

Levels of Environmental Review for ESG Components

Levels of environmental review:

EXEMPT : *Subject to §58.6*

CENST : *Categorically Excluded, Not Subject to §58.5 (Still subject to §58.6)*

CEST : *Categorically Excluded, Subject to §58.5 (Also subject to §58.6)*

EA : *Environmental Assessment (May require an Environmental Impact Statement (EIS) if any conditions in §58.37 apply; also subject to §58.6)*

** Where the Level of Environmental Review is labeled as "EXEMPT or CENST" the responsible entity has the discretion to determine whether the activity is more appropriately categorized as an activity listed at §58.34(a)(4) (Exempt) or §58.35(b)(2) (CENST).*

ESG Components and Activities	Level of Environmental Review	Applicable Part 58 Citations
STREET OUTREACH (24 CFR 576.101)		
Engagement, case management, emergency health services, emergency mental health services, transportation	EXEMPT or CENST*	§58.34(a)(4) or §58.35(b)(2)
EMERGENCY SHELTER (24 CFR 576.102)		
Essential services	EXEMPT or CENST*	§58.34(a)(4) or §58.35(b)(2)
Shelter operations (except rent and repairs)	CENST	§58.35(b)(3)
Repairs ¹ , minor rehabilitation ²	CEST (If your emergency shelter project includes repairs or minor rehabilitation, the level of environmental review increases to CEST.)	§58.35(a)(3)(iii)
Rent (leasing emergency shelter space)	CEST (If your emergency shelter project includes rent (leasing), the level of environmental review increases to CEST.)	§58.35(a)(5)
Major rehabilitation and conversion	EA (Required for rehabilitation projects that result in a change in land use (e.g., from industrial to emergency shelter), will change the size or capacity by more than 20 percent, or where the estimated cost of rehabilitation is more than 75% of the total estimated cost of replacement after rehabilitation.)	§58.36
URA assistance	The environmental review for these costs should be included as part of the review of the activity that caused the displacement.	
HOMELESSNESS PREVENTION & RAPID RE-HOUSING (24 CFR 576.103 - .106)		
Housing Relocation and Stabilization Services - Services costs	EXEMPT or CENST*	§58.34(a)(4) or §58.35(b)(2)
Housing Relocation and Stabilization Services - Financial assistance costs	CENST	§58.35(b)(2)
Tenant-based rental assistance	CENST	§58.35(b)(1)

ESG Components and Activities	Level of Environmental Review	Applicable §58 Citations
HOMELESSNESS PREVENTION & RAPID RE-HOUSING (24 CFR 576.103 - .106) - continued		
Project-based rental assistance ³	CEST (If your homelessness prevention or rapid re-housing project includes project-based rental assistance, the level of environmental review increases to CEST.)	§58.35(a)(5)
Leasing office space	CEST (If your HP or RRH project includes leasing office space, the level of environmental review increases to CEST.)	§58.35(a)(5)
HMIS (24 CFR 576.107)		
TA, Salaries for HMIS administrators	EXEMPT	§58.34(a)(9); §58.34(a)(3)
Purchasing/leasing equipment, Utilities, Travel for TA	CENST	§58.35(b)(3)
Leasing office space	CEST (If your HMIS project includes leasing office space, the level of environmental review increases to CEST.)	§58.35(a)(5)
ADMINISTRATIVE ACTIVITIES (24 CFR 576.108)		
TA, general management/oversight/coordination (except office equipment)	EXEMPT	§58.34(a)(9); §58.34(a)(3)
Consolidated plan, environmental review	EXEMPT	§58.34(a)(1)
Office equipment	CENST	§58.35(b)(3)
Leasing office space	CEST (If your admin costs include leasing office space, the level of environmental review increases to CEST.)	§58.35(a)(5)
<u>Repairs, maintenance, and minor rehabilitation are being defined for the purposes of ESG environmental review only; major rehabilitation is being re-defined for the purposes of ESG environmental review only.</u>		
<p>¹ "Repairs" should be distinguished from maintenance activities, which are categorized as CENST under §58.35(b)(3). Unlike repairs and improvements, maintenance activities do not materially add to the value of the building, appreciably prolong its useful life, or adapt it to new uses, and may include cleaning, protective or preventative measures, and replacement of appliances and objects that are not fixtures. Repairs are included within 'minor rehabilitation' for environmental review purposes.</p>		
<p>² "Minor rehabilitation:" for the purposes of ESG environmental review, minor rehabilitation is considered rehabilitation of public facilities where the facility is in place and will be retained in the same use without change in size or capacity of more than 20% and where the cost of rehabilitation is less than 75% of the cost of replacement after rehabilitation.</p>		
<p>³ "Project-based rental assistance:" defined as rental assistance that is attached to a residential unit, not to a tenant. For example, a review would be required if the recipient or subrecipient enters into a contract with a housing owner to provide rental assistance for one or more vacant units that the owner promises to lease to program participants.</p>		