



FEMA

DISASTER ASSISTANCE

FACT SHEET

9580.204

Validation of Hazardous Trees, Limbs, and Stumps

Overview

Removal of hazardous trees, limbs and stumps that present immediate threats to lives, public health and safety, or improved property and meet other eligibility criteria specified in FEMA's Debris Management Guide may be eligible for Public Assistance grant funding. Public Assistance applicants are required to monitor debris removal operations and provide documentation of work performed to support their requests for reimbursement from FEMA. This Fact Sheet provides guidance on documentation required to obtain Public Assistance funding for the removal of hazardous trees, limbs and stumps. In addition, it describes the process FEMA will use to validate the applicants' requests for reimbursement.

Documenting Hazardous Trees, Limbs, and Stumps

Applicants should provide the following documentation to support their requests for reimbursement for the removal of hazardous trees, limbs and stumps:

- Before and after photographs of hazardous trees, limbs, or stumps presenting an immediate threat. Photographs should capture the immediate threat to public right-of-way areas or improved property.
- GPS coordinates of each tree or stump and nearest street address establishing location
- Clear documentation of the immediate threat posed to public right of way areas or improved property and the scope of work required to remove the immediate threat. This includes documentation of labor (force account or contract), and equipment to perform the work.
 - Hazardous trees: document that the tree is cut flush to the ground.
 - Hazardous limbs: document the number of hazardous limbs, number of cuts per tree, and location of cuts for validation purposes (include the number of primary, secondary, and tertiary limbs).

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- Hazardous stumps: document the quantity of material required to fill the resultant hole.
- Measurements of hazardous trees, limbs and stumps:
 - Hazardous trees should be measured at diameter breast height. Hazardous trees must be six inches or greater in diameter to be eligible for Public Assistance funding.
 - Hazardous limbs should be measured at the point of break. Hazardous limbs must be greater than two inches in diameter to be eligible for Public Assistance funding.
 - Hazardous stumps should be measured 24 inches above the ground. Hazardous stumps must be greater than 24 inches in diameter to be eligible for per-stump unit cost reimbursement for removal.

This documentation is not required during the emergency debris clearance phase when crews are clearing roads and providing access to critical facilities.

Information on the eligibility of hazardous trees, limbs and stumps can be found in Part I of FEMA's Debris Management Guide and in Disaster Assistance Policies 9523.11, Hazardous Stump Extraction and Removal Eligibility, and 9523.13, Debris Removal from Private Property.

Validation of Claimed Work

Objective

FEMA will validate that the applicants actually performed the work for which they request reimbursement before it obligates final funding for the project. FEMA, the State and applicants will jointly select a representative sample of leaning trees, stumps and hanging limbs from load tickets or invoices and jointly visit each location stated on the load tickets or invoices to confirm that the requested work was completed in compliance with Public Assistance eligibility criteria. The percentage of the work that has been validated through this process may be applied to the specific scope of work invoiced by the debris removal contractor to determine eligible Public Assistance grant funding amounts.

FEMA, State, and Applicant Validation Team

The validation of work to remove hazardous trees, limbs and stumps should be a coordinated and collective effort between FEMA, the State, and the applicant. Validation teams performing physical inspections should be comprised of representatives from FEMA, the State, and the applicant who are familiar with debris removal operations, FEMA policy and debris removal eligibility, and debris monitoring documentation practices. The validation teams should work to achieve consensus on validation determinations.

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To validate hazardous limbs, the team may consist of tree professionals who will climb the trees or use bucket trucks to verify the number of limbs claimed. Hazardous limb validations can also be made from the ground if the limbs are clearly visible from the ground.

Validation Samples

FEMA, the State, and the applicant will select a random sample of 20 percent of the items of work to be validated. Separate validations should be conducted for hazardous trees, limbs, and stumps and for work performed on public and private property. Only one validation should be conducted for each scope of work selected for validation.

Interim Validations

Interim validations may be conducted before the completion of the debris removal operation as a quality control measure and to establish Public Assistance grant amounts for the applicable scope of work. Interim validations should sample 20 percent of the scope of work selected for validation. The results from each validation conducted will apply exclusively to the scope of work that each validation represents. For example, an interim validation may occur 30 days after a debris operation is initiated, and a final validation may be conducted after the debris removal operation is completed. The results from the first validation will be used to determine the eligible scope of work for work claimed during the first 30 days, and the final validation results will be applied to determine the eligible scope of work for the remaining work claimed.

If multiple validations are conducted and represent less than 20 percent of final amount of work invoiced for a particular item of work, a final validation should be conducted to bring the validation coverage to at least 20 percent of the invoiced work.

Documentation Requirements

Validation documentation should include the documentation required above as well as:

- names and affiliations of validation team members;
- date and locations of inspections;
- validation determinations and corresponding debris removal load tickets or invoices; and
- name of the debris removal contractor that performed the work.

Validations performed on private property should also document that all required access permissions, including Rights of Entries, have been obtained.

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Threshold for 100 Percent Eligibility

A scope of work that is validated at over 80 percent may be deemed 100 percent eligible for Public Assistance grant funding.

Timeframe

FEMA, State, and Applicant validation teams should validate debris removal contractor work of hazardous trees, limbs, and stumps within 30 days of project completion. If validation is performed while debris removal work is ongoing, validation results and percentages will need to be reconciled with final invoiced amounts.

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Date