

Record of Environmental Consideration

REVISED FOR FEMA ENVIRONMENTAL -- LOUISIANA -- April 2007

See 44 Code of Federal Regulation Part 10

Project Name/Number: McDonogh 42 Elementary School Renovations/Addition
AI: 2110
FIPS: 033-UA9M2-00
DR 1603-LA
Associated PW: 19166, 16515, 15144, 15043

Applicant Name: Recovery School District

Project Locations: 1668 North Rocheblave Street, New Orleans, LA 70112
Latitude/Longitude: 29.978675, -90.071679

Project Description:

On August 29, 2005, Hurricane Katrina and its aftermath caused wind and flood damage to multiple RSD (the Applicant) facilities. Per RSD's and Orleans Parish School Board's (OPSB) "School Facilities Master Plan," these facilities have been approved for repair or replacement. Furthermore, the applicant has been granted a Single Settlement Request (SSR, Project Worksheet 19166) to utilize FEMA grant funding for the reconstruction of the New Orleans Public Schools in accordance with this master plan. This EHP Record of Environmental Consideration (REC) addresses the Applicant's request to amend the SSR for the renovation and addition to McDonogh 42 Elementary School located at 1668 North Rocheblave Street, New Orleans, LA 70112.

The Department of Homeland Security (DHS) and the White House Council on Environmental Quality (CEQ) have established Alternative Arrangements (AA) to meet the requirements of the National Environmental Policy Act (NEPA) and the CEQ Regulations for Implementing the Procedural Requirements of NEPA to Reconstruct Critical Infrastructure in the New Orleans Metropolitan Area (NOMA). AA will enable the Federal Emergency Management Agency (FEMA), as a component of DHS, to consider the potential for significant impacts to the human environment from its approval to fund the reconstruction of critical physical infrastructure in NOMA. This proposed project meets AA qualifications for the Reconstruction of Critical Infrastructure in the NOMA. For more information visit www.fema.gov/plan/ehp/noma/index.shtm

FEMA's Environmental and Historic Preservation (EHP) Department at the Louisiana Recovery Office (LRO) has determined through its Special Considerations review that the RSD's public involvement process meets the requirements of the NEPA and AA. Those requirements comply with the programmatic agreement between the CEQ, DHS, and FEMA. As part of the Greater New Orleans Area critical infrastructure, this project qualifies for expedited considerations under the Alternative Arrangements for NEPA compliance. The AA process (www.fema.gov/plan/ehp/noma) has been activated to address the basic elements of NEPA for actions taken to restore critical infrastructure devastated by Hurricane Katrina

This REC specifically addresses the applicant's proposal to renovate the main building, library, and custodial lodge, as well as the addition of a new cafeteria. McDonogh 42 Elementary School, built in 1925, is a 61, 422 square foot facility with existing brick veneer over multi-wythe load bearing masonry. The addition will include a new 3403 square foot cafeteria attached to the main building. The addition will consist of metal panels over structural metal stud framing, aluminum and class curtain walls, and a modified bituminous membrane insulated roof. Renovations to the building will include the following work:

- Demolition and Site Preparation – selective demolition of building interiors and removal of pavement and landscaping
- Site Work - removal and replacement of surface features around the main structure, refurbishment of

green space and additional land grading structures, refurbishment of utilities, repavement of existing surfaces and pave new surfaces, build erosion control structures, relocation of the playground, replacement of fencing, building of bicycle racks, removal of underground piping, and removal of damaged power and light poles.

- **Environmental** – The findings in report NO EY 127058 Phase I Environmental Site Assessment (Phase I ESA) conducted on June 14, 2012 as well as the findings of a Limited Site Investigation (LSI) report conducted on January 4, 2013 require an Additional Site Investigation Report (ASIR). The ASIR was completed on July 29, 2013 and the results must be submitted to the Louisiana Department of Environmental Quality (LDEQ). LDEQ may require additional testing according to LDEQ’s Risk Evaluation Corrective Action Program (RECAP) evaluation. If necessary, the additional testing of soil and groundwater contamination in accordance with the U.S. Environmental Protection Agency (EPA) Field Branch Quality System and Technical Procedures will be conducted. LDEQ will issue a no further action plan or may require additional requirements under a corrective action plan. All LDEQ action plans must be submitted to FEMA for the permanent files.

National Environmental Policy Act (NEPA) Determination

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

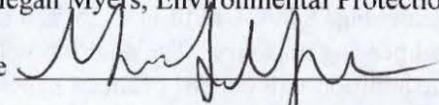
Comments: Based on documentation provided by the applicant, FEMA’s Environmental/Historic Preservation Section and Alternatives Arrangement team determined that the Recovery School District and the Orleans Parish School Board provided sufficient documentation to demonstrate a satisfactory public involvement process for rebuilding schools in Orleans Parish, LA. Any changes to the scope of work will require re-submission through the state to FEMA and requires re-evaluation for compliance with national environmental policies. The applicant is responsible for obtaining and complying with all local, state and federal permits. Non-compliance with this requirement may jeopardize receipt of federal funds. M. Myers, Environmental Protection Specialist

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

Reviewer and Approvals

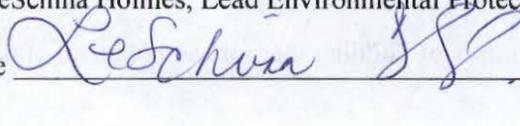
FEMA Environmental Reviewer:

Name: Megan Myers, Environmental Protection Specialist, FEMA LRO

Signature  Date 08/05/2013

FEMA Environmental Liaison Officer or Delegated Approving Official:

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

Signature  Date 08/05/2013

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 dated August 17, 2009 **(Review Concluded)**
- Applicable executed Programmatic Agreement (August 17, 2009 as amended on July 22, 2011). 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: 7/22/13 - FEMA has determined in a letter dated June 19, 2013, that there will be "No Adverse Effect" to historic properties. SHPO concurrence with this determination was received, dated July 3, 2013. Consultation with affected tribes (Jena Band of Choctaw Indians; Alabama-Coushatta Tribe of Texas; and Choctaw Nation of Oklahoma) was conducted per Stipulation VII.E (2) of FEMA's Secondary Programmatic Agreement Regarding New Orleans School Facilities Master Plan (2PA) dated August 17, 2009. Additionally, consultation with affected tribes (Coushatta Tribe of Louisiana; Mississippi Band of Choctaw Indians; Quapaw Tribe of Oklahoma; Seminole Nation of Oklahoma; and Tunica-Biloxi Tribe of Louisiana) was conducted per FEMA's Programmatic Agreement dated August 17, 2009 and amended on July 22, 2011 (PA). The Choctaw Nation of Oklahoma submitted written concurrence with the determination. The remaining Tribes did not object within the regulatory timeframes; therefore, in accordance with the 2PA, Stipulation VIII.E(1) of the PA and 36 CFR part 800.5(c)1, FEMA may proceed with funding the undertaking assuming concurrence. The applicant must comply with the NHPA conditions set forth in the PW.

If there is a substantial change to the design of the building that differs from the Bid Documents dated April 12, 2013, RSD must submit schematics and/or drawings of the proposed changes for review by FEMA and a justification for why the changes were made. FEMA will review the materials to determine if the proposed work would cause additional adverse effects to the Esplanade Ridge Historic District as defined in 36 CFR §800.5(a)(1) and the examples provided in 36 CFR §800.5(a)(2), and will notify RSD within 15 days of the results of its review. FEMA will informally consult with SHPO as a part of this review. If FEMA determines that a change to the scope of work may result in an adverse effect as defined in 36 CFR §800.5(a)(1) and the examples provided in 36 CFR §800.5(a)(2), FEMA will re-initiate consultation under Stipulation IX. Of the RSD/OPSB 2PA.

Correspondence/Consultation/References: Sherry Anderson, Historic Preservation Specialist; Mike Wilder, Archeology Specialist

B. Endangered Species Act

No listed species and/or designated critical habitat present in areas affected directly or indirectly by the Federal action.

(Review Concluded)

Listed species and/or designated critical habitat present in the areas affected directly or indirectly by the Federal action.

No effect to species or designated critical habitat. (See comments for justification)

Are project conditions required? Yes (see Section V) No **(Review Concluded)**

May affect, but not likely to adversely affect species or designated critical habitat (FEMA determination/USFWS/NMFS concurrence on file) **(Review Concluded)**

Are project conditions required? Yes (see Section V) No **(Review Concluded)**

Likely to adversely affect species or designated critical habitat

Formal consultation concluded. (Biological Assessment and Biological Opinion on file)

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

Comments: Project is located in an urban or previously disturbed area. No listed species and/or designated critical habitat present in areas affected directly or indirectly by the federal action. The scope of work for this project does not require U.S. Fish and Wildlife Service (USFWS) consultation as per FEMA/USFWS disaster consultation letter dated September 15, 2005. Review concluded.

Correspondence/Consultation/References: USFWS emergency consultation provisions determined in letters dated September 15, 2005 for Hurricane Katrina. See also ESA and MBTA Project Review tool (www.fws.gov/lafayette) accessed 7/22/2013. M. Myers, 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 is not within a CBRA zone.

Correspondence/Consultation/References: Louisiana CBRS Maps referenced 7/26/2013, M. Myers, Environmental Protection Specialist

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: Project will not affect waters of the United States.

Correspondence/Consultation/References: USFWS National Wetlands Inventory map (<http://www.nepassisttool.epa.gov/nepamap.aspx>) queried on 7/26/2013. M. Myers, 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 Zone. See conditions.
Correspondence/Consultation/References: Louisiana Coastal Zone maps queried 7/26/2013. M. Myers, Environmental Protection Specialist

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: NEPAassist Map (<http://www.nepassisttool.epa.gov/nepamap.aspx>) queried on 7/26/2013, M. Myers, Environmental Protection Specialist

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. See conditions.
Correspondence/Consultation/References: M. Myers, Environmental Protection Specialist

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 site is located within an existing urban and developed area and FPPA is precluded.
Correspondence/Consultation/References: National Resource Conservation Service, Web Soil Survey (<http://websoilsurvey.nrcs.usda.gov/app/>) referenced 7/26/2013. M. Myers, 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 site is an existing disturbed area 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. M. Myers, Environmental Protection Specialist

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: NEPAAssist Map (<http://www.nepassistool.epa.gov/nepamap.aspx>) referenced 7/26/2013, M. Myers, Environmental Protection Specialist

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 is not along and does not affect Wild or Scenic River (WSR).

Correspondence/Consultation/References: National Wild and Scenic Rivers (<http://www.rivers.gov>) referenced 7/26/2013, M. Myers, Environmental Protection Specialist

L. Resource Conservation and Recovery Act

Comments: 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 must 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. See conditions.

Correspondence/Consultation/References: M. Myers, Environmental Protection Specialist

M. Other Relevant Laws and Environmental Regulations

Comments: This project involves the demolition or renovation, of a facility constructed prior to 1978 that may contain surfaces coated with Lead-Based Paint (LBP). The applicant is responsible for complying with the Toxic Substances Control Act (TSCA) Section 402(c)(3) requirements. All coordination pertaining to these activities should be documented and copies forwarded to the state and FEMA as part of the permanent project files. See conditions.

Correspondence/Consultation/References: M. Myers, Environmental Protection Specialist

II. Compliance Review for Executive Orders

A. E.O. 11988 - Floodplains

- No Effect on Floodplains/Flood levels and project outside Floodplain - **(Review Concluded)**
- Located in Floodplain or Effects on Floodplains/Flood levels
 - No adverse effect on floodplain and not adversely affected by the floodplain. **(Review Concluded)**.
Are project conditions required? Yes (see Section V) No **(Review Concluded)**
 - Beneficial Effect on Floodplain Occupancy/Values **(Review Concluded)**.
 - Possible adverse effects associated with investment in floodplain, occupancy or modification of floodplain environment
 - 8 Step Process Complete - documentation on file
Are project conditions required? YES (see Section V) NO **(Review Concluded)**
 - A Final Public Notice is required

Comments: The Parish of Orleans enrolled in the National Flood Insurance Program (NFIP) on 3/13/1970. As per revised Preliminary Digital Flood Insurance Rate Map Panel Number 22071C227F dated 11/9/2012, the site is located within shaded Zone X, areas protected by levees from the 1% annual chance flood. Project is for the renovation and new construction of a facility. See conditions.

Correspondence/consultation/references: J. Renne, 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: A review of the National Wetland Inventory (NWI) online mapper, accessed on 7/26/2013, for the site indicates that the area is not located within a designated wetland. Review concluded.

Correspondence/Consultation/References: U.S. FWS NWI map accessed at NEPAassist Map (<http://www.nepassisttool.epa.gov/nepamap.aspx>) 7/26/2013. M. Myers, Environmental Protection Specialist

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: The populations within zip code 70112 are: 34.8% White, 60.4% Black, and 5.3% Hispanic. The median household income in 2012 was \$37,325 and 25.7 % of persons are below poverty level. A comprehensive master plan has been prepared for Orleans Parish, *The School Facilities Master Plan for Orleans Parish (Master Plan)*, which supports OPSB's compliance with NEPA and Executive Order 12898 (EO) considering Environmental Justice (EJ). This Master Plan identified effects to low-income and minority populations and potential effects to Indian Tribes (See Attached Master Plan document detailing the NEPA EJ efforts).

Correspondence/Consultation/References: *Amended School Facilities Master Plan for Orleans Parish, February 23, 2012*, Megan Myers, Environmental Protection Specialist

Control Act (TSCA) Section 402(c)(3) requirements. All coordination pertaining to these activities should be documented and copies forwarded to the state and FEMA as part of the permanent project files.

5. Applicant must provide FEMA with all LDEQ documentation involving additional testing requirements, no further action plans, or corrective actions plans.
6. 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.
7. Per RSD/OPSB 2PA, Stipulation X.A-E, Discoveries and Unexpected Effects, RSD will ensure that its construction contractor immediately stops work in the vicinity of an archaeological discovery; RSD will notify FEMA of the discovery within seventy-two (72) hours.
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 applicant will not proceed with work until FEMA HP completes consultation with the SHPO. RSD will notify FEMA of any change to the scope of work, which may result in additional SHPO consultation.
9. If there is a substantial change to the design of the building that differs from the Bid Documents dated April 12, 2013, RSD must submit schematics and/or drawings of the proposed changes for review by FEMA and a justification for why the changes were made. FEMA will review the materials to determine if the proposed work may cause additional adverse effects to the Esplanade Ridge Historic District as defined in 36 CFR §800.5(a)(1) and the examples provided in 36 CFR §800.5(a)(2), and will notify RSD within 15 days of the results of its review. FEMA will informally consult with SHPO as a part of this review. If FEMA determines that a change to the scope of work may result in an adverse effect as defined in 36 CFR §800.5(a)(1) and the examples provided in 36 CFR §800.5(a)(2), FEMA will re-initiate consultation under Stipulation IX. Of the RSD/OPSB 2PA.
10. Per 44 CFR 9.11(d)(3), there shall be no new construction or substantial improvement of structures involving a critical action unless the lowest floor of the structure (including the basement) is at or above the level of the base flood. Furthermore, per 44 CFR 9.11(d)(6), no project should be built to a floodplain management standard that is less protective than what the community has adopted in local ordinances through their participation in the National Flood Insurance Program. The applicant is required to coordinate with the local floodplain administrator regarding floodplain permit(s) prior to the start of any activities. All coordination pertaining to these activities and applicant compliance with any conditions should be documented and copies forwarded to the LA GOHSEP and FEMA for inclusion in the permanent project files. Per 44 CFR 9.11(d)(9), for the replacement of building contents, materials and equipment, where possible, disaster-proofing of the building and/or elimination of such future losses should occur by relocation of those building contents, materials and equipment outside or above the base floodplain.