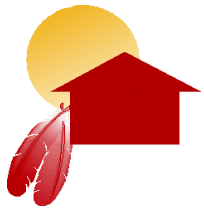


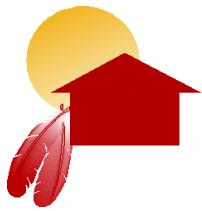
2022

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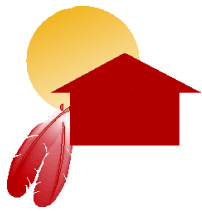
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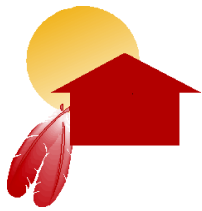
XII. Summary29



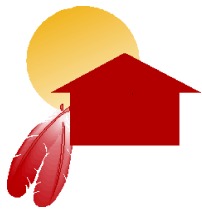
RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
I. Purpose				-
<p>An environmental review is the process of reviewing a project and its potential environmental impacts to determine whether it meets federal, state, and local environmental standards. The environmental review process is required for all HUD-assisted projects to ensure that the proposed project does not negatively impact the surrounding environment and that the property site itself will not have an adverse environmental or health effect on end users. Not every project is subject to a full environmental review (i.e., every project's environmental impact must be examined, but the extent of this examination varies), but every project must be in compliance with the <u>National Environmental Policy Act (NEPA)</u>, and other related Federal and state environmental laws.</p> <p>The purpose of the environmental review is to determine the recipient's compliance with HUD's environmental review and clearance requirements, as outlined in 24 CFR Part 50 and Part 58. Under the Indian Community Development Block Grant (ICDBG) program, the Tribe <u>must</u> assume the responsibilities for completing environmental reviews, unless a claim of legal incapacity is made and sustained by HUD. However, under</p>	24 CFR Parts 50 and 58	https://www.hudexchange.info/programs/environmental-review/ 2012 HUD Environmental Review Compliance Guidebook (Part 58)		Read & Noted



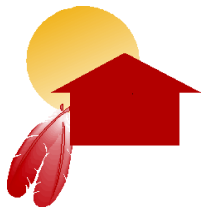
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NAHASDA [Indian Housing Block Grant (IHBG), Title VI, and Section 184 programs], the Tribe may decline the responsibility for carrying out the environmental review responsibilities under 24 CFR Part 58. If a Tribe declines the responsibility, the environmental review responsibilities are carried out by HUD under 24 CFR Part 50.				Read & Noted
Funds cannot be committed or used to undertake a program or activity listed in 24 CFR 58.1(b) if the activity or project would have an adverse environmental impact or limit the choice of reasonable alternatives.	24 CFR 58.22 24 CFR 50.3(h)(3) 24 CFR 1000.20(b)(3) 24 CFR 1003.605			Read & Noted
NOTE: A Phase I environmental site assessment does not satisfy the requirements of an Environment review under 24 CFR Part 58.				Read & Noted
II. Pre-Visit Preparation				-
A. If available, review the following documents: 1. Most recent IHP, approved IHP amendments, IHP amendments in process 2. Previous environmental monitoring findings and corrective action status for findings 3. Previous self-monitoring report(s)				Read & Noted



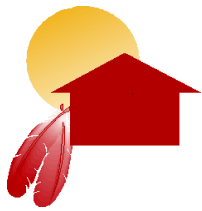
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4. Previous 2 CFR Part 200 and OIG 5. audits, workpapers, and management plan status for findings 6. Previous and current enforcement actions 7. Valid complaints 8. Relevant correspondence				Read & Noted
B. Review the applicable regulations and develop the scope of work based on the following:				Read & Noted
1. Review Indian Housing Plans (IHP) (and amended IHPs) submitted by the recipient to determine whether (and for which projects):				Read & Noted
a. the Tribe assumed responsibility for the environmental reviews under 24 CFR Part 58, or				Tribe has assumed full ER responsibility for all programs
b. the reviews were to be done by HUD under 24 CFR Part 50.				N/A in 2022
2. Utilize Table II of the APR to develop a monitoring strategy.				Read & Noted. Unable to identify this source in our APR, or in the guidance for the APR from 2015 as published last.
3. Show actual or planned start dates for each project or activity.				*All program under IHP: 1/1/22 *34th St Development: 3/8/17



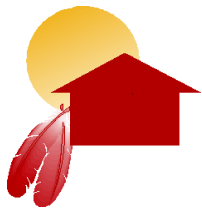
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II. On-Site Review				
Without exception, all Environmental Review Records must include a determination that an action did or did not trigger the requirements of the Flood Disaster Protection Act , the Coastal Barriers Resources Act and include a disclosure of properties located in airport runway clear zones .	24 CFR 58.6(a) 24 CFR 58.6(c) 24 CFR 58.6(d)			Read & Noted; All ERs from 2022 included such determinations – they are incorporated into our ER template.
Sovereignty does not negate the requirement of contacting state agencies.	24 CFR 58.14 & 58.2(a)(7)(ii)			Read & Noted
III. Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities				-
Note: If the Tribe has not assumed environmental review responsibilities, go to Section XI, HUD Environmental Reviews and Clearance.				Read & Noted
If there is an environmental violation, it is a finding , and appropriate corrective actions will need to be taken to address the finding.				Read & Noted
Obtain the environmental review record (ERR) for each covered activity in the sample. Conduct the review in accordance with the following sections as appropriate for the type of project activity.				Read & Noted



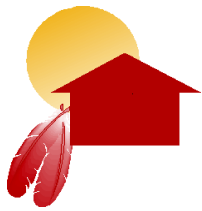
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If deficiencies are noted in the ERRs sampled, the environmental review should be expanded to evaluate environmental records completed by the recipient since the last on-site review.				Read & Noted
IV. Flood Insurance Requirements				-
A. Federal funds may not be used for acquisition and construction (including rehab), even if the activity is exempt or categorically excluded, in an area identified by the Federal Emergency Management Agency (FEMA) as having special flood hazards, unless:	24 CFR 58.6(a)(1)			N/A in 2022 – No properties acquired, rehabilitated, or constructed within a flood plain requiring flood insurance in 2022.
1. The community is participating in the National Flood Insurance Program (NFIP), and	24 CFR 58.6(a)(1)(i) and (ii)			N/A in 2022
2. the recipient purchases and maintains flood insurance under that program.				N/A in 2022
B. Review the FEMA Flood hazard Boundary Map or Flood Insurance Rate Map for the community to determine whether project site is located in a special flood hazard area.				N/A in 2022
C. If so, review the recipient's files to determine if the recipient has purchased and is maintaining flood insurance through the NFIP.				N/A in 2022



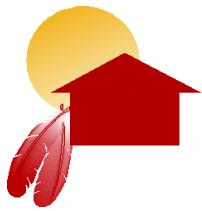
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V. Exempt Activities				-
A. Typical exempt activities include:				-
1. Environmental and other studies	24 CFR 58.34(a)(1)			Completed (Environmental & other studies)
2. Development of plans and strategies	24 CFR 58.34(a)(1)			Completed (Plans & Strategies)
3. Information and financial services	24 CFR 58.34(a)(2)			Completed (Plans & Strategies)
4. Administration and management activities	24 CFR 58.34(a)(3)			Completed (Admin & Mgmt)
5. Public services not having a physical impact or resulting in physical changes (i.e., employment, crime prevention, education, counseling, etc.)	24 CFR 58.34(a)(4)			Completed (Supportive Services - Other Housing Services)
6. Inspections and testing for hazards or defects	24 CFR 58.34(a)(5)			Completed (Inspections)
7. The purchase of insurance	24 CFR 58.34(a)(6)			N/A in 2021
8. The purchase of tools	24 CFR 58.34(a)(7)			Completed (Tools)
9. Engineering or design costs	24 CFR 58.34(a)(8)			Completed (Construction of Rental Housing).
10. Technical assistance and training	24 CFR 58.34(a)(9)			Completed (Technical assistance & training)



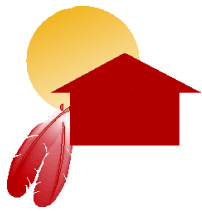
RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
11. Emergency repairs	24 CFR 58.34(a)(10)			N/A in 2022
a. Emergency repairs are limited.				N/A in 2022
b. There is no “ Emergency Rehabilitation. ”				N/A in 2022
12. Payment of principal and interest	24 CFR 58.34(a)(11)			N/A in 2022
B. Determine if the activities listed in the ERR are included in the list of exempt activities.	24 CFR 58.34			Yes, all are exempt activities or convert to exempt activities
C. Determine if the responsible entity (the Tribe) reviewed compliance with the other applicable regulatory requirements.	24 CFR 58.6			Yes, we completed & documented any support needed for the determinations
1. If there is not adequate documentation for this review:				N/A – adequate documentation
a. Get a copy of the HUD format for projects that are Exempt per § 58.34 or Categorically Excluded, Not Subject To (CENST) per § 58.35(b). The format should be supplemented by the HUD worksheets and supporting documentation for each applicable law and authority.	24 CFR 58.34	HUD CENST / Exempt format HUD worksheets		N/A – adequate documentation



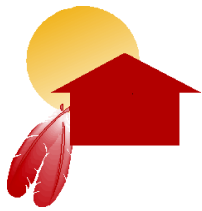
RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
b. Complete the CENST package, and include it in its records for each activity or activities in this category.				N/A – adequate documentation
D. Determine if the recipient adequately documented the determination of exemption for each activity.				Yes, we adequately documented the determinations
1. If the recipient does not have adequate documentation for each activity:				N/A – adequate documentation – we already completed as part of the determination for all activities, the checklist is integrated into our declaration form
a. Get a copy of the Sample Statutory Checklist for Projects that are Exempt Per § 58.34, and	24 CFR 58.34	(see link under VI.C.1.a., above)		N/A – adequate documentation
b. Complete the Checklist and include it in its records for each activity in this category.				N/A – adequate documentation
E. Include in the work papers a copy of one correctly completed record and/or documents to support each error disclosed. The errors documented will be the basis for the environment finding.				Read and Noted
F. Based on the number of errors disclosed, determine if expanding the sample size is appropriate.				N/A – no errors found



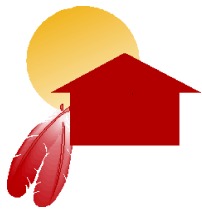
RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
G. Obtain copies of the corrected records before completing the review. Lack of documentation on exempt activities does not become a finding unless technical assistance has previously been provided and the recipient's records are still inadequate.				N/A
VI. Categorical Exclusions, Not Subject to 24 CFR § 58.5				-
A. Typical categorically-excluded activities, which are not subject to §58.5, include:				Read & Noted
1. Tenant-based rental assistance;	24 CFR 58.35(b)(1)			Completed (Tenant-based rental assistance)
2. Supportive services (i.e., health care, housing services, etc.)	24 CFR 58.35(b)(2)			Completed (Other Housing Services - Supportive services)
3. Operating costs (i.e., maintenance, security, utilities, etc.)	24 CFR 58.35(b)(3)			Completed (Operating Costs)
4. Economic development activities (i.e., equipment purchase, operating expenses not associated with construction or expansion, etc.)	24 CFR 58.35(b)(4)			N/A in 2022
5. Down payment or close cost assistance to homebuyers for existing units.	24 CFR 58.35(b)(5)			N/A in 2022



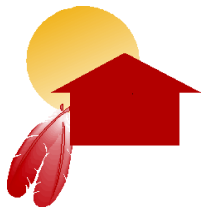
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B. Determine if the activities listed in the ERR are included in the list of categorical exclusions, not subject to 24 CFR § 58.5.	24 CFR 58.35(b)			Yes, they are correctly attributed
C. Determine if the responsible entity (the Tribe) reviewed compliance with regulatory requirements of 24 CFR § 58.6.				Yes, the determinations includes the requisite requirements
1. If there is not adequate documentation for this review:				Adequate documentation included
a. Get a copy of the HUD format for projects that are Categorical Excluded, Subject To (CEST) per 58.35(a). The format should be supplemented by the HUD worksheets and supporting documentation for each applicable law and authority.	24 CFR 58.35(b)	HUD CEST format HUD worksheets		N/A - Adequate documentation included
b. Complete the CEST package and include it in its records for each activity in this category.				N/A - Adequate documentation included
D. Determine if the recipient adequately documented its determination of categorical exclusion, not subject to 24 CFR § 58.5, for each activity.				Determination included and adequate documentation included



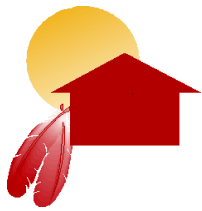
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1. If the recipient does not have adequate documentation for each activity:				N/A - Adequate documentation included
a. Get a copy of the Sample Statutory Checklist for Categorical Exclusions Not Subject to § 58.5, and	24 CFR 58.35(b)	(See link under VII.C.1.a., above)		N/A - Adequate documentation included
b. Complete the Checklist, and include it in its records for each activity in this category.				N/A - Adequate documentation included
E. Include in the workpapers a copy of one correctly completed record and the documents to support each error disclosed. The errors documented will be the basis for the environmental finding.				Read & Noted
F. Based on the number of errors, determine if expanding the sample size is appropriate.				N/A – no errors found
G. Obtain copies of the corrected records before completing the review.				N/A – no corrected records to review
I. Lack of documentation on categorically-excluded activities, not subject to 24 CFR § 58.5, does not become a finding unless:				Read & Noted
1. technical assistance has previously been provided, and				Read & Noted



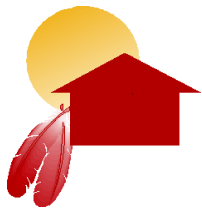
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2. the recipient's records are still inadequate, or				Read & Noted
3. the recipient fails to complete the ERR prior to the issuance of the final monitoring report.				Read & Noted
VIII. Categorical Exclusions, Subject to 24 CFR § 58.5				-
A. Typical categorically-excluded activities, which are subject to §58.5, include:				Read & Noted
1. Acquisition, repair, improvement, reconstruction, rehabilitation of public facilities (other than building) when the facilities:	24 CFR 58.35(a)(1)			N/A in 2022
a. are in place and				N/A in 2022
b. will be retained in the same use without change in size or capacity.				N/A in 2022
2. Removal or material and architectural barriers	24 CFR 58.35(a)(2)			N/A in 2022
3. Rehabilitation of buildings and improvements	24 CFR 58.35(a)(3)			N/A in 2022



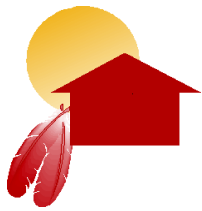
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4. An individual action (e.g., disposition, new construction, demolition, acquisition) on up to four dwelling units; or	24 CFR 58.35(a)(4)(i)			N/A in 2022
5. An individual action on five or more units scattered on sites more than 2,000 feet apart and no more than 4 units per site.	24 CFR 58.35(a)(4)(ii)			N/A in 2022
B. Determine if the activities listed in the ERR are included in the list of categorical exclusions, subject to 24 CFR § 58.5.	24 CFR 58.35(a)			N/A in 2022
C. Determine if the responsible entity (the Tribe) reviewed compliance with applicable regulatory requirements.	24 CFR 58.6			N/A in 2022
1. If there is not adequate documentation of this review in the recipient's files:				N/A in 2022
b. Get a copy of the HUD format for projects that are Categorical Excluded, Subject To (CEST) per 58.35(a). The format should be supplemented by the HUD worksheets and supporting documentation for each applicable law and authority.		HUD CEST format HUD worksheets		N/A in 2022



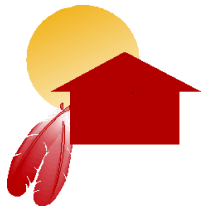
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a. Complete the CEST package and include it in its records for each activity in this category.				N/A in 2022
D. Review each ERR to establish if compliance with the applicable laws and authorities was determined and documented; i.e., if there is a completed statutory worksheet.	24 CFR 58.5			N/A in 2022
E. Determine if recognized authoritative sources were used to support the conclusions reached.				N/A in 2022
1. If the recipient does not have adequate documentation for each activity:				N/A in 2022
a. Get a copy of the Sample Statutory Checklist and		(see link under VIII.C.1.a., above)		N/A in 2022
b. Complete the Checklist and include it in its records for each activity in this category.				N/A in 2022
F. If it was determined and documented that there were no circumstances which required compliance with any of the applicable federal laws or authorities, the project converts to exempt under the provisions of 24 CFR § 58.34(a)(12).	24 CFR 58.5			N/A in 2022



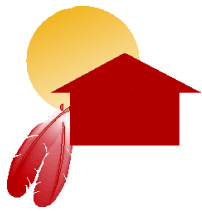
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1. No Request for Release of Funds (RROF), HUD-7015.15, is required.				N/A in 2022
2. The activity may begin, i.e., funds may be obligated/expended on the activity once this determination had been made.				N/A in 2022
3. If applicable, was such a determination documented?				N/A in 2022
G. If compliance was required with any of the applicable federal laws or authorities were those actions needed to obtain compliance completed, e.g., the 8-step process required by E.O. 11988 Floodplain Management?	24 CFR 58.5			N/A in 2022
H. Subsequent to obtaining compliance, were the RROF responsibilities, including public comment, met?	24 CFR 58.45			N/A in 2022
1. Obtain a copy of the actual notice and affidavit of publication or evidence of posting.				N/A in 2022
a. Was the HUD recommended format or an equivalent used for the publication or posting?				N/A in 2022
b. Was the required public comment period complied with?				N/A in 2022



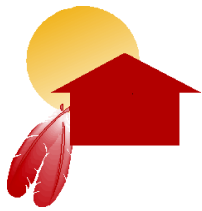
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2. Obtain a copy of the RROF.				N/A in 2022
a. If the certifying officer is someone other than the CEO of the Tribe:				N/A in 2022
(1) ensure the certifying officer is properly designated, and				N/A in 2022
(2) ensure the information is adequate and accurate.				N/A in 2022
3. Obtain a copy of Form HUD-7015.16, Authority to Use Grant Funds, and determine whether it was executed by HUD.				N/A in 2022
4. Determine the date HUD or other funds were obligated/expended on each activity.				N/A in 2022
a. Compare this date to the date of the submission of the RROF and the date of the signed HUD-7015.16s.				N/A in 2022
b. Document all discrepancies.				N/A in 2022
I. Include in the workpapers a copy of one correctly completed record and documents to support errors disclosed on other records. The				N/A in 2022



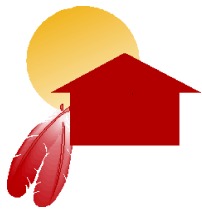
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errors documented will be the basis for the environmental finding.				N/A in 2022
J. Based on the number of errors, determine if expanding the sample size is appropriate.				N/A in 2022
IX. Environmental Assessments				-
A. If an activity is not exempt or categorically excluded, an Environmental Assessment (EA) must be completed.	24 CFR 58.36 24 CFR 58.40 thru 58.47			Read & Noted
B. Typical activities that require environmental assessments include:				N/A in 2022
1. Generally, new construction of 5 or more homes, or				N/A in 2022
2. Any activity involving the conversion from one type of land use to another.				N/A in 2022
C. Review and document that the recipient has adequately documented its EA by complying with the following:				N/A in 2022
1. Completed the HUD Recommended Format for Projects that Require an Environmental Assessment or an equivalent assessment format for each		https://www.hudexchange.info/resource/3140/p-art-58-		N/A in 2022



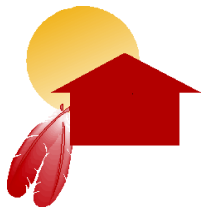
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project or activity on the list requiring an EA.		environmental-assessment-form/		N/A in 2022
D. Review and document each project description to ensure that it adequately describes the project and the activities.				N/A in 2022
1. Interview the project manager and other personnel.				N/A in 2022
2. Obtain an adequate project description if the documented description is not sufficient.				N/A in 2022
3. Ensure the additional information is added to the recipient's file.				N/A in 2022
4. The ERR is <u>not</u> considered complete or adequate if an adequate description is not provided.				N/A in 2022
5. This should be counted as an error, but does not constitute a finding by itself.				N/A in 2022
E. Determine if the responsible entity (the Tribe) reviewed the compliance with the applicable regulatory requirements.	24 CFR 58.6			N/A in 2022



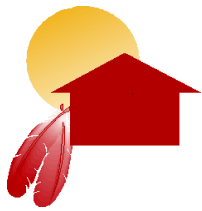
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1. If there is not adequate documentation of this review:				N/A in 2022
a. Get a copy of the Sample Statutory Checklist for Projects that Require an Environmental Assessment,	24 CFR 58.35(b)	(see link under IX.C.1, above)		N/A in 2022
c. Complete the Checklist, and advise the recipient to include it in its records for each project or activity in this category.				N/A in 2022
F. Does the ERR include the complete EA Format (including a statutory checklist)?				N/A in 2022
G. Did the recipient use the HUD-recommended format?				N/A in 2022
H. Did the recipient use recognized authoritative sources to support the conclusions reached?				N/A in 2022
I. Did the EA result in a Finding of No Significant Impact (FONSI)?	24 CFR 58.40(g)(1)			N/A in 2022
1. If so, obtain a copy of the FONSI.				N/A in 2022



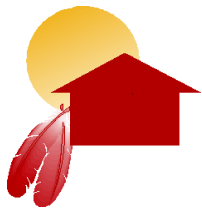
RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
J. Did the recipient provide adequate public notice for the FONSI - Notice of Intent to Request a Release of Funds (NOI/RROF)? Note: a combined notice is normally used; however, separate notices may be used.	24 CFR 58.43			N/A in 2022
1. Review the FONSI-NOI/RROF. Was the recommended HUD format or an equivalent used?				N/A in 2022
2. Obtain a copy of the actual notice and affidavit of publication or evidence of posting.				N/A in 2022
3. If the certifying officer is someone other than the CEO of the Tribe, ensure:				N/A in 2022
a. the certifying officer is properly designated, and				N/A in 2022
b. the information is adequate and accurate.				N/A in 2022
4. Determine if adequate time was provided for public comment.	24 CFR 58.45			N/A in 2022



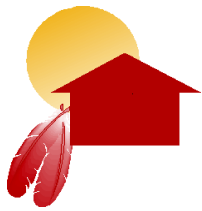
RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
K. Determine if the RROF was submitted to ONAP and if the Form HUD-7015.16, Authority to Use Grant Funds, was provided prior to the obligation/expenditure of funds for the project activity.	24 CFR 58.71			N/A in 2022
1. Obtain a copy of the HUD-7015.16 and ensure that it is signed by ONAP.	24 CFR 58.72(a) and 58.77(a)			N/A in 2022
2. Determine the date HUD or other funds were obligated/expended on each activity.				N/A in 2022
a. Obtain a copy of the accounting records and supporting documentation for the first expenditure/obligation for the project.				N/A in 2022
b. Compare this date to the date of the submission of the RROF and the date of the signed HUD-7015.16s				N/A in 2022
c. Document all discrepancies.				N/A in 2022
3. If the first expenditure/obligation is after the date of the signed HUD-7015.16, no further review is necessary.				N/A in 2022



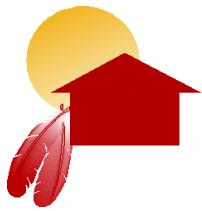
RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
4. If the first expenditure/obligation is prior to the date of the signed HUD-7015.16 (except for option agreements):				N/A in 2022
a. determine if it occurred prior to the submission date of the RROF,				N/A in 2022
b. determine the total amount expended or obligated prior to the submission and/or execution dates as compared to the total expenditures for the grant, and				N/A in 2022
L. Obtain and retain copies of documentation to support the determinations.				N/A in 2022
1. If there are no findings, one copy of each type of ERR as a sample is sufficient.				N/A in 2022
2. If there are findings, sufficient documentation should be retained to support the findings, i.e., copies of contracts when funds were obligated before the ERR was completed.				N/A in 2022
M. If the EA was not completed properly, <u>it is a finding.</u>				N/A in 2022



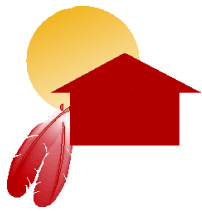
RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
1. There is no authority or basis for making it a concern.				N/A in 2022
2. Deficiencies are to be included in the summary.				N/A in 2022
N. Determine if the recipient carried out any necessary mitigating actions.				N/A in 2022
1. Are mitigating actions included in the ERR?				N/A in 2022
2. If there were mitigating actions, were they included in any contract documents or scope of work?				N/A in 2022
X. Environmental Impact Statement				-
A. Determine if an Environmental Impact Statement (EIS) was required.	24 CFR 58.37 24 CFR Part 58, Subparts F and G			Read & Noted
B. Was a Notice of Intent to prepare an EIS published?				N/A in 2022
1. Obtain a copy of the publication, along with an affidavit of publication.				N/A in 2022
2. Was the NOI also sent to interested individuals, local, state, and federal agencies, including Headquarters and				N/A in 2022



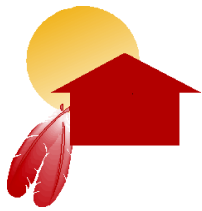
RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
the appropriate regional office of the Environmental Protection Agency?				N/A in 2022
C. Was a draft EIS prepared?				N/A in 2022
1. Review the EIS.				N/A in 2022
2. Document the work papers with photocopies and other evidential matter that is available.				N/A in 2022
3. Summarize the results of the review.				N/A in 2022
D. Did the draft EIS result in receipt of public comments?				N/A in 2022
1. If comments were received, did the recipient prepare a supplemental draft EIS?				N/A in 2022



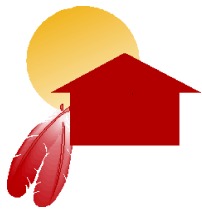
RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
2. Did the recipient disseminate the supplemental draft in the same manner as the draft EIS?				N/A in 2022
E. Did the recipient prepare a final EIS?				N/A in 2022
1. Did the recipient use the HUD-recommended format or an equivalent?				N/A in 2022
2. Did the recipient send the final EIS to ONAP?				N/A in 2022
3. If substantial changes were made to the project after preparation of the final EIS, did the recipient prepare a final supplemental EIS?				N/A in 2022
F. Did the recipient wait at least 60 days for comments after publishing the final or supplemental final EIS and prior to preparing a Record of Decision?				N/A in 2022
G. Document the reasoning for a determination of compliance/noncompliance for each ERR reviewed.				N/A in 2022
H. If it is determined that any of the ERRs are not in compliance and a 100 percent review was not completed, contact the Supervisor				N/A in 2022



RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
regarding expanding the review.				
XI. HUD Environmental Reviews and Clearance				-
Note: If the Tribe has assumed environmental review responsibilities under 24 CFR Part 58 for all identified projects, go to Section IV, Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities.				Read & Noted
A. Review files to determine if the recipient:				N/A in 2022
1. Submitted all available, relevant information necessary for ONAP to perform the environmental review for each property, as required by 24 CFR Part 50, or				N/A in 2022
2. Prepared an EA for HUD review and evaluation.		Notice PIH 2002-25 (originally issued as PIH Notice 99-37)		N/A in 2022
B. When on-site, review contract documents and scope of work documents to determine if the recipient carried out any required mitigating actions.				N/A in 2022




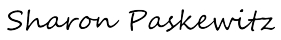
RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
1. If not, was another site selected as an alternative?				N/A in 2022
2. Was an EA conducted on the alternate site?				N/A in 2022
C. Review accounting records and contract documents to ensure the recipient did not obligate or expend funds prior to HUD approval and FONSI (if required) for activities which were subject to environmental review (all activities not listed in Section III.A. of PIH Notice 2002-25).		PIH Notice 1999-37 (extended indefinitely by PIH Notice 2002-25)		N/A in 2022
1. Did the recipient obligate/expend activities before receipt of HUD approval?				N/A in 2022
2. Did the recipient complete any mitigation required before undertaking an activity?				N/A in 2022
3. If the mitigation identified was not completed properly, it is a finding . There is no authority or basis for making it a concern.				N/A in 2022




RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
XII. Summary				
A. Summarize the results of the review in a work paper. B. Discuss significant issues with Supervisor. C. Develop findings, including questioned costs and corrective actions, as appropriate. D. Develop concerns because they could lead to a violation E. Develop report language, including any findings and concerns. F. If there are any major issues identified in this review and the recipient has approval to invest, determine if a withdrawal of investment authority should be recommended.				Program in compliance and no areas of weakness found.

Reviewer Name:	Lisabeth Nielssen, interviewed Sharon Paskewitz and Justin Krupa
Review Date(s):	10/21/2022

Lisabeth Nielssen: 

Sharon Paskewitz: 

Justin Krupa 

Reviewed and Approved by Carey Thurston, CFO:

SUMMARY OF LEVELS OF ENVIRONMENTAL REVIEW & DOCUMENTATION REQUIRED IN ERR

rev. 1-27-2010

LEVEL OF ENVIRONMENTAL REVIEW				
58.34 Exempt	58.35(b) Categorically Excluded NOT subject to 58.5	58.35(a) Categorically Excluded AND subject to 58.5 “A” checked for all on Statutory Worksheet*	58.35(a) Categorically Excluded AND subject to 58.5 statutory authorities: “B” checked for one or more on Statutory Worksheet*	58.36 NEPA Environmental Assessment
TYPE OF ACTIVITIES				
Environmental and other studies Resource Identification Development of plans and strategies Information and financial services Administrative and Management Activities Public services, i.e., employment, crime prevention, child care, health, drug abuse, education, counseling, energy conservation, welfare, recreational needs Inspections and testing for hazards or defects Purchase insurance and tools Engineering or design costs Technical assistance and training Temporary or permanent improvements that do not alter environmental conditions and are limited to protection, repair or restoration activities to control or arrest the effects from disasters or imminent threats to public safety, including those resulting from physical deterioration. Payments of principal and interest on loans or obligations guaranteed by HUD	Tenant-based rental assistance Supportive services such as health care, housing services, permanent housing placement, day care, nutritional services, short-term payments for rent, mortgage, or utilities, assistance in gaining access to government benefits. Operating costs including maintenance, furnishings, security, equipment, operation, supplies, utilities, staff training and recruitment Economic development activities including equipment purchase, inventory financing, interest subsidy, operating costs, and other expenses not associated with construction or expansion Activities to assist homeownership of existing dwelling units or units under construction, including closing costs and down payment assistance to homebuyers, interest buy downs or other actions resulting in transfer of title. Affordable housing pre-development costs: legal consulting, developer and other site-option costs, project financing, administrative costs for loan commitments, zoning approvals, and other activities which don't have a physical impact. Approval of supplemental assistance (including insurance or guarantee) to a project previously approved under Part 58, if: approval is by same the RE, and re-evaluation is not required, per 58.47	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 of more than 20% <ul style="list-style-type: none">Replacement of water or sewer linesReconstruction of curbs & sidewalksrepaving 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. Single Family Housing Rehab <ul style="list-style-type: none">Unit density is not increased beyond 4 units,Project doesn't involve change in land use from residential to non-residentialThe footprint of the building in not increased in a floodplain or a wetland. Multifamily Housing Rehab <ul style="list-style-type: none">Unit density change is not more than 20%Project doesn't involve change in land use from residential to non-residentialCost of rehabilitation is less than 75% of the estimated cost of replacement after rehab Non-Residential Structures <ul style="list-style-type: none">Facilities and improvements were in place and will not be changed in size or capacity by more than 20%Activity does not involve change in land use from non-residential to residential, commercial to industrial, or one industrial use to another Individual action (e.g., disposition, new construction, demolition, acquisition) on a 1 to 4 family dwelling; or individual action on five or more units scattered on sites more than 2000 feet apart and no more than 4 units per site. Acquisition (including leasing) or disposition of, or equity loans on 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		Activities not exempt or categorically excluded. Generally, new construction of 5 or more homes, and conversion from one type of land use to another.
DOCUMENTATION REQUIRED IN ERR				
Describe activity and make a written determination of exemption. Also, determine compliance with 58.6: <ul style="list-style-type: none">National Flood Insurance ProgramCoastal Barrier Resource ActRunway Clear Zones	Describe activity and make a written 58.35(b) determination. Also, determine compliance with 58.6: <ul style="list-style-type: none">National Flood Insurance Program (NFIP)Coastal Barrier Resource Act (CBRA)Runway Clear Zones	Complete Statutory Worksheet, (sec. 58.5) and indicate converts exempt. Also, determine compliance with 58.6 <ul style="list-style-type: none">NFIPCBRARunway Clear Zones	Complete Statutory Worksheet (sec. 58.5) NOI/RROF notification RROF & Certification (form 7015.15) Authority to Use Grant Funds (form 7015.16) Also, determine compliance with 58.6 <ul style="list-style-type: none">National Flood Insurance ProgramCoastal Barrier Resource ActRunway Clear Zones	Environmental Assessment (including Statutory Checklist)* FONSI and NOI/RROF notification Form 7015.15 Form 7015.16 Also, determine compliance with 58.6

*HUD recommended format

Adapted from chart prepared by Anchorage Office of Native American Programs, HUD

SAMISH INDIAN NATION:

DETERMINATION OF EXEMPTION

NAHASDA Grant Number:

55IT5313870

Time period covered by this Environmental Review:

January 1, 2022, through December 31, 2022

Project Name / Description:

SAMISH NAHASDA ADMINISTRATION (SUB0001) & MANAGEMENT (SUB0019)

Administrative and management activities are necessary to operate our Housing Program and provide services to program participants. These activities include indirect services such as accounts payable and receivable, payroll processing, budget monitoring, expenditure approval, fiscal reporting, and other general Tribe-wide management provided by our Chief Operations Officer, Chief Financial Officer, Senior Compliance Officer, Human Resources Officer, and our other indirect employees. In addition, direct management activities will also be undertaken to ensure program implementation, such as programmatic reporting, grant budget creation and maintenance, generating POs for expenditures, maintaining file organization, processing applications, and maintaining client services. These activities result in no human environmental impact.

This project is determined to be Exempt according to:

24CFR §58.34(a)(3)

Requirements under 24CFR58.6

FLOOD INSURANCE /FLOOD DISASTER PROTECTION ACT

- 1. Does the project involve the acquisition, construction or rehabilitation of structures, buildings or mobile homes?**

☒ No; flood insurance is not required. Factor review completed

☐ Yes, continue.

- 2. Is the structure or part of the structure located in a FEMA designated Special Flood Hazard Area?**

☐ Source Document (FEMA/FIRM floodplain zone designation, map panel number, date, or other credible source): Factor review completed. Flood insurance is not required.

☐ Yes. Source Document (FEMA/FIRM floodplain zone designation, panel number, date): **Continue review.**

3. Is the community participating in the National Insurance Program (or has less than one year passed since FEMA notification of Special Flood Hazards)?

☐ Yes,

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 in the Environmental Review Record.]

☐ No

COASTAL BARRIERS RESOURCES ACT

1. Does the project involve any of the following uses of Federal assistance:

- acquisition, construction, repair, improvement, or rehabilitation of public facilities.
- acquisition, construction, repair, improvement, or rehabilitation of residential or nonresidential structures.
- flood insurance for new or improved structures.
- erosion control or stabilization of inlet, shoreline, or inshore areas?

☒ No, Factor review completed

☐ Yes, continue.

2. Is the project in an area along the Atlantic Coast, Gulf of Mexico, or Great Lakes?

☒ No; Cite Source Documentation: Factor review completed

☐ Yes, continue

3. Is the project located in a coastal barrier resource designated on a FEMA map? (See www.fema.gov/nfip/cobra.shtm).

☐ No; Cite Source Documentation: Factor review completed

☐ Yes - **Federal assistance may not be used in such an area.**

AIRPORT RUNWAY CLEAR ZONES AND CLEAR ZONES DISCLOSURES

1. Does the project involve the sale or acquisition of an existing building or structure?

☒ No. Factor review completed

☐ Yes, continue.

2. Is the building/structure within a Civil Airport's Runway Clear Zone, Approach Protection Zone, or a Military Installation's Clear Zone?

☐ No; Cite Source Documentation: Project complies with 24 CFR 51.303(a)(3). The review of this factor is completed.

☐ Yes, **Disclosure statement must be provided** to buyer and a copy of the signed disclosure statement must be maintained in this Environmental Review Record [24 CFR 51.303(a)(3)].

Completed by: Sharon Paskewitz
Sharon Paskewitz, Housing Director

Date: 10/21/22

Completed by: 
Justin Krupa, Team Leader

Date: 10/21/22

Reviewed by: 
Lisabeth Nielssen, Compliance Officer

Date: 10/21/22

SAMISH INDIAN NATION:

DETERMINATION OF EXEMPTION

NAHASDA Grant Number:

55IT5313870

Time period covered by this Environmental Review:

January 1, 2022, through December 31, 2022

Project Name / Description:

SAMISH NAHASDA ENVIRONMENTAL & OTHER STUDIES

The Samish NAHASDA Housing program may be having environmental and other studies conducted to ensure full compliance with HUD regulations, and other jurisdictional regulations and zoning requirements, related to both the acquisition and development of affordable housing under our program. These activities result in no human environmental impact.

This project is determined to be Exempt according to:

24CFR §58.34(a)(1)

Requirements under 24CFR58.6

FLOOD INSURANCE /FLOOD DISASTER PROTECTION ACT

- 1. Does the project involve the acquisition, construction or rehabilitation of structures, buildings or mobile homes?**

☒ No; flood insurance is not required. **Factor review completed**

☐ Yes, continue.

- 2. Is the structure or part of the structure located in a FEMA designated Special Flood Hazard Area?**

☐ No. Source Document (FEMA/FIRM floodplain zone designation, map panel number, date, or other credible source): Factor review completed. Flood insurance is not required.

☐ Yes. Source Document (FEMA/FIRM floodplain zone designation, panel number, date): **Continue review.**

- 3. Is the community participating in the National Insurance Program (or has less than one year passed since FEMA notification of Special Flood Hazards)?**

☐ Yes,

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 in the Environmental Review Record.]

☐ No

COASTAL BARRIERS RESOURCES ACT

1. Does the project involve any of the following uses of Federal assistance:

- acquisition, construction, repair, improvement, or rehabilitation of public facilities.
- acquisition, construction, repair, improvement, or rehabilitation of residential or nonresidential structures.
- flood insurance for new or substantially improved structures.
- erosion control or stabilization of inlet, shoreline, or inshore areas?

☒ No. **Factor review completed**

☐ Yes, continue.

2. Is the project in an area along the Atlantic Coast, Gulf of Mexico, or Great Lakes?

☒ No; Cite Source Documentation: Factor review completed

☐ Yes, continue

3. Is the project located in a coastal barrier resource designated on a FEMA map? (See www.fema.gov/nfip/cobra.shtm).

☐ No; Cite Source Documentation: Factor review completed

☐ Yes - **Federal assistance may not be used in such an area.**

AIRPORT RUNWAY CLEAR ZONES AND CLEAR ZONES DISCLOSURES

1. Does the project involve the sale or acquisition of an existing building or structure?

☒ No. **Factor review completed**

☐ Yes, continue.

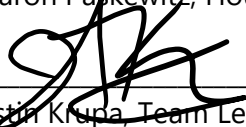
2. Is the building/structure within a Civil Airport's Runway Clear Zone, Approach Protection Zone or a Military Installation's Clear Zone?

☐ No; Cite Source Documentation: Project complies with 24 CFR 51.303(a)(3). The review of this factor is completed.

☐ Yes, **Disclosure statement must be provided** to buyer and a copy of the signed disclosure statement must be maintained in this Environmental Review Record [24 CFR 51.303(a)(3)].

Completed by: Sharon Paskewitz
Sharon Paskewitz, Housing Director

Date: 10/21/22

Completed by: 
Justin Krupa, Team Lead

Date: 10/21/22

Reviewed by: 
Lisabeth Nielssen, Compliance Officer

Date: 10/21/22

SAMISH INDIAN NATION:

DETERMINATION OF EXEMPTION

NAHASDA Grant Number:

55IT5313870

Time period covered by this Environmental Review:

January 1, 2022, through December 31, 2022

Project Name / Description:

SAMISH NAHASDA: INSPECTIONS OF PROPERTIES FOR HAZARD OR DEFECTS (0017), (0018), (0007), & (0020)

We may conduct this activity during approving a dwelling for our Rental Assistance, Homelessness Prevention, or Rapid Rehousing programs. This activity results in no human environmental impact.

This project is determined to be Exempt according to:

24CFR §58.34(a)(5)

Requirements under 24CFR58.6

FLOOD INSURANCE /FLOOD DISASTER PROTECTION ACT

- 1. Does the project involve the acquisition, construction or rehabilitation of structures, buildings or mobile homes?**

☒ No; flood insurance is not required. Factor review completed

☐ Yes, continue.

- 2. Is the structure or part of the structure located in a FEMA designated Special Flood Hazard Area?**

☐ No. Source Document (FEMA/FIRM floodplain zone designation, map panel number, date, or other credible source): Factor review completed. Flood insurance is not required.

☐ Yes. Source Document (FEMA/FIRM floodplain zone designation, panel number, date): **Continue review.**

- 3. Is the community participating in the National Insurance Program (or has less than one year passed since FEMA notification of Special Flood Hazards)?**

☐ Yes,

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 in the Environmental Review Record.]

☐ No

COASTAL BARRIERS RESOURCES ACT

1. Does the project involve any of the following uses of Federal assistance:

- acquisition, construction, repair, improvement, or rehabilitation of public facilities.
- acquisition, construction, repair, improvement, or rehabilitation of residential or nonresidential structures.
- flood insurance for new or substantially improved structures.
- erosion control or stabilization of inlet, shoreline, or inshore areas?

☒ No, Factor review completed

☐ Yes, continue.

2. Is the project in an area along the Atlantic Coast, Gulf of Mexico, or Great Lakes?

☒ No; Cite Source Documentation: Factor review completed

☐ Yes, continue

3. Is the project located in a coastal barrier resource designated on a FEMA map? (See www.fema.gov/nfip/cobra.shtm).

☐ No; Cite Source Documentation: Factor review completed

☐ Yes - **Federal assistance may not be used in such an area.**

AIRPORT RUNWAY CLEAR ZONES AND CLEAR ZONES DISCLOSURES

1. Does the project involve the sale or acquisition of an existing building or structure?

☒ No. Factor review completed

☐ Yes, continue.

2. Is the building/structure within a Civil Airport's Runway Clear Zone, Approach Protection Zone or a Military Installation's Clear Zone?

☐ No; Cite Source Documentation: Project complies with 24 CFR 51.303(a)(3). The review of this factor is completed.

☐ Yes, **Disclosure statement must be provided** to buyer and a copy of the signed disclosure statement must be maintained in this Environmental Review Record [24 CFR 51.303(a)(3)].

Completed by: Sharon Paskewitz

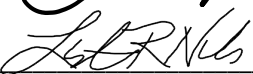
Sharon Paskewitz, Housing Director

Date: 10-21-2022

Completed by: 

Justin Krupa, Team Leader

Date: 10/21/22

Reviewed by: 

Lisabeth Nielssen, Senior Compliance Officer

Date: 10/21/22

SAMISH INDIAN NATION:

DETERMINATION OF EXEMPTION

NAHASDA Grant Number:

55IT5313870

Time period covered by this Environmental Review:

January 1, 2022, through December 31, 2022

Project Name / Description:

SAMISH NAHASDA PURCHASE OF INSURANCE (SUB 0007, 0020)

The Samish Housing Department may find it necessary to purchase insurance for the acquisition, renovation, and operation of an Emergency Shelter for Samish citizens. We may also choose to purchase insurance as a service for clients participating in our Tenant Based Rental Assistance (TBRA) program. This activity results in no human environmental impact.

This project is determined to be Exempt according to:

24CFR §58.34(a)(6)

Requirements under 24CFR58.6

FLOOD INSURANCE /FLOOD DISASTER PROTECTION ACT

1. Does the project involve the acquisition, construction or rehabilitation of structures, buildings or mobile homes?

☒ No; flood insurance is not required. Factor review completed

☐ Yes, continue.

2. Is the structure or part of the structure located in a FEMA designated Special Flood Hazard Area?

☐ Source Document (FEMA/FIRM floodplain zone designation, map panel number, date, or other credible source): Factor review completed. Flood insurance is not required.

☐ Yes. Source Document (FEMA/FIRM floodplain zone designation, panel number, date): **Continue review.**

3. Is the community participating in the National Insurance Program (or has less than one year passed since FEMA notification of Special Flood Hazards)?

☐ Yes,

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 in the Environmental Review Record.]

☐ No

COASTAL BARRIERS RESOURCES ACT

1. Does the project involve any of the following uses of Federal assistance:

- acquisition, construction, repair, improvement, or rehabilitation of public facilities.
- acquisition, construction, repair, improvement, or rehabilitation of residential or nonresidential structures.
- flood insurance for new or substantially improved structures.
- erosion control or stabilization of inlet, shoreline, or inshore areas?

☒ No, Factor review completed

☐ Yes, continue.

2. Is the project in an area along the Atlantic Coast, Gulf of Mexico, or Great Lakes?

☒ No; Cite Source Documentation: Factor review completed

☐ Yes, continue

3. Is the project located in a coastal barrier resource designated on a FEMA map? (See www.fema.gov/nfip/cobra.shtm).

☐ No; Cite Source Documentation: Factor review completed

☐ Yes - **Federal assistance may not be used in such an area.**

AIRPORT RUNWAY CLEAR ZONES AND CLEAR ZONES DISCLOSURES

1. Does the project involve the sale or acquisition of an existing building or structure?

☒ No. Factor review completed

☐ Yes, continue.

2. Is the building/structure within a Civil Airport's Runway Clear Zone, Approach Protection Zone or a Military Installation's Clear Zone?

☐ No; Cite Source Documentation: Project complies with 24 CFR 51.303(a)(3). The review of this factor is completed.

☐ Yes, **Disclosure statement must be provided** to buyer and a copy of the signed disclosure statement must be maintained in this Environmental Review Record [24 CFR 51.303(a)(3)].

Completed by: Sharon Paskewitz

Sharon Paskewitz, Housing Director

Date: 10-21-2022

Completed by: 

Justin Krupa, Team Leader

Date: 10/21/22

Reviewed by: 

Lisabeth Nielssen, Senior Compliance Officer

Date: 10/21/22

SAMISH INDIAN NATION:

DETERMINATION OF EXEMPTION

NAHASDA Grant Number:

55IT5313870

Time period covered by this Environmental Review:

January 1, 2022, through December 31, 2022

Project Name / Description:

SAMISH NAHASDA: OPERATING COSTS (0001), (0017), (0018), (0007) & (0020)

Samish Housing Department will have operating costs including maintenance, furnishings, security, equipment, operation, supplies, utilities, insurance, staff training & recruitment needed to run our Housing Department and offer all Housing related services. Additionally, we will have operating costs specific to the operation of our emergency shelter to ensure its intended use for occupancy by qualified residents. Services offered to shelter residents may include those that keep the property clean and safe for occupancy but may also include other supportive services and accommodations as needed. These activities result in no human environmental impact.

This project is determined to be Categorically Excluded from NEPA and does not require that an RROF (HUD 7015.15) is completed and submitted to HUD under 24CFR §58.35(b)(3).

Requirements under 24CFR58.6

FLOOD INSURANCE /FLOOD DISASTER PROTECTION ACT

1. Does the project involve the acquisition, construction or rehabilitation of structures, buildings or mobile homes?

☒ No; flood insurance is not required. Factor review completed

☐ Yes, continue.

2. Is the structure or part of the structure located in a FEMA designated Special Flood Hazard Area?

☐ Source Document (FEMA/FIRM floodplain zone designation, map panel number, date, or other credible source): Factor review completed. Flood insurance is not required.

☐ Yes. Source Document (FEMA/FIRM floodplain zone designation, panel number, date): **Continue review.**

3. Is the community participating in the National Insurance Program (or has less than one year passed since FEMA notification of Special Flood Hazards)?

☐ Yes,

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 in the Environmental Review Record.]

☐ No

COASTAL BARRIERS RESOURCES ACT

1. Does the project involve any of the following uses of Federal assistance:

- acquisition, construction, repair, improvement, or rehabilitation of public facilities.
- acquisition, construction, repair, improvement, or rehabilitation of residential or nonresidential structures.
- flood insurance for new or substantially improved structures.
- erosion control or stabilization of inlet, shoreline, or inshore areas?

☒ No, Factor review completed

☐ Yes, continue.

2. Is the project in an area along the Atlantic Coast, Gulf of Mexico, or Great Lakes?

☒ No; Cite Source Documentation: Factor review completed

☐ Yes, continue

3. Is the project located in a coastal barrier resource designated on a FEMA map? (See www.fema.gov/nfip/cobra.shtm).

☐ No; Cite Source Documentation: Factor review completed

☐ Yes - **Federal assistance may not be used in such an area.**

AIRPORT RUNWAY CLEAR ZONES AND CLEAR ZONES DISCLOSURES

1. Does the project involve the sale or acquisition of an existing building or structure?

☒ No. Factor review completed

☐ Yes, continue.


2. Is the building/structure within a Civil Airport's Runway Clear Zone, Approach Protection Zone or a Military Installation's Clear Zone?

☐ No; Cite Source Documentation: Project complies with 24 CFR 51.303(a)(3). The review of this factor is completed.


☐ Yes, **Disclosure statement must be provided** to buyer and a copy of the signed disclosure statement must be maintained in this Environmental Review Record [24 CFR 51.303(a)(3)].

Completed by: Sharon Paskewitz
Sharon Paskewitz, Housing Director

Date: 10-21-2022

Completed by: 
Justin Krupa, Team Leader

Date: 10/21/22

Reviewed by: 
Lisabeth Nielssen, Senior Compliance Officer

Date: 10/21/22

SAMISH INDIAN NATION: DETERMINATION OF EXEMPTION

NAHASDA Grant Number:

55IT5313870

Time period covered by this Environmental Review:

January 1, 2022, through December 31, 2022

Project Name / Description:

SAMISH NAHASDA: Development of Plans and Strategies; Information and Financial Services; Resource Identification.

Diversify our funding source; development and implement other housing programs that will address unmet housing needs. Additionally, we may offer other financial and information services for clients. This activity results in no human environmental impact.

This project is determined to be Exempt according to: 24CFR §58.34(a)(1) and (a)(2)

Requirements under 24CFR58.6

FLOOD INSURANCE /FLOOD DISASTER PROTECTION ACT

1. Does the project involve the acquisition, construction or rehabilitation of structures, buildings or mobile homes?

☒ No; flood insurance is not required. Factor review completed

☐ Yes, continue.

2. Is the structure or part of the structure located in a FEMA designated Special Flood Hazard Area?

☐ Source Document (FEMA/FIRM floodplain zone designation, map panel number, date, or other credible source): Factor review completed. Flood insurance is not required.

☐ Yes. Source Document (FEMA/FIRM floodplain zone designation, panel number, date): **Continue review.**

3. Is the community participating in the National Insurance Program (or has less than one year passed since FEMA notification of Special Flood Hazards)?

☐ Yes,

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 in the Environmental Review Record.]

☐ No

COASTAL BARRIERS RESOURCES ACT

1. Does the project involve any of the following uses of Federal assistance:

- acquisition, construction, repair, improvement, or rehabilitation of public facilities.
- acquisition, construction, repair, improvement, or rehabilitation of residential or nonresidential structures.
- flood insurance for new or substantially improved structures.
- erosion control or stabilization of inlet, shoreline, or inshore areas?

☒ No, Factor review completed

☐ Yes, continue.

2. Is the project in an area along the Atlantic Coast, Gulf of Mexico, or Great Lakes?

☒ No; Cite Source Documentation: Factor review completed

☐ Yes, continue

3. Is the project located in a coastal barrier resource designated on a FEMA map? (See www.fema.gov/nfip/cobra.shtm).

☐ No; Cite Source Documentation: Factor review completed

☐ Yes - **Federal assistance may not be used in such an area.**

AIRPORT RUNWAY CLEAR ZONES AND CLEAR ZONES DISCLOSURES

1. Does the project involve the sale or acquisition of an existing building or structure?

☒ No. Factor review completed

☐ Yes, continue.

2. Is the building/structure within a Civil Airport's Runway Clear Zone, Approach Protection Zone or a Military Installation's Clear Zone?

☐ No; Cite Source Documentation: Project complies with 24 CFR 51.303(a)(3). The review of this factor is completed.

☐ Yes, **Disclosure statement must be provided** to buyer and a copy of the signed disclosure statement must be maintained in this Environmental Review Record [24 CFR 51.303(a)(3)].

Completed by: Sharon Paskewitz


Sharon Paskewitz, Housing Director

Date: 10-21-2022

Completed by: 

Justin Krupa, Team Leader

Date: 10/21/22

Reviewed by: 

Lisabeth Nielssen, Senior Compliance Officer

Date: 10/21/2022

SAMISH INDIAN NATION: DETERMINATION OF EXEMPTION

NAHASDA Grant Number:

55IT5313870

Time period covered by this Environmental Review:

January 1, 2022, through December 31, 2022

Project Name / Description:

SAMISH NAHASDA: Pre-Development of Emergency Shelter (0007)

This program will entail Emergency Shelter pre-development costs including legal, consulting, developer and other costs related to obtaining site options, project financing, administrative costs and fees for loan commitments, zoning approvals, project engineering and design, and other related activities. These activities result in no human environmental impact.

Any acquisition or renovation activity under this program that may result in an environmental impact will undergo a site-specific ER as applicable under HUD regulations and will not be covered under this Annual ER.

This project is determined to be Categorically Excluded from NEPA and does not require that an RROF (HUD 7015.15) is completed and submitted to HUD under 24 CFR §58.34(a)(8) and 24CFR §58.35(b)(6).

Requirements under 24CFR58.6

FLOOD INSURANCE /FLOOD DISASTER PROTECTION ACT

1. Does the project involve the acquisition, construction or rehabilitation of structures, buildings or mobile homes?

☒ No; flood insurance is not required. Factor review completed

☐ Yes, continue.

2. Is the structure or part of the structure located in a FEMA designated Special Flood Hazard Area?

☐ Source Document (FEMA/FIRM floodplain zone designation, map panel number, date, or other credible source): Factor review completed. Flood insurance is not required.

☐ Yes. Source Document (FEMA/FIRM floodplain zone designation, panel number, date): **Continue review.**

3. Is the community participating in the National Insurance Program (or has less than one year passed since FEMA notification of Special Flood Hazards)?

☐ Yes,

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 in the Environmental Review Record.]

☐ No

COASTAL BARRIERS RESOURCES ACT

1. Does the project involve any of the following uses of Federal assistance:

- acquisition, construction, repair, improvement, or rehabilitation of public facilities.
- acquisition, construction, repair, improvement, or rehabilitation of residential or nonresidential structures.
- flood insurance for new or substantially improved structures.
- erosion control or stabilization of inlet, shoreline, or inshore areas?

☒ No, Factor review completed

☐ Yes, continue.

2. Is the project in an area along the Atlantic Coast, Gulf of Mexico, or Great Lakes?

☒ No; Cite Source Documentation: Factor review completed

☐ Yes, continue

3. Is the project located in a coastal barrier resource designated on a FEMA map? (See www.fema.gov/nfip/cobra.shtm).

☐ No; Cite Source Documentation: Factor review completed

☐ Yes - **Federal assistance may not be used in such an area.**

AIRPORT RUNWAY CLEAR ZONES AND CLEAR ZONES DISCLOSURES

1. Does the project involve the sale or acquisition of an existing building or structure?

☒ No. Factor review completed


☐ Yes, continue.

2. Is the building/structure within a Civil Airport's Runway Clear Zone, Approach Protection Zone or a Military Installation's Clear Zone?


- ☐ No; Cite Source Documentation: Project complies with 24 CFR 51.303(a)(3). The review of this factor is completed.
- ☐ Yes, **Disclosure statement must be provided** to buyer and a copy of the signed disclosure statement must be maintained in this Environmental Review Record [24 CFR 51.303(a)(3)].

Completed by: Sharon Paskewitz
Sharon Paskewitz, Housing Director

Date: 10-21-2022

Completed by: 
Justin Krupa, Team Leader

Date: 10/21/22

Reviewed by: 
Lisabeth Nielssen, Senior Compliance Officer

Date: 10/21/2022

SAMISH INDIAN NATION: DETERMINATION OF EXEMPTION

NAHASDA Grant Number:

55IT5313870

Time period covered by this Environmental Review:

January 1, 2022, through December 31, 2022

Project Name / Description:

SAMISH NAHASDA: Supportive Services - Other Housing Services (0007), (0017), (0018), & (0020)

The Samish Indian Nation Housing Department may provide supportive services such as permanent housing placement, housing search and relocation, short-term payments for rent and utility assistance, first, last and security deposits, and renter's insurance to housing clients. Life Skills Education Classes and resources may be provided to housing clients and Samish tribal citizens. Topics could include technology use; employment, economic management, such as budgeting and credit development or repair, basic home maintenance, such as weatherization, and other classes that will help families obtain and retain their housing stability. These activities result in no human environmental impact.

This project is determined to be Categorically Excluded from NEPA and does not require and RROF (HUD 7015.15) is completed and submitted to HUD under 24 CFR §58.35(b)(2).

Requirements under 24CFR58.6

FLOOD INSURANCE /FLOOD DISASTER PROTECTION ACT

1. Does the project involve the acquisition, construction or rehabilitation of structures, buildings or mobile homes?

☒ No; flood insurance is not required. Factor review completed

☐ Yes, continue.

2. Is the structure or part of the structure located in a FEMA designated Special Flood Hazard Area?

☐ Source Document (FEMA/FIRM floodplain zone designation, map panel number, date, or other credible source): Factor review completed. Flood insurance is not required.

☐ Yes. Source Document (FEMA/FIRM floodplain zone designation, panel number, date): **Continue review.**

3. Is the community participating in the National Insurance Program (or has less than one year passed since FEMA notification of Special Flood Hazards)?

☐ Yes,

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 in the Environmental Review Record.]

☐ No

COASTAL BARRIERS RESOURCES ACT

1. Does the project involve any of the following uses of Federal assistance:

- acquisition, construction, repair, improvement, or rehabilitation of public facilities.
- acquisition, construction, repair, improvement, or rehabilitation of residential or nonresidential structures.
- flood insurance for new or improved structures.
- erosion control or stabilization of inlet, shoreline, or inshore areas?

☒ No, Factor review completed

☐ Yes, continue.

2. Is the project in an area along the Atlantic Coast, Gulf of Mexico, or Great Lakes?

☒ No; Cite Source Documentation: Factor review completed

☐ Yes, continue

3. Is the project located in a coastal barrier resource designated on a FEMA map? (See www.fema.gov/nfip/cobra.shtm).

☐ No; Cite Source Documentation: Factor review completed

☐ Yes - **Federal assistance may not be used in such an area.**

AIRPORT RUNWAY CLEAR ZONES AND CLEAR ZONES DISCLOSURES

1. Does the project involve the sale or acquisition of an existing building or structure?

☒ No. Factor review completed

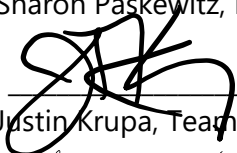
☐ Yes, continue.

2. Is the building/structure within a Civil Airport's Runway Clear Zone, Approach Protection Zone, or a Military Installation's Clear Zone?

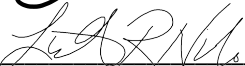
- ☐ No; Cite Source Documentation: Project complies with 24 CFR 51.303(a)(3). The review of this factor is completed.
- ☐ Yes, **Disclosure statement must be provided** to buyer and a copy of the signed disclosure statement must be maintained in this Environmental Review Record [24 CFR 51.303(a)(3)].

Completed by: Sharon Paskewitz
Sharon Paskewitz, Housing Director

Date: 10-21-2022

Completed by: 
Justin Krupa, Team Leader

Date: 10/21/22

Reviewed by: 
Lisabeth Nielssen, Senior Compliance Officer

Date: 10/21/2022

SAMISH INDIAN NATION:

DETERMINATION OF EXEMPTION

NAHASDA Grant Number:

55IT5313870

Time period covered by this Environmental Review:

January 1, 2022, through December 31, 2022

Project Name / Description:

SAMISH NAHASDA: TENENT BASED RENTAL ASSISTANCE (0017)

The Tenant Based Rental Assistance program (TBRA) provides targeted, low-income households with security deposits and rent assistance. Eligible households must have incomes that do not exceed 80 percent of the median household income for their area, per the published income limits by the U.S. Department of Housing and Urban Development (HUD). Eligible households may receive the deposits necessary to get them into a unit, or a combination of deposits and rental subsidies that enable them to pay no more than the approved percent of their household income for rent and utilities. If a household is unable to leave the program after the designated period, their assistance may be renewed if funding allows. The tenant rent share increases as the tenant income increases. This activity results in no human environmental impact.

This project is determined to be Categorically Excluded from NEPA and does not require that an RROF (HUD 7015.15) is completed and submitted to HUD under 24CFR §58.35(b)(1).

Requirements under 24CFR58.6

FLOOD INSURANCE /FLOOD DISASTER PROTECTION ACT

1. Does the project involve the acquisition, construction or rehabilitation of structures, buildings or mobile homes?

☒ No; flood insurance is not required. Factor review completed

☐ Yes, continue.

2. Is the structure or part of the structure located in a FEMA designated Special Flood Hazard Area?

☐ Source Document (FEMA/FIRM floodplain zone designation, map panel number, date, or other credible source): Factor review completed. Flood insurance is not required.

☐ Yes. Source Document (FEMA/FIRM floodplain zone designation, panel number, date): **Continue review.**

3. Is the community participating in the National Insurance Program (or has less than one year passed since FEMA notification of Special Flood Hazards)?

☐ Yes,

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 in the Environmental Review Record.]

☐ No

COASTAL BARRIERS RESOURCES ACT

1. Does the project involve any of the following uses of Federal assistance:

- acquisition, construction, repair, improvement, or rehabilitation of public facilities.
- acquisition, construction, repair, improvement, or rehabilitation of residential or nonresidential structures.
- flood insurance for new or improved structures.
- erosion control or stabilization of inlet, shoreline, or inshore areas?

☒ No, Factor review completed

☐ Yes, continue.

2. Is the project in an area along the Atlantic Coast, Gulf of Mexico, or Great Lakes?

☒ No; Cite Source Documentation: Factor review completed

☐ Yes, continue

3. Is the project located in a coastal barrier resource designated on a FEMA map? (See www.fema.gov/nfip/cobra.shtm).

☐ No; Cite Source Documentation: Factor review completed

☐ Yes - **Federal assistance may not be used in such an area.**

AIRPORT RUNWAY CLEAR ZONES AND CLEAR ZONES DISCLOSURES

1. Does the project involve the sale or acquisition of an existing building or structure?

☒ No. Factor review completed

☐ Yes, continue.


2. Is the building/structure within a Civil Airport's Runway Clear Zone, Approach Protection Zone, or a Military Installation's Clear Zone?

☐ No; Cite Source Documentation: Project complies with 24 CFR 51.303(a)(3). The review of this factor is completed.

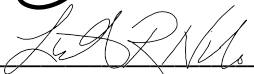
☐ Yes, **Disclosure statement must be provided** to buyer and a copy of the signed disclosure statement must be maintained in this Environmental Review Record [24 CFR 51.303(a)(3)].

Completed by: Sharon Paskewitz
Sharon Paskewitz, Housing Director

Date: 10-21-2022

Completed by: 
Justin Krupa, Team Leader

Date: 10/21/20

Reviewed by: 
Lisabeth Nielssen, Senior Compliance Officer

Date: 10/21/2022

SAMISH INDIAN NATION:

DETERMINATION OF EXEMPTION

NAHASDA Grant Number:

55IT5313870

Time period covered by this Environmental Review:

January 1, 2022, through December 31, 2022

Project Name / Description:

SAMISH NAHASDA PURCHASE OF TOOLS (0017), (0018), (0019) & (0020)

The Samish Housing Department may find it necessary to purchase tools to complete the required inspections on properties inhabited by Samish clients. This activity results in no human environmental impact.

This project is determined to be Exempt according to:

24CFR §58.34(a)(7)

Requirements under 24CFR58.6

FLOOD INSURANCE /FLOOD DISASTER PROTECTION ACT

1. Does the project involve the acquisition, construction or rehabilitation of structures, buildings or mobile homes?

☒ No; flood insurance is not required. Factor review completed

☐ Yes, continue.

2. Is the structure or part of the structure located in a FEMA designated Special Flood Hazard Area?

☐ No. Source Document (FEMA/FIRM floodplain zone designation, map panel number, date, or other credible source): Factor review completed. Flood insurance is not required.

☐ Yes. Source Document (FEMA/FIRM floodplain zone designation, panel number, date): **Continue review.**

3. Is the community participating in the National Insurance Program (or has less than one year passed since FEMA notification of Special Flood Hazards)?

☐ Yes,

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 in the Environmental Review Record.]

☐ No

COASTAL BARRIERS RESOURCES ACT

1. Does the project involve any of the following uses of Federal assistance:

- acquisition, construction, repair, improvement, or rehabilitation of public facilities.
- acquisition, construction, repair, improvement, or rehabilitation of residential or nonresidential structures.
- flood insurance for new or substantially improved structures.
- erosion control or stabilization of inlet, shoreline, or inshore areas?

☒ No, Factor review completed

☐ Yes, continue.

2. Is the project in an area along the Atlantic Coast, Gulf of Mexico, or Great Lakes?

☒ No; Cite Source Documentation: Factor review completed

☐ Yes, continue

3. Is the project located in a coastal barrier resource designated on a FEMA map? (See www.fema.gov/nfip/cobra.shtm).

☐ No; Cite Source Documentation: Factor review completed

☐ Yes - **Federal assistance may not be used in such an area.**

AIRPORT RUNWAY CLEAR ZONES AND CLEAR ZONES DISCLOSURES

1. Does the project involve the sale or acquisition of an existing building or structure?

☒ No. Factor review completed

☐ Yes, continue.


2. Is the building/structure within a Civil Airport's Runway Clear Zone, Approach Protection Zone or a Military Installation's Clear Zone?

☐ No; Cite Source Documentation: Project complies with 24 CFR 51.303(a)(3). The review of this factor is completed.


☐ Yes, **Disclosure statement must be provided** to buyer and a copy of the signed disclosure statement must be maintained in this Environmental Review Record [24 CFR 51.303(a)(3)].

Completed by: Sharon Paskewitz
Sharon Paskewitz, Housing Director

Date: 10-21-2022

Completed by: 
Justin Krupa, Team Leader

Date: 10/21/22

Reviewed by: 
Lisabeth Nielssen, Senior Compliance Officer

Date: 10/21/2022