

Draft Environmental Assessment  
**EBR06 Victoria Group Housing  
Site**

FEMA-4277-DR-LA

East Baton Rouge Parish, Louisiana

*October 2016*



**FEMA**

U.S. Department of Homeland Security  
Federal Emergency Management Agency  
Region 6  
800 North Loop 288  
Denton, TX 76209

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## ACRONYMS AND ABBREVIATIONS

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APE	Area of Potential Effect
BMP	Best Management Practices
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CFR	Code of Federal Regulations
CWA	Clean Water Act
EA	Environmental Assessment
EIS	Environmental Impact Statement
EO	Executive Order
EPA	Environmental Protection Agency
ESA	Endangered Species Act
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FONSI	Finding of No Significant Impact
GSA	General Services Administration
IHP	Individuals and Households Program
LDEQ	Louisiana Department of Environmental Quality
MHU	Manufactured Housing Unit
MLRP	Multi-Family Lease and Repair Program
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NWI	National Wetlands Inventory
RCRA	Resource Conservation and Recovery Act
SHPO	State Historic Preservation Office
UFAS	Uniform Federal Accessibility Standard
USACE	United States Army Corps of Engineers
USCB	United States Census Bureau
USFWS	United States Fish and Wildlife Service

## **1. Introduction**

During the Incident Period of August 11, 2016, to August 31, 2016, prolonged rainfall occurred over the state of Louisiana dropping unprecedented rain, exceeding 20 inches. On August 14, 2016, President Obama declared a major disaster (FEMA-4277-DR-LA) for the State of Louisiana, due to the severe storms and subsequent flooding, authorizing the Department of Homeland Security's Federal Emergency Management Agency (FEMA) to provide federal assistance in designated areas. FEMA proposes to administer this disaster assistance pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), Public Law 93-288, as amended. Section 408 of the Stafford Act authorizes FEMA's Individual and Households Program (IHP) to provide emergency and temporary housing for eligible disaster survivors, whose homes are uninhabitable or destroyed as a result of the declared event.

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 Code of Federal Regulations Parts 1500-1508), and FEMA's procedures for implementing NEPA (FEMA Instruction 108-1-1). FEMA is required to consider potential environmental impacts before funding or approving actions and projects. This Draft EA will analyze the potential environmental impacts of the proposed temporary group housing, Victoria Group Site, as part of an expedited review process. FEMA will use the findings in this Draft EA to determine whether to prepare an Environmental Impact Statement (EIS) or a Finding of No Significant Impact (FONSI).

## **2. Purpose and Need**

Catastrophic damage from severe storms and flooding has resulted in an extraordinary demand for housing assistance in communities within East Baton Rouge Parish, one of the hardest hit areas in Louisiana. The August 2016 prolonged rainfall resulted in catastrophic flooding and has been called the nation's worst natural disaster since Hurricane Sandy in 2012.

Thousands of homes and businesses were submerged and officials estimated that 75 percent of homes in East Baton Rouge Parish were a total loss. Many rivers and waterways, particularly the Amite and Comity rivers, reached record levels, and rainfall exceeded 20 inches in multiple parishes.

Louisiana's governor, John Bel Edwards, called the disaster a "historic, unprecedented flooding event" and declared a state of emergency. Because of the large number of homeowners without flood insurance that were affected, the federal government is providing disaster aid through FEMA.

The purpose of this action is to fulfill FEMA's mandate under the IHP to expeditiously provide temporary housing for eligible disaster survivors. As of October 15, 2016, the State had received 150,855 requests for federal assistance. Approximately 13,021 (total Pre-Placement Interviews) are for temporary housing assistance in the East Baton Rouge Parish area.

Most of this demand will be met by repairing and improving existing multi-family housing to be utilized as temporary housing, placing a manufactured housing unit (MHU) on an applicant's private site, or providing them with a MHU on an available pad leased in a commercial park. However, once these options are exhausted, FEMA estimates many applicants still will remain in need of direct housing, thus supporting the need to develop a temporary group-housing site, hereafter "group site."

### **3. 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 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; Endangered Species Act; National Historic Preservation Act; 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. 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 reduce or minimize adverse effects. This Draft EA examines the site-specific environmental impacts associated with building a proposed FEMA group-housing site on private or publicly owned land to be leased by the General Service Administration (GSA) for this purpose.

This Draft EA was prepared based on a site evaluation, document research, and resource agency information. The public participation period will be brief as necessitated by the emergency circumstances. Agency coordination and consultation will be deemed complete at the end of the public comment period. FEMA believes that this process will allow for sufficient action analysis and meet the goal of providing timely federal assistance to disaster survivors.

### **4. 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 the No Action and Proposed Action be evaluated. Concurrent to the Proposed Action, other federally assisted housing options are being utilized first. These options include minor home repairs, rental assistance, and installing a manufactured housing unit on a private site or in an existing commercial site but these options are rapidly depleting due to the high demand. Therefore, a remaining alternative is to build an emergency, temporary group-housing site when the above options do not satisfy the demand.

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 a 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 East Baton Rouge Parish. Although various alternatives have been and continue to be identified, the amount of needed housing has limited this Draft EA to analysis of one suitable site alternative. The Victoria 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 other temporary locations until they resolve their own long-term housing needs. This alternative may jeopardize public health, safety, and well-being and thus it would not address the project's purpose and need.

### ***Alternative 2 – Develop the Group Site at Victoria with MHU's (Proposed Action)***

The Proposed Action would provide temporary housing for eligible displaced residents by August 2016 floods in southeastern Louisiana. Eligible displaced residents 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 solution needs. This alternative would assist in fulfilling FEMA's mandate under the IHP to expeditiously provide temporary housing for eligible displaced residents. This alternative would also address the proposed project's purpose and need.

## **4.1 Project Location and Site Description**

The proposed site (figure 1) is located along Victoria Drive, City of Baton Rouge, East Baton Rouge Parish, Louisiana 70805 (30.47732, -91.117450). In 2005, approximately 4.8 acres of the site was considered for use as a Temporary Group Housing Site for Federally Declared Disaster DR-1603/1607-LA (Attachment 1).

The Victoria Group Site consists of approximately 8 acres, which form a T-shaped parcel of land (figure 2). Current design configuration allows for up to 35 manufactured home pads. The central rectangular portion of the site, approximately 4.8 acres, is relatively flat. Adjacent to the north and south are smaller rectangular shaped parcel. The north parcel, approximately 1.4 acres in size is relatively flat with scattered live oak and pine and pecan trees, and remnants of concrete building slabs. The south parcel is approximately 1.4 acres in size, is relatively flat with scattered live oak and pine and pecan trees, and an abandoned one story ranch house and remnants of

concrete pad. The entire site is located 0.5 miles north of Greenwell Springs Road (a.k.a LA Highway 37), and south of Winbourn Avenue. Across the street from the site are several private residences, and the Greater Mount Olive Baptist Church which are also the current owners of the proposed project site. The site property is bordered to the north by chain link fences. A shallow drainage ditch along the southern boundary drains into a storm sewer manhole near Victoria Drive. The proposed site plan does not include any undertakings in the immediate area of the abandoned property which sits on the south parcel.

#### **4.2 Proposed Project Description**

The proposed action would utilize a design for the construction of 35 manufactured home pads. These 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, asphalt for the roads and handicap parking lot and crushed rocks for trailer pads and residents parking.

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 water, sewer, and electrical services exist off of Victoria Road but would have to be extended onto the site.
- New lines and hydrants would be installed on the property for all units.
- Storm water drainage would be developed within the site as well.
- Uniform Federal Accessibility Standard (UFAS) site features include 20% of the units meeting UFAS, and 100% of onsite 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. 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, soils and seismicity, air quality, climate change, coastal zones, wildlife and fish, noise, traffic, public

service and utilities, and public health and safety. Where potential impacts exist, conditions or mitigation measures to offset these impacts are detailed. Table 1 summarizes the results of the environmental review process. No safety issues were identified on the project site.

## **5.1 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.

### **5.1.1 Water Quality**

The National Pollutant Discharge Elimination System (NPDES) was established under the Clean Water Act (CWA) and regulates wastewater discharges from point sources. NPDES regulations require that construction sites resulting in greater than one acre of disturbance obtain a permit from the Environmental Protection Agency (EPA), or the corresponding state agency where the permitting role has been assumed by the state. The Louisiana Department of Environmental Quality (LDEQ) is the state agency that has assumed this responsibility.

#### ***Alternative 1- No Action Alternative***

Under the No Action alternative, there would be no short- or long-term impacts to water quality.

#### ***Alternative 2 - Develop the Group Site at Victoria with MHUs (Proposed Action)***

Appropriate best management practices (BMPs) would be implemented during site development to minimize sediment migration from the site into nearby water bodies. Surface runoff would 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 would be protected with seed or sod after construction in order to decrease the amount of soil eroded by rainfall and runoff. If fill is stored on site, the contractor would appropriately cover it to prevent erosion. In order to control storm water runoff, the contractor would be required to construct drainage features so that flows would not cause nuisance flooding during heavy rainfall events. The drainage system would be required to meet local and parish requirements.

These actions would prevent any degradation of water quality as a result of silt-laden runoff from the construction site. The Proposed Action alternative would have no significant impacts to water quality in the area of the site.

### **5.1.2 Wetlands**

The CWA and 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***

Under the No Action alternative, there would be no short- or long-term impacts to wetlands.

### ***Alternative 2 - Develop the Group Site at Victoria 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 October 15, 2016, available online at (<https://fws.gov/wetlands/>), no wetlands were identified in the project area.

## **5.1.3 Floodplains**

EO 11988 Floodplain Management was issued to avoid or minimize long and short- term adverse impacts associated with the occupancy and modification of floodplains.

### ***Alternative 1- No Action Alternative***

Under the No Action alternative, there would be no short- or long-term impacts to floodplains.

### ***Alternative 2 - Develop the Group Site at Victoria with MHUs (Proposed Action)***

Based on the FEMA Flood Insurance Rate Map (FIRM) panel number 22033C0255F dated 06/19/2012, accessed on October 15, 2016, at (<https://msc.fema.gov/portal>), the proposed project is located in a X- other flood area zone and would not adversely affect floodplain values.

## **5.2 Threatened and Endangered Species and Critical Habitat**

Section 7 of the Endangered Species Act (ESA) 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 is the agency that regulates compliance with the ESA. Furthermore, migratory birds are protected by the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act. 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 for complying with the appropriate regulations and implementing appropriate conservation measures.

### ***Alternative 1- No Action Alternative***

Under the No Action alternative, there would be no short- or long-term impacts to threatened and endangered species or critical habitat.

### ***Alternative 2 - Develop the Group Site at Victoria with MHUs (Proposed Action)***

The USFWS's Information for Planning and Conservation website (<https://ecos.fws.gov/ipac/>) accessed on October 5, 2016 was reviewed for a list of threatened and endangered species in the

project area. While there are four listed species and 29 migratory birds that occur in the East Baton Rouge Parish, the proposed site does not contain suitable habitat for any of these listed species.

A search of the USFWS Critical Habitat online mapper accessed on October 15, 2016 at (<http://ecos.fws.gov/ecp/report/table/critical-habitat.html>) resulted in a finding of no designated critical habitats in the project area.

Based on the scope of work and lack of suitable habitat at the proposed site, FEMA has made the determination that the Proposed Action alternative would have no effect to federally listed species and would not adversely modify critical habitat.

### **5.3 Cultural Resources**

Section 106 of the National Historic Preservation Act (NHPA) of 1966 (16 U.S.C. §470 *et seq.*) and its implementing regulations (36 CFR Part 800), require federal agencies to take into account the effects of their undertakings on historic properties.

#### ***Alternative 1- No Action Alternative***

Under the No Action alternative, there would be no short- or long-term impacts to cultural resources.

#### ***Alternative 2 - Develop the Group Site at Victoria with MHUs (Proposed Action)***

FEMA has defined the Area of Potential Effect (APE) for the proposed undertaking as the maximum horizontal and vertical limits of excavation and construction, as well as all areas of ground disturbance, clearing and grubbing, staging, or equipment operation. Based on a review of the Louisiana Cultural Resources Mapper and site reconnaissance, FEMA has determined that the APE does not include any above or below ground historic properties listed in or eligible for the National Register of Historic Places (NRHP). FEMA has determined that there would be no historic properties affected as a result of the Proposed Action. The State Historic Preservation Office (SHPO) concurred with this determination in letters dated September 26, 2016 and October 17, 2016. (attachment 2).

The contractor would monitor ground-disturbing activities and if any potential archeological resources are discovered, would immediately cease construction in that area and notify the Louisiana Governor's Office of Homeland Security and Emergency Preparedness, and FEMA.

## **5.4 Socioeconomic Resources**

The project site is located in the East Baton Rouge Parish, Louisiana. According to the United States Census Bureau (USCB), the population as of July 15, 2015 was 446,753 with a total of 189,353 housing units. The median household income was estimated at approximately \$48,535 (based on 2010 -2014 American Survey 5-year Estimates). According to the 2010 -2014 American Survey 5-year Estimates, approximately 18.4% of population lives below poverty levels.

### **5.4.1 Environmental Justice**

EO 12898 requires that each federal agency identify and address the effects of its programs, policies, and activities on minority and low-income populations. The function of this EO is to avoid disproportionately high and adverse public health or environmental impacts to the target populations. The population within East Baton Rouge Parish, Louisiana is comprised of about 46% Caucasian, 46% African American, 3% Asian, 4%Hispanic and 1% other.

#### ***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 residents would have to remain in the temporary housing they have acquired through their own resources and possibly far from their original home. The short- and long-term recovery of displaced residents and their communities would be further compounded by fewer housing options. They would continue to experience social and economic stresses related to the disaster recovery.

#### ***Alternative 2 - Develop the Group Site at Victoria 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 requirements. This group site is a temporary housing solution. Therefore, long-term adverse effects to public health or to the environment would not be expected.

The demographic makeup of the group site residents is expected to be similar to the community as a whole. Further, 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.

With the establishment of the site, up to approximately 87 residents could be temporarily relocated to the Victoria Group Site. The potential site residents would be from the Parish areas 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. Therefore, 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.

#### **5.4.2 Hazardous Materials**

Two of the main federal laws that address hazardous and toxic materials issues are CERCLA and RCRA. CERCLA, commonly known as Superfund, has the major objectives to identify hazardous and toxic material sites, determine liability, and oversee the cleanup. RCRA addresses the handling, disposal and recycling of debris and solid waste, including hazardous materials.

Upon review of EPA NEPA Assist (<https://nepassisttool.epa.gov/nepassist/nepamap.aspx>) there are no facilities or activities of concern on the proposed group site. Also, upon review of the Environmental Data Resources Radius Map Report with GeoCheck on October 17, 2016, there are no facilities or activities of concern on the proposed group site. This was confirmed by a site visit to the proposed site. However, this database did report out that within a 0.25 mile radius, there are one business as Small Quantity Generator, four businesses as Conditionally Exempt Small Quantity Generators, two businesses as RCRA NonGenerators meaning they once were Hazardous Waste Generators but no longer, and one businesses as active Underground Storage Tank. There are no Superfund sites at or nearby the project location.

#### ***Alternative 1- No Action Alternative***

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

#### ***Alternative 2 - Develop the Group Site at Victoria with MHUs (Proposed Action)***

Under the Proposed Action alternative, there are no anticipated impacts from hazardous materials and hazardous substances. Any unusable equipment, debris and material on site 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, the contractor would handle, manage, and dispose of petroleum products, hazardous materials, and toxic waste in accordance to the requirements and to the satisfaction of the governing local, state, and federal agencies.

### **6. Cumulative Impacts**

Cumulative impacts are defined as environmental effects that are greater in magnitude, extent, or duration than the direct and indirect effects of the proposed FEMA-associated action when combined with the effects of other current and future actions, regardless of the proponent. Given the Proposed Action is temporary, long-term (up to 18 months) cumulative affects to the area surrounding the site as a result of site development and occupancy are not anticipated.

## **7. Public Involvement**

Public involvement is being performed in compliance with NEPA, FEMA's Instruction 108-1-1 for implementing NEPA, and EO 12898, 11988, and 11990. A Notice of Availability of the Draft EA will be published in the local newspaper of record, the The Advocate, and on FEMA's website at (<https://www.fema.gov/library>) requesting public comments.

Additionally, the Draft EA will be made available for review at the Main Library of the East Baton Rouge Public Library, located at 7711 Goodwood Blvd., Baton Rouge, LA 70806. The Main Library facility hours are Monday to Thursday, 8:00 a.m. to 10:00 p.m., Friday and Saturday, 8:00 a.m. to 6:00 p.m., and Sunday 2:00 p.m. to 10:00 p.m.. Due to the emergency nature of this action, the public comment period will be limited to 3 days. FEMA will consider and respond to all public comments in the Final EA. If no substantive comments are received, the Draft EA will become final and a FONSI will be issued for the project.

## **8. Mitigation**

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

1. 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 any 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.
2. In order to control storm water runoff, the contractor will be required to design drainage features so that flows will not cause nuisance flooding during heavy rainfall events. The drainage system will be required to meet local and parish requirements.
3. The contractor will monitor ground-disturbing activities during construction. If any potential archeological resources are discovered, the contractor will immediately cease construction in that area and notify the Louisiana Governor's Office of Homeland Security and Emergency Preparedness and FEMA.
4. 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, the contractor will handle, manage, and dispose of petroleum products, hazardous materials, and toxic waste in accordance to the requirements and to the satisfaction of the governing local, state, and federal agencies.
5. To minimize dust, site soils will be wetted during site preparation activities, and seeded following construction.

6. 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 must meet all local, State, and federal noise regulations.
7. The contractor will post appropriate signage and fencing 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.
8. Once the temporary housing need has ended, the site will be seeded and restored to previous conditions to the extent practical or in accordance with site lease terms.

## **9. List of Preparers**

EA Preparer: Kim A. Valente, Environmental Specialist, FEMA

Field Team: Richard Beatty, Environmental Specialist, FEMA; Kim A. Valente, Environmental Specialist, FEMA

Reviewers: Kevin Jaynes, Regional Environmental Officer, Region 6 FEMA; Alan Hermely, Environmental Specialist, Region 6 FEMA; Kenneth R. Sims, NEPA Team Lead, USACE, Adam Borden, FEMA Deputy Environmental Advisor

Table 1: Summary Table—Affected Environment, Impacts, and Mitigation

Resource Area	No Action Alternative	Alternative 2 Proposed Action: Develop the Group Site at Victoria with Mobile Home Units	Mitigation	Agency Coordination/ Permits
Water Quality	No change from current conditions.	Appropriate BMPs would be implemented during site development to minimize sediment migration from the site into any water bodies. Any disturbed soil would be protected with seed or sod after construction in order to decrease the amount of soil eroded by rainfall and runoff. If fill is stored on site, the contractor would appropriately cover it to prevent erosion.	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 any 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.	Applicant must coordinate with the LDEQ and obtain required permits prior to initiating work.  All coordination pertaining to these activities and applicant compliance with any conditions would be documented and copies forwarded to the state and FEMA for inclusion in the permanent project files.
Wetlands	No change from current conditions.	No wetland identified at site location.	None	None
Floodplains	No change from current conditions.	Not in floodplain	None.	None
Threatened and Endangered Species and Critical Habitat	No change from current conditions.	No Threatened and Endangered Species and Critical Habitat on the Proposed Site.	None.	None
Cultural Resources	No change from current conditions.	FEMA has determined that there would be no historical properties affected as a result of the Proposed Action. The SHPO concurred with this determination in two correspondence dated September 26, 2016 and October 17, 2016.	The contractor would monitor ground-disturbing activities and if any potential archeological resources are discovered, would immediately cease construction in that area and notify the Louisiana Governor's Office of Homeland Security and Emergency Preparedness and FEMA.	FEMA has consulted with SHPO and obtained concurrence on September 26, 2016 and October 17, 2016

Resource Area	No Action Alternative	Alternative 2 Proposed Action: Develop the Group Site at Victoria with Mobile Home Units	Mitigation	Agency Coordination/ Permits
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.	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 must meet all local, State, and federal noise regulations.	None
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, the contractor will handle, manage, and dispose of petroleum products, hazardous materials, and toxic waste in accordance to the requirements and to the satisfaction of the governing local, state, and federal agencies.	None



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**FEMA**

**PROGRAMMATIC CATEGORICAL EXCLUSION**  
GROUP TEMPORARY EMERGENCY HOUSING  
*FEMA-1603/1607-DR-LA – Individual and Households Program*

**Site Name/Number:** Victoria Farms Site/EB-36

**City:** Baton Rouge **Parish:** East Baton Rouge

**I. Background**

As a result of Hurricanes Katrina and Rita, catastrophic wind and flood damage occurred respectively on August 29 and September 23, 2005, and continuing in parishes of Louisiana. The Federal Emergency Management Agency (FEMA), per the Robert T. Stafford Disaster Relief and Emergency Assistance Act, P.L. 93-288, as amended, issued a Presidential disaster declaration on August 26, 2005 (FEMA-1603-DR-LA) and September 24, 2005 (FEMA-1607-DR-LA) to provide Federal assistance to areas of Louisiana designated as major disaster areas. The Governor of the State of Louisiana has requested assistance under FEMA's Individual and Households Program (IHP) for temporary housing.

**II. Scope of Work**

The scope of work under this Programmatic Categorical Exclusion (PCE) is for placement of emergency temporary housing, to include travel trailers or manufactured housing, on suitable private/commercial/public sites; and rehabilitation of existing private/commercial/public buildings. Specifically:

- (1) Multiple travel trailers/manufactured housing in existing RV/mobile home parks and campgrounds with pre-existing utilities.
- (2) Travel trailers/manufactured homes on improved areas where utilities will be above ground or not extend beyond previously disturbed ground. Examples include parking lots and paved areas at conference centers, shopping malls, airports, drive-in theaters, business parks, military bases, etc.
- (3) Construction/rehabilitation work for apartments within an existing, structurally sound building(s). Examples include hotels, abandoned schools, warehouses, office buildings, base facilities, etc.

**III. Categorical Exclusion Citation**

Through experience, FEMA has found that the placement or construction of temporary housing as described above and with the conditions indicated below, has minimal or no effect on the environment. For the purpose of complying with the requirements of the National Environmental Policy Act (NEPA), FEMA has also found that its funding of the temporary housing activities defined above is categorically excluded from full NEPA review by either category 44 CFR part 10.8(d)(2)(xvi),

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PCE – Group Temporary Housing  
Page 2

“Improvements to existing facilities and the construction of small scale mitigation measures in existing developed areas with substantially completed infrastructure, when the immediate project area has already been disturbed, and when those actions do not alter basic functions, do not exceed capacity of other system components, or modify intended land use; provided the operation of the completed project will not, of itself, have an adverse effect on the quality of the human environment.”

or 44 CFR part 10.8(d)(2)(xvii)

“Actions conducted within enclosed facilities where all airborne emissions, waterborne effluent, external radiation levels, outdoor noise, and solid and bulk waste disposal practices comply with existing Federal, state, and local laws and regulations;”

or 44 CFR part 10.8(d)(2)(xix),

“The following emergency and disaster response, recovery and hazard mitigation activities under the Stafford Act:

...  
(D) Temporary Housing, except locating multiple mobile homes or other readily fabricated dwellings on sites, other than private residences, not previously used for such purposes;”

In particular, the temporary housing activities defined in (1) above qualifies for the categorical exclusion defined in section (xix)(D), (2) qualifies for (xvi), and (3) qualifies for (xvii).

#### **IV. Conditions**

In addition, for this Programmatic Categorical Exclusion to apply for temporary housing, FEMA has determined that each project, as identified, meets the appropriate following conditions:

- a) Must meet all applicable State, parish, and local utility hook-up, and housing codes and standards (including certificate of occupancy); or applicable waivers if issued; and
- b) Must obtain and comply with all necessary federal, State, local permits (or waivers, if issued); and
- c) For structures, complete necessary inspection for asbestos containing materials and lead based paint; including abatement as required; and
- d) If any hazardous materials are found during construction or occupation, all hazardous materials shall be remediated, abated, or disposed of as appropriate, and otherwise handled in accordance with applicable local, state, and federal laws and regulations; and
- e) Must have access to existing services, including but not limited to electric, water and sewer, or be self-serviced; and
- f) Action meets programmatic consultation completed with the LA State Historic Preservation Officer on September 14, 2005, *or* site specific consultation has been completed (and is attached) with a finding of no effects on historic properties that have not been addressed in accordance with Section 106 of the National Historic Preservation Act. If during the placement of temporary housing previously unidentified archeological resources are discovered, work in the affected area must stop until FEMA and the Louisiana State Historic Preservation Officer (SHPO) can consult to evaluate the resource's

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historic significance. This requirement pertains to structures as well as archeological and cultural resources; and

- g) Action meets blanket consultation completed with US Fish and Wildlife Service on September 19, 2005 (FEMA-1603-DR-LA) and September 27, 2005 (FEMA-1607-DR-LA), *or* informal consultation has been completed (and is attached) with a no effect finding, in accordance with the Endangered Species Act; and
- h) There are no unaddressed Environmental Justice issues associated with the site; and
- i) Action is out of the floodplain or complies with Executive Order 11988; and
- j) Action does not affect wetlands or complies with Executive Order 11990.

This PCE *may not* be used for projects that involve extraordinary circumstances as described in 44 CFR Part 10.8(d)(3), and/or other circumstances that would require additional environmental documentation, including if the following are present:

- a) Long-term effects associated with the destruction or modification to wetlands or the direct or indirect support of construction in wetlands (Executive Order 11990);
- b) Long-term effects associated with occupancy of, or modification to floodplains, and the direct and indirect support of floodplain development (Executive Order 11988);
- c) Unabated known hazardous or toxic material contamination;

Significant change, addition and/or supplement to the placement of temporary emergency housing which would alter the pre-existing condition of any site, including additional work not funded by FEMA but performed substantially at the same time, will require resubmission to FEMA for re-evaluation under the National Environmental Policy Act and other applicable environmental and historic preservation laws.

Each action under II (2) or (3) for which this Programmatic Categorical Exclusion serves as the means of NEPA compliance must be documented with a Record of Environmental Consideration (Long form for II (2) and Short form for II (3)) (attached) containing: the project title and number; the project location; indication of which of the above categories applies; and affirmation that each of the above conditions have been met. When appropriate, backup correspondence and documentation should be attached. This could include floodplain maps, SHPO concurrence and ESA findings. Upon review and approval by the Environmental Liaison Officer or a designee, the appropriate Record of Environmental Consideration and this document will be deemed to have fulfilled the requirements of NEPA and the action may be funded if otherwise eligible.

For qualifying projects, this review will be deemed adequate to meet the demands of the Endangered Species Act, National Historic Preservation Act, and Executive Orders related to Protection of Wetlands (EO 11990) and Floodplains (EO 11988). It has also been determined that these actions do not have the potential to adversely or disproportionately affect minority or low income populations as described in Executive Order 12898, Environmental Justice.

Approved:

\_\_\_\_\_  
Donald R. Fairley, REM  
Environmental Liaison Officer  
FEMA-1603/1607-DR-LA

\_\_\_\_\_  
Date

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PCE – Group Temporary Housing  
Page 4

cc: FEMA Individuals and Household Program Officer  
FEMA Contractor

Attachment 2. September 23, 2016 FEMA State Historic Preservation Officer coordination letter, page 1 (with SHPO concurrence stamp).

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.



Phil Boggan  
State Historic Preservation Officer

Date

09/26/2016

U.S. Department of Homeland Security  
Federal Emergency Management Agency  
FEMA-4277-DR-LA  
Joint Field Office  
415 North 15<sup>th</sup> Street  
Baton Rouge, LA 70802



FEMA

September 23, 2016

Mr. Phillip E. Boggan II  
State Historic Preservation Officer  
Department of Culture, Recreation & Tourism  
P.O. Box 44247  
Baton Rouge, LA 70804

Dear Mr. Boggan,

The Federal Emergency Management Agency (FEMA), in response to the Presidentially declared Major Disaster Declaration FEMA-DR-4277-LA (Incident Period- August 11, 2016 to August 31, 2016) will be providing direct temporary housing assistance, or "direct assistance," under the Individuals and Households Program, Sections 408 and 502 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, P.L. 93-288, as amended. Per 44 CFR Part 206, FEMA is authorized to provide temporary housing units directly to individuals and households who, because of a lack of available resources, are unable to make use of rental assistance for temporary housing.

As per the Programmatic Agreement among FEMA, the Louisiana State Historic Preservation Officer, the Louisiana Governor's Office of Homeland Security and Emergency Preparedness, the Alabama-Coushatta Tribe of Texas, the Caddo Nation, the Chitimacha Tribe of Louisiana, the Choctaw Nation of Oklahoma, the Coushatta Tribe of Louisiana, the Jena Band of Choctaw Indians, the Mississippi Band of Choctaw Indians, the Quapaw Tribe of Oklahoma, the Seminole Nation of Oklahoma, the Seminole Tribe of Florida, the Tunica-Biloxi Tribe of Louisiana, and the Advisory Council on Historic Preservation, executed August 17, 2009, and amended on July 22, 2011 (2009 Statewide PA as amended) ground-disturbing activities related to the construction of temporary housing sites are not included in the temporary housing activities included in Section 408: Federal Assistance to Individuals and Households (42 U.S.C. 5174) for which FEMA has no further Section 106 responsibilities per Stipulation I.C.1. of the 2009 Statewide PA as amended.

FEMA is initiating consultation for the proposed temporary housing locations, to be used to house individuals and families whose homes were rendered uninhabitable as a result of DR-4277.

Manufactured Housing Units (MHU's) are provided to eligible applicants in parishes only as a last resort when no other reasonable alternative exists for emergency housing. These actions may include placing sets of MHU's at newly developed "Group Sites" located in impacted parishes. Group Sites are only approved when setting individual MHU's on private property, or utilizing a

previously developed commercial site are not available options. East Baton Rouge Parish has been identified as eligible for the installation of “Group Sites”.

**Project Description**

For group housing sites, cleared, level locations within close proximity to affected communities are generally selected for consideration. Sites are generally leveled and prepared for the installation of both the MHU’s and associated utilities. The MHU’s being used for the DR-4277 disaster are different from the housing units used in other Louisiana federal disaster declarations. All units are constructed in accordance to U.S. Department of Housing and Urban Development (HUD) and FEMA standards, which enhance frame requirements, thermal protection, plumbing and fire safety. All units have smoke detectors, weather radios, and fire extinguishers. MHU’s range from one to three bedrooms depended on the size of the occupying family.

The East Baton Rouge Victoria Location is an approximately 4.5 acre cleared lot which was used for temporary housing after Katrina between 2005 and 2007. This location has been maintained and kept free from vegetation since its original use as a temporary housing facility, and was likely disturbed as a result of previous use.

**Area of Potential Effect**

36 CFR § 800.4 requires federal agencies to define the Area of Potential Effect (APE). Summarized project locations with dimensions of disturbance are provided below and attached maps defines limits of the APE associated with this undertaking.

**Table 1-** Proposed Group Site Housing Location, East Baton Rouge Parish.

<b>Location</b>	<b>Northwest Corner</b>	<b>Northeast Corner</b>	<b>Southeast Corner</b>	<b>Southwest Corner</b>
EBR Victoria	30.47775, -91.11740	30.47784, -91.11513	30.47711, -91.11514	30.47706, -91.11733

**Identification of Historic Properties**

36 CFR 800.4(b) (1) of these regulations states that federal agency officials shall make a “reasonable and good faith effort” to identify historic properties.

FEMA conducted research using the Louisiana Division of Archaeology’s Cultural Resource database and associated site files, photographs, and maps to identify historic properties within the vicinity of the APE. There are no reported surveys associated with the East Baton Rouge Victoria location as of September 23, 2016. There are no known archaeological or historic sites within the vicinity of the Victoria Location.

**Findings of Effect**

Based on information gathered through this review process, FEMA has made a determination of **No Potential to Affect Historic Properties** as a result of the proposed undertaking.

To ensure that FEMA-funded activities would not affect significant archaeological resources, FEMA would place the following conditions on the project for the treatment of unexpected archaeological discoveries during debris removal activities:

*In the event that human remains or intact archaeological deposits are discovered, work in the vicinity of the discovery will stop immediately and all reasonable measures to avoid or minimize harm to the finds will be taken. The applicant will ensure that archaeological discoveries are secured in place, that access to the sensitive area is restricted, and that all reasonable measures are taken to avoid further disturbance of the discoveries. The applicant's contractor will provide immediate notice of such discoveries to the applicant. The applicant will notify the Louisiana Office of Cultural Development and FEMA within 24 hours of the discovery. Work in the vicinity of the discovery may not resume until FEMA has completed consultation with SHPO, Tribes, and other consulting parties as necessary. In the event that unmarked human remains are encountered during permitted activities, all work shall stop immediately and the proper authorities notified in accordance with Louisiana Code.*

Thank you very much for your assistance with this request. Due to the urgent need to provide safe housing to those affected by the disaster, your prompt attention to this matter would be greatly appreciated. Should you have any questions or need to discuss the proposed activities in greater detail, you may contact Emily Benz, Historic Preservation Specialist at [Emily.J.Benz@fema.dhs.gov](mailto:Emily.J.Benz@fema.dhs.gov) or 940-218-0883. We look forward to your response.

Sincerely,



Kevin Jaynes  
Regional Environmental Officer  
FEMA-4277-DR-LA

U.S. Department of Homeland Security  
Federal Emergency Management Agency  
FEMA-4277-DR-LA  
Joint Field Office  
415 North 15<sup>th</sup> Street  
Baton Rouge, LA 70802



October 13, 2016

Mr. Phillip E. Boggan II  
State Historic Preservation Officer  
Department of Culture, Recreation & Tourism  
P.O. Box 44247  
Baton Rouge, LA 70804

Dear Mr. Boggan,

The Federal Emergency Management Agency (FEMA), in response to the Presidentially declared Major Disaster Declaration FEMA-DR-4277-LA (Incident Period- August 11, 2016 to August 31, 2016) will be providing direct temporary housing assistance, or “direct assistance,” under the Individuals and Households Program, Sections 408 and 502 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, P.L. 93-288, as amended. Per 44 CFR Part 206, FEMA is authorized to provide temporary housing units directly to individuals and households who, because of a lack of available resources, are unable to make use of rental assistance for temporary housing.

As per the Programmatic Agreement among FEMA, the Louisiana State Historic Preservation Officer, the Louisiana Governor’s Office of Homeland Security and Emergency Preparedness, the Alabama-Coushatta Tribe of Texas, the Caddo Nation, the Chitimacha Tribe of Louisiana, the Choctaw Nation of Oklahoma, the Coushatta Tribe of Louisiana, the Jena Band of Choctaw Indians, the Mississippi Band of Choctaw Indians, the Quapaw Tribe of Oklahoma, the Seminole Nation of Oklahoma, the Seminole Tribe of Florida, the Tunica-Biloxi Tribe of Louisiana, and the Advisory Council on Historic Preservation, executed August 17, 2009, and amended on July 22, 2011 (2009 Statewide PA as amended) ground-disturbing activities related to the construction of temporary housing sites are not included in the temporary housing activities included in Section 408: Federal Assistance to Individuals and Households (42 U.S.C. 5174) for which FEMA has no further Section 106 responsibilities per Stipulation I.C.1. of the 2009 Statewide PA as amended.

Manufactured Housing Units (MHU’s) are provided to eligible applicants in parishes only as a last resort when no other reasonable alternative exists for emergency housing. These actions may include placing sets of MHU’s at newly developed “Group Sites” located in impacted parishes. Group Sites are only approved when setting individual MHU’s on private property, or utilizing a previously developed commercial site are not available options. East Baton Rouge Parish has been identified as eligible for the installation of “Group Sites”.



FEMA is initiating consultation for the expansion of the East Baton Rouge Victoria temporary housing location. In a letter dated September 23, 2016 FEMA made a determination of **No Potential to Affect Historic Properties** as a result of the construction of the Victoria group housing location. Concurrence from the Louisiana State Historic Preservation Officer was received via email on September 26, 2016.

**Project Description**

For group housing sites, cleared, level locations within close proximity to affected communities are generally selected for consideration. Sites are generally leveled and prepared for the installation of both the MHU’s and associated utilities. The MHU’s being used for the DR-4277 disaster are different from the housing units used in other Louisiana federal disaster declarations. All units are constructed in accordance to U.S. Department of Housing and Urban Development (HUD) and FEMA standards, which enhance frame requirements, thermal protection, plumbing and fire safety. All units have smoke detectors, weather radios, and fire extinguishers. MHU’s range from one to three bedrooms depended on the size of the occupying family.

The proposed location is on the east side of Victoria Drive, 0.5 miles north of Greenwell Springs Rd. in Baton Rouge, Louisiana. The proposed expansion involves two smaller rectangular shaped parcels on the north and south side of the original 4.8 acre Victoria location along Victoria Dr. The northern parcel is approximately 1.4 acres in size and the southern parcel is approximately 1.6 acres in size. These two smaller parcels contain scattered live oak and pine trees. There is an abandoned house and a concrete house pad on the southern parcel. The addition of the two parcels will increase the size of the Victoria location to 7.8 acres and would hold up to 25 mobile home units.

**Area of Potential Effect**

36 CFR § 800.4 requires federal agencies to define the Area of Potential Effect (APE). Summarized project locations with dimensions of disturbance are provided below and attached maps define limits of the APE associated with this undertaking.

**Table 1-** Proposed Group Site Housing Expansion Location, East Baton Rouge.

Location	Northwest Corner	Northeast Corner	Southeast Corner	Southwest Corner
Victoria North	30.47836 -91.11747	30.47839 -91.11661	30.47785 -91.11655	30.47783 -91.11745
Victoria South	30.47701 -91.11742	30.47707 -91.11610	30.47649 -91.11608	30.47646 -91.11739

**Identification of Historic Properties**

36 CFR 800.4(b) (1) of these regulations states that federal agency officials shall make a “reasonable and good faith effort” to identify historic properties.

FEMA conducted research using the Louisiana Division of Archaeology’s Cultural Resource database and associated site files, photographs, and maps to identify historic properties within the vicinity of the

APE. There are no reported surveys associate with the East Baton Rouge Victoria location as of October 13, 2016. There are no known archaeological or historic sites within the East Baton Rouge Parish Victoria Expansion location.

**Findings of Effect**

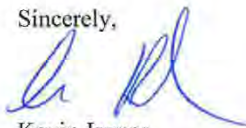
Based on information gathered through this review process, FEMA has made a determination of **No Potential to Affect Historic Properties** as a result of the proposed Undertaking.

To ensure that FEMA-funded activities would not affect significant archaeological resources, FEMA would place the following conditions on the project for the treatment of unexpected archaeological discoveries during debris removal activities:

*In the event that human remains or intact archaeological deposits are discovered, work in the vicinity of the discovery will stop immediately and all reasonable measures to avoid or minimize harm to the finds will be taken. The applicant will ensure that archaeological discoveries are secured in place, that access to the sensitive area is restricted, and that all reasonable measures are taken to avoid further disturbance of the discoveries. The applicant's contractor will provide immediate notice of such discoveries to the applicant. The applicant will notify the Louisiana Office of Cultural Development and FEMA within 24 hours of the discovery. Work in the vicinity of the discovery may not resume until FEMA has completed consultation with SHPO, Tribes, and other consulting parties as necessary. In the event that unmarked human remains are encountered during permitted activities, all work shall stop immediately and the proper authorities notified in accordance with Louisiana Code.*

Thank you very much for your assistance with this request. Due to the urgent need to provide safe housing to those affected by the disaster, your prompt attention to this matter would be greatly appreciated. Should you have any questions or need to discuss the proposed activities in greater detail, you may contact Andria Darby, Historic Preservation Specialist at [andria.darby@fema.dhs.gov](mailto:andria.darby@fema.dhs.gov) or 413-329-1860. We look forward to your response.

Sincerely,



*for*  
Kevin Jaynes  
Regional Environmental Officer  
FEMA-4277-DR-LA

References:

Aerial Map  
LA Cultural Resources Map  
Photos



**Map 1:** Aerial, East Baton Rouge Victoria Location APE, Google Earth, imagery date 8/26/2015.



Map 2: LA Cultural Resource Viewer, East Baton Rouge Victoria Location APE, 10/13/2016.



**Photo 1:** Victoria North, October 2016. Looking east from Victoria Dr.



**Photo 2:** Victoria North, October 2016. Looking west from east end.



**Photo 3:** Victoria South, October 2016.



**Photo 4:** Victoria South, October 2016. Looking south.

Attachment 2. SHPO concurrence email and electronic stamp for October 13, 2016 FEMA State Historic Preservation Officer coordination letter.

**From:** [Darby, Andria](#)  
**To:** [DCRT Section 106](#)  
**Cc:** [Mike Varnado](#); [Chip McGimsey](#); [Rachel Watson](#); [Nicole Hobson-Morris](#); [Kristin Sanders](#)  
**Subject:** FEMA-SHPO Consultation - Group Housing East Baton Rouge Parish, Victoria Expansion  
**Date:** Thursday, October 13, 2016 4:06:25 PM  
**Attachments:** [DR\\_4227-LA\\_SHPO\\_Consult\\_Group\\_Housing\\_EBR\\_Victoria\\_Expansion.pdf](#)

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Good Afternoon,

Please accept the attached consultation regarding emergency temporary housing facilities in East Baton Rouge Parish, LA.

Please contact me if you have any questions.

Sincerely

**Andria Darby**  
Historic Preservation Lead  
FEMA EHP  
DR-4277-LA  
BB: (413) 329-1860  
andria.darby@fema.dhs.gov

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.



Phil Boggan  
State Historic Preservation Officer

Date

10/17/2016

Figure 1. Area map showing major roads and streets near proposed project (Latitude 30.47752, Longitude -91.11750).

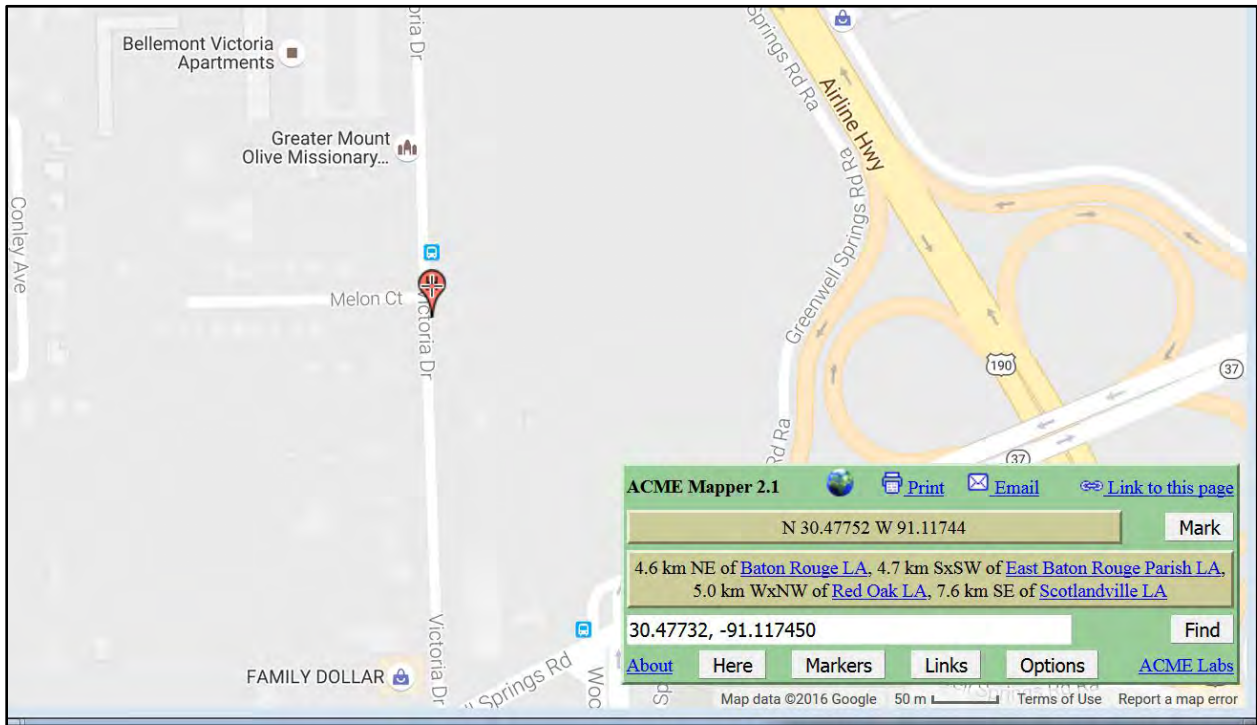


Figure 2. Aerial photo of proposed site and vicinity.





Figure 3. Photo of existing site conditions looking southwest with Victoria Drive in far background (typical).



Figure 4. Photo of existing site conditions, northern parcel.



Figure 5. Photo of existing site conditions, southern parcel.



Figure 6. Proposed Site Layout

