

APPENDIX A
Figures



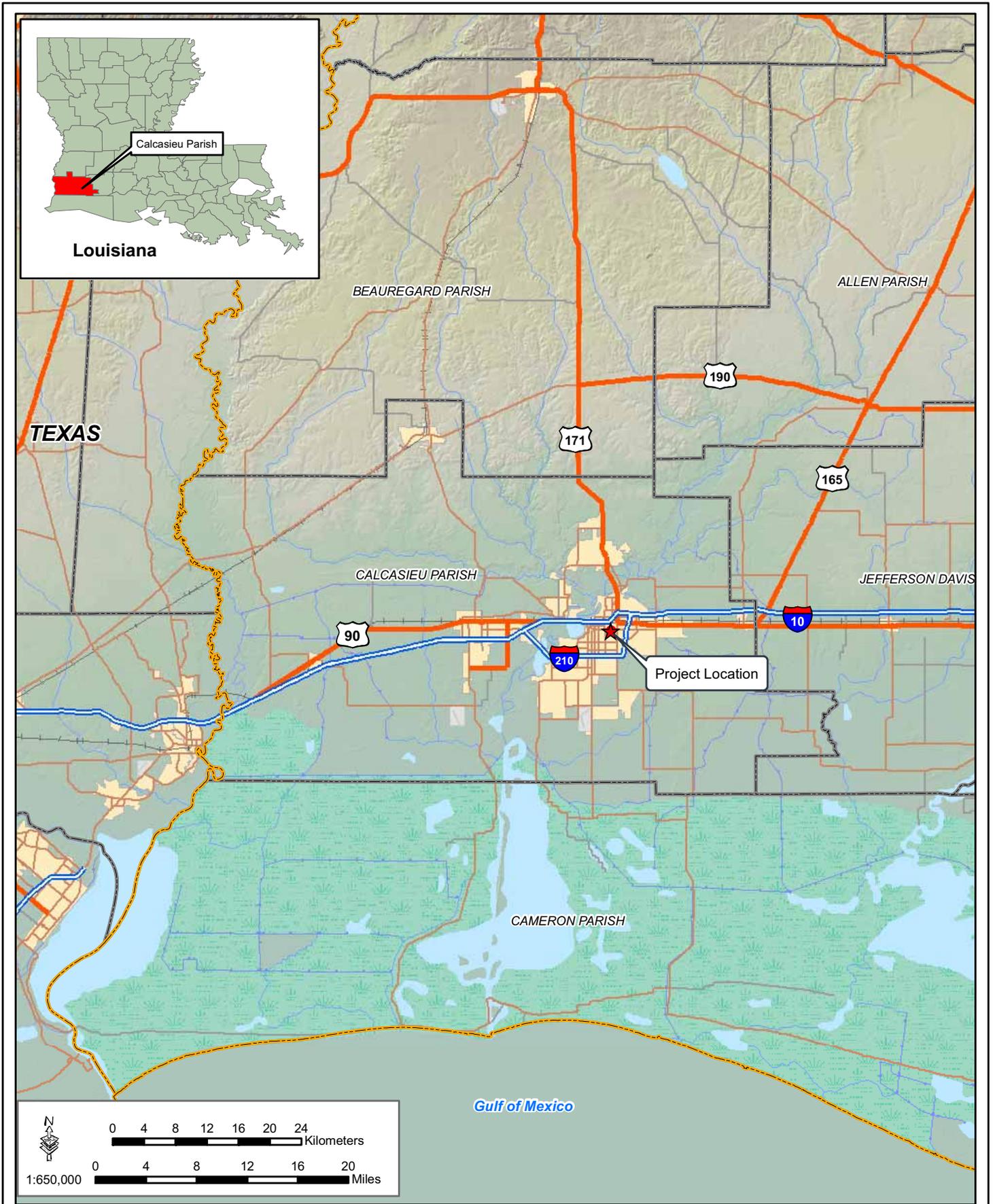


Figure 1: Vicinity Map

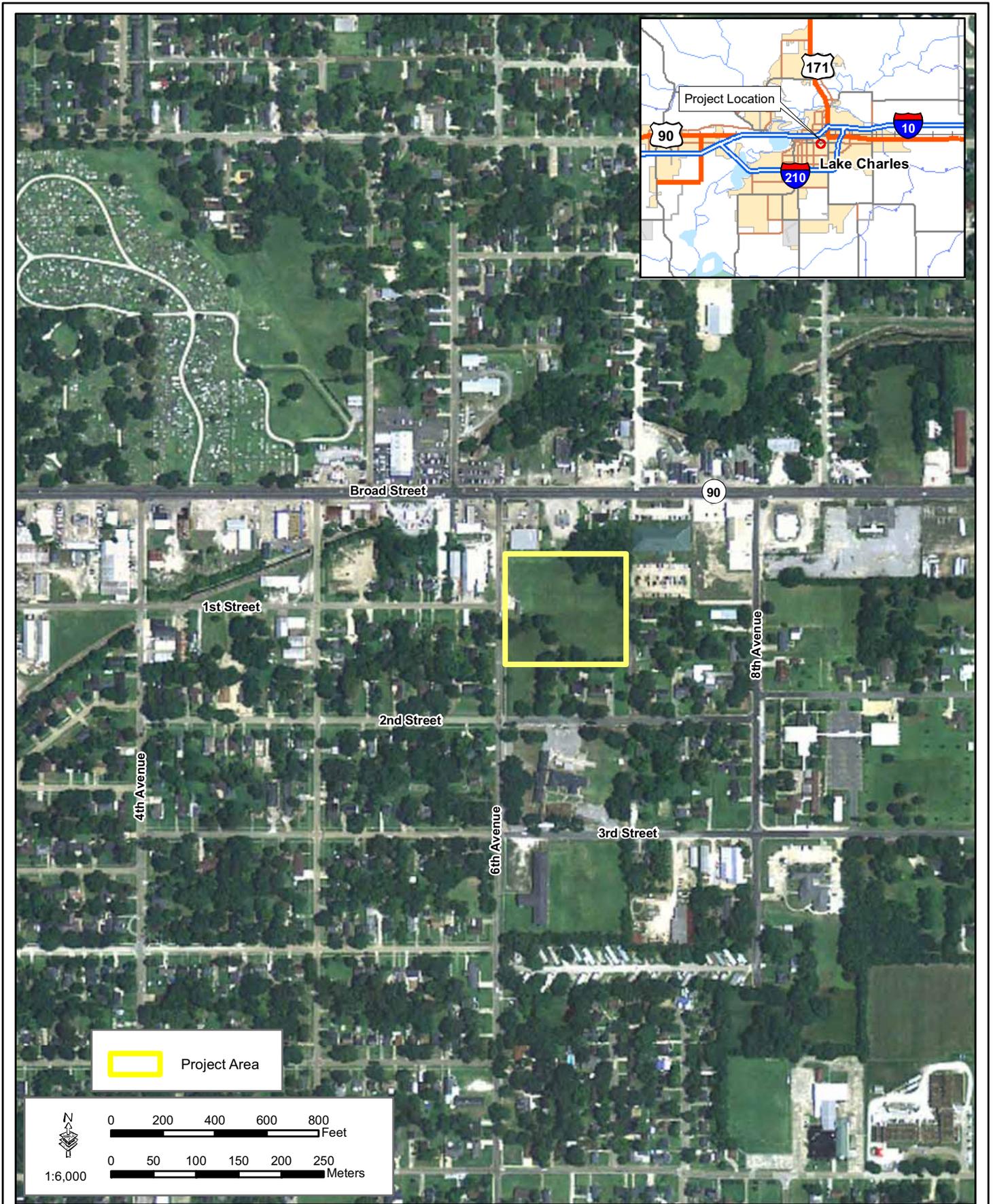


Figure 2: Project Area

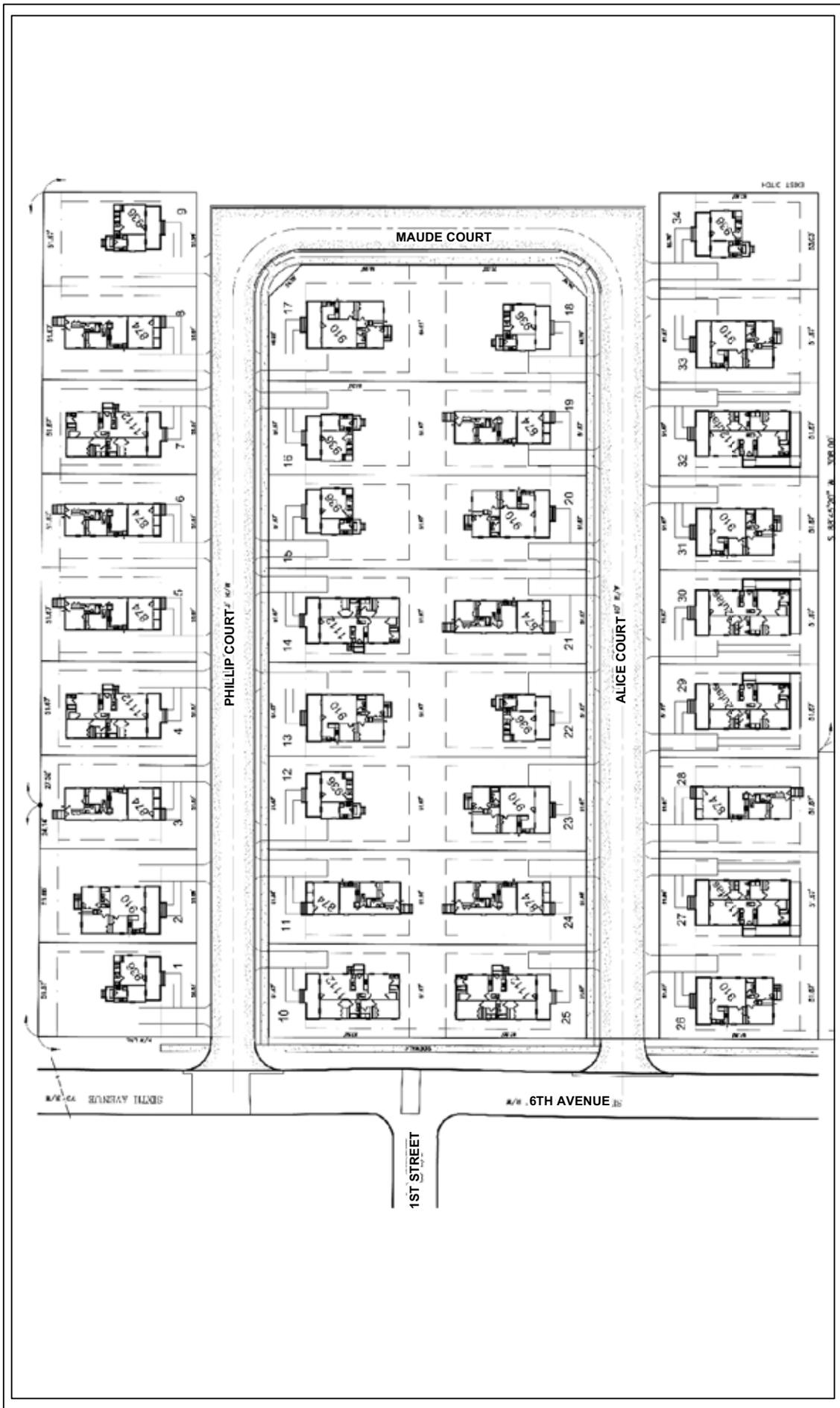


Figure 3: Draft Conceptual Site Plan

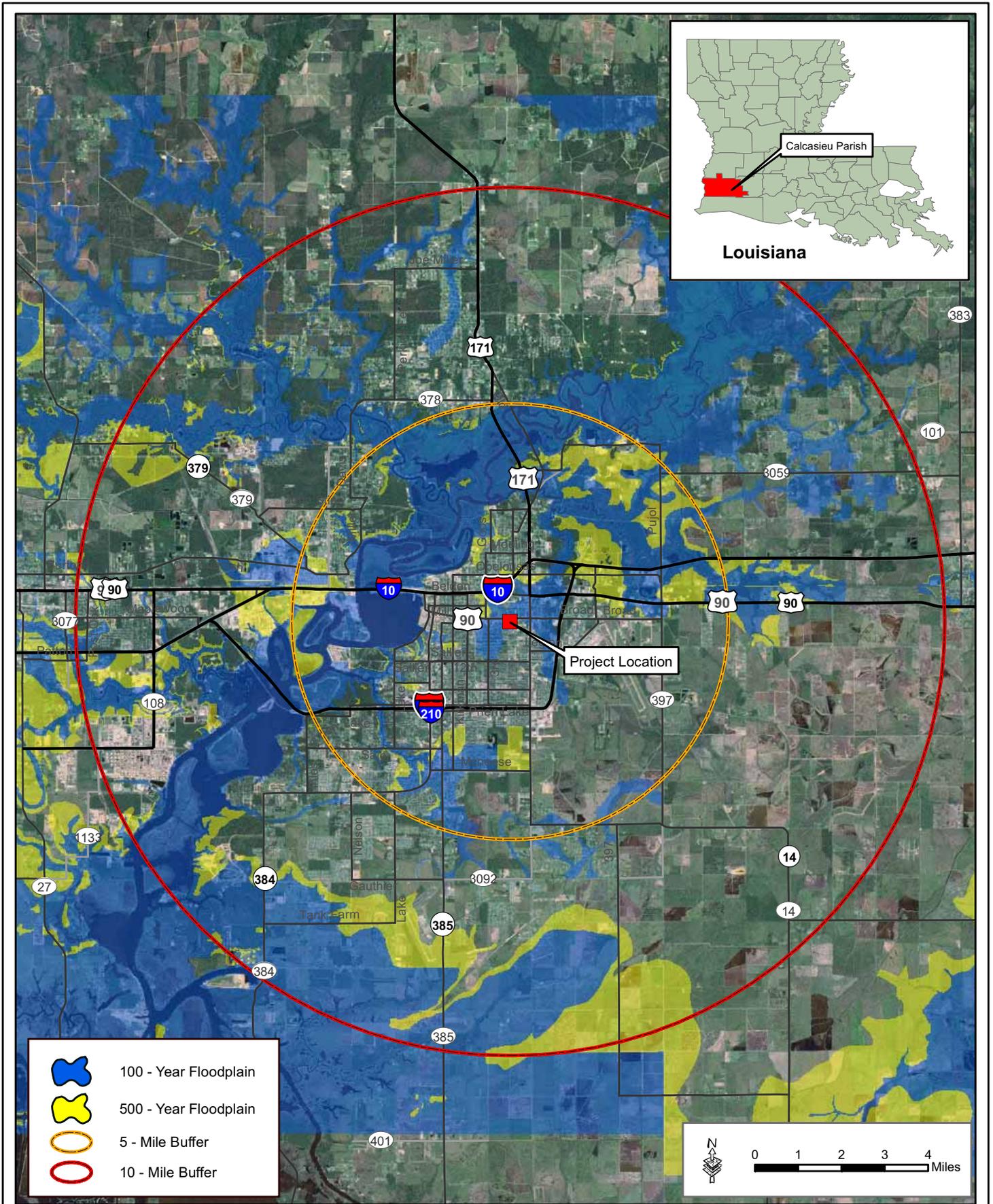


Figure 4: Lake Charles FEMA Floodplain Map

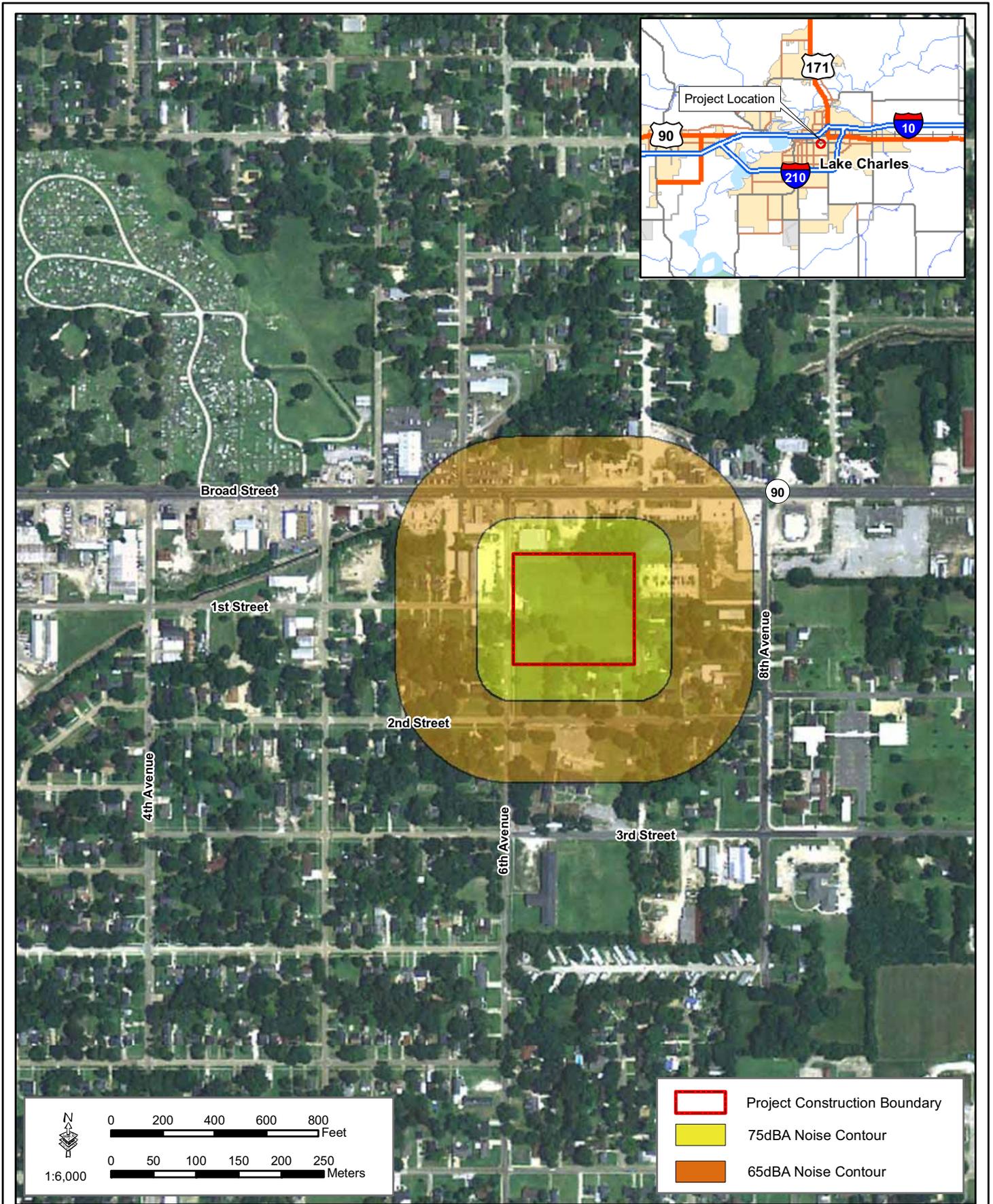


Figure 5: Lake Charles Noise Contours

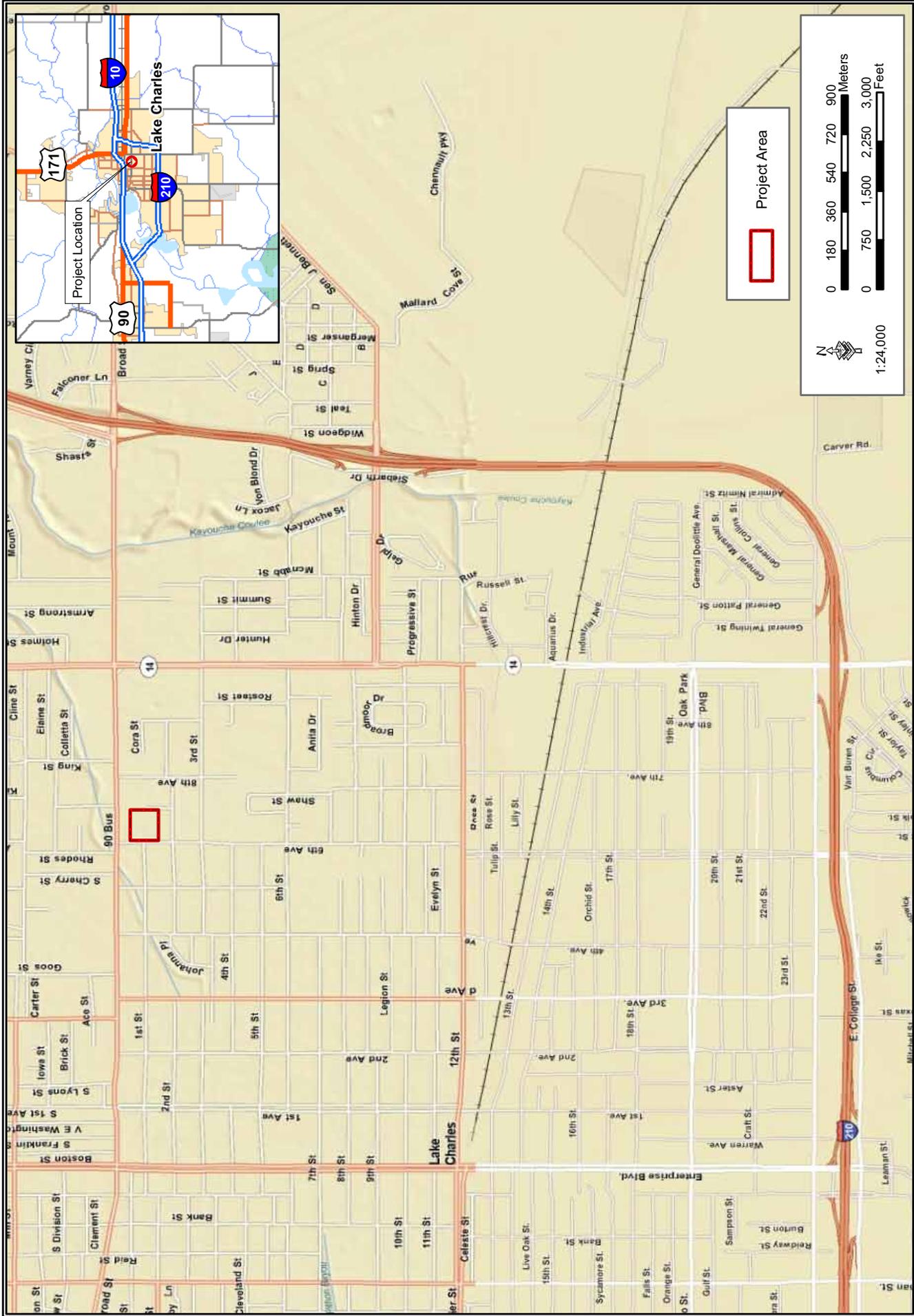


Figure 6: Lake Charles Transportation Map

APPENDIX B
Correspondence





February 11, 2009

Josh Marceaux
U.S. Fish and Wildlife Service
646 Cajundome Boulevard, Suite 400
Lafayette, LA 70506-4290

RE: Request for Project Review – Lake Charles Fields 6th Avenue Group Site,
Calcasieu Parish, Louisiana Alternative Housing Pilot Program Group Housing
Project

Dear Mr. Marceaux:

The Louisiana Recovery Authority (LRA) applied for federal funding from the Federal Emergency Management Agency (FEMA) for the purchase and construction of the Fields 6th Avenue, Calcasieu Parish, Louisiana Alternative Housing Pilot Program (AHPP) Group Housing Project.

Recognizing the extensive and complex housing challenges facing victims and communities as a result of the 2005 hurricane season and acknowledging the limitations on FEMA's 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 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 U.S. Gulf Coast region, including the State of Louisiana and Calcasieu Parish. As of January 2009, there are 144 mobile homes, 349 manufactured housing, and 25 park model houses still occupied by residents displaced by Hurricanes Katrina and Rita in Calcasieu Parish. Consequently, there maintains a need to provide a permanent housing solution.

The LRA proposes to utilize AHPP funding for the land acquisition and construction of 34 single-family, permanent housing units within an approximate 5.0-acre plot of land in Lake Charles, Calcasieu Parish, Louisiana. The proposed project site is located south of Highway 90 (Broad Street), north of 2nd Street, and east of 6th Avenue (Figure 1). The proposed site is partially bounded to the south, east and west by residential communities and to the north by commercial properties along the highway. The proposed project site consists of a previously developed subdivision with existing infrastructure including roads and municipal utility service. The proposed homesites consist of previously disturbed land, which has been filled, cleared, and graded and is predominately re-vegetated with grasses.

The proposed AHPP units are designed in the Louisiana Cottage-style and would consist of a mixture of units with living areas ranging from 888 square feet to 1,112 square feet. Project activities would include minimal grading, the tie-in of utilities to the cottages from existing lot site utilities, and the construction of driveways. Access to the proposed development would be from 6th Avenue. A site plan for the project is provided in Figure 2. The proposed site is within the 100 year floodplain and the base flood elevation (BFE) is approximately 13 feet above mean sea level. As required by the City of Lake Charles, the AHPP units would be built above the BFE. The proposed area has been previously developed and during that development fill material was used to elevate the Fields 6th Avenue homesites at or near the BFE. All AHPP cottage units would be installed on piers to ensure the BFE is met should the current development's elevation not be adequate to meet the BFE. FEMA is currently evaluating the potential floodplain impacts through both the NEPA process and the Eight-Step Planning Process as described in 44 Code of Federal Regulations Part 9, to ensure that its actions are consistent with Executive Order 11988.

Gulf South Research Corporation (GSRC) has been retained by FEMA to prepare an Environmental Assessment (EA) for the proposed project. In compliance with the National Environmental Policy Act (NEPA) of 1969, as amended, GSRC requests that your agency review the proposed project and provide comments and any available information or resources under your agency's jurisdiction within the project area. If you have any questions or need additional information, please contact Denise Rousseau Ford by phone: (225) 757-8088, email: dford@gsrcorp.com, or by Fax: (225) 761-8077.

Sincerely,



Denise Rousseau Ford
Project Manager

enclosures

RE: 80420001s

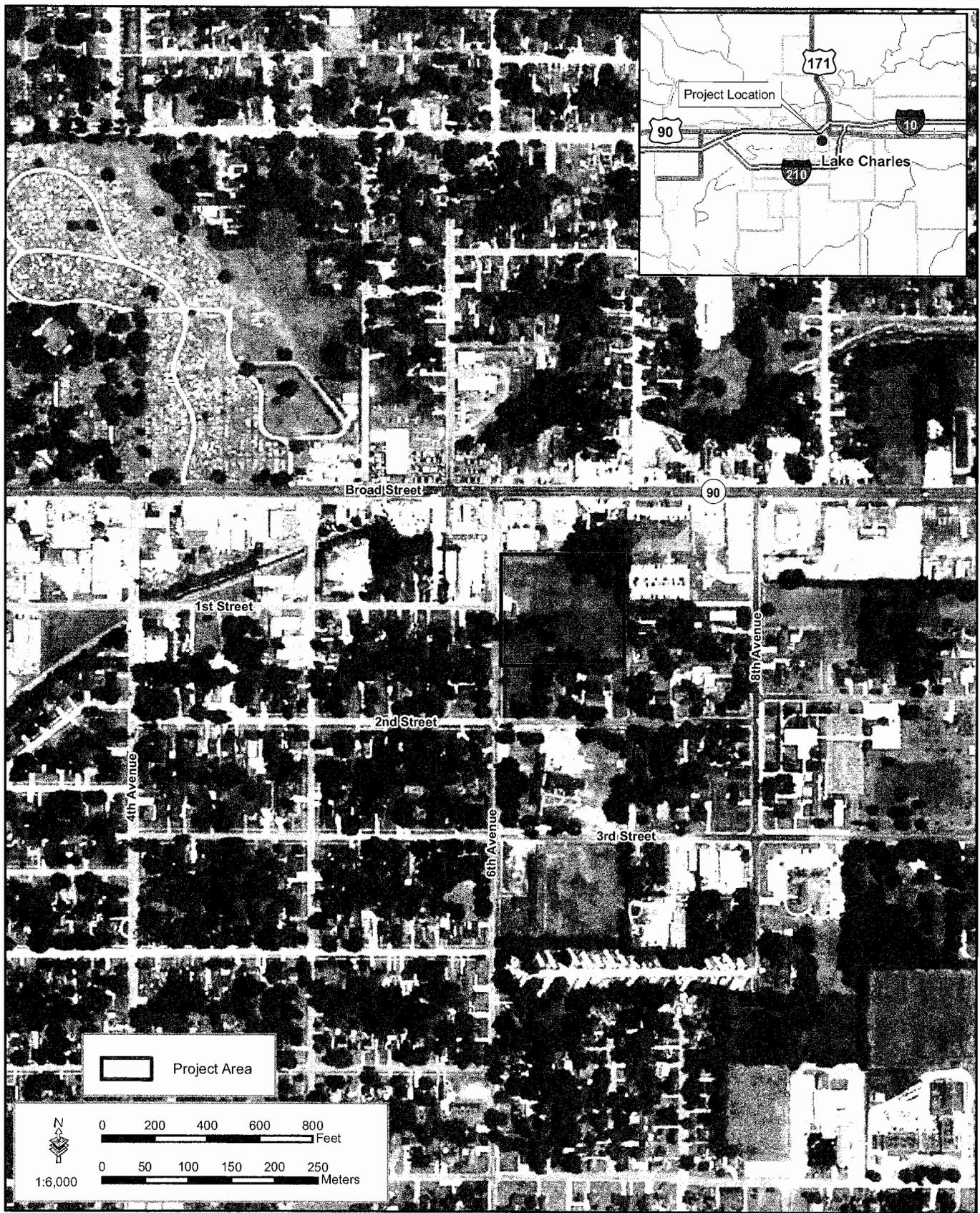


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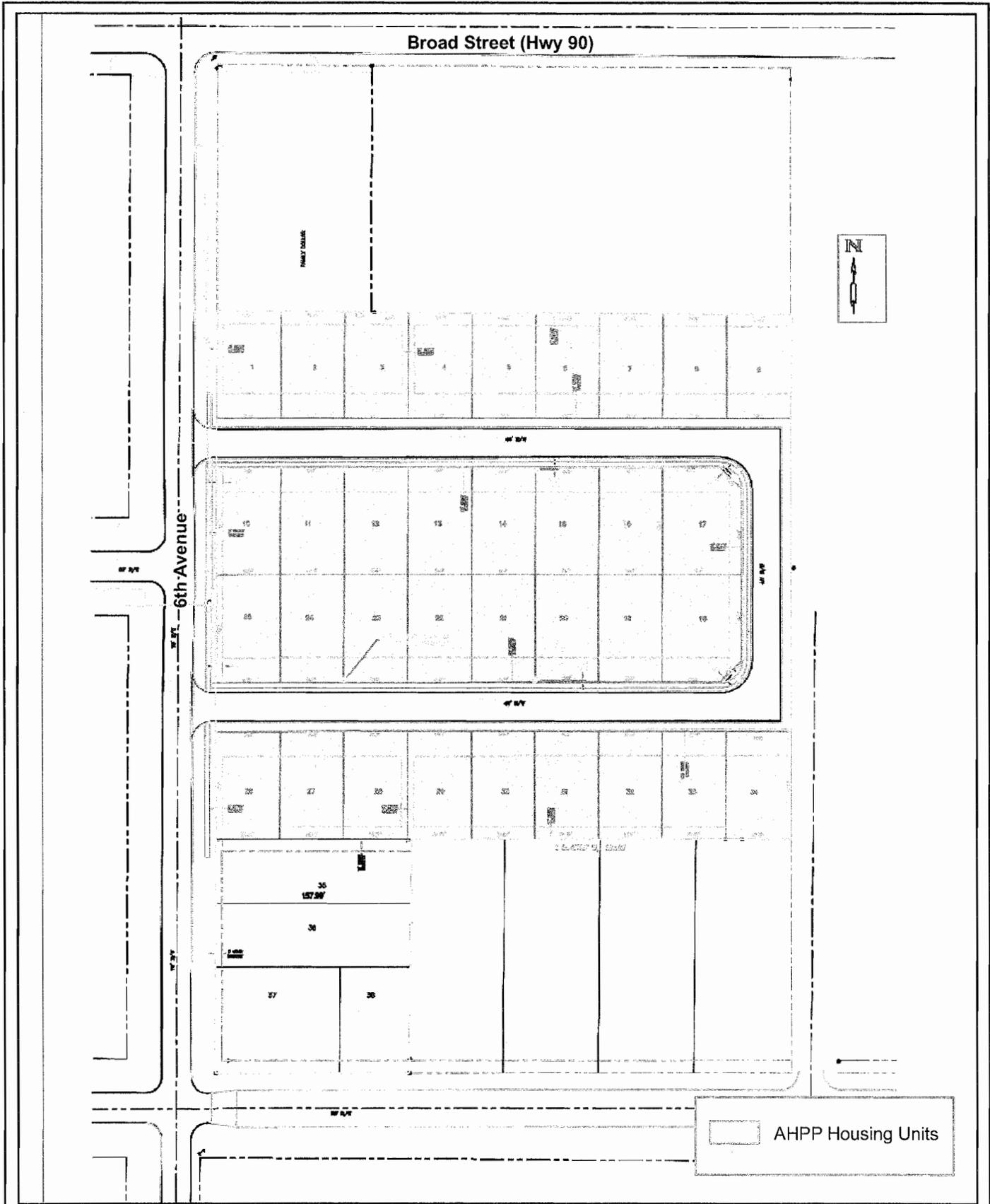


Figure 2: AHPP Housing Units



February 11, 2009

Richard Hartman
National Oceanic and Atmospheric Administration
NMFS CASC Route: Atmospheric Administration C/O LSU Center for Wetland Research
Baton Rouge, LA 70803-7535

RE: Request for Project Review – Lake Charles Fields 6th Avenue Group Site,
Calcasieu Parish, Louisiana Alternative Housing Pilot Program Group Housing
Project

Dear Mr. Hartman:

The Louisiana Recovery Authority (LRA) applied for federal funding from the Federal Emergency Management Agency (FEMA) for the purchase and construction of the Fields 6th Avenue, Calcasieu Parish, Louisiana Alternative Housing Pilot Program (AHPP) Group Housing Project.

Recognizing the extensive and complex housing challenges facing victims and communities as a result of the 2005 hurricane season and acknowledging the limitations on FEMA's 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 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 U.S. Gulf Coast region, including the State of Louisiana and Calcasieu Parish. As of January 2009, there are 144 mobile homes, 349 manufactured housing, and 25 park model houses still occupied by residents displaced by Hurricanes Katrina and Rita in Calcasieu Parish. Consequently, there maintains a need to provide a permanent housing solution.

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Sincerely,



Denise Rousseau Ford
Project Manager

enclosures

RE: 80420001s



February 11, 2009

Tammy Mick
U.S. Environmental Protection Agency
Fountain Place 11th Floor, MC 6WQ
Dallas, TX 75202-2733

RE: Request for Project Review – Lake Charles Fields 6th Avenue Group Site,
Calcasieu Parish, Louisiana Alternative Housing Pilot Program Group Housing
Project

Dear Ms. Mick:

The Louisiana Recovery Authority (LRA) applied for federal funding from the Federal Emergency Management Agency (FEMA) for the purchase and construction of the Fields 6th Avenue, Calcasieu Parish, Louisiana Alternative Housing Pilot Program (AHPP) Group Housing Project.

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Sincerely,



Denise Rousseau Ford
Project Manager

enclosures

RE: 80420001s



February 11, 2009

Amy Powell
U.S. Army Corps of Engineers, New Orleans District
PO Box 60267
New Orleans, LA 70160

RE: Request for Project Review – Lake Charles Fields 6th Avenue Group Site,
Calcasieu Parish, Louisiana Alternative Housing Pilot Program Group Housing
Project

Dear Ms. Powell:

The Louisiana Recovery Authority (LRA) applied for federal funding from the Federal Emergency Management Agency (FEMA) for the purchase and construction of the Fields 6th Avenue, Calcasieu Parish, Louisiana Alternative Housing Pilot Program (AHPP) Group Housing Project.

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Sincerely,



Denise Rousseau Ford
Project Manager

enclosures

RE: 80420001s



February 11, 2009

Quin Kinler
Soil Conservationist
Natural Resource Conservation Services
Parker Coliseum, LSU Campus
Baton Rouge, LA 70893

RE: Request for Project Review – Lake Charles Fields 6th Avenue Group Site,
Calcasieu Parish, Louisiana Alternative Housing Pilot Program Group Housing
Project

Dear Mr. Kinler:

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Sincerely,



Denise Rousseau Ford
Project Manager

enclosures

RE: 80420001s



February 11, 2009

Kyle Balkum
Louisiana Department of Wildlife and Fisheries
2000 Quail Drive
Baton Rouge, LA 70808

RE: Request for Project Review – Lake Charles Fields 6th Avenue Group Site,
Calcasieu Parish, Louisiana Alternative Housing Pilot Program Group Housing
Project

Dear Mr. Balkum:

The Louisiana Recovery Authority (LRA) applied for federal funding from the Federal Emergency Management Agency (FEMA) for the purchase and construction of the Fields 6th Avenue, Calcasieu Parish, Louisiana Alternative Housing Pilot Program (AHPP) Group Housing Project.

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Sincerely,



Denise Rousseau Ford
Project Manager

enclosures

RE: 80420001s



February 11, 2009

Jamie Phillippe
Louisiana Department of Environmental Quality
PO Box 4313
Baton Rouge, LA 70821-4313

RE: Request for Project Review – Lake Charles Fields 6th Avenue Group Site,
Calcasieu Parish, Louisiana Alternative Housing Pilot Program Group Housing
Project

Dear Mr. Phillippe:

The Louisiana Recovery Authority (LRA) applied for federal funding from the Federal Emergency Management Agency (FEMA) for the purchase and construction of the Fields 6th Avenue, Calcasieu Parish, Louisiana Alternative Housing Pilot Program (AHPP) Group Housing Project.

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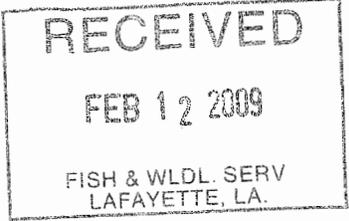


Denise Rousseau Ford
Project Manager

enclosures

RE: 80420001s

Page



February 11, 2009

Josh Marceaux
U.S. Fish and Wildlife Service
646 Cajundome Boulevard, Suite 400
Lafayette, LA 70506-4290

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 those resources
 Is not likely to adversely affect those resources.
This finding fulfills the requirements under Section 7(e)(2) of the Act.

Daniel Fuller Feb 17, 2009
Acting Supervisor Date
Louisiana Field Office
U.S. Fish and Wildlife Service

RE: Request for Project Review – Lake Charles Fields 6th Avenue Group Site, Calcasieu Parish, Louisiana Alternative Housing Pilot Program Group Housing Project

Dear Mr. Marceaux:

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Josh Marceaux
February 11, 2009
Page 2

The LRA proposes to utilize AHPP funding for the land acquisition and construction of 34 single-family, permanent housing units within an approximate 5.0-acre plot of land in Lake Charles, Calcasieu Parish, Louisiana. The proposed project site is located south of Highway 90 (Broad Street), north of 2nd Street, and east of 6th Avenue (Figure 1). The proposed site is partially bounded to the south, east and west by residential communities and to the north by commercial properties along the highway. The proposed project site consists of a previously developed subdivision with existing infrastructure including roads and municipal utility service. The proposed homesites consist of previously disturbed land, which has been filled, cleared, and graded and is predominately re-vegetated with grasses.

The proposed AHPP units are designed in the Louisiana Cottage-style and would consist of a mixture of units with living areas ranging from 888 square feet to 1,112 square feet. Project activities would include minimal grading, the tie-in of utilities to the cottages from existing lot site utilities, and the construction of driveways. Access to the proposed development would be from 6th Avenue. A site plan for the project is provided in Figure 2. The proposed site is within the 100 year floodplain and the base flood elevation (BFE) is approximately 13 feet above mean sea level. As required by the City of Lake Charles, the AHPP units would be built above the BFE. The proposed area has been previously developed and during that development fill material was used to elevate the Fields 6th Avenue homesites at or near the BFE. All AHPP cottage units would be installed on piers to ensure the BFE is met should the current development's elevation not be adequate to meet the BFE. FEMA is currently evaluating the potential floodplain impacts through both the NEPA process and the Eight-Step Planning Process as described in 44 Code of Federal Regulations Part 9, to ensure that its actions are consistent with Executive Order 11988.

Gulf South Research Corporation (GSRC) has been retained by FEMA to prepare an Environmental Assessment (EA) for the proposed project. In compliance with the National Environmental Policy Act (NEPA) of 1969, as amended, GSRC requests that your agency review the proposed project and provide comments and any available information or resources under your agency's jurisdiction within the project area. If you have any questions or need additional information, please contact Denise Rousseau Ford by phone: (225) 757-8088, email: dford@gsrcorp.com, or by Fax: (225) 761-8077.

Sincerely,



Denise Rousseau Ford
Project Manager

enclosures

RE: 80420001s

February 12, 2009



FEMA

Mr. Scott Hutcheson
State Historic Preservation Officer
Office of Culture, Recreation and Tourism
Post Office Box 44247
Baton Rouge, LA 70804

RE: Section 106 Review Consultation, Hurricanes Rita and Katrina

Undertaking: Construction of Alternate Housing Pilot Program Housing, Lake Charles Fields 6th Avenue Group Site, Calcasieu Parish, Louisiana

Determination: No Historic Properties Affected

Dear Mr. Hutcheson:

The Louisiana Recovery Authority (LRA) applied for federal funding from the Federal Emergency Management Agency (FEMA) for the purchase and construction of the Lake Charles Fields 6th Avenue, Calcasieu Parish, Louisiana Alternative Housing Pilot Program (AHPP) Group Housing Project.

Recognizing the extensive and complex housing challenges facing victims and communities as a result of the 2005 hurricane season and acknowledging the limitations on FEMA's 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 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 U.S. Gulf Coast region, including the State of Louisiana and Calcasieu Parish. As of January 2009, there are 144 mobile homes, 349 manufactured housing, and 25 park model houses still occupied by residents displaced by Hurricanes Katrina and Rita in Calcasieu Parish. Consequently, there maintains a need to provide a permanent housing solution.

The LRA proposes to utilize AHPP funding for the land acquisition and construction of 34 single-family, permanent housing units within an approximate 5.0-acre plot of land in Lake Charles, Calcasieu Parish, Louisiana. The proposed 5.0-acre Area of Potential Effect (APE) is located south of Highway 90 (Broad Street), north of 2nd Street, and east of 6th Avenue (Figure 1). The

APE is partially bounded to the south, east, and west by residential communities and to the north by commercial properties along the highway. The APE consists of a previously developed subdivision with existing infrastructure including roads and municipal utility service. The proposed homesites consist of previously disturbed land, which has been filled, cleared, and graded and is predominately re-vegetated with grasses.

The proposed AHPP units are designed in the Louisiana Cottage-style and would consist of a mixture of units with living areas ranging from 888 square feet to 1,112 square feet. Project activities would include minimal grading, the tie-in of utilities to the cottages from existing lot site utilities, and the construction of driveways. Access to the proposed development would be from 6th Avenue. A site plan for the project is provided in Figure 2. The proposed site is within the 100 year floodplain, and the base flood elevation (BFE) is approximately 13 feet above mean sea level. As required by the City of Lake Charles, the AHPP units would be built above the BFE. The proposed area has been previously developed and during that development fill material was used to elevate the Fields 6th Avenue homesites at or near the BFE. All AHPP cottage units would be installed on piers to ensure the BFE is met, should the current development's elevation not be adequate to meet the BFE.

FEMA is initiating Section 106 review in accordance with the Programmatic Agreement between 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.

A records search for previously reported sites and cultural resources surveys within one-mile of the proposed project area was conducted at the Louisiana Division of Archaeology in Baton Rouge, Louisiana. One archaeological survey conducted by Parsons Engineering (1998) for the Department of the Army was conducted within one-mile of the project area and reported no cultural resources. Additionally, the records search revealed no archeological sites or historic districts reported within one-mile of the project area. Within the City of Lake Charles, there are 11 National Register of Historic Places (NRHP)-registered properties and one historic district (Charpentier Historic District), however, none of the NRHP-listed structures are within 1 mile of the proposed project site. The closest is McNeese State University Auditorium which is approximately 3.4 miles away from the proposed project area (National Park Service 2008).

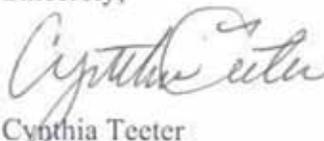
A site visit was conducted on January 28, 2009 by a Secretary of Interior qualified archeologist. It was noted that the landscape was highly disturbed in the process of the subdivision construction. No historic structures or other cultural resources were observed on the properties or in the immediate vicinity. If cultural resources ever were located on the proposed project property they were likely disturbed by the previous development episode. The likelihood of the ground disturbance required by the proposed action to impact intact cultural resources is minimal. The adjoining neighborhood consists of homes and commercial buildings of mixed construction ages. Within the view shed of the project area, defined as line of sight, the commercial buildings are of modern construction age. Older homes within view shed of the property are in excess of 50 years in age and fall within the Craftsman architectural style inspired by the Arts and Crafts Movement

of the early to mid 20th century. Houses of this style are very common to the area and have been well documented. These older houses within the viewshed are not eligible for the NRHP.

In the event that archaeological deposits, including but not limited to any Native American ceramics, stone tools, historic artifacts or human remains, are uncovered during the undertaking, the project would be halted. The contractor would stop all work immediately in the vicinity of the discovery and take reasonable measures to avoid or minimize harm to the finds. All archaeological findings would be secured and access to the sensitive area restricted. The contractor would inform FEMA immediately, and FEMA would consult with the SHPO or THPO and interested tribes. Work in sensitive areas would not resume until consultation is completed and appropriate measures have been taken to ensure that the project is in compliance with the National Historic Preservation Act (NHPA). As a result no impacts to cultural resources are expected.

Gulf South Research Corporation (GSRC) has been retained by FEMA to prepare an Environmental Assessment (EA) for the proposed project. In compliance with the National Environmental Policy Act (NEPA) of 1969, as amended, GSRC requests that your agency review the proposed project and FEMA requests concurrence with its finding of "No Historic Properties Affected". If you have any questions or need additional information, please contact Cynthia Teeter with FEMA by email Cynthia.Teeter@dhs.gov, or by Fax: (504) 762-2670.

Sincerely,



Cynthia Teeter
FEMA Deputy Environmental Liaison Officer
FEMA/State Transitional Recovery Office
1250 Poydras
New Orleans, LA 70113

Sources cited:

National Park Service. 2008. National Register Information System (online resource) Internet URL: <http://www.nr.nps.gov/>. Last Accessed: November 2008.

Parsons Engineering Science. 1998. Archaeological Phase I Survey of Eight 90th Regional Support Command Facilities in Louisiana. Department of the Army 90th Regional Support Command, Office of the Engineer, Camp Pike Armed Forces Reserve, North Little Rock, Arkansas and Detachment 1/Human Systems Center, Occupational Environmental Health Directorate, Brooks Air Force Base, Texas.

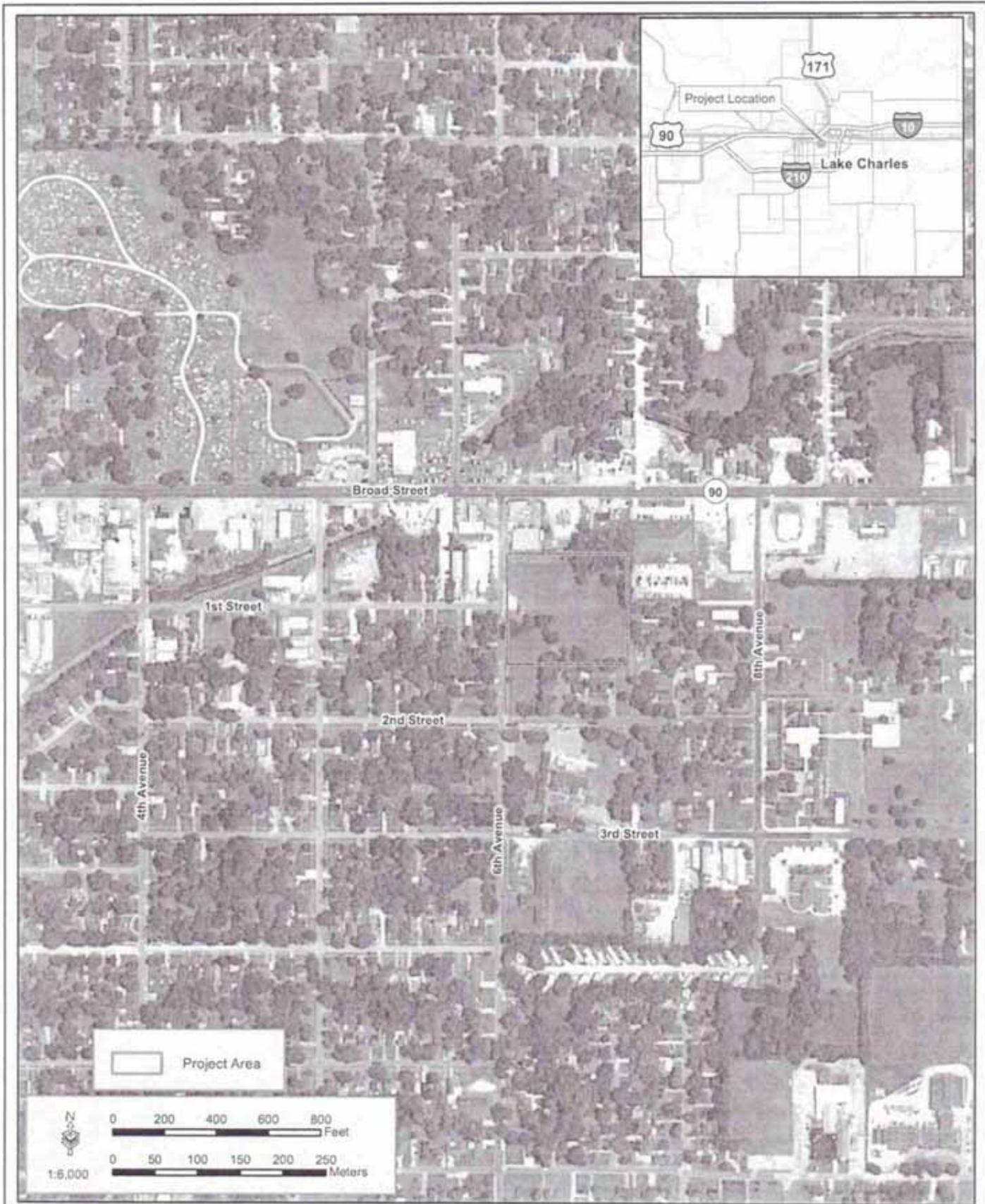


Figure 1: Project Area

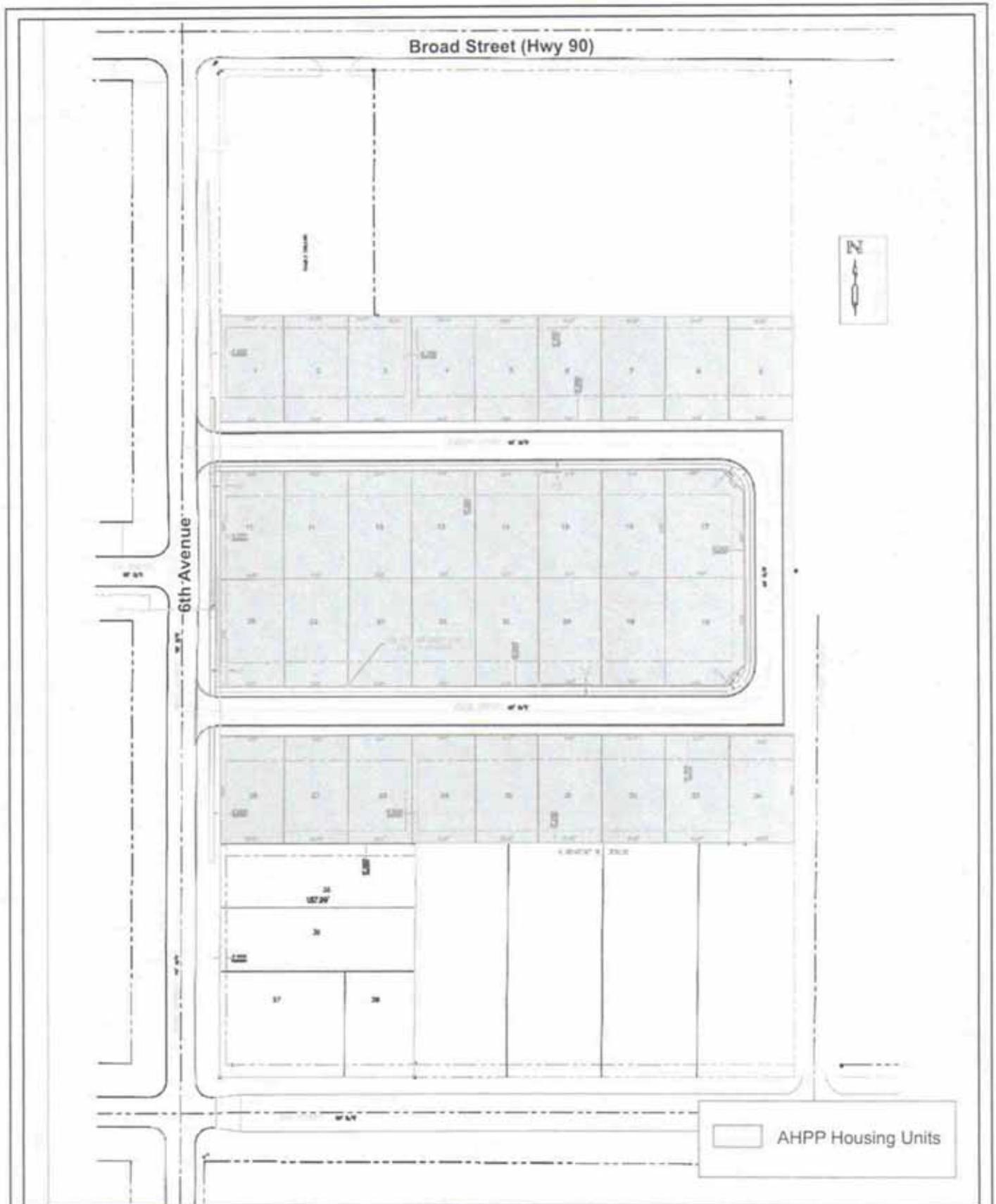


Figure 2: AHPP Housing Units

**Federal Emergency Management Agency
PUBLIC NOTICE
Notice of Availability of the Draft Environmental Assessment
for the Alternative Housing Pilot Program
Lake Charles Fields 6th Avenue Group Housing Site, Calcasieu Parish, Louisiana**

Interested persons are hereby notified that the Federal Emergency Management Agency (FEMA) has prepared a draft Environmental Assessment (EA) to address the potential impacts on the human and natural environment resulting from FEMA's proposed implementation to provide permanent housing to displaced residents of Calcasieu Parish and other nearby southwestern parishes within Louisiana through the Alternative Housing Pilot Program (AHPP).

Background

Recognizing the extensive and complex housing challenges facing victims and communities as a result of Hurricanes Katrina and Rita, and acknowledging the limitations on FEMA's 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 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 a combination of mobile homes 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 Louisiana.

The Louisiana Recovery Authority (LRA) has applied for FEMA funding under the AHPP to provide a permanent housing solution for eligible applicant families displaced by Hurricanes Katrina and Rita. In efforts to provide permanent housing solutions in the southwestern Louisiana parishes and specifically Calcasieu Parish, the LRA proposes the construction of 34 Louisiana Cottage units in the Fields 6th Avenue Subdivision, an approximate 5-acre plot of land within the City of Lake Charles. The proposed project area is bordered on the west by 6th Avenue, on the north by commercial properties along Broad Street (Highway 90), on the east by 7th Avenue; and on the south by 2nd Street. The proposed project would place the AHPP cottages in a previously developed neighborhood with working utilities.

As required by the National Environmental Policy Act (NEPA) and FEMA's regulations implementing NEPA, FEMA has prepared a draft EA to evaluate the potential impacts on the environment of alternatives for implementing this project.

The draft EA may be viewed and downloaded on FEMA's website at <http://www.fema.gov/plan/ehp/envdocuments/ea-region6.shtm>. The draft EA will also be available at the following public library in Lake Charles, Louisiana.

Carnegie Memorial Library
411 Pujos Street
Lake Charles, Louisiana 70605
Phone: (337) 721-7084

To request a hard copy, please contact via fax to the number below.

The 15-day comment period will start on February 20, 2009 and end on March 6, 2009. Written comments on the draft EA may be submitted by mail or fax to FEMA as follows:

Cynthia Teeter
FEMA Deputy Environmental Liaison Officer
FEMA Transitional Recovery Officer
Environmental and Historic Preservation
1250 Poydras, 14th Floor
New Orleans, LA 70114
FAX: (504) 762-2527



BOBBY JINDAL
GOVERNOR

State of Louisiana
DEPARTMENT OF WILDLIFE AND FISHERIES
OFFICE OF WILDLIFE

ROBERT J. BARHAM
SECRETARY
JIMMY L. ANTHONY
ASSISTANT SECRETARY

Date February 26, 2009

Name Denise Rousseau Ford

Company Gulf South Research Corporation

Street Address 8081 GSRI Avenue

City, State, Zip Baton Rouge, LA 70820

Project Louisiana Alternative Housing Pilot Program Group Housing Project
Lake Charles Fields 6th Avenue Group Site
Calcasieu Parish, LA

Project ID

Invoice Number 09022623

Personnel of the Habitat Section of the Coastal & Non-Game 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,

for 
Gary Lester, Coordinator
Natural Heritage Program



DEPARTMENT OF THE ARMY
NEW ORLEANS DISTRICT, CORPS OF ENGINEERS
P. O. BOX 60267
NEW ORLEANS, LOUISIANA 70160-0267

REPLY TO
ATTENTION OF

FEB 27 2009

Operations Division
Operations Manager,
Completed Works

Ms. Denise Ford
Gulf South Research Corporation
8081 GSRI Avenue
Baton Rouge, Louisiana 70820

Dear Ms. Ford:

This is in response to your Solicitation of Views request dated February 11, 2009, and your Draft Environmental Assessment dated February 19, 2009, concerning the construction of the Fields 6th Avenue site at Lake Charles, Louisiana, in Calcasieu 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 (DA) 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.

This preliminary determination is advisory in nature. If an approved delineation is needed please furnish us with the detailed field data concerning vegetation, soils, and hydrology that we require for all jurisdictional decisions. The fact that a field wetland delineation/determination has not been completed does not alleviate your responsibility to obtain the proper DA permits prior to working in wetlands occurring on this property.

You and your client are advised that this approved 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) 862-2274, or by e-mail at 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. Ronnie Duke by telephone at (504) 862-2261 or by e-mail at Ronnie.W.Duke@usace.army.mil.

Future correspondence concerning this matter should reference our account number MVN-2009-00420-SY. This will allow us to more easily locate records of previous correspondence, and thus provide a quicker response.

Sincerely,


Karen L. Oberlies
Solicitation of Views Manager



MITCHELL J. LANDRIEU
LIEUTENANT GOVERNOR

State of Louisiana
OFFICE OF THE LIEUTENANT GOVERNOR
DEPARTMENT OF CULTURE, RECREATION & TOURISM
OFFICE OF CULTURAL DEVELOPMENT
DIVISION OF HISTORIC PRESERVATION

PAM BREAUX
SECRETARY
SCOTT HUTCHESON
ASSISTANT SECRETARY

March 2, 2009

Ms. Cynthia Teeter
Deputy Environmental Liaison Officer
FEMA-DR-1603-LA, FEMA-DR-1607-LA
U.S. Department of Homeland Security
Federal Emergency Management Agency
Louisiana Transitional Recovery Office
1250 Poydras Street, 14th Floor Environmental
New Orleans, LA 70113

RE: Section 106 Review Consultation, Hurricanes Katrina and Rita
Undertaking: Construction of Alternate Housing Pilot Program Housing,
Lake Charles Fields 6th Avenue Group Site, Calcasieu Parish, Louisiana
Determination: No Historic Properties Affected

Dear Ms. Teeter:

Thank you for your letter of February 19, 2009, concerning the above-referenced Undertaking. Your letter states that the buildings located within the view shed are not eligible for listing in the National Register of Historic Places. There was no determination of eligibility or photo documentation to evaluate any of the structures; therefore, we cannot comment on structures within the view shed of the project site. However, as there are no standing structures located within the APE, we concur with your assessment that the Undertaking will have no effect on historic properties.

If you have any questions, please contact Jason Emery at 504-762-2228 and Jason.emery@associates.dhs.gov or Valerie Gomez at (225) 342-0693 and vgomez@crt.state.la.us.

Sincerely,

Scott Hutcheson
State Historic Preservation Officer

SH:JE:VG:s

Denise Rousseau Ford

From: Diane Hewitt [Diane.Hewitt@LA.GOV]
Sent: Wednesday, March 04, 2009 1:07 PM
To: Denise Rousseau Ford
Subject: DEQ SOV: 90223/0400 Lake Charles Fields 6th Ave Site

March 4, 2009

Denise Rousseau Ford, Proj. Mgr.
Gulf South Research Corp.
3081 GSRI Ave.
Baton Rouge, LA 70820
dford@gsrcorp.com

RE:

90223/0400	Lake Charles Fields 6th Ave Site
	FEMA
	Calcasieu Parish

Dear Ms. Ford:

The Department of Environmental Quality, Office of Environmental Assessment and Office of Environmental Services received your request for comments on the above referenced project. Please take the appropriate steps to obtain and/or update all necessary approvals and environmental permits regarding this proposed project.

There were no objections based on the limited information submitted to us. However, the following comments have been included. Should you encounter a problem during the implementation of this project, please make the appropriate notification to this Department.

The Office of Environmental Services/Permits Division recommends that you investigate the following requirements that may influence your proposed project:

- If your project results in a discharge to waters of the state, submittal of a Louisiana Pollutant Discharge Elimination System (LPDES) application may be necessary.
- If the project results in a discharge of wastewater to an existing wastewater treatment system, that wastewater treatment system may need to modify their LPDES permit before accepting the additional wastewater.
- LDEQ has stormwater general permits for construction areas equal to or greater than one acre. It is recommended that you contact Melissa Conti at (225) 219-3078 to determine if your proposed improvements require one of these permits.
- All precautions should be observed to control nonpoint source pollution from construction activities.
- If any of the proposed work is located in wetlands or other areas subject to the jurisdiction of the U.S. Army Corps of Engineers, you should contact the Corps to inquire about the possible necessity for permits. If a Corps permit is required, part of the application process may involve a Water Quality Certification from LDEQ.
- All precautions should be observed to protect the groundwater of the region.
- Please be advised that water softeners generate waste waters that may require special limitations depending on local water quality considerations. Therefore if your water system improvements include water softeners, you are advised to contact DEQ, Water Permits to determine if special water quality based limitations will be necessary
- Any renovation or remodeling must comply with LAC 33:III.Chapter 28.Lead-Based Paint Activities, LAC 33:III.Chapter 27.Asbestos-Containing Materials in Schools and State Buildings (includes all training and accreditation) and LAC 33:III.5151.Emission Standard for Asbestos for any renovations or demolitions.

Currently, Calcasieu Parish is classified as an attainment parish with the National Ambient Air Quality Standards for all criteria air pollutants.

Please forward all future requests to Ms. Diane Hewitt, LDEQ/Performance Management/ P.O. Box 4301, Baton Rouge, LA 70821-4301 and we will expedite it as quickly as possible.

3/4/2009

If you have any questions, please contact me at (225)219-4079 or by email at diane.hewitt@la.gov. Permitting questions should be directed to the Office of Environmental Services at 225-219-3181.

Sincerely,

Diane Hewitt
LDEQ/Community and Industry Relations
Business and Community Outreach Division
Office of the Secretary
P.O. Box 4301 (602 N. 5th Street)
Baton Rouge, LA 70821-4301
Phone: 225-219-4079
Fx: 225-325-8208
Email: diane.hewitt@la.gov

APPENDIX C
Floodplain Eight Step Planning Process and Public Notification

**FEMA AHPP Lake Charles Fields 6th Avenue Group Housing Site
Eight-Step Planning Process for Floodplains and Wetlands**

<p>Step 1: Determine whether the Proposed Action is located in a wetland and/or the 100-year floodplain, or whether it has the potential to affect or be affected by a floodplain or wetland.</p>	<p>Project Analysis: According to the Flood Insurance Rate Map for the project site (Community Map Panel Number 2200400010E, effective July 07, 1997), the proposed AHPP group housing site is within the 100-year floodplain (Flood Zone AE).</p> <p>Based on a review of the National Wetlands Inventory (NWI) and a site visit, wetlands will not be impacted by the proposed AHPP housing project. The proposed site is in a developed urban setting which is not in area identified as a wetland.</p>
<p>Step 2: Notify public at earliest possible time of the intent to carry out an action in a floodplain or wetland, and involve the affected and interested public in the decision-making process.</p>	<p>Project Analysis: A public notice was issued by FEMA and the LRA notifying the public regarding the proposed action's floodplain impacts. In addition, FEMA and the LRA will notify the public of the availability of the draft Environmental Assessment (EA) which evaluates all natural resource impacts from the proposed project. The public notice will be provided in a newspaper of general circulation when the EA is made available for public review.</p>
<p>Step 3: Identify and evaluate practicable alternatives to locating the Proposed Action in a floodplain or wetland.</p>	<p>Project Analysis: The Applicant considered the following alternatives in selecting the proposed action:</p> <p><i>No Action Alternative:</i> Under the No Action Alternative, no AHPP housing would be provided for families displaced from their homes. Rental resources are very limited in the affected area, and people displaced by Hurricanes Katrina and Rita would remain in housing provided by family members or friends, in hotels, in temporary "dormitories" such as homeless shelters or churches, or in facilities damaged by the storm and determined structurally unsafe or unsanitary. Although no new construction would occur in the 100-year floodplain, permanent housing for Louisiana residents would remain inadequate.</p> <p><i>Proposed Action Alternative:</i> Under the Proposed Action Alternative, FEMA would purchase land and construct approximately 34 AHPP dwellings on an approximately 5.0-acre parcel of previously disturbed land located in</p>

<p>Step 3, continued</p>	<p>the eastern portion of Lake Charles, Louisiana. The cottages would be built on piers to bring them up to the required elevation, as necessary. Driveways would be constructed to facilitate access and parking for the AHPP cottages. The houses would tie into existing water and sewer infrastructure currently located near each lot site and utilities would then be installed to each individual cottage. The proposed site is wholly located in Zone AE within the 100-year floodplain.</p> <p><i>Build AHPP housing in other areas within Lake Charles (not included in EA because the sites had public opposition and/or funding issues):</i> The first site considered but dismissed was a 16-acre parcel of land owned by the City of Lake Charles and located in south Lake Charles, near the terminus of Clover Street and Sunset Drive. This site is in the 100-year floodplain in Zone A (no base flood elevation determined). The second site considered but dismissed was a 47-acre parcel of land located in south Lake Charles, east of 5th Avenue, approximately 0.5 mile north of East McNeese Street. Impacts to wetlands could occur, but were not fully evaluated.</p>
<p>Step 4: Identify the full range of potential direct or indirect impacts associated with the occupancy or modification of floodplains and wetlands, and the potential direct and indirect support of floodplain and wetland development that could result from the Proposed Action.</p>	<p>Project Analysis: Direct impacts to the floodplain include converting about 5 acres of 100-year floodplain to areas outside the floodplain. The loss of floodplain area in the vicinity of the project would generally be considered a considered a direct, permanent, however minimal adverse effect. The site was previously elevated by the subdivision developer to be approximately at or near the 13 foot Base Flood Elevation (BFE). Elevation of the proposed AHPP units to the BFE would be attained through the addition of fill material, the construction the AHPP units on piers, or through a combination of both. The proposed conversion of the project area to non-floodplain is not likely to result in an evident increase in flood velocities or elevations upstream or downstream.</p> <p>Although the project does not encourage additional development within the floodplain, the project will result in providing civic support to populations living in the floodplain which would be an indirect impact.</p>

<p>Step 4, continued</p>	<p>No direct or indirect impacts to wetlands are anticipated for the proposed project.</p>
<p>Step 5: Minimize the potential adverse impacts from work within floodplains and wetlands (identified under Step 4), restore and preserve the natural and beneficial values served by wetlands.</p>	<p>Project Analysis: To minimize impacts to the floodplain, the proposed AHPP cottages would be constructed on the proposed site which has already been filled and graded so that the AHPP group site development would be located outside the 100-year floodplain. The proposed AHPP units would be elevated above the BFE with a finished floor elevation at 13 feet above means sea level (amsl).</p>
<p>Step 6: Re-evaluate the Proposed Action to determine: 1) if it is still practicable in light of its exposure to flood hazards; 2) the extent to which it will aggravate the hazards to others; 3) its potential to disrupt floodplain and wetland values.</p>	<p>Project Analysis: The Proposed Action remains practicable as it increases permanent affordable housing in Louisiana, the minimal (if any) increase to flood elevations nearby, and abundant nearby floodplains retaining their natural values.</p>
<p>Step 7: If the agency decides to take an action in a floodplain or wetland, prepare and provide the public with a finding and explanation of any final decision that the floodplain or wetland is the only practicable alternative. The explanation should include any relevant factors considered in the decision-making process.</p>	<p>Project Analysis: Executive (EO) 11988 (Floodplain Management) requires Federal agencies to avoid direct or indirect support of development within the 100-year floodplain whenever there is a practicable alternative. FEMA applies the decision process described in 44 CFR Part 9, referred to as the Eight-Step Planning Process, to ensure that its actions are consistent with EO 11988.</p> <p>A public notice will be published informing the public of FEMA’s decision to proceed with the project. This notice will include rationale for floodplain impacts; a description of all significant facts considered in making the determination; a list of the alternatives considered; a statement indicating whether the action conforms to State and local floodplain protection standards; a statement indicating how the action affects the floodplain; and a statement of how mitigation will be achieved.</p>
<p>Step 8: Review the implementation and post-implementation phases of the Proposed Action to ensure that the requirements of the EOs are fully implemented. Oversight responsibility shall be integrated into existing processes.</p>	<p>Project Analysis: This step is integrated into the NEPA process and FEMA project management and oversight functions.</p>

FINAL PUBLIC NOTICE

FEMA-1603-DR-LA AND FEMA-1607-DR-LA

Proposed Federal Funding in the 100-year Floodplain

Public Notice is hereby given by the Federal Emergency Management Agency (FEMA) per 44 Code of Federal Regulations Part 9 (Floodplain Management and Protection of Wetlands), FEMA's implementing regulation for Executive Order 11988, Floodplain Management, of its intent to provide alternative pilot housing assistance under the Emergency Supplemental Appropriations Act for Defense, the Global War on Terror, and Hurricane Recovery of 2006, Pub. L. No. 109-234.

Recognizing the extensive and complex housing challenges facing victims and communities along the Gulf Coast region, as a result of the 2005 hurricane season, and acknowledging the limitations on Federal Emergency Management Agency's (FEMA) ordinary statutory authority to provide long-term and permanent housing solutions, the United States (U.S.) Congress appropriated funds to Department of Homeland Security (DHS) to support alternative housing pilot programs (Emergency Supplemental Appropriations Act, 2006, Public Law [P.L.] 109-234). The Alternative Housing Pilot Program (AHPP) represents a one-time exception to FEMA's existing authority under the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act). The Louisiana Recovery Authority (LRA), in conjunction with the State of Louisiana, has applied for FEMA funding under the AHPP to provide permanent housing solutions for eligible applicant families displaced by Hurricanes Katrina and Rita throughout the State of Louisiana, including within Calcasieu Parish.

After the Presidential disaster declarations FEMA-1603-DR-LA and FEMA-1607-DR-LA, FEMA published an initial floodplain notice providing information on the agency's disaster assistance actions in the 100-year floodplain (areas that have been determined to have a one percent probability of flooding in any given year).

This publication provides final notice for the construction of alternative pilot housing projects that would be located in the 100-year floodplain, at the proposed Fields 6th Avenue Group Housing Site, in Lake Charles, Calcasieu Parish, Louisiana. FEMA has determined that for the proposed action which consists of the acquisition of land and the installation of 34 cottage units, there are no practicable alternatives outside the floodplain because a large portion of the City of Lake Charles is within the floodplain. The LRA will ensure appropriate elevation of housing units through open works (columns, piers, piles, etc.) or fill. No additional fill would be needed for the proposed action due to the prior development of the subdivision in which fill was used to elevate the homesites to the base flood elevation. The applicant will ensure that construction meets the applicable State or local floodplain standards. Other mitigation measures may be incorporated on an action-by-action basis.

Maps of the area are available for public inspection upon request. Maps can also be accessed through the internet at <http://www.fema.gov/plan/ehp/noma/resources4.shtm#katrina> .

This constitutes final notice, and FEMA is accepting comments to its above determination. Written comments can be mailed to Environmental and Historic Preservation, 1250 Poydras Street, 14th Floor, New Orleans, LA 70114 or faxed to (504) 762-2527. The public comment period will be limited to the 15 days from February 20, 2009 to March 6, 2009.

APPENDIX D
Air Emission Calculations



CALCULATION SHEET-COMBUSTABLE EMISSIONS

Assumptions for Combustable Emissions					
Type of Construction Equipment	Num. of Units	HP Rated	Hrs/day	Days/yr	Total hp-hrs
Water Truck	1	300	8	240	576000
Diesel Road Compactors	1	100	8	90	72000
Diesel Dump Truck	2	300	8	90	432000
Diesel Excavator	1	300	8	90	216000
Diesel Hole Trenchers	0	175	8	90	0
Diesel Bore/Drill Rigs	0	300	8	90	0
Diesel Cement & Mortar Mixers	1	300	8	240	576000
Diesel Cranes	2	175	8	240	672000
Diesel Graders	1	300	8	90	216000
Diesel Tractors/Loaders/Backhoes	2	100	8	90	144000
Diesel Bull Dozers	0	300	8	90	0
Diesel Front End Loaders	1	300	8	90	216000
Diesel Fork Lifts	2	100	8	90	144000
Diesel Generator Set	6	40	8	90	172800

Emission Factors							
Type of Construction Equipment	VOC g/hp-hr	CO g/hp-hr	NOx g/hp-hr	PM-10 g/hp-hr	PM-2.5 g/hp-hr	SO2 g/hp-hr	CO2 g/hp-hr
Water Truck	0.440	2.070	5.490	0.410	0.400	0.740	536.000
Diesel Road Compactors	0.370	1.480	4.900	0.340	0.330	0.740	536.200
Diesel Dump Truck	0.440	2.070	5.490	0.410	0.400	0.740	536.000
Diesel Excavator	0.340	1.300	4.600	0.320	0.310	0.740	536.300
Diesel Trenchers	0.510	2.440	5.810	0.460	0.440	0.740	535.800
Diesel Bore/Drill Rigs	0.600	2.290	7.150	0.500	0.490	0.730	529.700
Diesel Cement & Mortar Mixers	0.610	2.320	7.280	0.480	0.470	0.730	529.700
Diesel Cranes	0.440	1.300	5.720	0.340	0.330	0.730	530.200
Diesel Graders	0.350	1.360	4.730	0.330	0.320	0.740	536.300
Diesel Tractors/Loaders/Backhoes	1.850	8.210	7.220	1.370	1.330	0.950	691.100
Diesel Bull Dozers	0.360	1.380	4.760	0.330	0.320	0.740	536.300
Diesel Front End Loaders	0.380	1.550	5.000	0.350	0.340	0.740	536.200
Diesel Fork Lifts	1.980	7.760	8.560	1.390	1.350	0.950	690.800
Diesel Generator Set	1.210	3.760	5.970	0.730	0.710	0.810	587.300

CALCULATION SHEET-COMBUSTABLE EMISSIONS

Emission factors (EF) were generated from the NONROAD2005 model for the 2006 calendar year. The VOC EFs includes exhaust and evaporative emissions. The VOC evaporative components included in the NONROAD2005 model are diurnal, hotsoak, running loss, tank permeation, hose permeation, displacement, and spillage. The construction equipment age distribution in the NONROAD2005 model is based on the population in U.S. for the 2006 calendar year.

Emission Calculations							
Type of Construction Equipment	VOC tons/yr	CO tons/yr	NOx tons/yr	PM-10 tons/yr	PM-2.5 tons/yr	SO2 tons/yr	CO2 tons/yr
Water Truck	0.279	1.314	3.485	0.260	0.254	0.470	340.227
Diesel Road Paver	0.029	0.117	0.389	0.027	0.026	0.059	42.544
Diesel Dump Truck	0.209	0.985	2.614	0.195	0.190	0.352	255.170
Diesel Excavator	0.081	0.309	1.095	0.076	0.074	0.176	127.657
Diesel Hole Cleaners\Trenchers	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Diesel Bore/Drill Rigs	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Diesel Cement & Mortar Mixers	0.387	1.473	4.621	0.305	0.298	0.463	336.228
Diesel Cranes	0.326	0.963	4.236	0.252	0.244	0.541	392.636
Diesel Graders	0.083	0.324	1.126	0.079	0.076	0.176	127.657
Diesel Tractors/Loaders/Backhoes	0.294	1.303	1.146	0.217	0.211	0.151	109.669
Diesel Bull Dozers	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Diesel Front End Loaders	0.090	0.369	1.190	0.083	0.081	0.176	127.633
Diesel Aerial Lifts	0.314	1.231	1.358	0.221	0.214	0.151	109.622
Diesel Generator Set	0.230	0.716	1.137	0.139	0.135	0.154	111.837
Total Emissions	2.324	9.105	22.396	1.854	1.805	2.869	2080.880

Conversion factors	
Grams to tons	1.102E-06

CALCULATION SHEET-TRANSPORTATION COMBUSTABLE EMISSIONS

Construction Worker Personal Vehicle Commuting to Construction Site-Passenger and Light Duty Trucks									
Pollutants	Emission Factors		Assumptions				Results by Pollutant		
	Passenger Cars g/mile	Pick-up Trucks, SUVs g/mile	Mile/day	Day/yr	Number of cars	Number of trucks	Total Emissions Cars tns/yr	Total Emissions Trucks tns/yr	Total tns/yr
VOCs	1.36	1.61	60	240	15	15	0.32	0.38	0.71
CO	12.4	15.7	60	240	15	15	2.95	3.74	6.69
NOx	0.95	1.22	60	240	15	15	0.23	0.29	0.52
PM-10	0.0052	0.0065	60	240	15	15	0.00	0.00	0.00
PM 2.5	0.0049	0.006	60	240	15	15	0.00	0.00	0.00

Heavy Duty Trucks Delivery Supply Trucks to Construction Site									
Pollutants	Emission Factors		Assumptions				Results by Pollutant		
	10,000-19,500 lb Delivery Truck	33,000-60,000 lb semi trailer rig	Mile/day	Day/yr	Number of trucks	Number of trucks	Total Emissions Cars tns/yr	Total Emissions Trucks tns/yr	Total tns/yr
VOCs	0.29	0.55	60	240	2	2	0.01	0.02	0.03
CO	1.32	3.21	60	240	2	2	0.04	0.10	0.14
NOx	4.97	12.6	60	240	2	2	0.16	0.40	0.56
PM-10	0.12	0.33	60	240	2	2	0.00	0.01	0.01
PM 2.5	0.13	0.36	60	240	2	2	0.00	0.01	0.02

Pollutants	Emission Factors		Assumptions				Results by Pollutant		
	Passenger Cars g/mile	Pick-up Trucks, SUVs g/mile	Mile/day	Day/yr	Number of Cars	Number of trucks	Total Emissions cars tns/yr	Total Emissions Trucks tns/yr	Total tns/yr
VOCs	1.36	1.61	30	240			-	0.00	-
CO	12.4	15.7	30	240			-	0.00	-
NOx	0.95	1.22	30	240			-	0.00	-
PM-10	0.0052	0.0065	30	240			-	0.00	-
PM 2.5	0.0049	0.006	30	240			-	0.00	-

Truck Emission Factor Source: USEPA 2005 Emission Facts: Average annual emissions and fuel consumption for gasoline-fueled passenger cars and light trucks. EPA 420-F-05-022 August 2005. Emission rates were generated using MOBILE.6 highway vehicle emission factor model.

CALCULATION SHEET-FUGITIVE DUST

Construction Fugitive Dust Emissions

Construction Fugitive Dust Emission Factors

	Emission Factor	Units	Source
General Construction Activities	0.19 ton PM10/acre-month		MRI 1996; EPA 2001; EPA 2006
New Road Construction	0.42 ton PM10/acre-month		MRI 1996; EPA 2001; EPA 2006

PM2.5 Emissions

PM2.5 Multiplier	0.10	(10% of PM10 emissions assumed to be PM2.5)	EPA 2001; EPA 2006
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Control Efficiency

0.50	(assume 50% control efficiency for PM10 and PM2.5 emissions)	EPA 2001; EPA 2006
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Project Assumptions

Construction Area (0.19 ton PM10/acre-month)

Duration of Construction Project	12	months
Length	0	miles
Length (converted)	0	feet
Width	0	feet
Area	5.00	acres

Conversion Factors

0.000022957	acres per feet
5280	feet per mile

Staging Areas

Duration of Construction Project		months
Length		miles
Length (converted)		feet
Width		feet
Area	0.00	acres

	Project Emissions (tons/year)			
	PM10 uncontrolled	PM10 controlled	PM2.5 uncontrolled	PM2.5 controlled
Costruction Area (0.19 ton PM10/acr	11.40	5.70	1.14	0.57
Staging Areas	0.00	0.00	0.00	0.00
Total	11.40	5.70	1.14	0.57

Construction Fugitive Dust Emission Factors

General Construction Activities Emission Factor

0.19 ton PM10/acre-month Source: MRI 1996; EPA 2001; EPA 2006

The area-based emission factor for construction activities is based on a study completed by the Midwest Research Institute (MRI) Improvement of Specific Emission Factors (BACM Project No. 1), March 29, 1996. The MRI study evaluated seven construction projects in Nevada and California (Las Vegas, Coachella Valley, South Coast Air Basin, and the San Joaquin Valley). The study determined an average emission factor of 0.11 ton PM10/acre-month for sites without large-scale cut/fill operations. A worst-case emission factor of 0.42 ton PM10/acre-month was calculated for sites with active large-scale earth moving operations. The monthly emission factors are based on 168 work-hours per month (MRI 1996). A subsequent MRI Report in 1999, Estimating Particulate Matter Emissions From Construction Operations, calculated the 0.19 ton PM10/acre-month emission factor by applying 25% of the large-scale earthmoving emission factor (0.42 ton PM10/acre-month) and 75% of the average emission factor (0.11 ton PM10/acre-month).

The 0.19 ton PM10/acre-month emission factor is referenced by the EPA for non-residential construction activities in recent procedures documents for the National Emission Inventory (EPA 2001; EPA 2006). The 0.19 ton PM10/acre-month emission factor represents a refinement of EPA's original AP-42 area-based total suspended particle (TSP) emission factor in Section 13.2.3 Heavy Construction Operations. In addition to the EPA, this methodology is also supported by the South Coast Air Quality Management District and the Western Regional Air Partnership (WRAP) which is funded by the EPA and is administered jointly by the Western Governor's Association and the National Tribal Environmental Council. The emission factor is assumed to encompass a variety of non-residential construction activities including building construction (commercial, industrial, institutional, governmental), public works, and travel on unpaved roads. The EPA National Emission Inventory documentation assumes that the emission factors are uncontrolled and recommends a control efficiency of 50% for PM10 and PM2.5 in PM nonattainment areas.

New Road Construction Emission Factor

0.42 ton PM10/acre-month Source: MRI 1996; EPA 2001; EPA 2006

The emission factor for new road construction is based on the worst-case conditions emission factor from the MRI 1996 study described above (0.42 tons PM10/acre-month). It is assumed that road construction involves extensive earthmoving and heavy construction vehicle travel resulting in emissions that are higher than other general construction projects. The 0.42 ton PM10/acre-month emission factor for road construction is referenced in recent procedures documents for the EPA National Emission Inventory (EPA 2001; EPA 2006).

PM2.5 Multiplier

0.10

PM2.5 emissions are estimated by applying a particle size multiplier of 0.10 to PM10 emissions. This methodology is consistent with the procedures documents for the National Emission Inventory (EPA 2006).

Control Efficiency for PM10 and PM2.5

0.50

The EPA National Emission Inventory documentation recommends a control efficiency of 50% for PM10 and PM2.5 in PM nonattainment areas. Wetting controls will be applied during project construction (EPA 2006).

References:

EPA 2001. *Procedures Document for National Emissions Inventory, Criteria Air Pollutants, 1985-1999*. EPA-454/R-01-006. Office of Air Quality Planning and Standards, United States Environmental Protection Agency. March 2001.

EPA 2006. *Documentation for the Final 2002 Nonpoint Sector (Feb 06 version) National Emission Inventory for Criteria and Hazardous Air Pollutants*. Prepared for: Emissions Inventory and Analysis Group (C339-02) Air Quality Assessment Division Office of Air Quality Planning and Standards, United States Environmental Protection Agency. July 2006.

MRI 1996. *Improvement of Specific Emission Factors (BACM Project No. 1)*. Midwest Research Institute (MRI). Prepared for the California South Coast Air Quality Management District, March 29, 1996.

CALCULATION SHEET-SUMMARY OF EMISSIONS

Proposed Action Construction Emissions for Criteria Pollutants (tons per year)						
Emission source	VOC	CO	NOx	PM-10	PM-2.5	SO2
Combustable Emissions	2.32	9.10	22.40	1.85	1.80	2.87
Construction Site-fugitive PM-10	NA	NA	NA	5.70	0.57	NA
Construction Workers Commuter & Trucking	0.73	6.83	1.07	0.02	0.02	NA
Total emissions	3.06	15.94	23.47	7.57	2.39	2.87
De minimis threshold	NA	NA	NA	NA	NA	NA