

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

Project Names: **2022 Roseburg Regional Housing Rehabilitation Program**

Address: **Multiple Addresses within Douglas County.**

Activity / Project

Description: This project will provide home repair grants to low to moderate income homeowners to carry out minor rehabilitation projects on existing owner-occupied homes. Homeowners will be eligible for grants of up to \$15,000. Approximately 32 low-moderate income homeowners in the Cities of Roseburg and Myrtle Creek, and the surrounding areas of Douglas County will be served by the project. Umpqua Community Development Corporation dba NeighborWorks Umpqua (NWU) is the non-profit program administrator under contract to the City of Roseburg. Eligible home rehabilitation activities include health and safety activities (including lead-based paint abatement and/or removal, septic tanks, private sewer lines and drainfields, private water lines and wells, and asbestos tests, inspections and assessments, as well as architectural barrier removal or improvements necessary to fulfill reasonable accommodation requests and improve accessibility), construction, rehabilitation, reconstruction, or the installation of improvements to upgrade substandard electrical, plumbing, roofing, siding, insulation, or heating and domestic hot water systems, carry weatherization activities, and perform dry rot repairs. The Home Repair Policies and Procedures of the non-profit program administrator more fully detail the eligible activities, and limit the program to minor rehabilitation on owner-occupied homes. This project has been determined to be Categorically Excluded activity subject to Section 58.5 of 24 CFR Part 58. A tiered Environmental Review process has been used to conduct a targeted area assessment for the area of consideration, as defined in the CDBG grant application, as the geographic areas within Douglas County (map attached). This tiered review considered the Statutes, Executive Orders, and regulations at 24 CFR Part 58, and has determined certain authorities can be excluded from further site specific review, and are noted on the Statutory checklist. Those authorities that cannot be excluded from the target area assessment will be covered during a site specific environmental review that will be conducted prior to any CDBG funding being obligated to a specific site. Site specific authorities are noted on the checklist. The site specific reviews will be conducted by NWU as part of their program delivery.

Estimated activity cost: **\$500,000**

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

Tiered Environmental Review Format

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

Instructions:

Tier 1 – Complete the Environmental Exemption

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

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

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

Tier 3 – Site-Specific Assessment

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

Determination of Categorical Exclusion (subject to Section 58.5)

Determination of activities per 24 CFR 58.35(a)

Project Name(s) and Grant

2022 Roseburg Regional Housing Rehabilitation Program

Number(s): Activity / Project

Description: This project will provide home repair grants to low to moderate income homeowners to carry out minor rehabilitation projects on existing owner-occupied homes. Homeowners will be eligible for grants of up to \$15,000. Approximately 32 low-moderate income homeowners in the cities of Roseburg, Myrtle Creek, and the surrounding areas of Douglas County will be served by the project. Umpqua Community Development Corporation dba NeighborWorks Umpqua (NWU) is the non-profit program administrator under contract to the City of Roseburg. Eligible home rehabilitation activities include health and safety activities (including lead-based paint abatement and/or removal, septic tanks, private sewer lines and drainfields, private water lines and wells, and asbestos tests, inspections and assessments, as well as architectural barrier removal or improvements necessary to fulfill reasonable accommodation requests and improve accessibility), construction, rehabilitation, reconstruction, or the installation of improvements to upgrade substandard electrical, plumbing, roofing, siding, insulation, or heating and domestic hot water systems, carry weatherization activities, and perform dry rot repairs. The Home Repair Policies and Procedures of the non-profit program administrator more fully detail the eligible activities, and limit the program to minor rehabilitation on owner-occupied homes. This project has been determined to be Categorically Excluded activity subject to Section 58.5 of 24 CFR Part 58. A tiered Environmental Review process has been used to conduct a targeted area assessment for the area of consideration, as defined in the CDBG grant application, as the geographic areas within Douglas County (map attached). This tiered review considered the Statutes, Executive Orders, and regulations at 24 CFR Part 58, and has determined certain authorities can be excluded from further site specific review, and are noted on the Statutory checklist. Those authorities that cannot be excluded from the target area assessment will be covered during a site specific environmental review that will be conducted prior to any CDBG funding being obligated to a specific site. Site specific authorities are noted on the checklist. The site specific reviews will be conducted by NWU as part of their program delivery.

Estimated activity cost: \$500,000

Funding ☒ CDBG ☐ HOME ☐ Public Housing ☐ EDI ☐ ICDBG
☐ NAHASDA ☐ Other: _____

☒ The project falls into the category below, which is listed at 24 CFR 58.35(a) as a Categorically Excluded activity subject to Section 58.5.

☐ Acquisition, repair, improvement, reconstruction, or rehabilitation of public facilities and improvements (other than buildings) when the facilities and improvements are already in place and will be retained in the same use without change in size or capacity for more than 20 percent. Examples:

- Replacement of water or sewer lines
- Reconstruction of curbs and sidewalks
- Repaving of streets

☐ Special projects directed toward the removal of material and architectural barriers that restrict the mobility of and accessibility to the elderly and handicapped persons.

☒ Rehabilitation of buildings and improvements under the following conditions:

- In the case of a single-family owner-occupied residence, the density is not increased beyond the single unit, the land use is not changed, and the footprint of the building is not increased in a floodplain or in a wetland.

☐ An individual action:

- Up to four dwelling units where there is a maximum of four units on any one site. The units can be four one-unit buildings or one four-unit building or any combination in between; or
- A project of five or more housing units developed on scattered sites when the sites are more than 2,000 feet apart and there are not more than four housing units on any one site.

☐ Acquisition (including leasing) or disposition of an existing structure or acquisition (including leasing) of vacant land provided that the structure or land acquired or disposed of will be retained for the same use.

☐ Combinations of the above activities

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

The determination of the category listed above is supported by the following information: The program provides home repair grants to homeowners to carry out minor repairs on existing single family homes owned by low or moderate income homeowners. NeighborWorks Umpqua Home Repair Policy and Procedure Manual CDBG Addendum outlines the rules and regulations regarding CDBG activities. The Manual also states that NeighborWorks Umpqua Home Repair Program is for single family, owner occupied housing for low income individuals. The Home Repair Policy and Procedure Manual is attached.

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

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

This project is for scatter sites within the Cities of Roseburg, Myrtle Creek and all of Douglas Counties. All three communities participate in NFIP as per the attached list provided by the Federal Emergency Management Agency Community Status Book Report for Oregon.

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

Section 3. Coastal Barrier Resources Act

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

TIER 1 – OVERALL PROGRAM REVIEW
Target Area Assessment

Program name and description:

2022 Roseburg Regional Housing Rehabilitation Program

Activity / Project Description:

The Project will provide home repair grants to low to moderate income homeowners to carry out minor rehabilitation projects on existing owner-occupied homes. Homeowners will be eligible for grants of up to \$15,000. Approximately 32 low-moderate income homeowners in the Cities of Roseburg and Myrtle Creek, and the surrounding areas of Douglas County will be served by the project. Umpqua Community Development Corporation dba NeighborWorks Umpqua (NWU) is the non-profit program administer under contract to the City of Roseburg.

Eligible home rehabilitation activities include health and safety activities (including lead-based paint abatement and/or removal, septic tanks, private sewer lines and drainfields, private water lines and wells, and asbestos tests, inspections and assessments, as well as architectural barrier removal or improvements necessary to fulfill reasonable accommodation requests and improve accessibility), construction, rehabilitation, reconstruction, or the installation of improvements to upgrade substandard electrical, plumbing, roofing, siding, insulation, or heating and domestic hot water systems, carry weatherization activities, and perform dry rot repairs. The Home Repair Policies and Procedures of the non-profit program administrator more fully detail the eligible activities, and limit the program to minor rehabilitation on owner-occupied homes. This project has been determined to be Categorically Excluded activity subject to Section 58.5 of 24 CFR Part 58. A tiered Environmental Review process has been used to conduct a targeted area assessment for the area of consideration, as defined in the CDBG grant application, as the geographic areas within Douglas County (map attached). This tiered review considered the Statutes, Executive Orders, and regulations at 24 CFR Part 58, and has determined certain authorities can be excluded from further site specific review, and are noted on the Statutory checklist. Those authorities that cannot be excluded from the target area assessment will be covered during a site specific environmental review that will be conducted prior to any CDBG funding being obligated to a specific site. Site specific authorities are noted on the checklist. The site specific reviews will be conducted by NWU as part of their program delivery.

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

Applications will be accepted within the Cities / Counties of **Roseburg, Myrtle Creek, and Douglas County** boundaries (see attached map).

STATUTORY WORKSHEET

Use this worksheet only as part of a Tiered Review

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

HUD Environmental Standards	Status A/B	Determination and Compliance Documentation
Historic Preservation [36 CFR Part 800]	<input checked="" type="checkbox"/> B	Individual homes may be located within local historic preservation districts or be historically significant and subject to local review. Request for Comments / Concurrence was sent to the State Historic Preservation Office on 03/18/2022. No response was received from SHPO within the 30-day comment period. however, SHPO will be consulted on all projects that involve homes built previous to 1977. Requests for Comments / Concurrence were also sent on 3/18/2022 to the following THPOs, The Confederated Tribes of Siletz Indians of Oregon, Warm Springs Reservation of Oregon, Grand Ronde Community of Oregon, Coquille Indian Tribe, Coos, Lower Umpqua and Siuslaw Indians of Oregon, Cow Creek band of Umpqua Tribes, and Klamath Tribes per the listings contained in the HUD Tribal Data Assessment Tool (TDAT). Klamath responded on the 6th of April that they prefer to defer to local tribes. No other responses were received within the 30-day comment period. However, based on previous consultations with THPOs on Regional Housing Rehabilitation Program projects, individual homes assisted by this project will be assessed on a site specific level when the scope of work includes ground disturbance, and THPOs will be consulted. An Inadvertent Discovery Plan will be maintained and in effect for all projects where the scope includes ground disturbance
Floodplain Management [24 CFR 55, Executive Order 11988]	<input checked="" type="checkbox"/> A <input type="checkbox"/> B	<p>No rehabilitation work will be performed on homes located within a floodway. See Attachment 3 of the Policies and Procedures. The grant administrator will verify floodway status by reviewing the FEMA Flood Map for each home and filing this map in each project file.</p> <p>The project does not permit substantial / major rehabilitation exceeding 50% of the market value of the home and is restricted to the minor rehabilitation of single family owner occupied homes without changes, expansions or alternations to the footprint of the home. Program is determined to be exempt from floodplain requirements.</p>
Wetland Protection [Executive Order 11990]	<input checked="" type="checkbox"/> A <input type="checkbox"/> B	<p>Home Repair policy states that if a home is in a flood zone that Flood Insurance is necessary and will be a part of the Site Specific Review for each project that is in a flood zone. See Attachment 3 of the Policies and Procedures.</p> <p>The policies and procedures do not allow new construction, alternation, or expansion of the footprint of any existing structure located in a Wetland. See Attachment 3 of the Policies and Procedures as such is determined exempt from this requirement. Each project will be checked against the NWI (National Wetlands Inventory) with a site specific environmental review to ensure compliance with this rule. We will not allow impacts to wetlands. See Attachment 3 of the Policies and Procedures.</p>
Coastal Zone Management Act [Sections 307(c), (d)]	<input checked="" type="checkbox"/> A <input type="checkbox"/> B	The project does not permit substantial / major rehabilitation exceeding 50% of the market value of the home and is restricted to the minor rehabilitation of single family owner occupied homes without changes, expansions or alternations to the footprint of the home. Program is determined to be exempt from Coastal Zone Management Act requirements. See Attachment 3 of the Policies and Procedures.

HUD Environmental Standards	Status A/B	Determination and Compliance Documentation
<p><i>Sole Source Aquifers</i> [40 CFR 149]</p>	<p><input checked="" type="checkbox"/> A <input type="checkbox"/> B</p>	<p>The Designated Area contains no Sole Source Aquifers; therefore, the project is determined to be in compliance with this authority. See attached checklist and print of map from EPA's Sole Source Aquifers for Drinking Water Interactive map found at</p> <p>https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=9ebb047ba3ec41ada1877155fe31356b</p>
<p><i>Endangered Species Act</i> [50 CFR 402]</p>	<p><input checked="" type="checkbox"/> A <input type="checkbox"/> B</p>	<p>Douglas County is considered a critical habitat covered by NOAA and USFWS, for a few endangered or threatened species, and the area to be served by the project overlaps this covered habitat. However, the written program Policies and Procedures only allow minor housing rehabilitation and do not allow CDBG funds to be used for new construction, conversion of land use, major rehabilitation or the acquisition of undeveloped land, landscaping or hazardous tree removal and none of the assisted properties will be located in a riparian zone. No exterior repairs or improvements will increase post construction runoff nor will the amount of impervious surfaces be increased. All waste materials generated from project activities will be disposed of in an EPA approved sanitary or hazardous waste disposal site. See Attachment 3 of the Policies and Procedures.</p> <p>Based on this, it is determined that a No Effect on an ESA-listed species or designated critical habitat has been achieved.</p> <p>The determination checklist is included in the ERR file.</p>

HUD Environmental Standards	Status A/B	Determination and Compliance Documentation
<i>Wild and Scenic Rivers Act</i> [Sections 7(b), and (c)]	<input checked="" type="checkbox"/> A <input type="checkbox"/> B	<p>The Cow Creek, Smith River, Umpqua and South Umpqua Rivers, and Wessen Creek are listed on the National Rivers Inventory (NRI), however this project only allows minor rehabilitation, and the HR Policies and Procedures do not permit conversion of land use, major rehabilitation or acquisition of undeveloped land, landscaping or hazardous tree removal within riparian zones. Based on this the policies, the program is found to be compliance with this authority. See Attachment 3 of the Policies and Procedures.</p>
<i>Clean Air Act</i> [Sections 176(c), (d), and 40 CFR 6, 51, 93]	<input checked="" type="checkbox"/> A <input type="checkbox"/> B	<p>There are no non-attainment areas that overlap the project area. Further the housing rehabilitation program policies and procedures prohibit new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units. See Air Quality Worksheet and Attachment 3 of the Policies and Procedures.</p>
<i>Farmland Protection Policy Act</i> [7 CFR 658]	<input checked="" type="checkbox"/> A <input type="checkbox"/> B	<p>Conversion of farmland to non-agricultural uses is not an eligible activity for assistance under this project. Further, the project is limited to minor rehabilitation of existing single-family owner-occupied homes. Project is found to be in compliance with this authority. See Project Description and Attachment 3 of the Policies and Procedures.</p>
<i>Environmental Justice</i> [Executive Order 12898]	<input checked="" type="checkbox"/> A <input type="checkbox"/> B	<p>Project is limited to minor rehabilitation of existing single family owner occupied homes. The housing rehabilitation program policies and procedures identify that acquisition of existing housing, acquisition of land for development and new construction are not eligible for assistance under the program. The program is limited to LMI participants who reside in the assisted units therefore there will only be a positive impact to minority or low and moderate income persons. See Attachment 3 of the Policies and Procedures and the Environmental Justice Statement executed by the RE's Certifying Officer.</p>

HUD Environmental Standards	Status A/B	Determination and Compliance Documentation
Noise Abatement and Control [24 CFR 51B]	<input checked="" type="checkbox"/> B	Specific housing units to be assisted are not yet identified; therefore, no determination can be made at this time. Compliance with this requirement will be determined during the site specific review.
Explosive and Flammable Operations [24 CFR 51C]	<input checked="" type="checkbox"/> A <input type="checkbox"/> B	Project is limited to minor rehabilitation of existing single family owner occupied homes. Housing rehabilitation of owner occupied single family residential units is not considered to increase residential densities, convert a building for habitation, or make a vacant building habitable. Therefore, compliance is met for this authority. See Project Description and Attachment 3 of the Policies and Procedures.
Toxic Chemicals and Radioactive Materials [HUD Notice 79-33]	<input checked="" type="checkbox"/> B	Specific housing units to be assisted are not yet identified, therefore, no determination can be made at this time. Compliance with this requirement will be determined during the site specific review.
Airport Clear Zones and Accident Potential Zones [24 CFR 51D]	<input checked="" type="checkbox"/> A <input type="checkbox"/> B	The project does not permit substantial / major rehabilitation exceeding 50% of the market value of the home and is restricted to the minor rehabilitation of single family owner occupied homes without changes, expansions or alternations to the footprint of the home. Program is determined to be exempt from ACZ and APZ requirements. See Attachment 3 of the Policies and Procedures.
Flood Disaster Protection Act	<input checked="" type="checkbox"/> B	Specific housing units to be assisted are not yet identified, therefore, no determination can be made at this time. Compliance with this requirement will be determined during the site specific review. See Attachment 3 of the Policies and Procedures for flood insurance requirements.

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

Responsible Entity's Certifying Officer	
Certifying Officer Name and Title	
Date	

TIER 3 – SITE-SPECIFIC REVIEW PROCESS AND FORM
Policies and Procedures for Site-Specific Environmental Reviews

_____ has made the following decisions pertaining to future site- specific environmental review projects:

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

HISTORIC PROPERTIES

Projects will be evaluated on a case-by-case basis. For all projects older than 45 years, the City / County will consult with SHPO to determine if the unit is national register eligible or on the national register.

_____ will consider SHPO comments and comply with part 36 CFR Part 800 prior to approving any loan or grant under this program.

NOISE

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

TOXIC CHEMICALS AND RADIOACTIVE MATERIALS

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

FLOOD DISASTER PROTECTION ACT

Projects will be evaluated on a case-by-case basis. It must be determined whether a project is in a 100- year floodplain and source documentation identified by FEMA map panel number and date must be in the file. If a project is located in a 100-year floodplain, evidence must be provided that the homeowner has flood insurance. The City will not provide substantial improvement to homes located in the 100 year flood zone.

Project cannot proceed prior to _____

notification that environmental review is complete (ROF issued by OBBD-IFA and the site-specific review has been signed by the Responsible Entity's Certifying Officer).

Building Address: _____

Market Value of House: _____

Estimated Cost of Rehabilitation: _____

Rehabilitation will expand footprint of house: ☐ Yes ☐ No HISTORIC

PRESERVATION

1. The unit is less than 45 years old and does not include ground disturbance

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

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

☐ No: PROCEED to #2

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

☐ No Historic Properties Affected

☐ Provide letter documenting concurrence of determination from SHPO

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

☐ No Historic Properties Adversely Affected

☐ Provide letter documenting concurrence of determination from

☐ SHPO Provide conditions that will be placed on project

Condition(s):

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

☐ SHPO) Provide letter documenting concurrence of determination

☐ from SHPO Provide Memorandum of Agreement

Condition(s):

NOISE:

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

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

☐ Yes: PROCEED to #2

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

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

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

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

☐ No. Record your determination in the ERR

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

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

☐ Yes. Stop here.

☐ Provide documentation to evidence determination including inspection reports, pictures, and information from www.epa.gov or similar sites.

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

☐ Provide documentation to show mitigation will address adverse environmental

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

Condition(s):

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

FLOOD INSURANCE

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

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

☐ No. Provide FIRM map and FIRM map panel number: _____
Continue

Is the project located in a FEMA designated 100 year floodplain? Visit this site for FIRM Maps: www.fema.gov

☐ Yes. Project will have to maintain flood insurance on the
☐ property Provide FIRM map and FIRM map panel
number:

☐ Attach copy of flood insurance declaration or condition project

Determination:

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

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

Conditions:

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

Responsible Entity's Certifying Officer	
Certifying Officer Name and Title	
Date	

Historic Preservation (CEST and EA)

General requirements	Legislation	Regulation
Regulations under Section 106 of the National Historic Preservation Act (NHPA) require a consultative process to identify historic properties, assess project impacts on them, and avoid, minimize, or mitigate adverse effects	Section 106 of the National Historic Preservation Act (16 U.S.C. 470f)	36 CFR 800 "Protection of Historic Properties"
References		
https://www.hudexchange.info/environmental-review/historic-preservation		

Threshold

Is Section 106 review required for your project?

- ☐ No, because the project consists solely of activities listed as exempt in a Programmatic Agreement (PA). (See the [PA Database](#) to find applicable PAs.)

Either provide the PA itself or a link to it here. Mark the applicable exemptions or include the text here:

→ *Continue to the Worksheet Summary.*

- ☐ No, because the project consists solely of activities included in a No Potential to Cause Effects memo or other determination [36 CFR 800.3(a)(1)].

Either provide the memo itself or a link to it here. Explain and justify the other determination here:

→ *Continue to the Worksheet Summary.*

☒ Yes, because the project includes activities with potential to cause effects (direct or indirect). → *Continue to Step 1.*

The Section 106 Process

After determining the need to do a Section 106 review, initiate consultation with regulatory and other interested parties, identify and evaluate historic properties, assess effects of the project on properties listed on or eligible for the National Register of Historic Places, and resolve any adverse effects through project design modifications or mitigation.

Note that consultation continues through all phases of the review.

Step 1: Initiate consultation

Step 2: Identify and evaluate historic properties

Step 3: Assess effects of the project on historic properties

Step 4: Resolve any adverse effects

Step 1 - Initiate Consultation

The following parties are entitled to participate in Section 106 reviews: Advisory Council on Historic Preservation; State Historic Preservation Officers (SHPOs); federally recognized Indian tribes/Tribal Historic Preservation Officers (THPOs); Native Hawaiian Organizations (NHOs); local governments; and project grantees. The general public and individuals and organizations with a demonstrated interest in a project may participate as consulting parties at the discretion of the RE or HUD official. Participation varies with the nature and scope of a project. Refer to HUD's website for guidance on consultation, including the required timeframes for response. Consultation should begin early to enable full consideration of preservation options.

Use the [When To Consult With Tribes checklist](#) within [Notice CPD-12-006: Process for Tribal Consultation](#) to determine if you should invite tribes to consult on a particular project. Use the [Tribal Directory Assessment Tool \(TDAT\)](#) to identify tribes that may have an interest in the area where the project is located. Note that consultants may not initiate consultation with Tribes.

Select all consulting parties below (check all that apply):

☒ State Historic Preservation Officer (SHPO)

☐ Advisory Council on Historic Preservation

☒ Indian Tribes, including Tribal Historic Preservation Officers (THPOs) or Native

☐ Hawaiian Organizations (NHOs)

List all tribes that were consulted here and their status of consultation:

Requests for Comments/Concurrence were also sent on 3/18/2022 to the following THPOs, The Confederated Tribes of Siletz Indians of Oregon, Warm Springs Reservation of Oregon, Grand Ronde Community of Oregon, Coquille Indian Tribe, Coos, Lower Umpqua and Siuslaw Indians of Oregon, Cow Creek band of Umpqua Tribes, and Klamath Tribes per the listings contained in the HUD Tribal Data Assessment Tool (TDAT). Klamath responded on the 6th of April that they prefer to defer to local tribes. No other responses were received within the 30-day comment period.

☐ Other Consulting Parties

List all consulting parties that were consulted here and their status of consultation:

Describe the process of selecting consulting parties and initiating consultation here:

The Tribal Directory Assessment Tool was consulted, and letters were prepared and sent by the city of Roseburg to the consulting agencies via the mail with Domestic Return Receipts attached to show receipt of the letters.

Provide all correspondence, notices, and notes (including comments and objections received) and continue to Step 2.

Step 2 - Identify and Evaluate Historic Properties

Define the Area of Potential Effect (APE), either by entering the address(es) or providing a map depicting the APE. Attach an additional page if necessary.

Maps are provided below to show the areas for the scattered sites that will receive assistance in this program. No specific sites have been identified at this time, and a site-specific review will be completed for each project in the overall area identified in the maps.

Gather information about known historic properties in the APE. Historic buildings, districts and archeological sites may have been identified in local, state, and national surveys and registers, local historic districts, municipal plans, town and county histories, and local history websites. If not already listed on the National Register of Historic Places, identified properties are then evaluated to see if they are eligible for the National Register.

Refer to HUD's website for guidance on identifying and evaluating historic properties.

In the space below, list historic properties identified and evaluated in the APE.

Every historic property that may be affected by the project should be listed. For each historic property or district, include the National Register status, whether the SHPO has concurred with the finding, and whether information on the site is sensitive. Attach an additional page if necessary.

Maps are provided below to show the areas for the scattered sites that will receive assistance in this program. No specific sites have been identified at this time, and a site-specific review will be completed for each project in the overall area identified in the maps.

Provide the documentation (survey forms, Register nominations, concurrence(s) and/or objection(s), notes, and photos) that justify your National Register Status determination.

Was a survey of historic buildings and/or archeological sites done as part of the project?

If the APE contains previously unsurveyed buildings or structures over 50 years old, or there is a likely presence of previously unsurveyed archeological sites, a survey may be necessary. For Archeological surveys, refer to HP Fact Sheet #6, [Guidance on Archeological Investigations in HUD Projects](#).

☐ Yes → *Provide survey(s) and report(s) and continue to Step 3.*

Additional notes:

☒ No → *Continue to Step 3.*

Step 3 - Assess Effects of the Project on Historic Properties

Only properties that are listed on or eligible for the National Register of Historic Places receive further consideration under Section 106. Assess the effect(s) of the project by applying the Criteria of Adverse Effect. ([36 CFR 800.5](#)) Consider direct and indirect effects as applicable as per HUD guidance.

Choose one of the findings below - No Historic Properties Affected, No Adverse Effect, or Adverse Effect; and seek concurrence from consulting parties.

☒ **No Historic Properties Affected**

Document reason for finding:

☐ No historic properties present. → *Provide concurrence(s) or objection(s) and continue to the Worksheet Summary.*

☒ Historic properties present, but project will have no effect upon them. → *Provide concurrence(s) or objection(s) and continue to the Worksheet Summary.*

If consulting parties concur or fail to respond to user's request for concurrence, project is in compliance with this section. No further review is required. If consulting parties object, refer to ([36 CFR 800.4\(d\)\(1\)](#)) and consult further to try to resolve objection(s).

☒ No Adverse Effect

Document reason for finding:

No specific sites have been identified at this time, and a site-specific review will be completed for each project.

Does the No Adverse Effect finding contain conditions?

☐ Yes

Check all that apply: (check all that apply)

- ☐ Avoidance
- ☐ Modification of project
- ☐ Other

Describe conditions here:

→ *Monitor satisfactory implementation of conditions. Provide concurrence(s) or objection(s) and continue to the Worksheet Summary.*

☐ No → *Provide concurrence(s) or objection(s) and continue to the Worksheet Summary.*

If consulting parties concur or fail to respond to user's request for concurrence, project is in compliance with this section. No further review is required. If consulting parties object, refer to ([36 CFR 800.5\(c\)\(2\)](#)) and consult further to try to resolve objection(s).

☐ Adverse Effect

Document reason for finding:

Copy and paste applicable Criteria into text box with summary and justification.

Criteria of Adverse Effect: [36 CFR 800.5](#)

Notify the Advisory Council on Historic Preservation of the Adverse Effect and provide the documentation outlined in [36 CFR 800.11\(e\)](#). The Council has 15 days to decide whether to enter the consultation (Not required for projects covered by a Programmatic Agreement).

→ *Continue to Step 4.*

Step 4 - Resolve Adverse Effects

Work with consulting parties to try to avoid, minimize or mitigate adverse effects. Refer to HUD guidance and [36 CFR 800.6 and 800.7](#).

Were the Adverse Effects resolved?

☐ Yes

Describe the resolution of Adverse Effects, including consultation efforts and participation by the Advisory Council on Historic Preservation:

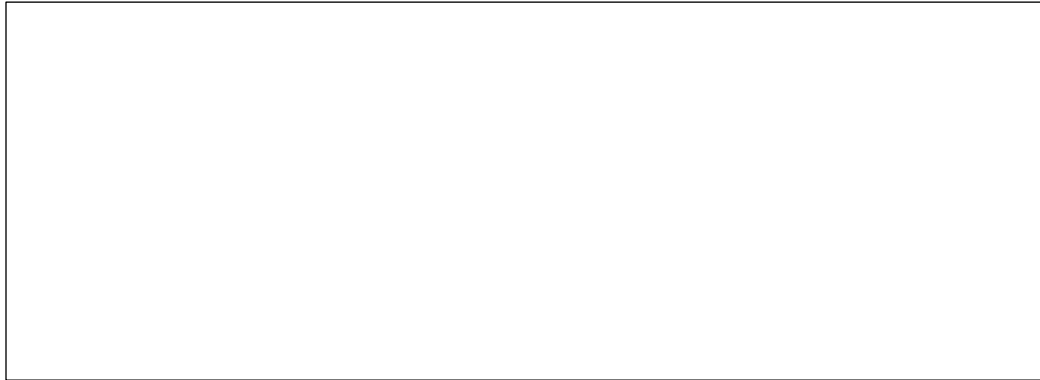
For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.

→ *Provide signed Memorandum of Agreement (MOA) or Standard Mitigation Measures Agreement (SMMA). Continue to the Worksheet Summary.*

☐ No

The project must be cancelled unless the “Head of Agency” approves it. Either provide approval from the “Head of Agency” or cancel the project at this location.

Describe the failure to resolve Adverse Effects, including consultation efforts and participation by the Advisory Council on Historic Preservation and “Head of the Agency”:



Explain in detail the exact conditions or measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.



→ *Provide correspondence, comments, documentation of decision, and “Head of Agency” approval. Continue to the Worksheet Summary.*

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

Individual homes may be located within local historic preservation districts or be historically significant and subject to local review. Request for Comments / Concurrence was sent to the State Historic Preservation Office on 03/18/2022. No response was received from SHPO within the 30-day comment period. however, SHPO will be consulted on all projects that involve homes built previous to 1977. Requests for Comments /Concurrence were also sent on 3/18/2022 to the following THPOs, The Confederated Tribes of Siletz Indians of Oregon, Warm Springs Reservation of Oregon, Grand Ronde Community of Oregon, Coquille Indian Tribe, Coos, Lower Umpqua and Siuslaw Indians of Oregon, Cow Creek band of Umpqua Tribes, and Klamath Tribes per the listings contained in the HUD Tribal Data Assessment Tool (TDAT). Klamath responded on the 6th of April that they prefer to defer to local tribes. No other responses were received within the 30-day comment period. However, based on previous consultations with THPOs on Regional Housing Rehabilitation Program projects, individual homes assisted by this project will be assessed on a site-specific level when the scope of work includes ground disturbance, and THPOs will be consulted. An Inadvertent Discovery Plan will be maintained and in effect for all projects where the scope includes ground disturbance.

Are formal compliance steps or mitigation required?


☐ Yes

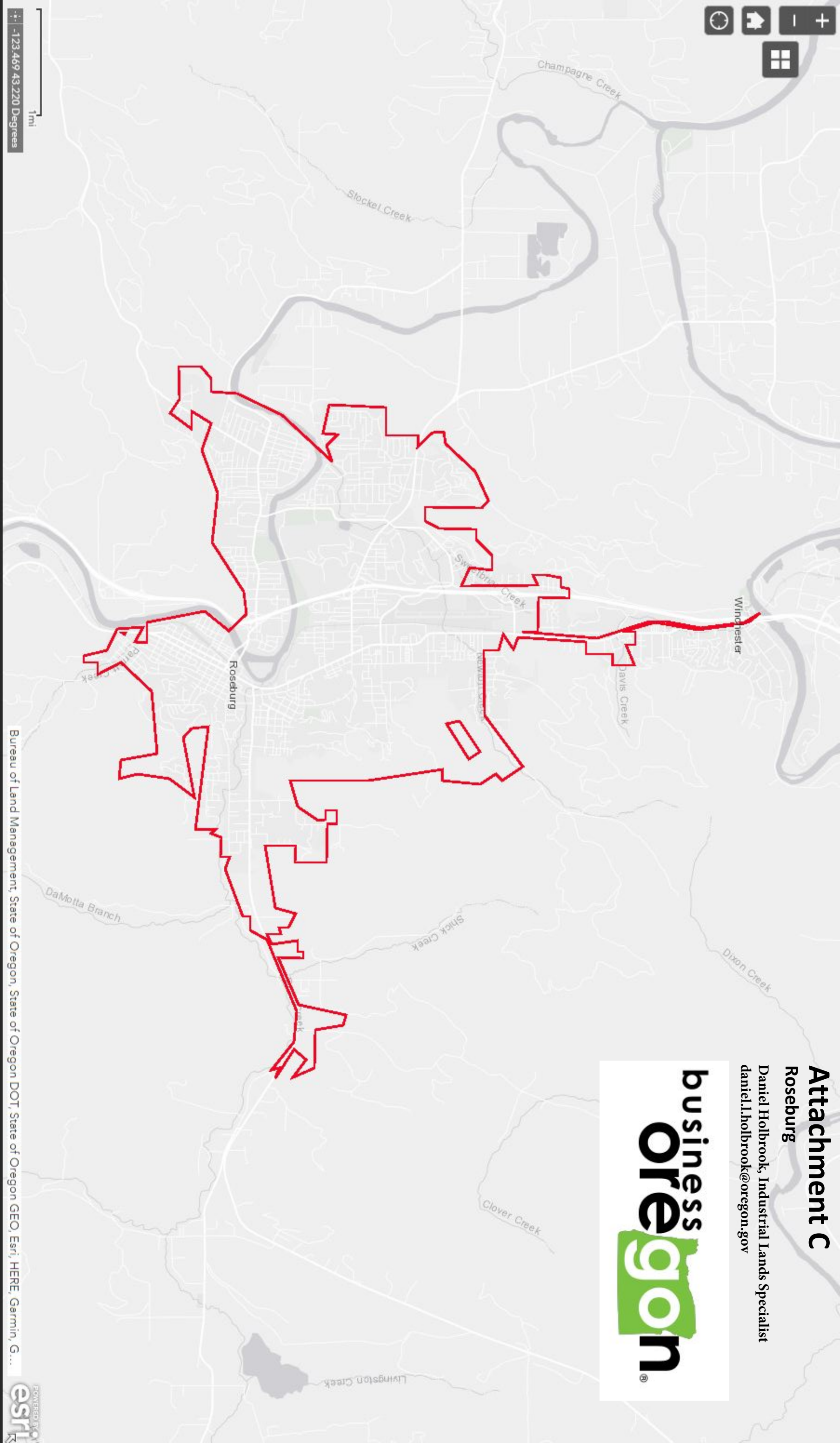
☒ No



Attachment C

Roseburg
Daniel Holbrook, Industrial Lands Specialist
daniel.l.holbrook@oregon.gov

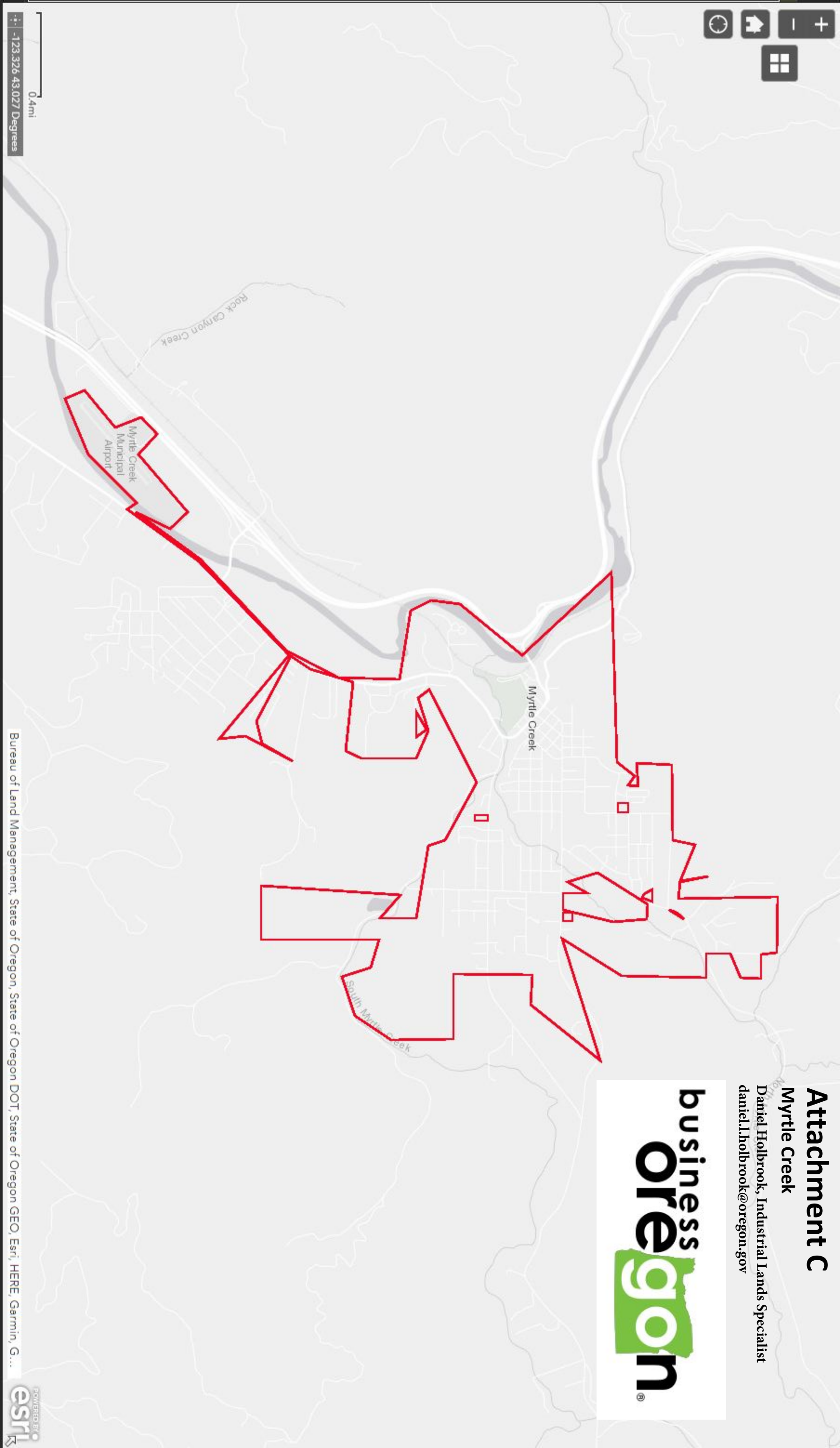




Attachment C

Myrtle Creek

Daniel Holbrook, Industrial Lands Specialist
daniel.l.holbrook@oregon.gov

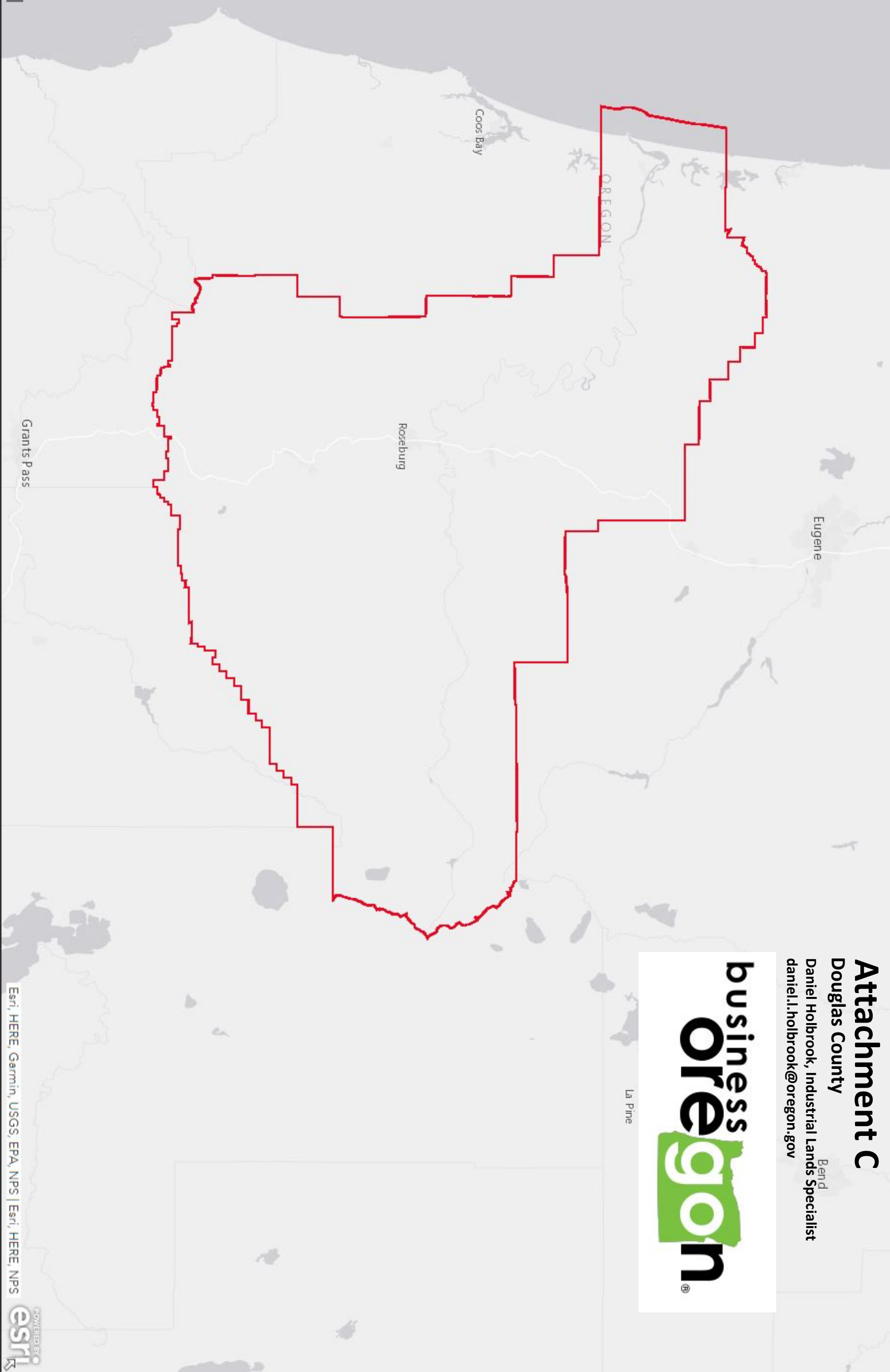


-123.326 43.027 Degrees
0.4mi





10mi
-125.002 43.365 Degrees



Attachment C

Douglas County

^{Bend}
Daniel Holbrook, Industrial Lands Specialist
daniel.l.holbrook@oregon.gov





Tribal Directory Assessment Information



Contact Information for Tribes with Interests in Douglas County, Oregon

	Tribal Name	County Name
+	Confederated Tribes of Siletz Indians of Oregon	Douglas
+	Confederated Tribes of the Coos, Lower Umpqua and Siuslaw Indians	Douglas
+	Confederated Tribes of the Grand Ronde Community of Oregon	Douglas
+	Confederated Tribes of the Warm Springs Reservation of Oregon	Douglas
+	Coquille Indian Tribe	Douglas
+	Cow Creek Band of Umpqua Tribe of Indians	Douglas
+	Klamath Tribes	Douglas

1 - 7 of 7 results

« < 1 > » 10 ▼

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

ROBERT BRUNOE, TRIBAL HISTORIC PRESERVATION OFFICER
CONFEDERATED TRIBES OF THE WARM SPRINGS RESERVATION
OF OREGON
PO BOX C, WARM SPRINGS OR 97761



9590 9402 4793 8344 2156 22

2. Article Number (Transfer from service label)

7018 2290 0000 2809 6262

PS Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

[Signature] ☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☐ No

MAR 21 2022

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☒ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over \$500)

- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

PERRY CHOCKTOOT, THPO
KLAMATH TRIBES
PO BOX 436
CHILOQUIN, OR 97624-0436



9590 9402 4793 8344 2156 53

2. Article Number (Transfer from service label)

7018 2290 0000 2809 6231

PS Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

[Signature] ☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☒ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over \$500)

- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

STACY SCOTT, THPO
CONFEDERATED TRIBES OF THE COOS, LOWER UMPQUA
AND SIUSLAW INDIANS
1245 FULTON AVENUE, COOS BAY OR 97420



9590 9402 4793 8344 2156 46

2. Article Number (Transfer from service label)

7018 2290 0000 2809 6248

PS Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

[Signature] ☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☒ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over \$500)

- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

OR SHPO REVIEW & COMPLIANCE
725 SUMMER ST NE STE C
SALEM, OR 97301-1266



9590 9402 4793 8344 2156 15

2. Article Number (Transfer from service label)

30 0000 5841 4134

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X SRT

☐ Agent☐ Addressee

B. Received by (Printed Name)

101 CIA

C. Date of Delivery

3-21-22

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☒ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over \$500)

- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

DAVID FARRELSON
PROGRAM MANAGER AND THPO
CONFEDERATED TRIBES OF THE GRANDE COMMUNITY OF OREGON
8720 GRAND RONDE RD. GRAND RONDE. OR 97347-2016



9590 9402 4793 8344 2156 39

2. Article Number (Transfer from service label)

7018 2290 0000 2809 6255

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X [Signature]

☐ Agent☐ Addressee

B. Received by (Printed Name)

C-19

C. Date of Delivery

3/21/22

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

mail Room

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☒ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over \$500)

- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

KASSANDRA RIPPEE, TRIBAL HISTORIC PRESERVATION
COQUILLE INDIAN TRIBE
3050 TREMONT STREET, NORTH BEND OR 97459



9590 9402 4793 8344 2156 08

2. Article Number (Transfer from service label)

7018 3090 0000 5841 4141

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X [Signature]

☒ Agent☐ Addressee

B. Received by (Printed Name)

C-19

C. Date of Delivery

3-21-22

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☒ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over \$500)

- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

DELORES PIGSLEY TRIBAL CHIEF
 CONFEDERATED TRIBES OF SILETZ INDIANS OF OREGON
 PO BOX 549, SILETZ, OR 97380-0549



9590 9402 4793 8344 2155 85

2. Article Number (Transfer from service label)

7018 3090 0000 5841 4189

PS Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

- ☐ Agent
- ☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

Nolan Hare

3-21-22

D. Is delivery address different from item 1? ☐ Yes
 If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☒ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over \$500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt

Robert Whitsell

From: John K. Lazur <JLazur@cityofroseburg.org>
Sent: Thursday, April 14, 2022 1:53 PM
To: Robert Whitsell
Subject: RE: Any new THPO Responses?

Yes

From: Robert Whitsell <rwhitsell@nwumpqua.org>
Sent: Thursday, April 14, 2022 1:16 PM
To: John K. Lazur <JLazur@cityofroseburg.org>
Subject: RE: Any new THPO Responses?

Is that for Cow Creek's THPO Request?

Robert Whitsell | Single Family Home Repair Manager
AgeSafe Senior Home Safety Specialist | Asbestos Inspector
NeighborWorks Umpqua - NMLS# 255912
PH: (541) 600-3227 | F: (541) 673-5023 | rwhitsell@nwumpqua.org | nwumpqua.org
Office: 1984 Sherman Ave, North Bend, OR 97459
Equal Housing Opportunity | Equal Housing Lender

From: John K. Lazur <JLazur@cityofroseburg.org>
Sent: Thursday, April 14, 2022 10:37 AM
To: Robert Whitsell <rwhitsell@nwumpqua.org>
Subject: RE: Any new THPO Responses?

This is all I have...

Tracking Number: 70183090000058414158

Status

Your item was delivered to an individual at the address at 10:42 am on March 21, 2022 in ROSEBURG, OR 97470.

 **Delivered, Left**

March 21, 2022 at 10:42 am
ROSEBURG, OR 97470

USPS Tracking Plus® Available 

From: Robert Whitsell <rwhitsell@nwumpqua.org>

Sent: Wednesday, April 13, 2022 4:16 PM

To: John K. Lazur <JLazur@cityofroseburg.org>

Subject: Any new THPO Responses?

Hello John,

Have we received any more responses from THPO/SHPO? Did Cow Creek finally receive theirs? Any news from the Post Office on why the delay?

Respectfully,

Robert Whitsell | Single Family Home Repair Manager
AgeSafe Senior Home Safety Specialist | Asbestos Inspector

NeighborWorks Umpqua - NMLS# 255912

PH: (541) 600-3227 | F: (541) 673-5023 | rwhitsell@nwumpqua.org | nwumpqua.org

Office: 1984 Sherman Ave, North Bend, OR 97459

Equal Housing Opportunity | Equal Housing Lender

Robert Whitsell | Rehabilitation Specialist

NeighborWorks Umpqua

541-600-3227 | nwumpqua.org

1984 Sherman Ave, North Bend, OR 97459

NMLS# 255912

Equal Housing Opportunity | Equal Housing Lender

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Robert Whitsell | Rehabilitation Specialist

NeighborWorks Umpqua

541-600-3227 | nwumpqua.org

1984 Sherman Ave, North Bend, OR 97459

NMLS# 255912

Equal Housing Opportunity | Equal Housing Lender

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Robert Whitsell

From: John K. Lazur <JLazur@cityofroseburg.org>
Sent: Wednesday, April 6, 2022 3:02 PM
To: Robert Whitsell
Subject: FW: Roseburg Regional Housing Rehabilitation

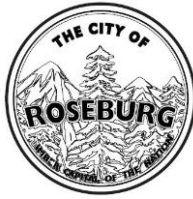
FYI

From: Clarence Henthorne <clarence.henthorne@klamathtribes.com>
Sent: Wednesday, April 6, 2022 2:43 PM
To: John K. Lazur <JLazur@cityofroseburg.org>
Cc: Jennifer Vigil <jennifer.vigil@klamathtribes.com>; Jennifer Ochoa <jennifer.ochoa@klamathtribes.com>; Mandy Roberson <mandy.roberson@klamathtribes.com>; Perry Chocktoot <perry.chocktoot@klamathtribes.com>
Subject: Roseburg Regional Housing Rehabilitation

Thank you for the opportunity to consult on this project but the area is outside of the Klamath Tribes aboriginal territories and as such we will defer to the appropriate tribes for consultation

Clarence Henthorne
The Klamath Tribes
Cultural Resource Protection Specialist
(541) 783-2764 X102

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**CITY OF ROSEBURG
INADVERTENT DISCOVERY PLAN SEPTEMBER 2017**

1. GENERAL

- A. The following Inadvertent Discovery Plan (IDP) is to be implemented by the City of Roseburg (City), and followed by any contractor or subcontractor working for or on behalf of the City, to expeditiously address inadvertent discoveries during ground disturbing activities for the City involving the City of Roseburg Head Start Project. This IDP terminates when the project reaches substantial completion.
- B. This IDP is to ensure all parties involved are contacted and fulfill their obligations under the following state and federal laws:
 - 1. Archaeological Objects and Sites [ORS 358.905-358.955]
 - 2. Indian Graves and Protected Objects [ORS 97-740-97.760]
 - 3. National Historic Preservation Act [16 USC 470] [36 CFR Part 60]
 - 4. Native American Graves Protection and Repatriation Act [25 USC 3001] [43 CFR Part 10]
- C. The laws recognize and codify the tribes' rights in the decision-making process regarding ancestral remains and associated objects. Therefore both the discovered ancestral remains and/or archaeological objects should be treated in a sensitive and respectful manner by all parties involved.
- D. In accordance with these laws, if previously unidentified archaeological materials or sites are discovered during ground disturbing activities, the following shall occur:
 - 1. The project in the immediate vicinity of the inadvertent discovery will stop.
 - 2. City staff shall be notified by telephone at (541) 492-6877 of the inadvertent discovery and the City staff shall, in turn, notify a professional archaeologist of the inadvertent discovery.
 - 3. A buffer zone of thirty (30) meters shall be established around the site, unless otherwise advised by the archaeologist; and the City shall take reasonable measures to protect the site.
 - 4. The City will notify the following of the inadvertent discovery by

telephone, facsimile, and/or email within 48 hours of the discovery, or at the soonest possible time: the State Historic Preservation Office (SHPO; telephone or facsimile only); the Confederated Tribes of the Grand Ronde Community (the Tribe); Cow Creek Band of Umpqua Indians (the Tribe).

5. If human remains are discovered, the City will cease all activity which will cause further disturbance to the remains. The City will notify the Oregon State Police, the SHPO, the Commission on Indian Services, the Tribe, and the Douglas County Sheriff to ensure that the human remains are cared for, that relevant parties agree upon a course of action, and that project activities can recommence while not causing unreasonable harm to the discovered burial area. (*See attached Inadvertent Discovery Checklist for specific names and numbers.*) The human remains and associated objects should not be disturbed, manipulated, or transported from the original location until a plan is developed with all consulting parties.
6. If ground disturbing activities are necessary to determine significance, site boundaries, and/or National Register eligibility, an expedited archaeological permit will be applied for by the consulting archaeologist and received from the SHPO prior to commencing with any ground disturbance.
7. Expedited review to prevent an undue threat to the site shall be undertaken in accordance with state law. The SHPO and the Tribe will attempt to respond within forty-eight (48) hours of notification (excluding Saturdays, Sundays, and any legal or tribal holidays). The City shall not proceed with any ground disturbing activities until concurrence is received from the SHPO, and any other consulting agencies identified as needing review by Oregon state law. The City will take into account recommendations for the discovered resources and carry out appropriate actions.
8. The consulting archaeologist shall make a preliminary assessment of National Register eligibility of the discovered resource(s) and propose actions to resolve any potential adverse effects at the soonest possible time. The findings will be sent to the State Historic Preservation Office whenever an archaeological site is found whether human remains are discovered or not. SHPO must concur on all eligibility decisions before project activities can commence.
9. All inadvertent discoveries must be documented, as appropriate, regarding state historic preservation laws. This may include archaeological site forms submitted to the SHPO, cultural resource evaluation reports, findings of effect, and testing and mitigation reports. All data recovery plans should be coordinated through the Oregon SHPO. If found eligible for the National Register, the site should be avoided, if possible. If not, it will need to be mitigated to minimize impacts.

10. Depending on the project, the nature of discovery and the statutory jurisdiction, the SHPO may ask the City to retain a consulting archaeologist to assist in the development of a Treatment Plan. The appropriate jurisdictional agency may need to get involved in discussions to resolve the matter in accordance with their respective authorities.
 11. The City may conclude this procedure and notify consulting parties, as appropriate, if the disturbance of the historic property or property of traditional religious and cultural importance is minimal so as to have no effect on the historic property and the excavation or disturbance can be relocated to avoid the property, as determined with the SHPO and the Tribe. Concurrence from the SHPO and the Tribe is required prior to commencement of any further ground disturbing activities.
 12. Documentation of all reports and associated compliance should be kept in the City project files.
- E. The intent of the IDP is to have a process in place to expeditiously deal with such discoveries. Management of archaeological sites should be conducted in a spirit of stewardship for future generations, with full recognition of their non-renewable nature and their potential multiple uses and public values.
- F. This Inadvertent Discovery Plan (IDP) is to be implemented by the City of Roseburg (City), and followed by any Contractor or subcontractor working for or on behalf of the City, to expeditiously address inadvertent discoveries during ground disturbing activities for the City involving the Roseburg Head Start Project.

**CITY OF ROSEBURG
INADVERTANT DISCOVERY CHECKLIST**

The following checklist assist in the documentation of any archaeological materials or sites unexpectedly discovered during ground disturbing activities:

Inadvertent Discovery Identified

CONTRACTOR

Representative's Name: _____ Date _____

ENGINEER

Representative's Name: _____ Date _____

CITY

Representative's Name: _____ Date _____

Notes:

Work Stopped

CONTRACTOR

Representative's Name: _____ Date _____

ENGINEER

Representative's Name: _____ Date _____

CITY

Representative's Name: _____ Date _____

Notes:

Harm Avoided or Minimized

CONTRACTOR

Representative's Name: _____ Date _____

ENGINEER

Representative's Name: _____ Date _____

CITY

Representative's Name: _____ Date _____

Notes:

Field Evaluation Conducted by Professional Archaeologist within 48 Hours, or as Soon as Possible:

Name: _____ Date: _____

Professional qualifications: _____

Methods of documentation:

Notes:

Notifications within 48 Hours of Discovery to: State Historic Preservation Office (SHPO)
RE: SHPO Case No. 17-1109

Contacts: Dennis Griffin, State Archaeologist, Office (503) 986-0674, Fax (503) 986-0793,
dennis.griffin@state.gov

John Pouley, Assistant State Archaeologist, (503) 986-0675, Fax (503) 986-0793, john.pouley@state.gov

Jason Allen, Historic Preservation Specialist, Office (503) 986-0579,
Fax (503) 986-0793, jason.allen@state.gov

Name: _____ Date: _____ Time: _____

Notified by: _____

Notes:

Federally Recognized Tribes

Cow Creek Band of Umpqua Tribe of Indians

Contact: Jessie Plueard, THPO & Cultural Resource Programs Manager, Office (541) 677-5575, Cell (541) 643-6980,
email: jplueard@cowcreek.com

Jeremy Johnson, Archeologist, Office (541) 677-5575, Cell (541) 900-0508
jjohnson@cowcreek.com

Name: _____ Date: _____ Time: _____

Notified by: _____

Notes:

Confederated Tribes of the Grand Ronde Community of Oregon

Contact: Christopher Bailey, Cultural Protection Specialist, Office (503) 879-1675,
thpo@grandronde.org

Name: _____ Date: _____ Time: _____

Notified by: _____

Notes:

Found Human Remains

____ Yes ____ No

Name: _____ Date: _____

Notes:

Notifications at Time of Discovery to: Oregon State Police

Contact: Sgt. Chris Allori, Oregon State Police, Office (503) 731-4717,
Cell (503) 708-646, callori@osp.state.or.us

Name: _____ Date: _____ Time: _____

Notified by: _____

Notes:

Oregon Commission on Indian Services, Salem, Oregon

Contact: Karen Quigley, Executive Director, Office (503) 986-1067, Fax (503) 986-1071, karen.m.quigley@state.or.us

Name: _____ Date: _____ Time: _____

Notified by: _____

Notes:

Douglas County Sheriff

Contact: Main Office (541) 440-4450, Dispatch (non-emergency) (541) 440-4471

Name: _____ Date: _____ Time: _____

Notified by: _____

Notes:

Made Determination of National Register Eligibility: ____ Yes ____ No
____ Eligible ____ Not eligible

Name: _____ Date: _____

Professional qualifications: _____

Notes:

SHPO Concurrence:

_____ Agrees _____ Disagrees

Name: _____ Date: _____

Notes:

Decided on Treatment:

Description:

Performed by: _____ Date: _____

Notes:

Documentation Filed:

Name: _____ Date: _____

Type of documentation: _____

Location of files:

Treatment of Native American Human Remains Discovered Inadvertently or Through Criminal Investigations on Private and Non-Federal Public Lands in Oregon

Native American burial sites are not simply artifacts of the tribe's cultural past, but are considered sacred and represent a continuing connection with their ancestors. Native American ancestral remains, funerary objects, sacred objects and objects of cultural patrimony associated with Oregon Tribes are protected under state law, including criminal penalties (ORS 97.740-.994 and 358.905-.961). The laws recognize and codify the Tribes' rights in the decision-making process regarding ancestral remains and associated objects. Therefore both the discovered ancestral remains and their associated objects should be treated in a sensitive and respectful manner by all parties involved.

Identification of Human Remains

- Oregon laws (ORS 146.090 & .095) outline the types of deaths that require investigation and the accompanying responsibilities for that investigation. The law enforcement official, district medical examiner, and the district attorney for the county where the death occurs are responsible for deaths requiring investigation. Deaths that require investigation include those *occurring under suspicious or unknown circumstances*.
- If human remains that are inadvertently discovered or discovered through criminal investigations are **not clearly modern**, then there is high probability that the remains are Native American and therefore ORS 97.745(4) applies, which requires immediate notification with State Police, State Historic Preservation Office, Commission on Indian Services, and all appropriate Native American Tribes. To determine who the "appropriate Native American Tribe" the responsible parties should contact the Legislative Commission on Indian Services (CIS). To determine whether the human remains are Native American the responsible parties should contact the appropriate Native American Tribes at the initial discovery. It should be noted that there may be more than one appropriate Native American Tribe to be contacted.
- If the human remains are possibly Native American then the area should be secured from further disturbance. The human remains and associated objects **should not be disturbed, manipulated, or transported from the original location until a plan is developed in consultation with the above named parties**. These actions will help ensure compliance with Oregon state law that prohibits any person willfully removing human remains and/or objects of cultural significance from its original location (ORS 97.745).
- All parties involved and the appropriate Native American Tribes shall implement a culturally sensitive plan for reburial.

Notification

- State law [ORS 97.745 (4)] requires that any discovered human remains suspected to be Native American shall be reported to-
 1. State Police (current contact Sgt. Chris Allori, Department of State Police, office phone 503-731-4717, cell 503-708-6461, or Dispatch 503-731-3030)
 2. State Historic Preservation Office (SHPO)

*Note: This document was created by the Government to Government Cultural Resource Cluster Group in September, 2006.

- Primary contact= Dennis Griffin, State Archaeologist, office phone 503-986-0674, cell phone 503-881-5038
 - Secondary contact= John Pouley, Asst. State Archaeologist, office phone 503-986-0675, cell phone 503-480-9164.
3. Commission on Indian Services (CIS)
- Current contact= Karen Quigley, Director, office phone 503-986-1067. Karen will provide the list of appropriate Native American Tribes.
4. All appropriate Native American Tribes provided by CIS.
- Burns Paiute Tribe- Diane Teeman 541-417-1986
 - Confederated Tribes of Coos, Lower Umpqua and Siuslaw- Stacy Scott 541-888-9577 X7513
 - Confederated Tribes of Grand Ronde- David Harrelson 503-879-1630
 - Confederated Tribes of Siletz- Robert Kentta 541-444-2532
 - Confederated Tribes of the Umatilla Indian Reservation- Tera Farrow 541-276-3629, secondary contact; Catherine Dickson 541-429-7231
 - Confederated Tribes of Warm Springs- Holly Shea 541-553-2422
 - Coquille Indian Tribe- Kassie Rippee 541-756-0904 X1216
 - Cow Creek Band of Umpqua Indians- Jessie Plueard 541-677-5575 X5577
 - Klamath Tribes- Perry Chocktoot 541-783-2219 X159

Floodplain Management (CEST and EA)

General Requirements	Legislation	Regulation
Executive Order 11988, Floodplain Management, requires Federal activities to avoid impacts to floodplains and to avoid direct and indirect support of floodplain development to the extent practicable.	Executive Order 11988	24 CFR 55
Reference		
https://www.hudexchange.info/environmental-review/floodplain-management		

1. Does [24 CFR 55.12\(c\)](#) exempt this project from compliance with HUD's floodplain management regulations in Part 55?

☒ Yes

Provide the applicable citation at 24 CFR 55.12(c) here. If the project is exempt under 55.12(c)(7) or (8), provide supporting documentation.

The project does not permit substantial / major rehabilitation exceeding 50% of the market value of the home and is restricted to the minor rehabilitation of single-family owner-occupied homes without changes, expansions, or alternations to the footprint of the home. Program is determined to be exempt from floodplain requirements. See Attachment 3 of the Policies and Procedures. Home Repair policy states that if a home is in a flood zone that Flood Insurance is necessary and will be a part of the Site Specific Review for each project that is in a flood zone. See Attachment 3 of the Policies and Procedures.

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.

☐ No → Continue to Question 2.

2. Provide a FEMA/FIRM or ABFE map showing the site.

The Federal Emergency Management Agency (FEMA) designates floodplains. The FEMA Map Service Center provides this information in the form of FEMA Flood Insurance Rate Maps (FIRMs) or Advisory Base Flood Elevations (ABFEs). For projects in areas not mapped by FEMA, use the best available information to determine floodplain information. Include documentation, including a discussion of why this is the best available information for the site.

Does your project occur in a floodplain?

☐ No → Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.

☐ Yes

Select the applicable floodplain using the FEMA map or the best available information:

- ☐ Floodway → *Continue to Question 3, Floodways*
- ☐ Coastal High Hazard Area (V Zone) → *Continue to Question 4, Coastal High Hazard Areas*
- ☐ 500-year floodplain (B Zone or shaded X Zone) → *Continue to Question 5, 500-year Floodplains*
- ☐ 100-year floodplain (A Zone) → *The 8-Step Process is required. Continue to Question 6, 8-Step Process*

3. Floodways

Is this a functionally dependent use?

- ☐ Yes

The 8-Step Process is required. Work with your HUD FEO to determine a way to satisfactorily continue with this project. Provide a completed 8-Step Process, including the early public notice and the final notice.

→ *Continue to Question 6, 8-Step Process*

- ☐ No

Federal assistance may not be used at this location *unless a 55.12(c) exception applies.*
You must either choose an alternate site or cancel the project at this location.

4. Coastal High Hazard Area

Is this a critical action?

- ☐ Yes

Critical actions are prohibited in coastal high hazard areas. Federal assistance may not be used at this location. Unless the action is excepted at 24 CFR 55.12(c), you must either choose an alternate site or cancel the project.

- ☐ No

Does this action include construction that is not a functionally dependent use, existing construction (including improvements), or reconstruction following destruction caused by a disaster?

- ☐ Yes, there is new construction.

New construction is prohibited in V Zones ((24 CFR 55.1(c)(3)).

- ☐ No, this action concerns only a functionally dependent use, existing construction(including improvements), or reconstruction following destruction caused by a disaster.

This construction must have met FEMA elevation and construction standards for a coastal high hazard area or other standards applicable at the time of construction.

→ *Continue to Question 6, 8-Step Process*

5. 500-year Floodplain

Is this a critical action?

☐ No → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.*

☐ Yes → *Continue to Question 6, 8-Step Process*

6. 8-Step Process.

Does the 8-Step Process apply? Select one of the following options:

☐ 8-Step Process applies.

Provide a completed 8-Step Process, including the early public notice and the final notice.

→ *Continue to Question 7, Mitigation*

☐ 5-Step Process is applicable per 55.12(a)(1-3).

Provide documentation of 5-Step Process.

Select the applicable citation:

☐ *55.12(a)(1)* HUD actions involving the disposition of HUD-acquired multifamily housing projects or “bulk sales” of HUD-acquired one- to four-family properties in communities that are in the Regular Program of the National Flood Insurance Program (NFIP) and in good standing (i.e., not suspended from program eligibility or placed on probation under 44 CFR 59.24).

☐ *55.12(a)(2)* HUD's actions under the National Housing Act (12 U.S.C. 1701) for the purchase or refinancing of existing multifamily housing projects, hospitals, nursing homes, assisted living facilities, board and care facilities, and intermediate care facilities, in communities that are in good standing under the NFIP.

☐ *55.12(a)(3)* HUD's or the recipient's actions under any HUD program involving the repair, rehabilitation, modernization, weatherization, or improvement of existing multifamily housing projects, hospitals, nursing homes, assisted living facilities, board and care facilities, intermediate care facilities, and one- to four-family properties, in communities that are in the Regular Program of the National Flood Insurance Program (NFIP) and are in good standing, provided that the number of units is not increased more than 20 percent, the action does not involve a conversion from nonresidential to residential land use, the action does not meet the thresholds for “substantial improvement” under § 55.2(b)(10), and the footprint of the structure and paved areas is not significantly increased.

- ☐ 55.12(a)(4) HUD's (or the recipient's) actions under any HUD program involving the repair, rehabilitation, modernization, weatherization, or improvement of existing nonresidential buildings and structures, in communities that are in the Regular Program of the NFIP and are in good standing, provided that the action does not meet the thresholds for "substantial improvement" under § 55.2(b)(10) and that the footprint of the structure and paved areas is not significantly increased.

→ *Continue to Question 7, Mitigation*

- ☐ 8-Step Process is inapplicable per 55.12(b)(1-4).

Select the applicable citation:

- ☐ 55.12(b)(1) HUD's mortgage insurance actions and other financial assistance for the purchasing, mortgaging or refinancing of existing one- to four-family properties in communities that are in the Regular Program of the National Flood Insurance Program (NFIP) and in good standing (i.e., not suspended from program eligibility or placed on probation under 44 CFR 59.24), where the action is not a critical action and the property is not located in a floodway or coastal high hazard area.
- ☐ 55.12(b)(2) Financial assistance for minor repairs or improvements on one- to four-family properties that do not meet the thresholds for "substantial improvement" under § 55.2(b)(10)
- ☐ 55.12(b)(3) HUD actions involving the disposition of individual HUD-acquired, one- to four-family properties.
- ☐ 55.12(b)(4) HUD guarantees under the Loan Guarantee Recovery Fund Program (24 CFR part 573) of loans that refinance existing loans and mortgages, where any new construction or rehabilitation financed by the existing loan or mortgage has been completed prior to the filing of an application under the program, and the refinancing will not allow further construction or rehabilitation, nor result in any physical impacts or changes except for routine maintenance.
- ☐ 55.12(b)(5) The approval of financial assistance to lease an existing structure located within the floodplain, but only if—
 - (i) The structure is located outside the floodway or Coastal High Hazard Area, and is in a community that is in the Regular Program of the NFIP and in good standing (i.e., not suspended from program eligibility or placed on probation under 44 CFR 59.24);
 - (ii) The project is not a critical action; and
 - (iii) The entire structure is or will be fully insured or insured to the maximum under the NFIP for at least the term of the lease.

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.*

7. Mitigation

For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.

Which of the following mitigation/minimization measures have been identified for this project in the 8-Step or 5-Step Process? Select all that apply.

- ☐ Permeable surfaces
- ☐ Natural landscape enhancements that maintain or restore natural hydrology
- ☐ Planting or restoring native plant species
- ☐ Bioswales
- ☐ Evapotranspiration
- ☐ Stormwater capture and reuse
- ☐ Green or vegetative roofs with drainage provisions
- ☐ Natural Resources Conservation Service conservation easements or similar easements
- ☐ Floodproofing of structures
- ☐ Elevating structures including freeboarding above the required base flood elevations
- ☐ Other

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.*

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

No rehabilitation work will be performed on homes located within a floodway. See Attachment 3 of the Policies and Procedures. The grant administrator will verify floodway status by reviewing the FEMA Flood Map for each home and filing this map in each project file.

The project does not permit substantial / major rehabilitation exceeding 50% of the market value of the home and is restricted to the minor rehabilitation of single-family owner-occupied homes without changes, expansions or alternations to the footprint of the home. Program is determined to be exempt from floodplain requirements. See Attachment 3 of the Policies and Procedures. Home Repair policy states that if a home is in a flood zone that Flood Insurance is necessary and will be a part of the Site Specific Review for each project that is in a flood zone. See Attachment 3 of the Policies and Procedures.

Are formal compliance steps or mitigation required?

☐ Yes

☒ No



Community Status Book Report

Communities Participating in the National Flood Program



OREGON

[Click here for not participating](#)

CID	Community Name	County	Init FHBM Identified	Init FIRM Identified	Curr Eff Map Date	Reg-Emer Date	Tribal	CRS Entry Date	Curr Eff Date	Curr Class	% Disc SFHA	% Disc Non SFHA
410205#	ADAMS, CITY OF	UMATILLA COUNTY	08/30/74	05/15/84	09/03/10	05/15/84	No					
410285#	ADRIAN, CITY OF	MALHEUR COUNTY	05/29/79	09/19/84	09/19/84	09/19/84	No					
410137B	ALBANY, CITY OF	BENTON COUNTY/LINN COUNTY	02/22/74	04/03/85	12/08/16	04/03/85	No	10/01/91	10/01/17	5	25%	10%
410250#	AMITY, CITY OF	YAMHILL COUNTY	07/30/76	12/01/81	03/02/10	12/01/81	No					
410071#	ARLINGTON, CITY OF	GILLIAM COUNTY	02/21/75	09/24/84	09/24/84(M)	09/24/84	No					
410090C	ASHLAND, CITY OF	JACKSON COUNTY	06/07/74	06/01/81	04/05/17	06/01/81	No	10/01/91	10/01/17	8	10%	05%
410028#	ASTORIA, CITY OF	CLATSOP COUNTY	06/28/74	08/01/78	09/17/10	08/01/78	No					
410206#	ATHENA, CITY OF	UMATILLA COUNTY	11/02/73	07/16/84	09/03/10	07/16/84	No					
410155#	AUMSVILLE, CITY OF	MARION COUNTY	05/10/74	03/01/79	01/19/00	03/01/79	No					
410156#	AURORA, CITY OF	MARION COUNTY	08/30/74	06/05/97	01/19/00	06/30/76	No					
410002#	BAKER CITY, CITY OF	BAKER COUNTY	02/01/74	04/17/84	06/03/88	04/17/84	No					
410001#	BAKER COUNTY*	BAKER COUNTY	02/28/78	02/28/78	06/03/88	06/03/88	No					
410043C	BANDON, CITY OF	COOS COUNTY	12/21/73	08/15/84	12/07/18	08/15/84	No	05/01/05	05/01/10	10		0%
410239B	BANKS, CITY OF	WASHINGTON COUNTY		11/04/16	11/04/16	05/25/17	No					
410013#	BARLOW, CITY OF	CLACKAMAS COUNTY	01/10/75	05/05/81	06/17/08	05/05/81	No					
410197A	BAY CITY, CITY OF	TILLAMOOK COUNTY	06/14/74	08/01/78	09/28/18	08/01/78	No					
410240B	BEAVERTON, CITY OF	WASHINGTON COUNTY	02/01/74	09/28/84	10/19/18	09/28/84	No	10/01/91	10/01/94	10		0%
410056#	BEND, CITY OF	DESCHUTES COUNTY	06/28/74	09/04/87	09/28/07	09/04/87	No					
410008B	BENTON COUNTY *	BENTON COUNTY	12/27/74	08/05/86	12/08/16	08/05/86	No	10/01/02	05/01/18	7	15%	05%
410174#	BOARDMAN, CITY OF	MORROW COUNTY	09/12/75	12/18/07	12/18/07(M)	05/25/78	No					
410110#	BONANZA, CITY OF	KLAMATH COUNTY	09/13/74	06/01/83	06/01/83(M)	06/01/83	No					
410053B	BROOKINGS, CITY OF	CURRY COUNTY	05/31/74	09/18/85	11/16/18	09/18/85	No					
410138#	BROWNSVILLE, CITY OF	LINN COUNTY	12/07/73	08/17/81	09/29/10	08/17/81	No					
410281#	BURNS PAIUTE RESERVATION	HARNEY COUNTY	07/18/78	09/28/84	09/28/84	09/28/84	Yes					
410084#	BURNS, CITY OF	HARNEY COUNTY	11/30/73	08/15/84	12/22/98	08/15/84	No					
410091	BUTTE FALLS, TOWN OF	JACKSON COUNTY	11/08/74	06/30/76	06/30/76(M)	06/30/76	No					
410014#	CANBY, CITY OF	CLACKAMAS COUNTY	11/16/73	06/15/84	06/17/08	06/15/84	No					
410029B	CANNON BEACH, CITY OF	CLATSOP COUNTY	06/21/74	09/01/78	06/20/18	09/01/78	No	10/01/94	05/01/19	10		0%
410075#	CANYON CITY, CITY OF	GRANT COUNTY	12/07/73	09/18/87	09/18/87	09/18/87	No					
410060#	CANYONVILLE, CITY OF	DOUGLAS COUNTY	06/07/74	11/01/78	02/17/10	11/01/78	No					
410251#	CARLTON, CITY OF	YAMHILL COUNTY	11/30/73	06/30/76	03/02/10	06/30/76	No					
410087#	CASCADE LOCKS, CITY OF	HOOD RIVER COUNTY	05/24/74	09/24/84	09/24/84(M)	09/24/84	No					
410107#	CAVE JUNCTION, CITY OF	JOSEPHINE COUNTY	11/08/74	06/01/82	12/03/09	06/10/80	No					
410092#	CENTRAL POINT, CITY OF	JACKSON COUNTY	06/21/74	09/30/80	05/03/11	09/30/80	No	10/01/92	05/01/12	6	20%	10%
410111#	CHILOQUIN, CITY OF	KLAMATH COUNTY	11/30/73	08/15/84	08/15/84	08/15/84	No					
415588B	CLACKAMAS COUNTY*	CLACKAMAS COUNTY		03/01/78	01/18/19	03/01/78	No	10/01/04	05/01/17	10		0%
410035#	CLATSKANIE, CITY OF	COLUMBIA COUNTY	12/07/73	09/29/86	11/26/10	09/29/86	No					
410027B	CLATSOP COUNTY*	CLATSOP COUNTY	12/20/74	07/03/78	06/20/18	07/03/78	No					
410119#	COBURG, CITY OF	LANE COUNTY	12/21/73	01/06/84	06/02/99(M)	01/06/84	No					
410034#	COLUMBIA COUNTY*	COLUMBIA COUNTY	01/17/75	08/16/88	11/26/10	08/16/88	No					
410036#	COLUMBIA, CITY OF	COLUMBIA COUNTY	12/21/73	06/05/85	11/26/10	06/05/85	No					
410072#	CONDON, CITY OF	GILLIAM COUNTY	05/24/74	09/24/84	09/24/84(M)	09/24/84	No					
410044C	COOS BAY, CITY OF	COOS COUNTY	08/23/74	08/01/84	12/07/18	08/01/84	No					
	INCLUDES THE CITY OF EASTSIDE											
410042C	COOS COUNTY *	COOS COUNTY	11/01/74	11/15/84	12/07/18	11/15/84	No					
410045C	COQUILLE, CITY OF	COOS COUNTY	11/03/73	09/28/84	12/07/18	09/28/84	No					
410261B	CORNELIUS, CITY OF	WASHINGTON COUNTY	11/05/76	01/06/82	11/04/16	01/06/82	No					
410009#	CORVALLIS, CITY OF	BENTON COUNTY	06/14/74	01/03/85	06/02/11	01/03/85	No	10/01/91	05/01/17	5	25%	10%
410120#	COTTAGE GROVE, CITY OF	LANE COUNTY	02/22/74	11/15/85	06/02/99	11/15/85	No	05/01/18	10/01/20	6	20%	10%
410121#	CRESWELL, CITY OF	LANE COUNTY	12/21/73	09/18/85	06/02/99	09/18/85	No					
410050#	CROOK COUNTY *	CROOK COUNTY	08/16/77	07/17/89	02/02/12	07/17/89	No					
410290#	CULVER, CITY OF	JEFFERSON COUNTY		09/04/87	09/04/87	02/18/88	No					
410052B	CURRY COUNTY *	CURRY COUNTY	09/13/74	04/03/78	11/16/18	04/03/78	No					
410187#	DALLAS, CITY OF	POLK COUNTY	11/23/73	04/05/88	12/19/06	04/05/88	No					
410006#	DAMASCUS, CITY OF	CLACKAMAS COUNTY		07/19/00	06/17/08	05/10/07	No					

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CID	Community Name	County	Init FHBM Identified	Init FIRM Identified	Curr Eff Map Date	Reg-Emer Date	Tribal	CRS Entry Date	Curr Eff Date	Curr Class	% Disc SFHA	% Disc Non SFHA
410252#	DAYTON, CITY OF	YAMHILL COUNTY	01/23/74	06/01/82	03/02/10	06/01/82	No					
410076#	DAYVILLE, CITY OF	GRANT COUNTY	01/24/75	09/24/84	09/24/84(M)	09/24/84	No					
410283B	DEPOE BAY, CITY OF	LINCOLN COUNTY	06/12/79	10/15/80	10/18/19	10/15/80	No					
410055#	DESCHUTES COUNTY *	DESCHUTES COUNTY	01/17/75	08/16/88	09/28/07	08/16/88	No					
410157#	DETROIT, CITY OF	MARION COUNTY	11/01/74	06/30/76	01/19/00	06/30/76	No					
410059B	DOUGLAS COUNTY *	DOUGLAS COUNTY		12/15/78	03/23/21	12/15/78	No	10/01/00	10/01/17	10		0%
410061#	DRAIN, CITY OF	DOUGLAS COUNTY	04/05/74	08/01/79	02/17/10	08/01/79	No					
410231#	DUFUR, CITY OF	WASCO COUNTY	06/07/74	09/24/84	09/24/84(M)	09/24/84	No					
410253#	DUNDEE, CITY OF	YAMHILL COUNTY	06/28/74	03/01/82	03/02/10	03/01/82	No					

410262B	DUNES CITY, CITY OF	LANE COUNTY	01/28/77	03/24/81	06/05/20(M)	03/24/81	No										
410263B	DURHAM, CITY OF	WASHINGTON COUNTY	11/12/76	01/06/82	11/04/16	01/06/82	No										
410093C	EAGLE POINT, CITY OF	JACKSON COUNTY	10/18/74	09/30/80	01/19/18	09/30/80	No										
410207#	ECHO, CITY OF	UMATILLA COUNTY	09/13/74	05/15/84	09/03/10	05/15/84	No										
410218#	ELGIN, CITY OF	UNION COUNTY	12/19/75	11/15/78	11/15/78	11/15/78	No										
410062#	ELKTON, CITY OF	DOUGLAS COUNTY	09/13/74	09/05/79	02/17/10	09/05/79	No										
410225#	ENTERPRISE, CITY OF	WALLOWA COUNTY	12/28/73	01/23/76	02/17/88	02/17/88	No										
410016#	ESTACADA, CITY OF	CLACKAMAS COUNTY	11/09/73	06/17/08	(NSFHA)	06/30/76	No										
410122#	EUGENE, CITY OF	LANE COUNTY	06/07/74	09/29/86	06/02/99	09/29/86	No	10/01/91	10/01/01	7	15%	05%					
410180B	FAIRVIEW, CITY OF	MULTNOMAH COUNTY	05/10/74	09/30/87	02/01/19	09/30/87	No										
410188#	FALLS CITY, CITY OF	POLK COUNTY	05/10/74	07/07/81	12/19/06	07/07/81	No										
410123B	FLORENCE, CITY OF	LANE COUNTY	05/31/74	05/17/82	06/05/20	05/17/82	No										
410241B	FOREST GROVE, CITY OF	WASHINGTON COUNTY	03/01/74	03/15/82	10/19/18	03/15/82	No										
410246#	FOSSIL, CITY OF	WHEELER COUNTY	06/28/74	05/04/89	05/04/89	05/04/89	No										
410280A	GARIBALDI, CITY OF	TILLAMOOK COUNTY		04/17/78	09/28/18	04/17/78	No										
410242B	GASTON, TOWN OF	WASHINGTON COUNTY		07/05/82	11/04/16	07/05/82	No										
410159#	GATES, CITY OF	MARION COUNTY	07/02/76	12/04/79	01/19/00	12/04/79	No										
410030B	GEARHART, CITY OF	CLATSOP COUNTY	12/07/73	05/15/78	06/20/18	05/15/78	No										
410160#	GERVAIS, CITY OF	MARION COUNTY	06/28/74	06/30/76	(NSFHA)	06/30/76	No										
410070#	GILLIAM COUNTY *	GILLIAM COUNTY	06/07/77	09/24/84	09/24/84(M)	09/24/84	No										
410017#	GLADSTONE, CITY OF	CLACKAMAS COUNTY	04/05/74	03/15/77	06/17/08	03/15/77	No										
410063#	GLENDALE, CITY OF	DOUGLAS COUNTY	12/28/73	09/29/78	02/17/10	09/29/78	No										
410054B	GOLD BEACH, CITY OF	CURRY COUNTY	11/23/73	11/15/85	11/16/18	11/15/85	No										
410094#	GOLD HILL, CITY OF	JACKSON COUNTY	01/09/74	09/17/80	05/03/11	09/17/80	No										
410074A	GRANT COUNTY *	GRANT COUNTY	10/18/74	02/15/79	03/23/21	02/15/79	No										
410108#	GRANTS PASS, CITY OF	JOSEPHINE COUNTY	03/22/74	04/15/81	12/03/09	04/15/81	No	10/01/92	05/01/17	8	10%	05%					
410192#	GRASS VALLEY, CITY OF	SHERMAN COUNTY	11/22/74	09/24/84	09/24/84(M)	09/24/84	No										
410181B	GRESHAM, CITY OF	MULTNOMAH COUNTY	12/07/73	07/16/79	02/01/19	07/16/79	No										
410003#	HAINES, CITY OF	BAKER COUNTY	12/06/74	06/03/88	(NSFHA)	04/30/84	No										
410004#	HALFWAY, TOWN OF	BAKER COUNTY	09/26/75	09/24/84	06/03/88	09/24/84	No										
410139#	HALSEY, CITY OF	LINN COUNTY	11/22/74	09/29/10	(NSFHA)	07/21/78	No										
410026#	HAPPY VALLEY, CITY OF	CLACKAMAS COUNTY	12/20/74	12/04/79	06/17/08	12/04/79	No										
410083#	HARNEY COUNTY *	HARNEY COUNTY	04/18/78	04/17/84	04/17/84	04/17/84	No										
410140#	HARRISBURG, CITY OF	LINN COUNTY	03/01/74	02/03/82	09/29/10	02/03/82	No										
410208#	HELIX, CITY OF	UMATILLA COUNTY	12/20/74	06/01/84	09/03/10	06/01/84	No										
410175#	HEPPNER, CITY OF	MORROW COUNTY	11/23/73	04/01/81	12/18/07	04/01/81	No	05/01/06	05/01/16	9	05%	05%					
410209#	HERMISTON, CITY OF	UMATILLA COUNTY	04/05/74	10/28/77	09/03/10	10/28/77	No										
410243B	HILLSBORO, CITY OF	WASHINGTON COUNTY	04/12/74	05/17/82	10/19/18	05/17/82	No										
410085#	HINES, CITY OF	HARNEY COUNTY	11/30/73	09/28/84	11/03/89	09/28/84	No										
410086#	HOOD RIVER COUNTY *	HOOD RIVER COUNTY	12/06/77	09/24/84	09/24/84(M)	09/24/84	No										
410088#	HOOD RIVER, CITY OF	HOOD RIVER COUNTY	05/24/74	09/24/84	09/24/84(M)	09/24/84	No										
410161#	HUBBARD, CITY OF	MARION COUNTY	05/10/74	02/05/86	01/19/00	02/05/86	No										
410005#	HUNTINGTON, CITY OF	BAKER COUNTY	11/30/73	09/24/84	06/03/88	09/24/84	No										
410162#	IDANHA, CITY OF	LINN COUNTY	08/30/74	03/01/79	01/19/00	03/01/79	No										
410189#	INDEPENDENCE, CITY OF	POLK COUNTY	05/21/76	04/05/88	12/19/06	04/05/88	No										
410176#	IONE, CITY OF	MORROW COUNTY	11/22/74	04/01/81	12/18/07	04/01/81	No										

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410177#	IRRIGON, CITY OF	MORROW COUNTY	10/03/75	12/18/07	12/18/07	08/26/77	No					
410220#	ISLAND CITY, CITY OF	UNION COUNTY	08/30/74	09/29/78	09/30/87	09/29/78	No					
415589B	JACKSON COUNTY *	JACKSON COUNTY	04/11/78	04/01/82	01/19/18	04/01/82	No	10/01/91	05/01/02	7	15%	05%
410095#	JACKSONVILLE, CITY OF	JACKSON COUNTY	06/21/74	12/04/79	05/03/11	12/04/79	No					
410101#	JEFFERSON COUNTY *	JEFFERSON COUNTY	07/26/77	07/17/89	07/17/89	07/17/89	No					
410163#	JEFFERSON, CITY OF	MARION COUNTY	01/25/74	03/01/79	01/19/00	03/01/79	No					
410077#	JOHN DAY, CITY OF	GRANT COUNTY	03/22/74	09/15/77	02/23/82	09/15/77	No					
410150#	JORDAN VALLEY, CITY OF	MALHEUR COUNTY	02/07/75	09/19/84	09/19/84	09/19/84	No					
410226#	JOSEPH, CITY OF	WALLOWA COUNTY	05/24/74	12/05/75	02/17/88	02/17/88	No					
415590#	JOSEPHINE COUNTY *	JOSEPHINE COUNTY	08/16/77	06/01/82	12/03/09	06/01/82	No					
410124#	JUNCTION CITY, CITY OF	LANE COUNTY	05/10/74	06/15/82	06/02/99	06/15/82	No					
410288#	KEIZER, CITY OF	MARION COUNTY	08/15/79	05/01/85	01/19/00	08/15/79	No					
410269B	KING CITY, CITY OF	WASHINGTON COUNTY		02/18/05	10/19/18	02/11/76	No					
410109#	KLAMATH COUNTY *	KLAMATH COUNTY	12/27/74	12/18/84	12/18/84	12/18/84	No					
410112#	KLAMATH FALLS, CITY OF	KLAMATH COUNTY	06/28/74	06/05/85	06/05/85	06/05/85	No					
410260#	LA GRANDE, CITY OF	UNION COUNTY	11/30/73	09/30/80	04/03/96	09/30/80	No					
410057#	LA PINE, CITY OF	DESCHUTES COUNTY		09/28/07	09/28/07	12/06/07	No					
410254#	LAFAYETTE, CITY OF	YAMHILL COUNTY	11/30/73	06/15/82	03/02/10	06/15/82	No					
410115#	LAKE COUNTY *	LAKE COUNTY	01/31/78	12/05/89	12/05/89	12/05/89	No					
410018#	LAKE OSWEGO, CITY OF	MULTNOMAH COUNTY/CLACKAMAS COUNTY/WASHINGTON COUNTY	06/14/74	08/04/87	06/17/08	08/04/87	No					
410278C	LAKESIDE, CITY OF	COOS COUNTY	11/22/77	08/01/84	12/07/18	08/01/84	No					
410116#	LAKEVIEW, CITY OF	LAKE COUNTY	05/24/74	11/16/82	09/05/90	11/16/82	No					
415591B	LANE COUNTY*	LANE COUNTY	08/16/77	12/18/85	06/05/20	12/18/85	No	05/01/09	05/01/09	7	15%	05%
410141#	LEBANON, CITY OF	LINN COUNTY	11/30/73	07/02/81	09/29/10	07/02/81	No					
410178#	LEXINGTON, CITY OF	MORROW COUNTY	09/06/74	04/01/81	12/18/07	04/01/81	No					
410130B	LINCOLN CITY, CITY OF	LINCOLN COUNTY	11/08/74	04/17/78	10/18/19	04/17/78	No					
410129B	LINCOLN COUNTY *	LINCOLN COUNTY	01/17/75	09/03/80	10/18/19	09/03/80	No					

410136B	LINN COUNTY*	LINN COUNTY	12/06/77	09/29/86	12/08/16	09/29/86	No												
410078#	LONG CREEK, CITY OF	GRANT COUNTY	12/27/74	09/24/84	09/24/84(M)	09/24/84	No												
410227#	LOSTINE, CITY OF	WALLOWA COUNTY	11/08/74	11/08/74	02/17/88	02/17/88	No												
410125#	LOWELL, CITY OF	LANE COUNTY	03/29/74	06/02/99	06/02/99(M)	03/30/81	No												
410142#	LYONS, CITY OF	LINN COUNTY	03/08/74	12/15/81	09/29/10	12/15/81	No												
410103#	MADRAS, CITY OF	JEFFERSON COUNTY	06/28/74	07/17/89	07/17/89	07/17/89	No												
410149#	MALHEUR COUNTY*	MALHEUR COUNTY	04/04/78	09/29/86	09/29/86	09/29/86	No												
410199A	MANZANITA, CITY OF	TILLAMOOK COUNTY	10/18/74	05/01/78	09/28/18	05/01/78	No												
410154B	MARION COUNTY*	MARION COUNTY	01/24/75	08/15/79	10/18/19	08/15/79	No	05/01/01	05/01/07	6	20%	10%							
410233#	MAUPIN, CITY OF	WASCO COUNTY	12/13/74	09/24/84	09/24/84(M)	09/24/84	No												
410255#	MCMINNVILLE, CITY OF	YAMHILL COUNTY	02/15/74	12/01/82	03/02/10	12/01/82	No												
410096#	MEDFORD, CITY OF	JACKSON COUNTY	06/21/74	04/15/81	05/03/11	04/15/81	No	10/01/94	10/01/14	6	20%	10%							
410143#	MILL CITY, CITY OF	LINN COUNTY	12/14/73	03/01/79	09/29/10	03/01/79	No												
410284B	MILLERSBURG, CITY OF	LINN COUNTY	01/24/78	06/15/82	12/08/16	07/21/82	No												
410210#	MILTON-FREEWATER, CITY OF	UMATILLA COUNTY	11/16/73	09/12/78	09/03/10	09/12/78	No												
410019#	MILWAUKIE, CITY OF	MULTNOMAH COUNTY/CLACKAMAS COUNTY	04/05/74	06/18/80	06/17/08	06/18/80	No												
410247#	MITCHELL, CITY OF	WHEELER COUNTY	11/22/74	04/17/89	04/17/89	04/17/89	No												
410020#	MOLALLA, CITY OF	CLACKAMAS COUNTY	11/21/75	06/17/08	(NSFHA)	06/15/79	No												
410190#	MONMOUTH, CITY OF	POLK COUNTY	05/24/74	04/05/88	12/19/06	04/05/88	No												
410010#	MONROE, CITY OF	BENTON COUNTY	11/08/74	09/26/75	06/02/11	01/03/86	No												
410079#	MONUMENT, CITY OF	GRANT COUNTY	10/18/74	09/24/84	09/24/84(M)	09/24/84	No												
410173#	MORROW COUNTY *	MORROW COUNTY	01/24/75	04/01/81	12/18/07	04/01/81	No												
410234#	MOSIER, CITY OF	WASCO COUNTY	10/18/74	02/17/89	02/17/89	02/17/89	No												
410165#	MT. ANGEL, CITY OF	MARION COUNTY	05/14/74	01/19/00	(NSFHA)	06/30/76	No												
410080#	MT. VERNON, CITY OF	GRANT COUNTY	12/20/74	09/18/87	09/18/87	09/18/87	No												
410179B	MULTNOMAH COUNTY*	MULTNOMAH COUNTY	02/04/72	06/15/82	02/01/19	06/15/82	No												



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410064#	MYRTLE CREEK, CITY OF	DOUGLAS COUNTY	10/12/73	02/15/78	02/17/10	02/15/78	No	05/01/03	05/01/08	10		0%
410047C	MYRTLE POINT, CITY OF	COOS COUNTY	11/23/73	07/16/84	12/07/18	07/16/84	No					
410200A	NEHALEM, CITY OF	TILLAMOOK COUNTY	11/09/73	04/03/78	09/28/18	04/03/78	No	10/01/03	05/01/08	7	15%	05%
410256#	NEWBERG, CITY OF	YAMHILL COUNTY	06/14/74	03/01/82	03/02/10	03/01/82	No					
410131B	NEWPORT, CITY OF	LINCOLN COUNTY	05/24/74	04/15/80	10/18/19	04/15/80	No					
410048C	NORTH BEND, CITY OF	COOS COUNTY	06/28/74	08/01/84	12/07/18	08/01/84	No					
410270B	NORTH PLAINS, CITY OF	WASHINGTON COUNTY	07/16/76	04/01/82	10/19/18	04/01/82	No					
410221#	NORTH POWDER, CITY OF	UNION COUNTY	08/30/74	09/29/78	09/29/78	09/29/78	No					
410151	NYSSA, CITY OF	MALHEUR COUNTY	11/30/73	12/14/82	12/14/82(M)	12/14/82	No					
410271#	OAKLAND, CITY OF	DOUGLAS COUNTY	08/06/76	06/19/85	02/17/10	06/19/85	No					
410126#	OAKRIDGE, CITY OF	LANE COUNTY	05/10/74	06/03/86	06/02/99	06/03/86	No					
410152#	ONTARIO, CITY OF	MALHEUR COUNTY	11/30/73	04/17/84	04/17/84	04/17/84	No					
410021#	OREGON CITY, CITY OF	CLACKAMAS COUNTY	12/28/73	02/15/80	06/17/08	02/15/80	No	10/01/03	05/01/18	8	10%	05%
410117#	PAISLEY, CITY OF	LAKE COUNTY	09/13/74	09/15/89	09/15/89	09/15/89	No					
410211#	PENDLETON, CITY OF	UMATILLA COUNTY	05/24/73	11/03/78	09/03/10	07/13/76	No					
410011#	PHILOMATH, CITY OF	BENTON COUNTY	02/22/74	06/15/82	06/02/11	06/15/82	No					
410097#	PHOENIX, CITY OF	JACKSON COUNTY	06/21/74	05/03/82	05/03/11	05/03/82	No					
410212#	PILOT ROCK, CITY OF	UMATILLA COUNTY	11/16/73	08/04/88	09/03/10	08/04/88	No					
410186#	POLK COUNTY*	POLK COUNTY	02/07/75	02/15/78	12/19/06	02/15/78	No	10/01/91	10/01/01	8	10%	05%
410272B	PORT ORFORD, CITY OF	CURRY COUNTY	04/30/76	01/29/80	11/16/18	01/29/80	No					
410183#	PORTLAND, CITY OF	WASHINGTON COUNTY/CLACKAMAS COUNTY/MULTNOMAH COUNTY	01/10/75	10/15/80	11/26/10	10/15/80	No	10/01/01	10/01/20	5	25%	10%
410049C	POWERS, CITY OF	COOS COUNTY	11/23/73	06/30/76	12/07/18	06/30/76	No					
410082#	PRAIRIE CITY, CITY OF	GRANT COUNTY	10/18/74	02/17/88	02/17/88	02/17/88	No					
410037#	PRESOTT, CITY OF	COLUMBIA COUNTY	01/10/75	08/16/88	11/26/10	08/16/88	No					
410051#	PRINEVILLE, CITY OF	CROOK COUNTY	11/30/73	07/17/89	02/02/12	07/17/89	No					
410038#	RAINIER, CITY OF	COLUMBIA COUNTY	05/24/74	08/16/88	11/26/10	08/16/88	No					
410065B	REEDSPORT, CITY OF	DOUGLAS COUNTY	06/21/74	04/03/84	03/23/21	04/03/84	No					
410066#	RIDDLE, CITY OF	DOUGLAS COUNTY	06/07/74	08/01/79	02/17/10	08/01/79	No					
410022#	RIVERGROVE, CITY OF	CLACKAMAS COUNTY/WASHINGTON COUNTY	12/06/74	08/04/87	06/17/08	08/04/87	No					
410201A	ROCKAWAY BEACH, CITY OF	TILLAMOOK COUNTY	06/14/74	09/29/78	09/28/18	09/29/78	No	10/01/04	10/01/13	10		0%
410098#	ROGUE RIVER, CITY OF	JACKSON COUNTY	05/31/74	01/02/80	05/03/11	01/02/81	No	10/01/92	05/01/17	8	10%	05%
410067#	ROSEBURG, CITY OF	DOUGLAS COUNTY	06/07/74	06/01/77	02/17/10	06/01/77	No	10/01/94	05/01/19	7	15%	05%
410194#	RUFUS, CITY OF	SHERMAN COUNTY	12/13/74	09/24/84	09/24/84(M)	09/24/84	No					
410167B	SALEM, CITY OF	POLK COUNTY/MARION COUNTY	08/09/74	06/15/79	10/18/19	06/15/79	No	05/01/08	10/01/16	5	25%	10%
410023B	SANDY, CITY OF	CLACKAMAS COUNTY	04/12/74	12/11/79	01/18/19	12/11/79	No					
410039#	SCAPOOSE, CITY OF	COLUMBIA COUNTY	05/17/74	12/19/75	11/26/10	08/16/88	No	10/01/93	10/01/18	8	10%	05%
410144#	SCIO, CITY OF	LINN COUNTY	11/22/74	08/01/84	09/29/10	08/01/84	No	05/01/04	05/01/14	10		0%
410168#	SCOTTS MILLS, CITY OF	MARION COUNTY	12/20/74	03/01/79	01/19/00	03/01/79	No					
410032B	SEASIDE, CITY OF	CLATSOP COUNTY	12/07/73	09/05/79	06/20/18	09/05/79	No					
410081A	SENECA, CITY OF	GRANT COUNTY	11/22/74	09/24/84	03/23/21(M)	09/24/84	No					
410099C	SHADY COVE, CITY OF	JACKSON COUNTY	08/23/74	09/30/80	01/19/18	09/30/80	No					
410257#	SHERIDAN, CITY OF	YAMHILL COUNTY	10/18/74	08/01/90	03/02/10	08/01/80	No	10/01/01	04/01/21	8	10%	05%
410191#	SHERMAN COUNTY *	SHERMAN COUNTY	10/18/77	09/24/84	09/24/84(M)	09/24/84	No					
410273B	SHERWOOD, CITY OF	WASHINGTON COUNTY	08/13/76	01/06/82	10/19/18	01/06/82	No					

410132B	SILETZ, CITY OF	LINCOLN COUNTY	03/19/76	03/01/79	10/18/19	03/01/79	No												
410169#	SILVERTON, CITY OF	MARION COUNTY	05/10/74	03/01/79	01/19/00	03/01/79	No												
410058#	SISTERS, CITY OF	DESCHUTES COUNTY	12/07/73	09/29/86	09/28/07	09/29/86	No												
410248#	SPRAY, CITY OF	WHEELER COUNTY	08/30/74	08/16/88	08/16/88(M)	08/16/88	No												
415592#	SPRINGFIELD, CITY OF	LANE COUNTY	06/18/71	09/27/85	06/02/99	09/27/85	No												
410040#	ST. HELENS, CITY OF	COLUMBIA COUNTY	11/30/73	09/29/86	11/26/10	09/29/86	No												
410166#	ST. PAUL, CITY OF	MARION COUNTY	11/22/74	01/19/00	(NSFHA)	07/01/84	No												
410213#	STANFIELD, CITY OF	UMATILLA COUNTY	11/09/73	08/15/84	09/03/10	08/15/84	No	10/01/91	10/01/15	10								0%	



Community Status Book Report

Communities Participating in the National Flood Program



OREGON

[Click here for not participating](#)

CID	Community Name	County	Init FHB Identified	Init FIRM Identified	Curr Eff Map Date	Reg-Emer Date	Tribal	CRS Entry Date	Curr Eff Date	Curr Class	% Disc SFHA	% Disc Non SFHA
410170#	STAYTON, CITY OF	MARION COUNTY	01/18/74	03/01/79	01/19/00	03/01/79	No					
410222#	SUMMERVILLE, CITY OF	UNION COUNTY	06/05/79	01/15/80	01/15/80(M)	01/15/80	No					
410007#	SUMPTER, CITY OF	BAKER COUNTY	12/24/76	09/24/84	06/03/88	09/24/84	No					
410275#	SUTHERLIN, CITY OF	DOUGLAS COUNTY		02/17/10	02/17/10(M)	05/21/97	No					
410146#	SWEET HOME, CITY OF	LINN COUNTY	01/18/74	03/01/82	09/29/10	03/01/82	No					
410100#	TALENT, CITY OF	JACKSON COUNTY	05/31/74	02/01/80	05/03/11	02/01/80	No	10/01/00	05/01/16	8	10%	05%
410147#	TANGENT, CITY OF	LINN COUNTY	06/25/76	05/17/82	09/29/10	05/17/82	No					
410237#	THE DALLES, CITY OF	WASCO COUNTY	05/24/74	01/18/84	01/18/84(M)	01/18/84	No					
410276B	TIGARD, CITY OF	WASHINGTON COUNTY	02/14/78	03/01/82	10/19/18	03/01/82	No					
410196A	TILLAMOOK COUNTY *	TILLAMOOK COUNTY		08/01/78	09/28/18	08/01/78	No	04/01/01	10/01/13	10		0%
410202A	TILLAMOOK, CITY OF	TILLAMOOK COUNTY	06/07/74	05/01/78	09/28/18	05/01/78	No	10/01/06	10/01/16	9	05%	05%
410133B	TOLEDO, CITY OF	LINCOLN COUNTY	09/14/73	03/01/79	10/18/19	03/01/79	No					
410184B	TROUTDALE, CITY OF	MULTNOMAH COUNTY	12/07/73	09/30/88	02/01/19	09/30/88	No	05/01/08	05/01/13	7	15%	05%
410277B	TUALATIN, CITY OF	WASHINGTON COUNTY/CLACKAMAS COUNTY	05/20/77	02/17/82	10/19/18	02/17/82	No					
410171B	TURNER, CITY OF	MARION COUNTY	01/16/74	04/02/79	10/18/19	04/02/79	No					
410279#	UKIAH, CITY OF	UMATILLA COUNTY	05/29/79	09/24/84	09/03/10(M)	09/24/84	No					
410204#	UMATILLA COUNTY*	UMATILLA COUNTY		06/15/78	09/03/10	06/15/78	No					
410012#	UMATILLA INDIAN RESERVATION, CONFEDERATED TRIBE OF	UMATILLA COUNTY		09/03/10	09/03/10	02/14/11	Yes					
410214#	UMATILLA, CITY OF	UMATILLA COUNTY	11/09/73	09/24/84	09/03/10(M)	09/24/84	No					
410216#	UNION COUNTY *	UNION COUNTY	10/25/77	05/15/80	04/03/96	05/15/80	No					
410223#	UNION, CITY OF	UNION COUNTY	03/05/76	12/15/78	12/15/78	12/15/78	No					
410153#	VALE, CITY OF	MALHEUR COUNTY	11/30/73	09/04/87	09/04/87	09/04/87	No					
410128#	VENETA, CITY OF	LANE COUNTY	03/22/74	02/01/84	06/02/99	02/01/84	No					
410041#	VERNONIA, CITY OF	COLUMBIA COUNTY	11/30/73	08/16/88	11/26/10	08/16/88	No					
410134B	WALDPORT, CITY OF	LINCOLN COUNTY	03/22/74	03/15/79	10/18/19	03/15/79	No					
410224#	WALLOWA COUNTY*	WALLOWA COUNTY	06/28/77	06/28/77	02/17/88	02/17/88	No					
410228#	WALLOWA, CITY OF	WALLOWA COUNTY	12/28/73	04/23/76	02/17/88	02/17/88	No					
410291#	WARM SPRINGS RESERVATION, CONFEDERATED TRIBES OF	WASCO COUNTY/JEFFERSON COUNTY		04/15/02	04/15/02	04/15/02	Yes					
410033B	WARRENTON, CITY OF	CLATSOP COUNTY	06/28/74	05/15/78	06/20/18	05/15/78	No					
	Includes the City of Hammond											
410229	WASCO COUNTY *	WASCO COUNTY	02/21/75	09/24/84	09/24/84(M)	09/24/84	No					
410195#	WASCO, CITY OF	SHERMAN COUNTY	10/22/76	09/15/89	09/15/89	09/15/89	No					
410238B	WASHINGTON COUNTY*	WASHINGTON COUNTY	01/24/75	09/30/82	10/19/18	09/30/82	No					
410148#	WATERLOO, CITY OF	LINN COUNTY	11/28/75	09/29/10	(NSFHA)	05/25/78	No					
410024#	WEST LINN, CITY OF	CLACKAMAS COUNTY	12/17/73	03/15/77	06/17/08	03/15/77	No					
410289#	WESTFIR, CITY OF	LANE COUNTY	12/04/84	08/19/85	06/02/99	09/06/85	No					
410215#	WESTON, CITY OF	UMATILLA COUNTY	05/17/74	09/18/87	09/03/10	09/18/87	No					
410245#	WHEELER COUNTY *	WHEELER COUNTY	05/31/77	07/17/89	07/17/89	07/17/89	No					
410203A	WHEELER, CITY OF	TILLAMOOK COUNTY	09/13/74	11/16/77	09/28/18	11/16/77	No					
410258#	WILLAMINA, CITY OF	YAMHILL COUNTY	12/28/73	03/15/82	03/02/10	03/15/82	No					
410025#	WILSONVILLE, CITY OF	WASHINGTON COUNTY/CLACKAMAS COUNTY	03/29/74	01/06/82	06/17/08	01/06/82	No					
415593#	WINSTON, CITY OF	DOUGLAS COUNTY		12/31/74	02/17/10	09/14/73	No					
410185B	WOOD VILLAGE, CITY OF	MULTNOMAH COUNTY	05/10/74	12/18/09	(NSFHA)	11/20/85	No					
410172#	WOODBURN, CITY OF	MARION COUNTY	05/24/74	03/01/79	01/19/00	03/01/79	No					
410135B	YACHATS, CITY OF	LINCOLN COUNTY	11/01/74	03/01/79	10/18/19	03/01/79	No					
410249#	YAMHILL COUNTY *	YAMHILL COUNTY	12/27/74	09/30/83	03/02/10	09/30/83	No					
410259#	YAMHILL, CITY OF	YAMHILL COUNTY	11/30/73	03/01/82	03/02/10	03/01/82	No					
410069#	YONCALLA, CITY OF	DOUGLAS COUNTY	04/05/74	02/17/10	02/17/10(M)	08/21/78	No					

Community Status Book Report

Communities Participating in the National Flood Program

OREGON

**FEMA**[Click here for not participating](#)

CID	Community Name	County	Init FHBM Identified	Init FIRM Identified	Curr Eff Map Date	Reg-Emer Date	Tribal	CRS Entry Date	Curr Eff Date	Curr Class	% Disc SFHA	% Disc Non SFHA
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Summary:

Total In Flood Program	261
Total In Emergency Program	0
Total In the Regular Program	261
Total In Regular Program with No Special Flood Hazard	9
Total In Regular Program But Minimally Flood Prone	30

**FEMA**

Community Status Book Report

Communities Not in the National Flood Program

**OREGON**

CID	Community Name	County	Init FHBM Identified	Init FIRM Identified	Curr Eff Map Date	Sanction Date	Tribal	CRS Entry Date	Curr Eff Date	Curr Class	% Disc SFHA	% Disc Non SFHA
410089#	ADAIR VILLAGE, CITY OF	BENTON COUNTY		06/02/11	06/02/11	06/02/12	No					
415594#	SODAVILLE, CITY OF	LINN COUNTY		09/29/10	09/29/10	09/29/11	No					

Summary:

Total Not in Flood Program	2
Total Suspended from Emergency Program	0
Total Suspended from Regular Program	0
Total Withdrawn Communities Not In Program	0
Total Not In Program With Hazard Area Identified	2

Total Not In Program With Hazard Area Identified < 1 Year

0

Legend:

(E)	Indicates Entry In Emergency Program
NSFHA	No Special Flood Hazard Area - All Zone C
(>)	Date of Current Effective Map is after the Date of This Report
N/A	Not Applicable At This Time
(S)	Suspended Community
(W)	Withdrawn Community
(M)	No Elevation Determined - All Zone A, C and X
(L)	Original FIRM by Letter - All Zone A, C and X

Wetlands (CEST and EA)

General requirements	Legislation	Regulation
Executive Order 11990 discourages that direct or indirect support of new construction impacting wetlands wherever there is a practicable alternative. The Fish and Wildlife Service's National Wetlands Inventory can be used as a primary screening tool, but observed or known wetlands not indicated on NWI maps must also be processed. Off-site impacts that result in draining, impounding, or destroying wetlands must also be processed.	Executive Order 11990	24 CFR 55.20 can be used for general guidance regarding the 8 Step Process.
References		
https://www.hudexchange.info/environmental-review/wetlands-protection		

1. Does this project involve new construction as defined in Executive Order 11990, expansion of a building's footprint, or ground disturbance?

The term "new construction" shall include draining, dredging, channelizing, filling, diking, impounding, and related activities and any structures or facilities begun or authorized after the effective date of the Order.

☒ No → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.*

☐ Yes → *Continue to Question 2.*

2. Will the new construction or other ground disturbance impact an on- or off-site wetland?

The term "wetlands" means those areas that are inundated by surface or ground water with a frequency sufficient to support, and under normal circumstances does or would support, a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bogs, and similar areas such as sloughs, potholes, wet meadows, river overflows, mud flats, and natural ponds. Wetlands under E.O. 11990 include isolated and non-jurisdictional wetlands.

☐ No, a wetland will not be impacted in terms of E.O. 11990's definition of new construction.
→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map or any other relevant documentation to explain your determination.*

☐ Yes, there is a wetland that be impacted in terms of E.O. 11990's definition of new construction.

→ You must determine that there are no practicable alternatives to wetlands development by completing the 8-Step Process.

Provide a completed 8-Step Process as well as all documents used to make your determination, including a map. Be sure to include the early public notice and the final notice with your documentation.

Continue to Question 3.

- 3. For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.**

Which of the following mitigation actions have been or will be taken? Select all that apply:

- ☐ Permeable surfaces
- ☐ Natural landscape enhancements that maintain or restore natural hydrology through infiltration
- ☐ Native plant species
- ☐ Bioswales
- ☐ Evapotranspiration
- ☐ Stormwater capture and reuse
- ☐ Green or vegetative roofs with drainage provisions
- ☐ Natural Resources Conservation Service conservation easements
- ☐ Compensatory mitigation

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

The policies and procedures do not allow new construction, alternation, or expansion of the footprint of any existing structure located in a Wetland. See Attachment 3 of the Policies and Procedures as such is determined exempt from this requirement. NWU Policy requires each project to be checked against the NWI (National Wetlands Inventory) in the site specific environmental review to ensure compliance this rule. We will not allow impacts to wetlands. See Attachment 3 of the Policies and Procedures.

Are formal compliance steps or mitigation required?

☐ Yes

☒ No

Coastal Zone Management Act (CEST and EA)

General requirements	Legislation	Regulation
Federal assistance to applicant agencies for activities affecting any coastal use or resource is granted only when such activities are consistent with federally approved State Coastal Zone Management Act Plans.	Coastal Zone Management Act (16 USC 1451-1464), particularly section 307(c) and (d) (16 USC 1456(c) and (d))	15 CFR Part 930
References		
https://www.onecpd.info/environmental-review/coastal-zone-management		

Projects located in the following states must complete this form.

Alabama	Florida	Louisiana	Mississippi	Ohio	Texas
Alaska	Georgia	Maine	New Hampshire	Oregon	Virgin Islands
American Samona	Guam	Maryland	New Jersey	Pennsylvania	Virginia
California	Hawaii	Massachusetts	New York	Puerto Rico	Washington
Connecticut	Illinois	Michigan	North Carolina	Rhode Island	Wisconsin
Delaware	Indiana	Minnesota	Northern Mariana Islands	South Carolina	

1. Is the project located in, or does it affect, a Coastal Zone as defined in your state Coastal Management Plan?

☐ Yes → Continue to Question 2.

☒ No → Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing that the site is not within a Coastal Zone.

2. Does this project include activities that are subject to state review?

☐ Yes → Continue to Question 3.

☐ No → Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation used to make your determination.

3. Has this project been determined to be consistent with the State Coastal Management Program?

☐ Yes, with mitigation. → Continue to Question 4.

☐ Yes, without mitigation. → Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation used to make your determination.

☐ No, project must be canceled.

Project cannot proceed at this location.

4. Explain in detail the proposed measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.

→ *Continue to the Worksheet Summary below. Provide documentation of the consultation (including the State Coastal Management Program letter of consistency) and any other documentation used to make your determination.*

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

The project does not permit substantial/major rehabilitation exceeding 50% of the market value of the home and is restricted to the minor rehabilitation of single-family owner-occupied homes without changes, expansions, or alternations to the footprint of the home. The program is determined to be exempt from Coastal Zone Management Act requirements. See Attachment 3 of the Policies and Procedures.

Are formal compliance steps or mitigation required?

☐ Yes

☒ No



Sole Source Aquifers (CEST and EA)

General requirements	Legislation	Regulation
The Safe Drinking Water Act of 1974 protects drinking water systems which are the sole or principal drinking water source for an area and which, if contaminated, would create a significant hazard to public health.	Safe Drinking Water Act of 1974 (42 U.S.C. 201, 300f et seq., and 21 U.S.C. 349)	40 CFR Part 149
Reference		
https://www.hudexchange.info/environmental-review/sole-source-aquifers		

1. Does your project consist solely of acquisition, leasing, or rehabilitation of an existing building(s)?

☒ Yes → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.*

☐ No → *Continue to Question 2.*

2. Is the project located on a sole source aquifer (SSA)¹?

☐ No → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation used to make your determination, such as a map of your project (or jurisdiction, if appropriate) in relation to the nearest SSA and its source area.*

☐ Yes → *Continue to Question 3.*

3. Does your region have a memorandum of understanding (MOU) or other working agreement with EPA for HUD projects impacting a sole source aquifer?

Contact your Field or Regional Environmental Officer or visit the HUD webpage at the link above to determine if an MOU or agreement exists in your area.

☐ Yes → *Provide the MOU or agreement as part of your supporting documentation. Continue to Question 4.*

☐ No → *Continue to Question 5.*

4. Does your MOU or working agreement exclude your project from further review?

☐ Yes → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation used to make your determination and document where your project fits within the MOU or agreement.*

¹ A sole source aquifer is defined as an aquifer that supplies at least 50 percent of the drinking water consumed in the area overlying the aquifer. This includes streamflow source areas, which are upstream areas of losing streams that flow into the recharge area.

☐ No → *Continue to Question 5.*

5. Will the proposed project contaminate the aquifer and create a significant hazard to public health?

Consult with your Regional EPA Office. Your consultation request should include detailed information about your proposed project and its relationship to the aquifer and associated streamflow source area. EPA will also want to know about water, storm water and waste water at the proposed project. Follow your MOU or working agreement or contact your Regional EPA office for specific information you may need to provide. EPA may request additional information if impacts to the aquifer are questionable after this information is submitted for review.

☐ No → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide your correspondence with the EPA and all documents used to make your determination.*

☐ Yes → *Work with EPA to develop mitigation measures. If mitigation measures are approved, attach correspondence with EPA and include the mitigation measures in your environmental review documents and project contracts. If EPA determines that the project continues to pose a significant risk to the aquifer, federal financial assistance must be denied. Continue to Question 6.*

6. In order to continue with the project, any threat must be mitigated, and all mitigation must be approved by the EPA. Explain in detail the proposed measures that can be implemented to mitigate for the impact or effect, including the timeline for implementation.

→ *Continue to the Worksheet Summary below. Provide documentation of the consultation (including the Managing Agency's concurrence) and any other documentation used to make your determination.*

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

The Designated Area contains no Sole Source Aquifers; therefore, the project is determined to be in compliance with this authority. See attached checklist and print of map from EPA's Sole Source Aquifers for Drinking Water Interactive map found at: <https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=9ebb047ba3ec41ada1877155fe31356b>

Are formal compliance steps or mitigation required?

☐ Yes

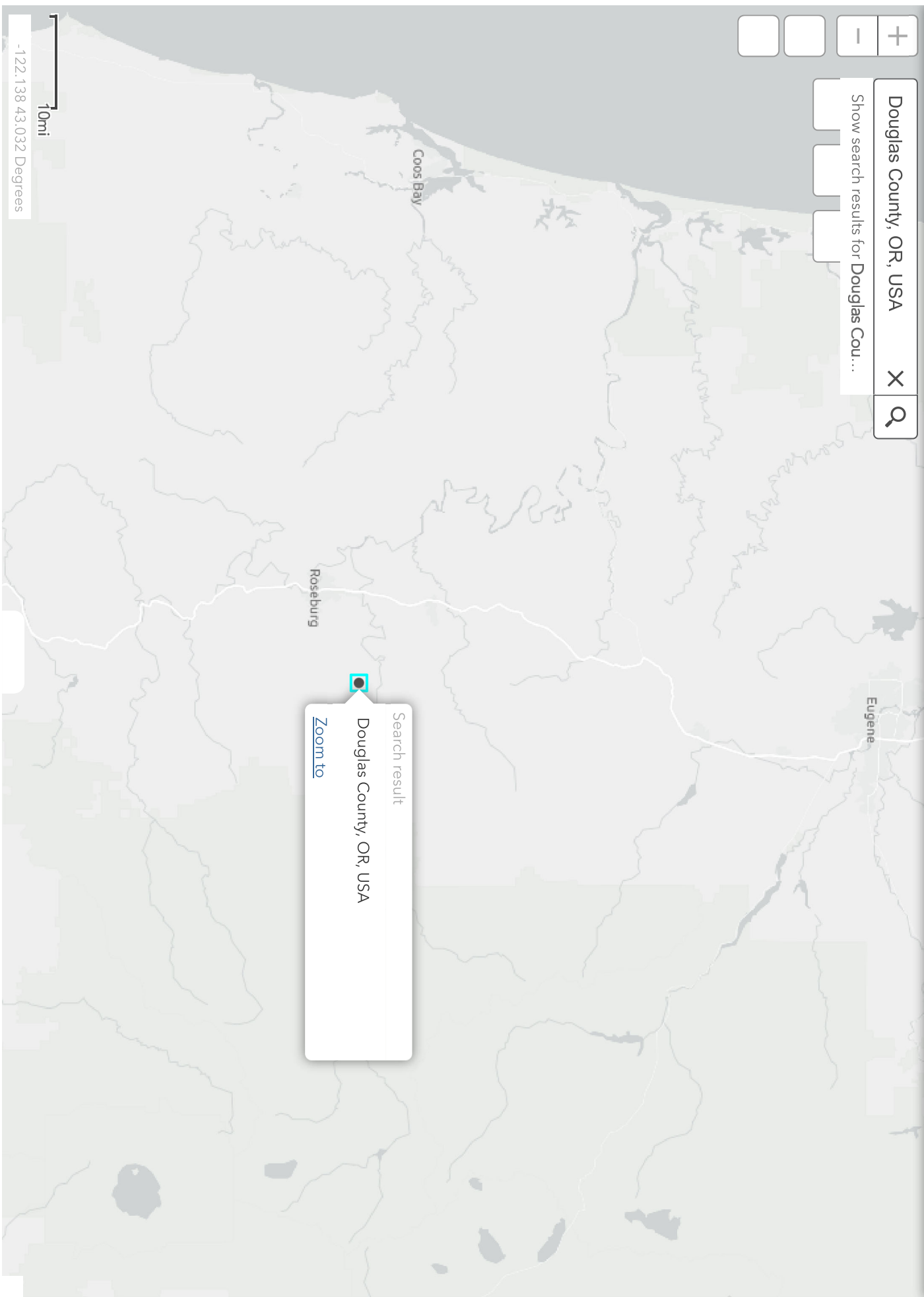
☒ No



Douglas County, OR, USA



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Endangered Species Act (CEST and EA)

General requirements	ESA Legislation	Regulations
Section 7 of the Endangered Species Act (ESA) mandates that federal agencies ensure that actions that they authorize, fund, or carry out shall not jeopardize the continued existence of federally listed plants and animals or result in the adverse modification or destruction of designated critical habitat. Where their actions may affect resources protected by the ESA, agencies must consult with the Fish and Wildlife Service and/or the National Marine Fisheries Service ("FWS" and "NMFS" or "the Services").	The Endangered Species Act of 1973 (16 U.S.C. 1531 <i>et seq.</i>); particularly section 7 (16 USC 1536).	50 CFR Part 402
References		
https://www.hudexchange.info/environmental-review/endangered-species		

1. Does the project involve any activities that have the potential to affect species or habitats?

☒ No, the project will have No Effect due to the nature of the activities involved in the project.

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.

☐ No, the project will have No Effect based on a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office.

Explain your determination:

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.

☐ Yes, the activities involved in the project have the potential to affect species and/or habitats. → Continue to Question 2.

2. Are federally listed species or designated critical habitats present in the action area?

Obtain a list of protected species from the Services. This information is available on the [FWS Website](#) or you may contact your [local FWS](#) and/or [NMFS](#) offices directly.

☐ No, the project will have No Effect due to the absence of federally listed species and designated critical habitat.

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination. Documentation

may include letters from the Services, species lists from the Services' websites, surveys or other documents and analysis showing that there are no species in the action area.

- ☐ Yes, there are federally listed species or designated critical habitats present in the action area. → *Continue to Question 3.*

3. What effects, if any, will your project have on federally listed species or designated critical habitat?

- ☐ No Effect: Based on the specifics of both the project and any federally listed species in the action area, you have determined that the project will have absolutely no effect on listed species or critical habitat.

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination. Documentation should include a species list and explanation of your conclusion, and may require maps, photographs, and surveys as appropriate.*

- ☐ May Affect, Not Likely to Adversely Affect: Any effects that the project may have on federally listed species or critical habitats would be beneficial, discountable, or insignificant.

→ *Continue to Question 4, Informal Consultation.*

- ☐ Likely to Adversely Affect: The project may have negative effects on one or more listed species or critical habitat.

→ *Continue to Question 5, Formal Consultation.*

4. Informal Consultation is required

Section 7 of ESA (16 USC. 1536) mandates consultation to resolve potential impacts to endangered and threatened species and critical habitats. If a HUD-assisted project may affect any federally listed endangered or threatened species or critical habitat, then compliance is required with Section 7. See 50 CFR Part 402 Subpart B Consultation Procedures.

Did the Service(s) concur with the finding that the project is Not Likely to Adversely Affect?

- ☐ Yes, the Service(s) concurred with the finding.

→ *Based on the response, the review is in compliance with this section. Continue to Question 6 and provide the following:*

- (1) A biological evaluation or equivalent document*
- (2) Concurrence(s) from FWS and/or NMFS*
- (3) Any other documentation of informal consultation*

Exception: If finding was made based on procedures provided by a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office, provide whatever documentation is mandated by that agreement.

☐ No, the Service(s) did not concur with the finding. → *Continue to Question 5.*

5. Formal consultation is required

Section 7 of ESA (16 USC 1536) mandates consultation to resolve potential impacts to federally listed endangered and threatened species and critical habitats. If a HUD assisted project may affect any endangered or threatened species or critical habitat, then compliance is required with Section 7. See 50 CFR Part 402 Subpart B Consultation Procedures.

→ *Once consultation is complete, the review is in compliance with this section. Continue to Question 6 and provide the following:*

- (1) A biological assessment, evaluation, or equivalent document*
- (2) Biological opinion(s) issued by FWS and/or NMFS*
- (3) Any other documentation of formal consultation*

6. For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the proposed measures that will be implemented to mitigate for the impact or effect, including the timeline for implementation.

☐ Mitigation as follows will be implemented:

☐ No mitigation is necessary.

Explain why mitigation will not be made here:

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

Douglas County is considered a critical habitat covered by NOAA and USFWS, for a few endangered or threatened species, and the area to be served by the project overlaps this covered habitat. However, the written program Policies and Procedures only allow minor housing rehabilitation and do not allow CDBG funds to be used for new construction, conversion of land use, major rehabilitation or the acquisition of undeveloped land, landscaping, or hazardous tree removal and none of the assisted properties will be located in a riparian zone. No exterior repairs or improvements will increase post-construction runoff nor will the amount of impervious surfaces be increased. All waste materials generated from project activities will be disposed of in an EPA-approved sanitary or hazardous waste disposal site. See Attachment 3 of the Policies and Procedures.

Based on this, it is determined that a No Effect on an ESA-listed species or designated critical habitat has been achieved.

The determination checklist is included in the ERR file.

Are formal compliance steps or mitigation required?

☐ Yes

☒ No

IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

Location

Douglas County, Oregon



Local offices

Oregon Fish And Wildlife Office

☎ (503) 231-6179

📠 (503) 231-6195

2600 Southeast 98th Avenue, Suite 100

Portland, OR 97266-1398

<https://www.fws.gov/oregonfwo/articles.cfm?id=149489416>

Klamath Falls Fish And Wildlife Office

☎ (541) 885-8481

📠 (541) 885-7837

1936 California Avenue

Klamath Falls, OR 97601

Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species¹ and their critical habitats are managed by the [Ecological Services Program](#) of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries²).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact [NOAA Fisheries](#) for [species under their jurisdiction](#).

1. Species listed under the Endangered Species Act are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the [listing status page](#) for more information. IPaC only shows species that are regulated by USFWS (see FAQ).
2. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

Mammals

NAME	STATUS
<p>Columbian White-tailed Deer <i>Odocoileus virginianus leucurus</i></p> <p>No critical habitat has been designated for this species.</p> <p>https://ecos.fws.gov/ecp/species/154</p>	Threatened
<p>Gray Wolf <i>Canis lupus</i></p> <p>There is final critical habitat for this species. The location of the critical habitat is not available.</p> <p>https://ecos.fws.gov/ecp/species/4488</p>	Endangered
<p>Pacific Marten, Coastal Distinct Population Segment <i>Martes caurina</i></p> <p>Wherever found</p> <p>There is proposed critical habitat for this species. Your location overlaps the critical habitat.</p> <p>https://ecos.fws.gov/ecp/species/9081</p>	Threatened

Birds

NAME	STATUS
<p>Marbled Murrelet <i>Brachyramphus marmoratus</i></p> <p>There is final critical habitat for this species. Your location overlaps the critical habitat.</p> <p>https://ecos.fws.gov/ecp/species/4467</p>	Threatened

Northern Spotted Owl *Strix occidentalis caurina*

Threatened

Wherever found

There is **final** critical habitat for this species. Your location overlaps the critical habitat.<https://ecos.fws.gov/ecp/species/1123>**Short-tailed Albatross** *Phoebastria (=Diomedea) albatrus*

Endangered

Wherever found

No critical habitat has been designated for this species.

<https://ecos.fws.gov/ecp/species/433>**Western Snowy Plover** *Charadrius nivosus nivosus*

Threatened

There is **final** critical habitat for this species. Your location overlaps the critical habitat.<https://ecos.fws.gov/ecp/species/8035>

Reptiles

NAME

STATUS

Leatherback Sea Turtle *Dermochelys coriacea*

Endangered

Wherever found

There is **final** critical habitat for this species. The location of the critical habitat is not available.<https://ecos.fws.gov/ecp/species/1493>**Loggerhead Sea Turtle** *Caretta caretta*

Endangered

No critical habitat has been designated for this species.

<https://ecos.fws.gov/ecp/species/1110>**Olive Ridley Sea Turtle** *Lepidochelys olivacea*

Threatened

No critical habitat has been designated for this species.

<https://ecos.fws.gov/ecp/species/1513>

Fishes

NAME	STATUS
Bull Trout <i>Salvelinus confluentus</i> There is final critical habitat for this species. The location of the critical habitat is not available. https://ecos.fws.gov/ecp/species/8212	Threatened
Lost River Sucker <i>Deltistes luxatus</i> Wherever found There is final critical habitat for this species. The location of the critical habitat is not available. https://ecos.fws.gov/ecp/species/5604	Endangered
Shortnose Sucker <i>Chasmistes brevirostris</i> Wherever found There is final critical habitat for this species. The location of the critical habitat is not available. https://ecos.fws.gov/ecp/species/7160	Endangered

Insects

NAME	STATUS
Fender's Blue Butterfly <i>Icaricia icarioides fenderi</i> Wherever found There is final critical habitat for this species. The location of the critical habitat is not available. https://ecos.fws.gov/ecp/species/6659	Endangered

Franklin's Bumble Bee *Bombus franklini*

Endangered

Wherever found

No critical habitat has been designated for this species.

<https://ecos.fws.gov/ecp/species/7022>**Monarch Butterfly** *Danaus plexippus*

Candidate

Wherever found

No critical habitat has been designated for this species.

<https://ecos.fws.gov/ecp/species/9743>

Flowering Plants

NAME

STATUS

Applegate's Milk-vetch *Astragalus applegatei*

Endangered

Wherever found

No critical habitat has been designated for this species.

<https://ecos.fws.gov/ecp/species/5497>**Gentner's Fritillary** *Fritillaria gentneri*

Endangered

Wherever found

No critical habitat has been designated for this species.

<https://ecos.fws.gov/ecp/species/8120>**Kincaid's Lupine** *Lupinus sulphureus* ssp. *kincaidii*

Threatened

Wherever found

There is **final** critical habitat for this species. The location of the critical habitat is not available.<https://ecos.fws.gov/ecp/species/3747>

Rough Popcornflower *Plagiobothrys hirtus*

Endangered

Wherever found

No critical habitat has been designated for this species.

<https://ecos.fws.gov/ecp/species/2500>**Willamette Daisy** *Erigeron decumbens*

Endangered

Wherever found

There is **final** critical habitat for this species. The location of the critical habitat is not available.<https://ecos.fws.gov/ecp/species/6270>

Conifers and Cycads

NAME

STATUS

Whitebark Pine *Pinus albicaulis*

Proposed Threatened

Wherever found

No critical habitat has been designated for this species.

<https://ecos.fws.gov/ecp/species/1748>

Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

This location overlaps the critical habitat for the following species:

NAME

TYPE

Marbled Murrelet *Brachyramphus marmoratus*

Final

<https://ecos.fws.gov/ecp/species/4467#crithab>**Northern Spotted Owl** *Strix occidentalis caurina*

Final

<https://ecos.fws.gov/ecp/species/1123#crithab>

Pacific Marten, Coastal Distinct Population Segment *Martes caurina*

Proposed

<https://ecos.fws.gov/ecp/species/9081#crithab>

Western Snowy Plover *Charadrius nivosus nivosus*

Final

<https://ecos.fws.gov/ecp/species/8035#crithab>

Migratory birds

Certain birds are protected under the Migratory Bird Treaty Act¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

1. The [Migratory Birds Treaty Act](#) of 1918.
2. The [Bald and Golden Eagle Protection Act](#) of 1940.

Additional information can be found using the following links:

- Birds of Conservation Concern <http://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php>
- Measures for avoiding and minimizing impacts to birds <http://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php>
- Nationwide conservation measures for birds <http://www.fws.gov/migratorybirds/pdf/management/nationwidestandardconservationmeasures.pdf>

MIGRATORY BIRD INFORMATION IS NOT AVAILABLE AT THIS TIME

Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

[Nationwide Conservation Measures](#) describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. [Additional measures](#) or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the migratory birds potentially occurring in my specified location?

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [AKN Phenology Tool](#).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, migrating or present year-round in my project area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may refer to the following resources: [The Cornell Lab of Ornithology All About Birds Bird Guide](#), or (if you are unsuccessful in locating the bird of interest there), the [Cornell Lab of Ornithology Neotropical Birds guide](#). If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high

survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

Facilities

National Wildlife Refuge lands

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS AT THIS LOCATION.

Fish hatcheries

THERE ARE NO FISH HATCHERIES AT THIS LOCATION.

Wetlands in the National Wetlands Inventory

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

WETLAND INFORMATION IS NOT AVAILABLE AT THIS TIME

This can happen when the National Wetlands Inventory (NWI) map service is unavailable, or for very large projects that intersect many wetland areas. Try again, or visit the [NWI map](#) to view wetlands at this location.

Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tubercid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

Wild and Scenic Rivers (CEST and EA)

General requirements	Legislation	Regulation
The Wild and Scenic Rivers Act provides federal protection for certain free-flowing, wild, scenic and recreational rivers designated as components or potential components of the National Wild and Scenic Rivers System (NWSRS) from the effects of construction or development.	The Wild and Scenic Rivers Act (16 U.S.C. 1271-1287), particularly section 7(b) and (c) (16 U.S.C. 1278(b) and (c))	36 CFR Part 297
References		
https://www.hudexchange.info/environmental-review/wild-and-scenic-rivers		

1. Is your project within proximity of a NWSRS river as defined below?

Wild & Scenic Rivers: These rivers or river segments have been designated by Congress or by states (with the concurrence of the Secretary of the Interior) as wild, scenic, or recreational

Study Rivers: These rivers or river segments are being studied as a potential component of the Wild & Scenic River system.

Nationwide Rivers Inventory (NRI): The National Park Service has compiled and maintains the NRI, a register of river segments that potentially qualify as national wild, scenic, or recreational river areas

☐ No

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation used to make your determination, such as a map identifying the project site and its surrounding area or a list of rivers in your region in the Screen Summary at the conclusion of this screen.

☒ Yes, the project is in proximity of a Nationwide Rivers Inventory (NRI) River.

→ Continue to Question 2.

2. Could the project do *any* of the following?

- Have a direct and adverse effect within Wild and Scenic River Boundaries,
- Invade the area or unreasonably diminish the river outside Wild and Scenic River Boundaries, or
- Have an adverse effect on the natural, cultural, and/or recreational values of a NRI segment.

Consultation with the appropriate federal/state/local/tribal Managing Agency(s) is required, pursuant to Section 7 of the Act, to determine if the proposed project may have an adverse effect on a Wild & Scenic River or a Study River and, if so, to determine the appropriate avoidance or mitigation measures.

Note: Concurrence may be assumed if the Managing Agency does not respond within 30 days; however, you are still obligated to avoid or mitigate adverse effects on the rivers identified in the NWSRS

☒ No, the Managing Agency has concurred that the proposed project will not alter, directly, or indirectly, any of the characteristics that qualifies or potentially qualifies the river for inclusion in the NWSRS.

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation of the consultation (including the Managing Agency's concurrence) and any other documentation used to make your determination.*

☐ Yes, the Managing Agency was consulted and the proposed project may alter, directly, or indirectly, any of the characteristics that qualifies or potentially qualifies the river for inclusion in the NWSRS.

→ *Continue to Question 3.*

- 3. For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the proposed measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.**

→ *Continue to the Worksheet Summary below. Provide documentation of the consultation (including the Managing Agency's concurrence) and any other documentation used to make your determination.*

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

The Cow Creek, Smith River, Umpqua and South Umpqua Rivers, and Wessen Creek are listed on the National Rivers Inventory (NRI), however, this project only allows minor rehabilitation, and the HR Policies and Procedures do not permit conversion of land use, major rehabilitation, or acquisition of undeveloped land, landscaping, or hazardous tree removal within riparian zones. Based on this and our policies, the program is found to be in compliance with this authority. See Attachment 3 of the Policies and Procedures.

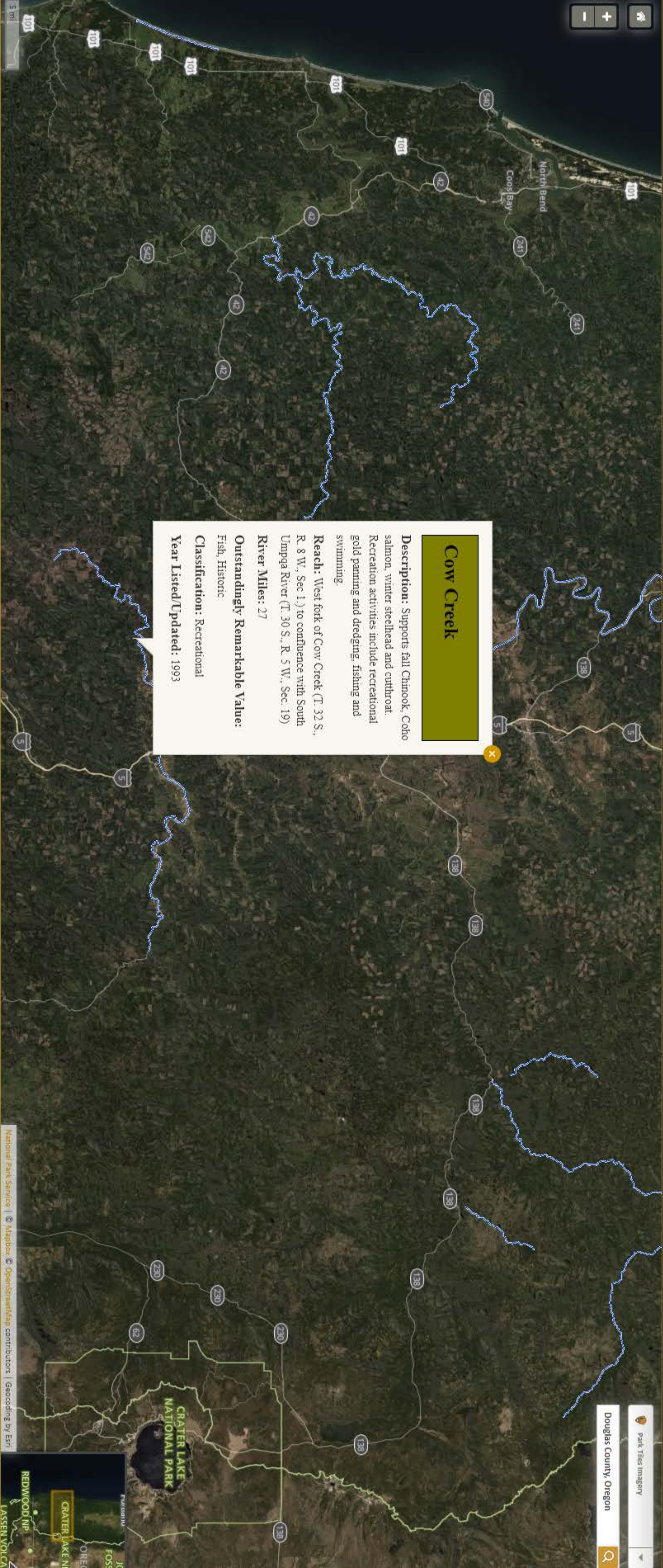
Are formal compliance steps or mitigation required?

☐ Yes

☒ No

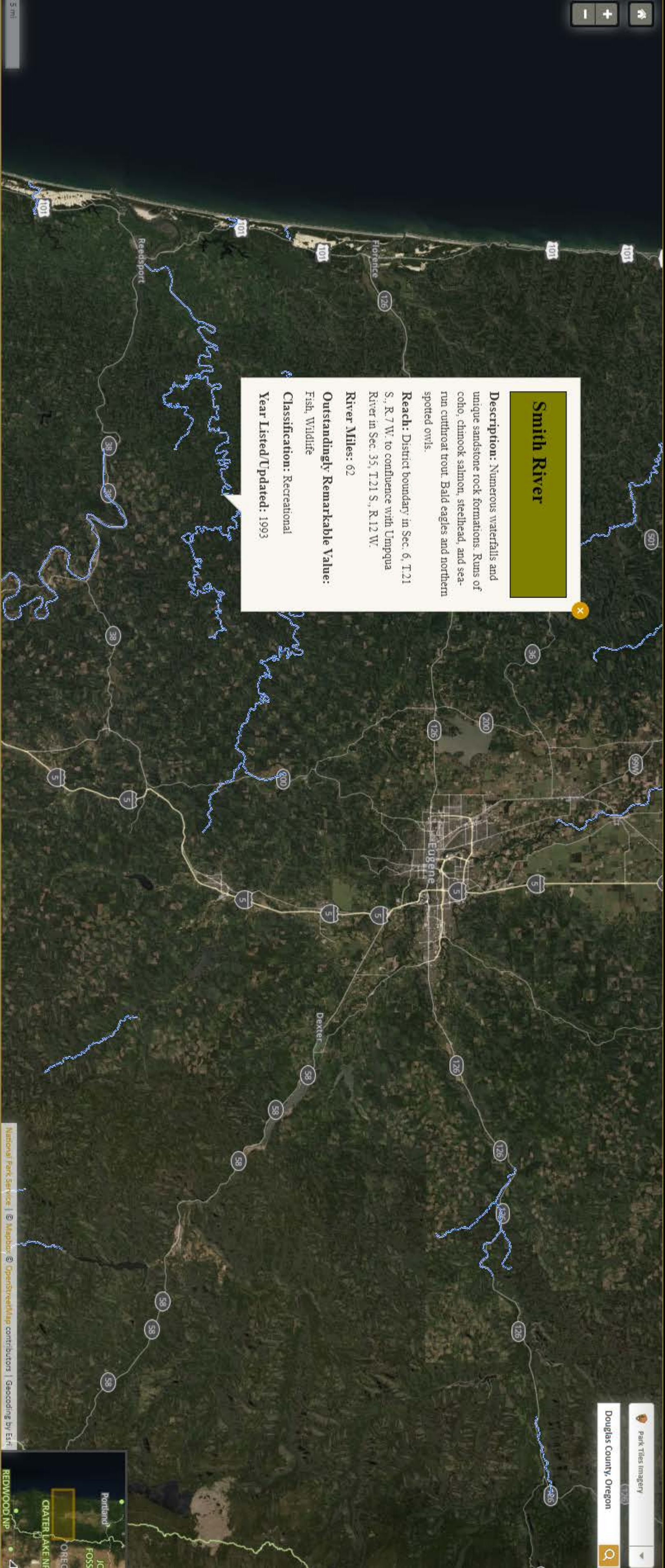
Nationwide Rivers Inventory

This is a listing of more than 3,200 free-flowing river segments in the U.S. that are believed to possess one or more "outstandingly remarkable" values.



Nationwide Rivers Inventory

This is a listing of more than 3,200 free-flowing river segments in the U.S. that are believed to possess one or more "outstandingly remarkable" values.



Smith River

Description: Numerous waterfalls and unique sandstone rock formations. Runs of coho, chinook salmon, steelhead, and sea-run cutthroat trout. Bald eagles and northern spotted owls.

Reach: District boundary in Sec. 6, T.21 S., R. 7 W. to confluence with Umpqua River in Sec. 35, T.21 S., R. 12 W.

River Miles: 62

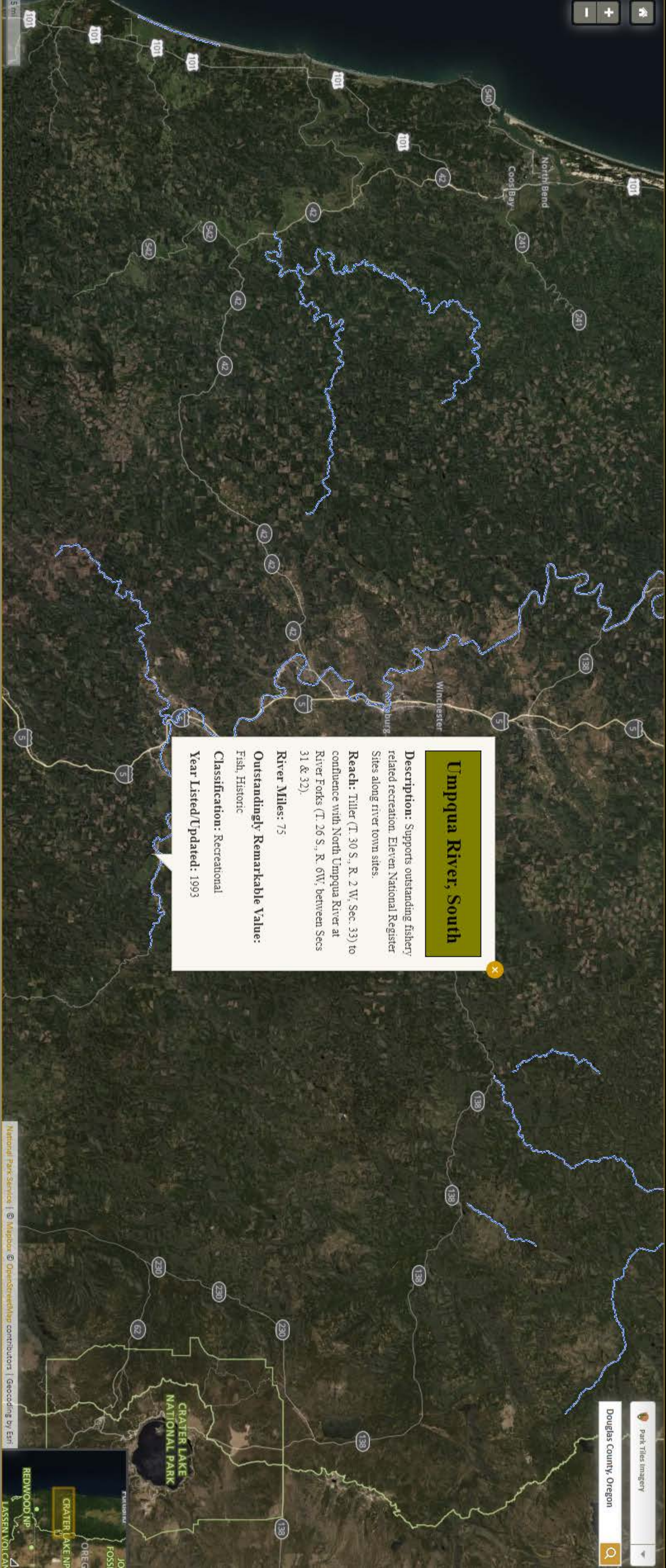
Outstandingly Remarkable Value:
Fish, Wildlife

Classification: Recreational
Year Listed/Updated: 1993



Nationwide Rivers Inventory

This is a listing of more than 3,200 free-flowing river segments in the U.S. that are believed to possess one or more "outstandingly remarkable" values.



Umpqua River, South

Description: Supports outstanding fishery related recreation. Eleven National Register Sites along river town sites.

Reach: Tiller (T. 30 S., R. 2 W, Sec. 33) to confluence with North Umpqua River at River Forks (T. 26 S., R. 6W, between Secs 31 & 32).

River Miles: 75

Outstandingly Remarkable Value:
Fish, Historic

Classification: Recreational
Year Listed/Updated: 1993

Nationwide Rivers Inventory

This is a listing of more than 3,200 free-flowing river segments in the U.S. that are believed to possess one or more "outstandingly remarkable" values.



National Park Service
U.S. Department of the Interior



Park Tiles Imagery

Douglas County, Oregon



Umpqua River

Description: Supports outstanding anadromous and warm water fishery values. Osprey and eagle wildlife viewing opportunities.

Reach: Confluence with North Umpqua River at River Forks (T. 26 S., R. 6 W., between Secs 31 & 32) to Elkton (T. 22 S., R. 7 W., Sec. 19).

River Miles: 64

Outstandingly Remarkable Value:
Fish, Historic, Recreational, Scenic

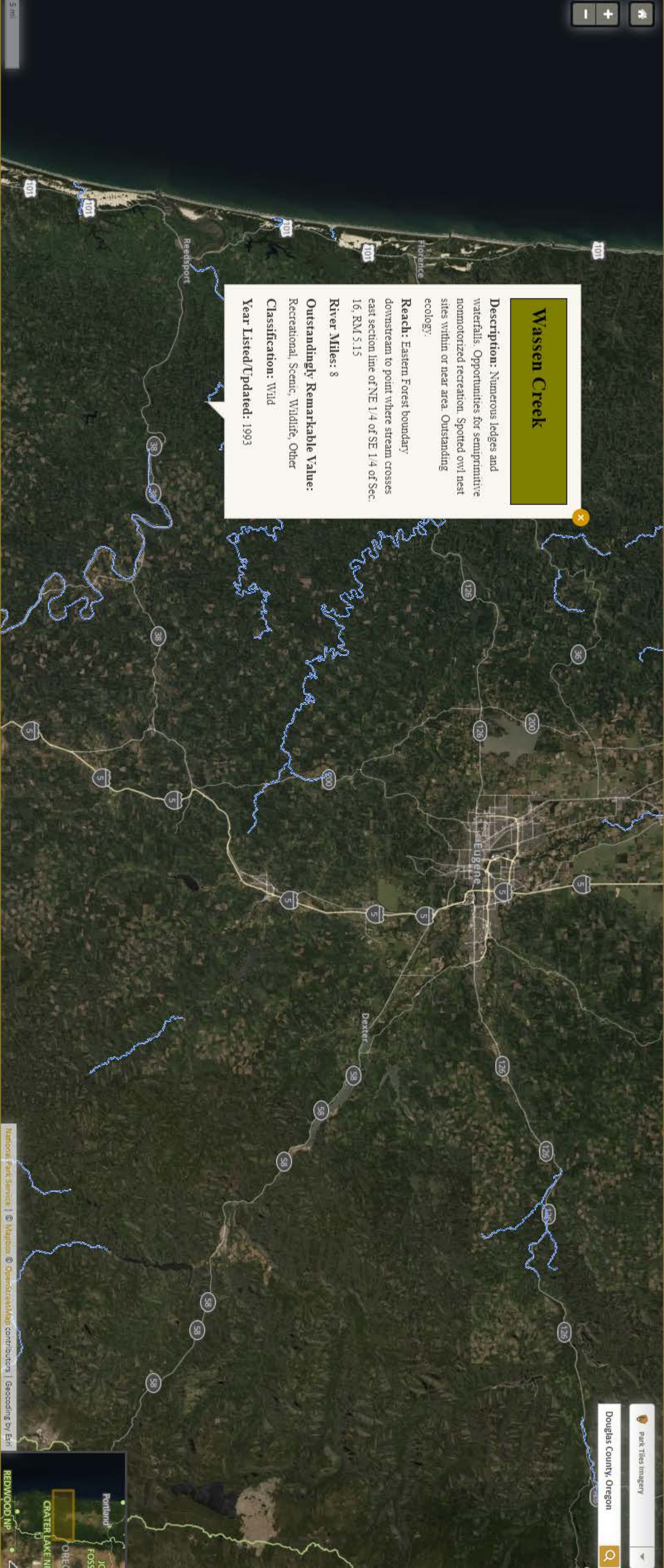
Classification: Recreational

Year Listed/Updated: 1982/ 1993



Nationwide Rivers Inventory

This is a listing of more than 3,200 free-flowing river segments in the U.S. that are believed to possess one or more "outstandingly remarkable" values.



Wassen Creek

Description: Numerous ledges and waterfalls. Opportunities for semiprimitive nonmotorized recreation. Spotted owl nest sites within or near area. Outstanding ecology.

Reach: Eastern Forest boundary downstream to point where stream crosses east section line of NE 1/4 of SE 1/4 of Sec. 16, R.M. 5.15

River Miles: 8

Outstandingly Remarkable Value: Recreational, Scenic, Wildlife, Other

Classification: Wild

Year Listed/Updated: 1993



Air Quality (CEST and EA)

General Requirements	Legislation	Regulation
The Clean Air Act is administered by the U.S. Environmental Protection Agency (EPA), which sets national standards on ambient pollutants. In addition, the Clean Air Act is administered by States, which must develop State Implementation Plans (SIPs) to regulate their state air quality. Projects funded by HUD must demonstrate that they conform to the appropriate SIP.	Clean Air Act (42 USC 7401 et seq.) as amended particularly Section 176(c) and (d) (42 USC 7506(c) and (d))	40 CFR Parts 6, 51 and 93
Reference		
https://www.hudexchange.info/environmental-review/air-quality		

Scope of Work

1. Does your project include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units?

☐ Yes

→ Continue to Question 2.

☒ No

Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.

Air Quality Attainment Status of Project's County or Air Quality Management District

2. Is your project's air quality management district or county in non-attainment or maintenance status for any criteria pollutants?

Follow the link below to determine compliance status of project county or air quality management district:

<http://www.epa.gov/oaqps001/greenbk/>

☐ No, project's county or air quality management district is in attainment status for all criteria pollutants

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.

☐ Yes, project's management district or county is in non-attainment or maintenance status for one or more criteria pollutants.

Describe the findings:

→ Continue to Question 3.

3. Determine the estimated emissions levels of your project for each of those criteria pollutants that are in non-attainment or maintenance status on your project area. Will your project exceed any of the *de minimis* or *threshold* emissions levels of non-attainment and maintenance level pollutants or exceed the screening levels established by the state or air quality management district?

☐ No, the project will not exceed *de minimis* or threshold emissions levels or screening levels

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Explain how you determined that the project would not exceed *de minimis* or threshold emissions.

☐ Yes, the project exceeds *de minimis* emissions levels or screening levels.

→ Continue to Question 4. Explain how you determined that the project would not exceed *de minimis* or threshold emissions in the Worksheet Summary.

4. For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

There are no non-attainment areas that overlap the project area. Further, the housing rehabilitation program policies and procedures prohibit new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units. See Air Quality Worksheet and Attachment 3 of the Policies and Procedures.

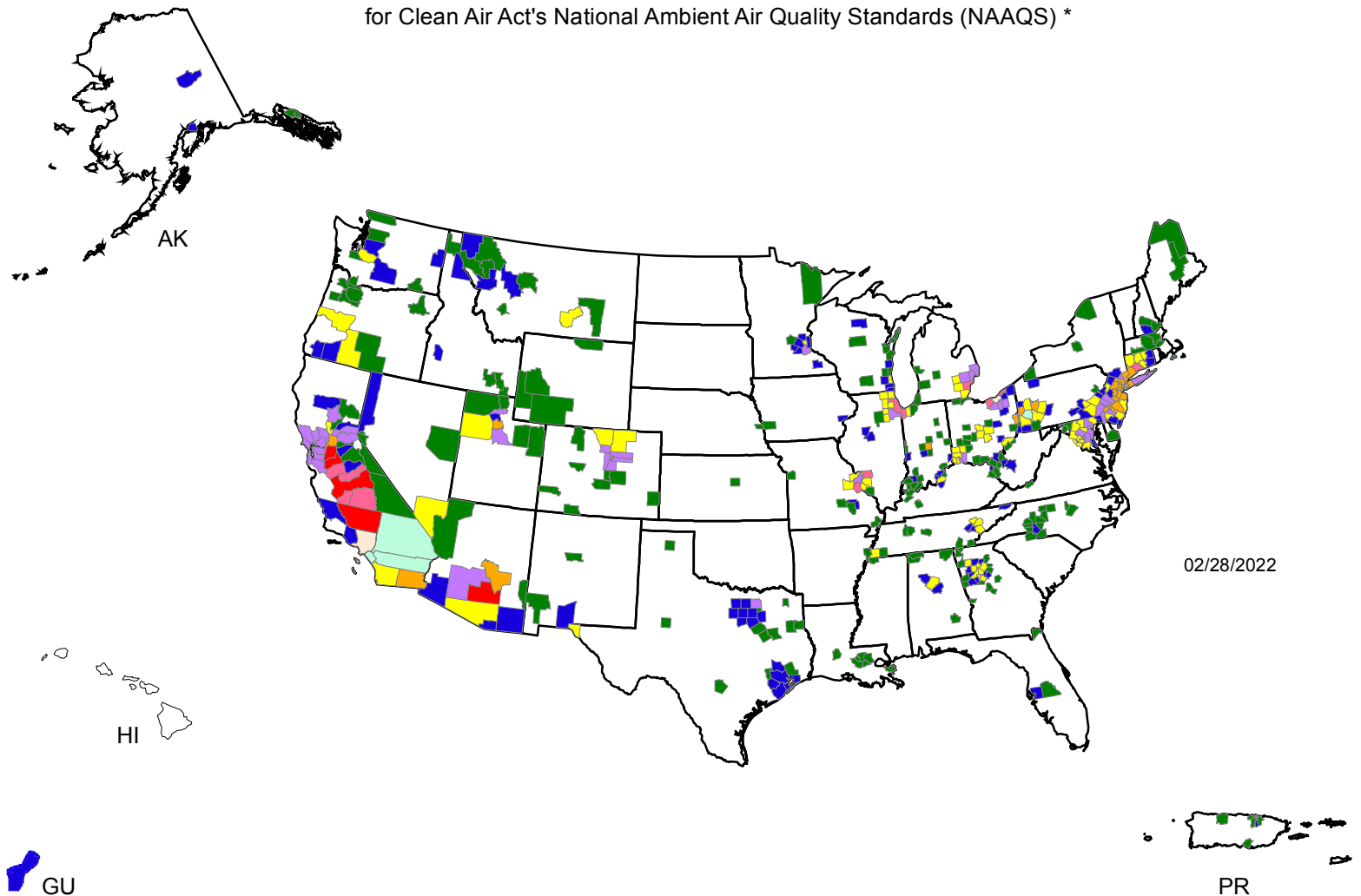
Are formal compliance steps or mitigation required?

☐ Yes

☒ No

Counties Designated "Nonattainment" or "Maintenance"

for Clean Air Act's National Ambient Air Quality Standards (NAAQS) *

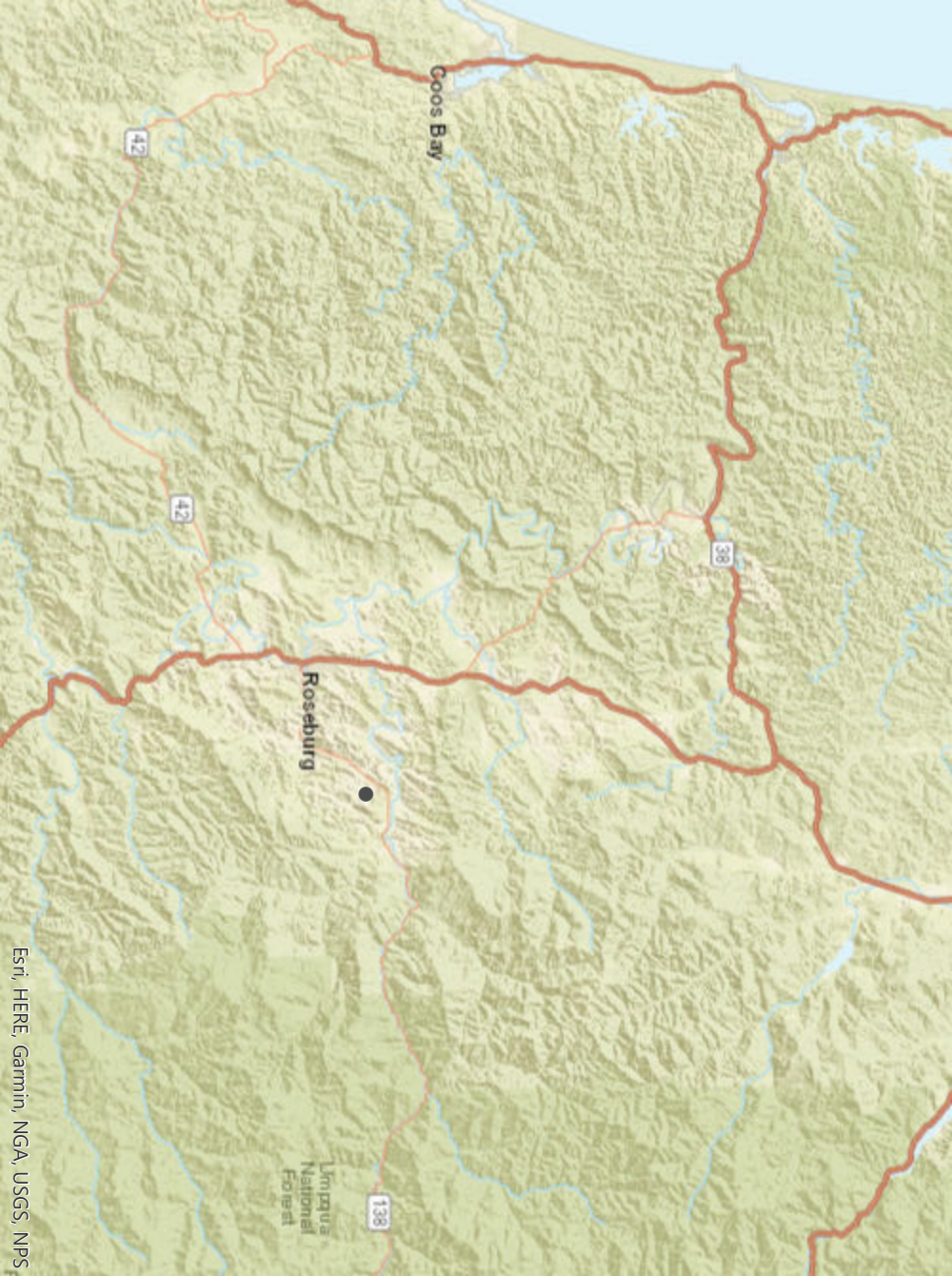


Legend **

- County Designated Nonattainment or Maintenance for 9 NAAQS Pollutants
- County Designated Nonattainment or Maintenance for 8 NAAQS Pollutants
- County Designated Nonattainment or Maintenance for 7 NAAQS Pollutants
- County Designated Nonattainment or Maintenance for 6 NAAQS Pollutants
- County Designated Nonattainment or Maintenance for 5 NAAQS Pollutants
- County Designated Nonattainment or Maintenance for 4 NAAQS Pollutants
- County Designated Nonattainment or Maintenance for 3 NAAQS Pollutants
- County Designated Nonattainment or Maintenance for 2 NAAQS Pollutants
- County Designated Nonattainment or Maintenance for 1 NAAQS Pollutants

* The National Ambient Air Quality Standards (NAAQS) are health standards for Carbon Monoxide, Lead (1978 and 2008), Nitrogen Dioxide, 8-hour Ozone (2008), Particulate Matter (PM-10 and PM-2.5 (1997, 2006 and 2012), and Sulfur Dioxide.(1971 and 2010)

** Included in the counts are counties designated for NAAQS and revised NAAQS pollutants. Revoked 1-hour (1979) and 8-hour Ozone (1997) are excluded. Partial counties, those with part of the county designated nonattainment and part attainment, are shown as full counties on the map.



Coos Bay

42

45

38

Roseburg

138

Umpqua
National
Forest

Farmlands Protection (CEST and EA)

General requirements	Legislation	Regulation
The Farmland Protection Policy Act (FPPA) discourages federal activities that would convert farmland to nonagricultural purposes.	Farmland Protection Policy Act of 1981 (7 U.S.C. 4201 et seq.)	7 CFR Part 658
Reference		
https://www.hudexchange.info/environmental-review/farmlands-protection		

1. Does your project include any activities, including new construction, acquisition of undeveloped land or conversion, that could convert agricultural land to a non-agricultural use?

☐ Yes → Continue to Question 2.

☒ No

Explain how you determined that agricultural land would not be converted:

Conversion of farmland to non-agricultural uses is not an eligible activity for assistance under this project. Further, the project is limited to minor rehabilitation of existing single-family owner-occupied homes. The project is found to be in compliance with this authority. See Project Description and Attachment 3 of the Policies and Procedures.

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documentation supporting your determination.

2. Does “important farmland,” including prime farmland, unique farmland, or farmland of statewide or local importance regulated under the Farmland Protection Policy Act, occur on the project site?

You may use the links below to determine important farmland occurs on the project site:

- Utilize USDA Natural Resources Conservation Service’s (NRCS) Web Soil Survey <http://websoilsurvey.nrcs.usda.gov/app/HomePage.htm>
- Check with your city or county’s planning department and ask them to document if the project is on land regulated by the FPPA (zoning important farmland as non-agricultural does not exempt it from FPPA requirements)
- Contact NRCS at the local USDA service center <http://offices.sc.egov.usda.gov/locator/app?agency=nrcs> or your NRCS state soil scientist http://soils.usda.gov/contact/state_offices/ for assistance

☐ No → Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.

☐ Yes → Continue to Question 3.

3. Consider alternatives to completing the project on important farmland and means of avoiding impacts to important farmland.

- Complete form **AD-1006**, "Farmland Conversion Impact Rating" http://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb1045394.pdf and contact the state soil scientist before sending it to the local NRCS District Conservationist.
(NOTE: for corridor type projects, use instead form **NRCS-CPA-106**, "Farmland Conversion Impact Rating for Corridor Type Projects: http://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb1045395.pdf.)
- Work with NRCS to minimize the impact of the project on the protected farmland. When you have finished with your analysis, return a copy of form AD-1006 (or form NRCS-CPA-106 if applicable) to the USDA-NRCS State Soil Scientist or his/her designee informing them of your determination.

Document your conclusion:

☐ Project will proceed with mitigation.

Explain in detail the proposed measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide form AD-1006 and all other documents used to make your determination.*

☐ Project will proceed without mitigation.

Explain why mitigation will not be made here:

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide form AD-1006 and all other documents used to make your determination.*

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

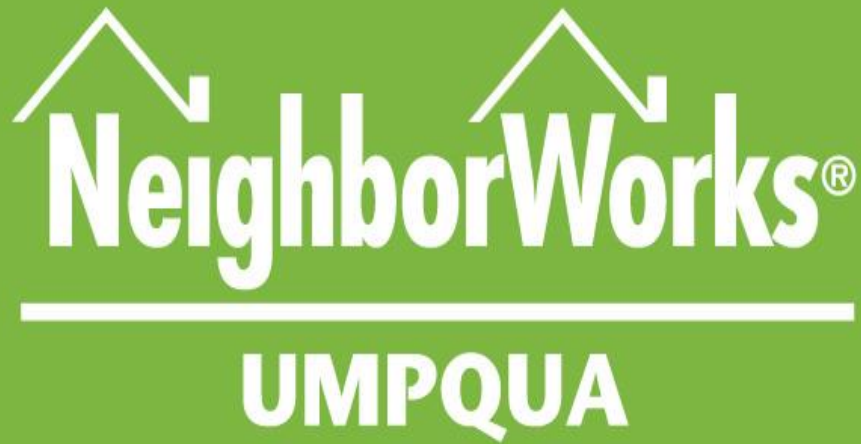
- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

Conversion of farmland to non-agricultural uses is not an eligible activity for assistance under this project. Further, the project is limited to minor rehabilitation of existing single-family owner-occupied homes. The project is found to be in compliance with this authority. See Project Description and Attachment 3 of the Policies and Procedures.

Are formal compliance steps or mitigation required?

☐ Yes

☒ No



Housing | Finance | Community

Housing Rehab Policy and Procedure Manual

Adopted September 2020

This manual is intended for employees of NeighborWorks Umpqua and describes the procedures that are performed in the day-to-day operations of the Home Repair Programs. This manual supersedes any and all previous policies and procedures relating the Home Repair Program.

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INTRODUCTION

Umpqua Community Development Corporation dba NeighborWorks Umpqua (NWU) is a non-profit community development corporation that was established in 1991. NWU operates a Home Repair Program. The program provides assistance in the form of grants and loans for low to moderate income homeowners to make necessary repairs to their existing homes. Our service area is Southern Oregon, including Douglas, Coos, and Curry Counties, and specific target areas within the region. The program is funded by Oregon Community Development Block Grants (CDBG) and a Revolving Loan Fund deriving from the repayments of previous loans and revolved, de-federalized CDBG awards. The goals of the program are:

1. To alleviate conditions which endanger the residents' health and safety, to eliminate substandard living conditions, and to correct structural deficiencies in homes.
2. To encourage weatherization to conserve energy and other resources.
3. To focus on the housing needs of the low and moderate-income citizens of our communities, including the elderly, the disabled, and single heads of households.

4. To assist in and encourage the maintenance and preservation of the architectural integrity of existing homes in the communities.
5. To encourage neighborhood revitalization while allowing residents to remain in their homes.

In keeping with the intent of the overall program, the first priority of this program shall be the elimination of health and safety hazards and substandard living conditions in participants' homes.

SECTION I: APPLICANT ELIGIBILITY

All homeowners located in eligible areas may apply. Applicants will be rated according to policy preferences (see Attachment 1). For the purposes of this subsection, "Applicant" is the person(s) who owns the property. "Applicant Household" includes other persons sharing residency whose income and resources are available to meet the household's needs and who are either related by blood, marriage or operation of law, or who evidence a stable family relationship for the six months prior to signing the application. Children to be included must occupy the residence a minimum of 51% of the time to be counted as a household member.

To be eligible for Home Repair Program assistance, an applicant must meet all the following requirements:

- A. **Residency:** The applicant must own the land and dwelling to be rehabilitated. In the case of a manufactured home located in and leasing a space in a manufactured home community, the applicant must own the dwelling (grant assistance only). The applicant must have occupied the dwelling as their primary residence for the past six months. Exceptions to this definition of property would be made in accordance with the conditions of Community Development Block Grant awards.
- B. **Property:** The property must be a single-family home or duplex dwelling with the owner occupying a minimum of 50% of living space to be rehabilitated and located within Douglas, Coos, Curry counties and/or specifically targeted areas. Exceptions to this definition of property would be made in accordance with the conditions of Community Development Block Grant awards.
- C. **Income:** Annual gross income of the applicant household must not exceed 80% of county median income limits established by HUD in effect at the time of application submission.
 - a. Current HUD guidelines are used to determine countable income. Total gross income includes, but is not limited to, the following:
 - i. Income from wages, salaries, tips, etc. The full amount, before payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation for personal services.
 - ii. The net income from the operation of a business or profession. Expenditures for business expansion or amortization of capital indebtedness shall not be used as deductions in determining net income. An allowance for depreciation of assets used in a business or profession may be deducted, based on straight-line depreciation, as provided in Internal Revenue Service regulations. Any withdrawal of cash or assets from the operation of a business or profession will

be included in income, except to the extent the withdrawal is reimbursement of cash or assets invested in the operation by the family.

- iii. Interest, dividends, and other net income of any kind from real or personal property. Expenditures for amortization of capital indebtedness shall not be used as deductions in determining net income. An allowance for depreciation is permitted only as authorized in b (above). Any withdrawal of cash or assets from an investment will be included in income, except to the extent the withdrawal is reimbursement of cash or assets invested by the family.
- iv. The full amount received from Social Security, annuities, insurance policies, retirement funds, pensions, disability, or death benefits.
- v. Payments in lieu of earnings, such as unemployment and disability compensation, worker's compensation, and severance pay.
- vi. Welfare assistance payments made under the Temporary Assistance for Needy Families (TANF) program.
- vii. Alimony, child support payments, and regular contributions or gifts received from organizations or persons not residing in the dwelling.
- viii. All regular pay, special pay, and allowances of a member of the Armed Forces (except as provided in h. below).
- ix. Other income defined in 24 CFR Part 5.

b. Annual income does not include the following:

- i. Income from employment of children (including foster children) under the age of 18 years.
- ii. Payments received for the care of foster children or adults.
- iii. Lump-sum additions to family assets, such as inheritances, insurance payments (including payments under health and accident insurance and worker's compensation), capital gains and settlement for personal or property losses.
- iv. Amounts received by the family, that are specifically for, or in reimbursement of, the cost of medical expenses for any family member.
- v. Income of a live-in aide.
- vi. Certain increases in income of a disabled member of qualified families residing in HOME-assisted housing or receiving HOME tenant-based rental assistance.
- vii. The full amount of student financial assistance paid directly to the student or to the educational institution.
- viii. The special pay to a family member serving in the Armed Forces who is exposed to hostile fire.
- ix. Amounts received by persons participating in Self Sufficiency Programs as defined in 24 CFR 5.609.
- x. Temporary, nonrecurring, or sporadic income (including gifts).
- xi. Reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era.
- xii. Earnings of full-time students 18 years old or older (excluding the head of household or spouse).

- xiii. Adoption assistance payments.
 - xiv. Deferred periodic amounts from SSI and Social Security benefits that are received in a lump sum amount or in prospective monthly amounts.
 - xv. Amounts received by the family in the form of refunds or rebates under state or local law for property taxes paid on the dwelling unit.
 - xvi. Amounts paid by a state agency to a family with a member who has a developmental disability and is living at home to offset the cost of services.
 - c. Amounts specifically excluded by any other federal statute from consideration as income for purposes of determining eligibility or benefits under a category of assistance programs that includes assistance under any program to which the exclusions of 24 CFR 5.609 (c) apply.
 - d. To determine the applicant household income for eligibility purposes, HUD guidelines for determining income and allowances will be used and reported income information will be verified by one of the following methods
 - i. Applicants with full time employment will have income computed from the three months prior to the date of application, annualized year to date earnings, or their latest federal tax returns.
 - ii. Applicants receiving Social Security, SSI, Welfare, Pensions, Unemployment etc. will have their income computed from their most recent benefit letter or latest federal tax returns.
 - iii. Applicants with temporary, part-time or seasonal occupations will have their income computed from their latest federal tax returns or from the twelve months prior to the date of application.
 - iv. Applicants with self-employment income will have income computed from their latest federal tax returns or most recent quarterly income statement.
 - v. Income will be verified by one of the following methods:
 - 1. Third party written.
 - 2. Third party oral.
 - 3. Computer generated reports.
 - 4. Review of documents.
 - 5. Self- certification or declaration
- D. **Net Worth:** Excluded from the assets and liabilities used in the "net worth" calculation are the applicant(s) home, one automobile (plus additional automobiles if needed for additional adult employment transportation) and household furnishings. In order to qualify for a rehabilitation loan, the applicant must meet the "net worth" requirements below:
- a. If the head of the household is under the age of 62, the net worth must be less than \$25,000.00.
 - b. If the head of the household is 62 years of age or older or disabled as defined by the Social Security Act or the Developmental Disabilities Assistance and Bill of Rights Act, the net worth must be less \$50,000.00.
 - c. Assets included in net worth calculations are:

- i. Cash held in savings accounts, checking accounts, safe deposit boxes, homes, etc. For these accounts the most recent statement balance will be used.
 - ii. Cash value of revocable trusts available to the applicant.
 - iii. Equity in rental property or other capital investments. Equity is the estimated current market value of the asset less the unpaid balance on all loans secured by the asset and all reasonable costs (i.e. broker fees) that would be incurred in selling the asset.
 - iv. Cash value of stocks, bonds, Treasury bills, certificates of deposit and money market accounts.
 - v. Individual retirement and Keogh accounts (even though withdrawal would result in a penalty).
 - vi. Retirement and pension funds.
 - vii. Cash value of life insurance policies available to the individual before death (e.g. surrender value of a whole life or universal life policy).
 - viii. Personal property held as an investment such as gems, jewelry, coin collections, antique cars, etc.
 - ix. Lump sum or one-time receipts, such as inheritances, capital gains, lottery winnings, victim's restitution, insurance settlements and other amounts not intended as periodic payments.
 - x. Mortgages or deed of trust held by an applicant.
- d. Assets not included in net worth calculations are:
 - i. Necessary personal property, except as noted in h. of assets included, such as clothing, furniture, cars, and vehicles specially equipped for persons with disabilities.
 - ii. Interest in Indian trust lands.
 - iii. Assets not effectively owned by the applicant. That is, when assets are held in an individual's name, but the assets and any income they accrue to the benefit of someone else who is not a member of the household and that other person is responsible for income taxed incurred on income generated by the asset.
 - iv. Equity in cooperatives in which the family lives.
 - v. Assets not accessible to and that provide no income for the applicant.
 - vi. Term life insurance policies (i.e., where there is no cash value).
 - vii. Assets that are part of an active business. "Business" does not include rental of properties that are held as an investment and not a main occupation.
- e. Applicant(s) with a net worth that exceeds the limits in Section I, D:1 and Section I, D:2 must be approved by NWU and if CDBG funded, by Oregon Business Development Department (OBDD). Some of the factors that will be considered are:
 - i. Income Levels.
 - ii. The age and health of the applicant(s) and applicant(s) who are elderly and/or are disabled.

- iii. The amount that the applicant(s) will contribute toward the rehabilitation. NWU may require the applicant(s) to contribute a specific amount of funds for the rehabilitation work as a condition for receiving rehabilitation assistance.
- iv. The need for repair.
- v. Any unusual circumstances of the applicant(s).
- vi. The property on which the home is located is excluded from the net worth calculation. The parcel can include more than one lot as long as the lots are adjacent to the lot on which the house is located and were purchased at the time when the home was purchased.

SECTION II: HOME REPAIR PROGRAM REQUIREMENTS

NWU's Home Repair Program provides two types of assistance. 1) Grants to homeowners, and 2) loans to homeowners. The type of assistance available is based on funding availability and made in accordance with the conditions of Community Development Block Grant awards.

GENERAL PROGRAM CONDITIONS

- A. **Eligible Rehabilitation Costs:** Grant or Loan funds may be used to finance the cost of rehabilitation work deemed necessary to bring the property into compliance with applicable codes and ordinances, to return the property to its original condition and to meet the objectives of the program. The minimum standard will be the HUD Section 8 Housing Quality Standard (HQS). The preferred standard will be total rehabilitation of the home.
 - a. Guidelines used to prioritize the expenditures of assistance funds include:
 - i. Conditions, which endanger the health, safety, property, or welfare of the occupants.
 - ii. Work, which should be done to prevent deterioration and preserve the structure.
 - iii. Conservation of energy, improve weatherization, restore, or maintain architectural integrity, or decrease maintenance and/or operating expenses.
 - iv. General improvements to the property which are usually classified as remodeling, redecorating, or upgrading of the structure.
 - b. Additional rehabilitation costs may also include:
 - i. Removal of architectural barriers to meet special needs.
 - ii. Recording, title insurance, appraisals, asbestos and lead based paint inspections and surveys, dry rot inspection, architectural fees, and other miscellaneous fees.
- B. **Ineligible Rehabilitation Costs:** Funds may not be used to finance:
 - a. Substantial or major rehabilitation exceeding 50% of the market value of the home.
 - i. The 50% limit of market value may be waived only when providing grant assistance to manufactured homes on leased land.
 - b. Any work on non-owner-occupied homes.
 - c. New construction, expansion, or finishing of unfinished spaces, such as attics or basements.

- d. Materials, fixtures, or equipment of a type or quality, which exceeds costs that are customarily spent on properties of the same general type or value as the property being rehabilitated.
 - e. Appliances and furnishings, with the exception of water heaters.
 - f. The applicant's labor or the labor of a household member.
 - g. If CDBG funded, the alteration or expansion of the footprint of any existing structure located in a wetland, floodplain, riparian zone, Wild and Scenic River area, or converting farmland to non-agricultural purposes, with no exceptions.
 - h. Increasing the amount of impervious surfaces or increasing post construction run off.
 - i. Landscaping and hazardous tree removal.
 - j. If CDBG funded, acquisition of existing housing or land for development with no exceptions.
 - k. If CDBG funded, any work on structures located in an Airport Clear Zone/Accident Potential Zone, with no exceptions.
- C. **Ineligible Structures:** The existence of the following conditions could disqualify a structure for a Home Repair Program assistance:
- a. The structure has deteriorated to the extent where rehabilitation is not economically feasible.
 - b. The structure and/or use is in substantial nonconformity with the zoning regulations and/or the comprehensive land use plan of the city or county in which it is located.
 - c. Significant code violations exist which would be extremely difficult and/or economically unfeasible to correct.
 - d. The proposed expenditure would not increase the value of the property sufficiently to protect the owner's existing equity.
 - e. The cost of the repairs required to bring the dwelling up to minimum property standards will exceed the program's loan limit.
 - f. The applicant does not own the land on which the structure is located, except for grants to owners of manufactured homes on leased land in manufactured home communities
 - g. The property is located outside of a specifically targeted area.
 - h. The unit is not a single-family residence or duplex with at least 50% occupied by the owner.
- D. **Environmental Conditions:** When Community Development Block Grant funds are used to provide assistance to homeowners, certain federal environmental rules and regulations apply to ensure funds federal funds are used in compliance with the National Environmental Protection Act. These conditions are outlined in Attachment 3.

SECTION II.A: HOME REPAIR GRANTS

If funds become available to assist homeowners with grants the following policies and eligibility criteria will apply:

- A. **Applicant Eligibility:** The applicant must meet the general Home Repair Program income and net worth requirements and be otherwise ineligible for conventional financing.

- B. **Eligible Properties:** The subject property must meet all the general property and residency requirements of the Home Repair Program with exception of being a single-family home or duplex. Grant funds can be used to assist eligible homeowners residing in manufactured home parks, condominiums, or townhomes. Grant funds cannot be used for travel trailers or other transportable or temporary forms of shelter.
- C. **Allowable Repairs:** Grant funds will only be used to repair emergency or health and safety concerns that currently make the home unsafe or uninhabitable for the applicants or members of the applicant's household or will likely make it so in the next twelve months.
 - a. Grant funds can only be used on the portions of a structure that are owned and occupied by the applicant and are not co-owned. For example, funds cannot be used to make repairs to the roof of an un-partitioned duplex, condominium, or townhome.
- D. **Grant Amounts:** Grant amounts will equal the actual cost of repairs and will not exceed \$15,000.00.
- E. **Conditions of Funding Awards:** Any special conditions of a grant, funding, or award will apply and supersede any conflicting eligibility criteria or policies contained herein.
- F. All other program policies and procedures contained in this manual will apply.

SECTION II.B: HOME REPAIR LOANS

If funds are available, NWU will offer home repair loans. Loans to households with incomes below the HUD low income limits (80% AMI) and or funded by CDBG will be deferred, no-interest loans that are subject to annual reviews and conversion to an interest-bearing installment loan. Loans to moderate-income households will be interest bearing installment loans that are subject to interest rate changes. All loans are due upon the sale or any transfer of ownership by the last surviving borrower, or when the property is no longer the primary residence of the borrower. Applicants will be encouraged to use other private or public resources when possible to provide additional rehabilitation assistance.

- A. **Loan Amounts:**
 - a. Loans are provided in amounts up to \$25,000, or in accordance with CDBG requirements if CDBG funded, with a minimum loan amount of \$5,000. Any loans greater than \$15,000.00 need to be approved by OBDD if CDBG funded. The loan amount will be the actual cost of the approved home repair work, loan fees, any inspections, and usual and customary closing costs, or the \$25,000 maximum loan amount, whichever is less.
 - b. More specific terms and conditions will be outlined in the Trust Deed, Promissory Note, and Truth in Lending Statement.
 - c. Loans or grants funded with Community Development Block Grant Funds will not exceed 50% of the market value of the structure before rehabilitation with no exceptions.

- d. Loan to be 90% of the applicant's equity in subject property as determined by subtracting all liens and/or judgments of record from the value of the home. The value of the home shall be determined using one of the following options:
 - i. The Real Market Value (RMV) as determined by the county tax office for the most recent tax year.
 - ii. A Market Analysis completed by a Certified Realtor within the last three months.
 - iii. An Appraisal completed by a Certified Appraiser within the last twelve months.
 - e. Loans that exceed the limits allowed in this Section must be approved by the Loan Committee. Some of the factors that will be considered are:
 - i. The need for or completion of approved repairs.
 - ii. Whether the total number of homes to be rehabilitated in the Grantee's application is likely to be achieved.
 - iii. Loans that exceed the limits of this Section must be approved by the Loan Exception Committee. Some of the factors that will be considered are:
 - 1. The need for or completion of approved repairs to eliminate substandard conditions.
 - 2. The applicant(s) ability to finance some of the rehabilitation work.
 - 3. The amount that the requested loan exceeds the limit allowed in Section II, A:3. Approved items would include health, safety, and structural deficiencies.
- B. **Consent from Holders of Prior Financing:** Written consent from all holders of prior financing with recorded liens must be secured prior to loan closing if required under prior financing agreements. Prior financing includes, but is not limited to, prior mortgages, trust deeds, land sales contracts, and life estates.
- C. **Prior Financing Provisions:** The existence of the following prior financing conditions will disqualify an applicant for a Home Repair Program loan:
 - a. A loan containing balloon payment provisions unless approved by NWU. Some of the factors that will be considered are:
 - i. The amount of the balloon payment.
 - ii. An assessment of the applicants' ability to refinance or pay the balloon payment.
 - iii. The present equity and projected equity when the balloon payment is due.
- D. **Judgments/Federal Tax Liens:** Judgments in excess of \$5,000 at the time of application will disqualify the property for a Home Repair Loan. All Federal tax liens must be satisfied prior to loan closing.
- E. **Property Taxes:** Real property taxes that are due and payable beyond the current and immediate past year at the date of loan closing must be paid before loan closing.

- F. **Homeowner/Fire/Flood Insurance:** Applicants are required to have insurance equal to the amount of existing liens and the rehabilitation lien at the time of loan closing and to maintain the insurance during the term of the loan. All premiums for insurance coverage that are due and payable at the date of loan closing must be paid before loan closing. If CDBG funded, homeowners must have flood insurance if the property is in a flood plain.
- G. **Exception:** Home is uninsurable at time of closing but will be insurable when work is completed. If the project is CDBG funded approval must be obtained by OBDD.
- H. **Foreclosure:** Applicants who have received a Notice of Default will be ineligible until the default has been remedied.

SECTION III: APPLICATION PROCESSING

- A. **Application Verification:** All verification documentation, except consent(s) from holder(s) of prior financing, used to determine eligibility must be re-established every six months until the grant or loan is closed.
- B. **Property Inspection:** All dwellings must be inspected by the NWU Rehabilitation Specialist to determine needed repairs and improvements. CDBG funded homes require HQS inspections. Input and participation by the homeowner are necessary to identify needed repairs and improvements. All structures built prior to January 1, 2004 must be surveyed for Asbestos Containing Materials prior any demolition or renovation activities occurring. The survey will be performed by an accredited asbestos inspector and kept on site during repair work. Homeowners may use their Home Repair Program assistance to pay for these inspections.
- C. **Inspection Report/Bid Form:** After the Property Inspection, a Work Write-Up will be prepared based on the Property Inspection that describes the conditions of the house and recommended corrections. The homeowner agrees to carry out the repairs described in the Work Write-Up (subject to approved changes.) Contractors interested in submitting bids for rehabilitation projects must use the Inspection Report/Bid Form as a guide for their proposal and cost estimate.
- D. **Procurement of Bids:** It is the responsibility of the homeowner to contact a minimum of three potential contractors and attempt to procure three bids and a minimum of one acceptable bid for the rehabilitation work. The Home Repair Department may procure bids for the homeowner under special circumstances with the applicants' permission. The homeowner will always select the contractor.
- E. **Loan and Grant Approval:** All loans and grants will be approved by NWU. Applicants approved for a home repair loan or grant will be notified in writing. Applications will be approved in the order they are completed.

- F. **Other Rehabilitation Assistance:** Homeowners are encouraged to apply for weatherization grants through other agencies, and/or refinance and consolidate existing liens.

SECTION IV: THE CONSTRUCTION CONTRACT

The parties to the contract are the homeowner and contractor. All Construction Contracts and related documents must be on approved forms. The homeowner and the Rehabilitation Specialist must approve all Construction Contract modifications/change orders. The Rehabilitation Specialist is authorized to assist the homeowner to interpret and enforce the provisions of, and the satisfactory performance of the Construction Contract

- A. **Contractor Eligibility Requirements:** Homeowners are encouraged to hire local contractors whenever possible. The Home Repair Program staff, namely the Rehabilitation Specialist, is responsible for ensuring that all contractors and subcontractors awarded contracts through the Home Repair Program are registered with the Construction Contractor's Board and possesses the required "active" status.

1. Contractors with a record of poor performance with prior home repair program funded projects will be removed from the contractors list provided to homeowners for a minimum of six months. Contractors may appeal the decision to have their name removed from NWU's list. Some of the factors that will be considered as evidence of poor performance are:
 - a. The quantity and severity of complaints from homeowners.
 - b. Complaints filed with the Construction Contractors Board will be documented.
 - c. Complaints will be evaluated based upon records and findings made by the Rehabilitation Staff and the Construction Contractors Board.
 - d. Homeowner complaints that are not sustained by the Rehabilitation Staff or the Construction Contractors Board will not be considered evidence of poor performance.
 - e. Failure to pay subcontractors and suppliers when payment is due.
 - f. Failure to pay a disputed claim may or may not be evidence of poor performance.
 - g. The Rehabilitation Staff will issue decisions on disputed claims in accordance with the Construction Contractors Board.
 - h. If the contractor fails to pay undisputed bills to subcontractors and suppliers when due, this may be considered evidence of unsatisfactory performance.
 - i. Failure to complete work in a timely manner. Both the frequency and the magnitude of time will be evaluated and compared with the records of other contractors participating in the program.

- B. **Homeowner/Contractor:** The homeowner may act as the general contractor for the rehabilitation work. The homeowner will be responsible for coordinating the work of the subcontractors and will be required to submit billings from subcontractors to receive payment.

At no time does the provisioning of grant or loan assistance by NWU establish or imply that NWU is the general contractor for a homeowner.

- C. **Contractor Review:** The Home Repair Program staff is responsible for ensuring that all subcontractors are registered with the Construction Contractors Board and possess the required “active” status prior to receiving contract awards.
- D. **Work Performed by Homeowner:** Homeowners may do some or all the work when they are able to do so. The homeowner and members of the homeowners’ household cannot receive any payment for their labor. The homeowner will be required to submit invoices for materials purchased and work must pass all required inspections to receive reimbursement.
- E. **Contract Completion Time:**
 - 1. **Homeowner Contract:** All work should be completed within 9 months from the date of the Notice to Proceed. The contract may be terminated by the Program Coordinator on recommendations from the Rehabilitation Specialist. A two- month extension may be approved due to weather and other reasons.
 - 2. **Contractor Contract:** All work should be completed within 90 days from the date of the Notice to Proceed. The homeowner or the contractor may terminate the contract. Completion dates of less than 90 days may be required to complete the Rehabilitation Loan Program in a timely manner. Time extensions may be approved due to weather and other reasons.
- F. **Contract Payments:** Up to 10% of the total contract amount may be requested at signing of the contract. Progress payments can be made for up to 95% of the value of acceptable work completed as determined by the Rehabilitation Specialist. Payments will be made in accordance with the Homeowner Contract/Construction Contractor Contract. Before final payment can be authorized:
 - 1. All contract work must be completed to homeowner’s satisfaction.
 - 2. Work must pass all required inspections of the Rehabilitation Specialist and the City and/or County Building Department.
 - 3. The borrower must sign the Owner's Certification and Acceptance of Improvements.
 - 4. The contractor must sign the Contractor's Warranty and Lien Waiver.
- G. **Contract Payments Withheld:** The Rehabilitation Specialist may withhold or, on account of subsequently discovered evidence, nullify the whole or a part of the Contract Sum owing to Contractor as may be necessary to protect the Owner and/or Grantee from loss on account of:
 - 1. Defective work not remedied.
 - 2. Claims filed or reasonable evidence indicating probable filing of claims.
 - 3. Failure of Contractor to make payments properly to subcontractors for material or labor.
 - 4. A reasonable doubt that the contract can be completed for the balance then unpaid.
 - 5. Damage to another Contractor.

6. Failure of Contractor to complete work within the time limits set forth in the Construction Contract.
7. Work not authorized under the Construction Contract or an approved Contract Change Order.
8. As the above grounds are removed, payment can be made for amounts withheld because of them.

H. **Contract Change Orders:** Any modification of the Construction Contract must be approved, in writing, by the Home Repair Specialist whose approval shall not be unreasonably withheld.

SECTION V: CONFLICT OF INTEREST

If CDBG funded, no employee of the Grantee or other 'covered persons' pursuant to 24CFR 570.489(h) who exercise any functions or responsibilities in connection with administration of the Home Repair Program shall be eligible for a Home Repair Program assistance, nor shall such a person have any interest, direct or indirect, in the proceeds of such a loan unless a waiver is granted in accordance with 24CFR 570.489(h).

SECTION VI: POLICY EXCEPTIONS

NWU, and OBDD if the project is CDBG funded, will approve assistance requiring exceptions to this Policy Manual. NWU may waive non-statutory program policies. The Rehabilitation Specialist will submit the request for the waiver. Requests for waivers will be evaluated based upon whether the requested waiver is necessary to accomplish the goals of the Home Repair Program and will apply only to the application for which the waiver was requested.

SECTION VII: GRIEVANCE PROCEDURE

In the event of a conflict between the homeowner and the contractor, the following procedure will be followed:

Prior to the beginning of work, both the homeowner and the contractor should have a clear and precise understanding of the work to be done. There may be times, however, when the understanding of the two parties may be different. In this event, the Rehabilitation Specialist will immediately attempt to mediate the problem. If the Rehabilitation Specialist is not able to mediate the problem to the mutual satisfaction of the homeowner and the contractor, then the contractor or homeowner can request a formal review of the case by the NWU Single Family Homes Division Manager or designee. Within 15 days of the request for review, the NWU Single Family Homes Division Manager or designee will issue a written decision. This decision may be appealed through the Construction Contractor's Board.

SECTION VIII: PROGRAM INCOME

Program income shall be managed in accordance with requirements of Title 1 of the Federal Housing and Community Development Act of 1984 as amended including, but not limited to, requirements for eligible costs, compliance with national objectives, environmental review, labor standards, procurement, equal employment opportunity, affirmatively furthering fair housing, nondiscrimination against persons with disabilities, and relocation and real property acquisition. The Grantee shall rely primarily on guidance from the State of Oregon in complying with these requirements, since the state is responsible for monitoring the local use of program income earned from Oregon Community Development Block Grant projects.

Program income earned as a result of this program shall be used for continuation of the rehabilitation loan program as described in the approved application and the Rehabilitation Loan Policies included in the approved applications.

SECTION XI: NON-COMPETITION

A goal of the Home Repair Program is to provide low cost financial assistance to lower income homeowners that do not have the ability to obtain or afford conventional financing from local lenders.

- A. Applicants with income below 50% of the local area median income limits will be assumed to not be able to afford or obtain conventional financing.
- B. Applicants whose original liens plus our estimated assistance amount based on the necessary repairs exceed 80% of the real market value of their home will be assumed to not be able to afford or obtain conventional financing.
- C. Applicants with income above 50% of the local area median income who would have more than 20% equity after all projected liens will have to demonstrate that conventional financing is not available by one of the following methods:
 - 1. Provide documentation showing that they have a credit score lower than 650.
 - 2. Provide documentation showing they have a debt to income ratio that exceeds 40%.
 - 3. Provide documentation from a local area lender preliminarily showing that they would not be eligible for a conventional loan.
 - 4. Provide a letter of denial from a local area lender.
- D. Applicants who are unable to obtain conventional financing for reasons other than listed above will have to be approved by NWU.

SECTION XII: NON-DISCRIMINATION

Federal regulations prohibit discrimination against certain protected classes. State and local requirements can also prohibit discrimination against additional classes of people.

- A. NWU shall not discriminate because of race, color, sex, sexual orientation, gender identity, religion, familial status, marital status, age, disability, national origin, source of income, or victims of domestic violence (called “protected classes”). Familial status includes children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18. NWU will not use any of these factors to:
1. Deny to any family the opportunity to apply for the program, nor deny to any qualified applicant the opportunity to participate in the program.
 2. Provide assistance that is different from that provided to others.
 3. Subject anyone to segregation or disparate treatment.
 4. Restrict anyone's access to any benefit enjoyed by others in connection with the program.
 5. Treat a person differently in determining eligibility or other requirements for admission.
 6. Steer an applicant or participant toward or away from a particular area based any of these factors.
 7. Deny anyone access to the same level of services.
 8. Deny anyone the opportunity to participate in a planning or advisory group that is an integral part of the program.
 9. Discriminate in the provision of residential real estate transactions.
 10. Discriminate against someone because they are related to or associated with a member of a protected class.
 11. Publish or cause to be published an advertisement or notice indicating the availability of assistance that prefers or excludes persons who are members of a protected class.
- B. **Discrimination Complaints:** Applicants or participants who believe that they have been subject to unlawful discrimination may notify the NWU Chief Operating Officer or designee either orally or in writing. The Chief Operating Officer or designee will attempt to remedy discrimination complaints made against the Home Repair Program. The Chief Operating Officer or designee will provide a copy of a discrimination complaint form to the complainant and provide them with information on how to complete and submit the form to HUD’s Office of Fair Housing and Equal Opportunity (FHEO).

SECTION XIII: REASONABLE ACCOMODATIONS

- A. **Notification:** The Home Repair Program will ask all applicants and participants if they require any type of accommodations, in writing, on the intake questionnaire, annual audit documents, and any notices of adverse action, by including the following language:
- “If you or anyone in your family is a person with disabilities, and you require a specific accommodation in order to fully utilize our programs and services, please contact (a specific name and phone number will be indicated as the contact for requests for accommodations for persons with disabilities).”
- B. **Reasonable Accommodation Policy:** This manual incorporates NWU’s Reasonable Accommodation Policy, and this policy applies to the Home Repair Program. The policy is

included as Attachment 4.

- C. **Verification of a Disability:** The regulatory civil rights definition for persons with disabilities is provided in Attachment 6. The definition of a person with a disability for the purpose of obtaining a reasonable accommodation is much broader than the HUD definition of disability. Before providing an accommodation, the Home Repair Program must determine that the person meets the definition of a person with a disability, and that the accommodation will enhance the family's access to the Home Repair Program and services.
- a. If a person's disability is obvious, or otherwise known to the Home Repair Program, and if the need for the requested accommodation is also readily apparent or known, no further verification will be required [Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations under the Fair Housing Act].
 - b. If a family indicates that an accommodation is required for a disability that is not obvious or otherwise known to the Home Repair Program, the Home Repair Program must verify that the person meets the definition of a person with a disability, and that the limitations imposed by the disability require the requested accommodation.
 - c. When verifying a disability, third-party verification must be obtained from an individual identified by the family who is competent to make the determination. A doctor or other medical professional, a peer support group, a non-medical service agency, or a reliable third party who is in a position to know about the individual's disability may provide verification of a disability [Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations under the Fair Housing Act].
 - d. The Home Repair Program must request only information that is necessary to evaluate the disability-related need for the accommodation. The Housing Specialist will not inquire about the nature or extent of any disability. Medical records will not be accepted or retained in the participant file.
 - e. In the event that the Housing Program does receive confidential information about a person's specific diagnosis, treatment, or the nature or severity of the disability, the Home Repair Program will dispose of it. In place of the information, the Home Repair Program will note in the file that the disability and other requested information have been verified, the date the verification was received, and the name and address of the knowledgeable professional who sent the information [Notice PIH 2010-26].

SECTION XIV: LIMITED ENGLISH PROFICIENCY

Language for Limited English Proficiency Persons (LEP) can be a barrier to accessing important benefits or services, understanding, and exercising important rights, complying with applicable responsibilities, or understanding other information provided by The Home Repair Program. In certain circumstances, failure to ensure that LEP persons can effectively participate in or benefit from federally- assisted

programs and activities may violate the prohibition under Title VI against discrimination on the basis of national origin. This part incorporates the Final Guidance to Federal Assistance Recipients Regarding Title VI Prohibition against National Origin Discrimination Affecting Limited English Proficient Persons, published January 22, 2007, in the Federal Register.

The Home Repair Program will take affirmative steps to communicate with people within a targeted area who need services or information in a language other than English. These persons will be referred to as Persons with Limited English Proficiency.

- A. **Definition:** LEP is defined as persons who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English. For the purposes of this policy, LEP persons are applicants and participants, and parents and family members of applicants and participants.
- B. **Four Factor Analysis:** To determine the level of access needed by LEP persons, the Home Repair Program will balance the following four factors: (1) the number or proportion of LEP persons eligible to be served or likely to be encountered by the program in a targeted area; (2) the frequency with which LEP persons come into contact with the program in a targeted area; (3) the nature and importance of the program, activity, or service provided by the program to people's lives in a targeted area; and (4) the resources available to the program and costs. Balancing these four factors will ensure meaningful access by LEP persons to critical services while not imposing undue burdens on the program.
- C. **Oral Interpretation:** The Home Repair Program will analyze the various kinds of contacts it has with the public, to assess language needs and decide what reasonable steps should be taken. "Reasonable steps" may not be reasonable where the costs imposed substantially exceed the benefits.
 - a. Where feasible, the Home Repair Program will have bilingual staff available to act as interpreters and translators.
 - b. Where LEP persons desire, they will be permitted to use, at their own expense, an interpreter of their own choosing, in place of or as a supplement to the free language services offered by the Home Repair Program. The interpreter may be a family member or friend.
- D. **Written Translation:** To comply with written-translation obligations, the Home Repair Program will take the following steps:
 - a. The Home Repair Program will provide written translations of vital documents for each eligible LEP language group that constitutes 5 percent or 1,000 persons in a targeted area, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered. Translation of other documents, if needed, can be provided orally; or
 - b. If there are fewer than 50 persons in a language group that reaches the 5 percent trigger in a targeted area, the Home Repair Program does not translate vital written materials, but provides written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

ATTACHMENT 1 - Preference Policy

If Home Repair assistance is funded with CDBG, ***there will not be any preferences***; eligible applicants are served on a first come-first served basis unless a true, bona fide emergency exists. If a bona fide emergency exists applications will be processed as follows:

1. Bona Fide Emergency
 - a. Number or severity of bona fide emergencies
2. Date and Time of Application submission

If assistance is funded with NWU revolving loan funds or non-CDBG grants, the preferences will be as follows:

Health & Safety

1. More than one Hazard/Emergency
2. One health or safety issue
3. Low Income
4. Senior/Disabled
5. Single Parent
6. Date
7. Moderate income

Low Income

1. Lowest income
2. Senior/Disabled
3. Single Parent
4. Date

Senior/Disabled

1. Senior & Disability
2. Senior or Disabled
3. Single Parent
4. Date

Single Parent

1. Single parent with child under the age of six
2. Single Parent with more than one child
3. Single Parent with one child
4. Date

NWU reserves the right to modify these preferences for specific projects in order to meet specific conditions, priorities, or targeted needs of grant funding awards.

ATTACHMENT 2 – Manufactured Housing Addendum

Based on funding availability, NWU's Home Repair Program provides assistance to homeowners who own manufactured homes. This addendum outlines the additional criteria used for providing home repair assistance to manufactured homes. NWU recognizes that manufactured homes are a prevalent and important part of rural Oregon's housing stock. NWU also recognizes that manufactured homes have specialized requirements and concerns related to their rehabilitation and the provisioning of financial assistance.

Generally, this addendum covers manufactured homes on leased land. Typically, these are homes in manufactured home communities where the homeowner owns the unit and leases a space from the park.

Manufactured homes located on land owned by the unit owner (fee simple ownership) will be treated like all other homes per Section II, provided the unit is de-titled, and on permanent foundation that meets the U.S. Department of Housing and Urban Development's Permanent Foundations Guide for Manufactured Housing (PFGMH) Handbook 4930.3G. Units on fee simple land that are not on permanent foundations or are on foundations that do not meet PFGMH standards are ineligible for assistance. Homeowners in this circumstance will be referred to NWU Financial Opportunity Center to receive assistance in determining other options.

GENERAL PROGRAM CONDITIONS

- A. **Type of assistance:** NWU will provide grant funds to the owner of the manufactured home. The grants to homeowners will be governed by Section II and Section IIA of this manual.
 - a. If the grants are funded with Community Development Block Grant fund, all applicable rules and regulations will apply and the grants will be made in accordance with the conditions of the Community Development Block Grant program, Oregon Business Development Department, and this manual.
- B. **Conditions of assistance:** The grant assistance is conditioned on the following:
 - a. The home to be repaired is owned by the homeowner receiving the grant assistance
 - i. NWU will verify ownership via the State of Oregon's Manufactured Home Ownership Document System. Owners will be asked to provide a copy of their Ownership Document.
 - b. The home is occupied full time by the owner.
 - c. The home is the owner's primary residence.
 - d. The homeowner has a written lease with the landowner that substantially conforms with the requirements of ORS 90.150. Manufactured Home Communities of Oregon (MHCO) standard form leases are acceptable.
 - e. The home is located within a park that is registered with the Manufactured and Marine Communities Resource Center (MMCRC).
 - f. The home must be connected to or be able to be connected to a source of potable water, sanitary sewer or septic system, and electricity. Homes that lack connections or

are unable to be connected to these utilities will be deemed ineligible for grant assistance.

- g. The home must have been built after 1978. Under no circumstances will assistance be provided to repair pre-1978 homes.
 - h. Structures not built to U.S. Department of Housing and Urban Development's Construction and Safety Standards ("HUD-code") are ineligible for assistance.
 - i. Recreational Vehicles or structures built to RVIA standards are ineligible for assistance.
 - i. Any structure deemed to be ineligible per Section II General Program Conditions C will not be eligible for assistance.
- C. Eligible and Ineligible Costs:** Use of grant assistance and cost eligibility/ineligibility will be the same as in Section II General Program Conditions A and B. Special emphasis will be placed on controlling water and moisture infiltration on homes assisted by the program.
- D. Conflicts:** This addendum is to be used as a supplement to the Home Repair Policy and Procedure Manual. Nothing in this addendum shall be deemed to supersede, or conflict with, the provisions of the Manual.

ATTACHMENT 3 – NWU Tiered Environmental Review Policy

This Attachment outlines the rules and authorities that apply to projects assisted with Community Development Block Grant funds, and the manner in which the program achieves compliance with the authorities.

Historic Preservation [36 CFR Part 800]

- **Projects will be evaluated on a case-by-case basis.** For all projects older than 49 years, NWU will consult with SHPO and THPOs to determine if the unit is national register eligible or on the national register. NWU will consider SHPO/THPOs comments and comply with part 36 CFR Part 800 prior to approving any loan or grant under this program. Individual homes may be located within local historic preservation districts or be historically significant and subject to local review in addition to SHPO/THPO review.

Floodplain Management [24 CFR 55, Executive Order 11988]

- No rehabilitation work will be performed on homes located within a floodway. The grant administrator will verify floodway status by reviewing the FEMA Flood Map for each home and filing this map in each project file. The program does not permit substantial / major rehabilitation exceeding 50% of the market value of the home and is restricted to the minor rehabilitation of single family owner occupied homes without changes, expansions or alternations to the footprint of the home. Homeowners with homes in floodplains will be advised to carry flood insurance.

Wetland Protection [Executive Order 11990]

- The policies and procedures do not allow new construction, alternation, or expansion of the footprint of any existing structure located in a Wetland.

Coastal Zone Management Act [Sections 307(c), (d)]

- The project does not permit substantial / major rehabilitation exceeding 50% of the market value of the home and is restricted to the minor rehabilitation of single-family owner-occupied homes without changes, expansions or alternations to the footprint of the home. This authority will generally be cleared at the regional level.

Sole Source Aquifers [40 CFR 149]

- NWU will assess the region for the presence of Sole Source Aquifers using EPA's Sole Source Aquifers for Drinking Water Interactive map. This authority will generally be cleared at the regional level.

Endangered Species Act [50 CFR 402]

- If the location is considered a critical habitat covered by NOAA and/or USFWS, for endangered

or threatened species, and the area to be served by the project overlaps this covered habitat, NWU will consult with NFWS, NMFS, and ODFW. However, the written program Policies and Procedures only allow minor housing rehabilitation and do not allow CDBG funds to be used for new construction, conversion of land use, major rehabilitation or the acquisition of undeveloped land, landscaping or hazardous tree removal and none of the assisted properties will be located in a riparian zone. No exterior repairs or improvements will increase post construction runoff nor will the amount of impervious surfaces be increased. All waste materials generated from project activities will be disposed of in an EPA approved sanitary or hazardous waste disposal site.

Wild and Scenic Rivers Act [Sections 7(b), and (c)]

- The project does not permit substantial / major rehabilitation exceeding 50% of the market value of the home and is restricted to the minor rehabilitation of single-family owner-occupied homes without changes, expansions or alternations to the footprint of the home. This authority will generally be cleared at the regional level.

Clean Air Act - [Sections 176(c), (d), and 40 CFR 6, 51, 93]

- NWU will screen for non-attainment areas; this will generally be cleared at the regional level. The housing rehabilitation program policies and procedures prohibit new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units.

Farmland Protection Policy Act [7 CFR 658]

- Conversion of farmland to non-agricultural uses is not an eligible activity for assistance under this project. This authority will generally be cleared at the regional level.

Environmental Justice [Executive Order 12898]

- Project is limited to minor rehabilitation of existing single-family owner-occupied homes. The housing rehabilitation program policies and procedures identify that acquisition of existing housing, acquisition of land for development and new construction are not eligible for assistance under the program. The program is limited to LMI participants who reside in the assisted units therefore there will be no disproportionate impact to minority or low- and moderate-income persons.

Noise Abatement and Control [24 CFR 51B]

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

Explosive and Flammable Operations [24 CFR 51C]

- Program is limited to minor rehabilitation of existing single-family owner-occupied homes.

Housing rehabilitation of owner-occupied single-family residential units is not considered to increase residential densities, convert a building for habitation, or make a vacant building habitable.

Toxic Chemicals and Radioactive Materials [HUD Notice 79-33]

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

Airport Clear Zones and Accident Potential Zones [24 CFR 51D]

- The program does not permit any work on homes located in Airport Clear Zone or Accident Potential Zone.

Flood Disaster Protection Act

- **Projects will be evaluated on a case-by-case basis.** NWU will determine whether a project is in a 100-year floodplain as identified by FEMA maps. If a project is located in a 100-year floodplain, evidence must be provided that the homeowner has flood insurance.

Coastal Barrier Resources Act

- There are no Coastal Barrier Resource Areas in Oregon.

ATTACHMENT 4 – NWU Reasonable Accommodation Policy

Reminder of page intentionally left blank.

Environmental Justice (CEST and EA)

General requirements	Legislation	Regulation
Determine if the project creates adverse environmental impacts upon a low-income or minority community. If it does, engage the community in meaningful participation about mitigating the impacts or move the project.	Executive Order 12898	
References		
https://www.hudexchange.info/environmental-review/environmental-justice		

HUD strongly encourages starting the Environmental Justice analysis only after all other laws and authorities, including Environmental Assessment factors if necessary, have been completed.

1. Were any adverse environmental impacts identified in any other compliance review portion of this project's total environmental review?

☐ Yes → Continue to Question 2.

☒ No → Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.

2. Were these adverse environmental impacts disproportionately high for low-income and/or minority communities?

☐ Yes

Explain:

→ Continue to Question 3. Provide any supporting documentation.

☐ No

Explain:

→ Continue to the Worksheet Summary and provide any supporting documentation.

3. All adverse impacts should be mitigated. Explain in detail the proposed measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.

☐ Mitigation as follows will be implemented:

→ Continue to Question 4.

☐ No mitigation is necessary.

Explain why mitigation will not be made here:

→ Continue to Question 4.

4. Describe how the affected low-income or minority community was engaged or meaningfully involved in the decision on what mitigation actions, if any, will be taken.

→ Continue to the Worksheet Summary and provide any supporting documentation.

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

The project is limited to minor rehabilitation of existing single-family owner-occupied homes. The housing rehabilitation program policies and procedures identify that acquisition of existing housing, acquisition of land for development and new construction are not eligible for assistance under the program. The program is limited to LMI participants who reside in the assisted units therefore there will only be a positive impact on minority or low and moderate-income persons. See Attachment 3 of the Policies and Procedures and the Environmental Justice Statement executed by the RE's Certifying Officer.

Are formal compliance steps or mitigation required?

☐ Yes

☒ No

Noise (CEST Level Reviews)

General requirements	Legislation	Regulation
HUD's noise regulations protect residential properties from excessive noise exposure. HUD encourages mitigation as appropriate.	Noise Control Act of 1972 General Services Administration Federal Management Circular 75-2: "Compatible Land Uses at Federal Airfields"	Title 24 CFR 51 Subpart B
References		
https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control		

1. What activities does your project involve? Check all that apply:

- ☐ New construction for residential use

NOTE: HUD assistance to new construction projects is generally prohibited if they are located in an Unacceptable zone, and HUD discourages assistance for new construction projects in Normally Unacceptable zones. See 24 CFR 51.101(a)(3) for further details.

→ Continue to Question 4.

- ☒ Rehabilitation of an existing residential property

NOTE: For modernization projects in all noise zones, HUD encourages mitigation to reduce levels to acceptable compliance standards. See 24 CFR 51 Subpart B for further details.

→ Continue to Question 2.

- ☐ A research demonstration project which does not result in new construction or reconstruction, interstate, land sales registration, or any timely emergency assistance under disaster assistance provisions or appropriations which are provided to save lives, protect property, protect public health and safety, remove debris and wreckage, or assistance that has the effect of restoring facilities substantially as they existed prior to the disaster

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.

- ☐ None of the above

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.

2. Do you have standardized noise attenuation measures that apply to all modernization and/or minor rehabilitation projects, such as the use of double-glazed windows or extra insulation?

☐ Yes

Indicate the type of measures that will apply (check all that apply):

- ☐ Improved building envelope components (better windows and doors, strengthened sheathing, insulation, sealed gaps, etc.)
- ☐ Redesigned building envelope (more durable or substantial materials, increased air gap, resilient channels, staggered wall studs, etc.)
- ☐ Other

Explain:

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below and provide any supporting documentation.

☒ No

→ Continue to Question 3.

3. Complete the Preliminary Screening to identify potential noise generators in the vicinity (1000' from a major road, 3000' from a railroad, or 15 miles from an airport). Describe findings of the Preliminary Screening:

Specific housing units to be assisted are not yet identified; therefore, no determination can be made at this time. Compliance with this requirement will be determined during the site-specific review.

→ Continue to Question 6.

4. Complete the Preliminary Screening to identify potential noise generators in the vicinity (1000' from a major road, 3000' from a railroad, or 15 miles from an airport). Indicate the findings of the Preliminary Screening below:

- ☐ There are no noise generators found within the threshold distances above.

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing the location of the project relative to any noise generators.

☐ Noise generators were found within the threshold distances.

→ Continue to Question 5.

5. Complete the Noise Assessment Guidelines to quantify the noise exposure. Indicate the findings of the Noise Assessment below:

☐ Acceptable: (65 decibels or less; the ceiling may be shifted to 70 decibels in circumstances described in §24 CFR 51.105(a))

Indicate noise level here:

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide noise analysis, including noise level and data used to complete the analysis.

☐ Normally Unacceptable: (Above 65 decibels but not exceeding 75 decibels; the floor may be shifted to 70 decibels in circumstances described in 24 CFR 51.105(a))

Indicate noise level here:

Is the project in a largely undeveloped area¹?

☐ No

→ Your project requires completion of an Environmental Assessment (EA) pursuant to 51.104(b)(1)(i). Elevate this review to an EA-level review.

Provide noise analysis, including noise level and data used to complete the analysis.

Continue to Question 6.

☐ Yes

→ Your project requires completion of an Environmental Impact Statement (EIS) pursuant to 51.104(b)(1)(i). Elevate this review to an EIS-level review.

Provide noise analysis, including noise level and data used to complete the analysis.

Continue to Question 6.

¹ A largely undeveloped area means the area within 2 miles of the project site is less than 50 percent developed with urban uses or does not have water and sewer capacity to serve the project.

☐ Unacceptable: (Above 75 decibels)

Indicate noise level here:

Your project requires completion of an Environmental Impact Statement (EIS) pursuant to 51.104(b)(1)(i). You may either complete an EIS or provide a waiver signed by the appropriate authority. Indicate your choice:

☐ Convert to an EIS

→ Provide noise analysis, including noise level and data used to complete the analysis.

Continue to Question 6.

☐ Provide waiver

→ Provide an Environmental Impact Statement waiver from the Certifying Officer or the Assistant Secretary for Community Planning and Development per 24 CFR 51.104(b)(2) and noise analysis, including noise level and data used to complete the analysis.

Continue to Question 6.

- 6. HUD strongly encourages mitigation be used to eliminate adverse noise impacts. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation. This information will be automatically included in the Mitigation summary for the environmental review.**

☐ Mitigation as follows will be implemented:

Specific housing units to be assisted are not yet identified; therefore, no determination can be made at this time. Compliance with this requirement will be determined during the site-specific review.

→ Provide drawings, specifications, and other materials as needed to describe the project's noise mitigation measures.

Continue to the Worksheet Summary.

☐ No mitigation is necessary.

Explain why mitigation will not be made here:

→ *Continue to the Worksheet Summary.*

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

Specific housing units to be assisted are not yet identified; therefore, no determination can be made at this time. Compliance with this requirement will be determined during the site-specific review.

Are formal compliance steps or mitigation required?

☐ Yes

☒ No

Explosive and Flammable Hazards (CEST and EA)

General requirements	Legislation	Regulation
HUD-assisted projects must meet Acceptable Separation Distance (ASD) requirements to protect them from explosive and flammable hazards.	N/A	24 CFR Part 51 Subpart C
Reference		
https://www.hudexchange.info/environmental-review/explosive-and-flammable-facilities		

1. Is the proposed HUD-assisted project itself the development of a hazardous facility (a facility that mainly stores, handles or processes flammable or combustible chemicals such as bulk fuel storage facilities and refineries)?

☒ No

→ Continue to Question 2.

☐ Yes

Explain:

→ Go directly to Question 5.

2. Does this project include any of the following activities: development, construction, rehabilitation that will increase residential densities, or conversion?

☒ No

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.

☐ Yes

→ Continue to Question 3.

3. Within 1 mile of the project site, are there any current *or planned* stationary aboveground storage containers that are covered by 24 CFR 51C? Containers that are NOT covered under the regulation include:

- Containers 100 gallons or less in capacity, containing common liquid industrial fuels OR
- Containers of liquified petroleum gas (LPG) or propane with a water volume capacity of 1,000 gallons or less that meet the requirements of the 2017 version of National Fire Protection Association (NFPA) Code 58.

If all containers within the search area fit the above criteria, answer “no.” For any other type of aboveground storage container within the search area that holds one of the

flammable or explosive materials listed in Appendix I of 24 CFR part 51 subpart C, answer “yes.”

☐ No

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide all documents used to make your determination.

☐ Yes

→ Continue to Question 4.

4. Visit HUD’s website to identify the appropriate tank or tanks to assess and to calculate the required separation distance using the [electronic assessment tool](#). To document this step in the analysis, please attach the following supporting documents to this screen:

- Map identifying the tank selected for assessment, and showing the distance from the tank to the proposed HUD-assisted project site; and
- Electronic assessment tool calculation of the required separation distance.

Based on the analysis, is the proposed HUD-assisted project site located at or beyond the required separation distance from all covered tanks?

☐ Yes

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.

☐ No

→ Go directly to Question 6.

5. Is the hazardous facility located at an acceptable separation distance from residences and any other facility or area where people may congregate or be present?

Please visit HUD’s website for information on calculating Acceptable Separation Distance.

☐ Yes

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide map(s) showing the location of the project site relative to residences and any other facility or area where people congregate or are present and your separation distance calculations.

☐ No

→ Provide map(s) showing the location of the project site relative to residences and any other facility or area where people congregate or are present and your separation distance calculations.
Continue to Question 6.

6. For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Mitigation measures may include both natural and manmade barriers, modification of the project design, burial or removal of the hazard, or other engineered solutions. Describe selected mitigation measures, including the timeline for implementation, and attach an implementation plan. If negative effects cannot be mitigated, cancel the project at this location.

Note that only licensed professional engineers should design and implement blast barriers. If a barrier will be used or the project will be modified to compensate for an unacceptable separation distance, provide approval from a licensed professional engineer.

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

The project is limited to minor rehabilitation of existing single-family owner-occupied homes. Housing rehabilitation of owner-occupied single-family residential units is not considered to increase residential densities, convert a building for habitation, or make a vacant building habitable. Therefore, compliance is met for this authority. See Project Description and Attachment 3 of the Policies and Procedures.

Are formal compliance steps or mitigation required?

☐ Yes

☒ No

Contamination and Toxic Substances (Single Family Properties)

General requirements	Legislation	Regulations
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 the occupants or conflict with the intended utilization of the property.		24 CFR 58.5(i)(2) 24 CFR 50.3(i)
Reference		
https://www.hudexchange.info/programs/environmental-review/site-contamination		

- 1. Evaluate the site for contamination. Were any on-site or nearby toxic, hazardous, or radioactive substances found that could affect the health and safety of project occupants or conflict with the intended use of the property?**

Provide a map or other documentation of absence or presence of contamination¹ and explain evaluation of site contamination in the Worksheet below.

☒ No

Explain:

Specific housing units to be assisted are not yet identified, therefore, no determination can be made at this time. Compliance with this requirement will be determined during the site-specific review.

→ Based on the response, the review is in compliance with this section.
Continue to the Worksheet Summary below.

☐ Yes

→ Describe the findings, including any recognized environmental conditions (RECs), in Worksheet Summary below. Continue to Question 2.

¹ Utilize EPA's Enviromapper and state/tribal databases to identify nearby dumps, junk yards, landfills, hazardous waste sites, and industrial sites, including EPA National Priorities List Sites (Superfund sites), CERCLA or state-equivalent sites, RCRA Corrective Action sites with release(s) or suspected release(s) requiring clean-up action and/or further investigation. Additional supporting documentation may include other inspections and reports.

Check here if an ASTM Phase I Environmental Site Assessment (ESA) report was utilized. [Note: HUD regulations does not require an ASTM Phase I ESA report for single family homes]

2. Mitigation

Document the mitigation needed according to the requirements of the appropriate federal, state, tribal, or local oversight agency. If the adverse environmental mitigation cannot be mitigated, then HUD assistance may not be used for the project at this site.

Can adverse environmental impacts be mitigated?

☐ Adverse environmental impacts cannot feasibly be mitigated

→ Project cannot proceed at this location.

☐ Yes, adverse environmental impacts can be eliminated through mitigation.

→ *Provide all mitigation requirements² and documents. Continue to Question 3.*

3. Describe how compliance was achieved. Include any of the following that apply: State Voluntary Clean-up Program, a No Further Action letter, use of engineering controls³, or use of institutional controls⁴.

If a remediation plan or clean-up program was necessary, which standard does it follow?

² Mitigation requirements include all clean-up actions required by applicable federal, state, tribal, or local law. Additionally, provide, as applicable, the long-term operations and maintenance plan, Remedial Action Work Plan, and other equivalent documents.

³ Engineering controls are any physical mechanism used to contain or stabilize contamination or ensure the effectiveness of a remedial action. Engineering controls may include, without limitation, caps, covers, dikes, trenches, leachate collection systems, signs, fences, physical access controls, ground water monitoring systems and ground water containment systems including, without limitation, slurry walls and ground water pumping systems.

⁴ Institutional controls are mechanisms used to limit human activities at or near a contaminated site, or to ensure the effectiveness of the remedial action over time, when contaminants remain at a site at levels above the applicable remediation standard which would allow for unrestricted use of the property. Institutional controls may include structure, land, and natural resource use restrictions, well restriction areas, classification exception areas, deed notices, and declarations of environmental restrictions.

- ☐ Complete removal
- ☐ Risk-based corrective action (RBCA)
- ☐ Other

→ *Continue to the Worksheet Summary.*

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

Specific housing units to be assisted are not yet identified, therefore, no determination can be made at this time. Compliance with this requirement will be determined during the site-specific review.

Are formal compliance steps or mitigation required?

☐ Yes

☒ No

Airport Hazards (CEST and EA)

General policy	Legislation	Regulation
It is HUD's policy to apply standards to prevent incompatible development around civil airports and military airfields.		24 CFR Part 51 Subpart D
References		
https://www.hudexchange.info/environmental-review/airport-hazards		

- 1. To ensure compatible land use development, you must determine your site's proximity to civil and military airports. Is your project within 15,000 feet of a military airport or 2,500 feet of a civilian airport?**

☒ No → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing that the site is not within the applicable distances to a military or civilian airport.*

☐ Yes → *Continue to Question 2.*

- 2. Is your project located within a Runway Potential Zone/Clear Zone (RPZ/CZ) or Accident Potential Zone (APZ)?**

☐ Yes, project is in an APZ → *Continue to Question 3.*

☐ Yes, project is an RPZ/CZ → *Project cannot proceed at this location.*

☒ No, project is not within an APZ or RPZ/CZ

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing that the site is not within either zone.*

- 3. Is the project in conformance with DOD guidelines for APZ?**

☐ Yes, project is consistent with DOD guidelines without further action.

Explain how you determined that the project is consistent:

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documentation supporting this determination.*

☐ No, the project cannot be brought into conformance with DOD guidelines and has not been approved. → *Project cannot proceed at this location.*

☐ Project is not consistent with DOD guidelines, but it has been approved by Certifying Officer or HUD Approving Official.

Explain approval process:

If mitigation measures have been or will be taken, explain in detail the proposed measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documentation supporting this determination.*

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

This project is for scatter sites within the Cities of Roseburg, Myrtle Creek, and all of Douglas County. HUD assistance will not be used for the purchase or sale of existing property. This project is limited to home rehabilitation grants for existing owner-occupied homes. No projects will be completed in an RPZ/CZ or APZ. See Policies and Procedures.

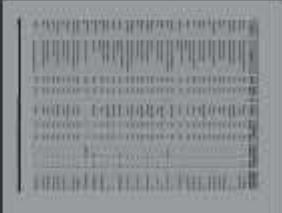
Are formal compliance steps or mitigation required?

☐ Yes

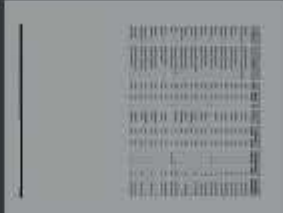
☒ No



83



84



85



86



Madras	Madras Municipal	S33	PU	Local	GA	GA	5	54	\$1,044,444
McDermitt	McDermitt State	26U	PU	Basic	GA	GA	0	0	\$1,360,000
McMinnville	McMinnville Municipal	MMV	PU	Regional	GA	GA	77	120	\$1,654,444
Medford	Rogue Valley International-Medford	MFR	PU	S	P	P	492,217	199	\$23,099,340

A-86 National Plan of Integrated Airport Systems (2021-2025)

City	Airport	LocID	Owner-ship	Hub	Role	Category		Current Activity		2021-2025 Dev Estimate
						Current	Year 5	Enplaned	Based	
Myrtle Creek	Myrtle Creek Municipal	16S	PU		Basic	GA	GA	0	12	\$855,555
Newport	Newport Municipal	ONP	PU		Regional	GA	GA	8	28	\$1,711,111
North Bend	Southwest Oregon Regional	OTH	PU	N		P	P	12,369	56	\$12,586,667
Ontario	Ontario Municipal	ONO	PU		Local	GA	GA	25	56	\$1,340,222
Pendleton	Eastern Oregon Regional at Pendleton	PDT	PU		Regional	CS	CS	6,396	62	\$8,810,527
Portland	Portland Downtown	61J	PU		Unclassified	GA	GA	0	0	\$0
Portland	Portland International	PDX	PU	L		P	P	9,804,868	77	\$30,559,384
Portland	Portland-Hillsboro	HIO	PU		National	R	R	288	256	\$30,500,000
Portland	Portland-Troutdale	TTD	PU		Local	R	R	5	52	\$18,333,334
Portland-Mulino	Mulino State	4S9	PU		Local	GA	GA	0	61	\$1,244,444
Prineville	Prineville	S39	PU		Local	GA	GA	6	100	\$6,589,999
Redmond	Roberts Field	RDM	PU	N		P	P	430,562	85	\$39,503,584
Roseburg	Roseburg Regional	RBG	PU		Regional	GA	GA	36	76	\$2,133,333
Salem	McNary Field	SLE	PU		Regional	GA	GA	176	168	\$4,972,221
Scappoose	Scappoose Industrial Airport	SPB	PU		Local	GA	GA	0	111	\$3,100,000
Seaside	Seaside Municipal	56S	PU		Unclassified	GA	GA	0	3	\$0
The Dalles	Columbia Gorge Regional/The Dalles Municipal	DLS	PU		Local	GA	GA	25	66	\$3,433,333
Tillamook	Tillamook	TMK	PU		Local	GA	GA	0	18	\$5,631,111
Wasco	Wasco State	35S	PU		Unclassified	GA	GA	0	4	\$0

ROME STATE (REQ)(KREO) 20 SW UTC-8(-7DT) N42°34.66' W117°53.13'

4053 NOTAM FILE REO

RWY 03-21: 6000X150 (GRVL)

AIRPORT REMARKS: Unattended. Sage growing in primary sfc. Rwy 03-21 sagebrush growing on west portion of rwy. Rwy 03-21 ltd by arpt opr to 8000 lbs single wheel gear.

AIRPORT MANAGER: 503-378-4880

COMMUNICATIONS: CTAF 122.9

RCO 122.65 (BOISE RADIO)

CLEARANCE DELIVERY PHONE: For CD if una to ctc on FSS freq, ctc Salt Lake ARTCC at 801-320-2568.

RADIO AIDS TO NAVIGATION: NOTAM FILE REO.

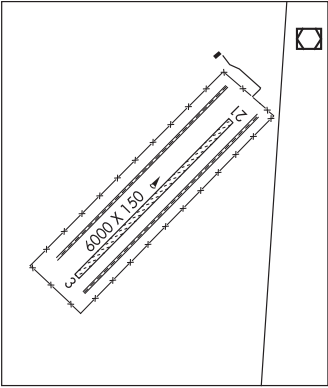
(H) (H) **VORW/DME** 112.5 REO Chan 72 N42°35.43' W117°52.09' 206° 1.1 NM to fld. 4040/19E.

DME unusable:

095°-105° byd 30 NM blo 10,000'

115°-125° byd 30 NM blo 10,000'

KLAMATH FALLS



ROSEBURG

GEORGE FELT (5S1) 3 W UTC-8(-7DT) N43°12.93' W123°24.26'

428 NOTAM FILE MMV

RWY 10-28: 2300X100 (TURF) 0.4% up E

RWY 10: Tree.

RWY 28: Brush. Rgt tfc.

NOISE: For NS ABTMT fly to river before turning.

AIRPORT REMARKS: Attended irregularly. Deer frequently on rwy. Migratory flocks of waterfowl on and invof arpt. Soft earth off rwy and twy when wet. Monitor Roseburg Rgnl CTAF/UNICOM for conflicting acft. Rwy 28 4' fence at 30' crossing apch. Rwy 10 +25' trees at 50' from cntrln both sides.

AIRPORT MANAGER: 541-673-7709

COMMUNICATIONS: CTAF 122.9

CLEARANCE DELIVERY PHONE: For CD ctc Seattle ARTCC at 253-351-3694.

KLAMATH FALLS

ROSEBURG RGNL (RBG)(KRBG) 1 NW UTC-8(-7DT) N43°14.36' W123°21.35'

533 B NOTAM FILE RBG

RWY 16-34: H5003X100 (ASPH) S-42, D-54, 2D-88 MIRL

0.7% up N

RWY 16: REIL. Thld dsplcd 1100'. Hill.

RWY 34: REIL. PAPI(P4R)—GA 4.0° TCH 53'. Thld dsplcd 372'. Road.

SERVICE: S4 FUEL 100LL, JET A OX1 LGT ACTIVATE REIL Rwy 16 and Rwy 34, MIRL Rwy 16-34—CTAF. Rwy 34 PAPI opr continuously.

AIRPORT REMARKS: Attended 1600-0100Z†. Waterfowl on and invof arpt. Rwy 16 has a 150' blast pad marked with yellow chevrons. Segmented circle NSTD, marked with white tires.

AIRPORT MANAGER: 541-672-7701

WEATHER DATA SOURCES: ASOS 135.475 (541) 673-1483.

COMMUNICATIONS: CTAF/UNICOM 122.8

RCO 122.55 (MC MINNVILLE RADIO)

® **SEATTLE CENTER APP/DEP CON** 127.55

CLEARANCE DELIVERY PHONE: For CD if una to ctc on FSS freq, ctc Seattle ARTCC at 253-351-3694.

RADIO AIDS TO NAVIGATION: NOTAM FILE MMV.

(L) (L) **VORW/DME** 108.2 RBG Chan 19 N43°10.94' W123°21.13' 337° 3.4 NM to fld. 1309/20E.

DME unusable:

070°-130° byd 20 NM blo 8,000'

130°-190° byd 30 NM blo 7,000'

240°-320° byd 25 NM blo 5,000'

VOR unusable:

070°-130° byd 20 NM blo 8,000'

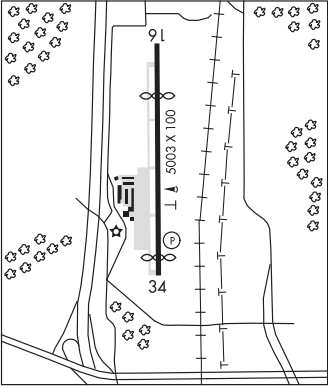
130°-150° byd 20 NM blo 7,000'

240°-290° byd 25 NM blo 5,000'

KLAMATH FALLS

H-18, L-1A

IAP



Flood Insurance (CEST and EA)

General requirements	Legislation	Regulation
Certain types of federal financial assistance may not be used in floodplains unless the community participates in National Flood Insurance Program and flood insurance is both obtained and maintained.	Flood Disaster Protection Act of 1973 as amended (42 USC 4001-4128)	24 CFR 50.4(b)(1) and 24 CFR 58.6(a) and (b); 24 CFR 55.1(b).
Reference		
https://www.hudexchange.info/environmental-review/flood-insurance		

1. Does this project involve mortgage insurance, refinance, acquisition, repairs, construction, or rehabilitation of a structure, mobile home, or insurable personal property?

☐ No. This project does not require flood insurance or is excepted from flood insurance. →
Continue to the Worksheet Summary.

☒ Yes → *Continue to Question 2.*

2. Provide a FEMA/FIRM map showing the site.

The Federal Emergency Management Agency (FEMA) designates floodplains. The [FEMA Map Service Center](#) provides this information in the form of FEMA Flood Insurance Rate Maps (FIRMs). For projects in areas not mapped by FEMA, use the best available information to determine floodplain information. Include documentation, including a discussion of why this is the best available information for the site. Provide FEMA/FIRM floodplain zone designation, panel number, and date within your documentation.

Is the structure, part of the structure, or insurable property located in a FEMA-designated Special Flood Hazard Area?

☐ No → *Continue to the Worksheet Summary.*

☒ Yes → *Continue to Question 3.*

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

☒ Yes, the community is participating in the National Flood Insurance Program.

For loans, loan insurance or loan guarantees, flood insurance coverage must be continued for the term of the loan. For grants and other non-loan forms of financial assistance, flood insurance coverage must be continued for the life of the building irrespective of the transfer of ownership. The amount of coverage must equal the total project cost or the maximum coverage limit of the National Flood Insurance Program, whichever is less

Provide a copy of the flood insurance policy declaration or a paid receipt for the current annual flood insurance premium and a copy of the application for flood insurance.

→ Continue to the Worksheet Summary.

- ☐ Yes, less than one year has passed since FEMA notification of Special Flood Hazards.
If less than one year has passed since notification of Special Flood Hazards, no flood Insurance is required.

→ Continue to the Worksheet Summary.

- ☐ No. The community is not participating, or its participation has been suspended.

Federal assistance may not be used at this location. Cancel the project at this location.

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

This project is for scatter sites within the Cities of Roseburg, Myrtle Creek, and all of Douglas Counties. All three communities participate in NFIP as per the attached list provided by the Federal Emergency Management Agency Community Status Book Report for Oregon.

Are formal compliance steps or mitigation required?

☐ Yes

☒ No

Coastal Barrier Resources (CEST and EA)

General requirements	Legislation	Regulation
HUD financial assistance may not be used for most activities in units of the Coastal Barrier Resources System (CBRS). See 16 USC 3504 for limitations on federal expenditures affecting the CBRS.	Coastal Barrier Resources Act (CBRA) of 1982, as amended by the Coastal Barrier Improvement Act of 1990 (16 USC 3501)	
References		
https://www.hudexchange.info/environmental-review/coastal-barrier-resources		

Projects located in the following states must complete this form.

Alabama	Georgia	Massachusetts	New Jersey	Puerto Rico	Virgin Islands
Connecticut	Louisiana	Michigan	New York	Rhode Island	Virginia
Delaware	Maine	Minnesota	North Carolina	South Carolina	Wisconsin
Florida	Maryland	Mississippi	Ohio	Texas	

1. Is the project located in a CBRS Unit?

☒ No → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing that the site is not within a CBRS Unit.*

☐ Yes → *Continue to Question 2.*

Federal assistance for most activities may not be used at this location. You must either choose an alternate site or cancel the project. In very rare cases, federal monies can be spent within CBRS units for certain exempted activities (e.g., a nature trail), after consultation with the Fish and Wildlife Service (FWS) (see [16 USC 3505](#) for exceptions to limitations on expenditures).

2. Indicate your selected course of action.

☐ After consultation with the FWS the project was given approval to continue
 → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map and documentation of a FWS approval.*

☐ Project was not given approval
Project cannot proceed at this location.

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

There are no Coastal Barrier Resource Areas in Oregon.

Are formal compliance steps or mitigation required?

☐ Yes

☒ No