



November 8, 2021

Tennis Wick
Director, Permit Sonoma
Sonoma County
2550 Ventura Avenue
Santa Rosa, CA 95404

Subject: **Notification of Subapplication Approval**
Hazard Mitigation Grant Program – Post Fire
FEMA-**5293**-PF-CA, Project #**PJ0057**, FIPS #**097-00000**,
Supplement #1

Dear Mr. Wick:

The California Governor's Office of Emergency Services (Cal OES) received notification that the Federal Emergency Management Agency (FEMA) has approved your organization's subaward application in the amount of **\$276,817.35**. A copy of the FEMA award package is enclosed for your records. In order to receive payment as a grant subrecipient, your organization must have the following on file with the Recovery Financial Processing Unit:

- A valid, current (approved within the last 3 years) Governing Body Resolution
- A Project Assurances for Federal Assistance agreement
- A Supplemental Grant Subaward Information sheet
- A current Federal Funding Accountability and Transparency Act (FFATA) Financial Disclosure form. This form must be submitted each fiscal year.
- An active DUNS Number registration with the federal System for Award Management (SAM) website. The registration must remain active for the duration of this grant subaward.

For your convenience, this subapplication approval package includes the required post-obligation documents as well as guides to completing and renewing a SAM registration. Please complete the documents and mail copies to the address listed at the end of this letter, keeping the originals with your records. Alternatively, you may scan and email the completed documents to the Recovery Financial Processing Unit at HMGrantsPayments@CalOES.ca.gov. Electronic copies of the post-obligation documents can also be requested at the same address.



3650 SCHRIEVER AVENUE • MATHER, CA 95655
RECOVERY FINANCIAL PROCESSING UNIT
(916) 845-8110

Payments will be made on a reimbursement basis using the enclosed Hazard Mitigation Reimbursement Request Form. A ten percent (10%) retention will be withheld from all reimbursement payments and will be released as part of the subaward closeout process.

Reimbursements can be made only for items listed on the approved subaward application. Expenditures for any other work should be separately maintained and are the sole responsibility of the subrecipient. Any funds received in excess of current needs or approved amounts, or those found owed as a result of a final inspection or audit, must be refunded to the State within 30 days of receipt of an invoice from Cal OES.

When mailing documents to the Recovery Financial Processing Unit, please use the following address:

California Governor's Office of Emergency Services
Attention: Recovery Financial Processing Unit
3650 Schriever Avenue
Mather, CA 95655

For further assistance regarding post-obligation documents or the reimbursement request process, please contact the Recovery Financial Processing Unit at (916) 845-8110 or at HMGrantsPayments@caloes.ca.gov. For program-related questions, please contact the Hazard Mitigation Grants Programs Unit at (916) 845-8150.

Recovery Financial Processing Unit

Enclosures

c: Subrecipient's Project File

*The Recovery Financial Processing Unit has universal Resolution No. 20-0133, passed on 4/21/20, on file. A copy of the resolution is included in this package for your review. With your permission, the resolution can be applied to this project.

**The Recovery Financial Processing Unit has a current FFATA Financial Disclosure form on file for your organization. There is no need to resubmit the document to Cal OES for this fiscal year.



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(916) 845-8110



U.S. Department of Homeland Security
Region 9
1111 Broadway, Suite 1200
Oakland, California 94607

FEMA

October 26, 2021

RECEIVED
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FINANCIAL PROCESSING UNIT

Mark S. Ghilarducci, Director
Governor's Authorized Representative
California Governor's Office of Emergency Services
3650 Schriever Avenue
Mather, CA 95655

Reference: Phase 1 Approval, HMGP FM-5293-057-02R
Sonoma County, California
Wildfire Adapted Part 2, Phase 1
FIPS Code: 097-00000, Supplement 1

Dear Mr. Ghilarducci:

We approve and issue Hazard Mitigation Grant Program (HMGP) Post-Fire funds for the Sonoma County (sub-recipient), HMGP FM-5293-057-02R, Wildfire Adapted Part 2, Phase 1.

The total project cost for Phase 1 is \$369,089.80. As shown in the enclosed Obligation Report - Supplement 1, we are obligating \$276,817.35 for the 75 percent Federal share; the 25 percent non-Federal share is \$92,272.45. These funds are available in SmartLink for immediate and eligible disbursements. The following is a summary of the approved funding:

Project Phase:	Federal Share:	Non-Federal Share:	Total Project Cost:
Phase 1, Supplement 1	\$276,817.35	\$92,272.45	\$369,089.80

This HMGP project approval and obligation of funds are subject to the following conditions:

- 1. Scope of Work (SOW)** – Phase 1 will include providing targeted information to property owners and residents about proven methods to create defensible space around the home and reduce structural vulnerabilities that can lead to home ignition. Educational outreach will include a combination of print materials, social media outreach, and virtual community meetings. In addition to increasing awareness of fire-adapted principles, outreach will also focus on having local communities create Fire Safe Councils or become Firewise Communities. Permit Sonoma will inspect every accessible structure in identified project areas. Inspection reports with specific requirements and recommendations for complying with defensible space standards will be delivered to the homeowners. Voluntary WUI building inspections will be comprehensive, identifying any vulnerabilities identified in the county building code as well as recommendations based on current research on home

ignitions. Homeowners will be given a comprehensive report of vulnerabilities and mitigation strategies.

The following Phase 1 activities and deliverables are expected:

Phase 1 Activity	Estimated Timeline
Outreach	6 Months
Defensible Space Assessment	6 Months
Structural Hardening Assessment	6 Months
Environmental Compliance	2 Months
Phase 1 Closeout and Revised BCA	1 Months

Please provide the above-referenced deliverables once completed to the assigned FEMA Hazard Mitigation Assistant (HMA) Specialist for review and inclusion within the official grant file.

- Phase 1 Completion Date** – The work schedule included with the project application indicates that Phase 1 will take 21 months to complete; therefore, the Phase 1 completion date is July 26, 2023. All Phase 1 project deliverables must be submitted to the assigned FEMA HMA Specialist by the Phase 1 completion date. Please inform the sub-recipient that work completed after this date is not eligible for federal funding, and that federal funds may be de-obligated for work completed outside the completion date when there is no approved time extension.
- Phase 2 Approval** – Please inform the sub-recipient that Phase Two approval is contingent on programmatic review and Environmental and Historical Preservation (EHP) approval. Phase Two activities may not commence until written approval has been received. Any Phase Two activities completed prior to approval may be de-obligated. In addition, if Phase Two is unapproved, federal funds may be de-obligated for previously completed Phase 1 activities.
- Record of Environmental Considerations (REC)** – Phase 1 (Design) of this project has been determined to be Categorical Excluded from the need to prepare either an Environmental Impact Statement or Environmental Assessment in accordance with FEMA Instruction 108-1-1 and FEMA Directive 108-1-1 as authorized by DHS Instruction Manual 23- 01-001-01, Revision 1. Categorical Exclusions a4 (information gathering, data analysis and processing, information dissemination, review, interpretation, and development of documents) and a7 (commitment of resources, personnel, and funding to conduct audits, surveys, and data collection of a minimally intrusive nature) have been applied. 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. Please reference the enclosed REC for further information.
- Standard Conditions** – This project approval is subject to the enclosed *Standard Mitigation Grant Program (HMGP) Conditions*, amended August 2018. Please note that federal funds may be de-obligated for work that does not comply with these conditions.

If you have any questions, please contact Stephanie Stephens, Hazard Mitigation Assistance Specialist, by email Stephanie.Stephens@fema.dhs.gov, or phone (510) 627-7201.

Sincerely,

KATHRYN J LIPIECKI  Digitally signed by KATHRYN J LIPIECKI
Date: 2021.10.26 10:44:07 -07'00'

Kathryn Lipiecki
Director, Mitigation Division
FEMA Region 9

Enclosures (4):

Obligation Report - Supplement 1
Project Management Report
Record of Environmental Considerations (REC)
Standard Mitigation Grant (HMGP) Conditions

cc: Michelle Telfer, Manager, Coastal Unit, California Governor's Office of Emergency Services
Matt Medland, Grants Specialist, California Governor's Office of Emergency Services
Robert McCord, Chief, Hazard Mitigation Assistance Branch, FEMA Region 9

13:31

HAZARD MITIGATION GRANTS PROGRAM

Obligation Report w/ Signatures

Disaster No	FEMA Project No	Amendment No	State Application ID	Action No	Supplemental No	State	Recipient
5293	2 R	0	57	1	1	CA	Statewide

Subrecipient: Sonoma (County)

Project Title : Wildfire Adapted Sonoma County - Part 2

Subrecipient FIPS Code: 097-99097

Total Amount Previously Allocated	Total Amount Previously Obligated	Total Amount Pending Obligation	Total Amount Available for New Obligation
\$276,817.35	\$276,817.35	\$0.00	\$0.00

Project Amount	Subrecipient Management Cost Amount	Total Obligation	IFMIS Date	IFMIS Status	FY
\$276,817.35	\$0.00	\$276,817.35	09/30/2021	Accept	2021

Comments

Date: 09/29/2021 User Id: SSCOTT39

Comment: Approved funding for HMGP 5293-57-2R-Wildfire Adapted Sonoma County-Part 2, \$276,817.35.

Authorization

Preparer Name: STEVEN SCOTT

Preparation Date:

HMO Authorization Name: STEPHANIE STEPHENS

HMO Authorization Date:

KATHRYN J LIPIECKI

Digitally signed by KATHRYN J LIPIECKI
Date: 2021.10.26 10:44:57 -07'00'

Authorizing Official Signature_____
Authorizing Official Title_____
Authorization Date_____
Authorizing Official Signature_____
Authorizing Official Title_____
Authorization Date

HAZARD MITIGATION GRANT PROGRAM

Project Management Report

Disaster Number	FEMA Project Number	Amendment Number	App ID	State	Recipient
5293	2-R	0	57	CA	Statewide

Subrecipient: Sonoma (County)

FIPS Code: 097-99097

Project Title : Wildfire Adapted Sonoma County - Part 2

Mitigation Project Description

Amendment Status : Approved

Approval Status: Approved

Project Title : Wildfire Adapted Sonoma County - Part 2

Recipient : Statewide

Subrecipient : Sonoma (County)

Recipient County Name : Sonoma

Subrecipient County Name : Sonoma

Recipient County Code : 97

Subrecipient County Code : 97

Recipient Place Name : Sonoma (County)

Subrecipient Place Name : Sonoma (County)

Recipient Place Code : 0

Subrecipient Place Code : 99097

Project Closeout Date : 00/00/0000

Work Schedule Status

Amend #	Description	Time Frame	Due Date	Revised Date	Completion Date
0	Public outreach to promote project activities	9m	00/00/0000	00/00/0000	00/00/0000
0	Defensible Space Assessments and Reports	6m	00/00/0000	00/00/0000	00/00/0000
0	IR Construction Assessment and Property Reports	5m	00/00/0000	00/00/0000	00/00/0000
0	Engineered Designs or typical drawings	2m	00/00/0000	00/00/0000	00/00/0000
0	Project Specific County Permit Program	2m	00/00/0000	00/00/0000	00/00/0000
0	Environmental Compliance	2m	00/00/0000	00/00/0000	00/00/0000
0	I Specific Detail, Revised BCA and Phase I Close-Out	3m	00/00/0000	00/00/0000	00/00/0000
0	Defensible space implementation carried out by program coordinator	7m	00/00/0000	00/00/0000	00/00/0000
0	Post-treatment inspection	3m	00/00/0000	00/00/0000	00/00/0000
0	Fire retrofits and fire retrofits implementation. Property owners will directly engage in fire retrofits	6m	00/00/0000	00/00/0000	00/00/0000
0	WUI retrofit inspection and as-built plans	3m	00/00/0000	00/00/0000	00/00/0000
0	Closeout procedures required by 44 CFR 206.438(d) & FEMA	4m	00/00/0000	00/00/0000	00/00/0000

Approved Amounts

Total Approved Net Eligible	Federal Share Percent	Total Approved Federal Share Amount	Non-Federal Share Percent	Total Approved Non-Fed Share Amount
\$369,089.80	75.000000000	\$276,817.35	25.000000000	\$92,272.45

Allocations

Allocation Number	IFMIS Status	IFMIS Date	Submission Date	FY	ES/DFSC Support Req In	ES/DFSC Amend Nr	Proj Alloc Amount Fed Share	Subrecipient Management Cost	Total Alloc Amount
2	A	09/29/2021	09/29/2021	2021	3520083	1	\$276,817.35	\$0.00	\$276,817.35
Total							\$276,817.35	\$0.00	\$276,817.35

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Project Management Report

Disaster Number	FEMA Project Number	Amendment Number	App ID	State	Recipient
5293	2-R	0	57	CA	Statewide

Subrecipient: Sonoma (County)

FIPS Code: 097-99097

Project Title : Wildfire Adapted Sonoma County - Part 2

Obligations

Action Nr	IFMIS Status	IFMIS Date	Submission Date	FY	SFS Support Req ID	SFS Amend Number	Suppl Nr	Project Obligated Amt - Fed Share	Subrecipient Management Cost	Total Obligated Amount
1	A	09/30/202	09/29/2021	2021	4674959	0	1	\$276,817.35	\$0.00	\$276,817.35
Total								\$276,817.35	\$0.00	\$276,817.35

RECORD OF ENVIRONMENTAL CONSIDERATION (REC)

Project HMGP 5293-57-02 (Phase 1)

Title: Sonoma County Wildfire Adapted Part 2 (Phase 1)

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 Sonoma County proposes, under Phase 1, to provide targeted information to property owners and residents about proven methods to create defensible space around the home and reduce structural vulnerabilities that can lead to home ignition. Educational outreach will include a combination of print materials, social media outreach, and virtual community meetings. In addition to increasing awareness of fire-adapted principles, outreach will also focus on having local communities create Fire Safe Councils or become Firewise Communities. Permit Sonoma will inspect every accessible structure in identified project areas. Inspection reports with specific requirements and recommendations for complying with defensible space standards will be delivered to the homeowners. Voluntary WUI building inspections will be comprehensive, identifying any vulnerabilities identified in the county building code as well as recommendations based on current research on home ignitions. Phase 2 would include the implementation of defensible space activities at 500 selected homes, and ignition resistant construction to 250 selected homes within the identified project boundaries, and these locations will be reviewed once available. Phase 1 activities would involve evaluation and design development activities. No ground disturbance or other physical project construction activities are proposed.

Phase 1 of this project has been determined to be Categorical Excluded from the need to prepare either an Environmental Assessment or an Environmental Impact Statement in accordance with FEMA Instruction 108-1-1 and FEMA Directive 108-1-1 as authorized by DHS Instruction Manual 023-01-001-01, Revision 1. Categorical Exclusion A4 (information gathering, data analysis and processing, information dissemination, review, interpretation, and development of documents) has been applied. 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. - dcohen3 - 08/18/2021 21:30:59 GMT

CATEX CATEGORIES

Catex Category Code	Description	Selected
a4	(a4) Information gathering, data analysis and processing, information dissemination, review, interpretation, and development of documents. If any of these activities result in proposals for further action, those proposals must be covered by an appropriate CATEX. Examples include but are not limited to: (a) Document mailings, publication and distribution, training and information programs, historical and cultural demonstrations, and public affairs actions. (b) Studies, reports, proposals, analyses, literature reviews; computer modeling; and non-intrusive intelligence gathering activities.	Yes

EXTRAORDINARY

Extraordinary Circumstance Code	Description	Selected ?
	No Extraordinary Circumstances were selected	

ENVIRONMENTAL LAW / EXECUTIVE ORDER

RECORD OF ENVIRONMENTAL CONSIDERATION (REC)

Project HMGP 5293-57-02 (Phase 1)

Title: Sonoma County Wildfire Adapted Part 2 (Phase 1)

Environmental Law/ Executive Order	Status	Description	Comment
Clean Air Act (CAA)	Completed	Project will not result in permanent air emissions - Review concluded	
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	Phase 1 administration actions only and project locations will be reviewed once they have been identified for Phase 2 review. - dcohen3 - 08/18/2021 21:23:29 GMT
Executive Order 11990 - Wetlands	Completed	No effects on wetlands and project outside wetlands - Review concluded	Phase 1 administration actions only and project locations will be reviewed once they have been identified for Phase 2 review. - dcohen3 - 08/18/2021 21:23:41 GMT
Executive Order 12898 - Environmental Justice for Low Income and Minority Populations	Completed	Low income or minority population in or near project area	
	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	The proposed action is to provide funding to the subrecipient for Phase 1 development actions, without any proposed physical disturbance. These actions would result in no impacts to endangered species. ESA review will need to be completed prior to implementing any subsequent phases of the project. The proposed scope of work for design development will not destroy or adversely modify suitable habitat and will not affect any other listed or proposed species. It is therefore determined the proposed action would have No Effect on listed species and consultation with the Services under Section 7 of the Endangered Species Act is not required. - dcohen3 - 08/18/2021 21:26:11 GMT
	Completed	No effect to species or designated critical habitat (See comments for justification) - Review concluded	

RECORD OF ENVIRONMENTAL CONSIDERATION (REC)

Project HMGP 5293-57-02 (Phase 1)

Title: Sonoma County Wildfire Adapted Part 2 (Phase 1)

Environmental Law/ Executive Order	Status	Description	Comment
Farmland Protection Policy Act (FPPA)	Completed	Project does not affect designated prime or unique farmland - Review concluded	
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	Not type of activity with potential to affect historic properties - Review concluded	The Undertaking complies with Stipulation I.A.7.f. (assistance provided for planning, studies, design and engineering costs that involve no commitment of resources other than staffing and associated funding) of the Programmatic Agreement among the Federal Emergency Management Agency (FEMA), State Historic Preservation Office (SHPO) and California Office of Emergency Services (Cal OES), signed October 29, 2019. Thus, the Undertaking does not require SHPO review, and FEMA has no further Section 106 responsibilities in accordance with 36 CFR § 800.3(a)(1). No ground disturbance is proposed. - dcohen3 - 08/18/2021 21:24:44 GMT
Wild and Scenic Rivers Act (WSR)	Completed	Project is not along and does not affect Wild and Scenic River - Review concluded	

CONDITIONS

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RECORD OF ENVIRONMENTAL CONSIDERATION (REC)

Project HMGP 5293-57-02 (Phase 1)

Title: Sonoma County Wildfire Adapted Part 2 (Phase 1)

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.

Standard Mitigation Grant Program (HMGP) Conditions

FEMA Region IX, August, 2018

The following list applies to Recipients and Subrecipients accepting HMGP funds from the Federal Emergency Management Agency (FEMA) of the Department of Homeland Security (DHS):

1. **Applicable Federal, State, and Local Laws and Regulations.** The Recipient/Subrecipient must comply with all applicable Federal, State, and Local laws and regulations, regardless of whether they are on this list or other project documents. DHS financial assistance Recipients and Subrecipients are required to follow the provisions of the State HMGP Administrative Plan, applicable Hazard Mitigation Assistance Uniform Guidance, and Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards located in Title 2 of the Code of Federal Regulations (CFR) Part 200, adopted by DHS in 2 CFR 3002.
2. **Financial Management Systems.** The Recipient and Subrecipient must maintain financial management systems to account for and track funds, as referenced in 2 CFR 200.302.
3. **Match or Cost Share.** Non-federal match or cost share must comply with 2 CFR 200.306, the scope of work (SOW), and any agreements among the Subrecipient, the Recipient, and FEMA.
4. **Budget Changes.** Unanticipated adjustments are permitted within the approved total cost. However, if costs exceed the federal share, the Subrecipient must notify the Governor's Authorized Representative (GAR) of overruns before implementation. The GAR shall submit a written request for approval to FEMA Region IX. The subaward must continue to meet HMGP requirements, including cost effectiveness and cost share. Refer to 2 CFR 200.308 for additional information.
5. **Real Property and Land.** The acquisition, use, and disposition must comply with 2 CFR 200.311.
6. **Equipment.** The acquisition, use, and disposition must comply with 2 CFR 200.313.
7. **Supplies.** Upon project completion, FEMA must be compensated for unused supplies, exceeding \$5,000 (fair market value), and not needed for other federal programs. Refer to 2 CFR 200.314.
8. **Procurement.** Procurement procedures must be in conformance with 2 CFR 200.318-320.
9. **Monitoring and Reporting Program Performance.** The Recipient and Subrecipient must submit quarterly progress reports, as referenced in the 2 CFR 200.328 and State HMGP Administrative Plan.
10. **Records Retention.** In accordance with 2 CFR 200.333, financial/ programmatic records related to expenditures must be maintained at least 3 years after the date of Recipient's final expenditure report.
11. **Enforcement and Termination.** If the Recipient or Subrecipient fails to comply with the award or subaward terms, whether stated in a Federal statute or regulation, the State HMGP Administrative Plan, subpplication, a notice of award, an assurance, or elsewhere, FEMA may take one or more of the actions outlined in 2 CFR 200.338, including termination or partial termination of the award or subaward outlined in 2 CFR 200.339.
12. **Allowable Costs.** Funds are to be used for allowable costs in compliance with 2 CFR 200.403, the approved SOW, and any agreements among the Subrecipient, Recipient, and FEMA.

13. **Non-Federal Audit.** The Recipient and Subrecipient are responsible for obtaining audits in accordance with the Single Audit Act of 1984, in compliance with 2 CFR 200.501.
14. **Debarred and Suspended Parties.** Recipients and Subrecipients are subject to the non-procurement debarment and suspension regulations implementing Executive Orders 12549 and 12689, and 2 CFR 180. These regulations restrict federal financial assistance awards, subawards, and contracts with parties that are debarred, suspended, or otherwise excluded from or ineligible for participation in the federal assistance programs or activities.
15. **Equipment Rates.** Rates claimed for use of Subrecipient-owned equipment in excess of the FEMA-approved rates must be approved under State guidelines issued by the State Comptroller's Office or must be certified by the Recipient to include only those costs attributable to equipment usage less any fixed overhead and/or profit.
16. **Duplication of Funding between Public Assistance (PA) and HMGP.** Funding for PA Section 406 and HMGP Section 404 are permitted on the same facility/location, but the activities identified under each program must be distinct with separately accounted funds. At closeout, FEMA may adjust the funding to ensure the Subrecipient was reimbursed for eligible work from only one funding source.
17. **Historic Properties and Cultural Resources.** In compliance with 2 CFR 800, if a potential historic property or cultural resource is discovered during construction, the Subrecipient must cease work in the area and take all reasonable measures to avoid or minimize harm to the discovered property/resource. During construction, the Subrecipient will monitor ground disturbance activity, and if any potential archeological resources are discovered, will immediately cease work in that area, and notify the Recipient and FEMA. Construction in the area may resume with FEMA's written approval after FEMA's consultation, if applicable, with the State Historic Preservation Officer (SHPO).
18. **NEPA and Changes to the Scope of Work (SOW).** To comply with the National Environmental Policy Act (NEPA), and other Laws and Executive Orders, any change to the approved SOW shall be re-evaluated before implementation. Construction associated with a SOW change, prior to FEMA approval, may be ineligible for funding. Acceptance of federal funding requires environmental permits and clearances in compliance with all appropriate federal, state and local laws, and failure to comply may jeopardize funding.

Within their authority, the Recipient and Subrecipient must use of all practicable means, consistent with other essential policies, to create and maintain productive harmony for people and nature, and fulfill the social, economic, and other needs of present and future generations of Americans.