

Draft Environmental Assessment St. Louis Catholic High School Campus Change of Location Proposal

FEMA-DR-4559-LA

Lake Charles, Louisiana

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FEMA

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Federal Emergency Management Agency, Region VI
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LIST OF ACRONYMS AND ABBREVIATIONS

ADA	American with Disabilities Act
ACHP	Advisory Council on Historic Preservation
APE	Area of Potential Effects
BMP	Best Management Practices
CEQ	Council on Environmental Quality
CAA	Clean Air Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
C.F.R.	Code of Federal Regulations
DEA	Draft Environmental Assessment
DHS	U.S. Department of Homeland Security
DoA	U.S. Department of the Army
EIS	Environmental Impact Statement
E.O.	Executive Order
ESA	Endangered Species Act
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FONSI	Finding of No Significant Impact
FPPA	Farmland Protection Policy Act

HUD	U.S. Department of Housing and Urban Development
IA	Individual Assistance
IPaC	Information, Planning, and Conservation
LA GOHSEP	Louisiana Governor's Office of Homeland Security & Emergency Preparedness
LDEQ	Louisiana Department of Environmental Quality
LPDES	Louisiana Pollutant Discharge Elimination System
LDOA	Louisiana Division of Archaeology
MBTA	Migratory Bird Treaty
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NESHAP	National Emission Standards for Hazardous Air Pollutants
NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NWI	National Wetland Inventory
PA	Public Assistance; Programmatic Agreement
P.L.	Public Law
RCRA	Resource Conservation and Recovery Act
RHA	Rivers and Harbors Act
SFHA	Special Flood Hazard Area
SHPO	State Historic Preservation Office/Officer
TSCA	Toxic Substances Control Act
USACE	U.S. Army Corps of Engineers
U.S.C.	U.S. Code
USDA	U.S. Department of Agriculture
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service

1. Introduction

1.1 Project Authority

Hurricane Laura made landfall on August 27, 2020, at Cameron, Louisiana, as a Category 4 storm with sustained winds of more than 150 miles per hour and a minimum central pressure of 939 millibars. President Donald Trump declared a major disaster for the State of Louisiana (FEMA-DR-4559-LA) on August 28, 2020, authorizing the U.S. Department of Homeland Security's (DHS) Federal Emergency Management Agency (FEMA) to provide federal assistance in designated areas of Louisiana. This assistance is under the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), Public Law (P.L.) 93-288, as amended.

This Draft Environmental Assessment (DEA) has been prepared in compliance with the National Environmental Policy Act of 1969 (NEPA), FEMA's Instruction 108-1-1 and DHS Instruction 023-01-001-01, Rev. 1, pursuant to Section 102 of NEPA, as implemented by 40 CFR 1500-1508, promulgated by the President's Council on Environmental Quality (CEQ).

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

1.2 Background

On August 27, 2020, Lake Charles, Louisiana, experienced the arrival of Hurricane Laura, the strongest to hit Southwest Louisiana since 1851. The hurricane passed directly over Lake Charles, causing significant damage. It resulted in widespread destruction, damaging buildings, trees, and power infrastructure due to high winds. Storm surges compounded the devastation. Homes and businesses also suffered structural damage from falling trees and strong winds.

St. Louis Catholic School in Lake Charles sustained severe damage to most of its structures. The school community was displaced just before the start of a new school year. In response, the school quickly established a temporary facility using modular buildings, enabling students to resume in-person learning on campus. This temporary facility used FEMA PA funding under P/W 00546. The original facility is located at 1620 Bank St. in Lake Charles, LA (30.21808 °N, -93.20770 °W) (See: Figure 1. Aerial view of the original project site location in Lake Charles, Louisiana, and Figure 2. Topographic view of the original project site location in Lake Charles, Louisiana). The St. Louis High School facilities, including the Main Classroom Building, Old Gym (Landry Gymnasium), New Gym (Krajicek Gymnasium), Storage Building (Workshop), Covered Walkways, and all contents across the campus, have suffered damage beyond repair, rendering them a total loss. The remaining facilities, which encompass the Athletic Buildings, Indoor Batting Cages, Sprinkler Storage, and Football Field, have sustained damage that won't be repaired but will instead be replaced in conjunction with the new construction of the damaged facilities once the campus is relocated. Given the extensive damage, the decision was made to rebuild St. Louis Catholic High School on a 47-acre site on Corbina Road in east Lake Charles located approximately 4.0 miles southeast of the current location. The resilience of the St. Louis Catholic School community reflected the enduring spirit of the region as they faced the

daunting task of rebuilding following one of the most devastating hurricanes to affect Southwest Louisiana.

On August 28, 2020, Governor Edwards' request for a Major Disaster Declaration and Individual Assistance (IA) was approved covering a total of 23 parishes. FEMA subsequently approved IA for an additional five parishes, including Calcasieu. Due to significant storm-related damage, The Society of the Roman Catholic Church of the Diocese of Lake Charles proposed relocating and reconstructing the St. Louis High School Facilities at an alternative site, recognizing its critical role as an essential service. Designs for the new campus of St. Louis Catholic High School are currently in progress. The proposed location is east of the intersection of Corbina Road and James Court in Lake Charles (30.1817°N, -93.1586°W). The parcel is approximately 47 acres. (See: Figure 3. Aerial view of the proposed relocation site in Lake Charles, Louisiana, and Figure 4. Topographic view of the proposed relocation site). This construction project includes the development of new school buildings, a gymnasium, a courtyard, a central plant, a pavilion, detention ponds, and six sports fields/courts, such as a football field, baseball field, softball field, soccer field, practice field, and tennis courts.

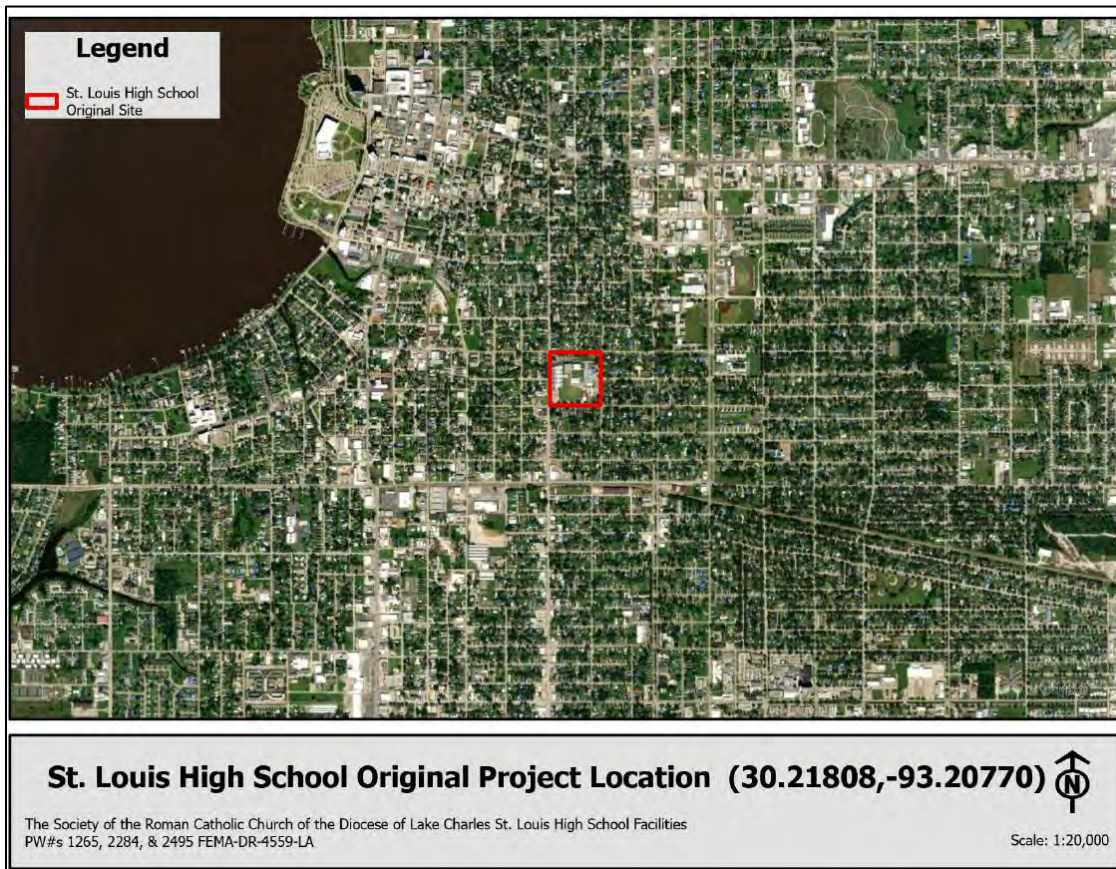


Figure 1 – Aerial view of the original project site location in Lake Charles, Louisiana. The location is highlighted in red.



Figure 2 – Topographic view of the original project site location in Lake Charles, Louisiana. The location is highlighted in red.

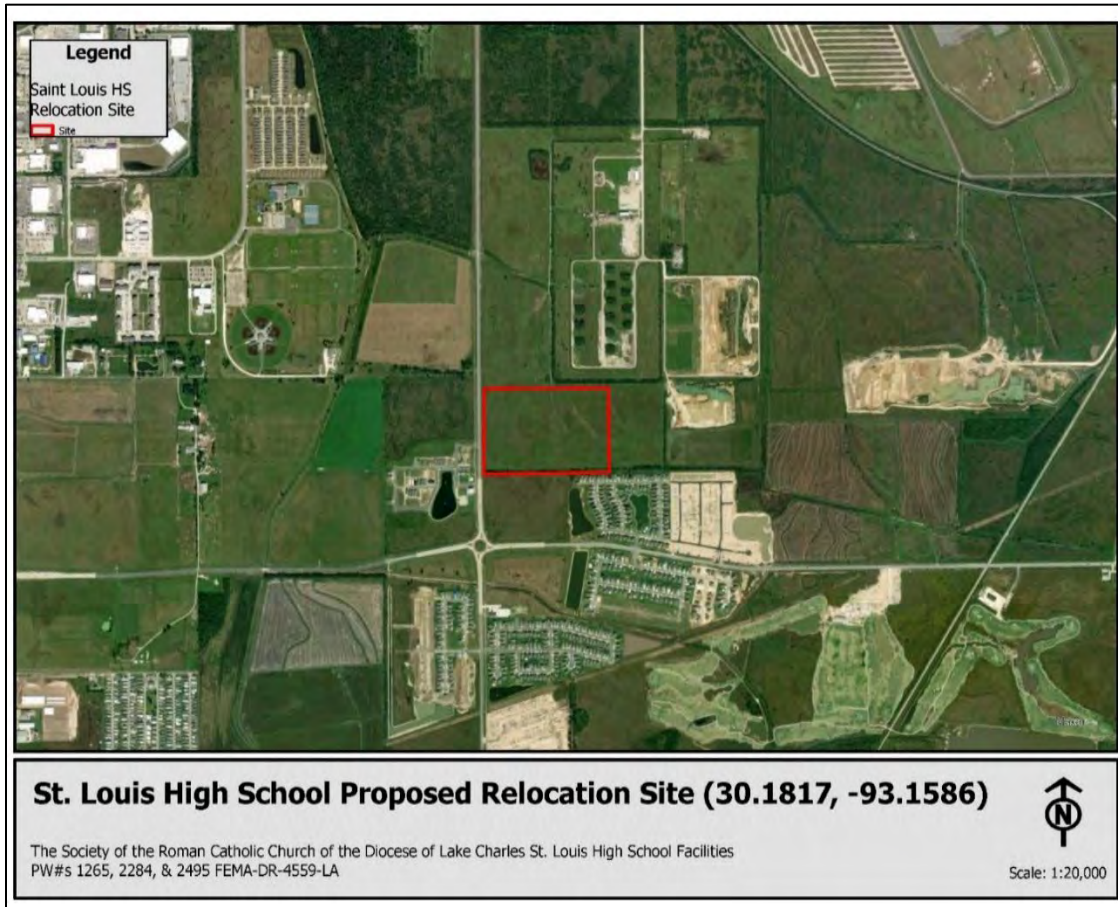


Figure 3 – Aerial view of the proposed relocation site in Lake Charles, Louisiana. The location is highlighted in red.

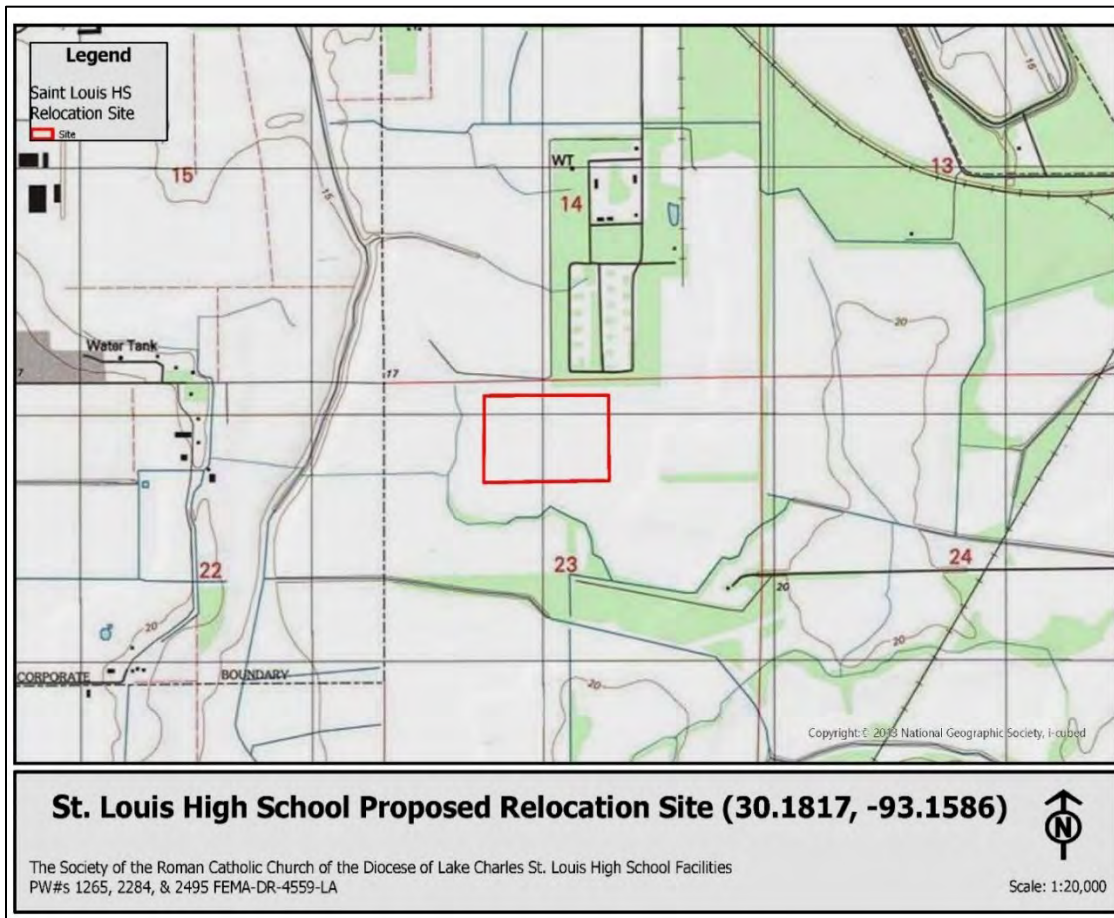


Figure 4 – Topographic view of the proposed relocation site. The location is highlighted in red.

2.0 Purpose and Need

The objective of FEMA’s Public Assistance (PA) Grant Program is to aid State, Tribal, and local governments, as well as certain types of private non-profit organizations, to ensure communities can quickly respond to, recover from, and mitigate major disasters and emergencies. The proposed action is necessitated by the severe damage caused by Hurricane Laura, with operations currently maintained in a temporary facility using modular buildings. The Diocese of Lake Charles is dedicated to the establishment of a top-tier Catholic school, striving to provide the highest educational standards for the St. Louis community. Rebuilding the school is crucial for maintaining access to quality Catholic education and addressing the extensive hurricane damage. This program enables grant funding in response to a Presidential major disaster declaration, ensuring that measures to mitigate future disaster risks are not neglected during the post-disaster reconstruction phase, as requested by the state's Governor.

3.0 Alternatives

3.1 Overview of Alternatives

The NEPA process involves assessing the environmental impacts of federal action and its alternatives. Per 40 CFR 1501.51(2), NEPA requires federal agencies to consider the effects of a proposed action and any reasonable alternatives on the human and natural environment. The purpose is to identify reasonable alternatives to the proposed action to allow for a meaningful outcome of the alternatives' effects on the human and natural environment. This section describes the alternatives considered in addressing the purpose and need. In this DEA, three alternatives will be evaluated: 1) the "No Action" Alternative, where no changes or interventions are made; 2) the "Identification of Alternative Eliminated from Further Considerations;" and 3) the "Proposed Action-Relocation," which involves constructing a new campus for St. Louis Catholic High School. FEMA will consider the following alternatives discussed below:

3.1.1 ALTERNATIVE 1 – NO ACTION: ST. LOUIS CATHOLIC HIGH SCHOOL LAKE CHARLES, LOUISIANA WILL REMAIN IN ITS ORIGINAL LOCATION WITHOUT ANY REPAIRS.

Under the "No Action" Alternative, no measures would be implemented to repair the existing damage or to relocate. As a result, St. Louis Catholic High School would remain in its current location without any improvements. This inaction would lead to students being displaced from adequate facilities, failing to meet the demands of the existing school population and local community.

3.1.2 ALTERNATIVE 2 – RELOCATION AND CONSTRUCTION OF A NEW CAMPUS ON AN ALTERNATE SITE (WEST OF CORBINA BLVD.) FOR ST. LOUIS CATHOLIC HIGH SCHOOL LAKE CHARLES, LOUISIANA

An alternative site northwest of the proposed project was initially considered but was subsequently excluded from further deliberation for several reasons (See Figure 5. Aerial view of the alternate relocation site). The site's smaller size made it unsuitable, and parts of it fell within a Zone A, Special Flood Hazard Area as per the FEMA National Flood Hazard Layer (FIRM Map: 22019C0485F), effective February 18, 2011. Furthermore, a comprehensive assessment using the National Wetland Inventory Mapper revealed the presence of a Riverine (R5UBH) wetland classification in the western vicinity of this location.

Note that opting for this alternative could pose a potential risk to the facilities in the future, especially in terms of vulnerability to flooding resulting from excessive rainfall. Further evaluation of this alternative will be conducted in subsequent sections to provide a more in-depth analysis of its implications.

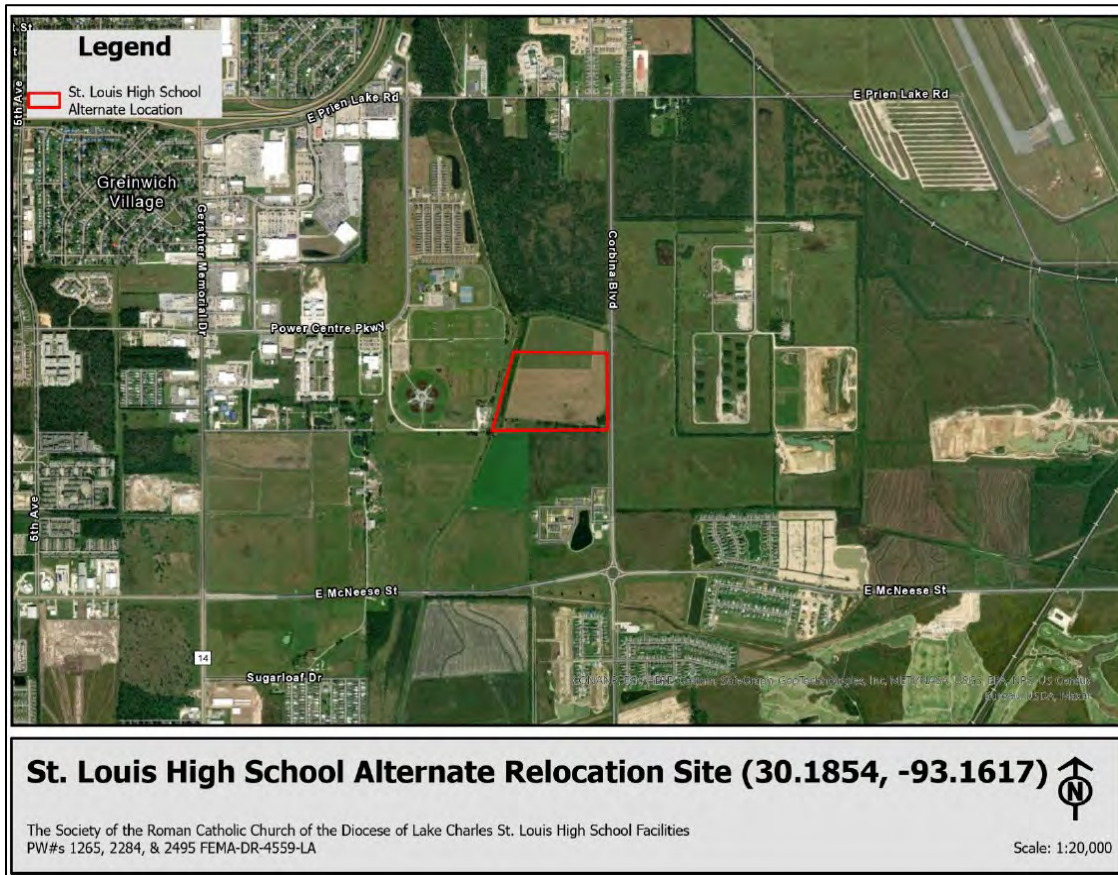


Figure 5 – Aerial view of the alternate relocation site. The location is highlighted in red.

3.1.3 ALTERNATIVE 3 – RELOCATION AND CONSTRUCTION OF A NEW CAMPUS FOR ST. LOUIS CATHOLIC HIGH SCHOOL IN LAKE CHARLES, LOUISIANA (PROPOSED ACTION)

Under this alternative, the project encompasses the construction of a new campus for St. Louis Catholic High School, which includes a new school building, a gymnasium, a courtyard, a central plant, a pavilion, and six sports fields/courts comprising a football field, baseball field, softball field, soccer field, practice field, and tennis courts (See Appendix 1. New St. Louis Catholic High School Campus Plans). Additionally, the accompanying infrastructure includes parking spaces and drives. The preparatory phase of the construction involves activities such as clearing vegetation, drying out silty soils, and removing loose, soft, or unsuitable materials. To ensure adequate site preparation, it is advised that the complete removal of topsoil or root mats in the proposed construction areas be carried out, with the removed materials either disposed of off-site or used for landscaping purposes. The estimation suggests a soil removal depth of approximately 24 inches for site preparation.

In cases where former utility lines and utility backfill are present, their removal from beneath the structures is recommended, followed by appropriate backfilling procedures. Excavation activities require the removal of roots, leaving only those measuring 1 inch in diameter or less. Depending on its intended use, the fill material should be classified as structural or general. Utility trenches

penetrating beneath the building must be effectively sealed to prevent water infiltration and migration. Effective drainage measures must be implemented during and after construction, including proper grading and incorporating gutters, downspouts, and splash blocks.

Maintaining a minimum slope of 5 percent away from the building for at least 10 feet beyond the building's perimeter is essential. Under ADA Standards for Accessible Design, adjustments to local grades may be necessary to meet flatwork access requirements. Additionally, a minimum 12-inch-thick layer of cohesive backfill should be placed around the exterior of foundation walls in unpaved/landscaped areas to mitigate surface water infiltration into underlying foundation support soils. To prevent damage to subgrade and foundation soils, avoid planting trees and vegetation with expansive root systems close to the structure: trees and shrubbery should be planted no closer than 1.5 times their expected height from the foundation's outer edges. Excavations for the proposed structures and athletic field surfaces are expected to be conducted using conventional construction equipment. The subgrade water content must be carefully managed before constructing floor slabs (See Appendix 2. DOLC New SLCHS Property Geo Tech Report).

This alternative meets the purpose and need of the action and will further be evaluated throughout this DEA.

4.0 Affected Environment and Alternatives Analysis

4.1 Geology and Soils

4.1.1 REGULATORY SETTING

The Farmland Protection Policy Act (FPPA: P.L. 97-98, §§ 1539-1549; 7 U.S.C. 4201, et seq.) was enacted in 1981 to minimize the impact federal actions may have on the unnecessary and irreversible conversion of farmland to non-agricultural uses. It assures that, to the extent possible, federal programs and policies are administered to be compatible with state and local farmland protection policies and programs. To implement the FPPA, federal agencies are required to develop and review their policies and procedures every two years. The FPPA does not authorize the federal government to regulate the use of private or nonfederal land or, in any way, affect the property rights of owners.

The Natural Resources Conservation Service (NRCS) is responsible for protecting significant agricultural lands from irreversible conversions that result in the loss of essential food or environmental sources. For purposes of the FPPA, farmland includes prime farmland, unique farmland, and land of statewide or local importance. Prime farmland is characterized as land with the best physical and chemical characteristics to produce food, feed, forage, fiber, and oilseed crops (USDA 1989). The scope of the FPPA extends beyond currently operational agricultural land to encompass various forms of land, such as forest areas, pastures, and crop fields, excluding water bodies or land under development. Projects falling under the purview of the FPPA are those with the potential to permanently convert farmland to non-agricultural use, whether through direct or indirect means and are either undertaken by a federal agency or aided by one. These projects may include but

are not limited to, federal initiatives leading to farmland conversion, as well as other endeavors supported by federal assistance.

4.1.2 EXISTING CONDITIONS

The property is located within an area of Beaumont Alloformation (Ppbe) of Prairie Terrace deposits of the Pleistocene Age. Beaumont Alloformation consists of plain deposits of late to middle Pleistocene streams: the oldest alloformation and topographically highest surface or the Prairie Allogroup units of southwestern Louisiana. It exhibits the relict channels of the Red and Calcasieu rivers and includes deposits of the Ingleside barrier trend within the Lake Charles quadrangle. The Pleistocene Age deposits typically consist of medium stiff to very stiff tan and light gray silty clays and clays with silt and sand layering. The soils within the Prairie Terrace deposits typically provide good foundation support for relatively light to moderately loaded structures, are over-consolidated, and are normally only marginally compressible. In some areas that are very dry and desiccated, the potential for expansive properties exists, but these conditions are not typical of the Prairie Terrace deposits (See Figure 6. Generalized geology map for Louisiana). The topography of the proposed project site is generally flat (Appendix 2. SLCHS Property Geo Tech Report).

The soil in Calcasieu Parish varies widely in its potential for major land uses and urban development. According to the United States Department of Agriculture (USDA's) NRCS Web Soil Survey, the soils in the proposed location site include the Mowate-Vidrine complex (97.9%), and a smaller area of Crowley-Vidrine complex (2.1 %) (See Figure 7. USDA NRCS Web Soil Survey Map and Appendix 2. SLCHS Property Geo Tech Report). Mowata-Vidrine complex consists of a combination of somewhat poorly to poorly drained soils in flat coastal plains, with a range of natural drainage classes and seasonal water saturation zones. These soils have a depth to a root restrictive layer greater than 60 inches, making them versatile for different land uses, and possess a moderate shrink-swell potential. Crowley-Vidrine complex soils are found in flat coastal plains and exhibit a somewhat poorly drained natural drainage class. It is characterized by somewhat poorly drained soils with deep root-restrictive layers and a parent material derived from igneous, metamorphic, and sedimentary rock. Both the Mowata-Vidrine complex and the Crowley-Vidrine complex are prime farmlands.

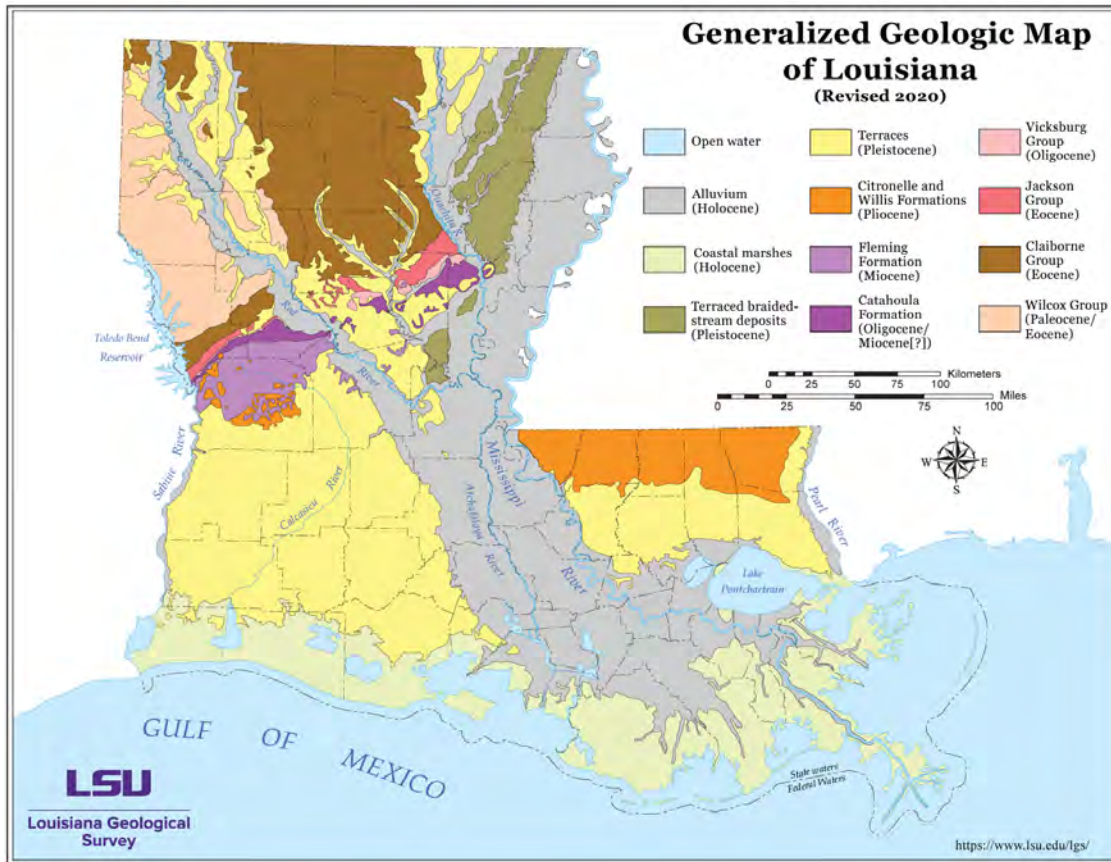


Figure 6 – Generalized geology for Louisiana.



Figure 7- USDA NRCS Web Soil Survey Map

4.1.3 ENVIRONMENTAL CONSEQUENCES

Alternative 1. No Action: St. Louis Catholic High School Lake Charles, Louisiana Will Remain in its Original Location.

Implementation of the “No Action” alternative would have no impact on geology or soils, and no impacts on prime, unique, statewide, or locally important farmland.

Alternative 2 – Relocation and construction of a new campus on an alternate site (west of Corbina Blvd.) for St. Louis Catholic High School Lake Charles, Louisiana

The types of soils at this site are Crowley-Vidrine complex (67.7%), Mowata-Vidrine complex (24.9%), and Midland silty clay loam (3.5%) (See Figure 8. Soils at the Alternate Project Site). Midland silty clay loam is typically found in open depressions on terraces within coastal plains. It is characterized by its poorly drained natural drainage class, high water-holding capacity, and low water movement in the most restrictive layer. While these soils are rarely flooded, they exhibit a seasonal zone of water saturation at a depth of 15 inches during specific months. All three soils are classified as prime farmlands.

Construction of the school’s facilities at this site would temporarily impact soil, primarily as part of site preparation and building construction. Soils will be exposed during grading and trenching for utilities. Additionally, installation of the proposed structure would result in compaction of all underlying soil, and the removal of other soil.

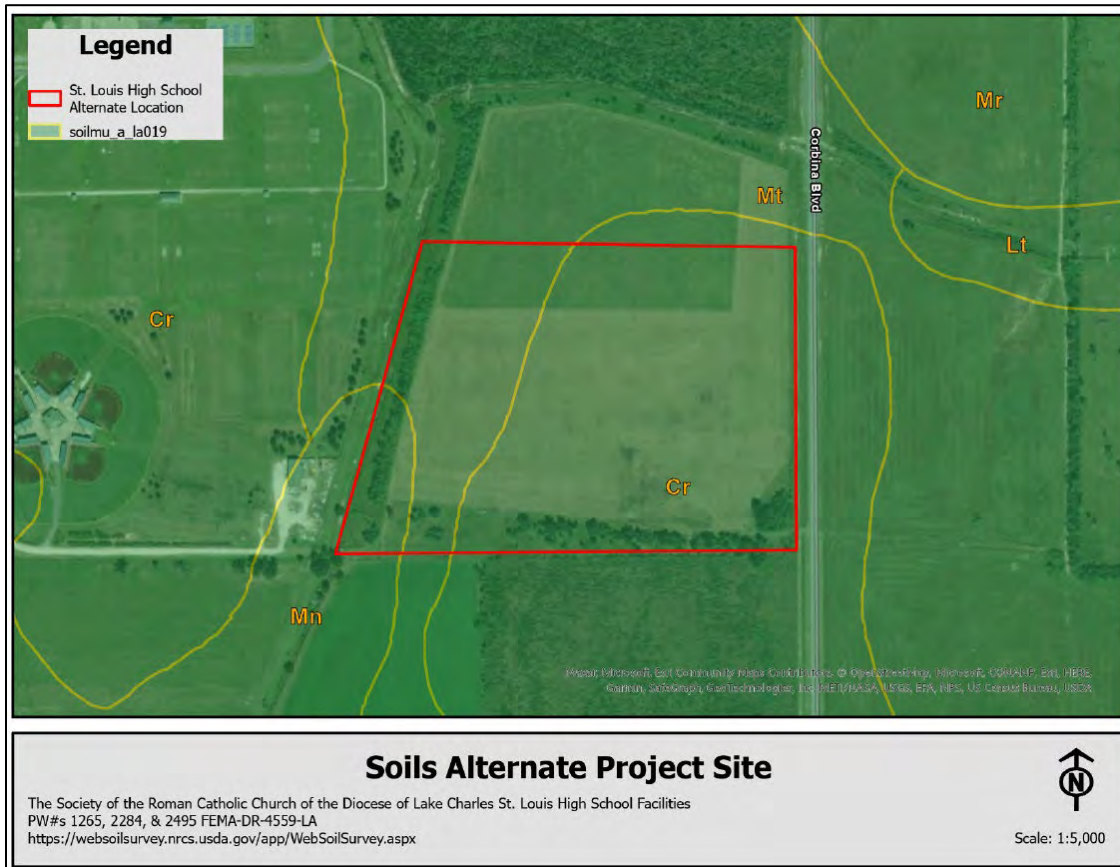


Figure 8. Soils at the Alternate Project Site

Alternative 3 – Relocation and construction of a new campus for St. Louis Catholic High School in Lake Charles, Louisiana (Proposed Action)

The soil composition at this location includes the Mowata-Vidrine complex (41.1%) and the Crowley-Vidrine complex (4.7%), both of which are considered prime farmlands (See Figure 9. Soils at the Proposed Project Site). The construction of the school's facilities in this area will have a temporary impact on the soil, mainly during site preparation and building construction activities. These activities will involve the exposure of soil during grading and trenching for utilities, as well as the compaction of the underlying soil and the removal of certain soil components as the proposed structure is installed.

FEMA initiated consultation with the NRCS regarding potential impacts to prime and unique farmland as defined in 7 CFR § 658.2(a) and received final comments and the completed Farmland Conversion Impact Rating on December 20, 2023.

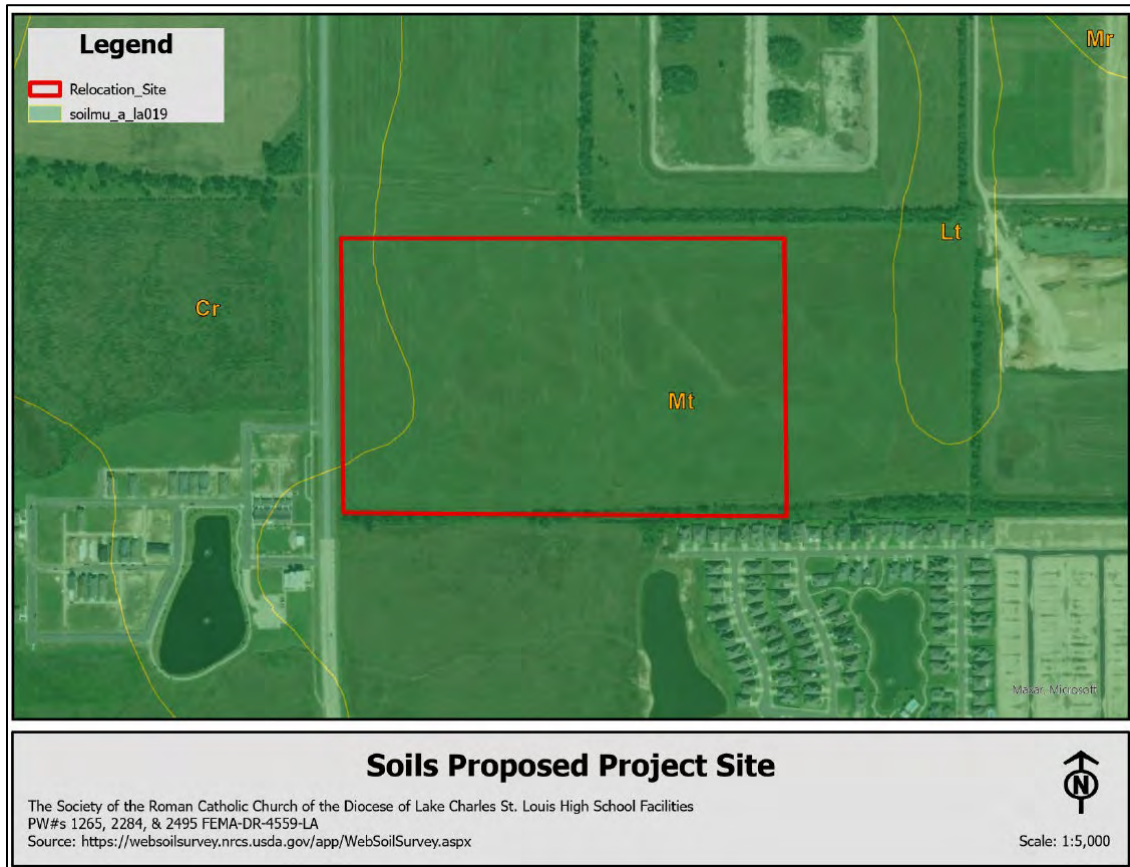


Figure 9. Soils at the Proposed Project Site

4.2 Land Use and Zoning

4.2.1 REGULATORY SETTING

4.2.1.1 Coastal Zone Management Act

The Coastal Zone Management Act (CZMA) of 1972 (16 USC § 1451 et seq.) is administered by the Department of Commerce's Office of Ocean and Coastal Resource Management within the National Oceanic and Atmospheric Administration (NOAA). It applies to all coastal states and states bordering the Great Lakes. The CZMA was established to help prevent any additional loss of living marine resources, wildlife, and nutrient-enriched areas; alterations in ecological systems; and decreases in undeveloped areas available for public use. The CZMA gives states the authority to determine whether the activities of governmental agencies are consistent with federally approved coastal zone management programs. Each state coastal zone management program must include provisions protecting coastal natural resources, fish, and wildlife; managing development along coastal shorelines; providing public access to the coast for recreational purposes; and incorporating public and local coordination for decision-making in coastal areas. This voluntary federal-state partnership

addresses coastal development, water quality, shoreline erosion, public access, protection of natural resources, energy facility siting, and coastal hazards.

The CZMA requires that coastal states develop a coastal zone management plan and that any federal agency conducting or supporting activities affecting the coastal zone conduct or support those activities in a manner consistent with the approved state plan or program. To comply with the CZMA, a federal agency must identify activities that would affect the coastal zone, including development projects, and review the state coastal zone management plan to determine whether a proposed activity would be consistent with the plan.

The Federal Consistency provision, contained in Section 307 of the CZMA, allows affected states to review federal activities to ensure that they are consistent with the state's coastal zone management plan. This provision also applies to non-federal programs and activities that use federal funding and that require federal authorization. Any activities that may influence any land or water use or any natural resources in the coastal zone must conform to the enforceable policies of the approved state coastal zone management program. NOAA's regulations in 15 CFR Part 930 provide the procedures for arriving at or obtaining a consistency determination.

4.2.1.2 Louisiana State and Local Coastal Resources Management Act

According to the CZMA, the State and Local Coastal Resources Management Act of 1978 (R.S. 49:214.21 et seq. Act 1978, No. 361) is the State of Louisiana's legislation creating the Louisiana Coastal Resources Program (LCRP). The LCRP establishes policy for activities including construction in the coastal zone, defines and updates the coastal zone boundary, and creates regulatory processes. The LCRP is under the authority of the Louisiana Department of Natural Resources (LDNR) Office of Coastal Management (OCM). If a proposed action is within the Coastal Zone boundary, FEMA requires contacting the OCM for a permit. The OCM will review the eligibility of the project concurrently with its review by other regulatory agencies. The mechanism employed to review these projects is the application of a Coastal Use Permit (CUP). Per the CZMA, all proposed federal projects within the coastal zone must undergo a Consistency Determination by OCM for that project's consistency with the state's Coastal Resources Program (i.e., LCRP) (LDNR 2016).

4.2.1.3 Local Regulatory Framework

The Calcasieu Parish Police Jury regulates land use under the Calcasieu Parish Zoning Ordinance (Calcasieu PPJ, Code of Ordinances §26 Article III.). While Calcasieu Parish has local coastal zone management regulations, the project area is not within the designated coastal zone of Calcasieu Parish.

4.2.2 EXISTING CONDITIONS

Based on the land use and zoning data sourced from the official government City of Lake Charles website, it has been established that the project area falls within the designation of a mixed-use district (See Figure 10. Zoning Proposed Project Site). This district, under the zoning ordinance of the city of Lake Charles Sec. 5.303, is strategically planned to accommodate a diverse array of land uses within a harmonious neighborhood characterized by a well-calibrated blend of residential and nonresidential activities. It is noteworthy that the district's distinctive character is envisaged to be intricately defined

on a block-by-block basis, with the conservation of this character facilitated through the implementation of buffer yards, as opposed to stringent limitations on land use.

According to the provisions outlined in Ordinance No. 4526, the comprehensive zoning law of the City of Lake Charles, Louisiana, the selected mixed-use district permits a range of specific land uses. These include but are not limited to (a) Single-family attached and detached dwellings, provided the density does not exceed twelve (12) dwelling units per acre. (b) Schools. (c) Churches. (d) Public uses. (e) Home occupations. (f) Home businesses, subject to the conditions stipulated in Section 5-302(3)(a)(ii). (g) Accessory uses. (h) Agriculture. (i) Bed and Breakfast facilities.

Given the permissible land uses within the mixed-use district, the proposed establishment of a school within the specified location aligns with the regulations outlined in Ordinance No. 4526.

Additionally, The Calcasieu Parish Police Jury regulates land use under the Calcasieu Parish Zoning Ordinance (Calcasieu PPJ, Code of Ordinances §26 Article III.). While Calcasieu Parish has local coastal zone management regulations, the project area is not within the designated coastal zone of Calcasieu Parish.

Consequently, the project follows the zoning provisions and is well-suited to the intended purpose and character of the designated area.

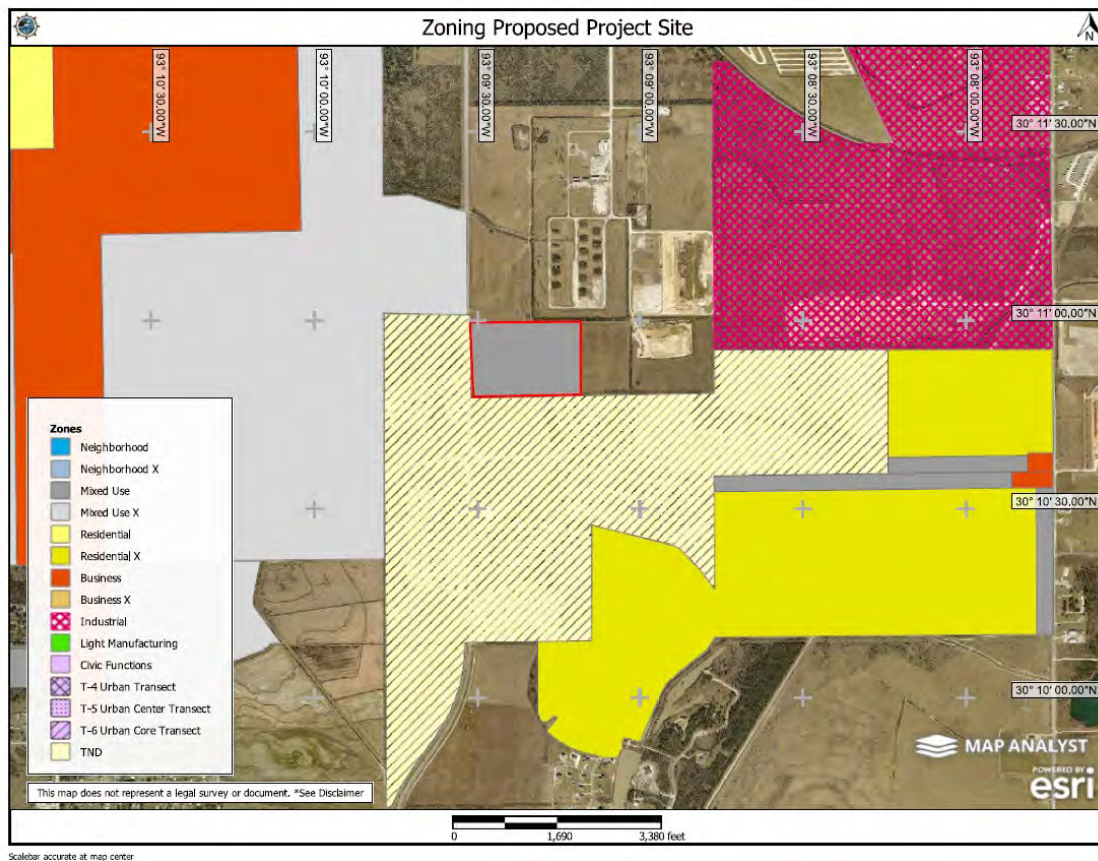


Figure 10 – Zoning Proposed Project Site.

4.2.3 ENVIRONMENTAL CONSEQUENCES

Alternative 1 – No Action: St. Louis Catholic High School Lake Charles, Louisiana Will Remain in its Original Location.

The “No Action” alternative entails the preservation of the existing zoning designation as stipulated in Ordinance No. 2526, with no proposed modifications or alterations to the site.

Alternative 2 – Relocation and construction of a new campus on a former site for St. Louis Catholic High School in Lake Charles, Louisiana

In Alternative 2, the relocation of a school to a smaller location is consistent with the mixed-use district designation specified in Ordinance No. 2526 (See Figure 11. Zoning Alternate Relocation Site). The area was likely a former agricultural pasture bordered by a highway and drainage ditches used for hay production and cattle grazing. This proposed project area is situated outside the LDNR-designated coastal zone boundary and is not subject to the regulations of Calcasieu Parish's Coastal Zone Management (Ordinance No. 6143), relieving the State and Local Government from specific mandated actions.

However, the selected area for the St. Louis Catholic High School is deemed unsuitable due to constraints such as limited space and potential impacts on a riverine wetland, which have been thoroughly evaluated in the study.

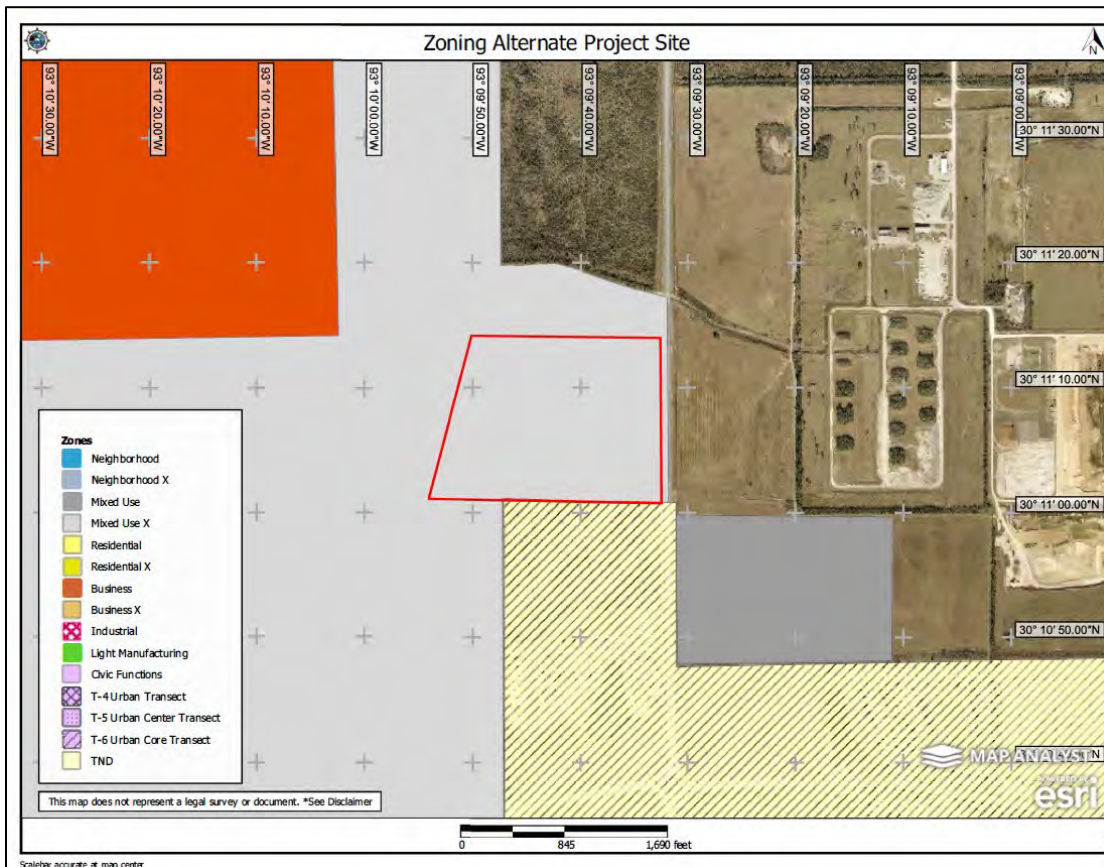


Figure 11 – Zoning Alternate Relocation Site

Alternative 3 – Relocation and construction of a new campus on an alternate site (west of Corbina Blvd.) for St. Louis Catholic High School in Lake Charles, Louisiana (Proposed Action)

The isolated wetlands within the proposed Alternative 3 project area, situated outside the coastal zone boundary, are not subject to the regulations of Calcasieu Parish's Coastal Zone Management (Ordinance No. 6143), relieving the State and Local Government from specific mandated actions.

The Proposed Action aligns with the city's zoning ordinance in the long term. Construction of the school on the site will cause temporary land disruption, especially during the initial phases of site preparation and building construction. This process will expose the land during tasks such as grading and trenching for utility installation. Moreover, the construction of the intended structures will result in the compression of the underlying land and the removal of specific portions of the site (See Figure 10. Zoning Proposed project site).

4.3 Floodplain

4.3.1 REGULATORY

Executive Order (EO) 11988 (Floodplain Management) requires federal agencies to avoid direct or indirect support or development within the 100-year floodplain (or 500-year floodplain for critical facilities) whenever there is a practicable alternative. FEMA's regulations for complying with EO 11988 are found in 44 CFR Part 9, Floodplain Management and Protection of Wetlands (1980).

4.3.2 EXISTING CONDITIONS

A significant proportion of Calcasieu Parish, totaling 46%, is situated within high-risk flood hazard areas. Traditionally, regions adjacent to water bodies are most susceptible to flooding, but in the case of Calcasieu Parish, there is limited land outside of the 100 or 500-year floodplain (Ifma.org). This unique geographical situation amplifies the risk and consequences of flooding for the region. Following the devastating impact of Hurricane Laura, the effects of flooding have been particularly severe and financially burdensome for St. Louis Catholic High School, as the inundation has extended to areas typically considered outside the most vulnerable flood zones, exacerbating the challenges faced by the institution.

The National Flood Insurance Program (NFIP), a federal initiative established in 1968, addresses the increasing flood risk in the region. The NFIP requires each local government to join the flood insurance program by adopting flood hazard rate maps and an ordinance to guide development within the mapped floodplains. It plays a pivotal role in offering flood insurance to homeowners, renters, and businesses within participating communities, such as those in Calcasieu Parish. The City of Lake Charles joined the National Flood Insurance Program (NFIP) on October 16, 1979, with the adoption of its floodplain management ordinance, Flood Insurance Rate Maps, and Floodway Maps.

Thus, the NFIP is an indispensable program in Calcasieu Parish, Louisiana, offering flood insurance and advocating responsible floodplain management while strengthening the community's ability to reduce flood-related risks and respond effectively to the persistent threat of flooding. Subsequently, the City of Lake Charles became a participant in the Community Rating System in 2004 by obtaining a Class 9 rating, which gives the citizens a discount on their flood insurance premium. The information on the flood insurance rate maps was obtained from the studies prepared by the U.S. Army Corp of Engineers under contract with FEMA.

The St. Louis Catholic High School is located within an area of the 500-year floodplain. The effective FIRMette panel covering the site location is 22019C0480F, dated February 18, 2011 (See Figure 12. Actual Site Location Flood Hazards). This FIRMette indicates that the project area is located within Flood Zone "X" (shaded), an area of moderate flood hazard, usually between the limits of the 100-year and 500-year floods.

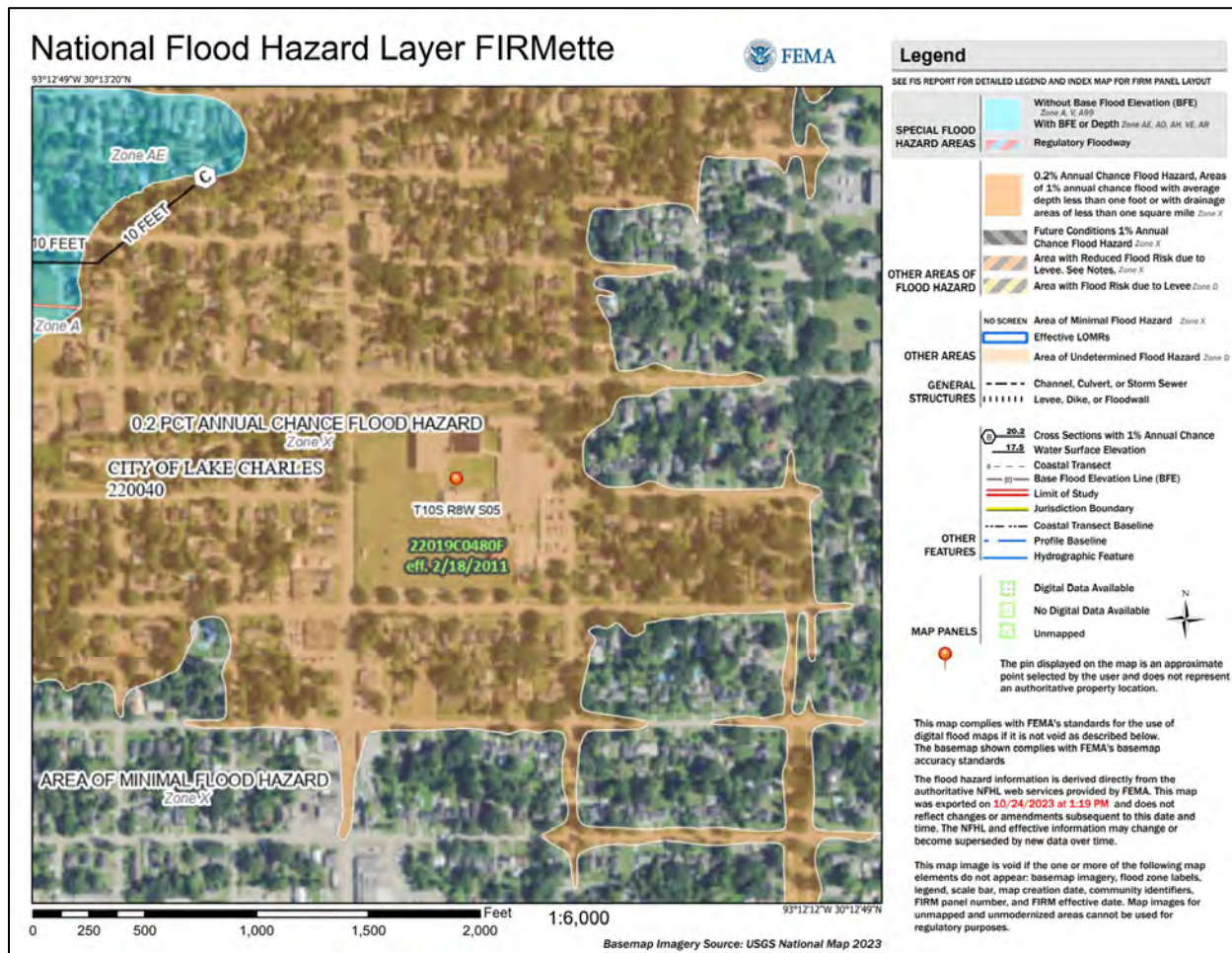


Figure 12 – Actual Site Location Flood Hazards

4.3.3 ENVIRONMENTAL CONSEQUENCES

Alternative 1 – No Action: St. Louis Catholic High School Lake Charles, Louisiana Will Remain in its Original Location.

Under the “No Action” alternative, there would be no determinable impact on flood elevations.

Alternative 2 – Relocation and construction of a new campus on an alternate site (west of Corbina Blvd.) for St. Louis Catholic High School in Lake Charles, Louisiana

The site is in a rural, empty location that currently serves as having a low capacity for groundwater recharge, biological habitat, cultural value, and forestry value. Under this alternative, the proposed facility would not closely match the prior capacity of the pre-existing facility's footprint due to its smaller size. Portions of the project may be located within the 100-year floodplain. The project is located within an A zone, an area of 100-year flooding, per the Flood Insurance Rate Map (FIRM) panel

22019C0495F, dated February 18, 2011 (Figure 13. Alternate Project Site Flood Hazards). The project is not likely to result in any potential direct impacts that will adversely affect the natural values and function of floodplains. However, due to the location of the project, the risk of flood loss may likely occur.

Per 44 CFR 9.11(d)(6), no project should be built to a floodplain management standard that is less protective than what the community has adopted in local ordinances through their participation in the National Flood Insurance Program. The applicant is required to coordinate with the local floodplain administrator regarding floodplain permit(s). All coordination with the local floodplain administrator and applicant compliance should be documented, and copies forwarded to the FEMA for inclusion in the permanent project files. Per 44 CFR 9.11 (d) (9), mitigation or minimization standards must be applied, where possible.

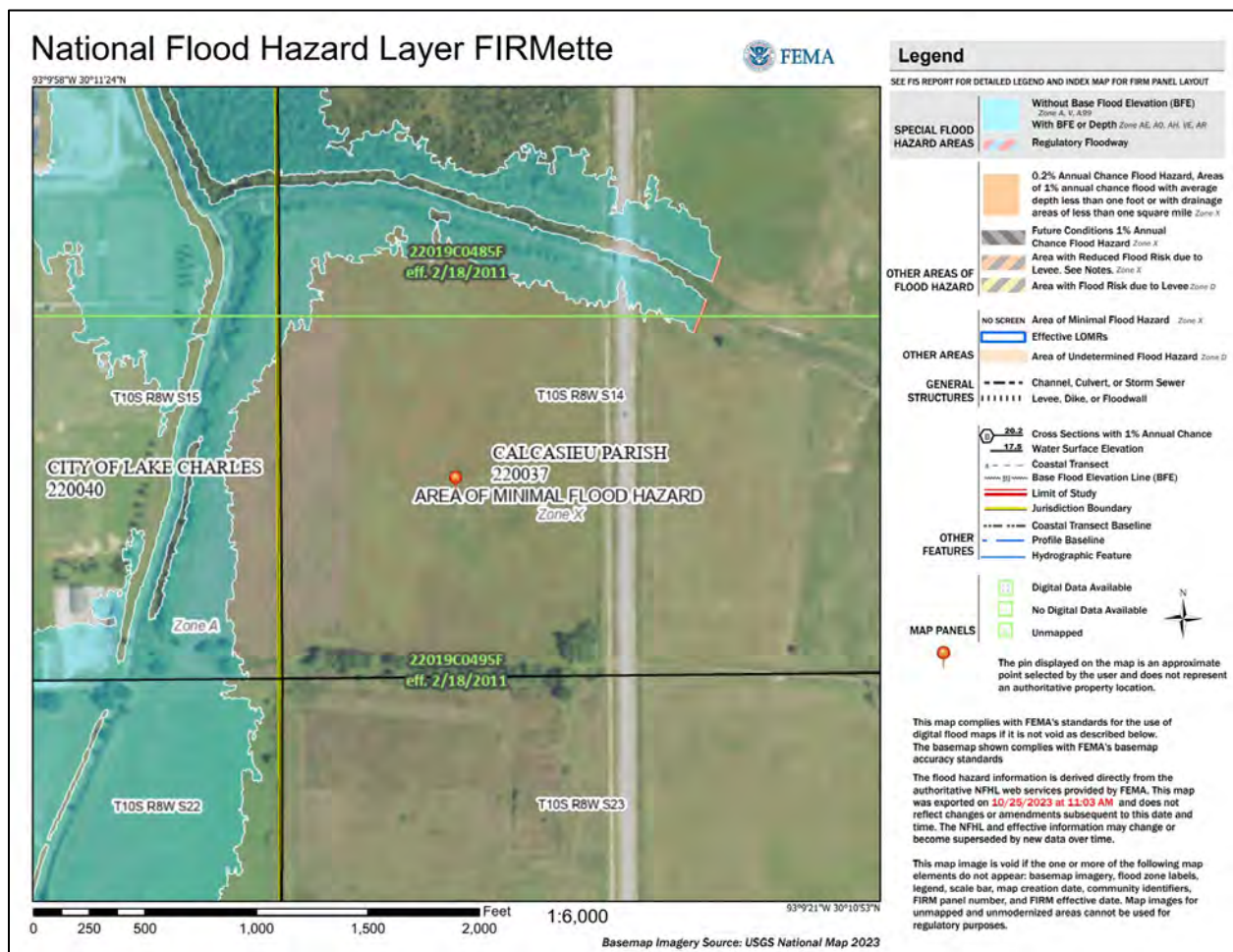


Figure 13 – Alternate Project Site Flood Hazards

Alternative 3 – Relocation and construction of a new campus for St. Louis Catholic High School in Lake Charles, Louisiana (Proposed Action)

The site is in a rural, empty location that currently serves as having a low capacity for groundwater recharge, biological habitat, cultural value, and forestry value. The proposed facility will closely match the prior capacity of the pre-existing facility's footprint. Per Flood Insurance Rate Map (FIRM) panel 22019C0495F, dated February 18, 2011, the project is located outside the 100- or 500-year floodplain, special flood hazard area and the activity does not adversely affect floodplain values (See Figure 14. Proposed Project Site Flood Hazards). Mitigation measures will be implemented to limit future flood loss.

Per 44 CFR 9.11(d)(6), no project should be built to a floodplain management standard that is less protective than what the community has adopted in local ordinances through their participation in the National Flood Insurance Program. The applicant is required to coordinate with the local floodplain administrator regarding floodplain permit(s). All coordination with the local floodplain administrator and applicant compliance should be documented, and copies forwarded to the Governor's Office of Homeland Security and Emergency Preparedness (LA GOHSEP) and FEMA for inclusion in the permanent project files. Per 44 CFR 9.11(d)(9), mitigation or minimization standards must be applied, where possible.

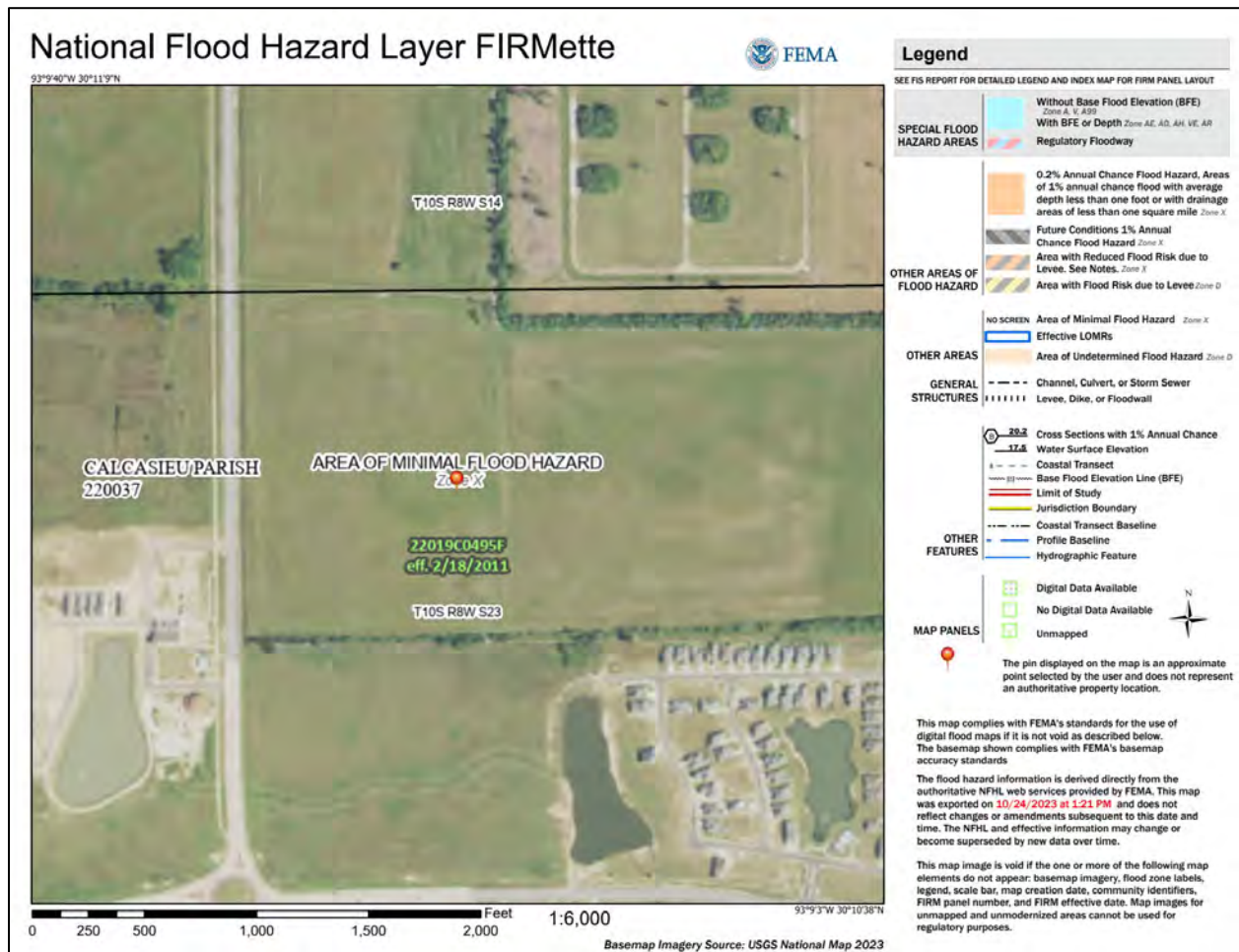


Figure 14- Proposed Project Site Flood Hazards

4.4 Waters of the United States and Wetlands

4.4.1 REGULATORY SETTING

4.4.1.1 Clean Water Act/Rivers and Harbors Act

In 1948, Congress enacted the Federal Water Pollution Control Act which was reorganized and expanded in 1972. In 1977, it became known as the Clean Water Act (CWA). The CWA regulates the discharge of pollutants into water with sections falling under the jurisdiction of the USACE, and the United States Environmental Protection Agency (USEPA).

The USACE regulates the discharge of dredged or fill material into U.S. waters, including wetlands and traditional navigable waterways, following sections 401 and 404 of the CWA. Wetlands, as defined, are identified as those areas inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, or that under normal hydrologic conditions do or would support, a

prevalence of vegetation typically adapted to life in saturated soil conditions. Additionally, the USACE regulation of construction activities in or near any navigable water in the United States is authorized according to sections 9 and 10 of the Rivers and Harbors Act (RHA) of 1899 (33 USC § 401 et seq.).

4.4.1.2 Executive Order 11990, Protection of Wetlands

Executive Order (EO) 11990, Protection of Wetlands, directs federal agencies to minimize wetland destruction, loss, or degradation and enhance wetland values for federally funded projects. FEMA's regulations for adhering to EO 11990 can be found in 44 CFR Part 9, which focuses on Floodplain Management and the Protection of Wetlands. Under 44 CFR § 9.6, Decision Making Process, FEMA is required to engage in the 8-step decision-making process to ensure that proposed activities are consistent with EO 11990 and to evaluate the potential effects of an action on wetlands. The 8-step process includes using minimization measures when a project affecting a wetland is the only practicable alternative. Project-specific minimization measures may include avoidance techniques such as establishing wetland buffer zones to avoid converting or filling wetlands and obtaining and complying with USACE permits and National Pollutant Discharge Elimination System (NPDES) permits. Where impacts to waters of the United States and wetlands are unavoidable, mitigation requirements will be assessed by the jurisdictional federal or state regulatory agency as a condition of permit issuance. The Diocese of Lake Charles is responsible for obtaining any applicable federal or state regulatory agency permits and meeting permit conditions.

4.4.2 EXISTING CONDITIONS

An examination of the National Wetland Inventory (NWI) online mapper, accessed on October 23, 2023, showed that the proposed project area is neither situated within nor does it impact, a designated wetland (See Figure 15. National Wetland Inventory Proposed Project Site Map (NWI) and Figure 16. Wetlands Proposed Project Site).

An analysis was conducted on the 47-acre project site located to the east of Corbina Road (proposed Alternative 3 project area), to assess the presence of jurisdictional wetlands. The wetland delineation report was completed on October 23rd, 2023, following the procedures and methods required in the USACE 1987 Manual for Wetland Delineations and the Atlantic and Gulf Coastal Plain Regional Supplement 2010. This report was submitted to USACE, petitioning for a preliminary isolated wetland determination. According to the findings, approximately 6.1 acres of herbaceous isolated wetlands and 40.9 acres of uplands exist within the proposed Alternative 3 project area boundary. Importantly, the identified wetlands on the tract appear to be isolated, devoid of any direct connectivity or adjacency to a navigable waterway (See Appendix 4. Wetland Delineation). On September 23, 2024 the USACE replied to the submitted Jurisdictional Determination stating that “the property consists entirely of uplands and features that are not subject to Corps' jurisdiction” and “A Department of the Army permit under Section 404 of the Clean Water Act will not be required prior to the deposition or redistribution of dredged or fill material on this site Unavoidable impacts to non-jurisdictional wetlands will be assessed and mitigation prescribed by the resource agency determined to have jurisdiction over non-jurisdictional wetlands. The NWI is not used by USACE or LDNR in the delineation of wetlands as it uses different classification systems and wetland definitions, and accuracy has not been verified.

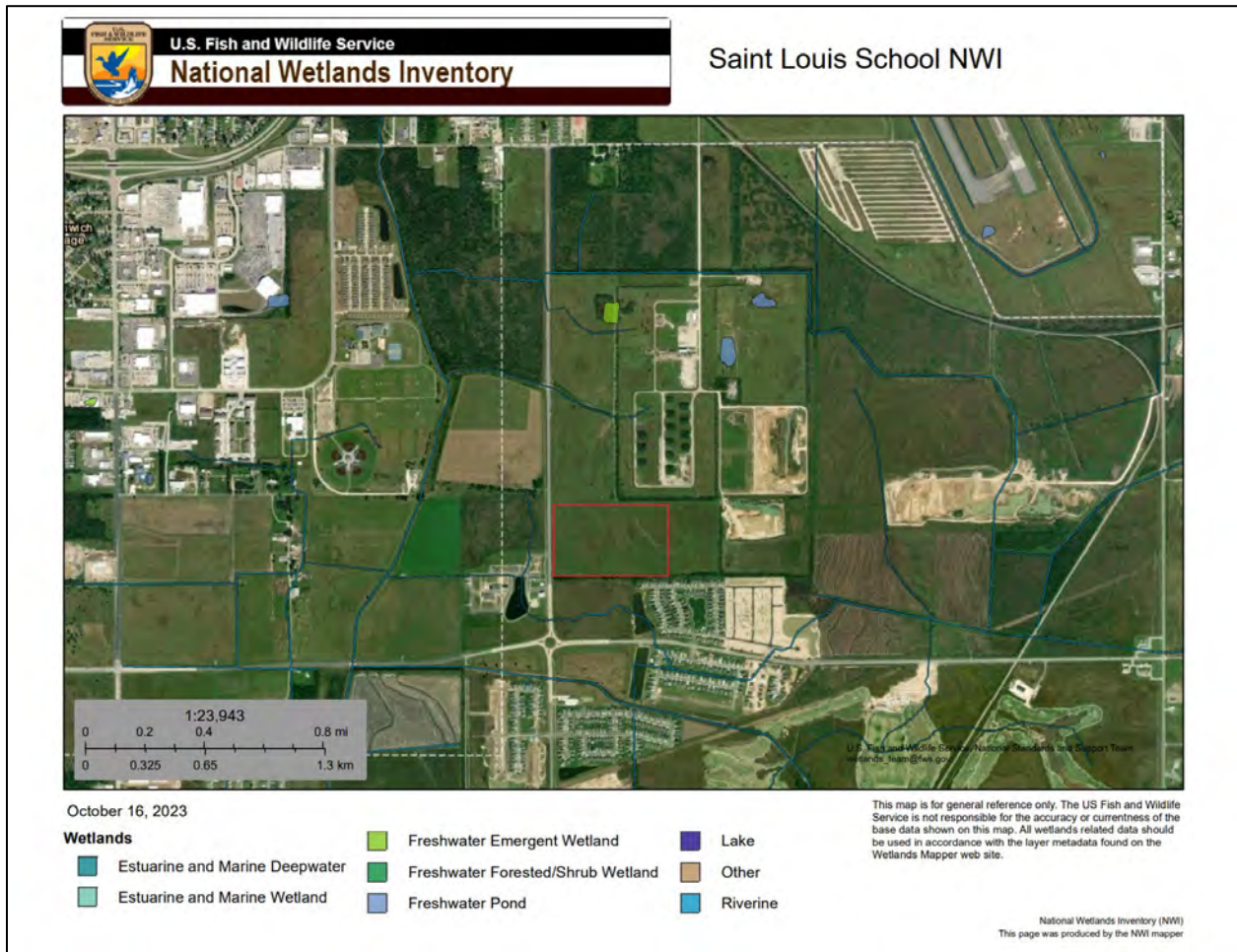


Figure 15 - National Wetland Inventory Proposed Site Map (NWI)

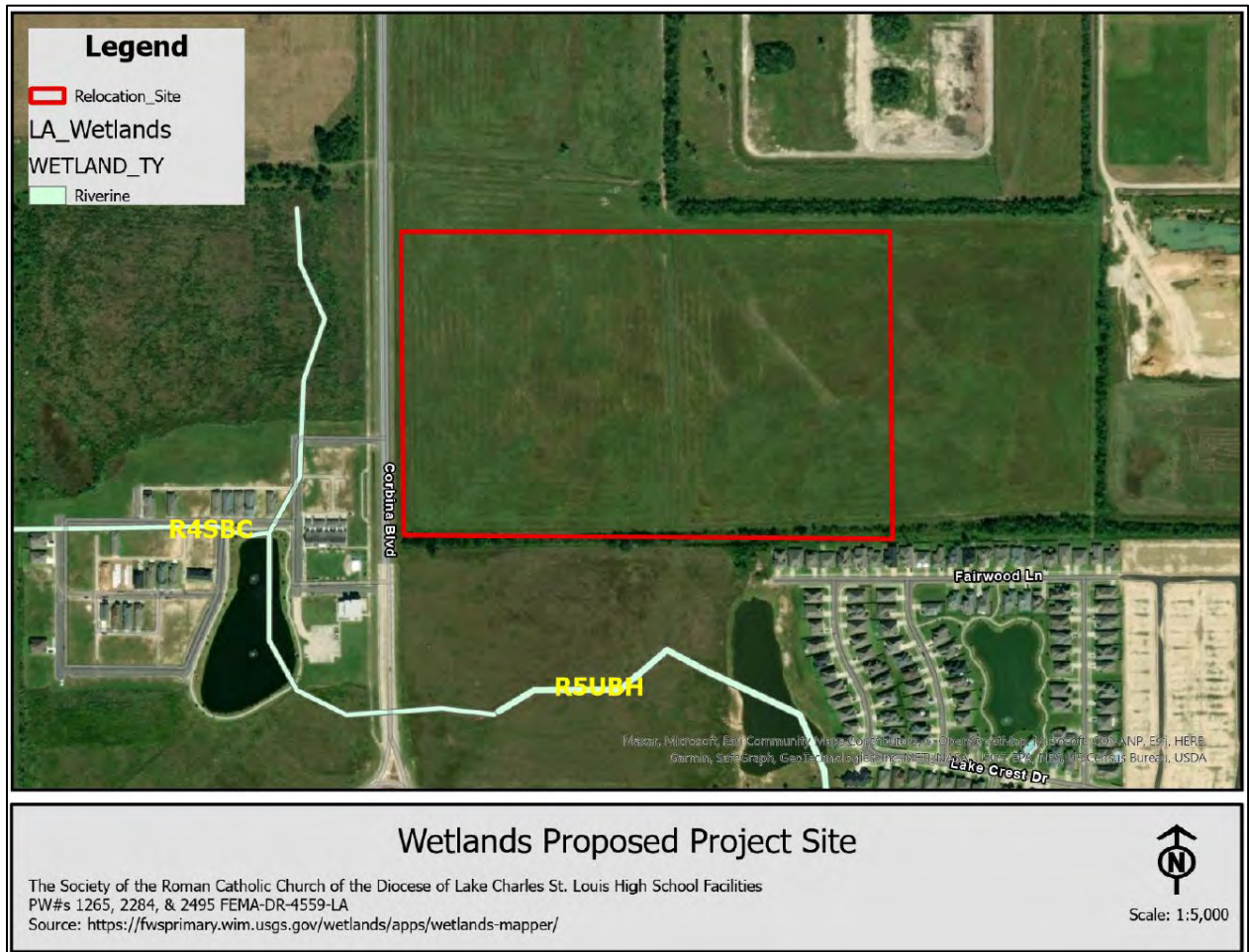


Figure 16 - Wetlands Proposed Project Site

4.4.3 ENVIRONMENTAL CONSEQUENCES

Alternative 1 - No Action: St. Louis Catholic High School Lake Charles, Louisiana Will Remain in its Original Location.

The "No Action" alternative would result in no impact on wetlands or other waters of the United States, and, consequently, would not require permits under Section 404 of the CWA or Section 10 of the RHA.

Alternative 2 – Relocation and construction of a new campus on an alternate site (west of Corbina Blvd.) for St. Louis Catholic High School in Lake Charles, Louisiana

This alternative falls outside the scope of requiring permits under Section 404 of the CWA or Section 10 of the RHA. Additionally Alternative 2 will not impact any wetlands or water bodies within the United States, as the designated project site of this alternative is no longer under consideration due to the purchase of the proposed Alternative 3 project area by the Diocese of Lake Charles.

Alternative 3 - Relocation and construction of a new campus for St. Louis Catholic High School in Lake Charles, Louisiana (Proposed Action)

This alternative would have minor, long-term effects on wetlands and waters of the United States. These impacts include an unavoidable loss of wetlands where construction of permanent buildings, roads, parking lots, and sports field infrastructure will occur. Wetland loss is estimated to be approximately 6.1 acres of isolated wetlands located in the interior of the proposed Alternative 3 project boundary. In compliance with Executive Order 11990, due to the unavoidable impacts and loss of wetlands, compensatory wetland mitigation is required. Compensatory mitigation must be completed prior to, or concurrent with, wetland conversion activities. A minimum ratio of 1 to 1 (acreage) is required. For the wetland impacts associated with this project there is a loss of 6 acres; therefore, 6 acres of wetland mitigation credits must be purchased at an approved mitigation bank. Proof of purchase of mitigation bank credits must be provided to FEMA and GOHSEP. Documentation will be requested at project close out. All credits must be purchased and support wetlands in the State of Louisiana.

4.5 Water Quality and Resources

4.5.1 REGULATORY SETTING

4.5.1.1 Section 401 of the Clean Water Act

Section 401 of the CWA requires state certification of all federal licenses and permits in which there is a “discharge of fill material into navigable waters.” The certification process is used to determine whether an activity, as described in the federal license or permit, would impact established site-specific water quality standards. A water quality certification from the issuing state, the Louisiana Department of Environmental Quality (LDEQ) in this case, is required before the issuance of the relevant federal license or permit. The most common federal license or permit requiring certification is the USACE CWA Section 404 permit.

4.5.1.2 Section 402 of the Clean Water Act

The NPDES program was created by Section 402 of the CWA. This program authorizes the USEPA to issue permits for the point source discharge of pollutants into the waters of the United States. Through a 2004 Memorandum of Agreement (MOA), the USEPA delegated its permit program for the State of Louisiana to the Louisiana Department of Environmental Quality (LDEQ). Having assumed NPDES responsibilities, LDEQ directly issues NPDES permits and has primary enforcement responsibility for facilities located within Louisiana, with certain exceptions such as Tribal Lands. The Louisiana Pollutant Discharge Elimination System (LPDES) requires permits for the discharge of pollutants, including wastewater and stormwater, from any point source into the waters of the state. Per the CWA, the term “point source” is defined as “any discernible, confined, and discrete conveyance such as a pipe or a ditch”. All point source discharges of pollutants to waters in the State of Louisiana are subject to an LPDES permit issued by LDEQ. Additionally, LDEQ requires a Stormwater Pollution Prevention Plan (SWPPP) for land disturbing activities greater than one acre. For land disturbing activities greater than five acres, LDEQ requires a SWPPP, a Notice of Intent, and a Notice of Completion.

4.5.1.3 Safe Drinking Water Act

The Safe Drinking Water Act (SDWA) was passed in 1974 and has been amended twice, most recently in 1996. The SDWA focuses on both above- and below-ground waters designated for public drinking use, both actual and potential, including rivers, reservoirs, lakes, springs, and groundwater wells. It also establishes health-based national standards and testing regimes to protect the public from naturally occurring and human-generated contaminants in drinking water (40 CFR Parts 141-143). Although the SDWA originally focused on treatment as the primary method for providing safe drinking water, the 1996 amendments recognized that other factors such as protecting water sources, providing funds for water system improvements, and disseminating information to the public, are also important.

Oversight of SDWA rules is usually conducted by states under their drinking water programs if a state's standards are at least as stringent as those of the USEPA. The Louisiana Department of Health and Hospitals received primacy to administer the SDWA in Louisiana in 1977, except for the Ground Water Rule and the Revised Total Coliform Rule, which are still overseen by the USEPA (Louisiana Department of Health and Hospitals 2013, USEPA 2004).

The Sole Source Aquifer (SSA) program is established under Section 1424(e) of the SDWA (Public Law 93-523). The SDWA authorizes USEPA to designate an aquifer for special protection under the SSA program if the aquifer is the sole or principal drinking water resource for an area and if its contamination would create a significant hazard to public health. The definition of a designated SSA is one supplying 50 percent or more of the drinking water for a particular area. No commitment for federal financial assistance may proceed for any project that USEPA determines may contaminate a sole source aquifer such that it creates a significant hazard to public health.

4.5.2 EXISTING CONDITIONS

Currently, the proposed Alternative 3 project area is a former agricultural pasture bordered by a highway and drainage ditches, containing a series of small drainage swales to promote drainage to improve hay production and cattle grazing. A wetland delineation determined that approximately 6.1 acres of isolated wetlands also occur within the proposed Alternative 3 project area.

Water resources in the project area include both groundwater and surface water. Groundwater within the project area is contained within the Chicot aquifer system and based on the response letter received by the Sole Source Aquifer Program on December 12, 2023, it was determined that the project, as proposed, should not harm the quality of the groundwater underlying the project site (See Appendix 5. EPA Sole Source Aquifer Program Response Letter). The Chicot aquifer system, which is a designated sole source aquifer (SSA), extends through the southern two-thirds of Calcasieu Parish. Precipitation is restricted from infiltration into the groundwater system by a surficial confining layer of clay.

4.5.3 ENVIRONMENTAL CONSEQUENCES

Alternative 1 - "No Action" St. Louis Catholic High School Lake Charles, Louisiana will remain in its original site.

This alternative would have no new direct impacts on water quality and resources.

Alternative 2 – Relocation and construction of a new campus on an alternate site (west of Corbina Blvd.) for St. Louis Catholic High School in Lake Charles, Louisiana.

The proposed Alternative 2 project area was likely a former agricultural pasture bordered by a highway and drainage ditches used for hay production and cattle grazing. Alternative 2 will not impact water quality or resources, because the designated project site of this alternative is no longer under consideration due to the purchase of the proposed Alternative 3 project area by the Diocese of Lake Charles. As the Chicot aquifer system is not recharged through precipitation, no impacts on the quality of groundwater would occur due to the actions proposed in Alternative 2.

Alternative 3 - Relocation and construction of a new campus for St. Louis Catholic High School in Lake Charles, Louisiana (Proposed Action)

Impacts on surface water quality through a temporary increase in suspended solids through stormwater runoff during and after construction could occur. Construction activities could cause surface soil erosion and a short-term localized reduction in water quality caused by increased turbidity via stormwater runoff. To minimize indirect impacts, such as erosion, sedimentation, dust, and other construction-related disturbances in the vicinity of the site, the construction contractors should implement Best Management Practices (BMPs) under the LDEQ stormwater discharge regulations specified under Sections 401 and 402 of the CWA. This should include the daily incorporation of measures such as silt screens, barriers (e.g., hay bales), berms/dikes, and appropriate fencing strategically placed as necessary. Fencing will be employed to demarcate staging areas for the storage of construction equipment and supplies, as well as for carrying out maintenance and repair operations.

Permanent conversion of existing pastureland to newly constructed buildings, sports fields, concrete roadways, and parking lots may require NPDES and SWPPPs. The Diocese of Lake Charles is required to obtain and comply with the conditions of any water quality certifications and NPDES permits that may be required under CWA Sections 401 and 402. Projects that obtain and comply with the required NPDES permits and SWPPPs will not result in significant impacts to water resources or quality over the long term. Alternative 3 would have negligible, short-term, temporary, impacts and negligible long-term impacts on water resources and quality.

As the Chicot aquifer system is not recharged through precipitation, no impacts on the quality of groundwater would occur due to the actions proposed in Alternative 3.

4.6 Biological Resources

4.6.1 REGULATORY SETTING

4.6.1.1 Endangered Species Act

The Endangered Species Act (ESA) of 1973 (16 USC §§ 1531-1543) prohibits the taking of listed, threatened, or endangered species unless specifically authorized by a permit from the US Fish and Wildlife Service (USFWS) or the National Marine Fisheries Service (NMFS). As defined in 16 USC § 1532 (19), "take" encompasses a range of actions such as harassment, harm, pursuit, hunting,

shooting, wounding, killing, trapping, capturing, or collecting, or any attempt to engage in such conduct. The term "harm," as further defined by the (50 CFR § 17.3), includes significant habitat modification or degradation that results in the death or injury of listed species by significantly disrupting behavioral patterns, such as breeding, feeding, or sheltering.

When a federally funded project either may have the potential to adversely affect a federally listed species or a federal action occurs within or may have the potential to impact designated critical habitat, Section 7(a)(2) of the ESA (87 Stat.884, as amended) requires the lead federal agency to consult with either USFWS or NMFS, depending on which agency has jurisdiction over the federally listed species in question. If the impacts of a proposed federal project are considered negligible to federally listed species, the lead agency may prepare a letter to the agencies with a "May Affect, but Not Likely to Adversely Affect" determination requesting the relevant agency's concurrence. This EA meets the ESA § 7 requirements by identifying any potential impacts and ascertaining the risks of the proposed action and alternatives to known federally listed species and their critical habitat and provides a means for consultation with the agencies. The EA also compiles all correspondence and agency coordination to date.

4.6.1.2 Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) of 1918 (16 USC § 703-712) affirms the United States' commitment to safeguarding migratory birds and their habitats, through various international treaties and conventions (with Canada, Japan, Mexico, and the former Soviet Union) for the protection of migratory bird resources. Unless otherwise permitted by regulation, the MBTA prohibits pursuing; hunting; taking; capturing; killing; attempting to take, capture, or kill; possessing; offering for sale; selling; offering to purchase; purchasing; delivering for shipment; shipping; causing to be shipped; delivering for transportation; transporting; causing to be transported; carrying or causing to be carried by any means whatever; receiving for shipment, transportation, or carriage; or exporting; at any time or in any manner, any birds categorized as "migratory birds" under the statute and included on the list of protected bird species (General Provisions; Revised List of Migratory Birds 2013). Furthermore, the MBTA provides equal protection to live and dead birds, any nests, eggs, and bird parts, including feathers. Executive Order (E.O.) 13186, titled "Responsibilities of Federal Agencies to Protect Migratory Birds," reinforces the protection of migratory birds and their habitats by mandating specific actions that enforce the MBTA. The Mississippi River Flyway, which runs through Louisiana, hosts the world's largest bird migration and is used by approximately 70% of migratory waterfowl in the United States. The USFWS enforces the provisions of this Act.

4.6.1.3 Bald and Golden Eagle Protection Act

Although recovered and no longer listed under the ESA as of August 8, 2007, bald eagles are still protected under the Bald and Golden Eagle Protection Act (BGEPA) (16 U.S.C. 668 et seq.). The USFWS developed the National Bald Eagle Management (NBEM) Guidelines to provide landowners, land managers, and others with information and recommendations to minimize potential project impacts on bald eagles, particularly where such impacts may constitute "disturbance," which is prohibited by the BGEPA. Those guidelines recommend: (1) maintaining a specified distance between the activity and the nest (buffer area); (2) maintaining natural areas (preferably forested) between the activity and nest trees (landscape buffers); and (3) avoiding certain activities during the breeding season. If the

Action may disturb bald or golden eagles, additional coordination with the USFWS under the BGEPA is recommended.

4.6.1.4 Fish and Wildlife Coordination Act

The Fish and Wildlife Coordination Act (FWCA) of 1934 (48 Stat. 401, as amended; 16 USC 661-666c), assures that fish and wildlife resources receive equal consideration with other values during the planning of water resources development projects. The Act was passed because the goals of water-related projects (e.g., flood control, irrigation, navigation, hydroelectric power) may conflict with conserving fish and wildlife resources.

The FWCA requires federal agencies to consult with the USFWS whenever they plan to conduct, approve, or fund an undertaking involving the impoundment, diversion, deepening, control, or modification of a stream or body of water. None of the proposed Alternatives involves any of the above undertakings; therefore, FWCA does not apply to any of the actions proposed in this EA.

4.6.1.5 Magnuson-Stevens Fishery Conservation and Management Act

The Magnuson-Stevens Fishery Conservation and Management Act (MSA) is the primary law governing marine fisheries management in United States federal waters. The MSA created eight regional fishery management councils to manage fisheries and promote conservation. The MSA focuses on rebuilding overfished fisheries and protecting EFH. Managed species vary regionally and are specified in Fisheries Management Plans (FMPs) prepared by regional Fisheries Management Councils. EFH is designated in individual FMPs to manage habitats that are important to maintain fish stocks. EFH includes water and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity. The MSA requires all federal agencies to consult with NMFS on proposed projects authorized, funded, or undertaken by that agency that may adversely affect EFH. Guidelines under Section 305(b) of the MSA direct the NMFS to use a coordinated process to evaluate projects that may affect EFH, in conjunction with the required Section 7 consultation process under the ESA. The proposed Alternatives would not have any impact on designated EFH.

4.6.2 EXISTING CONDITIONS

4.6.2.1 Habitats

The wetland delineation report dated October 23, 2023, states that the proposed Alternative 3 project area is undeveloped pastureland that was historically used for agricultural purposes (hay production and cattle grazing). The dominant grass vegetation consists of yellow bluestem (*Bothriochloa ischaemum*) and Bahia grass (*Paspalum notatum*) with the presence of St. Augustine grass (*Stenotaphrum secundatum*), plume grass (*Saccharum giganteum*), and breaded beggartick (*Bidens aristosa*). Within the observed wetland areas, lamp rush (*Juncus effusus*) was observed. Two tree/shrub species were also determined to be present within the surveyed area: Chinese tallow (*Triadica sebifera*) and Southern bayberry (*Morella cerifera*).

4.6.2.2 Protected Species

FEMA initiated informal consultation with the USFWS per Section 7 of the ESA; the MBTA; EO 13186; and the FWCA. That consultation described FEMA's assessment of potential project impacts. According to the USFWS Information, Planning, and Conservation (IPaC) online system, as of October 13, 2023, the proposed Alternative 2 and 3 project areas could potentially have an occurrence of 4 threatened, endangered, or candidate species. Among these species, the red-cockaded woodpecker (*Picoides borealis*) is federally listed as endangered, while the whooping crane (*Grus americana*) holds a status of experimental population, non-essential. Additionally, the alligator snapping turtle (*Macrochelys temminckii*) is currently proposed to be listed as a threatened species, and the Monarch butterfly (*Danaus plexippus*) is categorized as a candidate for listing (See Appendix 6. U.S. Fish & Wildlife Service Consultation Letter, Species List Louisiana Ecological Services Field Office, and NE Consistency Letter Louisiana Endangered Species Act).

No critical habitat has been identified for any listed species within the proposed Alternative 2 and 3 project areas.

4.6.3 ENVIRONMENTAL CONSEQUENCES

Alternative 1 – No Action: St. Louis Catholic High School Lake Charles, Louisiana Will Remain in its Original Location.

The "No Action" alternative involves no planned activities, and as a result, it would not have any impact on any biological resources.

Alternative 2 – Relocation and construction of a new campus on an alternate site (west of Corbina Blvd.) for St. Louis Catholic High School in Lake Charles, Louisiana

The proposed Alternative 2 project area consists of a clear, often mowed, agricultural (formerly used for cattle grazing), grassy pasture bordered by a highway, and treed fencerows near developed residential subdivisions. Pine or pine/hardwood forest, coastal or inland marshes, flooded agricultural fields, fresh-water riverine habitat, or milkweed are not present on or adjacent to the proposed project area. Based on project area conditions, habitat requirements for protected species identified by USFWS's IPaC documentation letter for the Alternative 3 proposed project area, and utilization of USFWS's Louisiana Determination Key (DKey) for the red-cockaded woodpecker for the Alternative 3 proposed project area, no suitable habitat to support the presence of any protected, listed, proposed, or candidate species exists. FEMA has determined that the Alternative 2 proposed project would not affect any federal trust resources that are safeguarded by the ESA.

Construction of Alternative 2 would not involve the removal of mature trees that could support foraging or nesting birds of special concern protected by the MBTA.

FEMA is not currently aware of any existing bald eagle nests or potential nest trees that may be present in the fencerows that border the proposed Alternative 2 project area. However, if the applicant or their construction contractors observe nesting bald eagles in trees surrounding the project area, they will inform FEMA who will contact the USFWS for additional guidance if the National Bald Eagle Management Guidelines cannot be achieved.

Alternative 2 is not a water resources development project nor is the proposed project area located within or near any designated EFH; therefore, no consultation for FWCA or MSA is required.

Alternative 3 – Relocation and construction of a new campus for St. Louis Catholic High School Lake Charles, Louisiana (Proposed Action)

The proposed Alternative 3 project area consists of a clear, often mowed, agricultural (formerly used for cattle grazing), grassy lot bordered by a highway, and treed fencerows near developed residential subdivisions. Pine or pine/hardwood forest, coastal or inland marshes, flooded agricultural fields, fresh-water riverine habitat, or milkweed are not present on or adjacent to the proposed project area. Based on project area conditions, habitat requirements for protected species identified by USFWS's IPaC documentation letter, and utilization of USFWS's Louisiana Determination Key (DKey) for the red-cockaded woodpecker, no suitable habitat to support the presence of any protected, listed, proposed, or candidate species exists. FEMA has determined that the Alternative 3 proposed project would not affect any federal trust resources that are safeguarded by the ESA. Further, in a Consistency Letter dated October 13, 2023 (See Appendix 6. U.S. Fish & Wildlife Service Consultation Letter, Species List Louisiana Ecological Services Field Office, and NE Consistency Letter Louisiana Endangered Species Act), USFWS concluded that FEMA has met its consultation requirements for red-cockaded woodpecker and that no further ESA consultation for that species is required.

4.7 Cultural Resources

4.7.1 REGULATORY

The consideration of impacts on historic and cultural resources is mandated under § 101(b)(4) of NEPA as implemented by 40 C.F.R. Parts 1501-1508. Section 106 of the National Historic Preservation Act (NHPA) requires federal agencies to consider their effects on historic properties (i.e., historic, and cultural resources, including American Indian Cultural Sites) and allow the Advisory Council on Historic Preservation (ACHP) an opportunity to comment. Additionally, it is the policy of the federal government to consult with Indian Tribal Governments on a Government-to-Government basis as required in E.O. 13175 (U.S. President 2000). FEMA has chosen to address potential impacts on historic properties through the "Section 106 consultation process" of NHPA as implemented through 36 C.F.R. Part 800.

FEMA, the Louisiana State Historic Preservation Officer (SHPO), the Louisiana Governor's Office of Homeland Security and Emergency Preparedness (LA 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, have executed a Statewide Programmatic Agreement dated March 11, 2024 (2024 Statewide PA).

The "Section 106 process" outlined in the Statewide Agreement requires the identification of historic properties that may be affected by the proposed action or alternatives within the project's Area of Potential Effects (APE). Historic properties, defined in § 101(a)(1)(A) of NHPA, include districts, sites (archaeological and religious/cultural), buildings, structures, and objects that are listed in or determined eligible for listing in the National Register of Historic Places (NRHP). Historic properties

are identified by qualified agency representatives in consultation with interested parties. Below is a consideration of various alternatives and their effects on historic properties.

4.7.2 EXISTING CONDITIONS

In September 2023, FEMA initiated a Section 106 consultation to evaluate historical resources within the St. Louis High School Main Building, the Landry Memorial Gymnasium "Old Gym," and the Krajicek Gymnasium "New Gym," aiming to assess potential impacts stemming from FEMA-funded activities. Their extensive research, spanning from June 2022 to August 31, 2023, included a thorough examination of the NRHP database, the Louisiana Division of Archaeology (LDOA) website including the Louisiana Cultural Resources Map, the McNeese State University online database, the Library of Congress online database, and historical aerial photography.

FEMA's investigation concluded that there were no archaeological sites within a 1,000-foot radius of the project site. However, it confirmed that the buildings were situated within an eligible National Historic District of considerable significance, as outlined by 36 CFR 800.16(1). The Choctaw Nation of Oklahoma has emphasized the historical significance of Calcasieu Parish, LA, expressing particular concern about the archaeological implications. In their response letter dated October 31, 2023, the Choctaw Nation has raised significant apprehensions regarding the proposed plans for the demolition and subsequent construction of a new school. Their primary concern stems from the heightened likelihood of disturbing human remains during these activities, prompting a call for careful consideration and preservation of the area's historical integrity. (See Appendix 7. Section 106 Review Consultation, Continuing Consultation, and Response Letter). It is crucial to note that the determination of adverse effects was made regarding the original school site, and the analysis of the relocation site was centered on the initially discarded location.

On September 21, 2023, the State Historic Preservation Office evaluated Alternative 2, which was the previously proposed relocation site for St. Louis Catholic High School in Lake Charles, Louisiana. Following this assessment, a continuing consultation was held on October 20, 2023, during which Alternative 3 was thoroughly evaluated.

Both evaluations confirmed the absence of any known archaeological sites within a 0.5-mile radius. A separate assessment of the U.S. National Park Service's National Register of Historic Places (NRHP) on the October 2023 database likewise determined that there are no recorded archaeological sites within the designated proposed site location (See Appendix 7. Section 106 Review Consultation and Continuing Consultation, and Response Letter).

4.7.3 ENVIRONMENTAL CONSEQUENCES

Alternative 1 – No Action: St. Louis Catholic High School Lake Charles, Louisiana Will Remain in its Original Location.

This alternative does not include any FEMA undertaking; therefore, FEMA has no further responsibilities under § 106 of the NHPA.

Alternative 2 – Relocation and construction of a new campus on an alternate site (west of Corbina Blvd.) for St. Louis Catholic High School in Lake Charles, Louisiana

FEMA's assessment confirmed that none of the former site locations falls within 0.5 miles of any archaeological sites. However, given the historical placement of the Louisiana Baptist Orphanage on the site from 1899 to 1925, there exists a distinct possibility of rediscovering unmarked graves during the proposed activities. Should the alternative in question be selected, there have been monitoring recommendations proposed specifically for any demolition activities. These recommendations aim to ensure diligent oversight and vigilance during the demolition phase, acknowledging the potential presence of historically significant remnants such as unmarked graves and highlighting the necessity for meticulous handling and preservation of any discovered artifacts or remains.

Alternative 3 – Relocation and construction of a new campus for St. Louis Catholic High School in Lake Charles, Louisiana (Proposed Action)

In October 2023, a review of the NRHP database indicated the absence of recorded archaeological sites within the designated proposed site location for Alternative 3. Furthermore, as per the State Historic Preservation Office's assessment in a letter dated September 21, 2023, concerning Alternative 2 as the former relocation site for St. Louis Catholic High School in Lake Charles, Louisiana, no known archaeological sites were found within a 0.5-mile radius of the mentioned location and covers the area of the proposed site for Alternative 3.

The supplemental SHPO consultation letter dated Oct 20, 2023, stated that "The location chosen for the new school is former farmland with Corbina Road on the west, the McNeese State University Farm to the southwest, and E. McNeese Street and a few nascent neighborhoods to the south and southeast. FEMA has determined that none of the proposed new campus work is within 0.5 miles of any archaeological sites, nor are there any recorded archaeological sites within the new property parcel (Figure 10)." This was based on review of the NRHP database, the Louisiana Division of Archaeology (LDOA), Louisiana Cultural Resources Map (LDOA Website), and historic aerial photography. Map research reviewed included the following reference materials: U.S. Geological Survey (USGS) Quadrangle Maps, Sanborn Maps, and other available historic maps. Additional background information consulted included: the Louisiana Cultural Resources Management (CRM) Bibliography (LDOA Website), Louisiana Department of Archaeology (LDOA) Site Forms, and pertinent site and survey reports regarding previous investigations within 1,000 feet of the project APE. There was no independent survey performed at this location.

The Calcasieu Parish lies in an area of historic interest established by the Choctaw Nation of Oklahoma. In their response letter dated October 31, 2023, the Choctaw Nation emphasized their concerns regarding the archaeological aspects of the project, specifically citing the heightened likelihood of unearthing human remains. They firmly established the necessity for the presence of a Secretary of the Interior (SOI) qualified archaeologist on-site to diligently oversee and monitor all activities associated with the proposed project. This requirement underscores their commitment to ensuring the preservation and respectful handling of any historical artifacts or human remains that may be encountered during the demolition and construction processes (See Appendix 7. Section 106 Review Consultation, Continuing Consultation, and Response Letter).

4.8 Socioeconomics Issues

4.8.1 ENVIRONMENTAL JUSTICE

Executive Order (E.O.) 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, was signed on 11 February 1994 (U.S. President 1994). This E.O. 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 their programs, policies, and activities on minority and/or low-income populations. Minorities are defined as anyone who identifies as black or African American, American Indian (Native American), Alaska Native, Asian American, Native Hawaiian or Pacific Islander, Hispanic, or multiracial. Low-income populations are those with incomes at or below the annual statistical federal poverty thresholds determined by the U.S. Census Bureau.

4.8.2 EXISTING CONDITIONS

Socioeconomic and demographic data for the project area were reviewed to determine if the proposed action would have a disproportionate adverse impact on low-income persons. Information obtained from the U.S. Census Bureau was compiled and extrapolated by the U.S. Environmental Protection Agency (USEPA). The USEPA's Environmental Justice Screening and Mapping tool (EJScreen, USEPA 2023) was used to investigate the presence of readily identifiable low-income or minority populations within a 1-mile buffer of the proposed project area and indicates that the population within is composed of 56% Black, 25% White, 11% Hispanic, 4% Two or more races, 3% other races and 2% Asian. For the 5-year dataset 2017-2021, the U.S. Census Bureau's estimated median household income over the preceding 12 months for the Calcasieu Parish at \$31,044. This project has been determined to have no potential to have disproportionately high and adverse human health or environmental effects on minority or low-income populations according to FEMA's EO 12898 Guidance or input from EHP Leadership. FEMA has no further EO 12898 responsibilities regarding these activities.

4.8.3 ENVIRONMENTAL CONSEQUENCES

Alternative 1 – No Action: St. Louis Catholic High School Lake Charles, Louisiana Will Remain in its Original Location.

Under the "No Action" alternative, the existing damage will not be addressed, necessary repairs will not be undertaken, and relocation will not be considered. The school will continue to operate in its current location without any improvements or efforts to relocate. This will inevitably lead to students being deprived of adequate facilities to meet the demands of the community, thereby adversely impacting the minority and/or low-income population.

Alternative 2 – Relocation and construction of a new campus on an alternate site (west of Corbina Blvd.) for St. Louis Catholic High School in Lake Charles, Louisiana

The alternative of relocating a school to a smaller location can have several adverse consequences, especially for vulnerable communities such as minorities and those with limited financial means. The constrained space can severely limit the school's capacity, potentially creating barriers to educational

access for marginalized groups. With a diminished number of classrooms, limited access to libraries, fewer laboratory facilities, and restricted sports amenities, students hailing from disadvantaged backgrounds are disproportionately deprived of the essential tools necessary for their academic advancement and overall personal growth. Furthermore, the potential threat of flooding in the new area introduces an added layer of complexity. The risk of flooding could disrupt the educational process, resulting in temporary or prolonged closures, thereby significantly interrupting students' academic progress and continuity. Consequently, this poses a serious challenge to the stability and effectiveness of the learning environment, potentially exacerbating pre-existing educational disparities for those already facing socio-economic hardships.

Alternative 3 – Relocation and construction of a new campus for St. Louis Catholic High School in Lake Charles, Louisiana (Proposed Action)

The Proposed Action Alternative of relocating and the construction of a new school can have a range of impacts on minority and low-income populations, both positive and negative. It can improve access to education for minority and low-income populations by providing a modern and well-equipped learning environment.

This can significantly impact the quality of education and provide students from minority and low-income populations with an enhanced learning environment, potentially leading to improved academic performance and opportunities for future success. However, there is a potential risk of displacement and gentrification associated with constructing a new school, particularly if it is part of broader urban development initiatives. This can lead to the displacement of existing residents, including minority and low-income populations, due to rising property values and living costs, which may negatively impact their access to affordable housing and community resources. FEMA will provide an opportunity for public comments. The public comment period will be 30 days.

4.9 Air Quality

4.9.1 REGULATORY

The Clean Air Act (CAA) of 1963, as amended, provides federal protection aimed at safeguarding air quality by controlling the sources of air pollution and setting emissions standards for specific pollutants. Within the CAA framework, states adopt ambient air quality standards to protect the public from potentially harmful amounts of pollutants. Under the CAA, the USEPA establishes primary and secondary air quality standards. Primary air quality standards protect public health, including the health of "sensitive populations, such as people with asthma, children, and older adults." Secondary air quality standards protect the public welfare by promoting ecosystem health and preventing decreased visibility and harm to crops and buildings. The USEPA has instituted National Ambient Air Quality Standards (NAAQS) for the following six criteria pollutants: ozone (O₃), particulate matter (PM_{2.5}, PM₁₀), nitrogen dioxide (NO₂), carbon monoxide (CO), sulfur dioxide (SO₂), and lead (Pb). The USEPA designates areas as either NAAQS attainment or nonattainment areas, with nonattainment areas failing to meet air quality standards and attainment areas complying with ambient air quality requirements.

4.9.2 EXISTING CONDITIONS

As of the search conducted on October 30, 2023, the USEPA Green Book on Nonattainment Areas for Criteria Pollutants indicates that Lake Charles is in attainment status for all criteria pollutants, with a 'Marginal' classification. This classification signifies that the area has a relatively low level of air pollution, with pollutant concentrations close to, but still within, acceptable air quality standards (Appendix 8. Louisiana Nonattainment Maintenance Status USEPA).

4.9.3 ENVIRONMENTAL CONSEQUENCES

Alternative 1 – No Action: St. Louis Catholic High School Lake Charles, Louisiana Will Remain in its Original Location.

Under the “No Action” alternative, both short-term and long-term air quality impacts would be negligible as no construction activities would take place.

Alternative 2 – Relocation and construction of a new campus on an alternate site (west of Corbina Blvd.) for St. Louis Catholic High School in Lake Charles, Louisiana

Under this Action Alternative, there may be short-term air quality impacts associated with excavation and construction activities. These impacts primarily relate to the temporary increase in particulate emissions caused by the creation of fugitive dust during the excavation and construction phases of the project. Emission sources within the project area would include internal combustion engines and heavy construction equipment. It's important to note that any effects on air quality would be localized and short-lived.

To mitigate potential short-term air quality impacts resulting from construction-related activities, the contractor should implement Best Management Practices (BMPs) to reduce fugitive dust generation and diesel emissions. The contractor's responsibilities would include periodic watering of construction areas as needed to minimize particulate matter and dust. To curtail emissions of criteria pollutants, the operation times of fuel-burning equipment would be minimized, and engines would be subject to regular maintenance. Emissions from fuel-burning internal combustion engines, such as those found in heavy equipment and earthmoving machinery, could lead to temporary increases in levels of certain criteria pollutants, including CO, NO₂, O₃, and PM₁₀, as well as non-criteria pollutants like volatile organic compounds. Long-term emissions, such as those produced by small engines used for lawn maintenance and offsite power generation, are anticipated to be like emissions associated with the previously existing multi-purpose structure and functions. These impacts are expected to be minor and localized.

Alternative 3 – Relocation and construction of a new campus for St. Louis Catholic High School in Lake Charles, Louisiana (Proposed Action)

The Proposed Action Alternative entails potential short-term air quality impacts arising from excavation and construction activities. These impacts primarily stem from the temporary escalation of particulate emissions due to fugitive dust generated during the project's excavation and construction phases. Emission sources within the project area will encompass internal combustion engines and heavy

construction equipment. It's worth emphasizing that any effects on air quality will be limited in scope and short-lived.

To address potential short-term air quality impacts resulting from construction-related activities, the contractor should implement BMPs aimed at reducing fugitive dust generation and diesel emissions. The contractor's responsibilities will include periodic watering of construction areas as needed to minimize the release of particulate matter and dust. To mitigate emissions of criteria pollutants, fuel-burning equipment's operating times will be minimized, and engines will be subject to regular maintenance. Emissions from fuel-burning internal combustion engines, such as those present in heavy equipment and earthmoving machinery, could lead to transient increases in levels of certain criteria pollutants, including (CO), (NO₂), (O₃), and (PM₁₀), as well as non-criteria pollutants like volatile organic compounds. In contrast, long-term emissions, such as those produced by small engines used for lawn maintenance and offsite power generation, are anticipated to be on par with emissions associated with the previously existing multi-purpose structure and its functions. It's important to note that these impacts are expected to be minor and confined to localized areas.

4.10 Noise

4.10.1 REGULATORY

Noise is commonly defined as sound that is considered unwanted or disruptive. It is most frequently measured in decibels (dB) using the A-weighted scale, which closely aligns with the range of sounds audible to the human ear. The Day-Night Average Sound Level (DNL) serves as an averaged sound measurement and is recognized by federal agencies as a standard for assessing sound impacts and establishing guidelines for compatible land uses.

Sound is subject to federal regulation under the Noise Control Act of 1972, which assigns the USEPA the responsibility of developing guidelines for acceptable ambient noise levels. According to USEPA guidelines, as well as those of several other federal agencies, outdoor sound levels exceeding 55 dB DNL are typically deemed 'unacceptable' for noise-sensitive land uses, such as residential areas, schools, and hospitals (USEPA, 1974). It is worth noting that the Noise Control Act assigns the implementation of noise standards to federal agencies operating noise-producing facilities or equipment, and FEMA, by the nature of its mission, lacks specific statutes of noise regulation.

Calcasieu Parish's Code of Ordinances § 18-100, has made unlawful the operation of "any equipment used in construction work within one hundred sixty-five (165) feet of any residential or noise-sensitive area between sunset and sunrise on weekdays and Saturdays, and 9:00 p.m. to 8:00 a.m. on Sundays and holidays, except for emergency work". Exemptions from noise regulations include noises made by individuals with permits and noises arising from temporary activities permitted under specific conditions and limits.

4.10.2 EXISTING CONDITIONS

There are no noise-sensitive receptors, such as hospitals, schools, or churches, in the immediate or adjacent project area; however, there is one church (First Presbyterian Church) and residences located within 0.5 miles to the south of the proposed project site.

4.10.3 ENVIRONMENTAL CONSEQUENCES

Alternative 1 – No Action: St. Louis Catholic High School Lake Charles, Louisiana Will Remain in its Original Location.

Under the “No Action” alternative, there would be no short- or long-term impact on noise levels because no construction would occur.

Alternative 2 – Relocation and construction of a new campus on an alternate site (west of Corbina Blvd.) for St. Louis Catholic High School in Lake Charles, Louisiana

Construction of a new campus for St. Louis Catholic High School would result in a slight increase in noise from construction equipment and vehicular activity. Equipment and machinery utilized on the project site would meet all local, state, and federal noise regulations. Although the proposed action would result in a slight increase in noise during construction, the noise is expected to be minor, localized, and short-term. Normal activities at the new high school campus are unlikely to affect sensitive receptors in the area.

Alternative 3 – Relocation and construction of a new campus for St. Louis Catholic High School in Lake Charles, Louisiana (Proposed Action)

Construction of a new campus for St. Louis Catholic High School would result in a slight increase in noise because of construction equipment and vehicular activity. Equipment and machinery utilized on the project site would meet all local, state, and federal noise regulations. Although the proposed action would result in a slight increase in noise during construction, the noise is expected to be minor, localized, and short-term. Normal activities at the new high school campus are unlikely to affect sensitive receptors in the area.

4.11 Hazardous Materials

4.11.1 REGULATORY

The management of hazardous materials is subject to rigorous oversight under federal and state environmental and transportation laws. These include the Resource Conservation and Recovery Act (RCRA), the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Toxic Substances Control Act of 1976 (TSCA), the Emergency Planning and Community Right-to-Know Act, the Hazardous Materials Transportation Act, and the Louisiana Voluntary Investigation and Remedial Action statute. The primary aim of these regulations is to safeguard human health and the environment by ensuring the appropriate handling (identification, use, storage, treatment, transport, and disposal) of hazardous materials. Some of these laws also entail provisions for the investigation and remediation of sites already contaminated by hazardous substances.

Under the TSCA (15 U.S.C., Ch. 53), the USEPA is empowered to mitigate "unreasonable risk of injury to health or the environment" by overseeing the introduction, manufacture, importation, sale, use, and disposal of specific chemicals. "New Chemicals" refer to substances not listed in the chemical substance inventory compiled and published under TSCA section 8(b). Meanwhile, "Existing Chemicals" encompass those currently included in § 8(b), such as polychlorinated biphenyls (PCBs),

asbestos, radon, lead-based paint, chlorofluorocarbons, dioxin, and hexavalent chromium. TSCA's Subchapter I, "Control of Toxic Substances" (§§ 2601-2629), governs the disposal of PCB products, sets contamination limits for PCBs in the environment, and authorizes the remediation of PCB-contaminated sites. Subchapter II, "Asbestos Hazard Emergency Response" (§§ 2641-2656), empowers the USEPA to impose requirements for asbestos abatement in schools and mandates accreditation for those inspecting asbestos-containing materials. Subchapter IV, "Lead Exposure Reduction" (§§ 2681-2692), mandates the USEPA to identify sources of lead contamination, regulate allowable lead levels in products, and establish state programs to monitor and decrease lead exposure.

The Small Business Liability Relief and Revitalization Act, known as the Brownfield Amendments, clarifies CERCLA liability provisions for potential property owners. By meeting specific provisions of the act, including conducting an adequate inquiry into the property's past uses, landowners can assert the innocent landowner defense, contiguous property exemption, and bona fide prospective purchaser exemption from CERCLA liability. The USEPA has also issued the Draft "all appropriate inquiries" rule (40 CFR § 312.10), which outlines criteria for conducting Environmental Site Assessments on properties under consideration for acquisition. This is relevant to proposed activities that may necessitate land acquisition for establishing new rights-of-way.

4.11.2 EXISTING CONDITIONS

This section examines the probability of past hazardous material releases into the nearby environment, potentially affecting both surface soils and subsurface media, such as soils and groundwater. Furthermore, it assesses the project's capacity to utilize hazardous materials, produce hazardous wastes, and discharge hazardous substances.

In April 2023, the Applicant initiated a Phase I Environmental Site Assessment (ESA) for the project site, conducted under Standard Designation E1527-21 of the American Society of Testing and Materials (ASTM). Phase I ESAs are typically conducted during site acquisitions to assess the site's historical usage and determine the potential for the use or release of hazardous materials from the site. The primary objective of the ESA is to identify, to the extent possible, recognized potential environmental conditions associated with the property. These conditions encompass the presence of any hazardous substances or petroleum products on the property, indicating an existing release, previous release, or a material threat of release of any hazardous substances or petroleum products into structures on the property, or into the ground, groundwater, or surface water of the property.

Before commencing the site reconnaissance, an environmental database search was conducted, including a review of the Louisiana Department of Natural Resources Strategic Online Natural Resources Information System (SONRIS) website to identify any oil and gas wells in the vicinity of the subject property. The site reconnaissance involved inspecting the subject property for potential sources of environmental concern. Following the visual inspection of the subject property, a driving tour was conducted within a 1.0-mile radius to identify additional potential sources of environmental concern that could impact the subject property. At the time of this Phase I ESA, no facilities or structures were identified on or near the subject property that would lead to any significant assumptions about the property's condition. The surrounding land uses primarily consisted of a mix of new and upcoming residential developments and agricultural pastures.

The subject property itself does not host any structures, roads, or other developments. A drainage ditch runs immediately west and adjacent to the subject property, paralleling Corbina Road. The utilities adjacent to the property include fiber optic communications and natural gas distribution. No additional improvements, structures, or roads were observed on the subject property. During the site inspection, no hazardous substances, evidence of solid waste disposal, or storage tanks were identified on the subject property. Based on the findings of the investigations conducted in this Phase I Environmental Site Assessment, there were no recognized environmental conditions identified within the subject property (Appendix 9. Phase I Environmental Site Assessment).

4.11.3 ENVIRONMENTAL CONSEQUENCES

Alternative 1 – No Action: St. Louis Catholic High School Lake Charles, Louisiana Will Remain in its Original Location.

The “No Action” alternative would not disturb any hazardous materials or create any additional hazards to human health.

Alternative 2 – Relocation and construction of a new campus on an alternate site (west of Corbina Blvd.) for St. Louis Catholic High School in Lake Charles, Louisiana

Alternative 2 would not disturb any hazardous materials or pose additional hazards to human health.

Alternative 3 – Relocation and construction of a new campus for St. Louis Catholic High School in Lake Charles, Louisiana (Proposed Action)

The examination of the proposed action reveals the absence of hazardous materials, wastes, or substances, including contaminated soil or groundwater, within the project site. In the event of unexpected encounters with hazardous constituents during construction operations, it is imperative to promptly implement appropriate measures to assess, remedy, and manage the contamination under pertinent federal, state, and local regulations.

Moreover, it is crucial to adhere to best management practices and employ suitable strategies to prevent, minimize, and control the occurrence of hazardous material spills. Any hazardous and non-hazardous waste generated should be disposed of in compliance with the relevant federal, state, and local requirements.

4.12 Public Health and Safety

4.12.1 REGULATORY

Executive Order 13990, of January 20, 2021, directs Federal agencies to immediately review, and take action to address, Federal regulations promulgated and other actions taken during the last 4 years that conflict with national objectives to improve public health and the environment; ensure access to clean air and water; limit exposure to dangerous chemicals and pesticides; hold polluters accountable, including those who disproportionately harm communities of color and low-income communities; reduce greenhouse gas emissions; bolster resilience to the impacts of climate change;

restore and expand our national treasures and monuments; and prioritize both environmental justice and employment.

4.12.2 EXISTING CONDITIONS

The Proposed Project site is conveniently located near key public safety and health facilities. It sits about 2.81 miles from the Cajun Country Fire Department, approximately 3.15 miles from the Calcasieu Parish Sheriff Department, and roughly 2.93 miles from the LSU Wo Moss Medical Center, services provided by Sarwar Mohammed MD. This proximity to vital public safety, law enforcement, and medical services guarantees that emergency response capabilities are well-established to address potential safety and health concerns.

4.12.3 ENVIRONMENTAL CONSEQUENCES

Alternative 1 – No Action: St. Louis Catholic High School Lake Charles, Louisiana Will Remain in its Original Location.

Under the "No Action" alternative, opting not to proceed with the project would lead to damaged facilities not being replaced, potentially resulting in the community being deprived of essential services and causing adverse or disproportionate impacts, particularly among minority or low-income populations.

Alternative 2 – Relocation and construction of a new campus on an alternate site (west of Corbina Blvd.) for St. Louis Catholic High School Lake Charles, Louisiana.

Under this Action Alternative, the Proposed Action is not anticipated to result in disproportionately adverse effects on the human health, environment, or public safety of low-income or minority populations. A site inspection confirmed the absence of hazardous substances on the subject property, and no documented soil or groundwater contamination exists on or adjacent to the site. Consequently, concerns related to vapor intrusion into structures on the property are not expected. The proposed project is expected to provide lasting benefits to the community by offering educational services to all residents.

Alternative 3 – Relocation and construction of a new campus for St. Louis Catholic High School in Lake Charles, Louisiana (Proposed Action)

The Proposed Action is not anticipated to result in disproportionately adverse effects on the human health, environment, or public safety of low-income or minority populations. A site inspection confirmed the absence of hazardous substances on the subject property, and no documented soil or groundwater contamination exists on or adjacent to the site. Consequently, concerns related to vapor intrusion into structures on the property are not expected. The project is expected to provide lasting benefits to the community by offering educational services to all residents.

The Proposed Action will maintain proper safety protocols during construction to prevent accidents or injuries, control dust, and noise for minimal disruption to nearby residents, and adhere to environmental regulations safeguarding air and water quality throughout the construction phase.

Additionally, measures will be taken to secure the construction site, control vehicular traffic to and from the site, and provide clear safety guidelines for workers and visitors.

5.0 Cumulative Impacts

The Council of Environmental Quality (CEQ) regulations state that the cumulative impact of a project represents 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 impacts can result from individually minor but collectively significant actions taking place over a while” (40 C.F.R. § 1508.7).

Following NEPA regulations and guidelines, and to the extent feasible and practical, this Draft Environmental Assessment (DEA) considered the potential combined impacts of the proposed project to be carried out by the Diocese of Lake Charles. This DEA also accounted for actions taken by other public and private entities, which could influence the environmental resources affected by the proposed action within the defined geographic area and time frame(s). The table below provides a listing and descriptions of known present, past, and reasonably foreseeable future actions undertaken by entities within the Diocese of Lake Charles and its surrounding area, which may collectively contribute to cumulative impacts when considered alongside the effects of the proposed action.

A localized analysis of effects is typically inadequate for an assessment of cumulative effects. The use of extended time frames can include further impacts on the resources, natural systems, and local communities of concern. Likewise, to comprehensively address the impacts on nearby communities, landscapes, watersheds, and atmospheric regions, it is imperative to broaden the geographic scope. In a cumulative effects analysis, it is imperative to define the project impact zone, the area influenced by the proposed action, which usually extends beyond this zone to encompass external resources (CEQ, 2007).

The Proposed Action seeks to recover from flooding and wind damages by relocating the St. Louis High School campus to an undeveloped site east of Corbina Road. The project is located at 30.21808°N, -93.20770°W in zip code 70607, bordered by Corbina Boulevard (east) and surrounded by an empty lot (north and west) and residences (south). The total area is approximately 47 acres (0.0734375 square miles), and FEMA recommends a 1.5-mile radius buffer for the cumulative impact analysis. Yet, there are no known recently completed or proposed mitigation or natural restoration projects within one mile of the project site. Table 1 below outlines current, past, and anticipated infrastructure and recovery improvement projects, including FEMA-identified activities that may contribute to cumulative impacts when combined with the proposed action's effects. It also presents the assessment of potential cumulative impacts alongside the rationale for that assessment.

Table 1. Projects that May Have the Potential to Contribute to Cumulative Impacts

Project Name/Status	Lead Agency or Firm	Location	Description	Cumulative Impact	Rationale
Southwest Coastal Louisiana Integrated Final Feasibility Report and Environmental Impact Statement / Authorized in the Water Infrastructure Improvements for the Nation Act of 2016 (WIIN Act of 2016)	USACE	Southwest Louisiana (Calcasieu and Cameron Parishes)	Identifies a plan to provide nonstructural hurricane and storm surge damage risk reduction and ecosystem restoration across 4,700 square miles in Calcasieu and Cameron Parishes in southwest Louisiana.	No effect	The expected impacts on resources would be significantly different from those expected to be affected by the proposed action and alternative, and overall expected to be beneficial to resources.
Calcasieu River & Pass, LA Operations and Maintenance / Operated and maintained annually	USACE	Calcasieu River, southwest Louisiana	Provides deep draft access to the Port of Lake Charles, which is currently the 11th largest port in the nation based on tonnage and a salt-water barrier structure located north of Lake Charles, approximately 3 miles north of the northern boundary of the deep draft ship channel.	No effect	The expected impacts on resources would be significantly different from those expected to be affected by the proposed action and alternative, and overall expected to be beneficial to resources.

The proposed project is expected to have short-term impacts, including noise, transportation disruptions, and potential utility issues during construction. Its long-term impact on residential, industrial, and commercial areas, as well as the environment, is foreseen as minimal. In assessing the proposed action's overall effects alongside other actions (as seen in Table 1), it is unlikely to result in significant adverse cumulative effects on any resource. These projects aim to restore or enhance infrastructure within designated areas or provide development recommendations in line with current building codes, with minimal environmental impact.

6.0 Public Involvement

On September 18, 2020, the official Federal Emergency Management website issued a DR-4559-LA and EM-3538-LA Public Notice, notifying the public of its intention to provide reimbursement to eligible applicants for eligible costs associated with the repair and/or replacement of facilities damaged by Hurricane Laura, which occurred between August 22 and August 27, 2020. This notification pertains to the implementation of the Public Assistance (PA), Individual Assistance (IA), and Hazard Mitigation Grant (HMGP) programs, conducted under the authority of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. §§ 5121-5207 (See Appendix 10. DR-4559-LA and EM-3538-LA Public Notice).

Also, St. Louis Catholic School recently shared an update on its official website, shedding light on the profound impact of Hurricane Laura on its campus and students. Despite the initial challenges posed by the natural disaster, the school has been actively engaged in a series of concerted efforts aimed at restoring normalcy. From considering the possibility of reconstructing the existing campus to ultimately opting for a strategic relocation to a more expansive and improved setting, the school administration has worked to ensure an enhanced learning environment for its students.

FEMA invites public participation in this proposed Federal action as part of the NEPA process. Consideration of the views and information of all interested persons promotes open communication and enables better decision-making. All agencies, organizations, and members of the public having a potential interest in the Proposed Action, including minority, low-income, disadvantaged, and Native American groups, are urged to participate in the decision-making process.

To date, FEMA has coordinated with multiple agencies regarding the Proposed Action through the submittal of SOVs. The SOVs request that each agency reviews the Proposed Action and determine if and what requirements of any formal consultations, regulatory permits, determinations, or authorizations would be needed by the different agencies.

The public is invited to comment on the Proposed Action. A legal notice has been published in *The Advocate* and *American Press* from November 21 to 26, 2024, the journals of record for Louisiana and Calcasieu Parish respectively. Additionally, the Draft EA is available for review at the Chancery of the Diocese of Lake Charles and Hotard Architects. A copy is also attached in Appendix 10.

7.0 Conditions and Mitigation Measures

Based on the studies and consultations conducted in this DEA, specific conditions must be satisfied, and mitigation measures must be implemented before and during the project's execution. It is

important to note that the general mitigation measures provided in this section might be overridden by stricter standards imposed by federal, territorial, tribal, or local government agencies responsible for issuing permits, licenses, or approvals for the project. The applicant bears the responsibility of obtaining any required permits and clearances before initiating any construction-related operations. The proposed action should adhere to the following measures, to the extent feasible and relevant, to prevent or reduce impacts on the quality of the human environment.

- To manage fugitive dust resulting from earth-moving activities, storage piles, disturbed surface areas, unpaved sections, and other construction-related operations, the project will employ one or more of the following measures: watering, coverings, wind fencing, haul bed coverings, wheel washers, vegetation, restricted site access, and street sweeping.
- To the greatest extent feasible, the project will endeavor to minimize the disturbed area and preserve the existing vegetation, while also maintaining topsoil whenever possible.
- In compliance with Executive Order 11990, due to the unavoidable impacts and loss of wetlands, compensatory wetland mitigation is required. Compensatory mitigation must be completed prior to, or concurrent with, wetland conversion activities. A minimum ratio of 1 to 1 (acreage) is required. For the wetland impacts associated with this project there is a loss of 6 acres; therefore, 6 acres of wetland mitigation credits must be purchased at an approved mitigation bank. Proof of purchase of mitigation bank credits must be provided to FEMA and GOHSEP. Documentation will be requested at project close out. All credits must be purchased and support wetlands in the State of Louisiana.
- Existing trees and other vegetation within the construction area that might be affected by the public right-of-way will be safeguarded on a case-by-case basis. Protective measures will involve the installation of fencing and appropriate signage. Any necessary trimming, root pruning, or removal of trees or stumps within the public right-of-way due to construction will be minimized and conducted under the supervision of a licensed arborist. If feasible, any trees removed from the construction site within the public right-of-way will be relocated to an area near the project site. Any disturbed existing vegetation or ground cover resulting from construction activities will be restored through seeding and fertilization.
- Per Louisiana Administrative Code 1-315 B.6, the Society of the Roman Catholic Church of the Diocese of Lake Charles would be required to plant two trees for every tree removed.
- The contractor will be responsible for developing and maintaining a comprehensive Storm Water Pollution Prevention Plan (SWPPP) that outlines the Contractor's strategies to prevent stormwater collection system contamination during the project. Each project's SWPPP will align with the requirements of the Municipal Separate Storm Sewer System (MS4) Permit for the area. Contractors must take all necessary precautions to prevent the entry of fuels, oils, asphalt, concrete, chemicals, and other hazardous materials into the drainage system and groundwater table as per relevant specifications. Implementation of Storm Water Control Measures (SCMs) will encompass safeguarding the storm drain system, spill prevention and cleanup, employee training, site cleanliness, and temporary erosion controls. Residues from dust collectors, concrete mixers, vehicle wash racks, and entrance/exit debris will be appropriately disposed of at an approved disposal facility.

- Create stabilized construction entrances and exits utilizing methods such as employing large, crushed rocks, stone pads, steel wash racks, hose-down systems, and pads to effectively manage construction-related traffic and minimize environmental impact.
- Calcasieu Parish’s Code of Ordinances has made unlawful the operation of “any equipment used in construction work within one hundred sixty-five (165) feet of any residential or noise-sensitive area between sunset and sunrise on weekdays and Saturdays, and 9:00 p.m. to 8:00 a.m. on Sundays and holidays, except for emergency work”. Additionally, all construction machinery and vehicles must be equipped with effective sound muffling devices and operated in a manner that minimizes noise while ensuring efficient work performance. Activities in the vicinity of noise and vibration-sensitive areas, such as churches, hospitals, and schools, will be minimized to the extent practically feasible.
- Guarantee the proper maintenance of equipment, which includes regular engine upkeep, ensuring adequate tire inflation, and the proper maintenance of pollution control devices.
- Implement thorough monitoring and control of construction traffic as necessary. Ensure that all construction operations adhere to the safety regulations outlined in the Occupational Safety and Health Act (OSHA). Provide a minimum of 48 hours’ notice to residents and emergency response agencies before any street closures and expected areas of reduced water pressure.
- The project construction may entail the handling of potentially hazardous materials, such as petroleum products, cement, caustics, acids, solvents, paint, electronic components, pesticides, herbicides, fertilizers, and treated timber, which could lead to the generation of limited quantities of hazardous wastes. It is imperative to implement suitable measures to prevent, minimize, and manage the occurrence of spills involving hazardous materials. Moreover, any hazardous and non-hazardous wastes generated during the construction process must be disposed of in strict accordance with the pertinent regulations at the Federal, state, and local levels.
- To mitigate indirect effects such as erosion, sedimentation, dust, and other disturbances associated with the construction, the contractor needs to adhere to all relevant local, state, and federal regulations about sediment control, solid waste disposal, spill management, and the release of surface runoff and stormwater into nearby waters of the U.S. and surrounding drainage areas.
- Ensure that all new construction adheres to current codes and standards. By 44 C.F.R. § 9.11(d)(6), projects must not be constructed in a floodplain management standard that offers less protection than what the community has adopted through its participation in the National Flood Insurance Program. It is the responsibility of the applicant to coordinate all construction activities with the local floodplain administrator regarding floodplain permit(s) before commencing any activities and to maintain compliance with officially adopted local floodplain ordinances. Documentation of all coordination related to these permit(s) should be provided to the local floodplain administrator, the Louisiana Governor's Office of Homeland Security and Emergency Preparedness (LA GOHSEP), and FEMA as part of the permanent project file. Under 44 CFR 9.11 (d) (9), whenever feasible, mitigation or minimization standards should be implemented.
- If human bones or unmarked grave(s) are discovered within the project area, adherence to the Louisiana Unmarked Human Burial Sites Preservation Act (R.S. 8:671 et seq.) is mandatory.

The applicant is responsible for promptly informing the law enforcement agency of the relevant jurisdiction within twenty-four hours of the discovery. Additionally, FEMA and the Louisiana Division of Archaeology can be notified at 225-342-8170 within seventy-two hours of the discovery.

- If archaeological artifacts, whether prehistoric or historic, are discovered during the project's execution, the applicant must halt work in the proximity of the finding and implement all necessary measures to mitigate potential damage. It is imperative that the applicant promptly notifies their designated Public Assistance (PA) contacts at FEMA, who will subsequently engage FEMA's Historic Preservation (HP) staff. Work should not resume until FEMA HP concludes consultation with the State Historic Preservation Officer (SHPO) and any other relevant parties.
- Bald eagles, having made a remarkable recovery, were removed from the List of Endangered and Threatened Species on August 8, 2007. Despite this change in status, it is crucial to note that bald eagles remain safeguarded under the Bald and Golden Eagle Protection Act (BGEPA) (16 U.S.C. 668 et seq.). To aid in the preservation of these majestic birds, the Service has formulated the National Bald Eagle Management (NBEM) Guidelines, designed to equip landowners, land managers, and others with comprehensive information and recommendations to mitigate potential project impacts on bald eagles. Particularly, these guidelines focus on preventing any form of "disturbance," which is strictly prohibited under the BGEPA. Outlined in the NBEM Guidelines are the following recommendations: (1) maintaining a designated distance between the project's activity and the nest (buffer area); (2) preserving natural areas, preferably forested, between the project's activities and nest trees (landscape buffers); and (3) avoiding specific activities during the breeding season. All personnel on-site must be made aware of the potential presence of nesting bald eagles within the project area. In the event of the discovery of such nests within or adjacent to the proposed project area, it is essential to conduct an assessment to ascertain whether the project is likely to disturb the nesting bald eagles. Any discovery of a bald eagle nest should be immediately reported to the relevant authorities.
- The US Fish and Wildlife Service on October 8, 2020, recommended reclassifying the red-cockaded woodpecker as a threatened species. This proposal included a section 4(d) rule outlining specific prohibitions and exceptions that we deemed necessary and advisable for the conservation of the red-cockaded woodpecker. Initially, these prohibitions involved the restriction of incidental take resulting from the damage or conversion of currently occupied red-cockaded woodpecker nesting and foraging habitat. Additionally, forest management practices within these habitats were to be restricted. The operation of vehicles or mechanical equipment, use of floodlights, and human presence within an active cavity tree cluster during the red-cockaded woodpecker breeding season were also proposed to be prohibited. Moreover, the installation of artificial cavity inserts, drilled cavities, or cavity restrictor plates, as well as activities that render active cavity trees unusable to red-cockaded woodpeckers, were included in the proposed restrictions. The use of insecticides or herbicides on any standing pine tree within 0.50 miles from the center of an active cavity tree cluster of red-cockaded woodpeckers was also prohibited (85 FR 63498, October 8, 2020). To further protect the red-cockaded woodpecker's habitat, the following additional measures are suggested: restricting vehicle use on existing roads and avoiding the construction of new roads

and trails within clusters. Limiting silvicultural and cultural operations to daylight hours, with an emphasis on avoiding activities within 1-2 hours of dawn and dusk. Permitting mechanized equipment in a cluster during the non-breeding season for red-cockaded woodpecker management activities only. Prohibiting habitat management activities other than prescribed burning during the breeding season (April – July).

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