

Draft Environmental Assessment

Stallings Center and Pool

City of New Orleans
FEMA-1603-DR-LA

Orleans Parish, Louisiana
August 2011

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



FEMA

LIST OF ACRONYMS

| | |
|-----------|---|
| ABFE | Advisory Base Flood Elevation |
| ACM | Asbestos-Containing Material |
| APE | Area of Potential Effect |
| BMPs | Best Management Practices |
| CAA | Clean Air Act |
| CBRA | Coastal Barrier Resources Act |
| CBRS | Coastal Barrier Resources System |
| CEQ | Council on Environmental Quality |
| CERCLA | Comprehensive Environmental Response, Compensation, and Liability Act |
| CFR | Code of Federal Regulations |
| CPC | City Planning Commission |
| CWA | Clean Water Act |
| CZMA | Coastal Zone Management Act |
| DFIRM | Digital Flood Insurance Rate Map |
| EA | Environmental Assessment |
| EIS | Environmental Impact Statement |
| USEPA | United States Environmental Protection Agency |
| EO | Executive Order |
| ESA | Endangered Species Act |
| EDMS | Electronic Document Management System |
| FEMA | Federal Emergency Management Agency |
| FONSI | Finding of No Significant Impact |
| HEAG | Highest Existing Adjacent Grade |
| LADOTD | Louisiana Department of Transportation and Development |
| LA GOHSEP | Louisiana Governor's Office of Homeland Security and Emergency Preparedness |
| LDEQ | Louisiana Department of Environmental Quality |
| LDNR | Louisiana Department of Natural Resources |
| LUST | Leaking Underground Storage Tank |
| NAAQS | National Ambient Air Quality Standards |
| NEPA | National Environmental Policy Act |
| NFIP | National Flood Insurance Program |
| NHPA | National Historic Preservation Act |
| NMFS | National Marine Fisheries Service |
| NOAA | National Oceanic & Atmospheric Administration |
| NRCS | Natural Resources Conservation Service |
| NWI | National Wetland Inventory |
| OSHA | Occupational Safety and Health Act |
| RECAP | Risk Evaluation/Corrective Action Program |
| RCRA | Resource Conservation and Recovery Act |
| RHA | Rivers and Harbors Act |
| SHPO | State Historic Preservation Office/Officer |
| US | United States |
| USACE | United States Army Corps of Engineers |

| | |
|-------|---|
| USC | United States Code |
| USDA | United States Department of Agriculture |
| USFWS | United States Fish and Wildlife Service |
| USGS | United States Geological Survey |

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1.0 INTRODUCTION

1.1 Project Authority

Hurricane Katrina made landfall on August 29, 2005 near Buras-Triumph, Louisiana as a Category 3 storm with sustained winds of more than 125 mph. President George W. Bush declared a major disaster for the State of Louisiana (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. This is pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), PL 93-288, as amended. Section 406 of the Stafford Act authorizes FEMA's Public Assistance (PA) Program to assist in funding the repair, restoration, reconstruction, or replacement of public facilities damaged as a result of the declared disaster.

This 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 (Title 40 of the Code of Federal Regulations [CFR] Parts 1500 to 1508), and FEMA's regulations implementing NEPA (44 CFR Parts 9 and 10).

The purpose of this EA is to analyze potential environmental impacts of the proposed project. FEMA will use the findings in this EA to determine whether to prepare an Environmental Impact Statement (EIS) or a Finding of No Significant Impact (FONSI).

1.2 Background

The Stallings Center and Pool in Orleans Parish sustained major damage as a result of Hurricane Katrina and it was deemed eligible by FEMA for federal disaster public assistance as a non-critical private non-profit organization serving the needs of the general public.

The Stallings Center and Pool was located at the corner of North Rampart and Lesseps Street, Latitude 29.96433, Longitude -90.03276 (Figures 1 and 2). This facility consisted of a 2-story, 13,072 square foot brick structure, built in 1948. The building had a gymnasium and several community activity rooms. Water damage occurred due to failure of the roof enclosure and decking throughout the building. Due to the extended period of time the building sat after the disaster, mold was evident in large portions of the drywall and plaster on lath walls. Adjacent to the center is a fenced pool and associated structures. The City of New Orleans is performing repairs on this site, such as replacing the 8 foot chain link fencing and gates enclosing the swimming pool site, repairing damaged area of exterior CMU walls, holes in CMU where ramp railing was ripped out of the wall, and metal chain link mesh over the steel structure over the swimming pool area, and replacing the railing for accessibility ramp at north end of pool buildings.



Figure 1 Orleans Parish, Louisiana (Google Images, 2011)

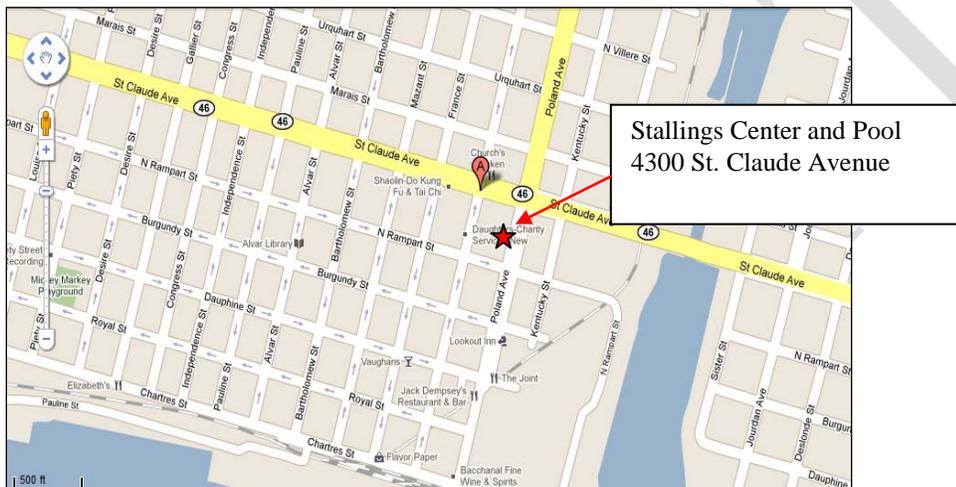


Figure 2 - Stallings Center and Pool Reconstruction Location (Google Maps®, 2010)

2.0 PURPOSE AND NEED

Prior to Hurricane Katrina, the Stallings Center served as neighborhood recreation center that offered various activities for the members of the surrounding community. Due to damages sustained from Hurricane Katrina, the gymnasium was demolished on April 15th, 2010. FEMA approved demolition and replacement of this facility on January 15, 2010.

The objective of FEMA’s PA Grant Program is to provide assistance to State, Tribal and local governments, and certain types of Private Nonprofit organizations so that communities can quickly respond to and recover from major disasters or emergencies declared by the President. The Stallings Center offered residents a place to congregate, lift weights, play basketball/volleyball, swim, play bingo, or take classes such as ballet and ceramics. These essential recreational community services provided by the Stallings Center were lost as a result of Hurricane Katrina. Restoration of essential recreational services in a location that best serves the local community is needed for FEMA PA to achieve its objective.

3.0 ALTERNATIVES

The NEPA process consists of an evaluation of the environmental effects of a federal undertaking including its alternatives. Three alternatives have been proposed and reviewed including, 1) the No Action Alternative, 2) Reconstruction of the Stallings Center and Pool at the original site, and 3) Reconstruction of the Stallings Center and Pool at the Proposed Alternate Location at 4300 St. Claude Avenue (Figures 3 and 4).

3.1 Alternative 1 - No Action

Implementation of the No Action Alternative would entail no repair, reconstruction, or relocation of the Community Center. Consequently, the community would be deprived of the benefits of this public facility and damaged facilities would continue to present hazards to the community. No Action would forego opportunities for reconstruction and recompense.

3.2 Alternative 2 – Reconstruction at the Original Site

This alternative would reconstruct/repair the damaged Stallings Center and Pool eligible facilities on the original site to the pre-disaster configuration, function and capacity in substantially the same footprint, which would restore the essential community service as it existed prior to Hurricane Katrina. This alternative meets the purpose and need of the action. The City of New Orleans has proposed relocation directly adjacent to the original structure based on the current location's conflict with local zoning ordinances. Per 40 CFR 1502.14(c) and the Council on Environmental Quality (CEQ) Forty Questions 2(b), a potential conflict with local law does not render an alternative unreasonable, although such conflicts must be considered. This alternative and its impacts will therefore be evaluated throughout this Environmental Assessment.

3.3 Alternative 3 - Reconstruction at an Alternate Location - Preferred Alternative

The proposed action is for replacement of the Stallings Center and Pool 13,072 square foot facility at the corner of North Rampart Street and Lesseps Street in New Orleans, Louisiana with a 15,484 square foot facility at 4300 St. Claude Avenue. This action would include site preparation, building construction and construction of necessary utilities and appurtenances. Reconstruction of Stallings Center adjacent to the original location will restore the essential community services lost as a result of Hurricane Katrina. This location meets the purpose and need of the action, and complies with local zoning ordinances.

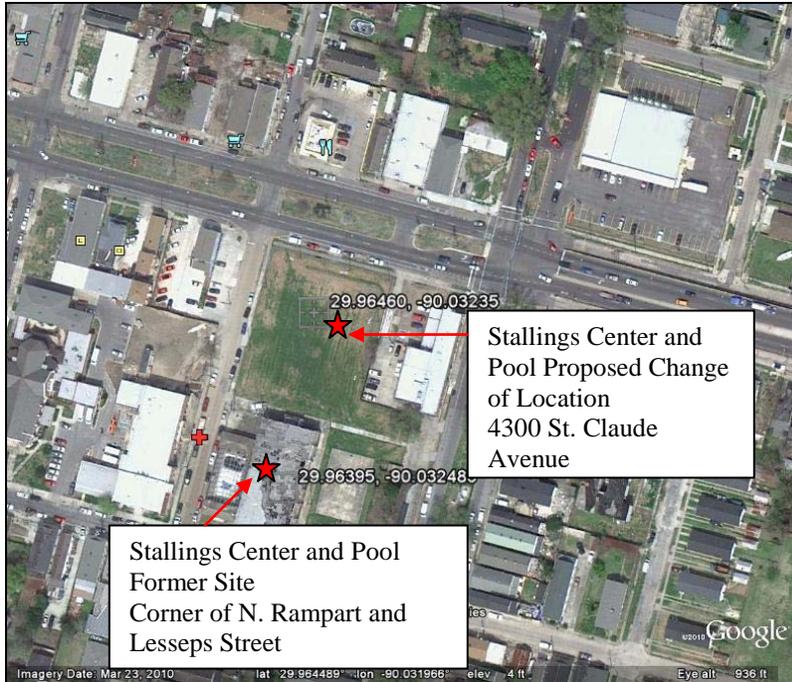


Figure 3 - Proposed Action – Change of Location - Former and New Site Locations (Google Maps®, 2010)

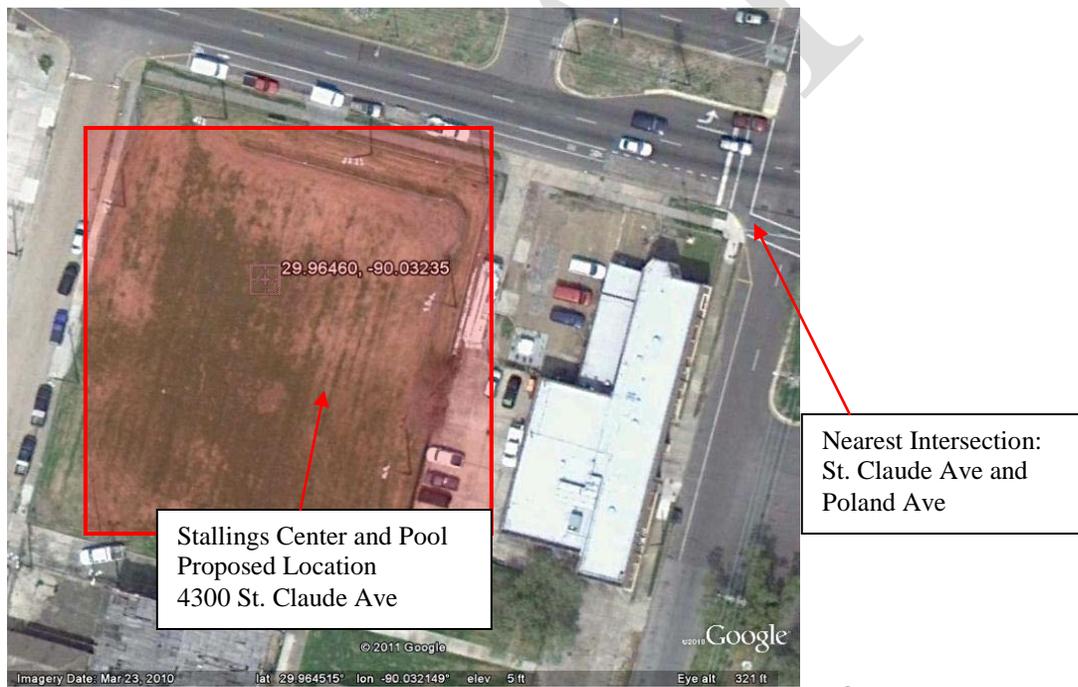


Figure 4 - Proposed Site Location with Current Site Layout (Google Maps®, 2010)

4.0 AFFECTED ENVIRONMENT AND IMPACTS

4.1 Land Use and Zoning

St. Claude is a neighborhood in the city of New Orleans. A subdistrict of the Bywater District Area, its boundaries as defined by the City Planning Commission are: Law, Montegut and North Galvez Streets, Lesseps Street, Burgundy Street, Clouet Street and St. Claude Avenue, and Franklin Avenue (Figure 5).

According to the United States Census Bureau, the district has a total area of 1.02 square miles (2.6 km²). 1.02 square miles (2.6 km²) of which is land and 0.00 square miles (0.0 km²) (0.0%) of which is water. According to the most recent available census figures, the population in this neighborhood stands at 3,454. The overall distribution of land uses in New Orleans has not changed significantly since Hurricane Katrina, though the amount of blight and vacant or underutilized property has increased dramatically as a result of the storm.

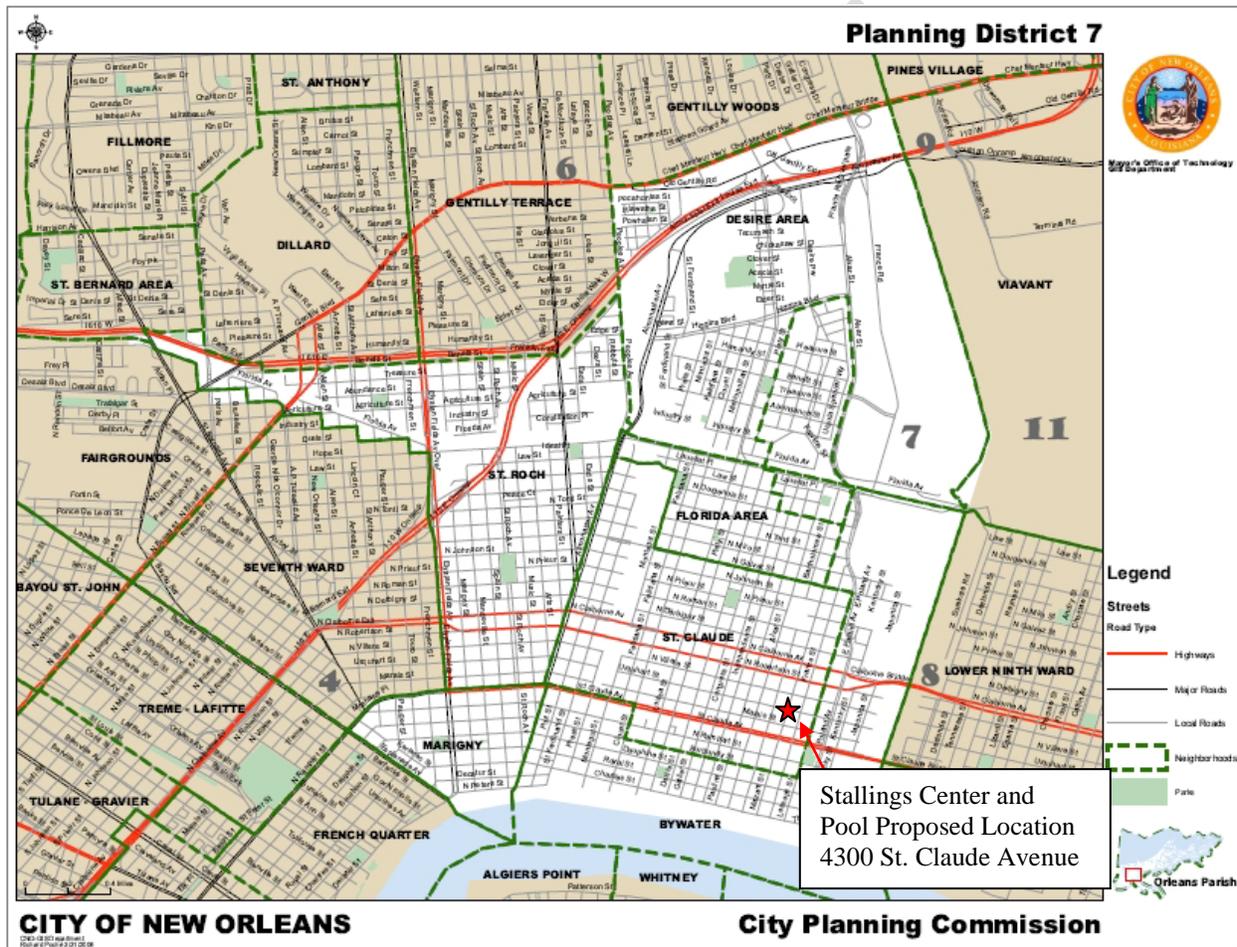


Figure 5 - Proposed Site Location within Planning District (City Planning Commission 2010)

The Comprehensive Zoning Law of the City of New Orleans of 1995, as amended, was enacted for the purposes of encouraging and promoting, in accordance with present and future needs, the safety, morals, health, order, convenience, prosperity, and general welfare of the citizens of the City of New Orleans, providing for efficiency and economy in the process of development and appropriate and best use of land, among others. These objectives are to be accomplished by establishing zoning districts and by regulating the location and use of buildings, signs and other structures, water and land for agriculture, trade, industry, and residence, by regulating and

limiting or determining the height, bulk, and access to light and air of buildings and structures, the area of yards and other open spaces and the density of use (New Orleans Comprehensive Zoning Ordinance).

The New Orleans City Charter requires that the City Planning Commission (CPC) prepare a long-term Master Plan. Before Katrina, the CPC had been working on a Master Plan for several years and had approved some sections of the plan. These older sections are being reviewed and updated, while new sections will be prepared on topics such as housing and human services, infrastructure and facilities, environmental quality, and economic development. The New Orleans Master Plan will focus on integrating and balancing the many interests and perspectives of neighborhoods, organizations and more, while defining a “roadmap” for the city’s future. The district regulations are designed to encourage a proportionate mixture of commercial and residential activity, to encourage the retention of existing historic and architecturally significant structures, and to encourage compatibility with adjacent or nearby land uses and the general character of the area. Figures 6 and 8 illustrate the differences between existing and future land use, as proposed by the City of New Orleans City Planning Commission.

Per the City of New Orleans City Planning Commission Zoning Base Map (Figure 6), the former Stallings Center and Pool site is currently zoned RD-3, Two-Family Residential District, whereas the proposed location is zoned C-1A, General Commercial District. These designations may change once the Master Plan is enacted (Figure 7). Per the City Planning Council City of New Orleans Future Land Use Map for District 7 adopted June 22, 2010 in the New Orleans Master Plan and CZO (Figure 8), the project location will be categorized as Residential Low Density Pre-war (former site) and Mixed Use-Low Density (proposed site). For the purposes of this EA, the current zoning designations shall be used to depict the sites.

RD-3 is intended to provide for two-family or town house development on smaller lots in older, more densely populated sections of the City, as well as in the outlying areas of the City. RD-3 provides for such development to be mixed with single-family dwellings; also provided for other uses such as churches, recreational facilities and accessory uses as may be necessary and compatible with residential surroundings. However, these land uses would be authorized as conditional uses within the RD-3 upon approval of a Conditional Use Permit under the standards and procedures contained in Section 16.6 of the New Orleans zoning regulations. Public and government buildings, limited to police stations, fire stations, community health centers, neighborhood centers, libraries, postal stations, and branch administrative offices are authorized as permitted uses in the C-1A General Commercial District, without the need for a Conditional Use Permit.

Alternative 1 – No Action: The no action alternative would conform to local land use; however, this would result in an additional vacant lot, adding further blight to the community.

Alternative 2 – Reconstruction in Original Location: Construction of the new facility within substantially its original footprint would place the facility within Zone RD-3, Two-Family Residential District. RD-3 provides for such development to be mixed with single-family dwellings; however, any uses outside of residential would need to be authorized as conditional uses within the RD-3 upon approval of a Conditional Use Permit.

Alternative 3 – Reconstruction at an Alternate Location - Preferred Alternative: Per the City of New Orleans City Planning Commission Zoning Base Map (Figure 6), the proposed location is zoned C-1A, General Commercial District. Public and government buildings, limited to police stations, fire stations, community health centers, neighborhood centers, libraries, postal stations, and branch administrative offices are authorized as permitted uses in the C-1A General Commercial District. The proposed action would comply with existing local land use regulatory codes and would not create a conflict with nearby and adjacent uses.

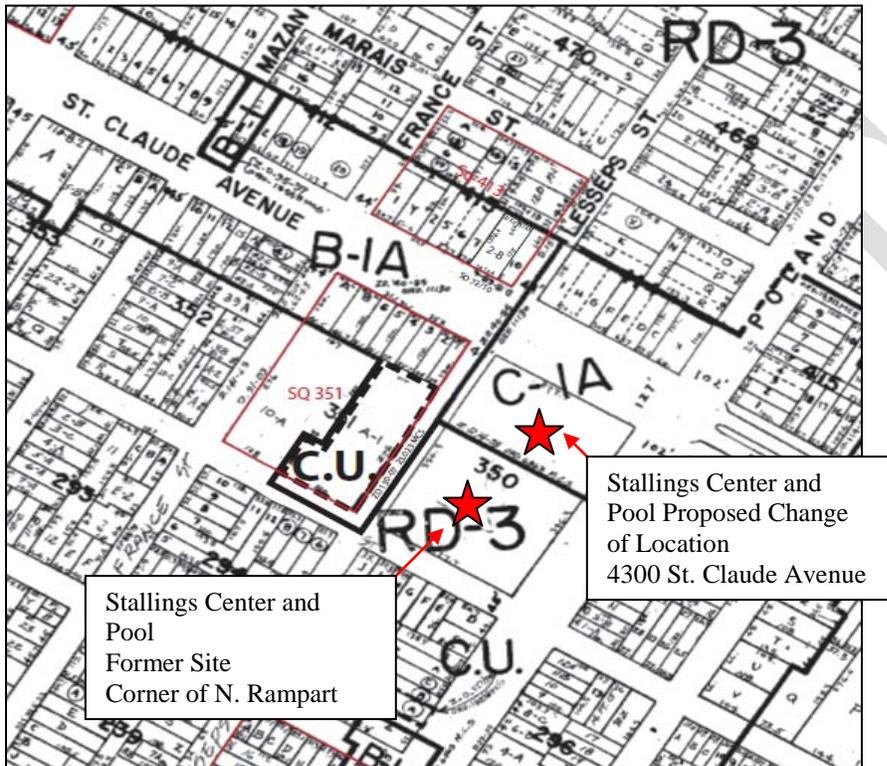


Figure 6 – Zoning of Former and Proposed Site Locations (City Planning Commission Zoning Base Map)

TRANSLATING PLACES INTO DISTRICTS

| Future Land Use Map | Potential Historic Urban Zoning Districts |
|--|---|
| Residential Single-Family Pre-War | Single-Family District |
| Residential Low Density Pre-War Residential Medium Density Pre-War | Single-Family & Two-Family Districts |
| Residential Multi-Family Pre-War | Multi-Family District |
| Mixed-Use Low Density Mixed-Use Medium Density Neighborhood Commercial | Commercial & Mixed-Use Districts |

- Residential districts will allow for small-scale open space & institutional uses – separate zoning districts not needed
- Some residential districts may allow for “corner stores” with proper use restrictions & development regulations

new orleans
MASTON PLAN AND COMMUNITY ZONING BOARD

Figure 7 – Table of District and Zoning Terms (City Planning Commission 2010)

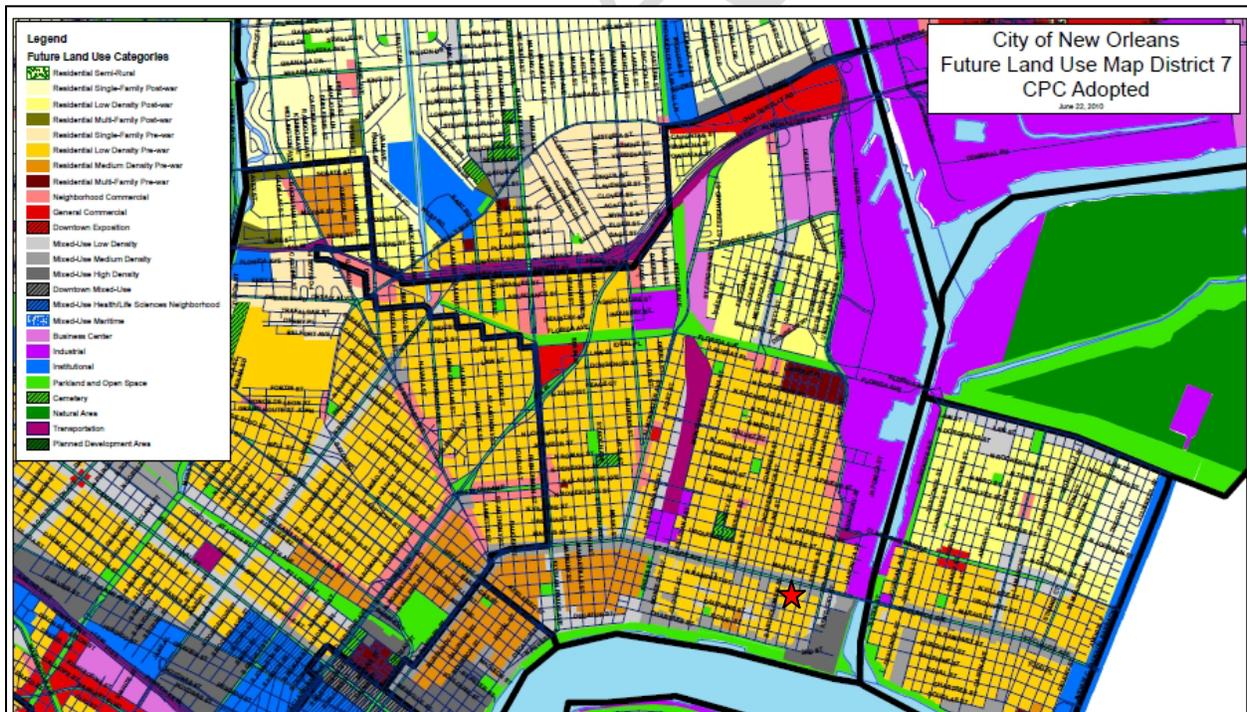


Figure 8 – Future Land Use of Proposed Site Location (City Planning Commission 2010)

4.2 Geology and Soils

According to the Louisiana Geological Survey (LGS), the geology in the vicinity of the site is predominantly Holocene Alluvium, Mississippi River sedimentary deposits composed mainly of sands, silts and clays (LGS, 2008). Figure 9 is a generalized geology map for Louisiana showing the location of the proposed project site in Orleans Parish.

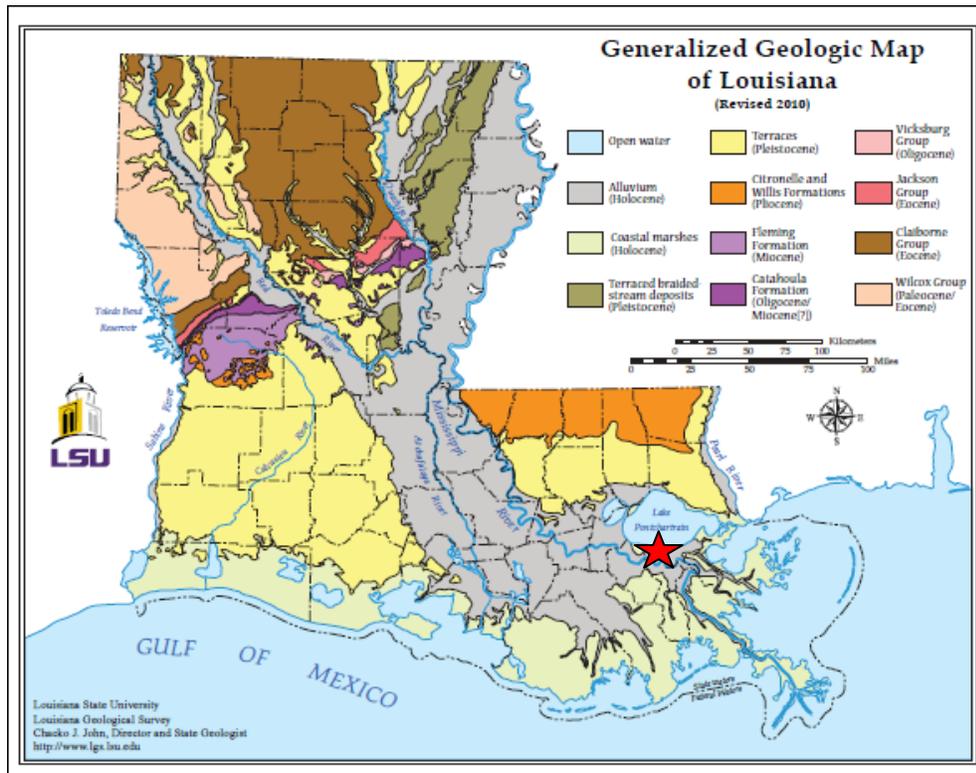


Figure 9 – General Geology Map of Louisiana (LGS, 2010)

The soils in Orleans Parish vary widely in their potential for major land uses and urban development. Soils in the vicinity of the proposed project site include the Cancienne silty clay loam (Figure 10, USDA, 2011). This somewhat poorly drained soil is in high and intermediate position on natural levees of the Mississippi River and its tributaries. Areas range from about 10 to 200 acres. Slope is less than 1 percent.

Typically, this soil has a dark gray silt loam surface layer about 4 inches thick. The subsoil to a depth of about 32 inches is dark grayish brown silty clay loam in the upper part and grayish brown silty clay loam and silt loam in the lower part. The substratum to a depth of about 60 inches is gray silt loam.

This soil has high fertility and a moderate shrink-swell potential. Water and air move through it at a moderately slow rate. Adequate water is available to plants in most years. A seasonal high water table fluctuates between depths of about 1.5 and 4 feet from December through April. Almost all the acreage of this soil is in urban areas. A small acreage is woodland. Houses,

streets, buildings, and parking lots cover about 25 to 75 percent of most urban areas. The open areas are mostly lawns, vacant lots, playgrounds, or vegetable gardens.

This Cancienne soil has moderate limitation affecting most urban uses; however, it is one of the best soils in the survey area for these uses. It is firm, consists of mineral material throughout, and can support the foundation of most low structures without the use of pilings. Wetness and the moderate shrink-swell potential are the main limitations affecting dwellings without basements. These limitations can be overcome easily by drainage and by using proper engineering designs.

The Farmland Protection Policy Act (FPPA: P.L. 97-98, Sec. 1539-1549; 7 U.S.C. 4201, *et. seq.*) was enacted in 1981 to minimize the unnecessary conversion of farmland to non-agricultural uses as a result of federal actions. Programs administered by federal agencies must be compatible with state and local farmland protection policies and programs. The Natural Resources Conservation Service (NRCS) is responsible for protecting significant agricultural lands from irreversible conversions that result in the loss of an essential food or environmental source. Prime farmland is characterized as land with the best physical and chemical characteristics for production of food, feed, forage, fiber and oilseed crops (USDA 1989).

Although the entire proposed site has been determined to be previously disturbed urban land, FEMA initiated consultation with the NRCS on January 31, 2011, regarding potential impacts to prime and unique farmland as defined in 7 CFR §658.2(a). In a response dated February 3, 2011, the NRCS indicated that the proposed action would be conducted in the city limits of New Orleans, and the project area is already devoted to urban and built-up areas. Soils in these areas are not considered prime farmland and are exempt from the Prime Farmland Protection Policy Act; therefore, no prime farmlands will be impacted (*Appendix B*).



Figure 10 - USDA Soil Map Cancienne silty clay loam (USDA, 2011)

Alternative 1 – No Action: The No Action Alternative would have no impact to geology or soils, because no construction would occur at the site.

Alternative 2 – Reconstruction in Original Location: Construction of the new facility within substantially its original footprint would temporarily impact soils during site preparation and building construction. Soils would be exposed during grading and foundation work. Additionally, installation of the new building may result in further compaction of the underlying soil. The soil around the reconstructed facility could be more susceptible to subsidence if adequate drainage and vegetation is not used.

Alternative 3 – Reconstruction at an Alternate Location - Preferred Alternative: The proposed action would temporarily impact soils during site preparation and building construction. Soils would be exposed during grading, foundation work and trenching for utilities. Additionally, installation of the proposed building would result in the compaction of the underlying soil. The soil around the newly constructed facility could be more susceptible to subsidence if adequate drainage and vegetation is not used.

Soil erosion would be minimized by the implementation of Clean Water Act (CWA) required Best Management Practices (BMPs) such as using silt fencing, covering stockpiled soils, mulching cleared areas and revegetating with native species. The Stallings Center and Pool is expected to use BMPs to minimize impacts to soil.

4.3 Water Resources

4.3.1 Groundwater

The geology of the area consists largely of riverine-derived sediments, mostly silts and clays, deposited in different eras (USGS, 2002). Layers of sands store water between layers of clay, which hold the water in. Some areas have natural artesian groundwater because of the pressure from recharge in northern parts of the study area.

The Chicot, Southern Hills, and New Orleans (Mississippi Alluvium) aquifer systems generally consist of alternating beds of unconsolidated and semi-consolidated sand, gravel, silt, and clay deposited in fluvial, deltaic, and near-shore marine environments. Beds in the aquifers generally dip and thicken towards the south and southeast.

Recharge to these systems generally occurs from precipitation in the recharge areas to the north. Groundwater flow is generally towards the south and east. Salty water occurs in the individual aquifers in several areas, principally near the coast and in the New Orleans area.

Alternative 1 – No Action: The No Action Alternative would have no impact to groundwater resources, because no construction would occur at the site.

Alternative 2 – Reconstruction in Original Location: Construction of the new facility within substantially its original footprint would not significantly impact groundwater resources, as it would be replaced in an area having existing utilities and infrastructure in place.

Alternative 3 – Reconstruction at an Alternate Location - Preferred Alternative: Construction of the new facility within an area having existing utilities and infrastructure in place would not significantly impact groundwater resources.

4.3.2 Wetlands

The United States Army Corps Engineers (USACE) regulates the discharge of dredged or fill material into waters of the U.S., including wetlands, pursuant to Section 404 of the Clean Water Act. Wetlands are identified as those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. The USACE also regulates the building of structures in waters of the U.S. pursuant to the Rivers and Harbors Act (RHA).

Executive Order (EO) 11990, Protection of Wetlands, directs federal agencies to minimize the destruction, loss, or degradation of wetlands and to preserve and enhance the values of wetlands

for federally funded projects. FEMA regulations for complying with E.O. 11990 are found at 44 CFR Part 9, Floodplain Management and Protection of Wetlands. The U.S. Fish & Wildlife Service (USFWS) National Wetlands Inventory (NWI) Map shows no wetlands within the proposed project area that could be adversely affected by the project (Figure 11, USFWS 2010).



Figure 11 - U. S. Fish and Wildlife Service Wetlands Inventory Map (USFWS, 2010)

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

Alternative 2 – Reconstruction in Original Location: Reconstruction of Stallings Center in substantially its original footprint would have no impact on wetlands or other waters of the U.S. FEMA has determined that the proposed site is an urban previously-disturbed site with no direct impact to wetlands. It would not require permits under Section 404 of the Clean Water Act or Section 10 of the Rivers and Harbors Act.

Alternative 3 – Reconstruction at an Alternate Location - Preferred Alternative: The proposed action would have no impact on wetlands or other waters of the U.S. FEMA has determined that the proposed site is an urban previously-disturbed site with no direct impacts to wetlands. The project as proposed would not require permits under Section 404 of the Clean Water Act or Section 10 of the Rivers and Harbors Act.

To minimize indirect impacts (erosion, sedimentation, dust and other construction-related disturbances) to the well-defined urban drainage ways surrounding the proposed action, the

following best management practices will be included into the daily operations of the construction activities: silt screens, barriers (*e.g.*, hay bales), berms/dikes, fences, etc. will be placed where and as needed. Fencing will be placed for marking staging areas to store construction equipment and supplies as well as conduct maintenance/repair operations.

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