

FEMA and GPD's Environmental Planning & Historic Preservation Review

Ellen Saint Onge

GPD EHP Branch Chief

Ellen.saint-onges@fema.dhs.gov

Elizabeth McWaters-Bjorkman

GPD Environmental Protection Specialist

Elizabeth.mcwaters-Bjorkman@fema.dhs.gov

EMI
Feb 2018



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Environmental Planning & Historic Preservation (EHP)

Why we do EHP:

- What is an EHP Review?
- Why do EHP?
- Benefits vs. Consequences

How we do EHP:

- What We Need to Know
- What We'd Like to Know
- EHP Process, Timelines, & Additional Consultation
- Online Resources and Contacts



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What Is an EHP Review?

Analysis of pertinent project information to determine compliance with environmental laws, regulations, and executive orders:

- All projects funded with federal grant dollars must comply with EHP laws, regulations, and Executive Orders
- EHP review must be completed by FEMA/GPD before project initiation
- Recipients must provide all required EHP information to GPD via the GPD EHP Inbox at GPDEHPinfo@fema.dhs.gov



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National Environmental Policy Act

Act

Public Law 91-190

Congressional mandate that before federal agencies make decisions, they must consider the effects of their actions on the quality of the human environment

- Human environment is broadly defined
- NEPA analysis is scaled to project



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What Are EHP Considerations?

- Cultural Resources
 - Historic properties
 - Archaeological sites
- Floodplains
- Wetlands
- Endangered Species
(including habitat)
- Coastal Zones
- Water Quality
- Air and Noise
- Vegetation and Wildlife



- Environmental Justice
- Socioeconomic Resources
- Land Use and Agriculture
- Hazardous Materials
- Traffic
- Geology (topography, soils)



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EHP Laws and Executive Orders: Basis for FEMA EHP Review

Endangered Species Act

National Historic
Preservation Act

Executive Orders:
Environmental Justice
Seismic Retrofit
Floodplains
Wetlands

NEPA

Clean Air Act

Clean Water Act

Resource Conservation &
Recovery Act

Coastal Barrier
Resources Act
Coastal Zone
Management Act

FEMA and GPD's EHP Review

EHP compliance for GPD-funded projects is GPD's responsibility, in collaboration with:

- ❑ FEMA's Office of Environmental Planning and Historic Preservation (OEHP)
- ❑ FEMA's Regional Environmental Offices



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FEMA's EHP Review

May require consultation with other federal agencies, including informal consultation, formal consultation, or agreement documents.

- **State Historic Preservation Office**
- **Tribal Governments**
- **US Fish and Wildlife Service**
- **US Army Corps of Engineers**



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FEMA's EHP Review

NEPA environmental review process may result in:

- **Categorical Exclusion (CATEX)**
- **Environmental Assessment (EA)**
- **Environmental Impact Statement (EIS)**

NEPA, and other EHP laws and EOs may require public involvement & a public comment period depending on scope and impacts of project.



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Projects that do not Trigger EHP Review

- Planning Documents
- Management and Administration
- Classroom-based Training/Table-top Exercises



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Projects that Trigger EHP Review

- Facility construction
- Modification/renovation of existing structures
- Physical security enhancements to buildings or structures
- Construction or modification of Communication towers
- All ground disturbances



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EHP Review Benefits



- Informed decision-making
- Ensure compliance
- Protect community and investments
- Minimize or avoid potential adverse effects to communities and individuals
- Protect our nation's water, air, coastal, fish and wildlife, agricultural, historical, and cultural resources



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Consequences of Non-Compliance

- Denial of funding
- Project delays
- Negative publicity
- Civil penalties
- Lawsuits



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GPD EHP Review

- ❑ FEMA's EHP Review is required by Federal laws, regulations and Executive Orders.
- ❑ Must be complete before FEMA can fund any project.
- ❑ Purpose of EHP Review is to ensure compliance - not to deny projects. Sometimes projects may need to be modified to minimize impacts.



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GPD EHP Review

- ❑ Costs of environmental review (e.g., archeological surveys, reports) are paid by recipient, and can be part of grant expenditures.
- ❑ Recipients must provide all required EHP materials to GPD via the GPD EHP Inbox at GPDEHPinfo@fema.dhs.gov.



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WHAT WE NEED TO KNOW

HELP US HELP YOU



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OMB Control#: 1660-0115
Expiration Date: 01/31/2017
FEMA Form: 024-0-1

DEPARTMENT OF HOMELAND SECURITY
FEDERAL EMERGENCY MANAGEMENT AGENCY (FEMA)
ENVIRONMENTAL AND HISTORIC PRESERVATION SCREENING FORM

Directions for completing this form: This form is designed to initiate and facilitate the environmental and historic preservation (EHP) compliance review for your FEMA preparedness grant-funded project(s).

There is no need to complete and submit this form if the grant scope is limited to planning, management and administration, classroom-based training, tabletop exercises and functional exercises, or purchase of mobile and portable equipment where no installation is needed.

This form should be completed electronically. Submit completed form through your grant administrator who will forward it to GPDEHPInfo@dhs.gov.

Paperwork Burden Disclosure Notice
Public reporting burden for this form is estimated to average 8 hours per response. The burden estimate includes the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and submitting the form.

SECTION A. PROJECT INFORMATION

DHS Grant Award Number:
Grant Program:
Grantee:
Grantee POC:
Mailing address:
E-mail:
Sub-grantee:
Subgrantee POC:
Mailing address:
E-mail:
Estimated cost of project:

Project title:
Project location (physical address or latitude-longitude):

Project Description. Provide a complete project description. The project description should contain a summary of what specific action is proposed, where it is proposed, how it will be implemented. Include a brief description of the objectives the project is designed to accomplish (the purpose), and the reason the project is needed.

Empty rectangular box for project description.

SECTION B. PROJECT TYPE

Based on the proposed project activities, determine which project type applies below and complete the corresponding sections that follow. For multi-component projects or those that may fit into multiple project types, complete the sections that best apply and fully describe all major components in the project description.

- 1. [] Purchase of equipment. Projects in this category involve the purchase of equipment that will require installation on or in a building or structure. Complete other portions of Section B as needed. Complete Section C.1.
2. [] Training and exercises. Projects in this category involve training exercises with any field-based components, such as drills or full-scale exercises. Complete Section C.2.
3. [] Renovations/upgrades/modifications or physical security enhancements to existing structures. Projects in this category involve renovations, upgrades, retrofits, and installation of equipment or systems in or on a building or structure.

1. Scope of work (complete and accurate)

Bad

Install cameras in courthouse

Good

Install 4 Panasonic VT-5 video cameras on first floor of 1898 county courthouse. Cameras will be installed opposite exit doors, 2 feet below drop ceiling (see diagram for location, position, and height). Wiring will use existing conduits... etc.



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1. Scope of work (continued)

Bad

Build EOC

Good

Build 4 story, 6000 sq ft EOC on vacant lot, last used for farming. Slab on grade construction with 4 ft footers. See site plan. Site will be graded and an estimated two feet of soil removed. Utilities will be installed 2 feet below grade... etc.



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2. Location and Aerial Photo

Address

Latitude / Longitude

Aerial photo with location
marked

Example

1600 Pennsylvania Ave NW,
Washington, DC 20500

N 38.89770, W 77.03652



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3. Ground Level Photographs (with captions)

Bad



Good

North face



South face



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4. Year built (man-made)

Example 1

Construction began 1792, completed 1800

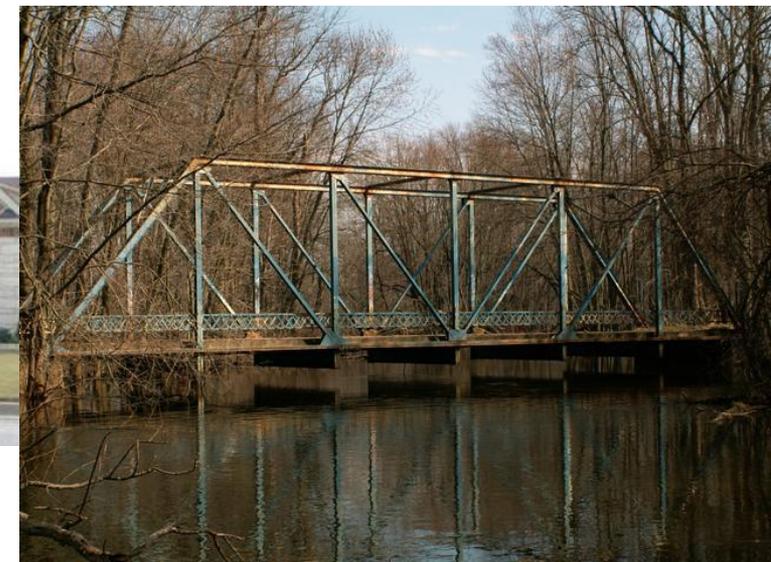
Rebuilt 1817, additions in 1824, 1829, 1901

Interior structural renovations 1927, 1946, 1948



Example 2

Built 2005



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5. Ground disturbance

Grading, removing, or digging into soil

Adding soil to site

If adding soil, where did the soil come from? e.g., commercial source, borrow pit, etc.

Example: length, width, and depth of trenching for conduit



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WHAT WE'D LIKE TO KNOW

HELP EXPEDITE THE REVIEW



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Complete information

1. Complete the screening form
2. Ensure project location, construction date of building, description of any ground disturbances (L x W x Depth).
3. Good photos: indicating where items will be installed, where ground disturbances will occur.
4. Provide any other Agency consultation documents



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Plans, drawings, blueprints



West face



East face



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PROCESS, TIMELINES, & EXTENUATING CIRCUMSTANCES



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What to Expect with a GPD EHP Review

- Complete and submit EHP Screening Form and information to GPD EHP (send to GPDEHPinfo@fema.dhs.gov)
- Recipient will receive receipt confirmation email within 48 hours indicating when the review will start
- Recipient will receive an EHP tracking ID number



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What to Expect with a GPD EHP Review (Continued)

- GPD EHP reviews EHP packet. Notifies recipient if additional information is needed
- GPD EHP completes initial compliance review and makes a determination within 30 days of initial receipt.
- The outcome will be that the EHP Review is complete, or that it is being sent to a Regional Environmental Office for further review
- PA notified of GPD EHP review results



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Common Reasons for EHP Delays

Incomplete information: request for more information = project delays

- Poor or absent ground-level photographs
- Inadequate project description
- Poor or absent aerial photographs
- Extent of ground disturbance unclear or not included
- No project location (physical addresses or latitude-longitude)



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Extenuating Circumstances

Section 106 (NHPA) consultation required (SHPO or Tribal response to request for consultation within 30 days, for complex projects consultation may take longer)

ESA formal consultation required (may take up to 135 days)

Environmental assessment is required

Memorandum of agreement is required



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Online Resources

- GPD EHP Information on-line – screening form, instructions, policy guidance, etc...

<http://www.fema.gov/environmental-planning-and-historic-preservation-compliance>



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Contact Us

GPDEHPinfo@fema.dhs.gov



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