

# **Appendix E**

USFWS IPaC Report



## United States Department of the Interior



FISH AND WILDLIFE SERVICE  
Caribbean Ecological Services Field Office  
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In Reply Refer To:

08/18/2025 15:54:44 UTC

Project Code: 2025-0137082

Project Name: FEMA Education Infrastructure

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

**\*THE FOLLOWING SPECIES LIST IS NOT A SECTION 7 CONSULTATION. PLEASE CONTACT OUR OFFICE TO COMPLETE THE CONSULTATION PROCESS\***

The purpose of the Endangered Species Act (Act) is to provide a means whereby threatened, and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 et seq.), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect those species and/or their designated critical habitat.

Federal agencies are required to "request of the Secretary of Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action". The enclosed species list provides information to assist with the U.S. Fish and Wildlife Service (Service) consultation process under section 7 of the Act. However, **the enclosed species list does not complete the required consultation process**. The species list identifies threatened, endangered, proposed and candidate species, as well as proposed and designated critical habitats, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. A discussion between the Federal agency and the Service should include what types of listed species may occur in the proposed action area and what effect the proposed action may have on those species. This process initiates informal consultation.

Once a species list is obtained for the proposed project, an effect determination for endangered and threatened species should be made. The applicant could make an effect determination by using available keys on IPaC for specific species. For species with no determination keys, the applicant should request concurrence from the Service by sending a project package

to [caribbean\\_es@fws.gov](mailto:caribbean_es@fws.gov). To obtain guidance for completing this process and the minimum requirements for project packages, please visit:

<https://www.fws.gov/sites/default/files/documents/consultation-under-section-7-of-the-endangered-species-act-with-the-caribbean-ecological%20Services-field-office-template-letter.pdf>

When a federal agency, after discussions with the Service, determines that the proposed action is not likely to adversely affect any listed species, or adversely modify any designated critical habitat, and the Service concurs, the informal consultation is complete, and the proposed project moves ahead. If the proposed action is suspected to affect a listed species or modify designated critical habitat, the Federal agency may then prepare a Biological Assessment (B.A.) to assist in its determination of the project's effects on species and their habitat. However, a B.A. is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2) (c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a B.A. where the agency provides the Service with an evaluation on the likely effects of the action to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a B.A. are described at 50 CFR 402.12.

If a federal agency determines, based on its B.A. or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to further consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species, and proposed critical habitat be addressed within the consultation process. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf>

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species.

This list is provided pursuant to Section 7 of the Endangered Species Act and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action". Please use this list to determine whether your project requires consultation and to make your effects determination. For more guidance, use the Guideline for Consultation under Section 7 of the Endangered Species Act with the Caribbean Ecological Services Field Office by clicking [here](#).

This species list is provided by:

Caribbean Ecological Services Field Office

[caribbean\\_es@fws.gov](mailto:caribbean_es@fws.gov)

Post Office Box 491

Boqueron, PR 00622-0491

(786) 244-0081

Attachment(s):

- Official Species List
- USFWS National Wildlife Refuges and Fish Hatcheries
- Bald & Golden Eagles
- Migratory Birds
- Marine Mammals
- Coastal Barriers
- Wetlands

## OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

**Caribbean Ecological Services Field Office**

Post Office Box 491

Boqueron, PR 622-0491

(939) 320-3135

## PROJECT SUMMARY

Project Code: 2025-0137082  
Project Name: FEMA Education Infrastructure  
Project Type: Disaster-related Grants  
Project Description: Programmatic Environmental Assessment for Education Infrastructure Improvements.

### Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@17.876664849999997,-64.69612180125486,14z>



Counties: St. Croix , St. John , and St. Thomas counties, Virgin Islands

## ENDANGERED SPECIES ACT SPECIES

There is a total of 15 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries<sup>1</sup>, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

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1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

## MAMMALS

NAME	STATUS
West Indian Manatee <i>Trichechus manatus</i> There is <b>final</b> critical habitat for this species. Your location does not overlap the critical habitat. <b><i>This species is also protected by the Marine Mammal Protection Act, and may have additional consultation requirements.</i></b> Species profile: <a href="https://ecos.fws.gov/ecp/species/4469">https://ecos.fws.gov/ecp/species/4469</a> General project design guidelines: <a href="https://ipac.ecosphere.fws.gov/project/QUAFVLBRTZAERMSDAYJ2GHLNQU/documents/generated/7138.pdf">https://ipac.ecosphere.fws.gov/project/QUAFVLBRTZAERMSDAYJ2GHLNQU/documents/generated/7138.pdf</a>	Threatened

## BIRDS

NAME	STATUS
Black-capped Petrel <i>Pterodroma hasitata</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/4748">https://ecos.fws.gov/ecp/species/4748</a>	Endangered
Roseate Tern <i>Sterna dougallii dougallii</i> Population: Western Hemisphere except NE U.S. No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/2083">https://ecos.fws.gov/ecp/species/2083</a>	Threatened

## REPTILES

NAME	STATUS
Green Sea Turtle <i>Chelonia mydas</i> Population: South Atlantic DPS There is <b>proposed</b> critical habitat for this species. Your location overlaps the critical habitat. Species profile: <a href="https://ecos.fws.gov/ecp/species/6199">https://ecos.fws.gov/ecp/species/6199</a> General project design guidelines: <a href="https://ipac.ecosphere.fws.gov/project/QUAFVLBRTZAERMSDAYJ2GHLNQU/documents/generated/7134.pdf">https://ipac.ecosphere.fws.gov/project/QUAFVLBRTZAERMSDAYJ2GHLNQU/documents/generated/7134.pdf</a>	Threatened
Hawksbill Sea Turtle <i>Eretmochelys imbricata</i> There is <b>final</b> critical habitat for this species. Your location does not overlap the critical habitat. Species profile: <a href="https://ecos.fws.gov/ecp/species/3656">https://ecos.fws.gov/ecp/species/3656</a> General project design guidelines: <a href="https://ipac.ecosphere.fws.gov/project/QUAFVLBRTZAERMSDAYJ2GHLNQU/documents/generated/7131.pdf">https://ipac.ecosphere.fws.gov/project/QUAFVLBRTZAERMSDAYJ2GHLNQU/documents/generated/7131.pdf</a>	Endangered
Leatherback Sea Turtle <i>Dermochelys coriacea</i> There is <b>final</b> critical habitat for this species. Your location overlaps the critical habitat. Species profile: <a href="https://ecos.fws.gov/ecp/species/1493">https://ecos.fws.gov/ecp/species/1493</a> General project design guidelines: <a href="https://ipac.ecosphere.fws.gov/project/QUAFVLBRTZAERMSDAYJ2GHLNQU/documents/generated/7132.pdf">https://ipac.ecosphere.fws.gov/project/QUAFVLBRTZAERMSDAYJ2GHLNQU/documents/generated/7132.pdf</a>	Endangered
St. Croix Ground Lizard <i>Ameiva polops</i>	Endangered

NAME	STATUS
There is <b>final</b> critical habitat for this species. Your location overlaps the critical habitat. Species profile: <a href="https://ecos.fws.gov/ecp/species/5154">https://ecos.fws.gov/ecp/species/5154</a>	
Virgin Islands Tree Boa <i>Chilabothrus granti</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/3247">https://ecos.fws.gov/ecp/species/3247</a> General project design guidelines: <a href="https://ipac.ecosphere.fws.gov/project/QUAFVLBRTZAERMSDAYJ2GHLNQU/documents/generated/7141.pdf">https://ipac.ecosphere.fws.gov/project/QUAFVLBRTZAERMSDAYJ2GHLNQU/documents/generated/7141.pdf</a>	Endangered

## FLOWERING PLANTS

NAME	STATUS
Agave eggersiana There is <b>final</b> critical habitat for this species. Your location overlaps the critical habitat. Species profile: <a href="https://ecos.fws.gov/ecp/species/7039">https://ecos.fws.gov/ecp/species/7039</a>	Endangered
Calyptanthes thomasiana No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/2743">https://ecos.fws.gov/ecp/species/2743</a>	Endangered
Catesbaea melanocarpa There is <b>final</b> critical habitat for this species. Your location overlaps the critical habitat. Species profile: <a href="https://ecos.fws.gov/ecp/species/722">https://ecos.fws.gov/ecp/species/722</a>	Endangered
Marron Bacora <i>Solanum conocarpum</i> Population: There is <b>final</b> critical habitat for this species. Your location overlaps the critical habitat. Species profile: <a href="https://ecos.fws.gov/ecp/species/2227">https://ecos.fws.gov/ecp/species/2227</a>	Endangered
St. Thomas Prickly-ash <i>Zanthoxylum thomasianum</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/102">https://ecos.fws.gov/ecp/species/102</a>	Endangered
Vahl's Boxwood <i>Buxus vahlii</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/4454">https://ecos.fws.gov/ecp/species/4454</a>	Endangered
Wheeler's Peperomia <i>Peperomia wheeleri</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/1463">https://ecos.fws.gov/ecp/species/1463</a>	Endangered

## CRITICAL HABITATS

There are 8 critical habitats wholly or partially within your project area under this office's jurisdiction.

NAME	STATUS
Agave eggersiana <a href="https://ecos.fws.gov/ecp/species/7039#crithab">https://ecos.fws.gov/ecp/species/7039#crithab</a>	Final

NAME	STATUS
Catesbaea melanocarpa <a href="https://ecos.fws.gov/ecp/species/722#crithab">https://ecos.fws.gov/ecp/species/722#crithab</a>	Final
Green Sea Turtle <i>Chelonia mydas</i> <a href="https://ecos.fws.gov/ecp/species/6199#crithab">https://ecos.fws.gov/ecp/species/6199#crithab</a>	Proposed
Leatherback Sea Turtle <i>Dermochelys coriacea</i> <a href="https://ecos.fws.gov/ecp/species/1493#crithab">https://ecos.fws.gov/ecp/species/1493#crithab</a>	Final
Lesser Virgin Islands Skink <i>Spondylurus semitaeniatus</i> For information on why this critical habitat appears for your project, even though Lesser Virgin Islands Skink is not on the list of potentially affected species at this location, contact the local field office.	Proposed
Marron Bacora <i>Solanum conocarpum</i> <a href="https://ecos.fws.gov/ecp/species/2227#crithab">https://ecos.fws.gov/ecp/species/2227#crithab</a>	Final
St. Croix Ground Lizard <i>Ameiva polops</i> <a href="https://ecos.fws.gov/ecp/species/5154#crithab">https://ecos.fws.gov/ecp/species/5154#crithab</a>	Final
Virgin Islands Bronze Skink <i>Spondylurus sloanii</i> For information on why this critical habitat appears for your project, even though Virgin Islands Bronze Skink is not on the list of potentially affected species at this location, contact the local field office.	Proposed

## USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

REFUGE INFORMATION WAS NOT AVAILABLE WHEN THIS SPECIES LIST WAS GENERATED. PLEASE CONTACT THE FIELD OFFICE FOR FURTHER INFORMATION.

## BALD & GOLDEN EAGLES

Bald and Golden Eagles are protected under the Bald and Golden Eagle Protection Act <sup>2</sup> and the Migratory Bird Treaty Act (MBTA) <sup>1</sup>. Any person or organization who plans or conducts activities that may result in impacts to Bald or Golden Eagles, or their habitats, should follow appropriate regulations and consider implementing appropriate avoidance and minimization measures, as described in the various links on this page.

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1. The [Bald and Golden Eagle Protection Act](#) of 1940.
  2. The [Migratory Birds Treaty Act](#) of 1918.
  3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

Bald and Golden Eagles are protected under the Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act (MBTA). Any person or organization who plans or conducts activities that may result in impacts to Bald or Golden Eagles, or their nests, should follow appropriate regulations and implement required avoidance and minimization measures, as described in the various links on this page.

The data in this location indicates that no eagles have been observed in this area. This does not mean eagles are not present in your project area, especially if the area is difficult to survey. Please review the 'Steps to Take When No Results Are Returned' section of the Supplemental Information on Migratory Birds and Eagles document to determine if your project is in a poorly surveyed area. If it is, you may need to rely on other resources to determine if eagles may be present (e.g. your local FWS field office, state surveys, your own surveys).

Any person or organization who plans or conducts activities that may result in impacts to bald or golden eagles, or their habitats, should follow appropriate regulations and consider implementing appropriate conservation measures, as described in the links below. Specifically, please review the "Supplemental Information on Migratory Birds and Eagles".

## MIGRATORY BIRDS

The Migratory Bird Treaty Act (MBTA) <sup>1</sup> prohibits the take (including killing, capturing, selling, trading, and transport) of protected migratory bird species without prior authorization by the Department of Interior U.S. Fish and Wildlife Service (Service).

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1. The [Migratory Birds Treaty Act](#) of 1918.
  2. The [Bald and Golden Eagle Protection Act](#) of 1940.
  3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

THERE ARE NO FWS MIGRATORY BIRDS OF CONCERN WITHIN THE VICINITY OF YOUR PROJECT AREA.

## COASTAL BARRIERS

Projects within the [John H. Chafee Coastal Barrier Resources System](#) (CBRS) may be subject to the restrictions on Federal expenditures and financial assistance and the consultation requirements of the Coastal Barrier Resources Act (CBRA) (16 U.S.C. 3501 et seq.). For more information, please contact the local [Ecological Services Field Office](#) or visit the [CBRA Consultations website](#). The CBRA website provides tools such as a flow chart to help determine whether consultation is required and a template to facilitate the consultation process.

## SYSTEM UNIT (SU)

Most new Federal expenditures and financial assistance, including Federal flood insurance, are prohibited within System Units. **Federally-funded projects within System Units require consultation with the Service.** Consultation is not required for projects using private, state, or local funds.

## OTHERWISE PROTECTED AREA (OPA)

OPAs are denoted with a "P" at the end of the unit number. The only prohibition within OPAs is on Federal flood insurance. **CBRA consultation is not required for projects within OPAs.** However, agencies providing disaster assistance that is contingent upon a requirement to purchase flood insurance after the fact are advised to disclose the OPA designation and information on the restrictions on Federal flood insurance to the recipient prior to the commitments of funds.

UNIT	NAME	TYPE	SYSTEM UNIT ESTABLISHMENT DATE	FLOOD INSURANCE PROHIBITION DATE
VI-01	Rust Up Twist	SU	11/16/1990	11/16/1990
VI-02	Salt River Bay	SU	11/16/1990	11/16/1990
VI-03	Altona Lagoon	SU	11/16/1990	11/16/1990
VI-04	Southgate Pond	SU	11/16/1990	11/16/1990
VI-05	Coakley Bay	SU	11/16/1990	11/16/1990
VI-06	Robin Bay	SU	11/16/1990	11/16/1990
VI-07	Great Pond	SU	11/16/1990	11/16/1990
VI-07	Great Pond	SU	2/24/1997	2/24/1997
VI-08	Canegarden Bay	SU	11/16/1990	11/16/1990
VI-09	Krause Lagoon	SU	11/16/1990	11/16/1990
VI-10	Long Point	SU	11/16/1990	11/16/1990
VI-11	Westend Saltpond	SU	11/16/1990	11/16/1990
VI-16	Newfound Bay	SU	11/16/1990	11/16/1990
VI-16	Newfound Bay	SU	11/15/1993	11/15/1993
VI-17	Pond Bay	SU	11/16/1990	11/16/1990
VI-18	Lagoon Point	SU	11/16/1990	11/16/1990
VI-25	Fish Bay	SU	11/16/1990	11/16/1990
VI-26	Sprat Point	SU	11/16/1990	11/16/1990
VI-27	Limestone Bay	SU	11/16/1990	11/16/1990

UNIT	NAME	TYPE	SYSTEM UNIT ESTABLISHMENT DATE	FLOOD INSURANCE PROHIBITION DATE
VI-28	Perseverance Bay	SU	11/16/1990	11/16/1990
VI-29	Magens Bay	SU	11/16/1990	11/16/1990
VI-30	Mandal Bay	SU	11/16/1990	11/16/1990
VI-31	Smith Bay	SU	11/16/1990	11/16/1990
VI-32	Vessup Bay	SU	11/16/1990	11/16/1990
VI-33	Great Bay	SU	11/16/1990	11/16/1990
VI-34	Jersey Bay	SU	11/16/1990	11/16/1990
VI-04P	Southgate Pond	OPA	N/A	11/16/1991
VI-11P	Westend Saltpond	OPA	N/A	11/16/1991
VI-12P	Cinnamon Bay	OPA	N/A	11/16/1991
VI-13P	Maho Bay	OPA	N/A	11/16/1991
VI-14P	Francis Bay	OPA	N/A	11/16/1991
VI-15P	Leinster Bay	OPA	N/A	11/16/1991
VI-19P	Ram Head	OPA	N/A	11/16/1991
VI-20P	Kiddel Bay	OPA	N/A	11/16/1991
VI-21P	Grootpan Bay	OPA	N/A	11/16/1991
VI-22P	Great Lameshur Bay	OPA	N/A	11/16/1991
VI-23P	Europa Bay	OPA	N/A	11/16/1991
VI-24P	Reef Bay	OPA	N/A	11/16/1991
VI-35P	Buck Island	OPA	N/A	11/16/1991

## MARINE MAMMALS

Marine mammals are protected under the [Marine Mammal Protection Act](#). Some are also protected under the Endangered Species Act<sup>1</sup> and the Convention on International Trade in Endangered Species of Wild Fauna and Flora<sup>2</sup>.

The responsibilities for the protection, conservation, and management of marine mammals are shared by the U.S. Fish and Wildlife Service [responsible for otters, walruses, polar bears, manatees, and dugongs] and NOAA Fisheries<sup>3</sup> [responsible for seals, sea lions, whales, dolphins, and porpoises]. Marine mammals under the responsibility of NOAA Fisheries are **not** shown on

this list; for additional information on those species please visit the [Marine Mammals](#) page of the NOAA Fisheries website.

The Marine Mammal Protection Act prohibits the take of marine mammals and further coordination may be necessary for project evaluation. Please contact the U.S. Fish and Wildlife Service Field Office shown.

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1. The [Endangered Species Act](#) (ESA) of 1973.
  2. The [Convention on International Trade in Endangered Species of Wild Fauna and Flora](#) (CITES) is a treaty to ensure that international trade in plants and animals does not threaten their survival in the wild.
  3. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

NAME

West Indian Manatee *Trichechus manatus*

Species profile: <https://ecos.fws.gov/ecp/species/4469>

## WETLANDS

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

### FRESHWATER FORESTED/SHRUB WETLAND

- PFO1Ch
- PSS1F
- PSS1Ch
- PSS1A
- PFO3C
- PSS1C
- PFO3A
- PFO1Ah
- PFO1C
- PSS3Cx

- PFO1A
- PFO3Ch
- PSS1Cx
- PSS3Ch

FRESHWATER POND

- PUSA
- PABHh
- PUBFx
- PUBF
- PUBFh
- PUBHh
- PUSCx
- PABHx
- PUBHx
- PUSAh
- PUSC
- PUSCh

RIVERINE

- R2UBFx
- R2UBHx
- R4SBCx
- R4SBC

ESTUARINE AND MARINE WETLAND

- E2USNx
- E2US3M
- M2RSM
- E2US2P
- E2SS5N
- M2RSN
- E2SS5P
- M2USP
- E2SS3N
- M2RFM
- M2USM
- E2USM
- E2US2M

- E2EM1P
- E2SS3N3
- M2RSP
- E2USN
- E2SS3Px
- E2AB1M
- E2RSN
- M2RFN
- M2RS1N
- M2RS2M
- E2SS3P
- E2SS5M
- M2US2P
- M2USN
- E2USP

ESTUARINE AND MARINE DEEPWATER

- M1RF1L
- E1UBL
- M1RFL
- M1UBL
- M1AB3L
- M1RBL
- M1AB1L
- E1AB3L
- M1UBLx
- E1UBLx

FRESHWATER EMERGENT WETLAND

- PEM1Ax
- PEM1Fx
- PEM1A
- PEM1F
- PEM1Cx
- PEM1Ah
- PEM1Fh
- PEM1/SS3A
- PEM1C

- PEM2Fx
- PEM1Ch

## **IPAC USER CONTACT INFORMATION**

Agency: Federal Emergency Management Agency

Name: Eric Hanson

Address: 120 South 6th Street, Suite 1710

City: Minneapolis

State: MN

Zip: 55402

Email: paleomanh2o@gmail.com

Phone: 3202488776

## **LEAD AGENCY CONTACT INFORMATION**

Lead Agency: Federal Emergency Management Agency

You have indicated that your project falls under or receives funding through the following special project authorities:

- BIPARTISAN INFRASTRUCTURE LAW (BIL) (OTHER)