

ABBREVIATED RECORD OF ENVIRONMENTAL CONSIDERATION

See 44 Code of Federal Regulation Part 10.

Project Name/Number: Saint Rita School/ 000-UV6IX-00

Project Location: 65 Fontainebleau Dr., New Orleans, LA, Orleans Parish, Latitude: 29.94154, Longitude: 89.97318

Project Description: On August 29, 2005, Hurricane Katrina caused catastrophic damage which resulted in the following: St. Rita School experienced high winds and flooding. The flood water was 12 to 18 inches deep and remained approximately 2-weeks. The flood water caused damage to the air return system under the stage in the cafeteria; the standing brackish water etched the finish on the terrazzo floor in the cafeteria, flooded the elevator pit and equipment, damaged the boiler pumps, and flooded an a/c unit. High winds damaged three (3) a/c units on the roof and flashing on the garage.

The Hazard Mitigation for this PW, consists of elevating the exterior A/C condensing units to a height above the flood water. The concept is to construct a platform that will be mounted to the concrete slab already present and attached to the building brick surface that will support the condensing unit. The unit will be 3ft x 4ft and capable of supporting up to a 5 ton condensing unit. There is one of these units.

This project would have normally qualified for Categorical Exclusion documentation Level III under Environmental Historic Preservation (EHP). The project now meets the criteria for an Alternative Arrangement for the Reconstruction of Physical Critical Infrastructure in the New Orleans Metropolitan Area Permanent Schools type of project. This project has conditions and requires mitigation under other (EHP) laws. Project conditions are obligatory and are listed under Section {V} of this Record of Environmental Consideration.

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 - Category (Reference PCE in comments) **(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

Comments: This project meets the criteria for an Alternative Arrangement Permanent Schools type of project. This project has conditions and requires mitigation under other Environmental Historic Preservation (EHP) laws.

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, Item II, Section {A-2}{B-1}{h}, 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.
Correspondence/Consultation/References: NHPA effect determinations made by Derek A. Galose , FEMA 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:

Correspondence/Consultation/References:

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 letters 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 B.

Correspondence/Consultation/References: FEMA Flood Insurance Rate Map, Community Panel No. 225203 0160 E, revised 03/01/1984.

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: No wetlands were observed during site visit or determined to be present by checking the USFWS National Wetlands Inventory (NWI) maps.

Correspondence/Consultation/References:

1) USFWS NWI map accessed on-line (<http://wetlandsfws.er.usgs.gov/wtlnds/launch.html>) 7-5-06.

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 Orleans Parish are: 67.3% Black, 28.1% White and .9% some other race. The median household income in 1999 was \$ 32,338 and 23.7 % of families are below poverty level.

Correspondence/Consultation/References: U.S. Census bureau 2000 data at <http://factfinder.census.gov>, referenced 7-5-06.

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: None

Correspondence/Consultation/Reference:

V. ENVIRONMENTAL REVIEW PROJECT CONDITIONS

Project Conditions:

This project must comply with all conditions of the attached Programmatic Categorical Exclusion. In addition, the following conditions apply as a condition of FEMA funding reimbursement:

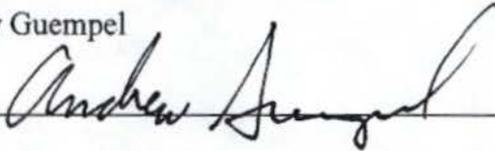
- This project is located within the Louisiana Coastal Management Zone. LA DNR has determined that receipt of federal assistance is consistent with the Louisiana Coastal Resource Program. Projects within the coastal zone may still require a Coastal Use Permit or other authorization from DNR. Projects 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 projects 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.
- 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 "fourth amended Declaration of Emergency and Administrative Order" dated January 13th 2005., 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 order.
- 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).

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

REVIEWER AND APPROVALS

FEMA Environmental Reviewer.

Name: Andrew Guempel

Signature  . Date 7-18-06 .

FEMA Regional Environmental Officer or delegated approving official.

Name: William Fagan

Signature  . Date 7/18/2006 .