

# ABBREVIATED RECORD OF ENVIRONMENTAL CONSIDERATION

See 44 Code of Federal Regulation Part 10.

**Project Name/Number:** Andrew Jackson High School-Main Bldg. "A" & Gym

**Project Location:** 201 8<sup>th</sup> Street, Chalmette, LA 70043, St. Bernard Parish, Latitude: 29.9361N, Longitude: 89.95351W

**Project Description:** Repair substantial wind and flood damage to the 97,000 square foot two-story main building and 33,000 square foot gymnasium, including roofs, exterior walls and windows, interior walls, floors and ceilings, plumbing and electrical. Three separate Hazard Mitigation Proposals provide: 1) elevating two chillers from grade level; 2) replacing flood damaged gypsum wallboard with concrete CMU Block to resist flood damage and mold growth; and 3) replacing existing windows with aluminum curtain wall system designed to resist winds up to 140 mph.

## 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 Schools type of project. This project has conditions and requires mitigation under the other 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:** Building is not 45 years or older and was constructed about 1965-66. Therefore this project does not have the potential to have effects on historic properties.

**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:** Repair is to pre-disaster condition on developed property.

**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:** 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:**

Streets & Trips Maps, aerial photographs, topographic maps..

**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". See Section V for conditions..

**Correspondence/Consultation/References:** FEMA Flood Insurance Rate Map, Community Panel No. 2252040290 C, revised 05/01/1985.

**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**)

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>) January 29, 2007.

**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 Zip Code 70043 are: 92.7% white, 2.4% African-American and 0.4% American Indian. The median household income in 1999 was \$ 36,999.00 and 9.2 % of families are below poverty level.

**Correspondence/Consultation/References:** U.S. Census bureau 2000 data at <http://factfinder.census.gov>, referenced January 29, 2007.

### **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:** See Section V. below.

**Correspondence/Consultation/Reference:**

### **V. ENVIRONMENTAL REVIEW PROJECT CONDITIONS**

#### **Project Conditions:**

##### Alternative Arrangements:

In order to comply with the NEPA process, and because of the potential for this project to have an adverse impact on the environment, including the social and economic environments, prior to initiating the project, the applicant must prepare a public involvement plan and conduct a public involvement process. FEMA's Environmental/Historical Preservation staff can provide guidance to determine how much and what type of public involvement is appropriate for a given project. If needed, the public outreach group can assist you in designing and implementing a public involvement program. Copies of any articles, public notices, meeting minutes, and public comments should be provided to FEMA to become part of the project record

##### Floodplains:

Applicant is required to coordinate and comply 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 LA GOHSEP and FEMA as part of the permanent project files.

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.

Elevation information, signed and sealed by a licensed surveyor, engineer, or architect must be obtained and filed for verification of compliance.

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

RCRA:

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

Coastal Zone:

This project is located within the Louisiana Coastal Management Zone. Louisiana 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 1-800-267-4019.

Clean Air Act:

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 "Seventh Amended Declaration of Emergency and Administrative order" dated August 24, 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

Formosan Termite:

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).

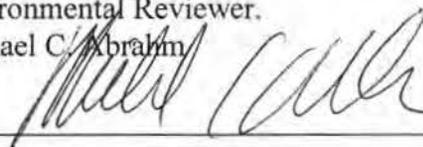
No extraordinary circumstances as described in 44 CFR 10.8(d)(3) were identified during project review.

**REVIEWER AND APPROVALS**

FEMA Environmental Reviewer,

Name: Michael C. Abrahm

Signature

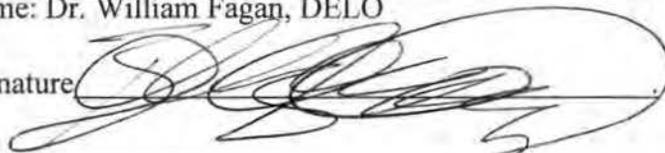


Date 01/30/2007

FEMA Regional Environmental Officer or delegated approving official.

Name: Dr. William Fagan, DELO

Signature



Date 01/31/2007