Tips for a Successful Environmental Review
Vermont Community Development Program

Starting the Environmental Review Process

- The Environmental Review is meant to be a part of the planning process, the Environmental Review should be started as early on in the process as possible.
- Only municipalities are eligible to receive Community Development Block Grants (CDBG) administered by the Vermont Community Development Program. If you are not directly part of the municipal staff, engage with the municipality early on, as they will be the Responsible Entity for the Environmental Review, sponsor of the project application and ultimately the grantee of the CDBG funds (if awarded). Be sure the municipality has an understanding of the Environmental Review process and their role in the process, before you have them open up the Environmental Review in the GEARS system.
- Be realistic about the time that will be required to complete the Environmental Review for your project. Incorporate the receipt of the Environmental Review Release into your project's timeline and be sure all Choice Limiting Activities are scheduled to take place AFTER the anticipated Environmental Review Release. The timeline for every Environmental Review is different, the Environmental Officer can help you determine what is realistic for your project.
- If you plan on using CDBG funds to be reimbursed for Environmental Review related costs (if awarded) be sure to: 1) get quotes for the applicable services early on, so they can be accurately accounted for in the budget you provide in your application, 2) follow procurement requirements when hiring for these services (if applicable), 3) be sure that all actual expenditures are accounted for accurately in the final project budget included in the project's Grant Agreement.
- **As indicated above, Environmental Review requirements impact a project's timeline and budget. Completion of the Environmental Review is not required before submitting an application, but it is critical that you have a handle on what environmental review components may impact your project's timeline/budget in order to properly represent the budget and timeline in the project's application.**
- Identify ALL potential HUD funding sources early on (ex. CDBG, HOME, National Housing Trust Fund, Section 8 Project Based Vouchers, utilization of HUD's Risk Share Program), as these all need to be addressed in the Environmental Review. The failure to include a HUD funding source in the Environmental Review, and later pursuing that funding source, may result in the need for the Environmental Review to be redone or updated.

While Completing the Environmental Review Process

- Never hesitate to contact the Environmental Officer* for all Environmental Review questions, concerns and guidance.
- The Project Description is very important:
    - The project description must capture the maximum scope of the proposal, not just what the HUD funding will be covering.
    - Include all potential project activities, if an activity or project component is added after the Environmental Review Release is received and that component was not included in the project description for the Environmental Review, a new Environmental Review may be required.

- o The project description may change as a result of the Environmental Review process, the project description should be revisited at the end of the review to ensure it accurately represents the final project activities and scope.
- The Environmental Review Compliance Guidance and Statutory Checklist Requirements provides compliance guidance, checklist requirements, links to instructions for completing necessary supporting documentation, and links to additional resources and applicable forms. Use this as a guide and reference while completing the Environmental Review.
- If you are completing an Environmental Review at the Assessment level, use the Environmental Assessment Questions as a guide and reference while completing the NEPA Assessment Checklist.
- **Toxic Sites, Historic Preservation and Floodplain Management/Wetland Protection are often the most time-consuming/expensive components of any given Environmental Review, the review of these components should be initiated as early on in the process as possible.**
- Be sure to review your project's activities against the threshold of applicability for each regulation required by the Environmental Review process (those factors listed on the Statutory Checklist) to determine if your project is subject to that regulation before moving forward with additional analysis steps. This will result in the most efficient and streamlined Environmental Review process. Have the Environmental Officer assist you with determining if any given regulation is applicable to your project. If it is determined that a regulation is non-applicable to your project, you must cite specifically why the regulation is non-applicable and supporting documentation may still be needed to support this determination.
- When the Environmental Review is ready for review, change the status in the GEARS system. Otherwise, the Environmental Officer will not know it is ready for review. If you would like a preliminary review of the Environmental Review before all components are complete, communicate with the Environmental Officer directly.
- When you submit your Environmental Review for pre-approval, it is recommended that you submit the Checklist in word document format to allow for the Environmental Officer to use track changes to make edits and comments directly to the document. This allows for a more efficient review.

After the Environmental Review Release is Received

- The Environmental Review Release will detail what mitigation measures are required to be carried out during implementation to ensure compliance with all applicable regulations. READ the Environmental Review Release and be sure you fully understand what is required. Reference the Environmental Review Release throughout the implementation phase of the project to ensure nothing is overlooked and environmental review conditions are satisfied.
- It is helpful if you provide the Environmental Officer with an anticipated project timeline (construction start and completion dates) at the time of Environmental Review Release.
- Be in touch with the Environmental Officer if there are changes in the anticipated timeline for the project and/or changes to the scope of project activities.

*For questions regarding the Environmental Review Process, please contact:
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