

**Housing Rehabilitation Environmental Review  
Incorporating The 8-Step Floodplain Process  
Substantial Rehabilitation**

Rehabilitation of single-family units exceeding 50% of the market value of the structure before rehabilitation

CDBG Award	
Grant Contract signed by all parties	
Complete Determination of Exemption – Exhibit 3C for grant administration, environmental and program management activities.	
County sub-grant to eligible non-profit	
Start HR environmental tiered review Exhibit 3M	
Start completing the Statutory Checklist (Categorical Exclusion) for the HR program as a whole.	
	If the geographical area where the HR program services will be provided includes a 100 year - flood plain the applicant must complete the 8-step process for activities within a flood plain as part of the statutory worksheet. There are two public notices required as part of the 8-step process.
	Notice 1 – The project proponent must publish the notice attached as <b>Attachment A</b> . The notice must be published once and must allow the collect public comment for a period of 15 days. [Note – The applicant may publish this notice with the required first CDBG Public Hearing. It must be obvious that the published notice is accomplishing two tasks: 1) First CDBG Public Hearing and, 2) First Flood Plain Notice.
	Notice 2 – The project proponent must publish the notice attached as <b>Attachment B</b> . The notice must be published once and must allow public comment for a period of 7 days.
Complete documentation to demonstrate 8-step process has been completed.	
Complete the statutory checklist and obtains proper signatures. Refer to Exhibit 3M-2.	
	Publish the Notice of Intent to Request Release of Funds (NOI-RROF)– Exhibit 3N is either published or posted in accordance with the timelines in Exhibit 3I
	Send the entire environmental review record (completed statutory worksheet and all attachments) and the Request for Release of Funds (RROF) Exhibit 3H to OBDD for review.
	Upon satisfactory state review, the state issues the Release of Funds (ROF) for the HR program as a whole.
Prior to the project proponent completing rehab services for each loan a site specific review must be completed and placed in the loan docket. The site-specific review forms are contained in Exhibit 3M.	
	It must be determined whether a housing unit is in a 100-year floodplain and source documentation identified by FEMA map panel number and date must be in the file. If a project is located in a 100-year floodplain, evidence must be provided that the homeowner has flood insurance.

Attachment A  
Early Notice

<https://www.hudexchange.info/resource/3191/early-notice-and-public-review-of-a-proposed-activity-floodplain/>

**Early Notice and Public Review of a Proposed  
Activity in a [100-Year/500-year Floodplain or Wetland]**

**[Note: May also be combined with other notices such as state floodplain or wetland notices so long as it contains the required information]**

To: All interested Agencies **[include all Federal, State, and Local]**, Groups and Individuals

This is to give notice that **[HUD under part 50 or Responsible Entity under Part 58]** has determined that the following proposed action under **[Program Name]** and **[HUD grant or contract number]** is located in the **[100-year/500-year floodplain/wetland]**, and **[HUD or the Responsible Entity]** will be identifying and evaluating practicable alternatives to locating the action in the **[floodplain/wetland]** and the potential impacts on the **[floodplain/wetland]** from the proposed action, as required by **[Executive Order 11988 and/or 11990]**, in accordance with HUD regulations at 24 CFR 55.20 Subpart C Procedures for Making Determinations on Floodplain Management and Protection of Wetlands. **[Describe the activity, e.g. purpose, type of assistance, the size of the site, proposed number of units, size of footprint, type of floodplain/wetland, natural and beneficial values potentially adversely affected by the activity]. [State the total number of acres of floodplains/wetland].** The proposed project(s) is located **[at addresses]** in **[Name of City]**, **[Name of County]**.

There are three primary purposes for this notice. First, people who may be affected by activities in **[floodplains/wetlands]** and those who have an interest in the protection of the natural environment should be given an opportunity to express their concerns and provide information about these areas. Commenters are encouraged to offer alternative sites outside of the **[floodplain/wetland]**, alternative methods to serve the same project purpose, and methods to minimize and mitigate impacts. Second, an adequate public notice program can be an important public educational tool. The dissemination of information and request for public comment about **[floodplains/wetlands]** can facilitate and enhance Federal efforts to reduce the risks and impacts associated with the occupancy and modification of these special areas. Third, as a matter of fairness, when the Federal government determines it will participate in actions taking place in **[floodplains/wetlands]**, it must inform those who may be put at greater or continued risk.

Written comments must be received by **[HUD or Responsible Entity]** at the following address on or before **[month, day, year] [a minimum 15 calendar day comment period will begin the day after the publication and end on the 16<sup>th</sup> day after the publication]: [HUD or Responsible Entity], [Address] and [phone number], Attention: [Name of Certifying Officer or designee], [Title].** A full description of the project may also be reviewed from **[enter available office hours]** at **[address or state address is same as above] and [web address if available].** Comments may also be submitted via email at **[email address].**

**Date:**

Attachment B  
Final Notice

<https://www.hudexchange.info/resource/3191/early-notice-and-public-review-of-a-proposed-activity-floodplain/>

**Final Notice and Public Explanation of a Proposed Activity in a [100-Year/500-year Floodplain or Wetland]**

To: All interested Agencies **[include all Federal, State, and Local]**, Groups and Individuals

This is to give notice that the **[HUD under part 50 or Responsible Entity under Part 58]** has conducted an evaluation as required by **[Executive Order 11988 and/or 11990]**, in accordance with HUD regulations at 24 CFR 55.20 Subpart C Procedures for Making Determinations on Floodplain Management and Wetlands Protection. The activity is funded under the **[Program Name]** under **[HUD grant or contract number]**. The proposed project(s) is located **[at addresses]** in **[Name of City]**, **[Name of County]**. **[Describe the activity, e.g. purpose, type of assistance, the size of the site, proposed number of units, size of footprint, type of floodplain/wetland, natural values]**. **[State the total number of acres of floodplains/wetland involved]**.

**[HUD or Responsible Entity]** has considered the following alternatives and mitigation measures to be taken to minimize adverse impacts and to restore and preserve natural and beneficial values: **[List (i) ALL of the reasons why the action must take place in a floodplain/wetland, (ii) alternatives considered and reasons for non-selection, (iii) all mitigation measures to be taken to minimize adverse impacts and to restore and preserve natural and beneficial values]** **[Cite the date of any final or conditional LOMR's or LOMA's from FEMA where applicable]** **[Acknowledge compliance with state and local floodplain/wetland protection procedures]**

**[HUD or Responsible Entity]** has reevaluated the alternatives to building in the **[floodplain/wetland]** and has determined that it has no practicable alternative. Environmental files that document compliance with steps 3 through 6 of **[Executive Order 11988 and/or 11990]**, are available for public inspection, review and copying upon request at the times and location delineated in the last paragraph of this notice for receipt of comments.

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Written comments must be received by the **[HUD or Responsible Entity]** at the following address on or before **[month, day, year]** **[a minimum 7 calendar day comment period will begin the day after the publication and end on the 8<sup>th</sup> day after the publication]**: **[Name of Administrator]**, **[Address]** and **[phone number]**, Attention: **[Name of Certifying Officer or designee]**, **[Title]**. A full description of the project may also be reviewed from **[enter available office hours]** at **[address or state address is same as above]** and **[web address if available]**. Comments may also be submitted via email at **[email address]**.

Date: