UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

January 15, 2013

Walter Krygowski
Chief Operating Officer
Louis Armstrong New Orleans
International Airport
P.O. Box 20007
New Orleans, LA 70141

Subject: Louis Armstrong New Orleans Airport – Environmental Assessment

The Environmental Protection Agency (EPA) Region 6 is responding to your letter dated December 20, 2012 seeking input for the development of an Environmental Assessment (EA) for the Louis Armstrong New Orleans International Airport. The EA will analyze the effects from long-term development activities on the airport. In accordance with the National Environmental Policy Act, and under Section 309 of the Clean Air Act, our agency is providing the following comments to assist you with the preparation of the EA.

Air Quality

Due to the type of project and its long-term utility, we recommend the draft EA consider the effects of greenhouse gas (GHG) emissions. By statutes, Executive Orders, and agency policies, the Federal government is committed to the goals of energy conservation, reducing energy use, and eliminating or reducing GHG emissions. For guidance, please see the Council on Environmental Quality's "Draft NEPA Guidance on Consideration of the Effects of Climate Change and Greenhouse Gas Emissions" dated February 18, 2010 and "Federal Greenhouse Gas Accounting and Reporting Guidance" dated October 6, 2010. If the analysis shows substantial GHG emissions, we recommend including mitigation measures.

Due to its location within the Jefferson Parish 1-hour ozone maintenance area, an air quality analysis should be completed for effects on the National Ambient Air Quality Standards. When analyzing criteria air pollutants, we recommend utilizing the highest-case future passenger enplanements projections when considering the potential increase in activity for the facility over the planning period.

Water

The project area contains waters of the U.S. that are included on the state's Clean Water Act §303(d) list. When characterizing impacts to these waters, make certain to include the impairment status of the waterway and describe how the project will not contribute to its impairment.

Environmental Justice

Due to the project location, we recommend the draft EA include a detailed characterization of the demographics within 0.5 mile of the airport. Data should be provided from the most recent U.S. Census data for Census Tracts and Block Groups, focusing on minority and low-income populations. If this data demonstrates that there is a large minority or low-income population near the airport that may be affected by the project, then an analysis of impacts to those populations should be included. Impacts to off-airport residential populations could include an increase in aviation noise, construction dust and noise, street closures, etc.

Cumulative Impacts

We recommend the draft EA include an in-depth and thorough analysis of cumulative impacts. 40 CFR §1508.7 states "Cumulative impact is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time." EPA suggests you refer to the Council on Environmental Quality's "Considering Cumulative Effects Under the National Environmental Policy Act" and EPA's "Consideration Of Cumulative Impacts in EPA Review of NEPA Documents" for assistance with identifying appropriate temporal and spatial boundaries and identifying appropriate past, present, and reasonably foreseeable future projects to include in the analysis.

We appreciate the opportunity to review this scoping request and are available to discuss our comments. Please send a copy of the completed draft EA to 1445 Ross Avenue, Suite 1200 to my attention. Thank you for your coordination and don't hesitate to contact John MacFarlane, of my staff, at 214-665-7491 or macfarlane.john@epa.gov should you have any questions or concerns regarding this letter.

Sincerely,

Rhonda Smith
Chief, Office of Planning and
Coordination