



# Environmental Review Record (ERR) Requirements for Consultants

City of Detroit Housing and Revitalization Department

June 7, 2023

# Introductions

## City of Detroit Housing and Revitalization (HRD) Environmental Review Team

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# 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 required mitigation and any further work required



# Submitting Your Report

- 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 Kim Siegel through HEROS.
- 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](#)
- Additionally, consultants must submit a copy of their completed HEROS report and all attachments to Kim Siegel separately



# HUD Environmental Review Online System

- As a Partner User, you can fill out the project information on behalf of your client
- Partner worksheets are available at the [HUD Exchange](#)
- Please select the correct level of review that the ER Team has determined for the project
- You cannot check the box for formal mitigation or conditions



# HUD Environmental Review Online System – Tips and Tricks

- If you do not currently have HEROS access, request HEROS access a minimum of two months prior to submission of the ERR
- **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



# 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





# Common Issues Project Information

- Listing the developer or their LLC as the “Sub-recipient”
- Vague Project Descriptions that do not include the entire scope of work regardless of funding sources
- Minimal information provided for the Statement of Purpose & Need and Existing Trends and Conditions (EA’s)
- Not including all activities on the Project Summary Screen

# 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"/>	Community Planning and Development (CPD) <input type="text"/>	HOME Program <input type="text"/>
<input type="text" value="M1001"/>	Public Housing <input type="text"/>	Project-Based Voucher Program <input type="text"/>

\* **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 City of Detroit HUD Programs (including Detroit Housing Commission Vouchers)
  - Can use placeholder for grant number
- **Estimated Total HUD Funding:** Total allocation of 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
- **Grant Recipient Information: Do not fill this out**
- **Consultant Information:** The Name of Firm and the Name of Preparer for the EA

# Project Summary

- **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.)
  - **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

- Provide a detailed scope that include the entire planned known undertaking 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 funding amount (including the funding years) and the statement, “This environmental review is valid for up to five years” at the bottom of the project description text box.




# Project Summary

- **Project Location**

- **Street:** If there is more than one address, type “Multiple” here and add the list of addresses to the “Location Information” section
- **City:** Detroit
- **State:** Michigan
- **Zip:** Zip code of address(es)
- **Location Information:** Add multiple addresses here (if applicable)
- **Uploads:**
  - Site map
  - Project site plans
  - Market Study



# Project Summary

- **Activities involved in the project:** Check ALL activities regardless of funding source
  - **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
- 



# Levels of Review

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



# Level of Review

- The determination of the level of review always comes from the ER Team
- The ER Team determines the preliminary level of review when a NOFA application receives a conditional award and confirms the level of review during the Environmental Kick-Off Meeting
  - This is one of many reasons why a complete and accurate project description is important!

# Cooperating Agency

1365 - Cooperating Agency (50/58)

Project Name: HRD-ENVIRONMENTAL-TRAINING

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.

Is there a formal Cooperating Agency Agreement governing the environmental review?

Yes

No

Check the reason an agreement was not reached:

- Not initiated
- Potential Cooperating Agency lacked special expertise and jurisdiction by law
- Potential Cooperating Agency lacked authority to enter into an agreement to be a Cooperating Agency
- 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)
- 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)
- Other

Explain "Other"

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.

Insert the name(s) of any Agency or agencies contacted:

N/A

- 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.
- The City of Detroit does not currently have a formal Cooperating Agency Agreement with any other federal agencies.
  - Therefore, you could select "Not Initiated" for non-HUD/non-ARPA funding and "Other" for ARPA funding
    - ARPA funding is not subject to environmental review requirements.
- Please reach out to the ER Team if other federal funding sources (other than ARPA) will be utilized in the project to coordinate the federal review

# Project Justification (EA ONLY)

- **Purpose and Need Statement** – Provided by the Developer – must be thorough
  - Purpose – Explain the proposed solution to solve the problem or a desired condition you want to create
    - i.e. construction of new housing or constructing a new transit center
  - Need – The problem(s) that needs fixing or the situation(s) wanting improvement & how the project will positively impact the problem(s) and/or situation(s)
    - i.e. shortage of affordable housing or lack of transportation options in a community
- **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.)
  - Census data
  - Area description



# 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.

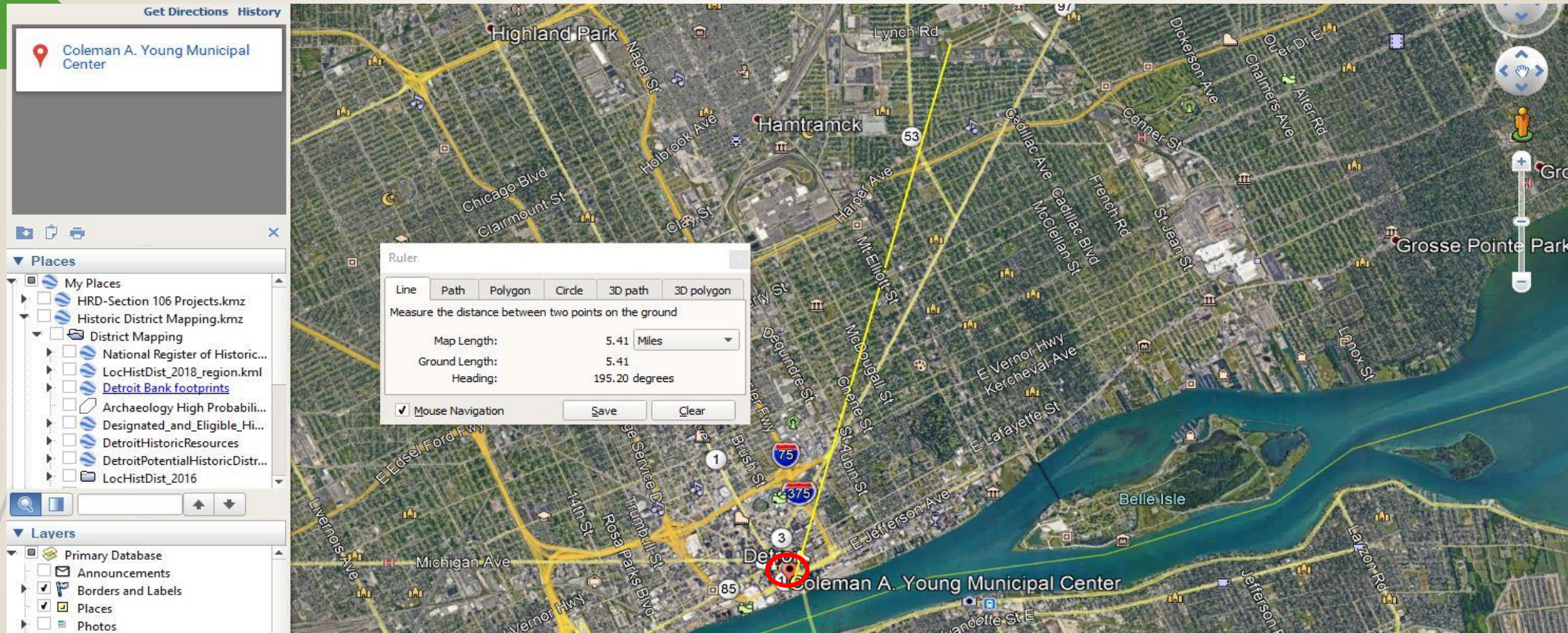
<b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6</b>		
<b>Airport Hazards</b>	Yes No <input type="checkbox"/> <input type="checkbox"/>	
24 CFR Part 51 Subpart D		
<b>Coastal Barrier Resources</b>	Yes No <input type="checkbox"/> <input type="checkbox"/>	
Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]		
<b>Flood Insurance</b>	Yes No <input type="checkbox"/> <input type="checkbox"/>	
Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]		
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 &amp; 58.5</b>		
<b>Clean Air</b>	Yes No <input type="checkbox"/> <input type="checkbox"/>	
Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93		
<b>Coastal Zone Management</b>	Yes No <input type="checkbox"/> <input type="checkbox"/>	
Coastal Zone Management Act, sections 307(c) & (d)		
<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>	Yes No <input type="checkbox"/> <input type="checkbox"/>	
Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402		
<b>Explosive and Flammable Hazards</b>	Yes No <input type="checkbox"/> <input type="checkbox"/>	
24 CFR Part 51 Subpart C		
<b>Farmlands Protection</b>	Yes No <input type="checkbox"/> <input type="checkbox"/>	
Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658		
<b>Floodplain Management</b>	Yes No <input type="checkbox"/> <input type="checkbox"/>	
Executive Order 11988, particularly section 2(a); 24 CFR Part 55		
<b>Historic Preservation</b>	Yes No <input type="checkbox"/> <input type="checkbox"/>	
National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800		
<b>Noise Abatement and Control</b>	Yes No <input type="checkbox"/> <input type="checkbox"/>	
Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B		
<b>Sole Source Aquifers</b>	Yes No <input type="checkbox"/> <input type="checkbox"/>	
Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149		
<b>Wetlands Protection</b>	Yes No <input type="checkbox"/> <input type="checkbox"/>	
Executive Order 11990, particularly sections 2 and 5		
<b>Wild and Scenic Rivers</b>	Yes No <input type="checkbox"/> <input type="checkbox"/>	
Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)		
<b>ENVIRONMENTAL JUSTICE</b>		
<b>Environmental Justice</b>	Yes No <input type="checkbox"/> <input type="checkbox"/>	
Executive Order 12898		

# Common Issues Related Laws & Authorities

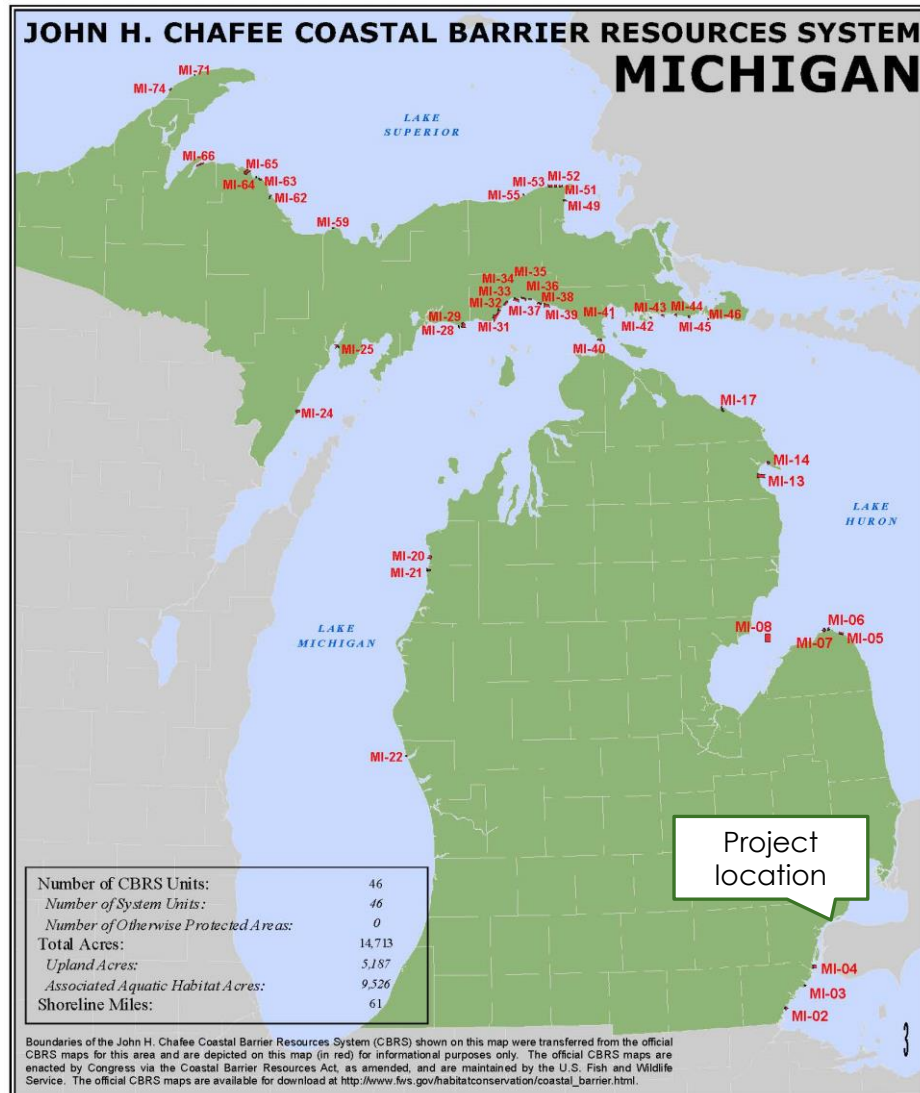
- Common issues that arise while reviewing consultant ER's include:
  - Missing supporting documentation
    - **Every law and authority must have source documentation (an attachment) to verify your determination**
  - Vague information in the laws & authorities summaries
    - Specifically, the air quality, contamination, noise and Section 106 portions
  - 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](#)

# Airport Hazard



- 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



- There are no coastal barrier resources in Detroit
- Map must indicate where the project is located
- Obtain map from US Fish and Wildlife Services using this [link](#)



# Flood Insurance

## FEMA Flood Map Service Center: Search By Address

Enter an address, place, or coordinates: ?

2 Woodward Ave Detroit, MI

Search



Whether you are in a high risk zone or not, you may need [flood insurance](#) because most homeowners insurance doesn't cover flood damage. If you live in an area with low or moderate flood risk, you are 5 times more likely to experience flood than a fire in your home over the next 30 years. For many, a National Flood Insurance Program's flood insurance policy could cost less than \$400 per year. Call your insurance agent today and protect what you've built.

Learn more about [steps you can take](#) to reduce flood risk damage.

Search Results—Products for DETROIT, CITY OF

Show ALL Products »

The flood map for the selected area is number **26163C0285E**, effective on **02/02/2012** ?

DYNAMIC MAP



PRINT MAP/  
FIRMette

MAP IMAGE



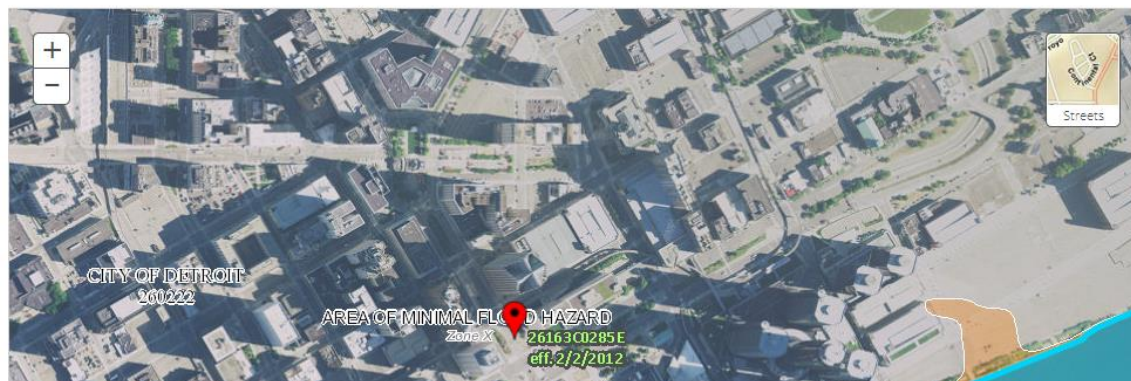
DOWNLOAD  
FIRM PANEL

Changes to this FIRM ?

- Revisions (0)
- Amendments (1)
- Revalidations (0)

You can choose a new flood map or move the location pin by selecting a different location on the locator map below or by entering a new location in the search field above. It may take a minute or more during peak hours to generate a dynamic FIRMette. If you are a person with a disability, are blind, or have low vision, and need assistance, please contact a map specialist.

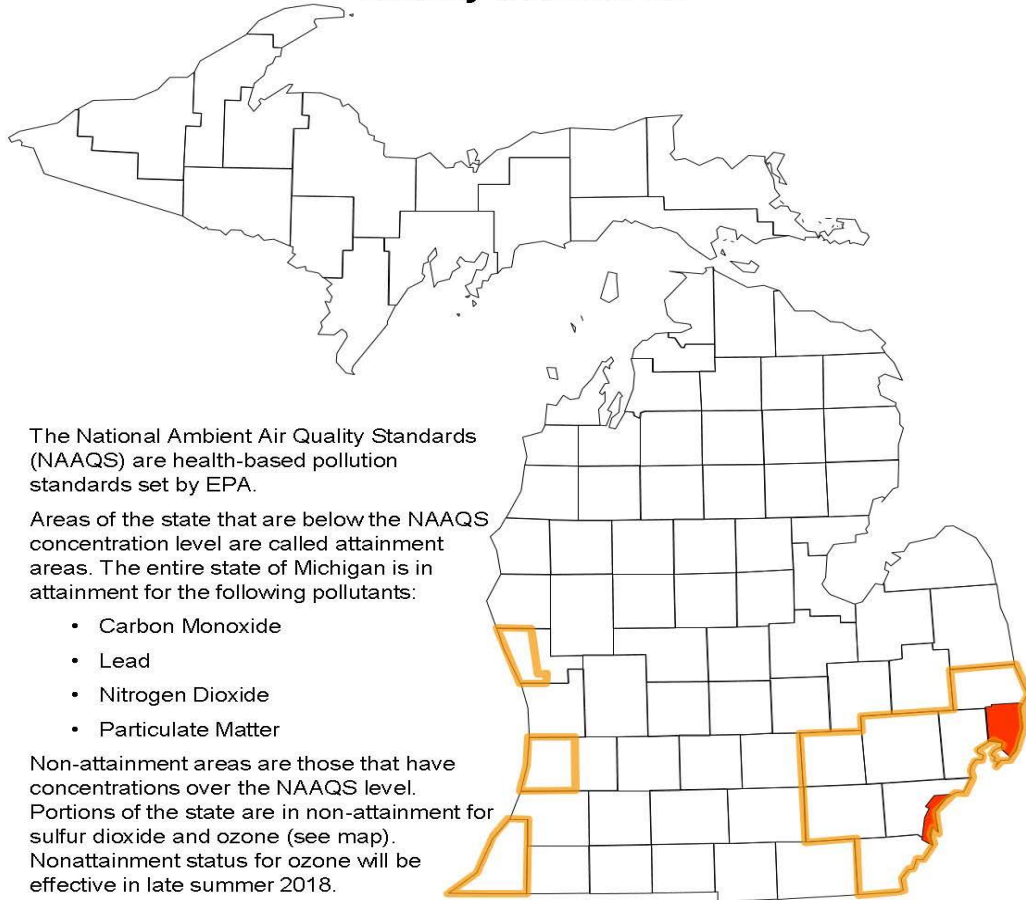
Go To NFHL Viewer »



- **Important: If the project is in the Special Flood Hazard Zone (SFHZ), any current or future structures located in the SFHZ will need flood insurance for the life of the building irrespective of the transfer of ownership.**
- 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, here is the link to the Flood Insurance page on the [HUD Exchange](#)


# Clean Air

## Attainment Status for the National Ambient Air Quality Standards



### LEGEND

 Sulfur Dioxide Nonattainment Area

 Ozone Nonattainment Area

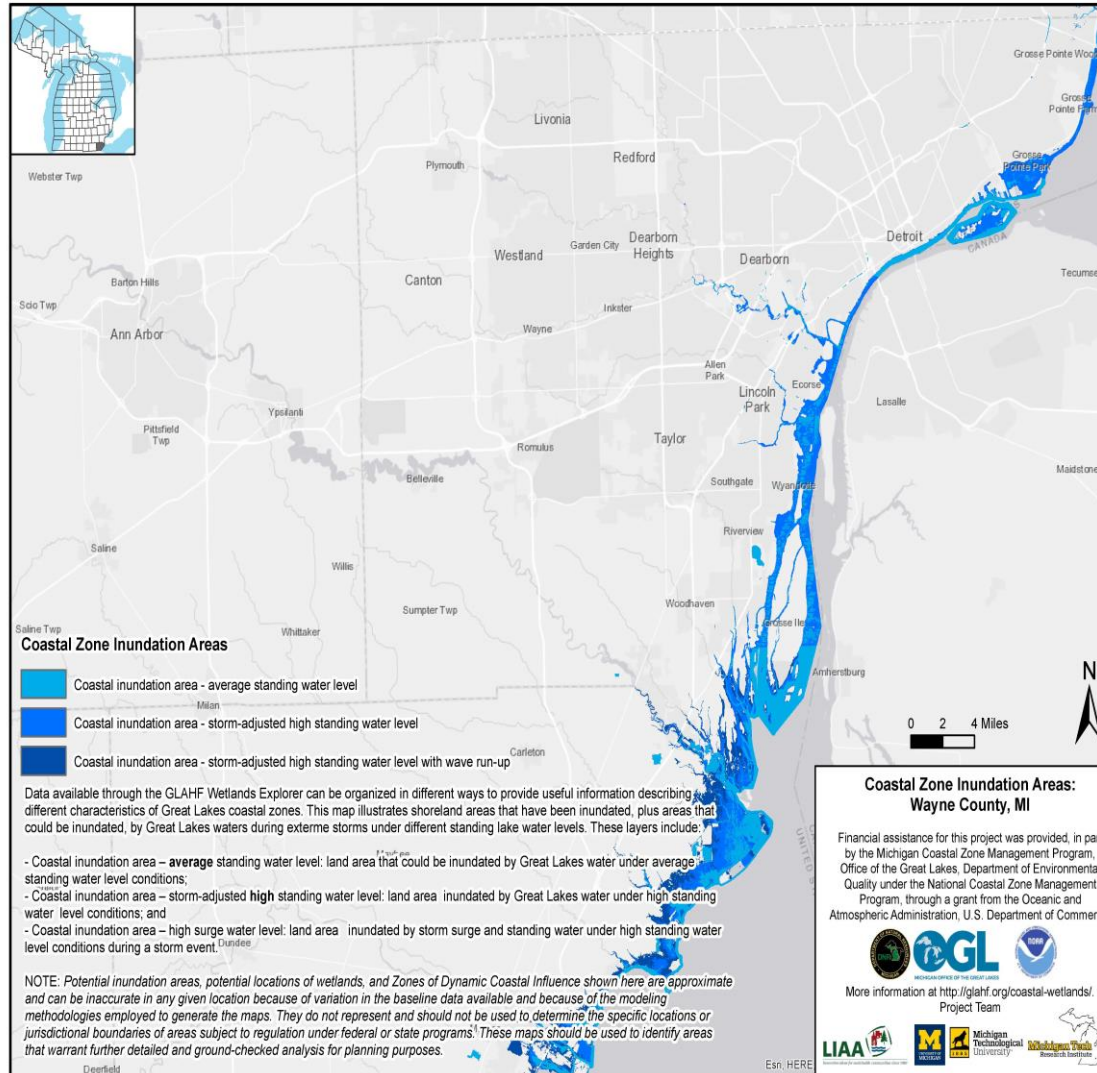
See Page 2 for close-up maps of partial county nonattainment areas

- As of June, Wayne County (including the City) now in a **maintenance area** for Ozone and occasionally will be located 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.
- Obtain and attach the Air Quality Map from EGLE using this [link](#)

# 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, you 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
  - Ask for a letter of concurrence letter from the Air Quality Division at EGLE on the project description not adding impact to the Ozone maintenance area and potentially Sulfur Dioxide non-attainment zone
    - Current contact at EGLE is Breanna Bukowski: [BukowskiB@detroitmi.gov](mailto:BukowskiB@detroitmi.gov)
  - Attach non-attainment map, non-conformity letter and De Minimis Levels source page
  - For more information, here is the link to the Air Quality page on the [HUD Exchange](#)

# Coastal Zone Management



- Obtain a map from EGLE using this [link](#) or the Great Lakes Aquatic Habitat Framework using this [link](#)
- Map must indicate where the project is located
- If your project is located in the CZM, you will need additional documentation from EGLE
- For more information, here is the link to the Coastal Zone Management page on the [HUD Exchange](#)

# 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
    - If the determination is the site has no Recognized Environmental Conditions (REC's), discuss 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

- REC's observed in the Phase I ESA will necessitate a Phase II ESA (physical testing) at the Site
  - Phase II ESA field work may require consultation before finalizing the scope of work
    - City of Detroit will not dictate the Phase II ESA scope of work
    - MSHDA will want to see this before proceeding with fieldwork
  - 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 a Facility:
  - HUD requires that any contamination above residential criteria has an EGLE approved plan to mitigate exposure to residents
    - Part 201 contamination – Response Activity Plan (ResAP)
    - Part 213 contamination – Final Assessment Report with a Corrective Action Plan (CAP)
  - Further Site characterization may be required to adequately assess the potential exposure pathways. The Site characterization scope of work should be discussed with EGLE, the City of Detroit, and MSHDA (if co-funded) before finalizing.
  - 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

# Contamination and Toxic Substances

- There are two separate paths to liaise with EGLE for City of Detroit projects
  - Projects without MSHDA funding go through the EGLE RRD Detroit office;
  - Projects co-funded with MSHDA go through the MSHDA EGLE staff members
- Again – begin consultation with EGLE as soon as contamination has been verified at the site.
- HUD does NOT require a No Further Action (NFA) Determination for Part 58 Reviews; however, HUD DOES require NFAs for Part 50 Reviews – HUD 221d4 loans and others
- **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

- For projects with ACT 381 Brownfield Grants, provide a synopsis of the grant in the summary and list any mitigation measures for compliance
- Include a list of the reports required, a summary of the reports, the contaminants that are above EGLE criteria and a summary of the mitigation steps outlined in a ResAP, CAP or Act 381 Brownfield Grant.
- Attach all reports (Phase I, Phase II, BEA, ResAP, CAP, Act 381 Workplan, EGLE sign off, etc.)
- **Make sure the summary is thorough and detailed! Contamination is one of the more challenging compliance aspects of HUD Environmental Review in the City of Detroit.**
- For more information, here is the link to the Site Contamination page on the [HUD Exchange](#) and a link to the [EGLE Remediation & Redevelopment page](#)



# Endangered Species

The screenshot shows the U.S. Fish & Wildlife Service website. The header includes the agency logo and name. The main navigation menu on the left lists various sections, with 'Section 7 Consultation' expanded to show sub-links like '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 Decision Process for "No Effect" Determinations' and focuses on 'Projects within a Developed Area - Step 5'. It details the requirements for a 'No Effect' determination, including a list of conditions and instructions on how to document the review. A 'Project Name:' and 'Date:' field are visible at the bottom of the form section. A footer contains the agency's mission statement.

U.S. Fish & Wildlife Service  
Midwest Region Endangered Species

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

## 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:**

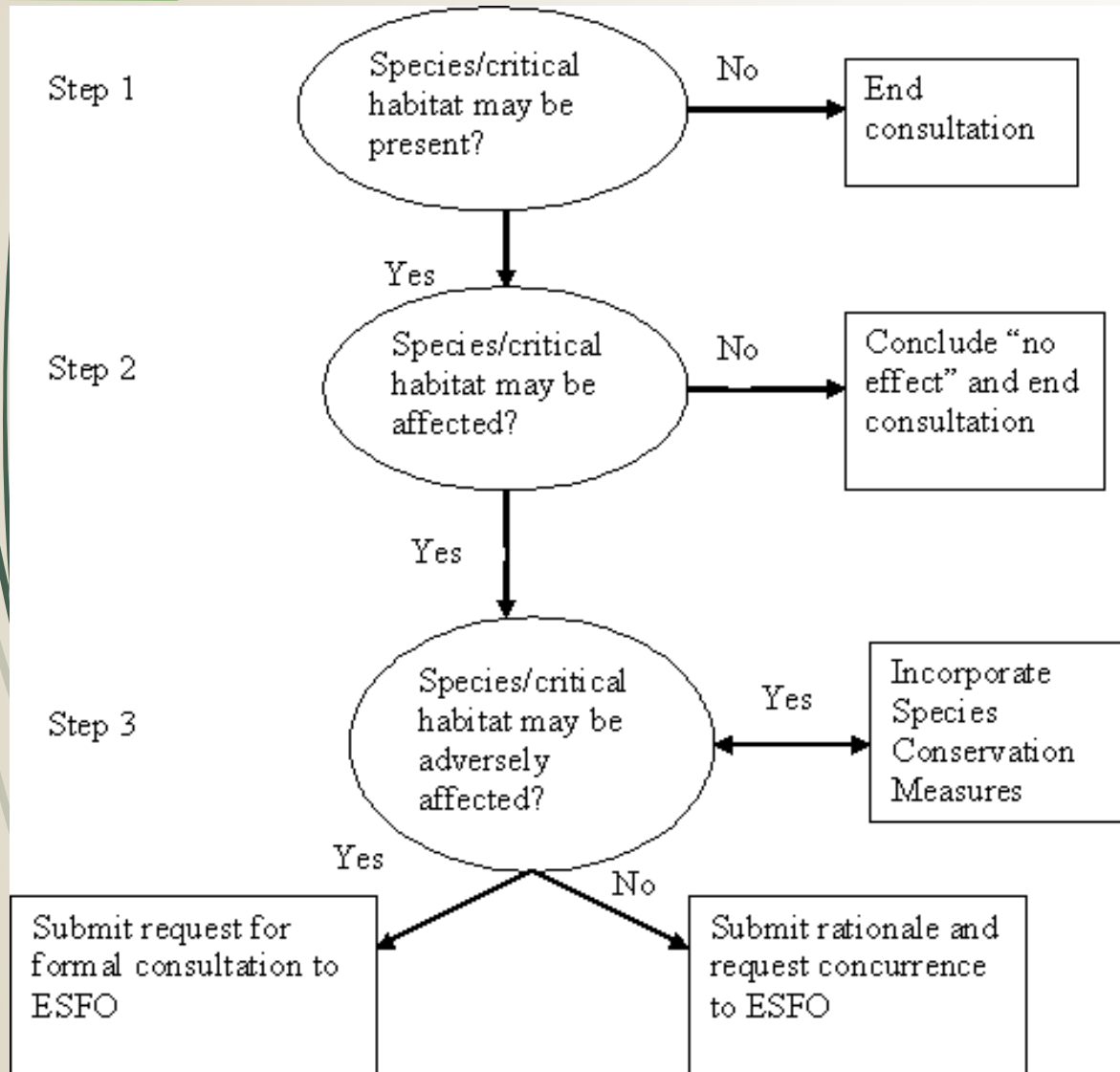
[Back](#)  
[Home - "No Effect" Determination Process](#)

**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.*

- Obtain a species list from the US Fish & Wildlife Service's 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.). It is unlikely that T&E species will or may be found on these sites
  - You can use this as your HEROS summary

# Endangered Species



- If you think the project will likely impact a T&E Species, please reach out to the ER Team to discuss next steps
  - This may require further consultation with the USFWS
- 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](#)
- **As of March 2023, the USFWS is pending a reclassify the Northern Long Eared Bat from threatened to endangered**

# Explosive and Flammable Hazards

There are potentially three questions you must answer in HEROS:

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

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...

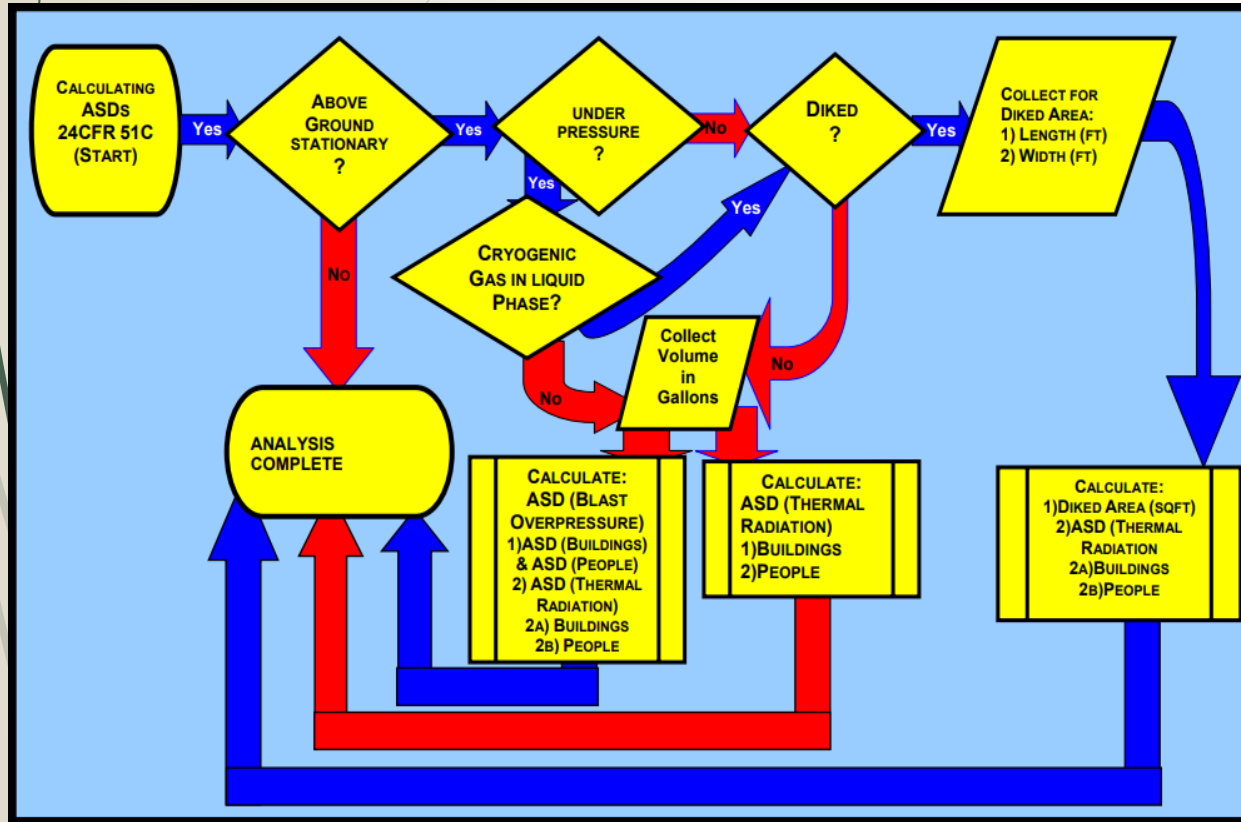
# Explosive and Flammable Hazards

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 of the site

# Explosive and Flammable Hazards

HUD Exchange ASD Calculation Flowchart



- If a container 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

The screenshot shows a web-based GIS application interface. At the top, there are tabs for 'Intro to Soils', 'Suitabilities and Limitations for Use', 'Soil Properties and Qualities', 'Ecological Sites', and 'Soil Reports'. Below the tabs is a search bar and a legend. The main map area is titled 'Map - Farmland Classification' and shows an aerial view of an urban area in Detroit. A red-shaded area in the southeast is labeled 'Urban'. The left sidebar contains a list of categories, including 'Suitabilities and Limitations Ratings', 'Land Classifications', and 'View Options'. The 'View Options' section has checkboxes for 'Map', 'Table', 'Description of Rating', and 'Rating Options', with 'Detailed Description' also visible. The 'Advanced Options' section is partially visible at the bottom.

- There is no prime farmland in the City of Detroit
- Obtain documentation from 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

- If none of the exemptions below apply, you must generate a floodplain map from FEMA's website using [this link](#)

## 1. Do any of the following exceptions apply? Select the applicable citation.

- 55.12(c)(3) The approval of financial assistance for restoring and preserving the natural and beneficial functions and values of floodplains and wetlands, including through acquisition of such floodplain and wetlands property, but only if:
- (i) The property is cleared of all existing structures and related improvements;
  - (ii) The property is dedicated for permanent use for flood control, wetlands protection, park land, or open space; and
  - (iii) A permanent covenant or comparable restriction is placed on the property's continued use to preserve the floodplain or wetlands from future development.

Upload covenant or comparable restriction in the Screen Summary at the conclusion of this screen.

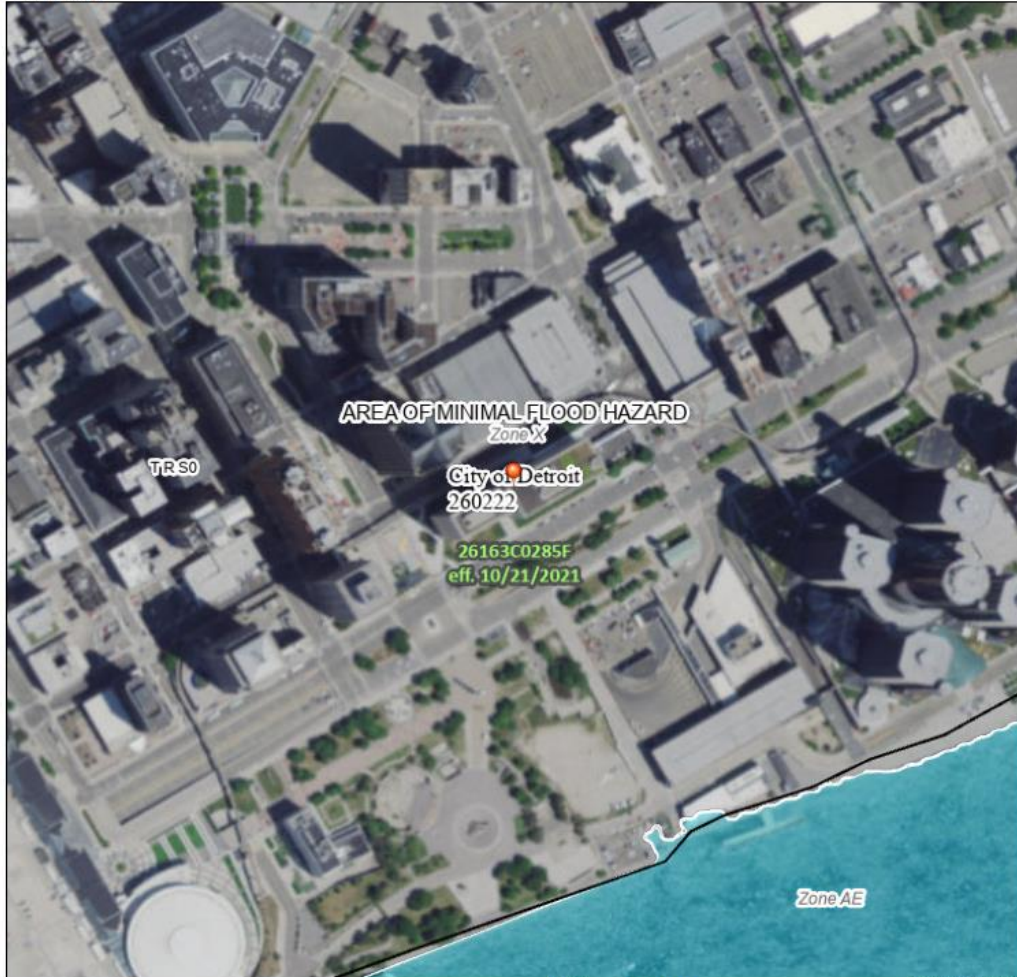
- 55.12(c)(4) An action involving a repossession, receivership, foreclosure, or similar acquisition of property to protect or enforce HUD's financial interests under previously approved loans, grants, mortgage insurance, or other HUD assistance.
- 55.12(c)(5) Policy-level actions described at 24 CFR 50.16 that do not involve site-based decisions.
- 55.12(c)(6) A minor amendment to a previously approved action with no additional adverse impact on or from a floodplain.
- 55.12(c)(7) HUD's approval of a project site, an incidental portion of which is situated in an adjacent floodplain, but only if all of the following apply:
- 55.12(c)(8) HUD's approval of financial assistance for a project on any nonwetland site in a floodplain for which FEMA has issued:
- (i) A final Letter of Map Amendment (LOMA) or final Letter of Map Revision (LOMR) that removed the property from a FEMA-designated floodplain location; or
  - (ii) A conditional LOMA or conditional LOMR if the HUD approval is subject to the requirements and conditions of the Conditional LOMA (CLOMA) or Conditional LOMR (CLOMR).
- 55.12(c)(9) Issuance or use of Housing Vouchers, Certificates under the Section 8 Existing Housing Program, or other forms of rental subsidy where HUD, the awarding community, or the public housing agency that administers the contract awards rental subsidies that are not project-based (i.e., do not involve site-specific subsidies).
- 55.12(c)(10) Special projects directed to the removal of material and architectural barriers that restrict the mobility of and accessibility to elderly and persons with disabilities.
- 55.12(c)(11) The approval of financial assistance for acquisition, leasing, construction, rehabilitation, repair, maintenance, or operation of ships and other water-borne vessels that will be used for transportation or cruises and will not be permanently moored.
- None of the above.

# Floodplain Management

## National Flood Hazard Layer FIRMette



83°2'56"W 42°2'07"N



**Legend**

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

**SPECIAL FLOOD HAZARD AREAS**

- Without Base Flood Elevation (BFE)  
Zone A, V, A99
- With BFE or Depth Zone AE, AO, AH, VE, AR
- Regulatory Floodway

**OTHER AREAS OF FLOOD HAZARD**

- 0.2% Annual Chance Flood Hazard. Area of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile. Zone X
- Future Conditions 1% Annual Chance Flood Hazard. Zone X
- Area with Reduced Flood Risk due to Levee. See Notes. Zone X

**OTHER AREAS**

- NO SCREEN Area of Minimal Flood Hazard. Zone X
- Area of Undetermined Flood Hazard. Zone C

**GENERAL STRUCTURES**

- Channel, Culvert, or Storm Sewer
- Levee, Dike, or Floodwall

**OTHER FEATURES**

- Cross Sections with 1% Annual Chance Water Surface Elevation
- Coastal Transect
- Base Flood Elevation Line (BFE)
- Limit of Study
- Jurisdiction Boundary
- Coastal Transect Baseline
- Profile Baseline
- Hydrographic Feature

**MAP PANELS**

- Digital Data Available
- No Digital Data Available
- Unmapped

The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards.

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 5/18/2023 at 4:18 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

- Projects that are in the unshaded Zone X area are not located in the floodplain
- Projects that are in the 500-year floodplain/0.2% annual chance floodplains (shaded Zone X or Zone B) are not required to complete the 8-step process unless they are critical actions (i.e. hospitals, nursing homes, police stations, fire stations and roadways providing sole egress from flood-prone areas).
- More information, see the [HUD Exchange](#)

# Floodplain Management

## National Flood Hazard Layer FIRMette



**Legend**

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

**SPECIAL FLOOD HAZARD AREAS**

- Without Base Flood Elevation (BFE)  
Zone A, V, A99
- With BFE or Depth Zone AE, AO, AH, VE, AR
- Regulatory Floodway

**OTHER AREAS OF FLOOD HAZARD**

- 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
- Future Conditions 1% Annual Chance Flood Hazard Zone X
- Area with Reduced Flood Risk due to Levee. See Notes. Zone X
- Area with Flood Risk due to Levee Zone D

**OTHER AREAS**

- NO SCREEN Area of Minimal Flood Hazard Zone X
- Effective LOMRs
- Area of Undetermined Flood Hazard Zone C

**GENERAL STRUCTURES**

- Channel, Culvert, or Storm Sewer
- Levee, Dike, or Floodwall

**OTHER FEATURES**

- 29.2 Cross Sections with 1% Annual Chance Water Surface Elevation
- 17.8 Coastal Transect
- Base Flood Elevation Line (BFE)
- Limit of Study
- Jurisdiction Boundary
- Coastal Transect Baseline
- Profile Baseline
- Hydrographic Feature

**MAP PANELS**

- Digital Data Available
- No Digital Data Available
- Unmapped


The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards.

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 5/18/2023 at 4:18 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

- Projects are prohibited from occurring in the floodways (Zone AE) or Coastal High Hazard Areas (Zone V1-30, VE or V)
- HUD strongly discourages the construction of buildings in the floodplain – properties in the Special Flood Hazard Zone/100-year floodplain (Zone A)
- If a project is in any of the above zones, please contact the ER Team to discuss the project
- If the project is moving forward despite being located in the SFHZ, the consultant is required to complete the 8-Step Process unless it is inapplicable per 55.12(B) or the 5-Step Process is applicable per 55.12(a)



# Section 106 Application

- A 36 CFR Part 61 qualified professional should complete the Section 106 application
- A finalized project description is necessary for applications, and should encompass all related project activities (new construction, rehab, demolition, parking lots, landscaping, etc.)
- Please allow a minimum of 14 days for review, or 45 days if archaeology is triggered



# Application instructions

- Applications are designed to ensure all information is collected for proper evaluation as outlined in 36 CFR Part 800 & the PA
- Be sure to include relevant project contacts, and any other federal funders (MSHDA, HUD, EPA, NPS, etc.)
- HRD application:  
<https://detroitmi.gov/document/section-106-review-application>
- Application Instructions:  
[https://detroitmi.gov/sites/detroitmi.localhost/files/2022-12/HRD%20Section%20106%20Application%20Instructions\\_2023.pdf](https://detroitmi.gov/sites/detroitmi.localhost/files/2022-12/HRD%20Section%20106%20Application%20Instructions_2023.pdf)
- Application Submittal:  
<https://app.smartsheet.com/b/form/1faa296eedac476a9fbf2ef1916ddb99>
  - PDFs should be unsecured
  - Files larger than 25MB can be e-mailed to [ciavattonet@detroitmi.gov](mailto:ciavattonet@detroitmi.gov)



# Define the Area of Potential Effect (APE)

- Determine the area of potential effect for the undertaking
- APE should include the area of direct effect (any ground disturbance or physical alterations) as well as the area of indirect effect (visual, audio, atmospheric; including traffic patterns and other effects on quality of living)
- *Scale of the APE should match the size and scope of the undertaking*



# Identify Historic Resources

- This includes any prehistoric or historic sites, districts, buildings, structures, objects, or landscapes listed in, or eligible for, the National Register of Historic Places
- Any determinations made through Section 106 should be supported by sufficient documentation to enable any reviewing parties to understand its basis. Please include copies of any pertinent resources used to identify historic properties, especially if they are hard to locate.



# Evaluate National Register of Historic Places Eligibility

Recommendations should be based on NRHP Criteria and historic integrity:

**Criteria A-** that are associated with events that have made a significant contribution to the broad patterns of our history;

**Criteria B-** that are associated with the lives of persons significant in our past

**Criteria C-** that embody distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction

**Criteria D-** that have yielded, or may be likely to yield, information important in prehistory or history





# 106 Application Submittal

- ▶ Upon submittal of a complete application, the PS will coordinate any additional consultation as required (SHPO/Tribal Consultation)
- ▶ The final determination of effect will be issued by the PS once all consultation is completed and should be included in the ERR



# Section 106 Determination of Effect

Section 106 Application and Determination Letter become part of the ERR

- NHPA-No Historic Properties Affected
  - Section 106 Review complete
- NAE- No Adverse Effect on Historic Properties
  - Section 106 Review complete
- CNAE- Conditional No Adverse Effect
  - No Adverse Effect depends on submittal of additional documentation such as: approval of final scope of work, results of phase II/III archaeology study, tax credit certifications, etc.
  - Any of these outstanding activities become a NEPA Continuing Compliance Commitment and are tracked through development



# Adverse Effects & 106 Mitigation

- ▶ Adverse Effect on historic resources make an undertaking ineligible for federal funds, unless mitigation can be agreed upon
  - ▶ An adverse effect may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register
  - ▶ It could diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.
  - ▶ Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance, or be cumulative
- ▶ Mitigation may give back to the community, enhance knowledge or protection of historic properties (Ex. Recordation package, architectural salvage, public interpretation, oral history documentation, etc.)
- ▶ Mitigation should accommodate the needs of all parties, especially those who ascribe value to the property
- ▶ Mitigation is developed through consultation and the creation typically results in creation of a Memorandum of Agreement (MOA) or Programmatic Agreement (PA) that is filed with the ACHP

# Useful Links for 106 Review

- ACHP PA/MOA template <https://www.achp.gov/sites/default/files/2018-06/GAD%20template%20MOA%202015.pdf>
- ACHP 106 Flowchart <https://www.achp.gov/sites/default/files/2019-10/106%20Flow%20Chart%20Handout.pdf>
- U.S. Bureau of Indian Affairs Tribal Leaders Directory <https://www.bia.gov/bia/ois/tribal-leaders-directory/>
- ACHP guidance NEPA and Section 106 integration [https://www.achp.gov/integrating\\_nepa\\_106](https://www.achp.gov/integrating_nepa_106)
- HUD Model Letters/Agreements <https://www.hudexchange.info/programs/environmental-review/historic-preservation/section-106-agreements/>
- SOI Treatment Guidelines <https://www.nps.gov/tps/standards.htm>
- Council on Environmental Quality *Citizens Guide to NEPA* <https://ceq.doe.gov/docs/get-involved/citizens-guide-to-nepa-2021.pdf>
- The National Congress of American Indians *Tribal Nations and the United States an Introduction* [https://www.ncai.org/tribalnations/introduction/Tribal Nations and the United States An Introduction-web-.pdf](https://www.ncai.org/tribalnations/introduction/Tribal+Nations+and+the+United+States+An+Introduction-web-.pdf)
- <https://detroitmi.gov/departments/planning-and-development-department/historic-district-commission-information/making-exterior-changes-within-local-historic-districts>



# Section 106 in HEROS

- Not one size fits all
- Refer to HUD exchange for additional guidance on [Historic Preservation](#)
- HEROS entry will look different depending on response to 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)].
    - COD NHPA Determination Letter
  - Yes, because the project includes activities with potential to cause effects (direct or indirect).
    - COD NAE or CNAE Determination Letter

# Section 106 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/THPO consultation

➤ Select “not required” if archaeology is not triggered

➤ Select “complete” if archaeology is triggered

➤ HRD will add tribes and upload supporting materials

## ➤ ACHP consultation is only required in instances of Adverse Effects

# Section 106 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 <input checked="" type="radio"/> /Location/District	National Register Status	SHPO Concurrence	Sensitive Information
<input type="text"/>	(not set) <input type="button" value="v"/>	(not set) <input type="button" value="v"/>	<input type="checkbox"/> Do not release
<input type="text"/>	(not set) <input type="button" value="v"/>	(not set) <input type="button" value="v"/>	<input type="checkbox"/> Do not release
<input type="text"/>	(not set) <input type="button" value="v"/>	(not set) <input type="button" value="v"/>	<input type="checkbox"/> Do not release
<input type="text"/>	(not set) <input type="button" value="v"/>	(not set) <input type="button" value="v"/>	<input type="checkbox"/> Do not release
<input type="text"/>	(not set) <input type="button" value="v"/>	(not set) <input type="button" value="v"/>	<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 APE- from Section 106 Report
- Fill in Address/Location/Districts- from 106 report
- Select “do not release” if an archaeology site is identified in the report
- 2. Was a survey or report done?
  - Yes, upload

# Section 106 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 box if an archaeology report is included with Section 106 application
- Select NHPA or NAE and document the determination as outlined Section 106 Determination Letter
- Does AE finding contain conditions?
  - Outline any conditions outlined in the 106 Determination Letter



# Section 106- 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:

**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

- Pull this summary from the Section 106 Determination Letter
- Upload 106 Determination Letter
- Upload Section 106 Application and Reports **only if archaeology is not included**
  - This is in order to protect sensitive site information

# Noise Abatement and Control

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](#)

- 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)
  - 1000 feet of a major roadway, 3,000 feet of a railroad, or 15 miles of a military or FAA-regulated civil airfield
- If the project has a "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.

# Noise Abatement and Control

Resources and assistance to support HUD's community partners

NEED HOUSING ASSISTANCE? Email Update

**HUD EXCHANGE**  
Secretary Ben Carson

My HUD Exchange Programs Resources Trainings Program Support Grants

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 ft <sup>2</sup>
Wall STC:	0

Aperture Statistics			
Aperture	Count	Area	% of wall
Windows:	0	0 ft <sup>2</sup>	0%
Doors:	0	0 ft <sup>2</sup>	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 checked="" type="button" value="Yes"/>

- 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. The STraCAT can be found using this [link](#)

- You must explain in HEROS why formal mitigation will not be required.

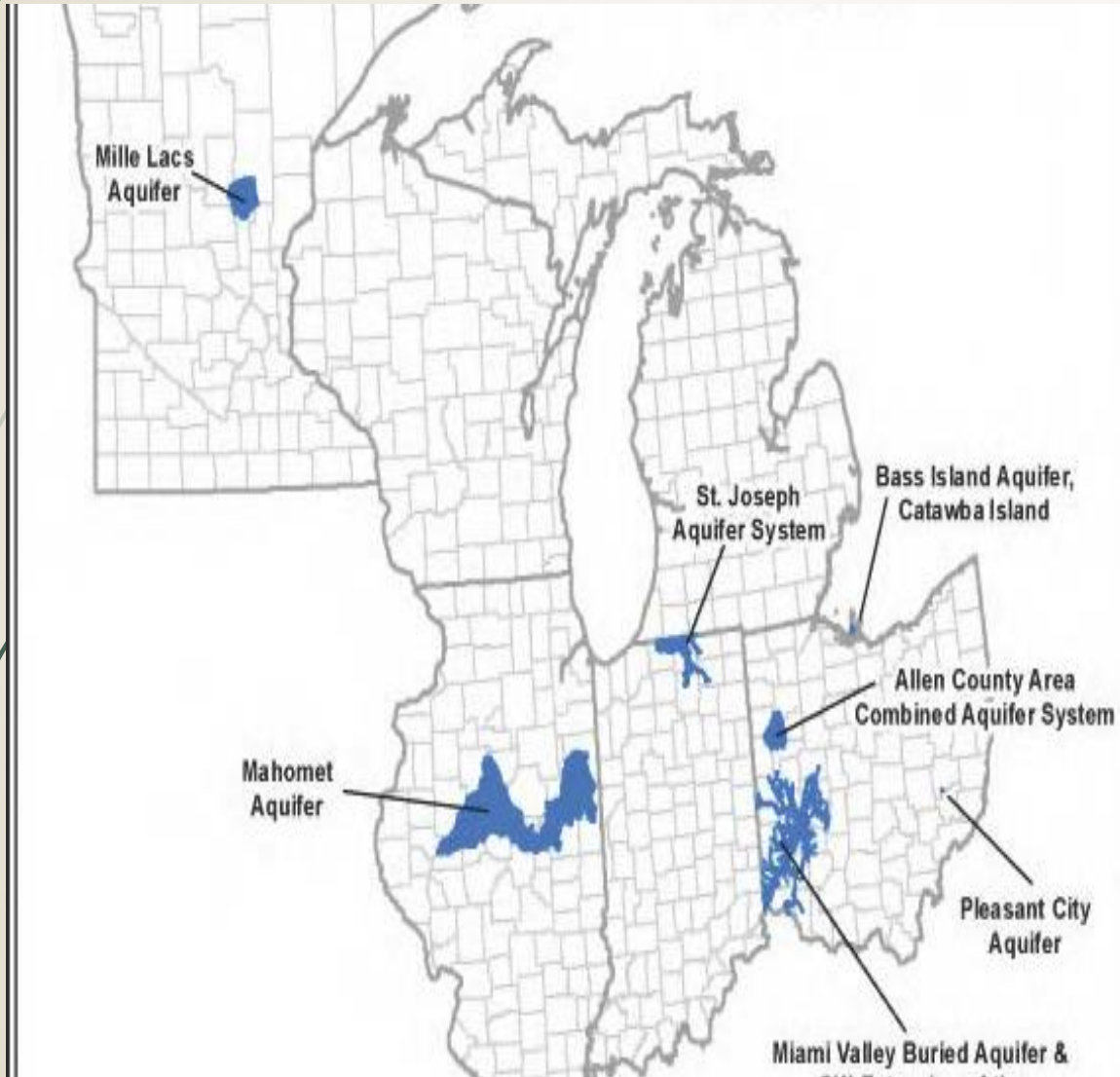
- The summary should include a description of the NAL location(s), the initial DNL calculation, the attenuation measures that will be incorporated into the project to reduce the interior noise and the final calculations

- Attach all calculations, the map of the NAL’s, the STraCAT and other additional documents in the HEROS review

# Noise Abatement and Control

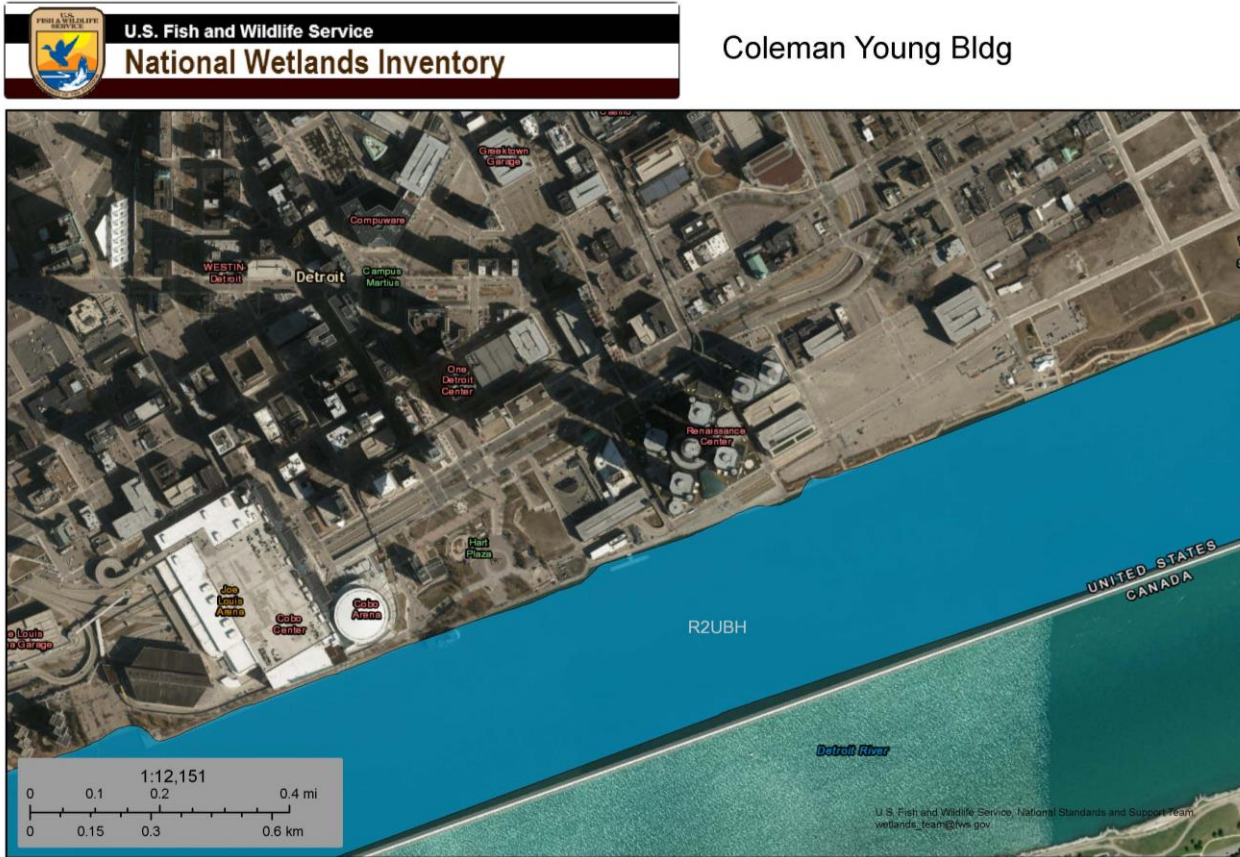
- If the project has an “unacceptable” (76+ dB), the project will be elevated to an Environmental Impact Statement and attenuation requirements for new construction must be approved by the Assistance Secretary of CPD or the Certifying Officer
- **Please contact the ER Team if the DNL is above 75 dB.**
- For more information, here is the link to the Noise Abatement and Control page on the [HUD Exchange](#)

# Sole Source Aquifers



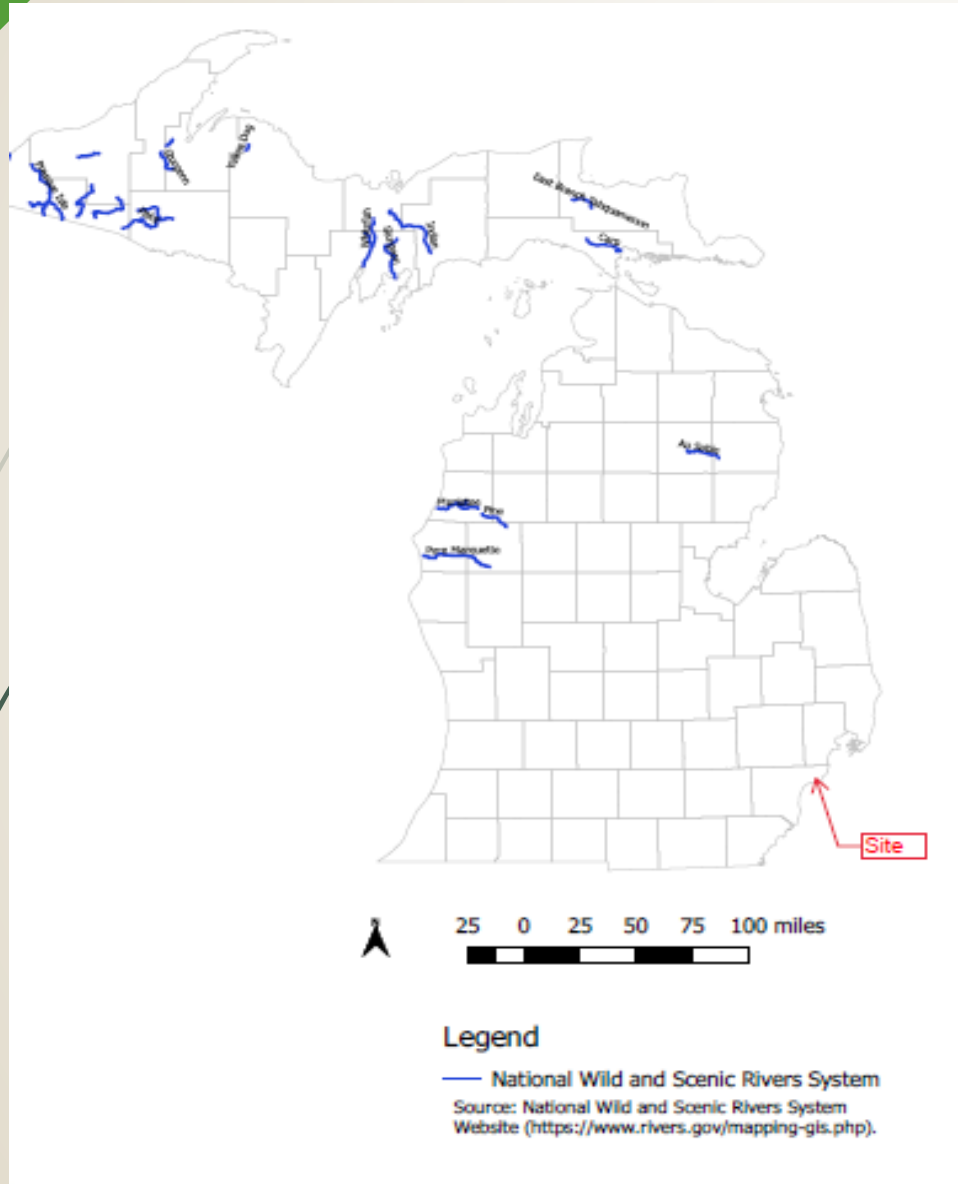
- There are no sole source aquifers in Detroit
- Obtain map from EPA using this [link](#) and attach in HEROS
- For more information, here is the link to the Sole Source Aquifer page on the [HUD Exchange](#)

# Wetland Protection



- The majority of projects will not be located in a wetland
- Obtain map from US Fish and Wildlife Service using this [link](#) or from EGLE using this [link](#) 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**
  - The consultant is responsible for completing the eight-step process on behalf of their client
- For more information, here is the link to the Wetlands Protection page on the [HUD Exchange](#)
- An overview of the eight-step process can be found [here](#)

# Wild and Scenic Rivers



- There are no Wild & Scenic rivers in the City of Detroit
- Obtain map from DNR using this [link](#) 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



United States Environmental Protection Agency

## EJSCREEN Report (Version 2018)



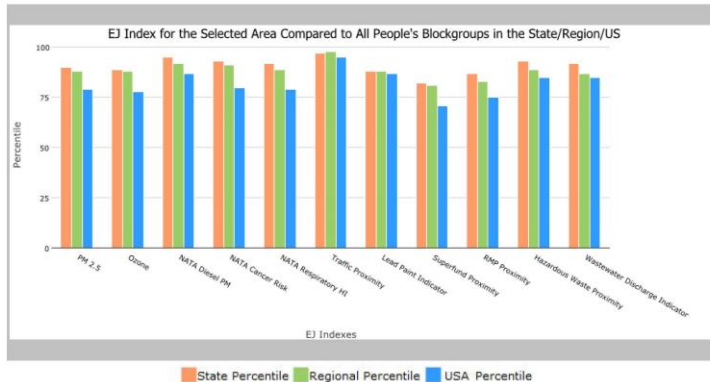
1 mile Ring Centered at 42.329805, -83.045402, MICHIGAN, EPA Region 5

Approximate Population: 11,858

Input Area (sq. miles): 3.14

2 Woodward Ave

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
<b>EJ Indexes</b>			
EJ Index for PM2.5	90	88	79
EJ Index for Ozone	89	88	78
EJ Index for NATA* Diesel PM	95	92	87
EJ Index for NATA* Air Toxics Cancer Risk	93	91	80
EJ Index for NATA* Respiratory Hazard Index	92	89	79
EJ Index for Traffic Proximity and Volume	97	98	95
EJ Index for Lead Paint Indicator	88	88	87
EJ Index for Superfund Proximity	82	81	71
EJ Index for RMP Proximity	87	83	75
EJ Index for Hazardous Waste Proximity	93	89	85
EJ Index for Wastewater Discharge Indicator	92	87	85



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

- Obtain information from EPA- EJScreen Report using this [link](#) and document in HEROS
- The report should be for a one-mile radius around the site
- For more information, here is the link to the Environmental Justice page on the [HUD Exchange](#)





# Components of the HUD Part 58 Environmental Review

## Environmental Assessment Factors

# Environmental Assessment 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



# Common Issues Related to EA Factors

- Common issues that arise while reviewing consultant EA Factors include:
  - Minimal information in the summaries
  - Missing documentation (such as maps)
  - Current pipe sizes for water/sewer not included
    - Site Development Plans
    - City Infrastructure Maps

# 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, both 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 in the preferred alternative requires an Environmental Impact Statement

# Environmental Assessment 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 planning area, 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?

# Environmental Assessment 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 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?

# Environmental Assessment 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

# Environmental Assessment 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



# Environmental Assessment 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?

# Environmental Assessment 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

# Environmental Assessment 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?

# Environmental Assessment 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

# Environmental Assessment 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

# Environmental Assessment Factor and Impact Evaluation

- Climate and Energy – HUD Hot Topic

- 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?

# Environmental Assessment 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



# 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 regardless of what agency (federal or non-federal) or person is involved. Cumulative impacts can result from individually minor but collectively significant actions taking place over time.
- **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:**
  - “All historical, local and federal contacts on the attached Interest Parties List were sent a copy of the Notice of Intent to Request for Release of Funds to use HUD funding for the project and were asked to comment on the project.”
  - 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
- **Summary of Findings and Conclusions:** Provide a detailed summary of finding and conclusions are the main points of analysis 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

- HUD now requires project with outstanding mitigation or conditions to create 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.
- The ER Team can send a mitigation plan outline for the consultant to use, though you are welcome to create your own
- The plan must be submitted to the City in the EA for review

# 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,  
Continuing Obligations



# Completing the Environmental Review

- When the report is complete, the consultant will:
  - Download a copy of the ERR for their records
  - Assign the review to Kim Siegel in HEROS
  - E-mail Kim to confirm that the report has been assigned to her in HEROS and provide Kim with a copy of the ER and attachments separately (you can use DropBox or a similar program)
- Kim will:
  - Review the report
    - If further information or documentation is required, Kim will send an e-mail
  - Begin the publication process (procurement, publication and public comment period)
  - Submit Request for Release of Funds to HUD
  - Get Authority to Use Grant Funds
  - Generates a NEPA Compliance Commitment memo & attaches Mitigation plan to memo



# Construction/ Closeout

- ER Team will work with the City of Detroit Construction Manager to ensure that mitigation measures and remedial actions are conducted throughout construction
- When applicable, the consultant will provide any relevant reports to the ER team
- **If unforeseen environmental conditions are observed during construction, please contact the ER Team immediately**
- Mitigation measures are reviewed and a final closeout memo will be issued prior to final payout from City of Detroit
- Sometimes mitigation measures must continue beyond final construction closeout. These measures will be outlined in a continuing obligations memo and will transfer from the Construction division to the Asset Management division of HRD. Typical continuing obligations include:
  - Remedial action documentation including an EGLE approved Documentation of Due Care Compliance (DDCC) Report
  - O&M Plans, inspection, and reporting requirements from the DDCC
  - Lead and Asbestos closeout reports and ongoing O&M Plans



# Access to Presentations

- Use this [link](#) and scroll to bottom of the page for links to each of the presentations

# Questions?

