



**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**  
WASHINGTON, DC 20410-1000

## Site-Specific Environmental Review

### Multifamily Energy and Water Conservation Pay for Success Pilot

#### **Part 1 of 2: To be completed by intermediary**

An environmental review is an evaluation of a project and its potential environmental impacts to determine whether it complies with all applicable environmental laws and authorities. All HUD-assisted projects are required to undergo an environmental review to evaluate environmental impacts. The analysis considers both the project's potential effect on the environment and the potential effect of the environment on the project, site, and end users.

An environmental review must be performed before any funds, regardless of the source, are committed to a project. Documentation of the environmental review must be maintained in an environmental review record. This record describes all proposed activities, evaluates the proposal's potential environmental impacts, and documents compliance with all applicable environmental laws and authorities. For more information on general environmental review requirements, refer to the [Environmental Review page on the HUD Exchange](#).

This form is part of a programmatic environmental review and represents one part of a larger, program-level environmental review record. This form should be used only to initiate site-specific reviews for individual HUD-assisted properties undertaking energy and water conservation retrofits under the Multifamily Energy and Water Conservation Pay for Success Pilot. A broad-level environmental review has already established that this program complies with many environmental laws and authorities, and defined protocols to comply with those that require site-specific analysis. This form should not be used for any other program or for projects that do not conform to the limits established in the broad-level review established for this program.

How to use this site-specific review form:

- This form must be completed for each site identified for participation in this program. Adjacent buildings or sites may be reviewed together.
- The intermediary will complete Part 1 of 2 (this form) and submit it to HUD. This submission should contain any relevant documents, including floodplain maps, contamination reports, and all other documents specified below. The intermediary should work with the property owner to determine what environmental review documents already exist and may be used as part of the intermediary's submission to HUD.
- HUD will complete Part 2 of 2 (a separate form), which may require additional consultation with the intermediary. When all requirements are met and the form is complete, HUD will upload both forms and all accompanying documents to HEROS (the HUD Environmental Review Online System, a tool for preparing and maintaining HUD's environmental review records). At this

point, the environmental review is complete and the intermediary may begin completing the proposed activities.

**Intermediary:** Click or tap here to enter text.

**Property Owner:** Click or tap here to enter text.

**Address(es) of building(s) covered by this site-specific review:**

Click or tap here to enter text.

**Project Description:**

Provide a detailed project description that captures the maximum anticipated scope of the proposal, including clear descriptions of all proposed physical changes. Impacts that should be described include, but are not limited to:

- Ground disturbance
- Increases in impervious surfaces or building footprint
- Changes to windows, doors, or roofs
- Whether rehabilitation and repairs will affect building interior, exterior, or both

Click or tap here to enter text.

**Total Cost of Retrofit:** Click or tap here to enter text.

## Coastal Barrier Resources Act

Sites located within units of the Coastal Barrier Resources (CBR) System are not eligible for the Pay for Success Pilot, and will be rejected. The following states contain CBR units: Alabama, Connecticut, Delaware, Florida, Georgia, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, New Jersey, New York, North Carolina, Ohio, Puerto Rico, Rhode Island, South Carolina, Texas, Virgin Islands, Virginia, Wisconsin

### 1. Select one of the following:

- Project is not located in a state with CBR units (**no map required**).
- Project is located within one of the states listed above, but project itself is not located in a CBR unit.

### 2. If the project is located in one of the identified states, provide a map. Go to

<https://www.fws.gov/ecological-services/habitat-conservation/cbra/maps/mapper.html> to generate a map demonstrating that project is not within a CBR unit.

## Flood Insurance and Floodplain Management

All projects in FEMA-designated Special Flood Hazard Areas (SFHAs) will be required to maintain flood insurance under the National Flood Insurance Program (NFIP) and must comply with Floodplain Management regulations in 24 CFR Part 55 to avoid impacts associated with occupancy and modification of floodplains where there are practicable alternatives.

**1. Provide a Flood Insurance Rate Map.** All site-specific reviews must include a Flood Insurance Rate Map (FIRM) with the site clearly marked. Use FEMA's Flood Map Service Center at <https://msc.fema.gov/portal> to generate a FIRM.

**2. Indicate whether the project site contains a SFHA.**

- Project is not located in a SFHA.
- Project site is in (or partially in) a SFHA.

**3. If the project site contains a SFHA:**

- o **Provide proof of insurance for any buildings in a SFHA.** This may be either a copy of the flood insurance policy declaration or a paid receipt for the current annual flood insurance premium and a copy of the application for flood insurance. Note that HUD may not provide assistance to SFHA sites in communities that are not participating or in good standing in the NFIP.
- o **Compliance with Part 55 may be required if there is a SFHA on the site.** Work with HUD to evaluate requirements and impacts and identify practicable mitigation measures.

## Wetlands Protection

Under Part 55, HUD will reject any new construction (as defined in Executive Order 11990 and 24 CFR 55.2(b)(8)) with the potential to destroy or modify a wetland unless there are no practicable alternatives.

**1. Does this project include any ground disturbance or new construction as defined in 24 CFR 55.2(b)(8)?**

- No ground disturbance or new construction is anticipated. **(No map required.)**
- The project may involve ground disturbance or other new construction.

**2. Use the [National Wetlands Inventory \(NWI\)](#) to determine whether there is a wetland that could be impacted by the ground disturbance.** For more information on defining wetlands and secondary sources where the NWI is not conclusive, consult 24 CFR 55.2(b)(11).

**Provide a map with the site clearly marked and indicate whether there is a wetland that could be impacted.**

- There is no wetland that could be impacted by this project.
- Project may affect a wetland. **Compliance with Part 55 may be required if there is wetland that may be impacted.** Work with HUD to evaluate requirements and impacts and identify practicable mitigation measures.

## Contamination

All property proposed for use in HUD programs must be free of hazardous materials, contamination, toxic chemicals and gases and radioactive substances, where a hazard could affect the health and safety of occupants or conflict with the intended utilization of the property. The environmental review must include a review of previous uses of the site and other evidence of contamination on or near the site to assure the proposed occupants are not impacted by any of these hazards.

**Submit all of the following to HUD:**

1. **A report of nearby toxic sites and releases** using EPA's Envirofacts at <http://www.epa.gov/enviro/index.html>, NEPAAssist at

<http://nepassisttool.epa.gov/nepassist/entry.aspx>, or a similar service. To obtain a map using Envirofacts, insert the project address in the box under the title "Get the Envirofacts" and press enter. Print the map and list of EPA regulated sites. For each EPA regulated site listed, print the compliance report.

2. **Documentation showing past uses of the site.** The past use investigation must go back to the property's first developed use or 1940, whichever is earlier. Examples of types of documentation could be any of the following:
  - o Historical aerial photographs of the site showing the status of the site through time. These photos may be available at the local library or the local planning department. Ask if they have access to Sanborn Fire Insurance Maps or other historical mapping data.
  - o The city or county may also have local records such as tax files, land title records, or historic zoning data that can show past uses. Historical sources can also include newspaper archives, community organizations and historical societies.
  - o A Phase I Environmental Assessment Report. If a Phase I report is provided, none of the above toxics information is needed (the Envirofacts map, historic aerial photographs, and the letter from someone with specific information on the site.) These items will be included in the Phase I. HUD will accept a Phase I ESA older than 1 year for the Pay for Success program as long as conditions have not significantly changed at the site since the report. Older Phase Is may have to be supplemented by a current report of nearby toxic sites and releases.
3. **A discussion of potential adverse impacts, if any.** If hazards were found that could affect the health and safety of the occupants, all impacts must be mitigated or the site rejected.

## Historic Preservation

HUD encourages the rehabilitation of historic buildings and the preservation of irreplaceable resources like archeological sites that convey centuries of human cultural activity. The National Historic Preservation Act (NHPA), 54 U.S.C. 300101 et seq., directs each Federal agency to protect historic properties and to avoid, minimize, or mitigate possible harm that may result from agency actions. The review process, known as Section 106 review, is detailed in 36 CFR Part 800. Early consideration of historic places in project planning and full consultation with interested parties are key to effective compliance with Section 106. The State Historic Preservation Officer (SHPO) and/or Tribal Historic Preservation Officer (THPO) are primary consulting parties in the process.

1. **Determine if a [Programmatic Agreement \(PA\)](#) exempts proposed projects from Section 106.** If a Part 50 PA identifies all proposed activities as being exempt from consultation requirements, no further compliance is required. HUD provides a [Section 106 Agreement Database](#) to assist with this determination.
2. **Indicate whether a Programmatic Agreement exempts the proposed projects from Section 106:**
  - Project is exempted from Section 106.** Provide HUD with the applicable PA or a link to where it can be found online. Provide the specific reference to any applicable sections exempting this project from Section 106 compliance.
  - No PA applies; project is required to complete Section 106 consultation.** Complete step 3 below.

### 3. If Section 106 consultation is required:

- **Determine if tribal consultation is required and submit a recommendation to HUD.** Tribes should be consulted if (a) significant ground disturbance is anticipated (e.g. new sewer lines, utility lines, foundations, footings, grading, access roads) and (b) there is tribe with interest in the project area. Refer to [Appendix A, When to Consult with Tribes](#) to determine whether consultation may be required *and* use the [Tribal Directory Assessment Tool \(TDAT\)](#) to identify tribes that may have an interest in the area where the project is located. Submit to HUD a recommendation as to whether tribal consultation will be necessary that specifies whether ground disturbance is anticipated and whether TDAT indicates interest in the project area. **Note that intermediaries should never contact tribes directly. HUD will consult with tribes as necessary.**

**Determine if historic properties could be impacted and submit a recommendation to HUD.** Historic properties are those that are listed in or eligible for listing in the [National Register of Historic Places \(NRHP\)](#). Generally, a property must be at least 50 years old to qualify, but there are exceptions. Consult the National Register database, existing State Historic Preservation Office (SHPO) and local inventories, local historical and preservation organizations, and local planning departments to identify whether impacted properties are listed in *or eligible for* the National Register. Make a recommendation to HUD about whether historic properties could be impacted and consultation is necessary. An example of a project that may require consultation with the SHPO and consulting parties would be one that impacts historic features on a building on or eligible for the National Register (e.g. replacing windows, adding solar panels to the roof). If historic properties could be impacted, review [Secretary of the Interior's Standards for Rehabilitation & Illustrated Guidelines on Sustainability for Rehabilitating Historic Buildings](#) for guidance on how Pay for Success projects affecting historic buildings can comply with the Secretary's Standards for Rehabilitation.

After completing Part 1, intermediaries should submit form to HUD to complete Part 2.