Region 9

Environmental and Historic Preservation (EHP) Guidelines for FEMA Grant Applications

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FEMA

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Introduction

The Federal Emergency Management Agency (FEMA) is required by law to review all grant projects to determine effects on the environment. Projects that may result in any physical impacts to the environment, cultural resources, or sensitive species require an in-depth environmental review, for which applicants need to provide more information. **While these guidelines are as specific as possible, additional information, studies, design plans, agency coordination and consultation letters, etc., may be needed on a case-by-case basis, depending on the project's specific scope of work and location.** These items will help FEMA determine the potential for proposed projects to affect natural and cultural resources, such as species and critical habitats, migratory birds, floodplains, wetlands, water and air quality, archaeological and historic resources, and viewsheds. Projects that will not result in any physical change to the environment do not require an in-depth environmental review. Such projects include the development of Mitigation Plans, public education and training activities, weather radios, and Phase I feasibility studies and assessments. For these projects, a detailed scope of work explaining the activity should be sufficient for FEMA to complete the environmental review.

Note: Applicants and Sub-applicants should not consult directly with the State Historic Preservation Office (SHPO)/ Tribal Historic Preservation Office (THPO). In most cases, FEMA will consult with SHPO/THPO directly as needed on receipt of a complete application. Neither should Applicants and Sub-applicants consult directly with federally recognized tribes. FEMA will consult with tribes directly as needed during the project review process.

Some projects take place in or near areas that support sensitive natural resources, including threatened and endangered fish, wildlife, plants, and critical habitats for threatened or endangered species. All FEMA-funded programs and activities must comply with the Endangered Species Act (ESA). Section 7 of the ESA requires FEMA to evaluate its actions for effects to listed species and critical habitats and to consult with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) (the Services) for any effects likely to occur.

Projects in or impacting a floodplain will require a determination of whether the project will have negative upstream or downstream impacts. To make this determination, FEMA may request a Hydrologic and Hydraulic (H&H) Study. Projects within a mapped or undesignated floodway are subject to the conditions found in 44 CFR 9.11(4).

Table 1 summarizes details needed to review the various project types without unnecessary delays. These same details are found in the body of this guide.

Table 1. Scope of Work Details to Include by Project Type

Project Type	SOW Details Needed	GPS coordinates and address	Dates of construction for all structures	Photos of structures >45 yrs old	Design plans, maps, drawings, photos	Ground disturbance details	Current and proposed foundation type	Current and proposed elevation heights	Elevation project specific details	Projects in floodplain: full details	Work in water, stream etc.: full details	Road/bridge elevation specific details	Property/right of way acquisition details	Biological surveys, site assessment, etc.	Relocation Specific details	New footprint details	Work location in relation to building	Access roads, parking lots, utilities	Generator specific details	Warning system specific details	Vegetation management details
1. Acquisition and Demolition (p6)	☐	☐	☐	☐																	
2. Building Elevation (p6)	☐	☐	☐	☐	☐	☐	☐	☐	☐												
3. Road/Bridge Elevation (p6)	☐	☐	☐	☐	☐		☐			☐	☐	☐	☐								
4. Relocation (p8)	☐	☐	☐	☐	☐									☐							
5. Mitigation Reconstruction (p8)	☐	☐	☐	☐	☐	☐	☐		☐						☐						
6. Facility Improvement/Retrofit (p9)	☐	☐	☐	☐	☐										☐	☐					
7. Drainage and Channelization (p9)	☐	☐	☐	☐	☐					☐		☐	☐								☐
8. Bank Stabilization (p11)	☐	☐	☐	☐	☐							☐	☐								☐
9. Generators (p12)	☐	☐	☐	☐	☐				☐						☐	☐			☐		
10. Warning Systems (p12)	☐	☐	☐	☐	☐															☐	☐
11. Community Safe Rooms (p13)	☐	☐	☐	☐	☐				☐					☐			☐				
12. Individual Safe Rooms (p14)	☐	☐	☐	☐	☐				☐					☐			☐				
13. Wildfire Mitigation (p14)	☐	☐	☐	☐	☐							☐	☐								☐

Additional Scope of Work Details to Include by Project Type

1. Acquisition and Demolition Projects

- ☐ GPS coordinates (latitude and longitude in decimal degrees) and address of project site(s), including alternate properties. If there are multiple locations, include an electronic spreadsheet (e.g. Excel or csv file) with addresses and GPS coordinates.
- ☐ Date(s) of construction for all structure(s) in the project area, including alternate properties.
- ☐ Photos of all structures in the project area that are 45 years old or older. Photos should be submitted digitally following the guidance in Appendix A.
- ☐ When feasible, provide design plans, maps, drawings, photos, etc. to illustrate work to be completed

2. Building Elevation Projects

- ☐ GPS coordinates (latitude and longitude in decimal degrees) and address of project site(s), including alternate properties. If there are multiple locations, include an electronic spreadsheet (e.g. Excel or csv file) with addresses and GPS coordinates.
- ☐ Date(s) of construction for all structure(s) in the project area, including alternate properties.
- ☐ Photos of all structures in the project area that are 45 years old or older. Photos should be submitted digitally following the guidance in Appendix A.
- ☐ Describe the current and proposed foundation type.
- ☐ Current and proposed building elevation heights.
- ☐ Describe dimensions, acreage, and depth of any ground-disturbance; include GPS coordinates.
- ☐ Will the structure be elevated in place? How will it be elevated? E.g., crib/jack; on fill; 2nd story conversion, etc.
- ☐ If the structure will be removed from the foundation and temporarily stored to install a new foundation: where will the structure be stored and how will it be transported?
- ☐ When feasible, provide design plans, maps, drawings, photos, etc. to illustrate work to be completed.

3. Road/Bridge Elevation Projects

- ☐ Start and end GPS coordinates (latitude and longitude in decimal degrees) for project site(s). If there are multiple locations, include an electronic spreadsheet (e.g. Excel or csv file) with GPS coordinates.

- ☐ Date(s) of construction for all facilities such as culverts and bridges in the project area.
- ☐ Current and proposed elevation heights.
- ☐ Describe dimensions, acreage, and depth of any ground-disturbance; include GPS coordinates.
- ☐ Describe any temporary access roads and staging areas that would be required, including GPS coordinates. Will they require ground disturbance?
- ☐ Describe impacts to traffic.
- ☐ If stream work is involved:
    - ☐ Is the current stream natural or altered by human-made structures (dams, weirs, concrete lining, culverts, riprap, etc.)?
    - ☐ What length of natural channel will be modified and what are the modifications?
    - ☐ If the channel is already modified, what additional improvements are proposed?
    - ☐ Are any streams being rerouted? Explain in detail the location and mechanisms for achieving this.
- ☐ Describe any current or proposed bank stabilization measures. FEMA recommends incorporating bioengineering techniques (the use of living and non-living vegetation combined with natural and synthetic support materials).
- ☐ What is the capacity of any existing waterway system within the area of impact and what will be the capacity of the proposed new system?
- ☐ Will property or right(s)-of-way need to be acquired for the project? If so, who owns the property and are they a willing seller? Are there deed restrictions or easements on that land?
- ☐ When feasible, provide design plans, maps, drawings, photos, etc. to illustrate work to be completed.
- ☐ Provide the proposed work schedule (e.g. date range, months, seasons), if known.
- ☐ If available, provide biological surveys, site assessments, or other studies that may assist in environmental review.
- ☐ Photos of all structures in the project area that are 45 years old or older. Photos should be submitted digitally following the guidance in Appendix A.

If the project takes place within a floodplain:

- ☐ Projects within a mapped floodway or an undesignated floodway are subject to the conditions found in 44 CFR 9.11(4).

4. Relocation Projects

- ☐ GPS coordinates (latitude and longitude in decimal degrees) and address of project site(s), including alternate properties. If there are multiple locations, include an electronic spreadsheet (e.g. Excel or csv file) with addresses and GPS coordinates.
    - ☐ Provide this information for both the existing site and the proposed new site.
- ☐ Date(s) of construction for all structure(s) in the project area, including alternate properties.
- ☐ Past site use of the proposed new site (e.g., urban, residential, industrial, agricultural, etc.).
    - ☐ Include any site assessments of proposed relocation areas if available.
- ☐ Describe dimensions, acreage, and depth of any ground-disturbance; include GPS coordinates.
- ☐ Will the structure be temporarily stored somewhere other than its existing location?
- ☐ How will it be transported to the proposed new site?
- ☐ When feasible, provide design plans, maps, drawings, photos, etc. to illustrate work to be completed.
- ☐ Photos of all structures in the project area that are 45 years old or older. Photos should be submitted digitally following the guidance in Appendix A.

5. Mitigation Reconstruction Projects

- ☐ GPS coordinates (latitude and longitude in decimal degrees) and address of project site(s), including alternate properties. If there are multiple locations, include an electronic spreadsheet (e.g. Excel or csv file) with addresses and GPS coordinates.
- ☐ Date(s) of construction for all structure(s) in the project area, including alternate properties.
- ☐ Describe the current and proposed foundation type.
- ☐ Current and proposed building elevation heights.
- ☐ Describe dimensions, acreage, and depth of any ground-disturbance; include GPS coordinates.
- ☐ Confirm, per program requirements, the new structure will be built on the same footprint as the previous structure.
- ☐ Previous footprint square footage and proposed footprint square footage.
- ☐ When feasible, provide design plans, maps, drawings, photos, etc. to illustrate work to be completed.
- ☐ Photos of all structures in the project area that are 45 years old or older. Photos should be submitted digitally following the guidance in Appendix A.

6. Facility Improvement and Retrofit Projects

- ☐ GPS coordinates (latitude and longitude in decimal degrees) and address of project site(s), including alternate properties. If there are multiple locations, include an electronic spreadsheet (e.g. Excel or csv file) with addresses and GPS coordinates.
- ☐ Date(s) of construction for all structure(s) in the project area, including alternate properties.
- ☐ Will improvements require going beyond the original footprint of the existing structure?
- ☐ Describe dimensions, acreage, and depth of any ground-disturbance; include GPS coordinates.
- ☐ Indicate locations of work in relation to the building:
    - ☐ Inside, outside, on top, below, etc.
- ☐ When feasible, provide design plans, maps, drawings, photos, etc. to illustrate work to be completed.
- ☐ Photos of all structures in the project area that are 45 years old or older. Photos should be submitted digitally following the guidance in Appendix A.

7. Drainage and Channelization Projects

- ☐ GPS coordinates (latitude and longitude in decimal degrees) and address of project site(s), including staging areas, temporary access roads, and alternate properties. If there are multiple locations, include an electronic spreadsheet (e.g. Excel or csv file) with addresses and GPS coordinates.
- ☐ Date(s) of construction for existing drainage structures and/or bridges affected.
- ☐ Is the project an upgrade to an existing system, or does it involve the installation of a new drainage system?
    - ☐ Describe any drainage that is already in place in the project area (e.g. ditches, curb and gutters, sewers and/or storm drains, pumps, etc.).
- ☐ If stream work is involved:
    - ☐ Is the current stream natural or altered by human-made structures (dams, weirs, concrete lining, culverts, riprap, etc.)?
    - ☐ What length of natural channel will be modified and what are the modifications?
    - ☐ If the channel is already modified, what additional improvements are proposed?
    - ☐ Are any streams being rerouted? Explain in detail the location and mechanisms for achieving this.

- ☐ Describe any current or proposed bank stabilization measures. FEMA recommends incorporating bioengineering techniques (the use of living and non-living vegetation combined with natural and synthetic support materials).
- ☐ If a detention pond is being excavated, describe the current land use at the proposed site.
- ☐ Describe dimensions, acreage, and depth of any ground-disturbance; include GPS coordinates.
- ☐ Linear feet of stream improvements, if applicable.
- ☐ What is the capacity of any existing system and what will be the capacity of the proposed new system?
- ☐ Describe where the water will ultimately discharge (e.g., an existing water main, a channel, a detention pond, etc.).
    - ☐ Does the receiving system have enough capacity to handle the increased flow?
- ☐ Will property or right(s)-of-way need to be acquired for the project? If so, who owns the property and are they a willing seller? Are there deed restrictions or easements on that land?
- ☐ When feasible, provide design plans, maps, drawings, photos, etc. to illustrate work to be completed.
- ☐ Provide the proposed work schedule (e.g. date range, months, seasons), if known.
- ☐ Photos of all structures in the project area that are 45 years old or older. Photos should be submitted digitally following the guidance in Appendix A.
- ☐ If available, provide biological surveys, site assessments, or other studies that may assist in environmental review.
- ☐ Does the project require vegetation to be removed or modified?

Agency Consultation Letters:

- ☐ If the project is located within a wetland or other water of the United States, please supply US Army Corps of Engineers (USACE) response letters, including any permit documentation.
- ☐ Projects within a mapped floodway or an undesignated floodway are subject to the conditions found in 44 CFR 9.11(4).

8. Bank Stabilization Projects

- ☐ GPS coordinates (latitude and longitude in decimal degrees) and address of project site(s), including staging areas, temporary access roads, and alternate properties. If there are multiple locations, include an electronic spreadsheet (e.g. Excel or csv file) with addresses and GPS coordinates.
- ☐ Date(s) of construction for existing drainage structures and/or bridges affected.
- ☐ Describe dimensions, acreage, and depth of any ground-disturbance; include GPS coordinates.
- ☐ What length of channel will be modified and what are the modifications?
- ☐ Describe any current or proposed bank stabilization measures. FEMA recommends incorporating bioengineering techniques (the use of living and non-living vegetation combined with natural and synthetic support materials).
- ☐ Will property or right(s)-of-way need to be acquired for the project? If so, who owns the property and are they a willing seller? Are there deed restrictions or easements on that land?
- ☐ When feasible, provide design plans, maps, drawings, photos, etc. to illustrate work to be completed.
- ☐ Provide the proposed work schedule (e.g. date range, months, seasons), if known.
- ☐ Photos of all structures in the project area that are 45 years old or older. Photos should be submitted digitally following the guidance in Appendix A.
- ☐ If available, provide biological surveys, site assessments, or other studies that may assist in environmental review.
- ☐ Does the project require vegetation to be removed or modified?
- ☐ Describe any current or proposed bank stabilization measures. FEMA recommends incorporating bioengineering techniques (the use of living and non-living vegetation combined with natural and synthetic support materials)

Agency Consultation Letters:

- ☐ If the project is located within a wetland or other water of the United States, please supply US Army Corps of Engineers (USACE) response letters, including any permit documentation.
- ☐ Projects within a mapped floodway or an undesignated floodway are subject to the conditions found in 44 CFR 9.11(4).

9. Generator/Alternate Power Supply Projects

- ☐ GPS coordinates (latitude and longitude in decimal degrees) and address of project site(s), including staging areas, temporary access roads, and alternate properties. If there are multiple locations, include an electronic spreadsheet (e.g. Excel or csv file) with addresses and GPS coordinates.
- ☐ Date(s) of construction for all structure(s) in the project area, including alternate properties.
- ☐ Is the generator internal or external to the building?
- ☐ Is the generator being placed on an existing or new pad?
- ☐ Is the generator being placed on an existing or new elevated structure?
- ☐ Describe any protective enclosures that will be installed.
- ☐ Will new above or below ground utilities be installed? If so:
    - ☐ Describe dimensions, acreage, and depth of any ground-disturbance; include GPS coordinates.
- ☐ Is the generator fixed or portable?
- ☐ When feasible, provide design plans, maps, drawings, photos, etc. to illustrate work to be completed.
- ☐ Photos of all structures in the project area that are 45 years old or older. Photos should be submitted digitally following the guidance in Appendix A.

If the project takes place within a floodplain:

- ☐ Include details on elevation heights. Structures considered critical facilities by FEMA must be elevated to the 500-year flood level based on best available information.

10. Communication and Warning System Projects

- ☐ GPS coordinates (latitude and longitude in decimal degrees) and address of project site(s), including alternate properties. If there are multiple locations, include an electronic spreadsheet (e.g. Excel or csv file) with addresses and GPS coordinates.
- ☐ Where is the device being mounted? (Pole, tower, building, etc.)
    - ☐ Provide the height of the tower, pole, or building.
    - ☐ Are new poles being installed, and will they replace existing poles in the same location?
    - ☐ Will new holes be required?
- ☐ Are lattice or guy wires being installed?

- ☐ If equipment is to be installed on a building – provide date(s) of construction for all structure(s) in the project area, including alternate properties.
- ☐ What is the power source?
- ☐ Will new above or below ground utilities be installed? If so:
    - ☐ Describe dimensions, acreage, and depth of any ground-disturbance; include GPS coordinates.
- ☐ Does the project require vegetation to be removed or modified?
- ☐ When feasible, provide design plans, maps, drawings, photos, etc. to illustrate work to be completed.
- ☐ Photos of all structures in the project area that are 45 years old or older. Photos should be submitted digitally following the guidance in Appendix A.

11. Community Safe Rooms

- ☐ GPS coordinates (latitude and longitude in decimal degrees) and address of project site(s), including alternate properties. If there are multiple locations, include an electronic spreadsheet (e.g. Excel or csv file) with addresses and GPS coordinates.
- ☐ Date(s) of construction for structure(s) where the safe room is being installed.
- ☐ Safe Room Location:
    - ☐ Inside an existing structure?
    - ☐ As part of a larger structure being constructed?
    - ☐ Connected to an existing structure?
    - ☐ As a stand-alone facility?
- ☐ Will the structure be built on the original or a new footprint?
- ☐ Gross square footage of the safe room.
- ☐ Will access roads, parking lots, or above or below ground utilities be installed?
- ☐ Describe dimensions, acreage, and depth of any ground-disturbance; include GPS coordinates.
- ☐ Past site use information.
- ☐ When feasible, provide design plans, maps, drawings, photos, etc. to illustrate work to be completed.
- ☐ Photos of all structures in the project area that are 45 years old or older. Photos should be submitted digitally following the guidance in Appendix A.

If the project takes place within a floodplain:

- ☐ Include details on elevation heights.
- ☐ Local floodplain administrator response is required if the project is in or affects the floodplain.

12. Individual Safe Rooms

- ☐ GPS coordinates (latitude and longitude in decimal degrees) and address of project site(s), including staging areas, temporary access roads, and alternate properties. If there are multiple locations, include an electronic spreadsheet (e.g. Excel or csv file) with addresses and GPS coordinates.
- ☐ Date(s) of construction for structure(s) where the safe room is being installed.
- ☐ Safe Room Location:
    - ☐ Inside an existing structure?
    - ☐ As part of a larger structure being constructed?
    - ☐ Connected to an existing structure?
    - ☐ As a stand-alone facility?
- ☐ Indicate whether any homes are in a historic district.
- ☐ When feasible, provide design plans, maps, drawings, photos, etc. to illustrate work to be completed.
- ☐ Photos of all structures in the project area that are 45 years old or older. Photos should be submitted digitally following the guidance in Appendix A.

If the project takes place within a floodplain:

- ☐ Include details on elevation heights.

13. Wildfire Mitigation Projects

- ☐ GPS coordinates (latitude and longitude in decimal degrees) and address of project site(s) and a boundary map of the proposed work area. If there are multiple locations, include an electronic spreadsheet (e.g. Excel or csv file) with addresses and GPS coordinates.
- ☐ Date(s) of construction for all structure(s) in the project area, including alternate properties.
- ☐ Does the project require vegetation to be removed or modified?
    - ☐ Describe the type and amount (i.e. acreage, dimensions, etc.) of vegetation to be removed or modified.

- ☐ Does the project involve physical or chemical treatments, or both?
- ☐ What is the method of vegetation removal (e.g. bulldozer, mowing, hand pruning, etc.).
- ☐ How will the vegetation be disposed of – landfill, burning, temporary staging site, mulching, other?

☐ Will property or right(s)-of-way need to be acquired for the project? If so, who owns the property and are they a willing seller? Are there deed restrictions or easements on that land?

☐ When feasible, provide design plans, maps, drawings, photos, etc. to illustrate work to be completed.

☐ Provide the proposed work schedule (e.g. date range, months, seasons), if known.

☐ Describe other current or future vegetation management activities in the area being funded by other entities.

☐ If available, provide biological surveys, site assessments, or other studies that may assist in environmental review.

☐ Photos of all structures in the project area that are 45 years old or older. Photos should be submitted digitally following the guidance in Appendix A.

Agency Consultation Letters:

☐ If the project is located within a wetland or other water of the United States, please supply US Army Corps of Engineers (USACE) response letters, including any permit documentation.

Extraordinary Circumstances

If any of the following circumstances exist within a project, an Environmental Assessment (EA) may be required. This list is not all inclusive and other project complexities may trigger an EA. FEMA will make the determination as to whether an EA is necessary.

I. A potentially significant effect on public health or safety.

II. A potentially significant effect on species or habitats protected by the Endangered Species Act, Marine Mammal Protection Act, Migratory Bird Treaty Act, Magnuson-Stevens Fishery Conservation and Management Act, or other law protecting a species or habitat.

III. A potentially significant effect on historic properties (e.g., districts, sites, buildings, structures, or objects) that are listed or eligible for listing in the National Register of Historic Places, affects traditional cultural properties or sacred sites, or leads to the loss or destruction of a significant scientific, cultural, or historical resource.

IV. A potentially significant effect on an environmentally sensitive area.

V. A potential or threatened violation of a Federal, State, or local law or requirement imposed to protect the environment, e.g.: a local noise control ordinance; the requirement to conform to an applicable State Implementation Plan for air quality standards; Federal, Tribal, State, or local requirements to control hazardous or toxic substances; and environmental permits.

VI. An effect on the quality of the human environment that is likely to be highly controversial in terms of scientific validity, likely to be highly uncertain, or likely to involve unique or unknown environmental risks. This also includes effects that may result from the use of a new or unproven technology. Controversy over, including public opposition to, a proposed action absent any demonstrable potential for significant environmental impacts does not itself constitute an extraordinary circumstance.

VII. The extent to which a precedent is established for future actions with significant effects.

VIII. Significantly greater scope or size than normally experienced for a particular category of action.

IX. Potential for significant degradation of already existing poor environmental conditions. Also, initiation of a potentially significant environmental degrading influence, activity, or effect in areas not already significantly modified from their natural condition.

X. Whether the action is related to other actions with individually insignificant, but cumulatively significant impacts.

Commonly Used EHP Acronyms

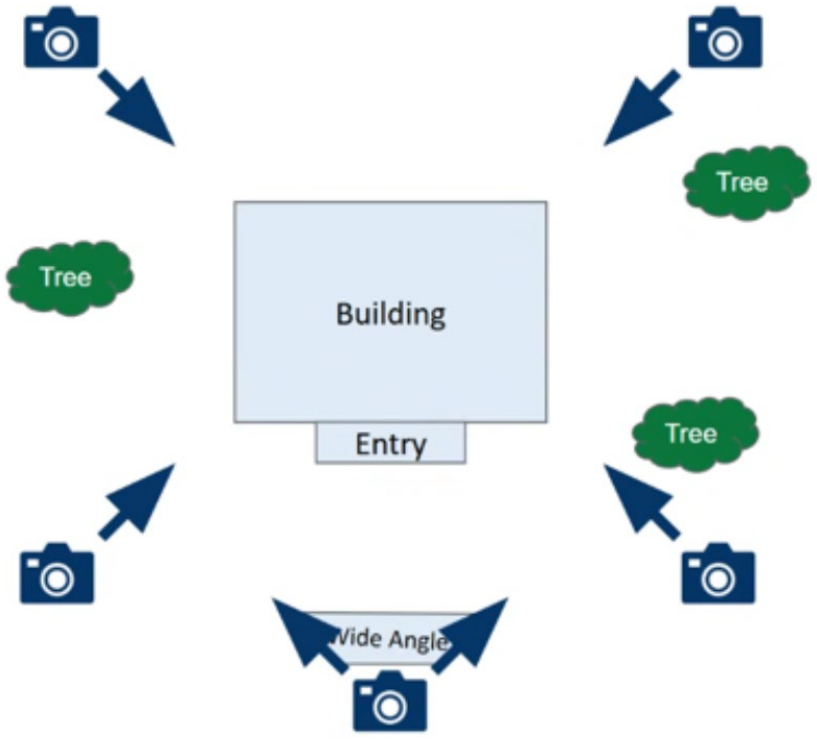
ACHP	Advisory Council on Historic Preservation
APE	Area of Potential Effect
ATP	Archaeological Treatment Plan
BRIC	Building Resilient Infrastructure and Communities
CAA	Clean Air Act
CFR	Code of Federal Regulations
CNDDB	California Natural Diversity Database
EFH	Essential Fish Habitat
EHP	Environmental and Historic Preservation
EO	Executive Order
EPA	Environmental Protection Agency
ESA	Endangered Species Act
FEMA	Federal Emergency Management Agency
FMA	Flood Mitigation Assistance
FMAG	Fire Management Assistance Grant
GPD	Grant Programs Directorate (non-disaster)
H&H	Hydrologic and Hydraulic (Study)
HMA	Hazard Mitigation Assistance
HMGP	Hazard Mitigation Grant Program
MSA	Magnuson-Stevens Fishery Conservation and Management Act
NEPA	National Environmental Policy Act
NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service, aka “NOAA Fisheries”
NOAA	National Oceanic and Atmospheric Administration
PA	Programmatic Agreement, *or* Public Assistance grant program
PBA	Programmatic Biological Assessment
PBO	Programmatic Biological Opinion
PDM	Pre-Disaster Mitigation grant program
SHPO	State Historic Preservation Office(r)
THPO	Tribal Historic Preservation Office(r)
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service

Appendix A. Photograph Guidance for Historic Preservation Review

Applicants will need to submit photos of structures in the project area that are at least 45 years old. The photos need to be *at least* 300 dpi and submitted digitally. Please follow these guidelines:

- ☐ Include at least one overall photo of the building from the front as shown in Figure 1. Make sure the camera is focused on the building, not the foreground elements, and that all building corners, the roof line, and foundation are visible.
- ☐ Where possible, capture all sides of the building at an oblique angle (see Figure 1), but don't be afraid to shoot at additional angles to get the best shot.

Figure 1. Position and Direction for Taking Photos of Historic Structures



- ☐ Take a detail photo of the area where work will take place. For example, if windows will be repaired, take a close-up photo of at least one subject window.
- ☐ A contextual shot of the neighborhood is also helpful, e.g., a shot that includes the subject building and the building next door.

Notes