



# FEMA

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



## Environmental and Historic Preservation (EHP) Fact Sheet: Temporary Housing Group 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 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.

### Temporary Housing Group Sites and EHP Review

Construction of group housing is a direct Federal action carried out by FEMA's Individual Assistance (IA) program and its contractor in coordination with State, local, or Tribal officials. Although in certain situations mission assignments to other Federal agencies may occur, FEMA still has the responsibility to ensure that EHP review is completed for these actions. FEMA's EHP review is designed to support the Agency's goal to move quickly and efficiently to provide housing while ensuring that the Agency is in compliance with its responsibilities under the National Environmental Policy Act (NEPA) and other applicable Federal laws, regulations, and executive orders such as the Endangered Species Act, Clean Water Act, Clean Air Act, and Executive Order 11988: Floodplain Management. The EHP team works closely with IA, State, and local stakeholders in order to select suitable sites that will pose no health risk to occupants and avoid negative impacts on the environment and historic properties.

### Considering EHP Impacts

It is critical to integrate EHP review into the earliest phase of site selection. FEMA's Environmental Historic Preservation Advisor (EHAD) is the primary point of contact for coordinating compliance review and addressing questions and concerns. Close coordination and discussion between the EHAD, program, State, and local stakeholders can often eliminate unsuitable sites from further consideration, saving the time and expense of conducting more extensive EHP review. To the extent possible, several potential sites should be proposed for review, as locations that appear ideal at first glance may prove problematic from a design, engineering, and/or EHP compliance standpoint. Although proposed sites are reviewed for compliance with a variety of EHP requirements, FEMA generally conducts its review through preparation of an expedited environmental assessment (EA). This is a NEPA documentation process that examines a wide variety of potential impacts on environmental and historic resources and addresses the possible presence of hazardous materials and natural hazards. The NEPA process also provides opportunities to incorporate public input into the site selection process. If it is determined that the temporary housing group site will have no significant impact or those impacts can be adequately mitigated, FEMA issues a Finding of No Significant Impact (FONSI) and work can proceed.

### EHP Considerations for Group Housing Site Selection

- Select pre-disturbed sites whenever possible—previously disturbed areas typically have critical infrastructure such as electricity, water, sewer, and other amenities already onsite or easily accessible nearby, which will minimize ground disturbance.
- Try to limit the group housing area to as few acres as possible.
- Avoid historic districts and sensitive areas such as archaeological sites, wetlands, floodplains, habitats for protected species, and contaminated sites.
- Remember that State, local, or Tribal governments participate in site selection and hold the primary responsibility for approving sites, as well as for addressing permitting and zoning processes for site development.



## Temporary Housing Group Sites: EHP Checklist

The checklist below describes project information that FEMA requires in order to complete EHP review of a temporary housing group site.

<input checked="" type="checkbox"/>	<b>Location</b>	State the location of the project, including both the site address and latitude/longitude in decimal degrees (e.g., 38.5342° N,-77.0212° W). Include available maps, studies, plans, drawings, sketches, schematics, etc., to help reviewers understand the boundaries of the proposed site and how the site relates to its surroundings. Include USGS topographic maps, aerial imagery, floodplain and wetlands maps, soils maps, streams and tributaries maps, and Seismic Hazard Evaluations.
<input checked="" type="checkbox"/>	<b>Description of Project Scope of Work</b>	Provide a detailed description of the project scope of work and preliminary plans, including critical infrastructure upgrades, ground disturbing activities, utility provision access, and any special staging areas that may be required.
<input checked="" type="checkbox"/>	<b>Photographs</b>	Provide clear photographs of the proposed site, including any existing buildings and a 360-degree view of the surrounding area. Label photographs with the location and orientation of the camera relative to the construction site. Identify any special resources, such as wetlands, that are present on the site.
<input checked="" type="checkbox"/>	<b>Agency Coordination</b>	Note any communications with local, State, and Federal resource agencies, such as the State Historic Preservation Officer (SHPO), U.S. Fish and Wildlife Service, or U.S. Army Corps of Engineers, and provide copies of correspondence. Coordination with the local floodplain manager is especially important in the site selection process.
<input checked="" type="checkbox"/>	<b>Additional Information</b>	Include copies of other relevant information, such as EAs and remediation reports, permits, historic property designations or surveys, or archaeological surveys.

### Timeframes for EHP Review

Because temporary group housing is frequently a critical need, FEMA generally completes an EA within 7 to 14 days. If a site is found to be unacceptable, the same level of EHP review will be required for alternative sites. Section 106 of the National Historic Preservation Act is usually completed as part of the NEPA EA process. However, should FEMA decide to proceed with development of a site that will have an adverse effect on a historic property, FEMA, in consultation with the SHPO and/or Tribal Historic Preservation Officer, affected Tribes, and other stakeholders and interested parties, must develop a Memorandum of Agreement that sets forth the terms and conditions agreed upon to resolve the adverse effects of the undertaking on the historic property. This process requires a minimum of 60 to 90 days to complete.

### EHP Best Practices: Temporary Group Housing in the Wake of Hurricane Ike

Following Hurricane Ike in September 2008, local stakeholders and FEMA IA staff identified a potential temporary housing group site that seemed to meet the needs of displaced citizens in the community. Although there were no apparent environmental issues, early EHP review revealed that the site had previously served as a World War II blimp base and contained dangerous levels of hazardous waste, as well as potentially unexploded ordnance. Because of costs and potential health risks to occupants, the site was eliminated early in the identification process, protecting the health of occupants and saving large sums of Federal funds that would have been required for clean-up and remediation. By working together to screen the site for environmental issues, FEMA, the State, and the local community were able to quickly turn their attention to the identification of an alternate safe and suitable location.

**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>.