

Community Development Block Grant

Environmental Review Training



Choice Limiting Actions

- Any action taken after an application is submitted that may disqualify the project from receiving federal funds



Choice Limiting Actions

- Includes:
 - Acquisition
 - Rehabilitation
 - Construction
 - Demolition
 - Relocation
 - Contracting for or committing any of the above actions

Choice Limiting Actions

- Must complete the environmental review and receive authority to use grant funds before doing anything else



Getting Started

- Determine the level of review required
- Depends on the type of project
 - Exempt activities
 - Categorically excluded, not subject to part 58.5
 - Categorically excluded, subject to part 58.5
 - Tiered reviews
 - Environmental assessment
 - Environmental impact statement

Exempt Activities

(24 CFR 58.34(a))

- Administrative and management activities
- Project planning and capacity-building activities
- Technical assistance and training
- Environmental studies, engineering and design
- Public services
- Very quick review process

Categorical Exclusion for Activities Not Subject to Part 58 (24 CFR 58.35(b))

- Commonly referred to as CENST
- Housing
 - TBRA and supportive services
 - Down payment assistance programs
 - Pre-development activities

Categorical Exclusion for Activities Not Subject to Part 58 (24 CFR 58.35(b))

- Economic development
 - Equipment purchases
 - Operating costs not associated with construction or expansion of existing operations
- Quick review period

Categorical Exclusion for Activities Subject to Part 58 (24 CFR 58.35(a))

- Commonly referred to as CEST
- Housing
 - Acquisition only
 - Rehab with less than 20% change in unit density and no change in land use
 - New construction of four or fewer units on one lot, or five or more units on scattered sites

Categorical Exclusion for Activities Subject to Part 58 (24 CFR 58.35(a))

- Public facilities and community facilities
 - Acquisition and rehabilitation with less than 20% change in scale, size or capacity and no change in land use
- Minimum 45-80-day review process

Tiered Reviews

- Projects involving the same or similar activities in multiple locations in a larger area
 - Tier 1: Broad level review
 - Clears the larger area of specific environmental factors to simplify the process for multiple sites
 - Sets the process for how specific properties are reviewed

Tiered Reviews

- Tier 2: Site-specific review
 - Clears the specific properties based on what's outlined in broad level review
- 45-80-day review process

Environmental Assessment

- Anything not specified under another level of review for all housing, public facilities, community facilities and economic development projects
 - Demolition
 - New construction
 - Acquisition and rehabilitation that increases size/capacity more than 20%
- Minimum 90-100-day review process

Environmental Impact Statement

- Very rare
- Required if:
 - Environmental assessment results in a finding of significant impact
 - Construction, demolition, rehabilitation or infrastructure to 2,500 or more housing units
 - Project is so large there's no way it could not have a significant impact



Getting Started

- Resources to complete environmental reviews yourself are available online but will add significant time and may not save money.
- Budget for consultants
 - Environmental reviews can be lengthy and time consuming.
 - Consultants keep things moving but add cost.

Getting Started

- Be sure to note potential issues at the time of application.
 - Note floodplains, wetlands, explosives/flammable hazards and contamination in particular.
 - The environmental checklist in the application helps but is not the same process.



Questions?