



FEMA

U. S. Department of Homeland Security
FEMA Region 6
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Denton, TX 76209

**FINDING OF NO SIGNIFICANT IMPACT
4909 HIGHWAY 3127 (SC-05)
TEMPORARY GROUP HOUSING SITE
ST. CHARLES PARISH, KILLONA, LOUISIANA
FEMA-4611-DR-LA**

BACKGROUND

The President of the United States issued a Major Disaster Declaration for Hurricane Ida (FEMA-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 FEMA-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 Group Housing, the Multi-Family Lease and Repair Program (MLR), Direct Lease, and Transportable Temporary Housing Units (TTHUs). FEMA is proposing construction of an emergency temporary housing site, known as the 4909 Highway 3127 Group Site, for residents in St. Charles Parish.

An 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 Code of Federal Regulations 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. The EA analyzes the potential environmental impacts of the proposed temporary group housing, 4909 Highway 3127 Group Site, as part of an expedited review process. FEMA used the findings in this EA to determine whether to prepare an Environmental Impact Statement (EIS) or a Finding of No Significant Impact (FONSI).

The proposed site is located at 4909 Highway 3127 Killona, Louisiana 70057 (Latitude: 29.992407, Longitude: -90.496782). The site is located east of Mary Plantation Road and north of Highway 3127. Approximately 13 acres of the property would be developed. The site is primarily a vacant agricultural lot and zoned as a Commercial property. The site is bordered on the north by a vacant agricultural lot and zoned as a Commercial property. The site is bordered on the north by a mature tree line, to the south by Highway 3127, to the west by Mary Plantation Road, and to the

east by a mobile home park. The Nelson Coleman Correctional Center is southwest of the project area. A neighborhood, the Killona Community Center, and a cemetery exists north of the proposed site. The site ranges from approximately 6 to 9 feet above sea level. The surrounding topography ranges from an elevation of 5 to 11 feet above sea level.

A Public Notice for review and public comment on the Draft Environmental Assessment for the proposed action was prepared by FEMA. FEMA requested and confirmed the posting of the notice on the websites of the Louisiana Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP), St. Charles Parish, and St. Charles Parish Public Library. Due to the emergency nature of the housing mission, the public comment period was limited to 3 days from 8:00am May 24, 2022, to 5:00pm May 26, 2022 (CST).

As a result of FEMA's National Environmental Policy Act (NEPA) Environmental Assessment public comment period for the 4909 Hwy 3127 Temporary Group Housing site in St. Charles parish, FEMA received 55 comments from a total 19 public citizens during the open public comment period. A large majority of these comments were non-substantive with issues raised from the comment being addressed in the EA study already. The concerns raised involved how the new temporary housing would affect property values, increase traffic congestion, safety concerns, and how local community resources will be impacted with the influx of 75 additional housing units. FEMA has verified that the majority of the applicants that will reside within this group site are residents of the immediate area. Therefore, the site should not significantly increase possible stress on the local police, public transportation, and/or traffic and safety concerns when considering the placement of a group site within a community. In addition, it will not add a significant demand to local emergency services.

FINDINGS

Construction of the Proposed Action was analyzed based on the studies, consultations, and reviews undertaken as reported in this EA. The findings of this 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 air quality and noise are anticipated and conditions have been incorporated to mitigate and minimize these effects. Project short-term adverse impacts would be mitigated using Best Management Practices (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.

CONDITIONS

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. Compliance with State Regulations: Placement of MHUs or other readily fabricated dwellings must be in accordance and in compliance with Louisiana regulations.
4. 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.
5. 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.
6. 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.
7. 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.
8. 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.
9. During the decommissioning of the 4909 Highway 3127 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.

10. 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.
11. Unusable equipment, debris and material will be disposed of prior to occupancy in an approved manner and location.
12. 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.
13. 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.
14. 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.
15. 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.
16. Once the temporary housing need has ended, FEMA expects that all mobile 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 General Services Administration (GSA) and the landowner.
17. MHUs shall comply with 24 C.F.R. Part 3280 Manufactured Home Construction and Safety Standards (“Department of Housing and Urban Development [HUD] code”).
18. Work will comply with all conditions of U. S. Army Corps of Engineers Nationwide Permits, if required.

CONCLUSION

Based on the findings of the EA, coordination with the appropriate agencies, comments from the public, and adherence to the project conditions set forth in this FONSI, FEMA has determined that the proposed project qualifies as a major federal action that will not significantly affect the quality of the natural and human environment, nor does it have the potential for significant cumulative effects. As a result of this FONSI, an EIS will not be prepared (FEMA Instruction 108-1-1) and the proposed project as described in the attached EA may proceed.

APPROVAL

**KEVIN R
JAYNES**

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Kevin Jaynes

Regional Environmental Officer

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FEMA Region 6

Final Environmental Assessment
**4909 Highway 3127 Group
Housing Site (SC-05)**

FEMA-4611-DR-LA

Killona, St. Charles Parish, Louisiana

May 2022



FEMA

**U.S. Department of Homeland Security
Federal Emergency Management Agency, Region 6
Louisiana Integration and Recovery Office
1500 Main Street, Baton Rouge, Louisiana**

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ATTACHMENTS

- Attachment 1 - US Army Corps of Engineers (USACE) Wetland Delineation Letter**
- Attachment 2 - Office of Coastal Management (OCM) Coastal Zone Consistency Letter**
- Attachment 3 - Public Notice for 4909 Hwy 3127 Group Housing Site**
- Attachment 4 - Media Advisory for 4909 Hwy 3127 Group Housing Site**

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 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 EA will analyze the potential environmental impacts of the proposed temporary group housing, 4909 Highway 3127 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 163 households will require direct temporary housing assistance in St. Charles Parish. While approximately 40% of this need has been met with private and commercial sites, there remains a need for 97 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 St. Charles 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 4909 Highway 3127 Group Site would alleviate the need for approximately 75 housing units in St. Charles 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 EA include: the Clean Air Act; Clean Water Act (CWA); Endangered Species Act; National 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 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 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 St. Charles Parish. The 4909 Highway 3127 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 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 4909 Highway 3127 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 4909 Highway 3127 Killona, Louisiana 70057 (Latitude: 29.992407, Longitude: -90.496782). Figure 1 is an aerial photo depicting the boundaries of the project site and adjacent area. The site is located east of Mary Plantation Road and north of Highway 3127. Approximately 13 acres of the property would be developed. The site is primarily a vacant agricultural lot and zoned as a Commercial 3 property. A mobile home park is adjacent to the northeast, Highway 3127 to the south, Mary Plantation Road borders the west with more vacant land beyond the road, and a mature treeline to the north. The Nelson Coleman Correctional Center is southwest of the project area. A neighborhood, the Killona Community Center, and a

cemetery exists north of the proposed site.

The site ranges from approximately 6 to 9 feet above sea level. The surrounding topography ranges from an elevation of 5 to 11 feet above sea level.

4.2 Proposed Action Description

The Proposed Action would utilize the project site and design to contract for the construction of approximately 75 manufactured housing unit 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, if required.

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

- Site preparation would include clearing, grading, and removal of woody vegetation and debris.
- Infrastructure for public water exists and electrical services exist off Highway 3127 but would have to be extended onto the site.
- Infrastructure for sewage exists off of the southern boundary along Highway 3127.
- New lines and fire hydrants, as required, would be installed on the property.
- Storm water drainage has been already developed within the site.
- Site features include approximately 14% 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 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.

Per the United States Department of Agriculture Web Soil Survey (<https://websoilsurvey.sc.egov.usda/App/WebSoilSurvey.aspx>), accessed on April 27, 2022, there are two (2) types of soil present on the site, Cancienne silt loam and Cancienne silty clay loam. All soils present are classified as prime farmland soils.

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 4909 Highway 3127 Group Site with MHUs (Proposed Action)

The soils at the 4909 Highway 3127 Group Site are 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 43 is based on the following categories: Area in Non-urban Use (14 out of 15); Perimeter in Non-urban Use (4 out of 10); Percent of Site Being Farmed (20 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 (5 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)).

Therefore, although approximately 13 acres of prime farmlands soils would be permanently impacted, this impact is considered minor due to the vast amounts of the same and similar soils throughout St. Charles Parish. The Proposed Action must comply with the mitigation measures discussed in Section 7 of this 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). TMDLs for Dissolved Oxygen (natural sources) and Non-Native Aquatic Plants, and introduction of non-native organisms (accidental or intentional) have been established for Lac Des Allemands. 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 4909 Highway 3127 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 the 4909 Highway 3127 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 Lac Des Allemands.

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 4909 Highway 3127 Group Housing Site is located within 5 miles of Lac Des Allemands, an impaired waterbody, which is a waterbody or stream that is 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 as a result of silt-laden runoff from the construction site.

The Proposed Action Alternative would have no significant impacts to water quality in the area of the site.

5.2.2 Wetlands

The CWA and Executive Order (EO) 11990 define wetlands 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 U.S. and therefore would not require permits under Section 404 of the CWA or Section 10 of the Rivers and Harbors Act.

Alternative 2 - Develop the 4909 Highway 3127 Group Site with MHUs (Proposed Action)

Under the Proposed Action Alternative, based on the United States Fish and Wildlife Services (USFWS) National Wetlands Inventory (NWI) map accessed on April 21, 2022, available online at (<https://fws.gov/wetlands/>), no wetlands are identified in the project area.

The proposed project site is a 13 acre field off Highway 3127 and Mary Plantation Road in Killona, Louisiana. By letter dated April 27, 2022, the US Army Corps of Engineers (USACE), New Orleans District, states that the proposed work is in uplands (row crop field) and not subject to jurisdiction under Section 404 of the Clean Water Act (CWA) or Section 10 of the Rivers and Harbors Act. Contingent on final site plans, a Department of the Army permit will not be required for the proposed work. (see Attachment 1).

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 4909 Highway 3127 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 4909 Highway 3127 Group Site, on April 25, 2022, revealed that there are no identified sole source aquifers on this site.

The primary sources of groundwater in St. Charles Parish include the Gramercy Aquifer, Norco Aquifer, and the Gonzales-New Orleans Aquifer. The Gramercy Aquifer contains freshwater in western St. Charles Parish. The aquifer is composed of fine to coarse sand, and is in contact with a point-bar deposit of the Mississippi River, which seasonally charges the aquifer. The Gramercy aquifer ranges in thickness from less than 100 to 150 feet. The Norco aquifer contains both fresh and saltwater and is located in the northwestern portion of St. Charles Parish. The aquifer contains mostly medium to coarse sand and is withdrawn by wells. It ranges in thickness from 25 to 275 feet and is 320 to 460 feet below the surface. The Gonzales-New Orleans Aquifer contains saltwater in the southern portion of St. Charles Parish and freshwater laying on top of saltwater in the northern portion of the parish. The aquifer's thickness ranges from 175 to 325 feet and is located between 450 and 850 feet beneath the surface. The aquifer is composed of fine to very fine sand. Although St. Charles utilizes groundwater, the primary source of freshwater for St. Charles Parish is the Mississippi River, which is classified as a surface-water resource.

Under the Proposed Action Alternative, construction activities are not anticipated to directly impact groundwater. The exact depth of excavation and grading at the 4909 Highway 3127 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 4909 Highway 3127 Group Site with MHUs (Proposed Action)

Based on the preliminary FEMA Flood Insurance Rate Map (FIRM) panel number 22089C0150D, dated November 9, 2012, and accessed on April 21, 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 a result of no federal actions.

Alternative 2 - Develop the 4909 Highway 3127 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 2) 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.

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 4909 Highway 3127 Group Site with MHUs (Proposed Action)

Per USFWS Information for Planning and Consultation (IPaC) website accessed on April 27, 2022, there are no federally listed endangered or threatened 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 27, 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 27, 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 identifiable federally listed threatened or endangered species at the project site, FEMA has made the determination that the Proposed Action Alternative would have no effect on federally listed threatened or endangered species 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 4909 Highway 3127 Group Site with MHUs (Proposed Action)

During the week of April 25, 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.

The proposed Undertaking's footprint is not located within any districts that are listed in or that have been previously determined eligible for listing in the National Register of Historic Places (NRHP), nor are there any recorded, eligible archaeological sites within the boundaries of the project site. The nearest archaeological site is approximately one quarter mile northwest from the project area. The scope of work has been reviewed and meets the criteria in the PA, Appendix B - Programmatic Allowances, Tier II.A.5.a., b and II.D.1.a., b. In accordance with this PA, FEMA is not required to determine the NRHP eligibility of properties where work performed meets the Appendix B criteria. As such, FEMA has documented this determination in the project files, and considers the Undertaking Section 106 compliant without SHPO or tribal review or notification.

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 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.

5.6 Socioeconomic Resources

The project site is located in St. Charles Parish, Louisiana. United States Census Bureau (USCB), the population as of December, 2020, was 52,549 with a total of 19,308 households. The median household income was estimated at approximately \$68,113 (in 2020 dollars). According to the 2020 USCB Estimates, approximately 11.2% of population lives below poverty levels.

The population within St. Charles Parish, Louisiana, is comprised of about 62.2% Caucasian, 24.8% African American, 1.1% Asian, 7.9% Hispanic, 0.4% American Indian and Alaska Native alone, 0.0% Native Hawaiian and Other Pacific Islander alone, and 3.3% Two or More Races. The demographic makeup of the group site residents is expected to be similar to the community as a whole (Table 1)

Table 1: Project Population Data¹

Area	Population²	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 Rate³	Households	Median Household Income⁴
St. Charles Parish	52,549	62.2%	24.8%	1.1%	7.9%	0.4%	0.0%	3.3%	11.2%	19,308	\$68,113
Louisiana	4,624,047	62.8%	32.8%	1.8%	5.3%	0.8%	0.1%	1.8%	17.8%	1,739,497	\$49,469

¹ Data Source, USCB 2020 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

² USCB ACS, Vintage 2020 Population Estimates, July 1, 2021

³ USCB 2019 ACS, 1-year estimates. Estimates are not comparable to other geographic levels of poverty estimates.

⁴ USCB ACS, Median Household Income (in 2019 dollars) and Households, 2015-2019

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 4909 Highway 3127 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 75 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 no federal actions.

Alternative 2 - Develop the 4909 Highway 3127 Group Site with MHUs (Proposed Action)

Upon review of the EDR Report dated April 28, 2022, one (1) site is within approximately 0.25 miles of the target property. The target property was identified as a LADOTD Pre-approved Emergency Debris Site for Solid Waste. Upon further review, the site was approved to be used for staging, chipping and grinding, and open burning of vegetative debris and staging of Category C and D debris. From a review of records including the EDR Radius Reports, there is no evidence of past or existing releases or any material threat of release of hazardous substances or petroleum projects on the proposed group housing site.

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 Mary Plantation Road and Highway 3127. Highway 3127 is a four lane highway that connects to Interstate 310 (I-310) to the east. I-310 connects to I-10. I-10 connects to Baton Rouge, Louisiana.

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 4909 Highway 3127 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 was performed in compliance with the NEPA, FEMA's Instruction 108-1-1 for implementing NEPA, and EOs 12898, 11988, and 11990. FEMA prepared a public notice for public comment and public review for the Draft EA. FEMA requested and confirmed the posting of the notice on the websites of GOHSEP, St. Charles Parish, and St. Charles Parish Public Library. This Draft EA is available at the following website: https://www.fema.gov/sites/default/files/documents/fema_oehp-4909-hwy-3127-killon-dea.pdf.

The public comment period was limited to three (3) days from 8:00am May 24, 2022 through May 26, 2022 at 5:00pm (Central Standard Time), due to the emergency nature of this action and need to provide temporary housing solutions for survivors of Hurricane Ida.

As a result of FEMA's National Environmental Policy Act (NEPA) Environmental Assessment public comment period for the 4909 Hwy 3127 Temporary Group Housing site in St. Charles parish, FEMA received 55 comments from a total 19 public citizens during the open public comment period. A large majority of these comments were non-substantive with issue raised from the comment being addressed in the EA study already. The concerns raised involved how the new temporary housing would affect property values, increase traffic congestion, safety concerns, and how local community resources will be impacted with the influx of 75 additional housing units. FEMA has verified that the majority of the applicants that will reside within this group site are residents of the immediate area. Therefore, the site should not significantly increase possible stress on the local police, public transportation, and/or traffic and safety concerns when considering the placement of a group site within a community. In addition, it will not add a significant demand to local emergency services.

7.0 MITIGATION

Construction of the Proposed Action was analyzed based on the studies, consultations, and reviews undertaken as reported in this EA. The findings of this 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 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. Compliance with State Regulations: Placement of MHUs or other readily fabricated dwellings must be in accordance and in compliance with Louisiana regulations.
4. 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.
5. 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.
6. 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.
7. 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.
8. 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.
9. During the decommissioning of the 4909 Highway 3127 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.

10. 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.

11. Unusable equipment, debris and material will be disposed of prior to occupancy in an approved manner and location.

12. 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.

13. Construction activities with elevated noise levels will be limited from 7:00 A.M. to 7:00 PM, unless otherwise approved by the Parish. Equipment and machinery used during construction will meet all local, State, and Federal noise regulations.

14. 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.

15. 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.

16. 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.

17. MHUs shall comply with 24 CFR Part 3280 Manufactured Home Construction and Safety Standards (“Department of Housing and Urban Development [HUD] code”).

18. Work will comply with all conditions of U. S. Army Corps of Engineers Nationwide Permits, if required.

8.0 LIST OF PREPARERS

EA Preparer(s):

- Nicholas Moore, Historic Preservation Specialist, FEMA

- John Hatch, Historic Preservation Specialist, FEMA

Field Team:

- Josh Spurgeon, Site Inspector, USACE

Reviewers:

- Jason Spencer, Environmental Protection Specialist, FEMA
- Charles Barrowclough, Environmental Protection Specialist, FEMA

Deputy Housing EHP Advisor (EHAD):

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

Table 2: 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.	Two (2) of the soils at the 4909 Highway 3127 site are considered prime farmland. FEMA’s rating resulted in a total of 43 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.	Wetlands will not be impacted by the proposed action as no wetlands exists on the project area.	No MHUs will be installed on the Project site where wetlands occur.	USACE
Floodplains	No change from current conditions.	No MHUs would be installed within the 100-year floodplain as the site is in an X Zone.	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.	The scope of work has been reviewed and meets the criteria in	If during the course of work, archaeological artifacts (prehistoric or	Per the Programmatic Agreement, the

		Appendix B - Programmatic Allowances, Tier II.A.5.a., b. and II.D.1.a., b. In accordance with this PA, FEMA is not required to determine the National Register eligibility of properties where work performed meets the Appendix B criteria. As such, FEMA has documented this determination in the project files, and considers the Undertaking Section 106 compliant without SHPO or tribal review or notification.	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.	project is covered under the following allowances: II.A.5.a., b and II.D.1.a., b.
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 will be handled, managed, and disposed of in accordance to the requirements and to the satisfaction of the governing local, state, and federal agencies.	None
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,	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	LDOTD

		traffic would be expected to return to normal.	planning and construction of this group site, to establish appropriate traffic safety measures and management protocols for the area.	
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Figures



Figure 1: Aerial Photo and Vicinity of Proposed 4909 Highway 3127 Group Site



Figure 2: 4909 Highway 3127 Group Site Proposed Layout



Figure 3: 4909 Highway 3127 Flood Insurance Rate Map (FIRM)



Figure 4: Photograph of Existing Site Conditions at the Proposed 4909 Highway 3127 Group Site Facing Northeast



Figure 5: Photograph of Existing Site Conditions at the Proposed 4909 Highway 3127 Group Site Facing East

Attachments



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

CEMVN-RG

27 April 2022

MEMORANDUM FOR Eunice Ford, FEMA

SUBJECT: Hurricane Ida Temporary Housing 4909 Hwy 3127 Site (MVN-2022-00504-SB)

1. Reference is made to your request for a determination of regulatory permitting requirements to place temporary housing called the 4909 Hwy 3127 site on property located in Section 1, Township 12 South, Range 19 East, St. Charles 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

Digitally signed by Brad
Guarisco
Date: 2022.04.27 21:47:44
-05'00'

BRAD GUARISCO
Deputy Chief
Regulatory Division

Encl

4909 HWY 3127
ST CHARLES PARISH, LOUISIANA
USACE PROPOSED LOT LAYOUT

61 MHU + 10 UFAS + 1 OFFICE - ALL LOTS 100' LENGTH

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



USACE

IH 4/27/2022

By: BRAD GUARISCO

For: FORD

(MVN-2022-00504-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

**FEMA PUBLIC NOTICE OF AVAILABILITY
DRAFT ENVIRONMENTAL ASSESSMENT
FOR TRANSPORTABLE TEMPORARY HOUSING UNIT GROUP SITE
KNOWN AS 4909 HIGHWAY 3127 GROUP HOUSING SITE (SC-05)
ST. CHARLES PARISH, KILLONA, LOUISIANA**

Interested parties are hereby notified that the Federal Emergency Management Agency (FEMA) has prepared a Draft Environmental Assessment (EA) for a proposed Transportable Temporary Housing Unit (TTHU) group site. This Public Notice will be published on the Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP), St. Charles Parish Public Library, and St. Charles Parish Government websites. The group site may provide suitable temporary housing opportunities for individuals and families displaced under the major disaster declaration for Hurricane Ida (FEMA-4611-DR-LA) (for the incident beginning August 26, 2021) signed by the President on August 29, 2021.

The proposed action includes developing an approximately 13-acre site for up to approximately 75 TTHUs to be located in St. Charles Parish, Louisiana in the town of Killona. Activities may include, where necessary, site clearing, grading, road construction, the placement of concrete pads, utilities (electricity, telephones, water, and sewer), and the transport and installation of manufactured homes to the site. In accordance with the National Environmental Policy Act of 1969 (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 on the human and natural environment. FEMA has determined that constructing the 4909 Highway 3127 Group Site in a floodplain as identified on a Flood Insurance Rate Map (FIRM) would result in impacts to and from the floodplain. Per 44 CFR Part 9, FEMA concluded that there is no practicable alternative to constructing a group site in the floodplain in St. Charles Parish.

In order to meet the urgent need of Hurricane Ida survivors to find temporary housing, FEMA has conducted an expedited environmental review process to identify and address environmental issues. The draft EA summarizes the purpose and need, site selection process, affected environment, and potential environmental consequences associated with the proposed action.

The Draft EA is available for public review through FEMA's website: https://www.fema.gov/sites/default/files/documents/fema_oehp-4909-hwy-3127-killon-dea.pdf. 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 – 4909 Highway 3127 Group Housing Site (SC-5)**" in the subject field.

The public comment period will be limited to 3 days, from May 24, 2022, through May 26, 2022, at 5:00 PM CST, due to the emergency nature of this action and need to provide temporary housing solutions for survivors of Hurricane Ida. 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.

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



FEMA

May 23, 2022

DR-4611-LA MA-078

FEMA News Desk: (225) 389-2408

FEMA-NewsDesk-Louisiana-Disasters@fema.dhs.gov

Media Advisory

Public Notice: Draft Environmental Assessment for FEMA Group Housing Site in St. Charles Parish – 4909 Hwy 3127 Group Housing Site

BATON ROUGE, La. – FEMA has posted a Public Notice regarding the availability of a Draft Environmental Assessment prepared for a proposed group housing site for survivors in need of housing as a result of Hurricane Ida. There is a need for 79 units in St. Charles Parish to house parish residents.

The proposed group site is known as 4909 Hwy 3127 Group Housing Site (SC-05). The proposed action includes developing a 13-acre site that will accommodate up to 75 transportable Temporary Housing Units located in the city of Killona, Louisiana. Activities may include, where necessary, site clearing, grading, road construction, the placement of concrete pads, utilities (electricity, water and sewer), and the transport and installation of transportable temporary housing units to the site.

FEMA group sites are generally occupied by families who lived in the area before the hurricane. Group sites do not typically increase demands for local services such as schools and police and fire protection.

Once the direct housing program ends and a group site is no longer needed, FEMA will remove all housing units. After all units have been vacated and removed from the site, the infrastructure is removed, and the property returned as close as possible to its original state.

FEMA is required to provide a Public Notice for the 4909 Hwy 3127 Group Housing Site Draft Environmental Assessment, which can be found online here: https://www.fema.gov/sites/default/files/documents/fema_oehp-4909-hwy-3127-killon-public-notice.pdf.

This notice provides instructions regarding how to access the Draft Environmental Assessment and how to provide comments.

The public comment period will be limited to three days due to the emergency nature of this action and need to provide temporary housing solutions for survivors of Hurricane Ida.

The public comment period begins at 8 a.m. on Tuesday, May 24, and ends at 5 p.m. on Thursday, May 26. If no substantive comments are received, the Draft Environmental Assessment and Finding of No Significant Impact will become final and no further public noticing will be conducted.

For the latest information visit fema.gov/disaster/4611. Follow the FEMA Region 6 Twitter account at twitter.com/FEMARegion6 or on Facebook at facebook.com/FEMARegion6/.

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FEMA's mission is helping people before, during, and after disasters.

Disaster recovery assistance is available without regard to race, color, religion, nationality, sex, age, disability, English proficiency or economic status. If you or someone you know has been discriminated against, call FEMA toll-free at 833-285-7448. If you use a relay service, such as video relay service (VRS), captioned telephone service or others, give FEMA the number for that service. Multilingual operators are available (press 2 for Spanish).