Environmental Assessment
Determinations and Compliance Findings
for HUD-assisted Projects
24 CFR Part 58

Project Information

Project Name: Timbers-Preservation-Project-Phase-I
HEROS Number: 900000010245740

Responsible Entity (RE): WICHITA, CITY HALL WICHITA KS, 67202
RE Preparer: Brad Snapp

State / Local Identifier: Wichita Kansas
Certifying Officer: Robert Layton / City Manager

Grant Recipient (if different than Responsible Entity):

Point of Contact:

Consultant (if applicable):

Point of Contact:

Project Location: 2021 N Old Manor Rd, Wichita, KS 67208

Additional Location Information: N/A

Direct Comments to:
Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:
The proposed development will be the first phase in the revitalization of the existing Timbers campus at 2021 North Old Manor Road. The existing buildings on the campus were constructed in 1979 and after a needs assessment was performed it was determined that demolishing and replacing the existing apartment buildings would be a more cost-effective approach. This conclusion was reached after taking into account the deteriorating condition of the buildings along with the difficulty in modifying them to meet current handicap accessibility and energy efficiency requirements. This phase of the proposed development will involve demolishing and replacing three six-plexes and will be comprised of eighteen one-bedroom units, each approx. 790 sf in size. Since the development will involve replacing housing on an existing campus for existing tenants, the new apartments will relate perfectly to their surroundings.

Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:
The proposed development will be the first phase in the revitalization of the existing Timbers campus at 2021 North Old Manor Road. The existing buildings on the campus were constructed in 1979 and after a needs assessment was performed it was determined that demolishing and replacing the existing apartment buildings would be a more cost-effective approach. This conclusion was reached after taking into account the deteriorating condition of the buildings along with the difficulty in modifying them to meet current handicap accessibility and energy efficiency requirements. This phase of the proposed development will involve demolishing and replacing three six-plexes and will be comprised of eighteen one-bedroom units, each approximately 790 square feet in size. Since the development will involve replacing housing on an existing campus for existing tenants, the new apartments will relate perfectly to their surroundings. The project addresses local community development by providing quality, affordable housing for low-income persons with developmental, mental, and physical disabilities. Much of the available lower-income housing in the community is substandard, unaffordable, and does not meet the handicap accessibility needs of this target demographic. The proposed development addresses the priorities and strategies laid out in the 2019-2023 City of Wichita Consolidated Plan by providing housing for low-income disabled residents who are at the greatest need and thereby preventing potential homelessness in the community. Specifically, the proposed development addresses Priority Need #1 - Safe Affordable Housing which is listed as a High Priority Level in Table 48 - Priority Needs Summary. Per Priority Need #1, the proposed new housing development will serve the following qualifying populations: extremely low income, low income, persons with physical disabilities, and persons with developmental disabilities.

Existing Conditions and Trends [24 CFR 58.40(a)]:
The Cerebral Palsy Research Foundation built the Timbers apartment complex for persons with disabilities in 1979. All of the current units are handicap accessible, but need updating to to meet current accessibility requirements.
Maps, photographs, and other documentation of project location and description:

Determination:

| ✓ | Finding of No Significant Impact [24 CFR 58.40(g)(1); 40 CFR 1508.13] The project will not result in a significant impact on the quality of human environment |
| | Finding of Significant Impact |

Approval Documents:

7015.15 certified by Certifying Officer on:

7015.16 certified by Authorizing Officer on:

Funding Information

<table>
<thead>
<tr>
<th>Grant / Project Identification Number</th>
<th>HUD Program</th>
<th>Program Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>M-21-MC-20-0204</td>
<td>Community Planning and Development (CPD)</td>
<td>HOME Program</td>
</tr>
</tbody>
</table>

Estimated Total HUD Funded, Assisted or Insured Amount: $190,000.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: $4,182,000.00

Compliance with 24 CFR §50.4, §58.5 and §58.6 Laws and Authorities

<table>
<thead>
<tr>
<th>Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6</th>
<th>Are formal compliance steps or mitigation required?</th>
<th>Compliance determination (See Appendix A for source determinations)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Airport Hazards Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D</td>
<td>☐ Yes ☑ No</td>
<td>The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in</td>
</tr>
<tr>
<td>Statute/Act</td>
<td>Yes/No</td>
<td>Description</td>
</tr>
<tr>
<td>-------------------------------------------------------------------------------------------------</td>
<td>--------</td>
<td>-------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td><strong>Coastal Barrier Resources Act</strong></td>
<td>☐ Yes  ☑ No</td>
<td>This project is located in a state that does not contain CBRS units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.</td>
</tr>
<tr>
<td>Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Flood Insurance</strong></td>
<td>☐ Yes  ☑ No</td>
<td>The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with flood insurance requirements.</td>
</tr>
<tr>
<td><strong>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 &amp; § 58.5</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Air Quality</strong></td>
<td>☐ Yes  ☑ No</td>
<td>The project’s county or air quality management district is in attainment status for all criteria pollutants. The project is in compliance with the Clean Air Act.</td>
</tr>
<tr>
<td>Clean Air Act, as amended, particularly section 176(c) &amp; (d); 40 CFR Parts 6, 51, 93</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Coastal Zone Management Act</strong></td>
<td>☐ Yes  ☑ No</td>
<td>This project is located in a state that does not participate in the Coastal Zone Management Program. Therefore, this project is in compliance with the Coastal Zone Management Act.</td>
</tr>
<tr>
<td>Coastal Zone Management Act, sections 307(c) &amp; (d)</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Contamination and Toxic Substances</strong></td>
<td>☐ Yes  ☑ No</td>
<td>Site contamination was evaluated as follows: None of the above. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. The project is in compliance with contamination and toxic substances requirements.</td>
</tr>
<tr>
<td>24 CFR 50.3(i) &amp; 58.5(i)(2)</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Endangered Species Act</strong></td>
<td>☐ Yes  ☑ No</td>
<td>This project will have No Effect on listed species because there are no listed species or designated critical habitats in the action area. This project is in compliance with the Endangered Species Act.</td>
</tr>
<tr>
<td>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Section</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>------------------------------------------------------------------------</td>
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<td>----</td>
</tr>
<tr>
<td><strong>Explosive and Flammable Hazards</strong></td>
<td>☐</td>
<td>☑</td>
</tr>
<tr>
<td><strong>Farmlands Protection</strong></td>
<td>☐</td>
<td>☑</td>
</tr>
<tr>
<td><strong>Floodplain Management</strong></td>
<td>☐</td>
<td>☑</td>
</tr>
<tr>
<td><strong>Historic Preservation</strong></td>
<td>☐</td>
<td>☑</td>
</tr>
<tr>
<td><strong>Noise Abatement and Control</strong></td>
<td>☐</td>
<td>☑</td>
</tr>
</tbody>
</table>
showing 65dB as the highest sound contour outside of the Base property. Roadways and railroads were outside the distance thresholds.

<table>
<thead>
<tr>
<th>Sole Source Aquifers</th>
<th>□ Yes ☒ No</th>
<th>The project is not located on a sole source aquifer area. The project is in compliance with Sole Source Aquifer requirements.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Wetlands Protection</td>
<td>□ Yes ☒ No</td>
<td>The project will not impact on- or off-site wetlands. The project is in compliance with Executive Order 11990.</td>
</tr>
<tr>
<td>Executive Order 11990, particularly sections 2 and 5</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Wild and Scenic Rivers Act</td>
<td>□ Yes ☒ No</td>
<td>This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act.</td>
</tr>
<tr>
<td>Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**HUD HOUSING ENVIRONMENTAL STANDARDS**

**ENVIRONMENTAL JUSTICE**

<table>
<thead>
<tr>
<th>Environmental Justice</th>
<th>□ Yes ☒ No</th>
<th>No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898. This proposed project involves the reconstruction of three multifamily buildings with six one-bedroom apartments in each one. Demolition and reconstruction will allow complete compliance with ADA regulations.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Executive Order 12898</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27]**

**Impact Codes**: An impact code from the following list has been used to make the determination of impact for each factor.

1. Minor beneficial impact
2. No impact anticipated
3. Minor Adverse Impact – May require mitigation
4. Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement.
<table>
<thead>
<tr>
<th>Environmental Assessment Factor</th>
<th>Impact Code</th>
<th>Impact Evaluation</th>
<th>Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td>LAND DEVELOPMENT</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design</td>
<td>1</td>
<td>The Timbers is sustaining the existing residential housing for persons with disabilities in this proposed project. The multifamily buildings need significant improvement, and reconstruction is the best answer. The property is zoned appropriately as B, Multifamily Residential. The reconstructed buildings will be the same size as the originals.</td>
<td>No mitigation is necessary.</td>
</tr>
<tr>
<td>Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff</td>
<td>2</td>
<td>According to the USGS Soil Mapper, the proposed project site has Farnum Loam with 1 to 3 percent slopes. Developers shall plant grass to prevent erosion and grade the finished site for proper drainage and stormwater runoff. The site has existing paved parking areas that drain into stormwater sewers.</td>
<td>No mitigation is necessary.</td>
</tr>
<tr>
<td>Hazards and Nuisances including Site Safety and Site-Generated Noise</td>
<td>2</td>
<td>The proposed site does not contain any hazards or nuisances or site-generated noise.</td>
<td>No mitigation is necessary.</td>
</tr>
<tr>
<td>Energy Consumption/Energy Efficiency</td>
<td>1</td>
<td>Reconstruction of the three multifamily buildings will allow for increased energy efficient building materials and appliances.</td>
<td>No mitigation is necessary.</td>
</tr>
<tr>
<td>SOCIOECONOMIC</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Employment and Income Patterns</td>
<td>2</td>
<td>The Timbers is slightly south of 21st Street, which is a major arterial in Wichita. The site is between Hillside and Oliver and a mile west of Woodlawn Blvd. All intersections contain commercial businesses. The Cerebral Palsy Research Foundation has work sites where residents can work and earn money.</td>
<td>No mitigation is necessary.</td>
</tr>
<tr>
<td>Demographic Character Changes / Displacement</td>
<td>2</td>
<td>The proposed project will not cause a demographic change in the area nor will it cause displacement.</td>
<td>No mitigation is necessary.</td>
</tr>
</tbody>
</table>

COMMUNITY FACILITIES AND SERVICES
<table>
<thead>
<tr>
<th>Environmental Assessment Factor</th>
<th>Impact Code</th>
<th>Impact Evaluation</th>
<th>Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td>LAND DEVELOPMENT</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Educational and Cultural Facilities (Access and Capacity)</td>
<td>2</td>
<td>The proposed Timbers Preservation Project Phase I is served by USD 259 schools. Brooks Elementary Magnet school is approximately 1.25 miles from the project site. Stuck Middle School is nearly three miles away and Heights High School is 4.25 miles away. The Maya Angelou Public Library is almost a mile and a half west of the proposed project.</td>
<td></td>
</tr>
<tr>
<td>Commercial Facilities (Access and Proximity)</td>
<td>2</td>
<td>21st Street and Oliver is the nearest intersection to the proposed project site. Kwik Shop convenience store and gas pumps is located on the NE corner. Wichita State University's Innovation Campus is located on the SW corner of the intersection. It is a mixture of retail and commercial industries. Aldi Groceries is located slightly over one mile east of the Timbers. Wichita Transit Route 21 travels past the store. The Northeast YMCA is located approximately three miles northeast of the Timbers.</td>
<td></td>
</tr>
<tr>
<td>Health Care / Social Services (Access and Capacity)</td>
<td>2</td>
<td>HealthCore Clinic is located on 21st Street east of Grove Avenue. GraceMed has several locations near the proposed project and Wesley Medical Center is located at Central and Hillside.</td>
<td></td>
</tr>
<tr>
<td>Solid Waste Disposal and Recycling (Feasibility and Capacity)</td>
<td>2</td>
<td>Solid waste disposal and recycling is provided to residential and commercial customers by independent companies. Companies have sufficient capacity to take on more clients. The Timbers has active solid waste and recycling removal.</td>
<td></td>
</tr>
<tr>
<td>Waste Water and Sanitary Sewers (Feasibility and Capacity)</td>
<td>2</td>
<td>The Timbers is connected to the Wichita sanitary sewer system.</td>
<td>No mitigation is necessary.</td>
</tr>
<tr>
<td>Environmental Assessment Factor</td>
<td>Impact Code</td>
<td>Impact Evaluation</td>
<td>Mitigation</td>
</tr>
<tr>
<td>--------------------------------</td>
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</tr>
<tr>
<td><strong>LAND DEVELOPMENT</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Water Supply (Feasibility and Capacity)</td>
<td>2</td>
<td>The Timbers is connected to the Wichita water supply and will continue to use public water after reconstruction has been completed.</td>
<td>No mitigation is necessary.</td>
</tr>
<tr>
<td>Public Safety - Police, Fire and Emergency Medical</td>
<td>2</td>
<td>Wichita Police Department operates Patrol North from the substation located at 3015 E 21st Street. Wichita Fire Station No. 10 is located across 21st Street from Patrol North. Both facilities are within a mile and a half from the proposed project. Sedgwick County Emergency Medical Service Post No. 12 is located at 3320 N Hillside adjacent to K-96 and within minutes of the Timbers.</td>
<td></td>
</tr>
<tr>
<td>Parks, Open Space and Recreation (Access and Capacity)</td>
<td>2</td>
<td>Redbud Park has a children's playground and soccer field. It is 612 feet east of the Timbers site.</td>
<td></td>
</tr>
<tr>
<td>Transportation and Accessibility (Access and Capacity)</td>
<td>2</td>
<td>Wichita Transit will go to the Timbers and load wheelchair bound residents into their para-transit buses. A map of the Wichita Transit Route number 21 is attached.</td>
<td>No mitigation is necessary.</td>
</tr>
<tr>
<td><strong>NATURAL FEATURES</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Unique Natural Features /Water Resources</td>
<td>2</td>
<td>There are no unique natural features or water resources on the Timbers site.</td>
<td>No mitigation is necessary.</td>
</tr>
<tr>
<td>Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)</td>
<td>2</td>
<td>There is no unique vegetation or wildlife on the proposed Timbers site. This is an urban institutional residential setting.</td>
<td>No mitigation is necessary.</td>
</tr>
<tr>
<td>Other Factors</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Supporting documentation**

- Conformance with Plans_2035 Wichita Future Growth Map.pdf
- Commercial Facilities.pdf
- The Timbers Preservation Phase I Site Inspection Record.pdf
- ICT GIS Property Report.pdf
- Wetlands Mapper 6-3-2022(1).pdf
- Education and Culture Map.pdf
- Hospitals and Medical Clinics Near Timbers Phase I.pdf
Field Inspection [Optional]: Date and completed by: Brad Snapp

List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]:

List of Permits Obtained:

Public Outreach [24 CFR 58.43]:
Responsible Entity staff published the combined FONSI-NOI RROF in the Wichita Eagle on July 15, 2022 and posted the same notice with a link to the Environmental Assessment on the Wichita Housing and Community Services website on July 15. The 15-day review and comment period started on July 16 and ended on August 1, 2022.

Cumulative Impact Analysis [24 CFR 58.32]:
Because the proposed Timbers Preservation Phase I project is a reconstruction of existing buildings and the same number of units there will not be a significant impact on the environment. The project will have a positive impact to the facility as a whole and the persons with disabilities who will live there.
Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]
There are no good alternatives. Reconstructing the buildings is the best plan. Developers and owners will be able to implement advanced ADA equipment more economically by demolishing and reconstructing than by retrofitting devices to an existing structure.

No Action Alternative [24 CFR 58.40(e)]
The alternative is not good. Letting the existing buildings continue to deteriorate would have a negative impact on the current residents, the Timbers community and the adjacent neighborhood.

Summary of Findings and Conclusions:
The City of Wichita found that the Timbers Preservation Project Phase I would not have a significant impact on the environment and would be a positive for the community.

Mitigation Measures and Conditions [CFR 1505.2(c)]:
Summarized below are all mitigation measures adopted by the Responsible Entity to reduce, avoid or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

<table>
<thead>
<tr>
<th>Law, Authority, or Factor</th>
<th>Mitigation Measure or Condition</th>
<th>Comments on Completed Measures</th>
<th>Mitigation Plan</th>
<th>Complete</th>
</tr>
</thead>
<tbody>
<tr>
<td>Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design</td>
<td>No mitigation is necessary.</td>
<td>N/A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff</td>
<td>No mitigation is necessary.</td>
<td>N/A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hazards and Nuisances including Site Safety and Site-Generated Noise</td>
<td>No mitigation is necessary.</td>
<td>N/A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Category</td>
<td>Action Required</td>
<td>Code</td>
<td></td>
<td></td>
</tr>
<tr>
<td>----------------------------------------------------</td>
<td>--------------------------</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Energy Consumption/Energy Efficiency</td>
<td>No mitigation is necessary.</td>
<td>N/A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Employment and Income Patterns</td>
<td>No mitigation is necessary.</td>
<td>N/A</td>
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<td>No mitigation is necessary.</td>
<td>N/A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Waste Water and Sanitary Sewers (Feasibility and Capacity)</td>
<td>No mitigation is necessary.</td>
<td>N/A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Water Supply (Feasibility and Capacity)</td>
<td>No mitigation is necessary.</td>
<td>N/A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Transportation and Accessibility (Access and Capacity)</td>
<td>No mitigation is necessary.</td>
<td>N/A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Unique Natural Features /Water Resources</td>
<td>No mitigation is necessary.</td>
<td>N/A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)</td>
<td>No mitigation is necessary.</td>
<td>N/A</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Project Mitigation Plan**

No mitigation plans are necessary for any part of the proposed Timbers Preservation Project - Phase I.

**Supporting documentation on completed measures**
APPENDIX A: Related Federal Laws and Authorities

Airport Hazards

<table>
<thead>
<tr>
<th>General policy</th>
<th>Legislation</th>
<th>Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>It is HUD’s policy to apply standards to prevent incompatible development around civil airports and military airfields.</td>
<td>24 CFR Part 51 Subpart D</td>
<td></td>
</tr>
</tbody>
</table>

1. To ensure compatible land use development, you must determine your site’s proximity to civil and military airports. Is your project within 15,000 feet of a military airport or 2,500 feet of a civilian airport?

✓ No

Based on the response, the review is in compliance with this section. Document and upload the map showing that the site is not within the applicable distances to a military or civilian airport below

Yes

Screen Summary

Compliance Determination
The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements.

Supporting documentation

Airport Hazards Map.pdf

Are formal compliance steps or mitigation required?

Yes

✓ No
Coastal Barrier Resources

<table>
<thead>
<tr>
<th>General requirements</th>
<th>Legislation</th>
<th>Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>HUD financial assistance may not be used for most activities in units of the Coastal Barrier Resources System (CBRS). See 16 USC 3504 for limitations on federal expenditures affecting the CBRS.</td>
<td>Coastal Barrier Resources Act (CBRA) of 1982, as amended by the Coastal Barrier Improvement Act of 1990 (16 USC 3501)</td>
<td></td>
</tr>
</tbody>
</table>

This project is located in a state that does not contain CBRA units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.

Compliance Determination
This project is located in a state that does not contain CBRS units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.

Supporting documentation

Coastal Barrier Resource System USA Map 2022.pdf

Are formal compliance steps or mitigation required?
Yes
✓ No
Flood Insurance

<table>
<thead>
<tr>
<th>General requirements</th>
<th>Legislation</th>
<th>Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Certain types of federal financial assistance may not be used in floodplains unless the community participates in National Flood Insurance Program and flood insurance is both obtained and maintained.</td>
<td>Flood Disaster Protection Act of 1973 as amended (42 USC 4001-4128)</td>
<td>24 CFR 50.4(b)(1) and 24 CFR 58.6(a) and (b); 24 CFR 55.1(b).</td>
</tr>
</tbody>
</table>

1. **Does this project involve financial assistance for construction, rehabilitation, or acquisition of a mobile home, building, or insurable personal property?**

   No. This project does not require flood insurance or is excepted from flood insurance.

   ✓ Yes

2. **Upload a FEMA/FIRM map showing the site here:**

   [FEMA FIRMette 20173C0357G Zone X.pdf](#)

   The Federal Emergency Management Agency (FEMA) designates floodplains. The FEMA Map Service Center provides this information in the form of FEMA Flood Insurance Rate Maps (FIRMs). For projects in areas not mapped by FEMA, use the best available information to determine floodplain information. Include documentation, including a discussion of why this is the best available information for the site. Provide FEMA/FIRM floodplain zone designation, panel number, and date within your documentation.

   **Is the structure, part of the structure, or insurable property located in a FEMA-designated Special Flood Hazard Area?**

   ✓ No

   Based on the response, the review is in compliance with this section.

   Yes

4. **While flood insurance is not mandatory for this project, HUD strongly recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). Will flood insurance be required as a mitigation measure or condition?**
Screen Summary
Compliance Determination
The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with flood insurance requirements.

Supporting documentation
FEMA FIRMette 20173C0357G Zone X(2).pdf

Are formal compliance steps or mitigation required?

Yes
✓ No
Air Quality

General requirements

The Clean Air Act is administered by the U.S. Environmental Protection Agency (EPA), which sets national standards on ambient pollutants. In addition, the Clean Air Act is administered by States, which must develop State Implementation Plans (SIPs) to regulate their state air quality. Projects funded by HUD must demonstrate that they conform to the appropriate SIP.

Legislation

Clean Air Act (42 USC 7401 et seq.) as amended particularly Section 176(c) and (d) (42 USC 7506(c) and (d))

Regulation

40 CFR Parts 6, 51 and 93

1. Does your project include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units?

✓ Yes

No

Air Quality Attainment Status of Project’s County or Air Quality Management District

2. Is your project’s air quality management district or county in non-attainment or maintenance status for any criteria pollutants?

✓ No, project’s county or air quality management district is in attainment status for all criteria pollutants.

Yes, project’s management district or county is in non-attainment or maintenance status for the following criteria pollutants (check all that apply):

Screen Summary

Compliance Determination

The project’s county or air quality management district is in attainment status for all criteria pollutants. The project is in compliance with the Clean Air Act.

Supporting documentation
**EPA Kansas Nonattainment-Maintenance Status for Each County for All Pollutants 2-28-2022.pdf**

Are formal compliance steps or mitigation required?

- Yes
- No

✓ No
Coastal Zone Management Act

<table>
<thead>
<tr>
<th>General requirements</th>
<th>Legislation</th>
<th>Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Federal assistance to applicant agencies for activities affecting any coastal use or resource is granted only when such activities are consistent with federally approved State Coastal Zone Management Act Plans.</td>
<td>Coastal Zone Management Act (16 USC 1451-1464), particularly section 307(c) and (d) (16 USC 1456(c) and (d))</td>
<td>15 CFR Part 930</td>
</tr>
</tbody>
</table>

This project is located in a state that does not participate in the Coastal Zone Management Program. Therefore, this project is in compliance with the Coastal Zone Management Act.

Screen Summary
Compliance Determination
This project is located in a state that does not participate in the Coastal Zone Management Program. Therefore, this project is in compliance with the Coastal Zone Management Act.

Supporting documentation

Coastal Zone Management State Programs.docx

Are formal compliance steps or mitigation required?
Yes

✓ No
Contamination and Toxic Substances

<table>
<thead>
<tr>
<th>General requirements</th>
<th>Legislation</th>
<th>Regulations</th>
</tr>
</thead>
<tbody>
<tr>
<td>It is HUD policy that all properties that are being proposed for use in HUD programs be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of the occupants or conflict with the intended utilization of the property.</td>
<td></td>
<td>24 CFR 58.5(i)(2) 24 CFR 50.3(i)</td>
</tr>
</tbody>
</table>

1. How was site contamination evaluated? Select all that apply. Document and upload documentation and reports and evaluation explanation of site contamination below.

   American Society for Testing and Materials (ASTM) Phase I Environmental Site Assessment (ESA)
   ASTM Phase II ESA
   Remediation or clean-up plan
   ASTM Vapor Encroachment Screening
   ✓ None of the Above

2. Were any on-site or nearby toxic, hazardous, or radioactive substances found that could affect the health and safety of project occupants or conflict with the intended use of the property? (Were any recognized environmental conditions or RECs identified in a Phase I ESA and confirmed in a Phase II ESA?)

   ✓ No

   Explain:
   There are no on-site or nearby toxic, hazardous or radioactive substances found that could affect the health and safety of project occupants or conflict with the intended use of the property. Preparer consulted the Wichita GIS and Kansas Department of Health and Environment property map and environmental report. See attached.

   Based on the response, the review is in compliance with this section.

   Yes

Screen Summary
Compliance Determination
Site contamination was evaluated as follows: None of the above. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. The project is in compliance with contamination and toxic substances requirements.

Supporting documentation

ICT GIS and KDHE Environmental_Report.pdf

Are formal compliance steps or mitigation required?
Yes
✓ No
### Endangered Species

<table>
<thead>
<tr>
<th>General requirements</th>
<th>ESA Legislation</th>
<th>Regulations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Section 7 of the Endangered Species Act (ESA) mandates that federal agencies ensure that actions that they authorize, fund, or carry out shall not jeopardize the continued existence of federally listed plants and animals or result in the adverse modification or destruction of designated critical habitat. Where their actions may affect resources protected by the ESA, agencies must consult with the Fish and Wildlife Service and/or the National Marine Fisheries Service (“FWS” and “NMFS” or “the Services”).</td>
<td>The Endangered Species Act of 1973 (16 U.S.C. 1531 et seq.); particularly section 7 (16 USC 1536).</td>
<td>50 CFR Part 402</td>
</tr>
</tbody>
</table>

1. **Does the project involve any activities that have the potential to affect species or habitats?**

   No, the project will have No Effect due to the nature of the activities involved in the project.

   No, the project will have No Effect based on a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office

   ✓ Yes, the activities involved in the project have the potential to affect species and/or habitats.

2. **Are federally listed species or designated critical habitats present in the action area?**

   ✓ No, the project will have No Effect due to the absence of federally listed species and designated critical habitat

   Based on the response, the review is in compliance with this section. Document and upload all documents used to make your determination below. Documentation may include letters from the Services, species lists from the Services’ websites, surveys or other documents and analysis showing that there are no species in the action area.

   Yes, there are federally listed species or designated critical habitats present in the action area.
Screen Summary
Compliance Determination
This project will have No Effect on listed species because there are no listed species or designated critical habitats in the action area. This project is in compliance with the Endangered Species Act.

Supporting documentation


Are formal compliance steps or mitigation required?

✓ Yes

✓ No
Explosive and Flammable Hazards

<table>
<thead>
<tr>
<th>General requirements</th>
<th>Legislation</th>
<th>Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>HUD-assisted projects must meet Acceptable Separation Distance (ASD) requirements to protect them from explosive and flammable hazards.</td>
<td>N/A</td>
<td>24 CFR Part 51 Subpart C</td>
</tr>
</tbody>
</table>

1. **Is the proposed HUD-assisted project itself the development of a hazardous facility (a facility that mainly stores, handles or processes flammable or combustible chemicals such as bulk fuel storage facilities and refineries)?**

   ✓ No

   Yes

2. **Does this project include any of the following activities: development, construction, rehabilitation that will increase residential densities, or conversion?**

   ✓ No

   Based on the response, the review is in compliance with this section.

   Yes

**Screen Summary**

**Compliance Determination**

Based on the project description the project includes no activities that would require further evaluation under this section. The project is in compliance with explosive and flammable hazard requirements. The proposed project will demolish and reconstruct 18-units divided equally among three six-unit multifamily buildings. The density will not change.

**Supporting documentation**

The Timbers Preservation Project Phase I - 18 Units.pdf

Are formal compliance steps or mitigation required?
Timbers-Preservation-Project-Phase-I

Yes
✓ No
Farmlands Protection

<table>
<thead>
<tr>
<th>General requirements</th>
<th>Legislation</th>
<th>Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>convert farmland to nonagricultural purposes.</td>
<td>et seq.)</td>
<td></td>
</tr>
</tbody>
</table>

1. Does your project include any activities, including new construction, acquisition of undeveloped land or conversion, that could convert agricultural land to a non-agricultural use?

   Yes
   ✓ No

   If your project includes new construction, acquisition of undeveloped land or conversion, explain how you determined that agricultural land would not be converted:

   The proposed project does not include new construction, acquisition of undeveloped land or conversion of agricultural land. The Timbers complex was constructed in 1979. The cemetery property south of the Timbers, 1824 N. Oliver, is owned by Stonemor Kansas, LLC.

   Based on the response, the review is in compliance with this section. Document and upload all documents used to make your determination below.

Screen Summary
Compliance Determination

This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is in compliance with the Farmland Protection Policy Act.

Supporting documentation

Farmland Protection Map.pdf

Are formal compliance steps or mitigation required?

   Yes
   ✓ No
Floodplain Management

<table>
<thead>
<tr>
<th>General Requirements</th>
<th>Legislation</th>
<th>Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Executive Order 11988, Floodplain Management, requires federal activities to</td>
<td>Executive Order 11988</td>
<td>24 CFR 55</td>
</tr>
<tr>
<td>avoid impacts to floodplains and to avoid direct and indirect support of floodplain</td>
<td></td>
<td></td>
</tr>
<tr>
<td>development to the extent practicable.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

1. Do any of the following exemptions apply? Select the applicable citation? [only one selection possible]

   55.12(c)(3)
   55.12(c)(4)
   55.12(c)(5)
   55.12(c)(6)
   55.12(c)(7)
   55.12(c)(8)
   55.12(c)(9)
   55.12(c)(10)
   55.12(c)(11)
   ✓ None of the above

2. Upload a FEMA/FIRM map showing the site here:

   FEMA FIRMette 20173C0357G Zone X.pdf

   The Federal Emergency Management Agency (FEMA) designates floodplains. The FEMA Map Service Center provides this information in the form of FEMA Flood Insurance Rate Maps (FIRMs). For projects in areas not mapped by FEMA, use the best available information to determine floodplain information. Include documentation, including a discussion of why this is the best available information for the site.

   Does your project occur in a floodplain?

   ✓ No
   
   Based on the response, the review is in compliance with this section.

   Yes
Screen Summary

Compliance Determination
This project does not occur in a floodplain. The project is in compliance with Executive Order 11988.

Supporting documentation

FEMA FIRMette 20173C0357G Zone X(1).pdf

Are formal compliance steps or mitigation required?

✓ Yes

✓ No
Historic Preservation

<table>
<thead>
<tr>
<th>General requirements</th>
<th>Legislation</th>
<th>Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Regulations under Section 106 of the National Historic Preservation Act (NHPA)</td>
<td>Section 106 of the National Historic Preservation Act</td>
<td>36 CFR 800 “Protection of Historic Properties”</td>
</tr>
<tr>
<td>impacts on them, and avoid, minimize, or mitigate adverse effects</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Threshold

Is Section 106 review required for your project?

- No, because the project consists solely of activities listed as exempt in a Programmatic Agreement (PA). (See the PA Database to find applicable PAs.)
- No, because the project consists solely of activities included in a No Potential to Cause Effects memo or other determination [36 CFR 800.3(a)(1)].
- Yes, because the project includes activities with potential to cause effects (direct or indirect).

Step 1 – Initiate Consultation

Select all consulting parties below (check all that apply):

- State Historic Preservation Offer (SHPO) Completed
- Indian Tribes, including Tribal Historic Preservation Officers (THPOs) or Native Hawaiian Organizations (NHOs)
- Other Consulting Parties
Describe the process of selecting consulting parties and initiating consultation here:

Tribal Data Base. Wichita City Manager's Office sent consultation invitation letters to the governmental administrations and Tribal Historic Preservation Offices of the Osage Nation, Wichita and Affiliated Tribes and the Cheyenne and Arapaho Tribes -- all of Oklahoma. Only the Osage Nation Historic Preservation Office sent a letter stating "No Properties", but wanted to be contacted if human remains or artifacts were discovered during the project (see attached letter)

Document and upload all correspondence, notices and notes (including comments and objections received below).

**Was the Section 106 Lender Delegation Memo used for Section 106 consultation?**

Yes  
No

---

**Step 2 – Identify and Evaluate Historic Properties**

1. Define the Area of Potential Effect (APE), either by entering the address(es) or uploading a map depicting the APE below:
   
   See attached map and photos

   In the chart below, list historic properties identified and evaluated in the APE. Every historic property that may be affected by the project should be included in the chart.

   Upload the documentation (survey forms, Register nominations, concurrence(s) and/or objection(s), notes, and photos) that justify your National Register Status determination below.

<table>
<thead>
<tr>
<th>Address / Location / District</th>
<th>National Register Status</th>
<th>SHPO Concurrence</th>
<th>Sensitive Information</th>
</tr>
</thead>
</table>

   **Additional Notes:**

2. Was a survey of historic buildings and/or archeological sites done as part of the project?

   Yes
Step 3 – Assess Effects of the Project on Historic Properties

Only properties that are listed on or eligible for the National Register of Historic Places receive further consideration under Section 106. Assess the effect(s) of the project by applying the Criteria of Adverse Effect. (36 CFR 800.5) Consider direct and indirect effects as applicable as per guidance on direct and indirect effects.

Choose one of the findings below - No Historic Properties Affected, No Adverse Effect, or Adverse Effect; and seek concurrence from consulting parties.

- No Historic Properties Affected

- No Adverse Effect

Based on the response, the review is in compliance with this section.

Document reason for finding:

The Kansas SHPO provided a letter dated January 28, 2022, stating: The SHPO has determined that the proposed project will not adversely affect any property listed or determined eligible for listing in the National Register. As far as this office is concerned, the project may proceed.

Does the No Adverse Effect finding contain conditions?

- Yes (check all that apply)

- No

Based on the response, the review is in compliance with this section. Document and upload concurrence(s) or objection(s) below.

Adverse Effect

Screen Summary
Compliance Determination
Based on Section 106 consultation the project will have No Adverse Effect on historic properties. Conditions: None. Upon satisfactory implementation of the conditions, which should be monitored, the project is in compliance with Section 106.

Supporting documentation

- Timbers THPO Consultation Invitation Letters.pdf
- APE Photos - Proposed Timbers Preservation Project Ph 1.pdf
- APE for Timbers Preservation Project Phase I.pdf
- Osage Nation No Properties Ltr.pdf

Are formal compliance steps or mitigation required?
- Yes
- ✓ No
Noise Abatement and Control

<table>
<thead>
<tr>
<th>General requirements</th>
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<th>Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>HUD’s noise regulations protect residential properties from excessive noise exposure. HUD encourages mitigation as appropriate.</td>
<td>Noise Control Act of 1972</td>
<td>Title 24 CFR 51 Subpart B</td>
</tr>
<tr>
<td></td>
<td>General Services Administration Federal Management Circular 75-2: “Compatible Land Uses at Federal Airfields”</td>
<td></td>
</tr>
</tbody>
</table>

1. **What activities does your project involve? Check all that apply:**

✓ New construction for residential use

NOTE: HUD assistance to new construction projects is generally prohibited if they are located in an Unacceptable zone, and HUD discourages assistance for new construction projects in Normally Unacceptable zones. See 24 CFR 51.101(a)(3) for further details.

Rehabilitation of an existing residential property

A research demonstration project which does not result in new construction or reconstruction

An interstate land sales registration

Any timely emergency assistance under disaster assistance provision or appropriations which are provided to save lives, protect property, protect public health and safety, remove debris and wreckage, or assistance that has the effect of restoring facilities substantially as they existed prior to the disaster

None of the above

4. **Complete the Preliminary Screening to identify potential noise generators in the vicinity (1000’ from a major road, 3000’ from a railroad, or 15 miles from an airport).**

**Indicate the findings of the Preliminary Screening below:**

There are no noise generators found within the threshold distances above.
Noise generators were found within the threshold distances.

5. **Complete the Preliminary Screening to identify potential noise generators in the**

- **Acceptable**: (65 decibels or less; the ceiling may be shifted to 70 decibels in circumstances described in §24 CFR 51.105(a))
  
  Indicate noise level here: 65

  Based on the response, the review is in compliance with this section. Document and upload noise analysis, including noise level and data used to complete the analysis below.

- **Normally Unacceptable**: (Above 65 decibels but not exceeding 75 decibels; the floor may be shifted to 70 decibels in circumstances described in §24 CFR 51.105(a))

  Unacceptable: (Above 75 decibels)

  HUD strongly encourages conversion of noise-exposed sites to land uses compatible with high noise levels.

  Check here to affirm that you have considered converting this property to a non-residential use compatible with high noise levels.

  Indicate noise level here: 65

  Document and upload noise analysis, including noise level and data used to complete the analysis below.

**Screen Summary**

**Compliance Determination**

A Noise Assessment was conducted. The noise level was acceptable: 65.0 db. See noise analysis. The project is in compliance with HUD's Noise regulation. Five civil airports were analyzed with FAA 5010 and HUD Airport Noise Worksheets. The Wichita Eisenhower National Airport’s 5010 report showed annual air carrier operations higher than the threshold of 9,000 flights. The Wichita Mid-Continent
Airport Master Plan Noise Contour Map shows and documentation states that the 65 DNL does not extend over residential or any other type of incompatible development. McConnell Air Force Base partnered with the City of Derby, Sedgwick County and City of Wichita in a Joint Land Use Study. Attached is a Noise Contour map showing 65dB as the highest sound contour outside of the Base property. Roadways and railroads were outside the distance thresholds.

Supporting documentation

- ICT Eisenhower 65DNL Noise Contour Map.pdf
- Timbers Preservation Project Phase I - Noise Generators.pdf
- McConnell AFB Noise Contours.pdf
- ICT Eisenhower Airport Worksheet and FAA 5010.pdf
- Jabara Airport Noise Worksheet and FAA 5010.pdf
- Westport Auxiliary Airport Noise Worksheet and FAA 5010.pdf
- Westport Airport Noise Worksheet and FAA 5010.pdf
- Cessna Airport Noise Worksheet and FAA 5010.pdf
- Beech Airport Noise Worksheet and FAA 5010.pdf

Are formal compliance steps or mitigation required?

- Yes

- No
Sole Source Aquifers

<table>
<thead>
<tr>
<th>General requirements</th>
<th>Legislation</th>
<th>Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Safe Drinking Water Act of 1974 protects drinking water systems which are the sole or principal drinking water source for an area and which, if contaminated, would create a significant hazard to public health.</td>
<td>Safe Drinking Water Act of 1974 (42 U.S.C. 201, 300f et seq., and 21 U.S.C. 349)</td>
<td>40 CFR Part 149</td>
</tr>
</tbody>
</table>

1. **Does the project consist solely of acquisition, leasing, or rehabilitation of an existing building(s)?**

   Yes
   ✓ No

2. **Is the project located on a sole source aquifer (SSA)?**

   A sole source aquifer is defined as an aquifer that supplies at least 50 percent of the drinking water consumed in the area overlying the aquifer. This includes streamflow source areas, which are upstream areas of losing streams that flow into the recharge area.

   ✓ No

Based on the response, the review is in compliance with this section. Document and upload documentation used to make your determination, such as a map of your project (or jurisdiction, if appropriate) in relation to the nearest SSA and its source area, below.

Yes

**Screen Summary**

**Compliance Determination**

The project is not located on a sole source aquifer area. The project is in compliance with Sole Source Aquifer requirements.
Supporting documentation

EPA Sole Source Aquifer Map 6-2022.docx

Are formal compliance steps or mitigation required?
  Yes
  ✓ No
Wetlands Protection

General requirements | Legislation | Regulation
--- | --- | ---
Executive Order 11990 discourages direct or indirect support of new construction impacting wetlands wherever there is a practicable alternative. The Fish and Wildlife Service’s National Wetlands Inventory can be used as a primary screening tool, but observed or known wetlands not indicated on NWI maps must also be processed. Off-site impacts that result in draining, impounding, or destroying wetlands must also be processed.

Executive Order 11990 | 24 CFR 55.20 can be used for general guidance regarding the 8 Step Process.

1. Does this project involve new construction as defined in Executive Order 11990, expansion of a building’s footprint, or ground disturbance? The term "new construction" shall include draining, dredging, channelizing, filling, diking, impounding, and related activities and any structures or facilities begun or authorized after the effective date of the Order

   No

   ✓ Yes

2. Will the new construction or other ground disturbance impact an on- or off-site wetland? The term "wetlands" means those areas that are inundated by surface or ground water with a frequency sufficient to support, and under normal circumstances does or would support, a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bogs, and similar areas such as sloughs, potholes, wet meadows, river overflows, mud flats, and natural ponds.

"Wetlands under E.O. 11990 include isolated and non-jurisdictional wetlands."

✓ No, a wetland will not be impacted in terms of E.O. 11990’s definition of new construction.

   Based on the response, the review is in compliance with this section. Document and upload a map or any other relevant documentation below which explains your determination

Yes, there is a wetland that be impacted in terms of E.O. 11990’s definition of new construction.

Screen Summary
Compliance Determination

The project will not impact on- or off-site wetlands. The project is in compliance with Executive Order 11990.

Supporting documentation

Wetlands Mapper 6-3-2022.pdf

Are formal compliance steps or mitigation required?

✓ No
Wild and Scenic Rivers Act

<table>
<thead>
<tr>
<th>General requirements</th>
<th>Legislation</th>
<th>Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Wild and Scenic Rivers Act provides federal protection for certain free-flowing, wild, scenic and recreational rivers designated as components or potential components of the National Wild and Scenic Rivers System (NWSRS) from the effects of construction or development.</td>
<td>The Wild and Scenic Rivers Act (16 U.S.C. 1271-1287), particularly section 7(b) and (c) (16 U.S.C. 1278(b) and (c))</td>
<td>36 CFR Part 297</td>
</tr>
</tbody>
</table>

1. **Is your project within proximity of a NWSRS river?**

   ✓ No

   Yes, the project is in proximity of a Designated Wild and Scenic River or Study Wild and Scenic River.

   Yes, the project is in proximity of a Nationwide Rivers Inventory (NRI) River.

**Screen Summary**

**Compliance Determination**

This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act.

**Supporting documentation**

[Interactive Map of NPS Wild and Scenic Rivers - 2022.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

✓ No
Environmental Justice

<table>
<thead>
<tr>
<th>General requirements</th>
<th>Legislation</th>
<th>Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Determine if the project creates adverse environmental impacts upon a low-income or minority community. If it does, engage the community in meaningful participation about mitigating the impacts or move the project.</td>
<td>Executive Order 12898</td>
<td></td>
</tr>
</tbody>
</table>

HUD strongly encourages starting the Environmental Justice analysis only after all other laws and authorities, including Environmental Assessment factors if necessary, have been completed.

1. Were any adverse environmental impacts identified in any other compliance review portion of this project’s total environmental review?

   Yes

   ✓ No

   Based on the response, the review is in compliance with this section.

Screen Summary
Compliance Determination
No adverse environmental impacts were identified in the project’s total environmental review. The project is in compliance with Executive Order 12898. This proposed project involves the reconstruction of three multifamily buildings with six one-bedroom apartments in each one. Demolition and reconstruction will allow complete compliance with ADA regulations.

Supporting documentation

Are formal compliance steps or mitigation required?

   Yes

   ✓ No