U.S. Department of Housing and Urban Development 451 Seventh Street, SW Washington, DC 20410 www.hud.gov espanol.hud.gov

### **Project Information**

Project Name: HTHA BAYOU TOWERS DEMOLITION

HEROS Number: 900000010309444

Point of Contact: ANTOINE FORET, CDBG ADMINISTRATOR, TPCG

Consultant (if applicabl

e):

**Point of Contact:** 

Project Location: 7491 PARK AVE., HOUMA, LA 70364

Additional Location Information:

The corner of Scott Lane and West Park Ave./LA24

# Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

The Houma Terrebonne Housing Authority has submitted a Section 18 Demolition Application to the HUD New Orleans Public Housing Field Office and intends to demolish a thirteen story, 300-unit public housing facility known as Bayou Towers, located at 7491 West Park Avenue, Houma, LA 70364. The building was built and first occupied in 1971. The future use of the site is resale as clear, vacant land.

Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:

Existing Conditions and Trends [24 CFR 58.40(a)]:

Maps, photographs, and other documentation of project location and description:

Coastal Barrier Resource Map Pin Location.pdf

Statement of Loss.pdf

State Fire Marshal.pdf

Photos\_BT.pdf

#### **Determination:**

Finding of No Significant Impact [24 CFR 58.40(g)(1); 40 CFR 1508.13] The project will not result in a significant impact on the quality of human environment

Finding of Significant Impact	
	the state of the s

### **Funding Information**

Grant / Project Identification Number	HUD Program	Program Name
LA090	Public Housing	Public Housing Capital Fund (including CFFP and other grants)

Estimated Total HUD Funded, Assisted or Insured Amount:

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]:

# Compliance with 24 CFR §50.4, §58.5 and §58.6 Laws and Authorities

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6	Are formal compliance steps or mitigation required?	Compliance determination (See Appendix A for source determinations)
STATUTES, EXECUTIVE ORE	DERS, AND REGULATION	ONS LISTED AT 24 CFR §50.4 & § 58.6
Airport Hazards Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	□ Yes ☑ No	The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements.
Coastal Barrier Resources Act Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	□ Yes ☑ No	This project is not located in a CBRS Unit. Therefore, this project has no potential to impact a CBRS Unit and is in compliance with the Coastal Barrier Resources Act.
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001- 4128 and 42 USC 5154a]	□ Yes ☑ No	Based on the project description the project includes no activities that would require further evaluation under this section. The project does not require flood insurance or is excepted from flood insurance. While flood insurance may not be mandatory in this instance,

		HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with Flood Insurance requirements. Building demolition to the ground only.
	DERS, AND REGULATION	ONS LISTED AT 24 CFR §50.4 & § 58.5
Air Quality Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	□ Yes ☑ No	Based on the project description, this project includes no activities that would require further evaluation under the Clean Air Act. The project is in compliance with the Clean Air Act.
Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d)	□ Yes ☑ No	Based on the project description the project does not include any activities that would affect a Coastal Zone. The project is in compliance with the Coastal Zone Management Act. As per Louisiana Coastal resource guide, Subchapter C, Section 7253, Subsection B, 2. Activities on lands 5 feet or more above sea level or within fast lands are exempt. The building is 9.8 above sea level.
Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]	□ Yes ☑ No	Site contamination was evaluated as follows: None of the above. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. The project is in compliance with contamination and toxic substances requirements.
Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	□ Yes ☑ No	This project will have No Effect on listed species based on a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office. This project is in compliance with the Endangered Species Act.
<b>Explosive and Flammable Hazards</b> Above-Ground Tanks)[24 CFR Part 51 Subpart C	□ Yes ☑ No	Based on the project description the project includes no activities that would require further evaluation under this section. The project is in compliance

	· · · · · · · · · · · · · · · · · · ·	
		with explosive and flammable hazard
		requirements.
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	□ Yes ☑ No	This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is in compliance with the Farmland Protection Policy Act. Building demolition to the ground.
Floodplain Management	☐ Yes ☑ No	This project does not occur in a
Executive Order 11988, particularly section 2(a); 24 CFR Part 55		floodplain. The project is in compliance with Executive Order 11988.
<b>Historic Preservation</b> National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	□ Yes ☑ No	Based on the project description the project has No Potential to Cause Effects. The project is in compliance with Section 106.
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	□ Yes ☑ No	Based on the project description, this project includes no activities that would require further evaluation under HUD's noise regulation. The project is in compliance with HUD's Noise regulation.
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	□ Yes ☑ No	The project is not located on a sole source aquifer area. The project is in compliance with Sole Source Aquifer requirements.
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	□ Yes ☑ No	Based on the project description this project includes no activities that would require further evaluation under this section. The project is in compliance with Executive Order 11990. Building demolition to the ground.
Wild and Scenic Rivers Act Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	□ Yes ☑ No	This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act.
HUD HO	USING ENVIRONMEN	TAL STANDARDS
	ENVIRONMENTAL JU	
Environmental Justice Executive Order 12898	□ Yes ☑ No	No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898. Building demolition to the ground.

# Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27]

**Impact Codes**: An impact code from the following list has been used to make the determination of impact for each factor.

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor Adverse Impact May require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement.

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		LAND DEVELOPMEN	Г
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2		
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2		
Hazards and Nuisances including Site Safety and Site- Generated Noise	3	The deconstruction of a building generates noise for the nearby surrounding residents. Demolition causes excessive dust particles in the air. Asbestos may be present.	Installation and use of construction noise barriers while suggesting the top-down demolition method with movable enclosures. Construction noise barriers is a 5-10 dB(A) noise reduction while the top-down demolition method shows a noise reduction of 26 dB(A). Construction barriers is recommended to reduce dust particles from traveling great distances. The hiring of a professional company with experience in removing asbestos. The company will have insurance in asbestos pollution liability.
		SOCIOECONOMIC	,
Employment and Income Patterns	2		

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Demographic	2		
Character Changes /			
Displacement			
Environmental	2		
Justice EA Factor			
	COMM	<b>TUNITY FACILITIES AND</b>	SERVICES
Educational and	2		
Cultural Facilities			
(Access and			
Capacity)			
Commercial	2		
Facilities (Access			
and Proximity)			
Health Care / Social	2		
Services (Access			
and Capacity)			
Solid Waste	2		
Disposal and			
Recycling			
(Feasibility and			
Capacity)			
Waste Water and	2		
Sanitary Sewers			
(Feasibility and			
Capacity)			
Water Supply	2		
(Feasibility and			
Capacity)			
Public Safety -	2		
Police, Fire and			
Emergency Medical			
Parks, Open Space	2		
and Recreation			
(Access and			
Capacity)			
Transportation and	2		
Accessibility (Access			
and Capacity)			
III.		NATURAL FEATURES	
Unique Natural	2		
Features /Water			
Resources			

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Vegetation / Wildlife	2		
(Introduction,			
Modification,			
Removal, Disruption, etc.)			
Other Factors 1			
Other Factors 2			
		CLIMATE AND ENERGY	
Climate Change	2		
Energy Efficiency	2		

### **Supporting documentation**

Noise Mitigation 2.pdf

Noise Mitigation 1.pdf

2021-059 - Bayou Towers Asbestos Abatement Proposal.pdf

### **Additional Studies Performed:**

Field Inspection [Optional]: Date and completed

by:

Kelli Cunningham

2/15/2023 12:00:00 AM

Statement of Loss.pdf State Fire Marshal.pdf Photos BT.pdf

List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]:

**List of Permits Obtained:** 

Public Outreach [24 CFR 58.43]:

Cumulative Impact Analysis [24 CFR 58.32]:

Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]

No Action Alternative [24 CFR 58.40(e)]

### **Summary of Findings and Conclusions:**

### Mitigation Measures and Conditions [CFR 1505.2(c)]:

Summarized below are all mitigation measures adopted by the Responsible Entity to reduce, avoid or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure or Condition	Comments on Completed	Mitigation Plan	Complete
Hazards and Nuisances including Site Safety and Site- Generated Noise	Installation and use of construction noise barriers while suggesting the top-down demolition method with movable enclosures. Construction noise barriers is a 5-10 dB(A) noise reduction while the top-down demolition method shows a noise reduction of 26 dB(A). Construction barriers is recommended to reduce dust particles from traveling great distances. The hiring of a professional company with experience in removing asbestos. The company will have insurance in asbestos pollution liability.	Measures N/A	The mitigation plan is to hire a demolition company that utilizes the mitigation measures outlined in the environmental review.	

**Project Mitigation Plan** 

Supporting documentation on completed measures

### **APPENDIX A: Related Federal Laws and Authorities**

# **Airport Hazards**

General policy	Legislation Regulation
It is HUD's policy to apply standards to	24 CFR Part 51 Subpart D
prevent incompatible development	,
around civil airports and military airfields.	

<u>Screen Summary</u> Compliance Determination

**Supporting documentation** 

### **Coastal Barrier Resources**

General requirements	Legislation	Regulation
HUD financial assistance may not be	Coastal Barrier Resources Act	
used for most activities in units of the	(CBRA) of 1982, as amended by	
Coastal Barrier Resources System	the Coastal Barrier Improvement	
(CBRS). See 16 USC 3504 for limitations	Act of 1990 (16 USC 3501)	
on federal expenditures affecting the		
CBRS.		

**Compliance Determination** 

**Supporting documentation** 

### **Flood Insurance**

General requirements	Legislation	Regulation
Certain types of federal financial assistance may not be	Flood Disaster	24 CFR 50.4(b)(1)
used in floodplains unless the community participates	Protection Act of 1973	and 24 CFR 58.6(a)
in National Flood Insurance Program and flood	as amended (42 USC	and (b); 24 CFR
insurance is both obtained and maintained.	4001-4128)	55.1(b).

1. Does this project involve <u>financial assistance for construction, rehabilitation, or acquisition of a mobile home, building, or insurable personal property?</u>

No. This project does not require flood insurance or is excepted from flood insurance.

Yes

**Screen Summary Compliance Determination** 

**Supporting documentation** 

**Air Quality** 

General requirements	Legislation	Regulation
The Clean Air Act is administered by the U.S. Environmental Protection Agency (EPA), which sets national standards on ambient pollutants. In addition, the Clean Air Act is administered by States, which must develop State Implementation Plans (SIPs) to regulate their state air quality. Projects funded by HUD must demonstrate that they conform to the appropriate SIP.	Clean Air Act (42 USC 7401 et seq.) as amended particularly Section 176(c) and (d) (42 USC 7506(c) and (d))	40 CFR Parts 6, 51 and 93

1. Does your project include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units?

Yes

**∨**No

<u>Screen Summary</u> Compliance Determination

**Supporting documentation** 

## **Coastal Zone Management Act**

General requirements	Legislation	Regulation
Federal assistance to applicant	Coastal Zone Management	15 CFR Part 930
agencies for activities affecting	Act (16 USC 1451-1464),	
any coastal use or resource is	particularly section 307(c)	
granted only when such	and (d) (16 USC 1456(c) and	
activities are consistent with	(d))	
federally approved State		
Coastal Zone Management Act		
Plans.		

**Screen Summary** 

**Compliance Determination** 

**Supporting documentation** 

### **Contamination and Toxic Substances**

General requirements	Legislation	Regulations
It is HUD policy that all properties that are being		24 CFR 58.5(i)(2)
proposed for use in HUD programs be free of		24 CFR 50.3(i)
hazardous materials, contamination, toxic		
chemicals and gases, and radioactive		
substances, where a hazard could affect the		000000000000000000000000000000000000000
health and safety of the occupants or conflict		***************************************
with the intended utilization of the property.		***************************************

### **Endangered Species**

General requirements	ESA Legislation	Regulations
Section 7 of the Endangered Species Act (ESA)	The Endangered	50 CFR Part
mandates that federal agencies ensure that	Species Act of 1973	402
actions that they authorize, fund, or carry out	(16 U.S.C. 1531 et	
shall not jeopardize the continued existence of	seq.); particularly	2002
federally listed plants and animals or result in	section 7 (16 USC	***************************************
the adverse modification or destruction of	1536).	
designated critical habitat. Where their actions		***************************************
may affect resources protected by the ESA,		
agencies must consult with the Fish and Wildlife		-
Service and/or the National Marine Fisheries		
Service ("FWS" and "NMFS" or "the Services").		

# 1. Does the project involve any activities that have the potential to affect specifies or habitats?

No, the project will have No Effect due to the nature of the activities involved in the project.

No, the project will have No Effect based on a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office

Yes, the activities involved in the project have the potential to affect species and/or habitats.

<u>Screen Summary</u> Compliance Determination

**Supporting documentation** 

# **Explosive and Flammable Hazards**

General requirements	Legislation	Regulation
HUD-assisted projects must meet	N/A	24 CFR Part 51
Acceptable Separation Distance (ASD)		Subpart C
requirements to protect them from		·
explosive and flammable hazards.		*Committee Committee Commi

1. Is the proposed HUD-assisted project itself the development of a hazardous facility (a facility that mainly stores, handles or processes flammable or combustible chemicals such as bulk fuel storage facilities and refineries)?

√No
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Yes

<u>Screen Summary</u> Compliance Determination

**Supporting documentation** 

### **Farmlands Protection**

General requirements	Legislation	Regulation
The Farmland Protection	Farmland Protection Policy	7 CFR Part 658
Policy Act (FPPA) discourages	Act of 1981 (7 U.S.C. 4201	
federal activities that would	et seq.)	TO CONTRACT OF THE PROPERTY OF
convert farmland to		
nonagricultural purposes.		

1. Does your project include any activities, including new construction, acquisition of undeveloped land or conversion, that could convert agricultural land to a non-agricultural use?

Yes

√No

<u>Screen Summary</u> Compliance Determination

**Supporting documentation** 

Floodplain Management

General Requirements	Legislation	Regulation
Executive Order 11988,	Executive Order 11988	24 CFR 55
Floodplain Management,	distribution of the state of th	
requires federal activities to		
avoid impacts to floodplains		
and to avoid direct and		
indirect support of floodplain		
development to the extent	PROFIT TO THE PR	
practicable.	777	To the state of th

1. Do any of the following exemptions apply? Select the applicable citation? [only one selection possible]

55.12(c)(3)

55.12(c)(4)

55.12(c)(5)

55.12(c)(6)

55.12(c)(7)

55.12(c)(8)

55.12(c)(9)

55.12(c)(10)

55.12(c)(11)

✓None of the above

**Screen Summary** 

**Compliance Determination** 

**Supporting documentation** 

### **Historic Preservation**

General requirements	Legislation	Regulation
Regulations under	Section 106 of the	36 CFR 800 "Protection of Historic
Section 106 of the	National Historic	Properties"
National Historic	Preservation Act	https://www.govinfo.gov/content/pkg/CF
Preservation Act	(16 U.S.C. 470f)	R-2012-title36-vol3/pdf/CFR-2012-title36-
(NHPA) require a		vol3-part800.pdf
consultative process		
to identify historic		
properties, assess		
project impacts on		
them, and avoid,		
minimize, or mitigate		
adverse effects		

### **Noise Abatement and Control**

General requirements	Legislation	Regulation
HUD's noise regulations protect residential properties from	Noise Control Act of 1972	Title 24 CFR 51 Subpart B
excessive noise exposure. HUD	General Services Administration	
encourages mitigation as	Federal Management Circular	
appropriate.	75-2: "Compatible Land Uses at	
	Federal Airfields"	***************************************

### 1. What activities does your project involve? Check all that apply:

New construction for residential use

Rehabilitation of an existing residential property

A research demonstration project which does not result in new construction or reconstruction

An interstate land sales registration

Any timely emergency assistance under disaster assistance provision or appropriations which are provided to save lives, protect property, protect public health and safety, remove debris and wreckage, or assistance that has the effect of restoring facilities substantially as they existed prior to the disaster

None of the above

Screen Summary
Compliance Determination

**Supporting documentation** 

**Sole Source Aquifers** 

General requirements	Legislation	Regulation
The Safe Drinking Water Act of 1974	Safe Drinking Water	40 CFR Part 149
protects drinking water systems	Act of 1974 (42 U.S.C.	
which are the sole or principal	201, 300f et seq., and	
drinking water source for an area	21 U.S.C. 349)	
and which, if contaminated, would		
create a significant hazard to public		
health.		

1. Does the project consist solely of acquisition, leasing, or rehabilitation of an existing building(s)?

Yes

√No

<u>Screen Summary</u> Compliance Determination

**Supporting documentation** 

### **Wetlands Protection**

General requirements	Legislation	Regulation
Executive Order 11990 discourages direct or indirect support of new construction impacting wetlands wherever there is a practicable alternative. The Fish and Wildlife Service's National Wetlands Inventory can be used as a primary screening tool, but observed or known wetlands not indicated on NWI maps must also be processed Off-site impacts that result in draining, impounding, or destroying wetlands	Executive Order 11990	Regulation  24 CFR 55.20 can be used for general guidance regarding the 8 Step Process.

1. Does this project involve new construction as defined in Executive Order 11990, expansion of a building's footprint, or ground disturbance? The term "new construction" shall include draining, dredging, channelizing, filling, diking, impounding, and related activities and any structures or facilities begun or authorized after the effective date of the Order

√No

Yes

**Screen Summary Compliance Determination** 

**Supporting documentation** 

### Wild and Scenic Rivers Act

General requirements		Regulation
The Wild and Scenic Rivers Act provides federal protection for certain free-flowing, wild, scenic and recreational rivers designated as components or potential components of the National Wild and Scenic Rivers System (NWSRS) from the effects of construction or development.	ivers 36 87), b) and and (c))	5 CFR Part 297

### 1. Is your project within proximity of a NWSRS river?

No

Yes, the project is in proximity of a Designated Wild and Scenic River or Study Wild and Scenic River.

Yes, the project is in proximity of a Nationwide Rivers Inventory (NRI) River.

<u>Screen Summary</u> Compliance Determination

**Supporting documentation** 

### **Environmental Justice**

General requirements	Legislation	Regulation
Determine if the project	Executive Order 12898	
creates adverse environmental		
impacts upon a low-income or		
minority community. If it		
does, engage the community		
in meaningful participation		
about mitigating the impacts		
or move the project.		

HUD strongly encourages starting the Environmental Justice analysis only after all other laws and authorities, including Environmental Assessment factors if necessary, have been completed.

1. Were any adverse environmental impacts identified in any other compliance review portion of this project's total environmental review?

Yes

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<u>Screen Summary</u> Compliance Determination

**Supporting documentation** 



U.S. Department of Housing and Urban Development 451 Seventh Street, SW Washington, DC 20410 www.hud.gov espanol.hud.gov

# **Environmental Assessment Determinations and Compliance Findings** for **HUD-assisted** Projects 24 CFR Part 58

### **Project Information**

**Project Name:** 

HTHA-Bayou-Towers-Demolition

HEROS Number: 900000010309444

**Project Location:** 

7491 Park Ave, Houma, LA 70364

#### **Additional Location Information:**

The corner of Scott Lane and West Park Avenue/LA24 Latitude: 29.631130 Longitude: -90.756300

# Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

The Houma Terrebonne Housing Authority has submitted a Section 18 Demolition Application to the HUD New Orleans Public Housing Field Office and intends to demolish a thirteen story, 300-unit public housing facility known as Bayou Towers, located at 7491 West Park Avenue, Houma, LA 70364. The building was built and first occupied in 1971. The future use of the site is resale as clear, vacant land.

#### **Funding Information**

Grant Number	<b>HUD Program</b>	Program Name
LA090	Public Housing	Public Housing Capital Fund (including CFFP and other grants)

Estimated Total HUD Funded Amount:

\$1,226,000.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]:

\$3,085,500.00

### Mitigation Measures and Conditions [CFR 1505.2(c)]:

Summarized below are all mitigation measures adopted by the Responsible Entity to reduce, avoid or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

	Mitigation Measure or Condition			
Hazards and Nuisances including Site Safety and	Installation and use of construction noise barriers			

Site-Generated Noise	while suggesting the top-down demolition method with movable enclosures. Construction noise barriers is a 5-10 dB(A) noise reduction while the top-down demolition method shows a noise reduction of 26 dB(A). Construction barriers is recommended to reduce dust particles from traveling great distances. The hiring of a professional company with experience in removing asbestos. The company will have insurance in asbestos pollution liability.
Permits, reviews, and approvals	Demolition Permit

### **Project Mitigation Plan**

Nikita Gilton, Houma Housing Authority Director, will hire the company, conduct site visits, and review daily task reports.

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X	Finding of No Significant Impact [24 CFR 58.40(g)(1); 40 CFR 1508.13] The project will not result in a significant impact on the quality of human environment
	Finding of Significant Impact
Prepare	er Signature: Antonie Inch Date: 4/18/2023
Name /	Title/ Organization: Antoine Foret / / Terrebonne Parish Consolidated Government
Certifyi	ng Officer Signature: Date:
Name/	Title: GORDON E. DOVE, PARISH PRESIDENT

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environment Review Record (ERR) for the activity / project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).

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