

FAQ: Environmental and Historic Preservation

1. Do all construction and renovation projects require preparation of a draft Environmental Assessment or Section 106 consultation?

No. Some construction and renovation projects may fall under a Programmatic Environmental Assessment prepared by HRSA. The Notice of Grant Award should identify the environmental and historic preservation requirements needed to satisfy the condition of award. In some cases, the information submitted with the application may not have been sufficient to determine the level of compliance, and additional information may be requested.

2. How is it determined if Historic Preservation requirements may apply to a project?

To initially determine if Section 106 consultation may be required, the project is reviewed using the following set of questions:

1. Is the project facility 50 years or older?
2. Does the overall proposed project include:
 - i. Any renovation/modification to the exterior of the facility (including the installation of new signage)?
 - ii. Ground disturbance activities (including installation of access ramps, utility work, installation of curb cuts, fencing, and/or parking)?
 - iii. Does the project involve alteration/renovation/repair to a project facility that is architecturally, historically, or culturally significant?
 - iv. Is the site located on Native American, Alaskan Native, Native Hawaiian, or equivalent culturally significant lands?

If the answer is yes to one or more of the above question, Section 106 consultation will be required before any physical work can begin.

3. Do environmental and historic preservation requirements just apply to portions of my project being funded with the Federal grant?

No. It is important to note that the Environmental and Historic Preservation compliance requirements apply to the total scope of the project, including non-Federally funded connected actions. Also be aware the future changes in the scope of project (such as a new site, or adding parcels, or changing the configuration of the facility) may necessitate reinstatement of environmental and historic preservation conditions.

4. Can I start site or construction work on my project even though I haven't completed my environmental or historic preservation conditions yet?

The Notice of Grant Award clearly states that only non-construction preparatory activities such as architectural and engineering designs, permitting, licenses, and work related to the environmental and historic preservation reviews may be undertaken prior to the release of the Environmental or Historic Preservation conditions. Use of grant funding to complete these activities is allowable.

At the time an award is made, grantees that proceed to undertake site preparation, construction, and renovation work without meeting the appropriate conditions do so at their own risk. If subsequent environmental or historic preservation reviews indicate site conditions or impacts that cannot be appropriately addressed or mitigated, HRSA may be unable to fund the project.