



FEMA

U.S. Department of Homeland Security
Louisiana Recovery Office
1 Seine Court, 4th Floor
New Orleans, Louisiana 70114

**DRAFT FINDING OF NO SIGNIFICANT IMPACT
FOR THE
RELOCATION OF ALEXANDER MILNE HOME FOR WOMEN
NEW ORLEANS AND ST. TAMMANY, LOUISIANA
*FEMA-1603-DR-LA***

BACKGROUND

Alexander Milne Home for Women (AMHW) is a nonprofit organization which serves the needs of mentally/physically challenged women. In 1839, AMHW was started through a donation for the purpose of opening a home for orphaned and disabled girls from Alexander Milne. In 1918, the Milneburg Asylum for Mental Defective Women was opened as the first institution for mentally challenged women in Louisiana. In 1920, the organization moved to the Gentilly location where it operated until being displaced by Hurricane Katrina in 2005. The AMHW was located at 1913 Gentilly Boulevard, New Orleans, Louisiana (Figure 2). The facility included eight (8) multi-purpose structures which served as home for developmentally disadvantaged women in dormitory style living quarters. Most residents resided at AMHW their entire lives. Currently, the home is operating from temporary facilities located in Laurel, Mississippi.

In accordance with 44 CFR Part 10, FEMA's regulations to implement the National Environmental Policy Act (NEPA), an Environmental Assessment (EA) was prepared. The purpose of the EA was to analyze the potential environmental impacts associated with the relocation of AMHW and to determine whether to prepare an Environmental Impact Statement (EIS) or Finding of No Significant Impact (FONSI). The need for the proposed project is to restore permanent facilities to accommodate the special needs of AMHW's residents. The alternatives considered include 1) No Action Alternative; 2) Alternative 2 - Permanently Relocate the AMHW to a Location in Laurel, Mississippi; 3) Alternative 3 – (Preferred) Construct a New Facility at an Alternate Site in St. Tammany Parish; and 4) Alternative 4 - Reconstruct the Facilities to its Pre-Katrina capacity.

AMHW seeks FEMA Public Assistance (PA) federal grant funds to replace eligible facilities lost at the Gentilly Boulevard location with alternate facilities. After analyzing the alternatives, the Alternative to Permanently Relocate to Laurel, Mississippi was dismissed from further consideration. The applicant is unable obtain the necessary permits to continue operations at the location in Mississippi. In addition, AMHW was originally established to provide services to the women in the state of Louisiana, as such, the organization would like to return.

The applicant currently owns 50 undeveloped acres off of Highway 21 in Covington, Louisiana (30.54994, -90.018759) where they are proposing to construct the new AMHW complex. The facility would be designed to house 48 developmentally disadvantaged women. The current site plans include the construction of a water well, sewerage pump station, retention pond, driveways, parking, etc. The applicant proposes to develop the eastern most 17 acres and leave the western 29.3 acres undeveloped, with the exception of land needed to construct a driveway from Highway 21 to the facilities in the rear of the property. The small 3.8 acre tract of land to the north of the developed area would also be left undeveloped.

FINDINGS

FEMA has evaluated the proposed project for significant adverse impacts to geology, soils, water resources (surface water, groundwater, and wetlands), floodplains, coastal resources, air quality, biological resources (vegetation, fish and wildlife, Federally-listed threatened or endangered species and critical habitats), cultural resources, socioeconomics (including minority and low income populations), safety, noise, and hazardous materials. The results of these evaluations as well as consultations and input from other federal and state agencies are presented in the EA.

CONDITIONS

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

- The project is in close proximity and directly adjacent to jurisdictional wetlands as per documentation provided by the USACE. Extreme care should be taken during the construction process through the appropriate use and maintenance of Best Management Practices (BMP's).
- Erosion Control Devices (ECD's) such as silt fencing, hay bales, sediment traps, etc. should be **used and maintained extensively** to prevent any potential direct or indirect adverse impacts to nearby wetland areas per the Clean Water Act and EO 11990.
- Potential concerns include but are not limited to silting-in and contamination from spills.
- Proper signage is suggested to clearly identify the adjacent wetland boundaries to help prevent any potential adverse impacts from construction vehicles/equipment/supplies accidentally leaving the boundaries of the approved Right of Way.
- Any adverse impacts to adjacent wetlands resulting from the construction of this project will jeopardize receipt of federal funding.

- Applicant is required to coordinate with the local floodplain administrator regarding building permits, clearances, drainage studies, etc. All correspondence must be forward to FEMA and FEMA-EHP for inclusion in the project files.
- Per St. Tammany Ordinance Calendar No: 4446 Ordinance Council Series No: 11-2425 “8. A hydrological analysis of both pre-development and post-development runoff shall be provided...” Applicant must ensure compliance with all parish and city ordinances. All correspondence must be submitted to FEMA and FEMA-EHP for inclusion in the project files. Should the site plans (including drainage design) change the applicant must submit changes to FEMA-EHP for review and approval prior to the start of construction.
- Per Ordinance Calendar NO. 4295 Ordinance Council Series NO 10-2275AA “1. All commercial, industrial, institutional, and multi-family development for town houses, apartments, condominiums, and nursing homes uses that require a building permit shall submit a drainage and paving plan with the permit application...” Applicant must ensure compliance with all parish and city ordinances. All correspondence must be submitted to FEMA and FEMA-EHP for inclusion in the project files. Should the site plans (including drainage design) change the applicant must submit changes to FEMA-EHP for review and approval prior to the start of construction.
- Appropriate signage and barriers must be in place prior to construction activities in order to alert pedestrians and motorists of project activities and traffic pattern changes, and to minimize potential adverse public safety concerns.
- The contractor will be responsible for keeping all excavated areas periodically sprayed with water, all equipment maintained in good working order, and all construction vehicles would be limited to 15 mph to minimize pollution/fugitive dust.
- Please be advised that water softeners generate wastewaters that may require special limitations depending on local water quality considerations. If the water system improvements include water softeners, the applicant is advised to contact the LDEQ Water Permits to determine if special water quality-based limitations will be necessary.
- Any changes or modifications to the proposed project will require a revised determination. Off-site locations of activities such as borrow, disposals, haul-and- detour roads, and work mobilization site developments may be subject to United States Army Corps of Engineers (USACE) regulatory requirements. Department of the Army Section 404 permit will be required prior to the deposition or distribution of dredged or fill material into the wetland.
- All precautions should be observed to protect the groundwater of the region.

- If any solid or hazardous wastes, or soils and/or groundwater contaminated with hazardous constituents are encountered during the project, notification to LDEQ's Single-Point-of-Contact (SPOC) at (225) 219-3640 is required. Additionally, precautions should be taken to protect workers from these hazardous constituents.
- If a bald eagle or its nest is spotted within 1,500 feet of the project site during the months of October through mid-May, the applicant must cease construction activities and contact Louisiana Department of Wildlife and Fisheries (LDWF) and United States Fish and Wildlife Service (USFWS) immediately. All correspondence must be documented and remain in the project permanent files.
- If hazardous materials are unexpectedly encountered in the project area during the proposed construction operations, appropriate measures for the proper assessment, remediation, management and disposal of the contamination would be initiated in accordance with applicable federal, state, and local regulations. The contractor is required to take appropriate measures to prevent, minimize, and control the spill of hazardous materials in the construction area.
- The contractor must implement traffic control measures, as necessary.
- To minimize worker and public health and safety risks from project construction and closure, all construction and closure work would be done using qualified personnel trained in the proper use of construction equipment, including all appropriate safety precautions. Additionally, all activities would be conducted in a safe manner in accordance with the standards specified in Occupational Safety and Health Administration (OSHA) regulations and the USACE safety manual.
- If human bone or unmarked grave(s) are present with the project area, 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 (24) 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.
- If during the course of work, archaeological artifacts (prehistoric or historic) 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 State Historic Preservation Office/Officer (SHPO).
- Any fill or borrow material used must be sourced from areas that do not contain any buried cultural materials (e.g. brick foundations, prehistoric Indian artifacts, human burials, and the like).

- Failure to comply with these conditions may make part or the entire project ineligible for FEMA funding.

CONCLUSIONS

Based upon the incorporated EA, and in accordance with Presidential Executive Orders 12898 (Environmental Justice), 11988 (Floodplain Management), and 11990 (Wetland Protection), FEMA has determined that the preferred action implemented with the conditions and mitigation measures outlined above and in the EA will not have any significant adverse effects on the quality of the natural and human environment. As a result of this FONSI, an EIS will not be prepared (44 CFR Part 10.8) and the preferred action alternative as described in the EA may proceed.

APPROVALS

Kevin Jaynes,
Regional Environmental Officer (REO)
Region VI

Date

Andre Cadogen
Deputy Director, Programs
Louisiana Recovery Office
FEMA 1603-1607-DR-LA

Date