



Environmental Review Frequently Asked Questions

Arlington County CoC - October 2018

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A. Background

According to the Department of Housing and Urban Development (HUD), “an environmental review is the process of reviewing a project and its potential environmental impacts to determine whether it meets federal, state, and local environmental standards. The environmental review process is required for all HUD-assisted projects to ensure that the proposed project does not negatively impact the surrounding environment and that the property site itself will not have an adverse environmental or health effect on end users. Not every project is subject to a full environmental review (i.e., every project's environmental impact must be examined, but the extent of this examination varies), but every project must be in compliance with the [National Environmental Policy Act \(NEPA\)](#), and other related Federal and state environmental laws.”

The Arlington County Department of Human Services (DHS) asked Housing Innovations (HI) to develop guidance for HUD CoC Program grantees on Environmental Review. HI received assistance from Milone and Macbroom in preparing this guidance. This FAQ is intended to help projects that receive funding through the Arlington County CoC process to remain in compliance with HUD Environmental Review requirements.

Please note the guidance provided in this document is not intended for projects entailing new construction, substantial rehabilitation or acquisition. Please also note that the limited scope CEST form requires answers to additional compliance factors not addressed in this document.

B. Filling Out the Forms

1. Does my CoC project need to complete an ER (Environmental Review) form?

If you complete an APR, you will need to complete an ER form.

2. Which form does my project need to complete?

To determine which form you should complete, please click on the following link for the CoC Program Environmental Review Flow Chart:

<https://www.hudexchange.info/resources/documents/CoC-Program-Environmental-Review-Flow-Chart.pdf>

3. How many forms should I fill out?

- The vast majority of organizations would fill out one ER form for each CoC grant.
- If you have one grant but locations that fall within multiple towns and need signatures from different Responsible Entities (RE), you may need to fill out multiple forms.
- If you have multiple grants, you will need to fill out one form per each grant at minimum, unless those multiple grants fund a single project location. In that case, list all grants on the same form.

4. If a project participant moves to a location that already has a completed ER, can that ER be used?

Yes, it can, as long as it was completed in the past 5 years and the environmental conditions have not changed.

5. Do you have to physically visit and walk around each property to complete the ER form?

No. In most cases, the form can be completed using information available on-line.

6. How do I complete the fields listed under “Project Information”?

- **What is the Project Name?**
 - That is the project name used in the most recent ESNAPS project application.
- **Who is the Responsible Entity?**
 - The unit of general local government within which the project is located that exercises land use responsibility, or if HUD determines this infeasible, the county, or if HUD determines this infeasible, the State. In Arlington County, Environmental Review forms have typically been signed by the County Manager and those signatures have been arranged by DHS.
 - Staff of a non-profit agency that receives CoC funds cannot sign those forms as the Responsible Entity.
- **Who is the Grant Recipient?**
 - The agency that applied for funding and that is listed in ESNAPS as the grant recipient should also be listed on the ER forms as the grant recipient.
- **Is the State/local Identifier the location of the housing?**
 - The identifier refers to the location of the housing. Many organizations do separate forms for each town in which units within the same project are located. This simplifies the process since the Responsible Entity is typically at the town/city level. In Arlington County, since the County Manager signs off as the Responsible Entity, this probably is not necessary.
 - You can certainly list multiple towns on one form. However, multiple versions of documentation will be needed in the attached materials. If the answers are different (e.g., say one location is in the floodplain and others are not), it may get a bit confusing to use a single form.
- **Preparer:**
 - This is the person preparing the form. Include Name, Title, Organization, and address at minimum.
 - There are no specific qualifications needed to be the preparer.
 - This will often be a staff member at the non-profit agency that receives CoC funds.
- **Certifying Officer Name and Title:**
 - An official from the Responsible Entity
 - Include Name, Title, Organization, and address
 - This cannot be an LMHA or non-profit agency staff person.
- **Consultant**
 - This will be N/A unless you have hired a consultant to complete the form.
- **Project Location**
 - For a single location this is typically designated by a street address.
 - For scattered site projects, attach a list of property locations.
 - Any sensitive locations, for example confidential domestic violence program locations, should not be listed. Such locations can be indicated as “confidential

location – available for HUD review upon request.” Keep the addresses on file and do not make the addresses public. Make sure all documentation is available if/when requested by HUD.

- **Description of Proposed Project**
 - In a few sentences describe the program, facility, location, and project intent/goal. Note whether the project uses tenant or project-based leasing or rental assistance.
 - Describe the entire scope of the project, including activities supported by non-CoC funds.

7. How do I complete the fields listed under “Funding Information”?

- **Grant Number**
 - The grant number listed on your grant agreement and/or in ESNAPS
- **HUD Program:**
 - This should be Continuum of Care
- **Funding Amount**
 - The amount of the HUD award found on the grant agreement or most recent Award announcement from HUD.
- **Estimated Total HUD Funding Amount**
 - If there are multiple grants from HUD in the project (e.g. you get project based Section 8 and CoC supportive services grants), put the total funds from all HUD grants being used to fund the project. In most cases the funding amount and estimated total HUD funding amount will be identical.
- **Estimated Total Project Cost:**
 - Include HUD funding plus non-HUD funding sources used in the project. This includes but is not limited to the matching funds you listed in your project application.
 - For example, if you receive \$100,000 from the HUD CoC program, you match that with \$25,000 from the County and you also use another \$30,000 in private funds to support the project, list estimated project costs at \$155,000 with other assistance listed in the appropriate space on the form.

8. How do I complete the Airport Runway Clear Zones and Accident Potential Zones item?

- The Compliance Determination field may be completed with the following statement:
“This project consists of (INSERT RELEVANT BUDGET LINE ITEMS, E.G., LEASING, RENTAL ASSISTANCE, OPERATING, SUPPORTIVE SERVICES) and is in compliance with HUD’S airport hazard regulations without further evaluation.”

9. How do I complete the Coast Barriers Resources item?

- Virginia is a Coastal Zone state; however, as of the date of this document, Arlington County CoC does not include any coastal counties.
- The Compliance Determination field may be completed with the following statement:
“This project is in compliance with the Coastal Barriers Resources Act because the CoC area does not include any Coastal Barrier Resources. See attached map demonstrating that no projects covered under this review are located within a coastal county or Coastal Barrier Resource Unit.”

- Attach the map located at the end of this document to the ER form.
- To obtain an updated map, use the Fish and Wildlife Service Coastal Barriers Resource Mapper available online at: <https://www.fws.gov/cbra/maps/mapper.html>
- Placements within a Coastal Barriers Resource Unit (CBRU) may not be viable. Responsible Entities are directed to reject any project located within a CBRU.

10. How do I complete the Flood Insurance item?

- For CoC projects, as a condition of the recipient using any HUD funds, HUD requires that flood insurance protection be purchased for any project located in Special Flood Hazard Areas (SFHA), which is also known as the 100-year flood zones.
- The building should be covered under a policy obtained by the building owner. Proof of insurance should be obtained and maintained on file.
- An exception to the flood insurance requirement is leasing or rental assistance projects that do not involve repairs, improvements, or acquisition, may write on the CENST form: “This project consists only of leasing/rental assistance and, therefore, flood insurance is recommended but not required. The project is in compliance with the National Flood Insurance Program without further evaluation.”
- To check if a property is within a flood zone go to: <https://msc.fema.gov/portal/search>
- If the exception above does not apply to your project, print the map from the FEMA website above and indicate your project’s location on the map. Obtain proof of flood insurance if required.

C. Updating the Forms

1. Do ER forms need to be filled out once every 5 years only or do they need to be filled out every time a unit at a new location is assisted (e.g. when a tenant moves or enters the project)?

- If you have someone moving into a property where an ER form has already been completed, then no you do not have to fill out a new form. For example, if a client moves into a multifamily property that already has a completed CENST or CEST form on file, and it is current, meaning it has been completed within the last 5 years and the environmental conditions have not changed, a new form does not need to be filled out. If it has been over 5 years or the environmental conditions have changed, a new form must be completed.
- If you have someone moving into a new property that has never had an ER form completed, then yes, you must fill out a form. However, a new location can be added to an existing CENST form if the project involves scattered site tenant-based rental/leasing assistance. If the new location has not been checked for Coastal Barrier Resources or for the location of the floodplain, that will need to be done and maps for the new property will have to be kept on file. Current environmental review is required for each building prior to signing a lease for any units in that building.
- All projects will need to complete ER forms at least every five years.

2. If you have to fill out a new ER form when a new unit is leased, does:

- **The address list need to be updated with the new information?**
 - Yes

- **The form with the updated address list need to be re-signed by the Responsible Entity?**
 - Yes. However, some providers have reported that their RE's have authorized them to update the address list without continuously coming back for a new signature.

- 3. What if the newly leased unit falls within the parameters of the original maps?**
 - If the new unit falls under a funding source and program for which a form has been completed within the last five years and the location falls within the previously reviewed area, the new address can be added to the list of addresses and then the review is complete.

- 4. If the ER form was incorrectly filled out or if I filled out the wrong form, do I have to re-do it?**
 - If the form was incorrectly completed, you should make the necessary corrections.
 - If you filled out a CENST form and needed to fill out a CEST form, information is missing since the shorter form was completed, and you should complete the correct form.
 - If you correctly filled out CEST form instead of a CENST form, all the required information is covered on the CEST form and you do not need to complete the correct form. When you update the form, use the correct version.

- 5. Do I have to fill out a form again if something substantially changed in the environment?**
 - Yes. For example, a natural disaster, like the recent flooding in Houston, that significantly impacts the area may necessitate completing the form again. Another example would be if there is new ground contamination, like an oil leak from an oil tank, that may necessitate completing the form again as well.

- Each provider is responsible for completing their environmental review documentation for the units they manage and for keeping the documentation on file
- Check with your local DMHAS representative for specific instructions on documentation submission to DMHAS and upload instructions to ESNAPS

D. Additional Resources

1. Where can I find word documents of the ER forms?

CENST (for tenant-based rental & leasing assistance) - click 'CoC Tenant-based CENST format' link at bottom of page

<https://www.hudexchange.info/resource/4045/coc-program-environmental-review-flow-chart/>

CENST (for operating costs, supportive services): Click link at bottom of the page

<https://www.hudexchange.info/resource/3141/part-58-environmental-review-exempt-or-censt-format/>



Limited Scope CEST form (for project-based rental & leasing assistance) click ‘CoC Program ‘CEST’ Limited Scope Review’ link at bottom of page

<https://www.hudexchange.info/resource/4045/coc-program-environmental-review-flow-chart/>

2. Where can I find the Environmental Review Flow Chart?

<https://www.hudexchange.info/resource/4045/coc-program-environmental-review-flow-chart/>

3. Where can I find Limited Scope Environmental Review instructions from HUD?

<https://www.hudexchange.info/resource/3800/limited-scope-environmental-review-coc/>

4. Where can I find the HUD video on how to complete Environmental Reviews for Continuum of Care programs?

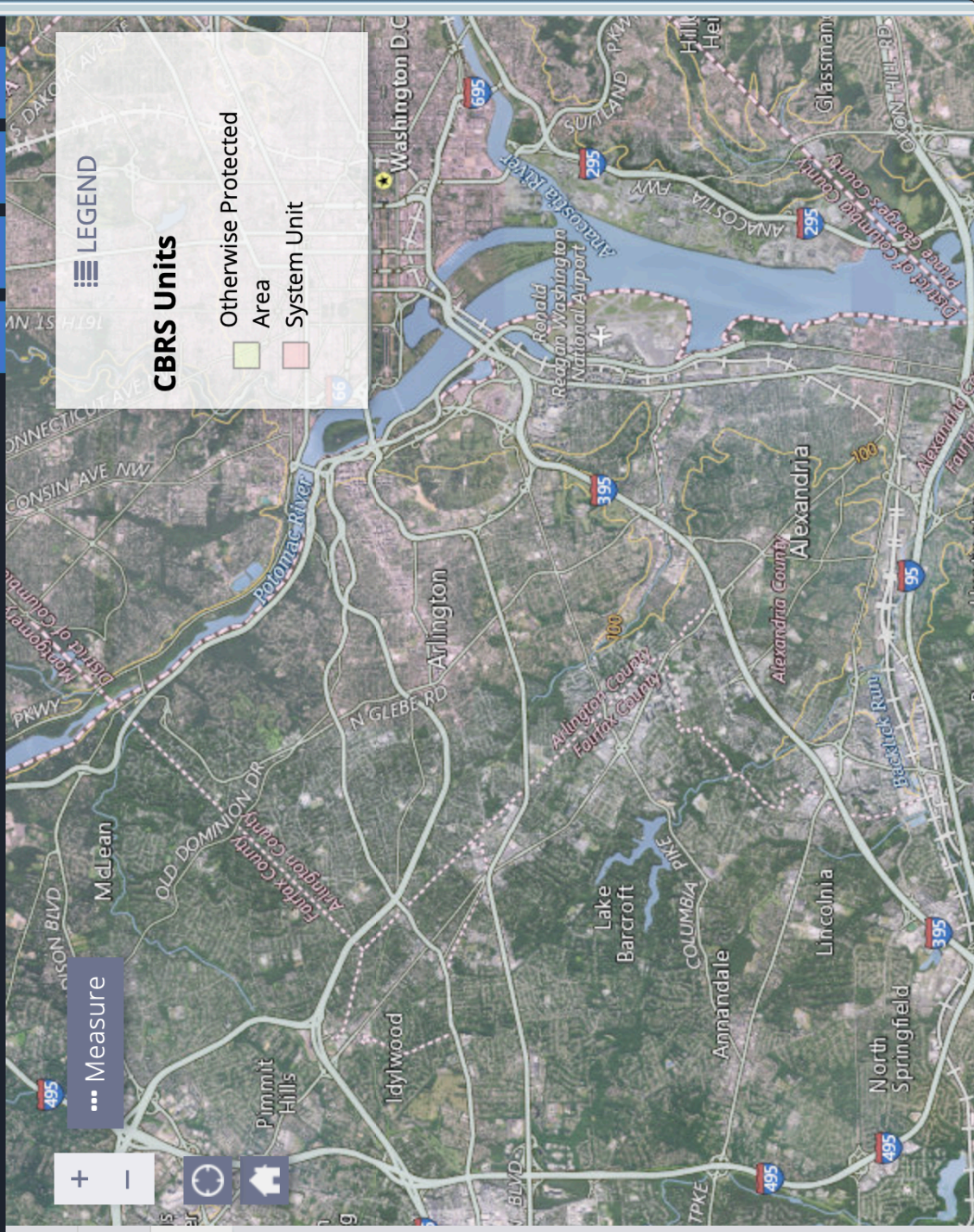
<https://www.youtube.com/watch?v=84HRDYgNbmQ>

E. Coastal Barriers Resources Map – Arlington County, CA

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Coastal Barrier Resources System Mapper

U.S Fish & Wildlife Service



BASEMAPS >

MAP LAYERS >

CBRS Units

Click [here](#) to learn more about CBRS Units.