

# Proposer's Background Information Form

#	Question	Response	Comment	Status
<b>Contact Information</b>				
1.1.1	Primary Contact: Please provide the contact information (Name, Title, E-mail and Phone Number) for the Primary Contact for this project.	Martin Larsen, President/CEO 954-609-2677 bossca1@earthlink.net		Complete
1.1.2	Authorized Approver: Please provide the contact information (Name, Title, E-mail and Phone Number) for the Authorized Approver for this project.	Martin Larsen, President/CEO 954-609-2677 bossca1@earthlink.net		Complete
<b>Organization Background</b>				
1.2.1	Please state the year that you company started its business.	1990		Complete
1.2.2	Please state the year that your company started providing service under your current business name.	1990		Complete
1.2.3	What State is your Company Registered In?	FL		Complete
<b>Former Business</b>				
1.3.1	Under what former name has your business operated? Include a description of the business.	None		Complete
1.3.2	At what address was that business located?	NA		Complete
<b>Past Failure</b>				
1.4.1	Have you ever failed to complete work awarded to you. If so, when, where and why?	No		Complete
<b>Inspected</b>				
1.5.1	Have you personally inspected the proposed WORK and do you have a complete plan for its performance?	Yes		Complete
<b>Subcontracting</b>				
1.6.1	Will you subcontract any part of this WORK? If you will be subcontracting any part of this work, provide details including a list of each sub-contractor(s) that will perform work in excess of ten percent (10%) of the contract amount and the work that will be performed by each subcontractor(s). (Note: The proposed list of subcontractor(s) may not be amended after award of the contract without the prior written approval of the Contract Administrator, whose approval shall not be reasonably withheld.)	No		Complete
<b>Bankruptcy Petitions</b>				
1.7.1	List and describe all bankruptcy petitions (voluntary or involuntary) which have been filed by or against the Proposer, its parent or subsidiaries or predecessor organizations during the past five (5) years. Include in the description the disposition of each such petition.	None		Complete
<b>Bond Claims</b>				
1.8.1	List and describe all successful Bond claims made to your surety(ies) during the last five (5) years. The list and descriptions should include claims against the bond of the Proposer and its predecessor organization(s).	None		Complete
<b>Claims, Arbitrations, Administrative Hearings and Lawsuits</b>				

1.9.1	List all claims, arbitrations, administrative hearings and lawsuits brought by or against the Proposer or its predecessor organizations(s) during the last (10) years. The list shall include all case names; case, arbitration or hearing identification numbers; the name of the project over which the dispute arose; and a description of the subject matter of the dispute.	None		Complete
<b>Criminal Proceedings or Hearings</b>				
1.10.1	List and describe all criminal proceedings or hearings concerning business related offenses in which the Proposer, its principals or officers or predecessor organization(s) were defendants.	None		Complete
<b>Company Classification</b>				
1.11.1	In regards to the commodities/services proposed, which of the following best classifies your firm? If you selected any options besides "Original Provider" please explain.	Original Provider		Complete
<b>Debarment/Suspension</b>				
1.12.1	Have you ever been debarred or suspended from doing business with any governmental agency? If you have been debarred or suspended from doing business with any governmental agency, please explain.	No		Complete
<b>Similar Experience &amp; Contracts</b>				
1.13.1	Describe the firm's local experience/nature of service with contracts of similar size and complexity, in the previous three (3) years.	Current provider to the City of Pembroke Pines	Community Redevelopment has worked for the City of Pembroke Pines for more than 25 years.	Complete
<b>Professional License Information</b>				
1.14.1	Are professional licenses required to perform the services requested in this solicitation? If so, please list any applicable professional licenses that your company has that are required to provide these services.	Not Applicable	Community Redevelopment is a licensed Real Estate Brokerage, giving it legal standing to review real estate contracts related to First - time Homebuyers programs	Complete
<b>Conflict of Interest</b>				
1.15.1	Do you need to disclose any conflicts of interest? The award of any contract hereunder is subject to the provisions of Chapter 112, Florida Statutes. Proposers must disclose with their Proposal the name of any officer, director, partner, proprietor, associate or agent who is also an officer or employee of CITY or any of its agencies. Further, all Proposers must disclose the name of any officer or employee of CITY who owns, directly or indirectly, an interest of five percent (5%) or more in the Proposer 's firm or any of its branches or affiliate companies.	No		Complete
<b>19 Questions</b>		<b>100.00% Complete</b>		



joint venture with a person who has been convicted of a public entity crime in Florida during the preceding 36 months shall be considered an affiliate.

6. I understand that a "person" as defined in Paragraph 287.133(1)(e), Florida Statutes, means any natural person or any entity organized under the laws of any state or of the United States with the legal power to enter into a binding contract and which bids or applies to bid on contracts let by a public entity, or which otherwise transacts or applies to transact business with a public entity, or which otherwise transacts or applies to transact business with a public entity. The term "person" includes those officers, directors, executives, partners, shareholders, employees, members, and agents who are active in management of an entity.

7. Based on information and belief, the statement which I have marked below is true in relation to the entity submitting this sworn statement. **(Please indicate which statement applies.)**

A) Neither the entity submitting this sworn statement, nor any officers, directors, executives, partners, shareholders, employees, members, or agents who are active in management of the entity, nor any affiliate of the entity have been charged with and convicted of a public entity crime subsequent to July 1, 1989.

B) The entity submitting this sworn statement, or one or more of the officers, directors, executives, partners, shareholders, employees, members, or agents who are active in management of the entity, or an affiliate of the entity has been charged with and convicted of a public entity crime subsequent to July 1, 1989, AND **(Please indicate which additional statement applies.)**

B1) There has been a proceeding concerning the conviction before a hearing officer of the State of Florida, Division of Administrative Hearings. The final order entered by the hearing officer did not place the person or affiliate on the convicted vendor list. **(Please attach a copy of the final order.)**

B2) The person or affiliate was placed on the convicted vendor list. There has been a subsequent proceeding before a hearing officer of the State of Florida, Division of Administrative Hearings. The final order entered by the hearing officer determined that it was in the public interest to remove the person or affiliate from the convicted vendor list. **(Please attach a copy of the final order.)**

B3) The person or affiliate has not been placed on the convicted vendor list. **(Please describe any action taken by or pending with the Department of General Services.)**

  
Bidder's Name/Signature

Community Redevelopment Associates  
Company

11/10/25  
Date



## EQUAL BENEFITS CERTIFICATION FORM FOR DOMESTIC PARTNERS AND ALL MARRIED COUPLES

Except where federal or state law mandates to the contrary, a Contractor awarded a Contract pursuant to a competitive solicitation shall provide benefits to Domestic Partners and spouses of its employees, irrespective of gender, on the same basis as it provides benefits to employees' spouses in traditional marriages.

The Contractor shall provide the City and/or the City Manager or his/her designee, access to its records for the purpose of audits and/or investigations to ascertain compliance with the provisions of this section, and upon request shall provide evidence that the Contractor is in compliance with the provisions of this section upon each new bid, contract renewal, or when the City Manager has received a complaint or has reason to believe the Contractor may not be in compliance with the provisions of this section. Records shall include but not be limited to providing the City and/or the City Manager or his/her designee with certified copies of the Contractor's records pertaining to its benefits policies and its employment policies and practices.

The Contractor must conspicuously make available to all employees and applicants for employment the following statement:

**"During the performance of a contract with the City of Pembroke Pines, Florida, the Contractor will provide Equal Benefits to its employees with spouses, as defined by Section 35.39 of the City's Code of Ordinances, and its employees with Domestic Partners and all Married Couples".**

The posted statement must also include a City contact telephone number and email address which will be provided to each contractor when a covered contract is executed.

### SECTION 1 DEFINITIONS

1. **Benefits** means the following plan, program or policy provided or offered by a contractor to its employees as part of the employer's total compensation package which may include but is not limited to sick leave, bereavement leave, family medical leave, and health benefits.
2. **Cash Equivalent** mean the amount of money paid to an employee with a domestic partner or spouse in lieu of providing benefits to the employee's domestic partner or spouse. The cash equivalent is equal to the employer's direct expense of providing benefits to an employee for his or her spouse from a traditional marriage.
3. **Covered Contract** means a contract between the City and a contractor awarded subsequent to the date when this section becomes effective valued at over \$25,000 or the threshold amount required for competitive bids as required in section 35.18(A) of the Procurement Code.
4. **Domestic Partner** shall mean any two (2) adults of the same or different sex who have registered as domestic partners with a governmental body pursuant to state or local law authorizing such registration, or with an internal registry maintained by the employer of at



least one of the domestic partners. A contractor may institute an internal registry to allow for the provision of equal benefits to employees with domestic partners who do not register their partnerships pursuant to a governmental body authorizing such registration, or who are located in a jurisdiction where no such governmental domestic partnership registry exists. A contractor that institutes such registry shall not impose criteria for registration that are more stringent than those required for domestic partnership registration by the City of Pembroke Pines.

5. **Equal benefits** means the equality of benefits between employees with spouses and/or dependents of spouses and employees with domestic partners and/or dependents of domestic partners, and/or between spouses of employees and/or dependents of spouses and domestic partners of employees and/or dependents of domestic partners.
6. **Spouse** means one member of a married pair legally married under the laws of any state within the United States of America or any other jurisdiction under which such marriage is legally recognized, irrespective of gender.
7. **Traditional marriage** means a marriage between one man and one woman.

## SECTION 2 CERTIFICATION OF CONTRACTOR

The firm providing a response, by virtue of the signature below, certifies that it is aware of the requirements of Section 35.39 "City Contractors providing Equal Benefits for Domestic Partners and all Married Couples" of the City's Code of Ordinances, and certifies the following (**Check only one box below**):

- A. Contractor currently complies with the requirements of this section; or
- B. Contractor will comply with the conditions of this section at the time of contract award; or
- C. Contractor will not comply with the conditions of this section at the time of contract award:  
or
- D. Contractor does not comply with the conditions of this section because of the following allowable exemption (**Check only one box below**):
1. The Contractor does not provide benefits to employees' spouses in traditional marriages;
2. The Contractor provides an employee the cash equivalent of benefits because the Contractor is unable to provide benefits to employees' Domestic Partners or spouses despite making reasonable efforts to provide them. To meet this exception, the Contractor shall provide a notarized affidavit that it has made reasonable efforts to provide such benefits. The affidavit shall state the efforts taken to provide such benefits and the amount of the cash equivalent. Cash equivalent means the amount of money paid to an employee with a Domestic Partner or spouse rather than providing benefits to the employee's Domestic Partner or spouse. The cash equivalent is equal to the employer's direct expense of providing benefits to an employee's spouse;



City of Pembroke Pines

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3. The Contractor is a religious organization, association, society, or any non-profit charitable or educational institution or organization operated supervised or controlled by or in conjunction with a religious organization, association, or society;

4. The Contractor is a governmental agency;

**The certification shall be signed by an authorized officer of the Contractor. Failure to provide such certification (by checking the appropriate boxes above along with completing the information below) shall result in a Contractor being deemed non-responsive.**

COMPANY NAME: Community Redevelopment Associates of Florida Inc.

AUTHORIZED OFFICER NAME / SIGNATURE: \_\_\_\_\_

A handwritten signature in blue ink, appearing to read "M. Larsen", written over a horizontal line.

Martin Larsen President/CEO



## VENDOR DRUG-FREE WORKPLACE CERTIFICATION FORM

### SECTION 1 GENERAL TERM

Preference may be given to vendors submitting a certification with their bid/proposal certifying they have a drug-free workplace in accordance with Section 287.087, Florida Statutes. This requirement affects all public entities of the State and becomes effective January 1, 1991. The special condition is as follows:

**IDENTICAL TIE BIDS** - Preference may be given to businesses with drug-free workplace programs. Whenever two or more bids that are equal with respect to price, quality, and service are received by the State or by any political subdivision for the procurement of commodities or contractual services, a bid received from a business that certifies that it has implemented a drugfree workplace program shall be given preference in the award process. Established procedures for processing tie bids will be followed if none of the tied vendors have a drug-free workplace program. In order to have a drug-free workplace program, a business shall:

1. Publish a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the workplace and specifying the actions that will be taken against employees for violations of such prohibition.
2. Inform employees about the dangers of drug abuse in the workplace, the business's policy of maintaining a drug-free workplace, any available drug counseling, rehabilitation, and employee assistance programs, and the penalties that may be imposed upon employees for drug abuse violations.
3. Give each employee engaged in providing the commodities or contractual services that are under bid a copy of the statement specified in subsection (1).
4. In the statement specified in subsection (1), notify the employees that, as a condition of working on the commodities or contractual services that are under bid, the employee will abide by the terms of the statement and will notify the employer of any conviction of, or plea of guilty or nolo contendere to, any violation of chapter 893 or of any controlled substance law of the United States or any state, for a violation occurring in the workplace no later than five (5) days after each conviction.
5. Impose a sanction on, or require the satisfactory participation in a drug abuse assistance or rehabilitation program if such is available in the employee's community, by any employee who is so convicted.
6. Make a good faith effort to continue to maintain a drug-free workplace through implementation of this section.

### SECTION 2 AFFIRMATION

Place a check mark here only if affirming bidder **complies fully** with the above requirements for a Drug-Free Workplace.

Place a check mark here only if affirming bidder **does not** meet the requirements for a Drug-Free Workplace.

**Failure to complete this certification at this time (by checking either of the boxes above) shall render the vendor ineligible for Drug-Free Workplace Preference. This form must be completed by/for the proposer; the proposer WILL NOT qualify for Drug-Free Workplace Preference based on their sub-contractors' qualifications.**

Authorized Signature

Martin Larsen

Authorized Signer Name

Community Redevelopment Assc.

Company Name



City of Pembroke Pines

**NON-COLLUSIVE AFFIDAVIT**

BIDDER is the

Officer

\_\_\_\_\_  
(Owner, Partner, Officer, Representative or Agent)

BIDDER is fully informed respecting the preparation and contents of the attached Bid and of all pertinent circumstances respecting such Bid;

Such Bid is genuine and is not a collusive or sham Bid;

Neither the said BIDDER nor any of its officers, partners, owners, agents, representative, employees or parties in interest, including this affidavit, have in any way colluded, conspired, connived or agreed, directly or indirectly, with any other BIDDER, firm or person to submit a collusive or sham Bid in connection with the Contract for which the attached Bid has been submitted; or to refrain from bidding in connection with such Contract; or have in any manner, directly or indirectly, sought by agreement or collusion, or communications, or conference with any BIDDER, firm, or person to fix the price or prices in the attached Bid or any other BIDDER, or to fix any overhead, profit, or cost element of the Bid Price or the Bid Price of any other BIDDER, or to secure through any collusion conspiracy, connivance, or unlawful agreement any advantage against (Recipient), or any person interested in the proposed Contract;

The price of items quoted in the attached Bid are fair and proper and are not tainted by collusion, conspiracy, connivance, or unlawful agreement on the part of the BIDDER or any other of its agents, representatives, owners, employees or parties in interest, including this affidavit.

Martin Larsen

Printed Name/Signature

Title

President/CEO

Name of Company

Community Redevelopment Associates of FL



City of Pembroke Pines

**SCRUTINIZED COMPANY CERTIFICATION  
PURSUANT TO FLORIDA STATUTE § 287.135.**

I, Martin Larsen President/CEO, on behalf of Community Redevelopment Associates of FL  
Print Name and Title Company Name

certify that Community Redevelopment Associates of FL :  
Company Name

1. Does not participate in a boycott of Israel; and
2. Is not on the Scrutinized Companies that Boycott Israel list; and
3. Is not on the Scrutinized Companies with Activities in Sudan List; and
4. Is not on the Scrutinized Companies with Activities in the Iran Petroleum Energy Sector List; and
5. Has not engaged in business operations in Syria.

Submitting a false certification shall be deemed a material breach of contract. The City shall provide notice, in writing, to the Contractor of the City's determination concerning the false certification. The Contractor shall have ninety (90) days following receipt of the notice to respond in writing and demonstrate that the determination of false certification was made in error. If the Contractor does not demonstrate that the City's determination of false certification was made in error then the City shall have the right to terminate the contract and seek civil remedies pursuant to Florida Statute § 287.135.

Section 287.135, Florida Statutes, prohibits the City from: 1) Contracting with companies for goods or services in any amount if at the time of bidding on, submitting a proposal for, or entering into or renewing a contract if the company is on the Scrutinized Companies that Boycott Israel List, created pursuant to Section 215.4725, F.S. or is engaged in a boycott of Israel; and 2) Contracting with companies, for goods or services over \$1,000,000.00 that are on either the Scrutinized Companies with activities in the Iran Petroleum Energy Sector list, created pursuant to s. 215.473, or are engaged in business operations in Syria.

As the person authorized to sign on behalf of the Contractor, I hereby certify that the company identified above in the section entitled "Contractor Name" does not participate in any boycott of Israel, is not listed on the Scrutinized Companies that Boycott Israel List, is not listed on either the Scrutinized Companies with activities in the Iran Petroleum Energy Sector List, and is not engaged in business operations in Syria. I understand that pursuant to section 287.135, Florida Statutes, the submission of a false certification may subject the company to civil penalties, attorney's fees, and/or costs. I further understand that any contract with the City for goods or services may be terminated at the option of the City if the company is found to have submitted a false certification or has been placed on the Scrutinized Companies with Activities in Sudan list or the Scrutinized Companies with Activities in the Iran Petroleum Energy Sector List.

Community Redevelopment Associates  
Company Name

Martin Larsen  
Print Name / Signature

President/CEO  
Title

Martin Larsen President /CEO



### E-VERIFY SYSTEM CERTIFICATION STATEMENT (UNDER SECTION 448.095, FLORIDA STATUTES)

1. Definitions:
  - a. **“Contractor”** means a person or entity that has entered or is attempting to enter into a contract with a public employer to provide labor, supplies, or services to such employer in exchange for salary, wages, or other remuneration. “Contractor” includes, but is not limited to, a vendor or consultant.
  - b. **“Subcontractor”** means a person or entity that provides labor, supplies, or services to or for a contractor or another subcontractor in exchange for salary, wages, or other remuneration.
  - c. **“E-Verify system”** means an Internet-based system operated by the United States Department of Homeland Security that allows participating employers to electronically verify the employment eligibility of newly hired employees.
  
2. Effective January 1, 2021, Contractors, shall register with and use the E-verify system in order to verify the work authorization status of all newly hired employees. Contractor shall register for and utilize the U.S. Department of Homeland Security’s E-Verify System to verify the employment eligibility of:
  - a. All persons employed by a Contractor to perform employment duties within Florida during the term of the contract; and
  - b. All persons (including subvendors/subconsultants/subcontractors) assigned by Contractor to perform work pursuant to the contract with the City of Pembroke Pines. The Contractor acknowledges and agrees that registration and use of the U.S. Department of Homeland Security’s E-Verify System during the term of the contract is a condition of the contract with the City of Pembroke Pines; and
  - c. Should vendor become the successful Contractor awarded for the above-named project, by entering into the contract, the Contractor shall comply with the provisions of Section 448.095, Fla. Stat., “Employment Eligibility,” as amended from time to time. This includes, but is not limited to registration and utilization of the E-Verify System to verify the work authorization status of all newly hired employees. Contractor shall also require all subcontractors to provide an affidavit attesting that the subcontractor does not employ, contract with, or subcontract with, an unauthorized alien. The Contractor shall maintain a copy of such affidavit for the duration of the contract.
  
3. Contract Termination
  - a. If the City has a good faith belief that a person or entity with which it is contracting has knowingly violated s. 448.09 (1) Fla. Stat., the contract shall be terminated.
  - b. If the City has a good faith belief that a subcontractor knowingly violated s. 448.095 (2), but the Contractor otherwise complied with s. 448.095 (2) Fla. Stat., shall promptly notify the Contractor and order the Contractor to immediately terminate the contract with the subcontractor.
  - c. A contract terminated under subparagraph a) or b) is not a breach of contract and may not be considered as such.
  - d. Any challenge to termination under this provision must be filed in the Circuit Court no later than 20 calendar days after the date of termination.
  - e. If the contract is terminated for a violation of the statute by the Contractor, the Contractor may not be awarded a public contract for a period of 1 year after the date of termination.

Community Redevelopment Associates of Florida Inc.

COMPANY NAME: \_\_\_\_\_

PRINTED NAME / AUTHORIZED SIGNATURE: \_\_\_\_\_

Martin Larsen President/CEO



City of Pembroke Pines

**AFFIDAVIT OF COMPLIANCE WITH HUMAN TRAFFICKING LAWS**

In accordance with section 787.06 (13), Florida Statutes, the undersigned, on behalf of the entity listed below ("Entity"), hereby attests under penalty of perjury that:

1. The Affiant is an officer or representative of the Entity entering into an agreement with the City of Pembroke Pines.

2. The Entity does not use coercion for labor or services as defined in Section 787.06, Florida Statutes, entitled "Human Trafficking".

3. The Affiant is authorized to execute this Affidavit on behalf of the Entity.

4. I understand that I am swearing or affirming under oath to the truthfulness of the claims made in this affidavit and that the punishment for knowingly making a false statement includes fines and/or imprisonment.

5. Pursuant to Sec. 92.525(2), Fla. Stat., under penalties of perjury, I declare that I have read the foregoing affidavit of compliance with Human Trafficking Laws and that the facts stated in it are true.

FURTHER AFFIANT SAYETH NAUGHT.

DATE: 11/10/25

SIGNATURE: 

ENTITY: Community Redevelopment Associates of FI

NAME: Martin Larsen

TITLE: President/CEO



City of Pembroke Pines

(OFFICE USE ONLY) Vendor # \_\_\_\_\_

**VENDOR INFORMATION FORM**

MAIN CONTACT INFORMATION			
<b>Company Name (Legal Name as filed with IRS)</b>	Community Redevelopment Associates of FL		
<b>Doing Business As (DBA)</b>			
<b>Primary Business Address</b>	8569 Pines Blvd.		
	Ste. 201		
	<b>City:</b>	Pembroke Pines	
	<b>State:</b>	FL	<b>Zip:</b> 33024
	<b>Country:</b>	USA	
<b>Remit To Address</b>	8569 Pines Blvd.		
	Ste. 201		
	<b>City:</b>	Pembroke Pines	
	<b>State:</b>	FL	<b>Zip:</b> 33024
	<b>Country:</b>	USA	
<b>Order From Address</b>	8569 Pines Blvd.		
	Ste. 201		
	<b>City:</b>	Pembroke Pines	
	<b>State:</b>	FL	<b>Zip:</b> 33024
	<b>Country:</b>	USA	
<b>Foreign Entity (Yes/No)</b>	No		
<b>Telephone Number</b>	954-431-3559		
<b>Primary Company E-mail</b>	bosscat1@earthlink.net		
<b>Fax</b>	954-431-6882		
<b>Website</b>	www.crafla.com		
<b>DUNS</b>			
<b>Independent Contractor (Yes/No)</b>	No		
<b>Identification Number</b>	<b>SSN:</b>		<b>FID:</b> 65-0216617

GENERAL PAYMENT TERMS		
<b>Discount Percent</b> Defines the discount percentage the vendor extends to your organization.	<b>Days to Discount</b> Number of days which payment must be received to claim the discount percent.	<b>Days to Net</b> Number of days that the vendor allows before requiring net payment.

CONTACT # 1	
<b>Contact Name (First &amp; Last Name)</b>	Martin Larsen
<b>Description/Title/Position</b>	President/CEO
<b>Phone (Voice)</b>	954-609-2677
<b>Phone (Text)</b>	954-609-2677 <b>Opt In (Y/N):</b> Y
<b>Fax</b>	954-431-6882
<b>E-mail</b>	bosscat1@earthlink.net

STATE REGISTRATION	
<b>Is your company registered with the State of Florida? (Y/N)</b>	Y
<b>If not, what state is your company registered in?</b>	

Please attach the print out from <https://dos.myflorida.com/sunbiz/> or the appropriate state showing your active registration and any applicable fictitious names that are registered.

Form **W-9**  
(Rev. March 2024)  
Department of the Treasury  
Internal Revenue Service

# request for Taxpayer Identification Number and Certification

Go to [www.irs.gov/FormW9](http://www.irs.gov/FormW9) for instructions and the latest information.

Give form to the  
requester. Do not  
send to the IRS.

**Before you begin.** For guidance related to the purpose of Form W-9, see *Purpose of Form*, below.

Print or type.  
See Specific Instructions on page 3.

**1** Name of entity/individual. An entry is required. (For a sole proprietor or disregarded entity, enter the owner's name on line 1, and enter the business/disregarded entity's name on line 2.)

**Community Redevelopment Associates of Florida Inc.**

**2** Business name/disregarded entity name, if different from above.

**3a** Check the appropriate box for federal tax classification of the entity/individual whose name is entered on line 1. Check only **one** of the following seven boxes.

- Individual/sole proprietor
- C corporation
- S corporation
- Partnership
- Trust/estate
- LLC. Enter the tax classification (C = C corporation, S = S corporation, P = Partnership) . . . . .
- Other (see instructions)

**Note:** Check the "LLC" box above and, in the entry space, enter the appropriate code (C, S, or P) for the tax classification of the LLC, unless it is a disregarded entity. A disregarded entity should instead check the appropriate box for the tax classification of its owner.

**4** Exemptions (codes apply only to certain entities, not individuals; see instructions on page 3):

Exempt payee code (if any) **5**  
Exemption from Foreign Account Tax Compliance Act (FATCA) reporting code (if any) **5**

(Applies to accounts maintained outside the United States.)

**3b** If on line 3a you checked "Partnership" or "Trust/estate," or checked "LLC" and entered "P" as its tax classification, and you are providing this form to a partnership, trust, or estate in which you have an ownership interest, check this box if you have any foreign partners, owners, or beneficiaries. See instructions . . . . .

**5** Address (number, street, and apt. or suite no.). See instructions.

**8569 Pines Blvd. Ste. 201**

Requester's name and address (optional)

**6** City, state, and ZIP code

**Pembroke Pines FL 3302**

**7** List account number(s) here (optional)

## Part I Taxpayer Identification Number (TIN)

Enter your TIN in the appropriate box. The TIN provided must match the name given on line 1 to avoid backup withholding. For individuals, this is generally your social security number (SSN). However, for a resident alien, sole proprietor, or disregarded entity, see the instructions for Part I, later. For other entities, it is your employer identification number (EIN). If you do not have a number, see *How to get a TIN*, later.

Social security number								
			-					

OR

Employer identification number									
6	5	-	0	2	1	6	6	1	7

**Note:** If the account is in more than one name, see the instructions for line 1. See also *What Name and Number To Give the Requester* for guidelines on whose number to enter.

## Part II Certification

Under penalties of perjury, I certify that:

- The number shown on this form is my correct taxpayer identification number (or I am waiting for a number to be issued to me); and
- I am not subject to backup withholding because (a) I am exempt from backup withholding, or (b) I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me that I am no longer subject to backup withholding; and
- I am a U.S. citizen or other U.S. person (defined below); and
- The FATCA code(s) entered on this form (if any) indicating that I am exempt from FATCA reporting is correct.

**Certification instructions.** You must cross out item 2 above if you have been notified by the IRS that you are currently subject to backup withholding because you have failed to report all interest and dividends on your tax return. For real estate transactions, item 2 does not apply. For mortgage interest paid, acquisition or abandonment of secured property, cancellation of debt, contributions to an individual retirement arrangement (IRA), and, generally, payments other than interest and dividends, you are not required to sign the certification, but you must provide your correct TIN. See the instructions for Part II, later.

**Sign Here** Signature of U.S. person

Date **11/10/25**

## General Instructions

Section references are to the Internal Revenue Code unless otherwise noted.

**Future developments.** For the latest information about developments related to Form W-9 and its instructions, such as legislation enacted after they were published, go to [www.irs.gov/FormW9](http://www.irs.gov/FormW9).

## What's New

Line 3a has been modified to clarify how a disregarded entity completes this line. An LLC that is a disregarded entity should check the appropriate box for the tax classification of its owner. Otherwise, it should check the "LLC" box and enter its appropriate tax classification.

New line 3b has been added to this form. A flow-through entity is required to complete this line to indicate that it has direct or indirect foreign partners, owners, or beneficiaries when it provides the Form W-9 to another flow-through entity in which it has an ownership interest. This change is intended to provide a flow-through entity with information regarding the status of its indirect foreign partners, owners, or beneficiaries, so that it can satisfy any applicable reporting requirements. For example, a partnership that has any indirect foreign partners may be required to complete Schedules K-2 and K-3. See the Partnership Instructions for Schedules K-2 and K-3 (Form 1065).

## Purpose of Form

An individual or entity (Form W-9 requester) who is required to file an information return with the IRS is giving you this form because they



**CODE OF ETHICS  
AND  
CONFLICT OF INTEREST POLICY  
FY 2025**

**As required by the Dept. of Housing and Urban Development**

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## CODE OF ETHICS AND CONFLICT OF INTEREST POLICY

### Introduction and Applicability

The Code of Ethics and Conflict of Interest Policy (the "Code") of Community Redevelopment Associates of Florida, Inc. and its affiliated entities (collectively, "CRA") establishes the ethical standards for CRA in the conduct of its business. The purposes of the Code are to provide evidence of CRA's commitment to the lawful and ethical conduct of its business and to promote lawful and ethical behavior by its employees.

Conflicts of interest may arise in the normal course of conducting CRA's business. The Code is not designed to prohibit conflicts of interest but to protect CRA's interest when it is contemplating entering into a transaction or arrangement. The Code is intended to supplement but not replace any applicable state or federal laws governing ethical conduct or conflicts of interest.

The Code applies to all employees at any CRA affiliated entity and those who have any fiduciary obligations in discharging their duties on behalf of CRA. It is every employee's responsibility to discharge his or her duties in a manner that promotes and preserves public trust, proper stewardship, and confidence in the integrity of CRA. Employees must respect and comply with CRA rules and regulations, observe high standards of conduct, and participate in establishing and maintaining such high standards. **Adverse consequences, including employee termination can result from failure to comply with the Code.**

It is the duty of all employees to review and assess their conduct in light of the provisions of the Code. Each employee shall seek, either in writing or in person, the advice of his or her supervisor when a reasonable doubt regarding an ethical or legal consideration arises.

The Conflict of Interest Disclosure Statement (EXHIBIT A) must be completed annually by all employees.

### I. Policies Governing Ethical Conduct

- A. CRA employees will perform their duties properly, diligently, and in an appropriately courteous manner.
- B. Consistent with the provisions of any applicable document retention policy, no employee shall falsify, destroy, mutilate, conceal, or fail to make required entries on any record within the employee's control, including the destruction of documents that are the subject to public records laws.
- C. Employees with reporting responsibilities shall provide full, fair, accurate, timely, and understandable disclosure in all reports.
- D. Employees shall act honestly and ethically.

- E. No employee shall discriminate on the basis of race, color, religious creed, gender, national origin, age, physical ability, sexual orientation, marital status, or veteran status in the conduct of services for CRA.
- F. Employees who are members of other professional groups are bound by the appropriate professional duties and code of conduct of those roles.
- G. Employees shall comply with all state, federal and local laws, statutes and ordinances.
- H. Employees shall comply with all policies on confidentiality and privacy of information. Employees shall not use confidential or proprietary information for personal financial gain.

## II. Duty of Loyalty to CRA – Avoiding Abuses of Position and Conflicts of Interest

CRA is a for-profit organization. CRA is subject to scrutiny by, and is held accountable to, governmental and regulatory authorities as well as the public.

Consequently, there exists between CRA and its employees a fiduciary duty which carries with it a duty of loyalty. Employees have the responsibility of administering the affairs of CRA honestly and prudently and of exercising their best care, skill, and judgment for the sole benefit of CRA. Moreover, because of the nature of CRA's business, every employee has an affirmative duty to act as a steward of the funds entrusted to CRA by its clients.

Employees shall use the resources, property, and funds under the employee's control judiciously and in the best interest of CRA. Employees shall exercise good faith in all transactions, and they shall not use their positions with CRA or knowledge gained therein for their personal benefit or for the benefit of any other person or organization. The interests of CRA must be the first priority in all decisions and actions.

No employee shall accept, solicit, or agree to accept any gift, favor, complimentary service, or other thing of value under circumstances from which it might be reasonably inferred that such gift, service, or other thing of value was given or offered for the purpose of influencing the employee in the discharge of his or her duties. Vendor selections and purchasing decisions must always be business decisions based on merit: by comparing and evaluating price, quality, performance, and suitability. Decisions must not be influenced by any other factor, such as personal relationships, gifts or hospitality.

**A. Areas in Which Conflicts May Arise:** A conflict of interest may arise in the relations of employees with any of the following third parties, at a minimum:

- Persons and firms supplying or *potentially* supplying goods and services to CRA (vendors and professionals), including, but not limited to:
  - Construction services.
  - Professional services, including accounting and legal services.
  - Contracts with individuals, including consultants and part time employees.

### A. Areas in Which Conflicts May Arise Continued:

- Contracts with *companies* providing non-professional services, such as marketing, research services, information technology, consulting or other services, etc.
- Persons and firms from whom CRA purchases or leases property and equipment.
- Persons and firms with whom CRA is dealing or planning to deal in connection with the purchase or sale of real estate, securities, or other property.
- Persons or parties with a direct, material, financial interest in the outcome of CRA programs, policies or positions.
- Customers of CRA services.
- Agencies, nonprofits, and associations that affect the operations of CRA.
- Entities from whom CRA receives grants or for whom CRA administers grants.

### B. Nature of Conflicting Interest: A conflicting interest may be defined as an interest, direct or indirect, with any persons or firms listed in Section A. Such an interest might arise through:

- An association with any entity that deals with CRA of which an employee or an immediate family member is a partner or a controlling shareholder, executive officer, or has any other position with another entity that would reasonably cause the appearance of a conflict of interest. Any question regarding independence should be reviewed by Corporate General Counsel.
- Receiving compensation for services with respect to individual transactions involving CRA.
- Using CRA time, personnel, equipment, supplies, or goodwill for any purpose other than CRA-approved activities, programs, or purposes.
- Receiving allowances from CRA (other than incidental amounts incurred while traveling with any excess promptly repaid in full) if you are an employee of CRA.
- Receiving any gift, courtesy or loan from third parties dealing or competing with CRA, or seeking to deal with CRA, except for gifts with a value of less than fifteen dollars (\$15) that could not be refused without discourtesy and which will not give rise to the perception that the employee's independent judgment might be compromised. **Nominal gifts such as pens; caps; paperweights; t-shirts; coffee mugs; soft drinks; flowers; chocolates or other small tokens may be accepted.** No personal gift of cash or a cash equivalent (i.e. gift cards, gift checks, vouchers, phone cards, checks or money orders, etc.); special discount; tickets for entertainment where the host will not be present; gifts that would embarrass CRA; or situations where CRA's commitment to diversity and respect for others could be violated or could cause unease, such as adult entertainment, shall ever be accepted from a vendor. Employees shall never request gifts or hospitality of any sort. Employees shall avoid a pattern of accepting frequent courtesies from the same person or company.

### C. Conflict of Interest Disclosure Procedures:

The areas of conflicting interest listed in Section A, and the relationships in those areas that may give rise to conflicts, as listed in Sections B, are not exhaustive. Conflicts may arise in other areas or through other relationships. The Code does not prohibit conflict of interest transactions but instead provides a framework for conflict avoidance and management. However, if an employee believes that he or she is in a possible conflict situation, he or she should assume that a conflict does exist and act accordingly.

The fact that one of the interests described in Section A or B exists does not necessarily mean that a conflict exists, or that the conflict, if it exists, is material enough to be of practical importance, or if material, that upon full disclosure of all relevant facts and circumstances, it is necessarily adverse to the interests of CRA. However, it is the policy of CRA that the existence of any of the interests described in Section B must be disclosed before any transaction is consummated. Moreover, all disclosed conflicts shall be addressed in accordance with the procedures set forth below.

It shall be the continuing responsibility of employees to scrutinize their transactions and outside business interests and relationships for potential conflicts and to immediately make any necessary disclosures. In deciding whether a transaction might constitute a conflict of interest, an employee should ask these questions:

- Is the transaction included as a scenario in the Frequently Asked Questions attached to the Code?
- Would the transaction be prudent, be in good faith, and be in the best interests of CRA?
- Would the transaction affect any decision I will make for CRA?
- How would the transaction look to someone outside of CRA, such as a donor, a public watchdog group, the state attorney general, the news media or a Congressional Committee?
- How would the transaction seem to others within CRA? Would they think it might affect how I do my job for CRA?

#### 1. Annual Statements

Each employee shall annually sign a Conflict of Interest Disclosure Statement, which describes any existing or potential conflict of interest and affirms that such person:

- a. Has received a copy of the Code;
- b. Has read and understands the Code; and
- c. Has agreed to comply with the Code.

Conflict of Interest Disclosures shall be filed on or before January 31st of each year.

## 2. Continuing Disclosure

In connection with any actual or potential conflict of interest, an employee must disclose the existence of the Financial Interest as defined in Part V on a Conflict of Interest Disclosure Statement.

The receipt of an offer of any gift(s) exceeding the value of \$15 must be reported immediately to your supervisor. In each instance, a Conflict of Interest Disclosure Statement should be filed with CRA's Corporate General Counsel or CEO. One or both will review the circumstances to determine if a potential conflict of interest exists and communicate its decision to the supervisor. No gift in excess of the value of \$15 may be accepted.

## 3. Procedures for Addressing the Conflict of Interest

In general, once a conflict of interest transaction is identified, the employee with the conflict shall not attempt to influence other decision makers regarding the matter, and shall not participate in any discussion of the transaction except to respond to information requests. In addition, if the employee is in a position to vote on, or otherwise participate in the decision with respect to, the conflict of interest transaction, he or she shall abstain from any such vote or participation. It shall be the responsibility of the decision-making authority or body to properly record in the minutes of any discussion regarding a conflict of interest transaction the name of the person who discloses the conflict of interest, the nature of the conflict of interest, and documentation of the comparability data (i.e. industry surveys, compensation studies, competitive bids, etc.), if any, used in determining whether CRA should enter into the transaction.

## D. Violations of the Conflicts of Interest Policy

If CRA's Corporate General Counsel or CEO has reasonable cause to believe an employee has failed to disclose actual or possible conflicts of interest, it shall inform the employee of the basis for such belief and afford the employee an opportunity to explain the alleged failure to disclose.

If, after reviewing the employee's response and after making further investigation as warranted by the circumstances, it is determined the employee has failed to disclose an actual or possible conflict of interest, CRA shall initiate appropriate disciplinary and corrective action.

## III. Confidential Information

Employees shall not violate CRA privacy and confidentiality policies. In addition, employees shall not use confidential or proprietary information for personal financial gain. Nor shall they disclose confidential or proprietary information to any and all outside parties for any reason. This duty shall survive the employee's term of employment.

#### IV. Reporting Conflicts and Violations - Duties, Protections and Corrective Actions

A. Each employee shall immediately report conflicts and violations of the Code, criminal law, or the attempt to induce another to violate these standards or violate criminal law, in accordance with established policies. A failure to report a violation is itself a violation of the Code. If anonymity is requested, CRA will not disclose the identity of the reporting individual except as needed to properly investigate the allegation, or unless legally required to do so.

CRA's Whistleblower Protection Policy (attached hereto as EXHIBIT B and incorporated herein by reference) establishes the protections against retaliatory actions for any reports of Code violations.

B. An employee found to be in violation of the Code shall be subject to corrective actions taken by the appropriate level manager. Such action may include further training and instruction regarding the provisions of the Code, necessary steps to remediate any harm to CRA, fellow employees, or others, and disciplinary actions up to and including termination. Each violation will be assessed on an individual case by case basis and the corrective action tailored to the specifics of that violation. When deciding what action is necessary, consideration will be given to the flagrancy of the violation, the harm caused, whether the violation was intentional or unintentional, whether the employee voluntarily disclosed the violation, prior misconduct, the likelihood of future misconduct, the general circumstances surrounding the violation, and other considerations as appropriate.

C. When an employee completes the annual conflict of interest disclosure statement, the employee must disclose all of the items on the questionnaire for the past calendar year. Any intentional failure to disclose required information or the provision of information that is inaccurate or false in nature is a violation of the Code. In addition, there is a continuing duty to disclose any conflict of interest that arises during the course of the year.

#### V. Definitions

##### 1. **Financial Interest:**

A person has a financial interest if the person has, directly or indirectly, through business, investment, or family:

- a. An ownership or investment interest in any entity with which CRA has a transaction or arrangement;
- b. A compensation arrangement with CRA or with any entity or individual with which CRA has a transaction or arrangement; or
- c. A potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which CRA is negotiating a transaction or arrangement.

Compensation includes direct and indirect remuneration as well as gifts or favors that are not nominal in value. Compensation does not include the reimbursement of reasonable expenses incurred in connection with the performance of CRA duties.

**1. Financial Interest Continued:**

A Financial Interest is not necessarily a conflict of interest. A person who has a Financial Interest may have a conflict of interest if the appropriate reviewing body determines that a conflict of interest exists.

**2. CRA's Corporate General Counsel:**

Alan Baseman Esq.  
Comiter, Singer, Baseman & Braun  
3801 PGA Blvd., Suite 604  
Palm Beach Gardens, Fl 33410  
(561) 626-2101

**Any Employee who feels he or she cannot report to an immediate supervisor or Corporate Officer may report any suspected violation of the Code of Ethics and Conflict of Interest Policy directly to CRA's Corporate General Counsel.**

ORIGINAL

**EXHIBIT A - 2025  
CONFLICT OF INTEREST DISCLOSURE STATEMENT  
(FILED ANNUALLY AND WHEN A CONFLICT OF INTEREST ARISES)**

In order to be comprehensive, this statement of disclosure/questionnaire requires you to provide information with respect to certain parties that are related to you. These persons are termed "affiliated persons" and include the following:

- a. your spouse, domestic partner, parents, grandparents, siblings, children, grandchildren, great grandchildren, and spouses of parents, grandparents, siblings, children, grandchildren and great grandchildren or anyone residing with you.
- b. any entity that deals with CRA of which:
  - you are a partner or a controlling shareholder or executive officer; or
  - you have any other position, financial or otherwise, that would cause the appearance of a conflict of interest. Any question regarding a conflict of interest should be reviewed by Corporate General Counsel.

1. YOUR NAME (Please print)

\_\_\_\_\_

2. YOUR CRA POSITION:

- \_\_\_\_\_ Board of Directors
- \_\_\_\_\_ Officer
- \_\_\_\_\_ Supervisor
- \_\_\_\_\_ Employee (position): \_\_\_\_\_

3. Have you or any of your affiliated persons been employed by or provided services or property to CRA in the past year other than in your capacity shown in question two (2) above?  
 \_\_\_\_\_ YES \_\_\_\_\_ NO

If yes, please describe the nature and value of the services or property, and if an affiliated person is involved, the identity of the affiliated person and your relationship with that person:

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

4. Have you or any of your affiliated persons purchased services or property from CRA in the past year?  
 \_\_\_\_\_ YES \_\_\_\_\_ NO

If yes, please describe the purchased services or property and the value and, if an affiliated person is involved, the identity of the affiliated person and your relationship with that person:

\_\_\_\_\_  
 \_\_\_\_\_

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5. Have you or any of your affiliated persons had any direct or indirect interest in any business transaction(s) or other business relationship in the past year to which CRA, it's affiliates, was, is or are a party?  
 \_\_\_\_\_ YES \_\_\_\_\_ NO

If yes, describe the transaction(s) or relationship and value, and if an affiliated person is involved, the identity of the affiliated person and your relationship with that person:

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6. Are you or any of your affiliated persons a party to, or have an interest in, any pending legal proceedings involving CRA?  
 \_\_\_\_\_ YES \_\_\_\_\_ NO

If yes, please describe the proceeding(s) and magnitude of potential claims or settlements if any, and, if an affiliated person is involved, the identity of the affiliated person and your relationship with that person:

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7. Are you aware of any other events, transactions, arrangements, or other situations that have occurred or may occur in the future that you believe should be examined by CRA in accordance with the terms and intent of CRA's Code of Ethics and Conflict of Interest Policy?  
 \_\_\_\_\_ YES \_\_\_\_\_ NO

If yes, please describe the situation(s), and, if an affiliated person is involved, the identity of the affiliated person and your relationship with that person:

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8. Have you received any gift or loan from a third party dealing or competing with CRA, or seeking to deal with CRA, that exceeded the value of fifteen dollars (\$15) and that was not returned to the giver?  
 \_\_\_\_\_ YES \_\_\_\_\_ NO

If yes, please describe the situation(s), and all of the facts and circumstances and amounts involved.

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I hereby confirm that I have read and understand CRA's Code of Ethics and Conflict of Interest Policy and that my responses to the above questions are complete and correct to the best of my information and belief.

I agree that if I become aware of any information that might indicate that this disclosure is inaccurate or that I have not complied with the Code of Ethics and Conflict of Interest Policy, I will immediately notify Corporate General Counsel (or CEO).

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

ORIGINAL

## EXHIBIT B

### **Whistleblower Protection Policy: Reporting Suspected Violations of Law or Misconduct**

Community Redevelopment Associates of Florida, Inc. and its affiliated entities ("CRA") are committed to maintaining a workplace where employees are free to raise good faith concerns regarding CRA's business practices, specifically: **(1)** reporting suspected violations of law on the part of CRA, including but not limited to federal laws and regulations; **(2)** providing truthful information in connection with an inquiry or investigation by a court, agency, law enforcement, or other governmental body; and **(3)** identifying potential violations of CRA's Code of Ethics.

CRA policy forbids any retaliatory action, including harassment, intimidation, or adverse employment actions of any kind, to be taken against an individual who, in good faith, reports a suspected violation of law or the Code of Ethics, or who in good faith complains about, or raises a claim or concern about, any type of harassment, retaliation or discrimination prohibited by applicable law or CRA policy. Retaliation is also prohibited against individuals who are not themselves complainants, but who participate in good faith in an investigation. Any employee who engages in any form of retaliation will be subject to discipline, up to and including employee termination or removal of volunteer from his or her position. **Individuals who believe that they or someone they know are being, or have been, retaliated against should immediately report this to his or her appropriate supervisor, CRAs Corporate General Counsel or CEO.**

## Frequently Asked Questions Regarding Potential Ethical Dilemmas

The purpose of this section is to provide employees with a non-exhaustive list of potential ethical dilemmas that may arise and how the Code of Ethics and Conflicts of Interest Policy would serve to guide their actions and behavior. If any employee is ever unsure as to what is appropriate legal or ethical behavior, the employee should consult with his or her supervisor. Also, Corporate General Counsel is always available to answer any questions regarding ethical considerations.

### Some Possible Scenarios

#### Duty to Report

**Question** – I work for CRA and one of the reasons I chose to work here is that it feels good to be a part of an organization that does something important and positive. The other day I saw one of my colleagues doing something that I am pretty sure is a violation of the Code of Ethics. I do not want to get anyone in trouble. What should I do?

**Answer** – No one likes the feeling of reporting the wrong conduct of another. At the same time, the work environment that we all enjoy is a result of respectful behavior. When it seems clear that another employee is doing something unethical, then each of us has an obligation to report that behavior to an **appropriate supervisor, CEO and/or to CRA's Corporate General Counsel.**

#### Gifts and Hospitality

**Question** – I work with our vendors as part of my job and from time to time they will offer to take me out to lunch or some other social outing. Is it permissible for me to accept these gifts?

**Answer** – The Code of Ethics and Conflicts of Interest Policy has specific provisions about accepting gifts. As a general rule, we should decline even small gifts where it is not going to be perceived as impolite or cause us to harm a vendor relationship. It is easy to use this Code as an excuse why you are unable to accept a vendor's generosity. Under no circumstances should you accept a gift worth more than \$15. You are under no obligation to accept any gift.

**Question** – A vendor asks me to accompany him to a baseball game at which we plan to discuss business. May I go?

**Answer** – Yes, as long as the ticket has a face value of less than \$15 and the outings are infrequent (one per year).

**Question** – Occasionally, a vendor will call and offer to give me tickets to a sports event or a concert. The face value of the tickets is less than \$15. May I accept this gift?

**Answer** – No. The gift does not serve a CRA business purpose.

**Question** – May I purchase sporting or concert tickets from a vendor?

**Answer** – Yes, as long as the event is not “Sold Out”. Under those circumstances you would be accepting a gift of an opportunity to buy tickets that are not generally available for purchase and that is inappropriate.

**Question** –Is our department allowed to keep flowers, chocolates, or other small treats sent from a vendor?

**Answer** – Generally it is appropriate to accept such occasional, infrequent, nominal gifts, but they should be shared with your co-workers.

**Question** – I have been invited by a vendor to go to a conference in another city about new issues facing technology departments. The vendor is offering to pay for my plane, hotel, meals, and to take me golfing once or twice while we are there for the weekend. My department was debating about whether to send me to the conference at CRA’s expense before this offer was extended. Should I accept this gift from the vendor?

**Answer** – **This type of gift offer should be brought to the attention of both your supervisor and CRA’s Corporate General Counsel.** Even if this is a conference that CRA was considering asking you to attend, it is always inappropriate to accept the gift from the vendor. If you are involved in the review of purchases and potential purchases from this vendor, the offer to buy your meals and pay for your golfing (or other activities) are too close to creating a real conflict issue and should not be accepted.

### **Confidentiality and Privacy**

**Question** - I was part of a team that selected a vendor for a particularly large project for us. I would like to buy shares of the vendor’s stock now because I think once it becomes public that the vendor is doing such a large project for us, the shares of the vendor’s stock will increase significantly. Is it permissible for me to make this trade?

**Answer** – No, it is not permissible for you to buy or sell shares of publicly traded stock based on confidential information. In fact, you may be subjecting yourself to prosecution by the Securities and Exchange Commission if you do so.

### **Doing Business With Relatives**

**Question** – CRA administers a purchase assistance program. My spouse is a real estate agent. Can I recommend my spouse to program applicants to help them purchase a house?

**Answer** – No. This is a situation where there is clearly the appearance of impropriety since your spouse (and indirectly you) would benefit monetarily from the purchase of the property.

**Question** – My brother owns a construction materials company. I was asked by a contractor if I could get them a good price on materials. The contractor purchased from my brother's company. Do I need to disclose the relationship?

**Answer** – Yes. If any of your affiliated persons provide services or property to a program administered by CRA the transaction must be disclosed. If a transaction has occurred since the last Conflict of Interest Disclosure Statement, you should submit an updated Conflict of Interest Disclosure Statement to CRA.

ORIGINAL



## Section 1 – Employee Conduct

An employee shall be subject to disciplinary action ranging from a formal verbal warning up to and including, discharge for the following:

- A. Neglect of duty.
- B. Insubordination or refusal to comply with the Employer or Supervisor's instructions, unless such instructions are injurious to the employee's safety and health or would result in an illegal act.
- C. Immoral or indecent conduct.
- D. Violation of any local, State, or Federal law.
- E. Falsification of personnel records, payroll reports or other records.
- F. Theft, destruction, or defacing of CRA, employee or client property.
- G. Conduct endangering the safety of self or other employees, including the provocation or instigation of violence.
- H. Abusive, threatening or coercive treatment of another employee, member of the public or client.
- I. Admitting an unauthorized person or persons into any locked or restricted area.
- J. ***Violations of the corporate Code of Ethics/Conflict of Interest Policy to which this document is hereby incorporated.***
- K. Excessive absenteeism.
- L. Excessive tardiness.
- M. Inattentiveness to work, including but not limited to, failure to start work at the designated time, quitting work before proper time, or leaving assigned work area, building, or project during working hours without authorization from appropriate supervisor.
- N. Posting unauthorized materials on walls or bulletin boards, or defacing and/or removing authorized material from bulletin boards.
- O. Smoking in prohibited areas.
- P. Failure to report for work without giving notice of absence within two hours after the beginning of the scheduled workday. Any employee who is absent without permission and fails to report his or her absence for three consecutive work days shall be deemed to have abandoned his or her job.

## Section 2 – Disciplinary Procedure

An employee shall be subject to disciplinary action up to and including discharge according to the following procedure for a singular conduct violation:

- A. **Verbal warning.** Verbal statement to employee that he/she has violated a rule and/or regulation and that such violation may not continue.
- B. **Written reprimand.** Formal notification in writing to employee that he/she has violated a rule and/or regulation.
- C. **Discharge.** The employer/employee relationship is severed.

If an employee receives three verbal warnings for different conduct violations within a period of 12 consecutive months, the employee at the time of the issuance of the third such notice, shall in addition, be subject to a written reprimand. A fourth conduct violation including violations of the corporate Code of Ethics/Conflict of Interest Policy will result in immediate discharge.

### **EMPLOYEE CONDUCT POLICY ACKNOWLEDGEMENT**

I hereby acknowledge that I have received and read this Employee Conduct Policy. I also understand that I must abide by the policy as a condition of initial and/or continued employment, and any violation may result in disciplinary action up to and including discharge.

I also understand that the Employee Conduct Policy and related documents are not intended to constitute a contract between the company and me.

The undersigned further states that he or she has read the forgoing acknowledgement and knows the contents thereof and signs the same of his or her own free will.

\_\_\_\_\_  
SIGNATURE Employee

\_\_\_\_\_  
Date

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
SIGNATURE CRA of FL, Inc. Authorized Manager

\_\_\_\_\_  
Date

\_\_\_\_\_  
Print Name



## **Environmental Review Policies, Procedures and Training Manual Version 1.3**

Prepared by Community Redevelopment Associates of Florida Inc.

# City of Pembroke Pines

## Planning and Economic Development Department

### Environmental Review (24 CFR Part 58)

#### Introduction

The City of Pembroke Pines, as a Participating Jurisdiction (PJ) and responsible entity, has assumed the responsibility for environmental review, decision making, and action that would otherwise apply to the U.S. Department of Housing and Urban Development (HUD) under the National Environmental Policy Act of 1969 (NEPA) and other provisions of the law that further the purposes of NEPA as specified in Title 24 Part 58.5, by execution of a grant agreement with HUD. It is the City's goal to fulfill these responsibilities to ensure compliance with all federal regulations as outlined in Title 24 Part 58.

This manual is intended to give guidance in conducting the environmental review function in the administration of federal grant programs.

#### **Purpose of Environmental Review Process**

The purpose of these environmental procedures is to ensure that all projects funded with federal funds are following all applicable federal laws and authorities identified in *Title 24 Part 58: Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities*. Also, these procedures are intended to insure a suitable living environment, or more specifically, to determine if any significant environmental impact may occur as a result of a proposed project; to release funds to support eligible projects that neither harm nor are harmed by the environment; to safeguard, enhance, and restore the environment; and to foster public participation in the development decision-making process.

#### **Project Review**

All projects that are submitted to the City of Pembroke Pines Planning and Economic Development Department (the Department) for review pursuant to its CDBG Consolidated Plan and Annual Action Plans and any other proposal in response to a federally funded project, must go through the Project Review process. Proposed projects include those submitted to the Department developed by the appropriate department/ agency.

Under HUD rules, even if federal funds support only a portion of the project, the full project and its impacts must be examined before any funds are obligated or expended.

#### **Requirements for Environmental Review**

All federally funded projects (e.g., CDBG, HOME, ESG, Disaster Grants, etc.) are subject to environmental review using the criteria and statutory authorities specified in the HUD regulations 24 CFR Part 58 and for more complex projects, using procedures from the National Environmental Protection Act (NEPA).

## Environmental Review Record

A written record of the environmental review undertaken under this part for each project will be maintained. This document will be designated the "Environmental Review Record" (ERR) and shall be available for public review. The Environmental Review must use the current HUD recommended formats (or develop equivalent formats) or use HUD's HEROS system to complete the review.

The ERR shall contain all the governmental review documents, public notices and written determinations or environmental findings required by 24 CFR Part 58 as evidence of review, decision making and actions pertaining to a particular project. As appropriate, the ERR shall:

- (1) Describe the project and activities the recipient has determined to be part of the project.
- (2) Evaluate the effects of the project or the activities on the human environment.
- (3) Document compliance with applicable status and authorities, particularly those cited in Section 58.5 and 58.6; and
- (4) Record the written determinations and other review findings required by this part.

The ERR shall also contain as appropriate, verifiable source documents and relevant base data used or cited in EAs, EISs, or other project review documents. These documents may be incorporated by reference into the ERR provided that each source document is identified and available for inspections by interested parties. Proprietary material and special studies prepared for the recipient that are not otherwise generally available for public review shall not be incorporated by reference but shall be included in the ERR.

## GENERAL STEPS: A SUMMARY OF ENVIRONMENTAL REVIEW PROCESS

A project approved or submitted to the Department for funding approval triggers the initiation of the environmental review process. The Department Director or Assistant Director shall have designated a staff member or other such designee such as a contracted administrator to make an initial appraisal of the project and environmental conditions. A description of key steps in implementing the environmental requirements is as follows:

1. Create an ERR file with appropriate project identification.
2. Project or Project Aggregation - determine the scope of activity or activities comprising the project: consider all other related activity or activities that may be grouped and consider their aggregate potential impact. Activities may be grouped geographically or functionally. See §58.32 for full description of aggregation, including descriptions of geographic and functional aggregation.
3. Project managers must submit an acceptable project description for review by the Department. **The project description must detail the exact use of funds.** At a minimum, the project description shall include and address the following:
  - ✦ Project Name; Funding Source; and Project Number
  - ✦ Estimated Total Project Cost (plus estimated HUD Funding by Program if total cost exceeds subject grant amount)
  - ✦ Project Location (address, site map)
  - ✦ Use of Project (park, affordable housing, public services)
  - ✦ Size of Project (sq. ft., no. of units, etc.)
  - ✦ Services provided.
  - ✦ Population served by the project.
  - ✦ Number of persons to be served by the project.
  - ✦ Number of persons to be relocated if any.
  - ✦ Type of Construction (new construction, rehabilitation, conversion.)
4. Determine the level of review required utilizing the flow chart and procedures on the following pages. Levels of environmental review are characterized by the degree to which the regulations require a review or compliance determination under the statutes cited in (58.34, 58.35, 58.36, 58.37) of the HUD regulations. In order from simplest to most complex, they are:

**Exempt Activities:** activities that meet the requirements of the regulations under 24 CFR 58.34 (a)(1)-(11) do not have to comply with the other provisions of law or authorities cited in Section 58.5 except for the applicable requirement of Section 58.6.

**Categorical Exclusion not subject to 58.5:** activities that, according to the regulations under 24 CFR 58.35(b), would not alter any conditions that would require a review or compliance determination under the Federal laws and authorities cited in §58.5. However, these activities are still subject to 58.6.

**Categorical Exclusions subject to 58.5:** activities that, according to regulations under 24 CFR 58.35(a), do not require an EIS or an EA plus FONSI, but do require compliance with the federal statutes on the Statutory Checklist. In addition, after completion of the Statutory Checklist, if the activity does not trigger compliance with any of the laws and authorities, it can convert to an exemption as outlined in 58.34(a)(12).

**Environmental Assessment:**

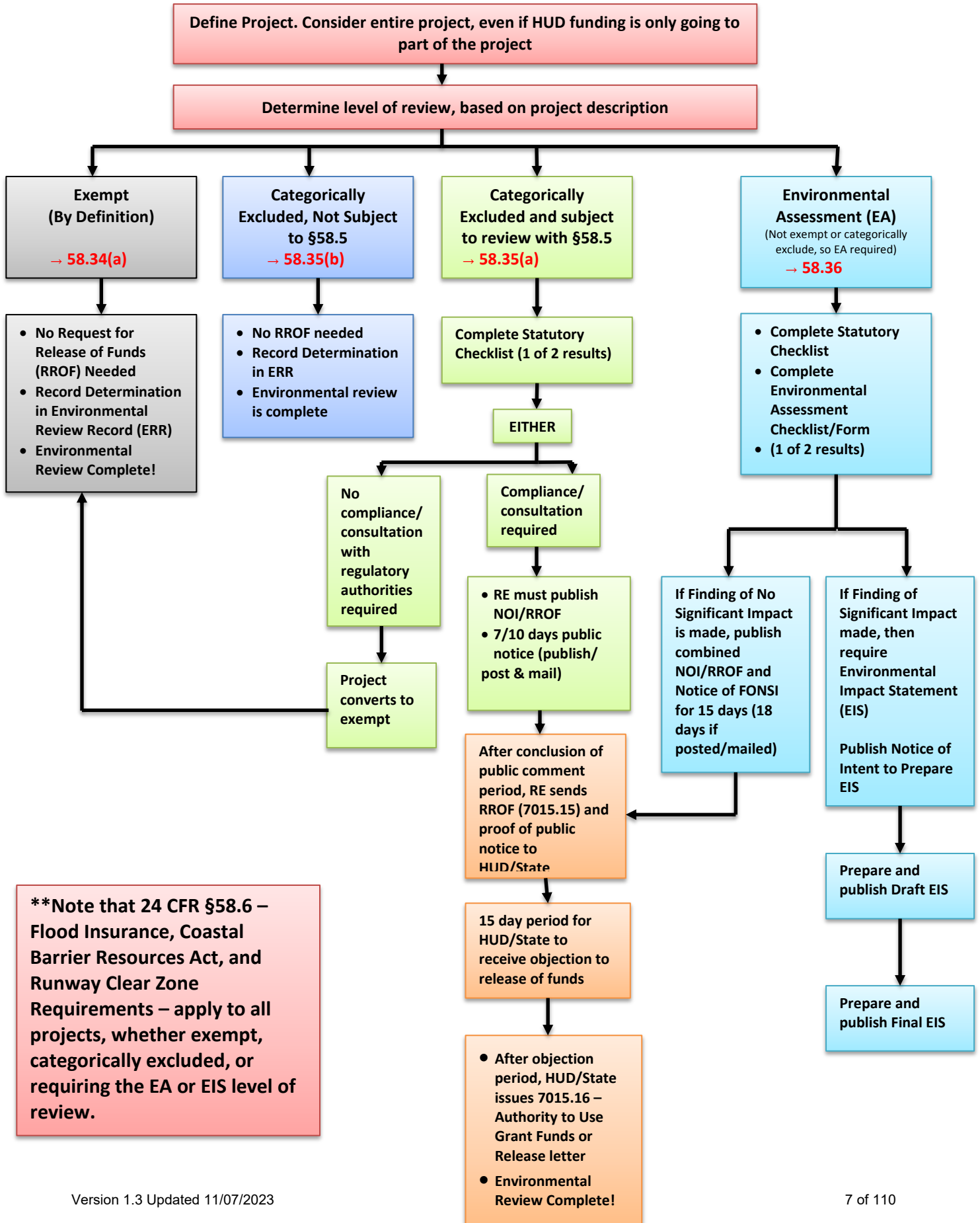
**Environmental Impact Statement Not Required:** activities that are neither exempt nor categorically excluded, which fall below the threshold of activities requiring an EIS. An EA must be prepared in accordance with Subpart E of Part 58.

**Environmental Impact Statement Required:** activities that are neither exempt nor categorically excluded, which exceed the threshold of activities requiring an EA.

5. Collect and evaluate data and information from other sources such as but not limited to FEMA flood maps, wetland inventory maps and soil survey maps.
6. Initiate contact with other agencies requesting jurisdictional confirmation of the City's determination.
7. Make the environmental determination and complete all required forms, i.e., the Statutory Checklist and Environmental Assessment forms. As appropriate, publish and disseminate a Notice of Intent to Request Release of Funds (NOI/RROF) for Level 3 projects. If any of the categorical exclusions listed in Section 58.35(a) do not require compliance with any other Federal laws and authorities cited in Section 58.5, the project converts to Exempt, per Section 58.34(a)(12) and a NOI/RROF notice is not required.
8. For Level 4, publish a combined NOI/RROF and FONSI.
9. Submit official determination for the Certifying Officer's signature.
10. Prepare the RROF, HUD Form 7015.15 to be submitted to HUD along with a letter of submittal signed by the City Manager or designee along with a copy of all pertinent publications. This information will be forwarded via Federal Express – Priority Overnight at the end of the 15-day comment period to HUD.
11. Wait for receipt of signed Authorization to Use Federal Funds (HUD Form 7015.16) from HUD.
12. Funds cannot be expended until the City has received the Authorization to Use Federal Funds from HUD. This step will ensure that contracts and Letters of Agreement are not executed prior to the completion of the environmental review process.
13. Record the process of conducting the preceding steps by concluding the Environmental Review Record (ERR) for the project in HEROS or if not in HEROS, filing it for public review or audit in the Department's central files and website. The purpose of the ERR is to document compliance with HUD regulations and with NEPA.

## **24 CFR Part 58 Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities**

# Environmental Review Process (To Be Conducted by Responsible Entity)



**\*\*Note that 24 CFR §58.6 – Flood Insurance, Coastal Barrier Resources Act, and Runway Clear Zone Requirements – apply to all projects, whether exempt, categorically excluded, or requiring the EA or EIS level of review.**

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## PART 58 - ENVIRONMENTAL REVIEW PROCEDURES FOR ENTITIES ASSUMING HUD ENVIRONMENTAL RESPONSIBILITIES

**Authority:** 12 U.S.C. 1707 note, 1715z-13a(k); 25 U.S.C. 4115 and 4226; 42 U.S.C. 1437x, 3535(d), 3547, 4321-4335, 4852, 5304(g), 12838, and 12905(h); title II of Pub. L. 105-276; E.O. 11514 as amended by E.O. 11991, 3 CFR, 1977 Comp., p. 123.

**Source:** 61 FR 19122, Apr. 30, 1996, unless otherwise noted.

### Subpart A - Purpose, Legal Authority, Federal Laws and Authorities

#### § 58.1 Purpose and applicability.

- (a) **Purpose.** This part provides instructions and guidance to recipients of HUD assistance and other responsible entities for conducting an environmental review for a particular project or activity and for obtaining approval of a Request for Release of Funds.
- (b) **Applicability.** This part applies to activities and projects where specific statutory authority exists for recipients or other responsible entities to assume environmental responsibilities. Programs and activities subject to this part include:
  - (1) Community Development Block Grant programs authorized by Title I of the Housing and Community Development Act of 1974, in accordance with section 104(g) (42 U.S.C. 5304(g));
  - (2) [Reserved]
  - (3)
    - (i) Grants to states and units of general local government under the Emergency Shelter Grant Program, Supportive Housing Program (and its predecessors, the Supportive Housing Demonstration Program (both Transitional Housing and Permanent Housing for Homeless Persons with Disabilities) and Supplemental Assistance for Facilities to Assist the Homeless), Shelter Plus Care Program, Safe Havens for Homeless Individuals Demonstration Program, and Rural Homeless Housing Assistance, authorized by Title IV of the McKinney-Vento Homeless Assistance Act, in accordance with section 443 (42 U.S.C. 11402);
    - (ii) Grants beginning with Fiscal Year 2001 to private non-profit organizations and housing agencies under the Supportive Housing Program and Shelter Plus Care Program authorized by Title IV of the McKinney-Vento Homeless Assistance Act, in accordance with section 443 (42 U.S.C. 11402);
  - (4) The HOME Investment Partnerships Program authorized by Title II of the Cranston-Gonzalez National Affordable Housing Act (NAHA), in accordance with section 288 (42 U.S.C. 12838);
  - (5) Grants to States and units of general local government for abatement of lead-based paint and lead dust hazards pursuant to Title II of the Departments of Veterans Affairs and Housing and Urban Development and Independent Agencies Appropriations Act, 1992, and grants for lead-based paint hazard reduction under section 1011 of the Housing and Community Development Act of 1992, in accordance with section 1011(o) (42 U.S.C. 4852(o));
  - (6)
    - (i) Public Housing Programs under Title I of the United States Housing Act of 1937, including HOPE VI grants authorized under section 24 of the Act for Fiscal Year 2000 and later, in accordance with section 26 (42 U.S.C. 1437x);
    - (ii) Grants for the revitalization of severely distressed public housing (HOPE VI) for Fiscal Year 1999 and prior years, in accordance with Title II of the Departments of Veterans Affairs and Housing and Urban Development, and Independent Agencies Appropriations Act, 1999 (Pub. L. 105-276, approved October 21, 1998); and
    - (iii) Assistance administered by a public housing agency under section 8 of the United States Housing Act of 1937, except for assistance provided under part 886 of this title, in accordance with section 26 (42 U.S.C. 1437x);
  - (7) Special Projects appropriated under an appropriation act for HUD, such as special projects under the heading "Annual Contributions for Assisted Housing" in Title II of various Departments of Veterans Affairs and Housing and Urban Development, and Independent Agencies Appropriations Acts, in accordance with section 305(c) of the Multifamily Housing Property Disposition Reform Act of 1994 (42 U.S.C. 3547);
  - (8) The FHA Multifamily Housing Finance Agency Pilot Program under section 542(c) of the Housing and Community Development Act of 1992, in accordance with section 542(c)(9)(12 U.S.C. 1707 note);
  - (9) The Self-Help Homeownership Opportunity Program under section 11 of the Housing Opportunity Program Extension Act of 1996 (Pub. L. 104-120, 110 Stat. 834), in accordance with section 11(m));
  - (10) Assistance provided under the Native American Housing Assistance and Self-Determination Act of 1996 (NAHASDA), in accordance with:
    - (i) Section 105 for Indian Housing Block Grants and Federal Guarantees or Financing for Tribal Housing Authorities (25 U.S.C. 4115 and 4226); and
    - (ii) Section 806 for Native Hawaiian Housing Block Grants (25 U.S.C. 4226);

- (11) Indian Housing Loan Guarantees authorized by section 184 of the Housing and Community Development Act of 1992, in accordance with section 184(k) (12 U.S.C. 1715z-13a(k)); and
  - (12) Grants for Housing Opportunities for Persons with AIDS (HOPWA) under the AIDS Housing Opportunity Act, as follows: competitive grants beginning with Fiscal Year 2001 and all formula grants, in accordance with section 856(h) (42 U.S.C. 12905(h)); all grants for Fiscal Year 1999 and prior years, in accordance with section 207(c) of the Departments of Veterans Affairs and Housing and Urban Development, and Independent Agencies Appropriations Act, 1999 (Pub. L. 105-276, approved October 21, 1998).
- (c) When HUD assistance is used to help fund a revolving loan fund that is administered by a recipient or another party, the activities initially receiving assistance from the fund are subject to the requirements in this part. Future activities receiving assistance from the revolving loan fund, after the fund has received loan repayments, are subject to the environmental review requirements if the rules of the HUD program that initially provided assistance to the fund continue to treat the activities as subject to the Federal requirements. If the HUD program treats the activities as not being subject to any Federal requirements, then the activities cease to become Federally-funded activities and the provisions of this part do not apply.
- (d) To the extent permitted by applicable laws and the applicable regulations of the Council on Environmental Quality, the Assistant Secretary for Community Planning and Development may, for good cause and with appropriate conditions, approve waivers and exceptions or establish criteria for exceptions from the requirements of this part.

[61 FR 19122, Apr. 30, 1996, as amended at 68 FR 56127, Sept. 29, 2003]

## § 58.2 Terms, abbreviations and definitions.

- (a) For the purposes of this part, the following definitions supplement the uniform terminology provided in 40 CFR part 1508:
- (1) **Activity** means an action that a grantee or recipient puts forth as part of an assisted project, regardless of whether its cost is to be borne by the HUD assistance or is an eligible expense under the HUD assistance program.
  - (2) **Certifying Officer** means the official who is authorized to execute the Request for Release of Funds and Certification and has the legal capacity to carry out the responsibilities of § 58.13.
  - (3) **Extraordinary Circumstances** means a situation in which an environmental assessment (EA) or environmental impact statement (EIS) is not normally required, but due to unusual conditions, an EA or EIS is appropriate. Indicators of unusual conditions are:
    - (i) Actions that are unique or without precedent;
    - (ii) Actions that are substantially similar to those that normally require an EIS;
    - (iii) Actions that are likely to alter existing HUD policy or HUD mandates; or
    - (iv) Actions that, due to unusual physical conditions on the site or in the vicinity, have the potential for a significant impact on the environment or in which the environment could have a significant impact on users of the facility.
  - (4) **Project** means an activity, or a group of integrally related activities, designed by the recipient to accomplish, in whole or in part, a specific objective.
  - (5) **Recipient** means any of the following entities, when they are eligible recipients or grantees under a program listed in § 58.1(b):
    - (i) A State that does not distribute HUD assistance under the program to a unit of general local government;
    - (ii) Guam, the Northern Mariana Islands, the Virgin Islands, American Samoa, and Palau;
    - (iii) A unit of general local government;
    - (iv) An Indian tribe;
    - (v) With respect to Public Housing Programs under § 58.1(b)(6)(i), fiscal year 1999 and prior HOPE VI grants under § 58.1(b)(6)(ii) or Section 8 assistance under § 58.1(b)(6)(iii), a public housing agency;
    - (vi) Any direct grantee of HUD for a special project under § 58.1(b)(7);
    - (vii) With respect to the FHA Multifamily Housing Finance Agency Program under 58.1(b)(8), a qualified housing finance agency;
    - (viii) With respect to the Self-Help Homeownership Opportunity Program under § 58.1(b)(9), any direct grantee of HUD.
    - (ix)
      - (A) With respect to NAHASDA assistance under § 58.1(b)(10), the Indian tribe or the Department of Hawaiian Home Lands; and
      - (B) With respect to the Section 184 Indian Housing Loan Guarantee program under § 58.1(b)(11), the Indian tribe.
    - (x) With respect to the Shelter Plus Care and Supportive Housing Programs under § 58.1(b)(3)(ii), nonprofit organizations and other entities.
  - (6) **Release of funds.** In the case of the FHA Multifamily Housing Finance Agency Program under § 58.1(b)(8), Release of Funds, as used in this part, refers to HUD issuance of a firm approval letter, and Request for Release of Funds refers to a recipient's request for a firm approval letter. In the case of the Section 184 Indian Housing Loan Guarantee program under § 58.1(b)(11), Release of Funds

refers to HUD's issuance of a commitment to guarantee a loan, or if there is no commitment, HUD's issuance of a certificate of guarantee.

- (7) **Responsible Entity.** Responsible Entity means:
- (i) With respect to environmental responsibilities under programs listed in § 58.1(b)(1), (2), (3)(i), (4), and (5), a recipient under the program.
  - (ii) With respect to environmental responsibilities under the programs listed in § 58.1(b)(3)(ii) and (6) through (12), a state, unit of general local government, Indian tribe or Alaska Native Village, or the Department of Hawaiian Home Lands, when it is the recipient under the program. Under the Native American Housing Assistance and Self-Determination Act of 1996 (25 U.S.C. 4101 *et seq.*) listed in § 58.1(b)(10)(i), the Indian tribe is the responsible entity whether or not a Tribally Designated Housing Entity is authorized to receive grant amounts on behalf of the tribe. The Indian tribe is also the responsible entity under the Section 184 Indian Housing Loan Guarantee program listed in § 58.1(b)(11). Regional Corporations in Alaska are considered Indian tribes in this part. Non-recipient responsible entities are designated as follows:
    - (A) For qualified housing finance agencies, the State or a unit of general local government, Indian tribe or Alaska native village whose jurisdiction contains the project site;
    - (B) For public housing agencies, the unit of general local government within which the project is located that exercises land use responsibility, or if HUD determines this infeasible, the county, or if HUD determines this infeasible, the State;
    - (C) For non-profit organizations and other entities, the unit of general local government, Indian tribe or Alaska native village within which the project is located that exercises land use responsibility, or if HUD determines this infeasible, the county, or if HUD determines this infeasible, the State;
- (8) **Unit Density** refers to a change in the number of dwelling units. Where a threshold is identified as a percentage change in density that triggers review requirements, no distinction is made between an increase or a decrease in density.
- (9) **Tiering** means the evaluation of an action or an activity at various points in the development process as a proposal or event becomes ripe for an Environment Assessment or Review.
- (10) **Vacant Building** means a habitable structure that has been vacant for more than one year.
- (b) The following abbreviations are used throughout this part:
- (1) CDBG - Community Development Block Grant;
  - (2) CEQ - Council on Environmental Quality;
  - (3) EA - Environmental Assessment;
  - (4) EIS - Environmental Impact Statement;
  - (5) EPA - Environmental Protection Agency;
  - (6) ERR - Environmental Review Record;
  - (7) FONSI - Finding of No Significant Impact;
  - (8) HUD - Department of Housing and Urban Development;
  - (9) NAHA - Cranston-Gonzalez National Affordable Housing Act of 1990;
  - (10) NEPA - National Environmental Policy Act of 1969, as amended;
  - (11) NOI/EIS - Notice of Intent to Prepare an EIS;
  - (12) NOI/RROF - Notice of Intent to Request Release of Funds;
  - (13) ROD - Record of Decision;
  - (14) ROF - Release of Funds; and
  - (15) RROF - Request for Release of Funds.

[61 FR 19122, Apr. 30, 1996, as amended at 68 FR 56128, Sept. 29, 2003]

#### § 58.4 Assumption authority.

- (a) **Assumption authority for responsible entities: General.** Responsible entities shall assume the responsibility for environmental review, decision-making, and action that would otherwise apply to HUD under NEPA and other provisions of law that further the purposes of NEPA, as specified in § 58.5. Responsible entities that receive assistance directly from HUD assume these responsibilities by execution of a grant agreement with HUD and/or a legally binding document such as the certification contained on HUD Form 7015.15, certifying to the assumption of environmental responsibilities. When a State distributes funds to a responsible entity, the State must provide for appropriate procedures by which these responsible entities will evidence their assumption of environmental responsibilities.
- (b) **Particular responsibilities of the States.**

- (1) States are recipients for purposes of directly undertaking a State project and must assume the environmental review responsibilities for the State's activities and those of any non-governmental entity that may participate in the project. In this case, the State must submit the certification and RROF to HUD for approval.
  - (2) States must exercise HUD's responsibilities in accordance with § 58.18, with respect to approval of a unit of local government's environmental certification and RROF for a HUD assisted project funded through the state. Approval by the state of a unit of local government's certification and RROF satisfies the Secretary's responsibilities under NEPA and the related laws cited in § 58.5.
- (c) **Particular responsibilities of Indian tribes.** An Indian tribe may, but is not required to, assume responsibilities for environmental review, decision-making and action for programs authorized by the Native American Housing Assistance and Self-Determination Act of 1996 (25 U.S.C. 4101 *et seq.*) (other than title VIII) or section 184 of the Housing and Community Development Act of 1992 (12 U.S.C. 1715z-13a). The tribe must make a separate decision regarding assumption of responsibilities for each of these Acts and communicate that decision in writing to HUD. If the tribe assumes these responsibilities, the requirements of this part shall apply. If a tribe formally declines assumption of these responsibilities, they are retained by HUD and the provisions of part 50 of this title apply.

[61 FR 19122, Apr. 30, 1996, as amended at 68 FR 56128, Sept. 29, 2003]

### § 58.5 Related Federal laws and authorities.

In accordance with the provisions of law cited in § 58.1(b), the responsible entity must assume responsibilities for environmental review, decision-making and action that would apply to HUD under the following specified laws and authorities. The responsible entity must certify that it has complied with the requirements that would apply to HUD under these laws and authorities and must consider the criteria, standards, policies and regulations of these laws and authorities.

(a) **Historic properties.**

- (1) The National Historic Preservation Act of 1966 (16 U.S.C. 470 *et seq.*), particularly sections 106 and 110 (16 U.S.C. 470 and 470h-2).
- (2) Executive Order 11593, Protection and Enhancement of the Cultural Environment, May 13, 1971 (36 FR 8921), 3 CFR 1971-1975 Comp., p. 559, particularly section 2(c).
- (3) Federal historic preservation regulations as follows:
  - (i) 36 CFR part 800 with respect to HUD programs other than Urban Development Action Grants (UDAG); and
  - (ii) 36 CFR part 801 with respect to UDAG.
- (4) The Reservoir Salvage Act of 1960 as amended by the Archeological and Historic Preservation Act of 1974 (16 U.S.C. 469 *et seq.*), particularly section 3 (16 U.S.C. 469a-1).

(b) **Floodplain management and wetland protection.**

- (1) Executive Order 11988, Floodplain Management, May 24, 1977 (42 FR 26951), 3 CFR, 1977 Comp., p. 117, as interpreted in HUD regulations at 24 CFR part 55, particularly section 2(a) of the order (For an explanation of the relationship between the decision-making process in 24 CFR part 55 and this part, see § 55.10 of this subtitle A.)
- (2) Executive Order 11990, Protection of Wetlands, May 24, 1977 (42 FR 26961), 3 CFR, 1977 Comp., p. 121, as interpreted in HUD regulations at 24 CFR part 55, particularly sections 2 and 5 of the order.

(c) **Coastal Zone Management.** The Coastal Zone Management Act of 1972 (16 U.S.C. 1451 *et seq.*), as amended, particularly section 307(c) and (d) (16 U.S.C. 1456(c) and (d)).

(d) **Sole source aquifers.**

- (1) The Safe Drinking Water Act of 1974 (42 U.S.C. 201, 300(f) *et seq.*, and 21 U.S.C. 349) as amended; particularly section 1424(e)(42 U.S.C. 300h-3(e)).
- (2) Sole Source Aquifers (Environmental Protection Agency - 40 CFR part 149).

(e) **Endangered species.** The Endangered Species Act of 1973 (16 U.S.C. 1531 *et seq.*) as amended, particularly section 7 (16 U.S.C. 1536).

(f) **Wild and scenic rivers.** The Wild and Scenic Rivers Act of 1968 (16 U.S.C. 1271 *et seq.*) as amended, particularly section 7(b) and (c) (16 U.S.C. 1278(b) and (c)).

(g) **Air quality.**

- (1) The Clean Air Act (42 U.S.C. 7401 *et seq.*) as amended; particularly section 176(c) and (d) (42 U.S.C. 7506(c) and (d)).
- (2) Determining Conformity of Federal Actions to State or Federal Implementation Plans (Environmental Protection Agency - 40 CFR parts 6, 51, and 93).

(h) **Farmlands protection.**

- (1) Farmland Protection Policy Act of 1981 (7 U.S.C. 4201 *et seq.*) particularly sections 1540(b) and 1541 (7 U.S.C. 4201(b) and 4202).
- (2) Farmland Protection Policy (Department of Agriculture - 7 CFR part 658).

(i) **HUD environmental standards.**

- (1) Applicable criteria and standards specified in part 51 of this title, other than the runway clear zone notification requirement in § 51.303(a)(3).
- (2)
  - (i) Also, it is HUD policy that all properties that are being proposed for use in HUD programs be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of occupants or conflict with the intended utilization of the property.
  - (ii) The environmental review of multifamily housing with five or more dwelling units (including leasing), or non-residential property, must include the evaluation of previous uses of the site or other evidence of contamination on or near the site, to ensure that the occupants of proposed sites are not adversely affected by any of the hazards listed in paragraph (i)(2)(i) of this section.
  - (iii) Particular attention should be given to any proposed site on or in the general proximity of such areas as dumps, landfills, industrial sites, or other locations that contain, or may have contained, hazardous wastes.
  - (iv) The responsible entity shall use current techniques by qualified professionals to undertake investigations determined necessary.
- (j) **Environmental justice.** Executive Order 12898 - Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, February 11, 1994 (59 FR 7629), 3 CFR, 1994 Comp. p. 859.

[61 FR 19122, Apr. 30, 1996, as amended at 68 FR 56128, Sept. 29, 2003; 78 FR 68734, Nov. 15, 2013]

**§ 58.6 Other requirements.**

In addition to the duties under the laws and authorities specified in § 58.5 for assumption by the responsible entity under the laws cited in § 58.1(b), the responsible entity must comply with the following requirements. Applicability of the following requirements does not trigger the certification and release of funds procedure under this part or preclude exemption of an activity under § 58.34(a)(12) and/or the applicability of § 58.35(b). However, the responsible entity remains responsible for addressing the following requirements in its ERR and meeting these requirements, where applicable, regardless of whether the activity is exempt under § 58.34 or categorically excluded under § 58.35(a) or (b).

- (a)
  - (1) Under the Flood Disaster Protection Act of 1973, as amended (42 U.S.C. 4001-4128), Federal financial assistance for acquisition and construction purposes (including rehabilitation) may not be used in an area identified by the Federal Emergency Management Agency (FEMA) as having special flood hazards, unless:
    - (i) The community in which the area is situated is participating in the National Flood Insurance Program (see 44 CFR parts 59 through 79), or less than one year has passed since the FEMA notification regarding such hazards; and
    - (ii) Where the community is participating in the National Flood Insurance Program, flood insurance protection is to be obtained as a condition of the approval of financial assistance to the property owner.
  - (2) Where the community is participating in the National Flood Insurance Program and the recipient provides financial assistance for acquisition or construction purposes (including rehabilitation) for property located in an area identified by FEMA as having special flood hazards, the responsible entity is responsible for assuring that flood insurance under the National Flood Insurance Program is obtained and maintained.
  - (3) Paragraph (a) of this section does not apply to Federal formula grants made to a State.
  - (4) Flood insurance requirements cannot be fulfilled by self-insurance except as authorized by law for assistance to state-owned projects within states approved by the Federal Insurance Administrator consistent with 44 CFR 75.11.
- (b) Under section 582 of the National Flood Insurance Reform Act of 1994, 42 U.S.C. 5154a, HUD disaster assistance that is made available in a special flood hazard area may not be used to make a payment (including any loan assistance payment) to a person for repair, replacement or restoration for flood damage to any personal, residential or commercial property if:
  - (1) The person had previously received Federal flood disaster assistance conditioned on obtaining and maintaining flood insurance; and
  - (2) The person failed to obtain and maintain flood insurance.
- (c) Pursuant to the Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 (16 U.S.C. 3501), HUD assistance may not be used for most activities proposed in the Coastal Barrier Resources System.
- (d) In all cases involving HUD assistance, subsidy, or insurance for the purchase or sale of an existing property in a Runway Clear Zone or Clear Zone, as defined in 24 CFR part 51, the responsible entity shall advise the buyer that the property is in a runway clear zone or clear zone, what the implications of such a location are, and that there is a possibility that the property may, at a later date, be acquired by the airport operator. The buyer must sign a statement acknowledging receipt of this information.

[61 FR 19122, Apr. 30, 1996, as amended at 63 FR 15271, Mar. 30, 1998; 78 FR 68734, Nov. 15, 2013]

**Subpart B - General Policy: Responsibilities of Responsible Entities****§ 58.10 Basic environmental responsibility.**

In accordance with the provisions of law cited in § 58.1(b), except as otherwise provided in § 58.4(c), the responsible entity must assume the environmental responsibilities for projects under programs cited in § 58.1(b). In doing so, the responsible entity must comply with the provisions of NEPA and the CEQ regulations contained in 40 CFR parts 1500 through 1508, including the requirements set forth in this part.

*[68 FR 56128, Sept. 29, 2003]*

**§ 58.11 Legal capacity and performance.**

- (a) A responsible entity which believes that it does not have the legal capacity to carry out the environmental responsibilities required by this part must contact the appropriate local HUD Office or the State for further instructions. Determinations of legal capacity will be made on a case-by-case basis.
- (b) If a public housing, special project, HOPWA, Supportive Housing, Shelter Plus Care, or Self-Help Homeownership Opportunity recipient that is not a responsible entity objects to the non-recipient responsible entity conducting the environmental review on the basis of performance, timing, or compatibility of objectives, HUD will review the facts to determine who will perform the environmental review.
- (c) At any time, HUD may reject the use of a responsible entity to conduct the environmental review in a particular case on the basis of performance, timing or compatibility of objectives, or in accordance with § 58.77(d)(1).
- (d) If a responsible entity, other than a recipient, objects to performing an environmental review, or if HUD determines that the responsible entity should not perform the environmental review, HUD may designate another responsible entity to conduct the review in accordance with this part or may itself conduct the environmental review in accordance with the provisions of 24 CFR part 50.

*[61 FR 19122, Apr. 30, 1996, as amended at 68 FR 56129, Sept. 29, 2003]*

**§ 58.12 Technical and administrative capacity.**

The responsible entity must develop the technical and administrative capability necessary to comply with 40 CFR parts 1500 through 1508 and the requirements of this part.

**§ 58.13 Responsibilities of the certifying officer.**

Under the terms of the certification required by § 58.71, a responsible entity's certifying officer is the "responsible Federal official" as that term is used in section 102 of NEPA and in statutory provisions cited in § 58.1(b). The Certifying Officer is therefore responsible for all the requirements of section 102 of NEPA and the related provisions in 40 CFR parts 1500 through 1508, and 24 CFR part 58, including the related Federal authorities listed in § 58.5. The Certifying Officer must also:

- (a) Represent the responsible entity and be subject to the jurisdiction of the Federal courts. The Certifying Officer will not be represented by the Department of Justice in court; and
- (b) Ensure that the responsible entity reviews and comments on all EISs prepared for Federal projects that may have an impact on the recipient's program.

**§ 58.14 Interaction with State, Federal and non-Federal entities.**

A responsible entity shall consult with appropriate environmental agencies, State, Federal and non-Federal entities and the public in the preparation of an EIS, EA or other environmental reviews undertaken under the related laws and authorities cited in § 58.5 and § 58.6. The responsible entity must also cooperate with other agencies to reduce duplication between NEPA and comparable environmental review requirements of the State (see 40 CFR 1506.2 (b) and (c)). The responsible entity must prepare its EAs and EISs so that they comply with the environmental review requirements of both Federal and State laws unless otherwise specified or provided by law. State, Federal and local agencies may participate or act in a joint lead or cooperating agency capacity in the preparation of joint EISs or joint environmental assessments (see 40 CFR 1501.5(b) and 1501.6). A single EIS or EA may be prepared and adopted by multiple users to the extent that the review addresses the relevant environmental issues and there is a written agreement between the cooperating agencies which sets forth the coordinated and overall responsibilities.

*[63 FR 15271, Mar. 30, 1998]*

**§ 58.15 Tiering.**

Responsible entities may tier their environmental reviews and assessments to eliminate repetitive discussions of the same issues at subsequent levels of review. Tiering is appropriate when there is a requirement to evaluate a policy or proposal in the early stages of development or when site-specific analysis or mitigation is not currently feasible and a more narrow or focused analysis is better done at a later date. The site specific review need only reference or summarize the issues addressed in the broader review. The broader review should identify and evaluate those issues ripe for decision and exclude those issues not relevant to the policy, program or project under consideration. The broader review should also establish the policy, standard or process to be followed in the site specific review. The Finding of No Significant Impact (FONSI) with respect to the broader assessment shall include a summary of the assessment and identify the significant issues to be considered in site specific reviews. Subsequent

site-specific reviews will not require notices or a Request for Release of Funds unless the Certifying Officer determines that there are unanticipated impacts or impacts not adequately addressed in the prior review. A tiering approach can be used for meeting environmental review requirements in areas designated for special focus in local Consolidated Plans. Local and State Governments are encouraged to use the Consolidated Plan process to facilitate environmental reviews.

### § 58.17 [Reserved]

### § 58.18 Responsibilities of States assuming HUD environmental responsibilities.

States that elect to administer a HUD program shall ensure that the program complies with the provisions of this part. The state must:

- (a) Designate the state agency or agencies that will be responsible for carrying out the requirements and administrative responsibilities set forth in subpart H of this part and which will:
  - (1) Develop a monitoring and enforcement program for post-review actions on environmental reviews and monitor compliance with any environmental conditions included in the award.
  - (2) Receive public notices, RROFs, and certifications from recipients pursuant to §§ 58.70 and 58.71; accept objections from the public and from other agencies (§ 58.73); and perform other related responsibilities regarding releases of funds.
- (b) Fulfill the state role in subpart H relative to the time period set for the receipt and disposition of comments, objections and appeals (if any) on particular projects.

[68 FR 56129, Sept. 29, 2003]

### Subpart C - General Policy: Environmental Review Procedures

#### § 58.21 Time periods.

All time periods in this part shall be counted in calendar days. The first day of a time period begins at 12:01 a.m. local time on the day following the publication or the mailing and posting date of the notice which initiates the time period.

#### § 58.22 Limitations on activities pending clearance.

- (a) Neither a recipient nor any participant in the development process, including public or private nonprofit or for-profit entities, or any of their contractors, may commit HUD assistance under a program listed in § 58.1(b) on an activity or project until HUD or the state has approved the recipient's RROF and the related certification from the responsible entity. In addition, until the RROF and the related certification have been approved, neither a recipient nor any participant in the development process may commit non-HUD funds on or undertake an activity or project under a program listed in § 58.1(b) if the activity or project would have an adverse environmental impact or limit the choice of reasonable alternatives.
- (b) If a project or activity is exempt under § 58.34, or is categorically excluded (except in extraordinary circumstances) under § 58.35(b), no RROF is required and the recipient may undertake the activity immediately after the responsible entity has documented its determination as required in § 58.34(b) and § 58.35(d), but the recipient must comply with applicable requirements under § 58.6.
- (c) If a recipient is considering an application from a prospective subrecipient or beneficiary and is aware that the prospective subrecipient or beneficiary is about to take an action within the jurisdiction of the recipient that is prohibited by paragraph (a) of this section, then the recipient will take appropriate action to ensure that the objectives and procedures of NEPA are achieved.
- (d) An option agreement on a proposed site or property is allowable prior to the completion of the environmental review if the option agreement is subject to a determination by the recipient on the desirability of the property for the project as a result of the completion of the environmental review in accordance with this part and the cost of the option is a nominal portion of the purchase price. There is no constraint on the purchase of an option by third parties that have not been selected for HUD funding, have no responsibility for the environmental review and have no say in the approval or disapproval of the project.
- (e) **Self-Help Homeownership Opportunity Program (SHOP).** In accordance with section 11(d)(2)(A) of the Housing Opportunity Program Extension Act of 1996 (42 U.S.C. 12805 note), an organization, consortium, or affiliate receiving assistance under the SHOP program may advance nongrant funds to acquire land prior to completion of an environmental review and approval of a Request for Release of Funds (RROF) and certification, notwithstanding paragraph (a) of this section. Any advances to acquire land prior to approval of the RROF and certification are made at the risk of the organization, consortium, or affiliate and reimbursement for such advances may depend on the result of the environmental review. This authorization is limited to the SHOP program only and all other forms of HUD assistance are subject to the limitations in paragraph (a) of this section.
- (f) **Relocation.** Funds may be committed for relocation assistance before the approval of the RROF and related certification for the project provided that the relocation assistance is required by 24 CFR part 42.

[68 FR 56129, Sept. 29, 2003]

#### § 58.23 Financial assistance for environmental review.

The costs of environmental reviews, including costs incurred in complying with any of the related laws and authorities cited in § 58.5 and § 58.6, are eligible costs to the extent allowable under the HUD assistance program regulations.

## Subpart D - Environmental Review Process: Documentation, Range of Activities, Project Aggregation and Classification

### § 58.30 Environmental review process.

- (a) The environmental review process consists of all the actions that a responsible entity must take to determine compliance with this part. The environmental review process includes all the compliance actions needed for other activities and projects that are not assisted by HUD but are aggregated by the responsible entity in accordance with § 58.32.
- (b) The environmental review process should begin as soon as a recipient determines the projected use of HUD assistance.

### § 58.32 Project aggregation.

- (a) A responsible entity must group together and evaluate as a single project all individual activities which are related either on a geographical or functional basis, or are logical parts of a composite of contemplated actions.
- (b) In deciding the most appropriate basis for aggregation when evaluating activities under more than one program, the responsible entity may choose: *functional aggregation* when a specific type of activity (e.g., water improvements) is to take place in several separate locales or jurisdictions; *geographic aggregation* when a mix of dissimilar but related activities is to be concentrated in a fairly specific project area (e.g., a combination of water, sewer and street improvements and economic development activities); or a *combination of aggregation approaches*, which, for various project locations, considers the impacts arising from each functional activity and its interrelationship with other activities.
- (c) The purpose of project aggregation is to group together related activities so that the responsible entity can:
  - (1) Address adequately and analyze, in a single environmental review, the separate and combined impacts of activities that are similar, connected and closely related, or that are dependent upon other activities and actions. (See 40 CFR 1508.25(a)).
  - (2) Consider reasonable alternative courses of action.
  - (3) Schedule the activities to resolve conflicts or mitigate the individual, combined and/or cumulative effects.
  - (4) Prescribe mitigation measures and safeguards including project alternatives and modifications to individual activities.
- (d) **Multi-year project aggregation** -
  - (1) **Release of funds.** When a recipient's planning and program development provide for activities to be implemented over two or more years, the responsible entity's environmental review should consider the relationship among all component activities of the multi-year project regardless of the source of funds and address and evaluate their cumulative environmental effects. The estimated range of the aggregated activities and the estimated cost of the total project must be listed and described by the responsible entity in the environmental review and included in the RROF. The release of funds will cover the entire project period.
  - (2) When one or more of the conditions described in § 58.47 exists, the recipient or other responsible entity must re-evaluate the environmental review.

### § 58.33 Emergencies.

- (a) In the cases of emergency, disaster or imminent threat to health and safety which warrant the taking of an action with significant environmental impact, the provisions of 40 CFR 1506.11 shall apply.
- (b) If funds are needed on an emergency basis and adherence to separate comment periods would prevent the giving of assistance during a Presidentially declared disaster, or during a local emergency that has been declared by the chief elected official of the responsible entity who has proclaimed that there is an immediate need for public action to protect the public safety, the combined Notice of FONSI and Notice of Intent to Request Release of Funds (NOI/RROF) may be disseminated and/or published simultaneously with the submission of the RROF. The combined Notice of FONSI and NOI/RROF shall state that the funds are needed on an emergency basis due to a declared disaster and that the comment periods have been combined. The Notice shall also invite commenters to submit their comments to both HUD and the responsible entity issuing the notice to ensure that these comments will receive full consideration.

[61 FR 19122, Apr. 30, 1996, as amended at 68 FR 56129, Sept. 29, 2003]

### § 58.34 Exempt activities.

- (a) Except for the applicable requirements of § 58.6, the responsible entity does not have to comply with the requirements of this part or undertake any environmental review, consultation or other action under NEPA and the other provisions of law or authorities cited in § 58.5 for the activities exempt by this section or projects consisting solely of the following exempt activities:
  - (1) Environmental and other studies, resource identification and the development of plans and strategies;
  - (2) Information and financial services;
  - (3) Administrative and management activities;

- (4) Public services that will not have a physical impact or result in any physical changes, including but not limited to services concerned with employment, crime prevention, child care, health, drug abuse, education, counseling, energy conservation and welfare or recreational needs;
  - (5) Inspections and testing of properties for hazards or defects;
  - (6) Purchase of insurance;
  - (7) Purchase of tools;
  - (8) Engineering or design costs;
  - (9) Technical assistance and training;
  - (10) Assistance for temporary or permanent improvements that do not alter environmental conditions and are limited to protection, repair, or restoration activities necessary only to control or arrest the effects from disasters or imminent threats to public safety including those resulting from physical deterioration;
  - (11) Payment of principal and interest on loans made or obligations guaranteed by HUD;
  - (12) Any of the categorical exclusions listed in § 58.35(a) provided that there are no circumstances which require compliance with any other Federal laws and authorities cited in § 58.5.
- (b) A recipient does not have to submit an RROF and certification, and no further approval from HUD or the State will be needed by the recipient for the drawdown of funds to carry out exempt activities and projects. However, the responsible entity must document in writing its determination that each activity or project is exempt and meets the conditions specified for such exemption under this section.

[61 FR 19122, Apr. 30, 1996, as amended at 63 FR 15271, Mar. 30, 1998]

### § 58.35 Categorical exclusions.

Categorical exclusion refers to a category of activities for which no environmental impact statement or environmental assessment and finding of no significant impact under NEPA is required, except in extraordinary circumstances (see § 58.2(a)(3)) in which a normally excluded activity may have a significant impact. Compliance with the other applicable Federal environmental laws and authorities listed in § 58.5 is required for any categorical exclusion listed in paragraph (a) of this section.

- (a) **Categorical exclusions subject to § 58.5.** The following activities are categorically excluded under NEPA, but may be subject to review under authorities listed in § 58.5:
- (1) Acquisition, repair, improvement, reconstruction, or rehabilitation of public facilities and improvements (other than buildings) when the facilities and improvements are in place and will be retained in the same use without change in size or capacity of more than 20 percent (e.g., replacement of water or sewer lines, reconstruction of curbs and sidewalks, repaving of streets).
  - (2) Special projects directed to the removal of material and architectural barriers that restrict the mobility of and accessibility to elderly and handicapped persons.
  - (3) Rehabilitation of buildings and improvements when the following conditions are met:
    - (i) In the case of a building for residential use (with one to four units), the density is not increased beyond four units, and the land use is not changed;
    - (ii) In the case of multifamily residential buildings:
      - (A) Unit density is not changed more than 20 percent;
      - (B) The project does not involve changes in land use from residential to non-residential; and
      - (C) The estimated cost of rehabilitation is less than 75 percent of the total estimated cost of replacement after rehabilitation.
    - (iii) In the case of non-residential structures, including commercial, industrial, and public buildings:
      - (A) The facilities and improvements are in place and will not be changed in size or capacity by more than 20 percent; and
      - (B) The activity does not involve a change in land use, such as from non-residential to residential, commercial to industrial, or from one industrial use to another.
  - (4)
    - (i) An individual action on up to four dwelling units where there is a maximum of four units on any one site. The units can be four one-unit buildings or one four-unit building or any combination in between; or
    - (ii) An individual action on a project of five or more housing units developed on scattered sites when the sites are more than 2,000 feet apart and there are not more than four housing units on any one site.
    - (iii) Paragraphs (a)(4)(i) and (ii) of this section do not apply to rehabilitation of a building for residential use (with one to four units) (see paragraph (a)(3)(i) of this section).

- (5) 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, financed, or disposed of will be retained for the same use.
- (6) Combinations of the above activities.
- (b) **Categorical exclusions not subject to § 58.5.** The Department has determined that the following categorically excluded activities would not alter any conditions that would require a review or compliance determination under the Federal laws and authorities cited in § 58.5. When the following kinds of activities are undertaken, the responsible entity does not have to publish a NOI/RROF or execute a certification and the recipient does not have to submit a RROF to HUD (or the State) except in the circumstances described in paragraph (c) of this section. Following the award of the assistance, no further approval from HUD or the State will be needed with respect to environmental requirements, except where paragraph (c) of this section applies. The recipient remains responsible for carrying out any applicable requirements under § 58.6.
  - (1) Tenant-based rental assistance;
  - (2) Supportive services including, but not limited to, health care, housing services, permanent housing placement, day care, nutritional services, short-term payments for rent/mortgage/utility costs, and assistance in gaining access to local, State, and Federal government benefits and services;
  - (3) Operating costs including maintenance, security, operation, utilities, furnishings, equipment, supplies, staff training and recruitment and other incidental costs;
  - (4) Economic development activities, including but not limited to, equipment purchase, inventory financing, interest subsidy, operating expenses and similar costs not associated with construction or expansion of existing operations;
  - (5) Activities to assist homebuyers to purchase existing dwelling units or dwelling units under construction, including closing costs and down payment assistance, interest buydowns, and similar activities that result in the transfer of title.
  - (6) Affordable housing 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, and other related activities which do not have a physical impact.
  - (7) Approval of supplemental assistance (including insurance or guarantee) to a project previously approved under this part, if the approval is made by the same responsible entity that conducted the environmental review on the original project and re-evaluation of the environmental findings is not required under § 58.47.
- (c) **Circumstances requiring NEPA review.** If a responsible entity determines that an activity or project identified in paragraph (a) or (b) of this section, because of extraordinary circumstances and conditions at or affecting the location of the activity or project, may have a significant environmental effect, it shall comply with all the requirements of this part.
- (d) The Environmental Review Record (ERR) must contain a well organized written record of the process and determinations made under this section.

[61 FR 19122, Apr. 30, 1996, as amended at 63 FR 15272, Mar. 30, 1998; 68 FR 56129, Sept. 29, 2003; 78 FR 68734, Nov. 15, 2013]

### § 58.36 Environmental assessments.

If a project is not exempt or categorically excluded under §§ 58.34 and 58.35, the responsible entity must prepare an EA in accordance with subpart E of this part. If it is evident without preparing an EA that an EIS is required under § 58.37, the responsible entity should proceed directly to an EIS.

### § 58.37 Environmental impact statement determinations.

- (a) An EIS is required when the project is determined to have a potentially significant impact on the human environment.
- (b) An EIS is required under any of the following circumstances, except as provided in paragraph (c) of this section:
  - (1) The project would provide a site or sites for, or result in the construction of, hospitals or nursing homes containing a total of 2,500 or more beds.
  - (2) The project would remove, demolish, convert or substantially rehabilitate 2,500 or more existing housing units (but not including rehabilitation projects categorically excluded under § 58.35), or would result in the construction or installation of 2,500 or more housing units, or would provide sites for 2,500 or more housing units.
  - (3) The project would provide enough additional water and sewer capacity to support 2,500 or more additional housing units. The project does not have to be specifically intended for residential use nor does it have to be totally new construction. If the project is designed to provide upgraded service to existing development as well as to serve new development, only that portion of the increased capacity which is intended to serve new development should be counted.
- (c) If, on the basis of an EA, a responsible entity determines that the thresholds in paragraph (b) of this section are the sole reason for the EIS, the responsible entity may prepare a FONSI pursuant to 40 CFR 1501.4. In such cases, the FONSI must be made available for public review for at least 30 days before the responsible entity makes the final determination whether to prepare an EIS.
- (d) Notwithstanding paragraphs (a) through (c) of this section, an EIS is not required where § 58.53 is applicable.

- (e) **Recommended EIS Format.** The responsible entity must use the EIS format recommended by the CEQ regulations (40 CFR 1502.10) unless a determination is made on a particular project that there is a compelling reason to do otherwise. In such a case, the EIS format must meet the minimum requirements prescribed in 40 CFR 1502.10.

### § 58.38 Environmental review record.

The responsible entity must maintain a written record of the environmental review undertaken under this part for each project. This document will be designated the "Environmental Review Record" (ERR) and shall be available for public review. The Departmental Environmental Clearance Officer (DECO) shall establish a prescribed format that the responsible entity shall use to prepare the ERR. The DECO may prescribe alternative formats as necessary to meet specific program needs.

- (a) **ERR Documents.** The ERR shall contain all the environmental review documents, public notices and written determinations or environmental findings required by this part as evidence of review, decisionmaking and actions pertaining to a particular project of a recipient. The document shall:
- (1) Describe the project and the activities that the recipient has determined to be part of the project;
  - (2) Evaluate the effects of the project or the activities on the human environment;
  - (3) Document compliance with applicable statutes and authorities, in particular those cited in § 58.5 and 58.6; and
  - (4) Record the written determinations and other review findings required by this part (e.g., exempt and categorically excluded projects determinations, findings of no significant impact).
- (b) **Other documents and information.** The ERR shall also contain verifiable source documents and relevant base data used or cited in EAs, EISs or other project review documents. These documents may be incorporated by reference into the ERR provided that each source document is identified and available for inspection by interested parties. Proprietary material and special studies prepared for the recipient that are not otherwise generally available for public review shall not be incorporated by reference but shall be included in the ERR.

[61 FR 19122, Apr. 30, 1996, as amended at 79 FR 49229, Aug. 20, 2014]

## Subpart E - Environmental Review Process: Environmental Assessments (EA's)

### § 58.40 Preparing the environmental assessment.

The DECO shall establish a prescribed format that the responsible entity shall use to prepare the EA. The DECO may prescribe alternative formats as necessary to meet specific program needs. In preparing an EA for a particular proposed project or other action, the responsible entity must:

- (a) Determine existing conditions and describe the character, features and resources of the project area and its surroundings; identify the trends that are likely to continue in the absence of the project.
- (b) Identify all potential environmental impacts, whether beneficial or adverse, and the conditions that would change as a result of the project.
- (c) Identify, analyze and evaluate all impacts to determine the significance of their effects on the human environment and whether the project will require further compliance under related laws and authorities cited in § 58.5 and § 58.6.
- (d) Examine and recommend feasible ways in which the project or external factors relating to the project could be modified in order to eliminate or minimize adverse environmental impacts.
- (e) Discuss the need for the proposal, appropriate alternatives where the proposal involves unresolved conflicts concerning alternative uses of available resources, the environmental impacts of the proposed action and alternatives, and a listing of agencies and persons consulted.
- (f) Complete all environmental review requirements necessary for the project's compliance with applicable authorities cited in §§ 58.5 and 58.6.
- (g) Based on steps set forth in paragraph (a) through (f) of this section, make one of the following findings:
  - (1) A Finding of No Significant Impact (FONSI), in which the responsible entity determines that the project is not an action that will result in a significant impact on the quality of the human environment. The responsible entity may then proceed to § 58.43.
  - (2) A finding of significant impact, in which the project is deemed to be an action which may significantly affect the quality of the human environment. The responsible entity must then proceed with its environmental review under subpart F or G of this part.

[61 FR 19122, Apr. 30, 1996, as amended at 79 FR 49229, Aug. 20, 2014]

### § 58.43 Dissemination and/or publication of the findings of no significant impact.

- (a) If the responsible entity makes a finding of no significant impact, it must prepare a FONSI notice, using the current HUD-recommended format or an equivalent format. As a minimum, the responsible entity must send the FONSI notice to individuals and groups known to be interested in the activities, to the local news media, to the appropriate tribal, local, State and Federal agencies; to the Regional Offices of

the Environmental Protection Agency having jurisdiction and to the HUD Field Office (or the State where applicable). The responsible entity may also publish the FONSI notice in a newspaper of general circulation in the affected community. If the notice is not published, it must also be prominently displayed in public buildings, such as the local Post Office and within the project area or in accordance with procedures established as part of the citizen participation process.

- (b) The responsible entity may disseminate or publish a FONSI notice at the same time it disseminates or publishes the NOI/RROF required by § 58.70. If the notices are released as a combined notice, the combined notice shall:
  - (1) Clearly indicate that it is intended to meet two separate procedural requirements; and
  - (2) Advise the public to specify in their comments which "notice" their comments address.
- (c) The responsible entity must consider the comments and make modifications, if appropriate, in response to the comments, before it completes its environmental certification and before the recipient submits its RROF. If funds will be used in Presidentially declared disaster areas, modifications resulting from public comment, if appropriate, must be made before proceeding with the expenditure of funds.

**§ 58.45 Public comment periods.**

Required notices must afford the public the following minimum comment periods, counted in accordance with § 58.21:

(a) Notice of Finding of No Significant Impact (FONSI)	15 days when published or, if no publication, 18 days when mailing and posting
(b) Notice of Intent to Request Release of Funds (NOI-RROF)	7 days when published or, if no publication, 10 days when mailing and posting
(c) Concurrent or combined notices	15 days when published or, if no publication, 18 days when mailing and posting

[68 FR 56130, Sept. 29, 2003]

**§ 58.46 Time delays for exceptional circumstances.**

The responsible entity must make the FONSI available for public comments for 30 days before the recipient files the RROF when:

- (a) There is a considerable interest or controversy concerning the project;
- (b) The proposed project is similar to other projects that normally require the preparation of an EIS; or
- (c) The project is unique and without precedent.

**§ 58.47 Re-evaluation of environmental assessments and other environmental findings.**

- (a) A responsible entity must re-evaluate its environmental findings to determine if the original findings are still valid, when:
  - (1) The recipient proposes substantial changes in the nature, magnitude or extent of the project, including adding new activities not anticipated in the original scope of the project;
  - (2) There are new circumstances and environmental conditions which may affect the project or have a bearing on its impact, such as concealed or unexpected conditions discovered during the implementation of the project or activity which is proposed to be continued; or
  - (3) The recipient proposes the selection of an alternative not in the original finding.
- (b)
  - (1) If the original findings are still valid but the data or conditions upon which they were based have changed, the responsible entity must affirm the original findings and update its ERR by including this re-evaluation and its determination based on its findings. Under these circumstances, if a FONSI notice has already been published, no further publication of a FONSI notice is required.
  - (2) If the responsible entity determines that the original findings are no longer valid, it must prepare an EA or an EIS if its evaluation indicates potentially significant impacts.
  - (3) Where the recipient is not the responsible entity, the recipient must inform the responsible entity promptly of any proposed substantial changes under paragraph (a)(1) of this section, new circumstances or environmental conditions under paragraph (a)(2) of this section, or any proposals to select a different alternative under paragraph (a)(3) of this section, and must then permit the responsible entity to re-evaluate the findings before proceeding.

[61 FR 19122, Apr. 30, 1996, as amended at 63 FR 15272, Mar. 30, 1998]

## Subpart F - Environmental Review Process: Environmental Impact Statement Determinations

### § 58.52 Adoption of other agencies' EISs.

The responsible entity may adopt a draft or final EIS prepared by another agency provided that the EIS was prepared in accordance with 40 CFR parts 1500 through 1508. If the responsible entity adopts an EIS prepared by another agency, the procedure in 40 CFR 1506.3 shall be followed. An adopted EIS may have to be revised and modified to adapt it to the particular environmental conditions and circumstances of the project if these are different from the project reviewed in the EIS. In such cases the responsible entity must prepare, circulate, and file a supplemental draft EIS in the manner prescribed in § 58.60(d) and otherwise comply with the clearance and time requirements of the EIS process, except that scoping requirements under 40 CFR 1501.7 shall not apply. The agency that prepared the original EIS should be informed that the responsible entity intends to amend and adopt the EIS. The responsible entity may adopt an EIS when it acts as a cooperating agency in its preparation under 40 CFR 1506.3. The responsible entity is not required to re-circulate or file the EIS, but must complete the clearance process for the RROF. The decision to adopt an EIS shall be made a part of the project ERR.

### § 58.53 Use of prior environmental impact statements.

Where any final EIS has been listed in the FEDERAL REGISTER for a project pursuant to this part, or where an areawide or similar broad scale final EIS has been issued and the EIS anticipated a subsequent project requiring an environmental clearance, then no new EIS is required for the subsequent project if all the following conditions are met:

- (a) The ERR contains a decision based on a finding pursuant to § 58.40 that the proposed project is not a new major Federal action significantly affecting the quality of the human environment. The decision shall include:
  - (1) References to the prior EIS and its evaluation of the environmental factors affecting the proposed subsequent action subject to NEPA;
  - (2) An evaluation of any environmental factors which may not have been previously assessed, or which may have significantly changed;
  - (3) An analysis showing that the proposed project is consistent with the location, use, and density assumptions for the site and with the timing and capacity of the circulation, utility, and other supporting infrastructure assumptions in the prior EIS;
  - (4) Documentation showing that where the previous EIS called for mitigating measures or other corrective action, these are completed to the extent reasonable given the current state of development.
- (b) The prior final EIS has been filed within five (5) years, and updated as follows:
  - (1) The EIS has been updated to reflect any significant revisions made to the assumptions under which the original EIS was prepared;
  - (2) The EIS has been updated to reflect new environmental issues and data or legislation and implementing regulations which may have significant environmental impact on the project area covered by the prior EIS.
- (c) There is no litigation pending in connection with the prior EIS, and no final judicial finding of inadequacy of the prior EIS has been made.

## Subpart G - Environmental Review Process: Procedures for Draft, Final and Supplemental Environmental Impact Statements

### § 58.55 Notice of intent to prepare an EIS.

As soon as practicable after the responsible entity decides to prepare an EIS, it must publish a NOI/EIS, using the HUD recommended format and disseminate it in the same manner as required by 40 CFR parts 1500 through 1508.

### § 58.56 Scoping process.

The determination on whether or not to hold a scoping meeting will depend on the same circumstances and factors as for the holding of public hearings under § 58.59. The responsible entity must wait at least 15 days after disseminating or publishing the NOI/EIS before holding a scoping meeting.

### § 58.57 Lead agency designation.

If there are several agencies ready to assume the lead role, the responsible entity must make its decision based on the criteria in 40 CFR 1501.5(c). If the responsible entity and a Federal agency are unable to reach agreement, then the responsible entity must notify HUD (or the State, where applicable). HUD (or the State) will assist in obtaining a determination based on the procedure set forth in 40 CFR 1501.5(e).

### § 58.59 Public hearings and meetings.

- (a) **Factors to consider.** In determining whether or not to hold public hearings in accordance with 40 CFR 1506.6, the responsible entity must consider the following factors:
  - (1) The magnitude of the project in terms of economic costs, the geographic area involved, and the uniqueness or size of commitment of resources involved.
  - (2) The degree of interest in or controversy concerning the project.

- (3) The complexity of the issues and the likelihood that information will be presented at the hearing which will be of assistance to the responsible entity.
- (4) The extent to which public involvement has been achieved through other means.
- (b) **Procedure.** All public hearings must be preceded by a notice of public hearing, which must be published in the local news media 15 days before the hearing date. The Notice must:
  - (1) State the date, time, place, and purpose of the hearing or meeting.
  - (2) Describe the project, its estimated costs, and the project area.
  - (3) State that persons desiring to be heard on environmental issues will be afforded the opportunity to be heard.
  - (4) State the responsible entity's name and address and the name and address of its Certifying Officer.
  - (5) State what documents are available, where they can be obtained, and any charges that may apply.

### **§ 58.60 Preparation and filing of environmental impact statements.**

- (a) The responsible entity must prepare the draft environmental impact statement (DEIS) and the final environmental impact statements (FEIS) using the current HUD recommended format or its equivalent.
- (b) The responsible entity must file and distribute the (DEIS) and the (FEIS) in the following manner:
  - (1) Five copies to EPA Headquarters;
  - (2) Five copies to EPA Regional Office;
  - (3) Copies made available in the responsible entity's and the recipient's office;
  - (4) Copies or summaries made available to persons who request them; and
  - (5) FEIS only - one copy to State, HUD Field Office, and HUD Headquarters library.
- (c) The responsible entity may request waivers from the time requirements specified for the draft and final EIS as prescribed in 40 CFR 1506.6.
- (d) When substantial changes are proposed in a project or when significant new circumstances or information becomes available during an environmental review, the recipient may prepare a supplemental EIS as prescribed in 40 CFR 1502.9.
- (e) The responsible entity must prepare a Record of Decision (ROD) as prescribed in 40 CFR 1505.2.

*[61 FR 19122, Apr. 30, 1996, as amended at 63 FR 15272, Mar. 30, 1998]*

## **Subpart H - Release of Funds for Particular Projects**

### **§ 58.70 Notice of intent to request release of funds.**

The NOI/RROF must be disseminated and/or published in the manner prescribed by § 58.43 and § 58.45 before the certification is signed by the responsible entity.

### **§ 58.71 Request for release of funds and certification.**

- (a) The RROF and certification shall be sent to the appropriate HUD Field Office (or the State, if applicable), except as provided in paragraph (b) of this section. This request shall be executed by the Certifying Officer. The request shall describe the specific project and activities covered by the request and contain the certification required under the applicable statute cited in § 58.1(b). The RROF and certification must be in a form specified by HUD.
- (b) When the responsible entity is conducting an environmental review on behalf of a recipient, as provided for in § 58.10, the recipient must provide the responsible entity with all available project and environmental information and refrain from undertaking any physical activities or choice limiting actions until HUD (or the State, if applicable) has approved its request for release of funds. The certification form executed by the responsible entity's certifying officer shall be sent to the recipient that is to receive the assistance along with a description of any special environmental conditions that must be adhered to in carrying out the project. The recipient is to submit the RROF and the certification of the responsible entity to HUD (or the State, if applicable) requesting the release of funds. The recipient must agree to abide by the special conditions, procedures and requirements of the environmental review, and to advise the responsible entity of any proposed change in the scope of the project or any change in environmental conditions.
- (c) If the responsible entity determines that some of the activities are exempt under applicable provisions of this part, the responsible entity shall advise the recipient that it may commit funds for these activities as soon as programmatic authorization is received. This finding shall be documented in the ERR maintained by the responsible entity and in the recipient's project files.

### **§ 58.72 HUD or State actions on RROFs and certifications.**

The actions which HUD (or a State) may take with respect to a recipient's environmental certification and RROF are as follows:

- (a) In the absence of any receipt of objection to the contrary, except as provided in paragraph (b) of this section, HUD (or the State) will assume the validity of the certification and RROF and will approve these documents after expiration of the 15-day period prescribed by statute.
- (b) HUD (or the state) may disapprove a certification and RROF if it has knowledge that the responsible entity or other participants in the development process have not complied with the items in § 58.75, or that the RROF and certification are inaccurate.
- (c) In cases in which HUD has approved a certification and RROF but subsequently learns (e.g., through monitoring) that the recipient violated § 58.22 or the recipient or responsible entity otherwise failed to comply with a clearly applicable environmental authority, HUD shall impose appropriate remedies and sanctions in accord with the law and regulations for the program under which the violation was found.

[61 FR 19122, Apr. 30, 1996, as amended at 68 FR 56130, Sept. 29, 2003]

### **§ 58.73 Objections to release of funds.**

HUD (or the State) will not approve the ROF for any project before 15 calendar days have elapsed from the time of receipt of the RROF and the certification or from the time specified in the notice published pursuant to § 58.70, whichever is later. Any person or agency may object to a recipient's RROF and the related certification. However, the objections must meet the conditions and procedures set forth in subpart H of this part. HUD (or the State) can refuse the RROF and certification on any grounds set forth in § 58.75. All decisions by HUD (or the State) regarding the RROF and the certification shall be final.

### **§ 58.74 Time for objecting.**

All objections must be received by HUD (or the State) within 15 days from the time HUD (or the State) receives the recipient's RROF and the related certification, or within the time period specified in the notice, whichever is later.

### **§ 58.75 Permissible bases for objections.**

HUD (or the State), will consider objections claiming a responsible entity's noncompliance with this part based only on any of the following grounds:

- (a) The certification was not in fact executed by the responsible entity's Certifying Officer.
- (b) The responsible entity has failed to make one of the two findings pursuant to § 58.40 or to make the written determination required by §§ 58.35, 58.47 or 58.53 for the project, as applicable.
- (c) The responsible entity has omitted one or more of the steps set forth at subpart E of this part for the preparation, publication and completion of an EA.
- (d) The responsible entity has omitted one or more of the steps set forth at subparts F and G of this part for the conduct, preparation, publication and completion of an EIS.
- (e) The recipient or other participants in the development process have committed funds, incurred costs or undertaken activities not authorized by this part before release of funds and approval of the environmental certification by HUD (or the state).
- (f) Another Federal agency acting pursuant to 40 CFR part 1504 has submitted a written finding that the project is unsatisfactory from the standpoint of environmental quality.

[61 FR 19122, Apr. 30, 1996, as amended at 68 FR 56130, Sept. 29, 2003]

### **§ 58.76 Procedure for objections.**

A person or agency objecting to a responsible entity's RROF and certification shall submit objections in writing to HUD (or the State). The objections shall:

- (a) Include the name, address and telephone number of the person or agency submitting the objection, and be signed by the person or authorized official of an agency.
- (b) Be dated when signed.
- (c) Describe the basis for objection and the facts or legal authority supporting the objection.
- (d) State when a copy of the objection was mailed or delivered to the responsible entity's Certifying Officer.

### **§ 58.77 Effect of approval of certification.**

- (a) **Responsibilities of HUD and States.** HUD's (or, where applicable, the State's) approval of the certification shall be deemed to satisfy the responsibilities of the Secretary under NEPA and related provisions of law cited at § 58.5 insofar as those responsibilities relate to the release of funds as authorized by the applicable provisions of law cited in § 58.1(b).

- (b) **Public and agency redress.** Persons and agencies seeking redress in relation to environmental reviews covered by an approved certification shall deal with the responsible entity and not with HUD. It is HUD's policy to refer all inquiries and complaints to the responsible entity and its Certifying Officer. Similarly, the State (where applicable) may direct persons and agencies seeking redress in relation to environmental reviews covered by an approved certification to deal with the responsible entity, and not the State, and may refer inquiries and complaints to the responsible entity and its Certifying Officer. Remedies for noncompliance are set forth in program regulations.
- (c) **Implementation of environmental review decisions.** Projects of a recipient will require post-review monitoring and other inspection and enforcement actions by the recipient and the State or HUD (using procedures provided for in program regulations) to assure that decisions adopted through the environmental review process are carried out during project development and implementation.
- (d) **Responsibility for monitoring and training.**
- (1) At least once every three years, HUD intends to conduct in-depth monitoring and exercise quality control (through training and consultation) over the environmental activities performed by responsible entities under this part. Limited monitoring of these environmental activities will be conducted during each program monitoring site visit. If through limited or in-depth monitoring of these environmental activities or by other means, HUD becomes aware of any environmental deficiencies, HUD may take one or more of the following actions:
    - (i) In the case of problems found during limited monitoring, HUD may schedule in-depth monitoring at an earlier date or may schedule in-depth monitoring more frequently;
    - (ii) HUD may require attendance by staff of the responsible entity at HUD-sponsored or approved training, which will be provided periodically at various locations around the country;
    - (iii) HUD may refuse to accept the certifications of environmental compliance on subsequent grants;
    - (iv) HUD may suspend or terminate the responsible entity's assumption of the environmental review responsibility;
    - (v) HUD may initiate sanctions, corrective actions, or other remedies specified in program regulations or agreements or contracts with the recipient.
  - (2) HUD's responsibilities and action under paragraph (d)(1) of this section shall not be construed to limit or reduce any responsibility assumed by a responsible entity with respect to any particular release of funds under this part. Whether or not HUD takes action under paragraph (d)(1) of this section, the Certifying Officer remains the responsible Federal official under § 58.13 with respect to projects and activities for which the Certifying Officer has submitted a certification under this part.

# HUD Suggested Environmental Formats



# **Environmental Assessment Determinations and Compliance Findings for HUD-assisted Projects 24 CFR Part 58**

**This is a suggested format that may be used by Responsible Entities to document completion of an Environmental Assessment.**

## **Project Information**

**Project Name:**

**Responsible Entity:**

**Grant Recipient** (if different than Responsible Entity):

**State/Local Identifier:**

**Preparer:**

**Certifying Officer Name and Title:**

**Grant Recipient** (if different than Responsible Entity):

**Consultant** (if applicable):

**Direct Comments to:**

**Project Location:**

**Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:**

**Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:**

**Existing Conditions and Trends [24 CFR 58.40(a)]:**

**Funding Information**

Grant Number	HUD Program	Funding Amount

**Estimated Total HUD Funded Amount:**

**Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]:**

**Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities**

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

<b>Compliance Factors:</b> Statutes, Executive Orders,	Are formal compliance steps or	Compliance determinations

and Regulations listed at 24 CFR §58.5 and §58.6	mitigation required?	
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6</b>		
<b>Airport Hazards</b> 24 CFR Part 51 Subpart D	Yes No <input type="checkbox"/> <input type="checkbox"/>	
<b>Coastal Barrier Resources</b> Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes No <input type="checkbox"/> <input type="checkbox"/>	
<b>Flood Insurance</b> Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes No <input type="checkbox"/> <input type="checkbox"/>	
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 &amp; 58.5</b>		
<b>Clean Air</b> Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes No <input type="checkbox"/> <input type="checkbox"/>	
<b>Coastal Zone Management</b> Coastal Zone Management Act, sections 307(c) & (d)	Yes No <input type="checkbox"/> <input type="checkbox"/>	
<b>Contamination and Toxic Substances</b> 24 CFR Part 50.3(i) & 58.5(i)(2)	Yes No <input type="checkbox"/> <input type="checkbox"/>	
<b>Endangered Species</b> Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes No <input type="checkbox"/> <input type="checkbox"/>	
<b>Explosive and Flammable Hazards</b> 24 CFR Part 51 Subpart C	Yes No <input type="checkbox"/> <input type="checkbox"/>	

<p><b>Farmlands Protection</b></p> <p>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p>Yes No</p> <p><input type="checkbox"/> <input type="checkbox"/></p>	
<p><b>Floodplain Management</b></p> <p>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p>Yes No</p> <p><input type="checkbox"/> <input type="checkbox"/></p>	
<p><b>Historic Preservation</b></p> <p>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p>Yes No</p> <p><input type="checkbox"/> <input type="checkbox"/></p>	
<p><b>Noise Abatement and Control</b></p> <p>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p>Yes No</p> <p><input type="checkbox"/> <input type="checkbox"/></p>	
<p><b>Sole Source Aquifers</b></p> <p>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p>Yes No</p> <p><input type="checkbox"/> <input type="checkbox"/></p>	
<p><b>Wetlands Protection</b></p> <p>Executive Order 11990, particularly sections 2 and 5</p>	<p>Yes No</p> <p><input type="checkbox"/> <input type="checkbox"/></p>	
<p><b>Wild and Scenic Rivers</b></p> <p>Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p>	<p>Yes No</p> <p><input type="checkbox"/> <input type="checkbox"/></p>	
<p><b>ENVIRONMENTAL JUSTICE</b></p>		
<p><b>Environmental Justice</b></p> <p>Executive Order 12898</p>	<p>Yes No</p> <p><input type="checkbox"/> <input type="checkbox"/></p>	

**Environmental Assessment Factors** [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source

documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. **All conditions, attenuation or mitigation measures have been clearly identified.**

**Impact Codes:** Use an impact code from the following list to make the determination of impact for each factor.

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor Adverse Impact – May require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>LAND DEVELOPMENT</b>		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design		
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff		
Hazards and Nuisances including Site Safety and Noise		
Energy Consumption		

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>SOCIOECONOMIC</b>		
Employment and Income Patterns		
Demographic Character Changes, Displacement		

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>COMMUNITY FACILITIES AND SERVICES</b>		

Educational and Cultural Facilities		
Commercial Facilities		
Health Care and Social Services		
Solid Waste Disposal / Recycling		
Waste Water / Sanitary Sewers		
Water Supply		
Public Safety - Police, Fire and Emergency Medical		
Parks, Open Space and Recreation		
Transportation and Accessibility		

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>NATURAL FEATURES</b>		
Unique Natural Features, Water Resources		
Vegetation, Wildlife		
Other Factors		

**Additional Studies Performed:**

**Field Inspection** (Date and completed by):

**List of Sources, Agencies and Persons Consulted** [40 CFR 1508.9(b)]:

**List of Permits Obtained:**

**Public Outreach** [24 CFR 50.23 & 58.43]:

**Cumulative Impact Analysis** [24 CFR 58.32]:

**Alternatives** [24 CFR 58.40(e); 40 CFR 1508.9]

**No Action Alternative** [24 CFR 58.40(e)]:

**Summary of Findings and Conclusions:**

**Mitigation Measures and Conditions** [40 CFR 1505.2(c)]

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure

**Determination:**

**Finding of No Significant Impact** [24 CFR 58.40(g)(1); 40 CFR 1508.27]  
 The project will not result in a significant impact on the quality of the human environment.

**Finding of Significant Impact** [24 CFR 58.40(g)(2); 40 CFR 1508.27]  
 The project may significantly affect the quality of the human environment.

Preparer Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Name/Title/Organization: \_\_\_\_\_

\_\_\_\_\_  
 Certifying Officer Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Name/Title: \_\_\_\_\_

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).



The following Suggested Format was designed to be used by those “Partners” (including Public Housing Authorities, consultants, contractors, lenders, and nonprofits) who assist HUD in preparing environmental reviews, but legally cannot take full responsibilities for these reviews themselves.

### Categorically Excluded Subject to Section 50.4

#### Project Information

**Project Name:** [Click here to enter text.](#)

**Applicant/Grant Recipient:** [Click here to enter text.](#)

**Point of Contact:** [Click here to enter text.](#)

**HUD Preparer:** [Click here to enter text.](#)

**Consultant (if applicable):** [Click here to enter text.](#)

**Direct Comments to:** [Click here to enter text.](#)

**Does this project involve over 200 lots, dwelling units, or beds?**

- Yes (Project requires approval from the Environmental Clearance Officer (ECO))
- No

#### Funding Information

Grant Number	HUD Program	Funding Amount

**Estimated Total HUD Funded Amount:** [Click here to enter text.](#)

**Estimated Total Project Cost (HUD and non-HUD funds):** [Click here to enter text.](#)

**Project Location:**

Provide a street address or intersection for your project and validate the address using the button below. If the project affects a large area, such as an infrastructure or community services project, select a representative address and describe the project location in a narrative in the provided textbox. If the project location is sensitive, you may provide an alternative address, such as the address of your city hall or nonprofit in lieu of the exact location of the project.

[Click here to enter text.](#)

**Description of the Proposed Project** [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

Provide a project description that captures the maximum anticipated scope of the proposal. It should include all contemplated actions which logically are, either geographically or functionally, a composite part of the project, regardless of the source of funding. Describe all physical aspects of the project, such as plans for multiple phases of development, size and number of buildings, and activities to be undertaken. Include details of the physical impacts of the project, including whether there will be ground disturbance. If applicable, indicate whether the project site will require acquisition or if the sponsor already has ownership.

[Click here to enter text.](#)

**Categorical exclusion subject to the Federal laws and authorities cited in 24 CFR 50.4 (CEST)**

Select appropriate citation(s) from 24 CFR 50.20(a): (Check all that apply) -

- Special projects directed to the removal of material and architectural barriers that restrict the mobility of accessibility to elderly and persons with disabilities. 24 CFR 50.20(a)(1)
- Rehabilitation of buildings and improvements when the following conditions are met:
  - In the case of a building for residential use (with one to four units), the density is not increased beyond four units, the land use is not changed, and the footprint of the building is not increased in a floodplain or in a wetland. 24 CFR 50.20(a)(2)(i)
  - In the case of multifamily residential buildings: (A) Unit density is not changed more than 20 percent; (B) The project does not involve a change in land use from residential to non-residential; and (C) The estimated cost of rehabilitation is less than 75 percent of the total estimated cost of replacement after rehabilitation. 24 CFR 50.20(a)(2)(ii)
  - In the case of non-residential structures, including commercial, industrial, and public buildings: (A) The facilities and improvements are in place and will not be changed in size nor capacity by more than 20 percent; and (B) The activity does not involve a change in land use, such as from non-residential to residential, commercial to industrial, or from one industrial use to another. 24 CFR 50.20(a)(2)(iii)
- An individual action (not including rehabilitation) on up to four dwelling units where there is a maximum of four units on any one site. The units can be four one-unit buildings or one four-unit building or any combination in between. 24 CFR 50.20(a)(3)(i)

- An individual action (not including rehabilitation) on a project of five or more housing units developed on scattered sites when the sites are more than 2,000 feet apart and there are not more than four housing units on any one site. 24 CFR 50.20(a)(3)(ii)
- Equity loans on an existing structure, provided that the structure will be retained for the same use. 24 CFR 50.20(a)(4)
- Purchased or refinanced housing and medical facilities under section 223(f) of the National Housing Act (12 U.S.C. 1715n). 24 CFR 50.20(a)(5)
- Mortgage prepayments or plans of action (including incentives) under 24 CFR part 248. 24 CFR 50.20(a)(6)

**Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities**

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits or approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate. Related Law and Authority Worksheets can be found - <https://www.hudexchange.info/resource/4707/environmental-review-record-related-federal-laws-and-authorities-worksheets/>.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6</b>		
<b>Airport Hazards</b>  24 CFR Part 51 Subpart D	Yes    No <input type="checkbox"/> <input type="checkbox"/>	
<b>Coastal Barrier Resources</b>  Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes    No <input type="checkbox"/> <input type="checkbox"/>	
<b>Flood Insurance</b>  Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes    No <input type="checkbox"/> <input type="checkbox"/>	

<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 &amp; 58.5</b>		
<p><b>Clean Air</b></p> <p>Clean Air Act, as amended, particularly section 176(c) &amp; (d); 40 CFR Parts 6, 51, 93</p>	<p>Yes    No</p> <p><input type="checkbox"/>   <input type="checkbox"/></p>	
<p><b>Coastal Zone Management</b></p> <p>Coastal Zone Management Act, sections 307(c) &amp; (d)</p>	<p>Yes    No</p> <p><input type="checkbox"/>   <input type="checkbox"/></p>	
<p><b>Contamination and Toxic Substances</b></p> <p>24 CFR Part 50.3(i) &amp; 58.5(i)(2)</p>	<p>Yes    No</p> <p><input type="checkbox"/>   <input type="checkbox"/></p>	
<p><b>Endangered Species</b></p> <p>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p>Yes    No</p> <p><input type="checkbox"/>   <input type="checkbox"/></p>	
<p><b>Explosive and Flammable Hazards</b></p> <p>24 CFR Part 51 Subpart C</p>	<p>Yes    No</p> <p><input type="checkbox"/>   <input type="checkbox"/></p>	
<p><b>Farmlands Protection</b></p> <p>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p>Yes    No</p> <p><input type="checkbox"/>   <input type="checkbox"/></p>	
<p><b>Floodplain Management</b></p> <p>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p>Yes    No</p> <p><input type="checkbox"/>   <input type="checkbox"/></p>	
<p><b>Historic Preservation</b></p> <p>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p>Yes    No</p> <p><input type="checkbox"/>   <input type="checkbox"/></p>	
<p><b>Noise Abatement and Control</b></p> <p>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p>Yes    No</p> <p><input type="checkbox"/>   <input type="checkbox"/></p>	
<p><b>Sole Source Aquifers</b></p> <p>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p>Yes    No</p> <p><input type="checkbox"/>   <input type="checkbox"/></p>	

<p><b>Wetlands Protection</b></p> <p>Executive Order 11990, particularly sections 2 and 5</p>	<p>Yes    No</p> <p><input type="checkbox"/>   <input type="checkbox"/></p>	
<p><b>Wild and Scenic Rivers</b></p> <p>Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p>	<p>Yes    No</p> <p><input type="checkbox"/>   <input type="checkbox"/></p>	
<p><b>Environmental Justice</b></p> <p>Executive Order 12898</p>	<p>Yes    No</p> <p><input type="checkbox"/>   <input type="checkbox"/></p>	

**Mitigation Measures and Conditions [40 CFR 1505.2(c)]**

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure



The following Suggested Format was designed to be used by those “Partners” (including Public Housing Authorities, consultants, contractors, lenders, and nonprofits) who assist HUD in preparing environmental reviews, but legally cannot take full responsibilities for these reviews themselves.

**Categorically Excluded Subject to Section 50.4**

**Project Information**

**Project Name:**

**Applicant/Grant Recipient:**

**Point of Contact:**

**HUD Preparer:**

**Consultant (if applicable):**

**Direct Comments to:**

**Does this project involve over 200 lots, dwelling units, or beds?**

- Yes (Project requires approval from the Environmental Clearance Officer (ECO))
- No

**Funding Information**

Grant Number	HUD Program	Funding Amount

**Estimated Total HUD Funded Amount:**

**Estimated Total Project Cost (HUD and non-HUD funds):**

**Project Location:**

*Provide a street address or intersection for your project and validate the address using the button below. If the project affects a large area, such as an infrastructure or community services project, select a representative address and describe the project location in a narrative in the provided textbox. If the project location is sensitive, you may provide an alternative address, such as the address of your city hall or nonprofit in lieu of the exact location of the project.*

**Description of the Proposed Project** [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

*Provide a project description that captures the maximum anticipated scope of the proposal. It should include all contemplated actions which logically are, either geographically or functionally, a composite part of the project, regardless of the source of funding. Describe all physical aspects of the project, such as plans for multiple phases of development, size and number of buildings, and activities to be undertaken. Include details of the physical impacts of the project, including whether there will be ground disturbance. If applicable, indicate whether the project site will require acquisition or if the sponsor already has ownership.*

**Categorical exclusion subject to the Federal laws and authorities cited in 24 CFR 50.4 (CEST)**

Select appropriate citation(s) from 24 CFR 50.20(a): (Check all that apply) -

- Special projects directed to the removal of material and architectural barriers that restrict the mobility of accessibility to elderly and persons with disabilities. 24 CFR 50.20(a)(1)
- Rehabilitation of buildings and improvements when the following conditions are met:
  - In the case of a building for residential use (with one to four units), the density is not increased beyond four units, the land use is not changed, and the footprint of the building is not increased in a floodplain or in a wetland. 24 CFR 50.20(a)(2)(i)
  - In the case of multifamily residential buildings: (A) Unit density is not changed more than 20 percent; (B) The project does not involve a change in land use from residential to non-residential; and (C) The estimated cost of rehabilitation is less than 75 percent of the total estimated cost of replacement after rehabilitation. 24 CFR 50.20(a)(2)(ii)
  - In the case of non-residential structures, including commercial, industrial, and public buildings: (A) The facilities and improvements are in place and will not be changed in size nor capacity by more than 20 percent; and (B) The activity does not involve a change in land use, such as from non-residential to residential, commercial to industrial, or from one industrial use to another. 24 CFR 50.20(a)(2)(iii)
- An individual action (not including rehabilitation) on up to four dwelling units where there is a maximum of four units on any one site. The units can be four one-unit buildings or one four-unit building or any combination in between. 24 CFR 50.20(a)(3)(i)

- An individual action (not including rehabilitation) on a project of five or more housing units developed on scattered sites when the sites are more than 2,000 feet apart and there are not more than four housing units on any one site. 24 CFR 50.20(a)(3)(ii)
- Equity loans on an existing structure, provided that the structure will be retained for the same use. 24 CFR 50.20(a)(4)
- Purchased or refinanced housing and medical facilities under section 223(f) of the National Housing Act (12 U.S.C. 1715n). 24 CFR 50.20(a)(5)
- Mortgage prepayments or plans of action (including incentives) under 24 CFR part 248. 24 CFR 50.20(a)(6)

**Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities**

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits or approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate. Related Law and Authority Worksheets can be found - <https://www.hudexchange.info/resource/4707/environmental-review-record-related-federal-laws-and-authorities-worksheets/>.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6</b>		
<b>Airport Hazards</b>  24 CFR Part 51 Subpart D	Yes    No <input type="checkbox"/> <input type="checkbox"/>	
<b>Coastal Barrier Resources</b>  Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes    No <input type="checkbox"/> <input type="checkbox"/>	
<b>Flood Insurance</b>  Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes    No <input type="checkbox"/> <input type="checkbox"/>	

<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 &amp; 58.5</b>		
<b>Clean Air</b>  Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes <input type="checkbox"/>	No <input type="checkbox"/>
<b>Coastal Zone Management</b>  Coastal Zone Management Act, sections 307(c) & (d)	Yes <input type="checkbox"/>	No <input type="checkbox"/>
<b>Contamination and Toxic Substances</b>  24 CFR Part 50.3(i) & 58.5(i)(2)	Yes <input type="checkbox"/>	No <input type="checkbox"/>
<b>Endangered Species</b>  Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes <input type="checkbox"/>	No <input type="checkbox"/>
<b>Explosive and Flammable Hazards</b>  24 CFR Part 51 Subpart C	Yes <input type="checkbox"/>	No <input type="checkbox"/>
<b>Farmlands Protection</b>  Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes <input type="checkbox"/>	No <input type="checkbox"/>
<b>Floodplain Management</b>  Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes <input type="checkbox"/>	No <input type="checkbox"/>
<b>Historic Preservation</b>  National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes <input type="checkbox"/>	No <input type="checkbox"/>
<b>Noise Abatement and Control</b>  Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	Yes <input type="checkbox"/>	No <input type="checkbox"/>
<b>Sole Source Aquifers</b>  Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	Yes <input type="checkbox"/>	No <input type="checkbox"/>

<p><b>Wetlands Protection</b></p> <p>Executive Order 11990, particularly sections 2 and 5</p>	<p>Yes    No</p> <p><input type="checkbox"/>   <input type="checkbox"/></p>	
<p><b>Wild and Scenic Rivers</b></p> <p>Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p>	<p>Yes    No</p> <p><input type="checkbox"/>   <input type="checkbox"/></p>	
<p><b>Environmental Justice</b></p> <p>Executive Order 12898</p>	<p>Yes    No</p> <p><input type="checkbox"/>   <input type="checkbox"/></p>	

**Mitigation Measures and Conditions [40 CFR 1505.2(c)]**

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure



**Environmental Review for Activity/Project that is Categorically Excluded Subject to Section 58.5 Pursuant to 24 CFR 58.35(a)**

This is a suggested format that may be used by Responsible Entities to document completion of a Categorically Excluded Subject to Section 58.5 environmental review.

**Project Information**

**Project Name:**

**Responsible Entity:**

**Grant Recipient** (if different than Responsible Entity):

**State/Local Identifier:**

**Preparer:**

**Certifying Officer Name and Title:**

**Grant Recipient** (if different than Responsible Entity):

**Consultant** (if applicable):

**Direct Comments to:**

**Project Location:**

**Description of the Proposed Project** [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

**Level of Environmental Review Determination:**

Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at §58.5: \_\_\_\_\_

**Funding Information**

<b>Grant Number</b>	<b>HUD Program</b>	<b>Funding Amount</b>

**Estimated Total HUD Funded Amount:**

**Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]:**

**Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities**

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

<b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 &amp; 58.6</b>		
<b>Airport Hazards</b>  24 CFR Part 51 Subpart D	Yes    No <input type="checkbox"/> <input type="checkbox"/>	
<b>Coastal Barrier Resources</b>  Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes    No <input type="checkbox"/> <input type="checkbox"/>	
<b>Flood Insurance</b>  Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994	Yes    No <input type="checkbox"/> <input type="checkbox"/>	

[42 USC 4001-4128 and 42 USC 5154a]		
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 &amp; 58.5</b>		
<b>Clean Air</b>  Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes No <input type="checkbox"/> <input type="checkbox"/>	
<b>Coastal Zone Management</b>  Coastal Zone Management Act, sections 307(c) & (d)	Yes No <input type="checkbox"/> <input type="checkbox"/>	
<b>Contamination and Toxic Substances</b>  24 CFR Part 50.3(i) & 58.5(i)(2)	Yes No <input type="checkbox"/> <input type="checkbox"/>	
<b>Endangered Species</b>  Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes No <input type="checkbox"/> <input type="checkbox"/>	
<b>Explosive and Flammable Hazards</b>  24 CFR Part 51 Subpart C	Yes No <input type="checkbox"/> <input type="checkbox"/>	
<b>Farmlands Protection</b>  Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes No <input type="checkbox"/> <input type="checkbox"/>	
<b>Floodplain Management</b>  Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes No <input type="checkbox"/> <input type="checkbox"/>	
<b>Historic Preservation</b>  National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes No <input type="checkbox"/> <input type="checkbox"/>	
<b>Noise Abatement and Control</b>  Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	Yes No <input type="checkbox"/> <input type="checkbox"/>	

<p><b>Sole Source Aquifers</b></p> <p>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p>Yes    No</p> <p><input type="checkbox"/>   <input type="checkbox"/></p>	
<p><b>Wetlands Protection</b></p> <p>Executive Order 11990, particularly sections 2 and 5</p>	<p>Yes    No</p> <p><input type="checkbox"/>   <input type="checkbox"/></p>	
<p><b>Wild and Scenic Rivers</b></p> <p>Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p>	<p>Yes    No</p> <p><input type="checkbox"/>   <input type="checkbox"/></p>	
<p><b>ENVIRONMENTAL JUSTICE</b></p>		
<p><b>Environmental Justice</b></p> <p>Executive Order 12898</p>	<p>Yes    No</p> <p><input type="checkbox"/>   <input type="checkbox"/></p>	

**Field Inspection** (Date and completed by):

**Summary of Findings and Conclusions:**

**Mitigation Measures and Conditions [40 CFR 1505.2(c)]**

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure

**Determination:**

- This categorically excluded activity/project converts to Exempt, per 58.34(a)(12) because there are no circumstances which require compliance with any of the federal laws and authorities cited at §58.5. **Funds may be committed and drawn down after certification of this part** for this (now) EXEMPT project; OR
- This categorically excluded activity/project cannot convert to Exempt because there are circumstances which require compliance with one or more federal laws and authorities cited at §58.5. Complete consultation/mitigation protocol requirements, **publish NOI/RROF and obtain "Authority to Use Grant Funds"** (HUD 7015.16) per Section 58.70 and 58.71 before committing or drawing down any funds; OR
- This project is now subject to a full Environmental Assessment according to Part 58 Subpart E due to extraordinary circumstances (Section 58.35(c)).

Preparer Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Name/Title/Organization: \_\_\_\_\_

\_\_\_\_\_

Responsible Entity Agency Official Signature:

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

Name/Title: \_\_\_\_\_

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).



**Environmental Review  
for Activity/Project that is Exempt or  
Categorically Excluded Not Subject to Section 58.5  
Pursuant to 24 CFR Part 58.34(a) and 58.35(b)**

This is a suggested format that may be used by Responsible Entities to document completion of an Exempt or Categorically Excluded Not Subject to Section 58.5 environmental review.

**Project Information**

**Project Name:**

**Responsible Entity:**

**Grant Recipient** (if different than Responsible Entity):

**State/Local Identifier:**

**Preparer:**

**Certifying Officer Name and Title:**

**Consultant** (if applicable):

**Project Location:**

**Description of the Proposed Project** [24 CFR 58.32; 40 CFR 1508.25]:

**Level of Environmental Review Determination:**

Activity/Project is Exempt per 24 CFR 58.34(a): \_\_\_\_\_

Activity/Project is Categorically Excluded Not Subject To §58.5 per 24 CFR 58.35(b):

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**Funding Information**

Grant Number	HUD Program	Funding Amount

**Estimated Total HUD Funded Amount:**

**This project anticipates the use of funds or assistance from another Federal agency in addition to HUD in the form of (if applicable):**

**Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]:**

**Compliance with 24 CFR §50.4 and §58.6 Laws and Authorities**

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

<b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR 50.4 and 58.6	Are formal compliance steps or mitigation required?	Compliance determinations
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §58.6</b>		
<b>Airport Runway Clear Zones and Accident Potential Zones</b>  24 CFR Part 51 Subpart D	Yes    No <input type="checkbox"/> <input type="checkbox"/>	
<b>Coastal Barrier Resources</b>  Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes    No <input type="checkbox"/> <input type="checkbox"/>	
<b>Flood Insurance</b>	Yes    No <input type="checkbox"/> <input type="checkbox"/>	

Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]		
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**Mitigation Measures and Conditions [40 CFR 1505.2(c)]**

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure

Preparer Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Name/Title/Organization: \_\_\_\_\_

Responsible Entity Agency Official Signature:

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

Name/Title: \_\_\_\_\_

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).



**Broad-Level Tiered Environmental Review  
for Activity/Project that is  
Categorically Excluded Subject to Section 58.5  
Pursuant to 24 CFR Part 58.35(a)**

This is a suggested format that may be used by Responsible Entities to document completion of a tiered Categorically Excluded Subject to Section 58.5 environmental review.

**Project Information**

**Project Name:**

**Responsible Entity (RE):**

**State/Local Identifier:**

**RE Preparer:**

**Certifying Officer:**

**Grant Recipient** (if different than Responsible Entity):

**Point of Contact:**

**Consultant** (if applicable):

**Point of Contact:**

**Project Location:**

**Additional Location Information:**

**Direct Comments to:**

**Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:**

**Approximate size of the project area:**

**Length of time covered by this review:**

**Maximum number of dwelling units or lots addressed by this tiered review:**

**Level of Environmental Review Determination:**

Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at §58.5: \_\_\_\_\_

**Funding Information**

Grant Number	HUD Program	Program Name	Funding Amount

**Estimated Total HUD Funded Amount:**

**Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]:**

**Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities and Written Strategies**

<p><b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR 50.4, 58.5, and 58.6</p>	<p>Was compliance achieved at the broad level of review?</p>	<p><b>If Yes:</b> Describe compliance determinations made at the broad level. <b>If No:</b> Describe the policy, standard, or process to be followed in the site-specific review.</p>
<p><b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 &amp; 58.6</b></p>		
<p><b>Airport Hazards</b>  24 CFR Part 51 Subpart D</p>	<p>Yes    No <input type="checkbox"/>   <input type="checkbox"/></p>	

<p><b>Coastal Barrier Resources</b></p> <p>Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]</p>	<p>Yes No</p> <p><input type="checkbox"/> <input type="checkbox"/></p>	
<p><b>Flood Insurance</b></p> <p>Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]</p>	<p>Yes No</p> <p><input type="checkbox"/> <input type="checkbox"/></p>	
<p><b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §58.5</b></p>		
<p><b>Clean Air</b></p> <p>Clean Air Act, as amended, particularly section 176(c) &amp; (d); 40 CFR Parts 6, 51, 93</p>	<p>Yes No</p> <p><input type="checkbox"/> <input type="checkbox"/></p>	
<p><b>Coastal Zone Management</b></p> <p>Coastal Zone Management Act, sections 307(c) &amp; (d)</p>	<p>Yes No</p> <p><input type="checkbox"/> <input type="checkbox"/></p>	
<p><b>Contamination and Toxic Substances</b></p> <p>24 CFR Part 50.3(i) &amp; 58.5(i)(2)]</p>	<p>Yes No</p> <p><input type="checkbox"/> <input type="checkbox"/></p>	
<p><b>Endangered Species</b></p> <p>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p>Yes No</p> <p><input type="checkbox"/> <input type="checkbox"/></p>	
<p><b>Explosive and Flammable Hazards</b></p> <p>24 CFR Part 51 Subpart C</p>	<p>Yes No</p> <p><input type="checkbox"/> <input type="checkbox"/></p>	
<p><b>Farmlands Protection</b></p> <p>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p>Yes No</p> <p><input type="checkbox"/> <input type="checkbox"/></p>	
<p><b>Floodplain Management</b></p> <p>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p>Yes No</p> <p><input type="checkbox"/> <input type="checkbox"/></p>	

<b>Historic Preservation</b> National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes No <input type="checkbox"/> <input type="checkbox"/>	
<b>Noise Abatement and Control</b> Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	Yes No <input type="checkbox"/> <input type="checkbox"/>	
<b>Sole Source Aquifers</b> Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	Yes No <input type="checkbox"/> <input type="checkbox"/>	
<b>Wetlands Protection</b> Executive Order 11990, particularly sections 2 and 5	Yes No <input type="checkbox"/> <input type="checkbox"/>	
<b>Wild and Scenic Rivers</b> Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes No <input type="checkbox"/> <input type="checkbox"/>	
<b>ENVIRONMENTAL JUSTICE</b>		
<b>Environmental Justice</b> Executive Order 12898	Yes No <input type="checkbox"/> <input type="checkbox"/>	

Attach supporting documentation as necessary, including a site-specific checklist.

**Determination:**

- Extraordinary circumstances exist and this project may result in significant environmental impact. This project requires preparation of an Environmental Assessment (EA); OR
- There are no extraordinary circumstances which would require completion of an EA, and this project may remain CEST.

Preparer Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Name/Title/Organization: \_\_\_\_\_

Responsible Entity Agency Official Signature:

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

Name/Title: \_\_\_\_\_

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).

**This document represents the Tier 1 or Broad-Level review *only*. As individual sites are selected, this review must be supplemented by individual Tier 2 or Site-Specific reviews for each site. All laws and authorities requiring site-specific analysis will be addressed in these individual reviews.**



# HUD Form 7015.15 and Example NOI/RROF

**EXAMPLE**  
**NOTICE OF INTENT TO REQUEST RELEASE OF FUNDS**  
**FOR TIERED PROJECTS AND PROGRAMS**

**Date of Publication:**

*City of Pembroke Pines  
601 City Center Way  
3<sup>rd</sup> Floor  
Pembroke Pines, FL 33025*

**On or after *at least one day after the end of the comment period* the City of Pembroke Pines will submit a request to the United States Department of Housing and Urban Development for the release of Community Development Block Grant funds under Title I of the Housing and Community Development Act of 1974, as amended, and HOME Investment Partnership Program funds under Title II of the Cranston-Gonzalez National Affordable Housing act of 1990, as amended to undertake the following project:**

**Tier 1 Broad Review Project/Program Title:** *Residential Rehabilitation Program*

**Purpose:** *This project will assist in rehabilitation affordable homes in the City to provide safe and secure housing for low income residents*

**Location:** *Citywide*

**Project/Program Description:** *The Pembroke Pines Residential Rehabilitation Program provides minor home repairs to low- and moderate-income households. These repairs correct conditions that pose a threat to the health, safety, and welfare of the household occupants. Properties located within 2,500 feet of an airport runway or within 600 feet of an eagle's nest are not eligible for this program. Applicants who are ineligible due to the vicinity of an airport runway or eagle's nest will be analyzed in a separate review. Tier 2 site specific reviews will be completed for those laws and authorities not addressed in the tier 1 broad review for each address under this program when addresses become known.*

**Level of Environmental Review Citation:** *24 CFR 58.35(a)(3)*

**Tier 2 Site Specific Review: The site-specific reviews will cover the following laws and authorities not addressed in the Tier 1 broad review:**

- Flood Insurance (Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994)
- Coastal Zone Management (Coastal Zone Management Act, sections 307(c) & (d))
- Contamination and Toxic Substances (24 CFR Part 58.5(i)(2))
- Floodplain Management (Executive Order 11988)
- Historic Presentation (National Historic Preservation Act)
- Noise Abatement and Control (Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B)

**Mitigation Measures/Conditions/Permits (if any):**

- Flood Insurance – If located in a floodplain, flood insurance must be maintained for the life of the project
- Coastal Zone Management – Consultation with the State Clearinghouse must be completed, and any proposed mitigation measures will be conducted

- Contamination and Toxic Substances – A complete contamination analysis of the property will be conducted, and the results of this analysis will identify appropriate mitigation measures, if any
- Floodplain Management – Projects located in a floodplain will require the completion of a 5-Step Decision Making Process
- Historic Presentation – Consultation with the SHPO and THPOs will be completed and any proposed mitigation measures will be adopted.
- Noise Abatement and Control – Each property will include a completed noise analysis showing that noise will stay within the acceptable limits and/or documentation of noise attenuation measures will be provided.

**Estimated Project Cost:** \$8,705,000 over five years

**The activity/activities proposed are categorically excluded under HUD regulations at 24 CFR Part 58 from National Environmental Policy Act (NEPA) requirements per 24 CFR 58.35(a)(3). Additional project information is contained in the Environmental Review Record (ERR). The ERR will be made available to the public for review either electronically or by U.S. mail. Please submit your request by U.S. mail to the City of Pembroke Pines Planning and Economic Development Department, 601 City Center Way, 3<sup>rd</sup> Floor, Pembroke Pines, FL 33025 or by email to [mstamm@ppines.com](mailto:mstamm@ppines.com). The ERR can be accessed online at *insert website*.**

## PUBLIC COMMENTS

**Any individual, group, or agency may submit written comments on the ERR to the City of Pembroke Pines Planning and Economic Development Department, 601 City Center Way, 3<sup>rd</sup> Floor, Pembroke Pines, FL 33025. All comments received by *if notice is published: notice date plus seven days; if notice is mailed and posted: mailing and posting date plus ten days* will be considered by the City of Pembroke Pines prior to authorizing submission of a request for release of funds.**

## ENVIRONMENTAL CERTIFICATION

**The City of Pembroke Pines certifies to HUD that Charles Dodge Certifying Officer, in his capacity as City Manager consents to accept the jurisdiction of the Federal Courts if an action is brought to enforce responsibilities in relation to the environmental review process and that these responsibilities have been satisfied. HUD's approval of the certification satisfies its responsibilities under NEPA and related laws and authorities and allows the City of Pembroke Pines to use HUD program funds.**

## OBJECTIONS TO RELEASE OF FUNDS

**HUD will accept objections to its release of fund and the City of Pembroke Pines' certification for a period of fifteen days following the anticipated submission date or its actual receipt of the request (whichever is later) only if they are on one of the following bases: (a) the certification was not executed by the Certifying Officer of the City of Pembroke Pines r; (b) the City of Pembroke Pines has omitted a step or failed to make a decision or finding required by HUD regulations at 24 CFR part 58; (c) the grant recipient or other participants in the development**

**process have committed funds, incurred costs or undertaken activities not authorized by 24 CFR Part 58 before approval of a release of funds by HUD; or (d) another Federal agency acting pursuant to 40 CFR Part 1504 has submitted a written finding that the project is unsatisfactory from the standpoint of environmental quality. Objections must be prepared and submitted in accordance with the required procedures (24 CFR Part 58, Sec. 58.76) and shall be addressed to HUD at 909 SE First Avenue, Room 500, Miami, FL 33131 or via email to CPD COVID19-19OEE-MIA@hud.gov. Potential objectors should contact HUD to verify the actual last day of the objection period.**

*City Manager Charles Dodge Certifying Officer*

# Request for Release of Funds and Certification

U.S. Department of Housing and Urban Development  
Office of Community Planning and Development

This form is to be used by Responsible Entities and Recipients (as defined in 24 CFR 58.2) when requesting the release of funds, and requesting the authority to use such funds, for HUD programs identified by statutes that provide for the assumption of the environmental review responsibility by units of general local government and States. Public reporting burden for this collection of information is estimated to average 36 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless that collection displays a valid OMB control number.

## Part 1. Program Description and Request for Release of Funds (to be completed by Responsible Entity)

1. Program Title(s) <input type="text"/>	2. HUD/State Identification Number <input type="text"/>	3. Recipient Identification Number (optional) <input type="text"/>
4. OMB Catalog Number(s) <input type="text"/>	5. Name and address of responsible entity <input type="text"/>	
6. For information about this request, contact (name & phone number) <input type="text"/>		
8. HUD or State Agency and office unit to receive request <input type="text"/>	7. Name and address of recipient (if different than responsible entity) <input type="text"/>	

**The recipient(s) of assistance under the program(s) listed above requests the release of funds and removal of environmental grant conditions governing the use of the assistance for the following**

9. Program Activity(ies)/Project Name(s) <input type="text"/>	10. Location (Street address, city, county, State) <input type="text"/>
--	--

11. Program Activity/Project Description

**Part 2. Environmental Certification** (to be completed by responsible entity)

**With reference to the above Program Activity(ies)/Project(s), I, the undersigned officer of the responsible entity, certify that:**

1. The responsible entity has fully carried out its responsibilities for environmental review, decision-making and action pertaining to the project(s) named above.
2. The responsible entity has assumed responsibility for and complied with and will continue to comply with, the National Environmental Policy Act of 1969, as amended, and the environmental procedures, permit requirements and statutory obligations of the laws cited in 24 CFR 58.5; and also agrees to comply with the authorities in 24 CFR 58.6 and applicable State and local laws.
3. The responsible entity has assumed responsibility for and complied with and will continue to comply with Section 106 of the National Historic Preservation Act, and its implementing regulations 36 CFR 800, including consultation with the State Historic Preservation Officer, Indian tribes and Native Hawaiian organizations, and the public.
4. After considering the type and degree of environmental effects identified by the environmental review completed for the proposed project described in Part 1 of this request, I have found that the proposal did  did not  require the preparation and dissemination of an environmental impact statement.
5. The responsible entity has disseminated and/or published in the manner prescribed by 24 CFR 58.43 and 58.55 a notice to the public in accordance with 24 CFR 58.70 and as evidenced by the attached copy (copies) or evidence of posting and mailing procedure.
6. The dates for all statutory and regulatory time periods for review, comment or other action are in compliance with procedures and requirements of 24 CFR Part 58.
7. In accordance with 24 CFR 58.71(b), the responsible entity will advise the recipient (if different from the responsible entity) of any special environmental conditions that must be adhered to in carrying out the project.

As the duly designated certifying official of the responsible entity, I also certify that:

8. I am authorized to and do consent to assume the status of Federal official under the National Environmental Policy Act of 1969 and each provision of law designated in the 24 CFR 58.5 list of NEPA-related authorities insofar as the provisions of these laws apply to the HUD responsibilities for environmental review, decision-making and action that have been assumed by the responsible entity.
9. I am authorized to and do accept, on behalf of the recipient personally, the jurisdiction of the Federal courts for the enforcement of all these responsibilities, in my capacity as certifying officer of the responsible entity.

Signature of Certifying Officer of the Responsible Entity	Title of Certifying Officer <input style="width: 90%; height: 20px;" type="text"/>
<b>X</b>	Date signed <input style="width: 90%; height: 20px;" type="text"/>

Address of Certifying Officer

**Part 3. To be completed when the Recipient is not the Responsible Entity**

The recipient requests the release of funds for the programs and activities identified in Part 1 and agrees to abide by the special conditions, procedures and requirements of the environmental review and to advise the responsible entity of any proposed change in the scope of the project or any change in environmental conditions in accordance with 24 CFR 58.71(b).

Signature of Authorized Officer of the Recipient	Title of Authorized Officer <input style="width: 90%; height: 20px;" type="text"/>
<b>X</b>	Date signed <input style="width: 90%; height: 20px;" type="text"/>

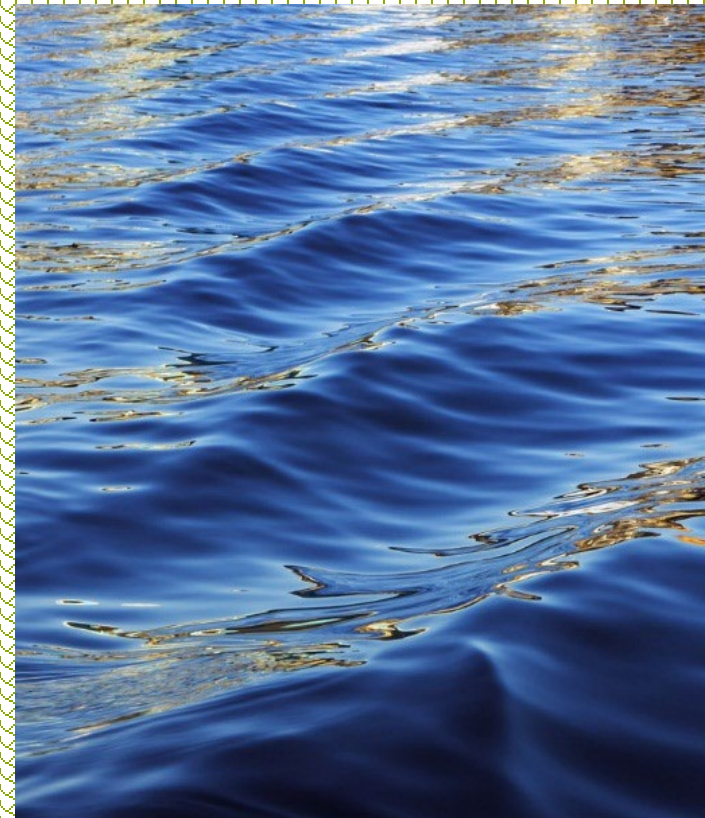
**Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

## **APPENDIX**



# REQUEST FOR RELEASE OF FUNDS (RROF) TRAINING

U.S. DEPARTMENT OF HUD – REGION IV  
JOHN QUADE, FIELD ENVIRONMENTAL OFFICER  
CHUCK MELTÓN, FIELD ENVIRONMENTAL OFFICER





## HUD Environmental Staff Contacts

### Region IV

States	Name	Phone
Oversight of all Region IV States PR, USVI	<b>Jose A. Cedeno-Maldonado</b> Regional Environmental Officer HUD – Caribbean Field Office Parque Las Americas 1 235 Federico Costa Street, Suite 200 San Juan, PR 00918 <a href="mailto:Jose.A.CedenoMaldonado@hud.gov">Jose.A.CedenoMaldonado@hud.gov</a>	(787) 274-5816
Northern FL, KY	<b>Hector Gonzalez Maldonado</b> Field Environmental Officer HUD - Atlanta Regional Office 40 Marietta Street Atlanta, GA 30303 <a href="mailto:Hector.R.GonzalezmalDONADO@HUD.GOV">Hector.R.GonzalezmalDONADO@HUD.GOV</a>	(678) 732-2503
GA, MS	<b>Renea Hall</b> Field Environmental Officer HUD - Atlanta Regional Office 40 Marietta Street Atlanta, GA 30303 <a href="mailto:Renea.S.Hall@HUD.GOV">Renea.S.Hall@HUD.GOV</a>	(678) 732-2100
AL, TN	<b>Chuck Melton</b> Field Environmental Officer HUD - Atlanta Regional Office 40 Marietta Street NW Atlanta, GA 30303 <a href="mailto:Chuck.A.Melton@HUD.GOV">Chuck.A.Melton@HUD.GOV</a>	(678) 732-2133

States	Name	Phone
PR, USVI	<b>Wilfrido Ortiz</b> Field Environmental Officer HUD – Caribbean Field Office Parque Las Americas 1 235 Federico Costa Street, Suite 200 San Juan, PR 00918 <a href="mailto:Wilfrido.G.Ortiz@hud.gov">Wilfrido.G.Ortiz@hud.gov</a>	(787) 274-5807
Southern FL	<b>John Quade</b> Field Environmental Officer HUD – Miami Field Office Brickell Plaza Federal Building 909 SE First Avenue, Suite 500 Miami, FL 33131 <a href="mailto:John.F.Quade@HUD.GOV">John.F.Quade@HUD.GOV</a>	(305) 520-5018
NC, SC	<b>Lenwood E. Smith</b> Field Environmental Officer HUD - Greensboro Field Office 1500 Pinecroft Road, Suite 401 Greensboro, NC 27407 <a href="mailto:Lenwood.E.Smith@HUD.GOV">Lenwood.E.Smith@HUD.GOV</a>	(336) 851-8054
Region IV – Disaster Recovery	<b>Lisbeth San Miguel-Rivera, PhD</b> Field Environmental Officer HUD Caribbean Field Office Parque Las Americas 1 235 Federico Costa Street, Suite 200 San Juan, PR 00918 <a href="mailto:Lisbeth.SanMiguel-Rivera@HUD.GOV">Lisbeth.SanMiguel-Rivera@HUD.GOV</a>	(787) 274-5837

# REQUEST FOR RELEASE OF FUNDS (RROF) AND CERTIFICATION GOALS FOR TRAINING

## This training includes:

- Overview of RROFs and why they are needed
- Tips and strategies for processing of RROFs
- Step-by-step information about the RROF process
- Where to find online guidance and templates
- Regulatory requirements
- Frequently asked questions about RROFs
- Avoiding errors

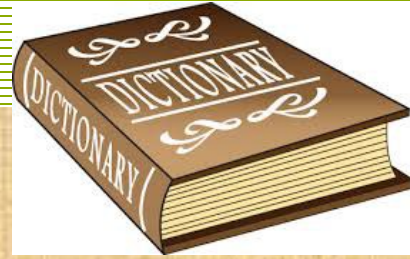


# HUD REGULATIONS FOR RROF

- Under 24 CFR Part 58 – States & local governments may assume HUD's environmental authority
- § 58.22(a) Neither a recipient nor any participant in the development process, including public or private nonprofit or for-profit entities, or any of their contractors, may commit HUD assistance under a program listed in §58.1(b) on an activity or project until HUD or the state has approved the recipient's RROF and the related certification from the responsible entity. In addition, until the RROF and the related certification have been approved, neither a recipient nor any participant in the development process may commit non-HUD funds on or undertake an activity or project under a program listed in §58.1(b) if the activity or project would have an adverse environmental impact or limit the choice of reasonable alternatives. §58.22(a)



# WHAT IS A RESPONSIBLE ENTITY ANYWAY?



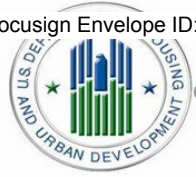
- <https://www.hudexchange.info/programs/environmental-review/orientation-to-environmental-reviews/#part-50-and-part-58>
- HUD regulations at 24 CFR 58 allow the assumption of authority to perform the environmental reviews by responsible entities, which are units of general local government, such as a town, city, county, tribe, or state. The responsible entity is responsible for the scope and content of the review and making the finding. The certifying officer of the responsible entity, usually the mayor, signs the review and takes legal responsibility for the review.



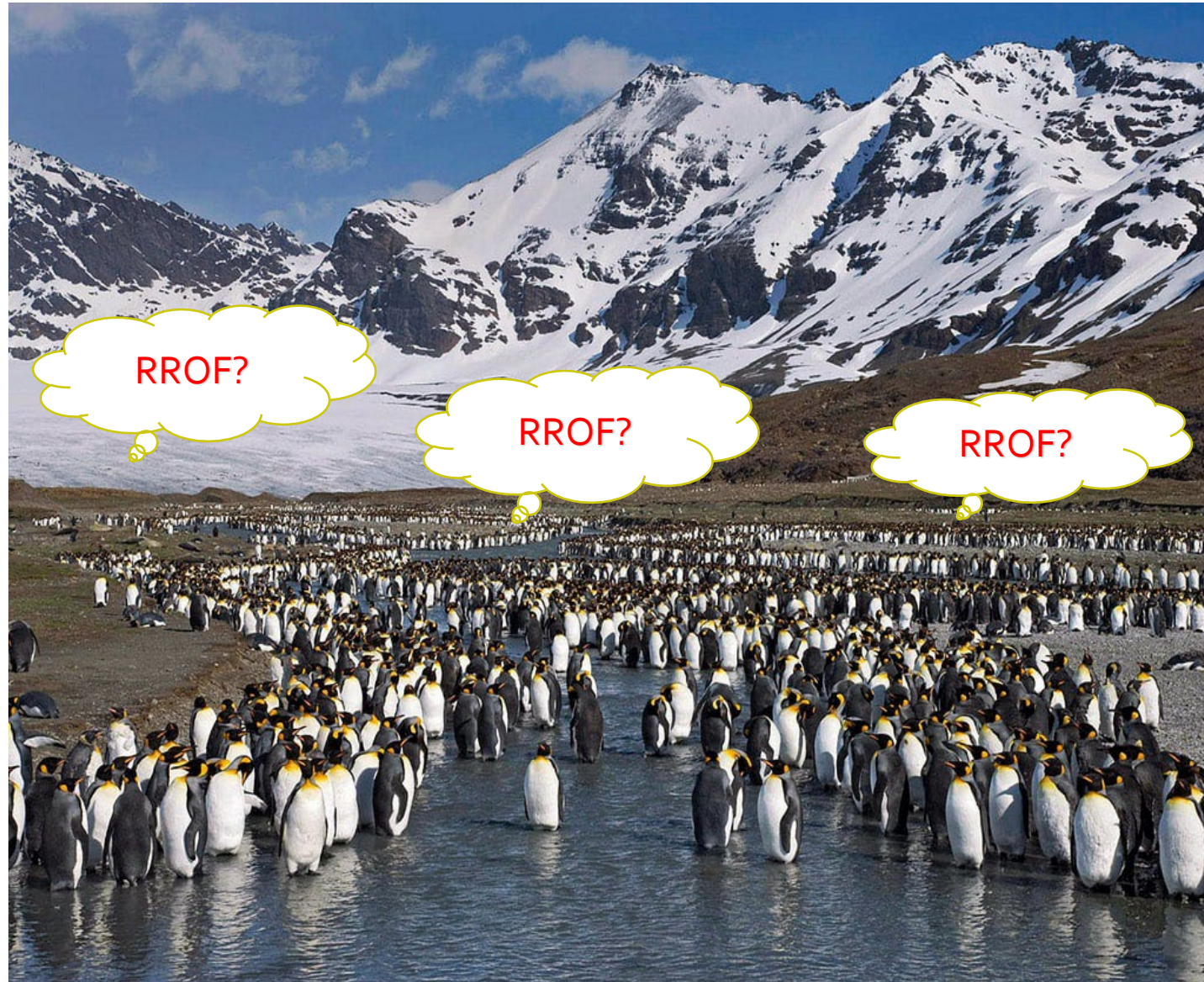
# RESPONSIBLE ENTITY OR SUBRECIPIENT?

- Who is a Responsible Entity (RE)?
- Who is a Subrecipient?

Type	Responsible Entity	Subrecipient
City Government	X	
County Government	X	
State Government	X	
Local Govt from State	X	
Public Housing Authority		X
Habitat for Humanity		X
Competitive Grantee Recipient	X	X
CDBG Subrecipient		X



# What is the significance of the RROF in the environmental review process?



## WHAT EXACTLY IS THE RROF ?

A REQUEST FOR RELEASE OF FUNDS & CERTIFICATION FORM (7015.15) IS.....

- The form used by REs and Recipients when requesting the release of funds, and requesting the authority to use such funds, for HUD programs identified by statutes that provide for the assumption of the environmental review responsibility by units of general local government and states.



# What does the RROF require?

- **Inform the Public** – *two* public notice periods must be observed – first at local level and then with HUD
- **Responsibility** – the RE (and Recipient, if applicable) certifies to HUD that environmental compliance has been met
- **Required by Statute and Regulation** – e.g., CDBG = §104(g) of HCD Act and [24 CFR Part 58](#), including §58.22.
- **Environmental review process is not complete until 7015.16 (AUGF) is issued!**

# Request for Release of Funds and Certification

U.S. Department of Housing and Urban Development  
Office of Community Planning and Development

OMB No. 2506-0087  
(exp. 08/31/2023)

This form is to be used by Responsible Entities and Recipients (as defined in 24 CFR 58.2) when requesting the release of funds, and requesting the authority to use such funds, for HUD programs identified by statutes that provide for the assumption of the environmental review responsibility by units of general local government and States. Public reporting burden for this collection of information is estimated to average 36 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless that collection displays a valid OMB control number.

## Part 1. Program Description and Request for Release of Funds (to be completed by Responsible Entity)

1. Program Title(s)	2. HUD/State Identification Number	3. Recipient Identification Number (optional)
4. OMB Catalog Number(s)	5. Name and address of responsible entity	
6. For information about this request, contact (name & phone number)		
8. HUD or State Agency and office unit to receive request	7. Name and address of recipient (if different than responsible entity)	
	<p><b>The recipient(s) of assistance under the program(s) listed above requests the release of funds and removal of environmental grant conditions governing the use of the assistance for the following</b></p>	
9. Program Activity(ies)/Project Name(s)	10. Location (Street address, city, county, State)	

REs should enter the name and address of the HUD Program or State Agency to whom form HUD-7015.15 will be submitted.

## 7015.15, Part 2: ENVIRONMENTAL CERTIFICATION

- RE has fully carried out environmental review, decision-making & action pertaining to specified project
- RE has complied with NEPA, [§58.5](#), [§58.6](#), and applicable State & local laws
- RE has determined project did or did not require an EIS
- RE has mailed notice(s) and published or posted per required timeframes and has enclosed notice copies/proof of publication
- RE has informed Recipient (if not same as RE) of all required mitigating conditions





# Environmental Certification, Part 2, #4 checkbox error

**Part 2. Environmental Certification (to be completed by responsible entity)**

With reference to the above Program Activity(ies)/Project(s), I, the undersigned officer of the responsible entity, certify that:

1. The responsible entity has fully carried out its responsibilities for environmental review, decision-making and action pertaining to the project(s) named above.
2. The responsible entity has assumed responsibility for and complied with and will continue to comply with, the National Environmental Policy Act of 1969, as amended, and the environmental procedures, permit requirements and statutory obligations of the laws cited in 24 CFR 58.5; and also agrees to comply with the authorities in 24 CFR 58.6 and applicable State and local laws.
3. The responsible entity has assumed responsibility for and complied with and will continue to comply with Section 106 of the National Historic Preservation Act, and its implementing regulations 36 CFR 800, including consultation with the State Historic Preservation Officer, Indian tribes and Native Hawaiian organizations, and the public.
4. After considering the type and degree of environmental effects identified by the environmental review completed for the proposed project described in Part 1 of this request, I have found that the proposal did  did not  require the preparation and dissemination of an environmental impact statement.
5. The responsible entity has disseminated and/or published in the manner prescribed by 24 CFR 58.43 and 58.55 a notice to the public

**If you have a HUD-assisted project that requires an EIS, this is an exceptional circumstance, contact your FEO!**



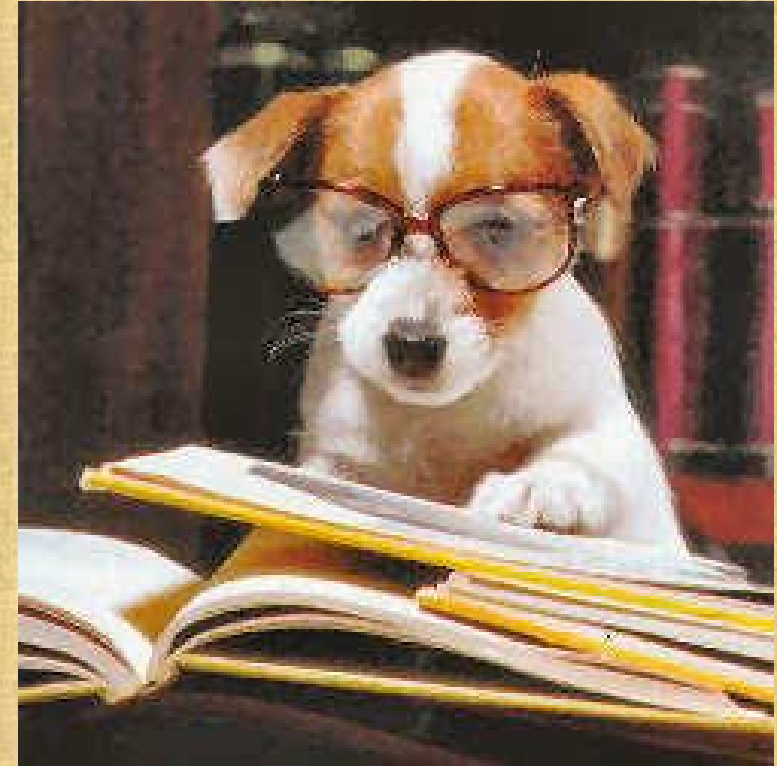
<https://www.hudexchange.info/programs/environmental-review/orientation-to-environmental-reviews/#level-of-review>

Environmental impact statement (EIS):

- Required when an environmental assessment concludes in a Finding of Significant Impact
- Applies when the complexity of the project exceeds the scope of an environmental assessment
- Applies when extraordinary circumstances exist and elevate the level of review
- Required when noise levels exceed 75 decibels (unacceptable noise zone)
- Also required when noise levels are between 65 and 75 decibels (normally unacceptable noise zone) and the project site is largely undeveloped or will encourage incompatible development
- See [24 CFR 58.37](#) or [24 CFR 50.42](#)
- Required for projects involving 2,500 or more housing units or beds

# CERTIFYING OFFICER

- Commits the RE to the jurisdiction of the Federal Courts in environmental matters
- Must be person legally responsible for the community's government – e.g., Mayor, City Manager, Chair of County Commission. Commonly it is the person who signs the grant agreement
- C.O. can delegate role to another person (via governing body resolution) – Copy of delegation must be kept in RE's file in ERR & provided to HUD.
- Sample delegation letter:  
<https://www.hud.gov/sites/documents/CAEDEL.DOCX>



§58.13

# RECIPIENT RESPONSIBILITIES



- Applicable where the RE and Recipient are not the same entity – Recipient is the direct HUD grantee
- Examples: Non-profit agency (Habitat for Humanity); Public/Tribal Housing Authority
- [24 CFR 58.2\(a\)\(5\)](#)
- Recipient agrees to abide by conditions and requirements of the ERR
- Recipient agrees to advise the RE of any changes in the scope of project or in project's environmental conditions

# RECIPIENT SIGNS 7015.15, Part 3



Signature of Certifying Officer of the Responsible Entity

Title of Certifying Officer

X

Date signed

Address of Certifying Officer

### **Part 3** To be completed when the Recipient is not the Responsible Entity

The recipient requests the release of funds for the programs and activities identified in Part 1 and agrees to abide by the special conditions, procedures and requirements of the environmental review and to advise the responsible entity of any proposed change in the scope of the project or any change in environmental conditions in accordance with 24 CFR 58.71(b).

Signature of Authorized Officer of the Recipient

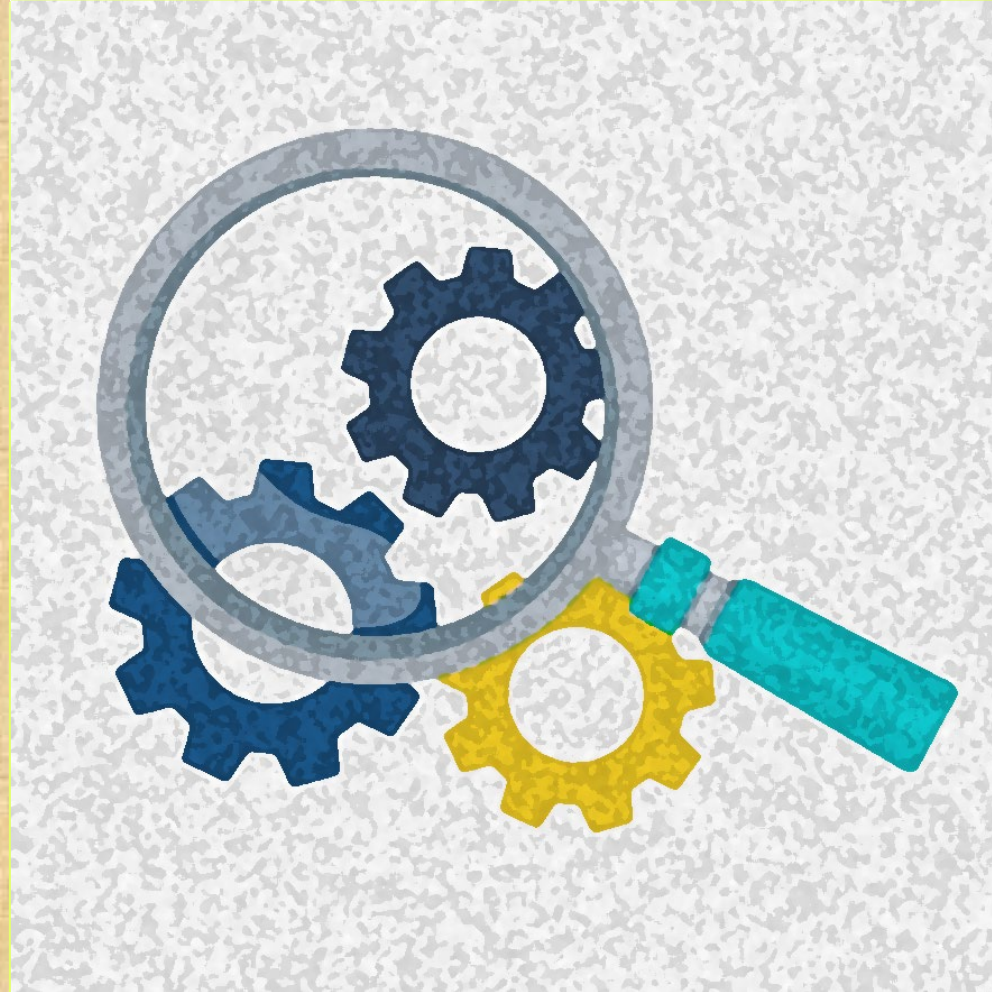
Title of Authorized Officer

X

Date signed

**Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

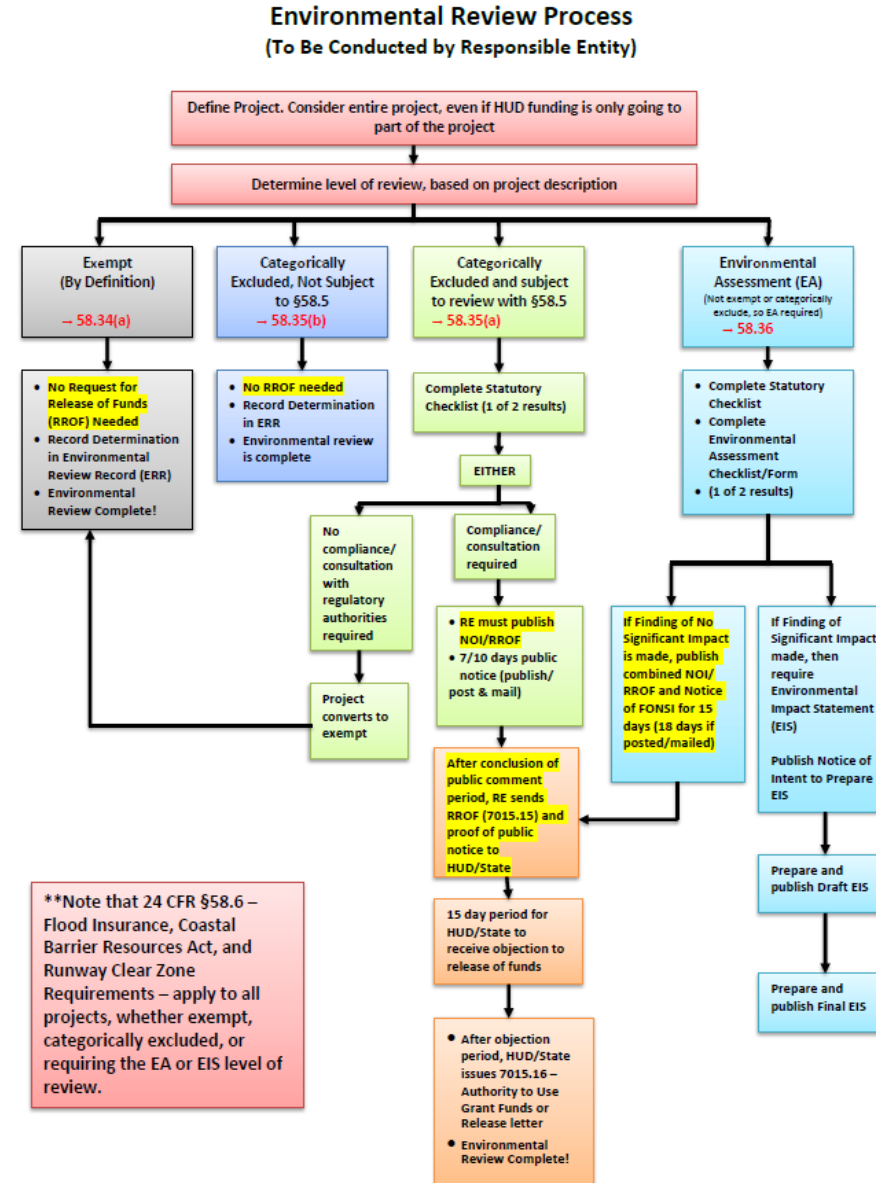
# SUMMARY OF THE RROF PROCESS





# Which environmental reviews require RROF and AUGF?

Part 58 flowchart:  
<https://www.hudexchange.info/resource/5164/part-58-flowchart/>





# HUD SAMPLE NOI-RROF

Link: [SampleNoticeNOI-RROF](#)



<ul style="list-style-type: none"> <li>• NOTICE OF INTENT TO REQUEST RELEASE OF FUNDS</li> <li>• <b>Words in bold type are required language. Words in italics are to be replaced by language appropriate to the particular project and Responsible Entity. The minimum comment period is seven days following publication or ten days if posting and mailing without publication is used.</b></li> <li>•</li> <li>• <i>Date of Notice</i></li> <li>• <i>Name of Responsible Entity [RE]</i></li> <li>• <i>Address (e.g., Street No. or P.O. Box)</i></li> <li>• <i>City, State, Zip Code</i></li> <li>• <i>Telephone Number of RE</i></li> <li>•</li> <li>• <b>On or about at least one day after the end of the comment period the name of RE will if the RE is not also the grant recipient, insert the following language here: "authorize the [name of grant recipient] to submit a request to the HUD/State administering agency for the release of name of grant program funds under Title/Section [ ] of the name of the Act of [year], as amended, to undertake a project known as project title for the purpose of nature/scope of project, estimated funding (include non-HUD funding sources if applicable) and project location if applicable.</b></li> <li>• <b>The activities proposed alternative #1: are categorically excluded under HUD regulations at 24 CFR Part 58 from National Environmental Policy Act (NEPA) requirements or alternative #2: comprise a project for which a Finding of No Significant Impact on the environment was [published/posted] on [date of Finding publication/posting]. An Environmental Review Record (ERR) that documents the environmental determinations for this project is on file at name and address of RE office where ERR can be examined and name and address of other locations where the record is available for review and may be examined or copied weekdays __A.M to __P.M.</b></li> <li>• CONTINUED ON NEXT PAGE....</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• PUBLIC COMMENTS</li> <li>•</li> <li>• <i>Any individual, group, or agency may submit written comments on the ERR to the RE designated office responsible for receiving and responding to comments. All comments received by if notice is published: notice date plus seven days; if notice is mailed and posted: mailing and posting date plus ten days will be considered by the name of RE prior to authorizing submission of a request for release of funds.</i></li> <li>•</li> <li>• OBJECTIONS TO RELEASE OF FUNDS</li> <li>•</li> <li>• <i>HUD/State will accept objections to its release of fund and the RE's certification for a period of fifteen days following the anticipated submission date or its actual receipt of the request (whichever is later) only if they are on one of the following bases: (a) the certification was not executed by the Certifying Officer of the name of RE; (b) the RE has omitted a step or failed to make a decision or finding required by HUD regulations at 24 CFR part 58; (c) the grant recipient or other participants in the development process have committed funds, incurred costs or undertaken activities not authorized by 24 CFR Part 58 before approval of a release of funds by HUD/State; or (d) another Federal agency acting pursuant to 40 CFR Part 1504, has submitted a written finding that the project is unsatisfactory from the standpoint of environmental quality. Objections must be prepared and submitted in accordance with the required procedures (24 CFR Part 58, Sec. 58.76) and shall be addressed to HUD/State administration office at address of that office. Potential objectors should contact HUD/State to verify the actual last day of the objection period.</i></li> <li>•</li> <li>• <i>Name and Title of RE Certifying Officer</i></li> <li>• <i>Sample notices in English and Spanish in both PDF and Word format is available at:</i></li> <li>• <a href="https://www.hudexchange.info/resource/2754/sample-notice-of-intent-to-request-release-of-funds/">https://www.hudexchange.info/resource/2754/sample-notice-of-intent-to-request-release-of-funds/</a></li> </ul>
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**Important!** Follow instructions regarding directing public comments to CPD Centralized Inboxes (email): <https://files.hudexchange.info/resources/documents/Tips-to-Avoid-Republication-of-RROF-During-COVID-19.pdf>



# Sample Notice of Finding of No Significant Impact and Notice of Intent to Request a Release of Funds "COMBINED NOTICE"

<https://www.hudexchange.info/resource/2755/sample-fonsi-and-rrof/>

Sample notice is also available in Spanish

- [REDACTED]
- [REDACTED]
- **NOTICE OF FINDING OF NO SIGNIFICANT IMPACT AND NOTICE OF INTENT TO REQUEST RELEASE OF FUNDS**
- The sample language below is HUD's recommended wording of the combined Notice of Finding of No Significant Impact and Notice of Intent to Request a Release of Funds. This Notice is used for projects requiring an Environmental Assessment (24 CFR Part 58, Section 58.36). Words in bold type are required language. Words in *italics* are to be replaced by language appropriate to the particular project and Responsible Entity.
- **Date of Notice**
- **Name of Responsible Entity [RE]**
- **Address (e.g., Street No. or P.O. Box)**
- **City, State, Zip Code**
- **Telephone Number of RE**
- These notices shall satisfy two separate but related procedural requirements for activities to be undertaken by the name of RE or grant recipient
- **REQUEST FOR RELEASE OF FUNDS**
- On or about at least one day after the end of the comment period the name of RE will if the RE is not also the grant recipient, insert the following language here: "authorize the [name of grant recipient] to" submit a request to the HUD/State administering agency for the release of name of grant program funds under Title/Section [ ] of the name of the Act of [year], as amended, to undertake a project known as project title for the purpose of nature/scope of project, estimated funding (include non-HUD funding sources if applicable) and project location if applicable.
- **FINDING OF NO SIGNIFICANT IMPACT**
- The name of RE has determined that the project will have no significant impact on the human environment. Therefore, an Environmental Impact Statement under the National Environmental Policy Act of 1969 (NEPA) is not required. Additional project information is contained in the Environmental Review Record (ERR) on file at name and address of RE office where ERR can be examined and name and address of other locations where the record is available for review and may be examined or copied weekdays \_\_A.M to \_\_P.M.
- CONTINUED ON NEXT PAGE....

- **PUBLIC COMMENTS**
- Any individual, group, or agency may submit written comments on the ERR to the RE designated office responsible and responding to comments. All comments received by if notice is published: publication date plus fifteen days; if notice posted: mailing and posting date plus eighteen days will be considered by the name of RE prior to authorizing submission request for release of funds. Comments should specify which Notice they are addressing.
- **ENVIRONMENTAL CERTIFICATION**
- The name of RE certifies to HUD/State that name of Certifying Officer in his/her capacity as Official Title consents to accept the jurisdiction of the Federal Courts if an action is brought to enforce responsibilities in relation to the environmental review process and that these responsibilities have been satisfied. HUD's State's approval of the certification satisfies its responsibilities under NEPA and related laws and authorities and allows the name of grant recipient to use Program funds.
- **OBJECTIONS TO RELEASE OF FUNDS**
- HUD/State will accept objections to its release of fund and the RE's certification for a period of fifteen days following the anticipated submission date or its actual receipt of the request (whichever is later) only if they are on one of the following bases: (a) the certification was not executed by the Certifying Officer of the name of RE; (b) the RE has omitted a step or failed to make a decision or finding required by HUD regulations at 24 CFR part 58; (c) the grant recipient or other participants in the development process have committed funds, incurred costs or undertaken activities not authorized by 24 CFR Part 58 before approval of a release of funds by HUD/State; or (d) another Federal agency acting pursuant to 40 CFR Part 1504, has submitted a written finding that the project is unsatisfactory from the standpoint of environmental quality. Objections must be prepared and submitted in accordance with the required procedures (24 CFR Part 58, Sec. 58.76) and shall be addressed to HUD/State administration office at address of that office. Potential objectors should contact HUD/State to verify the actual last day of the objection period.
- **Name and Title of RE Certifying Officer**
- Note: The fifteen or eighteen-day public comment periods are the minimum time periods required by regulation prior to submission of a Request for Release of Funds and Certification (form HUD-7015.15) to HUD/State. The Responsible Entity may choose to allow a longer comment period. 24 CFR Part 58 requires, at Section 58.45, "Time delays for exceptional circumstances," a 30-day comment period for controversial or unique projects or those similar to projects normally requiring preparation of an Environmental Impact Statement. The fifteen-day objection period is a statutory requirement. The objection period follows the submission date specified in the Notice or the actual date of receipt by HUD/State, whichever is later.
- Following completion of the comment period recipients may FAX the form HUD-7015.15 to HUD/State together with a copy of the public notice and a cover letter stating whether comments were received and, if so, how the recipient responded to the comment. The Request for Release of Funds and Certification should not be submitted before the recipient has responded. If the request is sent by FAX, the original signed form should be mailed to HUD/State. The date of receipt by FAX will be counted as the submission date. However, HUD will not issue the 7015.16 "Authority to Use Grant Funds" until after the original signed form is received.
- **Sample notices in English and Spanish in both PDF and Word format is available at:**
- <https://www.hudexchange.info/resource/2755/sample-fonsi-and-rrof/>



**Important!** Follow instructions regarding directing public comments to CPD Centralized Inboxes (email):

<https://files.hudexchange.info/resources/documents/Tips-to-Avoid-Republication-of-RROF-During-COVID-19.pdf>



# CEST

## Summary of RROF Process: *Categorical Exclusion (CEST) Projects*

1. RE mails & publishes /posts **NOI-RROF public notice**
2. RE observes **7/10-day** comment period
3. RE addresses any comments received
4. RE signs RROF and submits to HUD, with proof of mailing, publication and/or posting  
(If Recipient is not RE, Recipient signs, too)
5. HUD observes 15-day objection period
6. HUD issues “Authority to Use Grant Funds” (AUGF)
7. RE implements project, including any environmental conditions that apply



EA

# Summary of RROF Process: *Environmental Assessment (EA) Projects*

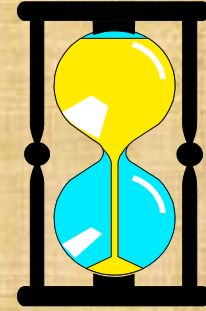
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1. RE mails, publishes and/or posts **FONSI/NOI RROF (“Combined notice”)**
2. RE observes **15/18-day** comment period
3. RE addresses any comments received
4. RE signs RROF and submits to HUD, with proof of mailing, publication and/or posting  
(If Recipient is not the RE, Recipient signs too)
5. HUD observes 15 day objection period
6. HUD issues “Authority to Use Grant Funds” (AUGF)
7. RE implements project, including environmental conditions that apply





# Timing & Counting Days



- RE starts counting the day **AFTER** publication of notice

- §58.21:

**§58.21 Time periods.**

All time periods in this part shall be counted in calendar days. The first day of a time period begins at 12:01 a.m. local time on the day following the publication or the mailing and posting date of the notice which initiates the time period.

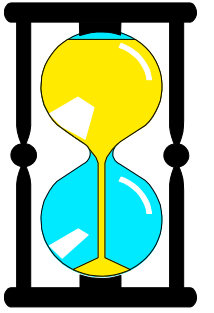
- If last day of comment period falls on Sat, Sun or Holiday, the RE accepts comments through the following business day (**recommended**)
- Required comment periods are minimum; RE may extend comment period for any reason
- **RE Signs** and submits RROF day **AFTER** last day of comment period

# EXAMPLE CALENDAR

Combined Notice

**Pay Attention to Comment Period! (7/10 or 15/18)**

Exhibit "B"



May 2019						
Sun	Mon	Tues	Wed	Thurs	Fri	Sat
			1 Combined NOI/RROF and FONSI Published	2 First day of Public Comment Period	3	4
5	6	7	8	9	10	11
12	13	14	15	16 Last Day of Public Comment Period	17 Day RROF can be Signed and Submitted to HUD	18
19	20	21	22	23	24	25
26	27	28	29	30	31	

**If RROF is submitted to HUD on May 17, then (assuming no objections) last day of objection period is June 1 and HUD funds can be released on June 2.**

# Public Comments

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***RE must address all public comments (if any) before sending the RROF to HUD***



# Submission to HUD

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- Cover letter to program office (**recommended**)
- RROF (HUD-7015.15) – signed and complete
- Public Notice:
  - If Published: Copy of publication and affidavit or tear sheet (if available)
  - If Posted: Copy of posted notice and signed statement of distribution
  - Optional - Signed statement of mailed distribution
- **DO NOT PROVIDE A COPY OF THE ERR.**



# FYI : PUBLIC NOTICES

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- RE should use current HUD-recommended templates – they contain the minimum content – RE can add language, but not subtract
- RE must disseminate (e.g., mail, email) notices to interested groups, individuals and agencies
- RE must address/resolve comments before signing RROF & before submitting RROF to HUD
- RE's notice and RROF should briefly identify which laws and authorities have conditions and/or will be covered in site-specific review



# HUD Program Office RROF Processing

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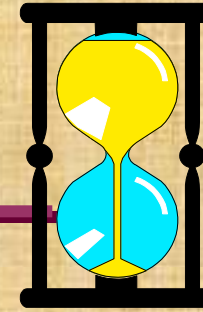
# What happens after HUD receives the RROF?

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1. HUD program office records the date the RROF was received
2. Reviews RROF for completeness
3. Prepares HUD form 7015.16 (Authority to Use Grant Funds form)
4. Waits 15 days, and if there are no public comments,
5. Signs 7015.16 – *CPD or PIH Director (depending on the funding source)*
6. Mails 7015.16 to RE and Recipient

# Timing & Counting Days

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## HUD OBJECTION PERIOD

- ❑ HUD's 15-day period to receive objections starts the next business day **AFTER** receipt of the RROF
- ❑ HUD releases funds the day **AFTER** the end of the objection period – i.e., the following business day
- ❑ Full 15-day objection period must be observed, per [§58.73](#)

# Public Objections (HUD's period)

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HUD objection period = Objections must pertain only to procedural issues (Permissible basis at [§58.75](#))

- Not signed by RE's Certifying Officer
- Necessary findings/determinations not made
- Omitted step in preparation/publication/completion of EA or EIS
- Took action or committed/incurred costs before HUD approval of the environmental certification
- Another Federal agency submits a finding that project is unsatisfactory



# Example Public Objection

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## *Example 1*

“The area has 33% rental property and cannot afford more” ...

“The neighborhood will be used as an incubator for renters, adding to the destabilization of the neighborhood” ...

“The HUD money given to the project would be better used to rehabilitate existing homes in the area instead of building new construction rental property”

Permissible basis for objection during HUD objection period?

***NO!***



# Example Public Objection

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## *Example 2*

“I have included a picture taken last month showing that ground-breaking and construction are already underway.”

Permissible basis for objection?

**YES, per §58.75(e)**



# HUD Response to Objections

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- Always respond to objections
- If objection meets one of the permissible bases, pursue with RE in writing
- Do not issue “Authority to Use Grant Funds” until issue is resolved, i.e.:
  - HUD does not find objection meets a permissible basis
  - HUD is satisfied the RE did not omit a step
  - RE has updated its review &/or mitigated the issue



# Re-Cap: Public Notice

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- NOI-RROF always contains 2 different public comment opportunities – one to **RE** and one to **HUD**
- RE comment period is 7 days if published/10 days if posted
- If project requires FONSI, RE's comment period is 15 days if published/18 days if posted – or 30 days if controversial
- HUD objection period is always 15 days long



# Tips & Troubleshooting the RROF

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# Troubleshooting RROF & notices

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- HUD may ask for **re-submission** of RROF and/or **re-publication** of notice
- Some examples:
  - Local comment period too short
  - RE's notice directed comments to Recipient, instead of RE
  - RROF certified before end of comment period
  - RROF was incorrectly completed – e.g., no project location; project description vague, kitchen sink approach
  - Long lapse between Notice and submission of RROF to HUD



# Example of Incomplete Description

- Project description incomplete & location vague

<p>9. Program Activity(ies)/Project Name(s)  <b>Thirty-Seventh Year CDBG projects</b></p>	<p>10. Location (Street address, city, county, State)  <b>City of ██████████, ██████ County, Iowa</b></p>
<p>11. Program Activity/Project Description  <b>All Community Development Block Grant program activities including Sec. 108 Loan Guarantee</b></p>	

**FINDING:** §§58.38(a)(1); 58.2(a)(4); 58.32(a); 58.71(a)



# Example of “Kitchen Sink” Approach

- All CDBG activities for 5 Year Con Plan

Part 1. Program Description and Request for Release of Funds (to be completed by Responsible Entity)		
1. Program Title(s) Community Development Block Grant Program (CDBG)	2. HUD/State Identification Number [REDACTED]	3. Recipient Identification Number (optional)
4. OMB Catalog Number(s) 14.218 Entitlement Grant	5. Name and address of responsible entity Housing and Neighborhoods Department [REDACTED]	
6. For information about this request, contact (name & phone number) [REDACTED]	7. Name and address of recipient (if different than responsible entity) SAME	
8. HUD or State Agency and office unit to receive request U.S. Department of HUD 40 Marietta Street, 4 <sup>th</sup> Floor Atlanta, GA 30303-2806		
<b>The recipient(s) of assistance under the program(s) listed above requests the release of funds and removal of environmental grant conditions governing the use of the assistance for the following</b>		
9. Program Activity(ies)/Project Name(s) Consolidated Plan Programs Community Development Block Grant	10. Location (Street address, city, county, State) [REDACTED]	
11. Program Activity/Project Description 2011-2016 Consolidated Plan Activities to include: City-wide housing construction and rehabilitation Public Facilities and Improvements Economic Development Activities Acquisition of Real Property Clearance and Demolition Public Services Removal of Architectural Barriers Code Enforcement Historic Preservation Special Economic Development Special Activities by Community-Based Development Organizations		



# Example of Good Description

- Aggregated description & clear project location

<p>9. Program Activity(ies)/Project Name(s)</p> <p><b>Oak Point Redevelopment &amp; Faxon School Conversion to Senior Housing</b></p>	<p>10. Location (Street address, city, county, State)</p> <p>3800 block of Elmwood Avenue, 4342-46 Norton Avenue, 4401-03 Norton Avenue, 4412-14 Norton Avenue, 4420-24 Norton Avenue, and 4427 Norton Avenue, 3710 The Paseo Boulevard, ██████████ County, Missouri</p>
<p>11. Program Activity/Project Description</p> <p><b>Oak Point Redevelopment</b>                  Acquisition of land and the construction of 15 EnergyStar rated duplex structures containing 30 single family units, construction of a segment of roadway (extension of Cypress Avenue from 38th Street to 39th Street) and related infrastructure. Twenty of the units will be within one 3.2 acre project site; the other 10 units will be on 5 scattered sites within the Northwest Vineyard neighborhood.</p> <p><b>Faxon School Conversion</b>                  Acquisition and conversion of the 70,000 square foot historic Faxon School building, located in the Squire Park Historic District, into 45 affordable senior housing units utilizing state and federal historic tax credits and the Secretary of the Interior’s Standards for Rehabilitation. There will be no new construction.</p>	

 <https://files.hudexchange.info/resources/documents/Environmental-Review-Partner-Worksheet.docx>

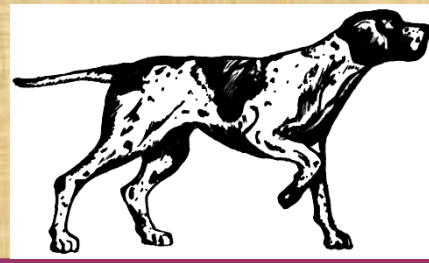


# Example of Good Description

- Single-family rehab program

<p>9. Program Activity(ies)/Project Name(s)                  Activities approved in 2013 Consolidated Plan including Major Home Rehabilitation</p>	<p>10. Location (Street address, city, county, State)                  All projects will be in cities located throughout ██████████ County, KS</p>
<p>11. Program Activity/Project Description                  Major rehabilitation of owner-occupied, single family housing in scattered locations. An estimated 16 homes will be rehabilitated for an estimated cost of \$498,000. The estimated range of rehabilitation costs will be from \$5,000 to \$40,000, and assistance will be provided in the form of a forgivable 10 year deferred loan. Eligible activities will include major systems replacement, roof replacements , lead abatement/remediation, radon remediation, asbestos removal, window and door replacements, insulation and energy efficiency improvements.</p>	

 <https://files.hudexchange.info/resources/documents/Environmental-Review-Partner-Worksheet.docx>

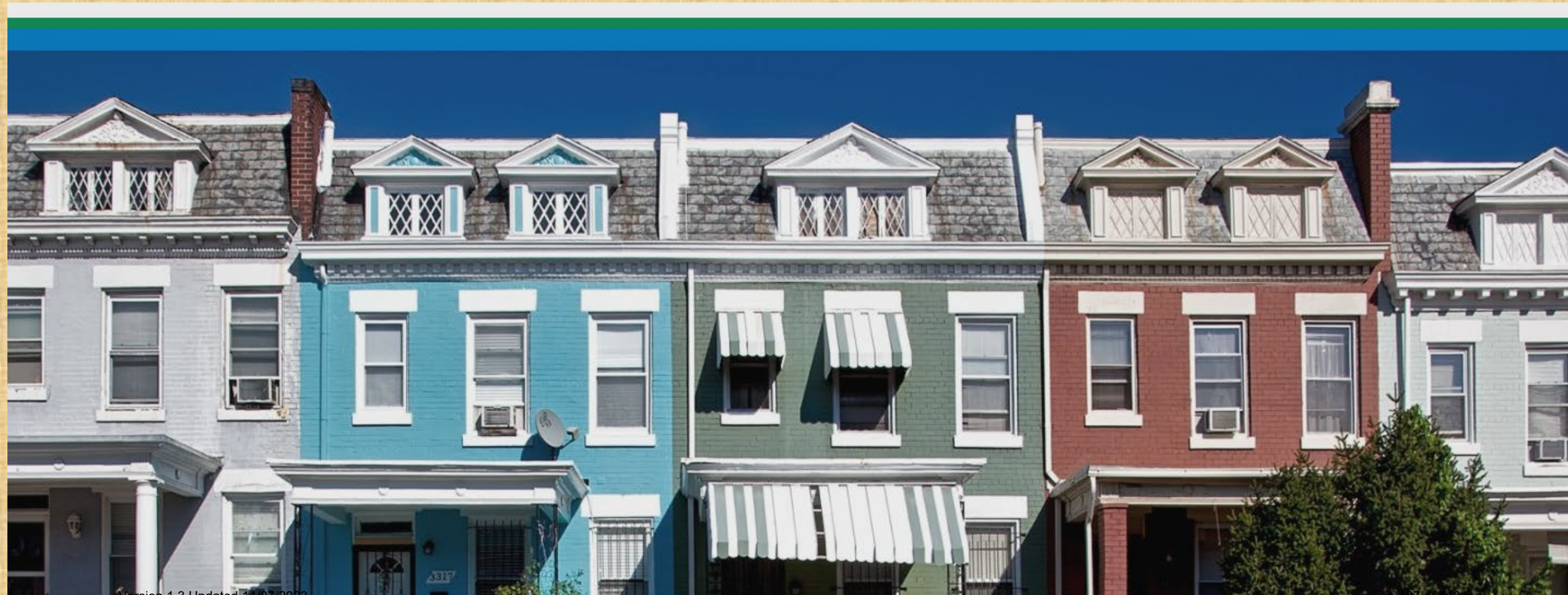


## RROF – *Pointers*

- **Do** include *estimated HUD funding on the public notice*
- **May** include *estimated HUD funding on RROF (**required** if Multi-year funding [§58.32\(d\)](#) )*
- **Do** have *RROF certified (signed) on single page (front/back on one page)*
- **Do not** inadequately inform the public or certify (e.g., wrong address, vague project description)
- **Do** have *RROF certified **after** public comment period ends*
- **Do** use *current OMB-approved RROF form*



**When HUD issues the 7015.16 (AUGF), the environmental review is complete - time to start the project!**





# HUD Exchange Links

- **HUD Exchange - Official website for the Department of Housing and Urban Development's (HUD's) Office of Environment and Energy**  
<https://www.hudexchange.info/programs/environmental-review/>
- **HUD Form 7015.15 – Request for Release of Funds and Certification**  
<https://www.hudexchange.info/resource/2338/hud-form-701515-request-release-funds-certification/>
- **Sample Notice of Intent to Request Release of Funds - English and Spanish**  
<https://www.hudexchange.info/resource/2754/sample-notice-of-intent-to-request-release-of-funds/>
- **Sample Notice of Finding of No Significant Impact (FONSI) and Request Release for Funds (RROF) - English and Spanish**  
<https://www.hudexchange.info/resource/2755/sample-fonsi-and-rrof/>

# Questions?



Regional and Field Environmental Officers contact information:

<https://www.hudexchange.info/programs/environmental-review/hud-environmental-staff-contacts/#region-i-regional-and-field-environmental-officers>

Online environmental review training modules: <https://www.hudexchange.info/trainings/wiser/>



# Example Planning Calendar

	A	B	C	D
1	Activity/Event	Meeting Date	Meeting Time	Meeting Location
2	CAPER cutoff date	09/30/24		
3	City Commission	10/08/24	6:30 PM	Commission Chambers
4	Semi-Annual Labor Report 4/1/24 - 9/30/24 Submitted	10/10/24		
5	City Commission	10/16/24	6:30 PM	Commission Chambers
6	CAPER due from CRA	11/04/24		
7	City Commission	11/06/24	6:30 PM	Commission Chambers
8	CAPER Finance review completed	11/14/24		
9	CAPER Public Notice Published (minimum 15 days)	11/17/24		
10	CAPER Citizen Review Begins	11/18/24		
11	City Commission	11/20/24	6:30 PM	Commission Chambers
12	CAPER Citizen Review Ends	12/03/24		
13	City Commission CAPER Adoption	12/04/24	6:30 PM	Commission Chambers
14	City Commission CAPER Public Hearing	12/04/24	6:30 PM	Commission Chambers
15	City Commission	12/18/24	6:30 PM	Commission Chambers
16	CAPER Submitted to HUD	12/27/24		
17	Begin Data Mining	01/01/25		
18	City Commission	01/01/25	Pending	Not on Calendar
19	City Commission	01/01/25	Pending	Not on Calendar
20	Send Housing/Supportive Services Questionnaire/Survey link	02/01/25		
21	Update Anti-Displacement and Relocation Plan	02/01/25		
22	Review and Update as Necessary Citizens Participation Plan	02/01/25		
23	Pre-Development Ad Runs 15 Day	02/02/25		
24	City Commission	02/05/25	6:30 PM	Commission Chambers
25	City Commission	02/19/25	6:30 PM	Commission Chambers
26	City Commission - Pre-development Public Hearing	02/25/25	6:30 PM	City Hall Conference Room
27	Begin Environmental Reviews	03/01/25		
28	City Commission	03/19/25	6:30 PM	Commission Chambers
29	City Commission	04/02/25	6:30 PM	Commission Chambers
30	Semi-Annual Labor Report 10/1/24 - 3/31/25 Submitted	04/11/25		
31	Run FONSI 15 Day Comment	04/13/25		
32	Con Plan due from CRA with Citizen Participation Plan	04/15/25		
33	City Commission	04/16/25	6:30 PM	Commission Chambers
34	Updated LHAP Due to Florida Housing	05/02/25		
35	City Commission	05/07/25	6:30 PM	Commission Chambers
36	City review completed	05/09/25		
37	Pre-Adoption Ad Runs 30 Day Public Comment	05/11/25		
38	City Commission	05/21/25	6:30 PM	Commission Chambers
39	City Commission Pre-Adoption Public Hearing	06/18/25	6:30 PM	Commission Chambers
40	Commission Meeting Plan Adoption	06/18/25	6:30 PM	Commission Chambers
41	City Commission	06/18/25	6:30 PM	Commission Chambers
42	SHIP PY Ends	06/30/25		
43	City Commission	07/02/25	6:30 PM	Commission Chambers
44	SHIP Reconciliation City Gen. Ledger to CRA	07/08/25		
45	City Commission	07/16/25	6:30 PM	Commission Chambers
46	NOI/RROF Ad Runs 15 days	07/27/25		
47	Action Plan Due to County This may change	07/28/25		
48	City Commission	08/06/25	6:30 PM	Commission Chambers
49	Draft SHIP Annual Report to City	08/12/25		
50	Action Plan Due to HUD	08/15/25		
51	NOFA Ad Runs	08/15/25	6:30 PM	Commission Chambers
52	City Completes SHIP AR Review	08/19/25		
53	City Commission	08/20/25	6:30 PM	Commission Chambers
54	SHIP Annual Report Posted to Websites for Comment	08/20/25		
55	City Commission	09/10/25	6:30 PM	Commission Chambers
56	SHIP Annual Report Due to FHHC	09/15/25	6:30 PM	Commission Chambers
57	City Commission	09/24/25	6:30 PM	Commission Chambers
58	City Commission	10/01/25	6:30 PM	Commission Chambers
59	Semi-Annual Labor Report 4/1/25 - 9/30/25 Submitted	10/10/25		
60	City Commission	10/15/25	6:30 PM	Commission Chambers
61	City Commission	11/05/25	6:30 PM	Commission Chambers
62	CAPER due from CRA	11/07/25		
63	CAPER Finance review completed	11/15/25		
64	CAPER Public Notice Published (minimum 15 days)	11/16/25		
65	CAPER Citizen Review Begins	11/17/25		
66	City Commission	11/19/25	6:30 PM	Commission Chambers
67	City Commission CAPER Adoption	12/03/25	6:30 PM	Commission Chambers
68	City Commission CAPER Public Hearing	12/03/25	6:30 PM	Commission Chambers
69	City Commission	12/17/25	6:30 PM	Commission Chambers
70	CAPER Submitted to HUD	12/26/25		

## Fee Schedule

<u>CDBG Administration and Implementation</u> -	15% of PY Allocation
<u>SHIP Administration and Implementation</u> -	10% of PY Allocation
<u>HOME Program Direct Services</u> -	\$ 3,000 @ unit
payable 50% at income certification, 50% at closing for purchase assistance or final inspection for residential rehabilitation.	
<u>CDBG Program Income</u>	15% of recapture
<u>SHIP Program Income</u>	5% of recapture
<u>NSP Program Income</u>	15% of recapture



## Some History

Established in 1990 Community Redevelopment Associates of Florida, Inc. (CRA) is a urban affairs consulting firm based in Pembroke Pines, Florida. We provide a wide-range of services, of which Federal and State grant planning, administration and implementation are primary. With a staff of multi-disciplinary bilingual professionals we are prepared for any challenge.



CRA has developed a proven, cost-effective system for the administration of Federal and State housing programs. Grant programs in which we specialize, but are in no way are limited to, include the Dept. of Housing and Urban Development Community Development Block Grant (CDBG) program, Neighborhood Stabilization Program (NSP), and Home Investment Partnership (HOME) program. Additionally we have worked extensively in Florida's State Housing Initiative Partnership (SHIP) program.

The shaping of many of the regulations that guide these Federal and State grant programs have had input from our staff. CRA had representation on the Statewide Housing Needs Task Force which led to the passage of the State of Florida's Sadowski Affordable Housing Act. Housing programs have been developed and approved by the Florida Housing Finance Corporation, Fannie Mae and the U.S. Department of Housing and Urban Development.

We have been directly responsible for the development and subsequent administration of 10 Federal and State Entitlement programs in South Florida. These communities have included the cities of Pembroke Pines, Miramar, Margate, Tamarac, Plantation, Deerfield Beach, Cooper City, Lauderdale Lakes and West Palm Beach. In 2007 CRA guided Coconut Creek FL through the Entitlement process.

Uniquely, two of CRA's clients received their Entitlement or Urban County status as a direct result of our efforts. Successful challenges to the U.S. Bureau of the Census population estimates for Margate FL and Collier County FL were completed, resulting in their receipt of millions of dollars in grant funding.

During the last 35 years, CRA has completed more than 20 Consolidated Plans. This work included all aspects of the Citizens Participation process. The State of Florida also requires the preparation of Local Housing Assistance Plans for its SHIP program and we have been preparing and implementing them since 1993 for our clients.

### **Some History Cont.**

Thousands of homes have been purchased and or rehabilitated/hardened through our administration of residential rehabilitation, disaster mitigation and purchase assistance programs. We have screened, interacted with, and income certified thousands of applicants. CRA has had the responsibility for the administration and implementation of upwards of \$27 million in expenditures during a single program year for its clients.

We prepared successful NSP 1 applications for the cities of Pembroke Pines, Miramar, and Coral Springs FL. As part of a public/private partnership, CRA also completed NSP2 grant applications for the cities of Miramar and Pembroke Pines FL.

As a result, CRA worked with the communities of Pembroke Pines, Miramar and Coral Springs to administer their NSP1 purchase assistance/rehabilitation programs which represented approximately \$17 million in NSP funding.

CRA completed intake and review of close to 600 applications for these three cities, developed and educated a network of over 150 realtors and are working to establish ways to address NSP requirements through partnerships that will better facilitate the purchase of NSP eligible properties. 428 households were fully income certified for NSP assistance, over 160 properties closed and transitioned to residential rehabilitation. These numbers include those being acquired directly by the cities of Pembroke Pines and Miramar, FL where we instituted municipal acquisition programs of foreclosed properties.

With respect to NSP 3, the City of Pembroke Pines received an allocation of \$2,330,542 and the City of Miramar received \$2,321,827. Identical strategies were used as those implemented in NSP1. These strategies were met with equal success. As a result, 100% of NSP 1 and NSP 3 funding has been expended in both client cities. CRA continues to work with clients to expend program income generated by the NSP 1 and NSP 3 acquisition strategies. The aforementioned was accomplished while providing administration and direct services to the regular CDBG program as well as CDBG-R, DRI and SHIP programs as well.

### **Past Performance**

The programs administered by CRA have been audited at the local, State and Federal level. CRA does not have any pending disciplinary action within any Federal, local or State regulatory body or professional organization. In addition there has never been a claim made against our professional liability insurance.

## **Capacity**

Our core service is program management with specialization in the administration of programs and activities funded by the U.S. Department of Housing and Urban Development (HUD) and the State of Florida in accordance with appropriate regulations



We have a fully developed and operational performance delivery plan that utilizes our staffing, program knowledge, modern technology and database monitoring capabilities that allows us to complete projects in a timely manner. With our “economies of scale approach” we can bring our service to you at the lowest possible project cost.

CRA provides a program specialist that supervises each individual purchase assistance and residential rehabilitation project. In addition, there will always be a review partner and senior staff to provide project management and oversight. Separate internal financial management provides full time control as it relates to encumbering and expending client’s program funding within the stipulated time-frame. Our on-site staff of 4 is full-time and operates out of the main office in Pembroke Pines.

CRA also has also utilizes contracted technical support personnel to the main staff for application underwriting and SHIP tracking and reporting. Intake activities can be provided at a client location as required as well as from our website at <https://www.crafla.com>.

CRA has also contracted with Civitas LLC, a HUD TA firm for on-going technical support and training for on-site staff.

Every staff member has their own modern up-to-date computer workstation. Each station is networked to four high speed servers housed in our main office. Due to COVID-19, and in preparation for future emergencies, CRA's staff and management are capable of working remotely and can provide the same level of service.

Utilizing high speed broadband our phone system is capable of handling high volume. Our website is housed in a secure off-site facility on a secure dedicated web server. In addition CRA's email is housed off-site on secure servers.

## **Technical Assistance**

On an individual project basis we have assisted with revamping existing programs for Entitlements and developed work-out plans so they could meet HUD expenditure rate guidelines. Workout plans developed by CRA have been cited by HUD as “best practice”. Assistance in developing community and economic development programs that are compliant with Federal and State programs is also available.

Direct services to existing CDBG, HOME and other affordable housing programs such as income certification and application processing can be provided. The firm has established relationships with housing, community and economic development agencies.

We have experience working with and monitoring non-profits, lenders, title companies, construction contractors, architects and engineers. On behalf of our clients we have developed and maintained a lenders’ consortium of reputable lenders for the purchase assistance programs. Pool management of licensed and insured general contractors for residential rehabilitation programs is also provided. We actively conduct outreach activities to build these pools to encourage, small, minority and women owned businesses to participate.

The Davis-Bacon Act requires that all contractors and subcontractors performing on federal contracts (and contractors or subcontractors performing on federally assisted contracts under the related Acts) in excess of \$2,000 pay their laborers and mechanics not less than the prevailing wage rates and fringe benefits listed in the contract’s Davis-Bacon wage determination. CRA has been providing Davis-Bacon Compliance Monitoring of contractors and subcontractors payrolls for nearly two decades.

Section 3 of the Housing and Urban Development Act of 1968 is HUD’s legislative directive for providing preference to low- and very low-income residents of the local community (regardless of race or gender), and the business that substantially employ these persons, for new employment, training, and contracting opportunities resulting from HUD funded projects. We can provide development of effective Section 3 programs.

## **Our Management Approach**

There are key elements to the successful management and implementation of any grant funded program, albeit a purchase assistance or residential rehabilitation program. The following section offers a brief discussion of a few of them.

### **Staff Experience**

CRA has been administering and providing direct services for, among others, purchase assistance, residential rehabilitation, and economic development affordable housing programs for 35 years. Our staff possess the necessary government, real estate, lending and scattered site construction management backgrounds to effectively and efficiently administer the aforementioned programs. Our staff is well versed in the various State and Federal regulations which govern the administration and direct services funded by a variety of grant sources.

CRA staff receives continuing education and training throughout the year, staying abreast of ever changing federal grant program regulations. In addition, in-service training is also provided routinely on the practical aspects of program implementation, including conflict mediation and complaint resolution. This training is necessary to ensure program quality and compliance.

### **Customer Service**

As a private sector grant administrator, providing customer service that is timely and responsive to the community and our clients is a priority. It is critical to our success as a business. We have established standards for customer service as it relates to the various aspects of program administration.

Being responsive to the client (governmental staff), the general public seeking information, and last and perhaps most important, direct beneficiaries (program participants) is paramount. Similar expectations are required of the various other role players involved in implementing any grant program. Additionally, the majority of our staff is bi-lingual, speaking English, and Spanish.



Our staff lives by the credo that at the end of every work day they know that a family's life has been made better through their efforts.

## Performance Standards - Quality Control

Performance measures and standards are established for CRA, the programs we administer, and the associated tasks we must undertake. These include budget and fiscal controls and program management.

CRA utilizes detailed policy and procedure manuals for all programs under its administration, including residential rehabilitation, purchase assistance, and environmental review.

CRA focuses its efforts on the most efficient means available, producing high quality work that achieves the client's programmatic goals. Staff meetings where expenditure updates and monthly goal accomplishments are reported to management are regularly held. Management is also able to track productivity of the staff through our database tracking system.

A comprehensive analysis of a program's plan of work is done to determine the effort required to implement the program and resources are assigned accordingly. CRA will continuously reassess the program, direct service activities and resources required to ensure timely completion of all associated tasks. Monitoring and review procedures have been established and are utilized at various benchmarks during program implementation. Record keeping is extremely detailed and in keeping with the transparency required of public records.

A system of checks and balances is in place to further the quality of work performed. The CEO of the company serves as review partner to ensure further quality control of documents produced or procedures implemented in conjunction with the management and oversight of the programs. All projects must have management authorization before any federal expenditure is reimbursed.

## Project Tracking and Monitoring

In order to provide adequate project tracking and monitoring, CRA adapted constituent relationship management software and record keeping systems to efficiently manage client programs. Utilizing this software provides centralized access to up-to-date information for residents, our client cities and all relevant regulatory agencies.



## Economies of Scale Approach

Using the economy of scale approach, we are able to provide services at a reduced cost to our clients. Review of prior year contractor and grantee costs associated with direct delivery reveal a reduction of per unit costs as high as 30 percent. This provides for more "dollars on the street" and applicants assisted.

## LETTER OF INTEREST/EXECUTIVE SUMMARY



**Please accept this Executive Summary as an expression of our sincere interest in providing administration and implementation of the City of Pembroke Pines various Federal and State grant programs. It is our belief that Community Redevelopment Associates is the best choice for filling the City's needs.**

Community Redevelopment Associates of Florida, Inc. (CRA), is an employee owned urban affairs consulting firm based in Pembroke Pines Florida. Established in 1990, CRA has more than *35 years* of experience with both the Department of Housing and Urban Development Community Development Block Grant (CDBG) program, and the Florida's State Housing Initiative Partnership (SHIP) program.

CRA sums up its responsibility to its clients simply: *"Our job is to protect the taxpayer's money."*

CRA has provided a combination of grant administration and direct service program implementation for 13 cities in Broward County as well as Broward County itself. This includes transitioning clients to entitlement status and performing comprehensive Federal and State grant and program management services. We have served the residents of the City of Pembroke Pines in various capacities including grants administrator for nearly 33 years. Throughout the years we have overseen programs such as residential rehabilitation, first-time home-buyer assistance, capital improvement and transitional housing, unit-for unit replacements and developed new programs such as one-time rental assistance and foreclosure prevention programs for our clients. Contact references have been included for our past clients.

Our firm also has extensive knowledge and hands on practical experience with the HOME program since the inception of the Broward County HOME Consortium. CRA provides ongoing direct service delivery to the HOME program for the City of Pembroke Pines.

While residential home prices have been quite volatile over the last several decades, first time home buyers were assisted in purchasing in excess of *\$30,000,000* of affordable housing utilizing the Neighborhood Stabilization Programs (NSP1 & NSP3,) HOME, and SHIP first-time home-buyers purchase assistance programs. We are proud of the fact that the City of Pembroke Pines achieved timely and compliant expenditure of its NSP1 funds as well as its NSP3 allocation.

Cumulatively, we have administered, implemented or provided direct services for projects utilizing in excess of *\$110,000,000* in grants on behalf of our clients. As a result, we have been "hands on" in the rehabilitation of over *\$250,000,000* worth of single family residential housing.

## LETTER OF INTEREST/EXECUTIVE SUMMERY (Cont.)

The CRA team is multi-disciplinary. Community Redevelopment Associates of Florida has four full time staff positions. This includes its President and CEO who is actively engaged in the management of the firm, and three full-time employees. Additionally there is one part-time employee, as well as two technical assistants. CRA has also contracted with Civitas LLC, a HUD TA for ongoing technical support.

Our staff is extensively trained in those disciplines that are required in providing outstanding service to our clients. All of our experienced staff professionals will provide day-to-day services to the management, administration and implementation of Federal and State grant programs for the City of Pembroke Pines.

Our experience and expertise include all facets of Federal and State housing and community development programs including the preparation of Consolidated Plans, Local Housing Assistance Plans, Affordable Housing Incentive Plans, operating and maintaining the Integrated Disbursement and Information System (IDIS), the Consolidated Planning Management Process (CPMP) tool and all necessary State and Federal reporting requirements. In addition, we are "hands on" in all aspects of program implementation, including income certification and contractor management. We operate as a resource to the clients we serve.

Thank you for your interest in Community Redevelopment Associates of Florida, Inc. (EIN 65-0216617)

Sincerely,



Martin Larsen  
President / CEO

***Our Job:***  
***To protect the taxpayers money.***

***Our Mission Statement:***  
**We are committed to making lives better by providing services that result in communities that are great places to live, work, and raise a family.**

***Our Goal:***  
**Is to be the resource in the development of quality communities.**

## Previous and Current Clients

<b>Previous and Current Clients</b>	<b>Project Years</b>
Broward County FI HOME Consortium	2003 - 2011
City of Coconut Creek FL	2005 - 2020
City of Cooper City FL	2000, 2002 - 2016
City of Coral Springs FL	2009 - 2014
City of Deerfield Beach FL	2011 - 2016
City of Groveland FL	1995 - 1997
City of Lauderdale Lakes FL	1998 - 2016
City of Lauderhill FL	1996 - 1997
City of Margate FL	1996 - 1998
City of Miami Beach FL	2008
City of Miramar FL	1998 - 2021
City of North Lauderdale FL	2006
City of Pembroke Pines FL	1993 - Current
City of Plantation FL	1998 - 2019
City of Pompano Beach FL	2005 - 2007
City of Sunrise FL	1998 - 2001
City of Tamarac FL	1998 - 2004
City of West Palm Beach FL	2012 - 2014
Collier County FI	1999
Town of Davie FL	1998
Town of Golden Beach FL	1997
Town of Pembroke Park FL	2002

Community Redevelopment Associates of Florida Inc.  
SHIP and CDBG Expenditures, Homeowners Assisted  
As Reported to City of Pembroke Pines August 2025

**SHIP LHAP program years: 2022 - 2023, 2023 - 2024 and 2024 - 2025**

**Pembroke Pines Minor Home Repair**

**Totals**

**Homeowners Assisted: 45 Grant Funds Expended/Encumbered: \$ 4,063,280.**

**SHIP Purchase Assistance**

**Totals**

**Assisted: 7 Total Grants Provided: \$360,00.**

**Total Property Value at Purchase: \$1,656,000.**

CDBG covers the years 2019 to date. Because public improvement/facilities projects are phased over multiple PYs funding totals for Public Improvements were drawn from the IDIS PR02 for accuracy.

**CDBG Public Improvements PY 2019 to YTD: Southwest Focal Point Improvements, Senior Residences, the 501 Building Improvements/Clinic.  
Funds Expended: \$2,635,177.**

**Senior Transportation Program PY 2019 to YTD:  
Avg. number of persons served each PY 569 Funds Expended \$818,933.**

**CDBG Residential Rehab: PY 2019 to YTD. Homeowners assisted: 12.  
Funds Expended: \$847,441.**



**Community  
Redevelopment  
Associates  
of Florida, Inc.**

**City of Pembroke Pines**

**RFQ #PL-25-01-01**

**Grant Administration for Community Redevelopment Projects**

**Request for Qualifications**

**Date: 11/18/2025**

**Name of Firm: Community Redevelopment Associates of Florida Inc.**

**Contact Person: Martin Larsen, President/CEO**

**Telephone Number: 954-609-2677**

**Email Address: [bossat1@earthlink.net](mailto:bossat1@earthlink.net)**



## **Our Leadership Team**

### **Martin R. Larsen Co-Founder, President/CEO**

Mr. Larsen has an extensive background in finance, housing and housing related issues, management, and commercial real estate. He has held such corporate financial management positions as Chief Financial Officer, Vice President of Finance, and Comptroller in firms generating revenues in excess of \$20 million.

## **Qualifications and Prior Experience**

- University of Miami, Business Admin / Marine Biology, Miami, Fl. 1967-1971
- Additional Studies:
  - Rutgers University
  - Nova University
  - Broward Community College
  - Miami Dade Community College
- Past Member, American Association of Political Consultants
- Licensed Real Estate Broker

## **Example Projects**

- Analysis of Impediments to Fair Housing Choices, City of Pembroke Pines
- Successful challenge to the U.S. Census population estimates for the City of Margate
- Successful challenge to the U.S. Census population estimates for Collier County
- Developed the Housing Availability/Rent Survey element, HRS District #10, ADM Housing Needs Assessment Project, Broward County, Florida
- Member, City of Pembroke Pines Economic Development Mission to Astrakhan Russia
- City of Pembroke Pines' Pre-Development Loan Program Application
- Developed "Alternative Funding Sources" and "Demographics and Market Data" studies Senior Center project, City of Pembroke Pines
- Review Partner, Entitlement (CDBG) Project, City of Pembroke Pines
- Review Partner, Entitlement (CDBG) Project, City of Tamarac
- Review Partner, Entitlement (CDBG) Project, City of Miramar
- Review Partner, Entitlement (CDBG) Project, City of Coconut Creek
- Review Partner, Entitlement (CDBG) Project, City of Miami Beach
- Financial analysis/pro-forma, for \$3.6 million Industrial Revenue Bond for 80,000 square foot warehouse - office facility in Broward County, Florida
- Developed proprietary database tracking and management system for purchase assistance and housing rehabilitation programs

**Larsen Cont.****Community Service:**

- Chairman, Planning and Zoning Advisory Board, City of Pembroke Pines, FL, 1995/96, 1996/97, 1997/98, 1998/99, 1999/00
- Member, Planning and Zoning Advisory Board, City of Pembroke Pines, FL 1989 – 2000  
Vice Chairman, Consumer Affairs Advisory Board, City of Pembroke Pines, FL 1990/91
- Statewide Task Force on Affordable Housing, 1990
- Statewide Housing Needs Task Force, 1991/92  
(Realtor Working Group on Sadowski Affordable Housing Act)
- Chairman of the Board/President Florida Division, American Cancer Society, 2008 – 09
- Member, Board of Directors and Executive Committee, Broward Unit, American Cancer Society, 1995 - Present
- Member, Board of Directors and Executive Committee, Florida Division, American Cancer Society, 1998 – 2010
- President, Broward Unit, American Cancer Society, 2003-04
- Chairman, Smoke-Free for Health, Inc., - Constitutional Amendment Initiative 6, eliminating the health hazards of second-hand smoke from enclosed indoor workplaces
- Chairman, Advocacy and Public Policy, Florida Division, American Cancer Society 2000/01, 2001/02
- Chairman, Public Issues, American Cancer Society, Broward County 1995/96, 1996/97
- Southeastern Regional Representative for Public Issues, Florida Division, American Cancer Society 1997/98, 1998/99, 1999/00
- Past Member, Consultant review committee, Broward County School Board
- Chairman, Legislative Affairs Committee, Miramar/Pembroke Pines Chamber of Commerce, 1989/90, 1990/91, 1991/92, 1992/93
- Chairman, Finance and Budget Committee, Hollywood Area Board of Realtors, 1988/89, 1989/90
- Chairman, Government Affairs Committee, Hollywood Area Board of Realtors, 1990/91, 1991/92

**Trainings**

- **CDBG - Integrated Disbursement and Information System (IDIS) [HUD]**
- **CDBG - Consolidated Plan and Program Management (HUD)**
- **CDBG - Creating Homeownership Opportunities: HOME, HOPE 3, and CDBG (HUD)**
- **CDBG - Fair Housing Training (HUD)**
- **Growth Management, Development Patterns and Urban Sprawl. (Lincoln Land Institute)**

Note: The eCon Planning suite is integrated into IDIS. As such there is no Community 2020 Community Planning software or Consolidated Management Planning Tool.

## **Staff Snapshot Bio's**

### **Virginia Bermudez - Community Development Coordinator**

- ***Virginia has been with CRA for more than 13 years.*** Originally hired as an administrative assistant, she continually climbed the ranks; subsequently holding positions of increasing responsibility - Program Specialist, Senior Program Specialist, and currently Community Development Coordinator. She is also a corporate officer as an Asst. Secretary/Asst. Treasurer. Prior to her arrival at CRA, she worked in a variety of corporate administrative positions including as a accounting assistant. Virginia is bilingual in English and Spanish.

### **Denise Creary - Community Development Coordinator**

- ***Denise has been with CRA for more than 13 years.*** Originally hired as a Community Development Specialist, she excelled and is now a Community Development Coordinator. Denise created the policies and procedures for the Home-buyer purchase assistance programs. She is also a corporate officer as an Asst. Secretary/Asst. Treasurer, Prior to her arrival at CRA, she spent 14 years as a Senior Mortgage Loan Officer with Bank Atlantic.

### **Mery Sanchez - Senior Program Specialist**

- ***Mery has been with CRA for more than nine (9) years.*** Originally hired as a Program Specialist, she was trained in the various residential rehabilitation programs. Due to her having excelled in that role, she was promoted to her current position in 2019. She is also a corporate officer as an Asst. Secretary/Asst. Treasurer. Prior to her arrival at CRA she held a variety of administrative positions of increasing responsibility and studied Business Administration in Venezuela prior to coming to the U.S. Mery is bilingual in English and Spanish; as well she has taken course work at the Berlitz School of Interpreters.

**Staff Snapshot Bio's Cont.****Nercida Casado - Senior Program Specialist**

- Nercida has been with CRA for more than six (6) years. She came to CRA after having worked for the State of Florida Dept. of Business and Professional Regulation for seven years. A background that included work as a scheduling and logistics specialist, Nercida has the skill set necessary for her present position. She is currently pursuing an Associates of Science Degree in Business Administration at Broward Community College. Additionally, she holds a Certified Professional Coder (CPC) certification from the American Academy of Professional Coders.

<u>Staffing</u>	<u>Position</u>	<u>Responsibilities</u>
<b>Martin R. Larsen</b>	<b>President/CEO</b>	<b>Provides overall daily management and administration</b>
<b>Virginia Bermudez</b>	<b>Community Development Coordinator</b>	<b>IDIS, DRGR, ConPlan/Action Plan, CAPER, Annual Reports, provides administrative support to the CEO</b>
<b>Denise Creary</b>	<b>Community Development Coordinator</b>	<b>DIS, DRGR, ConPlan/Action Plan, CAPER, Annual Reports, Manages Purchase Assistance Grant Program</b>
<b>Mery Sanchez</b>	<b>Senior Program Specialist</b>	<b>Reviews Residential Rehabilitation program work specifications. Manages file archival activities.</b>
<b>Nercida Casado</b>	<b>Seniot Program Specialist</b>	<b>Manages the day-to-day operations related to the Residential Rehabilitation Program.</b>
<b><u>PART TIME SUPPORT PERSONNEL</u></b>		
<b>Dalmari Cantero</b>	<b>Underwriting Support</b>	<b>Reviews program applications, completes third party-verifications, reviews income certifications for main staff.</b>
<b>Jaime Torres</b>	<b>SHIP Program Technical Support</b>	<b>Provides support to staff with regard to SHIP Tracking and Annual Reports; contractor billings.</b>
<b><u>TECHNICAL SUPPORT</u></b>		
<b>Civitas LLC</b>	<b>Civitas LLC is a HUD TA</b>	<b>Provides contracted technical support and ongoing training for staff</b>

## Staff Training and Continuing Education Cont.

### Virginia Bermudez , Community Development Coordinator

- CDBG - Introduction to IDIS for CDBG Grantees (HUD)
- CDBG - Environmental Review Procedures (Civitas on-site training)
- CDBG - CAPER In IDIS (Civitas HUD TA)
- CDBG - Understanding CDBG-CV Funding (HUD)
- CDBG - HUD CDBG-CV (HUD)
- CDBG - Understanding Section 3 (HUD enrolled)
- SHIP - Administration/Annual Reporting (FHC on-site training)
- SHIP - Income Certification Training (FHC-DCA)
- SHIP - The Rehabilitation/Emergency Repair Process (FHC)
- SHIP - Helping Homeowners with COVID-19 SHIP Emergency Assistance (FHC)
- SHIP - COVID-19 Response for Housing and Homelessness in Florida (FHC)
- SHIP - COVID-19 SHIP Rent Assistance Implementation (FHC)
- SHIP - Implementing Effective Rental Assistance Programs with Federal and State Resources (FHC)
- SHIP - Deploying CARES CRF Funds through SHIP JurisdictionsGoToWebinar - Multifamily Programs Workshop for Local Governments
- Pre-Proposal Meeting for Pool of General & Environmental Inspectors
- CDBG CARES Act Webinar Series: Economic Development Program Models
- BIZFIT COVID19 EDITION VIRTUAL SERIES 2 EVENT PARTICIPATION
- GoToWebinar - Disaster Preparation and Recovery with SHIP
- Affordable Housing Advisory Committee (AHAC)
- GoToWebinar - SHIP Program Administration Part 1
- Class: CDBG-CV Best Practices Webinar Series: Economic Development and Assistance to Businesses
- GoToWebinar - Renovation, Repair and Painting Rule – Contractors
- GoToWebinar - One Coalition’s Approach to Transforming Policies, Systems, and Community Investments to Prevent Lead Exposure At-Scale
- GoToWebinar - Launching a New State Lead Exposure Prevention Program
- GoToWebinar - Florida Housing Coalition Hurricane Member Update
- GoToWebinar - Florida Housing Coalition Hurricane Member Update
- GoToWebinar - Florida Housing Coalition Hurricane Member Update
- ERASE Workshop 5
- GoToWebinar - Florida Housing Coalition Hurricane Member Update
- GoToWebinar - Proficiency in Income Qualification Part 1 of 3
- ERASE Workshop #6
- GoToWebinar - Proficiency in Income Qualification Part 2 of 3
- GoToWebinar - Florida Housing Coalition Hurricane Member Update
- GoToWebinar - Proficiency in Income Qualification Part 3 of 3
- Class: 2022 Best Practices for the Consolidated Plan and Action Plan in the eCon Planning Suite
- GoToWebinar - Terms of Assistance
- GoToWebinar - Preparing and Submitting the Annual Report
- GoToWebinar - Creating an Annual Schedule for AHAC Reports
- GoToWebinar - The Rehabilitation/Emergency Repair Process Part 1
- Affordable Housing Funding Sources
- Introduction to HUD Part 58 Environmental Reviews
- Introduction to HUD Part 58 Environmental Reviews

**Staff Training and Continuing Education Cont.****Virginia Bermudez , Community Development Coordinator**

- **GoToWebinar - Increasing Minority Homeownership**
- **GoToWebinar - Shared Equity**
- **GoToWebinar - Overview of the Live Local Act**
- **FHC Hurricane & Resilience Webinars**
- **GoToWebinar - Preparing and Submitting the SHIP Annual Report**
- **GoToWebinar - Proficiency in Income Qualification Part 1**
- **GoToWebinar - Proficiency in Income Qualification Part 2**
- **GoToWebinar - Preparing for Increased SHIP Funding**
- **GoToWebinar - The Rehabilitation/Emergency Repair Process**
- **Virtual SHIP Administrators Roundtable**
- **GoToWebinar - Income Qualification Rule Changes in 2024**
- **GoToWebinar - SHIP Program Administration Part 1**
- **GoToWebinar - SHIP Program Administration Part 2**
- **GoToWebinar - SHIP File Documentation**
- **GoToWebinar - SHIP File Documentation Proficiency in Income Qualification - Pompano Beach Cultural Arts Center 50 W. Atlantic Blvd. Pompano Beach, FL 33060**
- **GoToWebinar - Preparing for the SHIP Monitor**
- **US Department of Housing and Urban Development: Healthy Homes Training and Discussion**
- **New SHIP Staff Orientation & Training**
-

## Staff Training and Continuing Education Cont.

### Denise Creary, Community Development Coordinator

- **CDBG - Introduction to IDIS for CDBG Grantees (HUD)**
- **CDBG - Environmental Review Procedures (Civitas on-site training)**
- **CDBG - CAPER In IDIS (Civitas HUD TA)**
- **CDBG - Understanding CDBG-CV Funding (HUD)**
- **CDBG - HUD CDBG-CV (HUD)**
- **CDBG - CDBG-CV workshop - (NCDA)**
- **CDBG - Labor Relations/Davis-Bacon Compliance Training (HUD)**
- **CDBG - Understanding Section 3 (HUD enrolled)**
- **SHIP - Administration/Annual Reporting (FHC on-site training)**
- **SHIP - Income Certification Training (FHC-DCA)**
- **SHIP - The Rehabilitation/Emergency Repair Process (FHC)**
- **SHIP - Helping Homeowners with COVID-19 SHIP Emergency Assistance (FHC)**
- **SHIP - COVID-19 Response for Housing and Homelessness in Florida (FHC)**
- **SHIP - COVID-19 SHIP Rent Assistance Implementation (FHC)**
- **SHIP - Implementing Effective Rental Assistance Programs with Federal and State Resources (FHC)**
- **SHIP - Deploying CARES CRF Funds through SHIP Jurisdictions**
- **SHIP - Lender Closing Disclosure Training (Housing Foundation)CDBG – IDIS training modules (HUD ongoing-virtual)**
- **CDBG – Buy America, Build America (Live Local – HUD/virtual)**
- **CDBG – Environmental Review Procedures (HUD/virtual – ongoing)**
- **CDBG – CAPER in IDIS (HUD/virtual)**
- **CDBG – Understanding Section 3 (HUD – ongoing – virtual)**
- **CDBG – ConPlan & AAP Training (HUD, Broward County, etc)**
- **HOME – Underwriting and subsidy layering guidelines update (HUD)**
- **NLIHC – ongoing virtual training and updates (virtual)**
- **SHIP – Preparing and submitting Annual Report (annual FHC)**
- **SHIP/HUD – Income Certification along with HOTMA updates training (FHC – ongoing, virtual & in-person)**
- **SHIP – AHAC virtual training & Elected Official Regional Workshop (FHC – annual) and in-person annual meeting**
- **SHIP – Sadowski virtual training (FHC – ongoing)**
- **SHIP – Making Purchase Assistance Housing Programs Market Responsive (FHC – virtual)**
- **SHIP – Housing Forward Town Hall Series w/breakout sessions (FHC – Virtual)**
- **SHIP – Shared Equity, Strategic Planning, CLT Best Practices (FHC, other organizations)**
- **SHIP – LHAP training updates (FHC – annual)**
- **SHIP – Affordable Housing Laws and guidance (FHC)**
- **SHIP/HUD – Federal Grant Trigger Words Replacement Training**
- **Broward Housing Council Affordable Housing Workshop/training – annual (in person)**
- **Broward Housing Workshop (in person)**
-

## Staff Training and Continuing Education Cont.

### Mery Sanchez, Senior Program Specialist

- CDBG - Exploring IDIS (FHC sponsored)
- CDBG - Introduction to IDIS for CDBG Grantees (HUD)
- CDBG - Environmental Review Procedures (Civitas on-site training)
- CDBG - Setting up a Substantial Amendment for CARES Act Funding (HUD)
- CDBG - Lead Based Paint Visual Assessment Training (HUD enrolled)
- SHIP - SHIP Program Administration (FHC Riviera Beach)
- SHIP - Administration/Annual Reporting (FHC on-site training)
- SHIP - COVID-19 Tracking SHIP Funds
- SHIP - Taking Your Government Function Online (Sadowski)
- SHIP - Income Certification Training (FHC-DCA)
- SHIP - The Rehabilitation/Emergency Repair Process (FHC)
- SHIP - Helping Homeowners with COVID-19 SHIP Emergency Assistance (FHC)
- SHIP - COVID-19 Response for Housing and Homelessness in Florida (FHC)
- SHIP - Assisting Homeless and Special Need Populations Through COVID-19 (FHC)
- SHIP - COVID-19 SHIP Rent Assistance Implementation (FHC)
- SHIP - Implementing Effective Rental Assistance Programs with Federal and State Resources (FHC)
- SHIP - Mortgage Assistance Implementation (FHC)
- SHIP - Eviction Protections During COVID-19 Crisis (FHC)
- SHIP - COVID-19 Virtual SHIP (FHC)
- SHIP - Building a Coordinated Plan to Deploy Federal/State Rental Assistance (FHC)
- SHIP - Deploying CARES CRF Funds through SHIP Jurisdictions (FHC)
- SHIP Program Administration. Part I, ,
- SHIP Staff Orientation-
- Preparing for SHIP monitor
- SHIP Staff Orientation
- Monitoring Rental Housing Part II
- Overview of SHIP Rehabilitation Strategy and Preparing for SHIP monitor
- Rehabilitation Strategy
- Proficiency in Income Qualification, in person
- SHIP Monitor
- HOTMA TRAINING
- Heirs Property.
- SHIP Staff Orientation.
- Basically CDBG Online In progress
- Yes, in God's Backyard, A New Tool for Affordable Housing
- Income Qualification Part I
- Income Qualification Part II
- SHIP for Rental Housing
- The Rehabilitation-Emergency Repair Process
- Tune Up Your Homebuyer Program
-

## Staff Training and Continuing Education Cont.

### Nercida Casado, Program Specialist

- CDBG - Exploring IDIS (FHC sponsored)
- CDBG - Introduction to IDIS for CDBG Grantees (HUD)
- CDBG - Environmental Review Procedures (Civitas on-site training)
- CDBG - Setting up a Substantial Amendment for CARES Act Funding (HUD)
- SHIP - SHIP Program Administration (FHC Riviera Beach)
- SHIP - Administration/Annual Reporting (FHC on-site training)
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- SHIP - Mortgage Assistance Implementation (FHC)
- SHIP - Eviction Protections During COVID-19 Crisis (FHC)
- SHIP - COVID-19 Virtual SHIP (FHC)
- SHIP - Building a Coordinated Plan to Deploy Federal/State Rental Assistance (FHC)
- SHIP - Deploying CARES CRF Funds through SHIP Jurisdictions (FHC)• Affordable Housing Funding Sources
- Best SHIP Practices in Serving Special Needs and Homeless Households
- Financing and Monitoring Rental Housing with SHIP
- Financing and Monitoring Rental Housing with SHIP
- Finding and Retaining Rehabilitation Contractors
- How to Build a Sustainable SHIP Program
- Income Qualification Rule Changes in 2024
- New Annual Reporting of SHIP Applications
- New SHIP Staff Orientation
- Preparing and Submitting the SHIP Annual Report
- Preparing for the SHIP Monitor
- Proficiency in Income Qualification
- SHIP Affordable Housing Laws and Guidance
- SHIP File Documentation
- SHIP Program Administration
- SHIP Rent Limits Policy
- SHIP Rental Assistance
- The Rehabilitation/Emergency Repair Process
- The Rehabilitation/Emergency Repair Process
- Tracking SHIP Activity Throughout the Year
-

Understood and Confirmed.



COMMUNITY REDEVELOPMENT ASSOCIATES  
OF FLORIDA, INC.  
8569 PINES BLVD, STE #201  
PEMBROKE PINES FL 33024

**CITY OF PEMBROKE PINES**  
601 CITY CENTER WAY, LBTR-4TH FLOOR  
PEMBROKE PINES, FL 33025

# LOCAL BUSINESS TAX RECEIPT

## Local Business Tax Certificate

In the event the business to which this receipt was issued changes hands, the receipt will become null and void. An application for a new receipt must be made.

**Receipt Date: October 1, 2025 through September 30, 2026**

**Business Name:** COMMUNITY REDEVELOPMENT **DBA:**  
ASSOCIATES OF FLORIDA, INC.

**Business Location:** 8569 PINES BLVD, #201-208 & #210  
PEMBROKE PINES, FL 33024

**Receipt Number:** 20070285-2022-1

**Invoice Number:** INV-00110930

**Business Description:** CONSULTANT TO NON-PROFIT & MUNICIPAL

**Receipt Issued:** Issued on 8/20/2025 12:18:48 AM

**Receipt Expiration:** Expires on 9/30/2026

### Business Classifications

PCL-Consultant

SIGN-Sign



# *State of Florida*

## *Department of State*

I certify from the records of this office that COMMUNITY REDEVELOPMENT ASSOCIATES OF FLORIDA, INC. is a corporation organized under the laws of the State of Florida, filed on April 18, 1990.


The document number of this corporation is L66074.

I further certify that said corporation has paid all fees due this office through December 31, 2025, that its most recent annual report/uniform business report was filed on February 4, 2025, and that its status is active.

I further certify that said corporation has not filed Articles of Dissolution.

*Given under my hand and the  
Great Seal of the State of Florida  
at Tallahassee, the Capital, this  
the Fourth day of February, 2025*



  
Secretary of State

Tracking Number: 2925887524CC

To authenticate this certificate, visit the following site, enter this number, and then follow the instructions displayed.

<https://services.sunbiz.org/Filings/CertificateOfStatus/CertificateAuthentication>



Ron DeSantis, Governor

Melanie S. Griffin, Secretary



**STATE OF FLORIDA  
DEPARTMENT OF BUSINESS AND PROFESSIONAL REGULATION**

**DIVISION OF REAL ESTATE**

THE CORPORATION HEREIN HAS REGISTERED UNDER THE  
PROVISIONS OF CHAPTER 475, FLORIDA STATUTES

**COMMUNITY REDEVELOPMENT ASSOCIATES OF FLA INC**

8569 PINES BLVD STE 201  
PEMBROKE PINES FL 33024

**LICENSE NUMBER: CQ1008302**

**EXPIRATION DATE: MARCH 31, 2026**

Always verify licenses online at [MyFloridaLicense.com](http://MyFloridaLicense.com)

ISSUED: 01/16/2024

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Ron DeSantis, Governor

Melanie S. Griffin, Secretary



**STATE OF FLORIDA  
DEPARTMENT OF BUSINESS AND PROFESSIONAL REGULATION**

**DIVISION OF REAL ESTATE**

THE BROKER HEREIN IS LICENSED UNDER THE  
PROVISIONS OF CHAPTER 475, FLORIDA STATUTES

**LARSEN, MARTIN RAYMOND**

4508 DEARBORN HILLS DR N E  
RIO RANCHO NM 87144

**LICENSE NUMBER: BK490637**

**EXPIRATION DATE: SEPTEMBER 30, 2026**

Always verify licenses online at [MyFloridaLicense.com](http://MyFloridaLicense.com)

ISSUED: 09/13/2024

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**CERTIFICATION REGARDING LOBBYING;  
DEBARMENT, SUSPENSION AND OTHER RESPONSIBILITY MATTERS  
FOR EXPENDITURE OF FEDERAL FUNDS**


**LOBBYING**

As required by 7 CFR Part 3018, for persons entering into a contract, grant or cooperative agreement over **\$100,000** involving the expenditure of Federal funds, the undersigned certifies for itself and its principals that:

- (a) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
- (b) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress or an employee of a Member of Congress, in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit **Standard Form - LLL, "Disclosure Form to Report Lobbying,"** in accordance with its instructions; and
- (c) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

The undersigned Contractor, certifies or affirms the truthfulness and accuracy of each statement of its certification and disclosure, if any. In addition, the Contractor understands and agrees that the provisions of 31 U.S.C. Chap. 38, Administrative Remedies for False Claims and Statements, apply to this certification and disclosure, if any.



Signature of Contractor's Authorized Official

Community Redevelopment Associates of Florida Inc.

Contractor / Name of Company

Martin Larsen President/CEO

Printed Name and Title of Contractor's Authorized Official

11/10/25

Date

**DEBARMENT, SUSPENSION AND OTHER RESPONSIBILITY MATTERS**

As required by 7 CFR Part 3017, for persons entering into a contract, grant or cooperative agreement over **\$25,000** involving the expenditure of Federal funds, the undersigned certifies for itself and its principals that:

- (a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any Federal department or agency;
- (b) Have not within a three-year period preceding this application been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State, or local) transaction or contract under a public transaction; violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;
- (c) Are not presently indicted for or otherwise criminally or civilly charged by a Government entity (Federal, State, or local) with commission of any offenses enumerated in paragraph (b) of this certification; and
- (d) Have not within a three-year period preceding this application had one or more public transaction (Federal, State, or local) terminated for cause or default; and

Where the applicant is unable to certify to any of the statements in this certification, he or she shall attach an explanation to this application.



Signature of Contractor's Authorized Official

Community Redevelopment Associates of Florida Inc.

Contractor / Name of Company

Martin Larsen President/CEO

Printed Name and Title of Contractor's Authorized Official

11/10/25

Date



# Community Redevelopment Associates of FL. Inc. Response

*Pricing unsealed at Nov 18, 2025 2:37 PM*

## CONTACT INFORMATION

Company

Community Redevelopment Associates of FL. Inc.

Email

bosscat1@earthlink.net

Contact

Martin Larsen

Address

8569 Pines Blvd.

Ste. 201

Pembroke Pines, FL 33024

Phone

(954) 609-2677

Website

<https://www.crafla.com>

Submission Date

Nov 17, 2025 12:15 PM (Eastern Time)

## ADDENDA CONFIRMATION

*No addenda issued*

## QUESTIONNAIRE

### 1. CONFIRMATION TO BIND

**1.1. I certify that I have read, understood and agree to the terms in this solicitation, and that I am authorized to submit this response on behalf of my company.\***

Confirmed

Pass  Fail

### 2. CERTIFICATION OF INSURANCE COMPLIANCE AND INTENT TO PROCURE REQUIRED COVERAGE

NOTE: Vendors are not required to purchase any additional insurance in order to submit a bid. However, they must certify that they either currently hold, or are able and willing to obtain, all required insurance coverages, endorsements, and limits prior to award and execution of the contract.

**2.1. I certify that, if awarded this contract, I will be required to obtain and maintain all insurance policies as detailed in the INSURANCE REQUIREMENTS Section of this solicitation before any work may commence, and throughout the life of the contract.\***

Confirmed

Pass  Fail

**2.2. Do you confirm that you will only use insurance carriers licensed to do business in the State of Florida and rated no less than "A" as to management, and no less than "Class VI" as to financial strength by A.M. Best, and that you understand all endorsements required (e.g., Additional Insured, Waiver of Subrogation, etc.) must be included?\***

Yes

Pass  Fail


**2.3. Do you currently carry insurance policies that meet or exceed the minimum requirements outlined in the INSURANCE REQUIREMENTS section of this solicitation?\***

Yes

Pass  Fail

**2.3.1. Please upload your current certificate(s) of insurance that demonstrate compliance with the insurance requirements outlined in this solicitation.\***

Pass  Fail

 [Certificate\\_of\\_Liability\\_Insurance\\_for\\_City\\_of\\_Pembroke\\_Pines.pdf](#)

**2.4. Do you believe you are exempt from one or more insurance requirements (e.g., Workers' Compensation)?\***

No

Pass  Fail

**2.5. Do you plan on using subcontractors for this project?\***

No

Pass  Fail

### 3. EXPERIENCE AND CAPABILITIES

The relative experience and qualification of each applicant's proposed team, with respect to the project scope, will be judged and a relative rating assigned. This parameter expresses the general and specific project-related capability of the team and indicates the adequate depth and abilities of the organization which it can draw upon as needed. This will include management, technical, and support staff.

**3.1. Explain your firm's interest in working on this project, a positive commitment to perform the required work and a description of the firm.\***

See *Letter of Interest Executive Summary* Attachment

Pass  Fail

**3.2. Describe the size of your firm.\***

Four full time, one part-time along with two technical support personnel

Pass  Fail

**3.3. Describe your firm's financial history, strength and stability.\***

Community Redevelopment has been in business for 35 years. The programs administered by CRA have been audited at the local, State and Federal level. CRA does not have any pending disciplinary action within any Federal, local or State regulatory body or professional organization. In addition there has never been a claim made against our professional liability insurance.

Pass  Fail

**3.4. Describe your firm's range of activities.\*** Pass  Fail

We are a one-stop shop. Administration, regulatory compliance, Consolidated Plan/Action Plan preparation, IDIS management, management of program general contractors for Residential Rehabilitation programs, administration of First-time Homebuyers programs, provision of direct services to HOME residential rehabilitation and purchase assistance programs.

**3.5. Describe the specialized experience and technical competence of the firm or persons with respect to working on similar projects.\***

Please see the uploaded documents *Firm History, Experience and Management Approach and Staff Qualifications, Experience and Trainings*  Pass  Fail

**3.6. Do you have a minimum of two (2) years of experience? Please provide proof of such experience.\***

Community Redevelopment has been in continuous operation for 35 years. *In many instances, due to our longevity, contact persons in prior client cities are no longer with those grantees.*  Pass  Fail

**3.7. The firm must provide information on their proximity to and familiarity with the area in which the project is located.\***

Community Redevelopment has its offices at 8569 Pines Blvd. Ste. 201 Pembroke Pines. We have maintained our offices in Pembroke Pines for the entire 35 years of operation. As a former Chairman of the city's Planning and Zoning Board, and having previously resided in Pembroke Pines for 45 years, I am thoroughly familiar with the city.  Pass  Fail

**3.8. Explain the availability and access to the firm's top level management personnel.\*** Pass  Fail

Community Redevelopment Associates office is located in Pembroke Pines. Its two most senior staff, Virginia Bermudez and Denise Creary are available at the office, by phone and by email on a daily basis. President/CEO Martin Larsen is available daily by phone, email and Teams.

**3.9. Identify the contact person and supervisory personnel who will work on the various projects, including the relative experience of all professionals proposed for use on the team.\***

Virginia Bermudez, Community Development Coordinator (954) 431-3559 [VBermudez@crafla.org](mailto:VBermudez@crafla.org); Denise Creary Community Development Coordinator (954) 431- 6012 [DCreary@crafla.org](mailto:DCreary@crafla.org); Nercida Casado (954) 431-3937 [NCasado@crafla.org](mailto:NCasado@crafla.org);  Pass  Fail

Martin Larsen, CEO (954) 609-2677 [bossnat1@earthlink.net](mailto:bossnat1@earthlink.net) Please see uploaded document *Staff Qualifications, Experience and Trainings*

**3.10. Provide summaries of key persons and on-site staff to be assigned to the project with emphasis on their experience with similar work.\***

Please see uploaded document *Staff Qualifications, Experience and Trainings*.

 Pass  Fail**3.11. Explain the ability and experience of the field staff with specific attention to project related experience.\***

Virginia Bermudez has been responsible for the day-to-day administration of the IDIS system, the CAPER report, contact individual for client Finance Departments etc. for cities such as Pembroke Pines, Miramar, and Coconut Creek. Denise Creary, utilizing her extensive banking experience has administered the  Pass  Fail

First-time Homebuyers programs for the aforementioned grantees and others. Nercida Casado has managed the Residential Rehabilitation programs for the aforementioned grantees in conjunction with Mery Sanchez. Please see the uploaded document *Staff Qualifications, Experience and Trainings*.

**3.12. Contractor should list any applicable qualification, including education, experience, honors and awards received, and professional associations of which the firm and/or its personnel are members.\***

Please see uploaded document *Staff Qualifications, Experience and Trainings*.

Pass  Fail

**3.13. Provide the recent, current, and projected workload of the firm.\***

Pass  Fail

We are currently administering and implementing the expenditure of \$2,316,102.00 in federal and state funding for Pembroke Pines. While numbers may vary slightly depending on reporting date, we have 20 residential rehabilitation projects underway, 2 purchase assistance grants under review, and an additional 50 homeowners on the waiting list awaiting additional funding. Please see uploaded document *SHIP and CDBG Expenditures Homeowners Assisted*.

**3.14. What is your reputation compared to your peers in the market?\***

Pass  Fail

Community Redevelopment Associates reputation and credibility are unmatched. The programs administered by CRA have been audited at the local, State and Federal level. CRA does not have any pending disciplinary action within any Federal, local or State regulatory body or professional organization. In addition there has never been a claim made against our professional liability insurance.

**3.15. What is your reputation like among customers and how have you developed it?\***

Pass  Fail

We are noted for being strict adherents to federal and state regulations. When engaged to "fix" a grantee's programs, we are often asked to "give us what Pembroke Pines has."

**3.16. How does your service differ from similar competitors? How do you win and retain business?\***

Our systems have been developed to parallel the related federal and state regulations. We have proven policies and procedures covering programmatic activities that allow us to be plug and play in any situation. Our fees are reasonable and result in a cost savings to the client.

Pass  Fail

**3.17. A brief statement must be included which explains why your proposal would be the most effective and beneficial to the City of Pembroke Pines.\***

Please see uploaded *Letter of Interest Executive Summary*.

Pass  Fail

**4. FIRM'S UNDERSTANDING AND APPROACH TO THE WORK**

The understanding that the applicant and consultants demonstrate as to the requirements and needs of the project, including an evaluation of the thoroughness demonstrated in analyzing and investigating the scope of the project.

**4.1. Provide a narrative statement demonstrating an understanding of the overall intent of this solicitation, as well as the methods used to complete assigned tasks.\***

This solicitation requires the successful bidder to undertake all aspects of the administration and *implementation* of the SHIP, CDBG, HOME and NSP programs. More specifically, the successful bidder must be capable of managing all aspects of the Residential Rehabilitation program, from income certifying homeowners, working with program inspectors on the creation of appropriate work specifications, coordinating the general contractor pool, guiding the homeowner through the process, mediating contractor/homeowner disputes and

Pass  Fail

seeing the individual projects through to completion. This is also true with regard to all aspects of the First-time Homebuyers program - from income certification to eventually closing, review of all attendant documents etc. See uploaded document *Firm History, Experience and Management Approach*.

---

**4.2. Please clearly describe all aspects of the project proposed.\*** Pass  Fail

This solicitation requires the successful bidder to undertake all aspects of the administration and *implementation* of the SHIP, CDBG, HOME and NSP programs. More specifically, the successful bidder must be capable of managing all aspects of the Residential Rehabilitation program, from income certifying homeowners, working with program inspectors on the creation of appropriate work specifications, coordinating the general contractor pool, guiding the homeowner through the process, mediating contractor/homeowner disputes and seeing the individual projects through to completion. This is also true with regard to all aspects of the First-time Homebuyers program - from income certification to eventually closing, review of all attendant documents etc. See uploaded document *Firm History, Experience and Management Approach*.

---

**4.3. Include details of your approach and work plans.\*** Pass  Fail

We follow the procedures laid out in our policy and procedure manuals which are extensive in scope. All milestones are laid out in the annual planning calendar. See attached example of just one of our policy and procedure manuals regarding environmental reviews - *Community Redevelopment Assoc Environmental Review Policies Procedures and Training Manual*.

---

**4.4. How would you organize this project in terms of milestones?\*** Pass  Fail

We maintain a detailed planning calendar encompassing all annual milestones. A copy of the current calendar is included in proposal. See attached *Example Pines Planning Calendar*.

---

**4.5. Identify any issues or concerns of significance that may be appropriate.\*** Pass  Fail

Whether residential rehabilitation, purchase assistance, or public improvement projects are facing adverse headwinds. Supply chain issues and increasing materials costs are impacting residential rehabilitation projects. Increased borrowing costs are pinching the ability of first-time homebuyers to purchase. Public improvement projects also face supply chain and cost issues. We bring our 35 years of experience to steering the city through those issues.

---

**4.6. How do you ensure the quality of your services?\*** Pass  Fail

Community Redevelopment Assoc. has developed over 35 years of operation, detailed policy and procedure manuals which staff follows strictly resulting in quality outcomes. Staff undergo continuous technical training as shown in the additional uploaded documents.

---

**4.7. What criteria do you use to measure your quality?\*** Pass  Fail

The satisfaction of the citizens and clients we serve. No grantee, while administered by Community Redevelopment Assoc. has ever failed to meet the CDBG timeliness test, failed to meet state requirements, or had to remit to the US Treasury any funds due to improper expenditure.

---

**4.8. How often do you find mistakes or errors in your work and what is done to correct these errors, and what is the average correction time?\***

Any work product is reviewed by at least two members of staff. Errors are corrected immediately.  Pass  Fail

---

**4.9. Describe the firm's techniques for quality control. At a minimum describe the firm's technique to control design and contract documentation, including record keeping.\***

We have highly customized the ACT! CRM software to provide a detailed digital database that is used  Pass  Fail to track all program data, and is used in conjunction with hard copy files. The structure of each file is such that our method was adopted many years ago as a standard for grantees by the SHIP program. Digital record keeping is the preferred HUD method.

## 5. PREVIOUS EXPERIENCE

In this section, vendors are required to provide a detailed account of their previous experience relevant to the services outlined in this solicitation. The aim is to assess the vendor's capability and track record in delivering similar projects.

### 5.1. How many clients have you provided Services for?\*

Pass  Fail

22

### 5.2. What similar or related projects have you worked on within the past three years?\*

Pass  Fail

Provided Administration and Program Implementation services to the City of Pembroke Pines with regard to CDBG, SHIP, HOME and NSP.

### 5.3. What challenges did you face and how did you overcome them?\*

Pass  Fail

The biggest challenge to date was dealing with the consequences of the COVID-19 pandemic. The development of the 501 Building for the provision of pandemic related clinic services to the city's residents was a major achievement.

### 5.4. How many of your clients are repeat clients?\*

Pass  Fail

We have worked with 17 of the 22 over the 35 years of our operation.

### 5.5. How much of your revenue is derived from managing projects similar to ours?\*

Pass  Fail

100%

### 5.6. Please describe the past record of performance of the firm or person with respect to accessibility to clients, ability to meet schedules, communication, and coordination skills. \*

See uploaded document *Firm History, Experience and Management Approach*. We are always  Pass  Fail readily available to our clients, strictly adhere to our planning calendars, and actively keep our clients informed of regulatory changes, as well as being willing to say no to a client when it may be moving in contradiction to federal or state regulations. As a direct result, while we have been the administrators of their programs no client has failed to meet CDBG timeliness (COVID-19 excluded,) or have been required to repay funds to either the federal or state governments for inappropriate expenditures. As we continually state - "Our job is to protect the taxpayers money."

## 6. REFERENCE # 1

This is a highly specialized service that requires advanced knowledge of HUD regulations and procedures. Rather than focusing solely on the number of years the firm has been in business, we are particularly interested in the qualifications and relevant experience of the proposed team members. Please provide specific examples of comparable, licensed work completed by key staff, ideally aligned in scope and complexity. At least five references from the past five years should be included, capable of speaking to your team's ability to successfully deliver services of this nature. As part of the proposal evaluation process, the City may conduct an investigation of references, including a record check or consumer affairs complaints. Proposers' submission of a proposal constitutes

acknowledgment of the process and consent to investigate. The City is the sole judge in determining Proposers qualifications. In this section you will have the ability to enter information for 5 different references including their contact details and specific project information.

Please note that the City prefers references who are not current employees of the City of Pembroke Pines, as we generally do not contact our own employees for reference checks.

Proposers are advised to confirm that:

1. Each reference provided by the Respondent has up to date contact persons and contact information;
2. The contact person provided for each reference is someone who has personal knowledge of the Proposer's performance during the referenced project; and
3. The contact person for each reference has been contacted by the Proposer regarding this specific bid submittal and such person confirmed their willingness to serve as a reference.

**6.1. Reference Contact Information - Name of Firm, City, County or Agency\***

Pass  Fail

City of Coconut Creek FL

**6.2. Reference Contact Information - Reference's Business Address\***

Pass  Fail

4800 West Copans Rd. Coconut Creek FL 33063

**6.3. Reference Contact Information - Reference's Contact Name & Title\***

Pass  Fail

W. Scott Stoudenmire Deputy City Manager

**6.4. Reference Contact Information - Reference's E-mail Address\***

Pass  Fail

SStoudenmire@coconutcreek.gov

**6.5. Reference Contact Information - Reference's Phone Number\***

Pass  Fail

954-973-6720

**6.6. Project Information - Was your firm the prime contractor for the listed project?\***

Pass  Fail

Yes

**6.7. Project Information - Name of Contactor Performing the Work\***

Pass  Fail

Community Redevelopment Associates of Florida Inc.

**6.8. Project Information - Name and location of the project\***

Pass  Fail

CDBG, SHIP, NSP and HOME City of Coconut Creek, citywide

**6.9. Project Information - Nature of the firm's responsibility on the project and work for which staff was responsible for\***

Administration of CDBG, SHIP and various other projects. HOME Direct Service Delivery

Pass  Fail

**6.10. Project Information - Project Duration\***

Pass  Fail

2005 - 2020

**6.11. Project Information - Completion (Anticipated) Date\*** Pass  Fail

2020

**6.12. Project Information - Size of Project\*** Pass  Fail

In excess of \$8,000,000 in funding

**6.13. Project Information - Cost of Project\*** Pass  Fail

\$969,306

**7. REFERENCE # 2****7.1. Reference Contact Information - Name of Firm, City, County or Agency\*** Pass  Fail

City of Plantation FL

**7.2. Reference Contact Information - Reference's Business Address\*** Pass  Fail

400 NW 73rd Ave. Plantation FL

**7.3. Reference Contact Information - Reference's Contact Name & Title\*** Pass  Fail

Danny Holmes Director Planning, Zoning and Economic Development

**7.4. Reference Contact Information - Reference's E-mail Address\*** Pass  Fail

dholmes@plantation.org

**7.5. Reference Contact Information - Reference's Phone Number\*** Pass  Fail

954-513-3509

**7.6. Project Information - Was your firm the prime contractor for the listed project?\*** Pass  Fail

Yes

**7.7. Project Information - Name of Contactor Performing the Work\*** Pass  Fail

Community Redevelopment Associates of Florida Inc.

**7.8. Project Information - Name and location of the project\*** Pass  Fail

SHIP program Administration, CDBG Direct Services and various projects

**7.9. Project Information - Nature of the firm's responsibility on the project and work for which staff was responsible for\***

SHIP program administration and implementation

 Pass  Fail**7.10. Project Information - Project Duration\*** Pass  Fail

1998 - 2020

**7.11. Project Information - Completion (Anticipated) Date\*** Pass  Fail

2020

**7.12. Project Information - Size of Project\*** Pass  Fail

Approximately \$10,000,000

**7.13. Project Information - Cost of Project\*** Pass  Fail

\$1,067,531.00

**8. REFERENCE # 3****8.1. Reference Contact Information - Name of Firm, City, County or Agency\*** Pass  Fail

City of Deerfield Beach FL

**8.2. Reference Contact Information - Reference's Business Address\*** Pass  Fail

325 NW 2nd Ave Deerfield Beach FL 33441

**8.3. Reference Contact Information - Reference's Contact Name & Title\*** Pass  Fail

Jonathan Salas

**8.4. Reference Contact Information - Reference's E-mail Address\*** Pass  Fail

CommunityServices@deerfield-beach.com

**8.5. Reference Contact Information - Reference's Phone Number\*** Pass  Fail

954-480-4464

**8.6. Project Information - Was your firm the prime contractor for the listed project?\*** Pass  Fail

Yes

**8.7. Project Information - Name of Contactor Performing the Work\*** Pass  Fail

Community Redevelopment Associates of Florida Inc.

**8.8. Project Information - Name and location of the project\*** Pass  Fail

City of Deerfield Beach citywide

**8.9. Project Information - Nature of the firm's responsibility on the project and work for which staff was responsible for\***

CDBG, NSP, HOME administration and dirct services

 Pass  Fail**8.10. Project Information - Project Duration\*** Pass  Fail

2011 - 2016

**8.11. Project Information - Completion (Anticipated) Date\*** Pass  Fail

2016

**8.12. Project Information - Size of Project\*** Pass  Fail

In excess of \$5,500,000.

**8.13. Project Information - Cost of Project\*** Pass  Fail

\$785,470.00

**9. REFERENCE # 4****9.1. Reference Contact Information - Name of Firm, City, County or Agency** Pass  Fail

City of Coral Springs FL

**9.2. Reference Contact Information - Reference's Business Address** Pass  Fail

9551 West Sample Rd. Coral Springs FL 33065

**9.3. Reference Contact Information - Reference's Contact Name & Title** Pass  Fail

Tina Jou Director Community Development (previously Susan Hess)

**9.4. Reference Contact Information - Reference's E-mail Address** Pass  Fail

Zoning@coralsprings.gov

**9.5. Reference Contact Information - Reference's Phone Number** Pass  Fail

954-344-1040

**9.6. Project Information - Was your firm the prime contractor for the listed project?** Pass  Fail

Yes

**9.7. Project Information - Name of Contactor Performing the Work** Pass  Fail

Community Redevelopment Associates of Florida Inc.

**9.8. Project Information - Name and location of the project** Pass  Fail

Coral Springs FL

**9.9. Project Information - Nature of the firm's responsibility on the project and work for which staff was responsible for**

CDBG and NSP administration

 Pass  Fail**9.10. Project Information - Project Duration** Pass  Fail

2008 - 2014

**9.11. Project Information - Completion (Anticipated) Date** Pass  Fail

2014

**9.12. Project Information - Size of Project** Pass  Fail

Approximately \$10,500,000

**9.13. Project Information - Cost of Project** Pass  Fail

\$406,564

**10. REFERENCE # 5****10.1. Reference Contact Information - Name of Firm, City, County or Agency** Pass  Fail

Cooper City FL

**10.2. Reference Contact Information - Reference's Business Address** Pass  Fail

9090 SW 50 PL Cooper City FL 33328

**10.3. Reference Contact Information - Reference's Contact Name & Title** Pass  Fail

Carlos Vega Director Community Development

**10.4. Reference Contact Information - Reference's E-mail Address** Pass  Fail

CVega@coopercity.gov

**10.5. Reference Contact Information - Reference's Phone Number** Pass  Fail

954-434-4300 x294

**10.6. Project Information - Was your firm the prime contractor for the listed project?** Pass  Fail

Yes

**10.7. Project Information - Name of Contactor Performing the Work** Pass  Fail

Community Redevelopment Associates of Florida Inc.

**10.8. Project Information - Name and location of the project** Pass  Fail

Cooper City FL

**10.9. Project Information - Nature of the firm's responsibility on the project and work for which staff was responsible for**

Implement grants awarded to city by Broward County

 Pass  Fail**10.10. Project Information - Project Duration** Pass  Fail

2001 - 2015

**10.11. Project Information - Completion (Anticipated) Date** Pass  Fail

2015

**10.12. Project Information - Size of Project** Pass  Fail


Approximately \$1,000,000


**10.13. Project Information - Cost of Project** Pass  Fail

\$193,033

**11. PROJECT DOCUMENTS****11.1. PROPOSERS BACKGROUND INFORMATION FORM\*** Pass  Fail

1. Please download the attached document, complete all required fields, and upload the completed form here.

 [Proposers\\_Background\\_Information\\_Form.xlsx](#)

 [Proposers\\_Background\\_Information\\_Form\\_Completed.pdf](#)


## 12. SWORN STATEMENT ON PUBLIC ENTITY CRIMES UNDER FLORIDA STATUTES CHAPTER 287.133(3)


(a)

### 12.1. SWORN STATEMENT ON PUBLIC ENTITY CRIMES FORM\*

Pass  Fail

1. Please download the attached document, complete all required fields, and upload the completed form here.

 [Sworn\\_Statement\\_on\\_Public\\_Entity\\_Crimes.pdf](#)

 [Sworn\\_Statement\\_on\\_Public\\_Entity\\_Crimes\\_signed.pdf](#)

### 12.2. Public Entity Crimes Status\*

Pass  Fail

- Which option did you select on the Sworn Statement on Public Entity Crimes Form:
  - A) Neither the entity submitting this sworn statement, nor any officers, directors, executives, partners, shareholders, employees, members, or agents who are active in management of the entity, nor any affiliate of the entity have been charged with and convicted of a public entity crime subsequent to July 1, 1989.
  - B1) The entity submitting this sworn statement, or one or more of the officers, directors, executives, partners, shareholders, employees, members, or agents who are active in management of the entity, or an affiliate of the entity has been charged with and convicted of a public entity crime subsequent to July 1, 1989, AND There has been a proceeding concerning the conviction before a hearing officer of the State of Florida, Division of Administrative Hearings. The final order entered by the hearing officer did not place the person or affiliate on the convicted vendor list. (Please attach a copy of the final order.)
  - B2) The entity submitting this sworn statement, or one or more of the officers, directors, executives, partners, shareholders, employees, members, or agents who are active in management of the entity, or an affiliate of the entity has been charged with and convicted of a public entity crime subsequent to July 1, 1989, AND The person or affiliate was placed on the convicted vendor list. There has been a subsequent proceeding before a hearing officer of the State of Florida, Division of Administrative Hearings. The final order entered by the hearing officer determined that it was in the public interest to remove the person or affiliate from the convicted vendor list. (Please attach a copy of the final order.)
  - B3) The entity submitting this sworn statement, or one or more of the officers, directors, executives, partners, shareholders, employees, members, or agents who are active in management of the entity, or an affiliate of the entity has been charged with and convicted of a public entity crime subsequent to July 1, 1989, AND The person or affiliate has not been placed on the convicted vendor list. (Please describe any action taken by or pending with the Department of General Services.)

A) No convictions.

### 12.3. Did you select option B1 or B2 above?\*

Pass  Fail

No

12.4. Did you select option B3 above?\*

Pass  Fail


No

### 13. EQUAL BENEFITS CERTIFICATION FOR DOMESTIC PARTNERS AND ALL MARRIED COUPLES

13.1. EQUAL BENEFITS CERTIFICATION FORM\*

Pass  Fail

1. Please download the attached document, complete all required fields, and upload the completed form here.

 [Equal\\_Benefits\\_Certification\\_Form.pdf](#)

 [Equal\\_Benefits\\_Certification\\_Form\\_signed.pdf](#)

13.2. Equal Benefits Status\*

Pass  Fail

- Which option did you select on the Equal Benefits Certification Form:
  - A. Contractor currently complies with the requirements of this section; or
  - B. Contractor will comply with the conditions of this section at the time of contract award; or
  - C. Contractor will not comply with the conditions of this section at the time of contract award; or
  - D. Contractor does not comply with the conditions of this section because of the following allowable exemption (Check only one box below):
    - 1. The Contractor does not provide benefits to employees' spouses in traditional marriages;
    - 2. The Contractor provides an employee the cash equivalent of benefits because the Contractor is unable to provide benefits to employees' Domestic Partners or spouses despite making reasonable efforts to provide them. To meet this exception, the Contractor shall provide a notarized affidavit that it has made reasonable efforts to provide such benefits. The affidavit shall state the efforts taken to provide such benefits and the amount of the cash equivalent. Cash equivalent means the amount of money paid to an employee with a Domestic Partner or spouse rather than providing benefits to the employee's Domestic Partner or spouse. The cash equivalent is equal to the employer's direct expense of providing benefits to an employee's spouse;
    - 3. The Contractor is a religious organization, association, society, or any non-profit charitable or educational institution or organization operated supervised or controlled by or in conjunction with a religious organization, association, or society;
    - 4. The Contractor is a governmental agency;

A) Contractor currently complies.

13.3. Did you select option D2 above?\*

Pass  Fail

No


### 14. DRUG-FREE WORKPLACE CERTIFICATION

14.1. VENDOR DRUG FREE WORKPLACE CERTIFICATION\*

Pass  Fail

1. Please download the attached document, complete all required fields, and upload the completed form here.

 [Vendor\\_Drug-Free\\_Workplace\\_Certification\\_Form.pdf](#)

 [Vendor\\_Drug-Free\\_Workplace\\_Certification\\_Form\\_signed.pdf](#)

#### 14.2. Drug-Free Status\*

Pass  Fail

Complies fully.


### 15. STANDARD DOCUMENTS

The following documents are standard documents that the City generally requires for every solicitation. As a result, we recommend vendors to keep these documents updated and readily available so that they can be easily uploaded for each project that the vendor would like to participate in. In the event that the City does not have one of the forms or documents listed below for your company, the City may reach out to your company after the bid has closed to obtain the document(s).

#### 15.1. NON-COLLUSIVE AFFIDAVIT\*

Pass  Fail

1. Please download the attached document, complete all required fields, and upload the completed form here.

 [Non-Collusive\\_Affidavit.pdf](#)


 [Non-Collusive\\_Affidavit\\_signed.pdf](#)

#### 15.2. SCRUTINIZED COMPANY CERTIFICATION\*

Pass  Fail

1. Please download the attached document, complete all required fields, and upload the completed form here.

 [Scrutinized\\_Company\\_Certification.pdf](#)

 [Scrutinized\\_Company\\_Certification\\_signed.pdf](#)

#### 15.3. E-VERIFY SYSTEM CERTIFICATION\*

Pass  Fail

1. Please download the attached document, complete all required fields, and upload the completed form here.
2. Effective January 1, 2021, pursuant to Section 448.095, Florida Statutes, the City may not enter into a contract with a vendor/contractor/subcontractor unless that vendor/contractor/subcontractor is registered with and uses the E-Verify system administered by the U.S. Department of Homeland Security ("DHS").
3. Contractor shall also require all subcontractors to provide an affidavit attesting that the subcontractor does not employ, contract with, or subcontract with, an unauthorized alien. The Contractor shall maintain a copy of such affidavit for the duration of the contract.

 [E-Verify\\_System\\_Certification\\_Statement.pdf](#)


 [E-Verify\\_System\\_Certification\\_Statement\\_signed.pdf](#)

#### 15.4. HUMAN TRAFFICKING AFFIDAVIT\*

Pass  Fail

1. Please download the attached document, complete all required fields, and upload the completed form here.

 [Human Trafficking Affidavit.pdf](#)

 [Human\\_Trafficking\\_Affidavit\\_signed.pdf](#)

## 16. VENDOR REGISTRATION

### 16.1. Do you currently have a City of Pembroke Pines Vendor Number registered in the PaymentWorks System?\*

- The City of Pembroke Pines utilizes OpenGov as its e-Procurement platform for  Pass  Fail solicitation and bid submission purposes. However, please be advised that **vendor registration for onboarding and processing payments is handled separately** through the City's Accounts Payable Division using **PaymentWorks**, a secure online vendor management platform.
- All vendors that will be submitting invoices and requiring payments from the City are required to register on the PaymentWorks platform. If the vendor is not currently registered with the City via PaymentWorks and does not have a Vendor Number, the City will have to invite the vendor to register.
- For formal solicitations such as this project, the Procurement Department will send PaymentWorks registration invitations to vendor(s) who are under active consideration for award. Please be aware that not all vendors who submit proposals will receive an invitation, in order to manage system usage and avoid onboarding vendors who are unlikely to receive payments from the City.
- Invitations will typically be sent to the contact listed on the submitted Vendor Information Form.

Yes

#### 16.1.1. What is your Vendor Number?\*

Pass  Fail

#3646 Our UEI is NS4LC83T6EA5, CAGE #52GQ5 Please see uploaded documents "SAM and FSD documents including EAAL Letter" related to registration issues.

### 16.2. VENDOR INFORMATION FORM\*

Pass  Fail

1. Please download the attached document, complete all required fields, and upload the completed form here.

 [Vendor Information Form.pdf](#)

 [Vendor\\_Information\\_Form\\_completed.pdf](#)

### 16.3. FORM W-9 (REVISED MARCH 2024)\*

Pass  Fail

1. Please download the attached document, complete all required fields, and upload the completed form here.
2. Note - Please use the March 2024 version of the form as previously dated versions of this form may delay the processing of any payments to the selected vendor.

 [Form\\_W-9\\_\(Rev\\_March\\_2024\).pdf](#)


 [Form\\_W-9\\_\(Rev\\_March\\_2024\)\\_signed.pdf](#)

## 17. OPTIONAL DOCUMENTATION

### 17.1. TRADE SECRETS

Pass  Fail

1. The Proposer's response to this solicitation is a public record pursuant to Florida law, which is subject to disclosure by the City under the State of Florida Public Records Law, Florida Statutes Chapter 119.07 ("Public Records Law"). The City shall permit public access to all documents, papers, letters or other material submitted in connection with this solicitation and the Contract to be executed for this solicitation, subject to the provisions of Chapter 119.07 of the Florida Statutes.
2. Any language contained in the Proposer's response to the solicitation purporting to require confidentiality of any portion of the Proposer's response to the solicitation, except to the extent that certain information is in the City's opinion a Trade Secret pursuant to Florida law, shall be void. If a Proposer submits any documents or other information to the City which the Proposer claims is Trade Secret information and exempt from Florida Statutes Chapter 119.07 ("Public Records Laws"), the Proposer shall clearly designate that it is a Trade Secret and that it is asserting that the document or information is exempt. The Proposer must specifically identify the exemption being claimed under Florida Statutes 119.07. The City shall be the final arbiter of whether any information contained in the Proposer's response to the solicitation constitutes a Trade Secret.
3. EXCEPT FOR CLEARLY MARKED PORTIONS THAT ARE BONA FIDE TRADE SECRETS PURSUANT TO FLORIDA LAW, DO NOT MARK YOUR RESPONSE TO THE SOLICITATION AS PROPRIETARY OR CONFIDENTIAL. DO NOT MARK YOUR RESPONSE TO THE SOLICITATION OR ANY PART THEREOF AS COPYRIGHTED. ALL DOCUMENTS THAT THE FIRM PURPORTS TO BE CONFIDENTIAL, PROPRIETARY OR A TRADE SECRET SHALL BE UPLOADED TO THE OPENGOV WEBSITE AS A SEPARATE ATTACHMENT, IN THIS SECTION, CLEARLY IDENTIFYING THE EXEMPTION BEING CLAIMED UNDER FLORIDA STATUTES 119.07.
4. The city's determination of whether an exemption applies shall be final, and the proposer agrees to defend, indemnify, and hold harmless the city and the city's officers, employees, and agent, against any loss or damages incurred by any person or entity as a result of the city's treatment of records as public records.

 [Understood\\_and\\_Confirmed.pdf](#)

### 17.2. FINANCIAL STATEMENTS

Pass  Fail

1. The City is **NOT** requesting the vendor to submit any financial statements for this project and prefers if the vendor does not submit financial statements. In addition, if the City needs a copy of the vendor's financial statements, the City can contact the vendor after the bid due date to request those documents. However, if the vendor does submit the financial statements, they should be uploaded in this section.
2. Any claim of confidentiality on financial statements must be asserted at the time of submittal. The firm must identify the specific statute that authorizes the exemption from the Public Records Law. Please note that the financial statement exemption provided for in Section 119.071(1)c, Florida Statutes only applies to submittals in response to a solicitation for a "public works" project.


 [Understood\\_and\\_Confirmed.pdf](#)

### 17.3. ALTERNATIVES

Pass  Fail

1. If you are submitting an alternative product, please upload any related information in this section (such as specification sheets, etc.).

2. In addition, pursuant to the “**Brand Names**” Section included in the GENERAL TERMS AND CONDITIONS Section if and wherever in the specifications a brand name, make, name of manufacturer, trade name, or vendor catalog number is mentioned, it is for the purpose of establishing a grade or quality of material only. Since the City does not wish to rule out other competition and equal brands or makes, the phrase “OR EQUAL” is added. However, if a product other than that specified is bid, Proposers shall indicate on their proposal and clearly state the proposed substitution and deviation. It is the vendor’s responsibility to provide any necessary documentation and samples within their bid submittal to prove that the product is equal to that specified. Such samples are to be furnished before the date of bid opening, unless otherwise specified. Additional evidence in the form of documentation and samples may be requested if the proposed brand is other than that specified. The City retains the right to determine if the proposed brand shall be considered as an approved equivalent or not.

 [Understood\\_and\\_Confirmed.pdf](#)

#### 17.4. ADDITIONAL INFORMATION


Pass  Fail

1. Please provide any additional information that you deem necessary to complete your proposal in this section, if it has not been requested in another section.


 [Code\\_of\\_Ethics-Confliedt\\_of\\_Interest\\_Polcy\\_as\\_required\\_by\\_HUD.pdf](#)

 [Letter\\_of\\_Interest\\_-\\_Executive\\_Summary.pdf](#)

 [Staff\\_Qualifications,\\_Experience\\_and\\_Training.pdf](#)

 [Firm\\_History,\\_Experience\\_and\\_Management\\_Approach.pdf](#)

 [SHIP\\_and\\_CDBG\\_Expenditures\\_Homeowners\\_Assisted.pdf](#)

 [Example\\_Pines\\_Planning\\_Calendar\\_2024\\_-\\_2025\\_.pdf](#)



[Community\\_Redevelopment\\_Assoc\\_Environmental\\_Review\\_Policies\\_Procedures\\_and\\_Training\\_Manual\\_v1.3.pdf](#)

 [Previous\\_and\\_Current\\_Client\\_List.pdf](#)

 [Fee\\_Schedule.pdf](#)

 [SAM\\_and\\_FSD\\_documents\\_including\\_EAAL\\_letter.pdf](#)

#### 17.5. PROFESSIONAL LICENSES

Pass  Fail

1. If applicable, please upload any professional licenses that may be required to perform the services outlined in the solicitation.

 [Professional\\_Licenses\\_Corporate\\_Documents.pdf](#)

#### 18. VENDOR CLASSIFICATION

##### 18.1. Is your firm a Veteran Owned Small Business (VOSB)?\*

Pass  Fail

1. The evaluation of competitive bids is subject to section 35.37 of the City’s Procurement Procedures which, except where contrary to federal and state law, or any other funding source requirements, provides that preference be given to veteran owned small businesses. To satisfy this requirement, the vendor shall affirm in writing its compliance with the following objective criteria as of the bid or proposal submission date stated in the solicitation.

2. A preference of two and a half percent (2.5%) of the total evaluation point, or two and a half percent (2.5%) of the total price, shall be given to the Veteran Owned Small Business (VOSB).

No

**18.2. Is your firm a Minority-Owned Business Enterprise (MBE)?\***  Pass  Fail

No

**18.3. Is your firm a Woman-Owned Business Enterprise (WBE)?\***  Pass  Fail

No

**18.4. Is your firm a HubZone Business / Labor Surplus Area Firm?\***  Pass  Fail

No

**18.5. Is your firm a Broward County Small Business Enterprise (SBE)?\***  Pass  Fail

No

**18.6. Is your firm a Broward County Business Enterprise (CBE)?\***  Pass  Fail

No

**18.7. Is your firm a Broward County Disadvantaged Business Enterprise (DBE)?\***  Pass  Fail

No

**18.8. Does your firm have a Vendor Classification that was not listed above?\***  Pass  Fail

No

**19. FEDERAL DOCUMENTS**

**19.1. Certification Regarding Lobbying; Debarment, Suspension and Other Responsibility Matters for Expenditure of Federal Funds\***


**1. Lobbying:**  Pass  Fail


1. As required by 7 CFR Part 3018, for persons entering into a contract, grant or cooperative agreement over **\$100,000** involving the expenditure of Federal funds, the Contractor must complete the **Certification Regarding Lobbying**.
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress or an employee of a Member of Congress, in connection with this Federal contract, grant, loan, or cooperative agreement, the Contractor shall also complete and submit the **Standard Form - LLL, "Disclosure Form to Report Lobbying,"** in accordance with its instructions.

**2. Debarment, Suspension and Other Responsibility Matters:**

1. Where the Contractor is unable to certify to any of the statements in the certification for **Debarment, Suspension and Other Responsibility Matters**, he or she shall **provide an explanation**.

- Please download the below documents, complete, and upload.

 [Federal Certification for Lobbying and Debarment and Form LLL.pdf](#)

 [Federal\\_Certification\\_for\\_Lobbying\\_and\\_Debarment\\_and\\_Form\\_LLL\\_signed.pdf](#)

**19.2. Are you currently registered as an active entity on SAM.gov (System for Award Management)?\***

1. All vendors submitting bids for this project must be registered and active in the  Pass  Fail System for Award Management (SAM.gov) at the time of bid award. This is a federal requirement for entities receiving federal funds, including contracts, grants, or other financial assistance. Registration on SAM.gov ensures that vendors are eligible to do business with the U.S. government and are not suspended, debarred, or otherwise excluded from participation in federal programs. SAM registration is free and can be completed at <https://sam.gov>. Bidders must provide their Unique Entity ID (UEI) and proof of active registration as part of their proposal.

No


**19.3. Debarment Status - Is your entity currently debarred, suspended, or otherwise excluded from receiving federal contracts or financial assistance?\***

No  Pass  Fail

**19.4. Form 1 of HUD Section 3 Implementation Plan\***

Pass  Fail

1. This project is governed by Section 3 of the Housing and Urban Development Act of 1968, as amended. Section 3 ensures that employment and economic opportunities created by HUD assistance benefit low- and very low-income individuals, especially those residing within the project's service area.
2. NO VALUEs must demonstrate their compliance with Section 3 requirements, please see "**HUD Section 3 Implementation Plan and Forms 1-6**" in the attachments section for additional information.
3. This may include providing information on how they will hire qualified low- and very low-income individuals and/or utilize Section 3 businesses as part of the project.
4. As part of the bidding process, NO VALUE must return **Form 1** with their bid submission, as failure to do so may result in the disqualification of your submittal.
5. In addition, Forms 2-6 must be submitted with final reporting, 30 days after project completion, as applicable.
6. Please download the below documents, complete, and upload.

 [Form\\_1\\_of\\_HUD\\_Section\\_3\\_Implementation\\_Plan.pdf](#)

 [293f1a81-b556-444f-97aa-98d7b7959ec9\\_Form\\_1\\_of\\_HUD\\_Section\\_3\\_Implementation\\_Plan\\_signed.pdf](#)

**19.5. I certify that the information provided above is true and correct to the best of my knowledge. I understand that false or misleading statements may disqualify this bid and subject the entity to federal penalties.\***

Confirmed

Pass  Fail

