



**FEMA**

May 9, 2008

Mr. Kenneth Carleton  
MS Tribal Historic Preservation Office

RE: Consultation request for proposed Programmatic Environmental Assessment for  
the Placement of Permanent Disaster Relief Residential Housing

Dear Mr. Carleton:

Recognizing the extensive and complex housing challenges facing victims and communities as a result of Hurricane Katrina and acknowledging the limitations on Federal Emergency Management Agency's (FEMA) ordinary statutory authority to provide non-temporary housing solutions, Congress appropriated funds to the Department of Homeland Security to support alternative housing pilot programs (Emergency Supplemental Appropriations Act, 2006, P.L. 109-234). The Alternative Housing Pilot Program (AHPP) represents a one-time exception to FEMA's existing authority under the Stafford Act, which legally binds FEMA to a temporary housing mission reliant primarily on travel trailers and manufactured homes, by providing an opportunity to explore, implement, and evaluate innovative approaches to housing solutions, and to address ongoing housing challenges created by the 2005 hurricane season in the states of the Gulf Coast region, including the State of Mississippi.

The Mississippi Emergency Management Agency (MEMA) applied for FEMA funding under the AHPP to provide both temporary and permanent housing solutions for eligible families displaced from Katrina. Since the inception of AHPP in Mississippi, MEMA provided for approximately 2,000 temporary Mississippi Cottages. MEMA proposes to provide permanent housing within George, Hancock, Harrison, Jackson, Pearl River and Stone Counties.

The National Environmental Policy Act of 1969 (NEPA) and its implementing regulations 40 C.F.R. Part 1500 and 44 C.F.R. Part 10 direct FEMA to take into consideration the environmental consequences of proposed actions during the decision-making process. FEMA must comply with NEPA before making federal funds available for all FEMA programs.

FEMA determined that the recurring proposed actions that require an Environmental Assessment (EA) can be grouped by the nature and location of the proposed actions. These actions can be evaluated through a Programmatic Environmental Assessment (PEA) for compliance with NEPA and its implementing regulations without developing

an EA for every action. FEMA determined that a PEA can be prepared to analyze the potential environmental impacts of MEMA's proposed permanent housing phase within the six above mentioned counties. Gulf South Research Corporation (GSRC) has been retained by FEMA to prepare a PEA for the AHPP permanent installation projects.

FEMA will use this PEA to determine the level of environmental documentation required under NEPA for any proposed permanent housing action in Mississippi, given the available site-specific information. If the alternatives, levels of analysis, and site-specific information of an action proposed for FEMA funding are fully and accurately described in this PEA, FEMA will prepare a memorandum documenting this determination. This memorandum would state that FEMA has reviewed the proposed action, alternatives, and potential direct, indirect and cumulative impacts and found them to be accurately described by this PEA and its associated Finding of No Significant Impact (FONSI). Should FEMA determine that an action has the potential to affect a resource, a tiered Supplemental Environmental Assessment (SEA) would be prepared. Should an action fall outside the scenarios illustrated below, FEMA would prepare an EA for that proposed action.

At this time, FEMA requests that your agency review the five scenarios presented below. Please provide comments and any available information under your agency's jurisdiction to aid in the preparation and expedited approval of this PEA. Any concerns raised will be addressed in the PEA, and formal consultation will allow for your review of the final document.

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Existing, temporary Mississippi Cottages will be made permanent by replacing temporary foundations at the same location and footprint and replacing existing, above-ground utilities with buried utilities. Over 1000 of the existing temporary units fall within the Coastal High Hazard Area (CHHA) (Flood zone V). No permanent housing will be allowed in a V-zone. The lessees have the option of finding a new location outside of this CHHA for placement of a permanent unit. These sites would then fall under Scenario 2 or 3.

As these cottages were reviewed for NEPA compliance during initial installation, FEMA does not anticipate the need to consult with applicable agencies (i.e., USACE, USFWS, SHPO, THPO, etc.) as long as FEMA has identified that there are no resources under their jurisdiction present on the project site or within such vicinity that the action has potential to affect that resource. Should a consultation agency wish, FEMA would prepare a document of determination supporting its conclusion for submittal to the agency.

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Please provide FEMA with a point of contact within your agency so that we may address any concerns or comments you may have relating to any of the proposed scenarios. We would appreciate receiving your concerns/comments as soon as possible. If we have not

Kenneth Carleton

May 9, 2008

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Sincerely,

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Michael Grisham  
Environmental Liaison Officer  
FEMA-1604-DR-MS  
TRO- Biloxi, MS

August 19, 2008



Keith Carleton  
Mississippi Tribal Historic Preservation Office  
Sent via E-mail: KCarleton@choctaw.org

RE: Draft Programmatic Environmental Assessment for the Placement of Permanent  
Disaster Relief Residential Housing

Dear Mr. Carleton:

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potential to affect a specific resource; a tiered Supplemental Environmental Assessment (SEA) would be prepared. Additionally, should an action fall outside the scenarios illustrated in the PEA, FEMA would prepare an EA for that proposed action.

At this time, FEMA requests that your agency review the draft PEA and provide any comments to FEMA by September 1, 2008, via the contact information below. Any concerns or comments raised will be addressed in the PEA. Please send all comments to Michael Grisham via fax (228) 385-7884 or email at [pea-comments@dhs.gov](mailto:pea-comments@dhs.gov).

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Michael Grisham  
FEMA Environmental Liaison Officer  
FEMA/State Transitional Recovery Officer  
220 Popps Ferry Road, Building A South  
Biloxi, MS 39531



**FEMA**

May 9, 2008

Mr. Andy Prosser  
MS Dept of Agriculture & Commerce  
P.O. Box 1609  
Jackson, MS 39215

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Sincerely,



Michael Grisham  
Environmental Liaison Officer  
FEMA-1604-DR-MS  
TRO- Biloxi, MS

August 19, 2008



Andy Prosser  
Mississippi Department of Agriculture and Commerce  
121 North Jefferson Street  
Jackson, MS 39201

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FEMA/State Transitional Recovery Officer  
220 Popps Ferry Road, Building A South  
Biloxi, MS 39531



**FEMA**

May 9, 2008

Mr. Claiborne Barnwell  
MS DOT, Environmental Division  
Administration Bldg  
P.O. Box 1850  
Jackson, MS 39215-1850

RE: Consultation request for proposed Programmatic Environmental Assessment for the Placement of Permanent Disaster Relief Residential Housing

Dear Mr. Barnwell:

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Claiborne Barnwell  
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Michael Grisham  
Environmental Liaison Officer  
FEMA-1604-DR-MS  
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August 19, 2008



Claiborne Barnwell  
Mississippi Department of Transportation  
Environmental Division  
401 North West Street  
Jackson, MS 39201

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Biloxi, MS 39531



**FEMA**

May 9, 2008

Mr. Homer L. Wilkes  
USDA, Natural Resources Conservation Services  
100 W. Capitol Street  
Suite 1321 Federal Bldg  
Jackson, MS 39269

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Mr. Homer L. Wilkes:

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agency wish, FEMA would prepare a document of determination supporting its conclusion for submittal to the agency.

Scenario 2: Permanent Installation of Pre-Fabricated Dwellings on Previously Developed Land.

This scenario would place Mississippi Cottages on permanent foundations with in-ground utilities. Cottages would be elevated to the Advisory Base Flood Elevation (ABFE) or other approved local floodplain ordinance. Projects under this scenario may require ground disturbing activities including the demolition of the former housing structure, slab/foundation removal and the refurbishment of existing utilities (i.e. utility lines, septic systems, water wells, etc.)

Scenario 3: Permanent Installation of Pre-Fabricated Dwellings on Undeveloped Land

This scenario would place Mississippi Cottages on permanent foundations with in-ground utilities. This scenario may involve placement of an individual unit onto a single vacant lot or moving an existing Cottage within the same property. Cottages would be elevated to the Advisory Base Flood Elevation (ABFE) or other approved local floodplain ordinance. Projects under this scenario may require ground disturbing activities including installation of utilities (i.e. utility lines, septic systems, water wells, etc.) and entryways (driveways, sidewalks, etc.)

Scenario 4: Permanent Group Housing Installation of Pre-Fabricated Dwellings in Pre-Existing Group/Commercial Sites

This scenario would create permanent group housing sites on pre-existing or vacant group, residential, and commercial housing sites. This would include the use of vacant mobile home communities and former FEMA temporary trailer sites. These sites would require full development of infrastructure (i.e. roads, utilities, etc.), creating housing sites equivalent to a residential housing subdivision. Cottages would be elevated to the Advisory Base Flood Elevation (ABFE) or other approved local floodplain ordinance.

Scenario 5: Permanent Group Housing Installation of Pre-Fabricated Dwellings on Undeveloped Land

This scenario would create permanent group housing sites on previously undeveloped land. These sites would require full development of infrastructure (i.e. roads, utilities, etc.) in order to create housing sites equivalent to a residential subdivision. Cottages would be elevated to the Advisory Base Flood Elevation (ABFE) or other approved local floodplain ordinance.

Homer Wilkes  
May 9, 2008  
Page 4

Please provide FEMA with a point of contact within your agency so that we may address any concerns or comments you may have relating to any of the proposed scenarios. We would appreciate receiving your concerns/comments as soon as possible. If we have not

heard from you within 30 days, we will assume that the scenarios presented are acceptable for inclusion in the PEA as stated. If you have any questions or need additional information, please contact Leita Hulmes, of my staff, at 228-594-2950 or email at [Leita.Hulmes@associates.dhs.gov](mailto:Leita.Hulmes@associates.dhs.gov).

Sincerely,



Michael Grisham  
Environmental Liaison Officer  
FEMA-1604-DR-MS  
TRO- Biloxi, MS

August 19, 2008



Homer L. Wilkes  
United States Department of Agriculture  
Natural Resources Conservation Services  
100 W. Capital Street  
Jackson, MS 39269

RE: Draft Programmatic Environmental Assessment for the Placement of Permanent Disaster Relief Residential Housing

Dear Mr. Wilkes:

As part of the National Environmental Policy Act of 1969 (NEPA) and its implementing regulations 40 Code of Federal Regulations (CFR) Part 1500 and 44 CFR Part 10, the Federal Emergency Management Agency (FEMA) has prepared a Programmatic Environmental Assessment (PEA) to evaluate the environmental consequences of providing permanent housing to displaced residents of Mississippi by the Alternative Housing Pilot Program (AHPP). Through FEMA funding, Mississippi Emergency Management Agency (MEMA) proposes to provide permanent housing within George, Hancock, Harrison, Jackson, Pearl River and Stone Counties. This draft PEA analyzes seven scenarios or alternatives which would provide AHPP permanent installation projects throughout the six affected counties within the State of Mississippi.

Recognizing the extensive and complex housing challenges facing victims and communities as a result of Hurricane Katrina, and acknowledging the limitations on FEMA's ordinary statutory authority to provide non-temporary housing solutions, Congress appropriated funds to the Department of Homeland Security to support alternative housing pilot programs (Emergency Supplemental Appropriations Act, 2006, P.L. 109-234). The AHPP represents a one-time exception to FEMA's existing authority under the Stafford Act, which legally binds FEMA to a temporary housing mission reliant primarily on travel trailers and manufactured homes, by providing an opportunity to explore, implement, and evaluate innovative approaches to housing solutions, and to address ongoing housing challenges created by the 2005 hurricane season in the states of the Gulf Coast region, including the State of Mississippi.

Based on the NEPA analysis, FEMA has determined that this PEA fully and accurately describes the impacts on the human and natural environment. FEMA will prepare a memorandum documenting this determination and stating that FEMA has reviewed the alternatives, and all direct, indirect and cumulative impacts, and found them to be accurately described in the PEA. Should FEMA determine that an action has the

potential to affect a specific resource; a tiered Supplemental Environmental Assessment (SEA) would be prepared. Additionally, should an action fall outside the scenarios illustrated in the PEA, FEMA would prepare an EA for that proposed action.

At this time, FEMA requests that your agency review the draft PEA and provide any comments to FEMA by September 1, 2008, via the contact information below. Any concerns or comments raised will be addressed in the PEA. Please send all comments to Michael Grisham via fax (228) 385-7884 or email at [pea-comments@dhs.gov](mailto:pea-comments@dhs.gov).

Sincerely,

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Michael Grisham  
FEMA Environmental Liaison Officer  
FEMA/State Transitional Recovery Officer  
220 Popps Ferry Road, Building A South  
Biloxi, MS 39531



**FEMA**

May 9, 2008

Mr. Jim Woodrick  
MS Dept of Archives and History  
P.O. Box 571  
Jackson, MS 39205-0571

RE: Consultation request for proposed Programmatic Environmental Assessment for the Placement of Permanent Disaster Relief Residential Housing

Dear Mr. Woodrick:

Recognizing the extensive and complex housing challenges facing victims and communities as a result of Hurricane Katrina and acknowledging the limitations on Federal Emergency Management Agency's (FEMA) ordinary statutory authority to provide non-temporary housing solutions, Congress appropriated funds to the Department of Homeland Security to support alternative housing pilot programs (Emergency Supplemental Appropriations Act, 2006, P.L. 109-234). The Alternative Housing Pilot Program (AHPP) represents a one-time exception to FEMA's existing authority under the Stafford Act, which legally binds FEMA to a temporary housing mission reliant primarily on travel trailers and manufactured homes, by providing an opportunity to explore, implement, and evaluate innovative approaches to housing solutions, and to address ongoing housing challenges created by the 2005 hurricane season in the states of the Gulf Coast region, including the State of Mississippi.

The Mississippi Emergency Management Agency (MEMA) applied for FEMA funding under the AHPP to provide both temporary and permanent housing solutions for eligible families displaced from Katrina. Since the inception of AHPP in Mississippi, MEMA provided for approximately 2,000 temporary Mississippi Cottages. MEMA proposes to provide permanent housing within George, Hancock, Harrison, Jackson, Pearl River and Stone Counties.

The National Environmental Policy Act of 1969 (NEPA) and its implementing regulations 40 C.F.R. Part 1500 and 44 C.F.R. Part 10 direct FEMA to take into consideration the environmental consequences of proposed actions during the decision-making process. FEMA must comply with NEPA before making federal funds available for all FEMA programs.

FEMA determined that the recurring proposed actions that require an Environmental Assessment (EA) can be grouped by the nature and location of the proposed actions.

These actions can be evaluated through a Programmatic Environmental Assessment (PEA) for compliance with NEPA and its implementing regulations without developing an EA for every action. FEMA determined that a PEA can be prepared to analyze the potential environmental impacts of MEMA's proposed permanent housing phase within the six above mentioned counties. Gulf South Research Corporation (GSRC) has been retained by FEMA to prepare a PEA for the AHPP permanent installation projects.

FEMA will use this PEA to determine the level of environmental documentation required under NEPA for any proposed permanent housing action in Mississippi, given the available site-specific information. If the alternatives, levels of analysis, and site-specific information of an action proposed for FEMA funding are fully and accurately described in this PEA, FEMA will prepare a memorandum documenting this determination. This memorandum would state that FEMA has reviewed the proposed action, alternatives, and potential direct, indirect and cumulative impacts and found them to be accurately described by this PEA and its associated Finding of No Significant Impact (FONSI). Should FEMA determine that an action has the potential to affect a resource, a tiered Supplemental Environmental Assessment (SEA) would be prepared. Should an action fall outside the scenarios illustrated below, FEMA would prepare an EA for that proposed action.

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Jim Woodrick  
May 9, 2008  
Page 4

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Sincerely,

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Michael Grisham  
Environmental Liaison Officer  
FEMA-1604-DR-MS  
TRO- Biloxi, MS



HISTORIC PRESERVATION

Ken P'Pool, director • Jim Woodrick, acting director  
PO Box 571, Jackson, MS 39205-0571  
601-576-6940 • Fax 601-576-6955  
mdah.state.ms.us

June 17, 2008

Mr. Michael Grisham  
Environmental Liaison Officer  
FEMA-DR-1604-MS  
220 Popp's Ferry Road, Bldg. A South  
Biloxi, Mississippi 39531

RE: Consultation request for proposed Programmatic Environmental Assessment for the Placement of Permanent Disaster Relief Residential Housing, MDAH Project Log #05-083-08

Dear Mike:

We have reviewed your request for our review of the proposed Programmatic Environmental Assessment, received on May 12, 2008, in accordance with our responsibilities under Section 106 of the National Historic Preservation Act and 36 CFR Part 800. After reviewing the proposed environmental assessment, our only concern with any of the scenarios is with Scenario 3: Permanent Installation of Pre-Fabricated Dwellings on Undeveloped Land. Our concern is with the placement of "Mississippi Cottages" in listed and/or eligible National Register Historic Districts. While we do have some concerns with this scenario, we do not have any recommendations on how this may be addressed programmatically. We would certainly appreciate guidance from FEMA in addressing this concern, if deemed appropriate.

If you have any questions, please do not hesitate to call.

Sincerely,

A handwritten signature in blue ink that reads "Jim".

Jim Woodrick  
Review and Compliance Officer

FOR: H.T. Holmes  
State Historic Preservation Officer

c: Clearinghouse for Federal Programs

August 19, 2008



Jim Woodrick  
Mississippi Department of Archives and History  
Historic Preservation  
100 South State Street  
Jackson, MS 39201

RE: Draft Programmatic Environmental Assessment for the Placement of Permanent Disaster Relief Residential Housing

Dear Mr. Woodrick:

As part of the National Environmental Policy Act of 1969 (NEPA) and its implementing regulations 40 Code of Federal Regulations (CFR) Part 1500 and 44 CFR Part 10, the Federal Emergency Management Agency (FEMA) has prepared a Programmatic Environmental Assessment (PEA) to evaluate the environmental consequences of providing permanent housing to displaced residents of Mississippi by the Alternative Housing Pilot Program (AHPP). Through FEMA funding, Mississippi Emergency Management Agency (MEMA) proposes to provide permanent housing within George, Hancock, Harrison, Jackson, Pearl River and Stone Counties. This draft PEA analyzes seven scenarios or alternatives which would provide AHPP permanent installation projects throughout the six affected counties within the State of Mississippi.

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Michael Grisham  
FEMA Environmental Liaison Officer  
FEMA/State Transitional Recovery Officer  
220 Popps Ferry Road, Building A South  
Biloxi, MS 39531



**FEMA**

May 9, 2008

Mr. James D. Giattina  
US EPA Region 4 Water Mgmt Division  
Sam Nunn Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, GA 30303-8960

RE: Consultation request for proposed Programmatic Environmental Assessment for  
the Placement of Permanent Disaster Relief Residential Housing

Dear Mr. Giattina:

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James Giattina  
May 9, 2008  
Page 4

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Sincerely,



Michael Grisham  
Environmental Liaison Officer  
FEMA-1604-DR-MS  
TRO- Biloxi, MS

August 19, 2008



James D. Giattina  
United States Environmental Protection Agency  
Region 4 Water Management Division  
61 Forsyth Street, SW  
Atlanta, GA 30303-8960

RE: Draft Programmatic Environmental Assessment for the Placement of Permanent Disaster Relief Residential Housing

Dear Mr. Giattina:

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Michael Grisham  
FEMA Environmental Liaison Officer  
FEMA/State Transitional Recovery Officer  
220 Popps Ferry Road, Building A South  
Biloxi, MS 39531



**FEMA**

May 9, 2008

Ms. Michelle Vinson  
MS DEQ, Office of Pollution Control, Environmental Permits Division  
P.O. Box 2261  
Jackson, MS 39289-0385

RE: Consultation request for proposed Programmatic Environmental Assessment for the Placement of Permanent Disaster Relief Residential Housing

Dear Ms Vinson:

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Scenario 4: Permanent Group Housing Installation of Pre-Fabricated Dwellings in Pre-Existing Group/Commercial Sites

This scenario would create permanent group housing sites on pre-existing or vacant group, residential, and commercial housing sites. This would include the use of vacant mobile home communities and former FEMA temporary trailer sites. These sites would require full development of infrastructure (i.e. roads, utilities, etc.), creating housing sites equivalent to a residential housing subdivision. Cottages would be elevated to the Advisory Base Flood Elevation (ABFE) or other approved local floodplain ordinance.

Scenario 5: Permanent Group Housing Installation of Pre-Fabricated Dwellings on Undeveloped Land

This scenario would create permanent group housing sites on previously undeveloped land. These sites would require full development of infrastructure (i.e. roads, utilities, etc.) in order to create housing sites equivalent to a residential subdivision. Cottages would be elevated to the Advisory Base Flood Elevation (ABFE) or other approved local floodplain ordinance.

Please provide FEMA with a point of contact within your agency so that we may address any concerns or comments you may have relating to any of the proposed scenarios. We would appreciate receiving your concerns/comments as soon as possible. If we have not

Michelle Vinson  
May 9, 2008  
Page 4

heard from you within 30 days, we will assume that the scenarios presented are acceptable for inclusion in the PEA as stated. If you have any questions or need additional information, please contact Leita Hulmes, of my staff, at 228-594-2950 or email at [Leita.Hulmes@associates.dhs.gov](mailto:Leita.Hulmes@associates.dhs.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Grisham". The signature is fluid and cursive, with the first name "Michael" and last name "Grisham" clearly distinguishable.

Michael Grisham  
Environmental Liaison Officer  
FEMA-1604-DR-MS  
TRO- Biloxi, MS



STATE OF MISSISSIPPI  
HALEY BARBOUR  
GOVERNOR  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY  
TRUDY D. FISHER, EXECUTIVE DIRECTOR

June 10, 2008

Mr. Michael Grisham  
Environmental Liaison Officer  
Department of Homeland Security/FEMA  
Transitional Recovery Office  
220 Popps Ferry Road  
Biloxi, Mississippi 39531

Dear Mr. Grisham:

Re: Environmental Review  
Disaster Relief Residential Housing  
George, Hancock, Harrison, Jackson,  
Pearl River, and Stone Counties

We have reviewed the information submitted on the referenced proposed project. The project is to establish The Alternative Housing Pilot Program which will through 5 alternative scenarios provide permanent residential housing to victims displaced by Hurricane Katrina by converting the existing temporary Mississippi Cottages into permanent housing. From the information reviewed, we know of no adverse environmental impact from implementation of the proposed project. The Corps of Engineers should be contacted on any jurisdictional wetland issues.

If this project will be disturbing 1 acre or more of land, coverage under a General Permit for control of erosion and sediment will be required in accordance with Storm Water Regulations. Please contact Mr. Jim Morris, Chief of the General Permits Branch with the Environmental Permits Division of the Office of Pollution Control for more information at 601-961-5151 or [Jim\\_Morris@deq.state.ms.us](mailto:Jim_Morris@deq.state.ms.us).

This letter should not be interpreted as equivalent to any approval or permit that may be required by pollution control laws. Neither is this a Water Quality Certification. We would remind you that the plans and specification for work on a wastewater system must be submitted to our office prior to construction.

If you have any questions, call us at 601-961-5159.

Sincerely,

A handwritten signature in blue ink, appearing to read "Glenn L. Odom".

Glenn L. Odom, PE, BCEE, Chief  
Program Support Branch  
Surface Water Division

August 19, 2008



Glenn Odom  
Mississippi Department of Environmental Quality  
Office of Pollution Control, Environmental Permits Division  
P.O. Box 2261  
Jackson, MS 39289-0385

RE: Draft Programmatic Environmental Assessment for the Placement of Permanent Disaster Relief Residential Housing

Dear Mr. Odom:

As part of the National Environmental Policy Act of 1969 (NEPA) and its implementing regulations 40 Code of Federal Regulations (CFR) Part 1500 and 44 CFR Part 10, the Federal Emergency Management Agency (FEMA) has prepared a Programmatic Environmental Assessment (PEA) to evaluate the environmental consequences of providing permanent housing to displaced residents of Mississippi by the Alternative Housing Pilot Program (AHPP). Through FEMA funding, Mississippi Emergency Management Agency (MEMA) proposes to provide permanent housing within George, Hancock, Harrison, Jackson, Pearl River and Stone Counties. This draft PEA analyzes seven scenarios or alternatives which would provide AHPP permanent installation projects throughout the six affected counties within the State of Mississippi.

Recognizing the extensive and complex housing challenges facing victims and communities as a result of Hurricane Katrina, and acknowledging the limitations on FEMA's ordinary statutory authority to provide non-temporary housing solutions, Congress appropriated funds to the Department of Homeland Security to support alternative housing pilot programs (Emergency Supplemental Appropriations Act, 2006, P.L. 109-234). The AHPP represents a one-time exception to FEMA's existing authority under the Stafford Act, which legally binds FEMA to a temporary housing mission reliant primarily on travel trailers and manufactured homes, by providing an opportunity to explore, implement, and evaluate innovative approaches to housing solutions, and to address ongoing housing challenges created by the 2005 hurricane season in the states of the Gulf Coast region, including the State of Mississippi.

Based on the NEPA analysis, FEMA has determined that this PEA fully and accurately describes the impacts on the human and natural environment. FEMA will prepare a memorandum documenting this determination and stating that FEMA has reviewed the alternatives, and all direct, indirect and cumulative impacts, and found them to be accurately described in the PEA. Should FEMA determine that an action has the

potential to affect a specific resource; a tiered Supplemental Environmental Assessment (SEA) would be prepared. Additionally, should an action fall outside the scenarios illustrated in the PEA, FEMA would prepare an EA for that proposed action.

At this time, FEMA requests that your agency review the draft PEA and provide any comments to FEMA by September 1, 2008, via the contact information below. Any concerns or comments raised will be addressed in the PEA. Please send all comments to Michael Grisham via fax (228) 385-7884 or email at [pea-comments@dhs.gov](mailto:pea-comments@dhs.gov).

Sincerely,

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Michael Grisham  
FEMA Environmental Liaison Officer  
FEMA/State Transitional Recovery Officer  
220 Popps Ferry Road, Building A South  
Biloxi, MS 39531



**FEMA**

May 9, 2008

Mr. Ray Aycock  
US Fish & Wildlife Service  
6578 Dogwood View Parkway  
Suite A  
Jackson, MS 39213

RE: Consultation request for proposed Programmatic Environmental Assessment for the Placement of Permanent Disaster Relief Residential Housing

Dear Mr. Aycock:

Recognizing the extensive and complex housing challenges facing victims and communities as a result of Hurricane Katrina and acknowledging the limitations on Federal Emergency Management Agency's (FEMA) ordinary statutory authority to provide non-temporary housing solutions, Congress appropriated funds to the Department of Homeland Security to support alternative housing pilot programs (Emergency Supplemental Appropriations Act, 2006, P.L. 109-234). The Alternative Housing Pilot Program (AHPP) represents a one-time exception to FEMA's existing authority under the Stafford Act, which legally binds FEMA to a temporary housing mission reliant primarily on travel trailers and manufactured homes, by providing an opportunity to explore, implement, and evaluate innovative approaches to housing solutions, and to address ongoing housing challenges created by the 2005 hurricane season in the states of the Gulf Coast region, including the State of Mississippi.

The Mississippi Emergency Management Agency (MEMA) applied for FEMA funding under the AHPP to provide both temporary and permanent housing solutions for eligible families displaced from Katrina. Since the inception of AHPP in Mississippi, MEMA provided for approximately 2,000 temporary Mississippi Cottages. MEMA proposes to provide permanent housing within George, Hancock, Harrison, Jackson, Pearl River and Stone Counties.

The National Environmental Policy Act of 1969 (NEPA) and its implementing regulations 40 C.F.R. Part 1500 and 44 C.F.R. Part 10 direct FEMA to take into consideration the environmental consequences of proposed actions during the decision-making process. FEMA must comply with NEPA before making federal funds available for all FEMA programs.

FEMA determined that the recurring proposed actions that require an Environmental Assessment (EA) can be grouped by the nature and location of the proposed actions. These actions can be evaluated through a Programmatic Environmental Assessment (PEA) for compliance with NEPA and its implementing regulations without developing an EA for every action. FEMA determined that a PEA can be prepared to analyze the potential environmental impacts of MEMA's proposed permanent housing phase within the six above mentioned counties. Gulf South Research Corporation (GSRC) has been retained by FEMA to prepare a PEA for the AHPP permanent installation projects.

FEMA will use this PEA to determine the level of environmental documentation required under NEPA for any proposed permanent housing action in Mississippi, given the available site-specific information. If the alternatives, levels of analysis, and site-specific information of an action proposed for FEMA funding are fully and accurately described in this PEA, FEMA will prepare a memorandum documenting this determination. This memorandum would state that FEMA has reviewed the proposed action, alternatives, and potential direct, indirect and cumulative impacts and found them to be accurately described by this PEA and its associated Finding of No Significant Impact (FONSI). Should FEMA determine that an action has the potential to affect a resource, a tiered Supplemental Environmental Assessment (SEA) would be prepared. Should an action fall outside the scenarios illustrated below, FEMA would prepare an EA for that proposed action.

At this time, FEMA requests that your agency review the five scenarios presented below. Please provide comments and any available information under your agency's jurisdiction to aid in the preparation and expedited approval of this PEA. Any concerns raised will be addressed in the PEA, and formal consultation will allow for your review of the final document.

Scenario 1: Conversion of Temporary Pre-Fabricated Dwellings on Previously Developed Land to Permanent Pre-Fabricated Dwellings.

Existing, temporary Mississippi Cottages will be made permanent by replacing temporary foundations at the same location and footprint and replacing existing, above-ground utilities with buried utilities. Over 1000 of the existing temporary units fall within the Coastal High Hazard Area (CHHA) (Flood zone V). No permanent housing will be allowed in a V-zone. The lessees have the option of finding a new location outside of this CHHA for placement of a permanent unit. These sites would then fall under Scenario 2 or 3.

As these cottages were reviewed for NEPA compliance during initial installation, FEMA does not anticipate the need to consult with applicable agencies (i.e., USACE, USFWS, SHPO, THPO, etc.) as long as FEMA has identified that there are no resources under their jurisdiction present on the project site or within such vicinity that the action has potential to affect that resource. Should a consultation

agency wish, FEMA would prepare a document of determination supporting its conclusion for submittal to the agency.

Scenario 2: Permanent Installation of Pre-Fabricated Dwellings on Previously Developed Land.

This scenario would place Mississippi Cottages on permanent foundations with in-ground utilities. Cottages would be elevated to the Advisory Base Flood Elevation (ABFE) or other approved local floodplain ordinance. Projects under this scenario may require ground disturbing activities including the demolition of the former housing structure, slab/foundation removal and the refurbishment of existing utilities (i.e. utility lines, septic systems, water wells, etc.)

Scenario 3: Permanent Installation of Pre-Fabricated Dwellings on Undeveloped Land

This scenario would place Mississippi Cottages on permanent foundations with in-ground utilities. This scenario may involve placement of an individual unit onto a single vacant lot or moving an existing Cottage within the same property. Cottages would be elevated to the Advisory Base Flood Elevation (ABFE) or other approved local floodplain ordinance. Projects under this scenario may require ground disturbing activities including installation of utilities (i.e. utility lines, septic systems, water wells, etc.) and entryways (driveways, sidewalks, etc.)

Scenario 4: Permanent Group Housing Installation of Pre-Fabricated Dwellings in Pre-Existing Group/Commercial Sites

This scenario would create permanent group housing sites on pre-existing or vacant group, residential, and commercial housing sites. This would include the use of vacant mobile home communities and former FEMA temporary trailer sites. These sites would require full development of infrastructure (i.e. roads, utilities, etc.), creating housing sites equivalent to a residential housing subdivision. Cottages would be elevated to the Advisory Base Flood Elevation (ABFE) or other approved local floodplain ordinance.

Scenario 5: Permanent Group Housing Installation of Pre-Fabricated Dwellings on Undeveloped Land

This scenario would create permanent group housing sites on previously undeveloped land. These sites would require full development of infrastructure (i.e. roads, utilities, etc.) in order to create housing sites equivalent to a residential subdivision. Cottages would be elevated to the Advisory Base Flood Elevation (ABFE) or other approved local floodplain ordinance.

Ray Aycock  
May 9, 2008  
Page 4

Please provide FEMA with a point of contact within your agency so that we may address any concerns or comments you may have relating to any of the proposed scenarios. We would appreciate receiving your concerns/comments as soon as possible. If we have not

heard from you within 30 days, we will assume that the scenarios presented are acceptable for inclusion in the PEA as stated. If you have any questions or need additional information, please contact Leita Hulmes, of my staff, at 228-594-2950 or email at [Leita.Hulmes@associates.dhs.gov](mailto:Leita.Hulmes@associates.dhs.gov).

Sincerely,

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Michael Grisham  
Environmental Liaison Officer  
FEMA-1604-DR-MS  
TRO- Biloxi, MS



## United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Mississippi Field Office  
6578 Dogwood View Parkway, Suite A  
Jackson, Mississippi 39213

May 27, 2008

Mr. Michael Grisham  
Environmental Liaison Officer  
FEMA-1604-DR-MS  
TRO – Biloxi  
220 Popps Ferry Rd.  
Biloxi, MS 39531

Dear Mr. Collins:

The U.S. Fish and Wildlife Service (Service) has reviewed the information in your letter dated May 9, 2008, regarding the Federal Emergency Management Agency's (FEMA) Programmatic Environmental Assessment for the placement of permanent disaster relief residential housing. The Alternative Housing Pilot Program (AHPP) represents a one-time exception to FEMA's existing authority under the Stafford Act, which legally binds FEMA to a temporary housing mission reliant on travel trailers and manufactured homes. The Mississippi Emergency Management Agency (MEMA) has applied for funds under the AHPP to provide both temporary and permanent housing solutions for eligible families displaced from Hurricane Katrina. MEMA proposes to provide permanent housing within George, Hancock, Harrison, Jackson, Pearl River, and Stone Counties, Mississippi. Our comments are submitted in accordance with the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.).

Since the inception of AHPP in Mississippi, MEMA provided for approximately 2,000 temporary Mississippi Cottages. There are five scenarios proposed that would apply to MEMA's current proposal under the AHPP.

Scenario 1: Conversion of temporary pre-fabricated dwelling on Previously Developed land to permanent pre-fabricated dwellings.

Existing temporary Mississippi Cottages will be made permanent by replacing temporary foundations at the same location and footprint and replacing existing above-ground utilities with buried utilities. No permanent housing will be allowed within the Coastal High Hazard Area (CHHA) (Flood Zone V). The lessees have the option of finding a new

location outside this CHHA for placement of a permanent unit, which would fall under Scenario 2 or 3.

Scenario 2: Permanent installation of pre-fabricated dwellings on Previously Developed land.

This scenario would place Mississippi Cottages on permanent foundations with in-ground utilities. Cottages would be elevated to the Advisory Base Flood Elevation (ABFE) or other approved local floodplain ordinance. Projects under this scenario may require ground disturbing activities including the demolition of the former housing structure, slab/foundation removal and the refurbishment of existing utilities.

Scenario 3: Permanent installation of pre-fabricated dwellings on Un-developed land.

This scenario would place Mississippi Cottages on permanent foundations with in-ground utilities. This scenario may involve placement of an individual unit onto a single vacant lot or moving an existing Cottage within the same property. Cottages would be elevated to the Advisory Base Flood Elevation (ABFE) or other approved local floodplain ordinance. Projects under this scenario may require ground disturbing activities including installation of utilities and entryways.

Scenario 4: Permanent group housing installation of pre-fabricated dwellings in pre-existing group/commercial sites.

This scenario would create permanent group housing sites on pre-existing or vacant group, residential, and commercial housing sites. This would include the use of vacant mobile home communities and former FEMA temporary trailer sites. These sites would require full development of infrastructure, creating housing sites equivalent to a residential housing subdivision. Cottage would be elevated to the ABFE or other approved local floodplain ordinance.

Scenario 5: Permanent group housing installation of pre-fabricated dwelling on Undeveloped Land.

This scenario would create permanent group housing sites on undeveloped land. These sites would require full development of infrastructure in order to create housing sites equivalent to a residential housing subdivision. Cottage would be elevated to the ABFE or other approved local floodplain ordinance.

It is the Service's opinion that any actions requiring alteration of undisturbed land or expansion or creation of a new footprint, as described in scenarios three (3) and five (5) above, may affect threatened and endangered (T&E) species, requiring further consultation with the Service. Any action that takes place within the same structural footprint, as described in scenario one (1) and two (2) above, should not affect T&E species. Scenario four (4) stated that the housing would be

located within pre-existing group/commercial sites. In the description of this scenario it states that “these sites would require full development of infrastructure...” which seems to defeat the purpose of using pre-existing sites. If indeed these sites are pre-existing, then existing infrastructure should only need to be modified to accommodate permanent housing as in Scenarios one (1) and two (2). The Service requests clarification on Scenario four (4) prior to providing an opinion on its affect on T&E species.

The Service has determined that the following federally listed species and/or their habitats could be located within the project area and should be considered when permanently installing Mississippi Cottages:

The threatened gopher tortoise (*Gopherus polyphemus*) inhabits well-drained sandy soils, especially in areas of longleaf pine. The gopher tortoise digs a burrow used as a shelter and nesting area. Groups of these tortoises dig burrows in the same location forming a colony. In addition, the threatened eastern indigo snake (*Drymarchon corais couperi*) is known to inhabit gopher tortoise burrows.

The endangered red-cockaded woodpecker (*Picoides borealis*) (RCW) is a species of southern pine forests. RCW's excavate nesting cavities in mature pine trees (60+ years old). The preferred nesting habitat is open, park-like, mature pine woodlands with few or no hardwood trees present. A mated pair of birds and all helper birds forms a clan. A cluster of cavity trees where the clan nests and roosts is called a colony. All cavity trees, active and inactive, are important to the colony and should therefore be avoided. Preferred feeding habitats are pine stands with trees 23 cm (9in.) and greater in diameter. Therefore, pine stands with this diameter and greater within a half-mile of a colony should be considered foraging habitat and should not be disturbed. These areas may or may not include a significant hardwood component.

The endangered plant, Louisiana quillwort (*Isoetes louisianensis*), is a nonflowering grasslike plant that lives in or near shallow, blackwater streams in riparian woodland and bayhead forests of pine flatwoods and upland pine forests. Mature plants are six to ten inches high, mostly evergreen, with spore-bearing structures below the ground.

The black pine snake (*Pituophis melanoleucus spp. lodingi*) a candidate species, prefers uplands with well-drained sandy soils in areas of longleaf pine and hardwood tree species.

The endangered Alabama red-bellied turtle (*Pseudemys alabamensis*) is found in the lower Pascagoula River and its tributaries: Bluff Creek and the Escatawpa River. It is also found in Old Fort Bayou, the Tchoutacabouffa River, the Biloxi River, and the Back Bay of Biloxi. Destruction of nesting areas along river banks and feeding areas of submerged aquatic vegetation, and reduced water quality have impacted this species. Red-bellied turtles in Mississippi are somewhat different from those in Alabama, having fewer or less conspicuous head-stripes, a narrower head, less-conspicuous cusps (particularly on hatchlings), darker background color on the carapace and skin, and a relatively longer, narrower shell.

The federally listed threatened Louisiana black bear (*Ursus a. luteolus*) occurs primarily in

bottomland hardwood and floodplain forests along the Mississippi River and the southern part of the state. Although the bear is capable of surviving under a range of habitat types, some necessary habitat requirements include hard mast, soft mast, escape cover, denning sites, forested corridors, and limited human access. Forest management practices, agricultural, commercial and industrial development, and highways can cause adverse impacts to bear habitat by increasing human disturbance, fragmenting forests, and removing den trees.

The endangered Mississippi gopher frog (*Rana sevosia*), requires two distinct habitats: temporary pools for breeding and upland foraging sites with a subterranean refuge (tortoise burrows, crawfish burrows, or stumpholes). The only population currently known to exist is located in Harrison County, Mississippi.

The threatened Gulf sturgeon (*Acipenser oxyrhynchus desotoi*) is found in the Pearl, Leaf, and Pascagoula Rivers. Gulf sturgeons are primitive, anadromous fish that annually migrate from the Gulf of Mexico into freshwater streams. Subadults and adults spend eight to nine months each year in rivers. Although Gulf sturgeon activity is not well documented, the species has been found in the Pearl River as far north as the Jackson metropolitan area. The decline of the Gulf sturgeon is primarily due to limited access to migration routes and historic spawning areas, habitat modification, and water quality degradation. Critical Habitat has been designated along the Mississippi Gulf Coast, and the Pearl, Leaf, and Pascagoula Rivers.

The threatened yellow-blotched map turtle (*Graptemys flavimaculata*) is found in the Chickasawhay, Leaf, and Pascagoula Rivers. The yellow-blotched map turtle prefers river stretches with moderate currents, abundant basking sites, and sand bars. Stream modification has significantly contributed to the decline of the species.

The threatened ringed map turtle (*Graptemys oculifera*) is found in the Pearl River. It prefers river stretches with moderate currents, abundant basking sites, and sand bars for nesting. Stream modification in the Pearl River, such as flood control and urban development, has significantly contributed to the decline of the species. Also, water quality degradation has posed a serious problem for the turtle.

The endangered Brown pelican (*Pelecanus occidentalis*) nests mostly on offshore islands, but has been known to nest in onshore estuaries. Nesting areas are usually in low shrubs, trees or on the ground, and contain groups of 25-250 birds. They also congregate to feed near coastal wharves and pilings. Disturbance of nesting areas should be avoided.

The threatened Piping Plover (*Charadrius melodus*) does not nest in Mississippi but winters along the coastal beaches and barrier islands. These feeding areas have been threatened by urban development. Hence, Critical Habitat has been designated along several areas of the Mississippi Gulf Coast.

The endangered Mississippi Sandhill Crane (*Grus canadensis pulla*) is found only in a small area west of the Pascagoula River in Jackson County. Critical Habitat has been established on and adjacent to the Mississippi Sandhill Crane National Wildlife Refuge.

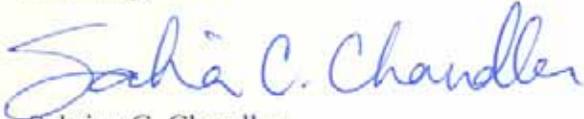
The recently de-listed bald eagle (*Haliaeetus leucocephalus*) is the only species of sea eagle regularly occurring on the North American continent. The bald eagle is predominantly a winter migrant in the southeast; however, increasing occurrences of nesting have been observed. The bald eagle nests in the transitional area between forest and water. They construct their nests in dominant living pines or bald cypress trees. Eagles often use alternate nests in different years with nesting activity beginning between September and January of each year. Young are usually fledged by midsummer. Although Bald Eagles are no longer protected by the Endangered Species Act, they continue to be protected by the Bald and Golden Eagle Protection Act.

All of the above listed species are very sensitive to human disturbance. Therefore, before the use or transportation of any heavy construction equipment, or the removal of any vegetation within potential habitats, the Service recommends a qualified biologist conduct a visual survey for these species. Areas surveyed should also include ingress and egress areas, equipment storage areas, and staging areas. If any of these species or their habitats is identified, further consultation with the Service will be necessary.

These scenarios also may have the potential to impact wetlands. The Service recommends that you contact the U.S. Army Corps of Engineers Mobile District to avoid potential impacts to wetlands. They can be reached at 251-690-2658.

If you have any additional questions, please feel free to contact Sabrina Chandler at (601) 321-1135 or by email at [sabrina\\_chandler@fws.gov](mailto:sabrina_chandler@fws.gov).

Sincerely,

  
Sabrina C. Chandler  
Wildlife Biologist

August 19, 2008



Sabrina Chandler  
United States Department of the Interior  
Fish and Wildlife Service, Mississippi Field Office  
6578 Dogwood View Parkway  
Jackson, MS 39213

RE: Draft Programmatic Environmental Assessment for the Placement of Permanent Disaster Relief Residential Housing

Dear Ms. Chandler:

As part of the National Environmental Policy Act of 1969 (NEPA) and its implementing regulations 40 Code of Federal Regulations (CFR) Part 1500 and 44 CFR Part 10, the Federal Emergency Management Agency (FEMA) has prepared a Programmatic Environmental Assessment (PEA) to evaluate the environmental consequences of providing permanent housing to displaced residents of Mississippi by the Alternative Housing Pilot Program (AHPP). Through FEMA funding, Mississippi Emergency Management Agency (MEMA) proposes to provide permanent housing within George, Hancock, Harrison, Jackson, Pearl River and Stone Counties. This draft PEA analyzes seven scenarios or alternatives which would provide AHPP permanent installation projects throughout the six affected counties within the State of Mississippi.

Recognizing the extensive and complex housing challenges facing victims and communities as a result of Hurricane Katrina, and acknowledging the limitations on FEMA's ordinary statutory authority to provide non-temporary housing solutions, Congress appropriated funds to the Department of Homeland Security to support alternative housing pilot programs (Emergency Supplemental Appropriations Act, 2006, P.L. 109-234). The AHPP represents a one-time exception to FEMA's existing authority under the Stafford Act, which legally binds FEMA to a temporary housing mission reliant primarily on travel trailers and manufactured homes, by providing an opportunity to explore, implement, and evaluate innovative approaches to housing solutions, and to address ongoing housing challenges created by the 2005 hurricane season in the states of the Gulf Coast region, including the State of Mississippi.

Based on the NEPA analysis, FEMA has determined that this PEA fully and accurately describes the impacts on the human and natural environment. FEMA will prepare a memorandum documenting this determination and stating that FEMA has reviewed the alternatives, and all direct, indirect and cumulative impacts, and found them to be accurately described in the PEA. Should FEMA determine that an action has the

potential to affect a specific resource; a tiered Supplemental Environmental Assessment (SEA) would be prepared. Additionally, should an action fall outside the scenarios illustrated in the PEA, FEMA would prepare an EA for that proposed action.

At this time, FEMA requests that your agency review the draft PEA and provide any comments to FEMA by September 1, 2008, via the contact information below. Any concerns or comments raised will be addressed in the PEA. Please send all comments to Michael Grisham via fax (228) 385-7884 or email at [pea-comments@dhs.gov](mailto:pea-comments@dhs.gov).

Sincerely,

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Michael Grisham  
FEMA Environmental Liaison Officer  
FEMA/State Transitional Recovery Officer  
220 Popps Ferry Road, Building A South  
Biloxi, MS 39531



**FEMA**

May 9, 2008

Ms Robin Zantow  
MS DMR, Bureau of wetlands Permitting  
1141 Bayview Avenue  
Biloxi, MS 39530

RE: Consultation request for proposed Programmatic Environmental Assessment for the Placement of Permanent Disaster Relief Residential Housing

Dear Ms. Zantow:

Recognizing the extensive and complex housing challenges facing victims and communities as a result of Hurricane Katrina and acknowledging the limitations on Federal Emergency Management Agency's (FEMA) ordinary statutory authority to provide non-temporary housing solutions, Congress appropriated funds to the Department of Homeland Security to support alternative housing pilot programs (Emergency Supplemental Appropriations Act, 2006, P.L. 109-234). The Alternative Housing Pilot Program (AHPP) represents a one-time exception to FEMA's existing authority under the Stafford Act, which legally binds FEMA to a temporary housing mission reliant primarily on travel trailers and manufactured homes, by providing an opportunity to explore, implement, and evaluate innovative approaches to housing solutions, and to address ongoing housing challenges created by the 2005 hurricane season in the states of the Gulf Coast region, including the State of Mississippi.

The Mississippi Emergency Management Agency (MEMA) applied for FEMA funding under the AHPP to provide both temporary and permanent housing solutions for eligible families displaced from Katrina. Since the inception of AHPP in Mississippi, MEMA provided for approximately 2,000 temporary Mississippi Cottages. MEMA proposes to provide permanent housing within George, Hancock, Harrison, Jackson, Pearl River and Stone Counties.

The National Environmental Policy Act of 1969 (NEPA) and its implementing regulations 40 C.F.R. Part 1500 and 44 C.F.R. Part 10 direct FEMA to take into consideration the environmental consequences of proposed actions during the decision-making process. FEMA must comply with NEPA before making federal funds available for all FEMA programs.

FEMA determined that the recurring proposed actions that require an Environmental Assessment (EA) can be grouped by the nature and location of the proposed actions.

These actions can be evaluated through a Programmatic Environmental Assessment (PEA) for compliance with NEPA and its implementing regulations without developing an EA for every action. FEMA determined that a PEA can be prepared to analyze the potential environmental impacts of MEMA's proposed permanent housing phase within the six above mentioned counties. Gulf South Research Corporation (GSRC) has been retained by FEMA to prepare a PEA for the AHPP permanent installation projects.

FEMA will use this PEA to determine the level of environmental documentation required under NEPA for any proposed permanent housing action in Mississippi, given the available site-specific information. If the alternatives, levels of analysis, and site-specific information of an action proposed for FEMA funding are fully and accurately described in this PEA, FEMA will prepare a memorandum documenting this determination. This memorandum would state that FEMA has reviewed the proposed action, alternatives, and potential direct, indirect and cumulative impacts and found them to be accurately described by this PEA and its associated Finding of No Significant Impact (FONSI). Should FEMA determine that an action has the potential to affect a resource, a tiered Supplemental Environmental Assessment (SEA) would be prepared. Should an action fall outside the scenarios illustrated below, FEMA would prepare an EA for that proposed action.

At this time, FEMA requests that your agency review the five scenarios presented below. Please provide comments and any available information under your agency's jurisdiction to aid in the preparation and expedited approval of this PEA. Any concerns raised will be addressed in the PEA, and formal consultation will allow for your review of the final document.

Scenario 1: Conversion of Temporary Pre-Fabricated Dwellings on Previously Developed Land to Permanent Pre-Fabricated Dwellings.

Existing, temporary Mississippi Cottages will be made permanent by replacing temporary foundations at the same location and footprint and replacing existing, above-ground utilities with buried utilities. Over 1000 of the existing temporary units fall within the Coastal High Hazard Area (CHHA) (Flood zone V). No permanent housing will be allowed in a V-zone. The lessees have the option of finding a new location outside of this CHHA for placement of a permanent unit. These sites would then fall under Scenario 2 or 3.

As these cottages were reviewed for NEPA compliance during initial installation, FEMA does not anticipate the need to consult with applicable agencies (i.e., USACE, USFWS, SHPO, THPO, etc.) as long as FEMA has identified that there are no resources under their jurisdiction present on the project site or within such vicinity that the action has potential to affect that resource. Should a consultation agency wish, FEMA would prepare a document of determination supporting its conclusion for submittal to the agency.

Scenario 2: Permanent Installation of Pre-Fabricated Dwellings on Previously Developed Land.

This scenario would place Mississippi Cottages on permanent foundations with in-ground utilities. Cottages would be elevated to the Advisory Base Flood Elevation (ABFE) or other approved local floodplain ordinance. Projects under this scenario may require ground disturbing activities including the demolition of the former housing structure, slab/foundation removal and the refurbishment of existing utilities (i.e. utility lines, septic systems, water wells, etc.)

Scenario 3: Permanent Installation of Pre-Fabricated Dwellings on Undeveloped Land

This scenario would place Mississippi Cottages on permanent foundations with in-ground utilities. This scenario may involve placement of an individual unit onto a single vacant lot or moving an existing Cottage within the same property. Cottages would be elevated to the Advisory Base Flood Elevation (ABFE) or other approved local floodplain ordinance. Projects under this scenario may require ground disturbing activities including installation of utilities (i.e. utility lines, septic systems, water wells, etc.) and entryways (driveways, sidewalks, etc.)

Scenario 4: Permanent Group Housing Installation of Pre-Fabricated Dwellings in Pre-Existing Group/Commercial Sites

This scenario would create permanent group housing sites on pre-existing or vacant group, residential, and commercial housing sites. This would include the use of vacant mobile home communities and former FEMA temporary trailer sites. These sites would require full development of infrastructure (i.e. roads, utilities, etc.), creating housing sites equivalent to a residential housing subdivision. Cottages would be elevated to the Advisory Base Flood Elevation (ABFE) or other approved local floodplain ordinance.

Scenario 5: Permanent Group Housing Installation of Pre-Fabricated Dwellings on Undeveloped Land

This scenario would create permanent group housing sites on previously undeveloped land. These sites would require full development of infrastructure (i.e. roads, utilities, etc.) in order to create housing sites equivalent to a residential subdivision. Cottages would be elevated to the Advisory Base Flood Elevation (ABFE) or other approved local floodplain ordinance.

Please provide FEMA with a point of contact within your agency so that we may address any concerns or comments you may have relating to any of the proposed scenarios. We would appreciate receiving your concerns/comments as soon as possible. If we have not

Robin Zantow  
May 9, 2008  
Page 4

heard from you within 30 days, we will assume that the scenarios presented are acceptable for inclusion in the PEA as stated. If you have any questions or need additional information, please contact Leita Hulmes, of my staff, at 228-594-2950 or email at [Leita.Hulmes@associates.dhs.gov](mailto:Leita.Hulmes@associates.dhs.gov).

Sincerely,



Michael Grisham  
Environmental Liaison Officer  
FEMA-1604-DR-MS  
TRO- Biloxi, MS



MISSISSIPPI  
DEPARTMENT OF MARINE RESOURCES

July 3, 2008

Michael Grisham  
Environmental Liaison Officer  
220 Popp's Ferry Road  
Biloxi, MS 39531

RE: DMR-080744; Consultation request for proposed Programmatic Environmental Assessment for the Placement of Permanent Disaster Residential Housing

Dear Mr. Grisham:

The Department of Marine Resources in cooperation with other state agencies is responsible under the Mississippi Coastal Program (MCP) for managing the coastal resources of Mississippi. Proposed activities in the coastal area are reviewed to insure that the activities are in compliance with the MCP.

The Department has received a request to review five scenarios for permanent housing actions in Mississippi. The Department has no objections to the placement of permanent dwellings on previously developed land or pre-existing group/commercial sites as described in Scenarios 1, 2, and 4. Scenarios 3 and 4 concern placing permanent dwellings or group housing on undeveloped land. Please note that filling of wetlands in conjunction with construction projects is an activity that is regulated by this office as well as the U.S. Army Corps of Engineers. Therefore, any projects where such wetland impacts are anticipated will require consultation with this office and an application form should be submitted for review of the proposed project. Thank you for the opportunity to comment.

For more information or questions concerning this correspondence, contact me at the Bureau of Wetlands Permitting at 228-523-4108 or [willa.brantley@dmr.ms.gov](mailto:willa.brantley@dmr.ms.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Willa J. Brantley", with a long horizontal line extending to the right.

Willa J. Brantley  
Bureau Director, Wetlands Permitting

August 19, 2008



Willa J. Brantley  
Mississippi Department of Marine Resources  
Bureau of Wetlands Permitting  
1141 Bayview Avenue  
Biloxi, MS 39530-1613

RE: Draft Programmatic Environmental Assessment for the Placement of Permanent Disaster Relief Residential Housing

Dear Ms. Brantley:

As part of the National Environmental Policy Act of 1969 (NEPA) and its implementing regulations 40 Code of Federal Regulations (CFR) Part 1500 and 44 CFR Part 10, the Federal Emergency Management Agency (FEMA) has prepared a Programmatic Environmental Assessment (PEA) to evaluate the environmental consequences of providing permanent housing to displaced residents of Mississippi by the Alternative Housing Pilot Program (AHPP). Through FEMA funding, Mississippi Emergency Management Agency (MEMA) proposes to provide permanent housing within George, Hancock, Harrison, Jackson, Pearl River and Stone Counties. This draft PEA analyzes seven scenarios or alternatives which would provide AHPP permanent installation projects throughout the six affected counties within the State of Mississippi.

Recognizing the extensive and complex housing challenges facing victims and communities as a result of Hurricane Katrina, and acknowledging the limitations on FEMA's ordinary statutory authority to provide non-temporary housing solutions, Congress appropriated funds to the Department of Homeland Security to support alternative housing pilot programs (Emergency Supplemental Appropriations Act, 2006, P.L. 109-234). The AHPP represents a one-time exception to FEMA's existing authority under the Stafford Act, which legally binds FEMA to a temporary housing mission reliant primarily on travel trailers and manufactured homes, by providing an opportunity to explore, implement, and evaluate innovative approaches to housing solutions, and to address ongoing housing challenges created by the 2005 hurricane season in the states of the Gulf Coast region, including the State of Mississippi.

Based on the NEPA analysis, FEMA has determined that this PEA fully and accurately describes the impacts on the human and natural environment. FEMA will prepare a memorandum documenting this determination and stating that FEMA has reviewed the alternatives, and all direct, indirect and cumulative impacts, and found them to be accurately described in the PEA. Should FEMA determine that an action has the

potential to affect a specific resource; a tiered Supplemental Environmental Assessment (SEA) would be prepared. Additionally, should an action fall outside the scenarios illustrated in the PEA, FEMA would prepare an EA for that proposed action.

At this time, FEMA requests that your agency review the draft PEA and provide any comments to FEMA by September 1, 2008, via the contact information below. Any concerns or comments raised will be addressed in the PEA. Please send all comments to Michael Grisham via fax (228) 385-7884 or email at [pea-comments@dhs.gov](mailto:pea-comments@dhs.gov).

Sincerely,

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Michael Grisham  
FEMA Environmental Liaison Officer  
FEMA/State Transitional Recovery Officer  
220 Popps Ferry Road, Building A South  
Biloxi, MS 39531



**FEMA**

May 9, 2008

Dr. Susan Rees  
USACE Mobile District, Planning Division  
109 Saint Joseph Street  
Mobile, Al 36602

RE: Consultation request for proposed Programmatic Environmental Assessment for the Placement of Permanent Disaster Relief Residential Housing

Dear Dr. Rees:

Recognizing the extensive and complex housing challenges facing victims and communities as a result of Hurricane Katrina and acknowledging the limitations on Federal Emergency Management Agency's (FEMA) ordinary statutory authority to provide non-temporary housing solutions, Congress appropriated funds to the Department of Homeland Security to support alternative housing pilot programs (Emergency Supplemental Appropriations Act, 2006, P.L. 109-234). The Alternative Housing Pilot Program (AHPP) represents a one-time exception to FEMA's existing authority under the Stafford Act, which legally binds FEMA to a temporary housing mission reliant primarily on travel trailers and manufactured homes, by providing an opportunity to explore, implement, and evaluate innovative approaches to housing solutions, and to address ongoing housing challenges created by the 2005 hurricane season in the states of the Gulf Coast region, including the State of Mississippi.

The Mississippi Emergency Management Agency (MEMA) applied for FEMA funding under the AHPP to provide both temporary and permanent housing solutions for eligible families displaced from Katrina. Since the inception of AHPP in Mississippi, MEMA provided for approximately 2,000 temporary Mississippi Cottages. MEMA proposes to provide permanent housing within George, Hancock, Harrison, Jackson, Pearl River and Stone Counties.

The National Environmental Policy Act of 1969 (NEPA) and its implementing regulations 40 C.F.R. Part 1500 and 44 C.F.R. Part 10 direct FEMA to take into consideration the environmental consequences of proposed actions during the decision-making process. FEMA must comply with NEPA before making federal funds available for all FEMA programs.

FEMA determined that the recurring proposed actions that require an Environmental Assessment (EA) can be grouped by the nature and location of the proposed actions.

These actions can be evaluated through a Programmatic Environmental Assessment (PEA) for compliance with NEPA and its implementing regulations without developing an EA for every action. FEMA determined that a PEA can be prepared to analyze the potential environmental impacts of MEMA's proposed permanent housing phase within the six above mentioned counties. Gulf South Research Corporation (GSRC) has been retained by FEMA to prepare a PEA for the AHPP permanent installation projects.

FEMA will use this PEA to determine the level of environmental documentation required under NEPA for any proposed permanent housing action in Mississippi, given the available site-specific information. If the alternatives, levels of analysis, and site-specific information of an action proposed for FEMA funding are fully and accurately described in this PEA, FEMA will prepare a memorandum documenting this determination. This memorandum would state that FEMA has reviewed the proposed action, alternatives, and potential direct, indirect and cumulative impacts and found them to be accurately described by this PEA and its associated Finding of No Significant Impact (FONSI). Should FEMA determine that an action has the potential to affect a resource, a tiered Supplemental Environmental Assessment (SEA) would be prepared. Should an action fall outside the scenarios illustrated below, FEMA would prepare an EA for that proposed action.

At this time, FEMA requests that your agency review the five scenarios presented below. Please provide comments and any available information under your agency's jurisdiction to aid in the preparation and expedited approval of this PEA. Any concerns raised will be addressed in the PEA, and formal consultation will allow for your review of the final document.

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Please provide FEMA with a point of contact within your agency so that we may address any concerns or comments you may have relating to any of the proposed scenarios. We would appreciate receiving your concerns/comments as soon as possible. If we have not

Susan Rees  
May 9, 2008  
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Sincerely,

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Michael Grisham  
Environmental Liaison Officer  
FEMA-1604-DR-MS  
TRO- Biloxi, MS

August 19, 2008



Susan Rees  
United States Army Corps of Engineers  
Mobile District, Planning Division  
109 Saint Joseph Street  
Mobile, AL 36602

RE: Draft Programmatic Environmental Assessment for the Placement of Permanent Disaster Relief Residential Housing

Dear Dr. Rees:

As part of the National Environmental Policy Act of 1969 (NEPA) and its implementing regulations 40 Code of Federal Regulations (CFR) Part 1500 and 44 CFR Part 10, the Federal Emergency Management Agency (FEMA) has prepared a Programmatic Environmental Assessment (PEA) to evaluate the environmental consequences of providing permanent housing to displaced residents of Mississippi by the Alternative Housing Pilot Program (AHPP). Through FEMA funding, Mississippi Emergency Management Agency (MEMA) proposes to provide permanent housing within George, Hancock, Harrison, Jackson, Pearl River and Stone Counties. This draft PEA analyzes seven scenarios or alternatives which would provide AHPP permanent installation projects throughout the six affected counties within the State of Mississippi.

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Michael Grisham  
FEMA Environmental Liaison Officer  
FEMA/State Transitional Recovery Officer  
220 Popps Ferry Road, Building A South  
Biloxi, MS 39531



**FEMA**

May 9, 2008

Mr. Don Underwood  
MS Soil and Water Conservation Commission  
P.O. Box 23005  
Jackson, MS 39225-3005

RE: Consultation request for proposed Programmatic Environmental Assessment for the Placement of Permanent Disaster Relief Residential Housing

Dear Mr. Underwood:

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Don Underwood  
May 9, 2008  
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Michael Grisham  
Environmental Liaison Officer  
FEMA-1604-DR-MS  
TRO- Biloxi, MS

August 19, 2008



Don Underwood  
Mississippi Soil and Water Conservation Commission  
P.O. Box 23005  
Jackson, MS 39225-3005

RE: Draft Programmatic Environmental Assessment for the Placement of Permanent Disaster Relief Residential Housing

Dear Mr. Underwood:

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Michael Grisham  
FEMA Environmental Liaison Officer  
FEMA/State Transitional Recovery Officer  
220 Popps Ferry Road, Building A South  
Biloxi, MS 39531

August 19, 2008



Mark Creech  
Mississippi Regional Housing Authority  
Director of Assisted Housing, MRHA No. VIII  
2909 26th Avenue  
Gulfport, MS 39501

RE: Draft Programmatic Environmental Assessment for the Placement of Permanent Disaster Relief Residential Housing

Dear Mr. Creech:

As part of the National Environmental Policy Act of 1969 (NEPA) and its implementing regulations 40 Code of Federal Regulations (CFR) Part 1500 and 44 CFR Part 10, the Federal Emergency Management Agency (FEMA) has prepared a Programmatic Environmental Assessment (PEA) to evaluate the environmental consequences of providing permanent housing to displaced residents of Mississippi by the Alternative Housing Pilot Program (AHPP). Through FEMA funding, Mississippi Emergency Management Agency (MEMA) proposes to provide permanent housing within George, Hancock, Harrison, Jackson, Pearl River and Stone Counties. This draft PEA analyzes seven scenarios or alternatives which would provide AHPP permanent installation projects throughout the six affected counties within the State of Mississippi.

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Michael Grisham  
FEMA Environmental Liaison Officer  
FEMA/State Transitional Recovery Officer  
220 Popps Ferry Road, Building A South  
Biloxi, MS 39531

August 19, 2008



Keith Campbell  
Mississippi Emergency Management Agency  
AHPP  
2700 24th Avenue  
Gulfport, MS 39501

RE: Draft Programmatic Environmental Assessment for the Placement of Permanent Disaster Relief Residential Housing

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FEMA/State Transitional Recovery Officer  
220 Popps Ferry Road, Building A South  
Biloxi, MS 39531

August 19, 2008



Mike Womack  
Mississippi Emergency Management Agency  
Executive Director  
No 1 MEMA Drive  
Pearl, MS 39208

RE: Draft Programmatic Environmental Assessment for the Placement of Permanent Disaster Relief Residential Housing

Dear Mr. Womack:

As part of the National Environmental Policy Act of 1969 (NEPA) and its implementing regulations 40 Code of Federal Regulations (CFR) Part 1500 and 44 CFR Part 10, the Federal Emergency Management Agency (FEMA) has prepared a Programmatic Environmental Assessment (PEA) to evaluate the environmental consequences of providing permanent housing to displaced residents of Mississippi by the Alternative Housing Pilot Program (AHPP). Through FEMA funding, Mississippi Emergency Management Agency (MEMA) proposes to provide permanent housing within George, Hancock, Harrison, Jackson, Pearl River and Stone Counties. This draft PEA analyzes seven scenarios or alternatives which would provide AHPP permanent installation projects throughout the six affected counties within the State of Mississippi.

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Sincerely,

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Michael Grisham  
FEMA Environmental Liaison Officer  
FEMA/State Transitional Recovery Officer  
220 Popps Ferry Road, Building A South  
Biloxi, MS 39531

August 19, 2008



Janet Riddell  
Clearinghouse Officer  
Dept. of Finance and Administration  
1301 Woolfolk Building, Suite E  
501 North West Street  
Jackson, MS 39201

RE: Draft Programmatic Environmental Assessment for the Placement of Permanent Disaster Relief Residential Housing

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Michael Grisham  
FEMA Environmental Liaison Officer  
FEMA/State Transitional Recovery Officer  
220 Popps Ferry Road, Building A South  
Biloxi, MS 39531

August 19, 2008



Librarian  
Bay St. Louis-Hancock County Library  
312 Highway 90  
Bay St. Louis, MS 39520

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Michael Grisham  
FEMA Environmental Liaison Officer  
FEMA/State Transitional Recovery Officer  
220 Popps Ferry Road, Building A South  
Biloxi, MS 39531

August 19, 2008



Librarian  
Margaret S. Sherry Memorial Library  
2141 Popp's Ferry Road  
Biloxi, MS 39532-4251

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Michael Grisham  
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FEMA/State Transitional Recovery Officer  
220 Popps Ferry Road, Building A South  
Biloxi, MS 39531

August 19, 2008



Librarian  
Pascagoula Public Library  
3214 Pascagoula Street  
Pascagoula, MS 39567

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Biloxi, MS 39531

August 19, 2008



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Margaret Reed Crosby Memorial Library  
900 Goodyear Boulevard  
Picayune, MS 39466

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August 19, 2008



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Lucedale-George County Public Library  
507 Oak Street  
Lucedale, MS 39452

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Stone County Library  
242 Second Street  
Wiggins, MS 39577

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