

# How to Prepare a HUD Worksheet?

For additional information or questions contact HCD's Environmental Services Team at [nepa@hcd.ca.gov](mailto:nepa@hcd.ca.gov) or Ganey Science at [info@ganeysci.com](mailto:info@ganeysci.com).





# Information for Viewing Speaker Notes

- This presentation and the speaker notes will be converted to a PDF and uploaded to HCD's Environmental Review webpage.
- To view the speaker notes you'll need to click on the yellow square in the upper left corner of the PDF.
- The speaker notes will open on the right side of the screen.



## Choice-Limiting Actions (24 CFR 58.22)

Choice-limiting actions are described in [24 CFR Part 58.22\(a\)](#) and **prohibit**:



## Purpose of Worksheets

- Environmental Review worksheets are used to document compliance for 24 CFR Part 58.5 and 58.6 (Federal Laws and Authorities) requirements.
- Copies of the worksheet for each HUD environmental impact category and the supporting documentation must be attached to the environmental review.
- There are two versions of environmental review worksheets, one for Partners and the other for Responsible Entities.



# Responsible Entity Worksheets

If you are a Responsible Entity (a Unit of Local Government), the applicable worksheets are available to download directly on the [HUD Exchange](#).

By clicking on each worksheet link a downloadable file will open for you to save to your computer.



HUD EXCHANGE

## Resource Links

- [Air Quality - Worksheet \(DOCX\)](#)
- [Airport Hazards - Worksheet \(DOCX\)](#)
- [Coastal Barrier Resources - Worksheet \(DOCX\)](#)
- [Coastal Zone Management - Worksheet \(DOCX\)](#)
- [Endangered Species - Worksheet \(DOCX\)](#)
- [Environmental Justice - Worksheet \(DOCX\)](#)
- [Explosive and Flammable Facilities - Worksheet \(DOCX\)](#)
- [Farmlands Protection - Worksheet \(DOCX\)](#)
- [Flood Insurance - Worksheet \(DOCX\)](#)
- [Floodplain Management - Worksheet \(DOCX\)](#)
- [Historic Preservation - Worksheet \(DOCX\)](#)
- [Noise Abatement and Control \(CEST\) - Worksheet \(DOCX\)](#)
- [Noise Abatement and Control \(EA\) - Worksheet \(DOCX\)](#)
- [Site Contamination \(Single Family\) - Worksheet \(DOCX\)](#)
- [Site Contamination \(Multi-Family\) - Worksheet \(DOCX\)](#)
- [Sole Source Aquifers - Worksheet \(DOCX\)](#)
- [Wetlands Protection - Worksheet \(DOCX\)](#)
- [Wild and Scenic Rivers - Worksheet \(DOCX\)](#)





# Partner Worksheets

Environmental Review Partners include those who assist with the environmental review process, but may not legally take responsibility:

- Applicants
- Consultants,
- Contractors,
- Nonprofits, and
- Public housing authorities.

Partner worksheets are located halfway down the [HUD Environment and Energy Laws, Regulations, and Worksheets](#) page.



# Partner Worksheets (cont.)

Listings under 24 CFR 50.4 and 58.6

Issue	Laws, Authorities, and Regulations	Worksheet
Airport Hazards	24 CFR Part 50, Subpart D	<ul style="list-style-type: none"> <li><a href="#">Airport Hazards Partner Worksheet - DOCX</a></li> <li><a href="#">Airport Runway Clear Zones Partner Worksheet - DOCX</a></li> </ul>
Coastal Barrier Resources	Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 (16 U.S.C. 3501)	<ul style="list-style-type: none"> <li><a href="#">Coastal Barrier Resources Act Partner Worksheet - DOCX</a></li> </ul>
Flood Insurance	Flood Disaster Protection Act of 1973, as amended <ul style="list-style-type: none"> <li><a href="#">42 U.S.C. 4001</a></li> <li><a href="#">42 U.S.C. 4106</a></li> </ul> National Flood Insurance Reform Act of 1994 (42 U.S.C. 5154a)	<ul style="list-style-type: none"> <li><a href="#">Flood Insurance Partner Worksheet - DOCX</a></li> </ul>



Click on the links in the “Worksheet” column to download each worksheet



# How to Prepare the Worksheet

1. Determine whether you are considered a “partner” or the “responsible entity” for the project;
2. Download the appropriate worksheets from HUD;
3. Open each necessary worksheet and begin with Question 1;
4. Continue reading and responding to the questions, following the “yes/no” logic;



## How to Prepare the Worksheet (cont.)

5. When all required questions have been answered, you must complete the Worksheet Summary section;
6. The necessary resources to complete the worksheet for each Federal Law and Authority can be found on the [HUD Exchange](#).
7. Include all references used to complete each worksheet to support your answers; and,
8. Submit worksheets to HCD along with all other required documents with the environmental review.



# Example of a Completed Worksheet





**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**  
WASHINGTON, DC 20410-1000

This Worksheet was designed to be used by those “Partners” (including Public Housing Authorities, consultants, contractors, and nonprofits) who assist Responsible Entities and HUD in preparing environmental reviews, but legally cannot take full responsibilities for these reviews themselves. Responsible Entities and HUD should use the RE/HUD version of the Worksheet.

## **Air Quality (CEST and EA) – PARTNER**

<https://www.hudexchange.info/environmental-review/air-quality>

- 1. 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?**

Yes → *Continue to Question 2.*

No → *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Provide any documents used to make your determination.*

- 2. Is your project’s air quality management district or county in non-attainment or maintenance status for any criteria pollutants?**

Follow the link below to determine compliance status of project county or air quality management district:

<http://www.epa.gov/oaqps001/greenbk/>

No, project’s county or air quality management district is in attainment status for all criteria pollutants

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.*

Yes, project’s management district or county is in non-attainment or maintenance status for one or more criteria pollutants. → *Continue to Question 3.*

- 3. Determine the estimated emissions levels of your project for each of those criteria pollutants that are in non-attainment or maintenance status on your project area. Will your project exceed any of the *de minimis* or *threshold* emissions levels of non-attainment and maintenance level pollutants or exceed the screening levels established by the state or air quality management district?**

No, the project will not exceed *de minimis* or threshold emissions levels or screening levels

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Explain how you determined that the project would not exceed *de minimis* or *threshold* emissions.*

Yes, the project exceeds *de minimis* emissions levels or screening levels.

→ Continue to Question 4. Explain how you determined that the project would not exceed *de minimis* or threshold emissions in the Worksheet Summary.

**4. For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.**

[Click here to enter text.](#)

### **Worksheet Summary**

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

### **Include all documentation supporting your findings in your submission to HUD.**

The project would be in an identified non-attainment area for 8-hour ozone. Butte County Air Quality Management District (BCAQMD) has established air quality construction thresholds for the priority pollutants shown in **Table 1**. The CA Air Resource Board recommends the use of California Emissions Estimator Model (CalEEMod) to analyze construction emissions for land use development projects. CalEEMod (version 2022.1, release date April 2022) was used to estimate average daily construction and operational exhaust emissions.

**Table 1. Butte County Air Quality Thresholds**

Pollutant	Construction Threshold	Operational Threshold
ROG	137 lbs/day	25 lbs/day
NOx	137 lbs/day	25 lbs/day
PM <sub>10</sub>	80 lbs/day	80 lbs/day
PM <sub>2.5</sub>	80 lbs/day	80 lbs/day

### ***CalEEMod Results***

Inputs to the model included the construction year, total expected duration, proposed equipment usage, and land-use subtype apartments mid-rise. Other model inputs such as building area, landscape area, and lot acreage were input to the model. Average daily emissions were computed by dividing the total construction emissions by the number of construction days. Based on the CalEEMod results, the projects falls well beneath the thresholds of significance for construction and operational emissions. The detailed results of the CalEEMod emissions model are attached. Based on the results for construction and operational emissions (Table 2 and 3) the project falls well below BCAQMD threshold levels.

**Table 2. Construction Emissions Results**

<b>Criteria Air Pollutant (Threshold of Significance)</b>	<b>ROG (none)<sup>1</sup></b>	<b>NOx (85 lbs/day)<sup>1</sup></b>	<b>Total PM<sub>10</sub> (Exhaust) (80 lbs/day)<sup>1</sup></b>	<b>Total PM<sub>2.5</sub> (Exhaust) (82 lbs/day)<sup>1</sup></b>
Construction Average daily	44.7	17.6	7.99	4.21
Exceedance	No	No	No	No

**Table 3. Operational Emissions Results**

<b>Criteria Air Pollutant (Threshold of Significance)</b>	<b>ROG (65 lbs/day)<sup>1</sup></b>	<b>NOx (65 lbs/day)<sup>1</sup></b>	<b>Total PM<sub>10</sub> (Exhaust) (80 lbs/day)<sup>1</sup></b>	<b>Total PM<sub>2.5</sub> (Exhaust) (82 lbs/day)<sup>1</sup></b>
Operational Average daily	3.46	3.10	1.32	0.29
Exceedance	No	No	No	No

**\*\*Be sure to include as an attachment the CalEEMod results output.\*\***



## References

- HUD Exchange Related Federal Laws and Authorities Worksheets:  
<https://www.hudexchange.info/resource/4707/environmental-review-record-related-federal-laws-and-authorities-worksheets/>
- HUD Environment and Energy Law, Regulations, and Worksheets:  
[https://www.hud.gov/program\\_offices/comm\\_planning/environment\\_energy/regulations#relatedlawsandauthorities](https://www.hud.gov/program_offices/comm_planning/environment_energy/regulations#relatedlawsandauthorities)
- HUD Exchange Related Federal Laws and Authorities:  
<https://www.hudexchange.info/programs/environmental-review/federal-related-laws-and-authorities/>