

Environmental Planning and Historic Preservation Webinar (EHP), September 25, 2012

FAQs

Question: What photographs might be required when a project is fully internal for a building that is not more than 45 years old?

Answer: Labeled, color photographs always help us in our review. Always include an aerial photo as well ground-level exterior photos. If there is no ground disturbance and all work is internal to a building less than 45 years old, we are often able to review a project without interior photos. However, labeled interior photos often help us better understand the scope of the project; therefore, we recommend including them.

Question: Do we need the floodplain and wetlands map for that kind of project?

Answer: Grantees and subgrantees that are submitting documentation for an Environmental and Historic Preservation (EHP) review do not need to create floodplain or wetland maps for any project. For efficiency, the Grants Program Directorate (GPD) has decided to create those maps as needed. What is more important is that an aerial photo of the project site is included so GPD can better understand the area to be affected by the project.

Question: We know you were working on a revised screening form, but we haven't seen it. Where can we find it?

Answer: The form has undergone some changes during the last year. The information that is being requested on the form has *not* changed (other than not requiring the maps as mentioned above). What has changed on the form is its format and appearance, and we have clarified the form's instructions. The Federal Emergency Management Agency's (FEMA) website is being upgraded, so GPD has not had an opportunity to post the new form. For now, grantees and subgrantees can request the form via email (GPDEHPinfo@fema.dhs.gov).

Question: With regard to receiving email confirmation, we liked that we were getting those within a day or two, but we understand that the system has changed. Does your email system allow read receipts? That would mitigate some of the anxiety people feel waiting for a week or more to get confirmation.

Answer: GPD can look into the feasibility of automatically generating a received receipt. Until then, if grantees or subgrantees have a question about a project being received, they

should send an email asking about the status of the project or call someone on the EHP team. Please do not re-send a project, as having duplicate emails in our inbox can cause some confusion.

Question: What is the size capacity per email of the mailbox for submitting documents?

Answer: The GPD EHP info inbox can handle messages up to 20 megabytes. If attachments are bigger than that, please separate them and send them in multiple emails and let GPD know in the email that the submission is coming in more than one message.

Question: I thought the info bulletin said we didn't have to submit Type-A projects.

Answer: Screening forms do not need to be submitted for Type-A projects.

Question: Our port security grants are in the port, so 99 percent of them are in a floodplain area. If you're putting up a new light pole on a dock or a camera, will the project automatically be Type C?

Answer: It depends on the amount of ground disturbance in the floodplain. Some Type-C projects are still approved very quickly. For projects that involve putting up cameras or lights on existing structures, it would not necessarily be determined to be a Type C.

Question: Should we submit an EHP form regardless of type, and then let you determine whether it would be Type A, B, or C?

Answer: If you determine that it is a Type-A project for which you do not have to submit an EHP screening form, talk to the Program Analyst (PA) involved in the grant program to help make that determination and document it in FEMA's files.

Question: Does this apply to hazard mitigation grant programs?

Answer: This process is for GDP preparedness grants only. Mitigation grant programs have a separate but similar process.

Question: Does the EHP have to be done before funding is released?

Answer: Yes, and before the project is initiated. Initiating a project prior to receiving FEMA's permission to do so may jeopardize the funding for the project.

Question: How is that affected when funding sources have been delayed?

Answer: Not at all from our perspective. We have projects coming in from 2009 and even 2008, but they still require EHP review.

Question: Does every training institution in the State need to be approved for EHP?

Answer: GPD does not approve training facilities. GPD is operating under the assumption that any training conducted by the grantee or subgrantee is in a facility that is designed for the training in question. As such, if the training is in a classroom or at a site designed for that specific kind of training (e.g., fire suppression training at a fire department's fire training facility), then it is a Type A, and an EHP Screening Form does not need to be submitted. If it is outdoor, "boots on the ground" field training (e.g., an emergency response exercise at a local high school), it needs to be submitted to us. If there are any questions about a specific project, ask your PA or the EHP team.

Question: For clarification, on page 38 of the slide deck, it is suggested that we send written hard-copy requests to the State Historic Preservation Office (SHPO) for project review to help expedite the EHP process. Does that mean that we can submit an EHP in advance of awarded Homeland Security Grant Program HSGP funds for a project? Our projects go through a rigorous vetting process for 6–8 months prior to submitting the application to the U.S. Department of Homeland Security (DHS) for the funds. Generally, the EHP is not submitted until we have a federal grant number for a project to associate the with EHP screening form. If it is possible to have the projects reviewed while we are waiting on our allocations, would we send the screening forms to the GPDEHPinfo@fema.dhs.gov address? If so, what should we put in the grant number field?

Answer: EHP screening forms and reviews need to be associated with a DHS/FEMA grant number. Subgrantees can provide project information to the SHPO prior to submitting an EHP Screening form to provide an opportunity to receive advice from the SHPO early in the development of the project and to potentially expedite the review process. When the screening form is subsequently submitted, FEMA can use that information to conduct its formal Section 106 consultation under the National Historic Preservation Act, which must be done by the Federal agency. Please be aware that not every SHPO is willing to coordinate with grant applicants prior to the formal consultation process with the Federal agency.

Question: On the issue of ground disturbance: I understand that ground disturbance in a floodplain or wetland will place a project into the Type-C category, but the term "significant ground disturbance" was also used in the presentation. Approximately how much ground disturbance would be considered significant enough to place a project into

the Type-C category? Or would even minimal ground disturbance still require FEMA Regional Environmental Officer (REO) review?

Answer: The amount and extent of ground disturbance that could result in a project becoming a Type-C project depends on the area that is being disturbed (i.e., previously disturbed or pristine, wetland, etc.), the type of ground disturbance (e.g., for a chain link fence vs. a retaining wall), and the sheer volume of ground disturbance. Another thing to remember is that even if a project is a Type C and is sent to a FEMA REO for review, it still may be determined by the REO to not have the potential to cause a significant impact and receive a Categorical Exclusion (CATEX).

Question: Does the FEMA have EHP subject-matter experts available to answer local EHP questions?

Answer: Depending on the subject matter, FEMA may be able to help with EHP-related questions. FEMA has EHP specialists within GPD as well as in each of its regions.

Question: Since ceiling tiles are removable and interchangeable and no groundbreaking disturbance was caused, do EHP requirements apply?

Answer: The key to determining whether ceiling tiles or any other equipment fall within the mobile and portable equipment CATEX category is based on whether they will be “installed.” For the purpose of this CATEX, “installation” is defined as placing equipment into position for use by physically connecting it in a more or less permanent manner. Physical connection includes any method of attaching equipment to any structure by means of fasteners (screws, nails, brackets, etc.) that involves removing, replacing, or altering interior or exterior building materials or causing ground disturbance to provide access for electrical wiring, conduits, connections, or any other purpose related to use of the equipment. If the ceiling tiles are not “installed” in any way, then they could be considered “plug and play” or portable equipment. If they need to be screwed, mounted, or glued into or onto anything, we would consider this as installation that requires an EHP screening form and EHP review. In other words, replacing ceiling tiles in a previously installed grid does not require EHP review, but installing the grid as well as the tiles would require EHP review by FEMA.

Question: If the building is less than 50 years old, do EHP requirements apply for equipment that is within the facility?

Answer: Even if a building is less than 50 years old, anything that is installed in or around the building still requires an EHP screening form and review. The age and potential significance of the structure would determine whether GPD could apply a Categorical Exclusion to the project. Please be aware that the National Historic

Preservation Act requires FEMA to consider if properties are significant, even if they are less than 50 years of age (e.g., properties designed by nationally prominent architects).

Question: If a piece of equipment is mounted or affixed to a wall that does not affect the integrity or infrastructure of a building, does an EHP apply (e.g., room placards that are screwed in the wall)?

Answer: Please see the response above concerning ceiling tiles. We consider mounting or affixing something to a wall to be “installation” that would require an EHP screening form and review. If the building is less than 50 years old, the review will likely be quick.

Question: Are there EHP requirements for newly renovated or remodeled buildings for equipment that is being installed?

Answer: EHP review requirements apply the same for newly renovated or remodeled buildings as they would for any other building. For buildings that are more than 50 years old but have been renovated or remodeled recently, any recent remodeling or renovations are important for us to know about during the review.

Question: Do interchangeable; standalone door frames with equipment mounted to them require EHP reviews?

Answer: Without having more specific information on this type of project, we would consider this type of equipment to be “installed” and require an EHP screening form and review.

Question: At one point it was implied that all projects, regardless of type, require submission of the EHP screening form. Then later, in response to a question, it was stated that Type-A projects do not require the EHP screening. Our automated testing system is Type A. Does it require EHP screening?

Answer: If a project falls under the type of project that has been determined to have no potential for impacts (i.e., Type A—classroom training or plug-and-play computer equipment, for example), then an EHP screening form is not required. If you have a question about whether a project qualifies as a Type A, contact your PA or the EHP team.