

Exhibit H
National Housing Trust Fund ONLY Awards

The Environmental Requirements for new construction and rehabilitation for Housing Trust Fund (HTF) projects under the Property Standards at 24 CFR § 93.301(f)(1) and (2) are similar to Part 50 and 58 Requirements for other HUD-funded projects, but there are some differences. Projects requesting only HTF funding should meet the requirements below.

Projects requesting only HTF, and not in combination with other HUD sources, will require no level of review (same as CEST or Exempt Activity), no public comment period, and no request for release of funds and certification.

Application/Award #
 Project Name:
 Project Address:
 Funding Amount:
 Grant Number:

PART I: HTF Environmental Provisions Consistent with 24 CFR Parts 50 and 58 [24 CFR § 93.301(f)(1) and (2)]

The following sections of the ERR Workbook, Exhibit G must be filled out.

ERR Workbook	Requirement	Source Documentation	Requirement Met
Exhibit G, Part 1-1	The Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994	Color FEMA Map with project site identified	<input type="checkbox"/> Yes <input type="checkbox"/> No
Exhibit G, Part 2-1	Compliance with Applicable Plans	Zoning Map/Letter; IDNR Letter (if applicable); IDEM Letter (if applicable)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Exhibit G, Part 2-2	Sole Source Aquifers	EPA Letter (if applicable)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Exhibit G, Part 2-4	Endangered Species	Aerial site photos, site photos, endangered species lists	<input type="checkbox"/> Yes <input type="checkbox"/> No
Exhibit G, Part 2-5	Wild and Scenic Rivers	Wild and Scenic River pdf page	<input type="checkbox"/> Yes <input type="checkbox"/> No
Exhibit G, Part 3-2	Explosive and Flammable Operations	Map and Acceptable Distance Worksheet (if applicable)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Exhibit G, Part 3-4	Protection of Wetlands	NWI and USDA Maps with project location identified	<input type="checkbox"/> Yes <input type="checkbox"/> No

PART II: Additional HTF Environmental Provisions [24 CFR § 93.301(f)(1) and (2)]

2-1. Airport Hazards

24 CFR § 93.301(f) requires that HTF project activities are not permitted within the runway protection zones of civilian airports or the clear zones or accident potential zones of military airfields.

Is the project within 2,500 feet from the end of a runway at a civil airport or within 15,000 feet from the end of a runway at a military airport?

Yes No

If YES, stop and consult IHADA.

Comments:

Source documentation: (1) Attach a color map showing the project location and the location of any civil airports or military airfields, along with their approximate distance from the project site.

2-2. Safe Drinking Water

The Safe Drinking Water Act of 1974 requires protection of drinking water systems that are the sole or principal drinking water source for an area and which, if contaminated, would create a significant hazard to public health.

Is the potable water system using only lead-free pipes, solder, and flux?

Yes No N/A

If NO, the project is ineligible for NHTF funding. If YES, provide plans and specs to show the type of pipes, solder, and flux.

Comments:

Source Documentation: Attach architectural plans, product specs, etc.

2-3. Farmland Protection

The aim of the Farmland Protection Policy Act (FPPA) (7 U.S.C. 4201 et seq, implementing regulations 7 CFR Part 658, of the Agriculture and Food Act of 1981, as amended) is to minimize the effect of federal programs on the unnecessary and irreversible conversion of farmland to nonagricultural uses. Farmland subject to FPPA requirements does not have to be currently used for cropland.

Does your project include new construction, acquisition of undeveloped land, or conversion of land use that could potentially convert agriculture land to a non-agricultural use?

Yes No

If YES, continue to next question. If NO, explain how you determined that agricultural land would not be converted. Provide any documentation to support your answer. You are finished with this section.

If YES, is the project land designated as "urbanized" on the Census Bureau map? Create and submit the map to support your answer. You are finished with this section. If NO, continue to the next question.

Yes No

Is "important farmland" on the project site? Important farmland includes prime farmland, unique farmland, or farmland of statewide or local importance regulated under the FPPA. Refer to Appendix 3 to determine "important farmland."

Yes No

If NO, include maps and other documentation that proves no "important farmland" is on site. You are finished with this section.

If YES, stop and consult IHADA. The NHTF project must not result in the conversion of unique, prime, statewide or locally significant agricultural properties to urban uses. No mitigation efforts are allowed under the NHTF program.

Comments:

Source Documentation: (1) If applicable, attach any documentation to show that your project is not converting agricultural land to another use. (2) For land already committed to urban development, provide the census map (see Appendix 3, Resources). (3) Maps and other documentation to proves no "important farmland" is on site (see Appendix 3, Resources).

2-4. Noise Abatement and Control

HUD's noise standards are found at [24 CFR Part 51, Subpart B](#). The regulations protect new construction and rehabilitation residential properties from excessive noise exposure. HUD encourages mitigation to noise as appropriate.

Normal accepted ranges for noise is less than 65 dB. If the exterior noise level is between 65 dB and 75 dB, mitigation measures must be implemented to meet the interior noise level standards of no more than 45 dB. If there are exterior noise levels of 75 dB or greater, mitigation measures must be implemented to meet the interior noise level standards of no more than 45 dB and there must be no outside noise sensitive uses involved in the project.

Is the project new construction or rehabilitation of a residential structure?

Yes No

Is the project located near any of the following major noise sources?

Civilian or military airports (within 15 miles) Yes No

Major roads with greater than 10,000 Average Daily Trips (ADT) (within 1,000 feet)? Yes No

Railroad (within 3,000 feet)? Yes No

If NO, submit the appropriate source documentation proving this and you are finished with this section.

If YES and the project is new construction, comply with 24 CFR 51, Subpart B. Refer to IHEDA Appendix 3 for making maps. Use adopted DNL contours if the noise source is an airport.

If YES and the project is rehab of an existing structure, you must have noise attenuation measures incorporated into your project design and specs. Explain the noise attenuation measures:

If YES and the project contains balconies, other development standards may apply. Stop and contact IHEDA immediately.

Comments:

Source Documentation: (1) Attach a map showing the project location and the locations of any relevant roads, railroads, or airports, along with their approximate distance from the project site. (2) Attach aerial photos. (3) Attach topographic maps that show elevation contours. (4) If applicable, attach a copy of the applicable HUD Noise Abatement and Control worksheets [here](#) and/or IHEDA Appendix 10 HUD Airport Noise worksheet. (5) If yes to any of the above and you are doing new construction, comply with 24 CFR 51, Subpart B.

2-5. Environmental Protection

2-5-1. Air Quality

Section 176 (c) of the Clean Air Act requires all federal agencies that permit, fund or approve actions to ensure that actions conform with approved state plans for air quality before the action is approved. This is done at the national and state levels.

Does the project include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units? Yes No

If NO, then skip to section 2-5-2. If YES, answer the next question.

Is the project in a nonattainment area? Yes No

If NO, then skip to section 2-5-2. If YES, answer the next two questions. Provide the National Ambient Air Quality Standard designation, classification and nonattainment status not met:

Determine the estimated emissions levels of your project for each of the criteria pollutants that are in the nonattainment status on your project area. Will your project exceed the *de minimis* or threshold emission levels? Yes No

If YES, contact IDEM for comment.

Comments:

Source Documentation: (1) Attach the Indiana Nonattainment Map. (2) If applicable, print off relevant maps or materials and attach. (3) If applicable, attach letter requesting comment from IDEM and IDEM's comment letter.

2-5-2. Contamination and Toxic Substances

All properties assisted with HTF funds must be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of occupants or conflict with the intended use of the property. All proposed multifamily (more than four housing units) HTF projects require a Phase I Environmental Assessment (ESA-ASTM).

Does required Phase I Environmental Assessment for the property include any recognized environmental concerns (RECs)?

Yes No

If YES, a Phase II (ESA-ASTM) will be required. ASTM reports shall be prepared in accordance with the most current ASTM standard.

Is the HTF project site located within .25 miles of a Superfund or CERCLIS (Comprehensive Environmental Response, Compensation, and Liability Information System) site or other contaminated site reported to Federal, State, or local authorities?

Yes No

If YES, please provide a statement in writing from the EPA or the appropriate State agency that there is no hazard that could affect the health and safety of the occupants or conflict with the intended use of the property.

Comments:

Source Documentation: (1) Attach Phase I ESA and if applicable, Phase II ESA. (2) If applicable, provide a map identifying the project location and the location of the potential toxic or radioactive concern and showing the distance between them and an EPA or State Agency letter.

2-5-2. Radon Testing and Mitigation

HUD [CPD Notice 23-103](#) requires the consideration of radon gas in buildings as part of proposed HUD projects subject to HUD contamination regulations. IHCD is requiring radon testing be completed for all rehabilitation and new construction projects at the CEST or Assessed level of review. Testing must be completed by a certified professional/contractor. Depending on whether a project is new construction or rehabilitation, radon testing will occur either before or after the initial Environmental Review process.

Is your application funding the rehabilitation of any existing housing units?

Yes No

If no, testing for radon will be required prior to the final IHCD inspection of new construction buildings. If radon testing shows levels at 4.0 pCi/L or greater in the new building, mitigation will be required in order to pass final inspection.

If yes, please include the radon testing results with the Environmental Review Record.

Do the results show radon levels in the current building(s) at 4.0 pCi/L or higher?

Yes No

If no, no further action is required. If yes, a mitigation plan must be provided along with the Environmental Review record. Mitigation plans must: identify the radon level; consider the risk to occupants' health; describe the radon reduction system that will be installed; whenever possible, establish an ongoing maintenance plan to ensure the system is operating as intended; and establish a reasonable timeframe for implementation.

Rehabilitation projects will be required to provide post-mitigation testing results to IHCD prior to the final inspection.

Comments:

Date of Testing:

Name of contractor/professional who completed testing:

Source documentation: (1)If rehabilitation, attached the radon testing report. (2)If testing levels identify 4.0 pCi/L or higher of radon present in the building, attach a mitigation plan.

2-6. Historic Preservation

2-6-1. Standards

The project activities (including demolition) must not be performed on properties that are either listed in or determined eligible for listing in the National Register of Historic Places, unless the project activities meet the Secretary of the Interior's Standards for Rehabilitation, either as certified through the Federal and/or State historic rehabilitation tax credit programs or as verified by someone that meets the relevant Secretary of the Interior's Professional Qualification Standard.

Is the project listed or eligible for listing in the National Register of Historic Places individually or as part of a historic district?

Yes No

If YES, does the project meet the [Secretary of Interior's Standards for Rehabilitation](#) – including the Standards related to new construction?

Yes No

If YES, provide proof of the project meeting these standards.

If NO, please contact IHEDA.

Comments:

Source Documentation: (1) Copy of aerial map showing the site is not listed on the NRHP individually or in a NRHP district according to [DNR's Indiana Historic Buildings, Bridges, and Cemeteries](#) site. Include SHAARD Reports as needed. (2) If listed, please provide proof of the project meeting the Secretary of Interior's Standards for Rehabilitation and New Construction.

2.6.2. Archaeological Resources

If archaeological resources or human remains are discovered on the project site during construction, the grantee must consult with affected tribes and/or descendant communities and comply with the Native American Graves Protection and Repatriation Act (25 U.S.C. 3001–3013), State law and/or local ordinance (e.g., State unmarked burial law).

Documentation of all consultation correspondence with the affected tribe and/or descendant communities, and how compliance with the Native American Graves Protection and Repatriation Act (25 U.S.C. 3001–3013), State law and/or local ordinance (e.g., State unmarked burial law) must be met for any HTF funded project to remain in compliance.

Comments: