

Environmental Planning and Historic Preservation (EHP) Compliance (p. 43-45)

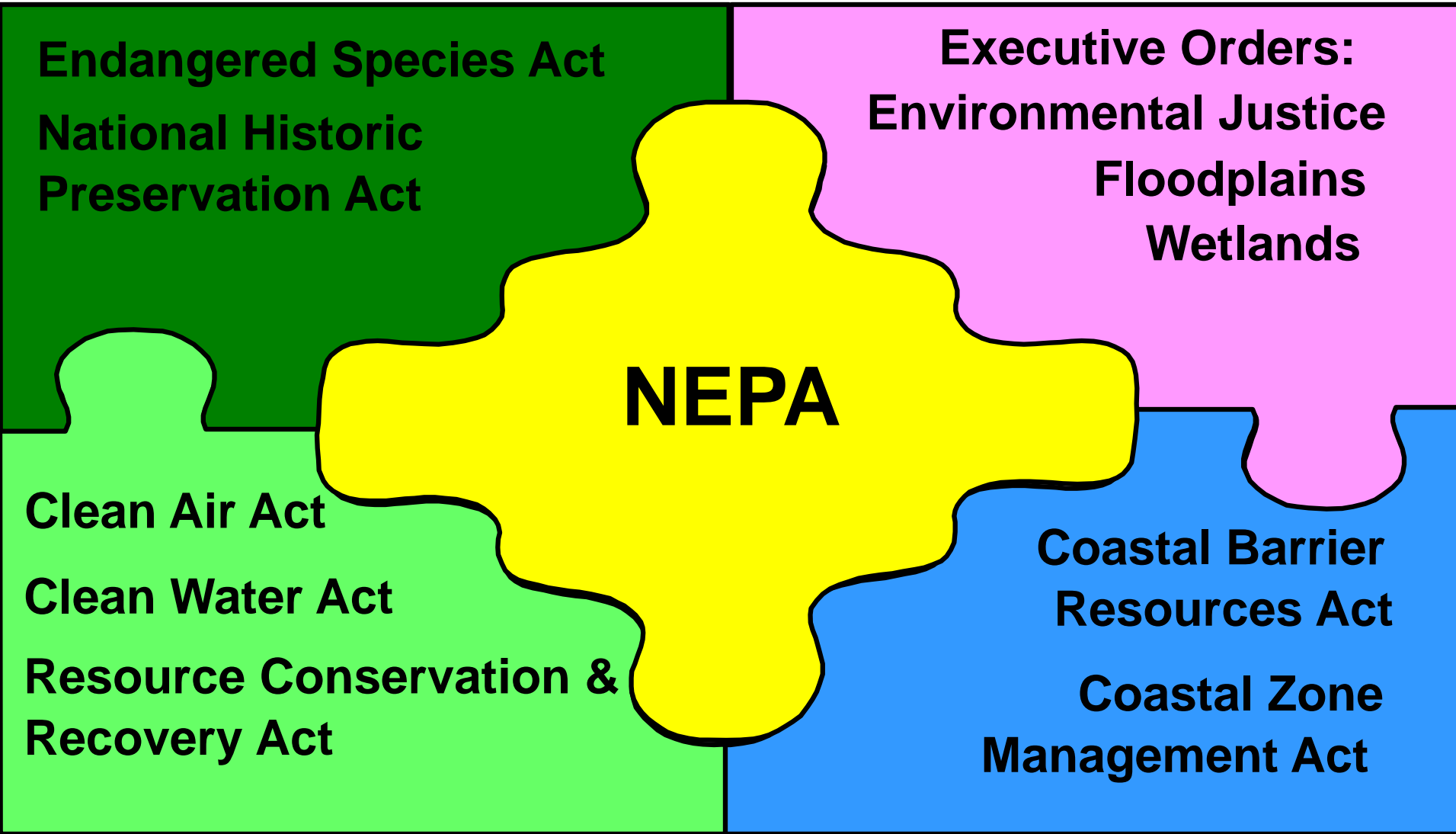


What is an EHP Review?

- Involves an analysis of pertinent project information used to determine the appropriate amount of documentation required for EHP compliance
- All projects funded with Federal grant dollars must comply with EHP laws, regulations, and Executive Orders
- Projects must be EHP approved **before** initiation
- GPD certifies that a grant-funded project is in compliance with applicable EHP laws, regulations, and Executive Orders
- Complex projects will typically require more information to reach a determination



EHP Laws and Executive Orders



What are EHP Considerations?

- Endangered Species
- Cultural Resources
 - Historic properties
 - Archaeological sites
- Air and Water Quality
- Noise
- Fish, Habitat & Wildlife
- Floodplains
- Wetlands
- Coastal Zones
- Agricultural Lands



- Environmental Justice
- Socioeconomic Resources
- Land Use
- Hazardous Materials
- Traffic
- Geology (Topography, Soils)



Importance of Compliance

Compliance

- Protection of natural and cultural resources
- Improved project planning
- Cost efficient
- Programmatic and financial compliance
- Efficient project implementation
- Improved community relations

Non-Compliance

- Project delays
- De-obligation of funding
- Negative publicity
- Civil penalties
- Lawsuits



GPD EHP Review Process

- Grantees are responsible for providing all relevant EHP materials to GPD
- Grant funds may be used for preparation of EHP documentation
- FEMA may be required to consult with State Historic Preservation Office (SHPO), the U.S. Fish and Wildlife Service (FWS), etc.



Roles and Responsibilities

- Grantees
 - Responsible for EHP compliance
 - Submittal of all EHP review packets to GPD
- GPD Program Analysts (PA)
 - Point of contact between the grantee, GPD-EHP Team, and Regional Environmental Officer (REO)
 - Approval of projects with no potential for environmental and/or historic preservation impacts (**Type A**)



Roles and Responsibilities

- GPD-EHP Team
 - Point of contact for PAs and REOs
 - Approval of projects with no potential for environmental and/or historic preservation impacts if certain conditions apply (**Type B**)

- REO
 - Review and approval of project with potential for environmental and/or historic preservation impacts (**Type C**)
 - Responsible for State Historic Preservation Office (SHPO) consultation, with the assistance if necessary from GPD
 - Liaison with grantees and GPD



Type A Projects

- Projects with no potential for environmental and/or historic preservation impacts:
 - Planning
 - Classroom-based training and exercises
 - Field-based training at existing facilities with established procedures
 - Personnel
 - Mobile and portable equipment (PPE, radios, etc.), vehicles, and other equipment that does not require any installation



Type B Projects

- Projects with no potential for environmental and/or historic preservation impacts if certain conditions apply
- Examples include:
 - Physical security enhancements
 - Equipment installation (structures less than 50 yrs old)
 - e.g. physical security/access controls
- Typical questions
 - Does the project involve new ground disturbance or clearance of vegetation?
 - Does project utilize existing infrastructure?
 - Will work occur in the vicinity of historic properties?
 - Will work occur in or near water?



Type C Projects

- Projects that may have the potential for environmental and/or historic preservation impacts:
 - Additional analysis and documentation may be required to adequately address the impacts in compliance with applicable EHP laws and regulations
 - Environmental Assessments (EAs), Biological Assessments (BAs), or Memoranda of Agreement (MOAs) may be required
 - Public involvement may be required



Type C Example: Modification of Buildings & Structures 50 + Years Old

- Equipment installation (e.g. physical security/access controls) on, in, or in the vicinity of historic buildings, piers, bridges, etc.
- Building renovation/hardening (e.g. doors, gates, windows)



EHP Review Packet

- A complete EHP review packet will provide the necessary information to expedite the EHP review
- What are the required contents?
 - Detailed project description
 - Physical address of structure/facility or lat/long
 - Clear **color** photographs (ground-level and aerial)
 - Dimensions/acreage/square footage of structure and/or land affected
 - Extent and depth of ground disturbance for:
 - New construction and structure modification
 - Utility line placement
 - Fencing, light posts, etc., installations
 - Height of communication towers
 - Special equipment being used, staging areas, etc.
 - Year building or structure was built (to include buildings or structures that are in the vicinity)



GPD EHP Updates ★

- CSID point of entry for all EHP review packets
- Programmatic Environmental Assessment (PEA)
- Screening Memo (see CD)
- Authorized Equipment List (AEL)
 - Updated to reflect appropriate equipment
- EHP Mailbox GPDEHPinfo@dhs.gov
 - For EHP related questions



Tips for a Timely EHP Review

- A clear and descriptive project description, with clear color photos and maps
- Submit materials as soon as you receive your award notice or in your planning phase
- Include any previous Master Plans or other environmental documentation
- *What* work is being proposed, *where* will it take place, and *how* will it be carried out?



EHP Points of Contact

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Questions?



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