

EXHIBIT 18

EXEMPT ACTIVITIES

Exempt Activities, as defined in 24 CFR §58.34, are exempt from NEPA (National Environmental Policy Act) environmental review (except as listed below in 24 CFR §58.6) and other laws and authorities listed in 24 CFR §58.35. Following are the ONLY activities and projects that may be undertaken without first completing an environmental review, pursuant to 24 CFR §58.34(a), Exempt Activities and Projects:

- ▶ §58.34(a)(1): Environmental and other studies
- ▶ §58.34(a)(1): Resources identification
- ▶ §58.34(a)(1): Plan and strategy development
- ▶ §58.34(a)(2): Information and financial services
- ▶ §58.34(a)(3): Administrative (**not a HOME-eligible activity**) and management activities
- ▶ §58.34(a)(4): Public services with no physical impacts (**not a HOME-eligible activity**)
- ▶ §58.34(a)(5): Property inspections for hazards and defects
- ▶ §58.34(a)(6): Purchase of insurance
- ▶ §58.34(a)(7): Purchase of tools
- ▶ §58.34(a)(8): Engineering and design costs
- ▶ §58.34(a)(9): Technical assistance and training
- ▶ §58.34(a)(10): Assistance for temporary or permanent improvements that do not alter environmental conditions and are limited to restoration activities necessary only to control or arrest the effects from disasters or imminent threats to public safety, including physical deterioration (**not a HOME-eligible activity**)
- ▶ §58.34(a)(11): Payment of principal and interest on loans made or guaranteed by HUD (**not a HOME-eligible activity**)
- ▶ §58.34(a)(12): Any §58.35(a) categorically excluded activity or project which have no environmental impacts pursuant to 24 CFR §58.5

Applicants must document the 24 CFR §58.34 exempt actions but do not need to submit a Request for Release of Funds and Certification to the HOME Program. Applicants must contact the HOME Program for instructions for documenting the 24 CFR §58.34 exemption.

However, these activities are not exempt from the requirements found at 24 CFR §58.6:

- Flood Disaster Protection Act of 1973, which requires avoiding siting projects in Special Flood Hazard Areas (SFHA) unless National Flood Insurance Program flood

insurance is obtained (an exception can be made when a formula grant, e.g., HOME grant, is made to a state)

- National Flood Insurance Reform Act of 1994, which requires disaster assistance in SFHAs not be used for certain instances
- 24 CFR part 51, Subpart D, which requires notifying buyers when properties are within runway clear zones and obtaining a written receipt of such notification.