



**Office of the Governor
Homeland Security Grants Division (HSGD)
EHP FAQs**

Question: Why does a grant project need an Environmental and Historic Preservation (EHP) review?

Answer: Actions proposed by a federal agency are subject to an environmental planning, compliance, and review process required by the National Environmental Policy Act (NEPA) of 1969. As a federal entity, the Grant Programs Directorate (GPD) within the Federal Emergency Management Agency (FEMA) is responsible for integrating NEPA and other laws, regulations, and Executive Orders (EOs) into the EHP review process. By accepting federal funds, grantees accept the responsibility of complying with NEPA and other laws, regulations, and EOs, as required by GPD. As part of this responsibility, subgrantees must participate in the GPD EHP review process by providing information necessary to complete an EHP review.

Question: When should a subgrantee begin planning for an EHP review process?

Answer: Planning for an EHP review process should start in the pre-project phase (IJ phase). Planning early and gathering information early can expedite the EHP review process.

Question: Can work begin on a project during the EHP review process?

Answer: No. The EHP review process must be completed and an official approval notification must be received **before** projects are implemented.

Question: What is an EHP review packet and what is needed to complete it?

Answer: An EHP review packet is a compilation of all of the relevant EHP information and documentation that is necessary for GPD to conduct a complete EHP review of a project. An EHP review packet contains:

- A detailed project description;
- Dimensions/acreage/square footage of the proposed structure and/or land area affected by the project;
- Communication tower height and type (i.e., guyed, lattice, monopole);
- Clear, color photographs of the area affected;
- Aerial photographs of the project vicinity;
- Detailed description of ground disturbance caused by the project;
- Description of special equipment used, and staging areas, etc.;
- Age (year built) of the structure or building occupied or used.

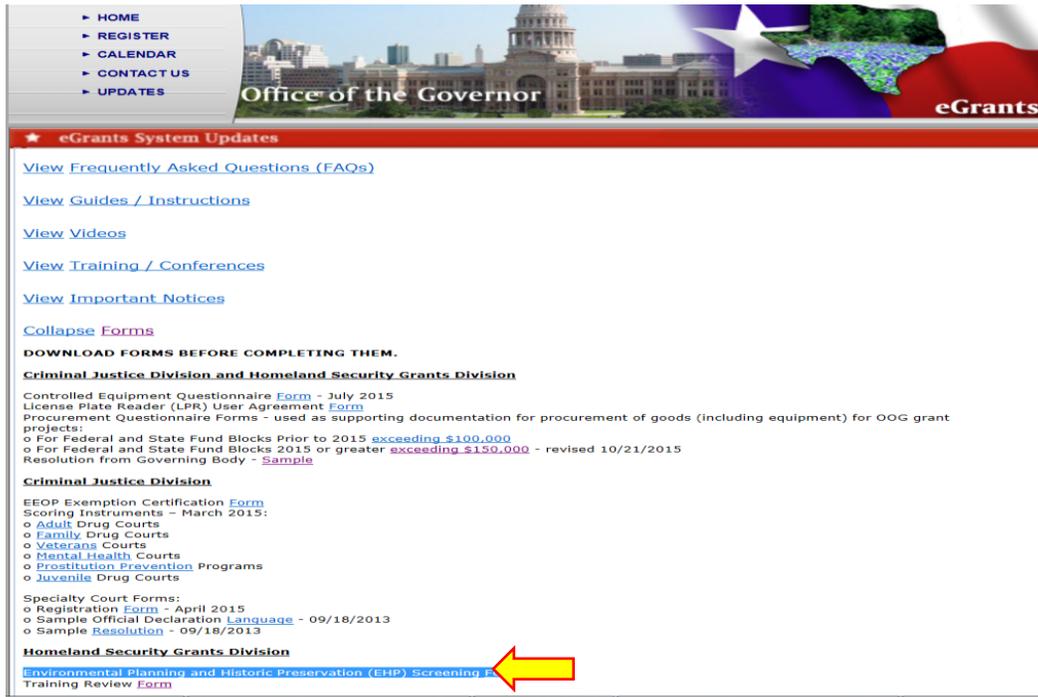
Note that GPD has also developed an Environmental and Historic Preservation Screening Form as a tool to assist grantees in supplying the necessary information for a complete EHP review packet.



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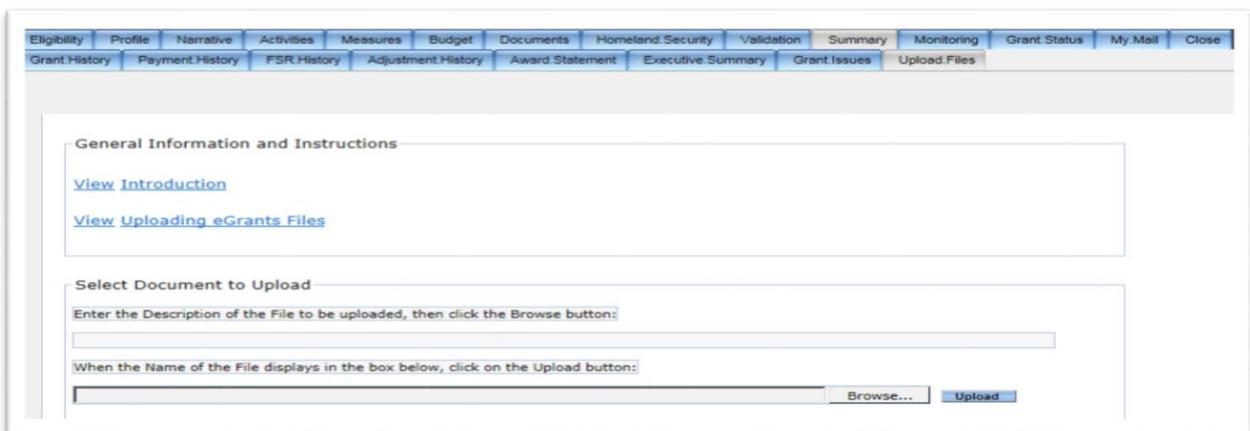
Question: Where do I find a copy of the [EHP Screening Form](#)?

Answer: The EHP Screening Form may be downloaded from the eGrants system by going to the Forms link located under “Updates” on the eGrants home page.



Question: How do subgrantees submit EHP Screening Forms for review?

Answer: Subgrantees must upload their completed EHP Screening Forms into the eGrants system. To upload a file you must open the grant for which the EHP screening form is needed select the “Summary” tab, and then the “Upload.Files” sub-tab.





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Question: For an EHP review, what project description information is needed?

Answer: The project description should include the following components:

- What the project involves,
- The dimensions of any proposed structures,
- What, how, and where equipment is being installed,
- Where the project is proposed to take place,
- The basic steps required to complete the project, and
- The project's goals and how those goals are proposed to be accomplished.

Question: What is considered "ground disturbance" for a project?

Answer: Ground disturbance is anything that generally breaks ground or changes the condition of the ground's surface (i.e., installation of a concrete pad or a guard shack). Some examples of ground disturbing activities include the installation of fence posts for perimeter fencing and trenching for utility lines.

Question: What is the role of Regional Environmental Officers (REO)?

Answer: REOs are environmental and historic preservation specialists based in each of the ten FEMA regions. They are responsible for reviewing projects with the potential to adversely affect the human environment, referred to as "Type C" projects. REOs are also responsible for engaging in resource agency consultation and may work closely with grantees and the GPD EHP team for those projects that require an increased level of analysis to determine the impacts to the human environment.

Question: What is the definition of a Type A project and who approves them?

Answer: Type A projects are projects that have undergone an initial screening by the federal Project Analysts (PA) and have been determined to have no impact to EHP resources (e.g., classroom training). Type A projects are approved by the PA, and do not require review by the GPD EHP team or the REO. For Type A projects, the PA notifies HSGD of the EHP approval, and then HSGD notifies the subgrantee.

Question: What is the definition of a Type B project, and who approves them?

Answer: Type B projects are projects that have been screened by the PA, and forwarded to the GPD EHP team for further review. Type B projects meet the following criteria:

- No new ground disturbance
- No new construction
- Proposed work is confined to the existing footprint
- No historic properties are present in the project vicinity
- No use of chemical/biological agents, explosives, fire, or other hazardous materials that could impact the environment



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Question: What is the definition of a Type C project and who oversees those reviews?

Answer: A Type C project has the greatest potential to impact the environment and includes projects that involve new construction, installation of equipment in an area of potential effect, modification of buildings or structures 50 years old or older, and the installation of communication towers. Type C projects are entered into FEMA's Environmental Management Information System (EMIS), sent to the appropriate REO for analysis, and final approval.

Question: What is the timeline for an EHP review and when can I anticipate a compliance determination for my project?

Answer: EHP reviews will vary based on the complexity of the project, the resources affected, and the amount of information that was initially provided in the grant. If the level of documentation required is relatively simple, then the total review time from receipt of a complete EHP review packet may take up to 45 business days. If the project in question requires further EHP review (e.g., an Environmental Assessment (EA) or an Environmental Impact Statement (EIS)), then the time to complete the appropriate documentation is likely to be longer, and may take up to a year or more to complete.

Question: How can I get help on the EHP Review Process?

Answer: Your assigned HSGD Grant Manager is available and can provide training and technical assistance to help you: a) answer questions regarding the EHP screening form, b) comply with EHP requirements, and c) understand the review process.

Question: What is a Programmatic Environmental Assessment and what effect does it have on the EHP process?

Answer: The Programmatic Environmental Assessment (PEA) details the expected environmental impacts associated with the implementation of the programs funded by FEMA's Grant Programs Directorate. The PEA defines project types for which no environmental impacts are expected; these projects (e.g.: portable equipment, PPE, vehicles) do not require additional NEPA documentation.

Question: Do we still need to submit EHP Review packet if training is all classroom training?

Answer: Classroom, web-based training, conferences, and workshops conducted within closed facilities are classified as a Type A projects (PA should be made aware of training). Classroom training activities WOULD NOT require a formal EHP review, and EHP documentation would not need to be submitted to GPD. The exception to this, as stated in FEMA Information Bulletin 345, would be if the training will involve Explosives, Chemicals or Fire.



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Question: Are buildings over 50 years automatically deemed a "historical building?"

Answer: Buildings or structures that are 50 years old or older are potentially eligible for listing under the National Historic Preservation Act. All buildings over 50 years of age must undergo an EHP review to determine whether: a) the building/structure is historic and b) the proposed action would impose adverse impacts that alter the character of that building/structure.

Question: If the asset is over 50 years old and it is a Dam or a water treatment plant is the EHP still required?

Answer: Yes. EHP is required for any structure that is over 50 years of age to determine whether: a) the building/structure is historic and b) the proposed action would impose significant impacts that alter the character of that building/structure.

Question: Do Type B projects require photographs too?

Answer: Yes, Type B projects require color photographs that clearly indicate where the installation of equipment will occur (e.g., fencing, bollards, cameras, motion detectors, TWIC readers, generators, etc.). Photos can be helpful in placing the project into context by showing whether there are any nearby historic buildings, floodplains, or potential for new ground disturbance