

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, Revision 1
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 1 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. Specifically, this REC covers proposed scope changes for sites covered in the REC for Version 0, proposed scope changes to donor facilities listed in Attachment 6 of Version 0, and certain architectural and engineering (A&E) fees incurred during the formulation of the applicant’s revised Master Plan, as detailed in Project Worksheet (PW) 19166.

The applicant’s original Master Plan, dated November 6, 2008, proposed six (6) phases of construction activities spanning a period of several years. Formulated after considering demographic changes in the area and community feedback, the revised Master Plan adds facilities not previously identified, changes the scope for several sites, and reflects only two (2) phases by moving forward several schools designated for Phases 3-6 in the original Master Plan. Essentially, the revised Master Plan proposes the demolition, repair, or construction of facilities at several school sites located throughout Orleans Parish. All proposed new construction or major renovations would be designed with a LEED Silver certification goal. LEED (Leadership in Energy and Environmental Design) certification provides independent verification that a structure was designed in a manner to ensure high performance in certain areas of human and environmental health (e.g. water savings, energy efficiency, etc.).

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. Since the obligation of Version 0, the applicant has

requested multiple amendments to the original scope reviewed by FEMA EHP. Listed below are proposed scope changes to sites originally reviewed in the REC for Version 0:

Site 8 - Joseph S. Clark Senior High School

The RSD intends a number of renovations at the Joseph S. Clark Senior High School, located at 1301 N. Derbigny Street. This REC addresses the RSD's intention to complete certain repairs to the main building and the gymnasium/cafeteria building. Proposed repairs to the main building include: elimination of "bubbles" in the roofing membrane, repair of the roof's loose ends, repair of the roof substrate, creation of a cricket (a ridged structure designed to divert water on a roof), and possible structural repairs to roof timbers. Proposed repairs to the gymnasium/cafeteria building include: removal of debris from the roof and gutters, repair of the upper gutters, reworking of damaged downspouts, installation of a splash block, repair of loose vent stacks, and installation of protective cages around rooftop equipment.

Site 9 - Walter L. Cohen Senior High School

The RSD intends to renovate the air-handling system at the Walter L. Cohen Senior High School, located at 3520 Dryades Street. This REC reviews the applicant's proposal to design a correction for the current HVAC return air/ventilation problems, replace two (2) chilled water pumps and electrical panels each in the penthouse, and replace the existing HVAC Building Automation System.

Site 11 - Joseph A. Craig Elementary School

The RSD intends to complete a number of renovations at the Joseph A. Craig Elementary School, located at 1423 St. Philip Street. This REC addresses the applicant's proposal to install a Building Automation System (BAS). The BAS is a monitoring system that would integrate the facility's control systems and provide a common graphical user interface, providing both central and remote access to the school's control systems. The proposed BAS would be installed so as not to affect the historic character of the facility.

Site 13 - John Dibert Elementary School

The RSD intends to complete renovations at the John Dibert Elementary School, located at 4217 Orleans Avenue. This REC covers the following proposed repairs to the main building: removal and replacement of the roof-three vents, edge flashing, and one (1) skylight; repair of a small area of the roof that "bubbles," including insulation; repair of window on the second floor that leaks; and repairs to the interior finishes as needed. Non-permanent work covered by this REC includes: lift and/or crane rental, chute rental for demolition debris disposal, dumpster rental and disposal fees, and site clean up.

Site 18 - Dwight D. Eisenhower Elementary School

The RSD intends to rehabilitate the Dwight D. Eisenhower Elementary School, located at 3700 Tall Pines Drive. This REC covers certain repairs to the main building, the cafeteria/library building, and one (1) modular building located on campus. Proposed repairs to the main building include removal and replacement of the roof and repair or replacement of window flashing as needed. Proposed repairs for the cafeteria/library building include: replacement of the roof-mounted exhaust fans, cleaning of the roof drain lines, removal of debris from the roof, and repair of bubbles in the roof on the west side of the building and the area above the lobby. Proposed repairs for the modular building include the removal and replacement of the modified bitumen roofing system and associated elements.

Site 19 - Ernest "Dutch" Morial Elementary School

The RSD plans to construct a new, state-of-the art pre-kindergarten through eighth grade (pre-k through 8) elementary school at the pre-disaster Abrams School site, located at 6519 Virgilian Street. This REC only reviews the RSD's intentions to remove the existing fence, install new perimeter fencing, and the install double-swing gates to secure property access.

Site 22 - Frances Gaudet Elementary School

The RSD intends to rehabilitate the Frances Gaudet Elementary School, located at 1200 Hayne Boulevard. This REC reviews proposed repairs to Buildings A, B, C, and D. Proposed repairs for Building A include: removal and replacement of perimeter roof flashing, installation of rooftop gas and drain lines (including new supporting blocks), and removal and replacement of damaged vent cap. Proposed repairs for Building B include replacement of the galvanized metal roof with a spray-applied roof (including relocation and replacement of damaged gutters and downspouts to match existing materials), and other repairs to the roof and interior finishes as needed. Proposed repairs for Building C consist of replacement of the metal pane roof with a new spray-applied roof (including relocation and replacement of some of the downspouts, gutters, and flashing). Proposed measures for Building D consist of minor roof and masonry parapet repairs.

Site 25 - Paul B. Habans Elementary School

The RSD intends to build a new, state-of-the art 95,000 square foot pre-kindergarten through eighth grade (pre-k through 8) elementary school at the pre-disaster Paul B. Habans Elementary School site, located at 3819 Herschel Street. This REC addresses proposed repairs to the original main building and cafeteria building. Proposed repairs to the main building include: re-securing of loose fascia flashing at the east end of the building, removal of debris from the roof and drains, securing of all drain strainers, replacement of corroded piping, securing of piping on roof blocking, replacement of damaged roof exhaust fans, identification of roof leaks and necessary repairs to damaged areas of the roof and interior, repair/replacement of electrical boxes and conduit on the roof, and repair of windows and gaskets. Proposed repairs to the cafeteria building include: removal of debris from the roof and drains, securing of the data cable at the canopy, installation of new vent covers, repair/ replacement of base flashing around skylights, securing roof drain strainers, replacement of missing strainers, replacement of temporarily repaired skylight, replacement of damaged roof exhaust fans, and repairs to window glass and gaskets blown out by high winds.

Site 26 - Murray Henderson Elementary School

The RSD intends to complete renovations to the roof of the Murray Henderson Elementary School, located at 1912 L. B. Landry Avenue. This REC addresses repairs made to the cafeteria, the south classroom, and northeast classroom buildings. Proposed repairs to the cafeteria consist of the removal and replacement of damaged gutters and downspouts at both the upper and lower roofs. Proposed repairs to the south classroom building include: installation of downspouts at all missing locations, investigation and possibly repair to soft roof spots and previously repaired structural damages, replacement of roof vent caps, and patching of the cracked roofing membrane. Proposed repairs to the northeast classroom consist of repairs to base flashing at the roof expansion joints.

Site 29 - John W. Hoffman Elementary School

The RSD intends to build a new, state-of-the art pre-kindergarten through eighth grade (pre-k through 8) elementary school at the pre-disaster Hoffman School Site, located at 2622 S. Prieur Street. This REC covers only the demolition of the original Hoffman Elementary School. This proposed scope of work includes the hazardous material abatement of Building H (an 11,550 square foot two-story brick structure), the removal of foundations and site elements, site grading and hydro-seeding, and the installation of a security fence.

Site 32 - Marquis Lafayette Elementary School

The RSD intends to complete renovations at the Marquis Lafayette Elementary School, located at 2727 S. Carrollton Avenue. This REC addresses the applicant's proposal to remove and replace the school's roof. Following inspections, the building gutters and downspouts would also be evaluated for removal and replacement.

Site 39 - McDonogh 28 Junior High School

The RSD intends to complete renovations to the roof of the McDonogh 28 Junior High School, located at 2733 Esplanade Avenue. This REC reviews the applicant's proposal to remove and replace: the roofing membrane, cants, blocking, and base flashing around the stair access to the raised roof. Proposed repairs to the interior include removal and replacement of the acoustic ceiling tile (including the grid), and cleaning and repair of water-damaged walls.

Site 40 - McDonogh 32 Elementary School

The RSD intends to complete renovations at the McDonogh 32 Elementary School, located at 800 DeArmas Street. Specifically, this REC addresses the applicant plans to complete building repairs for school buildings A, B, C & D. Proposed roof repairs include: Building A- removal of the gravel roof system (including insulation), application of bituminous waterproofing, installation of tapered insulation and either an Atactic Polypropylene (APP) or Styrene-Butadiene-Styrene (SBS) roofing system, removal and replacement of damaged roof penetrations, installation of roof fastening patterns to comply with International Building Code (IBC) and American Society of Civil Engineers (ASCE) 7 wind uplift requirements, and removal/ replacement of damaged interior elements (e.g. acoustic ceiling tiles, repair/painting of damaged walls); Building B- removal and replacement of damaged gutters and downspouts to match existing; Building C- removal of the existing asphalt shingle roof system and replacing it with a 20-year Class A asphalt roofing system, installation of roof fastening patterns to comply with IBC/ASCE 7 wind uplift requirements, removal and replacement of damaged wood fascia, removal and replacement of damaged gutters and downspouts (including connectors and splash blocks), removal of popcorn ceiling finish, and general repairs to other damaged ceiling areas; Building D- removal and replacement of damaged wood soffit and metal fascia.

Site 41 - McDonogh 42 Elementary School

The RSD intends to complete HVAC and roof renovations at the McDonogh 42 Elementary School, located at 1651 N. Tonti Street. This REC addresses the applicant's proposal to complete building repairs to the main building, the lodge building, and the library. Proposed repairs to the main building include: removal of the horizontal foam roof system and

replacing it with a new system-application of bituminous waterproofing, installation of tapered insulation and either an APP or SBS roofing system, removal and replacement of damaged roof penetrations, and repair/replacement of damaged interior elements (e.g. acoustic ceilings tiles and damaged walls). Proposed repairs for the lodge building include: removal of asphalt shingles and replacing them with a 20-year Class A asphalt shingles, installation of roof fastening patterns to comply with IBC/ASCE 7 wind uplift requirements, removal and replacement of damaged gutters and downspouts (including connectors and splash blocks). Proposed repairs for the library: removal of horizontal foam, application of bituminous waterproofing, installation of tapered insulation and either an APP or SBS roofing system, removal and replacement of damaged ceiling tiles, and repair and painting of damaged walls.

Site 46 - Sarah T. Reed Senior High School

The RSD intends to renovate the Sarah T. Reed High School, located at 5316 Michoud Blvd. This REC reviews the applicant proposal to salvage bleachers from the Booker T. Washington High School and relocate them to the Sarah T. Reed High School site.

Site 50 - Village de L'est Elementary School (Einstein Charter School)

The RSD intends to rehabilitate facilities at the Village de l'Est Elementary School site, located at 5100 Cannes Street. This REC covers the following proposed scope of work: building A-removal of the gravel-surfaced roof system (including insulation), application of bituminous waterproofing, installation of tapered insulation, installation of either an APP or SBS roofing system, removal and replacement of damaged roof penetrations, removal and replacement of associated roof elements (e.g. mansard standing seam metal roof panels, flashing, coping, fasteners, straps, treated wood blocking, internal drains, downspouts), removal and replacement of damaged wood soffits, evaluation and possible replacement of the roof's structural steel elements and corrugated steel deck, and replacement of ceiling tiles and grid as necessary; building B- removal and replacement of damaged asphalt shingles, roofing paper, 5/8-inch thick wood sheathing, continuous ridge vent, aluminum drip edge, fasteners, straps and treated wood blocking, wood fascia, gutters, downspouts and connectors, popcorn ceiling finish, and damaged ceiling areas; building C- removal and replacement of all asphalt roof shingles, roofing papers, wood sheathing, wood fascia, aluminum drip edge, and roof soffits.

In addition to the sites reviewed in the REC for Version 0, Attachment 6 of PW 19166 lists donor facilities also deemed eligible for alternate project funds (sites #61-89). Listed below are proposed scope changes for sites listed on Attachment 6.

Site 61 - Booker T. Washington High School

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-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 status.

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 for 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 for contaminants (e.g. asbestos, lead, biohazards) as necessary, and demolition of the 19,730 square foot cafeteria building.

Site 65 - George O. Mondy Elementary School

The RSD proposes stabilization and mothballing procedures for the main building and restroom building of the George O. Mondy Elementary School, located 2327 St. Philip Street, utilizing a three-phased approach.

Phase One activities would include assessment and analysis of the facilities. Specifically, the applicant will engage the architecture and engineering firm Verges Rome to determine the structural stability of the facilities and to design and execute structural plans that meet the specific conditions of the facilities.

Phase Two activities would include: debris removal, broom cleaning of the facilities, installation of a VPS that will provide passive ventilation and fire and security monitoring, repair of existing fencing, 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 for contaminants (e.g. asbestos, lead, biohazards).

Phase Three activities would include: stabilization or abatement of hazardous materials as needed, development of specifications for debris removal, the assembly and procurement of a bid package for hazardous materials, waste/debris stabilization or remediation, and the disconnection of utilities.

In addition to the proposed measures listed above, this REC also addresses the RSD's intentions to demolish two (2) one-story sloped-roofed, wood-framed modular building totaling 3,072 square feet, and the 2,100 square foot custodial lodge.

Site 66 - Louis D. Armstrong Elementary School

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 for 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 68- Andrew J. Bell Middle School

The RSD intends to make multiple repairs to the Andrew J. Bell Middle School campus, located at 1010 N. Galvez Street, including stabilization and shoring repairs to the main school building, stabilization and mothballing measures to multiple buildings on campus, and the demolition of the Custodial Cottage/building E.

Proposed shoring repairs to the main building consist of: installation of shoring block to support the existing roof perimeter walls, installation of shoring stacks, installation of wall tie-backs, repair/replacement of internal floor joists, and replacement of an existing stairway with metal construction stairs. This proposed scope of work is necessary to replace the current roof which is structurally unsound. The shoring stacks and associated equipment will be removed after the permanent repairs to the roof are complete; however, the metal construction stairs would remain even after all

repairs are complete. Utilizing a three-phased approach, the RSD also proposes stabilization and mothballing procedures for the Administration Building, Building B, and Building A. Phase One activities would consist of architectural and engineering analysis of the facilities (in coordination with a Historic Architecture Preservation Consultant). Phase Two would include: debris removal, broom cleaning of the facilities, installation of a VPS that will provide passive ventilation and fire and security monitoring, repair of existing fencing, installation of new perimeter fencing, pest control measures, installation of temporary and downspouts as necessary, detailing and securing of historic materials, and hazardous material testing and removal for contaminants (e.g. asbestos, lead, biohazards) as necessary. Phase Three activities would include: stabilization or abatement of hazardous materials as needed, the development of specifications for the debris removal of the facility, the assembly and procurement of a bid package for hazardous materials and waste/debris stabilization or remediation, and the disconnection of utilities. Finally, the applicant also proposes to demolish the Custodial Cottage/ Building E due to its structural instability.

Site 69 - John F. Kennedy High School

The RSD intends to demolish Building C of the John F. Kennedy High School, located at 5700 Wisner Boulevard. A recognized Superfund Site, contaminated soils remain beneath the facility and would be removed, pending the proposed demolition. The Louisiana Department of Environmental Quality (LDEQ) would supervise and direct the applicant in this endeavor. The applicant intends to sell or donate the property to another entity after the remaining contaminants have been removed/ remediated. Furthermore, a letter of "No Further Action" from LDEQ must be submitted to FEMA EHP upon completion of remediation activities.

Site 70 - Thomy Lafon Elementary School

The RSD intends to demolish Building C of the Thomy Lafon Elementary School, 2601 Seventh Street. Building C is a 12,432 square foot masonry structure.

Site 71 - Phillis Wheatley Elementary School

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-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.

Site 72 - Edgar P. Harney Elementary School

The RSD intends to make roof repairs to the main building of the Harney Elementary School, located at 2503 Willow Street. Specifically, proposed repairs include removal of temporary rake caps, installation of new rake or ridge caps, and replacement of damaged or missing downspouts (including connectors and/or elbows). All proposed work would include in-kind materials.

Site 73 - Albert Wicker Elementary School

The RSD intends to make repairs to the roof of the Wicker Elementary School, located at 2011 Bienville Street. Specifically, the applicant proposes the removal and replacement of the existing copper standing seam metal roof, including: underlayment, sloped wood sheathing, metal framing for room system, fasteners, adhesives, and caulk. Additionally, damaged flashing and the fixed dome window would also be removed and replaced.

Site 74 - A.P. Tureaud Elementary School

The RSD intends to repair the main building of the A.P. Tureaud Elementary School, located at 2021 Pauger Street. The proposed scope of work includes: removal of the temporary roofing system (including insulation, cant and flashing), installation of new roofing system, application of bituminous waterproofing, installation of tapered insulation and either an APP or SBS roofing system (including gypsum fiber cover board, roof edges, cants, flashing, and expansion joints), removal and replacement of damaged roof penetrations, and removal and replacement of damaged copper gutters and downspouts (including cleaning of the façade behind the downspouts.)

Site 75 - Andrew Jackson Elementary School

The RSD intends to make repairs to the roof and façade of the main building of the Andrew Jackson Elementary School, located at 1400 Camp Street. The proposed scope of work includes: removal/replacement of the cant strip and base flashing along the entire perimeter of the upper and lower roofs, replacement of the damaged foil flashing on the parapet wall, replacement of downspouts, repair of the façade behind the downspouts, repainting of damaged areas, identification of roof leaks and necessary repairs, and cleaning out of the underground downspout drain line. Non-permanent work covered by this REC includes: lift or crane rental, chute rental for demolition debris disposal,

dumpster rental/disposal, and site clean up.

Site 76 - Martin Luther King, Jr., Elementary School

The RSD intends to repair the Martin Luther King, Jr., Elementary School, located at 1617 Caffin Avenue. Proposed repairs for the main building include: removal of existing roof system; installation of new bituminous roofing system; installation of tapered insulation and SBB 2-ply roofing system; installation of roof edges, cants, flashing, and expansion joints; removal/replacement of damaged roof penetrations; removal/replacement of damaged panels, valley panels, underlayment, and wood sheathing; and the removal, inspection, cleaning, and resetting of existing windows. Additionally, this REC also covers the installation of a canopy, stair ramp, and deck system for three (3) modular classroom buildings located on campus.

Site 77 - Alfred Lawless High School

Per the Recovery School District and Orleans Parish School Board's 2008 "School Facilities Master Plan" to restore school facilities, the Alfred Lawless High School, located at 5300 Law Street, has been demolished. This REC covers the RSD's proposal to install new perimeter chain link fencing around the site. Specifically, the scope of work includes the removal of existing chain link fencing, installation of new chain link fencing around the perimeter of the school site, and the installation of double-swing gates to secure access to the property.

Site 78 - Harriet Tubman Elementary School

The RSD proposes to make repairs to Buildings A & B of the Harriet Tubman Elementary School, located at 2012 General Meyer Avenue. The proposed scope of work primarily consists of: removal of the whole asphalt shingle roof system (including roofing paper and wood sheathing); installation of 20 year Class A asphalt shingles, roofing paper, 5/8-inch thick wood sheathing, continuous ridge vent, aluminum drip edge and general miscellaneous roof items (e.g. fasteners, straps and treated wood blocking); installation of roof fastening patters to comply with IBC/ASCE 7 wind uplift requirements; removal of damaged wood fascia and installation of new painted material; removal and replacement of gutters and downspouts (including connectors and splash blocks). Additional proposed repairs to Building A include interior repairs to the boys restroom, including the repainting of the ceiling.

Site 79 - Thomas Alva Edison Elementary School

The RSD proposes to demolish two (2) modular classroom buildings at the Thomas Alva Edison Elementary School, located at 1339 Forstall Street.

Site 80 - Charles J. Colton Elementary School

The RSD intends to make repairs to the Charles J. Colton Elementary School, located at 2300 St. Claude Avenue. This REC reviews the applicant's proposal to remove 12- inches of existing soil under the footprint of the previous slab, which has already been removed, and replace it with stable soil which would include a geotextile fabric and clean river sand.

Lastly, in accordance with 44 CFR 13.36 and 13.37, this REC covers certain architectural and engineering (A&E) fees incurred during the formulation of the applicant's Revised Master Plan. Proposed A&E fees covered by this REC are attached and detailed in Attachment 90 of PW19166, pages 16-18. In addition to A&E fees authorized by 44 CFR 13.36 and 13.37, Attachment 90 also includes eligible fees incurred while commissioning LEED certification work.

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, LA. 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: Joseph Chauvin, Environmental Protection Specialist, FEMA LRO

Signature Joseph Chauvin Date 6/8/2012

FEMA Environmental Liaison Officer or Delegated Approving Official:

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

Signature LeSchina Holmes Date 06/08/2012

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 1 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 FEMA's Section 106 review of the proposed construction of new school facilities on recipient sites and the reasonably foreseeable effects of those 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 from.

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 Stipulation VII.E (2) of the RSD/OPSB 2PA, FEMA has determined that No Historic Properties are Affected by the recipient scopes of work in Version 1 for Sites 8, 26, 69, and 79. The review comments and associated SHPO/Tribal consultation for these undertakings is attached to PW 19166.

In accordance with Stipulation I.E of the RSD/OPSB 2PA, FEMA has determined that No Historic Properties are Affected by the recipient scope of work in Version 1 for Site 29. The review comments and associated SHPO/Tribal consultation for this undertaking is attached to PW 19166.

In accordance with Stipulation VI.A of the RSD/OPSB 2PA, FEMA has determined that the recipient scopes of work in Version 1 for Sites 11, 13, 19, 32, 39, 40, 41, 74, 75, 76, 77 and 78 meet the criteria in the Programmatic Allowances in Appendix C. In accordance with the RSD/OPSB 2PA, FEMA is not required to consult with the SHPO where work performed meets these criteria. The review comments for the individual sites are attached to PW 19166.

In accordance with Stipulation VII.E(1) of the RSD/OPSB 2PA, FEMA has determined that the recipient scopes of work in Version 1 for Sites 9, 18, 22, 25, 46, 50, 52, 72, 73, and 76 are not required to be reviewed by SHPO because the undertakings involve school facilities or campuses constructed after 1963. Additionally, there are no ground disturbing activities included in the scopes of work in Version 1. The review comments for the individual sites are

attached to PW 19166. Any change to the approved scope of work will require reevaluation under Section 106 of the NHPA.

In accordance with Stipulation IX.A.2 of the RSD/OPSB 2PA, FEMA has determined that there is an Adverse Effect to Historic Properties as a result of the recipient scopes of work in Version 1 for Sites 65 and 68. In accordance with Stipulation IX.A.2, FEMA recommended that the adverse effects resulting from the undertaking will be adequately mitigated through implementation of Standard Mitigation Measures. To remain in compliance with Section 106 of the NHPA and the RSD/OPSB 2PA, the mitigation measures, detailed within the attached Standard Mitigation Measure Agreements (SMMA) and summarized in the conditions section of the REC and PW 19166, must be carried out. The review comments and SMMA are attached to PW 19166.

In accordance with Stipulation VIII.C of the RSD/OPSB 2PA, FEMA has determined that there is No Adverse Effect to historic properties with conditions as a result of the recipient scopes of work in Version 1 for Sites 62-68 and 80. The review comments and SHPO/Tribal consultation for these undertakings is attached to PW 19166. The conditions for sites 62-68 and 80 are written in the conditions section of PW 19166 and the REC.

Site 80 is also subject to an SMMA as a result of scope of work in Version 0. This SMMA is still applicable and is attached to PW 19166.

FEMA determined that there would be an Adverse Effect to Historic Properties as a result of the recipient scopes of work in Version 1 for Sites 61, 70, and 71. FEMA 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 avoid, minimize, and mitigate the adverse effects of these Undertakings. To remain in compliance with Section 106 the NHPA stipulations and conditions detailed within the attached MOAs and summarized in the conditions section of the REC and PW 19166 must be carried out. The review comments and MOAs are attached to PW 19166.

The scope of work for the contributing projects for this PW are referred to as donor scope and fall into one of four categories: continued use, demolish, safe and secure, or mothballing. The donor scope for each of these projects is noted in attachment 6. FEMA has documented the NHPA review of these projects in their contributing PW; the review and conditions in the de-obligated contributing PWs are applicable.

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 proposed changes to the scope of work that FEMA determines may cause additional effects to historic properties. The review comments and conditions in the contributing PWs 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 made determinations of no historic properties affected, no adverse effect to historic properties, and adverse effect to historic properties, depending on the NRHP eligibility of the school and the surrounding neighborhood. 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, appropriate SHPO/Tribal consultation documents and a list of associated conditions, if applicable.

Mothballing

For schools with the donor scope of mothballing, FEMA has determined that there are no adverse effects (with conditions) to historic properties. 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, including those listed in the revised Master Plan titled "Revised amendments: October 2011"

(Attachment 90), meets the criteria in the RSD/OPSB 2PA, Appendix C: Programmatic Allowances, Item VII.D. In accordance with this 2PA, FEMA is not required to consult with the SHPO where work performed meets these criteria.

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: Joseph Chauvin, Environmental Protection 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: Joseph Chauvin, Environmental Protection 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: Joseph Chauvin, Environmental Protection 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 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).

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
- Are project conditions required? YES (see Section V) NO (**Review Concluded**)
- A Final Public Notice is required

Comments: Version 1 is a \$0.00 consolidation of a previously approved series of alternate or improved projects for ABFE flood elevations, administrative or A/E fees, and revisions to the Master Plan for this single settle request PW. By memorandums with various dates between July 2011 and May 16, 2012, 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: Alan A. Johnson, 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 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. 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. 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.
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 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.
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.

Environmental Conditions by site:

Site 65, George O. Mondy Elementary School

12. FEMA EHP has requested that a letter of "No Further Action" from LDEQ be submitted to FEMA, once the RSD has determined the level of contamination and developed a Corrective Action Plan (CAP) for LDEQ approval.

Site 69, John F. Kennedy High School

13. This project involves the demolition of a public structure at a known "Superfund Site". Beneath the existing/remaining school buildings shallow soils are known to contain elevated concentrations of lead, arsenic and BAP. After demolition of the buildings and removal of concrete floor slabs and footings, the vertical and lateral extent of soil contamination must be defined, in cooperation with the Louisiana Department of

Environmental Quality (LDEQ), and a soil removal and/or remediation plan will be approved and implemented.

14. A letter of "No Further Action" from LDEQ must be submitted to FEMA EHP upon completion of remediation activities.

Site 71, Phillis Wheatley Elementary School

15. RSD has initiated the transfer of all or portions of the Wheatley Main Classroom Building to a third party. RSD has fulfilled its responsibility to update FEMA of the status of the transfer in writing on or before January 31, 2011 and March 31, 2011.

Historic Preservation Conditions by site:

Site 61, Booker T. Washington High School

16. To remain in compliance with Section 106 of the NHPA and the MOA dated August 25, 2011 RSD must complete stipulations II. A (recording); 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. A report on the status of all stipulations is also attached to this PW.

Site 62, Israel Augustine Middle School

17. To remain in compliance with Section 106 of the NHPA and the RSD/OPSB 2PA, RSD must complete the conditions detailed in the attached FEMA consultation letters dated March 30, 2011 and April 21, 2011; and SHPO response dated May 10, 2011. The following conditions, summarized below, are not yet fulfilled:
 - 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

18. To remain in compliance with Section 106 of the NHPA and the RSD/OPSB 2PA, RSD must complete the conditions detailed in the attached FEMA consultation letters dated April 11, 2011 and April 21, 2011; and SHPO response dated May 5, 2011. The following conditions, as summarized below, are not yet fulfilled:
 - 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

19. To remain in compliance with Section 106 of the NHPA and the RSD/OPSB 2PA, RSD must complete the conditions 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. The following conditions, as summarized below, are not yet fulfilled:

- 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 65, George O. Mondy Elementary School

20. 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. These are detailed in the attached FEMA consultation letter dated September 16, 2011; SMMA dated October 28, 2011; and the SHPO response dated November 22, 2011. The A report on the status of all standard mitigation measures for the Custodial Lodge is also attached to this PW.

For the demolition of Portable Buildings and mothballing of Main Building:

- 1) Remove the foundations of the Portable Buildings in order to minimize ground-disturbance. There shall be no salvage of architectural material from below-grade.
- 2) Placement of equipment shall be confined to areas where soils have been previously disturbed by activities, such as site development, construction, surface grading, utility trenching, landscaping, etc.
- 3) When heavy equipment is not in use, it shall be staged on hard or firm surfaces where equipment is not susceptible to sinking. Paved surfaces shall be used to the fullest extent possible.
- 4) Tracked vehicles and/or large-tired equipment shall be used whenever possible to reduce the depth of soil disturbance and minimize soil compaction to a depth of eight (8) inches or less.
- 5) Excavation of on-site soil materials and burial of debris are not permitted.
- 6) RSD will record the Main Building with digital photographs.
- 7) For the Main Building, provide Security and Maintenance Schedule; Conditions Survey; and Monitoring Report.
- 8) Notify FEMA when the property is to be transferred to OPSB and update this notice following the actual transfer.
- 9) Perform all work in accordance with the National Park Service's Preservation Brief 31 and RSD's clarifying comments regarding mothballing.
- 10) 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.
- 11) Upon transfer of the property to OPSB, FEMA will re-initiate SHPO consultation.

For the demolition of the Custodial Lodge:

- 12) FEMA generally requires that no ground disturbance occur during demolition.
- 13) All equipment and machinery used during demolition will be staged on the concrete slab surrounding the structure.
- 14) The slab will remain in place and not be removed through excavation.
- 15) Utility lines will be disconnected and capped at grade.
- 16) Piers will be shorn off at-grade with no below-ground excavation.

- 17) There will be no salvage of architectural materials from below-grade.
- 18) Excavation of on-site materials and burial of debris are not permitted.

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 66, Louis Armstrong Elementary School

21. 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

22. 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

23. 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. These conditions are also detailed in the attached FEMA consultation letter dated August 24, 2011; the attached SMMA dated September 21, 2011; and SHPO response dated October 19, 2011. A report on the status of all standard mitigation measures for the Custodial Lodge is also attached to this PW.

For the mothballing of Buildings A, B, and Administration:

- 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.

For the demolition of the Custodial Lodge:

- 7) 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.
- 8) 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.
- 9) Prepare an archaeological report and submit in accordance with attached letter.
- 10) 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

24. 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. A report on the status of all stipulations is also attached to this PW.

Site 71, Phillis Wheatley Elementary School

25. 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. A report on the status of all stipulations is also attached to this PW.

Site 80, Charles J. Colton Elementary School

26. To remain in compliance with Section 106 of the NHPA and the RSD/OPSB 2PA the mitigation measures IX.2 (b), IX.A.2 (c) and IX.A.2 (d), detailed within the attached SMMA dated June 21, 2010 must be carried out. A report on the status of all standard mitigation measures is also attached to this PW.

In Version 1, Site 80 and Site 10 are both for Colton JHS, the same comment applies.