



1. **Know your Resources.** The Temporary Housing Resource CD contains a great deal of information that may be used directly in the preparation of NEPA compliance documentation and the required Environmental Assessment. Review all of the resources and relevant regulations and guidance **BEFORE** you are deployed on a housing mission.
2. **Identify your local staff** including: Biologists, Archaeologists, GIS specialists, HTRW specialists, Sociologists and anyone who will be providing the local information for the EA. You cannot be expected to be the local expert in these fields; rely on those who are there. They will also know **WHO** to coordinate with and will facilitate that. Have digital forms (phone memos etc.) ready for them to fill in so you can include all coordination in the EA as part of the file and not have to copy separate pages.
3. **Get out and identify all the potential housing AND staging areas.** The local sponsor must provide the sites, but as you are in the field identify all sites that have good physical characteristics. This will exclude HTRW sites, wetlands, steep slopes, or other sites that would be difficult to construct on, but could include sites that are not on the list because they are privately owned, zoned for other uses or have other non-physical constraints to construction. These constraints **CAN CHANGE!!!** As you visit sites that look like they have potential, identify these sites and their constraints and include them in the EA as alternative sites (with close coordination with your FEMA counterpart). If these sites are in the EA they could be used; if they are **NOT** in the EA they absolutely will not be used unless you write another EA and there is **NO TIME** for that.
4. **Get good figures lined up.** It's important to be able to have some general location maps, clear local site maps and draft lot layouts to provide a clear idea of what the project scope is. These EA's are all the public sees and they must convey all of the information available. If information is not available public trust is lost. Here's where the local GIS staff can be a lifesaver with digital orthophotos, USGS digital raster graphics (quad maps) or other readily available background figures. Let the GIS person develop the graphics and encourage them to develop a project or database and create layouts within that. Don't ask for maps, ask for layouts!!!
5. **Get IM involved at the District Level ASAP!!** They will be able to set up a web site for your draft and final EA, set up mailboxes and phone lines **DEDICATED** to taking comments. Email comments can easily be copied and incorporated into the

EA (vs. letters that must be copied individually). This saves TIME and \$\$ at the printers.

6. Ensure that EA is Clear and Thorough. In accordance with the Stafford Act and FEMA's regulation, 44 CFR Part 10, FEMA uses the National Environmental Policy Act (NEPA) review process to ensure compliance with the other relevant environmental and historic preservation laws, regulations, and Executive Orders. You can help expedite the review by including any or all of the following existing documentation as a part of the environmental review document.

- A clear written description of the entire scope of work, including any alternatives that may be under consideration, and any additional work, not funded by FEMA, that will be performed at substantially the same time. Include any studies, plans, drawings, sketches, or schematics, as may be available, to help understand the entire project.
- Photos as required showing the proposed project area in the context of its surroundings. If the project is a building, show all sides of the entire building (at least from opposite corners), and the context of the building in its setting including the surrounding buildings. If the project is in a rural setting, show the project area in the foreground with the background of the surrounding area in all four directions.
- Location maps (e.g., USGS maps, Thomas Bros. Maps or City maps), as necessary to show the undertaking in the context of its surroundings. For projects in rural settings or for projects with ground disturbing activities, USGS maps are mandatory.
- Documentation of any other Agency's environmental determinations within the scope of the project and surrounding areas.

A. National Historic Preservation Act

- Document the date of construction for the original, existing facility (building permit records, tax records, toilet tank lids, newspaper accounts, architectural drawings, etc.), if readily available.
- Plans showing the limits of proposed excavations or other ground disturbing activities associated with the project.
- Location maps, in addition to those provided above, showing the project within local, state, or national historic districts.
- Local, state, or national landmark listings of historic properties within the project area, including the National Register of Historic Places.
- Any existing cultural resource surveys or reports describing the archaeological/historic properties (e.g., archaeological sites, historic buildings, historic landmarks, etc.) that exist within the project area or could be affected by the project.
- Copies of any available plans for the existing facility as well as documentation of any changes made since the original construction.

B. Endangered Species Act

- Documentation (e.g., Data Base Report, Biological Assessment, Initial Study, Environmental Impact Report) evaluating biological resources that might be affected by the project activities.
- Document coordination with other agencies (e.g., U.S. Fish and Wildlife Service, National Marine Fisheries Service, etc.), including reports, studies and recommendations.
- Species lists identifying endangered, threatened species, and proposed species that might be affected by the proposed project.

C. Fish and Wildlife Coordination Act

- Detailed plans and studies for the control or modification of a natural stream or body of water.
- Documentation of coordination with other agencies (e.g., USFWS, NOAA and NMFS, etc.), including reports, studies and recommendations.
- Detailed maps, reports and studies documenting the scope of the project and surrounding areas including construction of dams, levees, impoundments, stream relocation, and water diversion structures
- Detailed descriptions and related reports and studies of proposed discharges of pollutants including industrial, mining, and municipal wastes or dredged and fill material into a body of water or wetlands.
- Recommendations of the USFWS and affected state(s) for protecting fish and wildlife.

D. Wild and Scenic Rivers Act

- Detailed plans and studies for the construction of any water resource project (e.g., dam, water conduit, reservoir, powerhouse, transmission line, discharge to waters, or development project).
- Documentation of coordination with other agencies (e.g., NPS, BLM, USFWS and FS, etc.), including reports, studies and recommendations.
- Detailed maps, reports and studies documenting the scope of the project and surrounding areas including scenic, recreational, geological, fish and wildlife, historic, cultural, or similar areas.

E. Coastal Zone Management Act

- Detailed maps, reports and studies documenting the scope of the project and surrounding areas as they relate to the nation's coastal zones (e.g., islands, beaches, transitional and inter tidal areas, salt marshes, etc. including any land extending inward to the extent necessary to control shorelines).
- Documentation of coordination with other agencies (e.g., Office of Ocean and Coastal Resource Management, USFWS, NOAA, etc.) and the state including reports, studies and recommendations.
- Documentation of compliance/consistency with state coastal management programs and plan.

F. Executive Order 11988 - Floodplain Management, May 24, 1977

- Detailed maps (e.g., FIRM, FBFM, State designated floodway maps, etc.) defining floodplain/floodway boundaries within the project area.
- Reports and studies (e.g., hydrology, hydraulics, etc.) documenting the scope of the project and surrounding areas as they relate to the occupancy or modification of floodplains including direct and indirect effects.
- Documentation of compliance/consistency with federal, state, local and county floodplain management programs and plans.
- Documentation of coordination with other agencies (e.g., USACE, NRCS, DWR, USBR, NFIP, USFWS, DF&G, etc.), including reports, studies and recommendations.
- Documentation of any Public Notices or public meetings.

G. Executive Order 11990 - Protection of Wetlands, May 24, 1977

- Detailed maps (e.g., USACE, USFWS Wetland Maps) defining wetland boundaries within the project area.
- Reports and studies (e.g., wetland assessment, hydrology, hydraulics, etc.) documenting the scope of the project and surrounding areas as they relate to the occupancy or modification of wetlands including direct and indirect effects.
- Documentation of compliance/consistency with federal, state, local and county floodplain management programs and plans.
- Documentation of coordination with other agencies (e.g., USACE, NRCS, DWR, USBR, NFIP, USFWS, DF&G, etc.), including reports, studies and recommendations.
- Documentation of any Public Notices or public meetings.

H. Executive Order 12898 - Environmental Justice for Low Income and Minority Populations

- Document coordination with other agencies (e.g., US Census Bureau, Local and Community Planning and Development Agencies, etc.) including reports, studies and recommendations.
- Reports and studies (e.g., traffic, noise, odor, etc.) documenting the scope of the project and surrounding areas as they relate to low income and minority populations including direct and indirect effects.
- Census data and income information on affected populations (e.g., location of Section 8 Housing, etc.).

I. Clean Water Act

- Section 404 of the Clean Water Act is administered by the U.S. Army Corps of Engineers.
- Project applicants are responsible for obtaining and complying with Section 404 permits prior to completion of the environmental document.
- Information and conditions of the permit must be included in the environmental document.

J. Clean Air Act

- Project must incorporate potential air impacts, both short and long term.

- Include attainment status of the project area.
- Any road or bridge projects that include capacity improvements and are located in non-attainment areas must comply with air quality conformity and be coordinated with the local metropolitan planning organization.

K. Coastal Barrier Resources Act (CBRA)

- CBRA restricts Federal expenditures and financial assistance that encourage development of coastal barriers so that damage to property, fish, wildlife, and other natural resources associated with the coastal barrier is minimized.
- CBRA is under the jurisdiction of the U.S. Fish and Wildlife Service (USFWS).
- USFWS must be consulted as a part of the EA process if the project is located within a CBRA unit.
- CBRA units are shown on floodplain maps. CBRA only applies to the Great Lakes, the Atlantic coast, and the Gulf Coast. Many of the Pacific coast states have similar state laws, but are not under CBRA.

L. Other Relevant Laws and Environmental Regulations – Historically, FEMA projects are affected by the above listed environmental and historic preservation laws. However, there are many other environmental and/or historic preservation laws that may be applicable. Only include the applicable laws in the EA document. Some examples of other laws include:

- Prime Farmland Act
- Federal Insecticide, Fungicide, and Rodenticide Act
- Resource Conservation and Recovery Act
- Comprehensive Environmental Response, Compensation, and Liability Act
- Rivers and Harbors Act
- Marine Mammal Protection Act
- Ocean Dumping Ban Act
- Magnuson-Stevens Fisheries Conservation Act
- Archeological and Historic Preservation Act
- Archeological Resources Protection Act
- American Indian Religious Freedom Act
- Native American Graves protection and Repatriation Act
- Americans with Disabilities Act

7. Other things to add to EA (if at all possible).

A. Attach the Public Notification (separate page, usually a copy from a newspaper)

B. References (agencies and organizations consulted; separate page, can number sources but not required)

C. Appendices: There may be a need for several appendices, including public notices and flyers, interagency correspondence, maps, technical data, and public comments.

D. Public Comments: Attach all public comments and agency responses in a separate appendix to the Environmental Assessment

E. Regarding the definition of temporary housing:

“The development of temporary emergency housing includes clearing, grubbing, grading and/or filling as needed throughout the site except for a [x]-foot wide buffer of existing vegetation which will be left around the perimeter of the site. The site would be used for development of temporary emergency housing or for staging of trailers, equipment and materials.”

Why?

a. Leaving a vegetative buffer is always more successful than planting. The NEPA team & design engineers should determine the width of the buffer. We don't want to commit to re-planting when we can leave it alone except for ingress and egress. In the Los Alamos mission (Cerro Grande fire) the site was desert, and leaving plants alone was preferable to replanting. Landscaping can also create a sense of permanence to the development, which is often a red flag to neighbors who expect the housing to remain only temporarily.

b. While staging doesn't require an EA (it is considered a Categorical Exclusion [CatEx] under FEMA regulations) a housing site described in the EA might be needed for use as a staging area because of its location, physical characteristics. If FEMA will let you, include the use of all the sites for either housing or staging up front. Then time will not be lost preparing CatEx forms, because you have already described the site in the EA. Note that any and all staging areas must be restored to their original condition.

8. Be sure to consider the following writing and formatting tips.

- Use a spell checker!
- Number the pages.
- Be concise.
- Write in plain language.
- Focus on important issues.
- Don't make assumptions that a FONSI will be the outcome of an EA.
- Use no less than Times New Roman 11 point font (we want the public and the reviewers to be able to read it).
- Be consistent in naming facilities and places. Also use consistent abbreviations. Spell out names the first time.
- Include easy-to-read maps depicting everything relevant, like the old location, new location, surrounding land uses, zoning, etc.
- Include quality pictures that are clearly labeled.
- We prefer to staple the final document rather than have fancy bindings.
- **SUBMIT ON COMPUTER DISK ALONG WITH HARD COPY!** Text definitely, maps if possible.