



# 10 Key Takeaways

## Environmental Review and HEROS Submissions

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1. 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.
2. A Quick Reference Guide is available online – search “ENVIRONMENTAL REVIEW REQUIREMENTS FOR FIRST COMPONENT RAD CONVERSIONS”, document dated 2/29/16. Updated guidance will be issued in coming weeks, and will be posted to the RAD Resource Desk.
3. You should begin the process early, even as soon as you enter into a CHAP (if not sooner).
4. HUD cannot issue the RAD Conversion Commitment (RCC) until an environmental review has been completed.
5. If you have any debt financing, work through your lender to order required third-party environmental reports to avoid having to pay for a second report later.
6. PBRA and FHA transactions will require Part 50 Reviews (HUD conducts the Environmental Review). Non-FHA PBV transactions require Part 58 Reviews (Responsible Entity conducts the Environmental Review). Joint reviews for Part 50 and Part 58 programs are possible.
7. Pre-conversion spending is subject to environmental review. Environmental clearance is required from your Responsible Entity (RE) and/or local Public Housing Field Office before expending funds on pre-development activities, including for professional services that do not have a physical impact.
8. Responsible Entities are encouraged to use HUD recommended formats to document the environmental review record.

9. Environmental reports and documentation must cover all project activities or actions that are logically related to the RAD transaction, regardless of whether the activity is also assisted by HUD.
  
10. PHAs working with multi-phase conversions should discuss the project with their TM and local environmental staff as soon as possible to establish an environmental review strategy to avoid delays or duplication of effort.