

U.S. Department of Homeland Security
Louisiana Recovery Office
1 Seine Court
New Orleans, Louisiana 70114



FEMA

**DRAFT FINDING OF NO SIGNIFICANT IMPACT
LAFITTE SENIOR HOUSING PROJECT
CITY OF NEW ORLEANS, ORLEANS PARISH, LOUISIANA
*FEMA-1603-DR-LA***

Introduction

As a result of damages from Hurricane Katrina on August 29, 2005, the Federal Emergency Management Agency (FEMA) was authorized under Presidential disaster declaration (FEMA-1603-DR-LA) to provide Federal assistance to designated disaster areas in Louisiana. The Robert T. Stafford Disaster Relief and Emergency Assistance Act (PL 93288) Section 406 authorizes FEMA's Public Assistance (PA) Program to provide financial and other forms of assistance to State and local governments to support response, recovery, and mitigation efforts following Presidentially declared disasters.

In accordance with 44 CFR Part 10, FEMA regulations to implement the National Environmental Policy Act (NEPA), an Environmental Assessment (EA) was prepared. The purpose of the EA was to analyze the potential environmental impacts associated with the construction of a new Lafitte Senior Housing facility, and to determine whether to prepare an Environmental Impact Statement (EIS) or Finding of No Significant Impact (FONSI).

The Housing Authority of New Orleans (the Applicant) proposes to construct the Lafitte Senior Housing project, a 100-apartment unit, 91,722-square foot, 3-story senior living facility on a 27.2-acre site near the New Orleans central business district bounded by Lafitte Street, Orleans Avenue, N. Claiborne Avenue, and N. Rochablave Street. The new development will replace on the same site the former Lafitte conventional public housing development damaged by Hurricane Katrina in September, 2005 and demolished by the Authority in November, 2009. The alternatives considered include 1) No Action 2) Reconstruction at the original location and 3) Reconstruction at the alternate location.

Proposed Action

The proposed action includes the construction of a new senior housing facility on the same site as the previous Lafitte housing development, identified above.

Findings

FEMA has evaluated the proposed project for significant adverse impacts to geology, soils, water resources (groundwater, wetlands and floodplains), coastal resources,

biological resources, cultural resources, air quality, noise, traffic, safety, hazardous materials and environmental justice. During the construction period, short-term impacts to soils, water quality, transportation, air quality, and noise are anticipated. All short-term impacts require conditions to minimize and mitigate impacts to the proposed project site and surrounding areas.

Conditions

The following conditions must be met as part of the implementation of the project. Failure to comply with these conditions may jeopardize federal funds:

- This project is located within the Louisiana Coastal Management Zone. The Applicant must check with Louisiana Department of Natural Resources for permitting or other authorization requirements. Projects may be coordinated by contacting LDNR at 1-800-267-4019
- If required by LDEQ, the Applicant shall require its contractor to prepare, certify, and implement a Construction Storm Water Pollution Prevention Plan to prevent sediment and construction material transport from the project site (A Louisiana Pollution Discharge Elimination System (LAPDES) Permit will be required in accordance with The Clean Water Act and The Louisiana Clean Water Code). All coordination pertaining to these activities should be documented and copies forwarded to the State and FEMA as part of the permanent project files.
- The Applicant should ensure that best management practices are taken to minimize the generation of fugitive dust during construction activities.
- Unusable equipment, debris and material shall be disposed of in an approved manner and location. Applicant is responsible to ensure potential hazardous materials, if any, shall be removed, handled, transported and disposed of in accordance with local, State and Federal compliance requirements.
- As of the release date of DFIRMs, unobligated FEMA Public Assistance grants for new construction and substantial improvements are to be built in accordance with a minimum base flood elevation (BFE) as established by the preliminary DFIRM. Orleans Parish DFIRMs were issued November 2008. Local ordinances based on ABFE maps may require a more stringent elevation requirement. New construction must be compliant with current codes and standards. The applicant is required to coordinate with the local floodplain administrator regarding floodplain permit(s) prior to the start of any activities. In compliance with Executive Order 11988, an 8-step process, showing considered alternatives, was completed and is attached or on file. As per 44 CFR 9.11 (d) (9), mitigation or minimization standards must be applied where possible. The replacement of building contents, materials and equipment should be, where possible, wet or dry-proofed, elevated, or relocated to or above the community established base flood elevation. Hazardous materials need to be elevated above the 0.2 % annual chance (500-year) flood elevation.

- If during the course of work, archaeological artifacts (prehistoric or historic) or human remains are discovered, the applicant shall stop work in the vicinity of the discovery and take all reasonable measures to avoid or minimize harm to the finds. The applicant shall inform their Public Assistance (PA) contacts at FEMA, who will in turn contact FEMA Historic Preservation (HP) staff. The applicant will not proceed with work until FEMA HP completes consultation with the SHPO. In addition, if unmarked graves are present, compliance with the Louisiana Unmarked Human Burial Sites Preservation Act (R.S. 8:671 et seq.) is required. The applicant shall notify the law enforcement agency of the jurisdiction where the remains are located within twenty-four hours of the discovery. The applicant shall also notify FEMA and the Louisiana Division of Archaeology at 225-342-8170 within seventy-two hours of the discovery.
- The City of New Orleans and its contractors should ensure all project activities are conducted in a safe manner and in compliance with all state and federal occupational safety regulations, including OSHA, to protect workers and the general public.
- If hazardous constituents are encountered, appropriate measures for the proper assessment, remediation and management of the contamination should be initiated in accordance with applicable federal, state and local regulations.

Conclusion

The results of these evaluations, as well as consultations and input from other federal and state agencies, are presented in the EA. The Section 106 review process will need to be completed, including public participation, upon finalization of this EA and FONSI. Based on the information analyzed, FEMA has determined that the implementation of the proposed action would not result in significant adverse impacts to the quality of the natural and human environment. In addition, the proposed project does not appear to have the potential for significant cumulative effects when combined with past, present and reasonably foreseeable future actions. As a result of this FONSI, an EIS will not be prepared (per 44 CFR Part 10) and the proposed project as described in the EA may proceed once finalized.

Public Review and Comment

The EA can be viewed and downloaded from FEMA's website at www.fema.gov/plan/ehp/envdocuments/ea-region6.shtm. The EA was also made available for public review at the Mid-City Branch of the New Orleans Public Library at 3700 Orleans Avenue (in the American Can building), New Orleans, LA. A legal notice was posted in the local newspaper on 9/29/09, 9/30/09, and 10/03/09. No substantive comments were received; therefore the Draft EA will become final and the initial Public Notice will also serve as the final Public Notice.

Approval:

Katherine Zeringue, Environmental Liaison Officer Date
Louisiana Recovery Office
FEMA-1603/1607-DR-LA

Joe Threat, Director Date
Louisiana Recovery Office
FEMA-1603/1607-DR-LA