

FEMA Environmental and Historic Preservation (EHP) Guidance

Use of HSGP funds for construction and renovation is generally prohibited except as outlined below. Such construction and renovation shall be strictly limited and allowable only when it is a necessary component of a security system at critical infrastructure facilities. CCP and MMRS funds may not be used for any type of construction or renovation.

Project construction and renovation not exceeding \$1,000,000 is allowable, as deemed necessary. The following types of projects are considered to constitute construction or renovation, and **MUST BE SUBMITTED** to FEMA for compliance review under Federal environmental planning and historic preservation (EHP) laws and requirements **PRIOR TO** initiation of the project:

- 1) Construction of and renovation to guard facilities
- 2) Renovation of and modifications, including the installation of security and communication equipment, to buildings and structures **THAT ARE 50 YEARS OLD OR OLDER**
- 3) Any other construction or renovation efforts that change or expand the footprint of a facility or structure, including security enhancements to improve perimeter security.
- 4) Physical security enhancements, including but not limited to:
 - o Lighting
 - o Fencing
 - o Closed-circuit television (CCTV) systems
 - o Motion detection systems
 - o Barriers, doors, gates and related security enhancements
- 5) In addition, the erection of communications towers that are included in a jurisdiction's interoperable communications plan is allowed, subject to all applicable laws, regulations, and licensing provisions. Communication tower projects must be submitted to FEMA for EHP review.

In order to draw down funds for construction and renovation costs under HSGP, grantees must provide to FEMA:

- * A description of the asset or facility, asset location, whether the infrastructure is publicly or privately owned, and the construction or renovation project
- * Certification that a facility vulnerability assessment has been conducted
- * An outline addressing how the construction or renovation project will address the identified vulnerabilities from the assessment
- * Consequences of not implementing the construction or renovation project
- * Any additional information requested by FEMA to ensure compliance with Federal environmental and historic preservation requirements.