HEROS Training
NCDA Conference
Knoxville

Liz Zepeda
October 3, 2019
Agenda

- Introduction to Environmental Reviews for HUD projects
- HEROS overview
- Demo #1: Using HEROS for a tenant-based rental assistance project
- Demo #2: Using HEROS for a multifamily rehab project
- Environmental Assessments and HEROS
- Working with Partners in HEROS
- Demo #3: Using HEROS for a tiered single-family rehab program
- Questions *(welcome throughout!)*
What is an Environmental Review?

Quick review of the basics
How well do you know environmental reviews?

- Lots of experience with ERs for HUD projects
- Worked with them a bit
- Totally new to it
What is an Environmental Review?

Analysis of the impact of a project on the surrounding environment and vice versa
  • Ensures that HUD-funded projects provide decent, safe, and sanitary housing
  • Documents compliance with all applicable federal environmental laws and authorities

A public document that encourages public participation
Environmental Review Records

- Project information
- Analysis of environmental laws and authorities
- Documentation of compliance
- Any required mitigation measures or conditions
- Certifications from all required parties
• The **National Environmental Policy Act (NEPA)** requires all Federal agencies to perform an Environmental Review prior to approving or funding any project or action
  • Some actions are “categorically excluded” from NEPA

• HUD must also comply with a variety of **related environmental laws and authorities**
  • National Historic Preservation Act, Endangered Species Act, Clean Air Act, etc.

• HUD has **environmental regulations** with additional requirements that apply only to HUD projects
  • Floodplain Management, Wetland Protection, Noise, Explosive and Flammable Hazards
<table>
<thead>
<tr>
<th>Part</th>
<th>Regulations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Part 50</td>
<td>Procedures for ERs performed by HUD staff</td>
</tr>
<tr>
<td>Part 51</td>
<td>HUD standards for noise, explosive and flammable hazards, and airport clear zones</td>
</tr>
<tr>
<td>Part 55</td>
<td>HUD standards for floodplain management and wetlands protection</td>
</tr>
<tr>
<td>Part 58</td>
<td>Procedures for ERs performed by local, state, and tribal govts (&quot;responsible entities&quot;)</td>
</tr>
</tbody>
</table>
When are Environmental Reviews performed?

Required for all projects receiving HUD financial assistance

- Environmental Review requirements kick in when an application for HUD funds has been submitted

MUST be conducted BEFORE funds are committed

- Neither the direct recipient of HUD funds nor their contractors may spend or commit HUD funds until environmental review is complete (24 CFR 58.22)

- Initiate Environmental Review process as soon as possible to avoid delays
What Is a Responsible Entity?

- Responsible Entity (RE) assumes federal responsibilities for Part 58 ERs
- RE = a unit of general local, tribal, or state government
- Under Part 58, RE’s responsibilities include:
  - Conducting the ER, including all findings
  - Taking legal responsibility for review
  - When needed, submitting Form 7015.15 to HUD certifying that the ER is complete
- Certifying Officer (e.g. Mayor) signs off on ERs
Part 50 versus Part 58

**Non-govt’l grant recipient:** required to assist with preparation of ER

**Responsible Entity:** may complete ER under Part 58 procedures

**HUD:** may complete ER under Part 50 procedures
Environmental Review Process

1. Define the project
2. Determine the level of review
3. Perform analysis and document compliance with all applicable environmental laws and authorities
4. Complete all required notifications and approvals
5. Follow through
Step 1:
Meaningful Project Descriptions Include…

- **Location**—describe so the public can locate (e.g. street address or map coordinates)

- **Purpose and Need**—describe what is being done and why it is necessary

- **Project Beneficiaries** (i.e. affordable housing project, mixed use housing project, market rate housing project)

- **Description**—provide complete details about the project and what will be done
  - All activities (e.g. new construction of multifamily housing, rehabilitation of existing buildings)
  - Physical description of existing and/or proposed new buildings
  - Timeframe for implementation
  - Size of the project (area coverage, disturbance footprint, number of units, population served)

- **Area Setting**—character, features, resources, trends likely in absence of project

- **All funding sources & development partners**
Aggregation

- Project Aggregation is the basis for defining the project scope and developing the project description.
- REs should group together and evaluate as a single project all individual activities that are related:
  - Geographically related
  - Logical parts of a composite of contemplated activities
Step 2: Levels of Review for HUD Projects

- Environmental Impact Statement
- Environmental Assessment
- Categorically Excluded Subject to 58.5
- Categorically Excluded Not Subject to 58.5 & Exempt
Exempt & Categorically Excluded Not Subject to 58.5 (“CENST”)

Exempt/CENST activities include...

- Information & financial services
- Administrative & management activities
- Public services without physical impact
- Tenant-based rental assistance
- Supportive Services (healthcare, housing placement)
- Operating costs (utilities, supplies)
- Economic development costs (non-construction)
- Pre-development costs
- Maintenance (see Notice CPD 16-02)

See 24 CFR 58.34 & 58.35(b) for full list

Exempt & CENST projects must comply with 24 CFR 58.6

- National Flood Insurance Program
- Coastal Barrier Resources Act
- Airport Runway Clear Zones
CEST activities include...
- “Minor” repairs and rehabilitation (see 24 CFR 58.35(a)(3))
- Project-based rental assistance and leasing
- New construction of single family homes (less than 5 units)

(See 24 CFR 58.35(a) for full list)

CEST projects must:
1. Comply with 24 CFR 58.6 and 58.5, and
2. Determine whether any formal compliance or mitigation is required
   - If so, the RE must:
     - Provide public notice, and
     - Submit form 7015.15 – Request for Release of Funds and Environmental Certification to HUD
   - If not, the review “converts to exempt” (same procedural requirements apply as if the project were exempt/CENST)
24 CFR 58.5

- Clean Air Act
- Coastal Zone Management Act
- Contamination and Toxic Substances
- Endangered Species Act
- E.O. 11988 on Floodplain Management
- National Historic Preservation Act
- Noise Abatement Regulation
- Sole Source Aquifers
- E. O. 11990 on Wetlands
- Wild and Scenic Rivers Act
- Explosive and Flammable Hazards
- Farmlands Protection Policy Act
Environmental Assessment (EA)

EA-level activities include...

• "Major" repairs and rehabilitation
• Most new construction, demolition, and conversion of land use

EAs must:

1. Comply with 24 CFR 58.6 and 58.5,
2. Complete the "EA analysis," and
3. Make a Finding
   - If the project is found to have a Significant Impact on the Human Environment, the RE must complete an Environmental Impact Statement (EIS)
   - If a Finding of No Significant Impact (FONSI) is made, give public notice and complete form 7015.15
An EIS is required if...

- An EA concluded in a Finding of Significant Impact
- A project affects more than 2,500 units or beds

See CEQ regulations at 40 CFR 1502.10 for information on completing an EIS.
Requirements by Level of Review

Exempt/CENST
- 58.6 Compliance

CEST
- 58.6 Compliance

EA
- 58.6 Compliance

EIS
- 58.6 Compliance

Make a Finding

CEQ EIS Reqts

FONSI, NOI/RROF

NOI/RROF

EA Factors

NOI/RROF

Make a Finding
If a CEST project does not convert to exempt:

1. RE must give public Notice of Intent to Request Release of Funds (NOI-RROF)

2. Form 7015.15 – Request for Release of Funds and Certification (RROF/C) must be submitted to HUD
   • The ER is not complete until HUD completes Form 7015.16 – Authority to Use Grant Funds (AUGF)

All EAs require a FONSI Notice and NOI-RROF

1. Notices should generally be combined

2. All EAs also require Form 7015.15 – RROF/C and 7015.16 - AUGF

<table>
<thead>
<tr>
<th>Type of Notice</th>
<th>Length of Comment Period</th>
</tr>
</thead>
<tbody>
<tr>
<td>Notice of Intent to Request for Release of Funds (NOI-RROF)</td>
<td>7 days when published Or 10 days when only mailing and posting</td>
</tr>
<tr>
<td>Notice of FONSI</td>
<td>15 days when published Or 18 days when mailing and posting</td>
</tr>
<tr>
<td>Concurrent or combined notices</td>
<td>15 days when published Or 18 days when mailing and posting</td>
</tr>
</tbody>
</table>
Request for Release of Funds and Certification

This form is to be used by Responsible Entities and Recipients (as defined in 24 CFR 58.2) when requesting the release of funds, and requesting the authority to use such funds, for HUD programs identified by statutes that provide for the assumption of the environmental review responsibility by units of general local government and States. Public reporting burden for this collection of information is estimated to average 36 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless that collection displays a valid OMB control number.

Part 1. Program Description and Request for Release of Funds (to be completed by Responsible Entity)

<p>| | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Program Title(s)</td>
<td>2. HUD/State Identification Number</td>
<td>3. Recipient Identification Number (optional)</td>
</tr>
<tr>
<td>4. OMB Catalog Number(s)</td>
<td>5. Name and address of responsible entity</td>
<td></td>
</tr>
<tr>
<td>6. For information about this request, contact (name &amp; phone number)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>8. HUD or State Agency and office unit to receive request</td>
<td>7. Name and address of recipient (if different than responsible entity)</td>
<td></td>
</tr>
</tbody>
</table>

The recipient(s) of assistance under the program(s) listed above requests the release of funds and removal of environmental grant conditions governing the use of the assistance for the following

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>9. Program Activity/ies)/Project Name(s)</td>
<td>10. Location (Street address, city, county, State)</td>
</tr>
<tr>
<td>11. Program Activity/Project Description</td>
<td></td>
</tr>
</tbody>
</table>
Environmental Review

Welcome to the official website for the Department of Housing and Urban Development's (HUD's) Office of Environment and Energy. The Office of Environment and Energy (OEE) manages the environmental review process for HUD.

An environmental review is the process of reviewing a project and its potential environmental impacts to determine whether it meets federal, state, and local environmental standards. The environmental review process is required for all HUD-assisted projects to ensure that the proposed project does not negatively impact the surrounding environment and that the property site itself will not have an adverse environmental or health effect on end users. Not every project is subject to a full environmental review (i.e., every project's environmental impact must be examined, but the extent of this examination varies), but every project must be in compliance with the National Environmental Policy Act (NEPA), and other related Federal and state environmental laws.

Orientation to Environmental Reviews

Explore the components of an environmental review. The section contains information pertaining to both Part 50 and Part 58 reviews.

Learn about the Environmental Review Process

Related Federal Environmental Laws and Authorities

Learn about the environmental requirements covered by related federal laws and authorities and referenced in HUD's regulations at 24 CFR 50.4, 58.5, and 58.6. Each environmental topic features a compilation of resources such as trainings, guidance, and useful websites. This section contains all of the content from the Assessment Tools for Environmental Compliance (ATEC).

View Resources

Environmental Review News & Announcements

Register Today: Part 58 Environmental Review Training (Region V) - Chicago, IL - June 11-13, 2019

https://www.hudexchange.info/programs/environmental-review/
HUD Environmental Staff Contacts

HUD has expert staff in locations around the country to assist persons involved in the environmental review of HUD-funded projects to answer questions about the environmental review policies, processes, and specific projects. The first step should be to contact them via email with any questions that you cannot answer by browsing the basic information available on this web site.

**Headquarters Environmental Staff:** HUD’s Office of Environment and Energy includes various national level specialists headquartered in Washington, DC.

**Program Environmental Clearance Officers:** Program Officers that are knowledgeable about specific program areas within HUD may be able to provide additional information about environmental issues pertaining to their area.

**Regional and Field Environmental Officers:** Locate your nearest HUD professional environmental staff person who can help you understand how to use the environmental assessment process to improve the quality of your project.

If you are unsure of your assigned region, use the "Find Your Region" tool.

---

### Find by Contact Type

<table>
<thead>
<tr>
<th>Region IV: Regional and Field Environmental Officers</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>States</th>
<th>Name</th>
<th>Phone</th>
</tr>
</thead>
<tbody>
<tr>
<td>Boston</td>
<td>Martha A. Curran</td>
<td>(617) 994-8363</td>
</tr>
<tr>
<td>(Acting Region 4 REO – Disaster Grants)</td>
<td>Regional Environmental Officer</td>
<td>HUD - Boston Regional Office</td>
</tr>
<tr>
<td></td>
<td></td>
<td>10 Causeway Street, Room 535</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Boston, MA 02221-1092</td>
</tr>
<tr>
<td></td>
<td></td>
<td><a href="mailto:Martha.A.Curran@hud.gov">Martha.A.Curran@hud.gov</a></td>
</tr>
<tr>
<td>Atlanta</td>
<td>Harold W. Rodriguez</td>
<td>(678) 732-2503</td>
</tr>
<tr>
<td>(KY)</td>
<td>Field Environmental Officer</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Five Points Plaza Building – 15th Floor</td>
<td></td>
</tr>
<tr>
<td></td>
<td>40 Marietta Street</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Atlanta, GA 30302-2306</td>
<td></td>
</tr>
</tbody>
</table>

[https://www.hudexchange.info/programs/environmental-review/hud-environmental-staff-contacts/](https://www.hudexchange.info/programs/environmental-review/hud-environmental-staff-contacts/)
Environmental Review Training

The Environmental Reviews Training webinars, held by HUD's Office of Environment and Energy, provide comprehensive information for grantees and staff on the various components of the environmental review process. All major topics are discussed by subject matter experts. HUD records all Environmental Review Training webinars; these webinar presentations and accompanying materials are available below.

Environmental Review Procedures and Resources

Basics of a Part 58 Environmental Review for HUD-Assisted Projects
This training is a basic orientation to HUD's Part 58 regulations on environmental review responsibilities of Responsible Entities (RE).

Date Published: October 2012

Introduction to the National Environmental Policy Act
This webinar reviews the overall philosophy, history, and purpose of the National Environmental Policy Act (NEPA). NEPA is the basis for HUD's Part 58 regulations.

Date Published: September 2012

https://www.hudexchange.info/programs/environmental-review/environmental-review-training/
Related Federal Laws and Authorities

Choose a topic below to learn more about HUD environmental review compliance with Federal related laws and authorities listed at 24 CFR 50.4, 58.5, and 58.6.

Find by Topic

- Air Quality
- Airport Hazards
- Coastal Barrier Resources
- Coastal Zone Management
- Endangered Species
- Environmental Justice

Coastal Barrier Resources

Introduction
The Coastal Barrier Resources Act (CBRA) of 1982 designated relatively undeveloped coastal barriers along the Atlantic and Gulf coasts as part of the John H. Chafee Coastal Barrier Resources System (CBRS) and made these areas ineligible for most new Federal expenditures and financial assistance. The Coastal Barrier Improvement Act (CBIA) of 1990 reauthorized the CBRA and expanded the CBRS to include undeveloped coastal barriers along the Florida Keys, Great Lakes, Puerto Rico, and U.S. Virgin Islands.

There are a total of 584 system units, encompassing approximately 1.3 million acres of land and associated aquatic habitat. The system units are generally comprised of private lands that were relatively undeveloped at the time of their designation within the CBRS. The boundaries of these units are generally intended to follow geomorphic, development, or cultural features.

The law encourages the conservation of hurricane-prone, biologically rich coastal barriers by restricting Federal expenditures that encourage development. HUD financial assistance may not be used for most activities in CBRS units.

HUD Guidance
Is the project located in a Coastal Barrier Resource System (CBRS) unit? With very limited exceptions, federal assistance is not allowed for projects in a CBRS unit. Federal monies can be spent within CBRS units only for certain exempted activities (e.g., a nature trail) after consultation with the FWS (see 16 USC 3505 for exceptions to limitations on expenditures).

Compliance and Documentation
The environmental review record should contain one of the following:

- A general location map establishing there are no Coastal Barrier Resource System units in the city or county
- A map issued by the FWS or FEMA (or from their website) showing that the proposed project is not located within a designated Coastal Barrier Resource System Unit. The FEMA map panel number must be cited within the Environmental Review Record
- Approval of the project from the FWS, including all prior correspondence

Statute
16 U.S.C. 3501

Resources
- WISER: Water Elements Online Module
- HUD's Guidelines for CBRA Complian
- Fish and Wildlife Service's CBRA Web Page for Guidance
- Fish and Wildlife Service's CBRA Mapper
- Fish and Wildlife Service's Consistency Consultations

Federal Related Laws and Authorities
- Air Quality
- Airport Hazards
- Coastal Barrier Resources
- Coastal Zone Management
- Environmental Justice
WISER

- On-demand Learning Management System to teach the basics of an environmental review
- 15 self-paced modules with videos, audio, scenarios, and knowledge checks

https://www.hudexchange.info/trainings/wiser/
What is HEROS?

And where can I learn more about it?
What’s Your Experience with HEROS?

- Use it regularly
- Have tried it
- Totally new to it
What is HEROS?

• HEROS is an enterprise system that can be used to complete environmental reviews for all HUD programs (Part 50 and Part 58).
• HEROS replaces HUD’s current paper-based environmental review process with a comprehensive online tool.
  • HEROS walks users through the entire environmental review process from beginning to end, including compliance with 17 related environmental laws and authorities.
### Four Basic HEROS User Roles

<table>
<thead>
<tr>
<th>Role</th>
<th>Responsibilities</th>
</tr>
</thead>
</table>
| **HUD**        | • Complete Part 50 reviews  
                 • Approve, monitor Part 58 reviews                                           |
| **Responsible Entities** | • Complete Part 58 reviews                                                     |
| **Partners**   | • Assist HUD and REs with Part 50 and Part 58 reviews                             |
| **State Agencies** | • Act as HUD for certain Part 58 CPD programs  
                            • (Under construction)                                                      |
What’s Your Role in HEROS?

Responsible Entity
- Work with Partners?

Partner
- Consultant
- Recipient

HUD

State Agency acting as HUD

Don’t know?
HEROS Status – Part 58

- **CDBG, HOME, and SHOP**: Open to all CPD entitlement staff to complete all environmental reviews and partners who assist entitlement staff with environmental reviews
  - SHOP grantees without HEROS access are encouraged to submit information using the HEROS-Compatible Worksheets
- **CoC**: HEROS is not recommended for leasing or rental assistance
- **Public and Indian Housing**: Rollout to PHAs, Tribes, and their partners to begin soon
  - HEROS may be used for Part 58 reviews completed by REs who already have HEROS access
- **HUD intends to make HEROS mandatory for all CPD programs in 2020!**
When will HEROS be mandatory?

- HUD Staff: Already mandatory for all programs
- Entitlement Responsible Entities: Mandatory in 2020
- Partners: Mandatory now for Part 50 SHOP, Veterans, RAD, and 202 Program
- Other programs to follow
HEROS Access

- The HEROSInfo email account has been retired for all purposes except sending welcome emails to new users.
- All user access requests for REs and Partners should be submitted using the online HEROS Access Form.
Training materials on the HUD Exchange include:

- User Guide
- How-To Videos
- FAQs
- HUD Exchange “Ask A Question”
- Live Q&A Webinars
- HEROS Worksheets

Materials are available at: https://www.hudexchange.info/environmental-review/heros
HEROS - HUD Environmental Review Online System

HEROS Availability
HUD’s Office of Environment and Energy has developed an online system for developing, documenting, and managing environmental reviews. It covers all levels of environmental reviews for both Part 50 and Part 58 projects and includes on-screen guidance for completing HUD environmental reviews. HEROS is available to the following user types:

- Responsible Entity Users
- HUD Users
- Partner Users

Environmental Review Records
HEROS increases transparency of environmental reviews by posting them on the HUD Exchange for public review. Environmental assessments and categorically excluded projects completed through HEROS are posted online during public comment periods and archived for a year after completion.

Search Environmental Review Records

Questions?
If you need any assistance with HEROS, please submit your request through HUD Exchange Ask A Question so that HEROS system staff can assist you.

- HEROS user account/access issues
- Technical issues/errors in HEROS
- Questions about how to use HEROS

Ask a Question
FAQs

HEROS FAQs

How will I know when my review is approved by HUD?

Date Published: October 2017

When HUD has approved the Authority to Use Grant Funds (AUGF) in HEROS, HUD will assign the review back to the preparer. An email notification will be sent to you from your HUD Representative to notify you that the AUGF has been approved and that the review has been assigned to you. When you receive this email you will be able to access the ...

I determined that mitigation measures were required on a related law, but it’s not showing up in the Mitigation Measures and Conditions screen.

Date Published: October 2017

Return to the specific related law that is missing the information, using the side menu to return to the summary screen. Review the screen to make sure there is a response to the question that asks you to specify mitigation measures (normally right before the screen summary). If you don’t see a mitigation question, check your answers to the ...

I am working on a tiered review in HEROS. Why is my written strategy blank in the electronic environmental review record?

Date Published: October 2017

This is a known error and will be fixed in the Fall of 2017. For now, you may upload the written strategy as a Word document in the tiered review.

How does tiering work in HEROS?

Date Published: October 2017

The process for completing a tiered review in HEROS varies depending on the level of review of the project. HEROS only provides users with a format for tiered reviews that are categorically excluded subject to 58.5 (CE). Users who choose to tier Environmental Assessment (EA) or Environmental Impact Statement (EIS)-level reviews will be ...
Environmental Review Training

The Environmental Reviews Training webinars, held by HUD's Office of Environment and Energy, provide comprehensive information for grantees and staff on the various components of the environmental review process. All major topics are discussed by subject matter experts. HUD records all Environmental Review Training webinars; these webinar presentations and accompanying materials are available below.

---

**HEROS**

**HEROS User Guide**

These documents are user guides for HEROS.

Date: Published July 2019

**HEROS Quick Guides**

These documents are quick references and troubleshooting guides for HEROS.

Date: Published July 2019

**HEROS Part 50 Training for SHOP and VHRMP Grantees**

This webinar helped third party consultants, SHOP, and VHRMP grantees learn how to navigate through the HEROS system.

Date: Published May 2019

**HEROS "How To" Videos**

This series of short videos consists of brief, topic-specific tutorials that demonstrate how to use HEROS.

---

**Webinars and Training**

**Environmental Review Procedures and Resources**

**Related Laws and Authorities**

**HEROS**

**Historic Preservation and Tribal Consultation**

**Housing Trust Fund**

**Continuum of Care**

**Disaster Recovery**
Topics include:

- HEROS for SHOP and VHRMP Grantees
- HEROS for Partners (Part 58)
- HEROS for Tribes and Tribal Partners
- HEROS for Lead Hazard Control Grants
- HEROS for Public and Indian Housing (Part 50)
- Tiered Reviews in HEROS
- HEROS FAQs
HEROS "How To" Videos

HUD has developed a series of "How To" videos (formerly e-tutorials) to introduce and demonstrate the HUD Environmental Review Online System (HEROS). This series of short videos consists of brief, topic-specific tutorials that demonstrate how to use HEROS.

For more information on HEROS availability, visit the HEROS main page.

Introduction to HEROS

- HEROS: Getting Started

Performing an Environmental Review in HEROS

- Starting a New Environmental Review
- Assign Feature
- Determining Level of Review
- Related Federal Laws and Authorities
- Environmental Assessment Analysis
- Packaging and Previewing the Environmental Review Record
- Completing the Request for Release of Funds and Certification
- Authority to Use Grant Funds - 7015.16
- Certifying and Completing Part 50 Reviews
- Mitigation and Reevaluation of a Completed Review
- Completing Part 58 Reviews
- Working with Partners
- Using HEROS as a Partner

Performing a Tiered Environmental Review in HEROS

- Setting up a Broad-Level or Tier 1 Review
- Completing a Categorically Excluded Broad-Level or Tier 1 Review
- Adding a Site-Specific or Tier 2 Review

HEROS Administration and Special User Roles

- Administrative Functions in HEROS

Introduction to HEROS
HEROS USER GUIDE UPDATES

Date: June 2019

Since last HEROS User Guide update in August 2016, HUD has issued HEROS 11.13, 11.14, 11.15, 11.16, and 11.17 HEROS releases with the 11.18 release anticipated to launch in August 2019. These releases have introduced new system features and modifications to HEROS. This version of the HEROS User Guide includes editorial changes made throughout the document for clarity. This version also includes edits on the following topics:

Implementation of the Partner User Roles
Through the HEROS 11.14 release, HUD implemented the Partner User role to allow partners including consultants, contractors, public housing authorities, nonprofits, applicants, lenders, third-party providers, and others to access HEROS and assist HUD and Responsible Entities with the preparation of environmental reviews. This version of the HEROS User Guide provides additional guidance on the role of the Partner Users.

Addition of the Assign Review Features
Through the HEROS 11.14 release, HUD added the Assign Review feature to HEROS. Each environmental review is only assigned to one user, and only that assigned user can edit the review. This version of the HEROS User Guide provides guidance for assigning or reassigning reviews to other HEROS users, including HUD staff.

Modification of the New Request for Release of Funds and Authority to Use Grant Funds Screens
In the HEROS 11.14 release, HUD modified the way Responsible Entities submit the 7015.15 Request for Release of Funds in HEROS. Previously, after completing the 7015.15 RROF screen in HEROS or uploading the paper-based 7015.15 RROF form, RE users would enter the email address of the HUD representative to whom they intended to submit the 7015.15 RROF. The email feature has since been replaced with the Assign Review feature. Changes have also been made to how HUD users submit the 7015.16 Authority to Use Grant Funds to REs. This version of the HEROS User Guide provides guidance on both modifications.

All HEROS updates and announcements are provided on the HUD Exchange HEROS webpage:
https://www.hudexchange.info/programs/environmental-review/heros/
Environmental Review Partner Worksheets

Data Published: January 2018

Description

Environmental Review Partners (including applicants, consultants, contractors, nonprofits, and public housing authorities who assist with the environmental review process but may not legally take responsibility for completing an environmental review) may use the Partner Worksheets below to submit information on a project’s compliance with federal environmental laws and authorities.

These worksheets, along with all supporting documentation, should be submitted to the Responsible Entity or HUD Office that is responsible for completing the environmental review. These worksheets should be used only if the Partner does not have access to HEROS. View information on whether you are eligible for HEROS access.

Resource Links

- Project Information – Partner Worksheet (DOCX)
- Air Quality - Partner Worksheet (DOCX)
- Airport Hazards - Partner Worksheet (DOCX)
- Airport Runway Clear Zones - Partner Worksheet (DOCX)
- Coastal Barrier Resources Act - Partner Worksheet (DOCX)
- Coastal Zone Management Act - Partner Worksheet (DOCX)
- Endangered Species Act - Partner Worksheet (DOCX)
- Environmental Justice - Partner Worksheet (DOCX)
- Explosives - Partner Worksheet (DOCX)
- Farmlands - Partner Worksheet (DOCX)
- Flood Insurance - Partner Worksheet (DOCX)
- Floodplain Management - Partner Worksheet (DOCX)
- Historic Preservation - Partner Worksheet (DOCX)
- Noise (CEST) - Partner Worksheet (DOCX)
- Noise (EA) - Partner Worksheet (DOCX)
- Sole Source Aquifers - Partner Worksheet (DOCX)
- Contamination and Toxic Substances (Multifamily) - Partner Worksheet (DOCX)
- Contamination and Toxic Substances (Single) - Partner Worksheet (DOCX)
- Wetlands - Partner Worksheet (DOCX)
- Wild and Scenic Rivers - Partner Worksheet (DOCX)
- Housing Requirements - Partner Worksheet (DOCX)
- Environmental Assessment Factors and Analysis – Partner Worksheet (DOCX)
- Partner Worksheet for 223(a)(7) and CENST 223(f) (DOCX)
Ask questions and get help through **Ask a Question** on the HUD Exchange at: [https://www.hudexchange.info/get-assistance/my-question/](https://www.hudexchange.info/get-assistance/my-question/)

- Select “My question is related to: HEROS”
HEROS Production Environment

- “Real” HEROS: For environmental reviews of real projects only
- https://heros.hud.gov/heros

HEROS Training Environment

- Practice using HEROS: Enter reviews for training or demonstration purposes only
- https://cpd1.hud.gov/heros
HEROS - HUD Environmental Review Online System

HEROS Availability
HUD's Office of Environment and Energy has developed an online system for developing, documenting, and managing environmental reviews. It covers all levels of environmental reviews for both Part 50 and Part 58 projects and includes on-screen guidance for completing HUD environmental reviews. HEROS is available to the following user types:

- Responsible Entity Users
- HUD Users
- Partner Users

Environmental Review Records
HEROS increases transparency of environmental reviews by posting them on the HUD Exchange for public review. Environmental assessments and categorically excluded projects completed through HEROS are posted online during public comment periods and archived for a year after completion.

Search Environmental Review Records

Questions?
If you need any assistance with HEROS, please submit your request through HUD Exchange Ask A Question so that HEROS system staff can assist you.
- HEROS user account/access issues
- Technical issues/errors in HEROS
- Questions about how to use HEROS

Ask a Question

Resources
- HEROS Login
- Environmental Review Partner Worksheets
- FAQs

Training
- Webinars and "How To" Videos
- User Guide
- Quick Guides
- Practice Using HEROS
HEROS Login

Enter your Username (C***** or H***** or B******) and Password:

Username:

Password:

By using this U.S. Government information system you understand and consent to the following:

- The information system Rules of Behavior (RoB) provides the rules that govern the appropriate use of the information system for all government, contract personnel and other federally funded users. The RoB is intended to enhance and further define the specific rules each user must follow while accessing the information system and enforcing user understanding of:
  1. HUD's policy requiring a separation of duties between the requestor and approver for financial transactions;
  2. Prohibition from misusing the information system, i.e., exceeding their authority;

I agree to the Terms of Service

Login

If your account is locked, call the HITS National Help Desk at 1-888-297-8689, option 3, for a password reset.
Demo #1: CENST
- Tenant-based leasing program
- Continuum of Care (CoC) funds will be used to conduct tenant-based leasing throughout Portland, OR
HEROS integrates guidance and assistance into the environmental review format, but it is not a substitute for learning and understanding HUD’s environmental review process and all environmental laws and authorities addressed in this system. Responsible Entities are encouraged to attend regular environmental trainings led by HUD staff and ensure that they are familiar with all relevant environmental laws and authorities. HEROS users remain responsible for ensuring that their environmental review records are accurate and complete.

Start a new environmental review
Go to tiered reviews
Show AI
Show Reviews Assigned to Me

No records found.

Edit selected environmental review
View 7015.16 - Authority to Use Grant Funds
View selected environmental review
Assign Review

This HEROS version was deployed on Thu May 16, 2019 at 19:04

If your account is locked, call the HITS National Help Desk at 1-888-297-8689, option 3, for a password reset.
1101 – Review Type

HUD Environmental Review Online System (HEROS)

1101 – Review Type (50/58 - Non-Tiered)

Do you want to start a review under Part 50 or Part 58?

- Part 58 (when states, cities, tribes, or units of local government assume HUD’s environmental review responsibilities)
- Part 50 (when HUD staff is responsible for completion of the environmental review)

Cancel  Save and Continue

This HEROS version was deployed on Thu May 16, 2019 at 19:04
1105 – Initial Screen

HUD Environmental Review Online System (HEROS)

**1105 – Initial Screen (50/58 - Non-Tiered)**

Environmental Review Record created on September 27, 2019 by Liz Zepeda

- Indicates that field is required

- **Project Name:**

- **HUD Funding Source:**
  Include only funding sources for which this review will fulfill HUD's environmental review requirements. Do not include funding sources that will require a separate environmental review (e.g. if this project receives funding from both Part 50 and Part 58 programs).

<table>
<thead>
<tr>
<th>Grant/Project Identification Number</th>
<th>HUD Program</th>
<th>Program Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>[Blank]</td>
<td>Select Program</td>
<td>Select Program</td>
</tr>
</tbody>
</table>

- **Add Another Funding Source**

- **Estimated Total HUD Funded, Assisted, or Insured Amount($):**

- **Estimated Total Project Cost:**
  This may be the same as the total HUD-funded, assisted, or insured amount

- **Does this project anticipate the use of funds or assistance from another Federal agency in addition to HUD?**
  [ ] No  [ ] Yes
1105 – Initial Screen (50/58 - Non-Tiered)

Environmental Review Record created on September 27, 2019 by Liz Zepeda.

* Indicates that field is required

* Project Name: CoC TBL Portland FY2019

* HUD Funding Source:
Include only funding sources for which this review will fulfill HUD’s environmental review requirements. Do not include funding sources that will require a separate environmental review (e.g. if this project receives funding from both Part 50 and Part 58 programs).

<table>
<thead>
<tr>
<th>Grant/Project Identification Number</th>
<th>HUD Program</th>
<th>Program Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>CoC-OR-500</td>
<td>Community Planning and Development (CPD)</td>
<td>Continuum of Care Program</td>
</tr>
</tbody>
</table>

Add Another Funding Source

* Estimated Total HUD Funded, Assisted, or Insured Amount($): $ 20,000,000

* Estimated Total Project Cost: $ 20,000,000
This may be the same as the total HUD-funded, assisted, or insured amount.

* Does this project anticipate the use of funds or assistance from another Federal agency in addition to HUD?
  - No
  - Yes

State / Local Identifier [optional]:

Responsible Entity (RE) Information:
  Organization Name: PORTLAND
  Address: 1220 SW 5th Ave
1120 – Sensitive Info

HUD Environmental Review Online System (HEROS)

My Environmental Reviews  Reports  Admin  Logout

Assign Review

Initial Screen  Project Summary  Level of Review  Determination  Related Laws and Authorities  Mitigation Measures and Conditions

1120 - Sensitive Information (50/58)  Project Name: CoC-TBL-Portland-FY2019

While it is important that HUD assistance undergo the requisite environmental review and transparency requirements, it is equally important that information that may endanger certain types of projects, such as domestic violence shelters, is not publicly disclosed. To reduce the risk of violence or other harm at sensitive sites undergoing environmental review compliance for the use of HUD assistance, HUD has implemented certain preventative measures.

If the nature of this project should be kept confidential, indicate that fact here.

- This project type is not sensitive and need not be kept confidential.
- This project type is sensitive and must be kept confidential.

Save and Go Back  Save and Continue

This HEROS version was deployed on Thu May 16, 2019 at 19:04
Description of the Proposed Project [24 CFR 50.12; 24 CFR 58.32; 40 CFR 1508.25]:

Provide a project description that captures the maximum anticipated scope of the proposal. It should include all contemplated actions which logically are, either geographically or functionally, a composite part of the project, regardless of the source of funding. Describe all physical aspects of the project, such as plans for multiple phases of development, size and number of buildings, and activities to be undertaken. Include details of the physical impacts of the project, including whether there will be ground disturbance. If applicable, indicate whether the project site will acquire or if the sponsor already has ownership. If there is not enough space below, or if there are additional documents required to supplement this review, upload them below.

This is a programmatic environmental review for the Portland Continuum of Care (OR-500) which covers tenant-based leasing grants only. Grants covered by this review are limited to tenant-based leasing activities without any associated repairs, rehabilitation, new construction, or other activities with physical impacts. This review only covers tenant-based leasing grants where all program participants select the location of their units, which are preexisting residential units not associated with acquisition or any ground disturbing activities. This review also covers administrative costs associated with dispensing the grants and supportive services provided to tenants. It does not cover project-based or sponsor-based rental assistance grants.

Project Location:

Provide a street address for your project and validate the address using the button below. If the project location is sensitive, you may provide an alternative address, such as the address of your city hall or nonprofit in lieu of the exact location of the project. If you cannot validate the address now, be sure to do so before completing the review.

If the project affects a large area, such as an infrastructure or community services project, select a representative address and describe the project location in a narrative in the provided textbox.

Street: 123 Main Street  City: Portland

State: Oregon  Zip: 99999

Validate Address

Location Information:

This is a programmatic environmental review for the entire Portland Continuum of Care (OR-500) which covers COC tenant-based units located within the City of Portland, OR. The location listed is the address of Strategies to End Homelessness, which is the COC Lead Agency and point of contact for the Portland Continuum of Care.

Upload

Field Inspection

If a site visit was conducted, complete the following section.
Save your work often!

1125 - Project Summary (50/58)

Description of the Proposed Project [24 CFR 50.12; 24 CFR 58.32; 40 CFR 1508.25]:

Provide a project description that captures the maximum anticipated scope of the proposal. It should include all contemplated actions which logically are, either geographically or functionally, a composite part of the project, regardless of the source of funding. Describe all physical aspects of the project, such as plans for multiple phases of development, size and number of buildings, and activities to be undertaken. Include details of the physical impacts of the project, including whether there will be ground disturbance. If applicable, indicate whether the project site will require acquisition or if the sponsor already has ownership. If there is not enough space below, or if there are additional documents required to supplement this review, upload them below.

This is a programmatic environmental review for the Portland Continuum of Care (OR-500) which covers tenant-based leasing grants only. Grants covered by this review are limited to tenant-based leasing activities without any associated repairs, rehabilitation, new construction, or other activities with physical impacts. This review only covers tenant-based leasing grants where all program participants select the location of the project. This review also covers any ground disturbing activities. It does not cover project-based grants or services provided to tenants. It does not cover project-based grants or services provided to tenants.

Project Location:

Provide a street address for your project and validate the address using the button below. If the project location is sensitive, you may provide an alternative address, such as the address of your city hall or nonprofit in lieu of the exact location of the project. If you cannot validate the address now, be sure to do so before completing the review.

If the project affects a large area, such as an infrastructure or community services project, select a representative address and describe the project location in a narrative in the provided textbox.

Street: 123 Main Street

City: Portland
What level of review is required by the scope of the project?

For more information on determining the appropriate level of review, go to
https://www.hudexchange.info/programs/environmental-review/orientation-to-environmental-reviews/#level-of-review

☐ Exempt

Select appropriate citation(s) from 24 CFR 58.34(a) (Check all that apply)

☐ Environmental and other studies, resource identification and the development of plans and strategies. 24 CFR 58.34(a)(1)
☐ Information and financial services. 24 CFR 58.34(a)(2)
☐ Administrative and management activities. 24 CFR 58.34(a)(3)
☐ Public services that will not have a physical impact or result in any physical changes, including but not limited to services concerned with employment, crime prevention, child care, health, drug abuse, education, counseling, energy conservation and welfare or recreational needs. 24 CFR 58.34(a)(4)
☐ Inspections and testing of properties for hazards or defects. 24 CFR 58.34(a)(5)
☐ Purchase of insurance. 24 CFR 58.34(a)(6)
☐ Purchase of tools. 24 CFR 58.34(a)(7)
☐ Engineering or design costs. 24 CFR 58.34(a)(8)
☐ Technical assistance and training. 24 CFR 58.34(a)(9)
☐ Assistance for temporary or permanent improvements that do not alter environmental conditions and are limited to protection, repair, or restoration activities necessary only to control or arrest the effects from disasters or imminent threats to public safety including those resulting from physical deterioration. 24 CFR 58.34(a)(10)
☐ Payment of principal and interest on loans made or obligations guaranteed by HUD. 24 CFR 58.34(a)(11)

☒ Categorical exclusion not subject to the Federal laws and authorities cited in §58.5 (CENST)

Select appropriate citation(s) from 24 CFR 58.35(b) (Check all that apply)

☒ Tenant-based rental assistance. 24 CFR 58.35(b)(1)
☒ Supportive services including, but not limited to, health care, housing services, permanent housing placement, day care, nutritional services, short-term payments for rent/mortgage/utility costs, and assistance in gaining access to local, State, and Federal government benefits and services. 24 CFR 58.35(b)(2)
☐ Operating costs including maintenance, security, operation, utilities, furnishings, equipment, supplies, staff training and recruitment and other incidental costs.
☐ 24 CFR 58.35(b)(3)
☐ Economic development activities, including but not limited to, equipment purchase, inventory financing, interest subsidy, operating expenses and similar costs not associated with construction or expansion of existing operations. 24 CFR 58.35(b)(4)
☐ Activities to assist homebuyers to purchase existing dwelling units or dwelling units under construction, including closing costs and down payment assistance, interest buydowns, and similar activities that result in the transfer of title. 24 CFR 58.35(b)(5)
☐ Affordable housing pre-development costs including legal, consulting, developer and other costs related to obtaining site options, project financing, administrative costs and fees for loan commitments, zoning approvals, and other related activities which do not have a physical impact. 24 CFR 58.35(b)(6)
☐ Approval of supplemental assistance 24 CFR 58.35(b)(7)
☐ This activity is CENST Supplemental Assistance if the approval is made by the same responsible entity that conducted the environmental review on the original project and reevaluation of the environmental findings is not required under Sec. 58.47.

☒ Categorical exclusion subject to the Federal laws and authorities cited in §58.5 (CEST)
Based on your responses in the Level of Review Determination Section, this project falls under the category of categorically excluded not subject to §58.5 (CENST)

§58.35(b)(1), §58.35(b)(2), §58.35(b)(3)

* Check the citation(s) above and confirm that this project should be reviewed as CENST and not subject to the Federal laws and authorities cited in §58.5.

- Yes, this project falls into the category indicated above
- No

[Go Back] [Save and Continue]
2005 – Related Laws and Authorities

### 2005 – Related Federal Laws and Authorities Summary (50/58)  
**Project Name:** CoC-TBL-Portland-FY2019

**Directions:** Click on the Compliance Factor links in the first column in the chart below. The links will take you to a separate screen to answer questions and provide documentation on the specific Compliance Factor. After completing each Compliance Factor screen you will automatically return to this screen to continue.

<table>
<thead>
<tr>
<th>Compliance Factors</th>
<th>Are formal compliance steps or mitigation required?</th>
<th>Compliance Determinations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Statutes, Executive Orders, and Regulations Listed at 24 CFR §50.4 &amp; 58.6</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Airport Runway Clear Zones [24 CFR part 51]</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Coastal Barrier Resources [Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]]</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Flood Insurance [Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]]</td>
<td>Yes</td>
<td>No</td>
</tr>
</tbody>
</table>

[Image of a slide from a presentation]
1. Does the project involve the sale or acquisition of developed property?

- No
- Yes

Screen Summary

Compliance Determination

Describe the basis that led to your determination here, identifying all key elements from your support documentation that substantiate your determination. The following minimum language is based on your responses in this section. You are strongly encouraged to edit this language to provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

This project is limited leasing and includes no activities that would require further evaluation under this section. The project is in compliance with Airport Runway Clear Zone requirements.

Supporting documentation

Upload all supporting documents required in this section here:  

Are formal compliance steps or mitigation required?

Only Responsible Entity (for Part 58) or HUD (for Part 50) Users may respond to this question. Ensure that this question is complete before finalizing the review.

- Yes
- No
## 2005 – Related Laws and Authorities

### 2005 – Related Federal Laws and Authorities Summary (50/58)

**Project Name:** CoC-TBL-Portland-FY2019

**Directions:** Click on the Compliance Factor links in the first column in the chart below. The links will take you to a separate screen to answer questions and provide documentation on the specific Compliance Factor. After completing each Compliance Factor screen you will automatically return to this screen to continue.

<table>
<thead>
<tr>
<th>Compliance Factors</th>
<th>Are formal compliance steps or mitigation required?</th>
<th>Compliance Determinations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 &amp; 58.6</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Airport Runway Clear Zones</strong> [24 CFR part 51]</td>
<td>○ Yes ☺ No</td>
<td>This project is limited leasing and includes no activities that would require further evaluation under this section. The project is in compliance with Airport Runway Clear Zone requirements.</td>
</tr>
<tr>
<td><strong>Coastal Barrier Resources</strong> [Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]]</td>
<td>○ Yes ☺ No</td>
<td></td>
</tr>
<tr>
<td><strong>Flood Insurance</strong> [Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]]</td>
<td>○ Yes ☺ No</td>
<td></td>
</tr>
</tbody>
</table>

**Cancel Review**

**Save and Continue**
2015 - Coastal Barrier Resources Act (50/58)  Project Name: CoC-TBL-Portland-FY2019

<table>
<thead>
<tr>
<th>General Requirements</th>
<th>Legislation</th>
<th>Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>HUD financial assistance may not be used for most activities in units of the Coastal Barrier Resources System (CBRS). See 16 USC 3504 for limitations on Federal expenditures affecting the CBRS.</td>
<td>Coastal Barrier Resources Act (CBRA) of 1982, as amended by the Coastal Barrier Improvement Act of 1990 (16 USC 3501)</td>
<td>(none)</td>
</tr>
</tbody>
</table>

Reference
https://www.onecpd.info/environmental-review/coastal-barrier-resources

Note that if you change answers on this screen, make sure to press "Next" button in order for the information to save and proceed to the appropriate next question.

This project is located in a state that does not contain CBRA units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.

Screen Summary
Compliance Determination
This project is located in a state that does not contain CBRS units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.

Supporting documentation
Upload all supporting documents required in this section here: Upload File

Are formal compliance steps or mitigation required?
Only Responsible Entity (for Part 58) or HUD (for Part 50) Users may respond to this question. Ensure that this question is complete before finalizing the review.

- Yes
- No
### General Requirements

Certain types of federal financial assistance may not be used in floodplains unless the community participates in National Flood Insurance Program and flood insurance is both obtained and maintained.

<table>
<thead>
<tr>
<th>Legislation</th>
<th>Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Flood Disaster Protection Act of 1973 as amended (42 USC 4001-4128)</td>
<td>24 CFR 50.4(b)(1) and 24 CFR 58.6(a) and (b); 24 CFR 55.1(b).</td>
</tr>
</tbody>
</table>

### Reference

https://www.onecpd.info/environmental-review/flood-insurance

Note that if you change answers on this screen, make sure to press “Next” button in order for the information to save and proceed to the appropriate next question.

---

1. Does this project involve mortgage insurance, refinance, acquisition, repairs, rehabilitation, or construction of a structure, mobile home, or insurable personal property?

   - No. This project does not require flood insurance or is excepted from flood insurance.
   - Yes

---

### Screen Summary

**Compliance Determination**

Describe the basis that led to your determination here, identifying all key elements from your support documentation that substantiate your determination. The following minimum language is based on your responses in this section. You are strongly encouraged to edit this language to provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

Based on the project description the project includes no activities that would require further evaluation under this section. The project does not require flood insurance or is excepted from flood insurance. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with Flood Insurance requirements.

Directions: Click on the Compliance Factor links in the first column in the chart below. The links will take you to a separate screen to answer questions and provide documentation on the specific Compliance Factor. After completing each Compliance Factor screen you will automatically return to this screen to continue.

<table>
<thead>
<tr>
<th>Compliance Factors</th>
<th>Are formal compliance steps or mitigation required?</th>
<th>Compliance Determinations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 &amp; 58.6</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Airport Runway Clear Zones</strong> [24 CFR part 51]</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>This project is limited leasing and includes no activities that would require further evaluation under this section. The project is in compliance with Airport Runway Clear Zone requirements.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Coastal Barrier Resources</strong> [Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]]</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>This project is located in a state that does not contain CBRS units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Flood Insurance</strong> [Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]]</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Based on the project description the project includes no activities that would require further evaluation under this section. The project does not require flood insurance or is exempt from flood insurance. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with Flood Insurance requirements.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Before proceeding with this screen, review to ensure that you have completed all preceding screens. The mitigation measures and conditions below are generated from information provided in the Law and Authority and EA Factor screens, so it is important that all previous screens be finalized before continuing.

Review the mitigation measures and conditions required of this project below.

<table>
<thead>
<tr>
<th>Law, Authority, or Factor</th>
<th>Mitigation Measure or Condition</th>
</tr>
</thead>
<tbody>
<tr>
<td>No records found.</td>
<td></td>
</tr>
</tbody>
</table>

To insert additional mitigation measures or conditions not listed here, click the "Add Mitigation Measure or Condition" button above. If no mitigation measures are required, you may continue to the next page. Otherwise, describe the Mitigation Plan below.

**Mitigation Plan**

Explain how the above mitigation measures and conditions will be carried out and monitored. Clearly identify both the persons responsible for implementing and monitoring mitigation measures and the timeframe in which they will be completed. These measures and conditions must be incorporated into project contracts, development agreements and other relevant documents. (40 CFR 1505.2(c))
Generate and review the preview of the environmental review record, taking special care to ensure that all questions have complete and accurate responses and all supporting documentation. It is your responsibility to ensure that your review is complete. If necessary, use the menu on the left side of this screen to navigate through and edit the previous screens.
Environmental Review
for Activity/Project that is Exempt or
Categorically Excluded Not Subject to Section 58.5
Pursuant to 24 CFR 58.34(e) and 58.35(b)

Project Information

Project Name: CoC-TBL-Portland-FY2019
HEROS Number: 900000010031657

Responsible Entity (RE): PORTLAND, 1220 SW 5th Ave Portland OR, 97204

State / Local Identifier: 

RE Preparer: Liz Zepeda

Grant Recipient (if different than Responsible Entity): Strategies to End Homelessness

Point of Contact: John Doe

Consultant (if applicable):

Point of Contact:

Project Location: 123 Main Street, Portland, OR 99999

Additional Location Information:
This is a programmatic environmental review for the entire Portland Continuum of Care (OR-500) which covers CCC tenant-based units located within the City of Portland, OR. The location listed is the address of Strategies to End Homelessness, which is the CoC Lead Agency and point of contact for the Portland Continuum of Care.

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]: This is a programmatic environmental review for the Portland Continuum of Care (OR-500) which covers CCC tenant-based leasing grants only. Grants covered by this review are limited to tenant-based leasing activities without any associated repairs, rehabilitation, new construction, or other activities with physical impacts. This review only covers tenant-based leasing grants where all program participants select the location of their units, which are preexisting residential units not associated with acquisition or any ground disturbing activities. This review also covers administrative costs associated with dispensing the grants and supportive services provided to tenants. It does not cover project-based or sponsor-based rental assistance grants.

Level of Environmental Review Determination:
Activity / Project is Categorically Excluded Not Subject to per 24 CFR 58.35(b):
58.35(b)(1)
58.35(b)(2)
58.35(b)(3)

Signature Page

Funding Information

Grant / Project Identification Number
CoC-OR-500
HUD Program
Community Planning and Development (CPD)
Program Name
Continuum of Care Program

Estimated Total HUD funded, Assisted or Insured Amount:
$20,000,000.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]:
$20,000,000.00

Compliance with 24 CFR §50.4 & §58.6 Laws and Authorities

| Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4 & §58.6 |
| Are formal compliance steps or mitigation required? |
| Compliance determination (See Appendix A for source determinations) |

STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & §58.6

Airport Runway Clear Zones and Clear Zones 24 CFR part 51

☐ Yes ☐ No This project is limited leasing and includes no activities that would require further evaluation under this section. The project is in compliance with Airport Runway Clear Zone requirements.

Coastal Barrier Resources Act Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]

☐ Yes ☐ No This project is located in a state that does not contain CBRS units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.

Flood Insurance

☐ Yes ☐ No Based on the project description the
6222 – Exempt and CENST Signature Screen (50/58)

Project Name: CoC-TBL-Portland-FY2019

**Step One:**
Print the signature page. After the necessary signatures are obtained, scan and upload the document.

**Step two:**
Indicate the date the Environmental Review Record was signed:

**Step Three:**
Generate your final Environmental Review Record for your records.

Go Back

Mark Review Complete
Environmental Review for Activity/Project that is Exempt or Categorically Excluded Not Subject to Section 58.5 Pursuant to 24 CFR 58.34(a) and 58.35(b)

Project Information

Project Name: CoC-TBL-Portland-FY2019
HEROS Number: 900000010031657

State / Local Identifier:
Project Location: 123 Main Street, Portland, OR 99999

Additional Location Information:
This is a programmatic environmental review for the entire Portland Continuum of Care (OR-500) which covers COC tenant-based units located within the City of Portland, OR. The location listed is the address of Strategies to End Homelessness, which is the CoC Lead Agency and point of contact for the Portland Continuum of Care.

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:
This is a programmatic environmental review for the Portland Continuum of Care (OR-500) which covers tenant-based leasing grants only. Grants covered by this review are limited to tenant-based leasing activities without any associated repairs, rehabilitation, new construction, or other activities with physical impacts. This review only covers tenant-based leasing grants where all program participants select the location of their units, which are preexisting residential units not associated with acquisition or any ground disturbing activities. This review also covers administrative costs associated with dispensing the grants and supportive services provided to tenants. It does not cover project-based or sponsor-based rental assistance grants.

Level of Environmental Review Determination:
Activity / Project is Categorically Excluded Not Subject to per 24 CFR 58.35(b):
58.35(b)(1)
58.35(b)(2)
58.35(b)(3)

Mitigation Measures and Conditions (CFR 1505.2(c)):
Summarized below are all mitigation measures adopted by the Responsible Entity to reduce, avoid or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

<table>
<thead>
<tr>
<th>Law, Authority, or Factor</th>
<th>Mitigation Measure or Condition</th>
<th>Comments on Completed Measures</th>
<th>Complete</th>
</tr>
</thead>
</table>

Preparer Signature: ___________________________ Date: ______________

Name / Title / Organization: Liz Zepeda / PORTLAND

Responsible Entity Agency Official Signature: ___________________________ Date: ______________

Name / Title: ___________________________

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environment Review Record (ERR) for the activity / project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).
Step One:
Print the signature page. After the necessary signatures are obtained, scan and upload the document.

- Print Signature Page
- Upload signed signature page: [Upload]

CoC Signature Page.pdf [X]

Step two:
Indicate the date the Environmental Review Record was signed: [09/27/2019]

Step Three:
Generate your final Environmental Review Record for your review.

- Generate Final Environmental Review Record

[Go Back] [Mark Review Complete]
Completed review can still be edited unless they are assigned to another user.
Demo #2: Multifamily Rehab
Project Scenario: Trailside Apartments

- Rehabilitation of two 2-story multifamily buildings and one single-story multifamily building
- The work will include updating doors, windows, and common areas in the complex
- Inside the apartments, the kitchens, bathrooms, and associated plumbing will be updated
- The project will include repaving a parking lot, updating a play area, and constructing a picnic area
• Project Name – Trailside Apartment Rehabilitation
• Funding –
  • $1 million in HOME funds
  • $500K in CDBG funds
1105 – Initial Screen (50/58 - Non-Tiered)

Environmental Review Record created on September 06, 2019 by Liz Zepeda.

Indicates that field is required

**Project Name:** Trailside Apartments

**HUD Funding Source:**
Include only funding sources for which this review will fulfill HUD’s environmental review requirements. Do not include funding sources that will require a separate environmental review (e.g. if this project receives funding from both Part 50 and Part 58 programs).

<table>
<thead>
<tr>
<th>Grant/Project Identification Number</th>
<th>HUD Program</th>
<th>Program Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>A-19-MC-27-000</td>
<td>Community Planning and Development (CPD)</td>
<td>Community Development Block Grants (CDBG) (Entitlement)</td>
</tr>
<tr>
<td>B-19-BL-52-000†</td>
<td>Community Planning and Development (CPD)</td>
<td>HOME Program</td>
</tr>
</tbody>
</table>

**Estimated Total HUD Funded, Assisted, or Insured Amount($):** 1,500,000

**Estimated Total Project Cost:** 1,500,000

This may be the same as the total HUD-funded, assisted, or insured amount.

**Does this project anticipate the use of funds or assistance from another Federal agency in addition to HUD?**
- No
- Yes

**State / Local Identifier [optional]:**

**Responsible Entity (RE) Information:**
- **Organization Name:** LAKewood
- **Address:** 6000 Main St SW
  Lakewood
While it is important that HUD assistance undergo the requisite environmental review and transparency requirements, it is equally important that information that may endanger certain types of projects, such as domestic violence shelters, is not publicly disclosed. To reduce the risk of violence or other harm at sensitive sites undergoing environmental review compliance for the use of HUD assistance, HUD has implemented certain preventative measures.

If the nature of this project should be kept confidential, indicate that fact here.

- This project type is not sensitive and need not be kept confidential.
- This project type is sensitive and must be kept confidential.

Save and Go Back  Save and Continue
1125 – Project Summary

• Project Location –
  • 12569 47th Ave SW, Lakewood, WA 98499

• Project Activities –
  • Rehabilitation
  • No change in land use
  • Residential – Multifamily
**Description of the Proposed Project [24 CFR 50.12; 24 CFR 58.32; 40 CFR 1508.25]:**

Provide a project description that captures the maximum anticipated scope of the proposal. It should include all contemplated actions which logically are, either geographically or functionally, a composite part of the project, regardless of the source of funding. Describe all physical aspects of the project, such as plans for multiple phases of development, size and number of buildings, and activities to be undertaken. Include details of the physical impacts of the project, including whether there will be ground disturbance. If applicable, indicate whether the project site will require acquisition or if the sponsor already has ownership. If there is not enough space below, or if there are additional documents required to supplement this review, upload them below.

The purpose of this project is to rehabilitate two 2-story multifamily buildings and one single-story multifamily building in a single complex. The work will include updating doors and windows, as well as common areas in the complex. Inside the apartments, the kitchens and bathrooms will be updated, along with associated plumbing. In addition, the project will include repaving a parking lot, updating a play area, and constructing a picnic area.

This project will be funded with a combination of HOME ($1 million) and CDBG ($500,000) funds. The City of Lakewood is the entitlement recipient of these funds and the Responsible Entity.

**Project Location:**

Provide a street address for your project and validate the address using the button below. If the project location is sensitive, you may provide an alternative address, such as the address of your city hall or nonprofit in lieu of the exact location of the project. **If you cannot validate the address now, be sure to do so before completing the review.**

If the project affects a large area, such as an infrastructure or community services project, select a representative address and describe the project location in a narrative in the provided textbox.

**Street:** 12569 47th Ave SW  
**City:** Lakewood  
**State:** Washington  
**Zip:** 98499

[Validate Address]

Location Information:

[Upload]

Site Photos_3-30-16.docx ✗
• Project currently consists of 30 units. After the rehabilitation is complete, there will be 34 units.
• The cost of the rehabilitation is $1.5 million, and the cost of replacement after rehab is $2.1 million.

24 CFR 58.35(a)(3)(ii)
Rehabilitation of multifamily (5 or more units) residential buildings is CEST if unit density is not changed more than 20 percent; the project does not involve changes in land use from residential to non-residential; and the estimated cost of rehabilitation is less than 75 percent of the total estimated cost of replacement after rehabilitation.
What level of review is required by the scope of the project?

For more information on determining the appropriate level of review, go to https://www.hudexchange.info/programs/environmental-review/orientation-to-environmental-reviews/#level-of-review

Exempt

Select appropriate citation(s) from 24 CFR 58.34(a): (Check all that apply)

- Environmental and other studies, resource identification and the development of plans and strategies. 24 CFR 58.34(a)(1)
- Information and financial services. 24 CFR 58.34(a)(2)
- Administrative and management activities. 24 CFR 58.34(a)(3)
- Public services that will not have a physical impact or result in any physical changes, including but not limited to services concerned with employment, crime prevention, child care, health, drug abuse, education, counseling, energy conservation and welfare or recreational needs. 24 CFR 58.34(a)(4)
- Inspections and testing of properties for hazards or defects. 24 CFR 58.34(a)(5)
- Purchase of insurance. 24 CFR 58.34(a)(6)
- Purchase of tools. 24 CFR 58.34(a)(7)
- Engineering or design costs. 24 CFR 58.34(a)(8)
- Technical assistance and training. 24 CFR 58.34(a)(9)
- Assistance for temporary or permanent improvements that do not alter environmental conditions and are limited to protection, repair, or restoration activities necessary only to control or arrest the effects from disasters or imminent threats to public safety including those resulting from physical deterioration. 24 CFR 58.34(a)(10)
- Payment of principal and interest on loans made or obligations guaranteed by HUD. 24 CFR 58.34(a)(11)

Categorical exclusion not subject to the Federal laws and authorities cited in §58.5 (CENST)

Select appropriate citation(s) from 24 CFR 58.35(b): (Check all that apply)

- Tenant-based rental assistance. 24 CFR 58.35(b)(1)
  Supportive services including, but not limited to, health care, housing services, permanent housing placement, day care, nutritional services, short-term payments for rent/mortgage/utility costs, and assistance in gaining access to local, State, and Federal government benefits and services. 24 CFR 58.35(b)(2)
  Operating costs including maintenance, security, operation, utilities, furnishings, equipment, supplies, staff training and recruitment and other incidental costs. 24 CFR 58.35(b)(3)
- Economic development activities, including but not limited to, equipment purchase, inventory financing, interest subsidy, operating expenses and other costs including the acquisition and development of properties. 24 CFR 58.35(b)(4)
Rehabilitation of public facilities and improvements other than buildings 24 CFR 58.35(a)(1)
This activity is CEST if the facilities and improvements are in place and retained in the same use without change in size or capacity of more than 20 percent. Acceptable activities include replacement of water or sewer lines, reconstruction of curbs and sidewalks, and repaving of streets.

Rehabilitation of residential buildings with one to four units 24 CFR 58.35(a)(3)(i)
This activity is CEST if the density is not increased beyond four units, the land use is not changed, and the footprint of the building is not increased in a floodplain or wetland.

Rehabilitation of multifamily (5 or more units) residential buildings 24 CFR 58.35(a)(3)(ii)
This activity is CEST if unit density is not changed more than 20 percent; the project does not involve changes in land use from residential to nonresidential; and the estimated cost of rehabilitation is less than 75 percent of the total estimated cost of replacement after rehabilitation.

Rehabilitation of non-residential structures including commercial, industrial, and public buildings 24 CFR 58.35(a)(3)(iii)
This activity is CEST if the facilities and improvements are in place and will not be changed in size or capacity by more than 20 percent; and the activity does not involve a change in land use, such as from non-residential to residential, commercial to industrial, or from one industrial use to another.

Individual Actions

☐ An individual action on up to four dwelling units. 24 CFR 58.35(a)(4)(i)
This activity is CEST where there is a maximum of four units on any one site. The units can be four one-unit buildings or one four-unit building or any combination in between.

☐ An individual action on a project of five or more housing units. 24 CFR 58.35(a)(4)(ii)
This activity is CEST when the housing units are developed on scattered sites, the site are more than 2,000 feet apart, and there are not more than four housing units on any one site.

Disposition

☐ Disposition of an existing structure provided that the disposed of structure will be retained for the same use. 24 CFR 58.35(a)(5)

Equity Loans

☐ Equity loans on an existing structure provided that the financed structure will be retained for the same use. 24 CFR 58.35(a)(5)

Environmental Assessment (EA)
This activity requires an EA if no categorical exclusions or exemptions apply. An EA may also be required if extraordinary circumstances apply.

Environmental Impact Statement (EIS)

☐ Not sure
If the level of review is not known select this option to go to the Level of Review Determination Assistant.
1. Does this project affect or provide site or capacity for a total 2,500 or more housing units or beds, such that 24 CFR 58.37 would require completion of an EIS?
   - Yes
   - No

4. Is this repair, improvement, or rehabilitation necessary due to a disaster or imminent threat to public safety?
   - Yes
   - No

5. After completion of the project, will the size or capacity of the property increase or decrease by more than 20%?
   - Yes
   - No

6. Is the estimated cost of repair, improvement, or rehabilitation of the multifamily residential building(s) less than 75% of the total estimated cost of replacement after rehabilitation?
   - Yes
   - No
<table>
<thead>
<tr>
<th>Compliance Factors</th>
<th>Are formal compliance steps or mitigation required?</th>
<th>Compliance Determinations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 &amp; 58.6</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Airport Hazards</strong> [Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D]</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td><strong>Coastal Barrier Resources</strong> [Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]]</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td><strong>Flood Insurance</strong> [Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]]</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td><strong>Air Quality</strong> [Clean Air Act, as amended, particularly section 176(c) &amp; (d); 40 CFR Parts 6, 51, 93]</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td><strong>Coastal Zone Management</strong> [Coastal Zone Management Act, sections 307(c) &amp; (d)]</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td><strong>Contamination and Toxic Substances - Multifamily and Nonresidential Properties</strong> [24 CFR 50.3(i) &amp; 58.5(i)(2)] (HUD Standard)</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td><strong>Endangered Species</strong> [Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402]</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td><strong>Explosive and Flammable Hazards</strong> [Above-Ground Tanks][24 CFR Part 51 Subpart C]</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td><strong>Farmlands Protection</strong> [Farmland Protection Policy Act of 1981, particularly sections 1504(b) &amp; 1541; 7 CFR Part 658]</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td><strong>Floodplain Management</strong> [Executive Order 11988, particularly section 2(a); 24 CFR Part 55]</td>
<td>Yes</td>
<td>No</td>
</tr>
</tbody>
</table>
Airport Hazards

- Project is located .3 miles from McChord Air Force Base
- Project is not located within the APZ
General Requirements | Legislation | Regulation
---|---|---
It is HUD's policy to apply standards to prevent incompatible development around civil airports and military airfields. | (none) | 24 CFR Part 51 Subpart D

Reference
https://www.onecpd.info/environmental-review/airport-hazards

Note that if you change answers on this screen, make sure to press "Next" button in order for the information to save and proceed to the appropriate next question.

1. To ensure compatible land use development, you must determine your site's proximity to civil and military airports. Is your project within 15,000 feet of a military airport or 2,500 feet of a civilian airport?
- No
- Yes

2. Is your project located within a Runway Projection Zone/Clear Zone (RPZ/CZ) or Accident Potential Zone (APZ)?
- Yes, project is in an APZ
- Yes, project is an RPZ/CZ
- No, project is not within an APZ or RPZ/CZ
Coastal Barrier Resources

- There are no CBRS Units in Washington State
## 2015 - Coastal Barrier Resources Act (50/58)

### Project Name: Trailside-Apartments

<table>
<thead>
<tr>
<th>General Requirements</th>
<th>Legislation</th>
<th>Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>HUD financial assistance may not be used for most activities in units of the Coastal Barrier Resources System (CBRS). See 16 USC 3504 for limitations on Federal expenditures affecting the CBRS.</td>
<td>Coastal Barrier Resources Act (CBRA) of 1982, as amended by the Coastal Barrier Improvement Act of 1990 (16 USC 3501)</td>
<td>(none)</td>
</tr>
</tbody>
</table>

### Reference

https://www.onecpd.info/environmental-review/coastal-barrier-resources

Note that if you change answers on this screen, make sure to press “Next” button in order for the information to save and proceed to the appropriate next question.

This project is located in a state that does not contain CBRA units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.

### Screen Summary

**Compliance Determination**

This project is located in a state that does not contain CBRS units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.

**Supporting documentation**

Upload all supporting documents required in this section here: [Upload File]

Are formal compliance steps or mitigation required?
Only Responsible Entity (for Part 58) or HUD (for Part 50) Users may respond to this question. Ensure that this question is complete before finalizing the review.

- [ ] Yes
- [x] No
- A portion of the site is located within the 100-Year Floodplain, but all **structures** are in the 500-Year Floodplain or outside the floodplain.
## 2040 - Flood Insurance (50/58)

### Project Name: Trailside-Apartments

<table>
<thead>
<tr>
<th>General Requirements</th>
<th>Legislation</th>
<th>Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Certain types of federal financial assistance may not be used in floodplains unless the community participates in National Flood Insurance Program and flood insurance is both obtained and maintained.</td>
<td>Flood Disaster Protection Act of 1973 as amended (42 USC 4001-4128)</td>
<td>24 CFR 50.4(b)(1) and 24 CFR 58.6(a) and (b); 24 CFR 55.1(b).</td>
</tr>
</tbody>
</table>

### Reference

https://www.onecpd.info/environmental-review/flood-insurance

**Note that if you change answers on this screen, make sure to press “Next” button in order for the information to save and proceed to the appropriate next question.**

1. Does this project involve mortgage insurance, refinance, acquisition, repairs, rehabilitation, or construction of a structure, mobile home, or insurable personal property? ☐
   - No. This project does not require flood insurance or is excepted ☐ from flood insurance.
   - Yes

[Next]

[Save and Return to Summary] [Cancel Review]
## 2005 – Related Federal Laws and Authorities Summary (50/58)

**Project Name:** Trailside-Apartments

Directions: Click on the Compliance Factor links in the first column in the chart below. The links will take you to a separate screen to answer questions and provide documentation on the specific Compliance Factor. After completing each Compliance Factor screen you will automatically return to this screen to continue.

<table>
<thead>
<tr>
<th>Compliance Factors</th>
<th>Are formal compliance steps or mitigation required?</th>
<th>Compliance Determinations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 &amp; 58.5</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Airport Hazards</strong> [Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D]</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td><strong>Coastal Barrier Resources</strong> [Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]]</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td><strong>Flood Insurance</strong> [Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]]</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td><strong>Air Quality</strong> [Clean Air Act, as amended, particularly section 176(c) &amp; (d), 40 CFR Parts 6, 51, 93]</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td><strong>Coastal Zone Management</strong> [Coastal Zone Management Act, sections 307(c) &amp; (d)]</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td><strong>Contamination and Toxic Substances - Multifamily and Nonresidential Properties</strong> [24 CFR 50.3(i) &amp; 58.5(i)(2)] (HUD Standard)</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td><strong>Endangered Species</strong> [Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402]</td>
<td>Yes</td>
<td>No</td>
</tr>
</tbody>
</table>
Air Quality

- The project does not include new construction or conversion
## 2010 - Air Quality (50/58)

<table>
<thead>
<tr>
<th>General Requirements</th>
<th>Legislation</th>
<th>Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Clean Air Act is administered by the U.S. Environmental Protection Agency (EPA), which sets national standards on ambient pollutants. In addition, the Clean Air Act is administered by States, which must develop State Implementation Plans (SIPs) to regulate their state air quality. Projects funded by HUD must demonstrate that they conform to the appropriate SIP.</td>
<td>Clean Air Act (42 USC 7401 et seq.) as amended particularly Section 176(c) and (d) (42 USC 7506(c) and (d))</td>
<td>40 CFR Parts 6, 51 and 53</td>
</tr>
</tbody>
</table>

### Reference

https://www.onecpd.info/environmental-review/air-quality

---

**Note that if you change answers on this screen, make sure to press “Next” button in order for the information to save and proceed to the appropriate next question.**

---

### Scope of Work

1. Does your project include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units?
   - [ ] Yes
   - [x] No

---

### Screen Summary

**Compliance Determination**

Describe the basis that led to your determination here, identifying all key elements from your support documentation that substantiate your determination. The following minimum language is based on your responses in this section. You are strongly encouraged to edit this language to provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

Based on the project description, this project includes no activities that would require further evaluation under the Clean Air Act. The project is in compliance with the Clean Air Act.
Coastal Zone Management

- The project is located in Pierce County, which is a Coastal Zone
- Activities will not increase impervious surfaces, increase sediment load in water bodies, or otherwise increase water runoff in a manner that triggers compliance with Washington State’s Coastal Zone management plan
<table>
<thead>
<tr>
<th>General Requirements</th>
<th>Legislation</th>
<th>Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Federal assistance to applicant agencies for activities affecting any coastal use or resource is granted only when such activities are consistent with federally approved State Coastal Zone Management Act Plans.</td>
<td>Coastal Zone Management Act (16 USC 1451-1464), particularly section 307(c) and (d) (16 USC 1456(c) and (d))</td>
<td>15 CFR Part 930</td>
</tr>
</tbody>
</table>

Reference

https://www.onecpd.info/environmental-review/coastal-zone-management

Note that if you change answers on this screen, make sure to press “Next” button in order for the information to save and proceed to the appropriate next question.

1. Is the project located in, or does it affect, a Coastal Zone as defined in your state Coastal Management Plan?  
   - Yes
   - No

2. Does this project include activities that are subject to state review?  
   - Yes
   - No
Contamination

- An ASTM Phase I Environmental Site Assessment did not reveal any recognized environmental conditions (RECs) or other issues that could affect the health or safety of residents
2076 - Contamination and Toxic Substances (Multifamily and Non-Residential Properties) (50/58)

<table>
<thead>
<tr>
<th>General Requirements</th>
<th>Legislation</th>
<th>Regulation</th>
</tr>
</thead>
</table>
| It is HUD policy that all properties that are being proposed for use in HUD programs be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of the occupants or conflict with the intended utilization of the property. | (none)      | 24 CFR 58.5(i)(2)
|                                                                                      |             | 24 CFR 50.3(i) |

Reference
https://www.onecpd.info/environmental-review/site-contamination

Note that if you change answers on this screen, make sure to press “Next” button in order for the information to save and proceed to the appropriate next question.

1. How was site contamination evaluated? Select all that apply.

Upload documentation and reports and explain evaluation of site contamination in the Screen Summary at the conclusion of this screen.

- [ ] ASTM Phase I ESA
- [ ] ASTM Phase II ESA
- [ ] Remediation or clean-up plan
- [ ] ASTM Vapor Encroachment Screening
- [ ] None of the above

2. Were any on-site or nearby toxic, hazardous, or radioactive substances found that could affect the health and safety of project occupants or conflict with the intended use of the property? (Were any recognized environmental conditions or RECs identified in a Phase I ESA and confirmed in a Phase II ESA?)

- [ ] No
- [ ] Yes

* Explain:
There were no RECs or concerns in the Phase I

- [ ] Yes

- [ ] No
Endangered Species

1. The project includes open space work that includes repaving the parking lot, updating a play structure and constructing a picnic area
   • Construction of the picnic area could require the removal of trees

2. There are several listed species in the project area

Consultation with FWS is required

• After consultation, FWS requires:
  (1) surveys for 3 flowering plants prior to any work: golden paintbrush, marsh sandwort, and water howellia,
  (2) a buffer area around the picnic area, and
  (3) work in the picnic area will be limited to brush removal, during non-breeding seasons for the Oregon spotted frog
sandwort, and water howellia.  
(2) A buffer area will be designated around the picnic area, and  
(3) Work in the picnic area will be limited to brush removal, during non-breeding seasons for the  
Oregon spotted frog.

No Mitigation Necessary.

Screen Summary

Compliance Determination

Describe the basis that led to your determination here, identifying all key elements from your support documentation that substantiate your determination. The following minimum language is based on your responses in this section. You are strongly encouraged to edit this language to provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

This project May Affect, but is Not Likely to Adversely Affect, listed species, and informal consultation was conducted. With mitigation, identified in the mitigation section of this review, the project will be in compliance with the Endangered Species Act.

After informal consultation with the USFWS, mitigation measures were designed to avoid any impacts to listed species. (1) Surveys for 3 flowering plants will be completed prior to any work: golden paintbrush, marsh sandwort, and water howellia. (2) A buffer area will be designated around the picnic area, and (3) Work in the picnic area will be limited to brush removal, during non-breeding seasons for the Oregon spotted frog. USFWS concurred with the City’s finding of May Affect, Not Likely to Adversely Affect listed species on July 1, 2019.

Supporting documentation

Upload all supporting documents required in this section here:  

- FWS Concurrence.doc
- Species List.pdf
- Buffer Map.png

Are formal compliance steps or mitigation required?  
Only Responsible Entity (for Part 58) or HUD (for Part 50) Users may respond to this question. Ensure that this question is complete before finalizing the review.

- Yes
- No

Save and Return to Summary
Explosive & Flammable Hazards

- There are several above ground storage tanks within 1 mile of the project site.
- The project site is 1,622 feet away from the nearest aboveground tank.
- The acceptable separation distance (ASD) for the closest tank is 207 feet.

### Acceptable Separation Distance Assessment Tool

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Is the container above ground?</td>
<td>Yes</td>
</tr>
<tr>
<td>Is the container under pressure?</td>
<td>No</td>
</tr>
<tr>
<td>Does the container hold a cryogenic liquified gas?</td>
<td>Yes</td>
</tr>
<tr>
<td>Is the container diked?</td>
<td>No</td>
</tr>
<tr>
<td>What is the volume (gal) of the container?</td>
<td>500</td>
</tr>
<tr>
<td>What is the Diked Area Length (ft)?</td>
<td></td>
</tr>
<tr>
<td>What is the Diked Area Width (ft)?</td>
<td></td>
</tr>
</tbody>
</table>

- Calculate Acceptable Separation Distance

- ASD for Blast Over Pressure (ASDBOP): 174.17
- ASD for Thermal Radiation for People (ASDPPU): 207.20
Screen Summary

Compliance Determination

Describe the basis that led to your determination here, identifying all key elements from your support documentation that substantiate your determination. The following minimum language is based on your responses in this section. You are strongly encouraged to edit this language to provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

There are several stationary aboveground storage container of concern within 1 mile of the project site. The Separation Distance from the project is acceptable. The project is in compliance with explosive and flammable hazard requirements.

The closest tank is 1,622 feet away from the site with an acceptable separation distance of 207 feet. Therefore, the distance is acceptable.

Supporting documentation

Upload all supporting documents required in this section here: Upload File

1 mile radius for ASD.png
ASD to site.png
ASD Calculation.png

Are formal compliance steps or mitigation required?
Only Responsible Entity (for Part 58) or HUD (for Part 50) Users may respond to this question. Ensure that this question is complete before finalizing the review.

- Yes
- No
• The project does not involve new construction, acquisition of undeveloped land, or other activities that could convert farmland to a non-agricultural use.
Compliance Determination

Describe the basis that led to your determination here, identifying all key elements from your support documentation that substantiate your determination. The following minimum language is based on your responses in this section. You are strongly encouraged to edit this language to provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

This project is limited to rehabilitation of existing housing and does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is in compliance with the Farmland Protection Policy Act.

Supporting documentation

Upload all supporting documents required in this section here:  

Are formal compliance steps or mitigation required?
Only Responsible Entity (for Part 58) or HUD (for Part 50) Users may respond to this question. Ensure that this question is complete before finalizing the review.

- Yes
- No
• The picnic and play area are in the 100-year floodplain
• The RE performed an 8-Step and identified several mitigation measures:
  • Use of permeable surfaces and natural landscaping
  • Planting native plant species
  • Stormwater capture and reuse
8-STEP PROCESS

Trailside Apartment Rehabilitation – Lakewood, WA
Decision Process for E.O. 11988 as Provided by 24 CFR §55.20

Step 1: Determine whether the action is located in a 100-year floodplain (or a 500-year floodplain for critical actions) or wetland.

This action is located in a 100-year floodplain. The parking lot, play and picnic areas on the proposed project site is located within A Zone (area of special flood hazard with water surface elevations determined), as indicated on Flood Insurance Rate Map (FIRM) Panel 313 of 1375 no. 5301380313C, revised August 19, 1987. The FIRM is attached to this document.

This project is (a) acquisition of property, (b) demolition, and (c) new construction of affordable multifamily housing of greater than four units and, for these reasons, E.O. 11988- Floodplain project does not meet any of the analysis of the direct and indirect impacts of the floodplain and wetland.

Early Notice and Public Review of a Proposed Activity in a 100-Year Floodplain

To: All interested Agencies, Groups and Individuals

This is to give notice that City of Lakewood under Part 58 has determined that the following proposed action under HOME and CDBG and HUD grant numbers B-09-MY-8564 and B-10-CD-5656 is located in the 100-year floodplain, and the City of Lakewood is determining the action in the floodplain area as required by Executive Order 11988. Procedures for Making Determinations of whether the project includes the rehabilitation of the Trailside complex, which has 250 units, of the rehabilitation of the Trailside complex, which has 250 units.

Final Notice and Public Explanation of a Proposed Activity in a 100-Year Floodplain

To: All interested Agencies, Groups and Individuals

This is to give notice that City of Lakewood under Part 58 has determined that the following proposed action under HOME and CDBG and HUD grant numbers B-09-MY-8564 and B-10-CD-5656 is located in the 100-year floodplain, and the City of Lakewood will be identifying and evaluating practicable alternatives to locating the action in the floodplain and the potential impacts on the floodplain from the proposed action as required by Executive Order 11988, in accordance with HUD regulations at 24 CFR 55.20 Subpart C.
Compliance Determination

Describe the basis that led to your determination here, identifying all key elements from your support documentation that substantiate your determination. The following minimum language is based on your responses in this section. You are strongly encouraged to edit this language to provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

The picnic and play areas are located in a 100-year floodplain. The 8-Step Process was completed, with the early public notice published on May 1, 2019, and the final notice published on June 1, 2019. With the 8-Step Process the project is be in compliance with Executive Order 11988. Mitigation, including use of permeable surfaces, natural landscaping, and stormwater capture, will be completed to enhance the floodplain function values of the portion of the site in the 100-year floodplain.

Supporting documentation

Upload all supporting documents required in this section here:  

- Floodplain-Management-8-Step.doc
- Public Notices 8-Step.pdf
- Mitigation Plan - Floodplains.pdf

Are formal compliance steps or mitigation required?  
Only Responsible Entity (for Part 58) or HUD (for Part 50) Users may respond to this question. Ensure that this question is complete before finalizing the review.

- Yes  
- No
Historic Preservation

• The structures themselves are less than 40 years old and not architecturally significant

• Project includes open space work that includes repaving the parking lot, updating a play structure, and constructing a picnic area
  • The SHPO has a known interest in the area because of the Oregon Trail
  • There are 7 Tribes with an interest in Pierce County, Washington
Which Response is Correct?

<table>
<thead>
<tr>
<th>General Requirements</th>
<th>Legislation</th>
<th>Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Regulations under Section 106 of the National Historic Preservation Act (NHPA)</td>
<td>Section 106 of the National Historic Preservation Act (16 U.S.C. 470f)</td>
<td>36 CFR 800 “Protection of Historic Properties”</td>
</tr>
<tr>
<td>require a consultative process to identify historic properties, assess</td>
<td></td>
<td><a href="http://www.access.gpo.gov/nara/cfr/waisidx_10/36cfr800_10.html">http://www.access.gpo.gov/nara/cfr/waisidx_10/36cfr800_10.html</a></td>
</tr>
<tr>
<td>project impacts on them, and avoid, minimize, or mitigate adverse effects</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Reference

https://www.onecpd.info/environmental-review/historic-preservation

Note that if you change answers on this screen, make sure to press “Next” button in order for the information to save and proceed to the appropriate next question.

Is Section 106 review required for your project?

- No, because the project consists solely of activities listed as exempt in a Programmatic Agreement (PA). (See the PA Database to find applicable PAs.)
- No, because the project consists solely of activities included in a No Potential to Cause Effects memo or other determination [36 CFR 800.3(a) (1)].
- Yes, because the project includes activities with potential to cause effects (direct or indirect).
Compliance Determination

Describe the basis that led to your determination here, identifying all key elements from your support documentation that substantiate your determination. The following minimum language is based on your responses in this section. You are strongly encouraged to edit this language to provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

Based on Section 106 consultation the project will have No Adverse Effect on historic properties. Conditions: Avoidance of the area directly around the creek. If any resources are found, the SHPO and tribes will be contacted immediately. Upon satisfactory implementation of the conditions, which will be monitored, the project is in compliance with Section 106.

Supporting documentation

Upload all supporting documents required in this section here: Upload File

Letter to SHPO.doc  X
Letters to Tribes.docx  X
SHPO Concurrence (2).PNG  X
Tribal Responses.PNG  X

Are formal compliance steps or mitigation required?
Only Responsible Entity (for Part 58) or HUD (for Part 50) Users may respond to this question. Ensure that this question is complete before finalizing the review.

- [ ] Yes
- [ ] No
Historic Preservation Screen

Example #1

Screen Summary

Compliance Determination

Describe the basis that led to your determination here, identifying all key elements from your support documentation that substantiate your determination. The following minimum language is based on your responses in this section. You are strongly encouraged to edit this language to provide a clear description of your determination and a synopsis of the information that it was based on, such as:

• Map panel numbers and dates
• Names of all consulted parties and relevant consultation dates
• Names of plans or reports and relevant page numbers
• Any additional requirements specific to your region

Based on the project description the project has No Potential to Cause Effects. The project is in compliance with Section 106.

Supporting documentation

Upload all supporting documents required in this section here: [Upload File]

Are formal compliance steps or mitigation required?
Only Responsible Entity (for Part 58) or HUD (for Part 50) Users may respond to this question. Ensure that this question is complete before finalizing the review.

[ ] Yes
[ ] No

Save and Return to Summary

Cancel Review

This HEROS version was deployed on Tue Dec 4, 2018 at 11:00
Historic Preservation Screen

Example #2

Screen Summary

Compliance Determination

Describe the basis that led to your determination here, identifying all key elements from your support documentation that substantiate your determination. The following minimum language is based on your responses in this section. You are strongly encouraged to edit this language to provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

Based on the project description the project is covered by a Programmatic Agreement that includes an applicable exemption that exempts this project from the requirements of Section 106. The project is in compliance with Section 106.

Supporting documentation

Upload all supporting documents required in this section here:  

- HUD Part 50 Programmatic Agreement: Executed.pdf
- proof of building age.docx

Are formal compliance steps or mitigation required?

Only Responsible Entity (for Part 58) or HUD (for Part 50) Users may respond to this question. Ensure that this question is complete before finalizing the review.

- Yes
- No

Save and Return to Summary
STIPULATIONS

HUD will ensure that the following measures are carried out.

I. ACTIVITIES THAT DO NOT REQUIRE REVIEW

The following types of activities have little or no potential to affect historic properties and are exempt from further review under Section 106. To document and conclude the review, HUD shall note in the administrative record the applicability of one or more of the exemptions.

A. Activities that are Exempt and/or Categorically Excluded and not subject to related laws under 24 CFR 50.19(b)

B. Refinancing without demolition or rehabilitation of existing buildings, or new construction, and no physical activities beyond maintenance activities as defined in HUD Notice CPD-16-02 “Guidance for Categorizing an Activity as Maintenance for Compliance with HUD Environmental Regulations, 24 CFR Parts 50 and 58”

C. Leasing without demolition or rehabilitation of existing buildings, or new construction, and no physical activities beyond maintenance as defined in HUD Notice CPD-16-02 “Guidance for Categorizing an Activity as Maintenance for Compliance with HUD Environmental Regulations, 24 CFR Parts 50 and 58”

D. Projects including refinancing and rehabilitation of existing buildings less than 45 years old, with no ground disturbance, unless the property is located within or adjacent to or adjoining a National Register of Historic Places listed or eligible historic district

E. Undertakings that are limited to the rehabilitation of interior spaces within single family residential structures as defined by HUD regulation as 1 to 4 unit residential
Step 2 - Identify and Evaluate Historic Properties

Screen Summary

Compliance Determination

Describe the basis that led to your determination here, identifying all key elements from your support documentation that substantiate your determination. The following minimum language is based on your responses in this section. You are strongly encouraged to edit this language to provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

Based on Section 106 consultation there are No Historic Properties Affected because there are no historic properties present. The project is in compliance with Section 106.

Supporting documentation

Upload all supporting documents required in this section here:

- letter to SHPO.docx
- letter to Delaware tribe.docx
- SHPO concurrence.docx

Are formal compliance steps or mitigation required?
Only Responsible Entity (for Part 58) or HUD (for Part 50) Users may respond to this question. Ensure that this question is complete before finalizing the review.

- Yes
- No
Replacing windows and doors with more weather-resistant options will naturally attenuate noise.
Noise

Improved building envelope components (better windows and doors, strengthened sheathing, insulation, sealed gaps, etc.)

Redesigned building envelope (more durable or substantial materials, increased air gap, resilient channels, staggered wall studs, etc.)

Other

Explain:

No

Screen Summary

Compliance Determination

Describe the basis that led to your determination here, identifying all key elements from your support documentation that substantiate your determination. The following minimum language is based on your responses in this section. You are strongly encouraged to edit this language to provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

The project is modernization or minor rehabilitation of an existing residential property. The project will include standardized noise attenuation measures, including replacing windows and doors with more noise-resistant replacements. The project is in compliance with HUD's Noise regulation.

Supporting documentation

Upload all supporting documents required in this section here: Upload File

Are formal compliance steps or mitigation required?

Only Responsible Entity (for Part 58) or HUD (for Part 50) Users may respond to this question. Ensure that this question is complete before finalizing the review.

- Yes
- No
Completing the Noise Screen

- The questions and prompts change depending on the activities and level of review
  - Minor (CEST-level) rehab does not require a noise calculation
  - Major (EA-level) rehab does require a noise calculation
- HUD encourages noise attenuation features for all rehabilitation projects
- For rehabilitation projects in Unacceptable noise zones, HUD strongly encourages conversion to land uses compatible with the high noise levels (Section 51.105)
6. HUD strongly encourages mitigation be used to eliminate adverse noise impacts. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation. This information will be automatically included in the Mitigation summary for the environmental review.

Mitigation as follows will be implemented:

* Double glazed windows will be installed to improve noise attenuation and weather resistance. During rehabilitation, all windows and exterior doors will be re-sealed for the same purposes.

Upload drawings, specifications, and other materials as needed to describe the project's noise mitigation measures in the Screen Summary at the conclusion of this screen.

No mitigation is necessary.
Noise Screen: EA-Level Rehab

5. Complete the Noise Assessment Guidelines to quantify the noise exposure. Indicate the findings of the Noise Assessment below:

- Acceptable: (65 decibels or less; the ceiling may be shifted to 70 decibels in circumstances described in §24 CFR 51.105(a))

- Normally Unacceptable: (Above 65 decibels but not exceeding 75 decibels; the floor may be shifted to 70 decibels in circumstances described in 24 CFR 51.105(a)*)
  Indicate noise level here (in dB): 71
  Upload noise analysis, including noise level and data used to complete the analysis, in the Screen Summary at the conclusion of this screen.

- Unacceptable: (Above 75 decibels)

6. HUD strongly encourages mitigation be used to eliminate adverse noise impacts. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation. This information will be automatically included in the Mitigation summary for the environmental review.

- Mitigation as follows will be implemented:

- No mitigation is necessary.
Noise Screen: New Construction

- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

A Noise Assessment was conducted. The noise level was normally unacceptable: 68.0 dB. See noise analysis. The project is in compliance with HUD's Noise regulation with mitigation.

Supporting documentation
Upload all supporting documents required in this section here: 

DNL calculations.docx
noise map.docx
noise mitigation plans.docx

Are formal compliance steps or mitigation required?
Only Responsible Entity (for Part 58) or HUD (for Part 50) Users may respond to this question. Ensure that this question is complete before finalizing the review.

- Yes
- No
The project is located on the Pierce County Sole Source Aquifer.

However, the project is limited to rehab of an existing building, so it is unlikely to impact a Sole Source Aquifer.
Sole Source Aquifers

2055 - Sole Source Aquifers (50/58)  
Project Name: Trailside-Apartments

<table>
<thead>
<tr>
<th>General Requirements</th>
<th>Legislation</th>
<th>Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Safe Drinking Water Act of 1974 protects drinking water systems which are the sole or principal drinking water source for an area and which, if contaminated, would create a significant hazard to public health.</td>
<td>Safe Drinking Water Act of 1974 (42 U.S.C. 201, 300f et seq., and 21 U.S.C. 345)</td>
<td>40 CFR Part 149</td>
</tr>
</tbody>
</table>

Reference
https://www.onecpd.info/environmental-review/sole-source-aquifers

Note that if you change answers on this screen, make sure to press "Next" button in order for the information to save and proceed to the appropriate next question.

1. Does the project consist solely of acquisition, refinancing, insurance, leasing, repairs or rehabilitation of an existing building or building(s)?
   - Yes
   - No

Screen Summary

Compliance Determination

Describe the basis that led to your determination here, identifying all key elements from your support documentation that substantiate your determination. The following minimum language is based on your responses in this section. You are strongly encouraged to edit this language to provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

Based on the project description, the project consists of activities that are unlikely to have an adverse impact on groundwater resources. The project is in compliance with Sole Source Aquifer requirements.

Supporting documentation

Upload all supporting documents required in this section here: Upload File

Are formal compliance steps or mitigation required?

Only Responsible Entity (for Part 58) or HUD (for Part 50) Users may respond to this question. Ensure that this question is complete before finalizing the review.

- Yes
- No
There is a wetland on site, but no new work will be performed in that portion of the site.
Wetlands under E.O. 11990 include isolated and non-jurisdictional wetlands.

- No, a wetland will not be impacted in terms of E.O. 11990’s definition of new construction.
  - Upload a map or any other relevant documentation in the Screen Summary at the conclusion of this screen to explain your determination.

- Yes, there is a wetland that will or may be impacted in terms of E.O. 11990’s definition of new construction.

**Screen Summary**

**Compliance Determination**

Describe the basis that led to your determination here, identifying all key elements from your support documentation that substantiate your determination. The following minimum language is based on your responses in this section. You are strongly encouraged to edit this language to provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

**The project will not impact on- or off-site wetlands. The project is in compliance with Executive Order 11990.**

**Supporting documentation**

Upload all supporting documents required in this section here:  

**Wetlands map.png**

**Are formal compliance steps or mitigation required?**

Only Responsible Entity (for Part 58) or HUD (for Part 50) Users may respond to this question. Ensure that this question is complete before finalizing the review.

- Yes
- No
• The project is not in proximity to any Wild and Scenic Rivers

Wild and Scenic Rivers
Screen Summary

Compliance Determination

Describe the basis that led to your determination here, identifying all key elements from your support documentation that substantiate your determination. The following minimum language is based on your responses in this section. You are strongly encouraged to edit this language to provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act.

Supporting documentation

Upload all supporting documents required in this section here: Upload File

WSR map.png

Are formal compliance steps or mitigation required?
Only Responsible Entity (for Part 58) or HUD (for Part 50) Users may respond to this question. Ensure that this question is complete before finalizing the review.

- Yes
- No
• No unmitigated environmental conditions were identified
### General Requirements

<table>
<thead>
<tr>
<th>Determine if the project creates adverse environmental impacts upon a low-income or minority community. If it does, engage the community in meaningful participation about mitigating the impacts or move the project</th>
</tr>
</thead>
<tbody>
<tr>
<td>Legislation</td>
</tr>
<tr>
<td>Executive Order 12898</td>
</tr>
</tbody>
</table>

### Reference

https://www.onecpd.info/environmental-review/environmental-justice

Note that if you change answers on this screen, make sure to press “Next” button in order for the information to save and proceed to the appropriate next question.

HUD strongly encourages starting the Environmental Justice analysis only after all other laws and authorities, including Environmental Assessment factors if necessary, have been completed.

1. Were any adverse environmental impacts identified in any other compliance review portion of this project’s total environmental review?
   - Yes
   - No

### Screen Summary

**Compliance Determination**

Describe the basis that led to your determination here, identifying all key elements from your support documentation that substantiate your determination. The following minimum language is based on your responses in this section. You are strongly encouraged to edit this language to provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

No adverse environmental impacts were identified in the project’s total environmental review that will not be mitigated to avoid impacts to residents and the community. The project is in compliance with Executive Order 12898.

**Supporting documentation**

Upload all supporting documents required in this section here: [Upload File]

**Are formal compliance steps or mitigation required?**

Only Responsible Entity (for Part 56) or HUD (for Part 50) Users may respond to this question. Ensure that this question is complete before finalizing the review.
<table>
<thead>
<tr>
<th>Topic</th>
<th>Question</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Floodplain Management</strong></td>
<td></td>
<td>The 8-Step Process project was in compliance with Executive Order 11988. Mitigation, including use of permeable surfaces, natural landscaping, and stormwater capture, was completed, with the early public notice published on May 1, 2019, and the final notice published on June 1, 2019. With the 8-Step Process the project is in compliance with Executive Order 11988. Mitigation, including use of permeable surfaces, natural landscaping, and stormwater capture, will be completed to enhance the floodplain function values of the portion of the site in the 100-year floodplain.</td>
</tr>
<tr>
<td><strong>Historic Preservation</strong></td>
<td></td>
<td>Based on Section 106 consultation the project will have No Adverse Effect on historic properties. Conditions: Avoidance. Upon satisfactory implementation of the conditions, which should be monitored, the project is in compliance with Section 106.</td>
</tr>
<tr>
<td><strong>Noise Abatement and Control</strong></td>
<td></td>
<td>The project is modernization or minor rehabilitation of an existing residential property. The project will include standardized noise attenuation measures, including replacing windows and doors with more noise-resistant replacements. The project is in compliance with HUD's Noise regulation.</td>
</tr>
<tr>
<td><strong>Sole Source Aquifers</strong></td>
<td></td>
<td>Based on the project description, the project consists of activities that are unlikely to have an adverse impact on groundwater resources. The project is in compliance with Sole Source Aquifer requirements.</td>
</tr>
<tr>
<td><strong>Wetlands Protection</strong></td>
<td></td>
<td>The project will not impact on- or off-site wetlands. The project is in compliance with Executive Order 11990.</td>
</tr>
<tr>
<td><strong>Wild and Scenic Rivers</strong></td>
<td></td>
<td>This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act.</td>
</tr>
<tr>
<td><strong>Environmental Justice</strong></td>
<td></td>
<td>No adverse environmental impacts were identified in the project’s total environmental review that will not be mitigated to avoid impacts to residents and the community. The project is in compliance with Executive Order 12898.</td>
</tr>
</tbody>
</table>

---

**Next Steps**
Before proceeding with this screen, review to ensure that you have completed all preceding screens. The mitigation measures and conditions below are generated from information provided in the Law and Authority and EA Factor screens, so it is important that all previous screens be finalized before continuing.

Review the mitigation measures and conditions required of this project below.

### Law, Authority, or Factor

<table>
<thead>
<tr>
<th>Endangered Species</th>
</tr>
</thead>
<tbody>
<tr>
<td>(1) Surveys for 3 flowering plants will be completed prior to any work: golden paintbrush, marsh sandwort, and water howellia. (2) A buffer area will be designated around the picnic area, and (3) Work in the picnic area will be limited to brush removal, during non-breeding seasons for the Oregon spotted frog</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Floodplain Management</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mitigation will include use of permeable surfaces, natural landscaping, and stormwater capture to enhance the floodplain function on the site. The floodplain is limited to the picnic and play area, so it is not necessary to mitigate the structures. See attached documents for details on how stormwater capture and other mitigation will be incorporated into the project site.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Historic Preservation</th>
</tr>
</thead>
<tbody>
<tr>
<td>No work will be done in the area directly around the creek. If any resources are found, the SHPO and tribes will be contacted immediately.</td>
</tr>
</tbody>
</table>

To insert additional mitigation measures or conditions not listed here, click the “Add Mitigation Measure or Condition” button above. If no mitigation measures are required, you may continue to the next page. Otherwise, describe the Mitigation Plan below.

**Mitigation Plan**

Explain how the above mitigation measures and conditions will be carried out and monitored. Clearly identify both the persons responsible for implementing and monitoring mitigation measures and the timeframe in which they will be completed. These measures and conditions must be incorporated into project contracts, development agreements and other relevant documents. (40 CFR 1505.2(c))

Designate who will (1) conduct and (2) confirm completion of each the mitigation measures above. In addition, state at what stage in the project development each of these steps will be completed and confirmed.

Attach the mitigation plan here: Upload(Optional)
Your responses within the tailored questions on each law and authority determine whether mitigation measures appear on the Mitigation Measures and Conditions screen. This is not tied to your responses to the question on each screen, “Are formal compliance steps or mitigation required?”
## Good Mitigation Measures

<table>
<thead>
<tr>
<th>Acceptable Mitigation Measure</th>
<th>Unacceptable</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Endangered Species:</strong> No trees may be removed between April 15-September 15 to avoid impacts to bats’ summer habitats. Developer must complete any and all tree removal prior to April 1, while bats are still in hibernation. HUD Construction Analysts will review site construction plan prior to initial endorsement to ensure this condition. HUD construction analysis will confirm condition was met prior to final endorsement.</td>
<td>Construction will avoid impacts to bat habitat.</td>
</tr>
<tr>
<td><strong>Floodplain Management:</strong> All new construction will be elevated one foot above base flood elevation to protect residents. Sidewalks will be composed of pervious surfaces to facilitate drainage. HUD construction analysts will confirm construction plans prior to initial endorsement.</td>
<td>Applicant expects to receive a CLOMA from FEMA removing the site from the floodplain.</td>
</tr>
<tr>
<td><strong>Energy Consumption/Energy Efficiency:</strong> Building will include Energy Star appliances, heating, and cooling. Utilities will be individually metered and programmable, and there will be an energy efficiency education program for tenants.</td>
<td>N/A</td>
</tr>
</tbody>
</table>
What’s the Difference Between a Mitigation Plan and a Mitigation Measure?

- Mitigation measure: Action that will be taken to reduce environmental risks or impacts
  - Example: A 6-foot tall fence will be constructed at the property line along the rail lines

- Mitigation plan: Plan indicating who will complete and monitor mitigation measures and timeframe for when measures will be carried out
  - Example: Grantee will construct the fence. Prior to initial project approval, the RE Construction Analyst will review and approve final construction plans. Construction Analyst will verify proper completion of the fence prior to final project approval.
Making a Determination

Environmental Finding

Document your determination by selecting one of the options below:

- This project converts to Exempt, per §58.34(a)(12) because there are no circumstances which require compliance with any of the federal laws and authorities cited at §58.5
- This project cannot convert to Exempt because there are circumstances which require compliance with one or more federal laws and authorities cited at §58.5. Complete compliance requirements, publish NOI/RROF and obtain Authority to Use Grant Funds before drawing down funds.
- Extraordinary circumstances exist and this project may result in significant environmental impact. This project requires preparation of an Environmental Assessment (EA).

Go Back  Save and Continue
Previewing the ERR

6220 – Package Screen (50/58)  Project Name: Trailside-Apartments

Generate and review the preview of the environmental review record, taking special care to ensure that all questions have complete and accurate responses and all supporting documentation. It is your responsibility to ensure that your review is complete. If necessary, use the menu on the left side of this screen to navigate through and edit the previous screens.

Generate preview of environmental review record  Save and Continue
Environmental Review for Activity/Project that is Categorically Excluded Subject to Section 58.5 Pursuant to 24 CFR 58.35(a)

Project Information

Project Name: Trailside Apartments
HEROS Number: 90000010031583

Responsible Entity (RE): LAKewood, 6000 Main St SW Lakewood WA, 98499

State / Local Identifier:

RE Preparer: Liz Zepeda
Certifying Officer: Marcel Tchaou

Grant Recipient (if different than Responsible Entity):

Point of Contact:

Consultant (if applicable):

Point of Contact:

Project Location: 12559 47th Ave SW, Lakewood, WA 98499

Additional Location Information:
N/A

Direct Comments to:

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]: The purpose of this project is to rehabilitate two 2-story multifamily buildings and one single-story multifamily building in a single complex. The work will include updating doors and windows, as well as common areas in the complex. Inside the apartments, the kitchens and bathrooms will be updated, along with the exterior and interior of the complex.
Signature and Posting

6226 – CEST Signature and Posting for Public Comment Screen (58)  
Project Name: Trailside-Apartments

**Step One:** Print the signature page. After the necessary signatures are obtained, scan and upload the document.

- Print Signature Page
- Upload signed signature page: Upload

Indicate the date the Environmental Review Record was signed:

**Step Two:** Indicate the closing date of the public comment period:

**Step Three:** Provide the address (email and/or street address) where the public should direct their comments during the public comment period:

**Step Four:** Generate your complete Environmental Review Record for posting on the HUD website for public comment. Pressing this button will cause your Environmental Review Record to be posted at [https://www.onecpd.info/environmental-review/environmental-review-records](https://www.onecpd.info/environmental-review/environmental-review-records) within 24 hours for the duration of the public comment period. You may wish to provide a link to this website when publishing or posting your NOI-RROF.

- Generate & Post Environmental Review Record
- Go Back
- Save and Exit
- Save and Continue
This project is not categorically excluded OR, if originally categorically excluded, is now subject to a full Environmental Assessment according to Part 58 Subpart E due to extraordinary circumstances (Section 58.35(c)).

Preparer Signature: ___________________________ Date: _______________

Name / Title / Organization: Liz Zebeda / LAKEWOOD

Responsible Entity Agency Official Signature: ___________________________ Date: __________

Name / Title: ______________________________________________________

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environment Review Record (ERR) for the activity / project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).
Signature and Posting

6226 – CEST Signature and Posting for Public Comment Screen (58)  
Project Name: Trailside-Apartments

Step One: Print the signature page. After the necessary signatures are obtained, scan and upload the document.

Print Signature Page  
Upload signed signature page:  
Signature Page for Trailside Rehab.pdf

Indicate the date the Environmental Review Record was signed: 7/1/19

Step Two: Indicate the closing date of the public comment period: 7/16/19

Step Three: Provide the address (email and/or street address) where the public should direct their comments during the public comment period:

publiccomments@responsibleentity.gov
123 Responsible Entity Street, Room 456

Step Four: Generate your complete Environmental Review Record for posting on the HUD website for public comment. Pressing this button will cause your Environmental Review Record to be posted at https://www.onecpd.info/environmental-review/environmental-review-records within 24 hours for the duration of the public comment period. You may wish to provide a link to this website when publishing or posting your NOI-RROF.

Generate & Post Environmental Review Record

Go Back  
Save and Exit  
Save and Continue


- Reviews will be posted during public comment periods.
- Completed reviews will be archived on HUD Exchange for a year for standard reviews and 5 years for tiered reviews.

**Environmental Review Records**

HUD's Environmental Review Records page houses environmental reviews made publicly available through the HUD Environmental Review Online System (HEROS). This includes environmental assessments, CEST reviews, and CEST reviews that converted to exempt.

Use the search filters below to find projects with recent environmental reviews. Reviews currently in public comment period will appear above archived reviews. Tiered reviews will be available for five years. For reviews in public comment period, send your comments to the person identified in the Environmental Review Record. If you have submitted an environmental review through HEROS for posting but do not see it on this website within 24 hours, submit an inquiry through Ask a Question. New or updated environmental reviews are posted here between 8 AM and 10 PM ET Monday through Saturday.

**Related Resources**
- Environmental Review Main
- Environmental Impact Statements

---

**Environmental Review Records**

The most recent reports are listed below. Browse reports by selecting the next page or use the filters on the left to find specific reports.

**Filter By**

- **All Report Statuses**
- **All States**

- 2019 Multi Family Development Clark Commons II
  Flint, MI
  Public comment available until 10/15/2019

- 2019 Housing Rehabilitation Program
  100 N Martin Luther King Jr, IL
  Public comment available until 10/14/2019

- Valley Hemlock Bridge Rehab
  Coatesville, PA
  Public comment available until 10/11/2019

- Carlos Aguilar Field 2 Improvements
  El Centro, CA
  Public comment available until 10/15/2019

- Aspire Counseling Center Exterior Repairs FY19
  Orlando, FL
Wait 15 days...
Notice of Intent to Request Release of Funds (NOI-RROF)

Indicate means of providing public notice of NOI-RROF (may select more than one):
- [x] Published
- [ ] Posted
- [ ] Click here if you are combining RE and HUD public comment periods because (under Part 58.33) funds are needed on an emergency basis, and adherence to separate public comment periods would prevent the giving of assistance during a Presidentially-declared disaster or during a local emergency that has been declared by the chief elected official of the responsible entity who has proclaimed that there is an immediate need for public action to protect the public safety.

Did you receive any public comments?
- [ ] No
- [x] Yes

If you did receive public comments, upload both comments received and your responses, including a summary of any changes made, here:

Upload

If you decided to make changes to the environmental review in response to public comments, integrate those changes into the appropriate sections now. Use the side menu to navigate.
2 Options for 7015.15 - RROF

7015.15 - Request for Release of Funds and Certification

The following screen can be completed one of two ways. The first option is for form 7015.15 to be signed by the Certifying Officer outside of HEROS and uploaded on the screen. The second option is for form 7015.15 to be certified within HEROS by the Certifying Officer by completing this screen. Both options can be submitted to HUD using the assigned feature at the bottom of this screen. Form 7015.15 is not submitted to HUD until it is assigned to a staff member at the HUD local field office.

Upload the notice to the public in accordance with 24 CFR 58.70 here:

Upload

Trailside Public Notice.pdf

Indicate whether the Certifying Officer completed the 7015.15 on paper or whether they will be certifying the review in HEROS:

- The Certifying Officer completed a paper 7015.15
- The Certifying Officer will certify the review in HEROS

Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Submitting the 7015.15 to HUD

HUD’s objection period begins after HUD receives the RROF.

Note: HUD will assume the validity of the RROF and Certification and approve these documents after the expiration of the 15-day period unless it has knowledge that these documents are insufficient or inaccurate or it receives valid objections. (See 24 CFR § 58.72) If after approving a certification and RROF, HUD learns of a violation of 24 CFR § 58.22 or another applicable environmental authority, HUD shall
Option 1: Paper Form

7015.15 - Request for Release of Funds and Certification

The following screen can be completed one of two ways. The first option is for form 7015.15 to be signed by the Certifying Officer outside of HEROS and uploaded on the screen. The second option is for form 7015.15 to be certified within HEROS by the Certifying Officer by completing this screen. Both options can be submitted to HUD using the assigned feature at the bottom of this screen. Form 7015.15 is not submitted to HUD until it is assigned to a staff member at the HUD local field office.

* Upload the notice to the public in accordance with 24 CFR 58.70 here:
  
  ![Upload button](image)
  
  Trailside Public Notice.pdf

Indicate whether the Certifying Officer completed the 7015.15 on paper or whether they will be certifying the review in HEROS:

- The Certifying Officer completed a paper 7015.15
- The Certifying Officer will certify the review in HEROS

Upload the signed 7015.15 here:

![Upload button](image)

Trailside Signed RROF.pdf

* Enter date the uploaded 7015.15 was signed by the Certifying Officer: 7/17/19

If Part 3 was signed by the Authorizing Officer of the recipient, enter the date Part 3 was signed:
Option 2: Online Form

7015.15 - Request for Release of Funds and Certification

The following screen can be completed one of two ways. The first option is for form 7015.15 to be signed by the Certifying Officer outside of HEROS and uploaded on the screen. The second option is for form 7015.15 to be certified within HEROS by the Certifying Officer by completing this screen. Both options can be submitted to HUD using the assigned feature at the bottom of this screen. Form 7015.15 is not submitted to HUD until it is assigned to a staff member at the HUD local field office.

* Upload the notice to the public in accordance with 24 CFR 58.70 here:

[Upload]

Trailside Public Notice.pdf

Indicate whether the Certifying Officer completed the 7015.15 on paper or whether they will be certifying the review in HEROS:

- The Certifying Officer completed a paper 7015.15
- The Certifying Officer will certify the review in HEROS

This screen is to be used by Responsible Entities and Recipients (as defined in 24 CFR 58.2) when requesting the release of funds, and requesting the authority to use such funds, for HUD programs identified by statutes that provide for the assumption of the environmental review responsibility by units of general local government and States. Public reporting burden for this collection of information is estimated to average 36 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless that collection displays a valid OMB control number.

Part 1. Program Description and Request for Release of Funds (to be completed by Responsible Entity)

1. Program Title(s):

   Community Development Block Grants (CDBG) (Entitlement), HOME Program
Part 2. Environmental Certification (to be completed by Responsible Entity)

☐ With reference to the above Program Activity(ies)/Project(s), I, the undersigned officer of the responsible entity, certify that:

1. The responsible entity has fully carried out its responsibilities for environmental review, decision-making and action pertaining to the project(s) named above.

2. The responsible entity has assumed responsibility for and complied with and will continue to comply with, the National Environmental Policy Act of 1969, as amended, and the environmental procedures, permit requirements and statutory obligations of the laws cited in 24 CFR 58.5; and also agrees to comply with the authorities in 24 CFR 58.6 and applicable State and local laws.

3. The responsible entity has assumed responsibility for and complied with and will continue to comply with Section 106 of the National Historic Preservation Act, and its implementing regulations 36 CFR 800, including consultation with the State Historic Preservation Officer, Indian tribes and Native Hawaiian organizations, and the public.

4. After considering the type and degree of environmental effects identified by the environmental review completed for the proposed project described in Part 1 of this request, I have found that the proposal did □ did not require the preparation and dissemination of an environmental impact statement.

5. The responsible entity has disseminated and/or published in the manner prescribed by 24 CFR 58.43 and 58.55 a notice to the public in accordance with 24 CFR 58.70 and as evidenced by the attached copy (copies) or evidence of posting and mailing procedure.

6. The dates for all statutory and regulatory time periods for review, comment or other action are in compliance with procedures and requirements of 24 CFR Part 58.

7. In accordance with 24 CFR 58.71(b), the responsible entity will advise the recipient (if different from the responsible entity) of any special environmental conditions that must be adhered to in carrying out the project.

☐ As the duly designated certifying official of the responsible entity, I also certify that

8. I am authorized to and do consent to assume the status of Federal official under the National Environmental Policy Act of 1969 and each provision of law designated in the 24 CFR 58.5 list of NEPA-related authorities insofar as the provisions of these laws apply to the HUD responsibilities for environmental review, decision-making and action that have been assumed by the responsible entity.

9. I am authorized to and do accept, on behalf of the recipient personally, the jurisdiction of the Federal courts for the enforcement of all these responsibilities, in my capacity as certifying officer of the responsible entity Name of Certifying Officer of the Responsible Entity.

Name of Certifying Officer: __________________________

Title of Certifying Officer: __________________________

Date: __________________________

Address of Certifying Officer: __________________________
Address of Certifying Officer:

LAKEWOOD
6000 Main St SW
Lakewood
Washington
98499-5027

Part 3. To be completed when the Recipient is not the Responsible Entity
The recipient requests the release of funds for the programs and activities identified in Part 1 and agrees to abide by the special conditions, procedures and requirements of the environmental review and to advise the responsible entity of any proposed change in the scope of the project or any change in environmental conditions in accordance with 24 CFR 58.71(b).

Name of Authorized Officer: ____________________________

Title of Authorized Officer: ____________________________

Date: ____________________________

---

Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Submitting the 7015.15 to HUD

HUD’s objection period begins after HUD receives the RROF.

Note: HUD will assume the validity of the RROF and Certification and approve these documents after the expiration of the 15-day period unless it has knowledge that these documents are insufficient or inaccurate or it receives valid objections. (See 24 CFR § 58.72) If after approving a certification and RROF, HUD learns of a violation of 24 CFR § 58.22 or another applicable environmental authority, HUD shall impose appropriate remedies and sanctions at that time. HUD’s ability to review documents through HEROS creates no new obligations on HUD to verify the accuracy of the documents created using this system prior to approving the certification and RROF.

To submit form 7015.15 to HUD, select Assign Review in the side menu. Assign the review to the HUD contact as directed by your local HUD office. Be sure to check the box indicating that you are submitting form 7015.15. This checkbox is the official indicator that the 7015.15 was submitted to HUD.

You are strongly encouraged to follow up with your HUD contact by phone or email to confirm that your submission was received.
Assign Review

Project Name: Trailside-Apartments

After you assign this review to another user, you will no longer be able to edit it unless it is assigned back to you. Be sure you are done editing this review before assign it to another user.

First Name: Brian
Last Name:

Search  Reset  Cancel

<table>
<thead>
<tr>
<th>Last Name</th>
<th>First Name</th>
<th>Role</th>
<th>Organization</th>
<th>E-mail</th>
<th>City</th>
<th>State</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sturdivant*</td>
<td>Brian</td>
<td>HUD</td>
<td></td>
<td><a href="mailto:brian.sturdivant@hud.gov">brian.sturdivant@hud.gov</a></td>
<td>Seattle</td>
<td>WA</td>
</tr>
</tbody>
</table>

Other users who have previously been assigned to this review:

<table>
<thead>
<tr>
<th>Last Name</th>
<th>First Name</th>
<th>Role</th>
<th>Organization</th>
<th>E-mail</th>
<th>City</th>
<th>State</th>
</tr>
</thead>
<tbody>
<tr>
<td>Zepeda</td>
<td>Liz</td>
<td>Responsible Entity</td>
<td>Lakewood</td>
<td><a href="mailto:elizabeth.g.zepeda@hud.gov">elizabeth.g.zepeda@hud.gov</a></td>
<td>Washington</td>
<td>DC</td>
</tr>
</tbody>
</table>

- Check here if you are assigning this review to your local HUD contact as the official submission of the 7015.15
- Enter any comments you have for the next assigned user here:

  Submitting 7015.15 - RROF to HUD on July 17, 2019

Assign  Cancel
• Follow up outside the system to make sure the new assignee is available before assigning the review.
  • The only people who can change an assignment are the current Assigned User and users with Admin privileges (including Technical Branch Chiefs).

• Both the previous assigned user and the new assigned user will receive an email with the subject line Environmental review is assigned to you from HEROS-no-reply@hud.gov

• The environmental review will no longer appear in your dashboard after you assign it to another user
  • You will be able to see it again when the review is assigned back to you (typically when HUD submits form 7015.16 – AUGF)
HUD completes 7015.16 – AUGF in HEROS

RE cannot edit this screen
Archive and Complete

6600 – Complete and Archive Review (50/58)

Archive the Environmental Review Record. Pressing the Archive button will update and archive the complete Environmental Review Record on the HUD website at https://www.onecpd.info/environmental-review/environmental-review-records within 24 hours.

You may continue to update the Environmental Review Record after it has been archived. If this review is conditioned on completing mitigation, you are required to continue updating the review to document mitigation as it is completed. If this is a tiered review, site-specific reviews must be uploaded as they are completed. After each update, please return to this screen and press the Archive button to update the archived version of the environmental review record.

Congratulations! You have indicated that your environmental review is now complete.

Note: it is your responsibility to ensure that the review was completed properly. You can still make changes to update your review at any time.
Review will be marked complete on the Dashboard, but it can still be edited.
New Screens Appear in Side Menu
Mitigation Follow-Up

<table>
<thead>
<tr>
<th>Law, Authority, or Factor</th>
<th>Mitigation Measure</th>
<th>Upload Documentation</th>
<th>Comments</th>
<th>Cost Incurred</th>
<th>Complete</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Endangered Species</strong></td>
<td>(1) Surveys for 3 flowering plants will be completed prior to any work: golden paintbrush, marsh sandwort, and water haworthia, (2) A buffer area will be designated around the picnic area, and (3) Work in the picnic area will be limited to brush removal, during non-breeding seasons for the Oregon spotted frog</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Floodplain Management</strong></td>
<td>Mitigation will include use of permeable surfaces, natural landscaping, and stormwater capture to enhance the floodplain function on the site. The floodplain is limited to the picnic and play area, so it is not necessary to mitigate the structures. See attached documents for details on how stormwater capture and other mitigation will be incorporated into the project site.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Historic Preservation</strong></td>
<td>No work will be done in the area directly around the creek. If any resources are found, the SHPO and tribes will be contacted immediately.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

When you have finished updating this screen, update the archived version of the Environmental Review Record on the Complete and Archive Review screen.
Environmental Assessments in HEROS
Environmental Assessments (EAs)

1366 - Project Justification (50/58)  Project Name: Main-St-New-Construction

* Statement of Purpose and Need for the Proposal: The underlying purpose and need to which the agency is responding in proposing the action and its alternatives. Describe how the proposed action is intended to address housing and/or community development needs.

* Existing Conditions and Trends: [24 CFR 58.40(a)] Determine existing conditions and describe the character, features and resources of the project area and its surroundings; identify the trends that are likely to continue in the absence of the project.
Environmental Assessment Factors [24 CFR 58.40: Ref. 40 CFR 1508.8 1508.27]

For more information:
https://www.onecpd.info/environmental-review/environmental-assessments

Impact Codes: Choose from the following impact codes to document the impact for each factor. An impact code from the following list has been used to make the determination of impact for each factor.

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor adverse impact — may require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification and may require EIS

Directions:
The following chart is for the analysis of Environmental Assessment Factors.

- Information for the Environmental Assessment Factor can be found on the Office of Environment and Energy Website, which is listed above.
- The Impact Evaluation column is for impact analysis; for ALL Impact Codes record the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Provide the necessary reviews or consultations that have been completed and applicable permits of approvals have been obtained or noted. Provide citations, including dates/names/titles of contacts, as appropriate.
- Use the Mitigation column to explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation. This information will be automatically included in the Mitigation Summary for the environmental review.
- At the bottom of the screen upload verifiable source documentation as referenced and described in support of each determination, as appropriate.

<table>
<thead>
<tr>
<th>Environmental Assessment Factor</th>
<th>Impact Code</th>
<th>Impact Evaluation</th>
<th>Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td>LAND DEVELOPMENT</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Conformance with Plans /</td>
<td>Choose impact code ▼</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Compatible Land Use and Zoning /</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Scale and Urban Design</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Soil Suitability /</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Slope /</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Erosion /</td>
<td>Choose impact code ▼</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Drainage /</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Storm Water Runoff</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hazards and Nuisances including Site Safety and Site-Generated Noise</td>
<td>Choose impact code ▼</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Energy Consumption/Energy Efficiency</td>
<td>Choose impact code ▼</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
## Mitigation – EA Factors

### Project Name: Main-St-New-Construction

**Environmental Assessment Factors** [24 CFR 58.40; Ref. 40 CFR 1508.8 1508.27]

For more information: [https://www.onecpd.info/environmental-review/environmental-assessments](https://www.onecpd.info/environmental-review/environmental-assessments)

**Impact Codes:** Choose from the following impact codes to document the impact for each factor. An impact code from the following list has been used to mark the factor(s) below.

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor adverse impact – may require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification and may require EIS

**Directions:**

The following chart is for the analysis of Environmental Assessment Factors.

- Information for the Environmental Assessment Factor can be found on the Office of Environment and Energy Website, which is listed above.
- The Impact Evaluation column is for impact analysis. For all Impact Codes record the qualitative and quantitative significance of the effects of the project or its operation on the environment in the project area. Provide the necessary reviews or consultations if applicable. Permits have been obtained or all necessary requirements have been met as noted in the column, as appropriate.
- Use the Mitigation column to explain in detail the exact measures that must be implemented to mitigate for the impact or effect. Include the timeline for implementation. This information will be automatically included in the Mitigation Summary for the environmental review.
- At the bottom of the screen, upload verifiable source documentation as referenced and described in support of each determination, as appropriate.

### Table: Environmental Assessment Factors

<table>
<thead>
<tr>
<th>Environmental Assessment Factor</th>
<th>Impact Code</th>
<th>Impact Evaluation</th>
<th>Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Conformance with Plans /</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Compatible Land Use and Zoning /</td>
<td>Choose impact code</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Scale and Urban Design</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Soil Suitability /</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Slope /</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Erosion /</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Forestry  /</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Law, Authority, or Factor</td>
<td>Mitigation Measure or Condition</td>
<td></td>
<td></td>
</tr>
<tr>
<td>----------------------------------------------------------</td>
<td>---------------------------------</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design</td>
<td>None</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff</td>
<td>None</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hazards and Nuisances including Site Safety and Site-Generated Noise</td>
<td>None</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Energy Consumption/Energy Efficiency</td>
<td>None</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Employment and Income Patterns</td>
<td>None</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Demographic Character Changes / Displacement</td>
<td>None</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Educational and Cultural Facilities (Access and Capacity)</td>
<td>None</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Commercial Facilities (Access and Proximity)</td>
<td>None</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Health Care / Social Services (Access and Capacity)</td>
<td>None</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Solid Waste Disposal and Recycling (Feasibility and Capacity)</td>
<td>None</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Waste Water and Sanitary Sowers (Feasibility and Capacity)</td>
<td>None</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Water Supply (Feasibility and Capacity)</td>
<td>None</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Public Safety - Police, Fire and Emergency Medical</td>
<td>None</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Parks, Open Space and Recreation (Access and Capacity)</td>
<td>None</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Transportation and Accessibility (Access and Capacity)</td>
<td>None</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Cumulative Impact Analysis [24 CFR 58.32; 40 CFR 1508.7]:

Identify below the cumulative impact on the environment, that will result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over time.

Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]:

Identify below other reasonable courses of action that were considered and not selected, such as other sites, design modifications, or other uses of the subject site. Include the benefits and adverse impacts to the environment of each alternative, and the reasons (e.g., economic, engineering, or others) for rejecting it.

No Action Alternative [24 CFR 58.40(e); 40 CFR 1502.14]:

Identify below the "no action" alternative, describing the most likely conditions expected to exist in the future in the absence of the implementation of any action.
Environmental Finding

Document your finding by selecting one of the options below:

- Finding of No Significant Impact (FONSI)
- Finding of Significant Impact. An Environmental Impact Statement is required before funds can be committed or drawn down.

Go Back  Save and Continue
Working with Partners in HEROS
Part 58 Users in HEROS

Partners
- Assist REs with Part 58 reviews

Responsible Entities
- Perform Part 58 reviews

HUD
- Approves the Authority to Use Grant Funds (7015.16)
<table>
<thead>
<tr>
<th>Partner Users</th>
<th>Responsible Entity Users</th>
</tr>
</thead>
<tbody>
<tr>
<td>Assemble data and documents, input them directly into HEROS</td>
<td>Review and edit the information provided by the Partner through HEROS</td>
</tr>
<tr>
<td>HEROS screens are equivalent to the Partner Worksheets (can complete analysis only up to a point)</td>
<td>Follow up on any missing information, conduct consultation, complete all compliance determinations</td>
</tr>
<tr>
<td>Recipient Partners with certain privileges may edit Part 3 of the 7015.15-RROF</td>
<td>Solely responsible for finalizing environmental review record (making findings, providing public notice, completing Parts 1-2 of 7015.15-RROF)</td>
</tr>
</tbody>
</table>
Partner Users ➔ Non-RE Recipients

Partner User: Jane Doe

Partner Organization: Alexandria PHA

Responsible Entity/HUD: City of Alexandria
Multiple Partners may Collaborate
Partner User initiates review, enters project information and conducts initial analysis, uploads maps and documents.

Partner User submits review to RE.

RE User completes all compliance requirements, makes findings and determinations.

RE User submits the 7015.15 (RROF) to HUD.

HUD Approves the 7015.16 (Authority to Use Grant Funds) after the objection period.
Partners make recommendations that are confirmed by the RE

What level of review is required by the scope of the project?

For more information on determining the appropriate level of review, go to https://www.hudexchange.info/programs/environmental-review/orientation-to-environmental-reviews/#level-of-review

Only the Responsible Entity (RE) may determine the level of review. Your selection on this screen is only advisory. The RE may want to confirm the level of review before you proceed with the environmental review. Consult with the RE for questions about processing this review.

**Exempt**

Select appropriate citation(s) from 24 CFR 58.34(a): (Check all that apply)

- Environmental and other studies, resource identification and the development of plans and strategies. 24 CFR 58.34(a)(1)
- Information and financial services. 24 CFR 58.34(a)(2)
- Administrative and management activities. 24 CFR 58.34(a)(3)
- Public services that will not have a physical impact or result in any physical changes, including but not limited to services concerned with employment, crime prevention, child care, health, drug abuse, education, counseling, energy conservation and welfare or recreational needs. 24 CFR 58.34(a)(4)
- Inspections and testing of properties for hazards or defects. 24 CFR 58.34(a)(5)
- Purchase of insurance. 24 CFR 58.34(a)(6)
- Purchase of tools. 24 CFR 58.34(a)(7)
- Engineering or design costs. 24 CFR 58.34(a)(8)
- Technical assistance and training. 24 CFR 58.34(a)(9)
- Assistance for temporary or permanent improvements that do not alter environmental conditions and are limited to protection, repair, or restoration activities necessary only to control or arrest the effects from disasters or imminent threats to public safety including those resulting from physical deterioration. 24 CFR 58.34(a)(10)
- Payment of principal and interest on loans made or obligations guaranteed by HUD. 24 CFR 58.34(a)(11)

**Categorical exclusion not subject to the Federal laws and authorities cited in §58.5 (CENST)**

Select appropriate citation(s) from 24 CFR 58.35(b): (Check all that apply)

- Tenant-based rental assistance. 24 CFR 58.35(b)(1)
- Supportive services including, but not limited to, health care, housing services, permanent housing placement, day care, nutritional services, short-term payments for rent/mortgage/utility costs, and assistance in gaining access to local, State, and Federal government benefits and services. 24 CFR 58.35(b)(2)
- Operating costs including maintenance, security, operation, utilities, furnishings, equipment, supplies, staff training and recruitment and other incidental costs.
A Partner cannot legally complete the full analysis and compliance steps for all laws and authorities

• Partner Users cannot complete certain aspects of the review, including consultation or final findings and determinations
• The Partner makes suggestions and initial analysis, but the RE will make final determinations
• To ensure that the RE reviews each related law and authority, Partners may *not* reply to the final question on each screen (“Are formal compliance steps or mitigation required?”)
Related Laws and Authorities as a Partner

However, HEROS requires that each screen be fully complete before you can upload documents

• Respond to all questions using your best suggestions for the RE

• In the compliance determination box, explain your actions and suggestions
  • Be explicit about which responses are final and which are advisory
  • The RE will complete these screens using your feedback
This Worksheet was designed to be used by those “Partners” (including Public Housing Authorities, consultants, contractors, and nonprofits) who assist Responsible Entities and HUD in preparing environmental reviews, but legally cannot take full responsibilities for these reviews themselves. Responsible Entities and HUD should use the RE/HUD version of the Worksheet.

**Airport Hazards (CEST and EA) – PARTNER**

[https://www.hudexchange.info/environmental-review/airport-hazards](https://www.hudexchange.info/environmental-review/airport-hazards)

1. **To ensure compatible land use development, you must determine your site’s proximity to civil and military airports. Is your project within 15,000 feet of a military airport or 2,500 feet of a civilian airport?**
   - ☐ No → *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing that the site is not within the applicable distances to a military or civilian airport.*
   - ☑ Yes → *Continue to Question 2.*

2. **Is your project located within a Runway Potential Zone/Clear Zone (RPZ/CZ) or Accident Potential Zone (APZ)?**
   - ☐ Yes, project is in an APZ → *Continue to Question 3.*
   - ☐ Yes, project is an RPZ/CZ → *Project cannot proceed at this location.*
   - ☐ No, project is not within an APZ or RPZ/CZ
     → *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Continue to the Worksheet Summary below. Provide a map showing that the site is not within either zone.*

3. **Is the project in conformance with DOD guidelines for APZ?**
   - ☐ Yes, project is consistent with DOD guidelines without further action.
Performing Analysis - Summary

Partner User conducts initial analysis, uploads maps and documents

RE User completes all compliance requirements, makes findings and determinations.

2005 – Related Federal Laws and Authorities Summary (50/58)

Directions: Click on the Compliance Factor links in the first column in the chart below. The links will take you to a separate screen to review the specific Compliance Factor. After completing each Compliance Factor screen you will automatically return to this screen to continue.

<table>
<thead>
<tr>
<th>Compliance Factors</th>
<th>Are formal compliance steps or mitigation required?</th>
<th>Compliance Determinations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Airport Hazards</td>
<td></td>
<td></td>
</tr>
<tr>
<td>[Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D]</td>
<td>○ Yes □ No</td>
<td></td>
</tr>
<tr>
<td>Coastal Barrier Resources</td>
<td></td>
<td></td>
</tr>
<tr>
<td>[Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]]</td>
<td>○ Yes □ No</td>
<td></td>
</tr>
<tr>
<td>Flood Insurance</td>
<td></td>
<td></td>
</tr>
<tr>
<td>[Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]]</td>
<td>○ Yes □ No</td>
<td></td>
</tr>
<tr>
<td><strong>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Air Quality</td>
<td></td>
<td></td>
</tr>
<tr>
<td>[Clean Air Act, as amended, particularly section 176(c) &amp; (d); 40 CFR Parts 6, 51, 93]</td>
<td>○ Yes □ No</td>
<td></td>
</tr>
<tr>
<td>Coastal Zone Management</td>
<td></td>
<td></td>
</tr>
<tr>
<td>[Coastal Zone Management Act, sections 307(c) &amp; (d)]</td>
<td>○ Yes □ No</td>
<td></td>
</tr>
</tbody>
</table>
Unsure
After the Mitigation Measures Screen…

As a Partner User, you cannot proceed past this point in the environmental review. Please assign this review to the Responsible Entity (if Part 58) or HUD (if Part 50) Preparer to complete this review.

Before assigning the review, you are encouraged to preview the environmental review record and ensure that you have completed all required steps. Generate and review the preview of the environmental review record, using the button below, taking special care to ensure that all questions have complete and accurate responses and all supporting documentation. If necessary, use the menu on the left side of this screen to navigate through and edit the previous screens.

Generate Preview of Environmental Review Record

When you are satisfied with the review up to this point, reassign the environmental review to the Responsible Entity or HUD preparer by selecting Assign Review in the side menu. You are strongly encouraged to call the RE or HUD staff person to ensure availability and awareness of the environmental review record.

Go Back  Save and Exit
Tip - Save this document and email it to the RE when you assign the review
Side Menus Differ by User Role

**RE Users see:**
- Assign Review
- Initial Screen
- Project Summary
- Level of Review Determination
- Related Laws and Authorities
- Mitigation Measures and Conditions
- Environmental Finding
- Package
- Signature and Posting
- NOI-RROF
- RROF (7015.15)
- AUGF (7015.16)
- Complete and Archive
- Mitigation Follow-Up
- Reevaluation

**Partner Users see:**
- Assign Review
- Initial Screen
- Project Summary
- Level of Review Determination
- Related Laws and Authorities
- Mitigation Measures and Conditions
- Final Screen
- Mitigation Follow-Up
- Reevaluation

**HUD Users see:**
- Assign Review
- RROF (7015.15)
- AUGF (7015.16)
- Complete and Archive

The side menu for this review shows only the screens that you need access to in order to complete form 7015.16. To review the full environmental review record for monitoring or technical assistance purposes, return to the My Environmental Reviews Dashboard and open the review in View mode.
Demo #3: Tiered CEST Rehab
What’s Your Experience with Tiering?

- Never heard of it
- Have tried it
- Tier environmental reviews regularly
**Goal of tiering** = eliminate repetitive discussions of the same issues and to focus on the actual issues ripe for decision at each level of environmental review.

A tiered review consists of two stages:
1. A broad-level review
2. Subsequent site-specific reviews
Two Stages of Review

**Stage 1 - Broad-level review**: identify and evaluate the issues that can be fully addressed and resolved, notwithstanding possible limited knowledge of the project.

- ALSO establish the standards, constraints, and processes to be followed in the site-specific reviews.

**Stage 2 - Site-specific reviews**: evaluate the remaining issues based on the policies established in the broad-level review as individual sites are selected for review.

**Together**, the broad-level review and all site-specific reviews comprise a complete environmental review record.
Limitations on Activities

- The 7015.15 – RROF and 7015.16 – AUGF should be completed at the broad-level:
  - It is *not* necessary to get HUD approval on site-specific reviews.

- Funds cannot be spent or committed on a specific site or activity until both the broad-level review and the site-specific review have been completed for the site:
  - Refer to 24 CFR Part 58.22.
Why Tier?

**Pros**
- Save time & money on Request for Release of Funds, public notices
- Avoid repetitive analysis

**Cons**
- More challenging
- More room for error
# When to Tier

<table>
<thead>
<tr>
<th>When to Tier</th>
<th>When NOT to Tier</th>
</tr>
</thead>
</table>
| Preparing to conduct a program of similar or repetitive activities  
  • Example #1: single family home repairs  
  • Example #2: sidewalk repairs | Preparing to conduct unspecified activities using a single funding source  
  • Example: using CDBG funds to do any activity permissible under that program |
| Activities will be scattered but limited to a specific geographic range  
  • Example: neighborhood or defined portion of city | Sites have already been identified  
  • Example: constructing a new housing development |
| RE is familiar with HUD’s tiering policies and has discussed strategy with field staff | RE is new to the environmental review process and thinks tiering sounds easier |
Broad-Level Review: Project Description

Project description must define...

1. All contemplated activities
2. All proposed funding sources
3. Maximum number of units/properties
4. Average cost per unit
5. Geographic range
6. “Expiration date”
Consider each of required environmental laws and authorities and either...

• Resolve at the broad level
  • OR
• Define a protocol to achieve compliance at site-specific level
Compliance at Broad-Level

➤ Possible if full scope of project can be determined to comply with an environmental law, authority, or factor
  • May comply due to geography or activities involved (or a combination!)

➤ Example: Compliance based on location – Las Vegas
  • No Coastal Zones or Coastal Barriers in Nevada → compliance with CZMA & CBRA at broad level

➤ Example: Compliance based on activities – single family interior rehab
  • No new construction/ground disturbance → compliance with EO 11990, Wetlands Protection
### Examples of Compliance Determinations

<table>
<thead>
<tr>
<th>Good</th>
<th>Good</th>
<th>Bad</th>
</tr>
</thead>
<tbody>
<tr>
<td>Proposed activities are limited to interior rehabilitation with no potential for ground disturbance, which will have no effect on wetlands. Project is therefore in compliance with EO 11990 and Wetlands Protection requirements in 24 CFR Part 55.</td>
<td>Proposed project is in compliance with EO 11990 and Wetlands Protection requirements in 24 CFR Part 55, because there are no wetlands in the geographic range covered by this review. (See attached wetlands map provided by the US Fish and Wildlife Service.)</td>
<td>Proposed project complies with Part 55.</td>
</tr>
</tbody>
</table>
What if compliance cannot be achieved at Broad-Level?
   • If compliance cannot be achieved at broad level, broad-level review must define procedures to be followed at site-specific level

Protocol should define how to:
1. Determine compliance
2. Mitigate impacts where possible
3. Dismiss sites as appropriate
### Examples of Site-Specific Protocols

<table>
<thead>
<tr>
<th>Good</th>
<th>Good</th>
<th>Bad</th>
</tr>
</thead>
<tbody>
<tr>
<td>All actions will be mapped on FEMA-issued Flood Insurance Rate Maps (FIRMs). An 8-Step Process will be completed at the site-specific level for any sites located in a Special Flood Hazard Area (SFHA) and mitigation measures will be tailored to the site. An early warning system and emergency evacuation and relocation plan will be required for all sites in an SFHA.</td>
<td>All actions will be mapped on FEMA-issued Flood Insurance Rate Maps (FIRMs). Any sites located in a Special Flood Hazard Area (SFHA) will be rejected for this program.</td>
<td>Compliance will be achieved at site-specific level.</td>
</tr>
</tbody>
</table>
In addition to the related laws and authorities in 58.5 and 58.6, EAs must complete a more thorough NEPA review and consider all EA factors and analysis.

- Like all EAs, tiered EAs must include a finding of no significant impact (FONSI) prior to Request for Release of Funds.
  - Protocols must be specific and detailed to ensure that there will not be a significant impact on the human environment.
  - HEROS does not have a format for tiered EAs.
Completing Broad Level Reviews

Public Notice must be clear about the nature and scope of the proposal

- Plain language project description must communicate scale of the review to the public
- A sample notice is available on the HUD Exchange

Complete Request for Release of Funds process at broad level

- *But* do not commit funds to individual sites until site-specific review has been completed
Complete site-specific reviews as sites are identified

Determine and document compliance with all required laws and authorities that were not already resolved

- Follow protocols defined at broad level to concentrate on the pertinent issues

If site-specific activity does not conform to limits established at broad level, separate review is required
Recordkeeping

- Environmental review record is not complete without *both* broad-level and site-specific reviews
  - Site-specifics must identify corresponding broad-level review
  - Both parts should be filed together

- Avoid monitoring findings – make sure records are complete!
Reminder of Process

- Broad-level analysis
- RROF/AUGF process
  - Site-specific #1
  - Site-specific #2
  - Site-specific #3
  - Conduct work at site #1
  - Conduct work at site #2
  - Conduct work at site #3
Tiering in HEROS

**My Environmental Reviews (50/58)**
HEROS integrates guidance and assistance into the environmental review format, but it is not a substitute for learning and this system. Responsible Entities are urged to attend regular environmental trainings lead by HUD staff and ensuring that their environmental review records are accurate and complete.

- Start a new environmental review
- Go to tiered reviews

**My Tiered Reviews (50/58)**
Environmental reviews may be tiered to eliminate repetitive discussions of the same issues at subsequent levels of review. Development or when site-specific analysis or mitigation is not currently feasible and a more narrow or focused analysis is being consulting with your Field Environmental Officer (FEO) before initiating a tiered review.

HEROS integrates guidance and assistance into the environmental review format, but it is not a substitute for learning and this system. Responsible Entities are urged to attend regular environmental trainings lead by HUD staff and ensuring that their environmental review records are accurate and complete.

- Start a new broad-level/Tier 1 review
Project Name: South-Neighborhood-Rehab-Program

Environmental Review Record created on March 29, 2017 by Liz Zepeda.

- Indicates that field is required

- Project Name: South-Neighborhood-Rehab-

- HUD Funding Source:
Include only funding sources for which this review will fulfill HUD’s environmental review requirements. Do not include funding sources that will require a separate environmental review (e.g. if this project receives funding from both Part 50 and Part 58 programs).

<table>
<thead>
<tr>
<th>Grant/Project Number</th>
<th>HUD Program</th>
<th>Program Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>CDBG12345</td>
<td>Community Planning and Development</td>
<td>Community Development Block Grants (CDBG) (Entitlement)</td>
</tr>
</tbody>
</table>

Add Another Funding Source

- Estimated Total HUD Funded Amount: $1,250,000
- Estimated Total Project Cost: $2,500,000

- Does this project anticipate the use of funds or assistance from another Federal agency in addition to HUD?
  - No
  - Yes

- Indicate the date that the environmental review process for this project began: 3/1/17

- State / Local Identifier [optional]:

- Is this project funded by a program administered by a State Agency (i.e. CDBG or HOME)?
  - No
  - Yes

Responsible Entity (RE) Information:
- Organization Name: DISTRICT OF COLUMBIA
- Address: DEPARTMENT OF HUMAN SERVICES
  64 NEW YORK AVENUE, NE
  6TH FLOOR
Choosing Level of Review

1210 - Tiered Review: Level of Review (58)  Project Name: South-Neighborhood-Rehab-Program

What level of Review is required by the scope of the project?
Select the level of review

Categorical Exclusion subject to the Federal laws and authorities cited in §58.5 (CEST)

Select the applicable CEST Citations:

- [ ] 58.35(a)(1)
- [ ] 58.35(a)(2)
- [x] 58.35(a)(3)
- [ ] 58.35(a)(4)
- [ ] 58.35(a)(5)
- [ ] 58.35(a)(6)

Save and Go Back  Save and Continue
Description of the Proposed Project [24 CFR 50.21; 24 CFR 58.32; 40 CFR 1508.25]:

Provide a project description that captures the maximum anticipated scope of the proposal. It should include all contemplated actions which logically are, either geographically or functionally, a composite part of the project, regardless of the source of funding. Describe all physical aspects of the project, such as plans for multiple phases of development, size and number of buildings, and activities to be undertaken. Include details of the physical impacts of the project, including whether there will be ground disturbance. If applicable, indicate whether the project site will require acquisition or if the sponsor already has ownership.

This project entails the rehabilitation of single family residential homes located in the imaginary South Neighborhood neighborhood of Washington, DC. The scale of this project will include an estimated total of 50-60 homes. South Neighborhood has approximately 1,500 homes and is approximately half a square mile, so these 50-60 homes would be selected throughout the neighborhood. CDBG funds will be used to rehabilitate homes damaged during a monster attack in February, 2017. A maximum of $25,000 will be expended on a per-home basis. Most homes affected by the attack experienced window and roof damage, and most of the work is anticipated to be exterior rehabilitation; however, interior repairs will be necessary in other cases. In addition to CDBG funds, the project will be leveraged by private donations and local funds.

Project Location

If more than one zip code may be affected, select a representative zip code to validate. If you cannot validate the location now, be sure to do so before completing the review. In the Location Information text box specify street addresses and/or geographic boundaries where applications will be accepted or where projects will be selected.

Attach a map or photographs from a site visit in addition to a text description if appropriate.

City: Washington
State: District of Columbia
Zip Code: 20000

Location Information:

South Neighborhood is about 1/2 a square mile and is primarily residential. South Neighborhood is located in eastern DC and is bordered by Fake Street to the north, South Something Street to the east, Other Street to the west, and Yet Another Street to the south.
Approximately how large is the project area (geographic area where applications will be accepted or projects will be selected)?

1/2 square mile

What activities are involved in the project? (Check all that apply.)

- Acquisition
- Leasing
- Maintenance
- Repair/Improvement/Rehabilitation
- New construction/Reconstruction
- Demolition
- Disposition
- Removal of architectural barriers
- Soft Costs

What length of time does this tiered review cover?

3 Years

What is the maximum number of dwelling units or lots that will be addressed by this tiered review?

60

Save and Go Back  Save and Continue
Related Laws and Authorities

Determine where compliance is achieved at broad level

1251 – Tiered Review: Related Laws and Authorities (50/58)  Project Name: Mount-Rainier-SF-Rehab

Directions: Indicate whether compliance was achieved at the broad level review for each law and authority. If you have determined that due to the nature of the program, compliance has been achieved at the broad level of review and there is no need for additional follow up at site-specific level, check “Yes.” If further review at a site-specific level is needed, check “No.”

If compliance was achieved at the broad level, describe how and provide your source documentation. If necessary, summarize the supporting documentation and provide page numbers.

As a reminder, state and local requirements may differ from Federal requirements, and compliance with one does not guarantee compliance with the other.

<table>
<thead>
<tr>
<th>Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, 58.5, and §58.6</th>
<th>Was compliance achieved at the broad level of review?</th>
<th>Describe here compliance determinations made at the broad level and source documentation</th>
<th>Supporting Compliance Documentation Uploads</th>
</tr>
</thead>
<tbody>
<tr>
<td>Airport Hazards [Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D]</td>
<td><img src="https://i.imgur.com/1qQ5Q5.jpg" alt="Yes" /> <img src="https://i.imgur.com/5Q5Q5Q.jpg" alt="No" /></td>
<td></td>
<td><img src="https://i.imgur.com/5Q5Q5Q.jpg" alt="Upload" /></td>
</tr>
<tr>
<td>Coastal Barrier Resources [Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]]</td>
<td><img src="https://i.imgur.com/1qQ5Q5.jpg" alt="Yes" /> <img src="https://i.imgur.com/5Q5Q5Q.jpg" alt="No" /></td>
<td></td>
<td><img src="https://i.imgur.com/5Q5Q5Q.jpg" alt="Upload" /></td>
</tr>
<tr>
<td>Flood Insurance [Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1984 [42 USC 4001-4128 and 42 USC 5164a]]</td>
<td><img src="https://i.imgur.com/1qQ5Q5.jpg" alt="Yes" /> <img src="https://i.imgur.com/5Q5Q5Q.jpg" alt="No" /></td>
<td></td>
<td><img src="https://i.imgur.com/5Q5Q5Q.jpg" alt="Upload" /></td>
</tr>
</tbody>
</table>

STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & 58.5

<table>
<thead>
<tr>
<th>Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, 58.5, and §58.6</th>
<th>Was compliance achieved at the broad level of review?</th>
<th>Describe here compliance determinations made at the broad level and source documentation</th>
<th>Supporting Compliance Documentation Uploads</th>
</tr>
</thead>
<tbody>
<tr>
<td>Air Quality [Clean Air Act, as amended, particularly section 176(c) &amp; (c); 40 CFR Parts 6, 51, 37]</td>
<td><img src="https://i.imgur.com/1qQ5Q5.jpg" alt="Yes" /> <img src="https://i.imgur.com/5Q5Q5Q.jpg" alt="No" /></td>
<td></td>
<td><img src="https://i.imgur.com/5Q5Q5Q.jpg" alt="Upload" /></td>
</tr>
</tbody>
</table>
Written Strategies

Address only laws that must be considered at site-specific level

<table>
<thead>
<tr>
<th>Written Strategy</th>
<th>Project Name: South-Neighborhood-Rehab-Program</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Flood Insurance</strong> [Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154(a)]]</td>
<td></td>
</tr>
<tr>
<td><strong>Contamination and Toxic Substances</strong> [24 CFR 50.3(i) &amp; 58.5(i)(2)] (HUD Standard)</td>
<td></td>
</tr>
<tr>
<td><strong>Floodplain Management</strong> [Executive Order 11988, particularly section 2(a), 24 CFR Part 55]</td>
<td></td>
</tr>
<tr>
<td><strong>Historic Preservation</strong> [National Historic Preservation Act of 1966, particularly sections 106 &amp; 110; 36 CFR Part 800]</td>
<td></td>
</tr>
</tbody>
</table>
Finalizing Review

- Follow the same process to finalize tiered reviews in HEROS as you would for standard reviews
- Remember to provide clear public notice
Site-Specific Reviews

1240 - Site-Specific or Second Tier Reviews (50/58)  Project Name: South-Neighborhood-Rehab-Program

Ensure that the information provided on this screen and in the attached documents does not violate HUD's guidance on sensitive information. Be cautious when providing information that may endanger certain types of projects, such as domestic violence shelters. If your project location is sensitive and should be kept confidential, disclose neither the street address nor the services provided by the facility. Note that to maintain a degree of privacy does not mean a diminution of the environmental review responsibility. The same level of technical analysis and performance of environmental review requirements must be achieved in compliance with HUD environmental regulations.

Site-Specific Review Name: Site #1 - 123 Project Street

Site Address:
- Street: 123 Project Street
- City: Washington
- State: District of Columbia
- Zip: 20001

Upload your completed Site-Specific or Second Tier Review here:

File Upload: Upload
- Site 1 Checklist.pdf
- Site 1 Flood Map.pdf
- Site 1 SHPO Letter.pdf
- Site 1 NEPAssist Report.pdf

Add

Site-Specific Review Name: Site #2 - 987 Fake Street

Site Address:
- Street: 987 Fake Street
- City: Washington
- State: District of Columbia
- Zip: 20003

Upload your completed Site-Specific or Second Tier Review here:

File Upload: Upload
- Site 2 Checklist with Docs.pdf

Add
Other Levels of Review

- HEROS does not have formats for tiered EAs or EISs
- EA or EIS-level broad-level reviews should be created outside HEROS and uploaded when complete
Tiered reviews are archived on the HUD Exchange for 5 years.

HUD Exchange
Secretary Ben Carson

Environmental Review Records

HUD’s Environmental Review Records page houses environmental reviews made publicly available through the HUD Environmental Review Online System (HEROS). This includes environmental assessments, CEST reviews, and CEST reviews that converted to exempt.

Use the search filters below to find projects with recent environmental reviews. Reviews currently in public comment period will appear above archived reviews. Tiered reviews will be available for five years. For reviews in public comment period, send your comments to the person identified in the Environmental Review Record. If you have submitted an environmental review through HEROS for posting but do not see it on this website within 24 hours, submit an inquiry through Ask a Question. New or updated environmental reviews are posted here between 8 AM and 10 PM ET Monday through Saturday.

Environmental Review Records

Filter By

All Report Statuses
All States

Filter

Related Resources

- Environmental Review Main
- Environmental Impact Statements

Environmental Review Records

Great River Landing
Minneapolis, MN
Public comment available until 05/17/2017

Ebenezer Park Apartments
Minneapolis, MN
Public comment available until 05/09/2017

Owner Occupied Rehabilitation
Goshen, IN
Public comment available until 05/10/2017

Dickerson Landing Reconstruction Phase VI
Goshen, IN
Public comment available until 05/10/2017

Scenic Point Subdivision Phase II
Austin, TX
Public comment available until 05/16/2017
Example Tiered Review

Single family rehab program
- Weatherization program: replacing windows, doors, and insulation, sealing gaps

Mount Rainier, MD
- Borders on Washington, DC
- 1 square mile
- Historic district
## Broad Level Analysis

### 1251 - Tiered Review: Related Laws and Authorities (50/58)

**Project Name:** Mount-Rainier-SF-Rehab

**Directions:** Indicate whether compliance was achieved at the broad level review for each law and authority. If you have determined that due to the nature of the program, compliance has been achieved at the broad level of review and there is no need for additional follow up at site-specific level, check “Yes.” If further review at a site-specific level is needed, check “No.”

If compliance was achieved at the broad level, describe how and provide your source documentation. If necessary, summarize the supporting documentation and provide page numbers.

As a reminder, state and local requirements may differ from Federal requirements, and compliance with one does not guarantee compliance with the other.

<table>
<thead>
<tr>
<th>Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR 50.4, 50.5, and §58.6</th>
<th>Was compliance achieved at the broad level of review?</th>
<th>Describe here compliance determinations made at the broad level and source documentation</th>
<th>Supporting Compliance Documentation Uploads</th>
</tr>
</thead>
</table>
| **Airport Hazards**

[Clear Zones and Accident Potential Zones; 24 CFR Part 61 Subpart D)](#)

- Yes
- No

No portion of the project area is within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The closest airport is College Park Airport, approximately 2.7 miles northeast of the city. Therefore, compliance is achieved at the broad level.

[Upload: Airports Map.PNG]

| **Coastal Barrier Resources**

[Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]]

- Yes
- No

The project area is in Prince George’s County, MD, which does not contain any Coastal Barrier Units. Therefore, compliance is achieved at the broad level.

[Upload: Maryland CBRA Map.pdf]

| **Flood Insurance**

[Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act [42 USC 5021 et seq.]]

- Yes
- No

---

---
How this Project Would Comply

Compliance at Broad Level based on general Activities (e.g. SFR): Farmlands, CAA, SSA, WSR

Compliance at Broad Level based on Location: CBRA, Airport Hazards, ESA

Compliance at Broad Level based on specific Project Plans: Wetlands, CZMA, Noise, Explosive Hazards

Analysis required at Site-Specific: Floodplain Mgmt. & Insurance, Section 106, Contamination, EJ
Group 1 Determinations

**Air Quality**

[Clean Air Act, as amended, particularly section 706a & Part C]

- Yes
- No

The county is in non-attainment (marginal) for 8-hour ozone (2008). However, given the scope of the project, which is limited to single family rehab, the project is well below de minimis levels and in compliance with the Clean Air Act.

**Farmlands Protection**

[Farmland Protection Policy Act of 1981, particular policy]

- Yes
- No

The proposed project will be limited to repairs and rehabilitation and will not convert any undeveloped land. Therefore, it complies with the Farmlands Protection Policy Act.

**Sole Source Aquifers**

[Safe Drinking Water Act of 1974, as amended, particular policy]

- Yes
- No

Prince George’s County does not contain any EPA-designated sole source aquifers (see attached EPA map of Region 3). Further, this project is for rehabilitation of existing units and is therefore unlikely to have any impact on sole source aquifers.

**Wild and Scenic Rivers**

[Wild and Scenic Rivers Act of 1968, particularly policy]

- Yes
- No

This project is for rehabilitation of existing units and is therefore unlikely to have any impact on wild and scenic rivers. Further, Maryland has no designated Wild and Scenic Rivers, and there are no rivers on the National Rivers Inventory in Prince George’s County. See https://www.rivers.gov/maryland.php.
Group 2 Determinations

Coastal Barrier Resources

- Yes
- No

The project area is in Prince George's County, MD, which does not contain any Coastal Barrier Units. Therefore, compliance is achieved at the broad level.

Airport Hazards
Clear Zones and Accident Potential Zones: 24 CFR Part 150

- Yes
- No

No portion of the project area is within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The closest airport is College Park Airport, approximate 2.7 miles northeast of the city. Therefore, compliance is achieved at the broad level.

Endangered Species
Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402

- Yes
- No

The Indiana bat, which has been known to nest in attics, is listed within Prince George's County. Attics will be impacted by some repairs as part of this project. However, a species list from the US Fish and Wildlife Service (see attached letter received from US FWS on 5/11/17 and IPaC report generated on 4/11/17) confirms that the Indiana bat does not occur within Mount Rainier, which is entirely urban development.
Group 2 Documents

Key:
Purple outline = City border
Yellow line = measurement to nearest airport

United States Department of the Interior

U.S. Fish and Wildlife Service
Mid-Atlantic Fish and Wildlife Conservation Office
177 Admiral Cochrane Dr.
Annapolis, MD 21401

May 11, 2017

In Reply Refer To
Consultation Code: 123456789

Project Name: Sample Tiered Review
Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project.

To Whom It May Concern:
The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, under the jurisdiction of the U.S. Fish and Wildlife Service (Service) that may occur within the boundary of your proposed project and/or...
<table>
<thead>
<tr>
<th>Group 3 Determinations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Coastal Zone Management</strong>&lt;br&gt;[Coastal Zone Management Act, sections 307(c) &amp; (d)]&lt;br&gt;Yes  No&lt;br&gt;<strong>Maryland's Coastal Zone Management standards apply within Prince George's County. All actions must comply with those standards, which require any development or redevelopment of land for residential, commercial, industrial, or institutional purposes to use small-scale non-structural stormwater management practices and site planning that mimics natural hydrologic conditions, to the maximum extent practicable. Development or redevelopment must be consistent with this policy when channel stability and 100 percent of the average annual predevelopment groundwater recharge are maintained, nonpoint source pollution is minimized, and structural stormwater management practices are used only if determined to be absolutely necessary. Given the scope of this project, all activities should comply with this standard.</strong></td>
</tr>
<tr>
<td><strong>Explosive and Flammable Hazards</strong>&lt;br&gt;(Above-Ground Tanks)[24 CFR Part C]&lt;br&gt;Yes  No&lt;br&gt;<strong>The proposed project will not make any vacant unit habitable or otherwise increase residential density, so the project complies with Part 51 Subpart C. Additionally, no above ground storage tanks were identified within 1 mile of Mount Rainier city limits.</strong></td>
</tr>
<tr>
<td><strong>Noise Abatement and Control</strong>&lt;br&gt;[Noise Control Act of 1972, as amended by the Quiet Country Act]&lt;br&gt;Yes  No&lt;br&gt;<strong>The types of repairs involved in this project, including installing new windows, doors, and insulation, and sealing gaps, will improve noise attenuation. Site-specific noise evaluation is not required.</strong></td>
</tr>
<tr>
<td><strong>Wetlands Protection</strong>&lt;br&gt;[Executive Order 11990, particularly sections 2 &amp; 5]&lt;br&gt;Yes  No&lt;br&gt;<strong>The project area is nearly entirely developed and contains only one small wetland (see attached map from the USFWS Wetlands Mapper). This project is limited to repairs and rehabilitation of existing buildings and will not convert undeveloped land, expand the footprint of any buildings or paved areas, or involve any ground disturbance.</strong></td>
</tr>
</tbody>
</table>
### Written Strategy

In the section below, provide the policy, standard, or process to be followed in the site-specific review for each law, authority, and factor that will require completion of a site-specific review.

<table>
<thead>
<tr>
<th>Subject</th>
<th>Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Flood Insurance</strong></td>
<td>Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 (<a href="#">42 USC 4001-4128 and 42 USC 5154a</a>)</td>
</tr>
<tr>
<td><strong>Contamination and Toxic Substances</strong></td>
<td>[24 CFR 50.3(i) &amp; 58.5(i)(2)] (HUD Standard)</td>
</tr>
<tr>
<td><strong>Floodplain Management</strong></td>
<td>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</td>
</tr>
<tr>
<td><strong>Historic Preservation</strong></td>
<td>National Historic Preservation Act of 1966, particularly sections 106 &amp; 110; 36 CFR Part 800</td>
</tr>
</tbody>
</table>

**Project Name:** Mount-Rainier-SF-Rehab
Group 4: Compliance at Site Level

- **Flood Insurance** [Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 (42 USC 4001-4128)]
  All projects in FEMA-designated Special Flood Hazard Areas (SFHAs) will be required to maintain flood insurance. Therefore, all site-specific reviews will include a Flood Insurance Rate Map (FIRM). Projects within a SFHA must also provide proof of insurance.

- **Contamination and Toxic Substances** [24 CFR 50.3(i) & 58.5(i)(2)]
  There are three toxic releases within 1 mile of the project area (see attached NEPAassist report). Each site will be mapped in relation to those releases, and any within 3000 feet will be evaluated more closely to determine if the site is safe for occupancy. Given the small scale of this project, which is limited to minor weatherization actions, little can be done to remediate for toxics or contamination within the scope of this action; however, other funding sources will be considered for cleanup efforts if it is determined to be necessary as sites are evaluated.

- **Floodplain Management** [Executive Order 11988, particularly section 2(a); 24 CFR Part 55]
  FEMA FIRMs (see attached maps) show that only a small portion of Mount Rainier is located in a SFHA. There is a 100-year floodplain in the northern portion of the city and a 500-year floodplain south of that. The project area contains a floodway, but there are no existing homes within the floodway. Each site will be compared to FEMA maps to determine whether the property is within the 100-year floodplain. For any proposed projects within the 100-year floodplain, a 5-Step Process will be completed to evaluate practicable mitigation measures.

- **Historic Preservation** [National Historic Preservation Act of 1966, particularly sections 106 & 110; 36 CFR Part 800]
  Mount Rainier contains a historic district (see attached map) and about half of all houses in Mount Rainier were constructed prior to 1950. A procedural Programmatic Agreement (PA) was negotiated with the SHPO that outlines a process for the identification, evaluation and treatment of individual historic properties in site-specific reviews. Under the PA (see attached), proposals that involve only interior repairs and rehabilitation do not require further consultation or evaluation. For projects that would involve replacing key elements such as windows and doors on structures constructed in 1940 or earlier, the SHPO will be consulted at the site-specific level to determine the sensitivity of the building and ensure that all actions are consistent with historic standards. Proposals that would involve impacts to the exterior of buildings constructed after 1940 should be consistent with historical features to the extent practicable, but consultation with the SHPO is not required.

- **Environmental Justice** [Executive Order 12898]
  Mount Rainier has a significant minority population: 50% of the population is African American and 36% is Hispanic. To avoid Environmental Justice issues, projects with adverse environmental impacts will not be approved.
Site-Specific Environmental Review Record

**Project Name:** Mount Rainier Single Family Rehab - Site-Specific Review  
**Property:** 123 Project Street, Mount Rainier, MD 20712

**HUD Program(s):** CDBG  
**HUD Grant Number(s):** CDBG-2017-12345  
**Responsible Entity:** Mount Rainier, MD  
**Preparer:** Jane Doe, Community & Economic Development Specialist

**Telephone Number:** (301)123-4567  
**Month/Year:** May 2017  
**Estimated cost:** $50,000 total in renovation, including $25,000 in CDBG funds

**Project Description**

123 Project Street is a single family residence owned by a low income family. The home was constructed in 1928 and is located in Mount Rainier’s historic district. The renovations will consist of replacing the home’s aging windows, doors, and insulation to provide improved weather resistance and noise attenuation.

**Written Strategy**

In the section below is the policy, standard, or process to be followed in the site-specific review for each law, authority, and factor that will require completion of a site-specific review.

**Floodplain Management:** FEMA FIRMs (see attached maps) show that only a small portion of Mount Rainier is located in a SFHA. There is a 100-year floodplain in the northern portion of the city and a 500-year floodplain south of that. The project area contains a floodway, but there are no existing homes within the floodway. Each site will be compared to FEMA maps to determine whether the property is within the 100-year floodplain. For any proposed projects within the 100-year floodplain, the site-specific review will determine whether the 5-Step Process is required or whether the project is exempt from the 5- and 8-Step Process under 24 CFR 55.12(b)(2). If the project is considered "substantial improvement" under 55.2(b)(10), a 5-Step Process will be completed to evaluate practicable mitigation measures at the site-specific level.

**Basics of Site and Plans**

- Project location, proposed activities  
- Maps, photographs of site  
- Funding info

**Floodplain Management & Flood Insurance**

- FEMA Map  
- Proof of insurance (if in SFHA)  
- Completed 5-Step Process (if in SFHA + substantial improvement)

**Historic Preservation**

- Age of building, proximity to historic district  
- Documentation of compliance with PA (as appropriate)  
- Consultation history (as required)  
- Any required mitigation

**Toxics and Contamination**

- Map of site relative to any of the 3 sources of contamination  
- Discussion of potential risks and recommendations

**Environmental Justice**

- Confirmation that project has no adverse environmental impacts
Uploands and Downloads

Breaking news...
Questions?