

Iowa SRF Environmental Review

lowa SRF completes the environmental review (ER) for lowa SRF projects to ensure the project meets state and federal requirements. If you are applying for other federal funding sources, we can provide our environmental review documents to assist with the application. Iowa DNR engineers will review the Intended Use Plan (IUP) application within 45 days of the quarterly due date and provide approval for the project to be added to the draft project priorities list (PPL). We will begin the environmental review after the project is deemed eligible to be on the IUP. In order to begin an environmental review, both the scope and location must be determined. SRF projects are scored as either a Categorical Exclusion (CX) or a Finding of No Significant Impact (FNSI). CX are used for small replacement and rehabilitation projects as outlined in 40 CFR 6.204. If a project scope exceeds the limitations of the definition of CX, then they will be reviewed as a FNSI per 40 CFR 6.206. After scoring is complete, the assigned environmental review staff will reach out to initiate the environmental review.

lowa SRF environmental review must be NEPA-like according to 40 CFR 35. Additionally, cross-cutting federal authorities apply to SRF projects and activities. Cross-cutting federal authorities are the requirements of other federal laws and Executive Orders that apply in federal financial assistance programs. For SRF, some of these cross-cutters may include:

- Endangered Species Act clearance through US Fish and Wildlife (USFWS)
- National Historic Preservation Act clearance through State Historic Preservation Office (SHPO)
- Wetlands clearance through Army Corps of Engineers (USACE)
- Flood plains clearance through State and Local permitting authorities
- Sovereign Lands clearance through DNR Conservation and Recreation
- Farmland Protection Act clearance through National Resource Conservation Service (NRCS)
- Tribe Consultation currently 29 tribes are notified of Iowa SRF projects

If an archaeological investigation is needed for compliance with the National Historic Preservation Act, SRF can contract with the Office of the State Archaeologist (OSA) to complete the field work with costs covered by SRF overhead. But, if further investigation is required or the project location changes, the applicant will need to pay for additional archaeology and this cost is reimbursable through your SRF loan.

Because many of our environmental review steps include consultation with other agencies, our timeline is dependent on their turnaround times.

An estimated timeline for an average FNSI level review is 9-12 months, depending on the site and project details. The applicant will need to hold a public hearing for FNSI environmental reviews and provide sufficient public notice 30 days in advance of the hearing. The assigned ER staff will provide instructions and detailed requirements once the environmental review is proceeding sufficiently.

An estimated timeline for an average CX level review is 3-6 months, depending on the site and project details. When the CX is issued, the applicant will need to provide sufficient public notice to trigger the final 30 day comment period. The assigned ER staff will provide the language and options for the public notices at that time.

No ground disturbance or construction/demolition activities can begin on an SRF project until the environmental review has been finalized, construction permit issued, and all applicable approvals obtained.

Additional resources can be found at our website iowasrf.com/environmental-review