

HEROS Kickoff for Partner Roll-Out

Partner Training

FEBRUARY 1, 2018



Changes on Feb. 1, 2018

- Consultants and PHAs working on Part 50 RAD environmental reviews are encouraged to start using HEROS on February 1
- Due to a technical issue, the rollout to FHA Multifamily programs is delayed
 - FHA Multifamily Partner rollout is anticipated in May 2018
 - Welcome to attend training now or watch the recording later



Introduction



Agenda

- Purpose of HUD Environmental Review
 - Partners' role in environmental review process
- HEROS overview
- Conducting Reviews in HEROS
 - Project Description
 - Level of Review
 - Part 50, RAD and MAP requirements
 - Finishing Partner Review
- Tools and Resources

Purpose of Conducting Environmental Reviews

Assurance that HUD projects are decent, safe, and sanitary

- Analysis of the impact of a project on the surrounding environment *and* the impact the surrounding environment will have on a project

Documentation of compliance with up to 17 federal environmental laws and authorities

- Public documents that encourage public participation
- Requirement under the National Environmental Policy Act (NEPA)
 - Requires all Federal agencies to adopt a systematic interdisciplinary approach to **decision-making** to ensure environmental values are considered

Environmental Review Record (ERR)

NEPA administrative record for each project

- Includes maps, correspondence, determinations, findings, photographs, plans, public notices...

Public has the right to review

- Maintain with the public's interest in mind

Must use correct formats

- Previously: Form HUD-4128
- Now: HEROS-Form HUD-4128

Environmental Reviews:

Partner Roll-Out

Applicants and their third party contractors/consultants may prepare supporting documentation.

HUD must **independently evaluate** their work & prepare the environmental reviews (i.e. supplement, correct, append, etc.)

Certain aspects of environmental review (e.g. contacting tribes) must be completed by HUD.

- Correspondence and public notices must be sent under HUD's signature on its letterhead.

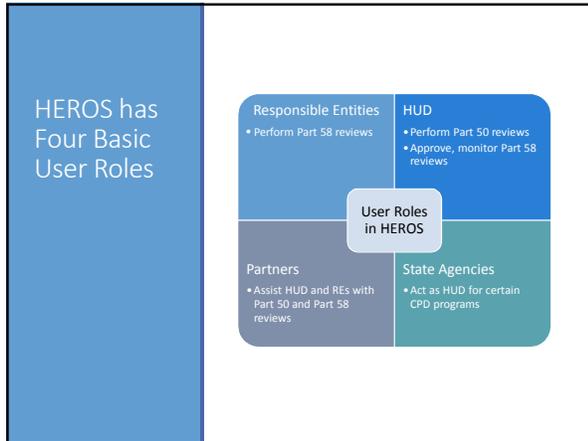
What is HEROS?

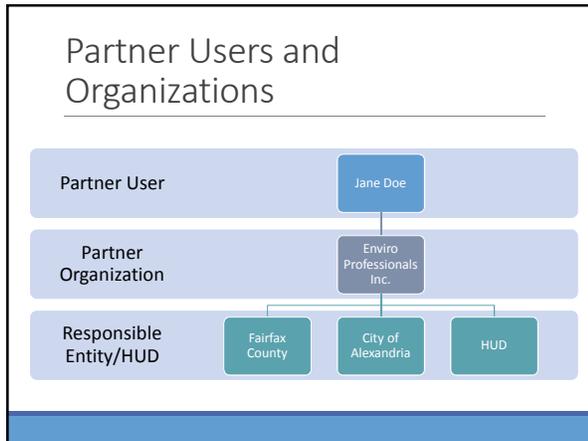
What is HEROS?

HEROS is a new HUD system that replaces HUD's current paper-based environmental review process (including the 4128) with a consistent, comprehensive online tool.

HEROS walks users through the entire environmental review process from beginning to end, including compliance with related laws and authorities.

It works for Part 50 and Part 58 environmental reviews in all HUD programs.





HEROS Process for Partners

CURRENTLY

- Partners assemble data and documents and submit to HUD
 - Currently, this information is submitted to HUD and HUD staff enters all information and uploads all documents into HEROS. HUD recommends using [Partner Worksheets](#) to submit information

NEW PROCESS

- With this rollout, partners can now input this information directly into HEROS. HEROS screens are equivalent to the Partner Worksheets.

HEROS Process for HUD Preparers

CURRENTLY

1. HUD preparer reviews information and completes analysis as needed
 - Follow up for any missing information
 - Uploads information into HEROS
 - Complete all findings and determinations that must be made by HUD
 - Get all required signatures in HEROS

NEW PROCESS

1. HUD preparer reviews information directly in HEROS
 - Follow up for any missing information
 - Complete all findings and determinations that must be made by HUD
 - Get all required signatures in HEROS

Conducting A Review in HEROS

Cheat Sheets

Cheat sheets have detailed information on how to comply with Program requirements

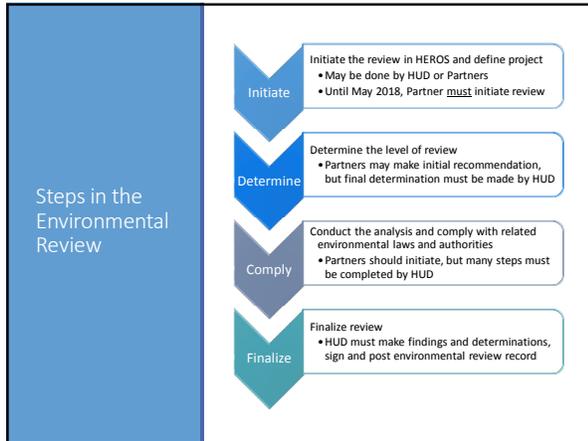
Using HEROS as a RAD Partner
 The purpose of this document is to provide instructions to consultants and Public Housing Authorities utilizing HUD with Part 50 environmental reviews for RAD conversions.

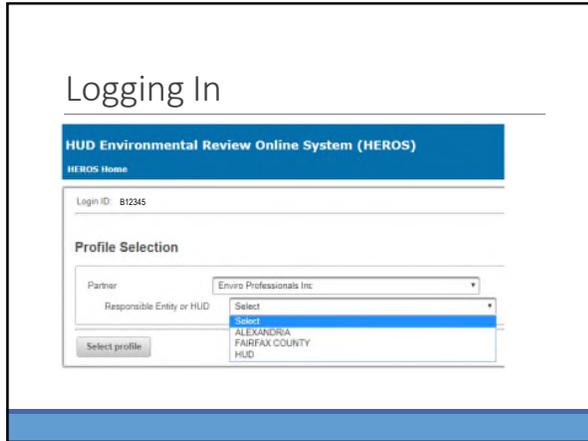
Getting Started
 For basic information on using HEROS, including instructional videos and frequently asked questions, go to <https://www.hudexchange.info/developmental-review/heritage/>. Technical questions about HEROS would go to Ask A Question at <https://www.hudexchange.info/get-assistance/my-questions/>. Project results or environmental review questions should go to your HUD Program contact.

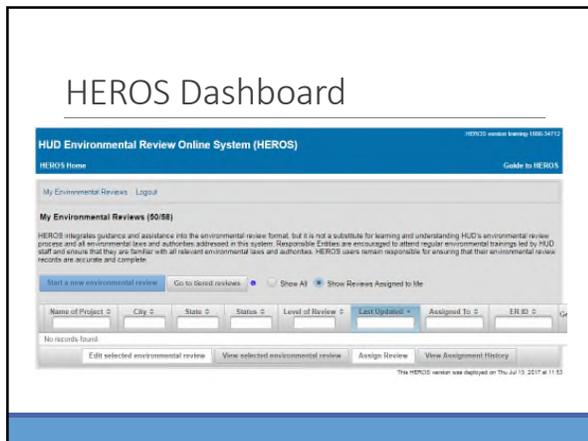
Note that your portion of the environmental review should be in HEROS by the time the Financing Plan is submitted.

Logging in to HEROS
 Log into HEROS at <https://heros.hud.gov/heros/>. Select the name of your organization as the "Partner" of HUD next to "Responsible Entity or HUD."

You will be directed to Screen 1000 - My Environmental Reviews dashboard. This screen will default to showing only those reviews that are currently assigned to you, meaning that you can currently edit them. (It will likely be blank the first time you log in.) From this screen, you can select an existing review (click on assign to another user). To start a new review, press the "Start a new environmental review" button in the upper left.







Project Summary Screen

[How Partners should enter information](#)

Field on Screen 1125	Response for Either Program
Description of the proposed project	Provide a project description that captures the maximum anticipated scope of the proposal. It should include all contemplated actions which logically are, either geographically or functionally, a composite part of the project, regardless of the source of funding. Describe all physical aspects of the project, such as plans for multiple phases of development, size and number of buildings, and activities to be undertaken. Include details of the physical impacts of the project, including whether there will be ground disturbance. If more space is required, upload a separate document below.
Address	Provide a representative street address for the project
Location Information	If the project involves new construction, affects more than one street address, or otherwise requires further explanation, describe the full geographic scope of the project in this space
Upload	Upload any site maps, photos, and other information on the project description and location
Field Inspection	Leave this section for HUD to complete

Project Description:

[Partner Initiated](#)

Meaningful project descriptions include...

Location—describe so the public can locate

Purpose and Need—describe what is being done and why it is necessary

Project Beneficiaries (i.e. affordable housing project, mixed use housing project, market rate housing project)

Description—provide complete details about the project/what will be done

- All activities (e.g. new construction of multifamily housing, rehabilitation of existing buildings)
- Physical description of existing and/or proposed new buildings
- Timeframe for implementation
- Size of the project (area coverage, disturbance footprint, number of units, population served)

All funding sources

All development partners

- Review by the HUD preparer for accuracy and completeness is required

Determining Level of Review

- Partners may make a preliminary level of review selection
- Only HUD can make the final level of review determination, and must approve Partner’s selection
- Refer to program guidance for information on determining level of review

Additional MAP Requirements:

Partner Initiated

Chapter 9 of the MAP Guide imposes additional environmental review requirements beyond those in 24 CFR Part 50:

- Lead-based paint (9.5.A)
- Asbestos (9.5.B)
- Radon (9.5.C)
- Towers (9.5.P)
- Oil or Gas Wells (9.5.P)
- Pipelines (9.5.P)
- Transmission Lines (9.5.P)

In some cases, it will also place additional requirements on the 50.4 laws and authorities not otherwise required of HUD projects.

- Contamination requirements in 9.3 and 9.4
- Floodplain requirements in 9.5.E
- Explosive/Flammable Hazards in 9.5.I

Additional RAD Requirements

RAD follows the MAP guide with two exceptions for PBRA with no FHA:

- The PHA or owner may provide either an ASTM 1527-13 Phase 1 OR an ASTM E 1528-14 transaction screen
- Radon testing is encouraged but not required

Related Laws and Authorities as a Partner

- A Partner cannot legally complete the full analysis and compliance steps for all laws and authorities
 - E.g. Section 106 consultation, 8-Step Process
 - You may make suggestions and initial analysis, but HUD will make final determinations
 - To ensure that HUD reviews each related law and authority, Partners may *not* reply to the final question on each screen ("Are formal compliance steps or mitigation required?")
- **However**, HEROS requires that each screen be fully complete before you can upload documents
 - Respond to all questions using your best suggestions for HUD
 - In the compliance determination box, explain your actions and suggestions
 - Be explicit about which responses are final and which are advisory
 - HUD will complete these screens using your feedback

Wetlands Protection

If project involves ground disturbance:

- Use the [National Wetlands Inventory](#) as a preliminary screening tool to determine whether the site contains a wetland
- If so, consult with HUD to determine whether to consult with US Fish and Wildlife or complete a wetlands delineation survey
- If 8-Step Process is required, coordinate with HUD: only HUD may complete the 8-Step Process

Endangered Species

Partners should not contact the US Fish and Wildlife Service or NOAA Fisheries.

- If consultation is required, Partners should coordinate with HUD.

Historic Preservation

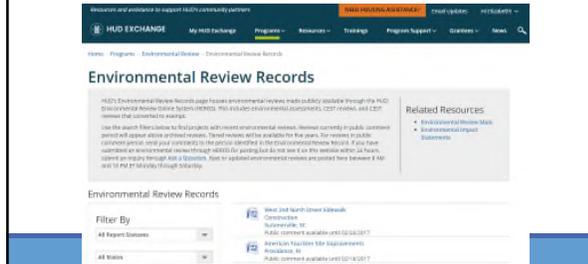
Partners should not contact State Historic Preservation Officers (SHPOs) or Tribal Historic Preservation Officers (THPOs)

- Make a preliminary suggestion regarding the consulting parties and the effects determination
- Describe your conclusions
- If the project includes ground disturbance or is in or near a historic building or a historic district, coordinate with HUD as soon as possible

Posting to the HUD Exchange

Completed environmental reviews will be archived on HUD Exchange for a year.

<https://www.hudexchange.info/environmental-review/environmental-review-records/>



Registering for HEROS

- If you do not have HEROS access, follow the instructions provided to register



Tools and Resources

HEROS Resources

Training materials on the HUD Exchange include:

- User Guide: <https://www.hudexchange.info/resource/3150/heros-user-guide>
- How-To Videos: <https://www.hudexchange.info/resource/3848/heros-e-tutorials/>
- FAQs: <https://www.hudexchange.info/heros/faqs>
- HUD Exchange "Ask A Question": <https://www.hudexchange.info/program-support/my-question/>
- Live Q&A Webinars
- HEROS Worksheets: <https://www.hudexchange.info/resource/5119/environmental-review-record-related-federal-laws-and-authorities-partner-worksheets/>

Materials are available at: <https://www.hudexchange.info/environmental-review/heros>



Environmental Resources

HUD Exchange

<https://www.hudexchange.info/programs/environmental-review/>

Environmental Review

Welcome to the official website for the Department of Housing and Urban Development's (HUD's) Office of Environment and Energy. The Office of Environment and Energy (OEE) manages the environmental review process for HUD.

An environmental review is the process of reviewing a project and its potential environmental impacts to determine whether it meets federal, state, and local environmental standards. The environmental review process is required for all HUD-assisted projects to ensure that the proposed project does not negatively impact the surrounding environment and that the property site itself will not have an adverse environmental or health effect on end users. Not every project is subject to a full environmental review (i.e., every project's environmental impact must be examined, but the extent of this examination varies), but every project must be in compliance with the National Environmental Policy Act (NEPA), and other related Federal and state environmental laws.

Orientation to Environmental Reviews

Explore the components of an environmental review. This section contains information pertaining to both Part 50 and Part 58 reviews.

Related Federal Environmental Laws and Authorities

Learn about the environmental requirements covered by related federal laws and authorities and referenced in HUD's regulations at 24 CFR 58.4, 58.5, and 58.6. Each environmental topic features a compilation of resources such as training, guidance, and useful websites. This section contains all of the content from the Assessment and Remediation Compliance (ARCC).

Featured Topics

- HUD Environmental Regulations
- Environmental Assessments
- Disaster Recovery and Environment
- Environmental Review Training Webinars
- HUD Environmental Review Online System (HEROS)

[View Resources](#)

WISER Modules

Getting Started (Part 50 and Part 58)	Environmental Justice
Tools and Resources	Environmental Assessment Factors/Site Planning
Airport Hazards	Explosive and Flammable Facilities
Endangered Species	Wild & Scenic Rivers
Noise Abatement and Control	Farmland
Water Elements	Air Quality
• Floodplain Management	Historic Preservation: The Section 106 Process
• Flood Insurance	Site Contamination
• Coastal Barrier Resources	
• Coastal Zone Management	
• Sole Source Aquifers	
• Wetlands	

Program Environmental Resources

2016 MAP Guide:

<https://www.hud.gov/sites/documents/4430GHSGG-BM.PDF>

Environmental Review Requirements for RAD Transactions:

<https://www.hudexchange.info/resources/documents/Environmental-Review-Requirements-for-RAD-Transactions.pdf>

HEROS Quick Links

OEE on the HUD Exchange:

<https://www.hudexchange.info/environmental-review/>

HEROS on the HUD Exchange:

<https://www.hudexchange.info/environmental-review/heros/>

FAQs: <https://www.hudexchange.info/heros/faqs>

Log into HEROS: <https://heros.hud.gov/>

Questions?

Technical questions about HEROS should go to Ask A Question at <https://www.hudexchange.info/get-assistance/my-question/>.

Project-specific or environmental review questions should go to your HUD Program contact.
