AI 1509
1510
1511
EOC

Record of Environmental Consideration

REVISED FOR FEMA ENVIRONMENTAL -- LOUISIANA – April 2007
See 44 Code of Federal Regulation Part 10

Project Name/Number: Demolition of the Port Sulphur Lockup, the Port Sulphur Sheriff Warehouse Building, and the Job Training Partnership Act (JTPA) Domestic Violence Facility/ Construction of new Plaquemines Parish Emergency Operations Center (EOC)

AI #'s 1509,1510, 1511; PW #'s 2998, 4653, 3138

Applicant Name: Plaquemines Parish

Project Location: Coordinates for Proposed Plaquemines Parish EOC: 29.899766, -89.980096

Project Description: The Department of Homeland Security (DHS) and the White House Council on Environmental Quality (CEQ) have established Alternative Arrangements (AA) to meet the requirements of the National Environmental Policy Act (NEPA) and the CEQ Regulations for Implementing the Procedural Requirements of NEPA to Reconstruct Critical Infrastructure in the New Orleans Metropolitan Area (NOMA). The AA process will enable the Federal Emergency Management Agency, as a component of DHS, to consider the potential for significant impacts to the human environment from its approval to fund the reconstruction of critical physical infrastructure in NOMA. This proposed project meets AA qualifications for the Reconstruction of Critical Infrastructure in the NOMA. For more information visit www.fema.gov/plan/ehp/noma/index.shtm

FEMA's Environmental and Historic Preservation (EHP) Section at the Louisiana Recovery Office (LRO) has determined through its Special Considerations review that Plaquemines Parish's (applicant) public involvement process meets the requirements of the National Environmental Policy Act (NEPA) Alternative Arrangements (AA). Those requirements comply with the programmatic agreement between the CEQ, DHS and FEMA.

As part of the Greater New Orleans Area critical infrastructure, this project qualifies for expedited considerations under the AA for NEPA compliance. The AA process (www.fema.gov/plan/ehp/noma) has been activated to address the basic elements of NEPA for actions taken to restore critical infrastructure devastated by Hurricane Katrina

On August 29, 2005, Hurricane Katrina and its aftermath caused wind and flood damages to facilities located throughout Plaquemines Parish. This Record of Environmental Consideration (REC) covers the applicant's proposal to demolish three (3) Plaquemines Parish facilities, and, additionally, plans to construct a new Emergency Operations Center (EOC). The facilities proposed for demolition are the Port Sulphur Lock Up, the Port Sulphur Sheriff Warehouse Building, and the Job Training Partnership Act (JTPA) Domestic Violence Facility (see top of this page for locations/coordinates).

The proposed EOC would be installed at the new Plaquemines Parish Consolidated Government Complex in Belle Chasse, LA (see top of page for coordinates). Preliminary designs call for a three-story building that would encompass roughly 17,000 square feet and would include: a lobby area, a multi-purpose media center, a 911 call center, a command center, storage area, a kitchen, a dormitory and break areas. Additionally, two (2) parking areas and a road would be installed to provide access to the facility.

National Environmental Policy Act (NEPA) Determination

☐ Statutorily excluded from NEPA review **(Review Concluded)**
☐ Programmatic Categorical Exclusion - Category **(Review Concluded)**
☐ Categorical Exclusion - Category ___
  ☐ No Extraordinary Circumstances exist.
    Are project conditions required? ☐ Yes (see section V) ☐ No **(Review Concluded)**
  ☐ Extraordinary Circumstances exist (see Section IV).
    ☐ Extraordinary Circumstances mitigated. (See Section IV comments)
      Are project conditions required? ☐ Yes (see section V) ☐ No **(Review Concluded)**
☒ Alternative Arrangements
  ☒ Public Involvement Plan on file (see comments below)
    Are project conditions required? ☒ Yes (see section V) ☐ No **(Review Concluded)**
☐ Environmental Assessment
☐ Supplemental Environmental Assessment (Reference EA or PEA in comments)
☐ Environmental Impact Statement

Comments: Based on documentation provided by the sub-applicant, FEMA's Environmental / Historic Preservation Section and Alternatives Arrangement team determined that Plaquemines Parish provided sufficient documentation to demonstrate a satisfactory public involvement process regarding the proposed scope of work. Any changes to the scope of work will require re-submission through the state to FEMA and requires re-evaluation for compliance with national environmental policies. The applicant is responsible for obtaining and complying with all local, state and federal permits. Non-compliance with this requirement may jeopardize receipt of federal funds.

☐ Project is Non-Compliant (see attached documentation justifying selection).

Reviewer and Approvals

FEMA Environmental Reviewer:
Name: Joseph Chauvin, Environmental Protection Specialist, FEMA LRO

Signature Joseph Ch Date 7/20/2012

FEMA Environmental Liaison Officer or Delegated Approving Official:
Name: Kevin Mannie, Lead Environmental Protection Specialist, FEMA LRO

Signature Kevin Mannie Date 07/20/2012

I. Compliance Review for Environmental Laws (other than NEPA)

A. National Historic Preservation Act (NHPA)

☐ Not type of activity with potential to affect historic structures or archaeological resources **(Review Concluded)**
☐ Activity meets Programmatic Agreement. Activity meets Programmatic Allowance (date of agreement and allowance number in comments) - **Review Concluded**
☒ Applicable executed Programmatic Agreement (August 17, 2009 as amended on July 22, 2011). See project review below for historic structures and archaeological resources.
☐ Other Programmatic Agreement dated _____ applies

HISTORIC BUILDINGS AND STRUCTURES
☐ No historic properties that are listed or 50 years or older in project area. **(Review Concluded)**
☒ Building or structure 50 years or older or listed on the National Register in the project area and activity not exempt from review.
  ☒ Determination of No Historic Properties Affected (FEMA finding/SHPO/THPO concurrence on file)
    Are project conditions required? ☒ Yes (see Section V) ☐ No **(Review Concluded)**

☐ Determination of Historic Properties Affected (FEMA finding/SHPO/THPO concurrence on file)
☐ Property a National Historic Landmark and National Park Service was provided early notification during the consultation process. If not, explain in comments
☐ No Adverse Effect Determination (FEMA finding/SHPO/THPO concurrence on file)
Are project conditions required? ☐ Yes (see Section V) ☐ No **(Review Concluded)**
☐ Adverse Effect Determination (FEMA finding/SHPO/THPO concurrence on file)
☐ Resolution of Adverse Effect completed (MOA on file)
Are project conditions required ☐ Yes (see Section V) ☐ No **(Review Concluded)**

ARCHEOLOGICAL RESOURCES

☐ Project affects only previously disturbed ground – ***Review Concluded***
☒ Project affects undisturbed ground or grounds associated with a historic structure
☐ Project area has no potential for presence of archeological resources
☐ Determination of no historic properties affected (FEMA finding/SHPO/THPO concurrence on file) **(Review Concluded)**
☒ Project area has potential for presence of archeological resources
☒ Determination of no historic properties affected (FEMA finding/SHPO/THPO concurrence on file)
Are project conditions required ☒ Yes (see Section V) ☐ No **(Review Concluded)**
☐ Determination of historic properties affected
☐ NR eligible resources not present (FEMA finding/SHPO/THPO concurrence on file)
Are project conditions required ☐ Yes (see Section V) ☐ No **(Review Concluded)**
☐ NR eligible resources present in project area (FEMA finding/SHPO/THPO concurrence on file)
☐ No Adverse Effect Determination (FEMA finding/ SHPO/THPO concurrence on file)
Are project conditions required? ☐ Yes (see Section V) ☐ No **(Review Concluded)**
☐ Adverse Effect Determination (FEMA finding/SHPO/THPO concurrence on file)
☐ Resolution of Adverse Effect completed (MOA on file)
Are project conditions required? ☐ Yes (see Section V) ☐ No **(Review Concluded)**

Comment: A review of this version of this project was conducted in accordance with FEMA'a Programmatic Agreement dated August 17, 2009. FEMA has previously determined that No Historic Properties are affected by a proposed undertaking, the Plaquemines Parish Government Complex (AI 1412), proposed for this location and encompassing the current APE. SHPO concurrence with this determination was received on June 10, 2011 and the Jena Band of Choctaw Indians concurred on June 22, 2011. Based on this previous consultation, FEMA has determined that no further review of the project is necessary. The applicant must comply with the Louisiana Unmarked Human Burial Sites Preservation Act (R.S. 8:671 et seq.) and the Inadvertent Discovery Clause, which can be found under the Environmental Review NHPA conditions. Any change to the approved scope of work will require reevaluation under Section 106.
Correspondence/Consultation/References: Daphne Owens, Historic Preservation Archaeologist (CTR)

B. Endangered Species Act

☒ No listed species and/or designated critical habitat present in areas affected directly or indirectly by the Federal action. **(Review Concluded)**
☐ Listed species and/or designated critical habitat present in the areas affected directly or indirectly by the Federal action.
☐ No effect to species or designated critical habitat. (See comments for justification)
Are project conditions required? ☐ Yes (see Section V) ☐ No **(Review Concluded)**
☐ May affect, but not likely to adversely affect species or designated critical habitat (FEMA determination/USFWS/NMFS concurrence on file) **(Review Concluded)**
Are project conditions required? ☐ Yes (see Section V) ☐ No **(Review Concluded)**
☐ Likely to adversely affect species or designated critical habitat
☐ Formal consultation concluded. (Biological Assessment and Biological Opinion on file)
Are project conditions required? ☐ YES (see Section V) ☐ NO **(Review Concluded)**

Comments: Project is located in an urban or previously developed area. Neither listed species nor their habitat occur in or near this site that would be adversely impacted, thus FEMA finds there will be no effect to threatened or endangered species or critical habitat.
Correspondence/Consultation/References: U.S. Fish & Wildlife Service's IPaC website (http://ecos.fws.gov/ipac/) queried on 7/2/2012.

C. Coastal Barrier Resources Act

☒ Project is not on or connected to CBRA Unit or Otherwise Protected Area **(Review Concluded)**.
☐ Project is on or connected to CBRA Unit or Otherwise Protected Area. (FEMA determination/USFWS consultation on file)
- ☐ Proposed action an exception under Section 3505.a.6 **(Review Concluded)**
- ☐ Proposed action not excepted under Section 3505.a.6.
  Are project conditions required? ☐ YES (see Section V) ☐ NO **(Review Concluded)**

Comments: Project is not within a CBRA zone.
Correspondence/Consultation/References: Louisiana Coastal Barrier Resource System Maps referenced 7/2/2012.

D. Clean Water Act

☒ Project would not affect any waters of the U.S. **(Review Concluded)**
☐ Project would affect waters, including wetlands, of the U.S.
- ☐ Project exempted as in kind replacement or other exemption. **(Review Concluded)**
- ☐ Project requires Section 404/401 of Clean Water Act or Section 9/10 of Rivers and Harbors Act permit, including qualification under Nationwide Permits.
  Are project conditions required? ☐ YES (see Section V) ☐ NO **(Review Concluded)**

☐ Project would affect waters of the U.S. by discharging to a surface water body.

Comments: Project is unlikely to affect waters of the United States. See conditions.
Correspondence/Consultation/References: Google Earth referenced 7/2/2012.

E. Coastal Zone Management Act

☐ Project is not located in a coastal zone area and does not affect a coastal zone area **(Review concluded)**
☒ Project is located in a coastal zone area and/or affects the coastal zone
- ☐ State administering agency does not require consistency review. **(Review Concluded)**.
- ☒ State administering agency requires consistency review.
  Are project conditions required? ☒ YES (see section V) ☐ NO **(Review Concluded)**

Comments: This project is located within the Louisiana Coastal Management Zone. See conditions.
Correspondence/Consultation/References: Louisiana Coastal Zone maps queried 7/2/2012.

F. Fish and Wildlife Coordination Act

☒ Project does not affect, control, or modify a waterway/body of water. **(Review Concluded)**
☐ Project affects, controls, or modifies a waterway/body of water.
- ☐ Coordination with USFWS conducted
  - ☐ No Recommendations offered by USFWS. **(Review Concluded)**
  - ☐ Recommendations provided by USFWS.
    Are project conditions required? ☐ YES (see Section V) ☐ NO **(Review Concluded)**

Comments: Project scope does not include impoundment, diversion, control, or other modification of waters of any stream or body of water.
Correspondence/Consultation/References: Louisiana Map (http://www.lamap.doa.louisiana.gov/) queried 7/2/2012.

G. Clean Air Act

☒ Project will not result in permanent air emissions. **(Review Concluded)**
☐ Project is located in an attainment area. **(Review Concluded)**
☐ Project is located in a non-attainment area.
☐ Coordination required with applicable state administering agency.
Are project conditions required? ☐ YES (see section V) ☐ NO **(Review Concluded)**

Comments: The proposed project includes activities that would produce a minor, temporary, and localized impact on air quality from vehicle emissions and fugitive dust particles. No long-term air quality impact is anticipated. See conditions.
Correspondence/Consultation/References: EPA Region 6 Non-attainment Map referenced 7/2/2012.

H. Farmland Protection Policy Act

☒ Project will not affect undisturbed ground. **(Review Concluded)**
☐ Project has a zoning classification that is other than agricultural or is in an urbanized area. **(Review Concluded)**
☐ Project does not affect designated prime or unique farmland. **(Review Concluded)**
☐ Project causes unnecessary or irreversible conversion of designated prime or unique farmland.
☐ Coordination with Natural Resources Conservation Service required.
☐ Farmland Conversion Impact Rating, Form AD-1006, completed.
Are project conditions required? ☐ YES (see section V) ☐ NO **(Review Concluded)**

Comments: The site is located within an existing urban and developed area ROW and FPPA is precluded.
Correspondence/Consultation/References: Google Earth referenced 7/2/2012.

I. Migratory Bird Treaty Act

☐ Project not located within a flyway zone **(Review Concluded)**
☒ Project located within a flyway zone.
☒ Project does not have potential to take migratory birds **(Review Concluded)**
Are project conditions required? ☐ Yes (see section V) ☒ No **(Review Concluded)**
☐ Project has potential to take migratory birds.
☐ Contact made with USFWS
Are project conditions required? ☐ YES (see section V) ☐ NO **(Review Concluded)**

Comments: The site is an existing disturbed area with little value to migratory birds and would not be included in the USFWS migratory bird management program.
Correspondence/Consultation/References: USFWS guidance letter dated September 27, 2005.

J. Magnuson-Stevens Fishery Conservation and Management Act

☒ Project not located in or near Essential Fish Habitat **(Review Concluded)**
☐ Project located in or near Essential Fish Habitat.
☐ Project does not adversely affect Essential Fish Habitat **(Review Concluded)**
Are project conditions required? ☐ Yes (see Section V) ☐ No **(Review Concluded)**
☐ Project adversely affects Essential Fish Habitat (FEMA determination/USFWS/NMFS concurrence on file)
☐ NOAA Fisheries provided no recommendation(s) **(Review Concluded).**
Are project conditions required? ☐ Yes (see Section V) ☐ No **(Review Concluded)**
☐ NOAA Fisheries provided recommendation(s)
☐ Written reply to NOAA Fisheries recommendations completed.
Are project conditions required? ☐ YES (see Section V) ☐ NO **(Review Concluded)**

Comments: Project is not located in or near any surface waters with the potential to affect EFH species.
Correspondence/Consultation/References: Google Earth referenced 7/2/2012.

K. Wild and Scenic Rivers Act

☒ Project is not along and does not affect Wild or Scenic River (WSR) - **(Review Concluded)**
☐ Project is along or affects WSR
- ☐ Project adversely affects WSR as determined by NPS/USFS. **FEMA cannot fund the action**. (NPS/USFS/USFWS/BLM consultation on file) **(Review Concluded)**
- ☐ Project does not adversely affect WSR. (NPS/USFS/USFWS/BLM consultation on file)
  Are project conditions required? ☐ YES (see Section V) ☐ NO **(Review Concluded)**

Comments: Project is not along and does not affect a Wild or Scenic River (WSR).
Correspondence/Consultation/References: National Wild and Scenic Rivers http://www.rivers.gov/maps/zoom/conus/conus.html referenced 7/2/12.

II. Compliance Review for Executive Orders

A. E.O. 11988 - Floodplains

☐ No Effect on Floodplains/Flood levels and project outside Floodplain - **(Review Concluded)**
☒ Located in Floodplain or Effects on Floodplains/Flood levels
- ☐ No adverse effect on floodplain and not adversely affected by the floodplain. **(Review Concluded)**,
  Are project conditions required? ☐ Yes (see Section V) ☐ No **(Review Concluded)**
- ☐ Beneficial Effect on Floodplain Occupancy/Values **(Review Concluded).**
- ☒ Possible adverse effects associated with investment in floodplain, occupancy or modification of floodplain environment
  - ☒ 8 Step Process Complete - documentation on file
    Are project conditions required? ☒ YES (see Section V) ☐ NO **(Review Concluded)**
  - ☐ A Final Public Notice is required

Comments: This PW is a request for an Alternate Project, using resources from multiple donor facilities. The alternate project is for the construction of a new Emergency Operation Center for Plaquemines Parish. The proposed site is within the HSDRRS storm surges protection system, and will be located at approximately latitude 29.899766, longitude -89.980096. Per Preliminary digital Flood Insurance Rate Map (DFIRM) 22075C0040D, dated 10/30/2008, the site is in a zone AE, EL 0 feet NAVD88. As an EOC, the facility is a critical action facility, as defined at 44 Code of Federal Register (CFR), part 9.4. By Memorandum of February 17, 2012 from Frank Pagano, Mitigation Division Director of FEMA Region 6 to John Connolly, Senior Public Assistance Advisor, Louisiana Recovery Office that the 0.2% annual chance flood elevation is 10.5 feet, NAVD88. This new construction shall comply with all local codes and standard, such as the International Building Codes. Critical action components need to be elevated to or above the 0.2% annual chance (500-year) flood elevation. New construction must be compliant with current codes and standards. In compliance with EO 11988, an 8-step process showing considered alternatives was completed, is attached or on file. The applicant is required to coordinate with the local floodplain administrator regarding floodplain permit(s) prior to the start of any activities. All coordination pertaining to these activities and applicant compliance with any conditions should be documented and copies forwarded to the LA GOHSEP and FEMA for inclusion in the permanent project files. Per 44 CFR 9.11(d)(9), for the replacement of building contents, materials and equipment, where possible, disaster-proofing of the building and/or elimination of such future losses should occur by relocation of those building contents, materials and equipment outside or above the base floodplain. A Cumulative Final Public Notice was published 10/26/07 - 11/07/07, and is attached or on file.
Correspondence/Consultation/References: Alan A. Johnson, CFM, Floodplain Specialist

B. E.O. 11990 - Wetlands

☒ No Effects on Wetland(s) and/or project located outside Wetland(s) - **(Review Concluded)**
☐ Located in Wetland or effects Wetland(s)
- ☐ Beneficial Effect on Wetland - **(Review Concluded)**
- ☐ Possible adverse effect associated with constructing in or near wetland
  - ☐ Review completed as part of floodplain review
  - ☐ 8 Step Process Complete - documentation on file

Are project conditions required? ☒ YES (see Section V) ☐ NO **(Review Concluded)**

Comments: Review of the USFWS National Wetlands Inventory map for this project site indicates no mapped wetlands at or near the proposed project site.
Correspondence/Consultation/References: U.S. FWS NWI map accessed on-line 7/2/2012

C. E.O. 12898 - Environmental Justice for Low Income and Minority Populations

☒ Project scope of work has no potential to adversely impact any population **(Review Concluded)**
☐ No Low income or minority population in, near or affected by the project based on information gathered from http://factfinder.census.gov. **(Review Concluded)**
☐ Low income or minority population in or near project area
- ☐ No disproportionately high and adverse impact on low income or minority population **(Review Concluded)**
- ☐ Disproportionately high or adverse effects on low income or minority population
  Are project conditions required? ☐ YES (see Section V) ☐ NO **(Review Concluded)**

Comments: The proposed project should have no adverse, disproportionate impacts on low-income or minority populations.
Correspondence/Consultation/References: Joseph Chauvin, Environmental Protection Specialist

III. Other Environmental Issues

Identify other potential environmental concerns in the comment box not clearly falling under a law or executive order (see environmental concerns scoping checklist for guidance).

Resource Conservation and Recovery Act

Comments: Unusable equipment, debris, and material shall be disposed of in an approved manner and location. In the event significant items (or evidence thereof) are discovered during implementation of the project, applicant shall handle, manage, and dispose of petroleum products, hazardous materials (such as asbestos and lead based paint), and/or toxic waste in accordance with the requirements and to the satisfaction of the governing local, state, and federal agencies.
Correspondence/Consultation/Reference: Joseph Chauvin, Environmental Protection Specialist

Toxic Substances Control Act

This project involves the demolition, renovation, refurbishing of a public child-occupied structure and/or facility constructed prior to 1978 that may contain surfaces coated with lead-based paint (LBP).

IV. Extraordinary Circumstances

Yes

☐ (i) Greater scope or size than normally experienced for a particular category of action
☐ (ii) Actions with a high level of public controversy
☐ (iii) Potential for degradation, even though slight, of already existing poor environmental conditions;
☐ (iv) Employment of unproven technology with potential adverse effects or actions involving unique or unknown environmental risks;
☐ (v) Presence of endangered or threatened species or their critical habitat, or archaeological, cultural, historical or other protected resources;
☐ (vi) Presence of hazardous or toxic substances at levels which exceed Federal, state or local regulations or standards requiring action or attention;

- ☐ (vii) Actions with the potential to affect special status areas adversely or other critical resources such as wetlands, coastal zones, wildlife refuge and wilderness areas, wild and scenic rivers, sole or principal drinking water aquifers;
- ☐ (viii) Potential for adverse effects on health or safety; and
- ☐ (ix) Potential to violate a federal, state, local or tribal law or requirement imposed for the protection of the environment.
- ☐ (x) Potential for significant cumulative impact when the proposed action is combined with other past, present and reasonably foreseeable future actions, even though the impacts of the proposed action may not be significant by themselves.

Comments:

V. Environmental Review Project Conditions

Project Conditions:

The following conditions apply as a condition of FEMA funding reimbursement:

- In compliance with E.O. 11988, a Programmatic Statewide 8-Step process has been completed and is attached; per 44 CFR 9.12 a cumulative public notice was published from 12/08/08-12/12/08. Per 44 CFR 9.11(d)(9), the replacement of building contents, materials, and equipment, where possible, disaster proofing of the building and/or elimination of the such future losses by relocation of those building contents, materials, and equipment to or above the 500 year floodplain for critical actions. The applicant is required to coordinate and comply with the local floodplain administrator regarding floodplain permit(s) prior to the start of any activities. All coordination pertaining to these permit(s) should be documented to the local floodplain administrator and copies provided to LA GOHSEP and FEMA as part of the permanent project files.

- Unusable equipment, debris and material shall be disposed of in an approved manner and location. In the event significant items (or evidence thereof) are discovered during implementation of the project, applicant shall handle, manage, and dispose of petroleum products, hazardous materials (such as asbestos and lead based paint) and/or toxic waste in accordance to the requirements and to the satisfaction of the governing local, state and federal agencies.

- Per Clean Air Act National Emission Standards for Hazardous Air Pollutant Regulations and Louisiana Administrative Code 33:iii 5151, demolition activities related to possible asbestos-containing materials (PACM) must be inspected for ACM/PACM where it is safe to do so. ACM/PACM must be handled in accordance with local, state and federal regulations and disposed of at approved facilities that accept ACM. Demolition activity notification must be sent to the LDEQ before work begins.

- This project involves the modification of a public structure that may contain surfaces coated with lead-based paint (LBP). The applicant is responsible complying with all local, state, and federal laws and ensuring that project activities are coordinated with the Louisiana Department of Environmental Quality (LDEQ) for abatement activities.

- This project is located within the Louisiana Coastal Management Zone. The applicant must check with Louisiana Department of Natural Resources for permitting or other authorization requirements. Projects may be coordinated by contacting LDNR at 1-800-267-4019.

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

- If human bone or unmarked grave(s) are present within the project area, compliance with the Louisiana Unmarked Human Burial Sites Preservation Act (R.S. 8:671 et seq.) is required. The applicant shall notify the law enforcement agency of the jurisdiction where the remains are located within twenty-four (24) hours of the

discovery. The applicant shall also notify FEMA and the Louisiana Division of Archaeology at 225-342-8170 within seventy-two (72) hours of the discovery.

- If required by LDEQ, the applicant shall require its contractor to prepare, certify, and implement a construction storm water pollution prevention plan to prevent sediment and construction material transport from the project site (a Louisiana Pollution Discharge Elimination System [lapdes] permit will be required in accordance with the Clean Water Act and the Louisiana Clean Water Code. All coordination pertaining to these activities should be documented and copies forwarded to the state and FEMA as part of the permanent project files.