

Coronavirus (COVID-19) Pandemic: Environmental and Historic Preservation and Emergency Protective Measures

Release Date: Apr 13, 2020

Environmental and Historic Preservation Compliance and Conditions

The Office of Environmental Planning and Historic Preservation (OEHP) is committed to facilitating timely and prompt compliance reviews for COVID-19 activities. This includes identifying activity types where the Applicant will need to provide additional information or documentation in order to conduct an environmental and historic preservation (EHP) compliance review.

Although certain emergency protective measures are statutorily exempted from review under the National Environmental Policy Act (NEPA), these actions may still require review for compliance with other EHP laws, regulations, and executive orders. For activities where there is potential to adversely impact natural and cultural resources, minority populations, and low-income populations, OEHP is working with our federal resource and regulatory agency partners to streamline EHP compliance through a programmatic approach.

Applicants are responsible for completing activities in a manner that complies with all state and local guidelines and for obtaining all necessary permits. Work determined in violation of local, State, or Federal laws, regulations, and executive orders may be ineligible for FEMA funding. Additionally, non-compliance with EHP project conditions associated with individual projects may jeopardize receipt of federal funding.

COVID-19 EHP Considerations

FEMA's Public Assistance Program will fund eligible emergency protective measures taken by a community to save lives, protect property and public health



FEMA

Page 1 of 5

and safety, and to lessen or avert the threat of a catastrophe. While the list of eligible activities includes actions that do not impact natural and cultural resources, minority populations, and low-income populations (EHP Considerations) (such as provision of personnel, supplies, and equipment), there are actions associated with these eligible activities that do have the potential to adversely impact EHP Considerations . Examples are:

- Repurposing, renovating, or reusing existing facilities as temporary medical or sheltering facilities
- Placement of prefabricated facilities on a site
- Construction of new temporary medical or sheltering facilities
- Storage of human remains and mass mortuary services
- Staging resources on an undeveloped site
- Proper disposal of biomedical waste, including contaminated items such as personal protective equipment
- Modification of an existing facility to provide “walk-up” access to services, physical barriers, or other small-scale instillation projects (i.e. fixed hand sanitizers, “sneeze guards”, queuing poles, etc. - free standing units or barriers are not in this category)
- Decontamination activities that may cause runoff or require installation of equipment

EHP Information Requirements

For projects that do have the potential to adversely impact natural and cultural resources, minority populations, and low-income populations, Applicants should be prepared to provide the following:

- Location of the work, including latitude/longitude in decimal degrees (to the fifth decimal point) and physical address. Maps or aerial imagery of the project area is also helpful.
- Description of any ground-disturbing activities including site preparation which may could be clearing/grubbing, instillation of new or expansion of existing utilities, or the expansion of existing footprints.
- Description of where and how all construction, modification, installation, will be done (i.e. equipment used, types of mounting brackets used, whether work is temporary or permanent, etc.).



FEMA

Page 2 of 5

- Date of original construction for facilities that are being reused, repurposed, or renovated.
- Description of work and photographs of interior and/or exterior modifications made to facilities over 45 years of age that are being reused, repurposed, or renovated.
- Description of the disinfection/decontamination activities that occurred (i.e. the use of disinfectant wipes, high-powered fogging misting or spraying equipment, use of EPA-registered disinfectant, hired commercial/industrial cleaning service, etc.)
- Location of debris disposal (including disposal method and location of any wastewater).

EHP Best Practices for Temporary Facilities

Responding to the COVID-19 pandemic may require reused, repurposed, or renovated existing facilities, the placement of prefabricated facilities on a site, or the construction of new temporary facilities. In order to minimize potential impacts or effects to natural and cultural resources, minority populations, and low-income populations, States, Tribes, communities, and Applicants should consider the following:

- Avoid placement of temporary facilities in flood hazard areas and wetlands. While FEMA recognizes that the construction of temporary facilities may be necessary, the disruption of relocating these facilities in the future due to flooding—especially when occupants may not be sufficiently mobile—is too great of a risk.
- Avoid placement of temporary facilities in brownfields and other use restricted sites. While FEMA recognizes that the construction of temporary medical facilities may be necessary, FEMA also recognizes the health risks of the occupants, medical providers, and construction workers and short- and long-term health risks associated with exposure to chemicals.
- Ensure accessibility across the full range of clients and/or customers that need to utilize the services being provided by these facilities, including elements of the population with less capacity or mobility.
- Select pre-disturbed sites or existing hardened surfaces, such as parking lots, concrete pads, or artificial playing fields, whenever possible. Previously disturbed areas typically have critical infrastructure such as electricity, water, sewer, and other amenities already onsite or easily accessible nearby, which



FEMA

Page 3 of 5

will minimize ground disturbance.

- Avoid new ground disturbance when possible. Should ground disturbance reveal archaeological resources, notify FEMA and State Historic Preservation Officer/Tribal Historic Preservation Officer immediately.
- If renovation of a facility is required, consider the impacts of reuse, repurpose, or renovation (e.g. exposure to asbestos, lead-based paint, or other environmental contaminants associated with past use of the property) on the health of occupants, medical providers, and construction workers.
- Document conditions by taking interior and/or exterior photographs before and after any work is carried out.

Best Practices for Disposal of Medical Waste

FEMA recognizes that the COVID-19 response may result in the need for the disposal of medical waste. FEMA advises States, Tribes, and communities, and Applicants to:

- Follow state and local laws for disposal of medical waste.
- If disposing of medical waste, indicate if an existing site will be used and if that site is permitted to take such waste or if the waste will be incinerated.

Best Practices for Decontamination Activities

FEMA recognizes that decontamination activities such as spraying down of facilities and the operation of decontamination stations may be necessary for public health and safety. FEMA advises States, Tribes, communities, and Applicants to:

- Provide a clear description of decontamination activities which may include UV lights/filters, hand washing/wiping hard surfaces with bleach or disinfectant, or the use of hoses or pumps to decontaminate large areas,
- Avoid/minimize run-off/disposal that enters stormwater systems or open waters.

Additional Resources

For more information, visit the Office of [Environmental Planning and Historic Preservation](#) on FEMA.gov.

For more information about FEMA's Public Assistance Program and the COVID-19 response, contact your [State Emergency Management Agency](#) or tribal office



FEMA

or visit [FEMA.gov/coronavirus](https://www.fema.gov/coronavirus).



FEMA