

# ABBREVIATED RECORD OF ENVIRONMENTAL CONSIDERATION

See 44 Code of Federal Regulation Part 10.

**Project Name/Number:** EOR0266 UNO Business Building/ PW #6390/000-UXL4N-00

**Project Location:** 2000 Lakeshore Drive, New Orleans, Louisiana, Orleans Parish, Latitude: 30.02058, Longitude: -90.05968

**Project Description:** Due to strong winds, wind driven rain and flying debris from Hurricane Katrina, the business administration building of the University of New Orleans at 2000 Lakeshore Drive in New Orleans, Louisiana sustained numerous of damages. The scope of work activities includes removal and replacing a laminated safety door, window and safety glass, redistributing and replacing loose aggregated rocks on the roof, removing and replacing roof insulation and membrane, high top exhaust fans, roof top air hoods, reinstalling lighting arrestor cable and connectors. The third floor will require mold remediation and replacing acoustical ceiling panels, carpet, vinyl composition floor tile, gypsum wallboard, rubber base, hardwood veneer plywood, prepping and painting the adjacent gypsum wallboard surfaces.

Hazard mitigation has proposed to improve the structural integrity of the roof by providing and installing four metal strap ties (16GA., 1 3/8" x 24") per roof top exhaust fans (including three damaged and replacing, as well as two undamaged fans). Providing and installing six metal straps ties per roof top air hood (including three damaged and replacing, as well as two undamaged). Finally, replacing the repaired 38" x 97 3/8" storefront tempered glass with 1/4" plexiglass, damaged glazing 30" x 76", 38" x 78" (stairway S-13) storefront door, and installing 1/4" plexiglass for a 38" x 54 and 38" x 22" storefront door. This will mitigate against damage to the roof-top HVAC system in future wind events.

## 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 criteria for Alternative Arrangement Permanent School. This project has conditions and requires Mitigation under the other Environmental and Historic Preservation Laws.

### **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:** Pursuant to 36 CFR Part 800.3 (1), This undertaking, regarding the replacement/repair of building materials, is a type of activity that does not have the potential to cause effects on Historic properties, assuming such Historic properties were present, therefore FEMA has no further obligations under Section 106 or 36 CFR Part 800. ?

**Correspondence/Consultation/References:** Chelsea Klein, 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:** None

### **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 will have no affect on Endangered Species. No further consultation is required. USFWS emergency consultation provisions determined in letter dated September 15, 2005.  
**Correspondence/Consultation/References:** None

**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 "A0", area of 100-yr shallow flooding where depths are between 1 and 3 feet, average depths of inundation are shown.  
**Correspondence/Consultation/References:** FEMA Flood Insurance Rate Map, Community Panel No. 225203 0095 E, revised 3/1/1984.

**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:** Project scope will not cause the Destruction, Loss or Degradation of Wetlands.  
**Correspondence/Consultation/References:** USFWS NWI map accessed on-line (<http://wetlandsfws.er.usgs.gov/wtlnds/launch.html>) 6-17-05.

**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 70148 are: 67.3% African American, 28.1% White and Hispanic 3.1%. The median household income in 1999 was \$ 27,133 and 23.7 % of families are below poverty level.  
**Correspondence/Consultation/References:** U.S. Census bureau 2000 data at <http://factfinder.census.gov>, referenced 6-17-06.

### 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: R.C.R.A. 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.

**C.Z.M.A. – Coastal Zone Management Act**

This project is located within the Louisiana Coastal Management one. LA DNR has determined that receipt of Federal Assistance is consistent with the Louisiana Coastal Resource Program. Projects within the Coastal Zone may still require a Coastal Zone Use Permit or other authorization from DNR. Projects may be coordinated by contacting LA. DNR at 1-800-267-4019

**F.T.I.A Formosan Termite Initiative Act**

In accordance with the Formosan Termite Initiative Act, (LA R.S. 3:3391.1 through 3391.13) the Louisiana Parish of Orleans 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 parish without written authorization from the commissioner of the Louisiana Department of Agriculture and Forestry or his designee(s).

**Correspondence/Consultation/Reference:** None

### V. ENVIRONMENTAL REVIEW PROJECT CONDITIONS

Project Conditions:

**In addition, the following conditions apply as a condition of FEMA funding reimbursement:**

- This project is located within the Louisiana Coastal Management Zone. LA DNR has determined that receipt of Federal Assistance is consistent with the Louisiana Coastal Resource Program. Projects within the Coastal Zone may still require a Coastal Use Permit or other authorization from DNR. Projects may be coordinated by contacting LA. DNR at 1-800-267-4019
- 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 Orleans 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 parish without written authorization from the commissioner of the Louisiana Department of Agriculture and Forestry or his designee(s).
- Per 44 CFR 9.11(d)(9), the replacement of materials and equipment, where possible, disaster proofing and/or elimination of such future losses by relocation outside or above the advisory base floodplain. Per 44 CFR 9.12, applicant must publish a final public notice 15 days prior to the start of construction activities. A certified copy of the published final public notice is to be forwarded to the Louisiana Governor's Office of Homeland Security 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.**