

# ALABAMA EMERGENCY SOLUTIONS GRANTS PROGRAM ENVIRONMENTAL COMPLIANCE

24 CFR Part 58

Unit of General Local Government (UGLG)

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# *Laws & Regulations*

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- National Environmental Policy Act of 1969
  - 24 CFR Part 51 – Manmade Hazards
  - 24 CFR Part 55 – Floodplains & Wetlands
  - 24 CFR Part 58 – Local Government
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# *Sub-recipient Responsibilities*

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- Chief Elected Official = Certifying Officer
  - Would represent RE in court
  - Delegation of Authority (ENV-DOA)
  - Designate Environmental Review Officer
    - Responsible for conducting Environmental Review
    - May be an employee of the locality or contracted
    - Must follow proper procurement procedures
    - Not required for Non-Profits
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# *Sub-recipient Responsibilities*

## Environmental Review Officer's Responsibilities

- Create an Environmental Review Record (ERR)
  - Classify Activities Correctly
  - Conduct Review
  - Complete Public Notification Correctly (if required)
  - Submit Required Documentation
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# *Activity Classifications*

- ~~58.34~~ = Exempt
  - ~~58.35~~ = Categorically Excluded
    - Subject to 58.5
    - Not Subject to 58.5
  - 58.36 – Environmental Assessment
  - 58.36 – Environmental Assessment
  - 58.37 – Environmental Impact Statement
  - 58.37 – Environmental Impact Statement
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# Classifying

ESG Components & Activities	Level of Review	Applicable Part 58 Citation
<b>Street Outreach (24 CFR 576.101)</b>		
Engagement, Case Management, Emergency Health Services, Emergency Mental Health Services, Transportation	Exempt or CENST*	§58.34(a)(4) or §58.35(b)(2)
<b>Emergency Shelter (24 CFR 576.102)</b>		
Essential Services	Exempt or CENST*	§58.34(a)(4) or §58.35(b)(2)
Shelter Operations (except rent and repairs)	CENST	§58.35(b)(3)
Repairs/Minor Rehabilitation <sup>2</sup>	CENST	§58.35(a)(3)(iii)
Rent (Leasing)	CEST	§58.35(a)(5)
Major Rehabilitation & Conversion	EA	§58.36
URA Assistance (The environmental review for these costs should be included as part of the review of the activity that caused the displacement.)		
<b>Homeless Prevention &amp; Rapid Re-housing (24 CFR 576.105 &amp; 576.106)</b>		
Housing Relocation & Stabilization Services - Services Costs	Exempt or CENST*	§58.34(a)(4) or §58.35(b)(2)
Housing Relocation & Stabilization Services - Financial Assistance Costs	CENST	§58.35(b)(2)
Tenant-Based Rental Assistance	CENST	§58.35(b)(1)
Project-Based Rental Assistance <sup>3</sup>	CEST	§58.35(a)(5)
Leasing Office Space	CEST	§58.35(a)(5)
<b>HMIS (24 CFR 576.107)</b>		
TA, Salaries for HMIS Administrators	Exempt	§58.34(a)(9) or §58.34(a)(3)
Purchase/Leasing Equipment, Utilities, Travel for TA	CENST	§58.35(b)(3)
Leasing Office Space	CENST	§58.35(a)(5)
<b>Administrative Activities (24 CFR 576.108)</b>		
TA, General Management/Oversight/Coordination (Except Office Equipment)	Exempt	§58.34(a)(9); §58.34(a)(3)
Consolidated Plan, Environmental Review	Exempt	§58.34(a)(1)
Office Equipment	CENST	§58.35(b)(3)
Leasing Office Space	CEST	§58.35(a)(5)

# *Getting Started*

## Two Types

- Non-Profit Organizations
  - Local Units of Government
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*Instructions: Supply the information requested below. Fill out an "Attachment" form for the Sub-recipient and each Second-tier Sub-recipient listed below, if applicable.*

**Sub-recipient Information:**

Sub-recipient: \_\_\_\_\_ Contract Number: \_\_\_\_\_  
 Address: \_\_\_\_\_ City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_ County: Select County  
 ADECA Funds: \_\_\_\_\_ Matching Funds: \_\_\_\_\_ Total Funds: \_\_\_\_\_

**Project/Activity Description:**

**List the Second-tier Sub-recipient(s) below:**

1) Name: _____	Total Amount Funded: _____
2) Name: _____	Total Amount Funded: _____
3) Name: _____	Total Amount Funded: _____
4) Name: _____	Total Amount Funded: _____
5) Name: _____	Total Amount Funded: _____
6) Name: _____	Total Amount Funded: _____
7) Name: _____	Total Amount Funded: _____
8) Name: _____	Total Amount Funded: _____
9) Name: _____	Total Amount Funded: _____
10) Name: _____	Total Amount Funded: _____

\_\_\_\_\_  
Authorized Responsible Entity Name (printed)

\_\_\_\_\_  
Title (printed)

\_\_\_\_\_  
Authorized Responsible Entity Signature

\_\_\_\_\_  
Date

# Conducting the Review

## Non-Profit Organizations

- Complete the Non-profit Level of Review Form
  - Complete the Sub-recipient Information
  - Include Complete Funding Totals
  - Include a Complete Project Description
  - Ensure the Proper Signature



**Attachment**  
**ESG Non-profit Level of Environmental Review Form**

**Check the one that applies:**

- Sub-recipient
- Second-tier Sub-recipient

Name: \_\_\_\_\_ Contract Number: \_\_\_\_\_

Address: \_\_\_\_\_ City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_ County: \_\_\_\_\_

Total Funds Received/Retained: \$ \_\_\_\_\_

Project/Activity Description:

**Check All That Apply:**

<b>Street Outreach (24 CFR 576.101)</b>	
<input type="checkbox"/>	Engagement, Case Management, Emergency Health Services, Emergency Mental Health Services, Transportation
<b>Emergency Shelter (24 CFR 576.102)</b>	
<input type="checkbox"/>	Essential Services
<input type="checkbox"/>	Shelter Operations (except rent and repairs)
<input type="checkbox"/>	Repairs, Minor Rehabilitation
<input type="checkbox"/>	Rent (leasing)
<input type="checkbox"/>	Major Rehabilitation and Conversion
<input type="checkbox"/>	URA Assistance
<b>Homelessness Prevention &amp; Rapid Re-housing (24 CFR 576.105; 24 CFR 576.106)</b>	
<input type="checkbox"/>	Housing Relocation and Stabilization Services – Services Costs
<input type="checkbox"/>	Housing Relocation and Stabilization Services – Financial Assistance Costs
<input type="checkbox"/>	Tenant – based Rental Assistance
<input type="checkbox"/>	Leasing Office Space
<b>HMIS (24 CFR 576.107)</b>	
<input type="checkbox"/>	TA, Salaries for HMIS Administrators
<input type="checkbox"/>	Purchasing/leasing Equipment, Utilities, Travel for TA
<input type="checkbox"/>	Leasing Office Space
<b>Administrative Activities (24 CFR 576.108)</b>	
<input type="checkbox"/>	TA, General Management/Oversight/Coordination (except office equipment)
<input type="checkbox"/>	Office Equipment
<input type="checkbox"/>	Leasing Office Space

\_\_\_\_\_  
 Authorized Responsible Entity Name (printed)

\_\_\_\_\_  
 Title (printed)

\_\_\_\_\_  
 Authorized Responsible Entity Signature

\_\_\_\_\_  
 Date

# Conducting the Review

## Non-Profit Organizations

- Complete a Non-profit Level of Review Form Attachment (1 for you and 1 for each 2nd tier recipient)
  - Check the Sub-recipient/Second-tier Sub-recipient Box and Include that Recipient’s Information
  - Include Individual Funding total
  - Include Individual Project Description based on chart selections
  - Ensure Proper Signature
- Submit to ADECA

# Project Descriptions

Check All That Apply:

	Street Outreach (24 CFR 576.101)
<input type="checkbox"/>	Engagement, Case Management, Emergency Health Services, Emergency Mental Health Services, Transportation
	Emergency Shelter (24 CFR 576.102)

Project/Activity Description:

Project activities are to include:


Emergency Shelter: Rent;

Homelessness Prevention & Rapid Re-Housing: Leasing Office Space (Address, City, AL, Zip);

Administrative Activities: TA, General Management/Oversight/Coordination (except office equipment),

Leasing Office Space (Address, City, AL, Zip).

List the Second-tier Sub-recipient(s) below:

<input type="checkbox"/>	Office Equipment
<input checked="" type="checkbox"/>	Leasing Office Space 


# *Conducting the Review*

## **Units of Local Government**

- CDBG Environmental Review requirements govern
  - Environmental Review Guide and CDBG Environmental Review Website (Google search ADECA Environmental)
  - When the Review is completed, submit required info to ADECA
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# *Additional Information*

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- ADECA Environmental Review website:  
<http://adeca.alabama.gov/Divisions/ced/cdp/Pages/Environmental.aspx>
  - HUD webinars:  
<https://www.hudexchange.info/environmental-review/environmental-review-training/>
  - HUD Web-Based Instructional System for Environmental Review (WISER):  
[https://www.hudexchange.info/trainings/wiser/?utm\\_source=HUD+Exchange+Mailing+List&utm\\_campaign=9fo713617d-WISER\\_Training\\_Modules\\_2017\\_12\\_01&utm\\_medium=email&utm\\_term=0\\_f32b935a5f-9fo713617d-19295981](https://www.hudexchange.info/trainings/wiser/?utm_source=HUD+Exchange+Mailing+List&utm_campaign=9fo713617d-WISER_Training_Modules_2017_12_01&utm_medium=email&utm_term=0_f32b935a5f-9fo713617d-19295981)
  - HUD Related Federal Laws & Authorities:  
<https://www.hudexchange.info/environmental-review/federal-related-laws-and-authorities>
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*Thank You*

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