



U.S. Department of Housing and Urban Development  
Community Planning and Development

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**Special Attention of:**

CPD Division Directors  
CPD Representatives  
SHOP Grantees  
SHOP Affiliates  
Responsible Entities

**Notice: CPD-16-12**

**Issued: August 8, 2016**

**Expires:** This notice is effective until amended, superseded, or rescinded.

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Subject: Environmental Review Procedures for Self-Help Homeownership Opportunity Program (SHOP) under 24 CFR Part 50 and Part 58

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## **I. INTRODUCTION**

### **A. PURPOSE**

The purpose of this notice is to combine CPD Notice 01-09 - Modified Environmental Processing for Self-Help Homeownership Opportunity Program (SHOP) Fiscal Year 2001 Legislative Change Notice, and CPD Notice 98-10 – Modified Environmental Processing for Self-Help Homeownership Opportunity Program. HUD’s Environmental Regulations at 24 CFR Part 50 and 58 provide a method for analyzing a project and its potential environmental impacts to determine whether it complies with the National Environmental Policy Act (NEPA) and related laws and authorities. This notice continues to implement Section 202 of the American Homeownership and Economic Opportunity Act of 2000 (AHEO) (Pub. L. 106-569, 114 Stat. 2944, approved December 27, 2000) to permit reimbursement of organizations, consortia and affiliates under SHOP for their acquisition of land prior to approval of environmental review. The notice also continues to authorize HUD field offices under certain circumstances to conduct compliance reviews in accordance with 24 CFR Part 50 – Protection and Enhancement of Environmental Quality. Attachment A of this notice has been updated to provide more information to subrecipients on the information they must provide to the HUD field office CPD Director. The notice replaces CPD Notices 98-10, 01-09, 98-04 and 97-02.

### **B. BACKGROUND**

Section 11 of the Housing Opportunity Program Extension Act of 1996 authorizes local and state governments to perform the environmental review for SHOP housing projects as follows:

“(m) ENVIRONMENTAL REVIEW – A grant under this section shall be considered to be funds for a special project for purposes of section 305(c) of the Multifamily Housing Property Disposition Reform Act of 1994.”

Implementing regulations cite special projects at § 58.1(b)(7) and the SHOP program at § 58.1(b)(9). In both cases, the regulations identify local and state governments as the Responsible Entity (RE) for performing the environmental review at § 58.2(a)(7)(ii)(c), as follows:

“(C) For non-profit organizations and other entities, the unit of general local government, Indian tribe or Alaska native village within which the project is located that exercises land use responsibility, or if HUD determines this infeasible, the county, or if HUD determines this infeasible, the State;...”

In the event a RE declines to assume responsibility for the review, HUD CPD staff will perform the environmental review under 24 CFR Part 50 and complete HUD Environmental Review Online System (HEROS) - form HUD-4128 to document compliance with the National Environmental Policy Act (NEPA).

SHOP permits reimbursement of organizations, consortia and affiliates under the SHOP for acquisition of land prior to approval of environmental review (42 U.S.C. 12805 note (d)(2)(A)). Eligible expenses under the SHOP program include:

"(A) Land acquisition.--Acquiring land (including financing and closing costs), which may include reimbursing an organization, consortium, or affiliate, upon approval of any required environmental review, for nongrant amounts of the organization, consortium, or affiliate advanced before such review to acquire land."

**(The AHEO amendment is limited to the SHOP program. All other forms of HUD assistance continue to prohibit land acquisition with nongrant funds prior to completion of environmental review.)**

## II. POLICY

Generally, the acquisition of land is considered an activity that limits the choice of reasonable alternatives. However, for SHOP under § 58.22(e):

“Self-Help Homeownership Opportunity Program (SHOP). In accordance with section 11(d)(2)(A) of the Housing Opportunity Program Extension Act of 1996 (42 U.S.C. 12805 note), an organization, consortium, or affiliate receiving assistance under the SHOP program may advance nongrant funds to acquire land prior to completion of an environmental review and approval of a Request for Release of Funds (RROF) and certification, notwithstanding paragraph (a) of this section. Any advances to acquire land prior to approval of the RROF and certification are made at the risk of the organization, consortium, or affiliate and reimbursement for such advances may depend on the result of the environmental review. This authorization is limited to the SHOP program only and all other forms of HUD assistance are subject to the limitations in paragraph (a) of this section.”

**1. The commitment or expenditure of non-HUD funds:** Organizations, consortia, and affiliates may advance non-HUD funds for purposes of land acquisition before: (i) HUD approval of HUD form HUD-7015.15 (Part 58) or HEROS - form HUD-4128 (Part 50), or (ii) the RE's finding of exemption (§ 58.71(c)); and may receive reimbursement from SHOP upon completion of the environmental review and HUD approval of form HUD-7015.15 (Part 58) or HEROS - form HUD-4128 (Part 50) or upon notification from the RE that it has determined that the acquisition is exempt.

HUD is not required to reimburse land acquisition costs of an organization, consortium, or affiliate if the environmental review determines that the land is not environmentally suitable for the development of housing or is in non-compliance with environmental authorities. **The organization, consortium, or affiliate that advances funds for property acquisition does so at its own risk regarding the outcome of the environmental review.**

**2. The commitment or expenditure of HUD Funds:** Organizations, consortia, or affiliates may not commit or expend SHOP funds for land acquisition prior to: (i) completion of the environmental review and HUD's approval of form HUD-7015.15 (Part 58) or HEROS - form HUD-128 (Part 50), or (ii) the RE's finding of exemption (§ 58.71(c)). SHOP funds may be used to reimburse an organization, consortium, or affiliate for a property acquired with nongrant funds only upon completion of the environmental review and HUD approval of form HUD-7015.15 (Part 58) or HEROS - form HUD-4128 (Part 50) or upon notification from the RE that it has determined that the acquisition is exempt.

**3. Responsible Entity's Finding of Exemption (§ 58.71(c)):** § 58.34(a)(12) and (b) allows an exemption for any of the categorical exclusions listed in § 58.35(a) provided that there are no circumstances which require compliance with any other Federal laws and authorities cited in § 58.5. Organizations, consortia, or affiliates do not have to submit form HUD-7015, and no further approval from HUD is needed by the recipient for the drawdown of funds to carry out exempt activities and projects. However, the RE must document in writing its determination that each activity or project is exempt and meets the conditions specified for such exemption under § 58.34. For example, if there are no circumstances which require compliance with any other Federal laws and authorities cited in § 58.5, then an exemption finding can be made for "individual actions" (§ 58.35(a)(4)) on a one- to four-family dwelling or an individual action on a project of five or more units developed on scattered sites when the sites are more than 2,000 feet apart and there are not more than four units on any one site. Also, notwithstanding any exemptions, the RE must review the proposed individual action for compliance with § 58.6.

### **III. MODIFIED ENVIRONMENTAL PROCESSING**

The subrecipient and the HUD Field Office should make every reasonable effort to have the RE (unit of general local government, Indian tribe, Alaska native village, county or State) perform the environmental review when practicable. When other HUD funding is involved with the project such as HOME or CDBG, coordination must be made with the RE to perform the environmental review to include all HUD funding sources. Program funding can be used to compensate the RE to perform the environmental review on behalf of the subrecipient. When the RE jurisdiction in which the project is located declines or is unable to perform the environmental review procedure under 24 CFR Part 58, the HUD CPD field office may ask for a letter explaining why they are unable to complete the review on behalf of the subrecipient. If the HUD field office CPD Director determines that the environmental review can be completed under 24 CFR Part 50 the subrecipients must supply the HUD Field Office with information that would help HUD complete the environmental review. (See Attachment A.)

The following requirements apply when the unit of general local government, Indian tribe, Alaska native village, county or State authorized to perform the environmental review has declined

or is unable to perform the environmental review and the subrecipient requests HUD to carry out the environmental review.

As set forth in § 50.3(h) for HUD grant programs in which the funding approval must occur before the selection of properties, a successful applicant shall:

“(1) Supply HUD with all available, relevant information necessary for HUD to perform for each property any environmental review required by this part;

(2) Carry out mitigating measures required by HUD or select alternate eligible property; and

(3) Not acquire, rehabilitate, convert, lease, repair or construct property, nor commit or expend HUD or local funds for these program activities with respect to any eligible property, until HUD approval of the property is received.”

These requirements notwithstanding, as described in Section I above, organizations, consortia, and affiliates may advance non-HUD funds for purposes of land acquisition before: (i) HUD approval of HEROS - form HUD-4128; and may receive reimbursement from SHOP upon completion of the environmental review and HUD approval of HEROS - form HUD-4128.

## **RESPONSIBILITIES**

This notice and the protocol contained in **Attachment A** define the responsibilities of all parties involved in the environmental review prior to release of SHOP grants funds. Involved are: recipients (i.e., the national nonprofit organization receiving the SHOP grant), the subrecipient (i.e., the local affiliate awarded a SHOP grant by the recipient for land acquisition and/or infrastructure), the RE (which is the unit of general local government, Indian tribe, Alaska native village, county or State authorized to perform the environmental review), and the HUD field office CPD Director.

### **A. Recipient’s environmental responsibility**

SHOP program recipients are responsible for the following:

- (1) All program and environmental requirements.
- (2) The submission of **form HUD-7015.15 – Request for Release of Funds and Certification (hereafter RROF)**, both signed by the recipient, to the appropriate local HUD field office CPD Director. The recipient must complete only **Part 3 of form HUD-7015.15. Parts 1 and 2 of form HUD-7015.15** will have been completed and signed by the RE.

- (3) The approval of the local HUD field office CPD Director of the RROF under Part 58 or written notification that HUD has completed the environmental review under Part 50, and notifying the subrecipients that they may commence work.

## **B. Subrecipient's environmental responsibility**

SHOP program subrecipients are responsible for the following:

- (1) negotiating an arrangement with the RE (unit of general local government, Indian tribe or Alaska native village within which the project is located that exercises land use responsibility) for the performance of the environmental review. If not feasible, or if the RE is unwilling to undertake such review, the subrecipient must, in close coordination with the recipient, notify the local HUD field office CPD Director. The CPD Director may ask for a letter from the local government declining to perform the environmental review or simply the name, title, address, and phone number of the local government representative who communicated the negative decision. Subrecipients may choose: (i) to request HUD to ask the county or State to perform the environmental review, or (ii) to supply HUD with all available and relevant information requested in Attachment A and needed for HUD to perform the environmental review in a timely manner;
- (2) supplying the RE and HUD with information on the location of the properties (street address where available) and the nature and scope of the activities to be undertaken along with all available environmental information (See Attachment A);
- (3) carrying out mitigating measures required by the RE or HUD or selecting an alternate eligible property;
- (4) preparing a cover letter for the RROF indicating its agreement to abide by any special conditions resulting from the environmental review, when the environmental review is done by a RE, and submitting it to the recipient (the National Organization that received the funds directly from HUD) with the RROF that the RE has signed. The recipient must then sign the RROF and submit it to the local HUD field office CPD Director. HUD must allow the public a 15-day objection period from the date of its receipt of the RROF, or from the time specified in the notice published pursuant to § 58.70 of the environmental review regulations, whichever is later, before it can approve the release of funds. If the environmental review is done by HUD, no RROF is required and the recipient may authorize the subrecipient to commence work upon written notification from the local HUD field office that the environmental review is completed;

- (5) complying with the prohibition on the commitment or expenditure of any SHOP funds or nonfederal funds for any program activity other than exempt costs or use of non-HUD funds for land acquisition, until HUD has notified the recipient that it has completed its environmental review or approved the RROF and the recipient has authorized the subrecipient to proceed;
- (6) reporting to the entity performing the environmental review any changes in the scope of the project and any changes in environmental conditions; and
- (7) providing data for the RE or HUD's performance of the environmental review when requested (See Attachment A).

### **C. Responsible Entity (RE) environmental responsibility**

The RE shall determine whether NEPA environmental assessment is required and shall also determine whether the assisted activities will trigger thresholds for other applicable Federal environmental laws and authorities. A RE is the unit of local government, Indian tribe or Alaska native village that exercises land use responsibility over the proposed SHOP property location (or, if the local HUD field office determines that the involvement of these entities is infeasible, the county or State).

The RE is requested to:

- (1) assume environmental responsibility under 24 CFR Part 58;
- (2) determine the appropriate level of environmental review;
- (3) conduct the environmental review in compliance with 24 CFR Part 58;

*If there has been a determination of exemption under § 58.71(c), document and maintain all findings in an Environmental Review Record and provide a copy to the recipient for its project files.*

- (4) prepare and disseminate or publish, as appropriate, a Notice of Finding of No Significant Impact (FONSI), a Notice of Intent to Request Release of Funds (NOI/RROF) or a combined FONSI notice and NOI/RROF. The FONSI and the combined notice require a 15-day public comment period from the date of publication or, if no publication, 18 days from the date of mailing and posting, before the RROF can be submitted to HUD. (Should the RE or HUD determine that exceptional circumstances pertain to the project, the FONSI and a combined notice require a 30-day public comment period before the RROF can be

submitted to HUD.) The NOI/RROF requires a 7-day comment period from the date of publication or, if no publication, 10 days from the date of mailing and posting, before the RROF can be sent to HUD;

- (5) execute the certification portion of the RROF by completing only **Parts 1 and 2 of the HUD form-7015.15** and by dispatching the form to the recipient, who must complete only **Part 3 of HUD form-7015.15** before providing the form to HUD. The RE must also include a description of any special conditions (§ 58.71(b));
- (6) transmit the executed RROF to the subrecipient for submission to the recipient who will subsequently submit it to the HUD field office CPD Director;
- (7) reevaluate properties and activities where the scope of the project or environmental conditions have changed; and
- (8) document and maintain all findings in an Environmental Review Record and provide a copy to the recipient for its project files. Adhere to any special environmental conditions or mitigation measures required by the RE in carrying out the SHOP activities.

#### **D. HUD Field Office CPD Director and staff responsibilities**

##### **(1) Responsibilities for processing under Part 58:**

These are the responsibilities when the HUD Field Office is processing under Part 58, which is the normal procedure. When an RE has agreed to undertake the environmental review for a subrecipient's project, the HUD Field Office CPD Director and staff shall:

- (a) advise the RE and the subrecipient of the procedures to be followed under Part 58;
- (b) arrange for technical assistance as needed;
- (c) monitor RE/subrecipient environmental compliance;
- (d) approve the RROF submitted by the recipient at the end of the 15-day statutory waiting period allowed for public objection to the release of funds or any later period specified in the NOI/RROF (§24 CFR 58.74);
- (e) obtain the CPD Director's signature as the HUD Authorizing Officer on form HUD-7015.16 - Authority to Use Grant Funds; and



- (f) inform the RE/subrecipient that form HUD-7015.16 - Authority to Use Grant Funds has been approved.

## **(2) Responsibilities for processing under Part 50:**

When an RE declines or is unable to perform processing under Part 58, then these are the responsibilities for the modified procedure.

In accordance with 50.32, the field CPD Director and staff may use any information supplied by the subrecipient or its contractor, but are to independently evaluate the information, be responsible for its accuracy, and supplement the information, if necessary, to conform to the requirements of Part 50. The CPD Director and staff must:

- (a) Document the Department's compliance in HEROS - form HUD-4128;
- (b) prepare the environmental review in HEROS – form HUD-4128 with the information provided by the subrecipient and maintain the Environmental Review Record; and
- (c) upon satisfactory completion of the review, obtain the CPD Director's certification as the HUD Approving Official in HEROS – form HUD-4128 and dispatch the written notification to the recipient and include an electronic copy of the Environmental Review Record generated from HEROS.

## **IV. OTHER**

### **A. Environmental consultant and administrative costs**

SHOP administrative funds may be used to obtain information that the subrecipients are responsible for supplying to the HUD Field Office under this notice for environmental processing. An environmental review is not required before using SHOP funds for this purpose. Section 58.34(a)(1) and (3) respectively exclude from environmental review procedures both “environmental and other studies” as well as “administrative and management activities.” This exclusion extends to the costs of environmental consultants engaged by the subrecipient and/or payments to local governments for this service.

### **B. Other suggested “time-savers”**

- 1. When offering training for their subrecipients, recipients are encouraged to invite HUD Field Office staff to participate. Generally, HUD field environmental officers, if available

from any of the HUD Field Offices, are the technical specialists best able to provide HUD environmental training and support to subrecipients considering the use of SHOP funding.

2. To assure prompt HUD Field Office outreach and partnership with subrecipients, recipients are encouraged to contact the appropriate HUD Field Offices and provide the HUD Field Office CPD Director with a list of subrecipients immediately upon award of SHOP funding to their subrecipients.
3. When other Federal, State, Tribal or local agencies have prepared an environmental assessment or other environmental analysis for a property (or neighborhood) which the subrecipient had selected for the use in the local SHOP program, these documents should be requested and used to the extent possible. Council on Environmental Quality (CEQ) regulations at 40 CFR 1506.5(a) require HUD to independently evaluate environmental information submitted by the subrecipient and be responsible for its accuracy, as well as to verify (but not redo) acceptable work.

#### C. HUD environmental website

For more information on preparing environmental reviews, see the HUD environmental website at: <https://www.hudexchange.info/environmental-review/>

#### D. Directory of Field CPD Directors and Field Environmental Officers

- (a) <https://www.hudexchange.info/manage-a-program/cpd-field-office-directory/>;
- (b) <https://www.hudexchange.info/environmental-review/hud-environmental-staff-contacts/>

## ATTACHMENT A – HUD ENVIRONMENTAL REVIEW CLEARANCE

Please provide the requested information and documentation for environmental clearance.

A. Project Name –

B. Funding Information –

Provide the SHOP grant number and funding amount. Include information about other HUD funding, and non-HUD funding (grant number and funding amount). Estimated Total Project Cost.

C. Grant Recipient Information –

Provide the Name of the Organization, Point of Contact, email, phone number and address.

D. Project Description -

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. Include if any infrastructure improvements will be under taken. If applicable, indicate whether the project site will require acquisition or if the sponsor already has ownership.

E. Project Location -

Provide a street address for your project, including zip-code. 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. 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. Include site map, and photos.

F. Project Activities –

What activities are involved in the project?

Acquisition

Leasing

Maintenance

Repair/Improvement/Rehabilitation

New Construction/Reconstruction

Demolition

Disposition

Removal of architectural barriers

Soft Costs

Will the project result in a change of land use?

Yes

No

What is the planned use of the affected property (after completion)?

- Vacant lands
- Public Facility
- Nonresidential building(s)
- Residential building(s)
  - Single family
  - Multi-family

G. If repair/rehabilitation, report the repair/rehabilitation costs and related structure values, if conversion, repair, minor or major rehabilitation is being proposed.

- (1) Structure value before repair/rehab \$
- (2) Repair/rehab costs (estimate) \$
- (3) Structure value after repair/rehab \$

Complete the appropriate sections based on the activities involved in the project:

- For repair or minor rehabilitation<sup>1</sup> of existing structures: Complete Part I (Noise Abatement<sup>2</sup> and Control (Part I))
- For individual actions (can include acquisition, disposition, demolition, construction and conversion) on land acquisition on new construction for up to four housing units **or** for five or more units of housing on scattered sites where the housing sites are more than 2000 feet apart and there are not more than four units on one site: Complete Part I (Noise Abatement and Control (Part I))
- For major rehabilitation (major rehabilitation is anything that does not fall in the maintenance or minor rehabilitation definition): Complete Part I (Noise Abatement and Control (Part II)) and Part II
- For other actions: Complete Part I (Noise Abatement and Control (Part II)) and Part II. These projects include new construction, reconstruction, demolition, and acquisition of undeveloped land, (other than individual action), conversion from one land use to another, and infrastructure development

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<sup>1</sup> Minor rehabilitation” is defined as --

- In the case of a building for residential use with one to four units: rehabilitation when the density is not increased beyond four units and the land use is not changed
- In the case of a multifamily residential building: rehabilitation when the unit density is not changed more than 20 percent, the project does not involve a change in land use from residential to non-residential, and the estimated cost of rehabilitation is less than 75% of the total estimated cost of replacement after rehabilitation.

<sup>2</sup> HUD’s noise standards may be found in 24 CFR Part 51, Subpart B. For proposed new construction in high noise areas, the project must incorporate noise mitigation features.

**Part I: Related Laws and Authorities** Complete the worksheet in the links provided, and include any requested documentation such as maps, photos, environmental reports, calculations, and correspondence.

**Air Quality –**

<https://www.hudexchange.info/resources/documents/Airport-Hazards-Partner-Worksheet.docx>

**Airport Hazards –**

<https://www.hudexchange.info/resources/documents/Airport-Hazards-Partner-Worksheet.docx>

**Coastal Barrier Resources –**

<https://www.hudexchange.info/resources/documents/Coastal-Barrier-Resources-Act-Partner-Worksheet.docx>

**Coastal Zone Management –**

<https://www.hudexchange.info/resources/documents/Coastal-Zone-Management-Act-Partner-Worksheet.docx>

**Endangered Species –**

<https://www.hudexchange.info/resources/documents/Endangered-Species-Act-Partner-Worksheet.docx>

**Environmental Justice –**

<https://www.hudexchange.info/resources/documents/Environmental-Justice-Partner-Worksheet.docx>

**Explosives and Flammable Facilities -**

<https://www.hudexchange.info/resources/documents/Explosives-Partner-Worksheet.docx>

**Farmlands Protection –**

<https://www.hudexchange.info/resources/documents/Farmlands-Partner-Worksheet.docx>

**Flood Insurance –**

<https://www.hudexchange.info/resources/documents/Flood-Insurance-Partner-Worksheet.docx>

**Floodplain Management –**

<https://www.hudexchange.info/resources/documents/Floodplain-Management-Partner-Worksheet.docx>

**Historic Preservation –**

<https://www.hudexchange.info/resources/documents/Historic-Preservation-Partner-Worksheet.docx>

**Noise Abatement and Control (Part 1) –**

<https://www.hudexchange.info/resources/documents/Noise-CEST-Partner-Worksheet.docx>

**Noise Abatement and Control (Part 2) –**

<https://www.hudexchange.info/resources/documents/Noise-EA-Partner-Worksheet.docx>

**Site Contamination (Single Family) –**

<https://www.hudexchange.info/resources/documents/Toxics-Single-Partner-Worksheet.docx>

**Site Contamination (Multi-Family (more than 4 units) –**

<https://www.hudexchange.info/resources/documents/Toxics-Multifamily-Partner-Worksheet.docx>

**Sole Source Aquifers -**

<https://www.hudexchange.info/resources/documents/Sole-Source-Aquifers-Partner-Worksheet.docx>

**Wetlands Protection -**

<https://www.hudexchange.info/resources/documents/Wetlands-Partner-Worksheet.docx>

**Wild and Scenic Rivers -**

<https://www.hudexchange.info/resources/documents/Wild-Scenic-Rivers-Partner-Worksheet.docx>

**Part II: Environmental Assessment Analysis**

**Environmental Assessment Factors** [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. **All conditions, attenuation or mitigation measures have been clearly identified.**

<https://www.hudexchange.info/resource/3306/environmental-assessment-factors-guidance/>

**Impact Codes:** Use an impact code from the following list 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 which may require an Environmental Impact Statement

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>LAND DEVELOPMENT</b>		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design		
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff		

Environmental Assessment Factor	Impact Code	Impact Evaluation
Hazards and Nuisances including Site Safety and Noise		
Energy Consumption		
<b>SOCIOECONOMIC</b>		
Employment and Income Patterns		
Demographic Character Changes, Displacement		
<b>COMMUNITY FACILITIES AND SERVICES</b>		
Educational and Cultural Facilities		
Commercial Facilities		
Health Care and Social Services		
Solid Waste Disposal / Recycling		
Waste Water / Sanitary Sewers		
Water Supply		
Public Safety - Police, Fire and Emergency Medical		

Environmental Assessment Factor	Impact Code	Impact Evaluation
Parks, Open Space and Recreation		
Transportation and Accessibility		
<b>NATURAL FEATURES</b>		
Unique Natural Features, Water Resources		
Vegetation, Wildlife		
Other Factors		

**Statement of Purpose and Need for the Proposal** [40 CFR 1508.9(b)]:

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.

**Additional Studies Performed:**

**Field Inspection** (Date and completed by):

**List of Sources, Agencies and Persons Consulted** [40 CFR 1508.9(b)]:



**List of Permits Obtained:**

Provide a list of permits, reviews, and approvals that are required for project construction.

**Public Outreach [24 CFR 50.23 & 58.43]:**

Provide your FONSI/FOSI notice dissemination list. Also, describe any additional public meetings and hearings that were held as part of or were relevant to the environmental review.

**Cumulative Impact Analysis:**

Identify 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 [40 CFR 1508.9]:**

Identify 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:**

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

**Summary of Findings and Conclusions:**

Identify the main points of analysis in the Environmental Assessment. The summary should include any potential impacts of the proposed project, both beneficial and potentially adverse. The summary must also discuss any changes to the proposal necessary to avoid significant impacts.