

## Environmental Review: Frequently Asked Questions

### ***What triggers environmental review?***

Each year, thousands of projects affect historic properties in Georgia. Many projects are initiated by, paid for by, or require permits or licenses from, government agencies. Both state and federal statutes require the agency or applicant responsible for the project to consult with the Historic Preservation Division (HPD) in order to take into account the effects the project may have on Georgia's cultural resources.

### ***What is HPD's role in environmental review?***

HPD's role is to assist federal agencies in complying with Section 106 and Section 110 of the National Historic Preservation Act (NHPA) and state agencies in complying with Georgia Environmental Policy Act (GEPA) and State Agency Historic Property Stewardship Program (State Stewardship).

The Environmental Review process provides the planning framework that requires federal and state agencies to take into account the effects of their projects and actions on historic structural and archaeological resources that are eligible for or listed in the Georgia/National Register of Historic Places.

### ***What is a historic property?***

An above- or below-ground resource is considered "historic" if it is 50 years old or older.

Under federal law, an historic *property* is a historic resource (i.e., any district, site, building, structure, or object) that meets the criteria for listing in the National Register of Historic Places. The National Register is a list established by the NHPA of 1966, as amended, to recognize properties for their significance in history, architecture, archaeology, engineering, or culture. Under state law, a historic property is any district, site, building, structure, or object eligible for listing in the Georgia Register of Historic Places. The criteria are the same as those used for the National Register.

You may find it helpful to check Georgia's Natural, Archaeological, and Historic Resources Geographic Information System (GNAHRGIS) database. GNAHRGIS contains information about the state's archaeological and historic resources.

In the GNAHRGIS system, “archaeological resources” refer to archaeological sites recorded in the [Georgia Archaeological Site File](#) (GASF) at the University of Georgia (UGA). Information about archaeological sites in GNAHRGIS is restricted, but staff at the GASF at UGA, will conduct database research for a fee.

In the GNAHRGIS system, “historic resources” encompass buildings, structures, historic sites, landscapes, and districts included in the Historic Preservation Division's Historic Resources Survey or listed in the National Register of Historic Places. Historic resource information can be found here: <https://www.gnahrgis.org/PublicHome/Index?ReturnUrl=%2f>.

Please note that not all areas of the state have been surveyed for historic properties and the results of resource evaluation effects through the Section 106 and/or GEPA/State Stewardship process are not recorded in GNAHRGIS; therefore, GNAHRGIS is not all-encompassing.

### ***What documentation does HPD need to complete review of projects?***

For the majority of projects, HPD requests that applicants use our Environmental Review (ER) Form when submitting projects for review. The ER Form can be found in a PDF or Word version on the main Environmental Review and Compliance page of our website.

Please fill out the form completely and submit it, along with the required supporting materials (maps, photos, project plans, etc.) through our online project submittal portal (detailed user guidance provided here: <https://www.dca.ga.gov/node/8233>), or by email to [ER@dca.ga.gov](mailto:ER@dca.ga.gov) (see details below).

By completing the form to the greatest extent possible and including the required supporting material, a prolonged review process is less likely since HPD should not need to request additional information.

For communication tower projects, please see the Communication Tower Projects portion of our website under Environmental Review and Compliance for details and guidelines as to research and submittal requirements.

### ***Is electronic project submittal available?***

Yes! Register as a user in the ER online project submittal system and submit projects directly into the online project tracking system.

Detailed instructions for registering for and creating projects in the system are found here: <https://www.dca.ga.gov/node/8233>

Using the ER external project submission system will create efficiencies for agencies and project applicants:

- new projects are easily created in the system
- review progress can be tracked, including the end date of the review period
- system notifications are sent at various stages in the review process
- large files are easily appended to projects in the online system

Electronic submission of projects via email to [ER@dca.ga.gov](mailto:ER@dca.ga.gov) remains an option if technical issues arise with the online portal.

### ***What is HPD's expected response time?***

HPD has a federally mandated 30-calendar day review period from the date of submittal receipt. If it has been more than 30 days since your project was submitted, make sure to check your spam or junk folders, as our responses come via email from an unmanned email address.

If you have not received a response after 30 calendar days, please reach out to [ER@dca.ga.gov](mailto:ER@dca.ga.gov) with details of your project including the address or associated street names, city, and county and request a response status update.

Please note: if project submittals are incomplete and more information is requested by HPD, a 30-day review period will restart when the additional information is received.

### ***Is HPD able to expedite reviews?***

With HPD's limited staff and the hundreds of reviews submitted in a month, we are unfortunately unable to expedite reviews.

### ***What happens if my project is determined to have an adverse effect or significant impact?***

When an adverse effect or significant impact is determined, this means that additional documentation and steps in the process are needed in order for the project to proceed. Our response letter will provide detailed guidance on next steps if an adverse effect or significant impact is determined for a project.

By law, agencies should try to avoid, minimize or mitigate the negative effects of a project. To do so, HPD will ask for documentation showing that an attempt has been made to avoid or minimize the effect. For example, if the project involves demolition of a historic property, the applicant may provide details related to whether rehabilitation discussed and why was it ruled out. If options were not discussed that could avoid or minimize the adverse effect, then HPD will ask that these options be explored.

Once the correct documentation has been provided to demonstrate such options and discussions, and the options are not feasible, then mitigation becomes the only remaining option. This step involves the applicant drafting a Memorandum of Agreement (MOA) and all parties involved agreeing upon mitigation stipulations. The draft is then circulated for comments, and a final MOA is prepared for signature. Once the MOA is executed, the project may proceed. However, the MOA stipulations must be fulfilled within the timeline specified in the agreement in order for the process to be considered complete.

***Where can I ask project-specific questions?***

Reach out to [ER@dca.ga.gov](mailto:ER@dca.ga.gov) with project-specific questions. Be sure to include project details such as the agency involved, address, city, county, and the project's name so that your inquiry can be routed to the appropriate HPD staff.