

Guide for In-Depth Environmental Monitoring			
Name of Program Participant:			
Staff Consulted:			
Name of Grant Program(s) Reviewed:			
Name(s) of Reviewer(s):		Date:	

NOTE: All questions that address requirements contain the citation for the source of the requirement (statute, regulation, NOFA, or grant agreement). If the requirement is not met, HUD must make a finding of noncompliance. All other questions (questions that do not contain the citation for the requirement) do not address requirements, but are included to assist the reviewer in understanding the participant's program more fully and/or to identify issues that, if not properly addressed, could result in deficient performance. Negative conclusions to these questions may result in a "concern" being raised, but not a "**finding.**"

Instructions: This Exhibit provides guidance for REOs/FEOs to conduct in-depth monitoring of Responsible Entities (REs). The Exhibit is to be used to evaluate the overall content of the RE's Environmental Review Record pursuant to the regulatory requirements of Section 58.38. It therefore is to be completed only once for an RE during monitoring. The Consolidated Plan Action Plan and the RE's drawdowns provide the primary source for the selected activity or projects. In answering the Exhibit questions, the REO/FEO should select projects with the greatest complexity. Findings of noncompliance are to be made following the requirements of Section 58.77(d).

Questions:

1.

Briefly describe the RE's system for carrying out its environmental review responsibilities (e.g., including conditions such as staff changes that could impact its ability to carry out its environmental responsibilities).
Describe Basis for Conclusion:

2.

For the project records reviewed, were there separate Environmental Review Records (ERRs) for each project? [24 CFR 58.38]	<input type="checkbox"/> <input type="checkbox"/> Yes No
Describe Basis for Conclusion:	

3.

Do the ERRs reviewed contain project descriptions, including geographic boundaries (where applicable) and reference all activities included as part of the overall project? [24 CFR 58.38]	<input type="checkbox"/> <input type="checkbox"/> Yes No
Describe Basis for Conclusion:	

4.

Do the ERRs reviewed contain written determinations in those cases in which the RE or its recipients claim that activities/projects are "categorically excluded" or "exempt?" [24 CFR 58.34(b) or 24 CFR 58.35(d)]	<input type="checkbox"/> <input type="checkbox"/> Yes No
Describe Basis for Conclusion:	

5.

Do the ERRs reviewed contain Findings of No Significant Impact (FONSI)? [24 CFR 58.38]	<input type="checkbox"/>	<input type="checkbox"/>
Describe Basis for Conclusion:		

6.

Do the ERRs reviewed contain copies of the published "Notice of Intent to Request Release of Funds" (NOI/RROF) or combined Notices of FONSI and NOI/RROFs? [24 CFR 58.38]	<input type="checkbox"/>	<input type="checkbox"/>
Describe Basis for Conclusion:		

7.

Do the ERRs reviewed contain copies of Form HUD-7015.15, "Request for Release of Funds and Certification?" [24 CFR 58.38]	<input type="checkbox"/>	<input type="checkbox"/>
Describe Basis for Conclusion:		

8.

Do the ERRs reviewed contain the Form HUD-7015.16, "Authority to Use Grant Funds," signed and dated by HUD, or an equivalent letter issued by HUD, indicating that 15 days were allowed for objections? [24 CFR 58.38]	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: 	

9.

For the records reviewed, do the RE's records show that no grant funds were obligated or spent [other than for activities under 24 CFR 58.22(f), 24 CFR 58.34, or 24 CFR 58.35(b)] prior to receipt of the Form HUD-7015.16, "Authority to Use Grant Funds" or equivalent? [24 CFR 58.22]	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: 	

10.

For the records reviewed, do the RE's records show that no physical development activities began prior to receipt of the Form HUD-7015.16, "Authority to Use Grant Funds" or equivalent? [24 CFR 58.22]	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: 	

11.

For the activity/project records reviewed, were the NOI/RROFs disseminated and/or published before the certification was signed by the RE? [24 CFR 58.43, 24 CFR 58.45, and 24 CFR 58.70]	<input type="checkbox"/> <input type="checkbox"/> Yes No
Describe Basis for Conclusion:	

12.

a. For the time period reviewed, had HUD received any objections raising non-compliance issues about the RE?	<input type="checkbox"/> <input type="checkbox"/> Yes No
Describe Basis for Conclusion:	

b. If the answer to “a” above is “yes,” did the RE address any stated objections, once forwarded by HUD? [24 CFR 58.75]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

13.

Do the ERRs reviewed contain documentation to support that applicable Federal laws and authorities listed at 24 CFR 58.5 and 24 CFR 58.6 have been specifically addressed and recognized authoritative sources used to support conclusions? [24 CFR 58.38]	<input type="checkbox"/> <input type="checkbox"/> Yes No
Describe Basis for Conclusion: 	

14.

If mitigating measures were required for projects/activities during the time period reviewed, were the measures included in the ERRs as part of the actions pertaining to the environmental review? [24 CFR 58.38]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion: 	

15.

Where projects were located in floodplains or, if new construction, in wetlands, do the ERRs contain evidence of compliance with: <ul style="list-style-type: none"> • Section 2(a) of Executive Order 11988 on floodplain management; and • Sections 2 and 5 of Executive Order 11990 on the protection of wetlands (if new construction)? 	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion: 	

16.

<p>a. Where projects were located in floodplains or, if new construction, in wetlands, do the ERRs contain evidence that the RE complied with HUD regulations in 24 CFR Part 55 or equivalent public notice and decision-making procedures under Executive Order 11990?</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A</p>
<p>Describe Basis for Conclusion:</p>	

<p>b. Where projects were located in floodplains or, if new construction, in wetlands, is there evidence that the RE considered all practicable alternatives to locating projects in floodplains or wetlands?</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A</p>
<p>Describe Basis for Conclusion:</p>	

<p>c. Where projects were located in floodplains or wetlands, does the RE have copies of any published "Notice Providing Opportunity for Early Public Review" in accordance with 24 CFR 55.20(a) or Executive Order 11990?</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A</p>
<p>Describe Basis for Conclusion:</p>	

17.

Does this review indicate any need for follow-up monitoring or technical assistance by the Field Environmental Officer? If yes, briefly describe the need(s) below.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Describe Basis for Conclusion:		