2017 Addendum B - AHFA's Environmental Policy Requirements
Summary of Changes

Provided below is a brief overview of notable changes to the proposed 2017 Addendum B – AHFA's Environmental Policy Requirements based on the review of the project-specific Phase I Environmental Site Assessments submitted during the 2016 application round.

As a result of the review, the following items, based on their frequency of occurrence, have been determined to be the most common environmental deficiencies for which AHFA has provided additional technical clarification per the proposed plan. The summary also includes the percentage of 2016 applications with issues per item, the specific issues, the changes and/or clarifications made along with the corresponding location within the 2017 draft Addendum B.

Item	Applications with Issues	Issue	Location of Change	Change and/or Clarification
Purpose statement	69%	Failed to include purpose statement	B-3 Section 2.1	Separated from other statements, provided specific wording requirement
ASTM Standards and AHFA Environmental Policy Requirements Certification	69%	Failed to include certification that the report meets both ASTM Standards and AHFA Environmental Policy Requirements	B-3 Section 8.4	Clarified what the EP must certify
Suitability for Residential Use statement	69%	Failed to provide a statement confirming that the property is suitable for residential use	B-3 Section 8.4	Provided specific wording requirement and clarified what the EP must certify
Field verification of listed facilities	77%	Failed to include a statement and documentation confirming field verification	B-3 Section 5.1.2	Clarified which items must be field verified and where they should be located
Search distances	77%	Search radii provided was not consistent with AHFA Environmental Policy Requirements	B-3 Section 5.1.1	Changed location of AHFA required distances, specified where documentation should be located
Proof of insurance with AHFA named as additional insured	60%	AHFA was not named as additional insured	Appendix K.4	Listed the requirement in the specific report format section

In addition, the 2017 draft Addendum B clarifies existing AHFA Environmental Policies by including the following requirements:

- All Phase II ESA Reports must fully address all RECs identified in the Phase I ESA (including any RECs that AHFA determines should have been identified in the Phase I ESA but were not); must be completed in accordance with ASTM E1903-11; and must demonstrate that all environmental conditions associated with the project are appropriate for residential use. If a Phase I ESA identifies an environmental condition that is ruled out as a REC, the Phase I ESA must provide sufficient explanation and supporting data to demonstrate that the environmental condition is not a REC.

- All environmental issues identified (or that AHFA determines, in its sole discretion, should have been identified) in the Phase I ESA and Phase II ESA reports must have been fully abated or mitigated (or provide a written remediation plan approved in writing by the applicable regulatory authority) in a manner that is compatible with unrestricted residential use and is acceptable to AHFA in all respects before construction can begin. All remediation plans approved by an applicable regulatory authority must be submitted to AHFA in writing and include a summary of estimated costs and information regarding the expected source of funding for conducting the remediation activities.

The remaining changes to the draft 2017 Addendum B are intended to provide further clarification regarding the report format and AHFA Environmental Policy. In addition to this summary, please also refer to a separate summary of common mistakes made with respect to 2016 Phase I Environmental Site Assessment submissions.

The intent of this summary is to provide an overview of many of the significant changes to the draft 2017 Addendum B; however, the summary does not cover all changes to the draft. Please review the draft in detail to see all the proposed changes that have been made.