

**Appendix C**  
**Agency Correspondence**

**From:** [Linda \(Brown\) Hardy](#)  
**To:** [Pitts, Melanie](#)  
**Cc:** [Yasoob Zia](#)  
**Subject:** DEQ SOV 140110/0015 St. Bernard Manor Relocation Project  
**Date:** Monday, March 03, 2014 15:28:09

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March 3, 2014

Melanie Pitts  
Environmental Protection Specialist  
FEMA Louisiana Recovery Office  
1 Seine Court, New Orleans, LA  
70114  
[melanie.pitts@fema.dhs.gov](mailto:melanie.pitts@fema.dhs.gov)

RE: 140110/0015                      St. Bernard Manor Relocation Project  
   FEMA Funding  
   St. Bernard Parish

Dear Ms. Pitts:

The Assessment Division of the Office of Environmental Compliance has reviewed the information provided in your letter dated January 9, 2014, regarding the referenced project. Effective October 4, 2013, St. Bernard Parish was designated by EPA as an Sulfur Dioxide (SO<sub>2</sub>) nonattainment parish for the 2010 Sulfur Dioxide standard (Federal Register Volume 78, Number 150 (Monday, August 5, 2013)). As part of a nonattainment area, federal activities proposed in St. Bernard Parish may be subject to the State's general conformity regulations as promulgated under LAC 33:III.Chapter 14, Subchapter A, *Determining Conformity of General Federal Actions to State or Federal Implementation Plans*.

In order to determine if the proposed project in St. Bernard Parish is subject to the full requirements of the general conformity regulations, the project sponsor must first make a general conformity applicability determination. This determination can be made by summing the total of direct and indirect Sulfur Dioxide (SO<sub>2</sub>) emissions caused by the project. If the net total of SO<sub>2</sub> emissions is determined to be less than the prescribed *de minimis* level of 100 tons per year per pollutant, then this action will comply with the conformity provisions of Louisiana's State Implementation Plan (SIP) and the Assessment Division will not object to implementation of the project.

Please email your general conformity applicability determination to [linda.hardy@la.gov](mailto:linda.hardy@la.gov). Should you have any questions regarding state rules and regulations pertaining to general conformity, please contact me at (225) 219-3803. Thank you for affording us the opportunity to comment on the proposed action.

Sincerely,

Yasoob Zia

Environmental Scientist Senior  
Assessment Division

SOV #140110/0015

*Linda M. Hardy*

Technical Assistant to the Deputy Secretary  
Louisiana Department of Environmental Quality  
Office of the Secretary  
P.O. Box 4301  
Baton Rouge, LA 70821-4301  
Ph: (225) 219-3954  
Fax: (225) 219-3971  
Email: [linda.hardy@la.gov](mailto:linda.hardy@la.gov)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733

January 9, 2014

Melanie Pitts  
Environmental Department  
U.S. Department of Homeland Security  
Federal Emergency Management Agency  
FEMA-DR 1603/1607 LA  
1 Seine Court  
New Orleans, Louisiana 70114

Dear Ms. Pitts:

The U.S. Environmental Protection Agency (EPA) has completed your request for a solicitation of views concerning St. Bernard Manor, located in Meraux, Louisiana. The comments that follow are being provided relative to the EPA's *404(b)(1) Guidelines for Specification of Disposal Sites for Dredged or Fill Material (40 CFR Part 230)*.

Our preliminary review revealed that jurisdictional waters of the U.S. do not occur at the proposed sites. At this time, the EPA does not object to the project as proposed. Thanks for the opportunity to review the proposed project. If you have any questions or would like to discuss the issue further, please do not hesitate to contact me at (214) 665-6697.

Sincerely yours,

Raul Gutierrez, Ph.D.  
Wetlands Section  
Water Quality Protection Division

BOBBY JINDAL  
GOVERNOR



STEPHEN CHUSTZ  
SECRETARY

State of Louisiana  
DEPARTMENT OF NATURAL RESOURCES  
OFFICE OF COASTAL MANAGEMENT

01/14/2014

U.S. DEPARTMENT OF HOMELAND SECURITY - FEMA  
1 SEINE CT.  
NEW ORLEANS, LA 70114

**RE: P20140025, Solicitation of Views**  
**U.S. DEPARTMENT OF HOMELAND SECURITY - FEMA**  
**Description:** Construction of a maintenance building and multipurpose building and supporting infrastructure at St. Bernard Manor.  
**Location:** 2300 Archbishop Philip M Hannan Blvd Meraux, 70075; Lat. 29° 55' 57.06"N , Long. -89° 55' 35.08"W.  
**Saint Bernard Parish, LA**

Dear Melanie Pitts:

We have received your Solicitation of Views for the above referenced project, which has been found to be inside the Louisiana Coastal Zone. In order for us to properly review and evaluate this project, we require that a complete Coastal Use Permit Application packet (Joint Application Form, locality maps, project illustration plats with plan and cross section views, etc.) along with the appropriate application fee be submitted to our office. Using your complete application, we can provide you with an official determination, and begin the processing of any Coastal Use Permit that may be required for your project. You may obtain a free application packet by calling our office at (225) 342-7591 or (800)-267-4019, or by visiting our website at <http://www.dnr.state.la.us/crm/coastmgt/cup/cup.asp>.

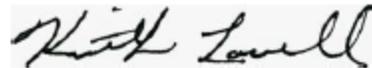
We recommend that, during your planning process, you make every effort to minimize impacts to vegetated wetlands. As our legislative mandate puts great emphasis on avoiding damages to these habitats, in many cases the negotiations involved in reducing such disturbances and developing the required mitigation to offset the lost habitat values delay permit approval longer than any other factor. Additionally, the following sensitive feature may require additional processing time by the appropriate resource agencies: The area where the project is located is all part of the aboriginal homelands of the Chitimacha Tribe of Louisiana.

Should you desire additional consultation with our office prior to submitting a formal application, we recommend that you call and schedule a pre-application meeting with our Permit Section staff. Such a preliminary meeting may be helpful, especially if a permit application that is as complete as possible is presented for evaluation at the pre-application meeting.

Post Office Box 44487 • Baton Rouge, Louisiana 70804-4487  
617 North Third Street • 10th Floor • Suite 1078 • Baton Rouge, Louisiana 70802  
(225) 342-7591 • Fax (225) 342-9439 • <http://www.dnr.louisiana.gov>  
An Equal Opportunity Employer

If you have any questions, would like to request an application packet or would like to schedule a pre-application meeting, please contact Nicole Dandurand at (225) 342-1076 or [monica.dandurand@la.gov](mailto:monica.dandurand@la.gov).

Sincerely,

A handwritten signature in black ink that reads "Keith Lovell". The signature is written in a cursive style with a light gray background behind the text.

Keith Lovell  
For Karl L. Morgan, Administrator

Keith Lovell/nd

Attachments

**Final Plats:**

- 1) [P20140025](#)    [Final Plats](#)    [01/09/2014](#)

cc: Jessica Diez, OCM w/plats  
Frank Cole, CMD/FI w/plats  
Saint Bernard Parish w/plats



REPLY TO  
ATTENTION OF

**DEPARTMENT OF THE ARMY**  
NEW ORLEANS DISTRICT, CORPS OF ENGINEERS  
P. O. BOX 80267  
NEW ORLEANS, LOUISIANA 70160-0267

**FEB 13 2014**

Operations Division  
Operations Manager,  
Completed Works

Ms. Melanie Pitts  
FEMA  
Environmental Department  
FEMA-DR 1603/1607 LA  
1 Seine Court  
New Orleans, Louisiana 70114

Dear Ms. Pitts:

This is in response to the Solicitation of Views request dated January 9, 2014, concerning the St. Bernard Manor Relocation Project, at Meraux, Louisiana, in St. Bernard Parish.

We have reviewed your request for potential Department of the Army regulatory requirements and impacts on any Department of the Army projects.

We do not anticipate any adverse impacts to any Corps of Engineers projects.

Based on review of recent maps, aerial photography, and soils data, we have determined that this property is not in a wetland subject to Corps' of Engineers jurisdiction. A Department of the Army permit under Section 404 of the Clean Water Act will not be required for the deposition or redistribution of dredged or fill material on this site.

You are advised that this 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.

Off-site locations of activities such as borrow, disposals, haul-and detour-roads and work mobilization site developments may be subject to Department of the Army regulatory requirements and may have an impact on a Department of the Army project.

Please contact Mr. Robert Heffner, of our Regulatory Branch by telephone at (504) 862-1288, or by e-mail at [Robert.A.Heffner@usace.army.mil](mailto:Robert.A.Heffner@usace.army.mil) for questions concerning wetlands determinations or need for on-site evaluations. Questions concerning regulatory permit requirements may be addressed to Mr. Michael Farabee by telephone at (504) 862-2292 or by email at [Michael.V.Farabee@usace.army.mil](mailto:Michael.V.Farabee@usace.army.mil).

Future correspondence concerning this matter should reference our account number MVN-2014-00256-SE. This will allow us to more easily locate records of previous correspondence, and thus provide a quicker response.

Sincerely,

A handwritten signature in blue ink that reads "Karen L. Clement". The signature is written in a cursive style with a large initial "K".

Karen L. Clement  
Solicitation of Views Manager



Trahan, Amy <amy\_trahan@fws.gov>

# FW: Request for Solicitation of Views (SOV) for St. Bernard Manor Relocation Project

1 message

**Pitts, Melanie** <melanie.pitts@fema.dhs.gov>

Thu, Jan 9, 2014 at 10:13 AM

To: "Amy\_Trahan@fws.gov" <Amy\_Trahan@fws.gov>

Cc: "Holmes, Leschina" <Leschina.Holmes@fema.dhs.gov>, "Spann, Tiffany" <Tiffany.Spann@fema.dhs.gov>

Homeland Security

U.S. Department of

Management Agency

Federal Emergency

FEMA-DR 1603/1607 LA

1 Seine Ct

New Orleans, LA 70114



# FEMA

This project has been reviewed for effects to Federal trust resources under our jurisdiction and currently protected by the Endangered Species Act of 1973 (Act). The project, as proposed,  
 Will have no effect on these resources.  
 Is not likely to adversely affect these resources.  
This finding fulfills the requirements under Section 7(h)(2) of the Act.

*John A. Luchs* Jan 10, 2014  
Acting Supervisor Date  
Louisiana Field Office  
U.S. Fish and Wildlife Service

January 9, 2014

Ms. Amy Trahan



BOBBY JINDAL  
GOVERNOR

State of Louisiana  
DEPARTMENT OF WILDLIFE AND FISHERIES  
OFFICE OF WILDLIFE

ROBERT J. BARHAM  
SECRETARY  
JIMMY L. ANTHONY  
ASSISTANT SECRETARY

**Date** January 10, 2014

**Name** Melanie Pitts

**Company** FEMA

**Street Address** 1 Seine Ct

**City, State, Zip** New Orleans, LA 70114

**Project** St. Bernard Manor Relocation Project

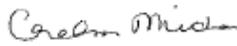
**Project ID**

**Invoice Number** 14011003

Personnel of the Habitat Section of the Coastal & Nongame Resources Division have reviewed the preliminary data for the captioned project. After careful review of our database, no impacts to rare, threatened, or endangered species or critical habitats are anticipated for the proposed project. No state or federal parks, wildlife refuges, scenic streams, or wildlife management areas are known at the specified site within Louisiana's boundaries.

The Louisiana Natural Heritage Program (LNHP) has compiled data on rare, endangered, or otherwise significant plant and animal species, plant communities, and other natural features throughout the state of Louisiana. Heritage reports summarize the existing information known at the time of the request regarding the location in question. The quantity and quality of data collected by the LNHP are dependent on the research and observations of many individuals. In most cases, this information is not the result of comprehensive or site-specific field surveys; many natural areas in Louisiana have not been surveyed. This report does not address the occurrence of wetlands at the site in question. Heritage reports should not be considered final statements on the biological elements or areas being considered, nor should they be substituted for on-site surveys required for environmental assessments. LNHP requires that this office be acknowledged in all reports as the source of all data provided here. If at any time Heritage tracked species are encountered within the project area, please contact the LNHP Data Manager at 225-765-2643. If you have any questions, or need additional information, please call 225-765-2357.

Sincerely,

  
Amity Bass, Coordinator  
Natural Heritage Program



FEMA

December 14, 2007

Pam Breaux  
State Historic Preservation Officer  
Office of Culture Recreation and Tourism  
Post Office Box 44247  
Baton Rouge, LA 70804

RE: Section 106 Review Consultation, Hurricane Katrina  
*Undertaking:* Demolition and rebuild of Archbishop Hannan Seniors Housing Complex, 2300  
Archbishop Hannan Boulevard, Meraux, Louisiana  
*Applicant:* Roman Catholic Church/Archdiocese of New Orleans  
*Finding:* **No Historic Properties Affected**

Dear Ms. Breaux:

The Federal Emergency Management Agency (FEMA) will be providing funds authorized under the Robert T. Stafford Disaster Relief and Emergency Assistance Act, P.L. 93-288, as amended, in response to the following major Disaster Declarations;

- 1) FEMA-DR-1603-LA, dated August 29, 2005, as amended
- 2) FEMA-DR-1607-LA, dated September 23, 2005.

FEMA is initiating Section 106 review for the above referenced properties in accordance with the Programmatic Agreement among FEMA, the Louisiana State Historic Preservation Officer (SHPO), the Louisiana Office of Homeland Security and Emergency Preparedness (LOHSEP) and the Advisory Council on Historic Preservation (ACHP) dated December 3, 2004. It is proposed that federal funding through FEMA's Public Assistance program be provided to the Archdiocese of New Orleans (**Applicant**) to demolish the existing structures, including removal of building foundations, and construct a new facility on the site (**Undertaking**). The total Area of Potential Effect (APE) for this undertaking is approximately 5 acres, incorporating the three seniors housing buildings and the community center (Figures 1-2). The Archdiocese of New Orleans has requested federal assistance to carry out this undertaking.

The structures do not meet the 45-year criterion, nor do they possess the level of exceptional importance required by Criteria Consideration G of the National Register guidelines to be considered eligible for the National Register of Historic Places. Upon consultation of data provided by the Louisiana SHPO, there is one archaeological site (16SB124) located within a 0.5 mile radius from the proposed project area, but it is outside the APE and will not be affected by the proposed undertaking. This area is not located within an existing or

proposed National Register Historic District. The project area falls within the Orleans Parish Moderate Probability Zone for occurrence of historic or prehistoric cultural resources. FEMA archaeologists conducted a site visit to the location on December 13, 2007. No evidence of historic or prehistoric cultural resources was noted during surface inspection of exposed/eroded areas within the APE. The structures are located in a low-lying, boggy area, and rest on artificial fill. Review of historic Mississippi River Commission maps show no development in this location until sometime after 1961. The current buildings were constructed in the late 1980's.

Based on the field inspection, the absence of archival evidence indicating any historic structures or activities in the location, and the project's setting in a low-lying area containing artificial fill, it is the recommendation of FEMA archaeologists that no historic properties or archaeological resources will be affected by the proposed undertaking. FEMA requests SHPO concurrence with its finding of "**No Historic Properties Affected.**"

Your prompt review of this project is greatly appreciated. Should you need any additional information please contact Michael Wilder, archaeologist 703-399-1839.

Sincerely,

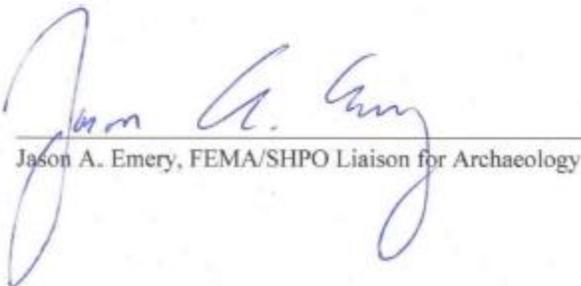


Howard R. Bush

Environmental Liaison Officer

FEMA-DR-1603-LA, FEMA-DR-1607-LA,

The FEMA/SHPO liaison concurs with the finding of **No Historic Properties Affected** as a result of this Undertaking.



---

Jason A. Emery, FEMA/SHPO Liaison for Archaeology

12/17/2007  
Date

The SHPO Reviewer for Standing Structures concurs with the finding of **No Historic Properties Affected** as a result of this Undertaking.

Derek A. Galosi For  
Michael Varnado, SHPO Reviewer for Standing Structures

12/17/07  
Date



Figure 1. Project location. Area of Potential Effect within red lines.



Figure 2. Archbishop Hannan Senior's Housing Complex and Community Center. View to the southwest.

U.S. Department of Homeland Security  
Federal Emergency Management Agency  
FEMA-1603/1607-DR-LA  
Algiers Transitional Recovery Office  
1 Seine Court, 6th floor environmental  
Algiers, Louisiana 70114



FEMA

December 14, 2007

Pam Breaux  
State Historic Preservation Officer  
Office of Culture Recreation and Tourism  
Post Office Box 44247  
Baton Rouge, LA 70804

Date: 12-27-07

No known archaeological sites or historic properties will be affected by this undertaking. This effect determination could change should new information come to our attention.

Pam Breaux  
State Historic Preservation Officer

RE: Section 106 Review Consultation, Hurricane Katrina  
*Undertaking:* Demolition and rebuild of Archbishop Hannan Seniors Housing Complex, 2300  
Archbishop Hannan Boulevard, Meraux, Louisiana  
*Applicant:* Roman Catholic Church/Archdiocese of New Orleans  
*Finding:* **No Historic Properties Affected**

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