

## ENVIRONMENTAL PLANNING & HISTORIC PRESERVATION (EHP)

### COMPLIANCE FAQs & INFORMATION

The Authorized Equipment List (AEL) includes information in the individual equipment descriptions if an Environmental & Historic Preservation (EHP) review is necessary. If the equipment purchased does not require installation and/or is considered mobile, an EHP review is not required.

It is FEMA's policy to act with care to ensure that its disaster response and recovery, mitigation and preparedness responsibilities are carried out in a manner that is consistent with all Federal environmental and historic preservation policies and laws. FEMA uses all practical means and measures to protect, restore and enhance the quality of the environment, to avoid or minimize adverse impacts to the environment.

*Failure to comply with these laws could result in project delays and denial of funding. FEMA through the Environmental and Historic Preservation Program engages in this review process to ensure that FEMA funded activities comply with these laws.*

An EHP review is required for all equipment purchases that are to be installed either **inside or outside** of a building, regardless of the age of the building.

Please refer to the following FAQs on EHP Reviews for further information.

**Projects requiring an EHP Review CANNOT be started until it is APPROVED by FEMA.**

Frequently Asked Questions (FAQs) on EHP Reviews

**Q – If I plan to install a grant funded access control card reader inside a building do I still need to complete an EHP review?** *A – Yes, regardless of whether equipment is installed outside or inside a building, an EHP review is required.*

**Q – If I am installing equipment on a building less than 50 years old, do I have to complete an EHP review?** *A – Yes, an EHP review is required for all modifications to a building. The 50 year requirement applies to DHS/FEMA and determines if a State Historic Preservation review is necessary in addition to an Environmental review.*

**Q – What format do I use to submit visual documentation for a project?** *A – The Guidance for Supporting Photographs for EHP Grant Submissions outlines visual documentation requirements.*

**Q – Do I submit my EHP packet directly to FEMA?** *A – No, you must submit your EHP review when filling out your online EMPG Application. The EMPG Program Coordinator will forward all EHP reviews to FEMA.*

**Q – Do I have to complete separate EHP review forms, checklists, picture documentation, etc. for each project that I am planning that requires an EHP, or can I just submit them all together on the same forms?** *A – Separate EHP documentation packages must be submitted for each individual project if at different locations.*

**Q – If I am purchasing equipment that does not require installation do I still have to complete an EHP review? How can I determine if equipment that I intend to purchase will or will not require an EHP review?** *A – Generally, equipment that does not require installation, such as laptop computers, handheld trace detection units, portable radios, etc. does not require EHP review. The DHS Authorized Equipment List (AEL) should indicate on the equipment description page for each item whether or not an EHP review is required. Equipment installed in vehicles do not require EHP review. If questionable, please contact your assigned HSEM Field Representative.*

**Q – How long will an EHP review take before I am told if it is approved?** *A – Timelines for the EHP review process will vary depending on the complexity of the project and the potential for environmental or historical impacts. The range can be from approximately one week to one year or more. FEMA will determine the need for any additional evaluation and documentation that may be required.*

**Q – How will I be informed of the outcome of my EHP review?** *A – FEMA will supply an official notification to the EMPG Program Coordinator who will then forward their decision on to the Subrecipient.*

**Q – Will my EMPG grant agreement still get executed if I have projects or pieces of equipment that are pending EHP approval?** *A – The EMPG Program Coordinator will not hold up your grant agreement if other projects or equipment within it are pending EHP approval – we will special condition that particular project or piece of equipment that will prohibit expenditures against them until EHP approval is received.*

**Q - If you have one project which will require installation of 25 cameras at various sites, how many “Environmental Planning & Historic Preservation Screening Forms” will I need to submit? Do I submit 25 detailed photos showing the location of each camera to be installed? How detailed should the photographs be? Can one photo cover all with minimal street detail using dots to identify the camera installation locations?** *A – For a project with 25 sites, where the same work is being done at each site, one EHP Screening Form is sufficient, but it should be accompanied by a list of individual project sites with addresses and the ages of the buildings or structures on which equipment will be installed. For photographs, a representative sample will be fine (5 – 10 locations at most), however photographs are needed for all buildings or structures 50 years old or older. Impacts to historic or potentially historic structures can come up fairly frequently in older communities, so having this information up front allows us to easily identify those projects that may need approval from the State Historic Preservation Office (SHPO).*

**Q - If an agency submits an EHP request and later decides to modify that budget item to support another non-related project, how will this impact the pending approval request?** *A – Changes to the project generally need to be reviewed again for EHP, unless they do not impact the work being proposed in any way. If grant funds are going to be re-programmed to a different project, then that project would need to be reviewed for EHP as well.*

**Q - If we have one location with multiple projects (for example - one building requiring fencing, cameras, alarms sensors), do I submit three EHP forms for the individual project? Or just combine all the projects in one request?** *A – If you’re doing multiple projects (fencing, cameras, bollards, etc.) at one site, all of those activities can be combined into a single EHP review packet for the site. Just make sure that the project description and documentation provides details about each component of the project.*

**Please contact your HSEM Field Representative for technical assistance, if necessary.**

**IMPORTANT:** If grant funding is being requested for a **GENERATOR project** (for example) at a soon to be built Public Safety Building - even though the EMPG program is not funding the actual building, the generator is related to the construction project therefore the ground **CANNOT** be disturbed in any way until you receive FEMA's approval of your submitted EHP packet. If the Public Safety Building is under construction at the time of FEMA's review of your EHP packet, FEMA may consider this project **non-compliant** and you may risk the opportunity to receive EMPG funding.

**IMPORTANT:** If grant funding is being requested for a **TOWER project** at a soon to be built Public Safety Building - Even though the EMPG program is not funding the actual building, the tower is related to the construction project therefore, the ground **CANNOT** be disturbed in any way until you receive FEMA's approval of your submitted EHP packet. If the Public Safety Building is under construction at the time of FEMA's review of your EHP packet, FEMA may consider this project **non-compliant** and you may risk the opportunity to receive EMPG funding for your

**NOTE:** Reasonable costs associated with the research & preparation of these documents are **allowable** grant expenditures. Please inquire if other associated costs are reimbursable.