Chapter 5: Damage and Impact Information

The Public Assistance (PA) Program provides reimbursement to address damage, debris impacts, and emergency protective measures necessary as a direct result of the declared incident. This chapter provides information on determining what damage and impacts are eligible, identifying damage and impacts, finalizing the list of impacts, and logically grouping into project applications.[128] The "Public Assistance Program Delivery Guide"[129] provides an overview of these process steps.

I. Impact List

Applicants must submit a list that includes each facility damaged, each debris impacted site, and each overarching emergency protective measure taken to address immediate threats to the general public. Applicants must also identify whether they are claiming management costs or work and costs for building code, floodplain management administration, or enforcement activities. An applicant lists the information by location with a rough estimate of the associated cost. The list does not include detailed descriptions of impacts, damaged components within a facility, or a final estimate of costs. FEMA does not use this information to determine the monetary assistance available for the applicant.

Each activity and impacted site in the impact list must include the following:

- Facility name or unique identifier (e.g., campus name or site);
- Facility type (e.g., building, road, or system);
- Specific location (e.g., address or global positioning system (GPS) coordinates) of debris impacts or facility damage (required);
- General description of damage, emergency protective measures, or approximate type and quantities of debris;
- Approximate cost;
- Status of work;
- Date of original facility construction; and,
- Project priority level.

A. Impact List Submission Deadline

Applicants are required to identify and report all incident-related impacts and damage to FEMA within 60 days of attending a recovery scoping meeting.[130] FEMA may extend the deadline to identify and report the impacts if an applicant submits a request with justification based on extenuating circumstances beyond the

[128] 44 Code of Federal Regulations (C.F.R.) § 206.201(l).
[129] For more information, refer to: *Public Assistance Program Delivery Guide*.
[130] 44 C.F.R. § 206.202 (d)(1)(ii).

recipient's or applicant's control.[131] For example, FEMA extends the deadline for an inaccessible site or when an applicant is in an area where FEMA approved additional categories of work after the recovery scoping meeting.

B. Inundated and Submerged Roads

Inundated and submerged roads should not be assessed until flood waters have receded to ensure safety and allow time for saturated soil to dry out. Allowing adequate time for saturated soil to dry out is necessary to effectively determine if eligible surface damage has occurred. If the waters have not receded prior to the deadline, FEMA may approve a time extension for those sites if it is feasible to wait until flood waters recede to assess potential damage safely and effectively. Applicants must inform FEMA if there are roadways that experience inundation from closed basin flooding that may be submerged indefinitely due to water not being able to drain (see Closed Basin Flooding in Chapter 8 for additional information).

II. Grouping Impacts into Projects

This section defines logical grouping of work and damage.[132] FEMA and the recipient work with the applicant to identify impacts, facilities, and sites that can be combined into one project. This is a two-step process: 1) create groups based on categories of work and facility types and 2) identify sites or facilities that should be formulated into separate projects.

Facilities under the authority of other federal agencies or those that are ineligible for PA (e.g., facilities not in use at the time of the incident in accordance with Inactive or Partially Inactive Facility in Chapter 4) must not be formulated in a project. Applicants can either withdraw these sites and facilities from its impact list or FEMA will issue an ineligibility determination. Logical grouping should never be based on project size or grant administration considerations.

A. Initial Debris Removal Grouping (Category A)

The bullets below identify debris removal that FEMA initially groups together (each bullet stands for one initial grouping):

- All debris removal from public property;
- All debris removal from waterways;
- All debris removal from private non-commercial property;
- All debris removal from commercial property; and,
- All debris removal from private roads.

[131] 44 C.F.R. § 206.202 (f)(2).
[132] 44 C.F.R. § 206.201(k).

B. Initial Emergency Protective Measures Grouping (Category B)

The bullets below identify emergency protective measures that FEMA initially groups together. Each bullet stands for one initial grouping:

- All private property demolition;
- All emergency response activities (except those conducted on private property);
- Any emergency protective measures performed on private property;
- All emergency protective measures that involve facility construction or repairs; and,
- Each individual temporary facility.

C. Initial Permanent Work Grouping (Categories C-G)

The bullets below identify damaged facilities that FEMA initially groups together. Each bullet stands for one initial grouping. The list is based on infrastructure categories.

1. TRANSPORTATION

- All roads, bridges, low water crossings, and culverts;
- All mass transit facilities, such as subways and railways;
- All airports; and,
- All ports and harbors.

2. WATER CONTROL

- All dams and reservoirs;
- All canals, drainage channels, ditches, acequias and aqueducts;
- All stormwater retention and detention basins; and,
- All shoreline protection facilities (levees, berms, seawalls, sand revetments, etc.).

3. EDUCATION

- All school campuses.

4. HOUSING

- All public housing campuses.

5. HEALTH

- All hospital campuses and medical facilities.

6. EMERGENCY SERVICE FACILITIES

- All police, fire, emergency operations centers, etc.

7. OTHER GOVERNMENT FACILITIES

- All courthouses, prisons, administrative buildings, and other non-emergency buildings.

8. ENERGY

- All power generation facilities and plants, including all wind turbines, generators, substations, and other facilities within the confines of the plant;

- Entire power transmission and distribution system; and,
- Entire natural gas transmission and distribution system.

9. WATER/WASTEWATER

- All water and wastewater treatment plants;
- Entire water distribution system;
- Entire wastewater collection system; and,
- Entire irrigation system.

10. COMMUNICATIONS/INFORMATION TECHNOLOGY

- All communication systems.

11. NATURAL AND CULTURAL RESOURCES

- All parks, golf courses, and fish hatcheries;
- All beaches;
- All cemeteries, tribal burial grounds, and sacred sites; and,
- All libraries, museums, and art galleries.

FEMA includes administrative and support facilities at a site in the same project as the primary facility. Applicants must provide each damaged facility as a separate impact, whether ancillary or primary. FEMA groups administrative and support facilities with the primary facility using the site identifier and other information provided by the applicant in the impact list. Administrative and support facilities may include but are not limited to: buildings, outside structures (e.g., maintenance and storage sheds, restroom facilities, bath houses, pumping stations), communication towers and antennas, contents, supplies, equipment, vehicles, fences, parking lots, stairs, ramps, access roads, runways, signage, lighting, sidewalks, gutters, ditches, guard rails, integral ground, catch basins, outfall structures, piers, docks, trails, benches, picnic tables, swimming pools, golf courses, ball fields, etc. Note that for private nonprofits (PNPs), not all support facilities are eligible. See Facility Eligibility in Chapter 3 for additional information on evaluating PNP facility eligibility.

D. Final Grouping

After initially grouping sites and facilities into one project, FEMA identifies sites or facilities that need to be separated from the initial grouping and formulated into separate projects. Sites or facilities that need to be separated include those that:

- Are anticipated to require complex Environmental and Historic Preservation (EHP) reviews (see Chapter 10: Environmental and Historic Preservation for more information on EHP review and considerations);
- Are in a special flood hazard area (SFHA);
- Need funding for architectural/engineering design or studies to determine the method of restoration for the facility. In these cases, FEMA amends the project with the facility scope of work (SOW) and cost once the repair is determined so the facility is not captured on a separate project; and.
- Have 100 percent of all the work completed. Work items on the same facility may not be separated even if some of the work is complete and other work is not complete. Only a facility for which all work is complete should be separated from a facility that does not have all work complete;

- Are complex and require specialized technical support for project formulation, such as significantly damaged wastewater treatment plants, dams, hospitals, or schools;
- Potentially have ineligible work;
- Would make a project too burdensome to review due to the number of sites and facilities combined (consider separating into two projects or creating separate projects based on geographical locations); and/or,
- The applicant and FEMA agree there are specific circumstances that make it illogical to combine a site or facility with other sites or facilities.

PNP applicants should also separate critical service facilities into separate projects from noncritical service facilities so that projects with critical service facilities are not delayed pending the U.S. Small Business Administration (SBA) determination described under Small Business Administration Loan Requirement in Chapter 3.

E. Building Code and Floodplain Management Administration and Enforcement Activities Grouping (Category I)

All activities eligible under the Disaster Recovery Reform Act (DRRA) Section 1206, building code and floodplain management ordinance administration and enforcement should be grouped within a project.

F. Grant Management Activities Grouping (Category Z)

All activities eligible under the Disaster Recovery Reform Act (DRRA) Section 1215[133] and FEMA's Public Assistance Management Costs (Interim) policy,[134] should be grouped within a project.

[133] For more information, refer to: Section 1215 | Management Costs.
[134] For more information, refer to: Public Assistance Management Costs (Interim) (FEMA Recovery Policy FP 104-11-2).