

OFFICE OF ENVIRONMENTAL PLANNING AND HISTORIC PRESERVATION PARTNERS IN SHAPING RESILIENT COMMUNITIES



Environmental and Historic Preservation (EHP) Fact Sheet: Perimeter Security Enhancements

Environmental resources, cultural institutions, and historic assets define communities and contribute to their well-being and unique character. The Federal Emergency Management Agency (FEMA) plays a critical role in helping communities incorporate environmental stewardship and historic preservation into emergency management decisions. As disasters continue to challenge our nation and communities grapple with issues of preparedness and sustainability, FEMA offers expertise to ensure both legal compliance and informed local, State, Tribal, and national planning.

Perimeter Security Enhancements and EHP Review

FEMA's Grants Program Directorate (GPD) provides funds to eligible applicants for the installation of perimeter security enhancements that protect employees, visitors, and building functions and services from outside threats. These enhancements, which can include security fencing, gates, and bollards, are designed to help control access to vulnerable buildings and sites.

The installation of perimeter security enhancements—whether new installations or the replacement of existing systems—can have long-term impacts on the environment and historic properties. Of particular concern are the visual changes that may occur if the project takes place in, on, or adjacent to a historic building or historic district. Trenching or digging to construct fences, gates, and/or bollards may also affect archaeological resources. Before FEMA grant funding can be secured for these projects, EHP review must be completed to ensure compliance with applicable Federal laws, regulations, and executive orders, such as the National Environmental Policy Act, National Historic Preservation Act , Endangered Species Act , and Executive Order 11988 (Floodplain Management).

Considering EHP Impacts

FEMA carefully reviews each perimeter security enhancement project to assess potential impacts and works with the applicant to provide guidance on EHP compliance requirements. This helps applicants EHP Considerations for Perimeter Security Enhancements When planning the installation of perimeter security enhancements, FEMA advises communities to:

- Minimize the visual impacts of equipment in, on, or adjacent to historic properties or historic districts.
- Design projects to avoid or minimize physical changes or damage to historic properties, paying special attention to methods for attaching equipment to buildings/structures.
- Limit or avoid ground disturbance.
- When replacing security equipment, choose devices that are similar in size, color, and model to those already in place.

anticipate and address potential EHP issues so they are better positioned to satisfy requirements and more quickly secure FEMA grant funding critical for project completion. When installing perimeter security enhancements, applicants should pay special attention to how the project may impact historic structures and archaeological resources, while also considering impacts on floodplains, wetlands, and other environmental resources.

Coordination with resource agencies, prior to submitting project applications to FEMA can greatly assist in identifying areas of concern in the early phases of project development. For projects involving buildings more than fifty years old and those that may involve significant ground disturbance, applicants should contact the State Historic Preservation Officer (SHPO) to determine if the property is listed in or eligible for the National Register of Historic Places, or is within a historic district. Historic property designation may impact the design of the project.



Perimeter Security Enhancements: EHP Review Checklist

The checklist below provides project information that FEMA requires in order to complete EHP review of a perimeter security enhancement project.

\checkmark	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 Maps, aerial imagery, or drawings, clearly showing the locations of the security enhancement components.
\checkmark	Description of Project Scope of Work	Provide a detailed description of the scope of work of the project, including specific proposed action(s); exact location where equipment will be installed; and description of how the project will be implemented. Include any proposed ground disturbance, with details on the depth, length, and width, when applicable; any vegetation removal; as well as a description (if applicable) of how security enhancements will be attached to historic properties.
\checkmark	Age of Existing Buildings	Provide the original date of construction for any buildings or structures located on or within view of the proposed project site.
\checkmark	Photographs	Provide aerial and ground-level color photographs indicating where all equipment will be installed and where ground disturbance/vegetation removal will occur. Label photographs with the location and orientation of the camera to the security equipment and building(s). For all installations on, in, or adjacent to buildings more than 50 years of age, provide photographs of all exterior sides of the building or structure.
\checkmark	Agency Coordination	Coordinating with applicable resource agencies, such as the SHPO and U.S. Fish and Wildlife Service, prior to submitting your application to FEMA can help streamline EHP review. Please note any such communications and provide copies of correspondence and permits.
\checkmark	Additional Information	Include copies of other relevant information, such as historic property surveys, historic designations, archaeological surveys, or environmental assessments.

Timeframes for EHP Review

Timeframes for EHP review vary depending on a project's potential to impact environmental, historic, and archaeological resources. However, the review process generally takes 30 to 60 days after FEMA has received a complete project application with supporting documentation. Some projects may require FEMA to consult with resource agencies, such as U. S. Fish and Wildlife Service and the State and/or Tribal Historic Preservation Office. These consultations will extend the review period a minimum of 60 to 90 days as they involve outside resource agencies and other stakeholders.

EHP Best Practices: Security Fencing and Agency Coordination in Washington State

In Washington State, a proposed project at a historic dam site involved the installation of security fencing and other equipment. Early consultation with the SHPO prior to submitting the grant application helped identify archaeological resources that might be adversely affected by installing fence posts. Discussions between parties identified an alternative location for the fencing, avoiding the archaeologically sensitive area and eliminating the need for a detailed archaeological analysis. By coordinating with SHPO early in the process while plans were still flexible, the applicant was able to make a change in location to avoid archaeological issues that would have significantly delayed project implementation.

Additional Resources: For more information on EHP review and FEMA grant assistance, contact your State Emergency Management Agency or Tribal Office or visit http://www.fema.gov/environmental-planning-and-historic-preservation-program.