

Record of Environmental Consideration

See 44 Code of Federal Regulation Part 10

Project Name/Number: Langston Hughes School/ OR-413/PW 15708

Project Location: 3519 Trafalgar Street, New Orleans, LA 70119, Orleans Parish

Project Description: The proposed project is located on the campus of Langston Hughes Elementary School at 3519 Trafalgar Street in New Orleans, Louisiana. The site is located approximately one-half mile south of Interstate 610 (I-610). The site is bordered on the north by a residential area and Desaix Boulevard, on the east by a residential area and Gentilly Boulevard, and on the south and on the west by a residential area that is adjacent to the Fair Grounds Race Course. The school campus is accessed from Trafalgar Street and consists of approximately 2 acres of land which contains two large play areas to the southwest and to the northeast of the school and a basketball court. At the time of the site visit on July 11, 2007, the existing school had been demolished. The temporary school will be placed at the site of the old building.

The proposed project is to install 72 12'x 68' modular units and associated parking facilities on the empty lot of the old Langston Hughes Elementary to be used temporarily as schools. The units will be placed to the southwest of where the school once stood. The total area of the project will be 49,832 square feet and will accommodate approximately 600 K-8th Grade students. Associated activities will include site preparation, such as grading, the installation of driveways, concrete sidewalks, ADA ramps, parking lots, and the installation of below ground utilities. The parking lot will be placed to the northeast of the modular units and will connect to Trafalgar Street. The driveway will also connect to Trafalgar Street and it will be located in the front of the modular units. At least one walkway from each building will be covered creating a network of covered walkways. The site preparation will include the preparation of beds sufficient enough to support the weight of the modular units. These beds will be prepared by removing the unsuitable material and replacing it with limestone. Once constructed, the net load bed elevation shall be approximately the same as the original grade elevation of the site. Fill will not be placed on the site to raise the elevation of the site. The modular units placed on the site will be elevated to ABFE by utilizing blocks. It is anticipated that these units will be used for 3-5 years, after which time the site will be returned to its pre-disaster conditions.

This Record of Environmental Consideration is based upon the scope of work in the project description provided above. **If any changes occur to the scope of work for this project, FEMA Environmental shall be notified immediately to re-evaluate the project for compliance with NEPA and other Laws and Executive Orders.**

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

Programmatic Categorical Exclusion (**Review Concluded**)

Comments: Project is consistent with the Programmatic Categorical Exclusion (PCE) for Group Temporary Emergency Housing, signed October 21, 2005.

Reviewer and Approvals

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

FEMA Environmental Reviewer:

Name: Kimberly R. Rogers, Floodplain Management Specialist, FEMA Region VI – Temporary Housing

Signature Kimberly R. Rogers Date 7-23-07

FEMA Regional Environmental Officer or Delegated Approving Official:

Name: Howard R. Bush, ELO, FEMA, DR 1603/1607

Signature [Signature] Date 7-24-07

I. Compliance Review for Environmental Laws (other than NEPA)

A. National Historic Preservation Act (NHPA)

- Not type of activity with potential to affect historic properties.
- Activity meets Programmatic Agreement, December 3, 2004. Appendix A: Allowance No. I.G.
Are project conditions required? Yes (see Section V) No
- Programmatic Agreement not applicable, must conduct standard Section 106 Review.

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**)

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: Proposed project meets Programmatic Agreement, December 3, 2004, Appendix A: Allowance I.G. Requirements of Section 106 of the National Historic Preservation Act are satisfied. Richard Rose, Secretary of the Interior Standards for Archaeology and Historic Preservation qualified investigator, November 1, 2006.

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: Field observations during site visits on 08/02/2006 and 07/19/2007.

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 09/18/2006.

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/or Section 9/10 (Rivers and Harbors Act) permit, including qualification under Nationwide Permits.
Are project conditions required? YES (see Section V) NO (**Review Concluded**)

Comments: No jurisdictional waters of the U.S., including wetlands, occur in or near the project area.

Correspondence/Consultation/References: Site visits conducted on 08/02/2006 and 07/19/2007. USFWS National Wetlands Inventory map (<http://www.fws.gov/nwi/>) queried on 09/18/2006.

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: Proposed site occurs on previously disturbed land and does not require a Louisiana Department of Natural Resources (LDNR) Coastal Management Division Joint Permit.
Correspondence/Consultation/References: LDNR Coastal Management Division emergency consultation guidance and provisions in letter dated March 13, 2006.

F. Fish and Wildlife Coordination Act

- Project does not affect, control, or modify a waterway/body of water. (**Review Concluded**)
- Project affects, modifies or controls 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: No streams or water bodies are located in or near the project area.
Correspondence/Consultation/References: Site visits conducted on 08/02/2006 and 07/19/2007.

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 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 Resource Conservation Commission 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 developed urbanized area and FPPA is precluded.
Correspondence/Consultation/References: Consultation with Jerry Daigle, NRCS, memo to the file, January 24, 2006, for FEMA temporary housing actions.

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: Field observations during site visits on 08/02/2006 and 07/19/2007.

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: No wild and scenic rivers affected.

Correspondence/Consultation/References: National Wild and Scenic Rivers <http://www.nps.gov/rivers/wildriverslist.html>.

L. 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)**

Comments: The site is located in Zone A1. Per the 8-Step Planning Process, there are limited practicable alternatives to siting temporary facilities in the floodplain in Orleans Parish. The ability to locate sites outside the floodplain is limited because much of the region is floodplain and there is a heavy demand for temporary housing/facilities assistance close to the impact area. Final notice was published with a 3-day comment period starting on October 15-17, 2005, in the *Times Picayune* and October 18-20, 2005, in the *Baton Rouge Advocate*.

Correspondence/Consultation/References: FEMA Flood Insurance Rate Map, Community Panel No. 225203 0095E, revised March 1, 1984.

B. 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 08/03/2006. Field observation from 08/02/2006 site visit.

C. 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 are: 72.1% African American, 23.3% White and 5.6% Hispanic or Latino. The median household income in 1999 was \$ 21,297 and 32.8 % of families are below poverty level.

Correspondence/Consultation/References: U.S. Census bureau 2000 data at <http://factfinder.census.gov>, referenced 08/03/2006.

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).

Hazardous Materials and Toxic Wastes

Comments: No hazardous materials were observed at the time of the site visit. The site did not appear on any of the environmental databases searched. The site did not appear on the EPA Brownfield list or on the Louisiana Volunteer Remediation Program list. Louisiana Department of Environmental Quality (DEQ) research showed records pertaining to asbestos, agency interest #99015. All of the files were related to asbestos inspections and removal inside the school building. There are no oil/gas wells or oil/gas fields at the site or in the immediate vicinity of the site. EPA sediment sampling was conducted at a site approximately 0.25 miles away and the results showed elevated levels of acetone, arsenic, cadmium, chromium, dieldrin, diesel range organics, petroleum hydrocarbons, and zinc. Historic Sanborn maps from 1929-1940 and 1937-1951 indicate that the proposed site was vacant.

Additional consultations were conducted between FEMA and the EPA in June 2007 regarding the potential for locating chemical contaminants on the proposed site. The EPA responded in an email dated June 22, 2007 indicating that because the site has not been tested nor has the agency reviewed any previous data, the EPA recommends that samples be taken at the proposed location of the temporary classrooms; and that the EPA-ATSDR would provide advice on sampling strategies. Refer to attached review and consideration presented by the EPA.

Correspondence/Consultation/References: Environmental FirstSearch Report, July 29, 2006. Louisiana Voluntary Remediation Program (VRP) list. EPA Brownfield properties list. Louisiana Department of Natural Resources (DNR) SONRIS Oil/Gas Data – http://sonris-www.dnr.state.la.us/www_root/sonris_portal_1.htm. EPA Sediment Sampling data – <http://www.epa.gov/enviro/katrina/emkatrina.html>. Historic Sanborn maps from the Louisiana State Library databases –

<http://www.state.lib.la.us/>. Hazmat review and final health and safety determinations made by Laurel Rohrer, FEMA Hazmat Specialist (URS).

IV. Extraordinary Circumstances

Based on the review of compliance with other environmental laws and Executive Orders, and in consideration of other environmental factors, review the project for extraordinary circumstances.

* A "Yes" under any circumstance may require an Environmental Assessment (EA) with the exception of (ii) which should be applied in conjunction with controversy on an environmental issue. If the circumstance can be mitigated, please explain in comments. If no, leave blank.

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: None

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:

- This site is located in the floodplain and must accordingly comply with the minimum requirements of the National Flood Insurance Program as outlined in 44 CFR Part 60. Coordination must be done with the parish floodplain administrator to ensure compliance with the NFIP as administered in the local floodplain ordinance, which may be more stringent than the NFIP's minimum requirements, including issuance of appropriate permitting.

- Per 44 CFR 9.11(d)(8) minimization standards, existing flood warning, and preparedness plans should be amended in consideration of the proposed action to minimize the effect of floods on human health, safety and welfare. This includes giving special consideration to unique hazard potential such as rapid-rise from a future flash flood. An evacuation plan that includes written evacuation procedures for the temporary housing site occupants must be prepared, posted and made available to them.
- Per 44CFR9.11(d)(8), particularly if this facility is to be used for a critical purpose (fire/medical/EOC), applicant must implement public safety minimization standards. Existing flood warning and preparedness/evacuation plans should be amended in consideration of the proposed action to minimize the effect of floods on human health, safety and welfare, as appropriate. This includes giving special consideration to unique hazard potential such as rapid-rise from a future flash flood.
- In order to convey stormwater runoff, the contractor will be required to design drainage features so that flows will not cause nuisance flooding on the site or to surrounding properties during significant rain events. The drainage system will be required to meet local and parish requirements, including the acquisition of easements, if applicable. All permit conditions will be incorporated into the project design and implementation.
- Use of best management practices (e.g., installation of silt fences and straw bales) would be required to reduce soil erosion and sedimentation. If fill is stored on site, the contractor would be required to appropriately cover it to prevent erosion.
- If any hazardous materials are found during construction or occupation, all hazardous materials shall be remediated, abated, or disposed of as appropriate, and otherwise handled in accordance with applicable local, state, and federal laws and regulations.
- In accordance with the National Historic Preservation Act, if unanticipated historic or cultural materials are discovered during construction, all construction activities shall immediately cease within 100 feet of the materials until their cultural affiliation and ultimate disposition are determined in consultation with the Louisiana State Historic Preservation Office, FEMA Environmental Liaison Officer and other interested parties.
- Any debris located on the project site would be removed and disposed of by the construction contractor prior to occupancy.
- If any changes occur to the approved scope of work for this project, FEMA Environmental shall be notified immediately to re-evaluate the project for compliance with NEPA and other Laws and Executive Orders.

**Executive Order 11988 Floodplain Management
 Executive Order 11990 Wetland Protection
 Eight-Step Planning Process Summary
 FEMA-1603/1607-DR-LA: Placement of Emergency Housing Sites in 100-year Floodplain
 of Orleans Parish for Langston Hughes Elementary**

<p>Step 1: Determine whether the Proposed Action is located in a wetland and/or the 100-year floodplain, or whether it has the potential to affect or be affected by a floodplain or wetland.</p>	<p>Project Analysis: Much of Orleans Parish is in the floodplain. The Proposed Action does not involve E.O 11990 policy regarding wetlands.</p>
<p>Step 2: Notify public at 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.</p>	<p>Project Analysis: Initial Public Notice in the Baton Rouge Advocate, November 9, 2005. The notice indicated that actions would potentially occur in the 100-year floodplain.</p>
<p>Step 3: Identify and evaluate practicable alternatives to locating the Proposed Action in a floodplain or wetland.</p>	<p>Project Analysis: The following alternates were evaluated:</p> <p>Alternative 1: No Action</p> <p>Alternative 2: Proposed Action. Locate emergency temporary housing/facilities in the floodplain of Orleans Parish</p> <p>Dismissed Alternatives: Relocated flood displaced parish residents to other parishes that have areas beyond the floodplain</p>
<p>Step 4: Identify the full range of 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.</p>	<p>Project Analysis: The <u>No Action alternative</u> would entail no construction or preparation of a site for temporary emergency educational facilities nor would it allow the federal government to adequately address the urgency for providing emergency temporary housing facilities to Orleans Parish. Consequently, residents of this parish would have to relocate to areas distance from their places of employment, schools, and communities. The No Action alternative would forego disaster assistance and would not be acceptable to the local community or local interests. Flood victims would continue to suffer stresses related to disaster displacement.</p> <p><u>Alternative 2, the Proposed Action.</u> As a temporary and reversible action it would not result in any impacts associated with the occupancy or modification of the floodplain. The construction of temporary emergency housing facilities would not affect the floodplain. An emergency evacuation plan would be developed as a condition of use. The Proposed Action does not involve E.O 11990 policy regarding wetlands.</p>

<p>Step 5: Minimize the potential adverse impacts to work within floodplains and wetlands to be identified under Step 4, restore and preserve the natural and beneficial values served by wetlands.</p>	<p>Projects Analysis: The temporary emergency housing facilities will be implemented per 44 CFR Section 60.3[c] [14] for manufactured homes and per 44 CFR Section 60.3[c] [6] for recreational vehicles (travel trailers). The Proposed Action does not involve E.O 11990 policy regarding wetlands.</p>
<p>Step 6: Re-evaluate the Proposed Action to determine 1) if it is still practicable in light of its exposure to flood hazards; 2) the extent to which it will aggravate the hazards to others; and 3) its potential to disrupt floodplain and wetland values.</p>	<p>Project Analysis: The Proposed Action remains practicable based on the temporary nature of the project.</p>
<p>Step 7: If the agency decides to take an action in a floodplain or wetland, prepare and provide the public with a finding and explanation of any final decision that the floodplain or wetland is the only practicable alternative. The explanation should include any relevant factors considered in the decision-making process.</p>	<p>Project Analysis: A public notice has been made based on the decision to proceed with the Proposed Action. This notice stated a reason for locating the Proposed Action in the floodplain; a description of all significant facts considered; a statement indicating whether the action conforms to state and local floodplain protection standards; and a statement indicating how the action affects the floodplain and how mitigation will be achieved. The notice will allow the public a chance to comment. The public notices were advertised in the Baton Rouge Advocate beginning on October 18, 2005; Times Picayune beginning on October 17, 2005. All public notices had a public comment period of 72 hours.</p>
<p>Step 8: Review the implementation and post-implementation phases of the Proposed Action to ensure that the requirements of the Executive Orders are fully implemented. Oversight responsibility shall be integrated into existing processes.</p>	<p>Project Analysis: This step is integrated into the NEPA process and FEMA project management and oversight functions.</p>