



FEMA

# GRANT PROGRAM COMPARISON

## Mitigation Directorate Grant Programs

During FY09, FEMA will offer five Hazard Mitigation Assistance (HMA) programs – the Hazard Mitigation Grant Program, the Pre-Disaster Mitigation program, the Flood Mitigation Assistance program, the Repetitive Flood Claims program and the Severe Repetitive Loss program. Although all five programs have unique statutory authorities, program requirements, and triggers for funding, all of the programs also have the common goal of providing funds to States and local communities to reduce the loss of life and property from natural hazard events.

This chart will help illustrate the similarities and differences among the grant programs.

**NOTE:** For the purposes of HMGP, Applicants will be referred to as subapplicants and applications will be referred to as subapplications.

Program Element	Hazard Mitigation Grant Program (HMGP)	Pre-Disaster Mitigation (PDM)	Flood Mitigation Assistance (FMA)	Repetitive Flood Claims (RFC)	Severe Repetitive Loss (SRL)
<b>Authorities</b>	Section 404 of the Robert T. Stafford Disaster Assistance and Emergency Relief Act (Stafford Act), 42 U.S. Code (U.S.C.) 5170c.	Section 203 of the Stafford Act, 42 U.S.C. 5133.	Section 1366 of the National Flood Insurance Act of 1968 (NFIA); 42 U.S.C. 4101c, as amended by the National Flood Insurance Reform Act of 1994 (NFIRA), Public Law 103-325; and the Flood Insurance Reform Act of 2004 (FIRA), Public Law 108-264.	Section 1323 of the NFIA, 42 U.S.C. 4030, as amended by the FIRA 2004, Public Law 108-264.	Section 1361A of the NFIA, 42 U.S.C. 4102a, as amended by the FIRA 2004, Public Law 108-264.
<b>Purpose</b>	To significantly reduce or permanently eliminate future risk to lives and property from natural hazards. HMGP funds projects in accordance with priorities identified in State, Tribal, or local hazard mitigation plans, and enables mitigation measures to be implemented during the recovery from a disaster.	To provide funds for hazard mitigation planning and the implementation of mitigation projects prior to a disaster event. Funding these plans and projects reduces overall risks to the population and structures, while also reducing reliance on funding from actual disaster declarations.	To reduce or eliminate the long-term risk of flood damage to buildings, manufactured homes, and other structures insured under the National Flood Insurance Program (NFIP).	To reduce or eliminate the long-term risk of flood damage to structures insured under the NFIP that have had one or more claim payments for flood damages.	To reduce or eliminate the long-term risk of flood damage to severe repetitive loss residential structures insured under the NFIP.

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<b>Program Priorities</b>	Priorities are set by the State under each disaster declaration that includes authorized HMGP assistance.	Provide funds for hazard mitigation planning and the implementation of mitigation projects prior to a disaster event.	Mitigation activities that reduce or eliminate the long-term risk of flood damage to insured properties.	Funding mitigation activities that are in the best interest of the National Flood Insurance Fund (NFIF).	Funding mitigation activities that are in the best interest of the NFIF.
<b>Applicant Eligibility</b>	State emergency management agencies or a similar State office (i.e., the office that has primary emergency management or as designated by the Governor), the District of Columbia, the U.S. Virgin Islands, American Samoa, the Commonwealth of Puerto Rico, the Commonwealth of the Northern Mariana Islands, and federally recognized Indian Tribal governments. Each State, Territory, or Tribal government shall designate one agency to serve as the Grantee for the program.	State emergency management agencies or a similar State office (i.e., the office that has primary emergency management or floodplain management responsibility), the District of Columbia, the U.S. Virgin Islands, American Samoa, the Commonwealth of Puerto Rico, the Commonwealth of the Northern Mariana Islands, and federally recognized Indian Tribal governments. Each State, Territory, or Tribal government shall designate one agency to serve as the Applicant for the program.	State emergency management agencies or a similar State office (i.e., the office that has primary emergency management or floodplain management responsibility), the District of Columbia, the U.S. Virgin Islands, American Samoa, the Commonwealth of Puerto Rico, the Commonwealth of the Northern Mariana Islands, and federally recognized Indian Tribal governments. Each State, Territory, or Tribal government shall designate one agency to serve as the Applicant for the program.	State emergency management agencies or a similar State office (i.e., the office that has primary emergency management or floodplain management responsibility), the District of Columbia, the U.S. Virgin Islands, American Samoa, the Commonwealth of Puerto Rico, the Commonwealth of the Northern Mariana Islands, and federally recognized Indian Tribal governments. Each State, Territory, or Tribal government shall designate one agency to serve as the Applicant for the program.  <b>RFC funds are only available to those States or communities that cannot meet the requirements of the FMA program for either cost share or capacity to manage the activities.</b>	State emergency management agencies or a similar State office (i.e., the office that has primary emergency management or floodplain management responsibility), the District of Columbia, the U.S. Virgin Islands, American Samoa, the Commonwealth of Puerto Rico, the Commonwealth of the Northern Mariana Islands, and federally recognized Indian Tribal governments. Each State, Territory, or Tribal government shall designate one agency to serve as the Applicant for the program.
<b>Subapplicant Eligibility</b>	<ul style="list-style-type: none"> <li>• State-level agencies;</li> <li>• Federally recognized Indian Tribal</li> </ul>	<ul style="list-style-type: none"> <li>• State-level agencies including State institutions (e.g., State hospital or university);</li> </ul>	<ul style="list-style-type: none"> <li>• State-level agencies;</li> <li>• Federally recognized Indian Tribal</li> </ul>	<ul style="list-style-type: none"> <li>• State-level agencies;</li> <li>• Federally recognized Indian Tribal</li> </ul>	<ul style="list-style-type: none"> <li>• State-level agencies;</li> <li>• Federally recognized Indian Tribal</li> </ul>

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<b>Subapplicant Eligibility (continued)</b>	<p>governments;</p> <ul style="list-style-type: none"> <li>Local governments (to include State-recognized Indian Tribes, authorized Indian Tribal organizations, and Alaska Native villages); and</li> <li>Certain private nonprofit (PNP) organizations or institutions.</li> </ul> <p>Private individuals or businesses may not apply directly to the State or FEMA, but eligible local governments or PNP organizations may apply to benefit the private entity.</p>	<ul style="list-style-type: none"> <li>Federally recognized Indian Tribal governments;</li> <li>Local governments (to include State-recognized Indian Tribes, authorized Indian Tribal organizations, and Alaska Native villages);</li> <li>Public colleges and universities; and</li> <li>Indian Tribal colleges and universities.</li> </ul> <p>Private individuals, PNP organizations, and private colleges and universities are not eligible subapplicants; however, an eligible, relevant State agency or local government may apply to the Applicant as the subapplicant for assistance to benefit the private entity.</p>	<p>governments; and</p> <ul style="list-style-type: none"> <li>Local governments (to include State-recognized Indian Tribes, authorized Indian Tribal organizations, and Alaska Native villages).</li> </ul> <p>Private individuals and PNP organizations are not eligible subapplicants. However, an eligible, relevant State agency or local government may apply to the Applicant as the subapplicant for assistance to benefit the private entity.</p>	<p>governments; and</p> <ul style="list-style-type: none"> <li>Local governments (to include State-recognized Indian Tribes, authorized Indian Tribal organizations, and Alaska Native villages).</li> </ul> <p>Private individuals and PNP organizations are not eligible subapplicants. However, an eligible, relevant State agency or local government may apply to the Applicant as the subapplicant for assistance to benefit the private entity.</p> <p><b>RFC funds are only available to those States or communities that cannot meet the requirements of the FMA program for either cost share or capacity to manage the activities.</b></p>	<p>governments; and</p> <ul style="list-style-type: none"> <li>Local governments (to include State-recognized Indian Tribes, authorized Indian Tribal organizations, and Alaska Native villages).</li> </ul> <p>Private individuals and PNP organizations are not eligible subapplicants. However, an eligible, relevant State agency or local government may apply to the Applicant as the subapplicant for assistance to benefit the private entity.</p>
<b>Eligible Project Grants</b>	<p>Projects to protect either public or private property, as long as the project fits within State and local government mitigation strategies to address areas of risk, and complies with program guidelines. Examples of projects include:</p> <ul style="list-style-type: none"> <li>Acquisition and demolition or relocation</li> </ul>	<p>Examples of projects include:</p> <ul style="list-style-type: none"> <li>Acquisition and demolition or relocation of structures, with conversion of the underlying property to deed-restricted open space;</li> <li>Elevation of existing structures to at least the BFE or an ABFE or</li> </ul>	<p>Examples of projects include:</p> <ul style="list-style-type: none"> <li>Acquisition and demolition or relocation of structures, with conversion of the underlying property to deed-restricted open space;</li> <li>Elevation of existing structures to at least the BFE or an ABFE or</li> </ul>	<p>Examples of projects include:</p> <ul style="list-style-type: none"> <li>Acquisition and demolition or relocation of structures, with conversion of the underlying property to deed-restricted open space;</li> <li>Elevation of existing structures to at least the BFE or an ABFE or</li> </ul>	<p>Examples of projects include:</p> <ul style="list-style-type: none"> <li>Acquisition and demolition or relocation of structures, with conversion of the underlying property to deed-restricted open space;</li> <li>Elevation of existing structures to at least the BFE or an ABFE or</li> </ul>

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<b>Eligible Project Grants (continued)</b>	<p>of structures, with conversion of the underlying property to deed-restricted open space;</p> <ul style="list-style-type: none"> <li>• Elevation of existing structures to at least the base flood elevation (BFE) or an advisory base flood elevation (ABFE) or higher;</li> <li>• Structural and non-structural retrofitting of existing public or private structures;</li> <li>• Dry floodproofing of non-residential structures;</li> <li>• Minor and localized flood reduction projects; and</li> <li>• Construction of safe rooms (tornado and severe wind) for public and private structures.</li> </ul>	<p>higher;</p> <ul style="list-style-type: none"> <li>• Structural and non-structural retrofitting of existing public or private structures;</li> <li>• Construction of safe rooms (tornado and severe wind) for public and private structures;</li> <li>• Hydrologic and Hydraulic studies/analyses, engineering studies and drainage studies for the purpose of project design and feasibility determination directly related to the proposed project;</li> <li>• Vegetation management for natural dune restoration, wildfire, or snow avalanche;</li> <li>• Storm water management projects to reduce or eliminate long-term risk from flood hazards; and</li> <li>• Localized flood reduction projects that are designed specifically to protect critical facilities and that do not constitute a section of a larger flood control system.</li> </ul>	<p>higher;</p> <ul style="list-style-type: none"> <li>• Dry floodproofing of non-residential structures; and</li> <li>• Minor and localized flood reduction projects.</li> </ul> <p>All properties must be NFIP insured at the time of application.</p>	<p>higher;</p> <ul style="list-style-type: none"> <li>• Dry floodproofing of non-residential structures; and</li> <li>• Minor and localized flood reduction projects (funding limited to \$1 million per project).</li> </ul> <p>All properties must be NFIP insured at the time of application.</p>	<p>higher. Mitigation reconstruction is permitted when traditional elevation cannot be implemented;</p> <ul style="list-style-type: none"> <li>• Dry floodproofing (historic properties only); and</li> <li>• Minor and localized flood reduction projects.</li> </ul> <p>All properties must be NFIP insured at the time of application.</p>

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<b>Eligible Planning Grants</b>	Planning grants are available for developing State, local, or Tribal mitigation plans. <b>Funding is available for up to 7 percent of total HMGP grant amount.</b>	Planning grants are available for: <ul style="list-style-type: none"> <li>• New plan development</li> <li>• Plan updates</li> </ul>	Planning grants are available for planning activities that support the flood hazard component of a State, Indian Tribal, or local mitigation plan that meets the planning criteria outlined in 44 Code of Federal Regulations (CFR) Part 201.	<b>Planning grants are not available.</b>	<b>Planning grants are not available.</b>
<b>Eligible Management Costs</b>	<b>For disasters declared prior to November 13, 2007:</b> The HMGP provides three categories of “direct administrative costs”: <ul style="list-style-type: none"> <li>• State management;</li> <li>• Grantee administrative; and</li> <li>• Subgrantee administrative.</li> </ul> <b>For disasters declared after November 13, 2007:</b> Administrative costs, management costs, and indirect costs are included in a single Management Cost rate. The amount of Management Cost available to the Grantee is based on a flat rate of 4.89 percent of the projected Federal funding for HMGP. Grantees determine the percentage or amount to pass through to subgrantees.	Management costs are available to support the planning and project subapplications: <ul style="list-style-type: none"> <li>• Applicants/Grantees up to 10 percent of total funds requested; and</li> <li>• Subapplicants/subgrantees up to 5 percent of total funds requested.</li> </ul>	Management costs are available to support the planning and project subapplications: <ul style="list-style-type: none"> <li>• Applicants/Grantees up to 10 percent of total funds requested; and</li> <li>• Subapplicants/subgrantees up to 5 percent of total funds requested.</li> </ul>	Management costs are available to support the project subapplications: <ul style="list-style-type: none"> <li>• Applicants/Grantees up to 10 percent of total funds requested; and</li> <li>• Subapplicants/subgrantees up to 5 percent of total funds requested.</li> </ul>	Management costs are available to support the project subapplications: <ul style="list-style-type: none"> <li>• Applicants/Grantees up to 10 percent of total funds requested; and</li> <li>• Subapplicants/subgrantees up to 5 percent of total funds requested.</li> </ul>

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<b>Planning Requirements</b>	All States/Tribes/Territories must have a FEMA-approved and adopted State/Tribal Standard or Enhanced Mitigation Plan to receive HMGP funds. In addition, all subapplicants must have a FEMA-approved local mitigation plan in accordance with 44 CFR Parts 201.6 and 206.434(b) to be eligible to receive project grant funding under the HMGP. All activities submitted for consideration must be consistent with the Grantee's State/Tribal standard or enhanced hazard mitigation plan and the subapplicant's Tribal/local/university hazard mitigation plan for the local jurisdiction in which the activity is located.	All Applicants must have a FEMA-approved State Mitigation Plan (Standard or Enhanced) or Tribal Mitigation Plan by the application deadline to be eligible to apply for project grant funding under the PDM program in accordance with 44 CFR Part 201. In addition, all subapplicants must have a FEMA-approved mitigation plan by the application deadline to be eligible to apply for project grant funding under the PDM program.  Projects submitted for consideration must be consistent with the goals and objectives identified in the current FEMA-approved State/Tribal Mitigation Plan and the Tribal/local/university mitigation plan for the jurisdiction in which the activity is located.  If any plan is due to lapse soon after application, the project award may be held pending approval of a new or updated plan.	All Applicants must have a FEMA-approved State Mitigation Plan (Standard or Enhanced) or Tribal Mitigation Plan by the application deadline to be eligible to receive project grant funding under the FMA program, in accordance with 44 CFR Part 201. In addition, all subapplicants must have a FEMA-approved mitigation plan by the application deadline to be eligible to receive project grant funding under the FMA program.  In order to be eligible for an increased Federal cost share of up to 90 percent for severe repetitive loss properties, the FEMA-approved State or Tribal Standard Mitigation Plan in effect at the time of grant award must address repetitive loss properties.  If any plan is due to lapse soon after application, the project award may be held pending approval of a new or updated plan.	All Applicants must have a FEMA-approved State Mitigation Plan (Standard or Enhanced) or Tribal Mitigation Plan by the application deadline to be eligible to receive project grant funding under the RFC program, in accordance with 44 CFR Part 201.  If any plan is due to lapse soon after application, the project award may be held pending approval of a new or updated plan.  <b>No local plan requirement.</b>	All Applicants must have a FEMA-approved State Mitigation Plan (Standard or Enhanced) or Tribal Mitigation Plan by the application deadline to be eligible to receive project grant funding under the SRL program, in accordance with 44 CFR Part 201. In addition, all subapplicants must have a FEMA-approved mitigation plan by the application deadline to be eligible to receive project grant funding under the SRL program.  In order to be eligible for an increased cost share of up to 90 percent, the FEMA-approved State or Tribal Mitigation Plan in effect at the time of grant award must address repetitive loss properties.  If any plan is due to lapse soon after application, the project award may be held pending approval of a new or updated plan.
<b>Application Process</b>	The primary responsibility for selecting and administering mitigation activities resides with the	Applicants must apply electronically via FEMA's eGrants application, available at	Applicants must apply electronically via FEMA's eGrants application, available at	Applicants must apply electronically via FEMA's eGrants application, available at	Applicants must apply electronically via FEMA's eGrants application, available at

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<b>Application Process (continued)</b>	State. The State sets mitigation priorities and selects project subapplications that are developed and submitted by local jurisdictions. Although individuals may not apply directly to the State for assistance, local governments may sponsor an application on their behalf. After its eligibility review, the State forwards subapplications consistent with State mitigation planning objectives to FEMA for review and approval.	<a href="https://portal.fema.gov">https://portal.fema.gov</a> . Subapplicants apply directly to the Applicant, who reviews and prioritizes the subapplications. The Applicant submits the Grant application with subapplications to FEMA for review and approval.	<a href="https://portal.fema.gov">https://portal.fema.gov</a> . Subapplicants apply directly to the Applicant, who reviews and prioritizes the subapplications. The Applicant submits the Grant application with subapplications to FEMA for review and approval.	<a href="https://portal.fema.gov">https://portal.fema.gov</a> . Subapplicants apply directly to the Applicant, who reviews and prioritizes the subapplications. The Applicant submits the Grant application with subapplications to FEMA for review and approval.	<a href="https://portal.fema.gov">https://portal.fema.gov</a> . Subapplicants apply directly to the Applicant, who reviews and prioritizes the subapplications. The Applicant submits the Grant application with subapplications to FEMA for review and approval.
<b>Available Funds</b>	Federal funding under the HMGP is available following a major disaster declaration, if requested by the Governor. As of October 4, 2006, if a State has a FEMA-approved Standard State Mitigation plan, HMGP funds are available based on up to 15 percent for amounts not more than \$2 billion of the total of Public and Individual Assistance funds authorized for the disaster; up to 10 percent for amounts of \$2 billion to not more than \$10 billion; 7.5 percent for amounts of \$10 billion to not more than \$35.333 billion. If a State	Pending Appropriation.	Pending Appropriation.	Pending Appropriation.	Pending Appropriation.

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<b>(continued)</b>	has a FEMA-approved Enhanced Mitigation plan, HMGP funds are available based on up to 20 percent of the total of Public and Individual Assistance funds authorized for the disaster.				
<b>Cost-Share Requirements</b>	HMGP grant funds may be used to pay up to 75 percent of the eligible project costs. The non-Federal match does not need to be cash; in-kind services or materials may be used.	FEMA may contribute up to 75 percent Federal funding for the amount approved under the grant award to implement approved activities.  Small and impoverished communities may be eligible for up to a 90 percent Federal cost share.	FEMA may contribute up to 75 percent Federal funding for the amount approved under the grant award to implement approved activities.  An increased Federal cost share of up to 90 percent is available for the mitigation of severe repetitive loss properties for any Applicant that has taken actions to reduce the number of repetitive loss properties, including severe repetitive loss properties, and has a FEMA-approved State or Tribal Mitigation Plan that specifies how it has reduced, and how it intends to reduce, the number of such repetitive loss properties.	FEMA may contribute up to 100 percent Federal funding for the amount approved under the grant award to implement approved activities.	FEMA may contribute up to 75 percent Federal funding for the amount approved under the grant award to implement approved activities.  An increased Federal cost share of up to 90 percent is available for any Applicant that has taken actions to reduce the number of repetitive loss properties, including severe repetitive loss properties, and has a FEMA-approved State or Tribal Mitigation Plan that specifies how it has reduced, and how it intends to reduce, the number of such repetitive loss properties.
<b>Distribution of Funds</b>  <b>Distribution of</b>	The HMGP is administered by the State. The mitigation planning and application development process begins at the local level. States prioritize local subapplications and select projects for funding.	Grants are awarded on a competitive basis. Eligible subapplications will compete nationally for grant funds.	Applicants may receive a FMA project and planning target allocation based on the national percentage of NFIP policies present within the jurisdiction. An Applicant may apply for funding up to or exceeding	Grants are awarded on a competitive basis. Eligible subapplications will compete nationally for grant funds.	Applicants may receive a target allocation based on the national percentage of severe repetitive loss properties present within the jurisdiction. An Applicant may apply for funding up to or exceeding its target

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<b>Funds (continued)</b>			its target allocation.		allocation. Applicants that do not meet the minimum threshold to receive a target allocation will be eligible to apply for a 10 percent set-aside of the SRL funds.
<b>Application Deadline</b>	Generally, subapplications must be submitted to the State for consideration within 12 months following a disaster declaration.	Applicants must submit an FY09 grant application through the eGrants system to the appropriate FEMA Regional Office by December 19, 2008, at 11:59:59 p.m. Eastern Standard Time.  All supporting documentation that cannot be attached to the eGrants system must be received by the FEMA Regional Office by the application deadline.	Applicants must submit an FY09 grant application through the eGrants system to the appropriate FEMA Regional Office by December 19, 2008, at 11:59:59 p.m. Eastern Standard Time.  All supporting documentation that cannot be attached to the eGrants system must be received by the FEMA Regional Office by the application deadline.	Applicants must submit an FY09 grant application through the eGrants system to the appropriate FEMA Regional Office by December 19, 2008, at 11:59:59 p.m. Eastern Standard Time.  All supporting documentation that cannot be attached to the eGrants system must be received by the FEMA Regional Office by the application deadline.	Applicants must submit an FY09 grant application through the eGrants system to the appropriate FEMA Regional Office by December 19, 2008, at 11:59:59 p.m. Eastern Standard Time.  All supporting documentation that cannot be attached to the eGrants system must be received by the FEMA Regional Office by the application deadline.
<b>Application Review</b>	Project subapplications are reviewed by the State to ensure all program requirements are met. States should submit eligible subapplications for funding.  There are five minimum criteria that all projects must meet in order to be considered for funding: <ul style="list-style-type: none"><li>• Conforms with the State Hazard Mitigation Plan;</li><li>• Provides beneficial impact upon the designated disaster area;</li></ul>	Project subapplications are reviewed by the Applicant to ensure all program requirements are met. Applicants should submit eligible subapplications for funding.  Applications and subapplications are reviewed by FEMA for: <ul style="list-style-type: none"><li>• Eligibility and completeness;</li><li>• Cost effectiveness;</li><li>• Engineering feasibility</li></ul>	Project subapplications are reviewed by the Applicant to ensure all program requirements are met. Applicants should submit eligible subapplications for funding.  Applications and subapplications are reviewed by FEMA for: <ul style="list-style-type: none"><li>• Eligibility and completeness;</li><li>• Cost effectiveness;</li><li>• Engineering feasibility</li></ul>	Project subapplications are reviewed by the Applicant to ensure all program requirements are met. Applicants should submit eligible mitigation project subapplications for funding.  Project applications and subapplications are reviewed by FEMA for: <ul style="list-style-type: none"><li>• Eligibility and completeness;</li><li>• Cost effectiveness;</li><li>• Engineering feasibility</li></ul>	Project subapplications are reviewed by the Applicant to ensure all program requirements are met. Applicants should submit eligible mitigation project subapplications for funding.  Project applications and subapplications are reviewed by FEMA for: <ul style="list-style-type: none"><li>• Eligibility and completeness;</li><li>• Cost effectiveness;</li><li>• Engineering feasibility</li></ul>
<b>Application</b>					

Program Element	Hazard Mitigation Grant Program (HMGP)	Pre-Disaster Mitigation (PDM)	Flood Mitigation Assistance (FMA)	Repetitive Flood Claims (RFC)	Severe Repetitive Loss (SRL)
<b>Review (continued)</b>	<ul style="list-style-type: none"> <li>• Conforms with environmental laws and regulations;</li> <li>• Solves a problem independently or constitutes a function portion of a solution; and</li> <li>• Is cost-effective.</li> </ul>	<p>and effectiveness; and</p> <ul style="list-style-type: none"> <li>• Environmental/Historic Preservation compliance.</li> </ul> <p>National Ranking - FEMA will score all eligible planning and project subapplications on the basis of predetermined, objective, quantitative factors to calculate a National Ranking Score.</p> <p>National Evaluation - National panels chaired by FEMA and composed of representatives from FEMA Headquarters and Regions, other Federal agencies, States, federally-recognized Indian Tribal governments, Territories, and local governments convene to evaluate planning and project subapplications on the basis of additional pre-determined qualitative factors.</p> <p>Technical Review - FEMA conducts technical reviews for Benefit Cost and Engineering Feasibility on the highest scoring project subapplications representing approximately 150 percent of available funding.</p>	<p>and effectiveness; and</p> <ul style="list-style-type: none"> <li>• Environmental/Historic Preservation compliance.</li> </ul>	<p>and effectiveness; and</p> <ul style="list-style-type: none"> <li>• Environmental/Historic Preservation compliance.</li> </ul>	<p>and effectiveness; and</p> <ul style="list-style-type: none"> <li>• Environmental/Historic Preservation compliance.</li> </ul>