

NHPA/NEPA Review - Frequently asked questions:

1. The City/Municipality has approved my project activities for historic preservation concerns, do I still need an NEA NHPA/NEPA review?

Yes. Though a city/municipality may have reviewed project activities for historic preservation concerns or provided an assessment of historic properties, the NEA must still complete its own review. A grantee should include any correspondence from the city/municipality about its own review to expedite NEA's review.

2. My project activities involve my organization's own building/location, do I still need a NHPA/NEPA review?

Yes. The NHPA/NEPA requirement is tied to the project activities associated with NEA's release of federal funds. The NHPA, Section 106 Review is meant to address effects of the use of federal funds on any property, regardless of ownership.

3. If I've already contacted the State Historic Preservation Officer (SHPO) and they provided me with a letter, does the NEA want to see it?

YES. In some cases, the contents of the letter may demonstrate compliance or help expedite review. Include any relevant correspondence you may have received from the SHPO with the NHPA/NEPA questionnaire. For instance, if a SHPO's letter indicates that there are no historic properties affected by your project activities or that there will be "no adverse effect" associated with your grant activities, please forward that to the NEA.

4. Why does the NEA ask for ages of all buildings and locations? After all, I've consulted in the past on federal project activities and the NHPA, Section 106 review process addresses only properties that are eligible for or listed in the National Register of Historic Places.

The NEA's Review process considers **ALL properties and locations** that are older than 50 years of age. This practice allows the NEA and the grantee to avoid expensive and lengthy historic property surveys written by professional historians by ASSUMING historic significance.

5. I don't know my activities and/or locations because identifying those actions/locations is part of the process covered by my project activities. How do I handle that?

In order to 'clear' a grant for NHPA/NEPA concerns the NEA MUST have the information associated with the questionnaire. This means that the grantee should plan to coordinate and understand the schedule AND plan to provide to the NEA specific activities and locations AS SOON AS they are known.

Project activities taken prior to the NEA's completion of NEPA/NHPA compliance are not guaranteed for reimbursement without a 'clearance', and the NEA's review is dependent on specific information. Funds can be released only after the NEA's NHPA/NEPA review is complete. As such, if a grantee moves forward without this clearance, they do so on their own accord. There is never a guarantee that project activities will be cleared out of NHPA review since the review is based on a number of factors that must be satisfied.

You should plan to provide thorough and complete answers to the questionnaire and to proceed with project activities only after NEA issues a 'clearance.'

6. Must I fill out a separate questionnaire for each location and/or activity?

NO.

You may use one questionnaire to include information related to all activities and locations.

7. Who do I contact if I have questions about the Questionnaire?

Start with your discipline specialist who is familiar with the Questionnaire requirements and who reviews the questionnaire for accuracy and completeness.

8. My prior project activities have been 'cleared' in a previous year. This year, my project activities are similar, do I need to fill out another questionnaire?

YES. NEA must verify, and you must clarify, the events associated with the current grant application under NHPA/NHEAP review and whether the project activities and/or locations have changed in any way.

9. I have photos and/or maps of locations and activities. Should I include them with the Questionnaire?

YES!

Pictures, diagrams, maps, etc. of activities and/or locations are very helpful.