



Part 58 Environmental Review Checklist for HOME-ARP Projects

All HOME Investment Partnerships American Rescue Plan Program (HOME-ARP)-assisted projects are required to complete an environmental review (ER) to evaluate all environmental impacts on a potential project site. The review includes analysis of both how the project can affect the environment and how the environment can affect the project, site, and end users. HOME-ARP funds may be used to acquire and/or rehabilitate or construct HOME-ARP non-congregate shelter units to serve qualifying populations. Acquisition of vacant land or demolition of existing structures may be undertaken only as part of a HOME-ARP non-congregate shelter (NCS) project.

The United States Department of Housing and Urban Development's (HUD's) regulations at 24 CFR 58.22 prohibit grant recipients and their partners from committing or spending HUD or non-HUD funds on any activity that could have an adverse environmental impact or limit the choice of reasonable alternatives prior to completion of an environmental review once a project has become federal. This includes all physical activities, including acquisition, rehabilitation, and construction, as well as contracting for or committing to any of these actions. HUD also strongly encourages the use of HUD's Environmental Review Online System (HEROS) to complete your review. For instructions on using the checklist, please refer to the list below:

ER Checklist

This checklist covers the information needed to write the project description and whether or not aggregation principles apply to the project. Each line contains an element that must be covered in the project description.

Determining Level of Review

This checklist covers all five levels of review and provides activity types for each level. The process is duplicated in HEROS and preparers can utilize the tool in HEROS for assistance with choosing the correct level of review.

Related Laws and Authorities

This checklist provides the basic steps required to review each related law or authority for an ER. You can click on the links to take you to additional resources on the HUD Exchange website for each section.

Section 106 Checklist

This checklist should be used when the project activity necessitates the completion of the Section 106 consultation process, which includes the tribal consultation process and the State Historic Preservation Officer (SHPO) consultation process.

Overall Checklist

Grantees should use this checklist to determine whether or not they have successfully completed the steps of the ER.

ER Checklist

Define the project	Yes	No
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Does the description include:

1. Purpose of the proposed project
2. Location
3. Size of the parcel and building
4. Existing condition
5. Trends—economic, demographics
6. Scope of work to be performed, including all related project activities, regardless of funding source
7. Changes that will be made to the structure/land
8. Beneficiaries—numbers, types
9. Benefits of and impact to the community
10. Funding sources
11. HUD-funded amount and total project cost
12. Estimated project timeline

Aggregation:

Is this activity part of a larger project?

Is the site just one phase of a larger development, or do additional phases of the project have funding in place or plans beyond the preliminary

Are there multiple activities planned for the same site or target area?

If yes to any of the above, aggregation is required.



Determining Level of Review

Please select all applicable project activities from the checklist below. The highest level of review that applies to a project activity when considering the aggregated project will determine the level of Environmental Review required for the full scope of the project. All HUD-assisted projects require some level of Environmental Review, even projects that only include exempt activities.

58.34(a) Exempt

The exempt activities set forth at 24 CFR 58.34 deal mainly with actions that do not have a physical component. They are generally planning activities, administration, and services, including:

58.34(a) Exempt	Yes	No
Environmental and other studies, resource identification, and the development of plans and strategies. 24 CFR 58.34(a)(1)		
Information and financial services. 24 CFR 58.34(a)(2)		
Administrative and management activities. 24 CFR 58.34(a)(3)		
Inspections and testing of properties for hazards or defects. 24 CFR 58.34(a)(5)		
Purchase of insurance. 24 CFR 58.34(a)(6)		
Purchase of tools. 24 CFR 58.34(a)(7)		
Engineering or design costs. 24 CFR 58.34(a)(8)		
Assistance for temporary or permanent improvements that do not alter environmental conditions and are limited to protection, repair, or restoration activities necessary only to control or arrest the effects from disasters or imminent threats to public safety, including those resulting from physical deterioration. 24 CFR 58.34(a)(10)		
Payment of principal and interest on loans made or obligations guaranteed by HUD. 24 CFR 58.34(a)(11)		

Determining Level of Review, *CONTINUED*

58.35(b) Categorically Excluded, Not Subject to 58.5 (CENST)

CENST activities listed in 24 CFR 58.35(b) are similar to exempt activities—they are generally activities that will not have physical impacts on the environment. Activities in this category include:

58.35(b) Categorically Excluded, Not Subject to 58.5 (CENST)	Yes	No
Tenant-based rental assistance. 24 CFR 58.35(b)(1)		
Supportive services including, but not limited to, health care, housing services, permanent housing placement, day care, nutritional services, short-term payments for rent/mortgage/utility costs, and assistance in gaining access to local, state, and federal government benefits and services. 24 CFR 58.35(b)(2)		
Operating costs including maintenance, security, operation, utilities, furnishings, equipment, supplies, staff training and recruitment, and other incidental costs. 24 CFR 58.35(b)(3)		
Economic development activities, including but not limited to, equipment purchase, inventory financing, interest subsidy, operating expenses, and similar costs not associated with construction or expansion of existing operations. 24 CFR 58.35(b)(4)		
Activities to assist homebuyers to purchase existing dwelling units or dwelling units under construction, including closing costs and down payment assistance, interest buydowns, and similar activities that result in the transfer of title. 24 CFR 58.35(b)(5)		
Affordable housing pre-development costs including legal, consulting, developer, and other costs related to obtaining site options, project financing, administrative costs and fees for loan commitments, zoning approvals, and other related activities that do not have a physical impact. 24 CFR 58.35(b)(6)		
Approval of supplemental assistance. 24 CFR 58.35(b)(7). This activity is CENST Supplemental Assistance if the approval is made by the same responsible entity that conducted the environmental review on the original project and reevaluation of the environmental findings is not required under Sec. 58.47.		

Determining Level of Review, *CONTINUED*

58.35(a) Categorically Excluded and Subject To Review With 58.5 (CEST)

Activities that are categorized as CEST will usually have physical impacts to the environment. They are specifically defined in 24 CFR 58.35(a) and include:

58.35(a) Categorically Excluded and Subject To Review With 58.5 (CEST)	Yes	No
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Acquisition or leasing

Acquisition of public facilities. 24 CFR 58.35(a)(1). Acquisition of vacant land, provided that the acquired land will be retained for the same use. 24 CFR 58.35(a)(5)

Acquisition (including leasing) of an existing structure, provided that the acquired structure will be retained for the same use. 24 CFR 58.35(a)(5)

Americans with Disabilities Act (ADA) compliance.

Special projects directed to the removal of material and architectural barriers that restrict the mobility of and accessibility to elderly and handicapped persons. 24 CFR 58.35(a)(2)

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Repair, improvement, reconstruction, or rehabilitation

Rehabilitation of public facilities and improvements other than buildings. 24 CFR 58.35(a)(1). This activity is CEST if the facilities and improvements are in place and retained in the same use without change in size or capacity of more than 20 percent. Acceptable activities include replacement of water or sewer lines, reconstruction of curbs and sidewalks, and repaving of streets.

Rehabilitation of residential buildings with one to four units. 24 CFR 58.35(a)(3)(i). This activity is CEST if the density is not increased beyond four units, the land use is not changed, and the footprint of the building is not increased in a floodplain or wetland.



Determining Level of Review, *CONTINUED*

58.35(a) CEST <i>CONTINUED</i>	Yes	No
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Repair, improvement, reconstruction, or rehabilitation

Rehabilitation of multifamily (five or more units) residential buildings. 24 CFR 58.35(a)(3)(ii). This activity is CEST if 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.

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Rehabilitation of non-residential structures including commercial, industrial, and public buildings. 24 CFR 58.35(a)(3)(iii). This activity is CEST if the facilities and improvements are in place and will not be changed in size or capacity by more than 20 percent and the activity does not involve a change in land use, such as from non-residential to residential, commercial to industrial, or from one industrial use to another.

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Individual actions

Individual actions may refer to new construction, development, demolition, acquisition, disposition, or refinancing. However, it would not apply to activities that involve repair, improvement, reconstruction, or rehabilitation. See [HUD Basically CDBG, Chapter 15 Environmental Review, Section 15.1.7 \(page 15-6\)](#).

An individual action on up to four dwelling units. 24 CFR 58.35(a)(4) (i). This activity is CEST where there is a maximum of four units on any one site. The units can be four one-unit buildings or one four-unit building or any combination in between.

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An individual action on a project of five or more housing units. 24 CFR 58.35(a)(4)(ii). This activity is CEST when the housing units are developed on scattered sites, the sites are more than 2,000 feet apart, and there are not more than four housing units on any one site.

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Determining Level of Review, *CONTINUED*

58.35(a) CEST <i>CONTINUED</i>	Yes	No
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Disposition

Disposition of an existing structure provided that the disposed of structure will be retained for the same use. 24 CFR 58.35(a)(5)

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Equity loans

Equity loans on an existing structure provided that the financed structure will be retained for the same use. 24 CFR 58.35(a)(5)

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Determining Level of Review, *CONTINUED*

58.36 Environmental Assessment

If a project cannot be categorized as exempt or categorically excluded as previously described, then a NEPA environmental assessment (EA) must be prepared. In general, projects that require an EA are those that involve new construction, changes in land use, and major reconstruction or expansion of the existing facilities (generally above a 20 percent increase).

58.36 Environmental Assessment	Yes	No
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Common activities that would trigger the need for an EA may include, but are not limited to:

New construction of five or more residential housing units that are less than 2,000 feet apart.

Construction of new social service, community, or senior center or health clinic.

Construction of a new fire station or library.

Construction of a new water or wastewater system including new water wells, storage facilities, treatment plants, and transmission lines.

Water or sewer line extensions (vs. replacements) and new hook-ups/tie-ins.

Construction of new drainage or flood control facilities.

Construction of new streets or substantial reconstruction to include widening by 20 percent or more. Construction of new industrial or commercial facilities or significant expansions of such (even if the actual construction or expansion is privately financed and LHC funds are used only for equipment purchase or design/engineering costs).

Land acquisition or demolition (of more than four units) if there is a change in land use.



Related Laws and Authorities

This checklist only provides the basic steps required to review each related law or authority for an ER. Click on the links to visit the HUD Exchange website for additional resources on how to comply with each law and authority.

STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 58.6	Yes	No
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Airport Hazards

[Clear Zones and Accident Potential Zones; [24 CFR Part 51 Subpart D](#)]

Is the project within 15,000 feet of a military airport or 2,500 feet of a civilian airport?

Was documentation provided?

Are formal compliance steps or mitigation required?

Coastal Barrier Resources

[Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [\[16 USC 3501\]](#)]

Is the project located in a Coastal Barrier Resources System (CBRS) unit?

Engineering or design costs. 24 CFR 58.34(a)(8)

Are formal compliance steps or mitigation required?

Flood Insurance

[Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [\[42 USC 4001-4128 and 42 USC 5154a\]](#)]

Does this project involve mortgage insurance, refinance, acquisition, repairs, rehabilitation, or construction of a structure, mobile home, or insurable personal property?

Will insurance be required as a mitigation measure or condition?

Was documentation provided?

Are formal compliance steps or mitigation required?



Related Laws and Authorities, *CONTINUED*

STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 58.5	Yes	No
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Air Quality

[Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93]

Does your project include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units?

Was documentation provided?

Are formal compliance steps or mitigation required?

Coastal Zone Management

[Coastal Zone Management Act, sections 307(c) & (d)]

Is the project located in, or does it affect, a Coastal Zone as defined in your state Coastal Management Plan?

Was documentation provided?

Are formal compliance steps or mitigation required?

Contamination and Toxic Substances - Multifamily and Nonresidential Properties

[24 CFR 50.3(i) & 58.5(i)(2)] (HUD Standard)

Were any on-site or nearby toxic, hazardous, or radioactive substances found that could affect the health and safety of project occupants or conflict with the intended use of the property?

Was documentation provided?

Are formal compliance steps or mitigation required?



Related Laws and Authorities, *CONTINUED*

STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 58.5 *CONTINUED*

Yes

No

Endangered Species

[Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402]

Does the project involve any activities that have the potential to affect species or habitats?

Was documentation provided?

Are formal compliance steps or mitigation required?

Explosive and Flammable Hazards

(Above-Ground Tanks)[24 CFR Part 51 Subpart C]

Is the proposed HUD-assisted project itself the development of a hazardous facility?

Does this project include any of the following activities: development, construction, rehabilitation that will increase residential densities, or conversion?

Was documentation provided?

Are formal compliance steps or mitigation required?

Farmlands Protection

[Farmland Protection Policy Act of 1981, particularly sections 1504(b) & 1541; 7 CFR Part 658]

Does your project include any activities, including new construction, acquisition of undeveloped land or conversion, that could convert agricultural land to a non-agricultural use?

Was documentation provided?

Are formal compliance steps or mitigation required?



Related Laws and Authorities, *CONTINUED*

STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 58.5 <i>CONTINUED</i>	Yes	No
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Floodplain Management

[Executive Order 11988, particularly section 2(a); 24 CFR Part 55]

Do any exceptions apply?

Does the project occur in a floodplain?

Was documentation provided?

Are formal compliance steps or mitigation required?

Historic Preservation

[National Historic Preservation Act of 1966, particularly sections 106 & 110; 36 CFR Part 800]

Is Section 106 Review required for your project?

If so, was the Section 106 Supplemental Checklist completed?

Was documentation provided?

Are formal compliance steps or mitigation required?

Noise Abatement and Control

[Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B]

Does your project involve new construction or rehabilitation of an existing property?

Are there potential noise generators in the vicinity of the project?

Was the noise found to be Acceptable, Normally Unacceptable, or Unacceptable?

Was documentation provided?

Are formal compliance steps or mitigation required?



Related Laws and Authorities, *CONTINUED*

STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 58.5 *CONTINUED*

Yes

No

Sole Source Aquifers

[Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149]

Does the project consist solely of acquisition, refinance, insurance, leasing, repairs, or rehabilitation of an existing building or building(s)?

Is the project located on a sole source aquifer (SSA)?

Was documentation provided?

Are formal compliance steps or mitigation required?

Wetlands Protection

[Executive Order 11990, particularly sections 2 & 5]

Does this project involve new construction as defined in Executive Order 11990, expansion of a building's footprint, or ground disturbance?

Will the new construction or other ground disturbance impact an on- or off-site wetland?

Was an 8-step process required?

Was documentation provided?

Are formal compliance steps or mitigation required?

Wild and Scenic Rivers

[Wild and Scenic Rivers Act of 1968, particularly section 7(b) & (c)]

Is the project in proximity of a National Wild and Scenic Rivers System (NWSRS) river?

Was documentation provided?

Are formal compliance steps or mitigation required?



Related Laws and Authorities, *CONTINUED*

STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 58.5 *CONTINUED*

Yes

No

Environmental Justice [Executive Order 12898]

Were any adverse environmental impacts identified in any other compliance review portion of this project's total ER?

Was documentation provided?

Are formal compliance steps or mitigation required?

Section 106 Checklist

Section 106 (SHPO Review)	Yes	No
Has the National Historic Preservation Act, Section 106 Review been initiated?		
Is the project exempt for further Section 106 review because it consists solely of activities listed as exempt in an existing Programmatic Agreement (PA)? (If yes, no further Section 106 review is needed.)		
Does the project meet the definition of an “undertaking” and have potential to cause effects on historic properties?		
Have consulting parties been identified? Is there a plan to involve public notice?		
To identify Tribes to consult with, was the "When To Consult Tribes Checklist" utilized?		
Were Tribes identified using the Tribal Directory Assessment Tool (TDAT)?		
Were identified tribes notified and offered an opportunity to comment? If a Tribe was notified but did not respond, is that noted in the ERR?		
Is the subject property or any properties in the area of potential effect (APE) listed or eligible to be listed in the National Register of Historic Places? Have consulting parties been asked for information about historic properties in the APE?		
Is there consensus with SHPO about whether historic properties lie within the APE?		
If historic properties lie within the APE, will or might the action adversely affect historic properties?		

Section 106 Checklist, *CONTINUED*

Section 106 (SHPO Review) <i>CONTINUED</i>	Yes	No
<p>Is there a determination of adverse effect? Were consulting parties, such as Indian Tribes, notified? Did SHPO object to the "no adverse effect" determination? If there is an adverse effect, continue the review to resolve the adverse effect. If there is an adverse effect, notify the Advisory Council on Historic Preservation (ACHP) to determine if the ACHP will participate in the resolution of adverse effects.</p>		
<p>For resolving adverse effects: Did the grantee prepare a case report evaluating alternatives, avoidance and mitigation strategies, and acceptance of effects and develop a memorandum of agreement (MOA) with the SHPO?</p>		
<p>Has resolution of adverse effects been memorialized in a signed MOA, which has been filed with the ACHP and included in the environmental review record (ERR)?</p>		
<p>Did the grantee carry out actions in accordance with the time frames and stipulations established by the MOA?</p>		
<p>Does the grantee maintain documentation of all stages of the Section 106 review in its ERR?</p>		

Section 106 (THPO Review)	Yes	No
<p>NHPA, Section 106 reviews on Tribal Lands (Reservations). When a Tribal Historic Preservation Officer (THPO) has assumed the responsibilities of a SHPO for purposes of 36 CFR 800, conduct the NHPA, Section 106 Review for projects on Tribal Lands (Reservations) with the THPO, instead of the SHPO. Consultation with THPOs is required when an undertaking is on Tribal lands. Is the project located on a Tribal Reservation?</p>		



Overall Checklist

General	Yes	No
1. For all ERs that required an EA or CEST level of review (that did not convert to exempt), were public notices issued and ERRs made available for public review prior to the submission of the Request for Release of Funds (RROF)?		
2. Has the Related Laws and Authorities Checklist been completed as well as supplying support documentation showing evidence of compliance? Does the documentation support the conclusion and was the checklist signed prior to publishing the Notice of Intent NOI/ RROF public notice, if applicable?		

EXEMPT/Categorically Excluded Not Subject to 58.5 (CENST)	Yes	No
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Activities determined to be statutorily exempt or CENST:

1. Is the finding of exemption correct and documented and is there evidence of compliance with the three laws and authorities at 58.6, which applies to all levels of review?		
2. Was the project considered Exempt because it is categorically excluded and did not require compliance with other federal environmental laws or requirements? Was this fact documented for each law or requirement cited in 24 CFR Part 58.5?		
3. Is the entire "Project" included in the determination, including all related reasonably foreseeable activities as defined by HUD's aggregation principles under 24 CFR Part 58.32?		
4. Was there evidence that the exempt or CENST determination was in place before funds were obligated?		

Overall Checklist, *CONTINUED*

EXEMPT/Categorically Excluded Not Subject to 58.5 (CENST) <i>CONTINUED</i>	Yes	No
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Activity/(ies) Name: _____

Activity/(ies) Name: _____

Activity/(ies) Name: _____

Integrated Disbursement and Information System (IDIS) CPS#:

Categorically Excluded Subject To 58.5 (CEST)	Yes	No
Are the findings of CEST correct and documented?		



Overall Checklist, *CONTINUED*

Categorically Excluded Subject To 58.5 (CEST) <i>CONTINUED</i>	Yes	No
1. For CEST projects that do not convert to exempt: Is the distribution of NOI/RROF documented?		
2. Is the proof of Publication/Posting for Public Notice contained in the ERR? Is there a copy of the public notice, any comments recieved, the RROF (7015.15) on file and signed by the Certifying Officer and dated after expiration of grantee comment period?		
3. Was there evidence that the determination was in place before funds were obligated?		

Activity/(ies) Name: _____

(IDIS) CPS#: _____

4. Is the entire "Project" included in determination (see 24 CFR 58.32 for explanation of aggregation)?

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Overall Checklist, *CONTINUED*

Public Notice and Request for Release of Funds Process	Yes	No
1. Does the public notice:		
a. Provide a timeframe “on or about” when the RROF will be submitted to HUD that is at least one day after the public comment period ends?		
b. State the HUD program for which RROF is requested?		
c. Identify the name of the project?		
d. Provide the description of the project?		
e. Identify the location of the project		
f. List the amount of HUD funds and total project cost?		
g. State that the Responsible Entity (RE) has made an ERR for the project and include a link to the ER in HEROS or a place and time where ERR may be examined and copied?		
h. List address and/or email address of the RE (not Recipient) to whom comments can be submitted?		
i. Provide a public comment period of at least 7 days (10 days if posted) for CEST NOI/RROF? Or, if an EA combined FONSI-NOI/RROF provide a comment period of at least 15 days (18 days if posted)?		
j. Provide date or timeframe until which objections to the RROF can be submitted to HUD?		
k. List all the bases for objections to the RROF and provide the name, address, and email address of the HUD office to which objections may be sent?		
l. State HUD’s correct mailing address and email address where objections can be sent?		
m. Provide the name and title of RE’s Certifying Officer?		
n. Provide a proof of date of publication/posting?		



Overall Checklist, *CONTINUED*

Public Notice and Request for Release of Funds Process <i>CONTINUED</i>	Yes	No
2. Does the RROF Form 7015.15:		
a. Include the HUD program for which funds are being requested?		
b. Include the name and address of the RE in box 5?		
c. Include the name and address of the Recipient in box 7 (if recipient is not RE)?		
d. Include the project description for which the RE is requesting release of funds in box 11?		
e. State in the project description that a tiered ER was completed, and site-specific reviews will be completed once addresses are known, if a specific address was not included in Box 10?		
f. Indicate whether an EIS was/was not required at #4 in the environmental certification section?		
g. Include the signature of RE's designated Certifying Officer?		
h. Include the date of signature by Certifying Officer that is after expiration of public comment period?		
i. Include the signature of authorized representative of the Recipient, if required (i.e., when the Recipient is not the RE)?		
j. Include the date of signature by Recipient's authorized representative that is after expiration of public comment period?		
n. Provide a proof of date of publication/posting?		

Overall Checklist, *CONTINUED*

ENVIRONMENTAL ASSESMENT (EA)	Yes	No
1. Is the EA worksheet complete with documentation to support the conclusion of the project? Was the process and findings documented in the file? Is the EA signed and dated by the preparer?		
2. Were all Related Laws and Authorities property documented?		
3. Was the process and findings documented in the file?		
4. Is the EA signed and dated by the preparer?		

Note: Ensure the steps at 7 and 8 in the CEST section have been followed and answered.

5. Were all EA factors properly completed and determined?
6. Were all EA factors properly completed and determined?
7. Using the checklist on [Page 20](#), were all parts of the public notice completed properly for the combined notice?"
8. Using the checklist on [Page 21](#), was the RROF Form 7015.15 completed properly?"
9. Did HUD provide the completed Authority to Use Grant Funds Form 7015.16 for the project?"
10. Is formal compliance required for this project?
11. Were formal mitigation measures completed for the project?

Overall Checklist, *CONTINUED*

Conclusion	Yes	No
1. Is there source documentation in the grantee file to support compliance with all appropriate federal and state environmental laws?		
2. Based on the available evidence, has the grantee complied with the ER procedures?		

For any issue identified during the review, provide amplification, as necessary, and specify corrective actions the grantee must take to resolve issues. Describe the nature of any technical assistance provided during the review. List any follow-up actions that the ER Preparer should take.

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