



**U.S. Department of Housing and Urban  
Development**

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

### **Project Information**

**Project Name:** Choice Neighborhoods NSD Programs Focus Area A Revitalization Project

**Responsible Entity:** City of Phoenix, 200 W Washington St Phoenix AZ, 85003

**Grant Recipient** (if different than Responsible Entity):

**State/Local Identifier:**

**Preparer:** Melinda Jones, Archaeological Consulting Services, Ltd.

**Certifying Officer Name and Title:** Spencer Self, Neighborhood Services Director /  
Cindy Stotler, Housing Director

**Grant Recipient** (if different than Responsible Entity):

**Consultant** (if applicable): Melinda G. Jones, Archaeological Consulting Services, Ltd. (ACS)

**Direct Comments to:** André D. Best, Neighborhood Services Environmental Quality Specialist /  
Olga Soto, Neighborhood Services CN Project Manager

**Project Location:**

The Choice Neighborhoods (CN) NSD Programs Focus Area A is located within the City of Phoenix’s (City’s) overall 0.6-square-mile CN program area and is the first geographically based phase of a four-phase, multi-year effort within program area. The Focus Area A project area is bounded by North 16th Street on the west, North 17th Street on the east, the alley south of Adams Street on the south, and the alley north of Monroe Street on the north, in Phoenix, Maricopa County, Arizona. The project area is approximately 10.6 acres in size. Project maps included in ERR 1.

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

The City of Phoenix proposes to invest U.S. Department of Housing and Urban Development (HUD) funds on a strategic neighborhood revitalization effort. Project activities involve: major rehabilitation of single- and multi-family residential units; reconstruction of homes; residential-based lead abatement; acquisition of vacant lots or blighted residential properties containing structures/homes; new residential construction; relocation assistance; demolition of existing residential structures; site excavation; installation of concrete for residential-based foundations, sidewalks and parking lots; installation of asphalt driveways; American with Disabilities Act (ADA) modifications, where necessary; installation of associated residential-based infrastructure (sewer, water, gas); landscape improvements including planting of trees and shrubbery; and, disposition of development-ready vacant properties.

The CN NSD Programs Focus Area A Revitalization Project is expected to use HUD Community Development Block Grant, Choice Neighborhoods, and HOME Investment Partnership Program funds with an estimated total investment of \$1,000,000 of HUD funds starting from the 2019/2020 federal fiscal funding year. The project will also involve federal funds from future federal funding years. NSD’s overall investment throughout the CN Program grant term ending in 2024, as part of this four-phase, multi-year revitalization effect is estimated at \$4,250,000.

Federally funded CN-based activities over a five-year period include the following:

- **Rental Rehabilitation Program (Rental)**
  - includes possible major and/or minor rehabilitation of up to 55 substandard rental housing structures contributing to an unsafe living environment or community blight.
- **HOME Comprehensive Housing Repair Program (HOMECHRP)**
  - includes possible major rehabilitation and reconstruction of up to 5 substandard owner-occupied housing structures contributing to an unsafe living environment or community blight.
- **Hardship Assistance Program (HAP)**
  - includes minor rehabilitation and/or demolition of blighted secondary stand-alone structures (i.e. garages/sheds) of up to 20 owner-occupied housing structures, to correct code violations.
- **NSD Demolition Program**
  - includes demolition of up to two (2) substandard residential structures which are not suitable for rehabilitation and are contributing to community blight and/or posing an ongoing threat to public safety.

- **Infill Open Application and Slum and Blight Acquisition Programs**
  - includes acquisition and/or demolition (in preparation for infill housing) of up to two (2) lots that are vacant or have residential structures on them, to be used for public or privately funded infill housing.
  - includes construction of up to two (2) housing units on vacant lots by special sub-recipients or non-federally funded private developers.

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

The CN Program is designed to support locally driven solutions for transforming distressed neighborhoods, using place-based strategies to address the interconnected challenges of poor-quality housing, access to quality educational programs, poor health, high crime, and lack of capital. Focus Area A is one of four geographically based critical focus areas within the Edison-Eastlake Community (EEC) identified to target the strategic CN-based revitalization program.

Focus Area A was initially identified as a focus area in part by visual needs assessments of 41 residential properties with blighted exterior façade conditions. A subsequent assessment conducted in September 2019 identified 86 substandard properties that were categorized as requiring assistance. From these assessments, NSD documented needed exterior improvements, such as roof replacement and repairs, removal of peeling paint and repainting, removal of rotted wood patios and carports, and front yard landscaping. Additionally, there are substandard owner-occupied housing structures, vacant lots, and blighted secondary stand-alone structures with code violation within the project area.

The current conditions of the neighborhood contribute to an unsafe living environment and community blight. The proposed federally funded CN-based revitalization activities proposed within Focus Area A will improve the neighborhood aesthetics, improve occupant and public safety, encourage new residents, businesses, and investors to move into the neighborhood, and promote walking and biking. Furthermore, these activities would remove existing physical, social, and economic barriers that currently isolate the residents and would increase the desirability of the project area as a place to live, work and visit.

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

The existing neighborhood is in a modern urban setting and consists of single-family and multifamily residences, many of which are neglected and in poor condition, commercial properties, and vacant lots. Generally, trees, shrubs and other vegetation are unkept. Residential structures have peeling paint, deteriorating roofs, unsound fences and some contain lead which is detrimental to the development of children under the age of five. Few properties have been modified to be accessible, and none fully comply with ADA requirements. Areas with ADA access and/or uneven surfaces are difficult for persons in wheelchairs to navigate and force people into the road. Crime is expected to continue to within the neighborhood due to the existing current economic, social and physical conditions. Focus Area A is bordered to the east by the Sidney P. Osborn public housing site, commercial/retail properties to the south, residential properties to the west, and commercial/retail properties to the north.

The City of Phoenix was awarded a \$1.5 million CN Planning and Action Grant in June 2016 to create a comprehensive neighborhood transformation plan for the ECC to serve as the blueprint for the CN Implementation Grant Program and identify critical community improvement projects in the EEC target area. The City of Phoenix, the residents, and the stakeholders of the EEC are

fully committed to bringing the transformation plan, known as the One Vision Plan (OVP), to reality. The OVP outlines the community's priorities that were generated through extensive community engagement, research and visioning with residents, key stakeholders and the broader community:

- *Connect us to our community and to each other* – eliminate the physical, social and economic barriers that have isolated the EEC from the rest of Phoenix as well as residents from each other within the community;
- *Embrace where we have been, where we are, and where we are going* – recognize the very real challenges facing the EEC, but also recognize its inherent strengths and assets;
- *Lift-up each and every one of us* – create a network of services and amenities that values the whole individual and families and empowers the entire community.

The OVP is a comprehensive approach that supports the transformation of the EEC into a vibrant and active neighborhood for all who live in the community. The plan's focus on making sustainable improvements to the existing housing stock not only improves the health and safety of its occupants but complements the scheduled revitalization efforts planned for the public housing, neighborhood infrastructure, mobility enhancements, and business façade improvements.

Grounded in supporting the OVP's priorities, the CN Critical Community Improvements (CCI) Plan focuses on the following components: 1) Park Improvements and Expansion; 2) Neighborhood Beautification; 3) Mobility Enhancements; 4) and Neighborhood Amenities. These activities capitalize on existing neighborhood assets and programs and the future development of 1,011 new housing units. Additionally, they will serve as catalysts to enhance the physical, social, and economic improvements needed in the EEC.

The CCI Plan leverages already committed neighborhood investments with additional activities to benefit the new housing as well as current and future residents and stakeholders. Approximately \$4.5 million in CCI funds will be leveraged with \$8.151 million in other funding to improve existing and create new usable open spaces, boost neighborhood connectivity, enhance existing neighborhood housing stock, support local businesses, improve pedestrian mobility and safety, develop a new Family Education Center and close the digital divide. The CCI-funded activities are a part of a broader, more comprehensive neighborhood improvement program so some of these activities will be funded from other non-CN sources.

Ultimately, the completion of the CCI-funded activities along with the other neighborhood investments will further move the community closer to its preferred future vision: "Edison-Eastlake is a diverse and thriving in-town neighborhood rich with history that offers exceptional access to downtown, high quality homes, healthy living and excellent connections to jobs, schools and services." Furthermore, the proposed physical improvements described in the CCI plan will positively impact the quality of life for the residents of the EEC and its visitors. These activities are critical investments to support the overall success as the community and will serve as catalyst for other community improvements.

The CN-funded programs that would significantly improve and remove deficiencies in the EEC target area include:

- Owner-Occupied Housing Rehabilitation Program (OOHR)
- Extended Rehab Program (XRP)

- Hardship Assistance Program (HAP)
- Rental Rehabilitation Program (Rental)
- HOME Housing Rehabilitation and Reconstruction
- Comprehensive Housing Repair Program (CHRP)
- NSD Demolition Program (NSD Demo)
- Slum and Blight Acquisition Program
- Infill Open Application Program
- Weatherization Assistance Program (WAP)
- Lead Hazard Control Program (LEAD)
- Healthy Homes Program

Some homes in the CN were built prior to 1978 and as far back as the 1950s. Residential as well as multi-family units are suspected to contain lead, a harmful substance that can affect children's growth and cognitive abilities. Most homes have deteriorating roofs and other visible disrepair. A whole-house assessment will be conducted on eligible properties prior to program implementation.

### **Funding Information**

| <b>CN Programs Requiring Focus Area Environmental Review</b>            |                |                     |                    |              |
|---|----------------|---------------------|--------------------|--------------|
| <b>Program</b>  | <b>Funding</b> | <b>Funding Year</b> | <b>Budget</b>      | <b>Units</b> |
| HAP   | CDBG           | 2020/2021           | \$100,000          | 20           |
| HOMECHRP  | HOME           | 2020/2021           | \$300,000          | 5            |
| Rental  | CDBG           | 2020/2021           | \$850,000          | 35           |
| Rental  | CN             | 2020/2021           | \$550,000          | 20           |
| NSD Demo  | CDBG           | 2020/2021           | \$250,000          | 2            |
| Infill  | CDBG           | 2020/2021           | \$250,000          | 2            |
| Slum/Blight Acquisition   | CDBG           | 2020/2021           | \$250,000          | 2            |
| <b>CN Programs Total</b>  |                |                     | <b>\$2,550,000</b> | <b>86</b>    |
| <b>NSD Programs Undergoing Separate (Citywide) Environmental Review</b> |                |                     |                    |              |
| <b>Program</b>  | <b>Funding</b> | <b>Funding Year</b> | <b>Budget</b>      | <b>Units</b> |
| OOHR/XRP  | CDBG           | 2019/2020           | \$750,000          | 40           |
| WAP   | WAP/URRD       | 2019/2020           | \$500,000          | 25           |
| LEAD  | LHCP           | 2019/2020           | \$350,000          | 30           |
| <b>NSD Programs Total</b>   |                |                     | <b>\$1,600,000</b> | <b>95</b>    |
| <b>Focus Area A CN/NSD Programs Total</b>                               |                |                     | <b>\$4,150,000</b> | <b>181</b>   |

**Estimated Total HUD Funded Amount:** \$2,550,000

**Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]:** \$4,150,000

### **Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities**

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where

applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

| <b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6   | Are formal compliance steps or mitigation required?                       | Compliance determinations   |
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| <b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6</b>   |   |   |
| <b>Airport Hazards</b><br><br>24 CFR Part 51 Subpart D  | Yes    No<br><input type="checkbox"/> <input checked="" type="checkbox"/> | <u>Source(s):</u> EPA NEPAAssist - Airport layer screenshots dated 2/10/20 (ERR 2)<br><br><u>Finding:</u> The project site is not within 2,500 feet of a civilian airport. Additionally, the project site is not within 15,000 feet of a military airport, only a civilian airport (Sky Harbor).<br><br><u>Determination:</u> The project is in compliance with Airport Hazards requirements.             |
| <b>Coastal Barrier Resources</b><br><br>Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]          | Yes    No<br><input type="checkbox"/> <input checked="" type="checkbox"/> | <u>Source(s):</u> NationalAtlas.gov General Reference Map of the United States PDF file dated 7.2019 (ERR 3).<br><br><u>Finding:</u> The project site is located in a state (Arizona) that does not contain CBRS units.<br><br><u>Determination:</u> This project is in compliance with the Coastal Barrier Resources Act.  |
| <b>Flood Insurance</b><br><br>Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a] | Yes    No<br><input type="checkbox"/> <input checked="" type="checkbox"/> | <u>Source(s):</u> FEMA FIRMette - FIRM04013C2210L dated 10/16/2013 (ERR 4).<br><br><u>Finding:</u> Project area is located in Zone X (shaded). The project location is not in a FEMA-designated Special Flood Hazard Area. The project does not require flood insurance or is exempted from flood insurance.<br><br><u>Determination:</u> The project is in compliance with Flood Insurance requirements. |
| <b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 &amp; 58.5</b>   |   |   |

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| <p><b>Clean Air</b></p> <p>Clean Air Act, as amended, particularly section 176(c) &amp; (d); 40 CFR Parts 6, 51, 93</p> | <p>Yes    No</p> <p><input checked="" type="checkbox"/>    <input type="checkbox"/></p> | <p><u>Source(s)</u>: Project description (ERR 1). EPA Non-Attainment Counties for All Criteria Pollutants printed 6/11/2020; City of Phoenix Air Quality Assessment for HUD-Funded Program Activities form signed 1/24/2020; email from Matthew Potzler, Environmental Air Quality and Climate Specialist, dated 1/27/2020; email from NSD Environmental Review Officer (ERO), dated 6/22/2020 (ERR 5).</p> <p><u>Finding</u>: Project is a developed area located in a Non-Attainment Area for PM 10 and 8-hour ozone. Project activities involving ground disturbance of greater than 1/10 acre will require a dust control permit.</p> <p>Some homes in the CN were built prior to 1978 and as far back as the 1950s. Residential as well as multi-family units are suspected to contain lead and asbestos.</p> <p><u>Determination</u>: Dust control permit is required for earthmoving activities on areas greater than 1/10 acre. If dust control permit is required, consult Maricopa County Department of Air Quality. Since environment is not being fundamentally changed (i.e., rehabbing an already developed area) and project activities are below the de minimis requirements, a general conformity determination is not required.</p> <p>Compliance with the National Emission Standards for Hazardous Air Pollutants (NESHAP) will be evaluated on a project-specific basis as part of Tier 2 Environmental Review. The City of Phoenix HUD-Funded Project NESHAP Compliance / Asbestos Assessment Form shall be completed as a mitigative requirement for project activities involving multi-family/multi-structure rehabilitations and demolition of stand-alone single-/multi-family residential structures. The action triggers and required compliance documents are referenced on the form.</p> <p>As required by the Clean Air Act, project activities shall require a permit for the removal and disposal of Regulated Asbestos Containing Materials (RACM), prior to the disturbance of any RACM. Contact with/disturbance of ACM/RACM by OSHA-trained personnel only. Asbestos-related permits required, as applicable. Copy of</p> |
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|   |  | <p>obtained Maricopa County NESHAP permit to be emailed to NSD's ERO.</p>   |
| <p><b>Coastal Zone Management</b><br/><br/>Coastal Zone Management Act, sections 307(c) &amp; (d)</p> | <p>Yes No<br/><input type="checkbox"/> <input checked="" type="checkbox"/></p> | <p><u>Source(s)</u>: NationalAtlas.gov General Reference Map of the United States PDF file dated 7.2019 (ERR 3).<br/><br/><u>Finding</u>: This project is located in a state (Arizona) that does not participate in the Coastal Zone Management Program.<br/><br/><u>Determination</u>: This project is in compliance with the Coastal Zone Management Act.</p>   |
| <p><b>Contamination and Toxic Substances</b><br/><br/>24 CFR Part 50.3(i) &amp; 58.5(i)(2)</p>        | <p>Yes No<br/><input checked="" type="checkbox"/> <input type="checkbox"/></p> | <p><u>Source(s)</u>: EPA (NEPAssist) / ADEQ web-based printouts; email from NSD ERO, dated 2/13/2020; <i>Modified Phase I Environmental Site Assessment for Choice Neighborhoods NSD Programs Focus Area A Revitalization Project</i> (ACS 2020) (ERR 6). Area site visit on 2/3/2020.<br/><br/><u>Finding</u>: The project area is located within the Motorola 52<sup>nd</sup> Street National Priority List (NPL) Superfund Site boundary. The NPL site consists of a large area of localized soil contamination and a contaminated groundwater plume that generally extends west from the former Motorola facility. The NPL site consists of three operable units (OUs) and the project area is located within OU3. Although current investigations indicated soil vapor intrusion is not a concern within the OU3, investigations are still ongoing. (see Other Factors – Vapor Intrusion)<br/><br/>Two auto body shops are located within the project area at the Adams and North 16<sup>th</sup> streets intersection: an unnamed facility and Ernesto's Auto Body and Paint. Although there is no regulatory listing associated with the unnamed facility and no violations associated with Ernesto's Auto Body, these facilities often use and store hazardous materials; therefore, there is a potential for toxics and contaminants associated with these facilities.<br/><br/>No other nearby facilities or USTs are of concern due to the nature of the facility and/or distance from the project area.<br/><br/>Radon, a potential indoor air contaminant, in Maricopa County has been documented at 1.2 picocuries per liter (pCi/L), which is below the EPA action level of 4 pCi/L.</p> |



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|   |   | <p><u>Determination:</u> Site-specific activities shall be reviewed for nearby facility hazards. Additionally, if unanticipated hazardous materials are encountered during site-specific project activities, the following requirements apply:</p> <ul style="list-style-type: none"> <li>– Unanticipated hazardous materials encountered during construction shall be handled and removed in compliance with applicable federal, state, and local laws.</li> <li>– Appropriate federal, state, and local authorities shall be notified immediately of any hazardous materials releases during construction activities and corrective actions shall be taken to minimize any release impacts.</li> </ul> <p>While it is unlikely radon will present a concern for closed air structures within the project area, site-specific testing is required for non-emergency rehabilitation activities on existing residences to determine its presence and to fully assess the potential risk to occupants and necessary mitigation. Radon-resistant construction is required for new residential construction and other site-specific activities involving ‘new air space’ in a residence, when commensurate with testing outcome and the project rehab type.</p> |
| <p><b>Endangered Species</b></p> <p>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p> | <p>Yes    No</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p> | <p><u>Source(s):</u> U.S. Fish and Wildlife Service (USFWS) Information, Planning and Consultation (IPaC) System printout dated 1/31/2020; Arizona Game and Fish Department (AGFD) Arizona Online Environmental Review Tool HGIS-09625 printed 1/31/2020; email from Tricia Balluff, Environmental Programs Coordinator, dated 2/24/2020 (ERR 7). Area site visit on 2/3/2020.</p> <p><u>Finding:</u> The USFWS IPAC system identified four threatened or endangered species with the potential to be in the project area: Sonoran pronghorn (experimental, non-essential population), California least tern, yellow-billed cuckoo, and Yuma clapper rail. No critical habitat is present. No suitable habitat is present in the analysis area for use by any of these species. There is no native desert or wash corridors and no marsh, wetland, or riparian vegetation present.</p> <p><u>Determination:</u> This project will have No Effect on listed species because there are no</p>   |

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|  |   | <p>listed species or designated critical habitats in the project area. This project is in compliance with the Endangered Species Act.</p>  |
| <p><b>Explosive and Flammable Hazards</b></p> <p>24 CFR Part 51 Subpart C</p>  | <p>Yes    No<br/> <input type="checkbox"/>    <input checked="" type="checkbox"/></p> | <p><u>Source(s)</u>: Project description (ERR 1). Google Earth / Maps screenshots printed 2/13/2020; email from NSD ERO dated 5/29/2020 (ERR 8). Site visit on 2/3/2020.</p> <p><u>Finding</u>: There are eight facilities with aboveground storage tanks (AGSTs) within 1 mile of the project area, including the groundwater treatment facility on the northwest corner of Washington Avenue and North 20<sup>th</sup> Street, former St. Luke’s Medical Center, Chemical Transportation Inc., Honeywell Aerospace Global Headquarters, Union Pacific, Frontier Transportation, Inc., Fuels, LLC, and Short Equipment, Inc. All of the AGSTs containing materials of concern are located well outside the acceptable separation distance (ASD) given their distance to the project area.</p> <p><u>Determination</u>: Project activities involve revitalization of an existing neighborhood, including infill housing development on vacant lots. These activities will increase residential density. None of the AGSTs identified within a 1-mile radius are a concern due to exceeding ASD from the project area. Project is in compliance with explosive and flammable hazard requirements.</p> |
| <p><b>Farmlands Protection</b></p> <p>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p> | <p>Yes    No<br/> <input type="checkbox"/>    <input checked="" type="checkbox"/></p> | <p><u>Source(s)</u>: Project description (ERR 1). Natural Resource Conservation Service (NRCS) Web Soil Survey (WSS) Farmland Classification printout dated 6/13/2020 (ERR 9). Area site visit on 2/3/2020.</p> <p><u>Finding</u>: The project area is 16% Avondale Clay Loam and 84% Glenbar Clay Loam. These soils are considered prime farmland if irrigated and either protected from flooding or not frequently flooded during the growing season. The project SOW (neighborhood revitalization of an existing urban core neighborhood) does not include any activities that could potentially convert agricultural land to a non-agricultural use.</p> <p><u>Determination</u>: The project is in compliance with the Farmland Protection Policy Act.</p>  |

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| <p><b>Floodplain Management</b></p> <p>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>                               | <p>Yes No<br/> <input type="checkbox"/> <input checked="" type="checkbox"/></p> | <p><u>Source(s)</u>: Project description (ERR 1). FEMA FIRMette - FIRM04013C2210L dated 10/16/2013 (ERR 4).</p> <p><u>Finding</u>: Project located in 500-year floodplain - Zone X (shaded). However, based on the project description this project is not a critical action, so an 8-Step process is not required.</p> <p><u>Determination</u>: The project is in compliance with Executive Order 11988.</p>  |
| <p><b>Historic Preservation</b></p> <p>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p> | <p>Yes No<br/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> | <p><u>Source(s)</u>: City/SHPO/ACHP Programmatic Agreement signed 4/30/2007. City Section 106 Historic/Archaeological Review form dated 2/6/20 (CHPO) and 1/28/2020 (CAO); <i>Focus Area A Historic-age Residential Property Inventories</i> (Murray 2019); <i>Archaeological Treatment Plan Addendum for Neighborhood Services Department in Focus Areas in the Edison-Eastlake Community Project, Phoenix</i> (Herr 2019). (ERR 10).</p> <p><u>Finding</u>: There are no historic properties within the project area. A portion of the project area falls within the 250-ft site buffer for AZ T:12:1 (ASM) (La Ciudad), a large prehistoric village with human remains. A prehistoric canal also crosses the project area.</p> <p><u>Determination</u>: All residential properties within the project area have been evaluated for NRHP-eligibility and recommended not individually eligible due to lack of significance and/or integrity. It is also recommended that the residential properties in the project area are not part of an NRHP-eligible historic district.</p> <p>Archaeological treatment shall follow recommendations presented in the <i>Archaeological Treatment Plan Addendum for Neighborhood Services Department in Focus Areas in the Edison-Eastlake Community Project, Phoenix</i> (Herr 2019). Archaeological monitoring and/or phased data recovery requirements are dependent on the type of proposed action in these areas and will be evaluated on a site-specific (Tier-2) basis.</p> |
| <p><b>Noise Abatement and Control</b></p> <p>Noise Control Act of 1972, as amended by the Quiet</p>                                       | <p>Yes No<br/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> | <p><u>Source(s)</u>: Focus Area A Noise Impact Area Map; NEPAssist road-railroad-screenshots; Sky Harbor International Airport Noise Exposure Map Update, 6/9/2014; Scottsdale Airport Noise and Traffic Map, 10/18/2001;</p>  |

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| <p>Communities Act of 1978; 24 CFR Part 51 Subpart B</p>   |   | <p>Stellar Airpark Noise Contours Map, 9/2012; HUD Exchange Day/Night Level (DNL) calculator printouts (ERR 11).</p> <p><u>Finding:</u> Project area is within 1,000 feet of several major roadways and 3,000 feet of railroads. Project area is located well outside the 60 dB noise contours for nearest public airports within 15 miles. Based on the DNL calculations, some parcels along East Adams Street (on both north and south sides of roadway) have a combined DNL for all road and rail sources, including airports, above 65 decibels (dB). Noise levels above 65 dB but not exceeding 75 dB are in HUD’s “normally unacceptable” range. Based on the DNL calculations, noise levels in the project area range from 63 to 67 dB.</p> <p><u>Determination:</u> Project activities involving new construction, major rehabilitation, and modernization and occurring within Focus Area A Noise Impact Area require site-specific noise analysis as part of Tier 2 Environmental Review. If within site-specific Noise Impact Area implement mitigations defined through site-specific noise assessment and project scope of work.</p> |
| <p><b>Sole Source Aquifers</b></p> <p>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p> | <p>Yes    No<br/> <input type="checkbox"/>    <input checked="" type="checkbox"/></p> | <p><u>Source(s):</u> Project location aerial map (ERR 1). EPA Region 9 - Groundwater - Sole Source Aquifer PDF file dated 7.2019 (ERR 12).</p> <p><u>Finding:</u> No sole source aquifers exist in Maricopa County. The project is located more than 60 miles from a sole source aquifer area.</p> <p><u>Determination:</u> The project is in compliance with Sole Source Aquifer requirements.</p>   |
| <p><b>Wetlands Protection</b></p> <p>Executive Order 11990, particularly sections 2 and 5</p>  | <p>Yes    No<br/> <input type="checkbox"/>    <input checked="" type="checkbox"/></p> | <p><u>Source(s):</u> Project Description (ERR 1). Email from Tricia Balluff, Environmental Programs Coordinator, dated 2/24/2020 (ERR 7). USFWS National Wetland Inventory map printout dated 2/15/2020 (ERR 13). Area site visit on 2/3/2020.</p> <p><u>Finding:</u> No potential Waters of the U.S. or wetlands are present in the project area.</p> <p><u>Determination:</u> Based on project location a Clean Water Act permit or Section 401 certification is not required/triggered. The project is in compliance with Executive Order 11990.</p>   |

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| <p><b>Wild and Scenic Rivers</b></p> <p>Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p> | <p>Yes    No</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p> | <p><u>Source(s)</u>: National Wild and Scenic Rivers Map of Arizona dated 07.2019 (ERR 14).</p> <p><u>Finding</u>: This project is located more than 40 miles south of the nearest Arizona NWSRS river.</p> <p><u>Determination</u>: The project is in compliance with the Wild and Scenic Rivers Act.</p>  |
| <p><b>ENVIRONMENTAL JUSTICE</b></p>   |   |   |
| <p><b>Environmental Justice</b></p> <p>Executive Order 12898</p>  | <p>Yes    No</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p> | <p><u>Source(s)</u>: Project description (ERR 1). EPA EJSCREEN printouts dated 06/13/2020; Mitigation Measures Environmental Justice Evaluation Matrix (ERR 15).</p> <p><u>Finding</u>: Project area is located in Census Block Group 040131139001. This Block Group includes approximately 1,040 people, of whom 85% are minority population (87 percentile in AZ, 87 percentile in US) and 85% are low income (98 percentile in AZ, 98 percentile in US).</p> <p>Project will not result in major adverse impacts to the quality of the human environment or result in noncompliance with related laws and authorities. Specifically, any Tier-1 ‘potential adverse impact’ that cannot be mitigated in Tier-2 analysis will not be approved on a site-specific Tier-2 basis. Project will result in sustainable improvements on several factors, including housing stock, aesthetics, public safety, neighborhood connectivity, and pedestrian mobility. These improvements will have a major long-term beneficial impact on the neighborhood’s residences and business owners.</p> <p>Although the majority of the population in the project area is either minority and/or low income, potential adverse environmental impacts will be mitigated through strict conformance with the prescribed mitigation measures. Therefore, the project would not result in disproportionate high and adverse human health or environmental effects on minority and low-income population.</p> <p><u>Determination</u>: The project is in compliance with Executive Order 12898.</p> |

**Environmental Assessment Factors** [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and

resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. **All conditions, attenuation or mitigation measures have been clearly identified.**

**Impact Codes:** Use an impact code from the following list 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   |
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| <b>LAND DEVELOPMENT</b>  |             |   |
| Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design | 3           | <p><u>Source(s)</u>: Email from Sarah Stockham, Village Planner, dated 1/31/2020 (ERR 16). 2015 Phoenix General Plan (<a href="https://www.phoenix.gov/pdd/planning-zoning/phoenix-general-plan">https://www.phoenix.gov/pdd/planning-zoning/phoenix-general-plan</a>). City of Phoenix General Plan Land use Map (<a href="https://www.phoenix.gov/pddsites/Documents/PZ/pdd_pz_pdf_00174.pdf">https://www.phoenix.gov/pddsites/Documents/PZ/pdd_pz_pdf_00174.pdf</a>). Transit Oriented Development (TOD) Strategic Policy Framework (<a href="https://www.phoenix.gov/villagesite/Documents/pdd_pz_pdf_00380.pdf">https://www.phoenix.gov/villagesite/Documents/pdd_pz_pdf_00380.pdf</a>). Eastlake-Garfield TOD Policy Plan (<a href="https://www.phoenix.gov/pddsites/Documents/Five%20Year%20Action%20Plan%20EG.pdf">https://www.phoenix.gov/pddsites/Documents/Five%20Year%20Action%20Plan%20EG.pdf</a>). Phoenix City Code Sec. 23-14(h) (<a href="https://phoenix.municipal.codes/CC/23-14">https://phoenix.municipal.codes/CC/23-14</a>).</p> <p><u>Finding</u>: The project area is comprised of several zoning classifications, including G-3 General Commercial; C-2 Intermediate Commercial; Special Permit; P-1 Passenger Automobile Parking, Limited; and R-5 RI, Multifamily Residence District, Residential Infill District. Existing land uses in the project area include a surface parking lot with mobile vending, two auto body repair shops, a church, single-family residences, and multifamily residences. Land uses on adjacent properties include several restaurants to north, multi-family public housing to the east, commercial facilities such as a laundromat, auto sales and body repair, a lighting store, a restaurant, and surface parking lot. The proposed rehabilitation of existing residences and construction of new residences is compatible with zoning and surrounding land uses.</p> <p>Project area is located in the Eastlake-Garfield TOD District and is designated as an area for redevelopment and maintained housing. Project activities are consistent with the Eastlake-</p> |

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|   |          | <p>Garfield TOD Policy Plan and the Phoenix General Plan’s goals and policies. Redevelopment of vacant lots in the project area with residential uses is consistent with the character of the area. Rehabilitation and reconstruction of existing residential structures is sensitive to the existing scale and character of the area.</p> <p>Rehabilitation and reconstruction of substandard residential structures contributing to an unsafe living environment or community blight will have a beneficial effect on the residential properties in the project area. Conversion of vacant and underutilized parcels into infill housing will be benefit the community and its residents, local businesses, and stakeholders. Furthermore, construction of sidewalks, ADA improvements, and landscaping will enhance pedestrian environment and improve street-level activity.</p> <p><u>Determination:</u> New structures shall conform to the height of existing one-story single-family and multifamily residences and up to two-story commercial uses and the design and construction of decks and patios should be sensitive to potential privacy concerns for adjacent single-story structures.</p>   |
| <p>Soil Suitability/<br/>Slope/ Erosion/<br/>Drainage/ Storm<br/>Water Runoff</p> | <p>3</p> | <p><u>Source(s):</u> Project description (ERR 1). NRCS WSS printouts; emails from James Marshall, Environmental Programs Coordinator, dated 6/16/2020 and 6/30/2020; email from Matthew Miles, Civil Engineer III, dated 6/17/2020 (ERR 17). Area site visit on 2/3/2020.</p> <p><u>Finding:</u> Project area is located in an urban setting with commercial and residential properties. The area is relatively flat with no natural drainages or swales. There are no catch basins adjacent to the project area. There is no visual evidence of ground subsidence, soil problems or filled ground in the project area.</p> <p>Soils in the project are include Avondale clay loam (approximately 17%) and Glenbar clay loam, 0 to 2 percent slopes (approximately 83%). Avondale clay loam and Glenbar clay loam, 0 to 2 percent slopes have suitability and limitations ratings of “very limited” and “not limited”, respectively, for dwellings without basements, small commercial buildings, and local roads and streets. A “very limited” rating indicates the soil has one or more features that unfavorable for these specified uses and the limitations generally cannot be overcome without mitigation, such as special design. Both soil types have a suitability and limitations rating of “somewhat limited” for shallow excavations; ergo, these soils have features moderately favorable for the specified use and the limitations can be overcome or minimized by special planning, design, or installation.</p> <p><u>Determination:</u> A geotechnical study is required for construction of new structures, construction of structures and/or site improvements with deep foundations, and/or construction</p> |

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|  |          | <p>of structures and/or site improvements with cast-in-place deep foundations.</p> <p>Project activities involving permanent excavation of greater than two (2) feet in depth, filling of earth of more than one (1) foot in depth, and/or filling of earth more than one-hundred (100) cubic yards require a grading and drainage plan per Phoenix City Code Section 32A-6.</p> <p>A Stormwater Pollution Prevention Plan is required for new construction and activities that decrease the footprint of existing structure when the disturbed area is greater than one (1) acre. New development shall make provisions to retain storm water runoff in accordance with the requirements of Chapter 6, Section 3.8.1 of the City of Phoenix <i>Storm Water Policies and Standards Manual</i>. Sites greater than one (1) acre require a Notice of Intent to discharge determination per ADEQ’s Arizona Pollutant Discharge Elimination System (AZPDES) Program. Compliance assured on site-specific basis through plan review / approval and permitting requirements.</p>   |
| <p>Hazards and Nuisances including Site Safety and Noise</p> | <p>2</p> | <p><u>Source(s)</u>: Project description (ERR 1). Email from Sarah Stockham, Village Planner, dated 1/31/2020 (ERR 16). Area site visit on 2/3/2020. Phoenix City Code Sec. 23-14(h) (<a href="https://phoenix.municipal.codes/CC/23-14">https://phoenix.municipal.codes/CC/23-14</a>).</p> <p><u>Finding</u>: Project activities include major rehabilitation of single- and multi-family residential units; reconstruction of homes; acquisition of vacant lots or blighted residential properties containing structures/homes; demolition of existing residential structures; installation of sidewalks and parking lots; installation of asphalt driveways; and landscape improvements including planting of trees and shrubbery. These activities will reduce and/or eliminate existing man-made hazards and nuisances in the project area, such as vacant and/or blighted buildings, hazards in vacant lots, and front lawn parking. Furthermore, the Crime Prevention Through Environmental Design (CPTED) elements will be incorporated into landscaping improvements to reduce crime opportunities and thereby improve the safety of occupants and protect structures.</p> <p>There are overhead power lines on the northern project boundary, along the alley between Adams and Monroe streets, and on the southern project boundary. These low-voltage power lines do not pose a concern.</p> <p>While construction activities have the potential to increase noise, this potential minor adverse impact will be temporary and short-term in nature. Per City Code, construction activities that require permits under the Phoenix Building Construction Code are only permissible during daytime hours when increased noise levels are generally more tolerable.</p> <p><u>Determination</u>: Standing recommendation will be specified; project activities permitted under the Phoenix Building Construction Code shall be limited to daytime weekday hours between the hours of 6:00 a.m. to 7:00 p.m. from May 1 to and</p> |



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|                    |   | including September 30 and between the hours of 7:00 a.m. and 7:00 p.m. beginning October 1 and including April 30 on non-holiday weekdays. Compliance assured through City Code requirements.   |
| Energy Consumption | 2 | <p><u>Source(s)</u>: Project description (ERR 1). Email from Nick Brown, City Energy Manager, dated 2/7/2020 (ERR 18).</p> <p><u>Finding</u>: Project area is an existing neighborhood. Rehabilitation and reconstruction of existing structures and new infill construction will not result in a significant increase in energy consumption nor will these activities require additional electric utility infrastructure. Furthermore, construction tools and equipment used during rehabilitation and construction activities will consume modest quantities of energy.</p> <p><u>Determination</u>: Compliance assured.</p> |

| Environmental Assessment Factor | Impact Code | Impact Evaluation  |
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| <b>SOCIOECONOMIC</b>            |             |  |
| Employment and Income Patterns  | 1           | <p><u>Source(s)</u>: Project description (ERR 1). Email from Olga Soto, Project Manager, dated 6/10/2020; email from Jesse Garcia, Economic and Housing Development Manager, dated 2/7/2020 (ERR 19).</p> <p><u>Finding</u>: The revitalization project is expected to increase workforce needs as a result of more aggressive business attraction and retention in the area and thus have a long-term beneficial impact on employment. Currently, there is a demand for specialty trade contractors, professional and technical services, non-store retailers, construction contractors, medical staff, and motor vehicle and parts dealers in the project vicinity. While there is a gap between the knowledge, skills, and abilities desired by an employer and those held by the residents, NSD is encouraging non-profits, business owners, and other industry professionals to hire from within the greater EEC, including Focus Area A, and/or provide on-the-job training to increase opportunities for permanent full-time employment as part of the on-going area-wide revitalization efforts in the EEC.</p> <p>To comply with HUD Act Section 3 requirements, contractors awarded rehabilitation work are obligated to pay Davis Bacon wages and to hire residents in the project area, if possible, or from within the EEC or other inner-city neighborhoods. Project may therefore result in a temporary, minor increase in the employment of low- and very-low-income persons from within the project and surrounding areas as a result of the need for demolition and construction trade workers, laborers, landscapers, roofers, security, fencing installation workers, and other construction-related trades during rehabilitation and construction activities.</p> |

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|  |          | <p><u>Determination:</u> Compliance assured through ongoing City compliance with HUD Act Section 3 requirements.</p>   |
| <p>Demographic Character Changes, Displacement</p> | <p>1</p> | <p><u>Source(s):</u> Project description (ERR 1). Email from Olga Soto, Project Manager, dated 3/12/2020 (ERR 20).</p> <p><u>Finding:</u> Project area is located within the EEC, which has a population of 4,397. The main factors contributing to the character of this community include 48% of residents are under the age of 18; the median income is \$13,431; 79% of residences are Hispanic; and 36% of residences have limited English fluency.</p> <p>The revitalization project will make sustainable improvements to the existing housing stock for the health and safety of its occupants. Financial assistance will be offered to eligible low-to-moderate income homeowners to stabilize critical home systems, address immediate health and safety issues, eliminate hazards, conserve water and energy, and address exterior code/blighting violations. Rehabilitation assistance will be offered to property owners of rental housing to help preserve long-term affordability and improve rental housing conditions.</p> <p>Proposed rehabilitation and construction activities will not contribute to reducing or altering the racial or ethnic breakdown of the project area. Project will not result in physical barriers or difficult access that would isolate a particular neighborhood or population group and would not make access to local services, facilities, and institutions or other parts of the city more difficult. On the contrary, project is focused on the welfare of the current residents and brings much-needed resources to an economically depressed area.</p> <p><u>Determination:</u> Compliance assured.</p> |

| Environmental Assessment Factor            | Impact Code | Impact Evaluation  |
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| <b>COMMUNITY FACILITIES AND SERVICES</b>   |             |  |
| <p>Educational and Cultural Facilities</p> | <p>2</p>    | <p><u>Source(s):</u> Project description (ERR 1). Emails from Sara Sims, Special Populations Coordinator, dated 2/20/2020 and 6/8/2020; email from Cyndi Tercero, Family and Community Engagement Manager, dated /2020 (ERR 21). Information Mapped by Address in Phoenix – IMAP, accessed 6/16/2020.</p> <p><u>Finding:</u> Project area is located within the Phoenix Elementary and Phoenix Union High school districts. Augustus H. Shaw Jr. Montessori School, located at 123 North 13<sup>th</sup> Street approximately 0.25 miles to the west, and North High School, located at 1101 East Thomas Road approximately two miles to the north, are the project area’s home schools. While both of these schools can accommodate an increase in student enrollment, Edison Elementary School, located at 804 North 18<sup>th</sup> Street approximately 0.4 miles to the north, is currently only using approximately 60% of their available classrooms and the unused space can accommodate an estimated 375 additional</p> |

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|                                 |   | <p>students if the grade-school-aged student population significantly increases. Many high-school-aged students select their schools based on their interests and do not enroll in their home school, so a significantly increase in enrollment at North High School is not expected.</p> <p>Project area is located approximately one mile east of the Arizona Science Center, Children’s Museum of Phoenix, Heritage Square, and Chase Field. The Phoenix Convention Center, Symphony Hall, and Talking Stick Resort Area are less than 1.5 miles to the west of the project area. Other cultural facilities, such as the Desert Botanical Garden and Phoenix Zoo, are located approximately 5 miles to the east and are easily accessed via the Valley Metro light rail system.</p> <p>The project area is in an urban setting with existing residences and is not expected to create additional demand on educational and/or cultural facilities.</p> <p><u>Determination:</u> Compliance assured.</p>       |
| Commercial Facilities           | 1 | <p><u>Source(s):</u> Project description (ERR 1). Google Maps. Area site visit on 2/3/2020.</p> <p><u>Finding:</u> Commercial facilities within the project area include a surface parking lot with mobile vending and two auto body repair shops. There is wide range of local retail services within walking distance to the project area that provide affordable services to residents, including local restaurants and national fast food chains, a convenience store, a laundromat, and auto services and sales. There is adequate public transportation for residents to access other retail and commercial services in the greater Phoenix area.</p> <p>The existing retail and commercial services within and near the project area are expected to benefit from the revitalization project, which will serve as a catalyst to enhance the physical, social, and economic improvements needed in the project vicinity and support local businesses.</p> <p><u>Determination:</u> Compliance assured.</p> |
| Health Care and Social Services | 2 | <p><u>Source(s):</u> Email from Julie Bordelon, Human Service Department, dated 2/5/2020; email from Tammy Frazee, Human Service Department, dated 2/3/2020 Google Maps screenshots printed 6/16/2020 (ERR 22). Information by Mapped Address in Phoenix – IMAP, accessed 6/16/2020.</p> <p><u>Finding:</u> The closest general hospital is Valleywise Health Medical Center located at 2525 East Roosevelt Street approximately one mile east of the project area. The Travis L. Williams Family Services Center located at 4732 South Central Avenue, approximately 3.5 miles south of the project area, is the closest family services center. It would take approximately 11-12 minutes by automobile and approximately 34-42 minutes by public transportation to reach the center from the project area. The McDowell Place Senior Center, which offers social services such as emergency utility and rental assistance and eviction</p>  |

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|   |          | <p>prevention/move-in assistance for older adults, is located at 1845 East McDowell Road, approximately one mile (3-minute drive) to the north.</p> <p>Project involves the revitalization of an existing inner-city neighborhood, including rehabilitation of existing residential structures and new construction of infill housing on vacant properties. These activities are not expected to result in a significant population increase. Project is focused on welfare of existing residences and the demographic character of the project area will be fundamentally unchanged from implementation of the revitalization activities. Project is therefore not expected to overtax or negatively impact health care and social services.</p> <p><u>Determination:</u> Compliance assured.</p>  |
| <p>Solid Waste Disposal / Recycling</p> | <p>2</p> | <p><u>Source(s):</u> Email from Jesse Duarte, Deputy Public Works Director, dated 1/23/2020 (ERR 23). Information by Mapped Address in Phoenix – IMAP, accessed 6/16/2020. Reimagine Phoenix (<a href="https://www.phoenix.gov/publicworks/reimagine">https://www.phoenix.gov/publicworks/reimagine</a>).</p> <p><u>Finding:</u> Project area is located within the City of Phoenix Public Works Department service area. Garbage and recycling pickup are provided once a week. The closest landfill is the 27<sup>th</sup> Avenue Solid Waste Management Facility at 3060 South 27<sup>th</sup> Avenue, approximately 8 miles to the west. The Public Works Department has the capacity to handle household garbage, composting, and recycling as well as debris resulting from demolition and/or construction activities. Project activities are expected to generate an overall low volume of debris and therefore will have no effect on capacity.</p> <p>Within the city of Phoenix, all relevant projects/activities/programs are designed and completed to ensure compliance with the Mayor’s diversion goal, set forth in the City’s sustainability initiative, Reimagine Phoenix. This initiative increases waste diversion and improves management of solid waste resources. Project activities are required to comply with the diversion goal and therefore are not expected to have an adverse impact on waste disposal or recycling.</p> <p><u>Determination:</u> Compliance assured.</p> |
| <p>Waste Water / Sanitary Sewers</p>    | <p>3</p> | <p><u>Source(s):</u> Email from Nicholas Yourgules, Civil Engineer III, dated 1/30/2020 (ERR 24).</p> <p><u>Finding:</u> Project area is located within the City of Phoenix service area. Assurances of adequate sewer system capacity are made through plan review and approval by the City Planning Water Services Department as required by the City’s Zoning Ordinance. Therefore, project is not expected to adversely impact the existing sewer system.</p> <p><u>Determination:</u> Project-specific stipulations will be determined as part of Tier 2 Environmental Review. Compliance assured through plan review / approval for major rehabs/reconstructions/new construction projects/activities.</p>  |

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| <p>Water Supply</p>                                       | <p>3</p> | <p><u>Source(s)</u>: Project Information for Environmental Review Purposes (ERR 1). Email from Nicholas Yourgules, Civil Engineer III, dated 1/30/2020 (ERR 24).</p> <p><u>Finding</u>: System upgrades, including new water mains, are being implemented in the project and surrounding areas. Specifically, the existing substandard water mains, ranging from 2 to 4 inches, within the project area are currently being abandoned and replaced with new 6-inch lines in Adams and Monroe streets. The existing water meters are being relocated from alleys to streets and a new 12-inch water line is being installed in North 16<sup>th</sup> Street between Washington and Van Buren streets. These system upgrades will improve overall water supply and quality to residents in the project area.</p> <p>Project is not expected to significantly increase consumption of available water supply. Rather, rehabilitation and new construction activities will likely include higher efficiency plumbing fixtures that would decrease consumption. Assurances of adequate water supply capacity are made through plan review and approval by the City Planning Water Services Department as required by the City’s Zoning Ordinance.</p> <p>Project activities would not deteriorate water quality.</p> <p><u>Determination</u>: Project-specific stipulations will be determined as part of Tier 2 Environmental Review. Compliance assured through PDD plan review / approval for major rehabs/reconstructions/new construction projects/activities.</p> |
| <p>Public Safety - Police, Fire and Emergency Medical</p> | <p>1</p> | <p><u>Source(s)</u>: Project description; Project Information for Environmental Review Purposes (ERR 1). Email from Sergeant Shawn Garman-Coppock, dated 1/29/2020; Email from Melissa Sweinhagen, Assistant to the Fire Chief, dated 1/28/2020 (ERR 25). Information by Mapped Address in Phoenix – IMAP, accessed 6/16/2020.</p> <p><u>Finding</u>: Project area is located within the Phoenix Police Department’s Central City Precinct, which is located at 1902 South 16<sup>th</sup> Street, approximately 1.3 miles to the south. Target response times for priority 1 calls is less than five minutes. Target response times for priority 2 calls is less than 20 minutes. While there may be an initial temporary increased burden on police manpower due to vacancies and unoccupied structures, project activities, such removal of blighted properties and implementation of the CPTED elements of the CN program, would reduce crime opportunities thereby improving neighborhood safety and decreasing burden on police manpower.</p> <p>Project area is located within two miles of two Phoenix Fire Department fire stations: Fire Station 8 (1025 Est Polk Street) and Fire Station 11 (2727 East Roosevelt Street). Existing firefighting protection service is adequate and equipped to service the project area. The approximate response time is four minutes. The nearest hospital is Valleywise Health Medical</p>  |

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|   |          | <p>Center located at 2525 East Roosevelt Street, approximately one mile to the northeast of the project area. Project activities will not create a significant burden on fire or health care providers in terms of manpower and/or equipment.</p> <p><u>Determination:</u> Compliance assured.</p>   |
| <p>Parks, Open Space and Recreation</p> | <p>2</p> | <p><u>Source(s):</u> City of Phoenix Interactive Park Map screenshot printed 6/16/2020; Google Maps screenshots printed 6/16/2020; Email from James Orloski, Deputy Director, dated 1/28/2020 (ERR 26). Information by Mapped Address in Phoenix – IMAP, accessed 6/16/2020.</p> <p><u>Finding:</u> Project area is located within one mile of two public parks: Edison Park (1540 East Jefferson Street) and Eastlake Park (902 North 19<sup>th</sup> Street). The closest park, Edison Park, is approximately 0.2 miles (5-minute walk) to the south. Edison Park is approximately 0.8 miles (15-16-minute walk) to the north. Amenities at these parks include children’s playgrounds, picnic areas/ramadas, lighted sports courts, a splash pad (Edison), and a pool and community center (Eastlake). There are also two mini parks within the neighboring Sydney P. Osborn public housing development, which are managed by the City of Phoenix Housing Department: Kana Mini Park (1702 East Adams Street) and Sohu Mini Park (North 18<sup>th</sup> / Monroe streets). Project activities will not overload existing open space, recreational and park facilities.</p> <p><u>Determination:</u> Compliance assured.</p>   |
| <p>Transportation and Accessibility</p> | <p>2</p> | <p><u>Source(s):</u> Email from Kevin Teng, Principal Planner, dated 1/30/2020; Valley Metro April 2020 System Interactive Map screenshot printed 6/16/2020; Valley Metro High-Capacity Transit (HCT) System Map, dated 04/2019; email from Joseph Perez, City of Phoenix Bicycle Coordinator, dated 6/22/2020; email from Olga Soto, City of Phoenix Project Manager, dated 8/20/2020; sidewalk inventory map and photos, dated 8/17/2020 (ERR 27).</p> <p><u>Finding:</u> Project area is boarded by alleys to the north and south and North 16<sup>th</sup> and North 17<sup>th</sup> streets to the east and west and is traversed by Monroe and Adams streets and an alley. Fewer than one-third of the residents in Focus Area A own a car or have access to car.</p> <p>Several bus routes with multiple bus stations are located within one-half mile of the project area, including routes on North 16<sup>th</sup> Street and bus stops at the North 16<sup>th</sup> / Van Buren streets intersection.</p> <p>The Valley Metro Light Rail is located on Washington and Jefferson streets to the south of the project area. The closest light rail station, LRT Station 12<sup>th</sup> Street/Jefferson, is located at 1228 East Jefferson Street approximately 0.5 mile the west of the project area. The existing light rail corridor links the project area to north Phoenix and east to Mesa and provides access to many cultural, educational, and recreational facilities in the</p> |

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|  |  | <p>greater metropolitan area. Several light rail extension projects are planned in proximity to the project area that will increase accessibility, including the South Central Light Rail Extension and the Capital/I-10 West Phase I Light Rail Extension.</p> <p>Transit is accessible via sidewalks along North 16<sup>th</sup> Street, North 17<sup>th</sup> Street, Van Buren Street, and Washington Street. East/west movement across North 16<sup>th</sup> Street is limited to signalized crossings at Van Buren and Washington streets. Curb ramps and tactile strips are available at all street crossings.</p> <p>Construction of a High Intensity Activated crossWalk (HAWK) beacon at 16<sup>th</sup> and Adams streets is planned for 2021. The City of Phoenix Street Transportation Department is also pursuing bike lanes along North 16<sup>th</sup> Street from Jefferson to Adams streets, and possibly as far north as Roosevelt Street.</p> <p><u>Determination:</u> Standing recommendation will be specified for new development / redevelopment on vacant lots and major owner-occupied rehabilitation activities when activities are commensurate with project scope of work. In these cases, City PDD will coordinate with the developer to ensure impaired sidewalk panels are removed and replaced. Shade structures, trees, and landscaping will be incorporated into project design when these activities are commensurate with project scope of work to support the Phoenix General Plan goals.</p> <p>These activities along with construction of sidewalks, Americans with Disabilities Act (ADA) improvements, and landscaping will enhance pedestrian environment and improve street-level activity.</p> |
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| Environmental Assessment Factor          | Impact Code | Impact Evaluation  |
|--|-------------|--|
| <b>NATURAL FEATURES</b>                  |             |  |
| Unique Natural Features, Water Resources | 2           | <p><u>Source(s):</u> Project description (ERR 1). USFWS IPaC System printout dated 1/31/2020; AGFD Arizona Online Environmental Review Tool HGIS-09625 printed 1/31/2020; email from Tricia Balluff, Environmental Programs Coordinator, dated 2/24/2020 (ERR 7). USFWS National Wetland Inventory map printout dated 2/15/2020 (ERR 13). Area site visit on 2/3/2020.</p> <p><u>Finding:</u> Project area is in an urban setting with primarily residential and commercial land use. No native, undeveloped desert, or unique natural features are present. No potential Waters of the U.S. or wetlands are present.</p> <p><u>Determination:</u> Compliance assured.</p> |
| Vegetation, Wildlife                     | 2           | <p><u>Source(s):</u> Project description (ERR 1). USFWS IPaC System printout dated 1/31/2020; AGFD Arizona Online Environmental Review Tool HGIS-09625 printed 1/31/2020; email from Tricia Balluff, Environmental Programs Coordinator, dated 2/24/2020 (ERR 7). Area site visit on 2/3/2020.</p>   |

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|   |          | <p><u>Finding:</u> Project area is in an urban setting with primarily residential and commercial land use. Generally, habitat quality in the analysis area is extremely low and no state sensitive or protected wildlife species would be expected to use the area. No native desert or wash corridors and no marsh, wetland, or riparian vegetation present in project area. Potential habitat for wildlife consists primarily of scattered landscaped trees and vacant lots. No protected native plants will be removed as part of this project.</p> <p><u>Determination:</u> Compliance assured.</p>   |
| <p>Other Factors - Migratory Bird Treaty Act of 1918 (MBTA) 16 U.S.C. §§703 – 712</p> | <p>2</p> | <p><u>Source(s):</u> USFWS IPaC System printout dated 1/31/2020; AGFD Arizona Online Environmental Review Tool HGIS-09625 printed 1/31/2020; email from Tricia Balluff, Environmental Programs Coordinator, dated 2/24/2020 (ERR 7). Area site visit on 2/3/2020.</p> <p><u>Finding:</u> Species protected under the Migratory Bird Treaty Act (MBTA) have the potential to be present in the analysis area. Scattered landscaped trees could potentially be used for nesting by migratory birds. This potential is increased between February 1 and August 31 of any calendar year in Phoenix. While burrowing owls sometimes use vacant dirt lots as habitat and have been found within 3 miles of the project location, this particular area does not have the habitat quality expected for burrowing owl use: no water source or prey base are nearby and soils are likely to be highly compacted. No survey for active nests protected under the Migratory Bird Treaty Act (MBTA) required due to generally low value of habitat present.</p> <p><u>Determination:</u> Standing recommendation will be specified for all projects; if active nests are observed and will be impacted by project activities, the City’s project manager will coordinate with the Office of Environmental Programs to make appropriate arrangements. Compliance assured.</p> |
| <p>Other Factors – Vapor Intrusion</p>  | <p>3</p> | <p><u>Source(s):</u> ADEQ web-based printouts; email from NSD ERO, dated 2/13/2020; <i>Modified Phase I Environmental Site Assessment for Choice Neighborhoods NSD Programs Focus Area A Revitalization Project</i> (ACS 2020) (ERR 6). Area site visit on 2/3/2020.</p> <p><u>Finding:</u> The project area is located within the Motorola 52<sup>nd</sup> Street National Priority List (NPL) Superfund Site boundary. The NPL site consists of a large area of localized soil contamination and a contaminated groundwater plume that generally extends west from the former Motorola facility. The NPL site consists of three operable units (OUs) and the project area is located within OU3. Although current investigations indicate soil vapor intrusion is not a concern within the OU3, investigations are still ongoing.</p> <p><u>Determination:</u> Site-specific activities shall be reviewed for vapor intrusion potential. If (non-bona-fide emergency) rehabilitation/reconstruction/development is to occur on a potentially affected parcel, testing for tetrachloroethene (PCE),</p>  |



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|  | <p>1,1,1-trichloroethane (1,1,1-TCA), and trichloroethene (TCE) vapors is to be conducted both inside any standing, occupied structure and in an outside location(s) on the property. The testing shall occur prior to (non-bona-fide emergency) rehabilitation/reconstruction/development and, if warranted per (then) EPA acceptable residential levels/standards, remedial action plan mitigative treatment(s) such as soil removal/replacement, geomembranes and/or permanent, indoor air venting/quality monitoring shall be incorporated into the proposed Scope of Work so as to long-term mitigate any elevated levels, prior to project approval. Results of testing and potential mitigation requirements shall be submitted to the Office of Environmental Programs for mitigation input and confirmation.</p> |
|--|---|

**Additional Studies Performed:**

- Modified Phase I Environmental Site Assessment for Choice Neighborhoods NSD Programs Focus Area A Revitalization Project (ACS 2020) (ERR 6)*
- Focus Area A Historic-age Residential Property Inventories (Murray 2019) (ERR 10)*
- Archaeological Treatment Plan Addendum for Neighborhood Services Department in Focus Areas in the Edison-Eastlake Community Project, Phoenix (Herr 2019) (ERR 10)*

**Field Inspection** (Date and completed by): Windshield survey completed on 2/3/2020 by Melinda Jones, Senior Environmental Planner, Archaeological Consulting Services, Ltd; sidewalk inspection completed on 8/17/2020 by Ashton Koons and Amber Huntoon-Colvin, Archaeological Consulting, Ltd.

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

Persons Consulted

- André D. Best, City of Phoenix NSD, Environmental Quality Specialist
- Olga Soto, City of Phoenix NSD, Project Manager
- Laurene Montero, City of Phoenix Archaeology Office, City Archaeologist
- Rebecca Hill, City of Phoenix Archaeological Office, Contract Associate Archaeologist
- Jodey Elsner, City of Phoenix Historic Preservation Office, Planner II
- Elizabeth Wilson, City of Phoenix Historic Preservation office, Planner III
- Sara Stockham, City of Phoenix Planning and Development Department, Village Planner
- Nicholas Yourgules, City of Phoenix Water Services Department, Civil Engineer III
- Matthew Miles, City of Phoenix Planning and Development Department, Civil Engineer III
- Melissa Sweinhagen, Phoenix Fire Department, Assistant to the Fire Chief
- Tricia Balluff, City of Phoenix Office of Environmental Programs, Environmental Programs Coordinator
- James Orloski, City of Phoenix Parks and Recreation Department, Deputy Director
- Nicholas Brown, City of Phoenix Office of Sustainability, City Energy Manager
- Jesse Duarte, City of Phoenix Public Works Department, Deputy Public Works Director
- Shawn Garman-Coppock, Phoenix Police Department, Community Action Officer
- James Marshall, City of Phoenix Street Transportation Department, Environmental Programs Coordinator

Matthew Potzler, City of Phoenix Office of Environmental Programs, Environmental Quality Specialist

Ken Teng, City of Phoenix Public Transit Department, Deputy Public Transit Director

Joseph Perez, City of Phoenix Street Transportation Department, Traffic Engineer II

Tammy Frazee, City of Phoenix Human Services Department, Human Services Program Coordinator

Julie Bordelon, City of Phoenix Human Services Department, Community Initiatives Specialist

Jesse Garcia, City of Phoenix NSD, Economic and Housing Development Manager

Cynthia Tercero, Phoenix Union High School District, Family and Community Engagement Manager

Sara Sims, Phoenix Elementary School District, Special Populations Coordinator/Homeless Coordinator

#### Websites Referenced:

ADEQ eMaps – <http://gisweb.azdeq.gov/arcgis/emaps/>

AGFD Arizona Online Environmental Review Tool – <https://azhgis2.esri.com/>

City of Phoenix Information Mapped by Address in Phoenix (IMAP) –

<https://mapapps.phoenix.gov/iMap/iMap.html>

City of Phoenix Central City Village Planning Committee website –

<https://www.phoenix.gov/villages/Central-City>

City of Phoenix Comprehensive Bicycle Master Plan –

[https://www.phoenix.gov/streetssite/Documents/Bicycle%20Master%20Plan/2014bikePHX\\_Final\\_web.pdf](https://www.phoenix.gov/streetssite/Documents/Bicycle%20Master%20Plan/2014bikePHX_Final_web.pdf)

City of Phoenix Neighborhood Services website – <https://www.phoenix.gov/nsd/programs>

City of Phoenix Planning and Development website – <https://www.phoenix.gov/pdd>

City of Phoenix T2050 Mobility Improvements Program –

<https://www.phoenix.gov/streets/mobility>

Downtown Phoenix, Inc. – <https://dtpnx.org/2020/04/08/12-developments-to-watch-in-downtown-phoenix/>

EPA EJSCREEN – <https://www.epa.gov/ejscreen>

EPA Current Nonattainment Counties for All Criteria Air Pollutants –

<https://www3.epa.gov/airquality/greenbook/ancl.html>

EPA NEPAassist Mapping Tool – <https://www.epa.gov/nepa/nepassist>

FEMA Flood Map Service Center – <https://msc.fema.gov/portal/home>

Google Maps – <https://www.google.com/maps/>

HUD Day/Night Noise Level Electronic Assessment Tool –

<https://www.hudexchange.info/programs/environmental-review/daynight-noise-level-electronic-assessment-tool/>

Maricopa County Assessors' Parcel Viewer – <https://maps.mcasessor.maricopa.gov/>

NRCS Web Soil Survey – <https://websoilsurvey.nrcs.usda.gov/app/>

Phoenix City Code and Zoning Ordinance – <https://phoenix.municipal.codes>

Reimagine Phoenix – <https://www.phoenix.gov/publicworks/reimagine>

USFWS IPaC System – <https://ecos.fws.gov/ipac/>

USFWS NWI Wetlands Mapper – <https://www.fws.gov/wetlands/data/Mapper.html>

**List of Permits Obtained:** No permits were obtained as part of the EA. Project activities will be individually permitted, as necessary, during the Tier-2 Environmental Review.

**Public Outreach** [24 CFR 50.23 & 58.43]:

In addition to the visual assessment completed by NSD staff to identify the first priority area, staff conducted community outreach in Focus Area A with a series of “Knock and Talks” and “Pop-up Information Kiosks” in the community where staff served hotdogs and provided program information to attendees. The goal was to educate residents about NSD’s housing rehabilitation programs and to identify interested participants. Staff engaged all available residents within Focus Area A, completed 16 surveys, and had six residents request follow-up site visits to continue discussions about the available programs. The CN Team continues to facilitate regular Resident Committee meetings to solicit feedback about design direction and amenities.

More generally, one of NSD’s core services historically is to work with communities by teaching residents how to engage with their neighbors, particularly when there are common interests or a common problem to resolve. Oftentimes, residents want to beautify their community and learn how to access city services. NSD has proactively focused many of its neighborhood engagement efforts in the EEC since 2017 in coordination with the City Housing Department’s overall revitalization efforts.

In October 2017, NSD led a neighborhood clean-up with over 100 volunteers to bring awareness of the CN OVP and engage residents. The clean-up targeted the four focus areas and involved removing dead vegetation and debris while making improvements to home façades through flower and tree plantings, adding granite to front yards, and new paint where necessary. The clean-up complemented the improvements made through NSD’s housing rehabilitation programs. On-going beautification efforts that include exterior upgrades and alley clean-ups are planned but temporarily suspended due to COVID-19.

Since it is vital that the property owners and renters can sustain property, NSD staff will work with property owners in each focus area to educate them on how to maintain their properties and systems. Private partnerships with home improvement supply companies such as Home Depot and Lowe’s are in place to solicit donations for materials that can assist in neighborhood clean-ups that directly support neighborhood beautification efforts, and to assist property owners with necessary materials for minor home improvements. Additionally, NSD will encourage residents in each area to form a neighborhood association for stronger community engagement.

**Cumulative Impact Analysis** [24 CFR 58.32]:

The Focus Area A Revitalization Project is the first of four geographically based community improvement projects to be completed under the four-year strategic CN revitalization program. Under this program, major rehabilitations, reconstructions, demolitions, and other improvement activities will occur not only within Focus Area A but also within three other distressed neighborhoods in the EEC.

Other past, present and foreseeable future projects in and around the EEC that have contributed and/or will contribute to the revitalization of the larger Phoenix’s inner city include:

- Valley Metro light rail on Washington and Jefferson streets (2008)
- CityScape (2012)

- Chase Field stadium improvements (2019)
- Talking Stick Resort Arena Renovations (present)
- Edison Park playground replacement project (present)
- Redevelopment of A.L. Krohn, Frank Luke Homes, and Sidney P. Osborn public housing communities (present)
- Valley Metro South Central Extension/Downtown Hub (future)
- Various development projects including residential high rises, hotels, a biomedical campus, and university dorms (present)
- City of Phoenix's Transportation 2050 (T2050) Mobility Improvements Program – new bicycle and pedestrian facilities (future)

All the above-listed projects support the transformation of the EEC into a vibrant and active neighborhood and together will enhance the stability and sustainability of the inner-city community thereby incrementally benefiting the community and future growth of the city of Phoenix.

When added to other past, present and reasonably foreseeable future neighborhood revitalization efforts and transit improvements in the surrounding area, the Focus Area A Revitalization Project will not result in incremental adverse impacts on the quality of the human environment. Conversely, the Focus Area A Revitalization Project together with the other CN Program revitalization efforts and development projects is expected to contribute incrementally to the beneficial direct and indirect impacts on the quality of the human environment in the community by addressing housing-related health and safety issues, improving pedestrian safety, eliminating neighborhood hazards such as blighted properties and structures, deterring crime, conserving water, and improving energy efficiency.

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

Neighborhood Services Department did not identify other project sites or designs. As outlined in the CCI, the Neighborhood Beautification is limited to the Edison-Eastlake Communities, bounded by 16th Street to the west, 20th Street to the east, I-10 Interstate to the north and the railroad tracks to the south.

As outlined in NSD's CCI Plan, the CN program, a four-phase, multiyear strategic neighborhood revitalization effort, is limited to the EEC, which is bounded by North 16th Street to the west, North 20th Street to the east, I-10 to the north, and the railroad tracks to the south. Four critical focus areas (A-D) were identified through on-site assessments as having the greatest opportunity for community engagement and overall positive neighborhood impact based on proximity to planned new development. Focus Area A is the first geographically based effort within the CN program area. No other areas outside of the four focus areas were identified for this effort based on the project screening criteria.

Since repairing homes is an important element in the city's strategy to enhance the quality and value of a neighborhood and to promote sustainable communities, NSD is committed to improving neighborhood housing conditions by targeting its housing rehabilitation programs, including Owner Occupied Rehabilitation, Rental Rehabilitation, Weatherization Assistance and Lead Hazard Control, in the EEC. Weatherization and Lead Hazard Control funds can be used in both rental and owner-occupied properties.

NSD is modifying the terms of its general Rental Rehabilitation program to create an EEC-modified Rental Rehabilitation Program for single and multi-family rental properties for greater participation and impact, while still meeting funding source requirements, since most of the housing stock in the EEC is rental verses homeownership. The EEC Rental Rehabilitation program is designed to provide safe and affordable rental housing through flexible financing opportunities that support the rehabilitation of single-family rental and multi-family rental units.

Due to the large geographic area the EEC encompasses, NSD will focus the EEC-modified Rental Rehabilitation program in key geographic areas (i.e., Focus Areas A-D) with defined boundaries to maximize the impact of CCI and leveraged funds. Additionally, the focused area approach will enhance NSD’s ability to engage residents to form neighborhood associations or block watches, improving their ability to sustain the improvements made to their homes. Within each of the focus areas, NSD assessed current property conditions to determine the level of improvements available funding could support.

Currently, there are 88 single-family rental homes, plus 23 multi-family rental properties containing 80 rental units for a total of 168 rental units in the EEC that appear to need home repairs. With a goal of improving the visual aesthetics of the EEC neighborhoods, NSD will create an EEC-modified Rental Rehabilitation that will be leveraged with other housing rehabilitation programs (e.g. Lead Hazard Control, Weatherization Assistance, Emergency Home Repair, and other programs) to address the exterior appearance of all eligible properties and interior improvements as may be needed for safety and energy efficiency.

Exterior improvements may include repairing or replacing roofs, windows and doors, and new paint. Sustainable landscaping is another important element to the community’s aesthetics and engagement. While incorporating CPTED approaches to reduce crime-inviting landscaping, NSD will assist with planting items that are shade and xeriscape-friendly, utilize granite to reduce dust, and make other improvements as reasonable and cost effective.

To ensure the needs of the EEC property owners and renters will be met, NSD enhanced its housing rehabilitation program requirements to eliminate or reduce barriers for program eligibility. The table below illustrates the changes between the existing and EEC-modified Rental Rehabilitation programs.

| <b>Program Requirements</b>               | <b>Existing</b>                                     | <b>EEC-Modified</b>                                 |
|---|---|---|
| Eligible Properties                       | Multi-Family Only                                   | Single & Multi-Family                               |
| Property Unit Minimum                     | Two or More Units                                   | No Minimum  |
| Maximum Loan Amount                       | The lesser of \$25K per unit or \$250K per property | The lesser of \$35K per unit or \$300K per property |
| No Interest, No payment, Forgivable Loan  | 10-Year Loan  | 5-Year Loan   |
| Minimum Owner Match of Total Project Cost | Minimum of 25%                                      | Minimum of 5%                                       |

**No Action Alternative [24 CFR 58.40(e)]:**

Under the no action alternative, no rehabilitation or new infill housing construction activities would occur. Based upon a street-level visual survey, approximately 64% of the businesses need some level of exterior repair. Additionally, there are 88 single-family rental homes, plus 23 multi-family rental properties containing 80 rental units for a total of 168 rental units in the EEC that appear to need home repairs. Existing residential structures are expected continue to deteriorate since the residents are low- to very-low income persons and thus likely unable to finance the repairs themselves. The vacant lots and blighted structures that currently present unsafe conditions would likely continue to exist since the neighborhood would not be a favorable location for infill development compared to other inner city neighborhoods where revitalization is occurring. Overall, the current conditions would continue to display a poor image to others, deter new residents, business owners, and investors from moving into the neighborhood, discourage walking and biking, and create an unsafe environment.

The no action alternative would continue to deteriorate the social fabric of the neighborhood and overall neighborhood confidence. The existing physical, social, and economic barriers that isolate the residents will continue to exist, and the desirability of the project area as a place to live, work and visit would continue to decrease under the no action alternative. The no action alternative would have long-term adverse impacts on welfare of the residents and business owners in the project and surrounding areas, and therefore, this alternative does not meet the project’s purpose and need.

**Summary of Findings and Conclusions:**

Several areas of environmental review within the project area require site-specific reviews when projects become ripe for review later in the program and/or mitigation to ensure that a tiered Finding of No Significant Impact (FONSI) is obtained. Through strict conformance with the prescribed mitigations (refer to Mitigation Measures Environmental Justice Evaluation Matrix in ERR 15 and the Mitigation Measures and Conditions section below), the project will not significantly impact the quality of the human environment or result in noncompliance with the related laws and authorities. Overall, project activities will result in sustainable improvements that will have long-term benefits not only for residents and business owners in the project area but also the surrounding area.

**Mitigation Measures and Conditions [40 CFR 1505.2(c)]**

Summarize below 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  |
|---------------------------|---|
| Clean Air                 | Dust control permit is required for earthmoving activities on areas greater than 1/10 acre. If dust control permit is required, consult Maricopa County Department of Air Quality. Since environment is not being fundamentally changed (i.e., rehabbing an already developed area) and project activities are below the de minimis requirements, a general conformity determination is not required. |

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|  | <p>Compliance with the National Emission Standards for Hazardous Air Pollutants (NEPSHAP) will be evaluated on a project-specific basis as part of Tier 2 Environmental Review. The City of Phoenix HUD-Funded Project NESHAP Compliance / Asbestos Assessment Form shall be completed as a mitigative requirement for project activities involving multi-family/multi-structure rehabilitations and demolition of stand-alone single-/multi-family residential structures. The action triggers and required compliance documents are referenced on the form.</p> <p>As required by the Clean Air Act, project activities shall require a permit for the removal and disposal of Regulated Asbestos Containing Materials (RACM), prior to the disturbance of any RACM. Contact with/disturbance of ACM/RACM by OSHA-trained personnel only. Asbestos-related permits required, as applicable. Copy of obtained Maricopa County NESHAP permit to be emailed to NSD’s ERO.</p>  |
| <p>Contaminants and Toxic Substances</p> | <p>Site-specific activities shall be reviewed for nearby facility hazards. Additionally, if unanticipated hazardous materials are encountered during site-specific project activities, the following requirements apply:</p> <ul style="list-style-type: none"> <li>– Unanticipated hazardous materials encountered during construction shall be handled and removed in compliance with applicable federal, state, and local laws.</li> <li>– Appropriate federal, state, and local authorities shall be notified immediately of any hazardous materials releases during construction activities and corrective actions shall be taken to minimize any release impacts.</li> </ul> <p>While it is unlikely radon will present a concern for closed air structures within the project area, site-specific testing is required for non-emergency rehabilitation activities on existing residences to determine its presence and to fully assess the potential risk to occupants and necessary mitigation. Radon-resistant construction is required for new residential construction and other site-specific activities involving ‘new air space’ in a residence, when commensurate with testing outcome and the project rehab type.</p> |
| <p>Historic Preservation</p>             | <p>Archaeological treatment shall follow recommendations presented in the <i>Archaeological Treatment Plan Addendum for Neighborhood Services Department in Focus Areas in the Edison-Eastlake Community Project, Phoenix</i> (Herr 2019). Archaeological monitoring and/or phased data recovery requirements are dependent on the type of proposed action in these areas and will be evaluated on a site-specific (Tier-2) basis.</p>  |
| <p>Noise Abatement and Control</p>       | <p>Project activities involving new construction, major rehabilitation, and modernization and occurring within Focus Area A Noise Impact Area require site-specific noise analysis as part of Tier 2 Environmental Review. If within site-</p>  |

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|  | specific Noise Impact Area implement mitigations defined through site-specific noise assessment.   |
| Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design | New structures should conform to the height of existing one-story single-family and multifamily residences and up to two-story commercial uses and the design and construction of decks and patios should be sensitive to potential privacy concerns for adjacent single-story structures.   |
| Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff                   | <p>A geotechnical study is required for construction of new structures, construction of structures with deep foundations, and/or construction of structures with case in place deep foundations.</p> <p>Project activities involving permanent excavation of greater than 2 feet in depth, filling of earth of more than 1 foot in depth, and/or filling of earth more than 100 cubic yards require a grading and drainage plan per Phoenix City Code Section 32A-6.</p> <p>A Stormwater Pollution Prevention Plan is required for new construction and activities that decrease the footprint of existing structure when the disturbed area is greater than one acre. New development shall make provisions to retain storm water runoff in accordance with the requirements of Chapter 6, Section 3.8.1 of the City of Phoenix <i>Storm Water Policies and Standards Manual</i>. Sites greater than one acre require a Notice of Intent to discharge determination per ADEQ's Arizona Pollutant Discharge Elimination System (AZPDES) Program.</p> |
| Hazards and Nuisances including Site Safety and Noise                            | Standing recommendation will be specified that project activities permitted under the Phoenix Building Construction Code shall be limited to daytime weekday hours between the hours of 6:00 a.m. to 7:00 p.m. from May 1 to and including September 30 and between the hours of 7:00 a.m. and 7:00 p.m. beginning October 1 and including April 30 on non-holiday weekdays.   |
| Wastewater/Sanitary Sewers/Water Supply  | Project-specific stipulations will be determined as part of Tier 2 Environmental Review through PDD review and approval of site plans for major rehabs/reconstructions/new construction projects/activities.   |
| Transportation and Accessibility   | Standing recommendation will be specified for new development / redevelopment on vacant lots and major owner-occupied rehabilitation activities when activities are commensurate with project scope of work. In these cases, City PDD will coordinate with the developer to ensure impaired sidewalk panels are removed and replaced. Shade structures, trees, and landscaping will be incorporated into project design when these activities are commensurate with project scope of work to support the Phoenix General Plan goals.   |
| Migratory Bird Treaty Act  | Standing recommendation will be specified for all projects that if active nests are observed and will be impacted by project activities, the City's project manager will coordinate  |




|                 |   |
|-----------------|---|
|                 | with the Office of Environmental Programs to make appropriate arrangements.   |
| Vapor Intrusion | Site-specific activities shall be reviewed for vapor intrusion potential. If (non-bona-fide emergency) rehabilitation/reconstruction/development is to occur on a parcel, testing for tetrachloroethene (PCE), 1,1,1-trichloroethane (1,1,1-TCA), and trichloroethene (TCE) vapors is to be conducted both inside any standing, occupied structure and in an outside location(s) on the property. The testing shall occur prior to (non-bona-fide emergency) rehabilitation/reconstruction/development and, if warranted per (then) EPA acceptable residential levels/standards, remedial action plan mitigative treatment(s) such as soil removal/replacement, geomembranes and/or permanent, indoor air venting/quality monitoring would be incorporated into the proposed Scope of Work so as to long-term mitigate any elevated levels, prior to project approval. Results of testing and potential mitigation requirements shall be submitted to the Office of Environmental Programs for mitigation input and confirmation. |

**Determination:**

**Finding of No Significant Impact** [24 CFR 58.40(g)(1); 40 CFR 1508.27]  
 The project will not result in a significant impact on the quality of the human environment.

**Finding of Significant Impact** [24 CFR 58.40(g)(2); 40 CFR 1508.27]  
 The project may significantly affect the quality of the human environment.

Preparer Signature: Melinda Jones Date: 8/28/2020 9.1.2020 

Name/Title/Organization: Melinda Jones, Sr. Environmental Planner, Archaeological Consulting Services, Ltd.

Certifying Officer Signature:  Date: Sep 14, 2020  
 Name/Title: Spencer J. Self, Neighborhood Services Director

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).