



U.S. Department of Housing and Urban
Development
451 Seventh Street, SW
Washington, DC 20410
www.hud.gov
espanol.hud.gov

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

Project Information

Project Name: Healthy-Homes-Production

**HEROS
Number:** 900000010327850

**Responsible Entity
(RE):** BROCKTON, 45 School St Brockton MA, 02301

**State / Local
Identifier:**

RE Preparer: Claudio Eliseu De Pina Gomes

**Certifying
Officer:**

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

Point of Contact:

**Consultant (if
applicable):**

Point of Contact:

**Project
Location:** Brockton, MA 02301

Additional Location Information:
N/A

**Direct Comments
to:**

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

The BRA's work plan addresses each stage of the grant lifecycle from the application stage to closeout through detailed admirative oversight. The applicant, tenant/homeowner, applies for funding to remediate the environmental health and safety hazards from their units. Tenants will request approval from the landlord in order to go through the program. Upon receipt of the application, the Program Manager (PM) will verify the application and determine if the applicant is income eligible and complete the Environmental Review Record (ERR). When ERR is finished and no substantial findings have been determined, the IDIS/HEROS system will create the activity. Subsequently, the PM will issue a notice to proceed to the certified inspector, and the program start-up will commence. The inspector will schedule a site visit with the tenant/homeowner and conduct testing in the unit for asbestos, mold/mildew, and rodent and prepare a report of all testing conducted and their findings. The report is sent to the Rehabilitation Specialist (RS) and PM within 2 weeks of inspection. Once commenced, the RS will then prepare the specifications and work write-up. A Request for Proposals (RFP) will then be sent to contractors in order to submit their bids. BRA's bidding process is open to any local contractor within the surrounding community with the lowest bidder provided with an award letter. Subsequently, an agreement is executed and an affordable housing restriction takes place, and BRA will cover the recording fees. After implementation of the agreement, activities are funded in IDIS, and construction will commence within ten days. During this period, RS will be responsible for conducting pre-construction, during-construction, and post-construction inspections, and monitoring. During monitoring the RS provides both the PM and PD with progress reports that include worksite images for review. All requisitions payments, including relocations, are forwarded to the Financial Manager (FM) for payment processing. The FM will prepare the invoice with backup and attach it to our vendor request form for each specific activity and its IDIS. The invoice will be entered in the Healthy Homes Production Program expense form that gets submitted to the Finance Department in order to receive the checks. When work is complete, the PM & PD will conduct a project completion inspection, and accomplishments or findings will be identified prior to activity closeout. If the homeowner is satisfied, a work completion satisfactory agreement will be executed by all parties involved in the project. Finally, the PM will input the activity's accomplishment on IDIS, and close out the activity. Those invoices are submitted monthly by the PM with all backups to the Finance Manager (FM) at the BRA. Once the FM approves and is signed off on by the Program Director or Executive Director, they are submitted to the City of Brockton's auditing department for the payment advance. When approved at the City level, the funds are provided and the BRA deposits the payment advance from the City on its financial accounts. The deposit and each invoice are then entered into QuickBooks. Checks are signed by BRA Board Members, and any checks over \$2,000.00 must have two signatures. After the checks have gone out, a drawdown is prepared by the PM for the funds expended, and it is approved by the PD before being provided to the City of Brockton's auditing department again for approval and submission. Lastly, being approved by the grants HUD representative. There are no anticipated changes in unit density to be changed by more than 20%.

Maps, photographs, and other documentation of project location and description:

Approximate size of the project area:

Length of time covered by this review: 3 Years

Maximum number of dwelling units or lots addressed by this tiered review:
120

Level of Environmental Review Determination:

Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at §58.5: 58.35(a)(3)

Determination:

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

Approval Documents:

[Tier 1 ER Sig page.pdf](#)

7015.15 certified by Certifying Officer on:

7015.16 certified by Authorizing Officer on:

Funding Information

Grant Number	HUD Program	Program Name
MAHHP012023	Healthy Homes and Lead Hazard Control	

Estimated Total HUD Funded Amount: \$2,000,000.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$2,000,000.00

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

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6	Was compliance achieved at the broad level of review?	Describe here compliance determinations made at the broad level and source documentation.
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6		
Airport Hazards	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Coastal Barrier Resources Act	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Flood Insurance	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5		
Air Quality	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Coastal Zone Management Act	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Contamination and Toxic Substances	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Endangered Species Act	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Explosive and Flammable Hazards	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Farmlands Protection	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Floodplain Management	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Historic Preservation	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Noise Abatement and Control	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Sole Source Aquifers	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Wetlands Protection	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Wild and Scenic Rivers Act	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
ENVIRONMENTAL JUSTICE		
Environmental Justice	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

Supporting documentation

[AIR QUALITY INDEX BROCKTON.pdf](#)

[CBRS.jpg](#)

[czm-regions.pdf](#)

[FEMA MAP.pdf](#)

[FEMA MAP\(1\).pdf](#)

[SSA.png](#)

[Wild Scenic Rivers MA \(1\).jpg](#)

[airport distance.png](#)

Written Strategies

The following strategies provide the policy, standard, or process to be followed in the site-specific review for each law, authority, and factor that will require completion of a site-specific review.

1	Airport Hazards
	The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements.
2	Coastal Barrier Resources
	This project is not located in a CBRS Unit. Therefore, this project has no potential to impact a CBRS Unit and is in compliance with the Coastal Barrier Resources Act.
3	Flood Insurance
	The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with flood insurance requirements.
4	Air Quality
	The project's county or air quality management district is in attainment status for all criteria pollutants. The project is in compliance with the Clean Air Act.
5	Coastal Zone Management
	This project is not located in or does not affect a Coastal Zone as defined in the state Coastal Management Plan. The project is in compliance with the Coastal Zone Management Act.
6	Contamination and Toxic Substances
	On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. The project is in compliance with contamination and toxic substances requirements.
7	Endangered Species
	This project will have No Effect on listed species due to the nature of the activities involved in the project. This project is in compliance with the Endangered Species Act.
8	Explosive and Flammable Hazards
	Based on the project description the project includes no activities that would require further evaluation under this section. The project is in compliance with explosive and flammable hazard requirements.
9	Farmlands Protection
	This project does not include any activities that could potentially convert agricultural land to non-agricultural use. The project is in compliance with the Farmland Protection Policy Act.
10	Floodplain Management
	This project does not occur in a floodplain. The project is in compliance with Executive Order 11988
11	Historic Preservation

	Based on the project description the project has No Potential to Cause Effects. The project is in compliance with Section 106
12	Noise Abatement and Control
	The project is the modernization or minor rehabilitation of an existing residential property. The project will include standardized noise attenuation measures. The project is in compliance with HUD's Noise regulation
13	Sole Source Aquifers
	The project is not located in a sole source aquifer area. The project is in compliance with Sole Source Aquifer requirements
14	Wetlands Protection
	The project will not impact on- or off-site wetlands. The project is in compliance with Executive Order 11990
15	Wild and Scenic Rivers
	This project is not within proximity of an NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act.
16	Environmental Justice
	No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898

Supporting documentation

APPENDIX A: Site Specific Reviews