

# **Record of Environmental Consideration**

**REVISED FOR FEMA ENVIRONMENTAL -- LOUISIANA**

See 44 Code of Federal Regulation Part 10

**Project Name/Number:** Consolidated Government Center

**Contributing PW's, Corresponding AIDB Entries, and Coordinates:**

Point A La Hache Old Jail - AIDB No. 1412 - PW No. 2900 – 29.27853/-89.79550  
Braithwaite Golf Cart Repair House - AIDB No. 1465 - PW No. 18539 – 29.85539/-89.91818  
Braithwaite Golf Course and Bridges - AIDB No. 1466 - PW No. 4524 – 29.85539/-89.91818  
District 1 Council Office - AIDB No. 1467 - PW No. 1865 – 29.57899/-89.79528  
Port Sulphur Playing Fields - AIDB No. 1468 - PW No. 2578 – 29.47811/-89.69675  
Braithwaite Golf Course Club House - AIDB No. 1469 - PW No. 3308 – 29.85539/-89.91818  
Lower Triumph Pump Station - AIDB No. 1470 - PW No. 18319 – 29.32664/-89.48145  
Channel Markers - AIDB No. 1519 - PW No. 16723 – 29.37638/-89.67638  
Channel Markers - AIDB No. 1520 - PW No. 16599 – 29.45921/-89.51801  
Boothville River Intake Structure - AIDB No. 1521 - PW No. 14754 – 29.35548/-89.43777  
Davant Community Center Storage Building - AIDB No. 1522 - PW No. 18428 – 29.61052/-89.86357  
Buras Old Fire Station - AIDB No. 1523 - PW No. 1919 – 29.35364/-89.52635  
Boat Harbor Storage Building - AIDB No. 1524 - PW No. 16661 – 29.56653/-89.76307  
Roads and Bridges - AIDB No. 1525 - PW No. 1694 – 29.24392/-89.36055

**Applicant Name:** Plaquemines Parish

**Project Location:** F. Edward Hebert Boulevard, Belle Chasse, LA 70037  
(Lat/Long: 29.896667/-89.979444)

**Project Description:** 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 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](http://www.fema.gov/plan/ehp/noma/index.shtm)

The Federal Emergency Management Agency (FEMA), Environmental and Historic Preservation Division (EHP) at the Louisiana Recovery Office has determined through its Special Considerations review that the applicant's public involvement process meets the requirements of NEPA and AA. Those requirements comply with the programmatic agreement between CEQ, DHS, and FEMA.

As part of the Greater New Orleans Area critical infrastructure, this project qualifies for expedited considerations under AA for NEPA compliance. The AA process ([www.fema.gov/plan/ehp/noma](http://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.

Hurricane Katrina caused extensive damage during the August 29, 2005 through November 1, 2005 incident period to the Pointe A La Hache Old Jail and others facilities listed above. The damaged facilities were determined by FEMA to be eligible for either repair or replacement and have been rendered safe and secure. The applicant has requested that available funds approved for either repair or replacement of the facilities be donated to the construction of the Plaquemines Parish Consolidated Government Center (Alternate Project).

The proposed Consolidated Government Center building (Center) is a part of a planned Consolidated Government Complex consisting of two additional office/operations buildings and two commercial center buildings. The planned complex will be constructed on parish-owned property, occupied by various abandoned buildings that once comprised the Belle Chasse Mental Health Facility. The Center is an approximate 144' x 80', elevated, two-story facility with an approximate footprint of 11,520 square feet and approximately 23,040 square feet of floor space. The Center would be constructed at the site of an existing abandoned building, which will be demolished. All existing buildings on the property are abandoned and will be demolished as the planned complex is developed. The Center consists of office space designated for various Parish government departments and, being elevated, it would be capable of continued operation during flooding events and capable of aiding communities within Plaquemines Parish during recovery from such events.

This document provides consideration of the proposed action to ensure compliance with applicable environmental laws and regulations. As needed, conditions may be required for the project, and these are presented at the end of this document.

**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 applicant, FEMA's Environmental and Historic Preservation Division and Alternatives Arrangement team have determined that Plaquemines Parish has provided sufficient documentation to demonstrate the completion of a satisfactory public involvement process related to the proposed actions.

**Correspondence/Consultation/References:** The attached NEPA Alternative Arrangements Report of Finding letter dated September 27, 2011, provides documentation that the proposed project has been subjected to a satisfactory public involvement process.

**Reviewer and Approvals**

**FEMA Environmental Reviewer:**

Name: Keith Whittinghill, Environmental Specialist, FEMA LRO

Signature Keith Whittinghill Date 9/28/2011

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

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

Signature LeSchina Holmes Date 09-28-2011

# 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 and amended on July 22, 2011 (Amended 2009 Statewide PA), Appendix C: Programmatic Allowances, Item I, Section A. - **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:** A review of this project was conducted in accordance with FEMA’s Programmatic Agreement dated August 17, 2009 and amended on July 22, 2011 (Amended 2009 Statewide PA), Appendix C: Programmatic Allowances, Item I, Section A. FEMA determined in a letter dated June 10, 2011 that No Historic Properties are affected by the proposed undertaking. SHPO concurrence with this determination was received on June 16, 2011. On June 10, 2011, consultation with affected tribes (Choctaw Nation of Oklahoma, Coushatta Tribe of Louisiana, Jena Band of Choctaw Indians, Mississippi Band of Choctaw Indians, Seminole Nation of Oklahoma, and Tunica-Biloxi Tribe of Louisiana) was conducted in accordance with the Programmatic Agreement dated August 17, 2009 and pursuant to 36 CFR §800.2(c)(2)(i)(B). The Jena Band of Choctaw Indians concurred with the determination in a letter dated June 22, 2011. FEMA has not received a response from the other Tribes within the timeframes in the PA and the Section 106 regulations and therefore may proceed with funding under the PA and 36 CFR §800.3(c)(4). The applicant must comply with the Louisiana Unmarked Human Burial Sites

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Preservation Act (R.S. 8:671 et seq.) and the Inadvertent Discovery Clause, which can be found under the Environmental Review NHPA conditions. Any change to the approved scope of work will require reevaluation under Section 106.

**Correspondence/Consultation/References:** Elizabeth Amisson, Historic Preservation Specialist

## B. Endangered Species Act

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

**(Review Concluded)**

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

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

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

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

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

Likely to adversely affect species or designated critical habitat

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

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

**Comments:** Construction of the proposed building would occur on previously disturbed ground at the site of a comparable sized existing building that will be demolished and removed. No listed species and/or designated critical habitat are present in areas affected directly or indirectly by the project. The project will have no effect on threatened or endangered species. No further consultation required.

**Correspondence/Consultation/References:** Keith Whittinghill, Environmental Specialist

## C. Coastal Barrier Resources Act

Project is not on or connected to CBRA Unit or Otherwise Protected Area **(Review Concluded)**.

Project is on or connected to CBRA Unit or Otherwise Protected Area. (FEMA determination/USFWS consultation on file)

Proposed action an exception under Section 3505.a.6 **(Review Concluded)**

Proposed action not excepted under Section 3505.a.6.

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

**Comments:** Project is not within a CBRA zone.

**Correspondence/Consultation/References:** Louisiana Coastal Barrier Resource System Map, referenced. Keith Whittinghill, Environmental 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:** No jurisdictional waters of the United States, including wetlands, would be impacted by the proposed project.

**Correspondence/Consultation/References:** National Wetlands Inventory, accessed via Google Earth, referenced. Keith Whittinghill, Environmental Specialist

## E. Coastal Zone Management Act

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- 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:** The proposed project is located within the Louisiana Coastal Management Zone. The applicant must check with the Louisiana Department of Natural Resources (LDNR) for permitting and other authorization requirements. The project may be coordinated by contacting LDNR at 1-800-267-4019.

**Correspondence/Consultation/References:** Louisiana Coastal Zone Map, referenced. Keith Whittinghill, Environmental 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 is located within a previously disturbed, developed area and would not physically encroach into streams, wetlands, or open water.

**Correspondence/Consultation/References:** National Wetlands Inventory, accessed via Google Earth, referenced. Keith Whittinghill, Environmental 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 demolition and construction activities that would produce a minor, temporary, and localized impact on air quality from fugitive dust particles. No long-term air quality impact is anticipated.

**Correspondence/Consultation/References:** Keith Whittinghill, Environmental 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 project site is in a previously disturbed, developed area and Farmland Protection Policy Act is precluded. No prime or unique farmland is present at the proposed project site..

**Correspondence/Consultation/References:** Google Earth imagery and area mapping, referenced. Keith Whittinghill, Environmental Specialist.

**I. Migratory Bird Treaty Act**

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- 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:** Project site is in a previously disturbed, developed 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, referenced. Keith Whittinghill, Environmental 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 would not affect any surface waters with the potential to affect EFH species.

**Correspondence/Consultation/References:** National Wetlands Inventory (USGS), accessed via Google Earth, referenced. Keith Whittinghill, Environmental 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.

**Correspondence/Consultation/References:** National Wild and Scenic Rivers, <http://www.nps.gov/rivers/wildriverslist.html>, referenced. Keith Whittinghill, Environmental Specialist

**L. Resource Conservation and Recovery Act**

Unusable equipment, debris and material shall be disposed 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 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 relevant local, state and federal agencies.

**M. Other Relevant Laws and Environmental Regulations**

None

## 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)**

Plaquemines Parish enrolled in the National Flood Insurance Program (NFIP), 05/01/85. As per Preliminary Digital Flood Insurance Rate Map (DFIRM) Panel Number 22075C0040 D, dated 10/30/08, the proposed project is located within a Zone "AE", EL 0 feet NAVD, with Base Flood Elevation (BFE) determined. This request is for an Alternate Project to apply funds from Project Worksheets (PW) 4524, 3308, 2900, 18539, 1865, 2579, 18319, 16723, 16599, 14754, 18428, 1919, 16661, and 1694, to the construction of a new Parish Complex, in Belle Chasse, LA. The applicant request that these funds will now be dedicated to the construction of the Plaquemines Parish Complex, rather than the individually listed projects. New construction must coordinate and comply with local floodplain ordinances, and be built to current codes and standards. The applicant is required to coordinate with the local floodplain administrator regarding floodplain permit(s) prior to the start of any activities. In compliance with EO11988, an 8-Step Process, showing considered alternatives, was completed and is attached or on file. 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 Preliminary (DFIRM) 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:* The project would not impact wetlands.

*Correspondence/Consultation/References:* National Wetlands Inventory (USGS), accessed via Google Earth, referenced.. Keith Whittinghill, Environmental 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 [add a reference] **(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:* No specific populations would be adversely impacted by this project. Demolition and construction activities would have temporary and limited local noise and air quality impacts.

*Correspondence/Consultation/References:* Keith Whittinghill, 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:* Keith Whittinghill, Environmental Specialist

### 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:

**This project must comply with all conditions of the attached Programmatic Categorical Exclusion. In addition, the following conditions apply as a condition of FEMA funding reimbursement:**

- Applicant is responsible to ensure potential hazardous materials, if any, shall be removed, handled, transported and disposed of in accordance with local, state and federal compliance requirements.
- 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 Louisiana Department of Environmental Quality (LDEQ) before work begins.
- If during the course of work, archaeological artifacts (prehistoric or historic) or human remains are discovered, the applicant shall stop work in the vicinity of the discovery and take all reasonable measures to avoid or minimize harm to the finds. The applicant shall inform their Public Assistance (PA) contacts at the Federal Emergency Management Agency (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 State Historic Preservation Officer.. In

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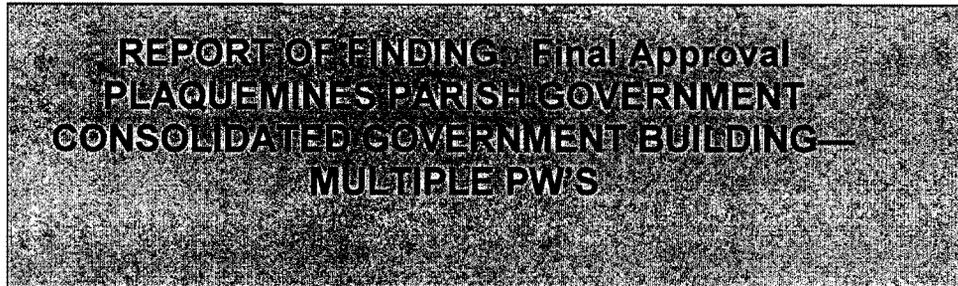
addition, if unmarked graves are present, compliance with the Louisiana Unmarked Human Burial Sites Preservation Act (R.S. 8:671 et seq.) is required. The applicant shall notify the law enforcement agency of the jurisdiction where the remains are located within twenty-four hours of the discovery. The applicant shall also notify FEMA and the Louisiana Division of Archaeology at 225-342-8170 within seventy-two hours of the discovery. If this scope of work and/or the footprint/location of the new building changes, this project will need to be resubmitted for further Section 106 review prior to ground disturbing activities taking place. Failure to comply with these stipulations may jeopardize receipt of federal funding.

- If required by the Louisiana Department of Environmental Quality (LDEQ), the applicant shall require its contractor to prepare, certify, and implement a Construction Storm Water Pollution Prevention Plan to prevent sediment and construction material transport from the project site. A Louisiana Pollution Discharge Elimination System 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.
- Applicant must check with Louisiana Department of Natural Resources (LDNR) for permitting or other authorization requirements. Projects may be coordinated by contacting LDNR at 1-800-267-4019.
- Regardless of the asbestos content, the applicant is responsible for ensuring that renovation or demolition activities are coordinated with the LDEQ in accordance with the LDEQ "Fifth Amended Declaration Of Emergency And Administrative Order" Dated March 31, 2006, and the LESHAP protocol dated March 1, 2006, incorporating the provisions of EPA'S National Emission Standards For Hazardous Air Pollutants (NESHAP) and the Louisiana Administrative Code (LAC) 33.III.5151 AND Chapter 27. SHOULD Asbestos Containing Materials (ACMS) be present at the project site, the applicant is also responsible for ensuring proper disposal in accordance with the previously referenced administrative orders. Documentation should be forwarded to GOHSEP or the Governor's Office of Homeland Security Emergency Preparedness and Federal Emergency Management Agency for inclusion in the permanent project files.
- The applicant is required to coordinate with the local floodplain administrator regarding floodplain permit(s) prior to the start of any activities. In compliance with EO11988, an 8-Step Process, was completed. 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 Preliminary DFIRM elevation.

## National Environmental Policy Act

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# Alternative Arrangements for NEPA Compliance



The Federal Emergency Management Agency (FEMA), Environmental and Historic Preservation (EHP) Division at the Louisiana Transitional Recovery Office has determined through its Special Considerations review that the public involvement process for the above-referenced Alternate and Improved Project for Plaquemines Parish Government (hereafter referred to as “the applicant”), 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. This finding is based in part on the applicant’s Public Involvement Plan submitted to FEMA with a request for expedited review and Alternative Arrangements for NEPA compliance.

**PROJECT:** On August 29, 2005, Hurricane Katrina made landfall in Plaquemines Parish, Louisiana. The proposed Consolidated Government Building (Center) is a part of the Consolidated Government Complex consisting of two additional office/operations buildings and two commercial center buildings. The planned complex will be constructed on parish-owned property, occupied by various abandoned buildings. All of the abandoned buildings will be demolished to make space for the new center. The Center would be used for office space designated for various Parish government departments and being elevated, would be capable of continued operations during flooding events and capable of aiding communities within Plaquemines Parish during recover from such events. **BACKGROUND:** As part of the Greater New Orleans Area critical infrastructure, this project qualifies for expedited considerations under the Alternative Arrangements for NEPA compliance. The Alternative Arrangements process ([www.fema.gov/plan/ehp/noma](http://www.fema.gov/plan/ehp/noma)) has been implemented to address the basic elements of NEPA for actions taken to restore critical infrastructure devastated by Hurricane Katrina.

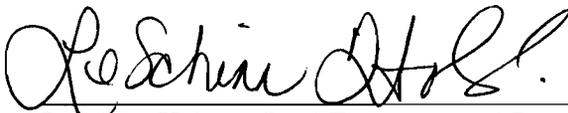
**PUBLIC INVOLVEMENT:** Applicants wishing to utilize Alternative Arrangements are required to follow a public involvement plan and to obtain public input regarding the proposed project. Plaquemines Parish Government submitted a Public Involvement Plan for its government buildings on October 28, 2008. The PIP included all parish government buildings. That PIP suffices as adequate public involvement for this project.

### **ANALYSIS of PUBLIC INVOLVMENT for this project:**

1. Plaquemines Parish Government is responsible for public involvement for this project.
2. Plaquemines Parish Government, in cooperation with Federal, state, and local agencies and other stakeholders, has demonstrated meaningful public involvement with regards to the proposed projects.
3. The Applicant solicited bids from qualified architecture and engineering firms. Information regarding the advertisement and responses is on file with the Applicant.

**FINDING:**

- A. Documentation Sufficient** Based on documentation provided by the applicant, FEMA's review has determined that Plaquemines Parish Government has conducted a satisfactory process of public involvement and outreach in its project development and is otherwise eligible for consideration under Alternative Arrangements for NEPA compliance. Plaquemines Parish Government is responsible for archiving public involvement materials relative to the projects listed above. This material will be available at close-out for authentication and such documentation will be made available to the close-out reviewer if requested.
- B. Final Approval** Plaquemines Parish Government has been responsive to requests for information about the above-referenced project. In light of the satisfactory completion of public involvement processes identified above, and submission of sufficient documentation concerning the local planning process, The Environmental/Historic Preservation Staff of the FEMA Louisiana Transitional Recovery Office has determined that the applicant has sufficiently complied with the requirements for Alternative Arrangements as outlined in FR Vol. 71, No. 56, Page 14712, March 23, 2006.



9/27/2011

LeSchina Holmes, Lead Environmental Protection Specialist  
FEMA, Louisiana Recovery Office

Prepared by Cynthia Illick (CTR)  
Alternative Arrangements project manager