



OREGON DEPARTMENT OF **EMERGENCY MANAGEMENT**

OEM Mitigation Non-Disaster FY2024 BRIC/FMA FEMAGO Environmental Planning & Historic Preservation Review

February 20st, 2025

**Jon Wiebe
Non-Disaster
Team Lead**



FEMAGO Subapplication

Environmental Planning & Historic Preservation (EHP) Review

- **What is it?**
- **Why do we do it?**
- **How and when is it done?**
- **Who does it?**
- **What we need complete it.**
- **EHP process and timelines.**



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What is an EHP Review?

Analysis of pertinent project and location information to determine potential effects to protected EHP resources/considerations:

- All projects funded with federal grant dollars must comply with EHP laws, regulations, and Executive Orders
- EHP review must be completed by FEMA before project initiation
- Recipients must provide FEMA required information to support review



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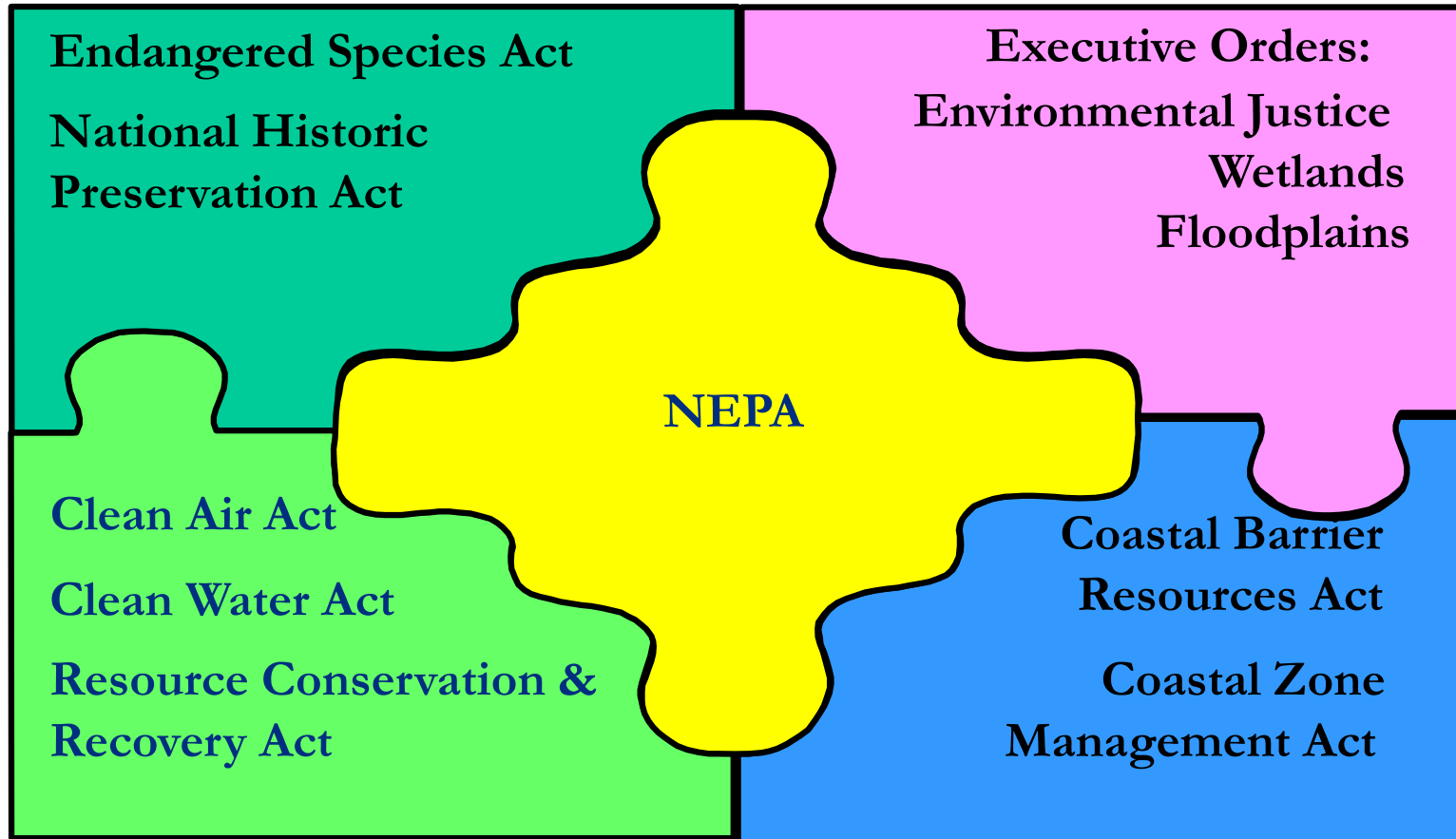
What are EHP considerations?

- Cultural Resources
 - Historic properties
 - Archaeological sites
- Floodplains
- Wetlands
- Vegetation and Wildlife
- Endangered Species
- Coastal Zones
- Water Quality
- Air Quality
- Noise
- Environmental Justice
- Socioeconomic Resources
- Land Use and Agricultural lands
- Hazardous Materials
- Geology (topography, soils)



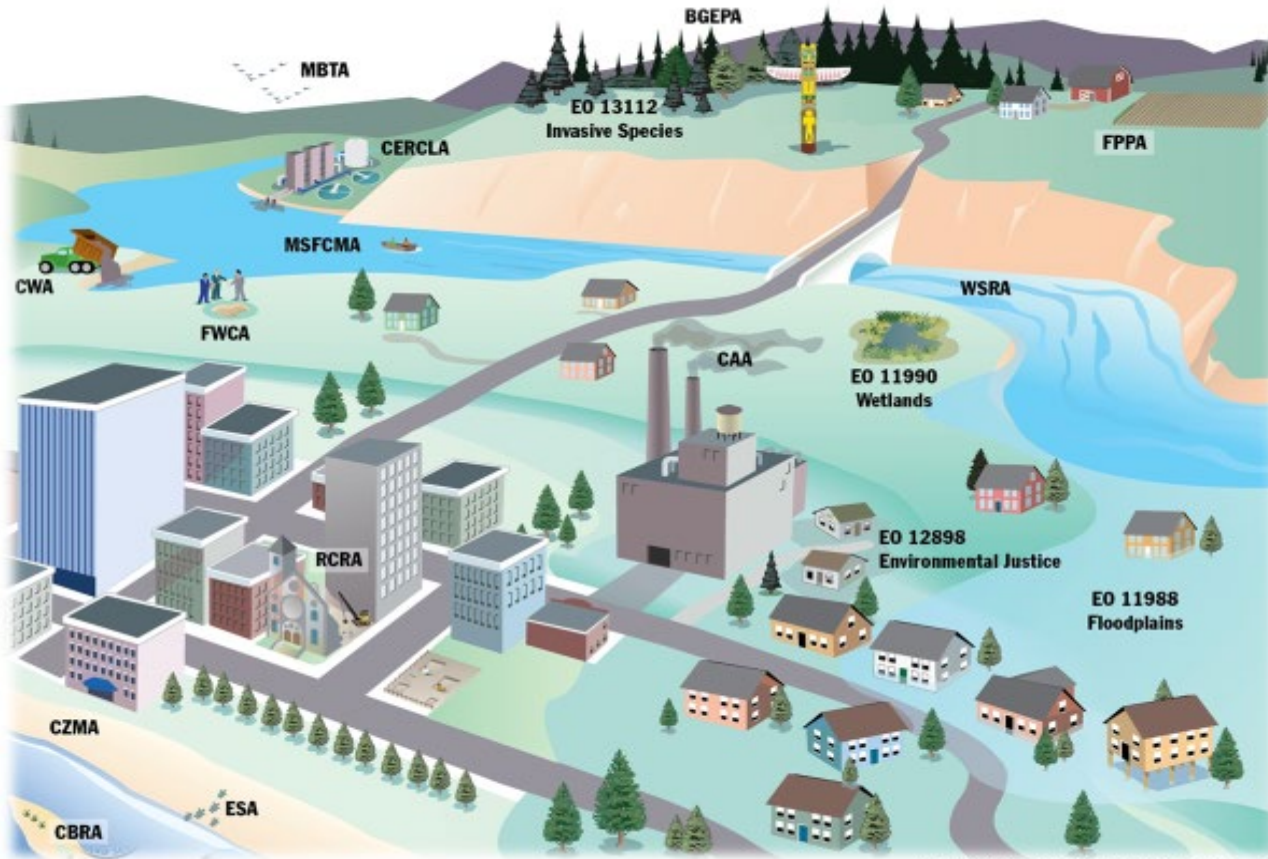
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What are EHP Laws and Executive Orders that form the basis for EHP review?





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EHP Review

- Informed decision-making
- Protect our nation's water, air, coastal, fish and wildlife, agricultural, historical, and cultural resources
- Minimize or avoid potential adverse effects to communities and individuals and investments



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FEMA Role

- FEMA's Office of Environmental Planning and Historic Preservation (OEHP) develops FEMA-wide policy and guidelines.
- The Regional Environmental Officers (REOs) lead the EHP staff in their respective Region.
- Grant programs responsible to ensure EHP review is done for their programs and grants, in collaboration with recipient and subrecipients.



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Projects that Trigger EHP Review

- Facility retrofit that involves new construction
- Repairs/modification/renovation of existing structures
- Physical security enhancements to buildings or structures
- Construction or modification of Communication towers
- All ground disturbances



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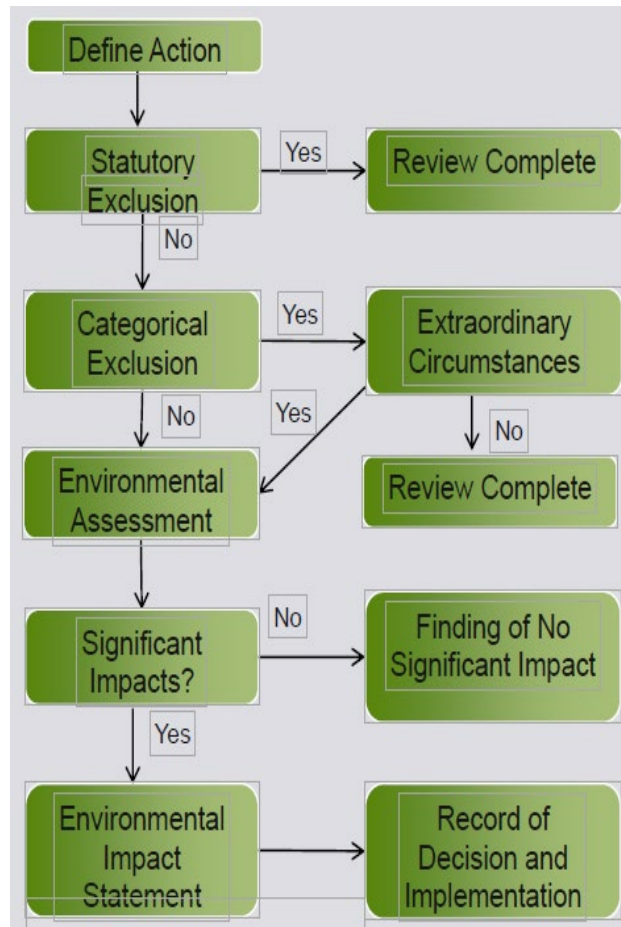
National Environmental Policy Act (NEPA)

- Congressional mandate that before federal agencies make decisions, they must consider the effects of their actions on the quality of the human environment
- Human environment is broadly defined
- NEPA analysis is scaled to project



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NEPA Process Review



NEPA analysis is scaled to project size and impacts:

Statutory Exclusion (STATEX) (Disaster)

Categorical Exclusion (CATEX).

Environmental Assessment (EA)

Finding of No Significant Impact (FONSI)

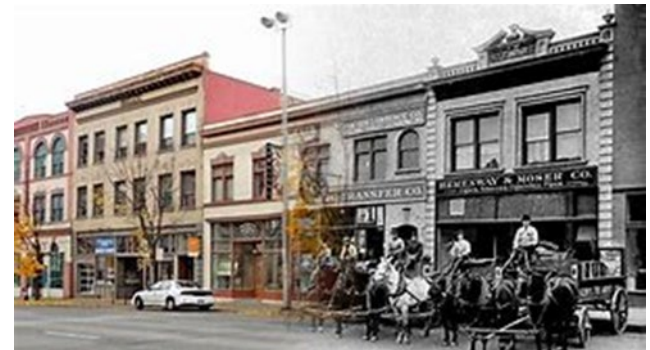
Environmental Impact Statement (EIS)



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Historical Preservation Act

- Requires federal agencies to consider the effects of their actions on historic properties before approving or funding an action.
- Historic Properties include:
 - Buildings and structures
 - Sites, including archaeology cultural landscapes
 - Objects
 - Districts





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NHPA: Section 106 Process

NHPA: Section 106 Process

1

- Initiate Section 106 Process
- Establish Undertaking/Area of Potential Effects

2

- Identify Historic Properties
- Historic Properties or No Historic Properties

3

- Assess Effects to Historic Properties
- No Adverse Effects or Adverse Effects

4

- Resolve Adverse Effects
- Programmatic Agreement, Memorandum of Agreement



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Endangered Species Act

- Work or staging in potential habitats are more likely to trigger consultation, including:
 - Wetlands
 - Water bodies
 - Trees
 - Dunes
 - Undisturbed areas
- ESA applies to everyone, not just federal agencies.
- Protects endangered and threatened species and their critical habitats.
- If there are potential impacts FEMA will consult with US Fish and Wildlife Service or NOAA Fisheries.



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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

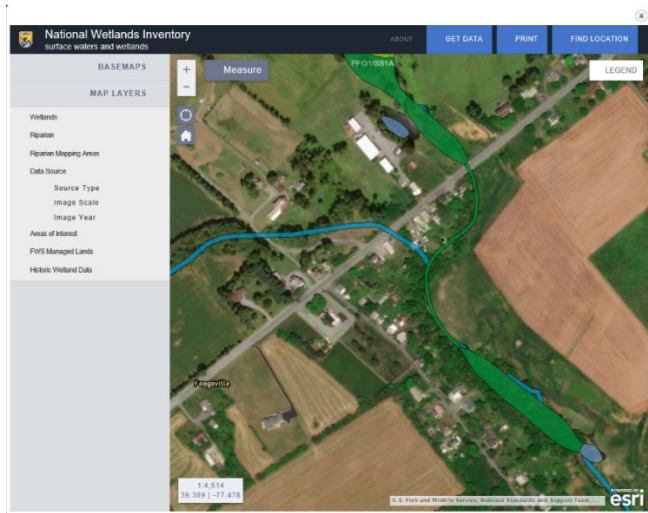
Assess beneficial or adverse effects on floodplains and wetlands

8-step review for impacts



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Location Identification



FWS Wetlands Mapper



FEMA Flood Map Service

IPaC U.S. Fish & Wildlife Service
Last login September 24, 2019 07:29 AM MDT

IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as trust resources) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., migration and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS offices with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and FWS Wetlands) for additional information applicable to the trust resources addressed in that section.

Location
Siskiyou County, California

Local office
Sacramento Fish And Wildlife Office
(916) 444-6600
(916) 444-6713
Federal Building

FWS IPaC



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Resource/Regulatory Agencies



May require coordination with federal/state resource/regulatory agencies, including informal or formal consultation.

[State Historic Preservation Office](#)

[Tribal Governments](#)

[US Fish and Wildlife Service](#)

[US Army Corps of Engineers](#)





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Consequences of Non-Compliance

- Denial of finding
- Project approval delays
- Negative publicity
- Civil penalties
- Lawsuits



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Your Part Supporting the EHP Review

- Applicants and subapplicants must provide all required information to support the process
- Costs of environmental studies (e.g., archeological surveys, biological evaluations) are eligible costs in the grant.



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What EHP Needs to Know

- Scope of Work Narrative
 - Exact location
 - Description & Dimension of area
 - Ground disturbance limits
 - Nearby structures with date of construction
 - Components, materials
 - Equipment types to be used
 - Staging areas
 - Concept plans
- Visual Documentation
 - Maps and Photos
- Other Environmental Documentation
 - Other NEPA documents
 - Consultation with other state and federal agencies



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Scope of Work (SOW)

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.



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Scope of Work (SOW)

Bad

Retrofit Critical
Infrastructure

Good

Retrofit 4 story, 6000 sq ft
structure on 2 ac. vacant lot,
last used for farming. Slab on
grade construction with 4 ft
footers. Site will be graded and
an estimated 2 ft of soil
removed. Utilities will be
installed 2 ft below grade... etc.



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Photos:

Example

1600 Pennsylvania Ave NW,
Washington, DC 20500

N 38.89770, W 77.03652





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Year Built:

Example

Construction began 1792,
completed 1800

Rebuilt 1817, additions in 1824,
1829, 1901

Interior structural renovations 1927,
1946, 1948





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Ground Disturbance:

Example

Example: length, width, and depth of trenching for conduit





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Additional Information:

EHP resources – FIRMs (floodplain maps), wetland maps, protected species information

Prior resource/regulatory agency coordination or consultation documents



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Design Plans, Drawings, Blueprints:

- 60% completion or greater typically informs EHP processes

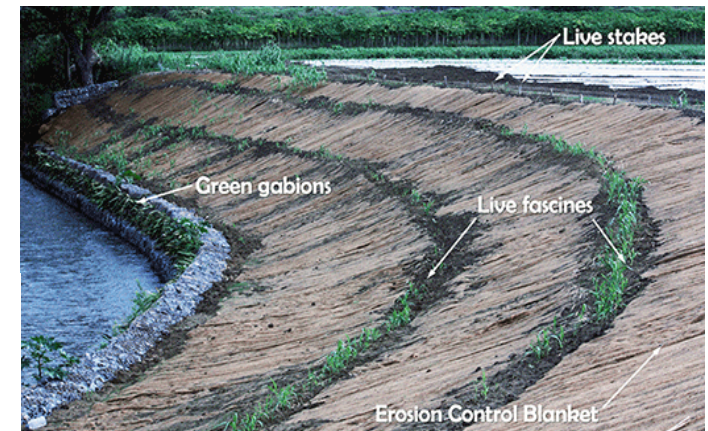
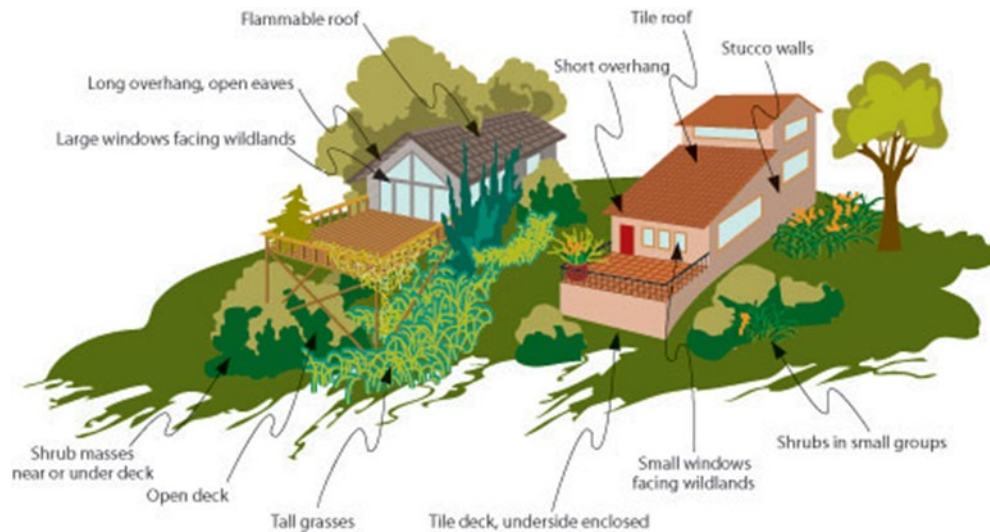




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Design Plans, Drawings, Blueprints:

- Details





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Common Reasons for EHP Delays

- Incomplete information = request for more information (RFI) = project delays
- Poor or absent ground-level photographs
 - Inadequate project description
 - Poor or absent aerial photographs
 - Extent of ground disturbance unclear or not included
 - No project location (physical addresses or latitude-longitude)



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Extenuating Circumstances

- May need EHP site visit
- NHPA consultation required (SHPO and or Tribal), for complex projects consultation may take months
- Memorandum of Agreement is required
- ESA formal consultation required (may take up to several months)
- Environmental assessment is required



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BRIC & FMA View

The screenshot shows a web browser window with the URL <https://go.fema.gov/subApplication/8d297af9-d38e-48b5-b7b8-c79764c473c0/edit#.A.%20National%20Historic%20Preservation%20Act%20-%20Historic%20Buildings%20and%20Structures>. The page title is "OR Regional Water Treatment Plant - Design and Phased Construction" and the status is "Pending submission".

The left sidebar contains a navigation menu with the following items:

- Budget
- Cost-effectiveness
- Environmental/Historic Preservation (EHP) Review Information
- A. National Historic Preservation Act - Historic Buildings and Structures
- B. National Historic Preservation Act - Archeological Resources
- C. Endangered Species Act and Fish and Wildlife Coordination Act
- D. Clean Water Act, Rivers and Harbors Act, and Executive Order 11990 (Protection of Wetlands)
- E. Executive Order 11988 (Floodplain Management)
- F. Coastal Zone Management Act
- G. Farmland Protection Policy Act
- H. Resource Conservation and Recovery Act (RCRA) and Comprehensive Environmental Response Compensation and Liability Act (CERCLA) (Hazardous and Toxic Materials)
- I. Executive Order 12898, Environmental Justice for Low Income and Minority Populations
- J. Other Environmental/Historic Preservation Laws or Issues
- K. Summary and Cost of Potential Impacts
- Evaluation

The main content area displays the "Environmental/Historic Preservation (EHP) Review Information" section, which includes an introduction and three sub-sections:

A. National Historic Preservation Act - Historic Buildings and Structures
Does your project affect or is it in close proximity to any buildings or structures 50 years or more in age?
 Yes
 No
 Not known

B. National Historic Preservation Act - Archeological Resources
Does your project involve disturbance of ground?
 Yes
 No
 Not known

C. Endangered Species Act and Fish and Wildlife Coordination Act
1. Are federally listed threatened or endangered species or their critical habitat present in the area affected by the project?
 Yes



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BRIC & FMA View

OR Regional Water Treatment Plant - Design and Phased Construction Status: Pending submission

OMB number: 1660-0072. Expiration date: 10/31/2021. [View burden statement](#)

Environmental/Historic Preservation (EHP) Review Information

Introduction

An environmental/historic preservation review is required for all activities for which FEMA funds are being requested. FEMA will complete this review with the assistance of both the state or tribal government and the local applicant. It is important that you provide accurate information. If you are having problems completing this section, please contact your application point of contact.

A. National Historic Preservation Act - Historic Buildings and Structures

1. Does your project affect or is it in close proximity to any buildings or structures 50 years or more in age?

Yes

No

Not known

B. National Historic Preservation Act - Archeological Resources

Does your project involve disturbance of ground?

Yes

No

Not known

C. Endangered Species Act and Fish and Wildlife Coordination Act

1. Are federally listed threatened or endangered species or their critical habitat present in the area affected by the project?

Yes

Navigation Menu: Budget, Cost-effectiveness, Environmental/Historic Preservation (EHP) Review Information, A. National Historic Preservation Act - Historic Buildings and Structures, B. National Historic Preservation Act - Archeological Resources, C. Endangered Species Act and Fish and Wildlife Coordination Act, D. Clean Water Act, Rivers and Harbors Act, and Executive Order 11990 (Protection of Wetlands), E. Executive Order 11988 (Floodplain Management), F. Coastal Zone Management Act, G. Farmland Protection Policy Act, H. Resource Conservation and Recovery Act (RCRA) and Comprehensive Environmental Response Compensation and Liability Act (CERCLA) (Hazardous and Toxic Materials), I. Executive Order 12898, Environmental Justice for Low Income and Minority Populations, J. Other Environmental/Historic Preservation Laws or Issues, K. Summary and Cost of Potential Impacts, Evaluation.



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BRIC-FMA FY2024 Sub... | fws wetlands mapper... | fema flood map servic... | fws ipac tool - Search... | About NRCS | Natural... | GitHub - esেকে/ai-for... | FEMAGO - Manage M... | FEMAGO - A National... |

https://go.fema.gov/subApplication/8d297af9-d38e-48b5-b7b8-c79764c473c0/edit#A.%20National%20Historic%20Preservation%20Act%20-%20Historic%20Buildings%20and%20Structures

Ventusky - Wind, Ra... | Hazard Situation Ov... | Bookings with me... | Workday oregon - S... | FEMAGO - Login | FEMA eGrant | FFATA | NEMIS | OEM | BRIC | FMA | FEMA | eCFR | HR Stuff | Training | Other favorites

FEMAGO | Grants | Organizations | Grant/Subgrant ID | Jon Wiebe

A. National Historic Preservation Act - Historic Buildings and Structures

1. Does your project affect or is it in close proximity to any buildings or structures 50 years or more in age?

Yes

Please confirm that you have provided the information listed below by selecting each check box. (If you have not provided these documents in any other section of the application, please attach the required documents below.)

- The property address and original date of construction for each property affected (unless this information is already noted in the Properties section).
- A minimum of two color photographs showing at least three sides of each structure (Please label the photos accordingly).
- A diagram or USGS 1:24,000 scale quadrangle map displaying the relationship of the property (s) to the project area.

To help FEMA evaluate the impact of the project, please indicate any other information you are providing in the attachments or comment section below: (optional)

- Information gathered about potential historic properties in the project area, including any evidence indicating the age of the building or structure and presence of buildings or structures that are listed or eligible for listing on the National Register of Historic Places or within or near a National Register listed or eligible historic district. Sources for this information may include the State Historic Preservation Officer, and/or the Tribal Historic Preservation Officer (SHPO/THPO), your local planning office, historic preservation organization, or historical society.
- Consideration of how the project design will minimize adverse effects on known or potential historic buildings or structures, and any alternatives considered or implemented to avoid or minimize effects on historic buildings or structures. Please address and note associated costs in your project budget.
- For acquisition/demolition projects affecting historic buildings or structures, any data regarding the consideration and feasibility of elevation, relocation, or flood proofing as alternatives to demolition.
- Attached materials or additional comments.

Please provide an explanation and any information about this project that could assist FEMA in its review. (optional)

No
 Not known

Attachments

Attach a document

Filename	Date uploaded	Uploaded by	File size	Description	Action
Maximum File Size: 1 GB					



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EHP Review Expectations

- Region EHP staff reviews subapplication
- Most projects have simple review
- Complex projects likely to require additional information along with site visit, coordinated with Region and OEM staff and sub-applicant on this
- Once EHP review complete Region Mitigation is notified, proceeds with review pending award.



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EHP Outcomes

- ❑ EHP may put conditions on a grant to avoid potential impacts to sensitive resources
- ❑ Ignoring these conditions can result in de-obligation of grant funding
- ❑ It's important to ensure subrecipients understand EHP conditions

10/30/2019 18:30:33 FEDERAL EMERGENCY MANAGEMENT AGENCY REC-01
 RECORD OF ENVIRONMENTAL CONSIDERATION (REC)

Project 2019-1A-0001 (0602)
 Title: Powell OH Zoo & Aquarium Security

Environmental Law/ Executive Order	Status	Description	Comment
Fish and Wildlife Coordination Act (FWCA)	Completed	Project does not affect, control, or modify a waterway/body of water - Review concluded	
Migratory Bird Treaty Act (MBTA)	Completed	Project located within a flyway zone	
Magnuson-Stevens Fishery Conservation and Management Act (MSA)	Completed	Project does not have potential to take migratory birds - Review concluded	
National Historic Preservation Act (NHPA)	Completed	Project not located in or near Essential Fish Habitat - Review concluded	
Wild and Scenic Rivers Act (WSRA)	Completed	Not type of activity with potential to affect historic properties - Review concluded	Existing building, oldest (the tunnel) built in 1955 and enlarged in 1965. Rest of the building built year are 1991 thru 2014. Not in a historic district and not in the vicinity of a NHPA-listed resource or eligible historic district or property. Fred Polycross, SO-qualified FEMA staff, determined that the undertaking with no ground disturbance has no potential to affect historic properties. - Jereva - 10/30/2019 14:22:38 GMT

CONDITIONS

Special Conditions required on implementation of Projects:
 All equipment in Area 1 and Area 3 which are in Flood Zone A to be installed above BFE.
 Source of condition: Executive Order 11988 - Floodplains Monitoring Required: No

Standard Conditions:
 Any change to the approved scope of work will require re-evaluation for compliance with NEPA and other Laws and Executive Orders.

This review does not address all federal, state and local requirements. Acceptance of federal funding requires recipient to comply with all federal, state and local laws. Failure to obtain all appropriate federal, state and local environmental permits and clearances may jeopardize federal funding.

If ground disturbing activities occur during construction, applicant will monitor ground disturbance and if any potential archeological resources are discovered, will immediately cease construction in that area and notify the State and FEMA.

CONDITIONS

Special Conditions required on implementation of Projects:
 Installation of the system hardware shall not damage or cause the removal of character-defining architectural features and shall be removable in the future without impacts to significant architectural features. Wireless devices will be utilized when possible. Mounting brackets will not be drilled into brick, stone, or other architectural surfaces but instead into the mortar or other joints.

Source of condition: National Historic Preservation Act (NHPA) Monitoring Required: No

Standard Conditions:
 Any change to the approved scope of work will require re-evaluation for compliance with NEPA and other Laws and Executive Orders.

This review does not address all federal, state and local requirements. Acceptance of federal funding requires recipient to comply with all federal, state and local laws. Failure to obtain all appropriate federal, state and local environmental permits and clearances may jeopardize federal funding.

If ground disturbing activities occur during construction, applicant will monitor ground disturbance and if any potential archeological resources are discovered, will immediately cease construction in that area and notify the State and FEMA.

Special Conditions required on implementation of Projects:

EO 11988 CONDITION: Subgrantee must obtain floodplain permit or approval from the local floodplain administrator before work begins.

Source of condition: Executive Order 11988 - Floodplains Monitoring Required: No



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EHP Review

- FEMA's EHP Review is required by Federal laws, regulations and Executive Orders
- Must be complete before FEMA can fund any project
- Purpose of EHP Review is to ensure compliance - not to deny projects
- Sometimes projects may need to be modified to minimize impacts
- Cooperation in the process is essential.

Online Resources

[Environmental & Historic Preservation Grant Preparation Resources | FEMA.gov](#)

[Environmental & Historic Preservation Grant Preparation Resources | FEMA.gov](#)



State of Oregon Department of Emergency Management (OEM) EHP Compliance Guide for FEMA Grant Subapplicants

Introduction

This guide, created by the State of Oregon Department of Emergency Management (OEM), is intended to assist EHP grant subapplicants in completing the Environmental and Historic Preservation (EHP) compliance requirements for FEMA grant applications. It provides information on the requirements and steps for completion of the EHP compliance requirements for FEMA grant applications.

Definition: EHP compliance requirements apply to all FEMA grant projects and subapplicants of the subapplicants that are subapplicants of the OEM. This includes all subapplicants of the OEM, including subapplicants of the OEM that are subapplicants of the OEM.

Section A: National Historic Preservation Act (NHPA)

1. **Section A: National Historic Preservation Act (NHPA)** - Identify potential historic sites in your project area.
2. **Section B: National Historic Preservation Act (NHPA)** - For projects involving ground disturbance, the subapplicant must complete a National Historic Inventory (NHI) and a National Historic Inventory Worksheet (NHIS).
3. **Section C: National Historic Preservation Act (NHPA)** - Complete a National Historic Inventory Worksheet (NHIS) for each historic site identified in the NHI.
4. **Section D: National Historic Preservation Act (NHPA)** - Complete a National Historic Inventory Worksheet (NHIS) for each historic site identified in the NHI.
5. **Section E: National Historic Preservation Act (NHPA)** - Complete a National Historic Inventory Worksheet (NHIS) for each historic site identified in the NHI.



FEMA