



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 6

1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

October 26, 2012

Ed Elam
Burk-Kleinpeter, Inc.
4176 Canal Street
New Orleans, LA 70119

SUBJECT: Replacement of Belle Chasse Tunnel and Bridge, Jefferson and Plaquemines Parish, Louisiana

Dear Mr. Elam,

The Environmental Protection Agency (EPA) Region 6 has received the correspondence dated September 10, 2012 requesting comments. Our comments are provided in accordance with the National Environmental Policy Act and Section 309 of the Clean Air Act.

We have identified the following areas of concern that should be addressed in the Draft Environmental Assessment (DEA):

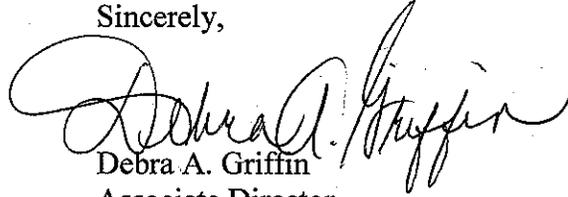
- Wetlands may be within and near the study area, coordination with the U.S. Army Corps of Engineers may be required;
- Hazardous materials may be encountered during construction, a Phase 1 Environmental Site Assessment should be completed to evaluate the potential for contamination to be present on or adjacent to the project area;
- Study area is within the 100 year floodplain, coordination with the local floodplain administrator is required;
- Paul J. Solis Elementary School is within 100 feet of the study area, sensitive noise receivers and sensitive air receptors should be quantified and evaluated for impacts;
- Study area is within the Jefferson Parish 1-hour ozone maintenance area;
- Study area contains 42.4 percent minority populations, provide detailed demographic and economic data and an evaluation of project impacts to Environmental Justice populations, and;
- Cumulative Impact Analysis - 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 strongly suggests you refer to the Council on Environmental Quality's "Considering Cumulative Effects Under the National Environmental Policy Act"¹ and EPA's "Consideration Of Cumulative Impacts in EPA Review of NEPA Documents"² for assistance with identifying appropriate temporal and spatial boundaries and identifying appropriate past, present, and reasonably foreseeable future projects to include in the analysis.

¹ <http://ceq.hss.doe.gov/nepa/ccenepa/ccenepa.htm>

² <http://www.epa.gov/compliance/resources/policies/nepa/cumulative.pdf>

We appreciate the opportunity to review this request. Please send a copy of the completed DEA to 1445 Ross Avenue, Suite 1200, Dallas, TX 75202 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,



Debra A. Griffin
Associate Director
Compliance Assurance and
Enforcement Division

cc: Jeffrey Roesel
Regional Planning Commission

Noel Ardoin
Louisiana Department of
Transportation and Development