

Draft Environmental Assessment
New Orleans City Park Emergency Group Temporary Housing
New Orleans, Orleans Parish, Louisiana
Hurricane Katrina
FEMA-1603-DR-LA

A. Project: New Orleans City Park Emergency Group Temporary Housing Site

The City of New Orleans proposes to prepare approximately 65 acres of public land within New Orleans City Park (hereafter called City Park), to construct three (3) Emergency Group temporary Housing sites. City Park is a 1300-acre public park located south of Robert E. Lee Drive, north of City Park Drive, east of Wisner Boulevard and west of Marconi Drive. The housing sites would temporarily occupy approximately 5% of the park for a period not likely to exceed 18 months. At the end of the temporary housing period, City Park would be seeded and restored to its previous condition or used by New Orleans City Park in a manner consistent with local zoning requirements. The proposed housing sites are:

1. South Festival Park: The City proposes to temporarily install approximately 590 temporary travel trailer units on 37.9 acres of land (15.6 units/acre). The site is located in the southeast corner of City Park, north of Berky's Circle, south of Interstate-610, east of Golf Drive and west of Wisner Boulevard.
2. Zachary Taylor Park: The City proposes to temporarily install approximately 222 travel trailer units on approximately 14.26 acres of land (15.1 units/acre). The site is located in the southeast corner of City Park, north of Zachary Taylor Drive, west of Wisner Blvd.
3. Marconi Meadow Park: The City proposes to temporarily install approximately 174 travel trailer units on 10.25 acres of land (16.36 units/acre). The site is located in the southwest corner of City Park, north of Zachary Taylor Drive and east of Marconi Drive.



Figure 1: Map of City Park (1300 acres). Dark areas are proposed group temporary housing site locations (65 acres or 5% of City Park).

B. Introduction

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 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 proposes to administer this disaster assistance pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), PL 93-288, as amended. Section 408 of the Stafford Act authorizes FEMA's Individual Assistance Program to provide emergency temporary housing for disaster victims whose homes are uninhabitable or destroyed. This Draft Environmental Assessment (DEA) has been prepared in compliance with the National Environmental Policy Act of 1969 (NEPA); the President's Council on Environmental Quality regulations implementing NEPA (40 CFR 1500-1508); and FEMA's regulations implementing NEPA (44 CFR 10.9). The purpose of this DEA is to analyze potential environmental impacts of the proposed emergency group temporary housing site at City Park, as part of an expedited review process. FEMA will use the findings in this DEA to determine whether to prepare an Environmental Impact Statement (EIS) or a Finding of No Significant Impact (FONSI).

C. Purpose and Need

Catastrophic damage from Hurricane Katrina has resulted in an extraordinary demand for housing assistance in Orleans Parish. The purpose of this action is to fulfill FEMA's mandate under the Individual Assistance Program to expeditiously provide temporary housing for disaster victims until permanent housing can be established. To date, approximately 362,000 requests for federal assistance have been received for Orleans Parish. Of these requests, approximately 99 percent are residents from the City of New Orleans. An additional 16,800 are registrations from New Orleans showing Jefferson as the Parish. At this time, approximately 49,000 applications for housing assistance have been received for the Orleans Parish. The number of applications for housing assistance specifically for the City of New Orleans is not available at this time.

D. Project Alternatives and Site Selection Process

NEPA requires investigation and evaluation of reasonable project alternatives as part of the project environmental review process. FEMA's contractors review available aerial photos and maps, conduct site reconnaissance field surveys, and contact state and local officials to identify potential sites for use as temporary housing. An extensive search was conducted by the contractors "strike team" to find suitable sites large enough to support group housing sites. Factors considered in choosing a site include: site topography, property owner willingness, past land use (if it was previously planned for development), access to existing utilities, engineering feasibility, costs logistics and temporary housing. Due to the lack of available sites and the need for emergency temporary housing in the central area of the City of New Orleans (49,000 applications for housing assistance), the contractor identified two practicable alternatives; 1) The No Action Alternative, where FEMA would not build temporary housing, and 2) the Proposed Action, where FEMA would build three temporary housing parks located in the southern portion of City Park. In order to maximize the continued recreational value of the park and also minimize impact to the facilities, these three locations were selected as having the least impact to the overall historical, recreational and commercial values within the park.

Alternative 1 - No Action Alternative

Under the No Action alternative, FEMA would not fund the proposed temporary housing project. Hurricane victims from Orleans and Jefferson Parish would remain in schools, churches, shelters, motels, or remain with family members, friends or other locations until they can either find housing, or return to their communities and rebuild their homes. The no action alternative would result in further economic and personal hardships for affected residents and commercial businesses, disruption of school systems and school attendance and further strain the parish social and economic infrastructure.

Alternative 2 – Installation of Travel Trailers on developed land within New Orleans City Park

The three (3) proposed temporary housing sites are located within New Orleans City Park, a 1300-acre park owned by the City of New Orleans. The proposed sites would be located in the southern portion of City Park, on approximately 65 acres of land (5% of the park). The majority of the proposed sites are vegetated with ground cover consisting of approximately 80 percent mowed grass, 10 percent mature trees and 10% open meadow. The trees within City Park have been heavily damaged from hurricane winds and flooding from the levee breach.

The three group housing sites include South Festival Park, Zachary Taylor Park and Marconi Meadows Park. Approximately 986 travel trailers and other facilities (security, maintenance and administrative buildings) will be constructed within City Park to provide temporary housing for displaced disaster victims. At this time, the temporary emergency housing occupancy is not expected to exceed 18 months. Afterward, City Park would be seeded and restored to its previous condition or used by City Park in a manner consistent with local zoning requirements.

Utilities to be installed at each of the three sites, includes potable water, sewer, and electricity from the existing infrastructure. The city's utility infrastructure has the capacity to handle the temporary increase in services. Sewer, waterlines and electric will be buried underground with a minimum of a 3-foot cover. Each site would be prepped by mowing the grass and covering the area with geotechnical grade fabric and rock, as needed, to form the interior roadways and trailer pads. Existing trees would be left to maintain the visual aesthetics of the site and fenced to protect from harm. Any dead, declining or structurally weak trees will be removed as recommended by a professional arborist. Each site would have security fencing around the perimeter of the site. Electric transformers would be installed above ground and fenced off. Security guards would man the access points 24 hours/day, seven days a week. Guard shacks would be provided at each site. Alternative access points would be gated and locked only to allow access for emergency vehicles.

City Park mostly relies on private funding to maintain the park. The proposed temporary housing project would provide revenue for the park through lease agreements, allowing the park to rebuild infrastructure, provide recreational, educational and other opportunities as well as provide open green space for New Orleans residents. The proposed site locations, site descriptions and the number of proposed travel trailer units are described as follows:

Site 1: South Festival Park

Approximately 590 travel trailer units would be installed on approximately 40 acres. The South Festival Park site is located south of I-610. The site is relatively flat with rolling topography located in the south golf course area. The golf course has not been maintained due to the lack of funding. Bald cypress, sabel palm, live oak, red oak and camphor trees are interspersed throughout the site.

Storm water and site drainage will be collected by catch basins and piped to the city's sewer system. Access points would be located off Friedrichs Avenue and Golf Drive to provide safe ingress and egress for residents using the housing park. Site amenities include laundry trailers, an administration trailer, a mail building and a social services building. Trash dumpsters will be provided on site and maintained by the City of New Orleans. Two existing buildings are proposed to be renovated and used as a security building and a maintenance building. A 6-foot high chained link fence would be installed around the perimeter of the site. A 6-foot high wooden fence would be constructed on the west side of the site, adjacent to Christian Brothers Academy.

Site 2: Zachary Taylor Site

Approximately 222 travel trailer units would be installed on approximately 15 acres of land to provide temporary housing. The Zachary Taylor Site is located in the southeast corner of City Park, north of Zachary Taylor Drive and west of Wisner Boulevard. The site is rolling parkland with large trees interspersed throughout the site. Two access points would be provided off Zachary Taylor Road to ensure safe ingress and egress for residents using the housing park. Site amenities include a laundry trailer, a security trailer, an administration trailer, a maintenance building and a guard shack. The guard shack will be located at the main access point. Trash dumpsters will be provided for residents' use and maintained by the City of New Orleans.

Site 3 Marconi Meadows Site

Approximately 174 travel trailer units will be placed on 10.64 acres of land (16.36 units/acre) to provide temporary housing. The Marconi Meadows Site is located north of Zachary Taylor Drive, east of Marconi Drive and west of Magnolia Drive, an interior park road. The site is currently an open meadow area. The main access road would be located off Marconi Drive (with a gated access off Magnolia Drive) to ensure safe ingress and egress for residents using the housing park. Site amenities include laundry facilities, a security trailer, an administration trailer, a maintenance trailer and a guard shack. Trash dumpsters will be provided for residents' use and maintained by the City of New Orleans.

E. Affected Environment and Environmental Consequences

In order to meet the proposed purpose and need of timely delivery of emergency temporary housing, FEMA conducted an expedited environmental review process to identify environmental issues that need addressing. The environmental review process included several field reconnaissance visits, as well as background research and expedited agency consultation. The field reconnaissance visits were conducted by FEMA on September 30, 2005 and January 6, 2006. Background research consisted of a review of wetlands maps, census statistics, FEMA floodplain maps, air and water quality, hazardous materials databases, archaeological and historic structures databases, threatened and endangered species information, soil surveys, interviews with Park representatives, and other available information. Several design meetings have been held with contactors and representatives from multiple governmental agencies in order to design a temporary housing site conducive to residents and victims of Hurricane Katrina in the vicinity of the City of New Orleans, Orleans Parish and Jefferson Parish.

Alternative 1- No Action Alternative

The No Action alternative would not impact the environment and would not allow the federal government to adequately address the urgency for providing temporary emergency housing for displaced citizens within the vicinity of the City of New Orleans impacted by Hurricane Katrina. FEMA would not fund the proposed project and hurricane victims would stay with their families and friends or in schools, churches, shelters, motels or other locations until they can find other housing. This would result in further economic and personal hardships for affected residents, disrupt school attendance and the school system, and further strain the Parish social and economic infrastructure.

Alternative 2-Installation of Travel Trailers at Three Group Housing Sites within City Park (Proposed Alternative)

Field reconnaissance visits were conducted by FEMA on September 30, 2005 and January 6, 2006. Specific environmental and cultural impact issues were discussed during these visits. Major issues included the potential

for health and safety issues, the proposed restoration of existing historic buildings and impacts to subsurface Historic Properties, floodplain and hydrological (flooding) issues and the removal or preservation of existing trees. Based on the FEMA site reconnaissance and consultation with other state and federal agencies, the proposed project would not impact wetlands or waters of the United States, endangered or threatened species, coastal zone areas or degrade air/water quality.

Table 1 (below) summarizes the results of the environmental review process. 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 reviewed in the table and the appropriate investigation, coordination and consultation with regulatory agencies is conducted. When applicable, mitigation measures that would reduce any potential adverse effects are required as conditions for the project to proceed.

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Table 1. Affected Environment and Environmental Consequences Matrix

Resource Area	Impact Intensity				Impact Summary	Agency Coordination / Permits	Mitigation
	Negligible	Minor	Moderate	Major			
Geology and Soils	X				Potential for localized increase in soil erosion during construction. (See water quality section.)		See Water Quality section.
Hydrology and Floodplains (Executive Order 11988)	X				<p>Project area is located in a 100-year floodplain per the FEMA Flood Insurance Rate Map Zone A6 and A3, Community Panel No. 2252030095. Completion of this DEA is consistent with FEMA's 8 Step-Planning Process per Executive Order 11988 (Floodplain Management).</p> <p>The contractor will perform all drainage work in accordance with Orleans Parish standards and codes (as per site design). No impacts anticipated.</p>	<p>FEMA Flood Insurance Rate Map</p> <p>Site design by The Shaw Group, February 2006</p>	<p>This site is located in the floodplain and must accordingly comply with the minimum requirements of the National Flood Insurance Program (NFIP) as outlined in 44 CFR Part 60. Coordination must be done with the parish floodplain administrator to ensure compliance with the NFIP as administered in the local floodplain ordinance, which may be more stringent than the NFIP's minimum requirements, including issuance of appropriate permitting.</p> <p>Per 44 CFR 9.11(d)(8), minimization standards, existing flood warning and preparedness plans should be amended in consideration of the proposed action to minimize the effect of floods on human health, safety and welfare. This includes giving special consideration to unique hazard potential such as rapid-rise from a future flash flood. An evacuation plan that includes written evacuation procedures for the temporary housing site occupants must be prepared, posted and made available to them.</p>
Wetlands (Executive Order 11990)	X				<p>Wetlands were shown on the USFWS National Wetland Inventory (NWI) maps within City Park however, no wetlands were observed at the project site during the site visit. The wetlands shown on the NWI are constructed lagoons within the old golf course. The U S Army Corps of Engineers (USACE) reviewed recent maps, aerial photography, and soils data, and determined that the property is not in a wetland subject to Corps' jurisdiction and that a Department of the Army (DA) permit under Section 404 of the Clean Water Act will not be required for the deposition or redistribution of dredged or fill material on this site. No impacts anticipated.</p>	<p>USFWS NWI Map. Coordination with USFWS</p> <p>Site observations on January 6, 2006.</p> <p>Coordination with USACE on February 4, 2006 and February 6, 2006.</p>	

Resource Area	Impact Intensity				Impact Summary	Agency Coordination / Permits	Mitigation
	Negligible	Minor	Moderate	Major			
Coastal Zone Management	X				Project site is located within the boundaries of the Coastal Zone. The site is located in an urban area and previously disturbed. Therefore, no impacts to the Louisiana Coastal Zone are anticipated and a Louisiana Department of Natural Resources (LDNR), Coastal Management permit is not required	Louisiana Department of Natural Resources (LDNR) coordination letter dated September 21, 2005	
Water Quality	X				Preparation of the proposed site will require removal of vegetation. This may result in direct and indirect impacts from erosion and the release of sediments to associated downstream drainage systems (lagoons). In order to minimize impacts to any waters of the U.S., the contractor is required to implement Best Management Practices (BMPs) that meet the Louisiana Department Environmental Quality's permitting specifications for stormwater discharge. No impacts anticipated.	Louisiana Pollutant Discharge Elimination System (LPDES) permits for treatment of stormwater during construction permits CSW-G permit to be obtained by construction contractor.	Implement construction Best Management Practices, i.e., install silt fences, straw bales, etc. to reduce sedimentation. If fill is stored on site, the contractor would be required to cover it appropriately. Area soils or stockpiles shall be covered and/or wetted during construction to minimize dust. In order to convey stormwater runoff, the contractor will be required to design drainage features so that flows will not flood Park residents or surrounding properties during storm events. The drainage system will be required to meet local and parish requirements, including the acquisition of easements, if applicable. All permit conditions will be incorporated into the project design and implementation.
Air Quality	X				The proposed project includes activities that would produce a minor, temporary, and localized impact on air quality. Negligible impacts would be anticipated during construction. Federal and state air quality attainment levels would not be exceeded from vehicle emissions and dust particles.	EPA Region 6 designation. The site is located in an attainment area.	Area soils or stockpiles of soil would be covered and/or wetted during construction to minimize dust.
Vegetation and Wildlife	X				The project site is disturbed open parkland with mature trees, open meadow and mowed grass. Impacts to natural resources are expected to be negligible.	FEMA site visit dated January 6, 2006	Once the temporary housing need has ended, the site would be seeded and restored to previous conditions to the extent practical and/or used by City Park in a manner consistent with local zoning. This may include a requirement to use native species to re-vegetate the site

Resource Area	Impact Intensity				Impact Summary	Agency Coordination / Permits	Mitigation
	Negligible	Minor	Moderate	Major			
Threatened and Endangered Species (Endangered Species Act, Section 7)	X				Five (5) species are listed as Endangered or Threatened in Orleans Parish. However, no species or appropriate habitat is located within the project area. No impacts anticipated.	USFWS guidance letter dated September 27, 2005. USFWS consultation, "No effect" letter dated 2/6/06.	
Cultural Resources (National Historic Preservation Act, Section 106)		X			There is a potential for archaeological properties to be present within the Area of Potential Effect (APE). In addition, because the APE is situated within a property considered eligible for listing on the NRHP and may adversely affect historic properties, a Standard Phase I Archaeological Survey will be completed to identify potential archaeological properties within the APE. FEMA will address any adverse effects through a Memorandum of Agreement (MOA). See Section F.	Site visit by SHPO 1/6/06 and consultation dated 2/9/06.	A Standard Phase I Archaeological Survey will be completed to identify potential archaeological properties within the APE. FEMA will address any adverse effects through a Memorandum of Agreement (MOA).
Socioeconomics		X			Park occupancy is expected to be about 2,465 people (986 units x estimated 2.5 people per unit) maximum. It is expected the Park residents are currently displaced residents of Orleans or Jefferson Parish. See Section F.		Social services will be provided on the temporary housing sites.
Environmental Justice (Executive Order 12898)		X			FEMA disaster housing assistance is available to any affected household that meets the conditions of eligibility and demographics are not among the eligibility requirements. The proposed action is not expected to pose disproportionately high and adverse public health or environmental effects on minority and low-income populations. See Section F.		
Noise	X				During the construction period residents immediately adjacent to the project site would experience an increase in noise levels. Due to the urgency of the situation, construction would likely occur on a 24-hour schedule until the Park is completed. Construction noise impacts would be short-term and limited to the duration of construction activities. The vehicles from Park occupants would also increase the level of vehicular noise in the area.		If necessary, the following noise reduction measures should be considered: (1) restricting the 24-hour schedule to the first two weeks of construction; (2) using a 7 a.m. to 7 p.m.. construction schedule; (3) completing construction closest to adjoining resident's first; and (4) completing noisier activities during the day if a 24-hour schedule is used.

Resource Area	Impact Intensity				Impact Summary	Agency Coordination / Permits	Mitigation
	Negligible	Minor	Moderate	Major			
Safety and Security	X				Safety fences and signage would be installed around the perimeter of each park as well as around electrical transformers. Security guards would be placed at access points. No concerns anticipated.		Prior to construction, the contractor would be required to post appropriate signage and fencing to minimize potential adverse public safety concerns.
Hazardous Materials and Toxic Wastes		X			<p>A search of hazardous materials databases (Firstsearch, Enviromapper and Gulf Coast Hurricane Laboratory) were queried by FEMA on September 18, 2005.</p> <p>USEPA collected 40 soil samples at City Park in New Orleans to determine the suitability of this location for use as a temporary housing site. LDEQ concurred with USEPA findings and recommendations.</p> <p>The contractor tested for lead and asbestos in two existing buildings proposed for renovation on the proposed Zachary Taylor site. E. P. Mitchell and Associates, Inc. report dated February 1, 2006.</p> <p>Consultation regarding Mitchell report with US Army Corps of Engineers dated February 5, 2006. Electronic information dated February 5th and 6th, 2006. See Section F.</p>	<p>FEMA queried database on September 18, 2005.</p> <p>USEPA test results January 31, 2006.</p> <p>LDEQ consultation February 6, 2006.</p>	The contractor would be required to resolve any contamination issues as recommended by LDEQ and USEPA.
Traffic and Transportation	X				Adverse impacts to motorists would consist of temporary delays and disruptions to normal traffic patterns. Local street widths may need to be reduced temporarily to permit construction adjacent to these roadways. Detour routes may be necessary if local streets need to be temporarily closed for utility relocations or access road construction. Traffic volumes on the local road network in the project area would increase during construction and occupancy. The existing infrastructure would be able to accommodate these increases without impacting local traffic. Existing traffic lights, service roads, interior park roads are serviceable.	Contractor would be required to consult with the Orleans Parish Chief Traffic Engineer.	The three housing sites would have at least two access points for each Park. Traffic volume is expected to increase. Signage will be placed in designated areas in order to alert pedestrians and motorists of project activities and traffic pattern changes

F. Additional Impact Analysis

Cultural Resources

City Park was established in 1854 and was the home of the former Allard Plantation. Significant architecture associated with Neo-Classical revival, Art Deco, and Modern styles is prevalent in the park. Also, of noted significance, are the bridges, buildings, gardens and other landscape features constructed by the Works Progress Administration (WPA) in the late-1930s and early-1940s.

A search of the Louisiana Division of Historic Preservation's files revealed two National Register of Historic Places (NRHP) properties, namely, the New Orleans Carousel and Pavilion and the General Beauregard Equestrian Statue. FEMA, in consultation with the Louisiana State Historic Preservation Office (LA SHPO), has determined that City Park is eligible for listing on the NRHP as a District. Furthermore, there are three NRHP historic districts immediately adjacent to the proposed project area, namely: the South Lakeview Historic District, the Parkview Historic District, and the Esplanade Ridge Historic District.

FEMA conducted a site visit to the proposed project area, performed a record search for previously recorded archaeological sites/surveys, and viewed historic maps on file in the Louisiana Division of Archaeology. There are two previously recorded archaeological sites within the vicinity of the project Area of Potential Effect (APE). These include 16OR25, the reported location of a Native American contact period encampment, which was occupied after the founding of New Orleans, and 16OR73, a historic cistern or well.

FEMA determined that there is a potential for archaeological properties to be present within the APE. In addition, because the APE is situated within a property considered eligible for listing on the NRHP, FEMA finds that the undertaking may adversely affect historic properties. Therefore, a Standard Phase I Archaeological Survey will be conducted to identify potential archaeological properties within the APE. FEMA will address any adverse effects through a Memorandum of Agreement (MOA).

Socioeconomics

A total of 986 units (maximum) would be installed in City Park to house displaced victims of Hurricane Katrina. The total occupancy for all three Parks is expected to be approximately 2,465 people. The expected population at South Festival Park is approximately 1,475 people. The expected population at Zachary Taylor Park is approximately 555 people and the expected population at Marconi Meadows is approximately 435 people.

The City of New Orleans would be able to support the needs of displaced residents by providing public services that are located within close proximity to City Park. The local community would experience an increase in the need for public services (i.e. transportation, schools, fire, police and medical services, and child care). Commercial businesses (grocery stores and restaurants) would also experience an increase in profit during park occupancy. For convenience, social services will be located at the administration buildings provided at each of the three housing sites within City Park.

Environmental Justice

The percent populations of New Orleans are: 67.3%, African American, 28%, White, and 2.3% Asian. The median household income in 1999 was \$27,133 and 23.7% of families are below poverty level. FEMA disaster housing assistance is available to any affected household that meets the conditions of eligibility and demographics are not among the eligibility requirements. Implementation of the proposed action would result in beneficial impacts to displaced residents by providing temporary emergency housing within the general vicinity of their pre-disaster places of residences. The local community would benefit from the restoration of normal life to the community, including normalized employment patterns and commercial transactions.

Hazardous Material and Toxic Waste

The Federal Emergency Management Agency conducted a search of several hazardous material databases on September 18, 2005 to determine the suitability of City Park for use as a group temporary emergency housing site. The hazardous materials were identified in the vicinity of the proposed project sites, but not within the proposed project sites. The database reported two underground storage tanks located at City Park. The tanks are contained and are not leaking. American Can Company, a "Brownfield" site, was identified approximately 0.8 miles southwest of City Park. The term "Brownfield" means the expansion, redevelopment, or reuse of real property which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant. According to the US Environmental Protection Agency (USEPA) database, the Brownfield site has been remediated. An area previously used for disposal of agricultural projects was found 0.28 miles southwest of City Park. This site has also been remediated and is currently developed.

At the request of the Federal Emergency Management Agency, soil samples were collected by the USEPA to determine if the proposed sites were suitable for temporary housing. USEPA collected a total of 40 soil samples in the vicinity of the south golf course and Marconi Meadows on January 22 and 23, 2006. The levels of most of the chemicals detected fell below Louisiana Department of Environmental Quality (LDEQ) Risk Evaluation/Corrective Action Program (RECAP) standards for residential soil. LDEQ developed RECAP to address risks to human health and the environment posed by the release of chemical constituents to the environment. This is LDEQ's primary statutory mandate for remediation activities. It is clear in Louisiana's Environmental Quality Act that risk to human health and the environment must be evaluated in the remedial decision-making process. RECAP uses risk evaluation to: (1) determine if corrective action is necessary for the protection of human health and the environment, and (2) identify constituent levels in impacted media that do not pose unacceptable risks to human health or the environment, (i.e., RECAP Standards).

EPA uses screening levels for an initial comparison of analytical data generated from a sample. The concentrations of chemicals used for screening levels represent the very conservative exposure assumptions and the lower end of the EPA cancer risk range (1 in 1,000,000 excess lifetime cancer risk). Screening levels are used as a tool to indicate whether or not a further evaluation of a particular medium for a chemical is warranted. For example, if chemical concentrations in a sample are below their respective screening levels, no further evaluation is generally necessary. If the results of a sample indicate that some chemical exceeds its respective screening level, it raises a flag the EPA should look into that result further. Exceeding a screening level is not a trigger to take a corrective action; only an indication to look more closely at the area where the sample was taken.

Based on the soil samples collected, USEPA detected low levels of polynuclear aromatic hydrocarbons (PAHs), diesel and oil range organic chemicals, pesticides and metals in the samples. These samples were found on the proposed South Festival Park site (see Table 2 for location, RECAP values and screening levels).

Table 2: Results of USEPA soil test.

Contaminants	South Festival Park	Zachary Taylor	Marconi Meadows	Sample results (ug/kg)	LDEQ RECAP Screening Values (ug/kg)	USEPA Risk Range*
PAH's Benzo(a)pyrene	2	0	0	973 ug/kg 1,070 ug/kg.	330 ug/kg.	1 in 1,000,000 to 1 in 10,000 risk
Benzo (b)fluoranthene	2	0	0	1,710 ug/kg 1,750 ug/kg	620 ug/kg	“
Indeno(1,2,3-cd)pyrene	2	0	0	678 ug/kg and 697 ug/kg.	620 ug/kg.	“
Dieldrin (Pesticide)	2	0	0	46.4 ug/kg and 76.8 ug/kg	30 ug/kg.	1 in 1,000,000 to 1 in 10,000 risk
Arsenic	2	0	0	40 mg/kg 67.5 mg/kg.	12 mg/kg (10)	1 in 10,000 (2)

Although the levels of the PAHs exceed their respective RECAP values, these levels fall within a risk range, of 1 in 1,000,000 to 1 in 10,000 risk of an individual developing cancer over a lifetime from exposure to these concentrations, which EPA has found acceptable in other contexts. The pesticide, dieldrin, was detected in two samples. Although these levels of dieldrin exceed their RECAP value, these levels fall within a risk range, of 1 in 1,000,000 to 1 in 10,000 risk of an individual developing cancer over a lifetime from exposure to these concentrations, which EPA has found acceptable in other contexts.

In ten of the samples, arsenic was detected at levels above the RECAP value of 12 mg/kg. In two of the samples, the concentrations detected exceeded the EPA risk range. Using long-term (i.e., 30 year) residential exposure assumptions, USEPA estimates exposure to an arsenic concentration of 39 mg/kg may pose a 1 in 10,000 excess lifetime cancer risk.

Two existing buildings proposed to be renovated on the Zachary Taylor site were tested by the contractor for lead. The results of the lead test did not exceed LDEQ's RECAP values.

The temporary housing period is not likely to exceed 18 months. At the end of the temporary housing period, City Park would be seeded and restored to its previous condition or used by New Orleans City Park in a manner consistent with local zoning requirements. EPA recommends that the contractor cover the area where arsenic concentrations exceeded EPA's risk range with geotextile fabric and limestone rock to isolate this area. If the area is graded and not isolated, then FEMA would re-sample the areas after the infrastructure and grading for the temporary housing is complete. If the confirmatory re-sampling indicates that arsenic concentrations continue to exceed EPA health based concentrations, USEPA recommends that City Park discusses options with EPA for remediating or isolating the area.

FEMA consulted with the Agency for Toxic Substances and Disease Registry (ATSDR) to inquire about personal protective equipment recommended for the contractor responsible for the LASHPO Phase 1 survey. The ATSDR, is an agency of the U.S. Department of Health and Human Services. Their mission is to serve the public by using the best science, taking responsive public health actions, and providing trusted health information to prevent harmful exposures and disease related to toxic substances. Since the contaminants of concerns are not volatile (evaporate easily) the ATSDR supports the use of dust suppression, engineering controls, adequate personal hygiene, and level D personal protective equipment. Engineering controls, such as dust suppression, are preferred over enhanced protective equipment. If dust suppression cannot be achieved, then respiratory protection is supported

Land Use

There are two issues regarding land use that are currently being evaluated regarding the temporary placement of emergency group housing on City Park land. One involves the State's role and participation in the Land and Water Conservation Fund (LWCF) program and the second involves Act 865, passed by the Louisiana State Legislature in 1982 concerning residential use of the park. FEMA is at this time working with the State to expedite the determination for each in order to facilitate the ability to complete the proposed action. The Land and Water Conservation Fund (LWCF) Act of 1964 is administered by the National Park Service (NPS) and was established to protect federal investments and the quality of assisted resources. The Act established a funding source for both Federal acquisition of park and recreation lands and matching grants to state and local governments for recreation planning, acquisition and development. Throughout the years, City Park has received grants through this program for various park improvements. One of the conditions attached to the funding is that the facility must be maintained for public park and recreation use. In light of the planned temporary housing site, NPS has recommended that the State submit a temporary non-conforming use request for its consideration. NPS has indicated they will expedite their review of the request.

Act 865 was passed by the Louisiana State Legislature in 1982 and contains provisions that restrict usage of City Park. One of the Act's provisions states that the "park shall not be used for residential purposes, except for park employees." At issue is whether this was intended for short-term, temporary use versus long-term residential use. The Louisiana Department of Culture, Recreation and Tourism has been asked to provide an interpretation of the provision at issue.

G. Cumulative Impacts

Cumulative impacts are defined as environmental effects that are greater in magnitude, extent, or duration than the direct and indirect effects of the proposed FEMA-associated action when combined with the effects of other current and future actions, regardless of the proponent. Cumulative impacts will be considered when determining the compatibility of this DEA for specific actions.

H. Public Involvement:

The public comment period for this action will be open from February 13, 2006, to February 27, 2006. Written comments on the Draft EA can be faxed to FEMA's Joint Field Office in Baton Rouge at (225) 346-5848, or sent via email to eacomment@dhs.gov. When responding by email, enter site number **OR10** in the subject field. Verbal comments will be accepted at (225) 376-5137, (215) 376-5398, and TTY for hearing or speech-impaired at 800-462-7585, between 8:00 A.M. and 5:00 P.M. The Draft EA can be viewed and downloaded from FEMA's website at <http://www.fema.gov/ehp/docs.shtm>. It is also available for public review at FEMA Disaster Recovery Centers located at 2128 Franklin Avenue and 219 Loyola Avenue, New Orleans, and the Orleans Parish Library, Nix Branch, located at 1401 S. Carrolltown Avenue, New Orleans. The DRC hours are 9:00 A.M. to 5:00 P.M., Monday through Saturday. If no substantive comments are received, the Draft EA will become final and this initial Public Notice will also serve as the final Public Notice for work in the floodplain in accordance with 44 CFR Part 9.12.

I. Conclusion

FEMA is proposing to construct three temporary emergency housing sites in the City of New Orleans, to provide temporary housing for people displaced by Hurricane Katrina in southeast Louisiana. The numbers of displaced people and applications for individual assistance emphasizes the critical need for emergency housing.

The purpose of this DEA is to minimize the potential for adverse environmental impacts from the proposed action.

Table 1 addresses the requirements of the National Environmental Policy Act, Endangered Species Act, Executive Orders 11988 (Floodplain Management), 11990 (Protection of Wetlands), and 12898 (Environmental Justice), and various hazardous and toxic waste regulations. This DEA provides a mechanism to ensure compliance with applicable local, state and federal environmental laws and regulations, and to support the timely and effective provision of temporary emergency housing. A draft Findings of No Significant Impact was completed on February 13, 2006. Findings of this DEA indicate that impacts to the environment from the proposed action would be negligible and an Environmental Impact Statement is not required.

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J. List of Figures and Tables

Figure 1. Aerial of City Park showing locations of proposed temporary housing parks

Figure 2. Map Quest

Figure 3. USGS Topography Map Quadrangle

Figure 4. City Park Map showing locations of the proposed site

Figure 5. South Festival Proposed Plan View Diagram

Figure 6. Zachary Taylor and Marconi Meadows Proposed Plan View Diagram

Table 1 : Affected Environment and Environmental Consequences Matrix

Table 2: Results of USEPA soil test.

Table 3: USEPA Table of Chemical Definitions

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www.Topozone.com.

Table 3: Definitions of Hazardous Materials:

Polynuclear aromatic hydrocarbons (PAHs)	Commonly found in fuels and crude oil; group of chemicals that are formed during the incomplete burning of coal, oil, gas (through auto exhaust), wood, garbage, or other organic substances, such as tobacco and charbroiled meat; found throughout the environment in the air, water, and soil; not unusual to find in high traffic areas, such as urban area near highways, busy streets. They
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	can occur in the air, either attached to dust particles or as solids in soil or sediment
Benzo(a)pyrene	One of a group of compounds called polycyclic aromatic hydrocarbons (PAHs); not produced or used commercially but are very commonly found since they are formed as a result of incomplete combustion of organic materials.
Benzo(b)fluoranthene	One of a group of compounds called polycyclic aromatic hydrocarbons (PAHs); not produced or used commercially but are very commonly found since they are formed as a result of incomplete combustion of organic materials
Indeno(1,2,3)pyrene	One of a group of compounds called polycyclic aromatic hydrocarbons (PAHs); not produced or used commercially but are very commonly found since they are formed as a result of incomplete combustion of organic materials
Dieldrin	From the 1950s until 1970, aldrin and dieldrin were widely used pesticides for crops like corn and cotton; Dieldrin is everywhere in the environment, but at very low levels; living in homes that were once treated with aldrin or dieldrin to control termites may show higher levels
Arsenic	Naturally occurring element widely distributed in the earth's crust; in the environment, arsenic is combined with oxygen, chlorine, and sulfur to form inorganic arsenic compounds; organic arsenic compounds are used as pesticides, primarily on cotton plants; arsenic occurs naturally in soil and minerals and it therefore may enter the air, water, and land from wind-blown dust and may get into water from runoff and leaching; arsenic cannot be destroyed in the environment; it can only change its form; rain and snow remove arsenic dust particles from the air; many common arsenic compounds can dissolve in water; most of the arsenic in water will ultimately end up in soil or sediment; fish and shellfish can accumulate arsenic; most of this arsenic is in an organic form called arsenobetaine that is much less harmful