

EHP - Environmental and Historic Preservation Overview

EHP Review Guidance for BRIC Subapplicants


Welcome and Introductions

- MEMA
- Maryland Environmental Service
- Communities

Agenda

- Introduction to EHP - What is it & Why is it Required
- EHP Laws & Executive Orders
- Important of EHP Compliance
- EHP Review Roles & Responsibilities
- EHP Application Resources
- Considering EHP Impacts on Projects
- Photography Guidance
- Tips for a Smooth Review
- Additional Resources
- Questions

Executive Order 12372 Process?

Subapplicant information	
Name of federal agency	FEMA
Type of submission	<input type="checkbox"/> Pre-application <input type="checkbox"/> Application <input type="checkbox"/> Changed/ Corrected application
* Type of Subapplicant	<input type="checkbox"/> State Government <input type="checkbox"/> Local Government <input type="checkbox"/> Indian Tribal Government <input type="checkbox"/> Special Governmental District <input type="checkbox"/> Private Non-Profit <input type="checkbox"/> Other
* Is Subapplication subject to review by Executive Order 12372 Process?	<input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No, program is not covered by E.O. 12372 <input type="checkbox"/> No, program has not been selected by state for review
If Yes, this preapplication/ application was made available to the Executive Order 12372 Process for review on: (MM-DD-YYYY)	11/22/2020
* Is the Subapplicant delinquent on any Federal debt?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<i>If yes, please provide an explanation:</i>	

Executive Order 12372, "Intergovernmental Review of Federal Programs," was issued with the desire to foster the intergovernmental partnership and strengthen federalism by relying on State and local processes for the coordination and review of proposed Federal financial assistance and direct Federal development.

When beginning your FEMA GO application, please check "Yes" to this question and use "11/22/2020" as the date.

Getting Started with EHP Review

- The EHP section does not apply to CCB Projects.
- Pre-Award Costs may include preparation of EHP documentation for awarded projects.
- Projects involving changes to a structure or site may involve a higher level of environmental & historic preservation review. Projects involving new ground disturbance are evaluated for potential impact to archaeological resources and wildlife habitat.
- A “Yes” answer to any of the EHP questions does not mean that the project will not be funded, only that special issues must be reviewed and resolved in a satisfactory manner prior to obligation of funds.
- Subapplicants must provide all relevant EHP materials with FEMA GO submission.

What Is the EHP Review?

- It is the Federal Emergency Management Agency's (FEMA) policy to integrate environmental planning and historic preservation (EHP) considerations into its hazard mitigation, disaster response and recovery, and emergency preparedness activities.
- FEMA, through its EHP Program, engages in a review process to ensure that FEMA-funded activities comply with various Federal EHP laws and Executive Orders (EOs).
- The goal of these compliance requirements is to protect the nation's water, air, coastal, wildlife, agricultural, historical and cultural resources, as well as to minimize potential adverse effects to children and to low-income and minority populations.

What is NEPA?

- The National Environmental Policy Act of 1969 (NEPA) requires that the Federal government examine the proposed impacts of its actions before project implementation.
- “NEPA” forms a framework for the coordination and demonstration of compliance with any study, review, or consultation required by other environmental laws. For example, the need to comply with another environmental law, such as the Clean Water Act, may be identified within the framework of the NEPA process, but NEPA itself is not the source of the obligation. If, theoretically, the requirement to comply with NEPA were removed, compliance with each applicable law would still be required.
- State, local, or Tribal processes cannot replace NEPA compliance. However, materials prepared for other entities, like the State Historic Preservation Office, can be submitted with the EHP Review materials in FEMA GO.
- NEPA compliance has always been included in the special conditions of the grant award and the grant guidance.

Environmental Laws and Executive Orders

National Environmental Policy Act (1969), NEPA

Biological Laws:

- Endangered Species Act (1973), ESA
- Fish and Wildlife Coordination Act (1934), FWCA
 - Migratory Bird Treaty Act (1918), MBTA
- Bald and Golden Eagle Protection Act (1940), BGEPA
- Magnuson-Stevens Fishery Conservation Act (2006), FCA
 - EO 13112 Invasive Species (1999)

Water Resources Laws:

- EO 11988 Floodplain Management (1977)
- EO 11990 Protection of Wetlands (1977)
 - Clean Water Act (1972), CWA
- Wild and Scenic Rivers Act (1968), WSRA

Socioeconomic Laws:

- Farmland Protection Policy Act (2007), FPPA
 - EO 12898 Environmental Justice (1994)

Pollution Control and Debris Management:

- Clean Air Act (1970), CAA
- Resource Conservation and Recovery Act (1976), RCRA
 - Comprehensive Environmental Response, Compensation and Liability Act (1990), CERCA

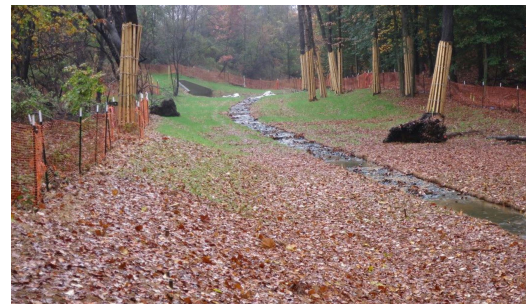
Historic Properties:

- National Historic Preservation Act (1966), NHPA

It's Required – But Why Go Through The Trouble?



- Improve projects where possible
- Identify issues early and avoid impacts
- Plan for additional budget costs
 - It's the law
 - Retain funding



EHP REVIEW ROLES AND RESPONSIBILITIES

Subapplicant	MEMA	FEMA
<p>Uses EHP Screening Form & Checklist to identify applicable regulations based on the proposed project description and location</p> <p>Develops the appropriate materials for EHP review (maps, photos, drawings, materials)</p> <p>Completes EHP section of subapplication in FEMA GO with all necessary attachments</p>	<p>Reviews application package for completeness to ensure necessary environmental review information and documentation is included</p> <p>Initiates State Clearinghouse project submission & coordinates with State agencies as needed</p> <p>Submits all State subapplications and associated EHP documentation to FEMA</p>	<p>Ensures project complies with federal laws and executive orders</p> <p>Conducts site inspections with the State, as needed</p> <p>Provides technical assistance to the State and subapplicant, if necessary</p> <p>Coordinates consultations with other federal agencies, if necessary</p>

Application Resources: EHP Screening Form

- The EHP Screening Form is a questionnaire used by FEMA to facilitate the environmental and compliance review for your project(s) and determine which regulations are applicable to the project.
- The screening form and associated materials may be included as an attachment to the subapplication in FEMA GO.
- Completing the screening form is not a substitute for answering questions within the EHP section in FEMA GO; the screening form and attachments provide supporting material to positively answered questions within the subapplication.
- The form provides technical guidance for supplemental documentation including guidance for supporting photographs for project submissions.
- All projects are assessed under NEPA and the NHPA regardless of the scope of work.

Information for the EHP Screening Form

- Project Location: Physical address of structure/facility or lat/long (GPS coordinates) if no address is available;
Project location map (aerial)
- Point of Contact
- Date the structure(s) involved was constructed
- Detailed scope of work: What you are doing, where you are doing it, and how you are doing it
- Clearly labeled color photographs (ground-level) showing the exact location of activities
- Ground Disturbances: Dimensions/acreage/square footage of structure and/or land affected
- Project site map with areas and activities labeled including any equipment or material staging areas
- Design drawings, if possible, showing where equipment will be installed or for construction activities

Application Resources: Tools & Information Sheet

BRIC and FMA SUBAPPLICANT TOOLS AND INFORMATION

General Information

MARYLAND EMERGENCY MANAGEMENT AGENCY (MEMA)
<https://mema.maryland.gov/community/Pages/Mitigation.aspx>

FEMA BRIC GRANT TECHNICAL INFORMATION

BRIC program information
<http://www.fema.gov/grants/mitigation/building-resilient-infrastructure-communities>

BENEFIT COST ANALYSIS (BCA) TOOLKIT AND TECHNICAL INFORMATION

Pre-calculated analyses for eligible project types (Source: FEMA)
<https://www.fema.gov/grants/guidance-tools/benefit-cost-analysis>

FEMA GO reference tools

 (Source: FEMA)

<https://www.fema.gov/grants/guidance-tools/fema-go/hazard-mitigation-grants>

Community information

NRIP CIDR
<https://www.fema.gov/cis/MD-pdf>

LEGISLATIVE DISTRICT
https://mdpgis.mdp.state.md.us/legis_District/index.html

CONGRESSIONAL DISTRICT
<https://planning.maryland.gov/redistricting/Pages/2010/congDist.aspx>

FIREWISE
<https://www.nfpa.org/Public-Education/Fire-causes-and-risks/Wildfire/Firewise-USA/Firewise-USA-Resources/Firewise-USA-sites/State-listing-of-participants>

Mitigation Plan Information

HAZARD MITIGATION PLAN RESOURCES AND CONSIDERATIONS FOR GRANT SUBAPPLICANTS (FEMA)

<https://www.fema.gov/emergency-managers/risk-management/hazard-mitigation-planning/create-hazard-plan>

HAZARD MITIGATION PLAN STATUS (MEMA)

<https://maryland.maps.arcgis.com/apps/Embed/index.html?appid=63ca4db077b3457db6c57312e9b4e977>

Scope of Work Development Tools

INFORMATION AND DIGITAL TOOLS TO HELP IDENTIFY AND ADDRESS CLIMATE RISKS (Source: National Oceanic and Atmospheric Administration)
<https://toolkit.climate.gov/>

GUIDANCE FOR DETERMINING CURRENT AND FUTURE FLOOD RISK based on preliminary Digital Flood Insurance Rate Maps (DFIRMs)
Direct link to DFIRMs: <https://mdfloodmaps.net/>

FEMA FLOOD MAP SERVICE CENTER
<https://msc.fema.gov/portal/home>

COMMUNITY LIFELINES (FEMA)

<https://www.fema.gov/emergency-managers/practitioners/lifelines>

MAPPING INFORMATION PLATFORM (MIP) STUDIES TRACKER: The MIP Studies Tracker includes footprints of all study projects and project-relevant information from FEMA's Mapping Information Platform (Source: FEMA)

<https://www.arcgis.com/home/webmap/viewer>

Hazard Identification

FLOOD INUNDATION MAPPING (FIM) PROGRAM: Online flood inundation map library includes maps that show where flooding may occur over a range of water levels in the community's local stream or river. The site also provides online access to flood inundation maps along with real-time streamflow data, flood forecasts, and potential loss estimates. (Source: USGS)
<https://www.usgs.gov/mission-areas/water-resources/science/flood-inundation-mapping-fim-program>

NATIONAL WATER INFORMATION SYSTEM: This interface provides a map view of the locations of sites with USGS water data.
<https://maps.waterdata.usgs.gov/mapper/index.html>

COASTAL CHANGE HAZARDS PORTAL: Interactive access to coastal change science and data for the nation's coasts.
<https://marine.usgs.gov/coastalchangehazardsportal>

Environmental / Historic Preservation (EHP) Review Information

HISTORIC PRESERVATION-SPECIFIC RESOURCES (Source: State of Maryland)
Maryland Department of Assessments & Taxation: Verify location, ownership, construction date, map, and tax parcel.
<https://sdot.dat.maryland.gov/RealProperty/Pages/default.aspx>

Maryland Historic Preservation Information: Designations, existing surveys, prior Determinations of Eligibility determinations (MEDUSA)
<https://mhpm.maryland.gov/secure/mehsa/>

MULTI-USE INFORMATIONAL TOOLS APPLICABLE TO THE FOLLOWING SECTIONS:

- **Endangered Species Act**
- **Fish and Wildlife Coordination Act**
- **Clean Water Act**
- **Rivers and Harbors Act**
- **Executive Order 11990 (Protection of Wetlands)**
- **Executive Order 11988 (Floodplain Management)**
- **Coastal Zone Management Act**
- **Farmland Protection Policy Act**

MERLIN: Maryland Environmental Resource & Land Information Network (Source: State of Maryland)
<https://apps.mdp.state.md.us/MERLIN/index.html>

National Wetlands Inventory (Source: U.S. Fish and Wildlife Service)
<https://www.fws.gov/wetlands/data/mapper.html>

Essential Fish Habitat (EFH) Mapper: Online mapping application is to provide the public and other resource managers an interactive platform for viewing a spatial representation of EFH or those habitats that NMFS and the regional fish management councils have identified and described as necessary to fish for spawning, breeding, feeding, or growth to maturity.
https://www.habitat.noaa.gov/protect/efh/efh_mapper/index.html

Maps, GIS data, and metadata for designated Critical Habitat in each NOAA Fisheries Region

https://www.fisheries.noaa.gov/resources/maps?filter=critical%20habitat&field_management_area_value%3BMid-Atlantic%25Mid-Atlantic%25field_specie_vocab_target%20=sort_by=created

Find Endangered Species: (Source: U.S. Fish and Wildlife Service)
<https://www.fws.gov/endangered/>

Coastal Change Hazards Portal: Interactive access to coastal change science and data for the nation's coasts.
<https://marine.usgs.gov/coastalchangehazardsportal/>

Flood Inundation Mapping (FIM) Program: Online flood inundation map library includes maps that show where flooding may occur over a range of water levels in the community's local stream or river. The site also provides online access to flood inundation maps along with real-time streamflow data, flood forecasts, and potential loss estimates. (Source: USGS)
<https://www.usgs.gov/mission-areas/water-resources/science/flood-inundation-mapping-fim-program>

• **Resource Conservation and Recovery Act (RCRA)**

• **Comprehensive Environmental Response Compensation and Liability Act (CERCLA) (for hazardous and toxic materials)**

Maryland's program for the regulatory oversight of hazardous waste, policies, and regulations. (Source: Maryland Department of the Environment)
<https://mda.maryland.gov/programs/LAND/Pages/index.aspx>

Cleanups in My Community: Online tools that enable you to map and list hazardous waste cleanup locations and grant areas, and drill down to details about those cleanups and grants and other related information. (Source: EPA)
<https://www.epa.gov/cleanups/cleanups-my-community>

• **Executive Order 12898, Environmental Justice for Low Income and Minority Populations**

Economic Characteristics for Maryland from the American Community Survey (Source: U.S. Census Department of Planning)
<http://mdpgis.mdp.state.md.us/ACS/multi-year/index.html>

Neighborhoods at Risk: See where flooding, urban heat, and hurricanes impact the most vulnerable people. Map and explore information at the neighborhood level for every community in the U.S. Find climate projections for temperature and precipitation. (Source: Headwaters Economics via NOAA Climate Toolkit)
<https://headwatersconomics.org/hppp/neighborhoods-at-risk/>

Evaluation

NATIONAL FLOOD INSURANCE PROGRAM COMMUNITY RATING SYSTEM: Eligible communities list, effective October 1, 2020.
<https://www.fema.gov/flood-insurance/rules-legislation/community-rating-system>

HAZARD MITIGATION ASSISTANCE GRANTS: Find prior grant award application and status of recent awards (Source: FEMA)
<https://www.fema.gov/grants/mitigation>

COOPERATING TECHNICAL PARTNERS PROGRAM (Source: FEMA)
<https://www.fema.gov/flood-maps/guidance-partners/cooperating-technical-partners>

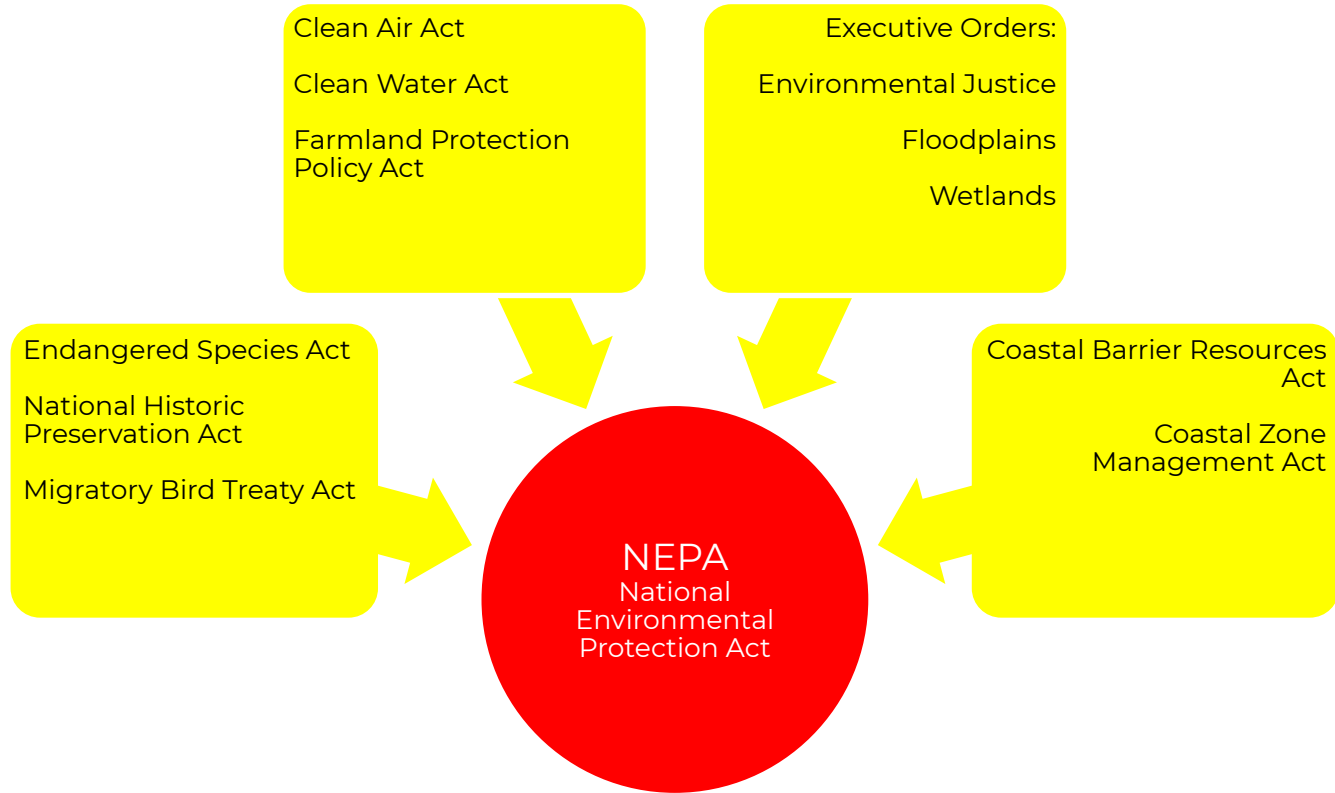
BUILDING CODE EFFECTIVENESS GRADING SCHEDULE (BCEGS) (Source: ISO)
<https://www.iso.net/igatn/compliance-text/The20Building%20Code%20Effectiveness%20Rating%20Issued%20June%2014%2014/hazards>

Location Tools

MARYLAND FINDER ONLINE: Locate a property by address, ZIP code, or area of interest. Information can be accessed, attribute data extracted, and area maps generated in a variety of formats. (Source: Maryland Department of Planning)
<https://apps.planning.maryland.gov/finderonline/>

<https://mema.maryland.gov/community/Documents/Mitigation%20Professionals/BRIC-FMA-Applicant-Tools-Sheet.pdf>

EHP Laws and Executive Orders: The Basis for FEMA's EHP Review



National Historic Preservation Act - NHPA (always applicable)

INTENT: Federally funded projects shall consider project impacts to resources eligible for listing or listed on the National Register of Historic Places (includes archaeological sites).

Information Requirements:

- Date of construction for each building in the project
- Diagram or quadrangle map
- Consultation letter or other information about potential historic or archaeological properties in the project area
- Area of ground disturbance
- Past uses of the disturbed area

Any historic buildings or structures that may be affected by a mitigation project must be named in the subapplication. Historic structures more than 50 years of age include more than buildings; they include historic districts and any object of historic importance.

If a project will affect archeological resources, the resource must be named in the subapplication. Be aware that because known archeological resources may be considered sensitive information, a SHPO or THPO may relate concerns but may not supply details.

Endangered Species Act and Fish and Wildlife Coordination Act (as applicable)

INTENT: Federally funded projects shall seek to avoid adversely affecting threatened and endangered species and their critical habitat.

Information Requirements:

- Consultation letter or other information about threatened or endangered species in the project area
- Information about threatened or endangered species or bodies of water in the project area and the potential of the project to impact those species
- Site map

The timing of construction for some projects may coincide with critical nesting or migration patterns of endangered species and wildlife. In these cases, delaying construction until after these periods may mitigate the potential impact, and this timeframe can be incorporated in the project schedule.

Clean Water Act, Rivers and Harbors Act, and Executive Order 11990 (Protection of Wetlands) (as applicable)

INTENT: Protect the nation's water resources. Together, they support the navigability of the nation's waterways, control proposed development on or around navigable channels, and clean and maintain the water quality of the nation's waters.

Information Requirements:

- Topographic map or image
- Wetlands map
- Consultation letter or other information about wetlands or waters of the U.S. in the project area

The Clean Water Act also has a permitting system under the direction of the U.S. Army Corps of Engineers. Any wetlands that may be affected by the project must be shown in the subapplication. For example, the proposed design for a drainage improvement project may destroy or impair a wetland area.

Executive Order 11988 - Floodplain Management (as applicable)

INTENT: Federally funded projects shall avoid adverse impacts associated with the occupancy and modification of floodplains wherever there is a practicable alternative.

Information Requirements:

- Maps showing floodplains and floodway designations in the project area
- Documentation of probable floodplain management impacts in the project area

Executive Order 11988 is separate from the National Flood Insurance Program (NFIP); however, the floodplain maps and information produced for the NFIP are excellent resources to use for estimating impacts to floodplains. Floodplains, floodways, drainage ways, watercourses, etc. within proximity of the project location must be shown. There is a good possibility that the project area of a flood mitigation project will be located within a regulated floodplain area. Even though flood mitigation projects will result in reduced flood risk to structures or an area, floodplain management requirements must still be followed.

Example - EHP Considerations for Elevation Projects

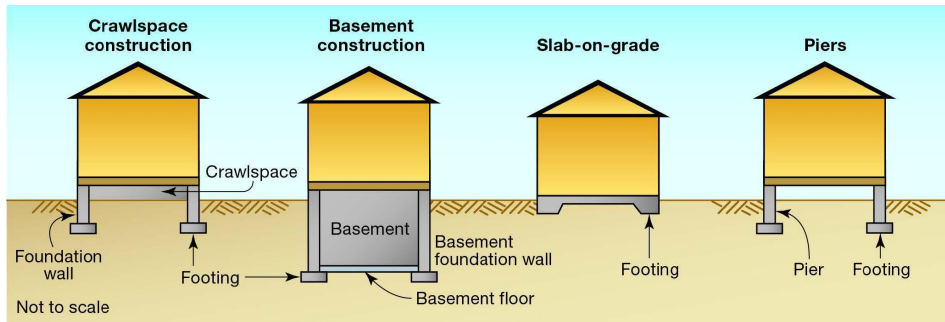
The checklist below describes project information that FEMA requires in order to complete EHP review of a structure elevation project.

Location	State the location of the project, including both the site address and latitude/longitude in decimal degrees (e.g., 38.5342° N,-77.0212° W). Provide any maps (including Flood Insurance Rate Map) with project site clearly marked, aerial imagery, or drawings showing the location of the properties to be elevated.
Description of Project; Scope of Work	Provide a scope of work for the project, including plans for the type of elevation, any planned demolition, level of ground disturbance, extent of vegetation removal, and any fill to be used. Specific design information will be required should EHP review identify potential adverse effects on buildings listed in or eligible for the National Register, either individually or as part of a district.
Age of Existing Buildings	Provide the original date of construction for any buildings or structures located on the list of proposed properties to be elevated.
Photographs	Submit clear, color photographs of each of the buildings to be elevated, including one photo for each side of the building. Also provide color photographs of the surrounding neighborhood taken from the site of buildings to be elevated.
Additional Information	Include copies of other relevant information, such as environmental site assessments and remediation reports, historic property designations or surveys, including any archaeological surveys.
Considering EHP Impacts	Structure elevation projects generally fall under FEMA's list of Categorical Exclusions that require minimal documentation to comply with NEPA, but compliance with other laws and regulations such as the Endangered Species Act, NHPA, Clean Water Act, and Executive Orders 11988 and 11990 is required.

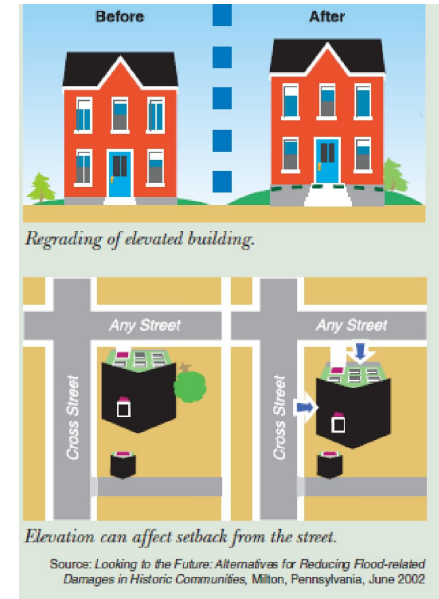
Example - NHPA Considerations for Elevation Projects

NFIP floodplain management requirements contain provisions that provide relief from the elevation requirement for historic properties located in Special Flood Hazard Areas. However, if the applicant and owner decide to proceed with elevation of a historic property, they must meet the requirements of the NHPA.

Because elevation may alter the appearance and scale of a historic building and redefine its relationship to its setting, it may have a negative impact on a building's character defining features. When planning the elevation of flood-prone structures, FEMA advises communities to consider utilizing appropriate design, materials, and landscaping to avoid adverse effects to historic properties.



By adhering to the *Secretary of the Interior's Standards for the Treatment of Historic Properties* and by minimizing elevation, a building's original historic setting, scale, and distinctive features may be preserved which will reduce the project's likelihood to have potential adverse effects.



Example - EHP Considerations for Acquisition & Demolition Projects

The checklist below describes project information that FEMA requires in order to complete EHP review of acquisition & demolition projects.

Location	State the location of the project, including both the site address and latitude/longitude in decimal degrees (e.g., 38.5342° N,-77.0212° W). Provide any maps (including the Flood Insurance Rate Map) with project site marked clearly, aerial imagery, or drawings showing the location of the properties to be acquired.
Description of Project; Scope of Work	Provide a scope of work for the project, including plans for demolition, level of ground disturbance, extent of vegetation removal, and grading plans. The information needs to be sufficient to provide a clear picture of the scope of the action being reviewed.
Age of Existing Buildings	Provide the date of construction for any buildings or structures located on the site(s) to be acquired.
Photographs	Provide clear, color photographs of each of the buildings to be acquired, including one photo for each side of the building. Also include color photographs of the surrounding neighborhood taken from the acquisition site. Clearly label photographs with the location and orientation of the camera relative to the property to be acquired.
Additional Information	Include copies of other relevant information, such as environmental site assessments and remediation reports, historic property designations or surveys, or archaeological surveys.
Considering EHP Impacts	While acquisition/demolition projects are most likely to impact historic properties, State and local governments must also consider Federal, State, and local laws that relate to their projects' effects on floodplains, wetlands, endangered and threatened species, critical wildlife habitats, soils, prime farmland, water and air quality, low-income and minority populations, and other resources.

Example - NHPA Considerations for Acquisition & Demolition Projects

Removal of structures from the areas of risk is the most permanent form of hazard mitigation. While this may be the most practical solution for buildings subject to repetitive hazard events and that have sustained extensive structural damage, demolition of individual historic buildings or multiple buildings within historic districts has serious ramifications.

When planning an acquisition of a hazard-prone structure, FEMA advises communities to ensure that no physical actions occur before historic buildings and archaeological resources are identified and environmental compliance review is complete.



Where technically feasible, other options besides acquisition and demolition should be considered for historic structures. The earliest portion of this building, originally a warehouse, dates to the turn of the 19th century. The building was adapted to be a visitor center despite the risk of flooding. Flood openings are visible beneath the unpainted brick along the river-facing façade. *Williamsport, Washington County.*



A decision to demolish should be made only after extensive research of the historic property or district has been completed, in order to fully understand the significance of the building(s) that would be lost.

General Photography Guidance for Subapplication Submission

In the case of most of the properties in your applications, these photographs will be the only and final record of the properties. Clear and easily understandable photo documentation is essential in assisting project reviewers as they evaluate submissions.

As the agency with oversight over the national historic preservation program, the National Park Service (NPS) provides guidelines and expectations on the quality of photographs and documentation as it relates to historic resources.

FEMA's recommendations for photograph standards are consistent with those issued by the NPS in order to facilitate any historic property consultations between FEMA and the SHPO, the Maryland Historical Trust.

If you are unclear if a photo is acceptable, refer to FEMA's guidance in their EHP Screening Form guidance and/or consult the EHP staff at FEMA. Proper photographs following these guidelines will be required in order to complete EHP review.

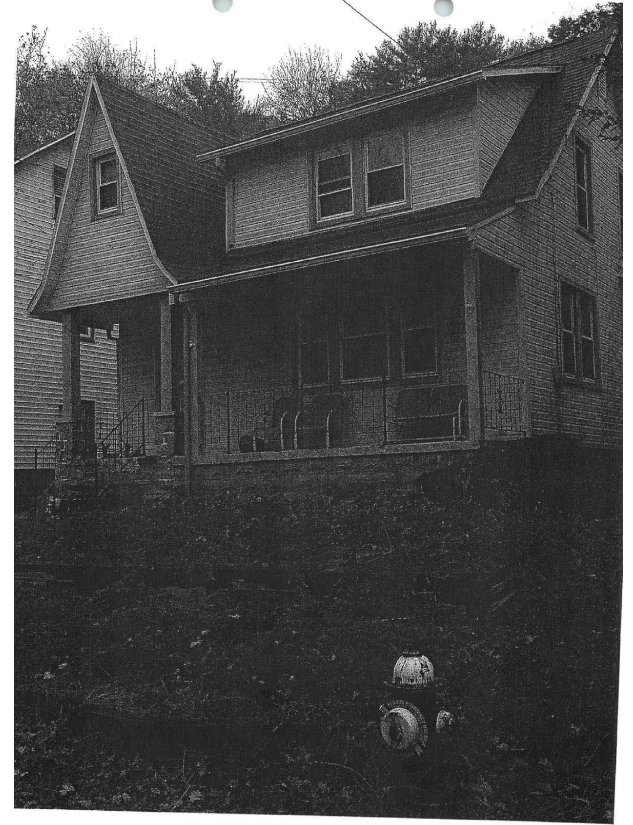


Photo Composition and Quality DOs and DON'Ts

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.

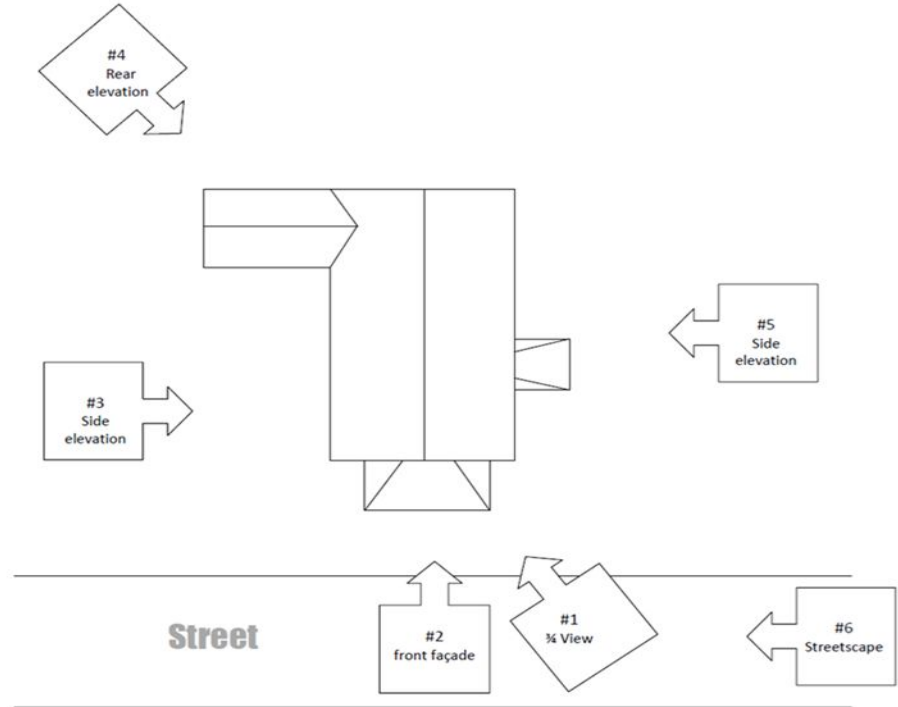


Photo Composition and Quality DOs and DON'Ts



DON'T have people in the photographs. This includes both owners/bystanders on porches and on the property and project staff in foreground.

DON'T have obstructed views of buildings if possible. This includes tree coverage, car windows and things on the street such a storage containers and dumpsters. Taking photos from multiple viewpoints may be necessary.

DON'T supply scanned photographs. Scanned photographs mean the quality of the photos is lost not only once (through the printing) but twice (through the scan). This leads to the photos being grainy, too blown out/too dark.

DON'T digitally alter the photographs in any way (cropping, resizing, obscuring people).



Photo Composition and Quality DOs and DON'Ts – 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.

DO verify that each subject property in the project is represented in photographs and that the supplied photographs are of the correct building (use Google Street View and/or Google Earth to verify).



DO - Taken from a front view, this photo has a landscape orientation & provides a complete representation of the structure.

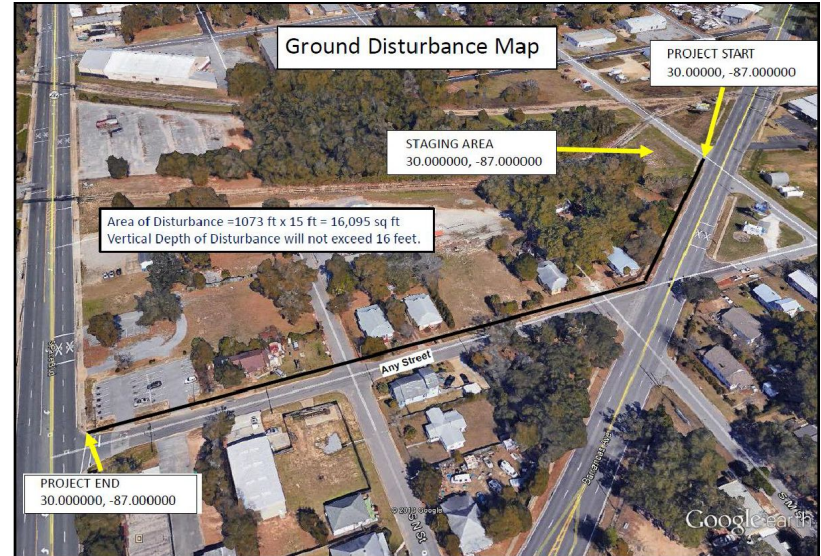


DON'T - This photograph was taken at a crooked angle; thus portions of the façade was not visible.

Photo Composition and Quality DOs and DON'Ts – Infrastructure Projects

DO provide photos of limits of disturbance/project area and surrounding areas. If multiple sites are in an application, make sure you have accounted for all sites.

DO provide photos of the ground if ground disturbance is involved. These photos should provide context and show surroundings.



How to Make EHP Reviews Go Smoothly

- Complete and attach the EHP Screening form to your FEMA GO Subapplication.
- Provide well organized attachments that are clearly named to aid the FEMA reviewer.
- Conduct initial background check for projects with buildings 50+ years old and new construction projects with ground disturbance to learn if the property or site has a historic designation.
- Consult state and local preservation or planning agencies for known historic resources and archaeology sensitive areas.
- Provide well-designed maps with areas and activities clearly labeled; Identify any equipment or material staging areas.
- Submit professionally designed drawings when possible.

Keys to Success!

- Legwork upfront can shorten project review timeframes
- Answer questions based on known information; do not guess or assume
- Well written project descriptions along with clear, well labeled maps, and photos aid MEMA & FEMA staff during the evaluation process

Complete scopes of work and clear documentation = EHP review foundation

For More Information

- MEMA: <https://mema.maryland.gov/community/Pages/grant-subapplicant-resources.aspx>
- FEMA EHP Assistance: <https://www.fema.gov/grants/guidance-tools/environmental-historic>
- FEMA EHP Checklist & Screening Form:
<https://www.fema.gov/grants/preparedness/preparedness-grants-ehp-compliance>
- FEMA GO: <https://www.fema.gov/grants/guidance-tools/fema-go>
- Flood Mitigation Guide - Maryland Historical Trust:
https://mht.maryland.gov/documents/PDF/plan/floodpaper/2018-06-30_MD%20Flood%20Mitigation%20Guide.pdf

Questions about the GPD EHP review process can be sent to the GPD EHP inbox at GPDEHPinfo@fema.dhs.gov



Maryland

EMERGENCY MANAGEMENT
AGENCY

The mission of the Maryland Emergency Management Agency is to proactively reduce disaster risks and reliably manage consequences through collaborative work with Maryland's communities and partners.

Teri Rising with the Maryland Environmental Service