

Generators: Information Required for Environmental Review

This Job Aid is to help communities applying for Hazard Mitigation Assistance grants for generator projects. It outlines the required documentation needed for the FEMA to carry out an Environmental Planning and Historic Preservation review of a project.

ABOUT THIS RESOURCE

It is required by law that all projects funded with Hazard Mitigation Assistance (HMA) grants comply with Environmental Planning and Historic Preservation (EHP) laws, regulations and Executive Orders (EOs). During the EHP review process, FEMA evaluates the potential impacts of the project on the human and natural environment.



Figure 1. A backup generator is being connected to a building.

FEMA begins the EHP review process once the project application is submitted. It is your responsibility as the subapplicant to provide documentation that accurately describes the project, its purpose, location, existing environmental conditions in the project area, potential project impacts, best management practices (BMPs), different alternatives considered for the project and mitigation strategies to address environmental impacts of the project.

FEMA will assess the potential impacts of the project. The applicant must wait until the EHP review has been completed by FEMA before starting work on the project. FEMA will also conduct a technical review to verify your project's technical feasibility and cost-effectiveness. Refer to the Generators Technical Review Job Aid.

Table of Contents

What is the EHP Review?	2
What Information is Required for the EHP Review of Generator Projects?	2
1. Scope of Work	3
2. Project Area and Structure Information	5
3. Potential Impacts on People, the Environment, and Cultural Resources	7
What Happens Next?	12
Scope of Work Checklist	14

What is the EHP Review?

During the EHP review, FEMA assesses the potential impacts of your project on nearby physical, cultural (historic and archeological), biological and social resources. The National Environmental Policy Act (NEPA) requires FEMA and other federal agencies to assess the environmental impacts of proposed federal actions prior to making decisions. FEMA must also ensure your project is compliant with various federal laws and presidential EOs, such as the Clean Water Act (CWA), the Endangered Species Act (ESA), the National Historic Preservation Act (NHPA), EO 11988 on floodplains and EO 11990 on wetlands. The EHP review may include consultation with other federal and state agencies, which may add time to the review process.

Projects with less potential for impacts may be covered by a Categorical Exclusion (CATEX) under NEPA. Complex projects may need more extensive review through the preparation of an Environmental Assessment (EA) or an Environmental Impact Statement (EIS). For your project, FEMA will prepare or provide support for the development of the NEPA-required documentation, and you can help by providing the information discussed in this Job Aid.

FEMA has predetermined that projects complying with certain criteria do not have significant environmental impacts and may be covered by a CATEX for NEPA compliance. Many generator projects will meet the criteria for CATEX N18 *Federal Assistance for Construction or Installation of Structures, Facilities, or Equipment to Ensure Continuity of Operations*. CATEX N18 covers actions involving the construction or installation of measures for the purpose of ensuring the continuity of operations during incidents such as emergencies, disasters, flooding, and power outages involving less than one acre of ground disturbance, including the installation of generators.

What Information is Required for the EHP Review of Generator Projects?

This section outlines information that should be included in your application so that FEMA can review your project for EHP compliance. FEMA HMA program staff will conduct a review to make sure the project complies with HMA program eligibility. For each item, there is an explanation as to why it is needed, where you can find this information and an example of how the information should be provided to FEMA. Each piece of information requested is needed to develop a comprehensive project description to be included with your application.

1. SCOPE OF WORK

1A: What are you proposing to do?

- Describe your generator project's scope of work including its size and power requirements, fuel type and the related equipment and infrastructure that would be needed (e.g., generator hookups, distribution panels, automatic or manual transfer switches, electrical wiring, enclosures, site preparation requirements such as the installation of concrete pads).
- What would be the elevation of the generator?
- Does the design include any other enclosures or fencing?
- Where would the fuel source be located? Is the fuel source existing, or would it be newly installed?
- How would the new generator be hooked up or connected to the building? Would you utilize a pre-existing connection or install a new connection? If the connection is new, provide details of the new element, as well as photographs showing the location where the new element would be installed.
- Would new equipment be installed in the building? If yes, provide the location where new equipment would be located, and provide photographs of this location.
- Critical facilities are structures and institutions that are deemed by the local community and other jurisdictions as critical to the continuity of the community before, during and after an event (such as hospitals). If your generator project would serve a critical facility, please describe the facility and its function.
- If the project would disturb the ground for any reason (e.g., foundation excavation, trenching for utility lines, clearing a staging area), describe the activities (both temporary and permanent) that would require ground disturbance and show locations on a map or plan view; include length, width and depth of the ground disturbance.
- Describe the existing condition of the ground surface (e.g., pavement, landscape shrubs and trees, previously undisturbed soils with vegetation) that would be disturbed.

Why It's Needed: Generator projects are intended to ensure continuity of operations by providing a secondary source of power to a facility. A complete project description is essential for FEMA to understand how the project may impact human, environmental and cultural resources. The methods used to install a generator may temporarily increase erosion and sedimentation, impact species or affect human communities. Ground disturbance could affect archaeological resources, soils or utilities. FEMA will use this information to evaluate impacts and it may affect the complexity of the EHP review.

Potential Sources: Project architects, engineers, design plans or drawings, contractors

EXAMPLE:

The purpose of the backup generator project is to run a water treatment plant (WTP) during power outages caused by emergency situations such as a flood or wildfire. The project would install a new diesel-powered standby generator with a 200 kW capacity. The generator could be started remotely and would automatically switch operations to the backup power generator. The generator would be sized to operate and control the

entire facility for multiple days during extended power outage situations. The project would upgrade the manual transfer switch of the existing generator to an automative transfer switch. This would allow the WTP to automatically switch to generator power whenever a power outage occurs. Ground disturbance would be 25 feet by 20 feet with a vertical depth of disturbance of 2 feet. The project area is within the existing WTP property. The ground surface for the project consists of stone aggregate and was previously disturbed to construct the WTP facility.

1B: How would the project area be accessed and where would the staging areas be located?

- Describe how the project area would be accessed. Show the boundaries of the access routes or points on a map or plan view of the project area and describe the surface type (e.g., asphalt, dirt, gravel).
- If any new access routes need to be created for the work to be completed, show where the routes would be located on a map or plan view of the project area.
- Describe where materials and equipment would be stored and staged during construction. Show the boundaries of the staging area(s) on a map or plan view of the project area and describe the surface type (e.g., asphalt, dirt, gravel).
- If the creation of new access routes or staging areas would require ground disturbance or vegetation removal, describe the extent of the ground disturbance (see Item 1A) and vegetation removal (see Item 3H).
- Describe the vehicles and equipment that would be used to implement the project.
- Describe any local restrictions on equipment use (e.g., seasonal or daily restrictions, work hours, local noise ordinances).

Why It's Needed: Installation of a generator may require a new access point to a property or leveling a staging area for construction. FEMA will evaluate the potential for impacts from activities that disturb the ground or remove vegetation. Some types of equipment may have impacts related to erosion, noise, air pollution or accidental releases of fuel and lubricants. Vehicles and equipment use may cause ground disturbance that could impact archaeological resources.

Potential Sources: Project planners, construction contractors, engineers

EXAMPLE:

An excavator, dump truck and crane would be used to install the generator. The equipment would be staged in an existing parking lot that serves the water treatment plant (WTP). The WTP is accessible via River Road (State Route 11) and the existing paved access road to the facility. No additional access routes would be created to install the generator.

1C: What are alternatives to the project?

- Describe what would happen if the project were not implemented.

- If any other alternatives were developed, describe how they would have achieved the same goal and explain why those options were dismissed. If the public (including groups and agencies) provided input on the alternative(s), include the feedback you received.

Why It's Needed: FEMA may need to compare the impacts of the project with the impacts of alternatives (including any alternatives that were dismissed).

Potential Sources: Project planners, public outreach meetings, board meeting notes, preliminary designs

EXAMPLE:

Aside from the Proposed Action, the city considered two alternatives for the project: 1) Installation of a natural gas or propane generator, and 2) no-action (not implementing the project). The first alternative was dismissed because a natural gas or propane-powered generator could not provide the power necessary for the WTP functions. The no-action alternative was also dismissed because a power failure at the WTP could pose a catastrophic risk to public health and safety and did not meet the purpose and need for the project.

1D: What is the project schedule?

- Provide a schedule that includes construction, operation and maintenance activities, including the months or seasons when work would occur.

Why It's Needed: FEMA will use information on the timing and duration of different activities to evaluate the significance of impacts on people and the environment.

Potential Sources: Project engineer

EXAMPLE:

The generator is expected to take approximately 4 months to install. The first month would consist of site preparation, demolition and disposal of the existing generator. Construction of a concrete pad for the generator would take one week. Installation of the electrical conduit and wire for the generator would take one month. Installation of the generator on the pad would be one week. Start-up and commissioning of the Programmable Logic Controller (PLC) and Supervisory Control and Data Acquisition (SCADA) system for the generator would be one month. The work would be completed in the spring and early summer.

2. PROJECT AREA AND STRUCTURE INFORMATION

2A: Where would the generator be located?

- Provide the geographic coordinates (latitude and longitude) and the physical site address of the generator and structure(s) and/or infrastructure it would serve.
- Provide a geographic information system (GIS), computer-aided design (CAD), Google Earth files (.kmz), or map or image that clearly shows the boundaries of the project area. If your project area has a complex boundary, a GIS or .kmz file is preferred. The information provided should show the boundaries of all temporary and

permanent project activities including staging areas, access routes, vegetation removal and the affected structure(s) or infrastructure.

- Provide an estimate of the area of ground disturbance in acres or square feet.
- Provide a few representative photographs of the surrounding area to the north, south, east and west of the project area.
- Provide engineering drawings, if available.

Why It's Needed: FEMA needs the project location and boundaries to evaluate existing conditions in the project area and potential project impacts.

Potential Sources: Municipal GIS or CAD data or Google Earth files developed for the project design, local building inspectors, tax assessor records, property deeds, and engineering plans. The geographic coordinates of your project area can be obtained using software such as GIS or Google Earth, websites such as Google Maps, Bing Maps or latlong.net, smartphone mapping apps or with a Global Positioning System (GPS) device.

EXAMPLE:

The project area encompasses a 20-foot by 25-foot area within the Smithville WTP. The general physical address is 10 Riverside Street, Smithville, CA. The center of the project area is latitude, longitude: 35.463958, -97.637887. The map and GIS shapefile included with the application show the project area boundary, access routes, equipment staging locations, and existing generator location. Conceptual engineering drawings for the generator are also included in the application.

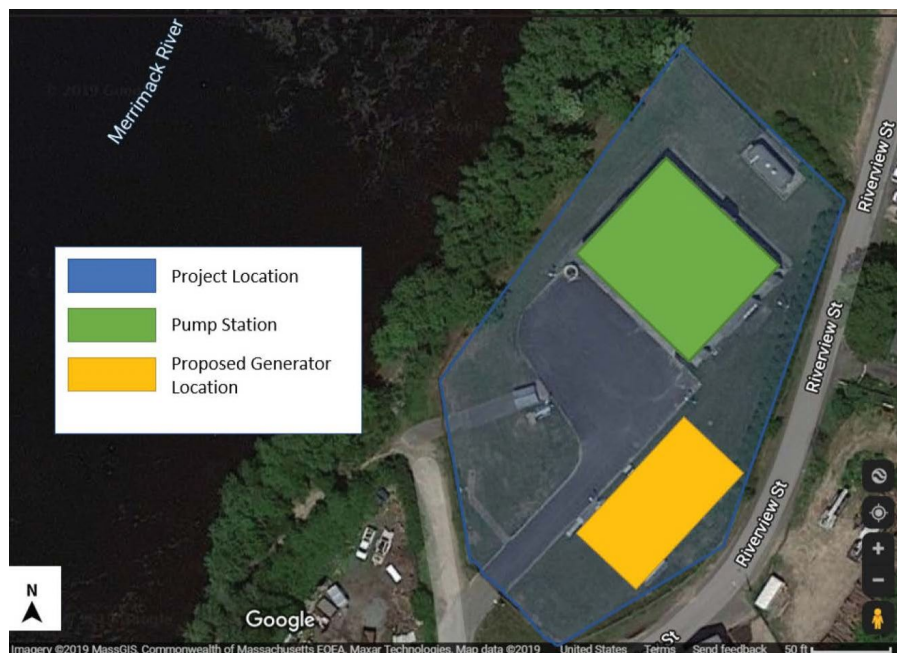


Figure 2. Example of a project site map. Map clearly shows the facility to be mitigated and the project area. The map includes a north arrow and a scale.

2B: Describe the structures in the project area.

- Provide a description of the type, number, size and dimensions of the structure(s) to be served by the generator, including photographs of all sides and the year they were originally constructed.
- Describe the location of the generator in relation to the structure (e.g., at rear, side or front of structure).
- Describe adjacent structures, including photographs and the year they were originally constructed.
- Describe any prior improvements or additions that have been made to the structure(s) (e.g., new windows, change in roofing material from the original construction), changes to the original location (i.e., relocation) of the structure(s) or other changes to the original design of the structure(s).
- If the structure(s) is designated as historic or is in a designated historic district, provide information on the known historic property/district, as applicable.

Why It's Needed: FEMA will use the date of construction to screen whether the structure where the generator would be installed, or adjacent structures, might be historic and to help determine the effect that the project may have on historic properties. Structures that are 45 years or older at the time of application may be eligible for listing in the National Register of Historic Places. FEMA will use the description of the placement of the generator to determine if there would be impacts on historic properties. Older structures may require additional EHP review. Photographs of the structure(s) may allow FEMA to make a determination without needing to visit the site. Actions that change the character of structures and may also change its cultural value. This could have a negative impact on structures, buildings, sites, objects or historic districts that may be eligible for listing or be listed in the National Register of Historic Places.

Potential Sources: Tax assessor data (provide the URL for the tax assessor if possible), GIS-based tax assessor database

EXAMPLE:

The project area includes a concrete pad and adjacent maintenance shed (see attached map). The WTP administration building is 200 feet west of the proposed generator location. The administration building was constructed in 1985. The maintenance shed is a metal prefabricated storage shed with no foundation that is fastened by four shed eye anchors. The maintenance shed was constructed in 2005.

3. POTENTIAL IMPACTS ON PEOPLE, THE ENVIRONMENT AND CULTURAL RESOURCES

3A: Has the public been notified or provided input?

- Explain any controversy that exists or could exist related to the project.
- Describe any existing or planned public engagement activities for the project.

Why It's Needed: If there is or could be controversy around a project, FEMA may need to use a higher level of NEPA documentation. Public input can help identify potential impacts on environmental and cultural resources or low-income and minority communities. You may also be involved in the publication of public notices for the project, in accordance with FEMA procedures.

Potential Sources: Notices in the local newspapers, public outreach meetings, website postings, project planners

EXAMPLE:

A public notice describing the proposed project was circulated in the Smithville Herald on March 2. A copy of the notice is included with the application materials.

3B: Did you coordinate with or consult regulatory agencies?

- Describe any agency coordination and permits you obtained from federal, state or local agencies to implement the project. Provide copies of any coordination materials, permit applications, or approvals.

Why It's Needed: If you have already coordinated with an agency, then FEMA may be able to avoid duplication of effort. FEMA also may coordinate with state or federal agencies that have issued permits and approvals to confirm findings, identify BMPs or determine mitigation measures for project impacts. Many agencies, including the U.S. Army Corps of Engineers, offer a pre-application process where you can learn more about the permits and conditions that may be required for your project.

Potential Sources: Project planners

EXAMPLE:

The generator would be a new stationary source of air pollutants and the city would obtain the appropriate state permits. In addition, the project would place the generator on the roof of the structure so that it is above the potential flood elevations; however, that would increase the height of the building above what is typically allowed in the coastal zone. In December, the city obtained a permit to allow the increased height in the coastal zone. See the attached permit, application, permit approvals and related correspondence.

3C: Were environmental or cultural studies conducted?

- If any environmental or cultural studies were completed either for this project or for other projects in the same area by local, state or federal entities, please provide copies. Studies could include evaluations of cultural resources (e.g., historic, archaeological) or environmental resources (e.g., threatened and endangered species, wetlands, hydrology).

Why It's Needed: FEMA may use the findings during the EHP review to avoid duplicating efforts.

Potential Sources: Project contractor or engineer, EHP studies required by state law or local ordinances, environmental studies completed within or near the project area

EXAMPLE:

For a prior project that expanded the capacity of the WTP facility, the city conducted a biological survey for the endangered California red-legged frog (*Rana draytonii*) and an architectural and archaeological survey. The reports from those studies are attached. Those prior studies overlap with the current project area and cover about half of the project area.

3D: Would your project encroach on floodplains?

- Describe the project activities in the floodplain, if applicable, as well as use and occupancy of the facility.
- For non-coastal projects that would include fill or changes to the floodplain, has a hydrologic and hydraulic analysis been conducted? If yes, include the study with your application.
- If the generator is in a floodplain, describe how the generator would be protected from flooding. If the generator were elevated, to what height relative to the flood elevation would the generator be elevated? Note that the flood elevation for critical facilities is the 500-year elevation, if mapped. Examples of critical facilities include schools, hospitals, and fire stations.

Why It's Needed: FEMA needs to understand whether your proposed project will physically impact a floodplain or whether the project could be impacted by flooding during and after construction pursuant to EO 11988 – Floodplain Management. If the project has the potential to impact floodplains, you may be involved in the publication of public notices required by FEMA procedures.

Potential Sources: Local floodplain agency/administrator, history of flooding/flood claims, [FEMA Flood Map Service Center](#)

EXAMPLE:

Based on a review of FIRM Map #06087C0365D effective 2/26/2014, the entire project is in Flood Zone AE (100-year floodplain). All project activities would occur in the floodplain; however, the project would not raise the Base Flood Elevation (BFE).

3E: Are there surface waters or wetlands in the project area?

- Describe any surface waters in or near the project area (e.g., ponds, lakes, rivers, streams, wetlands, other waterbodies).
- Describe any measures that would be used to avoid waterbodies or avoid impacting water (e.g., setbacks, cofferdams, silt fence).

- Provide any permits or applications that were developed related to project impacts on surface waters.

Why It's Needed: FEMA needs to evaluate existing conditions and potential impacts on water resources regulated by the CWA, the Coastal Zone Management Act and EO 11990 – Protection of Wetlands. If the project has the potential to impact wetlands, you may be involved in the publication of public notices required by FEMA procedures. Temporary construction measures, such as silt fencing, and their manner of placement, may cause ground disturbance and could affect archaeological resources or Waters of the U.S.

Potential Sources: CWA permits and approvals, wetland delineations of the site, [National Wetlands Inventory \(NWI\) Mapper](#)

EXAMPLE:

One freshwater wetland was identified in the project area through a review of the NWI Mapper and a wetland delineation completed in October. The generator location was changed after the delineation to avoid construction within or adjacent to the wetland. See attached aerial photo with annex and delineated wetlands highlighted.

3F: Would your project have an impact on hazardous or contaminated materials?

- Describe any known hazardous or contaminated materials that may be present in the project area or that are needed to implement the project.
- If your project would use any hazardous materials, describe the BMPs that would be used to minimize exposure of people and the environment to those materials and how the materials would be discarded.

Why It's Needed: The presence, management, use or generation of hazardous materials can impact the natural and human environment. FEMA needs to evaluate potential project impacts from (or use of) hazardous and contaminated materials regulated by federal and state law including the Comprehensive Environmental Response, Compensation, and Liability Act and the Resource Conservation and Recovery Act. Any site that has or has had recorded hazardous water issues will require a Clean Site Certification prior to grant approval.

Potential Sources: Environmental site assessments, site visits, state environmental agency/databases, [EPA Envirofacts](#)

EXAMPLE:

Operation of the generator would require installation of a 300-gallon underground storage tank (UST) for diesel fuel. The UST would be installed in accordance with the state's oil tank control program and would be registered with the state. Following emergencies, the fuel tank would need to be refilled. Refilling operations would be conducted by licensed suppliers in accordance with state regulations.

3G: Would your project use imported fill?

- If your project involves the use of fill, describe the type and source of the fill material.

Why It's Needed: FEMA needs to confirm that the fill used is free from contaminants and is compliant with federal and state hazardous and contaminated materials laws. FEMA also needs to evaluate the source of fill for potential effects to historic properties. If a borrow site is being used, it is also important to ensure that the area is not archaeologically sensitive.

Potential Sources: Project planner or engineer, and similar completed projects

EXAMPLE:

Installation of the concrete pad for the generator would involve excavation to a 2-foot depth. Onsite fill would be used to backfill the excavation. If any additional fill is required, it would be obtained from Joe's Backfill Lot.

3H: Is vegetation removal required?

- If the project would remove vegetation for any reason, describe the type and amount or area of vegetation (e.g., two oak trees, 100 square feet of shrubs).
- Describe how vegetation would be removed, if applicable (e.g., root ball removal, flush cut, dug up).
- Provide photographs of the vegetation to be removed in the project area.
- Would you restore vegetation after the project is complete or does the project include planting or seeding of vegetation? If so, describe where and how it will be planted (e.g., by hand, with machinery, broadcast seeding) and the types (e.g., grasses, trees, shrubs) and species of vegetation that would be planted.
- Would any special techniques be used to ensure survival of the plants/seeds (e.g., mulch, irrigation, protective fencing)?

Why It's Needed: Vegetation removal could cause the loss of habitat for wildlife species including an endangered or threatened species. Root ball removal could also impact archaeological resources that may be present within the root system. FEMA will evaluate the impact vegetation removal has on environmental resources.

Potential Sources: Project planner or engineer, landscape architects, and similar completed projects

EXAMPLE:

Vegetation removal would consist of landscape shrubs and bushes around the maintenance shed, totaling approximately 300 square feet of vegetation removal. Plants would be removed using handheld tools and the vegetative debris would be hauled off to the nearest county transfer site. Once the generator is installed, grass would be planted in the disturbed areas.

3I: What Best Management Practices would the project use?

- List all BMPs to be implemented, as part of the project, to reduce potential impacts.

Why It's Needed: Most projects require BMPs to limit noise, dust and erosion while the project is being implemented. FEMA needs to document BMPs that will be used to ensure the project's environmental impacts will be avoided and minimized, where possible, in compliance with federal and state environmental laws.

Potential Sources: Project engineers, BMP guidance provided by federal, state or local environmental agencies, and BMPs specified in permit approvals issued by federal, state or local agencies

EXAMPLE:

The city would implement the following BMPs during project implementation:

Air Quality: The selected contractor would keep vehicle and mechanical equipment running times to a minimum and all engines would be properly maintained.

Water Quality: A silt fence would be installed prior to foundation and utility line excavation to minimize the potential for soil erosion while the project is being implemented.

Hazardous Materials: Equipment and vehicles would be inspected daily for fuel and fluid leaks. Any spills or leaks would promptly be contained and cleaned up and the equipment would be repaired. A spill prevention plan would be developed for hazardous materials to be used during project implementation. Storage and handling of hazardous and toxic materials would occur at least 150 feet from streams and waterbodies.

Noise: No project activities would occur between the hours of 10:00 p.m. and 7:00 a.m. in compliance with the town's noise ordinance.

What Happens Next?

The EHP review process occurs throughout the life cycle of the HMA project and has three specific steps where different aspects of the review process occur. The three steps are detailed below.

- Pre-Award:** This is the information and documentation gathering stage of the EHP grant review process. Following the directions provided in this Job Aid will help you create a comprehensive application that includes all foreseeable required information needed for the EHP review. Providing this information as quickly and as accurately as possible will help expedite the next steps and reduce the need for FEMA to request additional information. The need for additional information may significantly impact the length of time for the EHP review by up to 60 days, if not more, for every request for information sent.
- Formal EHP Review:** Once the required information and documentation is gathered, FEMA will review the project to ensure it is compliant with all EHP-related laws, EOs and regulations. The level of EHP review necessary for a particular project will depend on the type of project, its complexity and the potential impacts it may have on the human and natural environment. Less complex projects with no potential impacts may undergo a short EHP review, while more complex projects with several potential impacts may take longer to review and may require

consultation with other federal/state agencies and/or the creation of an EA or EIS. At the end of this process, a Record of Environmental Consideration (REC) will be completed, itemizing the project conditions that will be included with your award packet. These conditions could include measures such as reaching out to other federal agencies for potential permits, ensuring proper documentation is followed during waste disposal and stopping work if a sensitive historic resource is discovered. You will want to carefully review all the conditions in your award packet during project implementation to remain compliant with the grant.

- **Closeout:** Once the project is complete, the applicant (State/Tribe) will request project closeout from FEMA. FEMA will begin closing out the project and, during this time, will follow up on all the conditions stipulated in the REC. If any condition required you to document activities or outcomes, FEMA will request that documentation during closeout. If FEMA discovers that any of the conditions were not met, the project could be found non-compliant, and FEMA may seek to recover the grant money.

If deviations from the proposed scope of work result in design changes, the need for additional ground disturbance, additional removal of vegetation or result in any other unanticipated changes to the physical environment, you must contact FEMA, and a re-evaluation under NEPA and other applicable environmental laws would be conducted.

ADDITIONAL RESOURCES:

- FEMA's Office of Environmental and Historic Preservation – Home page of FEMA's EHP office
- HMA EHP At-a-Glance Guide – Provides a general overview of EHP review considerations
- FEMA Directive 108-1 – Legal document that directs how FEMA EHP reviews projects
- DHS Instruction Manual 023-01-001-01, Rev 01 – Appendix A lists CATEXs

Scope of Work Checklist

Below is a summary checklist of all the questions from the previous sections. Use this checklist to help you as you complete your information packet.

1. SCOPE OF WORK

- Describe your generator project's scope of work, including its size and power requirements, fuel type and the related equipment and infrastructure that would be needed (e.g., generator hookups, distribution panels, automatic or manual transfer switches, electrical wiring, enclosures, site preparation requirements such as the installation of concrete pads).
- What would be the elevation of the generator?
- Does the design include any other enclosures or fencing?
- Where would the fuel source be located? Is the fuel source existing, or would it be newly installed?
- How would the new generator be hooked up or connected to the building? Would you utilize a pre-existing connection or install a new connection? If the connection is new, provide details of the new element, as well as photographs showing the location where the new element would be installed.
- Would new equipment be installed in the building? If yes, provide the location where new equipment would be located and provide photographs of this location.
- Critical facilities are structures and institutions that are deemed by the local community and other jurisdictions as critical to the continuity of the community before, during and after an event (such as hospitals). If your generator project would serve a critical facility, please describe the facility and its function.
- If the project would disturb the ground for any reason (e.g., foundation excavation, trenching for utility lines, clearing a staging area), describe the activities (both temporary and permanent) that would require ground disturbance and show locations on a map or plan view; include length, width and depth of the ground disturbance.
- Describe the existing condition of the ground surface (e.g., pavement, landscape shrubs, and trees, previously undisturbed soils with vegetation) that would be disturbed.
- Describe how the project area would be accessed. Show the boundaries of the access routes or points on a map or plan view of the project area and describe the surface type (e.g., asphalt, dirt, gravel).
- If any new access routes need to be created for the work to be completed, show where the routes would be located on a map or plan view of the project area.
- Describe where materials and equipment would be stored and staged during construction. Show the boundaries of the staging area(s) on a map or plan view of the project area and describe the surface type (e.g., asphalt, dirt, gravel).
- If the creation of new access routes or staging areas would require ground disturbance or vegetation removal, describe the extent of the ground disturbance (see Item 1A) and vegetation removal (see Item 3H).

- Describe the vehicles and equipment that would be used to implement the project.
- Describe any local restrictions on equipment use (e.g., seasonal or daily restrictions, work hours, local noise ordinances).
- Describe what would happen if the project were not implemented.
- If any other alternatives were developed, describe how they would have achieved the same goal and explain why those options were dismissed. If the public (including groups and agencies) provided input on the alternative(s), include the feedback you received.
- Provide a schedule that includes construction, operation and maintenance activities, including the months or seasons when work would occur.

2. PROJECT AREA AND STRUCTURE INFORMATION

- Provide the geographic coordinates (latitude and longitude) and the physical site address of the generator and the structure(s) and/or infrastructure it would serve.
- Provide a geographic information system (GIS), computer-aided design (CAD), Google Earth files (.kmz), or map or image that clearly shows the boundaries of the project area. If your project area has a complex boundary, a GIS or .kmz file is preferred. The information provided should show the boundaries of all temporary and permanent project activities including staging areas, access routes, any vegetation removal and the affected structure(s) or infrastructure.
- Provide an estimate of the area of ground disturbance in acres or square feet.
- Provide a few representative photographs of the surrounding area to the north, south, east and west of the project area.
- Provide engineering drawings, if available.
- Provide a description of the type, number, size and dimensions of structure(s) to be served by the generator, including photographs of all sides and the year they were originally constructed.
- Describe the location of the generator in relation to the structure (e.g., at rear, side or front of structure).
- Describe adjacent structures, including photographs and the year they were originally constructed.
- Describe any prior improvements or additions that have been made to the structure(s) (e.g., new windows, change in roofing material from original construction), changes to the original location (i.e., relocation) of the structure(s) or other changes to the original design of the structure(s).
- If the structure(s) is designated as historic or is in a designated historic district, provide information on the known historic property/district, as applicable.

3. POTENTIAL IMPACTS ON PEOPLE, THE ENVIRONMENT AND CULTURAL RESOURCES

- Explain any controversy that exists or could exist related to the project.

- Describe any existing or planned public engagement activities for the project.
- Describe any agency coordination and permits you obtained from federal, state or local agencies to implement the project. Provide copies of any coordination materials, permit applications or approvals.
- If any environmental or cultural studies were completed, either for the project or for other projects in the same area, by local, state or federal entities, please provide copies. Studies could include evaluations of cultural resources (e.g., historic, archaeological) or environmental resources (e.g., threatened and endangered species, wetlands, hydrology).
- Describe the project activities in the floodplain, if applicable, including use and occupancy of the facility.
- For non-coastal projects that would include fill or changes to the floodplain, has a hydrologic and hydraulic analysis been conducted? If yes, include the study with your application.
- If the generator is in a floodplain, describe how the generator would be protected from flooding. If the generator were elevated, to what height relative to the flood elevation would the generator be elevated? Note that the flood elevation for critical facilities is the 500-year elevation, if mapped. Examples of critical facilities include schools, hospitals and fire stations.
- Describe any surface waters or wetlands in or near the project area (e.g., ponds, lakes, rivers, streams, wetlands, other waterbodies).
- Describe any measures that would be used to avoid waterbodies or avoid impacting water (e.g., setbacks, cofferdams, silt fence).
- Provide any permits or applications that were developed related to project impacts on surface waters.
- Describe any known hazardous or contaminated materials that may be present in the project area or that are needed to implement the project.
- If your project would use any hazardous materials, describe the BMPs that would be used to minimize exposure of people and the environment to those materials and how the materials would be discarded.
- If your project involves the use of fill, describe the type and source of the fill material.
- If the project would remove vegetation for any reason, describe the type and amount or area of vegetation (e.g., two oak trees, 100 square feet of shrubs).
- Describe how vegetation would be removed, if applicable (e.g., root ball removal, flush cut, dug up).
- Provide photographs of the vegetation to be removed in the project area.
- Would you restore vegetation after the project is complete or does the project include planting or seeding of vegetation? If so, describe where and how it will be planted (e.g., by hand, with machinery, broadcast seeding) and the types (e.g., grasses, trees, shrubs) and species of vegetation that would be planted.
- Would any special techniques be used to ensure survival of the plants/seeds (e.g., mulch, irrigation, protective fencing)?
- List all BMPs to be implemented, as part of the project, to reduce potential impacts.