


Environmental Review Training

For those using:
USDA-RD, IDED-CDBG, and/or IDNR/IFA-SRF
For Water or Wastewater Infrastructure Projects
8/26/2010

Alphabet Soup? Please Ask

USDA	NEPA		CLG	USACE
RD	CONACT		EPA	CX
	SHPO		SRF	
ERS	FNSI		EIS	CDBG
NRCS	IDNR/IFA		USFWS	LAA
404	HUD		EID	IUP

Housekeeping

- If you are having problems with the connection (audio or video), please call: 515-418-5226 and speak with the specialist.
- Participant audio lines will be muted until the Q&A session
- If you have a question—please:
 - “Raise your hand”—we’ll call on you during Q&A time at the end
 - Type your question in the chat box

Overview of Environmental Review

- Required to comply with:
 - National Environmental Policy Act of 1969 (NEPA)
- Each Federal Agency is empowered by Congress to devise its own way of complying



So naturally—
They all do things differently!





So--how do you know what to do?



Whose Rules Do We Follow?



Who Is the Agency In Charge?

- Depends on the Program!
 - Rural Development (RD) is funded through US Dept. of Agriculture (USDA)

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Who Is the Agency In Charge?

- Community Development Block Grants (CDBG) are funded through Housing and Urban Development (HUD) and administered locally by the Iowa Dept. for Economic Development (IDED)

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Who Is the Agency In Charge?

- State Revolving Fund (SRF) is funded through Environmental Protection Agency (EPA) grants and administered locally by the Iowa Dept. of Natural Resources (IDNR) and the Iowa Finance Authority (IFA)



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Three Different Agencies

=

Three Different Sets of Rules!

Who is Responsible for ER?

ER Responsible Party

- For USDA-RD—
 - The applicant is responsible for the vast majority of ER preparation
 - A grant administrator may be hired to do this
 - USDA regional office will consult with SHPO

ER Responsible Party


- For IDED-CDBG—
 - The applicant (recipient) is responsible for ER preparation
 - A grant administrator (responsible entity) is hired to do this
 - The grant administrator (responsible entity) will consult with SHPO

ER Responsible Party

- For IDNR/IFA-SRF—
 - The applicant is responsible—but IDNR has staff to assist with this as a service to the applicant
 - IDNR will consult with SHPO

When Should ER Be Done?

When is the Right Time for ER?



- Depends on the Agency—when in doubt—ASK!
 - Pre- or post- application for funds
 - Pre- or post- award of funds

It must always be complete before any construction occurs!

Right Time—USDA-RD

- For USDA, ER should be completed before the full application is submitted to the regional office
- SHPO submittals must be prepared by the applicant, but the USDA regional office will submit it to SHPO

Right Time—IDED-CDBG

- For CDBG, ER can be completed before grant application or after award
- If ER is prepared before grant application:
 - It increases the project's readiness and increases its chances of being funded
 - However, the cost of preparation pre-award isn't an eligible expense.
- If ER is completed after grant award, the cost is an eligible expense

Right Time—IDNR/IFA-SRF

- For SRF, ER may be completed by the applicant, or completed by SRF ER services personnel post-IUP-application.
- ER is usually completed concurrently with DNR technical review
- ER must be completed before a loan can be executed

What If We Aren't Doing Anything Big?

Categorical Exclusions

- For some project scopes, agencies have Categorical Exclusions (CX or CE) that are shorter processes for Environmental Review.
- The terms of these differ greatly from agency to agency.
- If there is any possibility that a Categorical Exclusion may apply—talk with the agency.

Categorical Exclusions

- Those that do not qualify for a Categorical Exclusion, must go through an Environmental Assessment process.
- Again, this varies from agency to agency.
- The Environmental Assessment process will result in a Finding of No Significant Impact (FNSI) or an Environmental Impact Statement (EIS)

Any Other Differences?

How does Section 106 differ?

- While consultation with SHPO is basically the same, there are some significant differences.
- USDA has a PA that exempts certain work from SHPO consultation
- If the PA applies=



How does Section 106 differ?

- CDBG has a PMOU that exempts certain work from SHPO consultation
- If the PMOU applies=

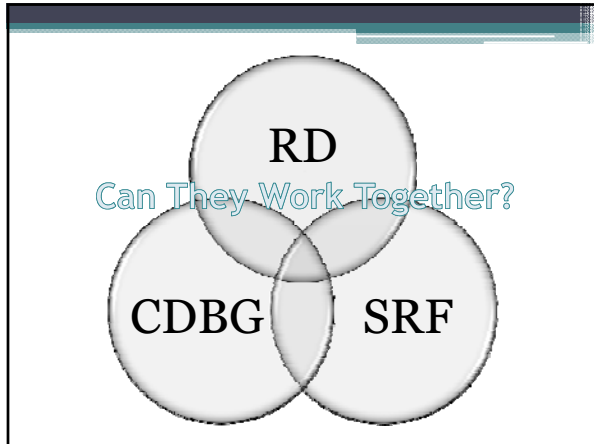


How does Section 106 differ?


- SRF is willing to contract for archeological work through the Phase I and architectural history work through a Reconnaissance survey at no expense to the applicant.



- But no PA or PMOU



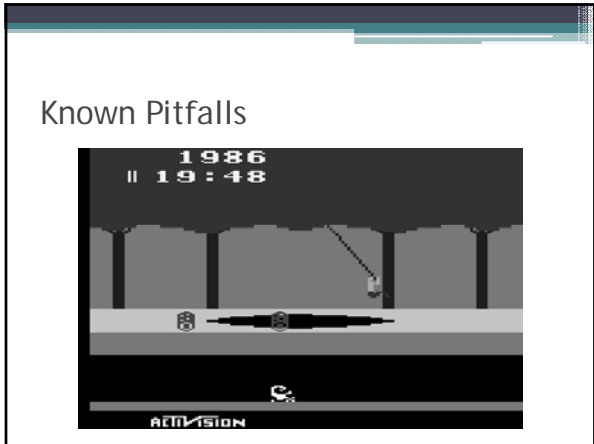
Section 106 Lead Agency Status

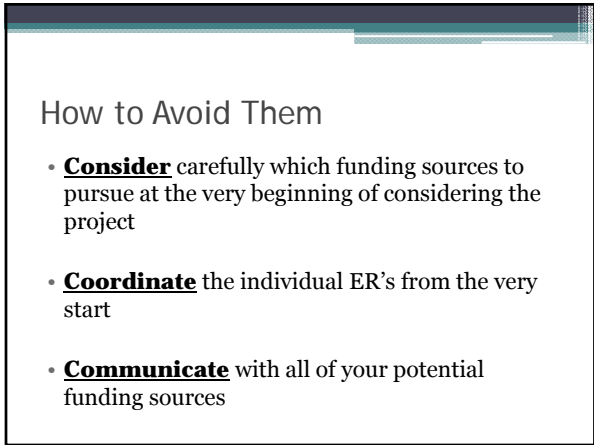


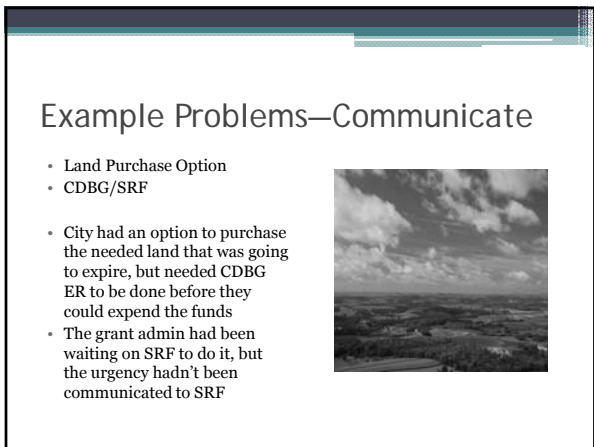
- When co-funding, a Lead Agency Agreement form should be signed.
- The Lead agency will be the only one to consult with SHPO; the others will piggy-back.

Section 106 Lead Agency Status

- As USDA and CDBG have agreements with SHPO that may apply, sometimes its best to make them Lead.
- Selecting Lead should be done carefully with attention to timelines, existing agreements w/SHPO, and applicant needs.







Example Problems—Coordinate

- Floodplain Publications
- CDBG/USDA
- A City had completed the appropriate Floodplain publications for CDBG (15 days and 7 days)
- Then they had to repeat the process for USDA (30 days & 15 days)



Example Problems—Consider

- Wetlands
- CDBG/USDA or SRF/USDA
- While CDBG and SRF can allow for wetland destruction with conditions, USDA cannot
- Up-front planning to avoid wetlands could keep the USDA funding source as an option



NEPA and Other Laws



- NEPA is an umbrella law
 - Many other laws are encompassed under it
 - Some laws, like the Endangered Species Act apply to all Federal actions
 - Others apply only to particular Agencies (Like the CONACT)
- Make sure you know which laws apply!

Environmental Review

Benton Quade
515.725.3073
benton.quade@iowa.gov

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National Environmental Policy Act

- Determine the effect of the federal undertaking on the human and natural environment.
- Ensures that environmental information is available to public officials and citizens BEFORE decisions are made and BEFORE actions are taken.
- Helps public officials make decisions with an understanding of environmental consequences.
- This law applies to all CDBG recipients.

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Why Environmental Review

- Avoid or mitigate environmental impacts that may harm our clients.
- Avoid or mitigate any harm to the surrounding environment.
- Avoid litigation that could stop project on environmental grounds.

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Why Environmental Review cont.

- Avoid monitoring findings and sanctions.
- Secure the value of the public investment.
- It's the LAW!

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What NEPA Applies To...

- All proposals for Federal actions that have the potential to affect the quality of the human environment.
- No "trigger level" – All levels of Federal funding and assistance are covered: including small grants and loans, loan guarantees, permitting, and so on.

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Terms and Definitions

- Project – an activity or group of activities
- Environmental Review – review of the project
- Recipient – entity receiving assistance from HUD
- Responsible Entity (RE) – unit of general local government
- Certifying Officer – responsible agency official
- Environmental Review Record (ERR) – written record of review, decision-making and action.

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Assumption Authority

- RE assumes HUD's authority by executing a grant agreement (as Recipient) and/or by certification of the RROF.
- RE assumes responsibility for:
 - Environmental review
 - Environmental decision-making
 - Environmental action that would apply to HUD under NEPA and related laws

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Limitation on Activities Prior to Clearance

- Recipient may not commit HUD or non-HUD funds on an activity prior to approval if the activity would have an adverse environmental impact or limit the choice of reasonable alternatives.
- This limitation is rooted in all NEPA related authorities – Don't take action until compliance is achieved.

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Environmental Review Record

- Written record of the environmental review undertaking for each project
- Shall be available for public review
- Shall contain all the environmental review documents, public notices, determinations or findings as evidence of review.

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Contents of ERR

- Project description including precise location or target area and maps.
- Photographs, site plans, elevations.
- Documentation of compliance with authorities and requirements.
- Reports, environmental assessment
- Written determinations and findings
- Public notices, RROF, correspondence, Authority to use grant funds (award letter)

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ERR is a legal document

- ERR may be subpoenaed and subject to scrutiny by a court of law
- ERR is your only proof of compliance with the procedural provisions of Federal environmental law and your defense against environmental challenges.

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Step by Step

1. Conditional award letter arrives
2. Procure: administrator, architect, engineer
3. Determine the scope of the project
4. Determine the level of review
5. Sign Lead Agency Agreement if local funding comes from USDA-RD or SRF

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Step by Step cont.

- 6. Complete Environmental Review
- 7. Distribute Notices
- 8. Submit Request for Release of Funds
- 9. Funds released by IDED

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Step One Awards are Issued

- Awards for the Water/Sewer and Community Facilities under the annual allocation are announced sometime in the Spring (~ March – April).

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Step Two - Procurement

- **ONLY** procure and sign contracts for the administrator, architect, engineer after awards
- **ONLY** incur costs for:
 - Administration
 - Engineering
 - Architectural design
 - Archeological surveys and other expenses related to completing the environmental review
- The costs incurred are CDBG reimbursable once you receive the final grant award notice and a CDBG contract has been executed

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REMEMBER

NO other construction related costs can be incurred before IDED has released funds including:

- Acquiring property
- Demolishing structures
- Signing construction contracts
- Starting construction

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Step Three

Determine Scope of work

- “Project” means an activity, or a group of integrally related activities, designed by the recipient to accomplish, in whole or in part, a specific objective
- For purposes of environmental review, the project includes both HUD and non-HUD funds.

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Step Four

Determine the Level of Review

- Fill out Determination of Level of Review form (The following need to be cited from the Regulations why it does not require an Environmental Assessment.
 - Exempt
 - Categorically Excluded NOT Subject to 58.5
 - Categorically Excluded Subject to 58.5

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Step Five
Lead Agency Agreement

- Local funds = USDA-RD or DNR SRF
- Lead Agency Agreements in the Management Guide:
 - DNR & CDBG for Section 106
 - USDA-RD & CDBG for Section 106
 - USDA-RD & CDBG Environmental Assessment Compliance

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Step Five
Lead Agency Agreement

- Process for signature:
 - CDBG Recipient signs (Mayor or CEO)
 - Grant Administrator signs
 - Other agency representative signs (DNR or USDA)
 - IDED signs: send original to Benton Quade

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Step Five
Lead Agency Agreement

- **USDA** can be the Lead Federal Agency for both Section 106 and Environmental Review
- Receive documents/Review documents
- Make a Finding of No Significant Impact (FONSI)
- **REMEMBER:** All agencies will publish their own FONSI

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Step Five
Lead Agency Agreement

- If the RE is going to use **IDNR's** documentation
- Receive documents/Review documents
- Fill out IDED's EA Worksheet, you can use IDNR's documentation. (Sect. P and Q)
- Make a Finding of No Significant Impact (FONSI)
- **REMEMBER:** All agencies will publish their own FONSI

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Step Six
Complete the Environmental Review

1. Review Environmental Laws & Regulations:
www.hud.gov/offices/cpd/environment/index.cfm
2. Review CDBG Management Guide:
www.iowalifechanging.com/community/community
3. Start an Environmental Review Record
 - Determine the level of review:
 - a. Exempt
 - b. Categorically Excluded - Subject to, Not Subject to the Related Laws and Regulations
 - c. Complete EA Worksheet

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Step Six
Complete the Environmental Review
EA Worksheet

Organizing the Worksheet

- Page 1: Coversheet with project name
- Page 2: Policy and assessment criteria
- Page 3: Table of Contents
- Page 4: Sections I and II of worksheet
- Remaining Pages: Section III with appendices

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Step Six
Complete the Environmental Review
EA Worksheet

Section 1: Purpose and Need

- Summarize the project
- Include a project map: <http://ortho.gis.iastate.edu>
- Discuss the need for the project

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Step Six
Complete the Environmental Review
EA Worksheet

Section II: Alternatives to the proposed project

- List the alternatives and why they were not chosen
- Include the alternative of “no action”

These can be found in engineering reports or community assessments

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Step Six
Complete the Environmental Review
EA Worksheet

Section III: Resource Criteria A to Q

- Farmlands Protection
- Wild and Scenic Rivers Act
- Floodplain Management
- Wetlands Protection
- Historic Properties
- Endangered Species
- Water Quality
- Coastal Zone Management
- Environmental Justice
- Air Quality

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Step Six
Complete the Environmental Review
EA Worksheet

Section III: Resource Criteria A to Q:

- **Assessment Questions** – yes/no answers
- **Mitigation** – describe if applicable
- **Documentation** – describe and list appendix number
- **Rating:**
 - 0 =No Impact Anticipated
 - 1 =Potentially Beneficial Impact
 - 2 =Potentially Adverse Impacts: easily mitigated
 - 3 =Moderate Adverse Impacts: mitigated by special measures
 - 4 =Major Adverse Impacts: can't be mitigated
 - N/P =Resource Not Present: after investigation.
- **Contact or information source**

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Step Six
Complete the Environmental Review
EA Worksheet

Section IV: Findings

- Discuss overall adverse and positive effects
- Include temporary impacts here
- List any mitigation measures

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Step Six
Complete the Environmental Review
EA Worksheet

Section VI: Conclusion

- Most likely – Finding of No Significant Impact (FONSI)
- Document **must be** signed and dated by:
 - Grant administrator
 - CDBG recipient / RE

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Odds and Ends

- Exempt from SHPO Review, Project Determination Form
 - Reason Project Activity is Exempt from SHPO Review

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Odds and Ends (cont.)

- Floodplain Issues
 - If a project lies in the 100 yr. floodplain, after 8 step process is completed and the RE decides to conduct activity, Notice of Decision Regarding language needs to be included in the NOIRROF publication. (p. 87, A II)

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Odds and Ends (cont.)

- Floodplain Issues (cont.)
 - If a project lies in the 100 yr. floodplain, after 8 step process is completed and the RE decides to conduct activity, Notice of Decision Regarding language needs to be included in the NOIRROF publication. (p. 87, A II)

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Odds and Ends (cont.)

- Endangered Species
 - If project does not affect undisturbed areas with native plants and species Fish and Wildlife do not need to be contacted.

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Step Seven Distribute Notices

Publish the concurrent notice:

- Finding of No Significant Impact and Notice to the Public of Intent to Request Release of Funds

Mail concurrent notice to interested parties:

- Fish and Wildlife Services
- DNR: Water & Sewer projects only
- EPA: read footnote

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Step Eight

Submit Request for Release of Funds (RROF)

Form:

- **Recipient name** = City or County
- **Contact name** = grant administrator
- **Part 1:** describe project
- **Part 2:**
 - Section 106 compliance information
 - Dates of Publication
 - Grant Recipient to sign RROF

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Step Eight

Submit Request for Release of Funds (RROF)

- Send to Benton Quade:
 - original, signed RROF and Certification
 - Copy of publication
 - SHPO documentation
 - Level of Determination Form
 - Statutory Checklist

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Step Nine

Funds Released by IDED

- After 15 days state comment period
- Release of funds letter sent
- Project can now begin: sign construction contracts, demolish buildings, start construction, etc.
- You will receive a Release of Funds

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Publishing the Concurrent Notice

Monday	Tuesday	Wednesday	Thursday	Friday	Sat/Sun
April 20 Day of Publication	May 1 Day 1 of Local Comment				
7	8	9	10	11	
14	Day 15 of Local Comment	Send RROF to IDED	Day 1 of State Comment DED Reviews RROF	11	
21	22	23	24	25	
28	29	30	Day 15 of State Comment	Release of Funds Date	

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Regulatory Overview

Executive Order 11988-Floodplain Management, May 24, 1974

- Agency Instruction 1940-G
- Departmental Regulation 9500-3, Land Use Policy
- Agency Instruction 1794
- Agency Instruction 426.1

Executive Order 11988

“...to avoid to the extent possible the long and short term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct or indirect support of floodplain development wherever there is a practicable alternative...”

Three “Goals” of the Order

Minimize the loss of property due to flooding

Minimize the loss of life due to flooding

Restore/preserve the natural values and functions of floodplains

Identification Assistance

- > U.S. Fish & Wildlife Service (USFWS)
- > Natural Resource Conservation Service (NRCS)
 - > Soil Survey Maps
- > U.S. Geologic Survey (USGS)
- > U.S. Army Corps of Engineers (USCOE)
- > State/Local Government
- > Engineering Firm
- > IDNR – Bill.Cappuccio@dnr.state.us

500-year Floodplain

- > 0.2% Chance of flooding
- > Critical Actions
 - ✓ An action which, if located or carried out within a floodplain, poses a greater than normal risk for flood-caused loss of life or property
 - ✓ Includes, but not limited to, those actions which create or extend the useful life of the following facilities
 - ✓ Schools, hospitals, nursing homes, fire and police stations
 - ✓ Data storage centers
 - ✓ Facilities which produce, use, or store highly volatile, flammable, explosive, toxic or water reactive material
 - ✓ Water/wastewater systems, roads that provide only egress from flood prone areas

Flood Insurance

- > An applicant proposing to build in the floodplain is not eligible for RD financial assistance unless the proposed project area is participating in the National Flood Insurance Program.
- > Flood insurance should be a financial mitigation measure only after RD determines that there is no practicable alternative for avoiding construction in the floodplain

Floodplains

RD Instruction 1940-G "Land Use"

- > ...it is RD's policy not to approve or fund any proposals that, as a result of their identifiable impacts, direct or indirect, would lead to or accommodate either the conversion of these land uses or encroachment upon them.
- > The only exceptions are:
 - > There is no practicable alternative
 - > The proposal conforms to planning criteria
 - > The proposal includes all practicable measure for reducing adverse impacts

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FLOODPLAINS

>Evaluation

>8 Steps of Evaluation Process

1. Determine if proposal is in the floodplain
2. Provide for public review and comment
3. Identify and evaluate alternatives to locating in floodplain
4. Identify the impacts of the proposed action
5. Identify methods to minimize potential adverse impacts
6. Reevaluate the proposed action
7. Make a decision and inform the public as required
8. Implement the action

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1. Determine if proposal is in the floodplain

- > 100-year or 500-year for a critical action.
- > If necessary, have an qualified engineer make the determination.

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2. Provide for public review and comment

- Publish notice in newspaper
- Notify the public of intent to locate the project in the floodplain

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3. Identify and evaluate alternatives to locating in floodplain

- Consider alternate sites or actions that meet project objective
- Consider no action
- If a practicable site exists outside the floodplain, the proposed action must not be located in the floodplain

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4. Identify the impacts of the proposed action

Identify both direct and indirect impacts

Impacts could be positive, negative, concentrated, dispersed, or short and long term

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DETERMINE IMPACTS TO THE FOLLOWING:

- ✓Lives and property
- ✓Natural and beneficial floodplain values
- ✓Water resources
- ✓Water quality
- ✓Ground water recharge
- ✓Fish, wildlife and plant resources
- ✓Cultural resource values (open space, natural beauty, and recreation)
- ✓Agriculture, aquaculture , and forestry
- ✓Consideration needs to be given to runoff, sediment deposition, and siltation

5. Identify methods to minimize potential adverse impacts

- Minimize threats to life and property and to natural and beneficial floodplain values

6. Reevaluate the proposed action

- Consider identified impacts and steps to minimize the impacts
- Consider opportunities to restore and preserve floodplain values

7. Make a decision and inform the public as required

- include the reason for locating the project in a floodplain
- the alternatives considered
- any mitigation measures

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8. Implement the action

- Only after completion of steps 1 - 7 and all other requirements are met.

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Public Comment Periods for Notices

Type	Period
Preliminary notice	30 days
Final Notice	15 days
FONSI	15 days
Private party notification	None

Wetlands

Sec. 363 Consolidated Farm And Rural Development Act
SEC. 363. 7 U.S.C. 2006e - Prohibition On Use Of Loans For
Certain Purposes.

The Secretary shall not approve any loan under this title to drain, dredge, fill, level, or otherwise manipulate a wetland (as defined in section 1201(a)(16) of the Food Security Act of 1985 (16 U.S.C. 3801(a)(16))), or to engage in any activity that results in impairing or reducing the flow, circulation, or reach of water, except in the case of activity related to the maintenance of previously converted wetlands, or in the case of such activity that is already commenced before November 28, 1990.

Wetlands

- > Consolidated Farm & Rural Development Act (CONACT) (Amended 1996)
- > Section 751. Prohibition on the use of loans for certain purposes.
- > This Section shall not apply to a loan made or guaranteed under this title for a utility line.
- > This does not however include treatment plants and related structures for utility projects.

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State Revolving Fund Process

Presented by Jean Krewson



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Starting the SRF ER Process

- If you choose to use the SRF ER Services, send in the Environmental Review Checklist at the same time you send in the IUP application and the engineering report (either PER or FP).

Exhibit 4
Iowa Department of Natural Resources
Water Quality Assessment Section
SRF Environmental Review Services Checklist

The following checklist provided for the Owner and Consultant in order to provide the appropriate information to allow the SRF Environmental Review Services (ERS). Some permits are submitted to the SRF ERS Coordinator:

- A listing of the other permit(s) received or being applied for under the same permit application.
- An accurate map of the site with detailed topography, if not available, with a link to the map on the internet which shows area that will include the final location.



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Getting an SRF ER Specialist




- A specialist will be assigned the project and will obtain clearances on your behalf.
- Please work closely with the specialist; they will work to make this process as painless as possible.



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Categorical Exclusions

- If the ER Specialist determines that the project qualifies for a CX, they will notify you of this.
- For a CX, no public hearing is needed, but a text will need to be published in the newspaper.



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Obtaining Clearances

- Clearances that must be obtained for a FNSI:
 - USACE
 - USFWS
 - IDNR Conservation & Recreation
 - IDNR Floodplain
 - SHPO
 - NRCS (if converting farmland)




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Other Consultation





- While they must be notified, these groups need not comment:
 - Tribes (list of ~30)
 - Certified Local Government



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Required Permits

- Permits that may be required:
 - USACE (stream crossings, wetland impacts)
 - IDNR Floodplain (stream crossings, building in floodplain)
 - Local Floodplain
 - Water Use (if installing a new well/intake)



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NPDES Permit Application

- NPDES must be applied for—if discharge is new, or will substantially change in content or location



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SRF Public Hearing



- For a FNSI, a public hearing must be held over the expected environmental impacts of the project.
- If using the IDNR ER services, notify the specialist of the date.

*Photo courtesy of USDA NRCS



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SRF ER Process

- Public Hearing Details
 - Example text of the public notice can be provided
 - Public notice must be published at least **30-days** in advance of the hearing
 - An Environmental Information Document (EID) would be provided to you from IDNR ER specialist for use in the hearing



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SRF ER Process



- After the public hearing we need:
 - Proof of publication of the public notice
 - Public hearing minutes
 - A copy of the EID signed by the applicant (Mayor) that that the EID it is correct to the best of their knowledge



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SRF ER Process

- Once all the proper clearances, permits, and public hearing documentation are gathered, the FNSI can be issued by the IDNR
 - It is sent to various governmental and environmental groups for comment
 - If no relevant objections are received in 30-days the ER is done.





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For More Information

iowasrf.com
Patti Cale-Finnegan
patti.cale-finnegan@dnr.iowa.gov
515-725-0498

iowafinanceauthority.gov
Lori Beary
lori.beary@iowa.gov
515-725-4965



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A Final Reminder

- **The purpose of the Environmental Review is to:**
 - Conserve important natural and historical resources
 - Avoid or mitigate negative impacts
 - Ensure a legacy for future generations

NOT to delay or add expense to your project

Questions?

- “Raise your hand” and wait for us to call on you
- Type your question into the chat box

Thank you!!!
