

ABBREVIATED RECORD OF ENVIRONMENTAL CONSIDERATION

See 44 Code of Federal Regulation Part 10.

Project Name/Number: St. Dominick School Aquinas Hall/ PW #7400/000-UV6IX-00

Project Location: 6361 Memphis Street, New Orleans, Louisiana, Orleans Parish, Latitude: 30.00581, Longitude: -90.10538

Project Description: Hurricane Katrina DR #1603 struck St. Dominick School located at 6361 Memphis Street in New Orleans, Louisiana. At the time of the storm, Aquinas Hall, which contained approximately 5447 square feet, sustained wind damage and flood damage. The Dominic Aquinas Hall flooded to the depth of approximately 7 feet. The damage dimensions and description of this project include major damages to all interior components. This PW addresses the major modifications and repairs that will return the facility to its pre-disaster design, function and capacity.

This PW includes a Hazard mitigation proposal to replace solid wood doors with metal doors, raise electrical outlets, and substitute cement board with skim finishing for dry wall replacement. The proposed replacement will prevent rain intrusion in future wind driven rain events.

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

Comments: This project meets the criteria for an Alternative Arrangement Permanent School type of project. This project has conditions and requires Mitigation under the other Environmental and Historic Preservation 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, Items (II) (A) (1,2, & 4) (Repair/Replace buildings interior), (II) (B) (1 & 2) (Utilities, Mechanical and Electrical), (II) (C) (1 & 2) Windows and Doors), (II) (D) (2) (Repair/Replace Exterior), and (II) (H) (Contents) 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 from this concludes the Section 106 Review for this project.

Correspondence/Consultation/References: Consultation with 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: None

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: Project will have no affect on endangered species. No further consultation required
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 "A3", area of 100-yr flood and base flood elevations.
Correspondence/Consultation/References: FEMA Flood Insurance Rate Map, Community Panel No. 225203 0095 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 – 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>) 06/17/06.

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% African American, 28.1% White and 3.1% Hispanic. The median household income in 1999 was \$ 27,133 and 23.7% of families are below poverty level.
Correspondence/Consultation/References: U.S. Census bureau 2000 data at <http://factfinder.census.gov>, referenced 06/17/06.

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

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.

R.C.R.A. Resource Conservation 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 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 "declaration of emergency and administrative order" dated September 27, 2005. 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.

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: Louisiana Coastal Zone Map referenced 07/25/06. Project worksheet PW # 7400 damage description and scope of work.

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. 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 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 parishes without written authorization from the commissioner of the Louisiana Department of Agriculture and Forestry or his designee(s).
- Per 44 CFR 9.11 (d)(9), the replacement of building contents, materials and equipment should be, where possible, wet or dry-proofed, elevated, or relocated to or above the advisory base flood elevation (ABFE) per the ABFE maps. 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 Louisiana Governor's Office of Homeland Security and FEMA for inclusion in the permanent project files.
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- 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 "declaration of emergency and administrative order" dated September 27, 2005. 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.

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 8-16-06

FEMA Environmental Officer or delegated approving official.

Name: Wm. Fagan

Signature [Signature] Date 8/22/2006