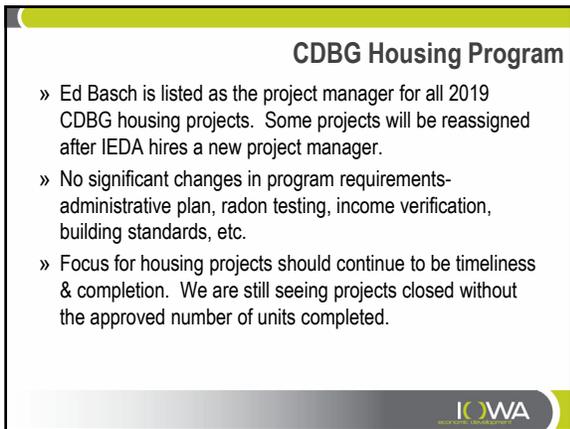
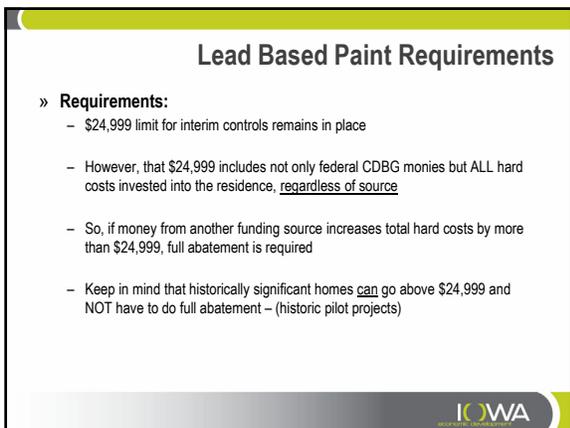




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Environmental Compliance

» Housing Rehabilitation Projects

- » Environmental Review
 - Housing Rehab is typically a CEST level of determination
 - Make Determination, Publish in Paper, Wait for Local Comment Period, Submit Certification & Request for Release of Funds
 - Release of Funds issued by IEDA day after State comment period expires
- » Individual Properties
 - Once you have a specific property identified, complete the individual building review for CEST projects; this includes completion of the CFR 58.5 & 58.6 checklists with documentation
 - For Section 106 of the National Historic Preservation Act – complete the four point approach for individual buildings.

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Section 106 Process

» Four Point Approach For Individual Buildings:

- » All documentation/materials go to IEDA, not SHPO
- » Initiate Section 106 Review Process
 - Identify projects that have the potential to affect cultural resources
- » Identification and Evaluation of Historic Properties
 - Identify the Area of Potential Effects (APE) including sites within, adjacent to and directly or indirectly related to the undertaking which may be affected by the project
 - Evaluate resources within the APE that are listed on or eligible for listing on the National Register of Historic Places (NRHP)

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Section 106 Process

» PA

- » Programmatic Agreement (PA)
 - » Executed August 23, 2016
 - » Valid for all Current and Future CDBG funded projects administered by IEDA except 2008 Disaster Awarded Projects which will continue to comply with the 2008 Disaster PA (as amended).

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- » TA is Open to any current and future CDBG-HSG awards
- » Prepare your Iowa Site Inventory Form (as you do now – form can be found at IEDA’s website under Environmental Compliance: <https://www.iowaeconomicdevelopment.com/Community/downloads> along with other guidance).
- » Share your Draft Iowa Site Inventory Form (with maps, photos, etc.) with Leah. You can do this however is best/easiest for you –
 - send an email,
 - use a shared link
 - drop box, etc.

I know these forms tend to be large so you may need to find ways to share with Leah and her team that work for everyone. Reach out to Leah to make sure she received your document.
- » Tallgrass will review and comment on the form in no more than 10 working days from submittal.
- » The Grant Administrator will incorporate the changes/comments into the form, then upload the final version of the Iowa Site Inventory Form into iowagrants.gov for Tier II/Section 106 compliance.
- » IEDA will review, and ultimately approved the Tier II/Section 106 before any bidding/construction takes place.



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Section 106 Process (continued)

- » Assessing Effects
 - Consult with IEDA, interested and consulting parties and the public
- » Resolve Adverse Effects, (if any)
 - Memorandum of Agreement, which outlines agreed upon measures that the recipient will take to avoid, minimize or mitigate adverse effects
 - Section 106 process cannot actually **stop** a project - but can delay it



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Section 106 Process (continued)

- » 106/Tier II Submittals
 - » Photographs must be integrated into the Iowa Site Inventory Form – separate documents will no longer be accepted.
 - » IEDA prefers PDF documents for ALL uploads.
 - » All submittals must have either:
 - » Signature Authorization Form (per program/city), or
 - » Request for Comment signed by City Official (per address).

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Pilot programs

- » IEDA is not undertaking new pilot projects at this time. Due to limited funds & upcoming program changes.
- » The only exception to this is Historic Preservation Single Family projects that come up under already approved CDBG housing awards.
 - Owner must be LMI-verified and must occupy the residence
 - Property must be determined eligible for or listed in the National Register of Historic Places;
 - Rehab must meet HQS as applied by IEDA and comply with the Secretary of the Interior's Standards for Rehabilitation
 - Coordination with SHPO will determine if full abatement or the use of interim controls in accordance with Lead Safe Housing Regulations 24CFR35.115(13) is required

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Monitoring tips

- » Get the SOFA out of the way just prior to crossing the 50% drawdown threshold
- » Inspector should ideally visit site about once/week during construction and should keep dated, initialed notes for each visit
- » Remember that IEDA will need to see hard copies of forms; files on a computer or phone not sufficient
- » Use the federal provision list from the latest Grant Management Guidebook for all contracts; better to have too much than too little

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Monitoring tips

- » Confirm project visit with homeowner shortly before monitoring date; need to have access to inside of home
- » Don't forget mandatory and optional fair housing action-Included in Appendix 2 of the Management Guide
- » Select a home to visit and track that is totally complete

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PROJECT MANAGEMENT

- » Reminder: Need to submit a draw every 6 months for construction (once started) and administration.
- » Contract amendment requests to increase the original number of units in a project will be considered only if recipient city can demonstrate good project performance and that any additional units can be completed within the 3 year contract period.
- » IEDA may consider requests for additional funds if request meets criteria above AND provided additional funds are available.

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