

Draft Environmental Assessment

O'Neal Group Housing Site

FEMA-4277-DR-LA

East Baton Rouge Parish, Louisiana

October 2016



FEMA

U.S. Department of Homeland Security
Federal Emergency Management Agency
Region 6
800 North Loop 288
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ACRONYMS AND ABBREVIATIONS

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

1. Introduction

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

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

2. Purpose and Need

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

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

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

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

Most of this demand will be met by repairing and improving existing multi-family housing to be utilized as temporary housing, placing manufactured housing units (MHU) on eligible private sites, or on available pads leased in a commercial park. However, once these options are exhausted, FEMA estimates many applicants still will remain in need of direct housing, thus supporting the need to develop a temporary group-housing site, hereinafter “group site.”

3. Environmental Review Process

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

The scope of FEMA’s environmental review includes evaluating project alternatives, characterizing the affected environment, identifying potential environmental impacts, and outlining ways to reduce or minimize adverse effects. This Draft EA examines the site-specific environmental impacts associated with building a proposed FEMA group-housing site on private or publicly owned land to be leased by the General Service Administration (GSA) for this purpose.

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

4. Site Selection Process and Alternatives

NEPA requires investigation and evaluation of reasonable project alternatives as part of the project environmental review process. At a minimum, FEMA’s NEPA implementing regulations require the No Action and Proposed Action be evaluated. Concurrent to the Proposed Action, other federally assisted housing options are being utilized first. These options include minor home repairs, rental assistance, and installing a manufactured housing unit on a private site or in an existing commercial site but these options are rapidly depleting due to the high demand. Therefore, a remaining alternative is to build an emergency, temporary group-housing site when the above options do not satisfy the demand.

In order to expedite the group housing site selection process, FEMA is working closely with local officials and the United States Army Corps of Engineers (USACE) to identify potential sites, followed by a site reconnaissance and research to determine site suitability. Important factors considered in choosing a site include: demand for temporary housing in that area, group acceptance, proximity of group services/amenities (schools, healthcare facilities, public transportation, etc.), engineering and construction feasibility, access to utilities, land use compatibilities, property owner terms, costs to develop and maintain the site, and environmental/cultural resource sensitivities. FEMA will continue to evaluate alternative sites in East Baton Rouge Parish. Although various alternatives have been and continue to be identified, the amount of needed housing has limited this Draft EA to analysis of one suitable site alternative. The O’Neal Group Site was selected for further detailed analysis because it meets the basic site feasibility and selection criteria.

Alternative 1 – No Action Alternative

Under the No Action alternative, FEMA would not develop a temporary group housing site at this location. Displaced residents would continue to stay with relatives/friends, in hotels, or other temporary locations until they resolve their own long-term housing needs. This alternative may jeopardize public health, safety, and well-being and thus it would not address the project’s purpose and need.

Alternative 2 – Develop the O’Neal Group Site with MHU (Proposed Action)

The Proposed Action would provide temporary housing for eligible displaced residents by August 2016 floods in southeastern Louisiana. Eligible displaced residents would be temporarily relocated to the site with an expected occupancy up to 18 months (which includes a site deactivation period) while they resolve their permanent housing solution needs. This alternative would assist in fulfilling FEMA’s mandate under the IHP to expeditiously provide temporary housing for eligible displaced residents. This alternative would also address the proposed project’s purpose and need.

4.1 Project Location and Site Description

The proposed site (Figure 1) is located along O’Neal Lane, City of Baton Rouge, East Baton Rouge Parish, Louisiana 70819 (30.42993, -91.00716). The O’Neal Group Site consists of approximately 6 acres located east of O’Neal Lane, across from O’Neal Lane Self Storage, and adjacent to several small housing developments. Access to the site is via O’Neal Lane (State Road 3245), a four lane heavily traveled arterial road. A vicinity map and an aerial photo of the proposed site is included as Figures 1 and 2, respectively. The project site is currently an open field, with a cleared, central gravel pad. The site was cleared of trees and other woody vegetation prior to 2009, and the soil was graded. The site is now a mostly flat, undeveloped parcel located in Flood Zone X (Area with Reduced Flood Risk due to Levee). The soils are hydric in nature, but no wetlands are present. Gravel backfill has been laid in the past. A siltation fence surrounds the property. A one lane, gravel turn-in off O’Neal Lane provides access to the site. Approximately 600 – 700 cubic yards of soil have been stockpiled on the north side of the property. A shallow ditch in the middle of the site provides drainage to the south. Some site

regrading would be required to promote positive drainage away from the property center. Typical site conditions are depicted in photos at Figures 4 thru 7. Stockpiled material is shown in Figure 5. The property is bordered by a veterinary clinic and church to the south, residential to the east, commercial plaza to the north, and O'Neal Lane to the west. Wal-Mart, other shops, restaurants, schools, childcare, and medical services are conveniently located to the property.

4.2 Proposed Project Description

The proposed action would utilize a design for the construction of 32 manufactured home pads. These would be used for the placement of MHUs to house displaced families. Development of the site would require the installation of utilities on the site, asphalt for the roads and handicap parking lot and crushed rocks for trailer pads and residents parking. A proposed MHU layout for O'Neal Group Site is at Figure 3.

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

- Site preparation would include clearing, grading, and removal of woody vegetation and debris.
- Infrastructure for water, sewer, and electrical services exist off of O'Neal Lane but would have to be extended onto the site.
- New lines and fire hydrants would be installed on the property for all units.
- Storm water drainage would be developed within the site as well.
- Uniform Federal Accessibility Standard (UFAS) site features include 20% of the units meeting UFAS, and 100% of onsite essential services/facilities (such as mailbox kiosk) would be UFAS compatible.
- Erosion control would be established during the construction period and a perimeter fence would be constructed around the project site.

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

5. Affected Environment and Potential Impacts

This section is organized by individual resources. It includes a description of the existing conditions at the project area and provides an analysis of potential environmental impacts for each alternative. Impacts to the following resources as a result of the Proposed Action were found to be discountable and are not evaluated further in this Draft EA: geology, soils and seismicity, air quality, climate change, coastal zones, wildlife and fish, noise, traffic, public service and utilities, and public health and safety. Where potential impacts exist, conditions or

mitigation measures to offset these impacts are detailed. Table 1 summarizes the results of the environmental review process. No safety issues were identified on the project site.

5.1 Water Resources

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

5.1.1 Water Quality

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

Alternative 1- No Action Alternative

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

Alternative 2 - Develop the Develop the O’Neal Group Site with MHU (Proposed Action)

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

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

5.1.2 Wetlands

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

Alternative 1- No Action Alternative

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

Alternative 2 - Develop the Develop the O’Neal Group Site with MHU (Proposed Action)

Under the Proposed Action alternative, based on the United States Fish and Wildlife Services (USFWS) National Wetlands Inventory (NWI) map accessed on October 18, 2016, available online at (<https://fws.gov/wetlands/>), no wetlands were identified on the project site. Field observations confirmed that no wetlands exist on the site. Therefore, the proposed action would not affect any wetlands.

5.1.3 Floodplains

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

Alternative 1- No Action Alternative

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

Alternative 2 - Develop the Develop the O’Neal Group Site with MHU (Proposed Action)

Based on the FEMA Flood Insurance Rate Map (FIRM) panel number 22033C0270E dated 05/02/2008, accessed on October 20, 2016, at (<https://msc.fema.gov/portal>), the proposed project is located in Zone X with reduced flood risk due to levee. Thus, this alternative would not adversely affect or be affected by floodplain values.

5.2 Threatened and Endangered Species and Critical Habitat

Section 7 of the Endangered Species Act (ESA) of 1973 directs federal agencies to utilize their authorities in furtherance of the purposes of the Act by carrying out programs for the conservation of listed species or designated critical habitats. The USFWS is the agency that regulates compliance with the ESA. Furthermore, migratory birds are protected by the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act. Any activity that results in the take of migratory birds or eagles is prohibited unless authorized by the USFWS. There are no provisions for allowing the take of migratory birds that are unintentionally killed or injured. Any person or organization who plans or conducts activities that may result in the take of migratory brds is responsible for complying with the appropriate regulations and implementing appropriate conservation measures.

Alternative 1- No Action Alternative

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

Alternative 2 - Develop the Develop the O’Neal Group Site with MHU (Proposed Action)

The USFWS's Information for Planning and Conservation website at <https://ecos.fws.gov/ipac/> accessed on October 18, 2016 was reviewed for a list of threatened and endangered species in the project area. While there are four listed species and 25 migratory birds that occur in the East Baton Rouge Parish, the proposed site does not contain suitable habitat for any of these listed species.

A search of the USFWS Critical Habitat online mapper accessed on October 18, 2016 at <http://ecos.fws.gov/ecp/> resulted in a finding of no designated critical habitats in the project area.

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

5.3 Cultural Resources

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

Alternative 1- No Action Alternative

Site development activities by the owner have been conducted on all of the proposed site. During this time, no evidence of cultural resources were reported. Under the No Action alternative, there would be no short- or long-term impacts to cultural resources.

Alternative 2 - Develop the Develop the O'Neal Group Site with MHU (Proposed Action)

FEMA has defined the Area of Potential Effect (APE) for the proposed undertaking as the maximum horizontal and vertical limits of excavation and construction, as well as all areas of ground disturbance, clearing and grubbing, staging, or equipment operation. Based on a review of the Louisiana Cultural Resources Mapper and site reconnaissance, FEMA has determined that the APE does not include any above or below ground historic properties listed in or eligible for the National Register of Historic Places (NRHP). FEMA has determined that there would be no historic properties affected as a result of the Proposed Action. The coordination letter with the State Historic Preservation Office (SHPO) and their concurrence concerning this determination can be found at Attachments 1 and 2, respectively.

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

5.4. Socioeconomic Resources

The project site is located in the East Baton Rouge Parish, Louisiana. According to the United States Census Bureau (USCB), the population as of July 15, 2015 was 446,753 with a total of

189,353 housing units. The median household income was estimated at approximately \$48,535 (based on 2010 -2014 American Survey 5-year Estimates). According to the 2010 -2014 American Survey 5-year Estimates, approximately 18.4% of population lives below poverty levels.

5.4.1 Environmental Justice

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

Alternative 1- No Action Alternative

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

Alternative 2 - Develop the Develop the O’Neal Group Site with MHU (Proposed Action)

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

The demographic makeup of the group site residents is expected to be similar to the community as a whole. Further, the availability of temporary housing would result in a positive impact to displaced individuals, regardless of whether they are minority and/or low income. Therefore, the proposed action would not pose disproportionately high and adverse public health or environmental effects on minority and low-income populations.

With the establishment of the site, up to approximately 128 displaced residents could be temporarily relocated to the O’Neal Group Site. The potential site residents would be from the Parish areas which have been impacted by the flooding. The local community is aware of this action and may experience a slight localized increase in the need for public services, such as schools, fire and police services, childcare, and medical services. Therefore, the overall demand for public and commercial services is not expected to be greater than the pre-disaster demand and potential impacts are expected to be minimal.

5.4.2 Hazardous Materials

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

Review of the EDR Radius Map Report with GeoCheck (EDR) on September 23, 2016 at (<http://edrnet.com/prods/edr-radius>) identified no sites at higher elevation than the target property with potential environmental concerns. No potential hazardous materials problems were observed on the site.

A review of the EPA NEPA Assist accessed on September 28, 2016 (<https://www.epa.gov/nepa/nepaassist>) indicated that there are no RCRA hazardous waste sites, no Toxic Substances releases, no Brownfield sites, or Superfund sites on the proposed project location. Seven permitted water discharges along the O'Neil Lane have been identified as follows: one North about 0.12 miles from the proposed site, four South within a 0.2 miles of the proposed site, and two discharges in front of the property and across O'Neil Lane. These water discharges along O'Neil Lane would not pose a threat to human health and the environment at the proposed site. Furthermore, there are three RCRA facilities regulated by LDEQ within a 0.3 mile radius of the proposed group site. Two are hazardous waste Conditionally Exempt Small Quantity Generators. Facilities under this category generate less than 100 kg/month of hazardous waste, less than 1 kg/month of acute hazardous waste or less than 100 kg/month of acute spill residue or soil. The third facility is a large quantity generator. Facilities under this category generate greater than 1,000 kg/month of hazardous waste, greater than 1 kg/month of acute hazardous waste, or greater than 100 kg/month of acute spill residue or soil. The three RCRA facilities would not pose a threat to human health and the environment at the proposed site.

Alternative 1- No Action Alternative

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

Alternative 2 - Develop the Develop the O'Neal Group Site with MHU (Proposed Action)

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

6. Cumulative Impacts

Cumulative impacts are defined as environmental effects that are greater in magnitude, extent, or duration than the direct and indirect effects of the proposed FEMA-associated action when

combined with the effects of other current and future actions, regardless of the proponent. Given the establishment of the O’Neal Group Site would be temporary, long-term (up to 18 months) cumulative effects to the area surrounding the site as a result of site development and occupancy are not anticipated.

7. Public Involvement

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

Additionally, the Draft EA will be made available for review at the Main Library of the East Baton Rouge Public Library, located at 7711 Goodwood Blvd, Baton Rouge, LA 70806. Due to the emergency nature of this action, the public comment period will be limited to 3 days. FEMA will consider and respond to all public comments in the Final EA. If no substantive comments are received, the Draft EA will become final and a FONSI will be issued for the project.

8. Mitigation

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

1. Appropriate BMPs will be implemented during site development to minimize sediment migration from the site into nearby water bodies. Surface runoff will be controlled by using siltation controls such as silt fencing around the construction site to minimize erosion of materials into any wetlands and/or waterways. Any disturbed soil will be protected with seed or sod after construction in order to decrease the amount of soil eroded by rainfall and runoff. Any fill stored on site will be appropriately covered to prevent erosion.
2. In order to control storm water runoff, the contractor will be required to design drainage features so that flows will not cause nuisance flooding during heavy rainfall events. The drainage system will be required to meet local and parish requirements.
3. The contractor will monitor ground-disturbing activities during construction. If any potential archeological resources are discovered, the contractor will immediately cease construction in that area and notify the Louisiana Governor's Office of Homeland Security and Emergency Preparedness and FEMA.
4. Unusable equipment, debris and material will be disposed of prior to occupancy in an approved manner and location. In the event significant items (or evidence thereof) are discovered during implementation of the project, the contractor will handle, manage, and dispose of petroleum products, hazardous materials, and toxic waste in accordance to the requirements and to the satisfaction of the governing local, state, and federal agencies.

5. To minimize dust, site soils will be wetted during site preparation activities, and seeded following construction.
6. Construction activities with elevated noise levels will be limited from 7:00 A.M. to 7:00 P.M. unless otherwise approved by the Parish. Equipment and machinery used during construction must meet all local, State, and federal noise regulations.
7. The contractor will post appropriate signage and fencing to minimize potential adverse public safety concerns. Appropriate signage and barriers will be in place prior to construction activities in order to alert pedestrians and motorists of project activities and traffic pattern changes.
8. Once the temporary housing need has ended, the site will be seeded and restored to previous conditions to the extent practical or in accordance with site lease terms.

9. List of Preparers

EA Preparers: Thomas Lightcap, NEPA Specialist, USACE; Kenneth R. Sims, NEPA Team Lead, USACE

Field Team: John Robinson, Environmental Specialist, USACE; Richard Beatty, Environmental Specialist, FEMA

Reviewers: Kevin Jaynes, Regional Environmental Officer, FEMA; Adam Borden, Deputy Environmental Advisor, FEMA

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

Resource Area	No Action Alternative	Alternative 2 Proposed Action: Develop the O’Neal Group Site with MHU	Mitigation	Agency Coordination/ Permits
Water Quality	No change from current conditions.	Appropriate BMPs would be implemented during site development to minimize sediment migration from the site into any water bodies. Any disturbed soil would be protected with seed or sod after construction in order to decrease the amount of soil eroded by rainfall and runoff. If fill is stored on site, the contractor would appropriately cover it to prevent erosion.	Appropriate BMPs will be implemented during site development to minimize sediment migration from the site into nearby water bodies. Surface runoff will be controlled by using siltation controls such as silt fencing around the construction site to minimize erosion of materials into any wetlands and/or waterways. Any disturbed soil will be protected with seed or sod after construction in order to decrease the amount of soil eroded by rainfall and runoff. Any fill stored on site will be appropriately covered to prevent erosion.	Applicant must coordinate with the LDEQ and obtain required permits prior to initiating work. All coordination pertaining to these activities and applicant compliance with any conditions will be documented and copies forwarded to the state and FEMA for inclusion in the permanent project files.
Wetlands	No change from current conditions.	No wetland identified at site location.	None	None
Floodplains	No change from current conditions.	Not in floodplain	None	None
Threatened and Endangered Species and Critical Habitat	No change from current conditions.	No Threatened and Endangered Species and Critical Habitat on the Proposed Site.	None	None

Resource Area	No Action Alternative	Alternative 2 Proposed Action: Develop the O'Neal Group Site with MHU	Mitigation	Agency Coordination/ Permits
Cultural Resources	No change from current conditions.	FEMA has determined that there would be no historical properties affected as a result of the Proposed Action. The SHPO concurred with this determination in correspondence dated September 26, 2016.	The contractor will monitor ground-disturbing activities and if any potential archeological resources are discovered, will immediately cease construction in that area and notify the Louisiana Governor's Office of Homeland Security and Emergency Preparedness and FEMA.	FEMA has consulted with SHPO and obtained concurrence on October September 26, 2016
Environmental Justice	No change from current conditions.	The Proposed Action would not pose disproportionately high and adverse public health or environmental effects on minority and low-income populations.	Construction activities with elevated noise levels will be limited from 7:00 A.M. to 7:00 P.M. unless otherwise approved by the Parish. Equipment and machinery used during construction must meet all local, State, and federal noise regulations.	None
Hazardous Materials	No change from current conditions.	Under the Proposed Action, there are no anticipated impacts from hazardous materials and hazardous substances.	Unusable equipment, debris, and material will be disposed of prior to occupancy in an approved manner and location. In the event significant items (or evidence thereof) are discovered during implementation of the project, the contractor will handle, manage, and dispose of petroleum products, hazardous materials, and toxic waste in accordance to the requirements and to the satisfaction of the governing local, state, and federal agencies.	None

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



September 23, 2016

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

Dear Mr. Boggan,

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

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

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

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

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

Project Description

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

The East Baton Rouge O’Neal location is an approximately 5.5 acre property located east of O’Neal Lane across from O’Neal Lane Self Storage, and adjacent to several small housing developments. The location is currently an open field, with a cleared, central gravel pad. This location was cleared of vegetation prior to 2009, and was likely partially disturbed as a result of the removal of vegetation.

Area of Potential Effect

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

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

Location	Northwest Corner	Northeast Corner	Southeast Corner	Southwest Corner
EBR O’Neal	30.43040, -91.00733	30.430404, -91.0050	30.42949, -91.00503	30.42947, -91.00734

Identification of Historic Properties

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

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

Findings of Effect

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

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

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

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

Sincerely,

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

Attachment 2 - Concurrence Letter from the SHPO, 9/26/2016 (page 1 only)

No known historic properties will be affected by this undertaking. Therefore, our office has no objection to the implementation of this project. This effect determination could change should new information come to our attention.



Phil Boggan
State Historic Preservation Officer

Date

09/26/2016

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



FEMA

September 23, 2016

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

Dear Mr. Boggan,

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

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Figure 1 - Map Showing Major Roads and Streets near Proposed O'Neal Group Site (Latitude 30.42993, Longitude -91.00716)

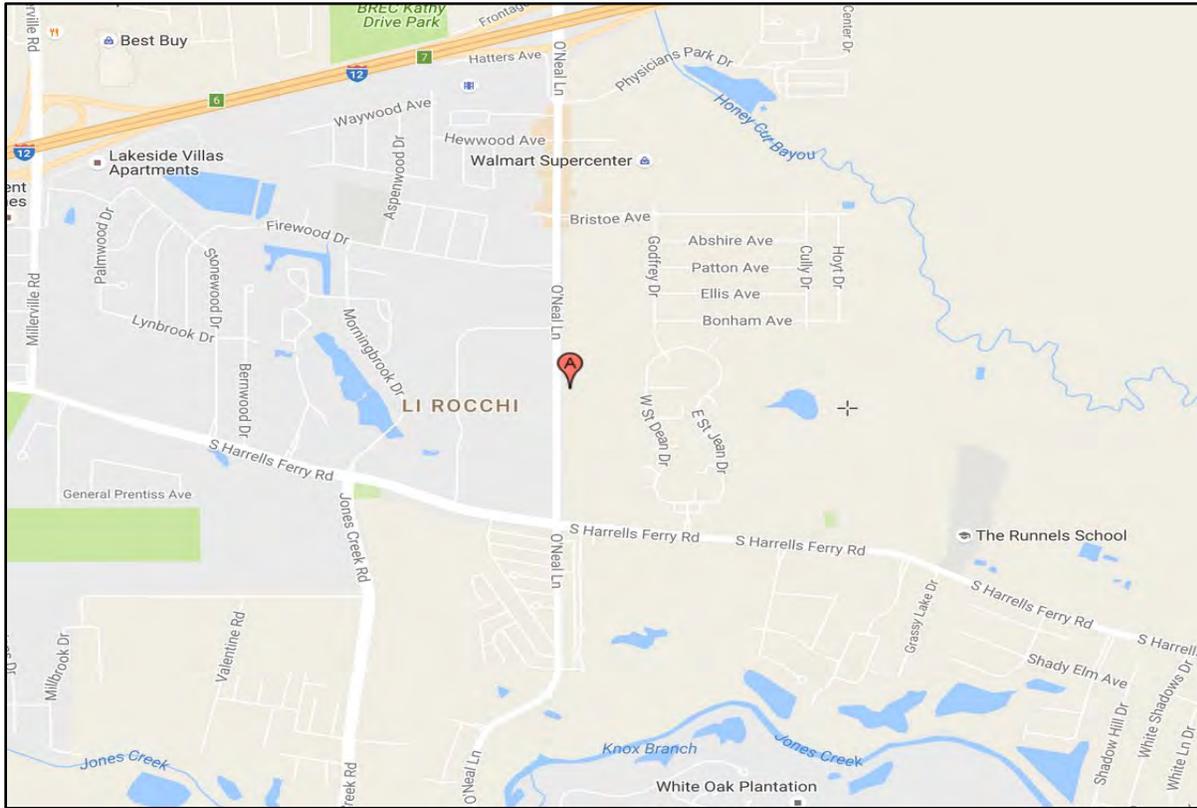


Figure 2 – 2016 Aerial Photo of Proposed O’Neal Group Site and Vicinity



Figure 3 – Typical MHU Layout on Proposed O’Neal Group Site

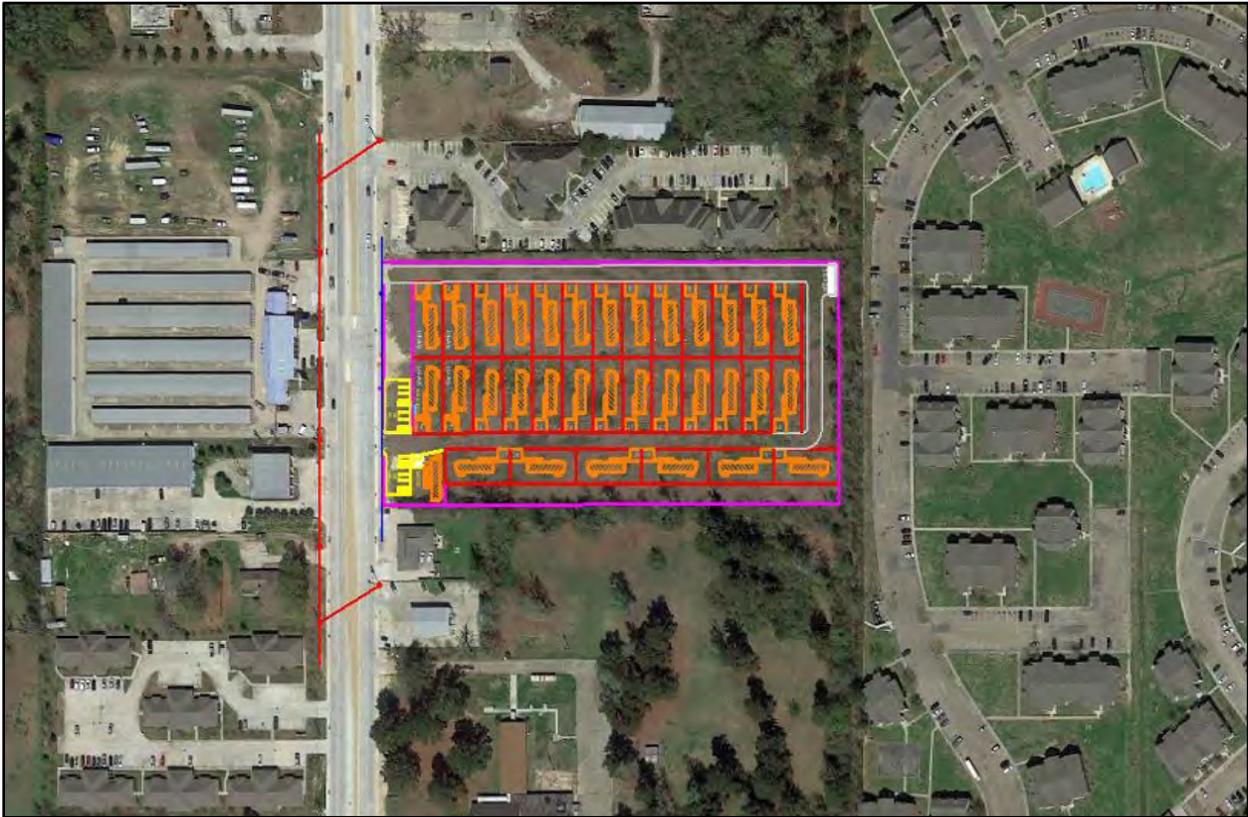


Figure 4 - Existing Conditions on Proposed O'Neal Group Site



Figure 5 - Existing Conditions on Proposed O'Neal Group Site



Figure 6 - Existing Conditions on Proposed O'Neal Group Site



Figure 7 - Existing Conditions on Proposed O'Neal Group Site

