



**DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, NEW ORLEANS DISTRICT
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NEW ORLEANS, LOUISIANA 70118-3651**

FINDING OF NO SIGNIFICANT IMPACT

HURRICANE IDA UNWATERING of

**JEFFERSON, LAFOURCHE, PLAQUEMINES, & ST. BERNARD PARISHES,
LOUISIANA
EA # 592**

The U.S. Army Corps of Engineers (USACE), New Orleans District (CEMVN), has performed an Environmental Assessment (EA) in accordance with the National Environmental Policy Act of 1969 (NEPA), as amended. The EA addresses the Hurricane Ida Unwatering of Jefferson, Lafourche, Plaquemines, & St. Bernard Parishes, Louisiana undertaken by USACE as a Mission Assignment from FEMA to address flooding that occurred during Hurricane Ida.

The action consisted of emergency response in the form of unwatering of certain portions of South Louisiana to address flooding caused by Hurricane Ida. Flooding of certain areas within Louisiana resulted from storm surge, rapid rainfall accumulation, and failing of State and locally owned permanent pump stations that were made temporarily unavailable due to either lack of electricity or other failing components. The coverage area of the unwatering mission put forth by FEMA included Jefferson Parish, Lafourche Parish, St. Bernard Parish, St. John the Baptist Parish, and Plaquemines Parish. USACE did not participate in the St. John the Baptist Parish unwatering because the hydraulic information collected from gauge data and visual inspections in that parish indicated that the impounded storm water would recede in the same timeframe regardless of whether temporary unwatering pumps were deployed. Though no unwatering was done by USACE in St. John the Baptist Parish, USACE remained on standby for this area and monitored the situation closely until all water was gone.

The USACE, in a Mission Assignment from FEMA, used temporary unwatering pumps and engineered levee cuts to accomplish the unwatering mission set forth from FEMA in Jefferson Parish, Lafourche Parish, St. Bernard Parish, and Plaquemines Parish. Nineteen temporary unwatering pumps were used within four parishes, Jefferson Parish, Lafourche Parish, Plaquemines Parish, and St. Bernard Parish between September 2, 2021, to December 24, 2021. Twenty-one engineered levee cuts and eleven armoring projects were executed within Plaquemines Parish between September 1, 2021, to September 7, 2021.

NEPA requires that in analyzing alternatives to a proposed action, a federal agency must consider an alternative of “No Action.” The No Action alternative evaluates the impacts associated with not implementing the action and represents the Future without Project (FWOP) condition against which alternatives considered in detail are compared. The FWOP provides a baseline essential for impact assessment and alternative analysis. In this case, the No-action alternative would have left floodwater in place until the permanent pumps were back online. Given the nature of the flooding, restoring power to some of those permanent pumps would have involved risk to the personnel responsible for power restoration. Ultimately, leaving the floodwater in place was not a feasible alternative.

For the Selected Action, the effects were evaluated. A summary of the effects is listed in Table 1:

Table 1: Summary of Effects of the Action.

Resource	Insignificant effects	Insignificant effects as a result of mitigation	Resource unaffected by action
Wetlands	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Aquatic Resources/Fisheries	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Wildlife Habitat	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Terrestrial Resources	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Threatened/Endangered Species – Critical Habitat	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Cultural Resources	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Water Quality	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Air Quality	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Hazardous, Toxic & Radioactive Waste	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tribal Trust Resources	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The appropriate application of mitigation is first to avoid adverse impacts, then minimize adverse impacts, and lastly, compensate for unavoidable impacts. All practicable and appropriate means to avoid or minimize adverse environmental effects were analyzed and incorporated into the action. No impacts requiring compensatory mitigation were identified. The effects, which were found to be minimal and insignificant, are briefly discussed below.

EA #592 evaluates the impacts associated with the unwatering mission. No jurisdictional waters of the U.S. (including wetlands) were significantly impacted, and no fill material was found to be placed into those Waters of the U.S. Adverse effects were avoided and minimized to the fullest extent practical by collocating temporary pumps with existing permanent pump stations in most instances. One location had temporary pumps discharging slightly upstream from the existing pump station into the same receiving waterway.

Pursuant to section 7 of the Endangered Species Act of 1973, as amended, coordination with the U.S. Fish and Wildlife Service (USFWS) for managed species is ongoing. A determination of “No effect” to listed species managed by National Marine Fisheries Service (NMFS) was supported by the EA.

In accordance with 36 CFR § 800.12 (b), on September 14th, 2021, USACE notified the State Historic Preservation Officer (SHPO), Federally-recognized Tribes, and the Advisory Council on Historic Preservation (ACHP) (e.g., Consulting Parties) that USACE had been tasked by the Federal Emergency Management Agency (FEMA) to assist the State of Louisiana and local municipalities in the unwatering of critical infrastructure across Southeast Louisiana caused by extreme flooding associated with Hurricane Ida. Per 36 CFR § 800.12 (d), USACE determined and notified the Consulting Parties that unwatering operations qualified as an “emergency undertaking” and are exempt from the provisions of Section 106 of the National Historic Preservation Act (NHPA). On September 17th, 2021, the ACHP responded and concurred with USACE’s emergency undertaking determination. No other responses were received from Consulting Parties. On December 13th, 2021, USACE transmitted an after-event site visit summary report to Consulting Parties stating that USACE determined that there were no impacts to the human environment as a result of the emergency undertaking. CEMVN received a response from the Seminole Nation of Oklahoma on October 19th, 2021, that the emergency action caused No Adverse Effects to historic properties. No other responses were received from Consulting Parties.

The USACE found a water quality certification was not required for the actions taken during the Hurricane Ida Unwatering Mission. Moreover, no Section 404(b)(1) evaluation was found to be required because the action did not place fill material into Waters of the U.S.

Seventeen temporary unwatering pumps were placed at permanent pump stations. It was determined that sampling need not be conducted, nor a permit filed with Louisiana Department of Environmental Quality (LDEQ) because the temporary pumps would only be used to mimic the permanent pumps. The seventeen temporary pumps only mimicked half of the production of the permanent pumps because the temporary pumps were used for only 12 hours a day. If the permanent pumps were in operations, the pumps would be used more than 12 hours a day. The usage of unwatering pumps compared to the permanent pumps resulted in a favorable water condition because the draw and discharge was significantly lower with the temporary unwatering pumps than the permanent pump station.

For the two temporary unwatering pumps placed north of the Larousse 19 permanent pump station, it was found that though these pumps were not placed at a permanent pump station, the canal in which these temporary unwatering pumps were used connects to the same water source as Larousse 19 Permanent Pump Station. The water that would have been in this canal would have been the same stormwater discharge that was being discharged from the temporary unwatering pump station placed at the

Larousse 19 Permanent Pump station. Due to the connection of both water bodies and the usage of the temporary unwatering pumps, sampling would not be conducted, nor a permit filed with LDEQ. The area where the two temporary unwatering pumps were placed was evaluated on August 26, 2022, and it was found that the vegetation within the general area of both the inlet and discharge of the unwatering pumps do not show signs of stress or lack of growth (indicating a lack accumulated fill material).

For levee cuts, the impacts would only be temporary to the surrounding bayous, streams, canals, and lakes due to the introduction of freshwater into a brackish ecosystem. The levee cuts would be in the general vicinity of the permanent pump stations so the impacts would mimic as if the permanent pump stations were operable. The levee cuts were on maintained levees and did not result in more than de minimus placement of fill material into Waters of the U.S.

A determination of consistency with the Louisiana Coastal Zone Management program pursuant to the Coastal Zone Management Act of 1972 has been provided to the Louisiana Department of Natural Resources, Office of Coastal Management. Final correspondence and concerns from their agency will be incorporated into the final documentation.

As the action evaluated in the EA was an Emergency Action evaluated through an after-the-fact NEPA document, no environmental design commitments are appropriate. No compensatory mitigation is necessary because no negative impacts on aquatic resources were identified.

The USACE has evaluated the environmental impacts of the emergency action described in EA #592. The action was essential to the protection of life and property in the action area. All applicable laws, executive orders, regulations, and local government plans were considered in our evaluation. All appropriate measures were taken to avoid and minimize adverse effects. Based on this evaluation, the reviews by other Federal, State and local agencies, Tribes, input of the public, and the review by my staff, it is my determination that the emergency unwatering of areas inundated by Hurricane Ida did not cause significant adverse effects on the quality of the human environment; therefore, preparation of an Environmental Impact Statement is not required

Date

CULLEN A. JONES
COL, EN
Commanding