

# **SAMISH INDIAN NATION: DETERMINATION OF EXEMPTION**

NAHASDA Grant Number:

**55IT5313870**

Time period covered by this Environmental Review:

**January 1, 2024 through December 31, 2024**

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, Human Resources Executive Director, Compliance Executive Director, 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?

- ( X ) No; flood insurance is not required. The review of this factor is 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?

( X ) No The review of this factor is 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](http://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?

( X ) No. The review of this factor is 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: \_\_\_\_\_

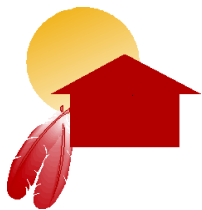
Justin Krupa, Housing Director

Date: 12/16/2024

Completed by: \_\_\_\_\_

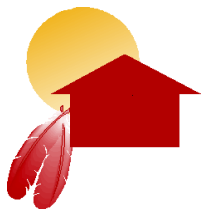
Lisabeth Nielssen, Compliance

Date: 12/16/2024

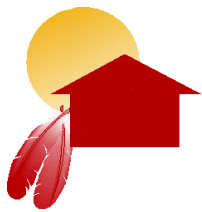


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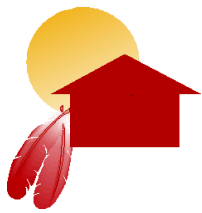
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RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>WP. Pg.</u>	<u>Remarks</u>
<b>I. Purpose</b>				
<p>The purpose of the Indian Housing Plan (IHP) and Annual Performance Report (APR) compliance review is to determine whether the recipient:</p> <ul style="list-style-type: none"> <li>a. Has carried out its eligible activities in a timely manner</li> <li>b. Has carried out its eligible activities and certifications in accordance with the requirements and the primary objective of NAHASDA and other applicable laws</li> <li>c. Has the continuing capacity to carry out those activities in a timely manner</li> <li>d. Has complied with the IHP of the grant beneficiary; and</li> <li>e. Has submitted APRs that are accurate.</li> </ul> <p>NAHASDA Sec. 405 (b)(1)(B) requires HUD to verify the accuracy of information contained in the APR.</p>	<p>NAHASDA Sections 404 and 405 (b)(1)(B)</p> <p>24 CFR 1000.520</p>	<p>HUD-52737</p> <p>NAHASDA Guidance 2004-09</p> <p>PG 2014-11</p>		Read and noted
<b>II. Pre-Visit Preparation</b>				
A. Prior to going on-site, review the most recent IHP, approved IHP amendments, IHP amendments in process, and APR.				Reviewing the 2024 IHP and 2023 APR
<p>B. If available, review the following documents:</p> <ul style="list-style-type: none"> <li>1. Recipient's policies and procedures</li> </ul>	24 CFR 1000.526			Read and noted



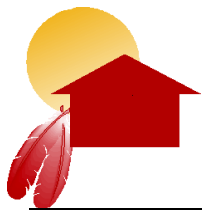
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2. Previous monitoring findings and corrective actions status for findings 3. Previous self-monitoring report(s) 4. Previous 2 CFR Part 200 and OIG audits, work papers and management plan status for findings 5. Previous and current enforcement actions 6. Valid complaints 7. Relevant correspondence				
C. Develop a list of planned activities from the IHP and enter the following data from the APR: 1. Permanent and temporary jobs supported with IHBG funds; 2. Outputs by eligible activity, including: a. Units completed or assisted, and b. Families assisted; and 3. Outcomes by eligible activity.	24 CFR 1000.512(d)			Read and noted
D. Collect HUD and APR data on recipient's Formula Current Assisted Stock (FCAS).				Read and noted
<b>III. On-Site Review</b>				
A. Review the sampling methods in the General Instructions and select a sample of files to review.	24 CFR 1000.503 and .526			



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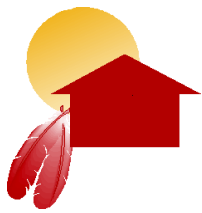
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B. While on site, determine the following for each of the samples selected:	24 CFR1000.524(c)			
1. Actual completion status				2024 IHP - Confirmed submitted on 10/17/2022 2023 APR – Confirmed submitted on 03/28/2024 received confirmation on received confirmation on 05/09/2024. APR needed resubmissions due to SAF425 and APR amounts no matching. Corrections made, posted 06/25/2024, formal acceptance of APR occurred 8/19/2024.
2. Actual expenditures for each activity		See pg 9 in Epic Report – Uses of funding		Program actuals totals in APR and MIP reports for 2023 both show actuals
3. Units completed				N/A in 2020-2024, no construction occurred
4. Households assisted 5. Acres purchased				2023 – 69 households of rental assistance service were provided with financial support per APR, representing 39 TBRA households, 30 prevention OTHER Housing families served un-duplicated.  N/A Acres purchases in 2020-2024



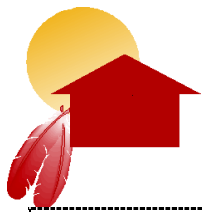
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<p>C. New Activity: Is the recipient conducting an activity not found in a compliant IHP or amended IHP?</p> <p>NOTES: Compare the APR with the approved IHP to determine if an activity has been added.</p> <p>If there is a new activity, the IHP will have to be amended. If the amendment is deemed noncompliant, expenditures will be questioned and may be disallowed.</p>				<p>No new activity; planned IHP and actual APR match.</p> <p>Emergency shelter was not purchased in 2023.</p>
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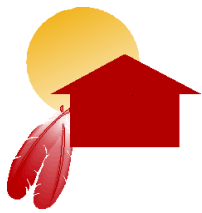
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<b>D. Self-Monitoring</b>  NOTE: This section is covered by the Self-Monitoring Monitoring Plan. If no self-monitoring review will be conducted, then review this section in the IHP/APR review.				
1. Review the self-monitoring plan described in the APR and compare it to the recipient's files to determine accuracy of the:	24 CFR 1000.502			
a. system description				
b. results reported				Results reported to Tribal Council, Government leadership and approved in RS 2022-10-009
c. corrective actions reported				Based on Self-Monitoring reports for 2021, we attached the HUD Inspection form which allows us to do additional inspection for households that have children aged 6 and under living in the home and confirmation of year built.
2. Review notices, minutes, comments, etc to confirm the public accountability details as reported in the APR.				Typically, these are posted for review at HHS Lobby & Admin Lobby for at least 30 days. The program has scanned this reference resource to the Housing Website for public access. Included in the book: - Allocation Est. for program year- IHP, resolution, submission receipt, HUD receipt,



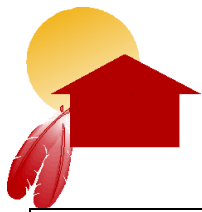
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				HUD Approval- 24 CFR 1000 (Native American Housing Activities)- Samish Housing Policies- Fair market rent amount for year- Area median income rate for year- APR, resolution, submission receipt, HUD receipt, HUD Approval- ERR's for year and per project- Self-Monitoring result report Fair Market Rent and area median income are present in the resource for 2023. No ERRs for 2024
E. Review for Timely Progress				
1. Planned activities of the IHP and APR.				Construction of Affordable Housing; TBRA; Other Housing Services (Homelessness Prevention & Rapid Re-housing); Housing Management; Community Center; Planning & Administration
a. Compare the actual accomplishments of activities in the APR with those planned in the IHP.	24 CFR 1000.520(a)			Yes to TBRA, Other Housing Services, housing management, and Planning & Administration. For TBRA and Prevention goals, 69 of 95 targeted households assisted)



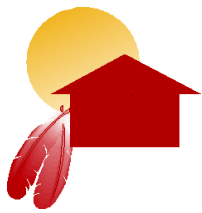
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b. Review the quantitative status of the planned activities.				Reviewed 2024 IHP and 2023 APR for this section: 39 out of 45 planned in 2023 for TBRA to date 30 out of 50 planned in 2023 for HP on Other Housing Services and Housing Management to date 69 out of 95 planned in 2023
c. Determine if the recipient is on schedule.	24 CFR 1000.512(b)(2)			As of December 2024 (2024 IHP numbers): -Development of Emergency Shelter (0/12) – Did not develop in 2024. Will not meet, used other funding for the purchase and development of a 4-plex housing unit in 2023. -TBRA: (39/45) will not meet -Other Housing Support Services: (30/50) will not meet -Housing Management (69/95) will not meet
(1) If an activity is behind schedule, is there a valid reason(s)?				Rental unit costs continue to rise, working in the lowest vacancy rate areas in the Pacific Northwest
d. While on site, compare the results to the reported status.				Will not meet due to reasons mentioned in section c(1) above
e. If the goal was to assist a specific number of low-income families, complete a specific number of units, and/or purchase a specific number of acres, has this been accomplished?				No, purchase of available 4-plex was made. Could not find the appropriate building for sale. No, the number of low-income households assisted was impacted by low vacancy rates and high rental costs reduces the available number of units that fit within NAHASDA guidelines.



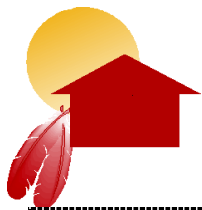
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F. Statement of Needs				
1. Has the estimate for low-income families remained the same?				No it has changed, because we utilized the “Low Income Documentation System” published by HUD annually.
2. If it has changed, explain the overall impact on the IHP.				IHBG Income limits increased in 2023 allowing for the potential of more eligible participants in our program.
3. Has the estimate for all families in the jurisdiction changed? Explain.				No, because we are still using the 2020 Federal Census data



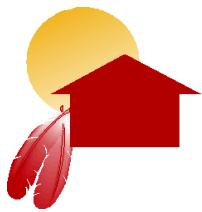
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G. Other Issues to Review				
1. Useful Life and Binding Commitments	Section 205(a)(2) of NAHASDA	Recipient Guidance 2014-09(R)		We utilize what HUD recommendation of useful life and binding commitments.  N/A no useful life nor binding commitments in 2024
a. Does the IHP identify the useful life period that the recipient uses for IHBG-assisted properties?				Yes, in “Other Submission Items” section of IHP/APR
(1) If not, did the IHP include a description of the recipient’s plan or system for determining the useful life of the housing it assists with IHBG funds?				N/A
b. Does the recipient maintain a record of the current, specific useful life for each individual property assisted with IHBG funds?  NOTE: Request a copy of the record of IHBG-assisted properties and ask that the list identify the useful life for each unit.				N/A – no longer have a down payment assistance program. Plan to reactivate for 2025
2. Housing to be Demolished or Disposed	24 CFR 1000.134			N/A for 2024



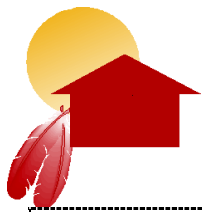
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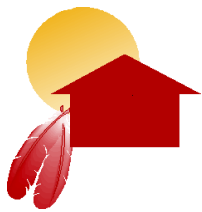
a. Has the recipient demolished or disposed of any housing, as stated in its IHP?				N/A for 2024
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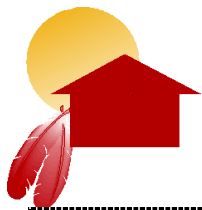
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3. Financial Resources				
a. Did the recipient have available the financial resources stated in the IHP?				Yes, although the estimates made for carryover funding changes, but actuals were reflected in APR.
b. Did the recipient use these resources?				Not all of them, but all unused funding will be carried into the next program year to be used toward meeting program goals. As an investment tribe, we drew down the entirety of IHBG 2024 funding into an investment account.
c. Explain.				Carried-over funding from previous years has been earmarked for the acquisition of emergency housing in 2025.
4. Affordable Housing Resources				
a. Has recipient taken specific actions to address the identified needs?				Yes, the program utilizes a “Turn-Away Report” completed monthly to identify the needs they could not meet
b. Explain				In 2023 Housing Department added to the intake process to track unaccompanied youth 13-17 and veterans. In 2024 we further made changes to admission and occupancy and lost and re-hired Quality and Performance Specialist who will be reviewing and making any needed changes for 2025.



5. Local Cooperation Agreements	Section 101(c) of NAHASDA			
a. Has the recipient entered into a Local Cooperation Agreement with the governing body of the jurisdiction where rental or lease-purchase homeownership units are located and owned by the recipient and developed under NAHASDA or the 1937 Act?				In general, the Tribe has agreements in place with both the City of Anacortes and with Skagit County to provide fire, emergency and Police services to all Tribal Trust lands; However, the Xwch'angteng Housing Development is being developed on Fee Simple land owned by the Tribe, and thus the City and County are already obligated to provide these services.



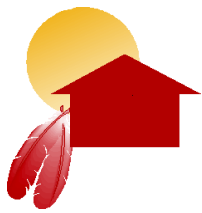
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b. Does the Agreement provide for local cooperation, tax-exemption of the units and the annual payments of user fees or payments in lieu of taxes to compensate such governments for the costs of providing governmental services (i.e., including police and fire protection, roads, water and sewerage systems, utilities systems and related facilities)?				No, because the units are fee simple and not on trust property; However, an agreement will be put in place if/when the property is put into trust and comes under the jurisdiction of the Tribe.
6. FCAS Validation				N/A 2024  <i>NOTE: The Formula Current Assisted Stock (FCAS) component reflects housing developed under the United States Housing Act (the predecessor of the IHBG program) which is owned and/or operated by the IHBG recipient and provides funds for ongoing operation of the housing</i>
a. Compare the recipient's actual FCAS documentation with:				N/A 2024
(1) the unit count as shown in the APR and				N/A 2024
b. Discuss any discrepancies in FCAS unit counts with Supervisor.				N/A 2024



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7.	Has the recipient coordinated the implementation of NAHASDA activities with other government agencies?				Yes, we have coordinated with the State's DSHS, with WorkSource under Dept of Labor, and with Housing Services departments for all 10 Counties in our service area. We are part of Skagit, Whatcom, and Island Co. coordinated entry system as well.
8.	Has the recipient initiated partnerships and/or contracts with welfare agencies?				<p>Yes, Partnerships are in place without formal contracts with welfare agencies serving our 10 county services area.</p> <p>In 2024 The Housing department built relations with Volunteers of America Western Washington (who now hold the coordinated entry for Skagit County).</p>



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a. If yes, explain.				Tribe in general has formal MOAs in place with WA DSHS and its affiliates and has also expanded relationships with private not-for-profit welfare organizations.
<b>IV. Summary</b>				
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.				2024 IHP and 2023 APR were both approved and accepted and found to be in compliance.  2023 APR required several resubmissions due to numbers between SF425 and APR not aligning. Grants Evaluation Specialist for NW ONAP worked with Samish to align numbers and provided training on process.

<b>Reviewer Names:</b>	Justin Krupa Housing Director	
	Lisabeth Nielssen Compliance Executive Director	
<b>Review Date(s):</b>	12/09/2024	

## **SAMISH INDIAN NATION:**

## **DETERMINATION OF EXEMPTION**

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

We may conduct this activity during the course of 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?

( X ) No; flood insurance is not required. The review of this factor is 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.)

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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**

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- flood insurance for new or substantially improved structures;
- erosion control or stabilization of inlet, shoreline or inshore areas?

( X ) No The review of this factor is completed.

( ) Yes; continue.

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

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3. Is the project located in a coastal barrier resource designated on a FEMA map? (See

[www.fema.gov/nfip/cobra.shtm](http://www.fema.gov/nfip/cobra.shtm)).

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

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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: \_\_\_\_\_

  
Justin Krupa, Housing Director

Date: \_\_\_\_\_

12/16/2024

Completed by: \_\_\_\_\_

  
Lisabeth Nielssen, Compliance

Date: 12/16/2024

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## **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).**

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( ) 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](http://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?

( X ) No. The review of this factor is 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)].

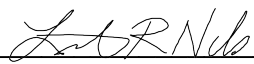
Completed by: \_\_\_\_\_

  
Justin Krupa, Housing Director

Date: \_\_\_\_\_

12/16/2024

Completed by: \_\_\_\_\_

  
Lisabeth Nielssen, Compliance

Date: 12/16/2024

# **SAMISH INDIAN NATION: DETERMINATION OF EXEMPTION**

NAHASDA Grant Number:

**55IT5313870**

Time period covered by this Environmental Review:

**January 1, 2024 through December 31, 2024**

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 program participants. 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?

( X ) No; flood insurance is not required. The review of this factor is 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?

( X ) No The review of this factor is 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](http://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?

( X ) No. The review of this factor is 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?

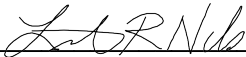
( ) No; Cite Source Documentation:

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:   
 Justin Krupa, Housing Director

Date: 12/16/2024

Completed by:   
 Lisabeth Nielssen, Compliance

Date: 12/16/2024

# **SAMISH INDIAN NATION: DETERMINATION OF EXEMPTION**

NAHASDA Grant Number:

**55IT5313870**

Time period covered by this Environmental Review:

**January 1, 2024 through December 31, 2024**

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?

( X ) No; flood insurance is not required. The review of this factor is 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?

( X ) No The review of this factor is 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](http://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?

( X ) No. The review of this factor is 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?

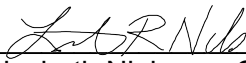
( ) No; Cite Source Documentation:

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:  \_\_\_\_\_  
Justin Krupa, Housing Director

Date: 12/16/24

Completed by:  \_\_\_\_\_  
Lisabeth Nielssen, Compliance

Date: 12/16/2024

## **SAMISH INDIAN NATION:**

## **DETERMINATION OF EXEMPTION**

NAHASDA Grant Number:

**55IT5313870**

Time period covered by this Environmental Review:

**January 1, 2024 through December 31, 2024**

Project Name / Description:

**SAMISH NAHASDA: SUPPORTIVE SERVICES - SECURITY DEPOSIT, FIRST & LAST (0017)**

The program provides Samish families with help securing affordable rental housing units or apartments by offering security deposits, and first and last month's rent. 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)(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?

- ( X ) No; flood insurance is not required. The review of this factor is 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?

( X ) No The review of this factor is 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](http://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?

( X ) No. The review of this factor is 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:   
Justin Krupa, Housing Director

Date: 12/16/2024

Completed by:   
Lisabeth Nielssen, Compliance

Date: 12/16/2024

# **SAMISH INDIAN NATION: DETERMINATION OF EXEMPTION**

NAHASDA Grant Number:

**55IT5313870**

Time period covered by this Environmental Review:

**January 1, 2024 through December 31, 2024**

Project Name / Description:

**SAMISH NAHASDA: Supportive Services - Other Housing Services (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 members. Topics could include technology use; employment, financial 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 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?

( X ) No; flood insurance is not required. The review of this factor is 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?

( X ) No The review of this factor is 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](http://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?

( X ) No. The review of this factor is 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?

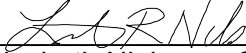
( ) No; Cite Source Documentation:

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:   
Justin Krupa, Housing Director

Date: 12/16/24

Completed by:   
Lisabeth Nielssen, Compliance

Date: 12/16/2024

# **SAMISH INDIAN NATION:**

# **DETERMINATION OF EXEMPTION**

NAHASDA Grant Number:

**55IT5313870**

Time period covered by this Environmental Review:

**January 1, 2024 through December 31, 2024**

Project Name / Description:

**SAMISH NAHASDA: TECHNICAL ASSISTANCE (SUB0019/0001) & TRAINING (SUB0019/0001)**

We may conduct this activity to ensure our program is being run efficiently, accurately, and remains in compliance with all required statutory and regulatory requirements. This activity results in no human environmental impact.

**This project is determined to be Exempt according to:                      24CFR §58.34(a)(9)**

## **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?

- ( X ) No; flood insurance is not required. The review of this factor is 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?

( X ) No The review of this factor is 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](http://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?

( X ) No. The review of this factor is 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: \_\_\_\_\_

Justin Krupa, Housing Director

Date: 12/16/24

Completed by: Lisabeth Nielssen

Lisabeth Nielssen, Compliance

Date: 12/16/2024

# **SAMISH INDIAN NATION:**

# **DETERMINATION OF EXEMPTION**

NAHASDA Grant Number:

**55IT5313870**

Time period covered by this Environmental Review:

**January 1, 2024 through December 31, 2024**

Project Name / Description:

## **SAMISH NAHASDA: TENANT 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 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?

( X ) No; flood insurance is not required. The review of this factor is 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?

( X ) No The review of this factor is 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.shtml](http://www.fema.gov/nfip/cobra.shtml)).

( ) 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?

( X ) No. The review of this factor is 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: \_\_\_\_\_

  
Justin Krupa, Housing Director

Date: 12/17/24

Completed by: Lisabeth Nielssen

Lisabeth Nielssen, Compliance

Date: 12/16/2024

# **SAMISH INDIAN NATION: DETERMINATION OF EXEMPTION**

NAHASDA Grant Number:

**55IT5313870**

Time period covered by this Environmental Review:

**January 1, 2024 through December 31, 2024**

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?

( X ) No; flood insurance is not required. The review of this factor is 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?

( X ) No The review of this factor is 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](http://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?

( X ) No. The review of this factor is 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: \_\_\_\_\_

Justin Krupa, Housing Director

Date: 12/17/24

Completed by: \_\_\_\_\_

Lisabeth Nielssen, Compliance

Date: 12/16/2024