Draft Environmental Assessment
Relocation and New Construction of South Terrebonne Middle School

FEMA-DR-4611-LA

Bourg, Louisiana (Chauvin, Louisiana – original location)

Terrebonne Parish

December 2024

U.S. Department of Homeland Security
Federal Emergency Management Agency, Region VI
Louisiana Integration and Recovery Office
1500 Main Street
Baton Rouge, LA 70802

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LIST OF ACRONYMS AND ABBREVIATIONS

§	Section (symbol)
§§	Sections
µg/m3	Micrograms per meter cubed
ACHP	Advisory Council on Historic Preservation
ACM	Asbestos Containing Material
AEP	Annual Exceedance Probability
AGL	Above Ground Level
a.m.	Ante Meridiem (before midday)
APE	Area of Potential Effects
ASCE	American Society of Civil Engineers
ASL	Above Sea Level
BA	Biological Assessment

BFE	Base Flood Elevation
BGEPA	Bald and Golden Eagle Protection Act
BMPs	Best Management Practices
C.F.R.	Code of Federal Regulations
CAA	Clean Air Act
CBRA	Coastal Barrier Resource Act
CBRS	Coastal Barrier Resources System
CEQ	Council on Environmental Quality
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
Ch.	Chapter
CO	Carbon Monoxide
CPRA	Coastal Protection and Restoration Authority
CUP	Coastal Use Permit
CWA	Clean Water Act
CZMA	Coastal Zone Management Act
dB	Decibels
DEA	Draft Environmental Assessment
DHS	U.S. Department of Homeland Security
DNL	Day-Night Average Sound Level
e.g.	exempli gratia (for example)
E.O.	Executive Order
EFH	Essential Fish Habitat
EIS	Environmental Impact Statement
EPCRA	Emergency Planning and Community Right-to-Know Act
ESA	Endangered Species Act
et seq.	et sequentes (and the following)
FEMA	Federal Emergency Management Agency
FFE	First Floor Elevation
FIRM	Flood Insurance Rate Map
FMPs	Fisheries Management Plans
FONSI	Finding of No Significant Impact
FPPA	Farmland Protection Policy Act
ft	foot/feet
FWCA	Fish and Wildlife Coordination Act
GIWW	Gulf Intracoastal Water Way
HMTA	Hazardous Materials Transportation Act
HSDRR	Hurricane and Storm Damage Risk Reduction
HUC-8	Hydrologic Unit Code-8
i.e.	id est (that is)
IA	Individual Assistance
IPaC	Information, Planning, and Conservation
km2	Kilometers squared
kt	Knots
L	Length
LA GOHSEP	Louisiana Governor's Office of Homeland Security and Emergency Preparedness
LA	Louisiana
LCRP	Louisiana Coastal Resources Program
LDEQ	Louisiana Department of Environmental Quality
LDNR	Louisiana Department of Natural Resources

WDP	Louisiana Wildlife Diversity Program
LDOA	Louisiana Division of Archaeology
LF	Linear Feet
LPDES	Louisiana Pollutant Discharge Elimination System
MBTA	Migratory Bird Treaty Act
MOA	Memorandum of Agreement
mph	Miles per Hour
MSA	Magnuson-Stevens Fishery Conservation and Management Act
MTG	Morganza to the Gulf Hurricane Protection System
NAAQS	National Ambient Air Quality Standards
NBEM	National Bald Eagle Management
NEPA	National Environmental Policy Act
NESHAP	National Emission Standards for Hazardous Air Pollutants
NHPA	National Historic Preservation Act
NOAA	National Oceanic and Atmospheric Administration
NOx	Nitrogen Oxides
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NWI	National Wetland Inventory
OCM	Office of Coastal Management (LDNR)
P.L.	Public Law
p.m.	Post Meridiem (after midday)
PA	Public Assistance; Programmatic Agreement
Pb	Lead
PCB	Polychlorinated biphenyls
PM10	Particulate Matter of 10 microns or less
PM2.5	Particulate Matter of 2.5 microns or less
PNs	(FEMA) Project Numbers
Ppb	Parts Per Billion
ppbv	Parts per Billion by Volume
RCRA	Resource Conservation and Recovery Act
SDWA	Safe Drinking Water Act
SF	Square Feet
SFHA	Special Flood Hazard Area
SHPO	State Historic Preservation Office/Officer
SIP	State Implementation Plan
SO2	Sulfur Dioxide
SONRIS	Strategic Online Natural Resources Information System
SOV	Solicitation of Views
SSA	Sole Source Aquifer
Stat.	Statute
STHS	South Terrebonne High School
STMS	South Terrebonne Middle School (proposed)
SWPPP	Stormwater Pollution Prevention Plan
TMDLs	Total Maximum Daily Loads
TPSD	Terrebonne Parish School District
TSCA	Toxic Substances Control Act
U.S.C.	U.S. Code

USACE	U.S. Army Corps of Engineers
USDA	U.S. Department of Agriculture
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
W	Width
WOUS	Waters of the United States

1.0 INTRODUCTION

1.1 Project Authority

Hurricane Ida made landfall on August 29, 2021, at Port Fourchon, Louisiana, as a Category 4 hurricane with sustained winds of more than 150 miles per hour and a minimum central pressure of 930 millibars. President Joseph Biden, Jr. declared a major disaster for the State of Louisiana (FEMA-DR- 4611-LA) on August 29, 2021, 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), the President's Council on Environmental Quality regulations implementing NEPA (Title 40 of the CFR, Parts 1500 to 1508), and FEMA's Instruction 108-1-1 and DHS Instruction 023-01-001-01, Rev. 1, pursuant to Section 102 of NEPA. 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 26, 2021, with 130-kt (150 mph) winds, Port Fourchon, Louisiana, experienced the arrival of Hurricane Ida, a Category 4 hurricane, second only in intensity and damage to Hurricane Katrina and tied in intensity with two other Louisiana hurricanes, Hurricane Laura in August 2020 and the Last Island Hurricane in August of 1856. From landfall, Hurricane Ida traveled west of LaPlace and then north between Baton Rouge and Hammond, Louisiana. After landfall, Hurricane Ida decreased in intensity to a tropical storm as it headed towards southwestern Mississippi. Resulting storm surges ranged in recorded intensity from 9 to 14 ft AGL in Plaquemines Parish on the east bank of the Mississippi River to 3-6 ft AGL in Terrebonne Parish. The intensity in storm surge caused overtopping of local levee systems and widespread destruction.

On August 26, 2021, Louisiana Governor, John Bel Edwards, ordered a state of emergency for then Tropical Storm Ida throughout Louisiana. On August 27, 2021, President Joseph R. Biden, Jr. declared that an emergency exists in the State of Louisiana and ordered Federal assistance to supplement State and local response efforts due to the emergency conditions resulting from Tropical Storm Ida. The President's action authorizes the Department of Homeland Security, FEMA, to coordinate all disaster relief efforts which have the purpose of alleviating the hardship and suffering caused by the emergency on the local population, and to provide appropriate assistance for required emergency measures, authorized under Title V of the Stafford Act, to save lives and to protect property and public health and safety, and to lessen or avert the threat of a catastrophe in all 64 Louisiana parishes. On August 29, 2021, the President declared that a major disaster exists in the State of Louisiana and ordered Federal aid to supplement State, Tribal, and local recovery efforts in the areas affected by Hurricane Ida beginning on August 26, 2021, and continuing. With the Presidential Disaster Declaration, twenty-five Louisiana Parishes, including Terrebonne Parish, were deemed eligible for Public Assistance (PA) project categories A-G, whereas all Louisiana Parishes were deemed eligible for PA Category B projects.

As a result of Hurricane Ida, Lacache Middle School in Chauvin, Louisiana, sustained severe damage to all of its main and ancillary structures. The school community was displaced at the start of the new school year. In response, temporary repairs and mold remediation were conducted to safely bring students back to

the school by October of 2021. Students continued enrollment at Lacache Middle School until two temporary modular buildings, offering 12 classrooms each, in August of 2023, were placed at the South Terrebonne High School (STHS) campus' east parking lot (29.563808, -90.639507). As of this writing, the Lacache Middle School students have been transported by bus, and parent drop off at the temporary facility for one year. The original Lacache Middle School facility is located at 5266 Highway 56, Chauvin, LA 70344 (29.457848, -90.590067). See Figure 1, *Community Map of Lacache Middle School Location*, in Chauvin, Louisiana. See Figure 2, *Aerial Map of Lacache Middle School Location*, in Chauvin, Louisiana.

Ten additional Terrebonne Parish School District (TPSD) locations (Table 1) have physical elements, mostly portable classrooms, that are eligible for FEMA-funded replacement. For Lacache Middle School and these ten other property elements, the Louisiana Governor's Office of Homeland Security and Emergency Preparedness (LA GOHSEP) has requested, on behalf of TPSD, an Improved Project so that these funds may be used to build a new middle school at a new location.

Table 1. Site Name, Location, Facility Type and Description of Project Donor Facilities

Site	Street Address	Type	(Quantity) and Description
Acadian Elementary	1020 Saadi Street, Houma, LA 70363	Portables	(3) 713 SF each, Interior/Exterior damages.
Bourg Elementary	4413 Saint Andrew Street, Bourg, LA 70343	Portable	(1) 1536 SF Roof and some interior components.
Coteau Bayou Blue Elementary	2250 Coteau Road, Houma, LA 70364	Portable	(1) 768 SF, Interior/Exterior damages.
East Houma	222 Connely St., Houma, LA 70363	Modular	(1) 7936 SF (124 FT L x 64 FT W) slab-on-grade, wood-framed modular structure with 8 classrooms, 3 restrooms, and janitor's closet.
East Street - Terrebonne Alternative Placement Program Site (TAPPS)	609 East Street, Houma, LA 70363	Building	1-story structure, a component of three (3) adjoining buildings, building 1, cafetorium, 4535 SF; building 2, classrooms and offices, 12,795 SF; building 3, classrooms, 5200 SF. The building functioned as a learning institution. Total = 8 classrooms, 3 restrooms, and janitor's closet.
Grand Caillou Elementary	3933 Grand Caillou Road, Houma, LA 70363	Modular and portables	(1) modular and (9) portables with Interior/Exterior damages.
Lacache Middle School	5266 Highway 56, Chauvin, LA 70344	Portables and buildings	(5) Portable buildings and (2) slab on grade buildings. Interior/Exterior damages / Main Building is a 20,130 square foot 2 story brick veneer building with aluminum storefront windows and a coal tar pitch with gravel flat roof system. Building has offices, classrooms, library, restrooms, and other associated rooms.
STHS	3879 Highway 24, Bourg, LA 70343	Portables	(4) Interior/Exterior damages.

Site	Street Address	Type	(Quantity) and Description
Upper Little Caillou Elementary	4824 Highway 56, Chauvin, LA 70344	Portables	(2) Portable buildings, totaling three classrooms.
Village East Elementary	315 Lafayette Woods, Houma, LA 70363	Portables	(1) 917 SF (32.4 FT x 28.3 FT) Pier-supported, (6) steel-framed portable structures. Interior/Exterior damages.
West Park / Federal Programs Classroom Addn.	7573 West Park Avenue, Houma, LA 70360	Building	(1) 4080 SF slab on grade wood frame building with brick veneer walls and raised panel metal gable roof.

Table data from FEMA Grants Manager Project Numbers: 666945, 673889 and 675320.

FEMA received a letter from LA GOHSEP dated July 23, 2024, requesting a Section 428 (Stafford Act) fixed cost project review from TPSD (Subrecipient) to construct a new middle school (South Terrebonne Middle School [STMS]) to house Lacache Middle School (Figure 2) students from the combined donor funds from FEMA projects 675320 (Lacache Middle School Campus Buildings), project number 673889 (East Street Campus), and project number 666945 (Buildings, Modulars and Portables for Capped Funding) for the construction of the new school. FEMA also received a letter from LA GOHSEP dated July 26, 2024, transmitting TPSD's request for FEMA to begin performing an Environmental Assessment (EA) on the proposed South Terrebonne Middle School Improved Project.

The proposed South Terrebonne Middle School is located immediately adjacent and northwest of the existing STHS at 3879 Highway 24, Bourg, LA 70343 (29.56427, -90.64006) located in northeastern Terrebonne Parish, approximately 4.3 miles east-southeast of central Houma, LA and 43.5 miles southwest of New Orleans, LA (Figure 3). See Figure 4, *Aerial View of Proposed South Terrebonne Middle School Location*, in Bourg, Louisiana.

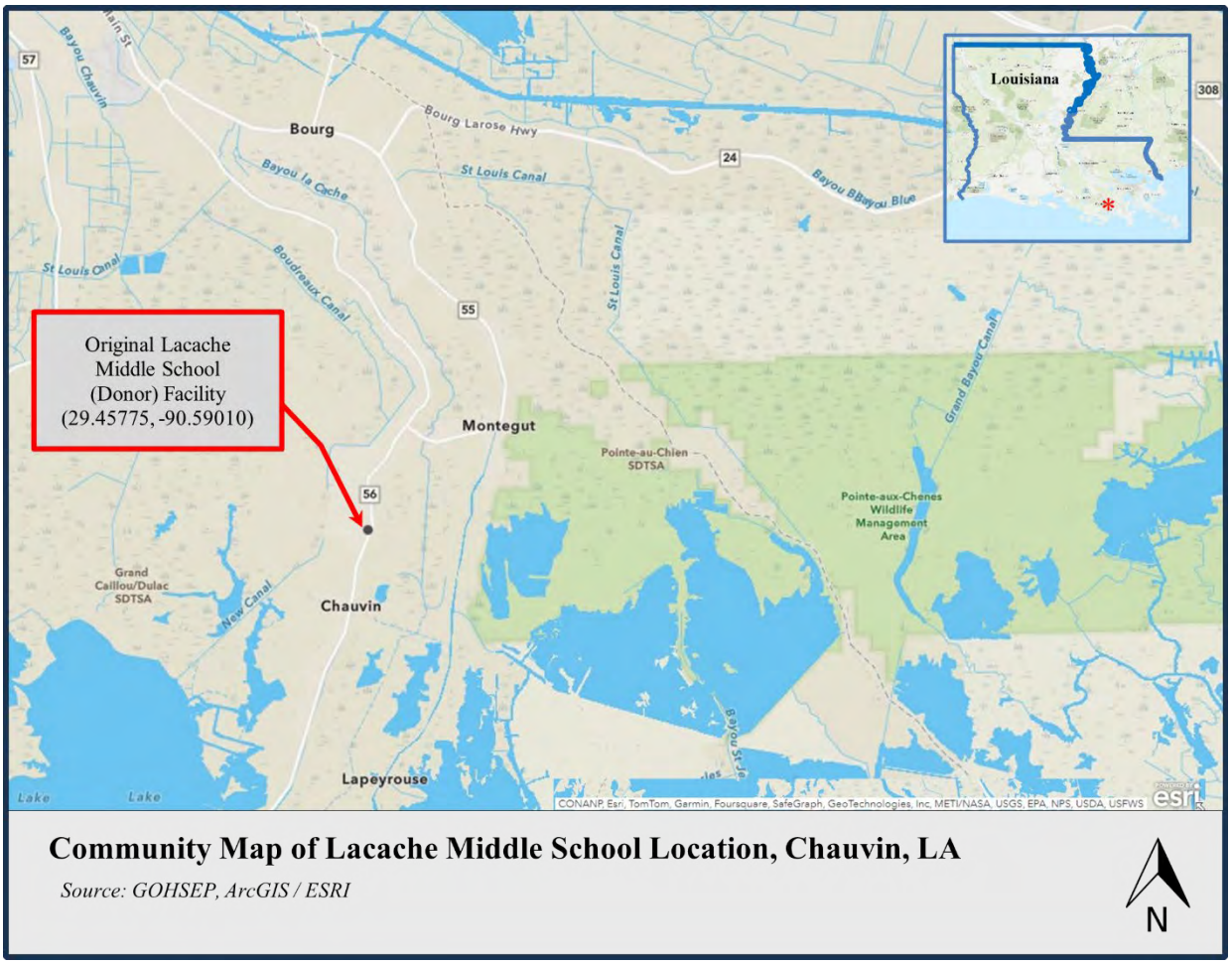

Figure 1 – Community Map of Lacache Middle School Location

Figure 2 - Aerial Map of Lacache Middle School Location

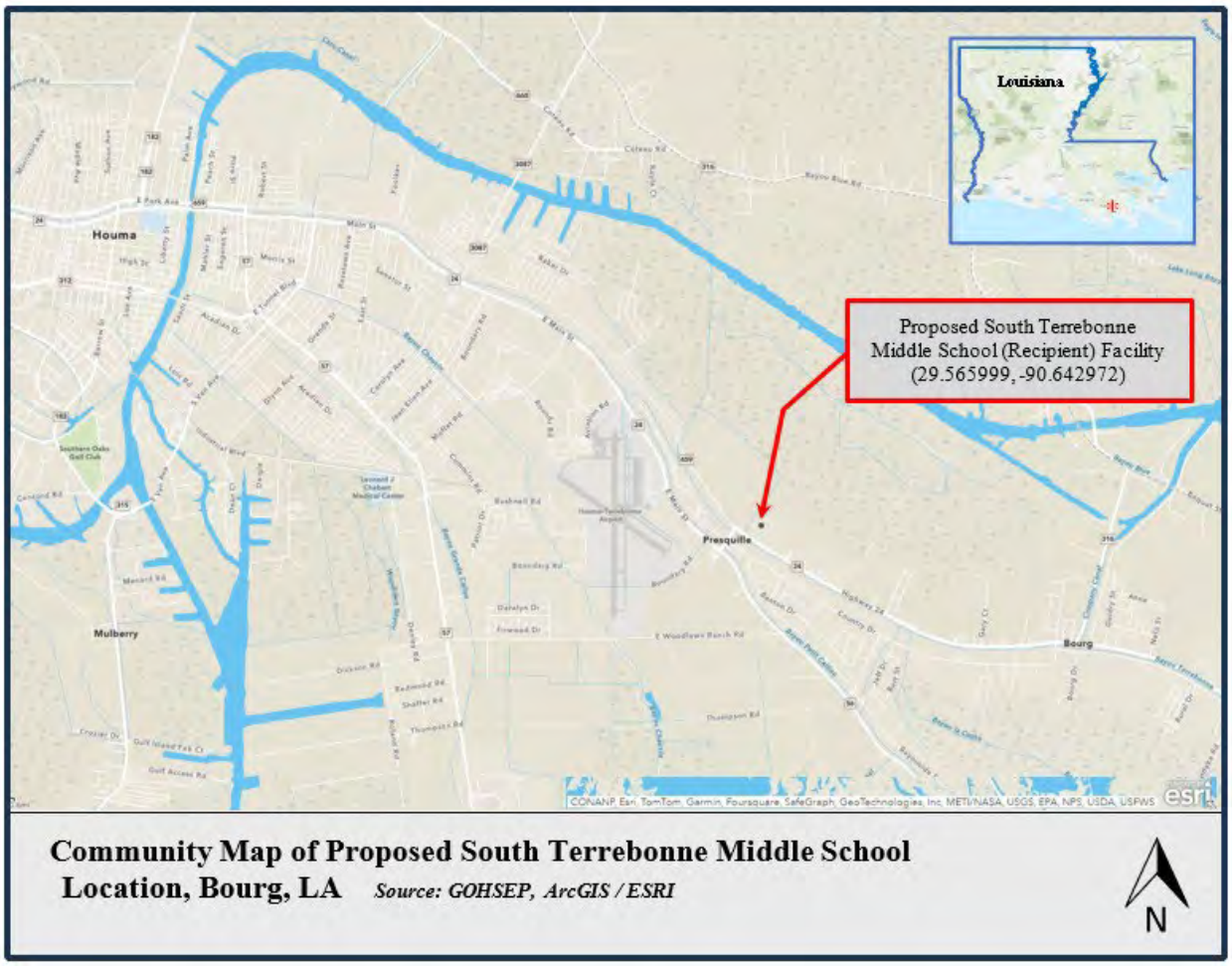

Figure 3 – Community Map of Proposed South Terrebonne Middle School Location

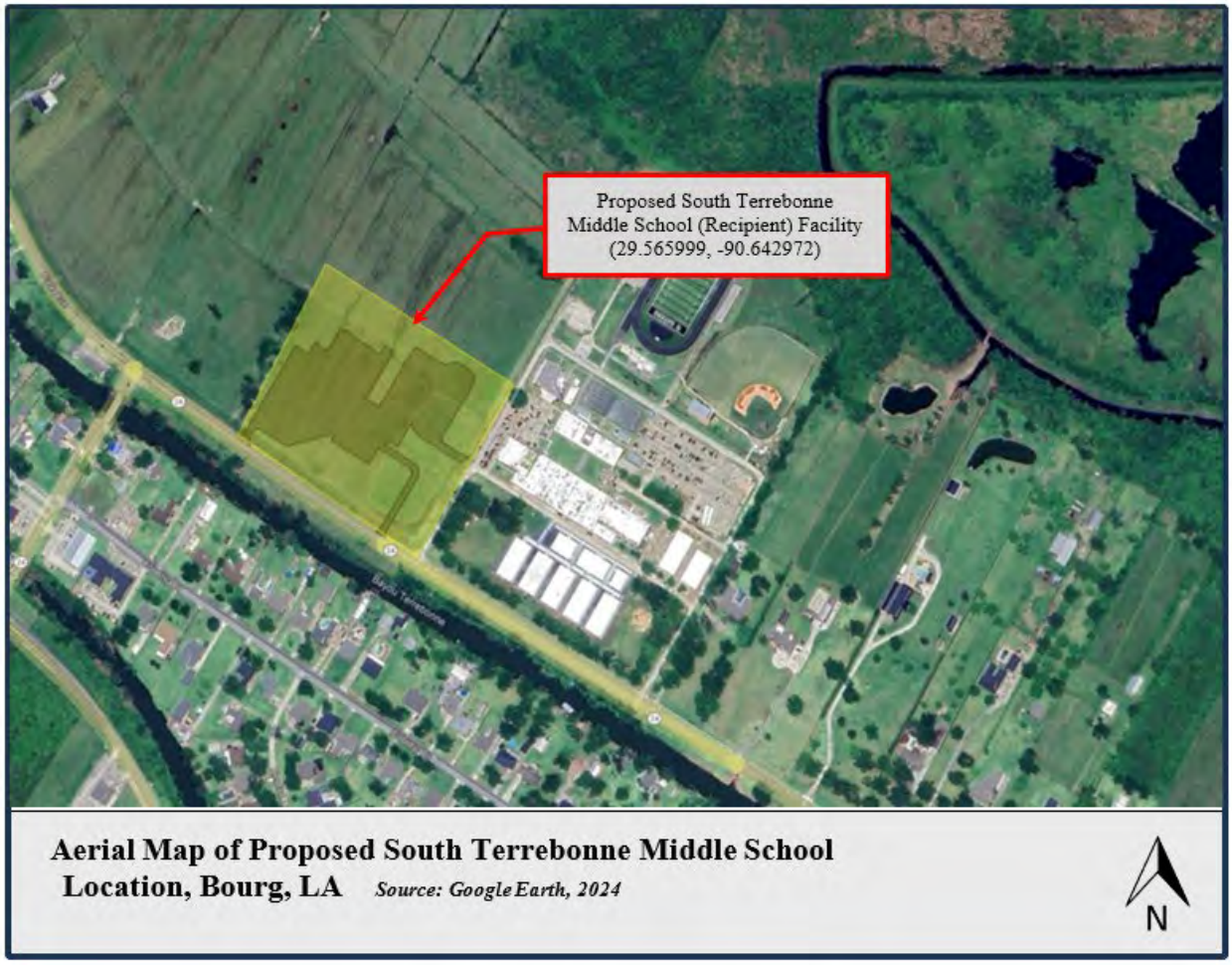

Figure 3 – Aerial View of Proposed South Terrebonne Middle School Location

2.0 PURPOSE AND NEED

Lacache Middle School has been subject to repetitive storm-related damage, and the parish population continues a northward shift with each tropical system that affects the area. Currently, and for the past year, the Lacache Middle School student body has been using two modular educational facilities with 12 classrooms each located in the eastern parking lot of the STHS.

The construction of a permanent Terrebonne Parish Middle School is needed in a manner that best mitigates future flood hazards and services the community for the Terrebonne Parish School District to meet its objective. Normal operations at STHS also need to resume allowing full utilization of parking areas, which are currently occupied by the modular units housing the Lacache Middle School student body.

3.0 ALTERNATIVES

3.1 Description of Alternatives

The NEPA process involves assessing the environmental impacts of federal action and its alternatives. Per 40 CFR 1501.5I(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 TPSD's purpose and need. Three alternatives are evaluated: 1) No Action, 2) Demolition and Reconstruction within Existing Footprint, and 3) Demolition and Reconstruction at an Alternate Location (Proposed Action).

3.1.1 Alternative 1 - No Action Alternative

Currently, students at Lacache Middle School are in temporary facilities located in the east parking lot at STHS (Figure 5), 3879 LA-24, Bourg, LA 70343 (29.563808, -90.639507). The Lacache Middle School students were relocated to this site in August 2023. If no action takes place, TPSD would stop lease payments on the temporary campus and purchase the modular buildings. The current campus contains two modular buildings with 12 classes in each. It serves the purpose of basic education with classrooms, library, and administrative areas. The Lacache Middle School student body shares the kitchen, cafeteria, and recreational areas with STHS students. Since the student relocation, STHS has one less parking lot for its students, faculty, and visitors to accommodate the Lacache Middle School temporary campus. Under this No Action Alternative, the Lacache Middle School would not be rebuilt. This alternative will be evaluated throughout this DEA to serve as a baseline comparison.

3.1.2 Alternative 2 - Rebuild Lacache Middle School at Original Site

The original Lacache Middle School campus (Figures 1 & 2) consists of three buildings and five portables located at 5266 Louisiana 56, Chauvin LA 70344 (29.45775, -90.59010). After Hurricane Ida, the campus was deemed substantially damaged by the local floodplain manager. The campus is located in an AE-Coastal Floodplain, EL 12 feet Above Sea Level (ASL). Under Alternative 2, TPSD would construct a new building on the campus elevated on piers and built to current codes and standards. This building would encompass the three main buildings and five portables under one roof. The Lacache Middle School is the most southern campus owned by TPSD and is approximately 25 miles from the Gulf of Mexico. This alternative could pose a potential risk to the facility in the future, especially in terms of vulnerability to flooding. Additionally, the cost for rebuilding at this location is substantially higher due to the elevation requirements. This alternative will be evaluated throughout this DEA.

3.1.3 Alternative 3 - Rebuild Lacache Middle School at Alternate Location (Proposed Action)

Under Alternative 3, the Lacache Middle School would be rebuilt in an alternate location adjacent to the existing STHS (Figure 5; [GPS 29.565999, -90.642972]). The proposed location is largely within an AE-Coastal Floodplain, EL 7 feet ASL. The Alternative 3 consists of the construction of a two-story, two-winged, single-campus building with two adjoining parking areas with a gross area of 81,564 square feet. The proposed facility would have 32 standard classrooms, 2 physical education classrooms, and supporting rooms for IT, band, resources, janitorial, and faculty. The proposed STMS facility would also have a cafeteria and gymnasium. As a requirement, the facility is proposed to be built on a foundation fully compliant with American Society of Civil Engineers (ASCE) 24-14 section 4.5.5 Deep Foundations where the structure would be supported on a deep foundation (pile supported). While the floor slab would be formed on fill, it is not a structural fill nor classified as a shallow foundation as defined in ASCE 24 4.5.1.1. The fill used is not supporting the foundation but only acting as formwork for the slab. Once the slab has cured, the slab and foundation would be 100% pile-supported and does not rely on the fill for structural

support. This fill could be fully removed or eroded, and the loss of that material would not impact the structural integrity of the building's foundation. This alternative will be evaluated throughout this DEA.

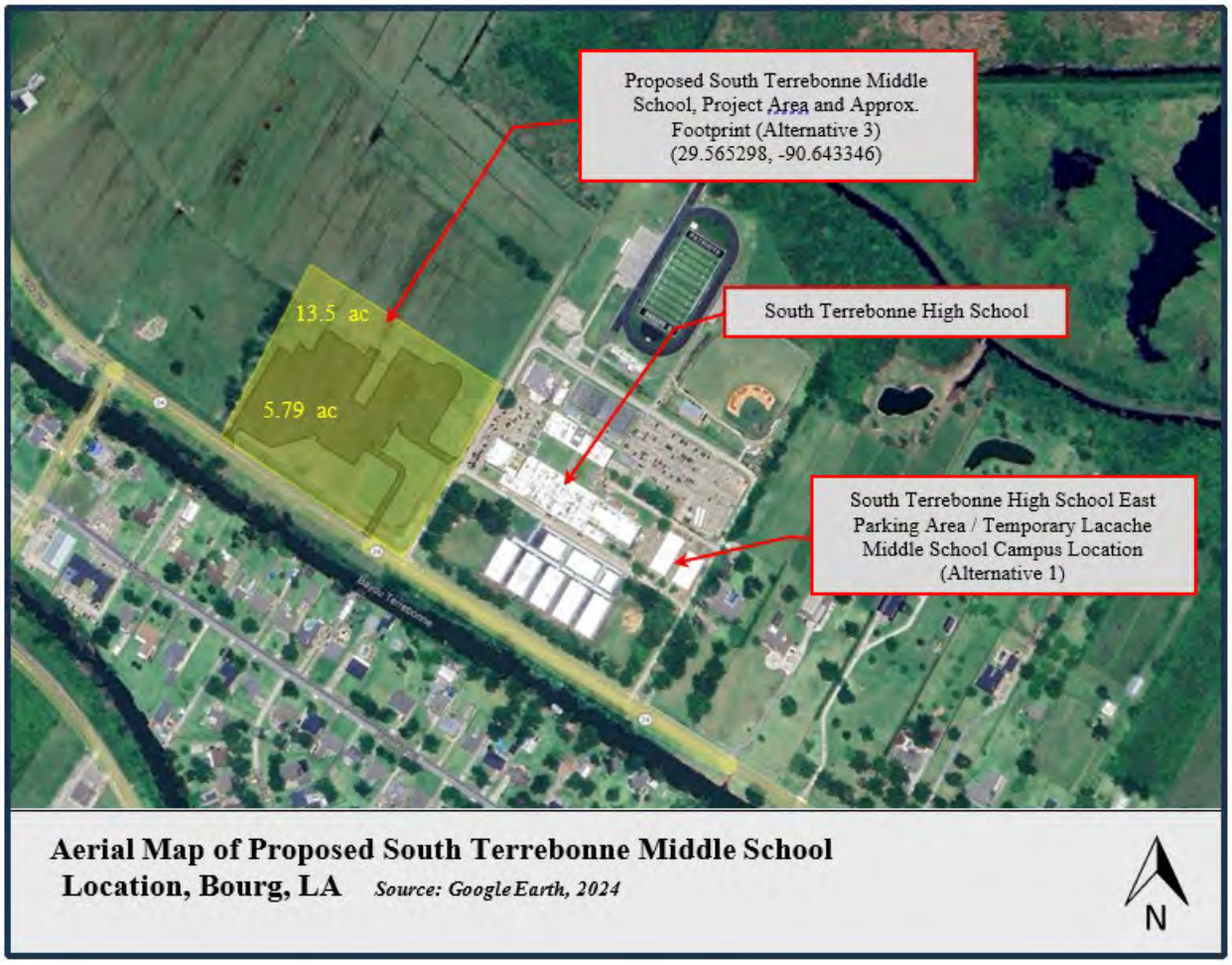

Figure 4 – South Terrebonne High School, Lacache Middle School Temporary Campus, and the Proposed South Terrebonne Middle School Campus Locations.

4.0 AFFECTED ENVIRONMENT AND ALTERNATIVES ANALYSIS

4.1 Geology, Soils and Topography

4.1.1 Regulatory

4.1.1.1 Farmland Protection Policy Act

The Farmland Protection Policy Act (FPPA, [7 USC 4201 – 4209]) is intended to minimize the impact federal programs have on the unnecessary and irreversible conversion of farmland to nonagricultural uses. It assures that, to the extent possible, federal programs are administered to be compatible with state and local units of government, and private programs and policies to protect farmland. Federal agencies are required to develop and review their policies and procedures to implement the FPPA 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.

For the purpose of FPPA, farmland includes Prime Farmland, Unique Farmland, and Land of Statewide or Local Importance. Farmland subject to FPPA requirements does not have to be currently used for cropland. It can be forest land, pastureland, cropland, or other land, but not water or urban built-up land.

4.1.2 Existing Conditions

The proposed project site is in the Southern Holocene Meander Belts (subecoregion) of the Mississippi Alluvial Plain, Louisiana ecoregion (Figure 6). The Mississippi River watershed drains all or parts of 31 states, 2 Canadian provinces, and approximately 1,243,000 miles before the river finally reaches the Gulf of Mexico. The Mississippi Alluvial Plain is mostly a broad, flat alluvial plain with river terraces, swales, and natural levees providing the main elements of topographical relief in delta complex areas of southern Louisiana. Soils here are typically finer textured and more poorly drained than the upland soils of adjacent ecoregions (USACE 2019). More specifically, the Southern Holocene Meander Belts subecoregion (73k, [Figure 6]) are relict Mississippi River channels now occupied by smaller tributaries or bayous (*e.g.*, Bayou Terrebonne) and associated wetlands. These areas, and wetlands further south, are collectively referred to as a delta complex.

The extent of topographic relief in Terrebonne Parish ranges from 0 to 13 feet ABSL, with most of the Parish being between 0 to 3 feet ABSL (Figure 7). As seen in Figure 7, bilateral topographic ridges generally follow the Holocene Mississippi River alluvial deposits about the bayous throughout Terrebonne Parish. It is these alluvial deposits north of Bayou Terrebonne where the proposed project and the original Lacache Middle School site adjacent and west of Bayou Petite Caillou are located. Consistent with the bayou topographic ridges, the proposed site topography ranges from approximately 9 feet in the south along Highway 24, adjacent to Bayou Terrebonne, to 5 ft in the north for a near level but gently sloping south to north inclination of -0.265%. The Lacache Middle School site ranges in elevation from 4 ft in the east to 2 ft ASL in the west, with only 2 vertical feet in elevation difference, the site has a near level, east to west inclination of -0.183%.

Alluvial deposits are often the most fertile soils and are therefore selected for agricultural production. In Terrebonne Parish, the two most common agricultural production types are sugar cane and forage. The proposed project area is currently in and has been used for non-irrigated forage production since at least 1962. Per the NRCS soil report, all soil types within the proposed project area have also been classified by NRCS as Prime Farmland.

The alluvial soils found within the proposed project area are: Cancienne silty clay loam, 0 to 1 percent slopes (CdA); Cancienne silt loam, 0 to 1 percent slopes (CbA); and Schriever clay, 0 to 1 percent slopes, rarely flooded (ShA). Soil textures from 0 to 80 inches for CdA and CbA are silty loams to silty clay loam, and the ShA are clays (Figure 8). These soil textures are consistent with Holocene alluvial deposits. Field conditions, as determined from the Ardaman & Assoc., 2024, Subsurface Exploration and Geotechnical Evaluation report, however, differ from the NRCS Soil Map with heavy clay soils to a depth of 2 to 8 ft and silty soils to 23 ft followed by medium dense silty sand to about 30 ft in the southern CbA and CdA mapped areas. The subsurface and geotechnical testing report also found the near surface soils to be highly compressible under nominal loading (Alswaeer and Woodward 2024).

The alluvial soils found within the original Lacache Middle School site are: Cancienne silty clay loam, 0 to 1 percent slopes (CdA) and Schriever clay, 0 to 1 percent slopes, rarely flooded (ShA). Both soils are listed as Prime Farmland by NRCS (Figure 9). These soil textures are also consistent with Holocene alluvial deposits.

In a response to a Solicitation of Views (SOV) request regarding the proposed site as identified in this DEA, NRCS indicated that the proposed site was exempt from the rules and regulations of the FPPA per Subtitle I of Title XV, Section 1539-1549, due to being within an urban area (Appendix 1). Because the Lacache Middle School original site was already developed, and the entire developed and undeveloped areas of the site are less than 10 acres (approx. 8.43 acres), a request for NRCS review of Prime Farmland at this site was not initiated.

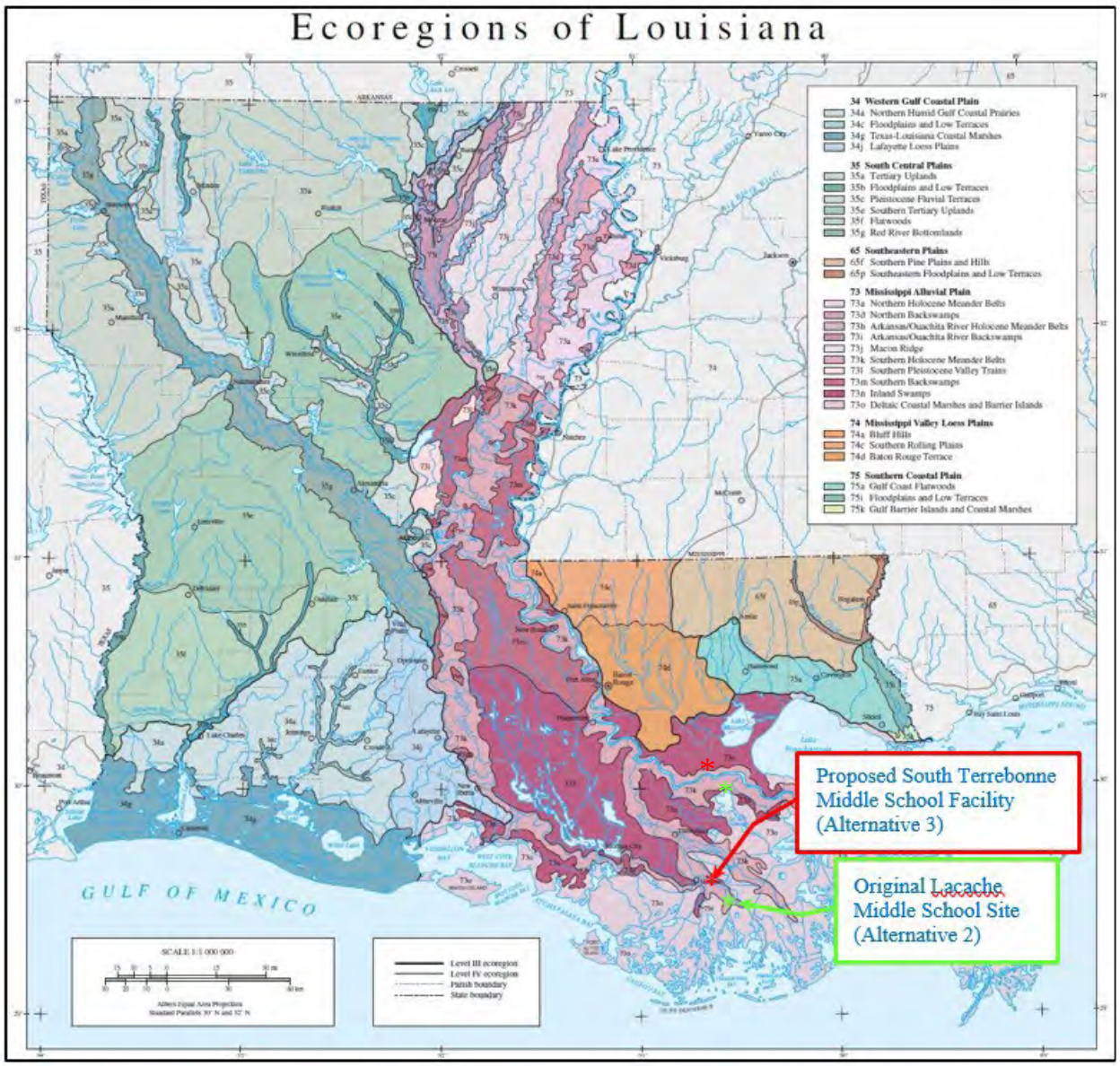

Figure 5 - Ecoregions of Louisiana, U.S. Geological Survey, 2006

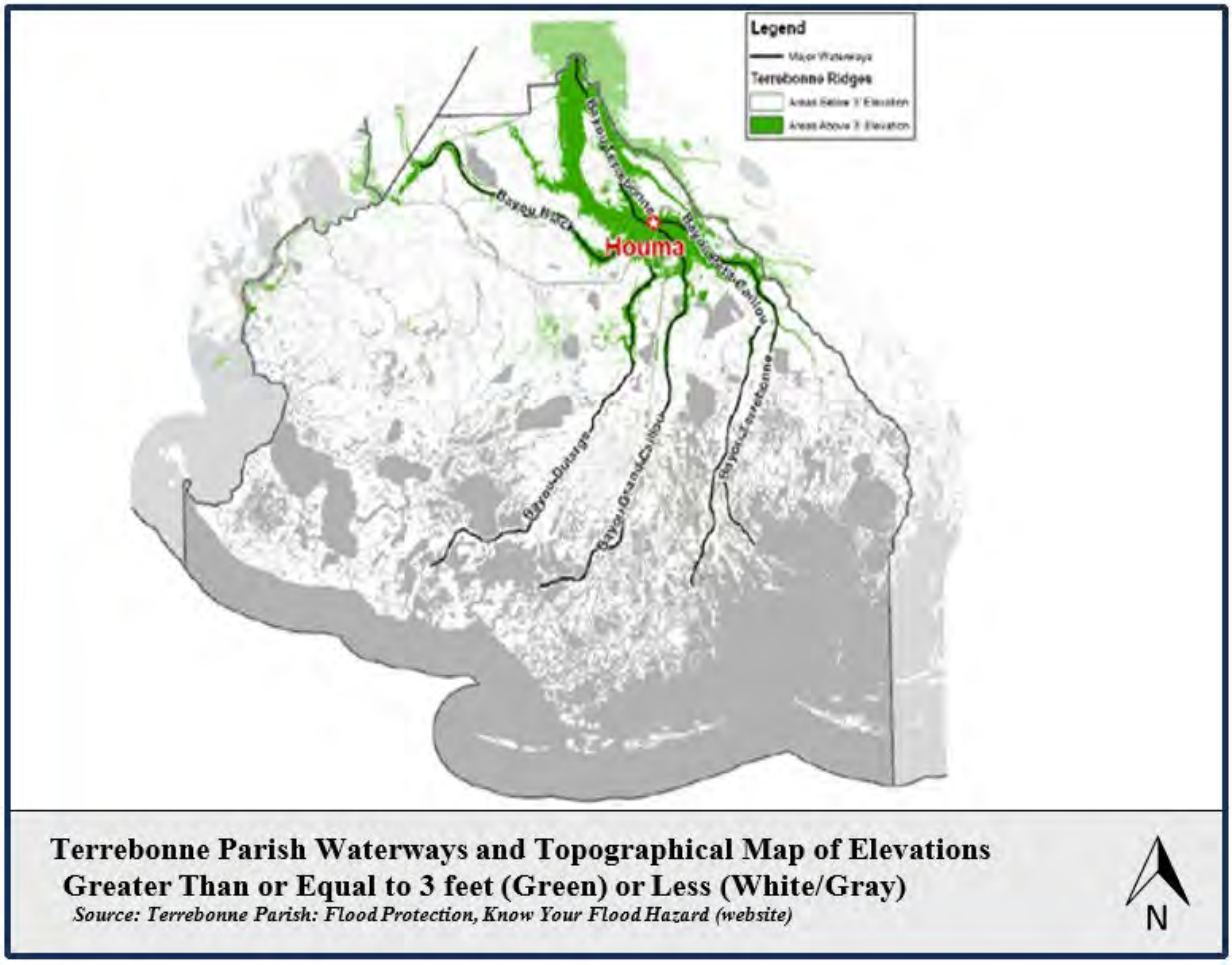

Figure 6 – Terrebonne Parish Topography At, Above, and Below 3 feet ASL

Figure 7 – Proposed STMS Project Area Soils Map (Alternative 3), NRCS 2024

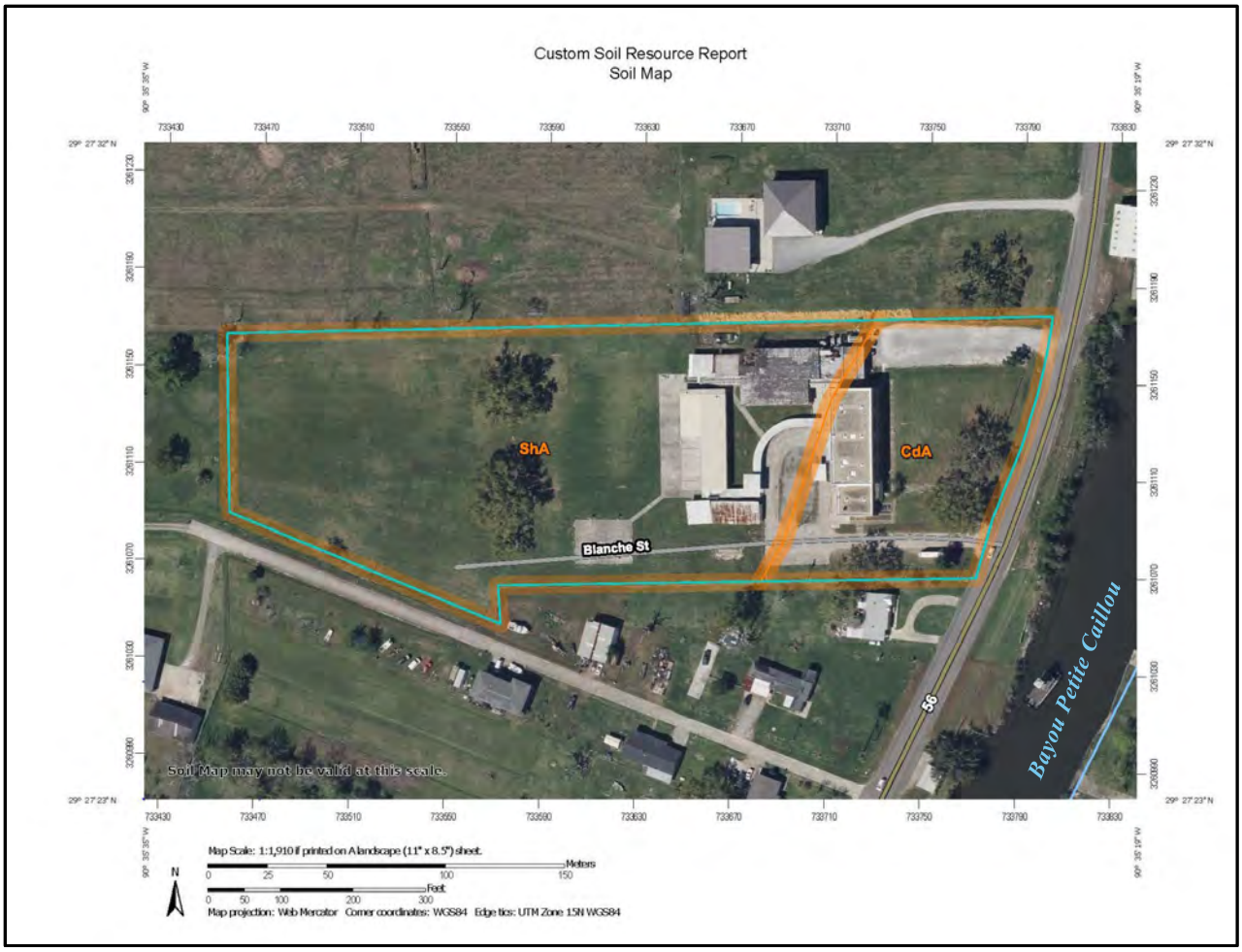

Figure 8 – Soils Map of Lacache Middle School Original Site (Alternative 2), NRCS 2024

4.1.3 Environmental Consequences

Alternative 1: No Action
Under the No Action Alternative, there would be no project-related impacts to farmland subject to the FPPA.

Alternative 2 - Rebuild Lacache Middle School at Original Site
Under Alternative 2, there would be no project-related impacts to farmland subject to the FPPA as Prime Farmland soils are present yet exempt in the project area.

Alternative 3 - Rebuild Lacache Middle School at Alternate Location (Proposed Action)
Under Alternative 3, there would be no project-related impacts to farmland subject to the FPPA as Prime Farmland soils are present yet exempt in the proposed project area, per dated correspondence (August 22, 2024) from NRCS (Appendix 2).

4.2 Land Use and Zoning

4.2.1 Regulatory

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 (CZMA § 307) 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 Coastal Barrier Resource Act

The Coastal Barrier Resources Act (CBRA) of 1982 (16 U.S.C. Ch. 55 §3501 et seq.) and subsequent amendments were enacted to remove the federal incentive to develop designated relatively undeveloped coastal barriers along the Atlantic, Gulf of Mexico, Great Lakes, U.S. Virgin Islands, and Puerto Rico coasts as part of the John H. Chafee Coastal Barrier Resources System (CBRS), and made these areas ineligible for most new federal expenditures and financial assistance. The United States Fish and Wildlife Service (USFWS) regulates federal funding in the CBRS under the CBRA. The purpose of the CBRA is to promote more appropriate use and conservation of coastal barriers along the CBRS.

There are no CBRS units in or near the original Lacache Middle School or the proposed STMS site. The closest CBRS Unit (Unit S07) from the proposed STMS site is approximately 28 miles to the southwest near Point au Fer Island, LA. Therefore, CBRA does not apply.

4.2.1.3 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). All proposed federal projects within the coastal zone must undergo a Consistency Determination by OCM for that project's consistency with the LCRP (LDNR 2024). The CZMA requires each federal agency conducting or supporting activities directly affecting the coastal zone to conduct or support those activities in a manner which is, to the maximum extent practicable, consistent with approved state management programs. Alternatives 2 and 3 would require the application of a CUP due to being a potential federally-funded project within the Louisiana coastal zone.

4.2.1.4 Local Regulatory Framework

Terrebonne Parish regulates land use under Chapter 28 (Zoning) of Terrebonne Parish Code of Ordinances. The proposed, current, and original sites (parcel numbers 42331, 42422, and 42428, respectively) are outside the Urban Services District of Houma and the urban planning district of the Parish, as fully illustrated on the Zoning Map of the Parish of Terrebonne (Terrebonne Parish 2024d) and are therefore un-zoned areas within Terrebonne Parish (Terrebonne Parish, Planning and Zoning Department. Personal communication, 2024).

4.2.2 Existing Conditions

Based on historic aerial imagery, the proposed site land use since 1962 has been in continual agricultural production in the form of grass hay cultivation and pastureland for grazing livestock. Also based on historic aerial imagery, the original Lacache Middle School site has been in continuous educational use since at least 1963. All parcels, 42331, 42422, and 42428, are un-zoned properties listed as Type Exemption and are currently owned by Terrebonne Parish School Board.

4.2.3 Environmental Consequences

Alternative 1: No Action
Under the No Action Alternative, there would be no impacts to the existing land use per Terrebonne Parish Code of Ordinances.

Alternative 2 - Rebuild Lacache Middle School at Original Site
Under Alternative 2, there would be no impacts to the existing land use regulations per Terrebonne Parish Code of Ordinances and would require the application of a Coastal Use Permit.

Alternative 3 - Rebuild Lacache Middle School at Alternate Location (Proposed Action)
Under Alternative 3, there would be no impacts to the existing land use regulations per Terrebonne Parish Code of Ordinances and would require the application of a Coastal Use Permit.

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 (45 FR 59526, Sept. 9, 1980).

4.3.2 Existing Conditions

Terrebonne Parish has an area of 2,067 square miles. Of that total area, 987 square miles (47.8%) are in land and 1,079 square miles (52.2%) are in water (LSU AgCenter). The land areas, in part, are represented by the alluvial formations located on both sides of each of the five main bayous (Bayou Dularge, Bayou Grand Caillou, Bayou Petit Caillou, Bayou Terrebonne, and Bayou Pointe Au Chien), often referred to as ridges, that begin in Houma and emanate southward throughout the parish. These ridges have a minor topography cross-section with elevations often ranging from only five feet to two feet or less. Because these bayou digitations running south from Houma are the only above water land masses in the southern parish, they are the sites of mixed urban utilization and farmland in that area. Areas including Houma and north, for example, Thibodaux, Schriever, and Acadia and the area between Bayou Black and Bayou Terrebonne, represents an upper floodplain terrace where most of the above water area of the parish exists (Figure 11). Elevations in Terrebonne Parish range from approximately 15 ft ABSL in northern Schriever to 0 ft ABSL in most southern areas of the parish where covered by surface waters.

The inland boundary of the Louisiana Coastal Zone was modified in the 2012 Regular Session of the Louisiana Legislature with the passage of House Bill 656 (Act 588) and became effective on June 7, 2012. The boundary change is based on the recommendations of a science-based study conducted for and approved by the Coastal Protection and Restoration Authority (CPRA). The change includes the total inclusion of Terrebonne Parish in the Coastal Zone, where before, there were areas in the northern parish that were not included.

The Parish's hydrological HUC-8 sub-basins include the Atchafalaya (08080101), which represents a small fraction located on the western margin of the parish and West Central Louisiana Coastal (08090302), which represents the majority of the parish's area (Table 2).

Table 2. HUC-8 Sub-Basin Characteristics for Terrebonne Parish

HUC-8 Sub-Basin Name	HUC-8 Sub-Basin Number	Primary Flooding Source	Description of Affected Area	Total Drainage Area (square miles)
Atchafalaya	08080101	Atchafalaya River	Coastal subbasin along the Gulf of Mexico	3,090
West Central Louisiana Coastal	08090302	Gulf of Mexico	Coastal subbasin along the Gulf of Mexico	1,992

Source: FEMA, Flood Insurance Study - Terrebonne Parish, Louisiana (2023).

Additional sources of flooding within the parish include: Gulf of Mexico, Ouiski Bayou, Atchafalaya River, Intracoastal Waterway, Bayou Chauvin, and Bayou Grand Caillou. Both the original facility location and the proposed facility location are within the West Central Louisiana Coastal (HUC-8 08090302) hydrological sub-basin (FEMA 2023). The Ouiski Bayou booster pump, installed by Terrebonne Parish, is a stormwater mitigation facility that moves water downstream at higher velocities.

Terrebonne Parish has an extensive existing flood control network with future plans, in conjunction with Lafourche Parish and the USACE, to increase flood control capacity through the Morganza to the Gulf Hurricane Protection System (MTG). The MTG consists of a network of earthen levees, floodgates, lock complexes, and environmental control structures (Figure 12). The MTG is intended to provide a primary level of flood protection, with a targeted 1% Annual Exceedance Probability (AEP), with other existing flood control elements such as pumps, flood gates, and smaller secondary levee segments strategically located from Schriever, north of Houma, south to Dulac, along the Houma Navigation Canal. Extending from Bayou Dularge in central Terrebonne Parish to Bayou Lafourche in western Lafourche Parish, the

MTG makes a north to south horseshoe configuration encompassing Chauvin in the south to southern Houma in the north (Figure 12). The MTG, once complete, may result in decreased floodplain base flood elevations for all areas within its influence, including the original project area and the proposed project area. The areas of the MTG, that are the responsibility of the USACE, have an approximate construction kick-off date of mid-2028.

The Limit of Moderate Wave Action (LiMWA) is the location where the 1% annual chance wave height equals 1.5 feet. The LiMWA marks the inland limit of the Coastal A Zone, the part of the coastal Special Flood Hazard Area (SFHA) referenced by building codes and standards where wave heights can be between 1.5 and 3 feet during a base flood event. FEMA began showing the LiMWA on Flood Insurance Rate Maps to communicate the higher risk that exists within the LiMWA boundaries. Because the 1.5 ft breaking wave in the LiMWA zone can potentially cause foundation failure, communities are encouraged to adopt building construction standards similar to Zone VE in those areas. The LiMWA limit for the original site encompasses the adjacent Bayou Petite Caillou to the east and bisects the school grounds north to south in the west (Figure 13), the original Lacache Middle School is outside of the LiMWA. Whereas the LiMWA limits at the proposed site are 2 miles to the south and 5 miles to the west and therefore do not encompass the proposed STMS site.

Per the FEMA Flood Insurance Rate Map (FIRM, Panel ID: 22109C0475E), the original Lacache Middle School site is located within a coastal SFHA zone AE with a base flood elevation (BFE) elevation of 12 feet (Figure 13). A coastal AE zone indicates areas that have at least a 1-percent-annual-chance of being flooded and wave heights are less than 3 ft. In addition, for Zone AE, detailed analyses have been performed and BFEs have been calculated. The original property is located outside the limits of LiMWA, as previously detailed, the LiMWA partially bisects the school property to the west and is outside the LiMWA limits to the east (Figure 13).

Per the FEMA FIRM, Panel ID: 22109C0260E, the current temporary site is located in a Shaded X Zone, an area located in the 500-year floodplain and of minimal flood hazard and therefore does not have a stated BFE.

Per the FEMA FIRM, Panel ID: 22109C0260E, the proposed STMS site, northwest and adjacent to the current temporary location at STHS, is located within a coastal SFHA zone AE with a BFE elevation of 7 ft (Figure 14) and is not located within a LiMWA zone. Due to the distance of the LiMWA zone from the temporary location and the proposed school location, the LiMWA is not depicted in Figure 14.

Critical facilities are defined by FEMA as those structures from which essential services and functions for victim survival, continuation of public safety actions, and disaster recovery are performed or provided. Public critical facilities are typically owned and operated by a municipality, county, state, or Tribal Nation government, and are critical to event response and recovery in the community. Examples include: public schools and universities being used as shelters, various public safety related facilities such as police stations, fire stations, 911 call centers, emergency operations centers, public water and wastewater facilities, public hospitals, prisons and correctional facilities, and emergency medical service facilities. Terrebonne Parish lists the following as critical facilities: hospitals, assisted living, home health, medical, emergency operations centers, police stations, fire stations, schools, housing authority buildings, childcare, civic center, utilities, government buildings, sewage utility, and water utility (Terrebonne Parish 2023a). Terrebonne Parish ranks schools as Tier 1 critical facilities. These are defined as, “entities that provide for the basic life safety and function of the Parish before, during and after an event; and buildings managed by government agencies.” (Terrebonne Parish 2023a). On August 1, 2023, the State of Louisiana’s building code began requiring 1 additional foot (2 additional feet for critical facilities) of elevation above the FEMA BFE requirement (Terrebonne Parish 2023b). Terrebonne Parish Consolidated Government requires that all new construction, substantial damage/improvement and elevations raise to the September 7, 2023, DFIRM plus

1 ft freeboard for most and 2 ft freeboard for critical facilities. Projects receiving federal funding are often required to build to the DFIRM +2 ft (Terrebonne Parish 2024c).

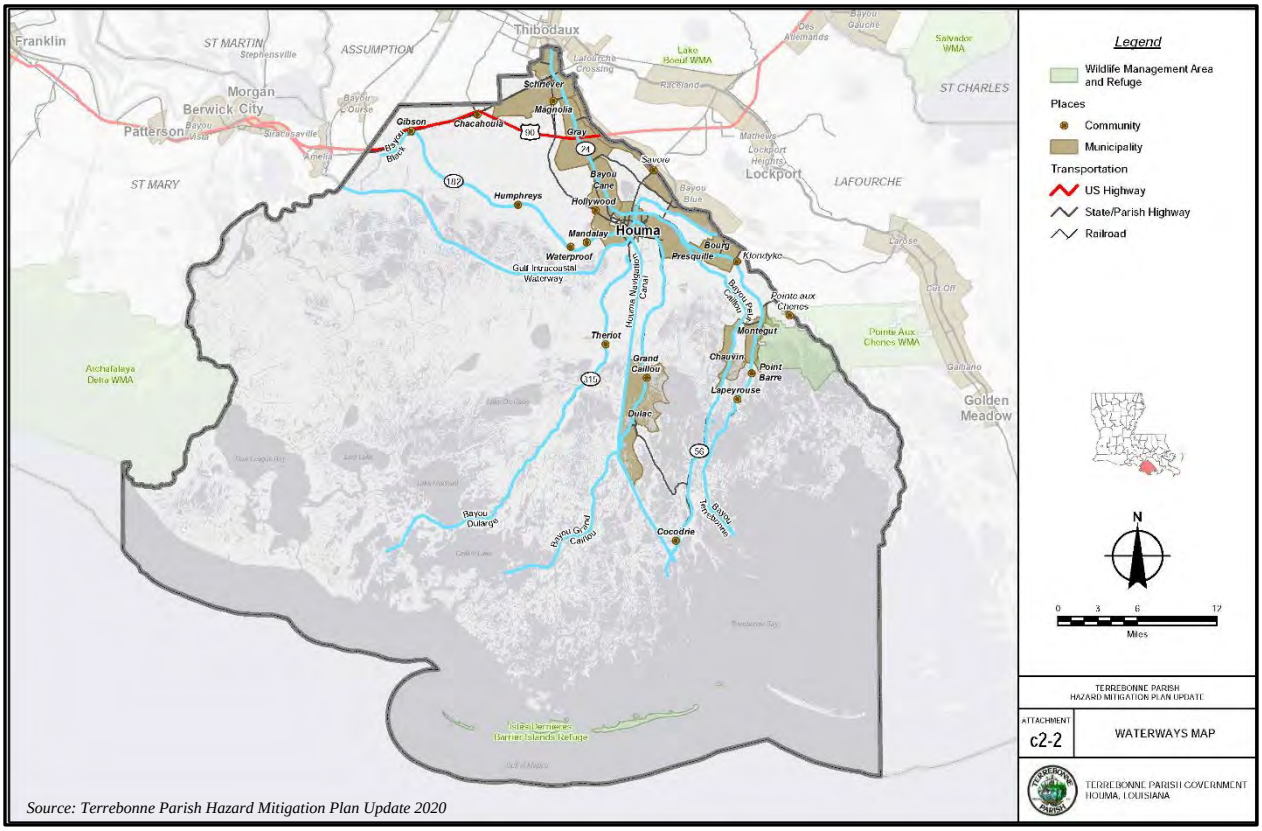

Figure 9 – Major Drainages in Terrebonne Parish

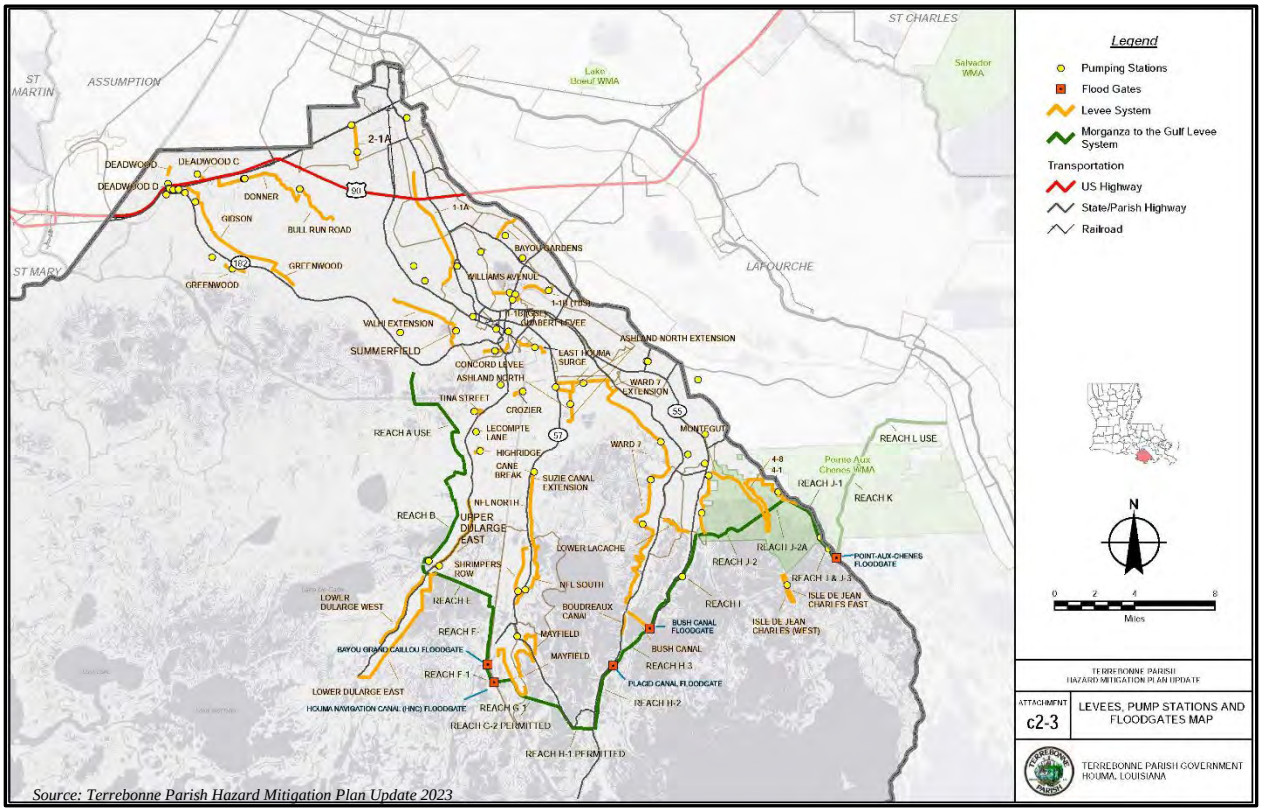

Figure 10 –Terrebonne Parish Flood Control Network

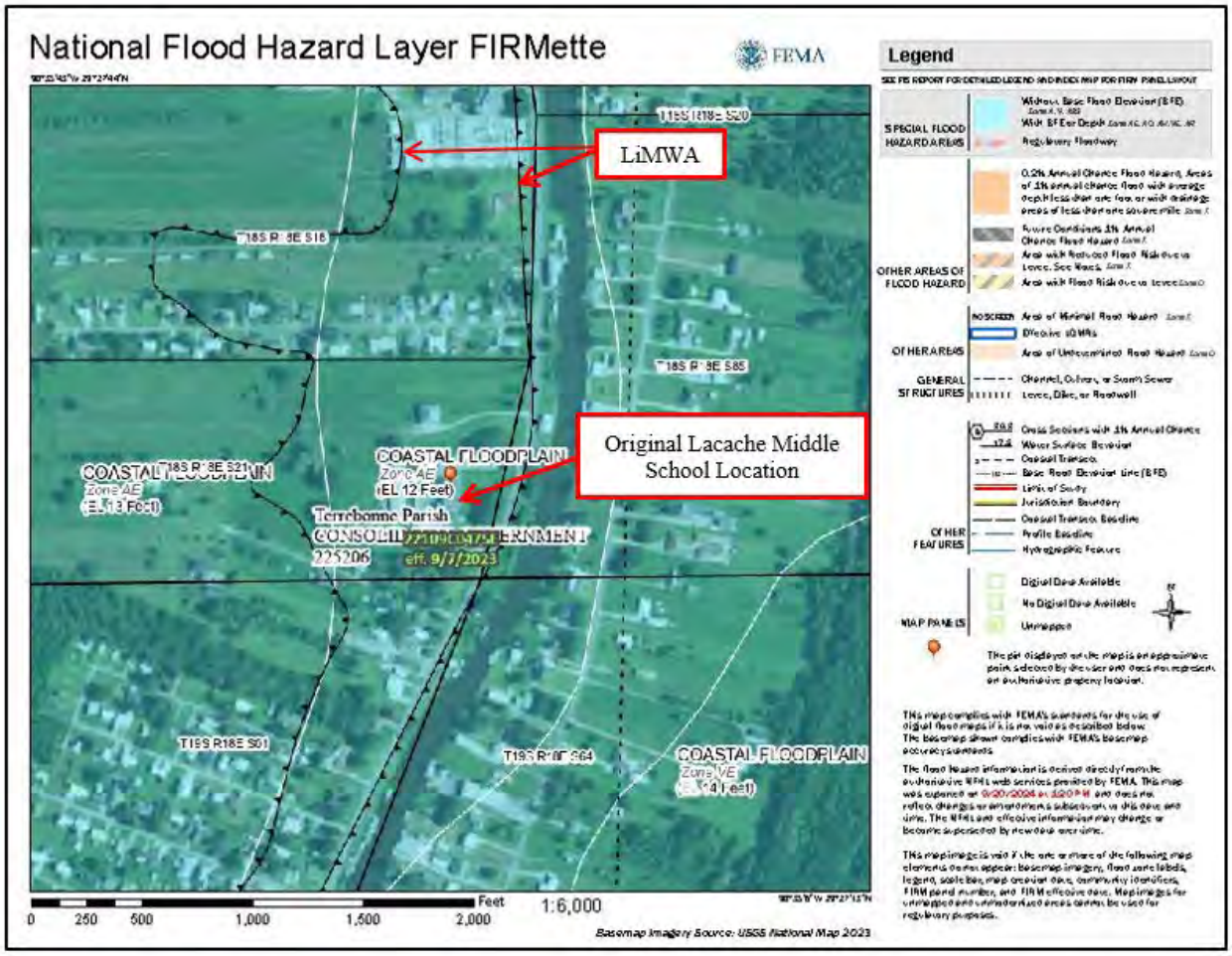

Figure 11 – FEMA Flood Insurance Rate Map for Original Lacache Middle School Location (Alternative 2)

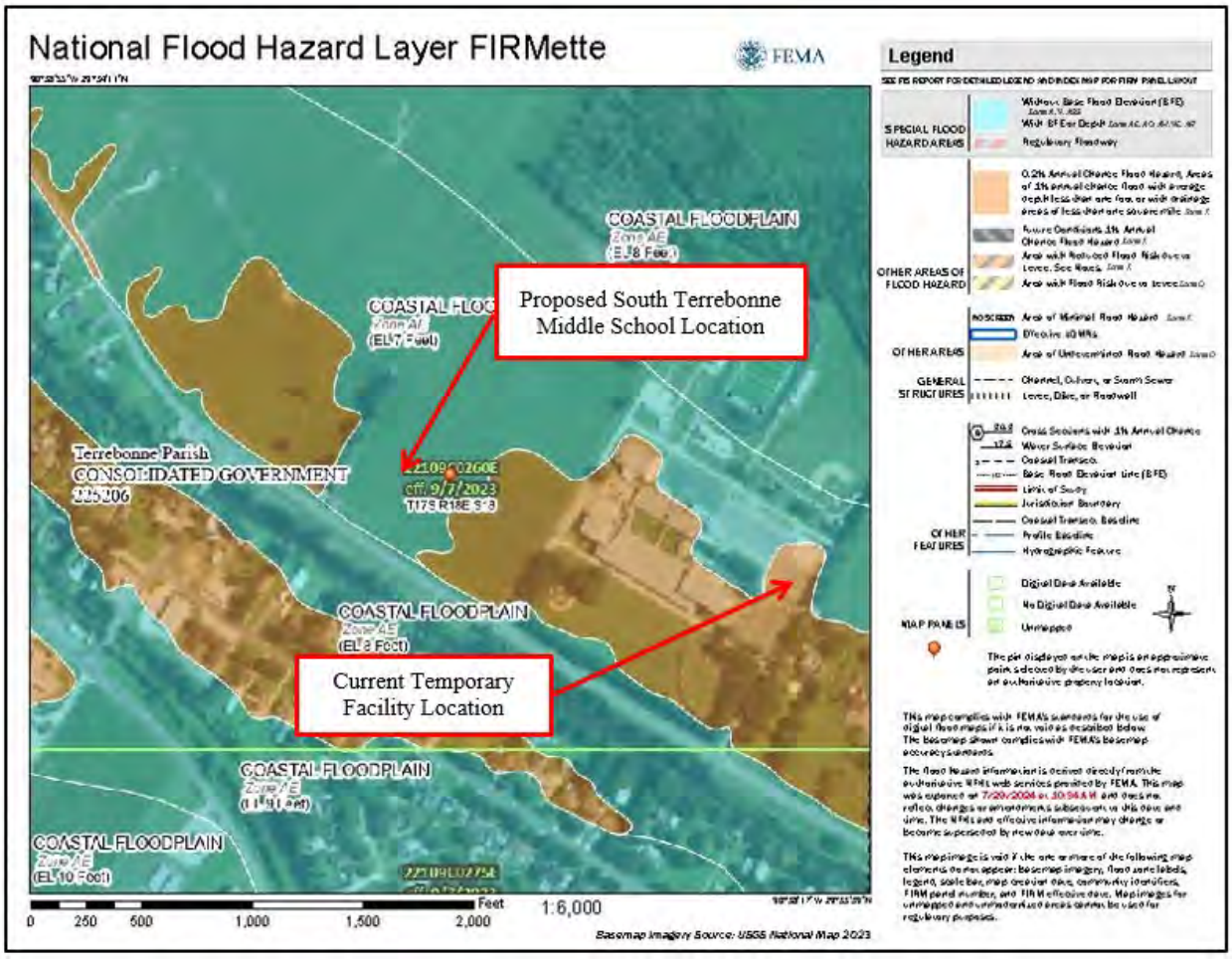

Figure 12 – FEMA Flood Insurance Rate Map for Current Location (Alternative 1) and the Proposed South Terrebonne Middle School Location (Alternative 3)

4.3.3 Environmental Consequences

Alternative 1: No Action

Under the No Action Alternative, the temporary classroom facilities located in the east parking lot of STHS would remain in place. The temporary classrooms are located outside of the SFHA and within a Shaded X Zone indicating a 0.2% annual chance of flooding, also known as the 500-year floodplain (Figure 14). There would be no anticipated impacts to the 500-year floodplain with a no-action decision.

Alternative 2 - Rebuild Lacache Middle School at Original Site

Under Alternative 2, demolition and reconstruction of the middle school at the original Lacache Middle School site would require elevating a new school facility to an elevation of 14 ft which (+2 ft above BFE [12 ft] for Critical Facilities) would be 9 ft above ground level. Reconstruction at the original site, providing the facility was elevated on piles without the addition of fill below the first floor, would not have an anticipated impact on the surrounding floodplain. However, the surrounding floodplain as detailed with the building requirements of a critical facility in an AE Zone with a BFE +2 elevation of 14 ft, would include

floodplain construction requirements and construction costs. The Alternative 2 facility would be elevated above grade on piles within open-air construction between grade and first floor elevation. This open area would be utilized for parking and storage only. There would be no anticipated impacts to the 100-year floodplain with under Alternative 2.

Alternative 3 - Rebuild Lacache Middle School at Alternate Location (Proposed Action)

Under Alternative 3, reconstruction at an alternate location, the proposed alternative, named as the STMS, per current proposed design, would occupy an AE flood zone with a BFE of 7 ft. Therefore, for a critical facility with a BFE +2 ft building requirement, the first-floor elevation requirement would be 9 ft. The Alternative 3 facility would require design and construction to V-zone standards due to its Coastal A designation in accordance with ASCE 24-14, Flood Resistant Design and Construction, or latest edition. TPSD would be required to coordinate with the local floodplain administrator to obtain required permits prior to initiating work and comply with any conditions of the permit to ensure harm to the floodplain is minimized. Under Alternative 3, there would be minor impacts to the 100-year floodplain by the addition of fill material and hardened surfaces in place of permeable surfaces. An 8-Step analysis for the construction in the AE Zone at the Proposed Action site is provided in Appendix 3.

4.4 Waters of the United States and Wetlands

4.4.1 Regulatory

4.4.1.1 Clean Water Act § 303

Section 303(d) of the federal Clean Water Act (CWA) requires states to develop a list of impaired waters. A water is considered impaired if the current water quality does not meet the numeric or narrative criteria in a water quality standard or the designated use that is described by that state is not achieved. Section 303(d)(2) requires that States submit and USEPA approve or disapprove lists of waters for which existing technology-based pollution controls are not stringent enough to attain or maintain state water quality standards and for which total maximum daily loads (TMDLs) must be prepared (40 CFR 130.7). Total maximum daily loads are pollution budgets designed to identify necessary reductions of pollutant loads to the impaired waters so that the appropriate water quality standards are met, including designated uses like fishing or swimming and water quality criteria for parameters such as dissolved oxygen and water clarity (EPA 2012). The regulations require states to identify water quality limited waters still requiring TMDLs every two years. The lists of waters still needing TMDLs must also include priority rankings and must identify the waters targeted for TMDL development during the next two years (40 CFR 130.7). Types of impairments may include, for example, impairing primary contact use (e.g., swimming, water skiing), mercury and polychlorinated biphenyls (PCBs) in fish tissue, impairing fish consumption use, low dissolved oxygen, copper, phosphorus, manganese, excessive siltation, physical-habitat alterations, and total suspended solids which impair aquatic life use.

4.4.1.2 Clean Water Act § 401

Section 401 of the CWA requires the state certification of all federal licenses and permits in which there is a “discharge of fill material into navigable waters.” The certification is used to determine whether an activity, as described in the federal license or permit, will impact established site-specific water quality standards. A water quality certification from the issuing state is required prior to the issuance of all federal licenses or permits. The most common federal license or permit requiring certification is the U.S. Army Corps of Engineers (USACE) CWA § 404 permit.

4.4.1.3 Clean Water Act § 402

The National Pollutant Discharge Elimination System (NPDES) program was created under Section 402 of the CWA in 1987. This program authorizes the USEPA to issue permits for the point source discharge of pollutants into the waters of the United States. The state of Louisiana was authorized to administer the NPDES program on August 27, 1996, and administers it as the Louisiana Pollutant Discharge Elimination System (LPDES) program. As cited in the Memorandum of Agreement (MOA) executed between both parties effective August 27, 1996, and modified on August 2, 2000, USEPA is responsible for assuring that Louisiana's discharge permitting program is consistent with all federal regulations and laws and that it adheres to the requirements agreed upon in the MOA. The LDEQ has primary responsibility for implementing the LPDES program in Louisiana in accordance with sections 301, 302, 303, 306, 307, 308, 402, 403, and 405 of the Federal CWA, 33 United States Code (U.S.C.) section 1251, *et seq*., applicable State legal authority, the applicable requirements of 40 CFR parts 122-125 and any other applicable federal regulations, the Multi-Media/Multi-Year Enforcement MOU, and the annual program grant. The LPDES program applies to individual permits, general permits, stormwater permits, and pretreatment activities. Having assumed NPDES responsibilities, Louisiana Department of Environmental Quality (LDEQ) directly issues NPDES permits and has primary enforcement responsibility for facilities located within Louisiana, with certain exceptions such as Tribal Lands. The 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.

4.4.1.4 Clean Water Act § 404

For the post Sackett decision, pre-2015 regulatory definition of "waters of the United States (WOUS)", currently in use by Louisiana and twenty-six (26) other states, waters of the United States are defined by "40 CFR 230.3(s) The term waters of the United States means:

1. All waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide;
2. All interstate waters including interstate wetlands;
3. All other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds, the use, degradation or destruction of which could affect interstate or foreign commerce including any such waters:
    a. Which are or could be used by interstate or foreign travelers for recreational or other purposes; or
    b. From which fish or shellfish are or could be taken and sold in interstate or foreign commerce; or
    c. Which are used or could be used for industrial purposes by industries in interstate commerce;
4. All impoundments of waters otherwise defined as waters of the United States under this definition;
5. Tributaries of waters identified in paragraphs (s)(1) through (4) of this section;
6. The territorial sea;
7. Wetlands adjacent to waters (other than waters that are themselves wetlands) identified in paragraphs (s)(1) through (6) of this section; waste treatment systems, including treatment ponds

or lagoons designed to meet the requirements of CWA (other than cooling ponds as defined in 40 CFR 423.11(m) which also meet the criteria of this definition) are not waters of the United States.

Waters of the United States do not include prior converted cropland. Notwithstanding the determination of an area's status as prior converted cropland by any other federal agency, for the purposes of the CWA, the final authority regarding CWA jurisdiction remains with USEPA. (40 CFR 230.3(s)).”

Wetlands are identified as those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions (40 CFR 122.2).

4.4.1.5 Executive Order 11990 – Protection of Wetlands

Executive Order (EO) 11990, Protection of Wetlands, directs federal agencies to minimize the destruction, loss, or degradation of wetlands and to preserve and enhance the values of wetlands for federally funded projects. FEMA regulations for complying with EO 11990 are found at 44 CFR Part 9, Floodplain Management and Protection of Wetlands.

4.4.2 Existing Conditions

The Lacache Middle School original facility site is a nearly flat 8.43 acre site with no WOUS within the property area. The only WOUS within 200 LF of the property area is Bayou Petite Caillou located on the east side of State Highway 56 (Little Caillou Rd. [Figure 10]).

The proposed STMS site is a nearly flat 13.5 acre site with bordering NWI mapped wetlands on the south and west property margins (Figure 11). Bayou Terrebonne is located on the south side of Highway 56, and there is an ephemeral drainage (Riverine habitat [R4SBC]) running the full length of the proposed project's western margin. There are no known waters or wetlands within the proposed property area.

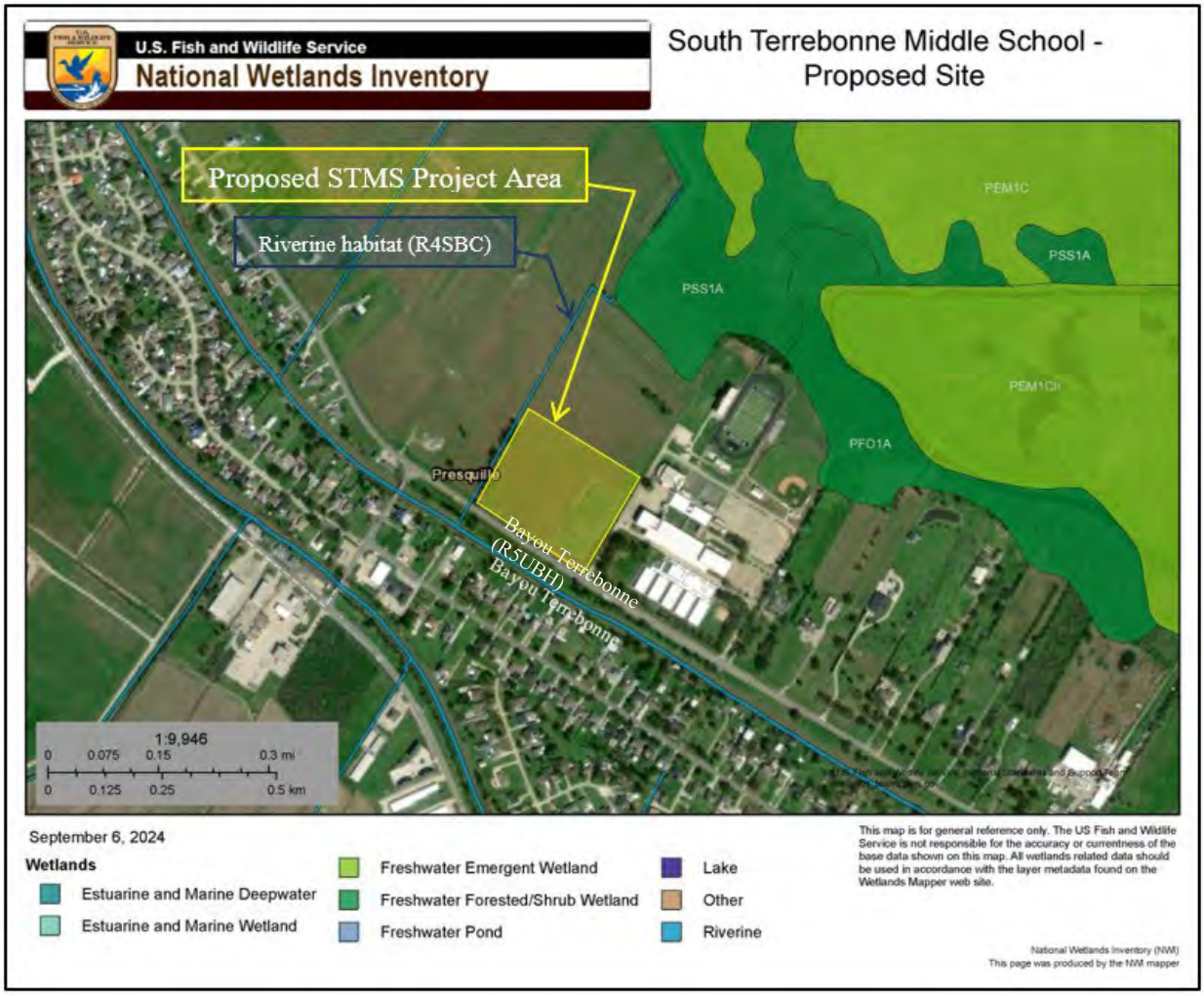

Figure 13 – NWI Map for South Terrebonne Middle School Proposed Site (Alternative 3)

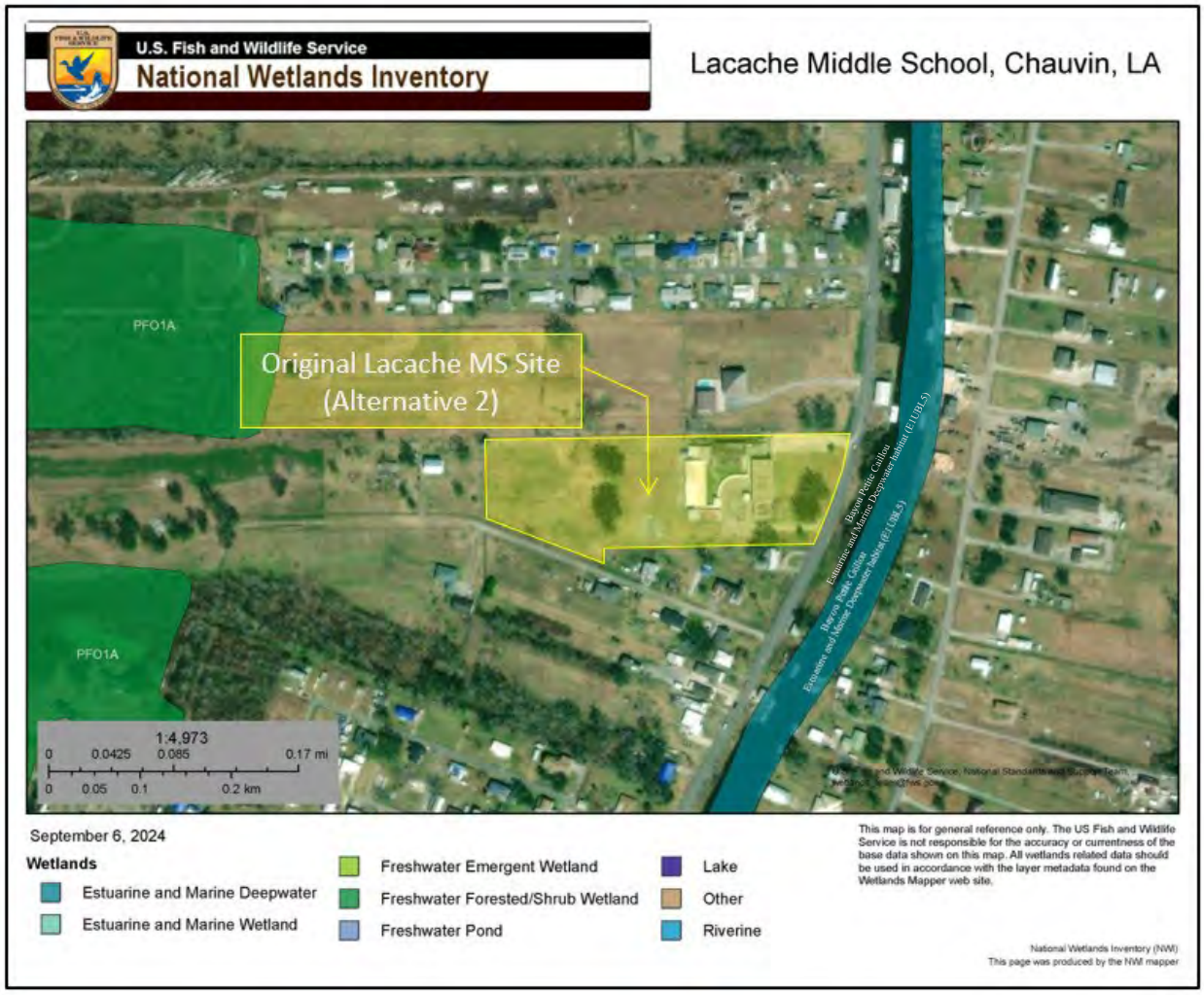

Figure 14 – NWI Map for Lacache Middle School Original Site (Alternative 2)

4.4.3 Environmental Consequences

Alternative 1: No Action
Under the No Action Alternative, there would be no project-related impacts to waters of the United States.

Alternative 2 - Rebuild Lacache Middle School at Original Site
Under Alternative 2, because there are no WOUS in or closely adjacent to the original location, there would be no project-related impacts to WOUS.

Alternative 3 - Rebuild Lacache Middle School at Alternate Location (Proposed Action)
Under Alternative 3, with project pre-construction avoidance plans, including architectural plans that avoid adjacent potential WOUS, there would be no project-related impacts to WOUS.

4.5 Water Quality and Resources

4.5.1 Regulatory Setting

4.5.1.1 Section 402 of the Clean Water Act

The National Pollution Discharge Elimination System (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 MOA, the USEPA delegated its permit program to the State of Louisiana to the 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 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 of the State of Louisiana are subject to an LPDES permit issued by LDEQ. Pursuant to the CWA, as amended (33 U.S.C. 1251 *et seq*.), and the Louisiana Environmental Quality Act, as amended (La. R. S. 30:2001 *et seq*.), the LPDES General Permit (LAR100000) authorizes operators of storm water discharges from construction activities of five (5) acres or more, including smaller areas that are part of a larger plan of development or sale that cumulatively disturb at least five acres, and defined dedicated support activities, to discharge to waters of the State, in accordance with the conditions and requirements in Permit LAR100000 (LDEQ 2024a). Storm Water Prevention Pollution Plans (SWPPP) and Best Management Practices (BMPs) are water quality control requirements of a LPDES General Permit. SWPPPs and BMPs are both methods intended to limit site erosion and impacts to surface waters during and after construction.

Construction of a new facility at the proposed, Alternative 3, site would impact more than 5 acres and therefore would require a LPDES general permit (LAR100000) prior to any ground disturbance. With a useable area of approximately 8.4 acres at the original Lacache Middle School location and the comparative area from the architectural plans submitted for the proposed site, it is likely the rebuilding at the original site, Alternative 2, would also be more than 5 acres and would also require a LPDES General Permit (LAR100000) prior to any ground disturbance.

4.5.1.2 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).

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. There are no SSA's in or near the original, current or proposed project sites.

4.5.2 Existing Conditions

The proposed Alternative 3 project area is a former agricultural pasture bordered by a highway to the south and drainage ditches on the west and south of the proposed project area. The Alternative site 2 area consists of a series of educational buildings and open land to the west. The Alternative site 1 area consists of a series of educational buildings and open land to the north. Water resources in the alternative project areas include both groundwater and surface water. Groundwater within the alternative areas is not contained within an EPA Sole Source Aquifer (USEPA 2024a).

4.5.3 Environmental Consequences

Alternative 1 - No Action Alternative

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

Alternative 2 - Rebuild Lacache Middle School at Original Site

The proposed Alternative 2 project area is topographically isolated from surface waters as the Lacache Middle School is approximately 1 foot lower than Little Caillou Road that separates the alternative project area from Bayou Petite Caillou located to the east of the adjacent roadway. Storm drains and culverts located within the Alternative 2 site would be protected with appropriate BMPs (*e.g.*, filter fabric, straw wattles) to limit sediment from entering the adjacent bayou as part of the required LPDES General Permit requirements. With appropriate mitigation measures, as contained in a LPDES General Permit, Alternative 2 would have no effect on water quality.

Alternative 3 - Rebuild Lacache Middle School at Alternate Location (Proposed Action)

The proposed Alternative 3 project area is separated from the adjacent Bayou Terrebonne to the southwest by a shallow drainage ditch and State Highway 24. One culvert and an associated long wetted channel with a narrow woody riparian tree line exists in the west-southwest property corner that could, if not mitigated, carry construction derived sediment to the bayou. With onsite stormwater mitigation measures that protect the wetted riparian ditch and roadside ditch as required by a LPDES General Permit, Alternative 3 would have no effect on water quality.

4.6 Biological Resources

4.6.1 Regulatory Setting

4.6.1.1 Endangered Species Act

The Endangered Species Act of 1973 (ESA [16 U.S.C. 1531-1544; 87 Stat. 884]) prohibits the taking of listed, threatened, and endangered species unless specifically authorized by permit from the USFWS or the National Marine Fisheries Service (NMFS). "Take" is defined in 16 U.S.C. 1532 (19) as "*to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect or attempt to engage in any such conduct.*" Harm is further defined to include significant habitat modification or degradation that results in death or injury to listed species by significantly impairing behavioral patterns such as breeding, feeding, or sheltering (50 CFR 17.3).

Section 7 (a)(2) of the ESA requires the lead federal government agency to consult with either the USFWS or the NMFS, depending which agency has jurisdiction over the federally listed species in question, when

a federally funded project 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. The lead agency will consult with the USFWS or the NMFS or both (Services) as appropriate and will determine if a biological assessment (BA) is necessary to identify potential adverse effects to federally listed species, their critical habitat or both. If a BA is required, it will be followed by a biological opinion from the Agencies depending on the jurisdiction of the federally listed species identified in the BA. If impacts of a proposed federal project are considered negligible to federally listed species, the lead agency may instead prepare a concurrence letter to the Agencies with a "*May Affect, but Not Likely to Adversely Affect*" determination requesting that agency's concurrence. This EA serves to identify potential impacts and meet the ESA, Section 7, requirement by identifying risks of the proposed action alternatives to known federally listed species and their critical habitat and by providing a means for consultation with the Agencies.

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 involve 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 waters of the United States. The MSA created eight regional fishery management councils to manage fisheries and promote conservation. The MSA focuses on rebuilding overfished fisheries and protecting Essential Fish Habitat (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 proposed Alternative 3 project area is largely undeveloped pastureland that was historically used for agricultural purposes (hay production and cattle grazing). This area has been in agricultural production since at least 1963 and therefore has had a consistent disturbance regime for over 60 years. Remnants of natural habitats occur on the west-southwest property margin where a tree line follows a wetted ditch from Highway 24 to the northeast for approximately 580 linear feet. The dominant tree species are water oak (*Quercus nigra*), pecan (*Carya illinoinensis*) and black willow (*Salix nigra*). A small (86 ft x 30 ft) wetland area occurs at the intersection of Hwy 24 and the southwest corner of the project area. Dominant vegetation includes two emergent wetland species, broadleaf cattail (*Typha latifolia*) and the non-native coco yam (*Colocasia esculenta*). Plant species within the pasture area are all believed to be, based on current and historic land use, grass cultivars. The right-of-way margin between the property fence line and Hwy 24 has several non-native and native ruderal species including but not limited to, barley (*Hordeum sp*.), curly doc (*Rumex crispus*), hairy buttercup (*Ranunculus sardous*), largeflower baby blue eyes (*Nemophila phacelioides*) and elderberry (*Sambucus nigra*).

4.6.2.2 Protected Species

The trees along the southwestern property margin are of sufficient height (~65 feet) and have limbs that could support a platform style nest used by Bald Eagles (*Haliaeetus leucocephalus*) and are also suitable for medium-sized birds of prey and smaller passerine bird species. Potential foraging habitat for Bald Eagles represented as open-water wetland areas are as close as 2,000 feet from the tree line to the northeast and east of the project area. Bayou Terrebonne located southwest of Hwy 24 is also a potential foraging habitat area but of lesser overall quality than the wetlands to the north. Based on a survey of local eBird survey data (eBird 2024), Bald Eagles are a relatively common occurrence in the vicinity of the proposed project area. It is likely that the tree line on the western property line would be used for perching habitat by Bald Eagles; however, there are no reports nor is there any visual evidence of nesting Bald Eagles or remnant platform type nests in these trees or trees in the greater action area. There are also no observable nest structures of any size in the western tree line of the proposed Alternative 3 project area.

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 07, 2024, the

proposed Alternative 2 and 3 project areas could potentially have an occurrence of 4 threatened, endangered, or candidate species. Among these species, West Indian Manatee (*Trichechus manatus*) is federally listed as Threatened, while the Tricolored Bat (*Perimyotis subflavus*) holds a status of Proposed Endangered. 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 (Appendix 4. U.S. Fish & Wildlife Service Consultation Letter, Species List Louisiana Ecological Services Field Office, and NE Consistency Letter). No critical habitat has been identified for any listed species within the Alternative 1, 2, or 3 project areas. See Table 3 for listing status, habitat requirements, and effect determination for each species identified in the IPaC resource list for the proposed project site.

In response to the SOV letter, the Louisiana Wildlife Diversity Program (WDP) indicated that in their database records search no impacts to rare, threatened, or endangered species or critical habitats are anticipated for the proposed project and no state wildlife refuges or wildlife management areas are known to occur at the STMS site (Appendix 5. Louisiana Wildlife Diversity Program, Response to SOV Letter for the South Terrebonne Middle School, FEMA Public Assistance Program, FEMA-DR-4611-LA).

Table 3. Federally Proposed, Candidate, Threatened or Endangered Species with Potential to Occur in the Proposed Project Action Area

Common Name	Scientific Name	Federal Status†	Critical Habitat	Agency Jurisdiction (FEMA)	Habitat Requirements	Determination‡ / Rationale
Mammals						
West Indian Manatee	*Trichechus manatus*	Threatened / Strategic Stock (MMPA)2	Yes[1]	USFWS	Found in marine, estuarine, and freshwater environments with a strong preference for warm and well vegetated waters.	No Effect / Project will not include any near or in-water work.
Tricolored Bat	*Perimyotis subflavus*	Proposed Endangered	No	USFWS	During winter found in caves, abandoned mines, and culverts. From spring to fall, found in forested habitats roosting in deciduous hardwood trees, may also be found in Spanish moss, pine trees, and occasionally human structures.	Not Likely to Adversely Affect / Potential habitat exists in western tree line. Disturbance would be limited to noise during construction phase.
Birds						
Bald Eagle	*Haliaetus leucocephalus*	BGEPA & MBTA	No	USFWS	Habitat generally includes coastal marine, rivers, lakes, wetlands, and marsh habitats where large trees are in vicinity for roosting and nesting habitat.	No Effect / No evidence of nest structures in action area. Only perching habitat available in project area. Project area does not provide suitable foraging habitat.
Reptiles						
Alligator Snapping Turtle	*Macrochelys temminckii*	Proposed Threatened	No	USFWS	Inhabits primarily deep rivers with steep banks, but also lakes, swamps, bayous, ponds near rivers, and shallow creeks that are tributary to occupied rivers.	No Effect / Project will not encroach upon existing riparian and ponded wetland habitat in western project tree line.
Insects						
Monarch Butterfly	*Danaus plexippus*	Candidate	No	USFWS	A range of habitats with flowering plants and specific host plants (*Asclepias sp.*) for larval development.	No Effect / Project will not encroach upon existing riparian and ponded wetland habitat in western project tree line. Project pasture area is limited to grass (Poaceae) species and does not contain flowering forbs.

† ESA status designations in Table 3 are relevant to Louisiana only; ESA listing status may be different elsewhere.
‡ Endangered Species Act - Project Effect Determination Proposed by FEMA.
1 Critical Habitat is not designated in Louisiana.
2 Marine Mammal Protection Act of 1972 (MMPA) Stock Assessment
BGEPA - Bald and Golden Eagle Protection Act
MBTA - Migratory Bird Treaty Act

4.6.3 Environmental Consequences

Alternative 1 - No Action Alternative

Currently, students at Lacache Middle School are in temporary facilities located in a parking lot at STHS, 3879 LA-24, Bourg, LA 70343. This temporary campus does not have the potential to directly or indirectly effect listed or otherwise sensitive species.

Alternative 2 - Rebuild Lacache Middle School at Original Site

Rebuilding at the original Lacache Middle School site would not have the potential to directly or indirectly effect listed or otherwise sensitive species. There is no potential habitat for listed terrestrial or avian species in or near the site west of Bayou Petite Caillou. There would be no need for near or in-water work at this site and therefore no impacts (No Effect) would occur to aquatic species, including West Indian Manatee and the Alligator Snapping Turtle. Medium-sized oak trees (*Quercus sp*.) do occur on site; however, they are not large enough to accommodate large birds like a Bald Eagle, and the disturbance regime is great enough to exclude sensitive migratory birds such as medium-sized birds of prey like the Red-Shouldered Hawk (*Buteo lateralis*).

Alternative 3 - Rebuild Lacache Middle School at Alternate Location (Proposed Action)

The proposed Alternative 3 project area consists of a large managed pasture area bordered to the west by a mixed species tree line and a small associated wetland area, to the east by STHS, to the north by managed pasture, and to the south by Hwy 24. This proposed project action at this site would have no effect on the federally threatened West Indian Manatee since there would be no near or in-water work associated with the project. As the proposed project would not directly affect the tree line habitat area to the west, there would be no direct effect to federal candidate, and proposed threatened or endangered species (Table 3). The western tree line does offer minimal, but suitable habitat, for the Tricolored Bat. As bats in general are known to have little tolerance to disturbance, construction activities could disturb this species if present. Pre-construction presence / absence bat surveys could be conducted to determine if bats were present and their species. Bald Eagles have been well documented in the action area and outlining areas near the proposed project. However, there is no available documentation indicating the trees in the action area have ever been utilized as Bald Eagle nest trees. The larger oak and pecan trees on site could be used as perching habitat, but such utilization is ephemeral and would not be considered a substantial disruption in behavior if a Bald Eagle was disturbed from a perch due to construction activities. 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 from USFWS dated October 07, 2024 (See Appendix 4. U.S. Fish & Wildlife Service Consultation Letter, Species List Louisiana Ecological Services Field Office, and NE Consistency Letter Louisiana Endangered Species Act) the USFWS has concurred that there would be “no effect” to West Indian Manatee per the project location and proposed actions.

4.7 Cultural Resources

4.7.1 Regulatory

The consideration of impacts on historic and cultural resources is mandated under NEPA § 101(b)(4) 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.

To address the potential impacts of federally funded undertakings on cultural or historic resources, FEMA, along with participating agencies and Tribal entities, enacted the *Programmatic Agreement among the Federal Emergency Management Agency, the Louisiana State Historic Preservation Officer, the Governor's Office of Homeland Security and Emergency Preparedness, and Participating Tribes, on March 11, 2024* (2024 Statewide PA).

The Section 106 process outlined in the 2024 Statewide PA 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 NHPA § 101(a)(1)(A), 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

FEMA Historic Preservation Specialists reviewed the Louisiana Office of Cultural Development's Cultural Resources National Register Database, the Louisiana Cultural Resources Map and associated site files (LDOA website), various digital archival resources, photos, and historic maps to identify the presence of historic properties within the Lacache Middle School Campus (29.45775, -90.59010). Background research indicates the existing location of the campus is not within a National Register Historic District (NRHD), and there are no individually listed National Register Properties within or adjacent to the campus. The existing school was constructed ca. 1960. There are no previously recorded archaeological properties within the boundaries of or within close proximity to the school campus. Soils on the campus are composed of Schriever clays, which indicate former backswamp environments, and Cancienne silty clay loam, reflecting a setting on the natural levee of Bayou Petit Caillou. The existing Lacache Middle School campus has a moderate to high probability for the presence of archaeological deposits, but the property has not been surveyed for cultural resources.

4.7.3 Environmental Consequences

Alternative 1: No Action

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

Alternative 2 - Rebuild Lacache Middle School at Original Site

Demolition and reconstruction activities on the existing campus would require Section 106 consultation with interested parties. The school buildings have reached sufficient age as to require a NRHP eligibility assessment. Because of the high probability for archaeological deposits, any ground disturbing activities proposed to take place outside the footprint of the current structure would require assessment as well.

Alternative 3 - Rebuild Lacache Middle School at Alternate Location (Proposed Action)

The Area of Potential Effect (APE) for the Alternative 3 is the entirety of the 30-acre proposed alternate site adjacent to the STHS. This APE is inclusive of all areas of potential ground disturbance within the perimeter of the proposed site which will consist of land clearing, grubbing, leveling, building construction, and the installation of utilities, sidewalks, parking areas, athletic fields, and associated infrastructure.

Background research indicates there are no structures within the APE, nor is the APE within a NRHD. Additionally, there are no individually listed National Register Properties within or adjacent to the project area. The area has remained largely undeveloped, primarily used as cropland until 2010, after which it has been maintained as an open, cleared field.

In August 2024, R. Christopher Goodwin and Associates, Inc. (RCGA) conducted a Phase I Cultural Resources Survey of the APE. A total of 152 shovel tests were excavated within the APE, of which none were positive for cultural material. No evidence of historic resources were identified as a result of this intensive shovel testing regimen.

FEMA initiated consultation with SHPO and the Coushatta Tribe of Louisiana, Eastern Shawnee Tribe of Oklahoma, Jena Band of Choctaw Indians, Mississippi Band of Choctaw Indians, Tunica-Biloxi Tribe of Louisiana (Tribes) on October 1, 2024. In addition to the consultation letter, FEMA provided RCGA's Cultural Resources Report (Report # 22-7661) for review. FEMA determined a finding of No Historic Properties Affected for Alternative 3. SHPO concurred with FEMA's determination on 10/30/2024 (Appendix 6). No comments were received from the Tribes. FEMA has determined that the proposed project will not adversely affect traditional, religious, or culturally significant sites and concluded the Section 106 review for Alternative 3.

4.8 Environmental Justice

4.8.1 Regulatory Setting

Executive Order (E.O.) 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, was signed in 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 minority or low-income persons. Information obtained from the U.S. Census Bureau was compiled and extrapolated by the USEPA. The USEPA's Environmental Justice Screening and Mapping tool (EJSCREEN [USEPA 2024b]) was used to investigate the presence of readily identifiable low-income or minority populations within a 1-mile buffer of the proposed project area.

EJSCREEN is an EJ mapping and screening tool developed by the USEPA to create a national dataset and approach combining environmental and demographic indicators. EJSCREEN provides these indicators for every census block group in the country. Though EJSCREEN includes multiple "Socioeconomic Indicators," the two of interest for this evaluation are People of Color and Low Income. For the purposes of this analysis, a minority and/or low-income population exists if People of Color and/or Low-Income equals or exceeds the 50th percentile compared to the state average where the affected environment is located. This means that the minority and/or low-income population as defined by EJSCREEN exceeds the statewide average. For this screening analysis, the statewide average is the threshold for identifying a minority or low-income community. The data indicates that the population is composed of 92% White, 2% Black, 2% American Indian, 1% Hispanic, 3% two or more races, 1% other races, 0% Asian and 0% Pacific Islander with a People of Color Population of 8%. For the 5-year dataset 2018-2022, the U.S. Census Bureau's estimated median household income over the preceding 12 months for the Terrebonne Parish at $ 63,088 or a Low Income of 16.4%.

EJSCREEN also includes multiple "EJ Indexes," which identify minority and/or low-income populations that are exposed to human health or environmental risks. This may include areas that are below the statewide average for minority and/or low-income population (and therefore are not identified by review of the Socioeconomic Indicators) but have a high level of environmental risk. FEMA's Office of Environmental

Planning and Historic Preservation (OEHP) has determined that the screening analysis should include the EJ Indexes in addition to the Socioeconomic Indicators. There are 13 EJ Indexes. Each combines the Demographic Index (averages the minority and low-income populations) with one of the following EJSCREEN "Environmental Indicators" (the EJ Indexes and Environmental Indicators have virtually identical names): Particulate Matter 2.5 Micrometers and Smaller (PM 2.5), Ozone, Diesel Particulate Matter, Air Toxics Cancer Risk, Respiratory Hazard Index, Toxic Releases to Air, Traffic Proximity, Lead Paint, Superfund Proximity, Risk Management Plan (RMP) Facility Proximity, Hazardous Waste Proximity, Underground Storage Tanks, Wastewater Discharge. A minority and/or low-income population exists if one or more EJ Indexes equals or exceeds the 80th percentile compared to the applicable state average.

Table 4. EJSCREEN Environmental Data Indicator Data for a 1-mile Radius Search of the Proposed Project Area

SELECTED VARIABLES	Value	State Average	Percentile in State	USA Average	Percentile in USA
ENVIRONMENTAL BURDEN INDICATORS					
Particulate Matter 2.5 (µg/m^3)	7.67	8.28	6	8.45	34
Ozone (ppb)	59.4	57.7	77	61.8	45
Nitrogen Dioxide (N02) (ppbv)	6.1	6.3	52	7.8	34
Diesel Particulate Matter (µg/m^3)	0.206	0.14	78	0.191	65
Toxic Releases to Air (toxicity weighted concentration)	130	15,000	15	4,600	27
Traffic Proximity (daily traffic count / distance to road)	130,000	390,000	39	1,700,000	20
Lead Paint (% Pre-1960 Housing)	0.018	0.21	21	0.3	18
Superfund Proximity (site count/km distance)	0.17	0.093	83	0.39	68
RMP Facility Proximity (facility count/km distance)	0.25	0.78	41	0.57	48
Hazardous Waste Proximity (facility count/km distance)	2	2.1	61	3.5	59
Underground Storage Tanks (count/km^2)	4.8	2.2	85	3.6	78
Wastewater Discharge (toxicity weighted concentration/m distance)	390	38,000,000	66	700,000	67
Drinking Water-Compliance (points)	0	6.2	0	2.2	0

Source: EJScreen Environmental and Socioeconomic Indicators Data, EPA, October 10, 2024.

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 (E.O. 12898 Environmental Justice: Interim Guidance for FEMA EHP Reviewers [September 2023]). FEMA has no further EO 12898 responsibilities regarding these activities.

4.8.3 Environmental Consequences

Alternative 1 - No Action Alternative
Under the No Action Alternative, the two temporary educational facilities located at the STHS will continue to be utilized by the relocated Lacache Middle School student body.

Alternative 2 - Rebuild Lacache Middle School at Original Site
Under Alternative 2, the Lacache Middle School would be rebuilt at its original location in Chauvin, LA. Reconstruction in its original location with appropriate elevation may limit the original flood risk; however, rebuilding at the original location to current codes and standards would be more expensive than building a new facility at a new location where a previous building does not exist where floodplain standards, elevation wise, are less stringent. Reconstruction of Lacache Middle School at the original location would have no disproportionately high and adverse impact on low-income or minority populations.

Alternative 3 - Rebuild Lacache Middle School at Alternate Location (Proposed Action)
Under Alternative 3, the Proposed Action Alternative of relocating and the construction of a new school has no potential to have disproportionately high and adverse human health or environmental effects on

minority or low-income populations. The proposed action includes the construction of needed educational services for the community rebuilt at current codes and standards and elevation. As a result of storm damage from Hurricane Ida in August 2021, the Lacache Elementary School has been operating at a temporary location (temporary facilities located in a parking lot at STHS, 3879 LA-24, Bourg, LA 70343, ten (10) miles north of the original school site (5266 Louisiana 56, Chauvin LA 70344). The construction of this facility will benefit middle-school aged children within the community and support the objectives of the TPSD. A potential added benefit for the community would be to have STMS next to STHS in the event a family has a child attending STMS, and another attending STHS. The close proximity of the two schools would benefit caregivers dropping off and picking up children at each school.

4.9 Air Quality

4.9.1 Regulatory

The Clean Air Act (CAA) of 1970 (42 U.S.C. § 7401 *et seq*.), including its 1977 and 1990 amendments, is the federal law that regulates air emissions from stationary and mobile sources. This law tasks the USEPA, among its other responsibilities, with establishing primary and secondary air quality standards. Primary air quality standards protect the public's health, including the health of "sensitive populations, such as people with asthma, children, and older adults." Secondary air quality standards protect the public's welfare by promoting ecosystem health, preventing decreased visibility, and reducing damage to crops and buildings. The USEPA also has set National Ambient Air Quality Standards (NAAQS) for the following six (6) criteria pollutants: carbon monoxide (CO), lead (Pb), nitrogen oxides (NOx), ozone (O_3), particulate matter (less than 10 microns [PM_{10}] and less than 2.5 microns [$PM_{2.5}$]), and sulfur dioxide (SO_2).

In addition, the USEPA regulates hazardous air pollutants, such as asbestos, under the "air toxics" provisions of the CAA. Section 112 of the CAA established the National Emission Standards for Hazardous Air Pollutants (NESHAP) and required the USEPA to develop and enforce regulations to protect the public from exposure to airborne contaminants that are known to be hazardous to human health. Major health effects associated with asbestos include lung cancer, mesothelioma, and asbestosis (USEPA 2016a).

Under the 1990 amendments to the CAA, the USEPA may delegate its regulatory authority to any state which has developed an approved State Implementation Plan (SIP) for carrying out the NAAQS mandates or an approved program for the prevention and mitigation of accidental releases under NESHAP. The State of Louisiana's initial SIP was approved in July 2011, and has been revised several times since then. The LDEQ's NESHAP regulatory program was re-approved by USEPA effective 27 April 2015 (New Source Performance Standards, LDEQ 2015). Louisiana's CAA implementing regulations are codified in Title 33.III of the Louisiana Environmental Regulatory Code.

According to 40 C.F.R. § 93.150(a), "No department, agency or instrumentality of the Federal Government shall engage in, support in any way or provide financial assistance for, license or permit, or approve any activity which does not conform to an applicable implementation plan" under NAAQS. In addition, 40 C.F.R. § 93.150(b) states, "A Federal agency must make a determination that a Federal action conforms to the applicable implementation plan in accordance with the requirements of this subpart before the action is taken." 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.

As a result, when FEMA provides financial assistance for a project, such as the one currently under review in this EA, the CAA requires a General Conformity determination whenever the project site is located in a "non-attainment area" for any one (1) of the six (6) NAAQS criteria pollutants (Revisions to the General Conformity Regulations 2010).

4.9.2 Existing Conditions

According to the USEPA, Terrebonne Parish, Louisiana is classified as in attainment, meaning that criteria air pollutants do not exceed the NAAQS (EPA 2009).

4.9.3 Environmental Consequences

Alternative 1 – No Action Alternative

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 – Rebuild Lacache Middle School at Original Site

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, maintaining and covering spoil piles, covering the loads of haul vehicles 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 and keeping construction equipment properly tuned. 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, NO_2, O_3, and PM_{10}, as well as non-criteria pollutants like volatile organic compounds. Long-term emissions associated with the new facility, such as those generated by small engines used for lawn maintenance and offsite generation of electrical power, are expected to be minor and comparable to emissions generated by the previously existing facilities. These impacts are expected to be minor and localized.

Alternative 3 – Rebuild Lacache Middle School at Alternate Location (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 would 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 would include periodic watering of construction areas, maintaining and covering spoil piles, covering the loads of haul vehicles 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 and keeping construction equipment properly tuned. 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, NO_2, O_3, and PM_{10}, as well as non-criteria pollutants like volatile organic compounds. Long-term emissions associated with the new facility, such as those generated by small engines used for lawn maintenance and offsite generation of electrical power, are expected to be minor and

comparable to emissions generated by the previously existing facilities. These impacts are expected to be minor and localized.

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 (scale most similar to range of sounds that the human ear can hear). The Day-Night Average Sound Level (DNL) serves as an averaged sound measurement over a twenty-four (24) hour period with a 10-dB penalty for any sound occurring between 10 p.m. and 7 a.m. to account for the disproportionate effect noise has during these hours and is recognized by federal agencies as a standard for assessing sound impacts and establishing guidelines for compatible land uses (FAA 2024, USEPA 1972).

Sound is subject to federal regulation under the Noise Control Act of 1972 (42 U.S.C. § 4901 *et seq*.), 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.

Terrebonne Parish Code of Ordinances (Section 14-200) and defined as in Section 14-26, has made “excessive noises” pertaining to residences, commercial structures, and domestic animals unlawful. Excessive noises pertaining to any commercial structures, means sound produced by radio, television, loudspeakers, musical equipment or devices, within the interior or on the exterior of commercial buildings, which is audible at a distance of seven and one-half (7.5) meters (twenty-five (25) feet) or exceeds seventy (70) decibels in volume. Excessive noises pertaining to motor vehicles, means sound produced by radio, television, loudspeakers, musical equipment or devices, within the interior or on the exterior of motor vehicles, which is audible at a distance of seven and one-half meters (7.5) (twenty-five (25) feet) or exceeds seventy (70) decibels in volume.

4.10.2 Existing Conditions

Currently, the proposed project site is agricultural. The site is bordered by STHS to the southeast and Highway 24 paralleling Bayou Terrebonne with residential areas to the southwest. The site is bordered by agricultural land and fields and wooded lands to the northwest and northeast respectively. Noise levels at the project site are due to the operation of farm equipment, Houma municipal airport, daily vehicular highway and school traffic, outdoor school extracurricular activities such as football games, track meets, and band performances.

No increased noise levels are present near the original site.

4.10.3 Environmental Consequences

Alternative 1 – No Action Alternative
Under the No Action alternative, there would be no short- or long-term impact on noise levels because no construction would occur.

Alternative 2 – Rebuild Lacache Middle School at Original Site

The construction of the Lacache Middle School at the original location would result in a temporary increase in noise levels at and around the proposed project site because of the operation of construction equipment and increased vehicular activity. Equipment and machinery utilized on the project site would meet all local, state, and federal noise regulations. Noise-sensitive receptors are subject to stress or significant interference from noise. Examples include residential dwellings, mobile homes, hotels, motels, hospitals, nursing homes, educational facilities, libraries, places of worship, a protected area and public park. There are noise sensitive receptors (*i.e.* residential dwellings) adjacent to the project area within 100 feet. Although the proposed action would result in increased noise during construction, the noise is expected to be minor and short term. The contractor would be required to follow the local noise ordinances of Terrebonne Parish as stated above.

After the construction of the new facility, there would be increased noise at and around the facility due to increased occupancy of the developed site. Noises from vehicular traffic to the facility and day-to-day operation and maintenance of the facility are expected. These long-term effects would return noise to pre-Ida levels, therefore having minimal impact on people in the vicinity of the project. Under Alternative 2, noise generated by loudspeakers could potentially disturb the adjacent residents; however, this is not a newly introduced noise at this original location.

Alternative 3 – Rebuild Lacache Middle School at Alternate Location (Proposed Action)

The construction of the Lacache Middle School at the proposed location would result in a temporary increase in noise levels at and around the proposed project site because of the operation of construction equipment and increased vehicular activity. Equipment and machinery utilized on the project site would meet all local, state, and federal noise regulations. Noise-sensitive receptors are subject to stress or significant interference from noise. Examples include residential dwellings, mobile homes, hotels, motels, hospitals, nursing homes, educational facilities, libraries, places of worship, a protected area and public park. There are noise sensitive receptors (*i.e.*, residential dwellings and STHS) adjacent to the project area within 300 feet. Although the proposed action would result in increased noise during construction, the noise is expected to be minor and short term. The contractor should coordinate construction activities with the Subrecipient so as to minimize the potential disruption of any existing adjacent school activities. The contractor would be required to follow the local noise ordinances of Terrebonne Parish as stated above.

After the construction of the new facility, there would be increased noise at and around the facility due to increased occupancy of the developed site. Noises from vehicular traffic to the facility and day-to-day operation and maintenance of the facility are expected. These long-term effects would increase noise in the area; however, the adjacent school and highway generally has similar daily noises produced and would have minimal impact on people in the vicinity of the project. Normal activities at the new middle school campus are unlikely to affect sensitive receptors in the area. The nearest residence to the site is approximately 300 feet away, or three times the distance of the nearest residential dwelling under Alternative 2 above. Under Alternative 3, noise generated by loudspeakers could potentially disturb this homeowner. However, there would be less potential for disturbing nearby neighbors under the Proposed Alternative.

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 [42 U.S.C. §6901 *et seq*.]), the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA [42 U.S.C. §9601 *et seq*.]), the Toxic Substances Control Act of 1976 (TSCA [15 U.S.C. 2601–2692]), the Emergency Planning and Community Right-to-Know Act (EPCRA [42 U.S.C. Chapter 116]),

the Hazardous Materials Transportation Act (HMTA [49 U.S.C. Section 5101 *et seq.*]), and the Louisiana Voluntary Investigation and Remedial Action Act (La. Rev. Stat. 30:2285-2290). 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, the USEPA is authorized 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 section 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.

A review of the USEPA EnviroMapper (USEPA 2024c) and the Voluntary Remediation Program Public Records databases for hazardous waste management and disposal, solid waste disposal, storage tanks, and enforcement revealed that there are no oil and gas wells or leaking underground storage tanks located on the proposed site. However, a review of SONRIS did reveal the presence of two abandoned gas wells within 0.5 mile of the proposed project site. The first site is located approximately 95 feet west of the western property line and approximately 750 feet northwest of proposed project center. This well has a recorded end date of May 01, 1984. The other well site is located on the other side of Bayou Terrebonne approximately 1,850 feet southwest of the proposed project center and is recorded as “Plug and Abandon” on June 23, 1981. The SONRIS GIS database was also searched for a 0.5 mile radius from the existing Lacache Middle School site in Chauvin, LA. A single well site was identified. Per SONRIS records, this well site, located 1,460 feet northeast, was plugged and abandoned on July 29, 1991.

Certain oil and gas exploration and production wastes are exempt from regulation as hazardous wastes under subtitle C of RCRA (40 CFR Parts 260 to 279). However, the RCRA Subtitle C exemption does not preclude these wastes from control under state regulations, under the less-stringent RCRA Subtitle D solid waste regulations, or under other federal regulations, such as the Oil Pollution Act of 1990 (33 U.S.C. Ch.

40 § 2701). In addition, although they are relieved from regulation as hazardous wastes, the exemption does not mean these wastes could not present a hazard to human health and the environment if improperly managed (USEPA 2002). The abandoned well located 750 feet northwest of the proposed project center has been abandoned since 1984 and there is no surface evidence (no bare ground, difference in surrounding vegetation) of contamination of drilling slurry or other exempted materials around the drill site or the site itself. In addition, aerial photos from 1983 and 1989 were reviewed where the well site is recorded to be and there is no above ground evidence of the gas wellhead or other related structures. The surrounding land uses primarily consist of a mix of residential, agricultural pastures and educational facilities. The existing Lacache Middle School facility has natural gas, cable and above ground electric utilities in the right-of-way between the eastern school property line and Little Caillou Rd. (LA 56).

The STMS proposed relocation site itself does not host any structures, roads, or other developments. A drainage ditch runs immediately west and parallel to the proposed property. The utilities adjacent to the property include water, cable, above ground electric distribution and natural gas distribution.

4.11.3 Environmental Consequences

Alternative 1 - No Action Alternative
The "No Action" alternative would not disturb any hazardous materials or create any additional hazards to human health.

Alternative 2 - Rebuild Lacache Middle School at Original Site
Alternative 2 would not disturb any ground-based hazardous materials. However, based on the age and the type of facility it is likely to contain asbestos containing materials (ACM) in common sources such as floor and acoustic tiles, pipe and water heater wraps. If this facility were to be demolished to accommodate a new facility, a survey of ACM would be required and mitigation measures would be required to contain airborne asbestos and any other site-related hazardous materials. Reconstruction of the school may involve the use of hazardous materials (*e.g.*, petroleum products, cement, caustics, acids, solvents, paints, electronic components, pesticides/herbicides and fertilizers, and/or treated timber) and may result in the generation of small amounts of hazardous wastes. Under Alternative 2, appropriate BMPs would be followed. Measures to prevent, minimize, and control spills of hazardous materials would be implemented and any generated hazardous or non-hazardous wastes disposed of in accordance with applicable federal, state, and local requirements.

Alternative 3 - Rebuild Lacache Middle School at Alternate Location (Proposed Action)
The examination of the proposed action reveals the absence of hazardous materials, wastes, or substances within the project site. Project construction activities at the school may involve the use of hazardous materials (*e.g.*, petroleum products, cement, caustics, acids, solvents, paints, electronic components, pesticides/herbicides and fertilizers, and/or treated timber) and may result in the generation of small amounts of hazardous wastes. 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 wastes generated would be disposed of in compliance with the relevant federal, state, and local requirements.

To ensure the site is free of hazardous materials, contamination, toxic chemicals, gases, and radioactive substances where the hazard could affect the health and safety of occupants or conflict with the intended utilization of the property a Phase I Environmental Site Assessment is required before initiating work.

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 Terrebonne Parish School Board. 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). Table 5 below provides a listing and descriptions of known present, past, and reasonably foreseeable future actions undertaken by private and governmental interests within 1.5 miles of the proposed project area. Projects outside this review area that may influence the proposed project and surrounding area have also been included and may contribute to cumulative impacts when considered with the effects of the proposed action.

The Proposed Action seeks to recover from flooding and wind damages by relocating the Lacache Middle School campus to an undeveloped site north of Highway 24 and northwest of the existing STHS. The project is located at 29.565236°N, 90.643287°W in zip code 70343. The total area is approximately 13.5 acres and FEMA recommends a 1.5-mile radius buffer for the cumulative impact analysis. There are no known recently completed or proposed mitigation or natural restoration projects within 1.5 miles of the project site. Table 5 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.

The proposed project is expected to have short-term impacts including noise, transportation disruptions, and potential utility disruptions during construction. The 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 5), 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.

Table 5. Projects that May Have the Potential to Contribute to Cumulative Impacts

Project Name/Status	Lead Agency or Firm	Location	Description	Cumulative Impact(s)	Rationale
Morganza to the Gulf of Mexico Project / Ongoing	USACE	Located in coastal Louisiana approximately 60 miles southwest of New Orleans and includes portions of Terrebonne and Lafourche parishes.	The authorized Morganza to the Gulf (MTG) project is a Hurricane and Storm Damage Risk Reduction (HSDRR) project involving a 98-mile alignment of earthen levees, floodgates, environmental water control structures, road/railroad gates, and fronting protection for existing pump stations. This system is being designed to reduce the risk of damage related to flooding for the 1% Annual Exceedance Probability (AEP) in Terrebonne and Lafourche Parishes where a deterioration of coastal march has led to an increased risk of inundation.	None / Beneficial	This system will reduce the risk of damage related to flooding to approximately 52,000 structures and a population of 200,000 in an area of intense concentration of energy infrastructure near the confluence of two nationally significant navigation corridors in the Mississippi River and the Gulf Intracoastal Water Way (GIWW).
STHS Campus Buildings and Recreation Facilities (PNs 677720, 1204542, 1204538, 1204537, 1204536, 1204534, 1204533, 1204532, 1204531, 1204530, 1204529, 1204543, 1204540, 1204528, 1204328, 1204327, 1204539, 1204527) / Ongoing	FEMA	STHS, 3879 LA-24 Bourg, LA 70343	FEMA proposes to repair several internal and external permanent and portable facilities to pre-disaster design, function, and capacity (in-kind) within existing footprints.	None. All work intended to return facility to pre-disaster conditions.	STHS was severely damaged from Hurricane Ida making several facility elements unusable by the student body. Repairs will bring the facility back to pre-disaster operational capacity.

Project Name/Status	Lead Agency or Firm	Location	Description	Cumulative Impact(s)	Rationale
Houma Terrebonne Airport Commission (PNs 1217959, 1222570, 1222571, 1222573, 1222574, 1222575, 1306898, 1306900, 1306901, 1306903) / Ongoing	FEMA	Southeast Houma, approx. 1-mile from proposed project area	FEMA proposes to repair several internal and external permanent facilities to pre-disaster design, function, and capacity (in-kind) within existing footprints and replace structures that were substantially damaged.	None.	Houma-Terrebonne Airport was severely damaged from Hurricane Ida making several facility elements unusable by the general public. Building replacements and repairs will bring the facility back to pre-disaster operational capacity.
Bulkhead & Fill, Coastal Use Permit / Completed July 2019	LDNR	2,125 LF from northwest of proposed project area	Proposed construction of a bulkhead along Bayou Terrebonne at Lot 21 of Shoreline Heights Subdivision. Approximately 10 cubic yards of native material will be excavated and placed behind the bulkhead.	None	Construction of a bulkhead along Bayou Terrebonne would have no negative cumulative effect on the surrounding environment or people.

Project Name/Status	Lead Agency or Firm	Location	Description	Cumulative Impact(s)	Rationale
Softball field / Active	Terrebonne Parish School Board (TPSD)	STHS	New construction of a softball (ball) field northeast of proposed project area.	Reduction in Prime Farmland, and conversion of open space to a sports field.	The TPSD parcel that encompasses the ball field and the proposed project is classified by NRCS as Prime Farmland. Based on the minimal area of conversion both sites would be considered exempt. Conversion of open space to educational facilities and a sports field would reduce potential wildlife habitat. However, given the large areas of open habitat that are of greater overall value that are closely adjacent to the north and northeast of these areas would result in a very low cumulative impact.

6.0 PUBLIC INVOLVEMENT

On September 18, 2020, the official Federal Emergency Management website issued a DR-4611-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 Ida, 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 (Appendix 7. FEMA DR-4611-LA Public Notice).

Terrebonne Parish School District, on its official website, has provided a design and construction schedule for all of its Hurricane Ida affected properties, including Lacache Middle School, detailing each process step from inspection to construction (TPSD 2024).

This public notice will run in the journal of record for the State of Louisiana, *The Advocate*, and *The Courier* in Terrebonne Parish for five (5) Mondays on January 6, 13, 20, 27; and February 3, 2025. The draft EA, draft FONSI (Appendix 8), and 8-Step (Appendix 3) are available for review at the following locations during business hours: Terrebonne Parish Library at 151 Library Drive, Houma, Louisiana 70360.

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 Subrecipient 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 minimize the disturbed area and preserve the existing vegetation, while also maintaining topsoil whenever possible.

- 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 demolition 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.

- The Subrecipient is required to plant two trees for every tree removed, should tree removal be necessary.

- The contractor will avoid the western tree line and associated wetland extending to Bayou Terrebonne. If necessary, any encroachment into waters of the United States will first require an aquatic resources delineation (wetland delineation) and an appropriate Clean Water Act permit issued by the US Army Corps of Engineers.

- 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.

- To ensure the site is free of hazardous materials, contamination, toxic chemicals, gases and radioactive substances where the hazard could affect the health and safety of occupants or conflict with the intended utilization of the property a Phase I Environmental Site Assessment is required before initiating work.

- Terrebonne Parish Code of Ordinances (Section 14-200) and defined as in Section 14-26, has made "excessive noises" pertaining to residences, commercial structures, and domestic animals unlawful. Excessive noises pertaining to any commercial structures, means sound produced by radio, television, loudspeakers, musical equipment or devices, within the interior or on the exterior of commercial buildings, which is audible at a distance of seven and one-half (7.5) meters (twenty-five (25) feet) or exceeds seventy (70) decibels in volume. Excessive noises pertaining to motor vehicles, means sound produced by radio, television, loudspeakers, musical equipment or devices, within the interior or on the exterior of motor vehicles, which is audible at a distance of seven and one-half meters (7.5) (twenty-five (25) feet) or exceeds seventy (70) decibels in volume.

- 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.

- Subrecipient is required to design and construct project to V-zone standards in accordance with ASCE standard 24-14, Flood Resistant Design and Construction, or latest edition, must coordinate with the local floodplain administrator to obtain required permits prior to initiating work, and comply with any conditions of the permit to ensure harm to the floodplain is minimized. 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 Subrecipient 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 Subrecipient 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 Subrecipient must halt work in the proximity of the finding and implement all necessary measures to mitigate potential damage. It is imperative that the Subrecipient 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 Preservation Officer (SHPO) and any other relevant parties.

- Bald Eagles 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 their preservation, the USFWS 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.

- For actions located in the floodplain and/or wetlands, the applicant must issue a final public notice per 44 CFR Part 9.12(e) at least 15 days prior to the start of work. The final notice shall include the following: (1) A statement of why the proposed action must be located in an area affecting or affected by a floodplain or a wetland; (2) A description of all significant facts considered in making this determination; (3) A list of the alternatives considered; (4) A statement indicating whether the action conforms to applicable state and local floodplain protection standards; (5) A statement indicating how the action affects or is affected by the floodplain and/or wetland, and how mitigation is to be achieved; (6) Identification of the responsible official or organization for implementation and monitoring of the proposed action, and from whom further information can be obtained; and (7) A map of the area or a statement that such map is available for public inspection, including the location at which such map may be inspected and a telephone number to call for information.

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APPENDICES

LIST OF APPENDICES SUMMARY

FEMA has worked to ensure that this EA document is accessible to persons with disabilities, in compliance with Section 508 of the Rehabilitation Act of 1973. Regarding the EA's Appendices, which are provided in a separate document, this EA has reported what was done and how those results affect the decision that will be made based on the totality of the EA findings. In case any of these appendices poses a challenge to be read electronically by persons with disabilities, each appendix is briefly described and summarized below, rather than being simply listed.

Appendix 1. Solicitation of Views. This section is comprised of the Solicitation of Views (SOV) sent out to state and federal resource agencies and their responses. A solicitation of views prepared by FEMA and sent to Louisiana Department of Environmental Quality (LDEQ), Louisiana Department of Wildlife and Fisheries (LDWF), U.S. Army Corps of Engineers (USACE), U.S. Fish and Wildlife Services (USFWS), U.S. Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS), and U.S. Environmental Protection Agency (USEPA) on August 16, 2024. The email contained a narrative Scope of Work (SOW), construction plans, and maps.

Appendix 2. U.S. Department of Agriculture Correspondence. Brandon Waltman, USDA NRCS responded on August 22, 2024, via emailed letter that the proposed relocation area for the high school is located in an urban area and therefore is exempt from the rules and regulations of the Farmland Protection Policy Act (FPPA)—Subtitle I of Title XV, Section 1539-1549.

Appendix 3. Executive Order 11998 and 11990, Floodplains and Wetlands, 8-Step Decision Making Process. This 8-Step checklist documents the decision-making process for Executive Orders (EOs) 11988 and 11990, Floodplains and Wetlands, by completing an 8-step form. This process ensures that FEMA considers how its actions affect floodplains and/or wetlands.

Appendix 4. U.S. Fish and Wildlife Service Correspondence. U.S. Fish & Wildlife Service Consultation Letter, Species List Louisiana Ecological Services Field Office, and No Effect (NE) Consistency Letter. This 5-page project consistency letter documents the No Effect determination made by FEMA in consultation with the US Fish and Wildlife Service for the Federally Threatened West Indian Manatee (*Trichechus manatus*). The letter further lists three additional ESA-protected species with proposed status listings that also may occur in the Action Area: Alligator Snapping Turtle (*Macrochelys temminckii*, Proposed Threatened), Monarch Butterfly (*Danaus plexippus*, Candidate), and Tricolored Bat (*Perimyotis subflavus,* Proposed Endangered).

Appendix 5. LA Department of Wildlife and Fisheries, Wildlife Diversity Program Correspondence. Carolyn Michon, Louisiana Department of Wildlife and Fisheries responded on August 23, 2024, via emailed letter that there are no impacts to rare, threatened, or endangered species or critical habitats are anticipated for the proposed project and no state wildlife refuges or wildlife management areas are known to occur at the specified site within Louisiana's boundaries.

Appendix 6. State Historic Preservation Office Concurrence. The letter states, based on the description of the Area of Potential Effect (APE), the proposed ground-disturbing activities, and the identification of historic properties within the APE, the State Historic Preservation Office (SHPO) concurs with the assessment that no historic properties listed in or eligible for listing in the National Register of Historic Places will be affected by this project. SHPO office has no further concerns for this project.

Appendix 7. Public Notice of Availability. This appendix contains the Public Notice of Availability that is provided in its entirety.

Appendix 8. Draft FONSI. This appendix contains the Draft Finding of No Significant Impact (FONSI) that is provided in its entirety.

APPENDIX 1

SOLICITATION OF VIEWS

U.S. Department of Homeland Security
Federal Emergency Management Agency
FEMA-DR 4611 LA
Louisiana Integration and Recovery Office (LIRO)
1500 Main Street
Baton Rouge, LA 70802

August 14, 2024

MEMORANDUM

TO: See Distribution

SUBJECT: Scoping Notification/Solicitation of Views
South Terrebonne Middle School
Terrebonne Parish School Board
FEMA Public Assistance Program, FEMA-DR-4611-LA

The Department of Homeland Security's Federal Emergency Management Agency (FEMA) is mandated by the U.S. Congress to administer federal disaster assistance pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), PL 93-288, as amended.

The Stafford Act authorizes FEMA's Public Assistance Program to repair, restore, reconstruct, or replace a public facility damaged or destroyed by a major disaster and make grants available for the purpose of removing disaster generated debris. FEMA is considering providing funding for the above-referenced project in relation to Hurricane Ida (FEMA-DR-4611-LA).

The proposed project location has been identified as approximately 23.95 acres located immediately northwest of the South Terrebonne High School at 3858 Highway 24, Bourg, LA 70343 (29.565298, -90.643346). The proposed new school (approximately 81,650 square feet) is on an undeveloped and active agricultural parcel (APN 42331) of land (29.565532, -90.643285) and is owned by Terrebonne Parish School Board. The proposed campus location four (4) corner coordinates are: North (29.568240, -90.642962), South (29.564022, -90.642811), East (29.567027, -90.640687), and West (29.565123, -90.644892). The proposed new school, named South Terrebonne Middle School, would retain the same educational purpose and function. The proposed campus includes a main building with three (3) classroom wings, a gymnasium, cafeteria, kitchen, offices, and athletic fields for students. The applicant has submitted minimum standards to be applied to the replacement facility and improve resiliency by building a replacement facility to meet current design standards, due to the age of the original facilities (e.g., 1950, 1955 and 1967). See Figure 1 for proposed layout of new construction.

To ensure compliance with the National Environmental Policy Act (NEPA), Executive Orders (EOs), and other applicable federal regulations, FEMA-EHP will be preparing an Environmental Assessment (EA). To assist us in preparation of the EA, FEMA-EHP requests that your office review the attached documents for a determination as to the requirements of any regulatory permits, determinations, and authorizations.

Please review the attached information to determine whether your office has any objections to the proposed project and whether any permits from your office would need to be obtained. We would appreciate your comments on this project within thirty (30) calendar days of the date of this scoping notification. If we do not receive comments from your office within this time period, we will assume that your agency has no concerns or issues with the proposed project. If appropriate, FEMA will add the condition that the applicant will be required to obtain applicable permits from your office.

For questions regarding this matter, please contact Kristiaan Stuart, Environmental Protection Specialist, at (225) 610-0860 and LeSchina Holmes, Deputy Environmental Liaison Officer, at (504) 235-6512. Comments may be e-mailed to kristiaan.stuart@associates.fema.dhs.gov and leschina.holmes@fema.dhs.gov.

Tiffany Spann-Winfield
Environmental Liaison Officer (ELO)
FEMA LIRO
Distribution: USEPA, USACE, USFWS, NRCS, LDWF, LDNR

Attachments:
Project Maps

Figure 1: Proposed Project Layout (Photo Credit: The Applicant).

** Note – ballfields as depicted are not under consideration at this time.*

Figure 2: Lacache Middle School Original Site Location; Chauvin, LA

Figure 3a: Proposed Relocation Site Aerial; Bourg, LA

Figure 3b: Proposed Alternate Relocation Site Aerial Image and Footprint Elements

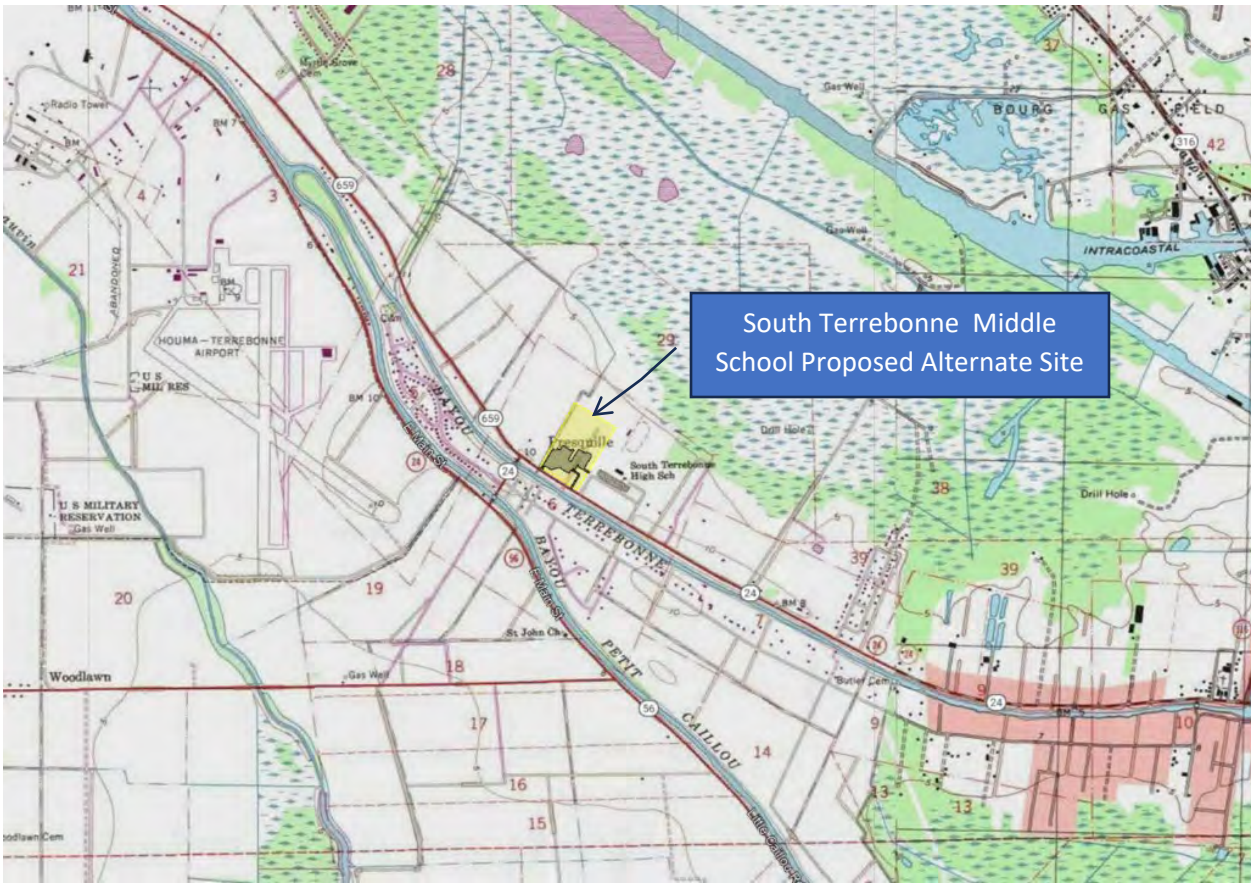

Figure 4: Proposed Relocation Site Topographic Map (T17S, R18E, Sect. 18)

APPENDIX 2

US DEPARTMENT OF AGRICULTURE CORRESPONDENCE

USDA
United States Department of Agriculture

August 22, 2024

Kristiaan Stuart
Serco, Environmental Planner (CTR)
Federal Emergency Management Agency
Louisiana Interim Recovery Agency

RE: Scoping Notification/Solicitation of Views
South Terrebonne Middle School
Terrebonne Parish School Board
FEMA Public Assistance Program, FEMA-DR-4611-LA

Kristiaan:

I have reviewed the above referenced project for potential requirements of the Farmland Protection Policy Act (FPPA) and potential impact to Natural Resources Conservation Service projects in the immediate vicinity.

Projects are subject to FPPA requirements if they may irreversibly convert farmland (directly or indirectly) to nonagricultural use and are completed by a federal agency or with assistance from a federal agency. For the purpose of FPPA, farmland includes prime farmland, unique farmland, and land of statewide or local importance. Farmland subject to FPPA requirements can be forest land, pastureland, cropland, or other land, but not water or urban built-up land.

The project map and narrative submitted with your request indicates that the proposed relocation area for the high school is located in an urban area and therefore is exempt from the rules and regulations of the Farmland Protection Policy Act (FPPA)—Subtitle I of Title XV, Section 1539-1549. Furthermore, we do not predict impacts to NRCS work in the vicinity.

For specific information about the soils found in the project area, please visit our Web Soil Survey at the following location: http://websoilsurvey.nrcs.usda.gov/

Please direct all future correspondence to me at the address shown below.

Respectfully,

Brandon Waltman
Assistant State Soil Scientist

Attachment

Natural Resources Conservation Service
State Office
3737 Government Street
Alexandria, Louisiana 71302
Voice: (337) 290-4720 Fax: (844) 325-6947

Helping People Help the Land

U.S. Department of Agriculture

FARMLAND CONVERSION IMPACT RATING

PART I *(To be completed by Federal Agency)*	Date Of Land Evaluation Request 8/14/2024
Name of Project South Terrebonne Middle School	Federal Agency Involved DHS / FEMA / Public Assistance
Proposed Land Use Institutional/Public	County and State Terrebonne Parish, LA
PART II *(To be completed by NRCS)*	Date Request Received By NRCS 8/16/2024 / Person Completing Form: Brandon Waltman
Does the site contain Prime, Unique, Statewide or Local Important Farmland? *(If no, the FPPA does not apply - do not complete additional parts of this form)* YES NO	Average Farm Size
Acres: %	Amount of Farmland As Defined in FPPA Acres: %
Name of Land Evaluation System Used / Name of State or Local Site Assessment System	Date Land Evaluation Returned by NRCS 08/22/2024

PART III *(To be completed by Federal Agency)*	Alternative Site Rating			
	Site A	Site B	Site C	Site D
A. Total Acres To Be Converted Directly				
B. Total Acres To Be Converted Indirectly				
C. Total Acres In Site				
PART IV *(To be completed by NRCS)* Land Evaluation Information				
A. Total Acres Prime And Unique Farmland				
B. Total Acres Statewide Important or Local Important Farmland				
C. Percentage Of Farmland in County Or Local Govt. Unit To Be Converted				
D. Percentage Of Farmland in Govt. Jurisdiction With Same Or Higher Relative Value				
PART V (To be completed by NRCS) Land Evaluation Criterion Relative Value of Farmland To Be Converted (Scale of 0 to 100 Points)				

PART VI *(To be completed by Federal Agency)* Site Assessment Criteria *(Criteria are explained in 7 CFR 658.5 b. For Corridor project use form NRCS-CPA-106)*	Maximum Points	Site A	Site B	Site C	Site D
1. Area In Non-urban Use	(15)	6			
2. Perimeter In Non-urban Use	(10)	6			
3. Percent Of Site Being Farmed	(20)	20			
4. Protection Provided By State and Local Government	(20)	0			
5. Distance From Urban Built-up Area	(15)	0			
6. Distance To Urban Support Services	(15)	0			
7. Size Of Present Farm Unit Compared To Average	(10)	0			
8. Creation Of Non-farmable Farmland	(10)	10			
9. Availability Of Farm Support Services	(5)	2			
10. On-Farm Investments	(20)	0			
11. Effects Of Conversion On Farm Support Services	(10)	0			
12. Compatibility With Existing Agricultural Use	(10)	0			
TOTAL SITE ASSESSMENT POINTS	160	44	0	0	0
PART VII *(To be completed by Federal Agency)*					
Relative Value Of Farmland *(From Part V)*	100	0	0	0	0
Total Site Assessment *(From Part VI above or local site assessment)*	160	44	0	0	0
TOTAL POINTS *(Total of above 2 lines)*	260	44	0	0	0

Site Selected:	Date Of Selection	Was A Local Site Assessment Used?
		YES ☐ NO ☑

Reason For Selection:

Name of Federal agency representative completing this form: Kristiaan Stuart — Date: 08/15/2024

(See Instructions on reverse side)

Form AD-1006 (03-02)

STEPS IN THE PROCESSING THE FARMLAND AND CONVERSION IMPACT RATING FORM

Step 1 - Federal agencies (or Federally funded projects) involved in proposed projects that may convert farmland, as defined in the Farmland Protection Policy Act (FPPA) to nonagricultural uses, will initially complete Parts I and III of the form. For Corridor type projects, the Federal agency shall use form NRCS-CPA-106 in place of form AD-1006. The Land Evaluation and Site Assessment (LESA) process may also be accessed by visiting the FPPA website, http://fppa.nrcs.usda.gov/lesa/.

Step 2 - Originator (Federal Agency) will send one original copy of the form together with appropriate scaled maps indicating location(s)of project site(s), to the Natural Resources Conservation Service (NRCS) local Field Office or USDA Service Center and retain a copy for their files. (NRCS has offices in most counties in the U.S. The USDA Office Information Locator may be found at http://offices.usda.gov/scripts/ndISAPI.dll/oip_public/USA_map**,** or the offices can usually be found in the Phone Book under U.S. Government, Department of Agriculture. A list of field offices is available from the NRCS State Conservationist and State Office in each State.)

Step 3 - NRCS will, within 10 working days after receipt of the completed form, make a determination as to whether the site(s) of the proposed project contains prime, unique, statewide or local important farmland. (When a site visit or land evaluation system design is needed, NRCS will respond within 30 working days.

Step 4 - For sites where farmland covered by the FPPA will be converted by the proposed project, NRCS will complete Parts II, IV and V of the form.

Step 5 - NRCS will return the original copy of the form to the Federal agency involved in the project, and retain a file copy for NRCS records.

Step 6 - The Federal agency involved in the proposed project will complete Parts VI and VII of the form and return the form with the final selected site to the servicing NRCS office.

Step 7 - The Federal agency providing financial or technical assistance to the proposed project will make a determination as to whether the proposed conversion is consistent with the FPPA.

INSTRUCTIONS FOR COMPLETING THE FARMLAND CONVERSION IMPACT RATING FORM

(For Federal Agency)

Part I: When completing the "County and State" questions, list all the local governments that are responsible for local land use controls where site(s) are to be evaluated.

Part III: When completing item B (Total Acres To Be Converted Indirectly), include the following:

1. Acres not being directly converted but that would no longer be capable of being farmed after the conversion, because the conversion would restrict access to them or other major change in the ability to use the land for agriculture.
2. Acres planned to receive services from an infrastructure project as indicated in the project justification (e.g. highways, utilities planned build out capacity) that will cause a direct conversion.

Part VI: Do not complete Part VI using the standard format if a State or Local site assessment is used. With local and NRCS assistance, use the local Land Evaluation and Site Assessment (LESA).

1. Assign the maximum points for each site assessment criterion as shown in § 658.5(b) of CFR. In cases of corridor-type project such as transportation, power line and flood control, criteria #5 and #6 will not apply and will, be weighted zero, however, criterion #8 will be weighed a maximum of 25 points and criterion #11 a maximum of 25 points.

2. Federal agencies may assign relative weights among the 12 site assessment criteria other than those shown on the FPPA rule after submitting individual agency FPPA policy for review and comment to NRCS. In all cases where other weights are assigned, relative adjustments must be made to maintain the maximum total points at 160. For project sites where the total points equal or exceed 160, consider alternative actions, as appropriate, that could reduce adverse impacts (e.g. Alternative Sites, Modifications or Mitigation).

Part VII: In computing the "Total Site Assessment Points" where a State or local site assessment is used and the total maximum number of points is other than 160, convert the site assessment points to a base of 160.
Example: if the Site Assessment maximum is 200 points, and the alternative Site "A" is rated 180 points:

$$\frac{\text{Total points assigned Site A}}{\text{Maximum points possible}} = \frac{180}{200} \text{ X } 160 = 144 \text{ points for Site A}$$

For assistance in completing this form or FPPA process, contact the local NRCS Field Office or USDA Service Center.

NRCS employees, consult the FPPA Manual and/or policy for additional instructions to complete the AD-1006 form.

Figure 1: Proposed Project Layout (Photo Credit: TPSD).

** Note – ballfields as depicted are not under consideration at this time.*

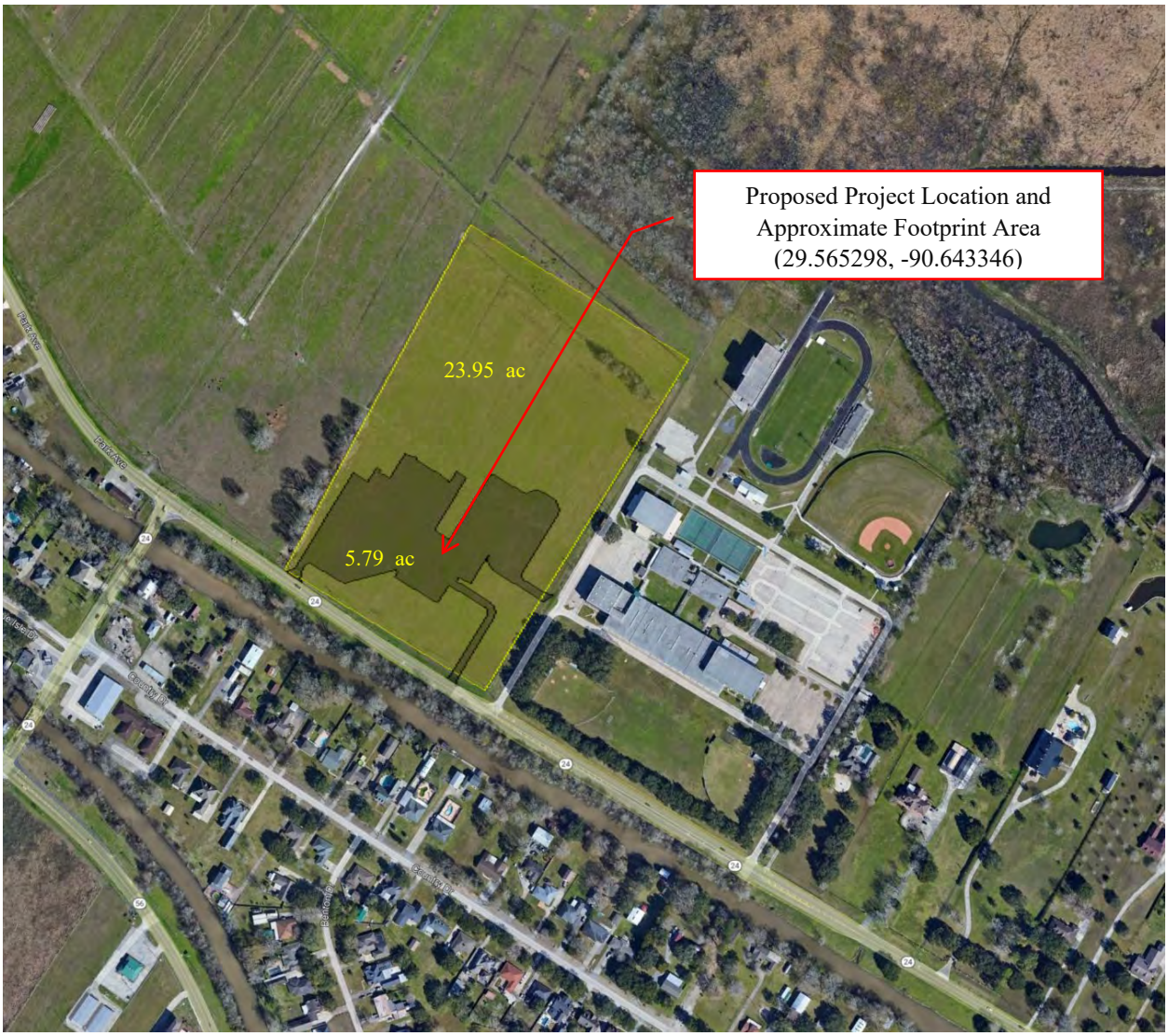

Figure 2a: Proposed Relocation Site Aerial; Bourg, LA

Figure 2b: Proposed Alternate Relocation Site Aerial Image and Footprint Elements

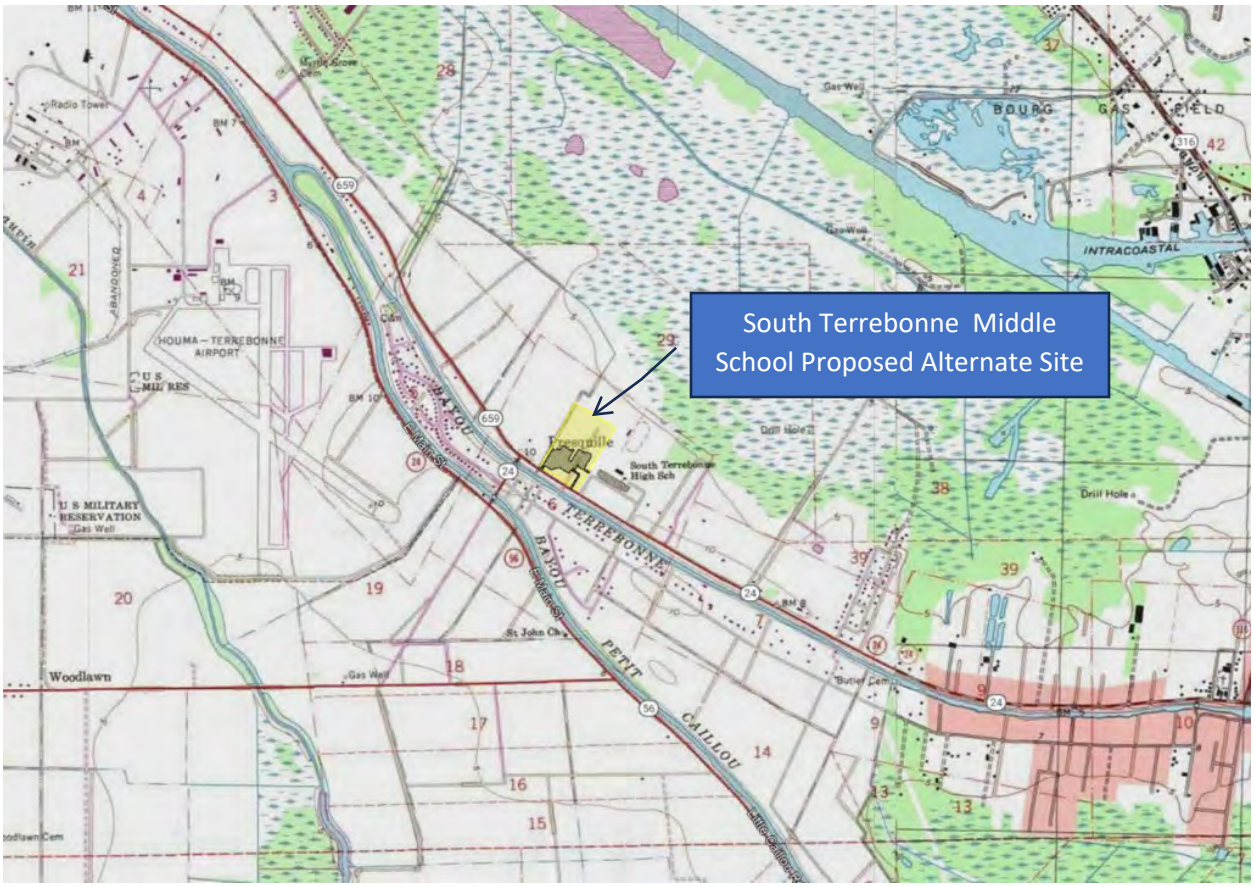

Figure 3: Proposed Relocation Site Topographic Map (T17S, R18E, Sect. 18)

APPENDIX 3

EXECUTIVE ORDERS 11990 and 11998, FLOODPLAIN and WETLAND, 8-STEP DECISION MAKING PROCESS

EXECUTIVE ORDER 11988/11990

FLOODPLAIN MANAGEMENT/WETLANDS – CHECKLIST (44 CFR Part 9)

APPLICANT:	Terrebonne Parish School District
COUNTY/STATE:	Terrebonne Parish, LA
COORDINATES:	South Terrebonne Middle School (Proposed [29.565236, -90.643287])
PROPOSED ACTION:	Terrebonne Parish School District (TPSD [Subrecipient]) requests the relocation of Lacache Middle School in Chauvin, LA to a new undeveloped site in Bourg, LA. The proposed South Terrebonne Middle School (STMS) is located immediately adjacent and northwest of the existing STHS at 3879 Highway 24, Bourg, LA 70343 (29.56427, -90.64006) approximately 10 miles north of the original location. The parcel is approximately 13.5 acres. This alternative includes demolition of the original damaged facilities, construction of a two-story, two-winged, single-campus building with two adjoining parking areas with a gross building area of 81,564 square feet and a total gross developed area of approximately 252,100 square feet. The proposed facility would have 32 standard classrooms; 2 physical education classrooms and supporting rooms for IT, band, resources, janitorial, and faculty; and a cafeteria and gymnasium. TPSD has expressed the need to begin construction in March of 2025. This 8-Step review is only evaluating Alternative 3 – Proposed, Preferred Alternative, as determined through the Environmental Assessment decision-making process.

APPLICABILITY: Actions which have the potential to affect floodplains/wetlands or their occupants, or which are subject to potential harm by location in floodplains/wetlands.

☒**YES** ☐**NO** The proposed action could potentially adversely affect the floodplain/wetlands.

Remarks:

☒**YES** ☐**NO** The proposed action could potentially be adversely affected by the floodplain/wetlands.

Remarks: Building construction to V-zone standards will minimize the effects created by occupancy. Additionally, the grant will be conditioned to require local Floodplain Administrator coordination for the construction of the facility in compliance with local floodplain regulations.

ACTION:

☐ **Review against 500 Year floodplain (for Critical Action)**

☒ **Review against 100 Year floodplain**

☐ **Not Applicable (for actions located in wetland only)**

STEP NO. 1 **Determine whether the proposed action is located in the 100-year floodplain (500-year floodplain for critical actions) and/or wetland; (44 CFR §9.7).**

The project is located within an AE-Coastal Floodplain, area of 100-yr flooding, per Effective Flood Insurance Rate Map (FIRM) panel 22109C0260E, dated 9/7/2023 and is also located in Zone X, 0.2 PCT Annual Chance Flood Hazard in Coastal Zone, FIRM panel 22109C0260E, dated 9/7/2023.

STEP NO. 2 **Notify the public at the earliest possible time of the intent to carry out an action in a floodplain/wetland, and involve the affected and interested public in the decision-making process; (44 CFR §9.8).**

☒ Notice was provided as part of a disaster cumulative notice:

Newspaper: https://www.fema.gov/sites/default/files/documents/fema_dr-4611-la-ehp-public-notice-001.pdf

Date: 10/1/2021

☒ Project Specific Notice (e.g., EA, newspaper, public meeting, etc):

Type of Public Notice: Newspaper: The Courier and The Advocate

Date: TBD

STEP NO. 3 **Identify and evaluate practicable alternatives to locating the proposed action in a floodplain/wetland (including alternatives sites, actions and the "no action" option). (44 CFR §9.9)**

Alternative Options

☐**YES** ☒**NO** Is there a practicable alternative site location outside of the floodplain/wetland?

If yes, provide the site location:

☐**YES** ☒**NO** Is there a practicable alternative action outside of the floodplain/wetland that will not affect the floodplain/wetland?

If yes, describe the alternative action:

☐**YES** ☒**NO** Is the NO Action alternative the most practicable alternative?

If a practicable alternative exists outside the floodplain/wetland, FEMA must locate the action at the alternative site.

REMARKS:

Lacache Middle School has been subject to repetitive storm-related damage, and the parish population continues a northward shift with each tropical system that affects the area. Currently, and for the past year, the Lacache Middle School student body has been using two modular educational facilities with 12 classrooms each located in the eastern parking lot of the South Terrebonne High School (STHS).

The construction of a permanent STMS is needed in a manner that best mitigates against future flood hazards and services the community for the TPSD to meet its objective. Normal operations at STHS also need to resume allowing full utilization of parking areas, which are currently occupied by the modular units housing the Lacache Middle School student body.

STEP NO. 4 Identify the potential direct and indirect impacts associated with the occupancy or modification of floodplains/wetlands and the potential direct and indirect support of floodplain/wetlands development that could result from the proposed action; (44 CFR §9.10)

☒**YES** ☐**NO** Is the proposed action in compliance with the NFIP (see 44 CFR Part 59 seq.)?

☐**N/A** Remarks: FEMA PA guidelines in the PAPPG dictate all facilities must comply with NFIP standards, at a minimum, even if the community is not an NFIP participant.

☐**YES** ☒**NO** Does the proposed action increase the risk of flood loss?

☒**YES** ☐**NO** Will the proposed action result in an increased base discharge or increase the flood hazard potential to other properties or structures?

☒**YES** ☐**NO** Does the proposed action minimize the impact of floods on human health, safety and welfare?

☒**YES** ☐**NO** Will the proposed action induce future growth and development, which will potentially adversely affect the floodplain/wetland?

☒**YES** ☐**NO** Does the proposed action involve dredging and/or filling of a floodplain/wetlands?

☐**YES** ☒**NO** Will the proposed action result in the discharge of pollutants into the floodplain/wetlands?

☒**YES** ☐**NO** Does the proposed action avoid long, and short-term adverse impacts associated with the occupancy and modification of floodplains/wetlands?

☐**N/A** Remarks:

☒**YES** ☐**NO** Will the proposed action result in any indirect impacts that will affect the natural values and functions of floodplains/wetlands?

☒**YES** ☐**NO** Will the proposed action forego an opportunity to restore the natural and beneficial values served by floodplains/wetlands?

☐**N/A** Remarks:

☐**YES** ☒**NO** Does the proposed action restore and/or preserve the natural and beneficial values served by floodplains/wetlands?

☐**N/A** Remarks:

☒**YES** ☐**NO** Will the proposed action result in an increase to the useful life of a structure or facility?

REMARKS: The relocation of Lacache Middle School to the proposed location will convert open agricultural land to a developed property with hardscape features; however, this proposed project will also minimize threats to the public's health/safety from future flooding events by relocating to a site with reduced flood risk and building the new facility to a V-zone construction standard per ASCE 24-14 regulations.

STEP NO. 5 Minimize the potential adverse impacts and support to or within floodplains/wetlands to be identified under Step 4, restore and preserve the natural and beneficial values served by floodplains/wetlands; (44 CFR §9.11)

☒**YES** ☐**NO** Were flood hazard reduction techniques applied to the proposed action to minimize the flood impacts if site location is in the 100- or 500-Year floodplain/wetlands?

☐**N/A** Remarks:

☒**YES** ☐**NO** Were avoidance and minimization measures applied to the proposed action to minimize the short- and long-term impacts on the 100-Year floodplain/wetlands?

If no, identify measures required as a condition of the grant:

☐**N/A** Remarks: Applicant must coordinate with the local floodplain administrator, obtain any required permits prior to initiating work, and comply with any conditions of the permit to ensure harm to and from the floodplain is minimized. All coordination pertaining to these activities should be retained as part of the project file in accordance with the respective grant program instructions.

☐**YES** ☒**NO** Were measures implemented to restore and preserve the natural and beneficial values of the floodplain/wetlands.

If no, identify measures required as a condition of the grant:

☐**N/A** Remarks: Applicant must coordinate with the local floodplain administrator, obtain any required permits prior to initiating work, and comply with any conditions of the permit to

ensure harm to and from the floodplain is minimized. All coordination pertaining to these activities should be retained as part of the project file in accordance with the respective grant program instructions.

☐**YES** ☒**NO** Is new construction or substantial improvement in a floodway, and new construction in a coastal high hazard area proposed?

If YES: Is the activity considered as functionally dependent use or a structure or facility which facilitates an open space use?

☐**YES** ☐**NO**

REMARKS: The relocation of Lacache Middle School to the proposed location will convert open agricultural land to a developed property with hardscape features; however, this proposed project will also minimize threats to the public's health/safety from future flooding events by relocating to a site with reduced flood risk and building the new facility to a V-zone construction standard per ASCE 24-14 regulations.

STEP NO. 6 **Reevaluate the proposed action to determine first, if it is still practicable in light of its exposure to flood hazards, the extent to which it will aggravate the hazards to others, and its potential to disrupt floodplain/wetlands values and second, if alternatives preliminarily rejected at Step 3 are practicable in light of the information gained in Steps 4 and 5. (44 CFR §9.9)**

☒**YES** ☐**NO** The action is still practicable at a floodplain/wetland site considering the exposure to flood risk and ensuing disruption of natural values.

☒**YES** ☐**NO** The floodplain/wetlands site is the only practicable alternative.

☒**YES** ☐**NO** There is no potential for limiting the action to increase the practicability of previously rejected non-floodplain/wetlands sites and alternative actions.

☒**YES** ☐**NO** Minimization of harm to or within the floodplain/wetlands can be achieved using all practicable means.

☒**YES** ☐**NO** The action in a floodplain/wetland clearly outweighs the requirement of E.O. 11988/11990.

FEMA shall not act in a floodplain/wetland unless it is the only practicable location.

STEP NO. 7 **Prepare and provide the public with a finding and public explanation of any final decision that the floodplain/wetland is the only practicable alternative; and (44 CFR §9.12)**

☐ Check if the Initial Public Notice serves as the Final Public Notice or a Cumulative Final Public Notice was published. No condition required.

☒ Check if the condition was added to the EA indicating that "For actions located in the floodplain and/or wetlands, the applicant must issue a final public notice per 44 CFR Part 9.12(e) at least 15 days prior to the start of work. The final notice shall include the following: (1) A statement of why the proposed action must be located in an area affecting or affected by a floodplain or a wetland; (2) A description of all significant facts considered in making this determination; (3) A list of the alternatives considered; (4) A statement indicating whether the action conforms to applicable state and local floodplain protection standards; (5) A statement indicating how the action affects or is affected by the floodplain and/or wetland, and how mitigation is to be achieved; (6) Identification of the responsible official or organization for implementation and monitoring of the proposed action, and from whom further information can be obtained; and (7) A map of the area or a statement that such map is available for public inspection, including the location at which such map may be inspected and a telephone number to call for information.

STEP NO. 8 **Review the implementation and post - implementation phases of the proposed action to ensure that the requirements stated in Section 9.11 are fully implemented. Oversight responsibility shall be integrated into existing processes. (44 CFR §9.11)**

☒**YES** ☐**NO** Was Grant conditioned on review of implementation and post-implementation phases to ensure compliance of EO 11988?

Failure to comply with conditions enumerated in the Record of Environmental Consideration may jeopardize federal funding.

APPENDIX 4

US FISH AND WILDLIFE SERVICE CORRESPONDENCE

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Louisiana Ecological Services Field Office
200 Dulles Drive
Lafayette, LA 70506
Phone: (337) 291-3100 Fax: (337) 291-3139

In Reply Refer To: 10/07/2024 17:44:37 UTC
Project code: 2025-0002630
Project Name: Construction of Lacache Middle School New Campus

Subject: Consistency letter for the project named 'Construction of Lacache Middle School New Campus' for specified threatened and endangered species that may occur in your proposed project location pursuant to the Louisiana Endangered Species Act project review and guidance for other federal trust resources determination key (Louisiana DKey).

Dear Kristiaan Stuart:

The U.S. Fish and Wildlife Service (Service) received on October 07, 2024 your effects determination(s) for the 'Construction of Lacache Middle School New Campus' (the Action) using the Louisiana DKey within the Information for Planning and Consultation (IPaC) system. The Service developed this system in accordance with the Endangered Species Act of 1973 (ESA) (87 Stat.884, as amended; 16 U.S.C. 1531 et seq.).

Based on your answers, and the assistance in the Service's Louisiana DKey, you made the following effect determination(s) for the proposed Action:

Species	Listing Status	Determination
West Indian Manatee (*Trichechus manatus*)	Threatened	No effect

Your agency has met consultation requirements for these species by informing the Service of the "no effect" determinations. No further consultation for this project is required for these species. This consistency letter confirms you may rely on effect determinations you reached by considering the Louisiana DKey to satisfy agency consultation requirements under Section 7(a)(2) of the Endangered Species Act of 1973 (87 Stat. 884, as amended 16 U.S.C. 1531 et seq.; ESA).

The Service recommends that your agency contact the Service or re-evaluate the project in IPaC if: 1) the scope or location of the proposed project is changed significantly, 2) new information reveals that the action may affect listed species or designated critical habitat; 3) the action is modified in a manner that causes effects to listed species or designated critical habitat; or 4) a new species is listed or critical habitat designated. If any of the above conditions occurs,

additional consultation should take place before project changes are final or resources committed.

This IPaC-generated letter only applies to the species in the above table and **does not** apply to the following ESA-protected species that also may occur in the Action Area:

- Alligator Snapping Turtle *Macrochelys temminckii* Proposed Threatened
- Monarch Butterfly *Danaus plexippus* Candidate
- Tricolored Bat *Perimyotis subflavus* Proposed Endangered

Please Note: If the Federal Action may impact bald or golden eagles, additional coordination with the Service under the Bald and Golden Eagle Protection Act (BGEPA) (54 Stat. 250, as amended, 16 U.S.C. 668a-d) may be required. Please contact Ulgonda Kirkpatrick (phone: 321/972-9089, e-mail: ulgonda_kirkpatrick@fws.gov) with any questions regarding potential impacts to bald or golden eagles.

Action Description
You provided to IPaC the following name and description for the subject Action.

1. Name

Construction of Lacache Middle School New Campus

2. Description

The following description was provided for the project 'Construction of Lacache Middle School New Campus':

> Proposed location of new middle school is located immediately adjacent to the existing South Terrebonne High School. Approximate area of new middle school is 8 acres. Applicant would like to issue an NTP by March of 2025.

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@29.566029200000003,-90.64283441281344,14z

QUALIFICATION INTERVIEW

1. Is the action authorized, funded, or being carried out by a Federal agency?

   Yes

2. Is the action authorized, funded, or being carried out by the:

   b. Federal Emergency Management Agency (FEMA)

3. Please identify your agency or organization type:

   a. Federal agency

4. Have you determined that the project will have "no effect" on federally listed species? (If unsure select "No")

   No

5. [Hidden Semantic] Does the project intersect the west indian manatee AOI?

   Automatically answered
   Yes

6. (Semantic) Is the project located within the manatee consultation zone, excluding the Mississippi River?

   Automatically answered
   Yes

7. Is the project footprint entirely on land?

   Yes

8. [Hidden Semantic] Does the project intersect the pink mucket mussel AOI ?

   Automatically answered
   No

9. (Semantic) Does the project intersect the Louisiana black bear Range?

   Automatically answered
   No

IPAC USER CONTACT INFORMATION

Agency: Department of Homeland Security
Name: Kristiaan Stuart
Address: 1500 Main Street
City: Baton Rouge
State: LA
Zip: 70802
Email kristiaan.stuart@associates.fema.dhs.gov
Phone: 2256100860

APPENDIX 5

LA DEPARTMENT OF WILDLIFE AND FISHERIES, WILDLIFE DIVERSITY PROGRAM CORRESPONDENCE

JEFF LANDRY
GOVERNOR

MADISON D. SHEAHAN
SECRETARY

PO BOX 98000 | BATON ROUGE LA | 70898

Date	August 23, 2024
Name	Kristiaan Stuart
Company	FEMA
Street Address	1500 Main Street
City, State Zip	Baton Rouge, LA 70802
Project	South Terrebonne Middle School FEMA Public Assistance Program, FEMA-DR-4611-LA
Project ID	
Invoice Number	24082313

Personnel of the Louisiana Wildlife Diversity Program (WDP) have reviewed the preliminary data for the captioned project. After careful review of our database, no impacts to rare, threatened, or endangered species or critical habitats are anticipated for the proposed project. No state wildlife refuges or wildlife management areas are known to occur at the specified site within Louisiana's boundaries.

The Wildlife Diversity Program (WDP) has compiled data on rare, endangered, or otherwise significant plant and animal species, plant communities, and other natural features throughout the state of Louisiana. WDP reports summarize the existing information known at the time of the request regarding the location in question. The quantity and quality of data collected by the WDP are dependent on the research and observations of many individuals. In most cases, this information is not the result of comprehensive or site-specific field surveys; many natural areas in Louisiana have not been surveyed. This report does not address the occurrence of wetlands at the site in question. WDP reports should not be considered final statements on the biological elements or areas being considered, nor should they be substituted for on-site surveys required for environmental assessments. WDP requires that this office be acknowledged in all reports as the source of all data provided here. If at any time WDP tracked species are encountered within the project area, please contact the WDP Data Manager at 225-763-3554. If you have any questions, or need additional information, please call 337-735-8734.

Sincerely,

for Carolyn Michon

Nicole Lorenz, Program Manager
Wildlife Diversity Program

APPENDIX 6

STATE HISTORIC PRESERVATION OFFICE CONCURRENCE

No known historic properties will be affected by this undertaking. Therefore, our office has no objection to the implementation of this project. This effect determination could change should new information come to our attention.

Carrie Broussard

Carrie Broussard
State Historic Preservation Officer

Date 10/30/2024

U.S. Department of Homeland Security
Federal Emergency Management Agency
Louisiana Integration and Recovery Office
1500 Main Street
Baton Rouge, LA 70802

FEMA

October 1, 2024

Carrie Broussard
Deputy State Historic Preservation Officer
Department of Culture, Recreation & Tourism
1051 North Third Street
Baton Rouge, LA 70802

RE: **Section 106 Review Consultation, Hurricane Ida, FEMA-4611-DR-LA**
Terrebonne Parish School Board, Construction Lacache Middle School New Campus (29.565565, -90.643892), 3858 Highway 24, Bourg, Terrebonne Parish, Louisiana 70343 (AIDB 3143/GM#s 675320,673889,666945)
Determination: No Historic Properties Affected

Dear Ms. Broussard:

The Federal Emergency Management Agency (FEMA) will be providing funds authorized under the Robert T. Stafford Disaster Relief and Emergency Assistance Act, P.L. 93-288, as amended, in response to Disaster Declaration FEMA-4611-DR-LA for Hurricane Ida, dated August 29, 2021, as amended. FEMA is initiating Section 106 review for the above referenced project in accordance with the *Programmatic Agreement among the Federal Emergency Management Agency, the Louisiana State Historic Preservation Officer, the Governor's Office of Homeland Security and Emergency Preparedness, and Participating Tribes,* executed on March 11, 2024 (2024 Statewide PA).

FEMA, through its Public Assistance Program, proposes to provide funds to the Terrebonne Parish School Board (Subrecipient) to construct a new replacement campus for Lacache Middle School (Undertaking) at a vacant parcel of land located north-west of the South Terrebonne High School at 3858 Highway 24, Bourg, Terrebonne Parish, Louisiana (Figure 1).

Preliminary plans for the project involve significant ground disturbance and may include land clearing, grubbing, leveling, and the construction of buildings, sidewalks, parking areas, athletic fields, and associated infrastructure. The work may also include the driving new pilings for foundation support, installation underground utilities and infrastructure, as well as adding site fencings, lighting, and signage.

FEMA has determined that the Area of Potential Effect (APE) for the proposed Undertaking is the entire large, grassy field adjacent to the Terrebonne High School, extending north, northeast, of Park Ave (LA HWY-24W), measuring a maximum length of 468 m (1,535 ft) and a maximum width of 269 m (833 ft) for a total of 12.1 ha (30 acres) (Figure 2). In accordance with Stipulation II.C(2)(b)

APPENDIX 7

PUBLIC NOTICE OF AVAILABILITY

FEMA PUBLIC NOTICE OF AVAILABILITY
DRAFT ENVIRONMENTAL ASSESSMENT AND
DRAFT FINDING OF NO SIGNIFICANT IMPACT
RELOCATION AND NEW CONSTRUCTION OF
SOUTH TERREBONNE MIDDLE SCHOOL

Interested parties are hereby notified that the Federal Emergency Management Agency (FEMA) prepared a Draft Environmental Assessment (EA) for the relocation and construction of facilities located at Lacache Middle School within Terrebonne Parish. The original Lacache Middle School facility is located at 5266 Highway 56, Chauvin, LA 70344 (29.457848, -90.590067). The proposed South Terrebonne Middle School (STMS) is located immediately adjacent and northwest of the existing South Terrebonne High School (STHS) at 3879 Highway 24, Bourg, LA 70343 (29.56427, -90.64006) approximately 10 miles north of the original location. The parcel is approximately 13.5 acres. The Subrecipient, Terrebonne Parish School District, seeks federal grant funds for this action eligible under a Presidential Disaster Declaration, signed on August 29, 2021 (FEMA-DR-4611-LA).

The need for this action is to relocate and newly construct storm-damaged school facilities and make the facilities more resilient against future storm events. Under the proposed preferred alternative, FEMA would provide funding for Lacache Middle School would be rebuilt at an alternate location adjacent to the existing STHS. Currently, and for the past year, the Lacache Middle School student body has been using two modular educational facilities with 12 classrooms each located in the eastern parking lot of the STHS location. This alternative includes demolition of the damaged facilities, construction of a two-story, two-winged, single-campus building with two adjoining parking areas with a gross area of 81,564 square feet. The proposed facility would have 32 standard classrooms; 2 physical education classrooms and supporting rooms for IT, band, resources, janitorial, and faculty; and a cafeteria and gymnasium.

Per the National Environmental Policy Act (42 U.S.C. 4371 *et seq.*), and associated environmental statutes, a Draft EA, has been prepared to evaluate the action's potential impacts on the human and natural environment. This Draft EA summarizes the purpose and need, site selection process, affected environment, and potential environmental consequences associated with the proposed action.

In accordance with NEPA, the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 Code of Federal Regulations (CFR) Parts 1500–1508), FEMA's Instruction 108-1-1 for implementing NEPA, the National Historic Preservation Act, Executive Order 11988, Executive Order 11990, and 44 CFR Part 9, a Draft EA was written to evaluate the potential impacts of the proposed action and alternatives on the human and natural environment. The draft EA evaluates Alternative 1, the No Action Alternative; Alternative 2, Rebuild Lacache Middle School at Original Site; Alternative 3, Rebuild Lacache Middle School at Alternate Location (Proposed Preferred Action).

This public notice will run in the journal of record for the State of Louisiana, *The Advocate*, and in the *The Courier* in Terrebonne Parish for five (5) Mondays: January 6, 13, 20, 27; and February 3, 2025. A copy of the draft Environmental Assessment is also available at the Terrebonne Parish School Board's Central Office Lobby.

The draft EA and draft FONSI are available for review at the following locations during business hours:

- Terrebonne Parish Library at 151 Library Drive, Houma, Louisiana 70360

The draft EA and draft FONSI can also be viewed and downloaded from FEMA's website at https://www.fema.gov/emergency-managers/practitioners/environmental-historic/nepa-repository.

A 30-day comment period will begin on ******* and conclude on ******* at 4:00 p.m. Written comments may be mailed to: DEPARTMENT OF HOMELAND SECURITY-FEMA EHP - "Terrebonne Parish School District South Terrebonne Middle School," 1500 Main Street, Baton Rouge, LA 70802. Comments may also be emailed to fema-liro-ehp-pa@fema.dhs.gov. If no substantive comments are received, the draft EA and associated draft FONSI will become final.

All other questions regarding disaster assistance should be directed to FEMA's Helpline at 1-800-621-3362 or visit www.DisasterAssistance.gov

Based on FEMA's findings to date, no significant adverse environmental effects are anticipated. However, if FEMA receives new information that results in a change from no adverse effects then FEMA would revise the findings and issue a second public notice allowing time for additional comments. However, if there are no changes, this Draft EA will become the Final EA.

If no substantive comments are received, the Draft EA and associated Finding of No Significant Impact (FONSI) will become final, and this initial Public Notice will also serve as the final Public Notice. Substantive comments will be addressed as appropriate in the final documents.

APPENDIX 8

DRAFT FINDING OF NO SIGNIFICANT IMPACT

FEDERAL EMERGENCY MANAGEMENT AGENCY
FINDING OF NO SIGNIFICANT IMPACT
RELOCATION AND NEW CONSTRUCTION OF
SOUTH TERREBONNE MIDDLE SCHOOL
TERREBONNE PARISH, LOUISIANA
FEMA-DR-4611-LA

BACKGROUND

Hurricane Ida made landfall on August 29, 2021, at Port Fourchon, Louisiana, as a Category 4 hurricane with sustained winds of more than 150 miles per hour and a minimum central pressure of 930 millibars. President Joseph Biden, Jr. declared a major disaster for the State of Louisiana (FEMA-DR-4611-LA) on August 29, 2021, 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.

Terrebonne Parish School District (TPSD) has submitted an application for Federal Emergency Management Agency (FEMA) grant funding under FEMA's Public Assistance Program being administered in response to FEMA-DR-4611-LA. Lacache Middle School in Chauvin, Louisiana, sustained severe damage to all of its main and ancillary structures. The school community was displaced at the start of the new school year. In response, temporary repairs and mold remediation were conducted to safely bring students back to the school by October of 2021. Students continued enrollment at Lacache Middle School until two temporary modular buildings, offering 12 classrooms each, were placed at the South Terrebonne High School (STHS) campus' east parking lot (29.563808, -90.639507) in August of 2023. The original Lacache Middle School facility is located at 5266 Highway 56, Chauvin, LA 70344 (29.457848, -90.590067). The proposed South Terrebonne Middle School (STMS) is located immediately adjacent and northwest of the existing STHS at 3879 Highway 24, Bourg, LA 70343 (29.56427, -90.64006) approximately 10 miles north of the original location. The parcel is approximately 13.5 acres. This alternative includes demolition of the damaged facilities, construction of a two-story, two-winged, single-campus building with two adjoining parking areas with a gross area of 81,564 square feet. The proposed facility would have 32 standard classrooms; 2 physical education classrooms and supporting rooms for IT, band, resources, janitorial, and faculty; and a cafeteria and gymnasium.

In accordance with the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 Code of Federal Regulations (CFR) Parts 1500–1508) and FEMA's Instruction 108-1-1 for implementing NEPA , an Environmental Assessment (EA) was prepared. The purpose of this EA is to analyze the potential environmental impacts associated with the change of location proposal and to determine whether to prepare an Environmental Impact Statement (EIS) or a Finding of No Significant Impact (FONSI).

Three project alternatives were considered in this DEA: Alternative 1, the No Action Alternative; Alternative 2, Rebuild Lacache Middle School at Original Site; Alternative 3, Rebuild Lacache Middle School at Alternate Location (Proposed Preferred Action).

FINDING OF NO SIGNIFICANT IMPACT

The Proposed Action would not result in any significant adverse impacts related to wildlife, state and federally listed threatened and endangered species, and hazardous materials. The Proposed Action as described in the DEA may have short-term, temporary, negligible to minor impacts to geology, topography, soils, wetlands and waters of the U.S., floodplains and hydrology, water quality and resources, land use and planning, air quality, cultural resources, low income and minority populations, noise, and traffic. The Proposed Action may have long-term, permanent, negligible to minor impacts to socioeconomics, water resources and quality through a temporary increase in suspended solids through stormwater runoff during and after construction. Based on the information analyzed, FEMA has determined that the implementation of the proposed action would not result in significant adverse impacts to the quality of the natural and human environment. The proposed action is not anticipated to have the potential for significant cumulative effects when combined with past, present, and reasonably foreseeable future actions. As a result of this FONSI, an EIS will not be prepared and the proposed action as described in the EA may proceed. All adverse impacts require conditions to minimize or mitigate impacts to the proposed project site and surrounding areas.

CONDITIONS

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

- 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 minimize the disturbed area and preserve the existing vegetation, while also maintaining topsoil whenever possible.

- 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 demolition 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.

- The subrecipient is required to plant two trees for every tree removed, should tree removal be necessary.

- The contractor will avoid the western tree line and associated wetland extending to Bayou Terrebonne. If necessary, any encroachment into waters of the United States will first require an aquatic resources delineation (wetland delineation) and an appropriate Clean Water Act permit issued by the US Army Corps of Engineers.

- 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.

- To ensure the site is free of hazardous materials, contamination, toxic chemicals, gases and radioactive substances where the hazard could affect the health and safety of occupants or conflict with the intended utilization of the property a Phase I Environmental Site Assessment is required before initiating work.

- Terrebonne Parish Code of Ordinances (Section 14-200) and defined as in Section 14-26, has made “excessive noises” pertaining to residences, commercial structures, and domestic animals unlawful. Excessive noises pertaining to any commercial structures, means sound produced by radio, television, loudspeakers, musical equipment or devices, within the interior or on the exterior of commercial buildings, which is audible at a distance of seven and one-half (7.5) meters (twenty-five (25) feet) or exceeds seventy (70) decibels in volume. Excessive noises pertaining to motor vehicles, means sound produced by radio, television,

loudspeakers, musical equipment or devices, within the interior or on the exterior of motor vehicles, which is audible at a distance of seven and one-half meters (7.5) (twenty-five (25) feet) or exceeds seventy (70) decibels in volume.

- 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.

- Subrecipient is required to design and construct project to V-zone standards in accordance with American Society of Civil Engineers (ASCE) standard 24-14, Flood Resistant Design and Construction, or latest edition, must coordinate with the local floodplain administrator to obtain required permits prior to initiating work, and comply with any conditions of the permit to ensure harm to the floodplain is minimized. 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 subrecipient 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 Stat. Preservation Officer (SHPO) and any other relevant parties.

- Bald Eagles 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 their preservation, the USFWS 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.

PUBLIC REVIEW AND COMMENT

The EA can be viewed and downloaded from FEMA's website at https://www.fema.gov/emergency-managers/practitioners/environmental-historic/nepa-repository. The EA was also available for public review at the Terrebonne Parish Library at 151 Library Drive, Houma, Louisiana 70360. A legal notice was posted in The Courier and The Advocate on Monday, January 6 through Monday, February 3, 2025. No substantive comments were received; therefore, the Draft EA will become final and the initial Public Notice will also serve as the final Public Notice.

APPROVAL AND ENDORSEMENT

_____ Date _____

Latoya Leger
Regional Environmental Officer
Louisiana Integration and Recovery Office (LIRO)

_____ Date _____

Arsany Thomas
Recovery Division Director
FEMA Region 6