A Tiered Environmental Review is required for projects that include unidentified locations, such as VCDP Scattered Site grants.

At the Tier II level, a copy of the FIRMette for the project location and proof of flood insurance (if obtained) will/shall be included as part of the ERR.

At the Tier II level, a Federal Emergency Management Agency (FEMA) floodplain map (FIRMette) will be created using FEMA Online Map Service (https://msc.fema.gov/portal/search), to determine if the project is in the floodplain. For each project location, the relevant FIRMette with panel number, effective date, and project location clearly delineated and labeled, will be included as part of the ERR. If the project location is not mapped in the FEMA system, the best available information should be considered to determine the property’s history of flooding and potential flood risk.

The Subgrantee will not fund projects or activities at sites located in floodways.

8-Step Process for Floodplain Management

Minor improvements, defined in 24 CFR 55.2 (b)(8) as the cost of repairs is less than 50% of the value of the structure (excluding the land), for 1 to 4-unit family properties within the floodplain receiving HUD assistance are exempt from the 8-step decision making process. At the Tier II level, if the site-specific location falls within the 100-year floodplain (or 500-year floodplain for critical action) and does not meet the above criteria, the Subgrantee will work with the Environmental Officer to complete the 8-step decision making process and achieve compliance.

Flood Insurance

If a project falls within the 100-year floodplain there are four exceptions for flood insurance:

1. **Formula grants made to states**
2. Self-insured state-owned property within states approved by the Federal Insurance Administrator consistent with 44 CFR 75.11
3. Small loans ($5,000 or less)
4. Assisted leasing that is not used for repairs, improvements, or acquisition

Project grant qualifies under exemption #1. If a project falls within the 100-year floodplain and the municipality in which the project site is located participates in the National Flood Insurance Program, the Subgrantee understands that the homeowner should be encouraged (but not required) to obtain and maintain flood insurance (as it pertains to the VCDP Scattered Site grant compliance). It is understood that a homeownership center may have a more restrictive flood insurance policy.