

Record of Environmental Consideration

REVISED FOR FEMA ENVIRONMENTAL -- LOUISIANA -- April 2007

See 44 Code of Federal Regulation Part 10

Project Name/Number: Orleans Parish School District / PW 19290
Single Settlement Request
FIPS#: 071-UFTI3-00/ Project #: 19290

Applicant Name: Orleans Parish School Board (OPSB)

Project Locations: Edward Hynes Elementary School - Location: 30.00315, -90.10122
990 Harrison Avenue, New Orleans, LA 70124

Edward H. Phillips Junior High School – Location: 29.99824, -90.08250
1200 Senate Street, New Orleans, LA 70122

Adjoined with the
Vorce J. Waters Elementary School – Location: 29.99635, -90.08229
3800 Cadillac Street, New Orleans, LA 70122

Project Description:

On August 29, 2005, Hurricane Katrina and its aftermath caused wind and flood damages to numerous public schools in New Orleans, Orleans Parish, LA. This Record of Environmental Consideration (REC) addresses the Applicant's "Single Settlement Request" (SSR) Version No. 0, Tranche No. 1 for FEMA grant funding to support reconstruction of schools in Orleans Parish following Hurricane Katrina.

This REC considers two proposed projects encompassing a total of three defined Orleans Parish School Board (OPSB) school sites described as follows:

(1) At the Edward Hynes Elementary School site the Applicant plans to demolish the existing building and rebuild on the same site a new/replacement 112,000 square foot elementary school (pre-K through 8th grade) building. The project entails construction of a new two-story facility elevated to the applicable base flood elevation. The school will house classrooms, science labs, a library/media center and computer labs, and arts and music facilities with flexible performance space. The facility will also feature a commercial kitchen and cafeteria, a gymnasium, and a stage as well as office space for administrative and student support services.

(2) At the Edward H. Phillips Junior High School and the adjoined Vorce J. Waters Elementary School sites the Applicant plans to demolish the existing school buildings and construct a single new 226,800 square foot senior high school (9th through 12th grades) building complex. The project entails construction of a new two-story facility elevated to the applicable base flood elevation. The school will support comprehensive college preparatory curricula and career technical education and will feature classrooms, science labs, a library/media center and computer labs, and arts, music and drama facilities as well as a full auditorium. The school will also support a commercial kitchen and cafeteria, practice and competition gymnasiums, as well as office space for administrative and student support services.

National Environmental Policy Act (NEPA) Determination

- Statutorily excluded from NEPA review (**Review Concluded**)
- Programmatic Categorical Exclusion - Category (**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**)

- Alternative Arrangements
 - Public Involvement Plan on file (see comments below)
 - 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: Based on documentation provided by the sub-applicant, FEMA's Environmental / Historic Preservation Section and Alternatives Arrangement team has determined that Orleans Parish has provided sufficient documentation to demonstrate a satisfactory public involvement process for rebuilding schools in Orleans Parish, LA. Any changes to the scope of work will require re-submission through the state to FEMA and requires re-evaluation for compliance with national environmental policies. The applicant is responsible for obtaining and complying with all local, state and federal permits. Non-compliance with this requirement may jeopardize receipt of federal funds.

Correspondence/Consultation/References:

- Project is Non-Compliant (see attached documentation justifying selection).

Reviewer and Approvals

FEMA Environmental Reviewer:

Name: Kelly E. Rowe, Environmental Specialist, FEMA LA RO

Signature  Date 8-20-10

FEMA Environmental Liaison Officer or Delegated Approving Official:

Name: Cynthia Teeter, Acting Environmental Liaison Officer, FEMA LA RO

Signature  Date 8-20-10

I. Compliance Review for Environmental Laws (other than NEPA)

A. National Historic Preservation Act (NHPA)

- Not type of activity with potential to affect historic structures or archaeological resources **(Review Concluded)**
- Applicable executed Programmatic Agreement. Activity meets Programmatic Allowance (date of agreement and allowance number in comments) - **Review Concluded**
- Applicable executed Programmatic Agreement (date in comments). See project review below for historic structures and archaeological resources.
- Other Programmatic Agreement dated _____ applies

HISTORIC BUILDINGS AND STRUCTURES

- No historic properties that are listed or 50 years or older in project area. **(Review Concluded)**
- Building or structure 50 years or older or listed on the National Register in the 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**)

ARCHEOLOGICAL RESOURCES

- Project affects only previously disturbed ground – Review Concluded*
- Project affects undisturbed ground or grounds associated with a historic structure
 - Project area has no potential for presence of archeological resources
 - Determination of no historic properties affected (FEMA finding/SHPO/THPO concurrence 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:

The Section 106 review of the proposed actions was conducted in accordance with the Secondary Programmatic Agreement among Federal Emergency Management Agency, State of Louisiana Division of Administration, Office of Community Development, Louisiana State Historic Preservation Officer, Advisory Council on Historic Preservation, Louisiana Department of Education through its Recovery School District (RSD), and Orleans Parish School Board (OPSB) Regarding implementation of School Facilities Master Plan for Orleans Parish dated August 17, 2009 (RSD/OPSB 2PA). The following comments reflect FEMA's Section 106 review of the proposed construction of new school facilities on two recipient sites and the reasonably foreseeable effects of those undertakings, including the contributing projects; 9 "brick and mortar", 14 "non-brick and mortar", 13 "non-educational" replacement buildings, and 41 "repair-open" buildings from which the funding for the construction of the 2 recipient schools will be drawn from.

In accordance with the RSD 2PA, FEMA has determined that no historic properties are affected by the construction of new schools on both the Hynes and Phillips/Waters Sites. The SHPO/Tribal documentation for these undertakings is attached to this PW 19290.

The scope of work for the contributing projects for this PW fall into one of three categories; continued use, demolish, or safe and secure. The "donor scope" for each of these projects is noted in attachment 06.

Continued Use

For schools in continued use, FEMA has documented the review of these repairs in their contributing PW. In accordance with Stipulation I.E of the RSD/OPSB 2PA FEMA has no additional Section 106 responsibilities for these previously reviewed undertakings unless RSD and/or OPSB propose changes to the scope of work that FEMA determines may cause additional effects to historic properties. The review comments and conditions in the contributing PW's are applicable. Any work not reviewed as part of this PW or in a contributing PW is either submitted as "recipient scope" to this PW or will be submitted in a future version to this PW.

Demolition/Safe and Secure

For schools with the donor scope of demolition and/or safe and secure, FEMA has determined that no historic properties are affected by the demolition of and/or the implementation of actions to make the buildings safe and secure. The individual reviews for these projects are both documented in the contributing PW and attached to this PW and include the following information: review comment and/or appropriate SHPO/Tribal consultation documents.

The non-destructive planning activities, i.e. Project Management and Architectural and Engineering (A&E) design fees for all schools, meets the Programmatic Allowances, Item VII.D of the RSD Secondary Programmatic Agreement. FEMA will work with the applicant and their A&E firms to ensure future work is in compliance with the RSD/OPSB 2PA. - Amber Martinez, Historic Preservation Specialist
Correspondence/Consultation/References: Amber Martinez, 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 sites are 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 sites are not within a CBRA zone.

Correspondence/Consultation/References: Louisiana Coastal Barrier Resource System Maps referenced August 20, 2010.

D. Clean Water Act

Project would not affect any waters of the U.S. **(Review Concluded)**

Project would affect waters, including wetlands, of the U.S.

Project exempted as in kind replacement or other exemption. **(Review Concluded)**

Project requires Section 404/401 of Clean Water Act or Section 9/10 of Rivers and Harbors Act permit, including qualification under Nationwide Permits.

Are project conditions required? YES (see Section V) NO **(Review Concluded)**

Project would affect waters of the U.S. by discharging to a surface water body.

Comments: No jurisdictional waters of the U.S., including wetlands, occur in or near the project sites.

Correspondence/Consultation/References: USFWS National Wetlands Inventory map (<http://www.fws.gov/nwi/>) queried on August 20, 2010.

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. **(Review Concluded)**.

State administering agency requires consistency review.

Are project conditions required? YES (see section V) NO (**Review Concluded**)

Comments: This project sites are located within the Louisiana Coastal Management Zone. Projects within the coastal zone may require a coastal use permit or other authorization from LADNR. Projects may be coordinated by contacting LA DNR at 1-225-342-7591.

Correspondence/Consultation/References: Louisiana Coastal Zone maps queried August 20, 2010.

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.
- Are project conditions required? YES (see Section V) NO (**Review Concluded**)

Comments: Project scope does not include impoundment, diversion, control, or other modification of waters of any stream or body of water.

Correspondence/Consultation/References: Louisiana Map (<http://www.lamap.doa.louisiana.gov/>) queried August 20, 2010.

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: The proposed project includes activities that would produce a minor, temporary, and localized impact on air quality from vehicle emissions and fugitive dust particles. No long-term air quality impact is anticipated.

Correspondence/Consultation/References: EPA Region 6 Non-attainment Map

H. Farmland Protection Policy Act

- Project will not affect undisturbed ground. (**Review Concluded**)
- Project has a zoning classification that is other than agricultural or is in an urbanized area. (**Review Concluded**)
- 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 Resources Conservation Service required.
 - Farmland Conversion Impact Rating, Form AD-1006, completed.
- Are project conditions required? YES (see section V) NO (**Review Concluded**)

Comments: The sites are located within an existing urban and developed area and FPPA is precluded.

Correspondence/Consultation/References: Kelly Rowe, Environmental Specialist

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 sites are in existing disturbed areas 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 27, 2005.

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**)
 - NOAA Fisheries provided recommendation(s)
 - 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 August 20, 2010.

K. Wild and Scenic Rivers Act

- Project is not along and does not affect Wild or Scenic River (WSR) - (**Review Concluded**)
- Project is along or affects WSR
 - Project adversely affects WSR as determined by NPS/USFS. **FEMA cannot fund the action.** (NPS/USFS/USFWS/BLM consultation on file) (**Review Concluded**)
 - Project does not adversely affect WSR. (NPS/USFS/USFWS/BLM consultation on file)
Are project conditions required? YES (see Section V) NO (**Review Concluded**)

Comments: Project sites are not along and does not affect Wild or Scenic River (WSR).
Correspondence/Consultation/References: National Wild and Scenic Rivers
<http://www.nps.gov/rivers/wildriverslist.html>

L. 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 (such as asbestos and lead based paint) and/or toxic waste in accordance to the requirements and to the satisfaction of the governing local, state and federal agencies.

M. Other Relevant Laws and Environmental Regulations

Formosan Termite Initiative Act

In accordance with the Formosan Termite Initiative Act, (LA R.S. 3:3391.1 thru 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 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).

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

- 8 Step Process Complete - documentation on file
- Are project conditions required? YES (see Section V) NO (**Review Concluded**)
- A Final Public Notice is required

Comments: The City of New Orleans/Orleans Parish enrolled in the National Flood Insurance Program (NFIP) as of 03/08/1970.

Per preliminary Digital Flood Insurance Rate Map (DFIRM) Panel No. 22071C0115F, dated 11/13/2008; Edward Hynes Elementary School site located in Zone "Shaded X", areas of 0.2% annual chance flood; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1% annual chance flood. Project is demolition of old and construction of new elementary school buildings.

Per preliminary Digital Flood Insurance Rate Map (DFIRM) Panel No. 22071C0230F, dated 11/13/2008; Edward H. Phillips Junior High School and the adjoined Vorice J. Waters Elementary School are located in Zone AE (EL 1) base flood elevation (BFE) determined. Project is demolition of old junior high and elementary school buildings and construction of a new senior high school building complex.

Applicant is required to coordinate with the local floodplain administrator regarding floodplain permit(s) prior to the start of any activities. New construction must be built to the preliminary DFIRM BFE or the local floodplain ordinances; whichever is more stringent and built to current codes and standards. Applicant is responsible for meeting all requirements and permit(s), in compliance with EO 11988. A completed updated 8-Step process showing considered alternatives is attached or on file. Per 44 CFR 9.11(d)(9), the replacement met 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 the base flood elevations. Per 44 CFR 9.12, a cumulative final public notice was published 10/26/2007 and is on file.

B. E.O. 11990 - Wetlands

- No Effects on Wetland(s) and/or 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: None

Correspondence/Consultation/References: U.S. FWS NWI map accessed on-line August 20, 2010

C. E.O. 12898 - Environmental Justice for Low Income and Minority Populations

- Project scope of work has no potential to adversely impact any population (**Review Concluded**)
- No Low income or minority population in, near or affected by the project based on information gathered from <http://factfinder.census.gov>. (**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: OPSB has provided sufficient documentation to demonstrate satisfactory public involvement process throughout the formulation of the "Master Plan", "A Blueprint: Building 21st Century Schools for New Orleans".

Correspondence/Consultation/References:

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).

Comments: None

Correspondence/Consultation/Reference:

IV. Extraordinary Circumstances

Yes

- (i) Greater scope or size than normally experienced for a particular category of action
- (ii) Actions with a high level of public controversy
- (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
- (ix) Potential to violate a federal, state, local or tribal law or requirement imposed for the protection of the environment.
- (x) Potential for significant cumulative impact when the proposed action is combined with other past, present and reasonably foreseeable future actions, even though the impacts of the proposed action may not be significant by themselves.

Comments:

V. Environmental Review Project Conditions

Project Conditions:

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

1. 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 at FEMA, who will in turn contact FEMA Historic Preservation (HP) staff. The applicant will not proceed with work until FEMA HP completes consultation with the 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 Division of Archaeology at 225-342-8170 within seventy-two hours of the discovery. Failure to comply with these stipulations may jeopardize receipt of FEMA funding.
2. 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 (such as asbestos and lead based paint) and/or toxic waste in accordance to the requirements and to the satisfaction of the governing local, state and federal agencies.
3. In accordance with the Formosan Termite Initiative Act, (LA R.S. 3:3391.1 thru 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 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).

4. Per Clean Air Act National Emission Standards for Hazardous Air Pollutant Regulations and Louisiana Administrative Code 33:iii 5151, demolition activities related to possible asbestos-containing materials (PACM) must be inspected for ACM/PACM where it is safe to do so. ACM/PACM must be handled in accordance with local, state and federal regulations and disposed of at approved facilities that accept ACM. Demolition activity notification must be sent to the LDEQ before work begins.
5. This project involves the renovation of a public structure that may contain surfaces coated with lead-based paint (LBP). The applicant is responsible complying with all local, state, and federal laws and ensuring that project activities are coordinated with the Louisiana Department of Environmental Quality for abatement activities.
6. Applicant is required to coordinate with the local floodplain administrator regarding floodplain permit(s) prior to the start of any activities. Applicant is responsible for obtaining and retaining all permits and certificates for verification. 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. In compliance with EO11988, an 8-Step process showing considered alternatives was completed and is attached or on file. Replacement of the building must be elevated to or above the base flood elevation (BFE) per the maps. As Per 44 CFR 9.11 (D) (9), mitigation or minimization standards must be applied where possible. The replacement of building contents, materials and equipment should be, where possible, wet or dry flood-proofed, elevated, or relocated to or above the BFE per the DFIRM Maps.
7. 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.