

ABBREVIATED RECORD OF ENVIRONMENTAL CONSIDERATION

See 44 Code of Federal Regulation Part 10.

Project Name/Number: EOR0988 Building 22/PW # 10379

Project Location: 615 City Park, New Orleans, Louisiana, Orleans Parish, Latitude: 29.98819, Longitude: -90.10497

Project Description: On August 29, 2005, Hurricane Katrina created severe winds and heavy rainfall which caused catastrophic damage to the roof of EOR0988 Building 22 at the City Park Campus of Delgado Community College. The scope of work includes replacing 3200 square feet of ceiling tiles, replacing two pairs of double doors with side panels, replacing 500 square feet of vinyl floor tiles, and installing 450 square feet of commercial grade carpet.

This project worksheet includes a Hazard Mitigation proposal for the school's maintenance personnel to build a temporary wind barrier made out of six 2x4s and two 4x8 sheets of 3/4 in plywood to be used when a hurricane or strong storm is imminent. The proposed installation would protect the doors from wind and wind born debris in the future.

Documentation Requirements

- (Short version)** All consultation and agreements implemented to comply with the National Historic Preservation Act, Endangered Species Act, and Executive Orders 11988, 11990 and 12898 are completed and no other laws apply. **(Review Concluded)**
- (Long version)** All applicable laws and executive orders were reviewed. Additional information for compliance is attached to this REC and/or included in project files, as applicable.

National Environmental Policy Act (NEPA) Determination

- Statutorily excluded from NEPA review. **(Review Concluded)**
- Programmatic Categorical Exclusion - **(Review Concluded)**
- Categorical Exclusion - Category
 - No Extraordinary Circumstances exist.
Are project conditions required? Yes (see section V) No **(Review Concluded)**
 - Extraordinary Circumstances exist (See Section IV).
 - Extraordinary Circumstances mitigated. (See Section IV comments)
Are project conditions required? Yes (see section V) No **(Review Concluded)**
- Environmental Assessment
- Supplemental Environmental Assessment (Reference EA or PEA in comments)
- Environmental Impact Statement

Comment: Although this project would have qualified as a CATEX(xv) and (xvi) under 44 CFR part 10.8 (d)(2), this project meets the definition of critical infrastructure (permanent schools) under the Alternative Arrangements for NEPA compliance. This project has conditions and requires mitigation under the other Environmental and Historic Preservation (EHP) Laws which are listed under the NEPA level of environmental review in the project worksheet. Any changes to this approved scope of work will require submission to, and evaluation and approval by, the state and FEMA prior to initiation of any work, for compliance with the National Environmental Policy Act. The applicant is required to obtain and comply with all local, state and federal permits and requirements. Non-compliance with the requirements noted above may jeopardize the receipt of federal funding.

HISTORIC BUILDINGS AND STRUCTURES

- No historic properties that are listed or 45/50 years or older in project area. **(Review Concluded)**
- Building or structure listed or 45/50 years or older in project area and activity not exempt from review.
 - Determination of No Historic Properties Affected (FEMA finding/SHPO/THPO concurrence on file)
Are project conditions required? Yes (see section V) No **(Review Concluded)**
 - Determination of Historic Properties Affected (FEMA finding/SHPO/THPO concurrence on file)
 - Property a National Historic Landmark and National Park Service was provided early notification during the consultation process. If not, explain in comments
 - No Adverse Effect Determination (FEMA finding/SHPO/THPO concurrence on file).
Are project conditions required? Yes (see section V) No **(Review Concluded)**
 - Adverse Effect Determination (FEMA finding/SHPO/THPO concurrence on file)
 - Resolution of Adverse Effect completed. (MOA on file)
Are project conditions required Yes (see section V) No **(Review Concluded)**

Comments: This scope of work has been reviewed and meets the criteria in Appendix A. Programmatic Allowances, Items (II)(A)(3&4), and (II) (C) (1) of FEMA'S Programmatic Agreement (PA) dated December 3, 2004. In accordance with the PA, FEMA is not required to determine the National Register Eligibility of properties where work performed meets the Appendix A criteria. In keeping with the stipulations of the PA, all proposed repair activities should be done in-kind to match existing materials and form this concludes the Section 106 Review for this project.

Correspondence/Consultation/References: Determination made by Chelsea Klein, Historic Preservation Specialist

ARCHEOLOGICAL RESOURCES

- Project affects only previously disturbed ground. **(Review Concluded)**
- Project affects undisturbed ground.
 - Project area has no potential for presence of archeological resources
 - Determination of no historic properties affected (FEMA finding/SHPO/THPO concurrence or consultation on file). **(Review Concluded)**
 - Project area has potential for presence of archeological resources
 - Determination of no historic properties affected (FEMA finding/SHPO/THPO concurrence on file)
Are project conditions required Yes (see section V) No **(Review Concluded)**
 - Determination of historic properties affected
 - NR eligible resources not present (FEMA finding/SHPO/THPO concurrence on file).
Are project conditions required Yes (see section V) No **(Review Concluded)**
 - NR eligible resources present in project area. (FEMA finding/ SHPO/THPO concurrence on file)
 - No Adverse Effect Determination. (FEMA finding/ SHPO/THPO concurrence on file)
Are project conditions required? Yes (see section V) No **(Review Concluded)**
 - Adverse Effect Determination. (FEMA finding/ SHPO/THPO concurrence on file)
 - Resolution of Adverse Effect completed. (MOA on file)
Are project conditions required? Yes (see section V) No **(Review Concluded)**

Comments: None

Correspondence/Consultation/References: Damage description and scope of work for PW # 10379.

THREATENED AND ENDANGERED SPECIES

- No listed species and/or designated critical habitat present in areas affected directly or indirectly by the Federal action. **(Review Concluded)**
- Listed species and/or designated critical habitat present in the areas affected directly or indirectly by the Federal action.
 - No effect to species or designated critical habitat. (See comments for justification)
Are project conditions required? Yes (see section V) No **(Review Concluded)**
 - May affect, but not likely to adversely affect species or designated critical habitat (FEMA determination/USFWS/NMFS concurrence on file) **(Review Concluded)**
Are project conditions required? Yes (see section V) No **(Review Concluded)**
 - Likely to adversely affect species or designated critical habitat
 - Formal consultation concluded. (Biological Assessment and Biological Opinion on file)
Are project conditions required? YES (see section V) NO **(Review Concluded)**

Comments: Listed species habitat does not occur in or near this site, thus this project will have no effect to threatened or endangered species.
Correspondence/Consultation/References: USFWS emergency consultation provisions determined in letter dated September 15, 2005.

E.O. 11988 – FLOODPLAINS

- No Effect on Floodplains/Flood levels and project outside Floodplain - **(Review Concluded)**
- Located in Floodplain or Effects on Floodplains/Flood levels
 - No adverse effect on floodplain and not adversely affected by the floodplain. **(Review Concluded)**
Are project conditions required? Yes (see section V) No **(Review Concluded)**
 - Beneficial Effect on Floodplain Occupancy/Values **(Review Concluded)**.
 - Possible adverse effects associated with investment in floodplain, occupancy or modification of floodplain environment
 - 8 Step Process Complete - documentation on file
Are project conditions required? YES (see section V) NO **(Review Concluded)**

Comments: The site is located in Zone "A3", area of 100-year flood, base flood elevations and flood hazard factors determined.
Correspondence/Consultation/References: FEMA Flood Insurance Rate Map, Community Panel No. 22252030095E revised 3/1/1984.

E.O. 11990 – WETLANDS

- No Effects on Wetland(s) and project located outside Wetland(s) - **(Review Concluded)**
- Located in Wetland or effects Wetland(s)
 - Beneficial Effect on Wetland - **(Review Concluded)**
 - Possible adverse effect associated with constructing in or near wetland
 - Review completed as part of floodplain review
 - 8 Step Process Complete - documentation on file
Are project conditions required? YES (see section V) NO **(Review Concluded)**

Comments: Project scope will not cause the destruction, loss or degradation of Wetlands.
Correspondence/Consultation/References: USFWS NWI map accessed on-line
<http://wetlandsfws.er.usgs.gov/wtlnds/launch.html> 09/05/06

E.O. 12898 - Environmental Justice For Low Income and Minority Populations

- No Low income or minority population in, near or affected by the project - **(Review Concluded)**
- Low income or minority population in or near project area
 - No disproportionately high and adverse impact on low income or minority population- **(Review Concluded)**
 - Disproportionately high or adverse effects on low income or minority population
Are project conditions required? YES (see section V) NO **(Review Concluded)**

Comments: The percent populations of 70119 are: 72.1% African American, 23.1% White and 0.3% Asian. The median household income in 1999 was \$21,297 and 29.2 % of families are below poverty level.
Correspondence/Consultation/References: U.S. Census bureau 2000 data at <http://factfinder.census.gov>, referenced 09/05/2006.

OTHER RELEVANT LAWS AND ENVIRONMENTAL REGULATIONS

- No impacts to other substantive laws/Executive Orders identified. Review concluded.
 Other applicable substantive laws/Executive Orders. (Identify law/E.O. and conditions if any below).

Comments : C.Z.M.A. – Coastal Zone Management Act

This project is located within the Louisiana Coastal Management Zone. Louisiana Department of Natural Resources (LA DNR) has determined that receipt of Federal Assistance is consistent with the Louisiana Coastal Resource Program. Projects within the Coastal Zone may still require a Coastal Use Permit or other authorization from (LA DNR). Projects may be coordinated by contacting LA DNR at 1-800-267-4019.

R.C.R.A – Resource Conversation and Recovery Act

Unusable equipment, debris and material shall be disposed of in an approved manner and location. In the event significant items (or evidence thereof) are discovered during implementation of the project the applicant shall handle, manage, and dispose of petroleum products, hazardous materials and/or toxic waste in accordance to the requirements and to the satisfaction of the governing local, state and federal agencies.

F.T.I.A. Formosan Termite Initiative Act

In accordance with the Formosan Termite Initiative Act, (LA R.S. 3:3391.1 through 3391.13) the Louisiana Parish of Orleans is under quarantine. The movement of wood or cellulose material, temporary housing or architectural components (e.g. beams, doors and other wood salvage from a structure) may not leave the quarantined parish without written authorization from the commissioner of the Louisiana Department of Agriculture and Forestry or his designee(s).

Correspondence/Consultation/Reference: Damage description and scope of work for project worksheet # 10379

V. ENVIRONMENTAL REVIEW PROJECT CONDITIONS

Project Conditions:

In addition, the following conditions apply as a condition of FEMA funding reimbursement:

- This project is located within the Louisiana Coastal Management Zone. Louisiana Department of Natural Resources (LA DNR) has determined that receipt of Federal Assistance is consistent with the Louisiana Coastal Resource Program. Projects within the Coastal Zone may still require a Coastal Use Permit or other authorization from (LA DNR). Projects may be coordinated by contacting LA DNR at 1-800-267-4019.
- Unusable equipment, debris and material shall be disposed of in an approved manner and location. In the event significant items (or evidence thereof) are discovered during implementation of the project applicant shall handle, manage, and dispose of petroleum products, hazardous materials and/or toxic waste in accordance to the requirements and to the satisfaction of the governing local, state and federal agencies.
- In accordance with the Formosan Termite Initiative Act, (LA R.S. 3:3391.1 through 3391.13) the Louisiana Parish of Orleans is under quarantine. The movement of wood or cellulose material, temporary housing or architectural components (e.g. beams, doors and other wood salvage from a structure) may not leave the quarantined parish without written authorization from the commissioner of the Louisiana Department of Agriculture and Forestry or his designee(s).
- In keeping with the stipulations of the PA, all proposed repair activities should be done in-kind to match existing materials and form.

No extraordinary circumstances as described in 44 CFR 10.8(d)(3) were identified during project review.

REVIEWER AND APPROVALS

FEMA Environmental Reviewer.

Name: Gloria Laynes, Environmental Specialist

Signature Gloria Laynes . Date 9-27-06

FEMA Regional Environmental Officer or delegated approving official.

Name:

Signature _____ . Date _____