

# ABBREVIATED RECORD OF ENVIRONMENTAL CONSIDERATION

See 44 Code of Federal Regulation Part 10.

**Project Name/Number:** Delgado Community College-Bldg. #07 (Resource Center/Moss Library)/ PW# 14304

**Project Location:** 615 City Park Avenue, New Orleans, Louisiana, 70119, Orleans Parish, Latitude: 29.98643, Longitude: -90.10526

## **Project Description:**

On August 29, 2005, Hurricane Katrina and subsequent flooding due to level failures caused damage to the Resource Center/Moss Library (Bldg. #07) at Delgado Community College. The single story, concrete masonry unit (CMU), steel framed structure with a built up asphalt shingle roof constructed in 1963 sustained extensive damage. The building sustained flood and wind damage which will require repair or replacement of: flooring throughout facility including vinyl tile, terrazzo tile, ceramic tile, smooth finish concrete, and commercial carpet, base cove molding/base board, chair rail, rubber stair treads, staining of exterior brick veneer and storefront glazing, interior CMU walls, drywall, painted plywood paneling, electrical and mechanical systems, acoustical ceiling tiles, suspended ceiling tiles, doors and door frames, fluorescent lights, multiple stage and elevated floor areas, wood cabinetry, book shelves, 5 ton A/C compressor, satellite antenna (on 20 ft mast pole) and extensive mold growth due to extended exposure to stagnant flood water. The facility was in use prior to the disaster.

Hazard Mitigation proposes to mitigate future flood damage to the A/C unit (previously located on grade) by raising the unit and it's electrical disconnect to approximately 4' (one foot above the experienced flood elevation).. The mitigation scope of work includes constructing a 4' x 4' x 2' reinforced concrete slab foundation, installing four 6" vertical steel pipe support columns with base and cap flanges, field fabricating a 6" structural steel channel frame with cross braces on top to mount and support the unit.

## **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 'Permanent Schools' 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 50-year criterion, nor does it possess the level of exceptional importance required by Criteria G of the National Register Guidelines to be considered eligible for the National Register of Historic Places. Therefore, the proposed work will have no effect on standing historic properties. Scope of work indicates ground disturbing activities associated with the enlargement of the concrete slab. Upon consultation of data provided by the State Historic Preservation Officer (SHPO), there are no known archeological sites within .25 miles of the project area and all work will occur within a previously disturbed area. Building is not 45 years or older, circa 1963 construction, therefore, this project does not have the potential to cause effects on historic resources. In accordance with the PA, all ground disturbing activities being performed in previously disturbed or archeologically surveyed areas do not require Section 106. Any change to the approved scope of work will require resubmission for re-evaluation under Section 106.

**Correspondence/Consultation/References:**

NHPA effect determinations made by Kathleen Bergeron , FEMA 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:**

Scope of work indicates ground disturbing activities associated with the enlargement of the concrete slab. Upon consultation of data provided by the State Historic Preservation Officer (SHPO), there are no known archeological sites within .25 miles of the project area and all work will occur within a previously disturbed area. In accordance with the PA, all ground disturbing activities being preformed in previously disturbed or archeologically surveyed areas do not require Section 106. Any change to the approved scope of work will require resubmission for re-evaluation under Section 106.

**Correspondence/Consultation/References:** Kathleen Bergeron , FEMA 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 “B”, area protected from 100-yr flood by levee, dike or other structure.

**Correspondence/Consultation/References:** FEMA Flood Insurance Rate Map, Community Panel No. 2252030095E, revised 03/01/1984.

**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>) 11/08/2006.

**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 70119 are: 72.1% African American, 23.3% Caucasian and 5.6% Hispanic. The median household income in 1999 was \$ 21,297 and 29.2 % of families are below poverty level.

**Correspondence/Consultation/References:** U.S. Census bureau 2000 data at <http://factfinder.census.gov>, referenced 11/08/2006.

**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:***

**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 and/or toxic waste in accordance to the requirements and to the satisfaction of the governing local, state and federal agencies.

***Correspondence/Consultation/Reference:***

**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.
- Ensure that if damaged AC unit contains refrigerant that is an ozone depleting substance subject to Clean Air Act requirements, that this refrigerant is removed and recovered by Certified Chlorofluorocarbon (CFC) technician per 40 CFR Part 82, and that documentation of appropriate disposal is obtained.
- In accordance with the Formosan Termite Initiative Act, (LA R.S. 3:3391.1 through 3391.13) the Louisiana Parishes of Calcasieu, Cameron, Jefferson Davis, Orleans, Jefferson, Plaquemines, St. Bernard, St. Charles, St. John the Baptist, St. Tammany, Tangipahoa, and Washington are 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.

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 11/13/2006 .

FEMA Regional Environmental Officer or delegated approving official.

Name: William Fagan

Signature WFagan . Date 11/15/2006 .