

Draft Tiered Site-Specific Environmental Assessment

LOOP Security Command Center
Expansion
Lafourche Parish, Louisiana

Port Security Grant Program

Project # 2009-PU-T9-K023 (04) (5637)

March 2013



Federal Emergency Management Agency
Department of Homeland Security
500 C Street, SW
Washington, DC 20472

I. Background

In accordance with 44 Code of Federal Regulations (CFR) for the Federal Emergency Management Agency (FEMA), Subpart B, Agency Implementing Procedures, §10.9, a Programmatic Environmental Assessment (PEA) for Grant Programs Directorate Programs was prepared and a Finding of No Significant Impacts (FONSI) was issued in July 2010 (Appendix B), pursuant to Section 102 of the National Environmental Policy Act (NEPA) of 1969, as implemented by the regulations promulgated by the President's Council on Environmental Quality (CEQ; 40 CFR Parts 1500-1508). This Tiered Site-Specific Environmental Assessment (SEA) is being prepared in accordance with the July 2010 PEA. The focus of this Tiered SEA is on those areas of concern requiring additional discussion or analysis that are beyond the scope of the PEA.

The Louisiana Offshore Oil Port (LOOP) Security Command Center Expansion project consists of a modification to an existing Security Command Center (SCC) including a 4,000 square foot expansion and the installation of utilities, communication lines, and fencing. The expansion will be constructed in the parking lot area of the existing SCC facility and if needed in an adjacent open lot located at E 101 Place Cut Off, in Lafourche Parish, Louisiana (29.462952, -90.305997) (Appendix A).

II. Purpose and Need

The Greater Lafourche Port Commission has applied for Port Security Grant Program funding under application number 2009-PU-T9-K023 (04) (5637). The purpose of this program is to provide for activities which help to enhance the security and safety of ports in the United States.

The Greater Lafourche Port Commission has indicated that it needs additional space to manage transportation security incidents that might occur at any of the LOOP Deepwater Port Complex facilities.

III. Alternatives

Two project alternatives are proposed in this SEA: 1) No Action and 2) Proposed Action Alternative - LOOP Security Command Center Expansion in the City of Cut Off, Lafourche Parish, Louisiana.

Under the No Action Alternative, no changes would be made to the existing site. As a result of this alternative, the Greater Lafourche Port Commission would have limited abilities to manage transportation security incidents that might occur at any of the LOOP Deepwater Port Complex facilities.

The Proposed Action Alternative involves the modification to the existing SCC including a 4,000 square foot expansion. The 4,000 square foot expansion will provide 8 offices, a 24-person conference area equipped with Closed-circuit television (CCTV) access providing response personnel the ability to establish an incident command structure to manage a transportation security incidents, and a kitchen and eating area when engaged in long-term recovery efforts. A

proposed conduit trench, connecting the Proposed Action Alternative and the existing facility, would be approximately 2 feet to 3 feet deep and 1 foot wide. The facility will also allow response personnel to share incident information with agency fusion centers during a transportation security incident that might occur at any of the LOOP Deepwater Port Complex facilities. The facility will be constructed within a hurricane protection levee system that has a new lift under construction that will raise the levee to 16 feet above mean sea level. In addition, the building will be constructed 3 feet above mean sea level, matching the existing height of the SCC.

IV. Environmental Impacts

Discussion of the environmental impacts associated with the No Action Alternative is included in the July 2010 PEA. This document incorporates the PEA by reference. The PEA can be found in FEMA’s electronic library at <http://www.fema.gov/library/viewRecord.do?id=4143>. Environmental impacts are not anticipated to occur as a result of the No Action Alternative. Therefore, only the environmental impacts associated with the Proposed Action Alternative were evaluated in this Environmental Assessment.

FEMA’s environmental planning and historic preservation review reveals that all environmental areas of concern are appropriately accounted for in the PEA with the exception of floodplain impacts. Table 1-1 provides a summary of the findings for the environmental areas of concern that FEMA typically reviews.

Table 1-1. Summary of Other Environmental Areas of Concern

Area of Concern	No Action Alternative	Proposed Action Alternative
Historic properties	No effects.	FEMA made the determination of No Historic Properties Affected by this project. SHPO concurrence with this determination was received, dated July 25, 2012 (Appendix C).
Endangered and threatened species and critical habitat	No effects.	Based on the proposed scope of work and existing site conditions, FEMA made the determination that no endangered or threatened species will be affected by this project.
Migratory birds	No effects.	No effects.
Water quality	No effects.	No effects.
Coastal resources	No effects.	In accordance with the Louisiana Offshore Terminal Authority Superport Environmental Protection Plan, LOOP is considered a Special Area within the Louisiana Coastal Zone Management Area under the exclusive jurisdiction of the Louisiana Offshore Terminal Authority relative to construction activities within the Authority Development Program.
Wetlands	No effects.	No effects.
Low-income and minority populations	No effects.	Low income and minority populations are near project area. However, the proposed site improvements are anticipated to have beneficial impacts to the community.

In compliance with FEMA regulations implementing Executive Order 11988, Floodplain Management, FEMA is required to carry out the Eight-step decision-making process for actions that are proposed in the floodplain per 44 CFR §9.6. Executive Order 11988 requires federal agencies “to avoid to the extent possible the long and short term adverse impacts associated with the occupancy and modification of the floodplain and to avoid direct or indirect support of floodplain development wherever there is a practicable alternative.”

This Eight-step process is applied to the LOOP Security Command Center Expansion project at E 101 Place Cut Off, in Lafourche Parish, Louisiana. The steps in the decision making process are as follows:

Step 1 Determine if the Proposed Action Alternative is located in the Base Floodplain

The Proposed Action Alternative involves the modification to the existing SCC including a 4,000 square foot expansion and the installation of utilities, communication lines, and fencing. FEMA has determined that the Proposed Action Alternative is located in a 100-year floodplain, Zone A 16 (Areas of 100-year flood; base flood elevations and flood hazard factors determined), as depicted on FIRM Community Panel 2252020585C, dated April 17, 1985 (Appendix A).

Step 2 Early public notice (Preliminary Notice)

A public notice for the proposed LOOP Security Command Center Expansion project will be published in the regional newspaper, *The Lafourche Gazette*, as part of the notice of availability for this SEA.

Step 3 Identify and evaluate alternatives to locating in the base floodplain

The proposed LOOP Security Command Center Expansion project must take place in the floodplain because the project would be considered as functionally dependent use. Therefore no practicable alternative outside of the floodplain exists that would provide the Greater Lafourche Port Commission adequate opportunities to manage transportation security incidents that might occur at any of the LOOP Deepwater Port Complex facilities.

Step 4 Identify impacts of Proposed Action Alternative associated with occupancy or modification of the floodplain

Impact on natural function of the floodplain

The proposed LOOP Security Command Center Expansion project would not affect the functions and values of the 100-year floodplain nor would it impede or redirect flood flows. The LOOP Security Command Center Expansion project would be located in a partially developed area with existing infrastructure. When compared to the extensive floodplain area, the proposed LOOP Security Command Center Expansion project will have little potential to impact the floodplain. Therefore, the Preferred Action should not result in an increased base discharge or increase the flood hazard potential to other structures.

Impact of the floodwater on the proposed facilities

The proposed LOOP Security Command Center Expansion project has been designed to minimize impacts from flooding. The facility will be constructed within a hurricane protection levee system that has a new lift under construction that will raise the levee to 16 feet above mean sea level. In addition, the building will be constructed 3 feet above mean sea level, matching the existing height of the SCC. However, there is a potential that the LOOP Security Command Center Expansion project could be damaged if a catastrophic flooding event were to occur.

Step 5 Design or modify the Proposed Action Alternative to minimize threats to life and property and preserve its natural and beneficial floodplain values

In order to reduce the impact identified in Step 4 of flood hazards on the proposed new facilities, the proposed LOOP Security Command Center Expansion project will be constructed to an elevation of 3 feet above mean sea level as required by FEMA in flood hazard areas for this region.

The Applicant must follow all applicable local, state, and federal laws, regulations and requirements and obtain and comply with all required permits and approvals, prior to initiating work on this project. No staging of equipment or project activities shall begin until all permits are obtained.

Step 6 Re-evaluate the Proposed Action Alternative

Per the discussions above, the proposed site will be appropriately designed for the 100-year floodplain. The project would be considered as functional dependent use. The proposed LOOP Security Command Center Expansion project is intended to provide additional space to manage transportation security incidents that might occur at any of the LOOP Deepwater Port Complex facilities.

The Proposed Action Alternative will not aggravate the current flood hazard because the project would not impede or redirect flood flows. The project will not disrupt floodplain values because it will not change water levels in the floodplain. Therefore, it is still practicable to construct the proposed project within the floodplain. Alternatives consisting of locating the project outside the floodplain or taking “no action” are not practicable.

Step 7 Findings and Public Explanation (Final Notification)

In accordance with 44 CFR §9.12, the Greater Lafourche Port Commission must prepare and provide a final public notice 15 days prior to the start of construction activities. Documentation of the public notices are to be forwarded to FEMA for inclusion in the permanent project files.

Step 8 Implement the action

The Greater Lafourche Port Commission will incorporate into the design necessary mitigation efforts for building within a 100-year floodplain.

As a result of this Eight-step process, FEMA has determined that the LOOP Security Command Center Expansion project is in compliance with 44 CFR §9.6 because there are no practicable alternatives outside the 100-year floodplain.

V. Conditions

The following conditions must be met as part of this project. Failure to comply with these conditions may jeopardize the receipt of federal funding.

1. Significant change, addition, and/or supplement to the approved scope of work which alters the existing use and function of the structure, including additional work not funded by FEMA but performed substantially at the same time, will require re-submission of the application prior to construction to FEMA for re-evaluation under the National Environmental Policy Act.
2. The Greater Lafourche Port Commission must conclude the consultation with the local floodplain administrator and obtain required permits prior to initiating work. All coordination pertaining to these activities and applicant compliance with any conditions should be documented and copies forwarded to the state and FEMA for inclusion in the permanent project files.
3. In accordance with 44 CFR §9.12, the Greater Lafourche Port Commission must publish a public notice 15 days prior to the start of construction activities. Documentation of the public notice is to be forwarded to FEMA for inclusion in the permanent project files.
4. This review does not address all federal, state and local requirements. Acceptance of federal funding requires recipient to comply with all federal, state and local laws. Failure to obtain all appropriate federal, state and local environmental permits and clearances may jeopardize federal funding.
5. Excavated soil and waste materials will be managed and disposed in accordance with applicable local, state and federal regulations. If contaminated materials are discovered during the construction activities, the work would cease until appropriate procedures and permits can be implemented. Hazardous materials discovered, generated, or used during construction must be handled and disposed of in accordance with applicable local, state, and federal regulations.
6. If required, a Storm Water Pollution Prevention Plan will be prepared by the Greater Lafourche Port Commission, which will include implementation of appropriate Best Management Practices at the construction location.
7. During construction, appropriate erosion control methods will be implemented to prevent erosion and sediment deposits into surface waters. Following construction, areas that were disturbed will be seeded, replanted, or receive an equivalent erosion control protection.

8. Construction contractors will be required to water down construction areas to control dust when necessary. Fuel-burning equipment running times will be kept to a minimum and engines will be properly maintained.
9. In the event that archeological deposits, including Native American pottery, stone tools, bones, or human remains, are uncovered, the project shall be halted and the Applicant shall stop work immediately in the vicinity of the discovery and take reasonable measures to avoid or minimize harm to the finds. All archeological findings will be secured by the Greater Lafourche Port Commission and access to the sensitive area will be restricted by the Greater Lafourche Port Commission. The Applicant will inform the State Administrative Agency and FEMA immediately, and FEMA will consult with the State Historic Preservation Officer. Work in sensitive areas shall not resume until consultation is completed and until FEMA determines that the appropriate measures have been taken to ensure the complete project is in compliance with the National Historic Preservation Act and its implementing regulations.
10. Construction activities will be performed using qualified personnel trained in the proper use of the appropriate equipment, including appropriate safety precautions. Additionally, activities will be conducted in a safe manner and in accordance with the standards specified in the Occupational Safety and Health Administration regulations. The appropriate signage and barriers will be in place prior to construction activities to alert pedestrians and motorists of project activities.

In addition, The Greater Lafourche Port Commission will be required to comply with the conditions that are stated in the PEA FONSI, dated July 7, 2010, for the Proposed Action Alternative (see Appendix B).

VI. Correspondence and Agencies Consulted (see Appendix C)

- Louisiana Department of Culture, Recreation, and Tourism

VII. Public Comment

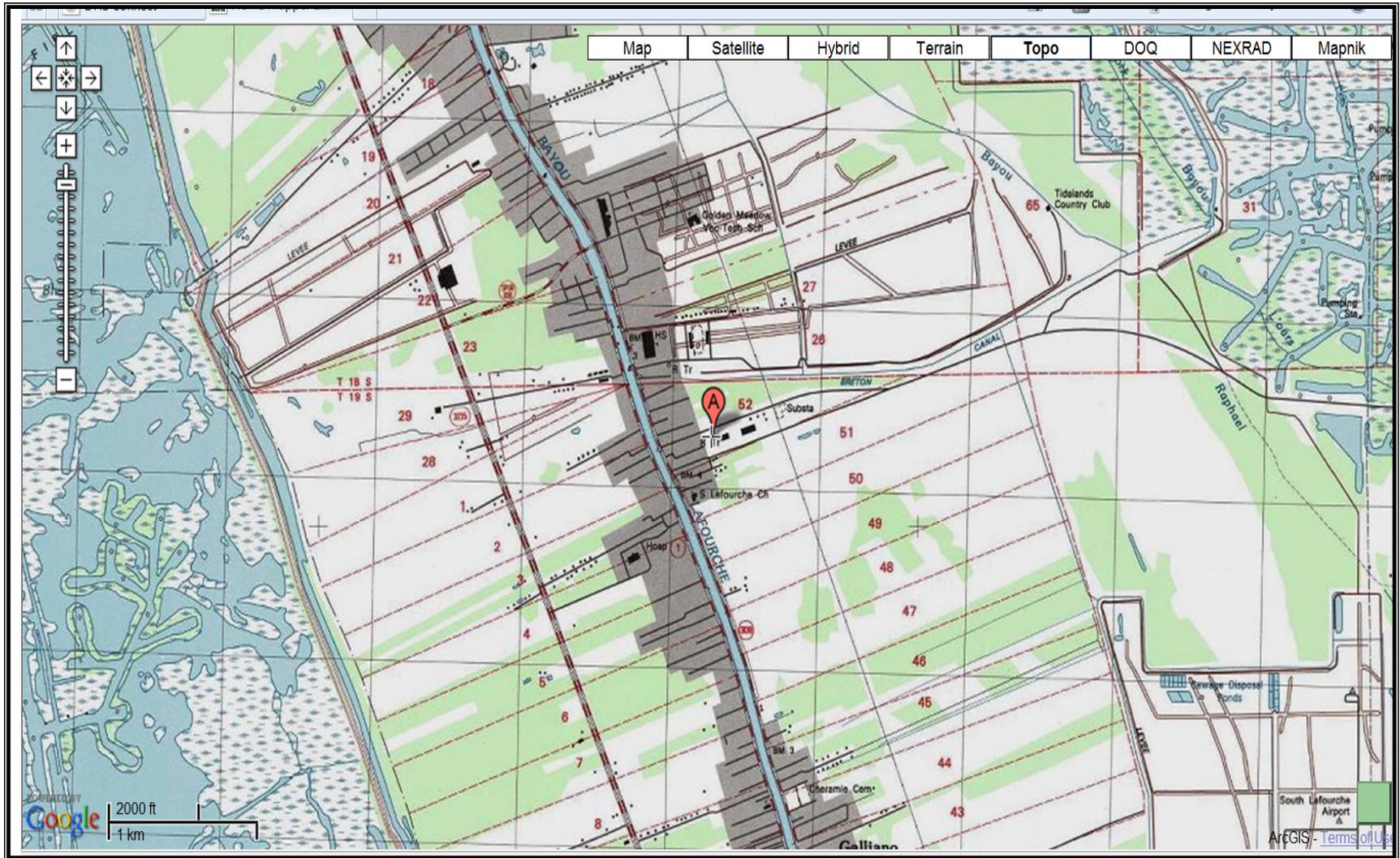
The public was notified of the availability of the Draft SEA through the publication of a public notice on March 24, 2013 in *The Lafourche Gazette*. The Draft SEA document was also made available for public review on the FEMA's website at <https://www.fema.gov/environmental-documents-and-public-notice-in-region-vi> and at the Lafourche Parish Public Library, South Lafourche Branch, located at 16241 East Main Street, Cut Off, LA 70345 between March 24, 2013 and April 8, 2013. A 15-day public comment period will commence on the initial date of the public notice. FEMA will consider and respond to all public comments in the Final SEA.

VIII. List of Preparers

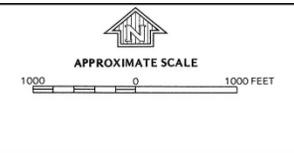
Kevin Jaynes, CHMM, Regional Environmental Officer, FEMA Region VI
Alan Hermely, EHP Specialist, FEMA Region VI

Appendix A

Figures and Photographs



Project Location Map



NATIONAL FLOOD INSURANCE PROGRAM

FIRM
FLOOD INSURANCE RATE MAP

**LAFOURCHE PARISH,
 LOUISIANA
 (UNINCORPORATED AREAS)**

PANEL 585 OF 925
 (SEE MAP INDEX FOR PANELS NOT PRINTED)

COMMUNITY-PANEL NUMBER
 225202 0585 C

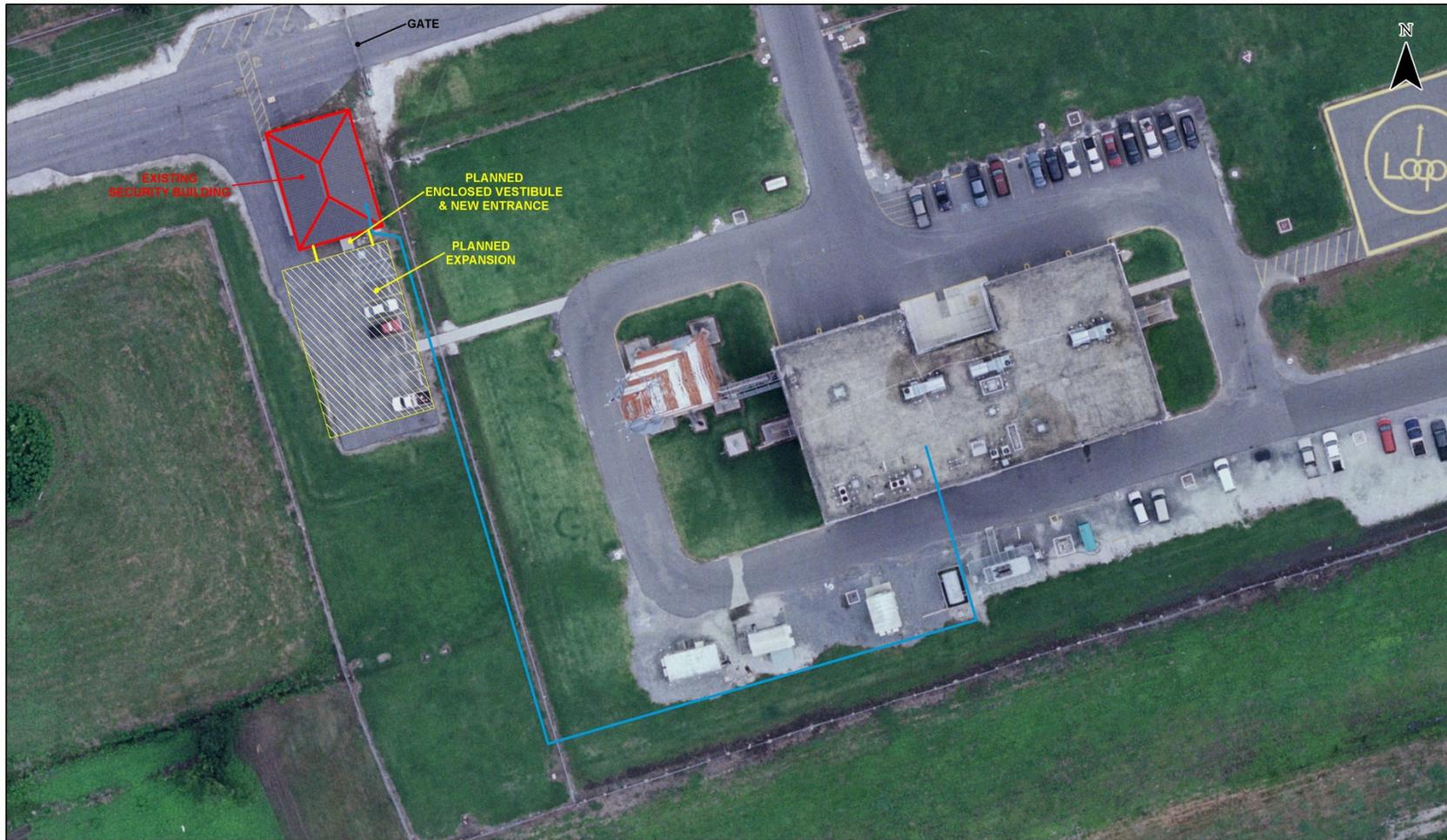
EFFECTIVE DATE:
 APRIL 17, 1985



Federal Emergency Management Agency

This is an official copy of a portion of the above referenced flood map. It was extracted using F-MIT On-Line. This map does not reflect changes or amendments which may have been made subsequent to the date on the title block. For the latest product information about National Flood Insurance Program flood maps check the FEMA Flood Map Store at www.msc.fema.gov

Floodplain Map



 <small>Morris P. Hebert, Inc.</small> <small>CONSULTING ENGINEERS ARCHITECTS PLANNERS</small>	LOOP LLC		DRAWN BY: RJB	SHEET: 1 OF 1
	CONDUIT PLAN		CHECKED BY: JBK	
			APPROVED BY: JBK	DATE: 07/06/2012
			GIS FILE: ExpansionSitePlan1	

Conceptual Map showing proposed project and conduit trench



Photo #1 – North View



Photo #2 – East View



Photo #3 – South View



Photo #4 – West View

Appendix B

Finding of No Significant Impact (FONSI)

For

**Final Programmatic Environmental Assessment
for the Evaluation of FEMA's Grant Programs
Directorate Programs**



FEMA

FEDERAL EMERGENCY MANAGEMENT AGENCY (FEMA)

FINDING OF NO SIGNIFICANT IMPACT (FONSI)

**FINAL PROGRAMMATIC ENVIRONMENTAL ASSESSMENT
FOR THE EVALUATION OF FEMA'S GRANT PROGRAMS
DIRECTORATE PROGRAMS**

BACKGROUND

In accordance with the National Environmental Policy Act (NEPA) of 1969, FEMA's regulations for implementing NEPA at 44 Code of Federal Regulations (CFR) Part 10, and the President's Council on Environmental Quality NEPA implementing regulations at 40 CFR Parts 1500-1508, FEMA prepared a draft Programmatic Environmental Assessment (PEA) to evaluate the potential impacts to the human environment resulting from typical actions funded by FEMA's Grant Programs Directorate (GPD) through the homeland security and emergency preparedness grant programs. These programs provide grant funding to States, territories, local and Tribal governments, and private entities to enhance their homeland security and emergency preparedness efforts. The PEA is incorporated by reference into this FONSI.

The PEA is intended for actions that are relatively minor in scale and typically considered for funding under the various GPD programs. The PEA evaluated two alternatives: no action and program implementation. Under the program implementation alternative, FEMA evaluated the following seven project types: planning; management and administration; training; exercises; purchase of mobile and portable equipment; modification of existing structures and facilities; and new construction. FEMA will develop Tiered Site-specific Environmental Assessments (SEA) for those GPD actions requiring evaluation under areas of concern not evaluated in this PEA, having impacts beyond those described in the PEA, requiring mitigation to reduce the level of impacts below significance, or otherwise requiring a Tiered SEA as identified in Table 5-1 in the PEA.

Notice of the availability of the PEA was published in the Federal Register on April 8, 2010, for a 30-day public comment period. Based on comments received, FEMA removed communication towers as a project type evaluated in the PEA. FEMA will develop a separate analysis tiered from this PEA to address communication towers and will provide a 15-day public comment period on that document.

CONDITIONS

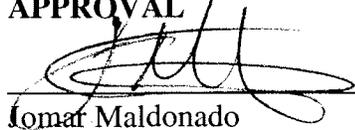
Actions under this PEA and FONSI must meet the following conditions. Failure to comply with these conditions would make the FONSI determination inapplicable for the project and could jeopardize the receipt of FEMA funding.

1. Excavated soil and waste materials will be managed and disposed of in accordance with applicable local, state, and federal regulations. If contaminated materials are discovered during construction activities, the work will cease until the appropriate procedures and permits are implemented.
2. The grantee and subgrantee will follow applicable mitigation measures as identified in Section 7 of the PEA to the maximum extent possible.
3. In the event that unmarked graves, burials, human remains, or archaeological deposits are uncovered, the grantee and subgrantee will immediately halt construction activities in the vicinity of the discovery, secure the site, and take reasonable measures to avoid or minimize harm to the finds. All archaeological findings will be secured and access to the sensitive area restricted. The grantee and subgrantee will inform FEMA immediately and FEMA will consult with the State Historic Preservation Officer (SHPO) and/or Tribal Historic Preservation Officer (THPO) or appropriate Tribal official. Construction work cannot resume until FEMA completes consultation and appropriate measures have been taken to ensure that the project is in compliance with the National Historic Preservation Act and other applicable Federal and State requirements.
4. The grantee and subgrantee must meet any project-specific conditions developed and agreed upon between FEMA and with environmental planning or historic preservation resource and regulatory agencies during consultation or coordination.
5. The grantee and subgrantee are responsible for obtaining and complying with all required local, State and Federal permits and approvals.

FINDING

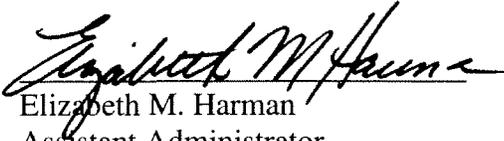
Based upon the information contained in the Final PEA, the potential impacts resulting from the seven project types analyzed in the PEA, and in accordance with FEMA's regulations at 44 CFR Part 10 and Executive Orders 11988 (Floodplain Management), 11990 (Protection of Wetlands), and 12898 (Environmental Justice), FEMA finds that the implementation of the proposed action will not have significant impacts to the quality of the human environment. Therefore, an Environmental Impact Statement (EIS) will not be prepared. This FONSI is based upon proposed actions fitting one of the seven project types described in the Final PEA and meeting all conditions prescribed for that particular project type.

APPROVAL



Omar Maldonado
Environmental Officer

Date 7/2/10



Elizabeth M. Harman
Assistant Administrator
Grant Programs Directorate

Date 7/6/10

Appendix C
Agency Consultation

U.S. Department of Homeland Security
Federal Emergency Management Agency
800 N Loop 288
Denton, Texas, 76309

RECEIVED FHC MAIL ROOM
FEMA, REGION V

2012 JUL 32 P 1:57



FEMA

July 6, 2012

Ms. Pam Breaux
Department of Culture, Recreation & Tourism
P.O. 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.

Pam Breaux 7-25-12
Pam Breaux Date
State Historic Preservation Officer

RE: Section 106 Consultation for LOOP Security Command Expansion: 2009-PU-T9-K023 (04) (5637)

Applicant: Greater Lafourche Port Commission

Location: East 101 Place, Cut Off, Lafourche Parish, Louisiana
N29.462952, W90.305997 (T19S R21E Section 52)

Dear Ms. Breaux,

The Greater Lafourche Port Commission has applied for funding from the Federal Emergency Management Agency (FEMA) through the Port Security Grant Program (PSGP) for the expansion of the existing building by 1,600 square feet, installation of utilities and communication lines, and fencing.

This project proposes a modification to the existing Security Command Center (c2005) and a 1,600 square foot expansion of that facility and installation of utilities and communication lines, and fencing. The modification to the existing facility will provide additional space for security personnel and the space necessary to adequately screen visitors and contractor personnel. The expansion will be constructed behind the current Security Command Center in the parking lot area. (Undertaking)

A review of photos and aerial map of proposed site location indicates the proposed project will take place in a previously disturbed area. Therefore, FEMA has determined there will be **No Historic Properties Affected** by the expansion of the existing building, installation of utilities, communication lines, and fencing.

