

FY23 Section 202 NOFO – HEROS FAQs

1. How do applicants get HEROS access?

All documents submitted into HEROS must be prepared by an environmental consultant with prior HEROS experience and HEROS access. Please note that HEROS is operational between the hours of 7:00 AM to Midnight Eastern Time, Monday through Saturday. To get HEROS access, please use:

<https://files.hudexchange.info/resources/documents/Completing-a-HEROS-Access-Form-Request-Quick-Guide.pdf>. Another resource for HEROS access is: <https://www.hudexchange.info/resource/3150/heros-user-guide/>.

2. Are all the NEPA requirements applicable to a rehabilitation project for an existing facility or only for new construction?

The Section 202 Program is subject to the National Environmental Policy Act of 1969 (NEPA) and related Federal environmental authorities and regulations at 24 CFR part 50. As part of a review of an application under this NOFO, HUD will perform a preliminary environmental screen to assess major adverse environmental conditions. All documentation must be submitted into the [HUD Environmental Review Online System \(HEROS\)](#)

3. Our project has already received NEPA approvals for our project-based section 8 vouchers. Is it still necessary to complete the preliminary environmental screen for Section 202 Capital Advance funds using HEROS? May we instead submit our existing NEPA approvals?

HUD will not accept a previous NEPA approval even from a Part 50 review in place of the Section 202 NOFO requirements. First, that alternative submission is not provided for in the NOFO. Second, we would need to ensure that the previous Part 50 adequately covers the scope of work for the 202 NOFO proposal. Although it may be duplicative, the applicant should assign a new HEROS record to HUD per the Section 202 NOFO instructions. For additional information, please see Section III.F.7 of the NOFO.

4. If an environmental review identifies potential wetlands along a site's border, does the applicant need to have a wetlands expert provide a report (official delineation) for the 202 submission? The area in question would not be impacted by the development.

For application/initial screening purposes, a wetland professional would not be required if it's reasonably clear the wetland will not be impacted, as the questioner states. If it appears to be a close call, a professional delineation would be recommended, but HUD would entertain supporting the delineation occurring during a full environmental review post award, i.e. for a funded proposal.

HUD does screen for proposed projects that would include new construction in a wetland, but a professional delineation is not an application requirement or HEROS requirement. The applicant can fill out the wetlands HEROS screen by indicating that no wetland will be impacted and uploading supporting documentation, including an NWI map, satellite imagery if necessary, and site plan.

5. As part of the environmental submission on the HUD 202 application do applicants need to submit a Phase 1 (if there is no recommendation for a Phase 2) to HEROS?

All applicants must submit at a minimum, a Phase 1 in HEROS.