

Final Environmental Assessment

Greg's Mobile Home Park

Temporary Community Housing Site

Bridge City, Orange County Texas

FEMA-1791-DR-TX

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FEMA

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800 N. Loop 288
Denton, TX 76209-3698**

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Bridge City, Orange County
Hurricane Ike
FEMA-1791 DR -TX**

A. Introduction

Hurricane Ike, a Category 2 hurricane with a storm surge above normal high tide levels, moved across the Texas coast on September 13, 2008. Maximum sustained winds at landfall were estimated at 125 miles per hour. President Bush declared a major disaster for the State of Texas due to damages from Hurricane Ike signing a disaster declaration (FEMA-1791-DR-TX) on September 13, 2008, authorizing the Department of Homeland Security's Federal Emergency Management Agency (FEMA) to provide federal assistance in designated areas. FEMA proposed to administer this disaster assistance pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), PL 93-288, as amended. Section 408 of the Stafford Act authorizes FEMA's Individual Households Program to provide emergency and temporary housing for eligible disaster victims whose homes are uninhabitable or destroyed as a result of the declared event.

This Final Environmental Assessment (EA) has been prepared in compliance with the National Environmental Policy Act of 1969 (NEPA); the President's Council on Environmental Quality regulations implementing NEPA (40 CFR 1500-1508); and FEMA's regulations implementing NEPA (44 CFR 10.9). The purpose of this EA was to analyze potential environmental impacts of the temporary community housing site expansion at Greg's Mobile Home Park, as part of an expedited review process. FEMA used the findings in this EA to determine whether to prepare an Environmental Impact Statement (EIS) or issue a Finding of No Significant Impact (FONSI).

B. Purpose and Need

Catastrophic damage from Hurricane Ike has resulted in an extraordinary demand for housing assistance in Orange County. The purpose of this action was to fulfill FEMA's mandate under the Individual and Households Program to expeditiously provide temporary housing for eligible disaster victims. To date, about 26,773 requests for federal assistance have been received for Orange County and of these requests, approximately 5,644 (total Pre-Placement Interviews) are for temporary housing assistance (FEMA Individual Assistance Program Summary Report 12/05/08). The estimated number of applications for direct housing assistance, provision of a manufactured housing unit on an available private, commercial park or community site location, was 2,000 for Orange County (FEMA Individual Assistance Program Manufactured Housing Activity Report 12/05/08). Most of this demand will be met by placing a mobile home on an applicant's private site or providing them with a mobile home 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 community housing site, hereafter "community site."

C. Environmental Review Process

In order to meet the urgent needs of disaster victims in need of temporary housing, FEMA implemented an expedited environmental review process. The purpose of this document was to assist FEMA in fulfilling its environmental review responsibilities under NEPA and serve as a vehicle to document compliance under other applicable environmental laws. Laws and Executive Orders addressed through this EA include: the Clean Air Act, Clean Water Act, Endangered Species Act, National Historic Preservation Act, Executive Order 11988 (Floodplain Management), Executive Order 11990 (Protection of Wetlands), Executive Order 12898 (Environmental Justice), and Farmland Protection Policy Act. Other resource areas or issues evaluated in this EA included floodplain, coastal zone, noise, visual resources, traffic, socioeconomics, safety and security, and hazardous and toxic waste. Agency coordination/consultation was conducted on a site by site basis as necessary.

The scope of FEMA's environmental review included evaluating project alternatives, characterizing the affected environment, identifying potential environmental impacts, and outlining ways to reduce or minimize adverse affects. This EA examined the site-specific environmental impacts associated with building a proposed FEMA community housing site on privately owned land that would be leased by the General Service Administration for this purpose.

This EA was prepared based on a site evaluation, document research, and resource agency information. An electronic version of the Draft EA was provided to interested agencies prior to and during the public comment period. The public participation period was brief, as necessitated by the emergency circumstances. Agency coordination and consultation was deemed complete at the end of the public comment period. FEMA believes that this process allowed for sufficient action analysis and met the goal of providing timely federal assistance to disaster victims.

D. 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; federally assisted housing options, including minor home repairs, rental assistance and installing a mobile home or Park model on a private site or in an existing mobile home park, are being exhausted first; for those requesting housing assistance in the impacted area. These options rapidly deplete with the high demand; accordingly, a remaining alternative was to build an emergency and temporary community housing site where the above options do not satisfy the demand.

In order to expedite the community housing site selection process, FEMA has been working closely with local officials to identify potential sites followed by a site reconnaissance and research to determine suitability. Important factors considered in choosing a site include: demand for temporary housing in that area, community acceptance, proximity of community 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 site, and environmental/cultural resource sensitivities. FEMA continues to evaluate alternative sites in Orange County, and other counties within coastal southeast Texas. Although various alternatives have been and continue to be identified, the extraordinary amount of needed housing have limited this EA to analysis of one suitable site alternative. The Greg's site was selected for further analysis because it met the basic site feasibility and selection criteria.

Alternative 1- No Action Alternative

Under the No Action alternative, FEMA would not develop a temporary community housing site for this area. Displaced residents would continue to stay with relatives/friends, in hotels, or other temporary locations until they resolve their own long-term housing needs.

Alternative 2 – Develop the Greg's Site with Mobile Homes (Proposed Action)

The Proposed Action provides temporary housing for eligible disaster victims displaced by Hurricane Ike in Bridge City, Texas. Disaster victims would be temporarily relocated to the site with an expected occupancy up to 18 months while they resolve their permanent housing solution.

Project Location and Site Description

The site is located at 515 Jones Street in Bridge City, Orange County, Texas. It is bordered on the north by mobile homes and pasture, on the south by Jones Street, then woods and wetlands, on the east by residential and commercial property; and west by widely spaced residences. The site is located on the outskirts of Bridge City, Texas.

The site consists of approximately 5 acres of land lying adjacent to an existing mobile home park. The proposed action would be an addition to the existing park. The property owner has initiated construction on the site, thus

the area is highly disturbed. Prior to the construction, the area had a vegetative cover of native grasses that were periodically mowed by the owner.

Project Description

The project description was based on the site preliminary design completed on November 28, 2008. The proposed action involves the construction of a mobile home community site (hereafter “community site”) that will accommodate approximately 28 units (see Appendix 1 for preliminary site design). At this time, occupancy is not expected to exceed 18 months followed by several months for demobilization. In a letter dated November 13, 2008, the Galveston City Manager indicated that this community site is approved for development.

The following specific site development components are included with this project:

- Site preparation will include minimal clearing, grading, and removal of any woody vegetation.
- Electrical services will be above ground and connected to existing utilities from Jones Road.
- Potable water will be connected below ground to the existing service lines located along within the community park. New lines and hydrants will be installed on the property for all units.
- A gravity flow sanitary sewer system will collect and transport effluent to an existing utility line. The tie-in to local sewer is located within the established park.
- Access to the Park is planned from Jones Road.
- Stormwater drainage will be addressed by existing features.
- Interior roadways and pads will be constructed of concrete.
- Uniform Federal Accessibility Standard features will be included in 15% of pads and mobile homes, 15% of common space, and 100% of necessary public amenities.
- This is an extension of an existing park that required coordination with the park owner.

When the temporary housing need has ended, FEMA expects that the homes will be removed from the site. The Park will then be used by the landowner in a manner consistent with local zoning classifications or seeded and reasonably restored to its previous conditions.

E. Affected Environment and Environmental Consequences

Table 1 summarizes the results of the environmental review process for the Proposed Action. Potential environmental impacts that were found to be negligible are not evaluated further. Resource areas that have the potential for impacts of minor, moderate, or major intensity are further developed in Section F. When applicable, mitigation measures that would reduce potential adverse effects are incorporated in site development and required as conditions for the project to proceed. Definitions of the impact intensity are described below:

Negligible: The resource area (e.g., geology) would not be affected, or changes would be either non-detectable or if detected, would have effects that would be slight and local. Impacts would be well below regulatory standards, as applicable.

Minor: Changes to the resource would be measurable, although the changes would be small and localized. Impacts would be within or below regulatory standards, as applicable. Mitigation measures would reduce any potential adverse effects.

Moderate: Changes to the resource would be measurable and have both localized and regional scale impacts. Impacts would be within or below regulatory standards, but historical conditions are being altered on a short-term basis. Mitigation measures would be necessary and the measures would reduce any potential adverse effects.

Major: Changes would be readily measurable and would have substantial consequences on a local and regional level. Impacts would exceed regulatory standards. Mitigation measures to offset the adverse effects would be required to reduce impacts, though long-term changes to the resource would be expected.

Alternative 1- No Action Alternative

The No Action alternative would not impact the existing environment, as no site preparation or construction would occur for temporary community housing purposes. This alternative would preclude the federal government from adequately addressing the urgency of providing temporary and transient emergency housing. Consequently, displaced disaster victims 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 flood victims and their communities would be further compounded by fewer housing options. They would continue to suffer social and economic stresses related to the disaster recovery.

Alternative 2 - Develop the Greg's Site with Mobile Homes (Proposed Action)

The Proposed Action will provide temporary housing for eligible disaster victims displaced by Hurricane Ike from Orange County. Disaster victims will be temporarily relocated to the expanded Greg's site with an expected occupancy of up to 24 months (which includes a site deactivation period) while they resolve their permanent housing solution. Environmental impacts associated with implementation of Alternative 2 are discussed in Table 1 (Affected Environment and Environmental Consequences) and in Section F.

Table 1. Affected Environment and Environmental Consequences Matrix.

Resource Area	Impact Intensity				Impact Summary	Agency Coordination / Permits	Mitigation
	Negligible	Minor	Moderate	Major			
Geology and Soils	X				There are no prime and unique farmlands on the project site. Potential for localized increase in soil erosion during construction. (See water quality section F.)	Texas Pollutant Discharge Elimination System (PDES) stormwater construction permit to be obtained by construction contractor.	Implement construction Best Management Practices (BMPs). Install silt fences/straw bales to reduce sedimentation. Area soils would be wetted during construction to minimize wind erosion. If fill is stored on site, the contractor is required to cover it appropriately.
Hydrology and Floodplains (Executive Order 11988)	X				Project area is located in Zone C , outside of the 100-year floodplain per the FEMA Flood Insurance Rate Map 480510 0175 B. The nearest floodplain is 625 ft. to the west. Site development and occupancy is not expected to affect nearby floodplains.	None.	None.
Wetlands (Executive Order 11990)	X				No wetlands were observed at the project site during the field reconnaissance. No wetlands were shown on the USFWS National Wetland Inventory (NWI) maps. No impacts to wetlands are anticipated.	None.	None.
Coastal Zone Management	X				Project site is located within the boundaries of the Coastal Zone, but temporary residential site development and occupancy has been determined consistent with the State's coastal zone management plan.	None.	None
Water Quality	X				There is potential for localized increase in sedimentation as a result of site preparation activities. Potential impact to water quality in downstream swales, ditches, and streams (e.g., turbidity, siltation, biological oxygen demand).	Storm water permits to be obtained by construction contractor.	Contractor to implement requirements of Storm water permit. These include Best Management Practices such as installation of silt fences, straw bales, etc. to reduce sedimentation. If fill is stored on site, the contractor is required to cover it appropriately.

Resource Area	Impact Intensity				Impact Summary	Agency Coordination / Permits	Mitigation
	Negligible	Minor	Moderate	Major			
Air Quality	X				Orange County is designated an area of Non-Attainment per the US Environmental Protection Agency. Residential site development and occupancy is consistent with the State Implementation Plan. Negligible impact would be anticipated from vehicle exhaust emissions and increased dust during construction.	EPA Region 6 designation.	Site soils will be covered and/or wetted during construction to minimize fugitive dust.
Vegetation and Wildlife	X				The project site is sparse native grasses and cleared ground due to development efforts by the owner.	None.	Once the temporary housing need has ended, the site will be seeded and restored to previous conditions to the extent practical and/or used by the landowner in a manner consistent with local zoning.
Threatened and Endangered Species (Endangered Species Act, Section 7)	X				No threatened or endangered species or designated critical habitat occurs at the site. No effect is anticipated to threatened or endangered species or their habitat as a result of site development and occupancy.	USFWS has been advised of this proposed project, letter of concurrence received 12/04/08.	None.
Cultural Resources (National Historic Preservation Act, Section 106)	X				Through site pedestrian survey and review of the Texas Historical Commission's Atlas database, FEMA has determined that there are no National Register listed or eligible historic properties in the Area of Potential Effect (APE).	SHPO concurrence letter dated December 8, 2008.	None.
Socioeconomics	X				Site occupancy is expected to be about 60 people [28 units x estimated 2.5 people per unit] maximum. It is expected the site residents are currently displaced residents of Orange County. See Section F.	On November 13, 2008 the City issued a formal letter of no objection for the establishment of the temporary community housing site.	None.
Environmental Justice (Executive Order 12898)	X				The proposed action is not expected to pose disproportionately high and adverse public health or environmental effects on minority and low-income populations. See Section F.	None.	None.

Resource Area	Impact Intensity				Impact Summary	Agency Coordination / Permits	Mitigation
	Negligible	Minor	Moderate	Major			
Noise	X				There are no excessive noise sources; such as airports, railroads, and major highways; in close proximity to the site. During the construction period residents immediately adjacent to the project site may temporarily experience elevated ambient noise levels. Due to the urgency of the situation, construction may occur on a 24-hour schedule until the site is completed. Construction noise impacts would be short-term and limited to the duration of construction activities.	None.	If necessary, the following noise reduction measures should be considered: (1) restricting the 24-hour schedule to the first two weeks of construction; (2) using a 7 a.m. to 7 p.m. construction schedule; (3) completing construction closest to adjoining residents first; and (4) completing noisier activities during the day if a 24-hour schedule is used.
Safety and Security	X				No site safety or security concerns were observed during site reconnaissance.	None	The contractor will post appropriate signage and fencing to minimize potential adverse public safety concerns, including placing fencing around the site perimeter. 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.
Hazardous Materials and Toxic Wastes	X				A Phase I Environmental Site Assessment has been completed through direct field observation and review of existing records and databases for potential site or adjacent site hazardous materials contamination. Minor sites such as old trash piles and small fuel tanks were noted but not of concern. No environmental conditions were observed during fieldwork or noted during research.	Phase 1 search was by GeoSearch job# 1426 dated 12/03/08. Also an oil and gas pipeline search was conducted on the Texas Railroad Commission database.	None
Traffic and Transportation	X				Traffic volumes on the local road network in the immediate project area would increase during construction and occupancy. The existing infrastructure would be able to accommodate these increases without impacting local traffic patterns.	None.	None.

F. Additional Impact Analysis

Cultural Resources

Background research of the Greg's property on the Texas Historical Commission's Atlas web application indicated several previously recorded archaeological sites within one mile of the project Area of Potential Effect. Field personnel meeting Secretary of the Interior Standards for archaeological investigators noted no apparent evidence of cultural, historical, or archaeological resources during their site visit. The FEMA on-site archeology report stated: "There are no archaeological resources or historic sites documented in the immediate vicinity of the APE. The nearest documented site is 41OR36, an excavated shell midden approximately 1.5 miles SW of Gregg's MH Park. There are no high probability landforms or waterways in the immediate vicinity of the APE. The property is pre-disturbed. According to area residents, a series of small ponds were excavated and later filled in on the property. This suggests low probability for archaeological resources.

Socioeconomics

The project site is located in the 77611 zip code of Texas. According to the 2000 Census, zip code 77611 had 9814 residents, and 2384 housing units. The median household income was estimated at about \$42,606 (based on 1999 dollars) (Census 2000). The primary employment sectors are petro-chemical, transportation of goods and administrative. According to the U.S. Department of Labor <http://www.bls.gov/eag/eag.tx.htm> census, about 7.1 percent of the area's civilian labor force is unemployed (Sept. 2008).

With the establishment of the site, up to approximately 64 residents will be temporarily relocating to the Bridge City area (25 units x estimated 2.5 people per unit), although some of the potential site residents may be residents of the area currently displaced from their homes. The local community is aware of this action and would experience an increase in the need for public services, such as schools, fire and police services, child care, and medical services. However, the demand for public and commercial services is not expected to be greater than the pre-hurricane demand and potential impacts would be minimal.

Environmental Justice

Executive Order (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 the EO is to avoid disproportionately high and adverse public health or environmental impacts to the target populations. Further, EO 12898 also tasks Federal agencies to ensure that public notifications regarding environmental issues are concise, understandable, and readily accessible.

The population within the 77611 zip code is comprised of about .3 percent African American, 95.5 percent Caucasian, and approximately 7.5 percent of the families are living below the poverty level. In comparison to Orange County and Texas, the zip code has a lower percentage of families below the poverty level, a lower percentage of African American residents and 3.5% other minorities (Table 2) (Census 2000).

Table 2: Minority and Low Income Populations Summary Statistics

Subject	City	County	Texas
Demographics			
Caucasian	95.4%	81.9	71%
African American	.2%	9.8%	11.5%
Other	3.6%	7.2%	15.2%
Families below poverty	7.9%	8.3%	12.2%

Source: U.S. Census Bureau, Census 2000

The proposed action is not expected to pose disproportionately high and adverse public health or environmental effects on minority and low-income populations. 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 and demographics are not among the eligibility requirements.

The specific demographics of community 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 future Park 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.

Hazardous Materials and Wastes

A database review of reported hazardous materials contaminated sites and generators; and records review with the Texas Commission on Environmental Quality, yielded no known on-site or nearby location concerns related to historical contamination (GeoSearch, 12/03/2008). No environmental conditions; such as distressed vegetation and historical soil contamination were observed during field reconnaissance. Accordingly, no on-site soil sampling was deemed necessary.

G. 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 (up to 18 months), long-term cumulative affects to the area surrounding the site as a result of site development and occupancy are not anticipated.

H. Public Involvement

Public involvement was performed in compliance with NEPA, FEMA’s regulations implementing NEPA at 44 CFR 10.9(c), and Executive Orders 12898, 11988, and 11990. A Public Notice was published in *Orange Leader* on Tuesday December 9, 2008. Due to the emergency nature of this action, the public comment period was brief – the three-day comment period ended on Dec. 11, 2008. Written comments on the Draft EA and Finding of No Significant Impact (FONSI) could be faxed to FEMA’s Joint Field Office in Austin at (512) 465-3764; or sent via email to FEMA-DR1791-Environmental@dhs.gov. Verbal comments could be accepted at (866) 568-1260 or TTY 1-800-462-7585 for the hearing- or speech-impaired, between 8 a.m. and 5 p.m. The Environmental Assessment could be viewed and downloaded from FEMA’s website at <http://www.fema.gov/plan/ehp/envdocuments/ea-region6.shtm>. The Draft EA was also available for public review at the FEMA Disaster Recovery Center located at 3727 N. 16th St., Suite 100, Orange, TX 77632, and at the Bridge City - City Hall, located at 260 Rachal Ave., Bridge City,

TX 77611. The DRC hours are Monday to Saturday 9 a.m. – 5:30 p.m., and City Hall hours are Monday to Friday, 8 a.m. to 11:45 a.m. and 1 p.m. to 4:45 p.m.

No comments from the public were received during the comment period.

I. Conclusion

This EA was written to evaluate the potential impacts to the environment from the No Action and Proposed Action alternatives. The EA has also addressed the compliance requirements of the National Historic Preservation Act, Endangered Species Act, Executive Orders 11988 (Floodplain Management), 11990 (Protection of Wetlands), and 12898 (Environmental Justice), and other related environmental statutes along with considering issues such as hazardous and toxic wastes, infrastructure, and socioeconomics. Based on fieldwork, proposed action scope of work and mitigation measures, research, and consultations; the findings of this EA indicate that an Environmental Impact Statement was not required. A Final Finding of No Significant Impact has been prepared and is attached.