

Draft Environmental Assessment  
**McCloud Plantation Group  
Housing Site (LF-4)**

FEMA-4611-DR-LA

Lockport, Lafourche Parish, Louisiana

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**FEMA**

**U.S. Department of Homeland Security**  
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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, Public Law No. 93-288, as amended (Stafford Act) in designated areas of Louisiana impacted by the hurricanes. Under this authority FEMA may provide direct temporary housing when there is a lack of available housing resources for eligible disaster victims whose homes are uninhabitable or destroyed as a result of the declared event.

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

This Environmental Assessment (EA) has been prepared in accordance with the National Environmental Policy Act (NEPA) of 1969, the President's Council on Environmental Quality regulations to implement NEPA (40 CFR Parts 1500-1508), and FEMA's procedures for implementing NEPA (FEMA Instruction 108-1-1). FEMA is required to consider potential environmental impacts before funding or approving actions and projects. This EA will analyze the potential environmental impacts of the proposed temporary group housing, McCloud Plantation 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 January 11, 2022, based on applicant call outs, FEMA estimates that approximately 1,198 households will require direct temporary housing assistance in Lafourche Parish. While approximately half of this need has been met with private and commercial sites, there remains a need for 559 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 Lafourche 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 McCloud Plantation Group Site would alleviate the need for approximately 291 housing units in Lafourche Parish.

### **3.0 ENVIRONMENTAL REVIEW PROCESS**

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

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



## **4.0 SITE SELECTION PROCESS AND ALTERNATIVES**

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

### ***Alternative 1 – No Action Alternative***

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

### ***Alternative 2 – Develop the McCloud Plantation Group Site with MHUs (Proposed Action)***

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

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

The McCloud Plantation Group Housing Site is located at 170 McCloud Road, Lockport, Louisiana (Latitude: 29.651813, Longitude: -90.522364). Figure #1 is an aerial photo depicting the boundaries of the project site and adjacent area. The proposed project site is approximately 69 acres and is located in the northeast corner of the larger 136-acre McCloud Plantation. The selected site is currently 100% used and zoned as farmland.

The Career Magnet Center (a vocational school) briefly adjoins a portion of the western boundary of the group site, with Highway 308 located just beyond it. Southwest of Highway 308 is Bayou Lafourche. Along the entire northern boundary of the group site is a gravel public road that also serves as access to the Lockport Elevated Wetlands Boardwalk. The east boundary of the group site property is defined by the Louisiana Delta Railroad, with active farmland stretching eastward beyond it. Adjacent to the southern boundary are scattered houses located along McCloud Road. There is also a recent townhome development along the southwest corner of the site.

For purpose of ingress/egress, right-of-way access to the group site property would be acquired from three location points. Two of these access locations would be from McCloud Road on the southwest and southeast corners of the group site, and the third access location would be from Highway 308 on the north side of the group site.

Approximately 291 mobile home units (MHUs) would be placed in the proposed footprint to be used as temporary group site housing. Approximately 50% of these would be located in the 100-year floodplain.

#### **4.2 Proposed Action Description**

The Proposed Action would utilize the project site and design to contract for the construction of approximately 291 manufactured housing unit pads, green space, and all necessary support facilities (Figure #2). These pads would be used for the placement of MHUs to house displaced families.

The Undertaking for 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 (ADA) parking areas; site lighting; and a perimeter fence around the property. The exact depth of excavation and grading is unknown but would likely not exceed 3.5 feet for utility trenching and 10 feet for the sewage wet pumps.

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

- Site preparation would include clearing, grading, and removal of crop vegetation.
- Infrastructure for public water exists off McCloud Road and electrical services would be metered near the county road connecting to Highway 308, but these utilities would need to be extended onto the site.
- Infrastructure for sewer would consist of a packaged sewage treatment plant on site.
- New lines and fire hydrants, as required, would be installed on the property.
- Storm water drainage would be developed within the site.

- Site features include approximately 15% of the units meeting Uniform Federal Accessibility Standard (UFAS), and 100% of on-site essential services/facilities (such as mailbox kiosk) would be UFAS compatible.
- Erosion control would be established during the construction period and a perimeter fence would be constructed around the project site.

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

## **5.0 AFFECTED ENVIRONMENT AND POTENTIAL IMPACTS**

This section is organized by individual resources. It includes a description of the existing conditions at the project area and provides an analysis of potential environmental impacts for each alternative. Impacts to the following resources as a result of the Proposed Action were found to be discountable and are not evaluated further in this 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.

USDA soil survey map on January 11, 2022, shows this proposed group site as approximately 69 acres of prime farmland. The USDA soil survey shows Cancienne silt loam soil, somewhat poorly drained soils, with 0-1% slopes.

### ***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 McCloud Plantation Group Site with MHUs (Proposed Action)***

The soils at the McCloud Plantation 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 42 is based on the following categories: Area in Non-urban Use (11 out of 15); Perimeter in Non-urban Use (6 out of 10); Percent of Site Being Farmed (20 out of 20); Protection Provided by State and Local Government (0 out of 20); Distance from Urban Build-up Area (5 out of 15); Distance to Urban Support Services (0 out of 15); Size of Present Farmland Unit Compared to Average (0 out of 10); Creation of Non-farmable Farmland (0 out of 10); Availability of Farm Support Services (0 out of 5); On-Farm Investments (0 out of 20); Effects of Conversion on Farm Support Services (0 out of 10); and Compatibility with Existing Agricultural Use (0 out of 10). 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 69 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 Lafourche Parish. The Proposed Action must comply with the mitigation measures discussed in Section 7 of this EA to address requirements of the Louisiana Department of Environmental Quality (LDEQ) to observe precautions to control non-point source pollution, reduce erosion, and develop a Storm Water Pollution Prevention Plan (SWPPP) and implement the required conditions.

## **5.2 Water Resources**

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

### **5.2.1 Water Quality**

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

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

### **Impaired waterbodies**

Impaired waterbodies and streams are on the Louisiana CWA 303(d) list and are required to develop a total maximum daily load (TMDL). TMDLs are maximum amounts of pollutants that can be released in a waterbody or stream without causing the water to become impaired (violate state water quality standards). TMDLs for Oxygen Demand have been established for Bayou Lafourche and Bayou L'Eau Bleu, which flow into the Intercoastal Waterway. 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 McCloud Plantation 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.

Discharges of gray water will be made directly into a drainage ditch that will flow into the riverine adjoining the western boundary of the group site. The riverine empties into Bayou Lafourche. The facility will be required to obtain all permits required for the discharge of sanitary wastewater. Based on the levels of permitting, the maximum level of discharge would not exceed 100,000 gallons per day.

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 McCloud Plantation Group Housing Site construction activities. Coverage under the LPDES Storm Water General Permit for Large Construction Activities will implement a SWPPP that will meet the requirements of approved TMDLs for Bayou Lafourche.

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

The McCloud Plantation Group Housing Site is located within 5 miles of Bayou Lafourche and Bayou L'Eau Bleu, two impaired waters, which are waterbodies or streams that are too polluted or otherwise degraded to meet the water quality standards set by states, territories, or authorized tribes. These actions would prevent any degradation of water quality from the construction and operational discharges. The Proposed Action Alternative would have no significant impacts to water quality in the area of the site.

### **5.2.2 Wetlands**

The CWA and Executive Order (EO) 11990 define wetlands as “those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated conditions. Wetlands generally include swamps, marshes, bogs, and similar areas”.

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

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

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

#### ***Alternative 2 – Develop the McCloud Plantation 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 January 5, 2022 available online at (<https://fws.gov/wetlands/>), no wetlands are identified in the project area.

In a letter dated 15 December 2021, the US Army Corps of Engineers (USACE), New Orleans District, identified a non-wetland regulated water (Stream) that is subject to jurisdiction under Section 404 of the Clean Water Act (see Attachment 3).

The regulated stream enters the Career Magnet Center’s property from the west and then continues to flow north around the perimeter of the Center’s property and then back east again (Figure #1). The stream briefly touches the west boundary line of the McCloud Plantation group site where the sewage packing plant would be located. In addition, the existing gravel county road that would provide access to the proposed group site crosses over this regulated stream. The current design would not require any dredging or filling of the regulated stream. If, during construction, this assessment changes, a Department of the Army permit will be required prior to any placement or redistribution of dredged or fill material into this water of the U.S.

### 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 McCloud Plantation 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 McCloud Plantation Group Site, on January 7, 2022, revealed that there are no identified sole source aquifers on this site.

The primary sources of groundwater in Lafourche Parish include the Mississippi River alluvial aquifer system and underlying Gramercy aquifer. The Mississippi River alluvial aquifer contains saltwater throughout Lafourche Parish. It is composed of fine to medium sand at the top of the aquifer, which grades to coarse sand and gravel in the lower part. Overlying the alluvial aquifer is a clayey surface. The base of the aquifer ranges from 50 to 450 feet. The aquifer discharges into rivers, canals, and lakes, and is also withdrawn by wells. The aquifer receives recharge from the Mississippi River on a seasonal basis and is also recharged by infiltration of rainfall, as well as vertical leakage from the underlying Gramercy aquifer. The Gramercy aquifer contains fresh groundwater in a small area of the northeastern tip of the parish and is the only known fresh groundwater underlying the parish. Recharge to the Gramercy aquifer is primarily from rainfall, but it also receives leakage from the overlying Mississippi River alluvial aquifer.

The primary source of fresh water in Lafourche Parish is the Bayou Lafourche, which is supplied with water from the Mississippi River at Donaldsonville LA. In 2010, Bayou Lafourche supplied all of the water used for public supply and accounted for nearly 60 percent of surface-water withdrawals (primarily used for industrial cooling purposes) in Lafourche Parish.

Under the Proposed Action Alternative, construction activities are not anticipated to directly impact groundwater. The exact depth of excavation and grading at the McCloud Plantation Group Site is unknown, but would likely not exceed 3.5 feet for utility trenching and 10 feet for two wet pump stations that are planned as part of a gravity sewage system. 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 McCloud Plantation Group Site with MHUs (Proposed Action)***

Currently, there are 37 group site locations in Lafourche Parish that have undergone a review. It has been determined that 28 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 NEPA review process for the other 9 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 Lafourche Parish (Attachment #2). 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 McCloud Plantation Group Site, the proposed project would satisfy 291 MHUs of the 559 needed units for the Lafourche Parish. Based on the FEMA Flood Insurance Rate Map (FIRM) panel number 22057C0370E (Figure #3), with an effective date of June 16, 2021, accessed on January 4, 2022, at (<https://msc.fema.gov/portal/home>), the proposed project is located partially in Zone X and partially in Zone AE. An X zone is defined as an area of minimal flooding, yielding no floodplain concerns, being outside the SFHA. An AE zone is an area having special flood, mudflow or flood-related erosion hazards and shown on a FIRM (Figure #3). 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 McCloud Plantation 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 2). 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 a result of no federal actions.

#### ***Alternative 2 - Develop the McCloud Plantation Group Site with MHUs (Proposed Action)***

The Proposed Action Alternative would involve construction in a designated coastal zone. The Office of Coastal Management (OCM) determined in a letter dated September 28, 2012, that all Federal financial assistance (emergency or not) is fully consistent with the Louisiana Coastal Resources Program. FEMA submitted a Consistency Determination letter to the OCM dated September 29, 2021, that indicated project(s) in the following Individual Assistance (IA) designated parishes: Jefferson, Lafourche, Livingston, Plaquemines, St. Charles, St. Helena, St. James, St. John the Baptist, Tangipahoa, and Terrebonne Parish will not affect any coastal uses or resources in accordance with 15 CFR 930.36. In a OCM response letter dated September 29, 2021 (Consistency number C20210142), the OCM concurred with FEMA’s negative determination, as described by National Oceanic and Atmospheric Administration (NOAA) regulations on federal consistency at 15 CFR §930 (see Attachment 4).

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

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

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

**Table 1: Federally Listed Species Known to Occur in Lafourche Parish**

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

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

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

***Alternative 2 - Develop the McCloud Plantation Group Site with MHUs (Proposed Action)***

There is one Federally listed species, the West Indian Manatee, with the potential to occur in Lafourche Parish, Louisiana (see Table 1); however, this species does not have the potential to occur within the McCloud Plantation Group Site project area. Per USFWS Information for Planning and Consultation (IPaC) website, there are no critical habitat for this species within the project area.

Inspection of the proposed site did not indicate the presence of any species federally listed as threatened or endangered. The USFWS’s IPaC website (<https://ecos.fws.gov/ipac/>), accessed on January 12, 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 January 14, 2022 resulted in a finding of no designated critical habitats in the project area. The following webpages were reviewed for critical habitats in the project area:

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

Based on the scope of work and lack of suitable habitat at the project site, FEMA has made the determination that the Proposed Action Alternative would have no effect on federally listed species listed as threatened or endangered and would have no effect on critical 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. In addition, providing Direct Temporary Housing Assistance in the form of constructing TTHU Group Sites meets the definition of a Federal Undertaking pursuant to Title 36 Code of Federal Regulations Part 800. Accordingly, FEMA is required to comply with Section 106 of the National Historic Preservation Act (NHPA).

FEMA is initiating Section 106 review for the Undertaking in accordance with the Programmatic Agreement between FEMA, the Louisiana State Historic Preservation Officer (SHPO), the Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP), and Participating Tribes, executed on December 21, 2016, as amended (Agreement). Due to the emergency need to find safe housing locations for the many survivors, FEMA is consulting per 36 CFR § 800.12(d) and Stipulation II.B.2 of the Agreement regarding Expedited Review for Emergency Undertakings.

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

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

### ***Alternative 2 - Develop the McCloud Plantation Group Site with MHUs (Proposed Action)***

FEMA has determined that the Area of Potential Effects (APE) for the proposed Undertaking to include the footprint of the 69-acre group site for direct effects related to the proposed work and proposes the entire 171-acre parcel as the viewshed APE around the perimeter of the proposed group site.

During the week of February 8, 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 to identify the presence of historic properties within the APE.

No archaeological sites have been recorded within the APE or within a one-mile radius of the project area. The nearest archaeological site is located over four miles from the project area.

FEMA has determined that there are eleven (11) historic properties as defined in 36 CFR 800.16(1) within the APE. Due to the temporary nature and intermittent use of the proposed group housing, the historic properties within the APE would not be adversely affected by the proposed Undertaking. FEMA has determined a finding of No Adverse Effect to Historic Properties in accordance with Stipulation II.C.4 of the 2016 Statewide PA. FEMA conditions its approval of the group site on the following:

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

On February 16, 2022, a letter was sent to the SHPO for Section 106 consultation regarding the Undertaking (see Attachment 1). The same consultation letter was also sent to Participating Tribal Nations. SHPO concurrence was received February 17, 2022. The Five (5) Tribal Nations

(Coushatta Tribe of LA, Eastern Shawnee of Oklahoma, Jena Band of Choctaw Indians, Mississippi Band of Choctaw, and the Tunica-Biloxi Tribe of LA) did not provide a response during the 7-day comment period. As such, FEMA may proceed with the Undertaking.

## **5.6 Socioeconomic Resources**

The project site is located in Lafourche Parish, Louisiana. According to the United States Census Bureau (USCB), the population as of April, 2020, was 97,557 with a total of 36,895 households. The median household income was estimated at approximately \$55,506 (in 2019 dollars). According to the 2019 USCB Estimates, approximately 14.5% of population lives below poverty levels.

The population within Lafourche Parish, Louisiana, is comprised of about 80.5% Caucasian, 13.5% African American, 0.9% Asian, 4.4% Hispanic, 3.0% American Indian and Alaska Native alone, 0.1% Native Hawaiian and Other Pacific Islander alone, and 2.0% Two or More Races. The demographic makeup of the group site residents is expected to be similar to the community as a whole (Table 2).

**Table 2: Project Population Data<sup>1</sup>**

<b>Area</b>	<b>Population<sup>2</sup></b>	<b>White (Caucasian) Alone</b>	<b>Black or African American Alone</b>	<b>Asian Alone</b>	<b>Hispanic or Latino</b>	<b>American Indian and Alaska Native Alone</b>	<b>Native Hawaiian and Other Pacific Islander Alone</b>	<b>Two or More Races</b>	<b>Poverty Rate<sup>3</sup></b>	<b>Households</b>	<b>Median Household Income<sup>4</sup></b>
Lafourche Parish	97,557	80.5%	13.5%	0.9%	4.4%	3.0%	0.1%	2.0%	14.5%	36,895	\$55,506
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

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<sup>1</sup> 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

<sup>2</sup> USCB ACS, Vintage 2020 Population Estimates, July 1, 2021

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

<sup>4</sup> 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 McCloud Plantation 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 291 manufactured housing unit pads and all necessary support facilities. The potential site residents would be from areas within the parish which have been impacted by the flooding. The local community is aware of this action and may experience a slight localized increase in the need for public services, such as schools, fire and police services, childcare, and medical services. However, the overall demand for public and commercial services is not expected to be greater than the pre-disaster demand and potential impacts are expected to be minimal.

### **5.7 Hazardous Materials**

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

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

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

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

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

### ***Alternative 2 - Develop the McCloud Plantation Group-Housing Sites with MHUs (Proposed Action)***

From a review of the records, including the EDR Radius Report dated January 5, 2022, it is not likely that there is a presence of any hazardous substances or petroleum products at the McCloud Plantation Group Site, nor is there any evidence of past or existing releases or any material threat of release of hazardous substances or petroleum products into the ground, ground water or structures within one mile of the group site property.

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

## **5.8 Traffic and Transportation**

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

The project area is adjacent to LA-308. LA-308 connects to Highway 1 to the east near the community of Larose and to Interstate 90 (I-90) to the northwest near the City of Houma. Highway 1 and I-90 are major arteries through southern Louisiana.



### *Alternative 1- No Action Alternative*

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

### *Alternative 2 - Develop the McCloud Plantation 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. A Public Notice for public comments and review for the Draft EA has been posted on the websites of GOHSEP, Lafourche Parish, and Lafourche Parish Public Library, and a bulletin has been posted at Lockport Town Hall. This Draft EA is available at the following website <https://www.fema.gov/emergency-managers/practitioners/environmental-historic/region/6>.

The public comment period will be limited to three (3) days from March 4, 2022 through March 6, 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](mailto:dr-4611-fema-ehp-ia@fema.dhs.gov). When responding by email, please reference the project name, “**Temporary Housing – McCloud Plantation Group Housing Site (LF-4)**” in the subject field. If no substantive comments are received, the Draft EA and FONSI will become final and no further public noticing will be conducted.

## 7.0 MITIGATION

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

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

- Any change to the approved scope of work will require re-evaluation for compliance with NEPA and other Laws and Executive Orders.
- This review does not address all federal, state, and local requirements. Acceptance of federal funding requires recipient 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.
- 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.
- Compliance with State Regulations: Placement of MHUs or other readily fabricated dwellings must be in accordance and in compliance with Louisiana regulations.
- Local Permitting and Codes: Any FEMA units will be installed in compliance with applicable local codes, ordinances and permitting requirements. Any contracted logistics installation entities (installers) for TTHU placement will secure all pertinent Federal, state, and local permits and approvals before work.
- Health and Safety: Before unit occupancy, the responsible program, will provide applicants with a Health and Safety Advisory regarding the flood hazard, local emergency evacuation plans, right-of-entry during an emergency, and possible unit haul off.
- The responsible program will ensure the local emergency manager has information regarding location of TTHU occupants and potential special needs, to integrate into local emergency plans.
- Appropriate BMPs will be implemented during site development to minimize sediment migration from the site into nearby water bodies. Surface runoff will be controlled by using siltation controls such as silt fencing around the construction site to minimize erosion of materials into adjacent wetlands and/or waterways. Any disturbed soil will be protected with seed or sod after construction in order to decrease the amount of soil eroded by rainfall and runoff. Any fill stored on site will be appropriately covered to prevent erosion.

- The Contractor shall comply with all requirements for a point source discharge to waters of the State. A Louisiana Pollutant Discharge Elimination System (LPDES) permit may be required in accordance with the Section 401 and 402 of the Clean Water Act (CWA) and the Louisiana Clean Water Code.
- 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.
- 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.
- Unusable equipment, debris and material will be removed or 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.
- Construction activities with elevated noise levels will be limited from 7:00 A.M. to 7:00 P.M, unless otherwise approved by the Parish. Equipment and machinery used during construction will meet all local, State, and Federal noise regulations.
- The LDOTD and Parish will be coordinated with in the planning and construction of this group site, to establish appropriate traffic safety measures and management protocols for the area.
- The appropriate signage must be posted, and fencing installed to minimize potential adverse public safety concerns. Appropriate signage and barriers will be in place prior to construction activities in order to alert pedestrians and motorists of project activities and traffic pattern changes.
- Once the temporary housing need has ended, FEMA expects that all 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.
- MHUs shall comply with 24 CFR Part 3280 Manufactured Home Construction and Safety Standards (“Department of Housing and Urban Development [HUD] code”).
- Work will comply with all conditions of U. S. Army Corps of Engineers Nationwide Permits, if required.

## 8.0 LIST OF PREPARERS

EA Preparer(s):

- Alice Murphy, Environmental Protection Specialist, FEMA
- Victoria Luksha, Historic Preservation Specialist, FEMA
- Nicholas Moore, Historic Preservation Specialist, FEMA

Field Team:

- Adam Gaskin, USACE Group Site SME

Reviewers:

- Charles Barrowclough, Environmental Protection Specialist, FEMA
- Byron Flournoy, Environmental Protection Specialist, FEMA

Deputy Housing EHP Advisor (EHAD):

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

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

Resource Area	Alternative 1- No Action Alternative	Alternative 2 - Proposed Action: Develop the Group Site with MHUs	Mitigation	Agency Coordination/ Permits
Soils	No change from current conditions.	The canicienne silt loam soil at the McCloud Plantation site is considered prime farmland. FEMA’s rating resulted in a total of 42 out of 160. In accordance with 7 CFR 658.4(c)(2), “sites receiving a total score of less than 160 (combined FEMA score total and NRCS score total) need not be given further consideration for protection and no additional sites need to be evaluated.”	No mitigation required	No agency coordination

Resource Area	Alternative 1- No Action Alternative	Alternative 2 - Proposed Action: Develop the Group Site with MHUs	Mitigation	Agency Coordination/ Permits
Water Quality	No change from current conditions.	There is potential for localized increase in sedimentation as a result of site preparation activities. Potential impact to water quality in downstream swales, ditches, and streams (e.g., turbidity, siltation, biological oxygen demand).	Appropriate BMPs will be implemented during site development to minimize sediment migration from the site into nearby water bodies. Surface runoff will be controlled by using siltation controls such as silt fencing around the construction site to minimize erosion of materials into adjacent wetlands and/or waterways. Any disturbed soil will be protected with seed or sod after construction in order to decrease the amount of soil eroded by rainfall and runoff. Any fill stored on site will be appropriately covered to prevent erosion. If the project results in a discharge to waters of the State, a Louisiana Pollution Elimination System (LPDES) permit may be required in accordance with the Section 401 of the CWA and the Louisiana Clean Water Code.	LDEQ may require a LPDES permit in accordance with the Sections 401 and 402 of the CWA and the Louisiana Clean Water Code.
Wetlands	No change from current conditions.	Non-delineated wetland areas on site will be avoided and therefore there will be no impacts to wetlands.	No MHUs will be installed where wetlands occur.	USACE

<b>Resource Area</b>	<b>Alternative 1- No Action Alternative</b>	<b>Alternative 2 - Proposed Action: Develop the Group Site with MHUs</b>	<b>Mitigation</b>	<b>Agency Coordination/ Permits</b>
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.	No agency coordination
Coastal Zone Management	No change from current conditions.	MHU's would be installed in a designed 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

Resource Area	Alternative 1- No Action Alternative	Alternative 2 - Proposed Action: Develop the Group Site with MHUs	Mitigation	Agency Coordination/ Permits
Cultural Resources	No change from current conditions.	Due to the emergency need to find safe housing locations for the many survivors, FEMA will follow Stipulation II.B.2 of the Agreement regarding Expedited Review for Emergency Undertakings. FEMA has determined that there would be no historical properties affected as a result of the Proposed Action. The SHPO concurred with this determination on February 17, 2022.	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.	FEMA has consulted with SHPO and obtained concurrence on February 17, 2022. Five (5) Tribal Nations (CT, ESTO, JBCI, MBCI, TBTL) were provided an opportunity to comment on the Section 106 review, and did not provide a response during the 7-day notice period.
Environmental Justice	No change from current conditions.	The Proposed Action would not pose disproportionately high and adverse public health or environmental effects on minority and low-income populations.	No mitigation required	No agency coordination
Hazardous Materials	No change from current conditions.	Under the Proposed Action, there are no anticipated impacts from hazardous materials and hazardous substances.	Unusable equipment, debris and material will be disposed of prior to occupancy in an approved manner and location. In the event significant items (or evidence thereof) are discovered during implementation of the project, petroleum products, hazardous materials, and toxic waste will be handled, managed, and disposed of in accordance to the requirements and to the satisfaction of the governing local, state, and federal agencies.	No agency coordination

Resource Area	Alternative 1- No Action Alternative	Alternative 2 - Proposed Action: Develop the Group Site with MHUs	Mitigation	Agency Coordination/ Permits
Traffic and Transportation	No change from current conditions.	Under the Proposed Action, a temporary increase in construction-related traffic during the group site construction. Once the Proposed Action has been completed, traffic would be expected to return to normal.	The appropriate signage must be posted, and fencing installed to minimize potential adverse public safety concerns. The LDOTD and Parish will be coordinated with in the planning and construction of this group site, to establish appropriate traffic safety measures and management protocols for the area.	LDOTD



# Figures



**Figure 1: Aerial Photo Depicting Riverine and Vicinity of Proposed McCloud Plantation Group Site**



**Figure 2: McCloud Plantation Group Site Proposed Layout**



Figure 3: McCloud Plantation Flood Insurance Rate Map



**Figure 4: Photograph of Existing Site Conditions at the Proposed McCloud Plantation Group Site Facing Southwest**

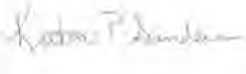


**Figure 5: Photograph of Existing Site Conditions at the Proposed McCloud Plantation Group Site Facing East**

# Attachments

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

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

  
Kristin P. Sanders Deputy  
State Historic Preservation Officer

Date



**FEMA**

**February 16, 2022**

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

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

Temporary Housing Group Site – McCloud Plantation (GPS Coordinates: NE Corner 29.651813, -90.522364) Lafourche Parish, Louisiana

Determination: No Adverse Effect to Historic Properties

Dear Ms. Sanders:

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

FEMA is initiating Section 106 review for the above referenced Undertaking in accordance with the Programmatic Agreement among FEMA, the Louisiana State Historic Preservation Officer (SHPO), the Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP), and Participating Tribes, executed on December 21, 2016, as amended (2020 Statewide PA).

Due to the emergency need to find safe housing locations for the many survivors, FEMA is consulting per 36 CFR § 800.12(d) and Stipulation II.B.2 of the 2016 Statewide PA regarding Expedited Review for Emergency Undertakings, with the 5<sup>th</sup> extension period for Expedited Review running through February 24, 2022.

As a result of the damage caused by Hurricane Ida, approximately 9,248 survivors will require temporary housing assistance, with 2,209 survivors within Lafourche Parish. FEMA anticipates needing to provide approximately 1198 housing solutions in Lafourche Parish through the placement of Transportable Temporary Housing Units (TTHU) and Uniform Federal Accessibility Standard (UFAS) housing units within multiple group sites.

FEMA is initiating consultation for (1) potential group site within Lafourche Parish with this consultation letter. The McCloud Plantation Site is located east of Highway 308 on parcel # 0092636300, with the northern corner GPS Coordinate: 29.651813, -90.522364 (Figure 1). The approximate number of TTHUs, parcel size in acres, and GPS coordinates of the boundary corners for the proposed group site are included in Table 1.

The Undertaking will require grading and leveling for the installation of roads and individual gravel site pads to support approximately 255 TTHUs, 49 UFASs, and one office at the McCloud Plantation Property (a full set of proposed plans will be included as a supplemental attachment). Excavation for the installation of subsurface water, sanitation, and electric utilities will be required for each individual TTHU or UFAS. And will extend as required to connect to existing utility tie-ins at Highway or adjacent to the new development along Fossa Circle. Access roads for ingress and egress to and from the site and circulation roads to allow access to each individual unit would be constructed. Gravel pads for parking and trash, concrete parking pads for ADA compliant units, site lighting, and a perimeter privacy fence will also be constructed. A geotextile fabric will be installed after minor grading to remove existing vegetation, and a gravel road base will be installed throughout the site. Figure 2 shows the proposed site plan for the TTHUs as developed by the U.S. Army Corps of Engineers (USACE).

Equipment staging will be limited to the group site boundary and would not extend to any area adjacent to the proposed group site unless it is hard-paved. Debris generated during construction will be removed to an existing licensed landfill. Any fill needed during construction will be obtained from an existing commercial borrow source. The exact depth of excavation and grading at the group sites is unknown but will not exceed a maximum of 3.5 ft (1.07 m), with an increase to 2.1 to 2.4 m (7-8 ft) as they approach inner project area tie ins, with pump wells in two (2) locations being 4-6 ft (1.2 to 1.8 m) in diameter and going no deeper than 10 ft (3 m).

This depth of ground disturbance needed will be the least extent necessary to facilitate construction and to comply with building code requirements. The utilities will extend as required to connect to existing utility tie-ins on the eastern side of the project area located off of McCloud Road. The TTHUs will likely be removed once more permanent housing solutions are found for displaced individuals and families. However, site improvements such as underground utilities, gravel and concrete pads, the perimeter fence, circulation roads may remain.

**Table 1: Proposed Group Site**

Site Name	Number of Figures	City	Parish	Parcel #	Parcel (Acres)	No. TTHUs	Coordinates
McCloud Plantation	1 - 8	Lockport	Lafourche	0092636300	171.4 Project Area 69	255; 49 UFAS	29.651813, -90.522364 29.649483, -90.526259 29.648336, -90.523120 29.645180, -90.521066 29.647685, -90.516174 29.647952, -90.518299

FEMA has proposed the Area of Potential Effects (APE) for this Undertaking to include the

footprint of the group site for direct effects related to the proposed work and proposes the entire 171-acre parcel as the viewshed APE around the perimeter of the proposed group site as depicted in Figure 3. The footprint of the group site for direct effects includes areas of ground disturbance within the proposed group site boundary inclusive of access roads, a recreational area, a sewage treatment structure, and utilities installation. The proposed group site location is active sugarcane farmland that has been in continuous cultivation for over 50 years. In accordance with Stipulation II.C(2)(b) of the 2016 Statewide PA, FEMA is requesting your concurrence with the proposed APE.

During the week of February 8, 2022, FEMA Historic Preservation Specialists consulted the Louisiana Office of Cultural Development's Cultural Resources National Register database, the Louisiana Cultural Resources Map and associated site files (LDOA website), the US Department of Agriculture Web Soil Survey maps (USDA Website), various digital archival resources, photos, and historic maps to identify the presence of historic properties within the APE.

Soils within the project area consist entirely of Cancienne silty loam and Cancienne silty clay loam. Both soils are indicative of natural levees and are somewhat poorly drained (USDA Website). Maps and aerial imagery indicate the area has been utilized for agricultural cultivation for decades. Based on the combination of available natural resources, poorly drained soils, and repetitive agricultural disturbance within the plow zone, the area within the proposed group site boundary has a moderate to low potential for the presence of intact archaeological deposits.

Background research efforts identified thirteen (13) previously recorded historic standing structures, one modern structure, and one (1) archaeological Assessment and Reconnaissance survey in the APE. Figure 4 shows the locations of the previously recorded standing structures. No archaeological sites have been recorded within the APE. None of the identified standing structures are individually listed on the National Register of Historic Places (NRHP), nor are they currently located within a National Register Historic District or adjacent to any properties that have been listed or previously determined to be eligible for listing on the NRHP.

No archaeological sites have been recorded within the APE. No archaeological sites have been recorded within a one-mile radius of the project area and the nearest archaeological site is located over four miles from the project area and shown in Figure 5.

Historic maps depict an old, unnamed road on the north side of McCloud Road within the APE. The road first appears on the 1892 Houma quad map but is no longer shown on the 1935 and later maps (Figure 6). A non-extant structure is shown at the northwest intersection of the unnamed road and Highway 308. The road crossed into the current project area, but the house would have been located outside the area of disturbance and any associated resources may have been disturbed during construction of the Career Magnet Center.

A Phase I archaeological survey was undertaken adjacent to the APE, on the south side of Highway 308 by Chouest and Shuman in 2015 (Figure 7). That survey covered an area of 5 acres (2.02 ha) and consisted of an open lot intended to be used for recreational purposes. A total of 43 transects were excavated and no cultural resources or archaeological sites were documented as part of the survey. East of the Phase I survey there was a previously recorded structure (29-01503). The LHRI



incorrectly described the structure as a 1938 double shotgun house associated with the oil and gas industry. The structure appears to no longer exist and was suffering from deferred maintenance when surveyed, likely in the 1990s.

Thirteen (13) previously recorded historic structures have been identified in the APE. Additionally, one (1) modern development with two (2) structures connected by an awning are also within the APE: the Career Magnet Center, constructed in approximately 2012, is adjacent to the west side of the proposed project area and in the central-west section of the APE (see Figure 3). Thirteen structures have been recorded southeast of the project area along McCloud Road. None of these structures has been previously evaluated for inclusion in the NRHP. Eleven (11) of the thirteen (13) structures are still extant (29-01559, 29-01560, 29-01562, 29-01563, 29-01564, 29-01565, 29-01566, 29-01567, 29-01568, 29-01569, and 29-01570) and are listed in Table 2. Figure 8 Shows the LHRI Standing Structures Survey and building locations. Structures 29-01558 and 29-01561, located at 163 McCloud and 202 McCloud respectively, were previously recorded but have been razed.

The Louisiana and Delta Railroad (LDRR) is situated along the eastern boundary of the project area and the lines for the rail were constructed between 1880 and 1890. The rail line was originally a part of the Southern Pacific railway. LDRR still exists today and operates approximately 114 miles of branch line in southern Louisiana between the towns of Lafayette and Raceland, with most of the lines located near US Highway 90. LDRR generally transports bauxite ore, carbon black, fertilizer, molasses, oilfield supplies, paper products, pipe, sugar, and rice. The portion of the rail line adjacent to the proposed project area is not currently in use and it appears to have ceased operations around 2012. The rail line has not been recorded or evaluated for inclusion in the NRHP. However, there is a medium size drainage ditch separating the rail line and the project area, so the proposed Undertaking would not alter or effect the abandoned rail line.

The McCloud Plantation Group Site is not located adjacent to any historic districts that are listed in or that have been previously determined eligible for listing in the National Register of Historic Places, nor are there any recorded, eligible, or potentially eligible archaeological sites in the proposed project area. Although there is potential for artifacts associated with occupation along McCloud Road to be present in the APE, the current site plan provided by USACE has incorporated a 300 ft buffer between the TTHU housing and the properties along McCloud Road to avoid affecting this area as it has the highest potential for historic properties.

For the purposes of Section 106 and this Undertaking, FEMA is treating the eleven (11) historic structures within the APE as eligible for listing in the NRHP under Criterion A as contributing elements of the McCloud Plantation NRHP Eligible Historic District. Two other previously recorded standing structures were located inside the APE on McCloud Road but have been demolished. According to historic aerial imagery, building 29-01558 was demolished sometime between 2013 and 2014 and building 29-01561 was demolished several years earlier sometime between 1998 and 2004. Updated LHRI survey forms will be submitted as part of this Section 106 consultation utilizing the existing resource identification numbers.

**Table 2: Recorded Standing Structures**

Structure #	Address	Type	Year Built	Style
29-01559	173 McCloud Rd	Shotgun	1925	No Style
29-01560	170 McCloud Rd	Shotgun	1925	No Style
29-01562	192 McCloud Rd	Bungalow	1952	No Style
29-01563	213 McCloud Rd	Bungalow	1954	No Style
29-01564	225 McCloud Rd	Bungalow	1954	No Style
29-01565	234 McCloud Rd	Bungalow L	1925	No Style
29-01566	220 McCloud Rd	Bungalow	1954	No Style
29-01567	210 McCloud Rd	Bungalow	1954	No Style
29-01568	200 McCloud Rd	Bungalow	1954	No Style
29-01569	188 McCloud Rd	Bungalow	1954	No Style
29-01570	178 McCloud Rd	Shotgun	1925	No Style

FEMA has determined that there are eleven (11) historic properties as defined in 36 CFR 800.16(l) within the APE. Due to the temporary nature and intermittent use of the proposed group housing, the historic properties within the APE would not be adversely affected by the proposed Undertaking. Additionally, the group housing site is proposed towards the rear of the parcel which is approximately 1,500 feet from Bayou Lafourche and therefore has a much lower potential for encountering archaeological resources. Therefore, FEMA has determined a finding of **No Adverse Affect to Historic Properties** in accordance with Stipulation II.C.4 of the 2016 Statewide PA. FEMA will condition its approval of the group site on the following:

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

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

Sincerely,

Jeramé J. Cramer  
EHP Advisor  
Region 6  
FEMA-State Joint Field Office  
FEMA-4559-DR-LA  
1500 Main St  
Baton Rouge, LA 70802

Attachments:

McCloud Plantation Group Site Plans



**February 16, 2022**

**RE: Section 106 Review Consultation, Expedited Review, Hurricane Ida, FEMA-4611-DR-LA**  
Temporary Housing Group Site – McCloud Plantation (GPS Coordinates: NE Corner 29.651813,  
-90.522364) Lafourche Parish, Louisiana

Determination: No Adverse Effect to Historic Properties

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

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

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As a result of the damage caused by Hurricane Ida, approximately 9,248 survivors will require temporary housing assistance, with 2,209 survivors within Lafourche Parish. FEMA anticipates needing to provide approximately 1198 housing solutions in Lafourche Parish through the placement of Transportable Temporary Housing Units (TTHU) and Uniform Federal Accessibility Standard (UFAS) housing units within multiple group sites.

FEMA is initiating consultation for (1) potential group site within Lafourche Parish with this consultation letter. The McCloud Plantation Site is located east of Highway 308 on parcel # 0092636300, with the northern corner GPS Coordinate: 29.651813, -90.522364 (Figure 1). The

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

**APPLICANT:** McCloud Plantation Group Site  
**PARISH/STATE:** Lafourche, LA  
**COORDINATES:** Latitude: 29.651813, Longitude: -90.522364  
**PROPOSED ACTION:** Provide MHU Housing at McCloud Plantation Group Site  
The Proposed Action would utilize the project site and design to contract for the construction of approximately 291 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).**

Portions of the project are located within an "AE" zone, area of 100-yr flooding, per Flood Insurance Rate Map (FIRM) panel 22057C0370E, dated 6/16/2021.

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**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: \_\_\_\_\_

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**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 Lafourche 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 January 11, 2022, based on applicant call outs, it is estimated that approximately 1,198 households will require direct temporary housing assistance in Lafourche Parish. While approximately half of this need has been met with private and commercial sites, there remains a balance of 559 unit needs which could be filled through group site locations.

Currently, there are 37 group site locations in Lafourche Parish that have undergone a review. It has been determined that 28 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 9 sites which are located in the SFHA.

For the McCloud Plantation Group Site, the proposed project would satisfy 291 MHUs of the 559 needed units. It has been determined that there is no practicable alternative to the development of McCloud site.

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**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?  
Comment: See step 5 for more details
- 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 69 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.

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**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 into an existing drainage ditch where the water will flow into Bayou Lafourche. 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.**

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**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 Lafourche parish, GOHSEP, webpages and FEMA.gov.

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**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

CEMVN-RG-J

15 December 2021

MEMORANDUM FOR Christopher Klein, SAD

SUBJECT: Hurricane Ida Temporary Housing Hugh Caffery McCloud Plantation site (MVN-2021-01293-SB)

1. Reference is made to your request for a determination of regulatory permitting requirements to place temporary housing called the Hugh Caffery McCloud Plantation site on property located in Section 1, Township 16 South, Range 19 East, Terrebonne Parish, Louisiana (enclosed map).
2. Based on review of recent maps, aerial photography, and soils data, we have determined that part of the property contains non-wetland waters that are subject to Corps' jurisdiction. The approximate limits of the non-wetland waters are designated in blue on the map. A Department of the Army (DA) permit under Section 404 of the Clean Water Act will be required prior to the deposition or redistribution of dredged or fill material into these waters of the U.S. Additionally, part of the property contains uplands that are not subject to Corps' jurisdiction. The approximate limits of the uplands are designated in green on the map. A DA permit will not be required for activities in the upland areas.
3. Please be advised that this determination only applies to DA permitting requirements and does not alleviate your responsibility to obtain proper authorization from other federal, state, or local agencies that may be required.
4. Please be advised that this property is in the Louisiana Coastal Zone and a Coastal Use Permit may be required prior to initiation of any activities on this site. For additional information, contact Ms. Christine Charrier, Office of Coastal Management, Louisiana Department of Natural Resources at (225) 342-7953.

**Brad**  
**Guarisco**  
BRAD GUARISCO  
Chief, Jurisdiction and Enforcement Branch  
Regulatory Division

Digitally signed by  
Brad Guarisco  
Date: 2021.12.15  
12:42:40 -06'00'

Encl



**USACE** IH 12/15/2021  
**By:** BRAD GUARISCO  
**For:** KLEIN  
 (MVN-2021-01293-SB)

- = DETERMINATION BOUNDARY
- = NON-WETLAND WATERS OF THE U.S.
- = NON-WETLAND

# DELINEATION ONLY

Google Earth  
 Imagery Date: 3/20/2019 lat 29.647308° lon -90.522443° elev 0 ft eye alt 6069 ft



**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