

Environmental Assessment

Wesley Barrow Stadium

City of New Orleans

FEMA-1603-DR-LA

Orleans Parish, Louisiana

June 2011

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



FEMA

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LIST OF ACRONYMS

ABFE	Advisory Base Flood Elevation
APE	Area of Potential Effects
BMPs	Best Management Practices
CAA	Clean Air Act
CBRA	Coastal Barrier Resources Act
CBRS	Coastal Barrier Resources System
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
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
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
MOA	Memorandum of Agreement
NAVD 88	North American Vertical Datum of 1988
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service
NOAA	National Oceanic & Atmospheric Administration
PA	Public Assistance Grant Program
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
USFWS	United States Fish and Wildlife Service

1.0 INTRODUCTION

1.1 Project Authority

Hurricane Katrina made landfall on August 29, 2005 near Buras-Triumph, Louisiana 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 Program (PA) 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 Wesley Barrow Stadium, owned by the City of New Orleans in Orleans Parish sustained major damage as a result of Hurricane Katrina. It was deemed eligible by FEMA for Federal disaster public assistance as a non-critical recreational facility serving the needs of the general public.

The Wesley Barrow Stadium is a facility of the New Orleans Recreational Department and located at 6500 Press Drive, New Orleans, Louisiana, Latitude 30.02881, Longitude -90.04205 (Figures 1 and 2). This facility consists of a baseball field, dugouts and batting cages. The stadium building is a 2,900 square foot (SF) concrete block building with a concrete riser which supports 11 rows of aluminum bleachers. It is covered with a steel and wood framed 3,860 SF corrugated steel roof.

The stadium building houses two spectator restrooms (20-feet-6-inches by 7-feet-6-inches each), two utility closets (8-feet by 5-feet-6-inches each), two team restrooms (9-feet-6-inches by 6-feet-6-inches each), two team dressing rooms (15-feet-6-inches by 15-feet-6-inches each), one concession area (30-feet-6-inches by 5-feet-6-inches), one entryway (58-feet by 10-feet), and two storage areas (9-feet by 15-feet-6-inches each).

The baseball field has a 10-foot high chain link perimeter fence with 6-foot and 4-foot high interior fences separating the dugouts, practice batting areas, and bullpens. There is also a chain

link fence separating the bleachers from the playing field, providing protection from foul balls. Covering much of the perimeter fencing is privacy, black mesh fabric.

There are two dugouts, each is 23-feet long and 5-feet deep with an 8-foot high wood frame structure composed of 1-inch by 6-inch wood roof and wall panels.

In the outfield there are two 20-foot tall steel foul posts (one along first base line and one along third base line), an electronic scoreboard, and eight 85-foot tall steel light posts, each with 12 – 1,000 watt metal halide sports floodlights and two 9-foot by 3-foot and 2-foot high steel maintenance platforms. The floodlights are attached to the two platforms and arranged in two rows of six.

Along the first baseline is an 81-feet by 25-feet batting cage with a 15-foot aluminum bench and 1,200 SF of indoor/outdoor grass carpet.



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

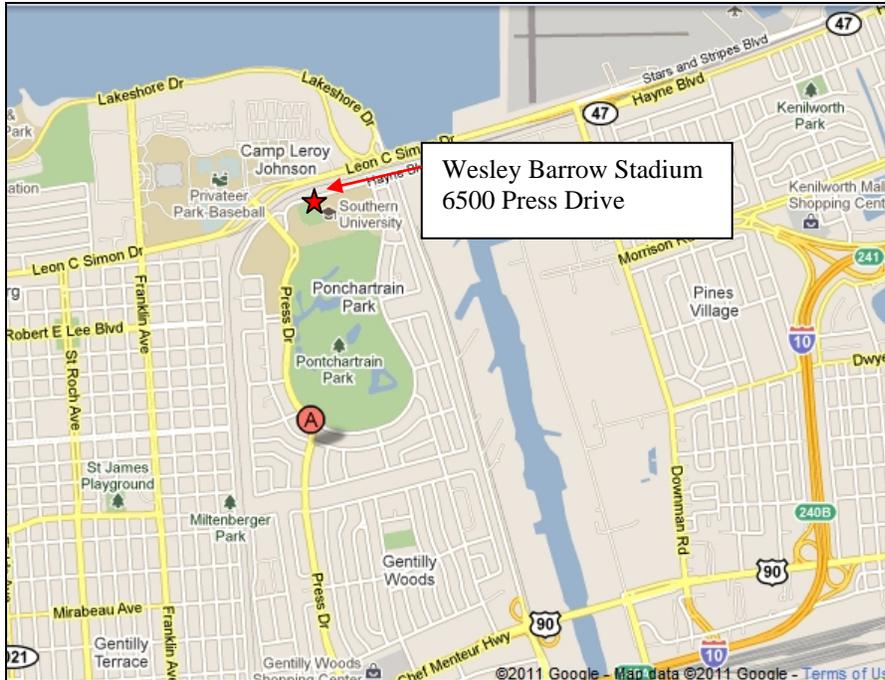


Figure 2 - Wesley Barrow Stadium Reconstruction Location (Google Maps®, 2011)

2.0 PURPOSE AND NEED

Prior to Hurricane Katrina, Wesley Barrow Stadium serviced the Pontchartrain Park area of New Orleans and was utilized by schools and other organizations for the purposes of outdoor athletics and recreation.

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. Wesley Barrow Stadium was utilized by residents of the Pontchartrain Park Area and aided the area’s youth to engage in organized athletic and recreational activities. These recreational community services provided by Wesley Barrow Stadium were lost as a result of Hurricane Katrina. Restoration of recreational services in a manner that best serves the local community is needed for FEMA PA and the City of New Orleans to achieve this 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/repair of the Wesley Barrow Stadium in the same footprint, and 3) Reconstruction and reorientation of the Wesley Barrow Stadium at the original site (Figures 3 and 4).

3.1 Alternative 1 - No Action

Implementation of the No Action Alternative would entail no repair, reconstruction, or relocation of Wesley Barrow Stadium. Consequently, the community would be unable to utilize 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/Repair in the Same Footprint

This alternative would reconstruct/repair the damaged Wesley Barrow Stadium eligible facilities to the pre-disaster configuration, function and capacity in substantially the same footprint, which would restore the community service as it existed prior to Hurricane Katrina. This alternative meets the purpose and need of the action.

3.3 Alternative 3 - Reconstruction and Reorientation at the Original Site - Proposed Action

The proposed action is for replacement of the Wesley Barrow Stadium 2,900 SF concrete block covered stadium building and 3,860 SF corrugated steel roof in with a 4,670 SF facility in a different orientation at 6500 Press Drive, New Orleans, LA. The City of New Orleans has proposed reorientation of the original structure based on safety concerns. As most games are held in the afternoon/evening hours, the current southwest orientation has the setting sun fall in the batter's face, reducing their ability to see the pitch. The proposed re-orientation of the facility will have home plate and the batter face east, which will eliminate this safety issue. Major League Baseball has consulted on the design of this project, and highly recommends this change in the new facility. This action would include site preparation, construction of building and necessary utilities and appurtenances. Reconstruction of Wesley Barrow Stadium adjacent to the original footprint with a due east orientation instead of the current southwest orientation will restore the community services lost as a result of Hurricane Katrina. This alternative meets the purpose and need of the action.



Figure 3 - Proposed Action (Google Maps®, 2011)

4.0 AFFECTED ENVIRONMENT AND IMPACTS

4.1 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 EO 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 and a site visit conducted on April 14, 2011 show no wetlands within the proposed project area that could be adversely affected by the project (Figure 4, USFWS 2010). In comments received on April 20, 2011, the USACE indicated that no federal permit would be required for the placement or redistribution of dredged or fill material on the proposed project site (*Appendix B*).



Figure 4 - U. S. Fish and Wildlife Service Wetlands Inventory Map (USFWS, 2011)

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/repair in the same footprint: Reconstruction/repair of Wesley Barrow Stadium in substantially its same 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 and is not a wetland under Executive Order 11990. 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 and reorientation at the original site - Proposed Action: The proposed action alternative 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 and is not a jurisdictional wetland under Executive Order 11990. 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 should 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.

4.2 Floodplains

Executive Order 11988 (Floodplain Management) requires Federal agencies to avoid direct or indirect support or development within the 100-year floodplain whenever there is a practicable alternative. FEMA's regulations for complying with EO 11988 are found at 44 CFR Part 9, Floodplain Management and Protection of Wetlands.

In July 2005, FEMA initiated a series of flood insurance studies for many of the Louisiana coastal parishes as part of the Flood Map Modernization effort through FEMA's National Flood Insurance Fund. These studies were necessary because the flood hazard and risk information shown on many Flood Insurance Rate Maps (FIRMs) was developed during the 1970s, and the physical terrain had changed significantly, such as major loss of wetland areas. After Hurricanes Katrina and Rita, FEMA expanded the scope of work to include all of coastal Louisiana. The magnitude of the impacts of Hurricanes Katrina and Rita reinforced the urgency to obtain additional flood recovery data for the coastal zones of Louisiana. More detailed analysis was possible because new data obtained after the hurricanes including information on levees and levee systems, new high-water marks, and new hurricane parameters.

During an initial post-hurricane analysis, FEMA determined that the "100-Year" or 1-percent chance storm flood elevations on FIRMs for many Louisiana communities, referred to as Base Flood Elevations (BFEs), were too low. FEMA created recovery maps showing the extent and magnitude of Hurricane Katrina's and Rita's surge, as well as information on other storms over the past 25 years. The advisory flood data shown on the recovery maps for the Louisiana-declared disaster areas show high-water marks surveyed after the storm; flood limits developed from these surveyed points; and Advisory Base Flood Elevations, or ABFEs. The recovery maps and other advisory data were developed to assist parish officials, homeowners, business owners, and other affected citizens with their recovery and rebuilding efforts.

Updated preliminary flood hazard maps from an intensive five-year mapping project guided by FEMA are now provided to all Louisiana coastal parishes. The new maps, known as Preliminary Digital Flood Insurance Rate Maps (DFIRMs), are based on the most technically advanced flood insurance studies ever performed for Louisiana, followed by multiple levels of review. They provide an up-to-date, accurate picture of coastal Louisiana flood risks. The DFIRMs provide communities with a more scientific approach to economic development, hazard mitigation planning, emergency response and post-flood recovery.

As of the release date of DFIRMs, unobligated FEMA Public Assistance grants are to be held to a minimum BFE that is established by DFIRM. Orleans Parish DFIRMs were issued November 2008. Local ordinances based on ABFE maps may require a more stringent elevation requirement.

In compliance with FEMA policy implementing EO 11988, Floodplain Management, the proposed project was reviewed for possible impacts associated with occupancy or modification to a floodplain. Orleans Parish enrolled in the NFIP on August 3, 1970.

Alternative 1 – No Action: As no building would be constructed at the site the No Action Alternative would have no impact on the 100-year floodplain.

Alternative 2 – Reconstruction/repair in the same footprint: Per preliminary DFIRM panel number 22071C0120F, dated November 13, 2008 (Figure 5), the former Wesley Barrow Stadium site is located in AE (EL 1), a Special Flood Hazard Area (SFHA) subject to inundation by the 1-percent annual chance (100-year) flood; base flood elevations determined. Per Advisory Base Flood Elevation Map (ABFE Map) LA-EE32 (Figure 6), dated June 5, 2006, the former site is located in ABFE El -1 or 3 ft above Highest Existing Adjacent Grade (HEAG). Reconstruction/repair of Wesley Barrow Stadium in substantially its same footprint will have no determinable impact on flood elevations, nor will it increase development in this fully built-out area. In compliance with EO 11988, an 8-step process was completed and documentation is attached in Appendix B.

Alternative 3 – Reconstruction and reorientation at the original site - Proposed Action: The proposed action alternative would involve the reconstruction and reorientation of Wesley Barrow facilities at the original site. Per preliminary DFIRM panel number 22071C0120F dated November 13, 2008 (Figure 5), the proposed project site is located in AE (EL 1), a Special Flood Hazard Area (SFHA) subject to inundation by the 1-percent annual chance (100-year) flood; base flood elevations determined. (Older FIRMs may show “A numbered” zones. These are the same as Zone AE). In addition, per Advisory Base Flood Elevation Map (ABFE Map) LA-EE32 (Figure 6) the proposed project site is located in ABFE El -1 or 3 ft above Highest Existing Adjacent Grade (HEAG). The reconstruction and reorientation of this facility will have no determinable impact on flood elevations, nor will it increase development in this fully built-out area. However, as this alternative is determined to be a substantial improvement, the lowest floor of the building must be elevated or flood-proofed to the base flood elevation (BFE), of 1 foot relative to the North American Vertical Datum of 1988 (NAVD 88). In compliance with EO 11988, an 8-step process was completed and documentation is attached in Appendix B.

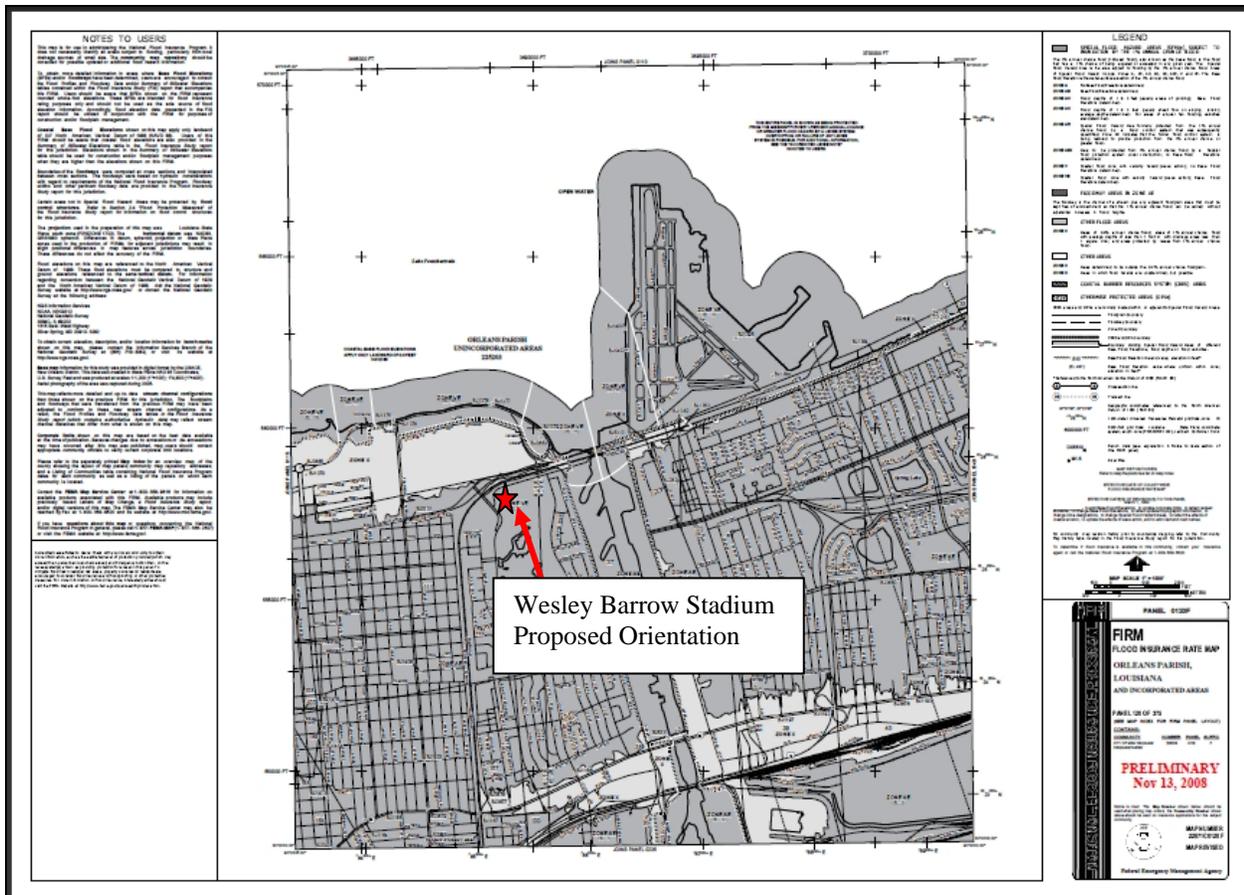


Figure 5 - Preliminary Digital Flood Insurance Rate Map Panel 22071C0120F (FEMA, 2008)¹

¹ Labeling error on preliminary DFIRM panel number 22071C0120F. The project area is labeled as Zone VE (El. 1). Memorandum from FEMA Mitigation Region 6 corrects a mapping error and identifies site as Zone AE (El. 1). (Appendix B).

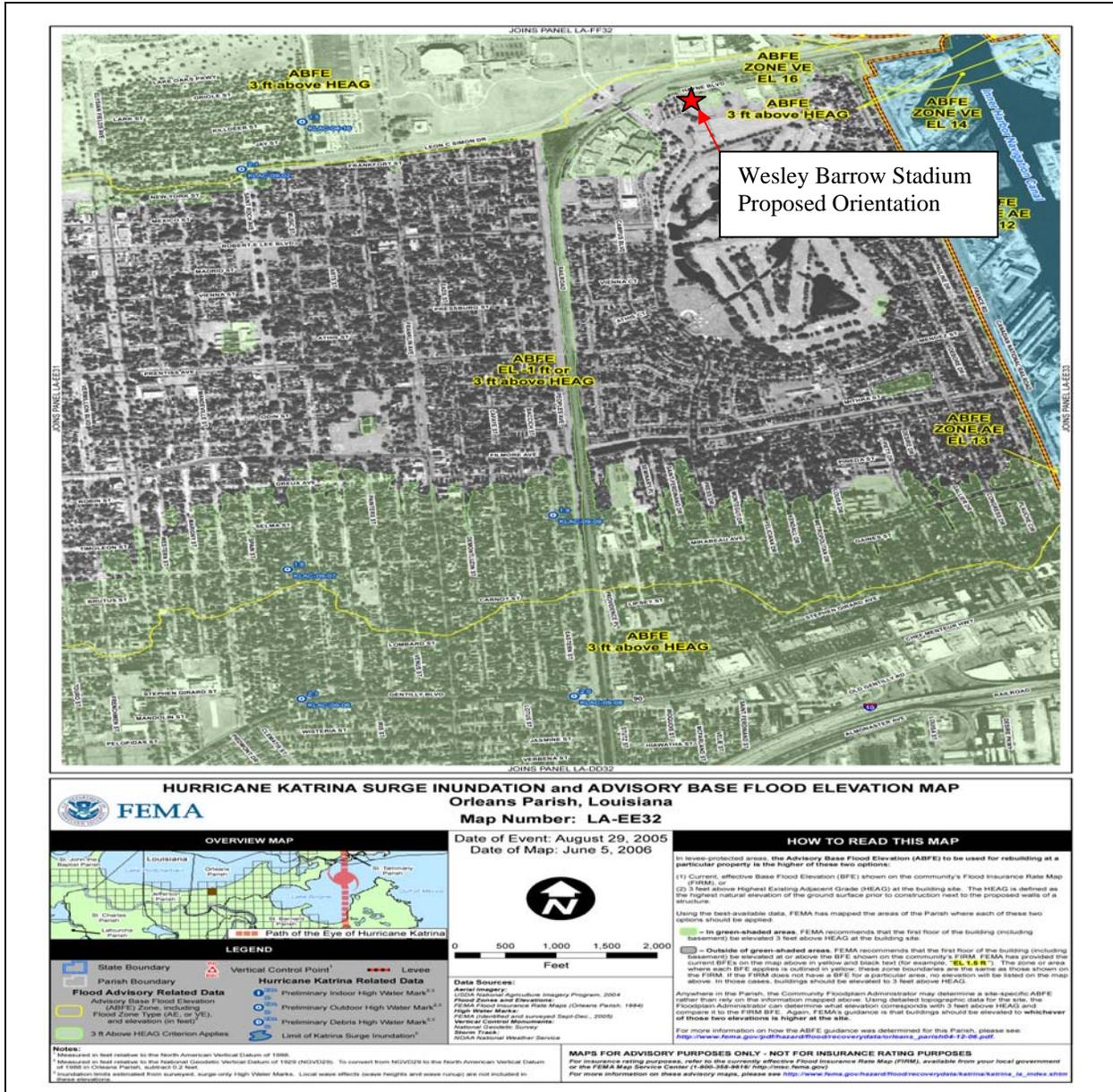


Figure 6 – Advisory Base Flood Elevation Map OR-LA-EE32 (FEMA, June 5, 2006)

4.3 Coastal Resources

The Coastal Zone Management Act of 1972 (CZMA) requires Federal agency actions to be consistent with the policies of the state coastal zone management program when conducting or supporting activities that affect a coastal zone. The Louisiana Department of Natural Resources (LDNR) regulates development in Louisiana's designated coastal zone through the Coastal Use Permit Program. The existing facility and the proposed project site are located in the coastal zone and are required to obtain a Coastal Use Permit prior to construction (*Appendix B*).

The USFWS regulates Federal funding in Coastal Barrier Resource System (CBRS) units under the Coastal Barrier Resources Act (CBRA). This Act protects undeveloped coastal barriers and related areas (*i.e.*, Otherwise Protected Areas) by prohibiting direct or indirect Federal funding of projects that support development in these areas. The Act promotes appropriate use and conservation of coastal barriers along the Gulf of Mexico. The proposed project site is not located within a regulated CBRS unit.

Alternative 1 – No Action: The No Action Alternative would have no impact on a coastal zone or to a CBRS unit.

Alternative 2 – Reconstruction/repair in the same footprint: Reconstruction/repair of Wesley Barrow Stadium in substantially its same footprint would involve construction in a designated coastal zone. This project requires a Coastal Use Permit from LDNR. The City of New Orleans is required to contact LDNR prior to initiating work. The original site is not within a CBRS unit; therefore, it does not trigger the CBRA.

Alternative 3 – Reconstruction and reorientation at the original site - Proposed Action: The proposed action alternative would involve construction in a designated coastal zone. This project requires a Coastal Use Permit from LDNR. The City of New Orleans is required to contact LDNR prior to initiating work. The proposed site is not within a CBRS unit; therefore, the Proposed Action Alternative does not trigger the CBRA.

4.4 Biological Resources

The Endangered Species Act (ESA) of 1973 prohibits the taking of listed, threatened, and endangered species unless specifically authorized by permit from the USFWS or the National Marine Fisheries Service. "Take" is defined in ESA Section 3 as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect or attempt to engage in any such conduct." Harm is further defined by the ESA regulations to include significant habitat modification or degradation that results in death or injury to listed species by significantly impairing behavioral patterns such as breeding, feeding, or sheltering. The West Indian manatee, Gulf sturgeon and pallid sturgeon are species Federally listed as threatened or endangered found in Orleans Parish.

Alternative 1 – No Action: The No Action Alternative would have no impact on species Federally listed as threatened or endangered.

Alternative 2 – Reconstruction/repair in the same footprint: Reconstruction/repair of Wesley Barrow Stadium in substantially its same footprint would have no impact on species Federally listed as threatened or endangered.

Alternative 3 – Reconstruction and reorientation at the original site - Proposed Action: Inspections of the proposed reorientation site did not indicate the presence of any species Federally listed as threatened or endangered. In correspondence dated April 8, 2011, the USFWS stated that the project, as proposed, would have no effect on Federal trust resources under its jurisdiction and currently protected by the ESA (*Appendix B*). The National Oceanic & Atmospheric Administration (NOAA) National Marine Fisheries Service (NMFS) had no comment to the project scoping notification sent on March 29, 2011 (*Appendix B*).

4.5 Cultural Resources

The consideration of effects to historic properties listed in or eligible for the National Register of Historic Places (NRHP) is mandated under Section 106 of the National Historic Preservation Act (NHPA) as implemented by 36 CFR Part 800. Requirements include the identification of significant or historic properties that may be affected by the proposed action or alternatives within the project's area of potential effects. Historic properties are defined as archaeological sites, standing structures or other historic resources listed in or determined eligible for listing in the NRHP. If adverse effects on historic properties are identified, Federal agencies must consider effects of their activities and attempt to avoid, minimize, or mitigate the effects to these historic properties.

FEMA, the Louisiana State Historical Preservation Office (SHPO), the Louisiana Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP), the Alabama-Coushatta Tribe of Texas, the Caddo Nation, the Chitimacha Tribe of Louisiana, the Choctaw Nation of Oklahoma, the Coushatta Tribe of Louisiana, the Jena Band of Choctaw Indians, the Mississippi Band of Choctaw Indians, the Quapaw Tribe of Oklahoma, the Seminole Nation of Oklahoma, the Seminole Tribe of Florida, the Tunica-Biloxi Tribe of Louisiana, and the Advisory Council on Historic Preservation (ACHP) have executed a Statewide Programmatic Agreement (PA) dated August 17, 2009 to streamline the NHPA Section 106 review process (hereafter referred to as the Statewide PA). The proposed action is subject to the standard project review stipulation of the PA.

Existing Conditions

Barrow Stadium, built 1957, is a contributing element to the Pontchartrain Park Historic District, which is eligible for listing in the NRHP under Criterion A: Effects and Patterns (Photographs 1-2). The property is bounded by Hayne Boulevard on the north/northwest, Press Drive on the southwest, and Pontchartrain Park on the south and east. The Area of Potential Effects (APE) for Standing Structures comprises the project site, as well as the golf course and park areas of Pontchartrain Park and a portion of the SUNO campus (Figure 7). The APE for Archaeology is the 8.31 acres project site (Figure 7).



Photograph 1. Historic photograph circa 1957 of the newly built Barrow Stadium, 6500 Press Drive. View is facing southwest showing the outside area of the covered bleachers structure behind home plate. (New Orleans Public Library)



Photograph 2. Barrow Stadium, 6500 Press Drive. Present-day view facing east showing baseball dugout area on the left and the covered bleachers area at center of photograph. (FEMA, 2011)

Standing Structures

Standing Structures within the APE were identified based on map research and prior site visits by FEMA with SHPO staff during December 2009 and November 2010. The Pontchartrain Park Maintenance Building is the closest to the project site, located approximately 30 feet east from the Barrow Stadium lot. The SUNO Administration, Multi-Purpose and Gymnasium buildings are located approximately 700-800 feet southwest from the stadium area. In total, the APE contains eight buildings, one historic district, and one designed landscape, listed below in Table 1.

Table 1. Identification of Historic Properties Within the Standing Structures APE.

	Property/Resources	Current Address	Estimated Construction Date	Located in Pontchartrain Park NRHD?	NRHP eligibility status	Latitude	Longitude
1	Pontchartrain Park Historic District	Bounded approximately by Prentiss Avenue, Press Drive, Hayne Boulevard, Debore Drive, New York Circle and Congress Drive	1955-57	--	Eligible for the NRHP		
2	Barrow Stadium	6500 Press Drive	1957	Yes	Contributing	30.0288420	-90.0420450

3	Golf Course Club House and Picnic Shelter	6514 Congress Drive	1969	Yes	Non-contributing	30.0273300	-90.0386980
4	Pontchartrain Park Community Center	6520 Congress Drive	2005	Yes	Non-contributing	30.0283880	-90.0390190
5	Pontchartrain Park Maintenance Building	4800 Hayne Boulevard	circa 1960s	Yes	Non-contributing	30.0287660	-90.0409540
6	NORD Building & Playground	5720 Press Drive	circa 1970s	Yes	Non-contributing	30.0189380	-90.0429680
7	SUNO Admin	6400 Press Drive	1959	No	Individually Eligible	30.0258840	-90.0442360
8	SUNO Multi-Purpose Building	6400 Press Drive	1993	No	Ineligible	30.0266130	-90.0443360
9	SUNO Gymnasium	6400 Press Drive	1969	No	Ineligible	30.0269530	-90.0444960
10	Bartholomew Golf Course	6514 Press Drive	1955-57	Yes	Contributing	30.0252240	-90.0410730

Figure 7 shows the locations of the above properties/resources. The majority of the APE falls inside the NRHP-eligible Pontchartrain Park Historic District. The primary contributing resource of the District is the Joseph M. Bartholomew Golf Course and Park, a historic landscape built between 1955 and 1957. The 18-hole professional public golf course comprises the largest part of the Pontchartrain Historic District. It is located in the approximate center of the park, with recreational and community facilities around the perimeter. Barrow Stadium is the only structure inside the park determined to be a contributing element. Further information about the stadium may be found in the copy of FEMA's consultation letter to SHPO, dated April 6, 2011, included in Appendix B.

One NRHP-eligible property exists outside of the District in the APE. The SUNO Administration Building was determined by FEMA to be individually eligible for the NRHP. Built in 1959, the building is significant under Criterion A for its historic association with ethnic heritage (African-American), social history and the history of education.



Figure 7. Barrow Stadium Study Area. The map overlays depict the National Register-eligible Pontchartrain Park Historic District (green outline), the Standing Structures APE (yellow outline), the Archaeological APE (red/shaded) and the standing structures identified in Table 1.

Archaeological Properties

The archaeological potential for Pontchartrain Park, which includes the APE for the proposed action, was previously assessed in October 2009 during the NHPA Section 106 review for

restoration of the Joe Bartholomew Golf Course. The following identification and evaluation is based on the assessment carried out in 2009 and the March 2011 reassessment by FEMA archaeologists.

Data from SHPO indicates there is one recorded archaeological site within 0.25 miles of the Archaeological APE (Figure 7). Site 16OR219, Camp Leroy Johnson U.S. Army Air Base, is located north of the APE. This military base was constructed on lake bottom land, reclaimed by construction of levees in 1927, and functioned from 1941-1964. This archaeological site was evaluated in 2006 as ineligible for listing on the NRHP. According to the site card, the boundaries of 16OR219 do not extend south of the railroad or Leon C. Simon Drive and thus, it would not be affected by the proposed undertaking. Archaeological site (16OR324) located approximately 0.47 miles from the Archaeological APE (Figure 8), at 2659 New York Street, is a circa 1950 bunker whose NRHP eligibility is undetermined. Given its distance from the proposed undertaking, this site will not be affected by any of the proposed alternatives.

The Wesley Barrow Stadium APE falls within the Orleans Parish High Probability Zone because of its location near the old lakeshore. The soils consist of Schriever Clay and organic and mineral deposits of Gulf Coast Deltaic Marsh. This area is comprised of reclaimed land from the Lake Pontchartrain lake bottom or backswamp. The Hardee's 1878 map entitled *New Orleans* shows much of this general area as undeveloped woods and marsh. The 1849 Sauvé's Crevasse Map similarly shows this area as "reed jungle." The Robinson (1883) map does not cover this area. By 1884 this area was slated for potential development with a grid of streets, although no evidence was located to demonstrate that residential development ever took place in this vicinity at this time. No improvements are shown in the Project area on the 1937-1951 Sanborn Fire Insurance Map. The 1953 U.S.G.S. Spanish Fort quadrangle depicts no improvements in the project area. Between 1955 and 1957 aerial photographs show the baseball field being constructed in its current configuration, with the remainder of APE surrounded by undeveloped land or recently leveled or graded land. In summary, the site appears to be extensively disturbed by previous construction and extensively filled. A site visit was conducted by FEMA Archaeologist Dale Wolke in October 2009, as part of an evaluation of the Joe Bartholomew Golf Course. No prehistoric artifacts or features were encountered during the pedestrian survey. A small cluster of brick fragments and whiteware ceramics were noted in fill material.

The prehistoric and historic archaeological potential of the APE appears very low given the recent nature of the historic development in this area, the amount of previous ground disturbance, and that significant historic deposits associated with the early years of the Wesley Barrow Stadium (circa 1957-1961) are unlikely given that city water and sewer were available at this time.

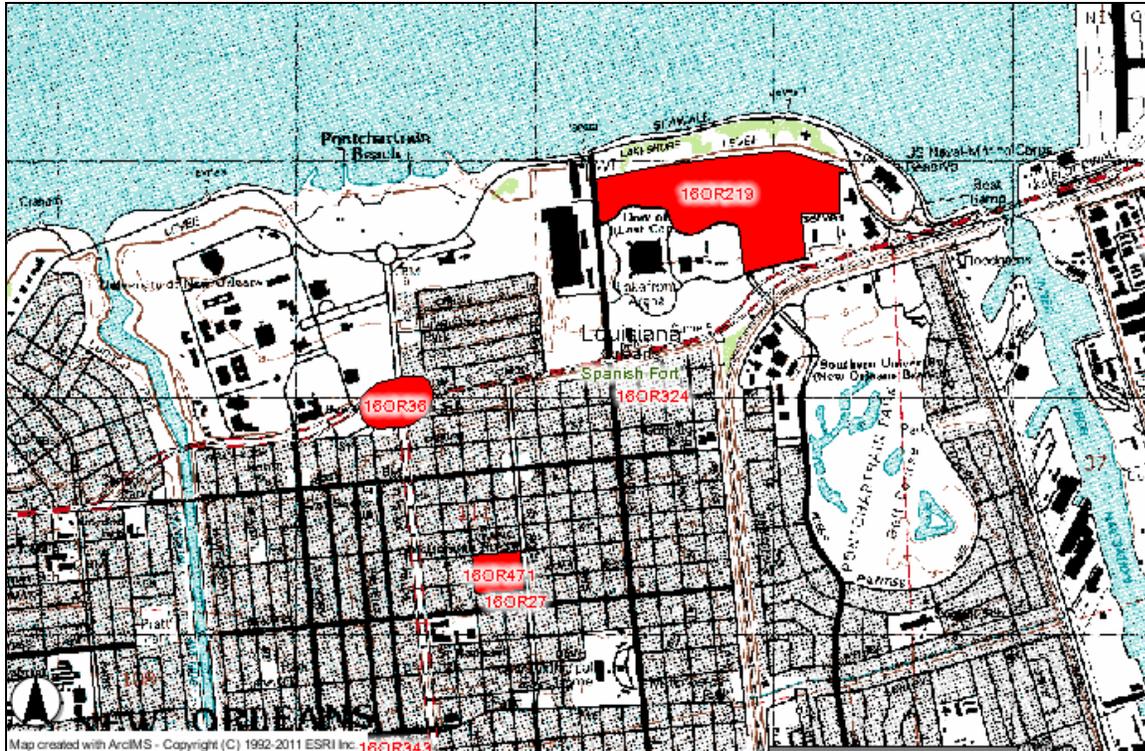


Figure 8. Barrow Stadium Archaeological APE with nearest known archaeological sites plotted. Note that according to the Louisiana Division of Archaeology’s site files, 16OR219 does not extend south of the railroad and Leon C. Simon Drive.

Alternative 1 - No Action: The no action alternative would likely result in further deterioration to Barrow Stadium and possibly result in an adverse impact to the historic property.

Alternative 2 – Reconstruction/repair in the same footprint: Demolition of Barrow Stadium would adversely affect historic properties, specifically the Stadium and the Pontchartrain Park Historic District. In kind reconstruction/repairs in the original stadium location would not impact any cultural resources.

Alternative 3 - Reconstruction and reorientation at the original site - Proposed Action: FEMA has applied the criteria of adverse effect, pursuant to 36 CFR 800.5(a)(1), and determined that the demolition of Barrow Stadium will adversely affect historic properties, specifically the Barrow Stadium and the Pontchartrain Park Historic District. FEMA has also determined to take steps to consider the effects of the proposed demolition and the replacement of Barrow Stadium through the development of a **Memorandum of Agreement (MOA)**.

Since the project area appears to be located in reclaimed marsh and extensively disturbed by modern construction, FEMA has determined that no archaeological historic properties would be affected by the proposed action. The Applicant will be required to treat any inadvertent discoveries, including unmarked human burials, through a process that will be included in the MOA developed for this undertaking.

FEMA initiated the adverse effect consultation process and identified as potential Consulting Parties the Pontilly Neighborhood Association, Pontchartrain Park Community Development Corporation, Southern University of New Orleans, the Preservation Resource Center of New Orleans, the Louisiana Landmarks Society, the National Trust for Historic Preservation, the City of New Orleans Historic District Landmark Commission, and Louisiana Chapter of Documentation and Conservation of Building Sites and Neighborhoods of the Modern Movement. FEMA may also post public notices or initiate other avenues for public input as the NHPA Section 106 review progresses. FEMA notified the ACHP of the Adverse Effect to Historic Properties. The ACHP declined to participate in the Section 106 consultation process on April 27, 2011 (Appendix B).

The first consultation meeting to develop an MOA was held on April 21, 2011 and included participants from the City of New Orleans, GOHSEP, SCNZ Architects (project architect), the Pontilly Neighborhood Association, the Pontchartrain Park Neighborhood Association, FEMA Environmental/Historic Preservation, and FEMA Public Assistance. Additional meetings were held on May 5, 2011 and May 17, 2011, to discuss measures to avoid, minimize, and or mitigate adverse effects to historic properties. The unexecuted MOA was sent on June 13, 2011 to the City of New Orleans for review and signature. FEMA anticipates the MOA will be signed and executed by FEMA in late June/early July 2011.

4.6 Hazardous Materials

The management of hazardous materials is regulated under various Federal and state environmental and transportation laws and regulations, including the Resource Conservation and Recovery Act (RCRA) the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Emergency Planning and Community Right-to-Know Act, the Hazardous Materials Transportation Act, and the Louisiana Voluntary Investigation and Remedial Action statute. The purpose of the regulatory requirements set forth under these laws is to ensure the protection of human health and the environment through proper management (identification, use, storage, treatment, transport, and disposal) of these materials. Some of these laws provide for the investigation and cleanup of sites already contaminated by releases of hazardous materials, wastes, or substances.

A database search prepared for the proposed project site revealed that there are no Louisiana Volunteer Remedial Program (VRP)/Brownfield sites located on the proposed site. No sites of concern were found during a review of the Electronic Document Management System (EDMS) database for other hazardous waste management and disposal, solid waste disposal, storage tank, enforcement, and other databases on the proposed site. There are no recorded oil and gas wells on or near the proposed property.

A search of the Louisiana Department of Environmental Quality (LDEQ) Leaking Underground Storage Tank (LUST) database revealed no recorded LUST sites within 0.25 miles of the site. A database search prepared for the proposed project site revealed that there are no Louisiana Volunteer Remedial Program (VRP)/Brownfield sites located within 0.5 miles of the site.

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

Alternative 2 – Reconstruction/repair in the same footprint: No hazardous materials, wastes, or substances (including contaminated soil or groundwater) have been identified at the same site. Reconstruction/repair of Wesley Barrow Stadium in substantially its same footprint would not disturb any hazardous materials or create any potential hazard to human health.

Alternative 3 – Reconstruction and reorientation at the original site - Proposed Action: Findings indicate that no hazardous materials, wastes, or substances (including contaminated soil or groundwater) have been identified at the proposed site. If hazardous constituents are unexpectedly encountered in the project area during the proposed construction operations, appropriate measures for the proper assessment, remediation and management of the contamination shall be initiated in accordance with applicable Federal, state, and local rules and regulations.

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

4.7 Environmental Justice

Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, was signed on February 11, 1994. The EO directs Federal agencies to make achieving environmental justice part of their missions by identifying and addressing, as appropriate, disproportionately high adverse human health, environmental, economic, and social effects of its programs, policies and activities on minority or low-income populations.

According to the most readily available (2000) U.S. Bureau of the Census Demographic Profile Highlights for New Orleans zip code 70126, 75.1 percent of the population is white, 12.3 percent is black, 12.5 percent is Hispanic, 3.6 percent is Asian, 0.9 percent is Native American, and 0.1 percent is Native Hawaiian. The median household income was \$30,627.

Alternative 1 – No Action: The No Action Alternative would not involve the implementation of a Federal program, policy or activity. Therefore, there will be no disproportionate adverse impacts to low-income or minority populations.

Alternative 2 – Reconstruction/repair in the same footprint: Reconstruction/repair of Wesley Barrow Stadium in substantially its same footprint would have no disproportionate adverse impacts to low-income or minority populations.

Alternative 3 – Reconstruction and reorientation at the original site - Proposed Action: The activity is not expected to have disproportionate adverse human health, economic, or social effects on minority or low-income populations. The activity would replace previous existing function to a currently developed parcel of previously-disturbed urban land, and much of the surrounding land near the proposed site is currently developed. Residential neighborhoods begin within 0.5 mile east and south of the proposed project site (see Figure 3). The proposed recreational facility would serve residents living throughout Orleans Parish.

5.0 CUMULATIVE IMPACTS

According to the Council on Environmental Quality (CEQ) regulations, cumulative impacts represent the “impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions, regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative effects can result from individually minor but collectively significant actions taking place over a period of time (40 CFR 1508.7).

The entire Louisiana Gulf Coast is undergoing recovery efforts after the 2005 hurricane season which includes demolition, reconstruction, and new construction, within private sector as well as Federal and state government. The USACE is undergoing one of the largest projects in their history, rebuilding the Greater New Orleans Hurricane and Storm Damage Risk Reduction System, which will improve approximately 350 miles of levees, concrete floodwalls, and other structures to meet 100-year level of risk reduction. The Louisiana Department of Transportation and Development (LADOTD) has an unusually large number of infrastructure improvements ongoing in and around Orleans Parish such as the Huey P. Long Bridge widening, the I-10 Twin Span Bridge replacement, and the I-10 and Causeway interchange improvements. The combination of all recovery development projects, including those mentioned above would have cumulative effects to Orleans Parish. However, it is anticipated that the Proposed Action would not have cumulative impacts on resources addressed in this EA.

6.0 CONDITIONS AND MITIGATION MEASURES

Based upon the studies and consultations undertaken in this EA, several conditions must be met and mitigation measures must be taken by City of New Orleans (Applicant) prior to and during project implementation.

- As of the release date of DFIRMs, unobligated FEMA Public Assistance grants for new construction and substantial improvements are to be built in accordance with a minimum base flood elevation (BFE) as established by the preliminary DFIRM. Orleans Parish DFIRMs were issued November 2008. Local ordinances based on ABFE maps may require a more stringent elevation requirement. New construction must be compliant with current codes and standards. City of New Orleans is required to coordinate with the local floodplain administrator regarding floodplain permit(s) prior to the start of any activities. At a minimum, the lowest floor of new structures must be elevated or flood proofed to or above the base flood elevation as provided by FEMA DFIRM. Future losses shall be eliminated, reduced or minimized by relocating building contents, materials and equipment to or above

the BFE specified the by 2008 preliminary DFIRM. All permits and certificates, and all the associated coordination, must be documented and provided to the GOHSEP and to FEMA as part of the permanent project file.

- Fill or borrow material used must be sourced from sites that do not contain any buried cultural materials (*i.e.*, wells, cisterns, foundations, basements, prehistoric Indian artifacts, human burials, and the like). If during the course of work, archaeological artifacts (prehistoric or historic) or human remains are discovered, City of New Orleans and/or its contractors must immediately stop work in the vicinity of the discovery and take all reasonable measures to avoid or minimize harm to the finds. The Applicant and GOHSEP must inform the FEMA Public Assistance program, who would in turn contact the FEMA Historic Preservation staff. The Applicant must not proceed with work until FEMA completes the necessary reviews required by Section 106 of NHPA. In addition, if unmarked graves are present, compliance with the Louisiana Unmarked Human Burial Sites Preservation Act is required. In that situation, the Applicant must notify the local law enforcement agency within 24 hours of the discovery, and notify FEMA and the Louisiana Division of Archaeology at (225) 342-8170 within 72 hours of the discovery. Failure to comply with these stipulations may jeopardize FEMA funding of the project.
- Project construction would involve the use of potentially hazardous materials (*e.g.*, petroleum products, cement, caustics, acids, solvents, paint, electronic components, pesticides, herbicides, fertilizers, treated timber) and may result in the generation of small volumes of hazardous wastes. Appropriate measures to prevent, minimize, and control spills of hazardous materials must be taken and generated hazardous and non-hazardous wastes are required to be disposed in accordance with applicable Federal, state and local regulations.
- The project has been found by the LDNR to be inside the Louisiana Coastal Zone; therefore, they require that a complete Coastal Use Permit Application package (Joint Application Form, locality maps, project illustration plats with plan and cross section views, etc.) along with the appropriate application fee be submitted to their office prior to construction.

7.0 PUBLIC INVOLVEMENT AND AGENCY CONSULTATION

FEMA is the lead Federal agency for conducting the NEPA compliance process for this Public Assistance project. It is the responsibility of the lead agency to conduct the preparation and review of NEPA documents in a way that is responsive to the needs of the Parish communities while meeting the spirit and intent of NEPA and complying with all NEPA provisions. As part of the development of early interagency coordination related to the proposed action, state and Federal resource protection agencies were contacted and FEMA distributed an informal scoping notification through a Solicitation of Views.

These agencies include the State Historical Preservation Officer, U. S. Fish and Wildlife Service, the U.S. Department of Agriculture Natural Resources Conservation Service, the Governor's Office of Homeland Security and Emergency Preparedness, Louisiana Department of Environmental Quality, U. S. Environmental Protection Agency, Louisiana Department of Natural Resources, U. S. Army Corps of Engineers, and National Oceanic & Atmospheric