

**Environmental Assessment
and Compliance Findings
for the Related Laws**

RMS: HI-00487R

**U.S. Department of Housing
and Urban Development**

1. Project Number:
 HUD Program:
 2. Date Received:

Findings and Recommendations are to be prepared **after** the environmental analysis is completed. Complete Items 1 through 15 as appropriate for all projects. For projects requiring an environmental assessment, also complete Parts A and B. For projects categorically excluded under 24 CFR 50.20, complete Part A. Attach notes and source documentation that support the findings.

3. Project Name and Location: (Street, City, County, State) Lafitte Housing Development Bounded by Orleans Ave, North Claiborne Ave, North Rochblave St, and Lafitte Ave New Orleans, LA Orleans Parish	4. Applicant Name and Address (Street, City, State, Zip Code), and Phone Housing Authority of New Orleans 4100 Touro Street New Orleans, LA 70122 504-670-3426
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5. <input checked="" type="checkbox"/> Multifamily <input type="checkbox"/> Elderly <input type="checkbox"/> Other Explain Other	6. Number of: 812 Dwelling Units Stories	Buildings Acres	7. Displacement: <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes See Introduction
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8. <input checked="" type="checkbox"/> New Construction <input type="checkbox"/> Rehabilitation <input type="checkbox"/> Other See Introduction	10. Planning Findings: Is the project in compliance or conformance with the following plans?
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9. Has an environmental report (Federal, State, or local) been used in completing this form? Yes No
See Appendices for Reports

Local Zoning:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Applicable
Coastal Zone:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Applicable
Air Quality (SIP):	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Applicable

See Introduction

Are there any unresolved conflicts concerning the use of the site? Yes No
Explain "Yes"

11. Environmental Finding: (check one)

Categorical exclusion is made in accordance with § 50.20 or

Environmental Assessment and a **Finding of No Significant Impact (FONSI)** is made in accordance with § 50.33 or

Environmental Assessment and a **Finding of Significant Impact** is made, and an Environmental Impact Statement is required in accordance with §§ 50.33(d) and 50.41.

Project is recommended for approval (List any conditions and requirements):

Project is recommended for rejection (State reasons):

12. Preparer: (signature) <i>Raguel & Murphy</i>	Date: 8/16/07	13. Supervisor: (signature) <i>[Signature]</i>	Date: 8/16/07
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14. Comments by Environmental Clearance Officer (ECO): (required for projects over 200 lots/units)
 Follow the floodproofing measurements identified in the FloodPlain Analysis. Implement the requirements set forth in the Section 106 Memorandum of Agreement that addresses historic preservation issues.

ECO: (signature) <i>Daniel R. O'Conner</i>	Date: 9-14-07
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15. Comments (if any) by HUD Approving Official:

HUD Approving Official: (signature) <i>Kathie O. Clark</i>	Date: 9/17/07
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Part A. Compliance Findings for §50.4 Related Laws and Authorities

§50.4 Laws and Authorities	Project Is In Compliance		Source Documentation and Requirements for Approval
	Yes	No	
16. Coastal Barrier Resources	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The site is not located in a Coastal Barrier Resource System. (Source: FEMA's Flood Insurance Rate Map (FIRM) Community Panel Number 225 203-0160 E dated 1984, and the 8 Step Floodplain Analysis. See Appendix D.)
17. Floodplain Management (24 CFR Part 55)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The Target Area is located in a Zone A3 100 year floodplain identified as a ponding area. The 8-Step Floodplain Management review required by E.O. 11988 and found in 24 CFR 55.20 concluded that there was no practical alternative to the project as proposed. All newly constructed buildings must be built at an elevation three feet higher than its present elevation according to the April 2006 FEMA Flood Recovery Guidance publication. The project owner(s) must also obtain flood insurance for the life of the mortgage or the life of the improvement. (Source: FEMA's Flood Insurance Rate Map (FIRM) Community Panel Number 225 203-0160 E dated 1984, and the 8 Step Floodplain Analysis. See Appendix E.)
18. Historic Preservation (36 CFR Part 800)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	HUD, the State Historic Preservation Officer (SHPO) and the Advisory Council on Historic Preservation (ACHP) agree that the demolition of the Lafitte Housing Development would constitute an adverse effect on an historic property per 36 CFR 800.4 and 800.5(b). Furthermore, the SHPO stated that there is a potential for intact archaeological deposits to be encountered during redevelopment. The Section 106 Consultation Process was completed and a Memorandum of Agreement as described in 36 CFR Part 800 was signed by all parties. The MOA identifies measures required of HANO to protect historic preservation interests within the site. (See Appendix F for a copy of the MOA.)
19. Noise Abatement (24 CFR Part 51 Subpart B)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The noise analysis indicates that the noise levels created by the streets that border the site are less than 65 DNL (Acceptable). Noise levels will not increase due to traffic generated within the project site. Demolition and construction noise will temporarily increase ambient noise levels for a brief period of time. This increase in noise levels will be restricted to the daytime hours. Construction traffic will be routed to the site using major arteries, specifically Claiborne Avenue and Interstate 10. Noise levels from roads, railroads and aircraft do not exceed the 65 DNL limit. (Source: Noise Analysis (See Appendix G)).
20. Hazardous Operations (24 CFR Part 51 Subpart C)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	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." Source: Existing land use map. (See Appendix H)
21. Airport Hazards (24 CFR Part 51 Subpart D)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	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. (Source: Glen Whittaker, Operations Supervisor, Louis Armstrong International Airport; Joel Jenkinson, Airport Operations Mgr, Lakefront Airport; Thomas Garntham, Architect Planner, Naval Air Station. See also Runway Clear Zone Maps in Appendix I).
22. Protection of Wetlands (E. O. 11990)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The project is/was previously developed. No wetlands, marshes, wet meadows, mud flats or natural ponds located on site as per field observation and maps issued by the U.S. Fish & Wildlife Service (USFWS). Source: National Wetlands Inventory (NWI) map (ecos.fws.gov). (See Appendix J).
23. Toxic Chemicals & Radioactive Materials (§ 50.3(l))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	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. After Hurricane Katrina, the NRDC and the USEPA collected sediment samples from the Lafitte and Tremé area and detected elevated levels of lead in the soil. Source: Phase I Environmental Site Assessment prepared by PPM Consultants in June 2006 and CERCLIS List. (See Appendix K)
24. Other § 50.4 authorities (e.g., endangered species, sole source aquifers, farmlands protection, flood insurance, environmental justice)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Endangered Species: The proposed project is located in a densely developed urban setting. The Louisiana Department of Wildlife and Fisheries (LDWF) determined that the proposal will not threaten any Federally or state approved (listed or proposed) species. Source: Finding by LDWF (See Appendix L). Sole Source Aquifers: The project is not located within a U.S. Environmental Protection (EPA) designated sole source aquifer watershed area. Source: Region 6 Ground Water Office, Sole Source Aquifer Map and

www.epa.gov/arkansas/6wq/swp/ssa/ssa.htm (See Appendix M).

Farmlands Protection: According to the US Department of Agriculture, Natural Resources Conservation Service web soil survey (websolldsurvey.nrcs.usda.gov), the soil mapped is Schreiver clay (formerly Sharkey clay), which is classified as prime farmland. The project site has been commercially or residentially developed for over 100 years and committed to urban use, therefore this project does not involve the conversion of prime or unique farmland.

Source: websolldsurvey.nrcs.usda.gov

Flood Insurance - The site is located in a Special Flood Hazard Area, therefore, Flood Insurance must be taken in all properties.

Source: FEMA's Flood Insurance Rate Map (FIRM) Community Panel Number 225 203-0160 E dated 1984. (See Appendix E).

Environmental Justice - The proposed project will not adversely impact environmental conditions affecting low income or minority populations residing in the Target Area.

Source: The Environmental Justice Study prepared by USRM. (See Appendix N).

Part B. Environmental/Program Factors

Factors	Anticipated Impact/Deficiencies			Source Documentation and Requirements for Approval
	None	Minor	Major	
25. Unique Natural Features and Areas	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Unique Natural Features - No unique natural features such as cliffs or bluffs are in the vicinity of the subject property. Further, there is no resource extraction activity in the affected area.
26. Site Suitability, Access, and Compatibility with Surrounding Development	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The site will retain its original residential land use which is compatible with the land use of the surrounding development. Source: PPM Phase I Environmental Site Assessment (See Appendix K)
27. Soil Stability, Erosion, and Drainage	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No slope was identified on the subject property during site reconnaissance. According to the US Geological Survey (USGS) 1998 topographic map titled "New Orleans East, LA", the property is relatively flat and at or just below sea level. No evidence of soil erosion was observed in the subject area. The Target Area is fully developed. During redevelopment, Best Management Practices will be utilized to minimize or eliminate any erosion during ground work. Soils within the Target Area are suitable for residential development. The Target Area has been developed with residential properties since prior to the 1940s.
28. Nuisances and Hazards (natural and built)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The project site currently contains vandalized and hurricane damaged boarded up structures that present a safety hazard to the immediate site and neighborhood. The buildings contain asbestos and lead-based paint. The proposed redevelopment will remove all blighted buildings. During demolition and reconstruction, the project will be fenced to restrict access to the local population.
29. Water Supply/ Sanitary Sewers	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Waste Water - Existing municipal sewage systems will be able to adequately service the proposed development. Construction run off will be controlled by BMPs. (Source: Bryan Jones, New Orleans Sewerage and Water Board.) Storm Water - Existing municipal stormwater disposal systems will be able to adequately service the proposed development. Construction run off will be controlled by BMPs. (Source: Bryan Jones, New Orleans Sewerage and Water Board.) Water Supply - 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.
30. Solid Waste Disposal	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The existing municipal solid waste disposal system will adequately service the proposed development. The contractor will manage the removal of construction debris. The site is in the current garbage collection route according to the City of New Orleans website, www.cityofno.com .

31. Schools, Parks, Recreation, and Social Services	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Open Space - Open space in the densely developed neighborhoods surrounding the property consists mostly of lawns. Adequate open common space is planned in the proposed redevelopment.</p> <p>Recreation - Armstrong Park, Hunter's Field Park and Warren Easton Park are located less than 1 mile southeast of the subject property.</p> <p>Cultural Facilities - The Carrolton Community Home, Gert Town Community Center and YMCA are a few of the community facilities located within two miles of the subject property. Cultural facilities exist in surrounding areas. Several churches are in the vicinity, as well as Xavier University, are nearby.</p> <p>Education Facilities - Sufficient primary, secondary and higher educational facilities exist in the Target Area surrounding the subject property. The number of school aged students returning to the Target Area will not exceed the capacity of the existing schools. The immediate area contains the James Johnson Elementary, located 4 blocks from the site, which offers k-8 instruction as of 8/2006. McMain High School is the closest High School, and is open as of 8/2006. Source: www.nolapublicschools.net.</p> <p>Social Services - Numerous social services, including Volunteers of America, Daughters of Charity Services, and Gert Town Community Center are located within two miles of the subject property. City of New Orleans social services are readily available throughout the city. 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.</p>
32. Emergency Health Care, Fire and Police Services	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Public Safety, Police - New Orleans Police Department facilities are located less than one mile south of the subject property. Response time is within five minutes. (Source: the City of New Orleans website)</p> <p>Public Safety, Fire - New Orleans Fire Department facilities are located less than one mile south of the subject property. Response time is within five minutes. (Source: Interview with Officer on duty at Police Station and City of New Orleans website.)</p> <p>Emergency Health Care - Ochsner Hospital is located approximately four miles west of the subject property. Touro Hospital is located approximately three miles south of the subject property. Children's Hospital is located approximately four miles south of the subject property. Memorial Medical Center, which is partially open since Hurricane Katrina, is located two miles south of the subject property. Katrina related events have reduced the city capacity for medical care, but as the population returns, services return. Ochsner Foundation Hospital is four (4) miles west from the site. Emergency health care will be readily available at the completion of the project. Response time within five minutes.</p> <p>Source: Interview with Medical Center of New Orleans officials. September 11, 2006.</p>
33. Commercial/ Retail and Transportation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Commercial Facilities - Orleans Avenue is a heavily commercially-developed roadway, and is located 0.2 mile north of the subject property. The proposed project will have no negative impact on commercial facilities.</p> <p>Transportation - The New Orleans Regional Transit Authority (RTA) has numerous bus lines that run along Orleans Avenue and North Claiborne Avenue. Customer demand diminished following Hurricane Katrina with the loss of population in the City. Bus service will increase as people return to the neighborhood. Construction traffic will be restricted to the major roadways.</p> <p>Source: the Regional Transit Authority's website, www.norta.com/routes.php</p>
34. Other	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Energy Consumption - The 77 structures slated for demolition were built in the 1940s and 1950s. The structures will be replaced with energy-efficient units designed to the current building codes. Additionally, fewer units will be built thereby reducing the demand for energy.</p>

September 13, 2007

MEMORANDUM FOR: Dominique Blom, Deputy Assistant Secretary for Public
Housing Investments, PI

FROM: Robert Goulka, Disaster Recovery Coordinator, 5AD

SUBJECT: Environmental Assessment
Lafitte Housing Development
Project Number: LA-00-1005



An environmental assessment, using HUD form 4128 and associated appendices was written by U.S. Risk management for the Housing Authority of New Orleans (HANO) and the U.S. Department of Housing and Urban Development (HUD) to satisfy the environmental review requirements of 24 CFR Part 50. I have personally seen the project site and reviewed the documents for sufficiency and adequacy. Based on my oversight review, I have concluded that the documents satisfy the requirements of the National Environmental Policy Act and justify a conclusion that the proposed project will have "No Significant Impact" on the environment. I recommend that a program official approve the environmental assessment by signing block # 15 of HUD form-4128.

The environmental assessment identified the following two conditions:

1. That all newly constructed buildings must be built at an elevation three feet higher than its present elevation according to the April 2006 FEMA Recovery Guidance publication to remove the structures from future flooding.
2. That HUD and HANO comply with the stipulations listed in the Section 106 Historic Preservation Memorandum of Agreement.



**U.S. Department of Housing
and Urban Development**

**Environmental Assessment
and Compliance Findings
for the Related Laws**
[24CFR Part 50]

Project Name: Lafitte Housing Development
Project Number: LA-001005

Applicant Name: Housing Authority of New Orleans [HANO]
4100 Touro Street
New Orleans, LA 70122

Project Representative: Judith Jones Moran
(504) 670-3426

Preparer: United States Risk Management, L.L.C.
Tracey D. Dodd, Principal
365 Canal Street, Suite 2760
New Orleans, LA 70130
(504) 561-6563

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Project Summary

Environmental Assessment (form HUD-4128)

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Appendix E: Section 106 Historic Preservation Review

Appendix F: Noise Analysis

Appendix G: Existing Land Use Map

Appendix H: Runway Clear Zone Map

Appendix I: Wetlands Map

Appendix J: Phase I Environmental Site Assessment

Appendix K: Endangered Species Letter

Appendix L: Sole Source Aquifer Map

Appendix M: Environmental Justice Study

Appendix N: Other Reports

Appendix O: 30 Day FONSI Notice

Project Summary

Project Description:

The U.S. Department of Housing and Urban Development (HUD) proposes to fund the Housing Authority of New Orleans (HANO) using Section 14 Capital Fund Program, Replacement Housing Factor Funds and Section 901 funds to redevelop the Lafitte Housing Development.

The State of Louisiana, Office of Community Development will use Community Development Block Grant funds to fund infrastructure improvements for the proposed project.

The redevelopment will consist of the demolition of 77 vacant existing buildings (896 units) on project site, to be replaced by the construction of 556 units on the Lafitte site, and 256 additional units on the surrounding target neighborhood, for a total of 812 new units.

The project has two components: the existing Lafitte Housing Development site and the target neighborhood surrounding the Lafitte Housing Development site.

The following activities will be undertaken at the Lafitte Housing Development:

- Demolish 896 public housing units;
- Construct 100 public housing units designated for seniors;;
- Construct 176 public housing units for families;
- Construct 100 Low Income Housing Tax Credit only units;
- Construct 40 homeownership units on-site for low-income families;
- Construct 140 homeownership units on-site for moderate income families.

The following activities will be undertaken in the target area surrounding the Lafitte site:

- Acquire and construct 192 Section 8 assisted units;
- Acquire and construct 64 homeownership units for moderate income families

HANO will hire a private developer to plan and redevelop the site. Completion of all facets of the undertaking will occur within three to five years.

Site Boundaries:

The Lafitte Housing Development site is located near the New Orleans central business district in an area generally bounded by Lafitte Street, Orleans Avenue, North Claiborne Avenue, and North Rocheblave Street.

Target Neighborhood Boundaries:

The target neighborhood extends 1.5 miles outside of the Lafitte Housing Development site. The area is bounded by Interstate 610, Franklin Avenue, Decatur Street, Earhart Boulevard, Washington Avenue and Carrollton Avenue.

A map of the area is included in Figure 1.

Project Background:

Lafitte is a conventional site public housing development owned by the Housing Authority of New Orleans (HANO). It was constructed in 1941 with 896 units. All units remain on the 27.2 acre site and have been vacant since Hurricane Katrina.

The redevelopment plan is comprised of two phases. Phase One (Lafitte) proposes to construct 556 housing units on the Lafitte housing site and 256 housing units in the target area. Phase Two (Lafitte II) proposes to construct 688 off-site housing units.

Existing Conditions and Trends:

The property is currently developed with abandoned and hurricane-damaged structures. The neighborhood of the subject property was impacted by three to five feet of floodwaters from Hurricane Katrina which caused flooding of the first floor units by approximately six inches to twelve (12) inches. It also flooded the crawl spaces, causing damage to plumbing and piping due to possible salt water intrusion, leading to corrosion and ultimately damage the piping. Hurricane force winds and vandalism also caused damage to the building's exteriors. A number of windows were broken, and need to be replaced. The exterior and unit entry doors were damaged throughout the site. The primary area of wind damage was the roof of each building. A 2006 inspection from a qualified roofing contractor found significant damage due to tile being uplifted, causing nails and substrate to be damaged. It was observed that a number of locations had extensive water damage to the plaster ceilings at the third floor attic locations. This condition is prevalent throughout the site and would indicate there is possible damage to the substrate and trusses supporting the roof. The copper roof flashing at walls and chimneys were, in most instances, found to be damaged or missing due to theft.

An area of concern regarding damage is the moisture barrier, which is an important part of the wall system of the exterior wall construction. Flooding on the first floor and extensive water intrusion through the roof and broken windows has partly caused moderate to extensive mold growth in most of the walls and ceilings. There is no central air conditioning system in the buildings and this has contributed to mold growth in these apartments. It appears that some tenants have incorporated "window-type" air conditioners in a number of the units. However, these window units violate the egress code that requires a means of escape from each of these spaces. This also does not pass HUD's UPCS for inspection. The kitchen appliances have been damaged due to flooding and the year-plus of inoperability and being open to the environmental conditions.

The property is also historically known to contain lead based paint and asbestos containing material. Abatement had been performed on some building components, but the hazards still exists in numerous areas.

The surrounding area 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. The site and surrounding area were inundated with floodwaters related to Hurricane Katrina.

Displacement:

The development structures were damaged due to Hurricane Katrina and residents were displaced. Although the redevelopment and rehabilitation plans will temporarily prolong the displacement of the development residents, the 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. HANO is also currently working with the displaced residents to alleviate any issues they may face during their period of displacement and has included residents' participation in the redevelopment planning process. HANO estimates that units will be developed and/or rehabilitated at Lafitte and other sites in sufficient quantity to be compatible with the number of former of residents returning to the City.

Air Quality

The proposed project will not have an adverse effect on the ambient air quality.

Asbestos abatement will occur in accordance with all Louisiana Department of Environmental Quality (LDEQ) regulations. Air sampling will be conducted during asbestos abatement to ensure the safety of the surrounding area. Demolition and construction dusts impact on air quality will be eliminated or minimized using Best Management Practices (BMPs).

The project site is located within an attainment area, according to the US EPA and the Louisiana Department of Environmental Quality. The project requires no individual NESHAP permit or notification.

Estimated total project cost

The total project is estimated at \$100 million. Approximately \$45 million in federal funds will be contributed to the redevelopment of Lafitte through Capital Funds, Replacement Housing Factor and Section 901 housing funds for demolition, rehabilitation and construction. In addition \$27 Million will be allocated from Community Development Block Grants (CDBG) funds for infrastructure and a community center. It is projected that these funds will be leveraged with tax credit funding and conventional financing to complete the project budget.

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22. Protection of Wetlands (E. O. 11990)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The project is/was previously developed. No wetlands, marshes, wet meadows, mud flats or natural ponds located on site as per field observation and maps issued by the U.S. Fish & Wildlife Service (USFWS). Source: National Wetlands Inventory (NWI) map (ecos.fws.gov). (See Appendix I).
23. Toxic Chemicals & Radioactive Materials (§ 50.3(i))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	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. After Hurricane Katrina, the NRDC and the USEPA collected sediment samples from the Lafitte and Tremé area and detected elevated levels of lead in the soil. Source: Phase I Environmental Site Assessment prepared by PPM Consultants in June 2006 and CERCLIS List. (See Appendix J)
24. Other § 50.4 authorities (e.g., endangered species, sole source aquifers, farmlands protection, flood, insurance, environmental justice)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Endangered Species: The proposed project is located in a densely developed urban setting. The Louisiana Department of Wildlife and Fisheries (LDWF) determined that the proposal will not threaten any Federally or state approved (listed or proposed) species. Source: Finding by LDWF (See Appendix K). Sole Source Aquifers: The project is not located within a U.S. Environmental Protection (EPA) designated sole source aquifer watershed area. Source: Region 6 Ground Water Office, Sole Source Aquifer Map and

www.epa.gov/arkansas/6wq/swp/ssa/ssa.htm (See Appendix L).

Farmlands Protection: According to the US Department of Agriculture, Natural Resources Conservation Service web soil survey (websoilsurvey.nrcs.usda.gov), the soil mapped is Schreiver clay (formerly Sharkey clay), which is classified as prime farmland. The project has been commercially or residentially developed for over 100 years and committed to urban use, therefore this project does not involve the conversion of prime or unique farmland.

Source: websoilsurvey.nrcs.usda.gov

Flood Insurance - The site is located in a Special Flood Hazard Area, therefore, Flood Insurance must be taken in all properties.

Source: FEMA's Flood Insurance Rate Map (FIRM) Community Panel Number 225 203-0160 E dated 1984. (See Appendix D).

Environmental Justice - The proposed project will not adversely impact environmental conditions affecting low income or minority populations residing in the Target Area.

Source: The Environmental Justice Study prepared by USRM. (See Appendix M).

Part B. Environmental/Program Factors

Factors	Anticipated Impact/ Deficiencies			Source Documentation and Requirements for Approval
	None	Minor	Major	
25. Unique Natural Features and Areas	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Unique Natural Features – No unique natural features such as cliffs or bluffs are in the vicinity of the subject property. Further, there is no resource extraction activity in the affected area.
26. Site Suitability, Access, and Compatibility with Surrounding Development	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The site will retain its original residential land use which is compatible with the land use of the surrounding development. Source: PPM Phase I Environmental Site Assessment (See Appendix J)
27. Soil Stability, Erosion, and Drainage	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No slope was identified on the subject property during site reconnaissance. According to the US Geological Survey (USGS) 1998 topographic map titled "New Orleans East, LA", the property is relatively flat and at or just below sea level. No evidence of soil erosion was observed in the subject area. The Target Area is fully developed. During redevelopment, Best Management Practices will be utilized to minimize or eliminate any erosion during ground work. Soils within the Target Area are suitable for residential development. The Target Area has been developed with residential properties since prior to the 1940s.
28. Nuisances and Hazards (natural and built)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The project site currently contains vandalized and hurricane damaged boarded up structures that present a safety hazard to the immediate site and neighborhood. The buildings contain asbestos and lead-based paint. The proposed redevelopment will remove all blighted buildings. During demolition and reconstruction, the project will be fenced to restrict access to the local population.
29. Water Supply/ Sanitary Sewers	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Waste Water - Existing municipal sewage systems will be able to adequately service the proposed development. Construction run off will be controlled by BMPs. (Source: Bryan Jones, New Orleans Sewerage and Water Board.) Storm Water - Existing municipal stormwater disposal systems will be able to adequately service the proposed development. Construction run off will be controlled by BMPs. (Source: Bryan Jones, New Orleans Sewerage and Water Board.) Water Supply - 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.
30. Solid Waste Disposal	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The existing municipal solid waste disposal system will adequately service the proposed development. The contractor will manage the removal of construction debris. The site is in the current garbage collection route according to the City of New Orleans website, www.cityofno.com .

31. Schools, Parks, Recreation, and Social Services	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Open Space - Open space in the densely developed neighborhoods surrounding the property consists mostly of lawns. Adequate open common space is planned in the proposed redevelopment.</p> <p>Recreation - Armstrong Park, Hunter's Field Park and Warren Easton Park are located less than 1 mile southeast of the subject property.</p> <p>Cultural Facilities - The Carrollton Community Home, Gert Town Community Center and YMCA are a few of the community facilities located within two miles of the subject property. Cultural Facilities exist in surrounding areas. Several churches are in the vicinity, as well as Xavier University, are nearby.</p> <p>Education Facilities - Sufficient primary, secondary and higher educational facilities exist in the Target Area surrounding the subject property. The number of school aged students returning to the Target Area will not exceed the capacity of the existing schools. The immediate area contains the James Johnson Elementary, located 4 blocks from the site, which offers k-8 instruction as of 8/2006. McMain High School is the closest High School, and is open as of 8/2006. Source: www.nolapublicschools.net.</p> <p>Social Services - Numerous social services, including Volunteers of America, Daughters of Charity Services, and Gert Town Community Center are located within two miles of the subject property. City of New Orleans social services are readily available throughout the city. 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.</p>
32. Emergency Health Care, Fire and Police Services	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Public Safety, Police - New Orleans Police Department facilities are located less than one mile south of the subject property. Response time is within five minutes. (Source: the City of New Orleans website)</p> <p>Public Safety, Fire - New Orleans Fire Department facilities are located less than one mile south of the subject property. Response time is within five minutes. (Source: Interview with Officer on duty at Police Station and City of New Orleans website.)</p> <p>Emergency Health Care - Ochsner Hospital is located approximately four miles west of the subject property. Touro Hospital is located approximately three miles south of the subject property. Children's Hospital is located approximately four miles south of the subject property. Memorial Medical Center, which is partially open since Hurricane Katrina, is located two miles south of the subject property. Katrina related events have reduced the city capacity for medical care, but as the population returns, services return. Ochsner Foundation Hospital is four miles west from the site. Emergency health care will be readily available at the completion of the project. Response time within five minutes.</p> <p>Source: Interview with Medical Center of New Orleans officials. September 11, 2006.</p>
33. Commercial/ Retail and Transportation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Commercial Facilities - Orleans Avenue is a heavily commercially-developed roadway, and is located 0.2 mile north of the subject property. The proposed project will have no negative impact on commercial facilities.</p> <p>Transportation - The New Orleans Regional Transit Authority (RTA) has numerous bus lines that run along Orleans Avenue and North Claiborne Avenue. Customer demand diminished following Hurricane Katrina with the loss of population in the City. Bus service will increase as people return to the neighborhood. Construction traffic will be restricted to the major roadways.</p> <p>Source: the Regional Transit Authority's website, www.norta.com/routes.php</p>
34. Other	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Energy Consumption - The 77 structures slated for demolition were built in the 1940s and 1950s. The structures will be replaced with energy-efficient units designed to the current building codes. Additionally, fewer units will be built thereby reducing the demand for energy.</p>

SUMMARY OF FINDINGS AND CONCLUSIONS

Alternatives and Project Modifications Considered (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.)

No Action

The Lafitte Housing Development suffered extensive wind and flood damage from Hurricane Katrina. The properties functionally obsolete, contain asbestos and lead-based paint, energy inefficient, not ADA compliant and uninhabitable in their current state. Adopting a “no action” alternative would preserve buildings that are eligible for listing on the National Register of Historic Places but perpetuate physical blight in the site and surrounding neighborhood. Without demolition, the buildings are a safety threat, pose environmental hazards and are a nuisance to the surrounding community. Further, no replacement housing (new or rehabilitated) would be placed in the neighborhood. Consequently, the “no action” alternative is not feasible, as the continued physical blight would threaten the recovery of the area.

Demolition Only

Demolition of the project site would remove all physical blight but would not provide housing for displaced residents to return to. The lack of new/replacement housing units would negatively impact the City of New Orleans’ effort to recover from the destruction of Hurricane Katrina. This alternative, therefore, is undesirable.

To avoid this housing loss HANO developed a Recovery Plan for affordable housing for its residents that: (1) follows the broad goals of the HOPE VI program to de-concentrate poverty and provide mixed income communities; (2) provides housing that meets newly adopted City building codes, FEMA Advisory Base Flood Elevations and HUD standards for safe, decent housing; and (3) is cost effective and achievable within existing financial resources.

HANO has selected Providence/Enterprise to redevelop the Lafitte Housing Development site into a vibrant, mixed income community that will provide both affordable and market rate housing. Providence/Enterprise plans to redevelop the property providing 556 housing units on-site and, in later phases, an additional 256 units in the neighborhood (scattered sites).

ECM performed three cost estimates to evaluate the most cost effective option for the development: (1) repair and minor rehabilitation, (2) major rehabilitation and (3) new construction. The option of doing partial rehabilitation and new construction was not

considered a viable option because it was felt that the existing structures would retain the stigma of the "projects" including the association of crime, poverty and social distress. Even with complete rehabilitation, the existing structures would not match the scale and massing of the new construction which would be designed to integrate into the surrounding historic neighborhood.

Repair and Minor Rehabilitation

The first cost estimate addresses the immediate needs of the development in its current condition and involves simply improving the development to its condition before Hurricane Katrina and repairing other non-Katrina related deficiencies. The cost is approximately \$29,516,444.00, but does not include any cost to correct the observed code violations and other critical deficiencies indicated below:

- The receptacles in the bathrooms and kitchens are not GFCI type. The bedroom electrical circuit breakers are not AFCI, which is also code compliant. There are no outdoor weather-proof GFCI outlets. Power panels (inside and outside) are heavily corroded and should not be energized, this represent a severe fire hazard.
- Porches without railings (porches are thirty-four (34) inches from the ground) Refer to IBC (2003) - 1012.1 and NFPA 101-7.1.8 for the code requirement.
- Windows do not meet hurricane impact requirement per IBC (2003) – 1609.1.4 for the code requirement.
- The property does not meet the Uniform Federal Accessibility Standard (UFAS), which requires a minimum of five (5) percent of the units to be compliant with Section 504 of the Housing Act of 1973. Only demolition and new construction will ensure UFAS is complied with.
- Repair/Replacement of the roof substrate and wood trusses installed in a manner complying with IBC (2003) – 1507.2.7 for the wind speed requirements in this hurricane region.
- Lead Based Paint (LBP) Assessment. An assessment to specifically identify building components containing lead-based paint would be required in conjunction with a major repair or rehabilitation effort. The exterior iron balcony and porch rails have previously been identified as containing LBP and were encapsulated in the 1990s. However, the effects of Hurricane Katrina further deteriorated the encapsulation, such that additional remediation is required. The assessment may identify additional buildings containing lead-based paint that would require proper remediation.
- All walls separating the dwelling units shall be a fire-rated wall partition per IBC 708.1, #1 (2003). These fire-rated walls must extend to the underside of the roof decks.

Addressing the immediate needs of the Lafitte Development will require an expenditure of over \$29 million. However, after this expense, the buildings will still remain obsolete, environmental hazards will still be present, and the buildings would fail to meet the current required applicable codes and safety standards, would remain ADA noncompliant and energy inefficient. According to HUD guidelines, this level of limited improvement would restrict these buildings to be considered only as "housing of last resort" within the community. Major repair issues would remain requiring continued expenditures of limited PHA maintenance funds while providing only marginal quality housing. For these reasons, this alternative is not recommended.

Major Rehabilitation

The second cost estimate of approximately \$148,122,602.00 involves significant modernization of the buildings in order to meet current building codes, the Uniform Federal Accessibility Standards and HUD's Uniform Physical Condition Standard. This level of modernization would involve the complete demolition of all interiors, as well as roof replacement of all buildings, producing housing acceptable to the general public.

In order for the interior of the buildings to be demolished, the costs for abatement must also be added to the costs for bringing the building up to the federal code. USRM evaluated the costs associated with lead abatement, which are additional costs associated with modernization of the developments. The total lead abatement costs associated with modernization efforts is estimated to be \$970,549.00, which does not include build-back of removed building components. The costs were based on the procedures outlined in a lead abatement specification prepared by USRM, the amount of buildings, units, bedrooms, square footage of the units and the performance of clearance sampling after the completion of abatement activities. The total modernization cost is estimated to be \$149,093,151.00. Further, asbestos containing materials are present in the buildings that must be abated, which will include additional costs for removal, transportation and disposal.

The estimated repairs to the roof of each building, as provided following inspections by a roofing contractor will likely cost approximately \$5.9 million. However, the repairs of these roofs may present a problem due to non-availability of matching tiles. At present approximately one-third of the existing buildings have fiberglass shingles.

Modernization efforts will not address the inadequacy of the site to provide for defensible space, which in the past has made crime and security significant problems on this site. The site "super-block" configuration makes it difficult and costly to secure, hinders pedestrian circulation, and provides areas without the natural surveillance of the residents. The physical constraints of the site undermine the welfare of families and children living on the site. The inability to remedy basic site configuration problems will require increased maintenance and security staff to provide basic security for residents and staff working at the site. In the past, these deficiencies have mandated HANO to spend scarce funding resources on crime reduction and prevention.

The buildings themselves make reconfiguration inefficient and difficult due to the shallow building depth and awkward configuration of units and staircases. Repairing the buildings would not correct all deficiencies and rehabilitation would leave substrate and structural problems yet to be identified and be prohibitively expensive. Further, the unit sizes are no longer sufficient for today's family living needs in terms of space for families to appropriately interact and space needs of modern furniture and appliances. There is no technically feasible way to increase the size of the units without complete rehabilitation.

The buildings do not meet the FEMA Advisory Base Flood Elevations putting them at risk for future flooding and substantially increasing insurance costs. The site also does not provide adequate parking for residents. The housing units would remain functionally obsolete, energy inefficient and noncompliant with ADA requirements. As a result of the additional costs and physical drawbacks of modernization, this alternative is not recommended.

New Construction

The third cost estimate involves demolishing the entire development and constructing an entirely new development including site work, residences, infrastructure, sidewalks, parking, lighting and landscaping. This includes the development of scattered site units in the adjacent neighborhood Target Area. The third cost estimate would be approximately \$121,140,271.50. The cost of modernization is about 23 percent higher than the cost of total demolition and new construction. During demolition, the potential for the generation of dust (particulate matter) exists as the structures are demolished and as site activities proceed to include site grading, leveling and associated construction activities. To ensure that the potential dust generation does not impact the surrounding area, Best Management Practices (BMPs) will be drafted and utilized in all demolition and construction phases of the project. Additional environmental programs which incorporate the BMPs are the stormwater regulations. These regulations detail what practices should be followed for any construction site, which involves greater than 0.5 acres of land. Some of the BMPs proposed include, utilization of wetting agents and the use of silt fences to control dusts and erosion.

Additional issues involved in the demolition are the presence of asbestos and lead containing building materials. All asbestos abatement activities will be performed in accordance with LDEQ regulatory requirements. Lead removal measures will be required to be performed in accordance with HUD regulations and occupational laws. The proper documentation will be completed with the Louisiana Department of Environmental Quality (LDEQ) prior to the asbestos abatement, as well as for any lead abatement activities. It should be noted that environmental regulations regarding demolition activities for lead-based paint containing surfaces will likely not result in significant abatement activities as it will for modernization, but will result in dust control activities to be followed for loading, transportation, and disposal. All asbestos abatement, transport and disposal will be conducted in accordance with all local, state and federal regulations. Air monitoring will be conducted during abatement activities to

ensure the safety of the surrounding areas. No detrimental atmospheric effects on historic properties are expected from the proposed undertaking.

Based on the three cost estimates provided by ECM and the cost estimate for lead abatement and clearance added to the cost for modernization, the most cost effective and environmentally sound alternative is to demolish and rebuild these structures.

The alternative to raze and redevelop the project site and provide housing in the Target Area is considered the best option for the following reasons:

1. It is less costly to tear down the existing public housing units and build replacement units that modernize the project site.
2. New construction will eliminate the functional obsolescence and presence of lead and asbestos hazards from the project site.
3. New construction will enable the buildings to be energy efficient and ADA compliant.
4. New construction will result in larger floor space per unit than the existing public housing buildings have.
5. New construction will enable the developer to raise the elevation of the buildings to the recommended height as protection against the potential impact of future flooding.
6. The redevelopment option will decrease unit density and increase automobile and pedestrian access to the site.
7. The redevelopment option will decrease the concentration of low income residence in the area by providing mixed-income units in the Target Area, as well as to provide the opportunity for home ownership.
8. The amount of time needed to redevelop the site and Target Area is not significantly longer than modernizing the project site. Consequently, the length of time that the former residents will experience in being displaced until replacement units become available is appreciably similar.

The redevelopment plans will allow for the living area of the structures to be raised above the base flood elevation, thereby minimizing the risk of damage from future flooding events.

Another significant issue is the absence of required handicapped accessible units in the development. By federal law, five percent (or 45 units) of the total number of units (896) must be accessible units. The residential units scattered around the development will also be handicapped accessible. Accessible units should be of all unit types such as one, two, and three bedrooms. A minimum of sixteen (16) buildings would have to be gutted and completely rehabilitated because of the current interior layout of the units and the masonry wall construction. Gutting and completely rehabilitating the units will provide the proper layouts to meet the requirements of accessible units. There are also 34 buildings that have exit egress stairs that do not meet the code requirements for an egress

stair. It would be necessary to gut the interior of the 34 buildings to provide the space required for egress stairs. Due to these existing conditions, 50 out of the 79 buildings need to be gutted and rebuilt to meet UFAS and current code requirements.

Additional Studies Performed (Attach Study or Summary)

- A limited Phase I Environmental Site Assessment (ESA) was prepared for the Housing Authority of New Orleans by PPM Consultants, Inc. on June 15, 2006. (Appendix F).
- A comprehensive sediment investigation by the United States Environmental Protection Agency (USEPA), the Louisiana Department of Environmental Quality (LDEQ) and the National Resource Defense Council (NRDC)
- Historical testing and abatement of units at the Lafitte Housing Development for Lead Based Paint (LBP) provided by the Housing Authority of New Orleans.
- Section 106 Historic Preservation Review.
- Executive Order 11988 "Floodplain Management" analysis (8-Step Analysis)

Mitigation Measures Needed:

The Housing Authority of New Orleans proposes substantial improvements to the subject property. HANO has selected Providence/Enterprise to redevelop the Lafitte Housing Development site into a vibrant mixed income community to provide both affordable and market rate housing. Providence/Enterprise plans to redevelop the property providing 556 housing units on-site and, in later phases, an additional 256 units in the neighborhood (scattered sites). The redevelopment of the Lafitte Housing Development will not require the acquisition of any additional land for the first funded phase of development, but land will be acquired for subsequent development of scattered sites, which will be evaluated on a case-by-case basis for each property acquired. No impact to zoning or land use is expected from the proposed project. The goal of the project is to convert a conventional public housing development into a new, mixed-income and mixed-use community that includes rentals and home ownership units in New Orleans.

Rehabilitation cost is \$148,122,602.00 with an additional \$970,549.00 for abatement, and new construction cost is \$121,140,271.50. Rehabilitation cost is about 23% more than the new construction cost. As to the lead abatement and clearance costs these are not costs that would be incurred if demolition of the units were performed, as abatement of lead from the units would not be necessary.

Historically, this site has had a concentration of poverty and distress compounded by small cramped housing units with outdated mechanical systems and site design which exacerbated severe maintenance and security issues. This distress put public housing families at risk and spilled over into the adjoining neighborhood causing disinvestment

and undermined property values. Demolition and rebuilding is the logical and most cost effective remedy to ensure the viability of the Lafitte Housing Development.

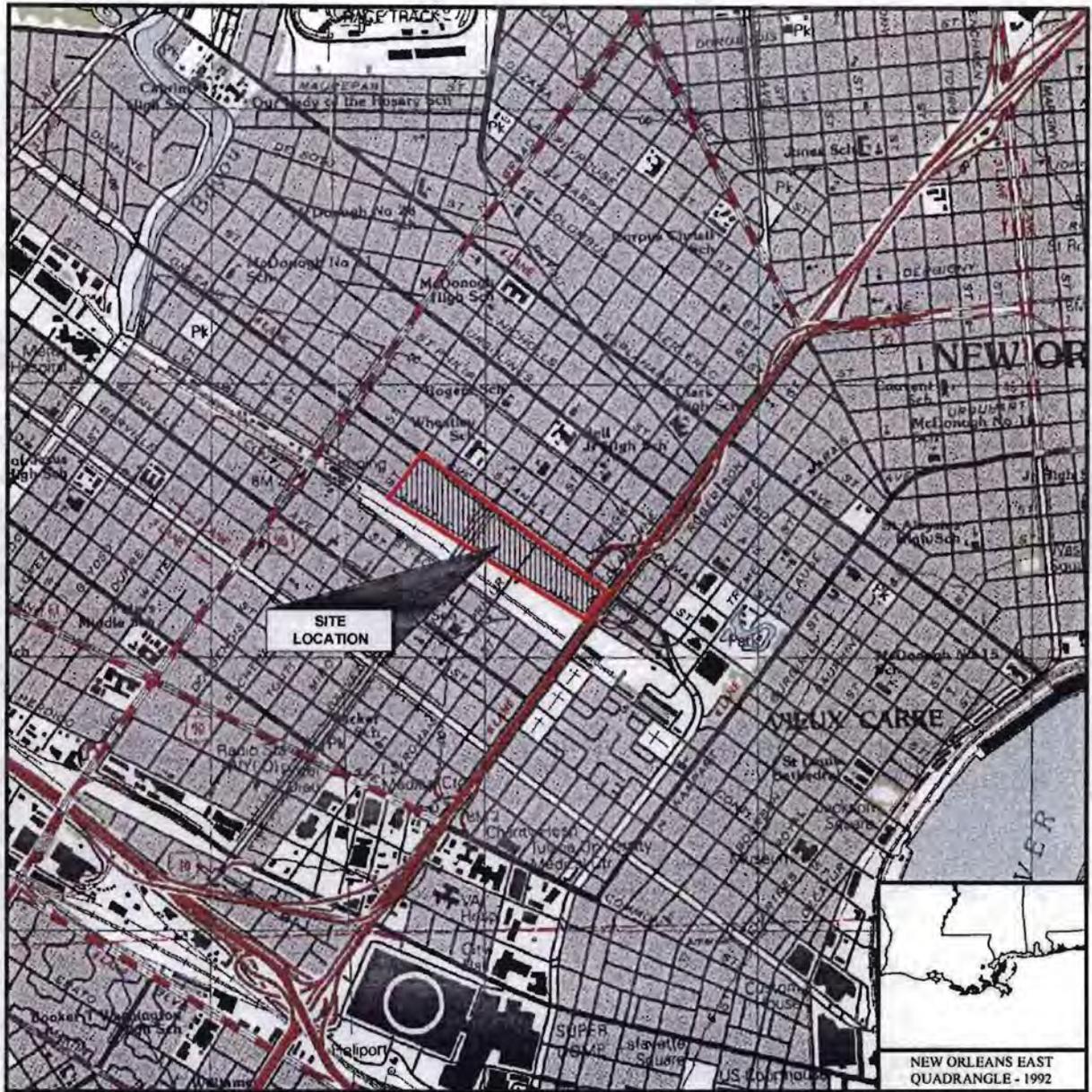
This site and all other HANO sites will soon be operated on Asset Based Management principles. Repairs would not correct all deficiencies. Rehabilitation would leave substrate and structural problems yet to be identified and be prohibitively expensive. Demolition is the correct remedy to ensure that the future residents and management of this site will live in safe, decent and sanitary housing.

The Louisiana Speaks Pattern Book may serve as a planning and design guide for the new community. The Louisiana Vernacular, Victorian, and Classical styles will be featured in a combination of double and multiplex buildings. Reconnecting the property with the surrounding neighborhood by re-establishing the public street grid and blending with the community character is a priority. In addition, all proposed construction design will be have prior approval from the SHPO and ACHP. This review will ensure that the new construction maintains the visual integrity of the neighborhoods and a positive visual impact will be afforded.

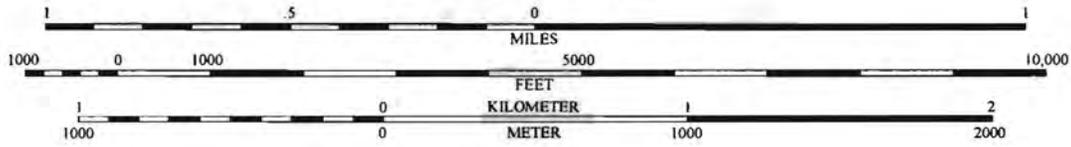
List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]

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/ancl2.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.

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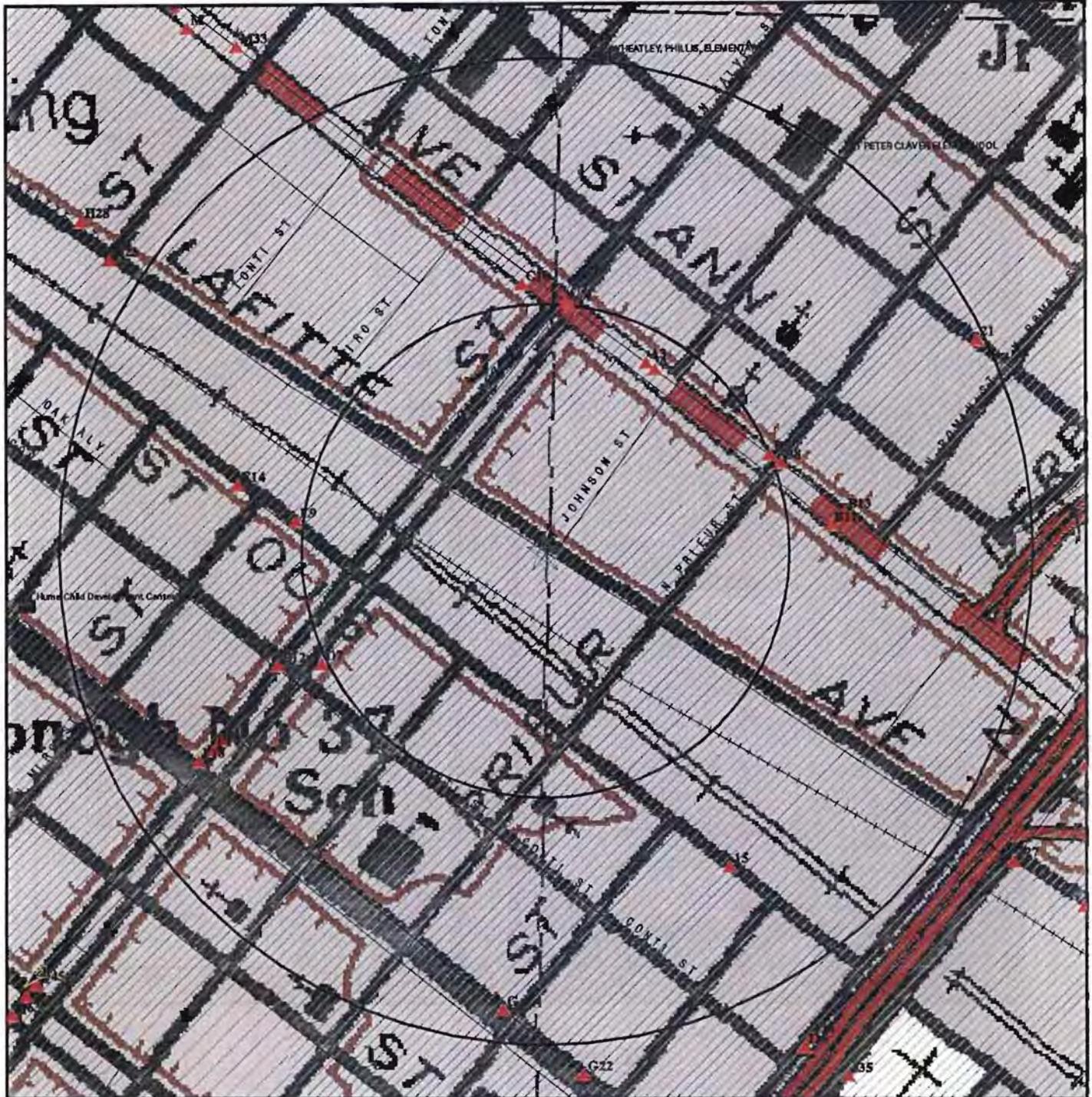
PPM PPM CONSULTANTS, INC.	
DRAWN BY: MH	DRAWN DATE: 6/20/06
PROJECT NUMBER: 2G0001	BILLING GROUP: ESA

**HOUSING AND URBAN
DEVELOPMENT
LAFITTE PROJECT
HANO PROJECT NO. LA001005
NEW ORLEANS, LOUISIANA**

SITE LOCATION MAP

FIGURE
NUMBER
1

DETAIL MAP - 1695900.2s

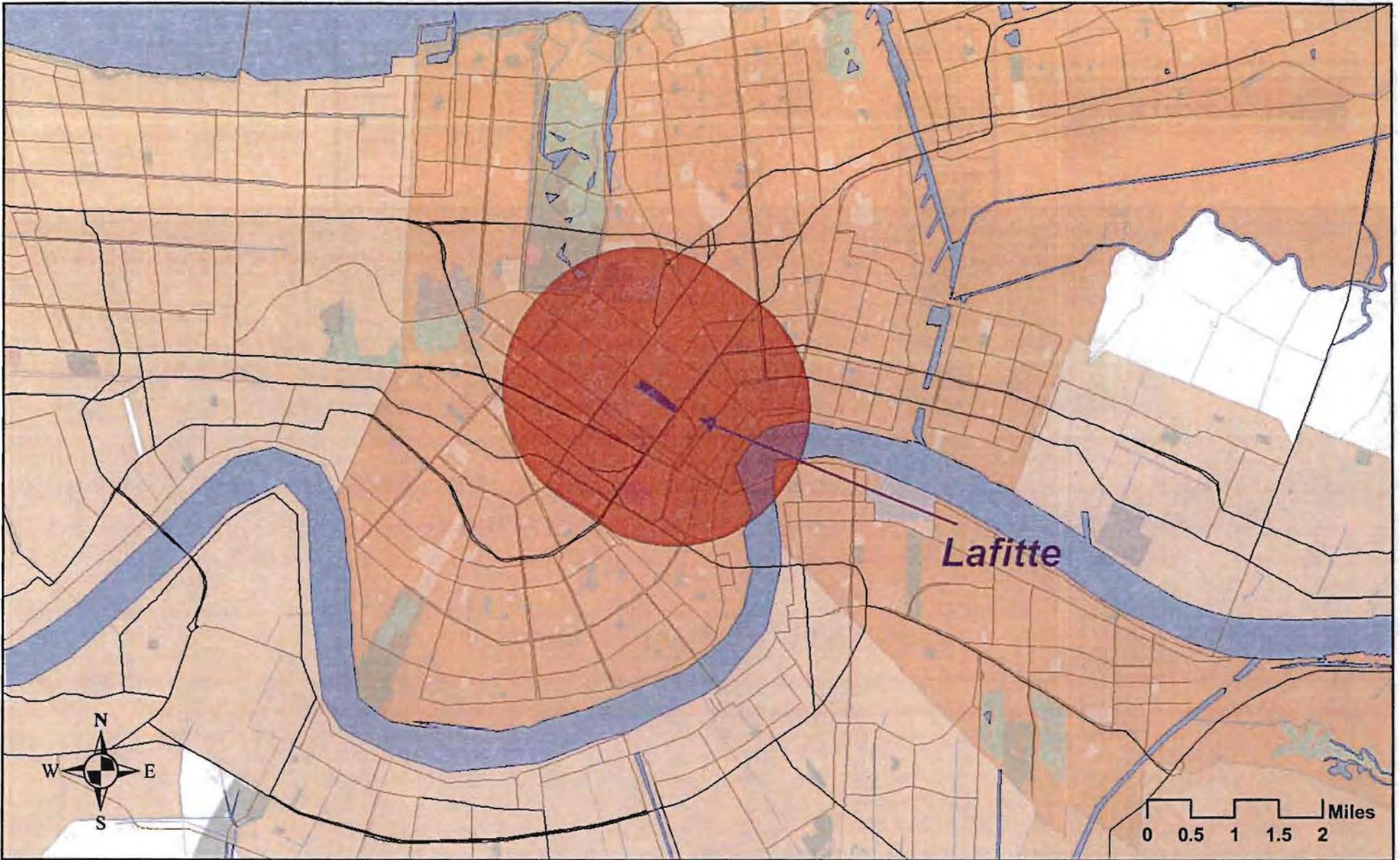


- ★ Target Property
- ▲ Sites at elevations higher than or equal to the target property
- ◆ Sites at elevations lower than the target property
- ▲ Manufactured Gas Plants
- ⚡ Sensitive Receptors
- National Priority List Sites
- Landfill Sites
- Dept. Defense Sites

- Indian Reservations BIA
- ▬ Oil & Gas pipelines
- ▨ 100-year flood zone
- ▩ 500-year flood zone

This report includes Interactive Map Layers to display and/or hide map information. The legend includes only those icons for the default map view.

<p>SITE NAME: Lafitte ADDRESS: 2101 Lafitte Street New Orleans LA 70116 LAT/LONG: 29.9655 / 90.0778</p>	<p>CLIENT: PPM Consultants Inc. CONTACT: Monica Holston INQUIRY #: 1695900.2s DATE: June 14, 2006</p>
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Housing Authority of New Orleans

Orleans Parish, Louisiana

Legend

-  Housing Development
-  Major Highways
-  Minor Highways



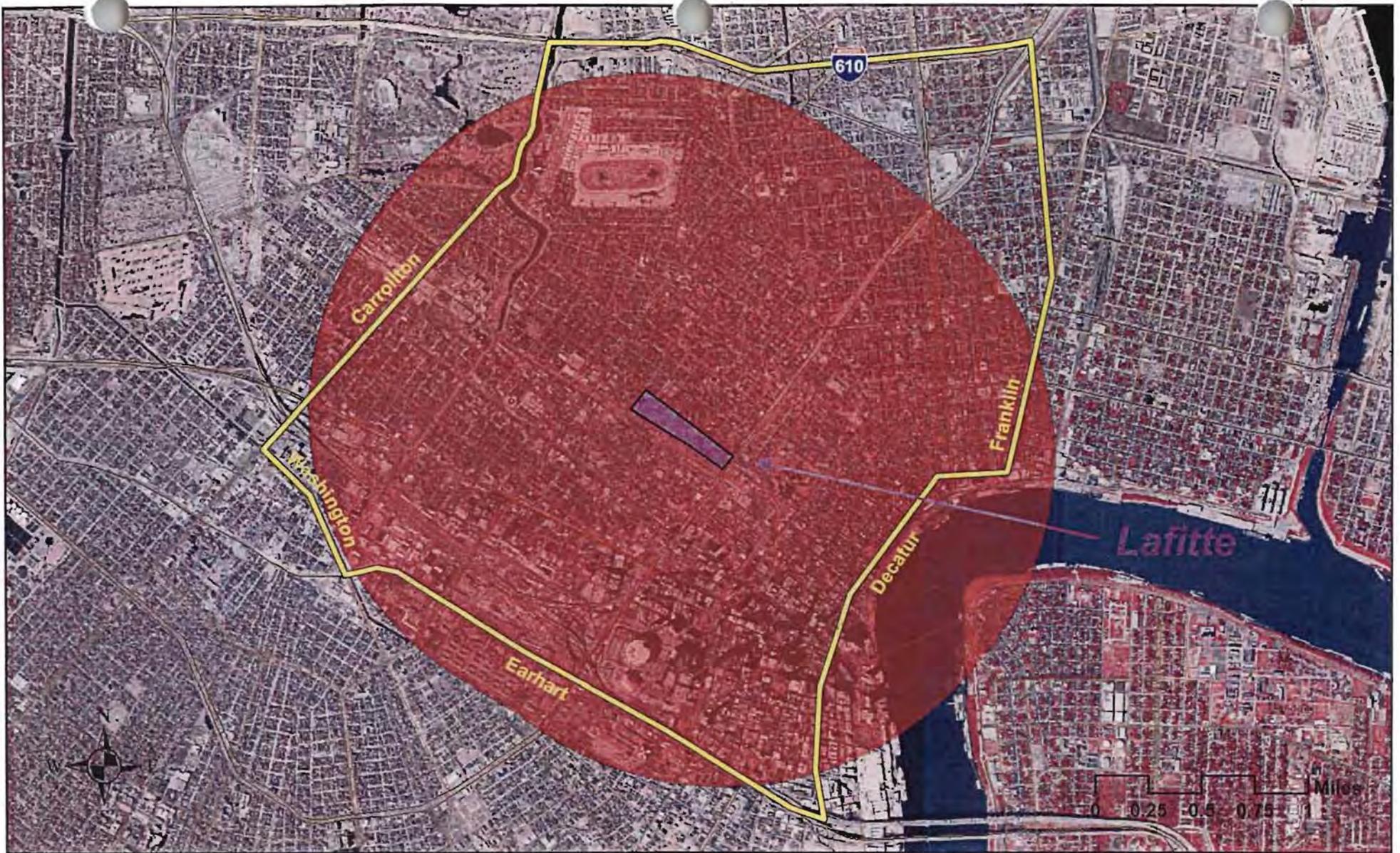
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Housing Authority of New Orleans
 Orleans Parish, Louisiana

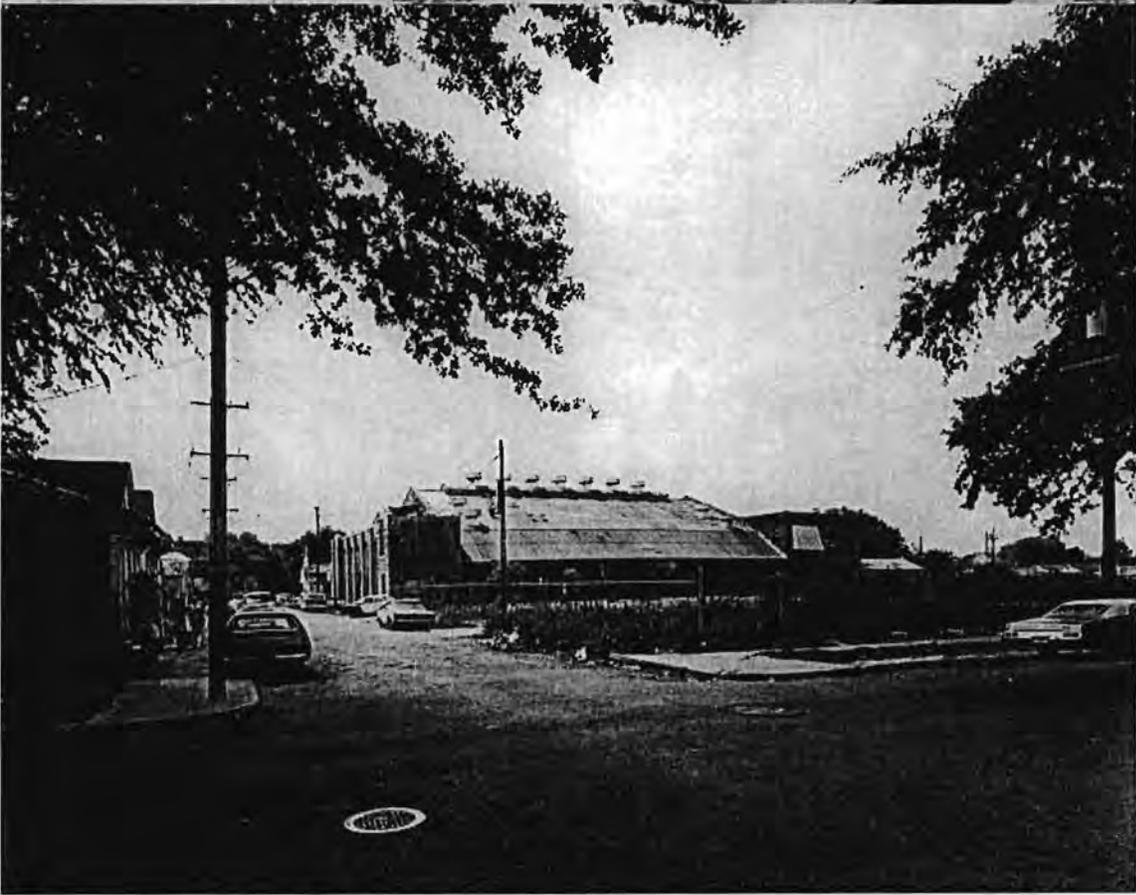
Legend

-  Housing Development
-  Major Highways
-  Minor Highways



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APPENDICES

APPENDIX A
COASTAL ZONE LETTER

State of Louisiana



KATHLEEN BABINEAUX BLANCO
GOVERNOR

SCOTT A. ANGELLE
SECRETARY

DEPARTMENT OF NATURAL RESOURCES
OFFICE OF COASTAL RESTORATION AND MANAGEMENT

June 28, 2006

Michael D. McCown, P.G.
Principal/Senior Geologist
PPM Consultants, Inc.
5555 Bankhead Highway
Birmingham, AL 35210

RE: C20060280, Coastal Zone Consistency
HUD
Direct Federal Action
Proposed Refurbishing/Demolition/Construction of various Public Housing Projects, Project
No. 2G001-ESA1, New Orleans, Louisiana

Dear Mr. McCown:

The above referenced projects have been reviewed for consistency with the approved Louisiana Coastal Resource Program (LCRP) as required by Section 307 of the Coastal Zone Management Act of 1972, as amended. I have determined that activities will be deemed to be consistent with the Louisiana Coastal Resources Program, and thus will require no further clearance from our office, if the proposed project meets any one of the following criteria:

- it is not within one of the 19 coastal parishes (see attached list);
- it is simply a loan to allow business operations to continue;
- it is to provide services such as administration, planning or technical expertise;
- it is for the repair of existing infrastructure and will not expand the footprint of the existing structures;
- it is within a Corps of Engineers-constructed hurricane protection levee;

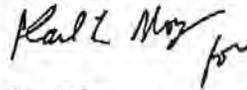
If a project does not meet one of these criteria, or if the project:

- is within the Louisiana Coastal Zone and involves dredging (any sort of digging), fill or land clearing (other than removal of storm debris)

then additional coordination with this office will be necessary. Information on the Coastal Use Permit application process can be found at <http://dnr.louisiana.gov/crm/coastmgt/coastmgt.asp>.

If you have any questions concerning this determination please contact Jeff Harris, Consistency Analyst at (225) 342-7591 or 1-800-267-4019.

Sincerely,



Jim Rives
Acting Administrator

JR/JH/bgm

cc: Venise Ortego, LDWF
Wynecta Fisher, Orleans Parish
Ron Ventola, COE-NOD

Raquel Murphy

From: Gregory DuCote [GregDu@dnr.state.la.us]
Sent: Tuesday, August 14, 2007 3:38 PM
To: Raquel Murphy
Cc: Jeff Harris
Subject: RE: Coastal Zone Management Plan Impacts

Raquel

I appreciate your prompt response to our conversation. Based on what I understand, i.e. that HUD and/or the City of New Orleans is going to raze several existing developments w/in the leveed/developed area of the City and the rebuild housing, I do not foresee any problems. I am forwarding your email, and this response, as a copy to Jeff Harris who will ask for any further information we need in order to fully respond to your inquiry.

Gregory J. DuCote
Interagency Affairs Section
Coastal Management Division
P.O. Box 44487
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—Original Message—

From: Raquel Murphy [mailto:rmurphy@us-risk.com]
Sent: Tuesday, August 14, 2007 3:31 PM
To: Gregory DuCote
Cc: Tracey Dodd
Subject: Coastal Zone Management Plan Impacts

Mr. Ducote:

The Housing Authority of New Orleans is proposing to undertake the task of demolishing four existing housing developments within Orleans parish and rebuilding new housing units on each development site as well as in the surrounding neighborhoods. The developments in question include the St. Bernard Housing Development, the C.J. Peete Housing Development, the B.W. Cooper Housing Development and the Lafitte Housing Development. All developments are located within New Orleans city limits.

Since the project will be partially sponsored by HUD, we have been requested to receive confirmation from the Department of Natural Resources that the projects in question will not impact the State of Louisiana's Coastal Zone Management Plan.

We would appreciate if you can reply to this email as confirmation of the above referenced activity. Please don't

8/14/2007

hesitate to contact me if you have any questions or require additional information.

Sincerely,

RAQUEL JUMONVILLE MURPHY
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8/14/2007

APPENDIX B
AIR QUALITY LETTER/MAP

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Air Nonattainment Area Redesignations

Section 107(d)(3) of the Clean Air Act (CAA) specifies procedures and requirements for changing an area's designation. These conditions are as follows:

- The Administrator has determined that the National Ambient Air Quality Standards (NAAQS) have been attained.
- The area in question has a fully approved implementation plan under Section 110(k) of the CAA.
- A determination has been made that the improvement in air quality is due to permanent and enforceable reductions in emissions.
- An approvable maintenance plan has been submitted as specified under Section

175A. This demonstration of maintenance includes continued ambient monitoring, retention of current control strategies, an emissions budget, and contingency measures to be implemented should the area experience future air quality problems. In some cases, the requirements for an emissions budget may be waived if certain criteria are met. This relaxed approach is known as a limited maintenance plan.

- All applicable requirements have been met under Section 110, concerning general SIP requirements, and Part D, concerning nonattainment plans.

Current Status:

Region 6 has redesignated the following areas to attainment for ozone since 1990:

Texas - Victoria County

Louisiana - the parishes of Beauregard, Grant, Lafayette, Lafourche**, St. James, St. Mary, Jefferson, Orleans, St. Charles, and St. Bernard, Pointe Coupee, and Calcasieu.

**Note! On November 18, 1994, the State of Louisiana submitted a maintenance plan and redesignation request for Lafourche Parish to EPA for approval. On August 12, 1995, EPA issued a direct final notice approving Louisiana's request. The EPA's redesignation policy includes language to address how EPA will respond to a monitored violation of the NAAQS prior to the effective date of a redesignation action. The ozone monitor in Lafourche Parish recorded a fourth exceedance of the ozone standard on August 27, 1995, during the 30-day comment period of EPA's approval action on the redesignation request. The EPA did not withdraw its approval of the redesignation action, and it took effect on October 10, 1995. The fourth exceedance was validated on January 10, 1996.

EPA's action to allow the redesignation to move forward in light of the fourth exceedance was in conflict with the statute and EPA policy, as well as other notices of disapproval promulgated by EPA for areas that had violated the NAAQS while their redesignation requests were pending. EPA, therefore, proposed to correct this error by changing the designation of Lafourche Parish to an ozone nonattainment area, and classifying it as an incomplete data area (62 FR 38237, July 17, 1997).

Section Chief - Thomas Diggs (214) 665-7214;

E-Mail: Diggs.Thomas@epamail.epa.gov

Section address:

U.S. EPA Region 6, 6PD-L

1445 Ross Avenue

Dallas TX 75202-2733

EPA Headquarters Home pages

1. [U.S. Environmental Protection Agency \(EPA\)](#)
2. [EPA Office of Air and Radiation \(OAR\)](#)
3. [EPA Office of Air Quality Planning and Standards \(OAQPS\)](#)
4. [EPA Office of Transportation and Air Quality](#)
5. [EPA Ozone transport assessment group \(OTAG\)](#)
6. [Technical Transfer Network](#)

State Web Sites [EXIT Disclaimer](#)

1. Texas Commission on Environmental Quality (TCEQ): <http://www.tceq.state.tx.us/>
 2. Louisiana Department of Environmental Quality (LDEQ): <http://www.deq.state.la.us>
 3. Oklahoma Department of Environmental Quality (ODEQ): <http://www.deq.state.ok.us>
 4. New Mexico Environment Department (NMED): <http://www.nmenv.state.nm.us>
 5. Arkansas Department of Environmental Quality (ADEQ):
<http://www.adeq.state.ar.us>
 6. City of Albuquerque, New Mexico: <http://www.cabq.gov>
-

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Last updated on Tuesday, August 14th, 2007.

<http://www.epa.gov/earth1r6/6pd/air/pd-1/non.htm>

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Criteria Pollutant Area Summary Report

As of March 02, 2006

<i>State: Simple Name</i> <i>Pollutant</i>	<i>Nonattainment Area Name</i>	<i>Population</i> <i>(1000s)</i>	<i>Number of</i> <i>Counties</i>	<i>Classification</i>
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),	8-Hr Ozone	Amador and Calaveras Cos (Central Mtn), CA	76	2	Subpart 1
CA: Chico	8-Hr Ozone	Chico, CA	203	1	Subpart 1
CA: Imperial County	8-Hr Ozone	Imperial Co, CA	142	1	Marginal
	PM-10	Imperial Valley, CA	120	1	Serious
CA: Kern Co (Eastern Kern)	8-Hr Ozone	Kern Co (Eastern Kern), CA	99	1	Subpart 1
CA: Los Angeles-San Bernardino Cos(W Mojave)	8-Hr Ozone	Los Angeles-San Bernardino Cos(W Mojave), CA	656	2	Moderate
	PM-10	Coachella Valley, CA	182	1	Serious
	PM-10	San Bernardino Co, CA	199	1	Moderate
CA: Los Angeles-South Coast Air Basin	Carbon Monoxide	Los Angeles South Coast Air Basin, CA	14,594	4	Serious
	8-Hr Ozone	Los Angeles South Coast Air Basin, CA	14,594	4	Severe 17
	PM-10	Los Angeles South Coast Air Basin, CA	14,594	4	Serious
	PM-2.5	Los Angeles-South Coast Air Basin, CA	14,594	4	Nonattainment
CA: Mariposa and Tuolumne Cos (Southern Mtn)	8-Hr Ozone	Mariposa and Tuolumne Cos (Southern Mtn), CA	72	2	Subpart 1
CA: Mono County	PM-10	Mono Basin, CA	0	1	Moderate
CA: Nevada Co. (Western Part)	8-Hr Ozone	Nevada Co. (Western Part), CA	78	1	Subpart 1
CA: Owens Valley	PM-10	Owens Valley, CA	7	1	Serious
CA: Riverside Co, (Coachella Valley)	8-Hr Ozone	Riverside Co, (Coachella Valley), CA	325	1	Serious
CA: Sacramento Metro	8-Hr Ozone	Sacramento Metro, CA	1,978	6	Serious
	PM-10	Sacramento Co, CA	1,223	1	Moderate
CA: San Diego	8-Hr Ozone	San Diego, CA	2,813	1	Subpart 1
CA: San Francisco-Bay Area	8-Hr Ozone	San Francisco Bay Area, CA	6,542	9	Marginal
CA: San Joaquin Valley	8-Hr Ozone	San Joaquin Valley, CA	3,191	8	Serious
	PM-10	San Joaquin Valley, CA	3,080	7	Serious
	PM-2.5	San Joaquin Valley, CA	3,191	8	Nonattainment
CA: Searles Valley	PM-10	Coso Junction, CA	7	1	Moderate
	PM-10	Trona, CA	4	1	Moderate

CA: Sutter Co (Sutter Buttes)					
8-Hr Ozone	Sutter Co (Sutter Buttes), CA	0	1	Subpart 1	
CA: Ventura County					
8-Hr Ozone	Ventura Co, CA	753	1	Moderate	
CO: Denver-Boulder-Greeley-Ft Collins-Love.					
8-Hr Ozone	Denver-Boulder-Greeley-Ft Collins-Love., CO	2,812	9	Subpart 1 EAC	
CT: Greater Connecticut					
8-Hr Ozone	Greater Connecticut, CT	1,544	5	Moderate	
DC-MD-VA: Washington					
8-Hr Ozone	Washington, DC-MD-VA	4,452	15	Moderate	
PM-2.5	Washington, DC-MD-VA	4,378	14	Nonattainment	
GA: Atlanta					
8-Hr Ozone	Atlanta, GA	4,228	20	Marginal	
PM-2.5	Atlanta, GA	4,232	22	Nonattainment	
GA: Macon					
8-Hr Ozone	Macon, GA	154	2	Subpart 1	
PM-2.5	Macon, GA	155	2	Nonattainment	
GA: Murray County (Chattahoochee Nat. Forest Mtns)					
8-Hr Ozone	Murray Co (Chattahoochee Nat Forest), GA	1	1	Subpart 1	
GA: Rome, GA					
PM-2.5	Rome, GA	91	1	Nonattainment	
GU: Piti Power Plant					
SO2	Piti, GU	1	1	Primary	
GU: Tanguisson Power Plant					
SO2	Tanguisson, GU	1	1	Primary	
ID: Bonner County (Sandpoint)					
PM-10	Bonner Co (Sandpoint), ID	37	1	Moderate	
ID: Pocatello					
PM-10	Portneuf Valley, ID	66	2	Moderate	
PM-10	Fort Hall Reservation, ID	1	2	Moderate	
ID: Shoshone County					
PM-10	Shoshone Co, ID	10	1	Moderate	
PM-10	Pinehurst, ID	2	1	Moderate	
IL-IN: Chicago-Gary-Lake County					
8-Hr Ozone	Chicago-Gary-Lake County, IL-IN	8,758	10	Moderate	
PM-2.5	Chicago-Gary-Lake County, IL-IN	8,758	10	Nonattainment	
IN: Evansville					
PM-2.5	Evansville, IN	277	6	Nonattainment	
IN: Fort Wayne					
8-Hr Ozone	Fort Wayne, IN	332	1	Subpart 1	
IN: Indianapolis					
8-Hr Ozone	Indianapolis, IN	1,607	9	Subpart 1	
PM-2.5	Indianapolis, IN	1,329	5	Nonattainment	
IN: La Porte County					

	8-Hr Ozone	La Porte, IN	110	1	Marginal
IN:	South Bend-Elkhart				
	8-Hr Ozone	South Bend-Elkhart, IN	448	2	Subpart 1
KY-IN:	Louisville				
	8-Hr Ozone	Louisville, KY-IN	968	5	Subpart 1
	PM-2.5	Louisville, KY-IN	939	5	Nonattainment
LA:	Baton Rouge				
	8-Hr Ozone	Baton Rouge, LA	636	5	Marginal
MA:	Boston-Lawrence-Worcester (E. Mass)				
	8-Hr Ozone	Boston-Lawrence-Worcester (E. MA), MA	5,534	10	Moderate
MA:	Springfield (Western Mass)				
	8-Hr Ozone	Springfield (Western MA), MA	815	4	Moderate
MD:	Baltimore				
	8-Hr Ozone	Baltimore, MD	2,512	6	Moderate
	PM-2.5	Baltimore, MD	2,512	6	Nonattainment
MD:	Kent County and Queen Anne's County				
	8-Hr Ozone	Kent and Queen Anne's Cos, MD	60	2	Marginal
MD:	Washington County (Hagerstown), MD				
	8-Hr Ozone	Washington Co (Hagerstown), MD	132	1	Subpart 1 EAC
	PM-2.5	Martinsburg, WV-Hagerstown, MD	208	2	Nonattainment
ME:	Hancock, Knox, Lincoln & Waldo Cos				
	8-Hr Ozone	Hancock, Knox, Lincoln & Waldo Cos, ME	92	4	Subpart 1
ME:	Portland				
	8-Hr Ozone	Portland, ME	457	4	Marginal
MI:	Allegan County				
	8-Hr Ozone	Allegan Co, MI	106	1	Subpart 1
MI:	Benton Harbor				
	8-Hr Ozone	Benton Harbor, MI	162	1	Subpart 1
MI:	Benzie County				
	8-Hr Ozone	Benzie Co, MI	16	1	Subpart 1
MI:	Cass County				
	8-Hr Ozone	Cass Co, MI	51	1	Marginal
MI:	Detroit-Ann Arbor-Flint				
	8-Hr Ozone	Detroit-Ann Arbor, MI	4,932	8	Marginal
	PM-2.5	Detroit-Ann Arbor, MI	4,833	7	Nonattainment
MI:	Flint				
	8-Hr Ozone	Flint, MI	524	2	Subpart 1
MI:	Grand Rapids				
	8-Hr Ozone	Grand Rapids, MI	813	2	Subpart 1
MI:	Huron County				
	8-Hr Ozone	Huron Co, MI	36	1	Subpart 1
MI:	Kalamazoo-Battle Creek				
	8-Hr Ozone	Kalamazoo-Battle Creek, MI	453	3	Subpart 1
MI:	Lansing-East Lansing				