



Environmental Planning and Historic Preservation Review (EHP)

2023

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EHP Agenda

- Overview of EHP
- Laws and executive orders in EHP review
- EHP Review Process
- Importance of EHP compliance
- The EHP Form
- Questions and answers



The American Burying Beetle photo by the
Missouri Dept. of Conservation

EHP – FEMA - OHS

- For grant programs such as NSGP and SHSP, FEMA is responsible for ensuring environmental review of their programs and grants is completed.
- Information is gathered from subrecipients by the Missouri Department of Public Safety – Office of Homeland Security (OHS) to ensure the EHP Form is complete and accurate before it is submitted to FEMA.



What is an EHP Review?

Analysis of pertinent project information to determine compliance with environmental laws, regulations, and executive orders:

- All projects funded with federal grant dollars must comply with EHP laws, executive orders, and regulations
- EHP review should be completed before project initiation to ensure grant funding
- All FEMA grant programs have EHP responsibilities



Saline Valley Conservation Area photo by
Missouri Dept. of Conservation

EHP Reviews

- Grant subrecipients are responsible for supplying complete and accurate information.
- Costs of environmental surveys and assessments (e.g., archeological and endangered species surveys, environmental assessments) are paid by grant subrecipient, and can be part of grant expenditures.
- Purpose of EHP Review is to ensure compliance - not to deny projects. We will work with you to achieve a compliant project.



Onondaga Cave photo by
Missouri Dept. of Natural Resources

Laws and Executive Orders in EHP Review

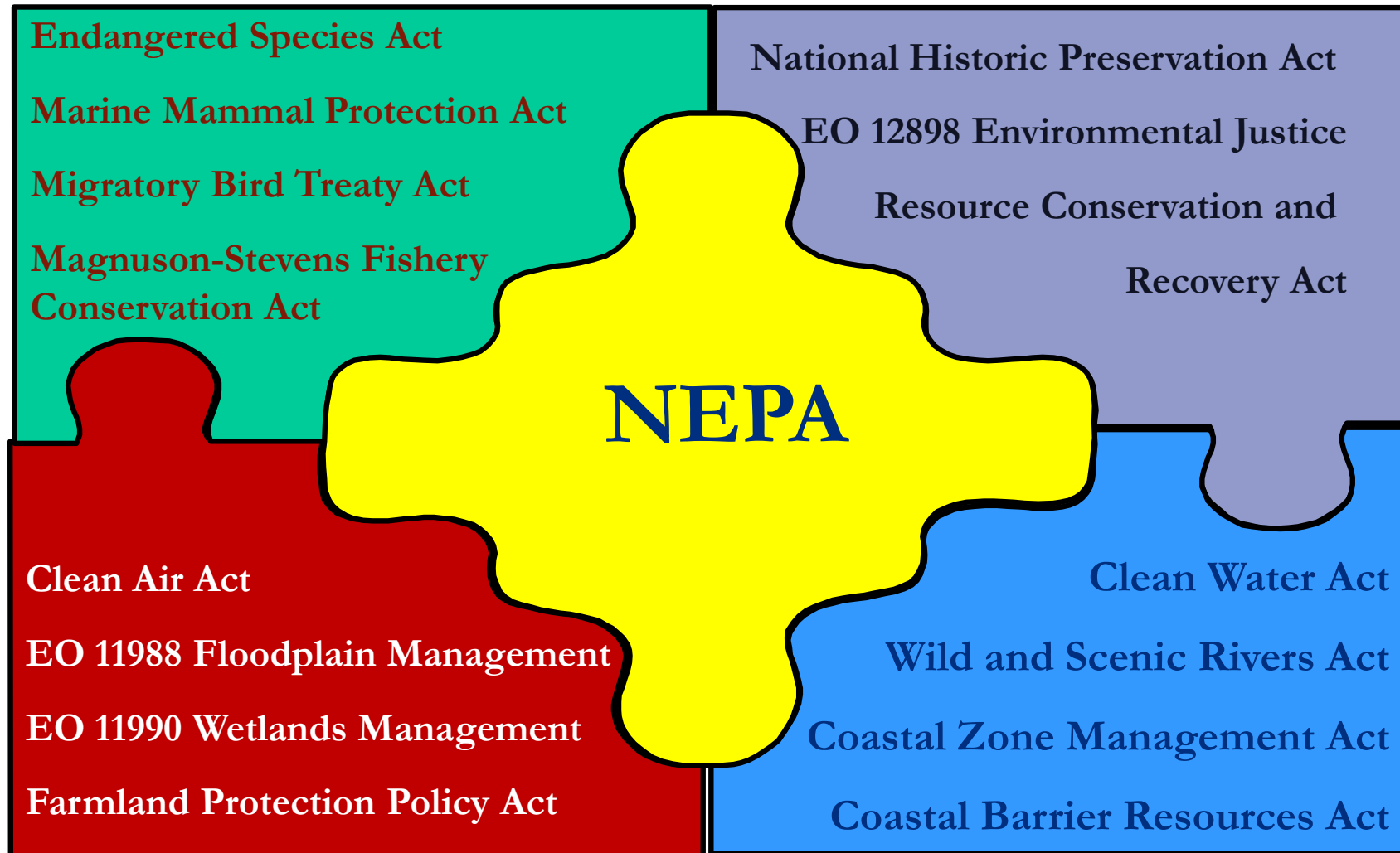
National Environmental Policy Act (NEPA)



Public Law 91-190

- Congressional mandate that federal agencies must consider the effects of their actions on the quality of the human environment before they make decisions or commit resources
- A decision-making process that does not require a specific outcome
- Requires consideration of alternatives
- Requires consideration of the entire action – not just the funded portion

EHP Laws and Executive Orders: Basis for FEMA EHP Review



Consultation and Coordination with Other Agencies

Some laws and executive orders require consultation or coordination on the EHP with other state and federal agencies. Some of those are:



US Fish & Wildlife

- Endangered Species Act



State Historic Preservation Offices

- National Historic Preservation Act



US Army Corps of Engineers

- Wetlands and water bodies



Tribal Governments

- Tribal land, ground disturbance, other resources important to a Tribe

Consultation with other Agencies

- Timelines for these consultations are statutory or negotiated with the respective agencies and are not only at FEMA's discretion.
- FEMA submits its determination and requests concurrence. The other agencies can either concur or comment on the action and further negotiation may be necessary.



Pallid Sturgeon photo by
National Park Service

National Historic Preservation Act (NHPA)

- Requires federal agencies to consider the effects of their actions on historic properties before approving or funding an action. May include consultation with State and/or Tribal Historic Preservation Offices (SHPOs and THPOs).
- Historic Properties include:
 - ✓ Buildings and structures
 - ✓ Sites, including archaeology cultural landscapes
 - ✓ Objects
 - ✓ Districts



Wilson's Creek National Battlefield
photo by US National Park Service



Big Spring Historic District Cultural
Landscape photo by
National Park Service



Glasgow Presbyterian Church photo by
US National Register of Historic Places

Floodplain and Wetlands Protection

EO 11988 and EO 11990 Requirements

- Maintain the beneficial value of functional floodplain/wetlands

- Avoid actions within or affecting floodplains or wetlands

- Assess beneficial or adverse effects on floodplains and wetlands

- 8-step review for impacts



Missouri River Floodplain Wetland photo by
US Geological Survey

Endangered Species Act (ESA)



Coldwater Crayfish photo by
Missouri Dept. of Conservation

- Protects endangered and threatened species and their critical habitats.
- If there are potential impacts, FEMA will consult with US Fish and Wildlife Service (USFWS) and/or National Marine Fisheries Service (NMFS).

- Work or staging in potential habitats are more likely to trigger consultation. Including:
 - Wetlands
 - Water bodies
 - Trees
 - Dunes
 - Undisturbed areas



Greater Prairie-Chicken photo by
Missouri Dept. of Conservation

EHP Review Benefits

- Informed decision-making
- Protect community and investments
- Minimize or avoid potential adverse effects
- Protect our nation's natural and historic resources



Hercules Glades Wilderness photo by
USDA Forest Service

EHP Review – Yes or No?

FEMA-Funded Projects That Do NOT Require an EHP Review*

- Planning documents
- Management and administration
- Classroom-based training/table-top exercises
- Mobile equipment and supplies
- Plug-in equipment; requires no wiring or installation onto walls, ceilings, or floors

**Note that this list of examples is not all-inclusive*



FEMA-Funded Projects That DO Require an EHP Review*

- Facility construction
- Modification/renovation of existing structures
 - *Could be as simple as drilling a hole in a wall!*
- Physical security enhancements to buildings or structures
- Construction or modification of Communication towers
- All ground disturbances
- Training/exercises not at a designated training facility

**Note that this list of examples is not all-inclusive*



What Can Slow Down the Review?

Common Reasons for EHP Delays

- Inadequate project description
- Poor or absent aerial photographs
- Extent of ground disturbance unclear or not included
- No project location (physical addresses or latitude-longitude)
- Poor or absent ground-level photographs
- Unresponsiveness to requests for additional information

Other Circumstances That May Cause Delays

- National Historic Preservation Act (NHPA) consultation required with the State Preservation Office (Minimum 30 days, longer for complex projects)
- Consultation with other state and local agencies as needed, based on EHP Laws and Executive Orders
- Environmental assessment is required



Consequences of Non-Compliance

- Denial of funding
- Project delays
- Negative publicity
- Civil penalties
- Lawsuits



**DO NOT PROCEED WITH YOUR PROJECT
UNTIL YOU HAVE EHP CLEARANCE!!**

EHP Submission

The EHP packet must be completed and submitted early!!

Projects started before clearance is issued will
NOT be reimbursed!

- If the project scope changes, another EHP form must be approved prior to work beginning
- EHP must include each building/area that will be touched
- Submit forms via Correspondence Component in WebGrants

The EHP Form

The EHP Form – Section A

DHS Grant Award Number:

The Federal Identification Number on your subaward agreement

Grant Program:

Listed in Funded By on your subaward agreement

Grantee:

Information is as listed here

SECTION A. PROJECT INFORMATION

DHS Grant Award Number: EMW-2023-SS-00085

Grant Program: FY 2023 State Homeland Security Program (SHSP)

Grantee: Missouri Department of Public Safety

Grantee POC: Chelsey Call

Mailing Address: PO Box 749, Jefferson City, MO 65101

E-Mail: Chelsey.Call@dps.mo.gov

The EHP Form – Section A

The information requested here refers to your agency and project

Sub-Grantee:

Sub-Grantee POC:

Mailing Address:

E-Mail:

Estimated cost of project:

On this form, the physical address is preferred.



Project title:

Project location (physical address or latitude-longitude):

Project Description. Provide a complete project description. The project description should contain a summary of what specific action is proposed, where it is proposed, how it will be implemented. Include a brief description of the objectives the project is designed to accomplish (the purpose), and the reason the project is needed. Use additional pages if necessary. If multiple sites are involved, provide the summary for each site:

EHP Project Description Example

Bad

- Install cameras in courthouse

Good

- Install 4 Panasonic VT-5 video cameras on first floor of 1898 county courthouse. Cameras will be installed opposite exit doors, 2 feet below drop ceiling (see diagram for location, position, and height). Wiring will use existing conduits..., etc.

The EHP Form – Section B

Select the Project
Type that best applies

Generally, boxes
1 and 3 apply

1. ☐ **Purchase of equipment.** Projects in this category involve the purchase of equipment that will require installation on or in a building or structure. Complete other portions of Section B as needed. Complete Section C.1.
2. ☐ **Training and exercises.** Projects in this category involve training exercises with any field-based components, such as drills or full-scale exercises. Complete Section C.2.
3. ☐ **Renovations/upgrades/modifications or physical security enhancements to existing structures.** Projects in this category involve renovations, upgrades, retrofits, and installation of equipment or systems in or on a building or structure. Examples include, but are not limited to: interior building renovations; electrical system upgrades; sprinkler systems; vehicle exhaust systems; closed circuit television (CCTV) cameras; security fencing; access control for an area, building, or room; bollards; motion detection systems; alarm systems; security door installation or upgrades; lighting; and audio-visual equipment (projectors, smart boards, whiteboards, monitors, displays, and projector screens). Complete Section C.3.
4. ☐ **Generator installation.** Projects in this category involve installation of new or replacement generators, to include the concrete pads, underground fuel and electric lines, and if necessary, a fuel storage tank. Complete Section C.4.
5. ☐ **New construction/addition.** Projects in this category involve new construction, addition to, or expansion of a facility. These projects involve construction of a new building, or expansion of the footprint or profile of a current structure. Complete Section C.5.
6. ☐ **Communication towers, antennas, and related equipment.** Projects in this category involve construction of new or replacement communications towers, or installation of communications-related equipment on a tower or building or in a communications shelter or building. Complete Section C.6.
7. ☐ **Other.** Projects that do not fit in any of the categories listed above. Complete Section C.7.

The EHP Form: Section C

Complete the corresponding details for the Project Type you selected in Section B

1. Purchase of equipment
2. Training and exercises
3. Renovations/upgrades/modifications or physical security enhancements to existing structures
4. Generator installation
5. New construction/addition
6. Communication towers, antennas, and related equipment
7. Other

The EHP Form: Section D

Complete all of the requested information

SECTION D. PROJECT DETAILS

Complete all of the information requested below.

1. ☐ Project Installation

- a. Explain how and where renovations/upgrades/modifications would take place, or where equipment/systems will be installed:

- b. Would ground disturbance be required to complete the project or training? ☐ Yes ☐ No

- If Yes, provide total extent (depth, length, and width) of each ground-disturbing activity. Include both digging and trenching. For example, light poles and fencing have unique ground-disturbing activities (e.g., six light poles, 24" dia. x 4' deep; trenching 12" x 500' x 18" deep; 22 fence posts, 12" diameter x 3' deep, and 2 gate posts, 18" diameter x 3' deep):

- If yes, describe the current disturbed condition of the area (e.g., parking lot, road right-of-way, commercial development):

- c. Would the equipment use the existing infrastructure for electrical distribution systems? ☐ Yes ☐ No

- If no, describe power source and detail its installation at the site:

Ground Disturbance Considerations

Ground disturbance is anything that breaks ground or changes the condition of the ground's surface. Common examples include

- Installation of a concrete pad, fence posts, or bollards
- Trenching for utility lines
- Grading, removing, or digging into soil
- Adding soil to site
 - If adding soil, where did the soil come from? e.g., commercial source, borrow pit, etc.
- Grantee should provide length, width, and depth for ground disturbance
- Grantee should identify any fill material that will be used



The EHP Form: Section D

2. ☐ **Age of structure/building at project site**

a. Provide the year existing building(s) or structure(s) on/in/nearest to the location involved in the proposed project was built:

- If the building or structure involved is over 45 years old and significant renovation, rehabilitation, or modification has occurred, provide the year(s) modified and briefly describe the nature of the modification(s):

b. Are there any structures or buildings that are 50 years old or older in or adjacent to the project area?

☐ Yes ☐ No

- If yes, provide the location of the structure(s), ground-level color photographs of the structure(s), and identify their location(s) on an aerial map:

c. Is the project site listed in the National Register of Historic Places (National Register), or in/near a designated local or National Register Historic District? The internet address for the National Register is: <http://nrhp.focus.nps.gov/>

☐ Yes ☐ No

- If yes, identify the name of the historic property, site and/or district and the National Register document number:

The EHP Form: Section D

3. ☐ Site photographs, maps and drawings

a. Attach site photographs. Site photographs are required for all projects. Use the following as a checklist for photographs of your project. Attach photographs to this document or as accompanying documents in your submission.

- Labeled, color, ground-level photographs of the project site: ☐ Required
- Labeled, color photograph of each location where equipment would be attached to a building or structure: ☐ Required
- Labeled, color aerial photographs of the project site: ☐ Required
- Labeled, color aerial photographs that show the extent of ground disturbance (if applicable): ☐ Attached
- Labeled, color ground-level color photographs of the structure from each exterior side of the building/structure (applicable only if building/structure is more than 45 years old): ☐ Attached

b. Are there technical drawings or site plans available?

☐ Yes ☐ No

- If yes, attach: ☐ Attached

Photos


- All photos must be DIGITAL COLOR review-quality
- Either JPGs or TIFFs files are the best formats
 - Scans of photos lead to the loss of quality of the photos
 - Cropped and resized photos also lead to the loss of quality
- All photos must be a minimum of 4" X 6" with LANDSCAPE orientation preferred
- Label photographs with the address, the side(s) of the building that is visible, and the direction the photographer is facing using North, East, South, West directions
- No more than two (2) photos per page

Photos



- Take photos of all four sides of the subject building
 - Be sure to include outbuildings, such as garages, barns, sheds, etc.
- Make sure there is adequate lighting
- Take photos at an angle that gives a clear representation of the building
- To provide context, include photographs of the surrounding streetscape for each property
- Verify the aerial view is of the correct property
- If ground disturbance is involved, provide photos of the ground that show the surroundings and provide context
- Providing a photo key is recommended

Photos

- It is best if PowerPoint or Word is used to submit the photos
 - PDFs can be difficult to manipulate
- The top of each photo page should contain the agency's name and address, federal grant award number and appendix letter, as applicable
- Each photo on the page should have a figure number
- Provide a brief description of the equipment, its location, and its asset number
- Reminder: no more than two (2) photos per page



Example:
Agency Name
Street Address
City, State ZIP
EMW-2023-SS-00085
Appendix B: Photos



Example:
Figure 1: West side of building -
Exterior camera 1

If Available, Plans, Drawings, Blueprints



West face



East face



Required: Aerial Photograph

Aerial photo example

Can be obtained at
<https://www.arcgis.com/apps/View/index.html?appid=019dd6f39fda4d3b811abfab0878b63b>

You will need to add the labels on additional structures, when applicable

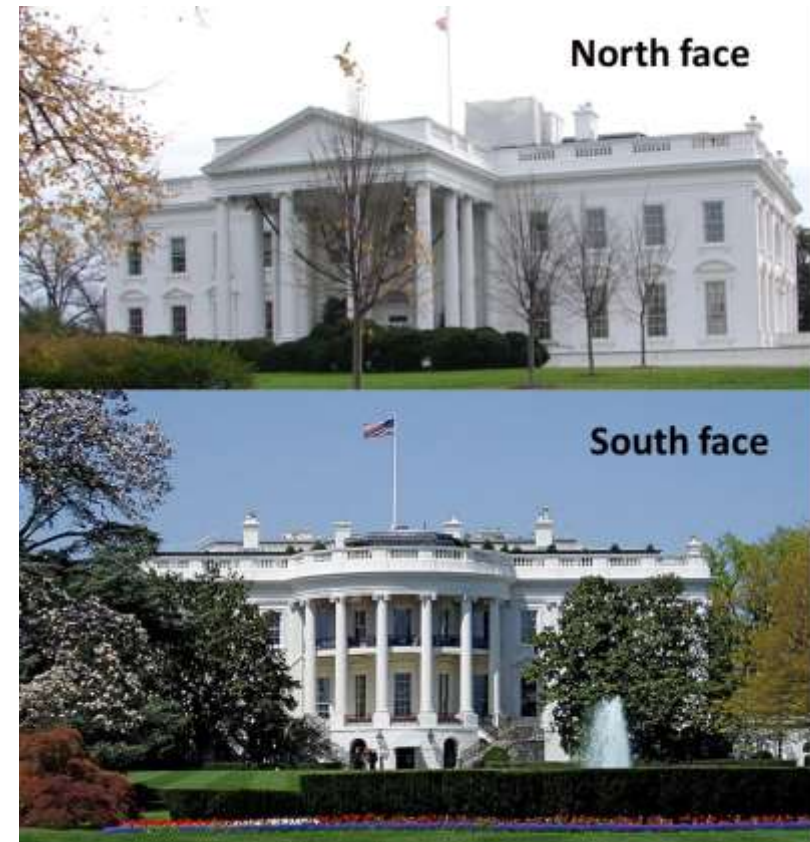


Required: Clear and Complete Ground Level Photographs Examples

Clear and complete ground level photos with captions examples

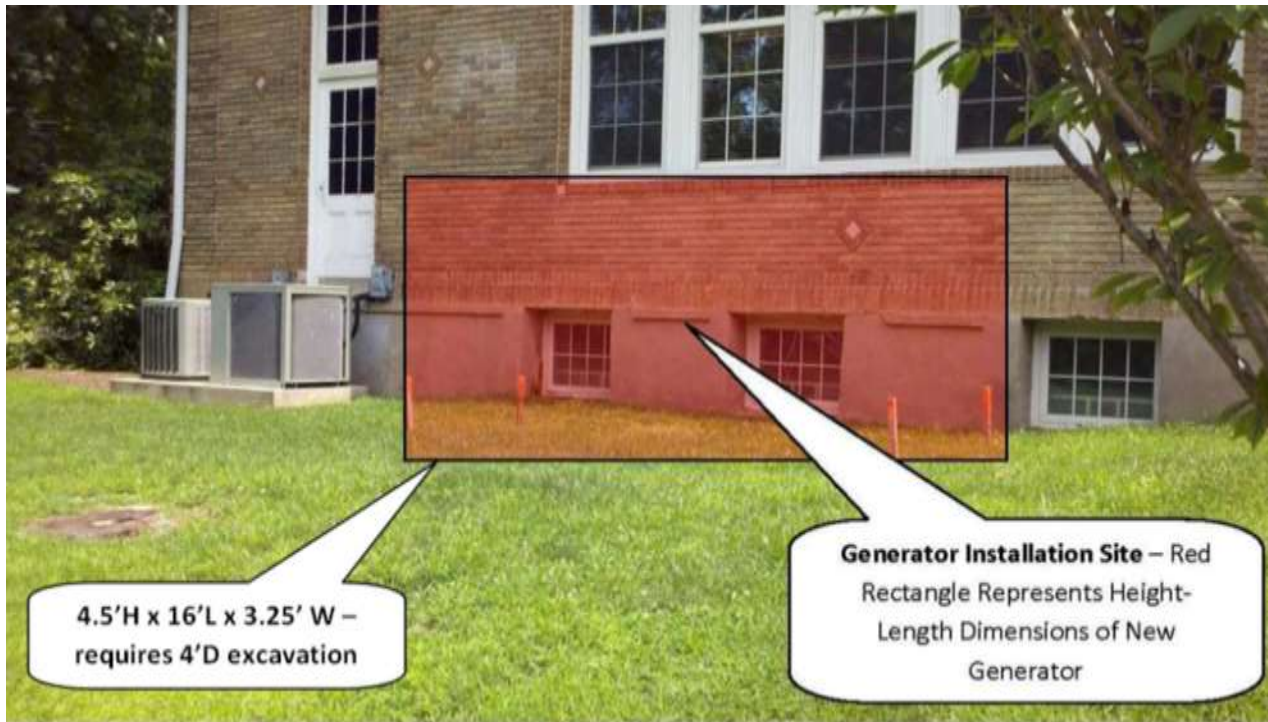


BUT, the text on the photo above is difficult to read, so should have been provided in a text box below the photo



Ground Level Photographs Examples

Captioned Installation Mockup Photos



Ground Level Photographs Examples

Interior Equipment Photographs

This example shows the use of graphic symbols to represent security features planned for a building.

The same symbols are used in the other pictures where the same equipment would be installed at other locations in/on the building.

This example includes the name of the facility and its physical address



The EHP Form: Environmental Documentation*

4. ☐ Environmental documentation

- a. Is there any previously completed environmental documentation for this project at this proposed project site (e.g., Environmental Assessment, or wetland delineation, or cultural/archaeological study)?

☐ Yes ☐ No

- If yes, attach documentation with this form:

☐ Attached

- b. Is there any previously completed agency coordination for this project (e.g., correspondence with the U.S. Fish and Wildlife Service, State Historic Preservation Office, Tribal Historic Preservation Office)?

☐ Yes ☐ No

- If yes, attach documentation with this form:

☐ Attached

- c. Was a NEPA document prepared for this project?

☐ Yes ☐ No

- If yes, what was the decision? (Check one, and please attach):

☐ Finding of No Significant Impact (FONSI) from an Environmental Assessment (EA) or

☐ Record of Decision (ROD) from an Environmental Impact Statement (EIS).

Name of preparing agency:

Date Attached:

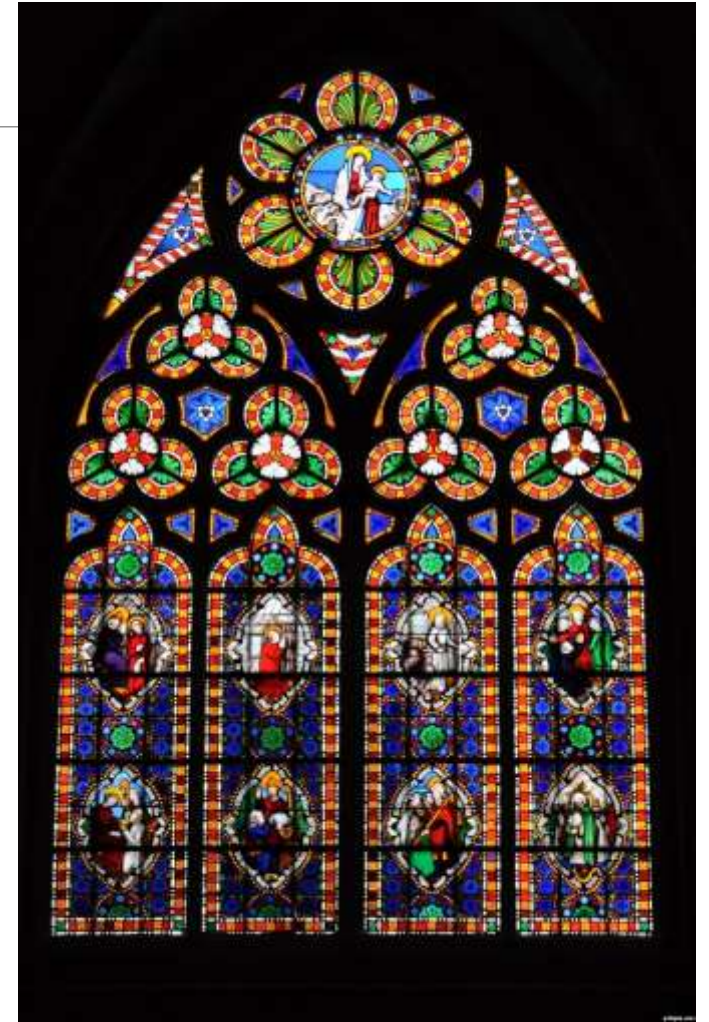
NEPA = National
Environmental Policy Act

*Appendix A has guidance on preparing photographs for the EHP review

EHP Conditions

EHP Conditions

- There are always standard conditions placed on the review of the project
 - Changes of the scope of work requires an additional EHP review
- EHP may put special conditions on a grant to avoid impacts to sensitive resources
- Ignoring these conditions can result in de-obligation of grant funding



Frequently Asked Questions

Question 1: Do I have to do a separate EHP for each project activity?

Answer: No; you will do one EHP for your whole project.

Question 2: My project involves multiple buildings. Do I need to do a separate EHP for each building?

Answer: Generally no; you will do one EHP for your whole project. EXCEPTION – If you were awarded individual grants for the buildings, you will need to complete one EHP per grant award.

Question 3: Until I have a vendor, I may not know the best placement of an item. Do I have to know the exact location where each item will be placed when I submit the EHP?

Answer: No; but hopefully you can come within 2 feet.

Question 4: What if something happens and the item cannot be placed within 2 feet of where we thought it would be located?

Answer: Give the OHS Grants Specialist a call at 573-751-5997 and we will determine the next steps.

Question 5: Can OHS provide technical guidance on our project, such as what type of fencing, fill material, cameras, etc., that should be used?

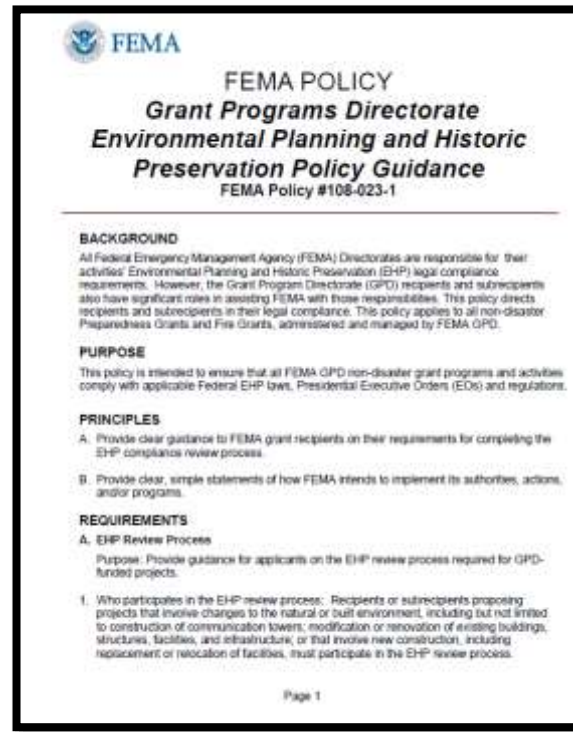
Answer: No; OHS does not have the technical expertise/knowledge to provide guidance in these areas. It is not unusual to see the vendor selection and EHP process go hand-in-hand, so you get the technical advice you need.



Helpful Resources

EHP Policy Guidance

[FEMA Policy: Grant Programs Directorate EHP Policy Guide](#)



EHP Checklist

EHP Checklist

If you answer “Yes” to any question, this indicates the environmental regulation or statute may apply to your project

Environmental Regulation or Statute		Yes	No
National Historic Preservation Act			
1.A	Would the proposed project affect, or is the proposed project in close proximity to, any buildings or structures 50 years or more in age?		
1.B	Will the proposed project involve disturbance of ground?		
Endangered Species Act and Wildlife Coordination Act			
2.A	Are federally listed or endangered species, or their critical habitat, present in or near the project area and, if so, which species are present?		
2.B	Will the proposed project remove or affect vegetation?		
2.C	Is the proposed project in or near (within 200 feet), or likely to affect, any type of waterbody or body of water?		
Clean Water Act, Rivers and Harbors Act			
3.A	Will the proposed project involve dredging or disposal of dredged material, excavation, the addition of fill material, or result in any modification to water bodies or wetlands designated as “waters of the United States” as identified by the U.S. Army Corps of Engineers or on the National Wetland Inventory?		
Executive Order 11988 (Protection of Floodplains) and Executive Order 11990 (Protection of Wetlands)			
4.A	Does a Flood Insurance Rate Map, Flood Hazard Boundary Map, hydrological study, or some other source indicate that the project is located in, or will affect, a 100-year floodplain, a 500-year floodplain (if a critical facility), an identified regulatory floodway, or an area prone to flooding?		
4.B	Is the proposed project located in, or will it affect, a wetland as listed in the National Wetland Inventory?		
4.C	Will the proposed project alter a watercourse, water flow patterns, or a drainage way, regardless of its floodplain designation?		
4.D	Is the proposed project located in, or will it affect, a floodplain or wetland? If yes, the 8-step process summarized in Appendix J must be completed.		
Coastal Zone Management Act			
5.A	Is the proposed project located in the State’s designated coastal zone?		
Farmland Protection Policy Act			
6.A	Will the proposed project convert more than 5 acres of “prime or unique” farmland outside city limits to a non-agricultural use?		
Resource Conservation Recovery Act and Comprehensive Environmental Response, Compensation, and Liability Act			
7.A	Is there reason to suspect there are contaminants from a current or past use on the property associated with the proposed project?		
7.B	Are there any studies, investigations, or enforcement actions related to the property associated with the proposed project?		
7.C	Will any project construction or operation activities involve the use of hazardous or toxic materials?		

FEMA Region 3 EHP Photo Guide

Print guide available at

https://www.fema.gov/sites/default/files/documents/fema_region-3_ehp_photo-guide-2020.pdf

Webinar available at

<https://www.youtube.com/watch?v=8gojF08I1RU>

FEMA Region 3 EHP Photo Guide

Updated June, 2020

In the case of most of the properties in Hazard Mitigation Assistance (HMA) applications, these photographs will be the only and final record of the properties. The National Park Service oversees historic preservation at large in the country has guidelines and expectations on the quality of photographs and documentation as it relates to historic resources. The following information considers those guidelines to ensure that all photographs the Federal Emergency Management Agency (FEMA) submits to State Historic Preservation Officers (SHPOs) are adequate. If you are unclear if a photo is acceptable, refer to this guidance and/or consult Environmental and Historic Preservation (EHP) staff via your HMA Project Manager. Proper photographs following these guidelines will be required in order to complete EHP review and to issue Records of Environmental Consideration (REC). If they are not supplied, there could be a delay in the review.

Photo Composition and Quality DOs and DON'Ts

DOs

General Instructions:

- **DO** make sure each application has review-quality **DIGITAL COLOR** photographs of every property. If possible, please name the photographs appropriately with the address and side of the building using cardinal directions (North, East, South, West).
- **DO** orient photos in LANDSCAPE (horizontal) display if possible. This orientation provides more space for content in photographs.
- **DO** provide JPGs/TIFFs files of photographs. Scans of photographs from appraisal documents or application pages and Google Street View screenshots will not suffice for SHPO review. This can be achieved by submitting the original photographic files directly from the camera/phone.

For Building Related Projects:

- **DO** take photos of all four sides (in their entirety) of the subject buildings in application. Be sure to include outbuildings such as garages, barns, sheds, etc.
 - **DO** make sure there is adequate lighting in photos to ensure features of buildings are legible.
 - **DO** take photos at an angle which gives a clear representation of the building.
 - **DO** include photographs of the surrounding streetscape for each property. This provides context.
-

Questions



OHS Contacts

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