

**Environmental Assessment
Determinations and Compliance Findings
for HUD-assisted Projects
24 CFR Part 50**

Project Information

Project Name: New-Samaritan-Parkville-202

HEROS Number: 900000010096579

Applicant / Grant Recipient: New Samaritan Corporation

Point of Contact: Molly Moskal

HUD Preparer: Michael Transom

Consultant (if applicable): Eagle Environmental, Inc.

Point of Contact: Robert Kovach

Project Location: 126-130 New Park Avenue , Hartford, CT 06106

Additional Location Information:

The subject consists of four contiguous tax parcels located at 126/130 New Park Avenue, 8-10 Francis Court, and 161 Francis Court; and can be further identified by the following parcel ID#'s: 137-481-094, 137-481-095, 137-481-096 and 137-481-097. The project is located in the Parkville neighborhood of Hartford, CT, which is on the western side of the City. Half of the neighborhood (roughly from New Park Avenue to the east) was listed as a historic district on the National Register of Historic Places in 2015. The subject site is bound by New Park Avenue on the western perimeter, Francis Court on the southern perimeter, and Francis Avenue on the eastern perimeter; and represents a southern blockfront. The immediate area consisting of single-family residential homes to the north and commercial uses to the south and

west, and industrial uses to the east. A Stop and Shop Grocery Store is located directly across the street from the site while an assortment of other fast food/retail/community facility establishments are within a half mile radius of the subject. The largest proximate commercial development is the Prospect Plaza Shopping Center, which is a retail strip center consisting of local in line tenants. Parkville contains one of four CTfastrack bus station rapid transit lines which connects Downtown Hartford to Downtown New Britain. The nearest station to the subject is the Elmwood Station, which is one mile south. Local attractions include the Parkville Market, which is a local bazaar with 19 restaurants, 20 retail merchants, and bar/event space, as well as several parks which include the Elizabeth Park Conservancy, Pope Park, and Bushnell Park.

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

The project, New Samaritan Parkville, will be located at 126 New Park Avenue within the Parkville neighborhood of the City of Hartford, CT. Each parcel is further identified by the following Parcel ID#'s: 137-481-094, 137-481-095, 137-481-096 and 137-481-097. The project entails the construction of one, four-story elevator serviced building situated on 0.52 acres of land and will contain 22 affordable apartment units restricted to seniors aged 62 years of age or older. The unit mix will consist entirely of one-bedroom PRAC units limited to tenants earning 50% AMI or lower and the total net rentable area of the project is estimated to be 13,794 square feet. Community amenities will include a community room with kitchen, a wellness suite, a guest suite for visiting family members, laundry rooms located on the second through fourth floors, a media room, and a resident service coordinator. The project is being financed under the HUD Section 202 Capital Advance Program: Supportive Housing for the Elderly, which provides interest-free capital advances to private, nonprofit sponsors to finance the development of supportive housing for the elderly. The capital advance does not have to be repaid as long as the project serves very low-income elderly persons for 40 years. Construction is anticipated to commence in June 2021 with a construction duration of approximately 14 months. As stated on the HUD 2328 form, the total estimated cost for the project is estimated at \$6,602,016 or \$300,091 per unit. Funding for the project will consist of \$650,000 in HOME funds from the City of Hartford, \$500,000 from HOME funds from the State of Connecticut, 2.5 million dollars of equity from the sponsor, and the remaining balance will be from HUD funds from the Section 202 program.

Does this project involve over 200 lots, dwelling units, or beds?

No

Yes (Consult early with the Environmental Clearance Officer (ECO), who is required to sign off on this project if it requires an Environmental Assessment)

Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:

New Samaritan Corporation currently has over 3,400 seniors on waiting lists for its approximately 2,400 units demonstrating a high need for additional affordable senior housing throughout the state. Wait times vary from three to five years at most sites. Additionally, the project is located in an area with the only full service grocery store

located adjacent to the property and within 1-mile of public transportation and a medical facility.

Existing Conditions and Trends [24 CFR 58.40(a)]:

The proposed Project is in a neighborhood experiencing significant private and public investment in retail, commercial, and housing development that is demonstrably changing the economic character of the area, as a result of ongoing economic revitalization efforts. Trends likely to continue in absence of the project include wait lists continuing to grow as the demand for the limited affordable senior housing stock continues to increase with the ever growing senior population.

Maps, photographs, and other documentation of project location and description:

[New Samaritan Parkville 202 Site Location Map.pdf](#)

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

Review Certified by	Sheila Galicki, Chief, TS	on	07/30/2021
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Funding Information

Grant / Project Identification Number	HUD Program	Program Name
017-EE120	Housing: Multifamily FHA	Section 202. Supportive Housing for the Elderly
TBD	Community Planning and Development (CPD)	HOME Program

Estimated Total HUD Funded, Assisted or Insured Amount: \$4,501,900.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$6,602,016.00

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

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6	Are formal compliance steps or mitigation required?	Compliance determination (See Appendix A for source determinations)
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6		
Airport Hazards Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	According to Federal Aviation Administration (FAA) information accessed at https://oeaaa.faa.gov/oeaaa/external/searchAction.jsp?action=showCircleSearchAirportsForm and http://nepassisttool.epa.gov/nepassist/entry.aspx , there are no military airports within 15,000 feet of the subject property or civilian airport runways within 2,500 feet of the subject property. The nearest airport is the Hartford-Brainard Airport, a civilian airport, which is four miles east of the subject. The proposed undertaking is in compliance with HUD's Airport Hazard regulations and no mitigation is warranted. The project is in compliance with Airport Hazards requirements.
Coastal Barrier Resources Act Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	According to Coastal Barrier Resource Area information accessed at http://www.fws.gov/CBRA/Maps/index.html , the subject property is not located within a Coastal Barrier Resource Area. Therefore, the project is in compliance with Coastal Barrier Resource Area regulations and no mitigation nor further investigation is warranted. Therefore, this project has no potential to impact a CBRS Unit and is in compliance with the Coastal Barrier Resources Act.
Flood Insurance Flood Disaster Protection Act of	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	According to FEMA Flood Insurance Rate Map (FIRM) #09003C-0364F, dated

<p>1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]</p>		<p>September 26, 2008, the subject property is located in Unshaded Zone X, designated as an area outside the 100 and 500-year flood zones and the flood potential for the subject property is minimal. According to the FEMA Flood Map Service Center accessed at https://msc.fema.gov/portal/home, there are no preliminary or pending FIRMs for the subject property. According to the National Flood Insurance Program (NFIP) Community Status Book accessed at https://www.fema.gov/national-flood-insurance-program-community-status-book, the subject property is located in Community ID #095080 which is a participating community in the NFIP. However, as no structures or insurable property are located within a Special Flood Hazard Area (100-year flood zone), flood insurance is not required under the NFIP. 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.</p>
<p>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5</p>		
<p>Air Quality Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>According to http://www.epa.gov/airquality/greenbk/ancl.html and the EPA NEPAAssist tool accessed at https://www.epa.gov/nepa/nepassist, the subject property is located within a Non-attainment area for 8-Hour Ozone (2015 standard). The proposed project includes the new construction of a four (4) story building, 22-unit senior housing apartment complex. This project does not exceed de minimis emissions levels or the screening level established by the state or air quality management district</p>

		<p>for the pollutant(s) identified above. Furthermore, based on a Conformity Determination letter between HUD and the Maryland Department of the Environment (MDE), any construction projects that are similar to or smaller in size than the Fairfield Ranch Commons and Race Street Apartments' case (500+ Units) in terms of duration, square footage and overall size, should not exceed the de minimis levels established by the state and therefore do not need to undergo a detailed conformity analysis. The proposed action is smaller than the Fairfield Ranch Commons and Race Street Apartments and no additional action appears warranted at this time. Lastly, development of a multi-family project will not result in emission levels of criteria pollutants, including de minimis levels since apartment project are not generally considered to be static source generators of air pollutants. The project is in compliance with the Clean Air Act.</p>
<p>Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>According to the National Oceanic and Atmospheric Administration (NOAA) Office for Coastal Management (OCM) accessed at https://coast.noaa.gov/czm/mystate/, East Hartford is located within a planning area, however, it is not located within a Coastal Management Zone. Therefore, the proposed undertaking is in compliance with HUD's Coastal Zone Management Act regulations and no consultation nor mitigation measures are warranted. The project is in compliance with the Coastal Zone Management Act. The Coastal Zone Management PDF has been reviewed.</p>
<p>Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Site contamination was evaluated as follows: ASTM Phase I ESA, ASTM Phase II ESA, Remediation or clean-up plan, ASTM Vapor Encroachment Screening. On-site or nearby toxic, hazardous, or</p>

		<p>radioactive substances were found that could affect the health and safety of project occupants or conflict with the intended use of the property. Heating oil tanks served the previous onsite structures prior to gas conversion which may have resulted in releases to the environment due to tank failures and/or overfilling and due to the urban setting and site-wide demolition activities that occurred in the late 1960s at 161 Francis Avenue and the late 2000s for the remaining three parcels, fill material may be present on the Site and could contain contaminant constituents. Additionally, several potential off-Site sources of contamination are located nearby and adjacent to the Site. The former Royal Typewriter Manufacturer at 150 New Park Avenue, the Capitol Foundry at Bartholomew and Hamilton Street and the M.S. Little Manufacturing Company at 151 Park Avenue operated since the early 1900s to approximately the 1950s. The former Royal Arco Service (now VEB Auto Sales) located at 125 New Park Avenue (approximately 60 feet west of the Site) is documented as a historical gasoline service station from at least 1969 to 1982 and also as an automotive repair facility until 2009. The adverse environmental impacts can be mitigated through the complete removal of contaminated soils. With mitigation, identified in the mitigation section of this review, the project will be in compliance with contamination and toxic substances requirements. Eagle Environmental recommends a closure report documenting the soil removal activities be prepared. The report will include a description and mapping of the extent of the final removal areas, confirmation soil sampling locations and results, disposal characterization results, soil</p>
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		disposal documentation, re-use implementation, and all field methodologies utilized during the project.
<p>Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The HUD reviewer obtained an Official Species List for the subject property using the USFWS Information for Planning and Consultation (IPaC) website accessed at https://ecos.fws.gov/ipac/. According to the Official Species List, there are no federally-listed species located within the subject property boundaries. Therefore, the HUD reviewer has determined that the proposed project will have no effect on endangered species that may occur within the action area (subject property). In addition, the proposed project will have no effect on federally designated critical habitat. Therefore, the proposed undertaking will be in compliance with HUD's Endangered Species regulations and no consultation nor mitigation measures are required. This project is in compliance with the Endangered Species Act.</p>
<p>Explosive and Flammable Hazards Above-Ground Tanks[24 CFR Part 51 Subpart C</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>There are no current or planned stationary aboveground storage containers of concern within 1 mile of the project site. The project is in compliance with explosive and flammable hazard requirements. The project does not include a hazardous facility. The project will increase residential density with 22 new units for elderly housing. There are no known current or planned stationary aboveground storage containers within 1-mile. The Connecticut Department of Energy and Environmental Protection does not currently maintain a list of aboveground storage tanks (ASTs) however, no ASTs were observed during the July 2019 Phase I ESA site reconnaissance. Refer to Attachment 9.</p>

<p>Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>According to the U.S. Census Bureau Urbanized Area Map, accessed at http://tigerweb.geo.census.gov/tigerweb/, the subject property is located within an urbanized area; therefore, the subject property is already in an area committed to urban development and is exempt from compliance with the Farmland Protection Policy Act per 7 CFR Part 658.2. The project is in compliance with HUD's Farmlands regulations and no mitigation is warranted. The project is in compliance with the Farmland Protection Policy Act.</p>
<p>Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>According to FEMA Flood Insurance Rate Map (FIRM) #09003C-0364F, dated September 26, 2008, the subject property is located in Unshaded Zone X, designated as an area outside the 100 and 500-year flood zones and the flood potential for the subject property is minimal. According to the FEMA Flood Map Service Center accessed at https://msc.fema.gov/portal/home, there are no preliminary or pending FIRMs for the subject property. According to the National Flood Insurance Program (NFIP) Community Status Book accessed at https://www.fema.gov/national-flood-insurance-program-community-status-book, the subject property is located in Community ID #095080 which is a participating community in the NFIP. However, as no structures or insurable property are located within a Special Flood Hazard Area (100-year flood zone), flood insurance is not required under the NFIP. 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.</p>

<p>Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>A review of the National Register of Historic Places indicates that the subject property and the vicinity properties within the APE are not listed on the National Register of Historic Places; However the subject and surrounding vicinity is within the Parkville National Register Historic District (NR#15000112). To assist HUD in making its historic preservation determination, a representative of the owner submitted this finding and project information to the appropriate State Historic Preservation Officer (SHPO). SHPO determined that the project was not compliant with the design specifications of the surrounding historic district and found that an adverse effect would result from the initial project designs. The original project designs have been modified in order to further mitigate the adverse impact to the historic district, however even with the changes, SHPO concluded that the revised scope of work continues to constitute an adverse effect to historic resources. In order to resolve the adverse effects, SHPO is requesting a condition of the project to include a requirement that the Project Sponsor must allocate \$20,000 for use in the rehabilitation of historic properties within the City of Hartford, in consort with funding offered through the City's rehabilitation programs. All work shall be in a manner that meets the Secretary of the Interior's Standards for the Treatment of Historic Properties. Transfer of funds shall be completed before any site work begins. The HUD reviewer attempted to contact three tribes which hold a historical interest in the subject area on October 28, 2020. A response was received from the Mohegan Tribe of Indians of Connecticut and the Narragansett</p>
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		<p>Indian Tribe; each of which had no further concerns with the project as proposed. The two responding tribes requested that if and inadvertent discoveries are made during the construction process that they be contacted immediately. As of 07/16/2021, a response has yet to be received from the Mashantucket Pequot Indian Tribe. The project is in compliance with Section 106.</p>
<p>Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The subject property is located within 1,000 feet of a major roadway, within 3,000 feet of a railroad and within 15 miles of a commercial or military airport. New Park Avenue, which is located along the western side of the Site approximately 50 feet from the western edge of the proposed Site building, is classified as a minor arterial roadway. The Hartford to New Haven CTRail/Amtrak rail line is located approximately 350 feet from the eastern edge of the proposed Site building. Railway assessment factors were developed using a combination of publically available rail schedules and rolling stock information from CTRail Hartford Line website and assumptions or suggested default noise assessment values/conditions. Hartford Brainard Airport (HFD) and Bradley International Airport (BDL) are located 2.9 miles east-southeast and 12 miles north of the Site, respectively. Pertinent data was entered into the HUD Airport Noise Worksheets for each airport, based on FAA operational data accessed as indicated in the worksheet instructions. A review of each airports noise contour mapping and approach directions revealed that there was no noise potential for noise contribution to the site. A Noise Assessment was conducted and the overall noise level of 63dB was found to be acceptable. See noise</p>

		analysis. The project is in compliance with HUD's Noise regulation.
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	According to the Sole Source Aquifer layer obtained from EPA NEPAassist, accessed at http://nepassisttool.epa.gov/nepassist/entry.aspx , the subject property is not located within the boundaries of a Sole Source Aquifer. Therefore, the proposed undertaking is in conformance with HUD's Sole Source Aquifer requirements and no consultation nor mitigation measures are warranted. The project is in compliance with Sole Source
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	According to the USFWS National Wetlands Inventory Layer accessed at http://nepassisttool.epa.gov/nepassist/entry.aspx and visual observations, there are no wetland areas on the subject property. Therefore, the proposed undertaking will be in compliance with Executive Order (EO) 11990, Protection of Wetlands, as well as the requirements of Federal Register 24 CFR Parts 50, 55 and 58. The project is in compliance with Executive Order 11990.
Wild and Scenic Rivers Act Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	According to the National Wild and Scenic Rivers website accessed at https://www.rivers.gov/map.php , there are no Wild and Scenic Rivers in the vicinity of the subject property. Therefore, the subject property is in conformance with HUD's Wild and Scenic Rivers regulations and no consultation nor mitigation measures are warranted. The project is in compliance with the Wild and Scenic Rivers Act.
HUD HOUSING ENVIRONMENTAL STANDARDS		
Housing Requirements (50) [MAP Guide - Chapter 9: Lead-based paint, Radon, and Asbestos]	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	See appendix for compliance with Housing Requirements.
ENVIRONMENTAL JUSTICE		

<p>Environmental Justice Executive Order 12898</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>The immediately surrounding properties consist of primarily residential use, with beneficial commercial developments to the south and west of the subject and industrial uses to the east. Industrial sections are separated from the subject site via a CT Fastrack Bus Lane, which acts as a man made barrier separating industrial activities from the rest of the subject neighborhood. These land uses are not expected to have a detrimental environmental impact to the subject property. Adverse environmental impacts that are disproportionately high for low-income and/or minority communities were identified on the subject site. With mitigation, identified in the mitigation section of this review, the project will be in compliance with Executive Order 12898.</p>
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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.

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	The Site is located in a Main Street (MS3) and neighborhood mixed use (NX1) zone of Hartford, and is designated as being in an area targeted for transit oriented development. These zoning classifications are all compatible with the proposed Project. In 2013, the City was approved for creation of a Neighborhood Revitalization Strategy Area (NRSA) in the Parkville	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		neighborhood, within which the Project is located. The Project will advance the objectives of the NRSA, in part by increasing the diversity in housing options available in the neighborhood, increasing access to medical and social services for elderly and low income residents, improving coordination of community based services with City services, and assembling and redeveloping blighted properties.	
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2	The Project site is located within an urbanized area of Hartford, Connecticut. Grades are relatively flat, and existing drainage infrastructure is present in the areas surrounding the Project site.	
Hazards and Nuisances including Site Safety and Site-Generated Noise	2	Environmental site assessment (ESA) activities conducted at the Project site identified the presence of impacted fill materials, as is common in urbanized areas. This soil contains coal ash and other non soil materials that may result in the presence of semi volatile compounds, petroleum hydrocarbons, and/or elevated metals concentrations in the soil. The development plan includes provisions for appropriately managing excavated soil and mitigating related hazards in accordance with State and Federal environmental regulations. The Project site is located adjacent to New Park Avenue, which is considered a minor arterial street, and Francis Street, which is a neighborhood road. Interstate 84, the nearest major roadway, is located approximately 1,100 feet south of the Project site. A rail corridor containing the CTfastrak bus rapid transit (BRT) busway and a railroad line that supports CTrail's Hartford Line and Amtrak commuter	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>and regional rail services is located approximately 350 feet east of the eastern end of the Project site. The Hartford Brainard general aviation airport (HFD) and Bradley International Airport (BDL) are located approximately 2.8 miles east southeast and 12.1 miles north of the Project site, respectively. The Project site is not within either airport's approach corridor, and is well outside the zone of noise exposure greater than 65 db shown on HFD and BDL noise exposure mapping. HFD was not evaluated further, based on available flight operations data. The ratio of the Project location's distance to the BDL flight path to the distance from the runway flight path to the 65 db DNL contour is greater than 3.0, precluding BDL from further consideration, based on HUD Noise Assessment Guidelines. An evaluation of noise concerns associated with New Park Avenue and the BRT/rail corridor using HUD evaluation tools indicates that existing noise levels are within the ACCEPTABLE range, which is defined as less than 65 db. See Attachment 1. Standard building construction materials and methods are deemed adequate to reduce interior noise levels to comfortable levels for building occupants without additional mitigation measures.</p>	
Energy Consumption/Energy Efficiency	1	<p>The Project design incorporates energy efficient elements, and energy consumption is anticipated to be in the typical range for multifamily residential housing. The electrical utility service infrastructure is anticipated to be sufficient to absorb the needs of the Project, which is supported by the</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		proximity of commercial development immediately to the south of the Project site.	
SOCIOECONOMIC			
Employment and Income Patterns	1	The Project site is located in an area of Hartford that has a high rate of low income residents. Although many residents of the Project's proposed housing development will be seniors that may longer be part of the workforce, the Project is anticipated to assist in the ongoing economic revitalization of the neighborhood by providing support to businesses in the surrounding area.	
Demographic Character Changes / Displacement	2	The Project site is located near the southern edge of a primarily multifamily residential area, with a more commercialized area to the south. The Project is consistent with the existing character of the neighborhood. The existing properties that will comprise the Project site are vacant and will not require displacement of any existing residents or businesses.	
COMMUNITY FACILITIES AND SERVICES			
Educational and Cultural Facilities (Access and Capacity)	2	Two educational institutions offering adult educational opportunities are located within two miles of the Project site. At least two public libraries and multiple fine arts and performing arts venues are available within two miles of the Project site. A variety of faith based centers serving the neighborhood are present within one mile of the Project site, several within easy walking distance of the Site.	
Commercial Facilities (Access and Proximity)	2	Numerous restaurants and other commercial businesses are located near the Project site, primarily to the south of the site. A large grocery store additionally offering pharmacy services	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		is located adjacent to the proposed Project site. Heavily commercial areas along New Park Avenue, with the exception of the grocery store, are generally located greater than one quarter mile to the south of the site.	
Health Care / Social Services (Access and Capacity)	2	Numerous State and private health care and social services providers serve the Hartford community. One urgent care center is located within one half mile of the Project site, and several other medical service providers, including two major hospitals, are located within two miles of the Project site. The Project site's location within the City and accessibility to public transportation will facilitate access to these resources. Two senior centers are located within one half mile of the Project site, and at least one senior service provider, Independence Unlimited, is located within easy walking distance of the site. Two pharmacies are located within one half mile of the site.	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	2	The City provides residential solid waste and recyclable pick up service. Multiple vendors serve the area of the Project site for commercial solid waste and recycling pick up service.	
Waste Water and Sanitary Sewers (Feasibility and Capacity)	2	The area of the Project site is served by public sanitary sewer supplied through the Metropolitan District Commission (MDC). The area of the Project site is served by public water supplied through the MDC.	
Water Supply (Feasibility and Capacity)	2	The area of the Project site is served by public water supplied through the MDC.	
Public Safety - Police, Fire and Emergency Medical	2	The area of the Project site has good access to high quality Public Safety services. Multiple City fire stations are located within less than two miles of the Project site, including one station	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		with a ladder truck located less than a mile from the site.	
Parks, Open Space and Recreation (Access and Capacity)	2	Two parks and a recreational center are located within one mile of the Project site. The nearby CTfastrak station and bus route provide convenient access to numerous other recreational venues within the City of Hartford and surrounding communities.	
Transportation and Accessibility (Access and Capacity)	2	The Project site is easily accessible to vehicular traffic, and is located within easy walking distance to public transportation, including a CTfastrak busway station, which provides easy access to downtown Hartford and multiple commercial areas along the Hartford New Britain corridor.	
NATURAL FEATURES			

Supporting documentation

[NewSamaritanParkville Site Plan Approval.pdf](#)

[TMData-NewPark_Stn245.pdf](#)

[NewSamaritan-DNLCalculation.pdf](#)

[NewSamaritan-Airports.pdf](#)

[HFD-AirportNoiseWorksheet2018.pdf](#)

[Existing_NEMupdate_NEM1.pdf](#)

[HFD-AirportIQ 5010.pdf](#)

[BDL-AirportNoiseWorksheet2018.pdf](#)

[BDL-AirportIQ 5010.pdf](#)

[Environmental-Assessment-Factors-and-Analysis-Partner-Worksheet \(2\).pdf](#)

Additional Studies Performed:

None

Field Inspection [Optional]: Date and completed

by:

Kristi Gagnon

7/23/2019 12:00:00 AM

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

Original Project funding application, Tab J New Samaritan Response to HUD Notice of Curable Deficiency, dated December 20, 2019 Exhibit 4: Market Study/Need Assessment Market Study by Valbridge Property Advisors, dated April 30, 2020 Phase I Environmental Site Assessment by Eagle Environmental, dated July 2019 Phase II Environmental Site Assessment by Eagle Environmental, dated August 2019 Environmental Record Review by Eagle Environmental, dated June 2019 Commercial Site Plan Review by City of Hartford Dept.of Development Svcs.-Planning Division, dated November 30, 2020 CTrail and Amtrak service schedules and customer service contact, December 15, 2020 CT DOT traffic monitoring data portal

List of Permits Obtained:

Typical construction-related permits will be required for this project. Site plan review was completed by the City of Hartford on November 30, 2020. Aside from minor recommended modifications, the plans were found to be in compliance with zoning standards, and no special Planning and Zoning exceptions or approvals are anticipated to be necessary. Specific permit requirements will be determined as Project design progresses.

Public Outreach [24 CFR 58.43]:

Public outreach, outside of potential Section 106 Review public meetings, was not included.

Cumulative Impact Analysis [24 CFR 58.32]:

Although the Project is only proposed to add 22 housing units, it will advance to goal of creating additional housing capacity for low-income residents, particularly for senior residents, to reduce the deficit of available housing identified in the City

Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]

The proposed Project aligns well with the economic and social goals for the Parkville neighborhood. The site selected is well suited for the Project development, and no alternative sites were identified within the neighborhood that would not involve resident displacement, demolition of existing structures, and/or more complicated ownership resolution.

No Action Alternative [24 CFR 58.40(e)]

The proposed Project will address a critical need for affordable housing options in the City of Hartford, specifically for seniors. While the 22 units proposed as part of the Project will not by themselves have a significant impact on addressing the demonstrated need for additional belowmarket, age-restricted senior housing, the

proposed Project and related projects are a vital part of the strategy to address the need. The need for age-restricted housing is anticipated to accelerate as the percentage of seniors increases relative to the total population. The no-action alternative would be a setback to the extensive efforts being made to revitalize the Parkville neighborhood.

Summary of Findings and Conclusions:

In conclusion, the Environmental Assessment identified three (3) aspects that will require mitigation: Site Contamination, Historic Preservation, and Radon Testing post construction. As outlined within, contaminated soils will be removed from the subject site as well as asphalt tailings being managed/removed/reused to avoid cross contaminating of clean material; radon mitigation measures (radon resistant construction) will be implemented in the project design in accordance with HUD guidelines with post construction radon testing required to document acceptable indoor radon levels. A closure report documenting the soil removal activities will be prepared post remediation. The report must include a description and mapping of the extent of the final removal areas, confirmation soil sampling locations and results, disposal characterization results, soil disposal documentation, re-use implementation, and all field methodologies utilized during the project. The proposed project as designed will not result in a significant impact on the quality of the human environment.

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.

Law, Authority, or Factor	Mitigation Measure or Condition	Comments on Completed Measures	Mitigation Plan	Complete
Environmental Justice	Contaminated soils will be completely removed from the site and asphalt tailings will be managed/removed/reused to avoid cross contamination of clean material, as part of the Risk Based Corrective Action Plan highlighted in the Phase III prepared by Eagle Environmental.	N/A		

<p>Historic Preservation</p>	<p>As a condition to resolve the adverse effect, The Project Sponsor must allocate \$20,000 for use in the rehabilitation of historic properties within the city of Hartford, in concert with funding offered through the City's rehabilitation programs. All work shall be in a manner that meets the Secretary of the Interior's Standards for the Treatment of Historic Properties. Transfer of funds shall be completed before any site work begins.</p>	<p>N/A</p>		
<p>Contamination and Toxic Substances</p>	<p>Based on the Phase II analytical results there are several areas of fill material that contain concentrations of compounds below regulatory criteria. Unsuitable fill materials must be removed from the site and they must be properly managed in accordance with applicable regulations. Additionally, asphalt tailings should be managed/removed/reused to avoid cross contamination of clean material. Eagle Environmental anticipates the complete removal of contaminated soils will cost \$264,156. A closure report documenting the soil removal activities will be prepared. The report will include a description and mapping of the extent of the final removal areas, confirmation soil sampling locations and results, disposal characterization results, soil disposal documentation, re-use implementation, and all field methodologies utilized during the project.</p>	<p>N/A</p>		

<p>Housing Requirements (50)</p>	<p>Radon - Radon mitigation measures are required to be implemented in the project design and construction in accordance with HUD guidelines. Mitigating potential radon contamination should be achieved by constructing the proposed structure(s) to meet all of the requirements of the ANSI/AARST CC-1000 2018 Soil Gas Control Systems in New Construction of Buildings (CC-1000 2018) standard or, if appropriate, the ANSI/AARST CCAH 2013 Reducing Radon in New Construction of One- & Two-Family Dwellings and Townhouses (CCA 2013) standard, for the installation of passive systems. If a passive system is included in the construction, an OM&M plan must be drafted and adhered to for the term of the HUD loan. Radon testing must be performed following construction activities and prior to Final Endorsement. Radon testing must be done in accordance with the protocols set by the American Association of Radon Scientists and Technologists, Protocol for Conducting Radon and Radon Decay Product Measurements in Multifamily Buildings (ANSI-AARST MAMF-2017). Testing must include 100% of ground floor units and 10% of upper floor units in all buildings included in the project. Occupation of the units will not be permitted until the results have been sent to HUD for review and acceptance that</p>	<p>N/A</p>		
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	demonstrates radon levels are below 4.0 picocuries per liter (4.0 pCi/L).			
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Project Mitigation Plan

Contaminated soils will be completely removed from the subject site at an estimated cost of \$264,156. Post remediation, a closure report documenting the soil removal activities must be prepared by a qualified environmental professional. Radon resistant construction techniques are required during construction with post-construction radon testing conducted by a licensed Radon contractor as outlined above. \$20,000 to be transferred to City of Hartford (or the the required party(s)) to satisfy the Adverse Effect mitigation required by CT-SHPO, prior to any site or construction work.

[Hartford New Park Avenue 126 MOA Draft 2.pdf](#)

[Hartford New Park Avenue 126 MOA NSC Signed.pdf](#)

[Hartford New Park Avenue 126 MOA NSC SHPO Signed.pdf](#)

[Hartford New Park Avenue 126 MOA Draft - Copy.pdf](#)

[Executed MOA.pdf](#)

[CPD Funding Approving Official Document\(1\)\(1\).pdf](#)

[Delegation of Authority.pdf](#)

[State of Connecticut Funding Approving Official Document.pdf](#)

[State of Connecticut Additional Approving Official Signature Page.pdf](#)

[City of Hartford Funding Approving Official Document.pdf](#)

[City of Hartford Additional Approving Official Signature Page - Signed.pdf](#)

Supporting documentation on completed measures

APPENDIX A: Related Federal Laws and Authorities

Airport Hazards

General policy	Legislation	Regulation
It is HUD's policy to apply standards to prevent incompatible development around civil airports and military airfields.		24 CFR Part 51 Subpart D

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

According to Federal Aviation Administration (FAA) information accessed at <https://oeaaa.faa.gov/oeaaa/external/searchAction.jsp?action=showCircleSearchAirportsForm> and <http://nepassisttool.epa.gov/nepassist/entry.aspx>, there are no military airports within 15,000 feet of the subject property or civilian airport runways within 2,500 feet of the subject property. The nearest airport is the Hartford-Brainard Airport, a civilian airport, which is four miles east of the subject. The proposed undertaking is in compliance with HUD's Airport Hazard regulations and no mitigation is warranted. The project is in compliance with Airport Hazards requirements.

Supporting documentation

[Attachment 1-Airport hazards.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Coastal Barrier Resources

General requirements	Legislation	Regulation
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.	Coastal Barrier Resources Act (CBRA) of 1982, as amended by the Coastal Barrier Improvement Act of 1990 (16 USC 3501)	

1. Is the project located in a CBRS Unit?

No

Document and upload map and documentation below.

Yes

Compliance Determination

According to Coastal Barrier Resource Area information accessed at <http://www.fws.gov/CBRA/Maps/index.html>, the subject property is not located within a Coastal Barrier Resource Area. Therefore, the project is in compliance with Coastal Barrier Resource Area regulations and no mitigation nor further investigation is warranted. Therefore, this project has no potential to impact a CBRS Unit and is in compliance with the Coastal Barrier Resources Act.

Supporting documentation

[Attachment 2 - CBRS Mapper.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Flood Insurance

General requirements	Legislation	Regulation
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.	Flood Disaster Protection Act of 1973 as amended (42 USC 4001-4128)	24 CFR 50.4(b)(1) and 24 CFR 58.6(a) and (b); 24 CFR 55.1(b).

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:

[Attachment 3 - FEMA Flood map\(2\).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

Screen Summary **Compliance Determination**

According to FEMA Flood Insurance Rate Map (FIRM) #09003C-0364F, dated September 26, 2008, the subject property is located in Unshaded Zone X, designated as an area outside the 100 and 500-year flood zones and the flood potential for the subject property is minimal. According to the FEMA Flood Map Service Center accessed at <https://msc.fema.gov/portal/home>, there are no preliminary or pending FIRMs for the subject property. According to the National Flood Insurance Program (NFIP) Community Status Book accessed at <https://www.fema.gov/national-flood-insurance-program-community-status-book>, the subject property is located in Community ID #095080 which is a participating community in the NFIP. However, as no structures or insurable property are located within a Special Flood Hazard Area (100-year flood zone), flood insurance is not required under the NFIP. 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

[Community Status Book.pdf](#)

[Attachment 3 - FEMA Flood map.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Air Quality

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

Carbon Monoxide

Lead

Nitrogen dioxide

Sulfur dioxide

- ✓ Ozone
- Particulate Matter, <2.5 microns
- Particulate Matter, <10 microns

3. What are the *de minimis* emissions levels (40 CFR 93.153) or screening levels for the non-attainment or maintenance level pollutants indicated above

Ozone 25.00 ppb (parts per million)

Provide your source used to determine levels here:

<https://www.epa.gov/general-conformity/de-minimis-tables>

<https://www.epa.gov/sites/production/files/2017-10/documents/ct-22a-174-3a.pdf>

4. Determine the estimated emissions levels of your project. Will your project exceed any of the *de minimis* or threshold emissions levels of non-attainment and maintenance level pollutants or exceed the screening levels established by the state or air quality management district?

- ✓ No, the project will not exceed *de minimis* or threshold emissions levels or screening levels.

Enter the estimate emission levels:

Ozone ppb (parts per million)

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

Yes, the project exceeds *de minimis* emissions levels or screening levels.

Screen Summary

Compliance Determination

According to <http://www.epa.gov/airquality/greenbk/ancl.html> and the EPA NEPAAssist tool accessed at <https://www.epa.gov/nepa/nepassist>, the subject property is located within a Non-attainment area for 8-Hour Ozone (2015 standard). The proposed project includes the new construction of a four (4) story building, 22-unit senior housing apartment complex. This project does not exceed *de minimis* emissions levels or the screening level established by the state or air quality

management district for the pollutant(s) identified above. Furthermore, based on a Conformity Determination letter between HUD and the Maryland Department of the Environment (MDE), any construction projects that are similar to or smaller in size than the Fairfield Ranch Commons and Race Street Apartments' case (500+ Units) in terms of duration, square footage and overall size, should not exceed the de minimis levels established by the state and therefore do not need to undergo a detailed conformity analysis. The proposed action is smaller than the Fairfield Ranch Commons and Race Street Apartments and no additional action appears warranted at this time. Lastly, development of a multi-family project will not result in emission levels of criteria pollutants, including de minimis levels since apartment project are not generally considered to be static source generators of air pollutants. The project is in compliance with the Clean Air Act.

Supporting documentation

[Maryland letter of Air Quality Conformity 2020 \(1\).pdf](#)

[Air Quality Emissions Calculations.pdf](#)

[Ozone Map.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Coastal Zone Management Act

General requirements	Legislation	Regulation
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.	Coastal Zone Management Act (16 USC 1451-1464), particularly section 307(c) and (d) (16 USC 1456(c) and (d))	15 CFR Part 930

1. Is the project located in, or does it affect, a Coastal Zone as defined in your state Coastal Management Plan?

Yes

No

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

According to the National Oceanic and Atmospheric Administration (NOAA) Office for Coastal Management (OCM) accessed at <https://coast.noaa.gov/czm/mystate/>, East Hartford is located within a planning area, however, it is not located within a Coastal Management Zone. Therefore, the proposed undertaking is in compliance with HUD's Coastal Zone Management Act regulations and no consultation nor mitigation measures are warranted. The project is in compliance with the Coastal Zone Management Act. The Coastal Zone Management PDF has been reviewed.

Supporting documentation

[Connecticut Coastal and Estuarine Map.pdf](#)

[Attachment 2 - CBRS Mapper\(1\).pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Contamination and Toxic Substances

General requirements	Legislation	Regulations
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.		24 CFR 58.5(i)(2) 24 CFR 50.3(i)

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

- Yes

3. Mitigation

Document and upload the mitigation needed according to the requirements of the appropriate federal, state, tribal, or local oversight agency. If the adverse environmental effects cannot be mitigated, then HUD assistance may not be used for the project at this site.

Can adverse environmental impacts be mitigated?

Adverse environmental impacts cannot feasibly be mitigated.

- ✓ Yes, adverse environmental impacts can be eliminated through mitigation.
Document and upload all mitigation requirements below.

4. Describe how compliance was achieved in the text box below. Include any of the following that apply: State Voluntary Clean-up Program, a No Further Action letter, use of engineering controls, or use of institutional controls.

Based on the Phase II analytical results there are several areas of fill material that contain concentrations of compounds below regulatory criteria. Unsuitable fill materials must be removed from the site and they must be properly managed in accordance with applicable regulations. Additionally, asphalt tailings should be managed/removed/reused to avoid cross contamination of clean material. Eagle Environmental anticipates the complete removal of contaminated soils will cost \$264,156. A closure report documenting the soil removal activities will be prepared. The report will include a description and mapping of the extent of the final removal areas, confirmation soil sampling locations and results, disposal characterization results, soil disposal documentation, re-use implementation, and all field methodologies utilized during the project.

If a remediation plan or clean-up program was necessary, which standard does it follow?

- ✓ Complete removal

Risk-based corrective action (RBCA)

Screen Summary

Compliance Determination

Site contamination was evaluated as follows: ASTM Phase I ESA, ASTM Phase II ESA, Remediation or clean-up plan, ASTM Vapor Encroachment Screening. On-site or nearby toxic, hazardous, or radioactive substances were found that could affect the health and safety of project occupants or conflict with the intended use of the property. Heating oil tanks served the previous onsite structures prior to gas conversion which may have resulted in releases to the environment due to tank failures and/or overfilling and due to the urban setting and site-wide demolition activities that occurred in the late 1960s

at 161 Francis Avenue and the late 2000s for the remaining three parcels, fill material may be present on the Site and could contain contaminant constituents. Additionally, several potential off-Site sources of contamination are located nearby and adjacent to the Site. The former Royal Typewriter Manufacturer at 150 New Park Avenue, the Capitol Foundry at Bartholomew and Hamilton Street and the M.S. Little Manufacturing Company at 151 Park Avenue operated since the early 1900s to approximately the 1950s. The former Royal Arco Service (now VEB Auto Sales) located at 125 New Park Avenue (approximately 60 feet west of the Site) is documented as a historical gasoline service station from at least 1969 to 1982 and also as an automotive repair facility until 2009. The adverse environmental impacts can be mitigated through the complete removal of contaminated soils. With mitigation, identified in the mitigation section of this review, the project will be in compliance with contamination and toxic substances requirements. Eagle Environmental recommends a closure report documenting the soil removal activities be prepared. The report will include a description and mapping of the extent of the final removal areas, confirmation soil sampling locations and results, disposal characterization results, soil disposal documentation, re-use implementation, and all field methodologies utilized during the project.

Supporting documentation

[New Park Ave_161 Francis Ave_8 Francis Ct Phase II ESA and Phase III Clean-up Plan \(Final\).pdf](#)
[New Park Avenue_161 Francis Avenue_8 Francis Court Hartford_Phase I ESA.pdf](#)
[Attachment 4 -Contaminat6ion and toxic substenes.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Endangered Species

General requirements	ESA Legislation	Regulations
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”).	The Endangered Species Act of 1973 (16 U.S.C. 1531 <i>et seq.</i>); particularly section 7 (16 USC 1536).	50 CFR Part 402

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

The HUD reviewer obtained an Official Species List for the subject property using the USFWS Information for Planning and Consultation (IPaC) website accessed at <https://ecos.fws.gov/ipac/>. According to the Official Species List, there are no federally-listed species located within the subject property boundaries. Therefore, the HUD reviewer has determined that the proposed project will have no effect on endangered species that may occur within the action area (subject property). In addition, the proposed project will have no effect on federally designated critical habitat. Therefore, the proposed undertaking will be in compliance with HUD's Endangered Species regulations and no consultation nor mitigation measures are required. This project is in compliance with the Endangered Species Act.

Supporting documentation

[IPAC Species List.pdf](#)

[Attachment 5b - FWS List.pdf](#)

[Attachment 5a - Endangered Species NDDDB.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Explosive and Flammable Hazards

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

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

Yes

3. Within 1 mile of the project site, are there any current or planned stationary aboveground storage containers that are covered by 24 CFR 51C? Containers that are NOT covered under the regulation include:

- Containers 100 gallons or less in capacity, containing common liquid industrial fuels OR

- Containers of liquefied petroleum gas (LPG) or propane with a water volume capacity of 1,000 gallons or less that meet the requirements of the 2017 or later version of National Fire Protection Association (NFPA) Code 58.

If all containers within the search area fit the above criteria, answer "No." For any other type of aboveground storage container within the search area that holds one of the flammable or explosive materials listed in Appendix I of 24 CFR part 51 subpart C, answer "Yes."

No

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

Yes

Screen Summary

Compliance Determination

There are no current or planned stationary aboveground storage containers of concern within 1 mile of the project site. The project is in compliance with explosive and flammable hazard requirements. The project does not include a hazardous facility. The project will increase residential density with 22 new units for elderly housing. There are no known current or planned stationary aboveground storage containers within 1-mile. The Connecticut Department of Energy and Environmental Protection does not currently maintain a list of aboveground storage tanks (ASTs) however, no ASTs were observed during the July 2019 Phase I ESA site reconnaissance. Refer to Attachment 9.

Supporting documentation

[EDR Report.pdf](#)

[Attachment 6 - Site and Surrounding Property ASTs.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Farmlands Protection

General requirements	Legislation	Regulation
The Farmland Protection Policy Act (FPPA) discourages federal activities that would convert farmland to nonagricultural purposes.	Farmland Protection Policy Act of 1981 (7 U.S.C. 4201 et seq.)	7 CFR Part 658

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

2. Does your project meet one of the following exemptions?

- Construction limited to on-farm structures needed for farm operations.
- Construction limited to new minor secondary (accessory) structures such as a garage or storage shed
- Project on land already in or committed to urban development or used for water storage. (7 CFR 658.2(a))

Yes

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

No

Screen Summary

Compliance Determination

According to the U.S. Census Bureau Urbanized Area Map, accessed at <http://tigerweb.geo.census.gov/tigerweb/>, the subject property is located within an urbanized area; therefore, the subject property is already in an area committed to urban development and is exempt from compliance with the Farmland Protection Policy Act per 7 CFR Part 658.2. The project is in compliance with HUD's Farmlands regulations and no mitigation is warranted. The project is in compliance with the Farmland Protection Policy Act.

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Hartford, CT

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Supporting documentation

[TigerWeb Map.pdf](#)
[Farmland.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Floodplain Management

General Requirements	Legislation	Regulation
Executive Order 11988, Floodplain Management, requires federal activities to avoid impacts to floodplains and to avoid direct and indirect support of floodplain development to the extent practicable.	Executive Order 11988	24 CFR 55

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:

[Attachment 3 - FEMA Flood map\(2\).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

According to FEMA Flood Insurance Rate Map (FIRM) #09003C-0364F, dated September 26, 2008, the subject property is located in Unshaded Zone X, designated as an area outside the 100 and 500-year flood zones and the flood potential for the subject property is minimal. According to the FEMA Flood Map Service Center accessed at <https://msc.fema.gov/portal/home>, there are no preliminary or pending FIRMs for the subject property. According to the National Flood Insurance Program (NFIP) Community Status Book accessed at <https://www.fema.gov/national-flood-insurance-program-community-status-book>, the subject property is located in Community ID #095080 which is a participating community in the NFIP. However, as no structures or insurable property are located within a Special Flood Hazard Area (100-year flood zone), flood insurance is not required under the NFIP. 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

[Attachment 3 - FEMA Flood map\(1\).pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Historic Preservation

General requirements	Legislation	Regulation
Regulations under Section 106 of the National Historic Preservation Act (NHPA) require a consultative process to identify historic properties, assess project impacts on them, and avoid, minimize, or mitigate adverse effects	Section 106 of the National Historic Preservation Act (16 U.S.C. 470f)	36 CFR 800 "Protection of Historic Properties" http://www.access.gpo.gov/nara/cfr/waisidx_10/36cfr800_10.html

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)

- ✓ Mashantucket Pequot Indian Tribe

Response Period Elapsed

- ✓ Mohegan Tribe of Indians of Connecticut Completed
- ✓ Narragansett Indian Tribe Completed

Other Consulting Parties

Describe the process of selecting consulting parties and initiating consultation here:

According to the HUD MAP Guide, applications for Firm Commitment, whether for new construction, rehabilitation, refinancing or conversion from non-residential to residential property, are considered federal undertakings which require HUD to make a determination of no effect, no adverse effect, or adverse effect upon historic properties. To assist HUD in making its historic preservation determination, a representative of the owner submitted a consultation request and project information to the appropriate State Historic Preservation Officer (SHPO). HUD is responsible for contacting the Tribal Historic Preservation Officer (THPO) of any affected tribes, as applicable.

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

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:**

The Sponsor is submitting this project under the HUD Section 202 Program, consisting of the new construction of one (1) four-story, 22-unit age restricted apartment complex. The Direct Area of Potential Effects (APE) includes the subject property and the surrounding Parkville Historic District.

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.

Address / Location / District	National Register Status	SHPO Concurrence	Sensitive Information
-------------------------------	--------------------------	------------------	-----------------------

Additional Notes:

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

Yes

✓ No

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

✓ Adverse Effect

**Document reason for finding; upload the criteria with summary and justification.
Criteria of Adverse Effect 36 CFR 800.5.**

Connecticut SHPO determined that the original building plans for the proposed project would not adhere to the design specifications of the surrounding Parkville Historic district. The sponsor modified the plans to better contextualize the new construction within the district, including changes in materials, fenestration, massing, and rhythm. While the new design partially minimizes the effect to the integrity of the district, the revised scope of work continues to constitute an adverse effect to historic resources.

Step 4 – Resolve Adverse Effects

Work with consulting parties to try to avoid, minimize or mitigate adverse effects. Refer to ATEC guidance and 36 CFR 800.6 and 800.7.

Were the Adverse Effects resolved?

✓ Yes

Describe the resolution of Adverse Effects, including consultation efforts and participation by the Advisory Council on Historic Preservation:

Following discussions with both the project architect and other stakeholders, the original design was modified to better contextualize the new construction within the district, including changes in materials, fenestration, massing, and rhythm. While the new design partially minimizes the effect to the integrity of the district, the revised scope of work continues to constitute an adverse effect to historic resources. **project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.**

**For
the**

As a condition to resolve the adverse effect, The Project Sponsor must allocate \$20,000 for use in the rehabilitation of historic properties within the city of Hartford, in concert with funding offered through the City's rehabilitation programs. All work shall be in a manner that meets the Secretary of the Interior's Standards for the Treatment of Historic Properties. Transfer of funds shall be completed before any site work begins.

Based on the response, the review is in compliance with this section. Document and upload the signed Memorandum of Agreement (MOA) or Standard Mitigation Measures Agreement (SMMA) below.

No

Screen Summary

Compliance Determination

A review of the National Register of Historic Places indicates that the subject property and the vicinity properties within the APE are not listed on the National Register of Historic Places; However the subject and surrounding vicinity is within the Parkville National Register Historic District (NR#15000112). To assist HUD in making its historic preservation determination, a representative of the owner submitted this finding and

project information to the appropriate State Historic Preservation Officer (SHPO). SHPO determined that the project was not compliant with the design specifications of the surrounding historic district and found that an adverse effect would result from the initial project designs. The original project designs have been modified in order to further mitigate the adverse impact to the historic district, however even with the changes, SHPO concluded that the revised scope of work continues to constitute an adverse effect to historic resources. In order to resolve the adverse effects, SHPO is requesting a condition of the project to include a requirement that the Project Sponsor must allocate \$20,000 for use in the rehabilitation of historic properties within the City of Hartford, in consort with funding offered through the City's rehabilitation programs. All work shall be in a manner that meets the Secretary of the Interior's Standards for the Treatment of Historic Properties. Transfer of funds shall be completed before any site work begins. The HUD reviewer attempted to contact three tribes which hold a historical interest in the subject area on October 28, 2020. A response was received from the Mohegan Tribe of Indians of Connecticut and the Narragansett Indian Tribe; each of which had no further concerns with the project as proposed. The two responding tribes requested that if and inadvertent discoveries are made during the construction process that they be contacted immediately. As of 07/16/2021, a response has yet to be received from the Mashantucket Pequot Indian Tribe. The project is in compliance with Section 106.

Supporting documentation

[SHPO Determination Letter \(2\).pdf](#)
[Section 106 Tribal Consultation Letter\(2\).pdf](#)
[Response Time Elapse.pdf](#)
[Email Sent\(2\).pdf](#)
[Section 106 Tribal Consultation Letter\(1\).pdf](#)
[Section 106 Concurrence Determination.pdf](#)
[Email Sent\(1\).pdf](#)
[Section 106 Tribal Consultation Letter.pdf](#)
[Section 106 Concurrence Email.pdf](#)
[Email Sent.pdf](#)
[TDAT.pdf](#)
[Attachment 7c - Hartford PA.pdf](#)
[Attachment 7b - Connecticut Historic Database.pdf](#)
[Attachment 7a-EPA Tribal areas.pdf](#)

Are formal compliance steps or mitigation required?

✓ Yes

No

Noise Abatement and Control

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

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: 63

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)

Screen Summary

Compliance Determination

The subject property is located within 1,000 feet of a major roadway, within 3,000 feet of a railroad and within 15 miles of a commercial or military airport. New Park Avenue, which is located along the western side of the Site approximately 50 feet from the western edge of the proposed Site building, is classified as a minor arterial roadway. The Hartford to New Haven CTRail/Amtrak rail line is located approximately 350 feet from the eastern edge of the proposed Site building. Railway assessment factors were developed using a combination of publically available rail schedules and rolling stock information from CTRail Hartford Line website and assumptions or suggested default noise assessment values/conditions. Hartford Brainard Airport (HFD) and Bradley International Airport (BDL) are located 2.9 miles east-southeast and 12 miles north of the Site, respectively. Pertinent data was entered into the HUD Airport Noise Worksheets for each airport, based on FAA operational data accessed as indicated in the worksheet instructions. A review of each airports noise contour mapping and approach directions revealed that there was no noise potential for noise contribution to the site. A Noise Assessment was conducted and the overall noise level of 63dB was found to be acceptable. See noise analysis. The project is in compliance with HUD's Noise regulation.

Supporting documentation

[Noise Assessment.pdf](#)

[Attachment 8 - Noise Abatement.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Sole Source Aquifers

General requirements	Legislation	Regulation
<p>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.</p>	<p>Safe Drinking Water Act of 1974 (42 U.S.C. 201, 300f et seq., and 21 U.S.C. 349)</p>	<p>40 CFR Part 149</p>

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

According to the Sole Source Aquifer layer obtained from EPA NEPAassist, accessed at <http://nepassisttool.epa.gov/nepassist/entry.aspx>, the subject property is not located within the boundaries of a Sole Source Aquifer. Therefore, the proposed undertaking

is in conformance with HUD's Sole Source Aquifer requirements and no consultation nor mitigation measures are warranted. The project is in compliance with Sole Source

Supporting documentation

[Attachment 9 - Sole Source Aquifers.pdf](#)

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

According to the USFWS National Wetlands Inventory Layer accessed at <http://nepassisttool.epa.gov/nepassist/entry.aspx> and visual observations, there are no wetland areas on the subject property. Therefore, the proposed undertaking will be in compliance with Executive Order (EO) 11990, Protection of Wetlands, as well as the requirements of Federal Register 24 CFR Parts 50, 55 and 58. The project is in compliance with Executive Order 11990.

Supporting documentation

[Attachment 10 - Wetlands.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Wild and Scenic Rivers Act

General requirements	Legislation	Regulation
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.	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))	36 CFR Part 297

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

According to the National Wild and Scenic Rivers website accessed at <https://www.rivers.gov/map.php>, there are no Wild and Scenic Rivers in the vicinity of the subject property. Therefore, the subject property is in conformance with HUDs Wild and Scenic Rivers regulations and no consultation nor mitigation measures are warranted. The project is in compliance with the Wild and Scenic Rivers Act.

Supporting documentation

- [Nationwide Rivers Inventory CT.pdf](#)
- [Connecticut Wild and Scenic Rivers.pdf](#)
- [Study River List.pdf](#)
- [Rivers.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Housing Requirements

General requirements	Legislation	Regulations
Many Housing Programs have additional requirements beyond those listed at 50.4. Some of these relate to compliance with 50.3(i) and others relate to site nuisances and hazards		24 CFR 50.3(i) 24 CFR 35

Hazardous Substances

Requirements for evaluating additional housing requirements vary by program. Refer to the appropriate guidance for the program area (i.e, the Multifamily Accelerated Processing (MAP) guide, Chapter 7 of the Healthcare Mortgage Insurance Handbook, etc.) for specific requirements.

Lead-based paint

Was a lead-based paint inspection or survey performed by the appropriate certified lead professional?

Yes

No, because the project was previously deemed to be lead free.

✓ No, because the project does not involve any buildings constructed prior to 1978.

No, because program guidance does not require testing for this type of project
For example: HUD's lead-based paint requirements at 24 CFR Part 35 do not apply to housing designated exclusively for the elderly or persons with disabilities, unless a child of less than 6 years of age resides or is expected to reside in such housing. In addition, the requirements do not apply to 0-bedroom dwelling units.

The property is currently an undeveloped gravel lot with no structures. Historically, one dwelling was located on each of the four parcels constructed in the early 1900s. The building and garage located at 161 Francis Avenue was demolished in the late 1960s and the remaining structures between 2008 and 2011. Each structure was presumed to contain lead-based paint and therefore called out as a Recognized Environmental Condition as part of the On-Site Fill Material in the 2019 Phase I ESA with potential impacts to on-Site soils from deterioration around the drip-lines.

Radon

Was radon testing performed following the appropriate and latest ANSI-AARST standard?

Yes

- ✓ No, because program guidance does not require testing for this type of project. Note that radon testing is encouraged for all HUD projects, even where it is not required. Explain why radon testing was not completed below.

The subject property is located in an EPA Radon Zone 3, designated as an area of high radon gas potential with an average indoor radon level above 4 picocuries per liter (pCi/L) of air. Radon mitigation measures are required to be implemented in the project design and construction in accordance with HUD guidelines. Mitigating potential radon contamination should be achieved by constructing the proposed structure(s) to meet all of the requirements of the ANSI/AARST CC-1000 2018 Soil Gas Control Systems in New Construction of Buildings (CC-1000 2018) standard or, if appropriate, the ANSI/AARST CCAH 2013 Reducing Radon in New Construction of One- & Two-Family Dwellings and Townhouses (CCA 2013) standard, for the installation of passive systems. If a passive system is included in the construction, an OM&M plan must be drafted and adhered to for the term of the HUD loan. Radon testing must be performed following construction activities and prior to Final Endorsement. Radon testing must be done in accordance with the protocols set by the American Association of Radon Scientists and Technologists, Protocol for Conducting Radon and Radon Decay Product Measurements in Multifamily Buildings (ANSI-AARST MAMF-2017). Testing must include 100% of ground floor units and 10% of upper floor units in all buildings included in the project. Occupation of the units will not be permitted until the results have been sent to HUD for review and acceptance that demonstrates radon levels are below 4.0 picocuries per liter (4.0 pCi/L).

Asbestos

Was a comprehensive asbestos building survey performed pursuant to the relevant requirements of the latest ASTM standard?

Yes

No, because the project does not involve any buildings constructed prior to 1978. Provide documentation of construction date(s) below.

- ✓ No, because program guidance does not require testing for this type of project Explain in textbox below.

The property is currently an undeveloped gravel lot with no structures. Residual ACM building debris was not identified during the 2019 Phase II ESI within the test pit or boring locations.

Additional Nuisances and Hazards

Many Housing Programs have additional requirements with respect to common nuisances and hazards. These include High Pressure Pipelines; Fall Hazards (High Voltage Transmission Lines and Support Structures); Oil or Gas Wells, Sour Gas Wells and Slush Pits; and Development planned on filled ground. There may also be additional regional or local requirements.

No additional nuisances and hazards have been identified or presumed to exist for the purposes of this project.

Mitigation

Describe all mitigation measures that will be taken for the Housing Requirements.

Radon - Radon mitigation measures are required to be implemented in the project design and construction in accordance with HUD guidelines. Mitigating potential radon contamination should be achieved by constructing the proposed structure(s) to meet all of the requirements of the ANSI/AARST CC-1000 2018 Soil Gas Control Systems in New Construction of Buildings (CC-1000 2018) standard or, if appropriate, the ANSI/AARST CCAH 2013 Reducing Radon in New Construction of One- & Two-Family Dwellings and Townhouses (CCAH 2013) standard, for the installation of passive systems. If a passive system is included in the construction, an OM&M plan must be drafted and adhered to for the term of the HUD loan. Radon testing must be performed following construction activities and prior to Final Endorsement. Radon testing must be done in accordance with the protocols set by the American Association of Radon Scientists and Technologists, Protocol for Conducting Radon and Radon Decay Product Measurements in Multifamily Buildings (ANSI-AARST MAMF-2017). Testing must include 100% of ground floor units and 10% of upper floor units in all buildings included in the project. Occupation of the units will not be permitted until the results have been sent to HUD for review and acceptance that demonstrates radon levels are below 4.0 picocuries per liter (4.0 pCi/L).

Screen Summary

Compliance Determination

See appendix for compliance with Housing Requirements.

Supporting documentation

[Radon Map.pdf](#)

[Attachment 12b EPAMapofRadonZonespdf.pdf](#)

[Attachment 12a - Site Map.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Environmental Justice

General requirements	Legislation	Regulation
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.	Executive Order 12898	

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

2. Were these adverse environmental impacts disproportionately high for low-income and/or minority communities?

- Yes

Explain:

The project area is located near minority and low-income census blocks, according to EPA Environmental Justice mapping. Identified impacts to on-site soil are common in Connecticut urban environments. The proposed project will not result in an adverse effect to minority and low-income populations, and will benefit residents of the project Site by adding needed affordable elderly housing and improving the area with new development.

Document and upload any supporting documentation below.

No

3. All adverse impacts should be mitigated. Explain in detail the exact measures that

must be implemented to mitigate for the impact or effect, including the timeline for implementation. This information will be automatically included in the Mitigation summary for the environmental review. If negative effects cannot be mitigated, cancel the project using the button at the bottom of this screen.

✓ Mitigation as follows will be implemented:

Contaminated soils will be completely removed from the site and asphalt tailings will be managed/removed/reused to avoid cross contamination of clean material, as part of the Risk Based Corrective Action Plan highlighted in the Phase III prepared by Eagle Environmental.

No mitigation is necessary.

4. Describe how the affected low-income or minority community was engaged or meaningfully involved in the decision on what mitigation actions, if any, will be taken.

Public notice was not required for on site remediation. As the remediation is self implementing under the CTDEEP Remediation Standard Regulations, there are no environmental regulatory agency coordination or approvals required.

Screen Summary

Compliance Determination

The immediately surrounding properties consist of primarily residential use, with beneficial commercial developments to the south and west of the subject and industrial uses to the east. Industrial sections are separated from the subject site via a CT Fastrack Bus Lane, which acts as a man made barrier separating industrial activities from the rest of the subject neighborhood. These land uses are not expected to have a detrimental environmental impact to the subject property. Adverse environmental impacts that are disproportionately high for low-income and/or minority communities were identified on the subject site. With mitigation, identified in the mitigation section of this review, the project will be in compliance with Executive Order 12898.

Supporting documentation

[Percentage Below Poverty Line Map.pdf](#)
[Attachment 11 - EJ Screen.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No