

Draft Environmental Assessment  
**Alexander Milne Home for Women**  
New Orleans, Louisiana, Orleans Parish  
DR-1603-LA  
April 2013



**FEMA**

**U.S. Department of Homeland Security  
Federal Emergency Management Agency, Region VI  
Louisiana Recovery Office  
New Orleans, Louisiana 70114**

## TABLE OF CONTENTS

<b><u>SECTION</u></b>	<b><u>PAGE</u></b>
<b>1.0 INTRODUCTION</b>	1
1.1 Project Authority	1
1.2 Background	1
<b>2.0 PURPOSE AND NEED</b>	3
2.1 Purpose	3
2.2 Need	3
<b>3.0 ALTERNATIVES</b>	3
3.1 Alternative 1: No Action	3
3.2 Alternative 2: Relocate the AMHW to Laurel, Mississippi	3
3.3 Alternative 3: Relocate the AMHW to St. Tammany Parish	4
3.4 Alternative 4: Replace the AMHW at the Original Location	8
<b>4.0 AFFECTED ENVIRONMENT AND IMPACTS</b>	9
4.1 Impact Summary	9
4.2 Geology and Soils	19
<b>5.0 CUMULATIVE IMPACTS</b>	21
<b>6.0 CONDITIONS AND MITIGATION MEASURES</b>	22
<b>7.0 PUBLIC INVOLVEMENT</b>	25
<b>8.0 AGENCY COORDINATION</b>	25
<b>9.0 LIST OF PREPARERS</b>	25
<b>10.0 REFERENCES</b>	25
<b>LIST OF FIGURES</b>	
Figure 1: Orleans Parish, Louisiana	2
Figure 2: Original Site of AMHW, 1913 Gentilly Blvd, New Orleans, La	2
Figure 3: AMHW Change of Location Map	5
Figure 4: Preferred Location of AMHW on Hwy 21, Covington	6
Figure 5: Mid-Story Growth of Western 30 Acres	7
Figure 6: Current Conditions of Preferred Site Where Cottages Would Be Constructed	7
Figure 7: AMHW Preferred Site Layout	8
<b>LIST OF TABLES</b>	
Table 1 - Affected Environment and Environmental Consequences Matrix	10
<b>APPENDICES</b>	
Site Photographs	Appendix A
Site Plans for Preferred Alternative	Appendix B
Agency Correspondence	Appendix C
Other Information	Appendix D

## LIST OF ACRONYMS

AMHW	Alexander Milne Home for Women
BMP	Best Management Practices
CAA	Clean Air Act
CBRS	Coastal Barrier Resources System
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CWA	Clean Water Act
DA	Department of the Army
DFIRM	Digital Flood Insurance Rate Map
EA	Environmental Assessment
EIS	Environmental Impact Statement
EO	Executive Order
EPA	Environmental Protection Agency
FEMA	Federal Emergency Management Agency
FONSI	Finding of No Significant Impact
FPPA	Farmland Protection Policy Act
GOHSEP	Governor's Office of Homeland Security and Emergency Preparedness
JD	Jurisdictional Determination
LDEQ	Louisiana Department of Environmental Quality
LDNR	Louisiana Department of Natural Resources
LDWF	Louisiana Department of Wildlife and Fisheries
LPDES	Louisiana Pollutant Discharge Elimination System
NEPA	National Environmental Policy Act
NFIP	National Flood Insurance Program
NRCS	Natural Resources Conservation Services
OSHA	Occupational Safety and Health Administration
PA	Public Assistance
RCRA	Resource Conservation and Recovery Act
RHA	Rivers and Harbors Act
Sf	Square Foot
SHPO	State Historic Preservation Office/Officer
SOV	Solicitation of Views
SPOC	Single-Point-of-Contact
SWPPP	Storm Water Pollution Prevention Plan
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
USDA	United States Department of Agriculture

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## **1.0 INTRODUCTION**

### **1.1 Project Authority**

Hurricane Katrina, a Category 4 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 George W. Bush declared a major disaster for the state of Louisiana due to damages from Hurricane Katrina and 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), PL 93-288, as amended. Section 406 of the Stafford Act authorizes FEMA's Public Assistance (PA) Program to repair, restore, and replace state and local government and certain Private Nonprofit facilities damaged as a result of the declared event.

This Environmental Assessment (EA) is being prepared in compliance with the National Environmental Policy Act of 1969 (NEPA), the President's Council on Environmental Quality (CEQ) regulations implementing NEPA (Title 40 of the Code of Federal Regulations [CFR] Parts 1500 to 1508), and FEMA's regulations implementing NEPA (44 CFR Parts 9 and 10). The purpose of this EA is to analyze potential environmental impacts of the proposed project. FEMA will use the findings in this EA to determine whether to prepare an Environmental Impact Statement or a Finding of No Significant Impact (FONSI).

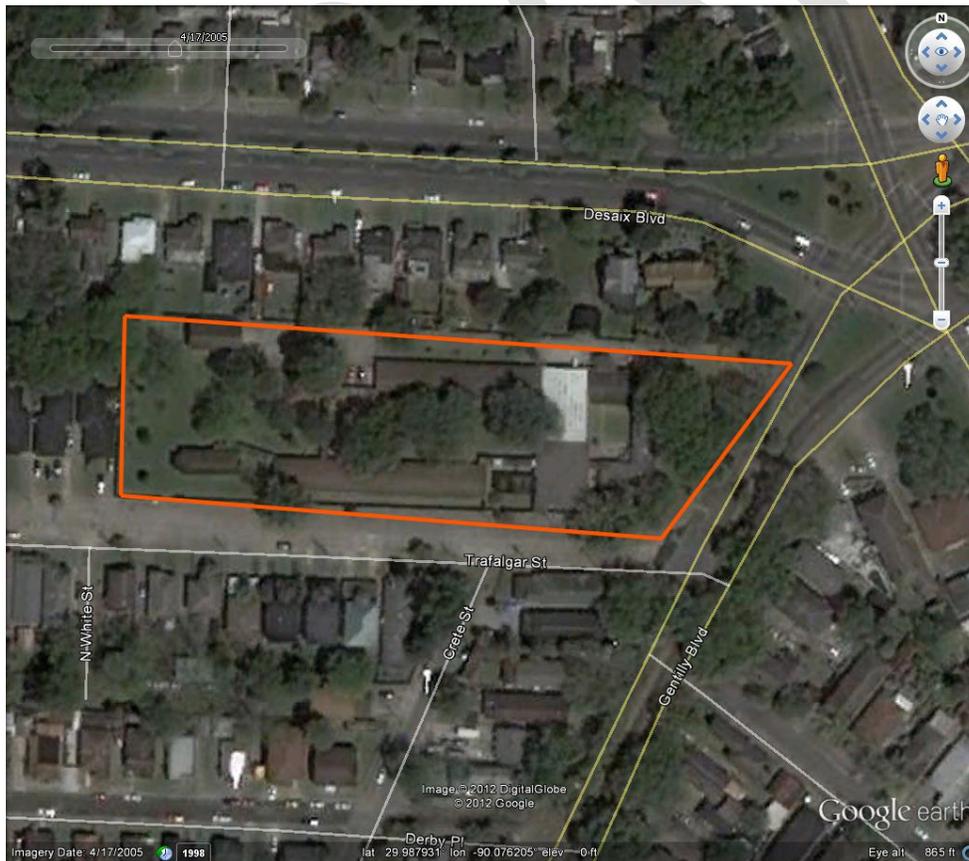
### **1.2 Background**

Orleans Parish, which is comprised of the City of New Orleans, is located in southeast Louisiana. It is approximately 350 square miles, of which approximately 180 square miles (approximately 51.5 percent) is land, the remainder is open water (Figure 1). Orleans Parish is bordered to the east by Lake Borgne, St. Bernard Parish, and Plaquemines Parish; to the south by the Mississippi River, Plaquemines Parish, and Jefferson Parish; to the west by Jefferson Parish; and to the north by Lake Pontchartrain and St. Tammany Parish. Orleans Parish has approximately 343,829 people according to 2010 census figures. New Orleans is located approximately 70 miles from Baton Rouge, the capital of Louisiana, and approximately 105 miles upriver from the Gulf of Mexico.

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.



**Figure 1: Orleans Parish, Louisiana, Site Location Map**



**Figure 2: Original Site of AMHW, 1913 Gentry Blvd, New Orleans, LA**

## **2.0 PURPOSE AND NEED**

### **2.1 Purpose**

The objective of the PA Program is to provide assistance to State, Tribal, and local governments, and certain types of Private Nonprofit organizations so that communities can quickly respond to and recover from major disasters or emergencies. The purpose of the project is to restore services, facilities, and resources for developmentally disadvantaged women that were lost as a result of Hurricane Katrina.

### **2.2 Need**

Wind, rain, and flooding of Hurricane Katrina destroyed the AMHW. As a temporary measure, AMHW has been operating facilities located in Laurel, MS. The AMHW is in need of permanent facilities to accommodate the special needs of its residents.

## **3.0 ALTERNATIVES CONSIDERED**

### **3.1 Alternative 1: No Action**

Implementation of the No Action Alternative would entail no public assistance measures for the damaged facilities. Consequently, the home would be left completely destroyed. The applicant would no longer have the ability to provide services, facilities, and resources to the developmentally disadvantaged women they serve.

### **3.2 Alternative 2: Relocate the AMHW to Laurel, Mississippi**

As part of AMHW's emergency evacuation plan, 54 residents and 46 employees retreated to Glade Baptist Church in Laurel, MS. Once the extent of the damages to the facilities in Louisiana was realized, the applicant decided it was necessary to find a more suitable long term temporary facility. The applicant located and purchased an abandoned assisted living home, The Old Davidson Rest Home, in Laurel, MS. The facility is located at 616 East 19<sup>th</sup> Street, Laurel, Mississippi. The building had been vacant for many years; so, the applicant started renovations to make the facility more suitable to their needs and to bring it up to codes and standards. Repairs included a new sprinkler system, the industrial kitchen, HVAC system, site work, fencing, landscaping, medical equipment and supplies, office equipment and supplies.

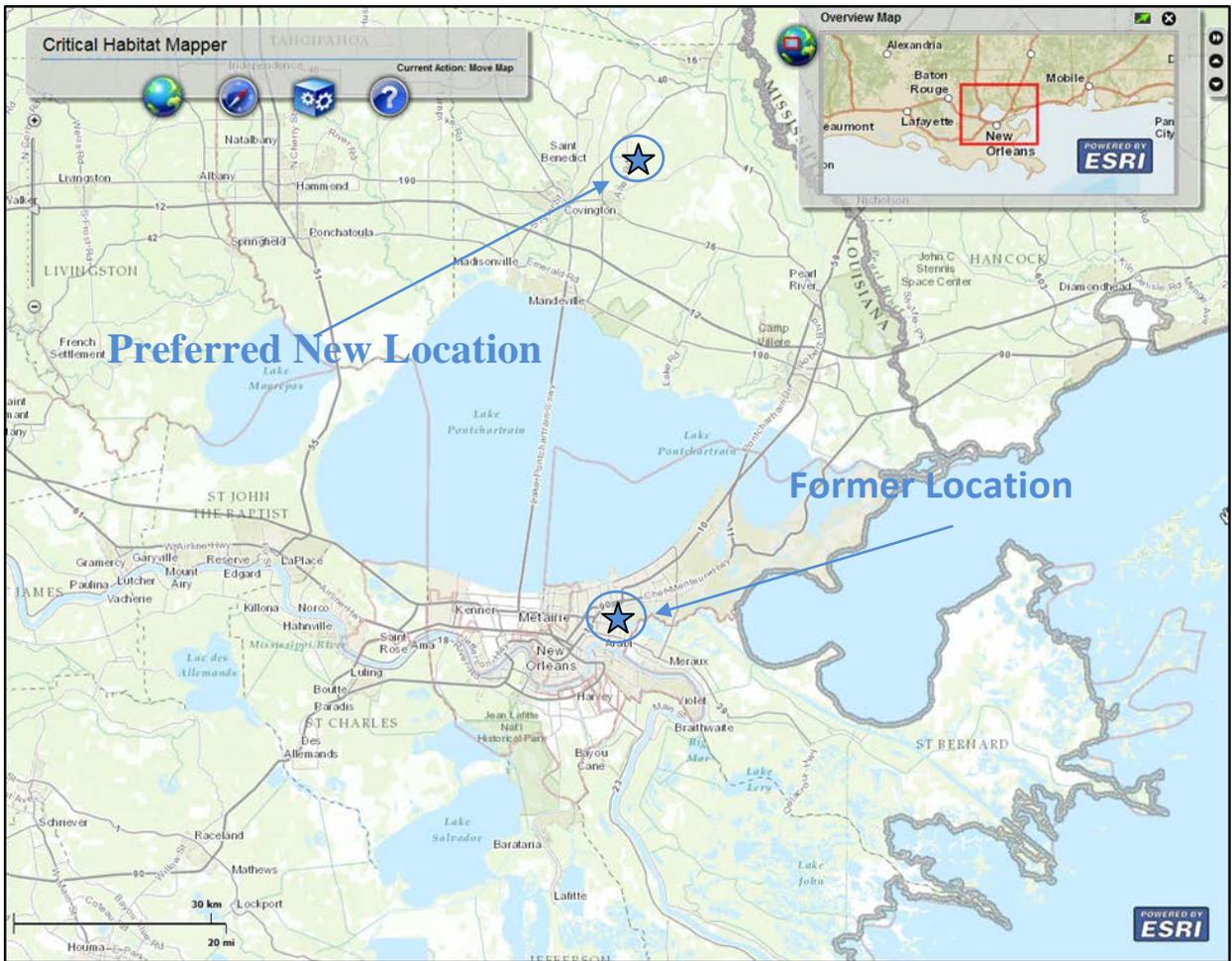
This alternative is to permanently relocate the AMHW to their temporary facility, The Old Davidson Rest Home, in Laurel, Mississippi which will be carried forward and evaluated.

### **3.3 Alternative 3: (Preferred) Relocate the AMHW to St. Tammany Parish**

AMHW seeks FEMA PA federal grant funds to replace eligible facilities lost at the Gentilly Boulevard location with alternate facilities at a site in St. Tammany Parish (i.e., the new AMHW complex) (See Figure 3). The applicant currently owns 50 undeveloped acres off of Highway 21 in Covington, LA (30.54994, -90.018759) where they are proposing to construct the new AMHW complex (See Figure 4). Current conditions of the site include: a tract of approximately 29.298 acres of previously selectively cleared land with heavy mid-story growth (See Figure 5); a tract of approximately 17.139 acres of previously selectively cleared land that has been maintained with a bushhog (See Figure 6); and a tract of approximately 3.84 acres of previously selectively cleared land with heavy mid-story growth (See Appendix A for Photos).

The facility would be designed to house 48 developmentally disadvantaged women. Current site plans (See Appendix B) 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 to 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.

To comply with codes and standards the facility would consist of twelve (12) cottages for resident living quarters, an administration building, community center, and medical building (See Figure 7). Each cottage would be approximately 2,445 square feet (SF) and consists of four (4) bedrooms, two (2) full baths, one (1) half bath, a great room, kitchen, living/counseling room, utility room, and a medicine/laundry room. The community center would include a music/drama room, beauty room, library, director's office, multipurpose room, classrooms, dietitian office, laundry room, kitchen, and several restrooms. Other amenities may include a green house, barn, and pool.



**Figure 3: AMHW – Change of Location Map**



**Figure 4: Preferred Location of AMHW on Hwy 21 Covington, LA**



**Figure 5: Mid-Story Growth of Western 30 Acres**



**Figure 6: Current Conditions of Preferred Site Where Cottages Would Be Constructed**



## 4.0 Affected Environment and Impacts

### 4.1 Impact Summary

The following matrix summarizes the results of the environmental review process (Table 1). Potential environmental impacts that were found to be negligible are not evaluated further. Resource areas that have the potential for impacts of minor, moderate, or major intensity are further developed in the following sections. Definitions of the impact intensity are described below:

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

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

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

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

**Table 1 - Affected Environment and Environmental Consequences Matrix- Alternative 3: (Preferred) Relocate the AMHW to St. Tammany Parish.**

Resource Area	Impact Intensity				Impact Summary	Agency Coordination / Permits	Mitigation
	Negligible	Minor	Moderate	Major			
Geology and Soils		X			<p>Potential for short-term localized increase in soil erosion during construction. Soil use is being changed from prime farmland.</p> <p>The Farmland Protection Policy Act (FPPA: P.L. 97-98, Sec. 1539-1549; 7 U.S.C. 4201, <i>et. seq.</i>) was enacted in 1981 to minimize the unnecessary conversion of farmland to non-agricultural uses as a result of federal actions. The U.S. Department of Agriculture (USDA-Natural Resources Conservation Service (NRCS) Alexandria, LA responded to FEMA-EHP scoping letter on June 12, 2012. Per the letter the project is subject to FPPA. See Section 4.2</p>	<p>NRCS correspondence dated June 12, 2012. (See Appendix C)</p>	<p>Project will permanently convert Prime Farmland to nonagricultural use. Implement construction Best Management Practices (BMPs); install silt fences/straw bales to reduce sedimentation. Area soils would be covered and/or kept wet during construction. If fill is stored on site as part of unit installation or removal, the contractor would be required to appropriately cover it. See also Section 6.0.</p>

Resource Area	Impact Intensity				Impact Summary	Agency Coordination / Permits	Mitigation
	Negligible	Minor	Moderate	Major			
Hydrology and Floodplains (Executive Order 11988)	X				<p>St. Tammy Parish enrolled in the National Flood Insurance Program (NFIP) on April 23, 1971. According to the NFIP Flood Insurance Rate Map panel number 22103C0195F, dated April 30, 2008, the preferred project site is located in zone X, areas outside the special flood hazard areas.</p> <p>Water drains omni directionally to the east, southwest, and the north. The applicant's site plans include a drainage system designed to drain water from the site to the roadside ditch along Highway 21, eventually making way East Fork Little Bogue Falaya. The site plans also propose a retention pond located on the southeast corner of the property.</p> <p>The sewage treatment plant plans propose to discharge 8,000 gallons of treated water per day. This discharge would drain naturally through the south/southwestern end of the property to the Highway 21 roadside ditch eventually making way East Fork Little Bogue Falaya.</p>	<p>DFIRM 22103C0195F, dated April 30, 2008</p> <p>LDEQ Sanitary General Wastewater Discharge Permit Notice of Intent, dated October 25, 2012 and amended January 14, 2013. (See Appendix C)</p> <p>Ordinance Calendar NO. 4295 Ordinance Council Series NO 10-2275AA</p> <p>St. Tammany Ordinance Calendar No: 4446 Ordinance Council Series No: 11-2425 (See Appendix D)</p>	<p>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.</p> <p>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..."</p> <p>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..."</p> <p>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. See Section 6.0</p>

Resource Area	Impact Intensity				Impact Summary	Agency Coordination / Permits	Mitigation
	Negligible	Minor	Moderate	Major			
Wetlands (Executive Order 11990)	X				<p>U.S. Fish and Wildlife Service (USFWS)-mapped wetlands are not present in the preferred project area. However, in a letter dated 7/11/12, the U.S. Army Corps of Engineers (USACE) state that the previous jurisdictional determination (JD), dated 1/30/07, was valid and “part of the property is wetland and subject to Corps’ jurisdiction.” FEMA-EHP submitted solicitation of views (SOV) with current construction plans to USACE and in a response dated 7/2/12; USACE states there are not any “anticipated impacts to any Corps of Engineers projects.” An email SOV for changes to the scope regarding discharge of treated wastewater was sent to USACE, with a response dated 2/19/13 that no permits would be required for the project as designed.</p> <p>Environmental Protection Agency (EPA) also reviewed the project for the discharge of water into the wetlands, in an email response dated 2/13/13, the EPA states they do not have any concerns with the project.</p>	<p>SOV responses dated 7/2/12 and 2/19/13. JD validation response letter dated 7/2/12 and JD from the USACE, dated 1/30/07.</p> <p>EPA Email response dated 2/13/13 (See Appendix C)</p>	<p>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 USACE regulatory requirements. Department of Army (DA) Section 404 permit will be required prior to the deposition or distribution of dredged or fill material into the wetland</p> <p>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).</p> <p>Erosion Control Devices (ECD’s) such as silt fencing, hay bales, sediment traps, etc. should be <b>used and maintained extensively</b> to prevent any potential direct or indirect adverse impacts to nearby wetland areas per the Clean Water Act and EO 11990.</p> <p>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 ROW. Any adverse impacts to adjacent wetlands resulting from the construction of this project will jeopardize receipt of federal funding. Section 6.0.</p>

Resource Area	Impact Intensity				Impact Summary	Agency Coordination / Permits	Mitigation
	Negligible	Minor	Moderate	Major			
Surface Water and Water Quality	X				Project will involve developing seventeen (17) acres of land. Potential for short-term localized increase in sedimentation during construction. Applicant has received a Sanitary General Wastewater Discharge Permit from Louisiana Department of Environmental Quality (LDEQ) for the sewer treatment station.	LDEQ email dated 6/12/12. Phone conversation with Amy Exnicios (LDEQ permit writer) January 2013. Agency Interest number 184806. (See Appendix C)	Implement construction BMPs, install silt fences/straw bales to reduce sedimentation. All precautions should be observed to control nonpoint source pollution from construction activities. LDEQ has stormwater general permits for construction areas equal to or greater than one (1) acre. It is recommended that the applicant contact the LDEQ Water Permits Division at (225) 219-3181 to determine if the proposed project requires a permit. Please be advised that water softeners generate wastewaters that may require special limitations depending on local water quality considerations. Therefore if your water system improvements include water softeners, you are advised to contact the LDEQ Water Permits to determine if special water quality-based limitations will be necessary. Section 6.0.
Groundwater	X				St. Tammany Parish overlies the Southern Hills Regional Aquifer system, which is a Sole Source Aquifer; however, the project is not anticipated to affect the groundwater. The applicant has received a Louisiana Pollutant Discharge Elimination System (LPDES) permit, agency interest number, 184806.	LDEQ email dated 6/12/12. USEPA letter dated 3/16/11. (See Appendix C) LPDES Notice of Intent to Discharge Sanitary Wastewater	The contractor should observe all precautions to protect the groundwater of the region. Applicant must obtain all permits for the water well. See also Section 6.0.
Wild and Scenic River	X				There are no Wild and Scenic Rivers in the vicinity site.	LDWF letter dated 6/7/12. (See Appendix C)	
Coastal Resources	X				According to the Louisiana Department of Natural Resources (LDNR), the project is not located within the Louisiana Coastal Zone. The project is not located within the Coastal Barrier Resource System (CBRS).	LDNR response letter dated 6/8/12 (See Appendix C) DFIRM 22103C0195F (for CBRS)	
Air Quality	X				During construction, there is potential for short-term localized increase in vehicle emissions and dust particles. The St. Tammany Parish air shed is in attainment for all criteria pollutants per the Clean Air Act (CAA).	LDEQ email dated 6/12/12. (See Appendix C)	Vehicle operation times would be kept to a minimum. Area soils would be covered and/or wetted during construction to minimize dust. See also Section 6.0.

Resource Area	Impact Intensity				Impact Summary	Agency Coordination / Permits	Mitigation
	Negligible	Minor	Moderate	Major			
Vegetation and Wildlife	X				The Louisiana Natural Heritage Program has compiled data on rare, endangered, or otherwise significant plant and animal species, plant communities, and other natural features throughout the State of Louisiana. Heritage reports summarize the existing information known at the time of a request regarding a location in question. Personnel of the Habitat Section of the Coastal & Nongame Resources Division have reviewed the preliminary data for the preferred project. After careful review of the database, no impacts to rare, threatened, or endangered species or critical habitats are anticipated for the preferred project. No state or federal parks, wildlife refuges, scenic streams, or wildlife management areas are known at or in the vicinity of the specified site within Louisiana's boundaries	LDWF determination of no effect, dated 6/7/12 USFWS determination of no effect, dated 6/15/12 (See Appendix C)	
Threatened and Endangered Species (Endangered Species Act Section 7)	X				No impact to federally listed threatened or endangered species is anticipated. No impacts to critical habitats are anticipated. No impacts to rare, threatened, or endangered species or critical habitats are anticipated for the preferred project.	USFWS determination of no effect on Federal trust resources, dated 6/15/12 (See Appendix C) LDWF letter dated 6/7/12. (See Appendix C)	
Bald and Golden Eagle Act	X				The bald eagle is protected under the Bald and Golden Eagle Act. Bald eagles are known to occur in St. Tammany Parish.		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 LDWF and USFWS immediately. All correspondence must be documented and remain in the project permanent files. See also Section 6.0.

Resource Area	Impact Intensity				Impact Summary	Agency Coordination / Permits	Mitigation
	Negligible	Minor	Moderate	Major			
Cultural Resources (National Historic Preservation Act Section 106)	X				Based on research using the National Register of Historic Places database, the Louisiana Cultural Resources Map on the Louisiana Division of Historic Preservation's website, and agency files, FEMA has determined that the project area is not located within a National Register Historic District and there are no standing structures within the project area. Based upon the same research, no previously recorded archaeological sites or other historic resources are located within 1.6 km (1.0 mi) of the project area (Figure 3); however no cultural resources surveys have been conducted within 1.6 km (1.0 mi) of the project area. An archaeological survey of the project area was conducted in July 2012 by FEMA archaeologists, entitled <i>Cultural Resources Survey for the Proposed AMHW Near Waldheim, Covington, St Tammany Parish, Louisiana (Negative Findings)</i> . No archaeological material was identified in the survey and FEMA determined that the undertaking would have "No Effect" to Historic Properties. State Historic Preservation Officer (SHPO) concurrence with this determination was received, dated September 26, 2012, and October 30, 2012. Consultation with affected tribes (the Alabama-Coushatta Tribe of Texas, the Choctaw Nation of Oklahoma, the Coushatta Tribe of Louisiana, the Jena Band of Choctaw Indians, the Mississippi Band of Choctaw Indians, the Tunica-Biloxi Tribe of Louisiana) was conducted per FEMA's Programmatic Agreement dated August 17, 2009 and amended on July 22, 2011 (PA) and 36 CFR part 800.2(c)(2)(i)(B). The Choctaw Nation of Oklahoma and the Coushatta Tribe of Louisiana submitted written concurrence with the determination. The remaining Tribes did not object within the regulatory timeframes; therefore, in accordance with Stipulation VIII.E(1) of the PA and 36 CFR part 800.5(c)1, FEMA may proceed with funding the undertaking assuming concurrence.	SHPO concurrence letter September 26, 2012, and October 30, 2012. Alabama-Coushatta Tribe of Texas, the Choctaw Nation of Oklahoma, the Coushatta Tribe of Louisiana, the Jena Band of Choctaw Indians, the Mississippi Band of Choctaw Indians, the Tunica-Biloxi Tribe of Louisiana was conducted per FEMA's Programmatic Agreement dated August 17, 2009 and amended on July 22, 2011 (PA) and 36 CFR part 800.2(c)(2)(i)(B). The Choctaw Nation of Oklahoma and the Coushatta Tribe of Louisiana submitted written concurrence with the determination. The remaining Tribes did not object within the regulatory timeframes. (See Appendix C)	<p>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 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.</p> <p>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 staff. The applicant will not proceed with work until FEMA Historic Preservation completes consultation with the SHPO.</p> <p>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). See also Section 6.0.</p>

Resource Area	Impact Intensity				Impact Summary	Agency Coordination / Permits	Mitigation
	Negligible	Minor	Moderate	Major			
Environmental Justice (Executive Order 12898)/Socioeconomics	X				<p>St. Tammany: According to the 2010 U.S. Census Demographic Profile of St. Tammany, La: the total population is 233,740 with 84.5% White, 12% Black, 4.9% Hispanic, and 1.4% Asian. The median household income is \$60,866 and 9.4% of the population is below poverty level.</p> <p>For New Orleans: According to the 2010 U.S. Census Demographic Profile of New Orleans, La: the total population is 343,829 with 60.2% Black, 33% White, 5.2% Hispanic, and 2.9% Asian. The median household income is \$37,468 and 19% of the population is below poverty level.</p> <p>Relocating the facility would not have an impact on low-income or minority populations. This facility accepts women with mental disabilities and provides full care for all residents; many women stay at the home their entire life. Residents of this facility are accepted from all over the state of Louisiana, not just its surrounding area. The applicant has stated the state will only issue permits for the number of women the home currently houses, (48), should the need arise, Milne has the ability to expand and accommodate more women.</p>	U.S. Census Bureau, American Fact Finder, Data for New Orleans, Louisiana	
Resource Recovery and Conservation Act (RCRA)	X				<p>Project involves construction of a new building and its supporting facilities at the preferred site. All debris must be disposed of in an approved landfill.</p> <p>No Hazardous waste sites, underground storage tanks, superfund sites, etc are located on or around the property.</p>	<p>LDEQ email dated 6/12/12 (See Appendix C)</p> <p>Phase I/Due Diligence Environmental Evaluation, By Balance Consulting, dated 12/10/2006. (See Appendix D)</p>	<p>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</p> <p>See also Section 6.0</p>

Resource Area	Impact Intensity				Impact Summary	Agency Coordination / Permits	Mitigation
	Negligible	Minor	Moderate	Major			
Noise	X				The preferred St. Tammany Site is not located around any noise sensitive receptors. During the construction period there will be a short-term increase in noise levels. St. Tammany Parish noise ordinances state that construction activities shall be exempt from daytime decibel restrictions, but the maximum nighttime sound levels shall apply in all instances.	St. Tammany, Louisiana – Code of Ordinances Article IV Sec. 14 -035.00	The work schedule at the site is to follow St. Tammany Parish Code of Ordinances for noise. See also Section 6.0.
Public Safety and Access	X				All work is occurring on private land.		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 OSHA regulations and the USACE safety manual.  The contractor would post appropriate signage and fencing to minimize potential adverse public safety concerns. See also Sections 6.0.
Traffic and Transportation	X				The work would take place behind the property fence. The only anticipated traffic impacts would be due to construction materials and equipment accessing the site. Traffic volumes along the respective work access areas would increase temporarily during work activities. Traffic would be temporarily impacted during construction of the entrance way.  This highway is used as a corridor between Abita Springs and Covington; long term traffic would include slight increase of vehicles in the area accessing the site such as workers, family members, delivery trucks, etc. This impact is expected to be nominal.		Appropriate signage and barriers should be in place prior to construction activities in order to alert pedestrians and motorists of project activities and traffic pattern changes. The contractor would implement traffic control measures, as necessary. See also Section 6.0.

Resource Area	Impact Intensity				Impact Summary	Agency Coordination / Permits	Mitigation
	Negligible	Minor	Moderate	Major			
Hazardous Materials and Toxic Wastes	X				<p>A review of data sources (e.g., USEPA EnviroMapper, NEPAAssist, and the Louisiana Electronic Document Management System™) revealed that the preferred project site is not on federal and/or state agency's lists concerning Voluntary Remediation Program, Brownfield Program, underground storage tank decommission, waste/debris disposal facilities, and oil/gas wells sites. According to historical aerial photographs from 1989 to 2010 and the topographic maps dated December 1939 and March 9, 2012, there were no obvious structures on the preferred site and no obvious sites of concern detected in the vicinity of preferred project area.</p> <p>The Northeast Research Station has no record or indication of past or present hazardous waste activities including notification as a hazardous waste generator or other regulated activity. The Environmental Protection Agency reviewed the site and preferred Alternative and performed a database search for records associated with the site and provided comment on the preferred Alternative. No adverse records were identified and comments were incorporated into the EA analysis and documentation.</p>	USEPA EnviroMapper, NEPAAssist, and the Louisiana Electronic Document Management System™	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 would be required to take appropriate measures to prevent, minimize, and control the spill of hazardous materials in the construction area. See also Section 6.0.

## 4.2 Geology and Soil

The Farmland Protection Policy Act (FPPA: P.L. 97-98, Sec. 1539-1549; 7 U.S.C. 4201, *et. seq.*) was enacted in 1981 to minimize the unnecessary conversion of farmland to non-agricultural uses as a result of federal actions. Programs administered by federal agencies must be compatible with state and local farmland protection policies and programs. The Natural Resources Conservation Service (NRCS) is responsible for protecting significant agricultural lands from irreversible conversions that result in the loss of an essential food or environmental resource. Prime farmland is characterized as land with the best physical and chemical characteristics for the production of food, feed, forage, fiber, and oilseed crops. For the purpose of FPPA, farmland includes prime farmland, unique farmland, and land of statewide or local importance. Farmland subject to FPPA requirements does not have to be currently used for cropland. It can be forest land, pastureland, cropland, or other land, but not water or urban built-up land.

The NRCS Soil Survey of St. Tammany Parish indicates the Savannah-Ruston general soil map unit present in the vicinity of the site of the preferred alternative. This soil type consists of very gently sloping, moderately well to well drained soils that are loamy throughout. The soils of this map unit are on very gently to gently sloping ridgetops and side slopes on the terrace uplands. They are at the highest elevations in the parish. Slopes range from 1 to 6 percent. This map unit makes up about 15% of the land in the parish. It is about 91% Savannah soils, 7% Ruston soils, and 2% soils of minor extent. The Savannah soils are moderately well drained. They have a dark grayish brown fine sandy loam surface layer. The subsoil is yellowish brown, mottled clay loam in the upper part, and in the lower part is a fragipan of mottled brownish and reddish clay loam.

The Savannah Series (Fine-Loamy, Siliceous, semiactive, thermic Typic Fragiudults) comprises 99% of the 50 acre parcel. Savannah is listed on the St. Tammany Parish Soil Survey as Prime and Unique Farmland because of the following properties:

1. Moderately well drained
2. Fine-loamy Surface
3. Moderately slowly permeable
4. 1-3 % slope (A)

For the first 25 inches plus (62.5 cm), this soil series allows water, roots, and nutrients to infiltrate (enter from the surface down) and percolate (down through the soil profile) without much resistance. These properties indicate that the water entering and already in the profile are not met with harsh restrictions, such as hardpan and plow plan, rock, or shrink-swell clays, which would cause water, air, roots, and nutrients to be restricted within the first 20 inches (50 cm). The Fine-loamy surface texture property may cause some erosional problems if measurable BMPs are not in place. This soil has a Fragipan horizon/layer (compaction and brittle semi impassable layer), which may restrict the percolation (movement of water, nutrients, and roots down through the profile), but doesn't have immediate problems for land use plans pertaining to farmland use. The slope classification established for St. Tammany Parish soil survey has the slope A, 1-

3%- meaning the soil is located on a nearly level landscape and is accessible for land use plans as it relates to agricultural use.

The Clean Water Act and associated federal regulations (Title 40 of the Code of Federal Regulations 123.25 (a)(9), 122.26(a), 122.26(b)(14)(x), and 122.26(b)(15)) require nearly all construction site operators engaged in clearing, grading, and excavating activities that disturb one acre or more, including smaller sites in a larger common plan of development or sale, to obtain coverage under a National Pollutant Discharge Elimination System (NPDES) permit for their stormwater discharges (EPA, 2007). Louisiana has been authorized by the EPA to implement the federal requirements and have issued their own permits for stormwater discharges associated with construction activities (LDEQ, Louisiana Department of Environmental Quality, 2012). It is anticipated that the preferred project including the construction of the new AMHW complex will require a permit from the LDEQ. The provision of the federal grant to complete this proposed project will be conditioned to obtain necessary permits and remain in compliance with the permit requirements.

Alternative 1- No Action Alternative: The No Action alternative would not change site drainage or have an effect on geology and soils of the area.

Alternative 2: Relocate the AMHW to Laurel, Mississippi: This alternative would be on a previously disturbed site. Soils at this site are Savannah-Urban land complex and are not considered prime farmland. Therefore, this alternative would not affect prime farmlands.

Alternative 3: Relocate the AMHW to St. Tammany Parish: The preferred project is located within the Southeastern Plains ecoregion of Louisiana, which is composed of mostly tree-covered, irregular plains with a mosaic of cropland, pasture, woodland, and forest land cover. Natural vegetation is predominantly upland longleaf pine woodlands, with smaller areas of oak-pine and mixed hardwood forest. Streams are low to moderate gradient with mostly sandy substrates. Commercial pine plantations are extensive. Timber production, dairy, and beef cattle farming are major land uses, with urban and residential development increasing. Winters are mild and summers are hot, with temperatures and precipitation increasing from north to south.

The location consists of Cahaba fine sandy loam, 1 to 3 percent slopes (Ca) and Savannah fine sandy loam (Sa), 1 to 3 percent slopes, both are considered prime farmland. Per correspondence with NRCS dated June 12, 2012, the project will irreversibly convert farmland to nonagricultural uses.

Form AD-1006, Farmland Conversion Impact Rating was completed (see Appendix D). NRCS gave the relative Value of Farmland to be converted a 100 (on a scale of 0 to 100 points). This land Evaluation Criterion (part V) was based on the Total Acres to be Converted, both directly and indirectly (50); total acres Prime and Unique Farmland (48); Percentage of Farmland in County or Local Government Unit to be Converted (0.01); and Percentage of Farmland in Government Jurisdiction with same or Higher Relative Value (13.5).

FEMA- EHP completed the Site Assessment Criteria (Part VI) by utilizing criteria explained in 7 CFR 658.5b and assistance from an NRCS representative. FEMA's overall rating of 57 is based on the following categories: Area in Non - urban Use (11 out of 15); Perimeter in Non - urban Use (9 out of 10); Percent of Site Being Farmed (0 out of 20); Protection Provided by State and Local Govt. (0 out of 20); Distance from Urban Build - up Area (15 out of 15); Distance to Urban Support Services (10 out of 15); Size of Present Farmland Unit Compared to Average (0 out of 10); Creation of Non - farmable Farmland (5 out of 10); Availability of Farm Support Services (5 out of 5); On - Farm Investments (0 out of 20); Effects of Conversion on Farm Support Services (0 out of 10); and Compatibility with Existing Agricultural Use (2 out of 10). These ratings are based on the assessment that farming has not been conducted on the property of interest in at least the past thirty (30) years. However, if the property was used for agriculture use the Savannah (Sa) soil series would produce maximum yield.

NRCS's rating combined with FEMA's rating results in a total score of 157 out of 260. Per 7 CFR 658.4(c)(2) "sites receiving a total score of less than 160 need not be given further consideration for protection and no additional sites need to be evaluated."

The property is currently zoned as MD- 1(Medical Residential District). It was rezoned from A- 1A (Suburban District) in 2011. According to the staff comments in the Rezoning Petition, "the requested zoning change does not meet the 2025 future land use plan. However, the large size of the site will allow for the preservation of the natural environment, the creation of open space, and the conservation of the rural character of the surrounding area. Also, in addition to the buffer planting area requirements, the MD- 1 zoning district requires additional setback based on the height of the building and the abutting residential zoning district." (See Appendix D)

Project activities will be required by the LDEQ to observe precautions to control nonpoint source pollution from construction activities and further will be required to develop the required Clean Water Act Stormwater Pollution Prevention Plan and implement the required conditions.

## **5.0 CUMULATIVE IMPACTS**

The impact of Hurricane Katrina in St. Tammany Parish resulted in either wind or flood damage to many structures. St. Tammany Parish has received Federal funding for various projects ranging from infrastructure to drainage improvements throughout the parish, with most of the projects occurring at the southern end of the parish near and around Lake Pontchartrain. In addition to Federal assistance, the parish has developed zoning maps and plans to further develop parts of the parish, encouraging business and economic growth.

The preferred alternate is located in a rural area of St. Tammany Parish, Waldheim, LA. The current and future land use maps from the St. Tammany Parish Planning and

Development Department shows the area as rural, residential, and agriculture. There are no major infrastructure projects that have recently taken place or are planned to take place in the area. The preferred alternative is to construct a home for mentally disabled women, which conforms to the current land use for the area. Covington, LA, seven (7) miles away, is the nearest city with developed services such as fire, police, city utilities, etc.

Cumulative impacts are those effects on the environment that result from the incremental effect of the action when added to past, present and reasonably foreseeable future actions, regardless of what agency (federal or nonfederal) or person undertakes such other actions. Cumulative effects can result from individually minor but collectively significant actions taking place over a period of time. This project when combined with others in St. Tammany Parish will not result in cumulative impacts.

## 6.0 CONDITIONS AND MITIGATION MEASURES

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

- 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 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 ROW.
- 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.
- Implement construction BMPs, install silt fences/straw bales to reduce sedimentation. All precautions should be observed to control nonpoint source pollution from construction activities. LDEQ has stormwater general permits for construction areas equal to or greater than one (1) acre. It is recommended that the applicant contact the LDEQ Water Permits Division at (225) 219-3181 to determine if the proposed project requires a permit.
- 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.
- Water softeners generate wastewaters that may require special limitations depending on local water quality considerations. Therefore, if your water system improvements include water softeners, you are 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 USACE regulatory requirements. DA 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.
- 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 LDWF and USFWS immediately. All correspondence must be documented and remain in the project permanent files.
- 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.
- 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 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 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 staff. The applicant will not proceed with work until FEMA HP completes consultation with the 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 will jeopardize receipt of FEMA funding.

## **7.0 PUBLIC INVOLVEMENT**

The public will be invited to comment on the EA. A legal notice was published in the Advocate- New Orleans edition April 3-5, 2012. Additionally the Environmental Assessment was made available at the St. Tammany Parish Library - Covington Branch and at Orleans Parish Library – Mid-City Branch. The Environmental Assessment was published on FEMA’s websites. A copy of the Public Notice is attached in Appendix D.

## **8.0 AGENCY COORDINATION**

U.S. Environmental Protection Agency  
U.S. Fish and Wildlife Service  
U.S. Army Corps of Engineers  
Louisiana Department of Wildlife and Fisheries  
Louisiana Department of Natural Resources  
Louisiana Department of Environmental Quality  
USDA Natural Resources Conservation Service  
Louisiana State Historic Preservation Office  
Tribal Historic Preservation Office and/or cultural offices

## **9.0 LIST OF PREPARERS**

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**Appendix A  
(Site Photos)**

**Appendix B**  
**(Site Plans for Preferred Alternative)**

**Appendix C**  
**(Agency Coordination)**

**Appendix D**  
**(Other Information: Public Notice, FPPA, Wetland JD, etc.)**