



Preserving America's Heritage

December 17, 2018

Mr. Jerame Cramer  
Environmental Liaison Officer  
Federal Emergency Management Agency  
Louisiana Integration and Recovery Office  
Environment and Historic Preservation  
1500 Main Street  
Baton Rouge, LA 70802

Ref: *Proposed Joint Infrastructure Recovery Request Project*  
*City of New Orleans, Orleans Parish, Louisiana*  
*ACHPConnect Log Number:013359*

Dear Mr. Cramer:

On December 14, 2018, the Advisory Council on Historic Preservation (ACHP) received a notice of adverse effect from the Federal Emergency Management Agency (FEMA) for the referenced undertaking along with a request to use the abbreviated consultation process contained in Stipulation II.C.6.a. of the amended 2016 *Programmatic Agreement Among the Federal Emergency Management Agency, the Louisiana State Historic Preservation Officer, the Governor's Office of Homeland Security and Emergency Preparedness, and Participating Tribes (PA)*.

The abbreviated consultation process (ACP) outlined in Stipulation II.C.6.a allows for the use of standard mitigation treatments. FEMA proposes to use Treatment Measures I (Recordation for Standing Structures), III (Public Interpretation), IV (Historical Context Statements), VI (Historic Property Inventory), and IX (Archaeological Research Design and Data Recovery Plans). The Louisiana State Historic Preservation Officer, as well as several other consulting parties, have concurred with FEMA's use of the ACP. The ACHP also supports FEMA's proposed resolution of adverse effects.

We appreciate the opportunity to participate in consultation for this undertaking. If we may be of any further assistance as the undertaking is implemented, please contact Mr. Anthony Guy Lopez at (202) 517-0220 or via email at [alopez@achp.gov](mailto:alopez@achp.gov).

Sincerely,

Jaime Loichinger  
Acting Assistant Director  
Office of Federal Agency Programs  
Federal Permitting, Licensing and Assistance Section



BILLY NUNGESSER  
LIEUTENANT GOVERNOR

**State of Louisiana**  
OFFICE OF THE LIEUTENANT GOVERNOR  
DEPARTMENT OF CULTURE, RECREATION & TOURISM  
OFFICE OF CULTURAL DEVELOPMENT

RICHARD H. HARTLEY  
DEPUTY SECRETARY

KRISTIN P. SANDERS  
ASSISTANT SECRETARY

November 27, 2018

Jerame Cramer  
Environmental Liaison Officer  
Federal Emergency Management Agency  
1500 Main St.  
Baton Rouge, LA 70802

**RE: Section 106 Review Consultation, Hurricane Katrina, FEMA-1603-DR-LA**  
**Applicant:** City of New Orleans (CNO) and Sewerage and Water Board  
**Undertaking:** Joint Infrastructure Recovery Request (JIRR), New Orleans, Orleans Parish, Louisiana (PW 21031 and 21032)  
**Determination: Adverse Effect to Historic Properties**

Dear Mr. Cramer:

Thank you for your letter received November 6, 2018 regarding the above referenced undertaking. We understand the Federal Emergency Management Agency (FEMA) proposes, under the Robert T. Stafford Disaster Relief and Emergency Assistance Act, P.L. 93-288, as amended, in response to a major Disaster Declaration designated as FEMA-1603-DR-LA, and dated August 29, 2005, as amended, to fund through its Public Assistance Program the Joint Infrastructure Recovery Request (JIRR) New Orleans, Orleans Parish, Louisiana (PW 21031 and 21032)

As mentioned in the background section of the letter, FEMA and SHPO have already reviewed a number of JIRR projects using the Programmatic Allowances in the 2016 Statewide PA, and SHPO has concurred with No Adverse Effect Findings, with conditions, on these projects. None of them included full reconstructions.

This consultation is for the overall JIRR undertaking, which includes everything from incidental repairs to full road reconstruction. We concur with the APE as described in the letter, which includes approximately 9,061 blocks in New Orleans, located within 26 historic districts, and includes 705 recorded archaeological sites.

Based on the description of the undertaking, SHPO concurs with FEMA's assessment there may be an Adverse Effect to Historic Properties. We also concur with the decision to address the adverse effects using the Abbreviated Consultation Process.

SHPO agrees with the following minimization measures as fully outlined in the November 6<sup>th</sup> letter and summarized below:

**Archaeology:**

- CNO will hire an archaeologist to serve as a liaison to FEMA and SHPO. The archaeologist will be responsible for monitoring work where there is an identified potential for burials, human remains, burial furniture or artifacts, or pre-contact, contact and colonial era archaeological sites.

**Built Environment:**

- CNO/SWBNO will avoid or minimize effects to character defining features of streetscapes within National Register Historic and National Historic Landmark Districts by adhering to the conditions listed in Appendix 2 where technically feasible.
- CNO will hire a historic preservation Specialist to serve as a liaison to FEMA and SHPO.

SHPO also concurs with the implementation of the following treatment measures to mitigate the adverse effects of the Undertaking, as fully outlined in the November 6<sup>th</sup> letter and summarized below:

**Archaeology:**

- CNO/SWBNO will be responsible for the development of a cultural resource context statement and may develop other interpretive materials.
- CNO/SWBNO will ensure the development of a public outreach program for archaeology based on the cultural resource context statement.

**Built Environment:**

- CNO/SWBNO will be responsible for conducting research and a field sampling survey of character defining streetscape features in each affected NRHP listed or eligible district.
- CNO/SWBNO will be responsible for drafting a historic context statement focusing on the history of the streetscape throughout all affected NRHP listed or eligible districts.

Should you have any questions concerning our comments, do not hesitate to contact Andrea McCarthy at (225) 342-8164, amccarthy@crt.la.gov.

Sincerely,



Kristin P. Sanders  
State Historic Preservation Officer

**From:** [Martinez, Amber](#)  
**To:** [Wyma, Cornelia \(CTR\)](#); [Cramer, Jerame](#)  
**Subject:** FW: FEMA 106: Adverse Effect for CNO/SWBNO JIRR (PW#s 21031 and 21032)  
**Date:** Thursday, December 6, 2018 4:31:52 PM

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[Amber Martinez](#)  
FEMA Environmental Historic Preservation  
504-256-3801

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**From:** Turner Hunt [mailto:thunt@mcn-nsn.gov]  
**Sent:** Thursday, December 6, 2018 4:30 PM  
**To:** Martinez, Amber <Amber.Martinez2@fema.dhs.gov>  
**Subject:** FEMA 106: Adverse Effect for CNO/SWBNO JIRR (PW#s 21031 and 21032)

Ms. Martinez,

Hello, we have been backed up at the office this month and I wanted to check and see if the comment period for this project is complete. According to FEMA I had 15 days to respond and we are currently at the thirty day mark. I am also having trouble tracking down the 2016 Statewide PA that is referenced in the letter that provides for the abbreviated consultation process. If there is any way you could send that to me for my own records I would greatly appreciate it.

Based on the information sent, we do **concur that there will be adverse effects to historic properties**. Some of these effects can be mitigated through the protocol set forth in the letter (and apparently also in the 2016 Statewide PA). Therefore, the Muscogee (Creek) Nation has no objections to work and it may proceed as planned. Thank you for your time, I appreciate it greatly.

**Turner W. Hunt**  
*Archaeological Technician*  
Muscogee (Creek) Nation  
Historic & Cultural Preservation Department  
P.O. Box 580  
Okmulgee, OK 74447  
(918) 732-7759

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**From:** [Cramer, Jerame](#)  
**To:** [Wyma, Cornelia \(CTR\)](#)  
**Subject:** FW: FEMA 106: Adverse Effect for CNO/SWBNO JIRR (PW#s 21031 and 21032)  
**Date:** Friday, December 14, 2018 8:13:59 AM  
**Attachments:** [image001.png](#)

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**From:** Lindsey Bilyeu [mailto:[lbilyeu@choctawnation.com](mailto:lbilyeu@choctawnation.com)]  
**Sent:** Friday, December 7, 2018 12:30 PM  
**To:** Cramer, Jerame <[Jerame.Cramer@fema.dhs.gov](mailto:Jerame.Cramer@fema.dhs.gov)>  
**Subject:** RE: FEMA 106: Adverse Effect for CNO/SWBNO JIRR (PW#s 21031 and 21032)

Mr. Cramer,

The Choctaw Nation of Oklahoma thanks FEMA for the correspondence regarding the above referenced project. The Choctaw Nation has read the document and we concur with the stipulations that have been set forth.

If you have any questions, please contact me.

Thank you,

Lindsey D. Bilyeu, MS  
Senior Compliance Review Officer  
Historic Preservation Department  
Choctaw Nation of Oklahoma  
P.O. Box 1210  
Durant, OK 74702  
580-924-8280 ext. 2631



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**From:** Krishnan, Alice-Anne [mailto:[Alice-Anne.Krishnan@fema.dhs.gov](mailto:Alice-Anne.Krishnan@fema.dhs.gov)]  
**Sent:** Tuesday, November 06, 2018 4:56 PM  
**To:** Lindsey Bilyeu <[lbilyeu@choctawnation.com](mailto:lbilyeu@choctawnation.com)>  
**Subject:** FEMA 106: Adverse Effect for CNO/SWBNO JIRR (PW#s 21031 and 21032)

**Halito:** 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.

Dear Ms. Bilyeu:

Attached please find FEMA's letter regarding the below project:

RE: Section 106 Review Consultation, Hurricane Katrina, FEMA-1603-DR-LA  
Applicants: City of New Orleans and Sewerage and Water Board of New Orleans  
Undertaking: Joint Infrastructure Recovery Request Project (JIRR) New Orleans, Orleans Parish,

Louisiana (PWs 21031 and 21032)

Determination: Adverse Effect to Historic Properties

We look forward to your concurrence with this determination. Should you have any questions or need additional information regarding this Undertaking, please contact me or Amber Martinez at (504) 256-3801 or [Amber.Martinez2@fema.dhs.gov](mailto:Amber.Martinez2@fema.dhs.gov).

Sincerely,

AA

*Alice-Anne Krishnan, MPS, CFM*  
*Environmental/Historic Preservation Specialist*  
EHP-FEMA, New Orleans  
1603/1607-DR-LA  
cell: (504) 491-1395 (Wed, Thu telework)  
email: [alice-anne.krishnan@fema.dhs.gov](mailto:alice-anne.krishnan@fema.dhs.gov)

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**Governor's Office of Homeland Security  
and Emergency Preparedness  
State of Louisiana**

JOHN BEL EDWARDS  
GOVERNOR



JAMES B. WASKOM  
DIRECTOR

November 14, 2018

Mr. Jerame J. Cramer  
EHP Program Lead Louisiana  
FEMA  
1500 Main Street  
Baton Rouge, Louisiana 70802

SUBJECT: Section 106 Review Consultation, Hurricane Katrina; Adverse Effect to Historic Properties; City of New Orleans (CNO) and Sewerage and Water Board of New Orleans (SWBNO); Joint Infrastructure Recovery Request (JIRR) Road Repairs; FIPS #: 071-55000-00 and 071—06A69-00; FEMA-1603-DR-LA; Project Work Sheet #s 21031 & 21032

Dear Mr. Cramer,

This letter is to provide concurrence and lodge into record a correction to the November 6, 2018, Accelerated Consultation Process (ACP) letter without requesting formal revision of ACP.

GOHSEP does not wish to delay progress for moving the JIRR project work forward. We concur with the terms and intentions of the ACP. However, a review of the ACP revealed that an error was made under the Cultural Resources Context Statement section. The instructions for delivery of the Context Statement's final copy does not include copy to GOHSEP.

At a meeting on November 8, 2018, Ellen Ibert presented this concern and not wanting to revise the ACP to result in time delays. It was agreed at this meeting that GOHSEP would provide written record of correction to be attached to ACP.

We request that you note in the record that one digital copy of the context statement shall be provided to GOHSEP. A copy of this letter is provided to CNO for attaching to their ACP copy and supporting this request.

Do not hesitate to contact Ellen Ibert by email at [Ellen.Ibert@la.gov](mailto:Ellen.Ibert@la.gov) or telephone number (225) 334-7748 with any questions or concerns.

Sincerely,



Lynne Browning  
Assistant Deputy Director  
Public Assistance

LB:ei

Mr. Cramer – JIRR ACP Correction

November 14, 2018

Page 2 of 2

Attachments: AS

CC: LaNitrah Hasson, CNO Management Consultant  
Kelly Cryer, CNO Disaster Recovery Analyst  
Randi Jones, SWBNO DRS 2  
Wyma Cornella, FEMA EHP Contractor  
LaKeivea Warren, GOHSEP SAL  
Melvin Smith, GOHSEP PA Executive Officer