Parish: Plaquemines

Record of Environmental Consideration

REVISED FOR FEMA ENVIRONMENTAL - LOUISIANA - 2006

See 44 Code of Federal Regulation Part 10							
Pro	ject Name/Number:	Port Sulphur High School - High School and Industrial Arts Building / PW#7297 FIPS#075-U5R52-00					
Project Location:		164 School Road, Port Sulphur, LA 70083, Plaquemines Parish Latitude: 29.47725, Longitude: -89.69495					
and Sche meta othe map don unde	al fascia, window panes/fra er interior components. Haz ele floor. The synthetic floo have the sports floor instal	Heavy rains and high winds from Hurricane Katrina (DR-1603) caused significant exterior liphur High School - High School and Industrial Arts Building of the Plaquemines Parish reses the eligible applicant for repair and/or removal/replacement of roofing components, mes, acoustical ceiling tiles, insulation, flooring, doors, drywall, shelving, appliances, and ard mitigation will be achieved by installing a synthetic sports floor following removal of the or is not affected by being submerged in floodwater as evident at other parish schools which and experienced flooding. Work will entail removal of the existing maple flooring and synthetic sports floor. All work will be performed in a previously disturbed area with no or other bodies of water.					
<u>Do</u>	Documentation Requirements						
	(Short version) All co Act, Endangered Species (Review Concluded)	nsultation and agreements implemented to comply with the National Historic Preservation Act, and Executive Orders 11988, 11990 and 12898 are completed and no other laws apply.					
\boxtimes	(Long version) All ap attached to this REC and/o	plicable laws and executive orders were reviewed. Additional information for compliance is or included in project files, as applicable.					
<u>Na</u>	tional Environn	nental Policy Act (NEPA) Determination					
	Programmatic Categorical Categorical Exclusion - No Extraordinary Circum Extraordinary Circum Extraordinary Circum Are project condition Are project condition Are project condition	Category recumstances exist. as required? Yes (see section V) No (Review Concluded) stances exist (See Section IV). ircumstances mitigated. (See Section IV comments) ditions required? Yes (see section V) No (Review Concluded) at the section (Reference EA or PEA in comments)					
Comi	ments: This project meets onditions and requires mitig	the criteria for the alternative arrangement, permanent school, type of project. This project gation under the other EHP laws.					
Rev	viewer and App	rovals					
	Project is Non-Compliant	(See attached documentation justifying selection).					
FEMA Environmental Reviewer: Name: Adam Bordon, FEMA- Environmental Specialist Signature							
		Date 1 0 0					

FEMA Regional Environmental Officer or Delegated Approving Official:

Project Name/Env. Database No: Port Sulphur High School

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Name: Don Fairley, Environmental Liason Officer Signature Date 7.8.06 Compliance Review for Environmental Laws (other than NEPA) I. A. National Historic Preservation Act (NHPA) Not type of activity with potential to affect historic properties. Activity meets Programmatic Agreement, December 3, 2004. Appendix A: Are project conditions required? Yes (see Section V) No Programmatic Agreement not applicable, must conduct standard Section 106 Review. 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). Adverse Effect Determination (FEMA finding/SHPO/THPO concurrence on file) Resolution of Adverse Effect completed. (MOA on file) Are project conditions required \(\subseteq \text{Yes (see Section V)} \) \(\subseteq \text{No (Review Concluded)} \) 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 \(\subseteq \text{Yes (see Section V)} \) \(\subseteq \text{No (Review Concluded)} \) 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: The property has been determined by FEMA to be not eligible for listing in the National Register or located within the boundaries of a National Register district. Concurrance with this determination was received from the SHPO dated 3.28.06. In keeping with this determination, the proposed project will have no effect on historic resources. This concludes the Section 106 review for this project.

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Correspondence/Consultation/References: NHPA effect determinations made by James Crouch, FEMA Historic Preservation Specialist.				
B. Endangered Species Act 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: Project is located in an urban or previously developed area. Neither listed species nor their habitat occur in or near this site, thus FEMA finds there will be no effect to threatened or endangered species. Correspondence/Consultation/References: USFWS emergency consultation provisions determined in letters dated September 15, 2005 for Katrina.				
C. Coastal Barrier Resources Act ☐ Project is not on or connected to CBRA Unit or Otherwise Protected Area (Review Concluded). ☐ Project is on or connected to CBRA Unit or Otherwise Protected Area. (FEMA determination/USFWS consultation on file) ☐ Proposed action an exception under Section 3505.a.6 (Review Concluded) ☐ Proposed action not excepted under Section 3505.a.6. Are project conditions required? ☐ YES (see Section V) ☐ NO (Review Concluded)				
Comments: Project is not within a CBRA zone. Correspondence/Consultation/References: Louisiana Coastal Barrier Resource System Maps referenced 07/07/06.				
 D. Clean Water Act 				
Comments: No jurisdictional waters of the U.S., including wetlands, occur in or near the project area. Correspondence/Consultation/References: USFWS National Wetlands Inventory map (http://www.fws.gov/nwi/) queried on 07/07/06.				
E. Coastal Zone Management Act ☐ Project is not located in a coastal zone area and does not affect a coastal zone area (Review concluded) ☐ Project is located in a coastal zone area and/or affects the coastal zone ☐ State administering agency does not require consistency review. ☐ State administering agency requires consistency review. Are project conditions required? ☐ YES (see Section V) ☐ NO (Review Concluded)				
Comments: This project is located within the Louisiana Coastal Management Zone. LA Department of Natural Resources (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 DNR. Projects may be coordinated by contacting LA DNR at 1-800-276-4019.				

Parish: Plaquemines Correspondence/Consultation/References: LDNR Louisiana Coastal Zone map 2002. F. Fish and Wildlife Coordination Act Project does not affect, control, or modify a waterway/body of water. (Review Concluded) Project affects controls or modifies a waterway/body of water. ☐ Coordination with USFWS conducted No Recommendations offered by USFWS. (Review Concluded) Recommendations provided by USFWS. Comments: No streams or water bodies are located in or near the project area. Correspondence/Consultation/References: Louisiana Map (http://wwwlamap.doa.louisiana.gov/) queried 07/07/06. G. Clean Air Act Project will not result in permanent air emissions. (Review Concluded) Project is located in an attainment area. (Review Concluded) Project is located in a non-attainment area. Coordination required with applicable state administering agency. Are project conditions required? YES (see section V) NO (Review Concluded) Comments: 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 "Sixth 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. Correspondence/Consultation/References: EPA Region 6 Non-attainment Map. H. Farmland Protection Policy Act Project does not affect designated prime or unique farmland. (Review Concluded) Project causes unnecessary or irreversible conversion of designated prime or unique farmland. Coordination with Natural Resource Conservation Commission required. Farmland Conversion Impact Rating, Form AD-1006, completed. Comments: The project site is in a developed urbanized area and Farmland Protection Policy Act (FPPA) is precluded. No prime or unique farmland present. Correspondence/Consultation/References: National Resource Conservation Service, Web Soil Survey (http://websoilsurvey.nrcs.usda.gov/app/)referenced 07/07/06. I. Migratory Bird Treaty Act Project not located within a flyway zone. (Review Concluded) Project located within a flyway zone. Project does not have potential to take migratory birds. (Review Concluded) Are project conditions required? Yes (see section V) No (Review Concluded) Project has potential to take migratory birds. Contact made with USFWS Are project conditions required? YES (see section V) NO (Review Concluded) Comments: The site is an existing disturbed area with little value to migratory birds and would not be included in the USFWS migratory bird management program. Correspondence/Consultation/References: USFWS guidance letter dated September 15, 2005 for Katrina

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J. Magnuson-Stevens Fishery Conservation and Management Act Project not located in or near Essential Fish Habitat. (Review Concluded) Project located in or near Essential Fish Habitat. Project does not adversely affect Essential Fish Habitat. (Review Concluded) Are project conditions required? ☐ Yes (see Section V) ☐ No (Review Concluded) Project adversely affects Essential Fish Habitat (FEMA determination/USFWS/NMFS concurrence on file) NOAA Fisheries provided no recommendation(s) (Review Concluded). Are project conditions required? ☐ Yes (see Section V) ☐ No (Review Concluded) Written reply to NOAA Fisheries recommendations completed. Are project conditions required? ☐ YES (see Section V) ☐ NO (Review Concluded)
Comments: Project is not located in or near any surface waters with the potential to affect EFH species. Correspondence/Consultation/References: Louisiana Map (http://www.lamap.doa.louisiana.gov/) referenced 07/07/06.
 K. Wild and Scenic Rivers Act
Comments: None Correspondence/Consultation/References: National Wild and Scenic Rivers http://www.nps.gov/rivers/wildriverslist.html . referenced 07/07/06.
L. Other Relevant Laws and Environmental Regulations
State Hazardous Materials and Solid Waste Laws Comments: 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 (cfcs), 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.
- This project involves the demolition or renovation of a public structure that may contain surfaces coated with lead-based paint (LBP). Activities involving abrading (sanding, scraping, etc.), heating, stripping, or otherwise concentrating LBP shall comply with applicable provisions of 29 CFR parts 1910 and 1926 (OSHA - worker safety), and 40 CFR 260 through 268 (EPA - hazardous waste). The applicant is responsible for ensuring that project activities are coordinated with the Louisiana Department of Environmental Quality for abatement activities and is also responsible for ensuring proper disposal in accordance with the previously referenced regulations.
In accordance with the Formosan Termite Initiative Act, (LA R.S. 3:3391.1 thru 3391.13) the Louisiana parishes of Calcasieu, Cameron, Jefferson Davis, Orleans, Jefferson, Plaquemines, St. Bernard, St. Charles, St. John the Baptist, St. Tammany, Tangipahoa and Washington are under quarantine. The movement of wood or cellulose material, temporary housing or architectural components (e.g. beams, doors and other wood salvaged from a structure) may not leave the quarantined parishes without written authorization from the commissioner of the Louisiana Department of Agriculture and forestry or his designee(s).
- Mercury containing devices - this project potentially involves the disposal of metallic mercury containing electronic devices. The applicant is responsible for ensuring that these devices are recovered, recycled, reused or sequestered in

accordance with the Louisiana Department of Environmental Quality (LDEQ) "Declaration of Emergency; mercury-

containing devices and electronic equipment as universal waste" letter dated October 3, 2005.

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II. Compliance Review for Executive Orders

A. 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					
Are project conditions required? XYES (see Section V) NO (Review Concluded)					
Comments: The site is located in Zone A99.					
http://store.msc.fema.gov/webapp/wcs/stores/servlet/FemaWelcomeView?storeId=10001&catalogId=10001&langId=-1,					
Plaquemines parish enrolled in the National Flood Insurance Program 05/01/85. Per Flood Insurance Rate Map 220139					
10055C, dated 09/30/93, project is located in zone A99, area of 100-yr flood protected by flood protection system under					
construction; base flood elevations and flood hazard factors not determined. Project is to repair the building in its present					
location. Per 44 CFR 9.11, to prevent future damages all contents, materials and equipment should, where possible, he					
elevated, relocated or flood proofed.					
Correspondence/Consultation/References: FEMA Flood Insurance Rate Map. Community Panel No. # 220139 0655C					
dated 09/30/93					
B. E.O. 11990 - Wetlands					
No Effects on Wetland(s) and project located outside Wetland(s) - (Review Concluded) Located in Wetland or effects Wetland(s)					
Reneficial Effect on Western Country Devices Country Devices					
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: No wetlands were observed during gits visit or determined to be a second of the second of					
Comments: No wetlands were observed during site visit or determined to be present by checking the USFWS National Wetlands Inventory (NWI) maps.					
Correspondence/Consultation/References: USFWS NWI map accessed on-line					
(http://wetlandsfws.er.usgs.gov/wtlnds/launch.html) 07/07/06.					
Company of the series of the s					
C FO 12000 Environmental Toutie C I I					
C. 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 70083 are: 45.2% white, 43.9% black and 7.6% American Indian. The median					
nousehold income in 1999 was \$ 29,714 and 20.9 % of families are below poverty level.					
Correspondence/Consultation/References: U.S. Census bureau 2000 data at http://factfinder.census.gov, referenced					
07/07/06.					

III. Other Environmental Issues

Identify other potential environmental concerns in the comment box not clearly falling under a law or executive order (see environmental concerns scoping checklist for guidance).

Project Name/Env. Database No: Port Sulphur High School PW#7297 Parish: Plaquemines

State Hazardous Materials and Solid Waste Laws

Comments: 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 cylnders, paints and solvents, coolants containing chlorofluorocarbons (cfcs), 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.

- This project involves the demolition or renovation of a public structure that may contain surfaces coated with lead-based paint (LBP). Activities involving abrading (sanding, scraping, etc.), heating, stripping, or otherwise concentrating LBP shall comply with applicable provisions of 29 CFR parts 1910 and 1926 (OSHA worker safety), and 40 CFR 260 through 268 (EPA hazardous waste). The applicant is responsible for ensuring that project activities are coordinated with the Louisiana Department of Environmental Quality for abatement activities and is also responsible for ensuring proper disposal in accordance with the previously referenced regulations.
- In accordance with the Formosan Termite Initiative Act, (LA R.S. 3:3391.1 thru 3391.13) the Louisiana parishes of Calcasieu, Cameron, Jefferson Davis, Orleans, Jefferson, Plaquemines, St. Bernard, St. Charles, St. John the Baptist, St. Tammany, Tangipahoa and Washington are under quarantine. The movement of wood or cellulose material, temporary housing or architectural components (e.g. beams, doors and other wood salvaged from a structure) may not leave the quarantined parishes without written authorization from the commissioner of the Louisiana Department of Agriculture and forestry or his designee(s).
- Mercury containing devices this project potentially involves the disposal of metallic mercury containing electronic devices. The applicant is responsible for ensuring that these devices are recovered, recycled, reused or sequestered in accordance with the Louisiana Department of Environmental Quality (LDEQ) "Declaration of Emergency; mercury-containing devices and electronic equipment as universal waste" letter dated October 3, 2005.

Correspondence/Consultation/Reference:

IV. Extraordinary Circumstances

Based on the review of compliance with other environmental laws and Executive Orders, and in consideration of other environmental factors, review the project for extraordinary circumstances.

* A "Yes" under any circumstance may require an Environmental Assessment (EA) with the exception of (ii) which should be applied in conjunction with controversy on an environmental issue. If the circumstance can be mitigated, please explain in comments. If no, leave blank.

Y es	
	(i) Greater scope or size than normally experienced for a particular category of action
	(ii) Actions with a high level of public controversy
Ц	(iii) Potential for degradation, even though slight, of already existing poor environmental conditions;
	(iv) Employment of unproven technology with potential adverse effects or actions involving unique or unknown environmental risks;
	(v) Presence of endangered or threatened species or their critical habitat, or archaeological, cultural, historical or other protected resources;
	(vi) Presence of hazardous or toxic substances at levels which exceed Federal, state or local regulations or standards requiring action or attention;
	(vii) Actions with the potential to affect special status areas adversely or other critical resources
	such as wetlands, coastal zones, wildlife refuge and wilderness areas, wild and scenic rivers, sole or principal drinking water aquifers;
	(viii) Potential for adverse effects on health or safety; and

Reviewer Nan FEMA-1603/1	ne: Adam Borden, Environmental Specialist 607-DR-LA	Project Name/Env. Database No: Port Sulphur High School PW#7297		
	(ix) Potential to violate a federal, state, local or tribal law	Parish: Plaquemines Ocal or tribal law or requirement imposed for the		
	protection of the environment.	-		
	(x) Potential for significant cumulative impact when the pother past, present and reasonably foreseeable future action	roposed action is combined with ns, even though the impacts of the		
	proposed action may not be significant by themselves.			
Comments:	None		<u></u>	

V. Environmental Review Project Conditions

Project Conditions:

The following conditions apply as a condition of FEMA funding reimbursement:

- 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 (cfcs), 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.
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- Project is to repair the building in its present location. Per 44 CFR 9.11, to prevent future damages all contents, materials and equipment should, where possible, be elevated, relocated or flood proofed.