

# Plan to Implement Coordinated Environmental Review Process: Tribal Housing and Related Infrastructure

Prepared by: U.S. Department of Housing and Urban Development

In collaboration with: Tribal Housing and Related Infrastructure Interagency Task Force

Consisting of Representatives from:

Council on Environmental Quality  
U.S. Department of Agriculture  
U.S. Department of Commerce  
U.S. Department of Energy  
U.S. Environmental Protection Agency  
U.S. Department of Health and Human Services  
U.S. Department of Interior  
U.S. Department of Transportation  
Huslia Village  
Central Council of Tlingit and Haida Indian Tribes of Alaska  
Association Village Council Presidents Regional Housing Authority  
Sault Ste. Marie Tribe of Chippewa Indians  
The Choctaw Nation of Oklahoma  
Cherokee Nation and  
Northern Arapaho Tribe of the Wind River Reservation

April 14, 2022

This is a plan intended to guide the work of the Task Force. It is not intended to bind any agency or Tribe to expend resources or develop the deliverables outlined within the plan. The development of deliverables is subject to available resources and the timeframes for deliverables are goals subject to change. The Task Force intends the plan to be flexible, and will revisit and revise the plan as needed to respond to changing needs, resources and priorities.

## Background

In a March 2014 report to the Congressional committees entitled “Native American Housing: Additional Actions Needed to Better Support Tribal Efforts,” the Government Accountability Office (GAO) made several recommendations, including the establishment of a “coordinated Federal environmental review process for Tribal housing development.”<sup>1</sup> Relying in part on the GAO report, in December 2014, the Senate Report accompanying the Fiscal Year (FY) 2015 Department of Transportation and Department of Housing and Urban Development (HUD), and Related Agencies Appropriations Bill directed HUD to “collaborate with the Council on Environmental Quality (CEQ) and affected agencies . . . to develop a coordinated review process to simplify Tribal housing development and its related infrastructure needs.”<sup>2</sup>

The Working Group was formed, comprised of representatives from HUD (lead agency), the CEQ, the U.S. Environmental Protection Agency and the U.S. Departments of Health and Human Services, Interior, Transportation, Agriculture, Commerce, and Energy. The Working Group reviewed environmental review requirements and examined information collected from Tribes and Federal agencies. It became clear that no single effort or legislative change would ensure a coordinated and simplified environmental review process for Tribal housing and housing-related infrastructure projects; rather, an on-going effort among the agencies to discover commonalities and foster collaborative relationships was required. The Working Group focused on identifying measures that could be taken to coordinate agencies’ environmental review processes within the existing framework. Those measures are presented as recommendations in the Coordinated Environmental Review Process: Final Report, published on December 15, 2015 (2015 Final Report).<sup>3</sup>

The 2015 Final Report made the following recommendations:

1. Incorporate environmental review documents by reference
2. Develop common categorical exclusions
3. Address resource deficiencies at the Bureau of Indian Affairs (BIA, DOI)
4. Provide training for agency staff
5. Provide training for Tribes
6. Continue review of related environmental laws and authorities to identify opportunities for greater efficiencies
7. Create regional consortiums
8. Explore the development of an interagency environmental review automated tool
9. Explore HUD-specific regulatory and policy improvements
10. Create more predictable funding mechanisms
11. Establish an on-going environmental review interagency task force

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<sup>1</sup> GAO REP. NO. 14-255, at 34, *Native American Housing: Additional Actions Needed to Better Support Tribal Efforts* (March 2014), available at <http://www.gao.gov/assets/670/662063.pdf>.

<sup>2</sup> S. REP. NO. 113-182, at 121 (2014), accompanying S.2438, available at <https://www.congress.gov/113/crpt/srpt182/CRPT-113srpt182.pdf>.

<sup>3</sup> Coordinated Environmental Review Process Task Force, *Coordinated Environmental Review Process: Final Report*, available at <https://portal.hud.gov/hudportal/documents/huddoc?id=CoorEnvirReview.pdf>. <sup>4</sup> For more information on HUD’s Government-to-Government Tribal Consultation Policy, please visit [https://portal.hud.gov/hudportal/HUD?src=/program\\_offices/public\\_indian\\_housing/ih/codetalk/consult](https://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/ih/codetalk/consult).

## 12. Explore expanding the scope of this effort

The Working Group developed a draft Memorandum of Understanding (MOU) in 2016 and an Implementation Plan in 2017, consulting with Tribes throughout the process, in accordance with the HUD Government-to-Government Tribal Consultation Policy.<sup>4</sup> Due to HUD staffing deficiencies, neither the 2016 MOU nor the 2017 Implementation Plan were finalized, and the Working Group met infrequently in 2018 and 2019.

In 2019, the Senate Appropriations Committee directed the Department of Housing and Urban Development (HUD) to establish and lead a Tribal Housing and Related Infrastructure Interagency Task Force (THRIITF or Task Force), which included the same membership as the 2015 Working Group. The Committee directed the Task Force to: “address and implement the Working Group recommendations to continue the review of related environmental laws and authorities to identify opportunities for greater efficiencies; explore whether environmental reviews could be expedited if agencies which fund similar types of projects developed aligned categorical exclusions; and identify specific regulatory and policy improvements.”<sup>5</sup>

The Task Force met regularly in 2020 and 2021. During this time the Task Force expanded to include Tribal representatives and developed a draft Implementation Plan. The Task Force held three consultation sessions to receive feedback and input from Tribal leaders on the draft Implementation Plan. The consultation webinars were held on June 21, 2021<sup>6</sup>, September 13, 2021<sup>7</sup>, and October 7, 2021<sup>8</sup>. Tribal feedback confirmed the recommendations and Action Items in the draft Implementation Plan. In total, the Task Force received fifty-one comments throughout the consultation process. Of these comments, eleven (11) reflected the desire for Tribes and agencies to coordinate to create one environmental review, eleven (11) were about HUD’s environmental review process and policies, seven (7) were Bureau of Indian Affairs (BIA) specific and/or specific about BIA and HUD coordination, five (5) were about historic preservation and cultural resources, and four (4) were about floodplain issues. The remaining comments included suggestions for regional training, statutory changes to allow Tribes to assume environmental responsibility for other Federal programs, creating more categorical exclusions and greater collaboration on compliance for Endangered Species, Wetlands and other laws and authorities.

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<sup>4</sup> For more information on HUD’s Government-to-Government Tribal Consultation Policy, please visit [https://portal.hud.gov/hudportal/HUD?src=/program\\_offices/public\\_indian\\_housing/ih/codetalk/consult](https://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/ih/codetalk/consult).

<sup>5</sup> Senate Report 116-109, pages 124-125, available at: <https://www.appropriations.senate.gov/imo/media/doc/FY2020%20HUD%20Appropriations%20Act,%20Report%20116-109.pdf>.

<sup>6</sup> HUD sent a formal consultation request on behalf of the Task Force on May 27, 2021. The letter is available at [https://www.hud.gov/sites/dfiles/PIH/documents/DTL\\_Coordinated\\_Environmental\\_%20Review\\_Process\\_Implementation\\_Plan\\_05.27.21.pdf](https://www.hud.gov/sites/dfiles/PIH/documents/DTL_Coordinated_Environmental_%20Review_Process_Implementation_Plan_05.27.21.pdf).

<sup>7</sup> HUD sent a formal consultation request on behalf of the Task Force on September 1, 2021. The letter is available at [https://www.hud.gov/sites/dfiles/PIH/documents/DTL\\_Tribal\\_Consultation\\_on\\_Coordinated\\_Environmental\\_Implementation\\_Plan.pdf](https://www.hud.gov/sites/dfiles/PIH/documents/DTL_Tribal_Consultation_on_Coordinated_Environmental_Implementation_Plan.pdf).

<sup>8</sup> Id.

The Task Force reviewed all the comments and to address the comments received, added additional details to Implementation Plan Action Item 11, Easing paperwork burdens for administrative activities for HUD programs, and a new Action Item 12 that describes ways BIA and HUD can coordinate to reduce duplication.

### **Implementation Plan for the Recommendations of the 2015 Final Report**

The Task Force proposes the following actions to implement the recommendations of the 2015 Final Report. Many of the Action Items relate to more than one recommendation. One of the Action Items, Action Item (1), is not tied to a recommendation, because it was presented during the listening sessions and comment period for 2017 draft Implementation Plan<sup>9</sup> as well as consultation for this Implementation Plan. The Task Force will develop communication and work plans for the implementation actions. Following the Action Items is a table with the Task Force's goals for the timing of the Action Items.

**Action Item (1):** Develop a tool for Tribes and agencies to facilitate coordinated environmental reviews to reduce duplication of effort for environmental reviews for housing and housing-related infrastructure projects.

**Recommendation(s) addressed:** This Action Item stems from the listening sessions and comments on the status report. It is not discussed as a recommendation in the 2015 Final Report.

**Status:** Commenters expressed a preference for a single, simple process for an environmental review that anticipates the use of the review by multiple Federal agencies and meets all individual agency requirements. The Task Force used a consultant to interview Tribes to gain further information to understand the scope, need and objectives of this single process. After interviewing Tribes and Federal agencies, the consultant presented recommendations to the Task Force on the substance and format of a tool to facilitate the development of an environmental review that may satisfy multiple Federal agencies. Specifically, the tool will leverage existing processes and readily available information to identify the environmental requirements for each agency. The tool will expand to include other guidance tools and training the Task Force develops. The tool will enable the user, a Tribe and/or Federal agency, to identify all the environmental requirements for projects with multiple funding sources, allowing the user to develop an environmental review that could be used and/or adopted by others. The Task Force will formally consult with Tribes on the tool.

**Action Item (2):** Receive regular periodic Tribal input

**Recommendation(s) addressed:** Create regional consortiums; Establish an on-going environmental review interagency task force

**Status:** The 2015 Final Report proposed utilizing regional consortiums to maintain a robust dialogue with Tribes during implementation. Several commenters recommended taking this a step further and having Tribal members in the working group. On March 4, 2021, HUD issued a Dear Tribal Leader letter

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<sup>9</sup> HUD sent a letter to Tribal Leaders on behalf of the Task Force on February 27, 2017 asking for comments on a Status Report to inform the 2017 implementation plan. The letter and Status Report are available at [https://www.hud.gov/program\\_offices/public\\_indian\\_housing/ih/codetalk/resources/THRIITF](https://www.hud.gov/program_offices/public_indian_housing/ih/codetalk/resources/THRIITF)

seeking nominations for Tribal members to join the THRIITF<sup>10</sup>. The Task Force received nominations for seven (7) Tribal representatives, and all have been added to the Task Force. Tribal members include representatives from the following Alaskan Tribes- Huslia Village, Central Council of Tlingit and Haida Indian Tribes of Alaska, Association Village Council Presidents Regional Housing Authority, as well as Sault Ste. Marie Tribe of Chippewa Indians, Michigan, The Choctaw Nation of Oklahoma, Cherokee Nation and Northern Arapaho Tribe of the Wind River Reservation. The Task Force meets monthly.

In addition, the Task Force plans to develop a list of regional consortiums and hold regular meetings or listening sessions on implementation work at regional consortiums to ensure that Tribes have opportunities to provide input and to facilitate information-sharing between Tribes.

**Action Item (3):** Develop common categorical exclusions

**Recommendation(s) addressed:** Develop common categorical exclusions

**Status:** Most Federal agencies develop categorical exclusions for certain activities that, absent extraordinary circumstances, normally do not individually or cumulatively result in significant effects to the human environment. Some agencies are developing new categorical exclusions that are similar to those from another agency, such as BIA developing one similar to an IHS categorical exclusion. The Task Force will continue to explore the potential for common categorical exclusions by identifying the most common housing and housing-related infrastructure activities and seeking ways to work with agencies to develop common or substantively similar categorical exclusions that can be established into relevant agencies' NEPA procedures.

Any work on establishing new or revising existing categorical exclusions involves public review and comment in the Federal Register. Changes to agency categorical exclusions also involve review by the CEQ to ensure conformity with the CEQ NEPA Implementing Regulations. Many agencies establish or revise categorical exclusions through rulemaking and therefore must consider the agencies' willingness or ability to change their regulations. Establishing or revising categorical exclusions involves a significant amount of time, effort, and coordination.

**Action Item (4):** Create guidance on planning projects

**Recommendation(s) addressed:** Create more predictable funding mechanisms; Provide training for Tribes

**Status:** The 2015 Final Report discussed approaching the issue of predictability of funding mechanisms as a planning issue. During listening sessions, several commenters identified that planning on a broad level is needed and identified where better planning would be helpful. Commenters also shared best practices, such as pre-screening during initial site planning.

The Task Force aims to develop guidance to plan projects, with accompanying resources to facilitate the planning process.

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<sup>10</sup> HUD sent a formal letter requesting nominations on March 4, 2021. The letter is available at [https://www.hud.gov/sites/dfiles/PIH/documents/DTL%203-4-21%20Tribal%20Housing%20and%20Related%20Infrastructure%20Interagency%20Task%20Force%20\(THRIITF\).pdf](https://www.hud.gov/sites/dfiles/PIH/documents/DTL%203-4-21%20Tribal%20Housing%20and%20Related%20Infrastructure%20Interagency%20Task%20Force%20(THRIITF).pdf)

The following could be addressed:

- Pre-screening based on contemplated use and funding. The pre-screening could also identify when a BIA NEPA review is needed for leasing actions. For example, if the intended use of the land is housing, establishing a pre-screen process to determine if the property is suitable for development based on HUD environmental review factors.
- Planning for multiple sources of funding. Exploring connections and ways to align BIA trust resource plans, HUD required Indian Housing Plans and IHS required Preliminary Engineering Reports.

As guidance on project planning is drafted and finalized, Tribal input will be essential and accomplished through formal Tribal consultation

**Action Item (5):** Develop resources to encourage wider use of NEPA efficiency tools

**Recommendation(s) addressed:** Incorporate environmental review documents by reference; provide training for agency staff; Provide training for Tribes

**Status:** The Task Force will develop a guidance document to encourage Federal agencies and Tribes to use incorporation by reference as well as adoption and identification and use of lead agencies to promote a coordinated environmental review.

In addition to the NEPA efficiency tools available for all agencies, the Task Force will continue to explore other collaboration opportunities where Tribes have assumed NEPA responsibility. For instance, besides HUD's Part 58 statutory authority that allows Tribes to assume Federal environmental responsibility, both BIA and IHS have legal authority to allow Tribes to conduct NEPA reviews.

Through the Helping Expedite and Advance Responsible Tribal Homeownership (HEARTH) Act, Tribes can submit their own regulations (regarding leasing programs as well as NEPA) to the Secretary of the Interior for approval under the HEARTH Act. Upon approval, these Tribes<sup>11</sup> can carry out their own NEPA processes for leasing operations without BIA oversight or approval. Indian Health Service has legal authority under Title V (Indian Self Determination and Education Assistance Act\*, ISDEAA<sup>12</sup>) that allows Tribes to carry out Federal programs (including the NEPA compliance component) without IHS/HHS oversight. Title V compacting under the ISDEAA requires successful completion of a planning phase and demonstration of three years of financial management capability.

Finally, the Task Force will explore and promote the ability of Tribes to use the Federal permitting process outlined in Title 41 of the Fixing America's Surface Transportation Act (FAST-41). The Infrastructure Investments and Jobs Act<sup>13</sup> expanded the ability of Tribes to participate in FAST-41, removing the \$200 million investment threshold for Tribally sponsored projects on Tribal land. FAST-41

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<sup>11</sup> A list of approved Tribes is available at <https://www.bia.gov/bia/ots/hearth>.

<sup>12</sup> According to an IHS factsheet on Title I and Title V, "Eligibility for Title V requires that the Tribe or Tribal Organization (1) successfully complete a planning phase, (2) request participation in the Tribal Self-Governance Program by Tribal resolution or other official action by the governing body of each Tribe to be served, and (3) demonstrate three fiscal years of financial stability and financial management capability." 25 USC 5383, 42 C.F.R. §§ 137.15-23.

[https://www.ihs.gov/sites/selfgovernance/themes/responsive2017/display\\_objects/documents/TitlelandV.pdf](https://www.ihs.gov/sites/selfgovernance/themes/responsive2017/display_objects/documents/TitlelandV.pdf)

<sup>13</sup> Public Law No: 117-58 Section 70801 amended 42 USC 4370m(6)(A)(iii).

is a voluntary process that helps ensure a deliberate, transparent, and predictable Federal environmental review and permitting process for certain large, complex infrastructure projects. It does not alter any applicable statutory or regulatory requirement, environmental law, regulation, or review process, or public involvement procedure.

**Action Item (6):** Ensure that review requirements are being applied consistently

**Recommendation(s) addressed:** Provide training for agency Staff; Provide training for Tribes

**Status:** Tribal consultation sessions identified a need for consistent interpretation and application of environmental review requirements by both Federal agencies and by Tribes. Tribal feedback made it clear that continued emphasis on consistency is needed for HUD programs<sup>14</sup>, as well as for all Federal funding sources. The Task Force plans to work with agencies and Tribes to identify how to provide appropriate training. This may include seeking additional funding and/or utilizing more cost-effective training methods such as webinars, recorded training sessions, internal training, peer to peer exchanges, developmental assignments, etc. It may also include leveraging training, for example by bringing multiple agencies to Tribal training events. Training or guidance will be provided for any changes that come out of the coordinated environmental review process effort. In addition, the Task Force will work with agencies and Tribes to assess whether policy and/or regulatory changes are needed to facilitate consistency, and whether there are any other pathways to consistent interpretation and application of review requirements. Finally, the Task Force plans to identify ways to assess whether consistency is being accomplished.

**Action Item (7):** Identify opportunities for greater efficiencies within the Related Environmental Laws and Authorities

**Recommendation(s) addressed:** Continue review of related environmental laws and authorities to identify opportunities for greater efficiencies

**Status:** The 2015 Final Report highlighted Tribal Historic Preservation Officer (THPO) resource shortages as a critical issue that contributes to National Historic Preservation Act (NHPA) inefficiencies. Other sources of inefficiency include agencies and Tribes differing opinions as to when archaeological surveys should be required. The Task Force will explore developing a more consistent approach. The Task Force also plans to develop guidance and training on sharing completed NHPA Section 106<sup>15</sup> documents to avoid the time and expense associated with duplicative consultation. The 2015 Final Report highlighted inefficiencies with floodplain mapping, specifically that many Tribal areas are not mapped and that agencies differ in their acceptance of alternatives to Federal Emergency Management Agency (FEMA) maps. The Task Force will work to identify floodplain management tools and seek alignment, where possible, of floodplain analysis across agencies.

To the extent possible, the Task Force will also explore opportunities for efficiencies such as programmatic agreements for Endangered Species Act and aligning processes in other related laws and authorities such as Section 404 of Clean Water Act, Executive Order (EO) 11988 (floodplains), EO 13690

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<sup>14</sup> Over the past few years, HUD has created a robust system of in-person trainings, suggested formats, online training modules, and an online environmental review system and other resources to supplement and explain HUD environmental regulations, notices, guidance, and forms. Please visit the HUD Exchange Environmental Review website for more information, available at: <https://www.hudexchange.info/programs/environmental-review/>.

<sup>15</sup> 54 U.S.C. § 306108.

Establishing a Federal Flood Risk Standard and EO 11990 (wetlands). The Task Force will work to identify and include relevant outside groups and Federal agencies in these efforts.

**Action Item (8):** Develop a coordinated environmental review process website

**Recommendation(s) addressed:** Incorporate environmental review documents by reference; Provide training for agency staff; Provide training for Tribes; Create more predictable funding mechanisms

**Status:** The Task Force has created a website ([https://www.hud.gov/program\\_offices/public\\_indian\\_housing/ih/codetalk/resources/THRIITF](https://www.hud.gov/program_offices/public_indian_housing/ih/codetalk/resources/THRIITF)) on the coordinated environmental review process initiative and will continue to build this website with tools, guidance, and training materials as they are developed.

**Action Item (9):** Expand effort to include actions that are not housing-related

**Recommendation(s) addressed:** Explore expanding the scope of this effort

**Status:** Tribes engage in infrastructure projects and other actions such as broadband, transportation and transmission projects that are not related to housing. As the efforts of the coordinated environmental review progress, commenters felt that it would be beneficial for other actions to have the same environmental review. Commenters felt the Task Force should keep the possibility of expanding the scope of the effort in mind as implementation of the 2015 Final Report progresses until a logical opportunity presents itself. Interviews with Federal agencies revealed that housing and infrastructure projects may also involve the Bureau of Reclamation for water projects and the U.S. Army Corps of Engineers (USACE) and U.S. Fish and Wildlife (FWS) for permitting. The Task Force will keep possible expansion in mind and begin to assemble information about the other Federal agencies and funding programs that will be involved.

**Action Item (10):** Develop an interagency environmental review automated tool

**Recommendation(s) addressed:** Explore the development of an interagency environmental review automated tool

**Status:** An environmental review automated tool, HEROS, already exists for HUD environmental reviews that helps users develop, document, and manage environmental reviews.<sup>16</sup> Tribes are not required to use this tool. Commenters identified interest in having an automated tool that covers all funding sources. This tool could expand upon HEROS, incorporating additional guidance and helping collaboration among Tribes and Federal agencies when multiple sources of funding are used through document management and process improvements. The tool will need to accommodate the requirements of all Federal agencies, including any simplified process that is developed by the Task Force. Since developing a simplified process has been identified as the primary priority for the Task Force and will greatly influence such a tool, the Task Force plans to wait to develop an automated tool until after a process is determined. Developing an automated tool will also involve contract support and decisions and agreements amongst the Task Force agencies on resources.

**Action Item (11):** Ease paperwork burdens for administrative activities (HUD)

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<sup>16</sup> HUD has developed HUD Environmental Review Online System (HEROS) to complete a HUD environmental review.

**Recommendation(s) addressed:** Explore HUD-specific regulatory and policy improvements

**Status:** The 2015 Final Report contained two recommendations for HUD – updating HUD’s acceptable storage tank separation distance regulations and easing paperwork burdens for administration activities. HUD accomplished one of these recommendations by finalizing HUD’s Acceptable Separation Distance rule on January 24, 2020.<sup>17</sup> The final rule allows HUD-assisted projects near stationary aboveground propane storage tanks with a capacity of 1,000 gallons or less if the storage tanks comply with the National Fire Protection Association’s NFPA 58 Liquefied Petroleum Gas Code (2017).

Tribal consultations sessions held in 2021 provided HUD with feedback to develop guidance on emergency repairs and the length of time an environmental review is valid (expand beyond five years). Finally, commenters requested more training on HUD forms, aggregation, and re-evaluation as well as some case studies that apply HUD’s requirements to different projects. HUD is committing to developing this guidance and developing and delivering the requested training.

**Action Item 12:** HUD and BIA coordination

**Recommendation(s) addressed:** Address resource deficiencies at BIA

**Status:** The 2015 Final Report recommended addressing resource deficiencies at BIA. Resource decisions are not within the control of the Task Force; however, through Tribal consultation the Task Force has identified ways to improve the process when environmental reviews are required by both BIA and HUD for a project. BIA and HUD will continue to collaborate at the regional level to reduce duplication of environmental compliance for Section 184 loan guarantees<sup>18</sup>. In addition, BIA and HUD will continue to explore other collaboration opportunities, including review and alignment, where possible, of HEARTH Act and Part 58 and BIA Home Improvement Program and HUD programs.

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<sup>17</sup> See 24 CFR Part 51, Subpart C.

<sup>18</sup> Section 184 of the Housing and Community Development Act of 1992 (Pub. L. 102-550, approved October 28, 1992), as amended by the Native American Housing Assistance and Self-Determination Act of 1996 (Pub. L. 104-330, approved October 26, 1996), established the Section 184 program to provide access to sources of private financing to Indian families, Indian housing authorities, and Indian tribes that otherwise could not acquire housing financing because of the unique legal status of Indian land.

Action Item	Action Item Detail
◇= very heavy lift ●=heavy lift □= medium lift Δ=light lift * =not a THRIITF item (HUD only item)	
<b>FY 2022 goals</b>	
Develop a coordinated approach (1)	◇ Develop online tool
Receive Regular periodic Tribal input (2)	□ Identify existing regional consortiums and engage in Tribal consultation on deliverables
Develop common categorical exclusions (3)	◇ Review agency categorical exclusions and identify ones agencies should consider revising or establishing to achieve greater alignment
Develop a coordinated environmental review process website (8)	Δ Maintain and enhance THRIITF website
Ease paperwork burdens for administrative activities (HUD) (11)	* Develop and deliver training on forms, aggregation, and case studies. Develop guidance on length of environmental review validity and emergency repairs.
HUD and BIA coordination (12)	● Continue coordination efforts for Section 184 loan guarantee program and BIA lease approvals; explore coordination and alignment of HEARTH/Part 58 and BIA HIP
<b>FY 2023 goals</b>	
Receive Regular periodic Tribal input (2)	□ Participate in regional consortiums and engage in Tribal consultation on deliverables
Create project planning guidance (4)	● Draft guidance on project planning
Ensure consistency (6)	□ Develop plan to improve consistency through training
Identify opportunities for greater efficiencies (7)	□ Establish sub-team to develop archaeological survey guidance
	□ Establish sub-team to develop guidance on sharing completed Section 106 documents
	□ Develop plan to implement efficiencies in other laws and authorities
Develop a coordinated environmental review process website (8)	Δ Maintain and enhance THRIITF website
<b>FY 2024 goals</b>	
Receive regular periodic Tribal input (2)	□ Participate in regional consortiums and engage in Tribal consultation on deliverables
Develop resources to encourage the use of NEPA efficiency tools (5)	● Develop NEPA tool resources
Develop resources to encourage the use of NEPA efficiency tools (5)	◇ Develop guidance to use NEPA efficiency tools such as incorporation by reference as well as adoption and lead agencies
Ensure consistency (6)	□ Implement agency staff training
Identify opportunities for greater efficiencies (7)	◇ Negotiate archeological survey guidance
	● Negotiate guidance on sharing completed Section 106 documents
Develop a coordinated environmental review process website (8)	Δ Maintain and enhance THRIITF website

Action Item	Action Item Detail
◇= very heavy lift   ●=heavy lift   □= medium lift   Δ=light lift   * =not a THRIITF item (HUD only item)	
<b>FY 2025 goals</b>	
Receive regular periodic Tribal input (2)	□ Participate in regional consortiums and engage in Tribal consultation on deliverables
Identify opportunities for greater efficiencies (7)	◇ Implement plan for efficiencies for laws and authorities
Develop a coordinated environmental review process website (8)	Δ Maintain and enhance THRIITF website
Develop an interagency environmental review automated tool (10)	● Begin to develop business case and needs of system to begin scoping costs and securing funding
<b>FY 2026 goals</b>	
Receive regular periodic Tribal input (2)	□ Participate in regional consortiums and engage in Tribal consultation on deliverables
Develop an interagency environmental review automated tool (10)	◇ Secure funding for automated tool
Develop a coordinated environmental review process website (8)	Δ Maintain and enhance THRIITF website