

## Tiered Environmental Review Format

This tiered review format [per 24CFR §58.15] is designed to be used for activities that are categorically excluded [per 24CFR §58.35(a)] subject to the laws and authorities at Part 58.5. Activities in this category include rehabilitation of residential single-family, owner-occupied housing units on scattered sites.

### **Instructions:**

#### **Tier 1 – Complete the Environmental Exemption**

- Signed by RE's Certifying Officer.
- File and send Copy of State.
- Costs can now be obligated or incurred for these non-construction activities.

#### **Tier 2 – Target Area Assessment – Statutory Checklist (More detailed instruction of the process is contained within Chapter 3)**

- Define the proposed project and identify the source of project funds.
- Determine the area of consideration- the geographic portion of a City or County from which applications are to be accepted, or projects will be selected. (Must match the area proposed to be served within the CDBG grant application.)
- Within the area of consideration and based on the specific project, consider the Statutes, Executive Orders, and regulations at 24 CFR Part 58 (the broad based review). Document the Statutory Checklist with the determination that any authorities can be excluded from further site-specific review.
- Maintain documentation in the ERR of the laws and authorities that can be excluded from further site-specific review.
- Identify the process that will be used in the site-specific reviews
- Prepare a tiered review form once for each program, and retain it in the Environmental Review Record (ERR). A new Tier 2 Review must be completed whenever there are changes in the area of consideration or changes in the environmental conditions which could affect the program or which may bear on the program's impact on the environment.
- Upon completion of the form, either: Publish / disseminate the Notice of Intent to Request Release of Funds per §58.70. The NOI / RROF shall identify the significant issues to be addressed in the site-specific reviews. Refer to Exhibit 3N in the 2013 Grant Management Handbook, per §58.15. Do not commit funds to specific projects before obtaining the Release of Funds Form for the program from OBDD-IFA or before completing the site-specific review.

#### **Tier 3 – Site-Specific Assessment**

- Complete the site-specific review of each activity prior to committing funds for each specific property.
- Maintain all supporting documents in the ERR file to evidence compliance.

## Determination of Categorical Exclusion (subject to Section 58.5)

Determination of activities per 24 CFR 58.35(a)

Project Name(s) and Grant

Northwest Oregon Regional Housing Rehabilitation Program

Number(s): Activity / Project

H23007

Description:

1. **The types of rehab activities that are eligible for funding** under the Northwest Oregon Regional Housing Rehabilitation Revolving Loan Program are included in their entirety in the Program Guidelines which were approved by OBDD/IFA on December 19, 2017, specifically work and materials to bring the property into compliance with Section 8 Existing Housing Standards, to correct certain housing conditions endangering the health, safety, or welfare of the occupants, for preservation and restoration of structural integrity, for reasonable accommodation modifications, for improvements to energy efficiency, for repair or restoration of maintenance items or other repairs as deemed necessary and fall under CDBG allowable guidelines.
2. **The approved housing rehabilitation program policies do not allow for “major” rehabilitation**, nor allow for new expansion, non-habitable spaces such as garages, carports or storage sheds unless they affect the structural integrity of the dwelling unit, alteration or expansion of the footprint of a structure located in a federally designated wetland, conversion of land use, acquisition of underdeveloped land, landscaping, or hazardous tree removal.
3. **The cost of repairs** can not exceed 50% of the market value of the structure prior to the home repair work being completed. For the projects that will be stick built homes, the funds will be provided to the homeowners as 0%, 30 year, Deferred Payment Loans (no payments), with \$21,500 being the estimated average loan. The additional projects are covered by the additional \$100,000 Manufactured Homes in Parks tranch of funds, these will be grants, not loans, and averaging around \$17,000 per home.
4. **Number of units to be assisted:** There are an estimated 23 homes which will be assisted with Northwest Oregon Regional Housing Rehabilitation Program Grant #H23007. Of these, 17 will be stick built homes or manufactured homes on private lots, and 6 will be manufactured homes in parks.
5. **Statutory Checklist items identified:** Only minor rehabilitation will be performed in this Housing Rehabilitation Loan Program. No ground disturbance is anticipated; and not allowed in Riparian or Designated Wetland areas. SHPO will be advised on projects where homes might be designated as historic, and THPO for the Confederated Tribes of the Grande Ronde will be advised on all projects. The Site Specific Reviews will be performed on every individual project as they are identified, and will include SHPO/THPO, any local required architectural or preservation input, HUD Environmental Standards of Noise Abatement and Control and Toxic Chemicals and Radioactive Materials; and the Flood Disaster Protection Act. [See Page 2 for additional Project Description]

Estimated activity cost: \$500,000

Funding Source: ☒ CDBG ☐ HOME ☐ Public Housing ☐ EDI ☐ ICDBG  
☐ NAHASDA ☐ Other: \_\_\_\_\_

- ☒ The project falls into the category below, which is listed at 24 CFR 58.35(a) as a Categorically Excluded activity subject to Section 58.5.
- ☐ Acquisition, repair, improvement, reconstruction, or rehabilitation of public facilities and improvements (other than buildings) when the facilities and improvements are already in place and will be retained in the same use without change in size or capacity for more than 20 percent. Examples:
- Replacement of water or sewer lines
  - Reconstruction of curbs and sidewalks
  - Repaving of streets
- ☐ Special projects directed toward the removal of material and architectural barriers that restrict the mobility of and accessibility to the elderly and handicapped persons.
- ☒ Rehabilitation of buildings and improvements under the following conditions:
- In the case of a single-family owner-occupied residence, the density is not increased beyond the single unit, the land use is not changed, and the footprint of the building is not increased in a floodplain or in a wetland.
- ☐ An individual action:
- Up to four dwelling units where there is a maximum of four units on any one site. The units can be four one-unit buildings or one four-unit building or any combination in between; or
  - A project of five or more housing units developed on scattered sites when the sites are more than 2,000 feet apart and there are not more than four housing units on any one site.
- ☐ Acquisition (including leasing) or disposition of an existing structure or acquisition (including leasing) of vacant land provided that the structure or land acquired or disposed of will be retained for the same use.
- ☐ Combinations of the above activities

The determination of the category listed above is supported by the following information (explain how you determined that the project satisfied the condition of the category you checked above and document as appropriate):

**You must complete the compliance checklist for 24 CFR 58.6 and the Statutory Worksheet on the following pages.**

|                                                                  |
|------------------------------------------------------------------|
| Compliance Checklist for the “Other Requirements” in 24 CFR 58.6 |
|------------------------------------------------------------------|

Project Names: Northwest Oregon Regional Housing Rehabilitation Grant Program

Address: Housing Rehabilitation throughout Clatsop, Columbia & Tillamook Counties, Oregon

Activity / Project Description:

The Columbia County CDBG Project H23007 is a Housing Rehabilitation Revolving Loan Program, which serves low- and very-low income persons throughout all jurisdictions and areas of Clatsop, Columbia and Tillamook counties, Oregon. The program offers to homeowners of stickbuilt or manufactured homes on private property 0% Interest, Deferred Payment Loans (loans which bear Zero interest, no payments are made, and become due and payable if the home is sold, refinanced – or other forms of changes to the Deed, if the home no longer becomes the homeowner's primary residence, or 30 years). Loans are awarded to homeowners of single family stick-built and manufactured homes on private land, who qualify under the Northwest Oregon Regional Housing Rehabilitation Revolving Loan Program Guidelines. Eligible participants will receive these 0% Interest Deferred Payment Loans to assist with rehabilitation repairs to their homes. For homeowners of manufactured homes in parks, their projects will be funded through grants, with no payback or lien provisions.

The individual properties have not yet been determined, so specific property addresses are not included with this Environmental Review; individual Site Specific reviews will be completed after projects have been identified. This program will only do repairs which are within the existing footprint of the home. There may, on occasion, be a ramp installed adjacent to the existing home's footprint which will allow safe access and egress for elderly or disabled persons who live in the home.

The Responsible Entity has concluded that this program provides a positive impact to low and moderate income persons. There will be no disparate or disproportionate negative impact to minority or low and moderate income persons. Minority participation is sought out through outreach and marketing developed by the Certified Non-Profit (Community Action Team), as well as through following the Program Guidelines which have been vetted and approved by Oregon Business Development Department/Infrastructure Finance Authority.

1. The types of rehab activities that are eligible for funding under the Northwest Oregon Regional Housing Rehabilitation Revolving Loan Program are included in their entirety in the Program Guidelines which were approved by OBDD/IFA on December 19, 2017, specifically work and materials to bring the property into compliance with Section 8 Existing Housing Standards, to correct certain housing conditions endangering the health, safety, or welfare of the occupants, for preservation and restoration of structural integrity, for reasonable accommodation modifications, for improvements to energy efficiency, for repair or restoration of maintenance items or other repairs as deemed necessary and fall under CDBG allowable guidelines.
2. The approved housing rehabilitation program policies do not allow for “major” rehabilitation, nor allow for new expansion, non-habitable spaces such as garages, carports or storage sheds unless they affect the structural integrity of the dwelling unit, alteration or expansion of the footprint of a structure located in a federally designated wetland, conversion of land use, acquisition of underdeveloped land, landscaping, or hazardous tree removal.
3. For the projects that will be stick built homes or manufactured homes on private property, the funds will be provided to the homeowners as 0%, 30 year, Deferred Payment Loans (no payments), with \$21,500 being the estimated average loan. The additional projects are covered by the additional \$100,000 Manufactured Homes in Parks tranch of funds, these will be grants, not loans, and averaging around \$17,000 per home.
4. There are an estimated 23 homes which will be assisted with CDBG Housing Rehabilitation Grant #H23007.
5. Only minor rehabilitation will be performed in this Housing Rehabilitation Loan Program. No ground disturbance is anticipated; and not allowed in Riparian or Designated Wetland areas. SHPO will be advised on projects where homes might be designated as historic, and THPO for the Confederated Tribes of the Grande Ronde will be advised on all projects. Any local jurisdictional established architectural or preservation entity will also be contacted as required by regulation. The Site Specific Reviews will be performed on every individual project as they are identified, and will include SHPO/THPO, HUD Environmental Standards of Noise Abatement and Control and Toxic Chemicals and Radioactive Materials; and the Flood Disaster Protection Act.

Estimated activity cost: \$500,000

Funding Source: ☒ CDBG ☐ HOME ☐ Public Housing ☐ EDI ☐ ICDBG

☐ NAHASDA ☐ Other: \_\_\_\_\_

| Section 1. Flood Disaster Protection Act                                                                                                                                                                                                        |                                                                                        |                                                         |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|---------------------------------------------------------|
| Are funds for acquisition (including equipment) or construction (including repair and rehabilitation) purposes?                                                                                                                                 | <input checked="" type="checkbox"/> <b>Yes</b><br>Continue                             | No<br>Proceed to Section 2-Act does not apply           |
| Is the Activity in an area identified as having special flood hazards (SFHA)?<br><br>Identify FEMA flood map used to make this determination:                                                                                                   | <b>TO BE DETERMINED ON SITE SPECIFIC BASIS</b>                                         | <b>TO BE DETERMINED ON SITE SPECIFIC BASIS</b>          |
| Community Name and Number                                                                                                                                                                                                                       |                                                                                        |                                                         |
| Map panel number and date                                                                                                                                                                                                                       |                                                                                        |                                                         |
| <b>This section will be documented on a case-by-case basis with an individual determination.</b>                                                                                                                                                |                                                                                        |                                                         |
| Is the Community participating in the National Insurance Program (or has less than one year passed since FEMA notification of Special Flood Hazards)?                                                                                           | <input checked="" type="checkbox"/> <b>Yes</b> Document and follow instructions below. | No-Federal Assistance may not be used for this project. |
| Flood Insurance under the National Flood Insurance Program must be obtained and maintained for the economic life of the project in the amount of the total project cost. A copy of the flood insurance policy declaration must be kept on file. |                                                                                        |                                                         |

| Section 2. Airport Runway Clear Zones (Civil) and Accident Potential Zones (Military)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                 |                                                                                                     |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|-----------------------------------------------------------------------------------------------------|
| Does the project involve HUD assistance, subsidy or insurance for the purchase or sale of an existing property?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Yes<br>Continue | <input checked="" type="checkbox"/> No Proceed to Section 3-regulation does not apply.              |
| Is the project located within 2,500 feet of a civil airport or 15,000 feet of a military airfield?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Yes<br>Continue | <input checked="" type="checkbox"/> No Document and proceed to Section 3-regulation does not apply. |
| Is the project located within an FAA-designated civilian airport Runway Clear Zone (RCA) or Runway Protection Zone, or within the military Airfield Clear Zone (CZ) or Accident Potential Zone / Approach Protection Zone (APZ), based upon information from the airport or military airfield administrator identifying the boundaries of such zones?                                                                                                                                                                                                                                                                                                                                            | Yes<br>Continue | <input checked="" type="checkbox"/> No Document and proceed to Section 3-regulation does not apply. |
| <p>Comply with 24 CFR Part 51, Subpart D. This may include providing a written notice to a prospective buyer or leaser of the potential hazards from airplane accidents and the potential that an airfield operator may wish to purchase the property. Maintain copies of the signed notice. For properties located in a military clear zone, make and document a determination of whether the use of the property is consistent with DOD guidelines. Notice Sample:</p> <p><a href="http://www.hudexchange.info/resource/2758/notice-prospective-buyers-properties-in-runway-clear-zones">www.hudexchange.info/resource/2758/notice-prospective-buyers-properties-in-runway-clear-zones</a></p> |                 |                                                                                                     |

### Section 3. Coastal Barrier Resources Act

Section 58.6 also requires compliance with the Coastal Barrier Resources Act. There are no Coastal Barrier Resource Areas in Oregon. Therefore, the Act does not apply.

**TIER 1 – OVERALL PROGRAM REVIEW**  
Target Area Assessment

**Program name and description:**

**Northwest Oregon Regional Housing Rehabilitation Revolving Loan Program,  
(covering Clatsop, Columbia and Tillamook County, Oregon) Housing  
Rehabilitation Program**

**Activity / Project Description:**

1. The types of rehab activities that are eligible for funding under the Northwest Oregon Regional Housing Rehabilitation Revolving Loan Program are included in their entirety in the Program Guidelines which were approved by OBDD/IFA on December 19, 2017, specifically work and materials to bring the property into compliance with Section 8 Existing Housing Standards, to correct certain housing conditions endangering the health, safety, or welfare of the occupants, for preservation and restoration of structural integrity, for reasonable accommodation modifications, for improvements to energy efficiency, for repair or restoration of maintenance items or other repairs as deemed necessary and fall under CDBG allowable guidelines.
2. The approved housing rehabilitation program policies do not allow for “major” rehabilitation, nor allow for new expansion, non-habitable spaces such as garages, carports or storage sheds unless they affect the structural integrity of the dwelling unit, alteration or expansion of the footprint of a structure located in a federally designated wetland, conversion of land use, acquisition of underdeveloped land, landscaping, or hazardous tree removal.
3. For the projects that will be stick built homes or manufactured homes on private property, the funds will be provided to the homeowners as 0%, 30 year, Deferred Payment Loans (no payments), with \$21,500 being the estimated average loan. The additional projects are covered by the additional \$100,000 Manufactured Homes in Parks tranch of funds, these will be grants, not loans, and averaging around \$17,000 per home.
4. There are an estimated 23 homes which will be assisted with CDBG Housing Rehabilitation Grant #H23007.
5. Only minor rehabilitation will be performed in this Housing Rehabilitation Loan Program. No ground disturbance is anticipated; and not allowed in Riparian or Designated Wetland areas. SHPO will be advised on projects where homes might be designated as historic, and THPO for the Confederated Tribes of the Grande Ronde will be advised on all projects. Any local jurisdictional established architectural or preservation entity will also be contacted as required by regulation. The Site Specific Reviews will be performed on every individual project as they are identified, and will include SHPO/THPO, HUD Environmental Standards of Noise Abatement and Control and Toxic Chemicals and Radioactive Materials; and the Flood Disaster Protection Act.

**Definition of Area of Consideration** (the geographic area where loans or grants applications will be accepted or funds will be allocated for this program): Attach a composite map showing area of consideration and floodplains.

Applications will be accepted within all of the Cities, Jurisdictions, Incorporated and Unincorporated areas throughout the Counties of Columbia, Clatsop and Tillamook’s boundaries (see attached map).



# STATUTORY WORKSHEET

Use this worksheet only as part of a Tiered Review

Compliance documentation must contain verifiable source documents and relevant base data.

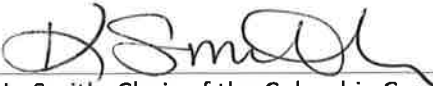
| HUD Environmental Standards                                        | Status A/B                                                                                     | Determination and Compliance Documentation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|--------------------------------------------------------------------|------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Historic Preservation</b><br>[36 CFR Part 800]                  | <input type="checkbox"/> B <input checked="" type="checkbox"/> B                               | <p>If the housing rehabilitation program allows the alteration, repair or rehabilitation of historic properties, this review must be completed on the site-specific (Tier 2) review, on a case-by-case basis, and a “B” designation will be noted.</p> <p>The ER must also include the required THPO contact documentation. Refer to page 3-25 and 3-31 to 3-34 of the 2024 GMH.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Floodplain Management</b><br>[24 CFR 55, Executive Order 11988] | <input type="checkbox"/> A <input checked="" type="checkbox"/> A<br><input type="checkbox"/> B | <p>If the housing 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 in compliance with Executive Order 11988.</p> <p>If the housing 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 with the ER. Refer to pages 3-34 to 3-35 and Exhibit 3 “O” of the 2024 GMH.</p> <p>Under either circumstance above, an “A” designation can be achieved and the relevant information must be included in the “project description” or attached to the ERR.</p> |
| <b>Wetland Protection</b><br>[Executive Order 11990]               | <input type="checkbox"/> A <input checked="" type="checkbox"/> A<br><input type="checkbox"/> B | <p>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 the wetland the recipient may not need to complete all 8-steps of the process. This must be documented in the ER.</p> <p>An “A” designation can be achieved and the relevant information must be included in the “project description” or attached to the ERR.</p>                                                                                                                                                                                                                                                                                                                                                              |
| <b>Coastal Zone Management Act</b><br>[Sections 307(c), (d)]       | <input type="checkbox"/> A <input checked="" type="checkbox"/> A<br><input type="checkbox"/> B | <p>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.</p> <p>An “A” designation can be achieved and the relevant information must be included in the “project description” or attached to the ERR.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

| HUD Environmental Standards                   | Status A/B                                                                                                                                                              | Determination and Compliance Documentation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|-----------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Sole Source Aquifers</b><br>[40 CFR 149]   | <div data-bbox="459 583 505 636"><input checked="" type="checkbox"/> A</div> <b>A</b><br><div data-bbox="459 659 505 711"><input type="checkbox"/> B</div> <b>B</b>     | <p>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. Under this circumstance, an “A” designation can be achieved.</p> <p>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. Under this circumstance, an “A” designation can be achieved.</p> <p>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 an “A” designation can be achieved.</p> <p>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, a the Responsible Entity cannot make a determination that the project will have no affect on the Sole-Source Aquifer quality a “B” designation must be noted and compliance with this requirement must be completed on the site-specific (Tier 2) review, on a case-by-case basis.</p> <p>All the relevant information must be included in the “project description” or attached to the ERR.</p> |
| <b>Endangered Species Act</b><br>[50 CFR 402] | <div data-bbox="459 1381 505 1434"><input checked="" type="checkbox"/> A</div> <b>A</b><br><div data-bbox="459 1457 505 1509"><input type="checkbox"/> B</div> <b>B</b> | <p>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 et cetera, is located in a defined riparian zone.</p> <p>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 <u>none</u> of the assisted properties will be located in a riparian zone, compliance with the requirement can be achieved and an “A” designation can be obtained and consultation with the USFWS and/or NOAA Fisheries will not be required. Attach the “No Effect” checklist to the ERR.</p> <p>If the housing rehabilitation program cannot meet the above criteria compliance with this requirement must be based on the site-specific (Tier 2) review, on a case-by-case basis. Under these circumstances a “B” designation must be made.</p> <p>All the relevant information must be included in the “project description” or attached to the ERR.</p>         |

| HUD Environmental Standards                                          | Status A/B                                                                   | Determination and Compliance Documentation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|----------------------------------------------------------------------|------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Wild and Scenic Rivers Act</b><br>[Sections 7(b), and (c)]        | <input checked="" type="checkbox"/> A <b>A</b><br><input type="checkbox"/> B | <p>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.</p> <p>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. An “A” designation can be achieved.</p>                                                                                                                                                                                                                                                                                        |
| <b>Clean Air Act</b><br>[Sections 176(c), (d), and 40 CFR 6, 51, 93] | <input checked="" type="checkbox"/> A <b>A</b><br><input type="checkbox"/> B | <p>Check the current DEQ listed non-attainment areas. If the funded housing rehabilitation program service area includes any of these areas, this review and determination must be made for the program as a whole. An “A” designation should be able to be achieved.</p> <p>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, and an “A” designation can be achieved.</p> <p>Attach the written documentation to support the conclusion to ER.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Farmland Protection Policy Act</b><br>[7 CFR 658]                 | <input checked="" type="checkbox"/> A <b>A</b><br><input type="checkbox"/> B | <p>If the housing rehabilitation program does not convert farmland to nonagricultural purposes the program can be found to be in compliance with the Farmland Protection Act, and an “A” designation should be able to be achieved. Include information regarding compliance in either the “Project Description” or attach it to the ERR.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Environmental Justice</b><br>[Executive Order 12898]              | <input checked="" type="checkbox"/> A <b>A</b><br><input type="checkbox"/> B | <p>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.</p> <p>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 Responsible Entity 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 an “A” designation can be achieved.</p> |

| HUD Environmental Standards                                             | Status A/B                                                                                     | Determination and Compliance Documentation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|-------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Noise Abatement and Control</b><br>[24 CFR 51B]                      | <input type="checkbox"/> B <input checked="" type="checkbox"/> B                               | <p>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 et cetera) this review must be completed.</p> <p>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 on the site-specific (Tier 2) review, on a case-by-case basis and a “B” designation will be noted.</p> |
| <b>Explosive and Flammable Operations</b><br>[24 CFR 51C]               | <input type="checkbox"/> A <input checked="" type="checkbox"/> A<br><input type="checkbox"/> B | <p>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 and an “A” designation can be achieved.</p> <p>Provide information to support this conclusion with the “Project Description”.</p>                                            |
| <b>Toxic Chemicals and Radioactive Materials</b><br>[HUD Notice 79-33]  | <input type="checkbox"/> B <input checked="" type="checkbox"/> B                               | <p>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 et cetera) contamination, toxic chemicals and gasses (residential propane tanks) and radioactive substances or will is located near (EPA superfund site, landfill, brownfield, underground storage tank clean-up et cetera) this review must be completed on the site-specific (Tier 2) review, on a case-by-case basis, and a “B” designation must be noted.</p>                                                                                                   |
| <b>Airport Clear Zones and Accident Potential Zones</b><br>[24 CFR 51D] | <input type="checkbox"/> A <input checked="" type="checkbox"/> A<br><input type="checkbox"/> B | <p>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 review, and an “A” designation can be achieved.</p> <p>However, 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 <u>and</u> the HR program allows major rehabilitation, this review must be completed on the site-specific (Tier 2) review, on a case-by-case basis, and a “B” designation must be noted.</p>    |
| <b>Flood Disaster Protection Act</b>                                    | <input type="checkbox"/> B <input checked="" type="checkbox"/> B                               | <p>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 Responsible Entity will ensure that the homeowner has proof of flood insurance before improvements are made to the housing unit. This determination must occur on a case-by-case basis in the Tier 2 site-specific review. A “B” designation must be noted.</p>                                                                                                                                                                                                                               |

| HUD Environmental Standards          | Status A/B                                                       | Determination and Compliance Documentation                                                                                    |
|--------------------------------------|------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|
| <b>Coastal Barrier Resources Act</b> | <input checked="" type="checkbox"/> A <input type="checkbox"/> B | There are no Coastal Barrier Resource Areas in Oregon. Therefore, the Act does not apply and an “A” designation can be noted. |

|                                                          |                                                                                    |
|----------------------------------------------------------|------------------------------------------------------------------------------------|
| <b>Responsible Entity's Certifying Officer Signature</b> |  |
| <b>Certifying Officer Name and Title</b>                 | Kellie Jo Smith, Chair of the Columbia County Board of Commissioners               |
| <b>Date</b>                                              | June 12, 2025                                                                      |

To be used for each individual project for H23007; attached for reference only

## TIER 2 – SITE-SPECIFIC REVIEW PROCESS AND FORM

### Policies and Procedures for Site-Specific Environmental Reviews

**Columbia County** has made the following decisions pertaining to future site- specific environmental review projects:

**NOTE: If the Tier 1 checklist identifies an “A” designation for any environmental standard (specialized topic area) and those standards are identified below, those standards can be deleted. If the Tier 1, checklist identifies a “B” designation for any environmental standard (specialized topic area), that environmental standard must be included in the review procedures / policy for the site-specific Tier 2 reviews, below:**

#### HISTORIC PROPERTIES

**Projects will be evaluated on a case-by-case basis.** For all projects older than 49 years, the City / County will consult with SHPO to determine if the unit is national register eligible or on the national register. **Columbia County** will consider SHPO comments and comply with part 36 CFR Part 800 prior to approving any loan or grant under this program.

#### NOISE

**Projects will be evaluated on a case-by-case basis.** Projects located within 1,000 feet of a major highway or roadway, 3,000 feet of a railroad, 5 miles of a civilian airport, or 15 miles of a military airfield, or in proximity to other significant noise sources (such as manufacturing facilities) are in noise exposed areas and will require further review. For these projects, noise attenuation measures will be included, to the extent feasible, as part of the rehab.

#### TOXIC CHEMICALS AND RADIOACTIVE MATERIALS

**Projects will be evaluated on a case-by-case basis.** If it is determined there are hazards that could affect the health and safety of occupants, **Columbia County** has determined that mitigation of the affected adverse environmental conditions by removing, stabilizing or encapsulating the toxic substances in accordance with the requirements of the appropriate federal, state or local oversight agency will occur, or the project will not be funded.

#### FLOOD DISASTER PROTECTION ACT

**Projects will be evaluated on a case-by-case basis.** It must be determined whether a project 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. The **County** will not provide substantial improvement to homes located in the 100 year flood zone.

Project cannot proceed prior to **Columbia County's** notification that environmental review is complete (ROF issued by OBBD-IFA and the site-specific review has been signed by the Responsible Entity's Certifying Officer).

Building Address: \_\_\_\_\_

Market Value of House: \_\_\_\_\_

Estimated Cost of Rehabilitation: \_\_\_\_\_

Rehabilitation will expand footprint of house: ☐ Yes ☐ No

# HISTORIC PRESERVATION

1. The unit is less than 49 years old and does not include ground disturbance

☐ Yes: STOP here. The Section 106 Historic Preservation review is complete.

☐ Provide documentation to show the age of the building and confirmation that there is no ground disturbance. City determines no historic properties affected.

☐ No: PROCEED to #2

2. Consult the State Historic Preservation Officer (SHPO) to determine if project is on or eligible for the National Historic Register. Notify City of ground disturbance and City will contact Tribes. Check determination:

☐ No Historic Properties Affected

☐ Provide letter documenting concurrence of determination from SHPO

☐ Provide documentation indicating Tribe was contacted and response or documentation showing that there is no ground disturbance

☐ No Historic Properties Adversely Affected

☐ Provide letter documenting concurrence of determination from SHPO

☐ Provide conditions that will be placed on project

Condition(s):

☐ Adverse Effect on Historic Properties (City will make determination with SHPO)

☐ Provide letter documenting concurrence of determination from SHPO

☐ Provide Memorandum of Agreement

Condition(s):



**NOISE:**

1. Is the project located within 1,000 feet of a busy road or highway, 3,000 feet of a railroad, or 15 miles of a civil airport or military airfield? Are there any other potential noise sources in the project vicinity that could produce a noise level above HUD's acceptable range, including but not limited to concert halls, night clubs, event facilities, et cetera?

☐ No: STOP here. Maintain a map identifying distances from roads, railroads and airports and your project. Record your determination. You do not need to calculate a specific noise level.

☐ Yes: PROCEED to #2

2. Determine the actions to take based on the project and HUD Acceptability Standards. For Modernization projects a noise calculation is not required. HUD or RE determines need based on their evaluation of project. Proceed to #3 below.

| HUD General Acceptability Standards |                                                |
|-------------------------------------|------------------------------------------------|
| HUD determination                   | Day night average sound level in decibels (dB) |
| Acceptable                          | Not exceeding 65 dB                            |
| Normally Unacceptable               | Above 65 dB but not exceeding 75dB             |
| Unacceptable                        | Above 75 dB +                                  |

3. Is the Day-Night average sound level above an acceptable level (based on noise calculation or your analysis of the site using maps or a site visit)?

☐ Yes. Encourage noise attenuation features in alterations. Record your determination in the ERR. Identify how you are encouraging noise attenuation

☐ No. Record your determination in the ERR

**TOXIC / HAZARDOUS / RADIOACTIVE MATERIALS, CONTAMINATION, CHEMICALS OR GASES (24 CFR 58.5(l)(2):**

1. Is the property free of hazardous materials, contamination, toxic chemicals and gasses, and radioactive substances, where a hazard could affect the health and safety of occupants? (Special consideration should be given to properties that are located near toxic or solid waste landfill sites, underground storage tanks, or other areas known to contain toxic, hazardous, or radioactive substances.)

☐ Yes. Stop here.

☐ Provide documentation to evidence determination including inspection reports, pictures, and information from [www.epa.gov](http://www.epa.gov) or similar sites.

☐ No. However the project will be conditioned on measures to mitigate the adverse environmental condition (e.g. shielding, removing or encapsulating the toxic substances) according to the requirements of the appropriate Federal, state or local oversight agency.

☐ Provide documentation to show mitigation will address adverse environmental condition.

☐ Provide condition(s) that will be placed on project:

Condition(s):

☐ No. Project cannot be mitigated. PROJECT MUST BE REJECTED.



**FLOOD INSURANCE**

Is the project located in a FEMA designated floodway? (Repairs can be funded in floodplains, just not in floodways.) You can obtain FEMA FIRM (Flood Insurance Rate Maps) at [www.fema.gov](http://www.fema.gov)

☐ Yes. Stop here. Federal financial assistance cannot be used in a floodway. Project activity is not eligible.

☐ No. Provide FIRM map and FIRM map panel number: \_\_\_\_\_

Continue

Is the project located in a FEMA designated 100 year floodplain? Visit this site for FIRM Maps: [www.fema.gov](http://www.fema.gov)

☐ Yes. Project will have to maintain flood insurance on the property

☐ Provide FIRM map and FIRM map panel number: \_\_\_\_\_

☐ Attach copy of flood insurance declaration or condition project

Determination:

☐ This project does not require any mitigation for compliance with any statutes or authorities. This project may now be initiated; OR

☐ Approval of this project is conditioned on the following mitigation measures: These conditions must be included in project contracts or other legally binding documents. The project may be initiated subject to compliance with the conditions:

Conditions:

☐ The project does not comply with the following policy and will not be funded:

|                                                              |                                                                                      |
|--------------------------------------------------------------|--------------------------------------------------------------------------------------|
| <b>Responsible Entity's<br/>Certifying Officer Signature</b> |  |
| <b>Certifying Officer Name<br/>and Title</b>                 |                                                                                      |
| <b>Date</b>                                                  |                                                                                      |