

ABBREVIATED RECORD OF ENVIRONMENTAL CONSIDERATION

See 44 Code of Federal Regulation Part 10.

Project Name/Number: Westbank Firing Range/PW# 6299 Version 1

Project Location: 1801 Westbank Expressway, Harvey, Louisiana, 70058, Orleans Parish,
Latitude: 29.90501, Longitude: -90.07019

Project Description:

Hurricane Katrina made landfall on August 29, 2005, with hurricane force winds and heavy rain, causing extensive damage to the Westbank Firing Range and Academy. Damages to the exterior of the building include: collapse of 60' x 215' elevated roof system onto structural roof, deformation of the remaining portion of the standing seam roof deck, collapse of 275 LF x 12 FT painted metal Fascia, roof hatch destroyed, 20' x 20' area of painted masonry wall scrapped by dangling metal, 10' x 20' of soffit was destroyed, 50 LF of painted metal box gutter twisted out of shape, two parking lot lights broke off from poles, 740 LF chain link fence with slats and 26 ft gate blown over, fence access control operator, 6' x 6' swing gate damaged, 292 LF of three strand barbed wire fence damaged, 250 LF of chain link fence with slats bent over, 55 LF of 8' tall wood fence blown over. Damages to the interior of the building include: 600 LF x 12' of drywall, wood shelving, VCT flooring, carpeting, suspended ceiling tiles and insulation. Mechanical damages include damages to: interior ductwork, roof vents, rotating chimney caps, and boiler flue vent. Electrical damages include damage to: exterior security dome camera, cabling and computer monitor, five interior security cameras, interior projector and interior electrical lighting controls over shooting range. Damaged contents include: 3,000 cardboard shooting targets and 25 SWAT helmet liners.

The Westbank Firing Range and Academy facility is a 208' x 525' x 26' tall brick building with a standing seam metal panel elevated roof built 12' above the structural steel joist roof. The attached Hazard Mitigation Proposal seeks to mitigate wind damage to the single slope roof system. Proposal measures include altering the single slope roof into a hip roof thereby increasing the wind capacity from 135 to 150 mph.

Documentation Requirements

- (Short version) All consultation and agreements implemented to comply with the National Historic Preservation Act, Endangered Species Act, and Executive Orders 11988, 11990 and 12898 are completed and no other laws apply. **(Review Concluded)**
- (Long version) All applicable laws and executive orders were reviewed. Additional information for compliance is attached to this REC and/or included in project files, as applicable.

National Environmental Policy Act (NEPA) Determination

- Statutorily excluded from NEPA review. **(Review Concluded)**
- Programmatic Categorical Exclusion - **(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**)
- Environmental Assessment
- Supplemental Environmental Assessment (Reference EA or PEA in comments)
- Environmental Impact Statement

Comments: The scope of work for this project meets the criteria for an Alternative Arrangement 'Government and Court Administration Buildings' type of project. Any changes to the scope of work will require resubmission to, and evaluation and approval by, the state and FEMA prior to initiation of any work, for compliance with the National Environmental Policy Act.

HISTORIC BUILDINGS AND STRUCTURES

- No historic properties that are listed or 45/50 years or older in project area. (**Review Concluded**)
- Building or structure listed or 45/50 years or older in 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**)

Comments: The structure does not meet the 45-year criterion, nor does it possess the level of exceptional importance required by Criterion G of the National Register guidelines to be considered eligible for the National Register of Historic Place. Therefore, the proposed work will have no effect on historic properties.

Correspondence/Consultation/References:
James Crouch, Historic Preservation Specialist

ARCHEOLOGICAL RESOURCES

- Project affects only previously disturbed ground. (**Review Concluded**)
- Project affects undisturbed ground.
 - Project area has no potential for presence of archeological resources
 - Determination of no historic properties affected (FEMA finding/SHPO/THPO concurrence or consultation 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: This scope of work had been reviewed and meets the criteria in Appendix A, Programmatic Allowances (PA), Items I-E (Fence replacement) in accordance with the PA, dated December 3, 2004. No known archaeological sites or historic properties will be affected by this undertaking. All ground disturbing activities being performed in previously disturbed or archaeologically surveyed areas do not require Section 106 review. This determination could change should new information come to the Louisiana SHPO's Office. Any change to the approved scope of work will require resubmission for re-evaluation under Section 106.

Correspondence/Consultation/References: Kathleen Bergeron, Historic Preservation Specialist

THREATENED AND ENDANGERED SPECIES

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 letter dated September 15, 2005.

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)**

Comments: The site is located in Zone "X", area protected from the one percent annual change (100 year) flood by levee, dike or other structures subject to possible failure or overtopping during large floods.

Correspondence/Consultation/References: FEMA Flood Insurance Rate Map, Community Panel No. 22051C 0135 E, revised 03/23/1995.

E.O. 11990 – WETLANDS

- No Effects on Wetland(s) and 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: No wetlands were observed during site visit or determined to be present by checking the USFWS National Wetlands Inventory (NWI) maps.

Correspondence/Consultation/References:
USFWS NWI map accessed on-line (<http://wetlandsfws.er.usgs.gov/wtlnds/launch.html>) 10/02/2006.

E.O. 12898 - Environmental Justice For Low Income and Minority Populations

- No Low income or minority population in, near or affected by the project - **(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 70058 are: 51% African American, 39.4% White and 5.6% Asian. The median household income in 1999 was \$ 36,824 and 16.9 % of families are below poverty level.

Correspondence/Consultation/References: U.S. Census bureau 2000 data at <http://factfinder.census.gov>, referenced 10/02/2006.

OTHER RELEVANT LAWS AND ENVIRONMENTAL REGULATIONS

- No impacts to other substantive laws/Executive Orders identified. Review concluded.
 Other applicable substantive laws/Executive Orders. (Identify law/E.O. and conditions if any below).

Comments:

State Hazardous Materials and Solid Waste Laws: 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 and/or toxic waste in accordance to the requirements and to the satisfaction of the governing local, state and federal agencies.

Correspondence/Consultation/Reference: N/A

V. ENVIRONMENTAL REVIEW PROJECT CONDITIONS

Project Conditions:

- This project is located within the Louisiana Coastal Management Zone. FEMA has determined that this project is consistent with the Coastal Zone Management Act and the Louisiana Coastal Management Plan (LCMP). Any change to the approved scope of work will require re-submission to FEMA for re-evaluation for consistency with LCMP. Projects within the Coastal Zone may still require a Coastal Use Permit from the Louisiana Department of Natural Resources (LDNR). Projects may be coordinated by contacting LDNR at 1-800-267-4019.
- This project involves the demolition or renovation of a public structure. Regardless of the asbestos content, the applicant is responsible for ensuring that renovation or demolition activities are coordinated with the Louisiana Department of Environmental Quality (LDEQ) in accordance with the LDEQ "Seventh Amended Declaration of Emergency and Administrative Order" dated August 24, 2006, and the Louisiana Emission Standards for Hazardous Air Pollutants (LESHAP) protocol dated March 1, 2006, incorporating the provisions of the Environmental Protection Agency's (EPA) 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.
- 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 and/or toxic waste in accordance to the requirements and to the satisfaction of the governing local, state and federal agencies.
- In accordance with the Formosan Termite Initiative Act, (LA R.S. 3:3391.1 through 3391.13) the Louisiana Parish of Jefferson is under quarantine. The movement of wood or cellulose material, temporary housing or architectural components (e.g. beams, doors and other wood salvage from a structure) may not leave the quarantined parishes without written authorization from the commissioner of the Louisiana Department of Agriculture and Forestry or his designee(s).
- Building materials and furnishings that are contaminated with mold growth and are not salvageable should be double-bagged using 6-mil polyethylene sheeting. These materials can then usually be discarded as ordinary construction waste. It is important to package mold-contaminated materials in sealed bags before removal from the contaminated area to minimize the dispersion of mold spores throughout the building. Large items that have heavy mold growth should be covered with polyethylene sheeting and sealed with duct tape before they are removed from the contaminated area.
- This project involves the demolition or renovation of a public structure that may contain surfaces coated with lead-based paint (LBP). Activities involving abrading (sanding, scraping, etc.), heating stripping or otherwise concentrating the LBP shall comply with applicable provisions of 29 CFR Parts 1910 and 1926 (OSHA – Worker Safety), and 40 CFR Part 260 through 268 (EPA – Hazardous Waste). The applicant is responsible for ensuring that renovation or demolition activities are coordinated with the Louisiana Department of Environmental Quality for abatement activities and is also responsible for ensuring proper disposal in accordance with the previously referenced regulations.
- Jefferson Parish is enrolled in the National Flood Insurance Program (NFIP), as of 10/01/71. As per Flood Insurance Rate Map (FIRM) panel number 22051C 0135 E, dated 03/23/95, site is located

within an "X" Zone, this area protected from the one percent annual change (100 year) flood by levee, dike or other structures subject to possible failure or overtopping during larger floods. Project is structure repair to pre-disaster footprint. Per 44 CFR 9.11 (D)(9), all building contents, materials and equipment components shall be either flood proofed or elevated above flood of record to the extent possible and practicable to or above Advisory Base Flood Elevations (ABFE) per the February 6, 2006 memorandum. Applicant shall coordinate with the local Floodplain Administrator for floodplain ordinances and the local codes & standards requirements. Applicant is responsible for meeting all requirements of the permit(s). The proposed facility repair is to be elevated to or above the Advisory Base Flood Elevations per the February 6, 2006 memorandum.

No extraordinary circumstances as described in 44 CFR 10.8(d)(3) were identified during project review.

REVIEWER AND APPROVALS

FEMA Environmental Reviewer.

Name: Karyn Harrison

Signature Karyn Harrison . Date 10/20/2006

FEMA Regional Environmental Officer or delegated approving official.

Name: William Fagan, Deputy Environmental Liaison Officer

Signature W Fagan . Date 10/23/2006