

**Environmental Review Process
USDA, Rural Development
Business & Cooperative Programs - Arizona**

I. Discuss the Project with USDA, Rural Development

Whenever a project funded with a USDA, Rural Development (Agency) Guaranteed Business and Industry (B&I) Loan, with a Rural Energy for America (REAP) Guaranteed Loan, with a REAP Grant, or with a Rural Business Development Grant (RBDG) anticipates or proposes ground disturbing activities, an environmental review must be completed that meets Agency regulations (7 CFR Part 1970) and requirements of the National Environmental Policy Act (NEPA).

It is important to contact the Agency representative working with you on your project at the very beginning of your due diligence process to discuss the Agency environmental review process and requirements. Most ground disturbing projects will be classified as a Categorical Exclusion with an Environmental Report. For more information about NEPA Categorical Exclusions see <https://www.rd.usda.gov/files/1970b.pdf>.

When you contact the Agency, be prepared to discuss the overall project, the size of the project site in acres, how the project will impact the site (roads, utilities, rights of way, etc.), provide a map with the project address or major cross streets (if not addressed) with the proposed site improvements drawn in on the map, discuss any potential adverse or controversial effects on the environment, permitting required, etc.

Once we have had this discussion, the Agency will advise you on the type of NEPA compliant review that will be required.

All loans and/or grants over \$100,000.00 secured by real estate will require a Phase I Environmental Site Assessment (ESA) and all projects secured by real estate will require the Standard Flood Hazard Determination Form (SFHDF).

It is our intention that after discussion, the Environmental Professional that you hire to complete the Phase I ESA will also be able to complete the Agency required Environmental Report *except* the Historic Preservation section of the Environmental Report. The Agency will complete that section of the Environmental Report in keeping with the Government-to-Government consultation protocols with State agencies and Native American Tribes.

II. Contacting the Arizona State Museum

The first step in this process is to contact the Arizona State Museum (ASM), Cultural Resources Management Services and request a “Cultural Resources Summary Letter”. The following link will provide a form that must be completed:

<https://statemuseum.arizona.edu/crm/document/cultural-resources-summary-letter-non-archaeologists>

Submit the form in accordance with the guidance and instructions on the form. Once submitted, you will receive a quote for their services and instructions on how to remit the quoted fees.

Ms. Shannon Twilling is the contact at the ASM:



Once you receive the “Cultural Resources Summary Letter” (usually be e-mail) submit a copy to our office via e-mail. It is important we receive the letter as soon as possible so we can begin the required Historic Preservation consultation process with Arizona State Historic Preservation Office (SHPO) and the Native American tribes claiming cultural affinity to the project area.

The ASM, the SHPO, and/or a Native American Tribe may require a cultural resource survey at your expense.

If you have any questions, please do not hesitate to contact our office.