

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

Project Information

Project Name: Cambrian Rise Building “H”

Responsible Entity: City of Burlington, VT

Grant Recipient (if different than Responsible Entity):

State/Local Identifier: Vermont

Preparer: Christine Curtis, Senior Community Development Specialist, Community & Economic Development Office

Certifying Officer Name and Title: Brian Pine, Director, Community & Economic Development Office

Consultant (if applicable): SRW Environmental Consulting, LLC

Direct Comments to:

Christine Curtis, Senior Community Development Specialist

149 Church Street, 3rd Floor

Burlington, VT 05401

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Project Location: 100 Cambrian Way, Burlington, Vermont 05401

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

The subject property includes a 1.224-acre subdivision (Lot 8, Building H) of the Cambrian Rise property which is the former Burlington College property. The subject property is a vacant parcel that was previously cleared, bulldozed, filled, and excavated as part of the Cambrian Rise Master Development. This parcel was reviewed previously for Act 250, a review which included assessments of many of the environmental resources that require assessment by HUD.

The proposed project will provide affordable housing in Building H as part of a larger housing development and will include parking, landscaping, sidewalks, and utility connections. The project results in the disturbance of the entire property, which occurred prior to consideration of the proposed affordable housing development. Building H will include two distinct, but connected sections, one for 40 rental apartments and the other for 30 affordable owner-occupied condominiums. Approximately 10 project-based Section 8 vouchers are anticipated.

The project has been found to be in compliance with all HUD environmental laws and authorities and no significant adverse environmental impacts to the character, features, and resources of the project

area, as a result of this project as planned, have been identified. Mitigation factors are limited to the post-construction testing of the building for radon and activation of the pre-installed radon mitigation system if activation is warranted, based on radon test results.

Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]: Affordable housing is the City's highest priority. The need for quality, affordable housing in the City of Burlington is significant, especially in the prime location, just north of the downtown area. In 2016, it was estimated that approximately 54% of renters and 30% of homeowners in Burlington pay a third or more of their income on housing costs. While affordability is a major challenge across all incomes, it is increasingly impacting low- and moderate-income households, and minority households are significantly more likely to experience severe cost burden. The proposed project will add 70 units of affordable housing to partially meet that need.

Existing Conditions and Trends [24 CFR 58.40(a)]: While rental housing vacancies have experienced some ups and downs, over the last two decades, the average annual apartment vacancy rate in Chittenden County has been just 1.8%; within the urban core of Chittenden County from June through December 2018, this rate was at just 1.2%. A 5% vacancy is considered to be the signal of a "healthy" housing market, offering opportunities for housing mobility and newcomers, and helping keep prices in check. In Burlington, and much of New England, given the current economic conditions, housing costs continue to rise, and vacancy rates are declining, and near historic lows.

Funding Information

Grant Number	HUD Program	Funding Amount
MC500200	HOME	\$1,500,000

Estimated Total HUD Funded Amount: \$1,500,000

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]: \$42,500,000

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"/>	The proposed project and master development are not located within an airport clear zone screening area of any Part 139 civilian airport (>2,500 feet from the runway) or military airfield (>15,000 feet from the runway). The nearest part 139 civilian airport and military

		airfield is the Burlington International Airport located approximately 3.1 miles from the proposed project. Therefore, compliance has been achieved. Source: SRW map of Part 139 airports and military airfields.
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"/>	The proposed project and master development are not located within a coastal barrier zone and neither will or have impacted coastal barrier zones. Source: US Fish and Wildlife Service Coastal Barrier Resources System Mapper.
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	No 100-year floodplain exists at the proposed project or master development and flood insurance is not required. Compliance is achieved. Source: Flood Insurance Rate Map (FIRM) 50007C0251D, dated July 18, 2011.
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5		
Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The proposed project and master development are not located in an EPA non-attainment area. Neither the proposed project nor master development will contribute to poor air quality and compliance is achieved. Source: NEPA Assist Air Quality Report.
Coastal Zone Management Coastal Zone Management Act, sections 307(c) & (d)	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The proposed project and master development are not located in a coastal zone and compliance is achieved. Source: NH Granit Coastal Viewer.
Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	A Phase I Environmental Site Assessment (ESA) was completed by Waite Heindel Environmental Management, effective date November 21, 2023 and revealed no Recognized Environmental Conditions (RECs) or Vapor Encroachment Conditions (VECs) in connection with the proposed development. A passive radon mitigation system will be installed in the new buildings and post-construction radon tests will be performed to ensure levels are below the EPA's threshold of 4.0 picocuries/liter. If levels exceed this threshold, the radon mitigation systems will be activated and additional testing will take place to ensure compliance is achieved. Source: Waite Heindel, Phase I ESA.
Endangered Species Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	There is one federally listed endangered species, the Northern Long-eared Bat and one candidate species, the Monarch Butterfly, with potential to be found within the vicinity of the proposed project and master development. Based on the proposed project activities, the project has received a determination of No Effect on the NLEB using the USFWS determination keys.

		Further investigation of candidate species is not required. Additionally, communication with state biologists indicated no concern for any species. Compliance is achieved. Source: USFWS Official Species List; USFWS No Effect Determination Letter; Email Communication with State Biologists.
Explosive and Flammable Hazards 24 CFR Part 51 Subpart C	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	There were no propane Aboveground Storage Tanks (ASTs) over 1,000 gallons in volume visible from the proposed project boundaries. Additionally, based on the most current satellite imagery the subject property is located beyond the Acceptable Separation Distance (ASD) of any bulk ASTs in the vicinity of the project. Source: SRW Thermal/Explosives map.
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The proposed project and master development are located within an urban area and are not subject to the Farmland Protection Policy Act. Source: USCB Urban Areas Map.
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	No 100-year floodplain exists at the proposed project or master development and neither will cause an impact to a floodplain or its natural values. Compliance is achieved. Source: Flood Insurance Rate Map (FIRM) 50007C0251D, dated July 18, 2011.
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	An archaeological study was previously completed for the entire master development by the UVM Consulting Archaeology Program in June 2016 and no further archaeological study was warranted and the proposed project would have no effect on potentially significant cultural resources. A Preliminary Intake Form was also completed and submitted to the Vermont Division for Historic Preservation for this specific location. SHPO made a determination of No Historic Properties Affected. Compliance is achieved. Source: UVM Consulting Archaeology Program End of Field Letter; Preliminary Intake Form.
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The noise sources near the proposed project are the North Avenue and NECR Railroad and a DNL calculation was completed. The noise level at the edge of the proposed project is 59 decibels which is well below the HUD threshold of 65 decibels. The subject property is not located near the noise contours for the Burlington International Airport. Compliance is achieved. Source: DNL Calculation, Definitions, FHWA Vehicle Classifications, Functional Class Averages, AADT; Crossing Inventory; Burlington International Airport Noise Contours.

<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</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>Neither the proposed project nor the master development are located over a sole source aquifer and is not expected to impact any aquifer. Source: EPA Sole Source Aquifer Map.</p>
<p>Wetlands Protection</p> <p>Executive Order 11990, particularly sections 2 and 5</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>There are no federally mapped wetlands on or adjacent to the proposed project or master development. Compliance is achieved. Source: USFWS Wetlands Mapper.</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</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>Neither the proposed project nor the master development are located near any Wild and Scenic River, NRI river, or Study River. Compliance is achieved. Source: NPS Wild and Scenic River; Nationwide Rivers Inventory Maps; Wild & Scenic River Studies.</p>
<p>ENVIRONMENTAL JUSTICE</p>		
<p>Environmental Justice</p> <p>Executive Order 12898</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>Neither the project activities nor the master development will negatively affect a people of color or below poverty population but completion of the project will instead provide a positive impact by providing affordable housing. Within one mile of the subject property the people of color population is estimated at 27% and the low-income population is estimated at 46%. Source: EPA EJScreen General Report.</p>

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
<p>LAND DEVELOPMENT</p>		

Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	According to the City of Burlington's Comprehensive Plan (2014), the vision statement of the housing plan is: "This Plan envisions Burlington as a city where...all people have access to safe, decent and affordable housing... New construction is encouraged in the Downtown and in neighborhood activity centers, and focused on meeting gaps in affordability and design to enhance diversity of housing stock, family types and incomes throughout the city. The designs of new housing blends with the city's built and natural surroundings, are highly energy efficient, and are accessible to people with disabilities" (p. IX-1). The proposed project meets these needs in providing affordable, safe, quality housing just on the outside of downtown Burlington. The subject property is located in a mixed residential and commercial area located just 1.7 miles from downtown and the proposed project is compatible with existing land use and urban design.
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	The subject property has been evaluated by engineers and deemed suitable for development. Standard stormwater management and erosion control practices will be in place during construction activities.
Hazards and Nuisances including Site Safety and Noise	2	The proposed project will not be impacted by known hazards, nuisances or elevated noise levels. Also, while there will be a temporary contribution to community noise levels during construction, long term noise levels will not increase substantially as a result of the intended use of the property. The subject property will have adequate access for emergency vehicles.
Energy Consumption	1	Local energy-efficiency standards add additional requirements to those minimum standards adopted at the statewide level for buildings and energy-consuming equipment in new construction and rehabilitation projects. These go hand in hand with incentive programs to help building owners, architects, developers, and even tenants to achieve higher levels of energy efficiency. The location of the development will encourage in-town transportation methods that do not require burning of fossil fuels. Source: Master Plan.

Environmental Assessment Factor	Impact Code	Impact Evaluation
SOCIOECONOMIC		
Employment and Income Patterns	1	Temporary employment opportunities may result from the project's activities during the construction period, and potentially long term after construction to support the project. The development will increase the population of the workforce which is a benefit to the area.
Demographic Character Changes, Displacement	1	No significant demographic character changes are anticipated due to the increase of 70 residential units. The Cambrian Rise Master project was designed to concentrate residential development at the greater project site, and the proposed project contributes minimally to the demographics change of the surrounding area. It will provide opportunities for any environmental justice populations to secure high quality housing in a location where it was not possible previously, due to a lack of housing stock. This ultimately may result in a more diverse demographic.

Environmental Assessment Factor	Impact Code	Impact Evaluation
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	1	As part of the Act 250 permit process for the master development, a questionnaire was completed by the School Superintendent or Equivalent and stated that there is capacity to accept the additional students created as a result of the Master development. The cultural facilities of the City of Burlington will not be negatively impacted by the proposed project but instead positively by increasing patrons.
Commercial Facilities	1	This proposed project will not have a negative impact on commercial facilities but rather have a positive impact by increasing the number of potential patrons and workforce.
Health Care and Social Services	1	The proposed project will have little impact on the health care facilities in the area. The subject property is located near the UVM Medical Center which is located approximately 2.5 miles away and the Community Health Center at Riverside is located approximately 1.4 miles from the subject property. Additional health and social services exist within the City of Burlington and South Burlington.
Solid Waste Disposal / Recycling	2	Recognizing that solid waste management is a regional issue, Burlington is a member of the Chittenden Solid Waste District (CSWD). The District recently closed a regional lined landfill in Williston and has been attempting to develop another site for several years. Other regional solid waste management facilities that Burlington benefits from include a Biosolids Processing Facility for sludge, a Materials Recovery Facility for commingled recyclables, an Environmental Depot for household hazardous wastes, and composting and a Wood/Yard Waste Depot on the Intervale. Solid waste disposal in Burlington is handled by private waste haulers, with ultimate disposal in various locations. Source: Master Plan. The proposed project will utilize waste dumpsters and not curb side pickup.
Waste Water / Sanitary Sewers	2	The wastewater system consists of three treatment plants (Main Plant on the southern waterfront, East Plant on Riverside Avenue, and North Plant at the far north end of North Avenue), 25 public pumping stations, 5 combined sewer overflow outfalls, and over 92 miles of sanitary and combined sewer lines. Approximately 25% of the city is served by a combined sewer/stormwater system. Collectively, the wastewater system could support an additional approximately 30,000 residents. The proposed project and master development have already obtained a sewer allocation from the City of Burlington. Therefore, the increase of 70 units of affordable housing is not anticipated to overburden the municipal sewer system. Source: Master Plan.

Water Supply	2	The city relies on Lake Champlain to provide its drinking water. The drinking water system consists of the Water Treatment Facility on the northern waterfront, the Main Street Reservoir, and two water towers which are connected by a system of 110 miles of distribution pipes with enough capacity to serve approximately an additional 28,000 residents. The proposed project and master development have already obtained a water allocation from the City of Burlington. Source: Master Plan.
Public Safety - Police, Fire and Emergency Medical	2	The Burlington Fire Station and the Burlington Police Department are located approximately 1.6 miles and 0.8 miles from the subject property, respectively. The Burlington Police Department meets national standards, which recommend two officers per 1,000 residents. Fire department officials believe they have adequate facilities and equipment with which to fight fires as long as building heights do not increase significantly beyond the current maximum heights. The Department has recently begun staffing an additional ambulance to serve the city. The proposed development allows for adequate access by public safety personnel and equipment. Source: Master Plan.
Parks, Open Space and Recreation	2	Burlington contains approximately 980 acres of public parkland. These lands include parks that are developed for intensive public use, as well as property that remains undeveloped for passive recreation and/or conservation purposes. Over 530 acres of this public parkland is owned by the City and managed by the Department of Parks and Recreation. An additional 450 acres is owned and managed by the Winooski Valley Park District, primarily in the form of conservation lands offering access and footpaths to shorelines. Burlington will continue to offer improved walking, biking and recreational opportunities with an eye towards building connections with adjoining communities and protecting streambanks and wildlife travel corridors. Source: Master Plan
Transportation and Accessibility	2	Residents have access to 18 different transit lines, including local and intercity connections to much of Chittenden County, Montpelier, Middlebury, St. Albans, and more via Green Mountain Transit; short-term vehicle rental through Car Share Vermont; access to bicycle rentals for commuting via Green Ride Bike Share, or for recreation via several local businesses; and dozens of traditional cab and technology-based ride hailing services that exist within the city. The city is further connected to the region and beyond via: ferry service connecting downtown to Port Kent, NY via Lake Champlain Ferries; an expanding list of major connecting cities and airlines accessible from the municipal Burlington International Airport, located in South Burlington; passenger rail service for special events, boarding and alighting from the historic train station on the waterfront, as well as freight rail connections and storage; and access to Interstate 89 on the periphery of the city.

Environmental Assessment Factor	Impact Code	Impact Evaluation
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NATURAL FEATURES		
Unique Natural Features, Water Resources	1	The proposed project will not impact any unique natural features or water resources within the vicinity. The subject property will include a public park and is in the ideal location being adjacent to recreational opportunities along the shore of Lake Champlain.
Vegetation, Wildlife	2	The Federally endangered Northern Long-eared Bat and the Candidate species Monarch Butterfly were identified as potentially located in the area but there are no expected impacts. Additionally, there are no concerns for species by state biologists.
Other Factors: Climate Change	2	The proposed project is not at significant risk of climate change induced flooding, as it is not within current 100-year floodplain or proposed Federal Flood Risk Management Standards (FFRMS), which consider future floodplains to be 2 feet vertically higher than existing 100-year floodplains, and as far horizontally as the increased vertical elevation would spread.

Additional Studies Performed: Waite Heindel Environmental Management, Phase I ESA, effective date November 21, 2023; End of Field Letter UVM Consulting Archaeology Program, June 2016.

Field Inspection (Date and completed by): Waite Heindel Environmental Management, November 21, 2023

Cumulative Impact Analysis: The proposed development is part of a Master Plan that includes this and thirteen other buildings. The proposed project helps the master project meet certain requirements for the development of affordable housing and was an important concept of the proposed master plan. It has relied on the successful completion of prior activities associated with the master plan, as will future stages of development. At the time of federalization of this project the entire property has been disturbed, and the majority of site work, utilities and seven buildings have been completed, or are in the later stages of completion. Prior to beginning the master project, the site had been cleared for archaeological resources, wetlands, floodplains, farmland soils and other environmental regulations that overlap with HUD environmental regulations, during the Vermont Act 250 process. It had also been assessed for the majority, if not all of the Environmental Assessment factors required by HUD. This environmental review has considered cumulative impacts in the Environmental Assessment Factors part of the environmental review and for compliance factors the assessment was limited to the property location itself for some resources (e.g. flood insurance, noise, site contamination and explosives) but for the entire master development for others.

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

USFWS Coastal Barriers Resources Act map; Federal Emergency Management Agency; NEPAassist; NH Coastal Viewer; SRW Environmental Consulting LLC Phase I ESA; USFWS Information for Planning and Conservation; U.S. Department of Agriculture Natural Resources Conservation Service; Environmental Protection Agency Sole Source Aquifers map; U.S. National Park Service Wild and Scenic Rivers database; Environmental Justice EJviewer, City of Burlington Comprehensive Plan (2014).

List of Permits Obtained: No permits specific for the Environmental Review are required.

Alternatives [24 CFR 58.40(e); 40 CFR 1508.9] The Burlington College Master Plan has considered this area for housing since 2016, and alternatives to the proposed project were limited by location and previous approvals. Other off-site locations were considered, and plans to build at the City Center location in Downtown Burlington had progressed significantly. However, that project met unsurmountable challenges and a new location for affordable housing was sought. Since this current project was part of an approved master plan dating back to 2016, is in an area already determined to be for housing, including affordable housing, and includes most characteristics which make affordable housing attractive, other off-site locations were not deemed as promising as this location. One on-site alternative considered for the project location area was the potential for market rate housing instead of affordable housing at this specific lot, and placement of affordable housing at another lot in the master plan. Choosing this lot dovetailed with the timing of proposed federal funding and availability and made the most sense to choose.

No Action Alternative [24 CFR 58.40(e)]: If the preferred alternative were not implemented, another parcel in the approved master plan would be developed for affordable housing, as including affordable housing in the master development was a requirement during the permitting process.

Summary of Findings and Conclusions: This HUD Environmental Assessment concludes that an Environmental Impact Statement (EIS) is not required for the project activities associated with this project. A Finding of No Significant Impact has been determined.

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.

Law, Authority, or Factor	Mitigation Measure
Radon	A passive radon mitigation system will be installed in the buildings and post-construction radon tests for all buildings will be performed to ensure levels are below the EPA's threshold of 4.0 picocuries/liter. If levels exceed this threshold, a radon mitigation system will be activated and additional testing will take place to ensure compliance is achieved.
Other	All applicable, local, state and federal permits and approvals shall be obtained, all conditions shall be followed, and all permits shall be closed out upon completion.

Determination: (this will be checked by the ER Preparer/NHHFA):

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.

2/20/2024

ER Consultant Signature: *Todd Scheffer* DocuSigned by: 3A100F6EC3EB4F0... *Kate Fournier* DocuSigned by: 746EE1681F7B47F... Date: 2/20/2024

ER Consultant Name: Kate Fournier and Todd Scheffer

ER Consultant Company: SRW Environmental Consulting, LLC

ER Consultant Address: 143 Rochester Hill Road, Rochester, NH

ER Preparer Signature: *Christine Curtis* DocuSigned by: 993494960347499... Date: 2/20/2024

Name/Title/Organization: Christine Curtis, Senior Community Development Specialist, Community & Economic Development Office, City of Burlington, Vermont

Certifying Officer Signature: *Brian T. Pine* DocuSigned by: 4F6820541B8F4FE... Date: 2/20/2024

Name/Title: Brian Pine, Director, Community & Economic Development Office, City of Burlington, Vermont

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).