



FEMA

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



Environmental and Historic Preservation (EHP) Fact Sheet: Placement of Temporary Housing Units (THUs) on Private and Commercial Sites

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.

Placement of THUs and EHP Review

FEMA is authorized under the Stafford Act to provide direct housing assistance in the form of THUs to eligible individuals or households when FEMA has determined that other temporary housing solutions (e.g. rental resources) are not available within a reasonable commuting distance from the affected community. THUs are used to provide safe, secure, and sanitary temporary housing for eligible disaster survivors. FEMA may provide direct housing assistance up to 18 months following a disaster declaration, unless FEMA determines that due to extraordinary circumstances an extension would be in the public interest. This fact sheet applies only to placement of individual THUs on private and commercial sites.

After the determination is made to use THUs and eligible applicants and feasible private sites have been identified and environmental concerns are addressed and resolved, EHP units are transported to the private sites, installed, connected to utilities, and then determined Ready For Occupancy. Eligible applicants are then licensed into the units. When an applicant has obtained permanent housing or the housing mission has ended, the utilities are disconnected and the unit is removed from the site by FEMA and its contractor. Placement of individual THUs on private and commercial sites is a direct Federal action carried out by FEMA's Individual Assistance Program (IA) and its contractor in coordination with State, Tribal, or local officials and the individual or household receiving assistance. Although installation of THUs generally has limited impacts on the environment or historic properties, IA is responsible for ensuring that the appropriate EHP review is completed for these actions and that the agency is in compliance with its responsibilities under the National Environmental Policy Act (NEPA), National Historic Preservation Act, and other applicable Federal laws, regulations, and executive orders.

Considering EHP Impacts

Should placement involve ground-disturbing activities (such as trenching for installation of utilities), IA should notify the Environmental Historic Preservation Advisor (EHAD), who may elect to discuss placement with the State and/or Tribal Preservation Officer to screen the sites for the potential presence of archaeological resources. To facilitate screening, IA should provide a list of properties with street addresses and latitude/longitude in decimal degrees, and a clearly written description of the project scope.

EHP Considerations for Placement of Individual THUs on Private and Commercial Sites:

- Select pre-disturbed areas of a private site whenever possible to minimize additional ground disturbance.
- Coordinate early with the EHAD in order to identify potential environmental and archaeological issues and so screening, if required, can be completed as quickly as possible.
- Minimize ground disturbance by placing utilities above ground or by placing THUs close to existing utility connections.



Complying with Executive Orders 11988 and 11990:

FEMA's implementing regulations (44 CFR Part 9.13) for Executive Order 11988 (Floodplain Management) and Executive Order 11990 (Protection of Wetlands) require FEMA to conduct and document an abbreviated decision-making process for all THUs that may be located in or may affect floodplains and/or wetlands. This process includes:

- A. **Determine the Project Location:** Determine whether the project is located in or may affect a floodplain or wetland. If not, the process is complete and no further review is required other than to document the location on the source map.
- B. **Encourage Public Involvement:** If a proposed project is located in a floodplain or wetland, notify the public at the earliest possible time to involve interested parties. This requirement can be met through the issuance of the Disaster Public Notice. In some cases, additional notices may be needed. Coordinate with the EHAD.
- C. **Evaluate Alternatives:** Determine if there are reasonable alternatives to avoid locating a THU in a floodplain or wetland. If there is no practicable alternative, document the reasoning for the determination.
- D. **Minimize Impact:** If located in a floodplain or wetland, minimize impacts by elevating to the Base Flood Elevation and on open works (non-enclosed supports), if practicable. Provide adequate access and egress to and from the proposed site. Ensure that occupants are covered by existing flood warning and preparedness plans, adequate flood warning is provided, and special consideration is given to flash flood and rapid rise areas. Local flood permits must be obtained; and if the community is not participating in the National Flood Insurance Program (NFIP), placement must be consistent with NFIP requirements.
- E. **Provide Public Explanation:** If not covered under a Disaster Public Notice, prepare and publicize a notice explaining why locating in a floodplain or wetland is the only practicable alternative. Coordinate with the EHAD on providing the appropriate public notice.

Under no circumstances may a THU be placed in a floodway or coastal high hazard zone (V-Zone).

Timeframes for EHP Review

FEMA generally completes any temporary housing site EHP screening within 7-14 days. Streamlining the review through a programmatic approach may reduce that timeframe. Should the placement of a THU potentially adversely affect an environmental resource, consultation with the appropriate resource agency, such as a State and/or Tribal Historic Preservation Officer, and other stakeholders and interested parties to identify avoidance or minimization measures must occur prior to approval. This coordination requirement would extend the time required to complete the EHP review.

EHP Best Practices: Installation of THUs in New York State

Hurricane Irene and Tropical Storm Lee affected 14.1 million people and approximately 73 percent of New York in August and September of 2011. These storms created a substantial need for temporary housing, with 28 counties designated for Individual Assistance and corresponding eligibility for THUs for those displaced from their homes. To meet the need for rapid placement of eligible THUs, local governments, State officials, and FEMA coordinated with the New York State Historic Preservation Office, U.S. Fish and Wildlife Service, and National Resources Conservation Service to complete a Programmatic Categorical Exclusion for NEPA compliance and develop a strategy for environmental site visits and archaeological monitoring that allowed for streamlined THU placement.

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>.