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FEMA

Grant Programs Directorate Information Bulletin
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TO: All State Administrative Agency Heads
All State Administrative Agency Points of Contact
All State Homeland Security Directors
All State Emergency Management Agency Directors
All Urban Areas Security Initiative Points of Contact
All Tribal Nation Points of Contact
All Public and Private Sector Port Security Partners
All Private Sector Transportation Security Partners
All Eligible Regional Transit Agencies

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SUBJECT: Environmental Planning and Historic Preservation Requirements for Grants

This Information Bulletin (IB) is an update to IB # 271 released in December 2007; it is intended to provide general guidance to grantees on the environmental planning and historic preservation (EHP) review process for the grant programs administered by the Grant Programs Directorate (GPD) at the Federal Emergency Management Agency (FEMA).

In particular, this IB provides guidance for those programs that will fund communication towers, physical security enhancements, new construction, renovation, and modifications to buildings or structures. These projects have the potential to affect environmental resources and historic properties through ground disturbance, impact to wetlands, floodplains, coastal zones, and other water resources; alteration of historically significant properties; and impact to threatened and endangered species, migratory birds, and habitat. Consequently, FEMA engages in a compliance review process to ensure proposed projects comply with applicable Federal EHP laws, regulations, and Executive Orders.

Please note that this IB does not apply to the Public Safety Interoperable Communications (PSIC) grants. Those projects are being cleared by the Department of Commerce using the PSIC Programmatic Environmental Assessment and Finding of No Significant Impact. For more information on the PSIC environmental process please visit the PSIC webpage at http://www.ntia.doc.gov/psic/news.html.

Project Descriptions and EHP Review Process

Project descriptions are required to be submitted by the State Administrative Agency (SAA) or direct grants recipients (relative to the State Homeland Security Program – Tribal [SHSP-Tribal], Port Security Grant Program [PSGP], and Transit Security Grant Program [TSGP]) to GPD electronically via the Centralized Scheduling and Information Desk (CSID) at askcsid@dhs.gov prior to the initiation of the project. Preferred submission formats are those supported by Microsoft Office (doc files) and Adobe Acrobat (pdf files). JPEG is the preferred picture format, but other widely supported file types may be used. CSID will send an email confirming receipt of the project description.

Attached is an EHP Screening Memo to assist in the gathering of all pertinent information for an effective EHP review and instructions for preparing an aerial map of location. Below is the required information that should be included in your submission.

- Name of project, name of grant and grantee, grant award number, fiscal year, overall purpose, and estimated cost
- Physical address of where the project will be implemented (street address, city, and state, or latitude and longitude coordinates)
- Visual documentation including but not limited to color site/structure photographs; plans/drawings that define the size and precise location of proposed work; U.S. Geological Survey topographic maps; FEMA Flood Insurance Rate Maps; U.S. Fish and Wildlife Service National Wetlands Inventory and U.S. Army Corps of Engineers approved wetland maps, if available; U.S. Department of Agriculture soil survey maps and color aerial photographs
- Project description should include as applicable:
    - Dimensions/acreage/square footage of structure and/or land affected, with height and structural support information for all communication towers
    - Extent and depth of ground disturbance for new construction and structure modification, including trenching for utility lines, installation of fencing and light posts, tower footings and pads, etc.
    - Best management practices to be used for erosion and sediment control
- Special elements of the project, including:
    - Special equipment that will be used, staging areas, access roads, easements, etc.
    - Extent of structural modification
- Year building/structure was built
- Information regarding features, resources, and potential adverse impacts at or near the project area, including:
    - Water bodies (rivers, lakes, streams, wetlands, etc.), floodplains, and coastal zone
    - Historic and cultural resources (historic districts, buildings, landscapes, bridges, piers, dams, archaeological sites, etc.)
    - Migratory birds, threatened and endangered species, and/or critical habitat
    - Vegetation, including general types of plants, trees, or lack thereof
    - Geologic features, including soil and topography
    - Tribal cultural and religious sites and special areas (forests, wildlife refuges, reserves, etc.)

- Community facilities and services (e.g. churches, schools, hospitals, etc.)
- Hazardous wastes, superfund site, etc. (http://www.epa.gov/enviro/html/em/ or http://www.epa.gov/myenviromental)
- Any recent or relevant studies, reports, or surveys that were prepared for other agencies or purposes and provide information on environmental resources and/or historic properties in the project area
- Any agency coordination documents regarding environmental and/or historic resources

Grantees are responsible for the preparation of documentation required to fulfill compliance responsibilities under Federal EHP laws; this documentation may include, but is not limited to site studies, biological assessments, archaeological surveys, environmental assessments, and environmental impact statements. Furthermore, they are also responsible for implementation of any mitigation measures required to address potential adverse impacts that may have been identified during the EHP review process. Costs associated with the preparation of these documents are allowable grant expenditures.

Timelines for the EHP review processes will vary on the complexity of the project and the potential for environmental or historical impacts. A project review may take 30 to 45 working days for those proposed activities with a potentially low environmental or historical impact. A project that has potential significant adverse impacts to EHP resources, such as new construction or installation of communication towers greater than 200 feet, may take up to one year to review. Based on the review of the project description, GPD may determine the need for additional evaluation and documentation. Furthermore, the Authorized Equipment List (AEL) has been updated to reflect those equipment purchases for which an EHP review may be required. During the project planning phase, please allot time for EHP reviews.

Inadequate project descriptions and/or documentation of the presence of environmental resources and historic properties in a project area may cause significant delays in the timeliness of the review and affect project implementation. Failure of the grantee to meet all Federal, State, and local EHP requirements, to comply with project conditions established during the EHP review, and/or to obtain applicable permits and approvals may result in project delays or de-obligation of funds.

Grantees must receive written approval from their Program Analyst (PA) prior to the use of grant funds for project implementation.

In addition to the screening memo, the following Web site may have useful information: www.fema.gov/plan/ehp.

For questions on the status of your EHP review packet, or for any questions related to the EHP review processes please contact your PA or CSID at 1-800-368-6498 or via email at askcsid@dhs.gov.