

PA-06-LA-4080-PW/01456(0) P	
Applicant Name:	Application Title:
OFFICE OF COASTAL PROTECTION AND RESTORATION	CCP032A CPRA WATERWAY DEBRIS - St. Bernard
Period of Performance Start:	Period of Performance End:
08-29-2012	02-28-2013

Bundle Reference # (Amendment #)	Date Awarded

Subgrant Application - FEMA Form 90-91

Note: The Effective Cost Share for this application is 75%

FEDERAL EMERGENCY MANAGEMENT AGENCY PROJECT WORKSHEET						
DISASTER		PROJECT NO.	PA ID NO.	DATE	CATEGORY	
FEMA	4080	- DR -LA	CCP0XXA	000-UTFMG-00	04-26-2013	A
APPLICANT: OFFICE OF COASTAL PROTECTION AND RESTORATION				WORK COMPLETE AS OF:		
				04-25-2013 : 0 %		
Site 1 of 3						
DAMAGED FACILITY:			COUNTY: St. Bernard			
CPRA - ST. BERNARD WATERWAY DEBRIS - SUMMARY						
LOCATION:			LATITUDE:	LONGITUDE:		
Current Version:			30.45119	-91.16439		
APPLICANTS OFFICES ARE LOCATED AT 450 LAUREL ST 15TH FLOOR BATON ROUGE, LA 70801						
DAMAGE DESCRIPTION AND DIMENSIONS:						
Current Version:						
PREFACE:						
This Project Worksheet is being written in response to an April 14, 2013 email request from Mr. Leo Richardson of the Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP). The Coastal Protection and Restoration Authority (CPRA) is the applicant and the request involves removal of claimed hazardous waterway debris, i.e. 90 CY of vegetative, 40 CY of C&D, 157 vessels, and 114 commercial cargo containers at 32 site locations that are claimed to be an immediate and imminent threat to public health and safety from the following five canals:						
<ol style="list-style-type: none"> 1. Bayou Terre aux Boeufs (6.5 mi), located in St. Bernard Parish 2. Bayou Leary (1 mi), located in St. Bernard Parish 3. Bayou Gentilly (3.5 mi), located in Plaquemines Parish 4. Bayou LaLoutre (6.5 mi), located in St. Bernard Parish 5. Bayou Yscloskey (1.25 mi), located in St. Bernard Parish 						
A FEMA/State joint site inspection was conducted on April 23, 2013. Those in attendance included Mr. Leo Richardson of GOHSEP and FEMA representatives. FEMA informed GOHSEP that on the advice of FEMA counsel, site inspections of Bayous LaLoutre and Yscloskey would be postponed until a later date. This is due to both waterways being the subject of an ongoing Hurricane Katrina arbitration case concerning waterway debris and sediment removal.						
FEMA field staff, along with GOHSEP (applicant), performed site inspections on two of the five waterways identified in the request, Bayous Terre aux Boeufs and Leary. No eligible debris sites were identified by FEMA on Bayou Gentilly as it was not shown to FEMA during this site visit. The inspection team was shown a total of 32 debris sites located on numerous waterways in St. Bernard Parish. The debris consisted primarily of wrecked, abandoned, or submerged vessels and C&D debris. Some of the debris was visible on the surface, and others were submerged. The claim does not request nor address sediment removal.						
The initial claim requesting waterway debris removal associated with Hurricane Isaac was forwarded internally within GOHSEP on September 18, 2012; however, FEMA has no record of receiving this request until April 3, 2013 (exhibit 1). FEMA will acknowledge receipt of the applicant's request for federal funding reimbursement to remove debris from the five claimed and identified state owned waterways						

described above on September 18, 2012, even though there is no documentation to verify receipt until April of 2013.

A total of 32 debris sites were identified during the field inspection. Eleven (11) of these 32 debris sites were located on two of the three remaining bayous (Bayous Leary and Terre aux Boeufs) as previously identified in the applicants 2012 claim (no debris sites were recorded from the two bayous involved in arbitration (Bayous LaLoutre and Yscloskey)). There were 21 additional debris sites that were presented to FEMA by the applicant in the waterways the day of the site visit that were not previously identified in the original 2012 claim listing of identified debris locations until the date of the field inspection, April 23, 2013. These 21 additional debris sites "identified" are outside of the Stafford Act guidelines of 60 days to identify damages and present to FEMA. Per 44 CFR 206.202 "Application Procedures", Section (d)(ii), "The applicant will have 60 days following its first substantive meeting with FEMA to identify and to report damages to FEMA." Other than the five waterways identified to FEMA in September 2012, the applicants notification of intent to file a damage claim for all the other waterways shown to the inspection team was given well beyond the 60 days allowed by the Stafford Act. Because these additional claims were submitted outside the timeframe provided by regulation, FEMA will not consider funding any debris removal from waterways other than the initial five listed above.

This PW will evaluate the State's claim for the five waterways submitted within the timeframe allowed by the guidelines within the Stafford Act; 44 CFR 206.202; 206.204; and 206.206(c). Due to the pending arbitration case, the current analysis considers three of the five claimed waterways, Bayous Lery, Gentilly and Terre aux Boeufs.

Although the field inspection identified waterway debris in two of the three canals inspected and requested in the allowable timeframe that could be considered a hazard to navigation, the applicant did not provide any evidence that these obstructions were a result of the event. No pre-event maintenance records or surveys were provided that would demonstrate these obstructions were not present prior to Isaac. 44 CFR, 206.223 (a) (1) requires an item of work "Be required as the result of the emergency or major disaster event." The applicant has not demonstrated the debris removal is a result of Hurricane Isaac; therefore, the work is not eligible for PA Program funding.

FEMA has determined in previous events that many of the waterways in this area are Federal navigation channels. Specifically, many of these canals were constructed with federal appropriations derived from "the River and Harbor Act of 1899 which authorizes the United States Army Corps of Engineers (USACE) to remove sunken vessels or other obstructions from navigable waterways under emergency conditions. A navigable waterway is one that has been authorized by Congress, and which USACE operates and maintains for general (including commercial and recreational) navigation. The USACE has primary responsibility for the removal of debris from Federally maintained navigable waterways. The removal of wreckage and sunken vessels from Federally maintained navigable channels and waterways is ineligible." (FEMA Recovery Policy 9523.5, Debris Removal from Waterways.) Therefore, this work would be ineligible for PA funding for any Federal navigation channel.

44 CFR 206.224 requires debris removal to be in the public interest to be eligible for assistance. This requires in part that the "removal of disaster generated debris from a navigable waterway be cost effective. Debris removal is cost effective if the cost to remove the debris is less than the cost of potential damage to improved property." (RP9523.5(B),(1)(b)) The applicant has not provided any support that the potential cost of damage to improved property would exceed the cost to remove the debris.

Conclusion

The applicant notified FEMA of their intent to request PA funding for debris removal in five waterways within the time allowed by regulation to report damage. The applicant has not provided any evidence that the work is required by the declared event or that it is cost effective and in the public interest. In addition, the work in some of the canals is the specific authority of the USACE. All of the requested work and associated costs are ineligible for PA funding.

Any request for reconsideration must at a minimum provide adequate responses to the ineligible determinations described in this PW.

The applicant has identified debris in the following Bayous and Canals located in St. Bernard Parish, LA, under the jurisdiction of the Office of Coastal Protection and Restoration.

Bayou Terre aux Boeufs – 6.5 miles
 Bayou Lery – 1 mile
 Bayou Gentilly – 3.5 miles
 Bayou LaLoutre – 6.5 miles
 Bayou Yscloskey – 1.25 miles

The specific locations of the debris, each site denoted with a bullet, are:

Bayou Terre aux Boeufs (State Waterway)

- Site 1 – (inspection 18) – vessel (photo 22) (29.76422, -89.79210)
- Site 2 – (inspection 19) – tied off half sunken vessel (photo 23) (29.76530, -89.79210)
- Site 3 – (inspected from roadside) Starting GPS (29.83729, -89.75568)/Ending GPS (29.82419, -89.75687). C&D debris, wooden planks and pylons, tanks, vegetative debris, and trash. (photos 64 to 74) Estimated 100 CYs.
- Site 4 – (inspected from roadside) Starting GPS (29.83871, -89.75683)/Ending GPS (29.85924, -89.77522). C&D debris, wooden planks and pylons, tanks, vegetative debris, and trash. (photos 75 to 90) Estimated 100 CYs.

Along Bayou Terre Aux Boeufs, it appears as though a utility or gas company has built an earthen bridge spanning the Bayou in order to access equipment on the other side. It is unknown if this is a temporary or permanent bridge, but it had a single small culvert, approximately 24 in, and was wide enough for a vehicle to pass over. On one side wood pylons had been driven to prevent damage to the bridge or blocking of the culvert by debris. If this was a permanent structure, it would prevent access to one side of the bayou, making it no longer a navigable waterway. We could not determine which side would no longer have access, and the applicant could not provide that information.

Bayou Lery

- Site 5 – (inspection 20) – estimated 10 CY C&D (29.77656, -89.78631)
- Site 6 – (inspection 21) – half sunken vessels (photo 24) (29.77656, -89.78631)
- Site 7 – (inspection 22) – sunken fiberglass boat (photo 25) (29.77604, -89.78574)
- Site 8 – (inspection 23) – tandem axel trailer (photo 26, partially submerged, tire is on left side of photo sticking out of water) (29.77578, -89.87555)
- Site 9 – (inspection 24) – 10 CY C&D, 1 white good (photo 27) (29.77379, -89.78490)
- Site 10 – (inspection 25) – sunken trailer (not visible) (29.79738, -89.80575)
- Site 11 – (inspection 26) – sunken vessel (not visible, "Zone 121") (29.81395, -89.83310)

Bayou Gentilly

• Bayou Gentilly was never identified to the FEMA inspection team during the site inspections, however, the following sites were shown to the inspectors:

- "Joe's Canal" (Parish Waterway)
 - o Site 12 – (inspection 1) – possible sunken vessel, estimated 18ft (not visible) (29.83641, -89.68896)
 - o Site 13 – (inspection 2) – 6ft creosote piling (photo 1) (29.83554, -89.68922)
 - o Site 14 – (inspection 3) – possible sunken vessel, estimated 8ft (not visible) (29.82439, -89.68696)
- Dudenheffer Canal (Parish Waterway). We inspected 7 sites:
 - o Site 15 (inspection 4) – plastic rowboat (photo 2) (29.81602, -89.67030)
 - o Site 16 – (inspection 5) – (2) sunken vessels (photos 3 and 4) (29.81577, -89.66992)
 - o Site 17 – (inspection 6) – Tupperware totes (photos 5 and 6) (29.81597, -89.67010)
 - o Site 18 – (inspection 7) – submerged wooden boat (photo 7) (29.81560, -89.66972)
 - o Site 19 – (inspection 8) – old sunken shrimp vessels (photos 8, 9, 10) (29.81427, -89.66859)
 - o Site 20 – (inspection 9) – 10 ft fiberglass boat (photos 11 and 12) (29.81657, -89.67094)
 - o Site 21 – (inspection 10) – sunken fiberglass vessel (photo 13) (29.81677, -89.70540)
- (Adjacent to) Bayou Juanita (Parish Waterway).
 - o Site 22 – (inspection 11) – sunken fiberglass vessel, est. 10 to 12 ft (photo 14) (29.82296, -89.71617)
 - o Site 23 – (inspection 12) – metal container (photo 15) (29.82321, -89.73917)
 - o Site 24 – (inspection 13) – metal container (photo 16, visible in the photo are the two "ends" on the container, the floor section is submerged, the walls and top are gone. This is a large container as used for shipping or on railways.) (29.82423, -89.74457)
 - o Site 25 – (inspection 14) – metal shipping container (photo 17, visible in the photo are the two "ends" on the container, the floor section is submerged, the walls and top are gone. This is a large container as used for shipping or on railways.) (29.82185, -89.74928)
 - o Site 26 – (inspection 15) – "Chiquita" tractor trailer (photos 18 and 19, photo 19 attempts to show submerged portion of trailer, but it is not visible in photo) (29.84990, -89.74735)
- Reggio Canal (Parish Waterway).
 - o Site 27 – (inspection 16) – metal "wall"/ scrap (photo 20) (29.82153, -89.75116)
 - o Site 28 – (inspection 17) – fiberglass boat, est. 13 ft (photo 21) (29.81818, -89.75863)
- Bayou Robin (State Waterway).
 - o Site 29 – (inspection 27) – unidentified submerged debris, zone 142 (not visible) (29.74970, -89.68430)
 - o Site 30 – (inspection 28) – sunken vessel "crew boat", the applicant's representative indicated this vessel may be covered in a project written for Hurricane Katrina (photo 28) (29.77202, -89.69370)
 - o Site 31 – (inspection 29) – sunken vessel, zone 142 (photo 29) (29.78042, -89.69024)
 - o Site 32 – (inspection 30) – metal container, shipping container or possibly tractor trailer (photo 30) (29.79525, -89.69422)

Bayou LaLoutre

- Unable to inspect or address due to pending arbitration

Bayou Yscloskey

- Unable to inspect or address due to pending arbitration

SCOPE OF WORK:**Current Version:****WORK TO BE COMPLETED:**

Please see individual site sheets for a detailed summary of damage description and scope of work.

The Applicant will, through State procurement laws of public bidding, award a contract to remove debris from the following Sites:

Bayou Terre aux Boeufs – 6.5 miles

Bayou Lery – 1 mile

No eligible debris sites were identified on Bayou Gentilly as this waterway was not shown to the FEMA inspection team. Instead, the applicant presented the following waterways to FEMA: "Joe's Canal", a.k.a Dudenheffer Canal, Bayou Jaunita, Reggio Canal, and Bayou Robin and claimed as identified damages directly caused by Hurricane Isaac to FEMA on 4/23/13. These waterways were not previously identified as the original 7 waterways and these identified damaged sites were presented to FEMA beyond the applicant's 60 days for identifying damages, per 44 CFR 206.202; and FEMA 322, these damages are not eligible for reimbursement.

Both Bayou LaLoutre and Bayou Yscloskey are currently under arbitration and could not be inspected or discussed, and are not addressed in this Project Worksheet.

There are pertinent issues of eligibility which contradict FEMA Disaster Assistant Policy as follows:

44 CFR § 206.223 General Work Eligibility (page 460)

(2) General. To be eligible for financial assistance, an item of work must:

(1) Be required as the result of the emergency or major disaster event;

And per the FEMA PA Guide, page 29:

"Direct Result. Work must be required as a direct result of the declared major disaster or emergency. The declaration by the President will designate the event, such as a severe storm, tornado, or flood, for which the declaration is being made. Damage that results from a cause other than the designated event, such as a pre-disaster damaging event, post-disaster damaging event, or work to correct inadequacies that existed prior to the disaster, is not eligible. Damage caused during the performance of eligible work may be eligible."

Maintenance records have been requested by FEMA for the waterways covered in this PW, but they have not been provided. FEMA therefore cannot verify that the debris claimed in this PW is a direct result of Hurricane Isaac.

This Project Specialist recommends that the debris removal operation described in this scope of work be made not eligible for FEMA funding due to the fact that the applicant has not demonstrated the debris is a direct result of Hurricane Isaac; has not provided maintenance records for waterway debris removal; has not provided any force account information to support this subgrant application

request.

Also, the applicant's kickoff meeting took place on 9/13/2012. "Joe's Canal", Dudenheffer Canal, Bayou Jaunita, Reggio Canal, and Bayou Robin were not identified to FEMA until 4/23/2013. Per the FEMA PA Guide, page 96, "An applicant has 60 days following the first substantive meeting, usually the Kickoff Meeting, with FEMA to identify and report damaged facilities to FEMA." (44 CFR §206.202(d)(ii)) Their 60 day deadline for identifying damages was 11/12/2012, therefore this Project Specialist recommends that the costs for debris removal operations at these sites be made not eligible for FEMA funding.

No cost estimate has been provided by the Applicant. FEMA estimates the cost for debris removal, including collection, removal, and disposal, and including all ancillary costs such as monitoring and disposal fees, to be \$4,808.00 per site. This estimate is based on local historical costs; specifically a quoted contract estimate for removal of a vessel ("Lady Susan") in PW#00728 (PW ref. no. DOT014A). Total project Costs are estimated to be \$4,808.00/Site x 32 sites = \$153,856.00.

Total project Ineligible Costs are estimated to be -\$4,808.00/Site x 32 sites = -\$153,856.00.

NOTE: *The Applicant must obtain all required Federal, State and local permits prior to the commencement of work.

NOTE: *No mitigation opportunities have been identified. This project worksheet is for emergency work only; Therefore Mitigation is not eligible.

NOTE: *Per FEMA 321 Policy Digest, page 29, "Disposition of Debris Salvage must be at fair market value and the value must be reimbursed to FEMA at the end of the project to reduce the total project cost.", and FEMA policy 9525.12, "Disposition of Salvageable Materials - Sub grantees must dispose of salvageable materials at a fair market value and the revenue must be cost shared with FEMA. The Federal cost share in disposition and salvage revenue is the same as its participation in the original cost. Disasters often result in large amounts of debris that may have a market value. With the exception noted in VII. C(2), revenue from debris must be used to reduce the project cost. Some of the materials that can be expected to be marketable are timber debris, mulched debris, and scrap metals."

NOTE: * DAP9525.9 provides guidance on the eligibility of administrative costs. The policy states that FEMA will reimburse DAC that are "properly documented and directly chargeable on a PW for a specific project. Actual costs must be reasonable for the work performed and accounted for in accordance with 44 CFR §13.22 – Allowable Costs." The policy also states that DAC include "costs that can be tracked, charged, and accounted for directly to a specific project ... [and] are limited to actual reasonable costs incurred for a specific project."

Throughout the policy, it is clear that DAC must be in compliance with §13.22, and by extension, A-87, and that the costs must be reasonable and properly documented in order to qualify for reimbursement. Such costs cannot be assumed reasonable if the costs are not directly tied to a PW and tracked and documented in such a way that FEMA staff can determine whether or not they are reasonable.

RECORD RETENTION: Complete records and cost documents for all approved work must be maintained for at least 3 years from the date the last project was completed or from the date final payment was received, whichever is later.

PROCUREMENT: If applicable to this project, The applicant is required to adhere to State Government Procurement rules and regulations and maintain adequate records to support the basis for all purchasing of goods and materials and contracting services for projects approved under the Public Assistance program, as stated in 44 CFR 13.36. The applicant has advised they have/will follow their normal procurement procedures.

Site 2 of 3

DAMAGED FACILITY:

Site 1- Vegetative Debris & C&D

COUNTY: St. Bernard

LOCATION:

Current Version:

St. Bernard Parish Waterways
St. Bernard Parish, LA

LATITUDE:

LONGITUDE:

DAMAGE DESCRIPTION AND DIMENSIONS:

Current Version:

This Project Worksheet is being written in response to an April 14, 2013 email request from Mr. Leo Richardson of the Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP). The Coastal Protection and Restoration Authority (CPRA) is the applicant and the request involves removal of claimed 130 CY of hazardous waterway debris, i.e. 90 CY of vegetative, 40 CY of C&D, 157 vessels, 1 piece of creosote timber, 3 pieces of white goods, 2 boat trailer frames, and 114 cargo containers that are claimed to be an immediate and imminent threat to public health and safety from the following five canals:

1. Bayou Terre aux Boeufs (6.5 mi), located in St. Bernard Parish
2. Bayou Leary (1 mi), located in St. Bernard Parish
3. Bayou Gentilly (3.5 mi), located in Plaquemines Parish
4. Bayou LaLoutre (6.5 mi), located in St. Bernard Parish
5. Bayou Yscloskey (1.25 mi), located in St. Bernard Parish

The removal and disposal of this debris is necessary to eliminate immediate threats to public health and safety, damage to improved public or private property, and to ensure continued economic recovery of the Office of Coastal Protection and Restoration.

SCOPE OF WORK:

Current Version:

SCOPE OF WORK
WORK TO BE COMPLETED

THIS ZERO SUBGRANT APPLICATION IS WRITTEN FOR INELIGIBLE DEBRIS:

FEMA conducted site assessments, in conjunction with GOHSEP, and CPRA representatives on the claimed five waterways on April 23,

2013. The applicant, Office of Coastal Protection and Restoration (CPRA), was informed by FEMA counsel that no assessments will be performed on Bayous LeLoutre and Yscloskey, for they are part of an ongoing arbitration case for Hurricane Katrina (see attached letter). Therefore, the following waterway debris quantities: 130 CY vegetative and C&D; 3 white goods; 2 boat trailer frames; and 1 creosote timber of hazardous containing materials claimed as a direct result of Hurricane Isaac in the five (5) identified canals/waterways are deemed to be ineligible based on the the following: inability of the applicant to associate the observed objects as directly caused by Hurricane Isaac; the applicants lack of maintenance records for removing debris from waterways as a routine maintenance program; and the applicant has not provided a unit cost per item or waterway debris removal estimated cost to FEMA for this subgrant application request. This subgrant application for vegetative, C&D, white goods, boat trailer frames, and creosote timber containing hazardous materials is written for zero dollars.

NOTE: *If applicable to this project, the Applicant is required to adhere to State Government Procurement rules and regulations and maintain adequate records to support the basis for all purchasing of goods and materials and contracting services for projects approved under the Public Assistance program, as stated in 44 CFR 13.36. The Applicant has advised they have/will follow their normal procurement procedures.

NOTE: *The Applicant must obtain all required Federal, State, and local permits associated to the scope of work defined in this subgrant application prior to the commencement of work.

NOTE: *No mitigation opportunities have been identified. This project worksheet is for emergency work only; Therefore Mitigation is not eligible.

NOTE: *The Project Specialist has reviewed all documentation submitted by the applicant for debris referred to in this project and has determined all debris referred to in this project is the responsibility of the applicant and will be removed from the applicants public right of way(s)only.

NOTE: *The Direct Administrative costs will be addressed in a future version of the Project worksheet.

NOTE: *Complete records and cost documents for all approved work must be maintained for at least 3 years from the date the last project was completed or from the date final payment was received, whichever is later.

RECORD RETENTION: Complete records and cost documents for all approved work must be maintained for at least 3 years from the date the last project was completed or from the date final payment was received, whichever is later.

DOCUMENTATION REVIEW: A 20% or more sampling of documentation will be reviewed/validated when and/if submitted by the applicant to FEMA for fair and reasonable cost as it pertains to this subgrant application request. If applicable, copies of the applicant's pertinent pre-disaster policies, invoices, cancelled checks (or other proofs of payment), maintenance records, and payroll data will be reviewed.

PROCUREMENT: If applicable to this project, the applicant is required to adhere to State Government Procurement rules and regulations and maintain adequate records to support the basis for all purchasing of goods and materials and contracting services for projects approved under the Public Assistance program, as stated in 44 CFR 13.36. The applicant has advised they have/will follow their normal procurement procedures.

Site 3 of 3

DAMAGED FACILITY:

COUNTY: Statewide

Site 2-Vessels

LOCATION:

LATITUDE:

LONGITUDE:

Current Version:

St. Bernard Parish Waterways
St. Bernard Parish, LA

DAMAGE DESCRIPTION AND DIMENSIONS:

Current Version:

PREFACE:

This Project Worksheet is being written in response to an April 14, 2013 email request from Mr. Leo Richardson of the Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP). The Coastal Protection and Restoration Authority (CPRA) is the applicant and the request involves removal of claimed hazardous waterway debris, i.e. 157 vessels, and 114 commercial cargo containers that is claimed to be an immediate and imminent threat to public health and safety from the following five canals:

1. Bayou Terre aux Boeufs (6.5 mi), located in St. Bernard Parish
2. Bayou Leary (1 mi), located in St. Bernard Parish
3. Bayou Gentilly (3.5 mi), located in Plaquemines Parish
4. Bayou LaLoutre (6.5 mi), located in St. Bernard Parish
5. Bayou Yscloskey (1.25 mi), located in St. Bernard Parish

The removal and disposal of this debris is necessary to eliminate immediate threats to public health and safety, damage to improved public or private property, and to ensure continued economic recovery of the Office of Coastal Protection and Restoration.

SCOPE OF WORK:

Current Version:

**SCOPE OF WORK
WORK TO BE COMPLETED
THIS ZERO SUBGRANT APPLICATION IS WRITTEN FOR INELIGIBLE DEBRIS:**

FEMA conducted site assessments, in conjunction with GOHSEP, and CPRA representatives on the claimed five waterways. The applicant, Office of Coastal Protection and Restoration (CPRA), was informed by FEMA counsel that no assessments will be performed on Bayous LeLoutre and Yscloskey, for they are part of an ongoing arbitration case for Hurricane Katrina (see attached letter). Therefore, the 114 containers and 157 vessels claimed as debris as a direct result of Hurricane Isaac are deemed to be ineligible based on the following: inability of the applicant to associate the observed objects as directly caused by Hurricane Isaac; the applicants lack of maintenance records for removing debris from waterways as a routine maintenance program; no unit cost per item or waterway debris removal estimated costs provided to FEMA per this subgrant application request. This subgrant application for containers and vessels debris removal is written for zero dollars to avoid any conflict with the waterway debris arbitration case (see back-up spreadsheet with GPS locations of all identified debris claimed).

NOTE: *If applicable to this project, the Applicant is required to adhere to State Government Procurement rules and regulations and maintain adequate records to support the basis for all purchasing of goods and materials and contracting services for projects approved under the Public Assistance program, as stated in 44 CFR 13.36. The Applicant has advised they have/will follow their normal procurement procedures.

NOTE: *The Applicant must obtain all required Federal, State, and local permits as defined by the scope of work in this subgrant application request prior to the commencement of work.

NOTE: *No mitigation opportunities have been identified. This project worksheet is for emergency work only; therefore Mitigation is not eligible.

NOTE: *The Project Specialist has reviewed documentation submitted by the applicant for the debris referred to in this subgrant application and has determined all debris referred to in this project is the responsibility of the applicant and will be removed from the applicants public right of way(s) only.

NOTE: *The Direct Administrative costs will be addressed in a future version of the Project worksheet.

NOTE: *Complete records and cost documents for all approved work must be maintained for at least 3 years from the date the last project was completed or from the date final payment was received, whichever is later.

RECORD RETENTION: Complete records and cost documents for all approved work must be maintained for at least 3 years from the date the last project was completed or from the date final payment was received, whichever is later.

DOCUMENTATION REVIEW: A 20% or more sampling of documentation will be reviewed/validated when and/if submitted by the applicant to FEMA for fair and reasonable cost as it pertains to this subgrant application request. If applicable, copies of the applicant's pertinent pre-disaster policies, invoices, cancelled checks (or other proofs of payment), maintenance records, and payroll data will be reviewed.

PROCUREMENT: If applicable to this project, The applicant is required to adhere to State Government Procurement rules and regulations and maintain adequate records to support the basis for all purchasing of goods and materials and contracting services for projects approved under the Public Assistance program, as stated in 44 CFR 13.36. The applicant has advised they have/will follow their normal procurement procedures.

Does the Scope of Work change the pre-disaster conditions at the site? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Special Considerations included? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Hazard Mitigation proposal included? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Is there insurance coverage on this facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

PROJECT COST

ITEM	CODE	NARRATIVE	QUANTITY/UNIT	UNIT PRICE	COST
1	0000	Work to be Completed - site 1	0/EA	\$ 0.00	\$ 0.00
2	9001	Contract	1/LS	\$ 153,856.00	\$ 153,856.00
3	9999	ineligible work	1/LS	\$ -153,856.00	\$ -153,856.00
TOTAL COST					\$ 0.00
PREPARED BY WILLIAM ANDREWS			TITLE FEMA PROJECT SPECIALIST		SIGNATURE
APPLICANT REP. JANICE LANSING			TITLE CHIEF FINANCIAL OFFICER		SIGNATURE