Environmental Planning and Historic Preservation (EHP) Compliance
Why is EHP Review Required?

- The National Environmental Policy Act of 1969 (NEPA) requires that the Federal government examine the proposed impacts of its actions before project implementation
  - This applies to grant-funded actions
  - NEPA does not mandate preservation, only informed decision-making
- State, local, or Tribal processes cannot replace NEPA compliance. However, materials prepared for other entities can be submitted with the EHP Review Packet for the Grant Programs Directorate (GPD)
- NEPA compliance has always been included in the special conditions of the grant award and the grant guidance
Environmental Laws and Executive Orders

EHP Laws and Executive Orders: The basis for FEMA's EHP Review

- Endangered Species Act
- National Historic Preservation Act
- Migratory Bird Treaty Act
- Clean Air Act
- Clean Water Act
- Farmland Protection Policy Act
- Executive Orders: Environmental Justice
- Floodplains
- Wetlands
- Coastal Barrier Resources Act
- Coastal Zone Management Act

NEPA - National Environmental Policy Act
What is an EHP Review?

- Analysis of pertinent project information to determine EHP compliance

- All projects funded with Federal grant dollars must comply with EHP laws, regulations, and Executive Orders and be certified by GPD

- Projects must receive EHP approval from GPD before initiation

- Grantees must provide all relevant EHP materials to GPD via the GPD EHP Inbox at GPDEHPinfo@fema.dhs.gov

- Grant funds may be used for preparation of EHP documentation
Type A, B & C Projects

- **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

- **Type C Projects**
  - Projects with Extraordinary Circumstances: NRHP-listed building, historic district, ground disturbance in a floodplain or wetland.
    - Communication towers
    - New construction
    - Approved by FEMA Regional Environmental Officer
EHP Review Packet

- EHP Screening Form
  - Basic project and grantee information
  - Detailed project description
  - Project location (physical address or latitude-longitude)
  - Extent (length, width, depth) of ground disturbance:
    - New construction and structure modification
    - Utility line placement
    - Fencing, light posts, installations, etc.
  - Age of structure on or adjacent to where equipment will be installed.
  - Labeled, color photographs (ground-level and aerial)
- For Type C Projects, additional documentation may be required.
Environmental Planning and Historic Preservation (EHP) Compliance Workshop

Case Study: Warehouse Security Enhancement
SECTION A. PROJECT INFORMATION

DHS Grant Award Number: 2008-PU-T8-0013
Grant Program: PSGP
Grantee: Hawaii Port Authority
  Grantee POC: Alice Billings
  Mailing Address: 89 Corporate Avenue, Honolulu, HI 78965
  E-mail: alice.billings@hpa.com
Sub-Grantee: Hawaii International Terminals, Inc.
  Sub-Grantee POC: Mary Stewart
  Mailing Address: 3 Oak Street, Honolulu, HI 78965
  E-mail: mary.stewart@hitinc.com
Estimated cost of project: $57,500
SECTION A. PROJECT INFORMATION

Project Title: Honolulu Marine Terminal Security Cameras, Warehouse #2

Location: Warehouse #2, South Aeolele Street, Honolulu, HI 96819

Project Description: This project is to install security upgrades for Warehouse #2 on South Aolele Street in Honolulu, HI. Six (6) panoramic cameras would be installed at the external corners of the warehouse to enhance security in and around the warehouse facility. An access control pad and an alarm would also be installed on an existing bollard located about 400 feet southeast of Warehouse #2. Several photographs are attached.
SECTION B. PROJECT TYPE

Please check ALL the block(s) that best fit the scope of the project.

☑ 1. Purchase of Equipment.
☐ 2. Training and exercises.
☑ 3. Renovations/upgrades/modifications or physical security enhancements to existing structures.
☐ 4. Generator installation.
☐ 5. New construction/addition.
☐ 6. Communication towers, antennas, and related equipment.
☐ 7. Other.
SECTION C. PROJECT TYPE DETAILS

1. **Purchase of equipment.** If the entire project is limited to purchase of mobile/portable equipment and there is no installation needed, this form does not need to be completed and submitted.

   a. Specify the equipment, and the quantity of each: Six (6) exterior CCTV cameras, access control pad, and an alarm.

   b. Provide the Authorized Equipment List (AEL) number(s) (if known): cameras: 04MD-01-VCAM; access control and alarm: 14SW-01-SNSR

   c. Complete Section D.
3. Renovations/upgrades/modifications, or physical security enhancements to existing structures.
   
   a. Complete Section D.
1. ☑ Project installation
   a. Explain how and where renovations/upgrades/modifications would take place or where equipment/systems would be installed: Six (6) exterior cameras would be mounted adjacent to existing light fixtures along the exterior walls of Warehouse Building #2. An access control pad and an alarm would also be installed on an existing bollard located about 400 feet southeast of Warehouse #2. Installing the control pad and alarm would require a 400-ft x 12-in x 16-in trench between the bollard and warehouse #2.
SECTION D. PROJECT DETAILS

1. ✓ Project installation

   b. Would ground disturbance be required to complete the project or training? ✓ Yes □ No

   • If Yes, provide total extent (depth, length, and width) of each ground-disturbing activity. Include both digging and trenching. For example, light poles and fencing have unique ground-disturbing activities (e.g., six light poles, 24” dia. x 4’ deep; trenching 12” x 500’ x 18" deep; 22 fence posts, 12” diameter x 3’ deep, and 2 gate posts, 18” diameter x 3’ deep): To install the underground utilities to serve the new access control panel and alarm electronics, a trench, (400-ft x 12-in x 16-in) would be dug from Warehouse #2 across the existing paved area. After installation of the utilities, the trench would be backfilled with gravel, compacted, and a new layer of asphalt applied.
SECTION D. PROJECT DETAILS

1. ✓ Project installation

   b. Would ground disturbance be required to complete the project or training?
      ✓ Yes □ No
      • If Yes, describe the current disturbed condition of the area (e.g., parking lot, road and right-of-way, commercial development):
        Industrial area. The area is paved.

   c. Would the equipment use the existing infrastructure for electrical distribution systems?
      ✓ Yes □ No
      • If No, describe power source and detail its installation at the site:
        N/A
SECTION D. PROJECT DETAILS

2. ✓ Age of structure/building at project site
   a. Provide the year existing building(s) or structure(s) on/in/nearest to the location involved in the proposed project was built: 1998
   • If the building or structure involved is over 45 years old and significant renovation, rehabilitation, or modification has occurred, provide the year(s) modified and briefly describe the nature of the modification(s): N/A
   b. Are there any structures or buildings that are 50 years old or older in or adjacent to the project area? □ Yes ✓ No
   • If yes, provide the location of the structure(s), ground-level color photographs of the structure(s), and identify their location(s) on an aerial map: N/A
SECTION D. PROJECT DETAILS

2. ☑ Age of structure/building at project site
   
   c. Is the project site listed in the National Register of Historic Places (National Register), or in/near a designated local or National Register Historic District? The internet address for the National Register is:
   http://nrhp.focus.nps.gov

   □ Yes  ☑ No

   • If Yes, identify the name of the historic property, site and/or district and the National Register document number:
     N/A
SECTION D. PROJECT DETAILS

3. ✓ Site photographs, maps, and drawings
   a. Attach site photographs. Site photographs are required for all projects. Use the following as a checklist for photographs of your project. Attach photographs to this document or as accompanying documents in your submission.
      - Labeled, color, ground-level photographs of the project site  Required
      - Labeled, color photograph of each location where equipment would be attached to a building or structure  Required
      - Labeled, color aerial photograph of the project site  Required
      - Labeled, color aerial photographs that show the extent of ground disturbance (if applicable)  Attached
      - Labeled, color ground-level color photographs of the structure from each exterior side of the building/structure (applicable only if building/structure is more than 45 years old)  N/A
   b. Are there technical drawings or site plans available?  □ Yes ✓ No
SECTION D. PROJECT DETAILS

4. □ Environmental documentation
   
a. Is there any previously completed environmental documentation for this project at this proposed project site (e.g., Environmental Assessment, or wetland delineation, or cultural/archaeological study)? □ Yes ☑ No
   
   • If Yes, attach documentation with this form □ Attached

b. Is there any previously completed agency coordination for this project (e.g., correspondence with the U.S. Fish and Wildlife Service, State Historic Preservation Office, Tribal Historic Preservation Office)? □ Yes ☑ No

   • If Yes, attach documentation with this form □ Attached
SECTION D. PROJECT DETAILS

4. ☐ Environmental documentation
   c. Was a NEPA document was prepared for this project?  ☐ Yes ☑ No
      • If Yes, what was the decision? (Check one, and please attach):
        ☐ Finding of No Significant Impact (FONSI) from an Environmental Assessment (EA) or
        ☐ Record of Decision (ROD) from an Environmental Impact Statement (EIS)
        Name of preparing agency:____________
        Date approved:____________
Ground-Level and Aerial Photographs

- Color, ground-level, and aerial photos should indicate the proposed locations for:
  - Equipment installations
  - Construction
  - Ground disturbance

- There are multiple online sources for aerial photos
  - Some are free sources, others request a nominal fee

- Using the tools such as line drawing and fill colors, label exactly where project features will take place

- Cut and paste completed drawing into Word document and include explanatory text

- Additional guidance for submitting photographs may be found in Appendix A of the EHP Screening Form
Aerial Photograph, Warehouse #2, Honolulu Port Authority

Aerial photograph, Warehouse #2, Hawaii Port Authority, South Aeolele Street, Honolulu, HI
21 19' 40.35" N,
157 54' 0.13" W.
Aerial Photograph, Warehouse #2  
Showing cameras #1 - #6

Arial photograph of Warehouse #2 showing locations of cameras #1 - #6.

Hawaii Port Authority, Honolulu, HI
Ground-level photograph, Warehouse #2
Showing cameras #1 - #4

Warehouse #2 looking northeast showing locations of cameras #1 - #4.

Hawaii Port Authority, Honolulu, HI
Ground-level photograph, Warehouse #2
Showing cameras #3 - #6

Warehouse #2 looking northwest showing locations of cameras #3 - #6.

Hawaii Port Authority, Honolulu, HI
Ground-level photograph, Warehouse #2, Close up showing placement of camera #3

Warehouse #2 Close up showing placement of camera #3.

Hawaii Port Authority, Honolulu, HI
Ground-level photograph, Warehouse #2
Installation of access control pad and alarm

Trenching to provide electricity to access control pad and alarms

Keypad & alarm

Trenching
Aerial Photograph, Warehouse #2
Showing proposed ground disturbance

Aerial photograph, Warehouse #2, Hawaii Port Authority, South Aeolele Street, Honolulu, HI
21° 19' 40.35" N, 157° 54' 0.13" W.

Proposed trench for wiring for the control pad and alarm attached to a bollard.
Common Reasons for EHP Delays

- Poor or absent ground-level photographs
- Inadequate project description
- Poor or absent aerial photographs
- Extent of ground disturbance
- No project location (physical addresses or latitude-longitude)
Regional EHP Review Process

- REHP Office receives notification from H/Q to begin EHP review
- REHP reviews documentation for completeness
- If data is missing, REHP contacts H/Q to get necessary data from grantee
- Once all data is received, REHP begins consultation/coordination
- Upon completion of consultation, REHP finishes review and notifies H/Q
  review has been completed and has cleared the EHP queue
General Regional EHP Review Timeline

These timelines assume that the Region is provided all necessary documentation.

1 Month  3 Months  6 Months  9 Months  12 Months  +

**Initial Regional Review**

**SHPO Consultation**
- If no adverse effects, 3 months

**USFWS/NMFS Consultation, 2 months if no adverse effects**

**USFWS/NMFS Consultation, 12 months for Biological Assessment**

**EO 11988 Floodplain Management and 8 Step Process, 6 months**

**Development of Tiered SEA from GPD PEA, 6 months**

**Development of EA, 12 months**
- EA complete only after all consultation is complete

**EO complete only after all consultation is complete**
EHP Review Process

Grantee:
- Submit EHP Review packet to GPDEHPinfo@fema.dhs.gov

GPD EHP Review Team:
- Review EHP Review Packet
- Is the packet complete?
  - Yes: Recommend project as Type A, B, or C
  - No: Submit additional information to GPD EHP Review Team

Type A:
- Review project and notify PA

Type B:
- Is project Type B or C?
  - Yes: Review project and notify PA
  - No: Send to FEMA REO for review

Type C:
- Send to FEMA REO for review

FEMA REO:
- Review project and notify PA

Program Analyst:
- Notify Grantee that project is approved