



FEMA

June 30, 2006

Johnny Gonzales
GOHSEP PAO
FEMA-1603-DR-LA
415 N. 15th Street
Baton Rouge, Louisiana 70802

RE: Alternative Arrangements, Reconstruction of Critical Infrastructure in the New Orleans Metropolitan Area, Ernest N. Morial Elementary School-Modular Classrooms (2), Orleans Parish School Board, Orleans Parish, Louisiana, PW#: 8763, FEMA-1603-DR-LA, PA ID: 071-UFTI3-00

Dear Mr. Gonzales:

The purpose of this letter is to notify you that the Public Assistance project for the Ernest N. Morial Elementary School-Modular Classrooms (2) of Orleans Parish School Board at 701 Grant Street, New Orleans LA 70126, Orleans Parish (N: 30.01744, W: -89.99754) qualifies for the National Environmental Policy Act (NEPA) Alternative Arrangements for the Reconstruction of Critical Infrastructure in the New Orleans Metropolitan Area.

Under the regular Federal Emergency Management Agency (FEMA) NEPA review this project would have qualified for Level II Categorical Exclusion. However, due to the unprecedented amount of grants requested that need to be processed in a short time, the potential cumulative effects, and the potential environmentally related socio-economic effects of FEMA's funding in the New Orleans Metropolitan Area, FEMA has determined that this type of action may have significant impacts that cannot be reviewed under the normal Environmental Impact Statement (EIS) process. FEMA, Department of Homeland Security (DHS), and the Council on Environmental Quality (CEQ) have adopted the Alternative Arrangements to address the basic elements of NEPA under these circumstances. For more information visit www.fema.gov/plan/ehp/noma/index.shtm.

While the use of Alternative Arrangements meets NEPA compliance requirements, there are requirements of other Environmental and Historic Preservation (EHP) laws and executive orders that must be individually complied with. For the work described in this project worksheet (PW) the following conditions relating to those requirements apply:

- This project involves the demolition or renovation of a public structure. Regardless of the asbestos content, the applicant is responsible for ensuring that renovation or demolition activities are coordinated with the Louisiana Department of Environmental Quality (LDEQ) in accordance with the LDEQ "Fifth Amended Declaration of Emergency and Administrative Order" dated March 31, 2006, and the LESHAP protocol dated March 1, 2006, incorporating the provisions of EPA's National Emission Standards for Hazardous Air Pollutants (NESHAP) and the Louisiana Administrative Code (LAC) 33.III.5151 and Chapter 27. Should Asbestos Containing Materials (ACMs) be present at the project site, the applicant is also responsible for ensuring proper disposal in accordance with the previously referenced administrative orders.
- Applicant shall handle, manage, and dispose of potentially hazardous waste, universal waste, and hazardous materials in accordance with the requirements of local, state, and federal regulations. These materials may include but are not limited to asbestos, lead-based paint, laboratory reagents, propane cylinders, paints and solvents, coolants containing chlorofluorocarbons (cfc), used oil, polychlorinated biphenyls (pcbs), other petroleum products, used oil filters, fuel filters, cleaning chemicals, pesticides, batteries, and unlabeled tanks and containers. Equipment that may include these materials are ice

machines, refrigerators, generators, computers, televisions, mercury switches, fluorescent lights, fluorescent light ballasts, sandblast units, paint sprayers, etc.

- There are no known archaeological sites within .5 miles of the project area. Demolition must follow the lower impact demolition stipulations & additional protocols which are attached. The stipulations and protocols should be explicit in the demolition contract. Failure to comply with these stipulations & additional protocols will jeopardize receipt of federal funding. If during the course of work, archaeological artifacts (prehistoric or historic) or human remains are discovered, the applicant shall stop work in the vicinity of the discovery and take all reasonable measures to avoid or minimize harm to the finds. The applicant shall inform their Public Assistance (PA) contacts FEMA, who will in turn contact FEMA historic preservation staff. The applicant will not proceed with work until FEMA historic preservation staff have completed consultation with the Louisiana State Historic Preservation Officer (SHPO). In addition, if unmarked graves are present, compliance with the Louisiana Unmarked Human Burial Sites Preservation Act (R.S. 8:671 et seq.) is required. The applicant shall notify the law enforcement agency of the jurisdiction where the remains are located within twenty-four hours of the discovery. The applicant shall also notify FEMA and the Louisiana Unmarked Burial Sites Board (call the Louisiana Division of Archeology at 225-342-8170) within seventy-two hours of the discovery. If this scope of work and/or the footprint/location of the new building changes, this project will need to be resubmitted for further Section 106 review prior to ground disturbing activities taking place outside of the pre-disaster footprint of the building.
- Applicant is required to coordinate with local floodplain administrator regarding floodplain permit(s) prior to the start of any activities. Applicant is responsible for meeting all requirements of the permit(s). All coordination pertaining to these permit(s), should be documented to the local floodplain administrator and copies provided to Louisiana Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP) and FEMA as part of the permanent project files. In compliance with E0 11988, a completed 8-step process showing considered alternatives is attached. Per 44 CFR 9.11 alternatives were reviewed. Per 44 CFR 9.11(d)(9), the replacement of building contents, materials and equipment, where possible, disaster proofing of the building and/or elimination of such future losses by relocation of those building contents, materials and equipment to or above the advisory base floodplain. Per 44 CFR 9.12, applicant must publish a final public notice 15 days prior to the start of construction activities. Final public notice is to be forwarded to the LA GOHSEP and FEMA for inclusion in the permanent project files.

Please note that this transmittal is a notification that this project has been cleared under NEPA only. **This is not a notice of final approval or eligibility.** Any change beyond the approved scope of work for this project will require additional environmental review by FEMA.

Sincerely,



for Donald R. Fairley, REM
Environmental Liaison Officer
FEMA-1603/1607-DR-LA

Enclosures:

1. Project Worksheet
2. REC dated: 6/30/2006