NEW YORK STATE HOUSING TRUST FUND
HOME PROGRAM

PROGRAMMATIC ENVIRONMENTAL REVIEW RECORD
FOR LOCAL PROGRAM ADMINISTRATOR (LPA) PROGRAMS

PROGRAM NAME: Greene County Trailer Replacement Program

SHARS NUMBER: 20133162

PROGRAM SPONSOR: Catskill Mountain Housing Development Corp. Inc.

PRIMARY CONTACT: (NAME AND TITLE) Mr. Lawrence Krajeski, Executive Director

ADDRESS: PO Box 473, 448 Main St
Catskill, NY
12414

TELEPHONE: 518-943-6700 ext 11
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EMAIL: Larry@cmhdc.org

RESPONSIBLE ENTITY: NYS Housing Trust Fund Corporation (HTFC)

CERTIFYING OFFICER: Director, Environmental Analysis Unit

PROGRAM LOCATION (OR TARGET AREA): Greene County

1.0 PROGRAM ACTIVITIES *(Provide a complete description of the program. Include whether sites selected for the program may require a zone change, special use permit or subdivision approval and the number of units to be provided. Also determine any site disturbance will occur, including digging utility trenches and installing or improving wells or septic systems).*

Catskill Mountain Housing Development Corporation is requesting $400,000 in HOME funds to provide replacement of approximately nine mobile home units in Greene County, NY. These funds would be combined with $300,000 from a separate Affordable Housing Corporation grant. All income eligible (50% of area median income) homeowners in Greene County New York will be eligible to participate. The proposed program will not only preserve our existing housing stock by extending the life of the home, by correcting structural deficiencies and repairing building systems which might threaten the health and safety of the occupants, but also ensure that even very low income families will be provided with safe, decent and affordable housing. For mobile home replacement, the same footprint will be used when possible. For some sites

ground disturbance may occur, for example for septic repair or water well installation.

ESTIMATED TOTAL PROJECT COSTS: $700000.00
HTFC HOME AWARD AMOUNT: $400,000.00

2.0 PROGRAM CLASSIFICATION - NEPA (Check one)

☐ 2.1 – Exempt

☐ 2.2 – Categorically Excluded - subject only to regulations at 58.6

☒ 2.3 – Categorically Excluded - subject to 24 CFR 58.5 and 58.6

☐ 2.4 - Environmental Assessment Required

3.0 PROGRAM CLASSIFICATION - SEQR (Check one)

☒ 3.1 - Type II action.

☐ 3.2 - Unlisted action *(Contact HTFC environmental staff for further guidance)*.

4.0 REGULATORY COMPLIANCE DOCUMENTATION

4.1 PROCEDURES TO COMPLY WITH RELATED LAWS AT 24 CFR 58.6
(Use additional pages if necessary)

*Flood Disaster Protection Act of 1973

All proposed sites will be located on Flood Insurance Rate Maps (FIRMs) to determine potential flood hazard if located within a 100 year flood plain. All projects will be reviewed according to Appendix J, Floodplain Management Guidelines for HOME LPA Programs. Any project sites located in a floodplain will comply with all state and federal floodplain regulations. The Floodplain Management Worksheet will be used to document compliance for each project within the 100 year flood plain, and will be submitted to HTFC with the site specific statutory checklist. A copy of the FIRM must be submitted as supporting documentation with the project site clearly indicated. Flood insurance will be purchased for any project located in a 100 year floodplain zone. Projects located within a "regulatory floodway" are not eligible for HOME rehabilitation funding.

4.2 PROCEDURES TO COMPLY WITH RELATED LAWS AT 24 CFR 58.5
(Use additional pages if necessary)

*Historic Properties

Prior to commencement of any rehabilitation project, a Historic Resource Inventory Form will be completed for buildings 50 years or older, or for any project that will include ground disturbance, as described in the Statutory Checklist and, together with a series of photographs of the project site, principal structure(s) and surrounding area, submitted to the SHPO for an effect

determination. Where the SHPO determines that a proposed project will have "No Adverse Impact" with conditions, rehabilitation will be conducted according to SHPO conditions. Program projects may conduct ground disturbance, such as septic or well repair or replacement. When ground disturbance is proposed a request will be submitted to the Tribal Historic Preservation Officer (THPO). The request package forwarded to SHPO will also be used for THPO. If THPO does not respond within 30 days, the THPO review process will be considered closed. An archaeological survey will be completed if requested.

*Floodplain Management
All proposed sites will be located on Flood Insurance Rate Maps (FIRMs) to determine potential flood hazard if located within a 100 year flood plain.. All projects will be reviewed according to Appendix J, Floodplain Management Guidelines for HOME LPA Programs. Any project sites located in a floodplain will comply with all state and federal floodplain regulations. The Floodplain Management Worksheet will be used to document compliance for each project within the 100 year flood plain, and will be submitted to HTFC with the site specific statutory checklist. A copy of the FIRM must be submitted as supporting documentation with the project site clearly indicated. If any project sites in the 100 year floodplain will involve substantial improvements as defined by federal and state floodplain regulations, they must comply with HUD regulations at 24 CFR Part 55. HTFC will be notified prior to any use of the 8-step public notice procedure. Project sites in the SFHA that are classified as substantial improvements will be built according to regulations in 6NYCRR Part 502. No projects located within a "regulatory floodway" are eligible for HOME rehabilitation funding.

*Wetland Protection
For any project that will include any ground disturbance, NYSDEC and US Fish and Wildlife maps of jurisdictional wetlands will be consulted prior to performing regulated activities. If there is a potential presence of wetlands or buffer or check zones, a formal jurisdictional review may be required. If federal or state regulated wetlands are mapped on, or in proximity of the proposed project location, a formal on-site wetlands investigation or delineation shall be performed by a qualified wetlands biologist or soil scientist to determine the specific location of any wetland boundaries and any applicable buffers thereof. Any activity in a jurisdictional wetland must comply with HUD regulations at 24 CFR Part 55.

*Endangered Species
For projects that propose ground disturbance on previously undisturbed ground, the LPA will consult with the NYS Natural Heritage Program office. Documentation of the consultation will be submitted to HTFC with the site specific statutory checklist. The LPA will also follow US Fish and Wildlife Service directions for project reviews at http://www.fws.gov/northeast/nyfo/es/section7.htm. If the USFWS directions reveal the possibility of an endangered species on the site, the EAU will be contacted to further consult with the USFWS.

*Wild and Scenic Rivers
The following state/federal Wild, Scenic and Recreational Rivers (WSRR) are located within the target area: the Batavia Kill and the Catskill Creek. All sites will be reviewed to determine their

location with regard to the WSRRs. No program activities should impact WSRR, but EAU and/or NYSDEC will be contacted with regard to any site within 100 feet of a WSRR to determine any permitting requirements.

*Noise Abatement and Control
For substantial rehabilitation and new residential construction projects, a noise assessment will be prepared if the site is located within 1,000 feet of a major four-lane highway, 3,000 feet of an active railroad line, or 15 miles from a major commercial or military airport in accordance with the procedures described in The Noise Guidebook, HUD-953-CPD, updated June 5, 2002. For substantial rehabilitation projects where the average ambient day-night level (DNL) exceeds 65 decibels (dB) but does not exceed 75 dB, noise attenuation will be strongly encouraged. For new construction projects where the DNL exceeds 65dB but does not exceed 75dB, noise attenuation is required. For all projects where the DNL exceed 75 dB, the site is generally unacceptable according to HUD guidelines.

*Thermal/Explosive Hazards
For sites involving new construction, increase in units, restoration of abandoned structures (abandoned for more than one year), conversion of use to residential or increase in mobile home size, where the replacement unit is in a new location or is at least 122% larger than the original footprint, the acceptable separation distance (ASD) from existing above ground storage facilities which contain flammable or explosive materials, as defined by 24 CFR Part 51 (c), will be determined, and appropriate decisions made according to regulatory requirements. A survey will be conducted by a qualified environmental professional within a 1,000 foot radius of the site to determine if there exist any above-ground stationary facilities which store flammable gases, regardless of tank size. The survey will also determine if there are any facilities which store flammable or explosive liquids in tanks exceeding 100 gallons. Tanks, which exceed 20,000 gallons and are within 1 mile of the site will also be identified. If such tanks are identified, EAU will be provided with enough information to conduct a thermal explosive hazard analysis. If the site is located within the ASD, modification of the proposed layout or construction of earthen berms or concrete barriers will need to be considered. ASD is line of sight and blast barriers such as buildings or hills would make the site not subject to these regulations.

*HUD Environmental Standards
A qualified environmental professional will visit each site to determine that each site is not on or near any hazardous materials or contamination. The site visit report will include a signed certification statement as follows: "I (Name/Title) am a qualified environmental professional as per ASTM 1527".

*Environmental Justice
According to NYSDEC mapping at: http://www.dec.ny.gov/public/899.html, the target area does include potential environmental justice areas. The program is intended to serve an existing need for affordable housing and is not expected to facilitate development which would result in adverse environmental justice impacts. All substantial rehabilitation projects will be reviewed to determine whether they are within an acceptable noise level area. If applicable, there will not be unmitigated thermal explosive hazards in close proximity to the sites. Each site will be reviewed for compliance with HUD Environmental Standards.

*Asbestos & Lead-Based Paint
Regarding asbestos containing materials (ACM), all project work will comply with NYS Department of Labor Part 56 requirements including the need for surveys and clearance reports, as required. A Contractor will be involved in the project construction and will be instructed regarding the need for compliance with Part 56.
Regarding lead-based paint (LBP), in homes constructed prior to 1978, all work will be conducted according to the HUD "Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing" and the EPA Renovation, Repair and Painting Rule (RRP Rule). All ACM and LBP must be properly disposed of at a properly licensed facility. The LPA must maintain all compliance documentation for potential audit by EAU. .

5.0 ENVIRONMENTAL ASSESSMENT *(This section to be completed only for programs which require an EA according to Section 2.4).*

N/A

5.1 MITIGATION MEASURES NEEDED *(This section to be completed only for programs which require an EA according to Section 2.4).*

N/A

5.2 ALTERNATIVES TO THE PROPOSED ACTION *(This section to be completed only for programs which require an EA according to Section 2.4).*

No Action:

n/a

Other alternatives:

n/a

Preferred alternative:

n/a

5.3 ENVIRONMENTAL FINDING: *(This section to be completed only for programs which require an EA according to Section 2.4* - Check one)

☐ Finding of No Significant Impact (FONSI)

☐ Finding of Significant Impact (FOSI)

6.0 PUBLIC NOTICES (Check one)

☐ 6.1 No public notice is required in connection with this program (for program classifications 2.1 and 2.2, above).

☒ 6.2 A Notice of Intent to Request Release of Funds (NOIRROF) will be published and distributed in connection with this program *(for program classification 2.3, above).*

☐ 6.3 A combined Finding of No Significant Impact (FONSI) and Notice of Intent to Request Release of Funds (NOIRROF) will be published and distributed in connection with this program *(for program classification 2.4, above).*

Prepared by: Lawrence Krajeski

Signature: _____

Date: March 19, 2015

ERR ATTACHMENT 2.1

EXEMPT ACTIVITIES (24 CFR 58.34, you may check more than one)

- ☐ Environmental and other studies, resource identification and development of plans and strategies [58.34(a)(1)].
- ☐ Information and financial services [58.34(a)(2)].
- ☐ Administration and management activities [58.34(a)(3)].
- ☐ Public services that will not have a physical impact or result in physical changes, such as services concerned with employment, crime prevention, child care, health, drug abuse, education, counseling, energy conservation and welfare or recreational needs [58.34(a)(4)].
- ☐ Inspections and testing of properties for hazards or defects [58.34(a)(5)].
- ☐ Purchase of insurance [58.34(a)(6)].
- ☐ Purchase of tools [58.34(a)(7)].
- ☐ Engineering or design costs [58.34(a)(8)].
- ☐ Technical assistance and training [58.34(a)(9)].
- ☐ 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 physical disasters, imminent threats or physical deterioration [58.34(a)(10)].
- ☐ Payment of principal and interest on loans made or obligations guaranteed by HUD [58.34(a)(11)].
- ☐ Any of the categorical exclusions listed in 58.35(a), provided that there are no circumstances which require compliance with any other federal laws and authorities cited in 58.5 [58.34(a)(12)].

ERR ATTACHMENT 2.2

CATEGORICALLY EXCLUDED ACTIVITIES [58.35(b)]

Activities in this section require compliance with related laws and authorities at 58.6, but not 58.5. * you may check more than one.

☐ Tenant-based rental assistance [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 [58.35(b)(2)].

☐ Operating costs including maintenance, security, operation, utilities, furnishings, equipment, supplies, staff training and recruitment and other incidental costs [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 [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 [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 which do not have a physical impact [58.35(b)(6)].

☐ Approval of supplemental assistance (including insurance or guarantee) to a project previously approved under this part, if the approval is made by the same responsible entity that conducted the environmental review on the original project and re-evaluation of the environmental findings is not required under Sec. 58.47 [58.35(b)(7)].

* If a responsible entity determines that an activity or project identified above, because of extraordinary circumstances or conditions at or affecting the location of the activity or project, may have a significant environmental effect, an environmental assessment must be prepared and a determination of significance made.

** **This exclusion applies only to financial assistance for purchase of existing for-sale homes or homes under construction. Homebuyer assistance for units not already under construction is classified as Categorically Excluded according to Section 2.3 of the ERR form, or an activity requiring Environmental Assessment according to Section 2.4 of the ERR form. In all cases, for this exclusion to apply, the prospective buyer must have discretion regarding selection of properties within the target area.**

ERR ATTACHMENT 2.3

CATEGORICALLY EXCLUDED ACTIVITIES [58.35(a)]

Activities in this section require compliance with related laws and authorities at 58.5 and 58.6, you may check more than one.

☐ Acquisition, repair, improvement, reconstruction, or rehabilitation of public facilities and improvements (other than buildings) when the facilities and improvements are in place and will be retained in the same use without change in size or capacity of more than 20 percent. Examples of this type of activity include replacement of water and sewer lines, reconstruction of curbs and sidewalks, street repaving [58.35(a)(1)].

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

☒ Rehabilitation of buildings and improvements for residential use (with one to four units), where 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 in a wetland [58.35(a)(3)(i)].

☐ Rehabilitation of multifamily residential buildings (with five or more units), when the following conditions are met: a) unit density is not changed more than 20 percent, b) the project does not involve changes in land use from residential to non-residential, and c) the estimated cost of rehabilitation is less than 75 percent of the total estimated cost of replacement after rehabilitation [58.35(a)(3)(ii)].

☐ Rehabilitation of non-residential structures, including commercial, industrial, and public buildings when the following conditions are met: a) the facilities and improvements are in place and will not be changed in size or capacity by more than 20 percent, and b) the activity does not involve a change in land use, such as from non-residential to residential, or from one industrial use to another [58.35(a)(3)(iii)].

☒ An individual action on up to four dwelling units (not including rehabilitation - see 58.35(a)(3)(i) above) 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 [58.35(a)(4)(i)].

☐ An individual action on a project of five or more housing units (not including rehabilitation - see 58.35(a)(3)(i) above) developed on scattered sites when the sites are more than 2,000 feet apart and there are not more than four housing units on any one site [58.35(a)(4)(ii)].

☐ Acquisition or disposition of an existing structure or acquisition of vacant land provided that the structure or land acquired or disposed will be retained for the same use [58.35(a)(5)].

☐ Any combination of the above activities [58.35(a)(6)].

Statutory Checklist – PROGRAMMATIC REVIEW

SHARS No: 20133162
LPA Name: Catskill Mountain Housing Development Corp. Inc.
Program Name: Greene County Trailer Replacement Program

*A - Not Applicable to this Project
B - Consultation, Permit and/or Mitigation Required.

Area of Statutory -Regulatory Compliance	**A***	**B**	**Provide compliance documentation** **Additional material may be attached.**
Section 4.1			
Flood Disaster Protection Act of 1973	☐	☒	All proposed sites will be located on Flood Insurance Rate Maps (FIRMs) to determine potential flood hazard if located within a 100 year flood plain. All projects will be reviewed according to Appendix J, Floodplain Management Guidelines for HOME LPA Programs. Any project sites located in a floodplain will comply with all state and federal floodplain regulations. The Floodplain Management Worksheet will be used to document compliance for each project within the 100 year flood plain, and will be submitted to HTFC with the site specific statutory checklist. A copy of the FIRM must be submitted as supporting documentation with the project site clearly indicated. Flood insurance will be purchased for any project located in a 100 year floodplain zone. Projects located within a "regulatory floodway" are not eligible for HOME rehabilitation funding.
Coastal Barrier Resources Act	☒	☐	No Coastal Barrier Resource Areas exist in the target area. No further Tier 2 review required.
Runway Clear Zones (notification)	☒	☐	Program is owner occupied moderate rehabilitation and replacement only, no assistance to purchase residential properties is proposed, therefore this regulation does not apply and no further Tier 2 review is required.
Section 4.2			

Historic Properties	☐	☒	Prior to commencement of any rehabilitation project, a Historic Resource Inventory Form will be completed for buildings 50 years or older, or for any project that will include ground disturbance, as described in the Statutory Checklist and, together with a series of photographs of the project site, principal structure(s) and surrounding area, submitted to the SHPO for an effect determination. Where the SHPO determines that a proposed project will have "No Adverse Impact" with conditions, rehabilitation will be conducted according to SHPO conditions. Program projects may conduct ground disturbance, such as septic or well repair or replacement. When ground disturbance is proposed a request will be submitted to the Tribal Historic Preservation Officer (THPO). The request package forwarded to SHPO will also be used for THPO. If THPO does not respond within 30 days, the THPO review process will be considered closed. An archaeological survey will be completed if requested.
Floodplain Management	☐	☒	All proposed sites will be located on Flood Insurance Rate Maps (FIRMs) to determine potential flood hazard if located within a 100 year flood plain. All projects will be reviewed according to Appendix J, Floodplain Management Guidelines for HOME LPA Programs. Any project sites located in a floodplain will comply with all state and federal floodplain regulations. The Floodplain Management Worksheet will be used to document compliance for each project within the 100 year flood plain, and will be submitted to HTFC with the site specific statutory checklist. A copy of the FIRM must be submitted as supporting documentation with the project site clearly indicated. If any project sites in the 100 year floodplain will involve substantial improvements as defined by federal and state floodplain regulations, they must comply with HUD regulations at 24 CFR Part 55. HTFC will be notified prior to any use of the 8-step public notice procedure. Project sites in the SFHA that are classified as substantial improvements will be built according to regulations in 6NYCRR Part 502. No projects located within a "regulatory floodway" are eligible for HOME rehabilitation funding.
Wetland Protection	☐	☒	For any project that will include any ground disturbance, NYSDEC and US Fish and Wildlife maps of jurisdictional wetlands will be consulted prior to performing regulated activities. If there is a potential presence of wetlands or buffer or check zones, a formal jurisdictional review may be required. If federal or state regulated wetlands are mapped on, or in proximity of the proposed project location, a formal on-site wetlands investigation or delineation shall be performed by a qualified wetlands biologist or soil scientist to determine the specific location of any wetland boundaries and any applicable buffers thereof. Any activity in a jurisdictional wetland must comply with HUD regulations at 24 CFR Part 55.
Coastal Zone Management	☒	☐	The target area does not contain areas in the NYS Coastal Zone. No further Tier 2 is required.

Sole Source Aquifers	☒	☐	The target area does not contain any SSAs. No Tier 2 review is required.
Endangered Species	☐	☒	For projects that propose ground disturbance on previously undisturbed ground, the LPA will consult with the NYS Natural Heritage Program office. Documentation of the consultation will be submitted to HTFC with the site specific statutory checklist. The LPA will also follow US Fish and Wildlife Service directions for project reviews at http://www.fws.gov/northeast/nyfo/es/section7.htm. If the USFWS directions reveal the possibility of an endangered species on the site, the EAU will be contacted to further consult with the USFWS.
Wild and Scenic Rivers	☐	☒	The following state/federal Wild, Scenic and Recreational Rivers (WSRR) are located within the target area: the Batavia Kill and the Catskill Creek. All sites will be reviewed to determine their location with regard to the WSRRs. No program activities should impact WSRR, but EAU and/or NYSDEC will be contacted with regard to any site within 100 feet of a WSRR to determine any permitting requirements.
Air Quality	☒	☐	The proposed project work is not of a size or scope that contributes to air pollution. No further Tier 2 review is required.
Farmlands Protection	☒	☐	No farmlands will be converted to non-agricultural use during this program. No further Tier 2 review is required.
Noise Abatement and Control	☐	☒	For substantial rehabilitation and new residential construction projects, a noise assessment will be prepared if the site is located within 1,000 feet of a major four-lane highway, 3,000 feet of an active railroad line, or 15 miles from a major commercial or military airport in accordance with the procedures described in The Noise Guidebook, HUD-953-CPD, updated June 5, 2002. For substantial rehabilitation projects where the average ambient day-night level (DNL) exceeds 65 decibels (dB) but does not exceed 75 dB, noise attenuation will be strongly encouraged. For new construction projects where the DNL exceeds 65dB but does not exceed 75dB, noise attenuation is required. For all projects where the DNL exceed 75 dB, the site is generally unacceptable according to HUD guidelines.

Thermal/Explosive Hazards	☐	☒	For sites involving new construction, increase in units, restoration of abandoned structures (abandoned for more than one year), conversion of use to residential or increase in mobile home size, where the replacement unit is in a new location or is at least 122% larger than the original footprint, the acceptable separation distance (ASD) from existing above ground storage facilities which contain flammable or explosive materials, as defined by 24 CFR Part 51 (c), will be determined, and appropriate decisions made according to regulatory requirements. A survey will be conducted by a qualified environmental professional within a 1,000 foot radius of the site to determine if there exist any above-ground stationary facilities which store flammable gases, regardless of tank size. The survey will also determine if there are any facilities which store flammable or explosive liquids in tanks exceeding 100 gallons. Tanks, which exceed 20,000 gallons and are within 1 mile of the site will also be identified. If such tanks are identified, EAU will be provided with enough information to conduct a thermal explosive hazard analysis. If the site is located within the ASD, modification of the proposed layout or construction of earthen berms or concrete barriers will need to be considered. ASD is line of sight and blast barriers such as buildings or hills would make the site not subject to these regulations.
Runway Clear Zones (development)	☒	☐	No civil or military airports exist within or near the target area. No further Tier 2 review is required.
HUD Environmental Standards	☐	☒	A qualified environmental professional will review each site, including a site visit, to determine that each site is not on or near any hazardous materials or contamination. The site visit report will include a signed certification statement as follows: "I (Name/Title) am a qualified environmental professional as per ASTM 1527".
Environmental Justice	☐	☒	According to NYSDEC mapping at: http://www.dec.ny.gov/public/899.html, the target area does include potential environmental justice areas. The program is intended to serve an existing need for affordable housing and is not expected to facilitate development which would result in adverse environmental justice impacts. All substantial rehabilitation projects will be reviewed to determine whether they are within an acceptable noise level area. If applicable, there will not be unmitigated thermal explosive hazards in close proximity to the sites. Each site will be reviewed for compliance with HUD Environmental Standards.

Asbestos & Lead-Based Paint	☐	☒	Regarding asbestos containing materials (ACM), all project work will comply with NYS Department of Labor Part 56 requirements including the need for surveys and clearance reports, as required. A Contractor will be involved in the project construction and will be instructed regarding the need for compliance with Part 56. Regarding lead-based paint (LBP), in homes constructed prior to 1978, all work will be conducted according to the HUD "Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing" and the EPA Renovation, Repair and Painting Rule (RRP Rule). All ACM and LBP must be properly disposed of at a properly licensed facility. The LPA must maintain all compliance documentation for potential audit by EAU.

"I am the authorized signatory for the HTFC HOME LPA award to the entity named below. I have read the Programmatic Environmental Review Record and Statutory Checklist and by signing these documents agree with the statements made therein and agree that all site specific reviews will be conducted in conformance with the described procedures."

Signed:

Name: Lawrence Krajeski

Title: Executive Director

Group: Catskill Mountain Housing Development Corporation

Date: March 24, 2015

Prepared by: Alaina Walag

Consultant Signature & Date: Alaina M. Walag 03/13/2015