

ABBREVIATED RECORD OF ENVIRONMENTAL CONSIDERATION

See 44 Code of Federal Regulation Part 10.

Project Name/Number: Clinical Sciences and Research Facility (State ID 13115)/ PW 9119

Project Location: 533 Bolivar St, New Orleans, Louisiana, Orleans Parish, Latitude: 29.95547 N, Longitude: 90.08360 W

Project Description: Due to Hurricane Katrina’s catastrophic flood damage to the Clinical Sciences and Research Facility, a Hazard Mitigation Proposal was issued for the facility. Applicant is proposing to relocate all main telecom closets and core networking equipment to the third floor. Applicant will first remove the damaged mechanical, electrical and plumbing and then elevate the new equipment to the third floor.

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: 11/30/06 - Although this project would have qualified as a Categorical Exclusion, (xv) and (xvi) under 44 CFR part 10.8 (d)(2), this project meets the definition of critical infrastructure (hospitals and health care facilities) under the Alternative Arrangements for NEPA compliance. This project has conditions and requires mitigation under the other Environmental and Historic Preservation (EHP) laws which are listed under the NEPA level of environmental review in the project worksheet. Any changes to this approved scope of work will require submission to, and evaluation and approval by, the State and FEMA prior to initiation of any work, for compliance with the National Environmental Policy Act. The applicant is required to obtain and comply with all local, state and federal permits and requirements. Non-compliance with the requirements noted above may jeopardize the receipt of federal funding. Andrew Guempel, Environmental Specialist.

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: 11/30/06 - The structure does not meet the 50-year-criterion, nor does it possess the level of exceptional importance required by criteria consideration 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 historic properties.

Derek A. Galose Historic Preservation

Correspondence/Consultation/References: NHPA effect determinations made by Derek A. Galose , 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:

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: Listed species habitat does not occur in or near this site, thus this project will have no effect to threatened or endangered species.

Correspondence/Consultation/References: USFWS emergency consultation provisions determined in letters 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: 06/29/2006 - The city of New Orleans/Orleans parish enrolled in the National Flood Insurance Program 08/03/70. Per Flood Insurance Rate Map (FIRM) panel 225203 0160e, dated 03/01/1984, project is located in Zone A4, area of 100-year flooding; Base Flood Elevations and Flood Hazard Factors determined. Project is replacement of networking equipment damaged by flood and is not likely to affect the floodplain. Per 44 CFR 9.11, for the replacement of building contents, materials and equipment, the building must be either flood proofed or future losses shall be eliminated by relocation of those building contents, materials and equipment outside or above the Advisory Base Flood Elevation. - Kimberly R. Rogers, Floodplain Management Specialist

Correspondence/Consultation/References: Kimberly R. Rogers, Floodplain Management Specialist

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>) 11/30/06.

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 Orleans Parish are: 67.5% Black, 28% White and 2.4% Asian. The median household income in 1999 was \$ 30,711.

Correspondence/Consultation/References: U.S. Census bureau 2000 data at <http://factfinder.census.gov>, referenced 11/30/06.

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: None

Correspondence/Consultation/Reference:

V. ENVIRONMENTAL REVIEW PROJECT CONDITIONS

Project Conditions:

- Applicant should handle, manage, and dispose of potentially hazardous waste, biomedical waste, radioactive waste, universal waste, and hazardous materials in accordance with the requirements of local, state, and federal regulations. These materials may include but are not limited to asbestos, lead-based paint, laboratory reagents, propane cylinders, paints and solvents, coolants containing chlorofluorocarbons (CFCs), used oil, polychlorinated biphenyls (PCBs), other petroleum products, used oil filters, fuel filters, cleaning chemicals, pesticides, batteries, and unlabeled tanks and containers. Equipment that may include these materials are ice machines, refrigerators, generators, computers, televisions, mercury switches, fluorescent lights, fluorescent light ballasts, sandblast units, paint sprayers, etc.
- This project is located within the Louisiana Coastal Management Zone. Louisiana Department of Natural Resources (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 projects 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.
- 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., incorporating the provisions of 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.
- 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).
- Mercury containing devices - this project potentially involves the disposal of metallic mercury containing electronic devices. The applicant is responsible for ensuring that these devices are recovered, recycled, reused or sequestered in accordance with the Louisiana Department of Environmental Quality (LDEQ) "Declaration of Emergency; mercury-containing devices and electronic equipment as universal waste" letter dated October 3, 2005.

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

REVIEWER AND APPROVALS

FEMA Environmental Reviewer.

Name: Andrew Guempel ← *Karyn Harrison for*

Signature *Karyn Harrison* . Date *12/7/2006*

FEMA Deputy Environmental Liaison Officer

Name: William Fagan

Signature *W Fagan* . Date *12/07/2006*