

# Record of Environmental Consideration

REVISED FOR FEMA ENVIRONMENTAL -- LOUISIANA -- 2006

See 44 Code of Federal Regulation Part 10

**Project Name/Number:** Buras Wastewater Treatment Plant/PW 12943 Version 1/FIPS 075-99075-00

**Project Location:** State Highway 23 and Eldorado St., Buras, Plaquemines Parish, Louisiana  
70083 Latitude: 29.34173, Longitude: -89.516918

**Project Description:** Strong winds, heavy rainfall and floodwaters caused extensive damage to the Buras Wastewater Treatment Plant. Project Worksheet 12943 Version 0 was for the repair of the facility. PW 12943 Version 1 is for additional work not captured in Version 0 and the addition of a Hazard Mitigation Proposal. The additional work includes costs for repairing roofing, walls, doors and frames, chain link fence, and gates; for replacing damaged equipment; and for removing debris and sludge. One mitigation proposal is to elevate the motor control mount by moving it from the first floor and mounting it on the roof. The second proposal is to replace the flooded suction pumps with dry pit submersible pumps.

## 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 - (Reference PCE in comments) **(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 (utilities and wastewater treatment plants) under the Alternative Arrangements for NEPA compliance.

## Reviewer and Approvals

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

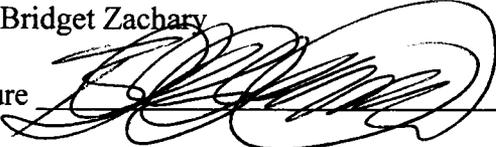
### **FEMA Environmental Reviewer:**

Name: Nicole Poret

Signature Nicole Poret Date 3/13/07

**FEMA Regional Environmental Officer or Delegated Approving Official:**

Name: Bridget Zachary

Signature  Date 3-13-07

**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. II  
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:** The structure(s) does not meet the 50-year-criterion, nor does it possess the level of exceptional importance required by criteria consideration of the national register guidelines to be considered eligible for the National Register of Historic Places. Scope of work indicates ground disturbing activities associated with replacing fencing and fence gates plus demolishing and rebuilding a flare pipe foundation, a chemical storage containment and maintenance/storage sheds within their pre-disaster footprint only. Additionally, one storage shed will be elevated. Upon consultation of data provided by the State Historic Preservation Office (SHPO), there are no known archaeological sites within 0.5 miles of the project area and background research and a site visit indicate a low probability of site occurrence. Demolition must follow the lower-impact demolition stipulations which are attached. These stipulations should be explicit in the demolition contract. If during the

course of work, archaeological artifacts (prehistoric or historic) or human remains are discovered, the applicant shall stop work in the vicinity of the discovery and take all reasonable measures to avoid or minimize harm to the finds. The applicant shall inform their public assistance (pa) contacts at FEMA, who will in turn contact FEMA historic preservation (hp) staff. The applicant will not proceed with work until FEMA hp completes consultation with the SHPO. In addition, if unmarked graves are present, compliance with the Louisiana Unmarked Human Burial Sites Preservation Act (R.S. 8:671 et seq.) is required. The applicant shall notify the law enforcement agency of the jurisdiction where the remains are located within twenty-four hours of the discovery. The applicant shall also notify FEMA and the Louisiana Division of Archaeology at 225-342-8170 within seventy-two hours of the discovery. If this scope of work and/or the footprint/location of the new building changes, this project will need to be resubmitted for further Section 106 review prior to ground disturbing activities taking place. Failure to comply with these stipulations may jeopardize receipt of federal funding.

**Correspondence/Consultation/References:** Dana Linck, Historic Preservation Specialist/Archaeologist

## 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:**

**Correspondence/Consultation/References:** Endangered Species Summary for USFWS Consultation, letter to Don Fairley dated September 15, 2005

## 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:**

**Correspondence/Consultation/References:** Louisiana Coastal Barrier Resource System Maps referenced March 13, 2007.

## 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:** The applicant shall coordinate with or obtain any required permits or certifications for wastewater treatment plants from the Louisiana Department of Environmental Quality (LDEQ) and U.S. Corps of Engineers (USACE) prior to initiating work. The applicant shall comply with all conditions of the permits regulated under Section 402 and 404 of the Clean Water Act. All coordination pertaining to these activities should be documented and copies forwarded to the state and FEMA as part of the permanent project files.

**Correspondence/Consultation/References:** USFWS National Wetlands Inventory map (<http://www.fws.gov/nwi/>) queried on March 13, 2007, damage description and scope of work from PW 12943 Version 1

## 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:** 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 LA DNR. Projects may be coordinated by contacting LA DNR at 1-800-267-4019.

**Correspondence/Consultation/References:** Louisiana Coastal Zone maps queried March 13, 2007

### F. Fish and Wildlife Coordination Act

- Project does not affect, control, or modify a waterway/body of water. **(Review Concluded)**
- Project affects, controls or modifies 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:**

**Correspondence/Consultation/References:** Damage description and scope of work from PW 12943 Version 1

### 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:** 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 (ACM's) 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/References:** EPA Region 6 Non-attainment Map, damage description and scope of work from PW 12943 Version 1

### 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 a facility in a developed complex and FPPA is precluded.

**Correspondence/Consultation/References:** Damage description and scope of work from PW 12943 Version 1

### 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:**

**Correspondence/Consultation/References:** [http://library.fws.gov/Pubs/Mississippi\\_Flywaymap.pdf](http://library.fws.gov/Pubs/Mississippi_Flywaymap.pdf), damage description and scope of work from PW 12943 Version 1

### 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:** Damage description and scope of work from PW 12943 Version 1

### 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:**

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

### L. Other Relevant Laws and Environmental Regulations

#### 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 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).

## 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 parish of Plaquemines is enrolled in the National Flood Insurance Program (NFIP) as of 05/01/85. Per Flood Insurance Rate Map (FIRM) panel number 2201390885C dated 09/28/90; project is located in zone "A99", areas of 100-year flood to be protected by flood protection system under construction, base flood elevations and flood hazard factors not determined. Project is for repair of a critical facility and replacement of mechanical and electrical equipment and components. Facility is functionally dependent on its location. Applicant must coordinate and comply with local floodplain ordinances, and follow current codes and standards. Applicant is required to coordinate with the local floodplain administrator regarding floodplain permit(s) prior to the start of any activities. Applicant is responsible for obtaining and retaining all permits and certificates for verification. All coordination pertaining to these permit(s), should be documented to the local floodplain administrator and copies provided to the Louisiana Governor's Office of Homeland Security and Emergency Preparedness (LA GOHSEP) and FEMA as part of the permanent project files. In compliance with E.O. 11988, an 8-step process, showing considered alternatives, was completed and is attached. Per Advisory Base Flood Elevation maps (ABFE), all equipment and contents should be elevated at least 3 ft. above the highest existing adjacent grade. Per 44 CFR 9.12, applicant must publish a final public notice 15 days prior to the start of construction activities. Final public notice is to be forwarded to the LA GOHSEP and FEMA for inclusion in the permanent project files.

**Correspondence/Consultation/References:** FEMA Flood Insurance Rate Map, Community Panel No. 2201390885C, dated 09/28/90. J. Schexnayder, CFM

### 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:**

**Correspondence/Consultation/References:** USFWS NWI map accessed on-line March 13, 2007.

### 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 70083 are: 43.9% African American, 45.2% Caucasian and 7.7% American Indian. The median household income in 1999 was \$ 29,714 and 20.9 % of families are below poverty level.

**Correspondence/Consultation/References:** U.S. Census bureau 2000 data at <http://factfinder.census.gov>, referenced March 13, 2007.

## 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).

**Comments:** For NEPA compliance: 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.

**Correspondence/Consultation/Reference:**

### 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.**

**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:**

### V. Environmental Review Project Conditions

#### Project Conditions:

1. Demolition must follow the lower-impact demolition stipulations. These stipulations should be explicit in the demolition contract.
2. If during the course of work, archaeological artifacts (prehistoric or historic) or human remains are discovered, the applicant shall stop work in the vicinity of the discovery and take all reasonable measures to avoid or minimize harm to the finds. The applicant shall inform their public assistance (pa) contacts at FEMA, who will in turn contact FEMA historic preservation (hp) staff. The applicant will not proceed with work until FEMA hp completes consultation with the SHPO. In addition, if unmarked graves are present, compliance with the Louisiana Unmarked Human Burial Sites Preservation Act (R.S. 8:671 et seq.) is required. The applicant shall notify the law enforcement agency of the jurisdiction where the remains are located within twenty-four hours of the discovery. The applicant shall also notify FEMA and the Louisiana Division of Archaeology at 225-342-8170 within seventy-two hours of the discovery. If this scope of work and/or the footprint/location of the new building changes, this project will need to be resubmitted for further Section 106 review prior to ground disturbing activities taking place. Failure to comply with these stipulations may jeopardize receipt of federal funding.
3. 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.
4. 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 Record of Environmental Consideration (Version 3/14/06)

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).

5. The applicant shall coordinate with or obtain any required permits or certifications for wastewater treatment plants from the Louisiana Department of Environmental Quality (LDEQ) and U.S. Corps of Engineers (USACE) prior to initiating work. The applicant shall comply with all conditions of the permits regulated under Section 402 and 404 of the Clean Water Act. All coordination pertaining to these activities should be documented and copies forwarded to the state and FEMA as part of the permanent project files.
6. 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 LA DNR. Projects may be coordinated by contacting LA DNR at 1-800-267-4019.
7. 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 (ACM's) be present at the project site, the applicant is also responsible for ensuring proper disposal in accordance with the previously referenced administrative order.
8. Applicant must coordinate and comply with local floodplain ordinances, and follow current codes and standards. Applicant is required to coordinate with the local floodplain administrator regarding floodplain permit(s) prior to the start of any activities. Applicant is responsible for obtaining and retaining all permits and certificates for verification. All coordination pertaining to these permit(s), should be documented to the local floodplain administrator and copies provided to the Louisiana Governor's Office of Homeland Security and Emergency Preparedness (LA GOHSEP) and FEMA as part of the permanent project files. In compliance with E.O. 11988, an 8-step process, showing considered alternatives, was completed and is attached. Per Advisory Base Flood Elevation maps (ABFE), all equipment and contents should be elevated at least 3 ft. above the highest existing adjacent grade. Per 44 CFR 9.12, applicant must publish a final public notice 15 days prior to the start of construction activities. Final public notice is to be forwarded to the LA GOHSEP and FEMA for inclusion in the permanent project files.
9. 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.