

DRAFT Environmental Assessment

Press Park Residential Development &
Community Center

Housing Authority of New Orleans

FEMA-1603-DR-LA

New Orleans, Louisiana, Orleans Parish

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



FEMA

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LIST OF ACRONYMS

ABFE	Advisory Base Flood Elevation
ACM	Asbestos-Containing Materials
APE	Area of Potential Effects
BFE	Base Flood Elevation
CBRA	Coastal Barrier Resources Act
CBRS	Coastal Barrier Resources System
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CWA	Clean Water Act
CZMA	Coastal Zone Management Act
DFIRM	Digital Flood Insurance Rate Map
EA	Environmental Assessment
EIS	Environmental Impact Statement
EO	Executive Order
ESA	Endangered Species Act
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FONSI	Finding of No Significant Impact
HANO	Housing Authority of New Orleans
HEAG	Highest Existing Adjacent Grade
HSDRRS	Hurricane Storm Damage Risk Reduction System
HUD	Housing and Urban Development
IC	Institutional Control
LA GOHSEP	Louisiana Governor's Office of Homeland Security and Emergency Preparedness
LBP	Lead-Based Paint
LCRP	Louisiana Coastal Resources Program
LDEQ	Louisiana Department of Environmental Quality
LDNR	Louisiana Department of Natural Resources
LDPES	Louisiana Pollutant Discharge Elimination System
LESHAP	Louisiana Emission Standards for Hazardous Air Pollutants
NEPA	National Environmental Policy Act
NESHAP	National Emission Standards for Hazardous Air Pollutants
NHPA	National Historic Preservation Act
NPDES	Non-Point Discharge Elimination System
NPL	National Priorities List
NRHP	National Register of Historic Places
NWI	National Wetlands Inventory
O&M	Operations and Maintenance
OU	Operable Unit
PA	Public Assistance
PAH	Polycyclic Aromatic Hydrocarbons
cPAH	Carcinogenic Polynuclear Aromatic Hydrocarbons
REC	Recognized Environmental Conditions
RECAP	Risk Evaluation/Corrective Action Program
RCRA	Resource Conservation and Recovery Act

RFP	Request for Proposals
RHA	Rivers and Harbors Act
ROD	Record of Decision
SHPO	State Historic Preservation Office/Officer
TAL	Target Analytical List
USACE	United States Army Corps of Engineers
USEPA	U.S. Environmental Protection Agency
USFWS	United States Fish and Wildlife Service

1.0 INTRODUCTION

1.1 Project Authority

Hurricane Katrina made landfall on August 29, 2005 near the town of Buras, Louisiana with sustained winds of more than 125 miles per hour. President George W. Bush declared a major disaster for the State of Louisiana (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. This is pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), Public Law 93-288, as amended. Section 406 of the Stafford Act authorizes FEMA's Public Assistance Program (PA) to assist in funding the repair, restoration, reconstruction or replacement of public facilities damaged as a result of the declared disaster.

This Environmental Assessment (EA) has been 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 Part 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 (EIS) or a Finding of No Significant Impact (FONSI).

1.2 Background

The storm surge from Hurricane Katrina damaged levees and entered the City of New Orleans from various coastal waterways, resulting in flooding throughout much of the area. Subsequently, the winds and floodwaters caused substantial damage to the Housing Authority of New Orleans' (HANO's) portfolio of affordable housing and associated structures, including Press Park Residential Development and Community Center (Press Park). Press Park was constructed in the 1970s and consists of seven (7) apartment buildings containing fifty-six (56) multi-bedroom apartment units; eighteen (18) townhome buildings containing ninety-eight (98) HANO-owned units and sixty-seven (67) non-HANO owned units; and one (1) community center.

Press Park, situated on approximately 13.5 acres within the eastern section of New Orleans, Orleans Parish, Louisiana, is located approximately three miles south of Lake Pontchartrain and three miles north-northeast of the City of New Orleans' Central Business District (CBD) (Figure 1). This tract of land is located on the 'East Bank' of the Mississippi River and includes the properties identified in Table 1. All properties are located within zip code 70126. The approximate geographic coordinates at the center of the Press Park site are Latitude 29.990833, Longitude -90.039722.

Press Park, for purposes of this EA, shall be divided into north and south sections to be defined as follows:

The north section of Press Park is bounded to the north by Higgins Boulevard, to the east by Montegut Street, to the south by Benefit Street and to the west by a fence line that runs from Higgins Boulevard to Benefit Street. Press Court, which runs from Higgins Boulevard at the northern end and south to Benefit Street, bisects the north section (Figure 2).

The south section of Press Park is bounded to the north by Benefit Street, to the south by Abundance Street, to the west by Press Court and to the east by a fence line that runs from the south near the intersection of Abundance Street and Feliciana Street to the northwest where it intersects with Benefit Street (Figure 2).

Press Park was developed on the eastern perimeter of the former Agriculture Street Landfill, which operated from approximately 1909 to 1958. During operation, the landfill received municipal wastes as well as ash from municipal incinerators. Additionally, open burning was utilized frequently as a method for waste reduction at the site. In 1965, the landfill was briefly reopened to support debris disposal needs resulting from the effects of Hurricane Betsy. During the 1970s and 1980s, the area was developed with residential dwellings as well as an elementary school and community center. In 1994, the site was placed on the National Priorities List (NPL) by the U.S. Environmental Protection Agency (USEPA) after investigations recorded contaminants of potential concern (COPCs) consisting of lead, arsenic, and carcinogenic polycyclic aromatic hydrocarbons (cPAHs) in the soils. Subsequently, two (2) separate response phases were conducted: Phase I from October 15, 1998 to February 2, 2000 and Phase II from August 2000 to April 2001 (Leaaf, 2011). However, the soils directly beneath the residential units as well as some of the sidewalks and driveways were not remediated. Refer to Section 4.6 for further discussion.

HANO has submitted an application for funding under FEMA's Public Assistance Program being administered in response to FEMA-1603-DR-LA. HANO proposes to demolish HANO-owned buildings, including the community center, to the slab. Non-HANO owned townhome units will not be demolished; instead, the units will be left standing and structurally braced.

Table 1 – Proposed Press Park Residential Development Affected Addresses

Street Name	Street Address
Press Street	3003, 3005, 3007, 3101,3103, 3105, 3111, 3115, 3117, 3121, 3123, 3127, 3203, 3209, 3211, 3215, 3219, 3225, 3301, 3302, 3303, 3304, 3305, 3307, 3309, 3310, 3311, 3313, 3314, 3315, 3317, 3319, 3321, 3323, 3325, 3327, 3329, 3331, 3333, 3335, 3337, 3339, 3341, 3343, 3345, 3347, 3401, 3403, 3405, 3407, 3409, 3411, 3413, 3415
Press Court	2900, 2902, 2903, 2906, 2907, 2909, 2911, 2912, 2914, 3000, 3001, 3002, 3003, 3004, 3006, 3007, 3011, 3012, 3013, 3014, 3015, 3016, 3017, 3019, 3021, 3022, 3023, 3208, 3210, 3216, 3220
Higgins Boulevard	2901, 2903, 2905, 2907, 2909, 2911, 2913, 2915 - 2931
Higgins Court	2906, 2908, 2914, 2916
Montegut Street	3212, 3216, 3218, 3224, 3228, 3230, 3236
Abundance Court	3001, 3003, 3005, 3007, 3009, 3011, 3013, 3017, 3021, 3023, 3025, 3105, 3107, 3109, 3111, 3115
Abundance Street	2901, 2903, 2905, 2907, 2911, 2913, 3009
Benefit Street	2905, 2911, 2915, 2917, 2921, 3009, 3013, 3015
Intersection of Press & Benefit Streets	Community Center - No physical address

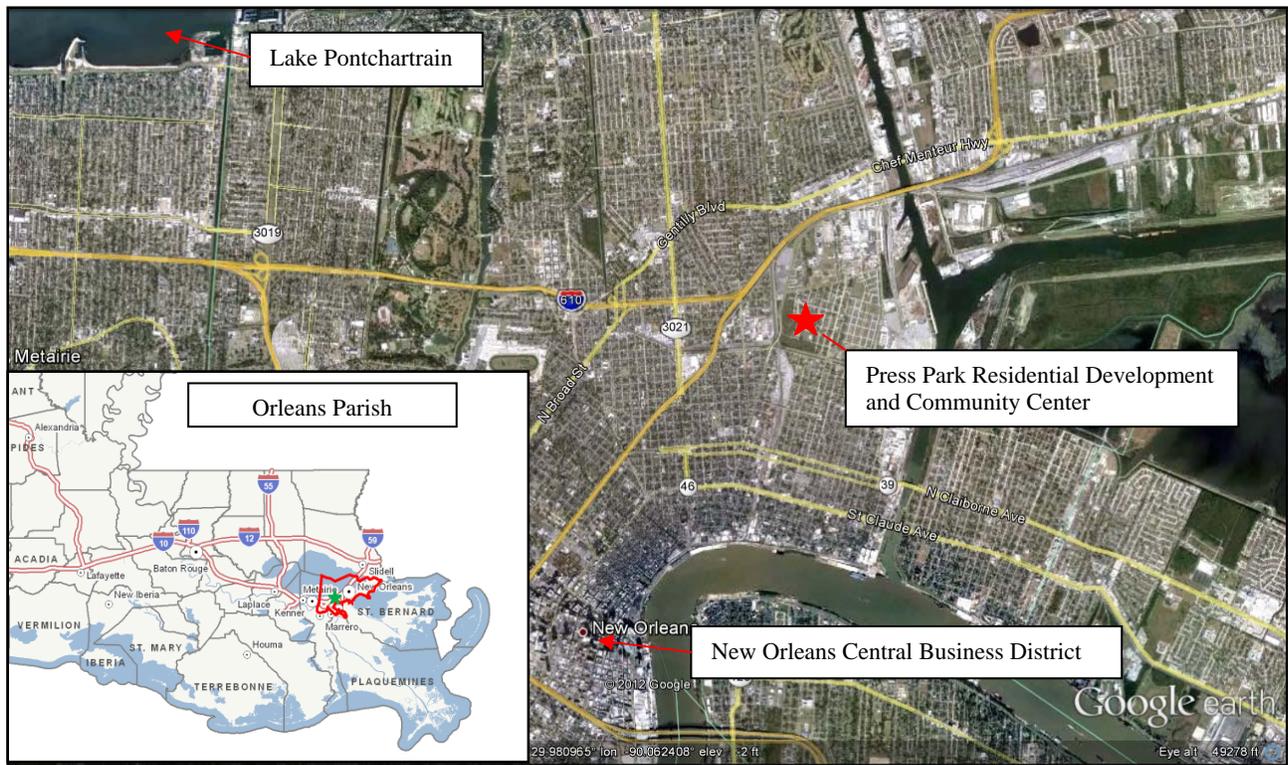


Figure 1 - Proposed Project Vicinity (Google Earth, 2012)



Figure 2 - Press Park Residential Development and Community Center (Google Earth, 2010)

2.0 PURPOSE AND NEED

The Legislature of the State of Louisiana has determined the availability of decent, safe, affordable housing for low to moderate income citizens is a fundamental state value that creates economic and ethnic diversity and is an essential public function. Therefore, it is the mission of HANO to provide and encourage the development of quality, affordable housing and the preservation of healthy, vibrant neighborhoods for the citizens of New Orleans in a manner that promotes self-sufficiency and economic opportunity.

The objective of FEMA's Public Assistance Program is to provide assistance to state, tribal, and local governments, as well as certain types of private non-profit (PNP) organizations so that communities can quickly respond to and recover from major disasters or emergencies declared by the President. As a result of Hurricane Katrina, several HANO properties, including Press Park, were heavily damaged.

Press Park structures were rendered uninhabitable post Hurricane Katrina. Furthermore, the outmoded and damaged structures no longer met HANO's objectives for providing a safe community with modern housing to low-income residents of New Orleans. The demolition of Press Park is needed to eliminate a storm-damaged, blighted property with a long history of environmental safety hazards for its residents.

3.0 ALTERNATIVES

The NEPA process consists of an evaluation of the environmental effects of a federal undertaking, including its alternatives. Three alternatives have been proposed and reviewed:

1) No Action, 2) Demolition with remediation, and 3) Demolition to concrete slab with no remediation (proposed action).

Alternative 1 – No Action

Under the No Action alternative, Press Park will be left in its current condition, which consists of damaged and dilapidated buildings that pose a threat to public health and safety. The site would remain in its current blighted state, creating unsafe conditions for the surrounding residents.

Alternative 2 – Demolition with Remediation

Under this alternative, the HANO-owned units would be demolished, where possible the slabs and other concrete/asphalt areas removed, the utilities removed or capped and the soils remediated in accordance with the previously developed Agriculture Street Landfill Superfund cleanup scope of work for Operable Units (OU) 2 and 3 (discussed further in Section 4.6). Approximately 24 inches of soil would be excavated followed by the placement of a geo-textile permeable mat topped with orange netting to serve as a marker to delineate clean fill from the contaminated soil located below the permeable mat. Clean fill would be placed on top of the orange netting that would then be topped off with sod to prevent erosion. Utilities would either be removed per the USEPA Technical Abstract for Utilities (Appendix A) or capped in place. The entire area would remain fenced and grass maintained as required by a Consent Decree between the City of New Orleans and the USEPA (Appendix A). Non-HANO owned townhome units would not be demolished; instead, the units would be left standing and structurally braced. Furthermore, HANO would be responsible for the operation and maintenance (O&M) of the property, such ensuring the braces remain secure and stable, the vegetation is preserved, and the fence around the property is maintained and locked.

Alternative 3 – Demolition to Concrete Slab with No Remediation (Proposed Action)

This alternative would consist of demolishing the HANO-owned buildings, including the community center, to the concrete slab. All utilities would be capped in place. Non-HANO owned townhome units would not be demolished; instead, the units would be left standing and structurally braced. Furthermore, HANO would be responsible for the O&M of the property, such as ensuring the braces remain secure and stable, the vegetation is preserved, and the fence around the property is maintained and locked. There would be no removal of concrete slabs or other concrete/asphalt areas and subsequently, no soil disturbance. Therefore, no remediation activities would be conducted.

4.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL IMPACTS

4.1 Wetlands and Other Waters of the United States

4.1.1 Regulatory

The United States Army Corps of Engineers (USACE) regulates the discharge of dredged or fill material into waters of the U.S., including wetlands, pursuant to §§ 401 and 404 of the Clean Water Act (CWA). Section 402 of the CWA, entitled, National Pollutant Discharge Elimination System (NPDES), authorizes and sets forth standards for state administered permitting programs regulating the discharge of pollutants into navigable waters within the state's jurisdiction. Wetlands are identified as those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. The USACE also regulates the building of structures in waters of the U.S. pursuant to §§ 9 and 10 of the Rivers and Harbors Act (RHA).

Executive Order (EO) 11990, Protection of Wetlands, directs Federal agencies to minimize the destruction, loss, or degradation of wetlands and to preserve and enhance the values of wetlands for federally funded projects. FEMA regulations for complying with EO 11990 are found at 44 CFR, Part 9, Floodplain Management and Protection of Wetlands.

4.1.2 Existing Conditions

The proposed project site is located in an urban, previously-disturbed site with no evidence of wetlands or other waters of the U.S. According to the U.S. Fish & Wildlife Service (USFWS) National Wetlands Inventory (NWI) map, there are no wetlands that occur within or near the proposed project area (Figure 3) (USFWS, 2012).

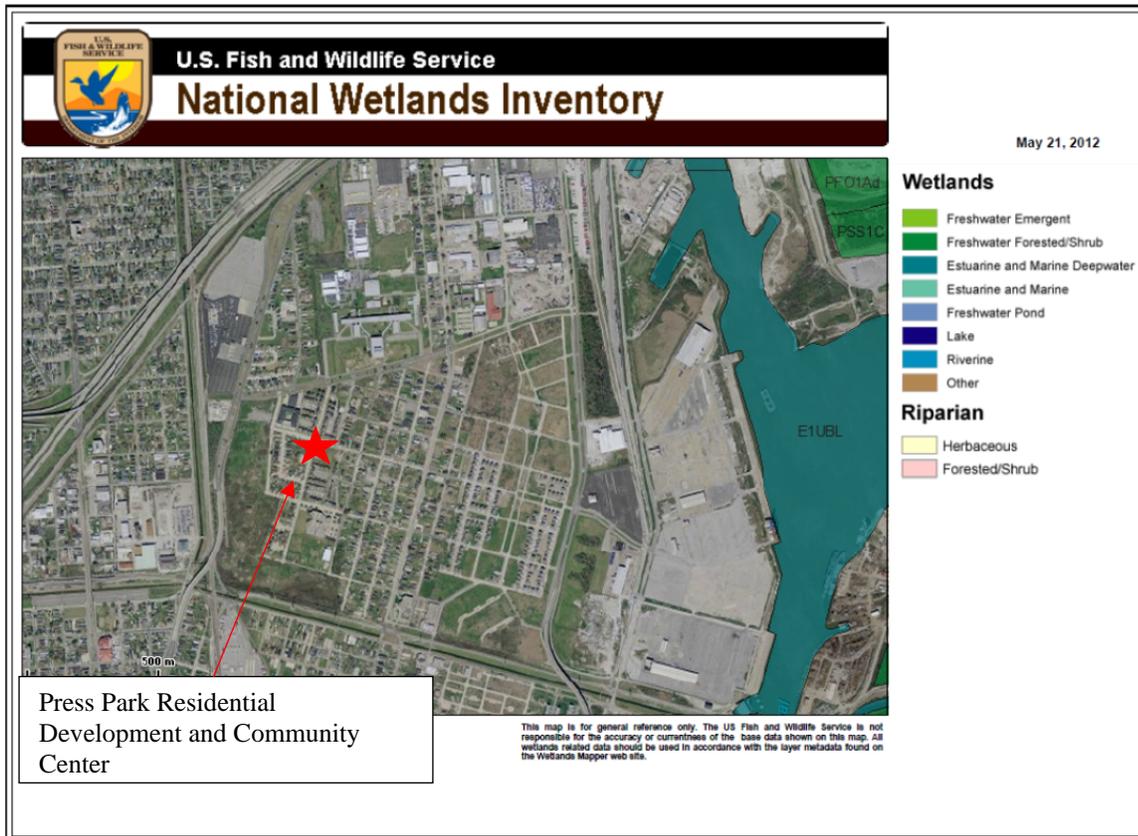


Figure 3 – National Wetlands Inventory Map (USFWS, 2012)

4.1.3 Environmental Consequences

Alternative 1 – No Action

The No Action alternative would have no impact on wetlands or other waters of the U.S. and would not require permits under Section 404 of the CWA or Section 10 of the RHA.

Alternative 2 – Demolition with Remediation

Demolition and remediation would have no impact on wetlands or other waters of the U.S. FEMA has determined the proposed location is an urban, previously-disturbed site and is not a jurisdictional wetland under EO 11990. Additionally, it would not require permits under Section 404 of the CWA or Section 10 of the RHA. Furthermore, in a letter dated March 22, 2013, the USACE determined the property is not in a wetland subject to USACE jurisdiction and a permit under Section 404 of the CWA would not be required for the deposition or redistribution of dredged or fill material on this site.

Alternative 3 – Demolition to Concrete Slab with No Remediation (Proposed Action)

Under the Proposed Action, the demolition activities would not impact wetlands or other waters of the U.S. FEMA has determined the proposed location is an urban, previously-disturbed site and is not a wetland under EO 11990. Additionally, it would not require permits under Section 404 of the CWA or Section 10 of the RHA. Furthermore, in a letter dated March 22, 2013, the USACE determined the property is not in a wetland subject to USACE jurisdiction and a permit under Section 404 of the CWA would not be required for the deposition or redistribution of dredged or fill material on this site.

Although FEMA has determined the proposed location is an urban, previously disturbed site, and is not a wetland under EO 11990, the contractor should implement best management practices that meet Louisiana Department of Environmental Quality (LDEQ) permitting specifications for storm water discharge regulated under §§ 401 and 402 of the CWA to minimize impacts to any waters of the U.S. This includes designing the site with specific construction measures to reduce or eliminate storm water run-off impacts. Additionally, hazardous materials associated with construction equipment should be handled according to local, state, and federal regulations in order to minimize the risk of spills and leaks and subsequent impacts to surface and groundwater resources.

4.2 Floodplains

4.2.1 Regulatory

EO 11988 (Floodplain Management) requires federal agencies to avoid direct or indirect support or development within the 100-year floodplain whenever there is a practicable alternative. FEMA's regulations for complying with EO 11988 are found at 44 CFR Part 9, Floodplain Management and Protection of Wetlands.

4.2.2 Existing Conditions

In July 2005, FEMA initiated a series of flood insurance studies for many of the Louisiana coastal parishes as part of the Flood Map Modernization effort through FEMA's National Flood Insurance Fund. These studies were necessary because the flood hazard and risk information shown on many Flood Insurance Rate Maps (FIRMs) were developed during the 1970s, and the physical terrain had changed significantly, such as major loss of wetland areas. After Hurricanes Katrina and Rita, FEMA expanded the scope of work to include all of coastal Louisiana. The magnitude of the impacts of Hurricanes Katrina and Rita reinforced the urgency to obtain additional flood recovery data for the coastal zones of Louisiana. More detailed analysis was possible because new data was obtained after the hurricanes, including information on levees and levee systems, new high-water marks, and new hurricane parameters (RiskMAP6, 2007).

During an initial post-hurricane analysis, FEMA determined that the "100-Year" or 1-percent chance storm flood elevations on FIRMs for many Louisiana communities, referred to as Base Flood Elevations (BFEs), were too low. FEMA created recovery maps showing the extent and magnitude of Hurricanes Katrina and Rita surges, as well as information on other storms over the past 25 years (Lamp, 2007). The 2006 advisory flood data shown on the recovery maps for the Louisiana-declared disaster areas show high-water marks surveyed after the storm, flood limits developed from these surveyed points, and Advisory Base Flood Elevations (ABFEs). The recovery maps and other advisory data were developed to assist parish officials, homeowners, business owners, and other affected citizens with their recovery and rebuilding efforts (RiskMAP6, 2007).

Updated preliminary flood hazard maps from an intensive five-year mapping project guided by FEMA were provided to all Louisiana coastal parishes in early 2008. The new maps released, known as Preliminary Digital Flood Insurance Rate Maps (DFIRMs), provided communities with a more scientific approach to economic development, hazard mitigation planning, emergency response, and post-flood recovery.

The USACE has completed work on the Hurricane and Storm Damage Risk Reduction System (HSDRRS) for the Greater New Orleans area (FEMA, 2011). This 350-mile system of levees, floodwalls, surge barriers, and pump stations will reduce the flood risk associated with a storm event. In September of 2011, the USACE provided FEMA with assurances that the HSDRRS is capable of defending against a storm surge with a 1-percent annual chance event of occurring in any given year. The areas protected include portions of St. Bernard, St. Charles, Jefferson, Orleans, and Plaquemines parishes (FEMA, 2011). Revised Preliminary DFIRMs were issued November 9, 2012 for areas benefiting from the protection of the HSDRRS. Press Park is located within this protective system. Where issued, the Revised Preliminary DFIRMs replace 2008 Preliminary DFIRMs and now represent the best available flood risk data for compliance with EO 11988 and 44 CFR 9 (FEMA, 2011).

In compliance with FEMA policy implementing EO 11988, Floodplain Management, the proposed project was reviewed for possible impacts associated with occupancy or modification to a floodplain. Orleans Parish enrolled in the NFIP on August 3, 1970. Per Revised Preliminary DFIRM Panel Number 22071C0231F, dated 11/9/2012, the site is located within shaded Zone X: areas of 0.2% annual chance flood; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from the 1% annual chance flood, and within Zone "AE", elevation -3, base flood elevation determined.

4.2.3 Environmental Consequences

Alternative 1 – No Action

Under the No Action alternative, Press Park would be left in its current condition, which consists of damaged and dilapidated buildings that pose a threat to public health and safety. The site would remain in its current blighted state, creating unsafe conditions for the surrounding residents. However, there would be no impact to the floodplain under this alternative.

Alternative 2 – Demolition with Remediation

Per Revised Preliminary DFIRM Panel Number 22071C0231F, dated 11/9/2012, the site is located within shaded Zone X: areas of 0.2% annual chance flood; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from the 1% annual chance flood, and within Zone "AE", elevation -3, base flood elevation determined. Under this alternative, the HANO-owned units, including the community center, would be demolished, where possible the slabs and other concrete/asphalt areas removed, and the soils remediated in accordance with the previously developed Agriculture Street Landfill Superfund cleanup scope of work for OU2 & OU3 (discussed further in Section 4.6). Although this alternative would enhance beneficial floodplain values because it would no longer support existing development and structures that may be subject to repetitive flooding and loss, it could potentially lead to new development in the floodplain at risk of flood loss, due to the existence of the non-HANO owned townhome units.

Alternative 3 – Demolition to Concrete Slab with No Remediation (Proposed Action)

Per Revised Preliminary DFIRM Panel Number 22071C0231F, dated 11/9/2012, the site is located within shaded Zone X: areas of 0.2% annual chance flood; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from the 1% annual chance flood, and within Zone "AE", elevation -3, base flood elevation determined. Under this alternative, HANO-owned buildings, including the

community center, would be demolished to the concrete slab. Non-HANO owned townhome units would not be demolished; instead, the units would be left standing and structurally braced. Furthermore, there would be no removal of concrete slabs or other concrete/asphalt areas and subsequently, no soil disturbance. No remediation activities would be conducted, and no new homes would be built on the site, thus limiting future exposure to the site's contaminants.



Figure 4 – Revised Preliminary Digital Flood Insurance Rate Map Panel 22071C0231F

4.3 Coastal Resources

4.3.1 Regulatory

The Coastal Zone Management Act of 1972 (CZMA) requires federal agency actions to be consistent with the policies of the state coastal zone management program when conducting or supporting activities that affect a coastal zone. The Louisiana Department of Natural Resources (LDNR) regulates development in Louisiana's designated coastal zone through the Coastal Use Permit Program.

The USFWS regulates federal funding in Coastal Barrier Resource System (CBRS) units under the Coastal Barrier Resources Act (CBRA). This Act encourages conservation of undeveloped coastal barriers and related areas (*i.e.*, Otherwise Protected Areas) by restricting federal funding, such as federal flood insurance, for projects that support development in these areas. The Act promotes appropriate use and conservation of coastal barriers along the Gulf of Mexico.

4.3.2 Existing Conditions

The existing facility and the proposed project site are located in the coastal zone and may be required to obtain a Coastal Use Permit prior to construction (Appendix B). The proposed project site is not located within a regulated CBRS unit.

4.3.3 Environmental Consequences

Alternative 1 – No Action

The No Action alternative would entail no undertaking and therefore, would have no impact on a coastal zone or a CBRS unit.

Alternative 2 – Demolition with Remediation

Demolition and remediation would involve construction activities in a designated coastal zone. Per a letter from LDNR Office of Coastal Management dated February 28, 2012, the granting of federal financial assistance as defined in 15 CFR §930.91 is fully consistent with the Louisiana Coastal Resources Program (LCRP). Consistency with the LCRP does not exempt applicants from the need to obtain a Coastal Use Permit if required. HANO is responsible for coordinating with LDNR Office of Coastal Management to obtain any Coastal Use Permit that may be required as a result of this project.

The project site is not located within a CBRS unit; therefore, the action does not trigger the CBRA.

Alternative 3 – Demolition to Concrete Slab with No Remediation (Proposed Action)

The proposed action alternative would involve construction in a designated coastal zone. Per a letter from LDNR Office of Coastal Management dated February 28, 2012, the granting of federal financial assistance as defined in 15 CFR §930.91 is fully consistent with the LCRP. Consistency with the LCRP does not exempt applicants from the need to obtain a Coastal Use Permit if required. HANO is responsible for coordinating with LDNR Office of Coastal Management to obtain any Coastal Use Permit that may be required as a result of this project.

The project site is not located within a CBRS unit; therefore, the action does not trigger the CBRA.

4.4 Biological Resources

4.4.1 Regulatory

The Endangered Species Act (ESA) of 1973 prohibits the taking of listed, threatened, and endangered species unless specifically authorized by permit from the USFWS or the National Marine Fisheries Service. "Take" is defined in ESA Section 3 as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect or attempt to engage in any such conduct". "Harm" is further defined by the ESA regulations to include significant habitat modification or degradation that results in death or injury to listed species by significantly impairing behavioral patterns such as breeding, feeding, or sheltering.

4.4.2 Existing Conditions

One mammal species, the West Indian manatee, and two fish species, the Gulf sturgeon and pallid sturgeon, are federally listed as threatened or endangered and are known to occur in select waterways of Orleans Parish (Table 2). An individual bird species, Sprague's Pipit, is federally

listed as a Candidate species and may occur in the vicinity of the proposed project (Table 2). Current data suggests its non-breeding, overwintering range extends from central Louisiana westward to Texas, south to Mexico and northward including the southern regions of New Mexico and Arizona (Robbins and Dale, 1999).

Table 2 - Federally Listed Species Known to Occur in Orleans Parish

Common Name	Scientific Name	Federal Status	Critical Habitat	Habitat Requirements	Impact* / Rationale
Birds					
Sprague's Pipit	<i>Anthus spragueii</i>	Candidate	No	Grassland bird that overwinters during its non-breeding season from western Louisiana to Mexico and southwestern states.	None / project area is outside the suggested overwintering range of this species.
Fishes					
Gulf sturgeon	<i>Acipenser oxyrinchus desotoi</i>	Threatened	Yes ²	Anadromous fish species that spends most of its life in freshwater habitats and spawns in estuarine bays. Found in a variety of substrate areas based on age class of species.	None / project area is located downstream of critical habitat areas. Any potential storm water runoff would not impact this species.
Pallid sturgeon	<i>Scaphirhynchus albus</i>	Endangered	No	Prefers large, free-flowing turbid rivers. No information exists on preferred spawning habitat.	None / less than significant impact could occur from storm water runoff.
Mammals					
West Indian manatee	<i>Trichechus manatus</i>	Endangered	Yes ¹	Found in marine, estuarine, and freshwater environments with a strong preference for warm and well vegetated waters.	None / there are no habitat areas that are close or hydrologically connected to potential habitat within project area.
<p>* Considers potential impacts of Alternatives 1 - 3. 1 Critical habitat is not designated in Louisiana. 2 Species may occur in Orleans Parish, but not within the proposed project area.</p>					

- Data accessed 4/23/2012 from USFWS IPaC Web Portal (<http://ecos.fws.gov/ipac/>)

4.4.3 Environmental Consequences

Alternative 1 – No Action:

The No Action alternative would entail no undertaking and therefore, would have no impact on species federally listed as threatened or endangered.

Alternative 2 – Demolition with Remediation

Demolition and remediation of Press Park would have no impact on species federally listed as threatened or endangered. Per the USFWS website www.usfws.gov/lafayette, accessed April 10,

2013, the project is not an activity that would affect a federally listed threatened or endangered species; nor is there proposed or designated critical habitat present within this Parish. In correspondence dated February 28, 2013, the Louisiana Department of Wildlife and Fisheries concurred that the project, as proposed, would have no effect on federal trust resources under its jurisdiction and currently protected by the ESA (Appendix B).

Alternative 3 – Demolition to Concrete Slab with No Remediation (Proposed Action)

The proposed action would have no impact on species federally listed as threatened or endangered. Per the USFWS website www.usfws.gov/lafayette, accessed April 10, 2013, the project is not an activity that would affect a federally listed threatened or endangered species; nor is there proposed or designated critical habitat present within this Parish. In correspondence dated February 28, 2013, the Louisiana Department of Wildlife and Fisheries stated the proposed project would have no effect on federal trust resources under its jurisdiction and currently protected by the ESA (Appendix B).

4.5 Cultural Resources

4.5.1 Regulatory

The consideration of effects to historic and cultural resources is mandated under Section 101(b)4 of NEPA as implemented by 40 CFR Part 1501-1508. Requirements include the identification of significant or historic properties that may be affected by the proposed action or alternatives within the project's area of potential effects (APE). Historic and cultural resources are defined as archaeological sites, standing structures or other historic or cultural resources identified through consultation with interested parties and during the scoping process. Historic and cultural resources include but are not limited to properties listed in or determined eligible for listing in the National Register of Historic Places (NRHP) and sites of religious or cultural significance to federally-recognized Indian Tribes or the local community. FEMA is required to address potential impacts to any historic or cultural resources through Section 106 of the National Historic Preservation Act's (NHPA) Section 106 consultation process. Federal agencies must take into account their effects on historic resources and allow the Advisory Council on Historic Preservation the opportunity to comment.

In order to fulfill its Section 106 responsibilities, FEMA has initiated consultation on this project in accordance with the Statewide Programmatic Agreement dated August 17, 2009, and amended on July 22, 2011, between the Louisiana State Historic Preservation Officer (SHPO), the Louisiana Governor's Office of Homeland Security and Emergency Preparedness (LA GOHSEP), the Alabama-Coushatta Tribe of Texas, the Caddo Nation, the Chitimacha Tribe of Louisiana, the Choctaw Nation of Oklahoma, the Coushatta Tribe of Louisiana, the Jena Band of Choctaw Indians, the Mississippi Band of Choctaw Indians, the Quapaw Tribe of Oklahoma, the Seminole Nation of Oklahoma, the Seminole Tribe of Florida, the Tunica-Biloxi Tribe of Louisiana, and the Advisory Council on Historic Preservation. The PA was created to streamline the Section 106 review process.

4.5.2 Existing Conditions

Based on research using the NRHP 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 listed or eligible historic district (National Park

Service, 2011; Louisiana Division of Historic Preservation, 2011; FEMA Louisiana Recovery Office, 2011). Additionally, there are no individually listed or eligible resources located within the project area. FEMA determined that the buildings did not meet the 50-year criterion for NRHP listing, nor did they possess the level of significance to qualify for NRHP listing under Criterion Consideration G of the NRHP guidelines. SHPO concurrence with FEMA's determination was dated October 17, 2007.

Upon consultation of data provided by the SHPO office, there are no known archaeological or historic sites located within a 0.5 mile radius of the project area (Louisiana Division of Historic Preservation, 2011). The project area is situated within low-lying bottomlands, and soils are of the Harahan-Rita-Westwego association, which are fresh organic and mineral deltaic deposits (U.S. Department of Agriculture, 2011). The project area has not been surveyed for cultural resources and lies within the Orleans Parish Low Probability Zone for potential archaeological or historic resources (FEMA, 2006). Consultation of earlier historic maps shows no development in the area. The most recent (1937-1951) Sanborn Insurance maps show the development of city blocks within the area, but no structures are present (Sanborn Map Company, 1937).

4.5.3 Environmental Consequences

Alternative 1 – No Action Alternative

The No Action alternative does not include any FEMA undertaking; therefore FEMA has no further responsibilities under Section 106 of the NHPA.

Alternative 2 – Demolition with Remediation

In a letter dated October 9, 2007, FEMA determined that the demolition of the buildings would have no effect on historic properties. SHPO concurrence with this determination was received by FEMA on October 17, 2007. Additionally, Leaf Environmental consulted with SHPO on the demolition of the Press Park buildings in letter correspondence dated October 2009; August 19, 2011; and September 1, 2011. SHPO's concurrence that the demolition would have no effect on historic properties was received on November 4, 2009; September 19, 2011; and October 3, 2011.

Alternative 3 – Demolition to Concrete Slab with No Remediation (Proposed Action)

In a letter dated October 9, 2007, FEMA determined that the demolition of the buildings would have no effect on historic properties. SHPO concurrence with this determination was received by FEMA on October 17, 2007. Additionally, Leaf Environmental consulted with SHPO on the demolition of the Press Park buildings in letter correspondence dated October 2009; August 19, 2011; and September 1, 2011. SHPO's concurrence that the demolition would have no effect on historic properties was received on November 4, 2009; September 19, 2011; and October 3, 2011.

4.6 Hazardous Materials

4.6.1 Regulatory

The management of hazardous materials is regulated under various federal and state environmental and transportation laws and regulations, including the Resource Conservation and Recovery Act (RCRA) the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Emergency Planning and Community Right-to-Know Act, the Hazardous Materials Transportation Act, and the Louisiana Voluntary Investigation and

Remedial Action statute. The purpose of the regulatory requirements set forth under these laws is to ensure the protection of human health and the environment through proper management (identification, use, storage, treatment, transport, and disposal) of these materials. Some of these laws provide for the investigation and cleanup of sites already contaminated by releases of hazardous materials, wastes, or substances.

Louisiana regulates asbestos under the Louisiana Administrative Codes Title 33: Part III Chapter 27 (LAC 33:III.Chapter 27) Asbestos-Containing Material in Schools and State Buildings, and LAC 33:III Chapter 51 Comprehensive Toxic Air Pollution Emission Control, Subchapter M, Asbestos – Section 5151: Emission Standards for Asbestos. Since these regulations parallel federal regulations and in some areas are more stringent than the federal requirements, on May 11, 1995, USEPA waived all requirements of federal rule, Asbestos-Containing Materials in Schools (40 CFR 763 Subpart E) in Louisiana in lieu of the Louisiana asbestos regulations. The US Department of Labor, Occupational Safety and Health Administration (OSHA) regulates the protection of workers when working around asbestos. 29 CFR 1910 Sections 120, 132, 134, 145, 146 and 1001 and 29 CFR 1926 Sections 20-35, 59, 95-107 and 1101 are most of the OSHA regulations that apply.

4.6.2 Existing Conditions

The land on which Press Park is situated was formerly part of the Agriculture Street Landfill (EPA Registry ID: 110009336557; EPA, 2012), an active municipal landfill for the New Orleans area from approximately 1909 to 1958. During its operation, the landfill received municipal wastes as well as ash from nearby incinerators. Additionally, open-burning was utilized frequently as a method for waste reduction at the site. In 1965, the landfill was briefly reopened to burn debris and waste resulting from the clean-up efforts in the aftermath of Hurricane Betsy (EPA, 2012). Beginning in the 1970s and continuing into the late 1980s, the northeastern section of the landfill site, approximately 47 acres, was developed for residential use. Developments included private single- and multi-family residences, a shopping center, a community center, an electrical substation, and an elementary school that included a playground complex (EPA, 2011). The remainder of the landfill site, approximately 48 acres, remained undeveloped and heavily vegetated.

The Agriculture Street Landfill site was placed on the National Priority List (NPL) in 1994 by the USEPA after investigations recorded elevated levels of COPCs consisting of lead, arsenic, and cPAHs in the soil (IT/OHM, 1999 and EPA, 2008). The site was divided by the USEPA into five OU (Figures 5 and 6), which are listed as follows (EPA, 2008):

- OU1: Undeveloped Property
- OU2: Residential Properties, which consist of the Gordon Plaza apartments, single-family dwellings in the Gordon Plaza subdivision, Press Court townhomes, retail businesses and HANO's Press Park Housing Development
- OU3: Shirley Jefferson Community Center, also known as Press Park Community Center
- OU4: Moton Elementary School, which includes Mugrauer Playground
- OU5: Groundwater



Figure 5 - Press Park Operable Units (EPA, 2011)



Figure 6: Aerial Image of Press Park Operable Units (EPA, 2008)

Beginning in March 1994, USEPA installed an eight-foot high chain link fence topped with barbed wire around the entire undeveloped portion of the former landfill (OU1) in a time-critical removal action. Several gates were installed to facilitate vehicular access by utility companies to electrical lines that traverse the site. USEPA conducted a second time-critical removal action at the site in February 1995. The removal action consisted of removing playground equipment and covering contaminated soil at OU3 with heavy grass sod. A third time-critical removal action was completed in March 1996 by USEPA to repair the fence surrounding OU1, which had been damaged by trespassers.

On September 2, 1997, a ROD for OU4 and OU5 was signed requiring no further action as there was no identifiable risk to human health (EPA, 1997). The Moton Elementary School (OU4) was built on a three foot layer of clean fill, which addressed all risks posed by this portion of the site. Regarding the ground water (OU5), residents in the site area were confirmed to be served by the municipal drinking water supply of the City of New Orleans, and information obtained from the LDEQ during site investigation activities confirmed that ground water beneath the site is not used for any beneficial purpose and should not be considered a potential source of drinking water. In addition, site ground water presents no other pathway of exposure (to surface water, for example). The ROD for OU4 and OU5 recommended that both OUs be deleted from the NPL. After public notice and an opportunity for public comment, OU4 and OU5 were deleted from the NPL on June 15, 2000.

Also on September 2, 1997, the USEPA issued an Action Memorandum authorizing a Non-Time Critical Removal Action for OU1, OU2, and OU3 (EPA, 1997). It resulted in two separate response phases: Phase I from October 1998 to February 2000 and Phase II from August 2000 to April 2001 (EPA, 2000 and 2008, respectively). Response actions created by the Action Memorandum and conducted during the remediation phases eliminated human risk by excavating the top 12 inches to 24 inches of soil, placing a geotextile filter fabric covered with orange netting in order to delineate contaminated soil from clean fill, and replacing the top 12 to 24 inches of soil with clean fill. OU1 was cleared of vegetation and graded followed by the placement of a geotextile filter fabric, as well as the orange netting, on the subgrade, which was then covered with 12 inches of clean fill. The purpose of the geotextile filter fabric was to create a physical barrier between clean cover soils and contaminated subsoil. For OU2 and OU3, the top 24 inches of existing and waste material on the residential properties and community center were excavated and transported off-site for disposal. A permeable geotextile filter fabric, as well as the orange netting, was placed on the sub-grade and covered with 24 inches of clean fill (EPA, 2011). The clean fill was then covered with grass sod, landscaping and yard restoration, driveway and sidewalk replacement, and final detailing. After conclusion of the second phase response action, USEPA had implemented the removal action on 99% of the site (nine private homeowners elected not to participate in the removal action). At the conclusion of each phase of the response action, a Closeout Completion Package was provided to each owner of property in OU 1, 2, or 3 who participated in the removal action. The package contained a Closeout Letter; a Certificate of Completion; and instructions on how to maintain the permeable cap, including instructions for any necessary excavation below the geotextile filter/orange netting. Owners of properties that were not part of the response action received a letter and fact sheet from USEPA stating that maintaining the surface vegetation will minimize the potential exposure to contaminants in the subsurface soils and will prevent soil erosion. The letter also informed the residents that the contaminants of concern do not readily dissolve in water, but adhere to soil

particles. Thus, in the event of a flood, the contaminants in the subsurface soil are expected to remain in place and not pose an additional risk of exposure to the residents. USEPA coordinated with the utility companies serving the communities within the site's boundary. The USEPA developed Technical Abstract papers providing instructions for utility repair excavations, which would ensure the continued integrity of the permeable barrier on those properties where it was installed. Instructions for excavation both above and below the geotextile barrier were included in the paper. Copies of the Technical Abstracts were provided to all of the utility companies and also made available at the repositories. The USEPA also conducted a field demonstration of excavation and backfill procedures for utility companies at the site on December 1, 1999. In 2002, a second ROD issued by the USEPA for OU1, OU2 and OU3 required no further action as the clean-up under the 1997 Action Memorandum addressed the on-site contamination related concerns (EPA, 2002).

In August 2005, floodwaters resulting from Hurricane Katrina deposited sediment across many parts of New Orleans, including Press Park. In September 2005, a comprehensive investigation to characterize any potential environmental effects to parishes flooded by up to ten feet of water from Lake Pontchartrain and the Mississippi River / Gulf of Mexico outlet was conducted by the EPA as part of a characterization of post-hurricane conditions (EPA, 2006). Nine samples of flood-deposited sediments were collected from the Agriculture Street Landfill / Press Park area and were analyzed for over 200 organic contaminants, including metals and poly-aromatic hydrocarbons (PAHs). Results from the analytical sampling indicated benzo(a)pyrene, a PAH, was found in a small section of the site. Per the USEPA findings, it was determined further analysis would be conducted in the affected area (EPA, 2005). USEPA assessed and sampled the site on October 1 and 2, 2005 for both lead and arsenic and again on October 28, 2005 for Target Analytical List (TAL) metals and PAHs. The results of these analyses reported that flooding did not cause any upward movement of lead through the remediated soil; however, benzo(a)pyrene, which is considered a cPAH, was reported as containing levels that exceeded LDEQ's Risk Evaluation / Corrective Action Program (RECAP) criteria. On February 16 and 17, 2006, USEPA re-examined benzo(a)pyrene levels through sediment sampling to determine potential health risks to humans. On August 29, 2006, the U.S. Department of Health and Human Services concluded in a Health Consultation report that without data to confirm the total PAH concentrations have degraded below levels of concern, the incidental ingestion of soil containing benzo(a)pyrene poses an indeterminate public health hazard. The report further concluded the majority of the contaminants detected in flood-deposited sediments and soils at the site posed no apparent public health hazard to residents (DHH, 2006). Due to hurricane related damage to site structures, sediment sample readings, a rash of illegal dumping reports and community concerns on the integrity of the earthen protective layer (cap) over the former Agriculture Street Landfill site, the perimeter of Press Park OU2 and OU3 was fenced-in and considered abandoned. In January 2008, a Consent Decree between the USEPA and the City of New Orleans was signed outlining cover maintenance and Institutional Controls (ICs) for OU1, OU2, and OU3 (EPA, 2008).

In April 2008, a Second Five – Year Review Report for the Agriculture Street Landfill Superfund Site was published that addressed the earthen cap maintenance issues, ICs for dealing with property owners and local utilities, and further Consent Decree agreements between the USEPA and the City of New Orleans. Currently, semi-annual inspections are performed by the

LDEQ on all OUs to address any site issues agreed upon within the Consent Decree, including maintenance activities and reports of illegal dumping (EPA, 2008).

Leaff Environmental, Inc. conducted an asbestos survey of Press Park between May 19th and June 16th, 2011. Asbestos-containing materials (ACM) found in the apartment buildings, townhomes, and community center included 9x9 and 12x12 vinyl floor tiles, textured wall paint, paneling, vinyl sheeting, and stick-on floor tiles.

Other hazardous materials identified at the site include:

- fluorescent and sodium vapor lights that may contain mercury and polychlorinated biphenyls (PCBs)
- electronic equipment such as televisions and computer equipment
- paint
- smoke detectors that may contain the radioactive element americium 24
- white goods such as refrigerators and ovens that may contain Freon or gas cylinders
- household chemicals
- fire extinguishers
- petroleum products
- batteries from an electronic wheelchair, exit signs, and smoke and carbon monoxide detectors
- thermostats that may contain mercury
- HVAC and window A/C units that may contain Freon
- tires
- unlabeled buckets
- poles that may have been treated with creosote

4.6.3 Environmental Consequences

Alternative 1 – No Action Alternative

The No Action alternative would not disturb any hazardous materials or cause disturbance to the cap and soil cover in place.

Alternative 2 – Demolition with Remediation

Under this alternative, soils at the site would be remediated in accordance with protocols established by the USEPA. Remediation activities include removing contaminated soils to a depth of 24 inches below ground surface followed by the installation of a geo-textile filter fabric and an orange netting to delineate the contaminated fill from the clean fill. The clean fill would then be covered sod to prevent erosion. Specific operation and maintenance controls would be required to maintain the integrity of the cap because contaminants will be left in place beneath the geo-textile filter fabric. Per a Consent Decree between the City of New Orleans and the USEPA, excavation activities must adhere to standard operating procedures outlined in the Technical Abstract for Utilities operating within the Agriculture Street Landfill site. The Consent Decree also states that commencing on the date of the lodging of the Decree, the City of New Orleans shall refrain from using the Agriculture Street Landfill site in any manner that would interfere or adversely affect the implementation, integrity, or protectiveness of the remedy. Site use and activity restrictions include, but or not limited to, disturbance to the surface or subsurface soil of the Agriculture Street Landfill, including filling, drilling, excavation, or

construction on the site, that is unrelated to the remedy measures implemented at the Agriculture Street Landfill site, unless such excavation is consistent with the Technical Abstract for Utilities (EPA, 2008).

The Press Park structures contain ACM; therefore, demolition to the buildings would disturb hazardous materials. Demolition activities shall comply with all local, state, and federal abatement and disposal requirements under the National Emissions Standards for Hazardous Air Pollutants (NESHAP) and Louisiana Administrative Code 33:III 5151. Furthermore, disposal of demolition debris must be in accordance with all federal, state, and local laws, regulations, and rules. Prior to disposal, the applicant must identify and provide to FEMA and GOHSEP the waste disposal site, including the complete name, location, telephone number, and contact person of the facility. Due to the presence of the Agriculture Street Landfill Superfund site and the potentially hazardous nature of material to be removed from the site, all construction and demolition debris must be disposed in a Type I Industrial Landfill. The disposal facility must be permitted by the State of Louisiana Department of Environmental Quality Permit Support Division to receive Regulated Asbestos Containing Material. Waste must be packaged, labeled, manifested, and transported in accordance with LDEQ regulations and requirements.

Moreover, all other hazardous materials shall be removed, handled, transported and disposed of in accordance with local, state and federal compliance requirements.

Alternative 3 – Demolition to Concrete Slab with No Remediation (Proposed Action)

Under the Proposed Action, the site would not be remediated. The purpose of the response actions conducted at the site was to protect public health and the environment from releases or threatened releases of hazardous substances associated with the historic landfill. The primary threats that the site posed to public health were direct and indirect contact, ingestion, and inhalation of soil and waste that contain COPCs at concentrations that could pose unacceptable risks to a potentially exposed individual and ecological receptors; and the release of COPC-contaminated dust to the air at concentrations that could adversely affect human health and the environment. However, the USEPA determined, after the conclusion of the second phase response action, that the removal action implemented covered 99% of the site and therefore, determined No Further Action was necessary to protect public health or welfare or the environment. Furthermore, leaving the slabs as well as the associated walk and driveways in place, will act as a cover for the remaining soils that were not covered in the remedy actions.

The Press Park structures contain ACM; therefore, demolition to the buildings will disturb hazardous materials. Demolition activities shall comply with all local, state, and federal abatement and disposal requirements under the National Emissions Standards for Hazardous Air Pollutants (NESHAP) and Louisiana Administrative Code 33:III 5151. Furthermore, disposal of demolition debris must be in accordance with all federal, state, and local laws, regulations, and rules. Prior to disposal, the applicant must identify and provide to FEMA and GOHSEP the waste disposal site, including the complete name, location, telephone number, and contact person of the facility. Due to the presence of the Agriculture Street Landfill Superfund site and the potentially hazardous nature of material to be removed from the site, all construction and demolition debris must be disposed in a Type I Industrial Landfill. The disposal facility must be permitted by the State of Louisiana Department of Environmental Quality Permit Support Division to receive Regulated Asbestos Containing Material. Waste must be packaged, labeled, manifested, and transported in accordance with LDEQ regulations and requirements.

Moreover, all other hazardous materials shall be removed, handled, transported and disposed of in accordance with local, state and federal compliance requirements.

4.7 Environmental Justice

4.7.1 Regulatory

EO 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, was signed on February 11, 1994. The EO directs federal agencies to make achieving environmental justice part of their missions by identifying and addressing, as appropriate, disproportionately high adverse human health, environmental, economic, and social effects of its programs, policies and activities on minority or low-income populations.

Environmental Justice is a priority to HANO's mission, which is to provide and encourage the development of quality, affordable housing and the preservation of healthy, vibrant neighborhoods for the citizens of New Orleans in a manner that promotes self-sufficiency and economic opportunity. HANO, in an effort to execute their mission, has engaged in a massive redevelopment initiative. A portion of their redevelopment program includes demolition of homes that are no longer habitable under basic living conditions. Press Park, part of HANO's scattered site portfolio, is included in this redevelopment program.

4.7.2 Existing Conditions

Press Park is situated within a portion of the USEPA Agriculture Street Landfill, which is designated as a Superfund site by the USEPA. This site has been partially remediated (green space and under sidewalks). However, the soils under the parking areas, driveways, and building foundations still contain the following contaminants of concern: lead, arsenic and cPAHs (IT/OHM, 1999 and EPA, 2008). Additionally, the structures are dilapidated and serve as a haven for crime, vagrancy, and vermin that could potentially spread diseases.

Press Park was inhabited by a large number of low-income and minority populations prior to Hurricane Katrina. Damage to the housing development as a result of Hurricane Katrina, as well as the existing environmental conditions, have made the development uninhabitable for residents. Engineering and environmental evaluations of the damages sustained to the housing complex following the hurricane, in addition to the environmental circumstances associated with the site, do not support repair or renovations to the units. Therefore, HANO proposes to demolish the HANO-owned units to the slab with no redevelopment of the site. As a result, it is necessary to investigate environmental justice issues in order to determine whether or not the individuals that have been displaced from their housing units as a result of the hurricane have had disproportionately high or adverse human health and environmental effects based on their race or level of income.

Information was obtained from the U.S. Census Bureau Fact Finder website in order to determine the percentage of minority and low-income for New Orleans zip code 70126, which includes Press Park. Facts attained from the website indicate population percentages in 2010 were: 91.3 percent black, 5.6 percent white, 2.5 percent Hispanic, 0.6 percent Asian, and 0.2 percent Native American. The 2007-2011 American Community Survey five-year median household income for New Orleans zip code 70126 is \$30,445 (in 2011 inflation-adjusted dollars) and the 2010 median household income for the New Orleans Metropolitan Area, which includes Kenner and Metairie, is \$46,134 (U.S. Census Bureau, 2010).

4.7.3 Environmental Consequences

The goal of environmental justice is to identify and address potential disproportionately high and adverse human health and environmental effects on minority populations and low income populations, including interrelated social and economic effects, and to identify alternatives that may mitigate the impacts. Since the proposed project will affect low-income and minority populations that inhabited Press Park, this section will investigate the consequences as required by EO 12898.

The following key issues were addressed with regard to potential environmental justice issues:

- Are there impacts caused by the proposed action? Yes. The proposed action would only demolish the HANO-owned units to the concrete slab. Therefore, blighted property would still remain in predominantly low-income, minority community. However, HANO is in the process of redeveloping properties throughout the City of New Orleans to provide low-income, minority citizens with the opportunity to live in modern housing that is located in areas with better access to schools, community centers, transportation, parks, and shopping centers.
- Is the proposed project site environmentally unsuitable? Yes. Press Park is situated on a portion of the historic Agriculture Street Landfill, which is an USEPA Superfund site.
- Has an action been undertaken without considerable input by the affected low-income and / or minority community? No. Public involvement was initiated prior to the site being placed on the NPL (EPA, 1997). Prior to Hurricane Katrina, the Louisiana Office of Public Health and the Agency for Toxic Substances and Disease Registry established a community assistance panel for citizens living near the Agriculture Street Landfill site. Additionally, the USEPA opened an outreach office on the site in April 1994 to involve the community with respect to the technical and administrative process of remediating a Superfund site. Residents were also in negotiation with HANO regarding relocation and homeowner buy-outs (EPA, 1997). Post-Katrina, HANO has engaged in public meetings concerning their redevelopment plans on eight separate occasions, taking into consideration the feedback provided by the stakeholders. No concerns regarding the demolition and remediation of Press Park were noted during this time. HUD also conducted an EA for the Press Park demolition, which resulted in a FONSI (Leaff, 2011). HANO, through the City of New Orleans, published a public notice relating to the FONSI on December 23, 2011 with the public comment period running through January 9, 2012 (Appendix A). Neither the City of New Orleans nor HANO received any substantive comments for the public notice (HANO, 2012). Furthermore, FEMA will post a display public notice in *The Times-Picayune* and *The Advocate* as well as mail copies of the public notice to residents within the surrounding community to publicize the EAs availability for review at the local repositories. FEMA will also have a phone number available to the public for the duration of the demolition activities.

Alternative 1 – No Action

The No Action alternative would not involve the implementation of a federal program, policy or activity. However, no action will have a negative impact to the adjacent and surrounding areas of minorities and low to moderate income populations by leaving blighted structures that present a risk to health and safety.

Alternative 2 – Demolition with Remediation

Former residents would have the opportunity to relocate to communities that have been redeveloped with modern housing. This action is anticipated to have a positive impact for the former residents and community.

Alternative 3 – Demolition to Concrete Slab with No Remediation (Proposed Action)

Former residents would have the opportunity to relocate to communities that had been redeveloped with modern housing. This action is anticipated to have a positive impact for the former residents and community.

5.0 CUMULATIVE IMPACTS

According to the CEQ regulations, cumulative impacts represent the impact on the environment that result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions, regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time (40 CFR 1508.7). In accordance with NEPA, and to the extent reasonable and practical, this EA considered the combined effects of the Proposed Action Alternative and other actions occurring in the vicinity of the proposed project site. There are numerous repair projects to buildings, roads, recreational facilities, and public utilities to restore pre-disaster conditions surrounding the project site. Additionally, the community is undergoing restoration and repair using non-FEMA funding. In reviewing impacts, socioeconomic resources were identified as having the most potential to experience cumulative effects. However, although devastating, the storm created an opportunity for the applicant to build a better functioning and equitable housing system available to eligible citizens by the demolition, repair, reconstruction, and consolidation of its residential properties. Therefore, the cumulative impact of the proposed action would be minimal and would not significantly affect the human environment.

6.0 CONDITIONS AND MITIGATION MEASURES

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

General

- All work shall be performed in accordance with USEPA established protocols and monitored by Louisiana Department of Environmental Quality (LDEQ) in accordance with the USEPA Record of Decision (ROD). The Applicant and/or the City of New Orleans will be responsible for maintaining the cap for the life of the property as required by the ROD.
- Applicant's contractors and/or subcontractors shall conduct all work within the guidelines established by the Consent Decree between the USEPA and the City of New Orleans.
- Applicant's contractors and/or subcontractors shall perform all work in accordance with the HANO Environmental Site Preparation and Additional Service Part A: Non-Environmental Technical Specifications and Part B: Environmental Technical Specifications.
- The Applicant shall permit a FEMA environmental monitor on-site during the demolition activities to ensure compliance with NEPA and other local, state and federal regulations and Executive Orders as outlined in the conditions of the EA.

Safety

- The Applicant will be required to have a certified hazardous materials contractor monitor the demolition activities for the duration to ensure all safety standards are strictly adhered to.
- As this is a Superfund Site, the contractor will be required to have a specialty contractor's license for hazardous materials and all personnel must be trained in accordance with U.S. Occupational Health and Safety Administration's (OSHA) Hazardous Waste Operations and Emergency Response (HAZWOPER) standards.
- To minimize worker and public health and safety risks from project construction and closure, all construction and closure work must be done using qualified personnel trained in the proper use of construction equipment, including all appropriate safety precautions. Additionally, all activities must be conducted in a safe manner in accordance with the standards specified in OSHA regulations.
- Appropriate signage and barriers shall be in place prior to construction activities in order to alert pedestrians and motorists of project activities and traffic pattern changes. The contractor will implement traffic control measures, as necessary.
- Applicant is responsible for maintaining site perimeter fencing as well as ground cover. Additionally, non-HANO owned units shall be braced to maintain a reasonable standard of safety and longevity.

Utilities Locate (LA OneCall)

- Louisiana law (Part VII of Chapter 8 of Title 40, and the sections as R.S. 40:1749.11 to 40:1749.26) requires excavators and demolishers to call a regional notification center prior to beginning work. Prior to any excavation or demolition, each excavator or demolisher, including cable television owners or operators, shall serve telephonic notice of the intent to excavate or demolish to the regional notification center serving the area in which the proposed excavation or demolition is to take place. Such notice shall be given to the notification center at least 96 hours, but not more than 120 hours (excluding weekends and holidays) prior to the commencement of any excavation or demolition activity. See entire laws at www.laonecall.com or call 1-800-272-3020 for more information.

Permits

- In accordance with applicable local, state, and federal regulations, the applicant is responsible for acquiring any necessary permits prior to commencing construction at the proposed project site.

Asbestos-Containing Materials

- The applicant shall comply with all local, state and federal abatement and disposal requirements under the National Emissions Standards for Hazardous Air Pollutants (NESHAP) and Louisiana Administrative Code 33:III 5151. Demolition activities related to Possible Asbestos-Containing Materials (PACM) must be inspected for ACM/PACM where it is safe to do so. Should asbestos-containing materials (ACM) be present, the applicant is responsible for ensuring proper disposal in accordance with the previously referenced regulations. LDEQ must be notified of demolition activity prior to work commencing. All coordination pertaining to these activities should be documented and copies forwarded to the state and FEMA as part of the permanent project files.

Hazardous Waste [Resource Conservation and Recovery Act (RCRA)]

- The applicant is responsible for obtaining and/or complying with all federal, state and local permits, ordinances and/or requirements for the collection, handling, storage, transportation and disposal of any medical, hazardous, biological, radiological, pharmaceutical or toxic related waste or debris. Equipment such as ice machines, refrigerators, generators, air conditioning units, computers, and televisions may contain chlorofluorocarbons (CFCs), used oil, diesel and other petroleum products, mercury switches, used oil filters, fuel filters, and batteries. The applicant shall handle, manage, and dispose of damaged materials and equipment that may be hazardous waste, universal waste, and hazardous materials in accordance with the requirements of local, state, and federal regulations.
- Radioactive Hazards: Radioactive materials are regulated by both the state (LDEQ) and federal government (USEPA). If the smoke detectors will no longer be used and are determined to be waste, then proper handling, packaging, transportation and disposal will be required in accordance with LAC 33:XV and 10 CFR Parts 40 and 150.

- 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.
- Furthermore, if hazardous constituents are unexpectedly encountered in the project area during the proposed demolition operations, appropriate measures for the proper containment and management of the contamination shall be initiated in accordance with applicable federal, state, and local regulations.

Waste Transportation and Disposal

- Contractor and/or Subcontractors will properly handle, package, transport and dispose of hazardous materials and/or waste in accordance with all local, state and federal regulations, laws and ordinances including all OSHA worker exposure regulations covered within 29 CFR 1910 and 1926.
- All waste is to be transported by an entity maintaining a current "waste hauler permit" specifically for the waste being transported, as required by Louisiana Department of Transportation and Development (DOTD) and other regulations.
- Disposal of demolition debris must be in accordance with all federal, state, and local laws, regulations, and rules. Prior to disposal, the applicant must identify and provide to FEMA and GOHSEP the waste disposal site, including the complete name, location, telephone number, and contact person of the facility. Due to the presence of the Agriculture Street Landfill Superfund site and the potentially hazardous nature of material to be removed from the site, all construction and demolition debris must be disposed in a Type I Industrial Landfill. The disposal facility must be permitted by the State of Louisiana Department of Environmental Quality Permit Support Division to receive Regulated Asbestos Containing Material. Waste must be packaged, labeled, manifested, and transported in accordance with LDEQ regulations and requirements.

Surface Water and Water Quality

- LDEQ has storm water general permits for construction areas equal to or greater than one (1) acre. Construction contractor will be required to obtain applicable Louisiana Pollutant Discharge Elimination System (LPDES) permit and implement storm water pollution prevention plan. Additionally, best management plans (BMPs), such as the installation of silt fences and / or straw bales, shall be implemented to reduce sedimentation and pollution runoff. All precautions shall be observed to control nonpoint source pollution from construction activities. Contact the LDEQ Water Permits Division at (225) 219-9371 to determine required permits.
- All precautions shall be observed to protect the groundwater of the region.

Cultural Resources

- Louisiana Unmarked Human Burial Sites Preservation Act: If human bone or unmarked grave(s) are present within the project area, compliance with the Louisiana Unmarked Human Burial Sites Preservations 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.

- Inadvertent Discovery Clause: 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 (PA) contacts at FEMA, who will in turn contact FEMA Historic Preservation (HP) staff. The applicant will not proceed with work until FEMA HP completes consultation with the SHPO.

Floodplain

- The applicant is required to coordinate with the local floodplain administrator regarding floodplain permit(s) prior to the start of any activities. All coordination pertaining to these activities and applicant compliance with any conditions should be documented and copies forwarded to the LA GOHSEP and FEMA for inclusion in the permanent project files.

Coastal Resources

- The project has been found by the Louisiana Department of Natural Resources (LDNR) to be inside the Louisiana Coastal Zone; therefore, LDNR requires that a complete Coastal Use Permit Application package (Joint Application Form, locality maps, project illustration plats with plan and cross section views) along with the appropriate application fee be submitted to their office prior to construction.

7.0 AGENCY AND PERSONS CONTACTED

FEMA is the lead federal agency for conducting the NEPA compliance process for this Public Assistance project. It is the responsibility of the lead agency to conduct the preparation and review of NEPA documents in a way that is responsive to the needs of the Parish communities while meeting the spirit and intent of NEPA and complying with all NEPA provisions. As part of the development of early interagency coordination related to the proposed action, federal and state resource protection agencies were contacted and FEMA distributed an informal scoping notification through a Solicitation of Views. Agencies and persons contacted are noted Table 3.

Table 3 – Federal, State and Local Agencies and Persons Contacted

<p>Federal</p>	<p>U.S. Army Corps of Engineers Name: Karen L. Clement, Solicitation of Views Manager Office: New Orleans District, Operations Division Address: P.O. Box 60267, New Orleans, LA 70160 Correspondence Type: Letter Date of Correspondence: March 22, 2013</p> <p>U.S. Environmental Protection Agency Name: Ursula Lennox, Remedial Project Manager Office: US EPA Region VI Address: Dallas, TX 75202 Correspondence Type: Email, Telephone Date of Correspondence: Multiple Dates</p> <p>USFWS Name: Amy Trahan Office: Louisiana Field Office Address: 646 Cajun Dome Blvd., Ste 400, Lafayette, LA 70506 Correspondence Type: Phone Date of Correspondence: April 10, 2013</p>
<p>State</p>	<p>Louisiana Department of Environment Quality Name: Beth Altazan-Dixon Office: Business & Community Outreach Division Address: P.O. Box 4301, Baton Rouge, LA 70821 Correspondence Type: Email Date of Correspondence: March 8, 2013</p> <p>Louisiana Department of Natural Resources Name: Karl Morgan, Acting Administrator Office: Coastal Management Address: P.O. Box 44487, Baton Rouge, LA 70804 Correspondence Type: Letter Date of Correspondence: February 28, 2013</p> <p>Louisiana Department of Wildlife and Fisheries Name: Carolyn Michon Office: Natural Heritage Program Address: P.O. Box 98000, Baton Rouge, LA 70898 Correspondence Type: Letter Date of Correspondence: February 28, 2013</p> <p>SHPO Name: Ms. Pam Breaux and Mr. Derek Galose Office: State Historic Preservation Office Address: P.O. Box 44247, Baton Rouge, LA 70804 Correspondence Type: Letter Date of Correspondence: Multiple Dates</p>
<p>Local</p>	<p>HANO Name: Melissa Asfour Office: Housing Authority of New Orleans Address: 4100 Touro Street, New Orleans, LA 70122 Correspondence Type: E-mail, Meetings, Memos Date of Correspondence: Multiple Dates</p>

8.0 LIST OF PREPARERS

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