

Completing an environmental review record (ERR) for a CDBG assisted project can be complicated. This guide is a tool which can be used to assist in ensuring the required steps, notices and actions are taken to properly completed an Housing Rehabilitation (HR) Tiered ERR which requires a Notice of Intent to Request Release of Funds (NOI-RROF) .

GETTING STARTED:

Resource Tools:

- Grant Management Handbook Chapter 3
- Environmental Checklist (Exhibit 3M)
- Completing Environmental Review (<http://portal.hud.gov/hudportal/HUD?src=/states/shared/working/r10/environment/oregon>) and go through the checklist for each law or authority
- Make sure to check under HUD Tribal Directory Assessment Tool for tribes with historic interest in the project site

Steps:

1. Send letters to interested tribes (use the HUD Tribal Directory Assessment tool) signed by Mayor/ highest elected official (30-day response period upon receipt)
2. Send letter to State Historic Preservation Office (SHPO).
3. Create a mailing log to document the response (or no response) along with any mitigation needed (and the appropriate mitigation actions)
4. Complete the individual topic area checklists on the above website and simultaneously fill in information to the Environmental checklist (Exhibit 3M)
5. Determine which topic areas will have to be completed during the site specific reviews, Tier 2

TIER #1

TRIBAL HISTORIC PRESERVATION OFFICE (THPO): The environmental checklist must identify the local tribes with interest in the project area, and include the initial letters sent by the grant recipient (Responsible Entity (RE)) and any responses. Refer to pages 3-33 to 3-36 and Exhibit 3P of the 2013 GMH.

- _____ ERR contains the Tribal Directory Assessment Tool (TDAT) print out for the federally recognized tribes in the project area
- _____ ERR contains identification of any non-federally recognized Tribes with interest in the project area
- _____ Tribal letters are/contain:
 - _____ Prepared using Exhibit 3Q of the GMH
 - _____ Printed on RE letterhead and signed by the RE
 - _____ Contain the RE’s initial determination “no historic properties present”, “no effect”, “no adverse affect”, “adverse affect” in the letter.
 - _____ Map of project area
 - _____ Project description
 - _____ Allow the Tribes 30-calendar days to respond, upon receipt of the letter

_____ Date letters were mailed to the Tribes (certified mail/return receipt or other documentation showing when the letters were received by the Tribe to start the 30-day response period.

_____ If Tribe does not respond in 30-days, RE can commence with completion of ERR.

_____ If Tribe responds, and does not concur with RE’s initial determination further consultation/negotiation/historical assessment/archeological investigations may be required. All must be completed and if necessary a Memorandum of Agreement executed **PRIOR** to the completion of the ERR and signature by the RE and **PRIOR** to dissemination of the NOI-RROF or the combined notice.

If the housing rehabilitation program allows alternation, repair or rehabilitation of historic properties further review must also be completed in the Tier 2, individual site specific review process.

STATE HISTORIC PRESERVATION OFFICE (SHPO): The environmental checklist must include written contact with SHPO and include the initial letters sent by the grant recipient (Responsible Entity (RE)) and any responses. Refer to pages 3-33 to 3-36 of the 2013 GMH.

_____ SHOP letters are/contain:

_____ Letters can be prepared by grant administrator, if the letters clearly states that the grant administrator is writing the letter on the RE’s behalf.

_____ Contain the RE’s initial determination “no historic properties present”, “no effect”, “no adverse affect”, “adverse affect” in the letter.

_____ Map of project area

_____ Project description

_____ Allow’s SHPO 30-calendar days to respond, upon receipt of the letter

_____ Date letters were mailed to SHPO (certified mail/return receipt or other documentation showing when the letters were received by SHPO to start the 30-day response period.

_____ If SHPO does not respond in 30-days the RE can commence with completion of the ERR

_____ If SHPO responds, and does not concur with RE’s initial determination further consultation/negotiation/historical assessment/archeological investigations may be required. All must be completed and if necessary a Memorandum of Agreement executed **PRIOR** to completion of the ERR and signature by the RE and **PRIOR** to dissemination of the NOI-RROF or the combined notice.

If the housing rehabilitation program allows alternation, repair or rehabilitation of historic properties further review must also be completed in the Tier 2, individual site specific review process.

FLOODPLAIN AND WETLANDS (8-STEP PROCESS):

Floodway –

- No rehabilitation work can be completed within a floodway.

Floodplain –

- If the rehabilitation program does not provide substantial (major rehabilitation i.e. rehabilitation of single family units exceeding 50% of the market value of the structure before rehabilitation) the program can be found exempt from the floodplain requirements, and compliance can be achieved on an area wide basis.

_____ A copy of the HR program policies, with the area highlighted, showing that the program is restricted to minor rehabilitation of single family owner occupied housing units, with no exceptions.

- If the rehabilitation program does provide substantial (major rehabilitation i.e. rehabilitation of single family units exceeding 50% of the market value of the structure before rehabilitation) and the area to be served by the HR project includes a floodplain, the 8-step process must be completed and included in the ERR. Refer to pages 3-36 to 3-38 and Exhibit’s 3L and 3O of the 2013 GMH. Once the 8-step process has been completed compliance can be achieved on an area wide basis.

_____ A copy of the HR program policies, with the area highlighted, showing that the program is allows major rehabilitation, or exceptions to the minor rehabilitation restriction for single family owner occupied housing units, with no exceptions.

_____ Documentation that the 8-step process was completed, see below for details.

Wetlands–

- If the area to be served by the HR project includes a federally designated wetland the required 8-step process must be completed and included in the ERR. However, if the written HR program policies do not allow the alteration or expansion of the footprint of ANY existing structure located in a wetland, with no exceptions, the recipient may not need to complete all 8-steps of the process and should complete steps, 1, 3, 4, 5, and 6. Once the 8-step process (partial or full, as applicable) has been completed compliance can be achieved on an area wide basis.

_____ Map of the federally designated wetlands in the HR project area.

_____ A copy of the HR program policies, with the area highlighted, showing that the program does not allow alteration or expansion of the footprint of ANY existing structure located in a wetland, with no exceptions. If so, only the partial 8-step process must be completed, see below for details; or

_____ A copy of the HR program policies, with the area highlighted, showing that the program allows alteration or expansion of the footprint of ANY existing structure located in a wetland. If so, the full 8-step process must be completed, see below for details.

8-Step Process -

_____ **STEP #1** - Determination whether proposed action is subject to the 8 step process, see notes above.

_____ **STEP #2** - Date first notice of a proposal to consider an action in the floodplain was advertised (Notice can be found in Exhibit 3O of the GMH).

_____ Notice allows 15 calendar days for comment.

_____ **STEP #3** - Identification and evaluation of practicable alternatives

_____ **STEP #4** - Identification of potential direct and indirect impacts associated with the occupancy or modification of the floodplain.

_____ **STEP #5** - Actions taken to minimize adverse impacts and preserve beneficial values of the floodplain

_____ **STEP #6** - Reevaluation of the proposed action to determine whether it is still practicable

_____ **STEP #7** - Publish second notice of decision to identify reasons why there is no practicable alternative and the mitigation measures to be taken. (Notice can be found in Exhibit 3O of the GMH).

_____ Notice allows 7 calendar days for comment

_____ **STEP #8** - Implement the proposed action with mitigating measures

COASTAL ZONE MANAGEMENT: If the housing rehabilitation program ONLY provides “minor rehabilitation” (i.e. rehabilitation of single-family units not exceeding 50% of the market value of the structure before rehabilitation) the program as a whole can be found to be in compliance with the Coastal Zone Management Act.

_____ The ER includes a copy of the HR program policies, with the area highlighted, which restrict HR to only minor rehabilitation with no exceptions.

_____ A map of the coastal zone showing the project site relative to the coastal zone, is included.

If the HR program allows exceptions to the minor rehabilitation restriction or allows major rehabilitation further compliance review with this requirement must also be completed in the individual site specific (Tier 2) review, on a case by case basis.

SOLE SOURCE AQUIFIERS:

- If the entire area to be served by the HR program does not contain a sole source aquifer, compliance with this requirement can be achieved on an area wide basis.
- If the area to be served by the HR program DOES contain a sole source aquifer and the written HR program policies DO NOT allow funding of septic tanks or private domestic wells compliance with this requirement can be achieved on an area wide basis.
- If the area to be served by the HR program DOES contain a sole source aquifer and the written HR program policies DO allow funding of septic tanks or private domestic wells, and the Responsible Entity makes a determination that the project will not affect Sole Source Aquifer quality compliance with this requirement can be achieved on an area wide basis.

Documentation needed:

_____ Documentation from EPA showing whether a sole source aquifer is present in the project area, from the EPA web site.

_____ If the area to be served has a sole source aquifer, the ER must include a copy of the HR program policies, with the area highlighted, showing whether septic tanks and private domestic wells are an eligible use of the CDBG funds.

_____ If the HR program policies do allow septic tanks or private domestic wells, the RE’s written determination that the project will not affect the sole source aquifer.

If the area to be served by the HR program DOES contain a sole source aquifer and the written HR program policies DO allow funding of septic tanks or private domestic wells, and the Responsible Entity cannot make a determination that the project will have no affect on the Sole Source Aquifer quality, further compliance review with this requirement must also be completed in the individual site specific (Tier 2) review, on a case by case basis.

ENDANGERED SPECIES ACT: This requirement generally applies to new construction, conversion of land use, major rehabilitation of existing buildings and the acquisition of undeveloped land. Most housing rehabilitation projects should not have an impact to sensitive species, unless landscaping or hazardous tree removal etc, is located in a defined riparian zone.

- If the area to be served by the HR program does not contain (have No Effect) any listed or proposed species and designated or proposed critical habitat (documented by ODFW) and the written HR program policies ONLY allow minor housing rehabilitation and do not allow CDBG funds to be used for new construction, conversion of land use, major rehabilitation or the acquisition of undeveloped land, landscaping or hazardous tree removal and none of the assisted properties will be located in a riparian zone, compliance with the requirement can be achieved on an area wide basis and consultation with the USFWS and/or NOAA Fisheries will not be required. Attach the:

_____ “No Effect” checklist to the ERR (Revised in 2016; please see HUD website for newest version.

<http://portal.hud.gov/hudportal/HUD?src=/states/shared/working/r10/environment/oregon>

_____ A copy of the HR program policies, with the area highlighted, showing that only minor rehabilitation is allowed (with no exceptions) and that the policies do not allow for new construction, conversion of land use, major rehabilitation, the acquisition of undeveloped land, landscaping or hazardous tree removal.

If the housing rehabilitation program cannot meet the above criteria, further compliance with this requirement must also be reviewed in the individual site specific (Tier 2) review, on a case by case basis.

WILD AND SCENIC RIVERS: All HUD funded projects are subject to these requirements. The environmental review must evaluate the potential for impact to any listed Wild and Scenic River when the housing rehabilitation program service area contains a Wild and Scenic River. This must be documented within the ER, provide a list of all the Wild and Scenic Rivers within the area to be served by the HR program.

If the HR program policies allow exceptions to the minor rehabilitation restriction or allows major rehabilitation this further review must also be completed in the individual site specific (Tier 2) review, on a case by case basis.

If the housing rehabilitation program only offers “minor rehabilitation” (i.e. rehabilitation of single-family units not exceeding 50% of the market value of the structure before rehabilitation) the program as a whole can be found to be in compliance with the Wild and Scenic Rivers Act on an area wide basis.

_____ The ERR includes a list of all Wild and Scenic Rivers within the project area

_____ The ERR includes a copy of the HR program policies, with the area highlighted, showing whether the program is restricted to only minor rehabilitation (with no exceptions).

CLEAN AIR ACT: Check the current DEQ listed non-attainment areas.

- If the funded housing rehabilitation program service area includes any air quality non-attainment areas, this review and determination must be made for the program as a whole and compliance should be able to be achieved on an area wide basis.

_____ DEQ list of non-attainment areas within the HR project area.

_____ RE’s written determination that the program as a whole will have no effect on the on-attainment area air quality.

- If the area to be served by HR program does not contain a non-containment area, compliance with the requirement can be made on an area wide basis.

_____ DEQ list of non-attainment areas within the HR project area.

FARM LAND PROTECTION ACT:

- If the housing rehabilitation program does not convert farmland to non-agricultural purposes the program can be found to be in compliance with the Farmland Protection Act, and compliance can be achieved on an area wide basis.

_____ The ERR include information regarding farmland compliance in either the “Project Description” or in attached HR program policies, with the area highlighted showing compliance.

If compliance cannot be achieved on an area wide basis above, further review must also be completed in the individual site specific (Tier 2) review, on a case by case basis.

ENVIRONMENTAL JUSTICE: This regulation ensures that the environment and human health are fairly protected for all people regardless of race, color, national origin or income (minority populations and low-income populations). Generally this Order applies to low-income or minority neighborhoods where the project contains acquisition of existing housing, acquisition of land for development and new construction.

If the written CDBG funded housing rehabilitation program policies identify that acquisition of existing housing, acquisition of land for development and new construction are not eligible for assistance under the program and the RE determines that since the project is for rehabilitation of existing units and that LMI participants reside in the units therefore there will be no disproportionate impact to minority or low and moderate income persons. This conclusion must be supported within the “Project Description”. Under this circumstance, compliance can be achieved on an area wide basis.

- _____ A copy of the HR program policies, with the area highlighted, identifying that acquisition of existing housing, acquisition of land for development and new construction are not eligible for assistance
- _____ A written determination from the RE that since the project is for rehabilitation of existing units and that LMI participants reside in the units therefore there will be no disproportionate impact to minority or low and moderate income persons.
- _____ The RE conclusion is identified under “Project Description” of the ERR.

If compliance cannot be achieved on an area wide basis above, further review must also be completed in the individual site specific (Tier 2) review, on a case by case basis.

NOISE ABATEMENT AND CONTROL: Housing is considered a noise sensitive use, so if the housing rehabilitation program allows for the modernization of housing units (rehabilitation is considered modernization) and the assisted housing unit is located near a potential noise source (rail road, highway, airport, industry, construction site etc.) this review must be completed.

Since the exact location of the specific housing units to be assisted with this HR project are not identified, compliance with this requirement must be determined in the individual site specific (Tier 2) review, on a case by case basis.

EXPLOSIVE AND FLAMMABLE OPERATIONS: For explosive and flammable operations, housing rehabilitation of owner occupied single family residential units is not considered to increase residential densities, convert a building for habitation or make a vacant building habitable. Provide a copy of the CDBG HR program policies that restricts the use of CDBG funds to only owner occupied single family residential units. Compliance with this requirement can be achieved on an area wide basis. Provide information to support this conclusion with the “Project Description”.

- _____ A copy of the CDBG HR program policies, with the area highlighted, showing that the policies restrict the use of CDBG funds to only owner occupied single family residential units.
- _____ The written “Project Description” of the ERR, concurs with HR program policies limiting the HR program to only owner occupied single family residential units.

TOXIC CHEMICALS AND RADIOACTIVE MATERIALS: If the specific housing rehabilitation unit to be assisted under the HR program has hazardous materials located on or within the property (residential heating oil tanks etc.) contamination, toxic chemicals and gasses (residential propane tanks) and radioactive substances or is located near (EPA superfund site, landfill, brownfield, underground storage tank clean-up etc.) this review cannot be completed on an area wide basis.

Since the specific housing units to be assisted with this HR project are not identified, compliance with this requirement must be determined in the individual site specific (Tier 2) review, on a case by case basis.

AIRPORT CLEAR ZONES AND ACCIDENT POTENTIAL ZONES:

- If the written housing rehabilitation program policies prohibit major rehabilitation and only minor rehabilitation is allowed compliance with this requirement can be obtained with an area-wide basis.

_____ A copy of the HR programs, with the area highlighted, showing that the program is restricted to minor rehabilitation with no exceptions.

If the housing units to be assisted with CDBG funds could be located within 2,500 feet of a civil primary and/or commercial airfield, or 15,000 feet of a military airfield and the HR program allows major rehabilitation, this review must be completed on the site specific (Tier 2) review, on a case by case basis.

FLOOD DISASTER PROTECTION ACT: If a housing unit to be assisted is located within a 100-year flood plain, which will be documented with a FEMA map panel number and date, the RE must ensure that the homeowner has proof of flood insurance before improvements are made to the housing unit. This review cannot be completed on an area wide basis.

Since the specific housing units to be assisted with this HR project are not identified, compliance with this requirement must be determined in the individual site specific (Tier 2) review, on a case by case basis.

COASTAL BARRIER RESOURCES ACT: There are no Coastal Barrier Resource Area’s in Oregon. Therefore the Act does not apply and compliance can be achieved on an area wide basis.

Recommend that recipient uses the HUD Specialized Checklist for each topic area below. The checklist can be found on HUD's web site at:
<http://portal.hud.gov/hudportal/HUD?src=/states/shared/working/r10/environment/oregon>

STATUTORY CHECKLIST:

The responses/information obtained/documentation of completion of the: the general letters, 8-Step process; THPO; and, SHPO and other regulatory requirements items listed above **MUST** be incorporated into the ERR checklist, and all corresponding mitigating actions **MUST** be incorporated into the ERR. Does the ERR checklist contain:

- _____ Project name
- _____ Project description, (must include activities whether funded with CDBG funds or non-CDBG funds)
- _____ A description of the physical project location, addresses and maps, etc
- _____ Statement of the process and status of environmental analysis:
 - _____ Description of the persons involved in the preparation of the ERR, including RE staff, consultants, other agencies and the public
 - _____ When applicable this section will also include a written decision on the use of prior environmental reviews
- _____ List of participants to the assessment – List major participants, their titles and roles
- _____ A summary of existing environmental conditions according to the seven primary impact areas:
 - _____ Land development
 - _____ Noise
 - _____ Air Quality
 - _____ Environmental design and historic values
 - _____ Socioeconomic characteristics
 - _____ Community facilities and services
 - _____ Natural features
- _____ A summary of the existing environmental conditions
- _____ Identification of the process that will be used in the individual site specific reviews, along with the forms to be used for the Tier 2 process
- _____ A complete statutory checklist:

<p>LAW/AUTHORITY</p>	<p>Documentation shows how RE came to conclusion</p> <p><u>Enter YES below</u></p>	<p>Documentation <u>does not</u> show how RE came to conclusion</p> <p><u>Enter NO below</u></p>	<p>SOURCE DOCUMENTS: All items on the checklist MUST have source documentation (from the appropriate regulatory source) that supports the RE’s conclusion for that item. All documents must be attached to the ERR and their location within the ERR identified in the checklist. Such as:</p> <ul style="list-style-type: none"> • Letters, emails, phone logs/notes with representatives of implementing regulatory agencies • Copies of city/county ordinances or resolutions, sub-grantee housing rehabilitation policies for each item on the checklist. • All communications • Copies of public/community requests for information • Environmental objections received • Record of site visits and meetings, including a list of attendees <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p><i>The comments in this column below are suggestions on where the recipient may start to locate compliance documentation.</i></p> </div>
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ENVIRONMENTAL ASSESSMENT WORKSHEET

<p>Historic Preservation</p>			<p>All SHPO/THPO consultation documents, cultural monitoring reports, pedestrian survey’s (pre-existing documents or documents prepared as result of this EA) and HR program policies.</p> <p>NOTE: If the housing rehabilitation program allows alternation, repair or rehabilitation of historic properties FURTHER review must ALSO be completed in the Tier 2, individual site specific review process, on a case by case basis.</p>
<p>Floodplain Management</p>			<p>FEMA maps showing the HR project area relative to the floodplain. Documentation of the required 8-step process was completed if needed. HR program policies.</p>
<p>Wetland Protection</p>			<p>Division of State Lands (DSL) general letter/response. A map of Federally designated wetlands in the project area showing the project site relative to the wetlands. Documentation of the required 8-step process, if needed. HR program Policies.</p>
<p>Coastal Zone Management</p>			<p>Coastal Zone Atlas and Department of Land Conservation and Development (DLCD). A map of the coastal zone showing the project site relative to the coastal zone. HR program policies.</p> <p>NOTE: If the HR program allows exceptions to the minor rehabilitation restriction or allows major rehabilitation compliance with this requirement FURTHER review must ALSO be completed in the individual site specific (Tier 2) review, on a case by case basis.</p>
<p>Sole Source Aquifers</p>			<p>EPA documentation from the sole source aquifer web site. HR program</p> <p>NOTE: If the area to be served by the HR program DOES contain a sole source aquifer and the written HR program policies DO allow funding of septic tanks or private domestic wells, and the Responsible Entity cannot make a determination that the project will have no affect on the Sole Source Aquifer quality, FURTHER review of this requirement must ALSO be completed in the individual site specific (Tier 2) review, on a case by case basis.</p>
<p>Endangered Species</p>			<p>General letters/responses to NMFS, USFWS, ODFW, pre-existing biological assessments or biological assessments prepared as result of this EA and any other relevant information. Such as list of threatened or endangers plant or wildlife</p>

			<p>species. Documentation from ODFW that the project will have no effect, no effect checklist and HR program policies.</p> <p>NOTE: If the housing rehabilitation program cannot meet the above criteria, FURTHER compliance with this requirement must ALSO be reviewed in the individual site specific (Tier 2) review, on a case by case basis.</p>
Wild and Scenic Rivers			<p>DEQ or the National Park Service for a list of designated rivers within the HR project area. HR program policies.</p> <p>NOTE: If the HR program policies allow exceptions to the minor rehabilitation restriction or allows major rehabilitation this FURTHER review must ALSO be completed in the individual site specific (Tier 2) review, on a case by case basis.</p>
Clean Air Act			<p>DEQ general letter/response. List of current Oregon non-attainment area’s from DEQ, within the HR project area.</p>
Farmland Protection Policy Act			<p>General letter/response from USDA – NRCS, DLCD and Local Comprehensive Land Use Plan. Local zoning ordinances, resolutions or policies. HR program policies.</p> <p>NOTE: If compliance cannot be achieved on an area wide basis above, FURTHER review must ALSO be completed in the individual site specific (Tier 2) review, on a case by case basis.</p>
Environmental Justice			<p>Documentation on whether the project will have an adverse effect on minority and or LMI persons, See GMH Page 3-42. HR program policies.</p> <p>NOTE: If compliance cannot be achieved on an area wide basis above, FURTHER review must ALSO be completed in the individual site specific (Tier 2) review, on a case by case basis.</p>
Noise Abatement Control			<p>This review cannot be completed on an area wide basis and must be completed in the individual site specific (Tier 2) review, on a case by case basis.</p>
Explosive and Flammable Operations			<p>HR program policies.</p>
Toxic Chemicals and Radioactive Materials			<p>This review cannot be completed on an area wide basis and must be completed in the individual site specific (Tier 2) review, on a case by case basis.</p>
Airport Clear Zones and Accident Potential Zones			<p>Maps/information identifying the location and type of airports within the HR project area project HUD web site regarding airports. HR program policies.</p>
Flood Disaster Protection Act			<p>This review cannot be completed on an area wide basis and must be completed in the individual site specific (Tier 2) review, on a case by case basis.</p>
Coastal Barriers Act			<p>There are no coastal barrier resource area’s in Oregon</p>

- _____ A discussion and comparison of the alternatives considered in addition to the proposed project activities
- _____ A complete analysis of the impacts
- _____ A complete list of the mitigation actions necessary, and identification how each mitigating action will be achieved
- _____ A description of the individual site specific review process/procedures and copies of the forms to be used for the Tier 2 process.

- _____ A description of the monitoring and enforcement procedures and post environmental review actions the RE will implement to ensure compliance with the ERR.
- _____ Copies of any other relevant correspondence and notifications:
 - _____ Official notification letters providing environmental data
 - _____ Community requests for information
 - _____ Copies of environmental objections/comments
 - _____ Record of site visits and important meetings, including:
 - _____ List of attendees
 - _____ Meeting minutes
- _____ RE’s determination of a FONSI or significant impact
- _____ Date RE signed checklist
 - _____ Signed by RE’s chief elected official; or
 - _____ If signed by someone other than the RE’s chief elected official there must be documentation that the RE officially designated and authorized another staff person of the RE, by the city council or county board of commissioners **(resolution and or meeting minutes must be in the ERR)** as the federal certifying officer.
 - _____ Checklist **MUST** be signed before the NOI-RROF or the combined notice is disseminated (published, mailed etc.).

NOTICE OF INTENT TO REQUEST RELEASE OF FUNDS (NOI-RROF): Exhibit 3N of the GMH

- _____ The dates within the NOI-RROF are accurate:
 - _____ Request for Release of Funds - **Must** be at least one day after the local governments 7 day if advertised or 10 day if posted local comment period. Date within Notice _____
 - _____ Public Comments – **Must** be the local governments 7 day if advertised or 10 day if posted comment period. Date within Notice _____
 - _____ Objections to Release of Funds – **Must** the projected date in which OBDD-IFA could issue the ROF and includes the 7 or 10 local comment period, a few days to add public comments received to the ERR and send the entire ERR to OBDD-IFA and the state’s 15 day public comment period. Date within Notice _____
- _____ NOI-RROF was published or posted **AFTER** the ERR checklist was signed. Date Notice was advertised or posted _____
- _____ Evidence of publication and/or certification of posting is included in the ERR.
 - _____ Affidavit of Publication, including copy of notices that was published
 - _____ Written and signed certificate of posting, documenting:
 - _____ Location(s) notice was posted
 - _____ Date(s) the notice was posted
 - _____ Who actually posted the notice

- _____ A copy of what was posted
- _____ NOI-RROF was mailed to interested parties:
 - _____ Individuals or groups known to be interested such as ODFW, USFWS, SHPO, THPO, DEQ state and federal agencies, etc
 - _____ The local news media
 - _____ EPA
 - _____ HUD
 - _____ Other, Identify _____
- _____ Comments received by the RE, during the local comment period must be addressed by the RE and all comments and responses included in the ERR, **BEFORE** the ERR and RROF is sent to OBDD-IFA.

REQUEST FOR RELEASE OF FUNDS: Exhibit 3H of the GMH

- _____ Date RROF was signed by RE’s certifying Officer. It **MUST** be signed after the first 7 or 10 day local comment period has concluded.
- _____ Date OBDD-IFA received the full ERR and RROF.

RELEASE OF FUNDS:

- _____ Date OBDD-IFA issued the ROF