

**National Park Service
2013 Hurricane Sandy Disaster Relief Grants
Program Approach Statement**

Background. Public Law 113-2 appropriated \$50 million from the Historic Preservation Fund (HPF) for historic preservation projects providing relief for damages in areas that have received a major disaster declaration pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 et seq.), resulting from Hurricane Sandy, which occurred in 2012. After the mandatory sequestration impacting Fiscal Year 2013 appropriations, the amount of available funds was reduced to \$47.5 million.

The Federal Emergency Management Agency (FEMA) issued major disaster declarations in 12 States and the District of Columbia after Hurricane Sandy. Within those States receiving major disaster declarations, FEMA further designated individual counties as eligible to receive Individual Assistance and/or Public Assistance. In counties that FEMA declared eligible to receive Individual Assistance, FEMA will provide direct assistance to individuals and households. In counties that FEMA declared eligible to receive Public Assistance, FEMA will provide direct assistance to State and local governments for emergency work and the repair or replacement of disaster-damaged facilities. Among the 12 States and DC that received major disaster declarations, there were only four States in which FEMA made both Individual Assistance and Public Assistance available. These States are Connecticut, New Jersey, New York, and Rhode Island. The remaining eight States and the District of Columbia are eligible for only Public Assistance. The National Park Service (NPS) interprets this as indication from FEMA that the four States eligible for both Individual and Public Assistance received the most widespread and significant damage from Hurricane Sandy.

Using the FEMA major disaster declarations as a starting point for determining the method of apportioning the \$47.5 million, the NPS will divide the appropriation into two groups. Group 1 includes \$38 million and will be apportioned to the four States containing counties that FEMA designated as eligible to receive both Individual and Public Assistance – Connecticut, New Jersey, New York, and Rhode Island. The remaining funds will comprise Group 2, and will be awarded to the remaining eight States, the District of Columbia, and any Tribal Historic Preservation Offices located in the disaster area, through an application process and based on need as described in proposals submitted by the States and Tribes to the NPS. The NPS will use \$474,000 to administer the program during Fiscal Years 2013-2015.

In apportioning the \$38 million from Group 1 that will be assigned to CT, NJ, NY, and RI, because State Historic Preservation Offices (SHPO) in those States have not yet completed damage assessments to historic properties, there is no single best method of determining need. Funds will be distributed using a formula that takes into account three evaluation factors, each having equal weight: 1) population of counties eligible for both Individual Assistance and Public Assistance, 2) land area of counties eligible for both Individual Assistance and Public Assistance, and 3) the number of properties listed in the National Register of Historic Places in counties eligible for both Individual Assistance and Public Assistance.

Goals. These 2013 supplemental funds are intended to preserve and/or rehabilitate historic and archeological resources impacted by Hurricane Sandy. In order to provide this badly needed assistance, grantees should strive for prompt obligation and rapid expenditure of the funds. Accordingly, grantees may be required to augment their staffs in order to expedite the award of subgrants and contracts.

Eligible activities that may be charged to this grant include: 1) hiring additional term, temporary, or contractor staff to enable the States and Tribes to expeditiously conduct the reviews of all Federally funded or sponsored projects required by Section 106 of the National Historic Preservation Act, 2) preservation technical assistance to local government officials and to all owners of properties listed in or considered eligible by the State Historic Preservation Officer for listing in the National Register of Historic Places; and 3) architectural/engineering plans and specifications, economic feasibility studies, survey and damage assessments, construction work to stabilize and repair historic and archeological properties, and survey of hurricane-damaged properties.

Technical assistance includes such activities as workshops, building inspections, publications, videotapes, or television/radio productions providing technical information about stabilizing hurricane-damaged historic structures or about cleaning and preserving historic properties and sites. Allowable predevelopment and development activities are detailed in Chapter 6, Sections J, K, and M of *The Historic Preservation Fund Grants Manual*. To the extent possible, the NPS will rely on existing systems to deliver these funds. (See the Questions and Answers section contained in the following pages for further guidance on the grant application, selection, tracking and reporting processes. Any additional questions should be directed to Jenifer Eggleston, Grants Management Specialist, Historic Preservation Grants Division at 202-354-2071, or e-mail to jenifer_eggleston@nps.gov.)

Grantees must consider FEMA guidance when rebuilding or restoring properties located within FEMA designated flood zones. Rather than inserting requirements into the grant agreements that would restrict States and Tribes from funding projects within flood zone areas, the NPS will develop programmatic agreements with the SHPOs, THPOs, and the Advisory Council on Historic Preservation (ACHP) that will delegate the review of individual grant projects to the SHPOs and THPOs. This will allow the SHPOs and THPOs to interpret *The Secretary of the Interior's Standards for the Treatment of Historic Properties* (Standards) as they deem appropriate to projects in their jurisdictions, and to integrate their projects into FEMA's hazard mitigation planning. The programmatic agreements will recognize that there are multiple players involved in the recovery effort and that there must be coordination between various State, Tribal, and Federal agencies that may be providing assistance to the State and Tribe for their disaster recovery. Prior to awarding grants the SHPOs and THPOs will submit action plan narratives that will address how they anticipate coordinating and working with all of the regulations that will impact these projects. This is a similar process to what was developed for the Hurricane Katrina recovery grant program. In the few cases where property owners disputed the SHPOs review and interpretation of the Standards, the SHPO would bring the project to the NPS for review. In the administration of the Katrina grants, the NPS established a programmatic agreement with the Gulf Coast SHPOs. This programmatic agreement will serve as the basis for the agreement being developed for the Sandy recovery grants. Through the programmatic agreement, the NPS worked with the Gulf Coast

SHPOs to help them assist HPF grantees both to successfully meet the Standards and to receive FEMA mitigation funding. The Mississippi SHPO developed elevation guidance in conjunction with the Mississippi Development Authority. This guidance may be referenced in the development of protocols in the Sandy programmatic agreements.

It is important to remember that FEMA does not generally direct property owners not to rebuild or to abandon their properties within flood zones. FEMA makes recommendations. The flood plain maps delineate zones within flood plains with degradations of risk. While FEMA may make recommendations for recovery activities within flood zones, they make allowances to their requirements for historic properties.

Grant Instructions

- I. Program Purpose. The purpose of this supplemental funding is to provide technical assistance and emergency repairs to historic and archeological resources impacted by Hurricane Sandy. Only hurricane-related damage is eligible for grant assistance. The NPS will rely on the assessment and documentation of the SHPO and THPO offices to determine eligibility of storm damaged resources and eligible grant expenditures related to the storm damage.

- II. Applying for Funds – CT, NJ, NY, and RI. To obligate these funds, States will submit a grant application to the NPS, which includes the Application for Federal Assistance (SF 424), the Non-Construction Budget Form (SF 424A), the Construction Budget Form (SF 424C), the Non-Construction Assurances (SF 424B), and the Construction Assurances (SF 424D). The States must also submit an Action Plan Narrative providing an overview of needs in the State (instructions on Page 7). The following amounts will be apportioned:
 - Connecticut – \$8,014,769
 - New Jersey – \$13,144,042
 - New York – \$13,634,696
 - Rhode Island – \$3,206,493
 - **TOTAL - \$38,000,000**

Funds will be obligated on a programmatic basis. States will apply to receive the amount allocated; they will not apply for funds on a project-by-project basis. States must comply with Executive Order 12372 unless that State's Governor has opted to not participate in that clearinghouse process.

- III. Matching Funds. No nonfederal matching share will be required for these emergency funds, however NPS requires that each SHPO and THPO track what the total project budgets are for each of the grant funded activities

- IV. Project Selection. SHPOs and THPOs must use an Open Project Selection Process (specified in Chapter 8, Section C of *The Historic Preservation Fund Grants Manual*), to select subgrant projects. However, while SHPOs and THPOs must publish the selection criteria they are using to select subgrantees, they do not have to obtain public comment

about these criteria, given the emergency nature of this funding. SHPOs and THPOs must actually employ the announced criteria in selecting subgrants. The due date for subgrant applications is up to the SHPOs and THPOs; short deadlines for submitting subgrant applications are permissible given the emergency needs to be addressed by these funds. The announcement of availability of funds for subgrants must be published in a newspaper of statewide distribution at least once.

Even though emergency assistance is involved, SHPOs and THPOs must still consider the applicant's ability to successfully complete the proposed project, and whether the funds awarded will achieve a significant preservation objective. Applying additional selection criteria is up to the SHPO and THPO.

Only activity directly related to damage from Hurricane Sandy is eligible to receive grant funding. In addition development funding can only be made available to National Register listed or properties eligible for listing.

The following criteria should be used by SHPOs and THPOs when selecting recipients for Disaster Relief grant Assistance (note SHPOs and THPOs can and should create additional selection criteria as needed):

- a) Historic significance,
- b) Ability to complete the project promptly and successfully,
- c) Ability of the project to correct the storm related damage,
- d) Degree and nature of the damage (but see Section VI, Ineligible Activities),
- e) Completeness and accuracy of the grant application.

V. Eligible Activities. Funds shall be used for eligible predevelopment or development work and eligible review and compliance or National Register nomination work as defined in Chapter 6, Sections J, I, K, M and O of *The Historic Preservation Fund Grant Manual*. All of the activities defined in those sections apply unless specifically stated to the contrary in this Program Approach Statement or in the NPS-approved grant agreement. Funds may also be used for workshops or individual technical assistance and advice to local government officials and property owners about preserving historic and archeological resources affected by the hurricane, or for the recordation of damaged structures in accordance with Chapter 6, Section D of *The Historic Preservation Fund Grants Manual*. Only 2012 hurricane-related damage is eligible for assistance. SHPOs and THPOs should also review the issues discussed in the Questions and Answers section below.

VI. Ineligible Activities.

- a) Acquisition of real property is not an eligible cost for assistance from this emergency funding.
- b) Reconstruction is limited to portions of a historic property that still retain (prior to reconstruction) sufficient significance and integrity to remain listed in or eligible for listing in the National Register of Historic Places. Total reconstructions are not eligible for grant assistance. If specific features or elements of a building or

landscape are missing and thus need to be recreated, this work is potentially eligible for funding (provided adequate historical documentation is available). Major reconstruction projects, such as recreating a building or landscape that has been completely destroyed, are not eligible for grant assistance because vanished structures, by definition, have lost their integrity and therefore are no longer eligible for the National Register of Historic Places, and thus for grant assistance.

- VII. Types of Properties. Construction repair work is normally undertaken only on properties listed in the National Register of Historic Places. This includes individually listed properties and those contributing to the significance of a National Register historic district. However, for this disaster relief grant, SHPOs and THPOs may fund construction work on resources that they consider are eligible for the National Register. In such cases, the SHPO or THPO must have at a minimum the documentation stipulated in Chapter 6, Section C.6 of *The Historic Preservation Fund Grant Manual*. NPS strongly recommends that the a National Register nomination be initiated after providing financial assistance from this grant for such properties.

Federal Properties. Federally owned properties are not eligible for assistance from this grant (see Chapter 13, Part D.14 of *The Historic Preservation Fund Grant Manual*).

Religious and Religious Owned Properties. The 1992 Amendments to the National Historic Preservation Act (P.L. 102-575) authorize predevelopment grants to religious properties. Due to the Justice Department's policy concerning the Constitutional issue of separation of Church and State, construction repair costs, or real property acquisition costs are not allowable costs. Accordingly, no development work on religious or religious owned properties may be funded with this grant assistance (non-construction work is eligible, see Chapter 6, Section E.3).

- VIII. Use or Lose
Funds not obligated within one year from the start date of the grant agreement are subject to recapture and reallocation to other grantees. NPS will use the Disaster Recovery Interim Progress Report described in Section XII, below, to assess the SHPO or THPO's use and expenditure of funds. NPS may recapture and reallocate funds to other grantees if a SHPO or THPO is not making prompt and effective use of its grant.
- IX. Preagreement Costs
Documented preagreement costs beginning October 29, 2012, will be authorized by the NPS Grant Agreement. (Please see Question 15, below, discussing competitive procurement requirements which are still required for all preagreement costs.)
- X. Administrative Costs.
Administrative costs as defined in Chapter 7, Exhibit B, page 7-B-5, of *The Historic Preservation Fund Grant Manual* are allowable costs of this grant as long as they are directly related to administering this grant, or to performing grant-assisted activities and do not exceed 5% of the total grant award .

XI. Standard Reporting Requirements.

Project Notifications and Final Project Reports will be required to be submitted to the NPS for projects exceeding \$25,000 in Federal share. Because these are not HPF or matching share funded activities, SHPOs and THPOs are not required to include the Outlay and Products of the Disaster Relief funds in the Cumulative Products Tables, Success Stories, or the Project Activity Database of the annual End-of-Year Report required for HPF grants. All other standard reporting requirements prescribed in *The Historic Preservation Fund Grant Manual* apply to these disaster relief activities. State and Tribal files are subject to examination by NPS staff during onsite visits to monitor this grant.

XII. Additional Reporting Requirements.

In addition to the requirements discussed above, SHPOs and THPOs must submit quarterly Interim Progress Reports on the Disaster Relief grant to enable the NPS to report to Congress on the program. The NPS will use these Interim Progress Reports to assess the use and expenditure of funds. The NPS may recapture and reallocate funds to other grantees if a SHPO or THPO is not making prompt and effective use of its grant award. Also, within 90 calendar days of the end date stipulated in the NPS grant agreement, SHPOs and THPOs must submit a Final Report on their activities.

Instructions for Preparing Action Plan Narrative

State or Tribe: _____

Action Plan Narrative for the Preservation, Stabilization, Rehabilitation, and Repair of Historic Properties Public Law 113-2

Document Date: _____

GUIDELINES

Governing Principles: Public Law 113-2 appropriated \$50 million from the Historic Preservation Fund to preserve and/or rehabilitate the historic and archeological resources damaged by Hurricane Sandy in areas that received major disaster declarations under the Stafford Act.

The Action Plan Narrative should outline, in not more than 10-15 pages, the major tasks to be undertaken with this supplemental HPF grant assistance. The Narrative should contain four broad sections: 1) A program overview statement providing a summary of the damage sustained in the State or Tribe; 2) Individual impact statements that briefly describe damage to major historic resources; 3) A summary of the SHPO's or THPO's plan to use these funds to efficiently implement a disaster recovery program; and 4) A statement of the SHPO's or THPO's ability to implement Section 106 and other compliance regulations, while coordinating with other Federal, State, Tribal, and Local recovery agencies and regulations.

Below are detailed instructions for each of the four Action Plan Narrative Sections.

Summary of Damage:

- Provide a narrative discussing the damage caused by Hurricane Sandy to historic resources and communities (note this in an overview of the damage not a full documentation of the damage to historic resources).

Review of Known Impacts:

- Provide an abbreviated list of damage to historic resources identified to date and/or provide narrative on how you will identify and provide outreach to these resources.
- Summary of impacts of Hurricane Sandy to your existing SHPO or THPO programs and projects.

Summary of Program Implementation:

- Proposed program timeline (this should include information on the anticipated time to establish a grant office if the SHPO or THPO deems it necessary).
- Staffing recommendations/plans for operating a grant program
- Description of the subgrant application and outreach process
- Description of the subgrant implementation process (including project reviews, financial controls, predicted program difficulties, and proposed project monitoring).

- Description of additional areas of focus and outreach to geographic areas or communities (i.e., development, workshops, seminars, survey projects, etc.).

Coordination with Federal, State, Tribal, and Local Agencies Providing Relief, to Ensure Successful Compliance with Federal Recovery Recommendations and Regulations:

- Provide information on how the SHPO or THPO anticipates completing Section 106 reviews associated with this grant funding as well as responding to the increase in Section 106 reviews associated with a large influx of Federal funding related to disaster recovery.
- Discuss how your office will work to coordinate compliance with a wide variety of Federal, State, Tribal, and Local agencies' rules, regulation, and requirements regarding post-disaster recovery, specifically with FEMA guidance regarding rebuilding within designated floodplains.

Questions and Answers for the Hurricane Disaster Relief Program

- 1) Must 10% of the Disaster funds to States be passed through to Certified Local Governments?

No, the 10% CLG Pass-Through requirement is not applicable to this special supplemental appropriation. However, CLGs are eligible subgrant applicants and States are encouraged to award subgrants to CLGs, National Heritage Areas, and Main Street Districts if they have projects that meet Disaster Relief grant selection criteria.

- 2) Can nonfederal publicly owned buildings used for government purposes be funded from this Disaster Relief grant?

Yes, as long as the normal requirements of *The Historic Preservation Fund Grant Manual* are met.

- 3) Can subgrantees carry out projects without the appropriate qualified staff, e.g., a preservation architect?

Not normally, the subgrantee must either use a qualified professional (see 36 CFR 61) to conduct the work, or the SHPO or THPO must accept responsibility for direct oversight of that project (see Chapter 6, Section C, and Chapter 8, Section D of *The Historic Preservation Fund Grant Manual*).

- 4) Can grantees hire additional staff to administer this Disaster Relief program?

Yes, grantees may use a portion of their funding to hire temporary employees or consultants to administer and monitor Disaster Relief projects.

- 5) Are Plans and Specifications for hurricane-damaged structures allowable costs?

Yes, all allowable predevelopment activities as defined in Chapter 6 are eligible. However, costs may not be charged to this grant if incurred prior to October 29, 2012.

- 6) Can SHPO or THPO employees prepare Plans and Specifications or conduct development work?

Yes, not every project must be a subgrant. However, the work must still meet Disaster Relief criteria described in this Statement of Program Approach and in the NPS-approved grant agreement.

- 7) Can indirect costs be paid for with Disaster Relief funds?

Yes, at the grantee's discretion, indirect costs (for either the State or a subgrantee) may be paid from this grant as long as they are supported by, and applied in accordance with, a

current Federally approved indirect cost rate. (Note that some indirect cost rates are set up to apply to personnel costs, but not to subgranted funds.)

- 8) Do all Disaster Relief development projects have to be conducted on National Register listed properties?

All properties receiving grant assistance for development work must normally be listed in the National Register of Historic Places. This includes individually listed properties and those contributing to the significance of a National Register historic district. However, for this disaster relief grant, SHPOs and THPOs may fund construction work on resources that they consider are eligible for the National Register. In such cases, the SHPO or THPO must have at a minimum the documentation stipulated in Chapter 6, Section C.6 of *The Historic Preservation Fund Grant Manual*. NPS strongly recommends that the SHPO or THPO initiate a National Register nomination after providing financial assistance from this grant for such properties. The cost of researching and writing the nomination could be charged to this grant as part of preserving the grant-assisted property.

- 9) Do grantees need to execute covenants/easements or preservation agreements?

The NPS will require a covenant/easement recorded on the property deed of all grant projects no preservation agreements are allowable with this funding. The minimum term lengths for those covenants are based on grant amounts and are as follows:

- Up to \$50,000 a five year covenant/easement
- \$50,001 up to \$99,999 a ten year covenant/easement
- \$100,000 and above a twenty year covenant/easement

- 10) Does the Americans with Disabilities Act (ADA) apply to Disaster Relief projects?

Yes, alterations to historic buildings must comply with the provisions of the ADA. In certain cases, projects may not require compliance with the ADA depending upon the nature of the work involved. For example, roofing, painting, or wallpapering, or changes to mechanical and electrical systems that do not affect the usability of the building or facility are generally exempted from compliance with the ADA. Grantees may request a waiver from the provisions of the ADA in certain circumstances (see 36 CFR 1191); however this may hamper their ability to rapidly expend funds given the extra time required to seek approval of an exemption to ADA requirements.

- 11) What kind of conditions will the NPS put into the grant agreements to require the SHPOs and THPOs to take into account any requirements created by FEMA flood zone maps?

Rather than putting requirements into the grant agreements that would restrict States and Tribes from funding projects within the new flood zone maps, the NPS will develop programmatic agreements with the SHPOs, THPOs, and the ACHP that will delegate the review of individual grant projects to the SHPOs and THPOs. This will allow the SHPOs and THPOs to interpret the Standards as they deem appropriate to projects in their jurisdictions, and to integrate their projects into FEMA's hazard mitigation planning. The

programmatic agreements will recognize that there are multiple players involved in the recovery and that there must be coordination between various State, Tribal, and Federal agencies that may be providing assistance to the State or Tribe for their disaster recovery. Prior to awarding the grants the SHPOs and THPOs will submit action plan narratives that will address how they anticipate coordinating and working with all of the regulations that will impact these projects. This is a similar process to what was developed for the Hurricane Katrina recovery grant program. In the few cases where property owners disputed the SHPOs review and interpretation of the Standards, the SHPO would bring the project to the NPS for review. In the administration of the Katrina grants, the NPS established a programmatic agreement with the Gulf Coast SHPOs that will serve as the basis for the programmatic agreement being developed for the Sandy grants. Through the programmatic, the NPS worked with the Gulf Coast SHPOs to help them assist HPF grantees both to successfully meet the Standards and to receive FEMA mitigation funding. The Mississippi SHPO developed elevation guidance in conjunction with the Mississippi Development Authority. This guidance may be referenced in the development of protocols in the Sandy programmatic agreements.

It is important to remember that FEMA does not generally direct property owners not to rebuild or to abandon their properties within flood zones – they make recommendations. The flood plain maps delineate zones within flood plains with degradations of risk. While FEMA makes recommendations for recovery activities within flood zones, they make allowances to their requirements for historic properties.

- 12) Will the NPS review the Plans and Specifications for Disaster Relief projects?

No, except for properties that are National Historic Landmarks (NHLs). SHPOs and THPOs must certify that they have reviewed plans and specifications or other required predevelopment research to ensure that the proposed work meets the Standards. Plans and specifications must be retained in the SHPO's or THPO's files to document that they were reviewed and approved by qualified staff for compliance with the applicable Standards.

- 13) Can Disaster Relief subgrantees apply for certification for Preservation Tax Incentives under the Tax Act for the same work

No, not for the same work funded by this Federal grant. Property owners and lessees must confirm in writing to the SHPO that they have not received and will not seek certification from the Secretary of the Interior for Federal Historic Preservation tax credits for the work items assisted by the grant. (Note that grant-assisted work to repair the foundation could be funded by the Disaster Relief grant, while work to repair the windows was claimed for Federal Historic Preservation tax credits, but the exact same cost can not be claimed for both grant assistance and Tax Incentives.)

- 14) Are Project Signs required for each development project?

Yes, project signs must be displayed in a prominent location at each project site while project work is in progress. The sign must identify the project and NPS grant support.

This provision may be waived by prior written approval if NPS determines that, in accordance with Section 304 of the Act, this requirement would create a risk of harm to the site. See Chapter 5, Section K.2.b.3) of *The Historic Preservation Fund Grant Manual*.

- 15) Must there be a connection between Disaster Relief projects and the Comprehensive Statewide Historic Preservation Plan?

No.

- 16) Do Federal procurement requirements have to be met for work funded by this grant? Must contract bid documents or Requests for Proposals include the fact that Federal grant funds are involved in assisting the project?

Yes, SHPOs and THPOs may follow their own procurement procedures as long as the minimum Federal requirements in 43 CFR 12.76 are met. However, if a State's Governor or Tribal Chair has suspended competitive bidding requirements because of the hurricane emergency, then NPS will concur. In addition, public health and safety emergency situations with particular buildings may justify noncompetitive procurement awards if the State's or Tribe's Contracting Officer is willing to write up such a finding for the SHPO's or THPO's files. Prospective bidders need to be aware that Federal funds are involved and that consequently Federal, State, and Tribal requirements must be met.

- 17) Does the Davis-Bacon Act apply to Disaster Relief projects?

No, unless other Federal funds are involved. See Chapter 17, Section K.5 of *The Historic Preservation Fund Grant Manual*.

- 18) Is a SHPO or THPO allowed to advance funding into a selected grant project?

The ability to advance funding into a project might be prohibited by state laws and procedures so it is critical to understand your state process before advancing any grant funding. NPS strongly recommends that minimal, if any, grant funding be advanced to a project. However if advancing funds becomes critical to the successful progression of a project the SHPO or THPO must carefully review Chapter 21, Section I of the grants manual to confirm compliance with all necessary documentation and procedures related to advancing funds.

- 19) Is a grant project allowed to be segmented for purposes of design review and grant compliance? For instance, can a SHPO or THPO fund a grant to repair the windows of a home and thus only review the design of those windows for compliance with the Standards, compliance with Section 106, and limit covenant or easement protection to those windows?

No, a grant funded property can not be segmented in any way for compliance with the Standards, compliance with Section 106, or the execution of a covenant/easement. The property must be reviewed in its entirety with a logical and defensible boundry (i.e., a row

house might have a different legal and logical boundry than a public building with significant landscape features).

20) What are **Eligible Projects** for Disaster Relief grant assistance?

- a. Development. Allowable development activities are detailed in Chapter 6, Section K of *The Historic Preservation Fund Grant Manual*.
- b. Archeological Stabilization. Archeological sites are eligible as long as the project meets the definition of eligible archeological development construction projects in Chapter 6, Section K.3 of *The Historic Preservation Fund Grant Manual*.
- c. Landscaping. The restoration, rehabilitation, stabilization, preservation, or protection of a documented historic landscape is eligible for grant assistance as detailed in Chapter 6, Section J.3.b and Section K.3.c.(1) of *The Historic Preservation Fund Grant Manual*.
- d. Predevelopment. Predevelopment costs such as Plans and Specifications, Engineering Reports, Historic Structures Reports, and Landscape Studies are allowable in accordance with Section K of *The Historic Preservation Fund Grant Manual*.
- e. Survey. Survey and documentation of damaged historic resources, or survey to assess the level of damage to historic properties.
- f. HABS/HAER Recordation. Recordation is allowable in accordance with Chapter 6, Section D.4 of *The Historic Preservation Fund Grant Manual*.
- g. Technical Assistance. Technical Assistance to property owners advising them about the appropriateness of predevelopment damage assessments or architectural/engineering plans and specifications, proposed construction work to stabilize and repair historic and archeological properties affected by hurricane damage is allowable. Technical assistance may include workshops, economic feasibility studies, publications, videotapes, or radio/television productions providing technical information about stabilizing hurricane-damaged structures, or about cleaning and preserving historic properties and sites.

21) What are **Ineligible Projects** for Disaster Relief grant assistance?

- a. Acquisition. Acquisition of real property is not an eligible cost for assistance from this emergency funding.
- b. Major Reconstruction. Reconstruction is limited to portions of a historic property that still retain (prior to reconstruction) sufficient significance and integrity to remain listed in the National Register. Total reconstructions are not eligible for grant assistance. If specific features or elements of a building or landscape are

missing and thus need to be recreated, this work is potentially eligible for funding (provided adequate historical documentation is available). Major reconstruction projects, such as reconstructing a building or landscape that has been completely destroyed, are not eligible for grant assistance. Vanished structures, by definition, have lost their integrity and therefore are no longer eligible for the National Register of Historic Places, or for grant assistance.