



Environmental Planning and Historic Preservation Checklist for Hazard Mitigation Assistance Application Reviews

The Federal Emergency Management Agency (FEMA) is required by law to review all grant projects to determine effect on the environment. Some disaster and non-disaster Hazard Mitigation Assistance (HMA) projects that will not result in any physical change to the environment typically do not require an in-depth environmental and historic preservation (EHP) 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 to complete the environmental review. **DISCLAIMER: This checklist is NOT a substitute for providing a complete scope of work or scoping narrative. This checklist is pertinent to EHP only.**

For all other projects, please provide the items listed based on project type to assist with the EHP review. While these guidelines are as specific as possible, be aware that additional information, studies, surveys, design plans, agency coordination and consultation letters, etc. may be needed on a case-by-case basis depending on the proposed scope of work and location. The items listed below will help EHP determine the proposed project's potential to affect the natural and cultural resources such as species and critical habitats, migratory flyways, floodplains, wetlands, water and air quality, archaeological and historic resources, and viewsheds, socioeconomic to name a few. Note, for projects where ground is being disturbed, FEMA R4 will consult with both the State Historic Preservation Office (SHPO) and the Tribal Historic Preservation Offices (THPOs) as both entities have jurisdiction over archaeological resources. **Note, the applicant and/or sub-applicant should not consult directly with any Tribes. FEMA will consult with Federally Recognized Tribes directly as needed during the project review process.**

Acquisition and Demolition

- Scope of Work Details:
 - GPS and address for each project site(s), including any alternate properties the sub-applicant wants approved at the time of award. If there are multiple properties, an electronic spreadsheet with addresses and GPS coordinates is needed.
 - Date of construction for all structure(s), including ancillary buildings and alternate properties.
 - Date of any major modification or renovations for each structure and alternate property. Interior, exterior, or both?
 - Maps, photos, etc. illustrating the project site must be clear, in color and labeled.
 - Dimensions of ground disturbance in the project area.
 - Indicate if ground disturbance is within the existing footprint or will occur outside of the existing structure's footprint and provide dimensions of ground disturbance.
 - Indicate if foundation is to be removed and provide depth of disturbance. If the entire foundation is not to be removed, identify the depth and area of disturbance expected.
 - Staging location of equipment for all properties (GPS in decimal format)
 - Information if there will be work on utilities (i.e., capping or removing of utilities)

- Agency Consultation Letters:
 - FEMA will consult with SHPO/THPOs if (1) structure is 45 years or older at the time of FEMA review; (2) is eligible for listing in the National Register of Historic Places (NR); (3) new ground is being disturbed; or (4) project is within a Historic District which is listed or eligible for listing in the NR. This applies to all properties including ancillary buildings and alternate properties.
- Documentation Requirements:
 - Per Executive Order 11988 Floodplain Management and 44 CFR Part 9, work in Special Flood Hazard Areas (SFHA) require the sub-applicant to notify the public. Please provide FEMA with documentation of the public notice (comment period dates and media—paper, radio, public meeting, posting in a public building, etc. Photo documentation where appropriate or the tear sheet if in newspaper). A public notice template can be provided for compliance.
 - Local floodplain administrator approval if project is in or affects or is affected by the floodplain.

Elevation

- Scope of Work Details:
 - GPS and Address for project site(s), including any alternate properties the sub-applicant wants approved at the time of award. If there are multiple properties, an electronic spreadsheet with addresses and GPS coordinates is needed.
 - Date of construction for all structure(s), including alternate properties.
 - Date of any major modification or renovations for each structure and alternate property. Interior, exterior, or both?
 - Maps, photos, etc. illustrating the project site must be clear, in color and labeled.
 - Dimensions and depth of ground disturbance in the project area.
 - Describe current and proposed foundation type.
 - Current and proposed building elevation height. Mechanism for elevation (i.e., crib/jack; on fill; 2nd story conversion, etc.)? If the structure will be removed from the foundation and temporarily stored to install new foundation, where will the structure be stored and how will it be transported?
 - Design plans, maps, drawings, photos, etc. to illustrate work to be completed.
 - Appraiser documents provide dates of original construction, dates of renovations/modifications, and details of the structure(s)' building materials.
- Agency Consultation Letters:
 - FEMA will consult with SHPO/THPOs if (1) structure is 45 years or older at the time of FEMA review; (2) is listed or eligible for listing in the NR; (3) new ground is being disturbed; or (4) project is adjacent to or within a Historic District listed or Historic Property eligible for listing in the NR. This applies to all properties including alternate properties.
- If project in the floodplain:
 - Per Executive Order 11988 Floodplain Management and 44 CFR Part 9, work in Special Flood Hazard Areas (SFHA) require the sub-applicant to notify the public. Please provide FEMA with documentation of the public notice (comment period dates and media—paper, radio, public meeting, posting in a public building, etc. Photo documentation where appropriate or the tear sheet if in newspaper). A public notice template can be provided for compliance.
 - Critical facilities (pump stations, medical facilities, police, fire, one way in roads, etc.) must be elevated to the 500-year base flood elevation based on best available information.
 - Local floodplain administrator approval if project is in or affects or is affected by the floodplain.

Relocation

- Scope of Work Details:
 - GPS coordinates and address for project site(s), including any alternate properties the sub-applicant wants approved at the time of award. Provide this information for existing site(s) and proposed new site(s). If there are multiple properties, an electronic spreadsheet with addresses and GPS coordinates is needed.
 - Date of construction for all structure(s), including alternate properties.
 - Dates of renovations/modifications, and details of the structure(s)' building materials.
 - Provide past site usage information for proposed new site (urban, residential, industrial, agricultural, etc.). Include any site assessments of proposed relocation areas if available.
 - Maps, photos, etc. illustrating the project site must be clear, in color and labeled.
 - Dimensions and depth of ground disturbance in the project area.
 - Describe current and proposed foundation type.
 - Current and proposed building elevation height.
 - Describe dimensions, acreage, depth of any ground-disturbance.
 - Will the structure be temporarily stored somewhere other than its existing location? How will it be transported to the proposed new site?
 - Design plans, maps, drawings, photos, etc. to illustrate work to be completed.

- Agency Consultation Letters:
 - FEMA will consult with SHPO/THPOs if (1) structure is 45 years or older at the time of FEMA review; (2) is listed or eligible for listing in the NR; (3) new ground is being disturbed; or (4) project is adjacent to or within a Historic District listed or Historic Property eligible for listing in the NR. This applies to all properties including alternate properties.
 - If new construction work is occurring prime or unique farmland; FEMA will consult with USDA and/or NRCS.
 - FEMA will consult with USFWS and/or NMFS as required by Section 7 of the Endangered Species Act. If the sub-applicant and consultant conducted an early notification or requesting technical assistance prior to EHP receiving the project for review; please provide all correspondences and attachments sent to USFWS/NMFS and all responses from the regulatory agencies.

- If project is relocating in the floodplain:
 - Per Executive Order 11988 Floodplain Management and 44 CFR Part 9, work in Special Flood Hazard Areas (SFHA) require the sub-applicant to notify the public. Please provide FEMA with documentation of the public notice (comment period dates and media—paper, radio, public meeting, posting in a public building, etc. Photo documentation where appropriate or the tear sheet if in newspaper). A public notice template can be provided for compliance.
 - Critical facilities (pump stations, medical facilities, police, fire, one way in roads, etc.) must be elevated to the 500-year base flood elevation based on best available information but project designs are recommended to relocate outside the floodplain.
 - New construction (including relocation) is not allowed in a regulatory floodway or coastal high hazard area unless new construction is functionally dependent on being in the special flood hazard areas. Functionally dependent facilities or structures include but not limited to, docks, piers, gravity flow sewer, culverts, water intake structures, hydroelectric plants, dams.
 - Provide elevation certificate, if applicable.
 - Local floodplain administrator approval if project is in or affects or is affected by the floodplain.

Mitigation Reconstruction

- Scope of Work Details:
 - GPS coordinates and address for project site(s), including any alternate properties the sub-applicant wants approved at the time of award. If there are multiple properties, an electronic spreadsheet with addresses and GPS coordinates is needed.
 - Date of construction for all structure(s), including alternate properties.
 - Dates of renovations/modifications, and details of the structure(s)' building materials.
 - Provide past site usage information for proposed new site (urban, residential, industrial, agricultural, etc.). Include any site assessments of proposed relocation areas, if available.
 - Maps, photos, etc. illustrating the project site must be clear, in color and labeled.
 - Dimensions and depth of ground disturbance in the project area.
 - Describe current and proposed foundation type.
 - Current and proposed building elevation height.
 - Will the new structure be built on the same footprint as the previous structure?
 - Previous footprint square footage and proposed footprint square footage.
 - Design plans, maps, drawings, photos, etc. to illustrate work to be completed.
- Agency Consultation Letters:
 - FEMA will consult with SHPO/THPOs if (1) structure is 45 years or older at the time of FEMA review; (2) is listed or eligible for listing in the NR; (3) new ground is being disturbed; or (4) project is adjacent to or within a Historic District listed or Historic Property eligible for listing in the NR. This applies to all properties including alternate properties.
- If project in the floodplain:
 - Per Executive Order 11988 Floodplain Management and 44 CFR Part 9, work in Special Flood Hazard Areas (SFHA) require the sub-applicant to notify the public. Please provide FEMA with documentation of the public notice (comment period dates and media—paper, radio, public meeting, posting in a public building, etc. Photo documentation where appropriate or the tear sheet if in newspaper). A public notice template can be provided for compliance.
 - Critical facilities (pump stations, medical facilities, police, fire, one way in roads, etc.) must be elevated to the 500-year base flood elevation based on best available information.
 - Local floodplain administrator approval if project is in or affects or is affected by the floodplain.

Facility Improvements and Retrofits

- Scope of Work Details:
 - GPS coordinates and address for project site(s).
 - Date of construction for all structure(s).
 - Will improvements require going beyond the original footprint of the existing structure?
 - Maps, photos, etc. illustrating the project site must be clear, in color and labeled.
 - Dimensions and depth of ground disturbance in the project area.
 - Indicate location of work in relation to the building: inside, outside, on top, below, etc.
 - Provide design plans, maps, drawings, photos, etc. to illustrate work to be completed.
 - Dates of original construction, dates of renovations/modifications, and details of the structure(s)' building materials.
 - Renderings are encouraged for assisting with consultations with regulatory agencies.

- Agency Consultation Letters:
 - FEMA will consult with SHPO/THPOs if (1) structure is 45 years or older at the time of FEMA review; (2) listed or eligible for listing in the NR; (3) new ground is being disturbed; or (4) project is adjacent to or within a Historic District listed or Historic Property eligible for listing in the NR. This applies to all properties including alternate properties.

Flood Risk Reduction Projects/Bank Stabilization

- Scope of Work Details:
 - GPS coordinates and address (if available) for project site(s).
 - GPS coordinates of beginning and end of project as well as GPS for proposed work (culvert, drain inlet/outlet, etc.)
 - Date of construction for existing drainage structures and/or bridges, if affected.
 - Maps, photos, etc. illustrating the project site must be clear, in color and labeled.
 - Dimensions and cumulative amount of ground disturbance associated with the protective measures and the size of the area to be protected. (To qualify for a CATEX, the project cannot affect more than 25 acres).
 - Is the project an upgrade to an existing system or does it involve the installation of a new drainage system? Explain any drainage that is already in place in the project area (ditches, curb and gutter sewers, pumps, etc.).
 - Describe any current or proposed bank stabilization measures. FEMA recommends incorporating bioengineering techniques (use of vegetation or a combination of vegetation and construction materials; the use of living and non-living plant materials in combination with natural and synthetic support materials).
 - What is the capacity of any existing system and what will be the capacity of the proposed new system?
 - If a detention pond is being excavated, describe current land use at proposed site.
 - Describe where the water will ultimately discharge (an existing water main, a channel, a detention pond, etc.)
 - Will property need to be acquired for project? Are there deed restrictions or easements on that land?
 - If stream work is involved, is the current stream natural or altered by manmade structures (dams, weirs, concrete lining, culverts, rip rap, etc.)? What length (linear feet) of natural channel will be modified and what are the modifications? If current channel is already modified, what additional improvements are proposed? Are any streams being rerouted? Explain in detail the location and mechanisms for achieving.
- Agency Consultation Letters and Coordination:
 - FEMA will consult with SHPO/THPOs for all drainage projects.
 - If the proposed project will occur within or affect wetlands or waters of the United States (directly or indirectly), provide any USACE 404 Clean Water Act permitting documentation, approvals, and/or correspondences to and from the applicable USACE office.
 - If the proposed project will affect water quality and any state water laws, the sub-applicant must seek permitting or approval from the state environmental/water quality agency regulating 401 Clean Water Act. Provide all correspondences and documents.
 - If the proposed project will discharge any water (point or non-point source), an NPDES 402 Clean Water Act permitting, or approval may be required from the state environmental/water quality agency. Provide all applicable documents pertaining to this including any soil erosion and sediment control plans.

- If new construction work is occurring prime or unique farmland; FEMA will consult with USDA and/or NRCS.
- If work affects or occurs in a wild and scenic river, FEMA will consult with the applicable federal agencies.
- If project in the floodplain (or wetland):
 - Per Executive Order 11988 Floodplain Management (or Executive Order 11990 Protection of Wetlands) and 44 CFR Part 9, work in Special Flood Hazard Areas (SFHA) (or wetland) require the sub-applicant to notify the public. Please provide FEMA with documentation of the public notice (comment period dates and media—paper, radio, public meeting, posting in a public building, etc. Photo documentation where appropriate or the tear sheet if in newspaper). A public notice template can be provided for compliance.
 - Hydraulic and Hydrologic (H&H) Engineering Study.
 - Local floodplain administrator approval if project is in or affects or is affected by the floodplain.
 - Any floodplain map revisions (CLOMRs, LOMRs) should be in process and may require approval prior to EHP review completion.
 - FEMA will consult with USFWS and/or NMFS as required by Section 7 of the Endangered Species Act. If the sub-applicant and consultant conducted an early notification or requesting technical assistance prior to EHP receiving the project for review; please provide all correspondences and attachments sent to USFWS/NMFS and all responses from the regulatory agencies.

Generators

- Scope of Work Details:
 - GPS coordinates and address for generator installation and/or storage site(s).
 - Date of construction for structure(s).
 - Maps, photos, etc. illustrating the project site must be clear, in color and labeled.
 - Provide generator size?
 - Is the generator internal or external to the building?
 - Is it being placed on an existing pad or a new pad? Is it being placed on an existing or new elevated structure? Describe any protective enclosure that will be installed.
 - Describe dimensions (depth, length and width) of any ground-disturbance, including the installation of associated utility lines
 - Is the generator fixed or portable?
 - Maps, photos, etc. to illustrate generator site.
- Agency Consultation Letters:
 - FEMA will consult with SHPO/THPOs if (1) structure is 45 years or older at the time of FEMA review; (2) is listed or eligible for listing in the NR; (3) new ground is being disturbed; or (4) project is adjacent to or within a Historic District listed or Historic Property eligible for listing in the NR. This applies to all properties including alternate properties.
- If project in the floodplain:
 - Per Executive Order 11988 Floodplain Management and 44 CFR Part 9, work in Special Flood Hazard Areas (SFHA) require the sub-applicant to notify the public. Please provide FEMA with documentation of the public notice (comment period dates and media—paper, radio, public meeting, posting in a public building, etc. Photo documentation where appropriate or the tear sheet if in newspaper). A public notice template can be provided for compliance.

Communication and Warning Systems

- Scope of Work Details:
 - GPS coordinates and address, if available, for project site(s).
 - Where is the device being mounted? On a pole, tower, building, etc.?
 - Provide tower or pole dimensions and heights.
 - Are new poles being installed? Will they replace existing poles in the same location, or will a new hole be required?
 - Describe dimensions (depth, length and width) of any new ground-disturbance
 - Are lattice or guy wires being installed?
 - Date of construction for building if equipment being installed on a building.
 - Power source. Will new above or below ground utilities be installed? If so, details on location and dimensions of ground disturbance.
 - Maps, photos, etc. illustrating the project site must be clear, in color and labeled.

- Agency Consultation Letters:
 - FEMA will consult with SHPO/THPOs for all new towers, sirens, messaging systems, and warningsystems when (1) project is adjacent to a structure is 45 years or older at the time of FEMA review; (2) new ground is being disturbed; or (3) project is adjacent to or within a Historic District listed or Historic Property eligible for listing in the NR.
 - If new construction work is occurring prime or unique farmland; FEMA will consult with USDA and/or NRCS.
 - FEMA will consult with USFWS and/or NMFS as required by Section 7 of the Endangered Species Act. If the sub-applicant and consultant conducted an early notification or requesting technical assistance prior to EHP receiving the project for review; please provide all correspondences and attachments sent to USFWS/NMFS and all responses from the regulatory agencies.
 - Migratory Bird Treaty Act review may require best management practices and conditions, found at: <https://www.fws.gov/story/incidental-take-beneficial-practices-communication-towers>.

Community Safe Rooms

- Scope of Work Details:
 - GPS and address for project site(s).
 - Dates of construction for structure(s) where safe room 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.
 - Is structure being installed on existing or new footprint?
 - Gross square footage of the safe room.
 - Dimensions, acreage of ground-disturbance.
 - Will access roads and parking lots be installed? Will new above or below ground utilities be installed?
 - Past site usage information.
 - Maps, photos, etc. illustrating the project site must be clear, in color and labeled.
 - Design plans, maps, drawings illustrating the proposed safe room
 - How is the saferoom anchored?

- Agency Consultation Letters:
 - FEMA will consult with SHPO/THPOs if (1) structure is 45 years or older at the time of FEMA review; (2) is listed or eligible for listing in the NR; (3) new ground is being disturbed; or (4) project is adjacent to or within a Historic District listed or Historic Property eligible for listing in the NR.
 - If new construction work is occurring prime or unique farmland; FEMA will consult with USDA and/or NRCS.
 - FEMA will consult with USFWS and/or NMFS as required by Section 7 of the Endangered Species Act. If the sub-applicant and consultant conducted an early notification or requesting technical assistance prior to EHP receiving the project for review; please provide all correspondences and attachments sent to USFWS/NMFS and all responses from the regulatory agencies.

Individual Safe Rooms

- Scope of Work Details:
 - GPS and address for each residence. If there are multiple properties, an electronic spreadsheet with addresses and GPS coordinates is needed.
 - Date of construction for structure(s) where safe room being installed.
 - Is safe room above ground, underground, or being installed within an existing structure?
 - Indication of whether any homes are in a historic district.
 - Maps, drawings, etc. illustrating work to be completed.
 - Maps, photos, etc. illustrating the project site must be clear, in color and labeled.
 - Renderings are always encouraged for assisting with consultations with regulatory agencies.
 - How is the saferoom anchored, provide details and ground disturbance?
- Agency Consultation Letters:
 - FEMA will consult with SHPO/THPOs if (1) structure is 45 years or older at the time of FEMA review; (2) is listed or eligible for listing in the NR; (3) new ground is being disturbed; or (4) project is adjacent to or within a Historic District listed or Historic Property eligible for listing in the NR.
 - If new construction work is occurring prime or unique farmland; FEMA will consult with USDA and/or NRCS.
 - FEMA will consult with USFWS and/or NMFS as required by Section 7 of the Endangered Species Act. If the sub-applicant and consultant conducted an early notification or requesting technical assistance prior to EHP receiving the project for review; please provide all correspondences and attachments sent to USFWS/NMFS and all responses from the regulatory agencies.
- If project in the floodplain:
 - Provide an elevation certificate or LOMR showing property is not impacted by the floodplain.

Wildfire Mitigation

- Scope of Work Details:
 - GPS coordinates and address for project site(s) and/or a boundary map of proposed work area.
 - Date of construction for structure(s) in project area.
 - Describe type and amount (i.e., acreage, dimensions, etc.) of vegetation to be removed and/or modified. Does the project involve physical or chemical treatments, or both? What is the method of removal (bulldozer, mowing, individual tree removal, etc.)? How will the
 - vegetation be disposed of—landfill, burning, temporary staging site, mulching, other? Will property need to be acquired for project? Are there deed restrictions or easements on that land?
 - Design plans, maps, drawings, photos, etc. to illustrate work to be completed.
 - Description of other current or future vegetation management activities in the area being funded by other entities.

- Agency Consultation Letters:
 - FEMA will consult with SHPO/THPOs for all fire mitigation projects
 - USACE response needed if project in a wetland or in/near or otherwise affects a water of the U.S.
 - Local floodplain administrator response if project in or affects the floodplain. Removal of significant amounts of vegetation and groundcover can affect stormwater runoff.
 - Biological surveys, site assessments, or other studies that may assist in environmental review.

- If project in the floodplain:
 - Executive Order 11988-Floodplain Management requires the sub/applicant to notify the public of any activities in the floodplain. Please provide FEMA with documentation of any public notice (public comment period dates and media—paper, radio, public meeting, posting in a public building, etc.) The public notice template is to be followed as it includes all 44 CFR Part 9 elements of notifying the public.

Extraordinary Circumstances

If any of the following circumstances exists with any project, an Environmental Assessment is likely required. This list is not all inclusive and other project complexities may trigger an Environmental Assessment. FEMA EHP will make the determination as to whether an Environmental Assessment is necessary.

- (i) A potentially significant effect on public health or safety.
- (ii) A potentially significant effect on species or habitats protected by the ESA, 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 in 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. Some examples of other requirements to consider are: 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 new technology 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) Extent to which a precedent is established for future actions with significant effects.
- (viii) Significantly greater scope or size than normally experienced for this 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.