



FEMA

April 3, 2020

MEMORANDUM FOR: Regional Environmental Officers
Public Assistance Division Director
Consolidated Resource Center Directors

FROM: Kristin Fontenot
Director
Office of Environmental Planning and Historic Preservation

SUBJECT: Environmental and Historic Preservation (EHP) Compliance
Strategy for the Review of COVID-19 Public Assistance Projects

On March 13, 2020, a National Emergency Declaration was issued for the COVID-19 Pandemic that covers all States, Tribes, Territories, and the District of Columbia pursuant to section 501(b) of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. 5121-5207 (hereinafter, Stafford Act). In accordance with section 502 of the Stafford Act, eligible emergency protective measures taken to respond to the COVID-19 emergency at the direction or guidance of State, local, Tribal and Territorial public health officials may be reimbursed on a cost-sharing basis under Category B of FEMA's Public Assistance (PA) Program.

Additionally, numerous States and Territories have requested and received major disaster declarations pursuant to section 401(a) of the Stafford Act. We anticipate the number of these to increase in the coming months. In accordance with section 403 of the Stafford Act, federal funding is also available to state, tribal, and eligible local governments and certain private nonprofit organizations on a cost-sharing basis for emergency protective measures (Category B). It is anticipated that additional States, Territories, and Tribes will continue to request and receive major disaster declarations.

In response to the COVID-19 Pandemic, the Office of Environmental Planning and Historic Preservation (OEHP) has developed a nationwide strategy that ensures rapid, legally-defensible environmental and historic preservation (EHP) compliance; does not delay necessary work associated with COVID 19 response; and is consistently applied across all ten (10) Regions. This packet of information outlines that strategy and approach and is intended to be utilized nationwide by all participants in the EHP compliance process, including the Regional Environmental Officers (REOs) or their designees serving as Environmental and Historic Preservation Advisors (EHADs) for these many disaster declarations as well as the EHP personnel assigned to each Consolidated Resource Center (CRC).

The attached packet of information includes the following seven (7) documents:

COVID-19 EHP Process Flow – For use by both Region EHP and CRC EHP. A simple flow chart for COVID-19 projects.

COVID-19 EHP Compliance Strategy – For use by both Region EHP and CRC EHP. Overall strategy for review of COVID-19 projects.

COVID-19 EPM Activities Matrix – For use by both Region EHP and CRC EHP. For use by all; snapshot of activities and compliance determinations

COVID-19 Streamlined EPM EHP MFR – For use by CRC EHP when reviewing a project that meets the criteria for Streamlined EPM Review.

Standard Comments for COVID-19 EPM Activities – For use by Regional EHP when reviewing a project in EMIS.

GIS Instructions for COVID-19 Events – For use by Regional EHP to enter projects with new ground disturbance into the EHP GIS National Tool.

GeoPlatform Account Request Guidance Document – For use by Regional EHP if they need a GeoPlatform account.

The COVID-19 EHP Compliance Strategy for PA Projects is an overarching document that defines the EHP approach for all COVID-19 events.

Once the project is developed, **CRC EHP** will review the project for activity types.

Projects with *Activities that Have No Potential to Affect EHP Resources* will only be reviewed by **CRC EHP** in Grants Manager

Projects with *Activities that Have Potential to Affect EHP Resources* will go to **Region EHP** for review in EMIS

Streamlined EPM Review

CRC EHP will:

- Utilize COVID-19 EHP Compliance Strategy for PA Projects
- Complete the COVID-19 Streamlined EPM EHP Memo for Record (MFR)
- Complete the EHP Evaluation Criteria in Grants Manager

Standard EHP Review

Region EHP will:

- Utilize COVID-19 EHP Compliance Strategy for PA Projects
- Refer to the COVID-19 EPM Activities Matrix for snapshot of compliance determinations
- Utilize Standard Comments for COVID-19 EPM Activities for EMIS review
- Utilize GIS Instructions for COVID-19 Events to document new ground disturbance in EHP GIS National Tool
- Upload the Record of Environmental Consideration, add any project-specific conditions, and approve the project in Grants Manager

COVID-19 EHP Compliance Strategy for Public Assistance Projects

In accordance with the Kristin Fontenot’s memorandum dated April 3, 2020, this document outlines the strategy that the Office of Environmental Planning and Historic Preservation (OEHP) will use to ensure consistent review of all Public Assistance (PA) Program projects developed as part of the COVID-19 Emergency or Major Disaster Declarations across all ten (10) Regions and four(4) Consolidated Resource Centers (CRCs).

PA Program Approach to COVID-19 Program Delivery

FEMA’s approach to the delivery of the PA Program for COVID-19 events is to streamline the grant process through direct application and simplified process steps. The national emergency declaration (and subsequent major disaster declarations) authorized Public Assistance Category B reimbursement for emergency protective measures (EPM) for activities that protect public health and safety. These declarations do not include additional categories of assistance, such as infrastructure repair and replacement, which are needed after typical natural disasters. This enables FEMA to allow many applicants to apply directly to FEMA for assistance without many traditional application steps, including exploratory calls (ECs), recovery scoping meetings (RSMs), and most site inspections; and allows FEMA to reduce documentation requirements to the minimum needed to support Category B reimbursement.

The PA Program is developing new tools and technology to account for this approach. This includes a COVID-19 specific project template that is intended to assist the Applicant in providing all necessary information during project application and developing the mechanisms for Applicants to apply directly to FEMA without technical assistance from FEMA or Recipients. OEHP has worked closely with the PA Program to identify environmental and historic preservation (EHP) information requirements for specific EPM activities to facilitate EHP compliance review once the project is developed.

OEHP Approach to EHP Compliance of PA COVID-19 Projects

OEHP has reviewed the eligible emergency protective measures identified in the Coronavirus (COVID-19) Pandemic: Eligible Emergency Protective Measures fact sheet dated March 19, 2020. Based on this review, OEHP has determined if these activities have the potential to affect natural and cultural resources, minority populations, and low-income populations (EHP resources).

Projects that only include activities that OEHP has determined have no potential to affect EHP resources will require no additional EHP-specific information from the Applicant, and, will utilize the **Streamlined Emergency Protective Measures (EPM) Review** process described below and in the CRC EHP Review Responsibilities memorandum from Kristin Fontenot, OEHP Director, dated August 30, 2018 (hereafter referred to as the August 30, 2018 memo).¹

¹ The August 30, 2018 memo outlines eligible activities and which CRC EHP roles can identify projects that do not require formal EHP documentation (also known as “Cat B bypass”). This process is now known as Streamlined EPM Review. For non-COVID-19 declarations, the August 30, 2018 memo still applies.

Projects that include activities that OEHP has determined *do* have the potential to affect EHP resources will go to the corresponding Region for **Standard EHP Review** described below.

OEHP has provided a *COVID-19 EPM Activities Matrix* that provides a snapshot of the categories of eligible activities that have been identified to date by the PA Program and the associated compliance determinations for those actions for a subset of laws and executive orders that are most likely to apply to these actions. This document can help provide an understanding of the level of review that will be required for various activity types and identifies if those activities would be reviewed at the CRC or at the Region.

COVID-19 Activities that have No Potential to Affect EHP Resources

OEHP has determined that activities related to the provision of personnel and administration and the procurement and/or distribution of supplies, equipment, and commodities in support of the management, control and reduction of immediate threats to public health and safety and/or emergency medical care have no potential to affect EHP resources. Please refer to **Appendix A** for a general list of potential activities.

Projects that include activities that have no potential to affect or impact EHP resources will be documented in the *COVID-19 Streamlined EPM EHP Memo for Record (MFR)* that will be attached to the project in Grants Manager. These projects will be handled entirely by CRC EHP and will not be submitted to the Region for review.

COVID-19 Activities that Have Potential to Affect EHP Resources

OEHP has determined that the following activities have the potential to affect EHP Resources.

- Repurposing, renovating, or reusing existing facilities as temporary medical or sheltering facilities
- Placement of prefabricated facilities on a site for temporary medical or sheltering purposes
- Construction of new temporary medical or sheltering facilities
- Storage of human remains and mass mortuary services
- Staging resources on an undeveloped site
- Disposal of medical waste

As mentioned above, OEHP has worked with the PA Program to help identify information requirements for the above referenced activities. This information is included as part of the COVID-19 project template which will be completed by the Applicant.

Compliance reviews for all projects that include activities that have the potential to affect EHP resources will be submitted to the Region for review and documented in the Environmental Management Information System (EMIS).

CRC EHP Reviewers and Streamlined EPM Review

In accordance with the August 30, 2018 memo, only CRC EHP Senior Specialists (IC-12s) and CRC EHP Lane Managers (IC-13s) have the authority to determine if projects can utilize the Streamlined EPM Review process. Due to the large number of projects anticipated for the

COVID-19 events, the OEHP CRC EHP Coordinator will work closely with the CRC EHP Lane Managers to maintain situational awareness of the CRC EHP workload. As necessary, the OEHP CRC EHP Coordinator will work with the OEHP Leadership and the CRC Directors and Deputy Directors to determine if additional reviewers are needed, the qualifications needed for those reviewers, and a means to secure additional reviewers (e.g., Reservist deployment and/or utilization of Technical Assistance Contractor support).

CRC EHP Completeness Review

Once a project is developed at the CRC, the project will go through a CRC EHP completeness review. At that time the CRC EHP Senior Specialist will determine if the activities in the project meet the criteria identified in Appendix A. If so, the project will follow the Streamlined EPM Review process described below. If the CRC EHP Senior Specialist determines that the project activities do not meet the criteria in Appendix A, the CRC EHP Senior Specialist will determine if the project is complete and ready for Regional EHP review utilizing the Standard EHP Review process described below.

Streamlined EPM Review

For projects where all activities meet the criteria in Appendix A, the CRC EHP Senior Specialist will complete the Streamlined EPM Review process when the project enters the Quality Assurance process step in Grants Manager.²

In order to ensure consistency across all four CRCs and a proper administrative record, the CRC EHP Specialist will prepare, sign, and attach the COVID-19 Streamlined EPM EHP MFR to the documents tab in the EHP Profile. The CRC EHP Senior Specialist will also identify the appropriate COVID-19 EHP Evaluation Criteria under the project's EHP Profile. Finally, the CRC EHP Senior Specialist will enter the three standard EHP review comments and the following COVID-19 specific comment under the EHP Profile, comments tab:

This project is not a major federal action affecting the environment per Section 316 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. 5159 and FEMA Instruction 108-1-1 and is statutorily excluded from the National Environmental Policy Act (NEPA), 42 U.S.C. § 4321 et seq.. FEMA has determined that the project has no potential to affect historic properties and FEMA has no further Section 106 responsibilities with regards to them pursuant to 36 CFR § 800.3(a)(1). Additionally, in accordance with 44 CFR § Part 9.5(c)(1), this project is exempt from EO 11988 and EO 11990 reviews and FEMA has determined that, under the Endangered Species Act, 16 U.S.C. §1531 et seq., the project has No Effect on federally-listed species or designated critical habitat.

The project subsequently will not be queued from EMMIE to EMIS or to the EHP Review process step in Grants Manager for Regional review.

² This process is more fully described in the August 30, 2018 memo and the CRC EHP Grants Manager Actions reference guide dated 8/31/2018.

Standard EHP Review

If CRC EHP determines the COVID-19 project does not meet the criteria for the Streamlined EPM Review process, the project will be entered into EMMIE and will queue to EMIS and the EHP Review process step in Grants Manager for review by the Region.³ The Regional EHP Reviewer will refer to Grants Manager to obtain all project information and refer to the COVID-19 EPM Activities Matrix to assist them in making their compliance determinations.

The EHP review in EMIS will be completed utilizing the OEHP issued Standard Comments for COVID-19 EPM Activities that outline the appropriate radio button to select and comments and conditions to be entered depending on the activity type. Regional standard comments are NOT to be used except in those cases where it is identified that the reviewer should follow the guidance of their EHP leadership. EHP Reviewers will also need to follow the GIS Instructions for COVID-19 Events for entering projects involving new ground disturbance into the FEMA EHP National GIS Tool System for national tracking in accordance with the national emergency consultation agreements.

It is imperative that the OEHP issued standard comments and related project instructions be followed as this is how FEMA will ensure we meet our tracking and reporting obligations under nationwide consultations and ensuring maximum review consistency.

Following completion of the EHP review in EMIS, the REO, or their designee for the COVID-19 events, will add any project specific conditions to the project in Grants Manager, answer the EHP compliance question, upload the Record of Environmental Consideration (REC), and “approve” the project. The REC must be attached in Grants Manager by the EO during their review as Grants Manager is the system the Applicant and Recipient utilize to review and sign their projects.

Reporting of COVID-19 Projects

As identified in the August 30, 2018 memo, EHP staff at the CRCs will not individually track or report out on COVID-19 projects that met the criteria for the Streamlined EPM Review process.

Regional EHP Staff should continue to track projects that utilize the Standard EHP Review process per their specific Regional guidelines.

OEHP recognizes that metrics regarding the COVID-19 events may be useful for general analysis and after-action reporting. As time permits, the OEHP PA EHP Coordinator will work with the OEHP Data Analyst to develop reports utilizing data pulled from Grants Manager or EMIS. Any reports will be shared with OEHP Leadership, the OEHP Policy Branch, the REOs, PA Leadership, and the CRCs.

Quality Assurance/Quality Control (QA/QC) of CRC EHP Determinations

OEHP’s CRC EHP Coordinator will work with OEHP Leadership and the CRC EHP Lane Managers to identify a strategy to validate the Streamlined EPM Review process determinations

³ This process is more fully described in the Conducting EHP Reviews of Public Assistance Grants for Events that use Grants Manager memorandum from Kristin Fontenot, dated July 8, 2019.

made by the CRC EHP Senior Specialists. Any QA/QC processes set up will be described in updates to August 30, 2018 memo.

Grants Manager and COVID-19 Projects

OEHP understands that the PA Program will be implementing changes to Grants Manager/Grants Portal to develop and process COVID-19 projects. OEHP's PA EHP Coordinator will continue to monitor these developments and will work with the PA Program to ensure that Grants Manager EHP processes comply with this strategy.

Revisions to this Strategy

OEHP recognizes that the COVID-19 events are unlike any events FEMA has previously seen or supported. The OEHP PA EHP Coordinator, in coordination with the OEHP CRC EHP Coordinator, will monitor PA Program developments and recommend adjustments to this strategy, in coordination with OEHP Leadership, as necessary. Additionally, the national emergency consultations that FEMA has entered into with applicable resource agencies, include specific reporting requirements and timelines for reevaluation of the consultation processes. Therefore, national requirement could adapt over time during the length of the COVID-19 pandemic. Any changes to this strategy will be communicated to the REOs, PA Leadership, and the CRC Directors.

Appendix A

COVID-19 Activities that Have No Potential to Affect EHP Resources

OEHP has determined that the following activities are related to administration, personnel, and the procurement of supplies, commodities, and equipment and have no potential to affect EHP resources.

Any questions regarding if an activity type has the potential to affect EHP resources will be directed to the OEHP CRC EHP Coordinator who will coordinate with OEHP Leadership for discussion and follow-up. OEHP understands that the activities potentially eligible for funding may change as the COVID-19 process is more fully fleshed out. Any adjustments to this list will be distributed to CRC EHP.

Management, control and reduction of immediate threats to public health and safety

- Emergency Operations Center (EOC) costs
- Training specific to COVID-19
- Facility disinfection (*Completed work only.*)
- Technical assistance on emergency management
- Dissemination of information to the public to provide warnings and guidance
- Pre-positioning or movement of supplies, equipment, or other resources (*On existing developed sites only.*)
- Purchase and distribution of food, water, ice, or other commodities
- Security, law enforcement, barricading, and patrolling

Emergency Medical Care

- Purchase and distributions/use of medical supplies & equipment including:
 - In vitro diagnostic supplies
 - Personal Protective Equipment (PPE)
 - Decontamination system (*Purchase*)
 - Decontamination system (*Use, if completed work. If work to be completed, project requires project-specific conditions and must go to Region for review.*)
 - Ventilators and products modified for use as ventilators
 - Therapeutics
- Provision of medical services
 - Disease testing
 - Non-deferrable medical treatment (*This is care only - not the funding of a temporary medical facility.*)
 - Emergency medical transport

Sheltering

- Household pet or assistance animal or service animal sheltering or containment (*As long as it does not involve the construction or build out of a new facility.*)

4/3/2020	COVID-19 EPM Activities Matrix							Potentially eligible activities, OEHP planning for just in case.		
Type of Assistance	Category B - Emergency Protective Measures (403/502)									
General Type	Administrative, Personnel, Supplies, Commodities, and Equipment	Medical Waste	Temporary Medical Facilities - Repurpose/Reuse of Buildings	Placement of Pre-Fabricated Buildings on Sites	New Construction of Temporary Facilities	Medical Sheltering - Congregate and Non-Congregate (Existing Facilities)	Non-Congregate Sheltering (New Facilities - TTs)	Non-Congregate Sheltering (New Facilities - MHUs Individual Sites)	Non-Congregate Sheltering (New Facilities - MHUs Group Sites)	
Description <ul style="list-style-type: none"> Management, control, and reduction of immediate threats to public health and safety Emergency Operation Center costs Training specific to COVID-19 Facility disinfection (completed work only) Technical assistance to state, tribal, territorial or local governments on emergency management Dissemination of information to the public to provide warnings and guidance Pre-positioning or movement of supplies, equipment, or other resources (on existing developed sites only) Purchase of food, water, ice, or other commodities Security, law enforcement, barricading, and patrolling Emergency Medical Care Purchase and distribution/use of medical supplies & equipment, including -- In vitro diagnostic supplies, -- Personal Protective Equipment (PPE), -- Ventilators and products modified for use as ventilators, -- Therapeutics -- Decontamination system (purchase) Decontamination system (use, if completed work) Provision of medical services Disease testing, --Non-deferrable medical treatment of infected person in a shelter or temporary medical facility, -- Emergency medical transport Medical Sheltering Household pet sheltering and containment actions related to household pets 	<ul style="list-style-type: none"> Medical waste disposal (likely to include collection, storage, and disposal) 	<ul style="list-style-type: none"> Retrofit of an existing facility to serve as a temporary hospital or testing site 	<ul style="list-style-type: none"> Placement of pre-fabricated structures on sites to function as a hospital or testing site 	<ul style="list-style-type: none"> Construction of new, temporary facilities such as a hospital or testing site 	<ul style="list-style-type: none"> Congregate sheltering in community centers, conventions centers, arenas, etc. Non-congregate sheltering in hotel rooms etc. (non-congregate examples of target populations include those who test positive for COVID-19 who do not require hospitalization but need isolation; those who have been exposed to COVID-19 who do not require hospitalization; and asymptomatic high-risk individuals needing social distancing as a precautionary measure, such as people over 65 or with certain underlying health conditions (respiratory, compromised immunities, chronic disease). 	<ul style="list-style-type: none"> Placement of Travel Trailers (TTs) 	<ul style="list-style-type: none"> Placement of MHUs- Private and Commercial sites 	<ul style="list-style-type: none"> Placement of MHUs- Group sites 		
NEPA	STATEX	STATEX	STATEX	STATEX	STATEX	STATEX	STATEX	STATEX	STATEX	
Section 106 of NHPA	<p>FEMA has determined that activities have limited or no potential to affect historic properties and FEMA has no further Section 106 responsibilities with regards to them pursuant to Stipulation I.A.7(b) of the FEMA Prototype Programmatic Agreement and 36 CFR § 800.3(a)(1) provided that storage occurs within existing facilities or on previously disturbed soils. Otherwise, follow process for repurpose/reuse of temporary facilities or new construction/installation of prefabricated buildings for storage of medical waste. For disposal, expedited consultation with the SHPO/THPO required only if FEMA determines undertaking will adversely affect historic properties. SOI qualified staff documents determination and any treatment measures in EMIS and review responsibilities are complete. Notification can occur with SHPO/THPO project by project as a batch or at the end of the expedited period.</p>	<p>FEMA has determined that activities have limited or no potential to affect historic properties and FEMA has no further Section 106 responsibilities with regards to them pursuant to Stipulation I.A.7(b) of the FEMA Prototype Programmatic Agreement and 36 CFR § 800.3(a)(1).</p>	<p>Programmatic allowance for installation and removal of temporary structures for use as school classrooms, offices, or temporary shelters for essential public service agencies, such as police, fire, rescue and medical care. If no allowance applies or is available, expedited consultation with the SHPO/THPO required only if FEMA determines undertaking will adversely affect historic properties. SOI qualified staff documents determination and any treatment measures in EMIS and review responsibilities are complete. Notification can occur with SHPO/THPO project by project as a batch or at the end of the expedited period.</p>	<p>Programmatic allowance for installation and removal of temporary structures for use as school classrooms, offices, or temporary shelters for essential public service agencies, such as police, fire, rescue and medical care. If no allowance applies or is available, expedited consultation with the SHPO/THPO required only if FEMA determines undertaking will adversely affect historic properties. SOI qualified staff documents determination and any treatment measures in EMIS and review responsibilities are complete. Notification can occur with SHPO/THPO project by project as a batch or at the end of the expedited period.</p>	<p>Programmatic allowance for installation and removal of temporary structures for use as school classrooms, offices, or temporary shelters for essential public service agencies, such as police, fire, rescue and medical care. If no allowance applies or is available, expedited consultation with the SHPO/THPO required only if FEMA determines undertaking will adversely affect historic properties. SOI qualified staff documents determination and any treatment measures in EMIS and review responsibilities are complete. Notification can occur with SHPO/THPO project by project as a batch or at the end of the expedited period.</p>	<p>Programmatic allowance for temporary housing for disaster personnel and survivors at the following types of locations: Single units on private residential site when all utilities are installed above ground or tie into pre-existing utility lines. Existing RV/mobile home parks and campgrounds with pre-existing utility hookups; paved areas, such as parking lots and paved areas at such facilities as conference centers, shopping malls, airports, industrial port facilities, business parks, and military bases when all utilities are installed above ground or tie into pre-existing utility lines. Sites that have been previously prepared for planned construction, such as land being developed for public housing, office buildings, city parks, ball fields, schools, etc., when all utilities are installed above-ground or tie into pre-existing utility lines. Areas previously filled to depths of at least six feet so that subsurface utilities can be installed. If no allowance applies or is available, expedited SHPO/THPO consultation required only if FEMA determines undertaking will adversely affect historic properties. SOI qualified staff documents determination and any treatment measures in EMIS and review responsibilities are complete. Notification can occur with SHPO/THPO project by project as a batch or at the end of the expedited period.</p>	<p>Programmatic allowance for temporary housing for disaster personnel and survivors at the following types of locations: Single units on private residential site when all utilities are installed above ground or tie into pre-existing utility lines. Existing RV/mobile home parks and campgrounds with pre-existing utility hookups; paved areas, such as parking lots and paved areas at such facilities as conference centers, shopping malls, airports, industrial port facilities, business parks, and military bases when all utilities are installed above ground or tie into pre-existing utility lines. Sites that have been previously prepared for planned construction, such as land being developed for public housing, office buildings, city parks, ball fields, schools, etc., when all utilities are installed above-ground or tie into pre-existing utility lines. 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ESA	No Effect	No Effect if using existing facility authorized to take medical waste.	No effect	Activity addressed under national ESA emergency consultations between FEMA and FWS/NMFS. See "Standard Comments for COVID-19 EPM Activities" for guidance on reviewing project in EMIS.	Activity addressed under national ESA emergency consultations between FEMA and FWS/NMFS. See "Standard Comments for COVID-19 EPM Activities" for guidance on reviewing the project in EMIS and "GIS Instructions for COVID-19 Events" for instructions for entering projects that involve new ground disturbance into the GIS tool for tracking.	No Effect	Activity addressed under national ESA emergency consultations between FEMA and FWS/NMFS. See "Standard Comments for COVID-19 EPM Activities" for guidance on reviewing the project in EMIS and "GIS Instructions for COVID-19 Events" for instructions for entering projects that involve new ground disturbance into the GIS tool for tracking.	Activity addressed under national ESA emergency consultations between FEMA and FWS/NMFS. See "Standard Comments for COVID-19 EPM Activities" for guidance on reviewing the project in EMIS and "GIS Instructions for COVID-19 Events" for instructions for entering projects that involve new ground disturbance into the GIS tool for tracking.	Activity addressed under national ESA emergency consultations between FEMA and FWS/NMFS. See "Standard Comments for COVID-19 EPM Activities" for guidance on reviewing project in EMIS.	

