Draft Environmental Assessment

Luling Hwy 90 Group Housing Site (SC-6)

FEMA-4611-DR-LA

Boutte, St. Charles Parish, Louisiana

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U.S. Department of Homeland Security
Federal Emergency Management Agency, Region 6
Louisiana Integration and Recovery Office
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ACRONYMS AND ABBREVIATIONS

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

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

1.0 INTRODUCTION

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

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

This Draft Environmental Assessment (EA) has been prepared in accordance with the National Environmental Policy Act (NEPA) of 1969, the President's Council on Environmental Quality regulations to implement NEPA (40 CFR Parts 1500-1508), and FEMA's procedures for implementing NEPA (FEMA Instruction 108-1-1). FEMA is required to consider potential environmental impacts before funding or approving actions and projects. This Draft EA will analyze the potential environmental impacts of the proposed temporary group housing, Luling Hwy 90 Group Housing Site, as part of an expedited review process. FEMA will use the findings in this EA to determine whether to prepare an Environmental Impact Statement (EIS) or a Finding of No Significant Impact (FONSI).

2.0 PURPOSE AND NEED

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

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

Providing housing resources for survivors of Hurricane Ida is a priority of FEMA's recovery mission. As of May 06, 2022, based on applicant call outs, FEMA estimates that approximately 163 households will require direct temporary housing assistance in St. Charles Parish. While approximately more then half of this need has been met with private and commercial sites, there remains a need for 77 additional MHU units.

While the Direct Housing Task Force is also actively soliciting properties for Direct Lease and MLR, FEMA anticipates very few properties will be available. The low number of feasible private and commercial sites, MLR, and Direct Lease properties, is insufficient to meet the need for direct temporary housing in St. Charles Parish. The decision to develop Group Sites is made only after all other housing solutions have been exhausted and the housing needs remain. The development of the Luling Hwy 90 Group Site would alleviate the need for approximately 18 TTHU's 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 Draft EA include: the Clean Air Act; Clean Water Act (CWA); Endangered Species Act; National Draft Historic Preservation Act (NHPA); Executive Order (EO) 11988 (Floodplain Management); EO 11990 (Protection of Wetlands); EO 12898 (Environmental Justice); Comprehensive Environmental Response, Compensation and Liability Act (CERCLA); Resource Conservation and Recovery Act (RCRA); and Farmland Protection Policy Act (FPPA). Agency coordination/consultation is being conducted on a site-by-site basis as necessary.

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

4.0 SITE SELECTION PROCESS AND ALTERNATIVES

NEPA requires investigation and evaluation of reasonable project alternatives as part of the project environmental review process. At a minimum, FEMA's NEPA implementing regulations require that the No Action and Proposed Action be evaluated. In order to expedite the group housing site selection process, FEMA is working closely with local officials and the United States Army Corps of Engineers (USACE) to identify potential sites, followed by site reconnaissance and research to determine site suitability. Important factors considered in choosing a site include: demand for temporary housing in that area, group acceptance, proximity of group services/amenities (schools, healthcare facilities, public transportation, etc.), engineering and construction feasibility, access to utilities, land use compatibilities, property owner terms, costs to develop and maintain the site, and environmental/cultural resource sensitivities. FEMA will continue to evaluate alternative sites in St. Charles Parish. The Luling Hwy 90 Group Site was selected for further detailed analysis because it meets the basic site feasibility and selection criteria.

Alternative 1 – No Action Alternative

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

Alternative 2 – Develop the Luling Hwy 90 Group Site with MHUs (Proposed Action)

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

4.1 Project Site and Location Description

The project site is located at 14165 Highway 90, Boutte, Louisiana 70039 (Latitude:29.890311, -Longitude: -90.409987). Figure 1 is an aerial photo depicting the boundaries of the project site and adjacent area. The site is located south of Hwy 90 and west of Tiger Drive. The site is zoned for commercial retail and single-family units. Approximately 4 acres of the property would be developed. The site consists of mostly of flat grass with trees at the southern end. Hahnville High School is adjacent to the eastern half of the property. There are two mobile home parks (Mozella RV Park and Cypress Land RV Park) within a mile of the site. There is a residential community

bordering the western portion of the site, a high school on the eastern portion, Freshwater Forested/Shrub Wetland to the south, and commercial buildings to the north The site is leveled throughout at approximately 1 foot above sea level, and the surrounding topography is at an elevation of 1 to 5 feet above sea level.

Approximately 18 (TTHUs) would be placed in the proposed footprint to be used as temporary group site housing and would be located in the 100-year floodplain (AE Zone).

4.2 Proposed Action Description

The Proposed Action would utilize the project site and design to contract for the construction of approximately 18 TTHU's, green space, and all necessary support facilities (Figure #2). These pads would be used for the placement of MHUs to house displaced families.

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

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

- Site preparation would include clearing, grading, and removal of woody vegetation and debris.
- Infrastructure for public water and electrical services exist off Hwy 90 but would have to be extended onto the site.
- Infrastructure for sewer would consist of connection to an existing sewer off Hwy 90.
- New lines and fire hydrants, as required, would be installed on the property.
- Storm water drainage has been already developed within the site.
- Site features include approximately 15% of the units meeting Uniform Federal Accessibility Standard (UFAS), and 100% of on-site essential services/facilities (such as mailbox kiosk) would be UFAS compatible.
- Erosion control would be established during the construction period and a perimeter fence would be constructed around the project site.

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

5.0 AFFECTED ENVIRONMENT AND POTENTIAL IMPACTS

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

5.1 Soils

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

Per the United States Department of Agriculture Web Soil Survey https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx there are two (2) types of soil present on the site, Barbary muck, and Cancienne silty clay loam. Barbary muck is identified in Hydrologic Group D, which is identified by its very slow infiltration rate, poor drainage, and high run off potential. Cancienne silty clay loam is identified in Group C, which consists of soil that impedes downward movement and somewhat poorly drainage. Cancienne silty clay loam is identified as prime farmland soil.

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 Luling Hwy 90 Group Site with MHUs (Proposed Action)

The soils at the Luling Hwy 90 Group Site are considered prime farmland. FEMA completed the Site Assessment Criteria (Part VI) of the National Resources Conservation Service (NRCS) AD 1006 Farmland Impact Conversion Rating form by utilizing criteria explained in 7 CFR § 658.5(b).

FEMA's Total Site Assessment points (Part VI in the AD 1006 Form) of 19 is based on the following categories: Area in Non-urban Use (13 out of 15); Perimeter in Non-urban Use (1 out of 10); Percent of Site Being Farmed (0 out of 20); Protection Provided by State and Local Government. (0 out of 20); Distance from Urban Build-up Area (0 out of 15); Distance to Urban Support Services (0 out of 15); Size of Present Farmland Unit Compared to Average (0 out of 10); Creation of Non-farmable Farmland (0 out of 10); Availability of Farm Support Services (0 out of 5); On-Farm Investments (5 out of 20); Effects of Conversion on Farm Support Services (0 out of 10); and Compatibility with Existing Agricultural Use (0 out of 10). Total Site Assessment points (Part VI in the AD 1006 Form) less than 160 indicates a site need not be given further consideration for FPPA protection (per 7 CFR § 658.4(c)(3).

Therefore, although approximately 4 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 Draft EA to address requirements of the Louisiana Department of Environmental Quality (LDEQ) to observe precautions to control non-point source pollution, reduce erosion, and develop a Storm Water Pollution Prevention Plan (SWPPP) and implement the required conditions.

5.2 Water Resources

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

5.2.1 Water Quality

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

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

Impaired Waterbodies

Impaired waterbodies and streams are on the Louisiana CWA 303(d) list and are required to develop a total maximum daily load (TMDL). TMDLs are maximum amounts of pollutants that can be released in a waterbody or stream without causing the water to become impaired (violate state water quality standards). TMDLs for Non-Native Aquatic Plants (introduction of non-native organisms either accidental or intentional); Turbidity – forced drainage pumping, and sediment resuspension (clean sediment); Fecal Coliform - on-site treatment systems (septic systems and similar decentralized systems), packaged plant or other permitted small flows discharges, and wildlife other than waterfowl have been established for Paradise Canal to Bayou des Allemends to Lake Salvador. TMDL requirements are established in NPDES permits and through Best Management Practices (BMPs). BMPs are types of activities that are created to control or minimize pollutants from an area to water bodies of the state.

Alternative 1- No Action Alternative

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

Alternative 2 - Develop the Luling Hwy 90 Group Site with MHUs (Proposed Action)

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

In accordance with Section 401 and 402 of the CWA and the Louisiana Clean Water Code, coverage under the LPDES Storm Water General Permit for Large Construction Activities (greater than 5 acres) will be obtained for Luling Hwy 90 Group Housing Site construction activities. Coverage under the LPDES Storm Water General Permit for Large Construction Activities will implement a SWPPP that will meet the requirements of approved TMDLs for Paradise Canal.

The Luling Hwy 90 Group Housing Site is located approximately 5.0 miles of Bayou des Allemand, an impaired water, which is a waterbody or stream that is too polluted or otherwise degraded to meet the water quality standards set by states, territories, or authorized tribes. These actions would prevent any degradation of water quality from the construction and operational

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

5.2.2 Wetlands

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

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

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

Alternative 1- No Action Alternative

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

Alternative 2 - Develop the Luling Hwy 90 Group Site with MHUs (Proposed Action)

Under the Proposed Action Alternative, based on the United States Fish and Wildlife Services (USFWS) National Wetlands Inventory (NWI) map accessed on April 29, 2022, available online at (https://fws.gov/wetlands/), no wetlands or other water features are identified in the project area. The non-wetland determination is confirmed by a January 16, 2022, FEMA site visit. The inspector documented 13 acres of open field with opportunistic grasses covering the area.

In addition, a letter dated April 27, 2022, (Attachment 2), from the US Army Corps of Engineers, New Orleans District, confirms the proposed work is in uplands and not subject to jurisdiction under Section 404 of the Clean Water Act or Section 10 of the Rivers and Harbors Act. A Department of the Army permit was issued on September 20, 2006, to clear, grade and maintain fill at the proposed housing site for the construction of a multi-family housing complex. The site was cleared, graded and filled per permit specifications. However, this site is bound by the terms and conditions of the permit. The permit conditions are not an issue if the site is restored to its original condition at the conclusion of the housing mission.

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 Luling Hwy 90 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 Luling Hwy 90 Group Site, on April 26, 2022, revealed that there are no identified sole source aquifers on this site.

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

The primary source of fresh water in St. Charles Parish is the Mississippi River. In 2010, Mississippi River supplied 2,470Mhal/d of surface water which is used for industrial use, power generation, public supply and livestock.

Under the Proposed Action Alternative, construction activities are not anticipated to directly impact groundwater. The exact depth of excavation and grading at the Luling Hwy 90 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- and short-term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct or indirect support of floodplain development wherever there is a practicable alternative. FEMA's regulations for complying with EO 11988 are found at 44 CFR Part 9, Floodplain Management and Protection of Wetlands.

Alternative 1- No Action Alternative

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

Alternative 2 - Develop the Luling Hwy 90 Group Site with MHUs (Proposed Action)

Currently, there are 53 group site locations in St. Charles Parish that have undergone a review. It has been determined that 49 of these are not practicable, either being actively used, located in a wetland, not practicable in terms of cost, or the owner(s) is not interested in leasing the property to FEMA. Two sites have already completed EHP review and are undergoing lease neogiations. FEMA is continuing with the NEPA review process for the other 2 sites which are located in the Special Flood Hazard Area (SFHA).

FEMA has applied the 8-step process found in 44 CFR Part 9, and determined that there is no practicable alternative to building in the floodplain in St. Charles Parish (Attachment #1). Sites with shallower Base Flood Elevation (BFE) depths will be pursued for development before moving to sites with progressively deeper BFE depths. BFE is the elevation of surface water resulting from a flood that has a 1% chance of equaling or exceeding that level in any given year.

For the Luling Hwy 90 Group Site, the proposed project would satisfy 18 MHUs of the 77 needed units for the St. Charles Parish. Based on the FEMA Flood Insurance Rate Map (FIRM) panel number 22089C0145D (Figure #3), with an effective date of November 09, 2012 accessed on December 23, 2021, at (https://msc.fema.gov/portal/home), the proposed project is located Zone AE. An AE zone is an area having special flood, mudflow or flood-related erosion hazards and shown on a FIRM. The AE zone is in the floodplain.

To mitigate environmental, safety, and health risks to the occupants and the floodplain, MHUs will be elevated to the maximum height practicable. Coordination with the local floodplain administrator will occur prior to placement. Occupants will be provided with flood hazard safety protocols and included in local emergency evacuation plans.

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 open 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 temporarily stored on site will be appropriately covered to prevent erosion.

FEMA has determined that constructing the Luling Hwy 90 Group Site in the AE Zone would result in minimal impacts to and within floodplains provided certain BMPs are followed (see Section 7.0 Mitigation) and (Attachment 1). In addition, MHUs are temporary housing solutions that are not anticipated to remain in place beyond 18 months.

5.3 Coastal Zone Management

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

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

Pursuant to the CZMA, the State and Local Coastal Resources Management Act of 1978 (LA Revised Statute [R.S.] 49:214:21 et seq. Act 1978, No. 361) is the state of Louisiana's legislation creating the Louisiana Coastal Resources Program (LCRP). The LCRP establishes policy for activities including construction in the coastal zone, defines and updates the coastal zone boundary, and creates regulatory processes. The LCRP is under the authority of the LDNR Office of Coastal Management (OCM). If a proposed action is within the coastal zone boundary, OCM will review the eligibility of the project prior to its review from other Federal agencies (USACE, USFWS, and

National Marine Fisheries Service [NMFS]). The mechanism used to review these projects is the Coastal Use Permit (CUP). Per the CZMA, all proposed Federal projects within the coastal zone must undergo a "Consistency Determination" by OCM for that project's consistency with the state's Coastal Resource Program (i.e., LCRP).

Alternative 1- No Action Alternative

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

Alternative 2 - Develop the Luling Hwy 90 Group Site with MHUs (Proposed Action)

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

5.4 Threatened and Endangered Species and Critical Habitat

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

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

Alternative 1- No Action Alternative

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

Alternative 2 - Develop the Luling Hwy 90 Group Site with MHUs (Proposed Action)

Per USFWS Information for Planning and Consultation (IPaC) website accessed on April 27, 2022, there are no federally listed endanged or threatened species within the project area.

Inspection of the proposed site did not indicate the presence of any species federally listed as threatened or endangered. The USFWS's IPaC website (https://ecos.fws.gov/ipac/), accessed on April 27. 2022, was reviewed for a list of threatened and endangered species in the project area.

A search of the USFWS Critical Habitat online mapper and ArcGIS Map on April 27, 2022 resulted in a finding of no designated critical habitats in the project area. The following webpages were reviewed for critical habitats in the project area:

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

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

5.5 Cultural Resources

The consideration of impacts to historic and cultural resources is mandated under Section 101(b)(4) of NEPA as implemented by 40 CFR Parts 1501-1508. Consideration of effects to historic properties as a result of Federal Undertakings is also mandated by Section 106 of the National Historic Preservation Act (NHPA) as implemented by 36 CFR Part 800. Direct Temporary Housing Assistance in the form of constructing TTHU Group Sites meets the definition of a Federal Undertaking. Accordingly, FEMA is conducting Section 106 review for the Undertaking in accordance with the Programmatic Agreement (PA) among FEMA, the Louisiana State Historic Preservation Officer (SHPO), Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP), and Participating Tribes, executed on December 21, 2016, as amended.

Alternative 1- No Action Alternative

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

Alternative 2 - Develop the Luling Highway 90 Group Site with MHUs (Proposed Action)

During the week of April 21, 2022, FEMA Historic Preservation Specialists consulted the Louisiana Office of Cultural Development's Cultural Resources National Register database, the Louisiana Cultural Resources Map and associated site files (Louisiana Division of Archaeology website), the US Department of Agriculture Web Soil Survey maps (USDA Website), various digital archival resources, photos, historic maps, and FEMA's internal files in order to identify the presence of historic properties.

The proposed Undertaking's footprint is not located within any districts that are listed in or that have been previously determined eligible for listing in the National Register of Historic Places (NRHP), nor are there any recorded, eligible archaeological sites within the boundaries of the project site. The nearest archaeological site is approximately 1.5 miles northeast from the project area. The scope of work has been reviewed and meets the criteria in the PA, Appendix B - Programmatic Allowances, Tier II.A.5.a., b and II.D.1.a., b. In accordance with this PA, FEMA is not required to determine the NRHP eligibility of properties where work performed meets the Appendix B criteria. As such, FEMA has documented this determination in the project files, and considers the Undertaking Section 106 compliant without SHPO or tribal review or notification.

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

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

5.6 Socioeconomic Resources

The project site is located in St. Charles Parish, Louisiana. United States Census Bureau (USCB), the population as of April, 2020, was 52,282 with a total of 21,000 households. The median household income was estimated at approximately $68,113 (in 2019 dollars). According to the 2019 USCB Estimates, approximately 11.3% 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 1.7% Two or More Races. The demographic makeup of the group site residents is expected to be similar to the community as a whole (Table 1)

Table 1: Project Population Data[1]

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	52,282	70.2%	26.5%	1.1%	6.4%	0.4%	0.1%	1.7%	11.3%	21,000	$68,113
Louisiana	4,624,047	62.8%	32.8%	1.8%	5.3%	0.8%	0.1%	1.8%	17.8%	1,739,497	$49,469

[1] Data Source, USCB 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

5.6.1 Environmental Justice

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

Alternative 1- No Action Alternative

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

Alternative 2 - Develop the Luling Hwy 90 Group Site with MHUs (Proposed Action)

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

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

The Proposed Action would utilize the project site and design to contract for the construction of approximately 18 TTHU's and all necessary support facilities. The potential site residents would be from areas within the parish which have been impacted by the flooding. The local community is aware of this action and may experience a slight localized increase in the need for public services, such as schools, fire and police services, childcare, and medical services. However, the overall demand for public and commercial services is not expected to be greater than the pre-disaster demand and potential impacts are expected to be minimal.

5.7 Hazardous Materials

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

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

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

Alternative 1- No Action Alternative

No impacts from hazardous materials are expected as a result of no federal actions.

Alternative 2 - Develop the Luling Hwy 90 Group Site with MHUs (Proposed Action)

Upon review of the Phase 1 Environmental Site Assessment (ESA) Report with GeoCheck© on April 28, 2022, nine (9) surrounding properties were identified. Within approximately 0.25 miles of the group site there are three (3) RCRA small quality generators, per review of this EDR report, no violations were noted., six (6) facilities have underground storage tanks (USTs), not voliations were noted, except for Racetrac # 488 Additionally Two (2) water wells are within a ¼ mile from the site. Water well ID 089-5386Z is plugged and abandoned, and Water Well ID 089-5279Z is currently active. Lastly three (3) orphan drums are also listed in the EDR report, but due to poor or inadequate address information, those sites are not mapped.. Site remediation was performed at the following facilities:

Racetrac #488

Racetrac 488 is a gas station and convenience store located approximately 538 feet north of the proposed Luling Hwy 90 group at 14165 Highway 90, Boutte, Louisiana 70039 (Latitude: 29.890311, -Longitude: -90.409987). This facility is at an elevation, relatively higher than the proposed group site; this increases the potential of contamination migrating towards the Luling Hwy 90 group site. In May of 2021, Leaafe Environmental LLC reported that upon analytical review of groundwater sampling data from an RDD well associated with the underground storage system (UST), it was determined concentrations of Benzene (0.0137 mg/l) were above the RECAP 2003 GW_SS 0.005 mg/l. This sampling was conducted to repair the underground storage tanks. Per a Lousiana Department of Environmetnal Quality Incident Report dated 6/14/2021, all spill buckets appear to be intact and free of cracks. On 6/7/2021 the two RDDs in the western tank hold did not contain free product.

Any unusable equipment, debris, and material on site would be disposed of prior to occupancy in an approved manner and location. In the event significant items (or evidence thereof) are discovered during implementation of the project, petroleum products, hazardous materials, and toxic waste will be handled, managed, and disposed of in accordance to the requirements and to the satisfaction of the governing local, state, and federal agencies. Based on the Phase 1 ESA

Report review, the impacts from hazardous materials and hazardous substances are unknown because on ongoing remediation of Racetrac #488.

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 Hwy-90. Hwy-90 connects to Interstate 310 (I-310) to the east and LA-306 to the west. I-310 connects Boutte to Almedia. LA-306 connects to Bayou Gouche.

Alternative 1- No Action Alternative

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

Alternative 2 - Develop the Luling Hwy 90 Group Site with MHUs (Proposed Action)

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

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

6.0 PUBLIC INVOLVEMENT

Public involvement is being performed in compliance with the NEPA, FEMA's Instruction 108-1-1 for implementing NEPA, and EOs 12898, 11988, and 11990. FEMA has prepared a public

notice for public comment and public review for the Draft EA. FEMA has requested for posting of the notice on the websites of GOHSEP, St. Charles Parish Goverment, and St. Charles Parish Public Library. This Draft EA is available at the following website is https://www.fema.gov/emergency-managers/practitioners/environmental-historic/region/6.

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

Written comments on the Draft EA can be sent via email to dr-4611-fema-ehp-ia@fema.dhs.gov. When responding by email, please reference the project name, "**Temporary Housing – Luling Hwy 90 Group Housing Site (SC-6)**" in the subject field. If no substantive comments are received, the Draft EA and Finding of No Significant Impact (FONSI) will become final and no further public noticing will be conducted.

7.0 MITIGATION

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

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

1. Any change to the approved scope of work will require re-evaluation for compliance with NEPA and other Laws and Executive Orders.

2. This review does not address all federal, state, and local requirements. Acceptance of federal funding requires the recipient (i.e., State) to comply with all federal, state, and local laws. Failure to obtain all appropriate federal, state, and local environmental permits and clearances may jeopardize federal funding.

3. Coordination with the local floodplain administrator must occur prior to MHU placement. All coordination pertaining to these activities and Applicant compliance with any conditions should be documented and copies forwarded to the state and FEMA for inclusion in the permanent project files.
4. Compliance with State Regulations: Placement of MHUs or other readily fabricated dwellings must be in accordance and in compliance with Louisiana regulations.

5. Local Permitting and Codes: Any FEMA units will be installed in compliance with applicable local codes, ordinances and permitting requirements. Any contracted logistics installation entities (installers) for TTHU placement will secure all pertinent Federal, state, and local permits and approvals before work.
6. Health and Safety: Before unit occupancy, the responsible program, will provide Applicants with a Health and Safety Advisory regarding the flood hazard, local emergency evacuation plans, right-of-entry during an emergency, and possible unit haul off.
7. The responsible program will ensure the local emergency manager has information regarding location of TTHU occupants and potential special needs, to integrate into local emergency plans.
8. Appropriate best management practices will be implemented during site development to minimize sediment migration from the site into nearby water bodies. Surface runoff will be controlled by using siltation controls such as silt fencing around the construction site to minimize erosion of materials into adjacent wetlands and/or waterways. Any disturbed soil will be protected with seed or sod after construction in order to decrease the amount of soil eroded by rainfall and runoff. Any fill stored on site will be appropriately covered to prevent erosion.
9. The Contractor shall comply with 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.
10. During the decommissioning of the Luling Hwy 90 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.
11. 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.
12. Unusable equipment, debris and material will be removed or disposed of prior to occupancy in an approved manner and location.
13. 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.

14. 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.

15. 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.

16. 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.

17. Once the temporary housing need has ended, FEMA expects that all manufactured housing units (MHUs) would be hauled from the site in accordance with Section 408(d)(2) of the Stafford Act and returned to a FEMA storage facility. Furthermore, the project site would be either reasonably restored to its previous condition and then seeded or left with the site improvements per the lease terms negotiated between the GSA and the landowner.

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

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

20. In accordance with 44 C.F.R. 9.13(d) (4) (i), MHUs placed in a Special Flood Hazard Area (SFHA) must be elevated to the fullest extent practicable up to the Base Flood Elevation (BFE) and adequately anchored.

8.0 LIST OF PREPARERS

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Deputy Housing EHP Advisor (EHAD):

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

Table 2: Summary Table—Affected Environment, Impacts, and Mitigation

Resource Area	Alternative 1- No Action Alternative	Alternative 2 - Proposed Action: Develop the Group Site with MHUs	Mitigation	Agency Coordination/ Permits
Soils	No change from current conditions.	Three (3) of the soils at the Luling Hwy 90 site are considered prime farmland. FEMA's rating resulted in a total of 19 out of 160. In accordance with 7 CFR 658.4(c)(2), "sites receiving a total score of less than 160 (combined FEMA score total and NRCS score total) need not be given further consideration for protection and no additional sites need to be evaluated."	No mitigation required	No agency coordination
Water Quality	No change from current conditions.	There is potential for localized increase in sedimentation as a result of site preparation activities. Potential impact to water quality in downstream swales, ditches, and streams (e.g., turbidity, siltation, biological oxygen demand).	Appropriate BMPs will be implemented during site development to minimize sediment migration from the site into nearby water bodies. Surface runoff will be controlled by using siltation controls such as silt fencing around the construction site to minimize erosion of materials into adjacent wetlands and/or waterways. Any disturbed soil will be protected with seed or sod after construction in order to decrease the amount of soil eroded by rainfall and runoff. Any fill stored on site will be appropriately covered to prevent erosion. If the project results in a discharge to waters of the State, a Louisiana Pollution Elimination System (LPDES) permit may be required in accordance with the Section 401 of the CWA and the Louisiana Clean Water Code.	LDEQ may require a LPDES permit in accordance with the Sections 401 and 402 of the CWA and the Louisiana Clean Water Code.

Wetlands	No change from current conditions.	There are no wetlands on the project site.	No MHUs will be installed on the Project site where wetlands occur.	USACE
Floodplains	No change from current conditions.	MHUs would be installed within the 100-year floodplain.	MHUs will be elevated to the maximum height practicable. Coordination with the local floodplain administrator will occur prior to placement. Occupants will be provided with flood hazard safety protocols and included in local emergency evacuation plans.	Local Floodplain Administrator
Coastal Zone Management	No change from current conditions.	MHUs would be installed in a designated coastal zone.	No mitigation required	In a OCM response letter dated September 29, 2021 (Consistency number C20210142), the OCM concurred with FEMA's negative determination, as described by National Oceanic and Atmospheric Administration (NOAA) regulations on federal consistency at 15 CFR § 930.
Ground Water	No change from current conditions.	Under the Proposed Action, there are no anticipated direct impacts to groundwater.	No mitigation required	Department of Health, and LDEQ
Threatened and Endangered Species and Critical Habitat	No change from current conditions.	No effects to Threatened and Endangered Species and no Critical Habitat on the Project Site.	No mitigation required	No agency coordination
Cultural Resources	No change from current conditions.	The scope of work has been reviewed and meets the criteria in Appendix B - Programmatic Allowances, Tier	If during the course of work, archaeological artifacts (prehistoric or historic) are discovered, the Contractor shall stop all work in the vicinity of	Per the Programmatic Agreement, project is covered under the following

		II.A.5.a., b. and II.D.1.a., b. In accordance with this PA, FEMA is not required to determine the National Register eligibility of properties where work performed meets the Appendix B criteria. As such, FEMA has documented this determination in the project files, and considers the Undertaking Section 106 compliant without SHPO or tribal review or notification.	the discovery and take all reasonable measures to avoid or minimize harm to the finds. The Contractor shall inform their Individual Assistance (IA) contacts at FEMA, who will in turn contact FEMA Historic Preservation staff. The Contractor will not proceed with work until FEMA completes consultation with the SHPO and others, as appropriate.	Allowances: II.A.5.a., b and II.D.1.a., b.
Environmental Justice	No change from current conditions.	The Proposed Action would not pose disproportionately high and adverse public health or environmental effects on minority and low-income populations.	No mitigation required	No agency coordination
Hazardous Materials	No change from current conditions.	Under the Proposed Action, there are no anticipated impacts from hazardous materials and hazardous substances.	Unusable equipment, debris and material will be disposed of prior to occupancy in an approved manner and location. In the event significant items (or evidence thereof) are discovered during implementation of the project, petroleum products, hazardous materials, and toxic waste will be handled, managed, and disposed of in accordance to the requirements and to the satisfaction of the governing local, state, and federal agencies.	None or LDEQ
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	LDOTD

			traffic safety measures and management protocols for the area.	

Figures

Figure 1: Aerial Photo and Vicinity of Proposed Luling Hwy 90 Group Site

Figure 2: Luling Hwy 90 Group Site Proposed Layout

Figure 3: Luling Hwy 90 Flood Insurance Rate Map (FIRM)

Figure 4: Photograph of Existing Site Conditions at the Proposed Luling Group Site Facing north to south

Figure 5: Photograph of Existing Site Conditions at the Proposed Luling Hwy 90 Group Site Facing west to east

Attachments

EXECUTIVE ORDER 11988/11990
FLOODPLAIN MANAGEMENT/WETLANDS – CHECKLIST (44 CFR Part 9)

APPLICANT:	SC-06 Luling Hwy 90 Group Site
PARISH/STATE:	St. Charles, LA
COORDINATES:	Latitude: 29.890311, -Longitude: -90.409987
PROPOSED ACTION:	Provide MHU Housing at SC-06 Luling Hwy 90 Group Site. The Proposed Action would utilize the project site and design to contract for the construction of approximately 18 manufactured housing unit (MHU) pads, green space, and all necessary support facilities. These pads would be used for the placement of MHUs to house displaced families. Development of the site would require the installation of utilities on the site; gravel for site leveling, MHU pads, resident parking, and roads; and concrete for UFAS parking areas.

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

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

Remarks:

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

Remarks:

ACTION:

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

☒**Review against 100 Year floodplain**

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

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

Entire project is located within an “AE” zone, area of 100-yr flooding, per Flood Insurance Rate Map (FIRM) panel 22089C0145D, dated 11/09/2012.

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

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

Posted Online: Fema_DR-4611-IDA-LA-initial-public-notice_102021.pdf

Date: 10/01/2021

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

Type of Public Notice:

Date:

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

Alternative Options

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

If yes, provide the site location:

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

If yes, describe the alternative action:

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

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

REMARKS: The Direct Housing Assessment Team (DHAT), comprised of FEMA and State representatives, has monitored, and will continue to monitor FEMA housing needs to identify eligible households that are likely to have a need for temporary housing assistance. Specific information being collected includes the number of eligible households, location of eligible households, special needs, and quantity of bedrooms required by each household. Needs assessments are based on household composition and the number of occupied bedrooms recorded when the inspection is conducted.

FEMA's National Processing Services Center has utilized internet searches, reviewed public listings, made inquiries to state social service organizations and reviewed local advertisements to determine available rental resources. After reviewing available mapping data and rental resource databases and making onsite observations of disaster-related damage(s) and present living conditions of local residents, DHAT has determined that alternate housing resources in the affected area cannot meet the demand for housing.

Returning disaster survivors to their pre-disaster communities is the preferred alternative due to the direct positive impacts the returning citizens have on stimulating the local economy and rebuilding the overall sense of community, thereby reducing the amount of time it takes a community to recover from a disaster. This solution provides survivors with reasonable commuting time to workplaces, schools, childcare, and places of worship, as well as familiar food, shopping services, laundry facilities, playgrounds, and pet areas. When survivors are placed outside their neighborhoods, additional infrastructure, and other services such as access to education, public transportation, emergency services, and healthcare facilities are often required, and the resources of host communities can become strained.

The policy of returning disaster survivors to their pre-disaster communities is consistent with the guidance outlined under the FEMA DHAT Standard Operating Procedures which states, “an effort should be made to keep applicants within a Reasonable Commuting Distance: A distance that does not place undue hardship on an applicant.” (Individual Assistance Program and Policy Guide, March 2019). In addition, the solution to return survivors to their pre-disaster communities aligns with the unique factors used to analyze practicable alternatives under 44 CFR,9.13(d)(3).

To fulfill the housing needs, DHAT has compiled a site feasibility list of potential private residences, commercial park sites, MLRs, Direct Lease properties, and potential group site locations for placing Manufactured Housing Units (MHUs) or Travel Trailers (TTs). First priority has been given, and will continue to be given, to the placement of MHUs/TTs on private/owner sites and commercial parks, these being the most expedient and most cost-effective options. When these options are not sufficient to accommodate the housing needs of a parish, then site locations for Group Housing within the commuting area are being utilized. Priority is then given to group sites that can be expediently prepared for MHUs/TTS, have existing utility connections and ingress/egress to the site, require minimal ground disturbance, and are located outside the Wetlands and 100-year Floodplain.

The availability of potential private residences and commercial park sites for placing MHUs/TTs in St. Charles Parish is becoming depleted and the availability of group sites outside the floodplain is exhausted.

Based on the analysis by the Direct Housing Team, FEMA has determined that the practicable alternatives are exhausted under CFR Part 9 and will allow for development and placement of direct housing resources, Manufactured Housing Units and Recreational Vehicles/Travel Trailers in FEMA developed, leased and managed group site locations, within the Special Flood Hazard Area (SFHA).

The Direct Housing team has completed a review and analysis of potential group sites and the depth of base flood elevations (BFEs) to support FEMA built and managed group site housing operations. FEMA has and continues to analyze alternatives outside of the floodplain against

the available resources and are documenting this decision process by way of data analytics and GIS mapping. FEMA continues to prioritize the placement of manufactured housing units (MHUs) over Recreational Vehicles (RVs) or Travel Trailers (TTs) in any SFHA.

Group sites in the SFHA are triaged in a process whereby those sites with shallower Base Flood Elevations (BFEs) are prioritized for development before moving to sites with progressively deeper BFEs in the effort to secure enough housing pads to satisfy the geographical need. Priority of these sites will also satisfy the geographic population density need with the most benefit of pad site development and timeliness.

As of May 06, 2022, based on applicant call outs, it is estimated that approximately 163 households will require direct temporary housing assistance in St. Charles. While approximately half of this need has been met with private and commercial sites, there remains a balance of 77 units needed which could be filled through group site locations.

Currently, there are 53 group site locations in St. Charles Parish that have undergone a review. It has been determined that 49 of these are not practicable, either being actively used, located in a wetland, not practicable in terms of cost, or the owner(s) is not interested in leasing the property to FEMA. FEMA is continuing with the National Environmental Policy Act (NEPA) review process for the other 2 sites which are located in the SFHA.

For the SC-06 Luling Hwy 90 Group Site, the proposed project would satisfy 18 MHUs of the 97 needed units. It has been determined that there is no practicable alternative to the development of the Luling Hwy 90 site.

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

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

☐**N/A** Remarks:

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

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

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

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

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

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

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

☐ **N/A** Remarks:

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

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

☐ **N/A** Remarks:

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

☐ **N/A** Remarks:

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

REMARKS:

The conversion of agriculture land into a site for MHUs will require clearance of vegetation and the addition of hard surfaces. This would temporarily eliminate 4 acres of agricultural land used for raising crops and would result in water run-off into the floodplain area, reducing the ability of the floodplain to store water and absorb run-off, thereby increasing the flood hazard potential to other nearby properties and the duration of that flooding.

These impacts would occur for up to 18 months, when the occupants return to their repaired/reconstructed homes.

Wetlands would not be impacted by the proposed project.

Step 5 provides more details regarding dredging or filling of a floodplain/wetland.

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

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

☐ **N/A** Remarks:

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

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

☐ **N/A** Remarks:

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

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

☐ **N/A** Remarks:

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

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

☐ **YES** ☐ **NO**

REMARKS: Only clean fill materials from a commercial source would be utilized in construction of the group site. All excavated materials would be relocated into a non-floodplain area either on site or at an approved location off site. Silt fencing will be used during construction to prevent materials from migrating off site.

Health, safety, and welfare of the occupants and floodplain is promoted by installing an above-ground self-contained sewage packing plant. The resulting grey water will be pumped directly into Boudreaux Canal. The facility will comply with state and federal regulations for the point source pollutants created by packaging plants into surface water to also include existing streams. Drinking water for the MHUs will be supplied by the public water supply. Electricity will be sourced from nearby power poles and electric lines will be run in safety-approved conduits to each MHU.

All units will be constructed in accordance with U.S. Department of Housing and Urban Development (HUD) and FEMA standards, which enhance frame requirements, thermal protection, plumbing and fire safety. All units will have smoke detectors, weather radios and fire extinguishers.

Occupants of MHUs placed in the floodplain will be advised of flood threats to health and safety per DAP9453.3, Disaster Assistance Directorate Guidance Memorandum, dated 10/17/2008, and will be required to sign an acknowledgement that they have received and understand the risk involved. The responsible program, before unit occupancy, will provide applicants with a Health and Safety Advisory regarding the flood hazard, local emergency evacuation plans, etc. (See Condition #4 below)

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

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

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

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

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

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

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

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

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

☒ Final public notice will be issued on the websites of St. Charles parish, St. Charles public library, GOHSEP, and FEMA.gov.

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

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

Conditions

1. **Coordination with the local floodplain administrator** must occur prior to placement. All coordination pertaining to these activities and applicant compliance with any conditions should be documented and copies forwarded to the state and FEMA for inclusion in the permanent project files.
2. **Compliance with State Regulations:** Placement of MHUs or other readily fabricated dwellings must be in accordance and in compliance with Louisiana regulations.
3. **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.

4. **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.

Monitoring Requirements: None.

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

April 27, 2022

Regulatory Division

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

Dear Mr. Borden:

Reference is made to the request regarding a determination of wetlands on a potential Hurricane Ida Emergency Temporary Housing site, known as the Luling Highway 90 site. Specifically, this site is located in Section 20, Township 14 South, Range 20 East, St. Charles Parish, Louisiana.

A permit was issued for the site on September 20, 2006 to clear, grade, and maintain fill for construction of Mosella Townsite, a multi-family housing complex. The site was cleared, graded, and filled, and therefore, no wetlands remain on site. Compensatory mitigation for the impacts to the jurisdictional wetlands was required and completed accordingly with Smithport Planting and Wetland Services, Inc. on lands managed under the Greenwood Mitigation Area Interagency Agreement. However, this site is bound by the terms and conditions of that associated permit. For this reason, no additional authorization would be required to place emergency temporary housing provided that all associated appurtenances are removed following the cessation of the emergency temporary housing need, or a permit modification, consisting of as-built drawings, will be required for those appurtenances to remain in place.

To reiterate, the site now consists of previously authorized fill material, as all wetlands have been permitted and appropriately mitigated. However, an application for a permit modification will be required if all temporary housing units and all appurtenances are not removed, in their entirety, following the cessation of the emergency temporary housing need. Should there be any questions concerning these matters, please contact Mr. Brad Guarisco at (504) 862-2274 and reference our Account No. MVN-1999-02883-1-SB.

Sincerely,

Brad Guarisco
Digitally signed by Brad Guarisco
Date: 2022.04.27 21:01:17 -05'00'

for Martin S. Mayer
Chief, Regulatory Division

Enclosures

LULLING HWY 90
ST CHARLES PARISH, LOUISIANA
USACE PROPOSED LOT LAYOUT

15 MHU + 3 UFAS - ALL LOTS 100' LENGTH

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

USACE IH 4/27/2022

By: BRAD GUARISCO

For: BORDEN

(MVN-1999-02883-1-SB)

= PROJECT SITE

JOHN BEL EDWARDS
GOVERNOR

THOMAS F. HARRIS
SECRETARY

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