



**U.S. Department of Housing and Urban
Development**

451 Seventh Street, SW
Washington, DC 20410
www.hud.gov
espanol.hud.gov

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

Project Information

Project Name: St. Paul's Area/Tidewater Gardens CNI

Responsible Entity: City of Norfolk, Virginia

Grant Recipient (if different than Responsible Entity): Norfolk Redevelopment and Housing Authority

State/Local Identifier: VA006000002

Preparer: Norfolk Redevelopment and Housing Authority on behalf of the City of Norfolk

Certifying Officer Name and Title: Dr. Larry H. Filer, II, Norfolk City Manager

Grant Recipient (if different than Responsible Entity): Norfolk Redevelopment and Housing Authority (NRHA)

Consultant (if applicable): VHB, Inc.

Direct Comments to: Steve Morales, Norfolk Redevelopment and Housing Authority

Project Location: Tidewater Gardens, 250 Walke Street, Norfolk, Virginia plus the addition of nearby City owned properties known as the Snyder Lot, the Transit Area and the proposed renovation of the Willis Building which is approximately 58 acres in total. The Snyder Lot is located in the southwest quadrant of the four-way intersection created by East City Hall Avenue and St. Paul's Boulevard. The Transit Area is located immediately north and south of East Charlotte Street between the intersections with Fenchurch Street and St. Paul's Boulevard, and the Willis Building is located north of Tidewater Gardens at the corner of Church Street and E. Brambleton Avenue.

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

NRHA, together with the City and other major partners, have developed a plan to address the impacts of poverty and implement real change within the extended St. Paul's area of the City. The first component of the St. Paul's project is the redevelopment of Tidewater Gardens plus the addition of nearby City owned properties known as the Snyder Lot, the Transit Area and the proposed renovation of the Willis Building, altogether totaling approximately 58 acres. Tidewater Gardens, located at 450 Walke Street, is a 618-unit NRHA-owned public housing community in Norfolk, Virginia. The obsolesced buildings are now in poor physical condition with over half of the distressed units located within the 100-year floodplain. The extent of deficiencies in the structures and building systems along with overall infrastructure deficiencies is such that major modernization is not recommended. Due to the general state of disrepair, the isolation resulting from the existing site layout, and the obsolete unit sizes and amenities, demolition and subsequent redevelopment is the most practical approach.

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

As a leader in community revitalization, NRHA's mission is to provide quality housing opportunities that promote sustainable mixed-income communities. Planning efforts to transform the area into a mixed income, mixed use, pedestrian friendly neighborhood began in 2005 and include goals such as improving the quality of life for residents of the community through better housing, reduced crime, and better access to the greater community.

The Proposed Action is the first step in a long-term strategy for the redevelopment of aging public housing and the deconcentration of poverty. The concentrated low-income housing design has failed to achieve the program's goal of serving as a stepping stone for its residents to escape high crime and poverty-stricken areas. The concentration of poverty in Tidewater Gardens has not aided upward mobility of its residents out of poverty, instead generations of residents have remained in the community.

Built circa 1953 using low-cost materials, the housing units in Tidewater Gardens have slowly deteriorated over many decades of continuous habitation. Due to age of the original construction, combined with 25 years of continuous use since the last renovation and presence of hazardous materials, the living conditions in the housing units are becoming unhealthy and unsafe. The buildings are now in poor physical condition. Over half of the 618 distressed housing units located within 78 buildings, are located within the 100-year floodplain. The extent of deficiencies in the structures and building systems along with overall infrastructure deficiencies is such that major modernization is not recommended. Due to the general state of disrepair, the isolation resulting from the existing site layout, and the obsolete unit sizes and amenities, demolition and subsequent redevelopment is the most practical approach.

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

Tidewater Gardens housing units, built in 1955, have slowly deteriorated over many decades of continuous habitation. Due to age of the original construction, combined with 25 years of continuous use since the last renovation and presence of hazardous materials, the living conditions in the housing units are becoming unhealthy and unsafe. The Snyder Lot is currently a surface parking lot designated for monthly, permitted parking, which is administered by the Norfolk Division of Parking. The Transit Area provides parking for City-owned buses and commuters. Located on the west end of the Transit Area property is the Downtown Norfolk Bus Transfer Center building where buses pick up and drop off patrons and switch out drivers between shifts. The Willis Building, constructed in 1988, is a large commercial space that is currently vacant. It is located north of Tidewater Gardens at the corner of Church Street and E. Brambleton Avenue. In the absence of the project, it is likely that St. Paul’s Boulevard would continue to function as a line of segregation between the Tidewater Gardens community and the greater Downtown Norfolk. The community would remain disconnected and isolated from opportunities immediately surrounding it.

Funding Information

Grant Number	HUD Program	Funding Amount
VA3F006CNG118	Choice Neighborhood Implementation Program Grant (NRHA)	\$30 M
VA36P00650118	Capital Fund (NRHA)	\$18 M
B-18-MC510016 FY2019	CDBG (City of Norfolk)	\$484,000
B-20-MC510016	CDBG (City of Norfolk)	\$975,000
TBD	Section 8 Housing Assistance Payment	\$43 M

Estimated Total HUD Funded Amount: \$92.5 Million

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]: \$230 Million

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 <input type="checkbox"/> <input checked="" type="checkbox"/>	<i>The proposed project site is not located within 15,000 feet of a military airport or 2,500 feet of a civilian airport. Therefore, review for this resource topic is in compliance with 24 CFR 58.6.</i>
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	<i>There are no Coastal Barrier Resources Systems located in Norfolk.</i>

<p>Flood Insurance</p> <p>Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]</p>	<p>Yes No</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p><i>The redeveloped communities will participate in the National Flood Insurance Program. All future buildings in the FEMA 100-year floodplain would be required to have flood insurance.</i></p>
<p>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5</p>		
<p>Clean Air</p> <p>Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p><i>Norfolk is in attainment status for all criteria pollutants.</i></p>
<p>Coastal Zone Management</p> <p>Coastal Zone Management Act, sections 307(c) & (d)</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p><i>DEQ provided concurrence that the project is consistent with the Virginia CZM Program a letter dated March 16, 2020.</i></p>
<p>Contamination and Toxic Substances</p> <p>24 CFR Part 50.3(i) & 58.5(i)(2)</p>	<p>Yes No</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p><i>Demolition activity and removal of materials containing lead-based paint and asbestos will be performed by licensed contractors in accordance with applicable local, state and federal guidelines. Coordination with DEQ remains ongoing at the Tidewater Gardens site to include tank closure and soil remediation if necessary.</i></p>
<p>Endangered Species</p> <p>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p><i>The USFWS online project review process resulted in a no effect determination. Details are provided in the Resources Scoping Document.</i></p>
<p>Explosive and Flammable Hazards</p> <p>24 CFR Part 51 Subpart C</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p><i>Acceptable Separation Distance (ASD) was calculated based on aboveground storage tanks located within a one-mile radius of the proposed site. No impacts are anticipated as a result of the ASD assessment performed.</i></p>

<p>Farmlands Protection</p> <p>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p><i>According to the National Resources Conservation Service (NRCS) Web Soil Survey, there is no farmland within the vicinity of the proposed site.</i></p>
<p>Floodplain Management</p> <p>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p>Yes No <input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p><i>The majority of the project site is found in either the 100-year or 500-year floodplain. The proposed action will reduce the amount of development located within FEMA floodplains. A 26-acre stormwater park will be designed to improve resiliency within the newly developed project footprint.</i></p>
<p>Historic Preservation</p> <p>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p><i>DHR concurred that the St. Paul's/Tidewater Gardens project would result in a no adverse effect determination in a letter dated June 11, 2020.</i></p>
<p>Noise Abatement and Control</p> <p>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p>Yes No <input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p><i>A HUD noise assessment was completed and is further detailed in the larger CNI EA. Sound attenuation measures will be incorporated as needed to meet necessary outdoor-to-indoor sound attenuation requirements.</i></p>
<p>Sole Source Aquifers</p> <p>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p><i>There are no Sole Source Aquifers within the vicinity of the proposed project.</i></p>
<p>Wetlands Protection</p> <p>Executive Order 11990, particularly sections 2 and 5</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p><i>No wetlands or other waters of the U.S. were located within the boundary of the Tidewater Gardens/St. Paul's CNI project site.</i></p>
<p>Wild and Scenic Rivers</p> <p>Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p><i>There are no Wild and Scenic Rivers, Study Rivers, or river segments on the Nationwide Rivers Inventory in the project area vicinity.</i></p>

ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	<i>The proposed project is not anticipated to have adverse health or environmental effects which disproportionately impact a minority or low-income population relative to the community at large. Impacts caused by implementation of the demolition and redevelopment would be beneficial. Additional details are provided in the larger CNI EA.</i>

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	<i>The Tidewater Gardens Redevelopment would include the removal of existing parking lots and buildings, where present, and construction of flood resilient mixed-use residential and commercial buildings designed to enhance pedestrian circulation and improve connectivity between Tidewater Gardens and the Saint Paul's and Downtown Districts. Redevelopment would more effectively achieve the purposes of the various zoning districts and the Coastal Resilience Overlay District than current building and land uses. Additional details can be read in the larger CNI EA.</i>

Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	<i>The potential for non-point source pollutants to enter groundwater or surface water from stormwater runoff can be mitigated by implementing an erosion and sediment control program in accordance with current regulations and specifications.</i>
Hazards and Nuisances including Site Safety and Noise	1	<i>There would be an unavoidable, temporary increase in ambient noise levels due to demolition activities. Proposed roadway realignment and redevelopment improvements would be designed at a scale that is conducive to pedestrian circulation and is connected and integrated into Downtown.</i>
Energy Consumption	1	<i>Site energy consumption would be substantially reduced by replacing older buildings with new buildings constructed using modern methods and materials. Additional details can be read in the larger CNI EA.</i>
Environmental Assessment Factor	Impact Code	Impact Evaluation
SOCIOECONOMIC		
Employment and Income Patterns	1	<i>Both short- and long-term positive impacts on local employment and income patterns are anticipated. Construction of the proposed project would result in construction jobs and secondary benefits to the local economy. Redevelopment of the existing public housing development as a mixed-use, mixed-income neighborhood would also have positive long-term impacts to the local economy. Additionally, the People First initiative would also connect residents with employment opportunities and assist with economic mobility, which would result in a beneficial impact on the residents.</i>
Demographic Character Changes, Displacement	1	<i>Community conditions are anticipated to improve as a result of the proposed action which would facilitate the redevelopment of the existing Tidewater Gardens community to create a mixed-use, mixed-income neighborhood. Overall, the Proposed Action may result in temporary relocation of the Tidewater Gardens residents. NRHA and the City of Norfolk have implemented measures to reduce this temporary impact. In the long-term, residents would retain a right of return and can choose to return to the redeveloped community, and individuals and families would benefit from the upgraded housing units and a revitalized community. Additional details can be read in the larger CNI EA.</i>

COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	1	<i>William H. Ruffner Middle School is adjacent to the eastern boundary of Tidewater Gardens and Tidewater Park Elementary School borders the community to the northeast. Tidewater Community College Norfolk Campus and Norfolk State University are located within 0.5 miles of Tidewater Gardens to the west and east, respectively. The Proposed Action may have minimal temporary impacts to Tidewater Park Elementary School and William H. Ruffner Academy through increased ambient noise levels during demolition and construction. Relocation of existing Tidewater Gardens residents would redistribute some students between schools and may disrupt the school year for students changing schools. Additional details are included in the larger CNI EA.</i>
Commercial Facilities	1	<i>The Proposed Action proposes to deconcentrate poverty within the Tidewater Gardens neighborhood and provide mixed-income housing and mixed-use development within Tidewater Gardens, on the Snyder Lot, and in the Transit Area. In addition, the proposed redevelopment would increase connectivity and pedestrian access between the Saint Paul's District, Tidewater Gardens, and the Downtown Norfolk District. The redistribution of residences within the project area, the increase in foot traffic as a result of improved pedestrian connectivity, and the intermixture of residential and commercial development would increase commercial activity within the project area.</i>
Health Care and Social Services	2	<i>No changes to health care are anticipated as a result of the proposed project. The proposed action would require all existing Tidewater Gardens residents to be relocated. All current Tidewater Gardens residents are provided access to a relocation counselor as part of the City of Norfolk's People First program. As Tidewater Gardens residents would likely remain in Norfolk, no impacts to other social services are anticipated.</i>
Solid Waste Disposal / Recycling	2	<i>At the completion of the proposed demolition and construction, solid waste generation would be approximately the same as pre-development levels. Negligible impacts are anticipated.</i>

Waste Water / Sanitary Sewers	2	<i>At the completion of the proposed demolition and construction, wastewater production would be approximately the same as pre-development levels. Negligible impacts are anticipated.</i>
Water Supply	2	<i>Subsequent to construction, water use is anticipated to be approximately the same as prior to resident relocation. Impacts to water supply demand at the city level would be negligible as Tidewater Gardens residents are anticipated to relocate within Norfolk.</i>
Public Safety - Police, Fire and Emergency Medical	2	<i>A decrease in the community population may occur during the proposed demolition, which would decrease demand for public safety services in the immediate vicinity of the project area during demolition and redevelopment. In the long-term, no noticeable changes in demand on public safety services are anticipated because residents would likely relocate within Norfolk. There would be no impact to public safety resources associated with the proposed project.</i>
Parks, Open Space and Recreation	1	<i>There would be a substantial conversion of developed area to open green space as a result of the creation of the blue/greenway. This restoration would increase and improve open, recreational space within the project area.</i>
Transportation and Accessibility	2	<i>The transportation needs of the proposed action would not be changed in association with the proposed project.</i>

Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEATURES		
Unique Natural Features, Water Resources	2	<i>The project site is located within an intensely developed area and has been developed for over 50 years. No land disturbance to natural communities is proposed.</i>
Vegetation, Wildlife	2	<i>The project site is currently developed, with a modest amount of landscaped, grassy open space. Proposed activities would not represent a loss of any significant or unique vegetation or wildlife habitat.</i>
Other Factors	N/A	

Additional Studies Performed:

A Section 18 Demolition Disposition Physical Condition Assessment (PCA) was completed by Dominion Due Diligence Group (DG3) to estimate the cost of renovation for all 78 residential buildings in the Tidewater Gardens community. A copy of this report can be made available to interested reviewing parties. Four Phase I ESAs were completed by SCS for the City of Norfolk St. Paul's Area/Tidewater Gardens Redevelopment project and any facilities on site or within a quarter-mile radius were identified and investigated. Phase II Environmental Site Assessments of the Snyder Lot, Transit Site, and Tidewater Gardens Site will address any RECs that could affect the proposed redevelopment. Mitigation measures will be completed to offset any possible contamination or risks to the public. The Willis Building did not contain any RECs for the project and does not require further investigation for the HUD redevelopment. Copies of the Phase I and II reports can be made available to interested viewing parties.

Field Inspection (Date and completed by):

March 10, 2020 by Kimberly Blossom (VHB)

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

As part of the scoping effort, multiple state and federal agencies were coordinated with, including DHR, DEQ and USFWS. These letters are included in Appendix C-F of the Environmental Assessment.

List of Permits Obtained:

N/A

Public Outreach [24 CFR 50.23 & 58.43]:

Public input sessions/community meetings specific to the redevelopment of St. Paul's Area/Tidewater Gardens community have been held as early as since 2005. An extensive list of community engagement and outreach meetings is provided in Appendix B of the Environmental Assessment.

Cumulative Impact Analysis [24 CFR 58.32]:

No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified during the impact assessment. See the larger CNI EA for detailed analysis.

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

The NRHA preferred alternative includes the opportunity to deconcentrate poverty through demolition of an ageing and obsolesced public housing community and allowing for neighborhood revitalization through future construction of a mixed-income, mixed-use community. Please see the larger CNI EA for detailed alternatives descriptions and analysis.

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

Under the No Action alternative, the existing buildings and infrastructure would remain and would continue to be repaired and maintained as time and funding allowed, however it is expected that these costs would continue to increase as these older buildings continue to deteriorate. This alternative does not meet the project purpose of deconcentrating poverty within the Tidewater Gardens community while diversifying a sustainable community and creating opportunities for revitalization.

Summary of Findings and Conclusions:

The proposed action does not constitute an action that normally requires preparation of an EIS and would not have a significant effect on the natural, cultural, or human environment. Adverse environmental impacts that could occur are negligible or minor in intensity. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified during the impact assessment. Implementing this alternative would not violate any federal, state, or local environmental protection laws. Based on the foregoing, it has been determined that an EIS is not required for this project and thus will not be prepared.

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.

Standard mitigation measures have been recommended to minimize impacts associated with the proposed demolition and redevelopment activities but are not required for compliance. Based on the anticipated level of ground disturbance, an Erosion and Sediment Control Plan would be prepared and approved by DEQ. There would be an unavoidable increase in ambient noise during demolition activities. Limiting demolition activities to normal daytime working hours would minimize impacts to nearby residents. All debris containing lead-based paint would be appropriately disposed of in accordance with applicable EPA requirements. Demolition

activity and removal would be performed by a licensed asbestos abatement contractor in accordance with applicable local, state, and federal guidelines. At Tidewater Gardens, removal of two 10,000-gallon USTs and any necessary soil mitigation would be performed by a licensed contractor in accordance with applicable local, state, and federal guidelines. Additional mitigation measures would be implemented as discussed under the relevant resource topics in the chapters within the larger CNI EA. These measures include:

- New buildings would be constructed to current City standards for flood resiliency and would be constructed at a finished floor elevation above the 100-year floodplain. Flood insurance would be required for all units. See the Alternatives chapter above for details.
- Flood insurance would be required for all structures in the FEMA designated floodplain. See Resources Dismissed from Further Analysis section of the larger CNI EA.
- All new buildings would be subject to review by the City Architectural Review Board to ensure design compatibility and minimize visual impacts on nearby historic resources. See the Historic Preservation impact analysis above for details.
- Support services would be provided through the People First initiative to meet the needs of the residents. These support services are in the areas of health and wellness, employment, transportation, economic mobility and youth development and education which will advance equitable outcomes for the families of Tidewater Gardens. The People First initiative also provides case management services to assist families through the relocation process. See the Alternatives chapter above for details.
- Additional measures for noise attenuation would be provided on proposed buildings that would have higher than acceptable interior noise levels. See the Noise impact analysis in the larger CNI EA for details.

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: Steve Morales Date: 06/15/2020

Name/Title/Organization: Steve Morales, Project Director, Norfolk Redevelopment and Housing Authority

Certifying Officer Signature: Larry H. Filer II Date: June 15, 2020

Name/Title: Dr. Larry H. Filer, II, Norfolk City Manager

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).