

Imminent Threat Exemption Checklist

Addendum to the Exempt/CENST format

for a Project that is Exempt under 24 CFR 58.34(a)(10)

HUD recommends using this checklist to confirm that a project undertaken in response to COVID-19 meets the conditions of the emergency exemption at § 58.34(a)(10). For guidance on the imminent threat exemption, refer to Notice CPD 20-07, *Guidance on conducting environmental reviews pursuant to 24 CFR Part 58 for activities undertaken in response to the public health emergency as a result of COVID-19*. Responsible Entities are encouraged to upload this Addendum to the project description screen in HEROS or attach it to the *Exempt/CENST format*.

Project Name:

Condition 1

Check the boxes below to confirm that the project will not alter environmental conditions. Documentation may consist of maps, reports, or written statements attached to the environmental review record.

The project will not irreversibly affect significant elements of properties listed on or eligible for listing on the National Register of Historic Places.

Provide documentation confirming that either (a) the project does not involve any historic properties or (b) all work proposed in historic properties is limited to temporary interior improvements that are reversible after the health emergency is over.

The project will not replace, reconstruct, or substantially improve structures within a special flood hazard area (SFHA) as determined by a current, preliminary, or pending Flood Insurance Rate Map (FIRM).

Provide documentation confirming that either (a) the project site is outside of the SFHA on any current, preliminary, or pending FEMA map or (b) the project does not involve replacing, reconstructing, or substantially improving any structures.

The project site is not impacted by contamination or hazardous substances.

Provide documentation (e.g. a report from [NEPAssist](#)) confirming that there is no known risk of contaminants or hazardous substances at the project site.

The project will not involve work that may affect threatened or endangered species or critical habitat.

Provide documentation confirming that either (a) there are no listed species or critical habitats in the action area, (b) the project does not involve any activities that could impact listed species or critical habitats.

The project will not result in new construction in a wetland.

Provide documentation confirming that either (a) there are no known wetlands on the project site or (b) the project does not involve new construction as defined in 24 CFR 55.2(b).

The project will not otherwise permanently alter environmental conditions.

Discuss any remaining environmental concerns, including a determination that the project will not result in permanent impacts, in the Project Description in HEROS or the Exempt/CENST format.

Condition 2

In the Project Description in HEROS or the Exempt/CENST format, include a brief statement describing how all activities are necessary to prevent, prepare for, or respond to the imminent threat to public health from COVID-19.