



**FEMA**

**Grant Programs Directorate Information Bulletin  
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**TO:** All State Administrative Agency Heads  
All State Administrative Agency Points of Contact  
All State Homeland Security Directors  
All State Emergency Management Agency Directors  
All Urban Areas Security Initiative Points of Contact  
All Tribal Nation Points of Contact  
All Public and Private Sector Port Security Partners  
All Private Sector Transportation Security Partners  
All Eligible Regional Transit Agencies

**FROM:** Elizabeth M. Harman  
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**SUBJECT:** Grant Programs Directorate Programmatic Environmental Assessment

This Information Bulletin (IB) is intended to provide grantees with information concerning the recently finalized Grant Programs Directorate's (GPD) Programmatic Environmental Assessment (PEA), and its impact on Environmental and Historic Preservation (EHP) compliance requirements. This IB augments IB #329 and provides further guidance on the GPD EHP review process.

**Programmatic Environmental Assessment Findings and Conclusions**

The PEA was developed in accordance with the National Environmental Policy Act of 1969 (NEPA) to examine the potential environmental impacts of projects that GPD grants typically fund across all programs. The PEA divides grant-funded projects into seven categories, planning, management and administration, training, exercises, purchase of mobile and portable equipment, modification of existing structures and facilities, and new construction, and defines those actions that have no environmental impacts, as well as those that require case-by-case consideration to accurately decide the appropriate level of analysis needed to determine environmental impacts.

**The following project types have been determined to have no environmental impacts; the PEA serves as the required EHP documentation for the following projects, and no further EHP documentation for these project types will be required.** The project type definitions do not supersede allowable activities or expenses listed in grant guidance for any given year.

*Planning:* The development of policies, plans, procedures, mutual aid agreements, strategies, and other publications that comply with relevant laws, regulations, and guidance and are necessary to perform assigned missions and tasks.

*Management and Administration (M&A):* The hiring of personnel; overtime and backfill expenses. Regular-time operational costs for existing positions that are assigned to full-time counterterrorism duties; development, revision, documentation, and/or distribution of regulations, directives, manuals, information bulletins, and other guidance documents; technical assistance activities that involve no resources other than manpower and/or funding; and other personnel, administrative, fiscal and management activities that involve no resources other than manpower and/or funding.

*Classroom-based Training:* All training conducted in a classroom setting to include the establishment, support, conducting, and attendance of classroom-based training. Training topics may include, but are not limited to, CBRNE, national security threats and catastrophic events, cyber/agriculture/food security, intelligence gathering and analysis, citizen and community preparedness, and training for volunteers.

*Table Top Exercises and Functional Exercises:* These include seminars, workshops, tabletop exercises, and games; these types are only hypothetical actions on the part of the participants, and are strictly notional. Functional exercises are a type of operations-based exercise that examine and/or validate the coordination, command, and control between various multi-agency coordination centers, such as emergency operation centers (EOCs) and joint field offices. A functional exercise does not involve any "boots on the ground", or first responders or emergency officials responding to an incident scenario in real time. All actions are simulated, but are communicated between participating EOCs and Command Posts through various forms of communication, including radio, telephone, and computer-based means such as WebEOC. Exercise scenarios may include CBRNE, cyber, agricultural, and natural or technological disasters. Any type of exercise that requires any type of ground disturbance or the building of temporary structures must still be sent for an EHP review.

*Mobile and Portable Equipment (no installation):* These are equipment devices that do not require any fixed installation and may be transported, such as hand-held radios, personal protective equipment (PPE), mobile/satellite phones, dive equipment, boats, response and mobile command vehicles, and other similar devices that do not require installation.

Grantees contemplating projects that involve the modification or renovation of existing structures and facilities, or that involve new construction, including replacement of facilities, must participate in the EHP review process by submitting supporting EHP documentation as appropriate to GPD for their evaluation to determine whether the proposed project has the potential to have impacts on environmental resources and/or historic properties. These documents are referred to as an EHP Review Packet. Please refer to IB 329.

FEMA will require grantees and subgrantees to follow standard mitigation measures, including best management practices (BMPs), described in Sections 7.1 and 7.2 of the PEA, to the extent practicable and applicable to avoid or minimize impacts to the environment. If grantees or subgrantees are unable to implement a project in a manner that avoids or minimizes impacts, a Site-Specific Environmental Assessment (SEA) may be required. An SEA is a concise document that analyzes any unique project-specific impacts that are not addressed in the PEA. An SEA may contain project-specific conditions that grantees/ subgrantees must comply with. Grantees/subgrantees are responsible for the preparation of SEAs, and may use grant funds.

Grantees contemplating training and exercises that fall into the categories of drills or full-scale exercises, as described in the PEA, will need to submit an EHP Review Packet. Examples are any type of explosive, chemical or fire scenario that is not executed at a facility that has been approved for such use. An EHP review packet will not need to be provided for those exercises that are planned to take place at approved facilities such as: fire and police academies, search and rescue training facilities, explosive testing centers etc.

The EHP Review Packet must be submitted to GPD by the direct recipient of Federal funds, as is indicated in the grant award documentation, via the Centralized Scheduling and Information Desk (CSID) at [askcsid@dhs.gov](mailto:askcsid@dhs.gov) prior to the initiation of the project. Preferred submission formats are those supported by Microsoft Office (.doc files) and Adobe Acrobat (.pdf files). JPEG is the preferred picture format, but other widely supported file types may be used. The subject heading of the submission e-mail must be in the following format:

EHP Submission: Project Name, Subgrantee Name; Grant Award Number (i.e., **EHP Submission: Camera Installation, Anytown Police Department, 2010-AB-C1-2345**)

**Grantees must receive written approval from GPD prior to project implementation for those projects that require submission of an EHP Review Packet.**

For questions about the status of your EHP Review Packet, or for any questions related to the EHP review process, please contact your Program Analyst or the GPD EHP Team via e-mail at [GPDEHPinfo@dhs.gov](mailto:GPDEHPinfo@dhs.gov).

Enclosures:

- (1) FONSI
- (2) GPD Final PEA 2010
- (3) IB 329
- (4) IB 329 Clarification