



REQUEST FOR PROPOSAL (RFP)

HOME AMERICAN RESCUE PLAN (ARP) PERMANENT SUPPORTIVE HOUSING (PSH) DEVELOPMENT

HOME INVESTMENT PARTNERSHIP PROGRAM (HOME) PERMANENT SUPPORTIVE HOUSING (PSH) DEVELOPMENT

HOME AMERICAN RESCUE PLAN (ARP) SUPPORTIVE SERVICES

HOME AMERICAN RESCUE PLAN (ARP) CAPACITY BUILDING

RELEASED MAY 15, 2025

REQUEST FOR PROPOSAL (RFP)

PERMANENT SUPPORTIVE HOUSING (PSH) DEVELOPMENT

Issued By: Idaho Housing and Finance Association

Issue Date: May 15, 2025

Required Workshops: June 2-6, 2025

Proposal Due Date: August 15, 2025

Introduction

Idaho Housing and Finance Association is seeking proposals from qualified service providers and developers to construct Permanent Supportive Housing (PSH) in Idaho for individuals experiencing homelessness. This initiative aims to provide safe, stable, and affordable housing integrated with supportive services for those that are most vulnerable. Each selected respondent may receive a total of three (3) funding sources: construction, supportive services and capacity building for HOME ARP specific responses.

Proposals are being solicited for the following:

- New construction of affordable rental housing (single family or multifamily units)
- Acquisition and rehabilitation
- Conversion of an existing structure from another use to permanent supportive housing

Project Overview

- **Project Scope:** The selected respondent(s) will develop a PSH project, up to eight (8) units, per community, in Idaho which meet HUD's housing quality standards and federal regulatory requirements. The selected respondents may also be awarded the Capacity Building Grant and Supportive Service Grant, with HOME ARP proposals.
- **HOME ARP PSH Target Population:** The PSH units must house the HOME ARP Qualifying Populations (QP's); more specifically:
 - QP 1: Homeless,
 - QP 2: At Risk of Homelessness,
 - QP 3: Fleeing Domestic Violence, and
 - QP 4: Other Populations
- **HOME PSH** units must serve households earning less than 50% AMI.
- **Construction Funding Availability:**
 - HOME ARP PSH - \$9 Million
 - HOME PSH - \$5 Million
- **Grant Funding Availability: (HOME ARP only)**
 - Supportive Services - \$2 Million
 - Capacity Building - \$500,000 (limited to \$50,000 per nonprofit)

Minimum Eligibility Requirements

- (1) **Eligible Respondents:** Proposals must be submitted by a Nonprofit organization; specifically, a supportive service provider partnering with an experienced developer, preferably one who understands PSH.

- (2) Regulatory Compliance: Projects must adhere to HOME, HOME ARP, and all cross-cutting requirements, including, but not limited to: Fair Housing regulations.
- (3) Supportive Services: The respondent must be the service provider and have a tailored service plan for residents.
- (4) Capacity Building: Respondents must demonstrate a plan for enhancing service provider capacity, including staff training, program sustainability, development of PSH projects and if necessary, hiring additional case managers.

Project Construction

- Construction must begin within 12 months from the execution of the Loan and Regulatory Agreement.
- Of priority to IHFA, development of PSH projects in communities who do not currently have PSH and/or lack the necessary units for their community.
- Project may have up to eight (8) PSH units per community, in Idaho, the number of units requested must be supported by market study(ies).

Per unit subsidy limit:

Any gap between the maximum per unit subsidy limits will require the developer to find additional funding resources.

- HOME ARP PSH units are limited to \$300,000 per unit, regardless of unit size.
- HOME PSH units are limited to the HOME subsidy limits (2024 HUD Published Limits):
 - 1-bedroom: \$208,048
 - 2-bedroom: \$252,993
 - 3-bedroom: \$327,292

Compliance/Affordability Periods

- HOME ARP PSH will have a compliance period of 15 years.
- HOME PSH units will have an affordability period of 20 years.

If projects are compliant through their required periods, IHFA will forgive the loan notes in full. Compliance is described as having met the requirements of the Loan and Regulatory Agreements, in addition to, but not limited to:

- Tenant selection plan
- Following a PSH project specific wait list (Coordinated Entry waitlists cannot be used)
- Property standards met
- Organizational policies and procedures are met for the ongoing operations of the project
- Case management that is client centered and unique for each household

Unit Designation

- HOME ARP PSH units will be *fixed*.
- HOME PSH units may be *fixed* or *floating*, as requested by developer/property manager, depending on the total number of units in the development.

Property Standards

Units (HOME ARP/HOME) must adhere to property standard requirements established in the 2024 Administrative Plan and at [24 CFR 92.251](#) or NSPIRE, whichever is more current.

Inspections will be required during construction and during the compliance/affordability periods.

Environmental Review

HOME ARP funds may not be used until the Part 58, environmental review has been completed. No written agreements will be executed until this is completed. Respondents should not enter into any agreements with contractors, property agreements, etc. until this is completed; otherwise, it may render the project ineligible for a “Choice Limiting Action.” This cannot be negotiated, waived, or exempted.

For rental housing developments, Project Sponsors (prior to application for funds) must submit [Attachment A](#) with the HOME Programs Environmental and Project Finance Specialist to provide a preliminary review of the site. The preliminary review will minimally evaluate:

- Sources of noise requiring mitigation
- Sources of potential site contamination
- Past uses of the site
- Lead/asbestos abatement requirements

IHFA is a Responsible Entity for HUD-CPD housing development programs in Idaho. As such IHFA is responsible for determining if a HUD-CPD funded project has adverse human health or environmental impact by completing an Environmental Review (ER). If it is determined a project may have adverse human health or environmental impact, the project may be rejected or require mitigation.

The project proposal **must** include a detailed project description. Project descriptions lacking in detail may delay the Environmental Review process. This must include all contemplated actions which are either geographically or functionally part of the project. This includes actions that are not HUD-funded and before, during, or after IHFA’s involvement. One example may be land acquisition under other funding, private or federal. Another example may be this is one phase of a larger project plan.

No work to the site may occur after the submission of application to IHFA and prior to the completion of the ER. **No funds** can be committed to an activity before the completion of the Environmental Review Process and IHFA determines that the project has Environmental Clearance. IHFA will notify the project sponsor when Environmental Clearance is obtained.

Section 3

Section 3 is required for both HOME ARP and HOME funded units. Section 3 requires that economic opportunities generated by certain HUD financial assistance (including Public and Indian Housing) and community development programs shall, to the greatest extent feasible, be given to low and very-low income persons, particularly those who are recipients of government assistance for housing, and to businesses that provide economic opportunities for these persons. **This is a statutory requirement for the award of jobs and contracts generated from projects that receive HUD funding.** The Section 3 regulations are found at [24 CFR Part 75](#).

Project Completion

PSH projects must meet the definition of project completion at [24 CFR 92.2](#). If the Developer/Property Manager fails to complete a project within four (4) years of project commitment, it must comply with the terminated project requirements at [24 CFR 92.205\(e\)\(2\)](#). If PSH units are not occupied by eligible qualifying households or low-income households within six (6) months following project completion, IHFA must submit to HUD information on its efforts to coordinate with a CoC, homeless service providers, social service, and other public agencies to fill units for qualifying households. IHFA will require repayment any HOME/HOME ARP funds invested in units not rented to eligible qualifying or low-income households within 12 months of project completion.

Affordability Period Requirements

Qualifying Populations

Unlike other development applications, the only requirement for a tenant to reside in the HOME ARP PSH unit, is meeting a definition of homelessness. *These are different from ESG/CoC, it will be imperative to understand the definitions for HOME ARP.*

This means eligible tenants may not have an income. Property Managers/Development teams will need to understand this, as unless there is another federal source requiring income; it cannot be a requirement for a tenant to reside in the unit. HOME ARP qualifying population definitions are as follows:

(1) Homeless

As defined in 24 CFR 91.5, homeless is defined as:

- (1) An individual or family who lacks a fixed, regular, and adequate nighttime residence
- (2) An individual or family who will immediately lose their primary nighttime residence
- (3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition but who qualify as section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a).

(2) At Risk of Homelessness

As defined by 24 CFR 91.5:

- (1) An individual or family who:
 - a. Has an annual income below 30% of [area median income](#) (AMI), as determined by HUD;
 - b. Does not have sufficient resources or support networks, (e.g. family, friends, faith-based or other social network) immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the “Homeless” definition in this section; and
 - c. Meets one of the 7 conditions described under this definition.
- (2) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 387(3)
- (3) A child or youth who does not qualify as “homeless” under this section but qualifies as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2))

(3) Feeling, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Humna Trafficking

(4) Other Populations

Where providing supportive services or assistance under section 212(a) of NAHA (42 U.S.C. 12742(a)) would prevent the family’s homelessness or would serve those with the greatest risk of housing instability. HUD defines these populations as individuals and households who do not qualify under any of the populations above but meet one of the following criteria:

- 1) Other Families Requiring Services or Housing Assistance to Prevent Homelessness – defined as households (i.e., individuals and families) who have previously been qualified as “homeless” as defined in 24 CFR 91.5, are currently housed due to temporary or emergency assistance, including financial assistance, services, temporary rental assistance or some type of other assistance to allow the household to be housed, and who need additional housing assistance or supportive services to avoid a return to homelessness.
- 2) At Greatest Risk of Housing Instability – a household who meets either paragraph (a) or (b) below:
 - a. Has an annual income that is less than or equal to 30% of the area median income, as determined by HUD and is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income towards housing costs);
 - b. Has an annual income that is less than or equal to 50% of the area median income, as determined by HUD, and meets one of the 7 conditions (as found in 24 CFR 91.5) – “At risk of Homelessness”.
- 3) Veterans and Families that include a Veteran Family Member that meet criteria for one of the qualifying populations described and are eligible to receive HOME ARP assistance.

Housing Occupancy Requirements/ Rent Limitations/Lease up

HOME ARP PSH units are restricted for household meeting a qualifying population definition during the compliance period (minimum of 15 years). Qualifying households are eligible for admission to HOME ARP rental units solely by meeting the definition of one of the qualifying populations at rental application (HOME ARP, does not impose income restriction on units restricted for qualifying populations).

HOME PSH units are restricted for households earning less than 50% AMI during the compliance period (minimum of 20 years).

Wait Lists

Developers/Property Managers will need to maintain project specific PSH waitlists. CoC/ESG Coordinated Entry lists **cannot** be used, given the differences in definitions. Further, the HOME regulations require all applicants must apply for the available housing unit and served on a “first-come; first-served” basis in so far as practicable. *Households on CoC/ESG waitlists may apply after referred from Coordinated Entry, but the application by the prospective tenant is accepted in the order it is received and placed on the PSH waitlist.* This is due to the different definitions between the programs. Finally, as IHFA did not identify preferences or allow referrals as part of its HOME ARP Allocation Plan to HUD, projects must be able to serve all qualifying populations of homelessness.

HOME ARP PSH units, this means:

- All units must be available to those who meet a qualifying definition of homelessness;
- Waitlists must be separate from other waitlists for other units/projects; and
- Waitlists must be followed in chronological order, insofar as practicable.

HOME PSH units:

- A waitlist will need to be used for the project;
- Coordinated Entry may be used, but applicants still must apply and be placed in chronological order on the waitlist; and
- Waitlists must be followed in chronological order, insofar as practicable.

Determining Household Income

Annual rent limits will be published by HUD and found on IHFA's website:

<https://www.idahohousing.com/federal-programs/home-program/>

HOME ARP Initial Lease-Up

HOME ARP units are restricted for households meeting a qualifying population definition during the compliance period (minimum of 15 years). Qualifying households are eligible for admission to HOME ARP rental units solely by meeting the definition of one of the qualifying populations (i.e., HOME ARP, as described, **does not** impose income restrictions on units restricted for qualifying populations). If there is no income requirement in the qualifying population's definition, the Developer/Property manager **is not required** to perform an initial determination of household income, unless another funding source requires income restrictions (e.g., LIHTC/PBVs).

Rents charged to qualifying populations are limited to no more than 30% of the tenant's adjusted income. Qualifying homeless definitions 2 and 4, limit household income to 50% AMI. As such, if a household exceeds 50% AMI, they more than likely do not meet the qualifying definition of homelessness. This is different from HOME. It is imperative that both Developers and Property Managers understand the differences in definitions and programs.

Units need to be leased within six (6) months of project completion and if units are not rented within twelve (12) months HOME ARP funds must be repaid within 12 months of project completion. For households meeting a definition, which requires income, **adjusted income** will need to be calculated.

HOME Initial Lease-Up

HOME PSH units are limited to income eligible households at each initial lease-up, earning less than 50% AMI during the Period of Affordability (20 years). Units need to be leased within six (6) months of project completion and if units are not rented within 12 months HOME funds must be repaid within 12 months of project completion. For determining income, **anticipated income** is used.

Change in Income and Over-income Households

HOME ARP Units

Households whom met the definition of one of the HOME ARP qualifying populations at initial occupancy and whose annual income at the time of income re-certification is above 50% of median income for the area but at or below 80% of the median income for the area must pay the rent specified in [24 CFR 92.252](#).

HOME ARP-assisted units restricted for low-income households (less than 80% AMI) continue to qualify as HOME ARP rental housing despite a temporary noncompliance caused by the increase in the households income if actions satisfactory to HUD are taken so all vacancies are filled in

accordance with HOME ARP requirements until the noncompliance is corrected. A resident cannot be evicted due to becoming over-income.

A qualifying or low-income household who is not low-income at the time of income re-certification (i.e., whose income is above 80% of the median income for the area) must pay rent which complies with the over income regulatory requirements at [24 CFR 92.252\(i\)\(2\)](#), which includes requirements applicable to HOME units and also may have LIHTC restrictions.

HOME Units

A qualifying or low-income household not low-income at the time of income re-certification (i.e., whose income is above 80 percent of the median income for the area) must pay rent which complies with the over income regulatory requirements at [24 CFR 92.252\(i\)\(2\)](#), which includes requirements applicable to HOME units which may also have LIHTC restrictions.

HOME units restricted for low-income households continue to qualify as PSH rental housing despite a temporary noncompliance caused by increases in the incomes of existing households if actions satisfactory to IHFA and HUD are taken so all vacancies are filled in accordance with HOME PSH requirements until the noncompliance is corrected. A resident cannot be evicted due to becoming over-income.

Rent Limitations

Rent limits for HOME ARP units are restricted for qualifying populations and HOME units are restricted for low-income households.

HOME ARP PSH:

In no case can the HOME ARP rents exceed 30% of the adjusted income of a household whose annual income is equal to or less than **50%** (this is different than HOME) for the median income of the area, as determined by HUD, with adjustments for the number of bedrooms in the unit. HUD will publish the HOME rent limits on an annual basis.

The rent limits for HOME ARP units for qualifying households include the rent plus the utility allowance.

HOME PSH:

HOME PSH units occupied by low-income households must comply with the rent limitations in [24 CFR 92.252](#) i.e., the lesser of the Fair Market Rent for existing housing for comparable units in the area, as established by HUD, or a rental equal to 30% of the income of a family at 65% of median income for the area, as determined by HUD, with adjustments for number of bedrooms in the unit).

If the HOME PSH unit utilizes a federal or state project-based assistance (i.e. voucher), the Developer/Property Manager may charge project-based rents if:

- it is a Low-HOME unit (<50% AMI)
- is occupied by a very Low-Income tenant (<50% AMI) and
- tenant does not pay more than 30% of adjusted income for rent.

The rent limits for low-income households apply to the rent plus the utility allowance.

Rent Limitations after Year 1

HOME ARP and HOME will be required to review household eligibility and income each year during the compliance/affordability period.

HOME ARP PSH:

For purposes of establishing the qualifying household's rental contribution after initial occupancy, a Developer/Property Manager must examine a HOME ARP qualifying household's income. This will start the first year after lease-up. Further, this is only for verification of the tenant rent portion. As long as the tenant met a qualifying population definition at initial lease-up, they are still qualified to rent the unit.

Should the project not have vouchers, the Developer/Property Manager will need to annually review income following [24 CFR 92.203\(b\)\(c\) and \(f\)](#).

HOME PSH:

For consistency, the income of each low-income household must be determined as outlined in the Loan and Regulatory Agreement.

Should a HOME ARP or HOME PSH unit have other federal programs stacked in the project, the HOME department will collaborate with the other funding sources to reduce the administrative burden where feasible. All final determinations will be outlined in the Loan and Regulatory Agreement.

Initial Rent Schedule and Utility Allowance

The Developer/Property Manager must establish maximum allowances for utilities and update the allowance annually. The Developer/Property Manager may adopt the utility allowance schedule of the PHA for HOME ARP units. *This is different from HOME.*

IHFA must review and approve rents proposed by the Developer/Property Manager subject to the HOME/HOME ARP rent limitations. For HOME ARP units where the tenant is paying utilities and services (e.g., trash collation), the Developer/Property Manager must determine the rent for the unit does not exceed the maximum rent minus the monthly allowance for utilities and services.

HOME PSH units will still require the Developer to use HUD Utility Schedule Model or other methods approved by IHFA for the utility allowance.

Annually, the Developer/Property Manager will need to seek approval of any [rental increases](#).

Property Management/Supportive Services

At the head of PSH is the wholistic approach to providing wrap-around supportive services – meeting clients where they are at. To ensure effective operations and long-term stability of Permanent Supportive Housing developments, all respondents must submit detailed information regarding their property management and supportive service provider arrangements. The property management company, nonprofit, and developer must enter into a Memorandum of Understanding (MOU), the MOU must include:

- Defined roles and responsibilities
- Communication plan
- Shared goals for housing stability
- Confidentiality and data sharing policies
- Duration of the agreement and renewal process
- Prioritizing case management
- Eviction protection
- Subsidy terms
- An agreed upon lease agreement, which must include:
 - Core lease components:
 - Term of lease
 - Tenant Name & unit address
 - Rent amount
 - Security deposit
 - Tenant Rights
 - Utilities and maintenance responsibilities
 - Termination for cause only
 - Grievance/appeals process
 - Right to privacy
 - Fair housing and ADA compliance
 - Community living standards
 - Supportive Housing lease additions:
 - Voluntary service clause
 - Non-discrimination
 - Reasonable accommodation language
 - Eviction protection
 - Subsidy terms

A sample has been provided in the Procorem WorkCenter.

Supportive Services

During the entire period of affordability (POA), PSH units are required to offer supportive services, but the tenants are not required to participate as a condition of their housing. Each selected respondent is **required to provide at least three (3) supportive service models**. This model should demonstrate how a unique supportive service plan will be adapted to each client residing in a PSH unit. During the compliance period client files must be kept to ensure compliance with the PSH requirements and the Loan and Regulatory Agreement. At a minimum client files are required to have the following:

- Application
- Determination of meeting qualifying population definition
- Income (if no income, self-certification)
- Identification of supportive service needs
 - Documentation of referrals
- Treatment plan
- Case management notes/goals
- Release of Information (ROI) for case conferencing

Supportive Service Model Examples:

1. Intensive Supportive Services (High-Need Population)

Target Population: Chronically homeless individuals with co-occurring mental health and substance use disorders.

Services Provided:

- On-site case management (daily availability)
- 24/7 crisis intervention support
- Integrated behavioral health services (on-site or mobile teams)
- Medication management and psychiatric care
- Substance use recovery support groups
- Life skills training (cooking, budgeting, conflict resolution)
- Transportation assistance to medical and service appointments
- Weekly service planning meetings tailored to individual goals

2. Moderate Supportive Services (Transitionally Homeless Individuals/Families)

Target Population: Individuals or families recently experiencing homelessness, but with fewer complex health needs.

Services Provided:

- Weekly case management check-ins
- Connection to community-based mental health and primary care providers
- Employment readiness support (resume writing, job training referrals)
- Financial literacy workshops
- Monthly tenant meetings and peer support groups
- Assistance accessing benefits (e.g., SNAP, Medicaid)
- Limited on-site services, with a referral network for additional needs

3. Limited Supportive Services (Low-Need Population)

Target Population: Individuals exiting homelessness who are largely independent and require minimal support.

Services Provided:

- Monthly case management check-ins
- Referrals to community resources as needed (e.g., food banks, clinics)
- Quarterly life skills or wellness workshops
- Tenant support hotline during business hours
- Annual service plan reviews and goal setting
- Assistance with lease renewal and tenancy issues

Partnerships

The nonprofit organization will serve as the primary respondent. The developer is responsible for completing the construction portion of the proposal. Throughout the construction phase and the period of compliance, the nonprofit will act as the subrecipient and will be responsible for reviewing the developer's draw requests. After the nonprofit's review, the draw must be submitted to IHFA for final review and approval. Once approved, IHFA will notify the nonprofit, who may then release the funds to the developer.

To ensure a clear separation of duties and responsibilities, the nonprofit and the developer are required to enter into a Memorandum of Understanding (MOU).

The MOU must also outline the specific partnership model that the nonprofit and developer will follow. Examples of acceptable partnership models include:

A.

- **Nonprofit (Respondent):** Supportive service provider, draw management and disbursement of funds, and property management.
- **Developer:** Construction only.

B.

- **Nonprofit (Respondent):** Supportive service provider and draw management/disbursement of funds.
- **Developer:** Construction and property management.

C.

- **Nonprofit (Respondent):** Supportive service provider and draw management/disbursement of funds.
- **Developer:** Construction only.
- **Property Manager:** Property management.

Application Scoring

IHFA will provide a workshops during the RFP to familiarize Developers/Property Managers/Supportive Services providers with the process and requirements of the funding.

Participation is mandatory prior to responding. Responses will not be accepted if all parties did not participate in the workshop.

IHFA reserves the right not to review incomplete applications submitted by organizations and/or participants who do not fulfill workshop requirements.

Minimum Threshold Requirements

1. Development experience with PSH projects.
2. Development experience and capacity with federal funds.
3. Ability to leverage multiple funding sources.
4. CPA-Reviewed Financial Statements submitted. IHFA will ensure adequate financial management systems and practices in place as well as sufficient financial resources to carry out the project to completion.
5. Ability to be reimbursed for eligible costs during development.
6. Unit sizes are reflective of the community needs for PSH
7. Comprehensive plan for supportive services

IHFA will select projects and respondents which best meet the requirements of the RFP. IHFA is not obligated to utilize all funds made available in this RFP.

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Section #1 – Project Site Information

Include the following information. Check the box beside each item to indicate the information has been provided to IHFA.

- ☐ Complete legal description if available.
- ☐ Property address for the site. If the address has not been issued or is too new to find on satellite imaging, the provide the closest searchable address and a map showing relation to the site.
- ☐ Detailed Google and Plat maps of the exact location of the proposed site.
- ☐ All contemplated actions that will be part of the projects (i.e. new construction, acquisition only, acquisition repair/rehabilitation, reconstruction, demolition, infrastructure, etc.) including any action(s) taken before and after IHFA involvement.
- ☐ Historical (past) uses of the site back to 1940.
- ☐ Indicate all sources of federal funds that might be used in this project.
- ☐ Storm water drainage plan (new construction).
- ☐ Description of materials to be used.

Applicant Name: _____

1. Project Name: _____

2. Project Site Location(s): _____

3. Contact Person: _____

4. Address: _____

5. Telephone Number: _____

6. Email Address: _____

Section #2 – Project Federal FundingHOME Funds: Yes ☐ No ☐ Anticipated Amount: \$ _____HOME ARP Funds: Yes ☐ No ☐ Anticipated Amount: \$ _____Other Federal Funds: Yes ☐ No ☐ Anticipated Amount: \$ _____

(i.e. CDBG, PHA Vouchers, etc.)

Total Proposed Federal Funding: \$ _____

Total Non-Federal Funding: \$ _____

Total Project Cost from all sources: \$ _____

Section #3 – Environmental Factors and Threshold Information**Environmental Factors & Threshold Form***IHFA will complete the environmental review.**This checklist is the preliminary tool to indicate potential environmental issues and nuisances with a potential project site. Please provide a “yes” or “no” response to each threshold item below. If a factor or threshold is unknown or not applicable, indicate in the “Comments” column.*

FACTOR	THRESHOLD	YES OR NO	COMMENTS
NOISE	a. Freeway or busy road within 1,000 feet.		
	b. Railroad within 3,000 feet.		
	c. Airport within 2,500 feet.		
	d. Any other noise sources threshold criteria		
RAILROADS	Identify any railroad lines within 3,000 feet from the subject property. Identify the location of the right of way in relation to the project property line.		
HISTORIC PRESERVATION	a. The site is known or suspected to contain archaeological resources.		
	b. Site is in, or is adjacent to, an established or proposed historic district or conservation district.		
	c. Site/existing building is known to be listed in the National Register of Historic Places, or is listed in a local cultural resources inventory.		
	d. Site currently has any structure on it which is 45 or more years old.		
LEAD-BASED PAINT	Was the structure built before January 1, 1978?		
FLOODPLAIN	ANY part of the site or integral offsite development is known to be located		Flood insurance is required until the final <i>Letter of Map Revision</i> is

	within the 100-year floodplain (a 500-year flood for critical actions) or a FFRMS floodplain.		provided to IHFA, if this is an option.
WETLANDS	ANY portion of the site or integral offsite development is known to include jurisdictional wetlands. ("Wetlands" are distinguished by water, vegetation, and soil conditions, and may not be readily apparent to the lay person).		In all cases, the wetlands must be delineated.
ODORS	The site is within a mile of odor producing facilities (dairies, asphalt plants, industrial facilities, sewage treatment, etc.).		
HIGH VOLTAGE POWER TRANSMISSION OR OTHER TOWERS	Site is within the fall distance of towers.		All residential structures must be outside the engineer fall distance of any tower.
EXPLOSIVE OR FLAMMABLE HAZARDS	Within a one-mile radius of the site, is there a direct line of sight from any part of the site to any hazard, which is not shielded from the site by topography. A hazard is any above ground storage tank (AST) over 100 gallons capacity, which stores, handles, or processes explosives or fire prone substances.		
NATURAL GAS OR PETROLEUM PIPELINES	Identify and high-pressure pipeline within 220 yards of the closest building.		All structures must be at least 10 feet from the outer boundary of any pipeline easement. Provide architect or engineer certification that design is in compliance with condition.
CONTAMINATED SITES	Site is suspected or is contaminated with a hazardous substance or petroleum product – Reference Phase I Environmental Assessment.		If yes, a Phase II investigation to determine the extent of contamination and possibly a Phase III remediation.
SITE EXCAVATION	Construction requires site excavation.		Indicate the anticipated depth.
LANDFILLS	Site is within a mile of an operating or closed landfill.		If yes, please identify the location of the landfill to the proposed site.
RADON	The project is located in a county which has a higher than recommended average.		Radon testing is required for all projects and mitigation is required if levels are higher than 4 pico curies per liter/

OTHER CONCERNS	The project site location is in an area of high fire hazards, unstable soils, or any other concerns.		
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Section #4 – Alternative Site Analysis

Environmental Review will include analysis of other reasonable courses of actions that were considered but not selected, such as other sites, design modifications, or other uses of the subject site. It must also describe the benefits and adverse impacts to the human environment of each alternative and the reasons for rejection [[24 CFR 58.40\(e\)](#)].

Please see Annual Administrative Plan- Exhibit R- Alternative Site Analysis