



FEMA

January 30, 2025

W. Nim Kidd, MPA, CEM
Chief, Texas Division of Emergency Management
Vice Chancellor - The Texas A&M University System
2883 Highway 71 East
P.O. Box 285
Del Valle, TX 78617-9998

Attn: Ms. Michelle Ellis, State Hazard Mitigation Officer

RE: DR-4705-0026-TX
City of Burnet – City of Burnet Generators
Assistance Listing 97.039 Hazard Mitigation Grant Program

Dear Chief Kidd:

This letter provides official notification that the Federal Emergency Management Agency (FEMA) approves the application submitted by the City of Burnet for the City of Burnet Generators project. The total project cost is \$1,062,400.00. The Federal share in the amount of \$796,800.00, is available through the Hazard Mitigation Grant Program (HMGP) under FEMA-4705-DR-TX. The non-federal match requirement of \$265,600.00 will be provided by City of Burnet.

Pursuant to Section 1215 of the Disaster Recovery Reform Act of 2018, which amended Section 324 of the Robert T. Stafford Disaster Relief and Assistance Act, subrecipient Management Costs (MC) in the amount of \$53,000.00 are available to the City of Burnet at a Federal Cost Share of 100%.

The following is the approved Scope of Work (SOW) for the above-referenced project:

The City of Burnet in Burnet County, TX proposes to install four permanent backup generators at four critical facilities: one water treatment plant, two pump stations, and one lift station. The proposed sites will have electrical upgrades to be able to accept the generators and protective fencing will be installed where one does not already existing. The generators will be mounted to concrete pads.

Generators that have been approved as components in this project's SOW are listed below.

Generator Site Name	Generator Street Address	Generator Size	Portable/ Permanent	Latitude	Longitude
Main Street Water Plant	701 N. Main St.	500kW	Permanent	30.764514	-98.228966
Eagles Nest Pump Station	Big Sky	200kW	Permanent	30.768109	-98.268969
East Tank Pump Station	1804 Wofford	250kW	Permanent	30.767617	-98.209726
Delaware Ranch Lift Station	201 Sunday Dr.	175kW	Permanent	30.720910	-98.243638

This project has been determined to be Categorically Excluded (CATEX) in accordance with FEMA Instruction 108-1-1 and Department of Homeland Security (DHS) Instruction 023-01-001-01; CATEX n18 from the need to prepare either an Environmental Impact Statement or Environmental Assessment. No extraordinary circumstances in accordance with DHS Instruction 023-01-001-01 have been identified regarding this action. The applicant must comply with all conditions set forth in the attached Record of Environmental Consideration (REC). Failure to comply with these conditions may jeopardize federal assistance including funding.

Technical Conditions

Subrecipient must coordinate with the local floodplain administrator to obtain required permits. The subrecipient must comply with any conditions of the permit(s) prior to initiating work. All permits and coordination pertaining to these activities must be retained by the subrecipient. Submit permits and documentation of coordination to FEMA at closeout. Subrecipient must acquire all applicable federal, state, tribal and/or local permits.

FEMA will not establish activity completion timeframes for individual sub awards. The Period of Performance (POP) for DR-4705-TX is set to expire on October 18, 2028. It is the responsibility of the Recipient and subrecipient to ensure all approved activities associated with this sub-award are completed by the end of the POP. Any costs incurred prior to the date of this approval or after the POP will be disallowed.

A change to the approved SOW requires prior approval from FEMA. The National Environmental Policy Act (NEPA) stipulates that additions or amendments to a HMGP SOW shall be reviewed by all state and federal agencies participating in the NEPA process. NEPA sign-off for all SOW additions or amendments is essential before the revised SOW can be approved by FEMA or implemented by the HMGP subrecipient.

In accordance with 2023 Hazard Mitigation Assistance Program and Policy Guidance HMGP MC, any MC provided will be obligated in increments sufficient to cover Recipient and subrecipient needs for no more than one year unless contractual agreements require additional funding. Actual subrecipient MC are to be reconciled quarterly during the review of expenditures

submitted by the subrecipient through quarterly report process. Subrecipient MC can be expended for a maximum time of 180 days after work is completed for the subaward or the end of the POP, whichever is sooner.

The initial quarterly progress reports for the HMGP project are due at the end of the approving quarter. Please include this HMGP project in your future quarterly reports. Title 44 of the Code of Federal Regulations (44 C.F.R.) § 206.438(c) indicates the State must provide a quarterly progress report to FEMA indicating the status and completion date for each project funded. The report will include any problems or circumstances affecting completion dates, SOW, or project cost that may result in non-compliance with the approved grant conditions.

Pursuant to Title 2 C.F.R § 200.403 et seq. all costs, to include engineering fees, must be adequately documented, necessary and reasonable for the performance of the federal award and be allocable thereto under these principles except where otherwise authorized by statute. FEMA approval of a project budget is not a determination of the allowability of costs. Future amendments and closeout will require itemized budgets (no lump sums).

In accordance with HMGP rules and policy, we require the submittal of all closeout documentation within 120 days of the project completion, not to exceed POP. Section 206.438(d) of 44 C.F.R. requires the Governors Authority Representative to “certify that reported costs were incurred in the performance of eligible work, that the approved work was completed, and that the mitigation measure is in compliance with the provisions of the FEMA-State Agreement.”

The Obligation Report, REC, and Technical Recommendation Report are included for your records.

If you have any questions regarding the information, please contact Angela Rivera-Watts, Hazard Mitigation Assistance (HMA) Specialist, at (202) 710-6282 or Angela.Rivera-Watts@fema.dhs.gov.

Sincerely,



FOR Marty Chester
Acting HMA Disaster Branch Chief

Enclosures: Obligation Report
REC
Technical Recommendation Report

RECORD OF ENVIRONMENTAL CONSIDERATION (REC)

Project HMGP-4705-0026-TX (1)
Title: City of Burnet Generator Project

NEPA DETERMINATION

Non Compliant Flag: No

EA Draft Date:

EA Final Date:

EA Public Notice Date:

EA Fonsi

Level: CATEX

EIS Notice of Intent

EIS ROD Date:

Comment The City of Burnet in Burnet County, TX proposes to install 4 permanent backup generators at four critical facilities: one water treatment plant, two pump stations, and one lift station. The proposed sites will have electrical upgrades in order to be able to accept the generator and protective fencing will be installed where not already existing. The generators will be mounted to concrete pads. Each fuel tank provided will be double walled and have fuel leak detection.

- *. Main Street Water Plant (30.764514, -98.228966)
- *. Eagles Nest Pump Station (30.768109, -98.268969)
- *. East Tank Pump Station (30.767617, -98.209726)
- *. Delaware Ranch Lift Station (30.720910, -98.243638)

This project has been determined to be Categorically Excluded from the need to prepare either an Environmental Impact Statement or Environmental Assessment in accordance with FEMA Instruction 108-1-1 and DHS Instruction 023-01-001-01; CATEX N18. Particular attention should be given to the project conditions before and during project implementation. Failure to comply with these conditions may jeopardize federal assistance including funding.
- dcook125 - 08/26/2024 18:17:27 GMT

CATEX CATEGORIES

Catex Category Code	Description	Selected
*n18	(*n18) Federal Assistance for Construction or Installation of Structures, Facilities, or Equipment to Ensure Continuity of Operations. Federal assistance for the construction or installation of measures for the purpose of ensuring the continuity of operations during incidents such as emergencies, disasters, flooding, and power outages involving less than one acre of ground disturbance. Examples include the installation of generators, installation of storage tanks of up to 10,000 gallons, installation of pumps, construction of structures to house emergency equipment, and utility line installation. This CATEX covers associated ground disturbing activities, such as trenching, excavation, and vegetation removal of less than one acre, as well as modification of existing structures.	Yes

EXTRAORDINARY

Extraordinary Circumstance Code	Description	Selected ?
	No Extraordinary Circumstances were selected	

ENVIRONMENTAL LAW / EXECUTIVE ORDER

Environmental Law/ Executive Order	Status	Description	Comment
Clean Air Act (CAA)	Completed	Project will not result in permanent air emissions - Review concluded	

RECORD OF ENVIRONMENTAL CONSIDERATION (REC)

Project HMGP-4705-0026-TX (1)

Title: City of Burnet Generator Project

Environmental Law/ Executive Order	Status	Description	Comment
Coastal Barrier Resources Act (CBRA)	Completed	Project is not on or connected to CBRA Unit or otherwise protected area - Review concluded	
Clean Water Act (CWA)	Completed	Project would not affect any water of the U.S. - Review concluded	
Coastal Zone Management Act (CZMA)	Completed	Project is not located in a coastal zone area and does not affect a coastal zone area - Review concluded	
Executive Order 11988 - Floodplains	Completed	No effect on floodplain/flood levels and project outside floodplain - Review concluded	Per Flood Insurance Rate Map (FIRM) panels 48053C0325G, 48053C0338G, 48053C0339G, and 48053C0480G dated 11/1/2019, the project is located outside the 500- year floodplain, special flood hazard area and the activity does not adversely affect floodplain values. - dcook125 - 08/26/2024 18:19:19 GMT
Executive Order 11990 - Wetlands	Completed	No effects on wetlands and project outside wetlands - Review concluded	A review of the National Wetland Inventory (NWI) online mapper, accessed on 08/26/2024, for the site indicates that the area is not located within, nor does it affect a designated wetland. - dcook125 - 08/26/2024 18:19:29 GMT
Executive Order 12898 - Environmental Justice for Low Income and Minority Populations	Completed	Low income or minority population in or near project area	This project has been determined to have no potential to have disproportionately high and adverse human health or environmental effects on minority or low-income populations according to FEMA's EO 12898 Guidance or input from EHP Leadership. FEMA has no further EO 12898 responsibilities with regard to these activities. - dcook125 - 08/26/2024 18:19:43 GMT
	Completed	No disproportionately high and adverse impact on low income or minority population - Review concluded	
Endangered Species Act (ESA)	Completed	Listed species and/or designated critical habitat present in areas affected directly or indirectly by the federal action	
	Completed	No effect to species or designated critical habitat (See comments for justification) - Review concluded	
Farmland Protection Policy Act (FPPA)	Completed	Project does not affect designated prime or unique farmland - Review concluded	

RECORD OF ENVIRONMENTAL CONSIDERATION (REC)

Project HMGP-4705-0026-TX (1)
Title: City of Burnet Generator Project

Environmental Law/ Executive Order	Status	Description	Comment
Fish and Wildlife Coordination Act (FWCA)	Completed	Project does not affect, control, or modify a waterway/body of water - Review concluded	
Migratory Bird Treaty Act (MBTA)	Completed	Project located within a flyway zone	
	Completed	Project does not have potential to take migratory birds - Review concluded	
Magnuson-Stevens Fishery Conservation and Management Act (MSA)	Completed	Project not located in or near Essential Fish Habitat - Review concluded	
National Historic Preservation Act (NHPA)	Completed	Applicable executed Programmatic Agreement. Activity meets Programmatic Allowance (enter date and # in comments) - Review concluded	The scope of work has been reviewed and meets the criteria in Appendix B - Programmatic Allowances, Tier II; Section A.3.b, D.2.a. of FEMA's Programmatic Agreement (PA) dated March 16, 2022. In accordance with this PA, FEMA is not required to determine the National Register eligibility of properties where work performed meets the Appendix B criteria. The scope of work has been reviewed and FEMA has determined, based on Tribal preferences, that the project will not require Tribal Consultation. - smcgo2 - 08/26/2024 17:53:37 GMT
Resource Conservation and Recovery Act, aka Solid Waste Disposal Act (RCRA)	Completed	Review concluded	
Wild and Scenic Rivers Act (WSR)	Completed	Project is not along and does not affect Wild and Scenic River - Review concluded	

CONDITIONS

Special Conditions required on implementation of Projects:

Unusable equipment, debris and material shall be disposed of in an approved manner and location. In the event significant items (or evidence thereof) are discovered during implementation of the project, applicant shall handle, manage, and dispose of petroleum products, hazardous materials and toxic waste in accordance to the requirements and to the satisfaction of the governing local, state and federal agencies.

Source of condition: Resource Conservation and Recovery Act, aka Solid Waste Disposal Act (RCRA) Monitoring Required: No

Standard Conditions:

RECORD OF ENVIRONMENTAL CONSIDERATION (REC)

Project HMGP-4705-0026-TX (1)

Title: City of Burnet Generator Project

Any change to the approved scope of work will require re-evaluation for compliance with NEPA and other Laws and Executive Orders.

This review does not address all federal, state and local requirements. Acceptance of federal funding requires recipient to comply with all federal, state and local laws. Failure to obtain all appropriate federal, state and local environmental permits and clearances may jeopardize federal funding.

If ground disturbing activities occur during construction, applicant will monitor ground disturbance and if any potential archeological resources are discovered, will immediately cease construction in that area and notify the State and FEMA.

Record of Technical Consideration and Benefit Cost Summary

Project Summary

Program:	HMGP
Project Number:	4705-0026
Sub-Recipient:	City of Burnet
County or Parish:	Burnet County, Texas
Project Title:	City of Burnet Generators
Project Type:	Generator
Phase:	Non-phased
Project Budget:	\$1,062,400
Issue Date:	11/26/2024

BCA Summary

Analyst:	Subrecipient
Projected Benefit:	\$2,375,040
Projected Cost:	\$1,062,400
Total Cost:	\$1,232,772
Benefit Cost Ratio:	1.93
Benefit Coast Analysis Tool Used:	Benefit-Cost Calculator V.6.0.
Hazard Type Analysis:	Generator
Property Structure Type	Utilities
Type of Service:	Potable Water and Wastewater
Number of Generators:	4: 500 kW, 200 kW, 250 kW, 175 kW
BCA Reanalysis:	No



FEMA

Analyst:	Subrecipient
FEMA:	Recommended
BCA File Name	BCA---City-of-Burnet-Emergency-Generators-02-02-2024_1122191.xlsx

Objective

The main objective is to review the information submitted by the subrecipient to ensure completeness, adherence to programmatic guidelines and cost allowability and to determine if there are any pre award conditions that should be applied to the project prior to the award of funding. Additionally, the project will be reviewed for post award conditions that will be required for closeout. Project data and information submitted should have enough information to demonstrate the project is sustainable and cost-effective and will be designed to reduce the risk to individuals and property from future natural hazards, while also reducing reliance on federal funding from future disasters

Scope of Work

The City of Burnet in Burnet County, TX proposes to install 4 permanent backup generators at four critical facilities: one water treatment plant, two pump stations, and one lift station. The proposed sites will have electrical upgrades in order to be able to accept the generator and protective fencing will be installed where not already existing. The generators will be mounted to concrete pads. Each fuel tank provided will be double walled and have fuel leak detection. The proposed site locations can be found in Table 1 below.

The project will be in compliance with latest edition of codes and standards required by Federal, State and Local Rules and regulations.

Table 1: Generator Size/Location

Name	Size	Latitude	Longitude	Flood Zone	Source of Flood Data
Main Street Water Plant	500kW	30.764514	-98.228966	Zone X, Unshaded	48053C0338G, Eff. 11/1/2019
Eagles Nest Pump Station	200kW	30.768109	-98.268969	Zone X, Unshaded	48053C0325G, Eff. 11/1/2019
East Tank Pump Station	250kW	30.767617	-98.209726	Zone X, Unshaded	48053C0339G, Eff. 11/1/2019
Delaware Ranch Lift Station	175kW	30.720910	-98.243638	Zone X, Unshaded	48053C0480G, Eff. 11/1/2019

Benefit Cost Analysis

A Benefit Cost Analysis (BCA) was completed, the following information was applied:

	Data	Data Used in BCA	Source
1	Project Useful Life	19 years	BCA Generated standard values
2	Cost	\$1,062,400	Provided by Subrecipient
3	Maintenance Cost	\$12,000	Provided by Subrecipient
4	Number of Customers	2,650	Provided by Subrecipient
5	Damages Before Mitigation	Professional Expected	BCA Generated standard values
6	Damages After Mitigation	Professional Expected	BCA Generated standard values

Conditions

1. Subrecipient must coordinate with the local floodplain administrator to obtain required permits. The subrecipient must comply with any conditions of the permit(s) prior to initiating work. All permits and coordination pertaining to these activities must be retained by the subrecipient. Submit permits and documentation of coordination to FEMA at closeout.
2. Subrecipient must acquire all applicable federal, state, tribal and/or local permits.
3. FEMA approved BCA file titled, "BCA--City-of-Burnet-Emergency-Generators-02-02-2024_1122191.xlsx", must be used for any future scope of work and/or budget modifications.