

NEPA Related to NFP Grants

When NEPA does not apply

- NEPA does not apply to all National Fire Plan grants projects
 - NEPA only applies where a federal agency makes a decision to fund a specific grant or group of grants
- Through the Grants Clearinghouse process, an independent group of folks review and rank the submitted grant projects and then presents a list of grant projects to each federal agency participating in the Clearinghouse.
 - The agency then funds from the top of the list down until there is no more federal funding.
- Through this process, NEPA is not triggered since a federal agency did not make a specific decision to select/fund a specific grant project.

When NEPA applies

The following are some questions to ponder during the development phase of a grant project where you are planning on requesting federal funding for the implementation of activities that will effect vegetation and/or cause ground disturbance:

- Can the federal agency conduct the NEPA in a timely manner to meet your proposed time line for project implementation?
 - Talk to the local federal agencies that may potentially fund your projects
 - Find out the following:
 - What is there program of work related to NEPA documentation?
 - Do they have specific guidance/direction for NEPA documentation development?
 - What can you do to assist them in the completion of NEPA documentation to meet the timelines of your grant project if it is selected in a specific fiscal year?
 - Plan on requesting funding under the grant proposal to cover surveys and documentation for NEPA and other environmental components.
 - Conduct specific surveys
 - You are qualified to do the surveys?
 - If CEQA is tripped, can NEPA surveys be conducted in concurrence to CEQA/CESA/state NHPA surveys?
 - Is there a local qualified contractor/consultant?
 - Development of survey/NEPA documentation
 - Can you write them?
 - Can a contractor/consultant write them?
- Work with the local federal agencies prior to submitting a grant projects.
 - This may lead to a number of significant beneficial outcomes:
 - Little to no environmental effects from project activities
 - Limited funding can be used for project implementation instead of consultant fees
 - Little to no environmental documentation needed
 - More time for project implementation instead of project documentation/administration
- The federal agency is in the end responsible for the adherence to the NEPA process and the development and final signage of analysis and decision documentation.

CEQA help streamline the NEPA process

If CEQA is required for your grant project, this documentation can greatly assist the federal agency in the completion of several sections or pieces of sections within a NEPA analysis and documentation.

- If CEQA is being completed, this can greatly assist the federal agency conducting a NEPA analysis that includes your grant project(s)
 - A majority of the CEQA documentation can be used by the federal agency during their NEPA development process.
- If a project is exempt under CEQA, does not mean it will be exempt under NEPA.
- There are some differences between CEQA and NEPA related to what is required within specific sections of their respective analysis documents.

Take Home Message.....

- Talk the local federal agency that may be funding your projects prior to submitting your grant project for funding
 - This may save a lot of time
 - Develop wonderful working relationships with your federal and local partners
 - Open up and make available technical expertise and tools that will help you plan and implement your projects
 - Possibly streamline the planning and implementation process for your grant projects