

Draft Environmental Assessment
**2519 W Park Ave Group
Housing Site (TR-10)**

FEMA-4611-DR-LA

Gray, Terrebonne Parish, Louisiana

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FEMA

**U.S. Department of Homeland Security
Federal Emergency Management Agency, Region 6
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ACRONYMS AND ABBREVIATIONS

ACS	American Community Survey
APE	Area of Potential Effect
BFE	Base Flood Elevation
BMP	Best Management Practices
CAP	Corrective Action Plan
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CFR	Code of Federal Regulations
CUP	Coastal Use Permit
CWA	Clean Water Act
CZMA	Coastal Zone Management Act
EA	Environmental Assessment
EDMS	Electronic Document Management System
EIS	Environmental Impact Statement
EO	Executive Order
EPA	United States Environmental Protection Agency
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FONSI	Finding of No Significant Impact
FPPA	Farmland Protection Policy Act
GOHSEP	Governor's Office of Homeland Security and Emergency Preparedness
GSA	General Services Administration
HMA	Hazard Mitigation Assistance
IA	Individual Assistance
IHP	Individuals and Households Program
LCRP	Louisiana Coastal Resources Program
LDEQ	Louisiana Department of Environmental Quality
LDNR	Louisiana Department of Natural Resources
LDOTD	Louisiana Department of Transportation and Development
LPDES	Louisiana Pollutant Discharge Elimination System
MHU	Manufactured Housing Unit
MLR	Multi-Family Lease and Repair Program
MSA	Magnuson-Stevens Fishery Conservation and Management Act
NCS	Non-Congregate Sheltering
NEPA	National Environmental Policy Act
NFA	No Further Action
NFA-ATT	No Further Action at This Time
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service
NOAA	National Oceanic Atmospheric Administration
NPL	National Priorities List
NPDES	National Pollution Discharge Elimination System
NRHP	National Register of Historic Places
NRCS	National Resources Conservation Service
NWI	National Wetlands Inventory

OCM	Office of Coastal Management
OSHA	Occupational Safety and Health Administration
P&A	Plugged and Abandoned
PA	Public Assistance
RCRA	Resource Conservation and Recovery Act
SDWA	Safe Drinking Water Act
SEMS	Superfund Enterprise Management System
SFHA	Special Flood Hazard Area
SHPO	State Historic Preservation Office
SSA	Sole Source Aquifer
SWPPP	Storm Water Pollution Prevention Plan
TDML	Total Daily Maximum Load
TSCA	Toxic Substances Control Act
TTHU	Transportable Temporary Housing Unit
UFAS	Uniform Federal Accessibility Standard
USACE	United States Army Corps of Engineers
USCB	United States Census Bureau
USFWS	United States Fish and Wildlife Service
UST	Underground Storage Tank
USTD	Underground Storage Tank Division

1.0 INTRODUCTION

The President of the United States issued a Major Disaster Declaration for Hurricane Ida (DR-4611-LA) on August 29, 2021 and amended September 7, 2021 and September 13, 2021. This Declaration authorized the Department of Homeland Security's Federal Emergency Management Agency (FEMA) to provide federal assistance under Section 408 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), Public Law No. 93-288, as amended in designated areas of Louisiana impacted by the hurricanes. Under this authority FEMA may provide direct temporary housing when there is a lack of available housing resources for eligible disaster victims whose homes are uninhabitable or destroyed as a result of the declared event.

To provide temporary housing solutions for survivors of Hurricane Ida, the State of Louisiana (Recipient and Applicant) requested assistance from FEMA in the form of Direct Temporary Housing (Direct Housing or Housing Assistance) through the Individuals and Households Program (IHP) for DR-4611-LA. FEMA authorized Housing Assistance for a period of up to 18 months for the following parishes for Hurricane Ida: Jefferson, Lafourche, Livingston, Plaquemines, St. Charles, St. Helena, St. James, St. John the Baptist, Tangipahoa and Terrebonne. FEMA's Direct Housing involves a variety of temporary housing solutions, including the Multi-Family Lease and Repair Program (MLR) Direct Lease, and distribution of Transportable Temporary Housing Units (TTHUs) on private residential lots or commercial lots. If existing private residential or commercial lots do not meet the need for TTHU placement, FEMA may construct Group Housing sites on undeveloped land to include build out of TTHU pads, ingress, egress, and utility connections.

This Draft Environmental Assessment (EA) has been prepared in accordance with the National Environmental Policy Act (NEPA) of 1969, the President's Council on Environmental Quality regulations to implement NEPA (40 CFR Parts 1500-1508), and FEMA's procedures for implementing NEPA (FEMA Instruction 108-1-1). FEMA is required to consider potential environmental impacts before funding or approving actions and projects. This Draft EA will analyze the potential environmental impacts of the proposed temporary group housing, 2519 W Park Ave Group Housing Site, as part of an expedited review process. FEMA will use the findings in this EA to determine whether to prepare an Environmental Impact Statement (EIS) or a Finding of No Significant Impact (FONSI).

2.0 PURPOSE AND NEED

Catastrophic damage from severe storms and flooding resulted in an extraordinary demand for housing assistance in communities within the parishes of Jefferson, Lafourche, Livingston, Plaquemines, St. Charles, St. Helena, St. James, St. John the Baptist, Tangipahoa and Terrebonne. FEMA's standard housing solutions such as MLR, NCS, Direct Lease, and individual TTHUs placed on the private lot of individual survivors, or grouped onto commercial sites equipped to support them, while critical to the success of the housing mission, cannot meet the entirety of the need within the parishes of Jefferson, Lafourche, Livingston, Plaquemines, St. Charles, St. Helena,

St. James, St. John the Baptist, Tangipahoa and Terrebonne. To address the gap in housing assistance, the Stafford Act Section 408 and 44 CFR § 206.117 provides housing assistance to eligible individuals and households who have been devastated by a major disaster or emergency. FEMA intends to pursue the development of TTHU Group Sites on previously undeveloped land or undeveloped lots for DR-4611-LA.

Providing housing resources for survivors of Hurricane Ida is a priority of FEMA's recovery mission. As of April 21, 2022, based on applicant call outs, FEMA estimates that approximately 556 households will require direct temporary housing assistance in Terrebonne Parish. While approximately half of this need has been met with private and commercial sites, there remains a need for 302 additional MHU units.

While the Direct Housing Task Force is also actively soliciting properties for Direct Lease and MLR, FEMA anticipates very few properties will be available. The low number of feasible private and commercial sites, MLR, and Direct Lease properties, is insufficient to meet the need for direct temporary housing in Terrebonne Parish. The decision to develop Group Sites is made only after all other housing solutions have been exhausted and the housing needs remain. The development of the 2519 W Park Ave Group Group Site would alleviate the need for approximately 86 housing units in Terrebonne Parish.

3.0 ENVIRONMENTAL REVIEW PROCESS

In order to meet the urgent needs of disaster survivors requiring temporary housing, FEMA has implemented an expedited environmental review process. The purpose of this document is to assist FEMA in fulfilling its environmental review responsibilities under NEPA and to serve as a vehicle to document compliance under other applicable environmental and historic laws and orders. Laws and orders addressed through this Draft EA include: the Clean Air Act; Clean Water Act (CWA); Endangered Species Act; National Draft Historic Preservation Act (NHPA); Executive Order (EO) 11988 (Floodplain Management); EO 11990 (Protection of Wetlands); EO 12898 (Environmental Justice); Comprehensive Environmental Response, Compensation and Liability Act (CERCLA); Resource Conservation and Recovery Act (RCRA); and Farmland Protection Policy Act (FPPA). Agency coordination/consultation is being conducted on a site-by-site basis as necessary.

The scope of FEMA's environmental review includes evaluating project alternatives, characterizing the affected environment, identifying potential environmental impacts, and outlining ways to avoid, reduce or minimize adverse effects. This Draft EA examines the site-specific environmental impacts associated with constructing a proposed FEMA group-housing site on private or publicly owned land to be leased by the General Services Administration (GSA) for this purpose. This Draft EA was prepared based on a site evaluation, document research, and resource agency information.

4.0 SITE SELECTION PROCESS AND ALTERNATIVES

NEPA requires investigation and evaluation of reasonable project alternatives as part of the project environmental review process. At a minimum, FEMA's NEPA implementing regulations require that the No Action and Proposed Action be evaluated. In order to expedite the group housing site selection process, FEMA is working closely with local officials and the United States Army Corps of Engineers (USACE) to identify potential sites, followed by site reconnaissance and research to determine site suitability. Important factors considered in choosing a site include: demand for temporary housing in that area, group acceptance, proximity of group services/amenities (schools, healthcare facilities, public transportation, etc.), engineering and construction feasibility, access to utilities, land use compatibilities, property owner terms, costs to develop and maintain the site, and environmental/cultural resource sensitivities. FEMA will continue to evaluate alternative sites in Terrebonne Parish. The 2519 W Park Ave Group Site was selected for further detailed analysis because it meets the basic site feasibility and selection criteria.

Alternative 1 – No Action Alternative

Under the No Action Alternative, FEMA would not develop a temporary group housing site at this location. Displaced residents would continue to stay with relatives/friends, in hotels, or in other temporary locations until they resolve their own long-term housing needs. This alternative may jeopardize public health, safety, and well-being and does not meet the purpose and need, but will continue to be evaluated throughout this Draft EA and serve as a baseline comparison of impacts from other action alternatives. The future environmental condition of the site would be at the discretion of the property owner.

Alternative 2 – Develop the 2519 W Park Ave Group Site with MHUs (Proposed Action)

The Proposed Action would provide temporary housing for eligible disaster survivors displaced by flooding. Disaster survivors would be temporarily relocated to the site with an expected occupancy up to 18 months (which includes a site deactivation period) while they resolve their permanent housing needs. This alternative would assist in fulfilling FEMA's mandate under the Individuals and Households Program (IHP) to expeditiously provide temporary housing for eligible disaster survivors. This alternative would also address the proposed project's purpose and need as it satisfies the housing needs for those survivors for whom other types of direct housing options are not available.

4.1 Project Site and Location Description

The project site is located at 2519 W Park Ave, Louisiana 70359 (Latitude: 29.714801, Longitude: -90.791773). Figure 1 is an aerial photo depicting the boundaries of the project site and adjacent area. The site is located east of west park ave and north of Hwy 316. Approximately 16.31 acres would be developed. The site consists of flat grass and an underground gas line running through the middle of the property. There is also a caged gas pipeline valve station in the southwest portion of the site. A mobile home park (Als Trailer Park) is approximately half a mile to the southwest, open grass fields border the north, wooded wetlands borders the east and south borders, and

Labland Brothers Ready mix and Ramco borders the western portion of the site . A small single house, residential neighborhood, elementary school, gas station/convenience stores, auto repair shop, are located north. Highway 24 (West Main St.) is adjacent to the west of the site respectively.

The site is leveled throughout at approximately 8.7 feet above sea level. The surrounding topography is at an elevation of 5 to 9 feet above sea level. Bayou Terrebonne is approximately 831 feet to the west of the site. There will be a total of 86 Transportable Temporary Housing units (TTHUs) being placed outside of the Special Flood Hazard Area (SFHA).

4.2 Proposed Action Description

The Proposed Action would utilize the project site and design to contract for the construction of approximately 86 TTHU pads, green space, and all necessary support facilities (Figure #2). These pads would be used for the placement of MHUs to house displaced families.

The development of the site would require the installation of utilities on the site; gravel for the roads, trailer pads and resident parking; concrete for disabled American with Disability Act (ADA) compliant parking areas; site lighting; and a perimeter fence around the property. The exact depth of excavation and grading would likely not exceed 3.5 feet for utility trenching and 7.5 feet for the sewage wet pumps.

The following specific site development components would be included with this project:

- Site preparation would include clearing, grading, and removal of woody vegetation and deb
- Infrastructure for public water and electrical services exist off West Park Ave. but would have to be extended onto the site.
- Infrastructure for sewer would consist of a packaged sewage treatment plant on site.
- New lines and fire hydrants, as required, would be installed on the property.
- Storm water drainage would be developed within the site.
- Site features include approximately 15% of the units meeting Uniform Federal Accessibility Standard (UFAS), and 100% of on-site essential services/facilities (such as mailbox kiosk) would be UFAS compatible.
- Erosion control would be established during the construction period and a perimeter fence would be constructed around the project site.

FEMA would operate and maintain the site during the term of occupancy. When the temporary housing need has ended, FEMA expects that the MHUs would be hauled from the site and returned to a FEMA storage facility. The project site would be reasonably restored to its previous condition and then seeded or left per the lease terms with the landowner.

5.0 AFFECTED ENVIRONMENT AND POTENTIAL IMPACTS

This section is organized by individual resources. It includes a description of the existing conditions at the project area and provides an analysis of potential environmental impacts for each alternative. Impacts to the following resources as a result of the Proposed Action were found to be discountable and are not evaluated further in this Draft EA: geology, seismicity, air quality, climate change, wildlife and fish, noise, public service and utilities, and public health and safety. Where potential impacts exist, conditions or mitigation measures to offset these impacts are detailed. Table 3 summarizes the results of the environmental review process. No safety issues were identified on the project site.

5.1 Soils

In 1981 Congress passed the Agriculture and Food Act of 1981 (P.L. 97-98) containing Farmland Protection Policy Act (FPPA) subtitle I of Title XV, Section 1539-1549. The final rules and regulations were published in the Federal Register on June 17, 1994. The FPPA is intended to minimize the impact Federal programs have on the unnecessary and irreversible conversion of farmland to nonagricultural uses. It ensures that to the extent possible, Federal programs are administered to be compatible with state and local units of government, as well as private programs and policies to protect farmland. The FPPA does not authorize the federal government to regulate the use of private or non-federal land or in any way affect the property rights of owners. As detailed in the 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.

There is one (1) type of soil present on the site, Schriever clay. This soil component, which is identified as a clay, belongs to the hydrological group Class D. Class D has very slow infiltration rates. This type of soil is clayey, have a high water table or are shallow to an impervious layer. Soil drainage is defined as poorly drained. Additionally this type of soil has 0 to 1 percent slopes, and occasionally flooded. This soil does not identify prime farmland.

Alternative 1- No Action Alternative

The No Action Alternative would not entail any construction activities; therefore, no adverse impacts to soils would occur as a result of no federal actions.

Alternative 2 - Develop the 2519 W Park Ave Group Site with MHUs (Proposed Action)

The soil at the 2519 W Park Ave Group Site is not considered prime farmland. FEMA completed the Site Assessment Criteria (Part VI) of the National Resources Conservation Service (NRCS) AD 1006 Farmland Impact Conversion Rating form by utilizing criteria explained in 7 CFR § 658.5(b). FEMA's Total Site Assessment points (Part VI in the AD 1006 Form) of 4 is based on the following categories: Area in Non-urban Use (2 out of 15); Perimeter in Non-urban Use (2 out of 10); Percent of Site Being Farmed (0 out of 20); Protection Provided by State and Local Government. (0 out of 20); Distance from Urban Build-up Area (0 out of 15); Distance to Urban

Support Services (0 out of 15); Size of Present Farmland Unit Compared to Average (0 out of 10); Creation of Non-farmable Farmland (0 out of 10); Availability of Farm Support Services (0 out of 5); On-Farm Investments (0 out of 20); Effects of Conversion on Farm Support Services (0 out of 10); and Compatibility with Existing Agricultural Use (0 out of 10). Total Site Assessment points (Part VI in the AD 1006 Form) less than 160 indicates a site need not be given further consideration for FPPA protection (per 7 CFR § 658.4(c)(3)).

According to Web Soils Survey accessed on April 26,2022, there is approximately 0 acres of prime farmlands soils within the proposed site. Therefore, no prime farmland soil would be affected by the development of this site. The Proposed Action must comply with the mitigation measures discussed in Section 7 of this Draft EA to address requirements of the Louisiana Department of Environmental Quality (LDEQ) to observe precautions to control non-point source pollution, reduce erosion, and develop a Storm Water Pollution Prevention Plan (SWPPP) and implement the required conditions.

5.2 Water Resources

This section provides an overview of the affected area and potential environmental effects of the No Action and Proposed Action Alternatives on water resources, including water quality, streams, wetlands, and floodplains.

5.2.1 Water Quality

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

The National Pollutant Discharge Elimination System (NPDES) was created by Section 402 of the CWA. This program authorizes the United States Environmental Protection Agency (EPA) to issue permits for the point-source discharge of pollutants into waters of the United States (U.S.) Through a 2004 Memorandum of Agreement, the EPA delegated its permit program for the State of Louisiana to LDEQ. The ensuing Louisiana Pollutant Discharge Elimination System (LPDES) program authorizes individual permits, general permits, storm water permits, and pretreatment activities that result in discharges to jurisdictional waters of the state.

Impaired Waterbodies

Impaired waterbodies and streams are on the Louisiana CWA 303(d) list and are required to develop a total maximum daily load (TMDL). TMDLs are maximum amounts of pollutants that can be released in a waterbody or stream without causing the water to become impaired (violate state water quality standards). TMDL for Dissolved Oxygen from discharges from municipal

separate storm sewer systems and also introduction of non-native organisms (accidental or intentional) has been established for Saint Louis Bayou, which flows to the Intercoastal Waterways to Larose. TMDL requirements are established in NPDES permits and through Best Management Practices (BMPs). BMPs are types of activities that are created to control or minimize pollutants from an area to water bodies of the state.

Alternative 1- No Action Alternative

The No Action Alternative would have no impact on water quality as a result of no federal actions.

Alternative 2 - Develop the 2519 W Park Ave Group Site with MHUs (Proposed Action)

Under the Proposed Action Alternative, impacts to water quality, if any, would be minor. Appropriate best management practices (BMPs) will be implemented during site development to minimize sediment migration from the site into nearby water bodies. Surface runoff will be controlled by using siltation controls such as silt fencing around the construction site to minimize erosion of materials into adjacent wetlands and/or waterways. Any disturbed soil will be protected with seed or sod after construction in order to decrease the amount of soil eroded by rainfall and runoff. Any fill stored on site will be appropriately covered to prevent erosion.

In accordance with Section 401 and 402 of the CWA and the Louisiana Clean Water Code, coverage under the LPDES Storm Water General Permit for Large Construction Activities (greater than 5 acres) will be obtained for 4534 Rural Retreat Group Housing Site construction activities. Coverage under the LPDES Storm Water General Permit for Large Construction Activities will implement a SWPPP that will meet the requirements of approved TMDLs for Bayou Terrebonne.

Contractors shall comply with state and federal regulations for the point source pollutants created by packaging plants into surface water to also include existing streams.

The 2519 W Park Ave Group Housing Site is located within 5.0 miles of Saint Louis Bayou, impaired waters which are waterbodies or streams that are too polluted or otherwise degraded to meet the water quality standards set by states, territories, or authorized tribes. These actions would prevent any degradation of water quality from the construction and operational discharges. The Proposed Action Alternative would have no significant impacts to water quality in the area of the site.

5.2.2 Wetlands

Wetlands are defined as “those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated conditions. Wetlands generally include swamps, marshes, bogs, and similar areas”. Wildlife rely on wetlands for food and as a nursery. Wetlands filter pollutants from water, recharge groundwater, moderate climate change, and reduce drought effects and flood damage.

Wetlands and/or streams are protected under various Federal and state environmental laws. The primary laws and regulations are Section 404 of the Clean Water Act and Presidential Executive Order 11990. Section 404 of the CWA regulates the discharge of dredged or fill material into waters of the US (including wetlands). Executive Order 11990 requires federal agencies to avoid to the extent possible the long- and short-term adverse impacts associated with the destruction or modification of wetlands where there is a practicable alternative.

This section also addresses regulated streams (non-wetland waters) that are subject to jurisdiction under Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act.

Alternative 1- No Action Alternative

The No Action Alternative would have no impact on wetlands or other waters of the US and would not require permits under Section 404 of the CWA or Section 10 of the Rivers and Harbors Act.

Alternative 2 - Develop the 2519 W Park Ave Group Site with MHUs (Proposed Action)

The proposed project site is on a 16.31 acre property located at 2519 West Park Avenue in Gray, LA. This property is vacant and the owner appears to have let the land lie fallow. The proposed group housing site is part of an approximately 566-acre tract of land which was delineated for regulated waters and wetlands by the US Army Corps of Engineers, New Orleans District (USACE) on September 14, 2018, for another permit applicant. By letter dated October 5, 2018, the USACE found that sections of the 566-acre lot contained regulated wetlands and waters of the US (Saint Louis Bayou and Bayou Blue and tributaries) which are subject to jurisdiction under Section 404 of the Clean Water Act. A map was attached to the letter detailing the jurisdictional limits of these regulated waters and wetlands. The footprint of the 16.31-acre proposed temporary group housing site was superimposed on the jurisdictional attachment on April 14, 2022, by FEMA staff and clearly showed the proposed project avoids regulated waters and wetlands. The 2018 jurisdictional determination expires on October 5, 2023. The above information was confirmed by letter dated April 15, 2022, (Attachment 2) from the USACE stating the proposed project, as submitted, will not require a Department of the Army permit under Section 404 of the Clean water Act or Section 10 of the Rivers and Harbors Act.

In summary, no regulated wetlands or streams will be impacted by the Proposed Action Alternative.

5.2.3 Ground Water

A Sole Source Aquifer (SSA) is an underground water source that has been designated by the EPA as the sole or principal source of drinking water for an area. By definition, SSA is an aquifer that supplies at least 50% of the drinking water consumed in the area overlying the aquifer.

The SSA Program is authorized by Section 1424(e) of the Safe Drinking Water Act (SDWA) of 1974. Designation of an aquifer as a SSA provides EPA with the authority to review federal financially assisted projects planned for the area to determine their potential for contaminating the

aquifer. This provides essential groundwater protection to ensure the storage, handling, or use of fertilizers, pesticides, or hazardous products do not pollute an SSA.

Federally funded projects reviewed by EPA under the SSA Program may include, but are not limited to, highway improvements and new road construction, public water supply wells, transmission lines, wastewater treatment facilities, construction projects involving disposal of storm water, and agricultural projects involving management of animal waste.

Alternative 1- No Action Alternative

No impacts to groundwater would occur as a result of no federal actions.

Alternative 2 - Develop the 2519 W Park Ave Group Site with MHUs (Proposed Action)

A review of the website <https://www.epa.gov/dwssa/map-sole-source-aquifer-locations> with plot coordinates for the 2519 W Park Ave Group Site, on April 22, 2022, revealed that there are no identified sole source aquifers on this site.

The primary sources of groundwater in Terrebonne Parish include the Mississippi River alluvial aquifer system. The Mississippi River alluvial aquifer contains saltwater throughout Terrebonne Parish. It is composed of fine to medium sand at the top of the aquifer, which grades to coarse sand and gravel in the lower part. Overlying the alluvial aquifer is a clayey surface. The base of the aquifer ranges from 75 to 425 feet. The aquifer discharges into rivers, canals, and lakes, and is also withdrawn by wells.

The primary source of fresh water in Terrebonne Parish is the Gulf Intracoastal Waterway and Bayou Lafourche, which is supplied with water from the Mississippi River at Donaldsonville LA. In 2010, Gulf Intracoastal Waterway and Bayou Lafourche accounted for about 87 percent of the Terrebonne Parish water supply.

Under the Proposed Action Alternative, construction activities are not anticipated to directly impact groundwater. The exact depth of excavation and grading at the 2519 W Park Ave Group Site would not exceed a maximum of 7.5 feet for a gravity sewer and would otherwise be limited to the least extent necessary to facilitate construction and to comply with building code requirements. This depth for utilities is relatively shallow and unlikely to impact ground water resources. Possible sources of groundwater contamination associated with site construction and Group Site operations would be mitigated by appropriate BMPs. See Section 7 for BMPs.

5.2.4 Floodplains

EO 11988, Floodplain Management, requires Federal agencies to avoid to the extent possible the long- and short-term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct or indirect support of floodplain development wherever there is a

practicable alternative. FEMA's regulations for complying with EO 11988 are found at 44 CFR Part 9, Floodplain Management and Protection of Wetlands.

Alternative 1- No Action Alternative

Under the No Action Alternative, there would be no short- or long-term impacts to floodplains as a result of no federal actions.

Alternative 2 - Develop the 2519 W Park Ave Group Site with MHUs (Proposed Action)

Based on the preliminary FEMA Flood Insurance Rate Map (FIRM) panel number 22109C0100E, dated June 16, 2021, and accessed on April 22, 2022, at (<https://msc.fema.gov/portal/home>), the proposed project is located in floodzone X (Figure 3). An X zone is defined as an area of minimal flooding, yielding no floodplain concerns, being outside the Special Flood Hazard Area (SFHA). Therefore, the proposed action will not impact floodplains.

5.3 Coastal Zone Management

The Coastal Zone Management Act (CZMA) (P.L. 92-583, as amended; 16 U.S.C. Section 1451-1464) encourages the management of coastal zone areas and provides grants to be used in maintaining these areas. It requires that Federal agencies be consistent in enforcing the policies of state coastal zone management programs when conducting or supporting activities that affect a coastal zone. This is intended to ensure that Federal activities are consistent with state programs for the protection and, where possible, enhancement of the nation's coastal zones. The Act's definition of a coastal zone includes coastal waters extending to the outer limit of state submerged land title and ownership, adjacent shorelines, and land extending inward to the extent necessary to control shorelines. A coastal zone includes islands, beaches, transitional and intertidal areas, and salt marshes.

The CZMA requires that coastal states develop a State Coastal Zone Management Plan or program 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 must review the State Coastal Zone Management Plan to determine whether a proposed activity would be consistent with the plan.

Pursuant to the CZMA, the State and Local Coastal Resources Management Act of 1978 (LA Revised Statute [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 LDNR Office of Coastal Management (OCM). If a proposed action is within the coastal zone boundary, OCM will review the eligibility of the project prior to its review from other Federal agencies (USACE, USFWS, and National Marine Fisheries Service [NMFS]). The mechanism used to review these projects is the Coastal Use Permit (CUP). Per the CZMA, all proposed Federal projects within the coastal zone

must undergo a “Consistency Determination” by OCM for that project’s consistency with the state’s Coastal Resource Program (i.e., LCRP).

Alternative 1- No Action Alternative

The No Action Alternative would entail no activity and, therefore, would have no impact on the coastal zone as will result in no federal actions.

Alternative 2 - Develop the 2519 W Park Ave Group Site with MHUs (Proposed Action)

The Proposed Action Alternative would involve construction in a designated coastal zone. The Office of Coastal Management (OCM) determined in a letter (Attachment 3) dated September 28, 2012, that all Federal financial assistance (emergency or not) is fully consistent with the Louisiana Coastal Resources Program. FEMA submitted a Consistency Determination letter to the OCM dated September 29, 2021, that indicated project(s) in the following Individual Assistance (IA) designated parishes: Jefferson, Lafourche, Livingston, Plaquemines, St. Charles, St. Helena, St. James, St. John the Baptist, Tangipahoa, and Terrebonne Parish will not affect any coastal uses or resources in accordance with 15 CFR 930.36. In a OCM response letter dated September 29, 2021 (Consistency number C20210142), the OCM concurred with FEMA’s negative determination, as described by National Oceanic and Atmospheric Administration (NOAA) regulations on federal consistency at 15 CFR Part 930.

5.4 Threatened and Endangered Species and Critical Habitat

Section 7 of the Endangered Species Act of 1973 directs Federal agencies to utilize their authorities in furtherance of the purposes of the Act by carrying out programs for the conservation of listed species or designated critical habitats. The USFWS and the U.S. National Oceanic Atmospheric Administration (NOAA) are the agencies referred to as the “Services” that regulate compliance with the Endangered Species Act. The Magnuson-Stevens Fishery Conservation and Management Act (MSA) governs fisheries management for up to 200 miles offshore (the U.S. Exclusive Economic Zone). The NMFS is a part of NOAA and is responsible for implementing the MSA to ensure that U.S. fisheries comply with a wide range of conservation and management requirements.

Migratory birds are protected by the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA). Any activity that results in the take of migratory birds or eagles is prohibited unless authorized by the USFWS. There are no provisions for allowing the take of migratory birds that are unintentionally killed or injured. Any person or organization who plans or conducts activities that may result in the take of migratory birds is responsible in complying with the appropriate regulations and implementing appropriate conservation measures.

Table 1: Federally Listed Species Known to Occur in Terrebonne Parish

Common Name (Scientific Name)	Federal Status	Parish	Habitat	Potential to Occur within Project Area
West Indian Manatee (<i>Trichechus manatus</i>)	Threatened	Terrebonne	Found in marine, estuarine, and freshwater environments with a strong preference for warm and well-vegetated waters.	No; there is no suitable habitat present within the project area.

Alternative 1- No Action Alternative

Under the No Action Alternative, no project would be constructed; therefore, no impacts on species federally listed as threatened or endangered, or federally listed critical habitats would occur as a result of no federal actions.

Alternative 2 - Develop the 2519 W Park Ave Group Site with MHUs (Proposed Action)

There is (1) Federally listed threatened species, the West Indian Manatee, with the potential to occur in Terrebonne Parish, Louisiana (see Table 1); however, this species does not have the potential to occur within the 2519 W Park Ave Group Site project area, as the manatee species are marine species. Per USFWS Information for Planning and Consultation (IPaC) website, there are no critical habitat for this species within the project area.

Inspection of the proposed site did not indicate the presence of any species federally listed as threatened or endangered. The USFWS’s IPaC website (<https://ecos.fws.gov/ipac/>), accessed on April 22, 2022, was reviewed for a list of threatened and endangered species in the project area.

A search of the USFWS Critical Habitat online mapper and ArcGIS Map on April 22, 2022 resulted in a finding of no designated critical habitats in the project area. The following webpages were reviewed for critical habitats in the project area:

- <https://ecos.fws.gov/ecp/report/table/critical-habitat.html>
- <https://fws.maps.arcgis.com/home/index.html>

Based on the scope of work and lack of suitable habitat at the project site, FEMA has made the determination that the Proposed Action Alternative would have no effect on federally listed species listed as threatened or endangered and would have no effect on critical habitat.

5.5 Cultural Resources

The consideration of impacts to historic and cultural resources is mandated under Section 101(b)(4) of NEPA as implemented by 40 CFR Parts 1501-1508. Consideration of effects to historic properties as a result of Federal Undertakings is also mandated by Section 106 of the National Historic Preservation Act (NHPA) as implemented by 36 CFR Part 800. Direct Temporary Housing Assistance in the form of constructing TTHU Group Sites meets the definition

of a Federal Undertaking. Accordingly, FEMA is conducting Section 106 review for the Undertaking in accordance with the Programmatic Agreement (PA) among FEMA, the Louisiana State Historic Preservation Officer (SHPO), Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP), and Participating Tribes, executed on December 21, 2016, as amended.

Alternative 1- No Action Alternative

Under the No Action Alternative, there would be no impacts to historic and cultural resources as a result of no federal actions.

Alternative 2 - Develop the 2519 W Park Ave Group Site with MHUs (Proposed Action)

FEMA has defined the Area of Potential Effects (APE) for the proposed Undertaking to include the area of direct effects (project area) and the viewshed. The proposed APE is bounded by a forested area 500 feet south of the project area, open fields 500 feet from the north edge of the project area, a farm road 1,000 feet to the east from the east edge of the project area, and Bayou Terrebonne approximately 820 feet from the west edge of the project area. The proposed group site location was a forested area up until about 2008 when it was cleared and is currently a fallow, open field.

During the week of April 7, 2022 FEMA Historic Preservation Specialists consulted the Louisiana Office of Cultural Development's Cultural Resources National Register database, the Louisiana Cultural Resources Map and associated site files (Louisiana Division of Archaeology website), the US Department of Agriculture Web Soil Survey maps (USDA Website), various digital archival resources, photos, historic maps, and FEMA's internal files in order to identify the presence of historic properties.

FEMA has determined that there are no historic properties in the APE but there is one archaeological site of undetermined eligibility. Based on previous surveys, no Loci associated with this site are within the boundaries of the proposed temporary housing location. Given the temporary nature of the proposed housing site, the previous archaeological investigations within the APE, the surrounding twentieth and twenty-first century development, and the restoration of the property back to its previous condition following housing mission, the Undertaking has limited potential to affect any undocumented properties. In addition, avoidance measures will be implemented to limit ground disturbance along the southern entrance road. Originally, FEMA determined a finding of No Historic Properties Affected in accordance with Stipulation II.C.4 of the 2016 Statewide PA in a letter dated April 22, 2022.

FEMA received a No Adverse Effect to Historic Properties response from SHPO on April 27, 2022. FEMA reviewed its April 22, 2022 letter and revised the determination based on SHPO's comments to No Adverse Effect to Historic Properties in an email dated May 5, 2022. Per the Programmatic Agreement, FEMA consulted the following five (5) tribes: Coushatta Tribe of Louisiana, Eastern Shawnee Tribe of Oklahoma, Jena Band of Choctaw Indians, Mississippi Band of Choctaw Indians, and the Tunica-Biloxi Tribe of Louisiana. No tribe responded within the fifteen (15) day comment period.

FEMA conditions its approval of the group site on the following:

If during the course of work, archaeological artifacts (prehistoric or historic) are discovered, the Contractor shall stop all work in the vicinity of the discovery and take all reasonable measures to avoid or minimize harm to the finds. The Contractor shall inform their Individual Assistance (IA) contacts at FEMA, who will in turn contact FEMA Historic Preservation staff. The Contractor will not proceed with work until FEMA completes consultation with the SHPO and others, as appropriate.

5.6 Socioeconomic Resources

The project site is located in Terrebonne Parish, Louisiana. According to the United States Census Bureau (USCB), the population as of April, 2020, was 109,580 with a total of 45,766 households. The median household income was estimated at approximately \$48,747 (in 2019 dollars). According to the 2019 USCB Estimates, approximately 15.7% of population lives below poverty levels.

The population within Terrebonne Parish, Louisiana, is comprised of about 70.7% Caucasian, 19.2% African American, 1.1% Asian, 5.1% Hispanic, 6.2% American Indian and Alaska Native alone, 0.1% Native Hawaiian and Other Pacific Islander alone, and 2.7% Two or More Races. The demographic makeup of the group site residents is expected to be similar to the community as a whole (Table 2).

Table 2: Project Population Data⁴

Area	Population ¹	White (Caucasian) Alone	Black or African American Alone	Asian Alone	Hispanic or Latino	American Indian and Alaska Native Alone	Native Hawaiian and Other Pacific Islander Alone	Two or More Races	Poverty Rate ²	Households	Median Household Income ³
Terrebonne Parish	109,580	70.7%	19.2%	1.1%	5.1%	6.2%	0.1%	2.7%	15.7%	39,972	\$48,747
Louisiana	4,624,047	62.8%	32.8%	1.8%	5.3%	0.8%	0.1%	1.8%	19%	1,736,021	\$49,469

¹ USCB ACS, Vintage 2020 Population Estimates, July 1, 2021

² USCB 2019 ACS, 1-year estimates. Estimates are not comparable to other geographic levels of poverty estimates.

³ USCB ACS, Median Household Income (in 2019 dollars) and Households, 2015-2019

⁴ Data Source, USCB 2021 American Community Survey (ACS), 5-year estimates. Estimates are not comparable to other geographic levels due to methodology differences that may exist between different data sources

5.6.1 Environmental Justice

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

Alternative 1- No Action Alternative

The No Action Alternative would preclude the federal government from adequately addressing the urgency of providing temporary and transient emergency housing. Consequently, displaced disaster survivors would have to remain in the temporary housing they have acquired through their own resources and possibly far from their original home. The recovery of flood survivors and their communities would be further compounded by fewer housing options. They would continue to suffer social and economic stresses related to the disaster recovery.

Alternative 2 - Develop the 2519 W Park Ave Group Site with MHUs (Proposed Action)

The availability of federal assistance, including temporary housing for displaced individuals, is consistent with EO 12898. All forms of FEMA disaster housing assistance are available to any affected household that meets the conditions of eligibility. This group-housing site is a temporary housing solution. Therefore, long-term adverse effects to minority and/or low-income populations would not be expected.

The availability of temporary housing would result in a positive impact to displaced individuals, regardless of whether they are minority and/or low income. Therefore, the Proposed Action would not pose disproportionately high and adverse public health or environmental effects on minority and low-income populations.

The Proposed Action would utilize the project site and design to contract for the construction of approximately 86 manufactured housing unit pads and all necessary support facilities. The potential site residents would be from areas within the parish which have been impacted by the flooding. The local community is aware of this action and may experience a slight localized increase in the need for public services, such as schools, fire and police services, childcare, and medical services. However, the overall demand for public and commercial services is not expected to be greater than the pre-disaster demand and potential impacts are expected to be minimal.

5.7 Hazardous Materials

The management of hazardous materials is regulated under various Federal and state environmental and transportation laws and regulations, including but not limited to the Resource Conservation and Recovery Act (RCRA); the Comprehensive Environmental Response Compensation Liability Act (CERCLA); the Toxic Substances Control Act (TSCA); the

Emergency Planning and Community Right-to-Know provisions of the Superfund Amendments and Reauthorization Act; the Hazardous Materials Transportation Act; and the Louisiana Voluntary Investigation and Remedial Action statute.

The purpose of the regulatory requirements set forth under these laws is to ensure the protection of human health and the environment through proper management (identification, use, storage, treatment, transport, and disposal) of these materials. Some of the laws provide for the investigation and cleanup of sites already contaminated by releases of hazardous materials, wastes, or substances.

Alternative 1- No Action Alternative

No impacts from hazardous materials are expected as a result of the No Action alternative.

Alternative 2 - Develop the 2519 W Park Ave Group Site with MHUs (Proposed Action)

Upon review of the Phase 1 Environmental Site Assessment (ESA) Report with GeoCheck© on April 20, 2022, 2 sites were identified within 0.25 miles of the targeted property. LeBlanc Brothers Ready-Mix Inc, 2519 W Park Ave has a state of Louisiana NPDES permit which is typically for this type of business. No violations were noted. NVI LLC, 2449 West Park Ave was identified as a RCRA Large Quality Generator. No violations were noted.

It is not likely that there is a presence of any hazardous substances or petroleum products at the 2519 W Park Ave Group Site, nor is there any evidence of past or existing releases or any material threat of release of hazardous substances or petroleum products into the ground, ground water or structures within one mile of the group site property.

Therefore, under the Proposed Action alternative, there are no anticipated impacts from hazardous materials and hazardous substances. Any unusable equipment, debris, and material on site would be disposed of prior to occupancy in an approved manner and location. In the event significant items (or evidence thereof) are discovered during implementation of the project, petroleum products, hazardous materials, and toxic waste will be handled, managed, and disposed of in accordance to the requirements and to the satisfaction of the governing local, state, and federal agencies.

5.8 Traffic and Transportation

Louisiana Department of Transportation and Development (LDOTD) is responsible for maintaining public transportation, state highways, interstate highways under state jurisdiction, and bridges located within the state of Louisiana. These duties include the planning, design, and building of new highways in addition to the maintenance and upgrading of current highways. Roads not part of any highway system usually fall under the jurisdiction of and are maintained by applicable local government entities; however, the LDOTD is responsible for ensuring all local agency Federal-aid projects comply with all applicable Federal and state requirements.

The project area is adjacent to LA-24. LA-24 connects to LA-20 on the north and Highway 90 (Hwy-90) to the south. LA-20 connects to the Hwy-1, which cross through the city of Thibodaux. Hwy-90 connects to Interstate 49 and Interstate 10, which travels through neighboring states.

Alternative 1- No Action Alternative

Implementation of the No Action Alternative would not adversely affect the site traffic patterns, as no construction or other activities that would impact traffic would occur as a result of no federal actions.

Alternative 2 - Develop the 2519 W Park Ave Group Site with MHUs (Proposed Action)

Under the Proposed Action, a temporary increase in construction-related traffic during the group site construction would occur. Impacts related to these construction activities would be minor and temporary. This site has been approved by the Parish for this temporary housing use.

All reasonable precautions to control site access will be taken during construction. All activities would be conducted in a safe manner in accordance with Occupational Safety and Health Administration (OSHA) work zone traffic safety requirements. The appropriate signage will be posted and fencing installed to minimize potential adverse public safety concerns. Appropriate signage and barriers will be in place prior to construction activities in order to alert pedestrians and motorists of project activities and traffic pattern changes. Traffic impacts from construction activities would be considered minor. The LDOTD and Parish will be coordinated with in the planning and construction of this group site, to establish appropriate traffic safety measures and management protocols for the area.

6.0 PUBLIC INVOLVEMENT

Public involvement is being performed in compliance with the NEPA, FEMA’s Instruction 108-1-1 for implementing NEPA, and EOs 12898, 11988, and 11990. FEMA has prepared a public notice for public comment and public review for the Draft EA. FEMA has requested for posting of the notice on the websites of GOHSEP and Terrebonne Parish. This Draft EA is available at the following website is <https://www.fema.gov/emergency-managers/practitioners/environmental-historic/region/6>.

The public comment period will be limited to four (4) days from May 19, 2022 through May 22, 2022 at 5pm (Central Standard Time), due to the emergency nature of this action and need to provide temporary housing solutions for survivors of Hurricane Ida.

Written comments on the Draft EA can be sent via email to dr-4611-fema-ehp-ia@fema.dhs.gov. When responding by email, please reference the project name, “**Temporary Housing – 2519 W Park Ave Group Housing Site (TR-10)**” in the subject field. If no substantive comments are received, the Draft EA and Finding of No Significant Impact (FONSI) will become final and no further public noticing will be conducted.

7.0 MITIGATION

Construction of the Proposed Action was analyzed based on the studies, consultations, and reviews undertaken as reported in this Draft EA. The findings of this Draft EA conclude that no significant adverse impacts on human, natural and cultural resources are anticipated from the Proposed Action. During project construction, short-term impacts on noise are anticipated and the conditions listed in this Draft EA will mitigate and minimize these effects. Project short-term adverse impacts would be mitigated using BMPs, such as proper vehicle and equipment maintenance, and appropriate signage. Furthermore, given the Proposed Action is temporary (up to 18 months), no long-term adverse impacts are anticipated from the proposed project.

The following conditions must be met as part of this project:

1. Any change to the approved scope of work will require re-evaluation for compliance with NEPA and other Laws and Executive Orders.
2. This review does not address all federal, state, and local requirements. Acceptance of federal funding requires the recipient (i.e., State) to comply with all federal, state, and local laws. Failure to obtain all appropriate federal, state, and local environmental permits and clearances may jeopardize federal funding.
3. Coordination with the local floodplain administrator must occur prior to MHU placement. All coordination pertaining to these activities and Applicant compliance with any conditions should be documented and copies forwarded to the state and FEMA for inclusion in the permanent project files.
4. Compliance with State Regulations: Placement of MHUs or other readily fabricated dwellings must be in accordance and in compliance with Louisiana regulations.
5. Local Permitting and Codes: Any FEMA units will be installed in compliance with applicable local codes, ordinances and permitting requirements. Any contracted logistics installation entities (installers) for TTHU placement will secure all pertinent Federal, state, and local permits and approvals before work.
6. Health and Safety: Before unit occupancy, the responsible program, will provide Applicants with a Health and Safety Advisory regarding the flood hazard, local emergency evacuation plans, right-of-entry during an emergency, and possible unit haul off.
7. The responsible program will ensure the local emergency manager has information regarding location of TTHU occupants and potential special needs, to integrate into local emergency plans.
8. Appropriate best management practices will be implemented during site development to minimize sediment migration from the site into nearby water bodies. Surface runoff will be controlled by using siltation controls such as silt fencing around the construction site to minimize erosion of materials into adjacent wetlands and/or waterways. Any disturbed soil will be protected with seed or sod after construction in order to decrease the amount of soil

eroded by rainfall and runoff. Any fill stored on site will be appropriately covered to prevent erosion.

9. The Contractor shall comply with all requirements for a point source discharge to waters of the State. A Louisiana Pollutant Discharge Elimination System (LPDES) permit may be required in accordance with the Section 401 and 402 of the Clean Water Act (CWA) and the Louisiana Clean Water Code.
10. The Contractor shall comply with the requirements of the Louisiana Department of Environmental Quality (LDEQ) to observe precautions to control non-point source pollution, reduce erosion, and develop a Storm Water Pollution Prevention Plan and implement the required conditions.
11. During the decommissioning of the Name Group Site at the conclusion of the temporary group housing mission, all infrastructure will be removed. This includes all subsurface and above ground installations such as underground piping for water and sewer, electrical installations like poles and wiring, fencing, lighting, and all gravel laid for pads and access roads. A FEMA contractor will complete the deactivation and restoration of the site. The site will be reverted 100 percent back to a field, exactly as it was prior to the temporary housing development.
12. If during the course of work, archaeological artifacts (prehistoric or historic) are discovered, the Contractor shall stop work in the vicinity of the discovery and take all reasonable measures to avoid or minimize harm to the finds. The Contractor shall inform their Individual Assistance (IA) contacts at FEMA, who will in turn contact FEMA Historic Preservation (HP) staff. The Contractor will not proceed with work until FEMA HP completes consultation with the SHPO, and others as appropriate.
13. Unusable equipment, debris and material will be removed or disposed of prior to occupancy in an approved manner and location.
14. In the event significant items (or evidence thereof) are discovered during implementation of the project, petroleum products, hazardous materials, and toxic waste will be handled, managed, and disposed of in accordance to the requirements and to the satisfaction of the governing local, state, and federal agencies.
15. Construction activities with elevated noise levels will be limited from 7:00 A.M. to 7:00 P.M, unless otherwise approved by the Parish. Equipment and machinery used during construction will meet all local, State, and Federal noise regulations.
16. The Louisiana Department of Transportation and Development (LDOTD) and Parish will be coordinated with in the planning and construction of this group site, to establish appropriate traffic safety measures and management protocols for the area.
17. The appropriate signage must be posted, and fencing installed to minimize potential adverse public safety concerns. Appropriate signage and barriers will be in place prior to construction activities in order to alert pedestrians and motorists of project activities and traffic pattern changes.

18. Once the temporary housing need has ended, FEMA expects that all manufactured housing units (MHUs) would be hauled from the site in accordance with Section 408(d)(2) of the Stafford Act and returned to a FEMA storage facility. Furthermore, the project site would be either reasonably restored to its previous condition and then seeded or left with the site improvements per the lease terms negotiated between the GSA and the landowner.
19. MHUs shall comply with 24 CFR Part 3280 Manufactured Home Construction and Safety Standards (“Department of Housing and Urban Development [HUD] code”).
20. Work will comply with all conditions of U. S. Army Corps of Engineers Nationwide Permits, if required.

8.0 LIST OF PREPARERS

Draft EA Preparer(s):

- Kristen Briseno, Environmental Floodplain Specialist, FEMA
- John Hatch, Historic Preservation Specialist, FEMA
- Valerie Krenicky, Environmental Protection Specialist, FEMA
- Michael Bell, NEPA Review Specialist, FEMA

Field Team:

- Matthew Chapman, Field inspector, USACE

Reviewers:

- Merwick Black , Environmental Protection Specialist, FEMA
- Nicholas Moore, Historic Preservation Specialist, FEMA

Deputy Housing EHP Advisor (EHAD):

- Adam Borden, IM-CORE EHP Advisor, Office of Environmental Planning and Historic Preservation

Table 3: Summary Table—Affected Environment, Impacts, and Mitigation

Resource Area	Alternative 1- No Action Alternative	Alternative 2 - Proposed Action: Develop the Group Site with MHUs	Mitigation	Agency Coordination/ Permits
Soils	No change from current conditions.	There are no soils within the proposed site that are considered prime farmland soils. FEMA’s rating resulted in a total of 4 out of 160. In accordance with 7 CFR 658.4(c)(2), “sites receiving a total score of less than 160 (combined FEMA score total and NRCS score total) need not be given further consideration for protection and no additional sites need to be evaluated.”	No mitigation required	No agency coordination
Water Quality	No change from current conditions.	There is potential for localized increase in sedimentation as a result of site preparation activities. Potential impact to water quality in downstream swales, ditches, and streams (e.g., turbidity, siltation, biological oxygen demand).	Appropriate BMPs will be implemented during site development to minimize sediment migration from the site into nearby water bodies. Surface runoff will be controlled by using siltation controls such as silt fencing around the construction site to minimize erosion of materials into adjacent wetlands and/or waterways. Any disturbed soil will be protected with seed or sod after construction in order to decrease the amount of soil eroded by rainfall and runoff. Any fill stored on site will be appropriately covered to prevent erosion. If the project results in a discharge to waters of the State, a Louisiana Pollution Elimination System (LPDES) permit may be required in accordance with the Section 401 of the CWA and the Louisiana Clean Water Code.	LDEQ may require a LPDES permit in accordance with the Sections 401 and 402 of the CWA and the Louisiana Clean Water Code.

Wetlands	No change from current conditions.	No wetland areas are within the construction footprint.	No MHUs will be installed on the Project site where wetlands occur.	USACE
Floodplains	No change from current conditions.	MHUs would not be installed within the 100-year floodplain.	No mitigation required	None
Coastal Zone Management	No change from current conditions.	MHUs would be installed in a designated coastal zone.	No mitigation required	In a OCM response letter dated September 29, 2021 (Consistency number C20210142), the OCM concurred with FEMA's negative determination, as described by National Oceanic and Atmospheric Administration (NOAA) regulations on federal consistency at 15 CFR § 930.
Ground Water	No change from current conditions.	Under the Proposed Action, there are no anticipated direct impacts to groundwater.	No mitigation required	Department of Health, and LDEQ
Threatened and Endangered Species and Critical Habitat	No change from current conditions.	No effects to Threatened and Endangered Species and no Critical Habitat on the Project Site.	No mitigation required	No agency coordination
Cultural Resources	No change from current conditions.	Due to the emergency need to find safe housing locations for the many survivors, FEMA will follow Stipulation II.B.2 of the Agreement regarding Expedited Review for Emergency Undertakings. FEMA has determined that there would be No Adverse Effect to Historic Properties as a	If during the course of work, archaeological artifacts (prehistoric or historic) are discovered, the Contractor shall stop work in the vicinity of the discovery and take all reasonable measures to avoid or minimize harm to the finds. The Contractor shall inform their Individual Assistance (IA) contacts at FEMA, who will in turn contact FEMA	FEMA received a No Adverse Effect to Historic Properties response from SHPO on April 27, 2022. FEMA reviewed its April 22, 2022 letter and revised the determination

		result of the Proposed Action.	Historic Preservation (HP) staff. The Contractor will not proceed with work until FEMA HP completes consultation with the SHPO, and others as appropriate.	based on SHPO's comments to No Adverse Effect to Historic Properties in an email dated May 5, 2022. Per the Programmatic Agreement, FEMA consulted the following five (5) tribes: Coushatta Tribe of Louisiana, Eastern Shawnee Tribe of Oklahoma, Jena Band of Choctaw Indians, Mississippi Band of Choctaw Indians, and the Tunica-Biloxi Tribe of Louisiana. No tribe responded within the fifteen (15) day comment period.
Environmental Justice	No change from current conditions.	The Proposed Action would not pose disproportionately high and adverse public health or environmental effects on minority and low-income populations.	No mitigation required	No agency coordination
Hazardous Materials	No change from current conditions.	Under the Proposed Action, there are no anticipated impacts from hazardous materials and hazardous substances.	Unusable equipment, debris and material will be disposed of prior to occupancy in an approved manner and location. In the event significant items (or evidence thereof) are discovered during implementation of the project, petroleum products, hazardous materials, and toxic waste	No agency coordination

			will be handled, managed, and disposed of in accordance to the requirements and to the satisfaction of the governing local, state, and federal agencies.	
Traffic and Transportation	No change from current conditions.	Under the Proposed Action, a temporary increase in construction-related traffic during the group site construction. Once the Proposed Action has been completed, traffic would be expected to return to normal.	The appropriate signage must be posted, and fencing installed to minimize potential adverse public safety concerns. The LDOTD and Parish will be coordinated with in the planning and construction of this group site, to establish appropriate traffic safety measures and management protocols for the area.	LDOTD

Figures



Figure 1: Aerial Photo and Vicinity of Proposed 2519 W Park Ave Group Site



Figure 2: 2519 W Park Ave Group Site Proposed Layout



Figure 3: 2519 W Park Ave Flood Insurance Rate Map (FIRM)



Figure 4: Photograph of Existing Site Conditions at the Proposed 2519 W Park Ave Group Site Facing Southeast



Figure 5: Photograph of Existing Site Conditions at the Proposed 2519 W Park Ave Group Site Facing East

Attachments

The proposed undertaking will have no adverse effect on historic properties. Therefore, our office has no objection to the implementation of this project. This effect determination could change should new information come to our attention.



Kristin P. Sanders Deputy
State Historic Preservation Officer

Date

U.S. Department of Homeland Security
Federal Emergency Management Agency
FEMA-State Joint Field Office
FEMA DR 4611 - LA
1500 Main Street
Baton Rouge, LA 70802



FEMA

April 22, 2022

Kristin Sanders
State Historic Preservation Officer
Department of Culture, Recreation & Tourism
1051 North Third Street
Baton Rouge, LA 70802

Re: Section 106 Consultation, Expedited Review, Hurricane Ida, FEMA DR 4611-LA
Temporary Housing Group Site – 2519 West Park Property (GPS Coordinates: NE Corner
29.715875, -90.788819), Gray, Terrebonne Parish, Louisiana

Determination: No Historic Properties Affected

Dear Ms. Sanders:

The Federal Emergency Management Agency (FEMA) will be providing funds authorized under the Robert T. Stafford Disaster Relief and Emergency Assistance Act, or "Stafford Act," P.L. 93-288, as amended, in response to Disaster Declaration FEMA DR4611-LA for Hurricane Ida, dated August 29, 2021. Section 408(c)(1)(B) of the Stafford Act, as implemented in 44 C.F.R. Part 206, authorizes FEMA to provide Direct Temporary Housing Assistance or "Direct Assistance" for temporary housing due to a lack of available housing resources. FEMA is authorized to provide Direct Assistance in Ascension, Assumption, East Baton Rouge, East Feliciana, Iberia, Iberville, Jefferson, Lafourche, Livingston, Orleans, Plaquemines, Pointe Coupee, St. Bernard, St. Charles, St. Helena, St. James, St. John the Baptist, St. Martin, St. Mary, St. Tammany, Tangipahoa, Terrebonne, Washington, West Baton Rouge, and West Feliciana Parishes under the Individuals and Households Program.

FEMA is initiating consultation in accordance with the Programmatic Agreement among FEMA, the Louisiana State Historic Preservation Officer (SHPO), the Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP), and Participating Tribes, executed on December 21, 2016, as amended (2016 Statewide PA). Due to the emergency need to find safe housing locations for the many disaster survivors, FEMA is consulting per 36 CFR § 800.12(d) and the 2016 Statewide PA.

As a result of the damages caused by Hurricane Ida, approximately 4,591 households require temporary housing assistance with 1,711 of those households within Terrebonne Parish. As of April 21, 2022, FEMA proposes to provide direct temporary housing assistance through the placement of Transportable Temporary Housing Units (TTHU) and Uniform Federal Accessibility Standard (UFAS) housing units within multiple group sites to accommodate the housing need.

FEMA is initiating consultation for one (1) potential group site in Terrebonne Parish with this consultation letter. The proposed group site will be located at West Park Ave, Gray, Louisiana within parcel 69936 and covers an area of 16.31 acres (6.6 hectares) as shown in Figure 1. The location of the group site as well as the approximate number of TTHUs and UFAS, parcel size in acres, and associated figure numbers are included in Table 1.

Table 1: Proposed Group Site

Site Name	Number of Figures	City	Parish	Parcel #	Parcel (Acres)	No. TTHUs	Coordinates
2519 West Park Property	7	Gray	Terrebonne	69936	16.31	71 MHUs 14 UFAS 1 Office	29.715875, -90.788819, 29.714711, -90.787824, 29.714801, -90.791773, 29.713066, -90.790768

The Undertaking will require grading and leveling for the installation of individual gravel site pads to support approximately 71 Manufactured Housing Units (MHUs), 14 UFASs, 1 office, and mail and trash facilities will also be provided. Excavation for the installation of subsurface water, sewage, and electric utilities will be required for each individual TTHU and UFAS. The exact depth of excavation and grading at the group site is unknown but could reach a depth up to 3.5 feet approaching inner project area tie-ins, with pump wells for the sewage system being 4-6 feet in diameter and going to a depth of approximately 7 feet, the least extent necessary to facilitate construction and to comply with building code requirements. Access roads for ingress and egress to and from the site and for individual units will be constructed and strengthened where necessary. Gravel pads for parking and trash, concrete parking pads for units with ADA compliance requirements, site lighting, and a perimeter privacy fence will be installed. Figure 2 shows the proposed site plan for the TTHUs as developed by the U.S. Army Corps of Engineers (USACE).

Equipment staging will be limited to within the group site boundary and will not extend to any undisturbed ground that may be adjacent to the proposed group site. Debris generated during construction will be removed to an existing, licensed landfill. Any fill will be obtained from an existing commercial borrow source. The TTHUs will be removed once more permanent housing solutions are found for displaced individuals and families. Site improvements such as underground utilities, gravel and concrete pads, the perimeter fence, and access and circulation roads will also be removed.

FEMA has defined the Area of Potential Effects (APE) for the proposed Undertaking to include the area of direct effects (project area) and the viewshed. The proposed APE is bounded by a forested area 500 feet south of the project area, open fields 500 feet from the north edge of the project area, a farm road 1,000 feet to the east from the east edge of the project area, and Bayou Terrebonne approximately 820 feet from the west edge of the project area (Figure 3). The proposed group site location was a forested area up until about 2008 when it was cleared and is currently a fallow, open field. In accordance with Stipulation II.C(2)(b) of the 2016 Statewide PA, FEMA is requesting your concurrence with the proposed APE.

During the week of April 6, 2022, FEMA Historic Preservation Specialists consulted the Louisiana Office of Cultural Development's Cultural Resources National Register database, the Louisiana Cultural Resources Map and associated site files (LDOA website), the US Department of Agriculture Web Soil Survey maps (USDA Website), various digital archival resources, photos, and historic maps to identify the presence of historic properties within the APE.

Three soil types are present in the project area (USDA Website) as shown in Figure 4. Schriever clay, 0 to 1 percent slope, occasionally flooded makes up the majority of the area. A typical soil profile consists of a 0-to-4-inch-thick plowzone above a clay subsoil. This is a poorly drained backswamp soil. Lesser amounts of Schriever clay are also present. Schriever clay is classified as poorly drained bottom hardwoods and backswamp soil. These soils are not prime farmland. The 2519 West Park Group Site is located about 0.2 miles east of Bayou Terrebonne and 0.2 miles west of St. Louis Bayou. Given the clear-cutting activities and subsequent plowing of the area, along with the location of the project area in poorly drained backswamp, and distance from the bayous, would suggest a low probability for the presence of intact archaeological resources in the APE.

Background research efforts identified two Assessment and Reconnaissance surveys (McIntire 1954; McIntire and Badman 1987) and one Phase I archaeological survey (Hunter et al 2018) that included the APE. [REDACTED]

[REDACTED] The APE is not located in or adjacent to an eligible or potentially eligible historic district, nor are there any National Register of Historic Places (NRHP) listed or eligible standing structures in the APE.

A Phase I survey conducted by Coastal Environments, Inc. (CEI) included the majority of the current project area (Hunter et al. 2018; Report #22-5931). As a result of that survey, Site 16TR341 was recorded. The site has not been evaluated for inclusion in the NRHP. Based on the 2018 survey, four new loci were recorded (Loci 6 to 9) and five previously recorded sites (16TR123 to 16TR127; renamed Loci 1 to 5) were incorporated into the boundaries of Site 16TR341. Survey methods consisted of visual inspection followed by systematic shovel testing where surface artifacts or features were encountered. All loci are outside the proposed project area [REDACTED]. All three loci were recorded as light historic artifact scatters and no precontact material was recovered.

The majority of the APE consists of undeveloped land surrounded by modern, early twenty-first century development. In 2010 and 2012 commercial complexes were constructed just outside the project area, between the ingress and egress roads for the group site. Historic maps dating back to 1892 depict several houses located on the east side of what is today Highway 24 but all those structures have been razed and replaced through time (Figure 5).

Only one portion of the APE, the southern entrance road, was not included in the previously surveyed area conducted for CRM report number 22-5931. In order to minimize ground disturbance and prevent any potential impacts to unidentified cultural resources along the southern entrance road, FEMA in the consultation with USACE, has proposed the installation of a layer of

gravel to overlay the existing roadway (Figures 2, 6).

FEMA has determined that there are no historic properties in the APE but there is one archaeological site (Site 16TR341) of undetermined eligibility. Based on previous surveys, no Loci associated with this site are within the boundaries of the proposed temporary housing location. Given the temporary nature of the proposed housing site, the previous archaeological investigations within the APE, the surrounding twentieth and twenty-first century development, and the restoration of the property back to its previous condition following housing mission, the Undertaking has limited potential to affect any undocumented properties. In addition, avoidance measures will be implemented to limit ground disturbance along the southern entrance road. Therefore, FEMA has determined a finding of No Historic Properties Affected in accordance with Stipulation II.C.4 of the 2016 Statewide PA. FEMA will condition its approval of the group site on the following:

If during the course of work, archaeological artifacts (precontact or historic) are discovered, the Contractor shall stop work in the vicinity of the discovery and take all reasonable measures to avoid or minimize harm to the finds. The Contractor shall inform their Individual Assistance (IA) contacts at FEMA, who will in turn contact FEMA Historic Preservation (HP) staff. The Contractor will not proceed with work until FEMA HP completes consultation with the SHPO, and others as appropriate.

Due to the urgent need to provide housing for displaced individuals and households, your prompt attention to this matter is greatly appreciated. FEMA requests your concurrence with this determination comments within 15 days per the statewide PA. Should you have any questions or comments, please do not hesitate to contact FEMA Archaeologist John Hatch by at [REDACTED], and FEMA Historic Preservation Lead Brandon Badinger by phone [REDACTED] or by email at [REDACTED] or me by phone at [REDACTED] or by email at [REDACTED].

Sincerely,

Jeramé J. Cramer
EHP Advisor
DR-4611-LA
Region 6
FEMA-State Joint Field Office
1500 Main St
Baton Rouge, LA 70802

From: [Badinger, Brandon](#)
To: "Renee Erickson"
Cc: [Cramer, Jerame](#); [Borden, Adam](#); [Flournoy, Byron](#); [Moore, Nicholas](#)
Subject: RE: Updated Determination for FEMA Group Site Housing at 2519 West Park, Gray, Terrebonne Parish, Louisiana
Date: Thursday, May 5, 2022 1:03:18 PM

Good afternoon Renee,

FEMA has reviewed its April 22, 2022 letter regarding the Temporary Housing Group Site – 2519 West Park Property, Gray, Terrebonne Parish, Louisiana and SHPO’s letter dated April 27, 2022 finding that the proposed undertaking may have No Adverse Effect on historic properties (attached). FEMA recognizes that there is a potential to affect undocumented properties and is notifying SHPO that it has determined to revise its effect determination to No Adverse Effect based on SHPO’s comments.

FEMA will require the avoidance measures described in its April 22, 2022 letter to limit ground disturbance along the southern entrance and will continue to include the condition regarding the treatment of discoveries. FEMA is sending this email to SHPO for its records and is not requesting a response. If you have any questions please feel free to contact me at any time.

Sincerely,

Brandon Badinger
Environmental Protection Specialist | Environmental and Historic Preservation | Mitigation –
Region 6
DR 4611 LA Historic Preservation Lead - Housing
Louisiana Integration and Recovery Office (LIRO)

Federal Emergency Management Agency
[fema.gov](https://www.fema.gov)



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, NEW ORLEANS DISTRICT
7400 LEAKE AVE
NEW ORLEANS, LA 70118-3651

CEMVN-RG

15 April 2022

MEMORANDUM FOR Eunice Ford, FEMA

SUBJECT: Hurricane Ida Temporary Housing 2519 W Park Ave Site (MVN-2022-00455-SB)

1. Reference is made to your request for a determination of regulatory permitting requirements to place temporary housing called the 2519 W Park Ave site on property located in Section 16, Township 16 South, Range 16 East, Terrebonne Parish, Louisiana (enclosed map).
2. We have reviewed your project, as proposed, and determined that a DA permit under Section 404 of the Clean Water Act or Section 10 of the Rivers and Harbors Act will not be required. Any changes or modifications will require a revised determination.
3. Please be advised that this determination only applies to DA permitting requirements and does not alleviate your responsibility to obtain proper authorization from other federal, state, or local agencies that may be required.
4. Please be advised that this property is in the Louisiana Coastal Zone and a Coastal Use Permit may be required prior to initiation of any activities on this site. For additional information, contact Ms. Christine Charrier, Office of Coastal Management, Louisiana Department of Natural Resources at (225) 342-7953.

Brad
Guarisco

BRAD GUARISCO
Deputy Chief
Regulatory Division

Digitally signed by Brad Guarisco
Date: 2022.04.15 13:00:08 -05'00'

Encl

2519 W PARK TERREBONNE PARISH, LOUISIANA USACE PROPOSED LOT LAYOUT

71 MHU+14 UFAS+1 OFFICE 100' LOTS AS SHOWN

LOCATION, NUMBERING AND QUANTITY SUBJECT TO CHANGE AFTER FIELD SURVEY AND DESIGN



USACE IH 4/15/2022
By: BRAD GUARISCO
For: FORD
(MVN-2022-00455-SB)
 = PROJECT SITE



State of Louisiana
DEPARTMENT OF NATURAL RESOURCES
OFFICE OF COASTAL MANAGEMENT

September 29, 2021

Jerame J Cramer
EHP Advisor
FEMA-State Joint Field Office Region 6
[REDACTED]

RE: **C20210142**, Coastal Zone Consistency
FEMA – State Joint Field Office
Direct Federal Action – Negative Determination
Temporary housing assistance through the Individuals and Households Program (IHP).
**Jefferson, Lafourche, Livingston, Plaquemines, St. Charles, St. Helena, St. James,
St. John the Baptist, Tangipahoa, and Terrebonne Parish**

Dear Jerame J Cramer:

This office has received the above referenced negative consistency determination, in accordance with Section 307(c) of the Federal Coastal Zone Management Act of 1972, as amended. After careful review we have determined that the project does not demonstrate any reasonably foreseeable effects on coastal uses or resources. Therefore we concur with your negative determination, as described by NOAA regulations on federal consistency at 15 CFR §930.35.

Please refer to the above Consistency number when corresponding on this matter. If you have any questions please call Mark Hogan of the Consistency Section at ([REDACTED]) or [REDACTED]

/S/ **Charles Reulet**
Administrator
Interagency Affairs/Field Services Division

CR/SK/MH