

FEMA and GPD's Environmental Planning & Historic Preservation Review

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FEMA and GPD

Environmental Planning & Historic Preservation

**What is Environmental Planning and
Historic Preservation (EHP)?**

Why EHP?

Benefits vs. Consequences

What We Need to Know

What We'd Like to Know

**EHP Process, Timelines,
& Extenuating Circumstances**

Online Resources and Contacts



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What Is an EHP Review?

- Analysis of pertinent project information to determine compliance with EHP laws, regulations, and executive orders
- All projects funded with Federal grant dollars must comply with EHP laws, regulations, and Executive Orders
- EHP review must be completed by FEMA/GPD before project initiation
- Grantees must provide all required EHP materials to GPD via the GPD EHP Inbox at GPDEHPinfo@fema.dhs.gov



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What Are EHP Considerations?

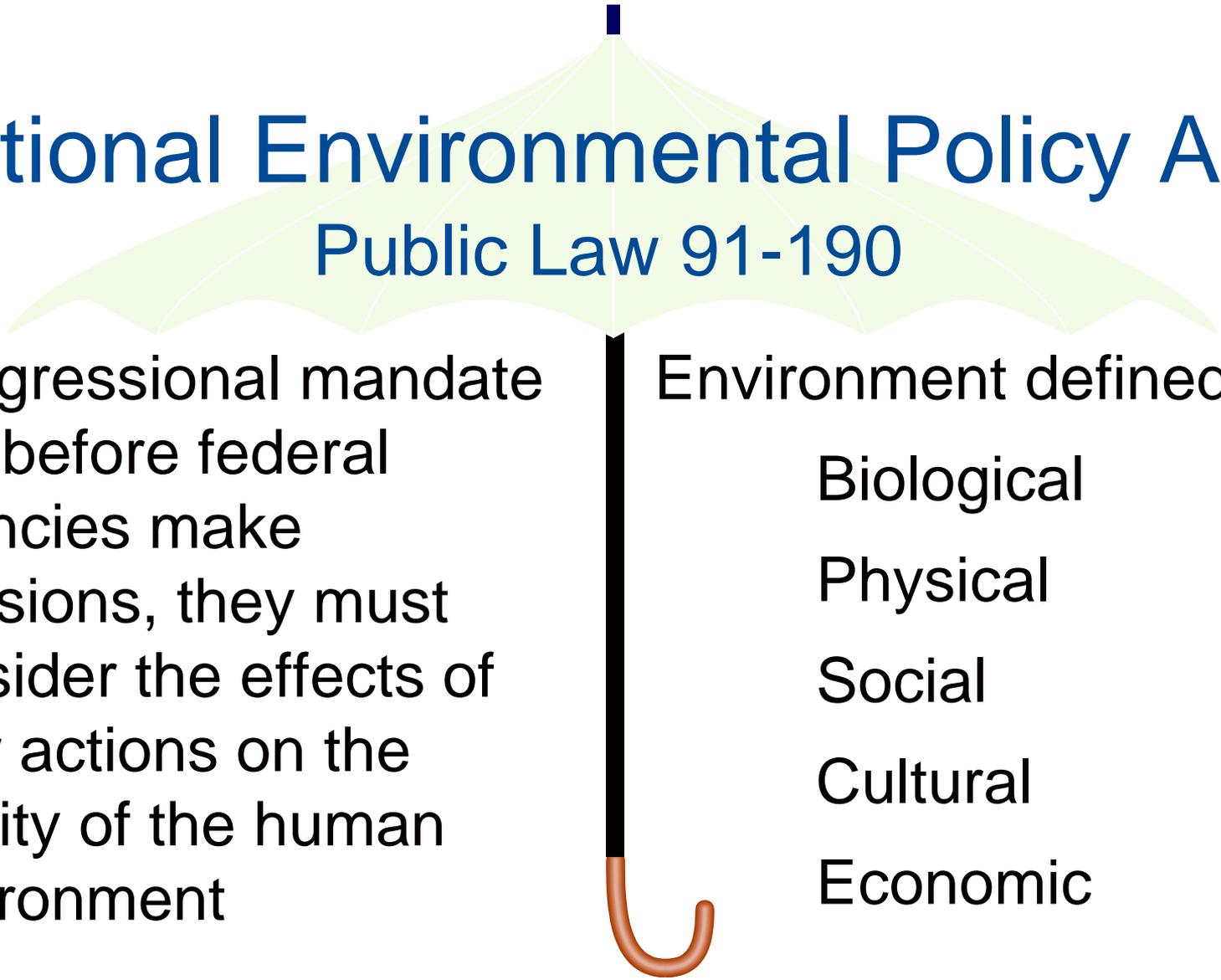
- Floodplains
- Wetlands
- Cultural Resources
 - Historic properties
 - Archaeological sites
- Endangered Species
- Air and Water Quality
- Noise
- Fish and Wildlife (including habitat)
- Coastal Zones
- Agricultural Lands



- Environmental Justice
- Socioeconomic Resources
- Land Use
- Hazardous Materials
- Traffic
- Geology (topography, soils)



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National Environmental Policy Act

Public Law 91-190

Congressional mandate that before federal agencies make decisions, they must consider the effects of their actions on the quality of the human environment

Environment defined:

Biological

Physical

Social

Cultural

Economic



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FEMA and GPD's EHP Review

It is FEMA's policy to integrate environmental and historic preservation considerations into its hazard mitigation, disaster planning, response and recovery, and emergency preparedness activities.



This is accomplished through FEMA's *Environmental Planning and Historic Preservation (EHP) Review process.*



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FEMA and GPD's EHP Review

EHP compliance for GPD-funded grant projects is GPD's responsibility, in collaboration with FEMA's Office of Environmental Planning and Historic Preservation and FEMA's Regional Environmental Offices



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EHP Laws and Executive Orders: Basis for FEMA EHP Review

Endangered Species Act

National Historic
Preservation Act

Executive Orders:
Environmental Justice
Seismic Retrofit
Floodplains
Wetlands

NEPA

Clean Air Act

Clean Water Act

Resource Conservation &
Recovery Act

Coastal Barrier
Resources Act
Coastal Zone
Management Act

FEMA's EHP Review

Is required by Federal laws, regulations and Executive Orders

Ensures FEMA actions, including grant-funded projects, are in compliance with EHP requirements

Must be complete before FEMA can fund any project



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FEMA's EHP Review

- Purpose of EHP Review is to ensure compliance - not to deny projects. Sometimes projects may need to be modified to minimize impacts.
- Costs of environmental review (e.g., archeological surveys, reports) are paid by grantee, and can be part of grant expenditures.
- Grantees must provide all required EHP materials to GPD via the GPD EHP Inbox at GPDEHPinfo@fema.dhs.gov



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FEMA's EHP Review

May require consultation with resource and regulatory agencies, including:

- **State Historic Preservation Office**
- **Tribal Government**
- **US Fish and Wildlife Service**
- **US Army Corps of Engineers**



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FEMA's EHP Review

May require preparation of written analyses or agreements required under EHP laws, including:

- **Environmental Assessment (NEPA)**
- **Biological Assessment (ESA)**
- **Memorandum of Agreement (NHPA)**

Some EHP laws and EOs require public involvement & a public comment period



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Preparedness Project Types that Trigger EHP Review

Facility construction

Modification/renovation of existing structures

Physical security enhancements

Communication towers



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FEMA's EHP Review

Benefits

- Informed decision-making
- Ensure compliance
- Protect community and Investment
- Protect our nation's water, air, coastal, fish and wildlife, agricultural, historical, and cultural resources, as well as to minimize potential adverse effects to children, low-income, and minority populations



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Consequences of Non-Compliance

- Project delays
- Denial/de-obligation of funding
- Negative publicity
- Civil penalties
- Lawsuits



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WHAT WE NEED TO KNOW

HELP US HELP YOU



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ENVIRONMENTAL and HISTORIC PRESERVATION SCREENING FORM

This memo should be attached to all project information sent to the Grant Programs Directorate (GPD) for an environmental and historic preservation (EHP) regulatory compliance review. Complete sections A – D of this memo, as applicable. When questions are not applicable to the project, leave the field blank. This memo is intended to be completed electronically. Refer to Appendix A (page 10) for guidance on how to make an aerial map (if required for your project), and refer to Appendix B (page 11) for a list of online resources to help you provide visual documentation. Contact GPD-EHP for a version of this memo that is suitable for printing and completing by hand. To check (X) a box, left double-click using your mouse and a Check Box Field Form Box will appear. On the Check Box Field Form Box, select the default value as Checked and press OK. To write in a text field (____), select the text field with your mouse and begin typing.

Your completed screening form with necessary attachments must be submitted to the Centralized Scheduling and Information Desk (CSID) at askcsid@dhs.gov with the following information in the subject line of the e-mail: EHP Submission: Project Name, Subgrantee Name; Grant Award Number (i.e., EHP Submission: Camera Installation, Anytown Courthouse, 2010-AB-C1-2345).

A. PROJECT INFORMATION

Grant Program Name: _____ DHS Grant Award Number: _____

Project Name: _____ Grant Fiscal Year: _____ (Provide if no award number is available)

- Project Type (Check all that apply):
- Physical security enhancements (i.e., installation of fencing, cameras, TWIC readers, bollards, motion detection systems, x-ray machines, lighting, etc.)
 - New installation/construction/renovation (i.e., emergency operations centers, docks, piers, security guard buildings, etc.)
 - Renovations/upgrades/modifications to structures 50 years old or older
 - Communication towers, related equipment, and equipment shelters
 - Other ground disturbing activities (i.e., trenching, excavation, etc.)
 - Training and exercises (specify whether classroom-based or field-based; field-based only require further information below) _____
 - Purchase of equipment (specify type, and whether mobile/ portable, or installation will be required) _____
 - Other (specify) _____

Grantee Name (SAA): _____ Sub grantee Name: _____

State: _____ County: _____ City: _____ Agency: _____

Dollar value of grant (optional): _____

B. PROJECT DESCRIPTION/LOCATION

The following information will be required in order to complete a review for each project type. If multiple "project types" describe the same project, [i.e., physical security enhancements AND renovations of structures 50 years old or older AND other ground disturbing activities], it is not necessary to repeat information; please make a note to refer back to the previous entry.

Enter Project Description: _____

The project description should contain a brief summary of what specific action is proposed, where it is proposed, and how it will be implemented.

Project Type: **Physical security enhancements (i.e., installation of fencing, cameras, TWIC readers, bollards, motion detection systems, x-ray machines, lighting, etc.)**

Project Location (physical project address or latitude/longitude of project location): _____

Year existing building(s) or structure(s) involved in the proposed project was built (Required): _____

Color site photos attached (Required)

Ground-level site photos (showing where installations are proposed): Yes No

Aerial photograph with project limits outlined and with the location of any proposed installations identified (refer to Appendix A for guidance): Yes No

Will ground disturbance be required?

Yes (provide total extent (depth, length, and width) _____) No

Has the ground been previously disturbed? Yes No

FEMA Flood Insurance Rate Map (FIRM), with project limits outlined Yes No

If yes, please describe the current disturbed condition of the area (i.e., parking lot, commercial development, etc.): _____

If no, include other visual documentation (see Appendix B for a list of online mapping resources):

Technical drawings/site plans (if available) Yes No

U.S. Fish and Wildlife Service, National Wetlands Inventory (NWI) Map, with project limits outlined Yes No

U.S. Department of Agriculture (USDA) Soil Survey Map, with project limits outlined Yes No

Will any equipment or structures need to be installed? Yes No

If yes, please explain how and where this installation is proposed to be done (include site-specific photographs, and attach additional pages, if needed): _____

Will the equipment use the existing infrastructure for electrical distribution systems?

Yes No

Are there any known structures or buildings that are 50 years old or older in the project area or immediate vicinity? (If yes, please provide the location of the structure(s), ground-level color photos of these structures, and identify their location(s) on the aerial map; see Appendix B for the web address of the National Register of Historic Places) Yes No

Is there any previously completed environmental documentation for this project (i.e., environmental assessment, wetland delineation, archaeological study)? Yes (please attach documentation) No

1. Scope of work (complete and accurate)

Bad

Install cameras in courthouse

Good

Install 4 Panasonic VT-5 video cameras on first floor of 1898 county courthouse. Cameras will be installed opposite exit doors, 2 feet below drop ceiling (see diagram for location, position, and height). Wiring will use existing conduits... etc.



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1. Scope of work (continued)

Bad

Build EOC

Good

Build 4 story, 6000 sq ft EOC on vacant lot, last used for farming. Slab on grade construction with 4 ft footers. See site plan. Site will be graded and an estimated two feet of soil removed. Utilities will be installed 2 feet below grade... etc.



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2. Location and Aerial Photo

Address

Latitude / Longitude

Aerial photo with location
marked

Example

1600 Pennsylvania Ave NW,
Washington, DC 20500

N 38.89770, W 77.03652



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3. Ground Level Photographs (with captions)

Bad



Good

North face



South face



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4. Year built (man-made)

Example 1

Construction began 1792, completed 1800

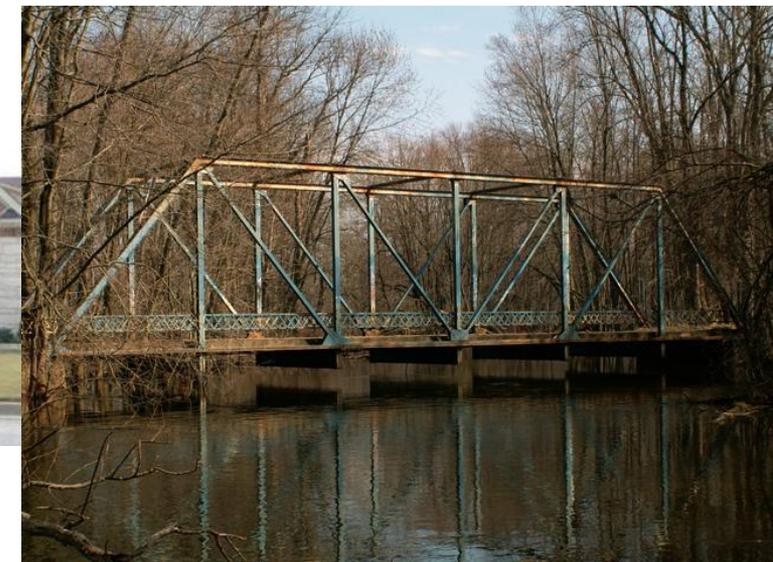
Rebuilt 1817, additions in 1824, 1829, 1901

Interior structural renovations 1927, 1946, 1948



Example 2

Built 2005



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5. Land Use (past, current, proposed)

Project area

Example:

Neighborhood

Logging until 1960, farmland 1960-1980, 2 story medical building with basement built 1981, demolished 1993, vacant lot currently.



Neighborhood mixed commercial / residential use



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6. Plans, drawings, blueprints



West face



East face



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7. Ground disturbance

Grading, removing, or digging into soil

Adding soil to site

If adding soil, where did the soil come from? e.g., commercial source, borrow pit, etc.

Example: length, width, and depth of trenching for conduit



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WHAT WE'D LIKE TO KNOW

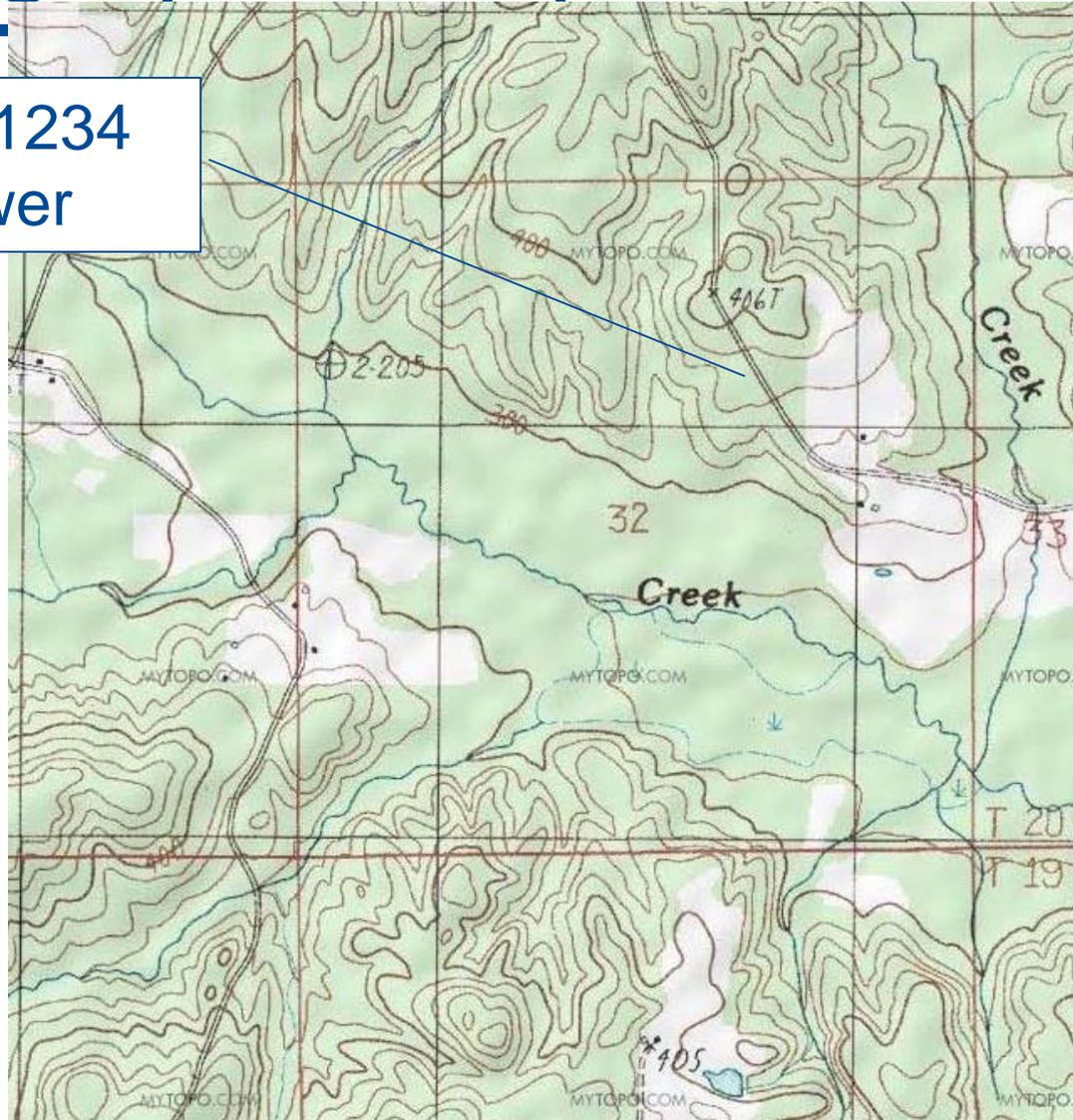
HELP EXPEDITE THE REVIEW



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1. Topographic Map

32.4567, -89.1234
Emeralda Tower



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2. Flood Insurance Rate Map



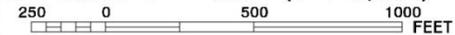
City of
Rocky Mount

270002



GRID NORTH

MAP SCALE 1" = 500' (1 : 6,000)



NFIP

PANEL 3840J

NATIONAL FLOOD INSURANCE PROGRAM

FIRM
FLOOD INSURANCE RATE MAP
NORTH CAROLINA

PANEL 3840

(SEE LOCATOR DIAGRAM OR MAP INDEX FOR FIRM
PANEL LAYOUT)

CONTAINS:

COMMUNITY	NUMBER	PANEL	SUFFIX
ROCKY MOUNT, CITY OF	370092	3840	J

Notice to User: The **Map Number** shown below should be used
when placing map orders; the **Community Number** shown
above should be used on insurance applications for the subject
community.

EFFECTIVE DATE
NOVEMBER 3, 2004

MAP NUMBER
3720384000J

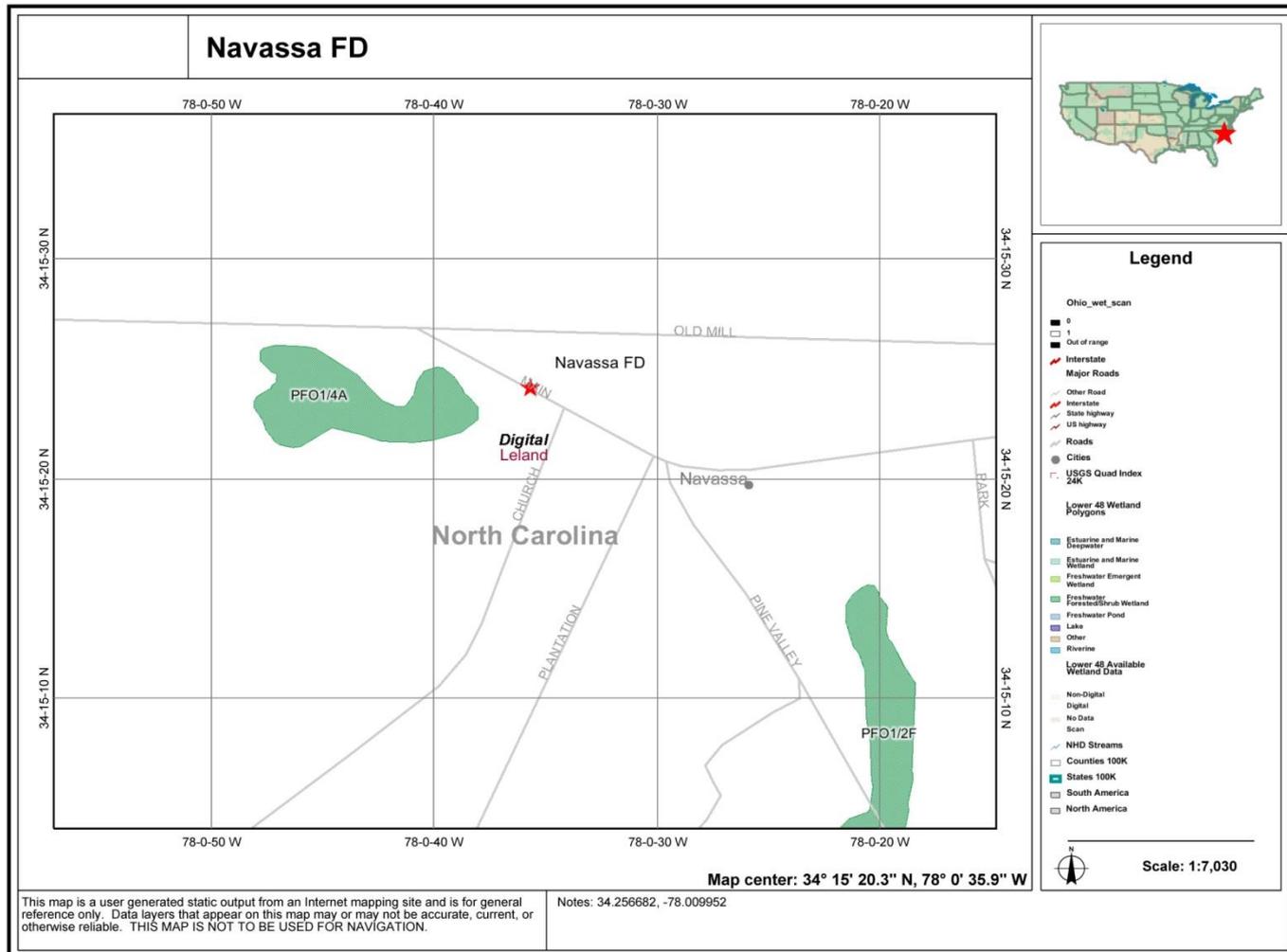


State of North Carolina
Federal Emergency Management Agency

This is an official copy of a portion of the above referenced flood map. It was extracted using F-MIT On-Line. This map does not reflect changes or amendments which may have been made subsequent to the date on the title block. For the latest product information about National Flood Insurance Program flood maps check the FEMA Flood Map Store at www.msc.fema.gov



3. Wetlands Map (National Wetlands Mapper)



4. Alternatives Considered

Ask yourself:

What is the purpose or need I am trying to meet with the proposed project?

Then ask:

What other ways may I meet that same purpose and need?

Hint: You've probably already thought this through



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5. Public Involvement (to date)

List any (and provide copies when applicable):

Public notices or letters of notification

Neighborhood or City Council meetings and minutes

Project-specific public meetings and minutes

Media coverage

Responses from the public



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6. Correspondence & Permits

Include:

Copy of letter initiating consultation

Copy of response letter

Additional emails, phone memos, or correspondence

Copies of permits already received or applied for

If not initiated yet, then tell us who you think you should be contacting or that we should contact



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7. Studies

Include:

Zoning studies

Geotechnical studies

Hydrology and Hydraulic (H&H) studies

Histories

Archaeological surveys

... etc.



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PROCESS, TIMELINES, & EXTENUATING CIRCUMSTANCES



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What to Expect with a GPD EHP Review

- Complete and submit EHP Screening Form and information to GPD EHP (send to GPDEHPinfo@fema.dhs.gov)
- Grantee will receive receipt confirmation email within 48 hours
- Grantee will receive project ID number within 5 to 10 business days



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What to Expect with a GPD EHP Review (Continued)

- GPD EHP reviews EHP packet. Notifies grantee if additional information is needed within 10 to 15 business days of initial receipt
- GPD EHP completes initial compliance review and makes a determination within 30 days of initial receipt.
- The outcome will be that the EHP Review is complete, or that it is being sent to a Regional Environmental Office for further review
- PA notified of GPD EHP review results



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Types of GPD EHP Project Reviews

- Type A Projects

- No potential for adverse EHP impact
- Classroom-based Training
- Purchase of Mobile and Portable Equipment
- Approved by Program Analyst

- Type B Projects

- Projects that will not result in adverse impacts on resources and that do not require additional consultation
- Installation of antennas, base radios, repeaters, and sirens, cameras, lighting, access control with little/no ground disturbance on buildings < 50 years old.
- Approved by FEMA GPD



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Types of GPD EHP Project Reviews (Cont.)

- Type C Projects

- Projects with Extraordinary Circumstances: NRHP-listed or eligible building, historic district, ground disturbance
- Communication towers
- New construction
- Approved by FEMA Regional Environmental Officer



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Common Reasons for EHP Delays

Incomplete information: request for more information = project delays

- Poor or absent ground-level photographs
- Inadequate project description
- Poor or absent aerial photographs
- Extent of ground disturbance unclear or not included
- No project location (physical addresses or latitude-longitude)



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Extenuating Circumstances

Section 106 (NHPA) consultation required (SHPO or Tribal response to request for consultation within 30 days, for complex projects consultation may take longer)

ESA formal consultation required (may take up to 135 days)

Environmental assessment is required

Memorandum of agreement is required



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Online Resources

- GPD EHP Screening Form
 - www.fema.gov/media-library/assets/documents/90195
- New GPD EHP Policy Document (replaces several Information Bulletins)
 - www.fema.gov/media-library/assets/documents/85376
- Information Bulletin No. 404 on EHP Expenditures
 - <http://www.fema.gov/media-library/assets/documents/104228>



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Contact Us

GPDEHPinfo@fema.dhs.gov

Pat Scida

GPD EHP Branch

202-786-9961

Pasquale.Scida@fema.dhs.gov



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