

*APPENDIX A*  
*Correspondence*





**FEMA**

October 31, 2008

F. Lawrence Oaks  
State Historic Preservation Officer  
Texas Historical Commission  
P.O. Box 12276  
Austin, Texas 78711-2276

RE: Consultation request and review of the draft Programmatic Environmental Assessment for the Alternative Housing Pilot Program Permanent Housing for the State of Texas

Dear Mr. Oaks:

Recognizing the extensive and complex housing challenges facing victims and communities as a result of Hurricanes Katrina and Rita, and acknowledging the limitations on Federal Emergency Management Agency's (FEMA) ordinary statutory authority to provide non-temporary housing solutions, Congress appropriated funds to the Department of Homeland Security to support alternative housing pilot programs (Emergency Supplemental Appropriations Act, 2006, Public Law 109-234). The Alternative Housing Pilot Program (AHPP) represents a one-time exception to FEMA's existing authority under the Stafford Act, which legally binds FEMA to a temporary housing mission reliant primarily on travel trailers and manufactured homes, by providing an opportunity to explore, implement, and evaluate innovative approaches to housing solutions, and to address ongoing housing challenges created by the 2005 hurricane season in the states of the Gulf Coast region, including the State of Texas.

The Texas Department of Housing and Community Affairs (TDHCA) Disaster Recovery Division applied for FEMA funding under the AHPP to provide both temporary and permanent housing solutions for eligible families displaced from Hurricane Rita. TDHCA proposes to provide permanent housing within Chambers, Hardin, Harris, Jasper, Jefferson, Liberty, Newton, Orange, Polk, and Tyler counties.

The National Environmental Policy Act of 1969 (NEPA) and its implementing regulations 40 C.F.R. Part 1500 and 44 C.F.R. Part 10 direct FEMA to take into consideration the environmental consequences of proposed actions during the decision-making process. FEMA must comply with NEPA before making Federal funds available for any FEMA program.

FEMA determined that the recurring proposed actions that require an Environmental Assessment can be grouped by the nature and location of the proposed actions. These actions can be evaluated through a Programmatic Environmental Assessment (PEA) for compliance with NEPA

and its implementing regulations without developing an EA for every action. FEMA determined that a PEA can be prepared to analyze the potential environmental impacts of TDHCA's proposed permanent housing phase within the ten abovementioned counties. Gulf South Research Corporation has been retained by FEMA to prepare a PEA for the AHPP permanent installation projects. FEMA will use this PEA to determine the level of environmental documentation required under NEPA for any proposed permanent housing action in Texas, given the available site-specific information. If the alternatives, levels of analysis, and site-specific information of an action proposed for FEMA funding are fully and accurately described in this PEA, FEMA will prepare a memorandum documenting this determination. This memorandum would state that FEMA has reviewed the proposed action, alternatives, and potential direct, indirect and cumulative impacts and found them to be accurately described by this PEA and its associated Finding of No Significant Impact. Should FEMA determine that an action has the potential to affect a resource; a tiered Supplemental Environmental Assessment would be prepared. Should an action fall outside the alternatives outlined below, FEMA would prepare an EA for that proposed action.

At this time, FEMA requests that your agency review the draft PEA which can be viewed on and downloaded from FEMA's website at <http://www.fema.gov/plan/ehp/envdocuments/ea-region6.shtm>. Any concerns raised will be addressed in the PEA and formal consultation will allow for your review of the final document.

Alternative 1: No Action Alternative. Persons who are receiving temporary resources would continue to do so. The No Action Alternative is defined as maintaining the *status quo*, with no FEMA funding for long-term or permanent housing. This alternative evaluates the effects of not providing long-term or permanent housing and provides a benchmark against which the action alternatives may be evaluated.

Alternative 2: Installation of a Permanent AHPP Unit on the Former Dwelling Footprint. Under this alternative, AHPP units would be placed on the eligible applicant's property, within the former dwelling's footprint. As AHPP units would be placed within the former dwelling's footprint, all sites consist of previously disturbed land. All units would be located outside of the Coastal High Hazard Area (CHHA) and the 100-year floodplain and elevated above the Base Flood Elevation (BFE), where applicable.

Alternative 3: Installation of a Permanent AHPP Unit on a New Footprint Within the Property Occupied by the Former Dwelling. This alternative would place AHPP units on the same property as the applicant's former dwelling, but in a location outside of the footprint of the storm-damaged housing structure, at the applicant's request. Projects under this alternative would include the placement of units on either disturbed or undisturbed portions of the applicant's property. All units would be located outside of the CHHA and the 100-year floodplain and elevated above the BFE, where applicable.

Alternative 4: Installation of a Permanent AHPP Unit on an Alternate Site on Previously Disturbed Land. This alternative would locate a single AHPP unit at an alternate property than

the applicant's former dwelling, placing the unit on previously disturbed land. Previously disturbed land would include land that was previously residential or agricultural. The site would be cleared of all debris and vegetation, then grubbed, contoured, and graded, if necessary. Additional ground disturbing activities would include the installation or modification of utilities (*i.e.*, utility lines, septic systems, water wells) and entryways (driveways, sidewalks, *etc.*). All units would be located outside the CHHA and the 100-year floodplain.

Alternative 5: Installation of a Permanent AHPP Unit on an Alternate Site on Undeveloped Land. Under this alternative, a single AHPP unit would be installed at an alternate property than the applicant's former dwelling, placing the unit on undeveloped land. The site would be cleared of all debris and vegetation, then grubbed, contoured, and graded, if necessary.

We would appreciate any available information under your agency's jurisdiction to assist us in efforts to aid in the approval of this PEA. The 30-day comment period will start on November 5, 2008 and end on December 4, 2008. Please submit your comments to Amy Barnes, FEMA Region VI, 800 North Loop 288, Denton, TX 76209-3698, or by Fax: (940) 898-5195 or email: [FEMA-pea-comments@dhs.gov](mailto:FEMA-pea-comments@dhs.gov).

Sincerely,



Donald R. Fairley, REM  
Regional Environmental Officer  
FEMA Region VI



**FEMA**

October 31, 2008

Adam Zerrenner  
Field Supervisor  
Austin Ecological Services Field Office  
U.S. Fish and Wildlife Services  
10711 Burnet Road, Suite 200  
Austin, Texas 78758

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Sincerely,



Donald R. Fairley, REM  
Regional Environmental Officer  
FEMA Region VI

*APPENDIX B*  
*Figures*





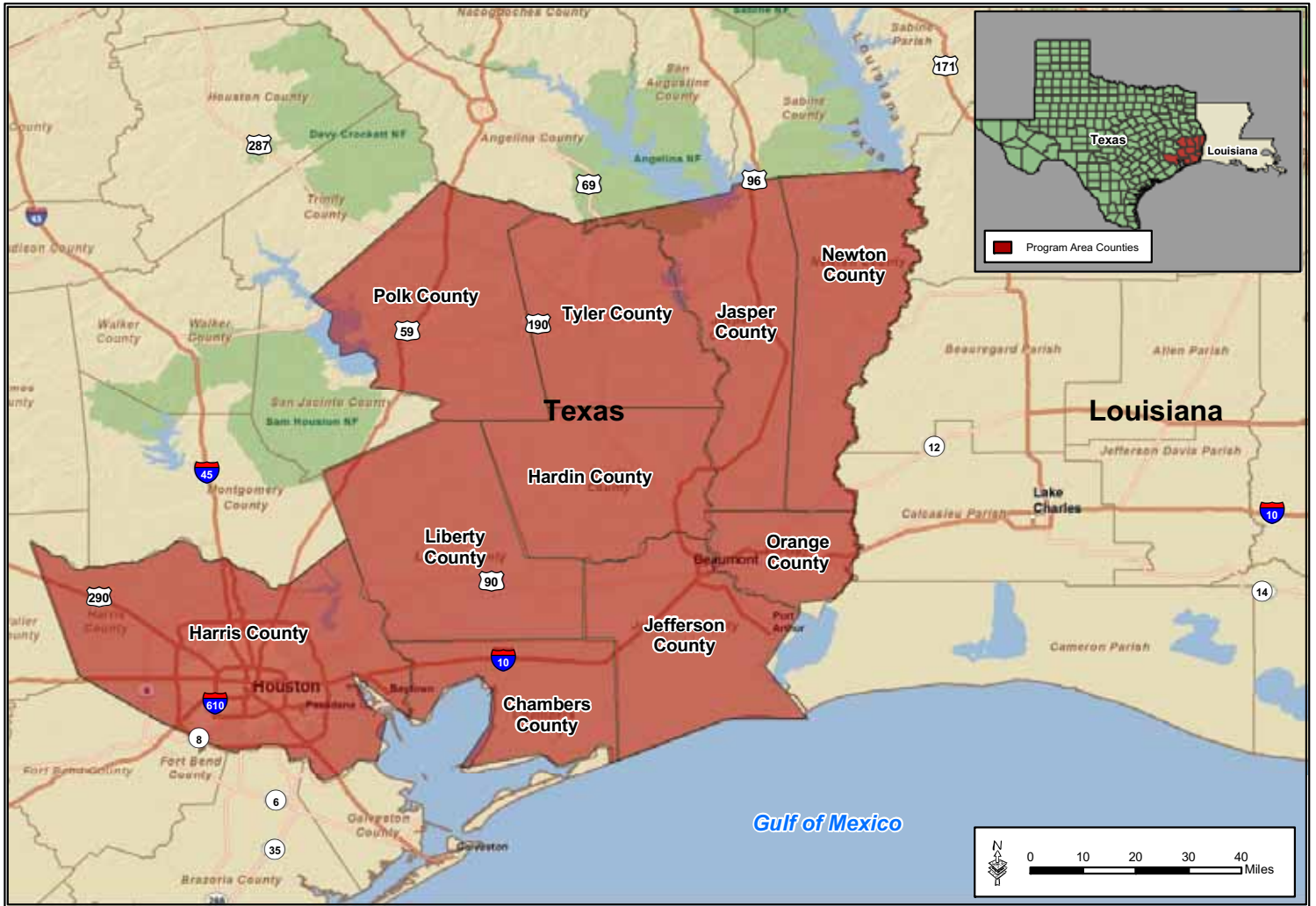


Figure 1: Program Area

*APPENDIX C*  
*Threatened and Endangered Species*

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**Table 1. Threatened and Endangered Species Occurring in the Program Area**

<b>Scientific Name</b>	<b>Common Name</b>	<b>Status</b>	<b>Counties</b>
bald eagle	<i>Haliaeetus leucocephalus</i>	DM	Chambers, Hardin, Harris, Jasper, Jefferson, Liberty, Newton, Orange, Polk, and Tyler
brown pelican	<i>Pelecanus occidentalis</i>	DM, E	Chambers
green sea turtle	<i>Chelonia mydas</i>	E, T	Chambers and Jefferson
hawksbill sea turtle	<i>Eretmochelys imbricata</i>	E	Chambers and Jefferson
Kemp's ridley sea turtle	<i>Lepidochelys kempii</i>	E	Chambers and Jefferson
leatherback sea turtle	<i>Dermochelys coriacea</i>	E	Chambers and Jefferson
loggerhead sea turtle	<i>Caretta caretta</i>	T	Chambers and Jefferson
Louisiana black bear	<i>Ursus americanus luteolus</i>	T	Jasper and Newton
Louisiana pine snake	<i>Pituophis ruthveni</i>	C	Jasper, Newton, and Tyler
Navasota ladies'-tresses	<i>Spiranthes parksii</i>	E	Jasper
piping Plover	<i>Charadrius melodus</i>	E, T	Chambers and Jefferson
red-cockaded woodpecker	<i>Picoides borealis</i>	E	Hardin, Jasper, Liberty, Newton, Polk, and Tyler
Texas prairie dawn-flower	<i>Hymenoxys texana</i>	E	Harris
Texas trailing phlox	<i>Phlox nivalis ssp. texensis</i>	E	Hardin, Polk, and Tyler

E = endangered, T = threatened, C = candidate, DM = Delisted Taxon, Recovered, Being Monitored First Five Years  
 Source: USFWS 2008b