



FEMA

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



## Environmental and Historic Preservation (EHP) Fact Sheet: Improved 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 in 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.

### Improved Projects and EHP Review

Applicants performing work on a disaster-damaged facility using Public Assistance Program funds may utilize funding to make additional improvements while still restoring the facility to its pre-disaster function and capacity. Examples of proposed improved projects include improving a road by laying asphalt on a gravel road or replacing a firehouse that originally had two bays with one that has three bays. Before grant funding can be approved, FEMA must review projects to ensure that they meet all relevant environmental laws, executive orders, and regulations including the National Environmental Policy Act (NEPA), the National Historic Preservation Act (NHPA), Endangered Species Act (ESA), and Executive Orders 11988 (Floodplain Management) and 11990 (Protection of Wetlands).

### Considering EHP Impacts

Some improved project types require minimal documentation to comply with Federal laws, executive orders, and regulations. However, other projects (i.e. such as those that involve changes in the location, footprint, or size of a facility; or an increase in the size, alignment, or location of a road or bridge) may have significant effects on the environment, such as impacts on wetlands or waterways; adverse effects on flood elevations or upstream/downstream velocities; or impacts on archaeological resources or endangered species. These projects generally require a more in-depth study called an environmental assessment (EA) to evaluate the full range of potential impacts. In the case of a relocation project (in which a donor facility is being used to fund the improved project), any applicant action using FEMA funds at the original site, such as demolition, also requires FEMA EHP review and may be included as part of the EA. In addition to NEPA compliance, all federally-funded parts of the project must also be in compliance with all other environmental laws, regulations, and executive orders.

#### EHP Considerations for Improved 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.
- Be sure that archaeological resources are identified and that impacts are resolved prior to initiating construction.

Applicants should contact the appropriate Federal, State, and local environmental agencies to identify permitting and other requirements. For projects that involve in-water work, 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 from the appropriate agencies and complying with all conditions placed on the grant. Verification that required permits have been obtained and all conditions have been met is required at project close-out. Failure to do so may jeopardize FEMA funding.



## Improved Projects: Grant Application EHP Checklist

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

<input checked="" type="checkbox"/>	<b>Location</b>	State the location of both the original and the proposed 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, parking, landscaping, grading, and utilities, if applicable).
<input checked="" type="checkbox"/>	<b>Description of Project Scope of Work</b>	Provide a scope of work, including staging areas, construction access, plans for grading and extent of ground disturbance, and extent of vegetation removal. Design information must be sufficient 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"/>	<b>Age of Existing Structures</b>	Specify the original date of construction for any structures (i.e., nearby buildings, facilities, and roadways) that may be altered or affected by the project.
<input checked="" type="checkbox"/>	<b>Photographs</b>	Submit clear, color photographs of the project site and surrounding structures. Photographs should be labeled with the location and orientation of the camera relative to the project site.
<input checked="" type="checkbox"/>	<b>Agency Coordination</b>	Early coordination with applicable resource agencies, prior to submittal to FEMA, can greatly reduce EHP review time. Note any communications with resource agencies, such as the State Historic Preservation Officer (SHPO), USACE, U.S. Fish and Wildlife Service, or State environmental management agencies, and provide copies of correspondence and permits.
<input checked="" type="checkbox"/>	<b>Additional Information</b>	Include copies of any additional resources, studies, or reports; permits or permit requirements; environmental mitigation requirements; and hydrologic and hydraulic studies that address proper sizing and potential downstream impacts (if applicable); environmental assessments; design requirements; historic property designations or surveys, including archaeological surveys.

### Timeframes for EHP Review

Timeframes for EHP review of improved projects vary depending on a project's potential to impact the environment and/or 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 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: Beauvoir, Biloxi, Mississippi

Beauvoir, the last home of Confederate States of America President Jefferson Davis, was severely damaged by Hurricane Katrina in 2005. This National Historic Landmark included the mansion, the Jefferson Davis Presidential Library, and Confederate cemetery. The Presidential Library, originally scheduled for repair, was determined to be partially located in a high-velocity zone, necessitating its demolition and construction of a new building closer to the historic mansion. In order to mitigate the adverse effect, the applicant, architect, and others working on the project communicated regularly with FEMA and SHPO, involving them in regularly scheduled meetings to plan a building whose size, scale, and landscaping plan would minimize the effect on the mansion. As a result, the applicant was able to minimize an adverse effect, and was able to create a project that preserved the integrity of this important historic site.

**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>.