

Draft Environmental Assessment
Clulee Group Housing Site
(SC-03)

FEMA-4611-DR-LA

Hahnville, Saint Charles Parish, Louisiana

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FEMA

U.S. Department of Homeland Security
Federal Emergency Management Agency, Region 6
Louisiana Integration and Recovery Office
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- Attachment 1 - Coordination Letters with State Historic Preservation Officer**
- Attachment 2 - US Army Corps of Engineers (USACE) wetland delineation letter**
- Attachment 3 - Office of Coastal Management (OCM) coastal zone consistency letter**

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 Clulee proposed temporary 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 these 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 February 24, 2022, based on applicant call outs, FEMA estimates that approximately 324 households will require direct temporary housing assistance in St. Charles Parish. While private sites should supply 114 MHU units, there remains a need for 210 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 temporary group sites is made only after all other housing solutions have been exhausted and the housing needs remain. The development of the Clulee Group Site will alleviate the need for approximately 205 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 is 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 Clulee 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 Clulee 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 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 proposed Clulee Group Housing site is located off Homeplace Road (State Highway 3160), in Hahnville, Louisiana (Latitude: 29.968326, Longitude: -90.419027). The temporary housing site is a 38.5-acre tract of land located on a larger property owned by Neal Clulee & Company. The Neal Clulee property is located at 15317 River Road and consists of approximately 260 acres. Figure 1 is an aerial photo depicting the boundaries of the project site. The selected site is zoned as openland and is in agricultural production (Figures 5,6,7).

The 260-acre Clulee property is a working farm in active sugarcane production. The property is bordered by River Road (Hwy 18) on the eastern side, Homeplace Road to the north, wetlands to the west and farmland to the south. The entrance to the property faces River Road which follows the Mississippi River and the associated levees. A historic plantation home and outbuildings are located at the entrance of the property, the rest to the farm is agricultural fields (Figure 4). The landscape gradually slopes from the homeplace to wooded wetlands at the back of the farm.

The 38.5-acre proposed group housing site is on the 260-acre Clulee property and faces north to Homeplace Road. Small manufacturing businesses occupy the opposite side of Homeplace Road. An entrance road connects the proposed group site property to Homeplace Road. The 38.5-acre sugarcane field is recently harvested (Figure 5). Approximately 205 mobile home units (MHUs) would be placed in the proposed footprint to be used as temporary group site housing.

4.2 Proposed Action Description

The Proposed Action would utilize the project site to construct approximately 205 manufactured housing unit pads and all necessary support facilities (Figure 2). These pads will 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, the placement of gravel for roads, trailer pads and resident parking, and concrete for disabled American Disabilities Act (ADA) parking areas.

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

- Site preparation will include clearing, grading, and removal of crop vegetation.
- Infrastructure for water and electrical services exist off Homeplace Road but would have to be extended onto the site.
- New lines and fire hydrants, as required, will be installed on the property.
- Storm water drainage will 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 will be established during the construction period and a perimeter fence would be installed 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.

A USDA soil survey map was reviewed on February 17, 2022, to determine if prime farmland exists onsite. The entire 38.5-acre proposed group site is designated as prime farmland. The prime farmland soil is classified as Thibaut clay with 0-1% slopes (Figure 6).

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 Clulee Group Site with MHUs (Proposed Action)

The soil at the Clulee Group Site is 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 45 is based on the following categories: Area in Non-urban Use (10 out of 15); Perimeter in Non-urban Use (10 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 (5 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). The total Site Assessment points (Part VI in the AD 1006 Form) of 45 is less than 160 indicates which indicates a site need not be given further consideration for FPPA protection (per 7 CFR § 658.4(c)(3)).

Therefore, although approximately 38.5 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

The Clulee Group Housing Site is located within 5 miles of Bayou Labranche, the main impaired water. This 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. Impaired waterbodies and streams are on the Louisiana Water Quality 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, Nitrate, Phosphorus and Pathogens have been established for this stream, which flow into Lake Pontchartrain. 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.

Alternative 2 - Develop the Clulee Group Housing 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.

The facility will be required to obtain all permits required for the discharge of sanitary wastewater. Based on the levels of permitting, the maximum level of discharge would not exceed 100,000 gallons per day.

The Clulee Group Housing Site is located within 5 miles of Bayou Labranche, the main impaired water, 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.

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.”

Alternative 1 - No Action Alternative

The No Action Alternative will have no impact on wetlands or waters of the US and will not require Department of the Army permits.

Alternative 2 – Develop the Clulee Group Housing Site with MHSs (Proposed Action)

Based on the United States Fish and Wildlife Services (USFWS) National Wetlands Inventory (NWI) map accessed on February 15, 2022, available online at (<https://fws.gov/wetlands/>), no wetlands and/or waters are identified on the proposed group housing site property.

By letter dated February 14, 2022, the US Army Corps of Engineers (USACE), New Orleans District, confirms that the proposed work is in uplands and not subject to jurisdiction under Section 404 of the Clean Water Act (CWA) or Section 10 of the Rivers and Harbors Act (Attachment 2). Contingent on final site plans, a Department of the Army permit will not be required for the proposed work.

No waters and/or wetlands of the US would be impacted by the Proposed Action.

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 Clulee 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 Clulee Group Site, on February 17, 2022, revealed that there are no identified sole source aquifers on this site.

The primary sources of groundwater in St. Charles Parish include the Mississippi River alluvial aquifer system and underlying Gramercy aquifer. The Mississippi River alluvial aquifer contains saltwater throughout St. Charles 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 50 to 450 feet. The aquifer discharges into rivers, canals, and lakes, and is also withdrawn by wells. The aquifer receives recharge from the Mississippi River on a seasonal basis and is also recharged by infiltration of rainfall, as well as vertical leakage from the underlying Gramercy aquifer. Recharge to the Gramercy aquifer is primarily from rainfall, but it also receives leakage from the overlying Mississippi River alluvial aquifer.

Under the Proposed Action Alternative, construction activities are not anticipated to directly impact groundwater. The exact depth of excavation and grading at the Clulee Group Site is unknown but would likely not exceed 3.5 feet for utility trenching. Otherwise, excavation will 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-term 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-term or long-term impacts to floodplains as a result of the federal actions.

Alternative 2 - Develop the Clulee Group Site with MHUs (Proposed Action)

Based on the FEMA Flood Insurance Rate Map (FIRM) panel number 22089C0135D, dated September 11, 2012, and accessed on February 14, 2022, at (<https://msc.fema.gov/portal/home>), the proposed project is located in flood Zone X (0.2%) (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.

Alternative 2 - Develop the Clulee 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 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 § 930 (see Attachment 3).

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 United States Fish and Wildlife Service (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 St. Charles Parish

Common Name (Scientific Name)	Federal Status	Habitat	Potential to Occur within Project Area
West Indian Manatee (<i>Trichechus manatus</i>)	Threatened	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.

Alternative 2 - Develop the Clulee Group Site with MHUs (Proposed Action)

There is one (1) Federally listed threatened and candidate species, the West Indian Manatee, with the potential to occur in St. Charles Parish, Louisiana; the West Indian Manatee (Table 1). However, the West Indian Manatee is an aquatic species and the proposed project is an agricultural field. Therefore, this species does not have the potential to occur within the project area. Per USFWS Information for Planning and Consultation (IPaC) website, there are no critical habitat 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 February 17, 2022, was reviewed for a list of threatened and endangered species in the project area. While these listed species can occur in St. Charles Parish, the proposed group housing site does not contain suitable habitat for this listed species.

A search of the USFWS Critical Habitat online mapper and ArcGIS Map on January 14, 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 habit

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. In addition, providing Direct Temporary Housing Assistance in the form of constructing TTHU Group Sites meets the definition of a Federal Undertaking pursuant to Title 36 Code of Federal Regulations Part 800. Accordingly, FEMA is required to comply with Section 106 of the National Historic Preservation Act (NHPA). FEMA is initiating Section 106 review for the Undertaking in accordance with the Programmatic Agreement between 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 (Agreement). Due to the emergency need to find safe housing locations for the many survivors, FEMA is consulting per 36 CFR § 800.12(d) and Stipulation II.B.2 of the Agreement regarding Expedited Review for Emergency Undertakings.

Alternative 1- No Action Alternative

Under the No Action Alternative, there would be no impacts to historic properties.

Alternative 2 - Develop the Clulee Group Site with MHUs (Proposed Action)

FEMA has determined the Area of Potential Effects (APE) for the proposed Undertaking, to include the footprint of the group site, for direct effects related to the proposed work (project area), and a 1/4 mile viewshed APE around the perimeter of the proposed group site (measured from the boundary of each side of the project area). The proposed group site location is active sugarcane fields. Modern development is present north and south of the APE with marshland and forested wetlands to the west, and agricultural fields to the east.

During the week of February 8, 2022, FEMA 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.

The Clulee Group Site is located within the boundaries of Homeplace Plantation, which is registered as a National Historic Landmark (NHL) and is listed in the National Register of Historic Places (NRHP). The proposed group housing site is just over 0.5 miles from the NRHP-listed plantation house. The soils in the project area are typical of those found in backswamps and are poorly drained, and although decent for sugarcane agriculture, are not suitable for building structures without soil modification. There are no structures, features, or identified sites in the APE. Pedestrian survey and soil probing in the area of direct effects produced only isolated historic artifacts and no features, but modern culverts and heavy drainage indicate the presence of disturbance and poorly drained soil conditions. The APE is bordered by modern development to the north and south which indicates that the historic viewshed has already been somewhat compromised. Any potential effects to the viewshed to Homeplace were minimized through design changes related to location and removal and will be temporary in nature given the removal of the group site upon completion of the housing mission.

FEMA originally determined that there were No Historic Properties Affected as defined in 36 CFR 800.16(l) within the APE. National Park Service (NPS) was notified of the Undertaking on February 24, 2022, per the Programmatic Agreement. The Choctaw Nation of Oklahoma and the SHPO submitted written concurrence on February 25, 2022. The remaining nine (9) tribes (Alabama-Coushatta Tribe of Texas, Coushatta Tribe of Louisiana, Eastern Shawnee Tribe of Oklahoma, Jena Band of Choctaw Indians, Kialegee Tribal Town, Mississippi Band of Choctaw Indians, The Muscogee (Creek) Nation, The Seminole Nation of Oklahoma, Tunica-Biloxi Tribe of Louisiana) did not respond within the regulatory timeframes. The Jena Band of Choctaw Indians and the Muscogee (Creek) Nation responded after the seven (7) day comment period expired. NPS did not concur with FEMA's determination of No Historic Properties Affected in a letter received on March 3, 2022. After further discussion SHPO and NPS on March 9, 2022, FEMA amended its determination in a letter submitted on March 14, 2022 to a finding of **No Adverse Effect to Historic Properties with Conditions** in accordance with Stipulation II.C.4 of the 2016 Statewide PA. NPS provided written concurrence on March 15, 2022 (See Attachment 3 for all correspondence). FEMA will condition approval of the group site on the following:

During the decommissioning of the Clulee 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.

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. According to the United States Census Bureau (USCB), the population as of April 2020, was 52,5497 with a total of 21,000 households. The median household income was estimated at approximately \$69,019 (in 2019 dollars). According to the 2019 USCB Estimates, approximately 12.2% of population lives below poverty levels.

The population within St. Charles Parish, Louisiana, is comprised of about 70.2% Caucasian, 26.5% African American, 1.1% Asian, 6.4% Hispanic, 0.4% American Indian and Alaska Native alone, 0.1% Native Hawaiian and Other Pacific Islander alone, and 2.0% Two or More Races. The demographic makeup of the group site residents is expected to be similar to the community (Table 2).

Table 2: Project Population Data¹

Area	Population ²	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 ³	Households	Median Household Income ⁴
St. Charles Parish	52,549	70.2%	26.5%	1.1%	6.4%	0.4%	0.1%	1.7%	11.3%	21,000	\$69,019
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

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

¹ 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

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

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 Clulee 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 bring income to the local community by contracting for the construction of approximately 205 manufactured housing unit pads and all necessary support facilities. In addition, the City of Hahnville and its 3,000 residents may see an increase in sale of products and food to supply the relocated community for the 18-month housing period. The relocated community may produce 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 much greater than the pre-disaster demand and potential impacts are expected to be minimal and temporary.

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 Resource Conservation and Recovery Act; Comprehensive Environmental Response Compensation Liability Act; the Toxic Substances Control Act; 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.

Upon review of records including the EDR Radius Report dated February 11, 2022, there is no evidence of past or existing releases or any material threat of release of hazardous substances or petroleum products within 0.25 miles of the target property.

Alternative 1- No Action Alternative

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

Alternative 2 - Develop the Clulee Group Housing Sites with MHUs (Proposed Action)

Based on the final review of the Environmental Data Resources (EDR) Reports on January 11, 2022, there is one Very Small Quantity Generator, the Civil Construction Company within approximately 0.25 miles of the target property. However, there is no record of releases or violations from this business.

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 with 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-3160 (Homeplace Road). An existing access road connects the proposed project to LA-3160. Homeplace Road joins River Road (Highway 18) to the east near the community of Hahnville.

Alternative 1- No Action Alternative

With the No Action Alternative, construction or other activities that would impact traffic would not occur.

Alternative 2 - Develop the Clulee 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 the Parish will coordinate for 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, St. Charles Parish, and St. Charles Parish Public Library websites. This Draft EA is available at the following website <https://www.fema.gov/emergency-managers/practitioners/environmental-historic/region/6>.

The public comment period will be limited to three (3) days from 8am, March 23, 2022, through March 25, 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, “**Clulee Group Housing Site (SC-03)**” in the subject field. If no substantive comments are received, the Draft EA and 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 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 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:

- Any change to the approved scope of work will require re-evaluation for compliance with NEPA and other Laws and Executive Orders.
- This review does not address all federal, state, and local requirements. Acceptance of federal funding requires the State of Louisiana 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.
- Compliance with State Regulations: Placement of MHUs or other readily fabricated dwellings must be in accordance and in compliance with Louisiana regulations.
- 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.
- 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.
- 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.
- 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.
- 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.
- During the decommissioning of the Clulee 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.
- If during work, archaeological artifacts and/or human remains (prehistoric or historic) are discovered, all work must stop in the vicinity of the discovery and reasonable measures

must be taken to avoid or minimize harm to the finds. The Governor’s Office of Homeland Security and Emergency Preparedness (GOHSEP) and FEMA must be immediately notified. Work cannot proceed until FEMA Historic Preservation completes consultation with the State Historic Preservation Office/Louisiana Division of Archaeology and others, as appropriate.

- 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 with the requirements and to the satisfaction of the governing local, state, and federal agencies.
- 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.
- 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.
- 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.
- 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 GSA with the landowner.
- MHUs shall comply with 24 C.F.R. Part 3280 Manufactured Home Construction and Safety Standards (“Department of Housing and Urban Development [HUD] code”)
- 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):

- Michael Bell, Environmental Protection Specialist, FEMA
- Nicholas Moore, Historic Preservation Specialist, FEMA

Field Team:

- Jerome Kelly Jr., USACE Group Site SME

Reviewers:

- Charles Barrowclough, Environmental Protection Specialist, FEMA
- Byron Flourney, Environmental Protection 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.	The Canadienne silt loam soil at the Clulee site is considered prime farmland. FEMA’s rating resulted in a total of 45 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

Resource Area	Alternative 1- No Action Alternative	Alternative 2 - Proposed Action: Develop the Group Site with MHUs	Mitigation	Agency Coordination/ Permits
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.

Resource Area	Alternative 1- No Action Alternative	Alternative 2 - Proposed Action: Develop the Group Site with MHUs	Mitigation	Agency Coordination/ Permits
Wetlands	No change from current conditions.	No wetland areas are within the construction footprint.	No mitigation required	By letter dated February 14, 2022, the US Army Corps of Engineers, New Orleans District, confirms that the proposed work is in uplands and not subject to jurisdiction under Section 404 of the Clean Water Act (CWA) or Section 10 of the Rivers and Harbors Act.
Floodplains	No change from current conditions.	No MHUs will be installed within the 100-year floodplain.	No mitigation required	No agency coordination
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.

Resource Area	Alternative 1- No Action Alternative	Alternative 2 - Proposed Action: Develop the Group Site with MHUs	Mitigation	Agency Coordination/ Permits
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

<p>Cultural Resources</p>	<p>No change from current conditions.</p>	<p>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 result of the Proposed Action.</p>	<p>During the decommissioning of the Clulee 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.</p> <p>If during 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.</p>	<p>FEMA has consulted with SHPO and obtained concurrence on 2/25/2022. FEMA Notified NPS on 2/24. Tribal Nation concurrence was also obtained from the Choctaw Nation of Oklahoma on 2/25/2022. There was no response from the other tribes within the seven day comment period. The Muscogee (Creek) Nation submitted written concurrence on March 3, 2022 and the Jena Band of Choctaw Indians concurred on March 9, 2022.</p> <p>NPS did not concur with FEMA's determination of No Historic Properties Affected in a letter received on March 3, 2022. After further discussion SHPO and NPS on March 9, 2022, FEMA amended its determination in a letter submitted on March 14, 2022</p>
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Resource Area	Alternative 1- No Action Alternative	Alternative 2 - Proposed Action: Develop the Group Site with MHUs	Mitigation	Agency Coordination/ Permits
				to a finding of No Adverse Effect to Historic Properties with Conditions in accordance with Stipulation II.C.4 of the 2016 Statewide PA. NPS provided written concurrence on March 15, 2022.
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.	No agency coordination

Resource Area	Alternative 1- No Action Alternative	Alternative 2 - Proposed Action: Develop the Group Site with MHUs	Mitigation	Agency Coordination/ Permits
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 ⁵

Figures



Figure 1: Clulee Proposed Group Site and Surrounding Area



Figure 2: Clulee Proposed Group Site with Conceptual Plan



Figure 3: Clulee Proposed Group Site Flood Hazard Map



Figure 4: Homeplace



Figure 5: Sugarcane Field Clulee Proposed Group Housing Site



Figure 6: Clulee Proposed Group Housing Site



Figure 7: Entrance to Clulee Proposed Group Housing Site

Attachments

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



Kristin P. Sanders
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

February 24, 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 – Clulee Property (GPS Coordinates: NE Corner 29.968326,
-90.419027), Hahnville, St. Charles 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 Section 106 review for the above referenced Undertaking 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 survivors, FEMA is consulting per 36 CFR § 800.12(d) and Stipulation II.B.2 of the 2016 Statewide PA regarding Expedited Review for Emergency Undertakings.

As a result of the damage caused by Hurricane Ida, approximately 9,532 survivors will require temporary housing assistance, with 571 survivors within Saint Charles Parish. As of February 8, 2022, based on applicant call outs, FEMA estimates that approximately 304 households in Saint Charles Parish will require 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.

FEMA is initiating consultation for (1) potential group site within Saint Charles Parish within this consultation letter. The Clulee Group Site is located south of Highway 3160 (Homeplace) and west of Highway 18 on parcel #102100200002 in the Town of Hahnville (Figure 1). GPS Coordinates of the boundary corners for the proposed group site are included in Table 1. The total parcel measures 373 acres with the 83.7-acre project area footprint at its west extent. The location of the group site, as well as the approximate number of TTHU and UFAS, project area size in acres, and associated figure numbers are included in Table 1, below.

Table 1: Proposed Group Site

Site Name	Figure #s	City	Parish	Parcel #	Project Area (Acres)	No. TTHUs	Coordinates
Clulee	1 -11	Hahnville	Saint Charles	102100200002	83.7	117 TTHU; 88 UFAS	29.968326, -90.419027 29.966471, -90.423632 29.961079, -90.421092 29.962993, -90.416401

The Undertaking would require grading and leveling for the installation of roads and individual gravel site pads to support approximately 117 TTHUs, 88 UFASs, and 1 office. Mail and trash facilities will also be provided. Excavation for the installation of subsurface water, sanitation, and electric utilities would be required for each individual TTHU and UFAS. Access roads for ingress and egress to and from the site and circulation roads to allow access to each individual unit would be constructed, or strengthened as necessary, and gravel pads for parking and trash, concrete parking pads for units with residents requiring upgrades to meet ADA compliance requirements, site lighting, and a perimeter privacy fence would 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 would be limited to the 83.7-acre group site boundary and will not extend to any undisturbed ground that may be adjacent to the 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 exact depth of excavation and grading at the group site is unknown but could reach a depth up to 2.4 m (8 ft) approaching inner project area tie-ins, with pump wells being 4-6 ft (1.2 to 1.8 m) in diameter and going no deeper than 10 ft (3 m), the least extent necessary to facilitate construction and to comply with building code requirements. The utilities would extend as required to connect to existing utility tie-ins west of the Project Area on Highway 3160 through a 1,178 ft (360 m) long existing access road. The TTHUs will likely be removed once more permanent housing solutions are found for displaced individuals and families. However, site improvements such as underground utilities, gravel and concrete pads, the perimeter fence, and access and circulation roads may remain.

FEMA has determined the Area of Potential Effects (APE) for the proposed Undertaking to include the footprint of the group site for direct effects related to the proposed work (project area), and a

1/4 mile viewshed APE around the perimeter of the proposed group site (measured from the boundary of each side of the project area) as depicted in Figure 3. The group site is located in active sugarcane fields. Modern development is present north and south of the APE with marshland and forested wetlands to the west. 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 February 8, 2022, FEMA 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 (NCRS Web Soil Survey, accessed online February 2020; Figure 4). Thibaut clay, 0 to 1 percent slope, makes up the majority of the area. A typical soil profile consists of a 0 to 6-inch thick plowzone above a clay subsoil. This is a poorly drained backswamp soil. Lesser amounts of Cancienne silt loam and Schriever clay are also present. Cancienne is classified as poorly drained bottom hardwoods and Schriever is classified as poorly drained backswamp. All soils are prime farmland. The Clulee Group Site is located about 0.7 miles east of St. Charles Canal and 1.2 mile west of the Mississippi River. Given the shallow plowzone, the location of the project area primarily in backswamp, and the distance from the river, this suggests a low probability for the presence of intact archaeological resources in the project area.

Background research efforts identified modern housing and commercial development and one Assessment and Reconnaissance survey (McIntire 1954) in the APE. No historic districts, standing structures or previously recorded archaeological sites are located in the APE. However, the Clulee group site is located on the historic grounds of Homeplace Plantation which was listed in the National Register of Historic Places in 1977 and is a National Historic Landmark (Figure 5);



FEMA EHP staff conducted a site visit of the proposed housing group site on February 19, 2022, based on the nearby NHL property and discussions during a project scoping call with SHPO. FEMA conducted a pedestrian survey and judgmental soil probes across the site which resulted in the observation of a few isolated artifacts. Isolated artifacts included industrial ceramic sherds likely used for piping for drainage, metal fragments, and glass. The isolated artifacts encountered would not be enough to be considered a scatter or a feature. In addition to the pedestrian survey, FEMA conducted judgmental soil probes along the entire eastern boundary and roughly half of the northern and southern boundaries, as well as the entire center line all within the boundaries of the project area. No historic features or artifacts were encountered during the survey. Several large modern PVC culverts, likely part of the agricultural drainage and irrigation system, were observed within the project area indicating significant prior ground disturbance (Figure 6).

Site 16SC55 was identified during a Phase I survey conducted [REDACTED] of the current APE (Christopher Goodwin & Associates 1987) (see Figure 3). This site was recorded as having a

precontact scatter consisting of a few lithic sherds and a historic scatter of material dating from ca 1795 to the present. [REDACTED]

[REDACTED] It should be noted that several online sources, primarily repeating the St. Charles Parish Virtual Museum website, indicate that Hahnville was the previous location of the Quinntassa Village. However, the marker is in Flaggville, located about a half mile south of the Homeplace Plantation entrance. No site has been recorded at the location and the area has been in continuous development since the nineteenth century.

A summary of the historical development of Hahnville and Homeplace Plantation is necessary for understanding the historic context and archaeological potential of the current project area. Occupation and cultivation at Homeplace Plantation have continued uninterrupted for over 200 years. Table 2 presents the owners and periods of occupation as could be discerned from online research, the National Register of Historic Places (NRHP) form, and the American Historic Buildings Survey (HABS) report.

In 1804 the first courthouse in St Charles Parish was constructed in what would come to be known as the Village of Flaggville and in 1843 the "St Charles" post office was built, both on property owned by G. E. Payne. The 1858 Hahnville quad map depicts the courthouse and post office in Flaggville (Figure 7). In 1870 T. Sharpe laid out the official village plan for O. J. Flagg and the village came to be known as Flaggville (also spelled Flagville). At the same time (ca. 1872) George Michael Hahn laid out the Village of Hahnville which was separated from Flaggville by Homeplace Plantation. Eventually, Flaggville was incorporated into Hahnville. The 1891 Hahnville map is annotated to show the locations of Flaggville and Hahnville (Figure 8).

Researchers generally agree that the Gaillard (also spelled Guillard) family were the earliest landholders, dating back sometime to the late eighteenth century, with a 10,000-acre parcel. There is some dispute about who constructed the plantation house, but it has been attributed to Gaillard or Fortier with most sources suggesting the later. It is generally agreed that the house was built sometime between 1787 and 1791. The HABS 1940 report noted that at one time there was an arc of 26 slave houses located to the rear of the house. Some research suggests that Fortier acquired 28 enslaved persons along with the land purchased from the Widow Gaillard (1972 H. E. Yoes III article attached to the NRHP form). Having 26 houses for only 28 slaves seems unlikely (given there were probably family members living together) and the 1810 census reported that Fortier had 56 slaves at that time. Therefore, it is possible that Fortier brought enslaved persons with him when he moved onto the plantation and constructed more dwellings. The Yoes article also stated that only 11 acres (which would include the immediate environs of the house) was purchased from the Widow Gaillard; although this could not be verified with additional research, Fortier did apparently continue to purchase land to add to his plantation during his tenure.

Following Louis Edmond Fortier's death in 1849, Homeplace Plantation passed through several hands prior to the Civil War and emancipation. Undoubtedly, several enslaved people died while working at the plantation. This suggests that an associated cemetery would be located somewhere on the property. A WPA book written in 1942 included a chapter entitled "Slave Housing" which referenced the housing being typically located a short distance behind main house and noted that most housing was visible straight out the back door. If not directly out the back door, it may have been offset so as not to be visible out of the back door (*The Negro in Louisiana*, Marcus Christian

Collection, University of New Orleans Library).

Table 2. Record of Ownership

Owner(s)	Dates	Notes
Gaillard, Pierre	? – ca. 1803	10,000-acre tract; Plantation house constructed between 1787 and 1791
Fortier, Louis Edmond	ca. 1803	1810 census - 56 slaves; 4 household members
Fortier, Drausin	ca. 1849-1856	Sold by the Widow Fortier jointly to Drausin and 3 sons-in-law following Edmond's death
G. E. Payne	ca. 1856	Bought from Fortier's sister and brother-in-law who took ownership of the property following Drausin's death. It's possible Payne leased the property to the Welham & Godberry (sugar) Co. as they are shown on the 1858 map in the approximate location of Homeplace.
Augustus C. Graham	ca. 1866	
Consolidated Association of the Planters of Louisiana	ca. 1868	
Johnson, Braddish (Bradish)	ca. 1883	Dec 13, 1884 <i>St. Charles Herald</i> article confirms Johnson was owner at that time. "On the Homeplace a number of handsome new cabins are being built" (<i>Herald</i> Feb 2, 1884)
Haydel, Damien	ca. 1885	Haydel sold about 83 acres of the plantation, "of the upper tract of the Homeplace above Hahnville" (adjoining the upper line town of Hahnville), to T. T. Bandouin (<i>St. Charles Herald</i> , January 25, 1887)
Keller, Pierre Anatole and Haydel, Ulysses (son-in-law and son of Damien Haydel)	ca. 1889	Keller took the upriver portion including the house. Haydel took the downriver portion and started Caneland Plantation. Keller made several repairs ca. 1899 including removal of the sugar mill buildings and appurtenances
Keller, Richard J. and Mary Keller Clulee (et al)	Current	Current parcel (102100200002) size is 373 acres. The fields are leased out.

Bethlehem Cemetery is currently located west/ northwest of the plantation house complex, approximately 525 feet west of the back gate and it has not yet been recorded. The earliest burials with legible markers date to the late 1820s. The cemetery was first depicted on the 1932 Hahnville map (Figures 9 and 10) but was clearly founded prior to that date. Burials include members of the US Civil War Colored Troops and descendants of family members buried there in the twentieth and twenty-first centuries. The Bethlehem Cemetery may have been purchased by the same missionaries who, in 1865, established the Bethlehem Baptist Church in Hahnville (then Flagville) and continued its use as the local African American cemetery. Several iron crosses are present in the cemetery, possibly predating the use of headstones (Figure 11). Similar iron crosses have been recorded at antebellum slave cemeteries throughout the state.

The Clulee Group Site is not located adjacent to any historic districts that are listed in or that have been previously determined eligible for listing in the National Register of Historic Places. The project area is located in the fields of the historic Homeplace Plantation, but it is over 0.5 miles from the NRHP-listed plantation house. The soils in the project area are typical of those found in backswamps and are poorly drained, and although decent for sugarcane agriculture, are not suitable for building structures without soil modification. There are no structures, features, or identified sites in the APE. Pedestrian survey and auger testing in the area of direct effects produced no

historic artifacts or features, but modern culverts and heavy drainage indicate the presence of disturbance and poorly drained soil conditions. The APE is bordered by modern development to the north and south which indicates that the historic viewshed has already been somewhat compromised.

FEMA has determined that there are no historic properties as defined in 36 CFR 800.16(1) within the APE. Due to the temporary nature and intermittent use of the proposed housing along with the eventual removal of the above ground components of the Undertaking, the historic properties outside the APE would not be adversely affected by the proposed Undertaking. Therefore, FEMA has determined a finding of **No Historic Properties Affected** in accordance with Stipulation II.C.4 of the 2016 Statewide PA. FEMA would condition 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.

Due to the urgent need to provide housing for displaced individuals and households, your prompt attention to this matter would be greatly appreciated. We respectfully request concurrence with the proposed APEs and with this determination within three (3) days from receipt of this consultation, per Stipulation II.B.2 of the 2016 Statewide PA. Should you have any questions or comments, please do not hesitate to contact FEMA Archaeologist Tiffany Raszick by phone at [REDACTED] or by email at [REDACTED], or FEMA HP Lead Brandon Badinger at [REDACTED] or by email at [REDACTED], or me by phone at [REDACTED] or me by email at [REDACTED]

Sincerely,

Adam Borden
EHP Advisor
Region 6
FEMA-State Joint Field Office
FEMA-4611-DR-LA
1500 Main St
Baton Rouge, LA 70802

Enclosures: USACE Plan Set

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



February 24, 2022

Re: Section 106 Consultation, Expedited Review, Hurricane Ida, FEMA DR 4611-LA
Temporary Housing Group Site – Clulee Property (GPS Coordinates: NE Corner 29.968326,
-90.419027), Hahnville, St. Charles Parish, Louisiana

Determination: No Historic Properties Affected

To: Representatives of Federally recognized Tribes with Interest in this Project Area

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 Section 106 review for the above referenced Undertaking 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 survivors, FEMA is consulting per 36 CFR § 800.12(d) and Stipulation II.B.2 of the 2016 Statewide PA regarding Expedited Review for Emergency Undertakings.

As a result of the damage caused by Hurricane Ida, approximately 9,532 survivors will require temporary housing assistance, with 571 survivors within Saint Charles Parish. As of February 8, 2022, based on applicant call outs, FEMA estimates that approximately 304 households in Saint Charles Parish will require 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.

FEMA is initiating consultation for (1) potential group site within Saint Charles Parish within this consultation letter. The Clulee Group Site is located south of Highway 3160 (Homeplace) and west of Highway 18 on parcel #102100200002 in the Town of Hahnville (Figure 1). GPS Coordinates of

From: Lindsey Bilyeu [REDACTED]
Sent: Friday, February 25, 2022 3:19 PM
To: Badinger, Brandon [REDACTED]
Subject: RE: FEMA Expedited Emergency Section 106 Consultation for Clulee Property Located at 15317 River Rd, Saint Charles Parish, Louisiana

Mr. Badinger,

The Choctaw Nation of Oklahoma thanks FEMA for the correspondence regarding the above referenced project. St. Charles Parish lies in our area of historic interest. Our office has reviewed the information provided and we are unaware of any cultural or sacred sites in the immediate project area. The Choctaw Nation Historic Preservation Department concurs with the finding of “no historic properties affected”. However, we ask that work be stopped, and our office contacted immediately, in the event that Native American artifacts or human remains are encountered.

If you have any questions, please contact me.

Thank you,

Lindsey D. Bilyeu, MS
Senior Section 106 Reviewer
Choctaw Nation of Oklahoma
Historic Preservation Department
Office: [REDACTED]
Cell: [REDACTED]

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: FEMA Expedited Emergency Section 106 Consultation for Clulee Property Located at 15317 River Rd, Saint Charles Parish, Louisiana
Date: Thursday, March 3, 2022 9:23:49 AM
Attachments: [MCN_AOI_2021_LA.pdf](#)

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RE: Section 106 Review Expedited Consultation, Hurricane Ida, FEMA-4611-DR-LA
Undertaking: Temporary Housing Group Site – Clulee Property (GPS Coordinates: NE Corner 29.968326, -90.419027), Hahnville, St. Charles Parish, Louisiana

For your Records:

Thank you for the correspondence and acknowledgement regarding the potential impact on cultural and religious sites for the referenced project. The Temp Group Site-Clulee Property is currently inside of the Muscogee (Creek) Nation historic area of interest (AOI)(See Attached Map)

We do concur with this undertaking project as "**No Adverse Effect**" on any known cultural properties and defer to the state historic preservation officer pertaining any historic structures for this project, particularly the abutting parcel to north and less than 25 meters in proximity (Homeplace Plantation Property/Keller House) as per the Louisiana Office of Cultural Development . Thank you for compliance with the National Historic Preservation Act (NHPA)- Section 106 Laws, we do ask to cease operations if any inadvertent discovery is made, and to notify our THPO and the other Tribes that may have been contacted. If you have any further questions or concerns, please give us a call.

Gano Perez Jr.

Historic and Cultural Preservation Department, GIS Cultural Specialist
Muscogee (Creek) Nation
P.O. Box 580 | Okmulgee, OK 74447

T [REDACTED]
F [REDACTED]

Meyúksv-sekó Mvskokvlke



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From: Alexa DiDio [REDACTED]

Sent: Wednesday, March 9, 2022 2:13 PM

To: Borden, Adam [REDACTED]

Subject: RE: FEMA Expedited Emergency Section 106 Consultation for Clulee Property Located at 15317 River Rd, Saint Charles Parish, Louisiana

Dear Mr. Borden,

Regarding the above-mentioned project, the Jena Band of Choctaw Indians' THPO hereby concurs with the determination of No Adverse Effect. Should any inadvertent discoveries or anticipated impacts occur, please contact all Tribes with interest in this area. Thank you.

Sincerely,

Alexa DiDio

Assistant THPO, Cultural Department

Jena Band of Choctaw Indians

Phone: [REDACTED]



United States Department of the Interior



NATIONAL PARK SERVICE

Atlanta Federal Center
1924 Building
100 Alabama Street, SW
Atlanta, GA 30303

8.A.4

IN REPLY REFER TO:

March 3, 2022

Adam D. Borden
EHP Advisor, Region 6
FEMA-State Joint Field Office
1500 Main Street
Baton Rouge, Louisiana 70802

Dear Mr. Borden:

Thank you for your email dated February 24, 2022, notifying the National Park Service (NPS) of the Federal Emergency Management Agency's (FEMA) potential Clulee Group Site located south of Highway 3160 and west of Highway 18 on the historic grounds of Homeplace Plantation, a National Historic Landmark (NHL), within Saint Charles Parish in Hahnville, Louisiana.

We understand the Clulee Group Site would consist of approximately 117 Transportable Temporary Housing Units (TTHUs), 88 Uniform Federal Accessibility Standard (UFAS) housing units, and one office all having individual gravel site pads and the site requiring grading and leveling for the installation of roads. Also, there will be excavation for the installation of subsurface water, sanitation, and electric utilities for each housing unit with the whole site having lighting and surrounded by a perimeter privacy fence.

In addition to our National Parks, NHLs are the most important historic properties in the United States. Upon designation by the Secretary of the Interior, NHLs are automatically listed in the National Register of Historic Places and therefore included in the review of federal undertakings that are subject to Section 106 of the National Historic Preservation Act (NHPA). Section 110(f) of the NHPA and the Section 106 regulations contain provisions that set a higher standard of consideration and care for NHLs (54 U.S.C. 306107 and 36 CFR 800.10).

The Secretary of the Interior designated the Homeplace Plantation House NHL in 1970. In 1975, NHL documentation was prepared using a National Register form, as was the convention at the time. The nomination, certified in 1977, documents Homeplace Plantation's significance in American architectural history and identifies the acreage of the nominated property as 746 acres. Prepared at a time before current standards had been published (including establishing a period of significance and an inventory of contributing and non-contributing features), the nomination nonetheless supports the assumption that the sugarcane fields contribute to the NHL stating, "Homeplace still sits within a sugar plantation, as it has from its beginning..." As a contributing feature, it is important to take care to preserve the character of the agricultural landscape and to ensure that any changes to the sugarcane fields do not diminish the integrity of the NHL.

Interior Region 2 • South Atlantic-Gulf

Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi
North Carolina, Puerto Rico, South Carolina, Tennessee, U.S. Virgin Islands

At this time, the NPS **cannot concur** with the FEMA finding of no historic properties affected. Your letter acknowledges the group site is located on the historic grounds of Homeplace Plantation but not that it is located within the NHL boundary of the historic property. Even if the TTHUs will likely be removed once more permanent housing solutions are found as your letter states, the NPS believes the construction of the 83.7-acre Clulee Group Site has the potential to alter the character of the agricultural landscape and the character of the NHL.

The NPS recognizes the emergency need to provide temporary housing assistance to those affected by Hurricane Ida and we look forward to working with FEMA as this consultation continues. Please direct questions about this letter to Alesha Cerny at [REDACTED] or, by telephone at [REDACTED]

Sincerely,

Cynthia Walton
Acting Chief, Cultural Resources, Partnerships, and Science Division

Cc:

Kristin Sanders, State Historic Preservation Officer, Louisiana (via email)
Ms. Nicole Hobson-Morris, Deputy State Historic Preservation Officer, Louisiana (via email)
Tiffany Raszick, FEMA Archaeologist (via email)
Brandon Badinger, FEMA HP Lead (via email)

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



March 14, 2022

Cynthia Walton
Acting Chief, Cultural Resources, Partnerships, and Science Division
U.S. Department of the Interior
National Park Service
Atlanta Federal Center
1924 Building
100 Alabama Street, SW
Atlanta, GA 30303

Re: Section 106 Continuing Consultation, Expedited Review, Hurricane Ida, FEMA DR 4611-LA

Temporary Housing Group Site – Clulee Property (GPS Coordinates: NE Corner 29.968326, -90.419027), Hahnville, St. Charles Parish, Louisiana

Revised Determination: No Adverse Effect to Historic Properties with Conditions

Dear Ms. Walton:

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 initiated Section 106 review for the above referenced Undertaking 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 survivors, FEMA is consulting per 36 CFR § 800.12(d) and Stipulation II.B.2 of the 2016 Statewide PA regarding Expedited Review for Emergency Undertakings.

FEMA consulted on one (1) potential group site within Saint Charles Parish in a letter dated February 24, 2022. This letter fully described the Undertaking, the Area of Potential Effect, and FEMA's efforts to identify and evaluate historic properties. SHPO concurrence with FEMA's determination of "No Historic Properties Affected" was received in a letter dated February 25, 2022. FEMA EHP also received tribal concurrence from the Choctaw Nation of Oklahoma on February 25, 2022, the Muscogee (Creek) Nation on March 3, 2022, and the Jena Band of Choctaw Indians on March 9, 2022.

The National Park Service (NPS), Interior Region 2, via emailed letter on March 3, 2022, did not concur with the original finding of No Historic Properties Affected given "Homeplace still sits within a sugar plantation, as it has from its beginning..." and NPS noted that as "...a contributing feature, it is important to take care to preserve the character of the agricultural landscape and to ensure that any changes to the sugarcane fields do not diminish the integrity of the NHL." This continuing consultation is to revise FEMA's previous determination, address NPS's concerns about effects to the historic viewshed, and correct the National Historic Landmark (NHL) boundary brought to FEMA's attention by NPS.

Per conversation with USACE Design Team on March 10, 2022, and FEMA Logistics Branch on March 11, 2022, FEMA EHP confirmed that during the decommissioning of the site at the conclusion of the temporary group housing mission, all infrastructure will be removed. This includes all subsurface and aboveground 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 back to the pre-existing condition as a field, as it was prior to the temporary housing development. FEMA EHP is adding this language as a condition to the revised finding of No Adverse Effect to Historic Properties for this Undertaking.

FEMA has determined the Area of Potential Effects (APE) for the proposed Undertaking to include the footprint of the group site for direct effects related to the proposed work (project area), and a 1/4 mile viewshed APE around the perimeter of the proposed group site (measured from the boundary of each side of the project area) as depicted in Figure 1. The proposed group site location is active sugarcane fields. Modern development is present north and south of the APE with marshland and forested wetlands to the west, and agricultural fields to the east. 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 February 8, 2022, FEMA 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. FEMA staff also conducted a site visit on February 19, 2022.

Three soil types are present in the project area (NCRS Web Soil Survey, accessed online February 2020; Figure 2). Thibaut clay, 0 to 1 percent slope, makes up the majority of the area. A typical soil profile consists of a 6-inch-thick plowzone above a clay subsoil. This is a poorly drained

backswamp soil. Lesser amounts of Cancienne silt loam and Schriever clay are also present. Cancienne is classified as poorly drained bottom hardwoods and Schriever is classified as poorly drained backswamp. All soils are prime farmland. The Clulee Group Site is located about 0.7 miles east of St. Charles Canal and 1.2 mile west of the Mississippi River. Given the shallow plowzone, the location of the project area primarily in backswamp, and the distance from the river, this suggests a low probability for the presence of intact archaeological resources in the project area.

Background research efforts identified modern housing and commercial development and one Assessment and Reconnaissance survey (McIntire 1954) in the APE. No historic districts, standing structures or previously recorded archaeological sites are located in the Project Area. However, the Clulee Group Site APE is located in the agricultural fields associated with historic Homeplace Plantation (Figure 3). Although the APE is within the NHL boundaries, approximately 3,600 feet (0.68 miles) of sugarcane crops typically separate the plantation house from the proposed group site location.

The plantation house was registered as a NHL in 1970 and listed in the National Register of Historic Places (NRHP) in 1977. In 1979, the National Register boundaries were expanded to about 596 acres to include the agricultural fields south and west of the plantation house, and the land between the house and the river to the east. Since that time, modern housing developments were built at both the northern and southern boundaries of the modern parcel. A commercial concrete and rigging company is located across Hwy LA-3160 on the northwestern boundary of Homeplace, which is near the proposed group site location. Additionally, the plantation acreage no longer includes the portion between Highway 18 and the river, and two parcels were carved out on the south side on the plantation house. Other modern features include utility poles with lights situated along LA-3160, and several large, culverts associated with substantial and existing field roads were observed in and around the agricultural field during the FEMA site visit. Currently, the parish assessor records the parcel as 373 acres in size.



A FEMA Archaeologist and a Historic Preservation Specialist conducted a site visit to the proposed group housing site on February 19, 2022. FEMA conducted a pedestrian survey and judgmental soil probes across the area that resulted in the observation of a few isolated artifacts. The few isolated artifacts noted were all historic and included industrial ceramic sherds likely used for piping for drainage, metal fragments, and glass. The isolated artifacts encountered were not enough to be considered a scatter or a feature. In addition to the pedestrian survey, FEMA conducted judgmental soil probes along the entire eastern boundary and roughly half of the northern and southern boundaries, as well as the entire center line all within the boundaries of the project area. No features or artifacts were encountered during the survey. Several large modern PVC culverts, associated with existing field roads and the agricultural drainage and irrigation system, were observed within the project area indicating significant prior ground disturbance (Figure 4).

The Clulee Group Site is located within the boundaries of Homeplace Plantation, which is registered as a NHL and is listed in the NRHP. The proposed group housing site is just over 0.5 miles from the NRHP-listed plantation house (Figures 5-7). The soils in the project area are typical of those found in backswamps and are poorly drained, and although decent for sugarcane agriculture, are not suitable for building structures without soil modification. There are no structures, features, or identified sites in the APE. Pedestrian survey and soil probing in the area of direct effects produced only isolated historic artifacts and no features, but modern culverts and heavy drainage indicate the presence of disturbance and poorly drained soil conditions. The APE is bordered by modern development to the north and south which indicates that the historic viewshed has already been somewhat compromised. Any potential effects to the viewshed to Homeplace were minimized through design changes related to location and removal and will be temporary in nature given the removal of the group site upon completion of the housing mission.

Based on FEMA's discussions with your office and NPS on March 9, 2022, FEMA has determined a finding of **No Adverse Effect to Historic Properties with Conditions** in accordance with Stipulation II.C.4 of the 2016 Statewide PA. FEMA will condition approval of the group site on the following:

During the decommissioning of the Clulee Group Site at the conclusion of the temporary group housing mission, all infrastructure will be removed. This includes all subsurface and aboveground 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.

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.

Due to the urgent need to provide housing for displaced individuals and households, your prompt attention to this matter would be greatly appreciated. FEMA respectfully requests concurrence with the proposed APE and the updated determination by March 18, 2022. Should you have any questions or comments please do not hesitate to contact FEMA Archaeologist Tiffany Raszick by phone at _____ or by email at _____ or FEMA Historic Preservation on _____ by email at _____, or me by _____ or by email at _____

Sincerely,

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

Cc:

Ms. Alesha Cerny, National Park Service / Interior Region 2 (Legacy Southeast Region)
Ms. Kristin Sanders, State Historic Preservation Officer, Louisiana
Ms. Nicole Hobson-Morris, Deputy State Historic Preservation Officer, Louisiana
Mr. John Ketchum, FEMA Federal Preservation Officer



United States Department of the Interior



NATIONAL PARK SERVICE

Atlanta Federal Center
1924 Building
100 Alabama Street, SW
Atlanta, GA 30303

8.A.4

IN REPLY REFER TO:

March 15, 2022

Jeramé J. Cramer
EHP Advisor, Region 6
FEMA-State Joint Field Office
1500 Main Street
Baton Rouge, Louisiana 70802

Dear Mr. Cramer:

Thank you for your revised letter dated March 14, 2022, notifying the National Park Service (NPS) of the Federal Emergency Management Agency's (FEMA) potential Clulee Group Site located south of Highway 3160 and west of Highway 18 on the historic grounds of Homeplace Plantation, a National Historic Landmark (NHL), within Saint Charles Parish in Hahnville, Louisiana.

The NPS acknowledges the effort to correct the NHL boundary in your revised letter. The Secretary of the Interior designated the Homeplace Plantation House NHL in 1970. In 1975, NHL documentation was prepared using a National Register form, as was the convention at the time. The NHL nomination, certified in 1977, identifies the acreage of the nominated property as 746 acres. FEMA's revised letter points out that the parish assessor has currently recorded the parcel as 373 acres in size. Please know that an NHL may be under multiple ownership within the boundary and that property owners are free to make whatever changes they wish. The 373 acres recorded by the parish assessor has no bearing on the NHL boundary.

Additionally, it is not uncommon for the National Register boundary and the NHL boundary to be different. Decisions regarding NHL designation and boundary amendment are made by the Secretary while the National Register process goes through the State Historic Preservation Office and listing by the Keeper of the National Register of Historic Places. Because the official NHL boundary has not been amended and accepted by the Secretary of the Interior, the NHL boundary for purposes of this consultation consists of the 746 acres originally nominated.

We understand the Clulee Group Site would consist of approximately 117 Transportable Temporary Housing Units (TTHUs), 88 Uniform Federal Accessibility Standard (UFAS) housing units, and one office all having individual gravel site pads and the site requiring grading and leveling for the installation of roads. Also, there will be excavation for the installation of subsurface water, sanitation, and electric utilities for each housing unit with the whole site having lighting and surrounded by a perimeter privacy fence.

The NPS concurs with FEMA's revised finding of **no adverse effect to historic properties with conditions** as outlined in FEMA's revised letter regarding how the site will be returned to a

Interior Region 2 • South Atlantic-Gulf

field, exactly as it was prior to the temporary housing development. While the temporary housing development has the potential to alter the character of the agricultural landscape of the NHL, the NPS does not believe that an adverse effect will occur to the Homeplace Plantation House NHL.

The NPS recognizes the emergency need to provide temporary housing assistance to those affected by Hurricane Ida and appreciates the effort to revise the previous determination. Please direct questions about this letter to Alesha Cerny at [REDACTED], or, by telephone at [REDACTED]

Sincerely,

Cynthia Walton
Acting Chief, Cultural Resources, Partnerships, and Science Division

Cc:

Ms. Kristin Sanders, State Historic Preservation Officer, Louisiana (via email)
Ms. Nicole Hobson-Morris, Deputy State Historic Preservation Officer, Louisiana (via email)
Ms. Tiffany Raszick, FEMA Archaeologist (via email)
Mr. Brandon Badinger, FEMA HP Lead (via email)
Mr. John Ketchum, FEMA Federal Preservation Officer (via email)



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

CEMVN-RGJ

14 February 2022

MEMORANDUM FOR Christopher Klein, SAD

SUBJECT: Hurricane Ida Temporary Housing 15317 River Road site (MVN-2022-00212-SB)

1. Reference is made to your request for a determination of regulatory permitting requirements to place temporary housing called the 15317 River Road site on property located in Section 20, Township 13 South, Range 20 East, St. Charles Parish, Louisiana (enclosed map).
2. We have reviewed your project, as proposed, and determined that Department of the Army (DA) permits 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: 2022.02.14 17:50:54
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Encls



USACE IH 2/14/2022
 By: BRAD GUARISCO
 For: KLEIN
(MVN-2022-00212-SB)
 = PROJECT AREA



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