

**Draft Supplemental Environmental
Assessment**

**General Ogden Site
Housing Project**

FEMA-1603-DR-LA

**Orleans Parish, Louisiana
May 2010**



FEMA

**U.S. Department of Homeland Security
Louisiana Transitional Recovery Office
New Orleans, Louisiana 70114**



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ABFE	Advisory Base Flood Elevation
BMP	Best Management Practice
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
DFIRM	Digital Flood Insurance Rate Map
EA	Environmental Assessment
EIS	Environmental Impact Statement
EO	Executive Order
EPA	U.S. Environmental Protection Agency
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FONSI	Finding of No Significant Impact
GOHSEP	Governor’s Office of Homeland Security and Emergency Preparedness
HANO	Housing Authority of New Orleans
HDLC	Historic District Landmarks Commission
HP	Historic Preservation
HUD	Housing and Urban Development
IAW	In Accordance with
LA	Louisiana
NEPA	National Environmental Policy Act
NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act
NRHP	National Register of Historic Places
OSHA	Occupational Safety and Health Administration
PA	Programmatic Agreement
Pb	Lead
PL	Public Law
ppm	parts per million
PW	Public Worksheet
SEA	Supplemental Environmental Assessment
SFHA	Special Flood Hazard Area
SHPO	State Historic Preservation Office
SWPPP	Storm Water Pollution Prevention Plan

1.0 INTRODUCTION

1.1 Project Authority

Hurricane Katrina, a Category 3 hurricane with a storm surge above normal high tide levels, moved across the Louisiana, Mississippi and Alabama gulf coasts on August 29, 2005. Maximum sustained winds at landfall were estimated at 140 miles per hour. President Bush signed a disaster declaration (FEMA-1603-DR-LA) on August 29, 2005, authorizing the Department of Homeland Security's Federal Emergency Management Agency (FEMA) to provide federal assistance in designated areas of Louisiana. FEMA is administering this disaster assistance pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), Public Law (PL) 93-288, as amended. Section 406 of the Stafford Act authorizes FEMA's Public Assistance Program to repair, restore and replace State and local government and certain Private Nonprofit facilities damaged as a result of the declared event.

The U.S. Department of Housing and Urban Development (HUD) prepared an Environmental Assessment for HUD-funded Proposals – General Ogden Site (HUD 2007), and issued a Finding of No significant Impact (FONSI) dated May 29, 2007 (HUD 2007a). Any federal agency may adopt another federal or state agency's EA, and is encouraged to do so when such adoption would save time and money (40 CFR §1500.4(n), §1500.5(h), and §1506.3), providing the original document satisfies the agency's National Environmental Policy Act (NEPA) requirements. FEMA has adopted HUD's EA and has also provided supplemental information. HUD's EA is included as Appendix A of this document.

This draft Supplemental Environmental Assessment (SEA) has been conducted in accordance with NEPA, the President's Council on Environmental Quality regulations for implementing NEPA (40 Code of Federal Regulations [CFR] 1500-1508) and FEMA's NEPA implementing regulations at 44 CFR Part 10.

1.2 Background

As a result of wind and flooding from Hurricane Katrina, HANO's entire portfolio of affordable housing and associated structures were damaged. Scattered sites located at Chef Menteur Highway and Old Gentilly Road and America Street suffered substantial damage. These buildings provided over 100 bedrooms of affordable housing to HANO's pre-Katrina portfolio.

The purpose of this SEA is to analyze potential environmental impacts of the proposed construction project at the General Ogden site. FEMA will use the findings in this SEA to determine whether to prepare an Environmental Impact Statement (EIS) or a Finding of No Significant Impact (FONSI).

The Housing Authority of New Orleans (HANO) has submitted an application for FEMA funding under FEMA's Public Assistance Program being administered in response to FEMA-1603-DR-LA. HANO proposes to construct 22 new public housing units. The site is located "up river" in the Hollygrove neighborhood. It involves construction on both sides of the General Ogden Street. The even numbered side of the street is bounded by General Ogden, Willow,

Monticello, and Jeanette Streets: the odd numbered side of the street is bounded by General Ogden, Willow, Eagle, and Jeanette Streets. Surrounding the current site is a mix of residential neighborhoods, unsubsidized privately owned rental property, commercial sites, single family homeownership units, vacant commercial buildings, and vacant rental property. The site itself is unoccupied and will remain so in the absence of the project.

2.0 PURPOSE AND NEED

The purpose of this proposed action is to consolidate and rebuild housing units. HANO completed a comprehensive assessment of its pre-Katrina scattered site inventory and determined it would be best served to consolidate its affordable housing stock on its larger properties that were least affected by the hurricane. The newly designed units are to be more functionally suited to the requirements and lifestyles of modern day families than the 1960's donor units. HANO seeks to provide families with a safe and decent living environment consistent with today's affordable housing standards. Therefore, the proposed action is to provide safe, decent, affordable housing on sites that are less prone to flooding.

3.0 ALTERNATIVES

This section describes the alternatives that were considered in addressing the purpose and need stated in Section 2. Two alternatives were evaluated: the No Action Alternative, and the Proposed Action Alternative, which is the construction of 22 housing units contained in eleven two, three, and four bedroom duplex buildings within the Hollygrove neighborhood. It involves construction on both sides of General Ogden Street. The even numbered side of the street is bounded by General Ogden, Monticello, Willow, and Jeanette Streets; the odd numbered side of the street is bounded by General Ogden, Willow, Eagle, and Jeanette Streets.

Alternative 1: No Action

Under the No Action Alternative, the General Ogden Housing Project would not be constructed. Consequently the site would remain vacant and the shortage of safe, decent, low income housing would continue.

Alternative 2: Construct 22 New Housing Units (Proposed Action)

Activities will include the demolition of seven (7) buildings at 1400, 1408, 1416, 1424, 1432, 1433, and 1440 General Ogden, and the new construction of twenty-two (22) units, eighteen (18) of which will be public housing/tax credit units and four (4) will be tax credit/Section 8 project based housing units. Redevelopment efforts will populate the development with two (2), three (3), and four (4) bedroom duplex units designed to be compatible with the neighborhood. All outdated infrastructure will be removed and replaced (i.e. water, gas, and sewer lines). Environmental hazards such as asbestos and contaminated soil will also be removed. The goal in redeveloping the area is to foster the neighborhood revitalization efforts, which include programs emphasizing economic growth and community pride (HUD 2007).

4.0 AFFECTED ENVIRONMENT AND IMPACTS

4.1 Floodplains

Executive Order (EO) 11988 (Floodplain Management) requires federal agencies to avoid direct or indirect support of development within the 100-year floodplain whenever there is a practicable alternative. FEMA uses Flood Insurance Rate Maps (FIRMs) to identify the regulatory 100-year floodplain for the National Flood Insurance Program (NFIP).

Orleans Parish enrolled in the National Flood Insurance Program (NFIP), 8/3/1970. Per Preliminary Digital Flood Insurance Rate Map (DFIRM) Panel Number 22071C0210F, dated 11/13/2008, the site is located in a shaded Zone X, outside the Special Flood Hazard Area (SFHA).

No Action Alternative – Under the No Action Alternative, no construction would occur and there would be no impacts to floodplains.

Proposed Action Alternative – The proposed project site is not located within the 100-year floodplain. Construction of the site would not result in short- or long-term effects associated with the occupancy of or modification to floodplains and direct or indirect support of floodplain development; however, the construction should be coordinated with the local floodplain administrator and comply with floodplain ordinances.

4.2 Cultural Resources

The consideration of impacts to cultural resources is mandated under Section 106 of the National Historic Preservation Act (NHPA) as implemented by 36 CFR Part 800. Requirements include the identification of historic properties that may be impacted by the proposed action or alternatives within the project's area of potential effect. Historic properties are archaeological sites, standing structures, or other historic resources listed in or determined eligible for listing in the National Register of Historic Places (NRHP). If adverse effects on historic, archaeological or cultural properties are identified, agencies must consider effects of their activities and attempt to avoid, minimize, or mitigate the impacts to these resources.

Alternative 1: No Action Alternative - This alternative would not include any FEMA undertaking; therefore FEMA has no further responsibilities under Section 106 of the National Historic Preservation Act.

Alternative 2: Proposed Action Alternative - A review of this project action alternative was conducted in accordance FEMA's Programmatic Agreement dated August 17, 2009. FEMA determined that there was No Adverse Effect to Historic Properties as a result of the proposed undertaking. SHPO concurrence with this determination was received March 19, 2010. Consultation with Choctaw Nation of Oklahoma was conducted on February 24, 2010 in accordance with the Programmatic Agreement dated August 17, 2009. Additionally, consultation with the Alabama-Coushatta Tribe of Texas, Chitimacha Tribe of Louisiana, Coushatta Tribe of Louisiana, Jena Band of Choctaw Indians, Mississippi Band of Choctaw Indians, Quapaw Tribe of Oklahoma, Seminole Nation of Oklahoma, Seminole Tribe of Florida, and Tunica-Biloxi Tribe of Louisiana was conducted on February 24, 2010 pursuant to 36 CFR §800.2(c)(2)(i)(B). FEMA has not received a response within thirty days of receipt for any of the

tribes and therefore may proceed with funding under 36 CFR §800.3(c)(4). The applicant must comply with the Louisiana Unmarked Human Burial Sites Preservation Act (R.S. 8:671 et seq.) and the Inadvertent Discovery Clause, which can be found under Section 6.0 Conditions and Mitigation Measures

5.0 CUMULATIVE IMPACTS

According to the Council on Environmental Quality (CEQ) regulations, cumulative impacts represent the impact on the environment that results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions, regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time (40 CFR 1508.7). In accordance with NEPA and to the extent reasonable and practical, this EA considered the combined effect of the Proposed Action Alternative and other actions occurring or proposed in the vicinity of the proposed project site. FEMA has identified no other projects that, when added to the proposed project, would be expected to have a cumulative impact on the human and natural environment.

6.0 CONDITIONS AND MITIGATION MEASURES

Based upon the studies and consultations undertaken in this Supplemental EA, several conditions must be met and mitigation measures must be taken by the applicant prior to and during project implementation.

- All work shall comply with EPA guidelines for removal of contaminated soils. This will include testing for contaminants and determining the area of contamination. Excavation of contaminated soils and safe transport and proper disposal of contaminated soil in a regulated landfill. Excavated contamination area will be lined with a geo textile membrane and clean soil will be used to replace contaminated soils.
- A storm water pollution prevention plan should be prepared and BMP's for storm water management should be implemented to minimize any detrimental effects to water quality during project implementation.
- If during the course of work, archaeological artifacts (prehistoric or historic) or human remains are discovered, the applicant shall stop work in the vicinity of the discovery and take all reasonable measures to avoid or minimize harm to the finds. The applicant shall inform their Public Assistance contacts at FEMA, who will in turn contact FEMA Historic Preservation (HP) staff. The applicant will not proceed with work until FEMA HP completes consultation with the SHPO. In addition, if unmarked graves are present, compliance with the Louisiana Unmarked Human Burial Sites Preservation Act (R.S. 8:671 et seq.) is required. The applicant shall notify the law enforcement agency of the jurisdiction where the remains are located within twenty-four hours of the discovery. The applicant shall also notify FEMA and the Louisiana Division of Archaeology at 225-342-8170 within seventy-two hours of the discovery. Failure to comply with these stipulations may jeopardize receipt of FEMA funding.

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- To reduce potential short-term effects to air quality from construction related activities, the contractor should use Best Management Practices to reduce fugitive dust generation and diesel emissions.
 - All construction activities should be conducted in a safe manner in accordance with OSHA requirements.
 - If hazardous constituents are unexpectedly encountered in the project area during the proposed construction operations, appropriate measures for the proper assessment, remediation and management of the contamination should be initiated in accordance with applicable federal, state, and local regulations.
 - Appropriate measures to prevent, minimize, and control spills of hazardous materials should be taken, and any hazardous and non-hazardous wastes generated should be disposed of in accordance with applicable federal, state, and local requirements.
 - The applicant is responsible for acquiring any necessary permits prior to commencing construction at the proposed project site in accordance with applicable local, state, and federal regulations.

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Appendix A

HUD EA

**Environmental Assessment
for HUD-funded Proposals**

Recommended format per 24 CFR 58.36, revised February 2004
[Previously recommended EA formats are obsolete]

Project Identification: General Ogden Site
 1416 General Ogden Street
 New Orleans, Louisiana

Preparer: Andrew Hanson, W.D. Scott Group, Inc.

Responsible Entity: Housing Authority of New Orleans

Month/Year: March, 2007

Environmental Assessment

Responsible Entity:

City of New Orleans

[24 CFR 58.2(a)(7)]

Certifying Officer:

Jeffrey H. Riddel, Deputy Executive Administrator

[24 CFR 58.2(a)(2)]

Project Name:

General Ogden Site

Project Location:

General Ogden Street between Jeannette and Willow Streets

Estimated total project cost:

\$6.5 M

Grant Recipient:

Housing Authority of New Orleans

[24 CFR 58.2(a)(5)]

Recipient Address:

4100 Touro Street

New Orleans, LA 70122

Project Representative:

Judith Moran

Telephone Number:

504-670-3426

Conditions for Approval: (List all mitigation measures adopted by the responsible entity to eliminate or minimize adverse environmental impacts. These conditions must be included in project contracts and other relevant documents as requirements). [24 CFR 58.40(d), 40 CFR 1505.2(c)]

FINDING: [58.40(g)]

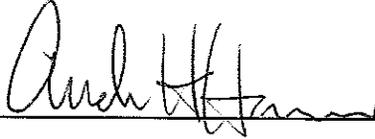
Finding of No Significant Impact

(The project will not result in a significant impact on the quality of the human environment)

Finding of Significant Impact

(The project may significantly affect the quality of the human environment)

Preparer Signature:



Date: March 12, 2007

Name/Title/Agency:

Andrew Hanson / Operations Manager / W. D. Scott Group, Inc.

RE Approving Official Signature:



Date: May 29, 2007

Name/Title/ Agency:

Anthony M. Faciane, Deputy Chief for Development, City of New Orleans
Office of Planning and Development

Statement of Purpose and Need for the Proposal: [40 CFR 1508.9(b)]

The General Ogden Site currently contains severely distressed housing units that have been vacant since early 2005 prior to Hurricane Katrina. Redevelopment will provide needed housing for low income households, contribute to area revitalization, improve safety and beautify the neighborhood. Low income households will be able to afford housing without fear of being priced out of the local rental market.

Description of the Proposal: Include all contemplated actions that are either geographically or functionally a composite part of the project, regardless of the source of funding. [24 CFR 58.32, 40 CFR 1508.25]

The General Ogden Site is being considered for the demolition of 8 buildings, the development of 22 units, of which 18 will be public housing/tax credit units and 4 will be tax credit/Section 8 Project Based units, and the disposition of the site to General Ogden LLC, an entity of HANO qualified to accept tax credits. The financing for the project includes approximately \$2.7M in Section 14 Capital Fund Program and other HANO funds for construction financing and approximately \$3.8M in tax credit equity.

Existing Conditions and Trends: Describe the existing conditions of the project area and its surroundings, and trends likely to continue in the absence of the project. [24 CFR 58.40(a)]

Surrounding the site is a mix of residential neighborhoods, unsubsidized privately owned rental property, commercial sites, single family homeownership units, vacant commercial buildings, and vacant rental property. The site itself is unoccupied and will remain so in the absence of the project.

Statutory Checklist

[24CFR §58.5]

Record the determinations made regarding each listed statute, executive order or regulation. Provide appropriate source documentation. [Note reviews or consultations completed as well as any applicable permits or approvals obtained or required. Note dates of contact or page references.] Provide compliance or consistency documentation. Attach additional material as appropriate. Note conditions, attenuation or mitigation measures required.

Factors	Determination and Compliance Documentation
Historic Preservation [36 CFR 800]	The SHPO states that there are No Historic Properties Affected: "Section 106 Review for General Ogden Housing Project and Adjacent Properties." Pam Breaux, State Historic Preservation Officer, December 1, 2006. (Attachment 1)
Floodplain Management [24 CFR 55, Executive Order 11988]	The project location is not within a 100 year floodplain according to NFIP Map 225203 0160 E (Attachment 2).
Wetlands Protection [Executive Order 11990]	The project does not involve new construction within or adjacent to wetlands, marshes, wet meadows, mud flats, or natural ponds per field observation (6/7/2004) and USDI Fish & Wildlife Service Map found at http://wetlandsfws.er.gov (Attachment 2).
Coastal Zone Management Act [Sections 307(c), (d)]	The project does not require a coastal use permit according to Phone interview with Tim Killeen, Coordinator for Support Services for the Eastern Region, Louisiana Department of Natural Resources. September 18, 2006.
Sole Source Aquifers [40 CFR 149]	The project is not located within a US EPA designated sole source aquifer watershed area according to Map of sole source aquifers in EPA region VI obtained from EPA website: www.epa.gov/OGWDW/swp/ssa/reg6.html (Attachment 3).
Endangered Species Act [50 CFR 402]	The Louisiana Department of Wildlife and Fisheries has determined that the project is not likely to threaten endangered species or critical habitats. Finding by Louisiana Department of Wildlife and Fisheries. (Attachment 4)
Wild and Scenic Rivers Act [Sections 7 (b), (c)]	The project is not located within one mile of a listed Wild and Scenic River according to US DOI NPS list found at www.nps.gov/rivers/wildriverlist.html (Attachment 5).
Air Quality [Clean Air Act, Sections 176 (c) and (d), and 40 CFR 6, 51, 93]	The project is located within an "attainment" area according to the "Criteria Pollutant Area Summary

	Report" USEPA. www.epa.gov/oar/oaqps/greenbk/anc12.html. March 2, 2006 (Attachment 7).
Farmland Protection Policy Act [7 CFR 658]	The project site does not include prime or unique farmland according to "Soil Survey of Orleans Parish, Louisiana." USDA, Soil Conservation Service. 1987.
Environmental Justice [Executive Order 12898]	The majority of the General Ogden Site area is considered a minority and low income population, the revitalization and redevelopment of the area will provide a net positive impact on the residents, as well as the surrounding community. While there are recognized temporary impacts such as increased construction traffic, there are clear, defined positive environmental impacts to the area. The data is summarized in an Environmental Justice document compiled by U. S. Risk., March, 2007. (Attachment 8)

HUD Environmental Standards

Factors	Determination and Compliance Documentation
Noise Abatement and Control [24 CFR 51 B]	A Noise Assessment Survey is not required, as the site is not in line-of-sight with an arterial roadway or train track.
Toxic/Hazardous/ Radioactive Materials, Contamination, Chemicals or Gases [24 CFR 58.5(i)(2)]	The subject and adjacent properties are free of hazardous materials, contamination, toxic chemicals, gasses and radioactive substances which could affect the health or safety of occupants or conflict with the intended use of the subject property according to Phase I Environmental Site Assessment; LA001025 – Scattered (General Ogden Street); Prepared by PPM Consultants; June 2006.
Siting of HUD-Assisted Projects near Hazardous Operations [24 CFR 51 C]	The project is located at an Acceptable Separation Distance from any above-ground explosive or flammable fuels or chemicals containers according to "Siting of HUD-Assisted Projects Near Hazardous Facilities."
Airport Clear Zones and Accident Potential Zones [24 CFR 51 D]	The project is not within an FAA-designated civilian airport Runway Clear Zone or Runway Protection Zone, or within a military airfield Clear Zone or Accident Potential Zone or Approach Protection Zone according to: Interviews with -Joel Jenkinson, Airport Operations Mgr, Lakefront Airport- Thomas Grantham, Architect

	Planner, Naval Air Station- Glen Whittaker, Operations Supervisor, Louis Armstrong, International Airport
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Environmental Assessment Checklist

[Environmental Review Guide HUD CPD 782, 24 CFR 58.40; Ref. 40 CFR 1508.8 & 1508.27]

Evaluate the significance of the effects of the proposal on the character, features and resources of the project area. Enter relevant base data and verifiable source documentation to support the finding. Then enter the appropriate impact code from the following list to make a determination of impact. **Impact Codes:** (1) - No impact anticipated; (2) - Potentially beneficial; (3) - Potentially adverse; (4) - Requires mitigation; (5) - Requires project modification. Note names, dates of contact, telephone numbers and page references. Attach additional material as appropriate. Note conditions or mitigation measures required.

Land Development	Code	Source or Documentation
Conformance with Comprehensive Plans and Zoning	1	Site is currently vacant and isolated from other communities. Surrounding area is residential and light commercial. The architect for the project, The SRF Group, will ensure all zoning is appropriate. Stephen Favorite, SRF Group, January, 2007.
Compatibility and Urban Impact	1	Site recently in use as public housing development. Surrounding area is residential and light commercial. Project will not alter current or preexisting use. The SRF Group will design structures compatible with the area. Stephen Favorite, SRF Group, January, 2007.
Slope	1	The site is relatively flat, and the Project will not significantly alter the slope. Stephen Favorite, SRF Group, January, 2007.
Erosion	1	During construction, best management practices (BMPs) will be utilized to minimize erosion and runoff. Typically, these requirements are mandated by the City of New Orleans prior to issuance of construction permits. Stephen Favorite, SRF Group, January, 2007.
Soil Suitability	1	Soil is typical for the region, Commerce series. The soils have moderate shrink-swell potential, which should be considered during construction. "Soil Survey of Orleans Parish", U.S. Department of Agriculture.
Hazards and Nuisances including Site Safety	1	No indications of hazards and nuisances on site. The Project will be fenced to restrict access for the local population during construction.
Energy Consumption	1	Compared to the existing structures, energy consumption for the Project is anticipated to decrease due to more efficient building materials and reduced number of units.
Noise - Contribution to Community Noise Levels	1	Project should have no significant contribution to noise levels. Construction will potentially produce noise issues, but construction BMPs and daily schedule will be used to minimize impact to the surrounding area. Construction traffic will be routed to the site using major arteries, most likely Tchoupitoulas Street. Typically, the city will specify traffic routes for construction sites in the permitting process.
Air Quality Effects of Ambient Air Quality on Project and Contribution to Community Pollution Levels	1	Project should have no significant contributions to air quality. Construction BMPs will be utilized to minimize dust and other air emissions during construction.
Environmental Design Visual Quality - Coherence, Diversity, Compatible Use and Scale	1	Project should have no significant contributions to environmental design of area. The land use is not changing. Stephen Favorite, SRF Group, January, 2007.

Socioeconomic	Code	Source or Documentation
Demographic Character Changes	2	The Project is expected to have a positive impact to the area. Post Katrina, the population of New Orleans is well below pre-Katrina numbers. The addition of affordable housing will allow more residents to return. The Project also specifies mixed income housing to moderate the economics of the area.
Displacement	1	Site currently vacant, no residents will be displaced. Judith Moran, HANO
Employment and Income Patterns	2	Project could potentially provide a positive impact in employment and income patterns with the additional mixed use housing.

Community Facilities and Services	Code	Source or Documentation
Educational Facilities	1	Pre-Katrina, there were sufficient educational facilities. Additional facilities are reoccupied as the population returns. The small number of units would not cause a major change to the area schools' enrollments. According to the New Orleans Public School website, all new students will be accommodated with appropriate classroom instruction and materials, and transportation will be provided for all students greater than one mile from their school. In the immediate area, James Johnson Elementary is located 4 blocks from the site, and offers k-8 instruction as of 8/2006. McMain High School is the closest High School, and is open as of 8/2006. www.nolapublicschools.net .
Commercial Facilities	1	Commercial facilities are readily accessible. The area was largely unaffected by Katrina related flood waters, so local commerce is relatively available. Nearby commercial corridors on Jefferson Highway/Claiborne Avenue, Oak Street, and S. Carrollton Avenue are open for business.
Health Care	1	Katrina related events have reduced the city capacity for medical care, but as the population returns, services return. Ochsner Foundation Hospital is less than one mile from the Site. Emergency health care will be readily available at the completion of the project. Interview with Medical Center of New Orleans officials. September 11, 2006.
Social Services	1	According to the New Orleans Neighborhoods Rebuilding Plan website (www.nolanrp.com), multiple churches and parks exist within the surrounding community. Representatives for the Association of Retarded Citizens, CASA, Catholic Charities, and the Children's Bureau were interviewed and confirmed that they would
Solid Waste	1	The existing municipal solid waste disposal system will be able to adequately service the proposed development. Construction debris will be managed by the contractor. Upon inhabitation, the residents would register with the authorized city solid waste management company for collection. According to the City of New Orleans website, www.cityofno.com , the site is in the current garbage collection route.
Waste Water	1	Existing municipal sewage systems will be able to adequately service the proposed development. Construction run off will be controlled by BMPs. Bryan Jones, New Orleans Sewerage and Water Board.
Storm Water	1	Existing municipal stormwater disposal systems will be able to adequately service the proposed development. Construction run

		off will be controlled by BMPs. Bryan Jones, New Orleans Sewerage and Water Board.
Water Supply	1	Existing municipal water supply systems will be able to adequately service the proposed development. The area received little damage to the existing infrastructure, and nearby facilities have sufficient utilities. According to the City of New Orleans website, www.cityofno.com , the site is in the current service area.
Public Safety - Police	1	Site within five minutes of police services. City of New Orleans website. The site is in Police Precinct 2.
- Fire	1	Site within five minutes of fire fighting protection. Interview with Officer on duty at Police Station. City of New Orleans website.
- Emergency Medical	1	Site within five minutes of emergency health care providers. Ochsner Hospital is located <1 mile from the site.
Open Space and Recreation - Open Space	1	The area is a typical residential neighborhood. Palmer Park, at the corner of Carrollton Avenue and Claiborne Avenue, is within walking distance.
- Recreation	1	The area is a typical residential neighborhood. Palmer Park, at the corner of Carrollton Avenue and Claiborne Avenue, is within walking distance.
- Cultural Facilities	1	Cultural Facilities exist in surrounding areas. Several churches are in the vicinity, and Audubon Park and Zoological Gardens, as well as Tulane and Loyola Universities, are nearby.
Transportation	1	Pre-Katrina, there were sufficient public transportation services. Additional transportation services become available as the population returns. According to the Regional Transit Authority's website, www.Regionaltransit.org , bus service is available in the immediate area (S. Carrollton at Oak Street).

Natural Features

Code

Source or Documentation

Water Resources	1	The project will have no significant impact on local water resources. There are no naturally occurring waterways in the vicinity with the exception of the Mississippi River, but the site is well insulated from the River by other structures.
Surface Water	1	The project will have no significant impact on local surface water. There are no naturally occurring surface water locations in the vicinity with the exception of the Mississippi River, but the site is well insulated from the River by other structures.
Unique Natural Features and Agricultural Lands	1	There is no evidence on site of unique or natural land features. The site is not located on agricultural lands.
Vegetation and Wildlife	1	The project will have no significant impact on vegetation and wildlife based on current and future conditions.

Other Factors

Code

Source or Documentation

Flood Disaster Protection Act [Flood Insurance] [§58.6(a)]	1	The site is not located in a Special Flood Hazard Area. NFIP Map 225203 0160 E (Attachment 2).
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Coastal Barrier Resources Act/ Coastal Barrier Improvement Act [§58.6(c)]	1	The site is not located in a Coastal Barrier Resource System (CBRS). NFIP Map 225203 0160 E (Attachment 2).
Airport Runway Clear Zone or Clear Zone Disclosure [§58.6(d)]	1	The project is not within an FAA-designated civilian airport Runway Clear Zone or Runway Protection Zone, or within a military airfield Clear Zone or Accident Potential Zone or Approach Protection Zone according to: Interviews with -Joel Jenkinson, Airport Operations Mgr, Lakefront Airport- Thomas Grantham, Architect Planner, Naval Air Station- Glen Whittaker, Operations Supervisor, Louis Armstrong, International Airport
Other Factors	1	No other relevant factors to be considered for this project.

Summary of Findings and Conclusions

ALTERNATIVES TO THE PROPOSED ACTION

Alternatives and Project Modifications Considered [24 CFR 58.40(e), Ref. 40 CFR 1508.9]

(Identify other reasonable courses of action that were considered and not selected such as other sites, design modifications, or other uses of the subject site. Describe the benefits and adverse impacts to the human environment of each alternative and the reasons for rejecting it.)

Locate Project Elsewhere: Adverse Impacts

A. The General Ogden Site has existed since 1969. The location is in the middle of a residential area, and without redeveloping the property, the area may be susceptible to blight.

B. Property suitable for low income housing is becoming scarce in New Orleans and the process of finding a new site capable of accommodating such a population would be both time consuming and costly.

Locate Project Elsewhere: Benefits

A. None apparent that are not already provided by the proposed location.

No Action Alternative [24 CFR 58.40(e)]

(Discuss the benefits and adverse impacts to the human environment of not implementing the preferred alternative).

No Action Alternative: Adverse Impacts

A. Without this project, the now-vacant buildings will remain vacant and dilapidated. Redevelopment of the site could help to strengthen the residential character of the surrounding neighborhood, and prevent the property from being blighted.

B. Without this project, the City will lose an opportunity to add a significant number of new housing units for a segment of low-income households in New Orleans. This will significantly hinder the City of New Orleans in its efforts to rebuild its conventional public housing sites.

No Action Alternative: Benefits

A. Project construction will temporarily affect surrounding area in terms of dust, noise, and traffic hindrances. These impacts would be avoided if the project is not built. Permit conditions will be imposed to mitigate these temporary negative impacts due to construction.

Mitigation Measures Recommended [24 CFR 58.40(d), 40 CFR 1508.20]

(Recommend feasible ways in which the proposal or its external factors should be modified in order to minimize adverse environmental impacts and restore or enhance environmental quality.)

None.

Additional Studies Performed

(Attach studies or summaries)

Phase I Environmental Site Assessment; LA001025 – Scattered (General Ogden Street); Prepared by PPM Consultants; June 2006. (Summary only)

List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]

1. Louisiana State Historic Preservation Office. State historic Preservation Officer, Laurel Wyckoff.
2. Federal Emergency Management Agency. www.fema.gov
3. United States Department of Wildlife and Fisheries. wetlandsfws.er.gov.
4. Louisiana Department of Natural Resources, Coastal Management Division. Tim Killeen, Coordinator for Support Services for the Eastern Region.
5. United States Environmental Protection Agency. www.epa.gov.
6. Louisiana Department of Wildlife and Fisheries.
7. National Park Service. www.nps.gov/rivers/wildriverlist.html.
8. "Criteria Pollutant Area Summary Report." USEPA. www.epa.gov/oar/oaqps/greenbk/and2.html. May 21, 2004.
9. "Soil Survey of Orleans Parish, Louisiana." United States Department of Agriculture, Soil Conservation Service. 1987.
10. Naval Air Station, Joint Reserve Base, New Orleans, Louisiana. Public Works Department. Thomas Grantham, Architect/Facilities Planner.
11. Lakefront Airport. Joel Jenkinson, Airport Operations Manager.
12. Louis Armstrong International Airport. Glen Whittaker, Operations Supervisor.
13. PPM Consultants
14. Housing Authority of New Orleans. Judith Moran.
15. New Orleans Police Department.
16. City of New Orleans website, www.cityofno.com.
17. Regional Transit Authority website, www.regionaltransit.org.
18. New Orleans Public Schools website, www.nolapublicschools.net.
19. Bryan Jones, New Orleans Sewerage and Water Board.

**ENVIRONMENTAL ASSESSMENT
CFR Part 58.36**

**General Ogden Site
1416 General Ogden Street et al
New Orleans, Louisiana**

LIST OF ATTACHMENTS

- 1. FINDING BY STATE HISTORIC PRESERVATION OFFICER**
- 2. NFIP MAP 225203**
- 3. USDI FISH & WIDLIFE SERVICE MAP**
- 4. USEPA DESIGNATED SOLE SOURCE AQUIFER MAP**
- 5. FINDING BY LOUSIANA DEPARTMENT OF WILDLIFE & FISHERIES**
- 6. USDOI LIST OF WILD AND SCENIC RIVERS**
- 7. USEPA CRITERIA POLLUTANT AREA SUMMARY REPORT**
- 8. ENVIRONMENTAL JUSTICE**

**ENVIRONMENTAL ASSESSMENT
CFR Part 58.36**

**General Ogden Site
1416 General Ogden Street et al
New Orleans, Louisiana**

ATTACHMENT 1

**FINDING BY STATE HISTORIC
PRESERVATION OFFICER**



MITCHELL J. LANDRIEU
LIEUTENANT GOVERNOR

State of Louisiana
OFFICE OF THE LIEUTENANT GOVERNOR
DEPARTMENT OF CULTURE, RECREATION & TOURISM
OFFICE OF CULTURAL DEVELOPMENT
DIVISION OF ARCHAEOLOGY

ANGÈLE DAVIS
SECRETARY
PAM BREAU
ASSISTANT SECRETARY

December 1, 2006

Mr. Andrew Hanson
Operations Manager
W.D. Scott Group, Inc.
1117 Wright Avenue
Gretna, LA 70056

Re: File # 2948
Section 106 Review for General Ogden Housing
Project and Adjacent Properties
Bounded by Monticello Avenue, Jeanette Street,
Eagle Street and Willow Street
New Orleans, Orleans Parish, LA

Dear Mr. Hanson:

Thank you for your letter of November 20, 2006, concerning the above-referenced properties. First, we would note that federal regulations place the ultimate responsibility for determining National Register eligibility on the federal agency conducting the undertaking, and the role of the State Historic Preservation Officer's (SHPO) is to consult with the federal agency. That said, it is our opinion that the General Ogden Housing Project and adjacent properties do not meet the criteria for listing in the National Register of Historic Places and their demolition would not constitute an adverse effect on an historic property. Please note that at this point, we cannot speak to the potential of possible adverse effects from the buildings that will be constructed, without seeing the plans.

However, we are recommending archaeological monitoring during the re-development of this property, due to the prospect that ground disturbance at the site could uncover archaeological features below the surface. As we trust, HUD is aware, such monitoring involves the presence of an on-site archaeologist. We have included a copy of our contracting archaeologists list for your convenience.

Mr. Andrew Hanson

December 1, 2006

Page 2

You ask in your letter if the properties' Area of Potential Effects (APE) includes a historic district or property. It is up to the federal agency to define the APE for each undertaking and identify any historic properties within the APE. We can say that, based on the street boundaries that are referenced in your letter, the General Ogden Housing Project and Adjacent Properties are located within the boundaries of the Carrollton National Register District.

If you have any questions, please contact Mike Varnado in the Division of Historic Preservation at (225) 342-8160 or Cheraki Williams in the Division of Archaeology at (225) 342-8170.

Sincerely,



Pam Breaux
State Historic Preservation Officer

PB:MV:CW:s

Encl.: as stated

Cc: Charlene Vaughn, ACHP
David Blick, HUD
Roma Campanile, HUD
Judith Moran, HANO

**ENVIRONMENTAL ASSESSMENT
CFR Part 58.36**

**General Ogden Site
1416 General Ogden Street et al
New Orleans, Louisiana**

ATTACHMENT 2

NFIP MAP 22503

**ENVIRONMENTAL ASSESSMENT
CFR Part 58.36**

**General Ogden Site
1416 General Ogden Street et al
New Orleans, Louisiana**

ATTACHMENT 3

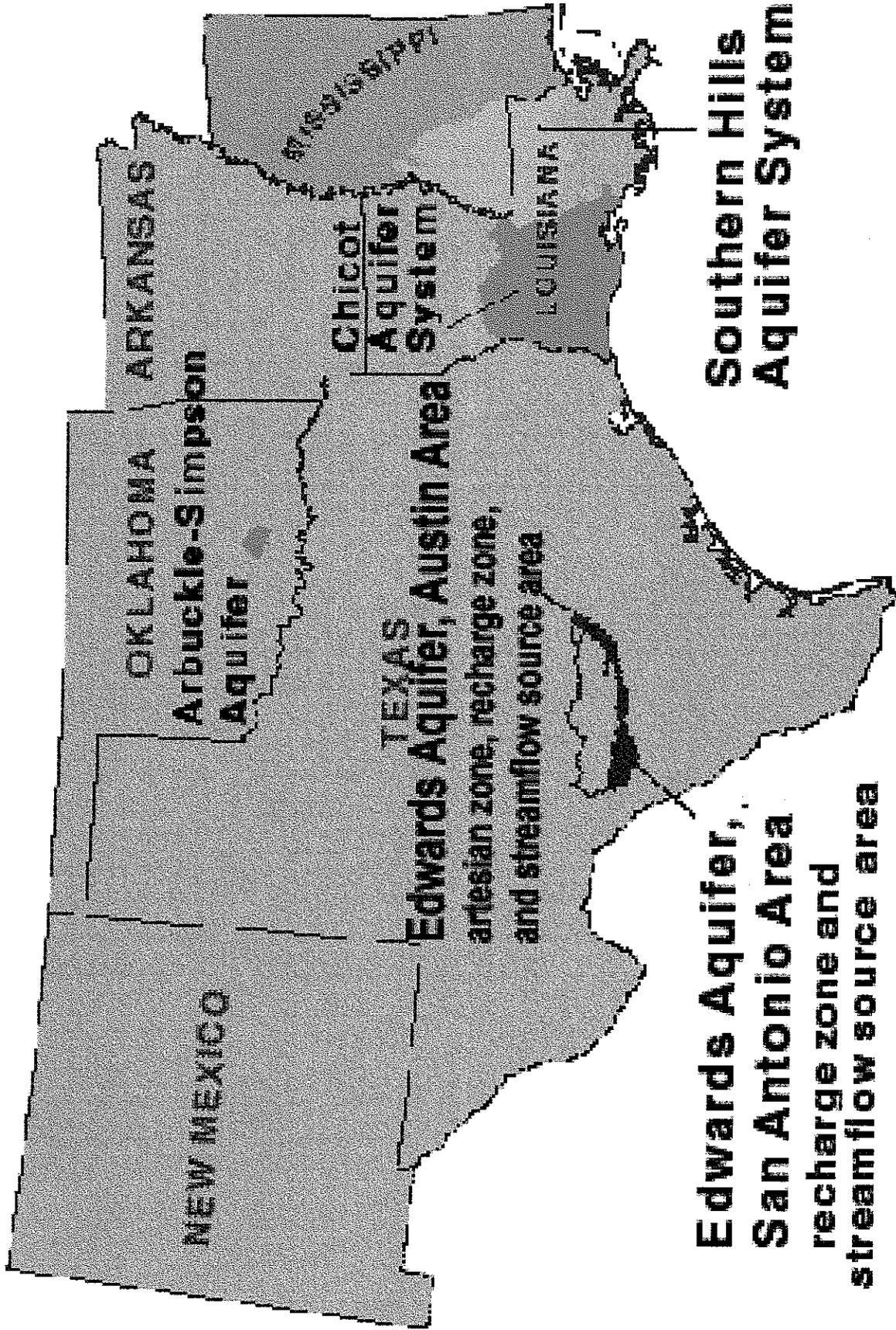
**USDI FISH & WILDLIFE
SERVICE MAP**

**ENVIRONMENTAL ASSESSMENT
CFR Part 58.36**

**General Ogden Site
1416 General Ogden Street et al
New Orleans, Louisiana**

ATTACHMENT 4

**USEPA DESIGNATED SOLE SOURCE
AQUIFER MAP**



**ENVIRONMENTAL ASSESSMENT
CFR Part 58.36**

**General Ogden Site
1416 General Ogden Street et al
New Orleans, Louisiana**

ATTACHMENT 5

**FINDINGS BY LOUISIANA DEPARTMENT
OF
WILDLIFE & FISHERIES**

**ENVIRONMENTAL ASSESSMENT
CFR Part 58.36**

**General Ogden Site
1416 General Ogden Street et al
New Orleans, Louisiana**

ATTACHMENT 6

USDOI LIST OF WILD AND SCENIC RIVERS

River Mileage Classifications for Components of the National Wild & Scenic Rivers System
January 2002

To print this table, set your computer and printer to print landscape.

River Present Units in the National System	Administering Agency	Miles by Classification				Total Miles
		Wild	Scenic	Rec'l		
Middle Fork Clearwater, Idaho (P.L. 90-542 -- October 2, 1968)	Forest Service	54.0	--	131.0	185.0	
Eleven Point, Missouri (P.L. 90-542 -- October 2, 1968)	Forest Service	--	44.4	--	44.4	
Feather, California (P.L. 90-542 -- October 2, 1968)	Forest Service	32.9	9.7	35.0	77.6	
Rio Grande, New Mexico (P.L. 90-542 -- October 2, 1968)	Forest Service and Bureau of Land Mgt.	53.2	--	2.5	55.7	
Rio Grande, New Mexico (P.L. 103-242 -- May 4, 1994)	Bureau of Land Mgt.	--	12.5	--	12.5	
Rio Grande, Texas (P.L. 95-625 -- November 10, 1978)	National Park Service	95.2	96.0	--	191.2	
Rogue, Oregon (P.L. 90-542 -- October 2, 1968)	Forest Service Bureau of Land Mgt.	13.0 20.6	7.5 --	17.0 26.4	37.5 47.0	
St. Croix, Minnesota & Wisconsin (P.L. 90-542 -- October 2, 1968)	National Park Service	--	181.0	19.0	200.0	
St. Croix (Lower), Minnesota & Wisconsin (P.L. 92-560 -- October 25, 1972)	National Park Service	--	12.0	15.0	27.0	
St. Croix (Lower), Minnesota & Wisconsin (Secretarial Designation -- June 17, 1976)	National Park Service	--	--	25.0	25.0	

Middle Fork Salmon, Idaho (P.L. 90-542 -- October 2, 1968)	Forest Service	103.0	--	1.0	104.0
Salmon, Idaho (P.L. 96-312 -- July 23, 1980)	Forest Service	79.0	--	46.0	125.0
Wolf, Wisconsin (P.L. 90-542 -- October 2, 1968)	National Park Service	--	24.0	--	24.0
Allagash Wilderness Waterway, Maine (Secretarial Designation -- July 19, 1970)	State of Maine	92.5	--	--	92.5
Little Miami, Ohio (Secretarial Designation -- August 20, 1973)	State of Ohio	--	18.0	48.0	66.0
Little Miami, Ohio (Secretarial Designation -- January 28, 1980)	State of Ohio	--	--	28.0	28.0
Chattooga, North and South Carolina, Georgia (P.L. 93-279 -- May 10, 1974)	Forest Service	39.8	2.5	14.6	56.9
Little Beaver, Ohio (Secretarial Designation -- October 23, 1975)	State of Ohio	--	33.0	--	33.0
Snake, Idaho & Oregon (P.L. 94-199 -- December 31, 1975)	Forest Service	32.5	34.4	--	66.9
Rapid, Idaho (P.L. 94-199 -- December 31, 1975)	Forest Service	26.8	--	--	26.8
New, North Carolina (Secretarial Designation -- April 13, 1976)	State of North Carolina	--	26.5	--	26.5
Missouri, Montana (P.L. 94-486 -- October 12, 1976)	Bureau of Land Mgt.	64.0	26.0	59.0	149.0
Missouri, Nebraska & South Dakota (P.L. 95-625 -- November 10, 1978)	National Park Service	--	--	59.0	59.0
Missouri, Nebraska & South Dakota (P.L. 102-50 -- May 24, 1991)	National Park Service	--	--	39.0	39.0

Flathead, Montana (P.L. 94-486 -- October 12, 1976)	Forest Service and National Park Service	97.9	49.5	71.6	219.0
Obed, Tennessee (P.L. 94-486 -- October 12, 1976)	National Park Service	43.3	2.0	--	45.3
Pere Marquette, Michigan (P.L. 95-625 -- November 10, 1978)	Forest Service	--	66.4	--	66.4
Skagit, Washington (P.L. 95-625 -- November 10, 1978)	Forest Service	--	99.0	58.5	157.5
Delaware (Upper), New York & Pennsylvania (P.L. 95-625 -- November 10, 1978)	National Park Service	--	23.1	50.3	73.4
Delaware (Middle), New Jersey & Pennsylvania (P.L. 95-625 -- November 10, 1978)	National Park Service	--	35.0	--	35.0
Delaware (Lower), New Jersey & Pennsylvania (P.L. 106-418 -- November 1, 2000)	National Park Service and Local Government	--	25.4	41.9	67.3
North Fork American, California (P.L. 95-625 -- November 10, 1978)	Forest Service Bureau of Land Mgt.	26.3 12.0	-- --	-- --	26.3 12.0
American (Lower), California (Secretarial Designation -- January 19, 1981)	State of California	--	--	23.0	23.0
Saint Joe, Idaho (P.L. 95-625 -- November 10, 1978)	Forest Service	26.6	--	39.7	66.3
Alagnak, Alaska (P.L. 96-487 -- December 2, 1980)	National Park Service	67.0	--	--	67.0
Alatna, Alaska (P.L. 96-487 -- December 2, 1980)	National Park Service	83.0	--	--	83.0
Aniakchak, Alaska (P.L. 96-487 -- December 2, 1980)	National Park Service	63.0	--	--	63.0
Charley, Alaska	National Park Service	208.0	--	--	208.0

(P.L. 96-487 -- December 2, 1980)								
Chilikadrotna, Alaska (P.L. 96-487 -- December 2, 1980)	National Park Service	11.0	--	--	11.0	--	11.0	
John, Alaska (P.L. 96-487 -- December 2, 1980)	National Park Service	52.0	--	--	52.0	--	52.0	
Kobuk, Alaska (P.L. 96-487 -- December 2, 1980)	National Park Service	110.0	--	--	110.0	--	110.0	
Mulchatna, Alaska (P.L. 96-487 -- December 2, 1980)	National Park Service	24.0	--	--	24.0	--	24.0	
North Fork Koyukuk, Alaska (P.L. 96-487 -- December 2, 1980)	National Park Service	102.0	--	--	102.0	--	102.0	
Noatak, Alaska (P.L. 96-487 -- December 2, 1980)	National Park Service	330.0	--	--	330.0	--	330.0	
Salmon, Alaska (P.L. 96-487 -- December 2, 1980)	National Park Service	70.0	--	--	70.0	--	70.0	
Tinayguk, Alaska (P.L. 96-487 -- December 2, 1980)	National Park Service	44.0	--	--	44.0	--	44.0	
Tlikakila, Alaska (P.L. 96-487 -- December 2, 1980)	National Park Service	51.0	--	--	51.0	--	51.0	
Andreafsky, Alaska (P.L. 96-487 -- December 2, 1980)	Fish and Wildlife Service	262.0	--	--	262.0	--	262.0	
Ivishak, Alaska (P.L. 96-487 -- December 2, 1980)	Fish and Wildlife Service	80.0	--	--	80.0	--	80.0	
Nowitna, Alaska (P.L. 96-487 -- December 2, 1980)	Fish and Wildlife Service	225.0	--	--	225.0	--	225.0	
Selawik, Alaska (P.L. 96-487 -- December 2, 1980)	Fish and Wildlife Service	160.0	--	--	160.0	--	160.0	

Sheenjek, Alaska (P.L. 96-487 -- December 2, 1980)	Fish and Wildlife Service	160.0	--	--	--	160.0
Wind, Alaska (P.L. 96-487 -- December 2, 1980)	Fish and Wildlife Service	140.0	--	--	--	140.0
Beaver Creek, Alaska (P.L. 96-487 -- December 2, 1980)	Fish and Wildlife Service Bureau of Land Mgt.	16.0 111.0	--	--	--	16.0 111.0
Birch Creek, Alaska (P.L. 96-487 -- December 2, 1980)	Bureau of Land Mgt.	126.0	--	--	--	126.0
Delta, Alaska (P.L. 96-487 -- December 2, 1980)	Bureau of Land Mgt.	20.0	24.0	18.0	62.0	
Fortymile, Alaska (P.L. 96-487 -- December 2, 1980)	Bureau of Land Mgt.	179.0	203.0	10.0	392.0	
Gulkana, Alaska (P.L. 96-487 -- December 2, 1980)	Bureau of Land Mgt.	181.0	--	--	181.0	
Unalakleet, Alaska (P.L. 96-487 -- December 2, 1980)	Bureau of Land Mgt.	80.0	--	--	80.0	
Klamath, California (Secretarial Designation -- January 19, 1981)	State of California Forest Service Bureau of Land Mgt. Hoopa Valley Reservation National Park Service	-- 12.0 -- -- --	3.0 21.0 -- -- --	41.0 177.5 1.5 29.0 1.0	44.0 210.5 1.5 29.0 1.0	
Klamath, Oregon (Secretarial Designation -- September 22, 1994)	State of Oregon and Bureau of Land Mgt.	--	11.0	--	11.0	
Trinity, California (Secretarial Designation -- January 19, 1981)	State of California Forest Service Bureau of Land Mgt. Hoopa Valley Reservation	2.0 42.0 -- --	11.0 22.0 -- 6.0	24.0 71.0 17.0 8.0	37.0 135.0 17.0 14.0	
Eel, California	State of California	36.0	22.5	250.5	309.0	

(Secretarial Designation -- January 19, 1981)	Forest Service Bureau of Land Mgt. Round Valley Reservation	35.0 21.0 5.0	-- 4.5 1.0	-- 6.5 16.0	35.0 32.0 22.0
Smith, California (Secretarial Designation -- January 19, 1981) (P.L. 101-612 -- November 16, 1990)	State of California Forest Service	-- 78.0	0.5 30.5	28.5 187.9	29.0 296.4
Verde, Arizona (P.L. 98-406 -- August 28, 1984)	Forest Service	22.2	18.3	--	40.5
Tuolumne, California (P.L. 98-425 -- September 28, 1984)	Forest Service National Park Service Bureau of Land Mgt.	7.0 37.0 3.0	6.0 17.0 --	13.0 -- --	26.0 54.0 3.0
Au Sable, Michigan (P.L. 98-444 -- October 4, 1984)	Forest Service	--	23.0	--	23.0
Owyhee, Oregon (P.L. 98-494 -- October 19, 1984)	Bureau of Land Mgt.	120.0	--	--	120.0
Illinois, Oregon (P.L. 98-494 -- October 19, 1984)	Forest Service	28.7	17.9	3.8	50.4
Loxahatchee, Florida (Secretarial Designation -- May 17, 1985)	State of Florida	1.3	5.8	0.5	7.6
Horsepasture, North Carolina (P.L. 99-530 -- October 26, 1986)	Forest Service	--	3.6	0.6	4.2
Cache la Poudre, Colorado (P.L. 99-590 -- October 30, 1986)	Forest Service National Park Service	18.0 12.0	-- --	46.0 --	64.0 12.0
Black Creek, Mississippi (P.L. 99-590 -- October 30, 1986)	Forest Service	--	21.0	--	21.0
Saline Bayou, Louisiana (P.L. 99-590 -- October 30, 1986)	Forest Service	--	19.0	--	19.0
Khickitat, Washington	Forest Service	--	--	10.0	10.0

(P.L. 99-663 -- November 17, 1986)										
White Salmon, Washington (P.L. 99-663 -- November 17, 1986)	Forest Service	--	9.0	--						9.0
Merced, California (P.L. 100-149 -- November 2, 1987) (P.L. 102-432 -- October 23, 1992)	Forest Service National Park Service Bureau of Land Mgt.	15.0 53.0 3.0	2.0 14.0 --	12.5 14.0 9.0						29.5 81.0 12.0
Kings, California (P.L. 100-150 -- November 3, 1987)	Forest Service National Park Service	16.5 49.0	-- --	9.0 6.5						25.5 55.5
Kern, California (P.L. 100-174 -- November 24, 1987)	Forest Service National Park Service	96.1 27.0	20.9 --	7.0 --						124.0 27.0
Wildcat Brook, New Hampshire (P.L. 100-554 -- October 28, 1988)	Forest Service	--	13.5	1.0						14.5
Sipsey Fork West Fork, Alabama (P.L. 100-547 -- October 28, 1988)	Forest Service	36.4	25.0	--						61.4
Big Marsh Creek, Oregon (P.L. 100-557 -- October 28, 1988)	Forest Service	--	--	15.0						15.0
Chetco, Oregon (P.L. 100-557 -- October 28, 1988)	Forest Service	25.5	8.0	11.0						44.5
Clackamas, Oregon (P.L. 100-557 -- October 28, 1988)	Forest Service	--	20.0	27.0						47.0
Crescent Creek, Oregon (P.L. 100-557 -- October 28, 1988)	Forest Service	--	--	10.0						10.0
Crooked, Oregon (P.L. 100-557 -- October 28, 1988)	Bureau of Land Mgt.	--	--	15.0						15.0
Deschutes, Oregon (P.L. 100-557 -- October 28, 1988)	Forest Service Bureau of Land Mgt.	-- --	11.0 19.0	43.4 100.0						54.4 119.0
Donner und Blitzen, Oregon (P.L. 100-557 -- October 28, 1988)	Bureau of Land Mgt.	72.7	--	--						72.7

Donner und Blitzen, Oregon (P.L. 106-399 -- October 30, 2000)	Bureau of Land Mgt.	14.8	--	--	--	14.8
Eagle Creek, Oregon (P.L. 100-557 -- October 28, 1988)	Forest Service	4.0	6.0	17.0	27.0	
Elk, Oregon (P.L. 100-557 -- October 28, 1988)	Forest Service	2.0	--	17.0	19.0	
Grande Ronde, Oregon (P.L. 100-557 -- October 28, 1988)	Forest Service Bureau of Land Mgt.	17.4 9.0	-- --	1.5 15.9	18.9 24.9	
Imnaha, Oregon (P.L. 100-557 -- October 28, 1988)	Forest Service	15.0	4.0	58.0	77.0	
John Day, Oregon (P.L. 100-557 -- October 28, 1988)	Bureau of Land Mgt.	--	--	147.5	147.5	
Joseph Creek, Oregon (P.L. 100-557 -- October 28, 1988)	Forest Service	8.6	--	--	8.6	
Little Deschutes, Oregon (P.L. 100-557 -- October 28, 1988)	Forest Service	--	--	12.0	12.0	
Lostine, Oregon (P.L. 100-557 -- October 28, 1988)	Forest Service	5.0	--	11.0	16.0	
Malheur, Oregon (P.L. 100-557 -- October 28, 1988)	Forest Service	--	7.0	6.7	13.7	
McKenzie, Oregon (P.L. 100-557 -- October 28, 1988)	Forest Service	--	--	12.7	12.7	
Metolius, Oregon (P.L. 100-557 -- October 28, 1988)	Forest Service	--	17.1	11.5	28.6	
Minam, Oregon (P.L. 100-557 -- October 28, 1988)	Forest Service	39.0	--	--	39.0	
North Fork Crooked, Oregon (P.L. 100-557 -- October 28, 1988)	Forest Service Bureau of Land Mgt.	-- 11.9	6.3 2.2	9.1 4.7	15.4 18.8	

North Fork John Day, Oregon (P.L. 100-557 -- October 28, 1988)	Forest Service	27.8	10.5	15.8	54.1
North Fork Malheur, Oregon (P.L. 100-557 -- October 28, 1988)	Forest Service	--	25.5	--	25.5
North Fork Middle Fork Willamette, Oregon (P.L. 100-557 -- October 28, 1988)	Forest Service	8.8	6.5	27.0	42.3
North Fork Owyhee, Oregon (P.L. 100-557 -- October 28, 1988)	Bureau of Land Mgt.	9.6	--	--	9.6
North Fork Smith, Oregon (P.L. 100-557 -- October 28, 1988)	Forest Service	8.5	4.5	--	13.0
North Fork Sprague, Oregon (P.L. 100-557 -- October 28, 1988)	Forest Service	--	15.0	--	15.0
North Powder, Oregon (P.L. 100-557 -- October 28, 1988)	Forest Service	--	6.0	--	6.0
North Umpqua, Oregon (P.L. 100-557 -- October 28, 1988)	Forest Service Bureau of Land Mgt.	-- --	-- --	25.4 8.4	25.4 8.4
Powder, Oregon (P.L. 100-557 -- October 28, 1988)	Bureau of Land Mgt.	--	11.7	--	11.7
Quartzville Creek, Oregon (P.L. 100-557 -- October 28, 1988)	Bureau of Land Mgt.	--	--	12.0	12.0
Roaring, Oregon (P.L. 100-557 -- October 28, 1988)	Forest Service	13.5	--	0.2	13.7
Salmon, Oregon (P.L. 100-557 -- October 28, 1988)	Forest Service Bureau of Land Mgt.	15.0 --	-- 4.8	10.5 3.2	25.5 8.0
Sandy, Oregon (P.L. 100-557 -- October 28, 1988)	Forest Service Bureau of Land Mgt.	4.5 --	-- 3.8	7.9 8.7	12.4 12.5
South Fork John Day, Oregon (P.L. 100-557 -- October 28, 1988)	Bureau of Land Mgt.	--	--	47.0	47.0

Squaw Creek, Oregon (P.L. 100-557 -- October 28, 1988)	Forest Service	6.6	8.8	--	15.4
Sycan, Oregon (P.L. 100-557 -- October 28, 1988)	Forest Service	--	50.4	8.6	59.0
Upper Rogue, Oregon (P.L. 100-557 -- October 28, 1988)	Forest Service	6.1	34.2	--	40.3
Wenaha, Oregon (P.L. 100-557 -- October 28, 1988)	Forest Service	18.7	2.7	0.2	21.6
West Little Owyhee, Oregon (P.L. 100-557 -- October 28, 1988)	Bureau of Land Mgt.	57.6	--	--	57.6
White, Oregon (P.L. 100-557 -- October 28, 1988)	Forest Service Bureau of Land Mgt.	-- --	6.5 17.8	15.6 6.9	22.1 24.7
Bluestone, West Virginia (P.L. 100-534 -- October 26, 1988)	National Park Service	--	10.0	--	10.0
Rio Chama, New Mexico (P.L. 100-633 -- November 7, 1988)	Forest Service and Bureau of Land Mgt.	19.8	4.9	--	24.7
Middle Fork Vermilion, Illinois (Secretarial Designation -- May 11, 1989)	State of Illinois	--	17.1	--	17.1
East Fork Jemez, New Mexico (P.L. 101-306 -- June 6, 1990)	Forest Service	4.0	5.0	2.0	11.0
Pecos, New Mexico (P.L. 101-306 -- June 6, 1990)	Forest Service	13.5	--	7.0	20.5
Clarks Fork Yellowstone, Wyoming (P.L. 101-628 -- November 28, 1990)	Forest Service	20.5	--	--	20.5
Niobrara, Nebraska (P.L. 102-50 -- May 24, 1991)	National Park Service Fish and Wildlife Service	-- --	68.0 8.0	28.0 --	96.0 8.0
Bear Creek, Michigan (P.L. 102-249 -- March 3, 1992)	Forest Service	--	6.5	--	6.5

Black, Michigan (P.L. 102-249 -- March 3, 1992)	Forest Service	--	14.0	--	14.0	--	14.0
Carp, Michigan (P.L. 102-249 -- March 3, 1992)	Forest Service	12.4	9.3	6.1	27.8		
Indian, Michigan (P.L. 102-249 -- March 3, 1992)	Forest Service	--	12.0	39.0	51.0		
Manistee, Michigan (P.L. 102-249 -- March 3, 1992)	Forest Service	--	--	26.0	26.0		
Ontonagon, Michigan (P.L. 102-249 -- March 3, 1992)	Forest Service	42.9	41.0	73.5	157.4		
Paint, Michigan (P.L. 102-249 -- March 3, 1992)	Forest Service	--	--	51.0	51.0		
Pine, Michigan (P.L. 102-249 -- March 3, 1992)	Forest Service	--	25.0	--	25.0		
Presque Isle, Michigan (P.L. 102-249 -- March 3, 1992)	Forest Service	--	19.0	38.0	57.0		
Sturgeon, Michigan (Hiawatha National Forest) (P.L. 102-249 -- March 3, 1992)	Forest Service	--	21.7	22.2	43.9		
Sturgeon, Michigan (Ottawa National Forest) (P.L. 102-249 -- March 3, 1992)	Forest Service	16.5	8.5	--	25.0		
Tahquamenon (East Branch), Michigan (P.L. 102-249 -- March 3, 1992)	Forest Service	3.2	--	10.0	13.2		
Whitefish, Michigan (P.L. 102-249 -- March 3, 1992)	Forest Service	--	31.5	2.1	33.6		
Yellow Dog, Michigan (P.L. 102-249 -- March 3, 1992)	Forest Service	4.0	--	--	4.0		
Allegheny, Pennsylvania	Forest Service	--	--	86.6	86.6		

(P.L. 102-271 -- April 20, 1992)								
Big Piney Creek, Arkansas (P.L. 102-275 -- April 22, 1992)	Forest Service	--	45.2	--	45.2	--	45.2	45.2
Buffalo, Arkansas (P.L. 102-275 -- April 22, 1992)	Forest Service	9.4	6.4	--	6.4	--	6.4	15.8
Cossatot, Arkansas (P.L. 102-275 -- April 22, 1992) (Secretarial Designation -- February 2, 1994)	Forest Service Army Corps of Engineers State of Arkansas	-- -- --	11.3 4.6 10.7	4.2	11.3 4.6 10.7	-- -- --	15.5 4.6 10.7	15.5 4.6 10.7
Hurricane Creek, Arkansas (P.L. 102-275 -- April 22, 1992)	Forest Service	2.4	13.1	--	13.1	--	13.1	15.5
Little Missouri, Arkansas (P.L. 102-275 -- April 22, 1992)	Forest Service	4.4	11.3	--	11.3	--	11.3	15.7
Mulberry, Arkansas (P.L. 102-275 -- April 22, 1992)	Forest Service	--	19.4	36.6	19.4	--	19.4	56.0
North Sylamore Creek, Arkansas (P.L. 102-275 -- April 22, 1992)	Forest Service	--	14.5	--	14.5	--	14.5	14.5
Richland Creek, Arkansas (P.L. 102-275 -- April 22, 1992)	Forest Service	5.3	11.2	--	11.2	--	11.2	16.5
Sespe Creek, California (P.L. 102-301 -- June 19, 1992)	Forest Service	27.5	4.0	--	4.0	--	4.0	31.5
Sisquoc, California (P.L. 102-301 -- June 19, 1992)	Forest Service	33.0	--	--	--	--	--	33.0
Big Sur, California (P.L. 102-301 -- June 19, 1992)	Forest Service	19.5	--	--	--	--	--	19.5
Great Egg Harbor, New Jersey (P.L. 102-536 -- October 27, 1992)	National Park Service	--	30.6	98.4	30.6	--	30.6	129.0
Westfield, Massachusetts (Secretarial Designation -- November 2, 1993)	State of Massachusetts	--	18.9	24.4	18.9	--	18.9	43.3

Westfield, Massachusetts (Secretarial Designation -- October 29, 2004)	State of Massachusetts	2.6	24.0	8.2	34.8
Maurice, New Jersey (P.L. 103-162 -- December 1, 1993)	National Park Service	--	28.9	6.5	35.4
Red, Kentucky (P.L. 103-170 -- December 2, 1993)	Forest Service	9.1	--	10.3	19.4
Big and Little Darby Creeks, Ohio (Secretarial Designation -- March 10, 1994)	State of Ohio	--	85.9	--	85.9
Farmington (West Branch), Connecticut (P.L. 103-313 -- August 26, 1994)	National Park Service and State of Connecticut and Local Government	--	--	14.0	14.0
Wallowa, Oregon (Secretarial Designation -- July 23, 1996)	State of Oregon and Bureau of Land Mgt.	--	--	10.0	10.0
Clarion, Pennsylvania (P.L. 104-314 -- October 19, 1996)	Forest Service	--	17.1	34.6	51.7
Lamprey, New Hampshire (P.L. 104-333 -- November 12, 1996)	National Park Service and Local Government	--	--	11.5	11.5
Lamprey, New Hampshire (P.L. 106-192 -- May 2, 2000)	National Park Service and Local Government	--	--	12.0	12.0
Elkhorn Creek, Oregon (P.L. 104-333 -- November 12, 1996)	Forest Service Bureau of Land Mgt.	5.8 --	-- 0.6	-- --	5.8 0.6
Lumber, North Carolina (Secretarial Designation -- September 28, 1998)	State of North Carolina	--	60.0	21.0	81.0
Sudbury, Assabet, Concord, Massachusetts (P.L. 106-20 -- April 9, 1999)	National Park Service and State of Massachusetts and Local Government	--	14.9	14.1	29.0
Wilson Creek, North Carolina	Forest Service	4.6	2.9	15.8	23.3

(P.L. 106-261 -- August 18, 2000)								
Wekiva, Florida (P.L. 106-299 -- October 13, 2000)	National Park Service and State of Florida	31.4	2.1	8.1	41.6			
White Clay Creek, Delaware & Pennsylvania (P.L. 106-357 -- October 24, 2000)	National Park Service and Local Government	--	24.0	166.0	190.0			
Wildhorse & Kiger Creeks, Oregon (P.L. 106-399 -- October 30, 2000)	Bureau of Land Mgt.	13.9	--	--	13.9			
Rio Mameyes (P.L. 107-365 -- December 19, 2002)	Forest Service	2.1	1.4	1.0	4.5			
Rio de la Mina (P.L. 107-365 -- December 19, 2002)	Forest Service	--	1.2	0.9	2.1			
Rio Icacos (P.L. 107-365 -- December 19, 2002)	Forest Service	--	2.3	--	2.3			
TOTALS		5,353.2	2,481.2	3,503.3	11,337.7			

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ATTACHMENT 7

**USEPA CRITERIA POLLUTANT
AREA SUMMARY REPORT**



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Criteria Pollutant Area Summary Report

As of March 02, 2006

State: Simple Name Pollutant	Nonattainment Area Name	Population (1000s)	Number of Counties	Classification
AK: Anchorage				
PM-10	Eagle River, AK	195	1	Moderate
AK: Juneau				
PM-10	Juneau, AK	14	1	Moderate
AL: Birmingham				
8-Hr Ozone	Birmingham, AL	805	2	Subpart 1
PM-2.5	Birmingham, AL	808	3	Nonattainment
AZ: Ajo				
PM-10	Ajo (Pima County), AZ	8	1	Moderate
AZ: Douglas (Cochise County)				
PM-10	Douglas (Cochise County), AZ	16	1	Moderate
SO2	Douglas (Cochise County), AZ	16	1	Primary
AZ: Hayden/Miami				
PM-10	Hayden/Miami, AZ	4	2	Moderate
SO2	Hayden (Pinal County), AZ	2	1	Primary
SO2	Miami (Gila County), AZ	2	1	Primary
AZ: Nogales				
PM-10	Nogales, AZ	25	1	Moderate
AZ: Paul Spur (Cochise County)				
PM-10	Paul Spur, AZ	1	1	Moderate
AZ: Phoenix-Mesa				
8-Hr Ozone	Phoenix-Mesa, AZ	3,086	2	Subpart 1
PM-10	Phoenix, AZ	3,112	2	Serious
AZ: Rillito (Pima County)				
PM-10	Rillito, AZ	1	1	Moderate
AZ: San Manuel				
SO2	San Manuel (Pinal County), AZ	8	1	Primary
AZ: Yuma				

PM-10	Yuma, AZ	82	1	Moderate
CA: Amador and Calaveras Cos (Central Mtn),	Amador and Calaveras Cos (Central Mtn), CA			
8-Hr Ozone		76	2	Subpart 1
CA: Chico	Chico, CA	203	1	Subpart 1
8-Hr Ozone				
CA: Imperial County	Imperial Co, CA	142	1	Marginal
8-Hr Ozone	Imperial Valley, CA	120	1	Serious
PM-10				
CA: Kern Co (Eastern Kern)	Kern Co (Eastern Kern), CA	99	1	Subpart 1
8-Hr Ozone				
CA: Los Angeles-San Bernardino Cos(W Mojave)	Los Angeles-San Bernardino Cos(W Mojave),CA	656	2	Moderate
8-Hr Ozone	Coachella Valley, CA	182	1	Serious
PM-10	San Bernardino Co, CA	199	1	Moderate
PM-10				
CA: Los Angeles-South Coast Air Basin	Los Angeles South Coast Air Basin, CA	14,594	4	Serious
Carbon Monoxide	Los Angeles South Coast Air Basin, CA	14,594	4	Severe 17
8-Hr Ozone	Los Angeles South Coast Air Basin, CA	14,594	4	Serious
PM-10	Los Angeles-South Coast Air Basin, CA	14,594	4	Nonattainment
PM-2.5				
CA: Mariposa and Tuolumne Cos (Southern Mtn)	Mariposa and Tuolumne Cos (Southern Mtn),CA	72	2	Subpart 1
8-Hr Ozone				
CA: Mono County	Mono Basin, CA	0	1	Moderate
PM-10				
CA: Nevada Co. (Western Part)	Nevada Co. (Western Part), CA	78	1	Subpart 1
8-Hr Ozone				
CA: Owens Valley	Owens Valley, CA	7	1	Serious
PM-10				
CA: Riverside Co, (Coachella Valley)	Riverside Co, (Coachella Valley), CA	325	1	Serious
8-Hr Ozone				
CA: Sacramento Metro	Sacramento Metro, CA	1,978	6	Serious
8-Hr Ozone	Sacramento Co, CA	1,223	1	Moderate
PM-10				
CA: San Diego	San Diego, CA	2,813	1	Subpart 1
8-Hr Ozone				
CA: San Francisco-Bay Area	San Francisco Bay Area, CA	6,542	9	Marginal
8-Hr Ozone				
CA: San Joaquin Valley	San Joaquin Valley, CA	3,191	8	Serious
8-Hr Ozone	San Joaquin Valley, CA	3,080	7	Serious
PM-10	San Joaquin Valley, CA	3,191	8	Nonattainment
PM-2.5				
CA: Searles Valley	Coso Junction, CA	7	1	Moderate
PM-10	Trona, CA	4	1	Moderate
PM-10				

8-Hr Ozone	Lansing-East Lansing, MI	448	3	Subpart 1
MI: Mason County				
8-Hr Ozone	Mason Co, MI	28	1	Subpart 1
MI: Muskegon				
8-Hr Ozone	Muskegon, MI	170	1	Marginal
MO-IL: St. Louis				
8-Hr Ozone	St Louis, MO-IL	2,505	9	Moderate
Lead	Jefferson County (part); Herculaneum, MO	2	1	
PM-2.5	St. Louis, MO-IL	2,487	9	Nonattainment
MT: Billings/Laurel				
SO2	Laurel Area (Yellowstone County), MT	6	1	Primary
MT: Butte				
PM-10	Butte, MT	35	1	Moderate
MT: Columbia Falls (Flathead County)				
PM-10	Columbia Falls, MT	4	1	Moderate
MT: East Helena				
Lead	East Helena Area (Lewis and Clark Co.), MT	2	1	
SO2	East Helena Area (Lewis and Clark Co.), MT	2	1	Primary, Second
MT: Kalispell (Flathead County)				
PM-10	Kalispell, MT	15	1	Moderate
MT: Lame Deer				
PM-10	Lame Deer, MT	1	1	Moderate
MT: Libby				
PM-10	Libby, MT	3	1	Moderate
PM-2.5	Libby, MT	3	1	Nonattainment
MT: Missoula				
Carbon Monoxide	Missoula, MT	52	1	Moderate <= 12.
PM-10	Missoula, MT	52	1	Moderate
MT: Polson (Lake County)				
PM-10	Polson, MT	4	1	Moderate
MT: Ronan (Lake County)				
PM-10	Ronan, MT	3	1	Moderate
MT: Thompson Falls				
PM-10	Sanders County (part);Thompson Falls and vicini	1	1	Moderate
MT: Whitefish (Flathead County)				
PM-10	Flathead County; Whitefish and vicinity, MT	5	1	Moderate
NC: Fayetteville				
8-Hr Ozone	Fayetteville, NC	303	1	Subpart 1 EAC
NC: Greensboro-Winston-Salem-High Point				
8-Hr Ozone	Greensboro-Winston Salem-High Point, NC	1,286	8	Marginal EAC
PM-2.5	Greensboro-Winston Salem-High Point, NC	568	2	Nonattainment
NC: Haywood and Swain Cos (Great Smoky Mtn NP)				
8-Hr Ozone	Haywood and Swain Cos (Great Smoky NP), NC	0	2	Subpart 1
NC: Hickory-Morganton-Lenoir				

8-Hr Ozone	Hickory-Morganton-Lenoir, NC	310	4	Subpart 1 EAC
PM-2.5	Hickory, NC	142	1	Nonattainment
NC: Raleigh-Durham-Chapel Hill				
8-Hr Ozone	Raleigh-Durham-Chapel Hill, NC	1,244	8	Subpart 1
NC: Rocky Mount				
8-Hr Ozone	Rocky Mount, NC	143	2	Subpart 1
NC-SC: Charlotte-Gastonia-Rock Hill				
8-Hr Ozone	Charlotte-Gastonia-Rock Hill, NC-SC	1,477	8	Moderate
NH: Boston-Manchester-Portsmouth (SE)				
8-Hr Ozone	Boston-Manchester-Portsmouth (SE), NH	697	4	Moderate
NM: Anthony				
PM-10	Anthony, NM	3	1	Moderate
NV: Las Vegas				
Carbon Monoxide	Las Vegas, NV	479	1	Serious
8-Hr Ozone	Las Vegas, NV	1,349	1	Subpart 1
PM-10	Clark Co, NV	1,376	1	Serious
NV: Reno				
Carbon Monoxide	Reno, NV	179	1	Moderate <= 12.
PM-10	Washoe Co, NV	339	1	Serious
NY: Albany-Schenectady-Troy				
8-Hr Ozone	Albany-Schenectady-Troy, NY	924	7	Subpart 1
NY: Buffalo-Niagara Falls				
8-Hr Ozone	Buffalo-Niagara Falls, NY	1,170	2	Subpart 1
NY: Essex County; Whiteface Mountain				
8-Hr Ozone	Essex Co (Whiteface Mtn), NY	1	1	Subpart 1
NY: Jamestown				
8-Hr Ozone	Jamestown, NY	140	1	Subpart 1
NY: Jefferson County				
8-Hr Ozone	Jefferson Co, NY	112	1	Moderate
NY: Poughkeepsie				
8-Hr Ozone	Poughkeepsie, NY	717	3	Moderate
NY: Rochester				
8-Hr Ozone	Rochester, NY	1,098	6	Subpart 1
NY-NJ-CT: New York-N. New Jersey-Long Island				
8-Hr Ozone	New York-N. New Jersey-Long Island, NY-NJ-CT	19,634	24	Moderate
PM-10	New York Co, NY	1,537	1	Moderate
PM-2.5	New York-N. New Jersey-Long Island, NY-NJ-CT	19,803	22	Nonattainment
OH: Canton-Massillon				
8-Hr Ozone	Canton-Massillon, OH	378	1	Subpart 1
PM-2.5	Canton-Massillon, OH	378	1	Nonattainment
OH: Cleveland-Akron-Lorain				
8-Hr Ozone	Cleveland-Akron-Lorain, OH	2,946	8	Moderate
PM-2.5	Cleveland-Akron-Lorain, OH	2,775	7	Nonattainment
OH: Columbus				

8-Hr Ozone PM-2.5	Columbus, OH Columbus, OH	1,542 1,449	6 5	Subpart 1 Nonattainment
OH: Dayton-Springfield				
8-Hr Ozone PM-2.5	Dayton-Springfield, OH Dayton-Springfield, OH	951 852	4 3	Subpart 1 Nonattainment
OH: Lima				
8-Hr Ozone	Lima, OH	108	1	Subpart 1
OH: Toledo				
8-Hr Ozone	Toledo, OH	576	2	Subpart 1
OH-KY-IN: Cincinnati-Hamilton				
8-Hr Ozone PM-2.5	Cincinnati-Hamilton, OH-KY-IN Cincinnati-Hamilton, OH-KY-IN	1,892 1,851	9 8	Subpart 1 Nonattainment
OH-PA: Youngstown-Warren-Sharon				
8-Hr Ozone	Youngstown-Warren-Sharon, OH-PA	715	4	Subpart 1
OH-WV: Steubenville-Weirton				
8-Hr Ozone PM-2.5	Steubenville-Weirton, OH-WV Steubenville-Weirton, OH-WV	132 132	3 3	Subpart 1 Nonattainment
OR: Eugene-Springfield				
PM-10	Eugene-Springfield, OR	179	1	Moderate
OR: LaGrande				
PM-10	LaGrande, OR	12	1	Moderate
OR: Lakeview				
PM-10	Lake Co, OR	3	1	Moderate
OR: Medford				
PM-10	Medford-Ashland, OR	78	1	Moderate
OR: Oakridge				
PM-10	Lane Co, OR	3	1	Moderate
OR: Salem				
Carbon Monoxide	Salem, OR	135	2	Not Classified
PA: Allentown-Bethlehem-Easton				
8-Hr Ozone SO2	Allentown-Bethlehem-Easton, PA Warren Co, NJ	638 102	3 1	Subpart 1 Primary, Second
PA: Altoona				
8-Hr Ozone	Altoona, PA	129	1	Subpart 1
PA: Clearfield and Indiana Cos				
8-Hr Ozone	Clearfield and Indiana Cos, PA	173	2	Subpart 1
PA: Erie				
8-Hr Ozone	Erie, PA	281	1	Subpart 1
PA: Franklin County				
8-Hr Ozone	Franklin Co, PA	129	1	Subpart 1
PA: Greene County				
8-Hr Ozone	Greene Co, PA	41	1	Subpart 1
PA: Harrisburg-Lebanon-Carlisle				
8-Hr Ozone	Harrisburg-Lebanon-Carlisle, PA	629	4	Subpart 1

PM-2.5	Harrisburg-Lebanon-Carlisle, PA	586	3	Nonattainment
PA: Johnstown				
8-Hr Ozone	Johnstown, PA	153	1	Subpart 1
PM-2.5	Johnstown, PA	164	2	Nonattainment
PA: Lancaster				
8-Hr Ozone	Lancaster, PA	471	1	Marginal
PM-2.5	Lancaster, PA	471	1	Nonattainment
PA: Pittsburgh-Beaver Valley				
8-Hr Ozone	Pittsburgh-Beaver Valley, PA	2,431	7	Subpart 1
PM-2.5	Liberty-Clairton, PA	22	1	Nonattainment
PM-2.5	Pittsburgh-Beaver Valley, PA	2,195	8	Nonattainment
SO2	Armstrong Co, PA	5	1	Primary
PA: Reading				
8-Hr Ozone	Reading, PA	374	1	Subpart 1
PM-2.5	Reading, PA	374	1	Nonattainment
PA: Scranton-Wilkes-Barre				
8-Hr Ozone	Scranton-Wilkes-Barre, PA	699	4	Subpart 1
PA: State College				
8-Hr Ozone	State College, PA	136	1	Subpart 1
PA: Tioga County				
8-Hr Ozone	Tioga Co, PA	41	1	Subpart 1
PA: York				
8-Hr Ozone	York, PA	473	2	Subpart 1
PM-2.5	York, PA	382	1	Nonattainment
PA-NJ-MD-DE: Philadelphia-Wilmin-Atlantic City				
8-Hr Ozone	Philadelphia-Wilmin-Atlantic Ci, PA-NJ-MD-DE	7,333	18	Moderate
PM-2.5	Philadelphia-Wilmington, PA-NJ-DE	5,537	9	Nonattainment
PR: Guaynabo County				
PM-10	Mun. of Guaynabo, PR	92	1	Moderate
RI: Providence (all of RI)				
8-Hr Ozone	Providence (All RI), RI	1,048	5	Moderate
SC: Columbia				
8-Hr Ozone	Columbia, SC	495	2	Subpart 1 EAC
SC: Greenville-Spartanburg-Anderson				
8-Hr Ozone	Greenville-Spartanburg-Anderson, SC	799	3	Subpart 1 EAC
TN: Johnson City-Kingsport-Bristol				
8-Hr Ozone	Johnson City-Kingsport-Bristol, TN	207	2	Subpart 1 EAC
TN: Knoxville				
8-Hr Ozone	Knoxville, TN	714	7	Subpart 1
PM-2.5	Knoxville, TN	599	5	Nonattainment
TN: Nashville				
8-Hr Ozone	Nashville, TN	1,098	5	Subpart 1 EAC
TN-AR: Memphis				
8-Hr Ozone	Memphis, TN-AR	948	2	Marginal

8-Hr Ozone	Berkeley and Jefferson Counties, WV	118	2	Subpart 1 EAC
WV: Charleston				
8-Hr Ozone	Charleston, WV	252	2	Subpart 1
PM-2.5	Charleston, WV	252	2	Nonattainment
WV: Weirton				
PM-10	Weirton, WV	15	2	Moderate
WV-KY: Huntington-Ashland				
8-Hr Ozone	Huntington-Ashland, WV-KY	189	3	Subpart 1
PM-2.5	Huntington-Ashland, WV-KY-OH	341	9	Nonattainment
SO2	Boyd County (part), KY	50	1	Primary
WV-OH: Parkersburg-Marietta				
8-Hr Ozone	Parkersburg-Marietta, WV-OH	151	2	Subpart 1
PM-2.5	Parkersburg-Marietta, WV-OH	153	3	Nonattainment
WV-OH: Wheeling				
8-Hr Ozone	Wheeling, WV-OH	153	3	Subpart 1
PM-2.5	Wheeling, WV-OH	153	3	Nonattainment
WY: Sheridan				
PM-10	Sheridan, WY	16	1	Moderate

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**ENVIRONMENTAL ASSESSMENT
CFR Part 58.36**

**General Ogden Site
1416 General Ogden Street et al
New Orleans, Louisiana**

ATTACHMENT 8

ENVIRONMENTAL JUSTICE

**UNITED STATES DEPARTMENT OF
HOUSING AND URBAN
DEVELOPMENT
NEW ORLEANS, LOUISIANA**

ENVIRONMENTAL JUSTICE STUDY

**1400-1440 GENERAL OGDEN HOUSING
DEVELOPMENT
NEW ORLEANS, LOUISIANA**

MARCH 2007

PREPARED BY:

**UNITED STATES RISK MANAGEMENT
365 CANAL STREET, SUITE 2760
NEW ORLEANS, LOUISIANA 70130
(504) 561-6563**

USRM PROJECT No. 15070017

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FIGURES

Figures

- 1 Site Location Map
- 2 Lead-Soil Classification Map

1.0 INTRODUCTION

The Housing Authority of New Orleans (HANO) intends to redevelop the housing units located at 1400-1440 General Ogden, which is referred to as the General Ogden Housing Development. HANO is proposing to redevelop this property due to roof damage sustained by Hurricane Katrina, the age and condition of the buildings and to provide a more sustainable mixed income environment to benefit the community overall. The redevelopment plans will ultimately provide residents with an improved quality of life by eliminating clear and present environmental hazards currently found in the development buildings and on the grounds as well as provide improved housing and a safer community environment.

Since the proposed redevelopment will affect low-income and minority populations which inhabited the General Ogden Housing Development prior to the hurricane, this document will investigate the Environmental Justice issues as required by Executive Order 12898 and covers the following topics:

- An overview of Executive Order 12898;
- Objectives and strategies and achieving Environmental Justice;
- A history of the General Odgen area and development;
- An overview of the plans for the housing development redevelopment and revitalization;
- Redevelopment and revitalization with lower densities;
- Demolition and Construction information for the development;
- Census information post Hurricane Katrina; and
- Displacement issues concerning tenants.

2.0 OVERVIEW OF EXECUTIVE ORDER 12898

The General Ogden Housing Development was vacant prior to Hurricane Katrina. Damage to the housing development as a result of Hurricane Katrina and in the natural aging process has made the development uninhabitable for residents, and residents have not been allowed to return to their apartment units. Engineering and environmental evaluations of the damages sustained to the housing complex following the hurricane indicate that the extensive nature of the damages do not support repair or renovations to the units. Rather, the damages, and associated costs support the recommendation for demolition and reconstruction of the housing complex. As a result, it is necessary to investigate Environmental Justice issues in order to determine whether or not the individuals that have been displaced from their housing units as a result of the hurricane have been discriminated against based on their race or level of income.

In 1994, President Clinton issued Executive Order 12898 entitled, "Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations." The United States Environmental Protection Agency (USEPA) implemented considerations of environmental justice considerations of environmental justice into the

NEPA process as a result of this Order. The USEPA has defined environmental justice as:

“The fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation and enforcement of environmental laws, regulations, and policies. Fair treatment means that no group of people, including racial, ethnic, or socioeconomic group should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local and tribal programs and policies.”

The goal of environmental justice is to identify and address potential disproportionately high and adverse human health and environmental effects on minority populations and low income populations, including interrelated social and economic effects, and identify alternatives that may mitigate the impacts. A screening for environmental justice involves a response to the following two questions:

- Does the potentially affected community include minority and/or low-income populations?
- Are the environmental impacts likely to fall disproportionately on minority and/or low-income members of the community and/or tribal resources?

3.0 POST-KATRINA CONDITIONS AT THE GENERAL OGDEN HOUSING DEVELOPMENT

3.1.1 Evaluation of the Site (Phase I Assessment)

A limited Phase I Environmental Site Assessment was performed on July 11, 2006 by PPM Consultants, Inc. (PPM) covering the entire proposed redevelopment site. The purpose of the Phase I assessment is to non-invasively document prevailing environmental conditions at a site. PPM concluded that the Phase I assessment revealed no evidence of recognized environmental conditions in connection with the property. However, the Phase I assessment does not investigate the presence of lead or asbestos hazards.

Evaluation of the surrounding properties did not identify historical uses of these adjoining properties that may adversely impact the subject property.

The Phase I Environmental Assessment for the entire project also noted damages related to Hurricane Katrina. All of the buildings appeared to be in poor condition with major roof damage. All of the buildings were unoccupied and generally boarded up. The entire subject area was fenced in and locked. Flooding was estimated to have been approximately 2.0 feet above land surface on a few of the buildings in the area. There was no apparent sign of flood sediments.

Reliable Disposal Company was listed as being located at 535 Iris Avenue in Jefferson, Louisiana and approximately 4,000 feet north-northwest of the project from the closest property boundary. The EDR database did not provide any details on this facility. The NPL/CERCLIS website also did not identify this facility on the website search. Based on distance, the facility does not appear to represent a recognized environmental condition.

A site location map is included as **Figure 1**.

3.1.2 Analysis of the Soil Post-Hurricane Katrina

The objective of the soil sampling investigations was to identify evidence of environmental impact to the HANO sites by assessing areas most likely to be impacted by sources of contamination. The primary focus of these studies was to assess potential environmental impacts from chemicals and pathogens that may have impacted the site as a result of floodwaters and flood-deposited sediments caused by Hurricane Katrina in August 2005. There was a concern that the sediments deposited within the city by the floodwaters may contain elevated levels of heavy metals, organic contaminants, and microbes.

A study to evaluate this potential concern has been conducted by the United States Environmental Protection Agency (USEPA) and the Louisiana Department of Environmental Quality (LDEQ). The EPA's primary sampling areas were in Downtown New Orleans and in the city of Chalmette located to the east of New Orleans. The report indicated heavy metal concentrations were generally higher in the New Orleans samples than in the Chalmette samples.

The USEPA and the LDEQ collected approximately 1,800 sediment samples in Jefferson, Orleans, Plaquemines and St. Bernard Parishes in four discrete phases since early September 2005 shortly after Hurricane Katrina. The results were compared to conservative health-based screening levels for residential exposure developed by the USEPA and the LDEQ. Summaries and general assessments of the data were developed with input from the Center of Disease Control (CDC), the Agency for Toxic Substances and Disease Registry (ATSDR), the Louisiana Department of Health and Hospitals (LDHH) and the Federal Emergency Management Association (FEMA). The sample results indicated that, in general, the sediments were not expected to cause adverse health impacts to individuals returning to New Orleans.

PPM Consultants, Inc prepared a Phase II Environmental Site Assessment (ESA) Soil Sampling Report for the United States Department of Housing and Urban Development (HUD) in their evaluation of the habitability of the General Ogden housing project. The PPM Phase II ESA Soil Sampling activities were performed between September 18 and 22, 2006. One (1) surface soil sample was collected and analyzed for Volatile Organic Compounds (VOC), Semi-volatile Organic Compounds (SVOC), the eight Resource Conservation Recovery Act (RCRA)

Metals, Organochloride Pesticides, Chlorinated Herbicides, Total Petroleum Hydrocarbons (TPH), PCB, Fecal Coliform and Escherichia coli. No sample result concentrations exceeded the RECAP standards.

3.1.3 Lead Hazard Issues

As part of PPM's Phase II Environmental Site Assessment (ESA) Soil Sampling Report, one (1) surface soil sample was collected and analyzed for lead. The sample result concentrations did not exceed the RECAP standards

Although the single sample collected by PPM indicated no significant lead contamination, numerous studies have been documented regarding elevated levels of lead in the soil. One of the studies that document the soils in the city of New Orleans is a study performed by Dr. Howard Mielke. In his report, "Lead in the Inner City", he details the following:

- Soil-lead concentrations in large cities are ten to 100 times greater than samples collected from smaller cities. Soil lead concentrations diminished the greater the distance from a city center (where traffic was lighter).
- Areas experiencing high traffic are shown to have elevated levels of lead in the soil closer to the street, due to the historical use of lead in automobiles.
- Lead dust is the most common source of exposure to lead and the soil is a giant reservoir of tiny particles of lead. The clays and organic matter in soil weakly bind to lead allowing it to remain in the soil in the inner cities for a long time.
- The association between soil lead and Pb-B was twelve orders of magnitude (10^{12}) stronger than the association between the age of housing and Pb-B levels.
- According to a map indicating the levels of lead in the inner city, it is documented that the soil in the vicinity of General Ogden indicated elevated levels of lead significantly above the standard for lead in soils. The levels of lead detected in the soil ranged from 500 ppm to 1,100 ppm. The standard for lead in soils is 400 ppm for high contact areas where children under the age of five are likely to play and come in contact with the soil.

All lead issues will be ameliorated during construction as part of handling potential adverse effects. A lead-soil classification map is included as **Figure 2**.

3.1.4 Asbestos Concerns

Due to the age of construction of the General Ogden housing development, exposure to asbestos containing materials (ACM) within the buildings and on the property grounds is an area of concern which must be mitigated. In December 2006, Citywide Testing, inc performed an asbestos inspection of the General Ogden properties. Samples were taken of the floor tile, tile mastic, roofing materials and piping insulation ACM located throughout the buildings in the General Ogden development includes the tile mastic in buildings 1415/1417 and 1433/1437.

Redevelopment and revitalization of the area will provide residents with significant environmental improvements by removing all structural and environmental hazards during demolition activities.

4.0 HISTORY OF THE GENERAL OGDEN HOUSING DEVELOPMENT

General Ogden is a scattered site public housing development located on the 1400-1440 blocks in the Cambronne/Carrollton area. The development was constructed in two phases, one in 1972 and the other in 1969 with a total of 28 units.

Today, the condition of the General Ogden Housing Development has diminished and like many housing developments in the country, it has been subject to crime and vandalism. Surrounding General Ogden is a mix of residential neighborhoods, unsubsidized privately owned rental property, commercial sites, single family homeownership units, vacant and deteriorating commercial buildings and vacant rental property. HANO's goal in redeveloping this area is to foster the neighborhood revitalization efforts, which include programs emphasizing economic growth and community pride.

5.0 OBJECTIVE AND STRATEGIES FOR ACHIEVING ENVIRONMENTAL JUSTICE – THE HOUSING AUTHORITY OF NEW ORLEANS

The United States Department of Housing and Urban Development Act of 1965 was created as a cabinet level agency. The HUD's mission is to provide a decent, safe, and sanitary home and sustainable living environment for every American by creating opportunities for ownership; providing assistance for low-income persons; working to create, rehabilitate, and maintain the nation's affordable housing; enforcing the nation's fair housing laws; helping the homeless; spurring economic growth in distressed neighborhoods; and helping local communities meet their development needs.

Ensuring environmental justice is a priority of HUD's mission. HUD promotes environmental quality in public housing, federally-assisted rental housing, and homeownership programs to ensure that low-income and minority families and individuals will have safe and healthy start in order to achieve greater self-sufficiency and independence. HUD strives to support sound environmental considerations in community development and housing policies that, at the same time, will preserve housing affordability and encourage rural and urban economic growth and private sector investment. However, there are statutory and regulatory requirements which require environmental analysis, NEPA, and Departmental regulations 24 CFR Parts 50, 51, 55, 58, as well as other related laws. HUD is committed to regenerating the nation's central cities as an integral part of a broad strategy for building strong and vital metropolitan communities.

While HUD's mission is on a national level, the Housing Authority of New Orleans (HANO) is the action entity for the local housing developments. HANO's mission is also ensuring that environmental justice is a priority and that the residents of the General

Ogden Housing Development have equal opportunities in finding affordable housing. The HANO has contracted with private developers whose role is to plan and redevelop the site and construction of affordable housing within the proposed three to five years.

In a meeting held by the National Environmental Justice Advisory Council on December 11-14, 2000, environmental justice strategies were presented that are based on three principals:

1. Housing policies that are environmentally sound, preserve affordability, and promote economic growth and investment;
2. The environmental quality of public housing and programs that offer low-income and minority populations a safe and healthy opportunity for self-sufficiency; and
3. A redesign of its programs and services, using an environmental justice framework to empower citizens to take action and improve their own lives.

HUD also provided General Environmental Justice Guidelines, which outlines the fundamental issues that need to be addressed:

- (a) Are some proposed project sites environmentally unsuitable? There are concerns of the presence of asbestos, lead, and soil contamination, which are detailed in Section 3.0.
- (b) Has an action been undertaken without considerable input by the surrounding low-income or minority community involvement in the planning and development process? HANO held a public meeting on December 20, 2006 and plans to schedule future public meetings to allow the community to have input into the planning and development process.
- (c) Is the proposed action likely to result in a disproportionate environmental or adverse environmental health impact on a protected population (low-income, minority, or low income minority population)? Redevelopment and revitalization of the area will provide residents with significant environmental improvements by removing all structural and environmental hazards during demolition activities.

In keeping in compliance with Executive Order 12898, the key questions that HUD needs to address with dealing with potential Environmental Justice issues are:

1. Is there an impact caused by the proposed action? The impact caused by the proposed action will benefit the site and the surrounding neighborhoods by removing the susceptibility of blight in the area and provides suitable living conditions for residents in need of housing.
2. Is the impact adverse? The impact is not adverse, but beneficial.
3. Is the impact disproportionate? The impact is not disproportionate.

4. Does the Finding and Analysis support the decision that was made? The Findings and Analysis support the decision that was made as there was no significant determination that would indicate that the proposed demolition and construction of the site would adversely impact the area.

At a minimum, the environmental justice review needs to adequately address the following environmental justice issues:

1. Determine the significance of the disparity
 - a) Calculate the demographic and census data
 - b) Consider community participation outreach efforts
2. Determine if the site or neighborhood suffers from disproportionate adverse environmental effects relative to the community at large, and if such impacts exist, they should be avoided or mitigated to the extent practicable
3. Identify and map the geographic area(s). Maps of the geographic area are attached in **Figures 1 and 2**.
4. Check statistics against reality
 - a) Were issues raised or facts presented at public hearings or community meetings that the environmental review process failed to capture? A public meeting was held on December 20, 2006 to discuss the redevelopment plans. HANO also plans to schedule public hearings or community meetings in the future to allow for public comment and communicate that the residents of the General Ogden Housing Development are not adversely impacted by the proposed demolition and construction activities.
 - b) Did a site investigation confirm the accuracy of the analysis and other findings? The site investigation confirms the accuracy of the analysis and other findings, which are detailed in Section 3.0.

The methodology used to determine whether there is a potential Environmental Justice Community of Concern involved an analysis of the affected area, including population characteristics of the vicinity of the General Ogden Housing Development, as well as the advantages and disadvantages of the redevelopment and the revitalization project. Information was obtained from the United States Census Bureau to evaluate specific geographic units that may be potentially affected by the development of new residences. Census data for the parish were obtained to determine if there were any potential areas of environmental justice concern within or adjacent to the General Ogden Housing Development area. The following information details the methodology and conclusions.

6.0 OVERVIEW OF PLANS FOR THE GENERAL OGDEN HOUSING DEVELOPMENT REDEVELOPMENT AND REVITALIZATION

The Housing Authority of New Orleans (HANO), along with a non-profit entity have formed an alliance to plan the redevelopment of the General Ogden Housing Development. Activities will include the demolition of seven (7) buildings at 1400, 1408, 1416, 1424, 1432, 1433 and 1440 General Ogden and the new construction of twenty-two (22) units, eighteen (18) of which will be public housing/tax credit units and four (4) will be tax credit/Section 8 Project based housing units. Redevelopment efforts will populate the development with two (2), three (3) and four (4) bedroom duplex units designed to be compatible with the neighborhood and is anticipated to be completed within one to two years.

The total cost for this project is \$6.5 million. The financing for the project includes approximately \$2.2 million in Section 14 Capital Fund Program and other Federal funds including \$47,000 in permanent loan.

The General Ogden Housing Development suffers from high density, overpopulated units, deteriorated buildings and infrastructure, obsolete building components, hazardous building materials, and building envelopes that are not energy efficient. Demolition and reconstruction of the Development will convert a conventional public housing development into a new, mixed-income community. The goal is to create a blueprint for a successful, stable, diverse, safe, attractive and sustainable mixed-income community.

The Master Planning process for the redevelopment and revitalization process for the General Ogden Housing Development began in the fall of 2006 after Hurricane Katrina. The redevelopment will occur in accordance with guidance located in the Louisiana Speaks Planning Initiative Book, an initiative of the Louisiana Recovery Authority. The Louisiana Vernacular, Victorian, and Classical styles will be featured in a combination of single, double and small apartment buildings.

On December 20, 2006, HANO held a public meeting to present the plans for the General Ogden Housing Development. Residents were informed and invited to the meeting by mail, newspaper ads and HANO's website. HANO also plans to have additional public meeting in the future as the process continues.

Redevelopment of the General Ogden Housing Development will result in the demolition of all the existing structures and removal of existing outdated infrastructure (i.e. water, gas and sewer lines). Further, because of the age of the General Ogden Housing Development, environmental improvements will also be made to the complexes by removing environmental hazards such as asbestos and contaminated soil. Construction of new multi-family units, and the addition of new utilities, drainage systems, and landscaping will foster a better community environment. Conversion of the conventional public housing development into a new, mixed-income community that will create a successful, stable, diverse, safe, attractive and sustainable mixed-income community. The current viewscape of the General Ogden Housing Development is incompatible and out of character with the nineteenth and twentieth century neighborhoods. Demolition of these structures would have a positive impact on the viewscape of the neighborhood characteristics.

7.0 CENSUS INFORMATION – POPULATIONS POST HURRICANE KATRINA

Information from new surveys conducted post-Hurricane Katrina was obtained from the United States Census Bureau in order to determine the percentage of minority and low-income populations in the project area.

In February 2006, the LDHH and the LRA requested assistance from the CDC and Prevention/ATSDR and the U.S. Census Bureau to:

- Estimate the population size and collect health and economic information in 18 hurricane-affected parishes;
- Compare survey-based population estimates with modeled estimates; and
- Develop a sustainable survey program to provide continuous population estimates as requested by federal, state and local authorities.

To fulfill these objectives, the 2006 Louisiana Health and Population Survey was conducted to provide state and local authorities with accurate demographic, health and economic information for public health, emergency preparedness and economic development planning. The Louisiana Public Health Institute was contracted to implement the process, oversee daily survey operations and deliver the data. The surveys for Orleans Parish were received between June and October 2006.

The 2006 Louisiana Health and Population Survey utilized a standard U.S. Census Bureau method to establish population size and demographics with modifications to account for the affects of the 2005 hurricane season. The greater New Orleans population was approximately 1.4 million people prior to Hurricane Katrina. According to the 2000 Census, the population was approximately 484, 674 people within the Orleans Parish city limits. Post Hurricane Katrina, the population is estimated between 187,525 and 287,000 people.

As of November 27, 2006, a study by the Louisiana Recovery Authority (LRA) puts the Orleans Parish population at 191,139 people. Data obtained from the 2006 survey indicated that the percent minorities located in the area since Hurricane Katrina is 47% (Table 1). Another November 2006 study by the Louisiana Public Health Institute, which was called the most extensive population study since Hurricane Katrina, found that the New Orleans minority population is still 41% of its previous size.

The LRA study also puts the percentage of households at or below the poverty level to be 11.3%, while 46.3% of the households were reported to be above the poverty level (Table 2).

The census information indicates that the majority of the area is of minority and low-income status. The redevelopment and revitalization of the General Ogden Housing

Development is intended to promote growth and a move toward self-sufficiency with the citizens of the community.

TABLE 1
Orleans Parish Population Estimates

	ESTIMATED POPULATION*	ESTIMATED %
Minority	89,835	47%
Non-Minority	101,304	53%
Total	191,139	100%

* New survey numbers obtained from the Louisiana Recovery Authority

TABLE 2
Orleans Parish Household Poverty Level Estimates

	ESTIMATED COUNT	ESTIMATED %
Not Indicated	32,361	42.4%
At or Below Poverty Level	8,598	11.3%
Above Poverty Level	35,392	46.3%
Total	76,351	100%

* New survey numbers obtained from the Louisiana Recovery Authority

8.0 DISPLACEMENT

HANO's Client Services staff continues to work with residents who have returned to New Orleans and those who are currently relocated in Atlanta, Baton Rouge, Dallas, Houston and other cities. Specifically, staff is working to provide to residents, authority-wide, the most pressing and prioritized need: comprehensive case management. Conducted by HANO staff, this service priority is drawn from data collected through surveys of HANO residents since the hurricane.

Based upon their self-described needs, HANO is working with service providers and community partners, both in New Orleans and other cities, to provide much needed assistance and services to HANO residents. The Agency has specifically worked with the United Methodist Committee on Relief (UMCOR), who has been charged by the federal government to administer over \$66 million in international donations made to Katrina survivors. HANO is currently working with UMCOR, the subgrantees, on the ground in the population centers with the greatest number of evacuees to provide various forms of assistance to our displaced residents, including assistance with accessing child care facilities, transportation, and schools. HANO has provided the residents with the opportunity to access their apartments and retrieve their belongings by scheduling an appointment with HANO's Management staff.

The short term plans for the displacement of residents involves providing all HUD assisted residents affected by Hurricane Katrina access to housing assistance through the

Disaster Voucher Program. This program is scheduled to end September 30, 2007. The long term plans for the displacement of resident begins October 1, 2007 for those HANO public housing residents who remain displaced because they cannot return to their properties. Those residents will be given a Tenant Protection Voucher (TPV), which functions in the same manner as a traditional Section 8 voucher.

HANO is also currently relocating residents to available scattered sites and to available units in the Iberville, B.W. Cooper, Guste High Rise and River Gardens Housing Developments. The order of preference for the relocation effort is as follows:

- Elderly residents age 62 and up;
- Elderly residents age 55 and up;
- All other residents via a waitlist and lottery process.

Upon completion of the newly constructed developments, HANO will handle the displaced resident relocation efforts by order of preference, which is as follows:

- Residents occupying the unit Pre-Katrina (in the case of unit rehabilitation)
- Residents occupying the site Pre-Katrina
- All other residents via a waitlist and lottery process.

HANO's Client Services Department is also available and working with residents to place them in work and job training opportunities provided by the community. Developers, contractors and professionals working on all HANO projects under contract of more than \$100,000 are required to recruit residents of affected sites for all available employment opportunities. Employment opportunities under Section 3 goals are as follows: recipients and covered contractors may demonstrate efforts to meet numerical goals "to the greatest extent feasible".

HANO has held public meetings on the demolition/disposition applications as well as on the Agency Plan which includes the plans for demolition and redevelopment. Residents were informed by mail and through newspaper ads and the HANO website of these meetings and were invited to attend. Residents did attend in large numbers. Copies of the agency plan were sent to Resident Council and Resident Management Co presidents in advance of the meetings. HANO has also discussed these plans at each board meeting. Monthly board meetings are announced through the newspapers and on the website and the presidents of the resident councils and resident management companies are provided the agendas and board materials in advance. It should be noted that the plans for demolition are currently considered to be in draft form pending comment and review. HANO will continue to communicate any changes to the demolition plans with the residents in the manner described above.

The redevelopment plans will ultimately provide residents with an improved quality of life by eliminating clear and present environmental hazards currently found in the buildings and on the grounds, as well as provide improved housing and a safer community environment.

Efforts described above indicate HANO's commitment to assist its displaced residents by working to alleviate issues they may face during their period of displacement and included residents' participation in the redevelopment planning process.

9.0 CONCLUSIONS

Though the majority of the General Ogden Housing Development residents are considered a minority, low-income population, the revitalization and redevelopment of the project area will have a net positive impact on the residents, as well as the surrounding community. While there are recognized temporary impacts such as displacement of residents and increased construction traffic, there are clear, defined positive environmental impacts to the project area. The redevelopment plans will ultimately provide residents with an improved quality of life by eliminating clear and present environmental hazards currently found in the buildings and on the grounds, as well as provide improved housing and a safer community environment.

In addition, due to the project development, there will be enormous community involvement in the project. Public meetings have been held regarding the proposed revitalization and redevelopment project. Public participation, and community involvement and interactions have been encouraged. Information regarding all aspects of the upcoming project will be forthcoming and readily available to members of the community. HANO maintains its commitment to its displaced residents by working to alleviate issues they may face during their period of displacement and included residents' participation in the redevelopment planning process.

The new buildings that will be constructed will provide a mixed-use community consisting of public housing eligible rental units and market rate rental units. All lead and asbestos contamination will be removed in accordance with the applicable state and federal regulations. Drug paraphernalia that once littered the grounds of the General Ogden Housing Development will be removed. If soil contamination is present, then the soil will be removed and disposed of at an off-site permitted landfill. All areas of contamination will receive letters of No Further Remedial Action from the Department of Environmental Quality, following completion of all remedial activities.

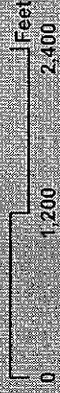
The new developments are intended to provide the community with safe and clean housing. These changes are intended to promote positive growth and change, as well as provide increased opportunities for those individuals living in and around the project area. Any adverse impacts will be temporary, and the resulting outcome of the project will provide permanent benefits to the community at large.

FIGURE 1

SITE LOCATION MAP

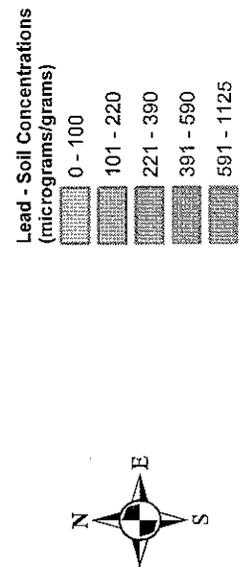
FIGURE 2

LEAD-SOIL CLASSIFICATION MAP

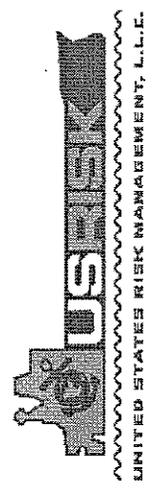


Lead - Soil Classification Map
DRAFT
 Housing Authority of New Orleans
 General Ogden Urban Development
 Orleans Parish, Louisiana

Legend



project no	15-060165
designed	j chimento
reviewed	t dodd
date	03.09.07



**NOTICE OF FINDING OF NO SIGNIFICANT IMPACT AND
NOTICE OF INTENT TO REQUEST RELEASE OF FUNDS**

Date of Notice: May 29, 2007
Responsible Entity: Anthony Faciane, City of New Orleans
Address: 1340 Poydras St. Suite 1000
City, State, Zip Code: New Orleans, LA 70112
Telephone Number of RE: 504-658-4217

These notices shall satisfy two separate but related procedural requirements for activities to be undertaken by the City of New Orleans .

REQUEST FOR RELEASE OF FUNDS

On or about June 15, 2007, the City of New Orleans will authorize the Housing Authority of New Orleans to submit requests to HUD for the release of funds for the following undertaking:

approximately \$2,700,000 in Capital Grant Funds in accordance with Section 14 of the U.S. Housing Act of 1937, or other HANO Funds, to undertake a project known as the Redevelopment of the General Ogden site (at 1416 General Ogden Street) for the purpose of demolishing eight buildings and constructing 22 new housing units at the HANO scattered site known as General Ogden. This project includes approximately \$3,800,000 in Low Income Housing Tax Credit Equity.

FINDING OF NO SIGNIFICANT IMPACT

The City of New Orleans has determined that the project will have no significant impact on the human environment. Therefore, an Environmental Impact Statement under the National Environmental Policy Act of 1969 (NEPA) is not required. Additional project information is contained in the Environmental Review Record (ERR) on file with:

**Anthony Faciane
Environmental Certifying Officer
Deputy Chief for Development
City of New Orleans
1340 Poydras Street, Suite 1000
New Orleans, LA 70122
Telephone: (504) 658-4217**

It may be examined or copied weekdays 9A.M to 4:00P.M.

PUBLIC COMMENTS

Any individual, group, or agency may submit written comments on the ERR to the Certifying Officer designated above. All comments received by June 14, 2007 will be considered by Anthony Faciane prior to authorizing submission of a request for release of funds. Comments should specify which Notice they are addressing.

RELEASE OF FUNDS

The City of New Orleans certifies to HUD that Anthony Faciane, in his capacity as Executive Assistant to the Mayor and Environmental Certifying Officer, consents to accept the jurisdiction of the Federal Courts if an action is brought to enforce responsibilities in relation to the environmental review process and that these responsibilities have been satisfied. HUD's approval of the certification satisfies its responsibilities under NEPA and related laws and authorities and allows the Housing Authority of New Orleans to use Program funds.

OBJECTIONS TO RELEASE OF FUNDS

HUD will accept objections to its release of funds and the City of New Orleans certification for a period of fifteen days following the anticipated submission date or its actual receipt of the request (whichever is later) only if they are on one of the following bases:

- (a) the certification was not executed by the Certifying Officer of the City of New Orleans**
- (b) the RE has omitted a step or failed to make a decision or finding required by HUD regulations at 24 CFR part 58;**
- (c) the grant recipient has committed funds or incurred costs not authorized by 24 CFR Part 58 before approval of a release of funds by HUD; or**
- (d) another Federal agency acting pursuant to 40 CFR Part 1504 has submitted a written finding that the project is unsatisfactory from the standpoint of environmental quality. Objections must be prepared and submitted in accordance with the required procedures (24 CFR Part 58, Sec. 58.76) and shall be addressed to HUD administration office at address of that office at:**

**United States Department of
Housing and Urban Development
Division of Public and Indian Housing
Hale Boggs Federal Building
500 Poydras Street 9th Floor
New Orleans, LA 70130
Telephone: (504) 589-7251**

Potential objectors should contact HUD to verify the actual last day of the objection period.

Anthony Faciane, Executive Assistant to the Mayor & Certifying Officer

C. Ray Nagin, Mayor

DRAFT

Appendix B
Public Notice

FEMA PUBLIC NOTICE OF AVAILABILITY

Draft Supplemental Environmental Assessment for General Ogden Housing Development Orleans Parish, Louisiana

Interested parties are hereby notified that the Federal Emergency Management Agency (FEMA) has prepared a Draft Supplemental Environmental Assessment (EA) and Draft Finding of No Significant Impact (FONSI) for the proposed construction of additional public housing at the Housing Authority of New Orleans' (HANO) General Ogden site. The U.S. Department of Housing and Urban Development (HUD) prepared an EA and issued their FONSI for the proposed action in May 2007. Any federal agency may adopt another federal or state agency's EA, and is encouraged to do so when such adoption would save time and money (40 CFR §1500.4(n), §1500.5(h), and §1506.3), providing the original document satisfies the agency's National Environmental Policy Act (NEPA) requirements. FEMA has adopted HUD's EA and has also provided supplemental information relative to some of the resource categories.

HANO has submitted an application for FEMA Public Assistance funding being administered in response to FEMA-1603-DR-LA, Hurricane Katrina, which was signed as a Presidential Disaster Declaration on August 29, 2005. HANO proposes to construct 22 units on the General Ogden site. This site is located in New Orleans' Hollygrove neighborhood. The proposed project would provide 18 public housing/tax credit units and four tax credit/Section 8 Project Based units. It involves construction on both sides of General Ogden Street. The even numbered side of the street is bounded by General Ogden, Monticello, Willow, and Jeanette Streets; the odd numbered side of the street is bounded by General Ogden, Willow, Eagle, and Jeanette Streets.

In accordance with NEPA (42 U.S.C. 4371 *et seq.*), and associated environmental statutes, a Draft Supplemental EA was prepared to evaluate the proposed action's potential impacts on the human and natural environment. The Draft Supplemental EA summarizes the purpose and need for the proposed action, the site selection process, the affected environment, and the potential environmental consequences associated with the proposed action. The Draft FONSI is FEMA's finding that the proposed action will not have a significant effect on the human and natural environment.

The public comment period will be for 15 days, from Friday, May 21, 2010 to Friday, June 4, 2010. Written comments on the proposal may be mailed to:

DEPARTMENT OF HOMELAND SECURITY
Federal Emergency Management Agency
Environmental/Historic Preservation
General Ogden Project
1 Seine Ct.
New Orleans, LA 70114

Or emailed to: FEMA-NOMA@dhs.gov or faxed to FEMA's Transitional Recovery Office in New Orleans at 504-762-2323; and verbal comments will be accepted at 504-762-2361 between the hours of 7:30 a.m. and 4:00 p.m. The Draft EA can be viewed and downloaded from FEMA's website at www.fema.gov/plan/ehp/envdocuments/ea-region6.shtm and is also available for public review at the New Orleans Main Public Library, 219 Loyola Ave., New Orleans, LA 70112 and at the Nix Library, 1401 S. Carrollton Ave., New Orleans, LA 70118. If no substantive comments are received, the Draft EA and associated FONSI will become final and this initial Public Notice will also serve as the final Public Notice.