



FEMA Environmental and Historic Preservation (EHP) Frequently Asked Questions and Acronyms

Question	Answer
What is the cutoff age of a structure for FEMA to consider it historic?	50 years from the current date
What do you mean by initiation?	Initiation of a project is defined for EHP purposes as actually starting the project, i.e., installation of equipment or groundbreaking
Grantees are the SAA's? It comes to IA HSEMD then to D.C.?	Yes. All EHP information should be routed through the SAA office. They will forward it on to the EHP team in Washington D.C. This is done because the EHP approval does not mean the project is approved by the SAA. The EHP approval only covers Federal environmental laws and Executive Orders, it does not cover any other grant processes
What if we purchase equipment using grant funds and someone else installs it?	That still must undergo an EHP review. Breaking up a project does not exclude it from Federal environmental review
How long has EHP been around and do we have to go back?	The National Environmental Policy Act (NEPA) was signed into law in 1969. This has always been something that requires compliance but FEMA GPD has recently made a strong push to communicate these requirements to grantees and educate them on how to comply
FEMA Region 7 required we go back to the 2008 EOC grant. We are close to closing out. Will it happen with HSGP?	FEMA Region 7 has the programmatic authority over the EOC grant, and therefore can request EHP information be provided on a previous year's EOC. HSGP is managed by FEMA GPD at Headquarters
There's a grey area where someone may have a project that should be reviewed. When in doubt, should they check with the FEMA Program Analyst?	Yes. The FEMA Program Analyst is a great resource for this information. Information Bulletin (IB) 345 is also a good reference point for which projects require an EHP review. Remember, however, that sub recipients should first coordinate with IA HSEMD before inquiring directly with the FEMA Program Analyst
If only submitting for 2 of the 8 categories, should we complete only 2 of the 8 subsections?	Yes. You only have to complete the sections of the screening form that are relevant to your project.
Aren't there some situations where you'd have to submit a training or exercise project for EHP review? Explain.	For those projects defined in the Programmatic Environmental Assessment (PEA) and IB 345, you do not have to submit. See http://www.fema.gov/government/grant/bulletins/index.shtm However, there are some exercises that would require a review such as an exercise that involves explosives and will be taking place in a parking lot. That kind of project would require EHP review. On the

	<p>other hand if you are doing an explosives training class at a facility that is designed to accommodate explosives training courses and it is being taught by explosives experts, then it would not require a review. Also, anything emitting hazardous materials would require an EHP review as well as major changes to existing exercises such as an increase from 10 people to 1,000 people attending an exercise</p>
<p>You said we could use Google in order to get aerial maps, but it's notorious for being out of date</p>	<p>Google is the best free map source we have. You can submit a paragraph saying what is different from the picture</p>
<p>Regarding generators, what about portable....required for EHP....if mentioned on the AEL?</p>	<p>No. Certain items may be notes on the Authorized Equipment List as requiring an EHP review, however may in fact not need a review. Portable generators are a good example. This is because some of the AEL categories are broad. Generators are flagged on the AEL because some require installation. However, if you are purchasing a <i>portable</i> generator it does not require an EHP review simply because it's not stationary. Refer to IB 345 for a list of projects that do not require an EHP review</p>
<p>Should I call the SHPO and HP folks and get them all involved right now?</p>	<p>No. We encourage grantees to submit all their project information to FEMA GPD and we will reach out to the SHPO directly. It is the Federal agency's responsibility to conduct SHPO consultation. The SHPO is also bound to respond to us in 30 days or we can assume concurrence. The SHPO is not bound to any timelines when a state or local contacts them</p>
<p>We ended up filling out 6 sections of the screening form. Is that normal?</p>	<p>The grantee must fill out the sections of the form that apply to the proposed action. It's usually a more complex project that requires so many sections be complete, and so it is something that we have seen before. Generally however, the number of sections completed is small in number. It's not about the number of sections completed, but rather making sure that all sections to which the project would apply are fully complete</p>
<p>NTIA grant under ARRA, requirements are similar...we can't spend any of their money before it's been blessed. Beyond that, how similar are they? Talk about the other Federal agencies: their blessing vs. FEMA. Does it apply to this? Other Federal agencies EHP approvals, does it automatically mean FEMA will approve?</p>	<p>NTIA as a Federal agency has their own NEPA compliance process. It is probably fairly similar to FEMA's process but they are not interchangeable. Each Federal agency is required to conduct their own review. FEMA can choose to adopt another agency's finding but we must review the materials and make that determination. If you have received approval from another agency please send all the documentation to us and we will review their findings and may be able to adopt their decision or use their information to complete our review.</p>
<p>Is PSIC done through FEMA or did you go through commerce guidelines?</p>	<p>PSIC goes through the Department of Commerce NTIA</p>

<p>Will FEMA not allow a project due to EHP concerns?</p>	<p>The EHP review is primarily centered around making informed decisions. It is very rare that FEMA would tell a grantee that they cannot do their project. This would only occur if endangered species were being threatened or if the project was going to occur on a hazardous site. There are times where FEMA will have to negotiate a MOA with a SHPO.</p>
<p>If someone wants to put a fixed generator alongside City Hall, are they still required to give the age of the building if they're putting the generator beside it?</p>	<p>Yes, this is due to the concept of the area of potential effects (APE). A generator can affect the view-shed of a historic structure. The APE will differ depending on the type of project. Obviously a 300' tower will have a larger APE than a generator. What we want to know is the age of the structures that are visible from the project site. We will need photographs of buildings in vicinity, etc.</p>
<p>What is the difference between the email addresses being provided?</p>	<p>CSID (askcsid@fema.gov) is where projects are submitted through...it's a portal. The other address (GPDEHPinfo@fema.gov) is for questions or to check the status of a project review.</p>
<p>Please clarify renovation and construction</p>	<p>Renovation is generally projects that stay within the existing footprint. New construction involves new facilities or expanding a footprint.</p>
<p>If you use state funds for part of the project and Federal funds for part of the project, do you need to have an EHP review?</p>	<p>If you are talking about building a communication tower with state dollars and then using Federal funds for all the equipment that will be mounted on the tower and the communications shed and fencing around the tower then the entire project still gets federalized and will require an EHP review. However, there are limits to this. If a Joint Operations Center is being constructed primarily with state funds, we won't have to review a \$40 million building because Federal funds are being used to outfit one of the rooms with video monitors and lighting for \$100,000.</p>
<p>If doing trench rescue training within our own facility, do we have to worry about it? Or just if we go offsite?</p>	<p>If the training is being conducted within a facility that is meant for that training and it has been done before then you do not have to submit for EHP review. However, if this is the first trench rescue training done at the facility or if you are disturbing the ground more than previous training, it would be wise to check with the EHP team at GPDEHPinfo@fema.gov. Iowa has strict ground disturbance laws and it is best to be careful.</p>
<p>If we have access to a school or dorm for training and it will be torn down afterwards, depending on age...</p>	<p>We have to look at it regardless. Let us know that it will be torn down</p>
<p>Do you want to see the little stars everywhere on the photo showing everywhere we are going to poke a hole in building for training?</p>	<p>No. Representative photographs are what we are looking for</p>

What if want to replace existing security cameras in a 100-year-old courthouse?	That project would require review. Please let us know if you will be replacing the cameras with models that are similar in size and color.
If I know you're going to approve it, why am I going to send it to you?	Under NEPA grantees cannot self-certify. The Federal agency must check all the information and make the final decision.
What is the average turnaround time?	30-60 days is generally the timeframe we are looking at. Some may get done faster. If the project requires an EA than it will probably be a minimum of 6 months.
Is an Environmental Assessment on the locals to do?	Yes. We encourage the grantee to prepare the EA since they are most familiar with the project. Grants funds can be used for the preparation of this documentation.
Can you submit an EHP for approval prior to project approval, including projects that may, or may not, be grant funded?	Wait until project/funding is approved
We want to use EMPG funds as match to local contributions for a project. EMPG would fund 2 of 8 generators. EHP for those two projects only?	If your generator is funded in part by the EMPG match, EHP is required only for the federally funded portion i.e. the two generators that will be purchased with federal funds. Don't "dice and slice" projects [in effort to avoid EHP]. Note: If the grantee/sub-grantee further sub-grants money, i.e. from the county to local/city level, the grantee, sub-grantee is still responsible. Responsibility extends to the lowest, project level.

Clarifications/Reminders

<p>If the state has its own environmental laws and review process, the project still must be submitted to FEMA and Sara and Brian will be able to determine whether it warrants a federal review. Many states have their own environmental laws but those cannot be substituted for the Federal review. FEMA must still review and approve the proposed action for projects funded with FEMA grant funds. States can provide to FEMA environmental information that was prepared for a state review, but it is not a substitute for the Federal review. This also applies to projects that were funded and reviewed by other federal agencies, whereby a review of the project by FEMA still must be conducted.</p>
<p>If there is confusion among local agencies as to whether a project needs to be reviewed, reach out to the State or to your FEMA Program Analyst</p>
<p>Processes take time. Try to front load the projects so you allow enough time for review. You can't go ahead without it. Otherwise you can get stuck with the bill. "It would cause a delay" is not a reason not to do it.</p>
<p>Regarding the "Grant Number" requested as part of the EHP Screening Form - The grant award is the part that goes to you (recipients). It helps us to know the grant award amount to help us locate the grant when we need</p>

to reference it. We also like to assess the dollar value of those projects that have been submitted for clearance.

We don't need to see aerial photos for internal renovations

If there is any disagreement at any level on whether it should be submitted... call. Also if there is a disagreement among your employees as to how it should be handled, we (Sara/Brian) will submit a response in writing

Frequently Used Acronyms

AEL	Authorized Equipment List
APE	Area of Potential Effects
ARRA	American Reinvestment and Recovery Act
COMS	Communications
CSID	Centralized Scheduling and Information Desk
EHP	Environmental Planning and Historic Preservation
EIS	Environmental Impact Statement
EMPG	Emergency Management Preparedness Grant Program
EOC	Emergency Operations Center. Acronym also used to refer to the EOC grant program.
FONSI	Finding of No Significant Impact
GDP	Grant Programs Directorate
HSGP	Homeland Security Grant Program
IB	Information Bulletin
M&A	Management and Administration
MOA	Memorandum of Agreement
MOU	Memorandum of Understanding
NEPA	National Environmental Policy Act
NSGP	Non-Profit Security Grant Program
NTIA	National Telecommunications and Information Administration
PEA	Programmatic Environmental Assessment
PPE	Personal Protection Equipment
PSIC	Public Safety Interoperable Communications
REO	Regional Environmental Officer
ROD	Record of Decision
SAA	State Administrative Agency
SHPO	State Historic Preservation Office
TCNS	Tower Construction Notification System
TSGP	Transit Security Grant Program