Updated Tips for Working with Your Environmental Professional

**June 28, 2022**

The following is an updated list of tips for working with your Environmental Professional (EP) in preparing the environmental assessment to be submitted with applications for AHFA-related projects.

*NEW:*

*AHFA’s current Environmental Policy Requirements (Addendum B) state that all Phase I Environmental Site Assessments must comply with “the current version of the ASTM Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process’ as of the date the Phase I ESA is completed.” AHFA is aware that ASTM replaced ASTM E1527-13 with ASTM E1527-21 on November 1, 2021. However, as of the date of this notice, neither the U.S. Environmental Protection Agency (“EPA”) nor HUD have adopted the new ASTM standard. Until such time as EPA or HUD adopt the new ASTM standard or AHFA withdraws this notice, AHFA will accept Phase I ESAs that comply with the ASTM E1527-13 standard and all other requirements of AHFA’s Environmental Policy Requirements. 1/6/22*

**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.

**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 environmental assessment submitted to AHFA.

**Response to AHFA Comments**: Upon receipt of AHFA comments to the environmental assessment, immediately forward those comments to the EP in order to insure response within required 10 business day turnaround time.

**Unrestricted Residential Use**: Recognize that AHFA requires sites to be meet ADEM’s standard for unrestricted residential use and that the environmental assessment must demonstrate that all environmental conditions associated with the project meet that standard. AHFA cannot accept institutional or engineering controls on proposed sites other than a restriction of groundwater for potable or irrigation purposes in instances where public water is supplied.

**Environmental Sampling**: Any Recognized Environmental Conditions identified by the EP will likely require the submission of a Phase II ESA at the time of application. The scope of the Phase II should be carefully reviewed to be certain that it is in compliance with all AHFA requirements, including applicable ASTM Standard and ADEM requirements.

**Mitigation**: Any mitigation at a site required to meet AHFA Environmental Policy Requirements must be sufficiently described so as to demonstrate how the proposed mitigation plan is in compliance with AHFA requirements and include all costs associated with the proposed mitigation. Alternative options for mitigation may be provided; however, all options must meet AHFA Environmental Policy Requirements.

*The 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 current year allocation plans are controlling.*