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FEMA

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TO: All State Administrative Agency Heads
All State Administrative Agency Points of Contact
All State Homeland Security Directors
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SUBJECT: Environmental Planning and Historic Preservation Requirements for Grants

This Information Bulletin (IB) provides general guidance to grantees on environmental planning and historic preservation (EHP) requirements for grant funded projects involving communication towers, physical security enhancements, new construction, renovation, and modifications to buildings and structures that are 50 years old or older. This IB applies to all such projects (regardless of Fiscal Year award) funded by the Homeland Security Grant Program (HSGP), the Infrastructure Protection Program (IPP), and the Emergency Management Performance Grants Program (EMPG). 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 and migratory birds. Consequently, FEMA engages in a compliance review process to ensure proposed projects comply with applicable federal EHP laws, regulations, and Executive Orders.

Statement of Work

A Statement of Work (SOW) is required to be developed and submitted to FEMA prior to the initiation of projects referenced in this IB. Essential elements and information to include in the SOW are:

- Basic project information (name of project, name of grant and grantee, grant award number, fiscal year, overall purpose and scope of the project, estimated cost, etc.).
- Precise location of the project (street address, city, and state, or latitude and longitude coordinates).
- Visual documentation (site/structure photographs; plans/drawings that define the size and precise location of proposed work; US Geological Survey topographic, flood and wetlands maps; aerial photographs, etc.).
- Description of the project, including (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.
- Special elements of the project, including:
  - Special equipment that will be used, staging areas, access roads, easements, etc.
  - Extent of structural modification.
- Year affected building/structure was built (if applicable).
- Information about features, resources, and potential adverse impacts at or near the site, including:

    - Water bodies (rivers, lakes, streams, wetlands, etc.).
    - Floodplains.
    - 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.
    - Tribal cultural and religious sites.
    - Special areas (forests, wildlife refuges, reserves, etc.).
- 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.

Environmental Planning and Historic Preservation Requirements
Site selection is a key factor that can affect the number and complexity of EHP issues that may need to be addressed for a project. Grantees are responsible for identifying environmental resources and historic properties in the project area, which may require coordination with appropriate local, State and/or Federal resource agencies. This information should be included in the SOW and submitted to FEMA in the initial stage of project formulation.

Based on the review of the SOW, FEMA may determine that projects with the potential to have significant adverse impacts to EHP resources and/or public controversy require additional evaluation and documentation, and FEMA will notify the grantee accordingly. Documents required to fulfill compliance responsibilities under Federal EHP laws must be prepared by qualified professionals with EHP expertise and may require a public comment period. Grantees are responsible for the preparation of such documents as well as for the implementation of any mitigation measures identified during FEMA's EHP review that are necessary to address potential adverse impacts. Costs associated with the preparation of EHP documents are allowable grant expenditures.

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 the project's implementation. Failure of the grantee to meet all Federal, State and local EHP requirements, comply with project conditions established during FEMA's EHP review, and/or obtain applicable permits and approvals may result in project delays or the denial of funding.

FEMA EHP Review Process
Grantees must submit SOWs electronically through their authorized State SAA (or designee) to their FEMA preparedness officer. 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. Project reviews may take several weeks or months to complete, so sufficient time and resources must be incorporated into the project planning process to accommodate EHP requirements. Grantees must receive written approval from FEMA prior to the use of grant funds for project implementation.

Additional information regarding EHP compliance requirements for FEMA-funded grant projects is available on the FEMA website at http://www.fema.gov/plan/ehp/ehp-applicant-help.shtm. Questions may be directed to your designated preparedness officer or to the Centralized Scheduling and Information Desk at 1-800-368-6498 or via email at askcsid@dhs.gov.