



FEMA

OFFICE OF ENVIRONMENTAL PLANNING AND HISTORIC PRESERVATION
PARTNERS IN SHAPING RESILIENT COMMUNITIES



Environmental and Historic Preservation (EHP) Fact Sheet: Alternate Projects

Environmental resources, cultural institutions, and historic assets define communities and contribute to their well-being and unique character. The Federal Emergency Management Agency (FEMA) plays a critical role by helping communities incorporate environmental stewardship and historic preservation into emergency management decisions. As disasters continue to challenge our nation and communities grapple with issues of preparedness and sustainability, FEMA offers expertise to ensure both legal compliance and informed local, State, Tribal, and national planning.

Alternate Projects and EHP Review

In certain cases, if an applicant determines that the public welfare would not be best served by restoring a damaged facility or its function to its pre-disaster condition, the applicant may request State (Grantee) approval for FEMA Public Assistance funding for an alternate project. The applicant may apply eligible funding to repair or expand other public facilities; demolish the original structure and construct a new-use public facility; purchase capital equipment; perform certain cost-effective hazard mitigation measures located in the area affected by the disaster; provide supplemental funds for an improved project; or fund project shortfalls due to mandatory National Flood Insurance Program reductions on applicant buildings in floodplains. Alternate project funds may be used across all permanent work categories, but must benefit the general public. Before grant funding can be approved, FEMA must review projects to ensure that they meet all relevant environmental laws, policies, and regulations

including the National Environmental Policy Act (NEPA), National Historic Preservation Act (NHPA), and Executive Orders 11988 (Floodplain Management) and 11990 (Protection of Wetlands).

Considering EHP Impacts

Some alternate project types require minimal documentation to comply with the relevant environmental laws, policies, and regulations. However, other projects (e.g., relocation/construction of a facility on a new site or an increase in the size, alignment, or location of a road or bridge) may have significant effects on the environment, including impacts on wetlands or waterways; adverse effects on flood elevations or upstream/downstream velocities; or impacts to endangered species, and generally require a more in-depth environmental assessment (EA) to evaluate the full range of potential impacts. In the case of a relocation, in which a donor facility is being used to fund the alternate project, any applicant action using FEMA funds at the original site, such as demolition, also requires EHP review and may be included as part of the EA. All Federally-funded parts of the project must be in compliance with environmental laws, regulations, and executive orders. Applicants should also contact the appropriate Federal, State, and local government agencies to identify permitting and other requirements. Required permits may include a Clean Water Act Section 404 permit issued by the U.S. Army Corps of Engineers (USACE) and a State-issued Section 401 water quality certification. Applicants are responsible for obtaining all necessary permits, and verification that permits have been obtained and conditions met is required at project close-out. Failure to secure the required permits may jeopardize receipt of FEMA funding.

EHP Considerations for Alternate Projects

- In the case of a relocation, when the applicant solely funds the securing or demolition of the original facility, it does not require FEMA EHP review. However, the applicant is legally and financially responsible for compliance with any other applicable Federal, State, Tribal, or local requirements, including responding to and mitigating for the release of hazardous pollutants.
- Consider fish habitat, wetlands, and other downstream impacts when designing and constructing roads and bridges.
- Ensure that archaeological resources are identified and that impacts are resolved prior to initiating construction.



Alternate Projects: Grant Application EHP Checklist

The checklist below describes project information that FEMA requires in order to complete EHP review of an alternate project.

<input checked="" type="checkbox"/>	Location	State both the original and proposed location of the project, including address and latitude/longitude in decimal degrees (e.g., 38.5342°N, -77.0212°W). Include a site map showing the location of the original and proposed project components (including access roads and parking, landscaping and grading, and utilities, if applicable).
<input checked="" type="checkbox"/>	Description of Project Scope of Work	Provide a project scope of work, including staging areas, construction access, plans for grading and extent of ground disturbance, as well as extent of vegetation removal. Design information needs to provide a clear picture of the scope of the action being reviewed, including upstream and downstream flood data and permitting requirements, if applicable.
<input checked="" type="checkbox"/>	Age of Existing Structures	Provide the original date of construction for any structures (e.g., nearby buildings, facilities, roadways) that may be secured, demolished, altered, or affected by the project.
<input checked="" type="checkbox"/>	Photographs	Submit clear, color photographs of the project site and surrounding structures. Clearly label photos with the location and orientation of the camera relative to the project site.
<input checked="" type="checkbox"/>	Agency Coordination	Coordinate with applicable resource agencies prior to submitting your application to reduce EHP review time. Note communications with resource agencies, such as the State Historic Preservation Officer, USACE, U.S. Fish and Wildlife Service, or State environmental management agencies, and provide copies of correspondence and permits.
<input checked="" type="checkbox"/>	Additional Information	Include copies of any additional resources, studies, or reports; permits or permit requirements; environmental mitigation requirements; hydrologic and hydraulic studies that address proper sizing and potential downstream impacts (if applicable); EAs; design requirements; historic property designations or surveys, including archaeological surveys.

Timeframes for EHP Review

Timeframes for EHP review vary depending on a project's potential to impact the environment and historic properties, and the complexity of the proposed project. For projects that do not affect historic properties or that do not require consultation under Section 7 of the Endangered Species Act (ESA), the review process generally takes 30 days after FEMA has received a complete project application with supporting documentation, including necessary permits. Additional consultation required to resolve impacts identified under Section 7 of the ESA or Section 106 of the NHPA will extend the review period a minimum of 60 to 90 days as it involves coordination with other agencies and stakeholders. For most new construction projects, the need to complete an EA under NEPA will extend the review period a minimum of 60 to 90 days as it involves outside resource agencies and other stakeholders.

EHP Best Practices: New Orleans City Park

In February 2009, the Louisiana Governor's Office of Homeland Security submitted an alternate project request to FEMA to add landscaping and amenities to Hurricane Katrina-damaged New Orleans City Park. FEMA and the applicant worked closely with the SHPO to ensure that the project would not adversely affect National Register-listed historic buildings, and that ground disturbance would have little potential to affect significant archaeological resources. The EA determined that the project would result in long-term improvements to soils and surface and groundwater, and that potential adverse impacts on the environment could be minimized or avoided through the application of best management practices and coordination with the local flood administrator. By working closely with FEMA and resource agencies, the applicant was able to move forward with this important project.

Additional Resources: For more information on EHP review and FEMA grant assistance, contact your State Emergency Management Agency or tribal office or visit http://www.fema.gov/environmental_planning_and_historic_preservation_program.