

18-hole professional public golf course comprises the largest part of the District and is adjacent to the project area. It is located in the approximate center of the park, with recreational and community facilities around its perimeter. The Joseph Bartholomew Maintenance Building was constructed in 1985, which is outside of the District's POS. FEMA determined that the maintenance building was a non-contributing element of the District. SHPO concurrence with this determination was reviewed dated December 4, 2009. Other non-contributing elements of the District within the project area include the Joseph Bartholomew Golf Course Club House and Picnic Shelter as well as the Pontchartrain Park Community Center.

Archaeological Properties

The archaeological potential for Pontchartrain Park, which includes the project area, was previously assessed in October 2009 during the NHPA Section 106 review for restoration of the Joseph Bartholomew Golf Course. The following identification and evaluation is based on the assessment carried out in 2009. In March 2011, FEMA archaeologists reviewed the documentation produced in 2009 and determined that it was sufficient to conduct a review under Section 106. Following is a summary.

Data from SHPO indicates there is one recorded archaeological site within 0.25 miles of the project area. Site 16OR219, Camp Leroy Johnson U.S. Army Air Base, is located north of the APE. This military base was constructed on lake bottom land, reclaimed by construction of levees in 1927, and functioned from 1941-1964. This archaeological site was evaluated in 2006 as ineligible for listing on the NRHP. According to the site form, the boundaries of 16OR219 do not extend south of the railroad or Leon C. Simon Drive and thus, it would not be affected by the proposed undertaking. Archaeological site 16OR324, located approximately 0.47 miles from the project area at 2659 New York Street, is a circa 1950 bunker whose NRHP eligibility is undetermined. Given its distance from the proposed action, this site will not be affected by any of the proposed alternatives.

The project area falls within the Orleans Parish High Probability Zone because of its location near the old lakeshore. The soils consist of drained Allemands muck formed in river backswamps. This area is comprised of reclaimed land from the Lake Pontchartrain lake bottom or backswamp. The Hardee's 1878 map entitled *New Orleans* shows much of this general area as undeveloped swamp. By 1884 this area was slated for potential development with a grid of streets, although no evidence was located to demonstrate that residential development took place in this vicinity during this time. No improvements are shown in the project area on the 1937-1951 Sanborn Fire Insurance Map. The 1953 U.S.G.S. Spanish Fort quadrangle depicts no improvements in the project area. Between 1955 and 1957 aerial photographs show the Barrow Stadium baseball field being constructed, with the remainder of the project area surrounded by undeveloped land or recently leveled or graded land. In summary, the site appears to be extensively disturbed by previous construction and extensively filled. A site visit was conducted by FEMA Archaeologist Dale Wolke in October 2009, as part of an examination of evaluation of the Joseph Bartholomew Golf Course and Pontchartrain Park. No prehistoric artifacts or features were encountered during the pedestrian survey. A small cluster of brick fragments and whiteware ceramics were noted in fill material. In the resulting consultation for the elevation of depressed fairways, replacement of subsurface drainage, modifications to the golf course grounds, and in-

kind repairs to the structures, FEMA HP determined that no archaeological resources would be impacted by the undertaking and submitted a finding of No Adverse Effect to Historic Properties to SHPO and Tribes (Project Worksheet 1603-18043-2). SHPO concurrence with this determination was received dated December 4, 2009. The Alabama-Coushatta Tribe of Texas concurred with FEMA's determination on December 17, 2009.

The prehistoric and historic archaeological potential of the project area appears very low given the recent nature of the historic development in this area, the amount of previous ground disturbance, and that significant historic deposits associated with the early years of the District (circa 1957-1961) are unlikely given that city water and sewer were available at this time.

Alternative 1 - No Action: This alternative does not include any FEMA undertaking; therefore FEMA has no further responsibilities under Section 106 of the National Historic Preservation Act.

Alternative 2 – Reconstruction in the Same Footprint: This alternative involves the demolition and reconstruction of the facility within the same footprint. As the building is a non-contributing element of the District, the demolition of the Joseph Bartholomew Maintenance Building would have no adverse effect to historic properties. In-kind reconstruction in the existing location would not impact any above ground resources, provided that replacement facility had the same massing, height, scale, and materials as the original building. In addition, no archaeological resources would be affected by the undertaking.

Alternative 3 - Reconstruction at an Alternate Location - Proposed Action: FEMA defined the Area of Potential Effects (APE) for both Standing Structures and Archaeology. The Standing Structures APE comprises the project site, as well as a portion of the golf course and park areas of Pontchartrain Park. The APE for Archaeology is the one acre project site for construction of a new facility 160 feet south of the original building.

Based on archaeological investigations from 2009 and 2011, FEMA has determined that proposed action will not affect below ground resources. Although the proposed action will introduce a new visual element into the District, the new building will be of a similar size, massing, and design of the existing maintenance building. Therefore, the new construction will not adversely affect the District. FEMA HP applied the Criteria of Adverse Effect at 36 CFR 800.5(a)(1) and has determined a finding of **No Adverse Effect to Historic Properties** for the proposed action. FEMA will present this finding in a letter that will be submitted to SHPO and Tribes in late November 2011. FEMA anticipates receiving concurrence of this determination from SHPO and Tribes by late December 2011.

4.6 Hazardous Materials

The management of hazardous materials is regulated under various federal and state environmental and transportation laws and regulations, including the Resource Conservation and Recovery Act (RCRA) the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Emergency Planning and Community Right-to-Know Act, the

Hazardous Materials Transportation Act, and the Louisiana Voluntary Investigation and Remedial Action statute. The purpose of the regulatory requirements set forth under these laws is to ensure the protection of human health and the environment through proper management (identification, use, storage, treatment, transport, and disposal) of these materials. Some of these laws provide for the investigation and cleanup of sites already contaminated by releases of hazardous materials, wastes, or substances.

A database search prepared for the proposed project site revealed that there are no Louisiana Volunteer Remedial Program (VRP)/Brownfield sites located on the proposed site. No sites of concern were found during a review of the Electronic Document Management System (EDMS) database for other hazardous waste management and disposal, solid waste disposal, storage tank, enforcement, and other databases on the proposed site. There are no recorded oil and gas wells on or near the proposed property.

A search of the Louisiana Department of Environmental Quality (LDEQ) Leaking Underground Storage Tank (LUST) database revealed no recorded LUST sites within 0.25 miles of the site. A database search prepared for the proposed project site revealed that there are no Louisiana Volunteer Remedial Program (VRP)/Brownfield sites located within 0.5 miles of the site.

Alternative 1 – No Action: The No Action alternative would not disturb any hazardous materials or create any potential hazard to human health.

Alternative 2 – Reconstruction in the Same Footprint: No hazardous materials, wastes, or substances (including contaminated soil or groundwater) have been identified at the site. Reconstruction of the Joseph Bartholomew Maintenance Building in substantially its same footprint would not disturb any hazardous materials or create any potential hazard to human health.

Alternative 3 – Reconstruction at an Alternate Location - Proposed Action: Findings indicate that no hazardous materials, wastes, or substances (including contaminated soil or groundwater) have been identified at the proposed site. If hazardous constituents are unexpectedly encountered in the project area during the proposed construction operations, appropriate measures for the proper assessment, remediation and management of the contamination shall be initiated in accordance with applicable Federal, state, and local rules and regulations.

Project construction may involve the use of hazardous materials (*e.g.*, petroleum products, cement, caustics, acids, solvents, paints, electronic components, pesticides/herbicides and fertilizers, treated timber) and may result in the generation of small volumes of hazardous wastes. Best management practices and appropriate measures to prevent, minimize, and control spills of hazardous materials shall be taken, and any hazardous and non-hazardous wastes generated shall be disposed of in accordance with applicable federal, state, and local requirements.

4.7 Environmental Justice

Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, was signed on February 11, 1994. The EO directs federal agencies to make achieving environmental justice part of their missions by identifying and addressing, as appropriate, disproportionately high adverse human health, environmental, economic, and social effects of its programs, policies and activities on minority or low-income populations.

According to the most readily available (2000) U.S. Bureau of the Census Demographic Profile Highlights for New Orleans zip code 70126, 10.3 percent of the population is white, 87.1 percent is black, 1.6 percent is Hispanic, 0.7 percent is Asian, 0.2 percent is Native American, and 0.0 percent is Native Hawaiian. The median household income was \$30,627.

Alternative 1 – No Action: The No Action Alternative would not involve the implementation of a federal program, policy or activity. Therefore, there will be no disproportionate adverse impacts to low-income or minority populations.

Alternative 2 – Reconstruction in the Same Footprint: Reconstruction of the Joseph Bartholomew Maintenance Building in substantially its same footprint would have no disproportionate adverse impacts to low-income or minority populations.

Alternative 3 – Reconstruction at an Alternate Location - Proposed Action: The proposed action will not impose disproportionate adverse human health, economic, or social effects on minority or low-income populations. The activity would replace previous existing function to a currently developed parcel of previously-disturbed urban land, and much of the surrounding land near the proposed site is currently developed. Residential neighborhoods begin within 0.5 mile east and south of the proposed project site. The proposed recreational facility would serve residents living throughout Orleans Parish.

5.0 CUMULATIVE IMPACTS

According to the Council on Environmental Quality (CEQ) regulations, cumulative impacts represent the “impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions, regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative effects can result from individually minor but collectively significant actions taking place over a period of time (40 CFR 1508.7).

The entire Louisiana Gulf Coast is undergoing recovery efforts after the 2005 hurricane season which includes demolition, reconstruction, and new construction, within private sector as well as Federal and state government. The USACE is undergoing one of the largest projects in their history, rebuilding the Greater New Orleans Hurricane and Storm Damage Risk Reduction System, which will improve approximately 350 miles of levees, concrete floodwalls, and other structures to meet 100-year level of risk reduction. The Louisiana Department of Transportation and Development (LADOTD) has a large number of infrastructure improvements ongoing in and around Orleans Parish such as the Huey P. Long Bridge widening, the I-10 Twin Span Bridge

replacement, and the I-10 and Causeway interchange improvements. The combination of all recovery development projects, including those mentioned above would have cumulative effects to Orleans Parish. However, it is anticipated that the Proposed Action would not have cumulative impacts on resources addressed in this EA.

6.0 CONDITIONS AND MITIGATION MEASURES

Based upon the studies and consultations undertaken in this EA, several conditions must be met and mitigation measures must be taken by City of New Orleans (Applicant) prior to and during project implementation.

- In accordance with applicable local, state, and federal regulations, the applicant is responsible for acquiring any necessary permits and/or clearances prior to the commencement of any construction related activities.
- The project is currently under evaluation by FEMA to determine the minimum BFE this facility must be protected against. The City of New Orleans is also required to coordinate 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 the State and FEMA as part of the permanent project files. Per 44 CFR 9.11(d)(9), mitigation or minimization standards must be applied, where possible. The replacement of building contents, materials, and equipment should be, where possible, wet or dry-proofed, elevated, or relocated to or above the BFE.
- Fill or borrow material used must be sourced from sites that do not contain any buried cultural materials (*i.e.*, wells, cisterns, foundations, basements, prehistoric Indian artifacts, human burials, and the like). If during the course of work, archaeological artifacts (prehistoric or historic) or human remains are discovered, City of New Orleans and/or its contractors must immediately stop work in the vicinity of the discovery and take all reasonable measures to avoid or minimize harm to the finds. The Applicant and GOHSEP must inform the FEMA Public Assistance program, who would in turn contact the FEMA Historic Preservation staff. The Applicant must not proceed with work until FEMA completes the necessary reviews required by Section 106 of NHPA. In addition, if unmarked graves are present, compliance with the Louisiana Unmarked Human Burial Sites Preservation Act is required. In that situation, the Applicant must notify the local law enforcement agency within 24 hours of the discovery, and notify FEMA and the Louisiana Division of Archaeology at (225) 342-8170 within 72 hours of the discovery. Failure to comply with these stipulations may jeopardize FEMA funding of the project.
- Project construction would involve the use of potentially hazardous materials (*e.g.*, petroleum products, cement, caustics, acids, solvents, paint, electronic components, pesticides, herbicides, fertilizers, treated timber) and may result in the generation of small volumes of hazardous wastes. Appropriate measures to prevent, minimize, and control spills of hazardous materials must be taken and generated hazardous and non-hazardous wastes are required to be disposed in accordance with applicable Federal, state and local regulations.

- The project has been found by the LDNR to be inside the Louisiana Coastal Zone; therefore, they require that a complete Coastal Use Permit Application package (Joint Application Form, locality maps, project illustration plats with plan and cross section views, etc.) along with the appropriate application fee be submitted to their office prior to construction.

7.0 PUBLIC INVOLVEMENT AND AGENCY CONSULTATION

FEMA is the lead federal agency for conducting the NEPA compliance process for this Public Assistance project. It is the responsibility of the lead agency to conduct the preparation and review of NEPA documents in a way that is responsive to the needs of the Parish communities while meeting the spirit and intent of NEPA and complying with all NEPA provisions. As part of the development of early interagency coordination related to the proposed action, state and Federal resource protection agencies were contacted and FEMA distributed an informal scoping notification through a Solicitation of Views.

These agencies include the State Historical Preservation Officer, U. S. Fish and Wildlife Service, the U.S. Department of Agriculture Natural Resources Conservation Service, the Governor's Office of Homeland Security and Emergency Preparedness, Louisiana Department of Environmental Quality, U. S. Environmental Protection Agency, Louisiana Department of Natural Resources, and the U. S. Army Corps of Engineers. FEMA has received no objections to the project as proposed subsequent to these notifications and comments and conditions received have been incorporated into this NEPA document.

FEMA is inviting the public to comment on the proposed action during a fifteen (15) day comment period. A public notice will be published for 5 days in the local newspaper, *The Times-Picayune*, announcing the availability of this EA for review at the Orleans Parish Main Library at 219 Loyola Avenue, New Orleans, LA. A copy of the Public Notice is attached in Appendix C.

8.0 LIST OF PREPARERS

Holly Mittel – Environmental Specialist
June Griffin – Floodplain Specialist
Adam Borden – Lead Environmental Specialist
Alice-Anne Krishnan – Historic Preservation Specialist
Daphne Owens – Archaeologist / Historic Preservation Specialist
Tiffany Spann-Winfield – Deputy Environmental Liaison Officer

9.0 REFERENCES

Endangered Species Act of 1973

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Appendix A

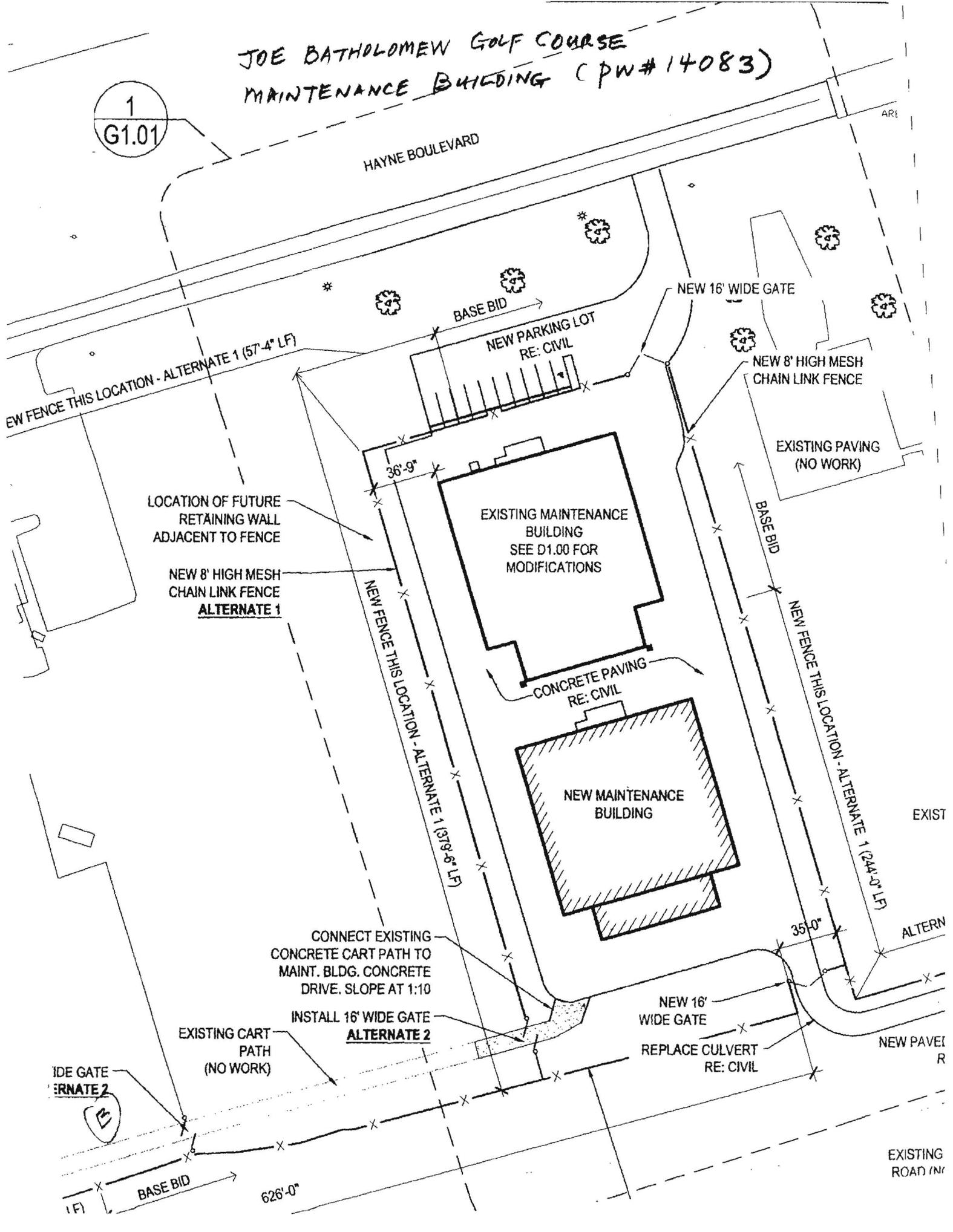
Site Plan

Note: The site plan is included in the PDF version of this document

JOE BATHOLOMEW GOLF COURSE MAINTENANCE BUILDING (PW# 14083)

1
G1.01

HAYNE BOULEVARD



NEW FENCE THIS LOCATION - ALTERNATE 1 (57'-4" LF)

LOCATION OF FUTURE
RETAINING WALL
ADJACENT TO FENCE

NEW 8' HIGH MESH
CHAIN LINK FENCE
ALTERNATE 1

NEW FENCE THIS LOCATION - ALTERNATE 1 (378'-6" LF)

NEW PARKING LOT
RE: CIVIL

EXISTING MAINTENANCE
BUILDING
SEE D1.00 FOR
MODIFICATIONS

CONCRETE PAVING
RE: CIVIL

NEW MAINTENANCE
BUILDING

NEW 16' WIDE GATE

NEW 8' HIGH MESH
CHAIN LINK FENCE

EXISTING PAVING
(NO WORK)

BASE BID

NEW FENCE THIS LOCATION - ALTERNATE 1 (244'-0" LF)

EXIST

CONNECT EXISTING
CONCRETE CART PATH TO
MAINT. BLDG. CONCRETE
DRIVE. SLOPE AT 1:10

INSTALL 16' WIDE GATE
ALTERNATE 2

EXISTING CART
PATH
(NO WORK)

NEW 16'
WIDE GATE

REPLACE CULVERT
RE: CIVIL

NEW PAVI
R

IDE GATE
ERNATE 2

BASE BID

626'-0"

EXISTING
ROAD (N)

Appendix B
Agency Correspondence

Note: State and Federal Agency correspondence is included in the PDF version of this document



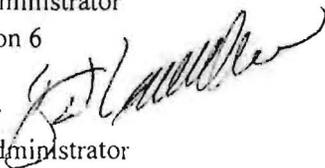
FEMA

October 13, 2011

MEMORANDUM FOR:

Tony Russell
Regional Administrator
FEMA Region 6

FROM:

David Miller 
Associate Administrator
Federal Insurance and Mitigation Administration

SUBJECT:

Guidance for use of Best Available Data in Complying with
44 CFR 9 and EO 11988 for Certain Areas of Greater New
Orleans

This memorandum provides guidance on the requirement in 44 CFR 9.7(c) and Executive Order 11988 Sec. 2(a)(1) for the use of best available flood hazard information in areas of Louisiana located within the recently constructed Hurricane and Storm Damage Risk Reduction System (HSDRRS).

On February 6, 2006, and June 5, 2007, FEMA issued guidance clarifying the sources of best available flood risk data for compliance with 44 CFR Part 9 and EO 11988. The best available flood risk data drives elevation and reconstruction requirements and impacts eligibility for FEMA grants. These sources were identified initially as Advisory Base Flood Elevations (ABFEs). In the Fall of 2008, the ABFEs for the five Greater New Orleans (GNO) area parishes of St. Bernard, St. Charles, Jefferson, Orleans, and Plaquemines, were replaced by the Preliminary Digital Flood Insurance Rate Maps (DFIRMs) as the source of best available flood risk data.

In September 2011, the US Army Corps of Engineers (USACE) provided FEMA with assurances that the Hurricane and Storm Damage Risk Reduction System (HSDRRS) is capable of defending against a storm surge with a 1% annual-chance event of occurring in any given year. The areas protected by this include portions of St. Bernard, St. Charles, Jefferson, Orleans, and Plaquemines. FEMA has now begun revising the preliminary DFIRMs within the HSDRRS to incorporate the reduced flood risk associated with the system improvements. In the Spring of 2012, FEMA should be prepared to release revised preliminary DFIRMs.

The 2008 Preliminary DFIRMs – currently viewed as the best available flood risk data for the five GNO parishes – do not consider the completion of the HSDRRS. In many areas, the flood risk has been significantly reduced due to heightened protection. However, until the new flood maps are issued,

reconstruction requirements associated with FEMA grant programs may require projects to exceed a reasonable level of protection. This may impact the pace and cost of the recovery effort.

To afford appropriate flexibility and ensure that the most current best available data informs decision making when reviewing and approving grant applications for projects that have not been started and may be protected by the HSDRRS, you are authorized to re-examine individual FEMA grant reconstruction projects. You must use sound engineering data and judgment to determine on a case-by-case or geographic basis if the 2008 Preliminary DFIRM is the appropriate best available flood risk data or if there is better data that more closely matches current flood risk levels. The case-by-case review may indicate that the source of best available flood risk data for a reconstruction project is preliminary DFIRMs, ABFEs, or other relevant sound engineering data. You must ensure that the technical information that serves as the basis of this engineering determination is documented in the project file as part of the 8-step decision making process required by EO 11988. Further, consistent with 44 C.F.R. 9.11(d)(6), no project should be built to a floodplain management standard that is less protective than what the community has adopted in local ordinances through their participation in the National Flood Insurance Program.

If you have any questions or need additional information regarding this guidance, please contact Roy Wright, Deputy Director, Risk Analysis Division, by telephone at (202) 646-3461.

CC: Deborah Ingram, Assistant Administrator for Recovery

Sandra Knight, Deputy Associate Administrator for Mitigation (FIMA)

Mittel, Holly (CTR)

From: Beth Altazan-Dixon [Beth.Dixon@LA.GOV]
Sent: Friday, September 23, 2011 11:12
To: Holly.mittel@associates.dhs.gov
Subject: DEQ SOV 110914/2710 Joe Bartholomew Golf Course Maintenance Building Reconstruction

September 23, 2011

Tiffany Spann-Winfield, Deputy Environmental Liaison Officer
FEMA-Environmental Section, 4th Floor
1 Seine Court
New Orleans, LA 70114
Holly.mittel@associates.dhs.gov

RE: 110914/2710 Joe Bartholomew Golf Course Maintenance Building Reconstruction
FEMA Funding
Orleans Parish

Dear Ms. Spann-Winfield:

The Department of Environmental Quality (LDEQ), Business and Community Outreach Division has received your request for comments on the above referenced project.

After reviewing your request, the Department has no objections based on the information provided in your submittal. However, for your information, the following general comments have been included. Please be advised that if you should encounter a problem during the implementation of this project, you should immediately notify LDEQ's Single-Point-of-contact (SPOC) at (225) 219-3640.

- Please take any necessary steps to obtain and/or update all necessary approvals and environmental permits regarding this 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 its LPDES permit before accepting the additional wastewater.
- All precautions should be observed to control nonpoint source pollution from construction activities. LDEQ has stormwater general permits for construction areas equal to or greater than one acre. It is recommended that you contact the LDEQ Water Permits Division at (225) 219-3181 to determine if your proposed project requires a permit.
- If your project will include a sanitary wastewater treatment facility, a Sewage Sludge and Biosolids Use or Disposal Permit application or Notice of Intent must be submitted no later than June 1, 2011. Additional information may be obtained on the LDEQ website at <http://www.deq.louisiana.gov/portal/tabid/2296/Default.aspx> or by contacting the LDEQ Water Permits Division at (225) 219- 3181.
- 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 directly regarding permitting issues. 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 wastewaters 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 the LDEQ 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.
- If any solid or hazardous wastes, or soils and/or groundwater contaminated with hazardous constituents are encountered during the project, notification to LDEQ's Single-Point-of-Contact (SPOC) at (225) 219-3640 is required. Additionally, precautions should be taken to protect workers from these hazardous constituents.

Currently, Orleans Parish is classified as attainment with the National Ambient Air Quality Standards and has no general conformity determination obligations.

Please send all future requests to my attention. If you have any questions, please feel free to contact me at (225) 219-3958 or by email at beth.dixon@la.gov.

Sincerely,



Beth Altazan-Dixon
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LDEQ/Business and Community Outreach Division
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