

Using HEROS as a RAD Partner

The purpose of this document is to provide instructions to third party providers and Public Housing Authorities (PHAs) assisting 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/environmental-review/heros/>. 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.

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/>. If prompted, select the name of your organization as the “Partner” and HUD next to “Responsible Entity or HUD.”



You will be directed to **Screen 1020 – 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 to edit or assign to another user. To start a new review, press the <Start a new environmental review> button in the upper left.

Screen 1101 – Review Type (Non-Tiered)

Make sure you are working with a *non-tiered* review, and that you select **Part 50** so that HUD will be able to complete the review. Then press <Save and Continue> to move on to the next screen.

Screen 1105 – Initial Screen

This screen requests information on the project financing and the parties involved in the project and environmental review. Required fields are marked with a red asterisk.

When completing a RAD review, make the following selections and inputs:

Field	Correct Response
Project Name	Enter the project name that is identified on your RAD CHAP. If there are multiple buildings to be assessed within the CHAP, please also include building name and/or the AMP in the project name on each review.
Grant/Project ID Number	Enter the PIC ID
HUD Program	Select Rental Assistance Demonstration (RAD)
Estimated Total HUD Funded, Assisted, or Insured Amount	Enter 0. The Transaction Manager will enter the final amount.
Estimated Total HUD Project Cost	Enter 0. The Transaction Manager will enter the final amount.
Does this project anticipate the use of funds or assistance from another Federal agency in addition to HUD?	Select “Yes” only if another federal agency (e.g. FEMA, EPA) is contributing funds to this project. Do <i>not</i> select “Yes” if the project is applying for LIHTC. The response will typically be “No” for RAD projects.
Does this project involve over 200 lots, dwelling units, or beds?	Select Yes or No
Applicant/Grant Recipient Information	Search for the Housing Authority by name and/or location. Enter point of contact representing the PHA.
HUD Preparer	Provide the name of your Transaction Manager. If your Financing Plan TM is not yet known, enter “TBD.”
Consultant Information	If you are a consultant or contractor, enter the name of your firm and your name

Screen 1125 – Project Summary

When completing a RAD review, make the following selections and inputs:

Field	Correct Response
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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
What activities are involved in the project?	Select all planned or anticipated activities
Will the project require a change in land use?	Select "Yes" if the project will involve converting a non-residential structure to a residential use. Otherwise, select "No"
What is the planned use of the affected property?	Select Residential building(s) > Multifamily

You should also upload site maps, photographs, and other documents that will help HUD understand the project description here.

Screen 1315 – Level of Review

On this screen, you will make a **preliminary** selection regarding the required level of environmental review based on the project description and activities involved. The final decision will be made by HUD. If you have any questions about the appropriate level of review, contact your TM.

There are 4 possible selections on this screen:

1. Categorically excluded **not** subject to the federal laws and authorities cited in 24 CFR 50.4 (CENST)
 - This selection is never appropriate for RAD transactions.
2. Categorically excluded **subject to** the federal laws and authorities cited in 24 CFR 50.4 (CEST)
 - This selection is appropriate if all anticipated activities are listed in an exclusion in 24 CFR 50.20(a). RAD transactions are CEST if they do not include any repairs or rehabilitation, or if all rehabilitation conforms to the requirements in 24 CFR 50.20(a)(2)(ii):
 - Unit density is not changed more than 20 percent;
 - The project does not involve changes in land use from residential to non-residential; and
 - The estimated cost of rehabilitation is less than 75 percent of the total estimated cost of replacement after rehabilitation.
3. Environmental Assessment (EA)

- This selection is appropriate for transactions that anticipate any rehabilitation activities that do *not* conform to the requirements in 24 CFR 50.20(a)(2)(ii) and/or *any* new construction or demolition activities.
4. Environmental Impact Statement (EIS)
- An EIS is required if the project impacts more than 2,500 units or if it has been determined to have a potentially significant impact on the human environment. If you suspect an EIS may be required, contact the TM immediately.

Screen 2005 – Related Federal Laws and Authorities Summary

This screen lists all of the related laws and authorities that must be complied with for this transaction based on the level of review. Click on the name of each law and authority in the left column to navigate to the individual screen for each law and authority.

Within each individual screen, respond to the series of questions to determine whether the project complies (or can, with mitigation, comply) with that law or authority. After selecting each response, press the <Next> button to move on to the next screen. When you have completed all required questions, you will be directed to the “Screen Summary” to summarize compliance. A compliance determination will be automatically generated; you should use this space to add any further analysis or discussion to clarify your conclusions. You may also want to include notes to the HUD staff who will be responsible for completing the review in this space. Your notes should clearly state any recommendations you have for HUD and any areas where HUD will have to take additional steps to comply with all requirements.

Note: HUD will review and evaluate all your responses and documentation and complete all compliance steps as needed. As a Partner, not a HUD employee, you will not be able to complete the full analysis for all laws and authorities. For example, Partners should not write to tribes as part a Section 106 consultation under the National Historic Preservation Act, start a Section 7 consultation under the Endangered Species Act, or finalize the 8-Step Process under Part 55. Similarly, you may suggest mitigation measures or project improvements, but the final decision will be HUD’s.

However, it is necessary to fully respond to all questions on each screen before you will be able to upload documentation. Therefore, where you have documentation to upload, but you are not legally able to comply with all requirements, please respond to all questions using your best guesses and suggestions to HUD. Use the compliance determination to explain what actions you took and your suggested course of action to HUD. Your compliance determination should make it clear to HUD which responses are final and which are only advisory. HUD will complete the screen using your feedback.

Notes on completing individual laws and authorities

Compliance Factor	How to complete as a Partner
Historic Preservation	HUD must review the project and make a finding of effect. Partners may assist HUD in making its historic preservation determinations by assembling information for HUD’s Section 106 review, including studies, historic property surveys, and other documents as necessary. In HEROS, Partner users should make preliminary recommendations regarding the consulting parties and determinations of eligibility and effect and document their conclusions. Partners may request technical assistance from the State Historic Preservation Officer (SHPO) to

	<p>identify historic properties but should not initiate consultation or include a determination of effect when contacting the SHPO.</p> <p>Partners should not contact tribes for any reason.</p> <p>If the project includes ground disturbance or is in or near a listed or eligible historic building or a historic district, coordinate with HUD as soon as possible and prevent any action from being taken prior to HUD’s completion of Section 106 consultation.</p>
Floodplain Management	<p>Partners should create a FIRMette with the site marked and identify whether the project site contains any wetlands. Partners should make a preliminary suggestion as to whether an exception in 24 CFR 55.12 applies.</p> <p>If the 8-Step or 5-Step Process is required, Partners should work with HUD to complete that process. Partners should not conduct any part of the 8- or 5-Step Process without first consulting with HUD.</p> <p>The MAP Guide has additional requirements for projects located in floodplains, and projects must consider offsite floodways and other flood hazards.</p>
Wetlands Protection	<p>For projects involving ground disturbance, Partners should use the National Wetlands Inventory as a preliminary screening tool to determine whether the site contains a wetland. If the site contains a wetland, Partners should consult with HUD to determine whether to consult with US Fish and Wildlife or complete a wetlands delineation survey. If the 8-Step Process is required, coordinate with HUD.</p>
Endangered Species Act	<p>Partners should not contact the US Fish and Wildlife Service or NOAA Fisheries. If consultation is required, Partners should coordinate with HUD.</p>
Toxics and Contamination	<p>In lieu of a Phase I Environmental Site Assessment (ESA) in accordance with ASTM E 1527-13 (or the most recent edition), except for conversions involving substantial rehabilitation or new construction activities, RAD projects may submit a more limited report on potential sources of contamination. In these cases, the project can submit a “transaction screen” in accordance with ASTM E 1528-14 (or the most recent edition).</p> <p>If any potential environmental concerns are identified, an ASTM Phase I ESA in accordance with ASTM E 1527-13 (or the most recent edition) must be provided and mitigation must follow MAP Guide Chapter 9 requirements.</p>
Housing Requirements	<p>RAD projects must complete the HEROS Housing Requirements Screen. RAD projects are not required to follow the MAP Guide on radon testing requirements, but HUD strongly recommends testing for all projects and mitigation of any structures with elevated radon (4 pCi/L or above).</p>

Screen 5000 – Mitigation Measures and Conditions

If the project will require any mitigation measures, you will be prompted to enter a mitigation plan, detailing responsibilities for completing any required mitigation measures. As Partners may not be equipped to provide this information, you may enter “Placeholder” in this textbox in order to proceed to the next screen.

Screen 6205 – Preparer Notification Screen

Following Screen 5000, Partners will be directed to the Preparer Notification screen. On this screen, you may generate a preview of the Environmental Review Record (ERR) to review your work. Save and upload a copy to the RAD Resource Desk as part of your Financing Plan. (This step is crucial, as there is a high potential for HUD staff to accidentally delete all the text you enter in the compliance determinations. The ERR will preserve a record of your instructions and suggestions for HUD in case the text is lost on the screen itself.)

At this point, your preparation may pause until a RAD Financing Plan Transaction Manager (FTM) is assigned. Once you know who your assigned FTM is, please login to HEROS and navigate to this screen within the environmental review record. Then, select the red <Assign Review> button above the side menu to assign the review to HUD.

Assign Review Screen

As stated above, after generating a preview of the Environmental Review Record (ERR) and uploading it to the RAD Resource Desk, you are able to assign a review to a RAD Financing Plan Transaction Manager (FTM).

Once the FTM is assigned to your transaction via the RAD Resource Desk, your FTM will reach out to begin the process of reviewing your Financing Plan. An integral step in this process is assigning the review to your FTM in HEROS so that they may complete the environmental review.

Before assigning the review, confirm with the Transaction Manager that they are available to receive the review. Once the review has been assigned to another person, you will not be able to reassign it to a different user without assistance from a system administrator.

Search for the Transaction Manager by first and/or last name. Their name should appear in the upper table along with their role (HUD), email address, and location. Be sure to select the appropriate name so that it is highlighted in dark gray. Enter any comments in the textbox provided, and press <Assign.> Both you and the new assigned user will receive a confirmation email.

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