

Part 58 Environmental Review Training

# HEROS 101: Tips and Tricks for Environmental Review

Kim Siegel, Environmental Compliance Specialist IV  
City of Detroit  
April 22, 2025



**TAKE PART**  
Opportunity Rising



# Introductions: HRD Environmental Review Team

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# Introductions: Who are you?

## Entitlement Community/Local Unit of Government/Responsible Entity

- Community Development Professional
- Environmental Professional
- Certifying Officer

## Environmental Consultant

## Historic Consultant

## Developer

## Sub-Recipient/Sub-Grantee

## Funder/Regulator

# NEPA Update

- As of the date of this presentation, there are no changes to HUD's guidance on how to comply with NEPA
- The City will continue to follow 24 CFR Part 58
- New guidance is expected from HUD in the near future



# NEPA Update – Maps

- Certain federal mapping systems, such as the EPA's Environmental Justice Mapper, are no longer available
- Additionally, some federal mapping systems (such as NEPAAssist) are sporadically working
- See if your state has a state mapping system in lieu of utilizing a federal mapping system

# Conduct the Environmental Review

HUD has specific requirements for Environmental Reviews and the “Environmental Review Record (ERR)”

- Detailed Project Description that aggregates all individual activities
  - Statutory Checklist or Environmental Assessment Checklist with **all** backup documentation and any correspondence with federal and state agencies
    - For additional information or resources, see the [HUD Exchange](#) site
  - All documentation for mitigation and any further work required
- Can use HUD’s Environmental Review Online System (HEROS) to submit ERRs directly to HUD

## Question 1:

Have you ever submitted an ER in HEROS?

# Registering for HEROS

- Every environmental review input into HEROS must have a **Responsible Entity (RE) preparer**; therefore, someone from the municipality should be registered as the RE in HEROS
- Information regarding HEROS access is [here](#)
- The HEROS Access Form is [here](#)

## Question 2:

Who are your Partner Users?

# Partner Users

- HUD requires the City of Detroit to submit all ERRs in the HEROS system. Therefore, all consultants must create and assign the ERR's to the City through HEROS.
  - Additionally, consultants submit a copy of their completed HEROS report and all attachments separately to ensure all documentation is received
- Consultants must register as **Partner Users** through HUD's HEROS website to gain access to the program.
  - Information regarding HEROS access is [here](#)
  - The HEROS Access Form is [here](#)
  - HEROS Partner User Guide is [here](#)



# Partner Users

- Partner Users can fill out the project information on behalf of the RE
  - Remember, the RE determines the level of review
- Also, Partner Users cannot check the box for formal mitigation or conditions – only the RE can do so

# One Year Deadline for ER

- Effective July 1, 2024: all new environmental reviews have a one-year deadline to receive the Authority to Use Grant Funds
- HEROS was updated to automatically display the date the environmental review was started in the system
- The City of Detroit considers this the start of the clock
- **Make sure RE Preparer and/or Partner Users have obtained all Federal, State, and Local clearances prior to starting the ER in HEROS!**

# HEROS Tips and Tricks

- Request HEROS access a minimum of two months prior to submission of the ERR
- Use HEROS early in the morning before west coast users log into the system
- **Save your work as often as possible!**
  - HEROS has multiple technical glitches
  - Some find it helpful to type out the answers in a Word doc and copy and paste the text into HEROS to ensure the work is properly saved within HEROS

# HEROS Tips and Tricks

- The Summary sections have text length limitations
- In the City of Detroit, Partner Users tend to run out of space for their text in the Contamination and Toxic Substances section
  - Partner Users may include the basic information in the summary section and upload a more robust summary page to the attachments section

# Report Accessibility

- Overall, HUD wants to ensure that any member of the public interested in reviewing the ER can ascertain the project scope and the need for the project, can identify the location of the project on maps, can understand the outcome of the proposed project, and its potential impacts to people and the environment.

# **Components of the HUD Part 58 Environmental Review**

**Project Information**



# Project Information

**1105 – Initial Screen (50/58 - Non-Tiered)** Project Name: HRD-ENVIRONMENTAL-TRAINING

Environmental Review Record created on May 12, 2023 by Kim Siegel.

★ Indicates that field is required

★ Project Name:

★ HUD Funding Source:  
Include only funding sources for which this review will fulfill HUD's environmental review requirements. Do not include funding sources that will require a separate environmental review (e.g. if this project is from both Part 50 and Part 58 programs).

Grant/Project Identification Number	HUD Program	Program Name
<input type="text" value="B22MC260006"/>	<input type="text" value="Community Planning and Development (CPD)"/>	<input type="text" value="HOME Program"/>
<input type="text" value="M1001"/>	<input type="text" value="Public Housing"/>	<input type="text" value="Project-Based Voucher Program"/>

★ Estimated Total HUD Funded, Assisted, or Insured Amount(\$):

★ Estimated Total Project Cost: \$   
This may be the same as the total HUD-funded, assisted, or insured amount.

★ Does this project anticipate the use of funds or assistance from another Federal agency in addition to HUD?

☐ No

☒ Yes

Explain:

State / Local Identifier [optional]:

- **Project Name:** Determined by Client
- **HUD Funding Source:**
  - Include all RE HUD program funding here
  - Can use placeholder for grant number/funding amount if not determined yet
- **Estimated Total HUD Funding:** Total allocation of HUD funding for RE HUD funding
- **Estimated Total Project Cost:** All sources
- **Other Federal Agency Source:**
  - Some projects may include American Rescue Plan Act funding or other sources of federal funding outside of HUD.
  - List all other types and amounts of federal funds here
- **State/Local Identifier:** Detroit, Michigan

# Project Information

## Responsible Entity (RE) Information:

Organization Name: DETROIT  
Address: PLANNING AND DEVELOPMENT DEPARTMENT  
ACCOUNTING SECTION  
150 WEST MICHIGAN AVENUE  
DETROIT  
Michigan  
48226

## \*RE Preparer Information:

Name: Kim Siegel, City of Detroit

## Certifying Officer Information (not required for exempt or CENST projects):

Name: Julie Schneider, Director

## Grant Recipient Information (if different from Responsible Entity):

Complete this section only if the grant recipient is not acting as the Responsible Entity.

☐ Search ☐ Other ☒ None

## Consultant Information:

Complete this section only if you represent a consultant firm or other contractor assisting with the environmental review.

☒ Search ☐ Other ☐ None

Name of Firm: PM Environmental

Name of Preparer: Name goes here

Cancel

Save and Continue

- **RE Preparer:** Kim Siegel, City of Detroit
- **Certifying Officer:** Julie Schneider, Director of HRD
- **Grant Recipient Information:** RE preparer can add in
- **Consultant Information (if applicable):** The Name & Company of the Partner User
- **40 CFR 1506.4(b)(4):** Preparer checks box confirming they have no financial or other interest in outcome of project

# Common Issues: Project Information

- Including sources of funding other than federal funding RE oversees (HOME, CDBG Public Indian Housing Project-Based Vouchers, etc.) to the “HUD Funding Sources” section
- Missing the State/Local Identifier

# Project Summary For Exempt/CENST

- **Description of Proposed Project**
  - Who, what, where, when, why, how
  - Project description can be minimal
    - i.e.: “The City will provide funding for public services including health care, education, senior services, housing services, legal services, day care and nutritional services including staff costs. Included in the review is a copy of the 2023 Public Service Budget that includes a list of the sub-recipients receiving funding. This review is for \$2,552,307.00 in CDBG 2023. This review is valid for up to five years”
  - Include the statement, “This environmental review is valid for five years” at the bottom of the project description text box

# Project Summary For CEST/EA

- **Description of Proposed Project**
  - Who, what, where, when, why, how
  - Describe what is currently at the site (i.e. vacant land, single-family homes, multi-family home, etc.)
  - State if the project includes acquisition or not
  - **We must aggregate the project; therefore, this description must include ALL work involved in the project regardless of the funding source**
  - The projects description in an RFP or a bid proposal should align with the ER project description at a minimum

# Project Summary CEST/EA

- Provide a detailed scope that includes the full scope of work that is feasible to occur within the next five years, including:
  - Action: Complete details about the entire project and what work will be done
    - i.e. The proposed project involves acquisition of the 1.0-acre site, demolition of an existing 10-story 40,000 square foot vacant building and new construction of two four-story 10,000 square-foot apartment buildings and one four-story 10,000 square-foot market rate building. The apartment building will contain five 500-square foot one-bedroom apartments and five 750 square foot two- bedroom apartments. All apartments will be affordable units at 40% AMI. The market rate building will contain 10 750 square-foot two-bedroom apartments. All units will have ground floor retail and provide Wi-Fi to residents. The exterior work includes overlaying the existing 5,000 square foot paved parking lot located east of the building with new concrete, upgrades to the storm sewers, construction of a new playground and a 2,000 square foot clubhouse for residents to utilize.
  - Project beneficiaries: affordable housing, mixed-use, senior housing, market rate, etc.
  - Include the statement, “This environmental review is valid for five years” at the bottom of the project description text box.



# Project Summary

- **Project Location**
  - **Street:**
    - Exempt/CENST Reviews: could use RE's office address
    - If there is more than one address, type “Multiple” here and add the list of addresses to the “Location Information” section
  - **Location Information:** Add multiple addresses here (if applicable)
  - **Uploads:**
    - List of subrecipients and funding for ESG/CDBG Public Service/Homeless reviews
    - Site map
    - Project site plans
    - Market Study

# Project Summary

- **Activities involved in the project:** Check ALL activities regardless of funding source
  - For Exempt/CENST reviews, check “Soft Costs”
- **For construction projects:**
  - **Change in land use:** Check this box for conversion from non-residential to residential, commercial to industrial, or from one industrial to another
  - **Planned use of the property after completion of the project:** Check all relevant uses

# Common Issues: Project Summary

- Vague Project Descriptions that do not include the entire scope of work regardless of funding sources
- Not including all activities on the Project Summary Screen
- Missing site map, market study, and other documents on Project Summary Screen page

# Levels of Review

- Exempt
- Categorically Excluded Not Subject to 58.5 (CENST)
- Categorically Excluded Subject to 58.5 (CEST)
- Environmental Assessment (EA)
- Environmental Impact Statement (EIS)

**The determination of the level of review should always comes from the RE**

# Cooperating Agency

1365 - Cooperating Agency (50/58)	Project Name: HRD-ENVIRONMENTAL-TRAINING
<p>Your previous responses indicate that this project anticipates the use of Federal funds or assistance from another agency in addition to HUD. State, Federal and local agencies may participate or act in a joint lead or cooperating agency capacity in the preparation of joint environmental impact statements or joint environmental assessments (see 40 CFR 1501.5(b) and 1501.6). A single EIS or EA may be prepared and adopted by multiple users to the extent that the environmental review addresses the relevant environmental issues and there is a written agreement between the cooperating agencies which sets forth the coordinated and overall responsibilities. 24 CFR 58.14, 40 CFR 1501.5(b) and 1501.6.</p>	
<p>Is there a formal Cooperating Agency Agreement governing the environmental review?</p> <p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p>	
<p>Check the reason an agreement was not reached:</p> <p><input type="radio"/> Not initiated</p> <p><input type="radio"/> Potential Cooperating Agency lacked special expertise and jurisdiction by law</p> <p><input type="radio"/> Potential Cooperating Agency lacked authority to enter into an agreement to be a Cooperating Agency</p> <p><input type="radio"/> Potential or active Cooperating Agency lacked agreement with the agency (e.g., unable to accept the scope of the analysis or the purpose and need for the proposed action; unable to accept responsibilities and/or milestones for analysis and documentation; unable to develop information/analysis of all reasonable alternatives; unable to prevent release of predecisional information; misrepresents the process or the findings presented in the analysis and documentation)</p> <p><input type="radio"/> Potential or active Cooperating Agency lacked capacity (training or resources) to participate (e.g., unable to participate during scoping and/or throughout the preparation of the analysis and documentation as necessary to meet process milestones; unable to identify significant issues, eliminate minor issues, identify issues previously studied, or identify conflicts with the objectives of regional, State and local land use plans, policies and controls in a timely manner; unable to assist in preparing portions of the review and analysis and help resolve significant environmental issues in a timely manner; unable to provide resources to support scheduling and critical milestones)</p> <p><input checked="" type="radio"/> Other</p>	
<p>Explain "Other"</p> <div><p>The American Rescue Plan Act funding is not subject to the environmental review requirements. Therefore, a formal CAA for this and subsequent City of Detroit HUD environmental reviews is not required.</p></div>	
<p>Insert the name(s) of any Agency or agencies contacted:</p> <div><p>N/A</p></div>	

- If federal funding outside of HUD is utilized in the project (i.e. ARPA, DOT, etc.), then the Cooperating Agency screen will appear in HEROS.

# Project Justification (EA Reviews Only)

## Purpose and Need

Provided by the Developer. Must be thorough.

- **Purpose** – Discuss the purpose the project is going to serve
  - i.e. construction of new housing or rehabbing blighted homes
- **Need** – Discuss how the proposed action is going to address housing and/or community development needs
  - i.e. providing housing in an area with a shortage of affordable housing or improving a blighted housing block

## Existing Conditions and Trends

Provided by the Developer, usually in the market study. Must be thorough.

- What type of developments are in the area (residential housing, commercial, mix of residential and commercial, etc.)
- Discuss what trends would continue if the project does not occur
- Use census data



# Common Issues: Project Justification

- Not enough information about why the project is needed
- Existing Trends & Conditions does not describe the project area and its surroundings and/or does not discuss what would happen to the project area if the project does not occur

# **Components of the HUD Part 58 Environmental Review**

**Related Laws and Authorities**

# Laws & Authorities: 24 CFR Part 58.5 & 58.6

## Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

<b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6</b>		
<b>Airport Hazards</b>  24 CFR Part 51 Subpart D	Yes No <input type="checkbox"/> <input type="checkbox"/>	
<b>Coastal Barrier Resources</b>  Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes No <input type="checkbox"/> <input type="checkbox"/>	
<b>Flood Insurance</b>  Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes No <input type="checkbox"/> <input type="checkbox"/>	
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 &amp; 58.5</b>		
<b>Clean Air</b>  Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes No <input type="checkbox"/> <input type="checkbox"/>	
<b>Coastal Zone Management</b>  Coastal Zone Management Act, sections 307(c) & (d)	Yes No <input type="checkbox"/> <input type="checkbox"/>	
<b>Contamination and Toxic Substances</b>	Yes No <input type="checkbox"/> <input type="checkbox"/>	

24 CFR Part 50.3(i) & 58.5(i)(2)		
<b>Endangered Species</b>  Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes No <input type="checkbox"/> <input type="checkbox"/>	
<b>Explosive and Flammable Hazards</b>  24 CFR Part 51 Subpart C	Yes No <input type="checkbox"/> <input type="checkbox"/>	
<b>Farmlands Protection</b>  Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes No <input type="checkbox"/> <input type="checkbox"/>	
<b>Floodplain Management</b>  Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes No <input type="checkbox"/> <input type="checkbox"/>	
<b>Historic Preservation</b>  National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes No <input type="checkbox"/> <input type="checkbox"/>	
<b>Noise Abatement and Control</b>  Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	Yes No <input type="checkbox"/> <input type="checkbox"/>	
<b>Sole Source Aquifers</b>  Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	Yes No <input type="checkbox"/> <input type="checkbox"/>	
<b>Wetlands Protection</b>  Executive Order 11990, particularly sections 2 and 5	Yes No <input type="checkbox"/> <input type="checkbox"/>	
<b>Wild and Scenic Rivers</b>  Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes No <input type="checkbox"/> <input type="checkbox"/>	
<b>ENVIRONMENTAL JUSTICE</b>		



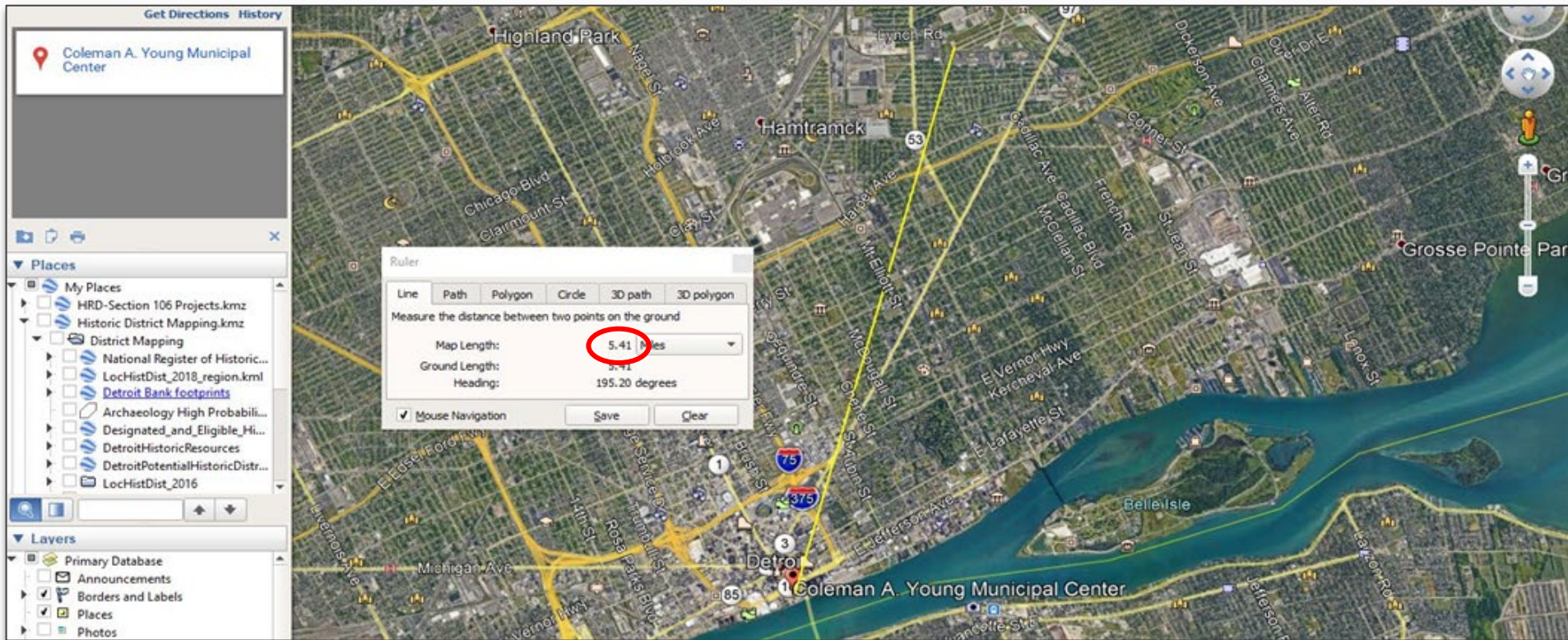
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# Airport Hazards – Exempt/CENST

- Question 1: Project will not involve sale or acquisition of property - No
- Do not need to include map attachment



# Airport Hazards – CEST/EA



- Is your project within 15,000 feet (2.84 miles) of a military airport or 2,500 feet (0.47 miles) of a civilian airport?
  - No – Document with a map
  - Yes – Is your project located within an Accident Potential Zone or Runway Protection Zone?
- Use Google Earth or other mapping software to measure from end of the runway to the site “as the crow flies”
- Include measure from site to airports and indicate the distance to each airport.
- For more information, here is the link to the Airport Hazard page on the [HUD Exchange](#)



# Coastal Barrier Resources

- If your project is located in a Coastal barrier resource system, you have to consult with the US Fish & Wildlife Service regardless of level of review
  - For more information, visit the CBS page on the [HUD Exchange](#)
- For Exempt/CENST: Can upload map of City or map of location of building
- For CEST/EA: Map should indicate where the project is located
- The CBRS maps at the U.S. Fish & Wildlife Service have changed!
  - Generate a site-specific map of the site or the county using [this link](#)



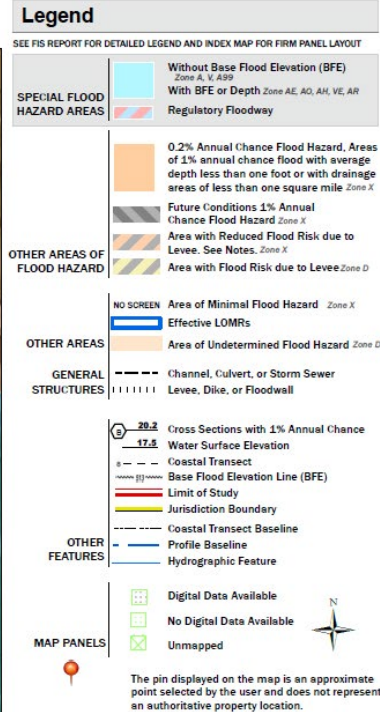
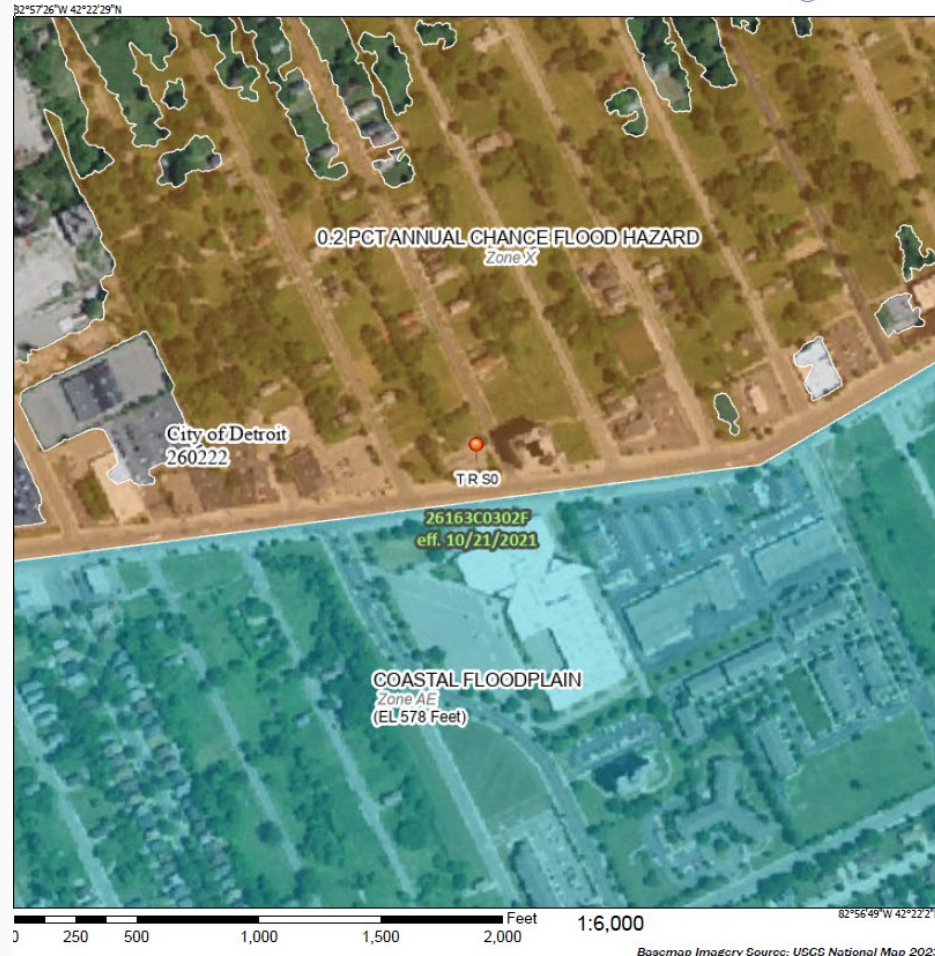
# Flood Insurance – Exempt/CENST Reviews

- Question 1: Does this project involve mortgage insurance, refinance, acquisition, repairs, rehab or construction of a structure, mobile home, or insurable personal property? – No
- Question 4: It is up to the RE if they want to include flood insurance as a mitigation measure or condition
  - The City of Detroit does not require insurance for Exempt/CENST reviews
- Summary can be left as-is;
  - However, the City of Detroit normally removes the sentence, “While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP).”



# Flood Insurance

## National Flood Hazard Layer FIRMette

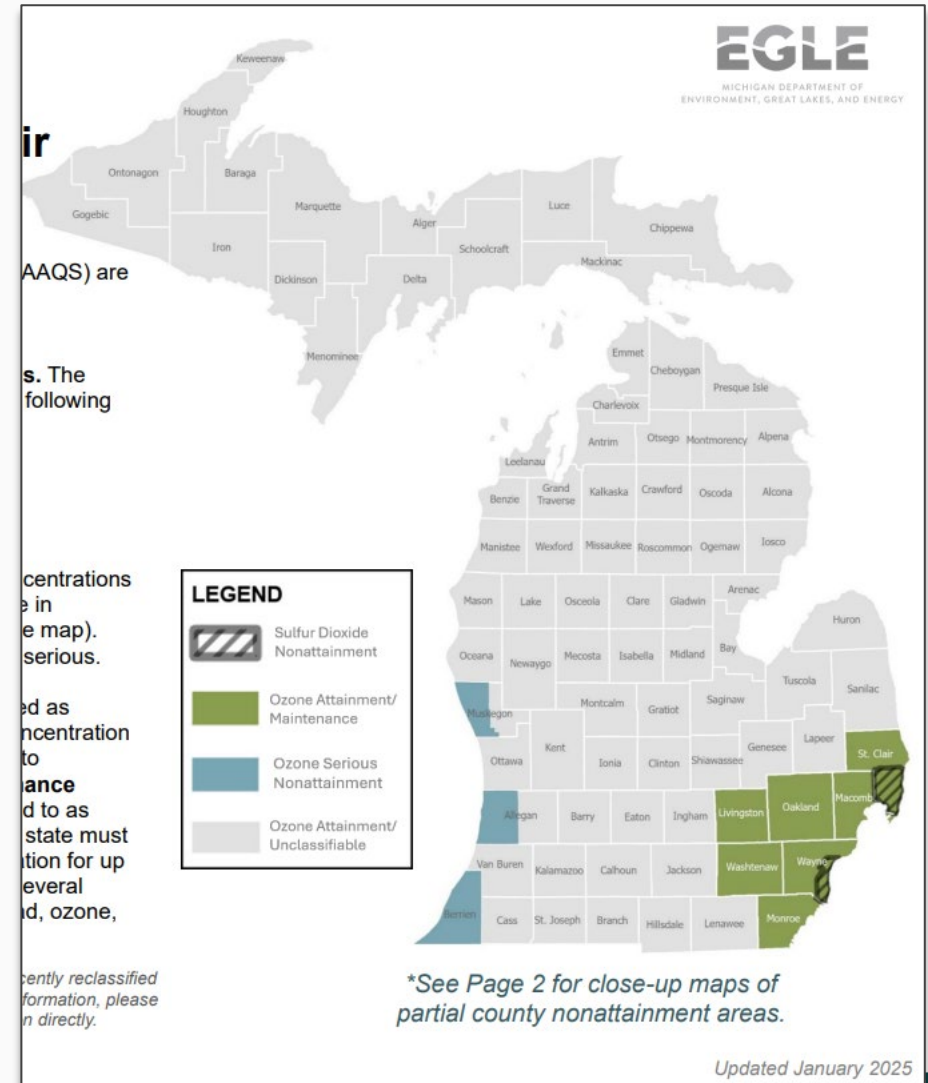


- Important: If the project is in the Special Flood Hazard Area (SFHA), any current or future structures located in the SFHA will need flood insurance for the life of the building irrespective of the transfer of ownership – Zone A, AE
- Summary must include the map identification number, the effective date and the zone type in the project summary
- Obtain FIRMette map from FEMA using this [link](#)
- For more information, visit the Flood Insurance page on the [HUD Exchange](#)



# Clean Air

- Wayne County (including the City of Detroit) in a **maintenance area** for Ozone and part of the County is in the non-attainment area for Sulfur Dioxide
- If the project does not involve new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units, further analysis is not required.
- RE can obtain air quality maps from EPA or their state environmental governing body if available



Updated January 2025

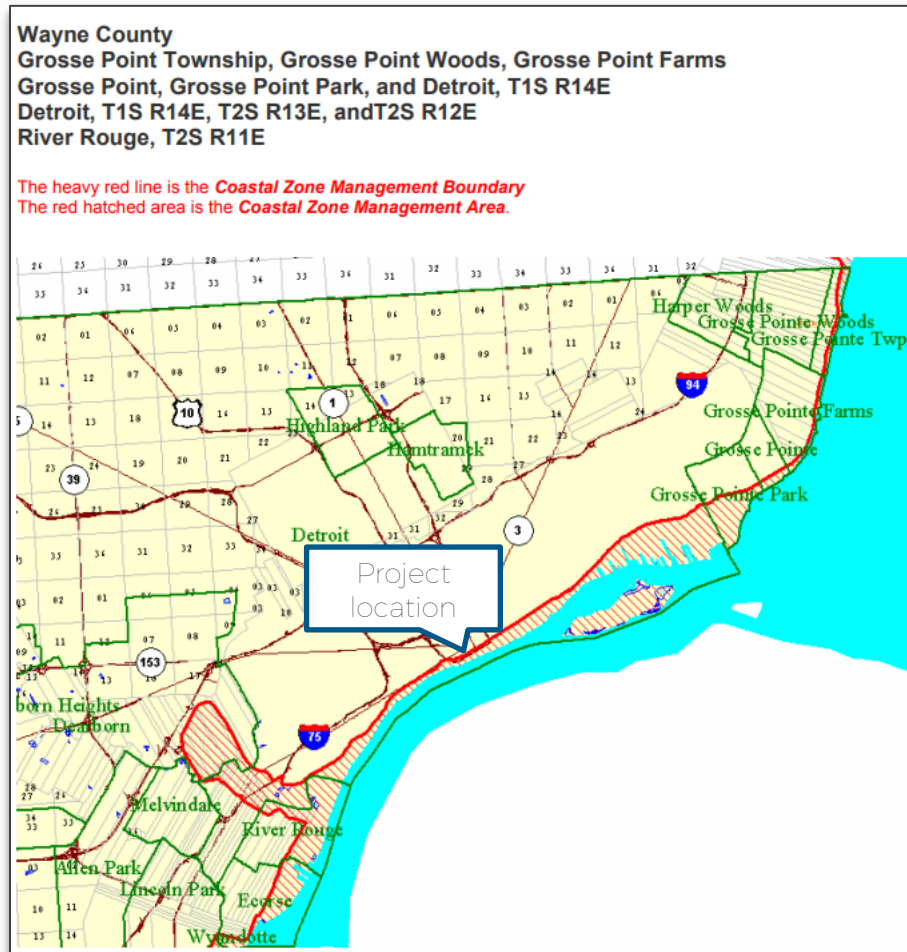


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# Clean Air

- If the project scope does include construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units, Preparer must:
  - Determine the de minimis levels or screening levels
    - Can use EPA De Minimis Table or site other sources in the review
    - <https://www.epa.gov/general-conformity/de-minimis-tables>
  - Determine the estimated emissions levels from the project
    - The City asks for a letter of concurrence letter from the Air Quality Division at our state environmental organization the Michigan Department of the Environment, Great Lakes, and Energy (EGLE) on the project description not adding impact to the Ozone maintenance area and potentially Sulfur Dioxide non-attainment zone
  - Attach non-attainment map, De Minimis Levels source page, and other relevant documentation (i.e. concurrence letter)
  - For more information, see the Air Quality page on the [HUD Exchange](#)

# Coastal Zone Management



- Obtain a map from the EPA or state environmental governing body if available
- Map should indicate where the project is located
- If your project is located in the CZM, you will need additional documentation from the state Coastal Management Program
- For more information, here is the link to the Coastal Zone Management page on the [HUD Exchange](#)

# Contamination and Toxic Substances

- For most tiered reviews and CEST level reviews that do not involve earth disturbance, a Phase I ESA in accordance with ASTM E 1527-21 is not required
- Obtain maps from NEPAassist, the EPA, or state environmental governing body
  - If contamination is shown on maps on site or adjacent to site, determine next steps
- Attach maps at the bottom of the HEROS page and provide a summary of the findings of the maps

# Contamination and Toxic Substances

- **For all multi-family and large projects, a Phase I ESA will be required**
  - Conduct the Phase I ESA according to ASTM E 1527-21
    - A qualified consultant needs to complete the Phase I
    - If the determination is the site has no Recognized Environmental Conditions (REC's), include in the Summary Section that (a) Phase I Environmental Site Assessments (ESA's) was/were completed for the site, list the date(s) of the report(s), and state that no REC's were identified.
    - If REC's are present, summarize the findings of the report in the summary section and attach the report

# Contamination and Toxic Substances

- If the Phase I has REC's, a Phase II ESA is required
  - A qualified consultant needs to complete the Phase II
  - Phase II ESA field work may require consultation with the RE before finalizing the scope of work
  - Discuss if vapor was considered and if there is a potential vapor encroachment issue
- If no contamination above state criteria was found, summarize the findings of the report in the summary section and attach the report

# Contamination and Toxic Substances

- For Sites that are considered contaminated:
  - HUD requires that any contamination above residential criteria has a state agency approved plan to mitigate exposure to residents
  - Some HUD regulations will require a “Clean Site” and “No Further Action” letter from agency
- In Michigan:
  - Further Site Characterization may be required to adequately assess the potential exposure pathways.
  - Ultimately, EGLE should be satisfied with the Site Characterization scope of work, or may require further assessment and additional sampling prior to approval of the ResAP
  - **The City of Detroit cannot complete the Environmental Review Record without the State Agency approval letter for the required corrective actions**

# Contamination and Toxic Substances

HUD Part 50 reviews (221d4 reviews and others) would require consultation with HUD to determine if a No Further Action letter is required

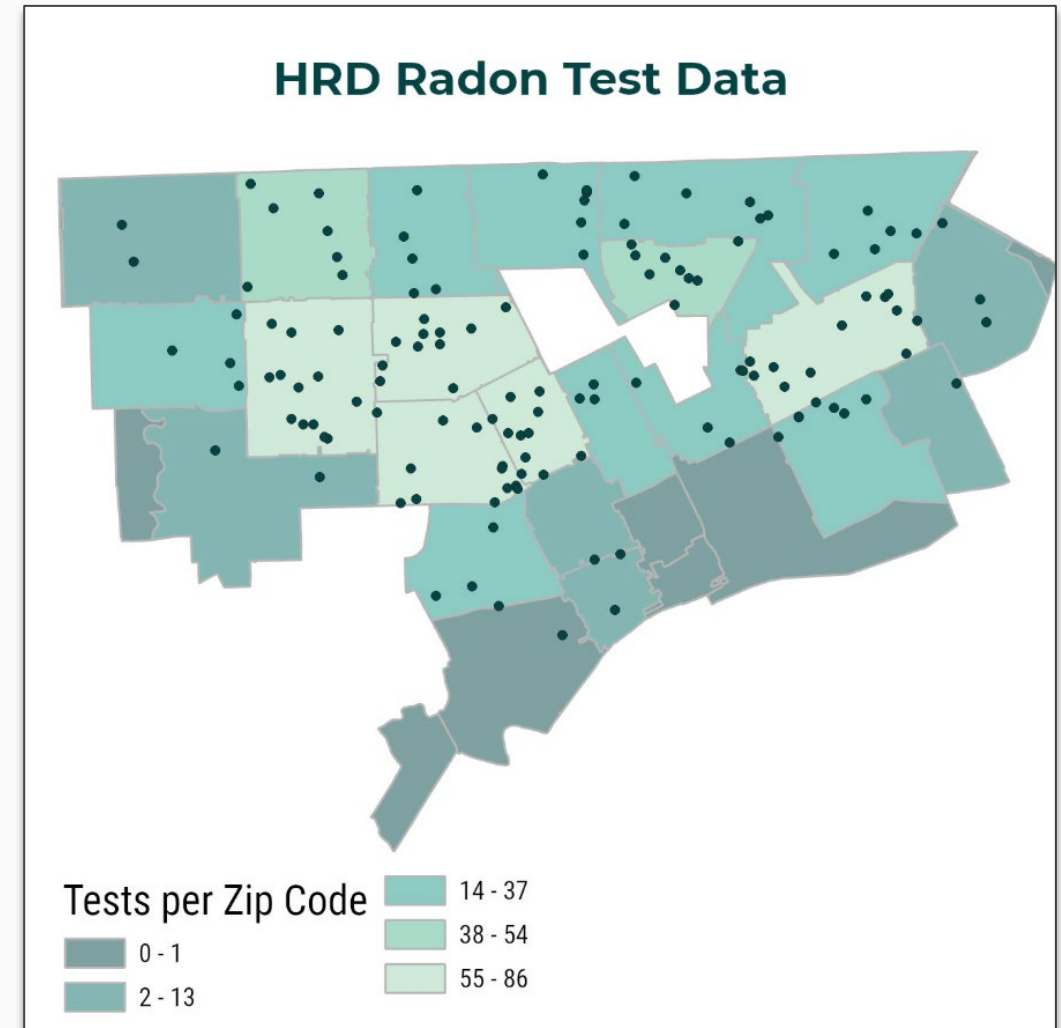


## Question 3:

How does your state mitigate contamination?


# Contamination and Toxic Substances

- HUD's policy on radon has changed
- Each site needs to be reviewed for the potential impact from radon
- The City of Detroit has elected to use scientific data review from tests taken throughout the City. The average results of the tests are 0.74 pCi/L.
  - Therefore, the City does not require radon testing for development projects
- However, municipalities that do not have data available to test out may require radon testing
  - Radon mitigation may be required
- For more information, see the radon page on the [HUD Exchange](#)



## Answer to HEROS Question 6

“Per the HUD CPD-23-103 Policy for Addressing Radon, the City of Detroit has elected to follow Consideration III A ii. 3) Scientific Data Review to determine whether the project site is located in an area that has average documented radon levels at or above 4 pCi/L. The Housing and Revitalization Department (HRD) has collected radon samples throughout the City of Detroit. According to the HRD Indoor Radon Map, the City is in a geographic area with radon under the levels suggested for mitigation. Since November 2023, fifty-nine (59) tests were taken throughout the City. The average results of the tests are 0.74 pCi/L. Based on the samples taken in the City and the results averaging under 4 pCi/L, no additional testing is required.”

3. Evaluate the building(s) for radon. Do all buildings meet any of the exemptions  from having to consider radon in the contamination analysis listed in CPD Notice CPD-23-103?

☐ Yes  
☒ No

4. Is the proposed project new construction or substantial rehabilitation where testing will be conducted but cannot yet occur because building construction has not been completed?

☐ Yes  
☒ No


5. Was radon testing or a scientific data review conducted that provided a radon concentration level in pCi/L?

☒ Yes  
☐ No


6. How was the data collected?

☐ All buildings involved were tested for radon  
☒ A review of science-based data was conducted

Enter the Radon concentration value, in pCi/L, derived from the review of science-based data:

Provide the documentation  used to derive this value:

Per the HUD CPD-23-103 Policy for Addressing Radon, the City of Detroit has elected to follow Consideration III A ii. 3) Scientific Data Review to determine whether the project site is located in an area that has average documented radon levels at or above 4 pCi/L. The Housing and Revitalization Department (HRD) has collected radon samples throughout the City of Detroit. According to the HRD Indoor Radon Map, the City is in a geographic area with radon under the levels suggested for mitigation.

File Upload:  

HRD Indoor Radon Map 04-18-24.pdf

Based on the response, the review is in compliance with this section. Continue to the Screen Summary at the bottom of this screen.

# Contamination and Toxic Substances

- Demolition requires an asbestos survey and hazardous materials survey
- Renovation requires an asbestos and lead inspection risk assessment (LIRA) surveys
- These must be completed before EA is submitted to the City

# Contamination and Toxic Substances

- Required information for the Summary section:
  - A list of all reports, including report type and dates completed
  - A brief summary of the findings of due diligence reports
  - A brief discussion about the response activities that will be completed (if applicable)
  - A summary of the findings of the lead and asbestos reports (if applicable)
  - A summary for radon determination
- **Make sure the summary is thorough and detailed! Contamination is one of the more challenging compliance aspects of HUD Environmental Review in areas that have been redeveloped**
- For more information, here is the link to the Site Contamination page on the HUD Exchange

# Endangered Species



The screenshot shows the US Fish & Wildlife Service website for the Midwest Region Endangered Species. The header includes the USFWS logo and the text "U.S. Fish & Wildlife Service". The main title is "Midwest Region Endangered Species". Below the title is a search bar and social media icons for Facebook, Twitter, YouTube, and RSS. The left sidebar contains a navigation menu with links to "In the Midwest", "USFWS Midwest", "Midwest Ecological Services", "Contact Us", "Section 7 Consultation", "Midwest Endangered Species Home", "Section 7 Home", "Section 7: A Brief Explanation", "Section 7: Technical Assistance", "Biological Assessment Guidance", "Section 7 Consultation Handbook", and "Contact Us". The main content area is titled "S7 Consultation Technical Assistance" and "Decision Process for 'No Effect' Determinations". It includes a section for "Projects within a Developed Area - Step 5" and "Step 5: 'No Effect' Determination and Documentation". The text explains that a "no effect" determination is appropriate for projects within a Developed Area (already paved or supporting structures) or not within or adjacent to unlandscaped areas. It also provides instructions on how to document the section 7 review and "no effect" determination, including a link to a "species list" and a "Back Home" link.

U.S. Fish & Wildlife Service

## Midwest Region Endangered Species

Search

[In the Midwest](#)

[USFWS Midwest](#)

[Midwest Ecological Services](#)

[Contact Us](#)

**Section 7 Consultation**

[Midwest Endangered Species Home](#)

[Section 7 Home](#)

[Section 7: A Brief Explanation](#)

[Section 7: Technical Assistance](#)

[Biological Assessment Guidance](#)

[Section 7 Consultation Handbook](#)

[Contact Us](#)

### Endangered Species Program

The mission of the U.S. Fish and Wildlife Service's Endangered Species program is conserving and restoring threatened and endangered species and their ecosystems.

## S7 Consultation Technical Assistance

### Decision Process for "No Effect" Determinations

#### Projects within a Developed Area - Step 5

#### Step 5: "No Effect" Determination and Documentation

Your project will have "no effect" on federally listed species. A "No Effect" determination is appropriate because your project is:

- within a Developed Area (an area that is already paved or supports structures and the only vegetation is limited to frequently mowed grass or conventional landscaping), and
- is not within or adjacent to any unlandscaped areas that support native vegetation (trees, shrubs, or grasses).

Since your project is not within suitable habitat for listed species, no listed species or designated critical habitat is anticipated to be directly or indirectly affected by this action.

To document your section 7 review and "no effect" determination, we recommend that you print this page (go to [File > Print Preview](#)), fill-in the project name and date, attach your [species list](#), and file in your administrative record.

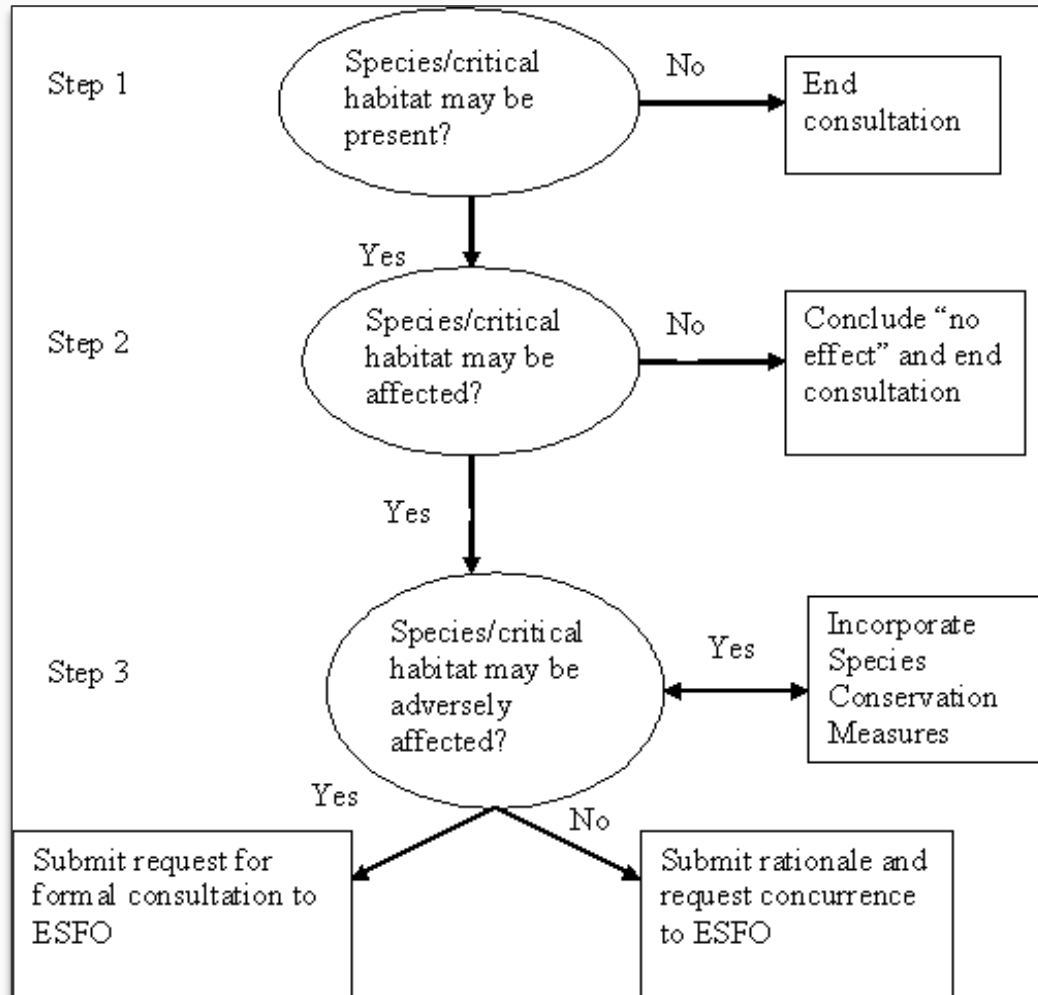
**Project Name:**

**Date:**

[Back Home](#) - "No Effect" Determination Process

- Obtain a species list from the US Fish & Wildlife Service's (USFWS) website and determine if Threatened & Endangered (T&E) species are present, may be present, or are not present
- The City of Detroit is in the highly urbanized area that has been re-developed multiple times. Additionally, most projects are located away from potential species habitat (rivers, wetlands, etc.). Therefore, the City has determined most project will have no effect on T&E species
- However, depending on your municipality's location, scope of project work, and/or T&E species in the project area, informal consultation may be necessary using the USFWS Information for Planning and Consultation (IPaC) program

# Endangered Species



- If the project may affect a listed species or critical habitat, they must begin formal consultation unless the agency & Service confirm it is not likely to adversely affect
- For further information about the Section 7 process, see this link to the [USFWS site](#)
- To acquire a species list form, use the US F&WS Information for Planning and Consultation [IPaC site](#)
- For more information, here is the link to the Endangered Species page on the [HUD Exchange](#)

# Explosive and Flammable Hazards

There are potentially three questions you must answer in HEROS:

- Question 1: Is the proposed HUD-assisted project itself the development of a hazardous facility a facility that mainly stores, handles or processes combustible chemicals such as bulk fuel storage facilities and refineries?
  - None of our projects have fallen under this category; however, if they do, you must calculate the Acceptable Separation Distance (ASD) to ensure the site is an acceptable separation distance from residences and any other facility or area where people may congregate or be present
  - If not, this will require mitigation
- Question 2: Does the project include development, construction, rehabilitation that will increase residential densities, or conversion?
  - If not, include a completed Explosives HUD Partner Worksheet as an attachment (link)
  - If so...

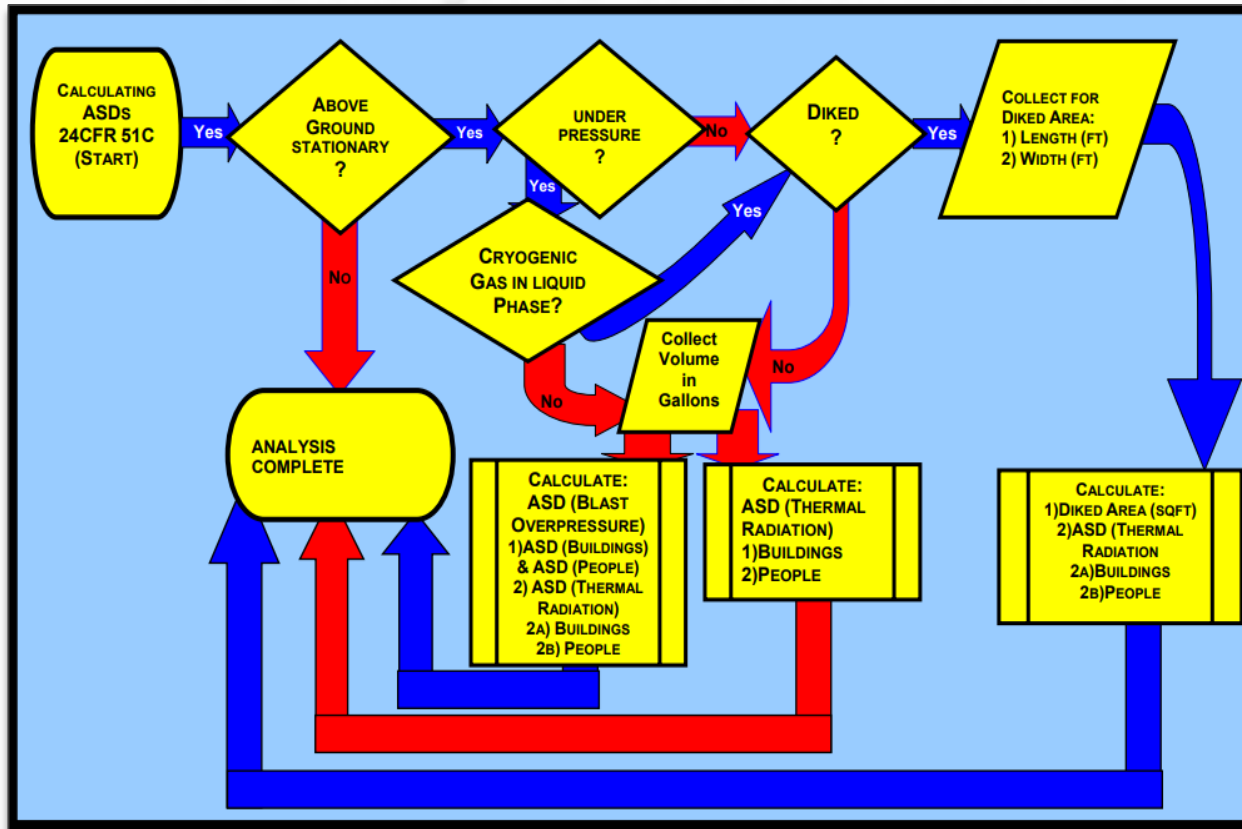


# Explosive and Flammable Hazards

- Question 3: Within 1 mile of the project site, are there any current or planned stationary above ground storage containers covered by 24 CFR 51C?
  - This does not include:
    - Containers 100 gallons or less in capacity, containing common liquid industrial fuels, OR
    - Containers of liquefied gas or propane with a water volume capacity of 1,000 gallons or less that meet the requirements of the 2017 or later version of the NFPA Code 58
  - Information can be found in the environmental database of the Phase I ESA, through the fire department, or viewed on aerials
  - If no tanks exist, provide a map and documentation that shows the site is not within a mile of an AST

# Explosive and Flammable Hazards

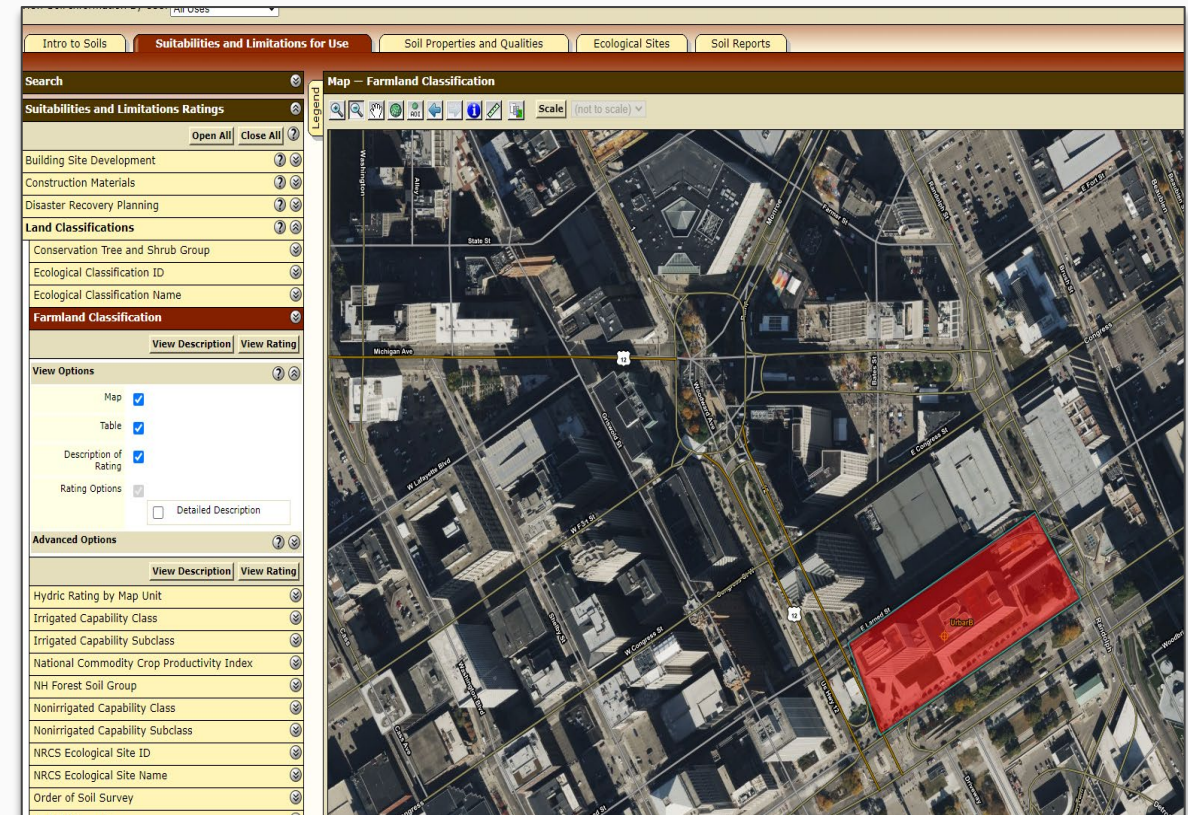
HUD Exchange ASD Calculation Flowchart



- If containers exist within a one-mile radius of the site and they contain a flammable or explosive liquid, calculate each tanks' ASD from each tank to the site using this [link](#)
  - For further information about HUD's tool, you can access the assessment tool guide [here](#)
- If the ASD is not met, mitigation is required. Contact the ER Team to discuss next steps
- If the ASD is met, attach a map that shows the location of the tanks, the distance from the site to the tanks, and any additional calculations (if applicable)
- For more information, here is the link to the Explosives and Flammable Facilities page on the [HUD Exchange](#)

# Farmlands Protection

- Obtain documentation from USDA Web Soil Survey using this [link](#)
- There are other options for this data – just make sure that there is documentation to back up the urban land determination
- For more information, here is the link to the Farmland Protection page on the [HUD Exchange](#)

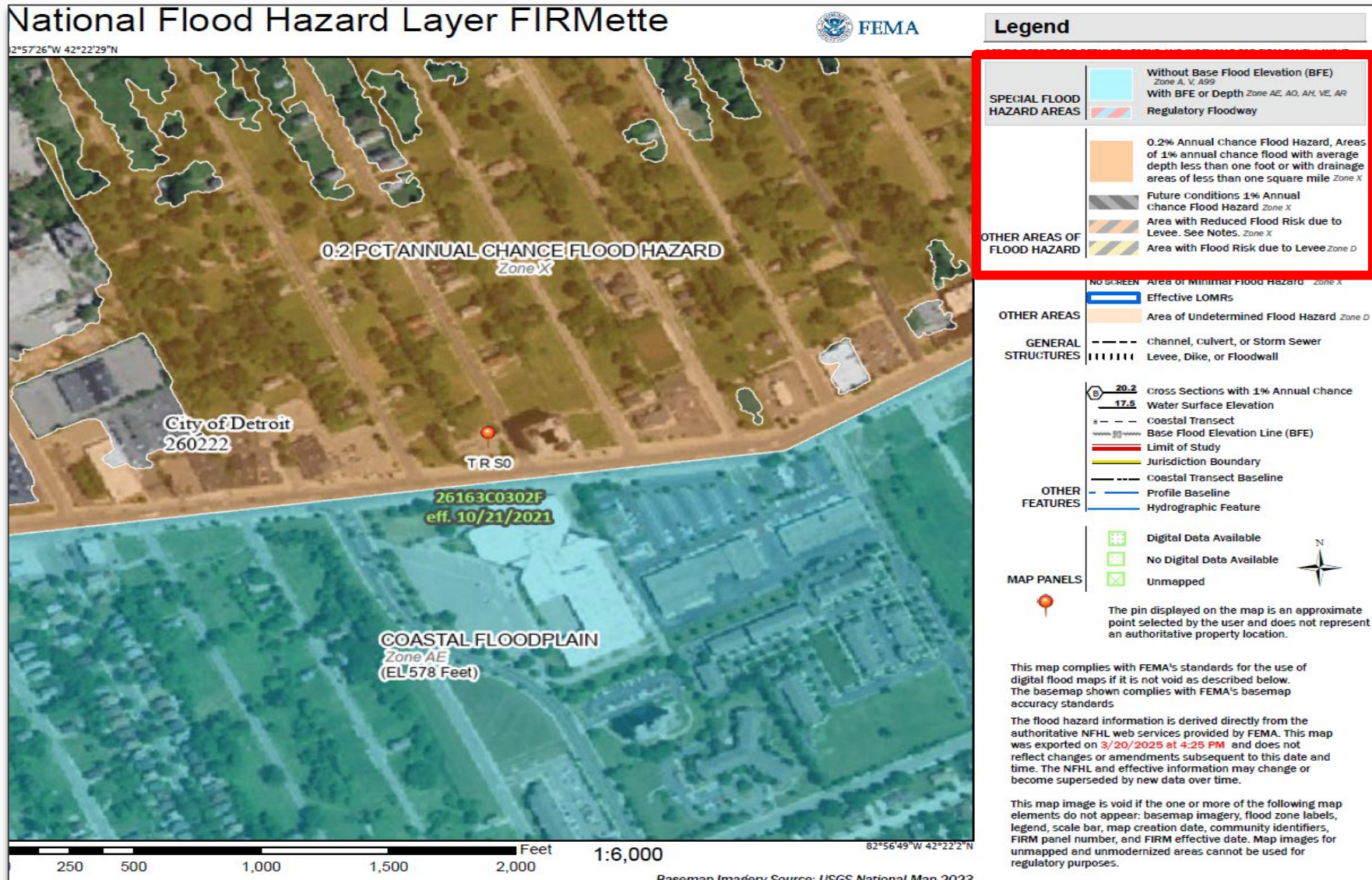


# Floodplain Management

- HUD has recently revised its Floodplain Rule and defines a new floodplain of concern: the Federal Flood Risk Management Standard (FFRMS) floodplain
  - The FFRMS floodplain includes the 1% and 0.2% annual chance floodplain, or the 100-year and 500-year floodplain
    - **This means new construction and substantial rehabilitation projects in the 500-year floodplain must complete the Eight-Step Process**
- There are three options for identifying and defining the FFRMS floodplain
- Preparers should obtain the FIRM map upon receiving notification of the project to determine if the site is in the floodplain
  - **If the site is in the FFRMS floodplain, notify the developer immediately**



# Floodplain Management



# Floodplain Management

- Hiring a floodplain specialist to complete the eight-step process is highly recommended as this process requires expertise to complete, including designing mitigation measures, submitting State or federal permits, and potentially submitting documents to FEMA to remove the site from the FFRMS floodplain
- For more information, see the Floodplain page on the [HUD Exchange](#)

# Floodplain Management

## 3. Determine the extent of the FFRMS floodplain and provide mapping documentation in support of that determination.

The extent of the FFRMS floodplain can be determined using a Climate Informed Science Approach (CISA), 0.2 percent flood approach (0.2 PFA), or freeboard value approach (FVA). For projects in areas without available CISA data or without FEMA Flood Insurance Rate Maps (FIRMs), Flood Insurance Studies (FISs) or Advisory Base Flood Elevations (ABFEs), use the best available information ❶ to determine flood elevation. Include documentation and an explanation of why this is the best available information ❷ for the site. Note that newly constructed and substantially improved structures ❸ must be elevated to the FFRMS floodplain regardless of the approach chosen to determine the floodplain.

### Select one of the following three options:

- ☐ CISA for non-critical actions. If using a local tool, data, or resources, ensure that the FFRMS elevation is higher than would have been determined using the 0.2 PFA or the FVA.
- ☒ 0.2-PFA. Where FEMA has defined the 0.2-percent-annual-chance floodplain, the FFRMS floodplain is the area that FEMA has designated as within the 0.2-percent-annual-chance floodplain.
- ☐ FVA. If neither CISA nor 0.2-PFA is available, for non-critical actions, the FFRMS floodplain is the area that results from adding two feet to the base flood elevation as established by the effective FIRM or FIS or — if available — a FEMA-provided preliminary or pending FIRM or FIS or advisory base flood elevations, whether regulatory or informational in nature. However, an interim or preliminary FEMA map cannot be used if it is lower than the current FIRM or FIS.

Continue to FFRMS Floodplain Question.

## 5. Does your project occur in the FFRMS floodplain?

☒ Yes

Continue to FFRMS Floodplain Category Question.

☐ No

## 6. Is your project located in any of the floodplain categories below?

Select all that apply:

- ☐ Floodway.
- ☐ Coastal High Hazard Area (V Zone) or Limit of Moderate Wave Action (LiMWA).
- ☒ None of the above.

Continue to the 8-Step Process Question.

## 7. Does the 8-Step Process apply? Select one of the following options:

- ☐ 8-Step Process is inapplicable per 55.13.
- ☐ 5-Step Process is applicable per 55.14.
- ☒ 8-Step Process applies.

Provide a completed 8-Step Process in the Screen Summary below, including the early public notice and the final notice. Continue to Mitigation Question.



**TAKE PART**  
Opportunity Rising

# Floodplain Management

## 8. Mitigation

For the project to comply with this section, all adverse impacts must be mitigated. Explain in detail the measures that must be implemented to mitigate the impact or effect, including the timeline for implementation. Note: newly constructed and substantially improved structures within the FFRMS floodplain must be elevated to the FFRMS floodplain elevation or floodproofed, if applicable.

★Explain:

Which of the following if any mitigation/minimization measures have been identified for this project in the 8-Step or 5-Step Process? Select all that apply:

- ☐ Buyout and demolition or other supported clearance of floodplain structures.
- ☐ Insurance purchased in excess of statutory requirement under the Flood Disaster Protection Act of 1973.
- ☐ Permeable surfaces.
- ☐ Natural landscape enhancements that maintain or restore natural hydrology.
- ☐ Planting or restoring native plant species.
- ☐ Bioswales.
- ☐ Stormwater capture and reuse.
- ☐ Green or vegetative roofs with drainage provisions.
- ☐ Natural Resources Conservation Service conservation easements or similar easements.
- ☐ Floodproofing of structures as allowable (e.g. non-residential floors).
- ☐ Elevating structures (including freeboard above the required base flood elevations).
- ☐ Levee or structural protection from flooding.
- ☐ Channelizing or redefining the floodway or floodplain through a Letter of Map Revision (LOMR).



# Historic Preservation in HEROS

- Not one size fits all
- The HEROS entry will look different depending on response to the question: Is Section 106 review required for your project?
  - No, because the project consists solely of activities listed as exempt in a Programmatic Agreement
  - No, because the project consists solely of activities included in a No Potential to Cause Effects memo or other determination [36 CFR 800.3(a)(1)]
  - Yes, because the project includes activities with potential to cause effects (direct or indirect).

# Historic Preservation in HEROS: Step 1

Is Section 106 review required for your project?

☐ No, because the project consists solely of activities listed as exempt in a Programmatic Agreement (PA) (See the [PA Database](#) to find applicable PAs).

☐ No, because the project consists solely of activities included in a No Potential to Cause Effects memo or other determination [36 CFR 800.3(a)(1)].

☒ Yes, because the project includes activities with potential to cause effects (direct or indirect).

The Section 106 Process [🔗](#):

After determining the need to do a Section 106 review, initiate consultation with regulatory and other interested parties, identify and evaluate historic properties, assess effects of the project on properties listed on or eligible for the National Register of Historic Places, and resolve any adverse effects through project design modifications or mitigation. Note that consultation continues through all phases of the review.

Step 1: Initiate consultation  
Step 2: Identify and evaluate historic properties  
Step 3: Assess effects of the project on historic properties  
Step 4: Resolve any adverse effects

**Step 1 - Initiate Consultation**

The following parties are entitled to participate in Section 106 reviews: Advisory Council on Historic Preservation; State Historic Preservation Officers (SHPOs); federally recognized Indian tribes/Tribal Historic Preservation Officers (THPOs); Native Hawaiian Organizations (NHOs); local governments; and project grantees. The general public and individuals and organizations with a demonstrated interest in a project may participate as consulting parties at the discretion of the RE or HUD official. Participation varies with the nature and scope of a project. Refer to [HUD's website](#) for guidance on consultation, including the required timeframes for response. Consultation should begin early to enable full consideration of preservation options.

Use the [When To Consult With Tribes checklist](#) within Notice CPD-12-006: Process for Tribal Consultation to determine if you should invite tribes to consult on a particular project. Use the [Tribal Directory Assessment Tool \(TDAT\)](#) to identify tribes that may have an interest in the area where the project is located. Note that consultants may not initiate consultation with Tribes.

Select all consulting parties below (check all that apply):

☐ State Historic Preservation Officer (SHPO) Status: \*

☐ Advisory Council on Historic Preservation Status: \*

☐ Indian Tribes including Tribal Historic Preservation Officers (THPOs) or Native Hawaiian Organizations (NHOs)  
Consult the [When To Consult With Tribes checklist](#), and upload completed checklist in the Screen Summary at the conclusion of this screen.  
Name:  Status: \*

☐ Other Consulting Parties

Upload all correspondence, notices, and notes (including comments and objections received) in the Screen Summary at the conclusion of this screen.

\*Describe the process of selecting consulting parties and initiating consultation here:

- SHPO consultation
- ACHP consultation- not typically required unless there is a dispute or adverse effect
- Include all tribes identified in the Tribal Directory Assessment Tool (TDAT)
  - RE is responsible for tribal consultation and should provide relevant documentation to consultants for this entry

\*Process for selecting consulting parties: “The City of Detroit Housing & Revitalization Department has reviewed this project under a Programmatic Agreement (PA) between the Michigan State Historic Preservation Office (SHPO) and the City of Detroit, Michigan dated December 21, 2022. Consulting parties were identified in the development of the PA. The City has conducted consultation with relevant stakeholders and tribes identified in the TDAT system as required.”

# Historic Preservation in HEROS: Step 2

Step 2 - Identify and Evaluate Historic Properties

1. Define the Area of Potential Effect (APE [?](#)), either by entering the address(es) or uploading a map depicting the APE in the Screen Summary at the conclusion of this screen:

Gather information about known historic properties in the APE. Historic buildings, districts and archeological sites may have been identified in local, state, and national surveys and registers, local historic districts, municipal plans, town and county histories, and local history websites. If not already listed on the National Register of Historic Places, identified properties are then evaluated to see if they are eligible for the National Register. Refer to [HUD Exchange](#) for guidance on identifying and evaluating historic properties.

In the chart below, list historic properties identified and evaluated in the APE. Every historic property that may be affected by the project should be included in the chart.

Upload the documentation (survey forms, Register nominations, concurrence(s) and/or objections, notes, and photos) that justify your National Register Status determination in the Screen Summary at the conclusion of this screen. [?](#)

Address <a href="#">?</a> Location/District	National Register Status	SHPO Concurrence	Sensitive Information
<div></div>	(not set) <a href="#">?</a>	(not set) <a href="#">?</a>	<input type="checkbox"/> Do not release
<div></div>	(not set) <a href="#">?</a>	(not set) <a href="#">?</a>	<input type="checkbox"/> Do not release
<div></div>	(not set) <a href="#">?</a>	(not set) <a href="#">?</a>	<input type="checkbox"/> Do not release
<div></div>	(not set) <a href="#">?</a>	(not set) <a href="#">?</a>	<input type="checkbox"/> Do not release
<div></div>	(not set) <a href="#">?</a>	(not set) <a href="#">?</a>	<input type="checkbox"/> Do not release

Add Additional Locations

Additional notes:

★ 2. Was a survey of historic buildings and/or archeological sites done as part of the project? [?](#)

☒ Yes

Upload surveys and report(s) in the Screen Summary at the conclusion of this screen.

For Archeological surveys, refer to HP Fact Sheet #6, [Guidance on Archeological Investigations in HUD Projects](#)

Additional notes:

☐ No

## 1. Define Area of Potential Effect (APE)

- Historic resources identified in your APE must be included
  - Historic Districts are one entry
  - Include newly identified resources

## 2. Was a survey or report done?

- Yes, if a Section 106 application was submitted to SHPO it may be considered a survey

# Historic Preservation in HEROS: Step 3

**Step 3 - Assess Effects of the Project on Historic Properties**

Only properties that are listed on or eligible for the National Register of Historic Places receive further consideration under Section 106. Assess the effect(s) of the project by applying the Criteria of Adverse Effect. (36 CFR 800.5)

Consider direct and indirect effects as applicable as per guidance on **direct and indirect effects**.

☐ Check here if this information is sensitive and must remain confidential.

Choose one of the findings below - No Historic Properties Affected, No Adverse Effect, or Adverse Effect; and seek concurrence from consulting parties.

☐ No Historic Properties Affected

☒ No Adverse Effect

\*Document reason for finding:

Does the No Adverse Effect finding contain conditions?

☒ Yes (check all that apply)

☐ Avoidance

☐ Modification of project

☐ Other

\*Describe conditions here:

☐ No

☐ Adverse Effect

- “Check here if this information is sensitive and must remain confidential”
  - **This means archaeology!** Archaeological site locations are protected information. If you are uploading a report that contains a map with an archaeology site location, check this box. Alternatively, redact the document.
- Select appropriate determination as outlined in the 106 Determination Letter
- Does the finding contain conditions?
  - Outline any conditions outlined in the 106 Determination Letter (work completed photos, follow specific scope of work, etc.)

# Historic Preservation Screen Summary

Screen Summary

Compliance Determination

Describe the basis that led to your determination here, identifying all key elements from your support documentation that substantiate your determination. The following minimum language is based on your responses in this section. You are strongly encouraged to edit this language to provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

Supporting documentation

Upload all supporting documents required in this section here: 

Upload File

[Attachment J - Section 106 Letter.pdf](#) ✖

Are formal compliance steps or mitigation required?

Only Responsible Entity (for Part 58) or HUD (for Part 50) Users may respond to this question. Ensure that this question is complete before finalizing the review.

☒ Yes

☐ No

Save and Return to Summary

Cancel Review

- Compliance Determination
  - Pull this summary from the Section 106 Determination Letter
- Supporting Documentation
  - Upload the SHPO 106 Determination Letter
    - There may be multiple letters depending on how the project progressed
  - Section 106 Applications and associated survey reports,
  - Tribal consultation letters
  - Consultation e-mail/letters/notes and any other relevant documentation
- RE must select if formal compliance steps or mitigation is required

# Noise Abatement and Control

- Initially, use the HUD Exchange Day/Night Noise Level (DNL) Calculator using this [link](#) to determine the overall DNL based on selected Noise Assessment Level Location(s)
- Ensure you include all applicable noises sources in the calculation(s)
  - 1,000 feet of a major roadway, 3,000 feet of a railroad, or 15 miles of a military or FAA-regulated civil airfield
  - Use the next 10 years of noise projections to determine noise from the roadway
- If the project has an “acceptable” (<65 dB) noise level, no approvals are required.
  - Include a copy of the DNL calculator **and a map** depicting the location of the NAL’s.

Resources and assistance to support HUD's community partners

HUD EXCHANGE  
Secretary Ben Carson

My HUD Exchange Programs Resources Trainings Program Support

Home > Programs > Environmental Review > DNL Calculator

## DNL Calculator

**WARNING:** HUD recommends the use of Microsoft Internet Explorer for performing noise calculations. The HUD Noise Calculator has an error when using Google Chrome unless the cache is cleared before each use of the calculator. HUD is aware of the problem and working to fix it in the programming of the calculator.

The Day/Night Noise Level Calculator is an electronic assessment tool that calculates the Day/Night Noise Level (DNL) from roadway and railway traffic. For more information on using the DNL calculator, view the [Day/Night Noise Level Calculator Electronic Assessment Tool Overview](#).

### Guidelines

- To display the Road and/or Rail DNL calculator(s), click on the "Add Road Source" and/or "Add Rail Source" button(s) below.
- All Road and Rail input values must be positive non-decimal numbers.
- All Road and/or Rail DNL value(s) must be calculated separately before calculating the Site DNL.
- All checkboxes that apply must be checked for vehicles and trains in the tables' headers.
- Note #1:** Tooltips, containing field specific information, have been added in this tool and may be accessed by hovering over all the respective data fields (site identification, roadway and railway assessment, DNL calculation results, roadway and railway input variables) with the mouse.
- Note #2:** DNL Calculator assumes roadway data is always entered.

### DNL Calculator

Site ID

Record Date

User's Name

[Add Road Source](#) [Add Rail Source](#)

Airport Noise Level

Loud impulse Sounds? ☐ Yes ☒ No

Combined DNL for all Road and Rail sources

Combined DNL including Airport

Site DNL with Loud Impulse Sound

[Calculate](#)

### Mitigation Options

If your site DNL is in Excess of 65 decibels, your options are:

- No Action Alternative:** Cancel the project at this location
- Other Reasonable Alternatives:** Choose an alternate site
- Mitigation**
  - Contact your Field or Regional Environmental Officer
  - Increase mitigation in the building walls (only effective if no outdoor, noise sensitive areas)
  - Reconfigure the site plan to increase the distance between the noise source and noise-sensitive uses
  - Incorporate natural or man-made barriers. See [The Noise Guidebook](#)
  - Construct noise barrier. See the [Barrier Performance Module](#)

Tools and Guidance  
[Day/Night Noise Level Assessment Tool User Guide](#)  
[Day/Night Noise Level Assessment Tool Flowcharts](#)

# Noise Abatement and Control

- If your project has a “normally unacceptable” (65 – 75 dB) noise level, engage a license architect and incorporate noise attenuation measures into your project
  - This avoids formal mitigation for noise
- HUD’s Sound Transmission Classification Assessment Tool (STraCAT) must be used to determine if the amount of attenuation measures incorporated will reduce the interior DNL below 45 dB level enough to negate potential mitigation.
  - Explain in HEROS why formal mitigation will not be required.
- The summary should include a description of the NAL location(s), the initial DNL calculation, the attenuation measures that will be incorporated into the project to reduce the interior noise, and the final calculations
- Attach all calculations, the map of the NAL’s, the STraCAT, and other additional documents in the HEROS review

Resources and assistance to support HUD's community partners

HUD EXCHANGE  
Secretary Ben Carson

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Home > STraCAT

## Sound Transmission Classification Assessment Tool (STraCAT)

Part I - Description

Project:  Sponsor/Developer:

Location:  Prepared by:

Noise Level:  Date:  Primary Source(s):

Part II - Wall Components

Wall Construction Detail	Area	STC
<input type="button" value="Add new wall"/>	0 Sq. Feet	0

Window Construction Detail	Quantity	Sq Ft/Unit	STC
<input type="button" value="Add new window"/>			

Door Construction Detail	Quantity	Sq Ft/Unit	STC
<input type="button" value="Add new door"/>			

Part III - Results

Wall Statistics

Stat	Value
Area:	0 ft²
Wall STC:	0

Aperture Statistics

Aperture	Count	Area	% of wall
Windows:	0	0 ft²	0%
Doors:	0	0 ft²	0%

Evaluation Criteria

Criteria	Value
Noise source sound level(dB):	0
Combined attenuation for wall component:	0 dB
Required attenuation:	0
Do Wall components meet requirements?	<input type="button" value="Yes"/>

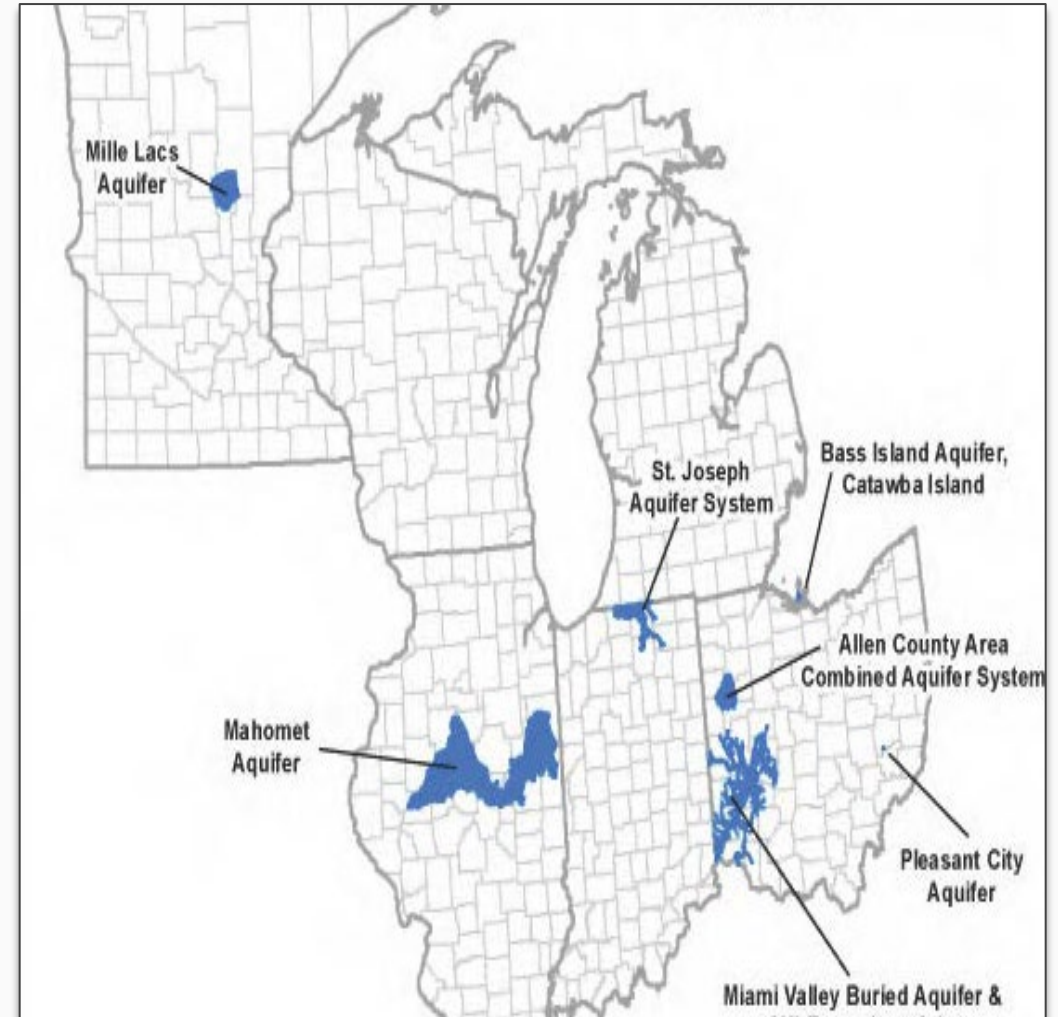
# Noise Abatement and Control

- If the project has an “unacceptable” (76+ dB), the project will be elevated to an Environmental Impact Statement and attenuation requirements for new construction must be approved by the Assistance Secretary of CPD or the Certifying Officer
- For more information, here is the link to the Noise Abatement and Control page on the [HUD Exchange](#)

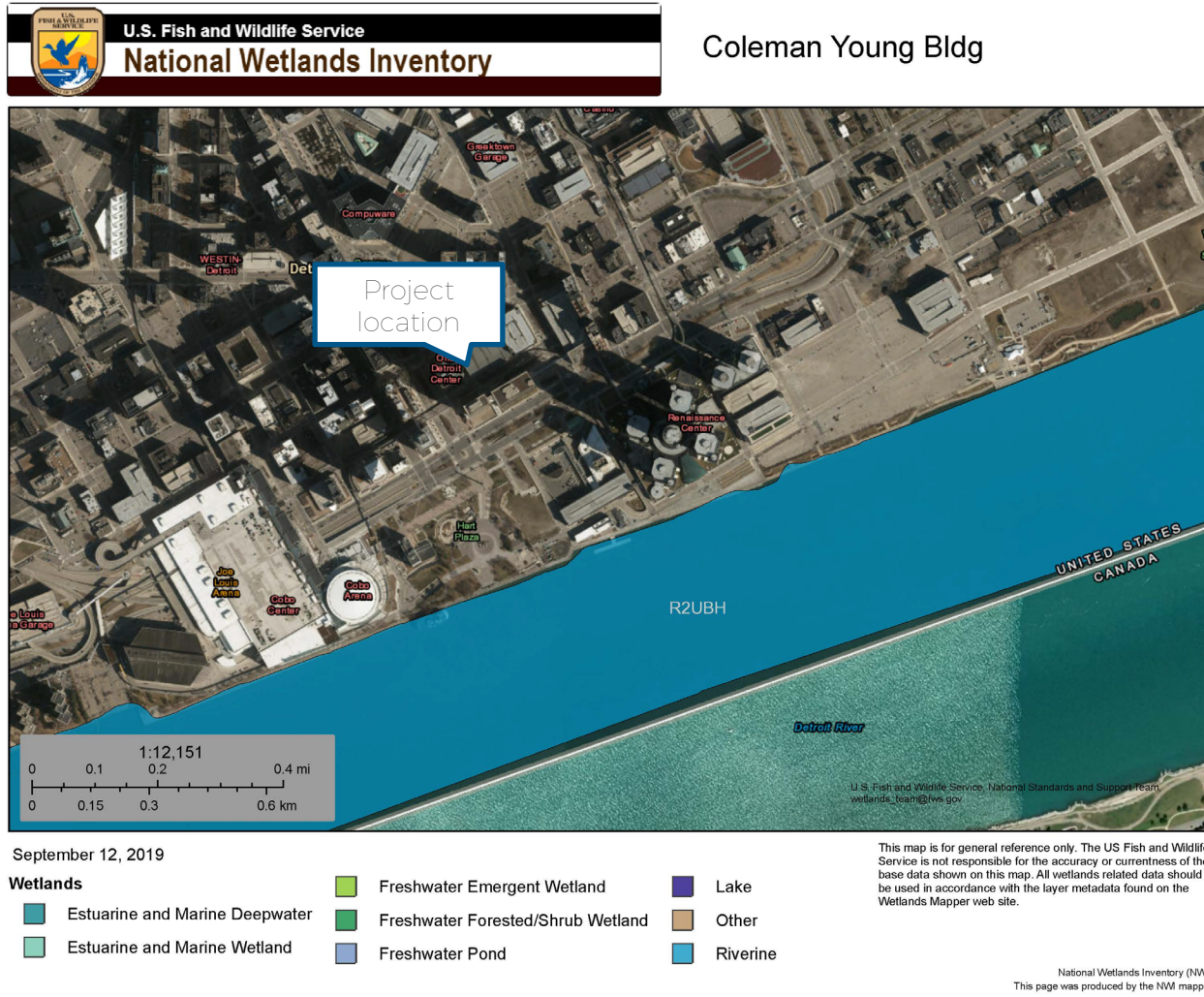


# Sole Source Aquifers

- Either use this [link](#) to obtain map or create a map from EPA using this [link](#) and attach in HEROS
- For more information, here is the link to the Sole Source Aquifer page on the [HUD Exchange](#)

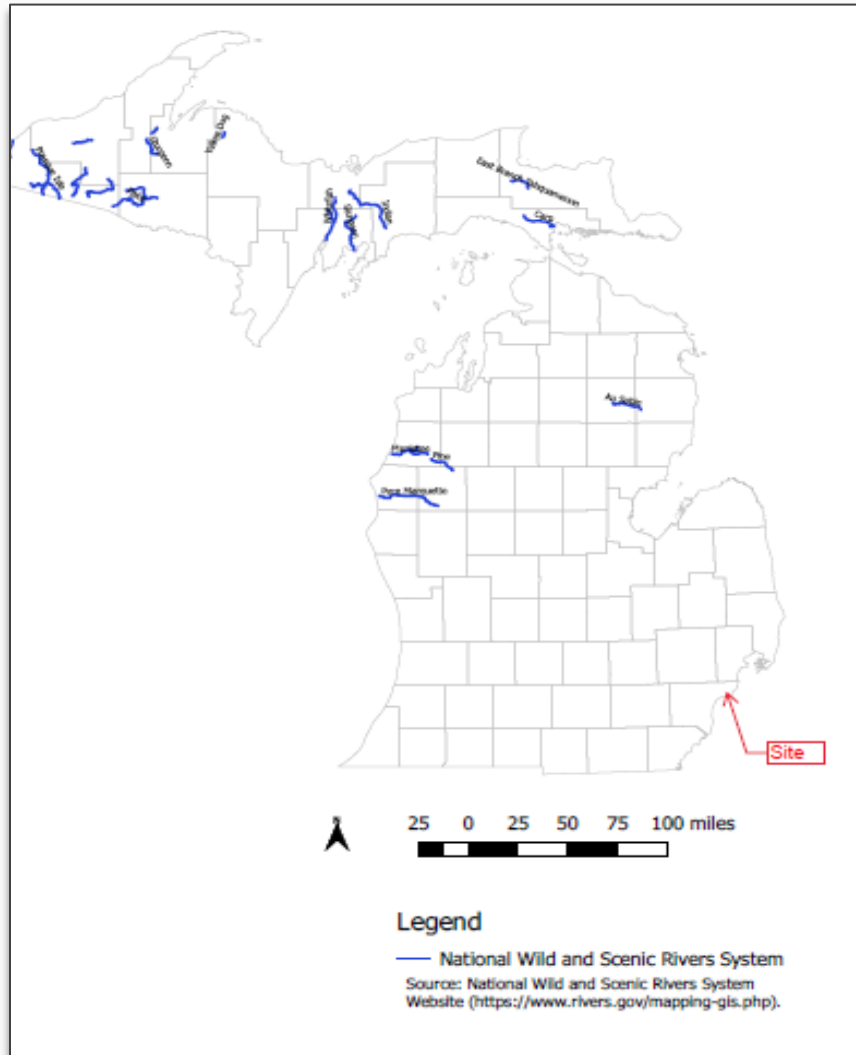


# Wetland Protection



- Most projects will not be in a wetland
- Obtain map from US Fish and Wildlife Service using this [link](#) or from your state environmental governing organization and attach in the HEROS report
- **If the project impacts a wetland, the project needs to complete the eight-step process, up to and including wetland mitigation**
  - Should hire a wetland expert to complete this work
- For more information, see the Wetlands Protection page on the [HUD Exchange](#)
- An overview of the eight-step process can be found [here](#)

# Wild and Scenic Rivers



- Obtain map from your state environmental governing organization or the National Wild and Scenic Rivers System using this [link](#) and document in HEROS
- For more information, here is the link to the Wild and Scenic Rivers page on the [HUD Exchange](#)

# Environmental Justice



- The EPA has removed their EJ Screen Report
- Michigan has their own EJScreen Screening tool using this [link](#)
  - The report should be for a one-mile radius around the site
- If your state governing environmental organization does not have a mapper, you may upload the Partner worksheet on the HUD Exchange as an attachment

# Common Issues: Related Laws & Authorities

- Common issues that arise while reviewing consultant ER's include:
  - Missing supporting documentation
    - **Every law and authority must have source documentation (an attachment) to verify determination**
  - Vague information in the summary section
    - Specifically, the air quality, contamination, noise, and Section 106 portions
    - The summary should include more information and detail than HEROS automatically generates
      - i.e. distance from site to nearest airport, FIRM map number and date, dates of reports, dates letters are issued from government agencies, the information from the reports, etc.
  - The source documentation/exhibit map was not project-specific
    - Indicate the location of the project on the map
  - Detailed information about laws and authorities can be found on the HUD Exchange



# **Components of the HUD Part 58 Environmental Review**

**Environmental Assessment Factors**

# EA Factor and Impact Evaluation

Environmental Assessment Factor	Impact Evaluation
<b>LAND DEVELOPMENT</b>	
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	
Hazards and Nuisances including Site Safety and Noise	
Energy Consumption	
<b>SOCIOECONOMIC</b>	
Employment and Income Patterns	
Demographic Character Changes, Displacement	
<b>COMMUNITY FACILITIES AND SERVICES</b>	
Educational and Cultural Facilities	
Commercial Facilities	
Health Care and Social Services	
Solid Waste Disposal / Recycling	
Waste Water / Sanitary Sewers	
Water Supply	
Public Safety - Police, Fire and Emergency Medical	
Parks, Open Space and Recreation	
Transportation and Accessibility	
<b>NATURAL FEATURES</b>	
Unique Natural Features, Water Resources	
Vegetation, Wildlife	
Other Factors	

- HUD needs to know that the Site and surrounding area can support the new influx of people and that the people have access to basic needs
- Must provide a detailed explanation about the impact of the project on each of the factors
  - i.e. The Detroit Police Department covers the city with the Eighth Precinct covering the project location. The precinct offices are located at 21555 West McNichols Road, is 1,819 feet away from the property. No police services will be negatively impacted by the proposed project.
- Must include maps for the community facility & services section and other relevant factors

# Environmental Assessment Impact Codes

- Minor Beneficial Impact- An outcome of the project is positive in some way, but the community improvement is limited. (An example might be a new mixed-use project whose new parking is available to the neighborhood after the commercial component closes)
- No Impact Anticipated- The proposed project will have no negative effect on the community. (An example would be new residential units require additional potable water from the municipal supply, but the existing system has sufficient capacity to provide for the new residents)
- Minor Adverse Impact- Analysis of the proposal shows that some aspect of the project will negatively affect the community, but the challenge affects a relatively small number of people or is easily mitigated. (An example is a new apartment building that raises traffic volumes at a nearby intersection. Installing a traffic light, turning lane, or turning land signal as project mitigation could improve the intersection's performance)
- Significant or Potentially Significant Impact- If the project analysis finds a significant impact, the project should be modified to avoid the impact. A finding of a significant impact that remains the preferred alternative requires an Environmental Impact Statement



# EA Factor and Impact Evaluation

- **Land Development:**

- Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design
  - How does the project support comprehensive City plans?
  - Is it located in a specific community area or planning area that details existing and future planning initiatives for those areas?
  - What is the current zoning of the classification and does the proposal require a zoning variance?
  - How will the project alter the landform?
  - Will the project alter the landform?
  - Is the project a good fit for the surrounding area?

# EA Factor and Impact Evaluation

- **Land Development:**

- Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff

- Is there evidence of ground subsidence, erosion, or other unusual conditions on the site?
    - Is there any visible evidence of soil problems?
    - Is there evidence of erosion or sedimentation?
    - Is an erosion control plan included as part of the construction contract?
    - Will the project site significantly affect or be affected by erosion or sedimentation conditions?
      - If so, does the design plan include measures to overcome potential erosion problems?
    - Is the site on a slope? If so, is the slope slight, moderate, severe, or very severe?
    - What will be done to address sites with a steeper slope?
    - Will drainage and stormwater conditions significantly affect or be affected by the project site? If so, does its design include measures to overcome potential runoff problems?

# EA Factor and Impact Evaluation

- **Land Development:**

- Hazards and Nuisances including Site Safety and Noise
  - Will the project be affected by natural hazards, air pollution generators, man-made site hazards, nuisances?
  - Is the project itself a noise-generating facility in a noise-sensitive area, such as a site in close proximity to schools and housing?
  - Are mitigation measures required to avoid or guard against various problems?
- For more information, here is the link to the Land Development page on the HUD Exchange
- Include attachments when relevant

# EA Factor and Impact Evaluation

- **Socioeconomic**
  - Employment and Income Patterns
    - Will the project either increase or decrease employment opportunities?
    - Will it create conditions favorable or unfavorable to commercial, industrial, or institutional development?
    - How many temporary and how many permanent jobs will the project create?
  - Demographic Charter Changes/Displacement
    - What is/are the identifiable community(ies) within the sphere of likely impact of the proposed project?
    - Does the proposed project contribute to reducing or significantly altering the racial, ethnic, or income segregations of the area's housing?
    - Will the project directly displace individuals or families? How many people?
    - Will the project result in probable indirect displacement?
  - Environmental Justice
    - Were any adverse environmental impacts identified in the project's environmental review?
    - Is the proposed project located in a low income and/or minority community?
    - Will the project expose the community to disproportionate adverse environmental or human health conditions?
- For more information, here is the link to the Land Development page on the [HUD Exchange](#)
- Include attachments when relevant

# EA Factor and Impact Evaluation

- **Community Facilities and Services**

- **Educational and Cultural Facilities**

- What is the projected increase in student population due to the project?
    - Will the additional school-aged children in the proposed project exceed the capacity of existing or planned school facilities?

- **Commercial Facilities**

- Is there adequate and convenient access to retail stores?
    - If not, can public transportation carry people to retail services within 30 minutes?

- **Health Care Services**

- Will a potential population rise increase the need for area health care services beyond current capacities?
    - Are non-emergency health care services located within reasonable proximity to the proposed project?
    - Are emergency health services available within five minutes?

# EA Factor and Impact Evaluation

- **Community Facilities and Services**

- **Social Services**

- Are the social services located onsite or within a convenient and reasonable distance to the proposed project?
    - Will the proposed project overtax or negatively impact social services?

- **Solid Waste Disposal and Recycling**

- Will a solid waste disposal company or system handle construction debris?
    - What types of solid waste will the completed project generate?
    - What organization will handle garbage collection, composting, and recycling?

- **Wastewater and Sanitary Sewers**

- Does the existing or proposed sewer system have the capacity to adequately service the proposed development?

- **Water Supply**

- Is the municipal water system adequate to serve the proposed project?
    - Will there be upgrades to the water pipes?
    - Provide existing pipe sizes

# EA Factor and Impact Evaluation

- Community Facilities and Services

- Public Safety

- What police services are located within reasonable proximity to the proposed project? What is the approximate response time?
    - What firefighting protection is located within reasonable proximity to the proposed project? What is the approximate response time?
    - What emergency health care providers are located within reasonable proximity to the proposed project? What is the approximate response time?
    - Will the project create a significant burden on police, fire, or health care providers in terms of manpower and/or equipment?

- Parks, Open Space, Recreation

- Are open space and recreational and cultural facilities within reasonable walking distance to the project area, or is adequate public transportation available from the project to these facilities?
    - Will the proposed project cause any overloading of existing open space or recreational or cultural facilities?



# EA Factor and Impact Evaluation

- Community Facilities and Services

- Transportation

- Do safe and adequate public transportation services serve the project?
    - Is the project safely accessible to vehicles? Is vehicle parking adequate, including parking for moving vans/trucks?
    - Does the project facilitate pedestrian movement (e.g., sidewalks, pavement markings, landscaping, pedestrian-activated signal lights, or pedestrian overpasses)?
    - Do bicycle lanes or trails serve the project area? Does the project provide covered, secure parking for bicycles, employees, and residents?
    - Overall, will the existing and reasonably foreseeable transportation facilities and services be adequate to meet the needs of the project?
    - Will the project itself cause a significant adverse impact on the local or regional transportation system (e.g., by reducing the level of service of roadways)?
- For more information, here is the link to the Community Facilities page on the [HUD Exchange](#)
- Include attachments when relevant

# EA Factor and Impact Evaluation

- **Natural Features**

- **Unique Natural Features/Water Resources**

- Will the proposed project location, construction, or activities of project users adversely impact unique natural features on or near the site?
    - Will the project involve a substantial increase in impervious surface area? Does the design include runoff control measures or permeable surfaces?

- **Vegetation/Wildlife**

- Will the project create problems by introducing nuisance or non-indigenous species of vegetation that may be ecologically disruptive, be invasive, threaten the survival of indigenous plant habitats, or disrupt agricultural or silvicultural activities?
    - Will the project damage or destroy trees without replacement and landscaping?
    - Will the project create special hazards for animal life? What types and numbers of animals will the project affect and how?
    - Will the project impact migratory birds? Most birds protected by the federal Migratory Bird Treaty Act are not included in the Endangered Species Act yet are protected by similar protections against a “taking” of birds' nests or eggs. Consult with the U.S. Fish and Wildlife Service (USFWS). Construction activities should occur outside the migratory bird nesting season. Alternatively, survey the site for migratory bird nests prior to construction.
    - Will the project damage or destroy existing wildlife habitats (e.g., removal or blockage of wildlife corridors, such as a riparian buffer)?
    - Will excessive grading alter the groundwater level and thus cause the death of trees and ground cover which in turn diminish animal habitats?

- For more information, here is the link to the Natural Features page on the [HUD Exchange](#)
- Include attachments when relevant

# EA Factor and Impact Evaluation

- Climate and Energy

- Climate Change

- Is this project designed in a way that it will withstand, within the useful life of the project, the expected climate related changes projected for the area? Numerous resources, such as those listed later on this page, are available to help identify future climate threats. As a rule of thumb, the project's mortgage length (often 30-40 years) can be used as a minimum, though the useful life of a building is often much longer.
    - How will increasingly frequent or severe natural disasters affect the proposed project?
    - What specific climate change impacts have been identified for the project area? What measures will help mitigate those impacts? Will they shorten the project's lifespan?
    - The effect of existing or ongoing local infrastructure projects designed to mitigate the impact of climate change may be considered; however, such projects do not eliminate the need to include mitigation measures specific to the proposed project.
    - As you work through the other environmental assessment factors that focus on the natural environment (e.g., water resources, soil suitability, etc.), consider what the results of the analysis would be under moderate and severe future climate scenarios.
    - Do the results of any of these analyses change?
    - How will those likely future results affect the wellbeing of project residents and the natural environment?
    - For example, could heavier precipitation in the future cause stormwater runoff issues, despite the project site's currently sufficient drainage?

# EA Factor and Impact Evaluation

- Climate and Energy

- Energy Efficiency

- Is the project planning to install Energy Star appliances, lighting fixtures, or heating, cooling, and hot water systems? Does the project include programmable thermostats, occupancy sensors in common areas, water filters, insulated hot water pipes, and/or point-of-use/tankless hot water heaters?
    - Does the project design meet the current version of the Energy Star Certified Homes performance standard for single-family and low-rise multifamily housing or the Energy Star Multifamily New Construction standard for multifamily buildings with four or more stories?
    - Is the project seeking a rating under a recognized green building standard such as the following, or other green standard or sustainability program?
    - For large developments, is the project considering LEED-Neighborhood Development (LEED-ND) certification?
    - What is the estimated energy consumption of the proposal and are the energy resources of the utility provider sufficient to support the proposal?
  - For more information, here is the link to the Natural Features page on the [HUD Exchange](#)
  - Include attachments when relevant

# Common Issues Related to EA Factors

- Common issues that arise while reviewing consultant EA Factors include:
  - Minimal information in the summaries
  - Missing documentation for factors (such as maps)

# **Components of the HUD Part 58 Environmental Review**

**Environmental Assessment Analysis**

# Environmental Assessment - Analysis

- **Cumulative Impacts:** The impact on the environment that will result from the incremental impact of the project when added to other past, present, and reasonably foreseeable future actions.
- **Alternatives Analysis:** Discuss alternatives considered and why they were not selected
  - Alternatives considered are limited to the range of alternatives that meet the purpose and need. Those alternatives that do not meet the purpose and need can be dismissed without detailed study. This is an imaginative, creative, and communal process
- **No Action Alternative:** Describe the most likely conditions expected to exist in the future in the absence of the project
- **List of sources, agencies and persons consulted:** EGLE, EPA, etc.



# Environmental Assessment - Analysis

- **Public Outreach:**
  - List other forms of public outreach, if applicable (i.e. public meetings)
- **Lists of Permits:** Provide a list of permits, reviews, and approvals that are required for project construction
  - Note: this also ends up in the mitigation section of the signature page in HEROS. The City opts to keep this section blank to avoid confusion with other mitigation measures
- **Summary of Findings and Conclusions:** Provide a detailed summary of finding and conclusions, and include potential impacts, both beneficial and potentially adverse.
  - Can also discuss changes to proposal to avoid significant impacts, if any

# Common Issues Related to EA Analysis

- Common issues that arise while reviewing consultant EA Analysis include:
  - Minimal information in the summaries
  - No alternatives provided



# **Components of the HUD Part 58 Environmental Review**

**Mitigation Plan**

# Mitigation Plan

- Any project with outstanding mitigation or conditions must include a mitigation plan. The mitigation plan must:
  - Explain how measures will be carried out and monitored
  - Clearly identify persons responsible for implementing and monitoring mitigation measures
  - Provide a timeframe in which they will be completed
  - Provide estimated cost for the measure
- All mitigation measures and conditions will be included in the plan
  - i.e., Contamination, Asbestos, lead, radon, Section 106 Conditional No Adverse Effect, Noise Attenuation, etc.

# Mitigation Plan Example

Response Activity or Continuing Obligation	Required Activities	Party Responsible for Completing Activity	Timing of Activity	Cost	Required Follow-up or Reporting
<b>ResAP – excavation and exposure barriers</b>	Historic uses of the site were identified as RECs, with subsurface investigation confirming soil contamination at levels greater than their respective Generic Residential Cleanup Criteria. Groundwater was not encountered. Response activities to mitigate unacceptable exposures include excavation and exposure barriers (hardscape/engineered barriers). Mitigation measures to be implemented in accordance with the EGLE approved April 2024 ResAP.	Contractor	During Construction	\$376,528	Include results in DDCC report.
<b>ResAP – Clean Fill</b>	The fill material brought to the site will be documented as clean by analytical results from samples collected from the site of origin documenting that the material does not contain metals at concentrations above the applicable generic direct contact criteria.	Contractor	During Construction	\$125,000	Include results in DDCC report.
<b>Documentation of Due Care Compliance</b>	A. Complete a DDCC report and submit to the City of Detroit Environmental Review Officer for review prior to submitting to EGLE. Engineering controls will require an Operations and Maintenance plan. B. Additional requirements such as a Restrictive Covenants and/or a recorded Notice to Title may be requested depending on site conditions.	Consultant	Post Construction	\$6,500	Provide report to HRD's ER Team
<b>Noise Analysis – Unacceptable Noise</b>	Appropriate construction materials will be incorporated in the building to mitigate noise levels within the acceptable range. The HUD STraCAT electronic tool was used to conduct a site specific noise assessment. The assessment indicated the wall assemblies meet required attenuation. The project is in compliance with HUD's Noise regulation with mitigation.	Architect, Construction, Crew, Foremen, Developer,	During Construction	NA	Building specs

# Common Issues Related to Mitigation Plans

- Common issues that arise while reviewing consultant Mitigation Plans include:
  - Not all mitigation measures/conditions added in the HEROS summary page
    - Not all mitigation steps included in this summary
  - The title in the Mitigation Plan is not updated with the project information
  - Plan does not include all ResAP required activities
  - Missing conditions in the plan (i.e., noise, Section 106 CNAE, etc.)



# **Components of the HUD Part 58 Environmental Review**

**Finalizing Review, Construction, and Continuing  
Obligations**



# Completing the Review – Exempt/CENST

- Download a copy of the ERR and ensure all questions are answered
- Print a Signature Page, have the RE Preparer and Certifying Officer (CO) sign the document, and re-upload
- Select the date the Environmental Review Record was signed
- Click Complete
- Download a copy of ERR and attach signed signature page & CBRs map
- You are all set!

# Completing the Review – CEST/EA

- Download a copy of the ERR and ensure all questions are answered
- Print a Signature Page, have the RE Preparer and Certifying Officer (CO) sign the document, and re-upload
- Select the date the Environmental Review Record was signed
- Determine date of publication, fill out the Public Comment contact information, and post the ERR
- Answer public comment page, complete RROF, and obtain AUGF

# Completing the Review – CEST/EA

- When the report is completed by a Partner user,
  - Download a copy of the ER from HEROS for Partner User & RE records
  - The Partner User will assign the review to the RE Preparer
  - RE Preparer will make compliance determinations and (for EA's) confirm if there is a Finding Of No Significant Impact or Finding Of Significant Impact
  - It is highly recommended they provide the RE Preparer with a copy of the HEROS ER and attachments separately outside of HEROS (Dropbox, SharePoint, etc.)
  - Most likely, revisions or additional documentation will be required. It could take several weeks to get through this process depending on the thoroughness of the initial EA

# Completing the Review – CEST/EA

- Download a copy of the final ERR
- Print a Signature Page, have the RE Preparer and Certifying Officer (CO) sign the document, and re-upload
- Select the date the Environmental Review Record was signed
- Determine date of publication, fill out the Public Comment contact information, and post the ERR
- Answer public comment page, complete RROF, and obtain AUGF

# Completing the Review – CEST/EA

- Can download signature page or upload your own
- Fill out publication information, download a copy of the ERR

# After Receiving AUGF

- The City of Detroit has a process in place to ensure mitigation measures are follow
  - If unforeseen environmental conditions are observed during construction (i.e. tank discovered, potential archeological artifacts found, etc.), the consultant will notify the ER Team
  - When applicable, the consultant will provide any relevant reports to the City (asbestos closeouts, etc.)
  - Mitigation measures and final paperwork are reviewed; the City will issue one of the two memos prior to final payout:
    - A Final Closeout Memo – no further action required
    - A Continuing Obligations memo - mitigation measures must continue beyond final construction closeout
      - Typical continuing obligations include:
        - Remedial action documentation including an EGLE approved Documentation of Due Care Compliance (DDCC) or No Further Action (NFA) Report
        - O&M Plans, inspection, and reporting requirements from the DDCC
        - Lead and Asbestos closeout reports and ongoing O&M Plans
      - The responsibility of following up on the CO's will transfer to the Asset Management division of HRD
  - Upload all documents to HEROS after all docs are received or CO memo issued

# Questions?



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# Thank you!

Please direct any follow up questions to Kim Siegel at  
[Kim.Siegel@detroitmi.gov](mailto:Kim.Siegel@detroitmi.gov)



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