

Draft Environmental Assessment
**2097 West Park Phase 2 Group
Housing Site (TR-5)**

FEMA-4611-DR-LA

Schriever, Terrebonne Parish, Louisiana

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FEMA

U.S. Department of Homeland Security
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ACRONYMS AND ABBREVIATIONS

ACS	American Community Survey
APE	Area of Potential Effect
BFE	Base Flood Elevation
BMP	Best Management Practices
CAP	Corrective Action Plan
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CFR	Code of Federal Regulations
CUP	Coastal Use Permit
CWA	Clean Water Act
CZMA	Coastal Zone Management Act
EA	Environmental Assessment
EDMS	Electronic Document Management System
EIS	Environmental Impact Statement
EO	Executive Order
EPA	United States Environmental Protection Agency
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FONSI	Finding of No Significant Impact
FPPA	Farmland Protection Policy Act
GOHSEP	Governor's Office of Homeland Security and Emergency Preparedness
GSA	General Services Administration
HMA	Hazard Mitigation Assistance
IA	Individual Assistance
IHP	Individuals and Households Program
LCRP	Louisiana Coastal Resources Program
LDEQ	Louisiana Department of Environmental Quality
LDNR	Louisiana Department of Natural Resources
LDOTD	Louisiana Department of Transportation and Development
LPDES	Louisiana Pollutant Discharge Elimination System
MHU	Manufactured Housing Unit
MLR	Multi-Family Lease and Repair Program
MSA	Magnuson-Stevens Fishery Conservation and Management Act
NCS	Non-Congregate Sheltering
NEPA	National Environmental Policy Act
NFA	No Further Action
NFA-ATT	No Further Action at This Time
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service
NOAA	National Oceanic Atmospheric Administration
NPL	National Priorities List
NPDES	National Pollution Discharge Elimination System
NRHP	National Register of Historic Places
NRCS	National Resources Conservation Service
NWI	National Wetlands Inventory

OCM	Office of Coastal Management
OSHA	Occupational Safety and Health Administration
P&A	Plugged and Abandoned
PA	Public Assistance
RCRA	Resource Conservation and Recovery Act
SDWA	Safe Drinking Water Act
SEMS	Superfund Enterprise Management System
SFHA	Special Flood Hazard Area
SHPO	State Historic Preservation Office
SSA	Sole Source Aquifer
SWPPP	Storm Water Pollution Prevention Plan
TDML	Total Daily Maximum Load
TSCA	Toxic Substances Control Act
TTHU	Transportable Temporary Housing Unit
UFAS	Uniform Federal Accessibility Standard
USACE	United States Army Corps of Engineers
USCB	United States Census Bureau
USFWS	United States Fish and Wildlife Service
UST	Underground Storage Tank
USTD	Underground Storage Tank Division

1.0 INTRODUCTION

The President of the United States issued a Major Disaster Declaration for Hurricane Ida (DR-4611-LA) on August 29, 2021 and amended September 7, 2021 and September 13, 2021. This Declaration authorized the Department of Homeland Security's Federal Emergency Management Agency (FEMA) to provide federal assistance under Section 408 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, Public Law No. 93-288, as amended (Stafford Act) in designated areas of Louisiana impacted by the hurricanes. Under this authority FEMA may provide direct temporary housing when there is a lack of available housing resources for eligible disaster victims whose homes are uninhabitable or destroyed as a result of the declared event.

To provide temporary housing solutions for survivors of Hurricane Ida, the State of Louisiana (recipient and applicant) requested assistance from FEMA in the form of Direct Temporary Housing (Direct Housing or Housing Assistance) through the Individuals and Households Program (IHP) for DR-4611-LA. FEMA authorized Housing Assistance for a period of up to 18 months for the following parishes for Hurricane Ida: Jefferson, Lafourche, Livingston, Plaquemines, St. Charles, St. Helena, St. James, St. John the Baptist, Tangipahoa and Terrebonne, and holding the remaining fifteen (15) parishes in abeyance until further data becomes available. FEMA's Direct Housing involves a variety of temporary housing solutions, including Group Housing, the Multi-Family Lease and Repair Program (MLR), Direct Lease, Transportable Temporary Housing Units (TTHUs). If existing private residential or commercial lots do not meet the need for TTHU placement, FEMA may construct group housing sites on undeveloped land to include build out of TTHU pads, ingress, egress, and utility connections.

This Environmental Assessment (EA) has been prepared in accordance with the National Environmental Policy Act (NEPA) of 1969, the President's Council on Environmental Quality regulations to implement NEPA (40 CFR Parts 1500-1508), and FEMA's procedures for implementing NEPA (FEMA Instruction 108-1-1). FEMA is required to consider potential environmental impacts before funding or approving actions and projects. This EA will analyze the potential environmental impacts of the proposed temporary group housing, 2097 West Park Phase 2 Group Housing Site, as part of an expedited review process. 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).

2.0 PURPOSE AND NEED

Catastrophic damage from severe storms and flooding resulted in an extraordinary demand for housing assistance in communities within the parishes of Jefferson, Lafourche, Livingston, Plaquemines, St. Charles, St. Helena, St. James, St. John the Baptist, Tangipahoa and Terrebonne.. FEMA's standard housing solutions such as MLR, NCS, Direct Lease, and individual TTHUs placed on the private lot of individual survivors, or grouped onto commercial sites equipped to support them, while critical to the success of the housing mission, cannot meet the entirety of the need within the parishes of Jefferson, Lafourche, Livingston, Plaquemines, St. Charles, St. Helena,

St. James, St. John the Baptist, Tangipahoa and Terrebonne. To address the gap in housing assistance, the Stafford Act Section 408 and 44 CFR § 206.117 provides housing assistance to eligible individuals and households who have been devastated by a major disaster or emergency. FEMA intends to pursue the development of TTHU Group Sites on previously undeveloped land or undeveloped lots for DR-4611-LA.

Providing housing resources for survivors of Hurricane Ida is a priority of FEMA's recovery mission. As of February 24, 2022, based on applicant call outs, FEMA estimates that approximately 1,976 households will require direct temporary housing assistance in Terrebonne Parish. While approximately half of this need has been met with private and commercial sites, there remains a need for 915 additional MHU units.

While the Direct Housing Task Force is also actively soliciting properties for Direct Lease and MLR, FEMA anticipates very few properties will be available. The low number of feasible private and commercial sites, MLR, and Direct Lease properties, is insufficient to meet the need for direct temporary housing in Terrebonne Parish. The decision to develop Group Sites is made only after all other housing solutions have been exhausted and the housing needs remain. The development of the 2097 West Park Group Site would alleviate the need for approximately 203 housing units in Terrebonne Parish.

3.0 ENVIRONMENTAL REVIEW PROCESS

In order to meet the urgent needs of disaster survivors requiring temporary housing, FEMA has implemented an expedited environmental review process. The purpose of this document is to assist FEMA in fulfilling its environmental review responsibilities under NEPA and to serve as a vehicle to document compliance under other applicable environmental and historic laws and orders. Laws and orders addressed through this EA include: the Clean Air Act; Clean Water Act (CWA); Endangered Species Act; National Historic Preservation Act (NHPA); Executive Order (EO) 11988 (Floodplain Management); EO 11990 (Protection of Wetlands); EO 12898 (Environmental Justice); Comprehensive Environmental Response, Compensation and Liability Act (CERCLA); Resource Conservation and Recovery Act (RCRA); and Farmland Protection Policy Act (FPPA). Agency coordination/consultation is being conducted on a site by site basis as necessary.

The scope of FEMA's environmental review includes evaluating project alternatives, characterizing the affected environment, identifying potential environmental impacts, and outlining ways to avoid, reduce or minimize adverse effects. This EA examines the site-specific environmental impacts associated with building a proposed FEMA group-housing site on private or publicly owned land to be leased by the General Services Administration (GSA) for this purpose. This EA was prepared based on a site evaluation, document research, and resource agency information.

4.0 SITE SELECTION PROCESS AND ALTERNATIVES

NEPA requires investigation and evaluation of reasonable project alternatives as part of the project environmental review process. At a minimum, FEMA's NEPA implementing regulations require that the No Action and Proposed Action be evaluated. In order to expedite the group housing site selection process, FEMA is working closely with local officials and the United States Army Corps of Engineers (USACE) to identify potential sites, followed by site reconnaissance and research to determine site suitability. Important factors considered in choosing a site include: demand for temporary housing in that area, group acceptance, proximity of group services/amenities (schools, healthcare facilities, public transportation, etc.), engineering and construction feasibility, access to utilities, land use compatibilities, property owner terms, costs to develop and maintain the site, and environmental/cultural resource sensitivities. FEMA will continue to evaluate alternative sites in Terrebonne Parish. The 2097 West Park Phase 2 Group Site was selected for further detailed analysis because it meets the basic site feasibility and selection criteria.

Alternative 1 – No Action Alternative

Under the No Action Alternative, FEMA would not develop a temporary group housing site at this location. Displaced residents would continue to stay with relatives/friends, in hotels, or in other temporary locations until they resolve their own long-term housing needs. This alternative may jeopardize public health, safety, and well-being and does not meet the purpose and need, but will continue to be evaluated throughout this EA and serve as a baseline comparison of impacts from other action alternatives. The future environmental condition of the site would be at the discretion of the property owner.

Alternative 2 – Develop the 2097 West Park Phase 2 Group Site with MHUs (Proposed Action)

The Proposed Action would provide temporary housing for eligible disaster survivors displaced by flooding. Disaster survivors would be temporarily relocated to the site with an expected occupancy up to 18 months (which includes a site deactivation period) while they resolve their permanent housing needs. This alternative would assist in fulfilling FEMA's mandate under the Individuals and Households Program (IHP) to expeditiously provide temporary housing for eligible disaster survivors. This alternative would also address the proposed project's purpose and need as it satisfies the housing needs for those survivors for whom other types of direct housing options are not available.

4.1 Project Site and Location Description

The project site is located at 2097 West Park Avenue, Schriever, Louisiana 70607 (Latitude: 29.727634, Longitude: -90.788928). Figure 1 is an aerial photo depicting the boundaries of the project site and adjacent area. The site is located east of the Schriever Elementary School and St. Bridget's Church and south of Waterplant Road. Approximately 35 acres of the 36.6-acre property would be developed. The site consists of cultivated field and is segmented by a jurisdictional unnamed stream. A small single-family-dwelling residential neighborhood and a water treatment plant are adjacent to the north and cultivated fields are adjacent to the south. A mobile home park

(Lulu's Mobile Home Park) is located 0.9 miles to the southeast and a Chevron facility is located 0.6 to the south. A residential area is located 1.3 miles to the west. Highway 24 (LA-24), divided into West Park Avenue and West Main Street, is to the west of the site. The site slopes slightly from the west (elev. 10) down towards the east (elev. 6). Approximately 203 modular housing units (MHUs) would be placed in the proposed footprint to be used as temporary group housing. The majority of the 36.6-acre site is within Zone X, area of minimal flood hazard.

4.2 Proposed Action Description

The Proposed Action would utilize the project site and design to contract for the construction of approximately 203 manufactured housing unit pads, green space, and all necessary support facilities (Figure 2). These pads would be used for the placement of MHUs to house displaced families. Development of the site would require the installation of utilities, the placement of gravel for roads, trailer pads and resident parking, site lighting, and concrete for handicap parking areas.

The following specific site development components would be included with this project:

- Site preparation would include clearing, grading, and removal of woody vegetation and debris.
- A culvert and associated fill will be used in a jurisdictional unnamed stream to tie both portions of the Phase 2 site.
- Infrastructure for water and electrical services exist off Waterplant Road but would have to be extended onto the site.
- Infrastructure for sewer would consist of a packaged sewage treatment plant on site.
- New lines and fire hydrants, as required, would be installed on the property.
- Storm water drainage would be developed within the site.
- Site features include approximately 15% of the units meeting Uniform Federal Accessibility Standard (UFAS), and 100% of on-site essential services/facilities (such as mailbox kiosk) would be UFAS compatible.
- Erosion control would be established during the construction period and a perimeter fence would be constructed around the project site.

FEMA would operate and maintain the site during the term of occupancy. When the temporary housing need has ended, FEMA expects that the MHUs would be hauled from the site and returned to a FEMA storage facility. The project site would be reasonably restored to its previous condition and then seeded or left per the lease terms with the landowner.

5.0 AFFECTED ENVIRONMENT AND POTENTIAL IMPACTS

This section is organized by individual resources. It includes a description of the existing conditions at the project area and provides an analysis of potential environmental impacts for each alternative. Impacts to the following resources as a result of the Proposed Action were found to be discountable and are not evaluated further in this EA: geology, seismicity, air quality, climate change, wildlife and fish, noise, public service and utilities, and public health and safety. Where potential impacts exist, conditions or mitigation measures to offset these impacts are detailed. Table 3 summarizes the results of the environmental review process. No safety issues were identified on the project site.

5.1 Soils

In 1981 Congress passed the Agriculture and Food Act of 1981 (P.L. 97-98) containing the Farmland Protection Policy Act (FPPA) subtitle I of Title XV, Section 1539-1549. The final rules and regulations were published in the Federal Register on June 17, 1994. The FPPA is intended to minimize the impact Federal programs have on the unnecessary and irreversible conversion of farmland to nonagricultural uses. It ensures that to the extent possible, Federal programs are administered to be compatible with state and local units of government, as well as private programs and policies to protect farmland. The FPPA does not authorize the federal government to regulate the use of private or non-federal land or in any way affect the property rights of owners. As detailed in the FPPA, farmland includes prime farmland, unique farmland, and land of statewide or local importance. Farmland subject to FPPA requirements does not have to be currently used for cropland. It can be forest land, pastureland, cropland, or other land, but not water or urban built-up land.

The USDA soil survey map accessed on January 31, 2022, shows this proposed group site as approximately 36.6 acres of prime farmland. The USDA soil survey shows Cancienne silt loam soil, Cancienne silty clay loam, and Schriever clay.

Alternative 1- No Action Alternative

The No Action Alternative would not entail any construction activities; therefore, no adverse impacts to soils would occur as a result of no federal actions.

Alternative 2 - Develop the 2097 West Park Phase 2 Group Site with MHUs (Proposed Action)

The soils at the 2097 West Park Phase 2 Group Site are considered prime farmland. FEMA completed the Site Assessment Criteria (Part VI) of the National Resources Conservation Service (NRCS) AD 1006 Farmland Impact Conversion Rating form by utilizing criteria explained in 7 CFR § 658.5(b). FEMA's Total Site Assessment points (Part VI in the AD 1006 Form) of 38 is based on the following categories: Area in Non-urban Use (10 out of 15); Perimeter in Non-urban Use (5 out of 10); Percent of Site Being Farmed (20 out of 20); Protection Provided by State and Local Government. (0 out of 20); Distance from Urban Build-up Area (0 out of 15); Distance to Urban Support Services (0 out of 15); Size of Present Farmland Unit Compared to Average (0 out

of 10); Creation of Non-farmable Farmland (0 out of 10); Availability of Farm Support Services (0 out of 5); On-Farm Investments (3 out of 20); Effects of Conversion on Farm Support Services (0 out of 10); and Compatibility with Existing Agricultural Use (0 out of 10). Total Site Assessment points (Part VI in the AD 1006 Form) less than 60 indicates a site need not be given further consideration for FPPA protection (per 7 CFR § 658.4(c)(3)).

Therefore, although approximately 36.6 acres of prime farmlands soils would be permanently impacted, this impact is considered minor due to the vast amounts of the same and similar soils throughout Terrebonne Parish. The Proposed Action must comply with the mitigation measures discussed in Section 7 of this EA to address requirements of the Louisiana Department of Environmental Quality (LDEQ) to observe precautions to control nonpoint source pollution, reduce erosion, and develop a Storm Water Pollution Prevention Plan (SWPPP) and implement the required conditions.

5.2 Water Resources

This section provides an overview of the affected area and potential environmental effects of the No Action and Proposed Action Alternatives on water resources, including water quality, streams, wetlands, and floodplains.

5.2.1 Water Quality

Section 401 of the CWA requires state certification of all Federal licenses and permits in which there is a “discharge of fill material into navigable waters.” The certification process is used to determine whether an activity, as described in the Federal license or permit, would impact established site-specific water quality standards. A water quality certification from the issuing state, the LDEQ in this case, is required prior to the issuance of the relevant Federal license or permit. The most common Federal license or permit requiring certification is the USACE CWA Section 404 permit.

The National Pollutant Discharge Elimination System (NPDES) was created by Section 402 of the CWA. This program authorizes the United States Environmental Protection Agency (EPA) to issue permits for the point-source discharge of pollutants into waters of the United States (U.S.) Through a 2004 Memorandum of Agreement, the EPA delegated its permit program for the State of Louisiana to LDEQ. The ensuing Louisiana Pollutant Discharge Elimination System (LPDES) program authorizes individual permits, general permits, storm water permits, and pretreatment activities that result in discharges to jurisdictional waters of the state.

Impaired Waterbodies

Impaired waterbodies and streams are on the CWA 303(d) list and are required to develop a total maximum daily load (TMDL). TMDLs are maximum amounts of pollutants that can be released in a waterbody or stream without causing the water to become impaired (violate state water quality standards). TMDLs for Dissolved Oxygen, Fecal Coliform, and Non-Native Aquatic Plants have

been established for these streams, which flow into the Intercoastal Waterway. TMDL requirements are established in NPDES permits and through Best Management Practices (BMPs). BMPs are types of activities that are created to control or minimize pollutants from an area to water bodies of the state.

Alternative 1- No Action Alternative

The No Action Alternative would have no impact on water quality would occur as a result of no federal actions.

Alternative 2 - Develop the 2097 West Park Phase 2 Group Site with MHUs (Proposed Action)

Under the Proposed Action Alternative, impacts to water quality, if any, would be minor. Appropriate BMPs will be implemented during site development to minimize sediment migration from the site into nearby water bodies. Surface runoff will be controlled by using siltation controls such as silt fencing around the construction site to minimize erosion of materials into adjacent wetlands and/or waterways. Any disturbed soil will be protected with seed or sod after construction in order to decrease the amount of soil eroded by rainfall and runoff. Any fill stored on site will be appropriately covered to prevent erosion.

Discharges of gray water will be made directly into St. Louis Bayou via effluent pipe. LAG 570000 General Permit has been obtained for the discharge of sanitary wastewater. Based on the levels of permitting, the maximum level of discharge would not exceed 100,000 gallons per day.

In accordance with Section 401 and 402 of the CWA and the Louisiana Clean Water Code, coverage under the LPDES Storm Water General Permit for Large Construction Activities (greater than 5 acres) will be obtained for 2097 West Park Phase 2 Group Site construction activities. Coverage under the LPDES Storm Water General Permit for Large Construction Activities will implement a SWPPP that will meet the requirements of approved TMDLs for St. Louis Bayou.

Contractors will comply with state and federal regulations for the point source pollutants created by packaging plants into surface water to also include existing streams.

The 2097 West Park Phase 2 Group Housing Site is located within 5 miles of St. Louis Bayou, Bayou Terrebonne, Ouski Bayou, Bayou Blue, and Bayou Lafourche, five impaired waters, which is a waterbody or stream that is too polluted or otherwise degraded to meet the water quality standards set by states, territories, or authorized tribes. These actions would prevent any degradation of water quality from the construction and operational discharges. The Proposed Action Alternative would have no significant impacts to water quality in the area of the site.

5.2.2 Wetlands

The CWA and EO 11990 define wetlands as “those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal

circumstances do support, a prevalence of vegetation typically adapted for life in saturated conditions. Wetlands generally include swamps, marshes, bogs, and similar areas.”

This section also addresses regulated streams (non-wetland waters) that are subject to jurisdiction under Section 404 of the Clean Water Act.

The 2097 West Park Phase 2 Group Site is in agricultural production and active farms are located on the north and south side of the proposed project.

By letter dated January 26, 2022, the USACE did not identify any regulated wetlands on the proposed group site (See Attachment 1). However, per the National Wetland Inventory map, a regulated unnamed stream bisects the Phase 2 property and is classified as intermittent riverine habitat (See Attachment 2).

Alternative 1- No Action Alternative

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.

Alternative 2 – Develop the 2097 West Park Phase 2 Group Site with MHUs (Proposed Action)

The portion of the West Park Phase 2 site that contains regulated waters of the US will be placed in a culvert based on the conceptual site plan. This proposed action will involve temporary impacts to and loss of aquatic habitat. However, adherence to the USACE nationwide and State permit conditions will minimize these impacts to an acceptable level. These conditions state that culverts “shall accommodate 100-year flood design flow frequency and be installed at a sufficient depth to maintain low flows to sustain the movement of aquatic species”.

In a pre-construction notification the USACE have indicated that a shallow ditch on site is jurisdictional and will require a Department of the Army (DA) Nationwide Permit #14 for a proposed road crossing that is required to facilitate access to both sides of the site (See Attachment 3).

FEMA is requesting application of Nationwide Permit #14 for the installation of a 36 inch culvert by approximately 90 linear feet. Approximately 70 cubic yards of material will be placed below the ordinary high-water mark for the culvert crossing.

NWP #14 is issued for Linear Transportation Projects involving the construction, expansion, modification, or improvement of linear transportation projects (e.g., roads, highways, railways, trails, airport runways, and taxiways) in waters of the United States and limits the amount of fill below ordinary high water to ½ acre of non-tidal and non-navigable waters of the U.S. This permit is only required for construction of the culvert within the USACE regulated feature but is not anticipated to impact the wetlands.

FEMA has determined that there is no practicable alternative to the stream crossing for site development.

5.2.3 Ground Water

A Sole Source Aquifer (SSA) is an underground water source that has been designated by the EPA as the sole or principal source of drinking water for an area. By definition, SSA is an aquifer that supplies at least 50% of the drinking water consumed in the area overlying the aquifer.

The SSA Program is authorized by Section 1424(e) of the Safe Drinking Water Act (SDWA) of 1974. Designation of an aquifer as a SSA provides EPA with the authority to review federal financially assisted projects planned for the area to determine their potential for contaminating the aquifer. This provides essential groundwater protection to ensure the storage, handling, or use of fertilizers, pesticides, or hazardous products do not pollute an SSA.

Federally funded projects reviewed by EPA under the SSA Program may include, but are not limited to, highway improvements and new road construction, public water supply wells, transmission lines, wastewater treatment facilities, construction projects involving disposal of storm water, and agricultural projects involving management of animal waste.

Alternative 1- No Action Alternative

No impacts to groundwater would occur as a result of no federal actions.

Alternative 2 - Develop the 2097 West Park Phase 2 Group Site with MHUs (Proposed Action)

Website <https://www.epa.gov/dwssa/map-sole-source-aquifer-locations> was accessed on February 2, 2022. There are no identified sole source aquifers in the project area.

All reported groundwater in Terrebonne Parish comes from the Mississippi River alluvial aquifer system. The Mississippi River alluvial aquifer contains saltwater throughout Terrebonne Parish. It is composed of fine to medium sand at the top of the aquifer, which grades to coarse sand and gravel in the lower part. Overlying the alluvial aquifer is a clayey surface. The base of the aquifer ranges from 50 to 450 feet. The aquifer discharges into rivers, canals, and lakes, and is also withdrawn by wells. The aquifer receives recharge from the Mississippi River on a seasonal basis and is also recharged by infiltration of rainfall, as well as vertical leakage from the underlying aquifers.

The primary sources of fresh water in Terrebonne Parish are the Gulf Intracoastal Waterway and Bayou Lafource, which is supplied with water from the Mississippi River at Donaldsonville, LA. In 2010, Gulf Intracoastal Waterway and Bayou Lafource accounted for about 87 percent of the Terrebonne Parish water supply.

Under the Proposed Action Alternative, construction activities are not anticipated to directly impact groundwater. The depth of excavation and grading at the 2097 West Park Phase 2 Group Site would not exceed a maximum of seven (7) feet for a gravity sewer and would otherwise be limited to the least extent necessary to facilitate construction and to comply with building code requirements. This depth for utilities is relatively shallow and unlikely to impact ground water resources. Possible sources of groundwater contamination associated with site construction and Group Site operations would be mitigated by appropriate BMPs (See Section 7 for BMPs).

5.2.4 Floodplains

EO 11988, Floodplain Management, requires Federal agencies to avoid to the extent possible the long- and short-term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct or indirect support of floodplain development wherever 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.

Alternative 1- No Action Alternative

Under the No Action Alternative, there would be no short- or long-term impacts to floodplains as a result of no federal actions.

Alternative 2 - Develop the 2097 West Park Phase 2 Group Site with MHUs (Proposed Action)

Based on the FEMA Flood Insurance Rate Map (FIRM) panel number 22109C011E dated June 6, 2021, accessed on January 22, 2022, at (<https://msc.fema.gov/portal/home>), the proposed project is located in a Zone X, which is outside the special flood hazard area.

The portion of the West Park Phase 2 site that contains regulated waters of the US will be placed in a culvert based on the initial site plan. This proposed action will involve temporary impacts to and loss of aquatic habitat. Adherence to the USACE nationwide and State permit conditions will minimize these impacts to an acceptable level. Per the terms of the permit, culverts "shall accommodate 100-year flood design flow frequency and be installed at a sufficient depth to maintain low flows to sustain the movement of aquatic species".

FEMA is requesting a Nationwide Permit #14 for the installation of a 36 inch culvert by approximately 90 linear feet to access an adjoining property. Approximately 70 cubic yards of material will be placed below the ordinary high-water mark for the culvert crossing.

The drainage crossing will be designed to accommodate 100-yr flood frequency and the action would not adversely affect floodplain values.

5.3 Coastal Zone Management

The Coastal Zone Management Act (CZMA) (P.L. 92-583, as amended; 16 U.S.C. Section 1451-1464) encourages the management of coastal zone areas and provides grants to be used in maintaining these areas. It requires that Federal agencies be consistent in enforcing the policies of state coastal zone management programs when conducting or supporting activities that affect a coastal zone. This is intended to ensure that Federal activities are consistent with state programs for the protection and, where possible, enhancement of the nation's coastal zones. The Act's definition of a coastal zone includes coastal waters extending to the outer limit of state submerged land title and ownership, adjacent shorelines, and land extending inward to the extent necessary to control shorelines. A coastal zone includes islands, beaches, transitional and intertidal areas, and salt marshes.

The CZMA requires that coastal states develop a State Coastal Zone Management Plan or program and that any Federal agency conducting or supporting activities affecting the coastal zone conduct or support those activities in a manner consistent with the approved state plan or program. To comply with the CZMA, a Federal agency must identify activities that would affect the coastal zone, including development projects, and must review the State Coastal Zone Management Plan to determine whether a proposed activity would be consistent with the plan.

Pursuant to the CZMA, the State and Local Coastal Resources Management Act of 1978 (LA Revised Statute [R.S.] 49:214:21 et seq. Act 1978, No. 361) is the state of Louisiana's legislation creating the Louisiana Coastal Resources Program (LCRP). The LCRP establishes policy for activities including construction in the coastal zone, defines and updates the coastal zone boundary, and creates regulatory processes. The LCRP is under the authority of the LDNR Office of Coastal Management (OCM). If a proposed action is within the coastal zone boundary, OCM will review the eligibility of the project prior to its review from other Federal agencies (USACE, USFWS, and National Marine Fisheries Service [NMFS]). The mechanism used to review these projects is the Coastal Use Permit (CUP). Per the CZMA, all proposed Federal projects within the coastal zone must undergo a "Consistency Determination" by OCM for that project's consistency with the state's Coastal Resource Program (i.e., LCRP).

Alternative 1- No Action Alternative

The No Action Alternative would entail no activity and, therefore, would have no impact on the coastal zone as a result of no federal actions.

Alternative 2 - Develop the 2097 West Park Phase 2 Group Site with MHUs (Proposed Action)

The Proposed Action Alternative would involve construction in a designated coastal zone. The Office of Coastal Management (OCM) determined in a letter dated September 28, 2012, that all Federal financial assistance (emergency or not) is fully consistent with the Louisiana Coastal Resources Program. FEMA submitted a Consistency Determination letter to the OCM dated September 29, 2021, that indicated project(s) in the following Individual Assistance (IA) designated parishes: Jefferson, Lafourche, Livingston, Plaquemines, St. Charles, St. Helena, St. James, St. John the Baptist, Tangipahoa, and Terrebonne Parish will not affect any coastal uses or resources in accordance with 15 CFR 930.36. In a OCM response letter dated September 29, 2021 (Consistency number C20210142), the OCM concurred with FEMA's negative determination, as described by National Oceanic and Atmospheric Administration (NOAA) regulations on federal consistency at 15 CFR § 930 (See Attachment 4).

5.4 Threatened and Endangered Species and Critical Habitat

Section 7 of the Endangered Species Act of 1973 directs Federal agencies to utilize their authorities in furtherance of the purposes of the Act by carrying out programs for the conservation of listed species or designated critical habitats. The USFWS and the U.S. National Oceanic Atmospheric Administration (NOAA) are the agencies referred to as the "Services" that regulate compliance with the Endangered Species Act. The Magnuson-Stevens Fishery Conservation and Management

Act (MSA) governs fisheries management for up to 200 miles offshore (the U.S. Exclusive Economic Zone). The NMFS is a part of NOAA and is responsible for implementing the MSA to ensure that U.S. fisheries comply with a wide range of conservation and management requirements.

Migratory birds are protected by the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA). Any activity that results in the take of migratory birds or eagles is prohibited unless authorized by the USFWS. There are no provisions for allowing the take of migratory birds that are unintentionally killed or injured. Any person or organization who plans or conducts activities that may result in the take of migratory birds is responsible in complying with the appropriate regulations and implementing appropriate conservation measures.

Table 1: Federally Listed Species Known to Occur in Terrebonne Parish

Common Name (Scientific Name)	Federal Status	Habitat	Potential to Occur within Project Area
West Indian Manatee (<i>Trichechus manatus</i>)	Threatened	Found in marine, estuarine, and freshwater environments with a strong preference for warm and well-vegetated waters.	No; there is no suitable habitat is present within the project area.

Alternative 1- No Action Alternative

Under the No Action Alternative, no project would be constructed; therefore, no impacts on species federally listed as threatened or endangered, or federally listed critical habitats would occur as a result of no federal actions.

Alternative 2 - Develop the 2097 West Park Phase 2 Group Site with MHUs (Proposed Action)

There is one Federally listed species, the West Indian Manatee, with the potential to occur in Terrebonne Parish, Louisiana (see Table 1); however, this species does not have the potential to occur within the 2097 West Park Phase 2 Group Site project area. Per USFWS Information for Planning and Consultation (IPaC) website, there are no critical habitat for this species within the project area.

Inspection of the proposed site did not indicate the presence of any species federally listed as threatened or endangered. The USFWS's IPaC website (<https://ecos.fws.gov/ipac/>), accessed on January 21, 2022, was reviewed for a list of threatened and endangered species in the project area. While this listed species can occur in Terrebonne Parish, the proposed group housing site does not contain suitable habitat.

A search of the USFWS Critical Habitat online mapper and ArcGIS Map on January 21, 2022 resulted in a finding of no designated critical habitats in the project area. The following webpages were reviewed for critical habitats in the project area:

- <https://ecos.fws.gov/ecp/report/table/critical-habitat.html>
- <https://fws.maps.arcgis.com/home/index.html>

Based on the scope of work and lack of suitable habitat at the project site, FEMA has made the determination that the Proposed Action Alternative would have no effect on federally listed species and have no effect on critical habitat.

5.5 Cultural Resources

The consideration of impacts to historic and cultural resources is mandated under Section 101(b)(4) of NEPA as implemented by 40 CFR Parts 1501-1508. In addition, providing Direct Temporary Housing Assistance in the form of constructing TTHU Group Sites meets the definition of a Federal Undertaking pursuant to Title 36 Code of Federal Regulations Part 800. Accordingly, FEMA is required to comply with Section 106 of the National Historic Preservation Act (NHPA). FEMA is initiating Section 106 review for the Undertaking in accordance with the Programmatic Agreement between FEMA, the Louisiana State Historic Preservation Officer (SHPO), the Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP), and Participating Tribes, executed on December 21, 2016, as amended (Agreement). Due to the emergency need to find safe housing locations for the many survivors, FEMA is consulting per 36 CFR § 800.12(d) and Stipulation II.B.2 of the Agreement regarding Expedited Review for Emergency Undertakings.

Alternative 1- No Action Alternative

Under the No Action Alternative, there would be no impacts to historic properties as a result of no federal actions.

Alternative 2 - Develop the 2097 West Park Phase 2 Group Site with MHUs (Proposed Action)

FEMA has determined that the Area of Potential Effects (APE) for the proposed Undertaking to include a three-quarter mile viewshed from the center of the proposed group site and the footprint of the group site including access roads for direct effects related to the proposed work.

During the week of February 9, 2022, FEMA Historic Preservation Specialists consulted the Louisiana Office of Cultural Development's Cultural Resources National Register database, the Louisiana Cultural Resources Map and associated site files (LDOA website), the US Department of Agriculture Web Soil Survey maps (USDA Website), various digital archival resources, photos, historic maps, and FEMA's internal files to identify the presence of historic properties within the APE. FEMA has determined that there are no historic properties in the APE as defined in 36 CFR 800.16(l). Based on the above identification and evaluation efforts, archaeological deposits are not likely to be present within the proposed group site footprint due to land use, nearby development, and previous survey results. In addition, avoidance measures have been implemented to remove housing units from being installed where ground disturbance may have the potential to encounter

archaeological resources. Therefore, FEMA has determined a finding of No Historic Properties Affected in accordance with Stipulation II.C.4 of the 2016 Statewide PA. FEMA would condition its approval of the group site on the following:

If during the course of work, archaeological artifacts (prehistoric or historic) are discovered, the Contractor shall stop work in the vicinity of the discovery and take all reasonable measures to avoid or minimize harm to the finds. The Contractor shall inform their Individual Assistance (IA) contacts at FEMA, who will in turn contact FEMA Historic Preservation (HP) staff. The Contractor will not proceed with work until FEMA HP completes consultation with the SHPO, and others as appropriate.

On February 23, 2022 a letter was sent to the SHPO for Section 106 consultation regarding the Undertaking (see Attachment 5). The same consultation letter was also sent to Participating Tribal Nations. SHPO concurrence was received February 24, 2022. The Five (5) Tribal Nations (Coushatta Tribe of LA, Eastern Shawnee of Oklahoma, Jena Band of Choctaw Indians, Mississippi Band of Choctaw Indians, and the Tunica-Biloxi Tribe of LA) did not provide a response during the 7-day comment period. As such, FEMA may proceed with the Undertaking.

5.6 Socioeconomic Resources

The project site is located in Terrebonne Parish, Louisiana. According to the United States Census Bureau (USCB), the population as of April, 2020 was 109,580 with a total of 45,766 households. The median household income was estimated at approximately \$48,747 (based on 2019 USCB Estimates). According to the 2019 USCB Estimates, approximately 15.7% of population lives below poverty levels.

The population within the Terrebonne Parish, Louisiana, is comprised of about 70.7% Caucasian, 19.2% African American, 1.1% Asian, 5.1% Hispanic, 6.2% American Indian and Alaska Native alone, 0.1% Native Hawaiian and Other Pacific Islander alone, and 2.7% Two or more races. The demographic makeup of the group site residents is expected to be similar to the community as a whole (Table 2).

Table 2: Project Population Data¹

Area	Population ²	White (Caucasian) Alone	Black or African American Alone	Asian Alone	Hispanic or Latino	American Indian and Alaska Native Alone	Native Hawaiian and Other Pacific Islander Alone	Two or More Races	Poverty Rate ³	Households	Median Household Income ⁴
Schriever, Louisiana	6,711	60.5%	28.0%	2.3%	7%	3.3%	0.0%	2.0%	22.1%	2,584	\$35,528
Terrebonne Parish	109,580	70.7%	19.2%	1.1%	5.1%	6.2%	0.1%	2.7%	15.7%	39,972	\$48,747
Louisiana	4,648,794	62.8%	32.8%	1.8%	5.3%	0.8%	0.1%	1.8%	19.0%	1,736,021	\$49,469

¹ Data Source, USCB 2019 American Community Survey (ACS), 5-year estimates. Estimates are not comparable to other geographic levels due to methodology differences that may exist between different data sources

² USCB ACS, Vintage 2019 Population Estimates, July 1, 2019

³ USCB 2019 ACS, 1-year estimates. Estimates are not comparable to other geographic levels of poverty estimates.

⁴ USCB ACS, Median Household Income (in 2019 dollars) and Households, 2015-2019

5.6.1 Environmental Justice

EO 12898, entitled “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 their programs, policies, and activities on minority and/or low-income populations.

Alternative 1- No Action Alternative

The No Action Alternative would preclude the federal government from adequately addressing the urgency of providing temporary and transient emergency housing. Consequently, displaced disaster survivors would have to remain in the temporary housing they have acquired through their own resources and possibly far from their original home. The recovery of flood survivors and their communities would be further compounded by fewer housing options. They would continue to suffer social and economic stresses related to the disaster recovery.

Alternative 2 - Develop the 2097 West Park Phase 2 Group Site with MHUs (Proposed Action)

The availability of federal assistance, including temporary housing for displaced individuals, is consistent with EO 12898. All forms of FEMA disaster housing assistance are available to any affected household that meets the conditions of eligibility. This group-housing site is a temporary housing solution. Therefore, long-term adverse effects to minority and/or low-income populations would not be expected.

The availability of temporary housing would result in a positive impact to displaced individuals, regardless of whether they are minority and/or low income. Therefore, the Proposed Action would not pose disproportionately high and adverse public health or environmental effects on minority and low-income populations.

The Proposed Action would utilize the project site and design to contract for the construction of approximately 203 manufactured housing unit pads and all necessary support facilities. The potential site residents would be from areas within the parish which have been impacted by the flooding. The local community is aware of this action and may experience a slight localized increase in the need for public services, such as schools, fire and police services, childcare, and medical services. However, the overall demand for public and commercial services is not expected to be greater than the pre-disaster demand and potential impacts are expected to be minimal.

5.7 Hazardous Materials

The management of hazardous materials is regulated under various Federal and state environmental and transportation laws and regulations, including but not limited to RCRA; CERCLA; the Toxic Substances Control Act (TSCA); the Emergency Planning and Community Right-to-Know provisions of the Superfund Amendments and Reauthorization Act (EPCRA); the

Hazardous Materials Transportation Act (HMTA); 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 the laws provide for the investigation and cleanup of sites already contaminated by releases of hazardous materials, wastes, or substances.

Alternative 1- No Action Alternative

No impacts from hazardous materials are expected as a result of no federal actions.

Alternative 2 - Develop the 2097 West Park Phase 2 Group Site with MHUs (Proposed Action)

From a review of records including the EDR Radius Report dated January 19, 2022, it is not likely that there is a presence of any hazardous substances or petroleum products at the 2097 West Park Phase 2 Group Housing Site, nor is there any evidence of past or existing releases or any material threat of release of hazardous substances or petroleum products into the ground, ground water or structures in or near the Group Housing Site.

Therefore, under the Proposed Action Alternative, there are no anticipated impacts from hazardous materials and hazardous substances. Any unusable equipment, debris, and material on site would be disposed of prior to occupancy in an approved manner and location. In the event significant items (or evidence thereof) are discovered during implementation of the project, petroleum products, hazardous materials, and toxic waste will be handled, managed, and disposed of in accordance to the requirements and to the satisfaction of the governing local, state, and federal agencies.

5.8 Traffic and Transportation

Louisiana Department of Transportation and Development (LDOTD) is responsible for maintaining public transportation, state highways, interstate highways under state jurisdiction, and bridges located within the state of Louisiana. These duties include the planning, design, and building of new highways in addition to the maintenance and upgrading of current highways. Roads not part of any highway system usually fall under the jurisdiction of and are maintained by applicable local government entities; however, the LDOTD is responsible for ensuring all local agency Federal-aid projects comply with all applicable Federal and state requirements.

The project area is adjacent to West Park Avenue (LA 24) and South Waterplant Road. LA 24 connects to U.S. Highway 90 (US 90) in Grey, Louisiana. US 90 is a major east-west artery through Florida, Alabama, Mississippi, Louisiana, and Texas.

Alternative 1- No Action Alternative

Implementation of the No Action Alternative would not adversely affect the site traffic patterns, as no construction or other activities that would impact traffic would occur as a result of no federal actions.

Alternative 2 - Develop the 2097 West Park Phase 2 Group Site with MHUs (Proposed Action)

Under the Proposed Action, a temporary increase in construction-related traffic during the group site construction would occur. Impacts related to these construction activities would be minor and temporary. This site has been approved by the Parish for this temporary housing use.

All reasonable precautions to control site access will be taken during construction. All activities would be conducted in a safe manner in accordance with Occupational Safety and Health Administration (OSHA) work zone traffic safety requirements. The appropriate signage will be posted and fencing installed to minimize potential adverse public safety concerns. Appropriate signage and barriers will be in place prior to construction activities in order to alert pedestrians and motorists of project activities and traffic pattern changes. Traffic impacts from construction activities would be considered minor. The LDOTD and Parish will be coordinated with in the planning and construction of this group site, to establish appropriate traffic safety measures and management protocols for the area.

6.0 PUBLIC INVOLVEMENT

Public involvement is being performed in compliance with the NEPA, FEMA's Instruction 108-1-1 for implementing NEPA, and EOs 12898, 11988, and 11990. A Public Notice for public comments and public review for the Draft EA has been posted on the GOHSEP and Terrebonne Parish websites. This Draft EA is available at the following website

<https://www.fema.gov/emergency-managers/practitioners/environmental-historic/region/6>.

The public comment period will be limited to three (3) days from March, 9, 2022 at 5:00 PM CST, due to the emergency nature of this action and need to provide temporary housing solutions for survivors of Hurricane Ida.

Written comments on the Draft EA can be sent via email to dr-4611-fema-ehp-ia@fema.dhs.gov. When responding by email, please reference the project name, "**Temporary Housing – TR-5 2097 West Park Phase 2 Group Housing Site**" in the subject field. If no substantive comments are received, the Draft EA and FONSI will become final and no further public noticing will be conducted.

7.0 MITIGATION

Construction of the Proposed Action was analyzed based on the studies, consultations, and reviews undertaken as reported in this EA. The findings of this EA conclude that no significant adverse impacts on human, natural and cultural resources are anticipated from the Proposed Action. During project construction, short-term impacts on noise are anticipated and the conditions listed in this

Draft EA will mitigate and minimize these effects. Project short-term adverse impacts would be mitigated using BMPs, such as proper vehicle and equipment maintenance, and appropriate signage. Furthermore, given the Proposed Action is temporary (up to 18 months), no long-term adverse impacts are anticipated from the proposed project.

The following conditions must be met as part of this project:

- Any change to the approved scope of work will require re-evaluation for compliance with NEPA and other Laws and Executive Orders.
- This review does not address all federal, state, and local requirements. Acceptance of federal funding requires recipient to comply with all federal, state, and local laws. Failure to obtain all appropriate federal, state, and local environmental permits and clearances may jeopardize federal funding.
- Compliance with State Regulations: Placement of MHUs or other readily fabricated dwellings must be in accordance and in compliance with Louisiana regulations.
- Local Permitting and Codes: Any FEMA units will be installed in compliance with applicable local codes, ordinances and permitting requirements. Any contracted logistics installation entities (installers) for TTHU placement will secure all pertinent Federal, state, and local permits and approvals before work.
- Appropriate best management practices will be implemented during site development to minimize sediment migration from the site into nearby water bodies. Surface runoff will be controlled by using siltation controls such as silt fencing around the construction site to minimize erosion of materials into adjacent wetlands and/or waterways. Any disturbed soil will be protected with seed or sod after construction in order to decrease the amount of soil eroded by rainfall and runoff. Any fill stored on site will be appropriately covered to prevent erosion.
- The Contractor shall comply with the requirements for a point source discharge to waters of the State, a Louisiana Pollutant Discharge Elimination System (LPDES) permit may be required in accordance with the Section 401 and 402 of the Clean Water Act (CWA) and the Louisiana Clean Water Code.
- The Contractor shall comply with the requirements of the Louisiana Department of Environmental Quality (LDEQ) National Pollutant Discharge Elimination System (NPDES) permit(s) to observe precautions to control non-point source pollution, point-source pollution, reduce erosion, develop a Storm Water Pollution Prevention Plan (SWPPP) and implement all NPDES permit(s) required conditions.
- If during the course of work, archaeological artifacts (prehistoric or historic) are discovered, the Contractor shall stop work in the vicinity of the discovery and take all reasonable measures to avoid or minimize harm to the finds. The Contractor shall inform their Individual Assistance

(IA) contacts at FEMA, who will in turn contact FEMA Historic Preservation (HP) staff. The Contractor will not proceed with work until FEMA HP completes consultation with the SHPO, and others as appropriate.

- Unusable equipment, debris and material will be removed or disposed of prior to occupancy in an approved manner and location.
- In the event significant items (or evidence thereof) are discovered during implementation of the project, petroleum products, hazardous materials, and toxic waste will be handled, managed, and disposed of in accordance to the requirements and to the satisfaction of the governing local, state, and federal agencies.
- Construction activities with elevated noise levels will be limited from 7:00 A.M. to 7:00 P.M, unless otherwise approved by the Parish. Equipment and machinery used during construction will meet all local, State, and Federal noise regulations.
- The Louisiana Department of Transportation and Development (LDOTD) and Parish will be coordinated with in the planning and construction of this group site, to establish appropriate traffic safety measures and management protocols for the area.
- The appropriate signage must be posted, and fencing installed to minimize potential adverse public safety concerns. Appropriate signage and barriers will be in place prior to construction activities in order to alert pedestrians and motorists of project activities and traffic pattern changes.
- Once the temporary housing need has ended, FEMA expects that all manufactured housing units (MHUs) would be hauled from the site in accordance with Section 408(d)(2) of the Stafford Act and returned to a FEMA storage facility. Furthermore, the project site would be either reasonably restored to its previous condition and then seeded or left with the site improvements per the lease terms negotiated between the GSA with the landowner.
- MHUs shall comply with 24 CFR Part 3280 Manufactured Home Construction and Safety Standards (“Department of Housing and Urban Development [HUD] code”).
- Work will comply with all conditions of the U.S. Army Corps of Engineers Nationwide Permit #14.
- Health and Safety: Before unit occupancy, the responsible program, will provide applicants with a Health and Safety Advisory regarding the flood hazard, local emergency evacuation plans, right-of-entry during an emergency, and possible unit haul off.

8.0 LIST OF PREPARERS

EA Preparer(s):

- Jason Spencer, Environmental Protection Specialist, FEMA
- Victoria Luksha, Historic Preservation Specialist, FEMA

- Nicholas Moore, Historic Preservation Specialist, FEMA
- Ronald Love, Environmental Protection Specialist, FEMA
- Michael Bell, NEPA Review Specialist, FEMA

Field Team:

- Jody Craig, Temporary Housing Electrical Engineer, FEMA

Reviewers:

- Charles Barrowclough, Environmental Protection Specialist, FEMA
- Byron Flournoy, Environmental Protection Specialist, FEMA

Deputy Housing EHP Advisor (EHAD):

- Adam Borden, IM-CORE EHP Advisor, Office of Environmental Planning and Historic Preservation

Table 3: Summary Table—Affected Environment, Impacts, and Mitigation

Resource Area	Alternative 1- No Action Alternative	Alternative 2 - Proposed Action: Develop the Group Site with MHUs	Mitigation	Agency Coordination/ Permits
Soils	No change from current conditions.	Cancienne silt loam, Cancienne silty clay loam, and Schriever clay are considered prime farmland soil. FEMA's rating resulted in a total of 38 out of 60. In accordance with 7 CFR 658.4(c)(2), "sites receiving a total score of less than 160 (combined FEMA score total and NRCS score total) need not be given further consideration for protection and no additional sites need to be evaluated."	No mitigation required.	No agency coordination.
Water Quality	No change from current conditions.	There is potential for localized increase in sedimentation as a result of site preparation activities. Potential impact to water quality in downstream swales, ditches, and streams (e.g., turbidity, siltation, biological oxygen demand).	Appropriate BMPs will be implemented during site development to minimize sediment migration from the site into nearby water bodies. Surface runoff will be controlled by using siltation controls such as silt fencing around the construction site to minimize erosion of materials into adjacent wetlands and/or waterways. Any disturbed soil will be protected with seed or sod after construction in order to decrease the amount of soil eroded by rainfall and runoff. Any fill stored on site will be appropriately covered to prevent erosion. If the project results in a discharge to waters of the State, a Louisiana Pollution Elimination System (LPDES) permit may be required in accordance with the Section 401 of the	LDEQ may require a LPDES permit in accordance with the Sections 401 and 402 of the CWA and the Louisiana Clean Water Code.

			CWA and the Louisiana Clean Water Code.	
Wetlands	No change from current conditions.	A jurisdictional unnamed stream will be impacted with Alternative 2	No MHUs will be installed on the Project site where wetlands occur. Minimization measures for culvert crossing will be followed per the terms of USACE Nationwide Permit #14.	USACE NWP # 14.
Floodplains	No change from current conditions.	MHUs would not be installed within the 100-year floodplain.	The culvert crossing will be designed to accommodate the 100 year floodplain.	No agency coordination.
Coastal Zone Management	No change from current conditions.	MHUs would be installed in a designated coastal zone.	No mitigation required.	In a OCM response letter dated September 29, 2021 (Consistency number C20210142), the OCM concurred with FEMA's negative determination, as described by National Oceanic and Atmospheric Administration (NOAA) regulations on federal consistency at 15 CFR §930.
Ground Water	No change from current conditions.	Under the Proposed Action, there are no anticipated direct	No mitigation required.	Department of Health, and LDEQ.

		impacts to groundwater.		
Threatened and Endangered Species and Critical Habitat	No change from current conditions.	No effects to Threatened and Endangered Species and no Critical Habitat on the Project Site.	No mitigation required.	No agency coordination.
Cultural Resources	No change from current conditions.	Due to the emergency need to find safe housing locations for the many survivors, FEMA will follow Stipulation II.B.2 of the Agreement regarding Expedited Review for Emergency Undertakings. FEMA has determined that there would be no historical properties affected as a result of the Proposed Action. The SHPO concurred with this determination on February 24, 2022.	If during the course of work, archaeological artifacts (prehistoric or historic) are discovered, the Contractor shall stop work in the vicinity of the discovery and take all reasonable measures to avoid or minimize harm to the finds. The Contractor shall inform their Individual Assistance (IA) contacts at FEMA, who will in turn contact FEMA Historic Preservation (HP) staff. The Contractor will not proceed with work until FEMA HP completes consultation with the SHPO, and others as appropriate.	FEMA has consulted with SHPO and received their concurrence on February 24, 2022. FEMA consulted the Coshatta Tribe of LA, Eastern Shawnee of Oklahoma, Jena Band of Choctaw Indians, Mississippi Band of Choctaw Indians, and the Tunica-Biloxi Tribe of LA on February 23, 2022. The tribes did not respond within the regulatory timeframe.
Environmental Justice	No change from current conditions.	The Proposed Action would not pose disproportionately high and adverse public health or environmental effects on minority and low-income populations.	No mitigation required.	No agency coordination.
Hazardous Materials	No change from current conditions.	Under the Proposed Action, there are no anticipated impacts from hazardous materials and hazardous substances.	Unusable equipment, debris and material will be disposed of prior to occupancy in an approved manner and location. In the event significant items (or evidence thereof) are discovered during implementation of the project, petroleum products, hazardous materials, and toxic waste will be handled, managed,	No agency coordination.

			and disposed of in accordance to the requirements and to the satisfaction of the governing local, state, and federal agencies.	
Traffic and Transportation	No change from current conditions.	Under the Proposed Action, a temporary increase in construction-related traffic during the group site construction. Once the Proposed Action has been completed, traffic would be expected to return to normal.	The appropriate signage must be posted, and fencing installed to minimize potential adverse public safety concerns. The LDOTD and Parish will be coordinated with in the planning and construction of this group site, to establish appropriate traffic safety measures and management protocols for the area.	LDOTD

Figures



Figure 1: Aerial Photo and Vicinity of Proposed 2097 West Park Phase 2 Group Site



Figure 2: 2097 West Park Phase 2 Group Site Proposed Layout

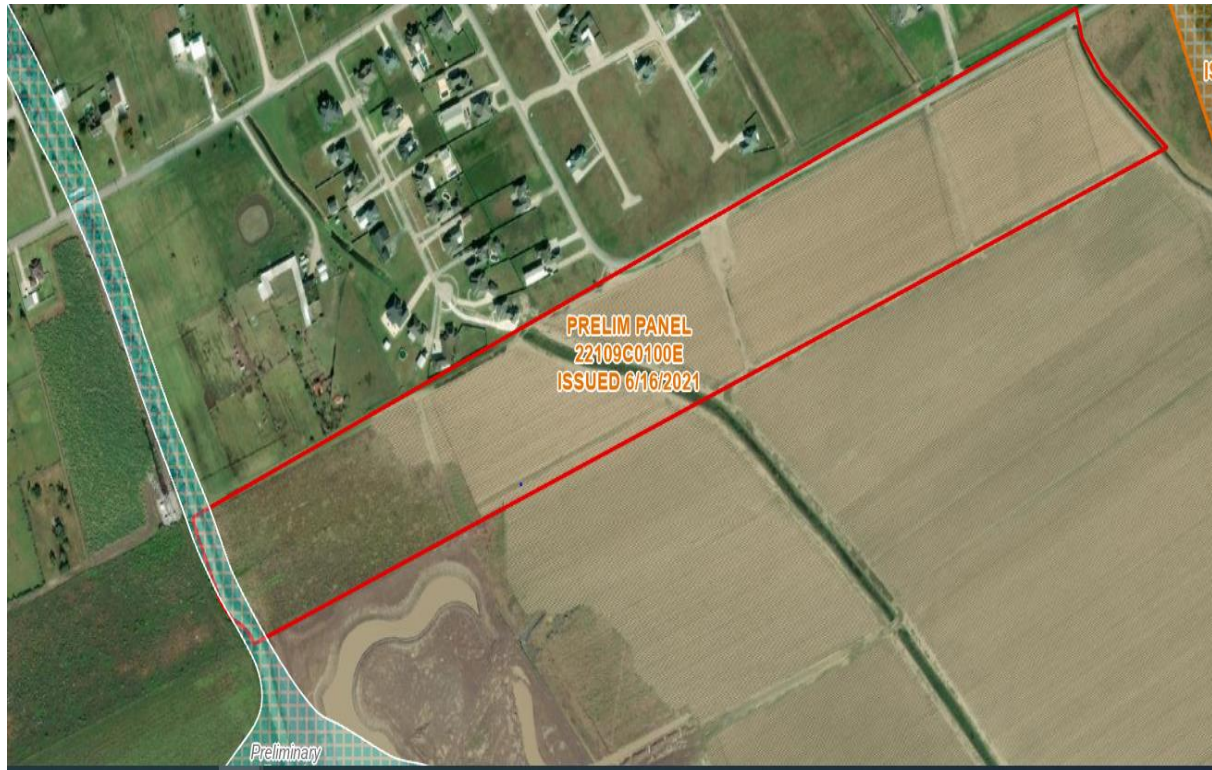


Figure 3: Flood Insurance Rate Map for Proposed 2097 West Park Phase 2 Group Site



Figure 4: Photograph of Existing Site Conditions at the Proposed 2097 West Park Phase 2 Group Site



Figure 5: Photograph of Existing Site Conditions at the Proposed 2097 West Park Phase 2 Group Site.

Attachments



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, NEW ORLEANS DISTRICT
7400 LEAKE AVE
NEW ORLEANS, LA 70118-3651

CEMVN-RG-J

26 January 2022

MEMORANDUM FOR Christopher Klein, SAD

SUBJECT: Hurricane Ida Temporary Housing 2096 West Park Phase 2 site (MVN-2022-00143-SB)

1. Reference is made to your request for a determination of regulatory permitting requirements to place temporary housing called the 2096 West Park Phase 2 site on property located in Section 1, Township 15 South, Range 16 East, Terrebonne Parish, Louisiana (enclosed map).
2. Based on review of recent maps, aerial photography, and soils data, we have determined that the site contains non-wetland waters that may be subject to Corps' jurisdiction. The approximate limits of the non-wetland waters are designated in blue on the map. A Department of the Army (DA) permit under Section 404 of the Clean Water Act will be required prior to the deposition or redistribution of dredged or fill material into these waters of the U.S. Additionally, parts of the sites contain uplands that are not subject to Corps' jurisdiction. The approximate limits of the uplands are designated in green on the map. A DA permit will not be required for activities in the upland areas.
3. The delineation included herein has been conducted to identify the location and extent of the aquatic resource boundaries and/or the jurisdictional status of aquatic resources for purposes of the Clean Water Act for the particular site identified in this request. This delineation and/or jurisdictional determination may not be valid for the Wetland Conservation Provisions of the Food Security Act of 1985, as amended. If you or your tenant are USDA program participants, or anticipate participation in USDA programs, you should discuss the applicability of a certified wetland determination with the local USDA service center, prior to starting work.
4. You are advised that this approved jurisdictional determination is valid for a period of 5 years from the date of this letter unless new information warrants revision prior to the expiration date or the District Commander has identified, after public notice and comment, that specific geographic areas with rapidly changing environmental conditions merit re-verification on a more frequent basis.

Brad
Guarisco

BRAD GUARISCO
Chief, Jurisdiction and Enforcement Branch
Regulatory Division



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Guarisco
Date: 2022.01.26 11:27:06
-06'00'

Encl



January 21, 2022

Wetlands

- | | | | |
|---|--------------------------------|---|----------|
|  | Freshwater Emergent Wetland |  | Lake |
|  | Estuarine and Marine Deepwater |  | Other |
|  | Estuarine and Marine Wetland |  | Riverine |
|  | Freshwater Pond | | |

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

February 8, 2022
U.S. Army Corps of Engineers

Mr. Darrell Barbara
Chief, Western Permit Evaluation Branch
U.S. Army Corps of Engineers
Regulatory Division, MVN

The purpose of this letter is to provide the United States Army Corps of Engineers (USACE) a pre-construction notification (PCN) regarding a Nationwide Permit (NWP) No.14 (Linear Transportation) for a direct housing site for FEMA. An ENG Form 6082 is attached for reference.

Location: Project is located at 2096 W Park Avenue, Terrebonne Parish, LA 70301. (29.7284 latitude, -90.7885 longitude). The property can be located on the Gray, LA 1:24K topographic map. Maps showing the area are attached.

Background: The property is used for agricultural purposes. No structures, roadways, or attendant features are located onsite. The surrounding area consists of agriculture land, commercial/industrial/residential developments, and roadways.

Description of Proposed Project: FEMA is requesting a NWP #14 for the installation of a 36 inch culvert by approximately 90 linear feet to access an adjoining property. Approximately 70 cubic yards of material will be placed below the ordinary high-water mark for the culvert crossing. A concept of the area to be used and the culvert crossing is attached for reference.

Additional Authorizations: No other NWP(s), regional permit(s), or individual permit(s) have been used or are intended to be used to authorize this project or any related activity. According to the ORM mapping system the project site does not appear to be located within the limits of any Civil Works Programs or require a Section 408 review. Additionally, the project is not subject to any previous permitting or unauthorized activity.

LDNR Coastal Use Permit: According to the Louisiana Department of Natural Resources (LDNR) Coastal Use Permit (CUP) self-determination tool at (<http://sonris-www.dnr.state.la.us/gis/Permit>) a CUP application is not needed. The proposed project would not likely have significant adverse impacts to coastal resources located outside of the proposed project area footprint.

Floodplain: The project area is located in Flood Zone X (area of minimal flood hazard). See attached map.

Jurisdiction “Waters of the US”, Including Wetlands: On 26 January 2022 the Corps provided an Approved Jurisdictional Determination for the project site (MVN-2022-00143-SB). This determination has been attached for reference.

Threatened and Endangered Species and Critical Habitat: According to information obtained from the United States Fish and Wildlife Service (USFWS) IPAC, the project lies within the range of the West Indian Manatee (*Trichechus manatus*), a Federally-listed threatened species. The species is generally prefer shallow, slow-moving waters of rivers, estuaries, saltwater bays, canals, and coastal areas. Given the lack of habitat within the project area it is likely the proposed project would have no effect to the species. Additionally, the property is not considered any type of critical habitat.

Cultural/Historical Resources: The National Register of Historic Place (NRHP) database has been consulted and it has been determined there are no properties currently listed on the register that are within or immediately adjacent to the proposed project area. In accordance with 33 CFR 325 Appendix C, 3(b) (1—3), after an evaluation of the nature, scope, and magnitude of the work occurs, it may be determined that there is little likelihood that a historic property exists, or if such property does exist, would be likely to be unaffected. Three (3) such situations are: areas extensively modified by previous work, areas that have been created in modern times, and work that is of a limited nature and scope that there is little likelihood of affecting a historic property, even if such property existed. In this case, the work is within one (1) stream, at one single and complete location, and is of a limited nature and scope. Additionally, the project area is bounded to the north and south by large residential developments. Therefore, it is expected the proposed project would have no potential to cause effects to any historic properties listed on, determined to be eligible for listing on, or potentially eligible for listing on the NRHP, including previously unidentified properties.

Mitigation: Due to the limited nature of impacts for the culvert crossing no mitigation is required. Additionally, when the site is no longer needed for temporary housing efforts the culvert installation and associated fill material will be removed in its entirety and the site restored back to pre-impact contours.

Please feel free to reach out to me if you have any questions or need additional information to add in your review.

Thanks,

A handwritten signature in black ink, appearing to read "Cecil M. Cox". The signature is fluid and cursive, with the first letters of each name being capitalized and prominent.

Cecil Cox
NEPA Compliance Officer
304-807-0796 Mobile
Cecil.m.cox@usace.army.mil



State of Louisiana
DEPARTMENT OF NATURAL RESOURCES
OFFICE OF COASTAL MANAGEMENT

September 29, 2021

Jerame J Cramer
EHP Advisor
FEMA-State Joint Field Office Region 6
[REDACTED]

RE: **C20210142**, Coastal Zone Consistency
FEMA – State Joint Field Office
Direct Federal Action – Negative Determination
Temporary housing assistance through the Individuals and Households Program (IHP).
**Jefferson, Lafourche, Livingston, Plaquemines, St. Charles, St. Helena, St. James,
St. John the Baptist, Tangipahoa, and Terrebonne Parish**

Dear Jerame J Cramer:

This office has received the above referenced negative consistency determination, in accordance with Section 307(c) of the Federal Coastal Zone Management Act of 1972, as amended. After careful review we have determined that the project does not demonstrate any reasonably foreseeable effects on coastal uses or resources. Therefore we concur with your negative determination, as described by NOAA regulations on federal consistency at 15 CFR §930.35.

Please refer to the above Consistency number when corresponding on this matter. If you have any questions please call Mark Hogan of the Consistency Section at ([REDACTED]) or [REDACTED]

/S/ **Charles Reulet**
Administrator
Interagency Affairs/Field Services Division

CR/SK/MH

From: [REDACTED]
To: [DCRT Section 106](#)
Cc: [REDACTED]
Subject: RE: FEMA Expedited Emergency Section 106 Consultation for 2097 West Park Avenue, Terrebonne Parish, Louisiana
Date: Wednesday, February 23, 2022 2:54:12 PM
Attachments: [REDACTED]

EXTERNAL EMAIL Please do not click on links or attachments unless you know the content is safe.

Dear SHPO Partners:

Attached please find FEMA's expedited emergency Section 106 consultation letter regarding the below project.

RE: Section 106 Review Expedited Consultation, Hurricane Ida, FEMA-4611-DR-LA
Undertaking: Temporary Housing Group Site – 2097 West Park Avenue Phase 2, Terrebonne Parish, Louisiana (GPS coordinates, NE corner: 29.729976, -90.784043)
Determination: No Historic Properties Affected

Your prompt review is greatly appreciated. We respectfully request concurrence with the proposed APE and with this determination within three (3) days from receipt of this consultation, per Stipulation II.B.2 of the 2016 Statewide PA. Should you have any questions or need additional information regarding this Undertaking, please contact the names listed on the letter or [REDACTED], or [REDACTED]. Jerame Cramer is currently out of the office on a rotation and will be unavailable during the comment period.

Thanks you in advance for your continued support of FEMA's Direct Housing Mission to provide needed housing solutions to the survivors of Hurricane Ida!

Sincerely,

Brandon Badinger
Environmental Protection Specialist | Environmental and Historic Preservation | Mitigation – Region 6
DR 4611 LA Historic Preservation Lead - Housing
Louisiana Integration and Recovery Office (LIRO)
[REDACTED]
[REDACTED]

Federal Emergency Management Agency
[fema.gov](https://www.fema.gov)

No known historic properties will be affected by this undertaking. Therefore, our office has no objection to the implementation of this project. This effect determination could change should new information come to our attention.



Kristin P. Sanders
State Historic Preservation Officer
Date 2/24/2022



FEMA

February 23, 2022

Kristin Sanders
State Historic Preservation Officer
Department of Culture, Recreation & Tourism
1051 North Third Street
Baton Rouge, LA 70802

Re: Section 106 Consultation, Expedited Review, Hurricane Ida, FEMA DR 4611-LA

Temporary Housing Group Site – 2097 West Park Avenue Phase 2, Terrebonne Parish,
Louisiana (GPS coordinates, NE corner: 29.729976, -90.784043)

Determination: No Historic Properties Affected

Dear Ms. Sanders:

The Federal Emergency Management Agency (FEMA) will be providing funds authorized under the Robert T. Stafford Disaster Relief and Emergency Assistance Act, or "Stafford Act," P.L. 93-288, as amended, in response to Disaster Declaration FEMA DR4611-LA for Hurricane Ida, dated August 29, 2021. Section 408(c)(1)(B) of the Stafford Act, as implemented in 44 C.F.R. Part 206, authorizes FEMA to provide Direct Temporary Housing Assistance or "Direct Assistance" for temporary housing due to a lack of available housing resources. FEMA is authorized to provide Direct Assistance in Ascension, Assumption, East Baton Rouge, East Feliciana, Iberia, Iberville, Jefferson, Lafourche, Livingston, Orleans, Plaquemines, Pointe Coupee, St. Bernard, St. Charles, St. Helena, St. James, St. John the Baptist, St. Martin, St. Mary, St. Tammany, Tangipahoa, Terrebonne, Washington, West Baton Rouge, and West Feliciana Parishes under the Individuals and Households Program.

FEMA is initiating Section 106 review for the above referenced Undertaking in accordance with the Programmatic Agreement among FEMA, the Louisiana State Historic Preservation Officer (SHPO), the Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP), and Participating Tribes, executed on December 21, 2016, as amended (2016 Statewide PA). Due to the emergency need to find safe housing locations for the many survivors, FEMA is consulting per 36 CFR § 800.12(d) and Stipulation II.B.2 of the 2016 Statewide PA regarding Expedited Review for Emergency Undertakings.

As a result of the damage caused by Hurricane Ida, approximately 9248 survivors will require temporary housing assistance, with 2740 survivors within Terrebonne Parish. FEMA anticipates needing to provide approximately 1483 housing solutions in Terrebonne Parish through the

placement of Transportable Temporary Housing Units (TTHU) and Uniform Federal Accessibility Standard (UFAS) housing units within multiple group sites.

FEMA is initiating consultation for one (1) potential group site in Terrebonne Parish with this consultation letter. The proposed group site will be located at 2097 West Park Avenue, Schriever, Louisiana within parcel 7037 (Figure 1). It covers an area of 36.6 acres (ac) or 14.81 hectares (ha). The location of the group site as well as the approximate number of TTHUs and UFAS, parcel size in acres, and associated figure numbers are included in Table 1.

Table 1: Proposed Group Site

Site Name	Figure #s	City	Parish	Parcel #	Parcel (Acres)	No. TTHUs	Coordinates
2097 W Park Ave Ph 2	1 - 2	Schriever	Terrebonne	7307	36.6 ac	114 MHU; 24 UFAS	29.724624, -90.800045 W 29.726283, -90.794901 N 29.725360, -90.794193 E 29.723623, -90.799514 S

The Undertaking will require grading and leveling for the installation of roads and individual gravel site pads to support approximately 114 TTHUs, 24 UFAS, and 1 office. Excavation for the installation of subsurface water, sanitation, and electric utilities would be required for each individual TTHU and UFAS and would extend as required to connect to existing utility tie-ins at the adjacent roadways. Access roads for ingress and egress to and from the site and circulation roads to allow access to each individual unit would be constructed, and gravel pads for parking and trash, concrete parking pads for units with residents requiring upgrades to meet ADA compliance requirements, site lighting, and a perimeter privacy fence would be installed (Figure 2) shows the proposed site plan for the TTHUs as developed by the U.S. Army Corps of Engineers (USACE).

Equipment staging would be limited to within the group site boundary and would not extend to any undisturbed ground that may be adjacent to the proposed group site. Debris generated during construction would be removed to an existing, licensed landfill. Any fill would be obtained from an existing commercial borrow source. The exact depth of excavation and grading at the group sites is unknown but would not exceed a maximum of 3.5 feet for utility trenching and would otherwise be limited to the least extent necessary to facilitate construction and to comply with building code requirements. The TTHUs will likely be removed once more permanent housing solutions are found for displaced individuals and families. However, site improvements such as underground utilities, gravel and concrete pads, the perimeter fence, and access and circulation roads may remain.

FEMA has proposed the Area of Potential Effects (APE) for the proposed Undertaking to include a three-quarter mile viewshed from the center of the proposed group site and the footprint of the group site including access roads for direct effects related to the proposed work as depicted in Figure 3. The proposed group site location is active farmland and has been in continuous use for over 50 years. In accordance with Stipulation II.C(2)(b) of the 2016 Statewide PA, FEMA is

requesting your concurrence with the proposed APE.

During the week of February 9, 2022, FEMA Historic Preservation Specialists consulted the Louisiana Office of Cultural Development's Cultural Resources National Register database, the Louisiana Cultural Resources Map and associated site files (LDOA website), the US Department of Agriculture Web Soil Survey maps (USDA Website), various digital archival resources, photos, and historic maps to identify the presence of historic properties within the APE.

Several soil types are present in the project area (Figure 4). The dominant soil type is Cancienne silt loam, 0 to 1 percent slope which is found on natural levees, is somewhat poorly drained, but is classified as prime farmland. A typical soil profile consists of a 0 to 23 inch-thick plowzone above a silty clay loam subsoil. Lesser amounts of Cancienne silty clay loam, 0 to 1 percent slope and Schriever clay, 0 to 1 percent slope are also present. Cancienne silty clay loam is found on natural levees and is somewhat poorly drained to poorly drained. Schriever clay is found in the backswamps of floodplains. Both are classified as prime farmland. A small amount of Aqueens, dredged material that is next to the drainage canal, is also present in the APE. However, it is not classified as prime farmland (USDA Website).

Background research efforts identified two Phase I archaeological surveys that included portions of the APE. Three archaeological sites, 16TR341, 16TR127, and 16TR357, have been recorded in the APE, but only Site 16TR341 is within the project area's footprint. Site 16TR127 was recorded in the 1980s by Gregory DuCote and was described as a possible house site dating to the latter half of the nineteenth century and early twentieth century. The site has not been evaluated for inclusion in the National Register of Historic Places (NRHP). Site 16TR357 was recorded in 2021 during a Phase I survey conducted by R. Christopher Goodwin & Associates (RCGA) of a manicured grassy area situated in a residential yard at the southeastern intersection of West Park Avenue and Water Plant Road (LDOA Report #22-6923). The site was not evaluated for inclusion in the NRHP. Deposits associated with these sites will not be affected by and are outside of the proposed group site footprint.

A Phase I survey conducted by Coastal Environments, Inc. (CEI) included the south half of the project area's footprint (LDOA Report #22-5891). As a result of that survey, Site [REDACTED]. The site has not been evaluated for inclusion in the NRHP. Based on the 2018 survey, four new loci were recorded (Loci 6 to 9) and five previously recorded sites (16TR123 to 16TR127 and renamed Loci 1 to 5) were incorporated into the boundaries of Site 16TR341 (Figure 5). Survey methods consisted of visual inspection of the survey area followed by systematic shovel testing where surface artifacts or features were encountered. Locus 8, outside of the project area's footprint but within the APE, was identified on the east side of the archaeological site. The remaining loci were identified on the west side of the archaeological site, on the east side of West Park Avenue. Loci 1, 2, and 3 are in the APE but outside the current project area's footprint.

CEI based the site boundaries on a survey map of the plantation dated to 1937 and therefore named the site Evergreen Plantation 1937 to indicate that the limits depicted on the site form are specific to 1937 and do not necessarily reflect the plantation limits at any other point in time. Much of the

north and east sides of the site have been disturbed by twentieth century development, and most of the west and south sides have remained partly wooded and active agricultural field. Although the Phase I survey did not extend fully into the current project area's footprint, the portion that was subjected to pedestrian survey produced no artifacts or features. Locus 8 was considered an artifact scatter and an outlier to the concentration of plantation-related features and finds which are located adjacent to West Park Avenue. Therefore, it is unlikely that archaeological resources associated with Site 16TR341 are present in the current project area's footprint.

The majority of the APE consists of agricultural land surrounded by twentieth century development. There are no standing structures located within the APE that are individually listed on the NRHP, nor are there any National Register Historic Districts or any standing structures that have been listed or previously determined to be eligible for listing on the NRHP. The Schriever water treatment plant and a housing development are located on the north side of the APE. The water treatment plant was first depicted on the 1981 topo map and 1982 aerial, and the housing development was constructed after 2008 (NETR online). Housing development on the east side of the APE was limited until about 1990 when the pace of construction dramatically increased.

A Chevron facility was built in 2012 and is located on the west side of the APE, on the east side of West Park Avenue. Historic maps dating back to 1892 depict several houses located on the east side of what is today West Park Avenue but nearly all those structures have been razed and replaced through time (Figures 6 and 7). Currently, the Department of Housing and Urban Development (HUD) funded resettlement of the Isle De Jean Charles Native American Tribe is underway and approximately 50% complete immediately to the south. Given the extensive surrounding recent developments, subsequent landscape modifications that have taken place, and the absence of NRHP listed or eligible properties or Districts within the APE, the placement of temporary housing in the project area is unlikely to have an effect on any NRHP eligible standing structures.

FEMA has determined that areas of the proposed site that are closer to Bayou Terrebonne have a higher likelihood for the presence of archaeological deposits. To reduce ground disturbance in these areas, some design changes have been implemented in coordination with the USACE design team. The TTHUs originally planned for the westernmost portion of the parcel (adjacent to West Park Road) and closest to Bayou Terrebonne were removed entirely from consideration. This mitigation measure created a buffer measuring approximately 1,700 feet set back from the road to avoid any possible precontact sites that may be located in close proximity to the bayou and to the historic site loci related to Evergreen Plantation 1937 (Site 16TR341).

FEMA has determined that there are no historic properties in the APE as defined in 36 CFR 800.16(l). Based on the above identification and evaluation efforts, archaeological deposits are not likely to be present within the proposed group site footprint due to land use, nearby development, and previous survey results. In addition, avoidance measures have been implemented to remove housing units from being installed where ground disturbance may have the potential to encounter archaeological resources. Therefore, FEMA has determined a finding of **No Historic Properties Affected** in accordance with Stipulation II.C.4 of the 2016 Statewide PA. FEMA would condition its approval of the group site on the following:

If during the course of work, archaeological artifacts (prehistoric or historic) are discovered, the Contractor shall stop work in the vicinity of the discovery and take all reasonable measures to avoid or minimize harm to the finds. The Contractor shall inform their Individual Assistance (IA) contacts at FEMA, who will in turn contact FEMA Historic Preservation (HP) staff. The Contractor will not proceed with work until FEMA HP completes consultation with the SHPO, and others as appropriate.

Due to the urgent need to provide housing for displaced individuals and households, your prompt attention to this matter would be greatly appreciated. We respectfully request concurrence with the proposed APEs and with this determination within three (3) days from receipt of this consultation, per Stipulation II.B.2 of the 2016 Statewide PA. Should you have any questions or comments, please do not hesitate to contact FEMA Archaeologist Victoria Luksha by phone at [REDACTED] or by email at [REDACTED], and FEMA Historic Preservation Lead Brandon Badinger by phone [REDACTED] or by email at [REDACTED] or me by phone at [REDACTED] or by email at [REDACTED]

Sincerely,

Adam Borden
EHP Advisor
Region 6
FEMA-State Joint Field Office
FEMA-4611-DR-LA
1500 Main St
Baton Rouge, LA 70802

Enclosures: USACE Plan Set