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FEMA Region 6 EHP Guidelines for Hazard Mitigation Assistance (HMA) Applications in Louisiana

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 Action Plans, public education and training activities, 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.

These are general guidelines based on project type and potential for environmental impacts to both the property and surrounding environments. Proposed projects have the potential to affect species and critical habitats, migratory flyways, floodplains, wetlands, water and air quality, archeological and historic resources, and viewsheds, to name a few. Additional information, studies, design plans, consultation letters, etc. may be needed on a case by case basis depending on the project's specific scope of work and location.

Acquisition and Demolition

- Scope of Work Details:
 - GPS and address for project site(s), including any alternate properties. If there are multiple properties, an electronic spreadsheet with addresses and GPS coordinates is needed.
 - Age of structure(s), including alternate properties.
 - Open space use if known.
 - Maps, photos, etc. to illustrate project site.

- Agency Consultation Letters:
 - SHPO response needed for any structures that are 45 years or older, including alternate properties, and for all properties located in a Historic District.
 - USACE response needed if project in a wetland.
 - Louisiana Department of Environmental Quality response.
 - Sub-Applicant should provide FEMA with copies of USFWS letters and response, if available.

- FIRM with project location marked. Panel number and effective date should be included.

Elevation

- Scope of Work Details:
 - GPS and Address for project site(s), including alternate properties. If there are multiple properties, an electronic spreadsheet with addresses and GPS coordinates is needed.



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- Age of Structure(s), including alternate properties.
 - Foundation type, dimensions, acreage, depth of ground-disturbance.
 - Current and proposed building elevation height.
 - How will the work be done? 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?
 - 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; (2) new ground is being disturbed; or (3) project is located in a Historic District.
 - 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.
 - Louisiana Department of Environmental Quality response.
 - Louisiana Department of Wildlife and Fisheries response.
 - Sub-Applicant should provide FEMA with copies of USFWS letters and response, if available.
 - FIRM with project location marked. Panel number and effective date should be included.
 - If project located within the floodplain, provide alternative actions (including “no action” alternative) and narrative rationale for the decision to pursue the primary project.
 - If project in the floodplain, scope of work should indicate details on elevation heights.
 - Critical facilities must be elevated to the 500-year elevation.
 - 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 any early public notice (date and media—paper, radio, public meeting, posting in a public building, etc.).

Relocation

- Scope of Work Details:
 - GPS coordinates and address for project site(s), including alternate properties. 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.
 - Age of 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.



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- 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?
- Design plans, maps, drawings, photos, etc. to illustrate work to be completed.
- Agency Consultation Letters:
 - SHPO response required if (1) structure is 45 years or older; (2) new ground is being disturbed; or (3) project is located in a Historic District.
 - USACE response needed if any portion of the project (current and proposed site) is in a wetland or in/near or otherwise affects a water of the U.S.
 - NRCS response if developing in a previously undisturbed rural or agricultural area that contains prime or unique farmland.
- FIRM with project location marked. Panel number and effective date should be included.
 - Include current location and proposed location on the FIRM and clearly designate which is which.
 - HMA programmatic guidance may prevent relocating a structure to an area within the 100 year floodplain.

Mitigation Reconstruction

- Scope of Work Details:
 - GPS coordinates and address for project site(s), including alternate properties. If there are multiple properties, an electronic spreadsheet with addresses and GPS coordinates is needed.
 - Age of all structure(s), including alternate properties.
 - Does a structure currently exist at the project site? Is FEMA paying for demolition?
 - 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.
 - Design plans, maps, drawings, photos, etc. to illustrate work to be completed.
- Agency Consultation Letters:
 - SHPO response required if (1) structure is 45 years or older; (2) new ground is being disturbed and reconstruction is taking place on a new footprint; or (3) project is located in a Historic District.
 - USACE response needed if any portion of the project is in a wetland or in/near or otherwise affects a water of the U.S.
 - NRCS response if developing in a previously undisturbed rural or agricultural area that contains prime or unique farmland.



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- FIRM with project location marked. Panel number and effective date should be included.
 - If project located within the floodplain, provide alternative actions (including “no action” alternative) and narrative rationale for the decision to pursue the primary project.
 - If project in the floodplain, scope of work should indicate details on elevation heights.
 - Critical facilities must be elevated to the 500-year elevation.
 - 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 any early public notice (date and media—paper, radio, public meeting, posting in a public building, etc.).

Facility Improvements and Retrofits

- Scope of Work Details:
 - GPS and Address for project site(s).
 - Age of Structure(s).
 - Is structure being installed on original or new footprint?
 - Dimensions, acreage and depth of ground-disturbance, building height.
 - For improvements, indicate location in relation to building: inside, outside, on top, below, etc.
 - 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.
 - 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; (2) ground is being disturbed; and/or (3) project is located in a Historic District.
 - USACE response needed if project in a wetland or in/near or otherwise affects a water of the U.S.
 - NRCS response if developing in a previously undisturbed rural or agricultural area that contains prime or unique farmland.
 - Local floodplain administrator response if project in or affects the floodplain.
 - Louisiana Department of Environmental Quality response.
 - Sub-Applicant should provide FEMA with copies of USFWS letters and response, if available.
- FIRM with project location marked. Panel number and effective date should be included.
 - If project located within the floodplain, provide alternative actions (including “no action” alternative) and narrative rationale for the decision to pursue the primary project.



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- 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.).

Drainage and Channelization

- Scope of Work Details:
 - GPS and Address (if available) for project site(s).
 - Is the project an upgrade to an existing system or does it involve the installation of new drainage systems?
 - Acreage, depth of new ground-disturbance.
 - Pre-existing vs. proposed new system capacity and footprint.
 - Description of outfall and where water will discharge.
 - Age of existing drainage structures.
 - Design plans, flow calculations, maps, drawings, photos, etc. to illustrate work to be completed.
- Agency Consultation Letters:
 - SHPO response required if (1) structure is 45 years or older; (2) new ground is being disturbed; or (3) project is located in a Historic District.
 - USACE response needed if any portion of the project is in a wetland or in/near or otherwise affects a water of the U.S.
 - Louisiana Department of Environmental Quality response.
 - NRCS response if developing in a previously undisturbed rural or agricultural area that contains prime or unique farmland.
 - Local floodplain administrator response if project in or affects the floodplain.
 - Louisiana Department of Wildlife and Fisheries response.
 - Sub-Applicant should provide FEMA with copies of USFWS letters and response, if available.
- FIRM with project location marked. Panel number and effective date should be included.
 - If project located within the floodplain, provide alternative actions (including “no action” alternative) and narrative rationale for the decision to pursue the primary project.
 - Work 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.).



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Generators

- Scope of Work Details:
 - GPS and Address for generator installation and/or storage site(s).
 - Age of Structure(s).
 - Is the generator internal or external to the building?
 - Is it being placed on an existing pad or a new pad?
 - 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; (2) ground is being disturbed; and/or (3) the structure is located a Historic District.
 - USACE letter needed if project in a wetland or in/near a water body.
 - Louisiana Department of Environmental Quality letter.

- FIRM with generator location marked. Panel number and effective date should be included.
 - If project located within the floodplain, provide alternative actions (including “no action” alternative) and narrative rationale for the decision to pursue the primary 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.).

Communication and Warning Systems

- Scope of Work Details:
 - GPS and Address, if available, for project site(s). If there are multiple sites, an electronic spreadsheet with addresses and GPS coordinates is needed.
 - 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?
 - Age of building if co-locating equipment.
 - Provide complete project details. For example, will new above or below ground utilities be installed?
 - Maps, photos, etc. to illustrate work to be completed.



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- Agency Consultation Letters:
 - SHPO response needed if (1) structure is 45 years or older; (2) new ground is being disturbed; and/or (3) project is located in a Historic District.
 - Louisiana Department of Wildlife and Fisheries response.
 - Louisiana Department of Environmental Quality response.
 - Sub-Applicant should provide FEMA with copies of USFWS letters and response, if available.
- FIRM with project location marked. Panel number and effective date should be included.
 - If project located within the floodplain, provide alternative actions (including “no action” alternative) and narrative rationale for the decision to pursue the primary project.
 - 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.).

Community Safe Rooms

- Scope of Work Details:
 - GPS and address for project site(s).
 - Age of structure(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.
 - 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; (2) ground is being disturbed; and/or (3) project is located in a Historic District.
 - USACE response needed if project in a wetland.
 - NRCS response if developing in a previously undisturbed rural or agricultural area that contains prime or unique farmland.
 - Local floodplain administrator response if project in or affects the floodplain.
 - Louisiana Department of Environmental Quality response.
 - Louisiana Department of Wildlife and Fisheries response.



- Sub-Applicant should provide FEMA with copies of USFWS letters and response, if available.
- FIRM with project location marked. Panel number and effective date should be included.
 - If project located within the 100- or 500-year floodplain, provide alternative actions (including “no action” alternative) and narrative rationale for the decision to pursue the primary project.
 - If project in the floodplain, scope of work should indicate details on elevation heights. Community safe rooms are considered critical facilities and must be elevated to the 500-year flood elevation.
 - 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.).

Please Note: FEMA Mitigation Interim Policy, MRR-2-09-1, "Hazard Mitigation Assistance for Safe Rooms" and Publications 320 and 361 outline specific flood hazard siting limitations. To be eligible for funding, FEMA will only consider applications for residential, non-residential, and community safe rooms located outside the following high hazard areas:

- The Coastal High Hazard Area (VE zones) or other areas known to be subject to high-velocity wave action; or
- Areas seaward of the Limit of Moderate Wave Action (LiMWA) where mapped, also referred to as the Coastal A Zone in ASCE 24-05, or
- Floodways, or
- Areas subject to coastal storm surge inundation associated with a Category 5 hurricane (where applicable, these areas should be mapped areas studied by the U.S. Army Corps of Engineers (USACE), NOAA, or other qualified sources).

Individual Safe Rooms

- Scope of Work Details:
 - 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.
 - Age of 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.
 - An overall map with all safe rooms plotted is very helpful if available.



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- Agency Consultation Letters:
 - SHPO response needed if (1) structure is 45 years or older; (2) ground is being disturbed; and/or (3) project is located in a Historic District.
 - USACE response needed if project in a wetland.
- FIRM with project location marked. Panel number and effective date should be included.
 - 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.).

Please Note: FEMA Mitigation Interim Policy, MRR-2-09-1, "Hazard Mitigation Assistance for Safe Rooms" and Publications 320 and 361 outline specific flood hazard siting limitations. To be eligible for funding, FEMA will only consider applications for residential, non-residential, and community safe rooms located outside the following high hazard areas:

- The Coastal High Hazard Area (VE zones) or other areas known to be subject to high-velocity wave action; or
- Areas seaward of the Limit of Moderate Wave Action (LiMWA) where mapped, also referred to as the Coastal A Zone in ASCE 24-05, or
- Floodways, or
- Areas subject to coastal storm surge inundation associated with a Category 5 hurricane (where applicable, these areas should be mapped areas studied by the U.S. Army Corps of Engineers (USACE), NOAA, or other qualified sources).

In addition, residential and non-residential safe rooms consistent with FEMA Publication 320 may not be located in:

- Areas subject to coastal storm surge inundation associated with a Category 5 34 hurricane (where applicable, these areas should be mapped areas studied by the 35 U.S. Army Corps of Engineers (USACE), NOAA, or other qualified sources).

Wildfire Mitigation

- Scope of Work Details:
 - GPS coordinates and address for project site(s) and/or a boundary map of proposed work area.
 - Age of 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, other? Will property need to be acquired for



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project? If so who owns property and are they a willing seller? Are there deed restrictions or easements on that land?

- 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; (2) ground is being disturbed; or (3) project is located in a Historic District.
 - USACE response needed if project in a wetland or in/near or otherwise affects a water of the U.S.
 - NRCS response if developing in a previously undisturbed rural or agricultural area that contains prime or unique farmland.
 - Local floodplain administrator response if project in or affects the floodplain. Removal of significant amounts of vegetation and groundcover can effect stormwater runoff.
 - Louisiana Department of Environmental Quality response.
 - Louisiana Department of Wildlife and Fisheries response.
 - Sub-Applicant should provide FEMA with copies of USFWS letters and response, if available.

- FIRM with project location marked. Panel number and effective date should be included.
 - 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.).



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Extraordinary Circumstances

Note: 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.

- I. Greater scope or size than normally experienced for a particular category of action.
- II. Actions with a high level of public controversy.
- III. Potential for degradation, even though slight, of already existing poor environmental conditions.
- IV. Employment of unproven technology with potential adverse effects or actions involving unique or unknown environmental risks.
- V. Presence of endangered or threatened species or their critical habitat, or archaeological, cultural, historical or other protected resources.
- VI. Presence of hazardous or toxic substances at levels which exceed Federal, state or local regulations or standards requiring action or attention.
- VII. Actions with the potential to affect special status areas adversely or other critical resources such as wetlands, coastal zones, wildlife refuge and wilderness areas, wild and scenic rivers, sole or principal drinking water aquifers.
- VIII. Potential for adverse effects on health or safety.
- IX. Potential to violate a federal, state, local or tribal law or requirement imposed for the protection of the environment.
- X. Potential for significant cumulative impact when the proposed action is combined with other past, present and reasonably foreseeable future actions, even though the impacts of the proposed action may not be significant by themselves.

Acronyms

EHP—Environmental and Historic Preservation
FEMA—Federal Emergency Management Agency
FIRM—Flood Insurance Rate Map
HMA—Hazard Mitigation Assistance
LDEQ—Louisiana Department of Environmental Quality
NRCS—Natural Resources Conservation Service
SHPO—State Historic Preservation Office.
USACE—United States Army Corps of Engineers
USFWS—United States Fish and Wildlife Service