

ABBREVIATED RECORD OF ENVIRONMENTAL CONSIDERATION

See 44 Code of Federal Regulation Part 10.

Project Name/Number: EOR0178 Library / PW #: 5649

Project Location: 6400 Press Drive, New Orleans, Louisiana, Orleans Parish, Latitude: 30.02642, Longitude: -90.04469

Project Description: On August 29, 2005, as a direct result of Hurricane Katrina high winds, wind driven rain and debris, and subsequent widespread flooding caused by storm surge, the Southern University of New Orleans (SUNO) campus incurred substantial damages. The SUNO L. Washington Library building (ID#00305) sustained severe damage due to wind, wind driven rain and approximately four feet of flood water which remained in the building for at least three weeks. The 66,544 SF, three-story library building was constructed in 1963. The scope of work includes repair/replacement to pre-disaster condition of the following: roofing system; skylight domes; windows and doors and associated hardware; ceiling tiles and grid system; ceiling and wall drywall; wood and rubber trim; single glazed site glasses; soffit; insulation and vapor barrier; flooring (tile and carpet); ceramic tiles walls; lighting fixtures; cabinetry; sinks/faucets; elevators; mechanical and electrical systems (HVAC System, Fire Protection System, Security System); metal safety railing (along sidewalk), pressure cleaning steps, walkways, exterior facade walls; cleaning and sanitation of concrete masonry unit (CMU) walls, storefront glazing walls, marble veneer wall, ceramic tiled walls; floor tile; demolition and replacement of CMU walls where necessary. All work is being preformed within the original footprint of the building; the building is located in a developed area within a university campus.

The attached Hazard Mitigation Proposal seeks to mitigate against future flood damage to the electrical and mechanical systems. Mitigation measures include elevating a single phase, 240-volt dry-type step-down transformer and a 30 gallon, single-stage air compressor with pneumatic controller (for the chiller system). The units will be secured to a welded steel-frame platform above the experienced flood level. Furthermore, the electrical panel boards and the three fire-protection system control panels would be raised above the experienced flood levels plus one foot (approximately 2 ft total).

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:

FEMA's Programmatic Agreement (PA), dated December 3, 2004, provides for expedited project review under Section 106 of the National Historic Preservation Act (NHPA). The scope of work as submitted in this PW has been reviewed and meets the criteria outlined in Appendix A, Programmatic Allowances, Sections {II-A2, II-C1, II-F2, II-H, II-A4, II-B}, of the document. In accordance with the PA, FEMA is not required to determine the National Register eligibility of properties or to submit projects to the State Historic Preservation Officer (SHPO) for review where the scope of work meets these allowances. In keeping with the stipulations of the PA, all proposed repair activities should be done in-kind to match existing materials and form. Any change to the approved scope of work will require resubmission for re-evaluation under Section 106 and consultation with the SHPO. Non-compliance may jeopardize the receipt of federal funding.

Correspondence/Consultation/References:

NHPA effect determinations made by V. Gomez, 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: None.

Correspondence/Consultation/References:

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 "A-7", area of 100 year flood.
Correspondence/Consultation/References: FEMA Flood Insurance Rate Map, Community Panel No. 225203 0095 E, revised 03/01/84.

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>) 02/21/2007.

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 70126 are: 87.1% African American, 10.3% Caucasian and 1.6% Latino. The median household income in 1999 was \$ 30,627 and 18.8 % of families are below poverty level.
Correspondence/Consultation/References:
U.S. Census bureau 2000 data at <http://factfinder.census.gov>, referenced 02/21/2007.

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:
Coastal Zone Management Act:
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.

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.

Formosan Termite Initiative Act:

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).

Correspondence/Consultation/Reference:

V. ENVIRONMENTAL REVIEW PROJECT CONDITIONS

Project Conditions:

- 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, 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.
- 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.
- FEMA's Programmatic Agreement (PA), dated December 3, 2004, provides for expedited project review under Section 106 of the National Historic Preservation Act (NHPA). The scope of work as submitted in this PW has been reviewed and meets the criteria outlined in Appendix A, Programmatic Allowances, Sections {II-A2, II-C1, II-F2, II-H, II-A4, II-B}, of the document. In accordance with the PA, FEMA is not required to determine the National Register eligibility of properties or to submit projects to the State Historic Preservation Officer (SHPO) for review where the scope of work meets these allowances. In keeping with the stipulations of the PA, all proposed repair activities should be done in-kind to match existing materials and form. Any change to the approved scope of work will require resubmission for re-evaluation under Section 106 and consultation with the SHPO. Non-compliance may jeopardize the receipt of federal funding.
- The City of New Orleans/Orleans Parish enrolled in the National Flood Insurance Program (NFIP) 08/03/70. Per Flood Insurance Rate Map (FIRM) 225203 0095 E, dated 03/01/84, site located in Zone "A-7", area of 100-year flooding, base flood elevations and flood hazard factors determined. Project is repair of a building and replacement of components for which the applicant must follow all applicable local, state and federal laws, regulations and requirements. In compliance with E.O. 11988, an 8-step process was completed and attached. Per 44 CFR 9.11, the replacement of contents,

materials and equipment shall either be flood proofed or elevated above the Advisory Base Flood Elevations (ABFE). Per 44 CFR 9.12, applicant must publish a final public notice 15 days prior to the start of construction activities. Final notice is to be forwarded to the LA GOHSEP and FEMA for inclusion in the permanent project files.

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 2/22/07 .

FEMA Regional Environmental Officer or delegated approving official.

Name: William Fagan

Signature [Signature] . Date 3/1/2007 .