

# **ABBREVIATED RECORD OF ENVIRONMENTAL CONSIDERATION**

See 44 Code of Federal Regulation Part 10.

**Project Name/Number:** Arthur Monday Multi-Service Center/ PW 15520/ FIPS # 071-55000-00

**Project Location:** 1111 Newton St., New Orleans, Orleans Parish, Louisiana 70114, Latitude: 29.94523, Longitude: -90.0445

**Project Description:** High winds and rain from Hurricane Katrina caused considerable roof and interior damage to Arthur Monday Multi-Service Center. The scope of work is to restore the building to its pre-disaster condition and includes consulting services, construction repairs, replacement of damaged equipment, and a Hazard Mitigation Proposal. The mitigation proposal substitutes an EPDM roofing system with hurricane clip anchors in lieu of the 4-ply built-up roofing system currently on the building.

## **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:** This project meets the definition of critical infrastructure (hospitals and health care facilities) under the Alternative Arrangements for NEPA compliance.

## **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 facility was built in 1977.

**Correspondence/Consultation/References:** Email correspondence with John Ehman, Project Officer dated 2/17/2007.

### **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:**

**Correspondence/Consultation/References:** Damage description and scope of work from Project Worksheet 15520

### **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:**

**Correspondence/Consultation/References:** Endangered Species Summary for USFWS consultation, letter to Don Fairley dated September 15, 2007

**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 city of New Orleans / Orleans Parish enrolled in the National Flood Insurance Program (NFIP) on 08/03/1970. Per Flood Insurance Rate Map (FIRM) panel number 2252030160 E, dated 03/01/1984, project is located in zone "B", area protected from 100-yr flood by levee, dike, or other structure subject to failure or overtopping during larger floods. Project is to repair facility / building to pre-disaster footprint which is not likely to affect any floodplain.

**Correspondence/Consultation/References:** FEMA Flood Insurance Rate Map, Community Panel No. 2252030160 E, dated 03/01/1984, A. C. Clark, CFM, floodplain

**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:**

**Correspondence/Consultation/References:** USFWS NWI map accessed on-line (<http://wetlandsfws.er.usgs.gov/wtlnds/launch.html>) referenced February 14, 2007.

### **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 70114 are: 73.6 % African American, 21.8 % Caucasian and 4.3 % Hispanic, 35.3 % of individuals are below poverty level.

**Correspondence/Consultation/References:** U.S. Census bureau 2000 data at <http://factfinder.census.gov>, referenced February 14, 2007.

### **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 (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.

***Formosan Termite Initiative Act***

In accordance with the Formosan Termite Initiative Act, (LA R.S. 3:3391.1 thru 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 salvaged 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).

***Clean Air Act***

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 "Eighth Amended Declaration of Emergency and Administrative Order" dated January 19, 2007, incorporating the provisions of the Environmental Protection Agency's (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 order.

**Correspondence/Consultation/Reference:** Damage description and scope of work from Project Worksheet 15520

### **V. ENVIRONMENTAL REVIEW PROJECT CONDITIONS**

## Project Conditions:

1. 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.
2. In accordance with the Formosan Termite Initiative Act, (LA R.S. 3:3391.1 thru 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 salvaged 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).
3. 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 "Eighth Amended Declaration of Emergency and Administrative Order" dated January 19, 2007, incorporating the provisions of the Environmental Protection Agency's (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 order.
4. In order to comply with the NEPA process, and because of the potential for this project to have an adverse impact on the environment, including the social and economic environments, prior to initiating the project, the applicant must prepare a public involvement plan and conduct a public involvement process. FEMA's Environmental and Historic Preservation (EHP) staff can provide guidance to determine how much and what type of public involvement is appropriate for a given project. If needed, the public outreach group can assist you in designing and implementing a public involvement program. Copies of any articles, public notices, meeting minutes, and public comments should be provided to FEMA to become part of the project record.

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

## REVIEWER AND APPROVALS

FEMA Environmental Reviewer.

Name: Nicole Poret

Signature Nicole Poret Date 2/20/2007

FEMA Regional Environmental Officer or delegated approving official.

Name: Bridget Zachary

Signature [Signature] Date 2-20-07