

LIST OF APPENDICES

FEMA has worked to ensure that this EA document is accessible to persons with disabilities, in compliance with Section 508 of the Rehabilitation Act of 1973. Regarding the EA's Appendices, which are provided in a separate document, this EA has reported what was done and how those results affect the decision that will be made based on the totality of the EA findings. In case any of these appendices poses a challenge to be read electronically by persons with disabilities, each appendix is briefly described and summarized below, rather than being simply listed.

Appendix A. Site Photos. This document provides photos that show typical views of each site described in the EA. The photos provide the reader with a visual of the current conditions of each site. Photos were taken in October 2022 during site visits conducted by FEMA EHP staff.

Appendix B. 100% Complete Drawings and Designs; DPS 01 Watershed Drainage Phase I. This 122-page set of construction drawings is dated November 2020. It was prepared by CDM Smith, DE digital engineering & Imaging, Inc., and Dana Brown & Associates. It bears an inked impression of a Professional Engineer seal from each company, indicating that it is accurate and complete in their professional opinion. This set of drawings contain the designs construction of mainly parks and stormwater lots. There would be some street work, but not the focus of this set. *100% Complete Drawings and Designs; DPS 01 Watershed Drainage Phase II part 1.* This 101-page set of construction drawings is dated November 2020. It was prepared by CDM Smith, DE digital engineering & Imaging, Inc., and Dana Brown & Associates. It bears an inked impression of a Professional Engineer seal from each company, indicating that it is accurate and complete in their professional opinion. This part 1 of 2 set of drawings contain the designs the construction of mainly streets and corner street basins. There would also be a park and a square, but not the focus of the work. *100% Complete Drawings and Designs; DPS 01 Watershed Drainage Phase II part 2.* This is a continuation of part 1 and contains 80 pages. *DPS 01 Watershed (old Broadmoor HMGP) Drainage Upgrades and Green Infrastructure Project – Scope of Work (Phase II Revisions) by CDM Smith, dated March 10, 2022.* This is a memorandum addressed to Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP) from Erika Boerr, City of New Orleans. It is dated March 10, 2020 and was revised August 14, 2020 and updated on October 11, 2022. The 35-page document, prepared by CDM Smith, details the scope of work for this proposed project and includes figures, cross sections and other visuals to provide a complete view of the project. It also summarizes remediation efforts for the parks as described in the EA. *DPS 01 Watershed Drainage Upgrades and Green Infrastructure Project Phase 1 Preliminary Design Report by CDM Smith, dated November 15, 2017 (CDM Smith 2017).* This document is comprised of 39 pages of memorandum supplemented by Appendices A through C, The intent of this Preliminary Design Report (PDR) is to summarize the activities performed, provide and describe significant calculations, and describe the preliminary 60% design for Phase 1 of the City of New Orleans Drainage Pump Station (DPS) 01 Watershed Drainage Upgrades and Green Infrastructure Project. The information includes specific intervention types, locations, coordination, permitting requirements, and a summary of the opinion of probable construction cost (OPCC).

Due to the inability to make the above documents 508 accessible they are not included in the published EA but are available by request. The two (2) documents listed below are included in Appendix B of the published EA.

90% H&H Technical Memo dated February 8, 2019. This is a technical Memorandum drafted CDM Smith bears an inked impression of Jenny E Bywater's Professional Engineer seal. The memo is addressed to Erika Boerr, City of New Orleans. The purpose of the memo is to summarize the results of the Hydrologic and Hydraulic (H&H) modeling for the overall proposed project and for individual project elements to confirm performance and sizing. The modeling also calculates expected flood stage reduction from the project. *H&H Model No Impact Letter dated August 12, 2019.* This is a letter was drafted by CDM Smith bears the signature of Jessica Watts, Professional Engineer. It is addressed to Erika Boerr, City of New Orleans and provides a statement of no negative impacts as a result of changes in design between the modeled 90% design and the final designs.

Appendix C. Agency Correspondence. This section is comprised of the Solicitation of Views sent out to

resource agencies and their responses. A solicitation of views prepared by Cragin Knox of Gulf South Research Corporation and sent to Louisiana Department of Environmental Quality, Louisiana Department of Wildlife and Fisheries, U.S. Army of Engineers, U.S. Fish and Wildlife Services, and U.S. Environmental Protection Agency on May 1, 2017. The email contained a narrative SOW, construction plans, and maps. Karen L. Clement, U.S. Army of Engineers responded on July 18, 2017, via emailed letter that there are no known adverse impacts to Corps of Engineers projects and a Department of the Army Permit under Section 404 would not be required. Carolyn Michon, Louisiana Department of Wildlife and Fisheries responded on May 31, 2017, via emailed letter stating there are no impacts to rare, threatened, or endangered species or critical habitats. Amy Trahan, U.S. Fish and Wildlife Service responded on May 25, 2017, via stamped of concurrence on the solicitation of views that no effects to T&E resources are expected. Keith Horn, Louisiana Department Quality responded on June 9, 2017 stating that LDEQ Remediation Division had identified several sites within the project area and If the project will involve the excavation of any soils which may exceed the Non-Industrial (Residential) or Soil Protective of Groundwater Screening Option Standards established by the LDEQ Risk Evaluation/Corrective Action Program (RECAP) Regulation, these materials may be considered a waste and disposed of at a permitted facility, or might be managed as part of a Solid Waste Beneficial Use or Soil Reuse in accordance with LAC 33:VII.Chapter 11. Alternately, a site-specific RECAP Evaluation might be conducted. Natural Resource Conservation Service responded on July 20, 2017 that the project is exempt from the rules and regulations of Farmland Protection Policy Act. On May 9, 2019, Karl Morgan, Louisiana Department of Natural Resources Office of Coastal Management responded to CDM Smith's request for determination stating the project is exempt and a Coastal Use Permit is not required. On December 9, 2022, FEMA EHP provided to consulting parties the final Abbreviated Consultation Process document, detailing the resolution of adverse effects with specific treatment measures, all associated consultations, and project background in compliance with Section 106 of the National Historic Preservation Act.

Appendix D. Final Corrective Action Plan (CAP), LDEQ Final Approvals. This appendix contains various documents that showcase CNO's coordination with LDEQ in resolving the remediation requirements as a result of hazardous materials found on the sites. *Saratoga CAP dated April 25, 2019*, is a 21-page document prepared by Leaa Environmental, LLC. The first page is a letter addressed to Mr. Percy Harris of LDEQ from Emily Reeves of Leaa Environmental and addresses Leaa's submission of the CAP for the former Saratoga Street Incinerator on behalf of City of New Orleans (CNO). It contains images of stamps documenting the dates LDEQ received the document and is followed by the 20-page CAP and appendices of figures, tables, and references. ***Due to the inability to make this document 508 accessible they are not included in the published EA but are available by request. The two (2) documents listed below are included in Appendix D of the published EA.***

Corrective Action Work Plan Approval former Saratoga Street AI Number 44056 dated June 28, 2019 is a 2-page letter to Erika Boerr, CNO from Edwin Akujobi, LDEQ that states approves CNO's CAP plan for the Saratoga site. *Request for Letter of No Objection Drainage Upgrades and Green Infrastructure Orleans Parish dated October 3, 2019*, is a 3-page letter from Elliott Vega, LDEQ to Erika Boerr, CNO. The first page is LDEQ's no objection to CNO's Solid Waste Management Plan for the Broadmoor Drainage project sites listed in an email dated July 9, 2019. The letter includes one condition of LDEQ's approval as described in the EA. The following 2 pages contain the email that was submitted to LDEQ from Emily Reeves, Leaa Environmental. The email summarizes the project and states that the excavation and disposal of soil is required. It further lists each project site contained within the project. The email goes on to describe the soil sampling and testing that Leaa will conduct to determine appropriate disposal methods. *No Further Action Notification (NFA) Letter for former South Saratoga Street Incinerator AI Number 44056 dated September 14, 2023* is a 4-page letter from LDEQ's Remediation Division Administrator Estuardo Silva. The LDEQ provided the CNO with a notification and Basis of Decision that No Further Action is necessary at the Saratoga area of investigation and stating that chemical concentrations are protective of human health and the environment.

Appendix E. Eight-Step Planning Process for Floodplains and Wetlands, Floodplain Administrator Letter of Support. This document walks through the 8-step planning process as required by 44 CFR Part 9 (8-step is drafted but needs updated with final PN information) Jerome Landry, City of New Orleans

Department of Safety and permits Building Inspection Division, issued a letter of concurrence on May 1, 2017 stating the project will be in compliance with Chapter 78 of the City of New Orleans Code of Ordinances, the Flood damage Prevention Ordinance. This document, completed by Melanie O'Keefe and dated January 4, 2023, goes through the actions and their potential affects on and by the floodplain and/or wetlands. The study area is located within the X Zones according to the Effective DFIRM Panel Numbers 22071C0228F, 22071C0229F, and 22071C0237F, all dated November 30, 2016. The conclusion is that there is no practicable alternative, reasonable avoidance and/or minimization techniques can be applied, and the action outweighs any potential adverse effects to or by the floodplain and/or wetlands. The City of New Orleans Department of Safety and Permits Office of Coastal and Floodplain Management reviewed the proposed work and determined that it will be in compliance with Chapter 78 of the City of New Orleans Code of Ordinances, dated May 1, 217.

Appendix F. Permits (USACE Levee, Orleans Parish Levee Board, Coastal Use Permit (CUP)). This appendix contains permits that CNO has received for the construction of this project. *Louisiana Department of Natural Resources Office of Coastal Management (LDNR-OCM) Request for Determination dated May 9, 2019.* This is an 8-page document that includes agency correspondence received as part of the Coastal Use Permit application. The 2nd page of the document contains a table that organizes the office, commentor, comment date, and comments agencies provide in response to the CUP application. Pages 3-6 is the CMD Permit Coding forms. Pages 6-8 are the letter sent from Louisiana Department of Natural Resources Office of Coastal Management (LDNR-OCM) to CDM Smith in response to the Request for Determination for the project. The letter states that although the project is within the coastal zone, the project is exempt, and a CUP is not required. *Southeast Louisiana Flood Protection Authority-East (SLFPA-E) Application and Permit dated February 20, 2019.* This 11-page document starts with the application for permission from the levee board to complete components of the project which are approximately 30-1500 feet landward of the Mississippi River levee. The application was submitted by Robert Haydel, CDM on behalf of Erika Boerr, CNO. Page 3 begins the letter from SLFPA-E which grants CNO permission to conduct the project. The documents outlines 28 specific conditions including a statement that No waiver will be granted due to the proximity to the flood protection. All excavations and sub-surface work within 300 feet of the floodwall shall be performed, completed, and backfilled during Mississippi River stages below +11.0 feet on the Carrollton Gage. Page 7 starts the email submission from Madeline Cefolia, USACE dated March 12, 2020 to the local flood authority responding to their request for a letter of no objection. The email states USACE does not object to the project and provides five conditions for the project. Page 9 of the document contains the Orleans Levee District permission for the project. It is dated February 18, 2019. The letter also includes 14 conditions.

Appendix G. Public Notice and Draft FONSI. This appendix contains the Public Notice and the Draft Finding of No Significant Impact (FONSI) that are provided in their entirety.

Appendix A: Site Photos



Figure 1: A.L. Davis Park as seen from the intersection of LaSalle Street and Washington Avenue



Figure 2: A.L. Davis Park as seen from 3rd Street



Figure 3: Proposed stormwater lot at 3621 3rd Street



Figure 4: Proposed stormwater lot at 3623 3rd Street



Figure 5: Proposed stormwater lot at 3200 Jackson Avenue



Figure 6: Proposed stormwater park at the current Taylor Playground as shown standing at the Derbigny Street and 3rd Street intersection



Figure 7: Proposed stormwater park at the current Taylor Playground as shown standing on Derbigny Street facing north



Figure 8: Proposed stormwater park at the abandoned Saratoga Park



Figure 9: Proposed stormwater park at the Burke Playground



Figure 10: Playground closest to school as seen looking northeast from Philip Street



Figure 11: Basketball court on the Van McMurray Playground



Figure 12: The Southeast area of the fenced Van McMurray playground



Figure 13: Typical conditions of Annunciation Square Park



Figure 14: Typical conditions of Annunciation Street, as seen from its intersection with 3rd Street, where the proposed redevelopment will occur



Figure 15: Typical conditions of Annunciation Street, as seen from its intersection with 3rd Street



Figure 16: Typical conditions of Saint Thomas Street, as seen from its intersection with Race Street



Figure 17: Typical conditions of Chippewa Street, as seen from its intersection with 3rd Street



Figure 18: Typical conditions of Baronne Street, as seen from its intersection with Martin Luther King Jr. Boulevard, where the road reconstruction with bioswales is proposed



Figure 19: Typical conditions of Saint Thomas Street, as seen from its intersection with Washington Street, where the road reconstruction with bioswales is proposed



Figure 20: Typical conditions of Philip Street, as seen from its intersection with Chippawa Street facing north, where the road reconstruction with bioswales is proposed



Figure 21: Typical conditions of Philip Street, as seen from its intersection with Chippewa Street facing south, where the road reconstruction with bioswales is proposed



Figure 22: Typical conditions of Coliseum Street, as seen from its intersection with Melpomene Street, where the road reconstruction with bioswales is proposed



Figure 23: Typical conditions of Coliseum Street as seen from its intersection with Race Street, where the road reconstruction with bioswales is proposed

Appendix B: Designs, Drawings, and Reports



Technical Memorandum

To: Erika Boerr, City of New Orleans

From: Jenny Bywater, P.E. CDM Smith
Jessica L. Watts, P.E. CDM Smith

Date: February 8, 2019

Subject: DPS01 Drainage Upgrades and Green Infrastructure Hazard Mitigation Grant Program (HMGP) Project - 90% Design Hydrologic & Hydraulic (H&H) Model Summary



Background

To support the FEMA HMGP Project, CDM Smith performed hydrologic & hydraulic (H&H) modeling for the overall project and for individual project elements to confirm performance and sizing. The modeling also calculates expected flood stage reduction from the project which is utilized in the benefit-cost-ratio analysis (BCR) by FEMA and supporting contractors.

CDM Smith developed multiple models in US EPA StormWater Management Model (SWMM) for the City's Stormwater Drainage Master Plan (SDMP) in 2010. Since then, the Broadmoor area model was revised by others. Based upon review of the revised model and actual design and operating conditions, CDM Smith corrected the revised model for this project design as described below.

Development of the model and analysis to initially screen design alternatives were documented in the Schematic Design Report submitted to the City of New Orleans in November of 2016. Preliminary design was subsequently completed, and the model was revised to help determine the BCR. The Phase I and Phase II Preliminary Design Reports were submitted to the City of New Orleans in November 2017 and October 2018, respectively.

As design has progressed following the preliminary design reports, the model has continued to be updated and this technical memorandum provides a summary of results incorporating the current 90% design of both Phase I and Phase II.

Model Development

Overview

As noted above, the SWMM H&H model for the Drainage Pump Station (DPS) 01 service area was derived from the model originally developed by CDM Smith for the 2010 SDMP, then modified by other consultants for the New Orleans Sewerage & Water Board (S&WB). The revisions by others combined the DPS 01 and DPS 06 service areas, and added S&WB elements and additional areas outside of the scope of the SDMP. This modified version was provided to CDM Smith by the City, prior to validation and final review by the other consultant.

CDM Smith reviewed the revised/combined model and found connectivity and continuity issues outside the DPS 01 service area (outside of the Study Area for this Broadmoor project), and that the DPS 01 maximum pump capacity in the model was at the full 7,200 cfs capacity. Since the downstream Palmetto canal capacity is limited to 5,700 cfs, this maximum pump rate was revised to 5,700 cfs.

Model revisions were also made to the area tributary to the DPS01 Pump Station, including the Broadmoor project area, but not downstream of the pump station since the Broadmoor Project area is unaffected by model changes to these areas.

The project area, DPS01 watershed and location of DPS 01 are shown in **Figure 1**.

Design Rainfall Events

A series of design storms are utilized in the model to test the performance of the proposed projects. The design rainfall events used are based on statistics developed from a Network Storage, Treatment, Overflow, Runoff Model (NetSTORM) analysis based on a Natural Resource Conservation Service (NRCS), formerly the Soil Conservation Service (SCS) distribution. **Table 1** presents depth-duration-frequency statistics for New Orleans based on the 1954 to 2009 precipitation records as computed in NetSTORM. The depth for each storm event was distributed over the 24 hours using a Type III SCS distribution.

Table 1: Design Storm Depths

Return Interval (Yrs)	Precipitation (inches) for 24-hr Duration
1-Year	4.2
2-Year	5.4
5-Year	7.0
10-Year	8.5
100-Year	16.2



Figure 1: DPS 01 Location, Watershed and Project Area

Modeling of Project Elements

Proposed project elements were incorporated into the baseline model of the existing system. Note that due to the resolution of the model, green infrastructure is not modeled to the level of detail of design. Approximations have been made regarding inlets and outlets and some storage elements have been combined. Overall storage available is approximated as closely as possible based on the current design. It should also be noted that overland street flow channels are used in the model and checks were made to avoid potential double-counting of storage while correctly representing large design storm overland flow routing.

Although SWMM contains Low-Impact Development (LID) modules that allow for the modeling of several types of green infrastructure, these modules were not used for this project because they do not directly model the necessary hydraulics. The benefit of green infrastructure for this analysis is

modeled through the storage, specifically how the additional storage can reduce or eliminate peak flood depths. This requires modeling the green infrastructure in the hydraulic layer of the model with approximations of how the stormwater flows into and out of the available storage. To do this, the following hydraulic components were used:

- **Storage Nodes:** Each represent the total volume of storage available for each green infrastructure type at a similar resolution to the model (typically per city block) taking into account open storage (100% void space) and media-filled storage (less than 100% void space).
- **Conduit Links:** Conduits were used to represent inlet and/or outlet pipes connecting the green infrastructure to the pipe system. Conduits were also used to represent a street section where stormwater entered the green infrastructure from surface flow.
- **Weir Links:** Weirs were used to represent curb inlets from surface flow to storage components.
- **Orifice Links:** Orifices were used to represent outlets from the green infrastructure storage.

Flood Reduction Results

Since the study area is relatively flat and low with limited storage, flood stage reductions are more significant for smaller storms (1- to 5-year) and tend to be negligible for larger storms (10-year and above). The majority of the benefits occur for these more frequent, smaller storms which support the necessary benefit to cost ratio of 1.0 or greater.

Inundation maps were created by taking the maximum water depth of each modeled node and creating a projected maximum water elevation surface within ArcGIS. This projected maximum water elevation surface was then compared to the ground surface to determine areas with projected flooding. The inundation maps were created for each design storm under both base existing and proposed project conditions. These maps present the highest level of flooding that would be present during the modeled storm events. The maps do not indicate the duration of flooding and different portions of the City might reach peak flood stage at different times. These inundation maps are provided in **Attachment A**.

Maps showing the difference in flooding for each design storm between the existing and proposed conditions are also included within **Attachment A**. These maps make it easier to visualize the flood reduction benefits of the proposed project. While projects only occur within the specified project area, beneficial impacts can be seen in the wider DPS 01 watershed. This is because the water that is collected, and detained/retained in the proposed project infrastructure, particularly in the upper watershed, frees up capacity in the collection system existing infrastructure and allows improved drainage downstream.

Upstream / Downstream Impacts Outside of DPS 01

An important modeling consideration is any upstream and downstream impacts from the proposed project improvements outside of the DPS 01 project area. The results in this section show that there are no projected project impacts either upstream or downstream of the DPS 01 watershed. There are no upstream areas draining into the DPS 01 watershed and the only outfall of the watershed is the pump station which is constrained by the downstream Palmetto Canal.

Model Outfalls

The only outfall of the watershed is DPS 01. DPS 01 pumps into the canal along Washington Avenue and Palmetto Street before joining with the canal running along Monticello Avenue. The combined flow is then pumped by DPS 06 into the 17th Street Canal and continues to flow to the 17th Street Canal Pump Station where it is pumped into Lake Pontchartrain.

The limiting factor for flood mitigation in the DPS 01 watershed is the maximum capacity of the downstream Palmetto Canal (5,700 cfs), which is less than the DPS 01 capacity of 7,200 cfs. As noted above, the maximum pump station capacity in the model was revised to 5,700 cfs to represent the maximum capacity of the downstream Palmetto Canal. If improvements can be made to the Palmetto Canal or an additional outfall route is available from DPS 01, the pump station has another 1,500 cfs of capacity.

Upstream Analysis

There are no upstream areas draining into the DPS 01 watershed. The watershed is bounded by the Mississippi River Levee at the upstream end. The DPS 06 watershed neighbors to the west, while the DPS 02 watershed neighbors to the east.

Downstream Analysis

Analysis of the node and link just downstream of DPS 01 for the 1-, 2-, 5-, 10-, and 100-year 24-hour design storms show the same maximum flow in the canal under existing and proposed conditions (**Table 2**) and typically very minor changes in depth (**Table 3**). This is as expected since the pump station is constrained in the model to the necessary 5,700 cfs.

Table 2: Downstream Flow in Palmetto Canal [Link: CJ12425]

Design Storm	Maximum Flow (cfs)		
	Base Existing	Proposed	Improvement
1-Year Storm	5,700	5,700	0
2-Year Storm	5,700	5,700	0
5-Year Storm	5,700	5,700	0
10-Year Storm	5,700	5,700	0
100-Year Storm	5,700	5,700	0

Table 3: Downstream Depth in Palmetto Canal [Node: J12425]

Design Storm	Maximum Depth (ft-NAVD)		Improvement
	Base Existing	Proposed	
1-Year Storm	16.41	16.16	0.25
2-Year Storm	18.46	18.25	0.21
5-Year Storm	19.47	19.38	0.09
10-Year Storm	20.46	20.22	0.24
100-Year Storm	23.90	23.82	0.08

Example traces of flow and depth curves for the 10-year storm are provided in **Figure 2** and **Figure 3**. No impacts downstream of DPS 01 (positive or negative) are predicted based on the model analysis.

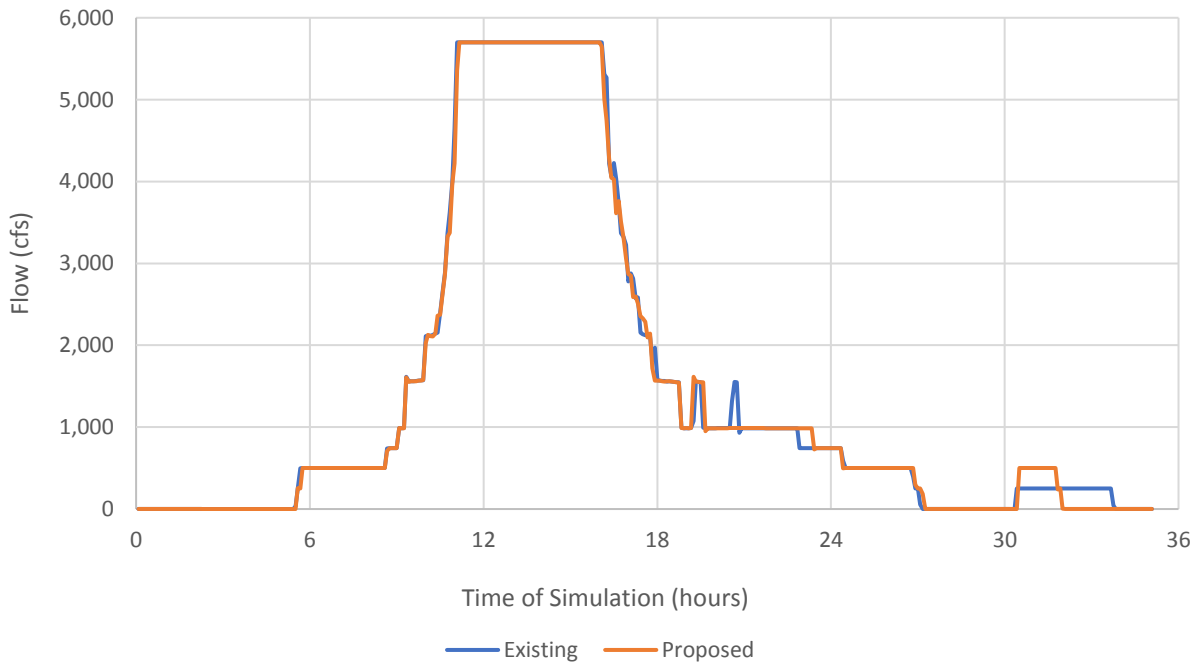


Figure 2: Flow in the Palmetto Canal Downstream of DPS 01 during the 10-Year Storm (cfs)

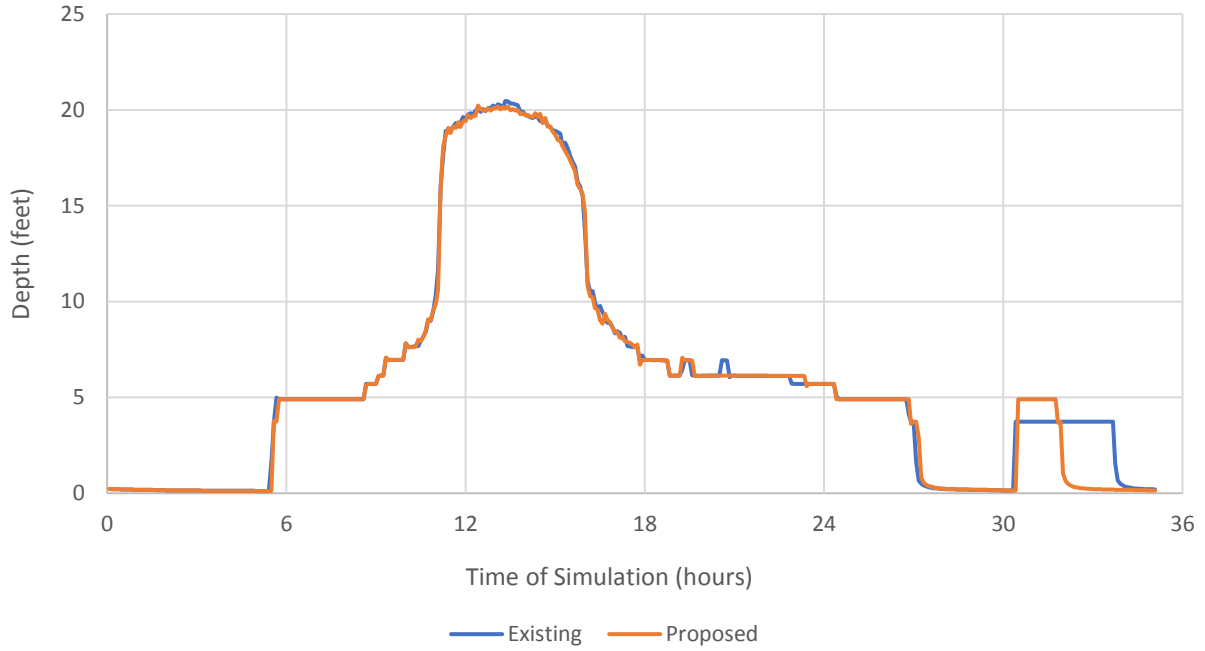
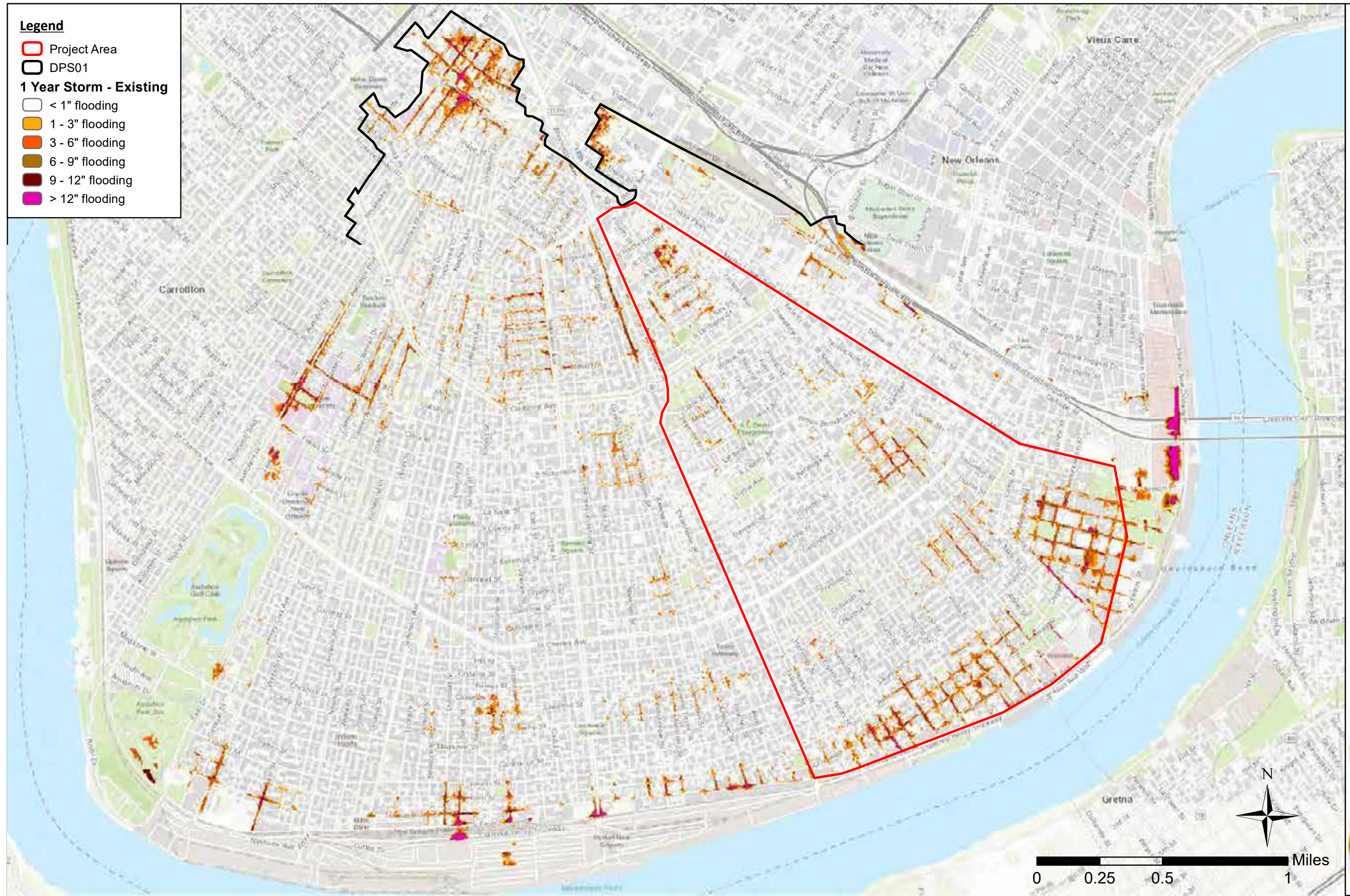


Figure 3: Depth in the Palmetto Canal Downstream of DPS 01 during the 10-Year Storm (feet)

Attachment A: Inundation Maps

Legend

- Project Area
- DPS01
- 1 Year Storm - Existing**
- < 1" flooding
- 1 - 3" flooding
- 3 - 6" flooding
- 6 - 9" flooding
- 9 - 12" flooding
- > 12" flooding

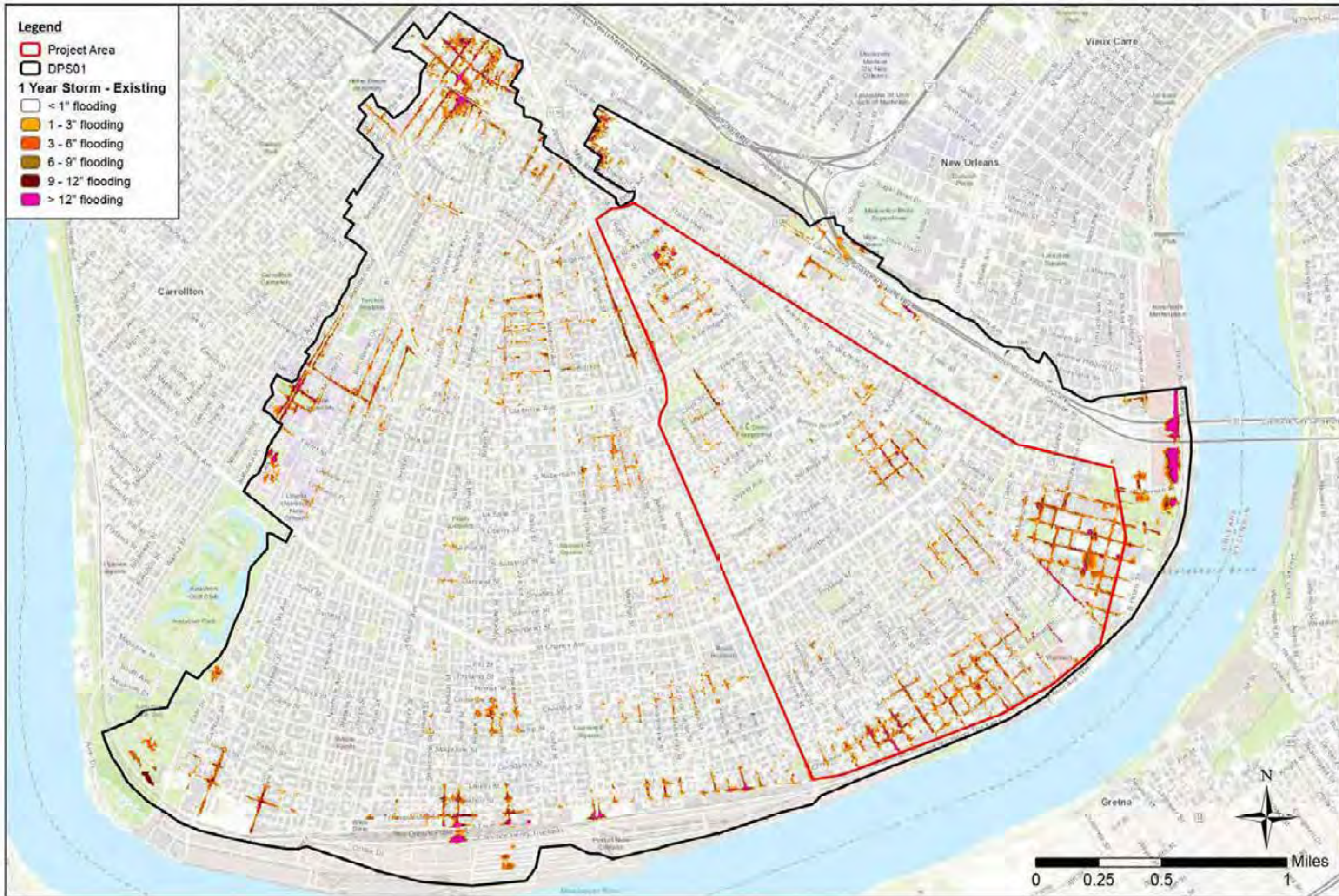


**DPS 01 Watershed
 Drainage Upgrades and Green Infrastructure Project
 Projected Existing Condition Flooding - 1 Year Storm**



Legend

-  Project Area
-  DPS01
- 1 Year Storm - Existing**
-  < 1" flooding
-  1 - 3" flooding
-  3 - 6" flooding
-  6 - 9" flooding
-  9 - 12" flooding
-  > 12" flooding

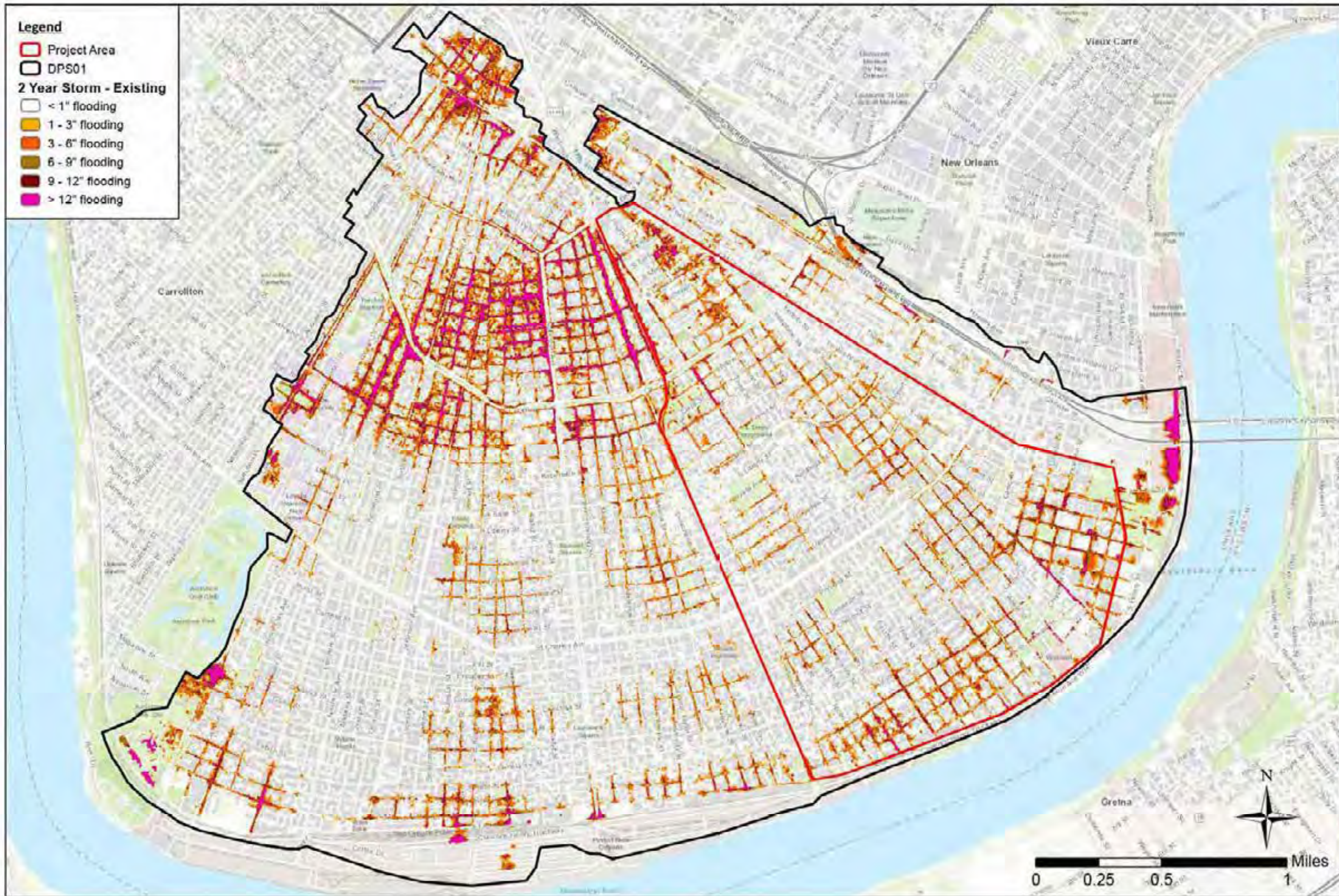


**DPS 01 Watershed
Drainage Upgrades and Green Infrastructure Project
Projected Existing Condition Flooding - 1 Year Storm**



Legend

-  Project Area
-  DPS01
- 2 Year Storm - Existing**
-  < 1" flooding
-  1 - 3" flooding
-  3 - 6" flooding
-  6 - 9" flooding
-  9 - 12" flooding
-  > 12" flooding

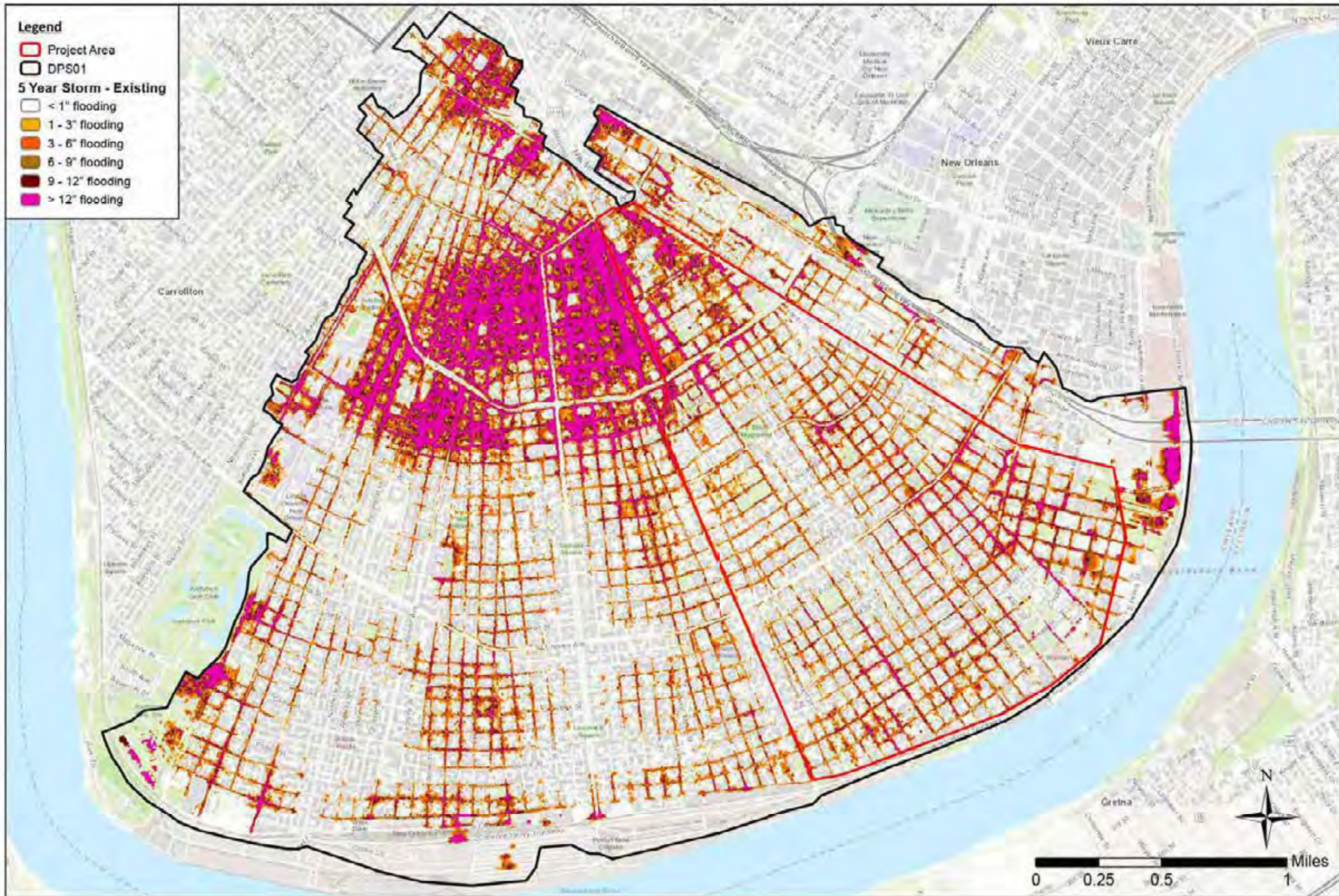


**DPS 01 Watershed
Drainage Upgrades and Green Infrastructure Project
Projected Existing Condition Flooding - 2 Year Storm**



Legend

-  Project Area
-  DPS01
- 5 Year Storm - Existing**
-  < 1" flooding
-  1 - 3" flooding
-  3 - 6" flooding
-  6 - 9" flooding
-  9 - 12" flooding
-  > 12" flooding

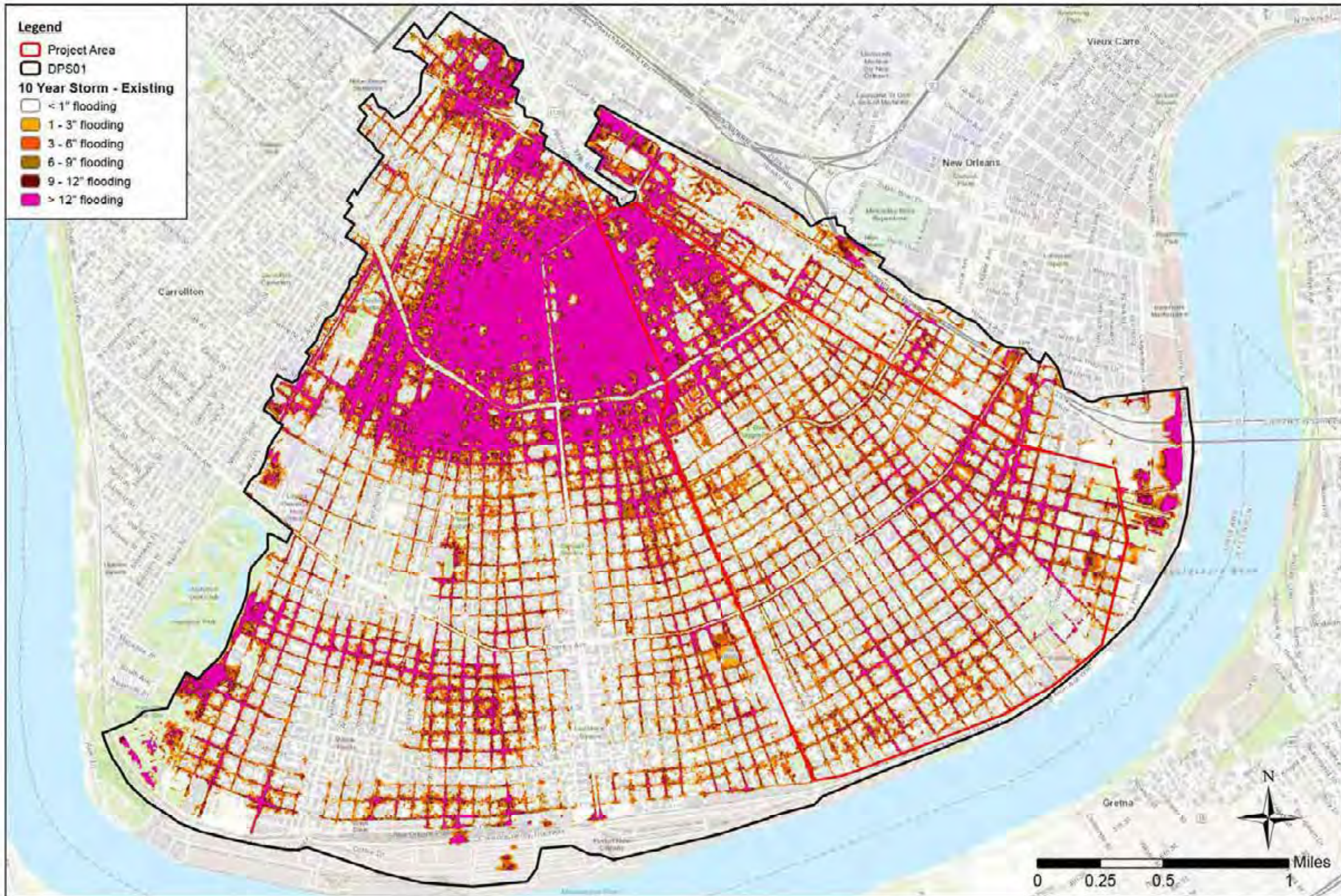


**DPS 01 Watershed
Drainage Upgrades and Green Infrastructure Project
Projected Existing Condition Flooding - 5 Year Storm**



Legend



-  Project Area
-  DPS01
- 10 Year Storm - Existing**
-  < 1" flooding
-  1 - 3" flooding
-  3 - 6" flooding
-  6 - 9" flooding
-  9 - 12" flooding
-  > 12" flooding










**DPS 01 Watershed
Drainage Upgrades and Green Infrastructure Project
Projected Existing Condition Flooding - 10 Year Storm**

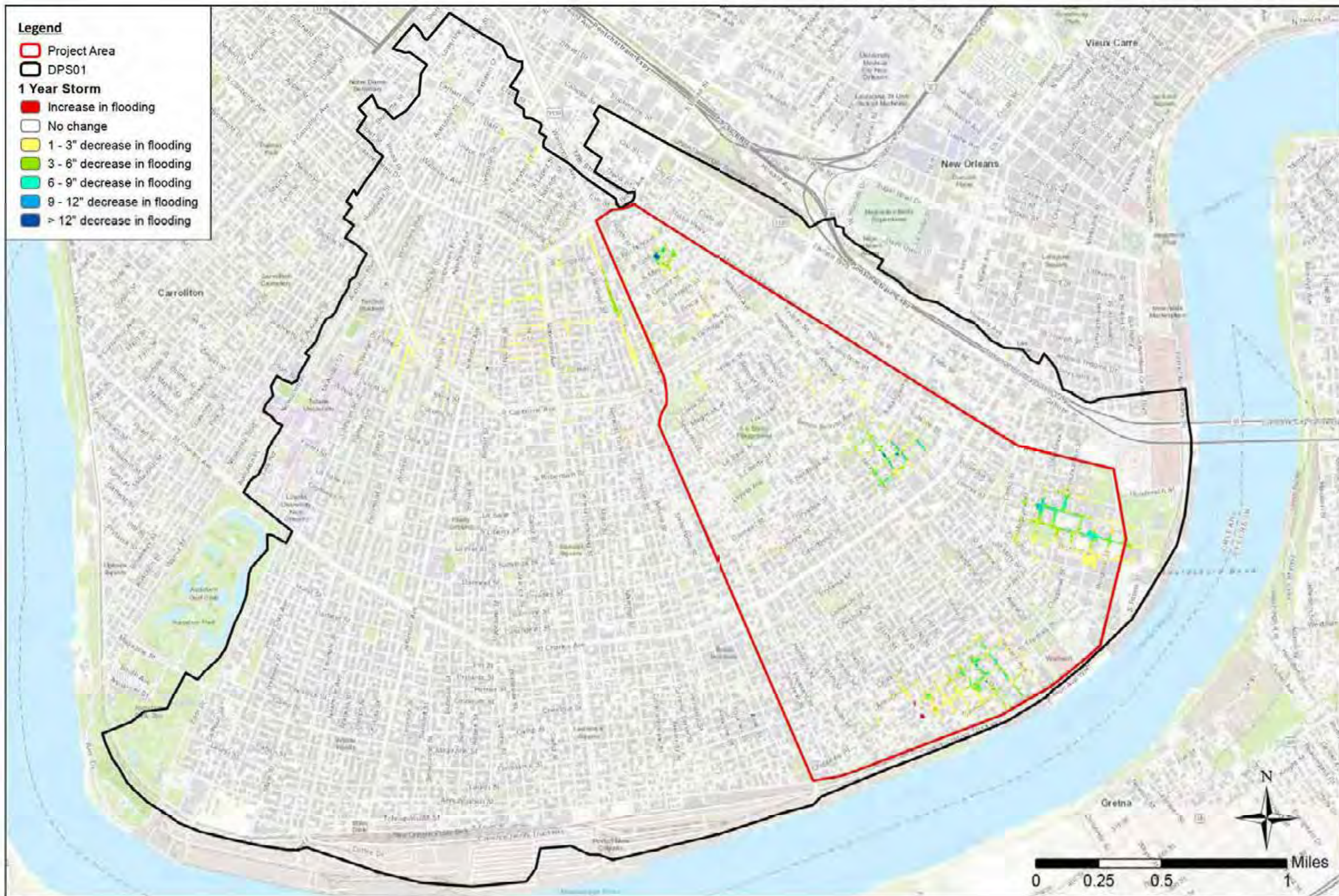


Legend

-  Project Area
-  DPS01

1 Year Storm



-  Increase in flooding
-  No change
-  1 - 3" decrease in flooding
-  3 - 6" decrease in flooding
-  6 - 9" decrease in flooding
-  9 - 12" decrease in flooding
-  > 12" decrease in flooding










**DPS 01 Watershed
Drainage Upgrades and Green Infrastructure Project
Difference in Flooding Between Existing and Proposed - 1 Year Storm**

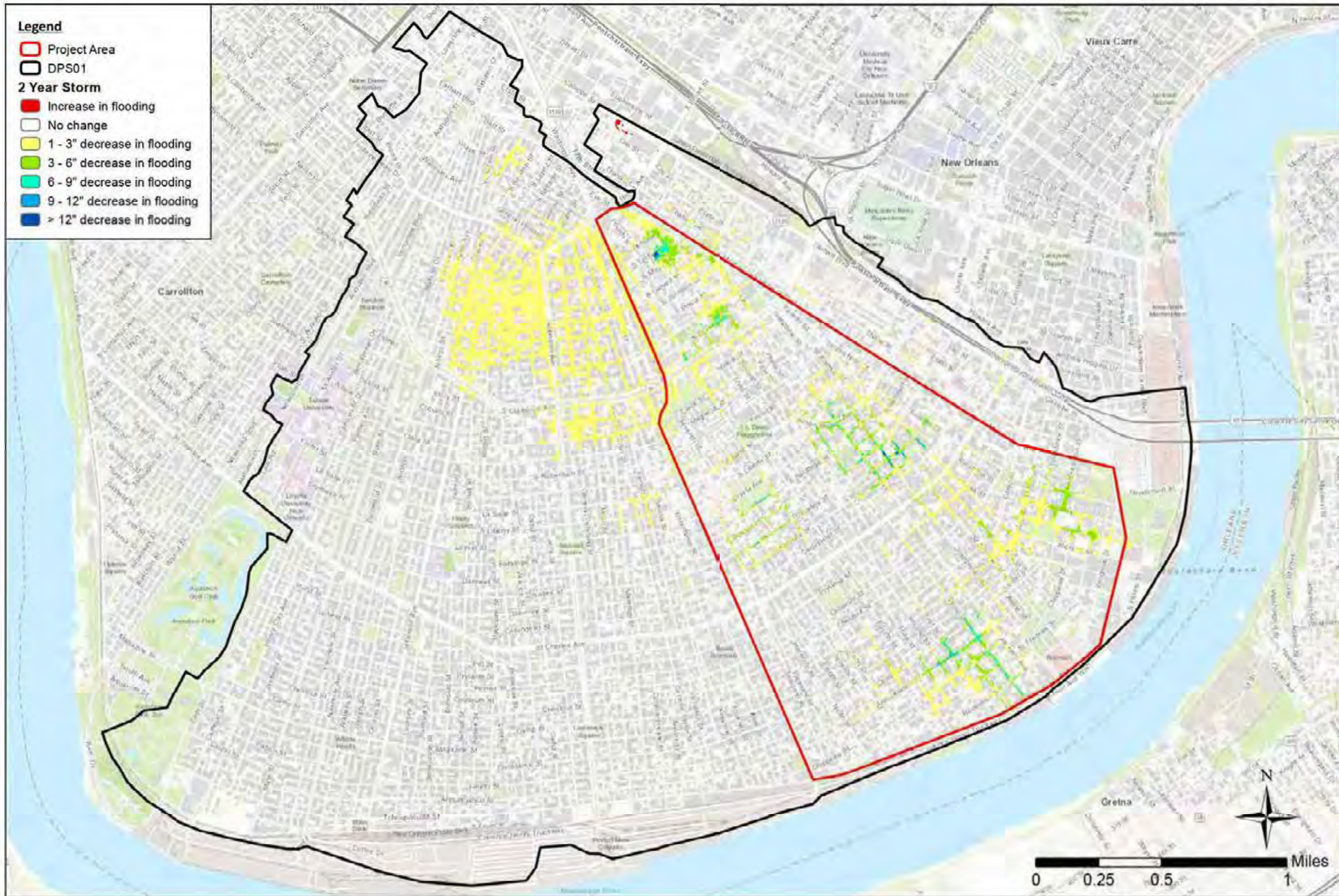


Legend

-  Project Area
-  DPS01

2 Year Storm



-  Increase in flooding
-  No change
-  1 - 3" decrease in flooding
-  3 - 6" decrease in flooding
-  6 - 9" decrease in flooding
-  9 - 12" decrease in flooding
-  > 12" decrease in flooding










**DPS 01 Watershed
Drainage Upgrades and Green Infrastructure Project
Difference in Flooding Between Existing and Proposed - 2 Year Storm**

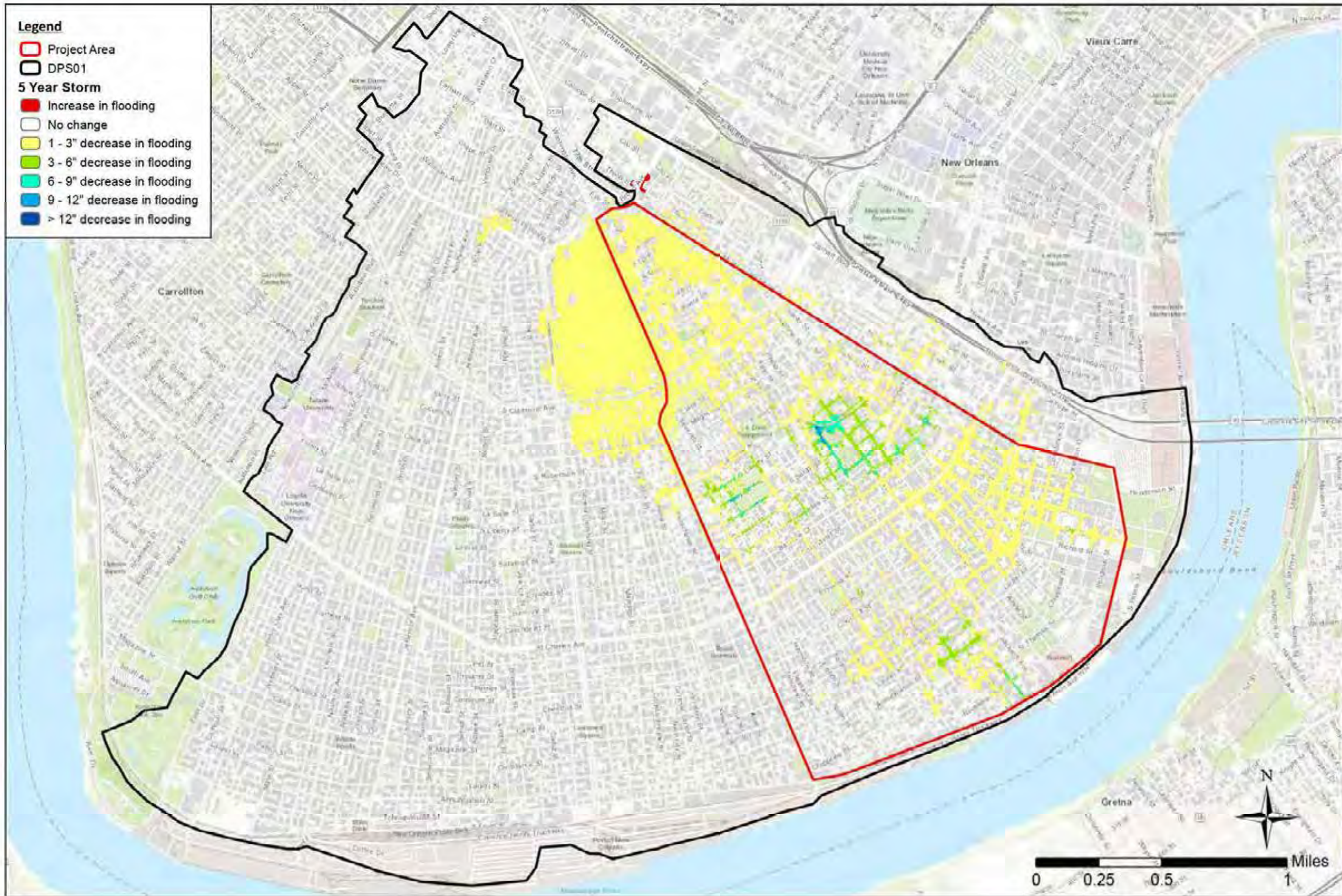


Legend

-  Project Area
-  DPS01

5 Year Storm

-  Increase in flooding
-  No change
-  1 - 3" decrease in flooding
-  3 - 6" decrease in flooding
-  6 - 9" decrease in flooding
-  9 - 12" decrease in flooding
-  > 12" decrease in flooding



**DPS 01 Watershed
Drainage Upgrades and Green Infrastructure Project
Difference in Flooding Between Existing and Proposed - 5 Year Storm**



Legend

Project Area

DPS01

10 Year Storm

Increase in flooding

No change

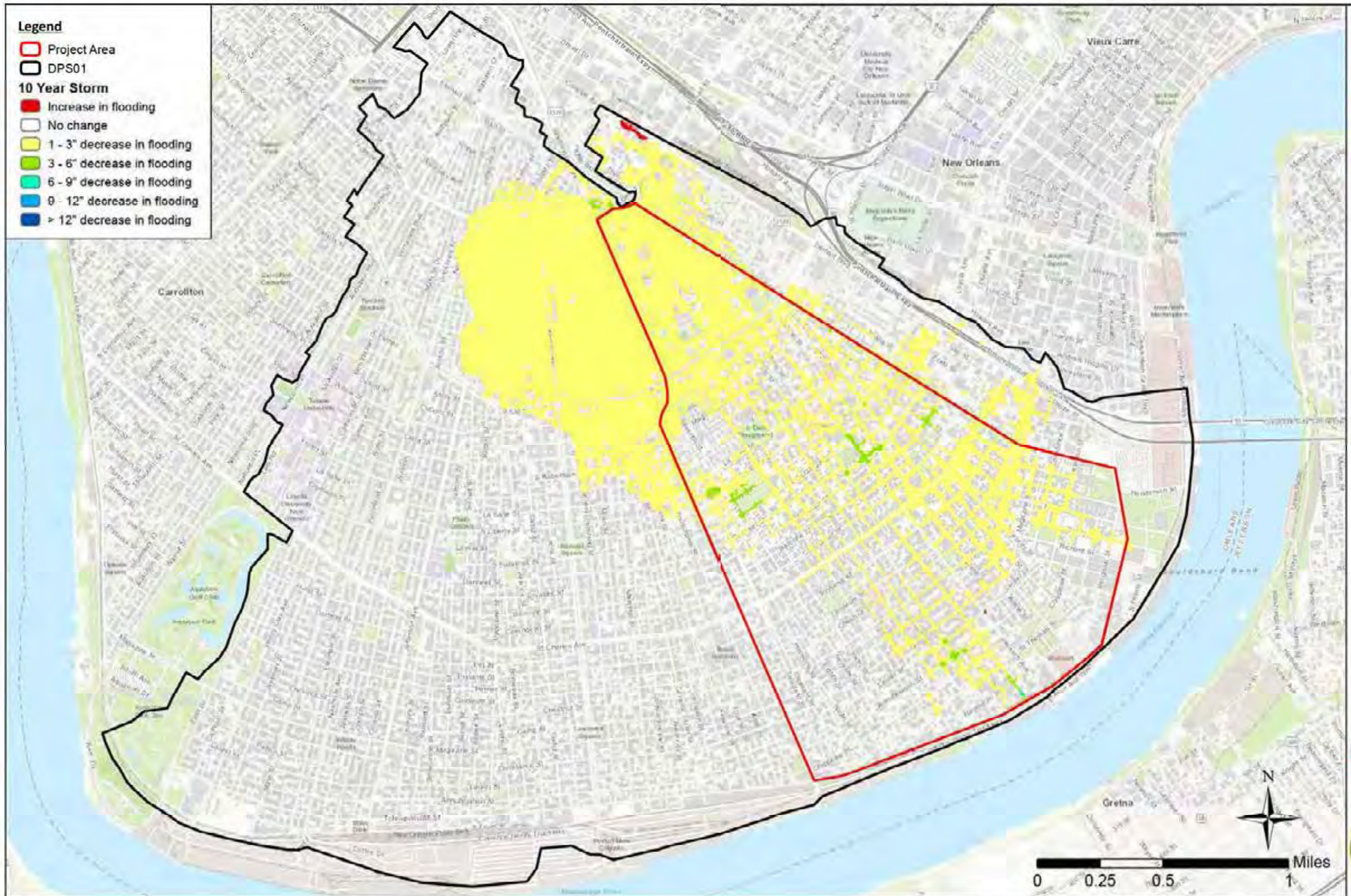
1 - 3" decrease in flooding

3 - 6" decrease in flooding

6 - 9" decrease in flooding

9 - 12" decrease in flooding

> 12" decrease in flooding



DPS 01 Watershed
Drainage Upgrades and Green Infrastructure Project
Difference in Flooding Between Existing and Proposed - 10 Year Storm





1515 Poydras Street, Suite 1000
New Orleans, Louisiana 70112
tel: 504 799-1100

August 12, 2019

Ms. Erika Boerr, MBA, PMP
Capital Projects Administration, PDU
Facilities, Infrastructure, and Community Development
1300 Perdido Street, RM 6E15
New Orleans, LA 70112

Subject: City of New Orleans
DPS 01 Watershed (Broadmoor) Drainage Upgrade and Green Infrastructure Project
Hydrologic & Hydraulic Model Changes

Dear Ms. Boerr:

A U.S. EPA Storm Water Management Model (SWMM) Hydrologic and Hydraulic (H&H) model of the Drainage Pump Station (DPS) 01 service area was first created as part of the Schematic Design of the DPS 01 Watershed (Broadmoor) Drainage Upgrades and Green Infrastructure project (Project). This Schematic Design Report, including sections detailing the H&H analysis, was submitted to the City of New Orleans in January 2016.

Since the 2016 Schematic Design Report, the Project has undergone significant revisions which were captured in the model and documented in the Project Preliminary Design Reports (PDRs) for both Phase I (parks) and Phase II (streets) submitted to the City in November 2017 and October 2018, respectively. The model was last updated to reflect Project at the 90% design, submitted to the City in February 2019.

Since the 90% design submission, the design has been refined, which resulted in an approximate 2.5% increase in total storage. The model has not been changed since the 90% design submission to include these minimally proposed positive impacts.

There are no negative impacts resulting from the changes in design between the modeled 90% design and the final design. We recommend that the model not be changed because the effort to modify the model and recalculate the insubstantial increase in the BCA is not justified by the associated benefits.

Sincerely,

Jessica L. Watts, P.E., CFM, D.WRE
Principal Water Resources Engineer
CDM Smith Inc.

cc: CDM Smith Project File (214794)



Appendix C: Agency Correspondence

Major, Steven (CTR)

From: Marissa Jimenez <Marissa.Jimenez@LA.GOV>
Sent: Friday, December 29, 2023 1:14 PM
To: FEMA-LIRO-EHP-HMA
Cc: DEQ SOV; Vivian (Aucoin) Johnson (DEQ); Kori Blich; Keith Horn; Chris Means
Subject: DEQ SOV# 231208/1010 Draft Environmental Assessment (DEA) and a Draft Finding of No Significant Impact (FONSI) for the City of New Orleans Drainage Pump Station 01, Watershed Drainage Upgrades Project (HMGP 1603-0426)

Follow Up Flag: Follow up
Flag Status: Completed

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Please select the Phish Alert Report button on the top right of your screen to report this email if it is unsolicited or suspicious in nature.

December 29, 2023

Jamie Schexnayder, CFM

Environmental Specialist/EHP/LIRO - Region 6 Mitigation Division
Department of Homeland Security-FEMA EHP-CNO DPS 01
1500 Main Street, Baton Rouge, Louisiana, 70802
fema-liro-ehp-hma@fema.dhs.gov

Draft Environmental Assessment (DEA) and a Draft Finding of No Significant Impact (FONSI) for the City of New Orleans Drainage Pump Station 01, Watershed Drainage Upgrades Project (HMGP 1603-0426)

RE: 231208/1010

FEMA Funding
Orleans Parish

Dear Ms. Schexnayder:

The Louisiana Department of Environmental Quality (LDEQ) has received your request for comments on the above referenced project.

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

- Please take any necessary steps to obtain and/or update all necessary approvals and environmental permits regarding this proposed project.

- If your project results in a discharge to waters of the state, submittal of a Louisiana Pollutant Discharge Elimination System (LPDES) application may be necessary.
- If the project results in a discharge of wastewater to an existing wastewater treatment system, that wastewater treatment system may need to modify its LPDES permit before accepting the additional wastewater.
- All precautions should be observed to control nonpoint source pollution from construction activities. LDEQ has stormwater general permits for construction areas equal to or greater than one acre. It is recommended that you contact the LDEQ Water Permits Division at (225) 219-3590 to determine if your proposed project requires a permit.
- If your project will include a sanitary wastewater treatment facility, a Sewage Sludge and Biosolids Use or Disposal Permit is required. An application form or Notice of Intent will need to be submitted if the sludge management practice includes preparing biosolids for land application or preparing sewage sludge to be hauled to a landfill. Additional information may be obtained on the LDEQ website at <https://deq.louisiana.gov/page/sewage-biosolids> or by contacting the LDEQ Water Permits Division at (225) 219-3590.
- If any of the proposed work is located in wetlands or other areas subject to the jurisdiction of the U.S. Army Corps of Engineers, you should contact the Corps directly regarding permitting issues. If a Corps permit is required, part of the application process may involve a water quality certification from LDEQ.
- All precautions should be observed to protect the groundwater of the region.
- Please be advised that water softeners generate wastewaters that may require special limitations depending on local water quality considerations. Therefore if your water system improvements include water softeners, you are advised to contact the LDEQ Water Permits to determine if special water quality-based limitations will be necessary.
- Any renovation or remodeling must comply with LAC 33:III.Chapter 28, Lead-Based Paint Activities; LAC 33:III.Chapter 27, Asbestos-Containing Materials in Schools and State Buildings (includes all training and accreditation); and LAC 33:III.5151, Emission Standard for Asbestos for any renovations or demolitions.
- If any solid or hazardous wastes, or soils and/or groundwater contaminated with hazardous constituents are encountered during the project, notification to LDEQ's Single-Point-of-Contact (SPOC) at (225) 219-3640 is required. Additionally, precautions should be taken to protect workers from these hazardous constituents.
- **The proposed project is located within the LDEQ defined water unit LA041302_00, which drains to water unit LA041001_00 (Lake Pontchartrain). According to the LDEQ 2022 Integrated Report, these units contain water quality impairments for bacteria. Control of nonpoint source pollution from construction activities should followed as described above, as disturbance and sedimentation can worsen water quality.**
- **Management of soils which may have contaminant concentrations that exceed the Limiting Screening Option Standards established by the LDEQ Risk Evaluation/Corrective Action Program (RECAP) Regulation shall be done in accordance with previous LDEQ direction. Alternately, these materials may be considered a waste and disposed of at a permitted facility, or might be managed as part of a Solid Waste Beneficial Use or Soil Reuse Plan in accordance with LAC 33:VII.Chapter 11. Alternately, a site-specific RECAP Evaluation might be conducted and submitted to the LDEQ.**
- ***A file review indicates the following AI Numbers are located in the vicinity of your project in Orleans Parish, LA, and have active underground storage tanks (USTs) on the properties:***

AI No. 68627; Friends Food Mart & Deli; 2727 S. Claiborne Ave

A file review indicates the following AI Numbers are located in the vicinity of your project in Orleans Parish, LA and at one time contained USTs on the properties that have been removed from the LDEQ database:

AI No. 10247; New Orleans Limousine Service; 3119 Jackson Ave

AI No. 77511; Julian J Loeb; 2701 S Claiborne Ave

AI No. 79540; Ebenezer Baptist Church; 2415 S Claiborne Ave

AI No. 66973; LaSalle Exxon; 2532 LaSalle St

AI No. 79170; New Zion Baptist Church; 2319 Third St

AI No. 159965; Second Line Stages Redevelopment; 1600 Annunciation St

AI No. 75068; New Orleans City-of-Seventh St Transfer Station; 2100 Seventh St

Confirmed releases have been reported at AI Numbers 10247, 68627, and 159965 and have received No Further Action-At This Time (NFA-ATT) designation by the LDEQ.

If the project will involve the disturbance of any soils in former UST areas which may exceed the Screening Option Standards established by the LDEQ Risk Evaluation/Corrective Action Program (RECAP) Regulation, these materials may be considered a waste and disposed of at a permitted facility, or might be managed as part of a Solid Waste Beneficial Use or Soil Reuse Plan in accordance with LAC 33:VII.Chapter 11. Alternately, a site-specific RECAP Evaluation might be conducted and submitted to the LDEQ.

If any underground storage tanks are encountered during the project, they must be in compliance with the regulations found in LAC 33:XI of the Environmental Regulatory Code. If any contaminated soil or groundwater is encountered, the findings should be reported to LDEQ.

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

Please send all Solicitation of Views (SOVs) requests and questions to SOVs@la.gov.

Sincerely,

Marissa Jimenez

Environmental Scientist Manager

LDEQ Office of the Secretary

Outreach and Small Business Assistance

225-219-3963

JOHN BEL EDWARDS
GOVERNOR



ROBERT E. SHADOIN
SECRETARY

PO BOX 98000 | BATON ROUGE LA | 70898

Date December 14, 2023
Name Jamie Schexnayder
Company FEMA
Street Address
City, State Zip
Project City of New Orleans Drainage Pump Station 01, Watershed Drainage
Upgrades Project (HMGP 1603-0426)
Project ID
Invoice Number 23121407

Personnel of the Louisiana Wildlife Diversity Program (WDP) 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 wildlife refuges or wildlife management areas are known to occur at the specified site within Louisiana's boundaries.

The Wildlife Diversity Program (WDP) has compiled data on rare, endangered, or otherwise significant plant and animal species, plant communities, and other natural features throughout the state of Louisiana. WDP 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 WDP 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. WDP 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. WDP requires that this office be acknowledged in all reports as the source of all data provided here. If at any time WDP tracked species are encountered within the project area, please contact the WDP Data Manager at 225-763-3554. If you have any questions, or need additional information, please call 337-735-8734.

Sincerely,

for *Carolyn Michon*

Digitally signed by Carolyn Michon

Date: 2023.12.14 14:45:57 -06'00'

Nicole Lorenz, Program Manager
Wildlife Diversity Program

From: [Cragin Knox](#)
To: linda.hardy@la.gov; abass@wlf.la.gov; Karen.L.Clement@usace.army.mil; amy_trahan@fws.gov; Jansky.Michael@epa.gov; maria.reid@la.gov
Cc: [Lazaras, Gail](#); [Pitts, Melanie](#); [Martinez, Amber](#)
Subject: Request for Solicitation of Views (SOV) for HM-1603-426
Date: Monday, May 01, 2017 3:22:13 PM
Attachments: [image001.png](#)
[project_24x24_all_projects.pdf](#)
[POC SOV 04 28 2017.pdf](#)
[2 1 Stormwater Lots and Parks.pdf](#)
[2 2 Curb Extensions Street Basins Points.pdf](#)
[2 3 Pervious Intersections Parking Sidewalks.pdf](#)
[2 4 Road Reconfigurations.pdf](#)
[2 5 Pipe Upgrades.pdf](#)

U.S. Department of Homeland
Security
Federal Emergency Management

Agency

FEMA-DR 1603/1607 LA
Louisiana Recovery Office
1500 Main St., Baton Rouge, LA

70802



May 3, 2017

MEMORANDUM TO: See Distribution List

SUBJECT: Scoping Notification/Solicitation of Views
Broadmoor Drainage Upgrades and Green Infrastructure
Project, HMPG# 1603-426, FEMA-DR-1603-Project# 366

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. FEMA's Hazard Mitigation Program provides funds to states and local governments to implement long-term hazard mitigation measures after a major disaster declaration. FEMA is considering providing Hazard Mitigation Grant Program funding under disaster assistance for Hurricanes Katrina and Rita (FEMA-1603/1607-DR-LA) for the Broadmoor Drainage Project in New Orleans, Louisiana.

The City of New Orleans (CNO) has requested grant funding to improve storm water drainage and mitigate hazards and damages from local flooding in the Broadmoor neighborhood area. The Study Area is approximately 1,546 acres, which is generally

bounded by Martin Luther King, Jr. Boulevard and Melpomene Street to the northeast, South Broad Street to the northwest, Louisiana Avenue and Toledano Street to the southwest, and Tchoupitoulas Street to the southeast, along the Mississippi River (see Figure 1).

Various improvements are proposed and consist of installing new and larger drainage pipes, pervious surfaces, street basins, street-side bioswales, and retention/detention basins, as well as the use of CNO-owned/controlled vacant lots to intercept and store stormwater prior to entering the subsurface drainage system. Other green infrastructure improvements could also be implemented. These improvements are intended to mitigate damages that are associated with 10-year flood events. The general locations of these various improvements are depicted on Figure 1 and in the attached spreadsheets.

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

Please respond within thirty (30) calendar days of the date of this scoping notification. If our office receives no comments at the close of this period, we will assume that your agency does not object to the project as proposed.

Comments may be faxed to 225-761-7088, emailed to cknox@gsrcorp.com or mailed to the attention of Mr. Cragin Knox, Project Manager, Gulf South Research Corporation, 8081 Innovation Park Drive, Baton Rouge, Louisiana 70820. For questions regarding this matter, please contact Cragin Knox at (225) 757-8088.

Cragin Knox

Gulf South Research Corporation
Phone: 225.759.8088
Mobile: 601.506.0908



www.gsrcorp.com

From: [Noel Ardoin](#)
To: [Cragin Knox](#)
Cc: [Darlene LaMarca](#); [Maria Reid](#)
Subject: FW: Request for Solicitation of Views (SOV) for HM-1603-426
Date: Tuesday, May 02, 2017 3:29:08 PM
Attachments: [image001.png](#)
[image002.jpg](#)
[project_24x24_all_projects.pdf](#)
[POC SOV 04 28 2017.pdf](#)
[2 1 Stormwater Lots and Parks.pdf](#)
[2 2 Curb Extensions Street Basins Points.pdf](#)
[2 3 Pervious Intersections Parking Sidewalks.pdf](#)
[2 4 Road Reconfigurations.pdf](#)
[2 5 Pipe Upgrades.pdf](#)

Mr. Knox,

This is in regards to your email below and its attachments, requesting comments on the proposed drainage improvements within the City of New Orleans, in Orleans Parish. If these improvements require the use of state highway rights of ways, you should contact Ms. Darlene Lamarca in our District 02 Office in Bridge City to apply for the appropriate permits. She can be reached by phone at (504) 437-3130 or by mail at P.O. Box 9180, Bridge City, LA 70096-9180. If you need additional information, please contact my office at (225) 242-4502.

Noel Ardoin
Environmental Engineer Administrator
LA Dept. of Transportation & Development
(225) 242-4502 Office
noel.ardoin@la.gov

From: Maria Reid
Sent: Tuesday, May 02, 2017 8:00 AM
To: Noel Ardoin
Subject: FW: Request for Solicitation of Views (SOV) for HM-1603-426

Noel,
I received this SOV yesterday.

Maria Bernard Reid
Louisiana DOTD
225-242-4506

From: Cragin Knox [<mailto:CKnox@gsrcorp.com>]
Sent: Monday, May 01, 2017 3:21 PM
To: Linda (Brown) Hardy; Amity Bass; Karen.L.Clement@usace.army.mil; amy_trahan@fws.gov; Jansky.Michael@epa.gov; Maria Reid
Cc: Gail Lazaras (Gail.Lazaras@fema.dhs.gov); Melanie Pitts (melanie.pitts@fema.dhs.gov); Martinez,

Amber

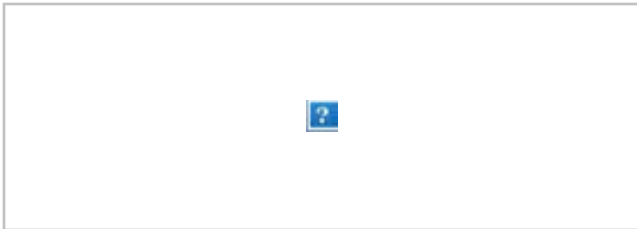
Subject: Request for Solicitation of Views (SOV) for HM-1603-426

U.S. Department of Homeland
Security
Federal Emergency Management

Agency

FEMA-DR 1603/1607 LA
Louisiana Recovery Office
1500 Main St., Baton Rouge, LA

70802



May 3, 2017

MEMORANDUM TO: See Distribution List

SUBJECT: Scoping Notification/Solicitation of Views
Broadmoor Drainage Upgrades and Green Infrastructure
Project, HMPG# 1603-426, FEMA-DR-1603-Project# 366

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. FEMA's Hazard Mitigation Program provides funds to states and local governments to implement long-term hazard mitigation measures after a major disaster declaration. FEMA is considering providing Hazard Mitigation Grant Program funding under disaster assistance for Hurricanes Katrina and Rita (FEMA-1603/1607-DR-LA) for the Broadmoor Drainage Project in New Orleans, Louisiana.

The City of New Orleans (CNO) has requested grant funding to improve storm water drainage and mitigate hazards and damages from local flooding in the Broadmoor neighborhood area. The Study Area is approximately 1,546 acres, which is generally bounded by Martin Luther King, Jr. Boulevard and Melpomene Street to the northeast, South Broad Street to the northwest, Louisiana Avenue and Toledano Street to the southwest, and Tchoupitoulas Street to the southeast, along the Mississippi River (see Figure 1).

Various improvements are proposed and consist of installing new and larger drainage pipes, pervious surfaces, street basins, street-side bioswales, and retention/detention basins, as well as the use of CNO-owned/controlled vacant lots to intercept and store

stormwater prior to entering the subsurface drainage system. Other green infrastructure improvements could also be implemented. These improvements are intended to mitigate damages that are associated with 10-year flood events. The general locations of these various improvements are depicted on Figure 1 and in the attached spreadsheets.

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

Please respond within thirty (30) calendar days of the date of this scoping notification. If our office receives no comments at the close of this period, we will assume that your agency does not object to the project as proposed.

Comments may be faxed to 225-761-7088, emailed to cknox@gsrcorp.com or mailed to the attention of Mr. Cragin Knox, Project Manager, Gulf South Research Corporation, 8081 Innovation Park Drive, Baton Rouge, Louisiana 70820. For questions regarding this matter, please contact Cragin Knox at (225) 757-8088.

Cragin Knox

Gulf South Research Corporation

Phone: 225.759.8088

Mobile: 601.506.0908



www.gsrcorp.com

From: [Chauvin, Joseph](#)
To: ["Jennifer E. Ruley"](#)
Cc: [Martinez, Amber](#); [Stoskopf, Sharon](#); [Lain, Emanuel](#)
Subject: 1603-426 Broadmoor Drainage Upgrades - LDEQ EDMS Sites located within the project area perimeter
Date: Friday, June 9, 2017 1:13:00 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[project_24x24_all_projects.pdf](#)
[POC SOV 04 28 2017.pdf](#)
[2_1_Stormwater_Ints_and_Parks.pdf](#)
[2_2_Curb_Extensions_Street_Basins_Points.pdf](#)
[2_3_Pervious_Intersections_Parking_Sidewalks.pdf](#)
[2_4_Road_Reconfigurations.pdf](#)
[2_5_Pipe_Improvements.pdf](#)

Jennifer,

FYI...just received some information from LDEQ's Remediation Division in response to our Broadmoor SOV letter (see below).

Essentially, the email below identifies sites located within the Broadmoor project area perimeter (i.e. outline) which contain records on LDEQ's EDMS database.

Per Mr. Horn's email, *"If the project will involve any of the sites listed above [i.e. in the table listed below], or if you have any specific questions or concerns regarding the RECAP Regulation, please contact: Keith Horn, Senior Environmental Scientist, LDEQ Remediation Division, (225) 219-3717, or at Keith.Horn@la.gov."*

We are still waiting on LDEQ's – as well as other regulatory agencies- official response to our SOV letter. However, I thought it would be worthwhile to provide you this info now as a heads up. Please let me know if you have any questions or concerns, or we can discuss when we meet next week if you prefer.

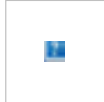
Thanks,
Joey

Joseph Chauvin
 Environmental and Historic Preservation Advisor – National IMAT East 2
 (Currently deployed to support FEMA-1603-DR-LA)
 (202)770-8905
Joseph.chauvin@fema.dhs.gov

From: Keith Horn [<mailto:Keith.Horn@LA.GOV>]
Sent: Friday, June 09, 2017 11:31 AM
To: Chauvin, Joseph <Joseph.Chauvin@fema.dhs.gov>
Subject: FW: 170526/0630 Broadmoor Drainage Upgrades

FYI, this is what we sent to Linda.

Keith Horn
Senior Environmental Scientist
LDEQ Remediation Division
Desk (225) 219-3717
Facsimile (225) 219-3398



From: Keith Horn
Sent: Friday, June 09, 2017 11:28 AM
To: Linda (Brown) Hardy
Cc: Percy Harris; Edwin Akujobi; Alan Karr; Dana Shepherd; Michael Miller (DEQ)
Subject: FW: 170526/0630 Broadmoor Drainage Upgrades

Linda:

The Remediation Division has completed a review of SOV 170526/0630 Broadmoor Drainage Upgrades. We have a number of specific comments and concerns with the SOV as follows:

The LDEQ Remediation Division has identified the sites listed below that may be within the outlines of the project area. These sites vary in scope and issues, and we are not sure if they will in fact present any concerns for your project, but we wanted you to be aware of them. Specific information on each can be obtained in the LDEQ Electronic Data Management System (EDMS).

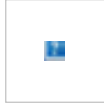
AI	Site Name	Type	Date	Zip Code	Address
204748	Release Site	Confirmed	3/3/2017	70113	2200 Oretha Castle Haley Blvd
178008	Burke Playground	Solid Waste	8/22/2011	70113	2524 Annunciation St
85660	Gasper Schiro Property	VRP	5/6/2005	70115	1476 Magazine St
44056	Saratoga St Incinerator	Confirmed VRP	2/4/1997	70115	2943 S Saratoga St

178007	Van McMurray Playground	Solid Waste	8/22/2011	70115	2000 Philip St
178014	Annunciation Playground	Solid Waste	8/22/2011	70130	800 Race St
137693	Crescent City Construction Co	Solid Waste	3/8/2012	70113	2502 Magnolia St
174913	Renewal Homes II LLC - Private Residence	Solid Waste	5/10/2011	70115	2504-06 S Galvez St
174912	Renewal Homes II LLC - Private Residence	Solid Waste	5/10/2011	70115	3223-25 Dryades St
174256	Former Auto Springs Service	Solid Waste	3/9/2011	70115	2850 Magazine St
98530	Greater St Stephen Manor	Solid Waste	4/12/2013	70115	2101 Louisiana Ave
185326	Magnolia Marketplace LLC - Magnolia Marketplace	Solid Waste	11/9/2015	70125	S Claiborne Ave & Toledano St
81484	Square 413 Property	Solid Waste	6/8/2007	70125	Bounded By Claiborne & Josephine & Jackson & Derbigny
81439	Save-A-Lot #4793	Solid Waste	11/24/2003	70125	2841 S Claiborne Ave, Ste D
83201	Entergy New Orleans Inc - Market Street Substation	Confirmed	1/9/2002	70130	1664 Tchoupitoulas St
140760	Taylor Playground	Solid Waste			2600 Roman St.
2954	Sterling Retail Center	Solid Waste	6/22/2009	70130	1667 Tchoupitoulas St

If the project will involve the excavation of any soils which may exceed the Non-Industrial (Residential) or Soil Protective of Groundwater Screening Option Standards established by the LDEQ Risk Evaluation/Corrective Action Program (RECAP) Regulation, these materials may be considered a waste and disposed of at a permitted facility, or might be managed as part of a Solid Waste Beneficial Use or Soil Reuse in accordance with LAC 33:VII.Chapter 11. Alternately, a site-specific RECAP Evaluation might be conducted.

If the project will involve any of the sites listed above, or if you have and specific questions or concerns regarding the RECAP Regulation, please contact: Keith Horn, Senior Environmental Scientist, LDEQ Remediation Division, (225) 219-3717, or at Keith.Horn@la.gov.

Keith Horn
Senior Environmental Scientist
LDEQ Remediation Division
Desk (225) 219-3717
Facsimile (225) 219-3398

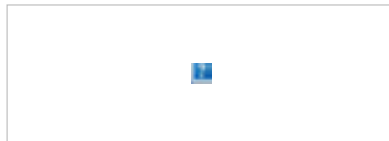


From: Linda (Brown) Hardy
Sent: Friday, May 26, 2017 9:08 AM
To: Al Hindrichs; Carla Morin; Keith Horn; Yasoob Zia
Subject: 170526/0630 Broadmoor Drainage Upgrades

170526/0630 Broadmoor Drainage Upgrades

From: Cragin Knox [<mailto:Cknox@gsrcorp.com>]
Sent: Monday, May 01, 2017 3:21 PM
To: Linda (Brown) Hardy; Amity Bass; Karen.L.Clement@usace.army.mil; amy_trahan@fws.gov; Jansky.Michael@epa.gov; Maria Reid
Cc: Gail Lazaras (Gail.Lazaras@fema.dhs.gov); Melanie Pitts (melanie.pitts@fema.dhs.gov); Martinez, Amber
Subject: Request for Solicitation of Views (SOV) for HM-1603-426

U.S. Department of Homeland Security
Federal Emergency Management Agency
FEMA-DR 1603/1607 LA
Louisiana Recovery Office
1500 Main St., Baton Rouge, LA 70802



May 3, 2017

MEMORANDUM TO: See Distribution List

SUBJECT: Scoping Notification/Solicitation of Views
Broadmoor Drainage Upgrades and Green Infrastructure Project, HMPG# 1603-426, FEMA-DR-1603-Project# 366

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. FEMA's Hazard Mitigation Program provides funds to states and local governments to implement long-term hazard mitigation measures after a major disaster declaration. FEMA is considering providing Hazard Mitigation Grant Program funding under disaster assistance for Hurricanes Katrina and Rita (FEMA-1603/1607-DR-LA) for the Broadmoor Drainage Project in New Orleans, Louisiana.

The City of New Orleans (CNO) has requested grant funding to improve storm water drainage and mitigate hazards and damages from local flooding in the Broadmoor neighborhood area. The Study Area is approximately 1,546 acres, which is generally bounded by Martin Luther King, Jr. Boulevard and Melpomene Street to the northeast, South Broad Street to the northwest, Louisiana Avenue and Toledano Street to the southwest, and Tchoupitoulas Street to the southeast, along the Mississippi River (see Figure 1).

Various improvements are proposed and consist of installing new and larger drainage pipes, pervious surfaces, street basins, street-side bioswales, and retention/detention basins, as well as the use of CNO-owned/controlled vacant lots to intercept and store stormwater prior to entering the subsurface drainage system. Other green infrastructure improvements could also be implemented. These improvements are intended to mitigate damages that are associated with 10-year flood events. The general locations of these various improvements are depicted on Figure 1 and in the attached spreadsheets.

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

Please respond within thirty (30) calendar days of the date of this scoping notification. If our office receives no comments at the close of this period, we will assume that your agency does not object to the project as proposed.

Comments may be faxed to 225-761-7088, emailed to cknox@gsrcorp.com or mailed to the attention of Mr. Cragin Knox, Project Manager, Gulf South Research Corporation, 8081 Innovation Park Drive, Baton Rouge, Louisiana 70820. For questions regarding this matter, please contact Cragin Knox at (225) 757-8088.

Cragin Knox

Gulf South Research Corporation
Phone: 225.759.8088
Mobile: 601.506.0908



www.gsrcorp.com



JOHN BEL EDWARDS
GOVERNOR

State of Louisiana
DEPARTMENT OF WILDLIFE AND FISHERIES
OFFICE OF WILDLIFE

LICK PORTOUSE
SECRETARY

Date May 31, 2017

Name Cragin Knox
Company FEMA
Street Address 1500 Main St.
City, State, Zip Baton Rouge, LA

Project Broadmoor Drainage Upgrades & Green Infrastructure Project
HMPG# 1603-426
FEMA-DR-1603-Project# 366


Project ID

Invoice Number 17053116

Personnel 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, wildlife management areas, or scenic streams are known to occur 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,


Carey Perry, Coordinator
Natural Heritage Program



JOHN BEL EDWARDS
GOVERNOR

State of Louisiana
DEPARTMENT OF WILDLIFE AND FISHERIES
OFFICE OF WILDLIFE

JACK MONTUCET
SECRETARY

INVOICE

RETAIN THIS COPY FOR YOUR RECORDS

Date	May 31, 2017
Invoice Number	17053116
Project	Broadmoor Drainage Upgrades & Green Infrastructure Project HMPG# 1603-426 FEMA-DR-1603-Project# 366
Name	Cragin Knox
Company	FEMA
Street Address	1500 Main St.
City, State, Zip	Baton Rouge, LA
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.



JOHN BEL EDWARDS
GOVERNOR

State of Louisiana
DEPARTMENT OF WILDLIFE AND FISHERIES
OFFICE OF WILDLIFE

JACK MONTOUCKET
SECRETARY

INVOICE

RETURN THIS COPY OF INVOICE WITH PAYMENT

Date May 31, 2017

Invoice Number 17053116

Project Broadmoor Drainage Upgrades & Green Infrastructure Project
HMPG# 1603-426
FEMA-DR-1603-Project# 366

Name Cragin Knox

Company FEMA

Street Address 1500 Main St.

City, State, Zip Baton Rouge, LA

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.



DEPARTMENT OF THE ARMY
CORPS OF ENGINEERS, NEW ORLEANS DISTRICT
7400 LEAKE AVENUE
NEW ORLEANS, LOUISIANA 70118

REPLY TO
ATTENTION OF

JUL 18 2017

Operations Division
Operations Manager,
Completed Works

Mr. Cragin Knox
Federal Emergency Management
Agency
Louisiana Recovery Office
1500 Main Street
Baton Rouge, Louisiana 70802

Dear Mr. Knox:

This is in response to the Solicitation of Views request on behalf of the City of New Orleans dated May 1, 2017, concerning the Storm Water Drainage Improvements in Broadmoor Neighborhood, 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.

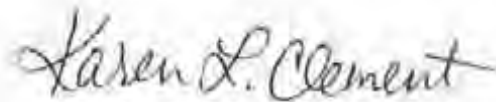
We have reviewed your project and determined that a Department of the Army permit under Section 404 of the Clean Water Act will not be required. Any changes or modifications to the proposed project will require a revised determination.

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. Brad Guarisco of our Regulatory Branch by telephone at (504) 862-2274, or by e-mail at Brad.A.Guarisco@usace.army.mil for questions concerning wetlands determinations or need for on-site evaluations. Questions concerning regulatory permit requirements may be addressed to Mr. Michael Farabee by telephone at (504) 862-2292 or by email at Michael.V.Farabee@usace.army.mil.

Future correspondence concerning this matter should reference our account number MVN-2017-00804-SY. This will allow us to more easily locate records of previous correspondence, and thus provide a quicker response.

Sincerely,

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

Karen L. Clement
Solicitation of Views Manager



July 20, 2017

Cragin Knox
Project Manager
Gulf South Research Corporation
8081 Innovation Park Drive
Baton Rouge, LA 70820

RE: Solicitation of Views
Broadmoor Drainage Upgrades and Green Infrastructure Project
HMPG# 1603-426, FEMA-DR-1603-Project # 366

Dear Mr. Knox:

I have reviewed the above referenced project for potential requirements of the Farmland Protection Policy Act (FPPA) and potential impact to Natural Resource Conservation Service projects in the immediate vicinity.

Projects are subject to FPPA requirements if they may irreversibly convert farmland (directly or indirectly) to nonagricultural use and are completed by a federal agency or with assistance from a federal agency. For the purpose of FPPA, farmland includes prime farmland, unique farmland, and land of statewide or local importance. Farmland subject to FPPA requirements can be forest land, pastureland, cropland, or other land, but not water or urban built-up land.

The project map and narrative submitted with your request indicates that the proposed construction area is in an urban area and therefore is exempt from the rules and regulations of the Farmland Protection Policy Act (FPPA)—Subtitle I of Title XV, Section 1539-1549. Furthermore, we do not predict impacts to NRCS work in the vicinity.

For specific information about the soils found in the project area, please visit our Web Soil Survey at the following location: <http://websoilsurvey.nrcs.usda.gov/>

Please direct all future correspondence to me at the address shown below.

Respectfully,

Acting For:
Kevin D. Norton
State Conservationist

Attachment



Natural Resources Conservation Service
State Office
3737 Government Street
Alexandria, Louisiana 71302
Voice: (318) 473-7751 Fax: (844) 325-6947

Helping People Help the Land



Trahan, Amy <amy_trahan@fws.gov>

Request for Solicitation of Views (SOV) for HM-1603-426

1 message

Cragin Knox <CKnox@gsrcorp.com>

Mon, May 1, 2017 at 3:20 PM

To: "linda.hardy@la.gov" <linda.hardy@la.gov>, "abass@wlf.la.gov" <abass@wlf.la.gov>, "Karen.L.Clement@usace.army.mil" <Karen.L.Clement@usace.army.mil>, "amy_trahan@fws.gov" <amy_trahan@fws.gov>, "Jansky.Michael@epa.gov" <Jansky.Michael@epa.gov>, "maria.reid@la.gov" <maria.reid@la.gov>
Cc: "Gail Lazaras (Gail.Lazaras@fema.dhs.gov)" <Gail.Lazaras@fema.dhs.gov>, "Melanie Pitts (melanie.pitts@fema.dhs.gov)" <melanie.pitts@fema.dhs.gov>, "Martinez, Amber" <Amber.Martinez2@fema.dhs.gov>

U.S. Department of Homeland Security
Federal Emergency Management Agency
FEMA-DR 1603/1607 LA
Louisiana Recovery Office
1500 Main St., Baton Rouge, LA 70802



FEMA

May 3, 2017

[Handwritten signature and date 5/25/17 over a red stamp]

MEMORANDUM TO: See Distribution List

SUBJECT: Scoping Notification/Solicitation of Views
Broadmoor Drainage Upgrades and Green Infrastructure Project, HMPG# 1603-426,
FEMA-DR-1603-Project# 366

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. FEMA's Hazard Mitigation Program provides funds to states and local governments to implement long-term hazard mitigation measures after a major disaster declaration. FEMA is considering providing Hazard Mitigation Grant Program funding under disaster assistance for Hurricanes Katrina and Rita (FEMA-1603/1607-DR-LA) for the Broadmoor Drainage Project in New Orleans, Louisiana.

The City of New Orleans (CNO) has requested grant funding to improve storm water drainage and mitigate hazards and damages from local flooding in the Broadmoor neighborhood area. The Study Area is approximately 1,546 acres, which is generally bounded by Martin Luther King, Jr. Boulevard and Melpomene Street to the northeast, South Broad Street to the northwest, Louisiana Avenue and Toledano Street to the southwest, and Tchoupitoulas Street to the southeast, along the Mississippi River (see Figure 1).

Various improvements are proposed and consist of installing new and larger drainage pipes, pervious surfaces, street basins, street-side bioswales, and retention/detention basins, as well as the use of CNO-owned/controlled vacant lots to intercept and store stormwater prior to entering the subsurface drainage system. Other green infrastructure improvements could also be implemented. These improvements are intended to mitigate damages that are associated with 10-year flood events. The general locations of these various improvements are depicted on Figure 1 and in the attached spreadsheets.

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

Please respond within thirty (30) calendar days of the date of this scoping notification. If our office receives no comments at the close of this period, we will assume that your agency does not object to the project as proposed.

Comments may be faxed to 225-761-7088, emailed to cknox@gsrcorp.com or mailed to the attention of Mr. Cragin Knox, Project Manager, Gulf South Research Corporation, 8081 Innovation Park Drive, Baton Rouge, Louisiana 70820. For questions regarding this matter, please contact Cragin Knox at (225) 757-8088.

Cragin Knox

Gulf South Research Corporation

Phone: 225.759.8088

Mobile: 601.506.0908



www.gsrcorp.com

The letter that immediately follows this page, titled Final Abbreviated Consultation Process Letter sent from FEMA to State Historic Preservation Officer Kristen Sanders on December 9th, 2022, includes redacted sections on pages 58 through 61, a redacted table on page 62, and redacted pages on page 72 and pages 89 through 93.



December 9, 2022

Kristen Sanders
State Historic Preservation Officer
Department of Culture, Recreation & Tourism
1051 North Third Street
Baton Rouge, LA 70802

RE: Final Abbreviated Consultation Process Letter

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

City of New Orleans, DPS 01 Drainage Upgrades and Green Infrastructure Project (HMGP Project 1603-426), New Orleans, Orleans Parish, LA

Determination: Adverse Effect to Historic Properties

Dear Ms. Sanders:

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 FEMA-1603-DR-LA, dated August 29, 2005, as amended. FEMA is conducting Section 106 review and consultation for the above referenced properties in accordance with the Programmatic Agreement between FEMA, the Louisiana State Historic Preservation Officer (SHPO), and the Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP) dated December 21, 2016, as amended (2016 Statewide PA).

FEMA proposes to provide federal funding through the Hazard Mitigation Grant Program to the City of New Orleans (Subrecipient) for the Drainage Pump Station (DPS 01) Drainage Upgrades and Green Infrastructure Project (Undertaking) in New Orleans.

Background

The Sub-recipient submitted the first phase of design for this project in January 2016. Since then, the proposed project has undergone significant changes, namely a reduction in scope. On February 9, 2017, FEMA notified SHPO, Tribes, and interested parties by email of its intent to fund the Broadmoor Drainage Upgrades and Green Infrastructure Program. FEMA also notified the National Park Service (NPS) because the Undertaking had the potential to affect the Garden District and St. Charles Streetcar National Historic Landmarks. NPS did not respond. On April 26, 2017, FEMA notified the same parties of its intent to prepare an Environmental Assessment to meet the requirements of the National Environmental Policy Act. The email notification described the scoping process, listed two public meeting dates, and solicited input and comments by email, phone, fax, or mail. On June 5, 2017, FEMA invited SHPO to a design review meeting hosted by the City of New Orleans to discuss historic streetscape concerns. The Historic District Landmark Commission was also invited and commented on the proposed project during the meeting.

In addition, FEMA has consulted with SHPO and Tribes on identification and evaluation efforts (details provided below). On July 5, 2018 and August 8, 2018, FEMA consulted with SHPO and Tribes, respectively, regarding the evaluation of A.L. Davis Park for the National Register of Historic Places. SHPO responded on August 8, 2018 and the Choctaw Nation of Oklahoma deferred to other parties on September 11, 2018. On October 18-19, 2018, FEMA consulted with SHPO and Tribes on archaeological investigations at three parks and one stormwater lot. SHPO concurred with FEMA's findings on November 9, 2018, and the Choctaw Nation of Oklahoma concurred on November 19, 2018.

In a letter dated October 23, 2019, FEMA determined that the project may have Adverse Effects to Historic Properties and recommended using the ACP to resolve those effects. SHPO agreed in a response dated November 25, 2019. The Seminole Nation of Oklahoma, GOHSEP, and the HDLC provided favorable responses dated October 26, October 28, and December 4, 2019 respectively.

The first Section 106 consultation meeting was held on December 16, 2019. FEMA published a Public Notice using the CRT website (<http://www.crt.state.la.us/dataprojects/culturalassets/fema106/>), from January 30 to February 14, 2020 and sent copies to participating consulting parties. No comments were received. On February 5, 2020, FEMA notified the Advisory Council on Historic Preservation (ACHP) of the Adverse Effects determination and intent to utilize the ACP and invited the ACHP to participate in the consultation process. The ACHP requested notification of the proposed treatment measures after consultations are concluded in a response letter dated April 20, 2020. Subsequent consultation meetings have been held on June 2, 2020, September 15, 2022 and September 19, 2022.

Description of the Undertaking

The DPS 01 Drainage Upgrades and Green Infrastructure project area is bounded by S. Broad St. on the north, Martin Luther King Jr. Blvd/Melpomene on the east, Tchoupitoulas St. on the south, and Louisiana Ave./Toledano St. on the west (Figure 1). The purpose of the proposed project is to reduce flooding, particularly in the Broadmoor and Central City neighborhoods, and to implement green infrastructure (GI) features to reduce runoff and create and enhance public landscape and park amenities. This will be accomplished by upgrading the City's stormwater drainage infrastructure with green storage, infiltration, and filtration landscape features along with pipes and street upgrades. Water storage will be added throughout the system to create a cascading effect that stores and retains runoff. The project also includes water and sewer improvements in addition to reconstruction of streets, sidewalks and other elements within the existing right-of-way.

The subrecipient's design reports describe five types of work: stormwater parks, stormwater lots, green intersections, pipe upgrades, and complete streets (see Table 1). Other work that will occur as a result of the drainage improvements includes pavement mill (cold planing) and overlay, full block reconstruction inclusive of any base and subbase course work, and engineering fabrics. This may include remediation of contaminated soils; repair/replacement/alterations to existing curbs, gutters, and drainage inlet structures; repair/replacement of sidewalks, ADA-compliant handicapped ramps, driveway aprons, manholes, valves and/or hydrants; removal/replacement of streetcar rails; restoration of medians, parking lanes, bike lanes, removal/replacement/improvements to water, sewer and drain pipes; clearing and grubbing/general excavation, root pruning and trenching, tree removal, tree trimming, seeding and fertilization, planting of trees, shrubs, and groundcovers.

Table 1. General Scope of Work Overview for DPS 01 Drainage Upgrades and Green Infrastructure

Work Type	General Description	Locations
Stormwater Parks and Lots	Subsurface storage tanks or surface dry detention with connections to drainage system	A.L. Davis, Annunciation, Clay, Saratoga, Taylor, Van McMurray, 3621/3623 3 rd Street, 3200 Jackson Ave
Green Intersections	Street basins, permeable paver crosswalks, subsurface tank storage	Annunciation at 2 nd St, Annunciation at 3 rd St, Chippewa at 2 nd St, Chippewa at 3 rd St, St. Thomas at Orange St
Pipe Upgrades	Existing pipes may be removed, abandoned, or retained and will be replaced by or augmented with larger sized pipes or multiple pipes	S. Tonti St, S. Roman St, S. Derbigny St, Washington Ave, Dryades St, Phillip St, Annunciation St, Chippewa St, Orange St, Race St
Complete Streets	Subsurface aggregate storage, pervious bike path and/or pavers along gutters, bioswales, new or upgraded pipes, roadway reconstruction	Baronne St, Phillip St, St. Thomas St, Annunciation St, Coliseum St

Excavating for repair/replacement of ADA compliant ramps, will generally be done to a depth of 12 inches; the excavation for repair/replacement of curbs, roads, and sidewalks will generally be done to a depth of up to 24 to 30 inches; the construction of stormwater storage will generally be done to a depth of between three and six-and-a-half feet; and excavating for repairing or replacing pipes, manholes, and inlets generally requires a depth of between four and ten feet. Previously disturbed soils may be reworked and compacted on site, temporarily removed and reused, or removed and replaced with clean fill or permeable materials based on conditions revealed onsite, geotechnical findings, or engineering designs created according to local standards and requirements.

As part of the grant application to FEMA, the subrecipient has also agreed to maintain the hazard mitigation improvements for 50 years and has included an annual budget for this maintenance as part of the overall project budget. The subrecipient has included a detailed maintenance plan in its specifications for the landscaping and green infrastructure facilities. The subrecipient will require the contractor performing the work to maintain the project for a period of three years after construction. After that three-year period, the subrecipient will be responsible for maintaining the components in accordance with the specifications for the life of the project.

This Hazard Mitigation drainage project intersects with several City of New Orleans Joint Infrastructure Recovery Request (JIRR) projects carried out under FEMA's Public Assistance Program. Specifically, portions of Central City Group A (RR 21), Central City Group B (RR 22), Central City Group C (RR 23), Central City Group D (RR 24), East Riverside/Garden District/Irish Channel/St. Thomas Group A (RR 35), and the Iberville/Tulane-Gravier/LGD/CBD Group A (RR 68) projects are planned within the project boundary for this Undertaking. All these projects, with the exception of RR 68, intersect or potentially tie into proposed construction activities. FEMA

utilized the ACP in the 2016 Statewide PA to meet its Section 106 responsibilities for the JIRR undertaking and identify measures to avoid, minimize and mitigate adverse effects to historic properties resulting from the JIRR projects. These measures are outlined in a letter from FEMA to SHPO, Tribes and other parties, dated December 11, 2018. ACHP notified FEMA that it supported the proposed resolution of adverse effects in a letter dated December 17, 2018. Figure 7 depicts the proposed JIRR work alongside the proposed Undertaking and shows how much more extensive the JIRR project is than the current proposed undertaking.

Area of Potential Effects (APE)

FEMA determined in consultation with SHPO that the Area of Potential Effect (APE) for the proposed Undertaking is discontinuous and takes into account both direct and indirect effects. The APE's are represented in Figures 2-5.

Identification and Evaluation

FEMA Historic Preservation staff consulted the National Register of Historic Places (NRHP) Database, the Louisiana Cultural Resource Map and associated files, internal FEMA Section 106 documents, and historic maps, and conducted site visits, in order to identify historic properties.

The APE contains a total of four (4) National Register of Historic Places (NRHP) listed properties. Table 2, below, summarizes these properties. Additionally, this project will directly affect four parks 50 years or older. FEMA has completed and submitted Louisiana Historic Resource Inventory (LHRI) forms for the parks (Table 3).

Table 2. Summary of NRHP listed above ground properties within the APE.

NRHP Property	Date of nomination	Area / Level of Significance
Irish Channel District	9/30/1976	Architecture, Music / Local
Lower Garden District	9/7/1972	Architecture, Commerce, Landscape Architecture, Religion / Unknown
Central City District	7/9/1982	Architecture / State
Magnolia Street Housing Project	8/27/1999	Social History / Local

Table 3. Summary of directly affected parks aged 50 years or older within the APE.

Property	Date of construction	NRHP Eligibility Determination	LHRI number
A.L. Davis	ca. 1893	Ineligible, SHPO consultation dated July 5, 2018	36-03446
Annunciation Square	ca. 1854	Contributing to Lower Garden Historic District, and individually ineligible	36-03447
Taylor Playground	ca. 1912	Ineligible	36-03449
Clay Square/Burke Playground	ca. 1852	Contributing to Irish Channel Historic District, and individually ineligible	36-03448

Historic landscape features in the NRHP districts that may be directly affected may include: brick or stone pavers (including driveways, driveway aprons, and crosswalks), brick or stone sidewalks (including footlaps), brick or stone parking boundaries, brick or stone curbs, distinctive concrete curbs, timber curbs, brick or stone open gutters, brick or stone gutter bottoms, steel curb guards, inlaid decoration in sidewalks, footlaps, driveways, and driveway aprons, construction company stamped impressions in sidewalks, utility covers, catch basins and grates, street name ceramic tiles, house number ceramic tiles, streetlights, streetcar catenary standards (including light mechanism),

relic streetcar tracks and pavers, traffic bollards, hitching posts, signage (e.g. wayfinding, historical markers), mounting blocks or steps (aka carriage steps, footbridges over open gutters), horse troughs, boundary markers and laud monuments, sculpture/statuary, commemorative monuments, fences/walls/gates, two-track driveways, retainer gardens, and abandoned fire hydrants.

A total of [REDACTED] archaeological sites have been previously recorded within the overall project boundary. [REDACTED]

FEMA conducted archaeological investigations at four parks and one stormwater lot as part of this proposed undertaking. [REDACTED]

[REDACTED] FEMA determined, and SHPO concurred (11/9/2018), that none of these new sites are eligible for listing in the NRHP. [REDACTED]

The Saratoga block, proposed for rain garden construction, is bounded by Loyola Street to the north, 6th Street to the east, S Saratoga Street to the south, and 7th Street to the west. Historic cemeteries St. Joseph Cemetery No. 2 and Lafayette Cemetery No. 2 are located across Loyola Street and 6th Street from the Saratoga block, respectively. [REDACTED]

Environmental studies and coordination between CNO and Louisiana Department of Environmental Quality document that the Saratoga block has contaminated soils resulting from incinerators and other contamination sources and requires remediation prior to construction or use of the site. This remediation will be performed and funded by the City of New Orleans without the use of FEMA funds.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] FEMA sent copies of the report to consulting parties on July 20, 2022 and received one concurrence from the Eastern Shawnee Tribe of Oklahoma on September 15, 2022. No other responses were received.

Based on the identification and evaluation described, FEMA has determined that there are at least eight historic properties, as defined in 36 CFR §800.16(l), within the APE: Irish Channel District, Lower Garden District, Central City District, the Magnolia Street Housing Project, Annunciation Park, Clay Square, and archaeological sites [REDACTED]

Assessment of Effects to Historic Properties

Of the eight historic properties identified within the APE, FEMA has determined that the Irish Channel, Lower Garden, and Central City Historic Districts will be directly affected by work within their boundaries. The removal or alteration of character defining streetscape elements will diminish these districts' integrity of materials and workmanship. The introduction of incompatible materials (pervious pavements and gutters) and other elements within this project such as vegetated street basins, bioswales, bike lanes and the Saratoga Square Stormwater Park will introduce visual intrusions that may alter the setting of these districts.

Avoidance and Minimization, Built Environment

During the design development process, FEMA, in accordance with Stipulation II.C.5(b), requested the sub-recipient modify the scope to avoid or minimize effects to historic properties. The subrecipient has taken steps to avoid and minimize effects to historic properties by avoiding NHL districts, relic streetcar tracks, and areas where substantial character defining features (CDFs) are found within the districts. The 100% design reflects the consideration of historic properties throughout the design process compared to the schematic design as represented in FEMA's initial notification to parties, dated February 9, 2017.

FEMA recognizes that it is likely that additional character defining features will not be identified during construction and may not be repaired or replaced in-kind. It is also likely that it may be technically infeasible to repair identified character defining features or replace them in-kind.

The CNO will include conditions to avoid or minimize adverse effects to the identified character defining features in the built environment, in particular, streetscape features typically found in the National Register Historic Districts (NRHDs) of New Orleans, listed in Appendix 1. These conditions will be included the special specification of each project within a listed NRHD. The CNO will record the following CDFs, if scheduled for removal because repair or replace in-kind is technically infeasible:

brick or stone street pavers (including driveways and driveway aprons); brick or stone parking boundaries; brick or stone crosswalks; brick or stone curbs; brick or stone open gutters; brick or stone gutter bottoms; inlaid decoration in sidewalks, footlaps, driveways, or driveway aprons; streetcar tracks or pavers; mounting blocks or steps (aka carriage steps, footbridges over open gutters); and abandoned fire hydrants.

Recordation of CDFs, where required, must be documented with high quality digital photos, and these photos must include geolocation information. Photos should be at least 300 ppi, high enough

quality to be included in publication materials, and the features must be cleared of debris prior to being photographed.

In addition, the CNO historic preservation specialists will review the final bid documents and provide any comments/markups to the CNO Project Manager and will inform any construction contractor staff of conditions and best practices during the preconstruction meeting(s).

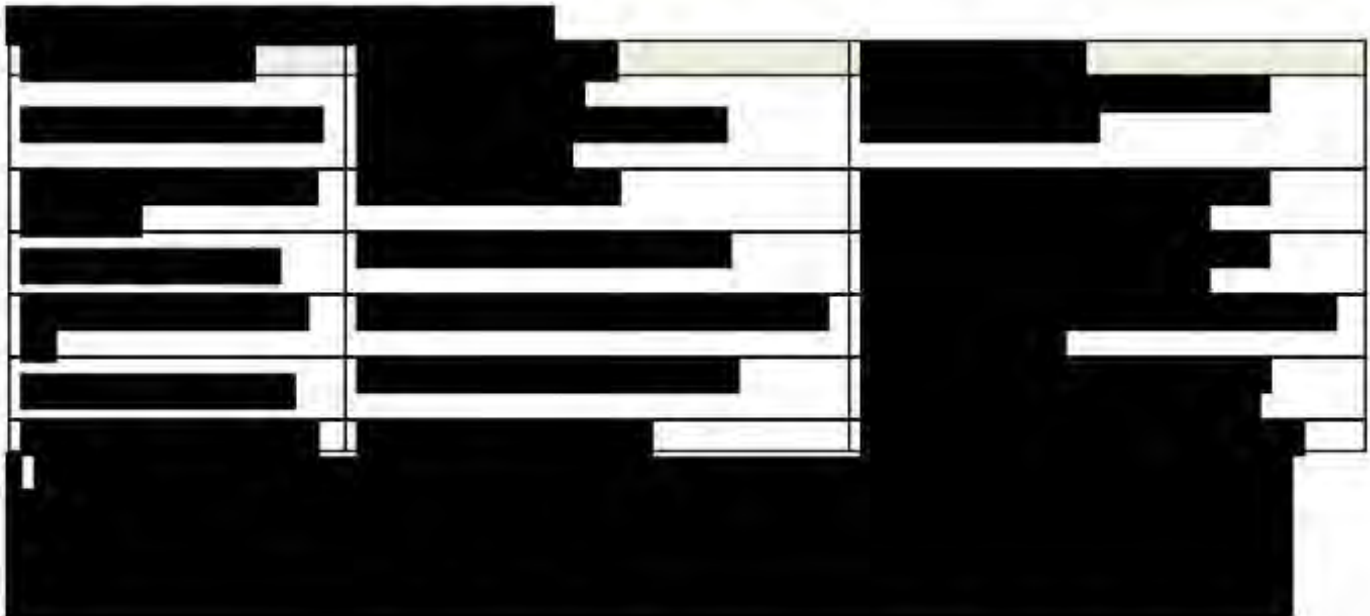
Avoidance and Minimization, Archaeology

While most work will occur within existing and previously disturbed rights-of-way and existing streets, deposits from both the NRHP eligible archaeological sites may be directly affected by proposed construction activities. Measures to avoid archaeological deposits have been considered by CNO and some sensitive sites have been avoided during design development. [REDACTED]

[REDACTED] Avoidance of all archaeological sites, however, is difficult due to the nature of the proposed undertaking that occurs within hard paved areas, the lack of greenspace for underground water storage, and the subsurface nature of the utility work. Based upon available evidence, recorded and unrecorded archaeological deposits [REDACTED] may be affected as these sites may not conform to the city's current street grid. As these sites likely lie below the street surface, it is often not feasible for them to be identified prior to construction. Even where there are records of an archaeological site, the location may not be accurate. To minimize or avoid affects to both unrecorded and recorded sites that are undetermined or eligible for listing in the NRHP, FEMA has determined in consultation to require the CNO to have an archaeologist meeting the Secretary of Interior (SOI) Professional Standard for Archaeology (SOI archaeologist) monitor work at locations identified by previous investigations, archival maps, and consulting parties as having a high potential for yielding data in close proximity to the proposed undertaking. These locations are identified in Table 4 below.

The CNO will ensure ground disturbing activities [REDACTED]

[REDACTED] are monitored by a SOI archaeologist (Figures 29-33). No later than six months after construction is complete, CNO's SOI qualified archaeologist or contractor will submit a draft monitoring report, to include all monitored locations, following SHPO standards to FEMA for review. FEMA will coordinate with CNO to submit the draft report to GOHSEP, SHPO, and interested federally recognized Tribes for their review and 30 day comment period. CNO will ensure any received comments are addressed and incorporated into the final report. No later than 90 days after receipt of comments, CNO will submit the final report to FEMA. FEMA will coordinate with CNO to submit the final report to GOHSEP, SHPO, and interested federally recognized Tribes. Details of the monitoring locations are shown in Table 4.



FEMA and CNO, in consultation with SHPO, Tribes, and GOHSEP, will utilize the protocols in Appendix 2 for the avoidance, collection, identification, storage, and reinterment of human remains and standards for reports on each discovery of human remains. Any artifacts collected as a result of fieldwork will remain the property of the landowner, CNO in this case. FEMA encourages the CNO to transfer any recovered artifacts and related documentation to an appropriate archive or public entity. CNO will ensure that field and laboratory records sufficient to document the collection are curated in a suitable repository as agreed to by FEMA, SHPO, and affected Tribe(s), following applicable State or Tribal guidelines. FEMA, in coordination with SHPO and affected Tribe(s), will work with CNO to support steps that ensure the long-term curation of the artifacts and documents.

Conclusion

Despite the consideration of historic properties and minimization efforts on the part of the subrecipient, FEMA expects that historic properties may be adversely affected by the proposed undertaking, namely character defining streetscape features within NRHP historic districts and archaeological deposits. Therefore, pursuant to 36 CFR §800.5 and in accordance with Stipulation II.C.6(a) of the 2016 PA, FEMA has determined that the Undertaking may have an **Adverse Effect to Historic Properties** and proposes the use of Treatment Measures to address adverse effects to character defining features within NRHDs, NRHP eligible archaeological deposits, and human remains.

Treatment Measures

Per Stipulation II.C.6(a) of the 2016 PA, FEMA recommends the adverse effects of the Undertaking will be adequately mitigated through the Abbreviated Consultation Process (ACP) and the implementation of Treatment Measures outlined in Appendix C: III. Public Interpretation, IV. Context Statements, and VI. Historic Property Inventory. These Treatment Measures are generally meant to expand and supplement the previously agreed upon JIRR Treatment Measures.

Public Interpretation (III.) – CNO will ensure that information and data resulting from the fieldwork and cultural resource context statement will be incorporated, if feasible, into the

public outreach materials currently under development as outlined in the JIRR ACP Treatment Measures.

Public Outreach: CNO will provide a plan for incorporating data into the JIRR public outreach component. CNO will submit a draft of the materials to FEMA for review. CNO will coordinate with FEMA to provide SHPO, GOHSEP, and Tribes with the draft materials along with the JIRR historic context, for a thirty (30) day comment period. CNO will incorporate the comments, if any, into the final product. If the consulting parties do not provide comments on the draft within 30 days of the submission, CNO may finalize the materials. CNO will also provide a digital copy of the final materials to FEMA and will coordinate with FEMA to provide the final digital copy of materials to all consulting parties and Tribes. These materials will be submitted in conjunction with JIRR ACP deliverables. Final materials will be provided no later than 2 years of the execution of this document.

Context Statements (IV.)

Cultural Resource Context Statement: CNO will produce a plan for incorporating the archaeological data into the JIRR Cultural Resource Context Statement and Map. CNO will ensure that a draft of the Cultural Resource Context Statement and Map for this Undertaking will be produced and will provide SHPO, FEMA, GOHSEP, and Tribes with the draft materials for a thirty (30) day comment period. CNO will incorporate the comments, if any, into the final materials. If the consulting parties do not provide comments on the draft within thirty (30) days following submission, CNO will finalize the materials for inclusion in the JIRR Cultural Resource Context Statement final products. CNO will provide a digital copy of the final draft materials to FEMA and will coordinate with FEMA to provide the final digital copy of materials to all consulting parties and Tribes. These materials will be submitted in conjunction with JIRR ACP deliverables. Final materials will be provided no later than 2 years of the execution of this document.

Historic Context Statement: CNO will produce a plan for incorporating information about the NRHD affected by this Undertaking: Irish Channel, Lower Garden, and Central City Districts into the historic context focused on the streetscape of NRHP Historic Districts, outlined in the JIRR ACP. CNO will ensure that a draft of the Historic Context Statement for this Undertaking will be produced and will provide SHPO, FEMA, GOHSEP, and Tribes with the draft materials for a thirty (30) day comment period. CNO will incorporate the comments, if any, into the final materials. If the consulting parties do not provide comments on the draft within thirty (30) days following submission, CNO will finalize the materials for inclusion in the JIRR Historic Context Statement final products. CNO will provide a digital copy of the final materials to FEMA and will coordinate with FEMA to provide the final digital copy of materials to all consulting parties and Tribes. These materials will be submitted in conjunction with JIRR ACP deliverables. Final materials will be provided no later than 2 years of the execution of this document.

Historic Property Inventory of CDFs (VI.): CNO will be responsible for conducting the research and field (sampling) survey of character defining streetscape features indicative of each NRHP listed or eligible historic district located within the APEs. The inventory will

follow the guidelines set forth in the JIRR ACP. Concurrent research, field (sampling) survey and data collected for the JIRR ACP Treatment Measures on the NRHD affected by this Undertaking shall satisfy the requirements for the purpose of the Historic Property Inventory of CDFs. The CDF list is included as Appendix 1. This inventory will not provide a count of every feature but will provide a thorough sampling which will inform the content of and provide a basis for analysis and synthesis in the historic context statement.

CNO will produce a draft of all data, images, and reports associated with the recordation of CDFs, the historic property inventory, and historic context statement for this Undertaking, and provide SHPO, FEMA, GOHSEP, and Tribes with the draft materials for a thirty (30) day comment period. CNO will incorporate the comments, if any, into the final materials. If the consulting parties do not provide comments on the draft within thirty (30) days following submission, CNO may finalize the materials for inclusion with the JIRR recorded CDFs, historic property inventory, and historic context statement products. CNO will provide a digital copy of the final materials to FEMA and will coordinate with FEMA to provide the final digital copy of materials to all consulting parties and Tribes. These materials will be submitted in conjunction with JIRR ACP deliverables. Final materials will be provided no later than 2 years of the execution of this document.

Reporting on Treatment Measures

CNO will provide consulting parties a semi-annual report on the progress of the Treatment Measures on or around March 15 and September 15 of each year until they are complete. This report should be documented separately but may be submitted in conjunction with the semi-annual report required under the JIRR ACP. FEMA will provide written notice to GOHSEP, CNO, SHPO, participating Tribes, and other consulting parties, as appropriate, within sixty (60) days of the completion of the Treatment Measures as required by Stipulation II.C.6 (a) iii of the 2016 PA, FEMA shall include information pertaining to the progress of and completion of all Treatment Measures in the annual report pursuant to Stipulation I.B.1 (d), FEMA Roles and Responsibilities in the 2016 Statewide PA, as amended. The semi-annual report should include any updates on archaeological monitoring, discoveries, notifications, and minimization efforts as well any unforeseen affects.

Discoveries and Unexpected Effects

CNO will hold pre-construction meetings with the construction contractor's and subcontractor's staff prior to beginning fieldwork. The pre-construction meetings will include information on recognizing archaeological deposits during construction, the role of the archaeological monitor, and on discoveries and unexpected effects procedures. The handout, included as Appendix 3, will be provided at the meeting for distribution to the construction field crew. The CNO archaeologist and historic preservation specialist will attend and provide professional support at the pre-construction training sessions as appropriate. The CNO archaeologist and historic preservation specialist will discuss the HP and Archaeology conditions on the project which may include but is not limited to handouts, slides or videos to inform the contractor(s) of best practices.

If evidence of archaeological deposits is discovered or if unexpected effects occur during construction and/or monitoring, CNO will require that construction immediately cease within 100

feet of the location of the discovery and take all reasonable measures to avoid or minimize harm to the finds. **The archaeological monitor, the Project Manager, Construction Manager, and Inspectors will be empowered to immediately stop work if unanticipated discoveries and/or unexpected effects occur during construction.** This stipulation will be explicitly stated in the project requirements. Construction may continue outside the defined discovery location. The stop work order will allow sufficient time for the archaeologist to assess the discovery and/or unexpected effect(s) and take any necessary steps. As part of this response he or she will be responsible for identifying and evaluating the discovery or unexpected effect including assessing the NRHP eligibility in consultation with FEMA, SHPO, Tribes, and GOHSEP; developing a response or mitigation strategy in consultation with FEMA, SHPO, Tribes, and GOHSEP; when appropriate, undertaking the agreed-upon response or mitigation effort; and preparing a written report on the discovery or unexpected effect and the actions taken. This report will be provided to FEMA, SHPO, Tribes, GOHSEP, and other parties, as appropriate.

If the discovery appears to be human remains, the CNO archaeologist will determine the course of action following the protocols in Appendix 2 (Unmarked Burial Act). If the discovery appears to be pre-contact, contact or colonial era archaeological deposits, the archaeologist will assess the NRHP eligibility of the discovery in consultation with FEMA, SHPO, Tribes, and GOHSEP; develop a response or mitigation strategy in consultation with FEMA, SHPO, Tribes, and GOHSEP; when appropriate; undertake the agreed-upon response or mitigation effort; and prepare a written report on the discovery and the actions taken. This report will be provided to FEMA, SHPO, Tribes, GOHSEP, and other parties, as appropriate. The archaeologist will record any post-colonial era discovery but is not required by this agreement to take further action to minimize or mitigate effects to such discoveries since these potential effects have been addressed through the Treatment Measures described above. Any discoveries or unexpected effects will also be included in the semi-annual report described above.

Dispute Resolution

If SHPO or Tribe(s) notifies FEMA in writing of concerns about the effects to historic properties caused by any plans, specifications, or actions taken to implement the project, FEMA shall consult further with the objecting party to seek resolution. FEMA may request other consulting parties to participate in this consultation to resolve the objection. If FEMA determines the objection cannot be resolved, FEMA shall address the objection in accordance with Stipulation IV.B, Dispute Resolution of the 2016 Statewide PA.

Public Objections

If a member of the public raises an objection regarding the implementation of the measures set out in this letter at any time during their implementation, FEMA shall take the objection into account, notify CNO, GOHSEP, SHPO, and Tribes, as appropriate, and consult as needed with the objecting party, CNO, GOHSEP, and Tribes, as appropriate, prior to FEMA's resolution of the objection. CNO is not required to cease work on activities unrelated to the objection while the objection is being reviewed and resolved. FEMA will notify ACHP of its resolution of a public objection.

Copies or Summaries of Views by Consulting Parties and the Public

FEMA submitted the Adverse Effect consultation letter dated October 23, 2019 to the Preservation Resource Center of New Orleans, the Louisiana Landmarks Society, the Historic District

Landmarks Commission, Harmony Oaks Neighborhood Association, Central City Renaissance Alliance, Irish Channel Neighborhood Association, Lower Garden District Association, Garden District Association, and Harmony Neighborhood Development for their review and comments as required by 36 CFR §800.4(d)(1), and requested they provide comments within 30 days provided by the 2016 Statewide PA. Urban Strategies provided questions regarding the potential for jobs in the community and offered to provide a space for any future public meetings. FEMA shared these comments with CNO. No other comments were provided.

FEMA requested public input by posting a notice on the Louisiana Department of Culture, Recreation & Tourism website: (<http://www.crt.state.la.us/dataprojects/culturalassets/fema106/>) describing this Undertaking, its effects on historic properties, and FEMA's proposed treatment to mitigate adverse effects for a 15-day comment period and received no comments. During review of the public notice by consulting parties prior to posting, the Central City Renaissance Alliance (CCRA) expressed concerns about the community outreach for the project, asked about the public engagement strategy, and offered to assist in educating the community.

CNO will provide information regarding the Section 106 review for its pre-construction community meetings and website. CNO will provide a draft of this information to FEMA, and FEMA will provide it to the SHPO for a 15-day review. CNO shall incorporate FEMA's and SHPO's comments prior to providing it to the public.

FEMA is submitting this proposal to SHPO, CNO, GOHSEP, Tribes, ACHP, Urban Strategies, CCRA, and the Lower Garden District Association to address the Adverse Effects of this Undertaking through Treatment Measures outlined in Stipulation II.C.6(a) of the 2016 PA for your review and comment. FEMA requests your comments within 30 days.

We respectfully request concurrence with the proposed treatment measures. Should you need additional information please contact me at (504) 247-7771 or jerame.cramer@fema.dhs.gov; Annette Carroll, HP Specialist, at annette.carroll@fema.dhs.gov or (504) 256-1900; or Cheraki Williams, Archaeologist, at cheraki.williams@fema.dhs.gov or (504) 289-1230.

Sincerely,

Jeramé J. Cramer
EHP Program Lead Louisiana
FEMA Region 6
Louisiana Integration & Recovery Office
Baton Rouge, LA

CC: File
«cc_1»
«cc_2»
«cc_3»

Enclosures



Figure 1. USGS topographic map showing the project location in New Orleans, including project/area boundaries and work type locations.



Figure 2. Aerial imagery showing the APNs for work proposed in Area 1.



Figure 3. Aerial imagery showing the APEs for work proposed in Area 2.



Figure 4. Aerial imagery showing the APEs for work proposed in Area 3.



Figure 5. Aerial imagery showing the APEs for work proposed in Area 4.

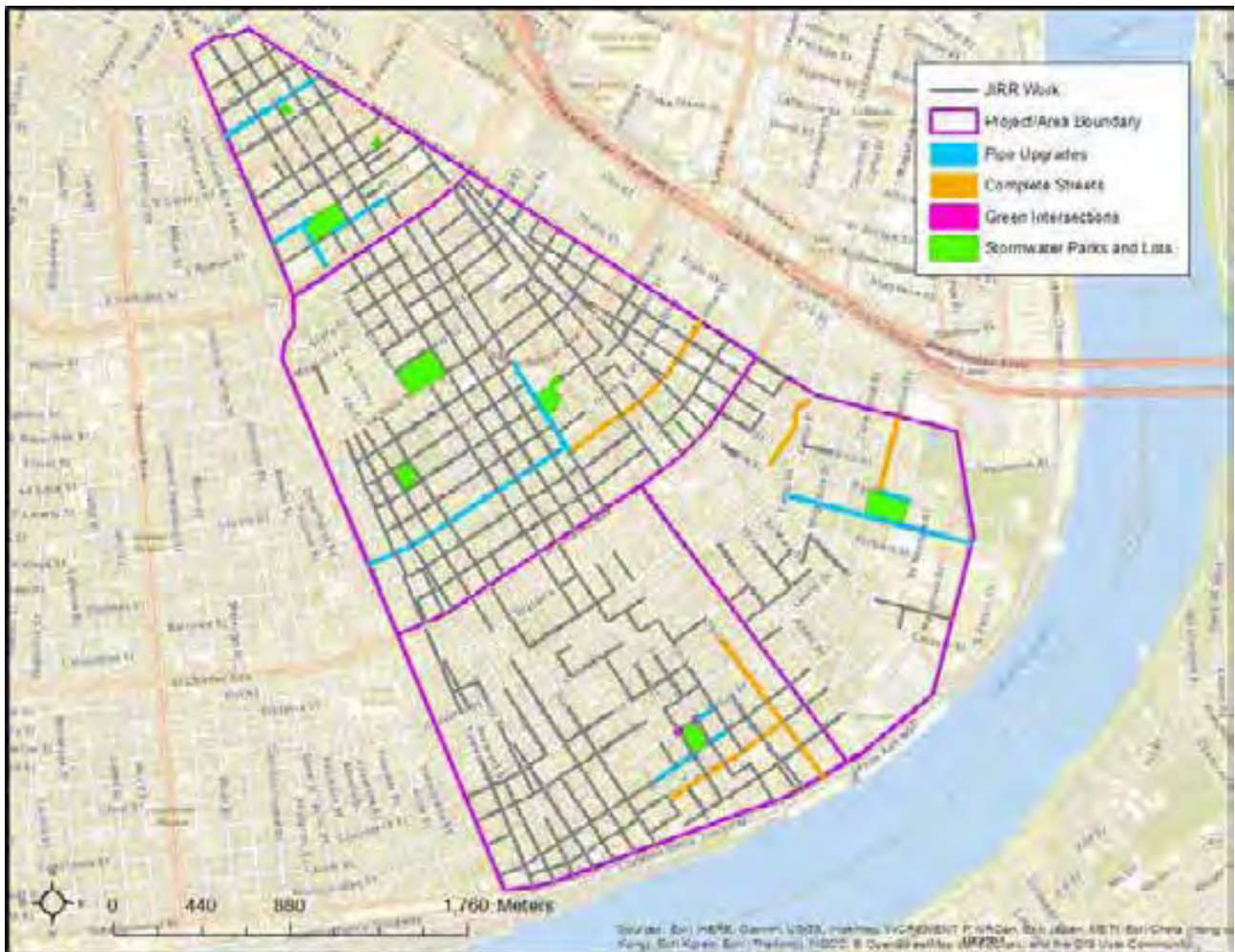


Figure 7. Street map showing the overlap of JIRR related work with the proposed DPS-01 work. Note the quantity of JIRR work compared to the current proposed Undertaking.



Figure 8. Representative view of Tonti St. (Google Street View, 11/2018), looking northeast from Toledano St. Scope of work along six blocks of Tonti St. from Toledano to Martin Luther King Jr. Blvd. includes replacement of roadway, construction of ADA ramps at street corners, replacement of sidewalks, and replacement of existing drainage pipes and structures with green infrastructure drainage design in the area between the roadway and edge of right-of-way. This area is not within an a NRHP listed/eligible historic district.



Figure 9. View of Stormwater Lot 1, 3621/3623 3rd St. (Google Street View 11/2018), looking northeast. Scope of work includes removal of one 24" willow tree; demolition/replacement of concrete sidewalk, curb, and asphalt roadway; excavation of property; construction of surface dry detention ponds, new catch basins, a concrete runnel and footbridge; and installation of plant material. This area is not within an a NRHP listed/eligible historic district.



Figure 10. View of Stormwater Lot 2, 3200 Jackson Ave. (Google Street View 11/2018), looking northwest. Scope of work includes demolition/replacement of concrete sidewalk and curb; excavation of property; construction of surface retention ponds, new catch basins, two concrete runnels and footbridges; and installation of plant material. This area is not within an a NRHP listed/eligible historic district.



Figure 11. View of Taylor Park, looking southeast. Scope of work includes excavation for and placement of underground stormwater storage tanks, and the repair and improvements to these areas following the placement of tanks. On the park perimeter, scope will include the demo/replacement of concrete sidewalks and construction of ADA ramps. This area is not within an a NRHP listed/eligible historic district.



Figure 12. Representative view of Annunciation St. (Google Street View, 11/2018), looking northeast from Race St. Scope of work along three blocks from Race St. to Calliope St. includes replacement of roadway, construction of ADA ramps at street corners, installation of permeable paver crosswalks and gutters, re-striping parking lane, and replacement of existing water and drainage pipes and structures within the roadway. This area is located within the NRHP listed Lower Garden Historic District.



Figure 13. View of intersection at Annunciation St. and Third St. (Google Street View, 11/2018), looking northeast. Scope of work includes replacement of water lines; construction of a green intersection at this location, including replacement of roadway, construction of green drainage system under roadway, installation of permeable paver crosswalks and gutters, construction of vegetated street basins, narrowing of the roadway; and construction of ADA ramps and replacement of curbs and sidewalk. This area is located within the NRHP listed Irish Channel Historic District.

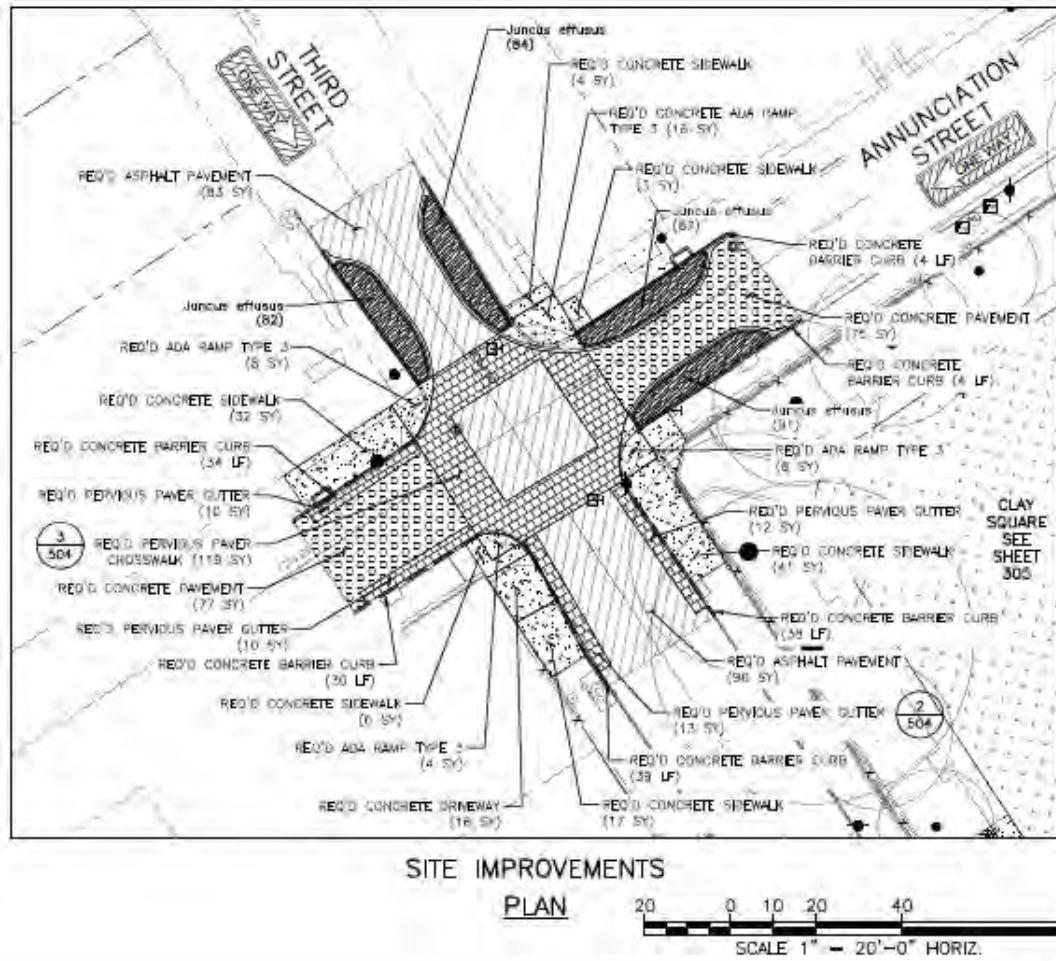


Figure 14. Proposed plan of intersection at Annunciation St. and Third St.



Figure 15. View of A.L. Davis Park, looking southeast (Google Street View, 11/2018). Scope of work includes demo/replacement of concrete pads and sidewalk, excavation for and placement of underground stormwater storage tanks, and the repair and improvements to these areas following the placement of tanks. On the park perimeter, scope will include the demo/replacement of concrete sidewalks, concrete curb, and concrete roadway, construction of ADA ramps. This area is surrounded by the NRHP listed Central City Historic District.



Figure 16. View Clay Square/Burke Park, looking southwest (Google Street View, 11/2018). Scope of work includes alterations to a small amount (14 lf) of the perimeter stone curb and metal fence, demo/replacement of a small portion of concrete sidewalk and high-mast lighting fixtures, excavation for and placement of underground stormwater storage tanks, and the repair and improvements to these areas following the placement of tanks. On the park perimeter, scope will include the demo/replacement of concrete sidewalks and curb. This area is located within the NRHP listed Irish Channel Historic District.



Figure 17. View of Annunciation Park, looking northeast (Google Street View, 11/2018). Scope of work includes demo/replacement of baseball backstop, excavation for and placement of underground stormwater storage tanks, repair and improvements to these areas following the placement of tanks, and planting of trees along Annunciation St. On the park perimeter, scope will include the demo/replacement of concrete sidewalks. This area is located within the NRHP listed Lower Garden Historic District.



Figure 18. View of intersection at St. Thomas St. and Orange St. (Google Street View, 11/2018), looking northeast. Scope of work entails construction of a green intersection at this location, including replacement of roadway, construction of green drainage system under roadway, installation of permeable paver crosswalks and gutters, and construction of ADA ramps and replacement of curbs. This area is located within the NRHP listed Lower Garden Historic District.



Figure 19. Representative view of Dryades St. (Google Street View, 11/2018), looking northeast from Louisiana Ave. Scope of work along ten blocks from Louisiana Ave. to Philip St. includes construction of ADA ramps at street corners, and replacement of roadway curbs, and existing water and drainage pipes and structures within the existing right-of-way. This area is located within the NRHP listed Central City Historic District.



Figure 20. Representative view of Baronne St. (Google Street View, 11/2018), looking northeast from Philip St. Scope of work along seven blocks from Philip St. to Martin Luther King Jr. Blvd. includes reconfiguration of the roadway within the existing right-of-way and construction of green infrastructure. The proposed design will reduce the number of lanes from two to one lane; introduce new permeable asphalt bike lanes, bioswales, pedestrian footbridges, permeable paver gutters and medians; construct concrete driveway aprons and lengthen driveways; construct ADA ramps at street corners; replace concrete sidewalks, existing water and drainage pipes and structures, fire hydrants; and remove 26 existing trees, and install additional trees, shrubs, ground cover. This area is located within the NRHP listed Central City Historic District.

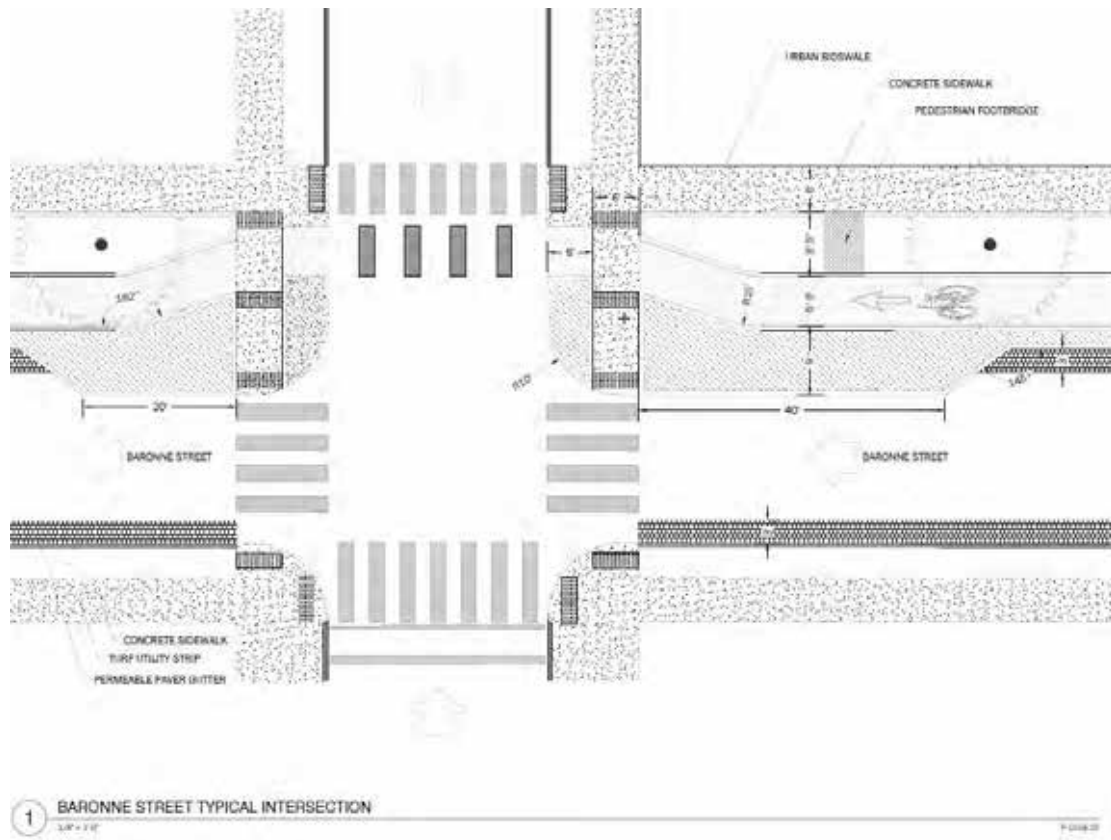


Figure 21. Proposed plan of typical intersections on Baronne St.



Figure 22. View of intersection at Chippewa and Third St. (Google Street View, 12/2018), looking northeast. Scope of work entails replacement of water lines; construction of a green intersection at this location, including replacement of roadway, construction of green drainage system under roadway, installation of permeable paver crosswalks and gutters, construction of vegetated street basins, narrowing of the roadway; and construction of ADA ramps and replacement of curbs and sidewalk. This area is located within the NRHP listed Irish Channel Historic District.

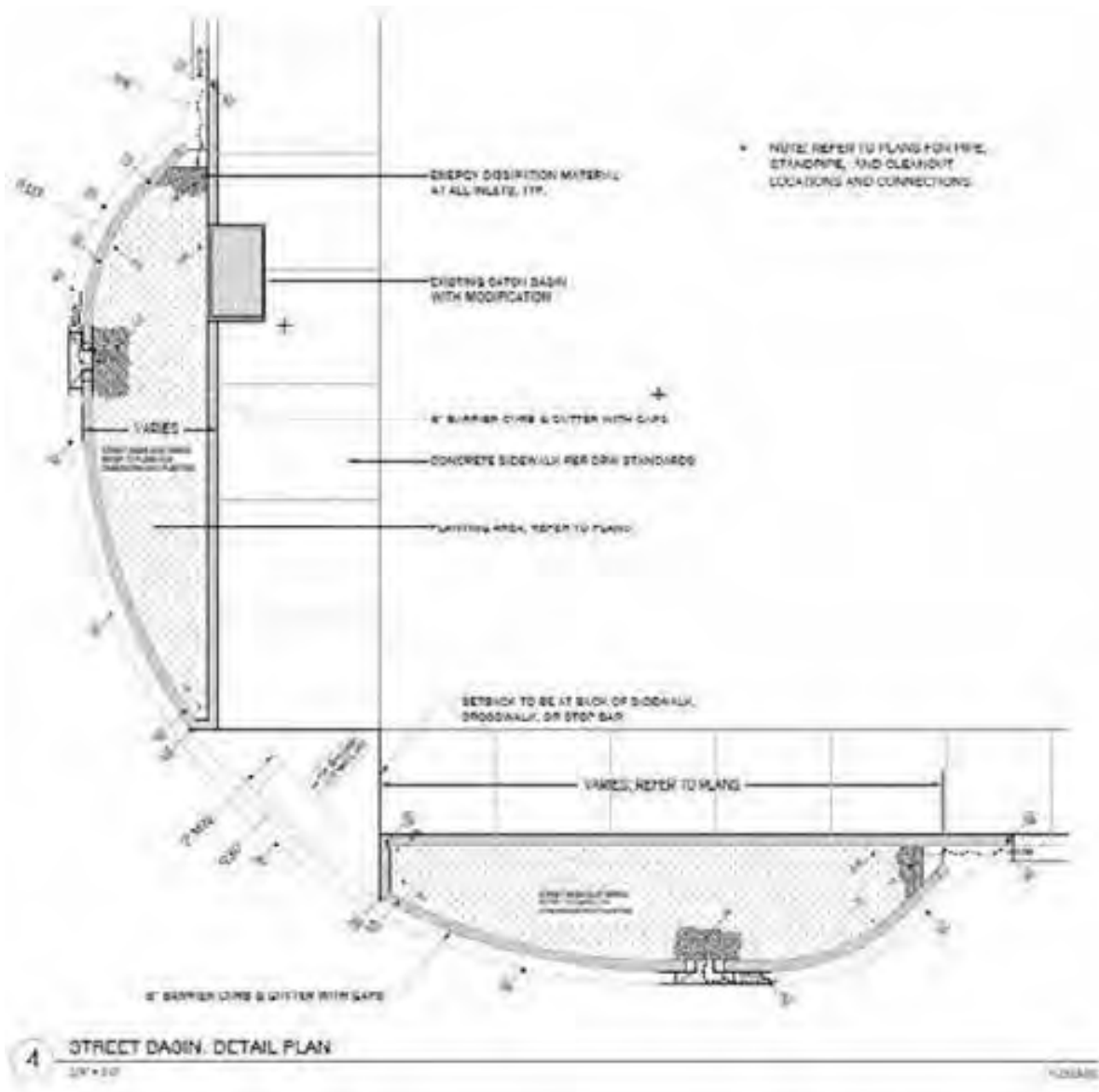


Figure 23. Detail Plan of Vegetated Street Basin.

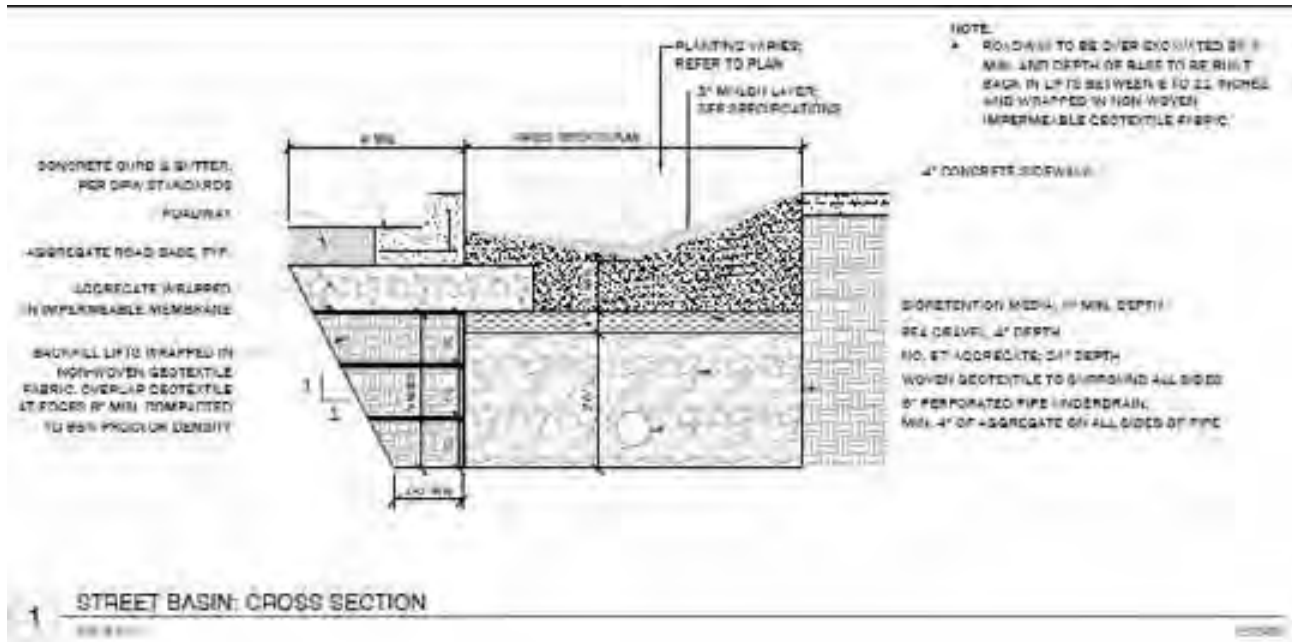


Figure 24. Cross Section of Vegetated Street Basin.



Figure 25. Representative view of Coliseum St. (Google Street View, 1/2019), looking northeast from Race St. Scope of work along four blocks from Race St. to Melpomene St. includes, installation of yellow thermoplastic pavement striping (crosswalks and no parking zones) and permeable paver gutters, construction of ADA ramps, and replacement of curbs, roadway, and existing water and drainage pipes and structures within the existing right-of-way. This area is located within the NRHP listed Lower Garden Historic District.



Figure 26. View of Saratoga Square, looking west (Google Earth Street View, 11/2018). Scope of work includes demolition/replacement of sidewalks, curbs, ADA ramps, and small segments of roadway around the perimeter of the city block; demolition/clearing of block; excavation and construction of multiple, interconnected detention ponds for the collection of stormwater; construction of supporting surface and underground drainage structures, interior park sidewalks; and planting of trees, shrubs, and groundcover. This area is located within the NRHP listed Central City Historic District.



Figure 28. View of Van McMurray Playground, looking northeast (Google Earth Street View, 12/2018). Scope of work includes removal of paving material, four trees, four bollards, a basketball court, fences, gates, backstop, a driveway apron, and sidewalks; excavation for and placement of underground stormwater storage tanks; and the repair and improvements to these areas following the placement of tanks, including the planting of trees, installation of permeable pavers, and chain link fence. On the park perimeter, scope will include the demolition of bollards, and demo/replacement of concrete sidewalks. This is not within a listed or eligible NRHP District.

Appendix D: Final CAP and approval from LDEQ

JOHN BEL EDWARDS
GOVERNOR



ROGER W. GINGLES
SECRETARY

State of Louisiana

DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL ASSESSMENT

SEP 14 2023

City of New Orleans
Capital Projects Administration
C/O Ms. Erika Boerr
1300 Perdido Street Ste. 6E15
New Orleans, LA 70112

RE: No Further Action Notification
Former South Saratoga Street Incinerator; **AI Number 44056**
2943 South Saratoga Street
New Orleans, Orleans
City, Parish, LA

Dear Ms. Boerr:

The Louisiana Department of Environmental Quality - Remediation Division (LDEQ-RD) has completed its review of the Conveyance Notice dated March 01, 2023 for the above referenced Area of Investigation (AOI) located at 2943 South Saratoga Street, New Orleans, LA in Orleans Parish. Based on our review of this document and all previously submitted information, we have determined that no further action is necessary at this time for the AOI. The Basis of Decision (BOD) for this notification is attached.

The chemical concentrations within the boundaries of the AOI are protective of human health and the environment for the AOI addressed in this notice. Environmental media present in other areas of the property are not addressed by this notification. Soils removed from the AOI and placed at another location may present potential risks to human health and the environment that differ from, or were not evaluated for, the AOI. For this reason, soil removed from the AOI shall comply with *LAC 33 Part VII Chapter 11, Solid Waste Beneficial Use and Soil Reuse*, or shall be disposed at a permitted disposal facility.

Ms. Boerr
AI Number 44056
Page 2

If you have any questions or need further information, please call Shonette M. Matthews at (504) 736-7766. Thank you for your cooperation in addressing this area.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Estuardo Silva', with the word 'for' written in smaller letters to the right.

Estuardo Silva, P.G.
Administrator
Remediation Division

Attachment: *Basis of Decision*

c: *Imaging Operations -IAS*

Darlene Williams – RD
Vicki Thibodeaux – RD

Braelin Carter – Materials Management, Inc.
2401 Westbend Parkway, Ste. 3010
New Orleans, LA 70114

BASIS OF DECISION FOR NO FURTHER ACTION

Former South Saratoga Street Incinerator Site Area of Investigation

2943 South Saratoga Street, New Orleans, LA

AI Number 44056

The Louisiana Department of Environmental Quality – Remediation Division (LDEQ-RD) has determined that the Former South Saratoga Street Incinerator Site Area of Investigation (AOI) requires No Further Action At This Time (NFA-ATT). The chemical concentrations within the boundaries of the AOI are protective of human health and the environment for the AOI addressed in this notice. Environmental media present in other areas of the property are not addressed by this notification.

The AOI addressed by this Basis of Decision (BOD) for NFA-ATT is currently vacant but was formerly used to house two former municipal incinerators and a solid waste transfer station. The first incinerator operated onsite from the 1930s to 1958. Shortly thereafter, a second incinerator was constructed onsite and operated until 1974. The site was used as a solid waste transfer station from 1974 until 1986 (EDMS ID: 12582820). In 1987, all above ground structures were demolished and removed from the site. Based on the information provided, this site is part of the City of New Orleans Broadmoor Drainage Upgrades & Green Infrastructure project plan for redevelopment as a green infrastructure with dry storm water retention ponds.

In the mid-1990s, EPA designated the site as a pilot project under its Brownfields Economic Redevelopment Initiative. A Brownfield Assessment and Recommendation Report was submitted on June 12, 1997 (EDMS ID: 7394068). The report indicated that certain constituents, polycyclic aromatic hydrocarbons (PAH), metals, and polychlorinated biphenyls (PCB), were present in soil at concentrations that exceeded EPA Region 6 residential media-specific screening levels. Additional sampling was conducted to further characterize site conditions and the analytical results were submitted on September 12, 2001 (EDMS ID: 7510441). On February 20, 2004, a Field Investigation Report was submitted which provided further characterization of soil and groundwater conditions at the site (EDMS ID: 364316). On June 3, 2004 (EDMS ID: 2363060) and on June 10, 2004 (EDMS ID: 2400776), RECAP evaluations of the 1996 and 2003 site investigation data were submitted. A Voluntary Remedial Investigation Report, dated April 2, 2009, indicated elevated concentrations of lead and PAH in soil at a depth of 3 ft below ground surface (bgs) (EDMS ID: 6359991). In response to this finding, additional soil investigation was conducted (EDMS ID: 6359991). The results of the investigation indicated the presence of lead and PAH at concentrations above the RECAP Management Option-1 non-industrial standards. A Corrective Action Report was submitted on February 18, 2021 to address the remediation of lead and PAH impacted surface soil (EDMS ID: 12582820). Further excavation and confirmatory sampling were conducted on November 28, 2022 to address the presence of lead in soil at sampling location SB-11 (EDMS ID: 13574780 and 13456793).

Aquifer yield at the site is less than 800 gallons per day (gpd) based on Touro Infirmary well located approximately 0.61 miles from the subject Former S. Saratoga Incinerator site at 2943 S. Saratoga Street. Consequently, groundwater is classified as GW_{3NDW} with the Washington Avenue Canal as the nearest point of exposure which is classified as a non-drinking water source.

The chemical of concern concentrations remaining at the AOI comply with the RECAP MO-1 non-industrial standards with the exception of lead at two confirmatory sampling locations: sampling location

S-ASIDE-01 (lead at 440 mg/kg) was present below the ground surface adjacent to/parallel to Sixth Street and sampling location S-BSIDE-02 (lead at 401 mg/kg) below ground surface near Sixth Street (EDMS ID: 13574780). Due to the location of these two elevated lead detections, it is not technically feasible to conduct further soil removal due to the potential to adversely affect the stability of the adjacent roadway (Sixth Street) and associated infrastructure. In consideration of this limitation, a NFA-ATT is being granted on the basis of technical impracticability. To address the presence of elevated lead at these two locations, a conveyance notice has been filed with the Orleans Parish Clerk of Court (EDMS ID: 13729384). In accordance with LAC 33:1. Chapter 13, if land use is going to be changed from industrial to non-industrial, the responsible party shall notify the LDEQ within thirty (30) days and the information shall be reevaluated to determine if conditions are appropriate for the proposed land use. Future use may dictate additional investigation and/or remedial activities.

An inspection of the site was performed on March 02, 2023 confirming that no investigation-derived waste remains on site.

Soil removed from the AOI shall comply with *LAC 33 Chapter 11, Solid Waste Beneficial Use and Soil Reuse*, or shall be disposed at a permitted disposal facility.

The impacted media, constituents of concern, remaining constituent concentration represented in soil by the AOIC and site-specific limiting RECAP standards established for this AOI are listed in the following table:

Medium	Constituent of Concern	Soil AOIC	Basis of AOIC	Limiting RS	Basis of LRS	Management Option
Soil 0'-15'	Lead	440 mg/kg ¹	Maximum	400 mg/kg	Soil _{ni}	MO-1
Soil 0'-15'	Benzo[a]anthracene	0.49 mg/kg ²	Maximum	0.62 mg/kg	Soil _{ni}	MO-1
Soil 0'-15'	Benzo[a]pyrene	0.196 mg/kg ²	95%UCL-AM	0.33 mg/kg	Soil _{ni}	MO-1
Soil 0'-15'	Benzo[b]fluoranthene	0.51 mg/kg ²	Maximum	0.62 mg/kg	Soil _{ni}	MO-1

¹Confirmatory sample No. S-ASIDE-01 located on the northeast side wall of the excavation running parallel to Sixth Street (EDMS ID: 13574780); a conveyance notice has been filed on this property (EDMS ID: 13729384).

²EDMS ID: 12582820

Additional information on the details of the investigation and evaluation of this AOI may be obtained from LDEQ's Public Records Center located in the Galvez Building, Room 127, 602 N. Fifth Street, Baton Rouge, LA 70802. Additional information regarding the Public Records may be obtained by calling (225) 219-3168 or by emailing publicrecords@la.gov

JOHN BEL EDWARDS
GOVERNOR



CHUCK CARR BROWN, Ph.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL ASSESSMENT

June 28, 2019

Ms. Erika Boerr
City of New Orleans
Capital Projects Administration
1300 Perdido Street, Suite 6E15
New Orleans, Louisiana 70112

RE: Corrective Action Work Plan Approval
Former Saratoga Street; **AI Number (44056)**
2943 South Saratoga Street
New Orleans, Orleans Parish, Louisiana

Dear Ms. Boerr:

The Louisiana Department of Environmental Quality – Remediation Division (LDEQ-RD) has completed our review of your submittal of April 25, 2019 entitled Corrective Action Plan.

The Plan is hereby approved and may be implemented as proposed.

You now have sixty (60) calendar days from the date of this approval to implement your Corrective Action Plan.

Please notify this office at least 5 calendar days in advance of the initiation of field activities to allow for field oversight. Please contact the team leader, Regina Philson, at (225) 219-3697 with any questions.

Former Saratoga Street Incinerator
Page 2
June 28, 2019

All correspondence must include the **AI number** and be submitted in triplicate to:

Percy V. Harris, Administrator
Remediation Division
P.O. Box 4314
Baton Rouge, LA 70821-4314

Thank you for your cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read "Edwin Akujobi". The signature is written in a cursive, flowing style.

Edwin Akujobi, Environmental Scientist Manager
Remediation Division

/rap

c: Imaging Operations – IAS
Emily Reeves, Leaf Environmental, LLC



State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

OCT 03 2019

Ms. Erika Boerr, Senior Project Manager
City Of New Orleans
1300 Perdido Street, Suite 6E15
New Orleans, LA 70112

Re: Request for Letter of No Objection
Drainage Upgrades and Green Infrastructure
Orleans Parish

Dear Ms. Boerr:

The Louisiana Department of Environmental Quality (LDEQ), Waste Permits Division, has completed review of the Solid Waste Management Plan for the Broadmoor Drainage Upgrades and Green Infrastructure projects listed in the email dated July 09, 2019, submitted on behalf of the City of New Orleans Capital Projects Administration.

Based on the information provided, the LDEQ has no objection to the plan with the following condition.

- Only soil with sample results below the RECAP Screening Standards for non-industrial use may be taken to a Construction & Demolition (C&D) Waste landfill, for use as cover material.

If you have any questions, please contact Martin Perilloux of the Waste Permits Division at (225) 219-3050

Sincerely,

A handwritten signature in black ink, appearing to read "Elliott Vega".

Elliott Vega
Assistant Secretary
Office of Environmental Services

mp

From: Emily Reeves
Sent: Tuesday, July 9, 2019 11:30 AM
To: ellott.vega2@la.gov
Cc: Wayne Desselle <Wayne.Desselle@LA.GOV>; Erika Boerr <eboerr@nola.gov>; Rodney A. Dionisio <radionisio@nola.gov>; Claire Renault <ClaireRenault@leaaf.com>; Holly Johnston <holly@leaaf.com>
Subject: City of New Orleans, Drainage Upgrades and Green Infrastructure project

Mr. Vega,

Leaaf Environmental, LLC is working with the City of New Orleans Capital Projects Administration on the Broadmoor Drainage Upgrades and Green Infrastructure project throughout New Orleans. As part of this project, several playgrounds and other City owned properties will be redeveloped with subsurface green infrastructure utilities following FEMA's Hazard Mitigation Grant Program guidelines. This work involves the excavation and disposal of soil from each playground/property. Several of these playgrounds have been previously investigated and mitigated for lead contamination in near-surface soil, as needed based on HUD guidelines. The playgrounds/properties planned for redevelopment are listed below:

- Al Davis Playground, 2600 LaSalle Street
- Taylor Playground, 2600 S Roman Street (AI# 140760)
- Clay Square/Burke Playground, 2524 Annunciation Street (AI# 178008)
- Annunciation Square, 800 Race Street (AI# 178014)
- Van McMurray Playground, 2000 Phillip Street (AI# 178007)
- Stormwater Lot 2, 3621-3623 3rd Street
- Stormwater Lot 6, 3200 Jackson Avenue
- Coliseum Street Site (residential side)

Similar to the work that Leaaf performed at Easton Park, in order to facilitate disposal of the excavation soil during construction, Leaaf will collect samples from each property. The sampling protocol will include sampling for Lead and PAHs in soil based on similar properties in the area with suspect fill material. In addition, samples will be collected to evaluate the impact any adjoining properties may have caused on the playground/properties based on the adjoining property current or historical use (i.e. adjoining gas stations). Samples will also be collected for TCLP analysis as required for landfill profiling. Please note that this sampling effort is being conducted for soil characterization to determine final disposition and landfill compatibility only. Soil with sample results below the RECAP Screening Standards for industrial use will be handled and disposed as C&D waste. Soil with sample results greater than the RECAP Screening Standards for industrial land use will be disposed at a Subtitle D Landfill.

The intention of this sampling is to handle the soil under the solid waste regulations and not to perform a risk assessment under RECAP.

Please let me know if this plan is acceptable to you and if you require additional information. Leaaf and City representatives can also be available to meet with you to discuss the specifics.

Thanks,

Emily Reeves, MSPH
Sr. Environmental Scientist
Leaaf Environmental, LLC

Leaaf



office (504) 342-2687 | **fax** (504) 342-2715

address 812 Rupp Street, Gretna, LA 70053

www.leaaf.com

The contents of this e-mail and its attachments are intended solely for the addressee(s). In addition, this e-mail transmission may be confidential and it may be subject to privilege protecting communications between Leaaf and their clients. If you are not the named addressee, or if this message has been addressed to you in error, you are directed not to read, disclose, reproduce, distribute, disseminate or otherwise use this transmission. Delivery of this message to any person other than the intended recipient(s) is not intended in any way to waive privilege or confidentiality. If you have received this transmission in error, please alert the sender by reply e-mail.

**Appendix E: Eight step Planning Process for
Floodplains and Wetlands**

EXECUTIVE ORDER 11988/11990

FLOODPLAIN MANAGEMENT/WETLANDS – CHECKLIST (44 CFR Part 9)

APPLICANT:	City of New Orleans (CNO)
COUNTY/STATE:	Orleans Parish/Louisiana
COORDINATES:	Center Coordinates 29.936701, -90.08804
PROPOSED ACTION:	<p>The DPS 01 Watershed Drainage Upgrades and Green Infrastructure project is a two-phased implementation approach to reduce flooding, particularly in the Broadmoor and Central City neighborhoods, and to implement green infrastructure (GI) features in the stormwater drainage system to reduce runoff and create and enhance public landscape and park amenities. This would be accomplished by upgrading the City's stormwater drainage infrastructure with green storage, infiltration, and filtration landscape features along with pipe and street upgrades. Storage would be added throughout the system to create a cascading effect that stores and detains runoff. The Project also includes water and sewer improvements that are impacted by the stormwater improvements. The following are specific components of the project:</p> <ul style="list-style-type: none">• Six (6) stormwater parks• Two (2) stormwater lots• Eight (8) stormwater drainage (pipe) upgrades associated with stormwater parks• Eight (8) green intersections with street basins and eight (8) pervious crosswalks• Pervious pavement along three (3) blocks of Annunciation Street• Road reconfigurations with bioswales

APPLICABILITY: Actions which have the potential to affect floodplains/wetlands or their occupants, or which are subject to potential harm by location in floodplains/wetlands.

YES NO

The proposed action could potentially adversely affect the floodplain/wetlands.

Remarks: Project is meant to drain and store water to reduce surface street flooding which would not affect the floodplain.

YES NO

The proposed action could potentially be adversely affected by the floodplain/wetlands.

Remarks:

ACTION:

- Review against 500 Year floodplain (for Critical Action)
- Review against 100 Year floodplain

Not Applicable (for actions located in wetland only)

STEP NO. 1 Determine whether the proposed action is located in the 100-year floodplain (500-year floodplain for critical actions) and/or wetland; (44 CFR §9.7).

Per Effective DFIRM Panel Numbers 22071C0228F, 22071C0229F, and 22071C0237F, dated September 30, 2016, the Study Area is located within zones X-reduced flood risk due to levee, AE EL -2, AE EL -1, AE EL 0, AE EL 1, and AE EL 3. All AE zones are special flood hazard areas (SFHAs) within the 100-year floodplain.

STEP NO. 2 Notify the public at the earliest possible time of the intent to carry out an action in a floodplain/wetland, and involve the affected and interested public in the decision-making process; (44 CFR §9.8)

Notice was provided as part of a disaster cumulative notice:

Newspaper: A cumulative public notice concerning the Hazard Mitigation Grant Program (HMGP) Assistance in floodplain and wetland areas was published in the New Orleans Times Picayune, Baton Rouge Advocate, Lafayette Daily Advertiser, Lake Charles American Press, Hammond Star, Monroe News-Star, Shreveport Times, and the Alexandria Daily Town Talk.

Date: 11/7/2005 to 11/9/2005

Project Specific Notice (e.g. EA, newspaper, public meeting, etc.):

Type of Public Notice:

Date:

STEP NO. 3 Identify and evaluate practicable alternatives to locating the proposed action in a floodplain/wetland (including alternatives sites, actions and the "no action" option). (44 CFR §9.9)

Alternative Options

YES NO

Is there a practicable alternative site location outside of the floodplain/wetland?

If yes, provide the site location:

YES NO

Is there a practicable alternative action outside of the floodplain/wetland that will not affect the floodplain/wetland?

If yes, describe the alternative action:

YES NO

Is the NO Action alternative the most practicable alternative?

If a practicable alternative exists outside the floodplain/wetland, FEMA must locate the action at the alternative site.

REMARKS: Implementation of the Proposed Action would reduce flooding in areas adjacent to the actual projects and restore floodplain values by creating water storage and recharging areas. Under the Proposed Action, some beneficial effects to the floodplain may be experienced, including reduced flood damages and

reduced contaminants. Impacts on the nature of the floodplain itself have been determined to be negligible, since the purpose is to lower the impacts from regular and frequent flooding events by improving upstream storage, including the use of green infrastructure interventions. This Alternative would effectively lower the floodplain elevation and allow the floodplain to function more efficiently and would reduce hazardous flooding and contaminants in the floodplain. Other Alternatives that were evaluated were elevation of homes within the project area. While there are extensive efforts to use other federal funding to elevate homes within Orleans Parish; however, this project provides greater benefits to more residents, commercial properties and infrastructure within the benefit area than if elevating individual properties.

STEP NO. 4 Identify the potential direct and indirect impacts associated with the occupancy or modification of floodplains/wetlands and the potential direct and indirect support of floodplain/wetlands development that could result from the proposed action; (44 CFR §9.10)

YES **NO**

Is the proposed action in compliance with the NFIP (see 44 CFR Part 59 seq.)?

N/A Remarks:

YES **NO**

Does the proposed action increase the risk of flood loss?

YES **NO**

Will the proposed action result in an increased base discharge or increase the flood hazard potential to other properties or structures?

YES **NO**

Does the proposed action minimize the impact of floods on human health, safety and welfare?

YES **NO**

Will the proposed action induce future growth and development, which will potentially adversely affect the floodplain/wetland?

YES **NO**

Does the proposed action involve dredging and/or filling of a floodplain/wetlands?

YES **NO**

Will the proposed action result in the discharge of pollutants into the floodplain/wetlands?

YES **NO**

Does the proposed action avoid long and short-term adverse impacts associated with the occupancy and modification of floodplains/wetlands?

N/A Remarks:

YES **NO**

Will the proposed action result in any indirect impacts that will affect the natural values and functions of floodplains/wetlands?

YES **NO**

Will the proposed action forego an opportunity to restore the natural and beneficial values served by floodplains/wetlands?

N/A Remarks:

YES **NO**

Does the proposed action restore and/or preserve the natural and beneficial values served by floodplains/wetlands?

N/A Remarks:

YES NO

Will the proposed action result in an increase to the useful life of a structure or facility?

REMARKS: See Section 5.9 of the City of New Orleans DPS 01 Watershed Drainage Upgrades and Green Infrastructure Project HMGP 1603-0426 for a detailed analysis for the impacts and mitigation efforts for this project.

STEP NO. 5

Minimize the potential adverse impacts and support to or within floodplains/wetlands to be identified under Step 4, restore and preserve the natural and beneficial values served by floodplains/wetlands; (44 CFR §9.11)

YES NO

Were flood hazard reduction techniques applied to the proposed action to minimize the flood impacts if site location is in the 100- or 500-Year floodplain/wetlands?

N/A Remarks:

YES NO

Were avoidance and minimization measures applied to the proposed action to minimize the short and long term impacts on the 100-Year floodplain/wetlands?

If no, identify measures required as a condition of the grant:

N/A Remarks: project is to mitigate flood damages

YES NO

Were measures implemented to restore and preserve the natural and beneficial values of the floodplain/wetlands. If no, identify measures required as a condition of the grant:

N/A Remarks:

YES NO

Is new construction or substantial improvement in a floodway, and new construction in a coastal high hazard area proposed?

If YES: Is the activity considered as functionally dependent use or a structure or facility which facilitates an open space use?

YES NO

STEP NO. 6

Reevaluate the proposed action to determine first, if it is still practicable in light of its exposure to flood hazards, the extent to which it will aggravate the hazards to others, and its potential to disrupt floodplain/wetlands values and second, if alternatives preliminarily rejected at Step 3 are practicable in light of the information gained in Steps 4 and 5. (44 CFR §9.9)

YES NO

The action is still practicable at a floodplain/wetland site in light of the exposure to flood risk and ensuing disruption of natural values;

YES NO

The floodplain/wetlands site is the only practicable alternative.

YES NO

There is no potential for limiting the action to increase the practicability of previously rejected non-floodplain/wetlands sites and alternative actions.

YES **NO** Minimization of harm to or within the floodplain/wetlands can be achieved using all practicable means.

YES **NO** The action in a floodplain/wetland clearly outweighs the requirement of E.O. 11988/11990.

FEMA shall not act in a floodplain/wetland unless it is the only practicable location.

STEP NO. 7

Prepare and provide the public with a finding and public explanation of any final decision that the floodplain/wetland is the only practicable alternative; and (44 CFR §9.12)

- Check if the Initial Public Notice serves as the Final Public Notice or a Cumulative Public Notice was published. No condition required.
- Check if the condition was added to the REC indicating that "For actions located in the floodplain and/or wetlands, the applicant must issue a final public notice per 44 CFR Part 9.12(e) at least 15 days prior to the start of work. The final notice shall include the following: (1) A statement of why the proposed action must be located in an area affecting or affected by a floodplain or a wetland; (2) A description of all significant facts considered in making this determination; (3) A list of the alternatives considered; (4) A statement indicating whether the action conforms to applicable state and local floodplain protection standards; (5) A statement indicating how the action affects or is affected by the floodplain and/or wetland, and how mitigation is to be achieved; (6) Identification of the responsible official or organization for implementation and monitoring of the proposed action, and from whom further information can be obtained; and (7) A map of the area or a statement that such map is available for public inspection, including the location at which such map may be inspected and a telephone number to call for information."
- EA Notice of Availability will serve as the Final Public Notice

The public notice of availability for the draft EA is published in the The Advocate-New Orleans Edition, for three (3) days on Wednesday, December 6, 2023, Tuesday, December 12, 2023, and Saturday, December 16, 2023; and in The Times Picayune for five (5) days on Sunday, December 10, 2023, Thursday, December 14, 2023, Monday, December 18, 2023, Thursday, December 21, 2023, and Wednesday, December 27, 2023. Additionally, the draft EA is available for review at the following locations: City of New Orleans City Hall, at 1300 Perdido St., New Orleans, LA – Mondays through Fridays 8:00am to 5:00pm; and the Rosa F. Keller Library and Community Center, at 4300 S. Broad St., New Orleans, LA – Mondays through Thursdays 10:00am to 7:00pm; and Fridays and Saturdays 10:00am to 5:00pm. The document can also be downloaded from FEMA's website at <https://www.fema.gov/emergency-managers/practitioners/environmental-historic/nepa-repository>, or accessed from the City of New Orleans website at <https://nola.gov/next/home/>, or the City of New Orleans Procurement Office LinkedIn website at <https://www.linkedin.com/showcase/the-city-of-new-orleans-procurement-office/>. There is a 30-day comment period beginning on December 6, 2023, and concluding on January 8, 2024 at 4:00pm.

STEP NO. 8

Review the implementation and post - implementation phases of the proposed action to ensure that the requirements stated in Section

9.11 are fully implemented. Oversight responsibility shall be integrated into existing processes. (44 CFR §9.11)

YES NO

Was Grant conditioned on review of implementation and post-implementation phases to ensure compliance of EO 11988?

Failure to comply with conditions enumerated in the Record of Environmental Consideration may jeopardize federal funding.

Due to a poor scan of the original letter, the Floodplain Administrator letter of support from Jerome Landry to FEMA on May 1st, 2017 is being recreated for accessibility. What follows is the body of the original letter verbatim:

To whom it may concern:

The City of New Orleans Department of Safety and Permits Office of Coastal and Floodplain Management have reviewed the eight proposed HMGP Green Infrastructure Projects described as:

“Green infrastructure strategy include the use of streetscape enhancements on streets that run perpendicular so the slope of the land and the stormwater flow, as well as the strategically located City-owned/controlled vacant properties or parks, to intercept and hold stormwater before it enters the subsurface drainage system. Various combinations of green infrastructure strategies will depend on the use and configuration of the chosen streets and properties. Some examples may include:

- *Large retention/detention basins, which collect and hold stormwater from nearby streets and properties and can serve as small public parks during non-storm times,*
- *Street basins, which function as temporary subsurface stormwater detention areas by collecting and storing stormwater before it enters the subsurface pipe system, and*
- *Streetside bioswales, which slow water down and direct the water toward soil and root systems,*
- *Public art features that retain/detain stormwater and educate the public by having them engage with managed water*

The intent of the design effort will be to identify strategies that will increase the level of flood production while considering the hydraulics of the current subsurface system in both upstream and downstream areas, as well as the hydrological mechanics of upstream runoff and appropriate green infrastructure interventions.”

After our review, we have determined that the proposed work will be in compliance with Chapter 78 of the City of New Orleans Code of Ordinances, The Flood Damage Prevention Ordinance. For further details or information please email jlandry@nola.gov.

Thank you

Respectfully,

Jerome Landry

DEPARTMENT OF SAFETY AND PERMITS
BUILDING INSPECTION DIVISION
CITY OF NEW ORLEANS

Mitchell J. Landrieu
Mayor

Jared Munster
Director

5/1/17

Re: HMGP Green Infrastructure Projects

To whom it may concern:

The City of New Orleans Department of Safety and Permits Office of Coastal and Floodplain Management have reviewed the eight proposed HMGP Green Infrastructure Projects described as:

"Green infrastructure strategy include the use of streetscape enhancements on streets that run perpendicular to the slope of the land and the stormwater flow, as well as strategically located City-owned/controlled vacant properties or parks, to intercept and hold stormwater before it enters the subsurface drainage system. Various combinations of green infrastructure strategies will depend on the size and configuration of the chosen streets and properties. Some examples may include:

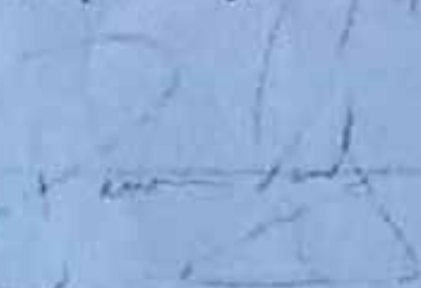
- Lawn retention/detention basins, which collect and hold stormwater from nearby streets and properties and can serve as small public parks during non-storm times.
- Street basins, which function as temporary subsurface stormwater detention areas by collecting and storing stormwater before it enters the subsurface pipe system, and
- Streetside bioswales, which slow water down and direct the water toward soil and root systems.
- Public art features that retain/detain stormwater and educate the public by having them engage with managed water

The intent of the design effort will be to identify strategies that will increase the level of flood protection while considering the hydraulics of the current subsurface system in both upstream and downstream areas, as well as the hydrological mechanics of upstream runoff and appropriate green infrastructure interventions."

After our review, we have determined that the proposed work will be in compliance with Chapter 78 of the City of New Orleans Code of Ordinances, The Flood Damage Prevention Ordinance. For further details or information please email jlandry@nola.gov.

Thank you

Respectfully,



Jerome Landry

From: [Grayson Fleming](#)
To: [Martinez, Amber](#)
Subject: FW: Floodplain Administrator Letter
Date: Thursday, May 18, 2017 1:02:38 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

Please see the email traffic below for your records.



Grayson Fleming

Project Manager Supervisor

Department of Public Works

City Hall | [1300 Perdido Street | Rm 6w03](#) | New Orleans, LA 70112

Phone: 504.658.8065 | Mobile: [504.657.9939](#) | Fax 504.658.8018

Email: grfleming@nola.gov



Connect with Us:



From: Grayson Fleming
Sent: Tuesday, April 25, 2017 1:54 PM
To: Jerome A. Landry <jlandry@nola.gov>
Subject: RE: Floodplain Administrator Letter

Hi Jerome,

Thanks for getting back to me. The scope of work for the HMGP projects (8 total) is generally the same though the projects will occur throughout various neighborhoods within Orleans Parish. Below is the SOW. I look forward to your response.

“Green infrastructure strategy include the use of streetscape enhancements on streets that run perpendicular to the slope of the land and the stormwater flow, as well as strategically located City-owned/controlled vacant properties or parks, to intercept and hold stormwater before it enters the subsurface drainage system. Various combinations of green infrastructure strategies will depend on the size and configuration of the chosen streets and properties. Some examples may include:

- Large retention/detention basins, which collect and hold stormwater from nearby streets and properties and can serve as small public parks during non-storm times,

- Street basins, which function as temporary subsurface stormwater detention areas by collecting and storing stormwater before it enters the subsurface pipe system, and
- Streetside bioswales, which slow water down and direct the water toward soil and root systems,
- Public art features that retain/detain stormwater and educate the public by having them engage with managed water.

The intent of the design effort will be to identify strategies that will increase the level of flood protection while considering the hydraulics of the current subsurface system in both upstream and downstream areas, as well as the hydrological mechanics of upstream runoff and appropriate green infrastructure interventions.”

Respectfully,

Grayson



Grayson Fleming

Project Manager Supervisor

Department of Public Works

City Hall | [1300 Perdido Street | Rm 6w03](#) | New Orleans, LA 70112

Phone: 504.658.8065 | Mobile: [504.657.9939](#) | Fax 504.658.8018

Email: grfleming@nola.gov



Connect with Us:



From: Jerome A. Landry

Sent: Tuesday, April 25, 2017 10:28 AM

To: Grayson Fleming <grfleming@nola.gov>

Subject: RE: Floodplain Administrator Letter

Hello Grayson, sorry for the delayed response I have been out unexpectedly. Can you forward the SOW? I will review it and I will let you know if I need anything else to determine impact and issue letter.

Thank you. Welcome to the City I hope you enjoy working here.

With Respect,

Jerome Landry

----- Original message -----

From: Grayson Fleming <grfleming@nola.gov>

Date: 4/20/17 8:53 AM (GMT-06:00)

To: "Jerome A. Landry" <jlandry@nola.gov>

Cc: "Jennifer E. Ruley" <jeruley@nola.gov>

Subject: FW: Floodplain Administrator Letter

Jerome,

I recently started working at DPW. I'll be working on special projects that includes some Capital Projects input. DPW manages the Hazard Mitigation Grant Program. HMGP includes Green Infrastructure projects throughout Orleans Parish. Would you please review the HMGP program to determine impact on local topography to determine if we are in compliance with Floodplain Ordinance, Chapter 78.

Please let me know what information I need to provide you. I assume you'll need the SOW.

Attached is the letter provided for DPW & S&WB JIRR. I need a document like this for HMGP.

Thank you for your help.

Respectfully,

Grayson



Grayson Fleming

Project Manager Supervisor

Department of Public Works

City Hall | [1300 Perdido Street | Rm 6w03](#) | New Orleans, LA 70112

Phone: 504.658.8065 | Mobile: [504.657.9939](tel:504.657.9939) | Fax 504.658.8018

Email: grfleming@nola.gov



Connect with Us:



Appendix F: Permits

Attachment #2

Correspondence with Resource Agencies
and Coastal Use Permit Determination

Permit Number: P20190004

<u>Office</u>	<u>Commentor</u>	<u>Comment Date</u>	<u>Comment</u>
Other	CAPTURE	05/13/2019 15:16:10	6390257 - INTERNAL COMMENTS - CODE SHEETS
State Land	Lawrence "Les" Rosso, Jr.	05/13/2019 14:05:45	No Objection.
OCM	VICKIE AMEDEE	05/10/2019 07:04:03	P20190004 Processing Complete.pdf
LDWF	Dave Butler LDWF	05/09/2019 07:27:54	Ecological Studies comments remain the same.
OCM	VICKIE AMEDEE	05/08/2019 09:22:46	Hydrologic Modification Impact Analysis - the proposed project will not result in surface water run off; therefore, impacts to surface waters are not anticipated.
OCM	VICKIE AMEDEE	02/13/2019 06:58:26	P20190004 Status Update 02 12 2019.pdf
LDWF	Dave Butler LDWF	01/14/2019 09:54:34	It is anticipated that the proposed activity will have minimal or no long-term adverse impacts to wetland functions and, therefore, we have no objection.
State Land	Lawrence "Les" Rosso, Jr.	01/10/2019 11:26:41	No Objection.
Other	CAPTURE	01/10/2019 11:06:07	6296140 - NEEDS / ALTERNATIVES REVIEW -
Other	Travis Johnson - CPRA	01/08/2019 09:12:29	CPRA has no objection to the issuance of CUP# P20190004 as it impacts PO-0057, Project Name: HSDRRS, provided that DNR condition the authorization as follows: "The applicant must submit for and receive a Levee Permit/Letter of No Objection from the CPRA, the United States Army Corps of Engineers and the Orleans Levee District prior to commencement of the activity."

Close

Coastal Use Permit Application Impact Calculations Form

Permit Number: P20190004

In the space provided below (attach additional sheets if more space is needed), identify each type of habitat impacted and calculate the disturbed area (in acres to the nearest hundredth) that will result from the proposed activity for each habitat impacted. Provide a sketch with dimensions and calculations showing how disturbed area figure was derived.

1. Pre-application meeting? No Yes Date _____

Disturbed Area N/A

2. Disturbed area in original application UU = 1,584.24 ac.

Area for watershed drainage upgrades – approx. 1,584.24 ac.



3. Disturbed area as finally issued Same as No. 2

See No. 2



State of Louisiana
DEPARTMENT OF NATURAL RESOURCES
OFFICE OF COASTAL MANAGEMENT

05/09/2019

CDM SMITH
1515 POYDRAS STREET 1000
NEW ORLEANS, LA 70112
Attn: Robert Haydel

**RE: P20190004, Request for Determination
CDM SMITH**

Description: Drainage and street improvements within the Central City, Garden District, Irish Channel, St. Thomas, and Lower Garden District neighborhoods of New Orleans. The project does not alter any pump stations, does not perform work outside of the levee system, and will not increase stormwater discharge.

Location: Lat. 29° 56' 00.22"N, Long. 90° 04' 09.62"W; various locations throughout the stated neighborhoods New Orleans, 70113
Orleans Parish, LA

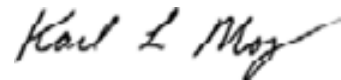
Dear Robert Haydel:

We have received a Request for Determination for the above referenced project, which has been found to be inside the Louisiana Coastal Zone. In accordance with the State and Local Coastal Resources Management Act of 1978, as amended (La. R.S. 49:214.34.a), the proposed activity is exempt and a Coastal Use Permit is not required.

This determination is valid for two (2) years from the date of this letter. If the proposed activity is not initiated within this 2-year period, this determination will expire and the applicant will be required to submit a new application. This determination does not eliminate the need to obtain a permit from the United States Army, Corps of Engineers (USACE) or any other Federal, state, or local approval, that may be required by law.

This determination has been made on the basis of information provided by your application. If it is later established that you furnished erroneous data, you may be directed to alter or modify your plans, to remove structures you have installed, and/or to restore the work area to pre-project conditions at your own expense. If it is established that you knowingly furnished erroneous data, you could also be subject to legal action.

The drawings submitted with your referenced application are attached hereto and made a part of the record. If you have any questions regarding this authorization, please contact our office at (225) 342-7591 or (800) 267-4019.

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/va

Attachments

Final Plats:

1) [P20190004](#) [Final Plats](#) [05/08/2019](#)

cc: Martin Mayer, COE w/plats
Dave Butler, LDWF w/plats
Jordan Cobbs, OCM w/plats
Coastal Protection and Restoration Authority, CPRA w/plats
Craig Leblanc, Frank Cole, CMD/FI w/plats
Orleans Parish w/plats

CDM SMITH w/plats



Permit Number: OL2019-00026

Submit Date: 2/20/2019

Applicant's Information

Name: Erika Boerr

Address: 1300 Perdido Street, Suite 6E15, New Orleans 70112

Phone Number: 504-658-8475

Email Address: eboerr@nola.gov

Authorized Agent's Information

Name: Robert Haydel

Company: CDM Smith

Address: 1515 Poydras Street, Suite 1000, New Orleans 70112

Phone Number: 504-799-1133

Email Address: Haydelr@cdmsmith.com

Statement of Authorization

I hereby authorize, Robert Haydel, to act in my behalf as my agent in the processing of this application and to furnish, upon request, supplemental information in support of this permit application.

Applicant Signature Date: 2/19/2019

Project Details

Project Name & Location

Project name or title: DPS 01 Watershed Drainage Upgrades and Green Infrastructure Project

Name of levee system (if known): Mississippi River Levee Wall (Flood Protection Authority East)

Latitude: 29.931865

Longitude: -90.066048

Levee Station (if known):

Offset: 30

Levee Location Type: Protected Side

Street Intersection Address: Philip Street and Tchoupitoulas (The intersection stated is the nearest to the flood protection wall)

Section: Central City, Garden District, Irish Channel, St. Thomas, and Lower Garden District neighborhoods

Township: Orleans Parish

Range:

Project Description



Nature of Activity (Project description, include all features): The project will improve drainage capabilities by increasing drainage efficiency, introducing stormwater storage areas, and increasing infiltration capabilities. The project will include green infrastructure designs such as stormwater parks, pervious pavement, bioswales, and street basins. The project will also introduce increased capacity drainage pipes. The construction will also include removal and replacement of asphalt and concrete pavement. The construction will utilize the standard materials included within the New Orleans Department of Public Works (NODPW) Specification for drainage, water, sewer, and pavement projects. Additional structures include modular subsurface storage tanks and No. 2 stone base to increase infiltration ability. Roadways and sidewalks in areas that were selected for drainage improvement will be removed by excavation and other practices that align with NODPW standards. The excavation volume is approximately 157,800 cubic yards. The fill materials will include crushed stone or gravel, hauled in topsoil, and other approved standard fill.

Project Purpose (Describe the reason or purpose of the project): Drainage Pump Station No. 1 watershed includes Central City, Garden District, Irish Channel, St. Thomas, and Lower Garden District neighborhoods. Presently the watershed's drainage system consist of concrete pipes and large culverts conveying stormwater directly to DPS No. 1. Frequently the existing system's capacity is exceeded and local ponding is experienced at various location within the watershed. The project will improve drainage capabilities by in some places by installing larger drainage pipes/culverts, introducing various stormwater storage areas, and increasing infiltration capabilities. The addition of the stated practices will alleviate stormwater pressure at DPS No. 1 and increase drainage efficiency of the surrounding neighborhoods. The project will tentatively require 835 working days which will commence 11/23/19 and complete 3/16/22.

Is any portion of this work already complete? No

Is this a renewal or extension of a previous permit? No

Application Type: Government

Insurance: Yes

Signature(s)

Application is hereby made for permit or permits to authorize the work described in this application. I certify and this information is complete and accurate. I further certify that I possess the authority to undertake the work described herein or am acting as the duly authorized agent of the applicant.

Agent Submission Signature Date: 2/20/2019

Agent Approval Signature Date: 4/20/2020

Permitting Officer Signature Date: 4/21/2020



FLOOD PROTECTION AUTHORITY

Your Flood Defense System

SLFPA-E LEVEE SAFETY PERMIT PROVISIONS

Levee Safety Permit #OL2019-00026 Provisions:

BOARD OF COMMISSIONERS

Herbert I. Miller, P.E., DEE, F. ASCE -
President

Mark L. Morgan, P.E. - Vice President
Clay A. Cosse - Secretary
Quentin D. Dastugue, CCIM - Treasurer
Andrew J. Englande, Jr., Ph.D., P.E., DEE
Lambert J. Hassinger, Jr.
Jason P. Latolais
K. Randall Noel
Herbert T. Weysam, III

CHIEF ADMINISTRATIVE OFFICER

Derek E. Boese, PMP, LEED-AP

EXECUTIVE COUNSEL

Michelle White

EAST JEFFERSON LEVEE DISTRICT

1100 Rev. Richard Wilson Drive
Kenner, LA 70062
504.469.7522

LAKE BORGNE BASIN LEVEE DISTRICT

P.O. Box 216
6136 E. St. Bernard Highway
Violet, LA 70092
504.682.5941

ORLEANS LEVEE DISTRICT

6920 Franklin Ave
New Orleans, LA 70122
504.286.3100

In consideration of the referenced request, the Southeast Louisiana Flood Protection Authority – East (SLFPA-E), on behalf of the Orleans Levee District, does hereby grant permission to CDM Smith on behalf of City of New Orleans Public Works Department (“Permittee”) to improve drainage capabilities by installing storm water parks, pervious pavement, bioswales, and street basins at Central City, Garden District, Irish Channel, St. Thomas, and Lower Garden District neighborhoods, approximately 30-1500 feet landward of the left descending Mississippi River Floodwall, vicinity of second order levee station 339+22, at New Orleans, Louisiana, in Orleans Parish. **No waiver will be granted due to the proximity to the flood protection. All excavations and sub-surface work within 300 feet of the floodwall shall be performed, completed, and backfilled during Mississippi River stages below +11.0 feet on the Carrollton Gage.**

1. A copy of this Levee Safety Permit, along with a set of approved plans shall be kept on the job site for the duration of the Work and made readily available for any inspector to determine that the Work taking place has been permitted by the Southeast Louisiana Flood Protection Authority –East (SLFPA-E), and is being conducted in accordance with approved plans. Failure to do so may result in the revocation of the Levee Safety Permit (“the Permit) or construction delays. The Levee District has the option to reserve its rights to inspect area prior to construction.
2. All work is performed in strict accordance with the provisions set forth in the CPRA’s Letter of No Objection #17715 dated May 9, 2019 and the USACE Letter of No Objection #19-0291 dated March 12, 2020 attached and made a part hereof.
3. No work or related activity shall be conducted within the levee district right-of- way.
4. Should changes in the location or section of the existing levee and/or river, or in the generally prevailing conditions in the vicinity, be required in the future in the public interest, the applicant shall make changes in the project concerned or in the arrangement thereof, as may be necessary to satisfactorily meet the situation and shall bear the cost thereof.
5. This Permit does NOT obviate the Permittee and Contractor from obtaining permits required from any federal, state, and local authorities, or the U.S. Army Corps of Engineers, the State Land Office, the Louisiana Department of Transportation and Development, and/or the Louisiana Department of Natural Resources-Coastal Management Division. Permittee and Contractors are responsible for obtaining all such permits and adhering to their provisions. The SLFPA-E is not responsible for insuring that the Permittee or its Contractor complies with rules, regulations or laws imposed by other governmental entities/agencies in regard to requirements for permitted activities, and does not enforce permits or regulations required by any of those entities. The Permittee is to provide copies of all city, state and federal

permits to the SLFPA-E prior to commencing work.

6. The SLFPA-E will not interpret or provide comments on any local laws, zoning or ordinances concerning property rights, operations, or any other activities governed by any Permit that is not a SLFPA-E Permit.
7. The permission granted under this Permit is being granted to the Permittee and is not transferable to any other person, company or agency.
8. This Permit does not constitute an approval of the engineering design or any opinion as to the feasibility of the Work.
9. The Work shall be constructed in accordance with the submitted details set forth in the Levee Safety Permit Application dated February 18, 2019 by the Permittee, the drawings and specifications accompanying the application, and all other provisions contained herein. This Permit shall automatically expire if construction of the permitted facility has not started within six (6) months of the date of the Permit.
10. Any changes to the limits or scope of the proposed Work must be submitted to SLFPA-E for additional review prior to commencement of work covered by the proposed changes.
11. Construction activities shall be completed within one year of the Permitting Officer's dated signature of this Levee Safety Permit.
12. The Permittee agrees to hold harmless, indemnify, and defend the SLFPA-E and its levee districts, its staff, Commissioners and agents against any and all damages which arise from the activities of the Permittee, or the Permittee's contractors, tenants and or lessees. Additionally, the Permittee, and all contractors and subcontractors employed to complete the Work must provide a completed SLFPA-E hold harmless agreement (attached with application) signed by a legally authorized representative of each contractor and subcontractor. The hold harmless agreement must be signed, sealed and dated by a Notary Public. An original copy of the signed and authorized hold harmless agreement must be delivered to SLFPA-E at the below address. An original proof of authority to sign the hold harmless agreement (such as a copy of a corporate resolution) must also be provided. Contractors and subcontractors that do not comply with this requirement shall not be allowed access to the levee right-of-way.
13. In addition to any other provisions provided herein, Permittee specifically assumes any and all responsibility for property damage to the SLFPAE or any of its levee districts' property, and to personal injury to the any of its officers, agents, servants or employees caused by, resulting from, arising out of or connected with the use of the Premises and/or any buildings and improvements thereon or caused by the activities of Permittee and/or its invitees and/or licensees on the subject property.
14. All contractors and subcontractors employed to complete work in the Right of Way shall provide certificates of insurance as proof of compliance with the SLFPA-E Levee Safety Permit Insurance Requirements, attached and made a part hereof. Contractors that do not comply with this requirement shall not be allowed access to the levee right-of-way. The

following shall be named as certificate holders and the additional insured on general liability, automobile liability, aviation liability and marine insurance:

Southeast Louisiana Flood Protection Authority – East
6920 Franklin Avenue
New Orleans, LA 70122

Failure to provide the appropriate certificates of insurance may result in a revocation of the Permit and/or construction delays.

15. The SLFPA-E permit office shall be given notice in writing at least 3 days (excluding weekends and holidays) prior to commencement of any work, and at the end of activities so that appropriate inspections can be made. The Permittee, contractor, or an authorized representative may send notification via email. However, the entity providing notification is responsible for verifying receipt of notification.
16. The Permittee shall provide the SLFPA-E with photographs of the completed work, which must show the relationship of the work and its relative location to the flood control structure making this Permit necessary.
17. The proposed Work shall not restrict the Levee District's maintenance operations, or any potential flood fighting activities along the levee, nor shall it obstruct or impede drainage, or create areas of standing water on the levee, along the levee toe, or in the levee batture.
18. No equipment, vehicles or materials of any kind may be parked or stored on the levee or its slopes without prior approval from the Levee District.
19. An "after-the-fact" Permit request will be reviewed as though no work had been initiated and any work found not to be acceptable for permitting shall be removed at the Permittee's expense. The Permittee is responsible for maintaining the existing level of flood protection at all times, and shall employ and maintain at the project site suitable erosion protection measures to the satisfaction of the Levee District.
20. The contractor shall preserve and protect all levee monuments and shall install a sleeve and cap at each monument locations to allow access to the monument through the asphalt pavement.
21. Any structural facilities constructed at the flood side of the levee and/or floodwall will be anchored sufficiently so as to resist flotation, collapse or lateral movement in the event of flooding or inundation. Alternatively in lieu of the above-referenced anchorage of installations and facilities they must be capable of immediate removal from the floodway upon request of the U.S. Army Corps of Engineers or the SLFPAE.
22. All materials associated with the proposed Work must be removed from the area upon completion of the project and the area must be returned to its original state of existence or better.

23. Any damage done to the levee, floodwall or other flood control structure, revetment, or surrounding project area, resulting from the proposed Work shall be repaired or replaced by Permittee at the Permittee's expense and to the satisfaction of the Levee District.
24. The Permittee shall provide a set of As-Built Plans to the Southeast Louisiana Flood Protection Authority - East upon completion of the Work.
25. If for any reason the Permittee ceases to maintain operations, the APPLICANT/OWNER must obtain a modification of this Permit, which may require that any or all structures and materials in the area of operation be removed at the Permittee's expense.
26. The SLFPA-E may revoke this Levee Safety Permit if it determines that the provisions contained in this permit are not being met, or if the permitted activity damages the levee system infrastructure.
27. It is further hereby expressly agreed that the obligations of the Permittee under this Permit shall survive the expiration and/or termination of this Permit.
28. FOR CAMPS - Permittee understands that the SLFPA-E, the COE and/or their contractors may need access to the area to perform maintenance. Permittee also understands that because of the maintenance it may not have direct access to the site and may have to temporarily use an alternative route to access its property.

Alanna Bailey-Kelly

From: Cefolia, Madeline M CIV (US) <Madeline.M.Cefolia@usace.army.mil>
Sent: Thursday, March 12, 2020 10:52 AM
To: Chris Humphreys; Donald Jerolleman; Deborah Abu Naser
Cc: CPRArequest@la.gov; Erika Boerr
Subject: Letter of No Objection for CDM Smith on behalf of City of New Orleans Public Works Department 2019-0291
Attachments: E2019-0291.pdf

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Please take this email as our LNO for the project. **No work shall commence until a permit is received from the Levee District.**

This letter of no objection is based upon engineering criteria and potential impacts to the flood risk reduction system only, and no interpretation or comments regarding local drainage or traffic issues, local laws, zoning, or ordinances concerning property rights, etc., have been made. Please be advised that the proposed project may require a Department of the Army (DA) permit under Section 10 of the Rivers and Harbors Act and/or Section 404 of the Clean Water Act. If a DA permit is required, it is the applicant's responsibility to obtain such permit from the New Orleans District Regulatory Branch prior to the commencement of any work. The USACE point of contact in the New Orleans District Regulatory Branch is Mr. Brad Guarisco at 504-862-2274 or Brad.A.Guarisco@usace.army.mil. This letter of no objection does not constitute a response to a Section 404/10 permit application, if required.

Orleans Levee District,

We have received a copy of the email from CDM Smith on behalf of City of New Orleans Public Works Department, dated November 18, 2020, and concerning permission to improve drainage capabilities by installing storm water parks, pervious pavement, bioswales, and street basins at Central City, Garden District, Irish Channel, St. Thomas, and Lower Garden District neighborhoods, approximately 30-1500 feet landward of the left descending Mississippi River Floodwall, vicinity of second order levee station 339+22, at New Orleans, Louisiana, in Orleans Parish.

We have no objection provided:

- a. The work is accomplished in accordance with the above referenced email and accompanying drawings.
- b. All excavations and sub-surface work within 300 feet of the floodwall shall be performed, completed, and backfilled during Mississippi River stages below +11.0 feet on the Carrollton Gage. No waiver will be granted due to the proximity to the flood protection. Information concerning current river stages may be obtained on our website at www.mvn.usace.army.mil <<http://www.mvn.usace.army.mil>>.
- c. All excavations and sub-surface work from 300 feet to 1500 feet of the floodwall shall be performed, completed, and backfill during Mississippi River stages below +15.0 feet on the Carrollton Gage.
- d. Excavations within 300 feet shall be backfilled with clay material or native material (not sand). Permeable materials can only be used as bedding material.
- e. The applicant must provide written notification to this office of the construction timeline to include the proposed start and end dates. Additionally, the applicant must notify this office prior to commencement and upon completion of the work permitted herein.

If you have any questions, please contact me. Additionally, future correspondence concerning this project should reference our Letter of No Objection number 19-0291. This will allow us to more easily locate records of previous correspondence, and thus provide a quicker response.

Thanks,

Madeline M. Cefolia
New Orleans District - CEMVN - ODS-W
U.S. Army Corps of Engineers
7400 Leake Avenue
New Orleans, LA 70118
Office: (504) 862-1630
Madeline.m.cefolia@usace.army.mil

CLASSIFICATION: UNCLASSIFIED



State of Louisiana

May 9, 2019

JOHN BEL EDWARDS
GOVERNOR

Orleans Levee District
6920 Franklin Avenue
New Orleans, LA 70122
Attention: Mr. Stevan G. Spencer

PERMIT REQUEST FORM OF NO OBJECTION

This Letter of No Objection is not a regulatory permit and does not authorize the implementation of any project without documented approval from all appropriate regulatory authorities.

Permit Applicant: City of New Orleans Department of Public Works

Date of Request: 02-18-2019

Agent: CDM Smith

Applicant's Request: Approval to construct the DPS 01 Watershed Drainage Upgrades and Green Infrastructure Project to improve drainage capabilities. Subsurface drainage pipes will be installed to a maximum depth of nine feet. A Stormwater park will be constructed at the intersection of Third Street and Chippewa Street which will require a maximum excavation of 10-feet and the installation of subsurface storage tanks. Green intersections will be constructed at Annunciation Street, St. Thomas Street, and Chippewa Street which will require the installation of subsurface storage tanks and associated drainage. The closest work location will be the installation of manholes, catch basins, and drainage pipes to a max depth of nine feet at the intersection of Phillip Street and Tchoupitoulas Street approximately 50-feet from the floodwall.

Received 2/21/19 via email
Project No. 2015-HMGP-02

Project Location: All work will take place on the protected side of the left-descending Mississippi River Floodwall in New Orleans, Orleans Parish, Louisiana.

Project Coordinates: 29° 55' 54.710" ; -90° 03' 57.770"

The above referenced request has been examined by Coastal Protection and Restoration Authority, and no objection is proffered for this request, provided:

1. All excavations must meet OSHA Standards.
2. This Letter of No Objection is only for stated work within or in the vicinity of the Levee District right-of-way, and must be accomplished in accordance with the details set forth in the applicant's request and the conditions contained herein. Any changes to the limits or scope of the proposed work must be submitted for additional review. The Levee District must be contacted in writing prior to commencement and at the end of activities. The applicant is responsible for obtaining and providing copies of any permits or lease agreements necessary from the U.S. Army Corps of Engineers, the U.S. Coast Guard, the Louisiana State Land Office, the Louisiana Department of Transportation and Development, the Louisiana Department of Natural Resources - Office of Coastal Management, the Louisiana Department of Wildlife and Fisheries, the Parish Government and/or any other applicable agencies, as well as documented approval from the area landowner(s) prior to the initiation of the work. The applicant is responsible for adhering to the provisions of any existing permits. The proposed work must not restrict the Levee District's maintenance operations, or any potential flood fight activities at the levee, nor shall it obstruct or impede drainage, or create areas of standing water on the levee batture. The applicant must employ and maintain suitable erosion protection measures at

the project site to the satisfaction of the Levee District. The applicant or owner must immediately notify the Levee District of any seepage or sand boils that occur during high water conditions. All materials associated with the proposed work must be removed from the area upon completion of the project and the area must be returned to its original state of existence or better. Any damage done to the levee, floodwall or other flood control structure, revetment, or surrounding project area, resulting from the proposed work must be repaired or replaced by the applicant. Should any change in the location of the existing levee, river, floodwall, drainage canal, waterway, or generally prevailing conditions in the vicinity, or should any changes in the area be required in the future, in the public interest, the applicant shall make such changes in the project as necessary. Any required changes or repairs shall be at the applicant expense. This letter of no objection is offered with no opinion or approval of the design or engineering feasibility of the work.

Failure to abide by the conditions and requirements set forth in this Letter of No Objection may constitute non-compliance with the State of Louisiana comprehensive master coastal protection plan and may subject the levee district and/or the applicant/agent to any and all procedures and actions by CPRA or the CPRA Board pursuant to La. R.S. 49:214.5.2(A)(6) and as may be necessary to ensure compliance with such comprehensive master coastal protection plan.

3. That the proposed activities occur and are completed prior to or after high water stages or hurricane conditions such that no operations are conducted at saturated levee systems. Authorization for work periods will be determined at the discretion of the levee district.
4. That all subsurface work is performed and backfilled prior to the Mississippi River attaining or exceeding + 11.0 feet NGVD, on the Carrollton Gage at New Orleans, unless the applicant receives documented approval to the contrary from the U.S. Army Corps of Engineers-New Orleans District.
5. This Letter of No Objection (LNO) is conditioned upon the applicant/agent providing the following to CPRA, USACE, and the levee district, before commencing any activity allowed under the LNO. Final work products deemed necessary for granting of this Letter of No Objection associated with this project shall be stamped (construction ready drawings, designs, reports, as-builts differing significantly from final plans, etc...) by each professional engineer responsible for their relevant field of practice for the project. Failure to provide information requested or failure to abide by the conditions and requirements contained herein shall constitute grounds for rescinding this Letter of No Objection. In such an event, CPRA will provide notice to USACE and the levee district that the LNO has been rescinded.
6. That no equipment, vehicles, or materials of any kind are parked or stored on the levee or on its slopes without prior approval from the levee district.
7. That the work is to be completed according to the recommendations provided in the geotechnical report prepared by The Beta Group on October 11, 2018 and November 19, 2018. If any change is made to these assumptions, it is the responsibility of the applicant to submit this information to CPRA for further review.
8. That no stockpiling of material is allowed on the levee/floodwall system or within 15-feet of the protected side levee toe/floodwall, or within 40-feet of the floodside levee toe/floodwall. Note: The berm is considered part of the levee/floodwall system.
9. That excavated areas are backfilled as expeditiously as possible using clay material whose composition and density equals or exceeds that of areas adjacent to, and along the perimeter of the excavation boundary, or with native material.
10. That the applicant obtains any required documented approval for crossing of a Parish Road from the appropriate Parish Government.

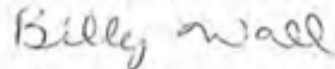
2019-05-09

Page 3

11. That the applicant contact the Department of Transportation & Development Office and obtain any permits that may be required for any operations, work or construction occurring within or adjacent to U.S. or Louisiana Highway Right-of-Way. The applicant must adhere to any DOTD District Office requirements imposed for vehicle ramp intersection with the Louisiana Highway right-of-way, as well as for traffic control and safety needs. The appropriate Highway Right-of-Way Permit Contact can be found at the following link:

http://wwwsp.dotd.la.gov/Inside_LaDOTD/Divisions/Engineering/Road_Design/Right-of-Way/Pages/Contacts.aspx
12. That the installation will not damage the floodwall, floodgate, or levee and must not obstruct the operation of these structures.
13. That the applicant installs a monitoring system to detect any movement of the floodwall (prior to excavation) and submits the reading to the levee district. Any movement of the floodwall must be reported to the levee district immediately.
14. That the applicant is responsible for maintaining the existing level of flood protection at all times to the satisfaction of the levee district.

Yours very truly,



for Ignacio Harrouch, Operations Division Chief
Coastal Protection and Restoration Authority of Louisiana

17715/bw/ar/rd

cc:

Dabunaser@Floodauthority.Org
U.S. Army Corps Of Engineers-Levees
Mr. Billy Wall

Appendix G: Public Notice and Draft FONSI

**FEMA PUBLIC NOTICE OF AVAILABILITY FOR THE
DRAFT ENVIRONMENTAL ASSESSMENT AND
DRAFT FINDING OF NO SIGNIFICANT IMPACT FOR
THE CITY OF NEW ORLEANS DPS 01 WATERSHED DRAINAGE UPGRADES AND
GREEN INFRASTRUCTURE PROJECT FOR BROADMOOR, CENTRAL CITY,
GARDEN DISTRICT, LOWER GARDEN DISTRICT, IRISH CHANNEL, ST. THOMAS
DEVELOPMENT, TOURO, EAST RIVERSIDE, AND MILAN**

Interested parties are hereby notified that the Federal Emergency Management Agency (FEMA) has prepared a draft Environmental Assessment (EA) and draft Finding of No Significant Impact (FONSI) for the proposed Limited Build-Out Alternative to improve stormwater drainage, increase floodplain storage capacity, and mitigate hazards and damages from local flooding of homes and businesses. The project area covers approximately 1,546 acres within the City of New Orleans. It is generally bounded by South Broad Street and Toledano Street to the northwest, Martin Luther King, Jr. Boulevard and South Broad Street to the northeast, Melpomene Street and Tchoupitoulas Street to the southeast, and Toledano Street and Tchoupitoulas Street to the southwest along the Mississippi. The proposed project is a two-phased implementation approach to reduce flooding, implementing green infrastructure features in the stormwater drainage system to reduce runoff and create and enhance public landscape and park amenities. The sub-recipient, City of New Orleans, seeks federal grant funds for this action eligible under a Presidential Disaster Declaration, signed on August 29, 2005 (FEMA-1603-DR-LA).

The primary purpose of this project is to improve stormwater drainage, increase floodplain storage capacity, and mitigate hazards and damages from local flooding of homes and businesses. The project area has been subject to repetitive, significant flood events causing damage to residential and commercial properties. The alternatives considered include: 1) the No Action Alternative; 2) Full Build-Out Alternative; and 3) Limited Build-Out Alternative (Proposed Action). Neighborhoods in the DPS 01 Watershed Study Area include Broadmoor, Central City, Garden District, Lower Garden District, Irish Channel, St. Thomas Development, Touro, East Riverside, and Milan.

A draft Environmental Assessment (EA) has been prepared in accordance with FEMA Instruction 108-1-1 and DHS Instruction 023-01-001-01, pursuant to Section 102 of the National Environmental Policy Act of 1969 (NEPA), as implemented by Title 40 of the Code of Federal Regulations [CFR], Parts 1500-1508 (40 CFR 1500-1508), promulgated by the President's Council on Environmental Quality (CEQ). The purpose of the draft EA is to evaluate the potential impacts of the proposed action on the physical and human environment. This draft EA summarizes the purpose and need, affected environment, and potential environmental consequences associated with the proposed action. The draft FONSI is FEMA's finding that the Proposed Action would not have a significant effect on the human and natural environment.

The draft EA and FONSI are available for review at the following locations: City of New Orleans City Hall, at 1300 Perdido Street, New Orleans, LA – Mondays through Fridays 8:00am to 5:00pm; and the Rosa F. Keller Library and Community Center, at 4300 S. Broad Street, New Orleans, LA – Mondays through Thursdays 10:00am to 7:00pm; and Fridays and Saturdays 10:00am to 5:00pm. This public notice will run in The Advocate-New Orleans Edition, for three (3) days on Wednesday, December 6, 2023, Tuesday, December 12, 2023, and Saturday, December 16, 2023;

and in The Times Picayune for five (5) days on Sunday, December 10, 2023, Thursday, December 14, 2023, Monday, December 18, 2023, Thursday, December 21, 2023, and Wednesday, December 27, 2023. The document can also be downloaded from FEMA's website at <https://www.fema.gov/emergency-managers/practitioners/environmental-historic/nepa-repository>, or accessed from the City of New Orleans website at <https://nola.gov/next/home/>, or the City of New Orleans Procurement Office LinkedIn website at <https://www.linkedin.com/showcase/the-city-of-new-orleans-procurement-office/>. There will be a 30-day comment period beginning on Wednesday, December 6, 2023 and concluding on Monday, January 8, 2024 at 4:00pm. Written comments may be mailed to: DEPARTMENT OF HOMELAND SECURITY-FEMA EHP – CNO DPS 01, 1500 MAIN STREET, BATON ROUGE, LOUISIANA, 70802. Comments may be emailed to fema-liro-ehp-hma@fema.dhs.gov.

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 no adverse effects then FEMA would revise the findings and issue a second public notice allowing time for additional comments. However, if no substantive comments are received, the draft EA and associated draft FONSI will become final and this Notice of Availability will also serve as the final Public Notice. Substantive comments will be addressed as appropriate in the final documents.



U.S. Department of Homeland Security
Federal Emergency Management Agency
Region VI
Louisiana Recovery Office
1500 Main Street
Baton Rouge, Louisiana 70802

**DRAFT FINDING OF NO SIGNIFICANT IMPACT
HMGP 1603-0426 CITY OF NEW ORLEANS
DRAINAGE PUMP STATION 01 WATERSHED DRAINAGE UPGRADES AND
GREEN INFRASTRUCTURE PROJECT FOR BROADMOOR, CENTRAL CITY,
GARDEN DISTRICT, LOWER GARDEN DISTRICT, IRISH CHANNEL, ST.
THOMAS DEVELOPMENT, TOURO, EAST RIVERSIDE, AND MILAN
NEIGHBORHOODS
NEW ORLEANS, ORLEANS PARISH, LOUISIANA
*FEMA-1603-DR-LA***

BACKGROUND

Hurricane Katrina, a Category 4 hurricane with a storm surge above normal high tide levels, made landfall near the town of Buras, Louisiana (LA), on August 29, 2005. Maximum sustained winds at landfall were estimated at 140 miles per hour. The accompanying high winds, heavy rains, and flooding caused an accumulation of various types of debris on the streets and rights-of-way (ROW) of the City New Orleans (CNO) (Sub-recipient). Rain accumulation, in combination with debris blockage, saturated soils, and insufficient drainage, caused flooding and standing water in most of Orleans Parish. As a result of this event, the Broadmoor Area has been subject to significant flood events causing damage to residential and commercial properties.

In order to comply with the provisions of the National Environmental Policy Act of 1969 (NEPA) and the President's Council on Environmental Quality (CEQ) regulations implementing NEPA (Title 40 of the Code of Federal Regulations [CFR] (Parts 1500-1508 Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act 2005), an Environmental Assessment (EA), which would encompass the project under review, was developed by the Federal Emergency Management Agency (FEMA).

The Sub-recipient has requested, via the State of Louisiana Governor's Office of Homeland Security and Emergency Preparedness (LA GOHSEP) (Applicant); that FEMA provide disaster assistance through the granting of federal funds under the auspices of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), Public Law (PL) 93-288, as amended. Section 404 of the Stafford Act authorizes FEMA's Hazard Mitigation Grant Program (HMGP) to provide funds to states and local governments to implement long-term hazard mitigation measures after a major disaster declaration.

The proposed DPS 01 Watershed Drainage Upgrades and Green Infrastructure Project Study Area (Study Area) is a two-phased implementation approach to reduce flooding, particularly for the Broadmoor, Central City, Garden District, Lower Garden District, Irish Channel, St. Thomas Development, Touro, East Riverside, and Milan Neighborhoods, and to implement

green infrastructure features in the stormwater drainage system to reduce runoff and create and enhance public landscape and park amenities. Prior to Hurricane Katrina, flood problems experienced in the Study Area were well-documented. In some cases, the drainage infrastructure servicing the Study Area is over 100 years old. It was designed for less development-significantly different infrastructure conditions. The level of development that has occurred in the Study Area has overstressed the storage and conveyance capacity of the existing stormwater infrastructure. The stormwater infrastructure consists of an underground piping network that was originally designed for a 2-year frequency flood event, and degradation of the pipe collection system has further reduced the system's capacity to protect to the 2-year level. Depending on the storm event, both localized street flooding and property damage were recurring neighborhood problems prior to the hurricanes of 2005. Since Hurricanes Katrina and Rita, flooding issues have received even higher scrutiny as neighborhood redevelopment is being encouraged. Small recurring flood problems are now seen in a much different context.

The planned work would include the following:

- Six (6) stormwater parks
- Two (2) stormwater lots
- Eight (8) stormwater drainage (pipe) upgrades associated with stormwater parks
- Eight (8) green intersections with street basins and eight (8) pervious crosswalks
- Pervious pavement along three (3) blocks of Annunciation Street
- Road reconfigurations with bioswales

The proposed project would be accomplished by upgrading the City's stormwater drainage infrastructure with green storage, infiltration, and filtration landscape features along with pipe and street upgrades. Storage would be added throughout the system to create a cascading effect that stores and detains runoff. The proposed project also includes water and sewer improvements that are impacted by the stormwater improvements.

FEMA has considered the following alternatives: 1) the No Action Alternative; 2) Full Build-Out Alternative; 3) Limited Build-Out Alternative (Proposed Action).

FINDINGS

FEMA has made the following determinations from the information contained in the EA:

The proposed project has been evaluated for significant adverse impacts to geology, soils, water resources (surface water, groundwater, and wetlands), floodplains, coastal resources, air quality, biological resources (vegetation, fish and wildlife, federally-listed threatened or endangered species and critical habitats), cultural resources, socioeconomics (including minority and low income populations), safety, noise, and hazardous materials. The results of these evaluations, as well as consultations and input from other federal and state agencies, are presented in the EA. During the construction period, short-term impacts to soils, surface water, transportation, air quality, and noise are anticipated. All short-term impacts require conditions to minimize and mitigate adverse effects to the proposed project site and surrounding areas. No long-term adverse impacts are anticipated from the proposed project.

CONDITIONS

The following conditions must be met as part of the implementation of the project. Failure to comply with these conditions may jeopardize federal funds:

- CNO, as the Sub-recipient, must follow all applicable local, state, and Federal laws, regulations, and requirements and obtain and comply with all required permits and approvals prior to initiating work.
- If human bones or unmarked grave(s) are present within the Study Area, compliance with the Louisiana Unmarked Human Burial Sites Preservations Act (La.R.S. 8:671 et seq.) is required. CNO shall notify the law enforcement agency of the jurisdiction where the remains are located within 24 hours of the discovery. CNO shall also notify FEMA and the Louisiana Division of Archaeology at 225-342-8170 within 72 hours of the discovery.
- If during the course of work, archaeological artifacts (prehistoric or historic) are discovered, CNO shall stop work in the vicinity of the discovery and take all reasonable measures to avoid or minimize harm to the finds. CNO shall inform its HMGP contacts at FEMA, who will in turn contact the FEMA Historical Preservation (FEMA HP) staff. CNO will not proceed with work until FEMA HP completes consultation with the State Historic Preservation Office (SHPO) and others, as appropriate. Archaeological monitoring will be performed by in-house CNO archaeologists or contract support.
- The Louisiana Department of Natural Resources (LDNR) requires that a complete coastal use permit (CUP) application package along with the appropriate application fee, be submitted to their office prior to construction. CNO is responsible for coordinating with and obtaining any required CUP or other authorizations from the LDNR Office of Coastal Management's OCM) Permits and Mitigation Division prior to initiating work. CNO must comply with all conditions of the required permits. All documentation pertaining to these activities and CNO compliance with any conditions should be forwarded to the state and FEMA for inclusion in the permanent project files.
- CNO must comply with all local, state, and Federal requirements related to sediment control, disposal of solid waste, control and containment of spills, and discharge of surface runoff and/or stormwater from the site.
- A Louisiana Pollutant Discharge Elimination System (LPDES) permit is required in accordance with the Clean Water Act (CWA) and the Louisiana Clean Water Code. CNO shall require its contractor to prepare, certify, and implement a construction storm water pollution prevention plan approved by the Louisiana Department of Environmental Quality (LDEQ) to prevent sediment and construction material transport from the project site. All documentation pertaining to these activities and CNO's compliance with any conditions must be forwarded to LA GOHSEP and FEMA for inclusion in the permanent project files.

- Per LDEQ letter dated October 3, 2019 approving the corrective action plan (CAP), with no objection to the plan with the following condition:
 - Only soil with sample results below the Risk Evaluation CAP Screening Standards for non-industrial use may be taken to a Construction and Demolition (C&D) Waste Landfill, for use as cover material.

- Per the United States Army Corps of Engineers (USACE) Letter of No Objection (LONO) to CNO dated March 12, 2020, for permission to improve drainage capabilities by installing storm water parks, pervious pavement, bioswales, and street basins at Central City, Garden District, Irish Channel, St. Thomas, and Lower Garden District Neighborhoods, approximately 30-1500 feet (ft) landward of the left descending Mississippi River Floodwall, vicinity of second order levee station 339+22, at New Orleans, LA. Permission was granted for the CNO's Proposed Action, provided:
 - The work is accomplished in accordance with the above referenced email and accompanying drawings.
 - All excavations and sub-surface work within 300 ft. of the floodwall shall be performed, completed, and backfilled during Mississippi River stages below +11.0 ft. on the Carrollton Gage. No waiver will be granted due to the proximity to the flood protection. Information concerning current river stages may be obtained on the USACE website at www.mvn.usace.army.mil.
 - All excavations and sub-surface work from 300 ft. to 1500 ft. of the floodwall shall be performed, completed, and backfill during Mississippi River stages below +15.0 ft. on the Carrollton Gage.
 - Excavations within 300 ft. shall be backfilled with clay material or native material (not sand). Permeable materials can only be used as bedding material.
 - The applicant must provide written notification to this office of the construction timeline to include the proposed start and end dates. Additionally, the applicant must notify this office prior to commencement and upon completion of the work permitted herein.

- 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, and solvents) 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 or non-hazardous wastes are required to be disposed in accordance with applicable Federal, state, and local regulations.

- Unusable equipment, debris, and material must be disposed of in an approved manner and location. CNO shall handle, manage, and dispose of petroleum products, hazardous materials, and/or toxic waste in accordance with all Federal, state, and local agency requirements. All coordination pertaining to these activities should be documented and copies should be forwarded to the state and FEMA as part of the permanent project files.
- Contractor and/or sub-contractors must properly handle, package, transport, and dispose of hazardous materials and/or waste in accordance with all Federal, state, and local regulations, laws, and ordinances, including all Occupational Safety and Health Administration (OSHA) worker exposure regulations covered within 29 CFR § 1910 and 1926. CNO is responsible for ensuring that renovation or demolition work is coordinated with the LDEQ for abatement activities.
- All waste is to be transported by an entity maintaining a current "waste hauler permit" specifically for the waste being transported, as required by the Louisiana Department of Transportation and Development (LADOTD) and other regulations.
- Best Management Practices (BMPs) should be developed to minimize the disbursement of lead-contaminated soils during construction activities.
- If the improvements require the use of state highway ROW, CNO should contact Ms. Darlene Lamarca in the LADOTD District 02 Office in Bridge City to apply for the appropriate permits. She can be reached by phone at (504) 437-3130 or by mail at P.O. Box 9180, Bridge City, LA 70096-9180. Additional information may be obtained by contacting (225) 242-4502.
- The Southeast Louisiana Flood Protection Authority-East (SLFPA-E), on behalf of the Orleans Levee District, does hereby grant permission to CDM Smith on behalf of CNO Public Works Department ("Permittee") to improve drainage capabilities by installing storm water parks, pervious pavement, bioswales, and street basins at Central City, Garden District, Irish Channel, St. Thomas, and Lower Garden District Neighborhoods, approximately 30-1500 ft. landward of the left descending Mississippi River Floodwall, vicinity of second order levee station 339+22, at New Orleans, LA, in Orleans Parish. ***No waiver will be granted due to the proximity to the flood protection. All excavations and sub-surface work within 300 ft. of the floodwall shall be performed, completed, and backfilled during Mississippi River stages below +11.0 ft. on the Carrollton Gage.***
 - A copy of this Levee Safety Permit, along with a set of approved plans shall be kept on the job site for the duration of the Work and made readily available for any inspector to determine that the Work taking place has been permitted by the SLFPA-E and is being conducted in accordance with approved plans. Failure to do so may result in the revocation of the Levee Safety Permit ("the Permit")

or construction delays. The Levee District has the option to reserve its rights to inspect area prior to construction.

- All work is performed in strict accordance with the provisions set forth in the Coastal Protection and Restoration Authority's (CPRA) LONO #17715, dated May 9, 2019 and the USACE LONO #19-0291, dated March 12, 2020 attached and made a part hereof.
- No work or related activity shall be conducted within the levee district ROW.
- Should changes in the location or section of the existing levee and/or river, or in the generally prevailing conditions in the vicinity, be required in the future in the public interest, the applicant shall make changes in the project concerned or in the arrangement thereof, as may be necessary to satisfactorily meet the situation and shall bear the cost thereof.
- This Permit does NOT obviate the Permittee and Contractor from obtaining permits required from any federal, state, and local authorities, or the USACE, the State Land Office, the LADOTD, and/or the LDNR Coastal Management Division (CMD). Permittee and Contractors are responsible for obtaining all such permits and adhering to their provisions. The SLFPA-E is not responsible for ensuring that the Permittee or its Contractor complies with rules, regulations or laws imposed by other governmental entities/agencies in regard to requirements for permitted activities, and does not enforce permits or regulations required by any of those entities. The Permittee is to provide copies of all city, state and federal permits to the SLFPA-E prior to commencing work.
- The SLFPA-E will not interpret or provide comments on any local laws, zoning or ordinances concerning property rights, operations, or any other activities governed by any Permit that is not a SLFPA-E Permit.
- The permission granted under this Permit is being granted to the Permittee and is not transferable to any other person, company, or agency.
- This Permit does not constitute an approval of the engineering design or any opinion as to the feasibility of the Work.
- The Work shall be constructed in accordance with the submitted details set forth in the Levee Safety Permit Application dated February 18, 2019 by the Permittee, the drawings and specifications accompanying the application, and all other provisions contained herein. This Permit shall automatically expire if construction of the permitted facility has not started within six (6) months of the date of the Permit.

- Any changes to the limits or scope of the proposed Work must be submitted to SLFPA-E for additional review prior to commencement of work covered by the proposed changes.
- Construction activities shall be completed within one (1) year of the Permitting Officer's dated signature of this Levee Safety Permit.
- The Permittee agrees to hold harmless, indemnify, and defend the SLFPA-E and its levee districts, its staff, Commissioners, and agents against any and all damages which arise from the activities of the Permittee, or the Permittee's contractors, tenants and or lessees. Additionally, the Permittee, and all contractors and subcontractors employed to complete the Work must provide a completed SLFPA-E hold harmless agreement (attached with application) signed by a legally authorized representative of each contractor and subcontractor. The hold harmless agreement must be signed, sealed and dated by a Notary Public. An original copy of the signed and authorized hold harmless agreement must be delivered to SLFPA-E at the below address. An original proof of authority to sign the hold harmless agreement (such as a copy of a corporate resolution) must also be provided. Contractors and subcontractors that do not comply with this requirement shall not be allowed access to the levee right-of-way.
- In addition to any other provisions provided herein, Permittee specifically assumes any and all responsibility for property damage to the SLFPA-E or any of its levee districts' property, and to personal injury to the any of its officers, agents, servants or employees caused by, resulting from, arising out of or connected with the use of the Premises and/or any buildings and improvements thereon or caused by the activities of Permittee and/or its invitees and/or licensees on the subject property.
- All contractors and subcontractors employed to complete work in the Right of Way shall provide certificates of insurance as proof of compliance with the SLFPA-E Levee Safety Permit Insurance Requirements, attached and made a part hereof. Contractors that do not comply with this requirement shall not be allowed access to the levee right-of-way. The following shall be named as certificate holders and the additional insured on general liability, automobile liability, aviation liability and marine insurance: Southeast Louisiana Flood Protection Authority – East, 6920 Franklin Avenue, New Orleans, LA 70122. Failure to provide the appropriate certificates of insurance may result in a revocation of the Permit and/or construction delays.
- The SLFPA-E permit office shall be given notice in writing at least 3 days (excluding weekends and holidays) prior to commencement of any work, and at the end of activities so that appropriate inspections can be made. The Permittee, contractor, or an authorized representative may send notification via

email. However, the entity providing notification is responsible for verifying receipt of notification.

- The Permittee shall provide the SLFPA-E with photographs of the completed work, which must show the relationship of the work and its relative location to the flood control structure making this Permit necessary.
- The proposed Work shall not restrict the Levee District's maintenance operations, or any potential flood fighting activities along the levee, nor shall it obstruct or impede drainage, or create areas of standing water on the levee, along the levee toe, or in the levee batture.
- No equipment, vehicles or materials of any kind may be parked or stored on the levee or its slopes without prior approval from the Levee District.
- An "after-the-fact" Permit request will be reviewed as though no work had been initiated and any work found not to be acceptable for permitting shall be removed at the Permittee's expense. The Permittee is responsible for maintaining the existing level of flood protection at all times and shall employ and maintain at the project site suitable erosion protection measures to the satisfaction of the Levee District.
- The contractor shall preserve and protect all levee monuments and shall install a sleeve and cap at each monument locations to allow access to the monument through the asphalt pavement.
- Any structural facilities constructed at the flood side of the levee and/or floodwall will be anchored sufficiently to resist flotation, collapse, or lateral movement in the event of flooding or inundation. Alternatively, in lieu of the above-referenced anchorage of installations and facilities they must be capable of immediate removal from the floodway upon request of the USACE or the SLFPA-E.
- All materials associated with the proposed Work must be removed from the area upon completion of the project and the area must be returned to its original state of existence or better.
- Any damage done to the levee, floodwall or other flood control structure, revetment, or surrounding project area, resulting from the proposed Work shall be repaired or replaced by Permittee at the Permittee's expense and to the satisfaction of the Levee District.
- The Permittee shall provide a set of As-Built Plans to the SLFPA-E upon completion of the Work.

- If for any reason the Permittee ceases to maintain operations, the APPLICANT/OWNER must obtain a modification of this Permit, which may require that any or all structures and materials in the area of operation be removed at the Permittee's expense.
- The SLFPA-E may revoke this Levee Safety Permit if it determines that the provisions contained in this permit are not being met, or if the permitted activity damages the levee system infrastructure.
- It is further hereby expressly agreed that the obligations of the Permittee under this Permit shall survive the expiration and/or termination of this Permit.
- FOR CAMPS - Permittee understands that the SLFPA-E, the USACE and/or their contractors may need access to the area to perform maintenance. Permittee also understands that because of the maintenance it may not have direct access to the site and may have to temporarily use an alternative route to access its property.

CONCLUSION

The results of these evaluations, as well as consultations and input from other federal and state agencies, are presented in the EA and appendices. Based on the information analyzed, FEMA has determined that the implementation of the proposed action would not result in significant adverse impacts to the quality of the natural and human environment. In addition, the proposed project does not appear to have the potential for significant cumulative effects when combined with past, present, and reasonably foreseeable future actions. As a result of this FONSI, an Environmental Impact Statement will not be prepared (per 44 C.F.R. § 10.9) and the proposed project as described in the EA may proceed.

APPROVAL

Dorothy Cook
FEMA Region VI
Supervisory Environmental Protection Specialist

Date