

Draft Environmental Assessment

EBR 13 - South Choctaw Drive Group Housing Site

FEMA-4277-DR-LA

East Baton Rouge Parish, Louisiana

November 2016



FEMA

**U.S. Department of Homeland Security
Federal Emergency Management Agency**
Region 6
800 North Loop 288
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Table of Contents

1. Introduction.....	1
2. Purpose and Need	1
3. Environmental Review Process	2
4. Site Selection Process and Alternatives.....	2
4.1 Project Location and Site Description	4
4.2 Proposed Project Description.....	4
5. Affected Environment and Potential Impacts.....	5
5.1 Water Resources	5
5.1.1 Water Quality.....	5
5.1.2 Wetlands	6
5.1.3 Floodplains	7
5.2 Threatened and Endangered Species and Critical Habitat	8
5.3 Cultural Resources	9
5.4 Socioeconomic Resources	9
5.4.1 Environmental Justice	10
5.4.2 Hazardous Materials	11
6. Cumulative Impacts.....	12
7. Public Involvement	12
8. Mitigation.....	12
9. List of Preparers	13

TABLES

Table 1 Summary Table – Affected Environment, Impacts, and Mitigation

LIST OF FIGURES

Figure 1 Site Map of Proposed South Choctaw Drive Group Site with 100-year Floodplain Overlay.

Figure 2 Aerial View of Proposed South Choctaw Drive Group Site

Figures 3 – 8 Photos of Typical Conditions at South Choctaw Drive Group Site

Figure 9 Typical Site Layout for South Choctaw Drive Group Site

ATTACHMENTS

Attachment 1 – FEMA Coordination letter (October 20, 2016) with Louisiana State Historic Preservation Office with SHPO Concurrence (October 24, 2016)

Attachment 2 – FEMA Coordination letter (October 18, 2016) with Louisiana State Historic Preservation Office with SHPO Concurrence (October 24, 2016)

Attachment 3 – FEMA Coordination letter (October 18, 2016) with Louisiana State Historic Preservation Office with SHPO Concurrence (October 24, 2016)

ACRONYMS AND ABBREVIATIONS

APE	Area of Potential Effect
BMP	Best Management Practices
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
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
FONSI	Finding of No Significant Impact
IHP	Individuals and Households Program
LDEQ	Louisiana Department of Environmental Quality
MHU	Manufactured Housing Unit
NEPA	National Environmental Policy Act
NPDES	National Pollutant Discharge Elimination System
NWI	National Wetlands Inventory
RCRA	Resource Conservation and Recovery Act
SHPO	State Historic Preservation Office
T&E	Threatened and Endangered Species
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 26 percent of homes in East Baton Rouge Parish were affected by the flooding. 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 victims. As of October 15, 2016, the State had received 150,855 applications; and 61,092 are from East Baton Rouge Parish. There have been 13,021 Preplacement Interviews for Manufactured Housing Units (MHUs) for East Baton Rouge Parish for both private and commercial sites. As of October 15, 2016, 27,815 displaced residents have

been awarded rental assistance in East Baton Rouge, and there are 23 Multi-Family Lease and Repair Units that have been approved.

Most of this demand will be met by repairing and improving existing multi-family housing to be utilized as temporary housing, placing a MHU on an applicant's private site, or providing them with a MHU on an available pad leased in a commercial park. However, once these options are exhausted, FEMA estimates many applicants still will remain in need of direct housing, thus supporting the need to develop a temporary group-housing site, hereinafter a "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; Farmland Protection Policy Act (Prime Farmland), Executive Order (EO) 11988 (Floodplain Management); EO 11990 (Protection of Wetlands); EO 12898 (Environmental Justice); Comprehensive Environmental Response, Compensation and Liability Act (CERCLA); and the Resource Conservation and Recovery Act (RCRA). Cumulative impacts are also evaluated. 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 site on private or publicly owned land to be leased by the General Service Administration for this purpose.

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

4. Site Selection Process and Alternatives

NEPA requires investigation and evaluation of reasonable project alternatives as part of the project environmental review process. At a minimum, FEMA's NEPA implementing regulations require the "no action" and "proposed action" alternatives 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 MHU 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 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 site alternatives have been and continue to be identified, the amount of needed housing has limited this Draft EA to the analysis of one site which was previously identified during the planning process as three separate sites due to different land ownerships. The respective three sites were formerly known as Choctaw 3, Larkswood North, and Larkswood South. These three sites are located adjacent to each other or are separated only by South Choctaw Drive. In order to fully evaluate cumulative impacts and avoid segmentation of impacts, these sites will be evaluated in this EA as one site, hereinafter called the South Choctaw Drive Group Site. The South Choctaw Drive Group Site was selected for further detailed analysis because it meets the basic site feasibility and selection criteria. However, the preparation of one EA does not prevent FEMA from developing a portion of or the entire site as a group site.

Alternative 1 – No Action Alternative

Under the No Action alternative, FEMA would not develop a temporary group site along South Choctaw Drive. 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 would not address the project's purpose and need. In addition, the site would remain in its present usage (Land Use Zone C1 and C2, commercial) until the landowners pursue other commercial opportunities.

Alternative 2 – Develop the South Choctaw Drive Group Site with MHUs (Proposed Action)

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

4.1 Project Location and Site Description

The proposed South Choctaw Drive Group Site is located in the City of Baton Rouge, East Baton Rouge Parish, Louisiana (30.469478, -91.030158). Figures 1 and 2 are a site map and an aerial photo, respectively, of the proposed site and vicinity. The site is located on South Choctaw Drive about 0.4 mile east of the junction of South Choctaw Drive and North Flannery Road. Additional roads that border or transect the site are Rushmore Drive, Franbill Drive, Sunnyhill Avenue, Larkswood Drive, and Foxlane Drive. The site consists of approximately 55 acres of relatively flat, previously cleared, and maintained grassland with large, scattered trees, mainly oaks with some sycamore and pine.

There are no structures on the site, but the site has long been planned for commercial development. In the past, the property owners installed Franbill Drive and Larkswood Drive; however, these roads have significantly deteriorated over time. In the northwest portion of the site, a ditch was constructed in what was formerly the Lively Bayou headwaters to drain the area toward the north into a larger ditch. This drainage ditch continues down the western border; Lively Bayou eventually joins into Jones Creek. An electrical substation is located just outside the northwestern border.

The southeast portion of the site contains an area, running along the southern boundary, with wetland characteristics. Wetland plants are prevalent along with wet soils. This area drains toward the southeast away from South Choctaw Drive. Typical site conditions are depicted in photos included as Figures 3 thru 8.

4.2 Proposed Project Description

The proposed South Choctaw Drive Group Site would utilize up to 55 acres of the total site. FEMA would contract for the construction of up to 177 gravel pads for the placement of MHUs to house displaced families. The proposed site layout is shown on Figure 9. Development of the site would require the installation of utilities, asphalt for main access roads and handicap parking lot, and crushed rock for MHU pads and resident parking. The site design would be such as to limit clearing of trees and avoidance of waters of the United States, wetlands, and areas within the 100-yr floodplain.

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

- Site preparation would include clearing, grading, and removal of some trees, other woody vegetation, and debris.
- Infrastructure for water, sewer, and electrical services exist off of South Choctaw Drive and connecting streets but would have to be extended onto the site.
- New lines and fire hydrants would be installed on the site.
- Storm water drainage would be developed within the site.

- 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 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, prime farmland, 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 below. 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 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.

A review of the United States Fish and Wildlife Service's (USFWS) National Wetlands Inventory (NWI) topographic map accessed on October 18, 2016 (available online at <https://fws.gov/wetlands/>), shows a segment of Lively Bayou, a waters of the United States, to along the northwest portion of the proposed site. However, this portion of Lively Bayou has been converted in the past to a man-made ditch about 20 feet wide by 5 feet deep. Further, a portion of the southeast most portion of the site has an area with wetland characteristics.

Alternative 1 – No Action Alternative

The site would remain in a grassland condition with scattered trees until developed for commercial purposes. Due to the flat topography and vegetative state of the site, there is little to no erosion on the site. Lively Bayou and other drainage ditches would continue to collect any runoff and feed these waters off the site. Therefore, there is little possibility for runoff with turbidity or sediment to adversely impact water quality in the short-term. The specific long-term impacts to water quality would be dependent upon the nature and extent of the commercial development planned for the site. However, any such development would have to be conducted in accordance with federal, state and local laws and regulations. Therefore, the long-term impacts to water quality are expected to be minor.

Alternative 2 – Develop the South Choctaw Drive Group Site with MHUs (Proposed Action)

The placement of gravel pads for MHUs would avoid the Lively Bayou and any other drainage ditches located on the site. Appropriate best management practices (BMP) would be implemented during site development to minimize sediment migration from the site into Lively Bayou or drainage ditches. The clearing of large trees would be limited to those absolutely necessary to appropriately site the housing pads. Surface runoff would be controlled by using siltation controls such as silt fencing around the construction site to minimize erosion of materials off the site. 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. Any fill stored on site would be covered to prevent erosion. In order to control storm water runoff, the contractor would be required to construct drainage features so that runoff would not cause nuisance flooding during heavy rainfall events. The drainage system would be required to meet state and parish requirements.

These actions would prevent the 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.

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.”

A review of the United States Fish and Wildlife Service’s (USFWS) National Wetlands Inventory (NWI) map accessed on October 18, 2016 (available online at <https://fws.gov/wetlands/>), showed no wetlands on the project site. However, a site visit found the presence of vegetation with wetland characteristics along the southeast boundary of the site. The proposed site layout was designed to avoid this portion of the South Choctaw site.

Alternative 1 – No Action Alternative

Under the No Action alternative, the proposed site would remain in its current condition until developed for commercial use. The wetlands identified on the southeast portion of the site could be impacted by commercial development. However, any such development would have to be conducted in accordance with federal, state, and local laws and regulations. Therefore, the short- and long-term impacts to wetlands are expected to be minor.

Alternative 2 – Develop the South Choctaw Drive Group Site with MHUs (Proposed Action)

Under the proposed action, wetland areas identified on the project site would be avoided. No wetlands would be impacted by the temporary placement of MHUs on the site. Thus, there would be no short- or long-term impacts to wetlands.

5.1.3 Floodplains

EO 11988 Floodplain Management was issued to avoid or minimize short- and long-term adverse impacts associated with the occupancy and modification of floodplains. Based on the FEMA Flood Insurance Rate Map (FIRM) panel number 22033C0260E dated 05/02/2008, accessed on October 18, 2016 (at <https://msc.fema.gov/portal>), the northwest corner of the proposed site is located within the 100-year flood plain, Zone AE. The remainder of the site is zoned “X,” an area of reduced flood risk due to levee.

Alternative 1 – No Action Alternative

Under the No Action alternative, the site would continue to be zoned for commercial purposes. However, any such development would have to be conducted in accordance with federal, state and local laws and regulations. Therefore, the short- and long-term impacts to water quality are expected to be minor.

Alternative 2 – Develop the South Choctaw Drive Group Site with MHUs (Proposed Action)

Under the proposed action, the group site would be designed to avoid the placement of temporary MHUs in the floodplain, Zone AE (Figure 1). Only that portion of the project site outside the 100-year floodplain (Zone X), up to 42 acres of the 55 total acres, would be available for the group site. Some trenching for utilities would be required which would originate from South Choctaw Drive or Rushmore Drive. Efforts would be made to avoid utility work in the floodplain, but it is possible some trenching could occur within the floodplain in order to reach the group site. This would result in minor ground disturbance but would not change topography. Thus, the proposed action would not adversely affect floodplain values.

5.2 Threatened and Endangered Species and Critical Habitat

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

A review on October 18, 2016, of the Threatened and Endangered Species (T&E) List by the USFWS indicated there are 19 animal species and 3 plant species found within Louisiana. A review of the USFWS Information for Planning and Conservation website (<https://ecos.fws.gov/ipac/>) accessed on October 18, 2016, indicated there are no critical habitats for any of these listed species located in East Baton Rouge Parish.

A review on October 18, 2016, of the Louisiana State threatened and endangered species list (<http://www.wlf.louisiana.gov/wildlife/species-parish-list>) indicated the presence of 17 animal and 9 plants within the East Baton Rouge Parish.

Alternative 1 – No Action Alternative

Under the No Action alternative, the proposed group site would continue to be zoned as a commercial site. Federal or State listed species are not known to occur on the proposed site. Any use of the site by these species would be rare since there isn't sufficient type and area to support these species. Thus, there would be no short- or long-term impacts to threatened and endangered species or critical habitat.

Alternative 2 – Develop the South Choctaw Drive Group Site with MHUs (Proposed Action)

Based on the reviews conducted above and the site visits, the proposed group site does not contain suitable habitat for any Federal or State listed species. Any use of the group site by any of these species would be rare and temporary at best. And, since no designated critical habitats are found within the proposed group site, no occurrence of T&E species is expected. Therefore, FEMA has made the determination that the proposed action alternative would have no effect on federal or state listed species and would not adversely modify any critical habitat.

5.3 Cultural Resources

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

Alternative 1 – No Action Alternative

Under the No Action alternative, the proposed site would continue to be utilized as a heavy commercial site. Ground disturbance activities have been conducted in the past by the various landowners. During this time, no evidence of cultural resources were reported to the State Historic Preservation Office (SHPO). Thus, there would be no short- or long-term impacts to cultural resources.

Alternative 2 – Develop the South Choctaw Drive Group Site with MHUs (Proposed Action)

FEMA has defined the Area of Potential Effect (APE) for the proposed undertaking as the maximum horizontal and vertical limits of excavation and construction, as well as all areas of ground disturbance, utility installation, clearing and grubbing, and 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. SHPO concurrence with this determination was received in three separate responses, all dated October 24, 2016. The coordination letters with SHPO concurrence are provided as Attachments 1 through 3.

The contractor would monitor ground-disturbing activities during construction, 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 1, 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 the population lives below poverty levels.

Approximately 20 acres of the group site is zoned C1, light commercial, while the remaining 35 acres are zoned C2, heavy commercial (<http://ebrgis.maps.arcgis.com/apps/webappviewer/index.html?id=71eea5e62ce84b1d94be194ad8f2ac2e>). The Baton Rouge planning ordinances, Chapter 8 (<https://brgov.com/dept/planning/udc/pdf/Chapter8.pdf>), indicates Zone C2 cannot be used for residential purposes while Zone C1 can be used for residential purposes. However, on

October 12, 2016, the East Baton Rouge Parish Metropolitan Council approved the use of the proposed site as a temporary group site, due to the emergency need for housing for displaced residents, which allows the Zone C2 areas to be included in the proposed group site.

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 USCB estimated the population within the East Baton Rouge Parish as of July 1, 2015 as 46% Caucasian, 46% African American, 3 % Asian, 4% Hispanic and 1% Other Races.

Alternative 1 – No Action Alternative

The No Action alternative would preclude FEMA from adequately addressing the urgency of providing temporary 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 South Choctaw Drive Group Site with MHUs (Proposed Action)

The availability of federal assistance, including temporary housing for displaced residents, is consistent with EO 12898. All forms of FEMA disaster housing assistance are available to any affected household that meets the conditions of eligibility and demographics are not among the eligibility requirements. The MHU sites are a temporary housing solution and would be installed in the proposed sites for 18 months; therefore, long-term adverse effects to public health or to the environment would not be expected.

The specific demographics of group site occupants are not available at this time because specific individuals or families are in the process of being identified for this site. However, 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 710 residents could be temporarily relocated to South Choctaw Drive Group Site. The potential site residents would be from 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. Some localized changes to traffic patterns would be expected. However, the overall demand for public and commercial services, and changes to traffic patterns

is not expected to be greater than the pre-disaster demand and patterns. Thus, the overall short- and long-term potential impacts to environmental justice are expected to be positive.

5.4.2 Hazardous Materials

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

Upon review of the Environmental Data Resources Radius Map Report with GeoCheck on October 21, 2016, there are no facilities or activities of concern on the proposed group site. However, this database identified three businesses within 0.25 mile of the project site as Conditionally Exempt Small Quantity Generators. Two other businesses were identified as RCRA Small Quantity Generators and another four were identified as RCRA NonGenerators meaning they once were Hazardous Waste Generators but not any longer. Four businesses were identified as once having an Underground Storage Tank, but all have been removed or closed. And finally, the database identified one historical auto site (most probably an old gas station or repair shop) within 0.125 mile of the 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 South Choctaw Drive Group Site with MHUs (Proposed Action)

Under the proposed action alternative, any unusable equipment, debris, and material found on site would be disposed of prior to occupancy in an approved manner and location. In the event significant items (or evidence thereof) are discovered during construction activities, the contractor would handle, manage, and dispose of petroleum products, hazardous materials, and toxic waste in accordance with the requirements and to the satisfaction of the governing local, state, and federal agencies.

Based on the results of the Environmental Data Resources Radius Map Report database, these businesses do not present a short- or long-term risk to the environment at the proposed group site. Therefore, no impacts from hazardous materials or substances are expected with the proposed action.

6. Cumulative Impacts

Cumulative impacts are defined as environmental effects that are greater in magnitude, extent, or duration than the direct and indirect effects of the proposed FEMA-associated action when combined with the effects of other current and future actions, regardless of the proponent. Given the proposed action is temporary, short-term (up to 18 months) cumulative affects to the area surrounding the site as a result of site development and occupancy are not anticipated. Also, after the 18 months have ended, FEMA would remove all MHUs and return the site to pre-group site conditions to the extent possible or in accordance with lease terms with the landowner.

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 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 BMP will be implemented during site development to minimize sediment migration from the site into nearby water bodies. Surface runoff will be controlled by using siltation controls such as silt fencing around the construction site to minimize erosion of materials into adjacent wetlands and/or waterways. Any disturbed soil will be protected with seed or sod after construction in order to decrease the amount of soil eroded by rainfall and runoff. Any fill stored on site will be appropriately covered to prevent erosion.
2. In order to control storm water runoff, the contractor will be required to design and construct drainage features so that flows will not cause nuisance flooding during heavy rainfall events. The drainage system will be required to meet local and county requirements
3. The contractor will monitor ground-disturbing activities during construction, 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.

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. To reduce construction noise impacts to any adjacent sensitive noise receptors, construction activities with elevated noise levels will be limited from 7:00 A.M. to 7:00 P.M., unless otherwise approved by the Parish. Equipment and machinery used during construction will meet all local, State, and federal noise regulations.
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: Kenneth R. Sims, NEPA Team Lead, USACE; Thomas A. Lightcap, NEPA Specialist, USACE.

Field Team: Steve Robinson, Environmental Specialist, USACE; Richard Beatty, Environmental Specialist, FEMA Reservist.

Reviewers: Kevin Jaynes, Regional Environmental Officer, FEMA; Adam Borden, Deputy Environmental Advisor, FEMA; Alan Hermely, Environmental Specialist, FEMA.

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

Resource Area	No Action Alternative	Alternative 2 Proposed action: Develop the South Choctaw Drive Group Site with MHUs	Mitigation	Agency Coordination/ Permits
Water Quality	No change from current conditions	There is potential for localized increase in runoff and sediment and turbidity transport as a result of site preparation activities. Potential temporary impact to water quality in ditches and streams.	MHUs would not be placed in waters of the United States (Lively Bayou). Appropriate BMP would be implemented during site development to minimize sediment migration from the site into waters of the United States. 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. The contractor would appropriately cover any fill stored on the site to prevent erosion. In order to control storm water runoff, the contractor would design and construct drainage features so that flows would not cause nuisance flooding during heavy rainfall events. The drainage system will be required to meet local and county 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	Applicant must coordinate with the LDEQ and obtain required permits prior to initiating work. All coordination pertaining to these activities and applicant compliance with any conditions would be documented and copies forwarded to the state and FEMA for inclusion in the permanent project files.
Wetlands	No change from current conditions.	None, design would avoid wetlands	No MHUs would be installed on the Project site where wetlands occur.	None
Floodplains	No change from current conditions.	No MHU would be installed within the 100-year floodplain.	No MHUs would be installed within the 100-year floodplain.	None

Resource Area	No Action Alternative	Alternative 2 Proposed action: Develop the South Choctaw Drive Group Site with MHUs	Mitigation	Agency Coordination/ Permits
Threatened and Endangered Species and Critical Habitat	No change from current conditions.	No Threatened and Endangered Species and Critical Habitat on the proposed Site.	None.	None
Cultural Resources	No change from current conditions.	FEMA has determined that there would be no historical properties affected as a result of the proposed action. The SHPO concurred with this determination on October 24, 2016.	The contractor would monitor ground disturbance and if any potential archeological resources are discovered, would immediately cease construction in that area and notify the Louisiana Governor's Office of Homeland Security and Emergency Preparedness, and FEMA.	FEMA has consulted with SHPO and obtained concurrence on October 24, 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.	To reduce construction noise impacts to any adjacent sensitive noise receptors, construction activities with elevated noise levels will be limited from 7:00 A.M. to 7:00 P.M., unless otherwise approved by the Parish. Equipment and machinery used during construction will meet all local, State, and federal noise regulations.	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 would be disposed of prior to occupancy in an approved manner and location. In the event significant items (or evidence thereof) are discovered during implementation of the project, 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.	None

Figure 1 - Site Map of Proposed South Choctaw Group Site with 100-year Floodplain Overlay. (Latitude 30.46882, Longitude -91.03039)

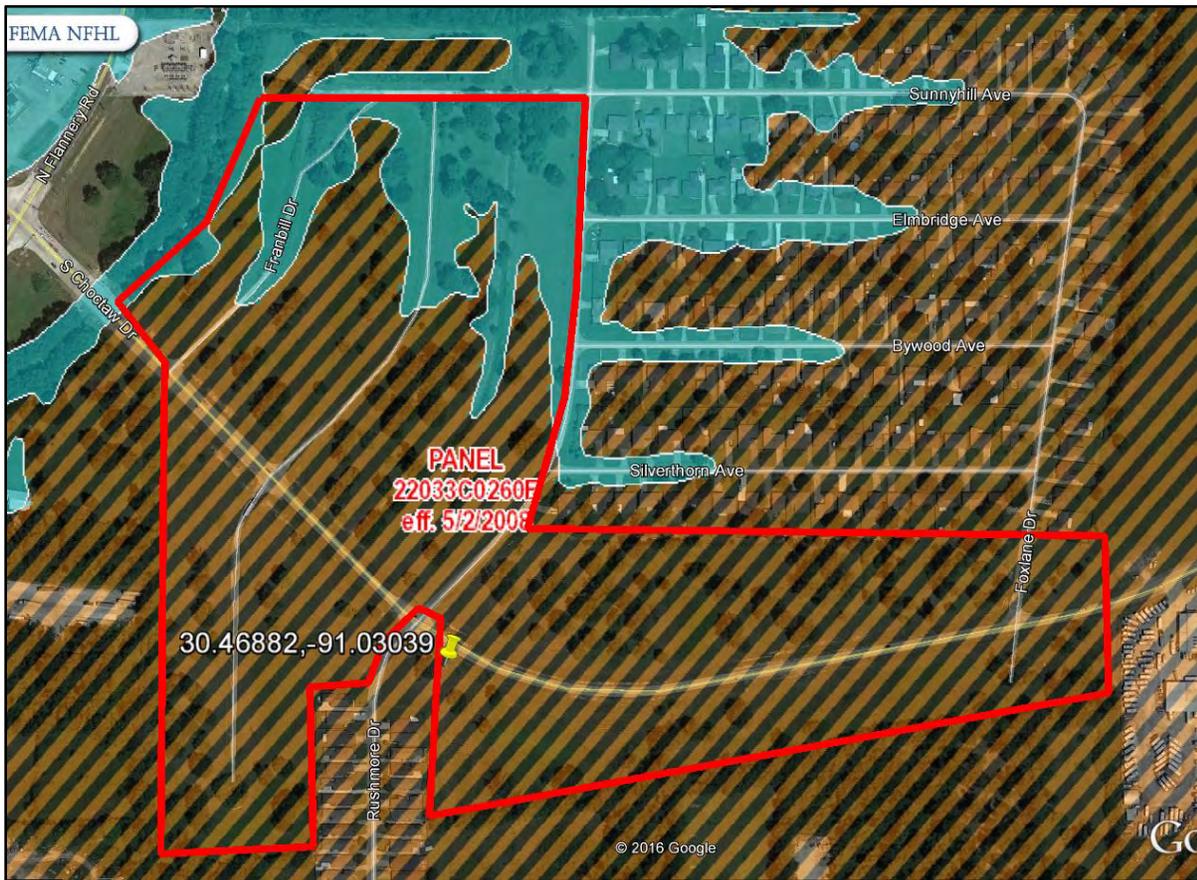


Figure 2 - Aerial View of Proposed South Choctaw Group Site.

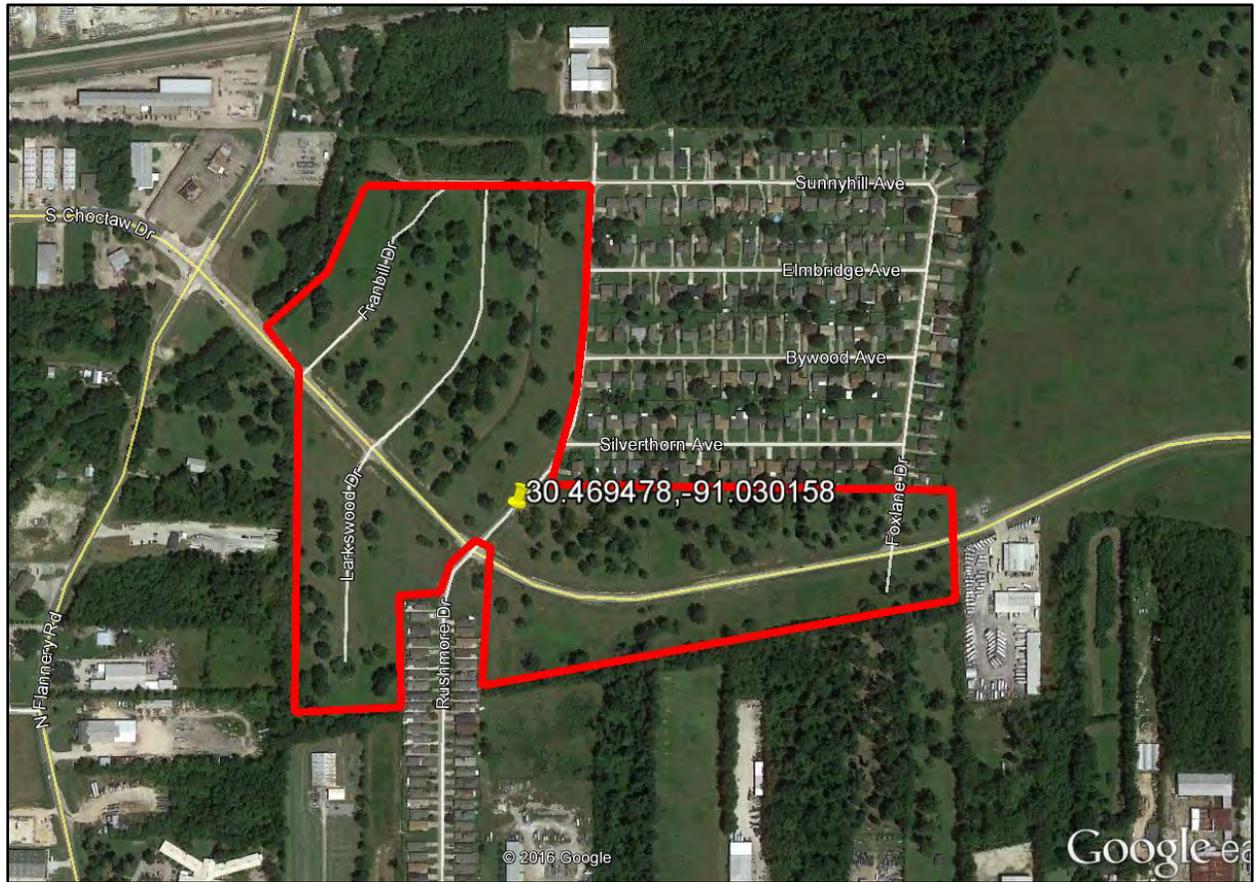


Figure 3 - Typical Conditions Northwest Portion of South Choctaw Drive Group Site



Figure 4 - Typical Conditions Northwest Portion of South Choctaw Drive Group Site



Figure 5 - Typical Conditions Southwest Portion of the South Choctaw Drive Site



Figure 6 - Typical Conditions Southwest Portion of South Choctaw Drive Group Site



Figure 7 - Typical Conditions on Eastern Portion of Site Looking West along South Choctaw Drive



Figure 8 - Typical Conditions on Easternmost Portion of the South Choctaw Drive Group Site



Attachment 1 – October 20, 2016 FEMA Coordination letter with Louisiana State Historic Preservation Office with SHPO Concurrence, page 1 (Choctaw South, attachments not included but are similar to Figures 1 thru 9).

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



October 20, 2016

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.

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

A handwritten signature in blue ink, appearing to read "Phil Boggan", is written over a faint circular stamp.

Phil Boggan
State Historic Preservation Officer

Date
10/24/2016

Dear Mr. Boggan,

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

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

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

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

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

Attachment 1 – October 20, 2016 FEMA Coordination letter with Louisiana State Historic Preservation Office with SHPO Concurrence, page 2 (Choctaw 3, attachments not included but are similar to Figures 1 thru 9).

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 Choctaw 3 Site location is an approximately 22 acre parcel of land located on South Choctaw Drive, about .3 miles to the west of North Flannery Rd. The area, which includes an 11 acre parcel to the north of South Choctaw Drive, and an 11 acre parcel of land to the south of South Choctaw Drive, has previously been cleared for development.

The southern parcel is bounded to the north by South Choctaw Road, on the east side by a large RV Dealership, on the west side by a subdivision, and on the south side by a tree line and drainage ditch. The site is a field with herbaceous vegetation and scattered mature water oaks. The ground is relatively level and slopes from north to south. The south 1/2 of this site contains wetland soils and is dominated by hydrophilic vegetation. Drainage is routed through ditches on the east and south boundaries and a N-S shallow drain near the middle of this site.

The northern parcel is bounded on the south by South Choctaw Road, on the east by Foxlane Drive, on the north by a residential subdivision, and on the west by Rushmore Drive. The site is an open meadow with herbaceous vegetation and a large number of mature oaks trees. The ground is relatively level and slopes from east to west. Drainage is routed through ditches on the south and north boundaries with several swales and shallow ditches that bisect the area.

Area of Potential Effect

36 CFR § 800.4 requires federal agencies to define the Area of Potential Effect (APE). The project location, including dimensions of disturbance, are provided below and attached maps define the limit 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
Choctaw 3	30.469747, - 91.029867	30.469744, - 91.025626	30.468579, - 91.024879	30.467757, - 91.030516

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. Just to the west of the site and outside of the APE is an area surveyed in 1990 for the “Literature Search and Research Design Amite and Tributaries Project, Ascension, East Baton Rouge and Livingston Parishes, Louisiana” by R. Christopher Goodwin & Associates, Inc. for the U.S. Army Corps of Engineers, LA Survey #22-1467. The survey was conducted to provide historical and archeological data necessary for completing

Attachment 1 - FEMA Coordination letter (October 20, 2016) with Louisiana State Historic Preservation Office with SHPO Concurrence (October 24, 2016), page 3 (Choctaw 3, attachments not included but are similar to Figures 1 thru 9).

feasibility studies of flood control measures. No known archaeological or historic sites were identified within the APE of the Choctaw 3 East Baton Rouge 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 the installation of temporary MHU's:

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

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

Sincerely,



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

Attachments:

Aerial Map
LA Cultural Resource Map
Photos

Attachment 2 – FEMA Coordination letter with Louisiana State Historic Preservation Office (October 18, 2016) with SHPO Concurrence (October 24, 2016) (Larkwood North, attachments not included but are similar to Figures 1 thru 9).

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



October 18, 2016

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.

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

A handwritten signature in blue ink, appearing to read "Phil Boggan", is written over a light blue horizontal line.

Phil Boggan
State Historic Preservation Officer

Date

10/24/2016

Dear Mr. Boggan,

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

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

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

Attachment 2 – FEMA Coordination letter with Louisiana State Historic Preservation Office (October 18, 2016) with SHPO Concurrence (October 24, 2016) (Larkwood North, attachments not included but are similar to Figures 1 thru 9).

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.

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 Larkwood North location is a 28 acre parcel of land located on S. Choctaw Drive, one block east of North Flannery Rd. The area had been partially developed previously for residential housing. Streets and curbs had been installed. There is a 3 to 4-foot deep drainage ditch bisecting the area in a north/south direction on the eastern side of the property. The ditch empties into a larger ditch on the north side of the property. A major community drainage structure is located just west of the proposed site. The site is bordered on the south by S Choctaw Drive and bordered to the east by additional grassy/forested areas and residential development. The northern border abuts a drainage ditch and forested areas. A large drainage ditch and an electrical substation are located just outside the western border.

Area of Potential Effect

36 CFR § 800.4 requires federal agencies to define the Area of Potential Effect (APE). The project location, including dimensions of disturbance, are provided below and attached maps define the limit 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
Larkwood North	30.47291, -91.03189	30.47296, -91.02914	30.46929, -91.03054	30.47130, -91.03298

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. Portions of the Larkwood North location lie within the area surveyed in 1990 for the “Literature Search and Research Design Amite and Tributaries Project, Ascension, East

Attachment 2 – FEMA Coordination letter with Louisiana State Historic Preservation Office (October 18, 2016) with SHPO Concurrence (October 24, 2016) (Larkwood North, attachments not included but are similar to Figures 1 thru 9).

Baton Rouge and Livingston Parishes, Louisiana” by R. Christopher Goodwin & Associates, Inc. for the U.S. Army Corps of Engineers, LA Survey #22-1467. The survey was conducted to provide historical and archeological data necessary for completing feasibility studies of flood control measures. There are no known archaeological or historic sites within the vicinity of the Larkwood North 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 the installation of temporary MHU’s:

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

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

Sincerely,


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

Attachment 3 – FEMA Coordination letter (October 18, 2016) with Louisiana State Historic Preservation Office with SHPO Concurrence (October 24, 2016) (Larkwood South, attachments not included but are similar to Figures 1 thru 9).

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



October 18, 2016

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.

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


Phil Boggan
State Historic Preservation Officer

Date

10/24/2016

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

Attachment 3 – FEMA Coordination letter (October 18, 2016) with Louisiana State Historic Preservation Office with SHPO Concurrence (October 24, 2016) (Larkwood South, attachments not included but are similar to Figures 1 thru 9).

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 Larkwood South Location is an approximately 11 acre area located on S. Choctaw Drive, just east of North Flannery Road, that was cleared and prepared for residential development in the 1990s. The majority of the land features an upland herbaceous cover of grasses and forbs, interspersed with mature oak trees and clumps of smaller woody plants. The area is periodically mowed. A substantial amount of household waste is present at the site, likely washed in by the flood waters. The Larkwood South location is bounded by treelines to the west and south, by the rear yards of houses in a residential development to the east, and by South Choctaw Drive to the north. The acreage is bisected by an overgrown paved road, Larkwood Drive, which runs north to south and intersects with South Choctaw Drive.

Area of Potential Effect

36 CFR § 800.4 requires federal agencies to define the Area of Potential Effect (APE). The project location, including dimensions of disturbance, is provided below and attached maps define the 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
Larkwood South	30.470742, - 91.032688	30.469125, - 91.030834	30.467483, - 91.031515	30.467355, - 91.032829

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 known archaeological or historic sites within the vicinity of the

Attachment 3 – FEMA Coordination letter (October 18, 2016) with Louisiana State Historic Preservation Office with SHPO Concurrence (October 24, 2016) (Larkwood South, attachments not included but are similar to Figures 1 thru 9).

Larkwood South Location as of September 24, 2016. However, a preliminary cultural resource study of several flood control items under consideration along the Amite River and its tributaries was conducted in 1990, and overlaps with the APE.

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 the installation of temporary MHUs:

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

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

Sincerely,



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

Attachments:

Aerial Map
LA Cultural Resource Map
Photos