

Workshop

HOUSING CREDITS | HOME | HOUSING TRUST FUND

ALABAMA HOUSING
FINANCE AUTHORITY
Count on home. Alabama.

Environmental Information

February 2025



AHFA Multifamily Competitive Cycle - Environmental Guidance

- All AHFA Environmental Requirements for competitive applications are found at ahfa.com in the [Environmental Policy Requirements](#).
- Additional Post-Award environmental documentation identified in the [AHFA Environmental Assessment Checklist](#) is required for HOME, HOME ARP, and HTF projects .

AHFA Environmental Requirements

PLAN/STUDY

REPORT

IMPLEMENT

AHFA Environmental Policy Requirements

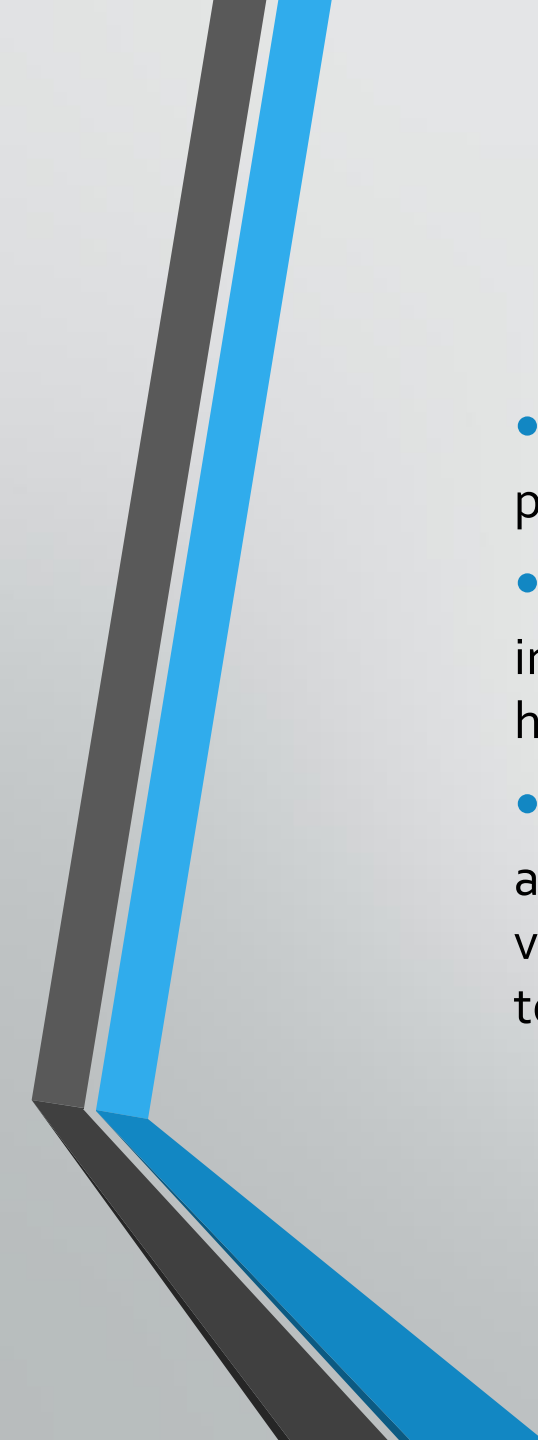
Clarifications for 2025

HUD's Climate Action
Plan

Post-Construction
Radon Testing

Federal Flood Risk
Management
Standards (FFRMS)

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graph TD; A[HUD's Climate Action Plan] --- B[Federal Flood Risk Management Standards (FFRMS)]; C[Post-Construction Radon Testing];
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- **Site Boundaries:** Provide accurate site boundaries to EP for the property seeking AHFA funding.
 - **Site History:** Provide, as soon as possible to the EP, any relevant information regarding the Applicant's knowledge of the site and its history.
 - **Regulatory Approvals:** Be prepared to allow enough time for applicable regulatory approvals (e.g., a jurisdictional determination or voluntary clean-up plan) so that any required approval is obtained prior to the due date.

AHFA Environmental Tips

<https://www.ahfa.com/multifamily/environmental>

- *These tips are not meant to be exhaustive of all the items you should consider when working with your EP. Rather, the tips are meant to help applicants and their EPs avoid common mistakes.*
- *Although the tips are designed to be consistent with AHFA's Environmental Policy Requirements and related policies and regulations, only the requirements set forth in AHFA's Environmental Policy are controlling.*

Tips

Working with Your Environmental Professional



Cost: Understand that environmental assessments for AHFA-funded projects require significantly more work than a standard Phase I Environmental Site Assessment (ESA) and are more costly than a standard Phase I ESA.



Timing: Start discussions with your EP as early as possible (as soon as possible after a site is selected) to ensure they have sufficient time to prepare a complete environmental assessment before the application deadline.



Scope of Assessment: Carefully review the scope of work with the EP to ensure it fully complies with all of AHFA's Environmental Policy Requirements.

Tips

Common Environmental Report Deficiencies

- Noise: must have complete noise worksheets. Include all maps, documents requested on the worksheets & make sure the worksheet summary is complete
- Environmental Data Search distances must comply with AHFA standards.
- [HUD Exchange Partner Worksheets](#) must be included in reports.
- Airport worksheet must include the 2,500 & 15,000 feet radius maps
- Legal Descriptions in reports must match those in the application.
- Acreage in report must match the project site acreage.
- Schematic in report must be the architect's schematic from the application.

Common Application Errors- Environmental

Document	% of Applications with Error(s)	Error(s)
5.1 - 5.3 Records Review	35%	<p>5.5.1 Topography: Public water supply wells located within 1 mile of the property</p> <p>5.2 Database Report: Service Agency listed appear to be inactive, please clarify. Please disclose all listings in the database report, per addendum B-1.7</p> <p>5.2.1 AST Tank is identified as "delisted" and included ASD calculations Discrepancy between EDR report and application, clarify Explain reason for ruling out potential explosive risk.</p> <p>5.3 Standard Historical Information: Please correct reference from 7.0 and 6.0 in this section. Please include the adjacent properties description for the 2019 aerial photograph. Please include description between aerial photograph Dates discussed do not match the aerial report</p>
5.4.1 Aerial Photographs	21%	<p>6.0 Interview documents missing.</p> <p>6.1 Provide contact information for each interviewee and method of contact.</p> <p>6.2 User/Applicant/Developer contact information not provided</p> <p>6.3 Property Owner - listed one company and the form was completed by a different company and appendix B was completed by an individual</p> <p>6.3 Clarify ownership interview (owner is individual or business)</p> <p>6.5 Clarify name of the service provider</p>
6.0 Interviews	25%	<p>Discrepancy on which units is accessible or not, retesting or mitigation is recommended and provided justification for laundry building not being sampled.</p> <p>7.5 Confirm/states radon mitigation in accordance with ANSI-AARST RMS-MF 2018 WITH 12/20 addenda Radon Standards for Multifamily Buildings</p> <p>7.8 Recalculate roadway noise closest to ALDOT counter and/or noise must be measured from boundaries</p> <p>7.9 Provide information whether site is located within the RPZ/CZ or APZ, etc., per addendum B-1.9.d</p> <p>7.10 Statement does not meet 24CFR 58.5(i)(2) requirement</p>
7.0 Additional AHFA Required Elements	28%	<p>Provide Map showing 15-miles radius for airports, calculations and documentations.</p> <p>Noise Calculation form - speed limit and provide confirmation this is the posted speed limit.</p> <p>Provide rationale for using only one-half the value for medium trucks relative to the measurement protocols set forth in HUD's Noise Guidebook. If anticipated noise levels exceed the 65dB threshold, following the revised DNL calculations, please include a noise mitigation plan per Addendum B-1.9d.</p> <p>Airport Noise worksheet is blank/incompleted and clarification on one or more airport listed</p> <p>Provide HUD Noise worksheet and noise mitigation plan</p> <p>Airport Noise Worksheet is blank.</p>
K.3G Noise Evaluation (must include current HUD Partner Worksheets, DNL Calculator Sheets (to include a 10-year noise projection), figures clearly illustrating the site boundary and noise source (with distances to each source clearly indicated on the figures), and if required, mitigation measures, cost estimate, STraCAT and/or Barrier Performance Module.	21%	<p>Airport Noise worksheet is blank.</p>

Common Application Errors- Environmental (continued)

Document	% of Applications with Error(s)	Error(s)
B-3 Report in Required AHFA Format	14%	Provide revised hard copy Phase I ESA with each appendix separately tabbed as required in Addendum B, Page B-2 USB does not match hard copy report.
1.1 Summary: Phase 1 ESA	10%	Discrepancy on acreage reported. Clarify the correct amount of acreage. Missing 1.4 in the table on contacts, please provide. Also transfer the figures presented in Appendix A to the appropriate Appendix K location, per Addendum B-3. Building(s) needs follow up measurements or mitigation, wording needs to match report. Recognized Environmental Conditions not disclosed in the ESA.
3.1 User Provided Information: Title Records	10%	References the incorrect subject property 3.3 User states specialized knowledge in questionnaire 3.4 User questionnaire included, please include in text
4.1 - 4.7 Site Reconnaissance	14%	4.2 General Subject Setting: Report states the subject copries of a portion of a parcel vs tax map indicates whole parcel. 4.7 The uses for adjoining properties do not match those described in Section 4.6. Please clarify the East and South listed commercial uses and make consistent throughout the report.
8.2 Additional Investigations, Limitations, Exceptions, Deviations, and Data Gaps	7%	On table 8, indicate whether or not the interior was accessible Update reference to ASTM

Common Application Errors- Environmental (continued)

Document	% of Applications with Error(s)	Error(s)
Appendix G	21%	Please provide the interview document Interview document blank or incomplete Interview with Fire Chief Document missing
Appendix H	3%	Reliance letter does not have a signature
Appendix I	3%	Signature not included on Engagement Letter
K.2 Proof of Insurance: AHFA minimums or above (AHFA must be listed as Insured)	3%	The current insurance certificate (sample) does not list AHFA as insured, as required in Addendum B-3. AHFA is listed on an expired certificate. Please provide an updated insurance certificate.
K.3A ASD Calculator Sheets and Figure illustrating location of all AST's with 1 mile of the site and their distance from the site boundary.	17%	Provide figure illustrating AST's with 1 mile from site Provide ASD calculator sheets

Common Application Errors- Environmental (continued)

Document	% of Applications with Error(s)	Error(s)
K.3D Wetlands Delineation Report and Request for Jurisdictional Determination (as applicable)	3%	Several errors were observed in the Radon Report
K.3E Wetlands Delineation Report and Request for Jurisdictional Determination (as applicable)	7%	The subject property is part of a larger parcel containing possible wetlands (per NWI Map). Per Addendum B-1.9.b.ii, the request for JD for Army Corps of Engineers was required to be provided in the application.
K.3G Noise Evaluation (must include current HUD Partner Worksheets, DNL Calculator Sheets (to include a 10-year noise projection), figures clearly illustrating the site boundary and noise source (with distances to each source clearly indicated on the figures), and if required, mitigation measures, cost estimate, STraCAT and/or Barrier Performance Module.	21%	<p>Provide Map showing 15-mile radius for airports, calculations, and documentations.</p> <p>Noise Calculation Form - speed limit and provide confirmation this is the posted speed limit.</p> <p>Provide rationale for using only one-half the value for medium trucks relative to the measurement protocols set forth in HUD's Noise Guidebook. If anticipated noise levels exceed the 65dB threshold, following the revised DNL calculations, please include a noise mitigation plan per Addendum B-1.9.d.</p> <p>Airport Noise Worksheet is blank/incomplete and clarification on one or more airport listed</p> <p>Provide HUD Noise worksheet and noise mitigation plan</p> <p>Airport Noise Worksheet is blank.</p>



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Tips After Application Submitted

- **Response to AHFA Missing Documents/ Clarifications:** Upon receipt of AHFA comments to the environmental assessment, immediately forward those comments to the EP in order to ensure response within required 10-day turnaround time.
- **Missing Documents:** please review submittal against what was originally provided.
- **If the Project is Funded:** additional environmental documents may be required.



Thank you

Ahfa.mf.Environmental@AHFA.com