



U.S. Department of Housing and Urban Development

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Environmental Assessment Determinations and Compliance Findings for HUD-assisted Projects 24 CFR Part 58

Project Information

Project Name: Demolition and Disposition of Fairview Manor

Responsible Entity: City of Gladstone

Grant Recipient (if different than Responsible Entity): Gladstone Housing Commission

State/Local Identifier:

RE Preparer:

Certifying Officer Name and Title:

Consultant (if applicable): Bureau Veritas

Direct Comments to:

Bureau Veritas
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Project Location:

415 South 4th Street
Gladstone, Delta County, MI 49837

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

The project involves the demolition and disposition of Fairview Manor, an existing age-restricted housing facility containing 50 residential units on approximately 2.98 acres of land. Project improvements consist of a three-story building, a maintenance garage, a smoking shed, paved surface drives/parking areas, and landscaping. The facility was constructed in 1967. The project involves demolition of the building, infrastructure, and site improvements under authorization of

Section 18 of the U.S. Housing Act of 1937. Any existence of hazardous materials to be encountered in the demolition process will be mitigated in accordance with all regulatory requirements. Site re-use is anticipated to be as rental housing; however, re-use will be dependent upon the final terms of a disposition. This project will not involve new construction or ground disturbance.

Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:

The Gladstone Housing Commission has determined that the facility is considered physically obsolete per HUD standards. The property needs significant rehabilitation work to make it habitable and existing funding sources are in limited supply. Therefore, it was determined that the best approach for this property is to demolish the existing improvements to allow for the eventual construction of a modern community to better meet the needs of area seniors. This action aligns with the City of Gladstone's redevelopment plans, as expressed in the city's Master Plan document dated 2015.

Existing Conditions and Trends [24 CFR 58.40(a)]:

The project site is currently occupied and operates as public housing for seniors. Age, use, and declining funding have caused the property to fall into disrepair. Property management indicated various recurring issues including basement flooding and mold growth related to a high water table. The site is located in a residential neighborhood with a suburban character. Surrounding properties exhibit varying levels of property maintenance and condition. These trends would likely continue in the absence of the project, along with the continued need for decent and affordable senior housing. The City of Gladstone has reported a "modest amount" of available multifamily and senior housing options, while its population is growing at a faster rate than surrounding communities.

Funding Information

Grant Number	HUD Program	Funding Amount
	Public Housing	

Estimated Total HUD Funded Amount: \$

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]: \$

Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes No ☐ ☒	Review of the USEPA NEPAAssist tool and available mapping resources indicated that the project is not located within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements. Map attached. https://www.epa.gov/nepa/nepassist
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes No ☐ ☒	According to review of the U.S. Fish and Wildlife Service Coastal Barrier Resources System Mapper the project is not located in a CBRS Unit. Therefore, this project has no potential to impact a CBRS Unit and is in compliance with the Coastal Barrier Resources Act. Map attached. https://fwsprimary.wim.usgs.gov/CBRSMapper-v2/
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes No ☐ ☒	The project does not involve financial assistance for construction, rehabilitation, or acquisition of a mobile home, building, or insurable personal property. Therefore, the project is in compliance with flood insurance requirements. Map attached. https://msc.fema.gov/portal/home
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5		
Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes No ☐ ☒	The project does not include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units. Based on the project description, this project includes no activities that would require further evaluation under the Clean Air Act. The project is in compliance with the Clean Air Act. https://www3.epa.gov/airquality/greenbook/anayo_mi.html
Coastal Zone Management	Yes No ☐ ☒	Based on review of the Coastal Zone Management Areas map available from the Michigan Department of Environment, Great Lakes, and Energy, the project

Coastal Zone Management Act, sections 307(c) & (d)		is located in a designated Coastal Zone. However, the project is for demolition/disposition of existing improvements and will not involve any new ground disturbance; therefore, a finding of concurrence with Coastal Zone Management is not required. The project is in compliance with the Coastal Zone Management Act. Map attached. https://gis-michigan.opendata.arcgis.com/
Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	Yes No ☐ ☒	Site contamination was evaluated as follows: ASTM Phase I ESA, ASTM Vapor Encroachment Screening. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. The project is in compliance with contamination and toxic substances requirements. Based on the date of construction (pre January 1, 1978), there is potential that the paint at the project site is lead-based. Therefore, the paint at the project site is assumed to be lead-based. The project should comply with the requirements of the USEPA's 2008 Lead Renovation, Repair, and Painting Rule (as amended in 2010 and 2011), which governs work practices and post-renovation cleanup as they pertain to lead-based paint. Based on the project description, the project is exempt from having to consider radon in the contamination analysis. Based on the date of construction (pre January 1, 1989), asbestos-containing materials may be present at the project site. Based on the proposed demolition activities, Bureau Veritas recommends lead-based paint and asbestos-containing materials evaluations be conducted according to any applicable federal, state, and local requirements for demolition. BV Phase I Environmental Site Assessment, dated July 2026
Endangered Species Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes No ☐ ☒	The proposed demolition activities may result in alteration of stormwater drainage patterns. Bureau Veritas has reviewed information on the US Fish and Wildlife Service mapper, NOAA Fisheries, and the Michigan Natural Heritage Program to determine whether any federally listed threatened or endangered species, or their habitat may exist on or in close proximity to the project site. Based on review of these resources, it is possible that the project could impact up to eight threatened or endangered species. Final or proposed critical habitat has been designated for five of these species, and it was determined by USFWS that the critical habitat does not overlap with the project. Therefore, these species were not evaluated as part of this review. Based on review of available information, the project site does not include habitat suitable for any of the remaining three listed species; therefore, the proposed demolition project is not anticipated to impact any threatened or endangered species. This project is in compliance with the Endangered Species Act without mitigation.

		https://ipac.ecosphere.fws.gov/ https://www.fisheries.noaa.gov/ https://mnfi.anr.msu.edu/
Explosive and Flammable Hazards 24 CFR Part 51 Subpart C	Yes No ☐ ☒	The project does not include development, construction, rehabilitation that will increase residential densities, or conversion. Based on the project description the project includes no activities that would require further evaluation under this section. Furthermore, no explosive/flammable hazards were identified at the project site. Within a one-mile radius of the project, there is no direct line of sight from any part of the project to any hazard, nor is there a hazard in the near vicinity which is not shielded from the project by topography. The project is in compliance with explosive and flammable hazards requirements. Map attached. BV Phase I Environmental Site Assessment, dated July 2026, Section 8.15
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes No ☐ ☒	The project does not include any activities that could potentially convert agricultural land to a non-agricultural use such as new construction, acquisition of undeveloped land, or conversion. The project is in compliance with the Farmland Protection Policy Act. BV Phase I Environmental Site Assessment, dated July 2026, Section 8.9
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes No ☐ ☒	The project was determined to be located outside of the FFRMS floodplain using the 0.2 percent flood approach (0.2 PFA). The project is not considered a critical action. No federal, state, or local sources of CISA data were identified for the project location. Review of the FEMA Flood Insurance Rate Map (Community/Panel No. 26041C0607D, dated March 7, 2023) indicated that the 500-year floodplain is mapped for the nearest floodplain, and the project site is not located in the 500-year floodplain. No preliminary or pending FEMA maps were identified on file for the project location. The project is in compliance with Floodplain Management requirements. https://msc.fema.gov/portal/home
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes No ☐ ☐	BV has submitted a request to the Michigan State Historic Preservation Officer (SHPO) for consultation in accordance with Section 106 requirements. The response from the SHPO has not yet been received. BV Phase I Environmental Site Assessment, dated July 2026, Section 8.12
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	Yes No ☐ ☒	The project is for the demolition of the existing building and will not involve new construction, substantial rehabilitation, or conversion of non-residential areas to residential. Based on the project description, this project includes no activities that would require further evaluation under HUD's noise regulation.
Sole Source Aquifers	Yes No ☐ ☒	Review of the USEPA Interactive Map of Sole Source Aquifers indicated that the project is not located on a Sole Source Aquifer. Furthermore, the project

Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149		consists solely of demolition of an existing multifamily residential facility. Based on the project description, the project consists of activities that are unlikely to have an adverse impact on groundwater resources. The project is in compliance with Sole Source Aquifer requirements. Map attached. https://www.epa.gov/dwssa/map-sole-source-aquifer-locations
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	Yes No ☐ ☒	Based on a review of the U.S. Fish & Wildlife Service National Wetlands Inventory (NWI) map, there are no wetland areas on the project site or vicinity. The project does not involve new construction, expansion of a building's footprint, or ground disturbance. Furthermore, the project will not indirectly impact on-site or off-site wetlands. Based on the project description this project includes no activities that would require further evaluation under this section. The project is in compliance with Executive Order 11990. Map attached. https://www.fws.gov/program/national-wetlands-inventory/wetlands-mapper
Wild and Scenic Rivers Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes No ☐ ☒	Based on review of the National Wild & Scenic Rivers System and list of Study Rivers maintained by the U.S. Bureau of Land Management, National Park Service, US Fish and Wildlife Service, and US Forest Service, as well as the Nationwide Rivers Inventory (NRI) maintained by the National Park Service, this project is not within proximity of a designated Wild and Scenic River, Study River, or NRI River. The project is in compliance with the Wild and Scenic Rivers Act. Maps attached. https://rivers.gov/ https://www.nps.gov/subjects/rivers/nri-map.htm

Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27]

Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is

attached, as appropriate. **All conditions, attenuation or mitigation measures have been clearly identified.**

Impact Codes: Use an impact code from the following list to make the determination of impact for each factor.

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor Adverse Impact – may require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement

Environmental Assessment Factor	Impact Code	Impact Evaluation
LAND DEVELOPMENT		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	The project is located within a small city and is fully developed with a multifamily residential facility. The existing improvements are planned for demolition so that the property may be eventually repositioned to serve more seniors. As such, this action supports the goals outlined in the City of Gladstone's Master Plan through elimination of substandard housing and provision of additional affordable housing. The project is zoned R3 (High Density Residential), which allows for multifamily uses. Based on the project description, the project will not contribute to urban sprawl or environmental injustices. No impacts are anticipated. https://www.gladstonemi.gov/community-development
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	The project consists of existing developed land. The site topography is relatively flat. Evidence of a high water table was noted; however, the project does not include new construction, acquisition, or conversion. No evidence of ground disturbance, seismic activity, or other unusual conditions at the site were noted during the site reconnaissance. The demolition contractor is expected to ensure compliance with all local, state, and federal requirements related to sediment control, drainage, and discharge of surface runoff and stormwater from the site. Based on the project description, no impacts are anticipated. https://www.usgs.gov/programs/national-geospatial-program/topographic-maps
Hazards and Nuisances including Site Safety and Noise	2	Worker safety will be addressed with the preparation and implementation of a site-specific Health and Safety Plan. Temporary impacts from noise, vibration, and dust will be mitigated with best management practices. Based on site observations and review of available planning resources, the project will not be affected by any natural hazards such as earthquakes, severe storms, floods, or forest and range fires; or by any man-made site hazards or nuisances. No impacts are anticipated. https://www.fema.gov/emergency-managers/practitioners/resilience-analysis-and-planning-tool
Energy Consumption	1	Tools and equipment used during the demolition activities will consume modest quantities of energy. However, as the existing building is planned for demolition, the overall energy consumption at the site will be reduced. https://www.hudexchange.info/resource/5115/renewable-energy-toolkit/

Environmental Assessment Factor	Impact Code	Impact Evaluation
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SOCIOECONOMIC		
Employment and Income Patterns	1	The demolition project is expected to create some temporary construction-related jobs. According to the U.S. Bureau of Labor Statistics, Delta County has a civilian workforce of approximately 13,782 and the average weekly wage is \$1,008. According to the Federal Reserve Bank of St. Louis, the current unemployment rate is 6.0%. https://www.bls.gov/regions/midwest/news-release/countyemploymentandwages_michigan.htm https://fred.stlouisfed.org/series/MIDELT1URN
Demographic Character Changes, Displacement	2	The population of Gladstone is approximately 5,189. Among this total, approximately 24% are aged 65 years and older and 20% are aged under 18. The population is largely White (94%); however, the population reporting Two or More Races comprises the next largest group (5%). The demolition project will have a limited timeframe and anticipates the use of local labor. Proceeds from the sale of the property may be used to fund construction of a new development that better meets the needs of the community. Resident displacement will be handled in accordance with professionally prepared plans and in accordance with HUD guidelines as part of the planned project. Therefore, the project is not expected to impact the physical, social, and psychological characteristics of the community. https://www.census.gov/quickfacts/fact/table/gladstonecitymichigan/IPE120224 https://www.ers.usda.gov/data-products/food-access-research-atlas/go-to-the-atlas.aspx

Environmental Assessment Factor	Impact Code	Impact Evaluation
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	2	As the existing improvements are planned for demolition, there will be no increase in demand for educational and cultural facilities. No impacts are anticipated.
Commercial Facilities	2	This project will not result in an increase in demand for commercial facilities. Furthermore, based on the scale of the project, harm to existing businesses is not anticipated. No impacts are anticipated.
Health Care and Social Services	2	As the existing improvements are planned for demolition, this project will not result in an increase in demand for health care and social services. No impacts are anticipated.
Solid Waste Disposal / Recycling	2	Demolition debris, as well as any waste materials containing lead and asbestos, will be removed and disposed of in accordance with professionally prepared construction specifications and in accordance with federal, state, and local regulations as part of the planned project. Waste disposal facilities are located throughout Delta County. The primary solid waste landfill is the Delta County Landfill (5701 19 th Ave N, Escanaba), which accepts construction and demolition debris. https://deltacountymi.gov/delta-solid-waste-management-authority/
Waste Water / Sanitary Sewers	2	The existing waste water/sanitary sewer infrastructure is to be removed during demolition activities. No impacts are anticipated.
Water Supply	2	The existing water supply infrastructure is to be removed during demolition activities. No impacts are anticipated.

Public Safety - Police, Fire and Emergency Medical	2	As the existing improvements are planned for demolition, this project will not result in an increase in demand for public safety services. No impacts are anticipated.
Parks, Open Space and Recreation	2	As the existing improvements are planned for demolition, this project will not increase the demand for parks or open space, or result in the deterioration of existing facilities. No impacts are anticipated.
Transportation and Accessibility	1	As the building is planned for demolition, the project is expected to ease neighborhood traffic. There will be no increase in demand for transportation services.

Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEATURES		
Unique Natural Features, Water Resources	2	Based on review of project plans, site observations, aerial photography, topographic maps, and information available from the National Natural Landmarks Program, no unique natural features or water resources are present within the area of the property or visible from the property. Therefore, the project is not expected to adversely impact unique natural features or ecosystem services. https://www.nps.gov/subjects/nlandmarks/nation.htm
Vegetation, Wildlife	2	The project is located in a developed area and does not contain significant undisturbed natural areas. The project has been continuously used as a multifamily residential facility since the late 1960s. Furthermore, the project has been determined to have no effect on federally listed threatened or endangered species, or their habitat. No impacts are anticipated. https://ipac.ecosphere.fws.gov/ https://cfpub.epa.gov/wizards/qiwiz/
Other Factors	2	The project includes demolition of an existing multifamily residential facility and therefore is not expected to contribute significantly to climate change impacts in the form of increased vehicular traffic or energy use. In addition, no further consideration is warranted regarding climate change impacts that would threaten resident safety, wellbeing, or property within the useful life of the project. https://crt-climate-explorer.nemac.org/

Additional Studies Performed:

- Phase I Environmental Site Assessment, prepared by Bureau Veritas and dated July 2026
- Asbestos Survey Report, prepared by Bureau Veritas and dated July 2026

Field Inspection (Date and completed by):

June 30, 2026, completed by Paul Kittelson, Bureau Veritas

List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]:

- Phase I Environmental Site Assessment, prepared by Bureau Veritas and dated July 2026
- Asbestos Survey Report, prepared by Bureau Veritas and dated July 2026
- Google™ Earth Pro aerial imagery
- USEPA Envirofacts, <http://www.epa.gov/enviro/>

- USEPA NEPAAssist Tool, <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>
- City of Gladstone, Michigan, Community Development, <https://www.gladstonemi.gov/community-development>
- USGS Topographic Maps, <https://www.usgs.gov/programs/national-geospatial-program/topographic-maps>
- FEMA Resilience Analysis and Planning Tool (RAPT), <https://www.fema.gov/emergency-managers/practitioners/resilience-analysis-and-planning-tool>
- HUD Community Planning and Development Renewable Energy Toolkit, <https://www.hudexchange.info/resource/5115/renewable-energy-toolkit/>
- Bureau of Labor Statistics, County Employment and Wages in Michigan – Fourth Quarter 2025, https://www.bls.gov/regions/midwest/news-release/countyemploymentandwages_michigan.htm
- Federal Reserve Bank of St. Louis, Unemployment Rate in Delta County, MI, <https://fred.stlouisfed.org/series/MIDELT1URN>
- U.S. Census Bureau, QuickFacts, Gladstone City, Michigan, <https://www.census.gov/quickfacts/fact/table/gladstonecitymichigan/IPE120224>
- USDA Economic Research Service, Food Access Research Atlas, <https://www.ers.usda.gov/data-products/food-access-research-atlas/go-to-the-atlas.aspx>
- Delta County Solid Waste Management Authority, <https://deltacountymi.gov/delta-solid-waste-management-authority/>
- National Park Service, National Natural Landmarks Program, <https://www.nps.gov/subjects/nnlandmarks/nation.htm>
- U.S. Fish and Wildlife Service, Information for Planning and Consultation, <https://ipac.ecosphere.fws.gov/>
- USEPA, Green Infrastructure Wizard, <https://cfpub.epa.gov/wizards/giwiz/>
- Climate Explorer Tool, <https://crt-climate-explorer.nemac.org/>

List of Permits Obtained:

Public Outreach [24 CFR 50.23 & 58.43]:

Cumulative Impact Analysis [24 CFR 58.32]:

As the existing facility is planned for demolition, cumulative impacts to the environment are expected to be minimal. The project is expected to produce immediate beneficial impacts in the form of elimination of substandard housing, decreased energy consumption and local traffic, and the creation of temporary jobs. In the longer term, this action will allow for eventual repositioning of the property to better serve the needs of local seniors. Any potentially adverse impacts resulting from this project are minor and include those typical of any similar scale demolition project. These impacts include temporary impacts from soil erosion, sediment deposition, and nonagricultural runoff, which can be mitigated with the installation of erosion and sediment controls. Worker safety is to be addressed through the preparation and implementation of a project specific Health and

Safety Plan. Temporary impacts from noise, vibration, and dust are to be mitigated with best management practices.

Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]

No alternatives were considered, other than “No Action.”

No Action Alternative [24 CFR 58.40(e)]:

The “No Action” alternative would leave the physically obsolete building on the property, resulting in increasingly difficult and costly maintenance, as well as issues with the health, safety, and welfare of its residents.

Summary of Findings and Conclusions:

The project will not result in significant impacts to the environment. However, the project should comply with the requirements of the USEPA’s 2008 Lead Renovation, Repair, and Painting Rule (as amended in 2010 and 2011), which governs work practices and post-renovation cleanup as they pertain to lead-based paint. In addition, identified asbestos containing materials should be removed by a licensed asbestos contractor in accordance with all applicable federal, state, and local regulations. The Environmental Assessment identified temporary construction hazards that may affect project workers and the surrounding environment. However, no specific actions are recommended as project plans already incorporate measures to mitigate these impacts. No additional formal compliance steps or mitigation are recommended at this time.

Mitigation Measures and Conditions [40 CFR 1505.2(c)]

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure
Not applicable	Not applicable

Determination:

☐ **Finding of No Significant Impact** [24 CFR 58.40(g)(1); 40 CFR 1508.27]

The project will not result in a significant impact on the quality of the human environment.

☐ **Finding of Significant Impact** [24 CFR 58.40(g)(2); 40 CFR 1508.27]

The project may significantly affect the quality of the human environment.

Preparer Signature: Joslyn Smith Date: _____

Name/Title/Organization: Joslyn Smith, Senior Environmental Consultant, Bureau Veritas

Certifying Officer Signature: _____ Date: _____

Name/Title: _____

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).