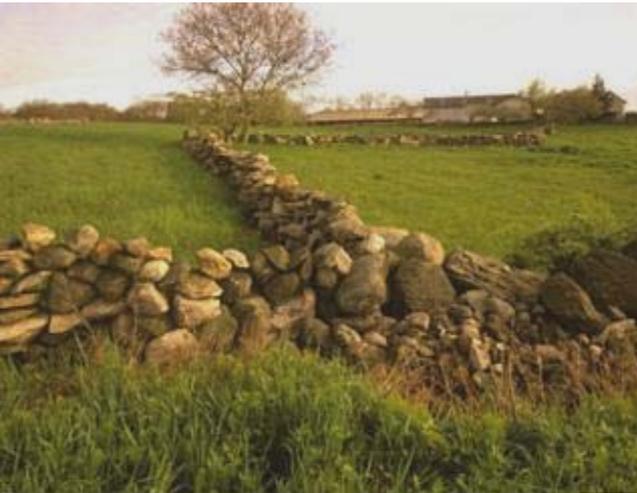


# Environmental Planning and Historic Preservation (EHP) Compliance (p. 43-45)

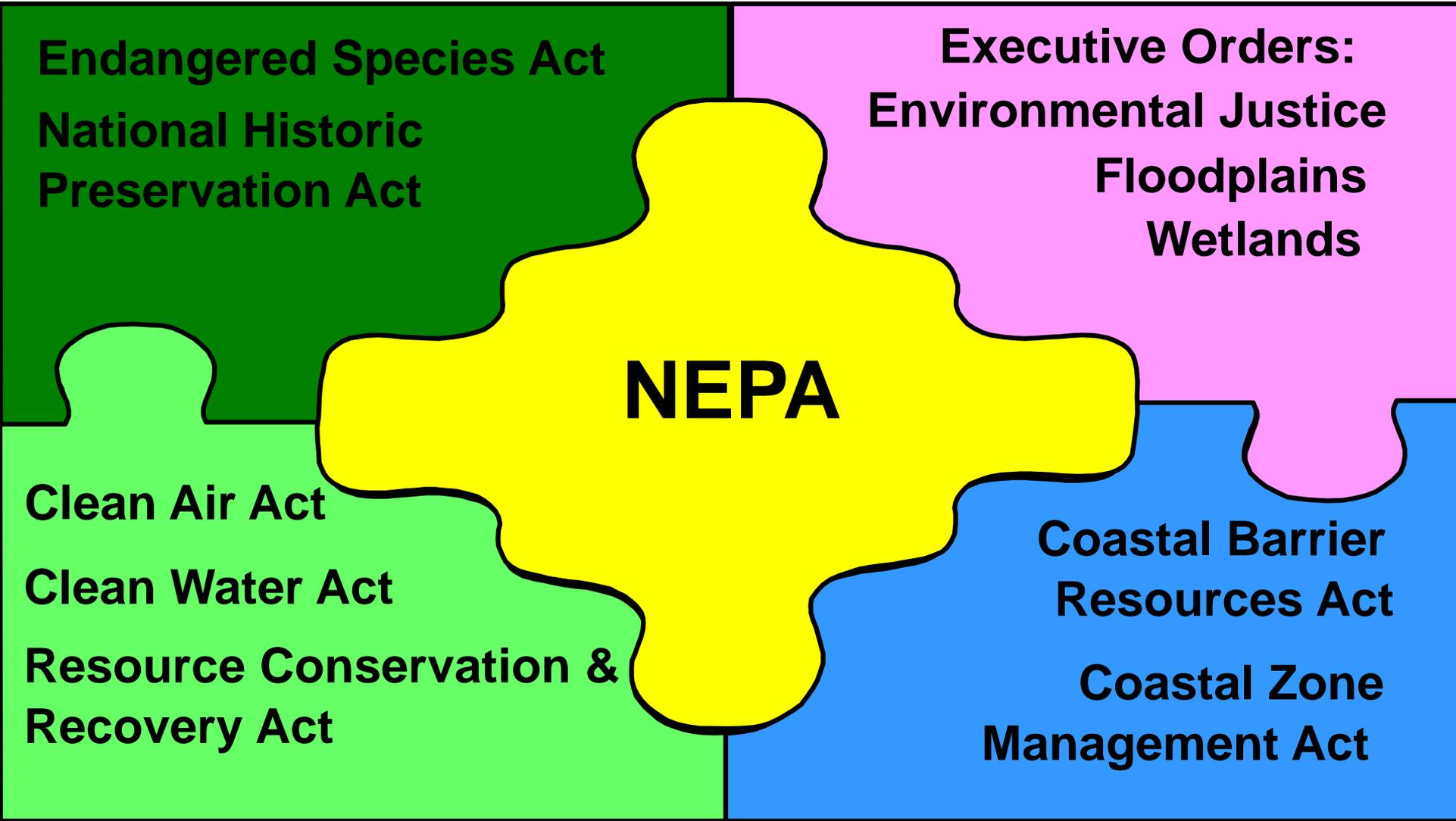


# What is an EHP Review?

- 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](mailto: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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