

# Record of Environmental Consideration

REVISED FOR FEMA ENVIRONMENTAL -- LOUISIANA -- April 2007

See 44 Code of Federal Regulation Part 10

**Project Name/Number:** Recovery School District - Single Settlement Request / PW 19166, Version 2  
FIPS#: 033-UA9M2-00

**Applicant Name:** Recovery School District (RSD)

**Project Locations:** 89 Project Locations (79 Previously Approved Schools & 10 Demolitions)

1	Allen, Henry W., ES - 29.93319, -90.11469 5625 Loyola Street	27	Bienville, Jean Batiste, ES - 30.00967, -90.07792 1456 Gardena Drive
2	Wilson, Andrew H., ES - 29.94630, -90.10218 3617 General Pershing Street	28	McDonogh, John, SHS - 29.97431, -90.07636 2426 Esplanade Avenue
3	Alexander, Avery, ES - 30.01807, -90.05688 5800 St. Roch Avenue	29	Hoffman, John W., ES - 29.94531, -90.09492 2622 S. Prieur Street
4	Jordan, Barbara, ES - 30.01330, -90.01113 4348 Reynes Street	30	Johnson, James W., ES - 29.95638, -90.13016 1800 Monroe Street
5	Behrman, Martin, ES - 29.9482, -90.04866 715 Opelousas Avenue	31	Landry, L.B., HS - 29.94252, -90.04056 1200 L.B. Landry Avenue
6	Woodson, Carter G., MS - 29.93927, -90.09044 2514 Third Street	32	Lafayette, Marquis, ES - 29.95810, -90.11712 2727 S. Carrollton Avenue
7	Carver, George W., SHS - 29.99410, -90.03757 3059 Higgins Blvd.	33	Lake Area MS - 30.01899, -90.07591 6026 Paris Avenue
8	Clark, Joseph S., HS - 29.96963, -90.07055 1301 N. Derbigny St.	34	Hughes, Langston, ES - 29.98787, -90.08099 3519 Trafalgar Street
9	Cohen, Walter L., Sr., HS - 29.93014, -90.09430 3520 Dryades Street	35	Little Woods ES - 30.04703, -89.97870 10200 Curran Blvd.
10	Colton, Charles J., ES - 29.96843, -90.05405 2300 St. Claude Avenue	36	Live Oak (NOCCA) - 29.92319, -90.08497 3128 Constance Street
11	Craig, Joseph A., ES - 29.96508, -90.06903 1423 St. Philip Street	37	Lockett, Johnson C., ES - 29.98236, -90.03741 3240 Law Street
12	Crocker, Lawrence D., ES - 29.93413, -90.09878 2300 General Taylor Street	38	McDonogh 15 ES - 29.96082, -90.06293 721 St. Philip Street
13	Dibert, John, ES - 29.98130, -90.09791 4217 Orleans Avenue	39	McDonogh 28 JHS - 29.97740, -90.07965 2733 Esplanade Avenue
14	Douglass, Frederick A., SHS - 29.96559, -90.03687 3820 St. Claude Avenue	40	McDonogh 32 ES - 29.94354, -90.04816 800 DeArmas Street
15	Drew, Dr. Charles R., ES - 29.96614, -90.03665 3819 St. Claude Avenue	41	McDonogh 42 ES - 29.97822, -90.07093 1651 N. Tonti Street
16	Livingston, Edward, MS - 30.02145, -90.00328 7301 Dwyer Road	42	Osborne, Mildred C., ES - 30.03427, -90.01551 6701 Curran Rd.
17	Edwards, Helen S., ES - 29.99476, -90.03890 Moton, Robert R., ES - 29.98820, -90.03944 3039 Higgins Blvd./3000 Abundance St, New Orleans	43	Parkview Fundamental Magnet - 30.01093, -90.03734 4617 Mirabeau Avenue
18	Eisenhower, Dwight D., ES - 29.90575, -89.99777 3700 Tall Pines Drive	44	Dunbar, Paul L., ES - 29.97063, -90.12379 9330 Forshey St.
19	Morial, Ernest "Dutch", ES - 30.01778, -89.99738 7701 Grant Street	45	Abrams, Ray, ES - 30.02048, -90.01670 6519 Virgilian Street
20	Williams, Fannie C., MS - 30.02983, -89.94944 11755 Dwyer Road	46	Reed, Sarah T., SHS - 30.04153, -89.93174 5316 Michoud Blvd.
21	Frantz, William, ES - 29.97639, -90.03369 3811 N. Galvez Street	47	Rosenwald, Julius, ES - 29.91694, -89.98519 6501 Berkley Drive
22	Gaudet, Frances, ES - 30.05651, -89.96847 12000 Hayne Blvd.	48	Schaumburg, Henry C., ES - 30.01908, -89.97596 9501 Grant Street
23	Gentilly Terrace ES - 30.00767, -90.05271 4720 Painters Street	49	Sherwood Forest ES - 30.02496, -89.95514 4801 Maid Marion Drive
24	Guste, William J., ES - 29.94583, -90.08462 2625 Thalia Street	50	Village de L'est ES - 30.03967, -89.92464 5100 Cannes Street
25	Habans, Paul B., ES - 29.92563, -90.01696 3819 Herschel Street	51	Walker, O. Perry, SHS - 29.94343, -90.02659 2832 General Meyer Avenue
26	Henderson, Murray, ES - 29.93392, -90.04110 1912 L. B. Landry Avenue	52	Williams, Sylvania F., ES - 29.94717, -90.08963 3127 Martin L. King, Jr. Blvd.
		53	Hansberry, Lorraine, ES - 29.97000, -90.04318 1339 Clouet Street

54	Gregory, Francis W., JHS - 30.00326, -90.07108 Buildings A, B & C at 1700 Pratt Drive	72	Harney, Edgar P., ES- 29.94298, -90.09193 2503 Willow Street
55	N.O. HS Signature Center - 29.94958, -90.09721 2600 S. Rocheblave St.	73	Wicker, Albert, ES- 29.96314, -90.07923 2011 Bienville Street
56	Fisk-Howard ES - 29.96765, -90.09337 211 S. Lopez Street	74	Tureaud, A.P., ES- 29.97079, -90.06027 2021 Pauger Street
57	Jordan, Barbara, ES - 30.01330, -90.01113 4348 Reynes Street	75	Jackson, Andrew, ES- 29.93598, -90.07296 1400 Camp Street
58	Terrell, Mary Church, ES - 29.96000, -90.10841 3411 Broadway	76	King, Martin Luther, ES- 29.96652, -90.01364 1617 Caffen Avenue
59	Landry, L.B., HS - 29.94252, -90.04056 1200 L.B. Landry Avenue	77	Lawless, Alfred, HS- 29.97640, -90.01440 5300 Law Street
60	Livingston, Edward, MS - 30.02145, -90.00328 Building Addition at 7301 Dwyer Road	78	Tubman, Harriet R., HS- 29.94445, -90.03627 2013 General Meyer Avenue
61	Washington, Booker T., HS- 1201 S. Roman Street	79	Edison, Thomas Alva, ES- 29.95948, -90.082161 1339 Forstall Street
62	Augustine, Israel, MS- 29.96248, -90.09062 425 S. Broad Street	80	Colton, Charles J., ES- 29.96843, -90.05405 2300 St. Claude Avenue
63	Jones, Valena, ES- 29.97879, -90.06329 1901 N. Galvez Street	81	Banneker, Benjamin, ES- 29.939721, -90.132672 421 Burdette Street
64	Haley, Oretha, ES- 29.97334, -90.04934 2515 N. Robertson Street	82	Bauduit, Agnes L., ES- 29.920049, -90.092428 3649 Laurel Street
65	Mondy, George O., ES- 29.97066, -90.07698 2327 St. Philip Street	83	Crossman, A.D., ES- 29.972016, -90.104517 4407 S. Carrollton Avenue
66	Armstrong, Louis, ES- 29.96072, -90.01241 5909 St. Claude Avenue	84	Fischer, William J., ES- 29.934866, -90.042825 1801 L.B. Landry
67	Jeff, Morris, ES- 29.97484, -90.08720 800 N. Rendon Street	85	King, M.L., School for Science & Tech. - 29.96652, -90.01364 1617 Caffen Avenue
68	Bell, Andrew J., MS- 29.96943, -90.07522 1010 N. Galvez Street	86	Laurel, ES- 29.927214, -90.075636 820 Jackson Avenue
69	Kennedy, John F., HS- 30.01572, -90.08661 5700 Wisner Boulevard	87	Marshall, Thurgood, MS- 29.979067, -90.106043 4621 Canal Street
70	Lafon, Thomy, ES- 29.93821, -90.09389 2601 Seventh Street	88	McNair, Ronald, ES- 29.950124, -90.126167 1607 South Carrollton Avenue
71	Wheatley, Phillis, ES- 29.96923, -90.07824 2300 Dumaine Street	89	Rabouin, L.E., HS- 29.947017, -90.072836 727 Carondelet Street

**Project Description:**

On August 29, 2005, Hurricane Katrina and its aftermath caused wind and flood damages to numerous public schools throughout Orleans Parish in Louisiana. This Record of Environmental Consideration (REC) addresses Version 2 of the Recovery School District's "Single Settlement Request" (SSR) for FEMA grant funding to help support the restoration of school services in Orleans Parish following Hurricane Katrina by means of both new construction and repair of damaged facilities. Version 0 of the SSR was written to capture the RSD Alternate Project #982 pursuant to Section 522 of the Consolidated Appropriations Act, 2008. The Alternate Project utilizes FEMA funding from numerous facilities damaged by the storm for the repair and reconstruction of the New Orleans Public School Educational System, scaled to the post-Katrina New Orleans demographics in compliance with relevant codes and prevailing educational standards. In Version 0 of PW 19166, the applicant proposed to use funding from contributing facilities for the construction, repair, or demolition of sites #1 thru #60 listed in the table above. Site Sheets correlating to the list above have been prepared by Public Assistance that summarize the proposed scopes of work (attached to Version 1 of PW 19166). These scopes of work are presented below for those sites covered within this PW.

Version 1 of the SSR was written to document changes in the approved scopes of work as a function of FEMA approval letters and acknowledges the revised RSD Master Plan.

This REC for Version 2 documents reviews for Environmental and Historic Preservation "Holdouts" listed in the RECs for Version 0 and Version 1 and approves specific school campus sites that may be built to the Advisory Base Flood Elevations.

### **EHP Holdouts (9)**

The following nine schools sites were designated as "EHP Holdouts" in Version 1 of PW 19166.

#### **Site 61 - Booker T. Washington**

The RSD intends to renovate 20,000 square feet and construct a new 213,000 square foot addition at the Booker T. Washington High School site, located at 1201 South Roman Street. This REC covers proposed demolition and construction activities, associated A/E fees, and recordation and other National Historic Preservation Act (NHPA) conditions as specified in the Memorandum of Agreement (MOA) for the proposed project site. Proposed recordation measures include a Historic American Building Survey (HABS) for large format photography, a historic narrative, and production of archival drawings and photographs in accordance with the MOA, dated July 20, 2011. Demolition and site restoration measures are proposed for the following buildings: main classroom building (excluding recoupment features described in the MOA Appendix B), annex/gymnasium building, aquaculture building, greenhouse, agricultural building, and mechanical equipment building. Proposed rehabilitation and recoupment measures include selective demolition and rehabilitation of the auditorium building and cleaning and storing of select exterior brick sections of the main classroom building, allowing for restoration of certain architectural features. New construction measures include a new three (3) story facility that will feature classrooms, a library/media center, a performing and visual arts facility, a fitness center, a gymnasium, an auxiliary gymnasium, a cafeteria, a health clinic, and office space for administrative/student support services. Additional mitigation measures, as specified in the MOA, include the development and submission of updates to the National Register of Historic Places.

#### **Site 62 - Israel Augustine Middle School**

The RSD proposes stabilization and mothballing procedures for Buildings A and B of the Augustine Middle School campus, located at 425 S. Broad Street. Proposed measures for Building A include: debris removal and broom cleaning of the facility, installation of a Vandal Protection System (VPS), repair/replacement of temporary perimeter fencing, installation of temporary gutters and downspouts, detailing and securing of historic materials, hazardous material testing for contaminants (e.g. asbestos, lead, biohazards), and repair or replacement of the roof. Proposed measures for Building B consist of the installation of a VPS.

#### **Site 63 - Valena Jones Elementary School**

The RSD proposes stabilization and mothballing procedures for Building A of the Valena Jones Elementary School campus, located at 1901 N. Galvez Street. Proposed measures include: debris removal and broom cleaning of the facility, installation of a Vandal Protection System (VPS), repair of existing fencing and installation of new perimeter fencing, pest control measures, installation of temporary gutters and downspouts, detailing and securing of historic materials, and hazardous material testing and removal of contaminants (e.g. asbestos, lead, biohazards).

#### **Site 64 - Oretha Haley Elementary School**

The RSD proposes stabilization and mothballing procedures for the main building of the Oretha Haley Elementary School campus, located at 2515 N. Robertson Street. The proposed scope of work includes: debris removal and broom cleaning of the facility, installation of a VPS that will provide passive ventilation and fire and security monitoring, repair of existing fencing, installation of new temporary perimeter fencing, pest control measures, detailing and securing of historic materials, hazardous material testing and removal of contaminants (e.g. asbestos, lead, biohazards) as necessary, and demolition of the 19,730 square foot cafeteria building.

#### **Site 66 - Louis Armstrong Elementary School Building A**

The RSD proposes stabilization and mothballing procedures for building A of the Louis D. Armstrong Elementary School campus, located at 5909 St. Claude Avenue. The proposed scope of work includes: debris removal and broom cleaning of the facility, installation of a VPS that will provide passive ventilation and fire and security monitoring, repair of existing fencing, installation of temporary perimeter fencing, pest control measures, detailing and securing of historic materials, testing for hazardous materials, and the subsequent removal of contaminants (e.g. asbestos, lead, biohazards) as necessary. Hazardous materials would be stabilized or removed from the facility and the utilities would also be disconnected.

#### **Site 67 - Morris Jeff Elementary School**

The RSD proposes stabilization and mothballing procedures for the main building and cafeteria annex of the Morris Jeff Elementary School campus, located at 800 N. Rendon Street. The proposed scope of work includes: debris removal and broom cleaning of the facility, installation of a VPS that will provide passive ventilation and fire and security monitoring, repair of existing fencing, installation of new temporary perimeter fencing, pest control measures, detailing and securing of historic materials, and hazardous material testing and removal of contaminants (e.g. asbestos, lead, biohazards) as necessary. Hazardous materials would be stabilized or removed from the facility and the utilities would

also be disconnected. Monitoring activities would continue for the duration of the mothballing period.

**Site 70 - Thomy Lafon Elementary School**

The RSD intends to demolish the buildings of the Thomy Lafon Elementary School, 2601 Seventh Street. The demolition includes Building C, Building 1, the Library, and the Main Building B.

**Site 71 - Phillis Wheatley Elementary School Building B**

This REC reviews the RSD's intentions to demolish the existing buildings, drives, and parking area associated with the Phillis Wheatley Elementary School in order to construct a new school which will accommodate approximately 600 students. The new school would be a 95,000 square foot, three (3) story facility elevated to the applicable base flood elevation, complete with: classrooms, science labs, a library/media center, computer labs, arts/music facilities with flexible performance space, a commercial kitchen and cafeteria, a gymnasium, a stage, and office space for administrative/student support services.

**Approval to Utilize Advisory Base Flood Elevation Maps as Best Available Data**

The applicant is approved to build the following specific facilities to the Advisory Base Flood Elevations and/or Highest Existing Adjacent Grade (HEAG).

1. New School (former site of Mildred C. Osborne Elementary School) at 6701 Curran Road, New Orleans LA is approved per FEMA Mitigation Division Director, Region 6 dated July 20, 2011.
2. New School (former site of Ray Abrams Elementary School) at 6519 Virgilian Street, New Orleans LA is approved per FEMA Mitigation Division Director, Region 6 dated July 20, 2011.
3. New School (former site of Sherwood Forest Elementary School) at 4801 Maid Marion Drive, New Orleans LA is approved per FEMA Mitigation Division Director, Region 6 dated July 20, 2011.
4. New School (former site of Fannie C. Williams Middle School) at 11755 Dwyer Road, New Orleans LA is approved per FEMA Mitigation Division Director, Region 6 dated July 20, 2011.
5. New School (former site of George W. Carver Senior High School) at 3059 Higgins Blvd, New Orleans LA is approved per FEMA Mitigation Division Director, Region 6 dated July 20, 2011.
6. New School (former site of Jean Batiste de Bienville Elementary School) at 1456 Gardena Drive, New Orleans LA is approved per FEMA Mitigation Division Director, Region 6 dated July 20, 2011.
7. New School (former site of Lockett Elementary School) at 3420 Law Street, New Orleans LA is approved per FEMA Mitigation Division Director, Region 6 dated July 20, 2011.
8. New School (former site of Ernest "Dutch" Morial Elementary School) at 7701 Grant Street, New Orleans LA is approved per FEMA Mitigation Division Director, Region 6 dated July 20, 2011.
9. New School (former site of Avery Alexander Elementary School) at 5800 St. Roch Avenue, New Orleans LA is approved per FEMA Mitigation Division Director, Region 6 dated July 20, 2011.
10. New School (former site of Vorice J. Waters Elementary School) at 3800 Cadillac Street, New Orleans LA is approved per FEMA Mitigation Division Director, Region 6 dated September 27, 2011.
11. New School (former site of Edward Livingston Middle School) at 7301 Dwyer Road, New Orleans LA is approved per FEMA Mitigation Division Director, Region 6 dated September 27, 2011.
12. New School (former site of Parkview Fundamental Magnet School) at 4617 Mirabeau Avenue, New Orleans LA is approved per FEMA Mitigation Division Director, Region 6 dated September 27, 2011.

Prior to the issuance of the FEMA Louisiana Flood Recovery Guidance issued February 11, 2008, the replacement structures were eligible for reconstruction at the ABFE, if available, or three feet above the HEAG, whichever is higher.

As a result of the Digital Flood Insurance Rate Map (DFIRM), issued November 13, 2008, for Orleans Parish, the elevation requirements for the proposed sites are higher than the ABFE/HEAG. The FEMA Louisiana Flood Recovery Guidance issued February 2008 states that "If PWs for repair or replacement of eligible facilities have had funds obligated; revisions to incorporate the new elevations are not required.

The Applicant is also approved to build the following specific facilities to the ABFE:

1. New School located at 5100 Cannes Street, New Orleans, LA (Proposed Lat/Long 30.0400, -89.9241). Approved per FEMA Mitigation Division Director, Region 6 dated January 4, 2012.
2. Behrman, Martin Elementary School located at Opelousas Ave between Thayer and Atlantic, New Orleans, LA (Proposed Lat/Long 29.94896, -90.04351). Approved per FEMA Mitigation Division Director, Region 6 dated April 11, 2012.
3. Bradley, Stuart R. Elementary School located at 2401 Humanity Street, New Orleans, LA (Proposed Lat/Long 29.99228, -90.05436). Approved per FEMA Mitigation Division Director, Region 6 dated April 11, 2012.
4. Fischer, William J. Elementary School located at 1801 L.B. Landry Avenue, New Orleans, LA (Proposed Lat/Long 29.93493, -90.04188). Approved per FEMA Mitigation Division Director, Region 6 dated April 11, 2012.
5. Fisk-Howard Elementary School located at 211 S. Lopez Street, New Orleans, LA (Proposed Lat/Long 29.96765, -90.09337). Approved per FEMA Mitigation Division Director, Region 6 dated April 11, 2012.
6. Habans, Paul B. Elementary School located at 3819 Herschel Street, New Orleans, LA (Proposed Lat/Long 29.92563, -90.01696). Approved per FEMA Mitigation Division Director, Region 6 dated April 11, 2012.
7. New Algiers Elementary School located at Seine Street and Texas Drive, New Orleans, LA (Proposed Lat/Long 29.92153, -90.02065). Approved per FEMA Mitigation Division Director, Region 6 dated April 11, 2012.
8. New Orleans East High School located at 5552 Read Boulevard, New Orleans, LA (Proposed Lat/Long 30.026702, -89.974332). Approved per FEMA Mitigation Division Director, Region 6 dated July 2, 2012.
9. Per New Orleans School Facilities Master Plan located at 5300 Law Street, New Orleans, LA (Proposed Lat/Long 29.976547, --90.014949). Approved per FEMA Mitigation Division Director, Region 6 dated May 16, 2012.
10. Per New Orleans School Facilities Master Plan located at 2300 St. Claude Avenue, New Orleans, LA (Proposed Lat/Long 29.968284, --90.053728). Approved per FEMA Mitigation Division Director, Region 6 dated May 16, 2012.
11. Per New Orleans School Facilities Master Plan located at 1201 South Roman Street, New Orleans, LA (Proposed Lat/Long 29.949939, --90.089132). Approved per FEMA Mitigation Division Director, Region 6 dated May 16, 2012.
12. Per New Orleans School Facilities Master Plan located at 12000 Hayne Boulevard, New Orleans, LA (Proposed Lat/Long 30.057197, --89.967501). Approved per FEMA Mitigation Division Director, Region 6 dated May 16, 2012.

In accordance with the Best Available Data Guidance Memorandum issued on October 13, 2011, for areas of Greater New Orleans located within the recently constructed Hurricane and Storm Damage Risk Reduction System (HSDRRS) and based on the source adopted by New Orleans, reconstruction to 2008 DFIRM elevation is not required. However, the Applicant must coordinate all reconstruction activities with the local floodplain manager and remain in compliance with formally adopted local floodplain ordinances.

### **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 the applicant has provided sufficient documentation to demonstrate a satisfactory public involvement process for rebuilding schools in Orleans Parish within Louisiana. Any changes to the scope of work will require re-submission through the state to FEMA and requires re-evaluation for compliance with the National Environmental Policy Act (NEPA). 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.

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

### **Reviewer and Approvals**

#### **FEMA Environmental Reviewer:**

Name: John Renne, Environmental Specialist, FEMA LRO

Signature John Renne Date 8/23/2012

#### **FEMA Environmental Liaison Officer or Delegated Approving Official:**

Name: LeSchina Holmes, Lead Environmental Protection Specialist, FEMA LRO

Signature LeSchina Holmes Date 08.23.2012

## **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:** Section 106 of the National Historic Preservation Act (NHPA) requires Federal agencies to take into account the effects of their undertakings on historic properties and afford the Advisory Council on Historic Preservation a reasonable opportunity to comment on such undertakings. Section 106 requires Federal agencies to identify historic properties that may be affected by the proposed action. Historic properties are districts, sites, buildings, structures, and objects significant in American history, architecture, archeology, engineering and culture that are listed in or determined eligible for listing in the National Register of Historic Places. If adverse effects on historic, archaeological or cultural properties are identified, agencies must consider alternatives that may avoid or minimize the adverse effect. If no such alternatives are determined to be feasible the Federal agency must identify measures that will mitigate the adverse effect to historic properties.

The Section 106 review of the proposed demolition, construction, repair, or rehabilitation for sites in Version 2 of this Project Worksheet (Undertaking) 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 the Section 106 review for the Version 2 Undertakings, including the contributing projects: “brick and mortar”, “non-brick and mortar”, “non-educational” replacement buildings, and “repair-open” buildings from which the funding for the construction of the recipient schools will be drawn. The scope of work for the contributing projects for this PW are referred to as “donor scope” and fall into one of four (4) categories: continued use, demolish, safe and secure, or mothball. The donor scope for each of these projects is noted in Attachment 6. Any change to the scope of work is reflected in the site sheets. Any change to the approved scope of work will require reevaluation under Section 106. Failure to comply with these stipulations may jeopardize receipt of FEMA funding.

In accordance with the RSD/OPSB 2PA, FEMA has determined that there is No Adverse Effect to historic properties with conditions as a result of the donor scopes of work in Version 2 for sites 62-64 and 66-68. The SHPO/Tribal consultation for these undertakings is attached to PW 19166. The conditions for sites 62-64 and 66-68 are written in the conditions section of PW 19166 Version 2 and the associated REC.

Site 68 is also subject to an SMMA. This SMMA is still applicable and is attached to PW 19166 Version 2.

For donor sites 61, 70, and 71, FEMA has developed Memoranda of Agreement (MOAs) among Federal Emergency Management Agency, Advisory Council on Historic Preservation, Louisiana State Historic Preservation Officer, and

Department of Education through its Recovery School District. To remain in compliance with Section 106, the applicant must complete the stipulations identified in the attached MOAs and summarized in the conditions section of the REC and PW 19166 Version 2. The review comments and MOAs are attached to PW 19166 Version 2.

For sites 7 (Carver), 54 (Gregory), and 56 (Fisk-Howard), Version 2 is for a cost adjustment only; the Historic determination in Version 0 dated 8-22-2010 remains valid. This action will not affect the previous historic clearance. No further Historic review is required unless there is a change to the scope of work. All previous comments and conditions are still applicable.

For sites 50 (Village de L'est) and 64 (Haley), Version 2 is for a cost adjustment only; the historic determination in Version 1 dated 5-11-2012 remains valid. This action will not affect the previous historic clearance. No further Historic review is required unless there is a change to the scope of work. All previous comments and conditions are still applicable.

**Correspondence/Consultation/References:** Victoria Byrd, Historic Preservation Special

## 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:** John Renne, Environmental Specialist

## 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 May 15, 2012.

## 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:** John Renne, Environmental Specialist

### 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 is located within the Louisiana Coastal Management Zone. See conditions.  
**Correspondence/Consultation/References:** Louisiana Coastal Zone maps queried May 14, 2012.

### 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 May 14, 2012.

### 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. See Conditions.  
**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:** John Renne, 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 May 14, 2012.

## 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 do 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).

### Toxic Substances Control Act

This project involves the demolition, renovation, refurbishing of a public child-occupied structure and/or facility constructed prior to 1978 that may contain surfaces coated with lead-based paint (LBP).

## 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 and attached within Version 1  
Are project conditions required?  YES (see Section V)  NO **(Review Concluded)**
    - A Final Public Notice is required

**Comments:** Version 2 is a revision of a previously approved series of alternate or improved projects for ABFE flood elevations, addition of EHP Holdouts, and other cost revisions to the Master Plan for this single settlement request PW. By memoranda with various dates between July 2011 and May 16, 2012 (attached to this REC), Frank Pagano, Mitigation Division Director of FEMA Region 6 to John Connolly, Senior Public Assistance Advisor, Louisiana Recovery Office, FEMA Region VI determined that the 2008 Preliminary Digital Flood Insurance Rate Map (DFIRM) Elevation is not required; however, the applicant must coordinate all reconstruction activities with the local floodplain manager and remain in compliance with formally adopted local floodplain ordinances. 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-proofed, elevated, or relocated to or above the community established base flood elevation. Critical action facilities, as defined under 44 CFR 9.4, need to be wet or dry-proofed, elevated, or relocated to or above the 0.2% annual chance (500-year) flood elevation.

**Correspondence/Consultation/References:** John Renne, CFM, Floodplain Specialist

### **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 May 14, 2012

### **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:** RSD has provided sufficient documentation to demonstrate satisfactory public involvement process throughout the formulation of the "Master Plan", "A Blueprint: Building 21<sup>st</sup> 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. 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.
2. Following Hurricane Katrina, in accordance with the Formosan Termite Initiative Act (LA R.S. 3:3391.1 thru 3391.13), the Louisiana Parish of Orleans was placed under quarantine. This quarantine was rescinded April 1, 2011. If applicable, the movement of wood or cellulose material, temporary housing or architectural components (e.g. beams, doors and other wood salvaged from a structure) must have not left the quarantined parishes without written authorization from the Commissioner of the Louisiana Department of Agriculture and forestry or his designee(s).

3. 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.
4. 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.
5. The applicant is required to coordinate with the local floodplain administrator regarding floodplain permit(s) prior to the start of any activities. The 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.
6. 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.
7. If required by LDEQ, the applicant shall require its contractor to prepare, certify, and implement a construction storm water pollution prevention plan (SWPPP) to prevent sediment and construction material transport from the project site. A Louisiana Pollution Discharge Elimination System (LAPDES) permit will be required in accordance with the Clean Water Act and the Louisiana Clean Water Code. All coordination pertaining to these activities should be documented and copies forwarded to the State and FEMA as part of the permanent project files.
8. If during the course of work, archaeological artifacts (prehistoric or historic) 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 application will not proceed with work until FEMA HP completes consultation with the SHPO.
9. If human bone or unmarked grave(s) are present with the project area, 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 (24) hours of the discovery. The applicant shall also notify FEMA and the Louisiana Division of Archaeology at 225-342-8170** within seventy-two (72) hours of the discovery.
10. RSD must notify FEMA, through the alternate project amendment process established by FEMA PA and GOHSEP, of any change to the approved SOW. Any change to the approved SOW will require reevaluation under the Section 106 process.
11. Any change to the approved scope of work will require resubmission for re-evaluation for compliance with the National Environmental Policy Act. Non-compliance with this requirement may jeopardize the receipt of federal funding.

## Historic Preservation Conditions by site:

### Site 61, Booker T. Washington High School

12. To remain in compliance with Section 106 of the NHPA and the MOA dated August 25, 2011, RSD must complete stipulations II. A (recordation); II.B (recoupment and restoration efforts); II.C (update National Register Nomination); II.D (develop and implement an Interpretive Plan); III (discoveries and unforeseen effects); VIII (duration and reporting) identified in the attached MOA.

### Site 62, Israel Augustine Middle School

13. To remain in compliance with Section 106 of the NHPA and the RSD/OPSB 2PA, RSD must complete the conditions summarized below. The conditions detailed in the attached FEMA consultation letters dated March 30, 2011 and April 21, 2011; and SHPO response dated May 10, 2011.
  - 1) Record the building's character defining features (interior and exterior) with digital photographs.
  - 2) Provide Security and Maintenance Schedule; Conditions Survey; and Monitoring Report.
  - 3) Submit roofing plans that incorporate FEMA's comments (1/6/11 and 3/10/11) for Building A.
  - 4) Notify FEMA if the property is to be transferred to OPSB.
  - 5) Perform all work in accordance with the National Park Service's Preservation Brief 31 and RSD's Clarifying comments regarding mothballing.
  - 6) FEMA's SOI qualified staff will determine if the scope of work has substantially arrested the deterioration of the building and review any changes to the proposed use of the building. If the change in proposed use and/or condition of the building has the potential to cause adverse effects to historic properties, FEMA will consult with SHPO at that time.
  - 7) Upon transfer of the property to OPSB, FEMA will re-initiate SHPO consultation.

### Site 63, Valena Jones Elementary School

14. To remain in compliance with Section 106 of the NHPA and the RSD/OPSB 2PA, RSD must complete the conditions summarized below. These conditions are detailed in the attached FEMA consultation letters dated April 11, 2011 and April 21, 2011; and SHPO response dated May 5, 2011.
  - 1) Record the building's character defining features (interior and exterior) with digital photographs.
  - 2) Provide Security and Maintenance Schedule; Conditions Survey; and Monitoring Report.
  - 3) Notify FEMA if the property is to be transferred to OPSB.
  - 4) Perform all work in accordance with the National Park Service's Preservation Brief 31 and RSD's clarifying comments regarding mothballing.
  - 5) FEMA's SOI qualified staff will determine if the scope of work has substantially arrested the deterioration of the building and review any changes to the proposed use of the building. If the change in proposed use and/or condition of the building has the potential to cause adverse effects to historic properties, FEMA will consult with SHPO at that time.
  - 6) Upon transfer of the property to OPSB, FEMA will re-initiate SHPO consultation.

### Site 64, Oretha Haley Elementary School

15. To remain in compliance with Section 106 of the NHPA and the RSD/OPSB 2PA, RSD must complete the conditions summarized below. These conditions are detailed in the attached FEMA consultation letters dated July 14, 2008, March 30, 2011, and April 21, 2011; and SHPO responses dated July 24, 2008, and May 13, 2011.
  - 1) Record the building's character defining features (interior and exterior) with digital photographs.
  - 2) Provide Security and Maintenance Schedule; Conditions Survey; and Monitoring Report.
  - 3) Notify FEMA if the property is to be transferred to OPSB.
  - 4) Perform all work in accordance with the National Park Service's Preservation Brief 31 and RSD's clarifying comments regarding mothballing.

- 5) FEMA's SOI qualified staff will determine if the scope of work has substantially arrested the deterioration of the building and review any changes to the proposed use of the building. If the change in proposed use and/or condition of the building has the potential to cause adverse effects to historic properties, FEMA will consult with SHPO at that time.
- 6) Upon transfer of the property to OPSB, FEMA will re-initiate SHPO consultation.

**Site 66, Louis Armstrong Elementary School**

16. To remain in compliance with Section 106 of the NHPA and the RSD/OPSB 2PA, RSD must complete the conditions summarized below. These conditions are also detailed in the attached FEMA consultation letter dated May 23, 2011 and SHPO response dated June 13, 2011.
  - 1) Record the building with digital photographs.
  - 2) Provide Security and Maintenance Schedule; Conditions Survey; and Monitoring Report.
  - 3) Submit Conditions Survey (interior and exterior) for review within 3 months after project obligation
  - 4) Notify FEMA if the property is to be transferred to OPSB.
  - 5) Perform all work in accordance with the National Park Service's Preservation Brief 31 and RSD's clarifying comments regarding mothballing.
  - 6) FEMA's SOI qualified staff will determine if the scope of work has substantially arrested the deterioration of the building and review any changes to the proposed use of the building. If the change in proposed use and/or condition of the building has the potential to cause adverse effects to historic properties, FEMA will consult with SHPO at that time.
  - 7) Upon transfer of the property to OPSB, FEMA will re-initiate SHPO consultation.

**Site 67, Morris Jeff Elementary School**

17. To remain in compliance with Section 106 of the NHPA and the RSD/OPSB 2PA, RSD must complete the conditions summarized below. These conditions are also detailed in the attached FEMA consultation letters dated March 31, 2011 and April 21, 2011; and SHPO response dated May 5, 2011.
  - 1) Record the building's character defining features with digital photographs.
  - 2) Provide Security and Maintenance Schedule; Conditions Survey; and Monitoring Report.
  - 3) Notify FEMA if the property is to be transferred to OPSB.
  - 4) Perform all work in accordance with the National Park Service's Preservation Brief 31 and RSD's clarifying comments regarding mothballing.
  - 5) FEMA's SOI qualified staff will determine if the scope of work has substantially arrested the deterioration of the building and review any changes to the proposed use of the building. If the change in proposed use and/or condition of the building has the potential to cause adverse effects to historic properties, FEMA will consult with SHPO at that time.
  - 6) Upon transfer of the property to OPSB, FEMA will re-initiate SHPO consultation.

**Site 68, Andrew J. Bell Middle School**

18. To remain in compliance with Section 106 of the NHPA and the RSD/OPSB 2PA, RSD must complete the conditions and standard mitigation measures summarized below.

The conditions for Buildings A, B, and the Administration Building are detailed in the attached FEMA consultation letter dated August 24, 2011.

- 1) Record buildings with digital photographs.
- 2) Provide Security and Maintenance Schedule; Conditions Survey; and Monitoring Report.
- 3) Notify FEMA when the property is to be transferred to OPSB and update this notice following the actual transfer.
- 4) Perform all work in accordance with the National Park Service's Preservation Brief 31 and RSD's clarifying comments regarding mothballing.
- 5) Remove and securely store remaining copper cornice elements.
- 6) Submit any changes to the roof of Building A to FEMA for review and comment.

The conditions for Building F are detailed in the attached FEMA consultation letters dated September 29, 2009 and October 4, 2010; and SHPO responses dated October 5, 2009 and October 22, 2010:

- 1) Reduce the effects of staging equipment or stockpiling of debris in the green space in the vicinity of Building F and the Benjamin Franklin School provided the presence of an archaeological monitor. In the absence of an archaeological monitor in this area, no staging will occur.
- 2) Archaeological monitor(s) will be present during all demolition activities and specified ground disturbing activities.
- 3) Should the land banking evolve into a FEMA-funded project wherein new construction is proposed for the current project area, Section 106 requires that the review process be revisited to take into consideration the effects new construction would have on historic properties.
- 4) Ground disturbance should be limited to the minimum amount necessary to carry out the undertaking.
- 5) If any intact cultural remains are encountered, the discovery area will be hand excavated, sample screened, profiled and photographed.
- 6) Follow reporting and curation standards in accordance with attached letter.

The conditions and mitigation measures for Building E (Custodial Lodge) summarized below are detailed in the attached SMMA dated September 21, 2011; and SHPO response dated October 19, 2011.

- 1) To minimize possible effects to unexamined portions of archaeological site 16OR560, RSD will ensure that an archaeological monitor is present at all times for the specified ground disturbing activities. Qualifications and duties are outlined in the attached consultation letter.
- 2) RSD shall require that ground disturbance be limited to the minimum amount necessary to carry out the undertaking. RSD's construction contractor shall avoid, as much as is practicable, staging equipment or stockpiling of debris in the green space in the vicinity of Building F and Building B. In the absence of an archaeological monitor in this area, no staging will occur.
- 3) Prepare an archaeological report and submit in accordance with attached letter.
- 4) RSD shall ensure that all collected artifacts, notes, and photos from the archaeological monitoring are prepared for curation and curate them in compliance with referenced guidelines.

**Recordation:**

- 1) RSD will digitally photograph the Custodial Lodge.
- 2) RSD will provide FEMA with two (2) copies of the photographic recordation prior to printing the recordation materials on archival paper for review by FEMA and SHPO.
- 3) RSD will prepare three (3) archival copies of the photographs and will deliver the recordation materials to FEMA for distribution.

**Site 70, Thomy Lafon Elementary School**

19. To remain in compliance with Section 106 of the NHPA and the MOA dated February 21, 2010 RSD must complete the stipulations III (recordation); Stipulation IV (demolition approach), V (archaeological monitoring: qualification roles and responsibilities); VI (coordination with Louisiana Unmarked Human Burial Site Act); VII (discoveries and unforeseen effects: archaeological identification, evaluation, and consultation); VIII (archaeological monitoring reporting and consultation); IX (curation); X (treatment of the site) and XV (duration) in the attached MOA.

**Site 71, Phillis Wheatley Elementary School**

20. To remain in compliance with Section 106 of the NHPA and the MOA dated February 18, 2011 RSD must complete the stipulations III (recordation); IV (educational materials); VI (discoveries and unforeseen effects); and XI (duration and reporting) identified in the attached MOA.