

LOGO HERE	NORTHERN CIRCLE INDIAN HOUSING AUTHORITY OPERATING PROCEDURE		No.	[Doc. No.]
	PROCEDURES FOR ENVIRONMENTAL REVIEW COMPLIANCE		Effective Date	6-1-14
			Revision Letter	[A]
			Final Approver	Executive Director
Persons Affected: Executive Director, Construction Department Manager, Construction Department Program Assistant, Maintenance/Modernization Manager, Maintenance/Modernization Administrative Assistant, and Fiscal Officer		File Reference :		
		Approved:		
<p>1.0 <u>PURPOSE:</u></p> <p>To establish procedures to ensure that all activities and projects funded with federal funds including program income are in compliance with all applicable federal laws and authorities identified in Title 24 Part 58: <i>Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities</i>.</p> <p>2.0 <u>SCOPE:</u></p> <p>2.1 The member tribes of Northern Circle Indian Housing Authority (NCIHA) are the <i>Responsible Entity</i> (as defined under the National Environmental Policy Act (NEPA) of 1969), and are legally responsible for compliance with NEPA (§58.2(a)(7)(ii)). As the Tribally Designated Housing Entity (TDHE) the NCIHA is a participant in the compliance with NEPA and has been delegated the procedural and technical duties to ensure each member tribe’s compliance with HUD regulations at <u>24 CFR § 58 (APPENDIX A)</u>.</p> <p>2.2 These procedures are established to ensure that the NCIHA does not commit IHBG, ICDBG, Title VI, or Section 184 funds, nor any non-HUD funds, that would have an adverse environmental impact or limit the choice of reasonable alternatives until HUD approval is received for a release of funds request (§58.22).</p> <p>2.3 If any of these procedures are interpreted to be in conflict with the regulations at 24 CFR § 58, the regulations shall take precedence.</p> <p>3.0 <u>DEFINITIONS:</u></p> <p>For definitions of terms and/or abbreviations contained in this procedure, please refer to APPENDIX B.</p>				

4.0 RESPONSIBILITIES

- 4.1 The [Tribal Chairperson](#) is the *Certifying Officer (CO)* and is responsible for signing and executing the *Request for Release of Funds and Certification (HUD Form 7015.15)*. **Persons temporarily “acting” on behalf of the Certifying Officer are not authorized to sign this form unless there is a formal resolution or written delegation of authority.** *The tribe must execute a certification of environmental compliance (Request for Release of Funds and Certification, HUD form 7015.15) whenever categorical exclusions cannot convert to exempt, or an environmental assessment (EA) or environmental impact statement (EIS) is required.* The Tribal Chairperson, as the Certifying Officer, is the “responsible Federal official” as that term is used in section 102 of NEPA and in statutory provisions cited in § 58.1(b). The Certifying Officer is therefore responsible for all the requirements of section 102 of NEPA and the related provisions in 40 CFR parts 1500 through 1508, and 24 CFR part 58, including the related Federal authorities listed in § 58.5. The Tribal Chairperson, as the Certifying Officer must also:
- 4.1.1 Represent the responsible entity and be subject to the jurisdiction of the Federal courts. The Certifying Officer will not be represented by the Department of Justice in court; and
 - 4.1.2 Ensure that the responsible entity reviews and comments on all EISs prepared for Federal projects that may have an impact on the recipient’s program.
 - 4.1.3 For the ERR, the NCIHA should have on file the signed Notification of Certifying Officer from each member tribe (**EXHIBIT “1”**).
- 4.2 The [Executive Director](#) is accountable to each [Tribal Chairperson](#) of the member tribes as the technical advisor for ensuring compliance with NEPA and, further, to ensure that the member tribe does not commit HUD funds, nor any non-HUD funds that would have an adverse environmental impact or limit the choice of reasonable alternatives until HUD approval is received for a release of funds request (Section 58.22).
- 4.2.1 The Commitment of funds includes, for example, execution of legally binding agreements (e.g., awarding construction contracts, entering into project agreements with a developer or subrecipient), purchasing materials, and hiring a consultant to carry out activities/projects that are not exempt.
 - 4.2.2 Commitment of funds also means taking choice limiting actions (e.g., real property acquisition, leasing, rehabilitation, demolition, site improvements, relocating buildings or structures), or initiating actions

that could have an adverse effect (e.g., demolition, dredging, filling, excavation). These prohibited actions also apply to project participants and because the Tribe bears responsibility for ensuring participants do not take these actions before the environmental review process has been completed, care should be taken when collaborating or partnering with other entities in a project or activity.

- 4.3 Under oversight of the Executive Director, the NCIHA [Construction Department Manager](#) is assigned lead responsibility to perform the necessary coordination and/or to conduct and complete, in a timely manner, the Environmental Review for activities and projects of the Construction Department according to the procedures and standards of 24 CFR § 58.
- 4.4 Under oversight of the [Construction Department Manager](#), the [Construction Department Program Assistant](#) is assigned responsibility to assist the Construction Department Manager to perform the necessary coordination and/or to conduct and complete, in a timely manner, the Environmental Review for all activities and projects of the Construction Department according to the procedures and standards of 24 CFR § 58.
- 4.5 Under oversight of the Executive Director, the [Maintenance/Modernization Manager](#) is assigned lead responsibility to complete Environmental Reviews for *Categorically Excluded subject to 58.5* activities of the Maintenance/Modernization Department.
- 4.6 Under oversight of the [Maintenance/Modernization Manager](#), the [Maintenance/Modernization Administrative Assistant](#) is assigned responsibility to assist the Maintenance/Modernization Manager to complete Environmental Reviews for *Categorically Excluded subject to 58.5* activities of the Maintenance/Modernization Department.
- 4.7 Under oversight of the Executive Director, the [Fiscal Officer](#) is assigned lead responsibility to complete the Environmental Review Record (ERR) for all *Exempt* activities (§58.34), and *Categorically Excluded NOT subject to 58.5* activities (§58.35(b)) of the NCIHA. Also, the [Fiscal Officer](#) is assigned responsibility for maintaining custody and oversight of the Environmental Review Records (ERR) for all activities and projects of the NCIHA assisted by the U.S. Department of HUD. And finally, the [Fiscal Officer](#) is assigned responsibility and delegated authority to verify ERR certification of compliance prior to release of all disbursements for activities and projects assisted by U.S. Department of HUD.

5.0 OVERVIEW OF ENVIRONMENTAL PROCESS:

- 5.1 All activities receiving financial assistance from the **IHBG and/or ICDBG, or program income** must have an environmental review completed before funds are committed and the project activity is initiated. Environmental reviews must also be completed for projects financed by the Section 184 Loan Guarantee program (authorized by the Housing and Community Act of 1992) and Title VI Loan Guarantee program (authorized by NAHASDA).
- 5.2 In consultation with the [Executive Director](#), the [Fiscal Officer](#), [Construction Department Manager](#) and [Maintenance/Modernization Manager](#) will initiate the environmental review process in accordance with the procedures and standards of 24 CFR § 58 as soon as projects are approved by the member tribes and for which financial assistance from HUD or program income is contemplated. This will ensure that all environmental factors are known early in the decision making process and that, if applicable, the public notification and release of funds processes will be completed in a timely manner and will not delay project implementation. A general flowchart of the NCIHA environmental review process is attached to these procedures (**EXHIBIT “2”**).
- 5.3 For each activity and/or project identified under a financial assistance agreement with HUD, the [Fiscal Officer](#), [Construction Department Manager](#) and [Maintenance/Modernization Manager](#) are responsible for labeling and setting up the **Environmental Review Record (ERR)** file folder with file contents checklist for each assisted activity or project. The ERR file will be the central location for all records and supporting documentation which demonstrates the Tribe’s ER compliance for a specific activity or project assisted by HUD.
- 5.1.1 The ERR files for all activities and projects of the NCIHA shall be kept in the Fiscal Office and must be made available and accessible for review and inspection by NCIHA member Tribes.
- 5.1.2 The [Fiscal Officer](#), [Construction Department Manager](#), [Construction Department Program Assistant](#), [Maintenance/Modernization Manager](#), and [Maintenance/Modernization Administrative Assistant](#) must maintain a shared electronic log of all ERR files created in order to track the status of an ERR through completion and in order to provide as a status report to the Executive Director as requested. The electronic log should also serve as the index to the physical records maintained in file cabinet located in the Fiscal Office. (**EXHIBIT “3”**)
- 5.1.3 The [Fiscal Officer](#) is responsible for the custody and maintenance of all ERR files.
- 5.1.4 ERR files must be retained for 3 years from the end of the tribal program

year during which the funds were expended. However, until this procedure is revised, it shall be the practice of NCIHA to maintain ERRs indefinitely.

- 5.2 Upon completion of an ER, the [Construction Department Manager, or Maintenance/Modernization Manager](#) must forward completed ER records (Statutory Worksheets) and supporting documentation which meets the compliance requirements of 24 CFR § 58 to the [Fiscal Officer](#) for filing.
- 5.3 A completed ERR will demonstrate compliance and certification signed by Certifying Officer of the determination of either: *Exempt, Categorically Excluded not subject to 58.5 (CENST), Categorically Excluded subject to 58.5 (CEST), Environmental Assessment with A Finding of No Significant Impact (FONSI), or Environmental Impact Statement with Finding of Significant Impact (FOSI)*.
- 5.4 **No funds may be disbursed for activities or projects assisted by HUD without a signed certification of completed ERR record to demonstrate environmental review compliance and whenever categorical exclusions cannot convert to exempt, or an environmental assessment (EA) or environmental impact statement (EIS) is required, a Release of Funds (ROF) Form 7015.16 from HUD (see EXHIBIT “11”).** The [Fiscal Officer](#) is responsible for verifying certification of completed ER prior to disbursement of funds.
- 5.5 Under oversight of the [Executive Director](#), the [Construction Department Manager and/or Maintenance/Modernization Manager](#) will ensure that NCIHA cooperates in any post-review monitoring and other inspection and enforcement actions that must be completed by the Tribe (using procedures provided for in program regulations) to assure that decisions adopted through the environmental review process are carried out during project development and implementation (§58.77(c)).

6.0 ENVIRONMENTAL REVIEW PROCEDURES:

6.1 DEFINE AND DETERMINE LEVEL OF REVIEW

- 6.1.1. Prior to the beginning of the NCIHA program year (no later than October 1), upon approval of proposed projects by NCIHA member tribes and notification of award from HUD/ONAP, the [Executive Director](#), [Fiscal Officer](#), [Construction Department Manager](#), and [Maintenance/Modernization Manager](#) will review approved tribal projects and other activities planned in the Indian Housing Plan (IHP) budget to evaluate and determine the level of environment review required (**Exhibit “4”**).

- 6.1.2. In determining level of review for identified projects, the planning will

consider *aggregation* and *tiering* (i.e., multi-year community-wide housing rehabilitation project) as appropriate (per 58.32 and 58.15).

6.2 EXEMPT

6.2.1. Environmental Review Procedures in 24 CFR Part 58.34(a)(1-12) allow the draw-down of HUD funds without completing a Request for Release of Funds (RROF) *if an activity is “Exempt”* and the determination is in writing.

6.2.2. For activities determined to be exempt under 24 CFR Part 58.34(a)(1-12) the [Fiscal Officer](#) will:

1. Prepare Exempt Environmental Review (**Exhibit “5”**)
2. Complete and route ERR documents to [Executive Director](#) for review and concurrence.

6.2.3. The [Fiscal Officer](#) will obtain Certifying Officer signatures for documents, and create the Environmental Review Record (ERR) file. The ERR file need only contain the following:

1. Designation by adopted resolution of Environmental Certifying Officer.
2. Copy of IHP Section 3 *Uses of Funding* (HUD-52737).
3. Environmental Review for Activity that is Exempt/Categorically Excluded Not Subject to 58.5 signed by the Certifying Officer.

6.2.4 The [Fiscal Officer](#) will complete ERR data log and file ERR. Funds may be drawn down for exempt activities, and no further approval from HUD is needed.

6.3 CATEGORICALLY EXCLUDED (CE), NOT SUBJECT TO 58.5

6.3.1 Environmental Review Procedures in 24 CFR Part 58.35(b)(1-7) allow the draw-down of HUD funds without completing a Request for Release of Funds (RROF) *if all* project activities can be considered “Categorically Excluded” AND no activities are affected by federal statutes or executive orders.

6.3.2. For activities determined to be Categorically Excluded and not subject to 58.5 the [Fiscal Officer](#) will:

1. Prepare Finding of Categorically Excluded, Not Subject to 58.5 (**Exhibit “6”**)
 2. Complete 58.6 Compliance Checklist (**Exhibit “6”**)
 3. Complete and route ERR documents to [Executive Director](#) for review and concurrence.
- 6.3.3. The [Fiscal Officer](#) will obtain Certifying Officer signatures for both documents, and create the Environmental Review Record (ERR) file. The ERR file need only contain the following:
1. Designation by adopted resolution of Environmental Certifying Officer.
 2. Copy of IHP Section 3 *Uses of Funding (HUD-52737)*.
 3. Environmental Review for Activity that is Exempt/Categorically Excluded, Not Subject to 58.5 signed by Certifying Officer.
- 6.3.4 The [Fiscal Officer](#) will complete the ERR data log and file ERR. Following award of the assistance, no further approval from HUD is required and funds may be drawn down for these categorically excluded activities.
- 6.4 CATEGORICALLY EXCLUDED (CE), SUBJECT TO 58.5 - Maintenance/Modernization Department Procedures
- 6.4.1 Most *maintenance* activities of the Maintenance/Modernization Department performed on the assisted housing stock of member tribes will be determined to be categorically excluded not subject to 58.5 (§ 58.35(b)(3)); however as required under § 58.35 (a), repair, rehabilitation or modernization activities on assisted housing stock of the NCIHA member tribes will be determined to be subject to 58.5. In making the determination between maintenance and repair/rehab activities, NCIHA will utilize definitions in the HUD Memorandum dated February 8, 2016 (**Exhibit “7”**).
- 6.4.2 For repair and/or rehabilitation activities determined to be Categorically Excluded and subject to 58.5, prior to the beginning of each new Program Year (PY), the [Maintenance/Modernization Manager](#) will complete a *project aggregation* environmental review (per §58.32) which includes grouping together for review all housing units under management of NCIHA. For these activities determined to be Categorically Excluded and subject to 58.5 the [Maintenance/Modernization Manager](#) will:

1. Complete an Environmental Review for an Activity that is Categorically Excluded Subject to 58.5 environmental review (**Exhibit “6”**) For instructions, additional guidance and technical resources to assist you in completing the review, see **Appendix C**.
 2. Route ERR documents to [Executive Director](#) for review and concurrence.
- 6.4.3. The [Maintenance/Modernization Manager](#) will obtain Certifying Officer signatures for above documents and create the Environmental Review Record (ERR) file (§58.38). The ERR file need only contain the following:
1. Designation by adopted resolution of Environmental Certifying Officer.
 2. Completion of Categorically Excluded, Subject to 58.5 Environmental Review signed by appropriate Certifying for each NCIHA housing unit.
- 6.4.4 If in the completion of the 58.5 Statutory Worksheet any NCIHA housing unit cannot convert to *Exempt* status because one or more statutes or authorities require formal consultation or mitigation, the [Maintenance/Modernization Manager](#) must notify the [Executive Director](#). Under oversight of [Executive Director](#), NCIHA must complete consultation/mitigation protocol requirements, publish NOI/RROF and obtain Authority to Use Grant Funds (HUD 7015.16) per §58.70 and §58.71 before committing or drawing down funds
- 6.4.5 For all activities on NCIHA managed units that convert to *Exempt* status, the [Maintenance/Modernization Manager](#) will complete the ERR data log and deliver completed ERR files to the Fiscal Officer. Following award of the assistance, no further approval from HUD is required and funds may be drawn down for these (NOW) determined exempt activities.
- 6.4.6 In the completion of Maintenance/Modernization Department activities during the PY, the [Maintenance/Modernization Manager](#) must ensure that activities remain in the scope of planned activities approved in the original *project aggregation* environmental review. Changes in the scope and budget for rehabilitation/modernization work will require additional review and an updated Categorically Excluded Subject to 58.5 review (**Exhibit “6”**) for the applicable housing units [*i.e. scope of rehabilitation work on a rental unit is expanded later in the PY and the estimated cost*

of rehabilitation is now more than 75 percent of the total estimated cost of replacement. This change would now require an EA and is no longer Categorically Excluded].

6.5 CATEGORICALLY EXCLUDED (CE), SUBJECT TO 58.5 - Construction Department Procedures

- 6.5.1 By nature of its work, activities and projects of the Construction Department will be determined to be categorically excluded subject to 58.5 (§ 58.35(a)(1-6)), OR, if a project is not exempt or categorically excluded under §58.34 and §58.35, the NCIHA must prepare an Environmental Assessment (EA) (per 24 CFR §58 Subpart E).
- 6.5.2 All projects and activities of the Construction Department requiring an EA will be done under contract with a third party environmental consulting contractor (see 6.6 of this procedure).
- 6.5.3 For activities and projects determined to be Categorically Excluded and subject to 58.5 the [Construction Department Manager](#) will:
1. Complete a Categorical Excluded Subject to 58.5 environmental review (**Exhibit “6”**) For instructions, additional guidance and technical resources to assist you in completing the review, see **Appendix C**.
 2. Route ERR documents to [Executive Director](#) for review and concurrence.
- 6.5.4 The [Construction Manager](#) will obtain Certifying Officer signatures for the above documents and create the Environmental Review Record (ERR) file (§58.38). The ERR file need only contain the following:
1. Designation by adopted resolution of Environmental Certifying Officer.
 2. Environmental Review for Activity that is Categorical Excluded, Subject to 58.5 signed by appropriate Certifying Officer with verifiable source documents and relevant base data. These documents may be incorporated by reference into the ERR provided that each source document is identified and available for inspection by interested parties.
- 6.5.5 If in the completion of the 58.5 Statutory Worksheet a proposed project/or activity cannot convert to *Exempt* status because one or more statutes or authorities require formal consultation or mitigation, the [Construction](#)

[Manager](#) must notify the [Executive Director](#). Under oversight of [Executive Director](#), NCIHA must complete consultation/mitigation protocol requirements, publish NOI/RROF and obtain Authority to Use Grant Funds (HUD 7015.16) per §58.70 and §58.71 before committing or expending funds.

6.6 ENVIRONMENTAL ASSESSMENT (EA)

6.6.1 For projects and activities of the NCIHA that are not exempt or categorically excluded under §58.34 and §58.35, the [Executive Director or his/her designee](#) will prepare a Request for Proposal (RFP) to solicit proposals from a qualified environmental firm or consultant to complete the EA in compliance with 24 CFR 58 SUBPART E.

6.6.2 The NCIHA will require the EA be completed meeting, at a minimum, the HUD-recommended format (**EXHIBIT “8”**).

6.6.3 Based on completed EA, NCIHA will make one of the following findings:

A Finding of No Significant Impact (FONSI), in which the responsible entity determines that the project is not an action that will result in a significant impact on the quality of the human environment. NCIHA will proceed with Request for Release of Funds process (see Section 6.8 of this procedure), or

A Finding of Significant Impact in which the project is deemed to be an action which may significantly affect the quality of the human environment. NCIHA must then proceed with its environmental review under subpart F or G of 24 CFR 58.

6.6.4 The [Executive Director or his/her designee](#) will obtain Certifying Officer signatures for the above documents and create the Environmental Review Record (ERR) file (§58.38). The ERR file need only contain the following:

1. Designation by adopted resolution of Environmental Certifying Officer.
2. Environmental Assessment Determinations and Compliance Findings for HUD-assisted Projects signed by appropriate Certifying Officer, with verifiable source documents and relevant base data. These documents may be incorporated by reference into the ERR provided that each source document is identified and available for inspection by interested parties.
3. Public Notice(s)
4. Request for Release of Funds (form HUD-7015.15)

5. Authority to Use Grant Funds (form HUD-7015.16)

6. Correspondence with SWONAP and public comments.

6.4.5 Upon receipt of Authority to Use Grant Funds (form HUD-7015.16), The [Executive Director or his/her designee](#) complete the ERR data log and deliver completed ERR files to the Fiscal Officer. No further approval from HUD is required and funds may be drawn down for the project /activities.

6.7 ENVIRONMENTAL IMPACT STATEMENT (EIS)

Based on threshold criteria of \$58.37, it is determined that NCIHA will not engage in projects or activities which would require completion of an EIS.

6.8 REQUEST FOR RELEASE OF FUNDS PROCESSING

6.8.1 The [Executive Director or his/her designee](#) will publish a Notice of Intent to Request a Release of Funds (NOI/RROF) for all projects that are Categorically Excluded Subject to \$58.5 and do not convert to Exempt Status using the current HUD-recommended format (**EXHIBIT “9”**).

6.8.2 For all Environmental Assessments with a FONSI determination, [Executive Director or his/her designee](#) will publish a combined Notice of Finding of No Significant Impact and Notice of Intent to Request a Release of Funds (FONSI/NOI/RROF) as provided by \$58.43 (b), using the current HUD-recommended format (**EXHIBIT “10”**).

6.8.3 At a minimum, [Executive Director or his/her designee](#) will send the NOI/RROF or FONSI/NOI/RROF notice to individuals and groups known to be interested in the activities, to the local news media, to the appropriate tribal, local, State and Federal agencies; to the Regional Offices of the Environmental Protection Agency having jurisdiction and to the HUD Field Office (or the State where applicable). The [Executive Director](#) may direct that the NOI/RROF notice is published in a newspaper of general circulation in the affected community. If the notice is not published, it will be prominently displayed in public buildings, such as the local Post Office and within the project area or in accordance with procedures established as part of the citizen participation process. The public comment period is as follows:

Notice of Intent to Request a Release of Funds (NOI/RROF) is

7 days when published or,

10 days when mailed and posted, counting from the day after the publication, mailing or posting date.

Combined Notice of Finding of No Significant Impact and Notice of Intent to Request a Release of Funds (FONSI/NOI/RROF) is

15 days when published or,

18 days when mailed and posted, counting from the day after the publication, mailing or posting date.

6.8.4 The [Executive Director](#) will consider the comments received and make modifications, if appropriate, in response to the comments, before it certifies and submits the NOI/RROF or FONSI/NOI/RROF to HUD.

6.8.5 Following the comment period, the [Executive Director](#) will complete form HUD-7015.15 **Request for Release of Funds (RROF) (EXHIBIT “11”)**, which must be printed on both sides and the original copy must be submitted to the HUD Southwest Office of Native American Programs. The RROF is a federal form and must not be altered in any way. In preparing a RROF, the [Executive Director](#) will ensure that all applicable sections are completed. This includes the following:

- HUD program for which funds are being requested is included
- The Name and Address of the RE
- Name and Address of the Recipient if it is not the RE
- Project description for which RE is requesting funds
- Indication of whether an EIS was or was not required
- Signature of the Certifying Officer
- Certification Date after expiration of public notice comment period
- Signature of the authorized officer of the Recipient when the Recipient is not the RE
- Date of signature of the Recipient after expiration of the public notice comment period.

If the RROF does not contain all of the information listed above, it will be returned to the NCIHA. The objection time period will not start until the RROF is completed as required.

6.8.2 HUD SWONAP must not approve an RROF for any project before 15 calendar days have elapsed from the time of receipt of the certified RROF or from the time specified in the notice published pursuant to §58.70,

whichever is later. If there are no objections received, HUD SWONAP will provide a signed **Authorization to Use Grant Funds**, form HUD-7015.16 (AUGF) (**EXHIBIT “12”**).

6.8.3 PLEASE NOTE: in no cases will NCIHA, or member tribes (as *Responsible Entities*), obligate HUD or non-HUD funds until we receive a fully executed copy of this form.

7.0 REVISION HISTORY

DATE	REV No.	CHANGE	Reference Section(s)
--/--/----	A	Initial Procedure drafted	n/a

8.0 LIST OF EXHIBITS and APPENDICES

LIST OF EXHIBITS

- EXHIBIT “1” - Sample Letter (Notification of Certifying Officer)
- EXHIBIT “2” - NCIHA Environmental Review Flowchart
- EXHIBIT “3” - Sample Format for Shared ERR Electronic Log
- EXHIBIT “4” - Summary of Levels of Environmental Review & Documentation Required
- EXHIBIT “5” - Environmental Review for Activity/Project that is Exempt or Categorically Excluded Not Subject to Section 58.5 with 58.6 Checklist
- EXHIBIT “6” - Environmental Review for Activity/Project that is Categorically Excluded Subject to Section 58.5 with 58.6 Checklist
- EXHIBIT “7” - HUD Memorandum dated February 8, 2016; Maintenance vs. Repair Definitions
- EXHIBIT “8” - HUD-Recommended EA Format
- EXHIBIT “9” - Sample Notice of Intent/Request for Release of Funds
- EXHIBIT “10” -Sample Notice of Finding of No Significant Impact and Notice of Intent to

Request a Release of Funds

EXHIBIT “11”- Form HUD 7015.15 (Request for Release of Funds)

EXHIBIT “12”- Form HUD 7015.16 (Authority to Use Funds)

LIST OF APPENDICES

APPENDIX A - 24 CFR PART 58—ENVIRONMENTAL REVIEW PROCEDURES FOR ENTITIES
ASSUMING HUD ENVIRONMENTAL RESPONSIBILITIES

APPENDIX B - Definitions of Terms and/or Abbreviations

APPENDIX C - Guidance and Resources for Completing Statutory Worksheets