

# Memorandum

## CDBG Policy Guidance

Date: December 6, 2010  
Policy 10-6

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[www.sccommerce.com](http://www.sccommerce.com)

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Subject: Environmental Reviews involving Tiering or Re-evaluation of the ERR  
Resources: Implementation Manual, Chapter 2, Environmental Review

### Tiering

The concept of tiering or conducting environmental reviews for unspecified sites allows for reviews of broad environmental impacts at an early stage and a review of site specific impacts when the site is identified. At the early stage or Tier One, an environmental review of known conditions is conducted and a strategy for reviewing the unknown conditions is developed. GA is required to review the ERR prior to issuance of the Notice of Removal of Grant Conditions.

A Site Specific Review Checklist is completed once specific project sites become known and prior to committing or expending funds. The strategies/mitigation measures identified in the Tier One review will be used to evaluate the individual sites. The checklist should cover all compliance areas that were not resolved as part of the area-wide Tier One review. **This Tier Two checklist is documented in the ERR and does not require submission to GA.**

### Re-evaluation of ERR Findings

If the size or scope of the CDBG project changes significantly or if the location changes, the recipient must reassess the project's environmental impact and update the ERR. The purpose of the reevaluation is to determine if the original environmental finding is still valid. **Generally, the original ERR is considered valid for five years unless conditions have changed.**

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**This policy memorandum updates the 2010 Community Development Block Grant Program and becomes effective immediately unless otherwise stated. The program documents located on the SC Department of Commerce website has the most up to date policies of the CDBG program.**

<http://www.sccommerce.com/cdbgformsanddocuments/cdbgformsanddocuments.aspx>

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