

DRAFT Environmental Assessment

Emergency Maintenance Division
Central Maintenance and Fuel Facility
City of New Orleans
FEMA-1603-DR-LA

New Orleans, Orleans Parish, Louisiana
May 2013

U.S. Department of Homeland Security
Federal Emergency Management Agency, Region VI
Louisiana Recovery Office
New Orleans, Louisiana 70114



FEMA

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LIST OF ACRONYMS

ABFE	Advisory Base Flood Elevation
ACC	Annual Contributions Contract
ACHP	Advisory Council of Historical Preservation
ACM	Asbestos-Containing Materials
APE	Area of Potential Effects
BFE	Base Flood Elevation
bgs	Below Ground Surface
BMP	Best Management Practices
BTEX	Benzene, Ethyl Benzene, Toluene, Xylene
CAP	Corrective Action Plan
CBRA	Coastal Barrier Resources Act
CBRS	Coastal Barrier Resources System
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CNO	City of New Orleans
COC	Constituents of Concerns
CWA	Clean Water Act
CZMA	Coastal Zone Management Act
DFIRM	Digital Flood Insurance Rate Map
EA	Environmental Assessment
EIS	Environmental Impact Statement
EMD	Equipment Maintenance Department
EO	Executive Order
ESA	Endangered Species Act
EDMS	Electronic Document Management System
EPH	Extractable Petroleum Hydrocarbons
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FONSI	Finding of No Significant Impact
GNO	Greater New Orleans
GW _{SS}	Ground Water Screening Standard
HANO	Housing Authority of New Orleans
HEAG	Highest Existing Adjacent Grade
HCVP	Housing Choice Voucher Program
HP	Historical Preservation
HSDRRS	Hurricane Storm Damage Risk Reduction System
HUD	Housing and Urban Development
LAC	Louisiana Administrative Code
LADOTD	Louisiana Department of Transportation and Development
LA GOHSEP	Louisiana Governor's Office of Homeland Security and Emergency Preparedness
LCRP	Louisiana Coastal Resources Plan
LBP	Lead-Based Paint
LDEQ	Louisiana Department of Environmental Quality
LDNR	Louisiana Department of Natural Resources

LDWF	Louisiana Department of Wildlife and Fisheries
LPDES	Louisiana Pollutant Discharge Elimination System
LESHAP	Louisiana Emission Standards for Hazardous Air Pollutants
LSS	Limiting Screening Standard
MMG	Materials Management Group
MO1	Management Option 1
MTBE	Methyl Tertiary Butyl Ether
NEPA	National Environmental Policy Act
NESHAP	National Emission Standards for Hazardous Air Pollutants
NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service
NOAA	National Oceanic and Atmospheric Administration
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NWI	National Wetlands Inventory
PA	Public Assistance
PACM	Presumed Asbestos Containing Material
PAH	Polycyclic Aromatic Hydrocarbons
PII ESA	Phase II Environmental Site Assessment
REC	Recognized Environmental Conditions
RECAP	Risk Evaluation/Corrective Action Program
RCRA	Resource Conservation and Recovery Act
RHA	Rivers and Harbors Act
SHPO	State Historic Preservation Office/Officer
Soil _{SSGW}	Soil Protective of Groundwater
Soil _{SSni}	Soil Non-Industrial Site
SVOC	Semi Volatile Organic Compound
SWPPP	Storm Water Pollution Prevention Plan
TPH-D	Total Petroleum Hydrocarbon as Diesel
USACE	United States Army Corps of Engineers
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
VOC	Volatile Organic Compounds

1.0 INTRODUCTION

1.1 Project Authority

Hurricane Katrina made landfall on August 29, 2005 near the town of Buras, Louisiana with sustained winds of more than 125 miles per hour. President George W. Bush declared a major disaster for the State of Louisiana (FEMA-1603-DR-LA) on August 29, 2005, authorizing the Department of Homeland Security's Federal Emergency Management Agency (FEMA) to provide federal assistance in designated areas of Louisiana. This is pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), Public Law 93-288, as amended. Section 406 of the Stafford Act authorizes FEMA's Public Assistance Program (PA) to assist in funding the repair, restoration, reconstruction or replacement of public facilities damaged as a result of the declared disaster.

This Environmental Assessment (EA) has been prepared in compliance with the National Environmental Policy Act of 1969 (NEPA), the President's Council on Environmental Quality (CEQ) regulations implementing NEPA (Title 40 of the Code of Federal Regulations [CFR] Parts 1500 to 1508), and FEMA's regulations implementing NEPA (44 CFR Parts 9 and 10).

The purpose of this EA is to analyze potential environmental impacts of the proposed project. FEMA will use the findings in this EA to determine whether to prepare an Environmental Impact Statement (EIS) or a Finding of No Significant Impact (FONSI).

1.2 Background

The storm surge from Hurricane Katrina damaged levees and entered the City of New Orleans (CNO) from various coastal waterways, resulting in flooding throughout much of the area. Subsequently, the winds and floodwaters caused substantial damage to the Emergency Maintenance Division (EMD) Central Maintenance and Fuel Facility which is operated CNO. The facility sustained major damage as a result of Hurricane Katrina and it was deemed eligible by FEMA for federal disaster public assistance.

EMD Central Maintenance and Fuel Facility is situated in the Desire area of eastern New Orleans. The pre-existing facility is located at 3800 Alvar Street. The proposed location for expansion of the facility is 3900 Alvar Street. The pre-existing building is bordered by Alvar Street to the east, Chickasaw Street to the North, a warehouse to the west, and an undeveloped area to the south. The proposed location is bordered by Alvar Street to the East, a warehouse to the north, a parking lot to the west, and Chickasaw Street to the South.

The pre-existing facility consists of a 61,000 square foot (sq) structure that functioned as a repair shop, fueling station, and storage area for ambulances, police vehicles, fire trucks, and maintenance vehicles. The facility housed hydraulic lift bays, below-grade vehicle access pits, a machine shop, and administrative offices.

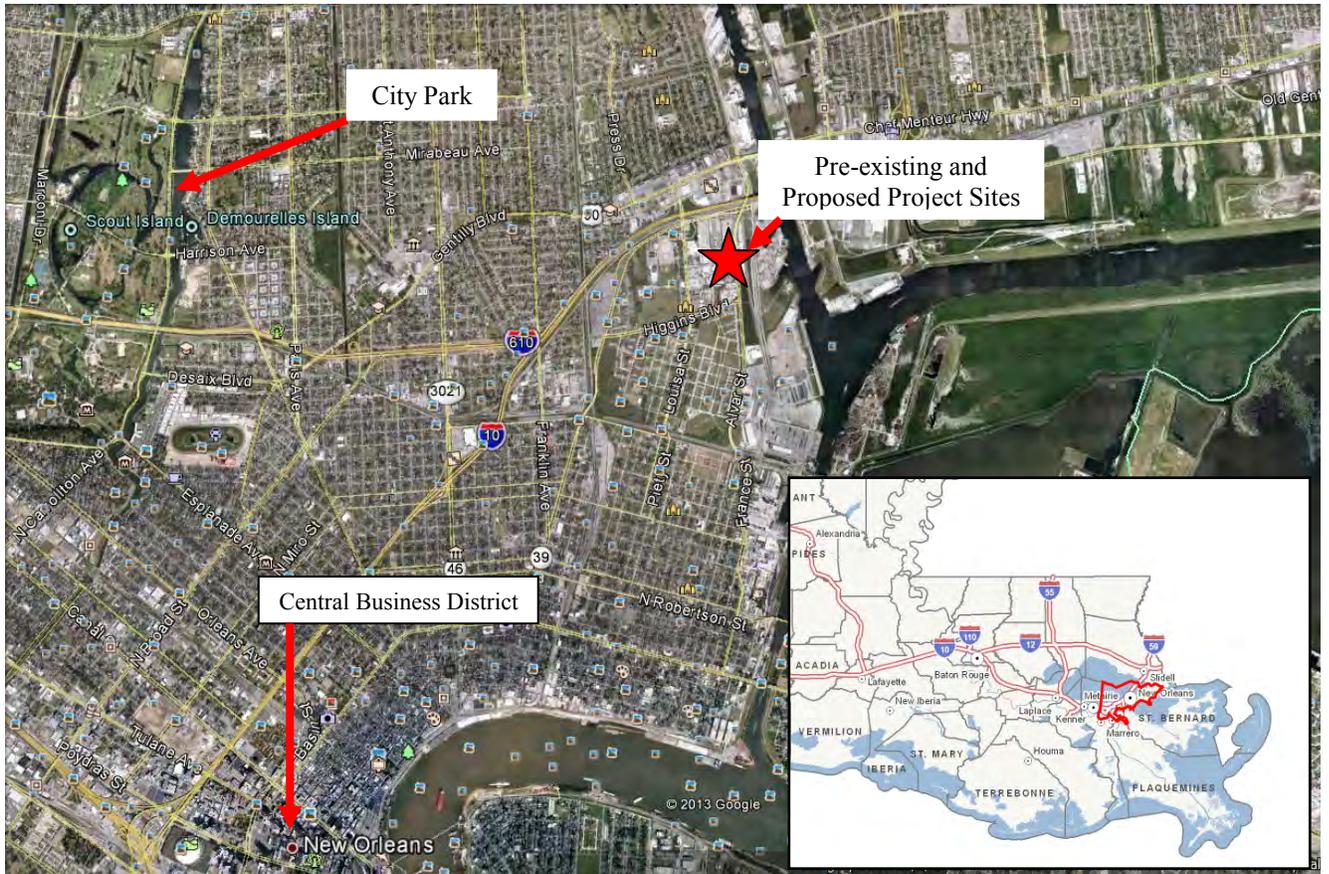


Figure 1 – EMD Central Maintenance and Fuel Facility project vicinity (Google Earth, 2012)



Figure 2 – Pre-existing and proposed project sites (Google Earth, 2012)

2.0 PURPOSE AND NEED

The objective of FEMA’s Public Assistance (PA) Grant Program is to provide assistance to State, Tribal and local governments, and certain types of Private Nonprofit organizations so that communities can quickly respond to and recover from major disasters or emergencies declared by the President. Under certain criteria, applicants may apply for FEMA PA grants to complete improved projects. Improved projects give applicants the opportunity to make additional improvements while restoring a facility to its pre-disaster function. The Applicant, through the Louisiana Governor’s Office of Homeland Security and Emergency Preparedness (LA GOHSEP), has requested federal funds to complete an improved project to restore facilities and services lost at EMD Central Maintenance and Fuel Facility as a result of Hurricane Katrina.

Prior to Hurricane Katrina, EMD Central Maintenance and Fuel Facility served as a maintenance, fuel, and storage facility for the New Orleans Police and Fire Departments. The purpose of this project is to restore the services, facilities, and resources that were lost as a result

of Hurricane Katrina. The need is defined by the lack of current resources for storage and upkeep of city vehicles. CNO seeks federal grant funds to move the maintenance function to the proposed site. This expansion would serve as a repair and storage facility for equipment and vehicles, expanding the EMD's current maintenance and warehousing capabilities.

3.0 ALTERNATIVES

The NEPA process consists of an evaluation of the environmental effects of a federal undertaking including its alternatives. Three alternatives have been proposed and reviewed including, 1) the No Action Alternative, 2) Repair the existing building to current codes and standards, and 3) Construct an additional building at 3900 Alvar Street (Figure 2).

Alternative 1 – No Action

Under the No Action Alternative, there would be no repair, or addition to EMD Central Maintenance and Fuel Facility. Consequently, the New Orleans Police and Fire Departments would be deprived of benefits this facility provided. No Action would forego opportunities to expand necessary services for maintenance and storage of city vehicles.

Alternative 2 – Repair the Existing Building with Upgrades to Current Codes and Standards

This alternative would consist of repairing the pre-existing building to pre-disaster condition with upgrades to current codes and standards. This alternative meets the purpose and need, and will be carried forward for consideration and evaluation

Alternative 3 – Construction of an Additional Building - Proposed Action

The proposed action is for expansion of the EMD Central Maintenance and Fuel Facility which includes construction of a 16,900 sq storage and maintenance building at 3900 Alvar Street. This action would include site preparation, building construction, and addition of necessary utilities and appurtenances. Construction of a new facility adjacent to the original location will restore the essential services lost as a result of Hurricane Katrina by providing much needed storage and upkeep for CNO police department, fire department, and city maintenance vehicles.

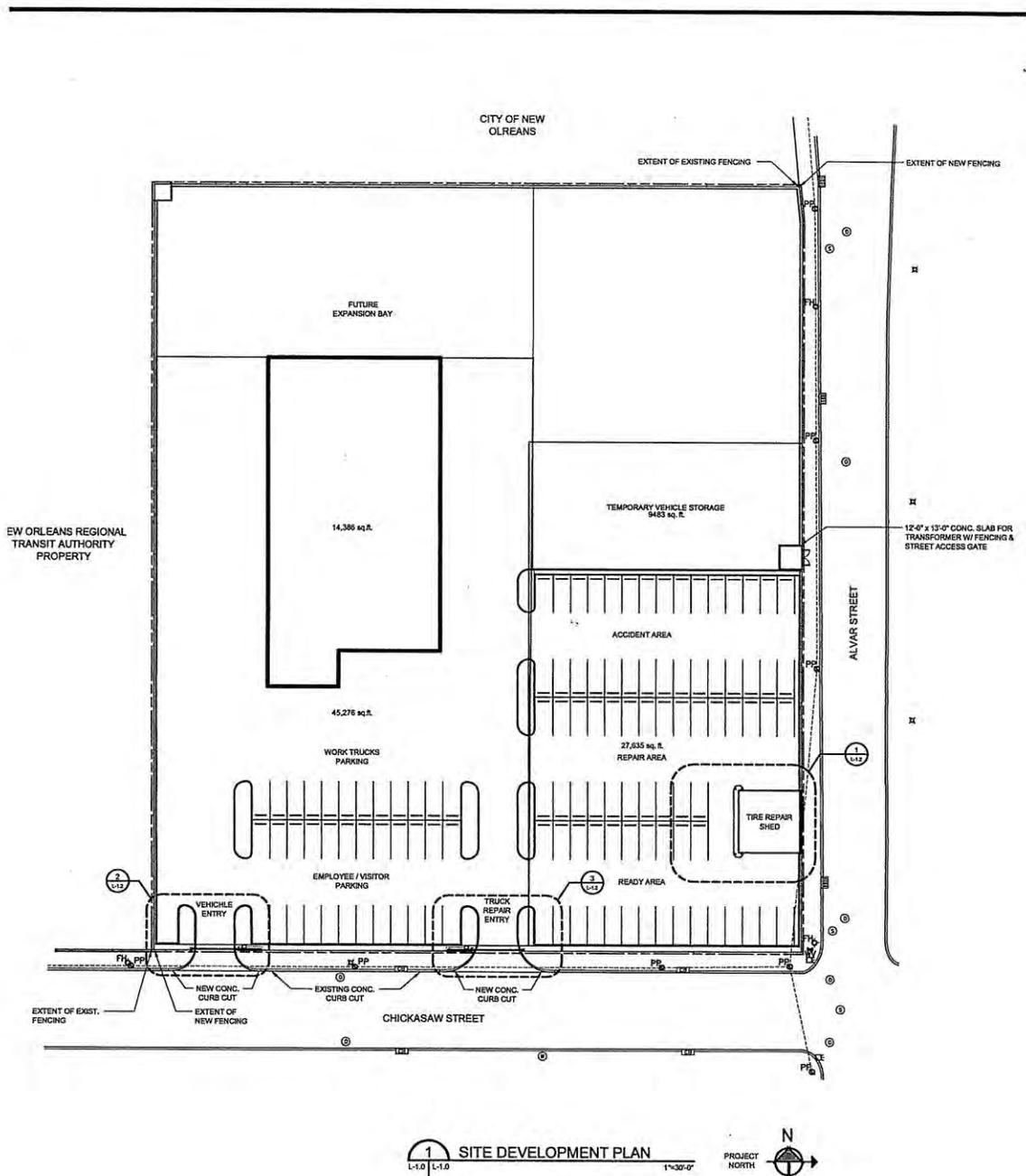


Figure 3 – Site plans

4.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL IMPACTS

4.1 Wetlands and Waters of the United States

4.1.1 Regulatory

The United States Army Corps of Engineers (USACE) regulates the discharge of dredged or fill material into waters of the U.S., including wetlands, pursuant to §§ 401 and 404 of the Clean Water Act (CWA). Section 402 of the CWA, entitled, National Pollutant Discharge Elimination System (NPDES), authorizes and sets forth standards for state administered permitting programs regulating the discharge of pollutants into navigable waters within the state's jurisdiction.

Wetlands are identified as those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. The USACE also regulates the building of structures in waters of the U.S. pursuant to §§ 9 and 10 of the Rivers and Harbors Act (RHA). Executive Order (EO) 11990, Protection of Wetlands, directs Federal agencies to minimize the destruction, loss, or degradation of wetlands and to preserve and enhance the values of wetlands for federally funded projects. FEMA regulations for complying with EO 11990 are found at 44 CFR, Part 9, Floodplain Management and Protection of Wetlands.

4.1.2 Existing Conditions

The proposed project site is located in an urban, previously-disturbed site with no evidence of wetlands or other waters of the U.S. The industrial canal, a marine subtidal environment, is located approximately ¼ mile to the east of the proposed project location. According to the U.S. Fish & Wildlife Service (USFWS) National Wetlands Inventory (NWI) map, there are no wetlands that occur within or near the proposed project area (Figure 3) (USFWS, 2013). The pre-existing and proposed locations exhibit little to no relief, although ground elevation gradually increases from 0 feet at the proposed project site to 10 feet near the banks of the Mississippi River, located approximately 2.5 miles to the south (USGS, 2013). Stormwater runoff evacuates the site via the city's underground sewer system.

Furthermore, a Department of the Army permit under Section 404 of the CWA would not be required for the deposition or redistribution of dredged or fill material on the proposed project site (Appendix B).

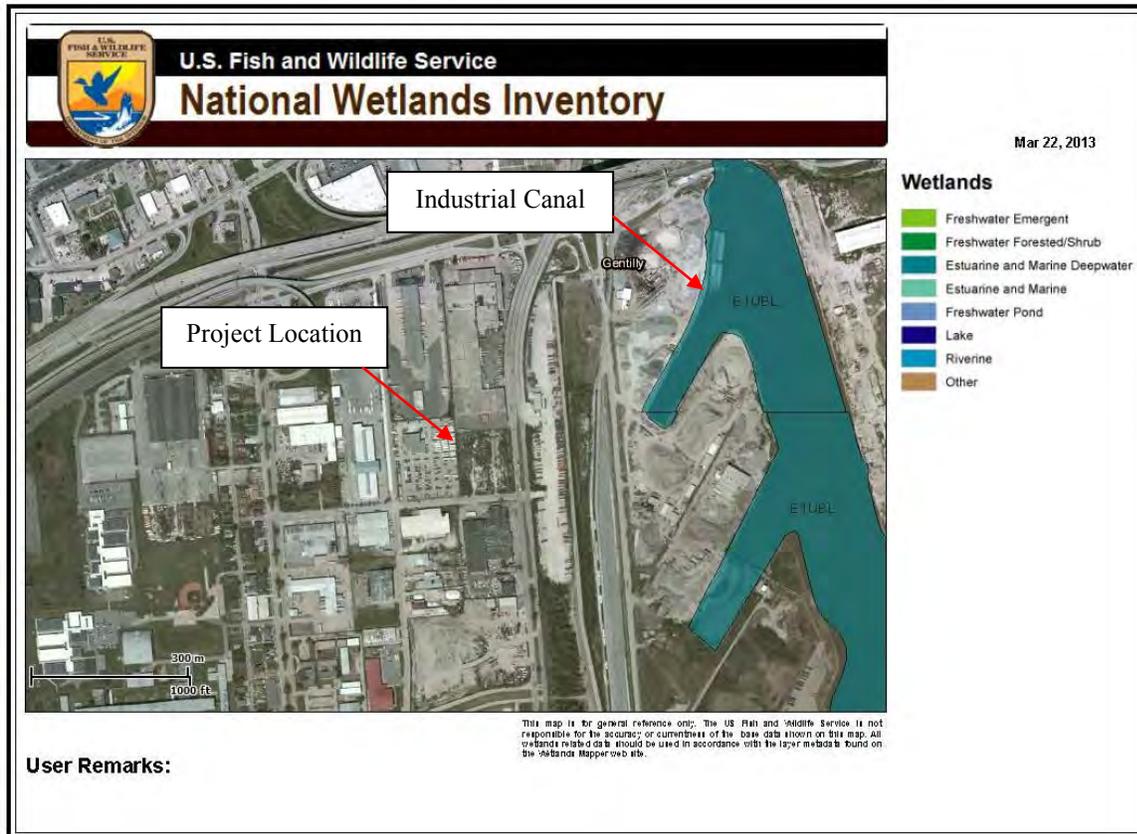


Figure 4 - U. S. Fish and Wildlife Service National Wetlands Inventory Map (USFWS, 2012)

4.1.3 Environmental Consequences

Alternative 1 – No Action

The No Action Alternative would have no impact on wetlands or waters of the U.S. and would not require permits under Section 404 of the CWA or Section 10 of the RHA.

Alternative 2 – Repair the Existing Building with Upgrades to Current Codes and Standards

Repair of the EMD Central Maintenance and Fuel Facility would have no impact on wetlands or waters of the U.S. The proposed location is an urban, previously-disturbed site, and is not a wetland under EO 11990. The scope of work would not require permits under Section 404 of the CWA or Section 10 of the RHA.

Alternative 3 – Construction of an Additional Building - Proposed Action

In a letter dated March 22, 2013, the USACE did not anticipate any adverse impacts to any USACE projects nor did the proposed project site appear to be located in a wetland subject to the USACE’s jurisdiction. Therefore, FEMA has determined that the proposed location is an urban, previously-disturbed site, and is the proposed location is not a jurisdictional wetland under EO 11990, and the project as proposed would not require permits under Section 404 of the CWA or Section 10 of the RHA.

Although FEMA has determined the proposed location is an urban, previously disturbed site, and is not a wetland under Executive Order 11990, the contractor should implement best management practices (BMPs) that meet LDEQ permitting specifications for storm water discharge regulated under §§ 401 and 402 of the CWA to minimize impacts to any waters of the United States. This includes designing the site with specific construction measures to reduce or eliminate stormwater run-off impacts. Additionally, hazardous materials associated with construction equipment should be handled according to local, state, and federal regulations in order to minimize the risk of spills and leaks and subsequent impacts to surface and groundwater resources.

4.2 Floodplains

4.2.1 Regulatory

EO 11988 requires federal agencies to avoid direct or indirect support or development within the 100-year floodplain whenever there is a practicable alternative. FEMA's regulations for complying with EO 11988 are found at 44 CFR Part 9, Floodplain Management and Protection of Wetlands.

4.2.2 Existing Conditions

In July 2005, FEMA initiated a series of flood insurance studies for many of the Louisiana coastal parishes as part of the Flood Map Modernization effort through FEMA's National Flood Insurance Fund. These studies were necessary because the flood hazard and risk information shown on many Flood Insurance Rate Maps (FIRMs) were developed during the 1970's, and the physical terrain had changed significantly, such as major loss of wetland areas. After hurricanes Katrina and Rita, FEMA expanded the scope of work to include all of coastal Louisiana. The magnitude of the impacts of hurricanes Katrina and Rita reinforced the urgency to obtain additional flood recovery data for the coastal zones of Louisiana. More detailed analysis was possible because new data obtained after the hurricanes included information on levees and levee systems, new high-water marks, and new hurricane parameters (LaMP 2007).

During an initial post-hurricane analysis, FEMA determined that the "100-Year" or 1-percent chance storm flood elevations on FIRMs for many Louisiana communities, referred to as Base Flood Elevations (BFEs), were too low. FEMA created recovery maps showing the extent and magnitude of hurricanes Katrina's and Rita's surge, as well as information on other storms over the past 25 years (LaMP 2007). The 2006 advisory flood data shown on the recovery maps for the Louisiana-declared disaster areas show high-water marks surveyed after the storm; flood limits developed from these surveyed points; and Advisory Base Flood Elevations, or (ABFEs). The recovery maps and other advisory data were developed to assist parish officials, homeowners, business owners, and other affected citizens with their recovery and rebuilding efforts (LaMP 2007).

Updated preliminary flood hazard maps from an intensive five-year mapping project guided by FEMA were provided to all Louisiana coastal parishes. The maps released in early 2008, known as Preliminary Digital Flood Insurance Rate Maps (DFIRMs), were based on the most

technically advanced flood insurance studies ever performed for Louisiana, followed by multiple levels of review. The DFIRMs provided communities with a more scientific approach to economic development, hazard mitigation planning, emergency response and post-flood recovery (LaMP 2007).

The USACE is currently working on the Hurricane and Storm Damage Risk Reduction System (HSDRRS) for the Greater New Orleans (GNO) area (Miller 2011). This 350-mile system of levees, floodwalls, surge barriers, and pump stations will reduce the flood risk associated with a storm event. In September of 2011, the USACE provided FEMA with assurances that the HSDRRS is capable of defending against a storm surge with a one percent (1%) annual chance event of occurring in any given year (Miller 2011). The areas protected include portions of St. Bernard, St. Charles, Jefferson, Orleans, and Plaquemines parishes. FEMA has revised the preliminary DFIRMs within the HSDRRS to incorporate the reduced flood risk associated with the system improvements.

The 2012 Revised Preliminary DFIRMs – currently viewed as the best available flood risk data for the five GNO parishes. In many areas, the flood risk has been significantly reduced due to heightened protection. 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 (NFIP) (Miller 2011).

In compliance with FEMA policy implementing EO 11988, the proposed project was reviewed for possible impacts associated with occupancy or modification to a floodplain. Orleans Parish enrolled in the NFIP on August 3, 1970.

4.2.3 Environmental Consequences

Alternative 1 – No Action

The No Action Alternative would not entail any repair or expansion of the EMD Central Maintenance and Fuel Facility. This would have no further adverse impacts to the floodplain.

Alternative 2 – Repair the Existing Building with Upgrades to Current Codes and Standards

Per Revised Preliminary Digital Flood Insurance Rate Map (Revised DFIRM) Panel Number 22071C0232 F, dated 11/9/2012, the site is located within shaded Zone X: areas of 0.2% annual chance flood; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from the 1% annual chance flood.

Project is within a levee protected area of the 100-yr floodplain. Repair of the EMD Central Maintenance and Fuel Facility to pre-disaster configuration would have no determinable impact on flood elevations.

Per 44 CFR 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 NFIP. The applicant is required to coordinate with the local floodplain administrator regarding floodplain permit(s) prior to the start of any activities. All coordination

pertaining to these activities and applicant compliance with any conditions should be documented and copies forwarded to the LA GOHSEP and FEMA for inclusion in the permanent project files.

Alternative 3 – Construction of an Additional Building - Proposed Action

Per Revised Preliminary Digital Flood Insurance Rate Map (Revised DFIRM) Panel Number 22071C0232 F, dated 11/9/2012, the site is located within shaded Zone X: areas of 0.2% annual chance flood; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from the 1% annual chance flood.

Project is within a levee protected area of the 100-yr floodplain. Reconstruction of the EMD Central Maintenance Facility at the proposed location would have no determinable impact on flood elevations.

Per 44 CFR 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 NFIP. The applicant is required to coordinate with the local floodplain administrator regarding floodplain permit(s) prior to the start of any activities. All coordination pertaining to these activities and applicant compliance with any conditions should be documented and copies forwarded to the LA GOHSEP and FEMA for inclusion in the permanent project files.

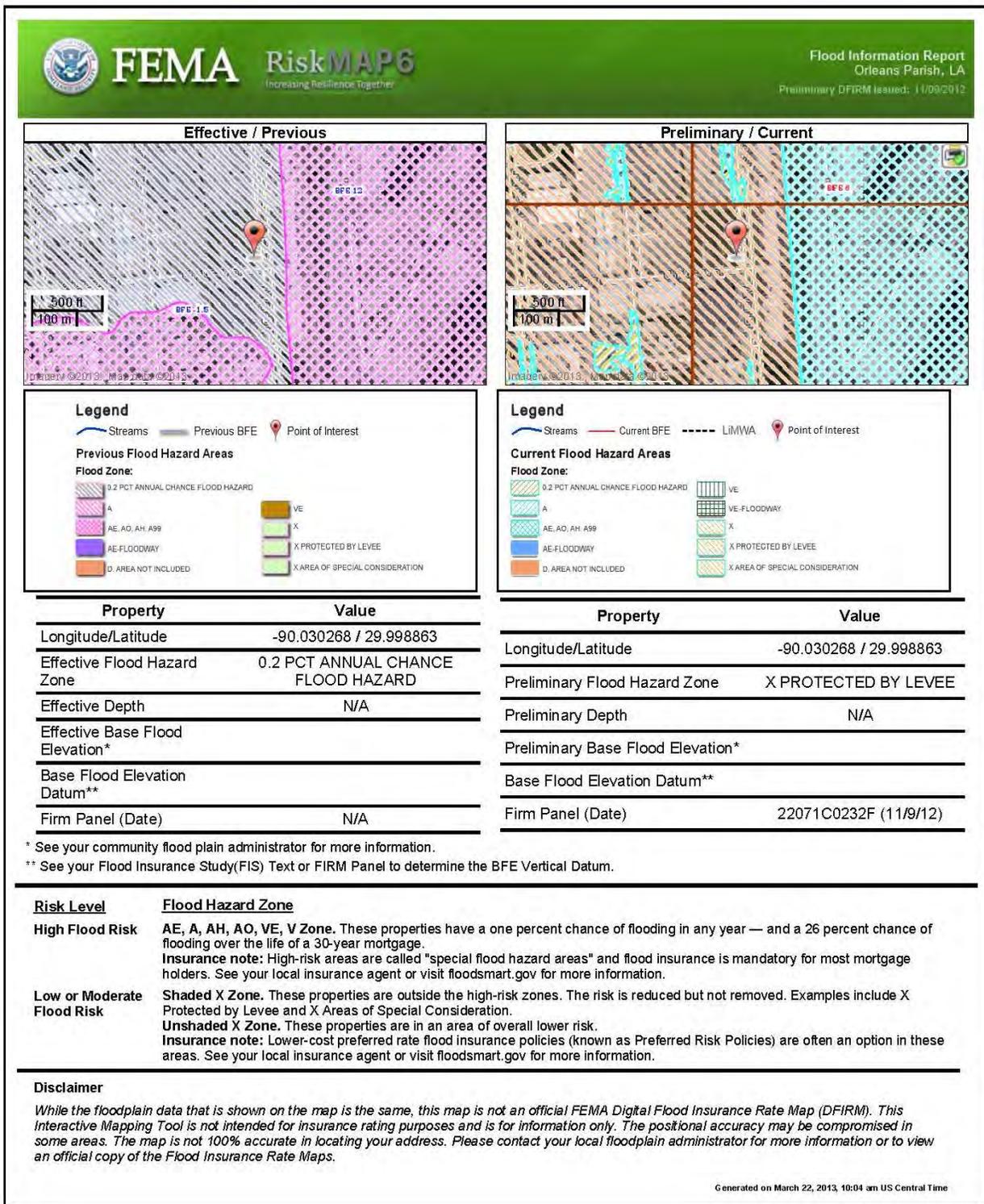


Figure 5 – Revised Preliminary Digital Flood Insurance Rate Map Panel 22071C0232F

4.3 Coastal Resources

4.3.1 Regulatory

The Coastal Zone Management Act of 1972 (CZMA) requires federal agency actions to be consistent with the policies of the state coastal zone management program when conducting or supporting activities that affect a coastal zone. The Louisiana Department of Natural Resources (LDNR) regulates development in Louisiana's designated coastal zone through the Coastal Use Permit Program.

The USFWS regulates federal funding in Coastal Barrier Resource System (CBRS) units under the Coastal Barrier Resources Act (CBRA). CBRA protects undeveloped coastal barriers and related areas (*i.e.*, Otherwise Protected Areas) by prohibiting direct or indirect federal funding of projects that support development in these areas. CBRA promotes appropriate use and conservation of coastal barriers along the Gulf of Mexico.

4.3.2 Existing Conditions

The existing facility and the proposed project site are located in the coastal zone and may be required to obtain a Coastal Use Permit (CUP) prior to construction (Appendix A). The proposed project site is not located within a regulated CBRS unit.

4.3.3 Environmental Consequences

Alternative 1 – No Action

The No Action Alternative would entail no undertaking and therefore, would have no impact on a coastal zone or a CBRS unit.

Alternative 2 – Repair the Existing Building with Upgrades to Current Codes and Standards

Repair of EMD Central Maintenance and Fuel Facility to pre-disaster condition would involve construction in a designated coastal zone. Per letter from LDNR Office of Coastal Management dated March 3, 2013, the granting of federal financial assistance as defined in 15 CFR §930.91 is fully consistent with the Louisiana Coastal Resources Program (LCRP). Consistency with the LCRP does not exempt applicants from the need to obtain a Coastal Use Permit if required. CNO is responsible for coordinating with LDNR Office of Coastal Development to obtain any Coastal Use Permit that may be required as a result of this project. The project site is not located within a CBRS unit; therefore CBRA does not apply.

Alternative 3 – Construction of an Additional Building - Proposed Action

The proposed action alternative would involve construction in a designated coastal zone. Per letter from LDNR Office of Coastal Management dated March 3, 2013, the granting of Federal financial assistance as defined in 15 CFR §930.91 is fully consistent with the Louisiana Coastal Resources Program (LCRP). Consistency with the LCRP does not exempt applicants from the need to obtain a Coastal Use Permit if required. CNO is responsible for coordinating with LDNR Office of Coastal Development to obtain any Coastal Use Permit that may be required as a result of this project.

4.4 Biological Resources

4.4.1 Regulatory

The Endangered Species Act (ESA) of 1973 prohibits the taking of listed, threatened, and endangered species unless specifically authorized by permit from the USFWS or the National Marine Fisheries Service (NMFS). “Take” is defined in ESA Section 3 as “to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect or attempt to engage in any such conduct”. “Harm” is further defined by the ESA regulations to include significant habitat modification or degradation that results in death or injury to listed species by significantly impairing behavioral patterns such as breeding, feeding, or sheltering.

4.4.2 Existing Conditions

One mammal species, the West Indian manatee, and two fish species, the Gulf sturgeon and pallid sturgeon, are federally listed as threatened or endangered and are known to occur in select waterways of Orleans Parish (Table 1). An individual bird species, Sprague’s Pipit, is federally listed as a Candidate species and may occur in the vicinity of the proposed project (Table 1). Current data suggests its non-breeding, overwintering range extends from central Louisiana westward to Texas, south to Mexico and northward including the southern regions of New Mexico and Arizona (Robbins and Dale, 1999).

Common Name	Scientific Name	Federal Status	Critical Habitat	Habitat Requirements	Impact* / Rationale
Birds					
Sprague's Pipit	<i>Anthus spragueii</i>	Candidate	No	Grassland bird that overwinters during its non-breeding season from western Louisiana to Mexico and southwestern states.	None / Project area is outside the suggested overwintering range of this species.
Fishes					
Gulf sturgeon	<i>Acipenser oxyrinchus desotoi</i>	Threatened	Yes ³	Anadromous fish species that spends most of its life in freshwater habitats and spawns in estuarine bays. Found in a variety of substrate areas based on age class of species.	None / Project area is located downstream of critical habitat areas. Any potential storm runoff would not impact this species.

Common Name	Scientific Name	Federal Status	Critical Habitat	Habitat Requirements	Impact* / Rationale
Pallid sturgeon	<i>Scaphirhynchus albus</i>	Endangered	No	Prefers large. Free-flowing turbid rivers. No information exists on preferred spawning habitat.	None / Less than significant impact could occur from storm runoff without proper BMPs in place at storm drain locations.
Mammals					
West Indian manatee	<i>Trichechus manatus</i>	Endangered	Yes ¹	Found in marine, estuarine, and freshwater environments with a strong preference for warm and well vegetated waters.	None / There are no habitat areas that are close or hydrologically connected to potential habitat.
<p>* Considers potential impacts of Alternatives 1 - 3. 1 Critical habitat is not designated in Louisiana. 2 Critical habitat is designated in Louisiana, but does not occur within Orleans Parish. 3 Species may occur in Orleans Parish, but not within the proposed project area.</p>					

- Data accessed 4/23/2012 from USFWS IPaC Web Portal (<http://ecos.fws.gov/ipac/>)

Table 1 - Federally Listed Species Known to Occur in Orleans Parish

4.4.3 Environmental Consequences

Alternative 1 – No Action:

The No Action Alternative would entail no undertaking and therefore, would have no impact on species federally listed as threatened or endangered.

Alternative 2 – Repair the Existing Building with Upgrades to Current Codes and Standards

Repair of EMD Central Maintenance and Fuel Facility to pre-disaster condition would have no on species federally listed as threatened or endangered, migratory birds or federally listed critical habitats. The US Fish and Wildlife Service has interpreted Section 7(p) of the Endangered Species Act to mean that restoring any infrastructure damaged or lost due to the hurricane back to its original footprint does not require ESA consultation per USFWS letter of September 15, 2005.

Alternative 3 – Construction of an Additional Building - Proposed Action

Inspection of the proposed site did not indicate the presence of any species federally listed as threatened or endangered. In Correspondence dated March 8, 2013, the Louisiana Department of Wildlife and Fisheries (LDWF) stated that no impacts to rare, threatened, or endangered species or critical habitats are anticipated for the proposed project (Appendix B). In correspondence dated March 11, 2013, the USFWS stated that the proposed project would have no effect on federal trust resources under its jurisdiction and currently protected by the ESA. (Appendix B).

4.5 Cultural Resources

4.5.1 Regulatory

The consideration of impacts to historic and cultural resources is mandated under Section 101(b)4 of the National Environmental Policy Act (NEPA) as implemented by 40 CFR Part 1501-1508. Section 106 of the National Historic Preservation Act (NHPA) requires Federal agencies to take into account their effects on historic properties (i.e. historic and cultural resources) and allow the Advisory Council on Historic Preservation an opportunity to comment. FEMA has chosen to address potential impacts to historic properties through the “Section 106 consultation process” of NHPA as implemented through 36 CFR Part 800.

4.5.2 Existing Conditions

In order to fulfill its Section 106 responsibilities, FEMA has initiated consultation on this project in accordance with the Statewide Programmatic Agreement (PA) dated August 17, 2009, and amended on July 22, 2011, between the Louisiana State Historic Preservation Officer (SHPO), the Louisiana Governor’s Office of Homeland Security and Emergency Preparedness (LA GOHSEP), the Alabama-Coushatta Tribe of Texas, the Caddo Nation, the Chitimacha Tribe of Louisiana, the Choctaw Nation of Oklahoma, the Coushatta Tribe of Louisiana, the Jena Band of Choctaw Indians, the Mississippi Band of Choctaw Indians, the Quapaw Tribe of Oklahoma, the Seminole Nation of Oklahoma, the Seminole Tribe of Florida, the Tunica-Biloxi Tribe of Louisiana, and the Advisory Council on Historic Preservation (ACHP). The PA was created to streamline the Section 106 review process.

The “Section 106 process” outlined in the PA requires the identification of historic properties that may be affected by the proposed action or alternatives within the project’s area of potential effects (APE). Historic properties, defined in Section 101(a)(1)(A) of NHPA, include districts, sites (archaeological and religious/cultural), buildings, structures, and objects that are listed in or determined eligible for listing in the National Register of Historic Places (NRHP). Historic properties are identified by qualified agency representatives in consultation with interested parties. Below is a consideration of various alternatives and their effects on historic properties.

4.5.3 Environmental Consequences

Alternative 1 – No Action Alternative

The No Action Alternative does not include any FEMA undertaking; therefore FEMA has no further responsibilities under Section 106 of the NHPA.

Alternative 2 – Repair the Existing Building with Upgrades to Current Codes and Standards

Based on research using the NRHP database, the Louisiana Cultural Resources Map on the Louisiana Division of Historic Preservation’s website, and agency files, FEMA has determined that the project area is not located within a listed National Register Historic District nor is it located within view-shed of a property individually listed in the NRHP. The facility was constructed after 1966 and so is less than 50 years of age and it does not exhibit the significance to qualify for listing under Criterion Consideration G. FEMA determined that the undertaking

would have “No Effect” to Historic Properties. SHPO concurrence with this determination was received, dated March 6, 2013. Consultation with affected tribes (Alabama-Coushatta Tribe of Texas, Choctaw Nation of Oklahoma, Coushatta Tribe of Louisiana, Jena Band of Choctaw Indians, Mississippi Band of Choctaw Indians, Muscogee Creek Nation, Quapaw Tribe of Oklahoma, Seminole Nation of Oklahoma, Seminole Tribe of Florida, and Tunica-Biloxi Tribe of Louisiana) was conducted per the PA and 36 CFR part 800.2(c)(2)(i)(B). None of the Tribes objected within the regulatory timeframes; therefore, in accordance with Stipulation VIII.E(1) of the PA and 36 CFR part 800.5(c)1, FEMA may proceed with funding the undertaking assuming concurrence. The applicant must comply with the NHPA conditions set forth in this EA (Louisiana Unmarked Human Burial Sites Preservation Act and Inadvertent Discovery Clause).

Alternative 3 – Construction of an Additional Building - Proposed Action

Based on research using the NRHP database, the Louisiana Cultural Resources Map on the Louisiana Division of Historic Preservation’s website, and agency files, FEMA has determined that the project area is not located within a listed National Register Historic District nor is it located within view-shed of a property individually listed in the NRHP. The facility was constructed after 1966 and is less than 50 years of age and it does not exhibit the significance to qualify for listing under Criterion Consideration G. In addition, there are no existing standing structures within the APE of the new construction. Based upon the same research, there are six (6) recorded archaeological sites located within 1.6 km (1.0 mi) of the project area; however the sites are not within the archaeological APE and will not be affected by the undertaking. FEMA determined that the undertaking would have “No Effect” to Historic Properties. SHPO concurrence with this determination was received, dated March 6, 2013. Consultation with affected tribes (Alabama-Coushatta Tribe of Texas, Choctaw Nation of Oklahoma, Coushatta Tribe of Louisiana, Jena Band of Choctaw Indians, Mississippi Band of Choctaw Indians, Muscogee Creek Nation, Quapaw Tribe of Oklahoma, Seminole Nation of Oklahoma, Seminole Tribe of Florida, and Tunica-Biloxi Tribe of Louisiana) was conducted per the PA and 36 CFR part 800.2(c)(2)(i)(B). None of the Tribes objected within the regulatory timeframes; therefore, in accordance with Stipulation VIII.E(1) of the PA and 36 CFR part 800.5(c)1, FEMA may proceed with funding the undertaking. The applicant must comply with the NHPA conditions set forth in this EA (Louisiana Unmarked Human Burial Sites Preservation Act and Inadvertent Discovery Clause).

4.6 Hazardous Materials

4.6.1 Regulatory

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.

4.6.2 Existing Conditions

A Phase II Environmental Site Assessment (PIESA) was conducted in April 2009 under contract to the City of New Orleans Capital Projects Administration by Materials Management Group, Inc. (MMG) to determine whether contamination existed at the site prior to redevelopment as the new EMD facility (as part of the FEMA-funded recovery projects for the City of New Orleans). The analytical results indicated that constituents of concern (COCs) Total Petroleum Hydrocarbon as Diesel (TPH-D), poly-aromatic hydrocarbons (PAH), arsenic, and lead were present in the surface soil above the limiting Risk Evaluation / Corrective Action Plan (RECAP) screening standards. In addition, TPH-D and arsenic were detected in the groundwater.

Based on the PIESA results, a RECAP Site Assessment was conducted in July 2009 to define the nature and extent of soil and groundwater contamination (self-implementation on behalf of the CNO). The site was managed under the RECAP Screening Option, which is the Limiting Screening Standard (LSS). The site was then managed under the Management Option 1 (MO1) this is the RECAP Screening Option at the maximum concentration of the LSS for the COC. The results indicated that soil concentrations of benzo(a)pyrene, arsenic, and lead in the surface interval areas required remediation (concentrations exceeded the limiting RECAP standards for industrial use), and that groundwater was not impacted.

In December of 2009, LDEQ requested additional assessment under RECAP based on the need to investigate enclosed space scenarios and to further define the vertical extent of contamination at the site. The site was again managed under the RECAP Screening Option as well as MO1. The findings were that PAH concentrations exceeded the limiting RECAP standards in the surface interval in the building footprint area. Based on MO-1 evaluation, only benzo(a)pyrene and dibenz(a,h)anthracene exceeded the limiting RECAP standards.

In June of 2012, LDEQ approved the reports for the 2009 RECAP Site Assessment(s) and requested that a Corrective Action Plan (CAP) be prepared by MMG based on the findings in the RECAP (Appendix A). The CAP describes the remedial design to be implemented at the site prior to site reuse. MMG proposes to excavate and dispose of the impacted surface soils with elevated concentrations of PAHs and metals. The remediation will consist of excavating the contaminated soils down to four or six feet below ground surface and the excavated soils will be transported to a LDEQ approved landfill. The excavation areas will be lined with poly sheeting and backfilled with clean fill.

4.6.3 Environmental Consequences

Alternative 1 – No Action Alternative

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

Alternative 2 – Repair the Existing Building with Upgrades to Current Codes and Standards

Studies have not been conducted for hazardous materials, wastes, or substances at the original site. If hazardous constituents are 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.

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. BMPs 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.

Alternative 3 – Construction of an Additional Building - Proposed Action

A PIIESA and 2 RECAP site assessments were conducted due to the proposed location's history of storing CNO vehicles. Per these environmental site assessments, remediation of the site is needed due to the findings of contamination.

Project construction may involve the use of hazardous materials (*e.g.*, petroleum products including but not limited to gasoline, diesel, brake and hydraulic fluids, cement, caustics, acids, solvents, paints, electronic components, pesticides/herbicides, fertilizers, and treated timber) and may result in the generation of small volumes of hazardous wastes. BMPs 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.

If additional 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.

4.7 Environmental Justice

4.7.1 Regulatory

EO 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 and/or low-income populations.

4.7.2 Existing Conditions

Information obtained from the U.S. Census Bureau Fact Finder website for New Orleans zip code 70117 indicates population percentages in 2010 were as follows: 75 percent black, 21 percent white, 3.7 percent Hispanic, 0.5 percent Asian, and 0.4 percent Native American. The 2007-2011 American Community Survey five-year median household income for New Orleans zip code 70117 is \$23,621 (in 2011 inflation-adjusted dollars) and the 2010 median household income for the New Orleans Metropolitan Area, which includes Kenner and Metairie, is \$46,134 (U.S. Census Bureau, 2010).

4.7.3 Environmental Consequences

The goal of environmental justice is to identify and address potential disproportionately high and adverse human health and environmental effects on minority populations and low income populations, including interrelated social and economic effects, and to identify alternatives that may mitigate the impacts. This section will investigate the consequences as required by EO 12898.

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 – Repair the Existing Building with Upgrades to Current Codes and Standards

Repair of EMD Central Maintenance and Fuel Facility to current codes and standards would have no disproportionate adverse impacts to low-income or minority populations. The proposed facility would benefit the public servants of New Orleans, and assist them in serving and protecting the entire community.

Alternative 3 – Construction of an Additional Building - Proposed Action

The proposed action will not have disproportionate adverse human health, economic, or social effects on minority or low income populations. The proposed facility would benefit the public servants of New Orleans, and assist them in serving and protecting the entire community. Therefore, there will be no disproportionate adverse impacts to low-income or minority populations.

5.0 CUMULATIVE IMPACTS

According to the CEQ regulations, cumulative impacts represent the impact on the environment that results from the incremental impact of federally funded actions 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 impacts can result from individually minor but collectively significant actions taking place over a period of time (40 CFR 1508.7).

In accordance with NEPA, and to the extent reasonable and practical, this EA considered the combined effects of the Proposed Action alternative and other actions occurring in the vicinity of

the proposed project site. The entire Louisiana Gulf Coast is undergoing recovery efforts after the 2005 hurricane season, including demolition, reconstruction, and new construction, both within the private sector as well as federal and state government sectors. There are numerous repair projects to buildings, roads, recreational facilities, and public utilities to restore pre-disaster conditions surrounding the project site. Additionally, the community is undergoing restoration and repair using non-FEMA funding. The cumulative impact of the proposed action would be minimal and may benefit the human environment.

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 CNO prior to and during project implementation.

- In accordance with applicable local, state, and federal regulations, the applicant would be responsible for acquiring any necessary permits prior to commencing construction at the proposed project site.

- Louisiana Unmarked Human Burial Sites Preservation Act:

If human bone or unmarked grave(s) are present within the project area, compliance with the Louisiana Unmarked Human Burial Sites Preservations Act (R.S. 8:671 ET SEQ.) is required. The applicant shall notify the law enforcement agency of the jurisdiction where the remains are located within twenty-four hours of the discovery. The applicant shall also notify FEMA and the Louisiana Division of Archaeology at 225-342-8170 within seventy-two (72) hours of the discovery.

- Inadvertent Discovery Clause:

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

- Project construction would involve the use of potentially hazardous materials (*e.g.*, petroleum products including but not limited to gasoline, diesel, brake and hydraulic fluid, 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, LDNR requires that a complete Coastal Use Permit Application package (Joint Application

Form, locality maps, project illustration plats with plan and cross section views) along with the appropriate application fee be submitted to their office prior to construction.

- Unusable equipment, debris and material shall be disposed of in an approved manner and location. Applicant is responsible to ensure potential hazardous materials, if any, shall be removed, handled, transported and disposed of in accordance with local, State and Federal compliance requirements.
- Contractor and/or Subcontractors will properly handle, package, transport and dispose of hazardous materials and/or waste in accordance with all local, state and federal regulations, laws and ordinances including all OSHA worker exposure regulations covered within 29 CFR 1910 and 1926.
- All waste is to be transported by an entity maintaining a current "waste hauler permit" specifically for the waste being transported, as required by Louisiana Department of Transportation and Development (DOTD) and other regulations.
- Applicant must comply with all local, State and Federal requirements related to sediment control, disposal of solid waste, control and containment of spills, discharge of surface runoff and stormwater from the site.
- If any asbestos containing materials, lead based paint, and/or other hazardous materials are found during remediation or repair activities, the applicant shall comply with all local, state and federal abatement and disposal requirements under the National Emissions Standards for Hazardous Air Pollutants (NESHAP) and Louisiana Administrative Code 33:III 5151. Demolition activities related to Possible Asbestos-Containing Materials (PACM) must be inspected for ACM/PACM where it is safe to do so. Should asbestos containing materials (ACM) be present, the applicant is responsible for ensuring proper disposal in accordance with the previously referenced regulations. LDEQ must be notified of demolition activity prior to work commencing. All coordination pertaining to these activities should be documented and copies forwarded to the state and FEMA as part of the permanent project files.

7.0 PUBLIC INVOLVEMENT AND AGENCY CONSULTATIONS

FEMA is the lead federal agency for conducting the NEPA compliance process for this Environmental Assessment and FEMA Public Assistance grant funded 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 mandated 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 Governor's Office of Homeland Security and Emergency Preparedness, Louisiana Department of Environmental Quality, U. S. Environmental Protection Agency, Louisiana Department of Natural Resources, U. S. Army Corps of Engineers, and National Oceanic & Atmospheric Administration National Marine Fisheries Service. 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. In accordance with applicable local, state, and federal regulations, the applicant would be responsible for acquiring any necessary permits prior to commencing construction at the proposed project site. 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 New Orleans Public Library located at 219 Loyola Ave. New Orleans, LA 70112. A copy of the Public Notice is attached in Appendix B.

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DRAFT

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Appendix A

Corrective Action Plan

Note: Corrective Action Plan is included in the PDF version of this document



*Corrective Action Plan, AI# 165655
3900 Alvar St., New Orleans, LA*

Site Location:
3900 Alvar St.
New Orleans, Louisiana

For:
Corrective Action

City of New Orleans

Capital Projects
Administration

June 2012



**Materials Management
Group, Inc.**

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MMG File # 6152-CNO

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Figure 1: Site Location Map

Figure 2: Soil Concentrations Exceeding RECAP SS

Figure 3: Proposed Remedial Design

Figure 4: Proposed Site Redevelopment

Appendix A: RECAP Form 11

1.0 Introduction

Under contract to the City of New Orleans Capital Projects Administration (City), Materials Management Group, Inc. (MMG) has prepared this Corrective Action Plan (CAP) for remedial activities to be conducted at the proposed location for the new equipment maintenance and fuel facility, located at 3900 Alvar Street, in New Orleans, Louisiana. The site is the former location for storage of damaged vehicles from the City of New Orleans' fleet. Several investigations have been conducted at the site, including: a Phase II Environmental Site Assessment (PIIESA) in April 2009, a RECAP Site Assessment in July 2009, and additional RECAP Site Assessment in December 2009. The initial RECAP Site Assessment was conducted to define the nature and extent of contamination identified under the PIIESA, while the additional RECAP investigation was conducted at the request of the Louisiana Department of Environmental Quality (LDEQ) based on the proposed site redevelopment plan and the need to investigate enclosed space exposure scenarios as well as to define the vertical extent of contamination in some areas. LDEQ has approved the reports for the 2009 RECAP Site Assessment(s) and requested that this CAP be prepared based on the findings. This plan was prepared in accordance with the LDEQ RECAP document (2003).

2.0 Summary of RECAP Assessment(s)

A RECAP Site Assessment was conducted in July 2009 to define the nature and extent of soil and groundwater contamination identified under the PIIESA conducted in April 2009. At the request of LDEQ, additional assessment under RECAP was conducted in December 2009 to investigate potential enclosed space exposure scenarios based on the proposed site redevelopment and to further define the vertical extent of contamination. Site background as well as the findings of the RECAP assessments and PIIESA are summarized below.

2.1 Background

The site under investigation is the proposed equipment maintenance and fuel facility, located at 3900 Alvar Street, in New Orleans, Louisiana. See Figure 1 for a Site Location Map. The site was the previous location for storage of damaged vehicles from the City of New Orleans' fleet. The site is currently vacant. It is three acres in size and is located on the west side of the Inner Harbor Navigation Canal on Alvar Street (off of Almonaster Avenue) in New Orleans. The site is bordered by commercial and industrial areas on all sides: a furniture warehouse to the north, a storage lot for shipping containers to the east across Alvar Street, an office building to the west, and the City of New Orleans Equipment Maintenance Division (EMD) offices to the south across Chickasaw Street. Contamination at the site consists of polycyclic aromatic hydrocarbons (PAHs), arsenic, lead, and benzene; the presence of the contaminants is likely from small releases from damaged vehicles over time (not the result of one release).

2.2 Results of Site Investigations

PIIESA - April 2009

A Phase II Environmental Site Assessment (PIIESA) was conducted in April 2009 at the request of the Federal Emergency Management Agency (FEMA) to determine whether contamination existed at the site prior to redevelopment as the new EMD facility (as part of the FEMA-funded recovery projects for the City of New Orleans). The analytical results indicated that seven contaminants of concern (COCs) (TPH-D, four PAHs, arsenic, and lead) were present in the surface soil above the limiting RECAP screening standards. Volatile organic compounds (VOCs) were analyzed but were not detected. In addition, diesel and arsenic were detected in the groundwater.

RECAP Site Assessment - July 2009

Based on the PIIESA results, a RECAP site assessment was conducted in July 2009 to define the nature and extent of soil and groundwater contamination (self-implementation on behalf of the City). This investigation involved advancement of seven boreholes for soil sample collection and installation of three monitoring wells for groundwater analysis. Soil boreholes were advanced to nine or 12 feet below ground surface; the deeper borings were used for monitoring well installation. Based on the findings from the PIIESA, the COCs analyzed were extractable petroleum hydrocarbons (EPH), semivolatile organic compounds (SVOCs)/PAHs (depending on location), and RCRA/TAL metals (also depending on location). The site was managed under the RECAP Screening Option as well as Management Option 1. The results indicated that soil concentrations of benzo(a)pyrene, arsenic, and lead in the surface interval in five areas required remediation (concentrations exceeded the limiting RECAP standards for industrial use), and that groundwater was not impacted (diesel and arsenic concentrations were below the limiting RECAP standards).

Additional RECAP Site Assessment - December 2009

Based on the need to investigate enclosed space scenarios and to further define the vertical extent of contamination at the site, LDEQ requested additional assessment under RECAP. This additional investigation involved advancement of four soil borings with two of the boreholes were converted to temporary monitoring wells for groundwater sampling. The COCs for the additional assessment were benzo(a)pyrene at one location for vertical extent (B4a), and volatile petroleum hydrocarbons (VPH), EPH, benzene, toluene, ethyl benzene, and xylene(s)/methyl tert butyl ether (BTEX/MTBE), PAHs, and RECAP metals at the other three boreholes (and for groundwater). The site was again managed under the RECAP Screening Option as well as Management Option 1. The findings were that PAH concentrations exceeded the limiting RECAP standards in the surface interval in the building footprint area (B16 & B17). Benzene was detected at a concentration above the limiting RECAP screening standard, but it was eliminated from consideration under MO-1 evaluation. Based on MO-1 evaluation, only benzo(a)pyrene and dibenz(a,h)anthracene exceeded the limiting RECAP standards. Elevated groundwater concentrations of naphthalene and 2-methylnaphthalene were eliminated under MO-1.

In summary, based on the results of the three subsurface investigations at the site and evaluation under RECAP, there are five COCs in soil that will require further attention

(groundwater does not require further action). These COCs, along with the applicable RECAP standards, are summarized on RECAP Form 11, which is included in Appendix A. These COCs are: arsenic, lead, benzo(a)pyrene, benzo(b)fluoranthene, and dibenz(a,h)anthracene.

3.0 Remedial Design

This Corrective Action Plan (CAP) describes the remedial design to be implemented at the site prior to site reuse (see Figure 4 for proposed site redevelopment). The remedial design will involve excavation of contaminated surface soil in 11 areas (these are boreholes B1, B2, B4, B5, B6, B8, B9, B13, B14, B16, and B17). The scope of work, appropriate regulations, schedule, sampling plan, and quality requirements are discussed in the following sections.

3.1 Scope of Work

The scope of work for implementing the remedial design at the site involves removal of the contaminated soils above the RECAP standards as identified in the Site Investigation Report (September 2009), Site Investigation Report Addendum (January 2010), and Response to LDEQ Conditional Approval (May 2011). All work associated with implementation of this CAP will be performed by MMG or their subcontractors.

3.1.1 Identification of Areas/Media/COCs Requiring Further Action

The areas requiring remediation as identified in the Site Investigation Report and Addendum are the 11 boreholes identified above (B1, B2, B4, B5, B6, B8, B9, B13, B14, B16, and B17). While lead and benzo(a)pyrene were found in nearly every borehole, arsenic and other PAHs (benzo(b)fluoranthene and dibenz(a,h)anthracene) also require remediation in some of these locations. For the purposes of the remedial design, PAHs, arsenic, and lead will be considered at every excavation area (for confirmatory sampling purposes). Furthermore, although benzene was eliminated from concern under MO-1, it will be considered at the B16 and B17 excavations (to be conservative in the building area). Groundwater does not require further action.

3.1.2 Proposed plan of action for the AOI

It is proposed to remove the contaminated surface soil (as summarized above) by excavation. The 11 areas to be excavated are shown in Figure 3.

Briefly:

The areas to be excavated include 11 areas as summarized below:

- The areas around boreholes B1, B2, B5, B6, B8, B9, B13, B14, B16, and B17 will each be excavated to approximately four feet, and will cover an area of approximately four feet by four feet.
- The area around borehole B4 will be excavated to approximately six feet, and will cover an area of approximately four feet by four feet.

Excavation

MMG proposes to excavate and dispose of the impacted surface soils with elevated concentrations of PAHs and metals. The areas of proposed excavation are illustrated in Figure 3. The remediation will consist of excavating the contaminated soils down to four or six feet below ground surface (whichever is applicable as indicated above) within the areas indicated on Figure 3. In previous investigations, the water table has been encountered between 2.5 and 5.5 feet bgs. It is possible that groundwater may enter the excavation pit(s). If that occurs, it will be necessary to remove the water. It may be possible to coordinate with the sewerage and water board to discharge the water in the sanitary sewer (rather than send for disposal).

Excavated soils will be transported to an approved landfill. The previous waste profile for soils at the site (from soil cuttings) has expired. MMG recommends collection of a composite soil sample from cores taken from the 11 excavation areas for TCLP analysis prior to initiation of excavation activities. Approval of the waste profile prior to excavation will allow for direct load out at the site (and eliminates the need to stockpile soil and "double-handle" the soil). It is estimated that about 40 cubic yards of soil will be removed (see Table 1); this is based on 10 excavation areas of four ft by four ft by four ft, and one excavation area of four ft by four ft by six ft.

Table 1: Estimated Volume of Soil to Be Removed

Location	Volume Estimate (cubic yards)	Maximum Excavation Depth (Feet)
Borehole B1 (4'X4')	3.5	4
Borehole B2 (4'X4')	3.5	4
Borehole B4 (4'X4')	5	6
Borehole B5 (4'X4')	3.5	4
Borehole B6 (4'X4')	3.5	4
Borehole B8 (4'X4')	3.5	4
Borehole B9 (4'X4')	3.5	4
Borehole B13 (4'X4')	3.5	4
Borehole B14 (4'X4')	3.5	4
Borehole B16 (4'X4')	3.5	4
Borehole B17 (4'X4')	3.5	4
Total	Approx. 40	6

The excavation areas will be lined with poly sheeting to delineate the limits of the excavation and backfilled with clean fill. This eliminates the potential for water accumulation in the pits as well as safety hazards with open pits while confirmatory soil sample results are pending.

All work associated with the proposed remediation will be conducted in Level D Personal Protective Clothing. During all phases of the project, MMG as well as sub-contractors will adhere to industry standard health and safety and quality assurance / quality control guidelines (see Sections 5 and 6).

Confirmatory Soil Samples

At the completion of the excavation activities, confirmatory soil samples will be obtained and sent to a LELAP-accredited laboratory to be analyzed for the appropriate contaminants of concern as indicated below:

B1, B2, B4, B5, B6, B8, B9, B13, B14: PAHs (SW-846 8270), Arsenic & Lead (SW-846 6010)
B16 & B17: PAHs (SW-846 8270) Arsenic & Lead (SW-846 6010), Benzene (SW-846 5035, 8260)

Confirmatory samples will be obtained from the bottom of the excavation sidewalls and at the center of the excavation pit (see Table 2). The confirmatory sample locations are indicated on Figure 3. If all confirmatory samples are below the established SS or RS as identified in Appendix A, the cleanup will be considered complete.

Table 2: Location of Confirmatory Samples

Location	Number of Confirmatory Samples
B1	4 sidewall, 1 bottom of excavation
B2	4 sidewall, 1 bottom of excavation
B4	4 sidewall, 1 bottom of excavation
B5	4 sidewall, 1 bottom of excavation
B6	4 sidewall, 1 bottom of excavation
B8	4 sidewall, 1 bottom of excavation
B9	4 sidewall, 1 bottom of excavation
B13	4 sidewall, 1 bottom of excavation
B14	4 sidewall, 1 bottom of excavation
B16	4 sidewall, 1 bottom of excavation
B17	4 sidewall, 1 bottom of excavation

Backfilling

The excavations will be backfilled with clean pump sand.

Profile Waste, Transportation, and Disposal

Soil from the excavations at the site will require waste characterization analysis by Toxicity Characteristic Leaching Procedure (TCLP) by taking a composite soil sample from cores of surface soil from the 11 areas. The waste will likely be profiled as non-hazardous waste and will be transported by a licensed trucking company to a permitted landfill.

3.2 Specifications for Materials

The proposed remedial plan involves the use of subcontractor-supplied materials in implementing the scope of work. In this case, it is the backfill material following the excavation. There are no other materials to be used under the proposed remedial design. The specifications for the backfill are discussed below.

Backfill

As indicated above, the excavations will be backfilled with clean pump sand. The sand will be ordered from a reputable supplier (likely from the Bonnet Carre Spillway or other known fill supply area) and delivered to the site.

3.3 Applicable or Relevant and Appropriate Requirements (ARARs)

Implementation of the proposed remedial design will be in accordance with all Applicable or Relevant and Appropriate Requirements (ARARs). These include:

- Safety requirements during excavation activities in accordance with OSHA;
- Sampling in accordance with LDEQ RECAP 2003;
- Waste management in accordance with RCRA;
- Waste transportation in accordance with RCRA and DOT.

3.4 Schedule

The remedial design will be carried out under the following schedule:

Item/Deliverable	Date(s)
Submittal of CAP	June 21, 2012
Approval of CAP and Notice to Proceed	August 20, 2012
Preparation of Bid Specifications	October 22, 2012
Request for Proposals/Award of Contract	January 4, 2013
Mobilization	January 28-February 1, 2013
CAP Implementation	February 4-28, 2013
Final Report & Request for NFA-ATT	April 1, 2013
Approval of Final CAP Report & NFA-ATT	June 3, 2013

4.0 Sampling and Analysis Plan

The proposed remedial design involves collection of confirmatory samples from the excavation pits. The sampling and analysis will be conducted in accordance with LDEQ RECAP requirements as well as MMG's standard operating procedures as described below.

4.1 Project Organization

Completion of the remedial activities will involve interaction between the City and its contractor, MMG. The major team members are listed below. These individuals will interface at critical times for significant decisions. The key team members are listed by organization below.

City of New Orleans, Capital Projects Administration

Cedric Grant	Deputy Mayor-Facilities/Infrastructure/ Community Development	(504) 658-4000
Jim Lynch	Project Manager	(504) 658-8608

Materials Management Group, Inc.

C. Paul Lo	President	(504) 237-5172
Karly Gibbs	Project Manager	(504) 450-2523

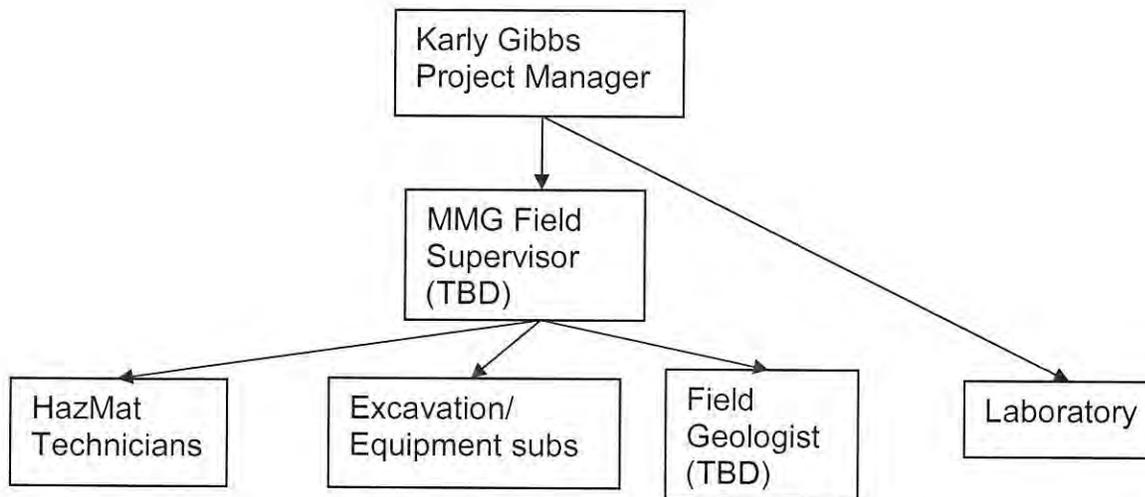
MMG Subcontractors

Accutest Laboratories, Inc.

Amy Jackson	Project Manager	(337) 237-4775
-------------	-----------------	----------------

Other subcontractors to be determined.

MMG's organization under the project will be as follows:



Other individuals that have an interest in the outcome of the remediation are indicated below.

LDEQ

Thomas Harris	Admin., Remediation Services	(225) 219-3236
Adrienne Gossman	Team Leader	(504) 736-7763

City of New Orleans

Mitch Landrieu	Mayor	(504) 658-4015
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4.2 Sample Collection

Sample collection will involve confirmatory sampling from the excavation pits. As described in Section 3.1.2, confirmatory samples will be obtained from the bottom of the excavation sidewalls and at the center of the excavation pits (see Table 2 in Section 3.1.2). The confirmatory sample locations are indicated on Figure 3.

Samples will be collected using disposable sample trowels and will be placed in the appropriate container from the laboratory. Samples will be sent to a Louisiana Environmental Laboratory Accreditation Program (LELAP)-accredited laboratory for analysis. Soil samples collected from the B1, B2, B4, B5, B6, B8, B9, B13, and B14 excavation areas will be analyzed for arsenic, lead, and PAHs. Soil samples collected from the B16 and B17 excavation areas will be analyzed for arsenic, lead, PAHs, and benzene. Split samples and matrix spike/matrix spike duplicate samples will be collected to meet quality assurance requirements. Rinsate blanks will not be collected since disposable sample equipment will be used. Trip and field blanks will be collected during sampling of the B16 and B17 areas. Expedited turnaround time (TAT) will not be requested for the samples since the pits will be lined with poly sheeting and backfilled

immediately.

4.3 Documentation

All field activities will be documented both in logbooks and with photographs according to MMG's standard operating procedures and using MMG's standard forms (i.e. Sample Logs, Photolog, etc.). Bound logbooks with numbered pages and indelible ink will be used to record site activities. Mistakes or incorrect entries will be crossed out with a line and initialed. Copies of all field documentation will be included in the final report.

4.4 Sample Packaging and Custody

4.4.1 Sampling Handling

Sample containers used for soil samples will be the appropriate jar or bottle for each parameter as provided by the laboratory.

All samples will be labeled with the site name, sample name, sample matrix, analysis required, sampler, and the date and time of sampling.

Sample containers will be handled with gloves. Upon completion of sample collection, all sample containers will be wiped down and properly labeled with indelible ink. The lids will be tightened to prevent spilling or cross-contamination, and all containers will be wrapped in bubble wrap and placed on ice in coolers. The sample coolers will be shipped via courier or Federal Express to Accutest Laboratories in Scott, Louisiana.

The labeled and wrapped sample containers will be placed on ice in a cooler. A temperature blank will be added to the cooler to confirm that samples remain at 4 degrees Celsius until arrival at the laboratory. The completed Chain-of-Custody will be placed in a plastic bag and taped inside of the cooler lid. The cooler will be sealed with duct or shipping tape. A custody seal will be placed over the crack between the cooler lid and side to ensure the samples are not tampered with during transport to the laboratory. All labels and seals will be covered with clear tape.

4.4.2 Sample Custody

The purpose of the chain-of-custody record (COCR) is to document the identity of the sample and to document that samples were handled by authorized individuals as a means to maintain sample integrity. The COCR form contains the following information:

- Project name and location
- Sample identification/name
- Date and time of sampling
- Type of sample (composite vs. grab)
- Sample matrix
- Sample container type, size, and number
- Requested analyses
- Sample Collector

- Remarks sections
- Signatures of individuals relinquishing and receiving samples

COCRs will be maintained for all samples. The COCR documentation will be completed at the end of each day for all samples collected that day. The information included on the COCR will be checked against the sample containers and the field logbooks to verify that all information is consistent.

Upon arrival of the sample cooler at the laboratory, the laboratory custodian will break the custody seal and inspect the samples. The individual will compare the COCR with the sample containers. The custodian will then sign the COCR and note any irregularities. In addition, the custodian will complete a Sample Receipt Checklist. The checklist and completed COCRs will be included in the final analytical report from the laboratory.

4.4.3 Sample Designation

A sample numbering system will be used to identify each sample. This numbering system will identify soil samples, splits, trip and field blanks, and temperature blanks. Each sample number will consist of the following format:

X-6152-CNO-text1-text2-suffix

Where

X

is the sample matrix: S = soil, W = water.

6152-CNO

is the job number and site identifier.

text1

is the excavation location: B1 = borehole 1 excavation; B6 = borehole B6 excavation, etc.

text2

is the sample location: SW1 = sidewall 1; SW2 = sidewall 2; BTM = bottom of pit, etc.

suffix

is only added to the sample name if it is a split. It will consist of letter a (lowercase): S-6152-CNO-B16-SW1a = split of sample from B16 excavation, sidewall 1.

Trip and field blanks will be labeled as follows:

W-6152-CNO-FB-date or W-6152-CNO-TB-date.

4.5 Decontamination

Equipment decontamination will not be necessary since disposable sampling equipment will be used. Personnel decontamination will involve washing exposed areas with soap and water and/or moistened towels. Disposable PPE will be removed and decontamination will take place prior to any employee leaving the work area and/or eating, drinking, smoking, etc.

5.0 Quality Assurance/Quality Control Plan

The quality requirements for implementation of the proposed remedial design are discussed in the following sections.

5.1 Data Quality Requirements

The sample data collected will be used to determine whether the cleanup can be considered complete (and protective of human health). Therefore the data quality will meet the requirements indicated under the LDEQ RECAP program. In addition, the data will meet the standard quality assurance/quality control (QA/QC) requirements (or measurement quality objectives – MQOs); these are precision, accuracy, representativeness, completeness, comparability, and sensitivity (PARCCS).

5.2 Inspection of Consumables

All supplies and consumables will be inspected by the Project Manager or other designated person upon receipt. Supplies such as sample containers will be inspected to assure they meet the requirements based on the analytical method. Other consumables (backfill material, etc.) will be inspected for contamination or other unacceptable condition prior to acceptance. If supplies do not meet these criteria, they will be returned and replacements will be requested.

5.3 Corrective Action and Audits

All performance audits and corrective action procedures will be conducted according to MMG's standard operating procedures and are outlined below.

The corrective action system used during this project is designed to quickly identify problems, and solve them efficiently. The Project Manager is responsible for the direction of this system and will receive full support from management for its implementation. The essential steps are:

- a. Identify and define the problem
- b. Assign responsibility for investigating the problem
- c. Determine a corrective action to eliminate the problem
- d. Assign and accept responsibility for implementing the corrective action
- e. Implement the corrective action
- f. Verify that the corrective action has eliminated the problem
- g. Document the problem identified, the corrective action taken, and its effectiveness in eliminating the problem

The contracted laboratory also has an internal QA corrective action program as part of their Quality Management Plans (QMPs). This program includes verification that QC data are not outside acceptable windows for precision and accuracy, blanks or control samples do not contain contaminants above detection limits, and undesirable trends detected in spike recoveries or RPDs between duplicates are corrected. The program also ensures that there are no unusual changes in detection limits, that holding times have not been exceeded, and that deficiencies detected by the laboratory QA department during internal or external audits are corrected.

System audits will be performed during the course of field activities. Evaluations will be made of ongoing fieldwork, as well as any other activity affecting quality. The primary purpose of the system audit is to verify and document that field activities are being performed efficiently and in conformance with approved standards and procedures

(including MMG SOPs), Federal and state regulatory requirements, sound engineering and environmental practices, and contract requirements.

QA surveillance will be performed as necessary, using performance-based concepts for monitoring and/or observing activities to verify conformance to specified program requirements. Surveillance is considered to be a snapshot of compliance during a given time and generally focuses on one specific area of review rather than entire program effectiveness. Surveillance will be conducted at the discretion of the Project Manager or designee and may be initiated when an overview less formal than an audit is desirable.

6.0 Health and Safety Considerations

There are health and safety considerations associated with implementing the remedial design. In addressing these issues and determining the appropriate mitigation, MMG has considered the requirements of the Occupational Safety and Health Administration (OSHA) Act 29 CFR 1910.120. **In addition, the City of New Orleans will require all subcontractors to prepare a Site-Specific Safety and Health Plan to be reviewed by MMG and provided to LDEQ upon request.**

The health and safety hazards and their mitigation are addressed in this section. The hazards include potential exposure to contaminants and typical physical hazards associated with construction activities.

6.1 Emergency Contacts

Louisiana State Police	(225) 754-8500
City of New Orleans Police Department	(504) 658-6030
City of New Orleans Fire Department	(504) 658-4700
Department of Environmental Quality	(504) 736-7763
Department of Agriculture & Forestry	(225) 922-1269
Department of Wildlife & Fisheries	(225) 765-2360

6.2 Hazard Analysis

The chemical and physical hazards associated with the remediation are summarized in the following tables.

Chemical Hazards Table

Chemical	Exposure Symptoms	Carcinogen	Exposure Limit (PEL, REL)	Exposure Routes	Tasks Leading to Exposure*
Arsenic	Dermatitis, GI disturbance, respiratory irritation	EPA Group A Known Human Carcinogen	PEL = 0.010 mg/m ³	Ingestion, Absorption	Excavation, sampling
Lead	Insomnia, abdominal pain, constipation, tremors, wrist paralysis, eye irritation, facial pallor	EPA Group A Known Human Carcinogen	PEL = 0.050 mg/m ³	Ingestion, Absorption	Excavation, sampling
PAHs	Respiratory tract irritation, skin irritation, and difficulty breathing	**	PEL = 0.2 mg/m ³	Ingestion, Absorption, Inhalation	Excavation, sampling

**Some components of polycyclic hydrocarbons (such as benzo(a)pyrene) are known or probable human carcinogens; most of the remaining components are non-carcinogenic.

Physical Hazards Table

Physical Hazard	Tasks Leading to Hazard	Mitigation
Slips/trips/falls	All tasks (excavation, sampling, backfill)	Caution in walking and moving equipment, awareness training
Cuts/contusions, pinched fingers/toes, punctures	All tasks (excavation, sampling, backfill)	Awareness training, use of PPE (gloves, steel-toe boots, long sleeves, etc.)
Overexertion	All tasks (excavation, sampling, backfill)	Awareness training, frequent breaks, electrolytes
Struck by/struck against (maneuvering equipment, vehicles)	All tasks (excavation, sampling, backfill)	Awareness (vehicle operation) training, caution when operating, back-up alarms
Thermal stress	All tasks (excavation, sampling, backfill)	Appropriate clothing, frequent breaks, electrolytes, awareness training
Severe weather	All tasks (excavation, sampling, backfill)	Suspend work until safe conditions
Biological hazards	All tasks (excavation, sampling, backfill)	Inspect site prior to work, use of PPE, awareness training

6.3 Personal Protective Equipment

Based on an evaluation of the chemical and physical hazards at the site, modified Level D has been determined to be the appropriate level of personal protective equipment (PPE). The required equipment for modified Level D PPE is indicated below.

Modified Level D:

- Hard hat
- Steel-toe boots
- Long sleeves and pants
- Safety glasses
- Reflective vests
- Leather or cotton dot gloves
- Latex or Nitrile gloves when sampling
- Ear plugs around heavy equipment

6.4 Emergency and Contingency Plans

All field activities will be conducted in accordance with MMG's standard emergency and contingency plans, including medical and fire emergencies, equipment failure, and other emergencies that may occur over the course of the investigation.

6.5 Medical Emergency

In the event of a medical emergency, the nearest hospital is the Medical Center of Louisiana at New Orleans, and is located at 2021 Perdido Street. The route to the hospital is to go north on Alvar St. and take Interstate I-10 west toward downtown. Take Exit 235B to Tulane Avenue heading east. Turn right on S Johnson St., and proceed to Perdido St. The hospital will be on the left.

Medical Center of Louisiana at New Orleans
2021 Perdido Street
New Orleans, Louisiana
(504) 903-3000

7.0 Final Report

MMG will develop a Final Corrective Action Report to document the remedial action activities. The report will include the following:

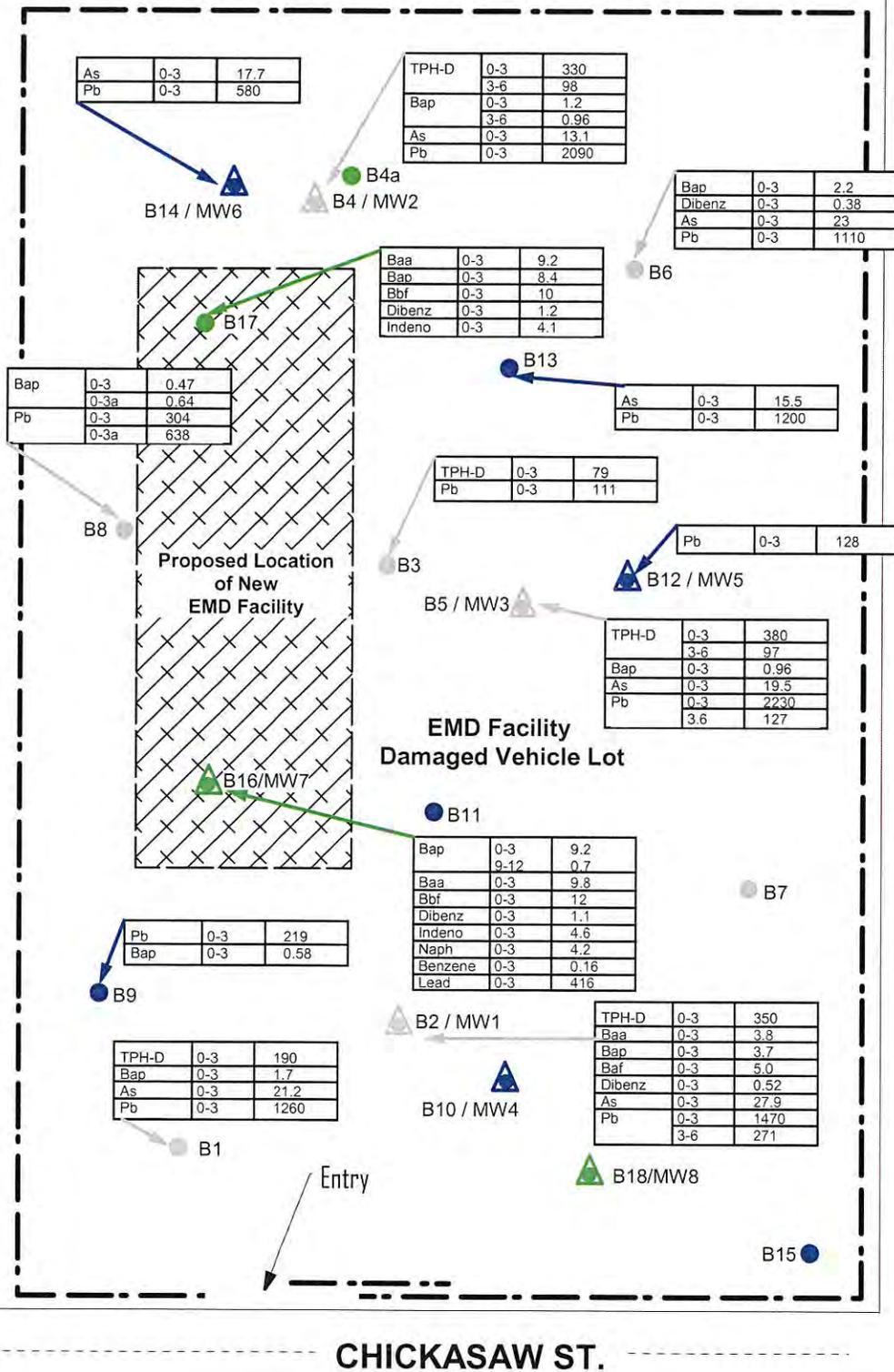
- Brief Narrative of Field Activities
- Laboratory Results and Chain of Custody
- Waste Manifest Documents
- Copy of All Applicable Permits
- Site Map (showing the location of all excavated areas and confirmatory sampling points)
- Photographs (of critical site activities)
- Formal request to LDEQ for No Further Action at This Time (NFA-ATT) with applicable Conveyance Notice for industrial use.

Figures

Figure 1: Site Location Map



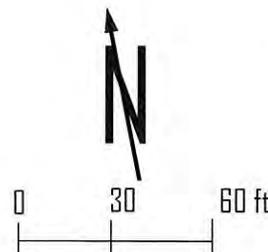
Figure 2:
Soil Concentrations
Exceeding RECAP SS



LEGEND

- RECAP Investigation Dec. 2009 Monitoring Well Location
- RECAP Investigation July 2009 Monitoring Well Location
- ESA Investigation Monitoring Well Location
- RECAP Investigation Dec. 2009 Borehole Location
- RECAP Investigation July 2009 Borehole Location
- ESA Investigation Borehole Location
- Chain Link Fence

Constituent	Interval	mg/kg
TPH-D	0-3	
Bap	0-3	
As	0-3	< 1.5
Pb	0-3	1200



Location: EMD Facility
3900 Alvar St.
N. O. LA, 70117

Project: 6152-CNO

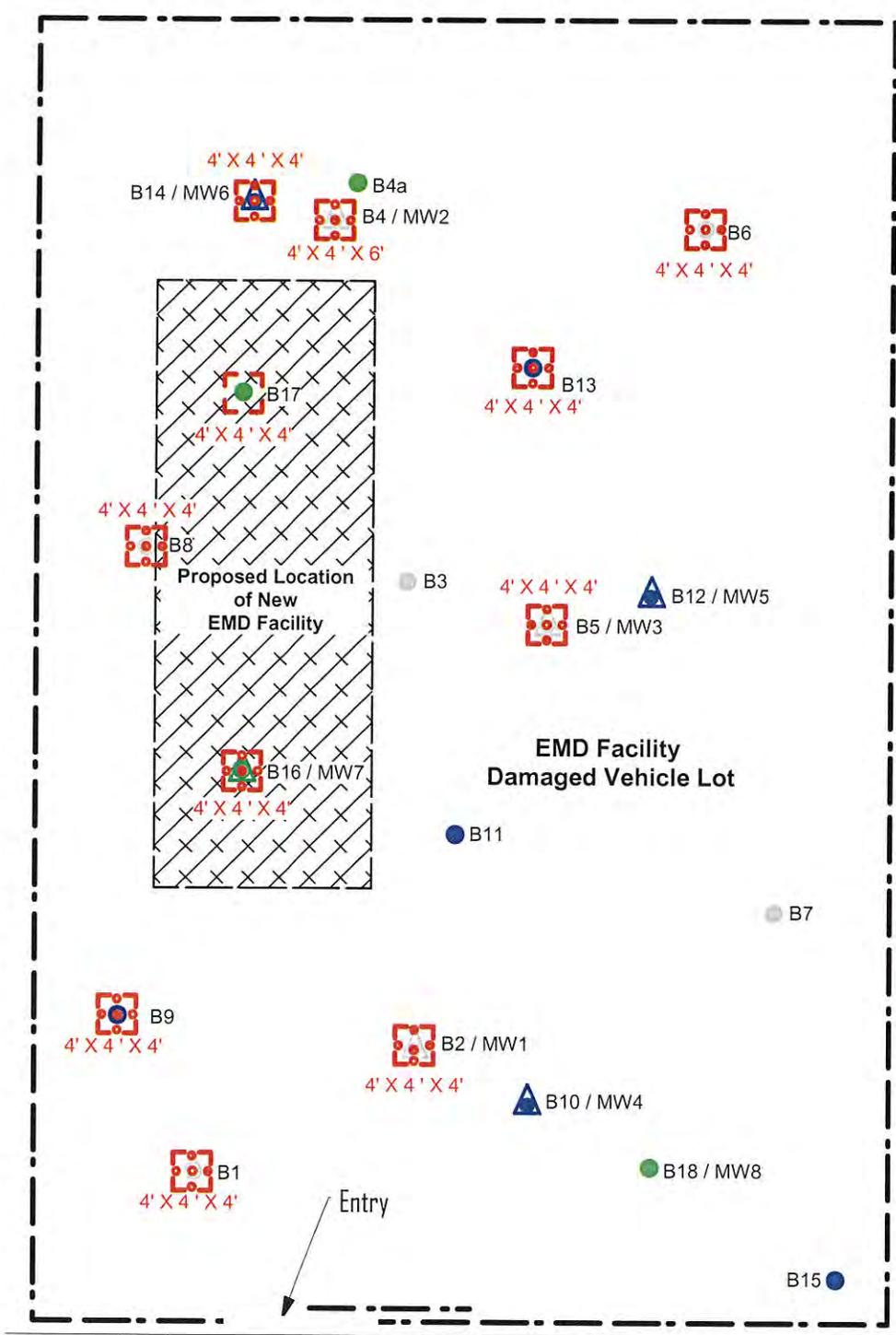
Produced By: Materials Management Group Inc.
3520 General DeGaulle Dr #3010, New Orleans LA, 70114

Client: City of New Orleans

Date: 06/20/2012

Drawn By: Ashley Martinovich

Figure 3:
Proposed Remedial Design

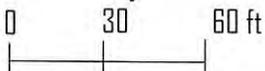


LEGEND	
	MW7 RECAP Investigation Dec. 2009 Monitoring Well Location
	MW4 RECAP Investigation July 2009 Monitoring Well Location
	MW1 ESA Investigation Monitoring Well Location
	B16 RECAP Investigation Dec 2009 Borehole Location
	B12 RECAP Investigation July 2009 Borehole Location
	B6 ESA Investigation Borehole Location
	Chain Link Fence
	Areas Requiring Further Action <i>(Not to scale)</i>
	Confirmatory Sample

ALVAR ST.

CHICKASAW ST.

Current EMD Facility @ 3800 Alvar St.



Location:
EMD Facility
3900 Alvar St.
N. O. LA, 70117

Project:
6152-CNO

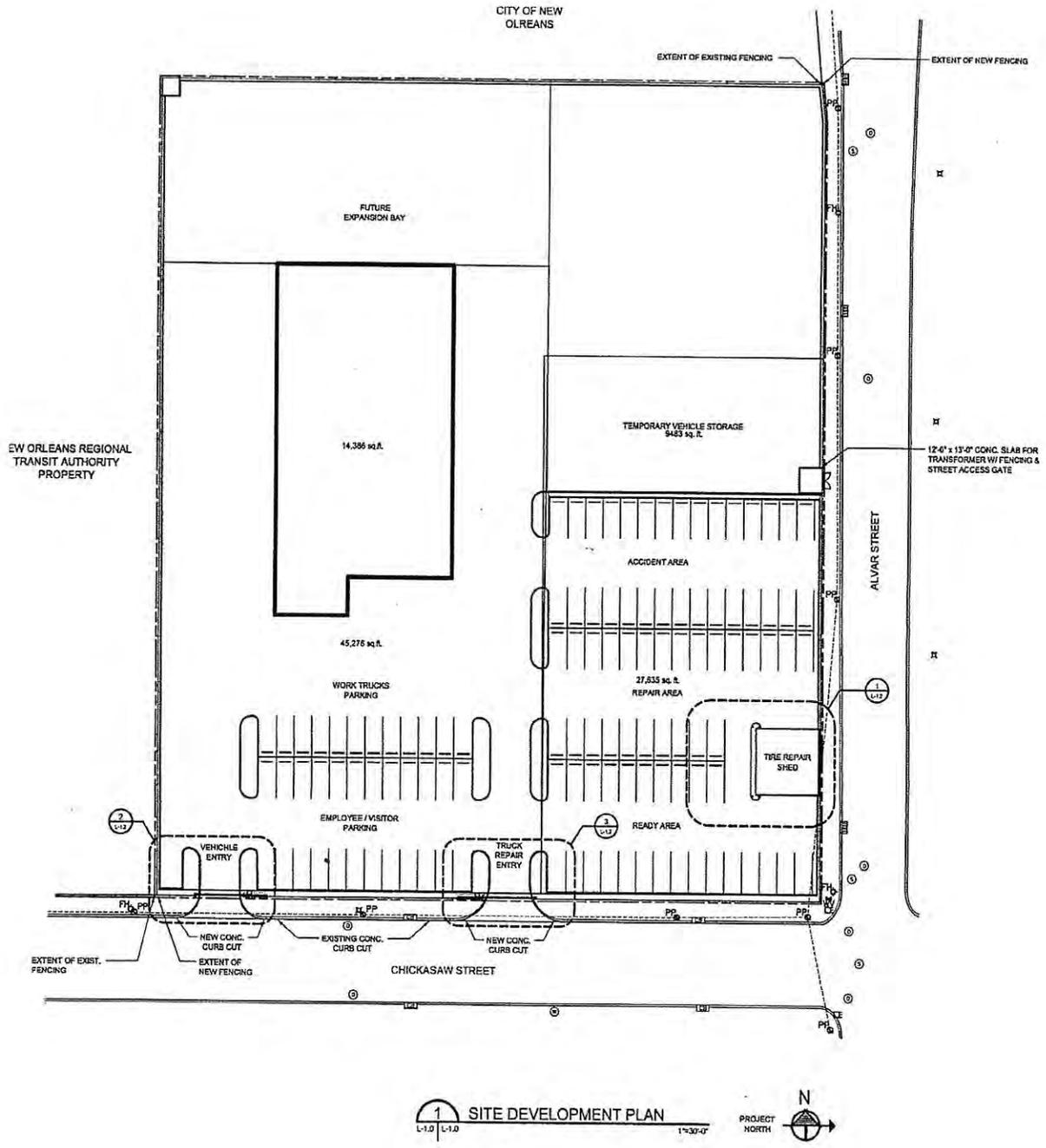
Produced By:
Materials Management Group Inc.
3520 General DeGaulle Dr #3010, New Orleans LA, 70114

Client:
City of New Orleans

Date:
06/20/2012

Drawn By:
Ashley Martinovich

Figure 4: Proposed Site Redevelopment



Appendix A: RECAP Form 11

3900 ALVAR ST, NEW ORLEANS, LA A1# 165655
 RECAP FORM 11
 MANAGEMENT OPTION 1 SUBMITTAL FOR SOIL 0-15 FT BGS

SOIL 0-15 ft bgs - Identification of the Limiting MO-IRS:

COC	X Soil _i	Additivity Divisor	Final X Soil _i o Soil _{ini}	Soil _{GW}				Final Soil _{GW}	Soil _{es}	Soil _{sat}	Limiting MO-1 RS
	o Soil _{ini}			o Soil _{GW1}	o Soil _{GW2}	X Soil _{GW3DW}	o Soil _{GW3NDW}				
Arsenic	12	None	12	100	100	100	100	NA	NA	12	
Lead	1400	NA	1400	100	100	100	100	NA	NA	100	
Benz(a)anthracene	2.9	NA	2.9	0.016	173	2.77	2.77	NA	NA	2.77	
Benzo(a)pyrene	0.33	NA	0.33	23	173	3979	3979	NA	NA	0.33	
Benzo(b)fluoranthene	2.9	NA	2.9	13	NA	13	13	NA	NA	2.9	
Dibenz(a,h)anthracene	0.33	NA	0.33	2	NA	2	2	NA	NA	0.33	
Indeno(1,2,3-cd)pyrene	2.9	NA	2.9	9.2	NA	9.2	9.2	NA	NA	2.9	
Naphthalene	430	None	430	25	173	4325	4325	220	NA	220	
Benzene	2.3*	None	2.3*	0.011	173	1.9	1.9	2.5	900	1.9	

*VOC adjusted for site size greater than 0.5-acre

SOIL 0-15 ft bgs - Identification of the AOIC:

COC	Maximum Concentration		95%UCL-AM Concentration		AOI Concentration	
	17.7	22.6 (0-3 ft interval only)	22.6 (0-3 ft interval only)	17.7	1200	17.7
Arsenic	17.7	22.6 (0-3 ft interval only)	22.6 (0-3 ft interval only)	17.7	1200	17.7
Lead	1200	NA	NA	1200	1200	1200
Benz(a)anthracene	9.8	2.156	2.156	2.156	2.156	2.156
Benzo(a)pyrene	9.4	2.213	2.213	2.213	2.213	2.213
Benzo(b)fluoranthene	12	3.338	3.338	3.338	3.338	3.338
Dibenz(a,h)anthracene	1.2	0.339	0.339	0.339	0.339	0.339
Indeno(1,2,3-cd)pyrene	4.6	1.537	1.537	1.537	1.537	1.537
Naphthalene	4.2	0.271	0.271	0.271	0.271	0.271
Benzene	0.16	0.021	0.021	0.021	0.021	0.021

3900 ALVAR ST, NEW ORLEANS, LA AI# 165655
 RECAP FORM 11
 MANAGEMENT OPTION 1 SUBMITTAL FOR SOIL 0-15 FT BGS

MO-1 SOIL 0-15 ft bgs RECAP ASSESSMENT:

COC	Limiting MO-1 RS	AOI Concentration	AOIC Exceeds MO-1 LRS?
Arsenic	12	17.7	Yes
Lead	100	1200	Yes*
Benz(a)anthracene	2.77	2.156	No
Benzo(a)pyrene	0.33	2.213	Yes
Benzo(b)fluoranthene	2.9	3.338	Yes
Dibenz(a,h)anthracene	0.33	0.339	Yes (almost equal)
Indeno(1,2,3-cd)pyrene	2.9	1.537	No
Naphthalene	220	0.271	No
Benzene	1.9	0.021	No

*See SPLP evaluation in RECAP Submittal for further evaluation of lead contamination.

RECOMMENDATION FOR APPROVAL

1

RECOMMENDATION-TASK ORDER

Materials Management Group, Inc. (MMG)

For Environmental Remediation Activities at EMD Central Maintenance – Alvar Street

PUBLIC BENEFIT

Project Description: This recommendation is to provide complete Management of Remedial Activities at a former Vehicle Storage Lot for a new, centrally located vehicle maintenance facility.

- Need for this Amendment: Provide a complete package of services for Corrective Action Program preparation, provide bid and specification documents, on sight Environmental Management, perform Confirmatory Soil Sampling and complete the CAP Report and NFA (No Further Action) request.

Time-Line for major tasks:

- CAP Preparation is complete.
Construction Documents Phase is complete
On site Environmental Management will commence upon release of NTP for Environmental Contractor
Bid and Award Date for actual Environmental work: Date Mayor Landrieu signs Construction Contract
Substantial Completion Date: Determined by MMG after NFA is accepted by LDEQ

- Source of Funding for this Amendment: FEMA Funds and Insurance

- Value of this New Contract is: \$48,060.06

Total Project Investment to Date:

- Value of Management Contract for this work to Date: \$ 0.00
Construction Contract Value to Date: \$ 0.00
Value of Project Management to Date: TBD
Value of other Professional Services to Date: \$ 177,814.35 (Linfield Hunter& Junius)
Other Sunk Costs to Date: \$ 31,247.50 (MMG for previous phase of work)
Total Investment to Date: \$ 209,061.85

RECORDATION

- Is this amendment more than 10% of the original contract and more than \$10,000? [] Yes [x] No
Does this amendment put the total % of amendments above 20% of the original contract and is it more than \$10,000? [] Yes [x] No
If the answer is yes to either one of these questions recordation is required by state law within 30 days. If the original contract and/or previous amendments have not yet been recorded they must be recorded at this time.

VENDOR SELECTION AND DBE INFORMATION

- Type of Procurement Used: RFP
Local Vendor: [x] Yes [] No
DBE: [x] Yes [] No. If No, %

ACTION CRITICAL

- Objective consideration of alternatives: Design of Environmental Remediation program, its implementation and management are required for Louisiana DEQ approval. No alternative considered.
I recommend approval for the above project (If not recommending for approval, please indicate a reason below, and return this to the previous signatory)

James E. McCormick, Jr., Capital Projects Project Manager Supervisor
Requested Response Date: / / Date:

Vincent A. Smith, Director, Capital Projects Administration
Requested Response Date: / / Date:

Cedric S. Grant, Deputy Mayor Facilities, Infrastructure and Community Development
Requested Response Date: / / Date:



Materials Management Group, Inc.

October 12, 2012

Mr. Jim Lynch
Senior Architect
Capital Projects Administration
Facilities, Infrastructure and Community Development
City Hall
1300 Perdido St., Suite 6E15
New Orleans, LA 70122

RE: Revised Proposal for Management of Remedial Activities,
Former Vehicle Storage Lot, Proposed Equipment Maintenance
& Fuel Facility
LDEQ AI#: 165655
MMG Project #: 6152-CNO

Dear Mr. Lynch:

Materials Management Group, Inc. (MMG) is pleased to submit the following revised proposal for environmental management activities for implementation of the remedial activities at the former vehicle storage lot/proposed equipment maintenance and fuel facility located at 3900 Alvar Street in New Orleans. The site is the proposed location for construction of a new City of New Orleans Equipment Maintenance & Fuel Facility. Based on previous site investigations, the Louisiana Department of Environmental Quality (LDEQ) has requested preparation and implementation of a Corrective Action Plan (CAP) to address site contamination prior to redevelopment.

The environmental management activities will include the following:

Phase 1: Preparation of the CAP and submittal to LDEQ for approval. The CAP will include the scope of remediation based on the recommendations provided in the RECAP Report as approved by LDEQ in March 2011. The CAP will include consideration of proposed site redevelopment plans.

Phase 2: Preparation of the specifications/bid documents for CAP implementation, including requirements for excavation, disposal, and backfill in the areas designated in the approved CAP. Preparation of the specifications includes all pre-bid site walks and meetings.

Phase 3: Conducting on-site management/oversight of the excavation, waste load out, and backfilling activities. MMG will also manage all waste documents (including manifests and transportation tickets) during implementation of the CAP.



Phase 4: Collection of the confirmatory soil samples for all excavation areas in accordance with LDEQ RECAP requirements. MMG's geologist will collect the designated number of confirmatory samples plus all appropriate quality control samples to meet RECAP requirements. The samples will be sent to a LELAP-accredited laboratory for analysis. Confirmatory samples will be analyzed for the contaminants of concern as described in the CAP. Expedited turnaround time for sample analysis (the fastest possible is 3-days) will be requested.

Phase 5: Preparation of the CAP report documenting all activities, sample results, and waste documentation. The CAP report will also include the formal request to LDEQ for a No Further Action at This Time (NFA-ATT) determination and associated site closure.

The cost for environmental management of the remedial activities is summarized in the table below. Breakdowns of these tasks per MMG contract are included at the next pages.

Task	Cost
Phase 1: CAP Preparation	\$10,780.28
Phase 2: Specs/Bid Documents	\$4,986.64
Phase 3: Onsite Environmental Management	\$5,028.32
Phase 4: Confirmatory Soil Sampling	\$16,783.34
Phase 5: CAP Report & NFA Request	\$10,481.48
Total	\$48,060.06

If you should have any questions, please feel free to contact me at (504) 368-0568.

Sincerely,



Dr. C. Paul Lo, Sc.D.
President/Senior Environmental Scientist

PROJECT COST BREAKDOWN

I. CAP Preparation

1. Personnel Costs

Contract Item #	Description	Quantity	Contract Rate	Subtotal	
1	Principal	28 hrs	\$132.34	\$3,705.52	
5	Senior Risk Assessor	32 hrs	\$107.91	\$3,453.12	
13	Geologist	16 hrs	\$72.28	\$1,156.48	
18	Environmental Scientist	24 hrs	\$72.28	\$1,734.72	
53	Word Processor	6 hrs	\$41.74	\$250.44	
				Total Personnel Costs	\$10,300.28

2. Materials and Equipment Costs

Contract Item #	Description	Quantity	Contract Rate	Subtotal	
197	B&W Copies	1000	\$0.15	\$150.00	
200	Color Copies	15	\$2.00	\$30.00	
204	Binders	5	\$12.00	\$60.00	
260	CADD Computer	6 hrs	\$40.00	\$240.00	
				Total Equipment Costs	\$480.00

TOTAL \$10,780.28

II. Specification/Bid Documentation Preparation

1. Personnel Costs

Contract Item #	Description	Quantity	Contract Rate	Subtotal	
1	Principal	24 hrs	\$132.34	\$3,176.16	
5	Senior Risk Assessor	8 hrs	\$107.91	\$863.28	
18	Environmental Scientist	8 hrs	\$72.28	\$578.24	
53	Word Processor	4 hrs	\$41.74	\$166.96	
				Total Personnel Costs	\$4,784.64

2. Equipment and Materials Costs

Contract Item #	Description	Quantity	Contract Rate	Subtotal	
119	Truck	2 days	\$40.00	\$80.00	
184	Communication	2 days	\$10.00	\$20.00	
197	B&W Copies	200	\$0.15	\$30.00	
200	Color Copies	30	\$2.00	\$60.00	
203	Binders	2	\$6.00	\$12.00	
				Total Equipment Costs	\$202.00

TOTAL \$4,986.64

III. On-site Environmental Management

1. Personnel Costs

Contract Item #	Description	Quantity	Contract Rate	Subtotal	
1	Principal	8 hrs	\$132.34	\$1,058.72	
5	Senior Risk Assessor	8 hrs	\$107.91	\$863.28	
18	Environmental Scientist	24 hrs	\$72.28	\$1,734.72	
36	Environmental Technician	24 hrs	\$50.90	\$1,221.60	
Total Personnel Costs				\$4,878.32	

2. Equipment Costs

Contract Item #	Description	Quantity	Contract Rate	Subtotal	
119	Truck	3 days	\$40.00	\$120.00	
184	Communication	3 days	\$10.00	\$30.00	
Total Equipment Costs				\$150.00	

TOTAL \$5,028.32

IV. Confirmatory Soil Sampling

1. Personnel Costs

Contract Item #	Description	Quantity	Contract Rate	Subtotal	
1	Principal	4 hrs	\$132.34	\$529.36	
5	Senior Risk Assessor	10 hrs	\$107.91	\$1,079.10	
18	Environmental Scientist	16 hrs	\$72.28	\$1,156.48	
36	Environmental Technician	16 hrs	\$50.90	\$814.60	
Total Personnel Costs				\$3,579.34	

2. Analysis Costs

Contract Item #	Description	Quantity	Contract Rate	Subtotal	
73	Lead in soil	58	\$12.00	\$696.00	
73	Arsenic in soil	58	\$12.00	\$696.00	
96	BTEX	14	\$92.00	\$1,288.00	
97	PAH	58	\$165.00	\$9,570.00	
Total Analysis Costs				\$12,250.00	

3. Equipment and Material Costs

Contract Item #	Description	Quantity	Contract Rate	Subtotal	
119	Truck	2 days	\$40.00	\$80.00	
128	Gear Trailer	2 days	\$40.00	\$80.00	
166	Small Tools	2 days	\$12.00	\$24.00	
184	Communication	2 days	\$10.00	\$20.00	
185	LEL/O2	2 days	\$40.00	\$80.00	
186	PID	2 days	\$90.00	\$180.00	
259	Health and Safety Supplies	2 days	\$120.00	\$240.00	
263	GPS/DGPS	2 days	\$125.00	\$250.00	
Total Equipment Costs				\$954.00	

TOTAL \$16,783.34

V. CAP Report and NFA Request

1. Personnel Costs

Contract Item #	Description	Quantity	Contract Rate	Subtotal	
1	Principal	8 hrs	\$132.34	\$1,058.72	
5	Senior Risk Assessor	24 hrs	\$107.91	\$2,589.84	
13	Geologist	10 hrs	\$72.28	\$722.80	
18	Environmental Scientist	40 hrs	\$72.28	\$2,891.20	
53	Word Processor	8 hrs	\$41.74	\$333.92	
Total Personnel Costs					\$7,596.48

2. Equipment and Material Costs

Contract Item #	Description	Quantity	Contract Rate	Subtotal	
119	Truck	1 day	\$40.00	\$40.00	
184	Communication	1 day	\$10.00	\$10.00	
197	B&W Copies	2000	\$0.15	\$300.00	
200	Color Copies	60	\$2.00	\$120.00	
205	Binders	8	\$25.00	\$200.00	
260	CADD Computer	10 hrs	\$40.00	\$400.00	
Total Equipment Costs					\$1,070.00

3. Cost Plus Item Costs

Contract Item #	Description	Quantity	Rate	Subtotal	Markup (10%)	Total
264	Clerk of Court Fee	1	\$150.00	\$150.00	\$15.00	\$165.00
264	LDEQ Fee	1	\$1,500.00	\$1,500.00	\$150.00	\$1,650.00
Total Cost Plus Item Costs						\$1,815.00

TOTAL \$10,481.48

Appendix B

Agency Correspondence

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



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

MAR 22 2013

REPLY TO
ATTENTION OF

Operations Division
Operations Manager,
Completed Works

Federal Emergency Management Agency
Environmental Section
Attn: Joel Caldwell
1 Seine Court
New Orleans, LA 70114

Dear Mr. Caldwell:

This is in response to the Solicitation of Views request dated March 1, 2013, concerning the construction of the EMD Central Maintenance and Fuel Facility, at New Orleans, Louisiana, in Orleans 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 approved jurisdictional determination is valid for a period of five 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 for questions concerning wetlands determinations or need for on-site evaluations. Questions concerning regulatory permit requirements may be addressed to Mr. Michael V. Farabee by telephone at (504) 862-2292 or by e-mail at Michael.V.Farabee@usace.army.mil.

Future correspondence concerning this matter should reference our account number MVN-2013-00581-SQ. This will allow us to more easily locate records of previous correspondence, and thus provide a quicker response.

Sincerely,



for Karen L. Clement
Solicitation of Views Manager

U.S. Department of Homeland Security
Federal Emergency Management Agency
FEMA-DR 1603 LA
1 Seine Court
New Orleans, LA 70114

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(a)(2) of the Act.

Deborah A. Fuller March 11 2013
Acting Supervisor
Louisiana Field Office
U.S. Fish and Wildlife Service
Date

March 1, 2013

MEMORANDUM TO: See distribution

SUBJECT: EMD Central Maintenance and Fuel Facility

To Whom It May Concern:

The Department of Homeland Security's Federal Emergency Management Agency (FEMA) is mandated by the U.S. Congress to administer Federal disaster assistance pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), PL 93-288, as amended. The Stafford Act authorizes FEMA's Public Assistance Program to provide grant assistance to eligible applicants for repair, replacement or restoration of eligible disaster damaged facilities, and may include mitigation measures to lessen future damages.

The following scope of work and attached aerial photograph correspond to a proposed project for which FEMA funding has been requested. The City of New Orleans proposes construction of a 16,900 square foot building on a 3 acre site located at 3900 Alvar Street, New Orleans, LA 70126. The facility will be utilized for maintenance of the New Orleans Police and Fire Departments' vehicles and equipment. These functions were formerly provided at a 3800 Alvar Street facility which was severely damaged by Hurricane Katrina.

A RECAP assessment in December of 2009 discovered elevated levels of PAH's on the proposed project site. Site remediation includes removal of 3 feet of soil under the building footprint, and backfill with sand.

The pre-existing facility at 3800 Alvar Street will provide warehouse space for vehicles and equipment, and will continue its function as a fueling facility for city vehicles. Two Underground Storage Tanks (UST's) are located at the pre-existing site. These tanks are currently in temporary closure, and are registered with the Louisiana Department of Environmental Quality (LDEQ) through June 30, 2013.

To ensure compliance with the National Environmental Policy Act (NEPA), Executive Orders, and other applicable Federal regulations, we will be preparing an Environmental Assessment (EA). To assist us in preparation of the EA, we request that your office review this project information for a determination as to the requirements of any formal consultations, regulatory permits, determinations, or authorizations.

Please respond within 30 calendar days of the date of this scoping notification.

Comments may be faxed to (504) 762-2323, emailed to joel.caldwell@fema.dhs.gov, or mailed to the attention of Joel Caldwell, Environmental Section, at the address above.

For questions regarding this matter, please contact Joel Caldwell at (504) 762-2254.

Distribution: Louisiana Department of Environmental Quality, U.S. Environmental Protection Agency, National Oceanic and Atmospheric Administration – National Marine Fisheries Service, U.S. Army Corps of Engineers, Louisiana Department of Wildlife and Fisheries, Louisiana Department of Natural Resources, and U.S. Fish and Wildlife Service

Tiffany Spann-Winnfield
Deputy Environmental Liaison Officer



BOBBY JINDAL
GOVERNOR

State of Louisiana
DEPARTMENT OF WILDLIFE AND FISHERIES
OFFICE OF WILDLIFE

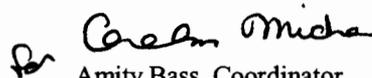
ROBERT J. BARHAM
SECRETARY
JIMMY L. ANTHONY
ASSISTANT SECRETARY

Date March 8, 2013
Name Joel Caldwell
Company FEMA
Street Address 1 Seine Court
City, State, Zip New Orleans, LA 70114
Project EDM Central Maintenance & Fuel Facility
Project ID
Invoice Number 13030811

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



BOBBY JINDAL
GOVERNOR

State of Louisiana
DEPARTMENT OF WILDLIFE AND FISHERIES
OFFICE OF WILDLIFE

ROBERT J. BARHAM
SECRETARY
JIMMY L. ANTHONY
ASSISTANT SECRETARY

INVOICE

RETURN THIS COPY OF INVOICE WITH PAYMENT

Date March 8, 2013
Invoice Number 13030811
Project EDM Central Maintenance & Fuel Facility

Name Joel Caldwell
Company FEMA
Street Address 1 Seine Court
City, State, Zip New Orleans, LA 70114
Number of Quads Reviewed 1
Total Due \$0.00

Payment should be made to "Louisiana Department of Wildlife & Fisheries" within 30 days of the date of this invoice. Please include the invoice number on your check and return a copy of this invoice with your remittance to the following address:

Louisiana Department of Wildlife & Fisheries
Attn: Jennifer Riddle
P.O. Box 80399
Baton Rouge, LA 70898-0399

Should you have any questions regarding this invoice, for review of the Louisiana Natural Heritage database for information on known sensitive elements at a charge of \$30.00 per quad reviewed, please contact LNHP at (225) 765-2357.



BOBBY JINDAL
GOVERNOR

State of Louisiana
DEPARTMENT OF WILDLIFE AND FISHERIES
OFFICE OF WILDLIFE

ROBERT J. BARHAM
SECRETARY
JIMMY L. ANTHONY
ASSISTANT SECRETARY

INVOICE

RETAIN THIS COPY FOR YOUR RECORDS

Date March 8, 2013
Invoice Number 13030811
Project EDM Central Maintenance & Fuel Facility

Name Joel Caldwell
Company FEMA
Street Address 1 Seine Court
City, State, Zip New Orleans, LA 70114
Number of Quads Reviewed 1
Total Due \$0.00

Payment should be made to "Louisiana Department of Wildlife & Fisheries" within 30 days of the date of this invoice. Please include the invoice number on your check and return a copy of this invoice with your remittance to the following address:

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Baton Rouge, LA 70898-0399

Should you have any questions regarding this invoice, for review of the Louisiana Natural Heritage database for information on known sensitive elements at a charge of \$30.00 per quad reviewed, please contact LNHP at (225) 765-2357.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

March 25, 2013

Joel Caldwell
Environmental Section
U.S. Department of Homeland Security
Federal Emergency Management Agency
FEMA-DR 1603 LA
1 Seine Court
New Orleans, Louisiana 70114

Dear Mr. Caldwell:

The U.S. Environmental Protection Agency (EPA) has completed your request of a review of the scoping notification and solicitation of views concerning the New Orleans Alvar Street facility. The scope of the work for the project includes the construction of a 16,900 square foot building on a 3 acre site located at 3900 Alvar Street. The facility will be utilized for maintenance of the New Orleans Police and Fire Departments' vehicles and equipment. 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 on the proposed site. 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 Gutierrez.raul@epa.gov or 214-665-6697.

Sincerely yours,

A handwritten signature in black ink that reads "Raul Gutierrez".

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



FEMA

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

February 7, 2013

Carlos Bullock
Tribal Council Chairman
Alabama-Coushatta Tribe of Texas
571 State Park Rd. 56
Livingston TX 77351

RE: Section 106 Review Consultation, Hurricane Katrina, FEMA-1603-DR-LA

Applicant: City of New Orleans

Undertaking: Repair of Emergency Management Division Central Maintenance Garage (EMDCMG) (Lat: 29.998038, Long: -90.030699) & Construction of New Ancillary Structure (Lat: 29.999281, Long: -90.030799) (A/I # 1976)

Determination: No Historic Properties Affected

Dear Tribal Council Chairman Bullock:

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 Declaration:

- 1) FEMA-DR-1603-LA, dated August 29, 2005, as amended.

FEMA, through its Public Assistance Program, proposes to fund the repair of the EMDCMG & the construction of a new ancillary structure (Undertaking) as requested by the City of New Orleans (Applicant). 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, the Louisiana Governor's Office of Homeland Security and Emergency Preparedness, the Alabama-Coushatta Tribe of Texas, the Caddo Nation, the Chitimacha Tribe of Louisiana, the Choctaw Nation of Oklahoma, the Coushatta Tribe of Louisiana, the Jena Band of Choctaw Indians, the Mississippi Band of Choctaw Indians, the Quapaw Tribe of Oklahoma, the Seminole Nation of Oklahoma, the Seminole Tribe of Florida, the Tunica-Biloxi Tribe of Louisiana, and the Advisory Council on Historic Preservation" executed on August 17, 2009 and amended on July 22, 2011 (2009 Statewide PA as amended) and providing the Alabama-Coushatta Tribe of Texas with the opportunity to consult on the proposed Undertaking. Documentation in this letter is consistent with the requirements in 36 CFR §800.11(d).

Description of the Undertaking

The Applicant intends to repair the EMDCMG building located at 3900 Alvar St., New Orleans, Orleans Parish, Louisiana as well as engage in ground disturbing activities associated with the construction of a new ancillary structure located at the tax parcel bounded by Chickasaw St. and Alvar St., (Figure 3). The ground disturbing activities include the grading and paving of the tax

parcel for a parking lot as well as activities required for the construction of a new building. The new building will be two (2) stories in height and have a total of 2,205 sq ft (Figure 6). The paving around the building will encompass 12,180 sq ft. (Figures 4 & 5)

Area of Potential Effects (APE)

In accordance with Stipulation VII.A of the 2009 Statewide PA, as amended the APE for both the standing structures and archaeology for the new construction was developed in coordination with SHPO staff. The APE for the repair of the EMDCMG is defined as the individual facility in accordance with Stipulation VII.A of the 2009 Statewide PA, as amended. The archaeological APE takes into account all ground disturbing activities and staging areas associated with the project (Figures 1-2). The archaeological APE measures 3.2 acres (1.3 ha). The standing structure APE (Figure 2) includes the project location area as well as the surrounding view-shed.

Identification and Evaluation

On February 4, 2013, FEMA Historic Preservation Staff consulted the NRHP database and the Louisiana Cultural Resources Map and determined that the property is not located within a listed or eligible National Register Historic District nor is it located within view-shed of a property individually listed in the NRHP. The EMDCMG was constructed after 1966 and subsequently does not meet the criteria to qualify for NRHP listing under Criterion Consideration G as it is less than fifty (50) years of age. In addition, there are no existing standing structures within the APE of the new construction.

Upon consultation of data provided by SHPO on February 4, 2013, there are six recorded archaeological sites within one mile of the archaeological APE: 16OR345, 16OR347, 16OR348, 16OR349, 16OR350, 16OR351 (Figure 1). All of the sites are historic residences dating to c. 1900s to 1950s, and were recorded by a walk over after the demolition of the residence. None of the sites have been assessed for listing on the NRHP. The sites are not within the archaeological APE and will not be affected by the Undertaking.

In the 1878 Hardee map, the APE overlays a cypress swamp. In the 1932 USGS New Orleans Northeast quad the APE is undeveloped, except for the rail lines to the east. The same is seen in the 1934-50 New Orleans quad, the 1939 New Orleans East quad, and the 1954 New Orleans quad. The 1967 New Orleans quad is the first time that the APE has been subdivided into city blocks, however there are no structures present within the APE. There have been two archaeological surveys conducted within ½ mile of the APE; neither of them identified any archaeological material (see references below). The APE is within the New Orleans Low Archaeological probability zone and the soils consist of Convent-Commerce-Sharkey, a recent alluvium.

Based on all the available evidence, it is unlikely that intact archaeological deposits would be recovered during the Construction of New Ancillary Structure as the APE was originally in a cypress swamp, there is no evidence that any structure was ever built within the APE, and there have been two archaeological surveys within ½ mile of the APE and no archaeological resource were identified.

Assessment of Effects

Based on the aforementioned identification and evaluation, FEMA has determined that there are no historic properties as defined in 36 CFR 800.16(1) within the APE. Therefore, FEMA has

determined a finding of **No Historic Properties Affected** for this Undertaking and is submitting this Undertaking to you for your review and comment. FEMA requests your comments within 15 days.

We look forward to your concurrence with this determination. Should you have any questions or need additional information regarding this Undertaking, please contact Jeramé Cramer, Deputy Environmental Liaison Officer, at (504) 762-2917 or Jerame.Cramer@dhs.gov, Jason Emery, Lead Historic Preservation Specialist (Archaeology) at (504) 762-2228 or Jason.Emery@fema.dhs.gov, or Catherine Dluzak, Lead Historic Preservation Specialist (Standing Structures) at (504) 762-2423 or Catherine.Dluzak@fema.dhs.gov.

Sincerely,

Katherine Zeringue
Environmental Liaison Officer
FEMA-DR-1603-LA, FEMA-DR-1607-LA

Parsons

2004 Archaeological Survey, Architectural Survey and Evaluation of Selected 90th Regional Readiness Command Facilities in East Baton Rouge and Orleans Parishes, Louisiana. Manuscript on file at the Louisiana Division of Archaeology, Report # 22-2655.

Smith, Rhonda, Benjamin Maygarden, and Sara Orton

2003 Intensive Cultural Resources Survey, Almonaster Avenue Bridge over the Inner Harbor Navigation Canal, Orleans Parish, Louisiana. Earth Search, Inc. Manuscript on file at the Louisiana Division of Archaeology, Report # 22-2560.

CC: File
Bryant Celestine, Historic Preservation Officer
Alabama-Coushatta Tribe of Texas

Enclosures

FIGURE 1

Map Name: USGS 7.5' Spanish Fort & New Orleans East Quads with Archaeological Sites
A/I PW # 1976
Addresses: 3900 Alvar St., New Orleans, Orleans Parish, LA
Coordinates: EMDCMG- Lat: 29.998038, Long: -90.030699 &
New Ancillary Structure-Lat: 29.999281, Long: -90.030799

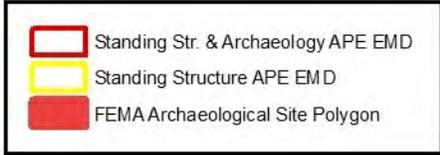
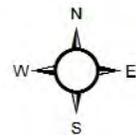
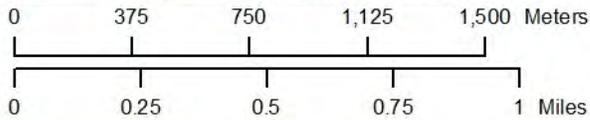
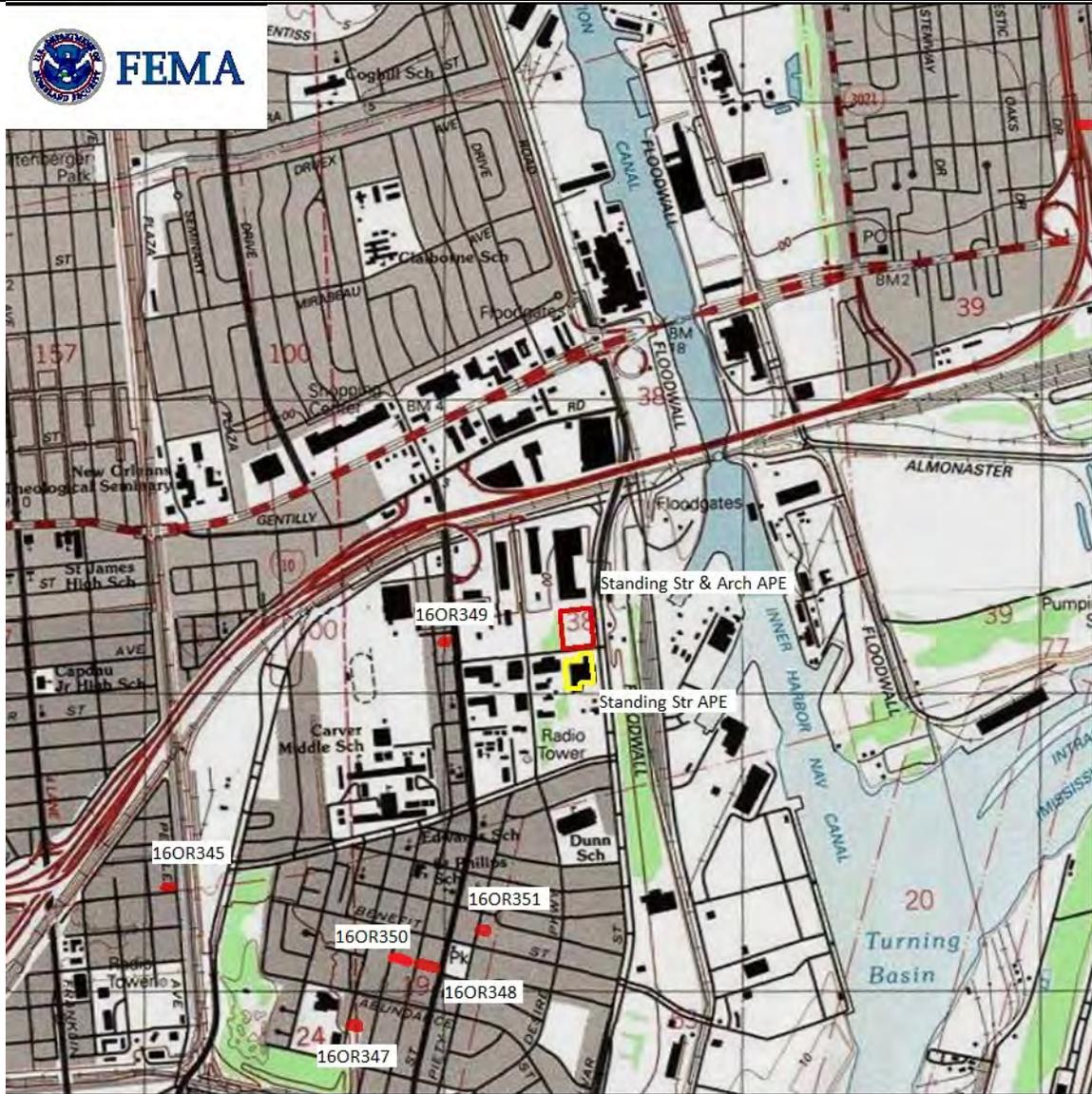


FIGURE 2

Map Name: Archaeological and Standing Structures Area of Potential Effects Map
A/I PW # 1976
Addresses: 3900 Alvar St., New Orleans, Orleans Parish, LA
Coordinates: EMDCMG- Lat: 29.998038, Long: -90.030699 &
New Ancillary Structure-Lat: 29.999281, Long: -90.030799



Standing Structures APE for repair of EMDCMG

Archaeology & Standing Structures APE for new building

Proposed building location

FIGURE 3 Site photography displaying proposed construction location-view towards north
A/I PW # 1976
Addresses: 3900 Alvar St., New Orleans, Orleans Parish, LA
Coordinates: New Ancillary Structure-Lat: 29.999281, Long: -90.030799



View of proposed project location as viewed from southwest corner looking northeast



View of proposed project location as viewed from southeast corner looking northwest

FIGURE 4

Plan of proposed ancillary building construction
A/I PW # 1976
Addresses: 3900 Alvar St., New Orleans, Orleans Parish, LA
Coordinates: New Ancillary Structure-Lat: 29.999281, Long: -90.030799

**Corrective Action Plan, AI#: 165655
Proposed Equipment Maintenance/Fuel Facility, New Orleans, LA**

Proposed Site Redevelopment

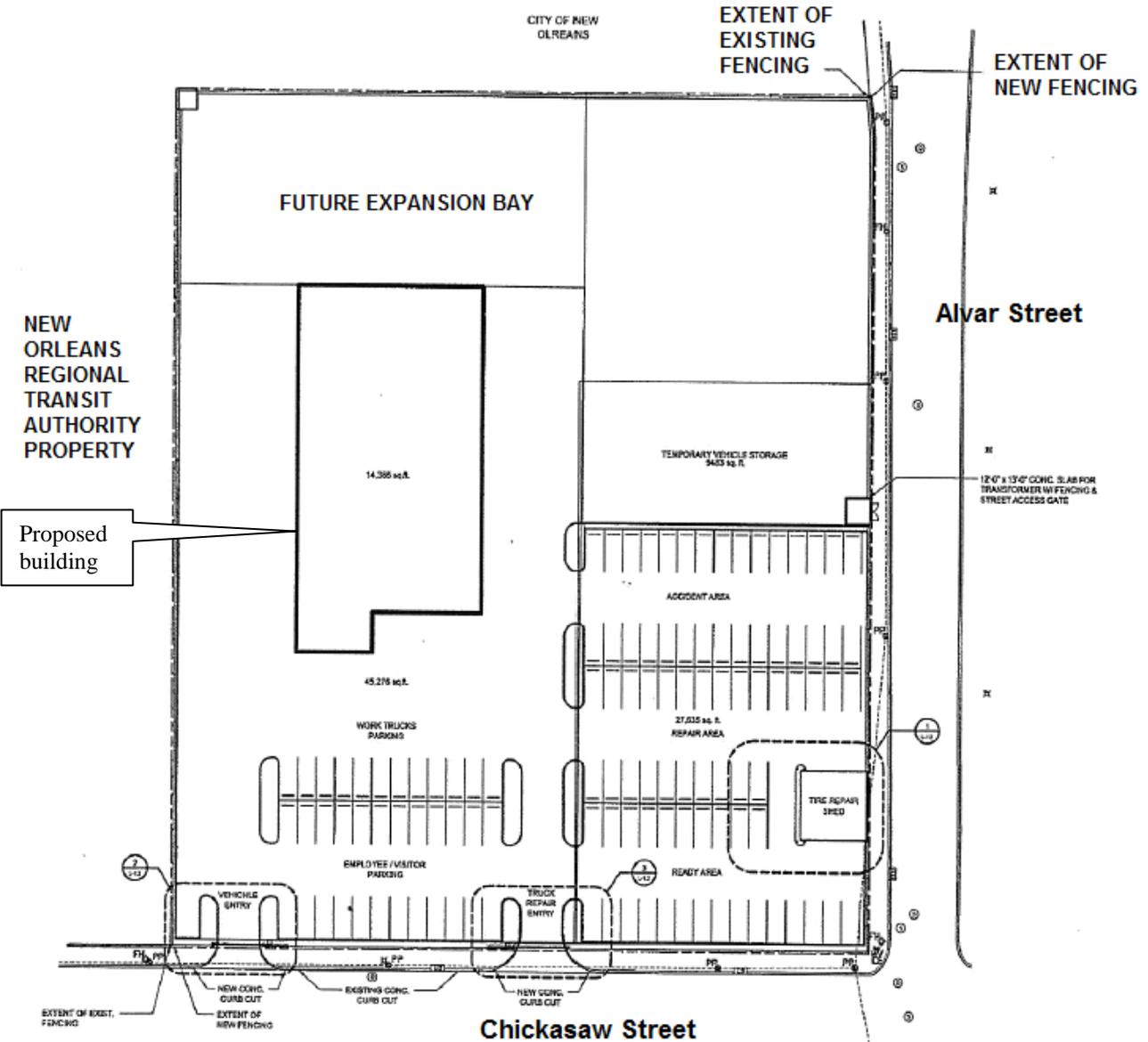
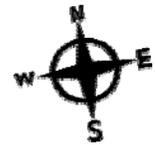
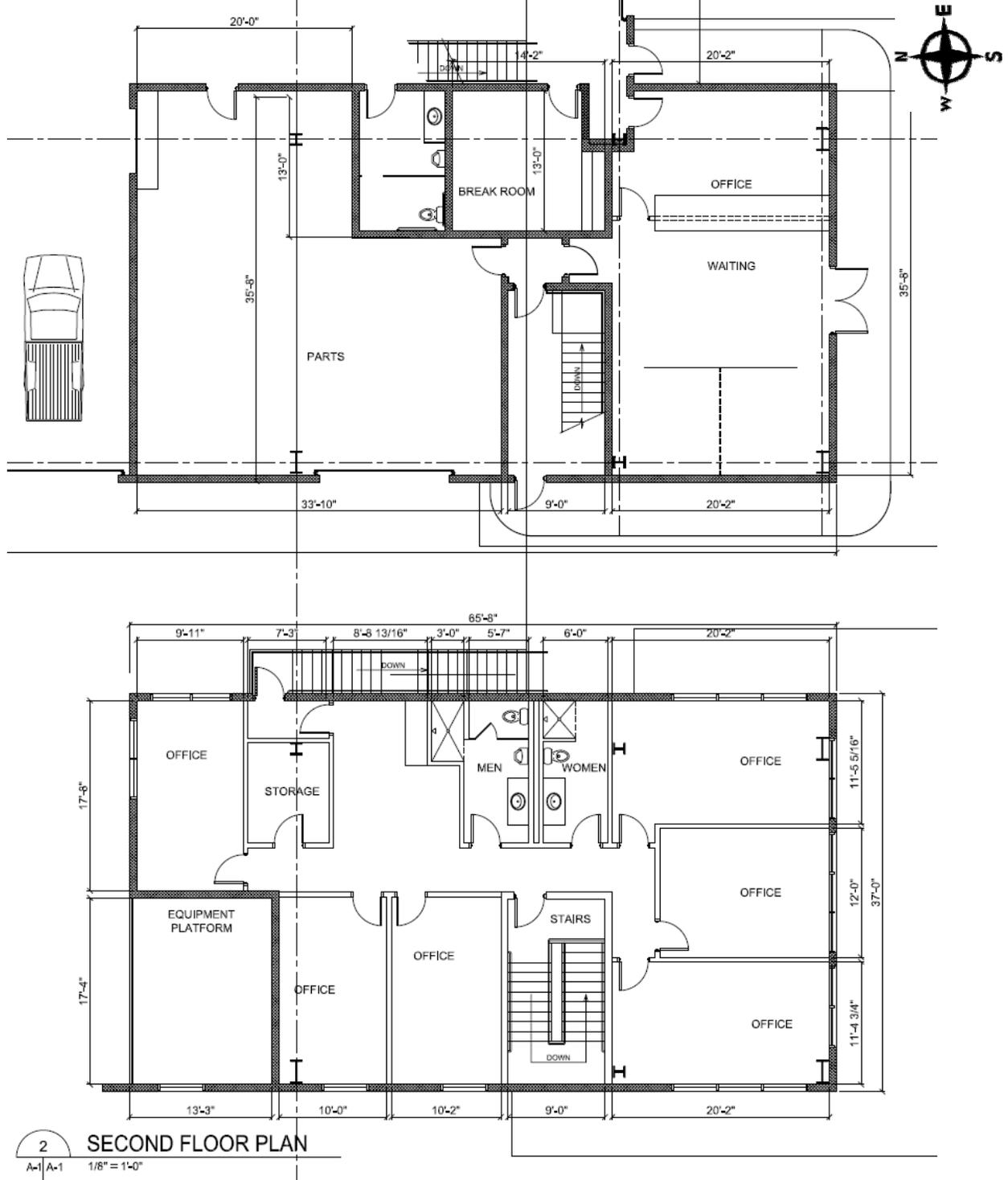


FIGURE 6

Plan of proposed ancillary building construction
A/I PW # 1976
Addresses: 3900 Alvar St., New Orleans, Orleans Parish, LA
Coordinates: New Ancillary Structure-Lat: 29.999281, Long: -90.030799





State of Louisiana
DEPARTMENT OF NATURAL RESOURCES
OFFICE OF COASTAL MANAGEMENT

03/07/2013

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

RE: P20130349, Solicitation of Views

U.S. DEPARTMENT OF HOMELAND SECURITY - FEMA

Description: Construct a 16,900 square foot maintenance facility for New Orleans Police and Fire Department's vehicles and equipment on a 3-acre site at 3900 Alvar Street in New Orleans. The pre-existing facility at 3800 Alvar Street will provide warehouse space for vehicles and equipment, and will continue its function as a fueling facility for city vehicles.

Location: 3900 Alvar Street New Orleans, LA; Lat 29° 59' 59.4"N / Long -90° 01' 52.92"W.

Orleans Parish, LA

Dear Joel Caldwell:

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 features may require additional processing time by the appropriate resource agencies: 1) Lake Pontchartrain to Vicinity Federal Diversion Project (Coastal Protection & Restoration Authority, Elizabeth Davoli, 225-342-4616). 2) The area where the project is located is all part of the aboriginal homelands of the Chitimacha Tribe of Louisiana. The permittee shall contact Kimberly S. Walden (Cultural Director) or Melanie Aymond (Research Coordinator) at (337) 923-9923 or (337) 923-4395. 3) Coordination with the Orleans levee district may be required (Federal Levee and Floodwall). Please contact the Orleans Levee District at (504) 286- 3100 or

ggillen@orleanslevee.com for additional information.

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.

If you have any questions, would like to request an application packet or would like to schedule a pre-application meeting, please contact Mike Schulze at (225) 342-0566 or mike.schulze@la.gov.

Sincerely,

A handwritten signature in black ink that reads "Karl L. Morgan". The signature is written in a cursive style with a long, sweeping underline.

Karl L. Morgan
Administrator

Karl L. Morgan/ms

Attachments

Final Plats:

- 1) [P20130349](#) [Final Plats](#) [03/04/2013](#)

cc: Orleans Levee District w/plats
Jessica Diez, OCM w/plats
Tim Killeen, CMD/FI w/plats
Orleans Parish w/plats



State of Louisiana
DEPARTMENT OF NATURAL RESOURCES
OFFICE OF COASTAL MANAGEMENT

03/06/2013

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

RE: P20130349, Solicitation of Views

U.S. DEPARTMENT OF HOMELAND SECURITY - FEMA

Description: Construct a maintenance facility for New Orleans Police and Fire Departments' vehicles and equipment at 3900 Alvar Street in New Orleans

Location: Lat 29° 59' 59.4"N / Long -90° 01' 52.92"W; 3900 Alvar Street New Orleans, 70126
Orleans Parish, LA

Dear Joel Caldwell:

You are hereby advised that your application for a Coastal Use Permit (CUP) has been determined to be complete and review by the State for compliance with the Louisiana Coastal Resource Program (LCRP) and consistency with the federal Coastal Zone Management Act (CZMA) has begun. Additionally, it has been determined that your proposed activity is a use of state concern in accordance with Louisiana Revised Statute 49:214.5.

All correspondence and calls regarding this application should reference the Coastal Use Permit Number (P#) indicated above. Please note that all information concerning your application is in our database and is updated throughout the day as changes to the status of the application occur.

Your application can be found on our [Webpage](#).

Should you have any questions, please check the online database or contact the assigned permit analyst: Mike Schulze at (225) 342-0566 or mike.schulze@la.gov. Be sure to reference the above Coastal Use Permit Number.

A handwritten signature in black ink, appearing to read "Chris Melton".

Permit Coordinator

CM

P20130349, Solicitation of Views
U.S. DEPARTMENT OF HOMELAND SECURITY - FEMA
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cc: Martin Mayer, COE

U.S. DEPARTMENT OF HOMELAND SECURITY - FEMA

Appendix C

Public Notice

**FEMA'S PUBLIC NOTICE OF AVAILABILITY FOR
THE EMERGENCY MAINTENANCE DIVISION (EMD)
CENTRAL MAINTENANCE AND FUEL FACILITY
EXPANSION PROJECT
ORLEANS PARISH, LOUISIANA
DRAFT ENVIRONMENTAL ASSESSMENT AND DRAFT
FINDING OF NO SIGNIFICANT IMPACT**

Interested parties are hereby notified that the Federal Emergency Management Agency (FEMA) has prepared a Draft Environmental Assessment (DEA) and a Draft Finding of No Significant Impact (FONSI) for the City of New Orleans' (CNO) proposed expansion of the Emergency Maintenance Division (EMD) Central Maintenance and Fuel Facility located at 3900 Alvar Street, New Orleans, Louisiana. The approximate geographic coordinates of the EMD Central Maintenance and Fuel Facility are Latitude 29.9998, Longitude -90.03136. In order to restore services, facilities, and resources lost as a result of Hurricane Katrina, CNO seeks federal grant funds for the construction of a new 16,900 square foot facility at 3900 Alvar Street. The proposed building would be used as a repair center and storage facility for equipment and vehicles, expanding the EMD's current maintenance and warehousing capabilities. These functions were previously provided by a 61,000 square foot facility located at 3800 Alvar Street which was damaged as a result of Hurricane Katrina. This damaged facility has been minimally repaired so as to retain its storage and fuel service capabilities.

CNO seeks federal grant funds for this action eligible under a Presidential Disaster Declaration signed on August 29, 2005 (FEMA-1603-DR-LA). Per the National Environmental Policy Act (42 U.S.C. 4371 *et seq.*), and associated environmental statutes, a DEA has been prepared to evaluate the action's potential impacts on the human and natural environment. This DEA summarizes the purpose and need, site selection process, alternatives to the proposed action, affected environment, and potential environmental consequences associated with the proposed action.

The DEA and draft Finding of No Significant Impact (FONSI) will be available for public review at the Orleans Parish Main Library at 219 Loyola Avenue, New Orleans, Louisiana 70112 (hours are 10:00 AM to 6:00 PM, Mon.-Thurs. and 10:00 AM to 5:00 PM Fri. & Sat.) and the Alvar Branch at 913 Alvar Street 70117, New Orleans, Louisiana 70117 (hours are 10:00 AM to 7:00 PM, Mon.-Thurs. and 10:00 AM to 5:00 PM Sat.). Additionally, a public notice regarding the proposed action will be published in the Times-Picayune newspaper for three (3) publishing days: May 22, 24, and 26, 2013. The comment period will be fifteen (15) days, concluding on June 10, 2013. Written comments on the DEA/Draft FONSI or related matters can be faxed to FEMA's Louisiana Recovery Office at (504) 762-3232; or mailed to FEMA Louisiana Recovery Office, EHP – EMD Central Maintenance and Fuel Facility EA, 1 Seine Court, New Orleans, Louisiana 70114. The DEA can be viewed and downloaded from FEMA's website: <http://www.fema.gov/environmental-planning-and-historic-preservation-program/environmental-documents-public-notices-2>

Based on FEMA's findings to date, no significant adverse environmental effects are anticipated. However, if FEMA receives new information that results in a change from a no adverse effect

determination, then FEMA would revise the findings and issue a second public notice allowing time for additional comments. However, if there are no changes, this DEA will become the Final EA.

If no substantive comments are received, the DEA and associated FONSI will become final and this initial Public Notice will also serve as the final Public Notice. Substantive comments will be addressed as appropriate in the final documents.