

The purpose of this communication is to clarify the guidance released to the grantees and sub-grantees to complete an Environmental Planning and Historic Preservation (EHP) submission, which can include the Environmental and Historic Preservation Screening Memo (EHPSM) as outlined in Information Bulletin #329.

EHP submissions should be completed and submitted in accordance with IB #329 for the following types of projects:

- Physical security enhancements (i.e., installation of fencing, cameras, TWIC readers, bollards, motion detection systems, x-ray machines, lighting, etc.);
- New installation/construction/renovation (i.e., emergency operations centers, docks, piers, security guard buildings, etc.);
- Renovations/upgrades/modifications to structures 50 years old or older;
- Communication towers, related equipment (i.e., repeaters, antennas, etc.), and equipment shelters;
- Ground disturbing activities (i.e., trenching, excavation, clearing of vegetation, etc.);
- Field based training and exercises including activities that involve ground disturbance, use of explosives, toxic agents or otherwise have the potential to cause impact to the environment or historical resources. This is only a requirement if the exercise or field training is not being conducted by a certified professional or at an existing facility with established procedures.

For example, an EHP submission would not be required for the following field-based actions:

- An explosives training exercise performed by a bomb squad that is occurring at an existing facility with established and approved procedures for that particular proposed action.
- A firefighting exercise performed by firefighters at an existing approved training facility.
- A chemical release training performed by certified/approved professionals that is occurring at an existing facility with established and approved procedures for that particular proposed action.

For example, an EHP submission would be required for the following field-based actions:

- Field exercises proposed that would result in ground disturbance, removal of vegetation, or other land use changes.

- An explosive exercise taking place at an unapproved facility (such as a vacant lot, empty field, vegetated area, etc.).
- Field exercises proposed outside of existing facilities and having no established procedures.
- Purchase of equipment that contains the following notation in the Authorized Equipment List (AEL): This equipment has been identified as requiring an EHP review. Please refer to the EHP Program Page to the right, or consult your designated Program Analyst for guidance on your EHP submission; or
- Any other grant funded project that has the potential to cause environmental or historical impacts.

Please address any questions on this clarification or IB #329 to your FEMA GPD or Regional Program Analyst.