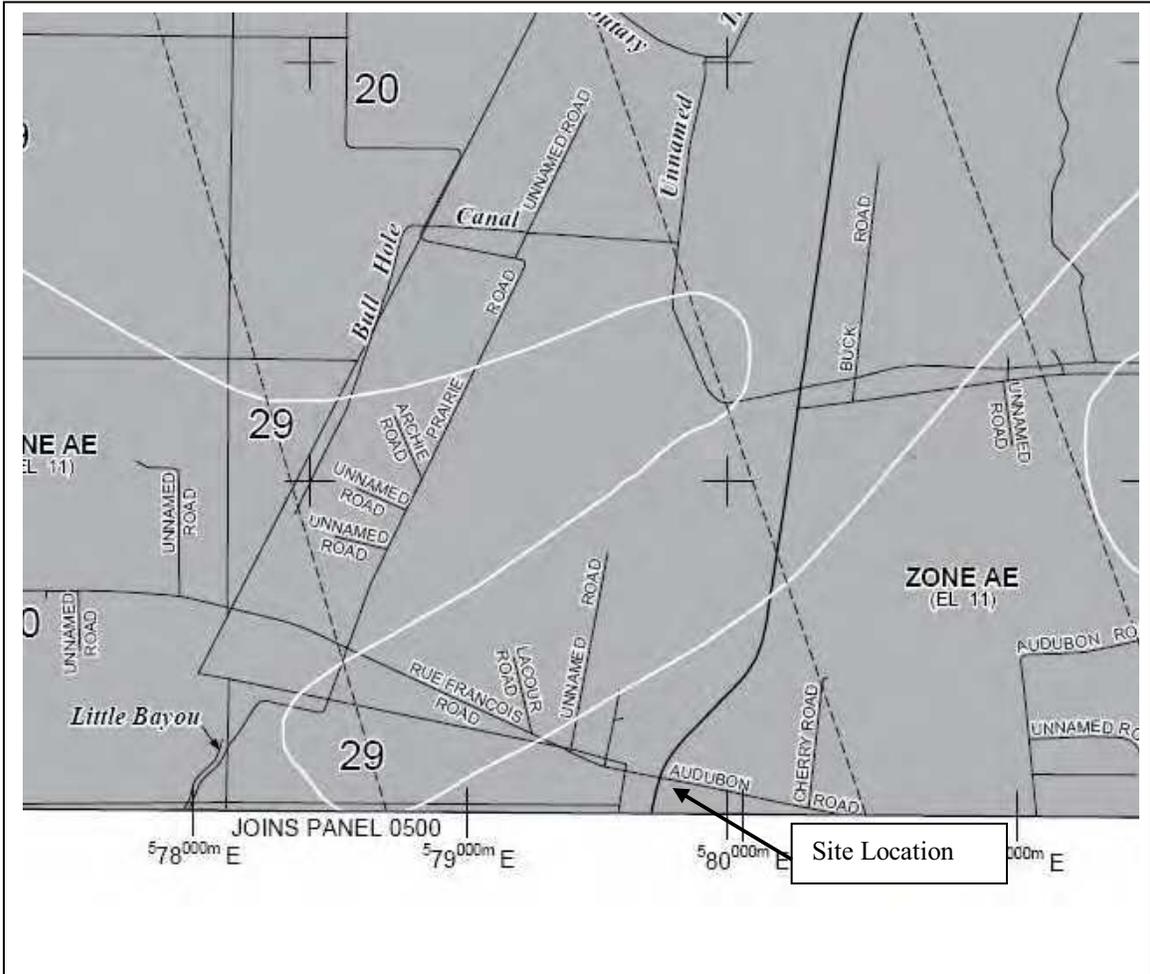
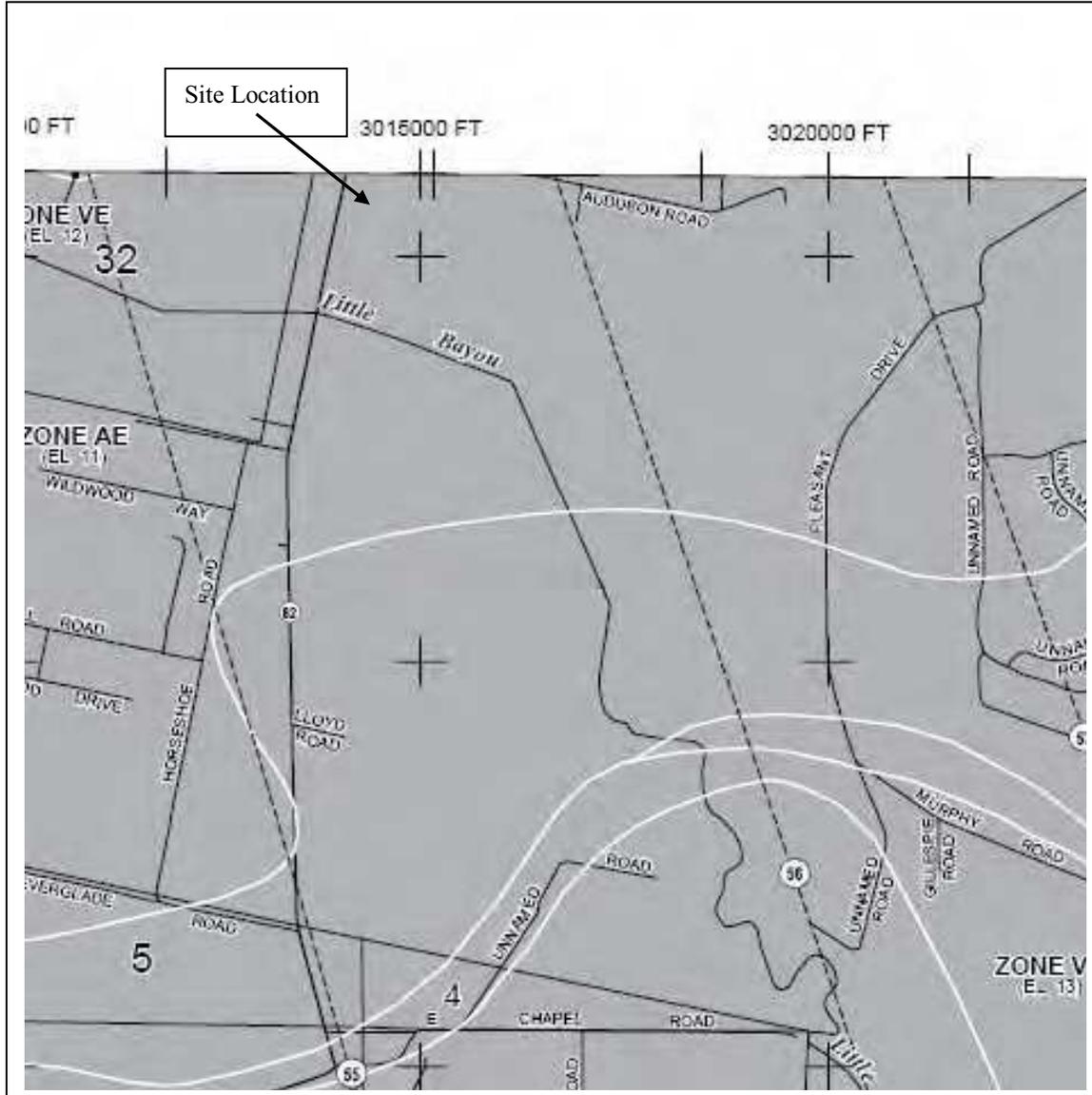


Figure 5B: Preliminary DFIRM Panel 22113C 0500F



A Drainage Analysis for the Seventh Ward Elementary School – Flood Control, was performed by Sellers and Associates, Inc., in June 2009. According to the study the proposed flood wall and associates embankment will be constructed to a finished elevation of 12 foot, resulting in one foot of freeboard above the ABFE. The existing surface elevations on the property range from two feet to seven feet above mean sea level. Design storm analysis used the 10- and 100-years storm 24-hour rainfall events equaling 8.8 inches and 13.2 inches, respectively. According to the study, “as a result of modeling both scenarios, the designed drainage network will route the 10-year and 100-year events without the flooding the existing school building.” Resulting discharge velocities are high enough that riprap will be installed at the outfall point to alleviate potential erosion. In addition, during low rainfall events, the 30-inch diameter gravity

outfall pipe will route runoff out of the network without the pumps operating. When flooding occurs, the sluice gate at the end of gravity outfall pipe will be closed and the pumping system will route all storm water capture in the network. The Drainage Analysis has been certified by Alan S. Jare, P.E., CPESC of Sellers & Associates, Inc., State of Louisiana Professional Engineer License No. 27298 in Mining Engineering. A copy of the Drainage Analysis is attached in Appendix D.

In addition, according to a “qualitative and a simplified, semi-quantitative approach” prepared by Donald B Boyle, PE, “it is anticipated that the construction of the ring berm at the Seventh Ward Elementary School would not result in a significant increase in the surrounding base flood elevation (BFE). It is more likely that the resulting BFE, if even measurable, would be several orders of magnitude less than 0.5 foot.” A copy of this document is attached in Appendix D.

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. A central requirement of the CZMA is that each state develops a management program for its coastal zone. In 1978, the Louisiana Legislature passed the State and Local Coastal Resources Management Act. This act established a coastal zone boundary and a system of Coastal Use Permits (CUPs) to regulate uses and activities in Louisiana’s coastal zone. These CUPs are required for those projects that have a direct impact on coastal waters.

Federally-funded activities that affect the coastal zone are also subject to federal consistency provisions of the CZMA. Before the federal agency can grant financial assistance, the applicant must attach a consistency certification issued by the state coastal agency.

The U. S. Fish and Wildlife Service (USFWS) administers the Coastal Barrier Resource Act (CBRA). The Act designated various undeveloped coastal barrier islands, depicted by specific maps, for inclusion in the Coastal Barrier Resources System (CBRS). Areas so designated were made ineligible for direct or indirect Federal financial assistance that might support development, including flood insurance, except for emergency life-saving activities. There are designated CBRS units in Louisiana and in Jefferson Parish, but not near the proposed project area.

Alternative 1- No Action: The No Action alternative would have no effect on the coastal zone or the Coastal Barrier Resource System.

Alternative 2 – Construction of the flood wall at the Seventh Ward School (Proposed Action): The proposed site is located within the designated Louisiana Coastal Management Zone. The applicant has obtained a Coastal Use Authorization/Consistency Determination, dated June 19, 2009, which indicates that the proposed activity is exempt

and a Coastal Use Permit is not required. Copies of the agency correspondence are presented in Appendix C.

The project site is not part of a CBRS and thus CBRA does not apply.

4.4 Biological Resources

4.4.1 Flora and Fauna

The habitat type identified in the project site is cleared, mowed grass, consistent with the site use as an elementary school. The area surrounding the Seventh Ward Elementary School is generally agricultural, with a few residential structures located near the school site. Extensive wetland areas were observed several hundred feet to the south of the elementary school property.

There are many mammals potentially found on the property, including: shrews, moles, opossums, armadillos, bats, squirrels, rabbits, rats and mice, raccoons, foxes, otters, nutria, coyote, and white-tailed deer. Birds found on the property include woodpeckers, flycatchers, blackbirds, thrushes, warblers, sparrows, hummingbirds, tits and chickadees, wrens, finches, Bald Eagles, Northern Mockingbirds, Northern Cardinals, Belted Kingfisher, turkeys, vultures, Mourning Doves, Blue Jays, American Crows, and Ruby-Crowned Kinglets. Reptiles include snakes, lizards and turtles.

The Fish and Wildlife Coordination Act (FWCA), as amended in 1964, was enacted to protect fish and wildlife when federal actions result in the control or modification of a natural stream or body of water. The statute requires federal agencies to take into consideration the effect that water-related projects would have on fish and wildlife resources; take action to prevent loss or damage to these resources; and provide for the development and improvement of these resources.

To comply with the requirements laid out in the statute, federal agencies must determine whether a proposed activity would result in the control or modification of a body of water. Typical actions that would fall under the jurisdiction of the Act include:

- discharges of pollutants, including industrial, mining, and municipal wastes or dredged and fill material into a body of water or wetlands; and
- projects involving construction of dams, levees, impoundments, stream relocation, and water-diversion structures.

If a proposed project would involve any of these activities or any other activity resulting in the control or modification of any water body for any purpose, then the federal agency must consult with the FWS (and National Marine Fisheries Service [NMFS], as appropriate) to develop measures to mitigate project-related losses of fish and wildlife resources.

The Bald Eagle, although officially de-listed as a threatened and endangered species on August 9, 2007, is protected under the Bald and Golden Eagle Act. The act states “that whomever takes, possess, sell, purchase, barter, offer to sell, purchase or barter, transport, export or import, at any time or in any manner, any bald eagle commonly known as the American eagle, or any golden eagle, alive or dead, or any part, nest, or egg thereof of the foregoing eagles, or whoever violates any permit or regulation issued..” shall face criminal penalties. “Take” is further defined as “pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb” and “transport” includes “ship, convey, carry, or transport by any means whatever, and deliver or receive or cause to be delivered or received for such shipment, conveyance, carriage, or transportation.”

Alternative 1- No Action: The No Action alternative would have no effect on the existing flora and fauna at the project area.

Alternative 2 – Construction of the flood wall at the Seventh Ward School (Proposed Action): The proposed site consists of cleared, maintained grassland that will require grading during construction activities. In general, the effect to flora and fauna would be temporary and minimal.

4.4.2 Threatened and Endangered Species

The Endangered Species Act (ESA) of 1973 provides for the protection of all listed threatened and endangered species. It is unlawful "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect ..." any protected species. Harm is further defined by the USFWS 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.

Correspondence with the USFWS field office in Lafayette identified two bird species that have inhabited the project area in the past and presently nest/live in nearby areas. These species are the Bald Eagle, the Red-Cockaded Woodpecker.

The threatened Bald Eagle (*Haliaeetus leucocephalus*) nests in bald cypress trees near fresh to intermediate marshes or open water. Bald eagles nest in Louisiana from October through mid-May.

The endangered Red-Cockaded Woodpecker (RCW) (*Picoides borealis*) nests in open, park-like stands of mature (i.e. greater than 60 years of age) pine trees containing little hardwood understory or midstory. RCW's can tolerate small numbers of overstory hardwoods or large midstory hardwoods at low densities found naturally in many southern pine forests, but they are not tolerant of dense hardwood midstories resulting from fire suppression. RCW's excavate roost and nest cavities in large living pines (i.e. 10 inches or greater in diameter at breast height). The cavity trees and the foraging area within 200 feet of those trees are known as a cluster. Foraging habitat is defined as pine

and pine-hardwood (i.e. 50% or more of the dominant trees are pines) stands over 30 years of age that are located contiguous to and within one-half mile of the cluster.

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

Alternative 2 – Construction of the flood wall at the Seventh Ward School (Proposed Action): A site visit was conducted on February 26, 2010, and no suitable endangered species habitat was observed on or immediately adjacent to the proposed project area. Per applicant’s engineering consultant’s consultation response from Gary Lester, of the Natural Heritage Program State of Louisiana Department of Wildlife and Fisheries, dated November 3, 2006, “...there no impacts to rare, threatened, or endangered species or critical habitats are anticipated for the proposed project. Per the applicant’s engineering consultant’s consultation response from Debbie Fuller, of the USFWS, dated August 3, 2006, the project “will have no effect on Federal trust resources under our jurisdiction and currently protected by the Endangered Species Act of 1973.” Copies of the agency correspondence are presented in Appendix C.

4.5 Cultural Resources

Section 106 of the National Historic Preservation Act (NHPA), as amended, and implemented by 36 CFR Part 800, requires federal agencies to consider the effects of their actions on historic properties and provide the Advisory Council on Historic Preservation (ACHP) an opportunity to comment on federal projects that will have an effect on historic properties prior to implementation. Historic properties are defined as archeological sites, standing structures, or other historic resources listed in or eligible for listing in the National Register of Historic Places (NRHP).

The Seventh Ward Elementary School was constructed in 1968. As the structure is less than 50 years of age, FEMA has determined that the structure is not eligible for listing in the National Register of Historic Places, nor does it contribute to a National Register-listed property or eligible Historic District.

Alternative 1 – No Action: The No Action alternative would have no effect on cultural resources.

Alternative 2 – Construction of the flood wall at the Seventh Ward School (Proposed Action): The scope of work indicates retrofit of the property, including construction of linear berms and floodwalls. As the undertaking involves significant ground disturbing activities, and no previous survey of the property has been undertaken, a site visit to this property was conducted by FEMA archaeologists David Gilmour and Pam Pyatt, accompanied by LA SHPO archaeology liaison Jason Emery on November 6, 2008. A series of 10 soil samples were taken around the perimeter of the property, concentrating on the areas to be most heavily impacted (please see attached Site Visit Report, Soil Test Results and corresponding Soil Test Location Map). The samples revealed both

disturbed and intact soils, however no cultural material or features were revealed. In general, all work on this property will occur within areas of low archaeological probability, and/or be confined to previously disturbed areas.

FEMA, in consultation with the State Historic Preservation Office (SHPO), has determined that these activities will have no adverse effect on historic properties that are listed in or eligible for the National Register of Historic Places that fall within the Areas of Potential Effects. Copies of the agency correspondence are presented in Appendix C.

4.6 Air Quality

The Clean Air Act (CAA) requires that 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 (EPA 2006) and the LDEQ, per an email response from Diane Hewitt, dated March 12, 2010, Vermilion Parish is an attainment area. Copies of the agency correspondence are presented in Appendix C.

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

Alternative 2 – Construction of the flood wall at the Seventh Ward School (Proposed Action): Pollutant emissions from construction equipment may result in minor, temporary impacts to air quality in the area immediately surrounding the construction activity. Impacts primarily result from the following activities:

- Fugitive dust generated during construction operations; and
- Construction activities including the use of construction equipment involving:
 - Operation of equipment;
 - Movement of trucks containing construction materials;
 - Use of paving equipment;
 - Asphalt curing; and
 - Commuting of construction workers.

To ensure that the potential dust generation does not impact the surrounding area, BMPs such as using wetting agents, or cleaning equipment as they leave the site, would be used in all construction phases of the project. Construction vehicle emissions can be mitigated through operational controls (equipment idle reduction and control, engine preventive maintenance, or equipment operator training); fuel usage strategies (ultra-low sulfur

diesel or bio-diesel); or equipment strategies (retrofit technologies, engine re-power or upgrades, or electrification).

No long term air quality impacts are expected.

4.7 Noise

Noise is generally described as unwanted sound. The closest noise receptors to the project site are less than 50 feet. There are several residential properties in the immediate area. Noise levels within and adjacent to the project area would increase during construction activities as a result of construction equipment and vehicular activity.

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

Alternative 2 – Construction of the flood wall at the Seventh Ward School (Proposed Action): Construction of the flood wall would result in an increase in noise. The increase is expected to be temporary and would not affect any sensitive receptors.

4.8 Hazardous Materials

Hazardous wastes, as defined by the Resource Conservation and Recovery Act (RCRA), are defined as "a solid waste, or combination of solid wastes, which because of its quantity, concentration, or physical, chemical, or infectious characteristics may (1) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible or incapacitating reversible illness or (2) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported or disposed of or otherwise managed."

A database search revealed that there are no Voluntary Remedial Program (VRP) or Brownfield sites in or adjacent to the project area. Searches of numerous EPA and LDEQ solid and hazardous waste databases revealed air pollutant emissions sites or sites having registered underground storage tanks in or near the project area. There are no debris sites within project area. No underground or aboveground storage tanks were observed on the property during a site visit conducted on February 25, 2010.

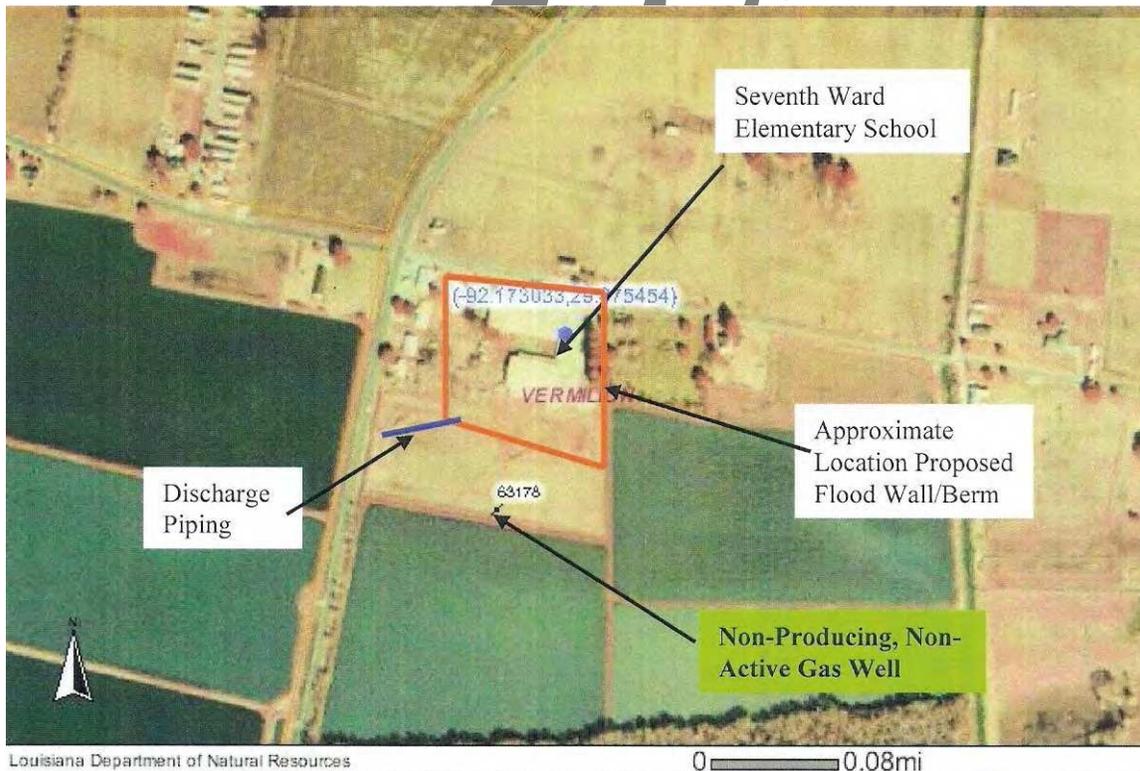
The Seventh Ward Elementary School has a LPDES General Permit for Class II Sanitary Discharges, which was renewed on July 1, 2008 and expires in five years. The permit number is LAG540765. The site has one outfall location from which the site discharges treated sanitary wastewater. The maximum discharge of treated sanitary wastewater totals less than 25,000 gallons per day. The site is required to adhere to effluent limitations and monitoring requirements of the permit and report the findings to the LDEQ on regular basis. Treated water is discharged into the small east to west ditch located south of the property boundary, which drains into a roadside ditch along Highway

82. This roadside ditch drains into an unnamed, man-made canal, which drains into Little Bayou, located east of the Seventh Ward Elementary School. From Little Bayou, surface water flows south to the Vermilion River. The Vermilion River ultimately flows into Vermilion Bay.

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 the flood wall at the Seventh Ward School (Proposed Action): According to the LDNR Strategic Online Natural Resources Information System (SONRIS) web site, there is a non-producing, non-active oil/gas well (# 63178) located approximately 350 feet south of the Seventh Ward Elementary School structure, and approximately 200 feet south of the proposed earthen berm (Figure 6). FEMA conducted a site visit to the property on February 25, 2010. It appears that the oil/gas well, as mapped, is located south of the Seventh Ward Elementary School property line. Based on this, it appears that the construction of the earthen berm/concrete flood wall and associated staging of construction materials and equipment should have no impact on the oil/gas well.

Figure 6: Project Map Showing Approximate Project Footprint and the Abandoned Oil/Gas Well



However, given the proximity of the oil/gas well to the proposed construction area, FEMA initiated consultation with the LNDR regarding this well on February 17, 2010 to determine if there were any potential issues regarding the well and the proposed construction action or if any notifications to the LDNR would be required prior to construction of the flood wall/earthen berm. According to an email dated February 19, 2010, the LDNR indicated that no notifications are required to the LDNR Office of Conservation. Copies of the agency correspondence are presented in Appendix C.

FEMA also initiated consultation with the LDEQ regarding the oil/gas well on February 17, 2010. According to an email dated March 12, 2010, the LDEQ had no comments regarding the oil/gas well. Copies of the agency correspondence are presented in Appendix C.

Construction of the proposed flood wall would not disturb any hazardous materials or create any potential hazard to human health. If hazardous materials are unexpectedly encountered in the project area during the proposed construction operations, appropriate measures for the proper assessment, remediation, management and disposal of the contamination would be initiated in accordance with applicable federal, state, and local regulations. The contractor would be required to take appropriate measures to prevent, minimize, and control the spill of hazardous materials in the construction area.

4.9 Environmental Justice

Executive Order 12898, entitled "Federal Actions 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.

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

Alternative 2 – Construction of the flood wall at the Seventh Ward School (Proposed Action): The proposed action is not expected to have adverse or disproportionate impacts on minority or low-income populations.

4.10 Public Safety and Access

Facilities that are federally funded must comply with accessibility standards under the Architectural Barriers Act (ABA). The ABA applies to facilities designed, built, altered, or leased with federal funds. Several agencies maintain ABA standards which are being revised according to guidelines the Board jointly updated under the ABA and the ADA. The General Services Administration (GSA) updated its ABA standards, which apply to most facilities covered by the ABA (except postal, residential, and military facilities). Per Section F202.2 of the ABA Standards which covers additions to existing

structures, each addition to an existing building or facility shall comply with the requirements for new construction.

In addition, construction activities could present safety risks to those performing the activities and any other persons who attempt to enter the site during construction activities.

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

Alternative 2 – Construction of the flood wall at the Seventh Ward School (Proposed Action): According to Mr. Puyau, should the school need to be evacuated due to a fire or other event, a staging area/area of rescue of sufficient size has been designated for student and faculty assembly at the southeast corner of the property, inside the proposed flood wall/earthen berm. In addition, Mr. Puyau indicated that the earthen berm has been designed to be sloped in such a way to allow for persons in wheelchairs or having other special needs to be evacuated over the berm, should this be required.

Under the Proposed Action Alternative, construction activities could present safety risks to those performing the activities. To minimize risks to safety and human health, all construction activities would be performed using qualified personnel trained in all appropriate safety precautions, including the proper use of the appropriate equipment. Additionally, all activities will be conducted in a safe manner in accordance with the standards specified in OSHA regulations. To alert motorists and pedestrians of project activities, appropriate signage and barriers would be on site prior to and during construction activities. The construction of earthen berm at the Fork Island/East Broussard School is not likely to result in adverse effects to the safety of the residents of Vermilion Parish.

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. The impact of Hurricane Katrina in Vermilion Parish resulted in either wind or flood damage to many structures. There have been other projects to repair other structures to pre-disaster condition with upgrades to codes and standards. The cumulative impact to the natural resources within Vermilion would be small and not likely to adversely affect the Parish as a whole. The human environment of Vermilion Parish would be impacted by reducing the flood hazards within the Seventh Ward Elementary School area, while not significantly affecting the flood hazards in the surrounding area. On a whole the human environment of Vermilion Parish would benefit by the project.

6.0 CONDITIONS AND MITIGATION MEASURES

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

Environmental

- In order to minimize impacts to waters of the U.S., the contractor is required to implement BMPs that meet the LDEQ permitting specifications for storm water discharge regulated under Section 402 of the CWA. This includes designing the site with specific construction measures to reduce or eliminate run-off impacts.
- Riprap will be installed at the outfall point to alleviate potential erosion.
- Appropriate erosion control measures should be employed during the construction of the project to minimize any adverse effect on the surrounding environment.
- The contractor will be responsible for keeping all excavated areas periodically sprayed with water, all equipment maintained in good working order, and all construction vehicles would be limited to 15 mph to minimize pollution/fugitive dust.
- If the project results in a discharge to waters of the state, submittal of a Louisiana Pollutant Discharge Elimination System (LPDES) application may be necessary.
- If the project results in a discharge of wastewater to an existing wastewater treatment system, that wastewater treatment system may need to modify its LPDES permit before accepting the additional wastewater.
- LDEQ has stormwater general permits for construction areas equal to or greater than one acre. It is recommended that the LDEQ Water Permit Division be contacted at (225) 219-3181 to determine whether the proposed improvements require one of these permits.
- All precautions should be observed to control nonpoint source pollution from construction activities.
- Any changes or modifications to the proposed project will require a revised determination. Off-site locations of activities such as borrow, disposals, haul-and detour-roads and work mobilization site developments may be subject to the Department of the Army regulatory requirements and may have an impact to a Department of Army project.

- If any of the proposed work is located in wetlands or other areas subject to the jurisdiction of the U.S. Army Corps of Engineers, USACE should be contacted directly to inquire about the possible necessity for permits. If a Corps permit is required, part of the application process may involve a water quality certification from LDEQ.
- All precautions should be observed to protect the groundwater of the region.
- Please be advised that water softeners generate wastewaters that may require special limitations, depending on local water quality considerations. Therefore, if water system improvements include water softeners, the applicant is advised to contact the LDEQ Water Permits to determine if special water quality-based limitations will be necessary.
- Any renovation or remodeling must comply with LAC 33:III. Chapter 28. Lead-Based Paint Activities, LAC 33:III. Chapter 27, Asbestos Containing Materials in Schools and State Buildings (includes all training and accreditation), and LAC 33:III.5151. Emission Standard for Asbestos for renovations or demolitions.
- If any solid or hazardous wastes, or soils and/or groundwater contaminated with hazardous constituents are encountered during the project, notification to LDEQ's Single-Point-of-Contact (SPOC) at (225) 219-3640 is required. Additionally, precautions should be taken to protect workers from these hazardous constituents.
- The applicant would be responsible for contacting the USFWS if there is a change in the scope of work, the project necessitates removal of mature pine trees, construction activities have not been initiated within one year, or if any new bald eagle nests are observed in proximity to the proposed project activities during the next nesting season (October 1 through mid-May). If the projects have not been initiated within one year, follow up consultation is required with the USFWS prior to construction.

Safety and Traffic

- Construction traffic should 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. To minimize risks to safety and human health, all construction activities would be performed using qualified personnel trained in all appropriate safety precautions, including the proper use of the appropriate equipment. To alert motorists and pedestrians of project activities, appropriate signage and barriers would be on site prior to and during construction activities. During construction activities, the construction site(s) will be fenced off to discourage trespassers.

Cultural Resources

- If archaeological artifacts or features (prehistoric or historic) are discovered during the course of FEMA funded work at the Seventh Ward Elementary School, the Applicant must ensure that their Contractor stops work in the vicinity of the discovery and takes all reasonable measures to avoid and minimize harm to the discovery. The Applicant shall inform GOHSEP and FEMA of the discovery and FEMA will deploy an archaeologist to the location to conduct a site condition assessment. The Applicant will not proceed with work until FEMA has completed consultation with the SHPO on the treatment of the discovery.
- In addition, if human remains are discovered during the course of FEMA funded work, the Applicant and the Applicant's Contractor are responsible for immediately halting work within the vicinity of the human remains finding. The Applicant will immediately notify GOHSEP, FEMA, the local Police Department, and the local Coroner's Office of the discovery. The local Coroner's Office will assess the nature and age of the human skeletal remains. If the Coroner's Office determines that the human skeletal remains are older than 50 years of age, the Louisiana Division of Archaeology will take jurisdiction over the remains. Within twenty-four (24) hours, FEMA will notify the Louisiana Division of Archaeology (225-342-8170) of the finding. Within seventy-two (72) hours, FEMA will take the lead in working with the Louisiana Division of Archaeology and other interested parties, as necessary, to ensure compliance with the Louisiana Unmarked Human Burial Sites Preservation Act (R.S. 8:671 *et seq.*) and other applicable laws. In addition, the Applicant must afford FEMA the opportunity to comply with the "Human Remains Policy" set forth by the Advisory Council on Historic Preservation (ACHP).

Failure to comply with these conditions may make part or all of these projects ineligible for FEMA funding.

7.0 PUBLIC INVOLVEMENT

The public will be invited to comment on the proposed action. A legal notice was published in the following newspapers: The *Abbeville Meridional* and the *Baton Rouge Advocate* from June 29, 2010 to July 2, 2010. Additionally the Environmental Assessment was made available at the Vermilion Parish Library (Abbeville Branch) from June 29, 2010 to July 13, 2010. The Environmental Assessment was published on FEMA's and the Parish's official websites. A copy of the Public Notice is attached in Appendix E.

8.0 AGENCY COORDINATION

Environmental Protection Agency
U.S. Fish and Wildlife Service

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

9.0 CONCLUSION

Based upon the studies and consultations undertaken in this environmental assessment, and given the precautionary and mitigating measures, there does not appear to be any significant environmental impacts associated with the proposed construction of the flood wall/earthen berm flood protection at the Seventh Ward Elementary School, Abbeville, LA. Therefore, the proposed action meets the requirements of a Finding of No Significant Impact (FONSI) under NEPA and the preparation of an Environmental Impact Statement (EIS) will not be required.

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**APPENDIX A
SITE PHOTOGRAPHS**



Photo 1 - View of the west automobile entrance to the property. An automatic gate is proposed for this location.



Photo 2 - Residential structures located adjacent to the elementary school building to the west.



Photo 3 - View of the rear of the elementary school showing structures to the west of the school structure.



Photo 4 - View of the rear of the elementary school showing play areas and evacuation assembly areas.



Photo 5 - View of the south side of the elementary school property. The proposed earthen berm will be constructed in this area.



Photo 6 - View of the east side of the Seventh Ward Elementary School property.



Photo 7 - View of eastern boundary of the school property showing residential structure adjacent to the school to the east.

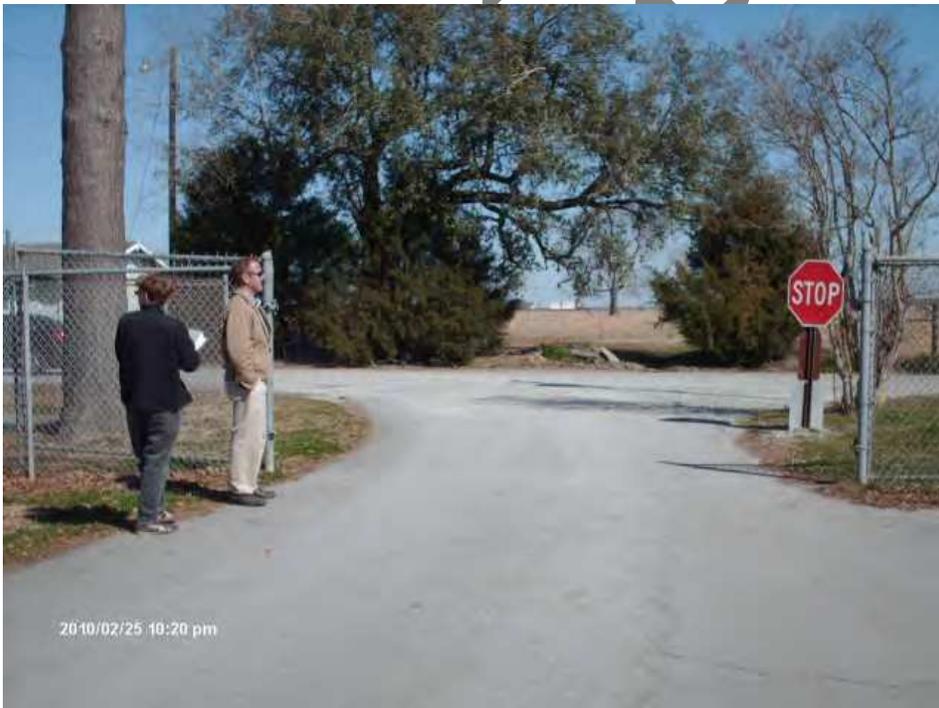


Photo 8 - View of the east side automobile exit. An automatic gate will be constructed here.



Photo 9 - View of residential structure located east of the Seventh Ward Elementary School.

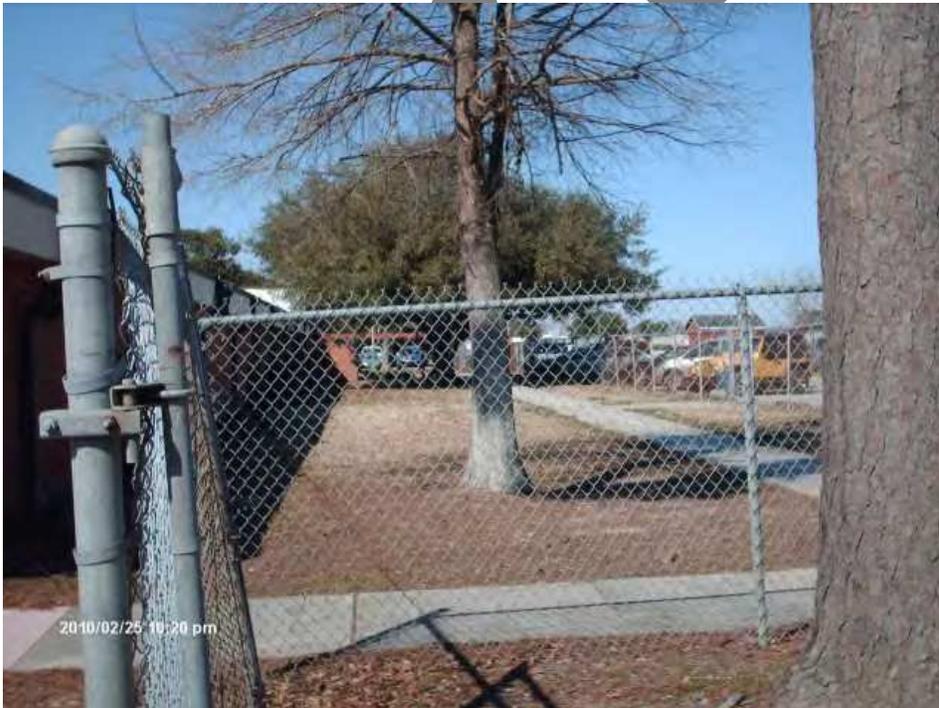


Photo 10 - View of the north side of the school property along Audubon Road showing large live oak tree.



Photo 11 - View of residential structure located west of the Seventh Ward Elementary School.



Photo 12 - View of area south of the Seventh Ward Elementary School structure.



Photo 13 - View of roadside drainage ditch along Highway 82. This ditch receives surface water runoff from the Seventh Ward Elementary School during rain events.



Photo 14 - View of southwest corner of the elementary school structure from Highway 82 showing an adjacent residential structure to the west of the school.



Photo 15 - View structures located along Audubon Road near Highway 82 west of the Seventh Ward Elementary School.



Photo 16 - View of area south of the Seventh Ward Elementary School structure.

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APPENDIX B

PHOTOGRAPHS OF DOZIER ELEMENTARY SCHOOL



Photo 17 - View of the floodwall at Dozier Elementary School. The floodwall at the Seventh Ward Elementary School will be of similar appearance and height.



Photo 18 - The Dosier Elementary School, showing the flood wall height relative to the school structures.



Photo 19 - View of the floodwall at Dozier Elementary School, which shows the flood wall and an automatic gate.

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APPENDIX C
AGENCY CORRESPONDENCE

United States
Department of
Agriculture

Natural Resources
Conservation Service
Phone 337-893-5664 Ext.3
Fax 337-893-9225

PO Box 68
Abbeville, LA
70511-0068

To: Sellers & Associates, Inc.
100 Thomas Street
Abbeville, LA 70510

Date: August 29, 2006

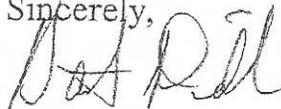
Re: Vermilion Parish police Jury
FEMA Hazard Mitigation Grant Program
7th Ward School
File No. 7343-01

Dear Ms. Girouard,

Our office has reviewed the proposed project and we find that the project will not impact any on-going or existing NRCS projects; nor will it impact any Prime, Unique or Local Important Farmland. One item to consider is this: the project site is located in a 100 year flood plain. To levee off an area in the flood plain will displace flood waters with the next flooding event. And that could create a problem with the surrounding residences.

Please call if you have any questions.

Sincerely,



Bart Devillier
District Conservationist



DEPARTMENT OF THE ARMY
NEW ORLEANS DISTRICT, CORPS OF ENGINEERS
P. O. BOX 60267
NEW ORLEANS, LOUISIANA 70160-0267

REPLY TO
ATTENTION OF

AUG 30 2006

Operations Division
Operations Manager
Completed Works

Ms. Elizabeth S. Girouard
Sellers & Associates, Inc.
148B Easy Street
Lafayette, Louisiana 70506-3095

Dear Ms. Girouard:

This is in response to your letter dated August 3, 2006, on behalf of the Vermilion Parish Police Jury, concerning the construction of the 7th Ward School flood protection project, as part of the FEMA Hazard Mitigation Grant Program, in Vermilion Parish, Louisiana.

We have reviewed your request for potential Department of the Army regulatory requirements and impacts on any Department of the Army projects.

We do not anticipate any adverse impacts to any Corps of Engineers' projects.

Based on review of maps, aerial photography, and soils data, we have determined that this property is not in a wetland subject to Corps of Engineers' jurisdiction. A Department of the Army permit under Section 404 of the Clean Water Act will not be required for the deposition or redistribution of dredged or fill material on this site.

Off-site locations of activities such as borrow, disposals, haul-and detour-roads and work mobilization site developments may be subject to Department of the Army regulatory requirements and may have an impact on a Department of the Army project.

This determination of permit requirements is valid for a period of five years from the date of this letter unless new information warrants a revision prior to the expiration date. In addition, any changes or modifications to the proposed project may require a revised determination.

Please contact Dr. John Bruza, of our Regulatory Branch by telephone at (504) 862-1288, or by e-mail at John.D.Bruza@mvn02.usace.army.mil for questions concerning wetlands determinations or need for on-site evaluations. Questions concerning regulatory permit requirements may be addressed to Mr. Ronnie Duke by telephone at (504) 862-2261 or by e-mail at Ronnie.W.Duke@mvn02.usace.army.mil.

Future correspondence concerning this matter should reference our account number MVN-2006-2991-SQ. This will allow us to more easily locate records of previous correspondence, and thus provide a quicker response.

Sincerely,


Amy E. Powell
Solicitation of Views Manager



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

August 22, 2006

Ms. Elizabeth S. Girouard
Sellers & Associates, Inc.
148B Easy St.
Lafayette, LA 70506-3095

Dear Ms. Girouard:

Thank you for your August 3, 2006, letters requesting our evaluation of the potential environmental impacts, which might result from the following projects:

Vermilion Parish, Louisiana

**File No. 7240-10
Water Treatment Retrofitting
Delcambre, Louisiana**

**File No. 7242-02
Construction of Police
and Fire Station
Erath, Louisiana**

**File No. 7343-01
Retrofitting Project
Forked Island/East
Broussard Elementary
Forked Island, Louisiana**

**File No. 7343-01
Retrofitting Project
7th Ward School
Vermilion Parish**

The projects, proposed for financial assistance through the Federal Emergency Management Agency are located on the Chicot aquifer system which has been designated a sole source aquifer by the EPA. They are potentially eligible for review by EPA. Based on the information provided for the projects, we have determined that the projects, as proposed, should not have an adverse effect on the quality of the ground water underlying the project sites.

This approval of the proposed projects does not relieve the applicant from adhering to other State and Federal requirements, which may apply. This approval is based solely upon the potential impact to the quality of ground water as it relates to the EPA's authority pursuant to Section 1424(e) of the Safe Drinking Water Act.

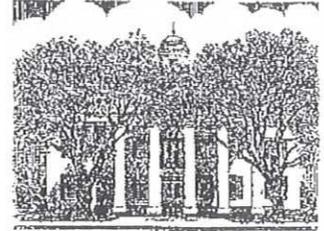
If you have any questions on this letter or the sole source aquifer program please contact me at (214) 665-7128.

Sincerely yours,

A handwritten signature in cursive script that reads "Clay Chesney".

Clay Chesney, Coordinator
Sole Source Aquifer Program
Ground Water/UIC Section

cc: Howard Fielding, Program Manager



VERMILION PARISH POLICE JURY

Courthouse Bldg.

100 N. State St., Suite 200

Abbeville, Louisiana 70510

337-898-4300

FAX 337-898-4310

WAYNE TOUCHET
PRESIDENT

DANE HEBERT
VICE-PRESIDENT

CHRIS THERIOT
ADMINISTRATOR /
SECRETARY-TREASURER

MEMBERS

DISTRICT 1
DANE HEBERT

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CHRIS BERAUD

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RONALD DARBY

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DISTRICT 10
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DISTRICT 11
PERVIS GASPARD

DISTRICT 12
CLORIS J. BOUDREAUX

DISTRICT 13
T. J. PREJEAN, JR.

DISTRICT 14
LEON BROUSSARD

March 4, 2010

Mr. D. Casey Levy
State Hazard Mitigation Officer
Governor's Office of Homeland Security
and Emergency Preparedness
415 North 15th Street, 4th Floor
Baton Rouge, Louisiana 70802

Re: Flood Plain Manager Review
Vermilion Parish Police Jury
HMGP #1603-113-0001
7th Ward Flood Protection

Dear Mr. Levy,

After review of the proposed *Seventh Ward Elementary School Flood Protection Embankment* project, I find that the project is consistent with flood plain management goals of reducing potential flood losses while not adversely impacting the natural resources and functions of the local flood plain.

If there any questions regarding the review please do not hesitate to contact me.

Sincerely,

Chris Theriot, Flood Plain Manager
Vermilion Parish Police Jury

cc: Gene Sellers, Sellers and Associates, Inc.

DEPARTMENT OF NATURAL RESOURCES
COASTAL MANAGEMENT DIVISION
P.O. BOX 44487
BATON ROUGE, LOUISIANA 70804-4487
(225) 342-7591
1-800-267-4019

COASTAL USE AUTHORIZATION/CONSISTENCY DETERMINATION

C.U.P No.: P20090308
NAME : VERMILION PARISH POLICE JURY
SELLERS & ASSOCIATES, INC.
148-B EASY STREET
LAFAYETTE, LA 70506-3095
Attn: Eugene M. Sellers
LOCATION: Vermilion Parish, LA
Lat. 29° 52' 33.13" N, Long. 92° 10' 25.64" W; Section 65, T13S-R3E; Abbeville,
70510.
DESCRIPTION: Proposed construction of approximately 2000' of earthen levee/flood wall around the 7th Ward Elementary School to protect from coastal flooding caused by hurricanes. Dimensions of proposed earthen levee will be approximately 700' x 75' x 9' and of proposed concrete flood wall will be 1300' x 1' x 8', with 5' wide earthen embankment on both sides of wall. Approximately 9878 cubic yards of topsoil will be hauled in to construct the earthen levee and approximately 2921 cubic yards of native material will be excavated/backfilled for the installation of the flood wall and storm drain pipes. The proposed flood wall will require approximately 982 cubic yards of concrete and 1325 cubic yards of rock/crushed stone for the foundation. The proposed project also includes the installation of a pumping station within the proposed leveed area and a discharge ditch outside of leveed area.

Pursuant to the State and Local Coastal Resources Management Act of 1978, as amended (La. R.S. 49:214.34.A), the proposed activity (flood protection levee) is exempt and a Coastal Use Permit is not required.

This determination is valid for two (2) years from the date of this letter. If the proposed activity is not initiated within this two year period, this determination will expire and the applicant will be required to submit a new application. The applicant will notify the Coastal Management Division of the date on which initiation of the proposed activity began by entering a commencement date through the online system, or by mailing said information to CMD. This determination does not eliminate the need to obtain a permit from the United States Army, Corps of Engineers or any other Federal, state, or local approval, that may be required by law.

This determination has been made on the basis of information provided by your application. If it is later established that you furnished erroneous data, you may be directed to alter or modify your plans, to remove structures you have installed, and/or to restore the work area to pre-project conditions at your own expense. If it is established that you knowingly furnished erroneous data, you could also be subject to legal action.

The drawings submitted with your referenced application are attached hereto and made a part of the record. If you have any questions regarding this authorization, please contact our office (225) 342-7591 or (800) 267-4019.

***** End of Determination *****

By accepting this determination the applicant agrees to its terms and conditions.

I affix my signature and issue this determination this 19th day of June, 2009.

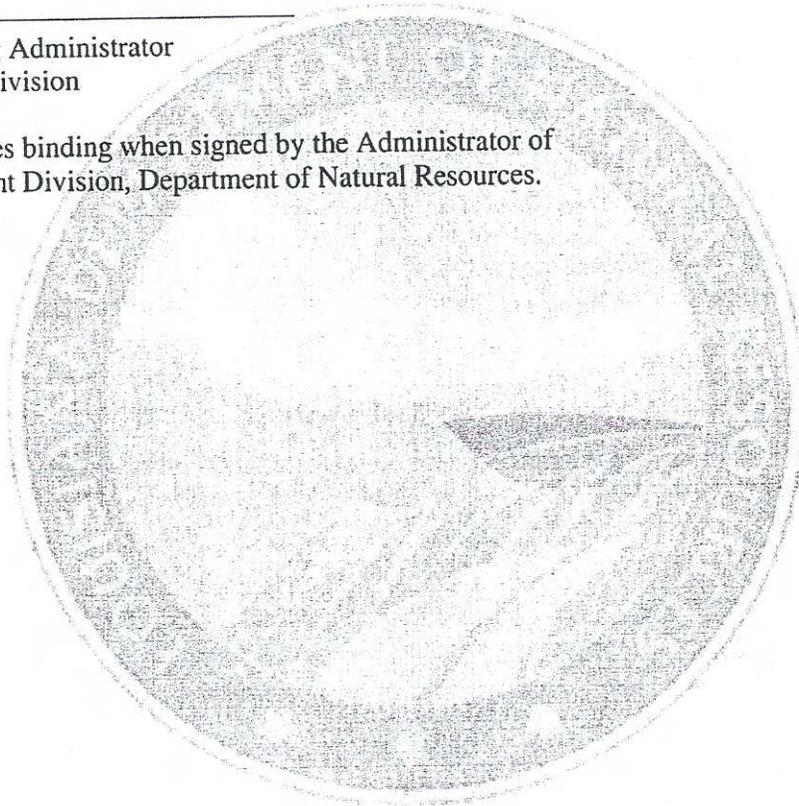
DEPARTMENT OF NATURAL RESOURCES

Karl L. Morgan

Karl L. Morgan, Acting Administrator
Coastal Management Division

This agreement becomes binding when signed by the Administrator of
the Coastal Management Division, Department of Natural Resources.

Attachments



P20090308

VERMILION PARISH POLICE JURY w/attachments

06/19/2009

Page 3 of 3

Final Plats:

1) P20090308 Final Plats 06/16/2009

cc: Pete Serio, COE w/attachments
Dave Butler, LDWF w/attachments
Chuck Spears, CMD/SS w/attachments
Charlie Mestayer, CMD/FI w/attachments

VERMILION PARISH POLICE JURY w/attachments





State of Louisiana

Department of Wildlife & Fisheries
Post Office Box 98000
Baton Rouge, LA 70898-9000
(225) 765-2800

Janice A. Lansing
Acting Secretary

Kathleen Babineaux Blanco
Governor

Date November 3, 2006
Name Elizabeth Girouard
Company Sellers & Associates
Street Address 148B Easy St.
City, State, Zip Lafayette, LA 70506
Project FEMA Hazard Mitigation Grant Program
7th Ward School, Vermillion Parish Police Jury
File No.: 7343-01
Invoice Number 06110302

Personnel of the Habitat Section of the Fur and Refuge Division have reviewed the preliminary data for the captioned project.

The proposed project lies within the designated coastal management zone. Contact Bill Pittman or Rocky Hinds with the Department of Natural Resources Coastal Management Division at 225-342-7591 or 1-800-267-4019 concerning coastal use permits.

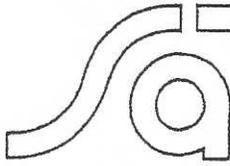
After careful review of our database, no other impacts to rare, threatened, or endangered species or critical habitats are anticipated for the proposed project. No state or federal parks, wildlife refuges, scenic streams, or wildlife management areas are known at the specified site within Louisiana's boundaries.

The Louisiana Natural Heritage Program (LNHP) has compiled data on rare, endangered, or otherwise significant plant and animal species, plant communities, and other natural features throughout the state of Louisiana. Heritage reports summarize the existing information known at the time of the request regarding the location in question. The quantity and quality of data collected by the LNHP are dependent on the research and observations of many individuals. In most cases, this information is not the result of comprehensive or site-specific field surveys; many natural areas in Louisiana have not been surveyed. This report does not address the occurrence of wetlands at the site in question. Heritage reports should not be considered final statements on the biological elements or areas being considered, nor should they be substituted for on-site surveys required for environmental assessments. LNHP requires that this office be acknowledged in all reports as the source of all data provided here. If at any time Heritage tracked species are encountered within the project area, please contact the LNHP Data Manager at 225-765-2643. If you have any questions, or need additional information, please call 225-765-2357.

Sincerely,

Gary Lester, Coordinator
Natural Heritage Program

cc: Bill Pittman



Sellers & Associates, Inc.

ENGINEERS

SURVEYORS

ELIZABETH S. GIROUARD, PRESIDENT
TODD A. VINCENT, VICE PRESIDENT

EUGENE M. SELLERS, PE., P.L.S.
WARREN P. BEEDLE, PE., P.L.S.
TODD A. VINCENT, M.S., PE., P.L.S.
ELIZABETH S. GIROUARD, C.E.
DANA MONTET SIMON, M.S., PE.
LARRY A. CRAMER, PE.
A. DAVID SUIRE, PE.
STEVE A. DRONET, E.I.
JORDAN P. HORNE, E.I.
WILBERT J. GUIDRY, P.L.S.

August 3, 2006

Ms. Debbie A. Fuller, Supervisor
U.S. FISH AND WILDLIFE SERVICE
646 Cajundome Boulevard, Suite 400
Lafayette, Louisiana 70506

RE: Vermilion Parish Police Jury
FEMA Hazard Mitigation Grant Program
7th Ward School
File Number: 7343-01

Dear Ms. Fuller:

The Vermilion Parish Police Jury proposed a retrofitting project utilizing a levee and flood wall to protect the affected public elementary school from flood waters. This project proposes to construct approximately 347 linear feet of levees and 1,494 linear feet of concrete floodwall around the perimeter of the facilities to protect the school from future flooding. This project will also greatly reduce the risk of disruption of school services and the major repair and displacement costs associated with the damages as was incurred with Hurricane Rita. A project map is enclosed showing the location of the proposed project.

In order for this project to be considered for Federal Assistance, the project must be evaluated for environmental impacts. Please review your data to determine if the proposed project may have any impacts on the environment.

A prompt review and response to this inquiry by August 24, 2006, would be greatly appreciated.

Sincerely,

SELLERS AND ASSOCIATES, INC.

Elizabeth S. Girouard
ELIZABETH S. GIROUARD

This project has been reviewed for effects to Federal trust resources under our jurisdiction and currently protected by the Endangered Species Act of 1973 (Act). The project as proposed,
 Will have no effect on those resources
 Is not likely to adversely affect those resources.
This finding fulfills the requirements under Section 7(a)(2) of the Act.
Debbie A. Fuller
Acting Supervisor
Louisiana Field Office
Date August 9, 2006

U.S. Fish and Wildlife Service
D:\CW\73430040-01\7th Ward ltr-Agency080306.wpd
c: Vermilion Parish Police Jury



FEMA

U.S. Department of Homeland Security
Federal Emergency Management Agency
FEMA-1603/1607-DR-LA
Louisiana Transitional Recovery Office
1250 Poydras Street, 14th Floor
New Orleans, LA 70113

December 8, 2008

Scott Hutcheson
State Historic Preservation Officer
Office of Culture Recreation and Tourism
Post Office Box 44247
Baton Rouge, LA 70804

No known historic properties will be affected by this undertaking. This effect determination could change should new information come to our attention.
Scott Hutcheson 12-17-08
Scott Hutcheson Date
State Historic Preservation Officer

RE: Section 106 Review Consultation, Hurricane Katrina

Applicant: Vermilion Parish Government
Undertaking: Retrofit of the Seventh Ward Elementary School, Abbeville, Vermilion Parish (1603-0125)
Determination: No Historic Properties Affected

Dear Mr. Hutcheson:

The Federal Emergency Management Agency (FEMA) will be providing funds authorized under the Robert T. Stafford Disaster Relief and Emergency Assistance Act, P.L. 93-288, as amended, in response to the following major Disaster Declaration:

- 1) FEMA-1603-DR-LA, dated August 29, 2005, as amended.

FEMA is initiating Section 106 review for the above-referenced property in accordance with the Programmatic Agreement between 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. It is proposed that federal funding through FEMA's 404 Hazard Mitigation Grant Program (HMGP) be provided to the Vermilion Parish Government (Applicant) to construct and retrofit the Seventh Ward Elementary School with 347 linear feet of berms and 1,494 linear feet of concrete floodwalls securing the perimeter of the school from future flood loss. This retrofit will meet all applicable FEMA guidelines, the applicable International Building Code, and all other applicable state and local regulations.

The following table summarizes the property that FEMA has reviewed under Section 106 of the National Historic Preservation Act pursuant to the Applicant's funding application:

Locality	Address	Street	Const. Date	Determination		Comments
				Eligible	Not Eligible	
Abbeville	12012	Audubon Road	1967		NE - A, B, C, & G	Less than 50 years of age



FEMA

U.S. Department of Homeland Security
Federal Emergency Management Agency
FEMA-1603/1607-DR-LA
Louisiana Transitional Recovery Office
1250 Poydras Street, 14th Floor
New Orleans, LA 70113

December 8, 2008

Scott Hutcheson
State Historic Preservation Officer
Office of Culture Recreation and Tourism
Post Office Box 44247
Baton Rouge, LA 70804

RE: Section 106 Review Consultation, Hurricane Katrina

Applicant: Vermilion Parish Government
Undertaking: Retrofit of the Seventh Ward Elementary School, Abbeville, Vermilion Parish (1603-0125)
Determination: **No Historic Properties Affected**

Dear Mr. Hutcheson:

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The following table summarizes the property that FEMA has reviewed under Section 106 of the National Historic Preservation Act pursuant to the Applicant's funding application:

Locality	Address	Street	Const. Date	Determination		Comments
				Eligible	Not Eligible	
Abbeville	12012	Audubon Road	1967		NE - A, B, C, & G	Less than 50 years of age

As it is under 50 years of age, FEMA has determined that the structure at the above-noted address is not eligible for listing in the National Register of Historic Places, nor does it contribute to a National Register-listed property or eligible Historic District.

The Area of Potential Effects (APE) for ground disturbing activities is defined as the tax lot boundary for each of the above referenced properties. FEMA has consulted the Louisiana Cultural Resources Map, which represents the SHPO's cultural database, and determined that no known archaeological sites exist within .25 miles of the property. As the undertaking involves significant ground disturbing activities, and no previous survey of the property has been undertaken, a site visit to this property was conducted by FEMA archaeologists David Gilmour and Pam Pyatt, accompanied by LA SHPO archaeology liaison Jason Emery on November 6, 2008. A series of 10 soil samples were taken around the perimeter of the property, concentrating on the areas to be most heavily impacted (please see attached Site Visit Report, Soil Test Results and corresponding Soil Test Location Map). The samples revealed both disturbed and intact soils, however no cultural material or features were revealed. In general, all work on this property will occur within areas of low archaeological probability, and/or be confined to previously disturbed areas.

FEMA has determined that **No Historic Properties will be Affected** by this Undertaking.

Your prompt review of this application is greatly appreciated. Should you have questions or need additional information, please contact David Gilmour, FEMA Archaeologist at (713) 725-5380 or david.gilmour@associates.dhs.gov, or Larry Frey, FEMA Historic Structures Specialist at (337) 281-5331 or larry.frey@associates.dhs.gov.

Sincerely,



for

Marc Roy
Environmental Liaison Officer
FEMA-DR-1603-LA, FEMA-DR-1607-LA

Enclosures

The FEMA/SHPO archaeology liaison concurs with the finding of **No Historic Properties Affected** for the Seventh Ward Elementary School in Vermilion Parish as a result of this Undertaking.

Jason A. Emery, FEMA/SHPO Liaison for Archaeology

Date

The SHPO standing structures reviewer concurs with the finding of **No Historic Properties Affected** for the Seventh Ward Elementary School Gymnasium in Vermilion Parish as a result of this Undertaking.

Mike Varnado, SHPO Reviewer for Standing Structures

Date

SITE VISIT REPORT

NEMIS #:1603-0125

Applicant: Vermilion Parish

Date of Visit: 11/06/08

Staff in Attendance: David Gilmour and Pam Pyatt, FEMA HMGP Archaeologists, Jason Emery, LA SHPO/FEMA Liaison, Shontae Harris and Alicia Hunt, GOHSEP, and Jerome Puyau, Vermilion Parish School Board.

Notes: FEMA conducted a site visit to the Seventh Ward Elementary School in Vermilion Parish on Nov. 6, 2008 to determine the probable impact on potential archaeological resources of an application for retrofit mitigation measures consisting of a combination of a berm and floodwalls around the perimeter of the school property. Also included in the mitigation request is a new pump and drainage system to remove flood water from the school grounds. These measures combine to create substantial ground disturbing activities, with the greatest disturbance relating to the installation of flood walls on three sides of the school. It is anticipated that the floodwalls will require trenching for foundations to a depth twice that of their planned above ground height.

Review of the Louisiana Cultural Resources map shows that no prior survey has been undertaken of this property, and that it is in an ecotone which would be of greater than normal probability for archaeological resources. For these reasons, combined with the substantial ground disturbing activities, it was decided to conduct a site visit with limited subsurface investigation of the soils to be disturbed.

A series of 10 soil probe tests was conducted around the perimeter of the property. These tests revealed that most of the perimeter of the school grounds consists of either disturbed soils or nearly intact soils with their upper pedons truncated by landscaping activities. No artifacts were recovered from any tests nor were any subsurface cultural features revealed, other than activities related to construction of the school itself. In addition, numerous areas of disturbance along the proposed barriers were observed, such as paved and graveled areas, concrete pads for various utilities, and in place drainage systems.

As no cultural material or features were observed and there is extensive disturbance of the planned areas for mitigation measures, FEMA has determined that there are no issues of archaeological significance for this project.

Soil Test Results at Seventh Ward Elementary School, Vermilion Parish, Nov. 06, 2008

<u>Soil Test # (lat/lon)</u>	<u>Depth (cm b.s.)</u>	<u>Soil Description</u>
Soil Test 1 (29.87451/-92.17366)	0 - 6	dark gray brown silt loam
	6 - 45	dark yellowish brown clay loam with strong brown mottles
	45 - 60	yellowish brown clay
Soil Test 2 (29.87496/-92.17290)	0 - 10	dark yellowish brown silty clay loam
	10 - 30	yellowish brown clay loam with strong brown mottles
	30	refusal of soil probe
Soil Test 3 (29.87425/-92.17309)	0 - 25	mixed clayey soils (fill)
	25 - 26	light gray clay
	26	refusal of soil probe
Soil Test 4 (29.87443/-92.17312)	0 - 6	yellowish brown silty clay
	6 - 20	grayish brown clay
	20 - 69	light brownish gray silty clay
Soil Test 5 (29.87451/-92.17366)	0 - 35	brown silty loam (fill)
	35	refusal of soil probe
Soil Test 6 (29.87461/-92.17887)	0 - 70	grayish brown silty loam with weak reddish brown mottles
Soil Test 7 (29.87528/-92.17399)	0 - 6	dark grayish brown silt loam
	6 - 20	dark yellowish brown clay loam
	20 - 25	yellowish brown clay with strong brown mottles
	25	refusal of soil probe

Soil Test Results at Seventh Ward Elementary School, Vermilion Parish, Nov. 06, 2008

<u>Soil Test # (lat/lon)</u>	<u>Depth (cm b.s.)</u>	<u>Soil Description</u>
Soil Test 8 (29.87565/-92.17390)	0 – 8 8 – 30 30 – 64	fine sandy/silty gravels (fill) brown silty clay loam yellowish brown silty clay with strong brown mottles
Soil Test 9 (29.87594/-92.17359)	0 – 10 10 – 20 20 – 56	dark grayish brown silty loam brown sand (fill) grayish brown silty loam with weak reddish brown mottles
Soil Test 10 (29.87584/-92.17297)	0 – 13 13 – 52	dark grayish brown silt loam grayish brown silt loam with reddish brown mottles

Section 106 Review : Soil Test Location Map

NEMIS # 1603-0125

Resource Name: Seventh Ward Elementary School

Resource Address: 12012 Audubon Road, Abbeville, Vermilion Parish, LA 70510-8746



U.S. Department of Homeland Security
Federal Emergency Management Agency

Section 106 Review: USGS Quad Location Map

Map Name: Abbeville West and Intracoastal City (LA), USGS 7.5' Topo Maps

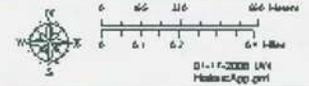
NEMIS # 1603-0125

Address: 12012 Audubon Road, Abbeville, LA

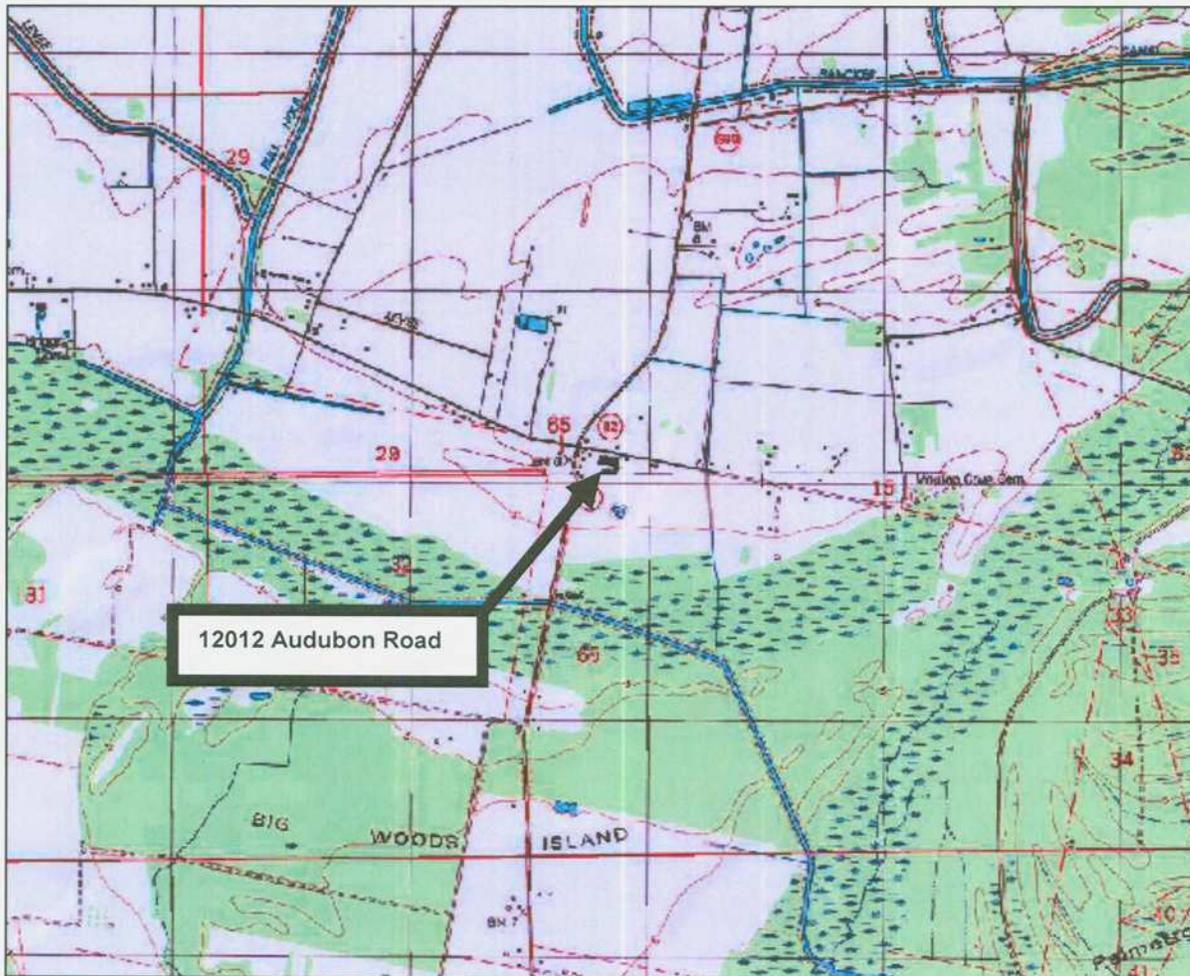
Coordinates: 29.875454/-92.173033



Historic and Archaeological Map



Location Frame



Legend



NOV 6 2008



FEMA

U.S. Department of Homeland Security
DR-1603-LA
1 Seine Court, 4th Floor
New Orleans, LA 70114

February 17, 2009

Ms. Diane Hewitt
Performance Management
LDEQ/Community and Industry Relations
Business and Community Relations
Office of the Secretary
P.O. Box 4301 (602 North 5th Street)
Baton Rouge, LA 70821-4301

Subject: Vermilion Parish Government
Abbeville, Louisiana
Seventh Ward Flood Protection Project
NEMIS # 1603-0125 FEMA-1603-DR-LA

Dear Ms. Hewitt,

FEMA is considering providing Hazard Mitigation Grant Program funding for the attached project in relation to Hurricanes Katrina and Rita (FEMA-1603/1607-DR-LA). Please review the attached project description to determine whether your office has any objections to the proposed project and whether the sub-applicant will need to obtain any permits from your office. In addition, using the LDNR SONRIS database, FEMA is has determined that the proposed project is very close to a non-producing, non-active oil/gas well. The applicant is the Vermilion Parish Government. We would appreciate your comments on this project within fifteen days. If we do not receive comments from you within this time period, we will assume that you have no concerns or issues with the proposed project. If appropriate, FEMA will add the condition that the applicant will be required to obtain applicable permits from your office.

Please contact Laurel Rohrer, Environmental Specialist by phone at (540) 842-3300, by mail at 1 Seine Court, 4th Floor, New Orleans, LA 70114, or by email at laurel.rohrer@associates.dhs.gov with any questions.

Sincerely,

Cynthia Teeter
Environmental Liaison Officer
FEMA 1603/1607-DR-LA

for

Attachments: Project Description Scope of Work
Vicinity Map with Latitude and Longitude
Vicinity Map Showing Approximate Project Footprint and Oil/Gas Well

This project entails construction of a concrete flood wall/earthen berm to reduce the flooding hazard in at the Seventh Ward Elementary School in Abbeville, LA. Please see the scope of work below.

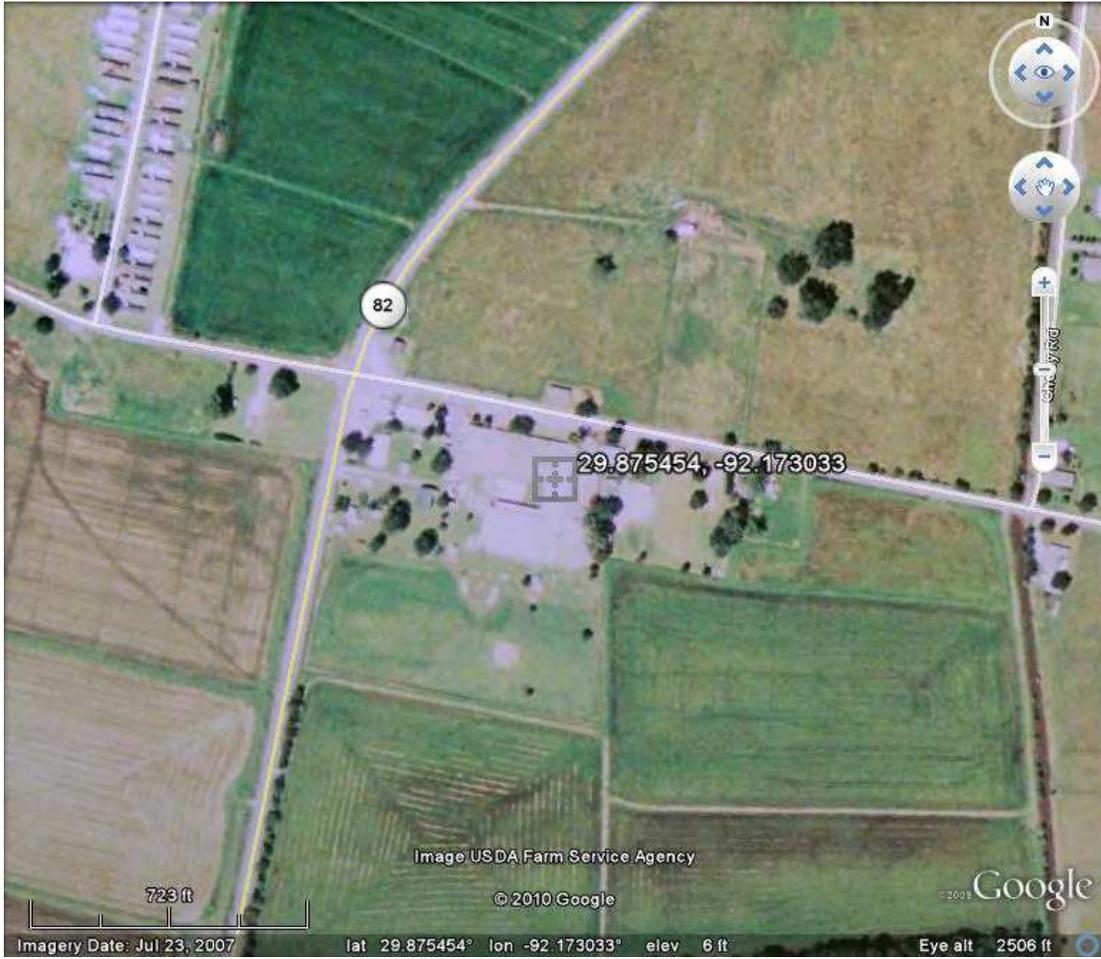
Damage Description:

On September 24, 2005, storm surge caused by Hurricane Rita inundated large portions of southwest Louisiana causing extensive flood damage to structures in Vermilion Parish. The Seventh Ward Elementary School is located at 12112 Audubon Road, Abbeville, LA (29.875454, -92.173033). The proposed project is for construction of an approximately 2,000 linear foot earthen levee/flood wall around the perimeter of the school. The Seventh Ward Elementary School is bounded to the north by Audubon Road, to the east and west by residential structures, and to the south by agricultural fields. According to the SONRIS database, oil/gas well # 63178 is located approximately 350 feet south of the Seventh Ward Elementary School.

Scope of work:

The proposed project is for construction of an approximately 2,000 linear foot earthen levee/flood wall around the perimeter of the school. Dimensions of the earthen levee will be approximately 700 linear feet long by 75 feet wide by 9 feet high and the proposed concrete flood wall will be 1,300 linear feet long by 1 foot wide by 8 feet high, with 5 foot wide earthen embankment on both sides of the wall. The 75 foot wide earthen levee portion will be constructed south of the school structure. The planned activities will provide protection to three (3) feet above the current BFE and 3.8 feet above floodwater levels experienced during Hurricane Rita. The Seventh Ward Elementary School is a critical facility that has suffered repetitive wind damage from various storms. Approximately 9,878 cubic yards of topsoil will be hauled in to construct the earthen levee and approximately 2,921 cubic yards of native material will be excavated/backfilled for the installation of the floodwall and storm drain pipes. The proposed floodwall will require approximately 982 cubic yards of concrete and 1,325 cubic yards of rock/crushed stone for the foundation. The proposed project also includes the installation of a pumping station within the proposed leveed area and a discharge ditch outside of the leveed area. Although it appears that the flood wall/earthen berm will be constructed approximately 200 feet north of the oil/gas well (see attached figure), the area south of the school building will most likely be used for heavy equipment and material staging. In addition, the applicant has indicated that approximately 2,921 cubic yards of native material will be excavated/backfilled for the installation of the floodwall and storm drain pipes. The exact locations that this material may be excavated from have not been provided at this time.

Project Vicinity Map



Vicinity Map Showing Approximate Project Footprint and Oil/Gas Well



From: Diane Hewitt [Diane.Hewitt@LA.GOV]
Sent: Friday, March 12, 2010 9:39 AM
To: 'laurel.rohrer@associates.dhs.gov'
Subject: DEQ SOV: 100217/0305 Seventh Ward
Flood Protection

March 12, 2010

Laurel Rohrer, Environ. Spec.
FEMA TRO - EHP
1 Seine Ct., 4th Floor
New Orleans, LA 70114
laurel.rohrer@associates.dhs.gov

RE: 100217/0305 Seventh Ward Flood Protection
FEMA/HMGP funding
Vermilion Parish

Dear Ms. Rohrer:

The Department of Environmental Quality (LDEQ), Offices of Environmental Services and Environmental Compliance have received your request for comments on the above referenced project. Please take any necessary steps to obtain and/or update all necessary approvals and environmental permits regarding this proposed project.

There were no objections based on the information in the document submitted to us. However, the following comments have been included below. Should you encounter a problem during the implementation of this project, please notify LDEQ's Single-Point-of-contact (SPOC) at (225) 219-3640.

The Office of Environmental Services/Permits Division recommends that you investigate the following requirements that may influence your proposed project:

- If your project results in a discharge to waters of the state, submittal of a Louisiana Pollutant Discharge Elimination System (LPDES) application may be necessary.
- If the project results in a discharge of wastewater to an existing wastewater treatment system, that wastewater treatment system may need to modify its LPDES permit before accepting the additional wastewater.
- LDEQ has stormwater general permits for construction areas equal to or greater than one acre. It is recommended that you contact the LDEQ Water Permit Division at (225) 219-3181 to determine if your proposed improvements require one of these permits.
- All precautions should be observed to control nonpoint source pollution from construction activities.
- If any of the proposed work is located in wetlands or other areas subject to the jurisdiction of the U.S. Army Corps of Engineers, you should contact the Corps directly to inquire about the possible necessity for permits. If a Corps permit is required, part of the application process may involve a water quality certification from LDEQ.
- All precautions should be observed to protect the groundwater of the region.
- Please be advised that water softeners generate wastewaters that may require special limitations depending on local water quality considerations. Therefore if your water system improvements include water softeners, you are advised to

contact the LDEQ Water Permits to determine if special water quality-based limitations will be necessary.

- Any renovation or remodeling must comply with LAC 33:III.Chapter 28.Lead-Based Paint Activities, LAC 33:III.Chapter 27.Asbestos-Containing Materials in Schools and State Buildings (includes all training and accreditation), and LAC 33: III.5151.Emission Standard for Asbestos for any renovations or demolitions.
- If any solid or hazardous wastes, or soils and/or groundwater contaminated with hazardous constituents are encountered during the project, notification to LDEQ's Single-Point-of-Contact (SPOC) at (225) 219-3640 is required. Additionally, precautions should be taken to protect workers from these hazardous constituents.

Currently, Vermilion Parish is classified as an attainment parish with the National Ambient Air Quality Standards.

Please forward all future requests to Ms. Diane Hewitt, LDEQ/Performance Management/ P.O. Box 4301, Baton Rouge, LA 70821-4301, and your request will be processed as quickly as possible.

If you have any questions, please feel free to contact me at (225) 219-4079 or by email at diane.hewitt@la.gov. Permitting questions should be directed to the Office of Environmental Services at (225) 219-3181.

Sincerely,

Diane Hewitt
Performance Management
LDEQ/Community and Industry Relations
Business and Community Outreach Division
Office of the Secretary
P.O. Box 4301 (602 N. 5th Street)
Baton Rouge, LA 70821-4301
Phone: 225-219-4079
Fx: 225-325-8208
E-mail: diane.hewitt@la.gov



FEMA

U.S. Department of Homeland Security
DR-1603-LA
1 Seine Court, 4th Floor
New Orleans, LA 70114

February 17, 2009

Louisiana Department of Natural Resources
Office of Mineral Resources
617 North Third Street, 8th Floor
Baton Rouge, LA 70802

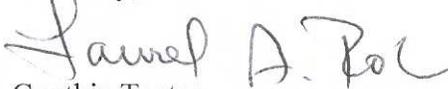
Subject: Vermilion Parish Government
Abbeville, Louisiana
Seventh Ward Elementary School Flood Wall/Berm Project
NEMIS # 1603-0125 FEMA-1603-DR-LA

To Whom It May Concern,

FEMA is considering providing Hazard Mitigation Grant Program funding for the attached project in relation to Hurricanes Katrina and Rita (FEMA-1603/1607-DR-LA). Using the SONRIS database, FEMA is has determined that the proposed project is very close to a non-producing, non-active oil/gas well. Please review the attached project description to determine the required conditions, if any, the applicant must adhere to while performing the proposed work to avoid damage to this well. The applicant is the Vermilion Parish Government. We would appreciate your comments on this project within fifteen days. If we do not receive comments from you within this time period, we will assume that you have no concerns or issues with the proposed project. If appropriate, FEMA will add the condition that the applicant will be required to obtain applicable permits from your office.

Please contact Laurel Rohrer, Environmental Specialist by phone at (540) 842-3300, by mail at 1 Seine Court, 4th Floor, New Orleans, LA 70114, or by email at laurel.rohrer@associates.dhs.gov with any questions.

Sincerely,

For

Cynthia Teeter
Environmental Liaison Officer
FEMA 1603/1607-DR-LA

Attachments: Project Description Scope of Work
Vicinity Map Showing Approximate Project Footprint and Oil/Gas Well

This project entails construction of a concrete flood wall/earthen berm to reduce the flooding hazard in at the Seventh Ward Elementary School in Abbeville, LA. Please see the scope of work below.

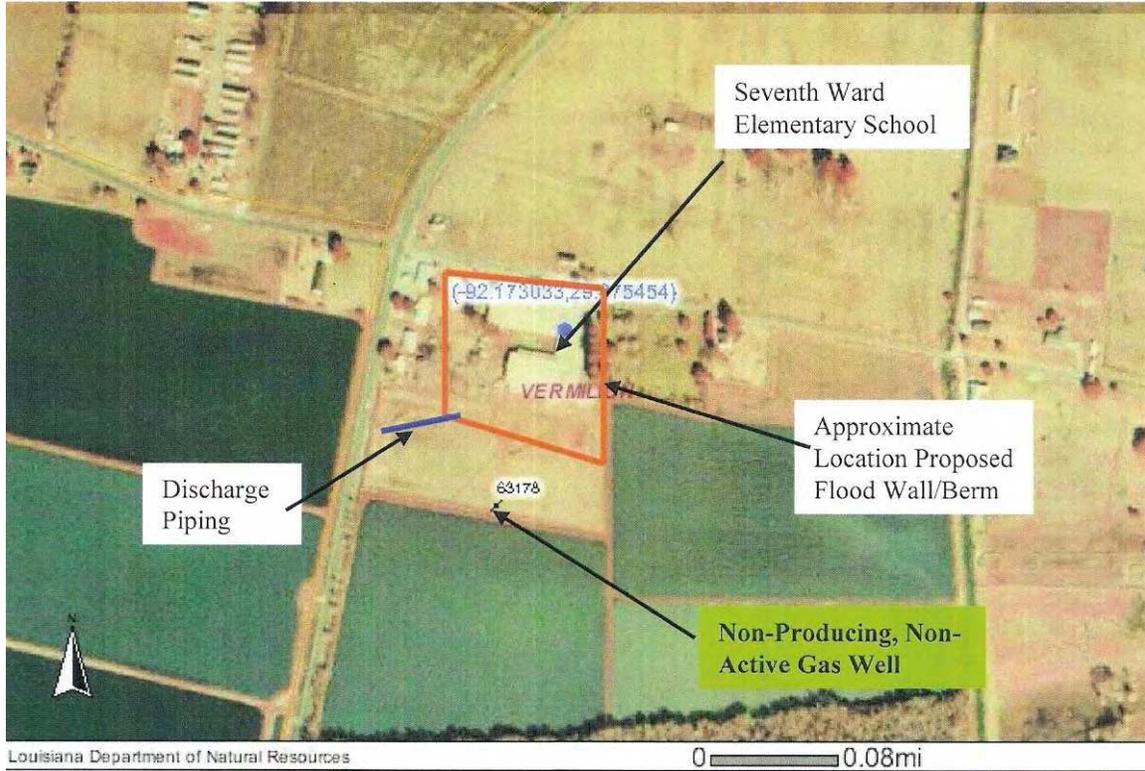
Damage Description:

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Scope of work:

The proposed project is for construction of an approximately 2,000 linear foot earthen levee/flood wall around the perimeter of the school. Dimensions of the earthen levee will be approximately 700 linear feet long by 75 feet wide by 9 feet high and the proposed concrete flood wall will be 1,300 linear feet long by 1 foot wide by 8 feet high, with 5 foot wide earthen embankment on both sides of the wall. The 75 foot wide earthen levee portion will be constructed south of the school structure. The planned activities will provide protection to three (3) feet above the current BFE and 3.8 feet above floodwater levels experienced during Hurricane Rita. The Seventh Ward Elementary School is a critical facility that has suffered repetitive wind damage from various storms. Approximately 9,878 cubic yards of topsoil will be hauled in to construct the earthen levee and approximately 2,921 cubic yards of native material will be excavated/backfilled for the installation of the floodwall and storm drain pipes. The proposed floodwall will require approximately 982 cubic yards of concrete and 1,325 cubic yards of rock/crushed stone for the foundation. The proposed project also includes the installation of a pumping station within the proposed leveed area and a discharge ditch outside of the leveed area. Although it appears that the flood wall/earthen berm will be constructed approximately 200 feet north of the oil/gas well (see attached figure), the area south of the school building will most likely be used for heavy equipment and material staging. In addition, the applicant has indicated that approximately 2,921 cubic yards of native material will be excavated/backfilled for the installation of the floodwall and storm drain pipes. The exact locations that this material may be excavated from have not been provided at this time.

Vicinity Map Showing Approximate Project Footprint and Oil/Gas Well



From: Jeff Wells [Jeff.Wells@LA.GOV]
Sent: Friday, February 19, 2010 15:25
To: 'Laurel.Rohrer@associates.dhs.gov'
Cc: Deborah Wells; James Magee; OOC-Info Conservation Mail; Vicki Brune Simmons
Subject: RE: NEMIS 1603-0125 Seventh Ward Elementary School Flood Wall/Earthen Berm Project Consultation Request

Based on the information provided, there are no special requirements for the Office of Conservation.

Jeff Wells
Permits Section Manager
Office of Conservation
P.O. Box 94275
Baton Rouge, LA 70815
Ph: 225-342-5638
Fax: 225-242-3717
Email: Jeff.Wells@LA.gov

From: James Magee
Sent: Friday, February 19, 2010 2:56 PM
To: Jeff Wells
Cc: Deborah Wells
Subject: FW: NEMIS 1603-0125 Seventh Ward Elementary School Flood Wall/Earthen Berm Project Consultation Request

Jeff – This one is interesting, take a look. Are there any notifications required. Please respond.
Thanks

From: Deborah Wells **On Behalf Of** OOC-Info Conservation Mail
Sent: Wednesday, February 17, 2010 10:20 AM
To: Todd Keating; James Magee
Cc: OOC-Info Conservation Mail; Deborah Wells
Subject: FW: NEMIS 1603-0125 Seventh Ward Elementary School Flood Wall/Earthen Berm Project Consultation Request

Todd or James, Please assist or forward for assistance and cc me and OOC-Mail with your reply. Thank you.

Debby Wells
Receptionist
DNR-Office of Conservation
225.342.5540

From: Vicki Brune Simmons **On Behalf Of** Office of Mineral Resources
Sent: Wednesday, February 17, 2010 10:07 AM
To: OOC-Info Conservation Mail

Subject: FW: NEMIS 1603-0125 Seventh Ward Elementary School Flood Wall/Earthen Berm Project Consultation Request

Please handle this inquiry. Thanks.

From: Rohrer, Laurel (CTR) [mailto:Laurel.Rohrer@associates.dhs.gov]

Sent: Wednesday, February 17, 2010 9:47 AM

To: Office of Mineral Resources

Subject: NEMIS 1603-0125 Seventh Ward Elementary School Flood Wall/Earthen Berm Project Consultation Request

To Whom It May Concern,

Vermilion Parish has submitted an application to FEMA for funding to construct a flood wall/earthen berm and associated drainage improvements at the Seventh Ward Elementary School, located in Abbeville, LA. Using the SONRIS database, FEMA has determined the Seventh Ward Elementary School is very close to a non-producing, non-active oil/gas well. Please review the attached project description to determine the required conditions, if any, the applicant must adhere to while performing the proposed work to avoid damage to this well and/or any required notification to your office that may be required. The project description, location, and scope of work is attached. Please call me at (540) 842-3300 if you have any questions with this project. Thank you in advance for your time and attention to this matter. If mailing you response, please send it to:

Laurel Rohrer
FEMA TRO - EHP
1 Seine Court, 4th Floor
New Orleans, LA 70114

Thank you in advance for your time and attention to this matter.

Laurel Rohrer, CFM, CHMM, REM
URS Corporation, NEPA Environmental Specialist
Contractor Support to the Hazard Mitigation Grant Program
Cell: (540) 842-3300
Email: laurel.rohrer@associates.dhs.gov

Mailing Address:
FEMA TRO
1 Seine Court, 4th Floor, Room 4049
New Orleans, LA 70114

Draft

APPENDIX D

8-STEP PROCESS, DRAINAGE ANALYSIS, AND HYDROLOGY STUDIES

**Executive Order 11988 Floodplain Management
 Executive Order 11990 Wetland Protection
 Eight-Step Planning Process Summary
 FEMA-1603-DR-LA
 Vermillion Parish – 7TH Ward Elementary School Floodwall**

<p>Step 1: Determine whether the Proposed Action is located in a wetland and/or the 1% annual chance floodplain, or whether it has the potential to affect or be affected by a floodplain or wetland. Response: The proposed project is indicated as being in a floodplain (AE or A1-30) in the application. The school is located in the floodplain and needs to be mitigated to reduce or eliminate the flooding experienced at the school.</p> <p>The application provides the required environmental documentations from the compliant federal/state agencies indicating that there would be no adverse effects from the proposed project, however, one of the agency letter from the NRCS did indicate that to levee off an area in the flood plain will result or create a problem in the surrounding residences from displaced waters due to the construction of a floodwall/levee. Since the project is a phased project, phase 1 of the project includes an H and H study to determine the impact of the project to the surrounding residences and on the floodplain. The USACE letter indicated that the proposed site for the project is not in a wetland and therefore not subject to the Corp of Engineer’s jurisdiction. Finally the USEPA letter concludes that the project as proposed, should not have an adverse effect on the proposed site.</p>	<p>Project Analysis: According to the DFIRM Panel No. 022113C 0350, Zone AE (EL.11), Preliminary dated 10/30/08, the project area is within the regulated floodplain. The Proposed action will affect the Floodplain. How do you know this proposed project will affect the floodplain? It may be that the project will not significantly impact the floodplain and the surrounding areas? The actions of the proposed project will be considered through the environmental coordination/consultation by the compliance agency for this type of project as well as the parish floodplain management office (DEQ, USACE). The aforementioned agencies are those who will provide permits or deny them for the project depending of the adverse effect of the proposed project on the environment.</p>
<p>Step 2: Notify public at earliest possible time of the intent to carry out an action in a floodplain or wetland, and involve the affected and interested public in the decision-making. Proposed final meeting with the public after phase 1 is completed.</p>	<p>Project Analysis: Initial Public Notice in the Baton Rouge Advocate, November 9, 2005. The notice indicated that actions would potentially occur in the 100-year floodplain.</p>
<p>Step 3: Identify and elevate practicable alternatives to locating the Proposed Action in a floodplain or wetland. The project is already located in a floodplain. One of the alternatives is to relocate the school to another location away from the floodplain. This action is deemed not cost effective.</p>	<p>Project Analysis: The following alternatives were evaluated: Alternative 1: No Action. Alternative 2: Construct a combination levee/floodwall around the perimeter of the school to provide protection from a 1% annual chance. Dismissed Alternatives:</p>

<p>What is wrong with the dismissed alternatives?</p>	<p>Relocate students to Eaton Park Elementary School – the students are currently at this school, however, there is severe overcrowding. This is causing undue hardship on the students of the school that was not damaged. This is not a feasible long term solution.</p> <p>Relocate Building to a new location – The original damage to this building did not meet the replacement requirements set forth in PAG page 28. Therefore funding from FEMA would not be eligible. The School Board does not have the funds to relocate the school without FEMA assistance.</p> <p>Elevate the School Buildings- This is not cost beneficial. To complete this alternative the existing slab-on-grade school would have to be demolished, elevated with fill, and the school rebuilt on the fill.</p>
<p>Step 4: Identify the full range of potential direct or indirect impacts associated with the occupancy or modification of floodplains and wetlands and the potential direct and indirect support of floodplain and wetland development that could result from the Proposed Action.</p> <p>See the above response in step 1</p>	<p>Project Analysis: <u>Alternative No. 1, No Action:</u> This would entail no flood protection to the existing building nor would it allow the federal government to adequately address the urgency for providing safe educational facilities to Vermilion Parish. The No Action alternative would forego disaster assistance and would not be acceptable to the local community or local interests. Future flood victims would suffer stresses related to disaster displacement, and the students of this school in Vermilion Parish will receive insufficient classroom instruction.</p> <p><u>Alternative 2, the Proposed Action:</u> This would provide flood protection from future floods up to the 1% annual chance event. The school is located in a rural area with light residential and agricultural land, thus the proposed action would have minimum impacts to the floodplain.</p>
<p>Step 5: Minimize the potential adverse impacts to work within floodplains and wetlands to be identified under Step 4, restore and preserve the natural and beneficial values served by wetlands.</p> <p>See the above response in step 1</p>	<p>Project Analysis: Construction of a combination levee/floodwall around the school should have little adverse impacts on the floodplain. The building is surrounded by light residential development and agricultural land.</p>
<p>Step 6: Re-evaluate the Proposed Action to determine: 1) if it is still practicable in light of its exposure to flood hazards; 2) the extent to which it will aggravate the hazards to others; and 3) its potential to disrupt floodplain and wetland values.</p> <p>Will be provided at the end of phase one of the project. Project not located in a wetland per</p>	<p>Project Analysis: The Proposed Action remains practicable based on the construction of a combination levee/floodwall around the school buildings will remove the flood hazards from the school, and have little impact to nearby residents and the floodplain.</p>

<p>USACE.</p>	
<p>Step 7: If the agency decides to take an action in a floodplain or wetland, prepare and provide the public with a finding and explanation of any final decision that the floodplain or wetland is the only practicable alternative. The explanation should include any relevant factors considered in the decision-making process.</p> <p>Will be provided at the end of phase one of the project.</p>	<p>Project Analysis: A public notice will be made based on the decision to proceed with the Proposed Action. At a minimum, this notice shall state a reason for locating the Proposed Action in the floodplain; a description of all significant facts considered; a statement indicating whether the action conforms to state and local floodplain protection standards; and a statement indicating how the action affects the wetlands and how mitigation is achieved. The notice will allow the public a chance to comment.</p>
<p>Step 8: Review the implementation and post-implementation phases of the Proposed Action to ensure that the requirements of the Executive Orders are fully implemented. Oversight responsibility shall be integrated into existing processes.</p> <p>This a post implementation documentation</p>	<p>Project Analysis: This step is integrated into the NEPA process and FEMA project management and oversight functions.</p>

DRAINAGE ANALYSIS

7th Ward Elementary School – Flood Control

For

**Vermillion Parish Police Jury
Abbeville, Louisiana**

June 2009

GENERAL INFORMATION

As a direct result of the coastal flooding due to hurricanes Rita and Katrina, this project proposes the retrofit construction of an embankment and flood wall to protect the 7th Ward elementary school from flood waters. A combination of approximately 350 linear feet of earthen embankment and 1500 linear feet of concrete flood wall comprise the flood control perimeter that will protect the school from future flooding. The project also includes a rework of the internal storm water drainage system and the addition of a wet well containing two, ten-horsepower pumps to adequately route the one percent storm from the school property without flooding the existing building.

The 7th Ward Elementary School is located in Vermillion Parish south of Abbeville, Louisiana in Section 65, Township 13 South, and Range 3 East. The school address is 12012 Audubon Road. The site contains approximately four acres and the lies within the Vermillion Bay coastal basin. The U.S. Department of Homeland Security's Federal Emergency Management Agency (FEMA) has placed the Advisory Base Flood Elevation (ABFE) of the site at an elevation of 11 feet in zone AE as depicted on the Advisory Base Flood Elevation Map; Vermillion Parish; Map Number LA-AA56 published March 16, 2006. The proposed flood wall and associated embankment will be constructed to a finish elevation of 12 feet resulting in one foot of freeboard above the ABFE. The existing surface elevations on the property range from two feet to seven feet above mean sea level. The soils are predominantly comprised of poorly drained, silt loams (Patoutville).

The SCS method was used for the surface drainage design analysis. This analysis is based on computations, methods and data from Urban Hydrology for Small Watersheds (June 1986), Technical Release Number 55 (TR-55), U.S. Department of Agriculture, Soil Conservation Service, and LADOTD Hydraulics Manual dated March 1997. The analysis was compiled by the use of XP-SWMM (XP-STORM) software.

DESIGN CONSIDERATIONS

Hydrological

The existing site with the general drainage area, flow patterns, hydrologic information, and input data used in the analysis are shown on the attached drawing labeled “Design Drainage Map”.

The existing site conditions are summarized as follows:

Method of Analysis: Soil Conservation Service (S.C.S.)

Design Storms: 10 & 100-yr storm events, 24-hour rainfall = 8.8” & 13.2”

Table 1- Drainage Areas

DA #	Acres	Pervious Area Curve Number	Condition	Time of Concentration min	Shape Factor
1	0.125	90	Roof, Pavement, and Grass	7	323
2	0.180	90	Roof, Pavement, and Grass	10	323
3	0.223	90	Roof, Pavement, and Grass	12	323
3A	0.030	90	Roof, Pavement, and Grass	6	323
4	0.019	90	Roof, Pavement, and Grass	5	323
5	0.154	98	Roof and Pavement	6	323
6	0.127	98	Roof and Pavement	6	323
7	0.165	98	Roof and Pavement	6	323
8	0.184	98	Roof and Pavement	6	323
9	0.391	90	Roof, Pavement, and Grass	22	323
10	0.118	80	Primarily Grass Open Area	13	323
11	0.296	90	Roof, Pavement, and Grass	15	323
12	0.427	90	Roof, Pavement, and Grass	11	323
13	0.213	90	Roof, Pavement, and Grass	12	323
14	0.451	98	Roof and Pavement	6	323
15	0.139	80	Primarily Grass Open Area	14	323
16	0.109	80	Primarily Grass Open Area	11	323
17	0.373	80	Primarily Grass Open Area	18	323
18	0.920	80	Primarily Grass Open Area	35	323
19	0.178	90	Roof, Pavement, and Grass	10	323
E24	0.046	98	Roof and Pavement	6	323
E25	0.027	98	Roof and Pavement	6	323
E26	0.030	98	Roof and Pavement	6	323
E27	0.031	98	Roof and Pavement	6	323
E28	0.011	98	Roof and Pavement	6	323
E29	0.021	98	Roof and Pavement	6	323
E30	0.022	98	Roof and Pavement	6	323
E31	0.048	90	Roof, Pavement, and Grass	10	323

Network

The drainage network consisting of inlets, pipes and pumps is illustrated on the “Design Drainage Map”. The following indicates the inlet and pipe characteristics.

Table 2- Network Data

7th WARD--DRAINAGE PIPES			7th WARD--DRAINAGE INLETS		
Pipe Structure	Pipe Diameter (inches)	Pipe Length (feet)	Inlet Structure No.	Top Elevation	Invert Elevation
P1	12	90	DI#1	6.30	4.30
P2	15	60	DI#2	6.20	4.09
P3	18	82	DI#3	6.20	3.95
P3A	18	35	DI#3A	6.20	3.86
P4	18	56	DI#4	6.20	3.81
P5	24	70	DI#5	6.00	3.25
P6	24	65	DI#6	5.60	2.85
P7	24	75	DI#7	5.60	2.77
P8	24	145	DI#8	5.60	2.60
P9	24	90	DI#9	4.50	1.50
P10	24	100	DI#10	3.75	1.00
P11	24	120	DI#11	3.50	0.75
P12	18	125	DI#12	5.80	3.55
P13	18	60	DI#13	5.50	3.20
P14	18	85	DI#14	5.30	3.00
P15	18	70	DI#15	5.00	2.40
P16	24	95	DI#16	4.50	1.75
P17	24	50	DI#17	3.75	0.75
P18	30	45	DI#18	3.00	0.25
P19	30	65	DI#19	5.70	3.50
P19A	12	55	DI#E24*	6.10	4.92
PE24*	12	35	DI#E25*	6.20	4.92
PE25*	12	35	DI#E26*	6.20	4.81
PE26*	12	33	DI#E27*	6.10	4.78
PE27*	12	11	DI#E28*	6.20	4.70
PE28*	12	11	DI#E29*	6.20	4.69
PE29*	12	24	DI#E30*	6.10	4.68
PE30*	12	11	DI#E31*	6.10	4.63
PE31*	12	122	* EXISTING		

Model Scenarios

In order to consider worst case drainage scenarios, two model conditions were examined. One case examined the utilization of two, ten-horse power pumps to pump during the 10-year and 100-year, 24-hour rainfall event. This case did not provide any gravity outfalls. The second case considered routing the two rainfall events (10-year and 100-year) through a 30-inch diameter storm drainage pipe outfall without supplemental pumping. The objective was to route the peak of both storms in both conditions without causing backwater flooding that was higher than the existing finished floor elevation (6.88 ft.) of the school building.

Hydraulics

All pipes in the network were assumed to have a Manning's roughness coefficients of $n = .014$ with the exception of the $n = .012$ for P18 that is reinforced concrete. Drainage inlet DI#18 has been modeled as a node that has storage capacity above the crest of the inlet. Below is the stage storage relationship at DI#18.

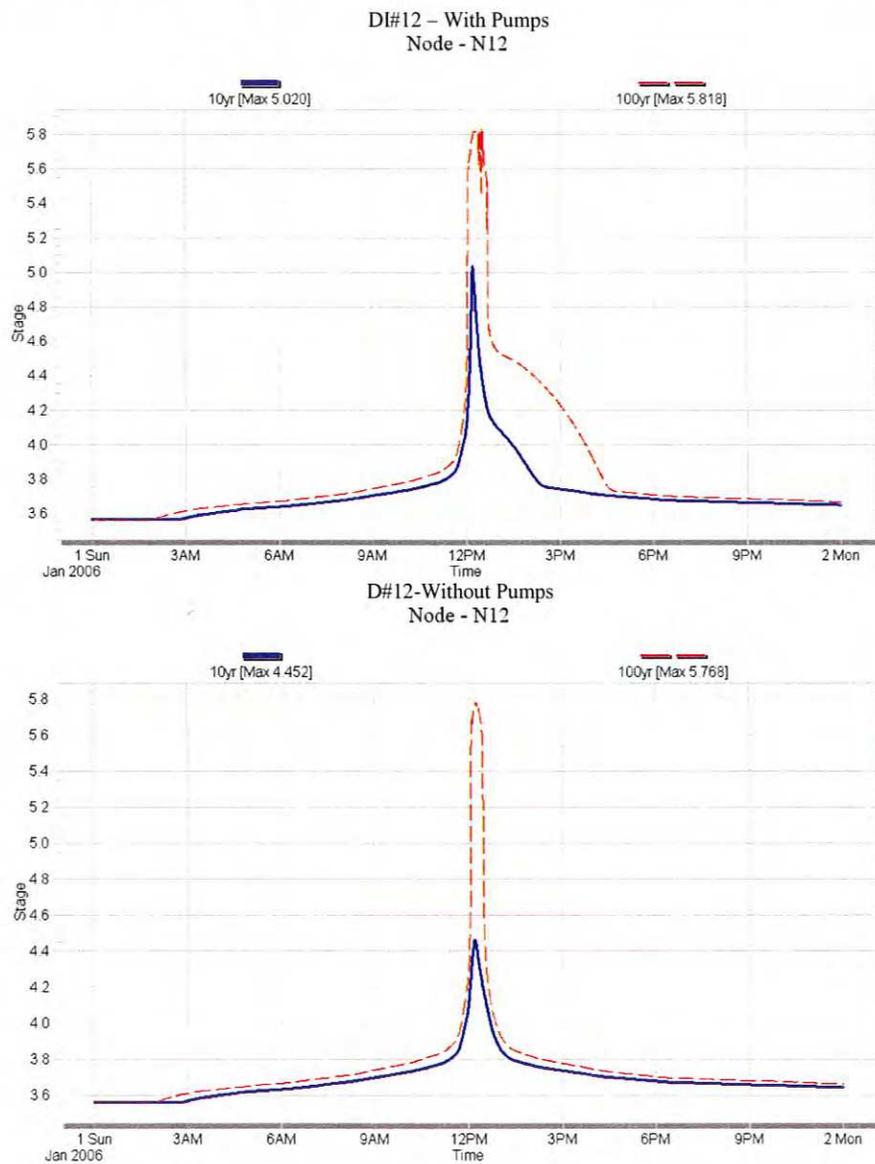
Table 3 – Stage Storage at DI#18

Stage / Storage			
Elevation (feet)	Volume Below (cu yds)	Volume Difference (cu ft)	Area (acres)
3.0	0	0	0.000
3.5	225.9	6099.3	0.560
4.0	783	15041.7	1.381
4.5	1532.1	20225.7	1.857
5.0	2457.8	24993.9	2.295
5.5	3553.1	29573.1	2.716
6.0	4918.2	36857.7	3.384
6.5	6854.9	52290.9	4.802

Entrance losses at each of the pipe inlets were considered to be negligible. The pumps selected for installation at the wet well are two, ten horsepower, ten-inch, electric Lo-Lift™ pumps. The pumps will operate automatically. Each one actuated by level sensors located at different turn-on and shut off elevations. For Pump #1 turn on and shut off elevations are at 2.0 feet and 0.0 feet respectively. Pump #2 is designed to start at elevation 3.0 feet and turn off at elevation 1.0 feet. For modeling the wet well was assumed to be at an initial elevation of 0.0 or with no storage available. Dynamic head losses were calculated and by utilizing the manufacturer's pump curves, pump speeds and efficiencies at differing pumping stages were determined.

Hydraulics (cont.)

Through the modeling exercise, it was evident that some flooding at individual drainage inlets would occur in routing the 100-year event. Drainage inlets DI#9, DI#10, DI#11, DI#12, DI#13, DI#14, DI#15, DI#16, DI#17, DI#18 and DI#19 were allowed to flood in the model. Flood water from drainage inlets DI#9, DI#10, DI#11, DI#17 immediately up-drainage from DI# 18 was routed through shallow channels to simulate conveyance from said inlets to the DI#18 storage inlet. In the worst case, the DI#12 flooded elevation during the peak of the 100-year event was 5.82 feet. The resultant peak elevation leaves over one foot of freeboard to the finished floor elevation of 6.88 feet. All other flooded elevations were less than DI#12 in both scenarios.



RESULTS

As a result of modeling both scenarios, the designed drainage network will route the 10-year and 100-year events without flooding the existing school building. The table below indicates the peak discharge rates in both scenarios. The discharge velocities are high enough that riprap will be installed at the outfall point to alleviate potential erosion.

Table 4- Discharge Summary

Discharge Summary @ Outfall		
Design Storm	Discharge (cfs)	
	Without Pumps	With Pumps Only
10-year	22.33	8.66
100-year	28.91	9.27

In low rainfall events, the 30-inch diameter gravity outfall pipe will route runoff out of the network without the pumps operating. When flooding occurs, the sluice gate at the end of the gravity outfall pipe will be closed and the pumping system will route all storm water captured in the network. As part of the standard operating procedure, the pumps will periodically be activated manually to vacate residual water in the system and to test reliability of the pumps.

Respectfully submitted,

ALAN S. JARE, P.E., CPESC
SELLERS & ASSOCIATES, INC.





An employee-owned company

August 31, 2009

Eugene M. Seller, PE
Sellers & Associates, Inc.
148-B Easy Street
Lafayette, LA 70506-3095

**Subject: Potential Impact on Floodplain Elevations from the Proposed
Levee/Floodwall at the 7th Ward Elementary School Vermilion Parish, LA**

Dear Mr. Sellers:

Attached is PBS&J's evaluation of the potential impacts of construction of the proposed ring levee/floodwall at the 7th Ward Elementary School on the surrounding floodplain elevation. We have evaluated the project on both qualitative and semi-quantitative bases. Please note that we have not evaluated the potential effects of storm-surge circulation or wave dynamics in the immediate vicinity of the school. Therefore our evaluation is limited to the potential effects on the surrounding areal flood elevation. Based on our evaluation, we conclude that construction of the hazard mitigation measure will not have a significant impact on the surrounding floodplain elevation. The details of our evaluation are in the attached document.

Should you have any questions or require additional information, please feel free to contact me at 504-841-2226, extension 225, or on my mobile number at 504-715-8563.

Sincerely,

A handwritten signature in black ink, appearing to read 'Donald B. Boyle', with a long horizontal line extending to the right.

Donald B. Boyle, PE
Project Director

**Potential Impact on Floodplain Elevations from the
Proposed Levee/Floodwall at 7th Ward Elementary School
Vermilion Parish, LA**

PBS&J has been retained by Sellers & Associates, Inc. of Lafayette, LA to evaluate the potential impacts, on the surrounding base flood elevation, of a proposed ring levee/floodwall to be constructed at 7th Ward Elementary School in Vermilion Parish, LA. This evaluation was requested in support of a hazard mitigation project at the school being conducted in accordance with Federal Emergency Management Agency (FEMA) guidelines.

Scope and Objective

In order to approve the proposed hazard mitigation measure, FEMA has required that the Vermilion Parish School Board demonstrate there will be no significant impact of levee/floodwall construction on the surrounding 100-year base flood elevation. Such an assessment is required in areas where reduced storage, impediments to drainage, or other hydraulic affects could adversely impact flood elevations in the surrounding areas. Based on PBS&J experience elsewhere, FEMA typically requires the impacts of construction in a floodplain to be less than a 0.5 foot increase for the effective base flood elevation. However, FEMA and local floodplain administrator may impose tighter restrictions in some locations. In preparation of this assessment, PBS&J has not discussed site-specific restrictions for Vermilion Parish or for the 7th Ward School site. Therefore, PBS&J has assumed that the 0.5-foot maximum increase in base flood elevation will be applied here.

The scope of the following assessment is to provide a qualitative and semi-quantitative analysis of the potential impacts of the ring levee/floodwall on the surrounding flood plain. This analysis relies on a qualitative evaluation of the forces that cause flooding during a storm surge in coastal environments, and also utilizes basic quantitative calculations of flood volume and storage in the vicinity of the site. This analysis does not contain a rigorous numerical analysis of the potential effects of storm-surge circulation or wave dynamics in the vicinity of the school. However, given the physical conditions at the site, such numerical analysis may not be required to assess whether there would be significant adverse affect on the surrounding base flood elevation. In short, the objective is to determine whether the potential impacts are sufficient enough to warrant more rigorous quantitative numerical analysis.

This evaluation was prepared by Harley S. Winer, PhD, PE. Dr. Winer is a professional hydraulic and coastal engineer with 18 years experience working on coastal issues in Louisiana. Dr. Winer is a licensed professional engineer in the State of Louisiana.

Site Description and Background

The 7th Ward Elementary School in Vermilion Parish, Louisiana is located on Audubon Road approximately three miles northeast of Esther, La. and six miles south of Abbeville, La. The school is about 20 miles inland from the Gulf of Mexico shoreline and ten miles inland from Vermillion Bay which is connected to the Gulf of Mexico. The area is rural and sparsely populated. The nearest neighboring buildings are several hundred feet away. The land surrounding the school is predominantly agricultural. The terrain is relatively flat. The school is located entirely within the coastal 100-year floodplain.

The 7th Ward Elementary School was flooded by storm surges caused by Hurricane Rita during the days following landfall of the hurricane on September 24, 2005. Several of the buildings that

comprise the school were flooded by up to 4 feet of water, and remained flooded for a period of several days. The flooding caused extensive damage to the school, and caused long-term disruption in school service to residents in the area.

Proposed Hazard Mitigation Measure

A ring levee/floodwall is proposed as a hazard mitigation measure to surround the school campus and thus reduce the risk of storm surge inundation at the school. The area to be enclosed by the levee/floodwall is approximately 5 acres. The approximate dimensions of the rectangular area to be protected are 400 by 550 feet.

Qualitative Assessment of Riverine versus Storm Surge Flooding

The requirement to evaluate the effects of construction in the floodplain on surrounding flood elevations is very relevant for floodplains located along rivers and streams. With a riverine flood event, there is a given quantity of water (i.e. the discharge resulting from the volume of rainfall runoff) that must be contained within a finite area of land, or storage area. The depth of flooding is a function of the storage area and the rates of inflow and outflow that enter and leave the storage area. If the finite storage area is reduced through the construction of a new facility, or by raising a portion of the floodplain, then the height of flood level in the decreased storage area will be increased. Imagine pouring a given quantity of water from a 10-inch diameter pot into an 8-inch diameter pot (which has a smaller storage area). The height of water in the smaller pot will be higher than in the larger pot. Similarly, a significant decrease in the floodplain area caused by construction activity can result in higher flood elevations for a given riverine flood event.

However, there is a fundamental difference between flooding resulting from an extreme riverine event and coastal flooding resulting from a storm surge. With a coastal storm surge event, there is a virtually infinite amount of water available and the water level will rise to fill the coastal floodplain to a height that is driven by the atmospheric pressure deficit, the wind stress on the water surface, and the wave radiation stresses (which are generally proportional to the wind stress). Other factors such as the roughness and slope of the ground surface (especially when the water depth is shallow), and the duration of the event will also influence the water level. Wind stress on shallow water produces a slope of the water surface. This slope of the water surface is proportional to the strength of the wind. This slope over distance results in elevated water levels and higher waves. The height of the water is a function of the slope of the water and the distance of the slope, as well as other factors such as duration and roughness. Having minor changes in the coastal floodplain storage area or volume will not change the global slope of the water surface and thus will not change the overall height of the storm surge. Likewise the reduced pressure within the center of a storm system will produce a global water surface elevation increase that is totally independent of the local storage area.

Semi-Quantitative Analysis of Base Flood Elevation Change

Even though the mechanisms that determine flood elevations in coastal regions are fundamentally different than in riverine areas, as described above, a simplified quantitative volumetric calculation can also be used to demonstrate that the effects of constructing the ring levee/floodwall will have minimal or insignificant impact on the surrounding base flood elevation. The 7th Ward Elementary School site on Audubon Road is 10 miles from Vermillion Bay. In order for this area to get flooded, the width of the storm surge would be at least 10 miles

wide (a very conservative estimate) so that there would be essentially a 100-square mile coastal floodplain between the coast and the school. 100 square miles is equal to 64,000 acres. The proposed new levee/floodwall is to enclose an area of approximately 5 acres. Thus mathematically, construction of the ring levee/floodwall reduces the storage area by less than 0.01 percent. This is based on the simplified assumption that the loss of storage is evenly distributed over the remaining area of the floodplain. In other words, for each foot of flooding reduction at the school there would be a less than 0.0001 foot increase on average over the 100-square mile floodplain. For example, using this simplified calculation, a 5-foot deep flood would result in a less than 0.0005 ft rise on average in the surrounding 100-square mile flood elevation. Again, this simplified calculation imposes a conservative assumption that the floodwaters are contained within a 100 square mile storage area.

Limitations and Exceptions

We have evaluated the effects of the proposed ring levee/floodwall construction on the surrounding base flood elevation using both a qualitative and a simplified, semi-quantitative approach. As indicated above, this approach is not a rigorous numerical modeling effort that might be warranted if the potential change in flood elevation were significant. Also, this approach does not account for potential local effects in the immediate vicinity of the levee/floodwall that could be caused by circulation flow dynamics and/or wave action. However, based on our understanding of surge flooding in coastal environments, any circulation or wave effects in shallow surge water 10 miles from the coast – if measurable at all – would be limited to within a few feet of the levee/floodwall. This is supported by anecdotal evidence from Hurricane Rita, in which the surge that caused flooding at the 7th Ward Elementary School site did not reach the school until several hours after the storm had passed, and was characterized by a relatively slow rise in water elevation. Hurricane Rita also resulted in shallow water depths at the project site that physically cannot support large waves.

Conclusions and Recommendations

Based on PBS&J's evaluation and assumptions, it is anticipated that the construction of the ring levee/floodwall at 7th Ward Elementary School would not result in a significant increase in the surrounding base flood elevation. It is more likely that the resulting base flood elevation change, if even measurable, would be several orders of magnitude less than 0.5 foot. If 0.5 foot is the criterion to be used for changes in the surrounding base flood elevation, and if changes in the surrounding global base flood elevation is the only criterion to be used to determine if the levee/floodwall may be built, then more rigorous numerical analysis or modeling is probably not warranted.

Draft

APPENDIX E
PUBLIC NOTICE

PUBLIC NOTICE

FEMA NOTICE OF AVAILABILITY DRAFT ENVIRONMENTAL ASSESSMENT DRAFT FINDING OF NO SIGNIFICANT IMPACT SEVENTH WARD ELEMENTARY SCHOOL FLOOD PROTECTION EMBANKMENT PROJECT ABBEVILLE, VERMILION PARISH, LOUISIANA

Interested parties are hereby notified that the Federal Emergency Management Agency (FEMA) has prepared a draft Environmental Assessment (EA) and draft Finding of No Significant Impact (FONSI) in compliance with the National Environmental Policy Act (NEPA). The purpose of the EA and FONSI is to assess the effects on the human and natural environment from the construction of a concrete flood wall and earthen berm for flood protection around the Seventh Ward Elementary School on Audubon Road, Abbeville, LA, a proposed action for which FEMA is considering providing funding assistance.

The purpose of the draft EA is to analyze the potential environmental impacts associated with construction of the flood protection concrete flood wall and earthen berm. The draft EA evaluates a No Action Alternative and the Proposed Action, which is to construct the flood protection concrete flood wall and earthen berm around the Seventh Ward Elementary School building. The FONSI will be FEMA's finding that the proposed action will not have a significant effect on the human and natural environment, if no additional substantive information is discovered during the comment period.

The location of the site is 12012 Audubon Road, Abbeville, LA, 70510, Vermilion Parish. The proposed action involves constructing a ring concrete flood wall and earthen berm around the Seventh Ward Elementary School building. The Seventh Ward Elementary School was constructed in 1968, and an addition was constructed on the east side of the original structure. The Seventh Ward Elementary School was constructed on grade, and is located in the floodplain. The Seventh Ward Elementary School flooded during Hurricane Rita.

A draft EA was written to evaluate the proposed action's potential impacts on the human and natural environment. The draft EA summarizes the purpose and need, affected environment, and potential environmental consequences associated with the proposed action and alternatives.

The draft EA and draft FONSI are available for public review at Vermilion Parish Library (Abbeville Branch) – 405 East St. Victor Street, Abbeville, Louisiana 70510, from 9:00 a.m. to 8:00 p.m., Monday and Thursday; 9:00 a.m. to 5:30 p.m., Tuesday, Wednesday, and Friday; and 9:00 a.m. to 1:00 p.m., Saturday. The documents can also be downloaded and viewed from FEMA's website at www.fema.gov/plan/ehp/envdocuments/ea-region6.shtm.

The Public comment period will begin on Tuesday, June 29th and will end on Tuesday, July 13th at 4 pm.

Comments on the proposal may be mailed to:

DEPARTMENT OF HOMELAND SECURITY
Federal Emergency Management Agency
Environmental/Historic Preservation Department
Seventh Ward Elementary School Flood Protection Project
1 Seine Court, 4th Floor, Office 4049
New Orleans, Louisiana 70114

Comments may also be emailed to: FEMA-NOMA@dhs.gov or faxed to: 504-762-2353. Verbal comments will be accepted at 504-762-2205 between the hours of 7:30 a.m. and 4:00 p.m.

If no substantive comments are received, the draft EA and associated Finding of No Significant Impact (FONSI) will become final and this initial Public Notice will also serve as the final Public Notice for work in the floodplain in accordance with 44 CFR Part 9.12.