



Frequently Asked Questions (FAQs) Environmental Planning and Historic Preservation (EHP) Review Process

Question: Why does a grant project need an EHP review?

Answer: Actions proposed by a Federal agency are subject to an environmental planning, compliance, and review process required by the National Environmental Policy Act of 1969 (NEPA). By accepting Federal funds, grantees must comply with NEPA, as well as all other applicable environmental laws and regulations.

Question: When should a grantee begin planning for an EHP review process?

Answer: Planning for an EHP review process should start in the pre-project phase. Planning early and gathering information early can expedite the EHP review process. EHP documentation may be submitted for review as soon as awards are made.

Question: Can work begin on a project during the EHP review process?

Answer: No. The EHP review process must be completed and an official approval notification must be received **before** projects are implemented. However, with concurrence from the FEMA Program Analyst, some funds may be available for studies and equipment purchases before completion of the EHP review.

Question: What is an EHP Review Packet?

Answer: An EHP Review Packet is a compilation of all of the relevant EHP information and documentation that is necessary for GPD to conduct a complete EHP review. For detailed information, please refer to the *Environmental and Historic Preservation (EHP) Review Packet Overview*.

Question: How do grantees submit EHP Review Packets for review?

Answer: Grantees should submit their EHP Review Packets to GPDEHPinfo@dhs.gov. Subgrantees should submit all information to their grant administrative agency.

Question: For an EHP review, what project description information is needed?

Answer: A detailed project description states what work is being proposed, where it will be accomplished, and how the work will be done.



Question: What is considered “ground disturbance” for a project?

Answer: Ground disturbance is anything that changes the condition of the ground’s surface. Examples of ground disturbing activities include the installation of structures, fences, light posts, and utility line trenches.

Question: What are the different EHP project classifications?

Answer: Type A projects include classroom training and acquisition of mobile/portable equipment. Type A projects are approved by the Program Analyst and do not require any further EHP review.

Type B projects are projects that involve any installation of equipment that meet all of the following criteria

- No new ground disturbance
- No new construction
- Proposed work is confined to the existing footprint
- No historic properties are present in the project vicinity
- No use of chemical/biological agents, explosives, fire, or other hazardous materials that could impact the environment

Type B projects are approved by the GPD Environmental Specialist

Type C project are those that involve new construction, installation of equipment in an area of potential effect, modification of buildings or structures 50 years old or older, and construction of communication towers. Type C projects are reviewed and approved by FEMA’s Regional Environmental Officers.

Question: What is the timeline for an EHP review and when can I anticipate a compliance determination for my project?

Answer: The timeline for EHP reviews varies based on the complexity of the project, the resources affected, and the amount of information in the initial submission of the EHP Review Packet. Type A and B projects generally are approved within 30 days. Reviews of Type C projects with easily mitigated impacts can be completed with a few months. Type C projects that require agency consultations or an Environmental Assessment can take up to two years.

Question: How can I get help on the EHP Review Process?

Answer: Contact GPD EHP staff at GPDEHPinfo@fema.dhs.gov. There are also



resources available on the GPD website
(<http://www.fema.gov/government/grant/nondisaster.shtm>).

Question: What is the GPD Programmatic Environmental Assessment and what effect does it have on the EHP process?

Answer: The Programmatic Environmental Assessment (PEA) details the expected environmental impacts associated with implementing the programs funded by FEMA's Grant Programs Directorate. The PEA defines project types for which no environmental impacts are expected, including mobile/portable equipment, personal protective equipment, vehicles, classroom training. No additional EHP documentation is required for these types of projects.

Question: Do we still need to submit EHP Review Packet for classroom training?

Answer: Classroom training is covered by the PEA and does not require EHP documentation.

Question: Are all buildings or structures over 50 years deemed as historic?

Answer: Buildings/structures that are 50 years old or older are potentially eligible for listing under the National Historic Preservation Act. All buildings/structures 50 years of age or older must undergo an EHP review to determine whether the building/structure is historic, and whether the proposed action would result in adverse impacts.

Question: Do Type B Projects require photographs?

Answer: Yes, Type B projects require labeled, color photographs that clearly show where all equipment will be installed and where ground disturbance will occur. Photographs are required for both interior and exterior installations regardless of the age of the building/structure. Additional details about the requirements for photographs are available in the EHP Screening Form.