

What is Tiering?

- A method for evaluating projects at early stages when the particular sites are not yet known,
- A method for streamlining the environmental review for similar activities that are grouped into projects,

Tiering, or Unspecified Site Strategy as it is sometimes called, should be used for projects when sites have not been identified. The Tiered review allows the Responsible Entity (RE) to review broad environmental impacts at the early stage of a project and site-specific impacts when the sites are identified. It also allows the RE to obtain a release of funds, for a particular project and timeframe prior to identification of the individual sites (24 CFR Part 58.15).

A project is a group of related activities (24 CFR Part 58.2 (a)(1 and 4)). Grouping activities together into projects is called aggregation; projects can be functionally (all single family actions) or geographically related such as a historic district (24 CFR Part 58.32). A project is not a Program or a group of Programs such as CDBG or HOME.

The Tiered review must contain: (1) An environmental form at the appropriate level of review (2) Written Strategy (3) A Site Specific Review Checklist (4) Request for Release of Funds: Public Notice and Authority to Use Grant Funds

The environmental form must document compliance with environmental factors that are not triggered in the area of the project. Items that are not in compliance must be on the written strategy. The strategy must explain how the remaining compliance factors will be addressed as the sites are identified. The site-specific review checklist must be filled out for each site and must contain all items that were not documented to be in compliance at the broad level of review.

To begin the environmental review for a project where the sites are not yet known, the level of review must be determined, and the environmental review on the appropriate HUD form must be conducted. Each of the compliance factors on the HUD form should be evaluated. The compliance factors that can be documented not to occur in the project area should be eliminated when developing the site-specific strategy and checklist. For example, since Coastal Zones do not occur in Macon, Georgia; Macon, Georgia can eliminate Coastal Zones from the Strategy and Site-Specific Checklist.

The Site-Specific Checklist should only include the items that cannot be eliminated because conditions are not known until the actual sites are identified. Generally that includes Noise, Historic Preservation, Flood Plain and Hazards. Conditions in your community will determine what Laws and Authorities must be addressed in the Site-Specific phase of the environmental process.

As individual sites are identified, the sites must be screened on the Site-Specific Checklists. The documentation for each compliance factor on the Site-Specific Checklists should be attached to each site review and funds should not be committed prior to the completion of the site-specific review. Each form must be signed and dated and the dates will be compared with the project file to determine if funds have been committed prior to the date on the Site Specific Review form.

There should be a separate Unspecified Site-Strategy for each aggregated project and the sites should be evaluated individually as they are identified across the years the project is funded. A five-year strategy can be developed that is consistent with the Consolidated Plan. Single-family housing is an appropriate use of Tiering; combining all activities funded by the City into one project is not an appropriate use of Tiering because the activities are not related and should not be grouped into a project.

What Tiering Is Not

- Tiering is not a way to avoid public notice – The National Environmental Policy Act requires that the public be notified when there is a potential for environmental impact. Under 24 CFR part 58, public notice is required for a Categorically Excluded projects that triggers compliance with the Laws and Authorities at 24 CFR Part 58.5 or any time a full assessment is required.
- Tiering is not a way to avoid conducting the environmental review – The environmental impact of each project must be determined through interdisciplinary study and analysis using qualified data sources.