

Appendix 1.

ENVIRONMENTAL REVIEW RECORD WORKBOOK

Workbook Overview and Quick Guide

All applicants for IHCD HUD-funded development programs are required to fill out the following Environmental Review Record Workbook, including recipients of Home Investment Partnership Program (HOME), Community Development Block Grant (CDBG), National Housing Trust Fund (NHTF), Continuum of Care (CoC), Project Based Voucher (PBV), Lead Hazard Reduction Grant (LHRD), or Healthy Homes Production Grant (HHPG) funding. Based on the level of Environmental Review required, some or all of the workbook exhibits must be completed by the applicant.

See the funding source requirements below, then use the quick guide to determine project activity classification and which exhibits of the workbook are required for application. Further guidance on these items can be found in the ERR and Section 106 User's Guide or by contacting IHCD Placemaking and Environmental Review Manager.

HOME: For projects requesting HOME or a combination of HOME with any other source of funding, follow the guide below to determine the project classification and exhibits required.

CDBG: For projects requesting CDBG, subrecipients will submit only Exhibits A, B, E, and the signature page at time of application (needed for IHCD to complete the Phase 1). As each owner-occupied site is identified during implementation, subrecipients will submit the Single-Site Exhibit G (Appendix 2) provided on the IHCD website for each address (required for the Phase 2). For more guidance on the tiered review process, see User's Guide p. 17-19.

NHTF: For projects requesting only NHTF, complete ERR Workbook Exhibits A, B, G 1-1, 2-1, 2-2, 2-4, 2-5, 3-2, 3-4, and Exhibit H, which outlines specific NHTF requirements.

CoC: For projects only requesting CoC funding, determine the project classification using the HUD CoC Program Environmental Review Flow Chart [here](#). After classification is determined, follow the guide below for required exhibits.

PBV: For projects requesting only Project-based Vouchers, follow the guide below to determine the project classification and exhibits required. For further guidance on PBV funding, see User's Guide p. 9-10.

LHR/HHP: For projects requesting Lead Hazard Reduction or Healthy Homes program dollars, subrecipients will submit only Exhibits A, B, E, and the signature page at time of application (needed for IHCD to complete the Phase 1). As each owner-occupied site is identified during implementation, subrecipients will submit Single-Site Exhibit G (Appendix 2) provided on the IHCD website for each address (required for the Phase 2). For more guidance on the tiered review process, see User's Guide p. 17-19.

Workbook Sections

Updated June 2023

Environmental Review Workbook
Page 1

Exhibit A

Summary Page: Project Description

All applicants must fill out Exhibit A—summary page and project description. This includes site information, project scope, total development cost, IHCD funding amount, source of funds, and project classification.

Project classifications are as follows:

EXEMPT (E) – Activities that have no physical impact on the environment

Examples: environmental studies, administrative and management activities, purchase of insurance, engineering and design costs, technical assistance and training

CATEGORICALLY EXCLUDED, NOT SUBJECT TO 58.5 (CENST) – Activities that would not alter conditions that require an environmental review

Examples: tenant-based rental assistance, homeowner closing costs or down payment assistance, housing pre-development costs that do not have any physical impact

CATEGORICALLY EXCLUDED, SUBJECT TO 58.5 (CEST) – Activities that do not individually or cumulatively have a significant effect on the environment

Examples: replacement or improvement of existing structures when original usage is retained, size or unit density of a structure is not being improved by more than 20%, no change in land use, rehab where total cost is less than 75% of the cost of replacement

ASSESSED (A) – Activities which are not exempt or categorically excluded, and require a full Environmental Assessment

Examples: new construction of five or more residential units, major rehabilitation or reconstruction of five or more units, conversion of non-residential land use to residential

The E, CENST, CEST, and A classification for a project will guide the rest of the use of this workbook. For further examples, please see ERR User's Guide, page 13-14.

Exhibit B

Environmental Review Record Checklist

All applicants must fill out Exhibit B—the ERR Checklist. Check boxes for all exhibits filled out and all documents included.

Exhibit C

Certification of Exemption for HUD funded projects

Only fill out Exhibit C if the project activity is categorized as E, Exempt. Check the box/boxes that describe the included activity, then sign exhibit and Signature Page (p. 12). Skip down to Exhibit G and fill out Part 1: Requirements for all HUD-Assisted Projects. No further approval from HUD is needed for the drawdown of funds.

Exempt activities must have Exhibit A, B, C, G Part 1, and signature page completed in the ERR Workbook.

Exhibit D

Certification of Categorical Exclusion (not subject to 58.5)

Only fill out Exhibit D if the project activity is categorized as CENST, Categorically Excluded, Not Subject to 58.5. Check the box/boxes that describe the included activity, then sign exhibit and Signature Page (p. 12). Skip down to Exhibit G and fill out Part 1: Requirements for all HUD-Assisted Projects. No further approval from HUD is needed for the drawdown of funds.

CENST activities must have Exhibit A, B, D, G Part 1, and signature page completed in the ERR Workbook.

Exhibit E

Certification of Categorical Exclusion (subject to 58.5)

Only fill out Exhibit E if the project activity is categorized as CEST, Categorically Excluded, Subject to 58.5. Check the box/boxes that describe the included activity, then sign. Continue to Exhibit F and G and fill out these portions of the workbook, excluding Exhibit G, Part 4. Include any supporting documentation requested in the workbook with your application.

CEST activities must have Exhibit A, B, E, F, G Part 1-3, and signature page completed in the ERR Workbook.

Upon approval for IHCD funding, CEST-level projects will undergo a third-party review of all submitted documents, submission of public notice and comment period, and HUD Request for Release of Funds.

Exhibit F

Contact Sheet

Only fill out Exhibit F if the project activity is categorized as CEST or Assessed. Fill out all applicable lines to indicate supporting documentation that is required for project as determined in Exhibit G, Parts 2-4.

THE SIGNATURE PAGE FOLLOWING EXHIBIT F MUST BE COMPLETED BY ALL APPLICANTS.

Exhibit G

Environmental Review Workbook

**For assistance in obtaining required source documentation, see Appendix 3 Resources document on IHCD website.*

Part 1 Requirements for ALL HUD-Assisted Projects

All applicants are required to fill out Exhibit G, Part 1. Fill out all sections and provide the following source documentation as a reference for your findings:

- ☐ FEMA flood map
- ☐ Map showing the project(s) in relation to all civil and military airports.

Part 2 General Compliance Factors

Only fill out Exhibit G, Part 2 if the project activity is categorized as CEST or Assessed. Fill out all sections and provide the following source documentation as a reference to your findings:

- ☐ Zoning map with project(s) identified or a zoning letter from the applicable local unit of government
- ☐ Letter from IDNR Lake Michigan Coastal Program (if applicable)
- ☐ EPA or Architectural Plans (if applicable)
- ☐ Farmland map
- ☐ Site aerial and cardinal direction photos and Endangered Species List, as well as documentation from US Fish and Wildlife (if applicable)
- ☐ Wild and Scenic Rivers Map
- ☐ Environmental Justice Map and narrative (if applicable)

Part 3 Site Specific Compliance Factors

Only fill out Exhibit G, Part 3 if the project activity is categorized as CEST or Assessed. Fill out all sections and provide the following source documentation as a reference to your findings:

- ☐ Map showing the project(s) in relation to relevant roads, railroads, or airports with marked distances, as well as aerial photos and topographic maps. Include HUD Noise Abatement and Control worksheet (if applicable)
- ☐ Map showing project(s) in relation to explosive and fire hazards, as well as Acceptable Separation Distance worksheet and supporting documents (if any applicable)
- ☐ Indiana Nonattainment Map
- ☐ EPA documentation of hazardous waste (if applicable)
- ☐ Wetlands Map
- ☐ Historic properties APE map and supporting photos
- ☐ Applicable supporting Section 106 documents, including SHAARD reports, survey numbers, and historical research (if applicable)
- ☐ Scope of work, project drawings and renderings, etc (if applicable for Section 106)
- ☐ Consulting party letters and communication (if applicable for Section 106)
- ☐ Tribal consultation letter draft (if applicable for Section 106)

Part 4 Environmental Assessment

Only fill out Exhibit G, Part 4 if the project activity is categorized as Assessed. Fill out all sections and provide the following source documentation as a reference to your findings:

- ☐ Photos of unique natural features (if applicable)
- ☐ Photos of concern for site suitability (if applicable)
- ☐ Photos of surrounding sites (if applicable)
- ☐ Indiana Geological Survey correspondence and applicable soil surveys or studies, 79(g) report/analysis, and additional communication with agency, municipality, or jurisdiction regarding soil stability (if applicable)
- ☐ Photos of nuisances (if applicable)
- ☐ Letter from appropriate authority if a non-municipal water supply or wastewater system will be used and has been approved (if applicable)

Assessed activities must complete all exhibits of the ERR Workbook, with the exception of Exhibit C, D, E, and H.

Upon approval for IHCD funds, Assessed-level projects will undergo a third-party review of all submitted documents, submission of public notice and comment period, and HUD Request for Release of Funds

Exhibit H

National Housing Trust Fund Only Projects

The Environmental Requirements for new construction and rehabilitation for Housing Trust Fund (HTF) projects under the Property Standards at 24 CFR § 93.301(f)(1) and (2) are similar to Part 50 and 58 Requirements for other HUD-funded projects, but there are some differences. Projects requesting only HTF funding should fill out Exhibit H to ensure all requirements are met.

Part I HTF Environmental Provisions Consistent with 24 CFR Parts 50 and 58

Fill out table to indicate applicable sections of Exhibit G which have been completed in ERR Workbook, as follows:

- ☐ Exhibit G 1-1
- ☐ Exhibit G 2-1
- ☐ Exhibit G 2-2
- ☐ Exhibit G 2-4
- ☐ Exhibit G 2-5
- ☐ Exhibit G 3-2
- ☐ Exhibit G 3-4

Part II Additional HTF Provisions

Fill out all sections and provide the following source documentation as a reference to your findings:

- ☐ Color map showing project location and proximity to civil and military airports
- ☐ Architectural plans or product specs that show lead-free pipes, solder, and flux
- ☐ Agricultural land documentation, census map, other maps (as applicable)
- ☐ Aerial map showing project location and proximity to relevant roads, railroads, or airports and aerial photos.
- ☐ Topographic maps, HUD Noise Abatement and Control Worksheet, as applicable
- ☐ Indiana Nonattainment Map and relevant maps and materials, if applicable
- ☐ IDEM letter, if applicable
- ☐ Phase I ESA
- ☐ Map identifying project location and proximity to any potentially toxic or radioactive sites, if applicable
- ☐ EPA or State Agency letter, if applicable
- ☐ DNR Indiana Historic Buildings, Bridges, and Cemeteries map and SHAARD reports, if applicable.
- ☐ Secretary of Interior's Standards for Rehab and New Construction compliance, if applicable.

National Housing Trust Fund only projects must complete Exhibits A, B, G 1-1, 2-1, 2-2, 2-4, 2-5, 3-2, 3-4, H, and signature page.

Exhibit A

SUMMARY PAGE: PROJECT DESCRIPTION

IHCDA Application or Award Number:	#
Submission status (check only one):	Is this a new submission? <input type="checkbox"/> Is this a revised submission? <input type="checkbox"/>
Applicant or Recipient Name:	
Development Name:	
Development Location:	Address (If no physical address exists yet, approximate with cardinal directions from the nearest address): City/Town: County:
Project Activities (check all that apply):	New Construction: <input type="checkbox"/> (new construction (except HTF only) will be required to undergo an archaeology review at Indiana SHPO that will take a minimum 30-days) Rehabilitation: <input type="checkbox"/> Adaptive Reuse: <input type="checkbox"/>
Project Need:	Describe what is being done, why it is necessary, trends if the project doesn't occur:
Project Description:	What is the total scope of the project? This includes scope for ALL sources of funds. What is the size of the project (square feet, number of total units, and number of IHCDA-assisted units)? What is the anticipated timeline for implementation?
Estimated Total Development Cost (include all sources, committed and anticipated):	\$
Amount of IHCDA Funding:	\$
Development Representative:	Name: Company: Job Title/Role in Development Process: Telephone Number: Email Address:
If ERR preparer is different from above, provide contact information:	Name: Company: Job Title/Role in Development Process: Telephone Number: Email Address:
Project Tiering (check only one):	<input type="checkbox"/> Single Site Project (project is not tiered) <input type="checkbox"/> Scattered Site Overview (OOR, LHRD, or HHPG tiered project, phase 1) Note: Specific Scattered Site Addresses for OOR, LHRD, and HHPG will use Appendix 2. Exhibit G

Source of Funds:	
<input type="checkbox"/>	Community Development Block Grant (CDBG)
<input type="checkbox"/>	HOME Investment Partnerships Program (HOME)
<input type="checkbox"/>	Project Based Vouchers (PBV)
<input type="checkbox"/>	National Housing Trust Fund (NHTF)
<input type="checkbox"/>	Continuum of Care (CoC)

<input type="checkbox"/>	Lead Hazard Reduction Demonstration Grant Program (LHRD)
<input type="checkbox"/>	Healthy Homes Production Grant (HHPG)

Chief Executive Officer of the Recipient	
The CEO of the Recipient is responsible for ensuring that the environmental review process has been carried out according to all applicable requirements. If a LUG, the CEO is also the Responsible Entity for making the Finding below. For other recipients, IHCD is the Responsible Entity for the finding below. In all cases, IHCD is the Certifying Officer to request ROF from HUD.	

Project Classification:	
<input type="checkbox"/>	Exempt Activity
<input type="checkbox"/>	Categorically Excluded Activity (Not Subject to 58.5)
<input type="checkbox"/>	Categorically Excluded Activity (Subject to 58.5)
<input type="checkbox"/>	Assessed Activity
If Assessed:	
<input type="checkbox"/>	Finding of No Significant Impact (Development will not result in a significant impact on the quality of the human environment.)
<input type="checkbox"/>	Finding of Significant Impact (The development may significantly affect the quality of the human environment and may require an Environmental Impact Statement.)
<input type="checkbox"/>	National Housing Trust Fund Only (Not subject to requirements of 58.5 – must fill out and fulfill requirements outlined in Exhibit H)

PDF signatures are now required. If project is funded, IHCD will request original signatures.

Preparer Signature:		Date:	
Title/Agency:			

Green 3 Reviewer Signature:		Date:	
Title/Agency:			

IHCD Staff Approving ER Record Signature:		Date:	
Title/Agency:			

Exhibit B

ENVIRONMENTAL REVIEW RECORD CHECKLIST

Exhibit		Yes	N/A
A	Summary Page with signatures	<input type="checkbox"/>	
C	Certification of Exemption	<input type="checkbox"/>	<input type="checkbox"/>
D	Certification of Categorical Exclusion (Not Subject to 58.5)	<input type="checkbox"/>	<input type="checkbox"/>
E	Certification of Categorical Exclusion (Subject to 58.5)	<input type="checkbox"/>	<input type="checkbox"/>
F	Contact Sheet	<input type="checkbox"/>	
G	Environmental Review Workbook	<input type="checkbox"/>	
	Copy of correspondence with all applicable agencies sent & received	<input type="checkbox"/>	<input type="checkbox"/>
	Comment request letters and responses	<input type="checkbox"/>	<input type="checkbox"/>
	Section 106 Determination of Effect Letter (LUG only)	<input type="checkbox"/>	<input type="checkbox"/>
	Maps, photos, and other source documentation (reference Exhibit 3 and the ERR Workbook for required source documentation)	<input type="checkbox"/>	<input type="checkbox"/>
	Included any specs or site plans, if applicable	<input type="checkbox"/>	<input type="checkbox"/>
H	National Housing Trust Fund Only Requirements	<input type="checkbox"/>	<input type="checkbox"/>

Exhibit C
Certification of Exemption for HUD funded projects
Determination of activities not subject to 24 CFR 58.34(a)
 May be subject to provisions of Sec 58.6, as applicable

IHCDA Application/Award # _____
 Project Name: _____
 Project Description: _____
 Project Address: _____
 Total Development Cost: _____
 IHCDA Funding Amount: _____

I hereby certify that the abovementioned project has been reviewed and determined an Exempt activity per 24 CFR 58.34(a) as follows:

<input type="checkbox"/>	1. Environmental and other studies, resource identification and the development of plans and strategies;
<input type="checkbox"/>	2. Information and financial services;
<input type="checkbox"/>	3. Administrative and management activities;
<input type="checkbox"/>	4. Public services that will not have a physical impact or result in any physical changes, including but not limited to services concerned with employment, crime prevention, child care, health, drug abuse, education, counseling, energy conservation and welfare or recreational needs;
<input type="checkbox"/>	5. Inspections and testing of properties for hazards or defects;
<input type="checkbox"/>	6. Purchase of insurance;
<input type="checkbox"/>	7. Purchase of tools;
<input type="checkbox"/>	8. Engineering or design costs;
<input type="checkbox"/>	9. Technical assistance and training;
<input type="checkbox"/>	10. Assistance for temporary or permanent improvements that do not alter environmental conditions and are limited to protection, repair, or restoration activities necessary only to control or arrest the effects from disasters or imminent threats to public safety including those resulting from physical deterioration;
<input type="checkbox"/>	11. Payment of principal and interest on loans made or obligations guaranteed by HUD;
<input type="checkbox"/>	12. Any of the categorical exclusions listed in Sec. 58.35(a) provided that there are no circumstances that require compliance with any other Federal laws and authorities cited in Sec. 58.5.

If your project falls into any of the above categories, you do not have to submit a Request for Release of Funds (RROF), and no further approval from HUD will be needed by the recipient for the draw-down of funds to carry out exempt activities and projects. However, the responsible entity must still document in writing its compliance with and/or applicability with 24CFR58.6 by completing **Exhibit G, Part 1: Requirements for all HUD-Assisted Projects**.

By signing below the Responsible Entity certifies in writing that each activity or project is exempt and meets the conditions specified for such exemption under section 24 CFR 58.34(a). Please keep a copy of this determination in your project files.

Application Preparer (please print) Date

CEO of the Recipient (If a LUG, this is the Responsible Entity) Date

IHCDA Staff Approving Signature Date
 (Responsible Entity for NFP & FP entities, and Certifying Official for all projects.)

Exhibit D
Certification of Categorical Exclusion (not subject to 58.5)
Determination of activities not subject to 24 CFR 58.34(a)
May be subject to provisions of Sec 58.6, as applicable

Application/Award # _____
Project Name: _____
Project Description: _____
Project Address: _____
Funding Amount: _____
Grant Number: _____

I hereby certify that the abovementioned project has been reviewed and determined an Exempt activity per 24 CFR 58.34(a) as follows:

<input type="checkbox"/>	1. Tenant-based rental assistance;
<input type="checkbox"/>	2. Supportive services including, but not limited to, health care, housing services, permanent housing placement, day care, nutritional services, short-term payments for rent/mortgage/utility costs, and assistance in gaining access to local, State, and Federal government benefits and services;
<input type="checkbox"/>	3. Operating costs including maintenance, security, operation, utilities, furnishings, equipment, supplies, staff training and recruitment and other incidental costs;
<input type="checkbox"/>	4. Economic development activities, including but not limited to, equipment purchases, inventory financing, interest subsidy, operating expenses and similar costs not associated with construction or expansion of existing operations;
<input type="checkbox"/>	5. Activities to assist homebuyers to purchase existing dwelling units or dwelling units under construction, including closing costs and down payment assistance, interest buy downs, and similar activities that result in transfer of title;
<input type="checkbox"/>	6. Affordable housing pre-development costs including legal, consulting, developer and other costs related to obtaining site options, project financing, administrative costs and fees for loan commitments, zoning approvals, and other related activities which do not have a physical impact;
<input type="checkbox"/>	7. Approval of supplemental assistance (including insurance or guarantees) to a project previously approved under this part, if the approval is made by the same responsible entity that conducted the environmental review on the original project and re-evaluation of the environmental findings is not required under Sec. 58.47.

If your project falls into any of the above categories, you do not have to submit a Request for Release of Funds (RROF), and no further approval from HUD is needed for the draw-down of funds. However, the responsible entity must still document in writing its compliance with and/or applicability with 24CFR58.6 by completing **Exhibit G, Part 1: Requirements for all HUD-Assisted Projects**.

By signing below the Responsible Entity certifies in writing that each activity or project is Categorically Excluded (not subject to 58.5) and meets the conditions specified for such exemption under section 24 CFR 58.35(b). Please keep a copy of this determination in your project files.

Application Preparer (please print) Date

CEO of the Recipient (If a LUG, this is the Responsible Entity) Date

IHCDA Staff Approving Signature Date
(Responsible Entity for NFP & FP entities, and Certifying Official for all projects.)

Exhibit E
Certification of Categorical Exclusion (subject to 58.5)
Determination of activities per 24 CFR 58.35(a)
 May be subject to provisions of Sec 58.6, as applicable

Application/Award # _____
 Project Name: _____
 Project Description: _____
 Project Address: _____
 Funding Amount: _____

I hereby certify that the abovementioned project has been reviewed and determined to be a Categorical Excluded activity (subject to 58.5) per 24 CFR 58.35(a) as follows:

<input type="checkbox"/>	1. Acquisition, repair, improvement, reconstruction, or rehabilitation of public facilities and improvements (other than buildings) when the facilities and improvements are in place and will be retained in the same use without change in size or capacity of more than 20 percent (e.g., replacement of water or sewer lines, reconstruction of curbs and sidewalks, repaving of streets);
<input type="checkbox"/>	2. Special projects directed to the removal of material and architectural barriers that restrict the mobility of and accessibility to elderly and handicapped persons;
<input type="checkbox"/>	3. Rehabilitation of buildings and improvements when the following conditions are met: i. In the case of multifamily residential buildings: A. Unit density is not changed more than 20 percent; B. The project does not involve changes in land use from residential to non-residential; and C. The estimated cost of rehabilitation is less than 75 percent of the total estimated cost of replacement after rehabilitation. ii. In the case of non-residential structures, including commercial, industrial, and public buildings: A. The facilities and improvements are in place and will not be changed in size or capacity by more than 20 percent; and B. The activity does not involve a change in land use, such as from non-residential to residential, commercial to industrial, or from one industrial use to another.
<input type="checkbox"/>	4. An individual action 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;
<input type="checkbox"/>	5. Acquisition or disposition of an existing structure or acquisition of vacant land provided that the structure or land acquired or disposed of will be retained for the same use;
	6. Combinations of the above activities, please check all applicable boxes above

The responsible entity must also complete and attach the **Environmental Review Worksheet**. By signing below the Responsible Entity certifies in writing that each activity or project is Categorical Excluded (subject to 58.5) and meets the conditions specified for such exemption under section 24 CFR 58.35(a). Please keep a copy of this determination in your project files.

Application Preparer (please print) Date

CEO of the Recipient (If a LUG, this is the Responsible Entity) Date

IHCDA Staff Approving Signature Date
 (Responsible Entity for NFP & FP entities, and Certifying Official for all projects.)

Exhibit F

CONTACT SHEET

Application/Award# _____
 Recipient Name: _____
 Development Location: _____

NOTE: Not all agencies may be applicable to your particular project. Please complete Exhibit G, the Environmental Review Workbook, to determine which agencies you need to contact. Then complete this form to assist you in your tracking.

Applicable Section of Exhibit G, Environmental Review Worksheet	Agency	Applicable ? (Y/N)	Date Sent	Date Received	Attached? (Y/N)
2-1-1	Local Unit of Government - Zoning				
2-1-2	IN-DNR – Lake Michigan Coastal Program				
2-1-3	Indiana Department of Environmental Management (IDEM)				
2-2	U.S. Environmental Protection Agency				
2-3	USDA - Natural Resources Conservation Service				
2-5	IN-DNR – Water				
3-4-1	IDEM – Office of Air Quality				
3-5-2	IN-DNR – Fish and Wildlife				
3-6-4	Indian Tribes				
4-4	Indiana Geological Survey				
4-4	Local Soil and Water Conservation District				
	Other:				
	Other:				
	Other:				
	Other:				
	Other:				
	Other:				

IHCDA Application/Award #
Project Name:
Project Description:
Project Address:
Total Development Cost:
IHCDA Funding Amount:

FINDINGS

Must be completed for both Categorically Excluded (Subject to 58.5) and Assessed Projects.

1. Summary of Environmental Conditions:

2. Summary of Findings and Conclusions:

3. Conditions and Requirements

Are mitigation measures required?

☐ Yes ☐ No

If YES, list and describe:

4. Project Modifications and Alternatives Considered:

5. Summary of additional studies performed, if any (attach studies):

SIGNATURES

Must be completed for all projects.

1. Is project in compliance with applicable laws and regulations?

2. Is an Environmental Impact Statement Required?

3. Can a Finding of No Significant Impact (FONSI) be made? Project will not significantly affect the quality of the human environment.

Prepared by (please print):

Title:

Signature of preparer:

Date

Exhibit G

Environmental Review Workbook

PART I. Requirements for ALL HUD-Assisted Projects, Including Exempt and Categorically Excluded [24 CFR 58.6]

Property Address:

1-1. The Flood Disaster Protection Act of 1973 & National Flood Insurance Reform Act of 1994

Is the project located within a Special Flood Hazard Area (any variation of Zone A) as designated on a current FEMA flood map?

Yes No N/A

Identify FEMA flood map used to make this finding:

- Community Name and Number:
- Map Panel Number and Date of Map Panel:
- If no FEMA flood map has been published for project area, provide documentation from an engineer or local flood control agency demonstrating whether or not project site is in a 100-year flood plain.

Projects with any portion of the site in a 100-year flood plain (areas designated as any variation of a Zone A) will NOT be eligible for IHADA funding assistance.

Is there any shaded Zone X on the project site?

Yes No N/A

If yes, include in your project scope the following design features:

- Flood minimization techniques like permeable surfaces, storm water capture and reuse, and/or green roofs.
- New construction and substantial improvement projects must be elevated at or above the 100-year floodplain.
- The inclusion of early warning systems and emergency evacuation plans.

Comments:

Source Documentation: (1) Attach a color copy of the appropriate section of the FEMA flood map. Find your flood map on FEMA's website [here or here](#). (2) Identify your project location on the map. (3) If no FEMA map is available, attach a letter or other documentation from an engineer or local flood control agency. (4) If applicable, indicate the flood mitigation design features in the comments section above and in the plans and specs. (5) If applicable, attach proof of flood insurance protection.

Additional resource for finding flood determinations is from the Indiana Department of Natural Resources [Indiana Floodplain Information Portal](#)

1-2. Airport Hazards

[24 CFR 51, Subpart D](#) promotes compatible land use around airports and requires analysis of the siting of HUD-funded activities within close proximity to certain airports and military airfields.

Is the project within 2,500 feet from the end of a runway at a civil airport or within 15,000 feet from the end of a runway at a military airport?

☐ Yes ☐ No

If YES, comply with 24 CFR Part 51, Subpart D.

Comments:

Source Documentation: (1) Attach a color map showing the project location and the locations of any civil airports or military airfields, along with their approximate distance from the project site. (2) If project site is in APZ or RPZ/CZ please contact the IHCD A Placemaking and Environmental Review Manager for further instructions. (3) If applicable, document compliance with 24 CFR 51 Subpart D.

If the project is “Exempt” or “Categorically Excluded, Not Subject to 58.5” stop here.

If the project is “Categorically Excluded, Subject to 58.5” or “Assessed” continue to Part 2.

Part 2. General Compliance Factors

2-1. Compliance with Applicable Plans

2-1-1. Is the project in compliance or conformance with local zoning?

☐ Yes ☐ No ☐ Not Applicable

Source Documentation:

- If YES, attach a zoning map that includes a key explaining the zoning classifications and with the project location(s) identified. In lieu of the map, you may submit a letter from the Local Unit of Government that identifies the project address, the applicable zoning and that the proposed use is allowable. If the sites have not yet been identified, then the letter or map should denote the area(s) in which you expect the project site(s) to be located.
- If NO, attach a detailed description of the process you are going through to bring the project into zoning compliance and when you expect it to be completed.
- If N/A, explain:

2-1-2. Is the project located within a Coastal Zone Management (CZM) area? See [Lake Michigan Coastal Program Area](#).

☐ Yes ☐ No

If YES, the [Indiana Department of Natural Resources, Lake Michigan Coastal Program](#) must make a finding that the project is consistent with the approved State CZM program.

Comments:

Source Documentation: If YES, attach a letter from the IDNR, Lake Michigan Coastal Program.

2-1-3. Have you obtained an [Environmental Review letter from the Indiana Department of Environmental Management](#)?

This is not required but is recommended as a best practice to identify any applicable plans, such as Air Quality State Implementation Plans (SIPs) or Water Quality Management Plans, as well as other potential environmental issues.

☐ Yes ☐ No

Source Documentation: Attach a copy of the letter from IDEM.

Are there any unresolved conflicts concerning the use of the site?

☐ Yes ☐ No

If YES, explain.

2-2. Sole Source Aquifers

The Safe Drinking Water Act of 1974 requires protection of drinking water systems that are the sole or principal drinking water source for an area and which, if contaminated, would create a significant hazard to public health.

2-2-1. Sole Source Aquifers. For all projects, is the proposed project located in Elkhart, Kosciusko, Noble, St. Joseph, or LaGrange County?

☐ Yes ☐ No

If YES, compliance is required with Section 1424(e) of the Safe Drinking Water Act, which mandates consultation with [Region V of the Environmental Protection Agency](#).

Comments:

Source Documentation: If applicable attach: A letter from the EPA.

2-3. Farmland Protection

The aim of the Farmland Protection Policy Act (FPPA) (7 U.S.C. 4201 et seq, implementing regulations 7 CFR Part 658, of the Agriculture and Food Act of 1981, as amended) is to minimize the effect of federal programs on the unnecessary and irreversible conversion of farmland to nonagricultural uses. Farmland subject to FPPA requirements does not have to be currently used for cropland. The project must meet a FPPA exemption or must take the steps necessary to be in compliance with the FPPA.

Does your project include new construction, acquisition of undeveloped land, or conversion of land use that could potentially convert agriculture land to a non-agricultural use?

☐ Yes ☐ No

If YES, continue to next question. If NO, explain how you determined that agricultural land would not be converted. Provide any documentation to support your answer. You are finished with this section.

If YES, is the project land designated as "urbanized" on the Census Bureau map? Create and submit the map to support your answer. You are finished with this section. If NO, continue to the next question.

☐ Yes ☐ No

Is "important farmland" on the project site? Important farmland includes prime farmland, unique farmland, or farmland of statewide or local importance regulated under the FPPA. Refer to Appendix 3 to determine "important farmland."

☐ Yes ☐ No

If NO, include maps and other documentation that proves no "important farmland" is on site. You are finished with this section.

If YES, does your project meet one of the following exemptions?

- Construction limited to on-farm structures needed for farm operations ☐ Yes ☐ No
- Construction limited to new minor secondary (accessory) structures such as a garage or storage shed ☐ Yes ☐ No
- Project on land used for water storage ☐ Yes ☐ No
- Project on land used for water storage ☐ Yes ☐ No
- Project on land already in or committed to urban development ([7 CFR 658.2\(a\)](#)) ☐ Yes ☐ No

If YES and the project does not meet an exemption, then you must consider alternatives and mitigation steps might be allowed. Complete form [AD-1006](#). Please refer to the Appendix 3 Resources page for more information.

Comments:

Source Documentation: (1) If applicable, attach any documentation to show that your project is not converting agricultural land to another use. (2) For land already committed to urban development, provide the census map (see Appendix 3, Resources). (3) If project has "important farmland" provide any forms submitted to Natural Resources Conservation Services (NRCS). Provide all communications with NRCS and the applicable portions of the AD-1006 form. Provide any maps and supporting documentation showing pertaining to "important farmland." (4) If the project meets one of the exemptions, attach evidence. (5) If applicable, attach documentation outlining proposed mitigation strategies.

2-4. Endangered Species

The environmental review must consider potential impacts of the HUD-assisted project to endangered and threatened species and critical habitats. The review must evaluate potential impacts not only to any listed but also to any proposed endangered or threatened species and critical habitats. This responsibility is cited in environmental procedures at [24 CFR 58.5\(e\)](#) and [24 CFR 50.4 \(e\)](#).

Before answering the following questions, please visit the project site and obtain lists of protected species from the [Indiana's Department of Natural Resources list of Endangered, Threatened and Rare Species by County](#) and the [U.S. Fish and Wildlife Services' Endangered Species](#).

Is the project the type that could affect listed species or critical habitat?

☐ Yes ☐ No

Is the project likely to affect any of the listed species or critical habitat?

☐ Yes ☐ No

Will the project cause the destruction of trees or other vegetation that serves as animal habitat?

☐ Yes ☐ No

Will the project increase run-off into nearby water bodies that serve as animal habitat?

☐ Yes ☐ No

Will the project increase air emissions that might affect animal habitat?

☐ Yes ☐ No

Do you determine that the project will have "No Effect" on listed species or critical habitat?

☐ Yes ☐ No

Do you determine that the project "May Affect" but is not likely to adversely affect listed species or critical habitat?

☐ Yes ☐ No

Do you determine that the project will "Likely Adversely Affect" listed species or critical habitat?

☐ Yes ☐ No

If the project "May Affect" or will "Likely Adversely Affect" listed species, then compliance is required with Section 7 of the Endangered Species Act, which mandates consultation with the [US Department of the Interior, Fish and Wildlife Service](#).

Comments:

Date of the site inspection: Name of the person who did the site inspection:

Date of initial consultation with US FWS:

Source Documentation: (1) Provide aerial photos of the site with the site labeled. (2) Provide photos of the site. (3) Provide PDF lists from both the IDNR Endangered Species by County and the US FWS Endangered Species lists. (4) If endangered species or critical habitats are likely to be or will be affected, attach all documentation and communications showing consultation with US Fish and Wildlife Service and any other agencies with the determinations and final decisions clearly marked.

2-5. Wild and Scenic Rivers

The [Wild and Scenic Rivers Act \(16 U.S.C. 1271-1287\)](#) provides federal protection for certain free-flowing, wild, scenic, and recreational rivers designated as components or potential components of the National Wild and Scenic Rivers System (NWSRS).

2-5-1. Wild and Scenic Rivers. While the State of Indiana does not contain any Wild or Scenic Rivers, we must still submit supporting documentation proving this.

2-5-2. River Segments. Identify if the project site is part of a river segment that potentially qualifies as national wild, scenic, or a recreational river.

If YES, is your project a water resources project? ☐ Yes ☐ No

If YES, could your project do any of the following:

- Have a direct and adverse effect within wild and scenic river boundaries?
- Invade the area or unreasonably diminish the river outside wild and scenic river boundaries?
- Have an adverse effect on the natural, cultural, and/or recreational values of an NRI segment?

If YES to any of the above, then stop and consult IHCD.

Source Documentation: (1) Include a PDF page from the National Wild and Scenic Rivers System website showing there are no Wild or Scenic Rivers in Indiana. (2) Include a PDF page from the Nationwide Rivers Inventory website to

show River Segments search. (3) Show evidence of communications and/or consultation and permit documentation, if applicable, with other agencies or authorities.

2-6. Environmental Justice ([E.O. 12898, Federal Actions to Address Environmental Justice](#))

Environmental Justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Fair treatment means that no group of people, including a racial, ethnic, or a socioeconomic group, should bear a disproportionate share of the negative environmental consequences resulting from development activities. Meaningful involvement means that: (1) potentially affected community residents have an appropriate opportunity to participate in decisions about a proposed activity that will affect their environment and/or health; (2) the public's contribution can influence the regulatory agency's decision; (3) the concerns of all participants involved will be considered in the decision making process; and (4) the decision makers seek out and facilitate the involvement of those potentially affected.

2-6-1. Identification of Minority and Low Income Neighborhoods. To identify if the project is in a Potential Areas of Concern for environmental justice, review the EPA's Environmental Justice Screening and Mapping tool website: <https://www.epa.gov/ejscreen>

Is the project located in a predominantly minority or low-income neighborhood?

☐ Yes ☐ No

If NO, proceed to next section.

If YES, proceed to question 2-6-2.

2-6-2. Effect of Neighborhood on Project. To identify if the project is in a neighborhood that neighborhood suffer from disproportionately adverse environmental effects on minority and low-income populations relative to the community-at-large, consider the responses to question 3-4, EPA Mapped Items. Also see Chapter 4 of the User Guide, Resources for Environmental Review.

Does the site or neighborhood suffer from disproportionately adverse environmental effects on minority and low-income populations relative to the community-at-large?

☐ Yes ☐ No

If YES, you must make efforts made to mitigate the adverse impact of nearby environmental impacts on the proposed project and involve the neighborhood in decision-making regarding the project.

2-6-3. Effect of Project on Neighborhood.

Will the proposed project have an adverse environmental impact on the project site or neighborhood that disproportionately affects minority and low-income populations relative to the community-at-large?

☐ Yes ☐ No

If YES, you must make efforts made to mitigate the adverse impact of the proposed project on the neighborhood and involve the neighborhood in decision-making regarding the project.

Comments:

continues on next page

Source Documentation: If YES to questions number 2-6-2 or 2-6-3 above, provide documentation of (1) why you answered YES to the question(s), (2) efforts made to mitigate the adverse impact of the neighborhood on the project, or the project on the neighborhood, and (3) efforts to involve the neighborhood residents and proposed residents in decision-making regarding the project.

All additional questions in the Environmental Review are site specific. If this is a Single Site project, or a specific site within a Scattered Site Project, please continue. If this is a Scattered Site Project and specific sites have not yet been identified, please go to Part 6, Signature Page.

Note: Projects involving contiguous lots or the subdivision of a single piece of property into separate lots for development will be considered Single Site Projects for the purposes of completing this form.

All applicants for projects that are “Categorically Excluded, Subject to 58.5” or “Assessed” must answer Part 3 of the ERR.

Part 3. Site Specific Compliance Factors

3-1. Noise Abatement and Control

HUD’s noise standards are found at [24 CFR Part 51, Subpart B](#). The regulations protect new construction and rehabilitation residential properties from excessive noise exposure. HUD encourages mitigation to noise as appropriate.

Normal accepted ranges for noise is less than 65 dB. Some mitigation may be allowed for noise levels between 65 dB and 75 dB.

Is the project new construction or rehabilitation of a residential structure?

☐ Yes ☐ No

Is the project located near any of the following major noise sources?

Civilian or military airports (within 15 miles) ☐ Yes ☐ No

Major roads with greater than 10,000 Average Daily Trips (ADT) (within 1,000 feet)? ☐ Yes ☐ No

Railroad (within 3,000 feet)? ☐ Yes ☐ No

If NO, submit the appropriate source documentation proving this and you are finished with this section.

If YES and the project is new construction, comply with 24 CFR 51, Subpart B. Refer to IHCDCA Appendix 3 for making maps. Use adopted DNL contours if the noise source is an airport.

If YES and the project is rehab of an existing structure, you must have noise attenuation measures incorporated into your project design and specs. Explain the noise attenuation measures:

If YES and the project contains balconies, other development standards may apply. Stop and contact IHCDCA immediately.

Comments:

Source Documentation: (1) Attach a map showing the project location and the locations of any relevant roads, railroads, or airports, along with their approximate distance from the project site. (2) Attach aerial photos. (3) Attach topographic maps that show elevation contours. (4) If applicable, attach a copy of the applicable HUD Noise Abatement and Control worksheets [here](#) and/or IHCDCA Appendix 10 HUD Airport Noise worksheet. (5) If yes to any of the above and you are doing new construction, comply with 24 CFR 51, Subpart B.

3-2. Explosive and Flammable Operations

HUD requires [Acceptable Separation Distance](#) from explosive and fire hazards.

Are there materials in an above ground storage tank within one mile of the project site? ☐ Yes ☐ No

Do the tanks contain 100-gallon capacity or more of common liquid industrial fuels? ☐ Yes ☐ No

Are there materials in any type or size container that hold hazardous materials that are not common liquid industrial fuels? ☐ Yes ☐ No

If YES, use [HUD’s Explosive and Flammable Facilities page](#) and comply with [24 CFR Part 51, Subpart C](#).

Comments:

Source Documentation: If YES, provide the following: (1) Attach a map showing location of the materials in relation to your project site. (2) Attach the Acceptable Separation Distance worksheets from the HUD Hazards Guide referenced

above. (3) If applicable, attach any communications with local fire department or other local agencies providing information on explosive and flammable materials on or near your project site.

3-3. Environmental Protection

3-3-1. Air Quality

Section 176 (c) of the Clean Air Act requires all federal agencies that permit, fund or approve actions to ensure that actions conform with approved state plans for air quality before the action is approved. This is done at the national and state levels.

Does the project include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units? ☐Yes ☐No

If NO, then skip to section 3-3-2. If YES, answer the next question.

Is the project in a nonattainment area? ☐Yes ☐No

If NO, then skip to section 3-3-2. If YES, answer the next two questions. Provide the National Ambient Air Quality Standard designation, classification and nonattainment status not met:

Determine the estimated emissions levels of your project for each of the criteria pollutants that are in the nonattainment status on your project area. Will your project exceed the *de minimis* or threshold emission levels? ☐Yes ☐No

If YES, contact IDEM for comment.

Comments:

Source Documentation: (1) Attach the Indiana Nonattainment Map. (2) If applicable, print off relevant maps or materials and attach. (3) If applicable, attach letter requesting comment from IDEM and IDEM's comment letter.

3-3-2. Contamination and Toxic Substances

Before answering the following questions, visit and observe the project site.

Is the project near an industry disposing of chemicals or hazardous waste?
☐Yes ☐No

Is the project site a Superfund site or listed on CERCLA?
☐Yes ☐No

Is the site located within 3,000 feet of a toxic or solid waste landfill site or industrial waste disposal site?
☐Yes ☐No

Does the site have an underground storage tank?
☐Yes ☐No

If YES to any of the above questions, you may be required to undertake investigations determined necessary to comply with 24 CFR § 50.3 (i).

Comments:

Date of the site inspection: Name of the person who did the site inspection:

Source Documentation: If YES to any of the above, (1) print off relevant maps or materials from the EPA attach a copy; (2) attach a map identifying the project location and the location of the potential toxic or radioactive concern and showing the distance between them; and (3) attach materials related to the 50.3(i) process.

3-4. Protection of Wetlands – Wetland Identification

[Executive Order 11990](#) requires federal agencies to avoid adverse impacts associated with destruction and modification of wetlands and to avoid new construction in wetlands if there is a practicable alternative.

If your project involves new construction and has either mapped wetlands or potential wetlands, the project is not eligible for IHCD funding. If your project involves site excavation, installation of wells or septic systems, grading, placement of fill, draining, dredging, channelizing, filling, diking, impounding, and any related activities, and has either mapped wetlands or potential wetlands, you must consider project alternatives, including a new site. STOP project work immediately and contact the IHCD Placemaking and Environmental Review Manager for next steps.

Before answering the following questions, visit and observe the project site for wetlands.

Are there drainage ways, streams, rivers, or coastlines on, adjacent, or near the site?

☐Yes ☐No

Are there ponds, marshes, bogs, swamps, or other wetlands on, adjacent, or near the site?

☐Yes ☐No

Does the project site exhibit any wetland characteristics including scrub-shrub, forested areas, wet meadow, shallow marsh, deep marsh or open water?

☐Yes ☐No

Does the site have any potential wetlands, as indicated by the above data collection?

☐Yes ☐No

Create a wetland map of the project site. Is the project located within a mapped wetland designated on a [National Wetland Inventory Map](#) of the Department of Interior?

☐Yes ☐No

Create a [USDA soil survey map](#) to show hydric soils and the potential for wetlands.

Are you aware of any consultation or permits from other agencies or departments with water and/or land oversight?

☐Yes ☐No

If YES, please describe and provide copies of any communications, permit applications, or permits as supporting documentation.

Comments:

Date of the site inspection: Name of the person who did the site inspection:

Source Documentation: (1) Attach NWI and USDA maps with project location identified. (2) Attach site photos of potential wetland areas. (3) Attach consultation and permit documentation, if applicable. (4) If wetlands or potential wetlands are identified on your project site, STOP work and contact the IHCDa Placemaking and Environmental Review Manager.

3-5. Section 106 Historic Properties Review ([16 USC 470f](#), 16 USC 469a-1, EO 11593)

The National Historic Preservation Act of 1966 requires agencies to consider the impact of their projects on historic properties. This process is commonly known as "the Section 106 review". The Section 106 review has its own guiding regulations and is distinct and separate from the environmental review process. Its implementing regulations are at 36 CFR Part 800 but are incorporated by reference into the environmental review process at 24 CFR Parts 58 and 50. Therefore, IHCDa combines the Section 106 review into the environmental review process, as found in the questions below.

As part of the Section 106 Historic Review process, IHCDa is required to submit all new construction projects to the Indiana Department of Natural Resources' State Historic Preservation Office (SHPO) for archaeology review and is required to consult with federally recognized Indian tribes regarding new construction sites. SHPO is statutorily required to complete this review within 30 days and Indian tribes will have the same time period to provide public comment Please plan your project timeline accordingly.

3-5-1. Project Site. Before answering the following questions, visit the project property and/or site and perform historical research on the project property and/or project site.

Attach the following documentation.

- On a legible map clearly outline and label the precise location of the development area, the Area of Potential Effects (APE) and any potential historic properties within the APE.
- Clear, labeled, and color photographs of the project site and surrounding area.

Are there any structures in the APE that are over fifty (50) years old? ☐Yes ☐No

If YES:

- Provide dates of construction:
- Provide information regarding alteration to any structures on the site:

Is the site associated to any significant person or event? ☐Yes ☐No

Is the site associated with any significant person or event? ☐Yes ☐No

If YES, please explain:

Is the project site or any site in the APE a cultural or historic resource according to the [DNR's Indiana Historic Buildings, Bridges, and Cemeteries map or the SHAARD database](#)? ☐Yes ☐No

If YES:

- Provide the name, address, property rating, and survey numbers:
- Attach SHAARD reports for the properties with Notable or Outstanding ratings within the APE.

Are there resources listed on the [National Register of Historic Places](#) within the APE? ☐Yes ☐No

If YES:

- Provide the name, address of site, and National Register File Numbers:
- Attach SHAARD reports for the properties listed on the National Register within the APE.

Date of the site inspection: _____ Name of the person who did the site inspection: _____

Source Documentation: (1) Attach map with site and APE identified. (2) Attach photos of site and surrounding area. (3) Attach SHAARD reports, if applicable. (4) Attach all other historical research.

3-5-2. Explanation of Undertaking

Give a brief but detailed description of the scope of work. Describe all work to the building and to the site. Be specific, concise, and complete:

Did you attach color photos of the site and surrounding area? ☐Yes ☐No

Did you attach project drawings, renderings, building and site plans? If file sizes are too large you can include a thumb drive or contact IHCD to set up a file sharing site. ☐Yes ☐No

Did you attach product specifications? This applies especially if the project is proposing replacing building components. ☐Yes ☐No

Will there be any ground disturbing activities (any digging at all) as part of the undertaking? ☐Yes ☐No

Note: For new construction projects, IHCD will need to send projects to Indiana SHPO for an archaeology review. This will take a minimum of 30 days.

Provide a detailed description of all ground disturbing activities to take place. This includes any digging into the ground.

Provide detailed information of all previous ground disturbance on the site (construction, demolition, grading, utility or infrastructure work, mining, agricultural use):

Source Documentation: (1) Attach scope of work. (2) Attach photos of site and surrounding area. (3) Attach project drawings, renderings, site plans, work plans, product specs, etc.

3-5-3. Non-Tribal Consulting Party Consultation

Pursuant to 36 CFR Part 800.2(a)(4), consulting parties are entitled to be participants in the Section 106 process. 36 CFR Part 800.2(c)(5) states that "certain individuals and organizations with a demonstrated interest in the undertaking may participate as consulting parties due to the nature of their legal and economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties." With this consultation, consulting parties may comment on the identification and evaluation of historic properties, the effects the proposed project may have on historic properties, and any recommendations of how to minimize or mitigate any adverse effects from the proposed project.

The letter should be from the development representative to all potential consulting parties, inviting them to become consulting parties and comment on the proposed project.

Below is a recommended list of consulting parties that includes but is not limited to:

- Representatives of local governments (mayor, town council, etc.)
- Indiana Landmarks (appropriate regional office)
- Local city/county historical societies
- Neighborhood associations/organizations

The letter should include the following:

- Project sponsor/funding source
- Description of the location of the project site
- Description of the proposed project
- Identification and evaluation of historic properties (eligible—means the project site or any of the sites within the area of potential effects (APE) has a Notable or Outstanding rating on IDNR's Indiana Historic Buildings, Bridges, and Cemeteries Map—or is listed on the National Register of Historic Places),
- Determination of effects upon any historic properties
- If applicable, any recommendations for minimization or mitigation of adverse effects
- Enclosures with the letter:
 - An Aerial map, using the IDNR's Indiana Historic Buildings, Bridges, and Cemeteries Map, clearly marking the project area and APE (as described in 3-5-1-A)
 - Clear photographs of the project site and surrounding site (as described in 3-5-1-B)

Date(s) letter(s) sent:

Did you receive any responses from the letters? ☐Yes ☐No

If YES, please describe the responses, resolutions, and attach any additional communications.

Comments:

Source Documentation: (1) Attach the letter and the enclosures that was sent to any consulting parties. (2) Attach any correspondence received from them. (3) Answer questions about the letters and attach any additional communications.

Continues on next page

3-5-4. Determination of Effects

Are there eligible or listed historic properties within the Area of Potential Effects?

☐ Yes

☐ No

If YES, please answer the following:

Will the undertaking alter or diminish the defining characteristics of the historic property as outlined in the Secretary of the Interior's Standards for Treatment of Historic Properties (36 CFR part 68); Standards for Rehabilitation?

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.

☐ Yes ☐ No Please explain:

2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.

☐ Yes ☐ No Please explain:

3. Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.

☐ Yes ☐ No Please explain:

4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.

☐ Yes ☐ No Please explain:

5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.

☐ Yes ☐ No Please explain:

6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.

☐ Yes ☐ No Please explain:

7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.

☐ Yes ☐ No Please explain:

8. Archaeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be taken.

☐ Yes ☐ No Please explain:

Continues on next page

9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and

will be compatible with the historic materials, features, size, scale, and proportion, and massing to protect the integrity of the property and its environment.

☐Yes ☐No Please explain:

10. New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

☐Yes ☐No Please explain:

Apply the Criteria for Adverse Effect as outlined in 36 CFR 800.5(a) on each affected historic property.

- (i) Physical destruction of or damage to all or part of the property;

☐Yes ☐No Please explain:

- (ii) Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary's standards for the treatment of historic properties (36 CFR part 68) and applicable guidelines;

☐Yes ☐No Please explain:

- (iii) Removal of the property from its historic location;

☐Yes ☐No Please explain:

- (iv) Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;

☐Yes ☐No Please explain:

- (v) Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features;

☐Yes ☐No Please explain:

- (vi) Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and

☐Yes ☐No Please explain:

- (vii) Transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

☐Yes ☐No Please explain:

Recommended determination of effect:

- ☐ No historic properties affected
- ☐ No adverse effect
- ☐ Adverse Effect

3-5-5. Tribal Consultation

Local Governments **MUST** answer this question. All other applicants that include new construction in their development **MUST** provide IHCDa with the draft Tribal Consultation letter located in Appendix 14. IHCDa will use this letter to consult with tribes on behalf of the development.

Rehabilitation developments that do not include a LUG as the applicant do not need to answer this question.

Depending on the nature of your project tribal consultation may be required. Section 106 requires consultation with federally recognized Indian tribes when a project might affect a historic property of religious and cultural significance to the tribe. Only the agency official – HUD program staff or the certifying official of the Responsible Entity (IHCDa or a LUG if the LUG is receiving funds from IHCDa) - may initiate tribal consultation. Other parties like consultants, PHAs, lenders, or non-profit grantees may not initiate tribal consultation.

Historic properties of religious and cultural significance include: archeological sites, burial grounds, sacred landscapes or features, ceremonial areas, traditional cultural places, traditional cultural landscapes, plant and animal communities, and buildings and structures with significant tribal association.

If a project includes any of the types of activities below, tribes must be invited to consult. Recognized tribes may be found through HUD's [Tribal Directory Assessment Tool](#):

- significant ground disturbance (digging)
- new construction in undeveloped natural areas
- incongruent visual changes
- incongruent audible changes
- incongruent atmospheric changes
- work on a building with significant tribal association

transfer, lease or sale of a historic property of religious and cultural significance. If none of the above applies proceed to the next section. Contact IHCDa if you are uncertain if your project falls under this requirement.

LUG applicants must attach a letter of determination of effect from the Chief Executive Officer. New construction applicants must provide the tribal consultation draft letter to IHCDa in Word format.

Categorically Excluded Projects STOP here.

**All projects required to be “Assessed” shall complete Part 4 below.
Part 4. Environmental Assessment**

4-1. Unique Natural Features and Areas

4-1-1. Features in Vicinity

Is the site near any unique natural features (i.e., sand dunes, coastal bluffs, cliffs, waterfalls, gorges, earthquake faults, fossils, unusual rock formations, other natural features of local significance, etc.)?

☐ Yes ☐ No

Is the site near any scenic areas on either public or private land?

☐ Yes ☐ No

Are there any other natural resources visible from the site?

☐ Yes ☐ No

4-1-2. Features on Site

Are there other natural resources present on the site?

☐ Yes ☐ No

4-1-3. Assessment of Impact

If YES to any of the above, will any such resources be adversely affected by the project?

☐ Yes ☐ No

If YES to any of the above, will any such resources have an adverse effect on the project?

☐ Yes ☐ No

Comments:

Source Documentation: If YES to any of the above, attach photos of the feature.

Date of the site inspection:

Name of the person who did the site inspection:

4-2. Site Suitability

Has the site been used as a dump, sanitary landfill or mine water disposal area? ☐ Yes ☐ No

Is there indication of:

Loose/empty drums, barrels

☐ Yes ☐ No

Abandoned machinery, cars, refrigerators, etc.

☐ Yes ☐ No

Other waste material

☐ Yes ☐ No

Oil spills

☐ Yes ☐ No

Will the project be unduly influenced by:

Deterioration or postponed maintenance of adjacent buildings

☐ Yes ☐ No

Incompatible or poorly transitioned land uses

☐ Yes ☐ No

Inadequate off-street parking in the area

☐ Yes ☐ No

Utility installations

☐ Yes ☐ No

Are there other unusual conditions on site?

☐ Yes ☐ No If YES, explain:

Comments:

Source Documentation: If YES to any of the above, attach photos of the concern.

Date of the site inspection:

Name of the person who did the site inspection:

4-3. Compatibility with Surrounding Development

Is the project compatible with the surrounding area in terms of:

Land use

☐ Yes ☐ No

Height & Bulk

☐ Yes ☐ No

Building type (low/high rise)

☐ Yes ☐ No

Building Density

☐ Yes ☐ No

Source Documentation: If NO, attach photos of the surrounding sites and an explanation as to why the project still works at the proposed site.

Date of the site inspection:

Name of the person who did the site inspection:

4-4. Soil Stability, Erosion, and Drainage

Are there slopes on the proposed site?

☐ Steep ☐ Moderate ☐ Slight ☐ None

Is there evidence of slope erosion or unstable slope conditions on or near the site?

☐ Yes ☐ No

Is there evidence of ground subsidence, high water table, or other unusual conditions on the site?

☐ Yes ☐ No

Is there any visible evidence of soil problems (foundations cracking or settling, basement flooding etc.) in the neighborhood of the site?

☐ Yes ☐ No

Is there indication of cross-lot runoff, swales, drainage flows on the property?

☐ Yes ☐ No

Are there active rills and gullies on site?

☐ Yes ☐ No

Are there visual indications of filled ground?

☐ Yes ☐ No

If YES, was a 79(g) report/analysis submitted?

☐ Yes ☐ No

If your answer is YES to any of the above, you must seek comment from [The Indiana Geological Survey](#) and your [local Soil and Water Conservation District](#).

Have soil studies or boring been made for the project site of the area?

☐ Yes ☐ No

Do the soil studies or borings indicate marginal or unsatisfactory soil conditions?

☐ Yes ☐ No

Is a soils report (other than structural) needed?

☐ Yes ☐ No

Are structural borings or a dynamic soil analysis/geological study needed?

☐ Yes ☐ No

If the site is not to be served by a municipal wastewater disposal system, has a report of the soil conditions suitable for on-site septic systems been submitted?

☐ Yes ☐ No ☐ Not applicable

Are you aware of any consultation or permits from other agencies or departments with water and/or land oversight?

☐ Yes ☐ No

If YES, please describe reasons for consultation and provide copies of any communications, permit applications, or permits as supporting documentation.

Comments:

Source Documentation: If applicable attach: (1) Copies of correspondence with the Indiana Geological Survey and your local Soil and Water Conservation District. (2) Copies of any applicable soil studies, borings, or septic system studies. (3) Copy of the 79(g) report/analysis. (4) Any communication(s), permits for applications, or permits with any agency, municipality, or jurisdiction that has authority over the area.

Date of the site inspection:

Name of the person who did the site inspection:

4-5. Nuisances and Hazards

Will the project be affected by any natural hazards?

Faults, fractures

☐ Yes ☐ No

Unprotected water bodies

☐ Yes ☐ No

Hazardous terrain features

☐ Yes ☐ No

Other

☐ Yes ☐ No

Continued from previous page

Will the project be affected by any built hazards and nuisances not previously addressed in this Environmental Review?

Hazardous street	<input type="checkbox"/> Yes <input type="checkbox"/> No	Inadequately screened drainage	<input type="checkbox"/> Yes <input type="checkbox"/> No
Dangerous intersection	<input type="checkbox"/> Yes <input type="checkbox"/> No	catchments	
Inadequate separation of		High-pressure gas or liquid	
pedestrian/vehicle traffic	<input type="checkbox"/> Yes <input type="checkbox"/> No	petroleum transmission lines	<input type="checkbox"/> Yes <input type="checkbox"/> No
Children's play areas located next to		Overhead transmission lines	<input type="checkbox"/> Yes <input type="checkbox"/> No
freeway or other high traffic way	<input type="checkbox"/> Yes <input type="checkbox"/> No	Hazardous cargo transportation routes	<input type="checkbox"/> Yes <input type="checkbox"/> No
Inadequate street lighting	<input type="checkbox"/> Yes <input type="checkbox"/> No	Oil or gas wells	<input type="checkbox"/> Yes <input type="checkbox"/> No
Quarries / other excavations	<input type="checkbox"/> Yes <input type="checkbox"/> No	Other	<input type="checkbox"/> Yes <input type="checkbox"/> No
Railroad crossing	<input type="checkbox"/> Yes <input type="checkbox"/> No		

Will the project be affected by any other nuisances not previously addressed in this Environmental Review?

Odors	<input type="checkbox"/> Yes <input type="checkbox"/> No	Glare	<input type="checkbox"/> Yes <input type="checkbox"/> No
Vibrations	<input type="checkbox"/> Yes <input type="checkbox"/> No	Other	<input type="checkbox"/> Yes <input type="checkbox"/> No

Comments:

Source Documentation: If YES, attach photos of the hazards or nuisances and an explanation as to why the project still works at the proposed site.

Date of the site inspection: Name of the person who did the site inspection:

4-6. Water Supply, Sanitary Sewers, and Solid Waste Disposal

Is the site served by an adequate and acceptable water supply?

☐ Yes ☐ No

If YES, is the supply:

☐ Municipal or ☐ Private

If the water supply is non-municipal, has an acceptable system been approved by appropriate authorities and/or agencies?

☐ Yes ☐ No

If YES, please supply a letter from the appropriate authority and/or agency approving the non-municipal water supply system.

Is the site served by sanitary sewers and wastewater disposal systems?

☐ Yes ☐ No

If YES, is the system:

☐ Municipal or ☐ Private

If the sanitary sewers and wastewater disposal systems are non-municipal, has an acceptable system been approved by appropriate authorities and/or agencies?

☐ Yes ☐ No

If YES, please supply a letter from the appropriate authority and/or agency approving the non-municipal sanitary sewer and wastewater disposal system.

Is the site served by trash collection and solid waste disposal?

☐ Yes ☐ No

If YES, is the service:

☐ Municipal or ☐ Private

Comments:

Source Documentation: (1) Letter from appropriate authority and/or agency if a non-municipal water supply system will be used and has been approved. (2) Letter from appropriate authority and/or agency if a non-municipal wastewater disposal system will be used and has been approved.

4-7. Schools, Parks, Recreation, and Social Services

Will the local school system have the capability to service the potential school age children from the project?

☐ Yes ☐ No

Are parks and play spaces available on site?

☐ Yes ☐ No

If not on site, what is the approximate distance of parks and play spaces:

Will social services be available on site?

☐ Yes ☐ No

If not on site, what is the approximate distance of social services:

Comments:

4-8. Emergency Health Care, Fire and Police Services

Are emergency health care providers located within reasonable proximity to the project?

☐ Yes ☐ No Approximate response time:

Are police services located within reasonable proximity to the project?

☐ Yes ☐ No Approximate response time:

Is fire-fighting protection ☐ municipal or ☐ volunteer adequate and equipped to service the project?

☐ Yes ☐ No Approximate response time:

Comments:

4-9. Commercial/Retail and Transportation

Are commercial/retail shopping services nearby?

☐ Yes ☐ No Approximate distance:

Is the project accessible to employment, entertainment, shopping services by:

☐ public transportation or ☐ private vehicle?

Are the approaches to the project convenient, safe, and attractive?

☐ Yes ☐ No

Comments:

Exhibit H National Housing Trust Fund ONLY Awards

The Environmental Requirements for new construction and rehabilitation for Housing Trust Fund (HTF) projects under the Property Standards at 24 CFR § 93.301(f)(1) and (2) are similar to Part 50 and 58 Requirements for

other HUD-funded projects, but there are some differences. Projects requesting only HTF funding should meet the requirements below.

Projects requesting only HTF, and not in combination with other HUD sources, will require no level of review (same as CEST or Exempt Activity), no public comment period, and no request for release of funds and certification.

Application/Award #

Project Name:

Project Address:

Funding Amount:

Grant Number:

PART I: HTF Environmental Provisions Consistent with 24 CFR Parts 50 and 58 [24 CFR § 93.301(f)(1) and (2)]

The following sections of the ERR Workbook, Exhibit G must be filled out.

ERR Workbook	Requirement	Source Documentation	Requirement Met
Exhibit G, Part 1-1	The Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994	Color FEMA Map with project site identified	<input type="checkbox"/> Yes <input type="checkbox"/> No
Exhibit G, Part 2-1	Compliance with Applicable Plans	Zoning Map/Letter; IDNR Letter (if applicable); IDEM Letter (if applicable)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Exhibit G, Part 2-2	Sole Source Aquifers	EPA Letter (if applicable)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Exhibit G, Part 2-4	Endangered Species	Aerial site photos, site photos, endangered species lists	<input type="checkbox"/> Yes <input type="checkbox"/> No
Exhibit G, Part 2-5	Wild and Scenic Rivers	Wild and Scenic River pdf page	<input type="checkbox"/> Yes <input type="checkbox"/> No
Exhibit G, Part 3-2	Explosive and Flammable Operations	Map and Acceptable Distance Worksheet (if applicable)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Exhibit G, Part 3-4	Protection of Wetlands	NWI and USDA Maps with project location identified	<input type="checkbox"/> Yes <input type="checkbox"/> No

PART II: Additional HTF Environmental Provisions [24 CFR § 93.301(f)(1) and (2)]

2-1. Airport Hazards

24 CFR § 93.301(f) requires that HTF project activities are not permitted within the runway protection zones of civilian airports or the clear zones or accident potential zones of military airfields.

Is the project within 2,500 feet from the end of a runway at a civil airport or within 15,000 feet from the end of a runway at a military airport?

☐ Yes ☐ No

If YES, stop and consult IHADA.

Comments:

Source documentation: (1) Attach a color map showing the project location and the location of any civil airports or military airfields, along with their approximate distance from the project site.

2-2. Safe Drinking Water

The Safe Drinking Water Act of 1974 requires protection of drinking water systems that are the sole or principal drinking water source for an area and which, if contaminated, would create a significant hazard to public health.

Is the potable water system using only lead-free pipes, solder, and flux?

☐ Yes ☐ No ☐ N/A

If NO, the project is ineligible for NHTF funding. If YES, provide plans and specs to show the type of pipes, solder, and flux.

Comments:

Source Documentation: Attach architectural plans, product specs, etc.

2-3. Farmland Protection

The aim of the Farmland Protection Policy Act (FPPA) (7 U.S.C. 4201 et seq, implementing regulations 7 CFR Part 658, of the Agriculture and Food Act of 1981, as amended) is to minimize the effect of federal programs on the unnecessary and irreversible conversion of farmland to nonagricultural uses. Farmland subject to FPPA requirements does not have to be currently used for cropland.

Does your project include new construction, acquisition of undeveloped land, or conversion of land use that could potentially convert agriculture land to a non-agricultural use?

☐ Yes ☐ No

If YES, continue to next question. If NO, explain how you determined that agricultural land would not be converted. Provide any documentation to support your answer. You are finished with this section.

If YES, is the project land designated as "urbanized" on the Census Bureau map? Create and submit the map to support your answer. You are finished with this section. If NO, continue to the next question.

☐ Yes ☐ No

Is "important farmland" on the project site? Important farmland includes prime farmland, unique farmland, or farmland of statewide or local importance regulated under the FPPA. Refer to Appendix 3 to determine "important farmland."

☐ Yes ☐ No

If NO, include maps and other documentation that proves no "important farmland" is on site. You are finished with this section.

If YES, stop and consult IHADA. The NHTF project must not result in the conversion of unique, prime, statewide or locally significant agricultural properties to urban uses. No mitigation efforts are allowed under the NHTF program.

Comments:

Source Documentation: (1) If applicable, attach any documentation to show that your project is not converting agricultural land to another use. (2) For land already committed to urban development, provide the census map (see Appendix 3, Resources). (3) Maps and other documentation to proves no "important farmland" is on site (see Appendix 3, Resources).

2-4. Noise Abatement and Control

HUD's noise standards are found at [24 CFR Part 51, Subpart B](#). The regulations protect new construction and rehabilitation residential properties from excessive noise exposure. HUD encourages mitigation to noise as appropriate.

Normal accepted ranges for noise is less than 65 dB. If the exterior noise level is between 65 dB and 75 dB, mitigation measures must be implemented to meet the interior noise level standards of no more than 45 dB. If there are exterior noise levels of 75 dB or greater, mitigation measures must be implemented to meet the interior noise level standards of no more than 45 dB and there must be no outside noise sensitive uses involved in the project.

Is the project new construction or rehabilitation of a residential structure?

☐ Yes ☐ No

Is the project located near any of the following major noise sources?

Civilian or military airports (within 15 miles) ☐ Yes ☐ No
Major roads with greater than 10,000 Average Daily Trips (ADT) (within 1,000 feet)? ☐ Yes ☐ No
Railroad (within 3,000 feet)? ☐ Yes ☐ No

If NO, submit the appropriate source documentation proving this and you are finished with this section.

If YES and the project is new construction, comply with 24 CFR 51, Subpart B. Refer to IHCD Appendix 3 for making maps. Use adopted DNL contours if the noise source is an airport.

If YES and the project is rehab of an existing structure, you must have noise attenuation measures incorporated into your project design and specs. Explain the noise attenuation measures:

If YES and the project contains balconies, other development standards may apply. Stop and contact IHCD immediately.

Comments:

Source Documentation: (1) Attach a map showing the project location and the locations of any relevant roads, railroads, or airports, along with their approximate distance from the project site. (2) Attach aerial photos. (3) Attach topographic maps that show elevation contours. (4) If applicable, attach a copy of the applicable HUD Noise Abatement and Control worksheets [here](#) and/or IHCD Appendix 10 HUD Airport Noise worksheet. (5) If yes to any of the above and you are doing new construction, comply with 24 CFR 51, Subpart B.

2-5. Environmental Protection

2-5-1. Air Quality

Section 176 (c) of the Clean Air Act requires all federal agencies that permit, fund or approve actions to ensure that actions conform with approved state plans for air quality before the action is approved. This is done at the national and state levels.

Does the project include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units? ☐ Yes ☐ No

If NO, then skip to section 2-5-2. If YES, answer the next question.

Is the project in a nonattainment area? ☐ Yes ☐ No

If NO, then skip to section 2-5-2. If YES, answer the next two questions. Provide the National Ambient Air Quality Standard designation, classification and nonattainment status not met:

Determine the estimated emissions levels of your project for each of the criteria pollutants that are in the nonattainment status on your project area. Will your project exceed the *de minimis* or threshold emission levels? ☐ Yes ☐ No

If YES, contact IDEM for comment.

Comments:

Source Documentation: (1) Attach the Indiana Nonattainment Map. (2) If applicable, print off relevant maps or materials and attach. (3) If applicable, attach letter requesting comment from IDEM and IDEM's comment letter.

2-5-2. Contamination and Toxic Substances

All properties assisted with HTF funds 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 use of the property. All proposed multifamily (more than four housing units) HTF projects require a Phase I Environmental Assessment (ESA-ASTM).

Does required Phase I Environmental Assessment for the property include any recognized environmental concerns (RECs)?

☐ Yes ☐ No

If YES, a Phase II (ESA-ASTM) will be required. ASTM reports shall be prepared in accordance with the most current ASTM standard.

Is the HTF project site located within .25 miles of a Superfund or CERCLIS (Comprehensive Environmental Response, Compensation, and Liability Information System) site or other contaminated site reported to Federal, State, or local authorities?

☐ Yes ☐ No

If YES, please provide a statement in writing from the EPA or the appropriate State agency that there is no hazard that could affect the health and safety of the occupants or conflict with the intended use of the property.

Comments:

Source Documentation: (1) Attach Phase I ESA and if applicable, Phase II ESA. (2) If applicable, provide a map identifying the project location and the location of the potential toxic or radioactive concern and showing the distance between them and an EPA or State Agency letter.

2-6. Historic Preservation

2-6-1. Standards

The project activities (including demolition) must not be performed on properties that are either listed in or determined eligible for listing in the National Register of Historic Places, unless the project activities meet the Secretary of the Interior's Standards for Rehabilitation, either as certified through the Federal and/or State historic rehabilitation tax credit programs or as verified by someone that meets the relevant Secretary of the Interior's Professional Qualification Standard.

Is the project listed or eligible for listing in the National Register of Historic Places individually or as part of a historic district?

☐ Yes ☐ No

If YES, does the project meet the [Secretary of Interior's Standards for Rehabilitation](#) – including the Standards related to new construction?

☐ Yes ☐ No

If YES, provide proof of the project meeting these standards.

If NO, please contact IHCD.

Comments:

Source Documentation: (1) Copy of aerial map showing the site is not listed on the NRHP individually or in a NRHP district according to [DNR's Indiana Historic Buildings, Bridges, and Cemeteries](#) site. Include SHAARD Reports as needed. (2) If listed, please provide proof of the project meeting the Secretary of Interior's Standards for Rehabilitation and New Construction.

2.6.2. Archaeological Resources

If archaeological resources or human remains are discovered on the project site during construction, the grantee must consult with affected tribes and/or descendant communities and comply with the Native American Graves Protection and Repatriation Act (25 U.S.C. 3001–3013), State law and/or local ordinance (e.g., State unmarked burial law).

Documentation of all consultation correspondence with the affected tribe and/or descendant communities, and how compliance with the Native American Graves Protection and Repatriation Act (25 U.S.C. 3001–3013), State law and/or local ordinance (e.g., State unmarked burial law) must be met for any HTF funded project to remain in compliance.

Comments: