

SUPPLEMENTAL GUIDE ON ENVIRONMENTAL REVIEW DOCUMENTATION

COMPLIANCE DOCUMENTATION

The environmental review must contain written evidence of compliance with the federal laws and authorities listed in 24 CFR 58.5, 58.6 and with the National Environmental Policy Act, if applicable. Such documentation must be verifiable, contain relevant base data, and support the findings being made. Some customary forms of documentation are:

- 1. FIELD OBSERVATION.** A site visit that does not usually involve any testing or measurements. Field observation is an important method for initial screening of the issues. However, for some environmental compliance issues it may be inadequate for final evaluation. The written record for field observation should include date of the site visit, pertinent observations, and by whom (name and title) it was conducted.
- 2. PERSONAL CONTACT.** Personal contacts are useful when the individual contacted is an accepted authority on the subject(s) and the interview is documented. Supporting documentation should include the name and title of the person contacted, relevant points of the discussion, and the date of the conversation.
- 3. PRINTED MATERIALS.** These are useful sources of detailed information, such as comprehensive land use plans, maps, statistical surveys, and studies. Information must be current, i.e. not so old that changing conditions make them irrelevant, and must represent accepted methodologies. Citations for the material should include enough information so that an outside reviewer can locate the specific reference.
- 4. REVIEWER'S EXPERIENCE.** The professional judgment of the person making the review can be useful provided their expertise is relevant. The reviewer may have previous knowledge from familiarity with the area, or may have professional background to make judgments about a specific factor. Provide information on the person's qualification in addition to name and position.
- 5. SPECIAL STUDY.** This is a study conducted for an individual factor, and should be performed by a qualified person using accepted methodologies. Some tests are relatively simple to perform but others may require elaborate equipment or personnel with additional expertise. The reviewer is responsible for obtaining assistance from others in order to have the appropriate tests or studies conducted. A copy of the study must be appended or referenced in the environmental review record.
- 6. CONSULTATION WITH OVERSIGHT AGENCIES.** Some regulations require specific consultation procedures to be completed with oversight agencies, such as for historic preservation, or endangered species when major construction activities are to occur. There must be evidence in the record that these procedures were completed.