

Record of Environmental Consideration

REVISED FOR FEMA ENVIRONMENTAL -- LOUISIANA -- 2007

See 44 Code of Federal Regulation Part 10

Project Name/Number: Archdiocese of New Orleans/FIPS Number 000-UV6IX-00

Project Location: Relocation Site: Intersection of LA 1077 and LA 1085, Goodbee, LA
(N30.46766, W-90.18208)

Archbishop Hannan High School: 2501 Archbishop Philip M. Hannan Blvd.,
Meraux, LA (N29.93436, W-89.92314)

Redeemer Seton High School: 1500 Prentiss Ave., New Orleans, LA
(N30.01341, W-90.07751)

St. Francis Xavier Cabrini School: 1500 Prentiss Ave., New Orleans, LA
(N30.014360, W-90.07613)

Project Description: By letter dated July 3, 2007 from Colonel Thomas Kirkpatrick, State Coordinating Officer with the Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP) to Mr. James Stark, Director of the Federal Emergency Management Agency (FEMA) Louisiana Transitional Recovery Office (TRO), the state has requested an Improved Project on behalf of the Archdiocese of New Orleans. The Archdiocese of New Orleans wishes to relocate the functionality of the educational institution Archbishop Hannan High School from its pre-Katrina location at 2501 Archbishop Philip M. Hannan Blvd., Meraux, LA to that of the 20 acre site at the intersection of LA 1077 and LA 1085 in Goodbee, LA.

As is well known, the catastrophic nature of Hurricane Katrina (DR-1603) has caused significant economic hardship and demographic realignments of the Greater New Orleans communities, including the school districts. For this reason, the Archdiocese of New Orleans has to re-structure the location of its schools. Three schools are directly affected and incorporated in this request for an Improved Project: Archbishop Hannan High School, formerly in Meraux, LA; the St. Frances Xavier Cabrini School and Redeemer Seton High School, both in New Orleans. Archbishop Hannan High School was eligible for replacement and the other two schools were eligible for repair. However, because the current enrollment figures indicate a smaller population than pre-disaster, the Archdiocese will consolidate the pre-disaster functions of all three schools into the proposed Archbishop Hannan High School being relocated to Goodbee, LA. The aggregate square footage for the damaged facilities was 214,804 square feet (SF) and accommodated approximately 1200 students. The proposed facility will have 81,472 SF. The current enrollment is expected to be less than 800 students. However, the Archdiocese will be able to expand the capacity to approximately 1300 as the population returns.

The applicant proposes to clear, grade, excavate, and deposit fill in the Goodbee, LA location to construct the new Archbishop Hannan High School. The proposed school will be located on a 20 acre tract of land and will impact approximately 2.49 acres of jurisdictional wet pasture land through the construction of buildings, driveways, parking, landscaping, utilities, drainage, and associated amenities. The fill operation will include the deposition of approximately 13,555 cubic yards (cy) of hauled in earthen material of which 2,789 cy will be placed in wetlands, 3,098 cy of re-distributed native earthen material, and 4,473 cy of concrete of which 356 will be placed in wetlands.

This project qualifies for the National Environmental Policy Act (NEPA) Alternative Arrangements for the Reconstruction of Critical Infrastructure in the New Orleans Metropolitan Area. Under the regular FEMA NEPA review, this project would have qualified as an Environmental Assessment. However, due to the unprecedented amount of grants requested that need to be processed in a short time and the potential cumulative effects of FEMA's funding in the New Orleans Metropolitan Area, FEMA has determined that this type of

action may have significant impacts that cannot be reviewed under the normal Environmental Impact Statement (EIS) process. FEMA, Department of Homeland Security (DHS), and the Council on Environmental Quality (CEQ) have adopted the Alternative Arrangements to address the basic elements of NEPA under these circumstances. For more information visit www.fema.gov/plan/ehp/noma/index.shtm.

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 - Category (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 criteria for the Alternative Arrangement, permanent school, type of project. This project has conditions and requires mitigation under the other EHP laws.

Reviewer and Approvals

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

FEMA Environmental Reviewer:

Name: Adam Borden, FEMA Environmental Specialist

Signature Adam Borden Date 8-13-07

FEMA Regional Environmental Officer or Delegated Approving Official:

Name: Howard R. Bush, Environmental Liason Officer

Signature Howard R. Bush Date 8-13-07

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
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: Scope of work indicates ground disturbing activities associated with the construction of a new school facility. Upon consultation of data provided by the State Historic Preservation Office (SHPO), there are no known archaeological sites within .5 miles of the project area. As a result of a Phase I archaeological survey was carried out by Earth Search, Inc., no artifacts or intact archaeological deposits were recorded. Additionally, no historic standing structures were located within the APE. Therefore, FEMA (see attached SHPO correspondence dated 7/25/07) recommended that no historic properties would be affected by the undertaking. SHPO concurred with this recommendation on 7/30/07. 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. Failure to comply with these stipulations may jeopardize receipt of FEMA funding.

Correspondence/Consultation/References: NHPA effect determinations made by Jerame J. Cramer, 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: Per USFWS consultation, this project has been reviewed for effects to Federal trust resources under the USFWS jurisdiction and currently protected by the Endangered Species Act of 1973. The project as proposed is not likely to adversely affect those resources.

Correspondence/Consultation/References: USFWS consultation letter signed July 18, 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: No project activities are within a CBRA zone.

Correspondence/Consultation/References: Louisiana Coastal Barrier Resource System Maps referenced 07/24/07.

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 NO (**Review Concluded**)

Comments: Applicant obtained U.S. Army Corps of Engineers (USACE) administered Section 404 permit number MVN 2006-2158 EFF. Applicant is responsible for complying with all terms and conditions of this approval. Non-compliance with these requirements may jeopardize the receipt of federal funding.

- If required by LDEQ, the applicant shall require its contractor to prepare, certify, and implement a construction storm water pollution prevention plan to prevent sediment and construction material transport from the sites (regulated under NPDES Program, Section 402). A Louisiana Pollution Discharge Elimination System (LAPDES) permit will be required in accordance with the CWA and the Louisiana Clean Water Code. 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: Section 404 permit number MVN 2006-2158 EFF

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: Review of state coastal zone boundary confirms project is not located within the Louisiana Coastal Management Zone.

Correspondence/Consultation/References: LDNR Louisiana Coastal Zone map 2002.

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: Per USFWS consultation, this project has been reviewed for effects to Federal trust resources under the USFWS jurisdiction. The project as proposed is not likely to adversely affect those resources.

Correspondence/Consultation/References: USFWS consultation letter signed July 18, 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: Minor amounts of fugitive dust raised during grading of site should not create air emission issues. Care should be taken to minimize the generation of fugitive dust during construction.

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: Due to the low relative value of farmland (69 of 100) determined by NRCS, and the FEMA determined low total site assessment (44 of 160), this conversion activity is determined to be consistent with the FPPA.

Correspondence/Consultation/References: National Resource Conservation Service, Web Soil Survey (<http://websoilsurvey.nrcs.usda.gov/app/>) referenced 07/02/07. AD-1006 consultation with NRCS St. Tammany parish District Conservationist, Tony Beaubouef dated 7/16/07.

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: Per USFWS consultation, this project has been reviewed for effects to Federal trust resources under the USFWS jurisdiction. The project as proposed is not likely to adversely affect those resources.

Correspondence/Consultation/References: USFWS consultation letter signed July 18, 2007.

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: Wetlands on this site were determined to be comprised of low quality wet pasture land areas.
Correspondence/Consultation/References: Louisiana Map (<http://www.lamap.doa.louisiana.gov/>) referenced 07/24/07.
USACE Section 404 Permit No. MVN 2006-2158 EFF

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: The only Wild and Scenic River (WSR) listed in Louisiana is Saline Bayou which is located along the Natchitoches/Winn Parish border. Project does not affect Wild or Scenic Rivers
Correspondence/Consultation/References: National Wild and Scenic Rivers <http://www.nps.gov/rivers/wildriverslist.html>. referenced 07/24/07 .

L. Other Relevant Laws and Environmental Regulations

State Hazardous Materials and Solid Waste Laws and Resource Conservation and Recovery Act

Comments: The construction activities associated with this project may result in various types of debris and wastes, some of which may be hazardous. Therefore, all debris and waste must be treated, stored, and disposed of in a proper manner and location. (See Section V)

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 St. Tammany enrolled in the National Flood Insurance Program (NFIP), as of 04/23/1971. The project is located within a "A" zone, area of 100-yr flooding; base flood elevations and flood hazard factors not determined, as per Flood Insurance Rate Map (FIRM) panel number 2252050210 C, dated 10/17/1989. This improved project is for the relocation and construction of a new high school campus, including administration, classroom, gymnasium, cafeteria, and maintenance buildings and all related site improvements.
<http://store.msc.fema.gov/webapp/wcs/storeservlet/FemaWelcomeView?storeId=10001&catalogId=10001&langId=-1>,

Correspondence/Consultation/References: FEMA Flood Insurance Rate Map, Community Panel No. # 2252050210 C

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: Applicant obtained USACE administered Section 404 permit number MVN 2006-2158 EFF. Applicant is responsible for complying with all terms and conditions of this approval. Non-compliance with these requirements may jeopardize the receipt of federal funding.

Correspondence/Consultation/References: Section 404 permit number MVN 2006-2158 EFF

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 70433 (relocation site) are: 11.8% Black, 85.9% White, and 2.3% Hispanic. The median household income in 1999 was \$ 47,447 and 8% of families are below poverty level.

The percent populations of 70122 (St. Francis Xavier and Redeemer Seton schools) are: 73.2% Black, 23.0% White, and 3.2% Hispanic. The median household income in 1999 was \$ 31,104 and 19.9% of families are below poverty level.

The percent populations of 70122 (Archbishop Hannan school site) are: 3.8% Black, 92.5% White, and 3.7% Hispanic. The median household income in 1999 was \$ 47,958 and 7.8% of families are below poverty level.

The applicant, Archdiocese of New Orleans, provided FEMA's NEPA Compliance Public Outreach Team with documentation citing numerous news articles and editorials, local news broadcasts, local radio talk shows, public hearings to change zoning, public signage, a public website, and personal messages. FEMA's NEPA Compliance Public Outreach Team has determined that Archdiocese of New Orleans has provided sufficient documentation to demonstrate satisfactory public involvement for this project.

The Archdiocese of New Orleans' Archbishop Hannan High School hired contractor GCR & Associates to develop a preliminary study for population trends within the Greater New Orleans area. The report specifically addresses the enrollment prospects for a proposed, newly constructed Archbishop Hannan High School in Goodbee, LA. Using population forecasting and trend analysis, GCR concludes that the southwestern St. Tammany Parish area can support a new 800 person Archbishop Hannan High School for the following reasons: (1) The majority of new housing development in St. Tammany and Tangipahoa Parishes lies within the catchment area of the school and the proposed location is strategically located in the emerging I-12 corridor between Baton Rouge and St. Tammany. (2) Many of the new residents to the Northshore have been relocated from the parishes south of Lake Ponchartrain and bring a strong tradition of Catholic education to St. Tammany and Tangipahoa Parishes. (3) A new Catholic high school, with modern academic and athletic facilities, would attract a considerable number of students. The GCR study also cites a considerable permanent migration of St. Bernard Parish residents to the northshore of Lake Ponchartrain. The study cites that St. Bernard Parish's population is down 62 percent since the disaster and the number of children (up to 14 years old) is down 74 percent.

Correspondence/Consultation/References:

U.S. Census bureau 2000 data at <http://factfinder.census.gov>, referenced 07/31/07.

Archbishop Hannan High School Preliminary Study – Population Trends prepared by GCR & Associates, 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).

Traffic:

The Archdiocese's Traffic Impact Analysis, addresses the traffic impact that can be expected from the new campus of Archbishop Hannan High School on the proposed property. The analysis concludes that the transportation network along with planned improvements can reasonably accommodate the additional trips caused by the proposed development. The study recommends the following improvements as a result of the new development: Adding a westbound approach on US 190 at the intersection of LA 1077 and adding a right turn lane Northbound at the LA 1077/I-12WB ramp.

Noise:

Short-term, minor impacts would be expected during demolition and construction activities.

Correspondence/Consultation/Reference: Traffic Impact Analysis for: A New Campus For Archbishop Hannan High School prepared by Krebbs, LaSalle, Lemieux Consultatants Inc. 2/2007.

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:

(ii): This project qualifies for expedited considerations under the Alternative Arrangements (AA) for NEPA Compliance. Applicants for FEMA's Public Assistance (PA) funding are required under AA to produce a public involvement plan and obtain public input regarding a proposed project. Based on documentation provided by the applicant, including numerous news articles and editorials, local news broadcasts, local radio talk shows, public hearings to change zoning, public signage, a public website, and personal messages, FEMA's NEPA Compliance Outreach Team has determined that Archdiocese of New Orleans has provided sufficient documentation to demonstrate satisfactory public involvement for this project.

(vii): The proposed school will be located on a 20 acre tract of land and will impact approximately 2.49 acres of jurisdictional wet pasture land through the construction of buildings, driveways, parking, landscaping, utilities, drainage, and associated amenities. Applicant obtained USACE administered Section 404 permit number MVN 2006-2158 EFF for proposed action. Applicant is responsible for complying with all terms and conditions of this approval. Non-compliance with these requirements may jeopardize the receipt of federal funding.

(x): This project relates to the previously FEMA funded improved project packet for the Holy Cross School of New Orleans (FIPS# 071-UIZ17-00) dated 3/19/07. The previous project involved the relocation of the Holy Cross School of New Orleans (4950 Dauphine St., New Orleans) to the campus of Redeemer Seton High School and St. Frances Xavier Cabrini High School, both located at 1500 Prentiss Ave., New Orleans, LA. The Archdiocese of New Orleans wishes to relocate the functionality of the educational institutions of Redeemer Seton, St. Frances Xavier Cabrini, and Archbishop Hannan schools to the aforementioned Goodbee, LA location. Those activities involving the relocation of the Holy Cross School of New Orleans were reviewed for compliance with all Environmental and Historic Preservation Laws in the referenced Improved Project packet dated 3/19/07.

Correspondence/Consultation/Reference: www.fema.gov/plan/ehp/noma/index.shtm.

V. Environmental Review Project Conditions

Project Conditions:

The following conditions apply as a condition of FEMA funding reimbursement:

- 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).
- Removal and disposal of debris containing household hazardous waste and certain categories of liquid wastes must be performed in accordance with all applicable federal and state laws, regulations, executive orders and guidelines. LAC title 33 part VII requires that specified items, including lead acid batteries, used oil filters, used motor oil, scrap tires, cfc's (refrigerants), radioactive waste or regulated infectious wastes must be segregated from and excluded from non-hazardous debris collection, staging, processing and disposal sites. Failure to comply with applicable legal requirements in debris collection and/or disposal operations will jeopardize federal funding. The clean-up or restoration/repair of sites damaged as a result of such operations are ineligible for federal funding. Previously obligated funding is subject to de-obligation if a determination of ineligibility is made.
- Applicant is required to coordinate with local floodplain administrator regarding floodplain permit(s) prior to the start of any activities. Applicant is responsible for meeting all requirements of the permit(s). All coordination pertaining to these permit(s), should be documented to the local floodplain administrator and copies provided to LA GOHSEP and FEMA as part of the permanent project files. In compliance with E0 11988, a completed 8-step process showing considered alternatives for this improved project is attached. Per 44 CFR 9.11 alternatives were reviewed. Per 44 CFR 9.11(d) (9), the replacement of building contents, materials and equipment, where possible, disaster proofing of the building and/or elimination of such future losses by relocation of those building contents, materials and equipment to or above the base flood plain. FEMA will publish a cumulative final notice for all proposed Alternative Arrangement projects in a floodplain. A website will be provided for project specific information as required per 44 CFR 9.12.
- If required by LDEQ, the applicant shall require its contractor to prepare, certify, and implement a construction storm water pollution prevention plan to prevent sediment and construction material transport from the sites (regulated under NPDES Program, Section 402). A Louisiana Pollution Discharge Elimination System (LAPDES) permit will be required in accordance with the CWA and the Louisiana Clean Water Code. All coordination pertaining to these activities should be documented and copies forwarded to the state and FEMA as part of the permanent project files.
- 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. Failure to comply with these stipulations may jeopardize receipt of FEMA funding.