

APPENDIX 2

Coordination Letters



REPLY TO
ATTENTION OF

Regional Planning and
Environment Division South
New Orleans Environmental Branch

DEPARTMENT OF THE ARMY
HURRICANE PROTECTION OFFICE, CORPS OF ENGINEERS
P. O. BOX 80267
NEW ORLEANS, LOUISIANA 70180-0267

October 11, 2013



Jeff Weller
Field Supervisor
U.S. Fish and Wildlife Service
646 Cajundome Blvd - Suite 400
Lafayette, LA 70506

This project has been reviewed for effects to Federal trust resources
under the jurisdiction and currently protected by the Endangered
Species Act of 1973 (Act). This project, as proposed,
 will have no effect on these resources.
 It may have an adverse effect from resources.
The finding falls into category (a) under Section 7(a)(2) of the Act.

Debra A. Fuller Oct 18, 2013
Date

Dear Mr. Weller:

The U.S. Army Corps of Engineers, New Orleans District (CEMVN) is preparing an Environmental Assessment (EA) #526 entitled "526 St. Bernard Parish Pump Station #2 and #3 Seepage Repairs, St. Bernard Parish, Louisiana" to evaluate potential impacts associated with repair of a seepage issue at both pump stations. The proposed action described in this EA #526 pertains to replacing existing discharge pipes and I-walls with T-walls on the non-Federal St. Bernard back levee. The proposed repairs are necessary for the St. Bernard stormwater drainage system to function properly. This EA #526 is being prepared in accordance with the National Environmental Policy Act (NEPA) of 1969 and the Council of Environmental Quality's (CEQ) regulations (40 Code of Federal Regulations [CFR] 1500-1508), as reflected in the USACE Engineering Regulation (ER) 200-2-2.

A CEMVN biologist has determined that no significant impacts to Threatened and Endangered (T&E) species or their critical habitat would occur as a result of this proposed work. CEMVN Environmental staff will continue to coordinate with the U.S. Fish and Wildlife Service (USFWS) and would like to request that USFWS review the enclosed proposed impacts description and provide concurrence with our determination of "not likely to adversely effect" the West Indian manatee. A detailed description of the proposed repairs for the Pump Stations #2 and #3 project and the T&E assessment is enclosed. If you have any questions or require additional information, please do not hesitate to contact Ms Laura Lee Wilkinson at 504-862-1212 or by email to Laura.L.Wilkinson@usace.army.mil.

Sincerely,

for Sandra Stiles
Joan M. Exnicios
Chief, New Orleans Environmental Branch

-1-



REPLY TO
ATTENTION OF

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

October 11, 2013

Regional Planning and
Environment Division South
New Orleans Environmental Branch

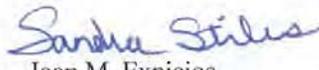
Jeff Weller
Field Supervisor
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646 Cajundome Blvd - Suite 400
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Sincerely,


for
Joan M. Exnicios
Chief, New Orleans Environmental Branch

-1-

A2-3

ST. BERNARD PUMP STATIONS 2 & 3 SEEPAGE REPAIRS

DESCRIPTION OF THE ACTION

The St. Bernard pump stations Guichard (#2) and Bayou Villere (#3) were previously replaced as a result of repairs following Hurricane Katrina (EA #433 and Coastal Zone Consistency 20060155).

Figure 1. Location Map.

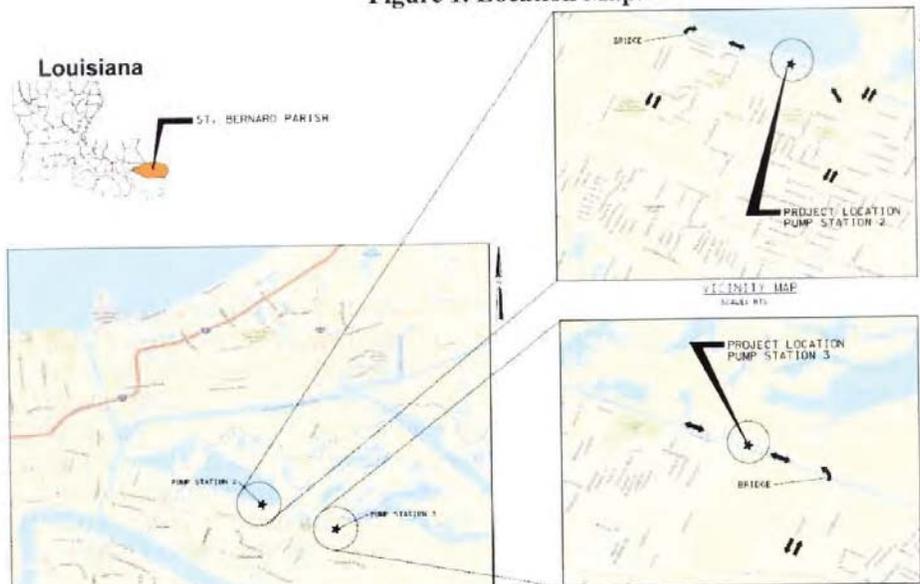
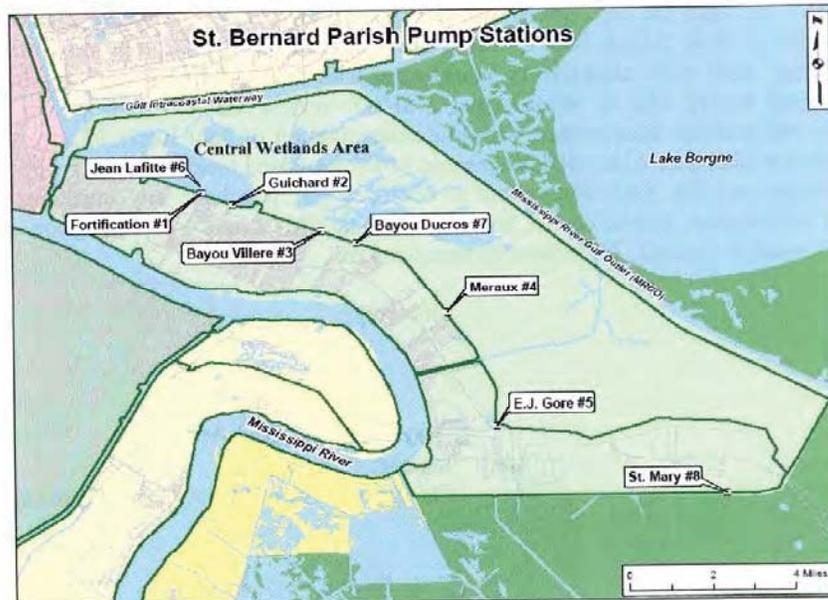


Figure 2. St. Bernard Parish Pump Stations, the pump stations discharge into the CWA.



The proposed construction would consist of installation of a concrete T-wall to replace existing I-walls, replacement of discharge pipes on the flood side of the levee, and the tie-in of access roadways along the local levee reach within the construction limits (figure 3, 4 and 5).

The T-wall system would be constructed to eliminate a seepage problem, provide fronting protection, and stabilize the earthen section at the pump stations. The surrounding levee reaches adjacent to the scope features would not be impacted aside from use as access with the exception of structural T-wall and access road tie-in areas. All elevations herein are based on NAVD 88 (2004.65).

The new constructed top of T-wall shall be approximately El. 10.0 feet (ft). The length would be approximately 490 ft for PS #2 and 390 ft for PS#3. It shall be located roughly in line with the existing levee alignment and consist of a sheet-pile cutoff wall below the base foundation, steel H-pilings (54,000 ft) for support and approximately 3,000 cubic yards (cy) of concrete would be used to form the T-wall structure. The proposed T-wall fronting protection would tie into the existing local levee system. Approximately 300 tons of riprap would be placed adjacent to the T-wall to provide stabilization on the flood side.

The proposed work includes replacing four discharge pipes (330 ft length) at PS #2 and three pipes (260 ft length) at PS #3. A temporary retaining structure (TRS) would be built to allow workers to access the pipes and perform the work for approximately 12 months. The TRS, also referred to as a cofferdam, would involve installing approximately 9,600 ft of steel sheet-pile surrounding the construction area (figures 3, 4, 5). The TRS at PS #2 would be 78 ft by 70 ft and the TRS at PS #3 would be 85 ft by 53 ft in size. A work buoy (small boat approximately 10 ft wide by 15 ft long) would allow access to the area and a vibratory hammer would be used to install the sheet pile. Once the TRS is in place, the discharge basin water would be pumped via a temporary pump to the CWA. After the new discharge pipes are installed, the TRS would be removed, and the levee/T-wall interface would be re-vegetated with grass.

Road work includes re-grading the existing pump station access roads following construction and replacing bridges located over the discharge pipes with pre-fabricated waskey bridges (15 ft width x 60 ft length). Existing trench drains on bridges would be removed and the bridge would be designed to allow subsurface drainage. Entrance to the road is restricted and not accessible to the public.

Off site borrow material will not be needed. Approximately 900 cy of sediment material would be excavated during construction and re-used onsite as part of levee toe and re-grading access road. Any excess excavation material and construction debris shall become the property of the contractor and legally disposed of off-site at a landfill permitted to accept the waste and construction debris material.

A temporary office/storage area would be established within the existing levee right-of-way adjacent to either PS #2 or PS #3. The contractor would be required to return the area to its existing conditions when construction is complete.

Transportation routes include Jean Lafitte Parkway and Paris Road for PS #2 and Bartolo Street for PS #3. Equipment to be used includes a bulldozer, concrete trucks, concrete pump trucks, backhoe, crane, pile driver, sheepsfoot roller, and flat roller. The contractor would take reasonable measures to avoid unnecessary noise appropriate for the ambient sound levels in the area during working hours (7 am to 7 pm). All construction machinery and vehicles shall be equipped with practical sound muffling devices, and operated in a manner to cause the least noise, consistent with efficient performance of the work. The contractor shall comply with local noise ordinance.

The contractor would take reasonable measures to prevent unnecessary dust. Surfaces subject to creating dust would be kept moist with water. Dusty material piles on site or in transit shall be covered to prevent blowing. Silt fencing /erosion control would be installed and maintained throughout project area consistent with the Storm Water Pollution Prevention Plan.

It is estimated that the total duration of project construction activities would be approximately 12 months. Both PS projects would be constructed concurrently. The total area encompassed within the proposed project limits of construction would be approximately 1.72 acres at PS #2 and 1.61 acres at PS #3. This acreage includes approximately 0.03 acres at PS #2 and 0.02 acres of wetland edge vegetation comprised of mixed grasses (*Cyperus* sp. and *Carex* sp.) and shrubs (*Myrica* sp.) that would be temporarily impacted (photographs 1 and 2). Both pump stations had floating invasive duck weed (*Lemna* sp.) present, PS #3 was 90% covered.

Photograph 1. St. Bernard Parish Pump Station #2 flood side wetland edge vegetation.



Photograph 2. St. Bernard Parish Pump Station #3 flood side wetland edge vegetation and existing sheetpile cofferdam. Invasive duckweed covers almost the entire discharge basin.



Figure 3. PS #2 Guichard proposed seepage repairs include the replacement of discharge pipes, the floodwall T-wall, and re-grading the gravel access road. The temporary cofferdam would be removed when construction is complete.

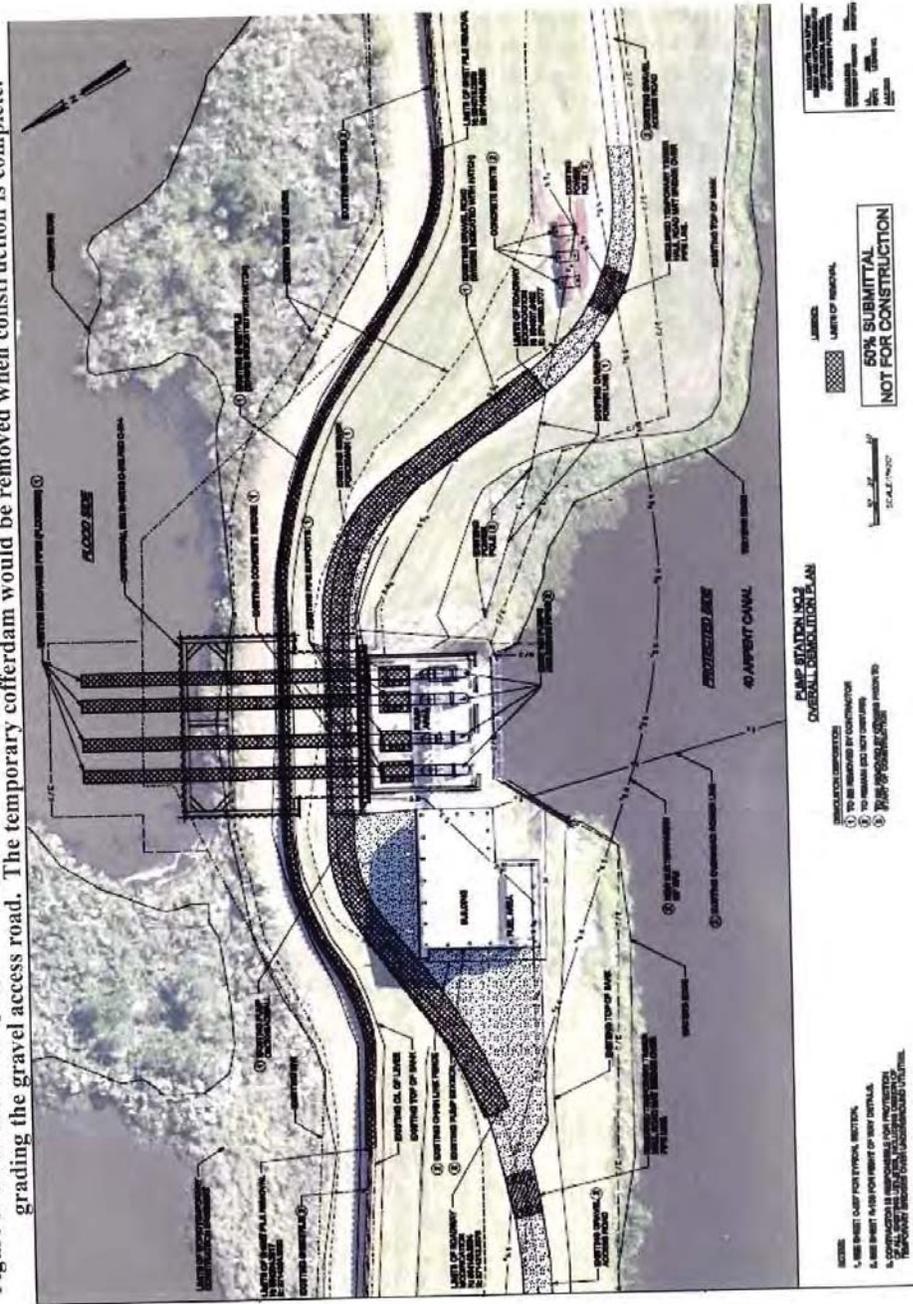
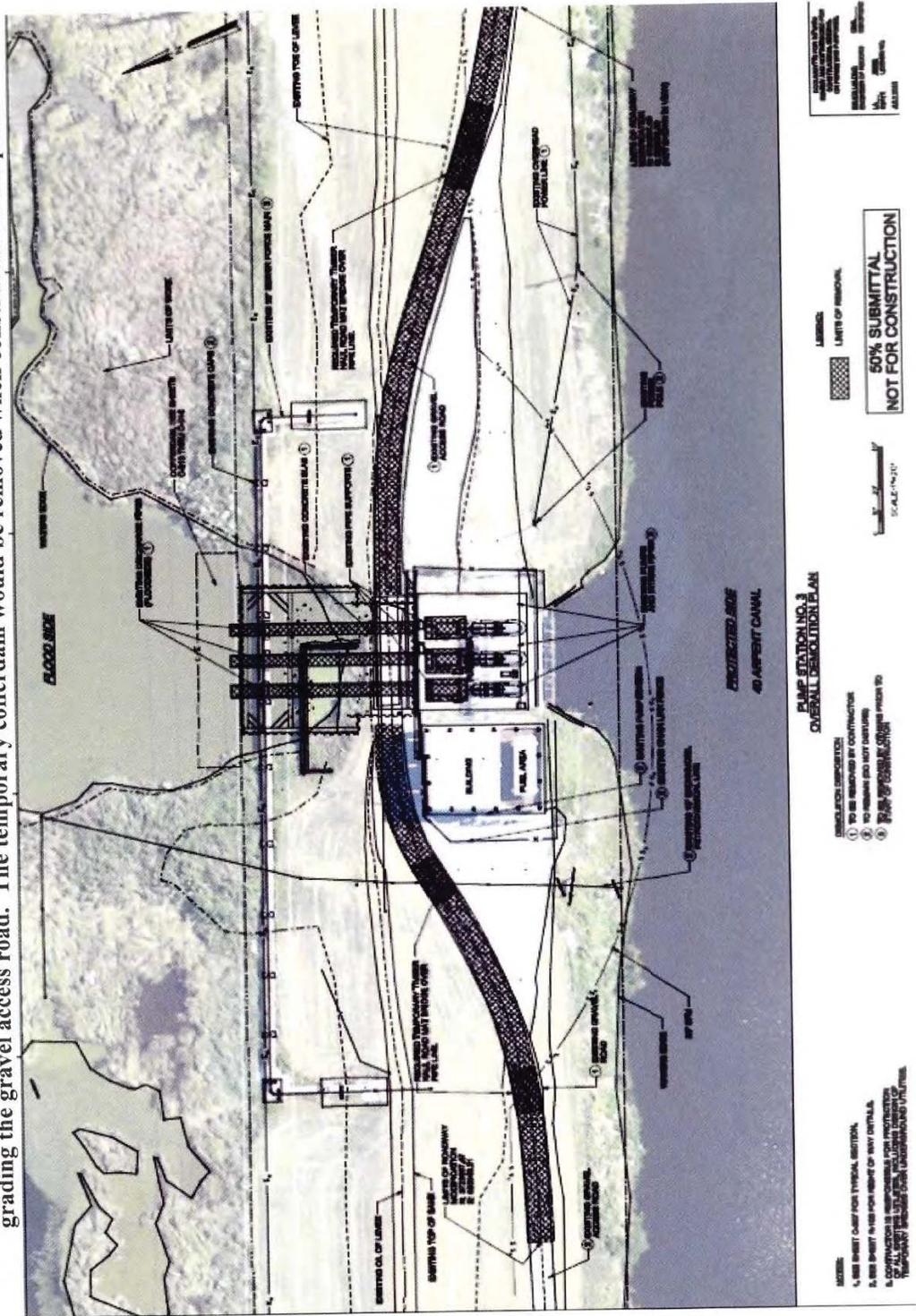


Figure 5. PS #3 Bayou Villere proposed seepage repairs include the replacement of discharge pipes, floodwall T-wall, and re-grading the gravel access road. The temporary cofferdam would be removed when construction is complete.



The EA #526 Threatened and Endangered Species write-up would be as follows:

3.1.5 THREATENED AND ENDANGERED SPECIES

Existing Conditions

The only threatened and endangered (T&E) species potentially found in the project area would be the West Indian Manatee (*Trichechus manatus*). West Indian manatees are large, gray aquatic mammals also known as sea cows. The average adult manatee is about 9.8 feet long and weighs between 800-1,200 pounds. Manatees can be found in shallow, slow-moving rivers, estuaries, salt-water bays, canals, and coastal areas. Manatees are completely herbivorous and feed on SAV, emergent and floating aquatic plants and can consume 10-15 percent of their body weight daily. West Indian manatees have no natural enemies, and it is believed that they can live 60 years or more. Manatees concentrate in Florida in the winter, but can be found in the summer months as far west as Texas and as far north as Virginia. West Indian manatees occasionally enter Lakes Pontchartrain and Lake Borgne and associated coastal waters and streams during the summer months (June through September). Manatees have been reported in the Amite, Blind, Tchefuncte, and Tickfaw Rivers and in canals within the adjacent coastal marshes of Louisiana. Collisions with powerboats or outboard propellers pose a significant threat to manatees. Watercraft collisions account for approximately 25 percent of all manatee deaths. Boats traveling faster than 15 mph are capable of injuring or killing a manatee. Manatees can also be injured or entangled in locks, flood control structures, and fishing nets.

There have been no sightings of manatees in the immediate vicinity of the PS discharge basins, however, most recently two manatees were sighted crossing through the Borgne Barrier sector gate on the Gulf Intracoastal Waterway on August 20, 2012. Therefore, it is possible they could enter the CWA and forage for food in the surrounding bayous and waterways. CEMVN initiated coordination of the proposed action for the seepage repair in a letter dated October 11, 2013 and requested USFWS concurrence with our determination of "not likely to adversely affect". The USFWS reviewed the proposed action to see if it would affect any threatened and endangered (T&E) species under its jurisdiction, or their critical habitat. The USFWS concurred with the CEMVN in a fax letter dated October XX, 2013 that the proposed action would not have adverse impacts on T&E species under its jurisdiction (appendix X).

4.5 THREATENED AND ENDANGERED SPECIES

Future Conditions with No Action

Under the no action alternative, alternative there would be no direct or indirect impacts hence, no adverse effects to T&E species or critical habitat would occur. There would be no construction to repair the PS #2 Guichard and PS #3 Bayou Villere seepage issue and they would continue to not operate to discharge stormwater. Regular pumping of storm water from all other pump stations for the developed areas of St. Bernard Parish into the surrounding water bodies of the CWA in response to rainfall events would continue.

Future Conditions with the Proposed Action

The construction of the proposed action would not be likely to adversely affect federally or state listed threatened and endangered species or marine mammals. The USFWS responded to the endangered species coordination in a letter/facsimile dated October XX, 2013 that the proposed action for seepage repair is not likely to adversely affect the West Indian manatee. Standard manatee protection measures would be followed in order to minimize the potential for construction activities to impact the manatee. These procedures have been recommended by the USFWS for use in situations where in-water construction activities potentially could occur where manatees may be present. These procedures include the following:

All contract personnel associated with the project would be informed of the potential presence of manatees and the need to avoid collisions with manatees. All construction personnel would be responsible for observing water-related activities for the presence of manatees. Temporary signs would be posted prior to and during all construction or dredging activities to remind personnel to be observant for manatees during active construction/dredging operations or within vessel movement zones (i.e., the work area), and at least one sign would be placed where it is visible to the vessel operator. Siltation barriers, if used, would be made of material in which manatees could not become entangled and would be properly secured and monitored. If a manatee is sighted within 100 yards of the active work zone, special operating conditions would be implemented, including: moving equipment would not operate within 50 ft of a manatee; all vessels would operate at no wake/idle speeds within 100 yards of the work area; and siltation barriers, if used, would be re-secured and monitored. Once the manatee has left the 100-yard buffer zone around the work area of its own accord, special operating conditions would no longer be necessary, but careful observations would be resumed. Any manatee sighting would be immediately reported to the U.S. Fish and Wildlife Service (337/291-3100) and the LaDWF, LaNHP (225/765-2821). These procedures have been recommended by the USFWS (2009) and adopted by the USACE (2005) for use in situations where in-water construction activities potentially could occur when manatees may be present.

Assuming the above procedures for preventing disturbance or injury to manatees are employed, the potential for direct impacts during the period of construction of the proposed action at PS #2 and PS #3 would be minimal and unlikely to adversely affect this species.

A no effect determination for the Gulf sturgeon and Kemp's ridley, green, and loggerhead sea turtles has been made for the proposed seepage repair. Factors evaluated for this determination include the following: the area impacted by this project is not designated critical habitat; the water bottom where the discharge pipes would be replaced consists of mud, rock, and riprap, so it doesn't contain an abundance of prey items (sturgeon prefer sandy bottom substrate, not rock and concrete); no dredging would occur as part of this project, and work would be within a 0.1 acre cofferdam in the dry, and BMPs and a SWPPP would be implemented to minimize impacts to water quality in the project area; and the seepage repair is replacing existing discharge pipes of a pump station so the site has already been impacted. Sturgeon and sea turtles could potentially be present in the area, but likely would avoid the area during construction due to noise, lack of prey items, and work occurs within discharge basin of a pump station. All other construction for the T-wall and road improvements would involve construction on land and not impact threatened

or endangered species or critical habitat. Construction activities may have a temporary impact on foraging habitat adjacent to the project area. Increases in noise, traffic, and lighting levels would also temporarily affect the manatee foraging habitat, however no submerged aquatic vegetation is present in the project area.

Potential indirect impacts on federally or state listed threatened and endangered species from the proposed action could mainly consist of temporary effects from siltation and suspended sediment in adjacent water bodies of the CWA and increased noise levels from construction activities. Effects from construction activities associated with the proposed action would be minimized by BMPs to control sediment transport, adherence to regulations governing stormwater runoff at construction sites, and the temporary nature of noise impacts. Given that the proposed action repairs existing pump stations that operate for rain and storm events, indirect impacts on endangered or threatened species from the proposed action would be minimal. Thus, indirect impacts on federally or state listed threatened and endangered species from the proposed action would be unlikely to have any additional permanent adverse effects on these species.

Potential cumulative impacts on federally or state listed T&E within the project area from the proposed action would involve the combined effects from the HSDRRS specifically the Chalmette Loop levee/T-wall, CWPPRA projects, wetland restoration and shoreline protection; the Violet freshwater diversion project; MRGO deep-draft deauthorization; and local community wetland restoration projects would reduce potential adverse cumulative impacts by positively affecting suitable habitat within and around CWA. Manatees are mobile and would avoid project areas during the construction period. The impacted 0.2 acres of aquatic and 0.05 acres of fringe fresh/intermediate marsh would be negligible. Neither manatees, Kemp's ridley, Loggerhead, or green sea turtles, nor Gulf sturgeon would be anticipated to utilize the land areas within the project ROW or the rock riprap portion of the pump station discharge basins. Extensive more suitable aquatic and benthic habitat exists elsewhere in the Pontchartrain basin where the manatee, Kemp's ridley, Loggerhead and green sea turtles, and Gulf sturgeon could forage or swim. Thus, cumulative impacts on federally or state listed threatened and endangered species from the proposed action would be unlikely to have permanent adverse effects on T&E species.

BOBBY JINDAL
GOVERNOR



STEPHEN CHUSTZ
SECRETARY

State of Louisiana
DEPARTMENT OF NATURAL RESOURCES
OFFICE OF COASTAL MANAGEMENT

October 31, 2013

Laura Lee Wilkinson
U.S. Army Corps of Engineers - New Orleans District
P.O. Box 60267
New Orleans, LA 70160-0267

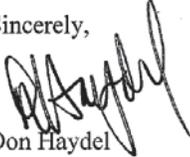
RE: **C20060155 mod 01**, Coastal Zone Consistency
New Orleans District, Corps of Engineers
Direct Federal Action
Replace discharge pipes, and replace I-wall with T-wall, at St. Bernard Pumping Stations
#2 and #3, **St. Bernard Parish, Louisiana**

Dear Ms. Wilkinson:

The above referenced project modification has been reviewed for consistency with the Louisiana Coastal Resources Program in accordance with Section 307 (c) of the Coastal Zone Management Act of 1972, as amended. The project, as proposed in this application, is consistent with the LCRP.

If you have any questions concerning this determination please contact Jeff Harris of the Consistency Section at (225) 342-7949 or 1-800-267-4019.

Sincerely,


Don Haydel
Acting Administrator
Interagency Affairs/Field Services Division

DH/jdh

cc: Dave Butler, LDWF
Frank Cole, OCM

Post Office Box 44487 • Baton Rouge, Louisiana 70804-4487
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PEGGY M. HATCH
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

NOV 06 2013

U.S. Army Corps of Engineers - New Orleans District
P.O. Box 60267
New Orleans, LA 70160-0267

Attention: Laura Lee Wilkinson

RE: Water Quality Certification (WQC 131016-01/AI 101235/CER 20130010)
St. Bernard Parish Pump Station #2 and #3 Seepage Repairs
St. Bernard Parish

Dear Ms. Wilkinson:

The Louisiana Department of Environmental Quality (the Department) has reviewed your application to place fill material for repairs to the St. Bernard stormwater drainage system, along the back protection levee in Chalmette, Louisiana.

Based on the information provided in the application, the Department made a determination that the requirements for a Water Quality Certification have been met and concludes that the placement of the fill material will not violate water quality standards of Louisiana as provided for in LAC 33:IX.Chapter 11. Therefore, the Department hereby issues a Water Quality Certification to U.S. Army Corps of Engineers - New Orleans District.

If you have any questions, please call Blake Perkins at 225-219-3540.

Sincerely,

A handwritten signature in blue ink, appearing to read "Scott Guilliams".

Scott Guilliams
Administrator
Water Permits Division

SG/bmp

c: Corps of Engineers- New Orleans District