

Record of Environmental Consideration

REVISED FOR FEMA ENVIRONMENTAL -- LOUISIANA -- April 2007

See 44 Code of Federal Regulation Part 10

Project Name/Number: George O. Mondy Elementary School Stabilization – Main & Restroom Bldgs.
FIPS#: 033-UA9M2-00/ **AI No. 1320**

Applicant Name: Recovery School District

Project Locations: George O. Mondy Elementary School - Location: 29.97066, -90.07698
2327 St. Philip Street, New Orleans, LA 70119

Project Description:

On August 29, 2005, Hurricane Katrina and its aftermath caused wind and flood damages to facilities at the Recovery School District George O. Mondy Elementary School. The Orleans Parish School Board and the Recovery School District prepared a Schools Facilities Master Plan for Orleans Parish for renovations and rebuilding of schools following Katrina. The Applicant plans to stabilize/mothball the Main Building and the Restroom Building on the school campus in a three phase approach

Phase One: This phase will include the assessment and analysis of the facility already provided for in the Master Plan scope of work for architects and engineers. The Applicant will engage the architecture and engineering firm, Verges Rome, to determine the structural stability of the facility and design and execute a structural plan as necessary to the specific conditions of the facility. The work will be procured in accordance with State bid laws. Drawings and specifications will be submitted to FEMA to consult with SHPO as well as to GOHSEP as they become available.

Phase Two: The Applicant will clean out the debris and broom clean the facility, secure doors and other entry points on the first floor of the facility by installing the Vandal Protection System (VPS) which will provide passive ventilation and provide ongoing fire alarm, security, and monitoring. The Scope of Work in this phase will repair existing or install new temporary perimeter fencing, maintain pest control, install temporary gutters and downspouts if necessary, inventory and secure historic materials (including removal to storage if unavoidable), and conduct hazardous materials testing for asbestos, lead, biohazards, and other contaminants.

Phase Three: The Applicant will develop guidelines for the stabilization or abatement of hazardous materials if needed, the development of specifications for the removal of debris from the facility, the assembly and procurement of a bid package for hazardous materials and waste/debris stabilization of remediation, and the disconnection of utilities.

The Applicant will provide a U.S. Secretary of Interior (SOI) qualified Historic Architect or Historic Preservation Consultant to ensure that the work complies with measures recommended in National Park Service (NPS) Brief (31) on Mothballing as well as the Mothballing plan presented to FEMA EHP and FEMA's SHPO liaison.

The Department of Homeland Security (DHS) and the Council on Environmental Quality (CEQ) have established Alternative Arrangements 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. These alternative arrangements will enable 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 project qualifies as an Alternative Arrangement for the Reconstruction of Critical Infrastructure in the New Orleans Metropolitan Area. For more information visit www.fema.gov/plan/ehp/noma/index.shtm

The Federal Emergency Management Agency (FEMA), Environmental and Historic Preservation (EHP) Division at the Louisiana Recovery Office has determined through its Special Considerations review that Facility Planning and Control (Applicant) public involvement process meets the requirements of the National Environmental Policy Act (NEPA) Alternative Arrangements (AA). Those requirements comply with the programmatic agreement between the White House Council on Environmental Quality, the Department of Homeland Security, and FEMA.

National Environmental Policy Act (NEPA) Determination

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

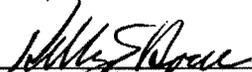
Comments: Based on documentation provided by the sub-applicant, FEMA's Environmental / Historic Preservation Section and Alternatives Arrangement team determined that the Recovery School District and the Orleans Parish School Board provided sufficient documentation to demonstrate a satisfactory public 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.

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

Reviewer and Approvals

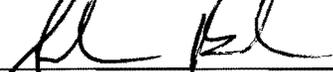
FEMA Environmental Reviewer:

Name: Kelly E. Rowe, Environmental Specialist, FEMA LRO

Signature  Date 11-30-11

FEMA Environmental Liaison Officer or Delegated Approving Official:

Name: Adam Borden, Environmental Team Lead, FEMA LRO

Signature  Date 11/30/11

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 attached/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: A review of this project was conducted in accordance with FEMA's Secondary Programmatic Agreement Regarding New Orleans School Facilities Master Plan dated August 17, 2009 (RSD/OPSB 2PA). FEMA has determined that there is a conditional No Adverse Effect to Historic Properties as a result of the proposed undertaking and provided the SHPO, Tribes (Jena Band of Choctaw Indians, Alabama-Coushatta Tribe of Texas, Choctaw Nation of Oklahoma, Coushatta Tribe of Louisiana; Mississippi Band of Choctaw Indians; Quapaw Tribe of Oklahoma; Seminole Nation of Oklahoma; and Tunica-Biloxi Tribe of Louisiana) and Consulting Parties (State of Louisiana Division of Administration, Office of Community Development, Disaster Recovery Unit; Advisory Council on Historic Preservation; Louisiana Department of Education, through its Recovery School District; Orleans Parish School Board; Governor's Office of Homeland Security and Emergency Preparedness; Preservation Resource Center; and DOCOMOMO US/Louisiana Chapter) the opportunity to review and comment. SHPO concurrence with FEMA's determination was received, dated 10/4/2011. The Tribes did not object within the regulatory timeframes; therefore, in accordance with Stipulation VIII.C of the 2PA, Stipulation VIII.F(1) of the 2009 Statewide 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 below. Any change to the approved scope of work will require reevaluation under Section 106.

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 developed area. Neither listed species nor their habitat occur in or near this site, thus FEMA finds there will be no effect to threatened or endangered species.
Correspondence/Consultation/References: USFWS emergency consultation provisions determined in letters dated September 15, 2005 for Katrina.

C. Coastal Barrier Resources Act

- Project is not on or connected to CBRA Unit or Otherwise Protected Area (**Review Concluded**).
- Project is on or connected to CBRA Unit or Otherwise Protected Area. (FEMA determination/USFWS consultation on file)
- Proposed action an exception under Section 3505.a.6 (**Review Concluded**)
- Proposed action not excepted under Section 3505.a.6.
- Are project conditions required? YES (see Section V) NO (**Review Concluded**)

Comments: Project is not within a CBRA zone.

Correspondence/Consultation/References: Louisiana Coastal Barrier Resource System Maps referenced November 29, 2011.

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 area.

Correspondence/Consultation/References: USFWS National Wetlands Inventory map (<http://www.fws.gov/nwi/>) queried on November 29, 2011.

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. Projects within the coastal zone may require a coastal use permit or other authorization from LADNR. Projects may be coordinated by contacting LA DNR at 1-225-342-9232.

Correspondence/Consultation/References: Louisiana Coastal Zone maps queried November 29, 2011.

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 November 29, 2011

G. Clean Air Act

- Project will not result in permanent air emissions. (**Review Concluded**)
- Project is located in an attainment area. (**Review Concluded**)
- Project is located in a non-attainment area.
- Coordination required with applicable state administering agency.
- Are project conditions required? YES (see section V) NO (**Review Concluded**)

Comments: The proposed project includes activities that would produce a minor, temporary, and localized impact on air quality from vehicle emissions and fugitive dust particles. No long-term air quality impact is anticipated.
Correspondence/Consultation/References: EPA Region 6 Non-attainment Map

H. Farmland Protection Policy Act

- Project will not affect undisturbed ground. **(Review Concluded)**
- Project has a zoning classification that is other than agricultural or is in an urbanized area. **(Review Concluded)**
- Project does not affect designated prime or unique farmland. **(Review Concluded)**
- Project causes unnecessary or irreversible conversion of designated prime or unique farmland.
 - Coordination with Natural Resources Conservation Service required.
 - Farmland Conversion Impact Rating, Form AD-1006, completed.
Are project conditions required? YES (see section V) NO **(Review Concluded)**

Comments: The site is located within an existing urban and developed area and FPPA is precluded.
Correspondence/Consultation/References: Kelly E. Rowe, Environmental Specialist

I. Migratory Bird Treaty Act

- Project not located within a flyway zone **(Review Concluded)**
- Project located within a flyway zone.
 - Project does not have potential to take migratory birds **(Review Concluded)**
Are project conditions required? Yes (see section V) No **(Review Concluded)**
 - Project has potential to take migratory birds.
 - Contact made with USFWS
Are project conditions required? YES (see section V) NO **(Review Concluded)**

Comments: The 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.

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 November 29, 2011.

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.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

NA

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 – Orleans Parish Advisory Base Flood Elevation Maps (ABFEs) were issued June 2006. This site is shown on ABFE Panel LA-DD31, as in Zone ABFE, EL 1.5 (NGVD), or 3 feet above the Highest Existing Adjacent Grade (HEAG). Orleans Parish Preliminary DFIRMs were issued November 2008. The site is shown on DFIRM Panel 22071C0230F, as in Zone AE EL 0 (NAVD). The applicant is required to coordinate with the local floodplain administrator regarding floodplain permit(s) prior to the start of any activities. 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. Hazardous materials need to be elevated above the 0.2 % annual chance (500-year) flood elevation. A cumulative final public notice was published 10/26/07 - 11/02/07 and is attached or on file.

B. E.O. 11990 - Wetlands

- No Effects on Wetland(s) and/or project located outside Wetland(s) - **(Review Concluded)**
- Located in Wetland or effects Wetland(s)
 - Beneficial Effect on Wetland - **(Review Concluded)**
 - Possible adverse effect associated with constructing in or near wetland
 - Review completed as part of floodplain review
 - 8 Step Process Complete - documentation on file
Are project conditions required? YES (see Section V) NO **(Review Concluded)**

Comments: None

Correspondence/Consultation/References: U.S. FWS NWI map accessed on-line November 29, 2011.

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 percent populations of 70119 are: 23.3 % White, 72.1 % African-American, 5.6 % Hispanic. The median household income in 1999 was \$ 21,297.00 and 29.2 % of families are below poverty level.
Correspondence/Consultation/References: Kelly E. Rowe, Environmental Specialist

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. The Applicant will not remove the foundations of the two (2) portable buildings in order to minimize ground-disturbance. There shall be no salvage of architectural materials from below-grade.
2. During demolition activities: 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. 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.
3. 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.
4. Excavation of on-site soil materials and burial of debris are not permitted.
5. RSD will record the main building with digital photographs as per Appendix E of the RSD/OPSB 2PA, that states, in part, that prior to implementing an undertaking to land bank a facility, the National Register eligible buildings will be recorded. RSD will submit a list of proposed photographs in accordance with Appendix E. Recordation to

- be completed within three (3) months after project obligation. Photographs to include at a minimum: Four (4) elevation views; Four (4) oblique views; Two (2) contextual views; Character Defining Features (interior and exterior).
6. RSD will provide FEMA with a Security and Maintenance Schedule for the main building.
 7. RSD will submit a written Conditions Survey (interior and exterior) for the main building for review within three (3) months after project obligation to include: an assessment to determine need for further structural analysis; an assessment as to whether proposed actions will substantially arrest deterioration; an assessment of drainage and plan for reducing ground moisture near building if needed; a timeline for proposed use and/or disposition of building.
 8. RSD will submit a Monitoring Reports for review to FEMA within six (6) months after project obligation, and every six (6) months thereafter or until the building is either re-used or responsibility for the building is transferred to another entity.
 9. RSD will notify FEMA when the property is to be transferred to OPSB and will update this notice following the actual transfer.
 10. RSD will perform all work in accordance with the National Park Service's Preservation Brief 31 and RSD's clarifying comments regarding mothballing dated May 17, 2010 (attached hereto).
 11. RSD must comply with the Louisiana Unmarked Human Burial Sites Preservation Act (R.S. 8:671 et seq).
 12. RSD will 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.
 13. Louisiana Unmarked Human Burial Sites Preservation Act: 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.
 14. Inadvertent Discovery Clause: 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.
 15. 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.
 16. 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.
 17. This project involves the partial demolition of public structures 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.
 18. The applicant is required to coordinate with the local floodplain administrator regarding floodplain permit(s) prior to the start of any activities. 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. Hazardous

materials need to be elevated above the 0.2 % annual chance (500-year) flood elevation. A cumulative final public notice was published 10/26/07 - 11/02/07 and is attached or on file.

8-STEP PROCESS CHECKLIST

Recovery School District George O. Mondy Elementary School-Main & Restroom Bldgs. Stabilization Orleans Parish

Date: 11/29/2011
Prepared by: Kelly E. Rowe, CFM, Environmental/Floodplain Specialist, FEMA EHP
Project Title: George O. Mondy Elementary School-Main & Restroom Bldgs. Stabilization
Location: Orleans Parish, Louisiana
(Latitude: 29.97066; Longitude: -90.07698)

FEMA-1603-DR-LA

EO 11988-FLOODPLAIN MANAGEMENT EO 11990-WETLAND PROTECTION

STEP 1 Determine whether the proposed action is located in a wetland and/or the 100-year floodplain (500-year floodplain for critical actions [44 CFR 9.4]), or whether it has the potential to affect or be affected by a floodplain or a wetland (see 44 CFR 9.7).

- The specific project sites are located in a floodplain as mapped on Preliminary DFIRM No. 22071C0230F, dated November 13, 2008, within Zone AE (EL 0); special flood hazard area inundated by 100-year flood; base flood elevations (BFE) determined.
- The project is located in a wetland as identified by:

STEP 2 Notify the public at the earliest possible time of the intent to carry out an action in a floodplain or wetland, and involve the affected and interested public in the decision making process (see 44 CFR 9.8).

- Not applicable - Project is not located in a floodplain or in a wetland.
- Applicable - Notice will be or has been provided by:

A cumulative Initial Public Notice was published statewide
October 21st – November 2nd, 2008.

STEP 3 **Identify and evaluate practicable alternatives to locating the proposed action in a floodplain or wetland (including alternative sites, actions and the "no action" option) [see 44 CFR 9.9]. If a practicable alternative exists outside the floodplain or wetland, FEMA must locate the action at the alternative site.**

Not applicable - Project is not located in a floodplain or in a wetland.

Applicable - Alternatives identified in the EA Document or described below:

Alternative 1: No action would leave the damaged school campus in continued disrepair with inadequate facilities to meet the educational needs of the students in the community near the school site.

Alternative 2: Relocating these facilities outside the 100-year flood event elevation. The area is predominantly composed of special flood hazard areas. The students and community will likely not commute to facilities outside the 100-year flood event area due to the significant distances involved in the commute.

Alternative 3: Renovation/stabilization of these facilities to meet the educational needs of the students in the community.

STEP 4 **Identify the full range or potential direct or indirect impacts associated with the occupancy or modification of floodplains and wetlands, and the potential direct and indirect support of floodplain and wetland development, that could result from the proposed action (see 44 CFR 9.10).**

Not applicable - Project is not located in a floodplain or in a wetland.

Applicable - Alternatives identified in the EA Document or described below:

The project will maintain services within the floodplain and should not have an adverse affect upon the floodplain or wetlands.

STEP 5 **Minimize the potential adverse impacts and support to or within floodplains and wetlands to be identified under step # 4, restore and preserve the natural and beneficial values served by floodplains, and preserve and enhance the natural and beneficial values served by wetlands (see 44 CFR 9.11).**

Not applicable - Project is not located in a floodplain or in a wetland.

Applicable - Mitigation measures identified in the EA Document or described below:

In compliance with 44 CFR 9.11, mitigation and minimization standards will be considered and applied, where possible.

STEP 6

Reevaluate the proposed action to determine first, if it is still practicable in light of its exposure to flood hazards, the extent to which it will aggravate the hazards to others, and it's potential to disrupt floodplain and wetland values; and second, if alternatives preliminarily rejected at step # 3 are practicable in light of the information gained in steps # 4 and # 5. FEMA shall not act in a floodplain or wetland unless it is the only practicable location (see 44 CFR 9.9).

Not applicable - Project is not located in a floodplain or in a wetland.

Applicable - Action proposed is located in the only practicable location, as described below:

The most practicable alternative is to repair/stabilize the facilities at the existing location and function as before.

Applicable - Action proposed is not located in the only practicable location. Describe below:

STEP 7

Prepare and provide the public with a finding and public explanation of any final decision that the floodplain or wetland is the only practicable alternative (see 44 CFR 9.12).

Not applicable - Project is not located in a floodplain or in a wetland.

Applicable - Finding is or will be prepared as described below:

A Cumulative Public Notice was published on October 27-31, 2008.

STEP 8

Review the implementation and post-implementation phases of the proposed action to ensure that the requirements of the order are fully implemented. Oversight responsibility shall be integrated into existing processes.

Not applicable - Project is not located in a floodplain or in a wetland.

Applicable - Approval conditioned on review of implementation and post-implementation phases to ensure compliance of the order(s).