



FEMA Region 6 Environmental and Historic Preservation (EHP) Guidelines for Hazard Mitigation Assistance (HMA) Applications in Texas

The Federal Emergency Management Agency is required by law to review all grant projects to determine effects on the environment. Some HMA projects that will not result in any physical change to the environment do not require an in depth environmental review. Such projects include the development of Mitigation Plans, public education and training activities, weather radios, and Phase I feasibility studies and assessments. For these projects, a detailed scope of work explaining the activity should be sufficient for FEMA to complete the environmental review.

For all other projects, please provide the items listed based on project type to assist with the environmental review. While these guidelines are as specific as possible, be aware that additional information, studies, design plans, agency coordination and consultation letters, etc. may be needed on a case by case basis depending on the project's specific scope of work and location. These items will help FEMA determine the proposed project's potential to affect natural and cultural resources such as species and critical habitats, migratory flyways, floodplains, wetlands, water and air quality, archeological and historic resources, and viewsheds, to name a few.

If the project is taking place on tribal lands and the Tribe has a Tribal Historic Preservation Officer (THPO), consultation with SHPO is not required and FEMA will consult with the Tribe directly as needed for the project.

Note, the applicant and/or sub-applicant should not consult directly with any Tribes. FEMA will consult with Federally Recognized Tribes directly as needed during the project review process.

Acquisition and Demolition

- Scope of Work Details:
 - GPS and Address for project site(s), including any alternate properties that the sub-applicant wants approved at the time of award. If there are multiple properties, an electronic spreadsheet with addresses and GPS coordinates is needed.
 - Date of construction for all structure(s), including alternate properties.
 - When feasible, maps, photos, etc. to help illustrate project site.
- Agency Consultation Letters:
 - SHPO response needed if (1) structure is 45 years or older at the time of FEMA review; (2) new ground is being disturbed; or (3) project is located in a Historic District. This applies to all properties including alternates.
 - NOTE: If project is taking place on tribal lands and the Tribe has a Tribal Historic Preservation Officer (THPO), consultation with SHPO is not required. FEMA will consult with the Tribe directly as needed for the project.

Elevation

- Scope of Work Details:
 - GPS and Address for project site(s), including any alternate properties that the sub-applicant wants approved at the time of award. If there are multiple properties, an electronic spreadsheet with addresses and GPS coordinates is needed.
 - Date of construction for all structure(s), including alternate properties.
 - Describe current and proposed foundation type.
 - Current and proposed building elevation height.
 - Describe dimensions, acreage, depth of any ground-disturbance.

- Will the structure be elevated in place? Mechanism for elevation (i.e. crib/jack; on fill; 2nd story conversion, etc.)? If the structure will be removed from the foundation and temporarily stored to install new foundation, where will the structure be stored and how will it be transported?
- When feasible, design plans, maps, drawings, photos, etc. to illustrate work to be completed.
- Agency Consultation Letters:
 - SHPO response needed if (1) structure is 45 years or older at the time of FEMA review; (2) new ground is being disturbed; or (3) project is located in a Historic District. This applies to all properties including alternates.
 - NOTE: If project is taking place on tribal lands and the Tribe has a Tribal Historic Preservation Officer (THPO), consultation with SHPO is not required. FEMA will consult with the Tribe directly as needed for the project.
- If project in the floodplain:
 - Scope of work should indicate details on elevation heights.
 - Elevations in the floodplain will require that the sub-applicant notify the public under Executive Order 11988 Floodplain Management. Please provide FEMA with documentation of the public notice (date and media—paper, radio, public meeting, posing in a public building, etc.).
 - Critical facilities must be elevated to the 500-year base flood elevation based on best available information.

Relocation

- Scope of Work Details:
 - GPS coordinates and address for project site(s), including any alternate properties that the sub-applicant wants approved at the time of award. Provide this information for existing site and proposed new site. If there are multiple properties, an electronic spreadsheet with addresses and GPS coordinates is needed.
 - Date of construction for all structure(s), including alternate properties.
 - Provide past site usage information for proposed new site (urban, residential, industrial, agricultural, etc.). Include any site assessments of proposed relocation areas if available.
 - Describe current and proposed foundation type.
 - Current and proposed building elevation height.
 - Describe dimensions, acreage, depth of any ground-disturbance.
 - Will the structure be temporarily stored somewhere other than its existing location? How will it be transported to the proposed new site?
 - When feasible, design plans, maps, drawings, photos, etc. to illustrate work to be completed.
- Agency Consultation Letters:
 - SHPO response needed if (1) structure is 45 years or older at the time of FEMA review; (2) new ground is being disturbed; or (3) project is located in a Historic District. This applies to all properties including alternates.
 - NOTE: If project is taking place on tribal lands and the Tribe has a Tribal Historic Preservation Officer (THPO), consultation with SHPO is not required. FEMA will consult with the Tribe directly as needed for the project.

Mitigation Reconstruction

- Scope of Work Details:
 - GPS coordinates and address for project site(s), including any alternate properties that the sub-applicant wants approved at the time of award. If there are multiple properties, an electronic spreadsheet with addresses and GPS coordinates is needed.
 - Date of construction for all structure(s), including alternate properties.
 - Describe current and proposed foundation type.
 - Current and proposed building elevation height.
 - Describe dimensions, acreage, depth of any ground-disturbance.
 - Will the new structure be built on the same footprint as the previous structure?
 - Previous footprint square footage and proposed footprint square footage.
 - When feasible, design plans, maps, drawings, photos, etc. to illustrate work to be completed.
- Agency Consultation Letters:
 - SHPO response needed if (1) structure is 45 years or older at the time of FEMA review; (2) new ground is being disturbed; or (3) project is located in a Historic District. This applies to all properties including alternates.
 - NOTE: If project is taking place on tribal lands and the Tribe has a Tribal Historic Preservation Officer (THPO), consultation with SHPO is not required. FEMA will consult with the Tribe directly as needed for the project.
- If project in the floodplain:
 - Scope of work should indicate details on elevation heights.
 - Elevations in the floodplain will require that the sub-applicant notify the public under Executive Order 11988 Floodplain Management. Please provide FEMA with documentation of the public notice (date and media—paper, radio, public meeting, posing in a public building, etc.).
 - Critical facilities must be elevated to the 500-year base flood elevation based on best available information.

Facility Improvements and Retrofits

- Scope of Work Details:
 - GPS coordinates and address for project site(s).
 - Date of construction for all structure(s).
 - Provide complete project details.
 - Will improvements require going beyond the original footprint of the existing structure?
 - Dimensions, acreage, and depth of ground-disturbance.
 - Indicate location of work in relation to building: inside, outside, on top, below, etc.
 - When feasible, design plans, maps, drawings, photos, etc. to illustrate work to be completed.
- Agency Consultation Letters:
 - SHPO response needed if (1) structure is 45 years or older at the time of FEMA review; (2) new ground is being disturbed; or (3) project is located in a Historic District.
 - NOTE: If project is taking place on tribal lands and the Tribe has a Tribal Historic Preservation Officer (THPO), consultation with SHPO is not required. FEMA will consult with the Tribe directly as needed for the project.

Flood Risk Reduction Projects/Bank Stabilization

- Scope of Work Details:
 - GPS coordinates and address (if available) for project site(s).
 - Date of construction for existing drainage structures and/or bridges if affected.
 - Is the project an upgrade to an existing system or does it involve the installation of a new drainage system? Explain any drainage that is already in place in the project area (ditches, curb and gutter sewers, pumps, etc.).
 - If stream work is involved, is the current stream natural or altered by manmade structures (dams, weirs, concrete lining, culverts, rip rap, etc.)? What length of natural channel will be modified and what are the modifications? If current channel is already modified, what additional improvements are proposed? Are any streams being rerouted? Explain in detail the location and mechanisms for achieving.
 - Describe any current or proposed bank stabilization measures. FEMA recommends incorporating bioengineering techniques (use of vegetation or a combination of vegetation and construction materials; the use of living and non-living plant materials in combination with natural and synthetic support materials).
 - If a detention pond is being excavated, describe current land use at proposed site.
 - Acreage, depth of new ground-disturbance and excavation.
 - Linear feet of stream improvements if applicable.
 - What is the capacity of any existing system and what will be the capacity of the proposed new system?
 - Describe where the water will ultimately discharge (an existing water main, a channel, a detention pond, etc.) Does the receiving system have enough capacity to handle the new increase in flow?
 - Will property need to be acquired for project? If so who owns property and are they a willing seller? Are there deed restrictions or easements on that land?
 - When feasible, design plans, flow calculations, H&H studies, maps, drawings, photos, etc. to illustrate work to be completed.

- Agency Consultation Letters:
 - SHPO response needed for all drainage projects.
 - NOTE: If project is taking place on tribal lands and the Tribe has a Tribal Historic Preservation Officer (THPO), consultation with SHPO is not required. FEMA will consult with the Tribe directly as needed for the project.
 - If project located within a wetland or other water of the United States, USACE response including any permit documentation. If USACE requires an individual permit under the Clean Water Act, the permit will need to be secured prior to EHP approval of the HMA project.
 - Local floodplain administrator response if project in or affects the floodplain.

- If project in the floodplain:
 - Drainage/bank stabilization projects in the floodplain or that will impact the floodplain will require that the sub-applicant notify the public under Executive Order 11988 Floodplain Management. Please provide FEMA with documentation of the public notice (date and media—paper, radio, public meeting, posting in a public building, etc.).
 - Drainage/bank stabilization projects in the floodplain or that will impact the floodplain will require a determination of whether or not the project will have negative upstream and downstream impacts. In order to make this determination, FEMA will request a Hydraulic and Hydrologic Engineering Study.

Generators

- Scope of Work Details:
 - GPS coordinates and address for generator installation and/or storage site(s).
 - Date of construction for structure(s).
 - Is the generator internal or external to the building?
 - Is it being placed on an existing pad or a new pad? Is it being placed on an existing or new elevated structure? Describe any protective enclosure that will be installed.
 - Describe dimensions, depth of any ground-disturbance.
 - Is the generator fixed or portable?
 - Maps, photos, etc. to illustrate generator site.
- Agency Consultation Letters:
 - SHPO response needed if (1) structure is 45 years or older at the time of FEMA review; (2) new ground is being disturbed; or (3) project is located in a Historic District. This applies to all properties including alternates.
 - NOTE: If project is taking place on tribal lands and the Tribe has a Tribal Historic Preservation Officer (THPO), consultation with SHPO is not required. FEMA will consult with the Tribe directly as needed for the project.
- If project in the floodplain:
 - Scope of work should indicate details on generator elevation heights.

Communication and Warning Systems

- Scope of Work Details:
 - GPS coordinates and address, if available, for project site(s).
 - Where is the device being mounted? On a pole, tower, building, etc.?
 - Provide tower or pole heights.
 - Are new poles being installed? Will they replace existing poles in the same location or will a new hole be required?
 - Are lattice or guy wires being installed?
 - Date of construction for building if equipment being installed on a building.
 - Power source. Will new above or below ground utilities be installed? If so, details on location and dimensions of ground disturbance.
 - Maps, photos, etc. to illustrate work to be completed.
- Agency Consultation Letters:
 - SHPO response needed for all new towers, sirens, messaging systems, and warning systems when there is ground disturbance.
 - For collocation on an existing pole, building, or structure and there is no ground disturbance, SHPO response needed if (1) structure is 45 years or older at the time of FEMA review; or (2) project is located in a Historic District.
 - NOTE: If project is taking place on tribal lands and the Tribe has a Tribal Historic Preservation Officer (THPO), consultation with SHPO is not required. FEMA will consult with the Tribe directly as needed for the project.

Community Safe Rooms

- Scope of Work Details:
 - GPS and address for project site(s).
 - Date of construction of building(s) where safe room being installed.
 - Safe Room Location:
 - Inside an existing structure.
 - As part of a larger structure being constructed.
 - Connected to an existing structure.
 - As a stand alone facility.
 - Is structure being installed on original or new footprint?
 - Gross square footage of the safe room.
 - Dimensions, acreage of ground-disturbance.
 - Provide complete project details. For example, will access roads and parking lots be installed? Will new above or below ground utilities be installed?
 - Past site usage information.
 - When feasible, design plans, maps, drawings, photos, etc. to illustrate work to be completed.
- Agency Consultation Letters:
 - SHPO response needed if (1) structure is 45 years or older at the time of FEMA review; (2) ground is being disturbed; and/or (3) project is located in a Historic District.
 - NOTE: If project is taking place on tribal lands and the Tribe has a Tribal Historic Preservation Officer (THPO), consultation with SHPO is not required. FEMA will consult with the Tribe directly as needed for the project.
 - Local floodplain administrator response if project in or affects the floodplain.
- If project in the floodplain:
 - Scope of work should indicate details on elevation heights. Community safe rooms are considered critical facilities, and if they are in the floodplain they must be elevated to the 500-year base flood elevation per best available information.
 - Activities in the floodplain will require that the sub-applicant notify the public under Executive Order 11988 Floodplain Management. Please provide FEMA with documentation of any early public notice (date and media—paper, radio, public meeting, posting in a public building, etc.).

Individual Safe Rooms

- Scope of Work Details:
 - If TDEM's Individual Safe Room Rebate Program Handbook is in effect for the HMA application, FEMA will only need the number and county locations for the proposed safe rooms.
 - If TDEM's handbook is not in effect, FEMA EHP needs the following:
 - GPS and address for each residence where a safe room will be installed. If there are multiple properties, an electronic spreadsheet with addresses and GPS coordinates is needed.
 - Date of construction for structure(s) where safe room being installed.
 - Is safe room above ground, underground, or being installed within an existing structure?
 - Indication of whether any homes are in a historic district.
 - When feasible, maps, drawings, photos, etc. to illustrate work to be completed.
- Agency Consultation Letters:
 - If TDEM's Individual Safe Room Rebate Program Handbook is in effect for the HMA application, SHPO consultation will be conducted per procedures outlined in that handbook.
 - SHPO response needed if (1) installing an exterior safe room that abuts or attaches to a building or that is highly visible from a public right-of-way (i.e., an above ground safe room in a front or

side yard) when the building is 45 years old or older at the time of FEMA review or is located in a historic district; or (2) installing a safe room in undisturbed soils.

- NOTE: If project is taking place on tribal lands and the Tribe has a Tribal Historic Preservation Officer (THPO), consultation with SHPO is not required. FEMA will consult with the Tribe directly as needed for the project.
- If project in the floodplain:
 - Scope of work should indicate details on elevation heights.
 - Activities in the floodplain will require that the sub-applicant notify the public under Executive Order 11988 Floodplain Management. Please provide FEMA with documentation of any early public notice (date and media—paper, radio, public meeting, posting in a public building, etc.).

Wildfire Mitigation

- Scope of Work Details:
 - GPS coordinates and address for project site(s) and/or a boundary map of proposed work area.
 - Date of construction for structure(s) in project area.
 - Provide complete project details. Describe type and amount (i.e. acreage, dimensions, etc.) of vegetation to be removed and/or modified. Does the project involve physical or chemical treatments, or both? What is the method of removal (bulldozer, mowing, individual tree removal, etc.)? How will the vegetation be disposed of—landfill, burning, temporary staging site, mulching, other? Will property need to be acquired for project? If so who owns property and are they a willing seller? Are there deed restrictions or easements on that land?
 - When feasible, design plans, maps, drawings, photos, etc. to illustrate work to be completed.
 - Description of other current or future vegetation management activities in the area being funded by other entities.
- Agency Consultation Letters:
 - SHPO response needed if (1) structure is 45 years or older at the time of FEMA review; (2) ground is being disturbed; or (3) project is located in a Historic District.
 - NOTE: If project is taking place on tribal lands and the Tribe has a Tribal Historic Preservation Officer (THPO), consultation with SHPO is not required. FEMA will consult with the Tribe directly as needed for the project.
 - USACE response needed if project in a wetland or in/near or otherwise affects a water of the U.S.
 - Local floodplain administrator response if project in or affects the floodplain. Removal of significant amounts of vegetation and groundcover can affect stormwater runoff.
 - Biological surveys, site assessments, or other studies that may assist in environmental review.
- If project in the floodplain:
 - Activities in the floodplain will require that the sub-applicant notify the public under Executive Order 11988 Floodplain Management. Please provide FEMA with documentation of any early public notice (date and media—paper, radio, public meeting, posting in a public building, etc.).

Extraordinary Circumstances

If any of the following circumstances exists with any project, an Environmental Assessment is likely required. This list is not all inclusive and other project complexities may trigger an Environmental Assessment. FEMA will make the determination as to whether an Environmental Assessment is necessary.

- (i) A potentially significant effect on public health or safety.
- (ii) A potentially significant effect on species or habitats protected by the ESA, Marine Mammal Protection Act, Migratory Bird Treaty Act, Magnuson-Stevens Fishery Conservation and Management Act, or other law protecting a species or habitat.
- (iii) A potentially significant effect on historic properties (e.g., districts, sites, buildings, structures, or objects) that are listed in or eligible for listing in the National Register of Historic Places, affects traditional cultural properties or sacred sites, or leads to the loss or destruction of a significant scientific, cultural, or historical resource.
- (iv) A potentially significant effect on an environmentally sensitive area.
- (v) A potential or threatened violation of a Federal, State, or local law or requirement imposed to protect the environment. Some examples of other requirements to consider are: a local noise control ordinance; the requirement to conform to an applicable State Implementation Plan for air quality standards; Federal, Tribal, State, or local requirements to control hazardous or toxic substances; and environmental permits.
- (vi) An effect on the quality of the human environment that is likely to be highly controversial in terms of scientific validity, likely to be highly uncertain, or likely to involve unique or unknown environmental risks. This also includes effects that may result from the use of new technology or unproven technology. Controversy over, including public opposition to, a proposed action absent any demonstrable potential for significant environmental impacts does not itself constitute an extraordinary circumstance.
- (vii) Extent to which a precedent is established for future actions with significant effects.
- (viii) Significantly greater scope or size than normally experienced for this particular category of action.
- (ix) Potential for significant degradation of already existing poor environmental conditions. Also, initiation of a potentially significant environmental degrading influence, activity, or effect in areas not already significantly modified from their natural condition.
- (x) Whether the action is related to other actions with individually insignificant, but cumulatively significant impacts.

Acronyms

EHP—Environmental and Historic Preservation
FEMA—Federal Emergency Management Agency
HMA—Hazard Mitigation Assistance
SHPO—State Historic Preservation Office
TDEM—Texas Division of Emergency Management
THPO—Tribal Historic Preservation Officer
USACE—United States Army Corps of Engineers