

### Levels of Environmental Review for ESG Components

Levels of Environmental Review:

**Exempt: Subject to §58.6**

**CENST: Categorically Excluded Not Subject to §58.5 (Still subject to §58.6)**

**CEST: Categorically Excluded Subject to §58.5 (Also subject to §58.6)**

**EA: Environmental Assessment (May require an Environmental Impact Statement (EIS) if any conditions in §58.37 apply; also subject to §58.6)**

**\*Where the Level of Environmental Review is determined as “Exempt” or “CENST” the Responsible Entity (RE) has the discretion to determine whether the activity is more appropriately categorized as an activity listed at §58.34(a)(4) [Exempt] or §58.35(b)(2) [CENST]**

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	<b>Exempt or CENST*</b>	§58.34(a)(4) or §58.35(b)(2)
<b>Emergency Shelter (24 CFR 576.102)</b>		
Essential Services	<b>Exempt or CENST*</b>	§58.34(a)(4) or §58.35(b)(2)
Shelter Operations (except rent and repairs)	<b>CENST</b>	§58.35(b)(3)
Repairs <sup>1</sup> , Minor Rehabilitation <sup>2</sup>	<b>CEST</b>	§58.35(a)(3)(iii)
Rent (Leasing)	<b>CEST</b>	§58.35(a)(5)
Major Rehabilitation & Conversion	<b>EA</b>	§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	<b>Exempt or CENST*</b>	§58.34(a)(4) or §58.35(b)(2)
Housing Relocation & Stabilization Services - Financial Assistance Costs	<b>CENST</b>	§58.35(b)(2)
Tenant-Based Rental Assistance	<b>CENST</b>	§58.35(b)(1)
Project-Based Rental Assistance <sup>3</sup>	<b>CEST</b>	§58.35(a)(5)
Leasing Office Space	<b>CEST</b>	§58.35(a)(5)
<b>HMIS (24 CFR 576.107)</b>		
TA, Salaries for HMIS Administrators	<b>Exempt</b>	§58.34(a)(9) or §58.34(a)(3)
Purchasing/Leasing Equipment, Utilities, Travel for TA	<b>CENST</b>	§58.35(b)(3)
Leasing Office Space	<b>CEST</b>	§58.35(a)(5)
<b>Administrative Activities (24 CFR 576.108)</b>		
TA, General Management/Oversight/Coordination (Except Office Equipment)	<b>Exempt</b>	§58.34(a)(9); §58.34(a)(3)
Consolidated Plan, Environmental Review	<b>Exempt</b>	§58.34(a)(1)
Office Equipment	<b>CENST</b>	§58.35(b)(3)
Leasing Office Space	<b>CEST</b>	§58.35(a)(5)

**Repairs, maintenance, and minor rehabilitation are being defined for the purposes of ESG environmental review only; major rehabilitation is being re-defined for the purposes of ESG environmental review only.**

<sup>1</sup>“**Repairs**” should be distinguished from maintenance activities, which are categorized as CENST under §58.35(b)(3). Unlike repairs and improvements, maintenance activities do not materially add to the value of the building, appreciably prolong its useful life, or adapt it to new uses, and may include cleaning, protective or preventative measures, and replacement of appliances and objects that are not fixtures. Repairs are included within 'minor rehabilitation' for environmental review purposes.

<sup>2</sup>“**Minor rehabilitation**” for the purposes of ESG environmental review, minor rehabilitation is considered rehabilitation of public facilities where the facility is in place and will be retained in the same use without change in size or capacity of more than 20%.

<sup>3</sup>“**Project-based rental assistance**” defined as rental assistance that is attached to a residential unit, not to a tenant. For example, a review would be required if the recipient or subrecipient enters into a contract with a housing owner to provide rental assistance for one or more vacant units that the owner promises to lease to program participants.