

This letter explains the process flow agreed between the Iowa Homeland Security Emergency Management Division (IHSEMD), the State Historical Society of Iowa (SHSI) and the Federal Emergency Management Agency (FEMA) for selected activities associated with historic structures conducted in support of demolitions under the Health & Safety and Hazard Mitigation Grant Programs. These activities stem from requirements of the National Historic Preservation Act (the Act) and are bounded by it. This process flow is an administrative procedure. Substantive requirements of the Act are detailed in 36 CFR Part 800, the Programmatic Agreement dated 11/24 and Memoranda of Agreement prepared in response to specified undertakings.

When demolitions are undertaken FEMA is required to identify historic properties within the area of potential effect. Because the affect of demolition to an historic property is adverse FEMA is also required to evaluate mitigation alternatives. One possible mitigation alternative is establishment of revised or new historic districts. In addition, demolition of historic properties can affect the integrity of existing historic districts.

In order to fulfill its statutory requirements FEMA works with IHSEMD and SHSI. These organizations desire to develop efficient methods to identify historic structures, evaluate the impact of demolition on existing historic districts and be aware of opportunities to revise or designate additional historic districts. To accomplish this we have agreed on the following process:

1. IHSEMD will complete reconnaissance surveys (surveys) in demolition areas.
2. IHSEMD will submit a copy of the draft survey report to FEMA Special Considerations and the local Certified Local Government (CLG) if one is present and provide FEMA and the CLG with an opportunity to comment within two weeks.
3. IHSEMD will incorporate any comments into the survey report and submit paper and digital copies of the reconnaissance survey report to the SHSI within one week. Surveys should be submitted to June Strand, Review and Compliance Coordinator, Iowa State Historic Preservation Office.
4. The SHSI will review the findings and accept the survey or ask for additional information from the survey team within 10 business days.
5. SHSI will provide FEMA Special Considerations with a recommendation in the form of a letter of concurrence/non-concurrence and a digital copy of the survey immediately following review.
6. Upon initiation of a federal undertaking FEMA will identify historic properties by reference to the SHSI letter of concurrence/non-concurrence.

This process will be implemented on Friday, February 7, 2009. Commencing on that date SHSI will collect SHSI Inventory forms for pickup by IHSEMD. SHSI will take no action with respect to these forms.