Environmental Review
for Activity/Project that is Exempt or
Categorically Excluded Not Subject to Section 58.5
Pursuant to 24 CFR 58.34(a) and 58.35(b)

Project Information

Project Name: R.O.S.E.S-in-home-senior-services
HEROS Number: 900000010056445

Responsible Entity (RE): ROYAL OAK, DEPUTY DIRECTOR COMMUNITY DEVELOPMENT ROYAL OAK MI, 48068

State / Local Identifier:

RE Preparer: Joseph M. Murphy

Grant Recipient (if different than Responsible Entity):

Point of Contact:

Consultant (if applicable):

Point of Contact:

Project Location: 211 S Williams St, Royal Oak, MI 48067

Additional Location Information:
city-wide

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:
CDBG funds will expended on supportive services for elderly, income qualified Royal Oak residents. The Royal Oak Senior Essential Services (R.O.S.E.S.) program is organized by staff at the city-owned Senior Center. Contracted workers perform subsidized home chores, minor repairs, and personal care assistance for income qualified residents. Home chores include household tasks such as snow shoveling, lawn mowing, yard work, etc. Home repairs, which do not require a licensed contractor, include minor plumbing, carpentry, and electrical work. Personal care may include assistance with activities of daily living.

Level of Environmental Review Determination
Activity / Project is Exempt per 24 CFR 58.34(a):
58.34(a)(4)

Signature Page
ROSES.pdf

Funding Information

<table>
<thead>
<tr>
<th>Grant / Project Identification Number</th>
<th>HUD Program</th>
<th>Program Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>B-18-MC-26-0011</td>
<td>Community Planning and Development (CPD)</td>
<td>Community Development Block Grants (CDBG) (Entitlement)</td>
</tr>
</tbody>
</table>

Estimated Total HUD Funded, Assisted or Insured Amount: $33,000.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: $33,000.00

Compliance with 24 CFR §50.4 & §58.6 Laws and Authorities

<table>
<thead>
<tr>
<th>Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4 &amp; §58.6</th>
<th>Are formal compliance steps or mitigation required?</th>
<th>Compliance determination (See Appendix A for source determinations)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Airport Runway Clear Zones and Clear Zones&lt;br&gt;24 CFR part 51</td>
<td>☐ Yes ☑ No</td>
<td>Based on the project description the project includes no activities that would require further evaluation under this section. The project is in compliance with Airport Runway Clear Zone requirements.</td>
</tr>
<tr>
<td>Coastal Barrier Resources Act&lt;br&gt;Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]</td>
<td>☐ Yes ☑ No</td>
<td>This project is not located in a CBRS Unit. Therefore, this project has no potential to impact a CBRS Unit and is in compliance with the Coastal Barrier Resources Act.</td>
</tr>
<tr>
<td>Flood Insurance&lt;br&gt;Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]</td>
<td>☐ Yes ☑ No</td>
<td>Based on the project description the project includes no activities that would require further evaluation under this section. The project does not require flood insurance or is excepted from</td>
</tr>
</tbody>
</table>
Compliance Factors:
Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4 & §58.6

<table>
<thead>
<tr>
<th>Are formal compliance steps or mitigation required?</th>
<th>Compliance determination (See Appendix A for source determinations)</th>
</tr>
</thead>
</table>

STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6

- **Flood Insurance**: While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with Flood Insurance requirements.

Mitigation Measures and Conditions [CFR 40 1505.2(c)]: Summarized below are all mitigation measures adopted by the Responsible Entity to reduce, avoid or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

<table>
<thead>
<tr>
<th>Law, Authority, or Factor</th>
<th>Mitigation Measure or Condition</th>
<th>Comments on Completed Measures</th>
<th>Complete</th>
</tr>
</thead>
</table>

Mitigation Plan

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

Airport Runway Clear Zones

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

1. **Does the project involve the sale or acquisition of developed property?**
   - Yes

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

   **Compliance Determination**
   Based on the project description the project includes no activities that would require further evaluation under this section. The project is in compliance with Airport Runway Clear Zone requirements.

   **Supporting documentation**

   [Airport Clear Zone documentation.pdf](#)

   **Are formal compliance steps or mitigation required?**
   - Yes
   - No

   **Based on the response, the review is in compliance with this section.**
Coastal Barrier Resources

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

1. **Is the project located in a CBRS Unit?**
   - [✓] No

   Document and upload map and documentation below.
   
   Yes

**Screen Summary**

**Compliance Determination**

This project is not located in a CBRS Unit. Therefore, this project has no potential to impact a CBRS Unit and is in compliance with the Coastal Barrier Resources Act.

**Supporting documentation**

[Coastal Barrier Resource System documentation.pdf](Coastal Barrier Resource System documentation.pdf)

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

- [✓] No

- [✓] No
Flood Insurance

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

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

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

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

   Yes

**Screen Summary**

**Compliance Determination**

Based on the project description the project includes no activities that would require further evaluation under this section. The project does not require flood insurance or is excepted from flood insurance. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with Flood Insurance requirements.

**Supporting documentation**

*Flood Insurance & Floodplain documentation.pdf*

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

   ✔ Yes

   ✔ No
Environmental Review
for Activity/Project that is Exempt or
Categorically Excluded Not Subject to Section 58.5
Pursuant to 24 CFR 58.34(a) and 58.35(b)

Project Information

Project Name: R.O.S.E.S-in-home-senior-services
HEROS Number: 900000010056445

State / Local Identifier:

Project Location: 211 S Williams St, Royal Oak, MI 48067

Additional Location Information:
city-wide

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:
CDBG funds will expended on supportive services for elderly, income qualified Royal Oak residents. The Royal Oak Senior Essential Services (R.O.S.E.S.) program is organized by staff at the city-owned Senior Center. Contracted workers perform subsidized home chores, minor repairs, and personal care assistance for income qualified residents. Home chores include household tasks such as snow shoveling, lawn mowing, yard work, etc. Home repairs, which do not require a licensed contractor, include minor plumbing, carpentry, and electrical work. Personal care may include assistance with activities of daily living.

Level of Environmental Review Determination
Activity / Project is Exempt per 24 CFR 58.34(a):
58.34(a)(4)

Funding Information

<table>
<thead>
<tr>
<th>Grant Number</th>
<th>HUD Program</th>
<th>Program Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>B-18-MC-26-0011</td>
<td>Community Planning and Development (CPD)</td>
<td>Community Development Block Grants (CDBG) (Entitlement)</td>
</tr>
</tbody>
</table>

Estimated Total HUD Funded Amount: $33,000.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: $33,000.00

Mitigation Measures and Conditions [CFR 1505.2(c)]:

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

<table>
<thead>
<tr>
<th>Law, Authority, or Factor</th>
<th>Mitigation Measure or Condition</th>
<th>Comments on Completed Measures</th>
<th>Complete</th>
</tr>
</thead>
</table>

Preparer Signature: ___________________________ Date: __31 MAY 2018___

Name / Title / Organization: Joseph M. Murphy / / ROYAL OAK

Responsible Entity Agency Official Signature: ___________________________ Date: __06/11/18___

Name/ Title: ___________________________ Michael C. Fournier, Mayor

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environment Review Record (ERR) for the activity / project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).
Environmental Review
for Activity/Project that is Exempt or
Categorically Excluded Not Subject to Section 58.5
Pursuant to 24 CFR 58.34(a) and 58.35(b)

Project Information

Project Name: homeless-services---South-Oakland-Shelter
HEROS Number: 900000010056449

Responsible Entity (RE): ROYAL OAK, DEPUTY DIRECTOR COMMUNITY DEVELOPMENT ROYAL OAK MI, 48068

State / Local Identifier:

RE Preparer: Joseph M. Murphy
Grant Recipient (if different than Responsible Entity):

Point of Contact:

Consultant (if applicable):

Point of Contact:

Project Location: 211 S Williams St, Royal Oak, MI 48067

Additional Location Information:
city-wide

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:
The South Oakland Shelter (SOS) provides a wide array of services designed to permanently remove individuals and families from the cycle of homelessness. CDBG funds will be utilized to reimburse SOS for services provided in its Emergency Shelter program. The program is designed to utilize case management services for individual clients to gain access to job and financial education training, food, transportation and lodging. It will assist those experiencing homelessness with a last known address of Royal Oak.

Level of Environmental Review Determination
Activity / Project is Exempt per 24 CFR 58.34(a):
58.34(a)(4)
Funding Information

<table>
<thead>
<tr>
<th>Grant / Project Identification Number</th>
<th>HUD Program</th>
<th>Program Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>B-18-MC-26-0011</td>
<td>Community Planning and Development (CPD)</td>
<td>Community Development Block Grants (CDBG) (Entitlement)</td>
</tr>
</tbody>
</table>

Estimated Total HUD Funded, Assisted or Insured Amount: $20,000.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: $20,000.00

Compliance with 24 CFR §50.4 & §58.6 Laws and Authorities

<table>
<thead>
<tr>
<th>Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4 &amp; §58.6</th>
<th>Are formal compliance steps or mitigation required?</th>
<th>Compliance determination (See Appendix A for source determinations)</th>
</tr>
</thead>
<tbody>
<tr>
<td>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 &amp; § 58.6</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Airport Runway Clear Zones and Clear Zones 24 CFR part 51</td>
<td>☐ Yes ☑ No</td>
<td>Based on the project description the project includes no activities that would require further evaluation under this section. The project is in compliance with Airport Runway Clear Zone requirements.</td>
</tr>
<tr>
<td>Coastal Barrier Resources Act Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]</td>
<td>☐ Yes ☑ No</td>
<td>This project is not located in a CBRS Unit. Therefore, this project has no potential to impact a CBRS Unit and is in compliance with the Coastal Barrier Resources Act.</td>
</tr>
<tr>
<td>Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]</td>
<td>☐ Yes ☑ No</td>
<td>Based on the project description the project includes no activities that would require further evaluation under this section. The project does not require flood insurance or is excepted from flood insurance. While flood insurance</td>
</tr>
</tbody>
</table>
**Compliance Factors:**
Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4 & §58.6

<table>
<thead>
<tr>
<th>Are formal compliance steps or mitigation required?</th>
<th>Compliance determination (See Appendix A for source determinations)</th>
</tr>
</thead>
</table>

**STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & §58.6**

May not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with Flood Insurance requirements.

**Mitigation Measures and Conditions** [CFR 40 1505.2(c)]: Summarized below are all mitigation measures adopted by the Responsible Entity to reduce, avoid or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

<table>
<thead>
<tr>
<th>Law, Authority, or Factor</th>
<th>Mitigation Measure or Condition</th>
<th>Comments on Completed Measures</th>
<th>Complete</th>
</tr>
</thead>
</table>

**Mitigation Plan**

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

Airport Runway Clear Zones

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

1. **Does the project involve the sale or acquisition of developed property?**
   - Yes  
   - No

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

Compliance Determination

Based on the project description the project includes no activities that would require further evaluation under this section. The project is in compliance with Airport Runway Clear Zone requirements.

Supporting documentation

[Airport Clear Zone documentation.pdf](#)

Are formal compliance steps or mitigation required?

- Yes
- No
Coastal Barrier Resources

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

1. Is the project located in a CBRS Unit?
   ✔️ No

Document and upload map and documentation below.
Yes

Screen Summary
Compliance Determination
This project is not located in a CBRS Unit. Therefore, this project has no potential to impact a CBRS Unit and is in compliance with the Coastal Barrier Resources Act.

Supporting documentation

Coastal Barrier Resource System documentation.pdf

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

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

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

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

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

   Yes

Screen Summary

Compliance Determination

Based on the project description the project includes no activities that would require further evaluation under this section. The project does not require flood insurance or is excepted from flood insurance. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with Flood Insurance requirements.

Supporting documentation

Flood Insurance & Floodplain documentation.pdf

Are formal compliance steps or mitigation required?

   Yes

   ✓ No
Environmental Review for Activity/Project that is Exempt or Categorically Excluded Not Subject to Section 58.5 Pursuant to 24 CFR 58.34(a) and 58.35(b)

Project Information

Project Name: homeless-services---South-Oakland-Shelter

HEROS Number: 9000000010056449

State / Local Identifier:

Project Location: 211 S Williams St, Royal Oak, MI 48067

Additional Location Information:
city-wide

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:
The South Oakland Shelter (SOS) provides a wide array of services designed to permanently remove individuals and families from the cycle of homelessness. CDBG funds will be utilized to reimburse SOS for services provided in its Emergency Shelter program. The program is designed to utilize case management services for individual clients to gain access to job and financial education training, food, transportation and lodging. It will assist those experiencing homelessness with a last known address of Royal Oak.

Level of Environmental Review Determination
Activity / Project is Exempt per 24 CFR 58.34(a):
58.34(a)(4)

Funding Information

<table>
<thead>
<tr>
<th>Grant Number</th>
<th>HUD Program</th>
<th>Program Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>B-18-MC-26-0011</td>
<td>Community Planning and Development (CPD)</td>
<td>Community Development Block Grants (CDBG) (Entitlement)</td>
</tr>
</tbody>
</table>

Estimated Total HUD Funded Amount: $20,000.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: $20,000.00

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

<table>
<thead>
<tr>
<th>Law, Authority, or Factor</th>
<th>Mitigation Measure or Condition</th>
<th>Comments on Completed Measures</th>
<th>Complete</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Preparer Signature: [Signature] Date: 31 MAY 2018

Name / Title / Organization: Joseph M. Murphy / ROYAL OAK

Responsible Entity Agency Official Signature: [Signature] Date: 06/11/18

Name / Title: MICHAEL C. FOURNIER, MAYOR

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environment Review Record (ERR) for the activity / project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).
Environmental Review for Activity/Project that is
Categorically Excluded Subject to Section 58.5
Pursuant to 24 CFR 58.35(a)

Project Information

Project Name: housing-rehab-program---owner-rehabilitation-assistance

HEROS Number: 900000010056455

Responsible Entity (RE): ROYAL OAK, DEPUTY DIRECTOR COMMUNITY DEVELOPMENT ROYAL OAK MI, 48068

State / Local Identifier:

RE Preparer: Joseph M. Murphy

Certifying Officer: Michael C. Fournier, Mayor

Grant Recipient (if different than Responsible Entity):

Point of Contact:

Consultant (if applicable):

Point of Contact:

Project Location: 211 S Williams St, Royal Oak, MI 48067

Additional Location Information:
city-wide

Direct Comments to:

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

A city administered program to provide technical and financial assistance to low- and moderate-income residents of the City of Royal Oak to rehabilitate owner-occupied single family houses on a city-wide basis.

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

**Level of Environmental Review Determination:**
Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at 58.5:
- 58.34(a)(12)
- 58.35(a)(3)(i)

**Determination:**

| ✔ | This categorically excluded activity/project converts to **EXEMPT** per Section 58.34(a)(12), because it does not require any mitigation for compliance with any listed statutes or authorities, nor requires any formal permit or license; **Funds may be committed and drawn down after certification of this part** for this (now) EXEMPT project; OR |

| | This categorically excluded activity/project cannot convert to Exempt status because one or more statutes or authorities listed at Section 58.5 requires formal consultation or mitigation. Complete consultation/mitigation protocol requirements, **publish NOI/RROF and obtain “Authority to Use Grant Funds”** (HUD 7015.16) per Section 58.70 and 58.71 before committing or drawing down any funds; OR |

| | This project is not categorically excluded OR, if originally categorically excluded, is now subject to a full Environmental Assessment according to Part 58 Subpart E due to extraordinary circumstances (Section 58.35(c)). |

**Approval Documents:**
- housing rehab.pdf

**Funding Information**

7015.15 certified by Certifying Officer on: 

7015.16 certified by Authorizing Officer on:
Estimated Total HUD Funded, Assisted or Insured Amount: $850,000.00

Estimated Total Project Cost: $850,000.00

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

<table>
<thead>
<tr>
<th>Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6</th>
<th>Are formal compliance steps or mitigation required?</th>
<th>Compliance determination (See Appendix A for source determinations)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Airport Hazards Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D</td>
<td>□ Yes ☑ No</td>
<td>The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements.</td>
</tr>
<tr>
<td>Coastal Barrier Resources Act Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]</td>
<td>□ Yes ☑ No</td>
<td>This project is not located in a CBRS Unit. Therefore, this project has no potential to impact a CBRS Unit and is in compliance with the Coastal Barrier Resources Act.</td>
</tr>
<tr>
<td>Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]</td>
<td>□ Yes ☑ No</td>
<td>Based on the project description the project includes no activities that would require further evaluation under this section. The project does not require flood insurance or is excepted from flood insurance. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with Flood Insurance requirements.</td>
</tr>
<tr>
<td>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 &amp; § 58.5</td>
<td></td>
<td></td>
</tr>
<tr>
<td>------------------------------------------------------------------------------------------------</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| **Air Quality**  
Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93 | □ Yes ☑ No | Based on the project description, this project includes no activities that would require further evaluation under the Clean Air Act. The project is in compliance with the Clean Air Act. |
| **Coastal Zone Management Act**  
Coastal Zone Management Act, sections 307(c) & (d) | □ Yes ☑ No | This project is not located in or does not affect a Coastal Zone as defined in the state Coastal Management Plan. The project is in compliance with the Coastal Zone Management Act. |
| **Contamination and Toxic Substances**  
24 CFR 50.3(i) & 58.5(i)(2)] | □ Yes ☑ No | On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. The project is in compliance with contamination and toxic substances requirements. |
| **Endangered Species Act**  
Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402 | □ Yes ☑ No | This project will have No Effect on listed species due to the nature of the activities involved in the project. This project is in compliance with the Endangered Species Act. |
| **Explosive and Flammable Hazards**  
Above-Ground Tanks)[24 CFR Part 51 Subpart C | □ Yes ☑ No | Based on the project description the project includes no activities that would require further evaluation under this section. The project is in compliance with explosive and flammable hazard requirements. |
| **Farmlands Protection**  
Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658 | □ Yes ☑ No | This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is in compliance with the Farmland Protection Policy Act. |
| **Floodplain Management**  
Executive Order 11988, particularly section 2(a); 24 CFR Part 55 | □ Yes ☑ No | This project does not occur in a floodplain. The project is in compliance with Executive Order 11988. |
| **Historic Preservation**  
National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800 | □ Yes ☑ No | Based on Section 106 consultation there are No Historic Properties Affected because there are no historic properties present. The project is in compliance with Section 106. |
Noise Abatement and Control  
Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B

| ☐ Yes ☑ No | The project is modernization or minor rehabilitation of an existing residential property. The project will include standardized noise attenuation measures. The project is in compliance with HUD's Noise regulation. |

Sole Source Aquifers  
Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149

| ☐ Yes ☑ No | Based on the project description, the project consists of activities that are unlikely to have an adverse impact on groundwater resources. The project is in compliance with Sole Source Aquifer requirements. |

Wetlands Protection  
Executive Order 11990, particularly sections 2 and 5

| ☐ Yes ☑ No | Based on the project description this project includes no activities that would require further evaluation under this section. The project is in compliance with Executive Order 11990. |

Wild and Scenic Rivers Act  
Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)

| ☐ Yes ☑ No | This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act. |

**HUD HOUSING ENVIRONMENTAL STANDARDS**

**ENVIRONMENTAL JUSTICE**

**Environmental Justice**  
Executive Order 12898

| ☐ Yes ☑ No | No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898. |

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

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

<table>
<thead>
<tr>
<th>Law, Authority, or Factor</th>
<th>Mitigation Measure or Condition</th>
<th>Comments on Completed Measures</th>
<th>Complete</th>
</tr>
</thead>
</table>

06/12/2018 14:12  
Page 5 of 30
Mitigation Plan

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

Airport Hazards

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

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

✓ No

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

Yes

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

Supporting documentation

Airport Clear Zone documentation.pdf

Are formal compliance steps or mitigation required?
Yes

✓ No
Coastal Barrier Resources

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

1. Is the project located in a CBRS Unit?

✓ No

Document and upload map and documentation below.

Yes

Screen Summary

Compliance Determination

This project is not located in a CBRS Unit. Therefore, this project has no potential to impact a CBRS Unit and is in compliance with the Coastal Barrier Resources Act.

Supporting documentation

Coastal Barrier Resource System documentation.pdf

Are formal compliance steps or mitigation required?

Yes

✓ No
Flood Insurance

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

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

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

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

Yes

**Screen Summary**

**Compliance Determination**

Based on the project description the project includes no activities that would require further evaluation under this section. The project does not require flood insurance or is excepted from flood insurance. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with Flood Insurance requirements.

**Supporting documentation**

Flood Insurance & Floodplain documentation.pdf

Are formal compliance steps or mitigation required?

Yes

✔ No
Air Quality

<table>
<thead>
<tr>
<th>General requirements</th>
<th>Legislation</th>
<th>Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Clean Air Act is administered by the U.S. Environmental Protection Agency (EPA), which sets national standards on ambient pollutants. In addition, the Clean Air Act is administered by States, which must develop State Implementation Plans (SIPs) to regulate their state air quality. Projects funded by HUD must demonstrate that they conform to the appropriate SIP.</td>
<td>Clean Air Act (42 USC 7401 et seq.) as amended particularly Section 176(c) and (d) (42 USC 7506(c) and (d))</td>
<td>40 CFR Parts 6, 51 and 93</td>
</tr>
</tbody>
</table>

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

   Yes

   ✅ No

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

Screen Summary
Compliance Determination
Based on the project description, this project includes no activities that would require further evaluation under the Clean Air Act. The project is in compliance with the Clean Air Act.

Supporting documentation
Air Quality documentation.pdf

Are formal compliance steps or mitigation required?

   Yes

   ✅ No
Coastal Zone Management Act

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

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

   Yes
   
   ✓ No

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

Screen Summary

Compliance Determination
This project is not located in or does not affect a Coastal Zone as defined in the state Coastal Management Plan. The project is in compliance with the Coastal Zone Management Act.

Supporting documentation

Coastal Zone Management documentation.pdf

Are formal compliance steps or mitigation required?

   Yes

   ✓ No
Contamination and Toxic Substances

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

1. Evaluate the site for contamination. Were any on-site or nearby toxic, hazardous, or radioactive substances found that could affect the health and safety of project occupants or conflict with the intended use of the property?

✓ No

Explain:
existing single-family home sites.

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

Yes

Check here if an ASTM Phase I Environmental Site Assessment (ESA) report was utilized. [Note: HUD regulations does not require an ASTM Phase I ESA report for single family homes]

Screen Summary
Compliance Determination
On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. The project is in compliance with contamination and toxic substances requirements.

Supporting documentation
Are formal compliance steps or mitigation required?

- {Yes}

- {No}
Endangered Species

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

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

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

   This selection is only appropriate if none of the activities involved in the project have potential to affect species or habitats. Examples of actions without potential to affect listed species may include: purchasing existing buildings, completing interior renovations to existing buildings, and replacing exterior paint or siding on existing buildings.
   Based on the response, the review is in compliance with this section.

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

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

Screen Summary
Compliance Determination
This project will have No Effect on listed species due to the nature of the activities involved in the project. This project is in compliance with the Endangered Species Act.
Supporting documentation

Endangered Species documentation.pdf

Are formal compliance steps or mitigation required?

Yes

✓ No
Explosive and Flammable Hazards

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

1. **Is the proposed HUD-assisted project a hazardous facility (a facility that mainly stores, handles or processes flammable or combustible chemicals), i.e. bulk fuel storage facilities, refineries, etc.?**

   ✓ No

   Yes

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

   ✓ No

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

Yes

**Screen Summary**

**Compliance Determination**

Based on the project description the project includes no activities that would require further evaluation under this section. The project is in compliance with explosive and flammable hazard requirements.

**Supporting documentation**

**Explosive and Flammable Operations documentation.pdf**

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

Yes
Farmlands Protection

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

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

   Yes

   ✔ No

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

   not applicable

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

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

Supporting documentation

Farmlands Protection documentation.pdf

Are formal compliance steps or mitigation required?

   ✔ No
Floodplain Management

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

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

- 55.12(c)(3)
- 55.12(c)(4)
- 55.12(c)(5)
- 55.12(c)(6)
- 55.12(c)(7)
- 55.12(c)(8)
- 55.12(c)(9)
- 55.12(c)(10)
- 55.12(c)(11)

✓ None of the above

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

[Flood Risk Map 08-05-2015.pdf]

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

Does your project occur in a floodplain?

✓ No

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

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

Supporting documentation

Flood Insurance & Floodplain documentation(1).pdf

Are formal compliance steps or mitigation required?
    Yes
    ✓ No
Historic Preservation

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

Threshold

Is Section 106 review required for your project?

- No, because the project consists solely of activities listed as exempt in a Programmatic Agreement (PA). (See the PA Database to find applicable PAs.)

- No, because the project consists solely of activities included in a No Potential to Cause Effects memo or other determination [36 CFR 800.3(a)(1)].

- Yes, because the project includes activities with potential to cause effects (direct or indirect).

**Step 1 – Initiate Consultation**

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

- State Historic Preservation Offer (SHPO)  Completed

- Advisory Council on Historic Preservation  Not Required

- Indian Tribes, including Tribal Historic Preservation Officers (THPOs) or Native Hawaiian Organizations (NHOs)
Describe the process of selecting consulting parties and initiating consultation here:
All structures that are fifty (50) years of age or older must be reviewed by the Michigan SHPO, unless the proposed work is considered a project type that does not require consultation with the SHPO per the SHPO’s February 2005 memorandum. Under the housing rehabilitation program, any exterior materials that are being replaced with non-historic, modern materials are referred to the SHPO for consultation prior to any site work commencing.

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

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

1. Define the Area of Potential Effect (APE), either by entering the address(es) or uploading a map depicting the APE below:
   
   City-wide. PY2018 has not started. Each rehabilitation project site will be reviewed individually.

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

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

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

Additional Notes:

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

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

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

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

✓ No Historic Properties Affected

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

Document reason for finding:

✓ No historic properties present.

Historic properties present, but project will have no effect upon them.

No Adverse Effect

Adverse Effect

Screen Summary

Compliance Determination

Based on Section 106 consultation there are No Historic Properties Affected because there are no historic properties present. The project is in compliance with Section 106.

Supporting documentation

Historic Preservation documentation.pdf

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

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

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

- New construction for residential use
- **Rehabilitation of an existing residential property**
- A research demonstration project which does not result in new construction or reconstruction
- An interstate land sales registration
- Any timely emergency assistance under disaster assistance provision or appropriations which are provided to save lives, protect property, protect public health and safety, remove debris and wreckage, or assistance that has the effect of restoring facilities substantially as they existed prior to the disaster
- None of the above

**Screen Summary**

**Compliance Determination**

The project is modernization or minor rehabilitation of an existing residential property. The project will include standardized noise attenuation measures. The project is in compliance with HUD’s Noise regulation.
Supporting documentation

[Noise Abatement documentation.pdf]

Are formal compliance steps or mitigation required?
  Yes
  ✓ No
Sole Source Aquifers

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

1. Does the project consist solely of acquisition, leasing, or rehabilitation of an existing building(s)?
   - Yes
   - No

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

Screen Summary
Compliance Determination
Based on the project description, the project consists of activities that are unlikely to have an adverse impact on groundwater resources. The project is in compliance with Sole Source Aquifer requirements.

Supporting documentation
Sole Source Aquifers documentation.pdf

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

<table>
<thead>
<tr>
<th>General requirements</th>
<th>Legislation</th>
<th>Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Executive Order 11990 discourages direct or indirect support of new construction impacting wetlands wherever there is a practicable alternative. The Fish and Wildlife Service’s National Wetlands Inventory can be used as a primary screening tool, but observed or known wetlands not indicated on NWI maps must also be processed Off-site impacts that result in draining, impounding, or destroying wetlands must also be processed.</td>
<td>Executive Order 11990</td>
<td>24 CFR 55.20 can be used for general guidance regarding the 8 Step Process.</td>
</tr>
</tbody>
</table>

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

   ✓ No

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

   Yes

**Screen Summary**

**Compliance Determination**

Based on the project description this project includes no activities that would require further evaluation under this section. The project is in compliance with Executive Order 11990.

**Supporting documentation**

[Wetland documentation.pdf](Wetland
documentation.pdf)

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

   Yes

   ✓ No
Wild and Scenic Rivers Act

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

1. **Is your project within proximity of a NWSRS river?**
   
   ✓ No

   Yes, the project is in proximity of a Designated Wild and Scenic River or Study Wild and Scenic River.
   Yes, the project is in proximity of a Nationwide Rivers Inventory (NRI) River.

**Screen Summary**

**Compliance Determination**

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

**Supporting documentation**

[Wild and Scenic Rivers documentation.pdf](Wild and Scenic Rivers documentation.pdf)

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

   Yes
   ✓ No
Environmental Justice

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

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

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

   Yes
   ✓ No

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

Screen Summary
Compliance Determination
No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898.

Supporting documentation

Environmental Justice documentation.pdf

Are formal compliance steps or mitigation required?
   Yes
   ✓ No
Environmental Review for Activity/Project that is
Categorically Excluded Subject to Section 58.5
Pursuant to 24 CFR 58.35(a)

Project Information

Project Name: housing-rehab-program---owner-rehabilitation-assistance

HEROS Number: 900000010056455

State / Local Identifier:

Project Location: 211 S Williams St, Royal Oak, MI 48067

Additional Location Information:

city-wide

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:
A city administered program to provide technical and financial assistance to low- and moderate-income residents of the City of Royal Oak to rehabilitate owner-occupied single family houses on a city-wide basis.

Level of Environment Review Determination:
Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at §58.5:
58.34(a)(12)
58.35(a)(3)(i)

Funding Information

<table>
<thead>
<tr>
<th>Grant Number</th>
<th>HUD Program</th>
<th>Program Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>B-18-MC-26-0011</td>
<td>Community Planning and Development (CPD)</td>
<td>Community Development Block Grants (CDBG) (Entitlement)</td>
</tr>
</tbody>
</table>

Estimated Total HUD Funded Amount: $850,000.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: $850,000.00

Mitigation Measures and Conditions [CFR 1505.2(c)]:
Summarized below are all mitigation measures adopted by the Responsible Entity to reduce, avoid or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.
<table>
<thead>
<tr>
<th>Law, Authority, or Factor</th>
<th>Mitigation Measure or Condition</th>
<th>Comments on Completed Measures</th>
<th>Complete</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>This categorically excluded activity/project converts to EXEMPT per Section 58.34(a)(12), because it does not require any mitigation for compliance with any listed statutes or authorities, nor requires any formal permit or license; <strong>Funds may be committed and drawn down after certification of this part</strong> for this (now) EXEMPT project; OR</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>This categorically excluded activity/project cannot convert to Exempt status because one or more statutes or authorities listed at Section 58.5 requires formal consultation or mitigation. Complete consultation/mitigation protocol requirements, <strong>publish NOI/RROF and obtain “Authority to Use Grant Funds” (HUD 7015.16) per Section 58.70 and 58.71 before committing or drawing down any funds; OR</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>This project is not categorically excluded OR, if originally categorically excluded, is now subject to a full Environmental Assessment according to Part 58 Subpart E due to extraordinary circumstances (Section 58.35(c)).</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Preparer Signature: [Signature] Date: 31 May 2018

Name / Title / Organization: Joseph M. Murphy / ROYAL OAK

Responsible Entity Agency Official Signature: [Signature] Date: 06/11/18

Name / Title: MICHAEL C. FOURNIER, MAYOR

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environment Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).
Environmental Review for Activity/Project that is Categorically Excluded Subject to Section 58.5 Pursuant to 24 CFR 58.35(a)

Project Information

Project Name: outdoor-fitness-equipment-neighborhood-parks

HEROS Number: 900000010056457

Responsible Entity (RE): ROYAL OAK, DEPUTY DIRECTOR COMMUNITY DEVELOPMENT ROYAL OAK MI, 48068

State / Local Identifier:

RE Preparer: Joseph M. Murphy

Certifying Office: Michael C. Fournier, Mayor

Grant Recipient (if different than Responsible Entity):

Point of Contact:

Consultant (if applicable):

Point of Contact:

Project Location: 211 Williams, Royal Oak, MI 48067

Additional Location Information:
Cody Park is located at the intersection of E 12 Mile Rd & Cody St (800 Cody St) Grant Park is located at the intersection of E 4th St & Kayser Ave (700 E 4th St) Barton Park - North is located at S Troy St & Pingree Blvd (200 Pingree Blvd) Waterworks Park - Lloyd Ave/Beechwood Dr/Magnolia Ave/Marywood Dr (606 Lloyd)
Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:
CDBG funds will be utilized to retain a contractor to purchase and install outdoor fitness equipment at Cody Park, Grant Park, Barton Park - North, & Waterworks parks. Each park will be surveyed to determine the most appropriate location and scale of outdoor fitness equipment based on the park setting, composition of the surrounding neighborhood and budget. The city will hire professional consultants to assess the total number and individual components of the equipment for each park. The project’s ground disturbing activities include excavation to create a base for all outdoor fitness equipment areas. The exact dimensions of each outdoor fitness equipment area at individual parks is unknown at this time since the survey has not yet been conducted. However, the base shall contain durable, 100% post-consumer recycled, interlocking rubber tiles designed to offer a non-slip, ADA-compliant surface that exceeds impact resistant standards. Alternatively, an artificial turf may be utilized. Areas surrounding the excavation site will be properly restored with dirt, sod/seed, and if necessary a landscape barrier. None of the parks contain any buildings. Each park contains open space, play fields, recreation equipment and landscaping/trees. The city will be retaining the same use (park) without changing the size of the public facility / park boundaries. The project involves purchasing and installing new recreational equipment within existing neighborhood parks. Staff has also determined, in the interest of safety and reducing injuries, that all mulch within the fall zone of existing playground equipment (children's swing sets & play structures) in each park will be replaced with impact resistant rubber tiles.

Maps, photographs, and other documentation of project location and description:
photographs - Barton Park - North.pdf
aerial photos - Cody Park.pdf
photographs - Grant Park.pdf
photographs - Waterworks Park.pdf

Level of Environmental Review Determination:
Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at
58.5:
58.34(a)(12)
58.35(a)(1)

Determination:

This categorically excluded activity/project converts to EXEMPT per Section 58.34(a)(12), because it does not require any mitigation for compliance with any listed statutes or authorities, nor requires any formal permit or license; Funds may be committed and drawn down after certification of this part for this (now) EXEMPT project; OR
This categorically excluded activity/project cannot convert to Exempt status because one or more statutes or authorities listed at Section 58.5 requires formal consultation or mitigation. Complete consultation/mitigation protocol requirements, publish NOI/RROF and obtain “Authority to Use Grant Funds” (HUD 7015.16) per Section 58.70 and 58.71 before committing or drawing down any funds; OR

This project is not categorically excluded OR, if originally categorically excluded, is now subject to a full Environmental Assessment according to Part 58 Subpart E due to extraordinary circumstances (Section 58.35(c)).

Approval Documents:
outdoor fitness equipment.pdf

7015.15 certified by Certifying Officer
on:

7015.16 certified by Authorizing Officer
on:

Funding Information

<table>
<thead>
<tr>
<th>Grant / Project Identification Number</th>
<th>HUD Program</th>
<th>Program Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>B-18-MC-26-0011</td>
<td>Community Planning and Development (CPD)</td>
<td>Community Development Block Grants (CDBG) (Entitlement)</td>
</tr>
</tbody>
</table>

Estimated Total HUD Funded, Assisted or Insured Amount: $900,000.00

Estimated Total Project Cost: $900,000.00

Compliance with 24 CFR §50.4, §58.5 and §58.6 Laws and Authorities
### Compliance Factors:
Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6

| Compliance Determination (See Appendix A for source determinations) |
| Are formal compliance steps or mitigation required? |

### STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6

#### Airport Hazards
Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</table>

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

#### Coastal Barrier Resources Act
Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</table>

- This project is not located in a CBRS Unit. Therefore, this project has no potential to impact a CBRS Unit and is in compliance with the Coastal Barrier Resources Act.

#### Flood Insurance

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</table>

- Based on the project description the project includes no activities that would require further evaluation under this section. The project does not require flood insurance or is excepted from flood insurance. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with Flood Insurance requirements.

### STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5

#### Air Quality
Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</table>

- Based on the project description, this project includes no activities that would require further evaluation under the Clean Air Act. The project is in compliance with the Clean Air Act.

#### Coastal Zone Management Act
Coastal Zone Management Act, sections 307(c) & (d)

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</table>

- This project is not located in or does not affect a Coastal Zone as defined in the state Coastal Management Plan. The project is in compliance with the Coastal Zone Management Act.

#### Contamination and Toxic Substances
24 CFR 50.3(i) & 58.5(i)(2)]

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</table>

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

<table>
<thead>
<tr>
<th><strong>Endangered Species Act</strong></th>
<th>Yes ☑️ No</th>
<th>This project will have No Effect on listed species due to the nature of the activities involved in the project. This project is in compliance with the Endangered Species Act.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Explosive and Flammable Hazards</strong></th>
<th>Yes ☑️ No</th>
<th>Based on the project description the project includes no activities that would require further evaluation under this section. The project is in compliance with explosive and flammable hazard requirements.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Above-Ground Tanks; 24 CFR Part 51 Subpart C</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Farmlands Protection</strong></th>
<th>Yes ☑️ No</th>
<th>This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is in compliance with the Farmland Protection Policy Act.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Floodplain Management</strong></th>
<th>Yes ☑️ No</th>
<th>This project does not occur in a floodplain. The project is in compliance with Executive Order 11988.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Historic Preservation</strong></th>
<th>Yes ☑️ No</th>
<th>Based on Section 106 consultation there are No Historic Properties Affected because there are no historic properties present. The project is in compliance with Section 106.</th>
</tr>
</thead>
<tbody>
<tr>
<td>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Noise Abatement and Control</strong></th>
<th>Yes ☑️ No</th>
<th>Based on the project description, this project includes no activities that would require further evaluation under HUD’s noise regulation. The project is in compliance with HUD’s Noise regulation.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Sole Source Aquifers</strong></th>
<th>Yes ☑️ No</th>
<th>The project is not located on a sole source aquifer area. The project is in compliance with Sole Source Aquifer requirements.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Wetlands Protection</strong></th>
<th>Yes ☑️ No</th>
<th>Based on the project description this project includes no activities that would require further evaluation under this section. The project is in compliance with Executive Order 11990.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Executive Order 11990, particularly sections 2 and 5</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Wild and Scenic Rivers Act
Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c) □ Yes ☑ No This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act.

HUD HOUSING ENVIRONMENTAL STANDARDS

ENVIRONMENTAL JUSTICE

Environmental Justice Executive Order 12898 □ Yes ☑ No No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898.

Mitigation Measures and Conditions [40 CFR 1505.2(c)]:
Summarized below are all mitigation measures adopted by the Responsible Entity to reduce, avoid or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

<table>
<thead>
<tr>
<th>Law, Authority, or Factor</th>
<th>Mitigation Measure or Condition</th>
<th>Comments on Completed Measures</th>
<th>Complete</th>
</tr>
</thead>
</table>

Mitigation Plan

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

Airport Hazards

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

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

✓ No

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

Yes

Screen Summary

Compliance Determination

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

Supporting documentation

Airport Clear Zone documentation.pdf

Are formal compliance steps or mitigation required?

Yes

✓ No
Coastal Barrier Resources

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

1. **Is the project located in a CBRS Unit?**
   - ✓ No

Document and upload map and documentation below.

Yes

**Screen Summary**

**Compliance Determination**

This project is not located in a CBRS Unit. Therefore, this project has no potential to impact a CBRS Unit and is in compliance with the Coastal Barrier Resources Act.

**Supporting documentation**

[Coastal Barrier Resource System documentation.pdf](Coastal%20Barrier%20Resource%20System%20documentation.pdf)

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

   - Yes
   - ✓ No
Flood Insurance

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

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

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

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

Yes

**Screen Summary**

**Compliance Determination**

Based on the project description the project includes no activities that would require further evaluation under this section. The project does not require flood insurance or is excepted from flood insurance. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with Flood Insurance requirements.

**Supporting documentation**

Flood Insurance & Floodplain documentation.pdf

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

Yes

✓ No
Air Quality

<table>
<thead>
<tr>
<th>General requirements</th>
<th>Legislation</th>
<th>Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Clean Air Act is administered by the U.S. Environmental Protection Agency (EPA), which sets national standards on ambient pollutants. In addition, the Clean Air Act is administered by States, which must develop State Implementation Plans (SIPs) to regulate their state air quality. Projects funded by HUD must demonstrate that they conform to the appropriate SIP.</td>
<td>Clean Air Act (42 USC 7401 et seq.) as amended particularly Section 176(c) and (d) (42 USC 7506(c) and (d))</td>
<td>40 CFR Parts 6, 51 and 93</td>
</tr>
</tbody>
</table>

1. Does your project include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units?
   - Yes
   - No

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

Screen Summary
Compliance Determination
Based on the project description, this project includes no activities that would require further evaluation under the Clean Air Act. The project is in compliance with the Clean Air Act.

Supporting documentation
Air Quality documentation.pdf

Are formal compliance steps or mitigation required?
   - Yes
   - No
Coastal Zone Management Act

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

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

   Yes

   ✓ No

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

   Screen Summary
   Compliance Determination
   This project is not located in or does not affect a Coastal Zone as defined in the state Coastal Management Plan. The project is in compliance with the Coastal Zone Management Act.

   Supporting documentation

   Coastal Zone Management documentation.pdf

   Are formal compliance steps or mitigation required?

   Yes

   ✓ No
Contamination and Toxic Substances

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

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

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

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

   - No

   **Explain:**
   
The sites are dedicated city-owned park facilities.

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

   Yes

**Screen Summary**

**Compliance Determination**

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

Supporting documentation

Hazardous Toxic Radio Sub documentation.pdf

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

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

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

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

   This selection is only appropriate if none of the activities involved in the project have potential to affect species or habitats. Examples of actions without potential to affect listed species may include: purchasing existing buildings, completing interior renovations to existing buildings, and replacing exterior paint or siding on existing buildings.

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

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

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

### Screen Summary

**Compliance Determination**

This project will have No Effect on listed species due to the nature of the activities involved in the project. This project is in compliance with the Endangered Species Act.
Supporting documentation

Endangered Species documentation.pdf

Are formal compliance steps or mitigation required?
  Yes
  ✓ No
Explosive and Flammable Hazards

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

1. Is the proposed HUD-assisted project a hazardous facility (a facility that mainly stores, handles or processes flammable or combustible chemicals), i.e. bulk fuel storage facilities, refineries, etc.?

   ✓ No
   
   Yes

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

   ✓ No

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

Yes

Screen Summary

Compliance Determination

Based on the project description the project includes no activities that would require further evaluation under this section. The project is in compliance with explosive and flammable hazard requirements.

Supporting documentation

Explosive and Flammable Operations documentation.pdf

Are formal compliance steps or mitigation required?

Yes
outdoor-fitness-equipment-neighborhood-parks

✓ No
Farmlands Protection

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

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

   Yes

   ✗ No

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

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

**Screen Summary**

**Compliance Determination**

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

**Supporting documentation**

*Farmlands Protection documentation.pdf*

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

   Yes

   ✗ No
### Floodplain Management

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

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

- 55.12(c)(3)
- 55.12(c)(4)
- 55.12(c)(5)
- 55.12(c)(6)
- 55.12(c)(7)
- 55.12(c)(8)
- 55.12(c)(9)
- 55.12(c)(10)
- 55.12(c)(11)

✓ None of the above

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


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

**Does your project occur in a floodplain?**

✓ No

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

Yes
Screen Summary

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

Supporting documentation

Flood Insurance & Floodplain documentation(1).pdf

Are formal compliance steps or mitigation required?
- Yes
- No

✓ No
**Historic Preservation**

<table>
<thead>
<tr>
<th>General requirements</th>
<th>Legislation</th>
<th>Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Regulations under Section 106 of the National Historic Preservation Act (NHPA) require a consultative process to identify historic properties, assess project impacts on them, and avoid, minimize, or mitigate adverse effects</td>
<td>Section 106 of the National Historic Preservation Act (16 U.S.C. 470f)</td>
<td>36 CFR 800 “Protection of Historic Properties” <a href="http://www.access.gpo.gov/nara/cfr/waisdx_10/36cfr800_10.html">http://www.access.gpo.gov/nara/cfr/waisdx_10/36cfr800_10.html</a></td>
</tr>
</tbody>
</table>

**Threshold**

*Is Section 106 review required for your project?*

- No, because the project consists solely of activities listed as exempt in a Programmatic Agreement (PA). (See the PA Database to find applicable PAs.)

- No, because the project consists solely of activities included in a No Potential to Cause Effects memo or other determination [36 CFR 800.3(a)(1)].

- Yes, because the project includes activities with potential to cause effects (direct or indirect).

**Step 1 – Initiate Consultation**

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

- State Historic Preservation Offer (SHPO) In progress

- Advisory Council on Historic Preservation Not Required

- Indian Tribes, including Tribal Historic Preservation Officers (THPOs) or Native Hawaiian Organizations (NHOs)
Other Consulting Parties

Describe the process of selecting consulting parties and initiating consultation here:
SHPO consultation required under law.

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

Step 2 – Identify and Evaluate Historic Properties

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

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

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

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

Additional Notes:

Section 106 Review documentation mailed to the Michigan SHPO on May 23, 2018.

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

   Yes

   ✔ No

Step 3 – Assess Effects of the Project on Historic Properties

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

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

- No Historic Properties Affected

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

Document reason for finding:

- No historic properties present.

  Historic properties present, but project will have no effect upon them.

No Adverse Effect

Adverse Effect

Screen Summary

Compliance Determination

Based on Section 106 consultation there are No Historic Properties Affected because there are no historic properties present. The project is in compliance with Section 106.

Supporting documentation

PY2018 Section 106 MI SHPO submittal.pdf

Are formal compliance steps or mitigation required?

- Yes

- No
Noise Abatement and Control

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

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

- New construction for residential use
- Rehabilitation of an existing residential property
- A research demonstration project which does not result in new construction or reconstruction
- An interstate land sales registration
- Any timely emergency assistance under disaster assistance provision or appropriations which are provided to save lives, protect property, protect public health and safety, remove debris and wreckage, or assistance that has the effect of restoring facilities substantially as they existed prior to the disaster

- [ ] None of the above

**Screen Summary**

**Compliance Determination**

Based on the project description, this project includes no activities that would require further evaluation under HUD's noise regulation. The project is in compliance with HUD's Noise regulation.

**Supporting documentation**

[Noise Abatement documentation.pdf](#)
Are formal compliance steps or mitigation required?

- Yes
- No
Sole Source Aquifers

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

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

   Yes
   ✓ No

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

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

   < No
   ✓

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

   Yes

3. Does your region have a memorandum of understanding (MOU) or other working agreement with Environmental Protection Agency (EPA) for HUD projects impacting a sole source aquifer?
Screen Summary

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

Supporting documentation

[Sole Source Aquifers documentation.pdf](Sole%20Source%20Aquifers%20documentation.pdf)

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

<table>
<thead>
<tr>
<th>General requirements</th>
<th>Legislation</th>
<th>Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Executive Order 11990 discourages direct or indirect support of new construction impacting wetlands wherever there is a practicable alternative. The Fish and Wildlife Service’s National Wetlands Inventory can be used as a primary screening tool, but observed or known wetlands not indicated on NWI maps must also be processed Off-site impacts that result in draining, impounding, or destroying wetlands must also be processed.</td>
<td>Executive Order 11990</td>
<td>24 CFR 55.20 can be used for general guidance regarding the 8 Step Process.</td>
</tr>
</tbody>
</table>

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

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

   Yes

**Screen Summary**

**Compliance Determination**

Based on the project description this project includes no activities that would require further evaluation under this section. The project is in compliance with Executive Order 11990.

**Supporting documentation**

[Wetland documentation.pdf](Wetland%20documentation.pdf)

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

   Yes

   ✓ No
Wild and Scenic Rivers Act

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

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

✓ No

Yes, the project is in proximity of a Designated Wild and Scenic River or Study Wild and Scenic River.
Yes, the project is in proximity of a Nationwide Rivers Inventory (NRI) River.

Screen Summary

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

Supporting documentation

Wild and Scenic Rivers documentation.pdf

Are formal compliance steps or mitigation required?

Yes

✓ No
Environmental Justice

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

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

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

   Yes
   ✓ No

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

Screen Summary
Compliance Determination
No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898.

Supporting documentation

Environmental Justice documentation.pdf

Are formal compliance steps or mitigation required?

   Yes
   ✓ No
Environmental Review for Activity/Project that is
Categorically Excluded Subject to Section 58.5
Pursuant to 24 CFR 58.35(a)

Project Information

Project Name: outdoor-fitness-equipment-neighborhood-parks
HEROS Number: 900000010056457

State / Local Identifier:
Project Location: 211 Williams, Royal Oak, MI 48067

Additional Location Information:
Cody Park is located at the intersection of E 12 Mile Rd & Cody St (800 Cody St) Grant Park is located at the intersection of E 4th St & Kayser Ave (700 E 4th St) Barton Park - North is located at S Troy St & Pingree Blvd (200 Pingree Blvd) Waterworks Park - Lloyd Ave/Beechwood Dr/Magnolia Ave/Marywood Dr (606 Lloyd)

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:
CDBG funds will be utilized to retain a contractor to purchase and install outdoor fitness equipment at Cody Park, Grant Park, Barton Park - North, & Waterworks parks. Each park will be surveyed to determine the most appropriate location and scale of outdoor fitness equipment based on the park setting, composition of the surrounding neighborhood and budget. The city will hire professional consultants to assess the total number and individual components of the equipment for each park. The project's ground disturbing activities include excavation to create a base for all outdoor fitness equipment areas. The exact dimensions of each outdoor fitness equipment area at individual parks is unknown at this time since the survey has not yet been conducted. However, the base shall contain durable, 100% post-consumer recycled, interlocking rubber tiles designed to offer a non-slip, ADA-compliant surface that exceeds impact resistant standards. Alternatively, an artificial turf may be utilized. Areas surrounding the excavation site will be properly restored with dirt, sod/seed, and if necessary a landscape barrier. None of the parks contain any buildings. Each park contains open space, play fields, recreation equipment and landscaping/trees. The city will be retaining the same use (park) without changing the size of the public facility / park boundaries. The project involves purchasing and installing new recreational equipment within existing neighborhood parks.

Level of Environment Review Determination:
Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at §58.5:
58.34(a)(12)
58.35(a)(1)

Funding Information
<table>
<thead>
<tr>
<th>Grant Number</th>
<th>HUD Program</th>
<th>Program Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>B-18-MC-26-0011</td>
<td>Community Planning and Development (CPD)</td>
<td>Community Development Block Grants (CDBG) (Entitlement)</td>
</tr>
</tbody>
</table>

Estimated Total HUD Funded Amount: $900,000.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: $900,000.00

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

<table>
<thead>
<tr>
<th>Law, Authority, or Factor</th>
<th>Mitigation Measure or Condition</th>
<th>Comments on Completed Measures</th>
<th>Complete</th>
</tr>
</thead>
</table>

Determination:

- [ ] This categorically excluded activity/project converts to EXEMPT per Section 58.34(a)(12), because it does not require any mitigation for compliance with any listed statutes or authorities, nor requires any formal permit or license; **Funds may be committed and drawn down after certification of this part for this (now) EXEMPT project; OR**

- [ ] This categorically excluded activity/project cannot convert to Exempt status because one or more statutes or authorities listed at Section 58.5 requires formal consultation or mitigation. Complete consultation/mitigation protocol requirements, **publish NOI/RROF and obtain “Authority to Use Grant Funds” (HUD 7015.16) per Section 58.70 and 58.71 before committing or drawing down any funds; OR**

- [ ] This project is not categorically excluded OR, if originally categorically excluded, is now subject to a full Environmental Assessment according to Part 58 Subpart E due to extraordinary circumstances (Section 58.35(c)).

Preparer Signature: [Signature] Date: 31 MAY 2018

Name / Title / Organization: Joseph M. Murphy / ROYAL OAK

Responsible Entity Agency Official Signature: [Signature] Date: 06/11/18

Name / Title: MICHAEL C. FOURNIER, MAYOR
This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environment Review Record (ERR) for the activity / project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).
Environmental Review for Activity/Project that is Categorically Excluded Subject to Section 58.5 Pursuant to 24 CFR 58.35(a)

Project Information

Project Name: neighborhood-tree-planting-program

HEROS Number: 900000010056485

Responsible Entity (RE): ROYAL OAK, DEPUTY DIRECTOR COMMUNITY DEVELOPMENT ROYAL OAK MI, 48068

State / Local Identifier:

RE Preparer: Joseph M. Murphy

Certifying Office: Michael C. Fournier, Mayor

Grant Recipient (if different than Responsible Entity):

Point of Contact:

Consultant (if applicable):

Point of Contact:

Project Location: 211 Williams St, Royal Oak, MI 48067

Additional Location Information:
The tree planting program will focus on eligible CDBG target areas (LMI census track - block groups) throughout the city. PY2018 may focus on 1844-3, 1842-2, 1841-3 & 1841-4.

Direct Comments to:
Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:
In the past 10 years, many trees have been removed within the city's rights-of-way, between the back of curb and sidewalk OR within city parks due to disease or age. CDBG funds will be utilized to purchase and plant trees within the city's rights-of-way and parks. The size of the public right-of-way and/or public park will not change. The project's ground disturbing activities are limited strictly to twice the diameter needed to plant the root ball of individual trees.

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

Level of Environmental Review Determination:
Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at 58.5:
58.34(a)(12)
58.35(a)(1)

Determination:

- This categorically excluded activity/project converts to EXEMPT per Section 58.34(a)(12), because it does not require any mitigation for compliance with any listed statutes or authorities, nor requires any formal permit or license; Funds may be committed and drawn down after certification of this part for this (now) EXEMPT project; OR

- This categorically excluded activity/project cannot convert to Exempt status because one or more statutes or authorities listed at Section 58.5 requires formal consultation or mitigation. Complete consultation/mitigation protocol requirements, publish NOI/RROF and obtain “Authority to Use Grant Funds” (HUD 7015.16) per Section 58.70 and 58.71 before committing or drawing down any funds; OR

- This project is not categorically excluded OR, if originally categorically excluded, is now subject to a full Environmental Assessment according to Part 58 Subpart E due to extraordinary circumstances (Section 58.35(c)).

Approval Documents:
tree planting.pdf

7015.15 certified by Certifying Officer on:

7015.16 certified by Authorizing Officer on:
### Funding Information

<table>
<thead>
<tr>
<th>Grant / Project Identification Number</th>
<th>HUD Program</th>
<th>Program Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>B-18-MC-26-0011</td>
<td>Community Planning and Development (CPD)</td>
<td>Community Development Block Grants (CDBG) (Entitlement)</td>
</tr>
</tbody>
</table>

**Estimated Total HUD Funded, Assisted or Insured Amount:** $150,000.00

**Estimated Total Project Cost:** $150,000.00

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

<table>
<thead>
<tr>
<th>Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6</th>
<th>Are formal compliance steps or mitigation required?</th>
<th>Compliance determination (See Appendix A for source determinations)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Airport Hazards</strong> Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D</td>
<td>☐ Yes ☑ No</td>
<td>The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements.</td>
</tr>
<tr>
<td><strong>Coastal Barrier Resources Act</strong> Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]</td>
<td>☐ Yes ☑ No</td>
<td>This project is not located in a CBRS Unit. Therefore, this project has no potential to impact a CBRS Unit and is in compliance with the Coastal Barrier Resources Act.</td>
</tr>
<tr>
<td><strong>Flood Insurance</strong> Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]</td>
<td>☐ Yes ☑ No</td>
<td>Based on the project description the project includes no activities that would require further evaluation under this section. The project does not require flood insurance or is excepted from flood insurance. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance.</td>
</tr>
<tr>
<td>Regulation</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>-----------------------------------------------</td>
<td>-----</td>
<td>----</td>
</tr>
<tr>
<td><strong>Air Quality</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Clean Air Act, as amended, particularly section 176(c) &amp; (d); 40 CFR Parts 6, 51, 93</td>
<td>☐ Yes</td>
<td>☑ No</td>
</tr>
<tr>
<td><strong>Coastal Zone Management Act</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Coastal Zone Management Act, sections 307(c) &amp; (d)</td>
<td>☐ Yes</td>
<td>☑ No</td>
</tr>
<tr>
<td><strong>Contamination and Toxic Substances</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>24 CFR 50.3(i) &amp; 58.5(i)(2)]</td>
<td>☐ Yes</td>
<td>☑ No</td>
</tr>
<tr>
<td><strong>Endangered Species Act</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</td>
<td>☐ Yes</td>
<td>☑ No</td>
</tr>
<tr>
<td><strong>Explosive and Flammable Hazards</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Above-Ground Tanks)[24 CFR Part 51 Subpart C</td>
<td>☐ Yes</td>
<td>☑ No</td>
</tr>
<tr>
<td><strong>Farmlands Protection</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</td>
<td>☐ Yes</td>
<td>☑ No</td>
</tr>
<tr>
<td><strong>Floodplain Management</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</td>
<td>☐ Yes</td>
<td>☑ No</td>
</tr>
<tr>
<td><strong>Historic Preservation</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>National Historic Preservation Act of</td>
<td>☐ Yes</td>
<td>☑ No</td>
</tr>
</tbody>
</table>
Mitigation Measures and Conditions [40 CFR 1505.2(c)]:

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

<table>
<thead>
<tr>
<th>Law, Authority, or Factor</th>
<th>Mitigation Measure or Condition</th>
<th>Comments on Completed Measures</th>
<th>Complete</th>
</tr>
</thead>
</table>

06/12/2018 13:43  Page 5 of 30
Mitigation Plan

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

Airport Hazards

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

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

✓ No

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

Yes

Screen Summary

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

Supporting documentation

Airport Clear Zone documentation.pdf

Are formal compliance steps or mitigation required?

Yes

✓ No
Coastal Barrier Resources

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

1. **Is the project located in a CBRS Unit?**
   - ✔ No

   Document and upload map and documentation below.

   Yes

**Screen Summary**

**Compliance Determination**

This project is not located in a CBRS Unit. Therefore, this project has no potential to impact a CBRS Unit and is in compliance with the Coastal Barrier Resources Act.

**Supporting documentation**

*Coastal Barrier Resource System documentation.pdf*

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

- Yes

- ✔ No
Flood Insurance

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

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

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

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

Yes

Screen Summary

Compliance Determination
Based on the project description the project includes no activities that would require further evaluation under this section. The project does not require flood insurance or is excepted from flood insurance. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with Flood Insurance requirements.

Supporting documentation
Flood Insurance & Floodplain documentation.pdf

Are formal compliance steps or mitigation required?

Yes

✓ No
Air Quality

<table>
<thead>
<tr>
<th>General requirements</th>
<th>Legislation</th>
<th>Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Clean Air Act is administered by the U.S. Environmental Protection Agency (EPA), which sets national standards on ambient pollutants. In addition, the Clean Air Act is administered by States, which must develop State Implementation Plans (SIPs) to regulate their state air quality. Projects funded by HUD must demonstrate that they conform to the appropriate SIP.</td>
<td>Clean Air Act (42 USC 7401 et seq.) as amended particularly Section 176(c) and (d) (42 USC 7506(c) and (d))</td>
<td>40 CFR Parts 6, 51 and 93</td>
</tr>
</tbody>
</table>

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

   Yes

   ✓ No

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

Screen Summary

Compliance Determination

Based on the project description, this project includes no activities that would require further evaluation under the Clean Air Act. The project is in compliance with the Clean Air Act.

Supporting documentation

**Air Quality documentation.pdf**

Are formal compliance steps or mitigation required?

   Yes

   ✓ No
Coastal Zone Management Act

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

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

   Yes

   ✔ No

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

Screen Summary

Compliance Determination

This project is not located in or does not affect a Coastal Zone as defined in the state Coastal Management Plan. The project is in compliance with the Coastal Zone Management Act.

Supporting documentation

Coastal Zone Management documentation.pdf

Are formal compliance steps or mitigation required?

   Yes

   ✔ No
Contamination and Toxic Substances

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

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

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

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

- Yes

Explain:
existing city-owned public right-of-way between the back of curb and public sidewalk OR existing, dedicated city-owned parks

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

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

Supporting documentation

Hazardous Toxic Radio Sub documentation.pdf

Are formal compliance steps or mitigation required?

  Yes

  ✔ No
Endangered Species

<table>
<thead>
<tr>
<th>General requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Section 7 of the Endangered Species Act (ESA) mandates that federal agencies ensure that actions that they authorize, fund, or carry out shall not jeopardize the continued existence of federally listed plants and animals or result in the adverse modification or destruction of designated critical habitat. Where their actions may affect resources protected by the ESA, agencies must consult with the Fish and Wildlife Service and/or the National Marine Fisheries Service (“FWS” and “NMFS” or “the Services”).</td>
</tr>
</tbody>
</table>

**Classic Text**

Section 7 of the Endangered Species Act (ESA) mandates that federal agencies ensure that actions that they authorize, fund, or carry out shall not jeopardize the continued existence of federally listed plants and animals or result in the adverse modification or destruction of designated critical habitat. Where their actions may affect resources protected by the ESA, agencies must consult with the Fish and Wildlife Service and/or the National Marine Fisheries Service (“FWS” and “NMFS” or “the Services”).

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

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

     This selection is only appropriate if none of the activities involved in the project have potential to affect species or habitats. Examples of actions without potential to affect listed species may include: purchasing existing buildings, completing interior renovations to existing buildings, and replacing exterior paint or siding on existing buildings.

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

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

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

**Screen Summary**

**Compliance Determination**

This project will have No Effect on listed species due to the nature of the activities involved in the project. This project is in compliance with the Endangered Species Act.

**Supporting documentation**
Endangered Species documentation.pdf

Are formal compliance steps or mitigation required?
   Yes
   ✔ No
Explosive and Flammable Hazards

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

1. Is the proposed HUD-assisted project a hazardous facility (a facility that mainly stores, handles or processes flammable or combustible chemicals), i.e. bulk fuel storage facilities, refineries, etc.?

✓ No

Yes

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

✓ No

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

Yes

Screen Summary
Compliance Determination
Based on the project description the project includes no activities that would require further evaluation under this section. The project is in compliance with explosive and flammable hazard requirements.

Supporting documentation

Explosive and Flammable Operations documentation.pdf

Are formal compliance steps or mitigation required?

Yes

✓ No
Farmlands Protection

<table>
<thead>
<tr>
<th>General requirements</th>
<th>Legislation</th>
<th>Regulation</th>
</tr>
</thead>
</table>

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

   Yes
   ✓ No

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

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

**Screen Summary**

**Compliance Determination**

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

**Supporting documentation**

Farmlands Protection documentation.pdf

Are formal compliance steps or mitigation required?

   Yes
   ✓ No
Floodplain Management

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

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

- 55.12(c)(3)
- 55.12(c)(4)
- 55.12(c)(5)
- 55.12(c)(6)
- 55.12(c)(7)
- 55.12(c)(8)
- 55.12(c)(9)
- 55.12(c)(10)
- 55.12(c)(11)

✓ None of the above

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

Flood Risk Map 08-05-2015.pdf

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

Does your project occur in a floodplain?

✓ No

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

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

Supporting documentation

Flood Insurance & Floodplain documentation(1).pdf

Are formal compliance steps or mitigation required?
    Yes

✓ No
**Historic Preservation**

<table>
<thead>
<tr>
<th>General requirements</th>
<th>Legislation</th>
<th>Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Regulations under Section 106 of the National Historic Preservation Act (NHPA) require a consultative process to identify historic properties, assess project impacts on them, and avoid, minimize, or mitigate adverse effects</td>
<td>Section 106 of the National Historic Preservation Act (16 U.S.C. 470f)</td>
<td>36 CFR 800 “Protection of Historic Properties”</td>
</tr>
</tbody>
</table>

**Threshold**

Is Section 106 review required for your project?

- No, because the project consists solely of activities listed as exempt in a Programmatic Agreement (PA). (See the PA Database to find applicable PAs.)

- No, because the project consists solely of activities included in a No Potential to Cause Effects memo or other determination [36 CFR 800.3(a)(1)].

- Yes, because the project includes activities with potential to cause effects (direct or indirect).

**Step 1 – Initiate Consultation**

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

- State Historic Preservation Offer (SHPO)  In progress

- Advisory Council on Historic Preservation  Not Required

- Indian Tribes, including Tribal Historic Preservation Officers (THPOs) or Native Hawaiian Organizations (NHOs)
Other Consulting Parties

Describe the process of selecting consulting parties and initiating consultation here: Consultation with the Michigan SHPO is required under statute.

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

Step 2 – Identify and Evaluate Historic Properties

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

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

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

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

   Additional Notes:
   On May 23, 2018, staff mailed the Michigan SHPO documentation for its Section 106 Review for PY2018 activities.

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

   Yes
   ✓ No

Step 3 – Assess Effects of the Project on Historic Properties

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

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

✓ No Historic Properties Affected

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

Document reason for finding:

✓ No historic properties present.

Historic properties present, but project will have no effect upon them.

No Adverse Effect

Adverse Effect

Screen Summary

Compliance Determination
Based on Section 106 consultation there are No Historic Properties Affected because there are no historic properties present. The project is in compliance with Section 106.

Supporting documentation

PY2018 Section 106 MI SHPO submittal.pdf

Are formal compliance steps or mitigation required?

Yes

✓ No
Noise Abatement and Control

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

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

   - New construction for residential use
   - Rehabilitation of an existing residential property
   - A research demonstration project which does not result in new construction or reconstruction
   - An interstate land sales registration
   - Any timely emergency assistance under disaster assistance provision or appropriations which are provided to save lives, protect property, protect public health and safety, remove debris and wreckage, or assistance that has the effect of restoring facilities substantially as they existed prior to the disaster
   - None of the above

**Screen Summary**

**Compliance Determination**

Based on the project description, this project includes no activities that would require further evaluation under HUD's noise regulation. The project is in compliance with HUD’s Noise regulation.

**Supporting documentation**

[Noise Abatement documentation.pdf](#)

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

✓ No
Sole Source Aquifers

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

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

   Yes
   ✓ No

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

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

   < No
   ✓

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

   Yes

3. Does your region have a memorandum of understanding (MOU) or other working agreement with Environmental Protection Agency (EPA) for HUD projects impacting a sole source aquifer?

   Yes
Screen Summary
Compliance Determination
The project is not located on a sole source aquifer area. The project is in compliance with Sole Source Aquifer requirements.

Supporting documentation

Sole Source Aquifers documentation.pdf

Are formal compliance steps or mitigation required?
Yes

✓ No
Wetlands Protection

<table>
<thead>
<tr>
<th>General requirements</th>
<th>Legislation</th>
<th>Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Executive Order 11990 discourages direct or indirect support of new construction impacting wetlands wherever there is a practicable alternative. The Fish and Wildlife Service’s National Wetlands Inventory can be used as a primary screening tool, but observed or known wetlands not indicated on NWI maps must also be processed Off-site impacts that result in draining, impounding, or destroying wetlands must also be processed.</td>
<td>Executive Order 11990</td>
<td>24 CFR 55.20 can be used for general guidance regarding the 8 Step Process.</td>
</tr>
</tbody>
</table>

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

✓ No

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

Yes

Screen Summary
Compliance Determination
Based on the project description this project includes no activities that would require further evaluation under this section. The project is in compliance with Executive Order 11990.

Supporting documentation

Wetland documentation.pdf

Are formal compliance steps or mitigation required?

Yes

✓ No
Wild and Scenic Rivers Act

<table>
<thead>
<tr>
<th>General requirements</th>
<th>Legislation</th>
<th>Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>wild, scenic and recreational rivers designated as components or potential components of</td>
<td>7(b) and (c) (16 U.S.C. 1278(b) and (c))</td>
<td></td>
</tr>
<tr>
<td>the National Wild and Scenic Rivers System (NWSRS) from the effects of construction</td>
<td></td>
<td></td>
</tr>
<tr>
<td>or development.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

   ✓ No

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

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

**Screen Summary**

**Compliance Determination**

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

**Supporting documentation**

[Wild and Scenic Rivers documentation.pdf]

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

   Yes

   ✓ No
Environmental Justice

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

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

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

   Yes
   ✓ No

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

Screen Summary
Compliance Determination
No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898.

Supporting documentation

Environmental Justice documentation.pdf

Are formal compliance steps or mitigation required?

   Yes
   ✓ No
Environmental Review for Activity/Project that is Categorically Excluded Subject to Section 58.5 Pursuant to 24 CFR 58.35(a)

Project Information

Project Name: neighborhood-tree-planting-program
HEROS Number: 900000010056485

State / Local Identifier:
Project Location: 211 Williams St, Royal Oak, MI 48067

Additional Location Information:
The tree planting program will focus on eligible CDBG target areas (LMI census track - block groups) throughout the city. PY2018 may focus on 1844-3, 1842-2, 1841-3 & 1841-4.

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:
In the past 10 years, many trees have been removed within the city's rights-of-way, between the back of curb and sidewalk OR within city parks due to disease or age. CDBG funds will be utilized to purchase and plant trees within the city's rights-of-way and parks. The size of the public right-of-way and/or public park will not change. The project's ground disturbing activities are limited strictly to twice the diameter needed to plant the root ball of individual trees.

Level of Environment Review Determination:
Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at §58.5:
58.34(a)(12)
58.35(a)(1)

Funding Information

<table>
<thead>
<tr>
<th>Grant Number</th>
<th>HUD Program</th>
<th>Program Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>B-18-MC-26-0011</td>
<td>Community Planning and Development (CPD)</td>
<td>Community Development Block Grants (CDBG) (Entitlement)</td>
</tr>
</tbody>
</table>

Estimated Total HUD Funded Amount: $150,000.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: $150,000.00

Mitigation Measures and Conditions [CFR 1505.2(c)]:


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

<table>
<thead>
<tr>
<th>Law, Authority, or Factor</th>
<th>Mitigation Measure or Condition</th>
<th>Comments on Completed Measures</th>
<th>Complete</th>
</tr>
</thead>
</table>

**Determination:**

- This categorically excluded activity/project converts to **EXEMPT** per Section 58.34(a)(12), because it does not require any mitigation for compliance with any listed statutes or authorities, nor requires any formal permit or license; **Funds may be committed and drawn down after certification of this part** for this (now) EXEMPT project; OR

- This categorically excluded activity/project cannot convert to Exempt status because one or more statutes or authorities listed at Section 58.5 requires formal consultation or mitigation. Complete consultation/mitigation protocol requirements, **publish NOI/RROF and obtain “Authority to Use Grant Funds” (HUD 7015.16) per Section 58.70 and 58.71 before committing or drawing down any funds**; OR

- This project is not categorically excluded OR, if originally categorically excluded, is now subject to a full Environmental Assessment according to Part 58 Subpart E due to extraordinary circumstances (Section 58.35(c)).

**Preparer Signature:** [Signature]  
**Date:** 31 MAY 2018

**Name / Title / Organization:** Joseph M. Murphy / ROYAL OAK

**Responsible Entity Agency Official Signature:** [Signature]  
**Date:** 06/11/18

**Name / Title:** MICHAEL C. FOURNIER, MAYOR

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environment Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).
Environmental Review
for Activity/Project that is Exempt or
Categorically Excluded Not Subject to Section 58.5
Pursuant to 24 CFR 58.34(a) and 58.35(b)

Project Information

Project Name: program-administration

HEROS Number: 900000010056495

Responsible Entity (RE): ROYAL OAK, DEPUTY DIRECTOR COMMUNITY DEVELOPMENT ROYAL OAK MI, 48068

State / Local Identifier:

RE Preparer: Joseph M. Murphy

Grant Recipient (if different than Responsible Entity):

Point of Contact:

Consultant (if applicable):

Point of Contact:

Project Location: 211 S Williams St, Royal Oak, MI 48067

Additional Location Information: N/A

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:
Program administration funds continue to allow the proper oversight of the activities and comply with all HUD regulations

Level of Environmental Review Determination
Activity / Project is Exempt per 24 CFR 58.34(a):
58.34(a)(3)

Signature Page
program admin.pdf
Funding Information

<table>
<thead>
<tr>
<th>Grant / Project Identification Number</th>
<th>HUD Program</th>
<th>Program Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>B-18-MC-26-0011</td>
<td>Community Planning and Development (CPD)</td>
<td>Community Development Block Grants (CDBG) (Entitlement)</td>
</tr>
</tbody>
</table>

Estimated Total HUD Funded, Assisted or Insured Amount: $200,000.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: $200,000.00

Compliance with 24 CFR §50.4 & §58.6 Laws and Authorities

<table>
<thead>
<tr>
<th>Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4 &amp; §58.6</th>
<th>Are formal compliance steps or mitigation required?</th>
<th>Compliance determination (See Appendix A for source determinations)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Airport Runway Clear Zones and Clear Zones 24 CFR part 51</td>
<td>☐ Yes ☒ No</td>
<td>Based on the project description the project includes no activities that would require further evaluation under this section. The project is in compliance with Airport Runway Clear Zone requirements.</td>
</tr>
<tr>
<td>Coastal Barrier Resources Act Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]</td>
<td>☐ Yes ☒ No</td>
<td>This project is not located in a CBRS Unit. Therefore, this project has no potential to impact a CBRS Unit and is in compliance with the Coastal Barrier Resources Act.</td>
</tr>
<tr>
<td>Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]</td>
<td>☐ Yes ☒ No</td>
<td>Based on the project description the project includes no activities that would require further evaluation under this section. The project does not require flood insurance or is excepted from flood insurance. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance</td>
</tr>
</tbody>
</table>
Compliance Factors:
Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4 & §58.6

Are formal compliance steps or mitigation required?

Compliance determination (See Appendix A for source determinations)

<table>
<thead>
<tr>
<th>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 &amp; § 58.6</th>
</tr>
</thead>
<tbody>
<tr>
<td>Program (NFIP). The project is in compliance with Flood Insurance requirements.</td>
</tr>
</tbody>
</table>

Mitigation Measures and Conditions [CFR 40 1505.2(c)]: Summarized below are all mitigation measures adopted by the Responsible Entity to reduce, avoid or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

<table>
<thead>
<tr>
<th>Law, Authority, or Factor</th>
<th>Mitigation Measure or Condition</th>
<th>Comments on Completed Measures</th>
<th>Complete</th>
</tr>
</thead>
</table>

Mitigation Plan

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

Airport Runway Clear Zones

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

1. Does the project involve the sale or acquisition of developed property?
   ✔ No

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

Yes

Compliance Determination
Based on the project description the project includes no activities that would require further evaluation under this section. The project is in compliance with Airport Runway Clear Zone requirements.

Supporting documentation

Airport Clear Zone documentation.pdf

Are formal compliance steps or mitigation required?

✔ Yes
   ✔ No
Coastal Barrier Resources

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

1. Is the project located in a CBRS Unit?
   - No

   Document and upload map and documentation below.
   - Yes

Screen Summary

Compliance Determination
This project is not located in a CBRS Unit. Therefore, this project has no potential to impact a CBRS Unit and is in compliance with the Coastal Barrier Resources Act.

Supporting documentation

Coastal Barrier Resource System documentation.pdf

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

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

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

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

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

   Yes

**Screen Summary**

**Compliance Determination**

Based on the project description the project includes no activities that would require further evaluation under this section. The project does not require flood insurance or is excepted from flood insurance. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with Flood Insurance requirements.

**Supporting documentation**

[Flood Insurance & Floodplain documentation.pdf](Flood%20Insurance%20&%20Floodplain%20documentation.pdf)

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

- Yes
- No

Environmental Review for Activity/Project that is Exempt or Categorically Excluded Not Subject to Section 58.5 Pursuant to 24 CFR 58.34(a) and 58.35(b)

Project Information

Project Name: program-administration
HEROS Number: 900000010056495

State / Local Identifier:

Project Location: 211 S Williams St, Royal Oak, MI 48067

Additional Location Information:
N/A

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:
Program administration funds continue to allow the proper oversight of the activities and comply with all HUD regulations

Level of Environmental Review Determination
Activity / Project is Exempt per 24 CFR 58.34(a):
58.34(a)(3)

Funding Information

<table>
<thead>
<tr>
<th>Grant Number</th>
<th>HUD Program</th>
<th>Program Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>B-18-MC-26-0011</td>
<td>Community Planning and Development (CPD)</td>
<td>Community Development Block Grants (CDBG) (Entitlement)</td>
</tr>
</tbody>
</table>

Estimated Total HUD Funded Amount: $200,000.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: $200,000.00

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

<table>
<thead>
<tr>
<th>Law, Authority, or Factor</th>
<th>Mitigation Measure or Condition</th>
<th>Comments on Completed Measures</th>
<th>Complete</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Preparer Signature: ______________________ Date: 31 MAY 2018
Name / Title / Organization: Joseph M. Murphy / ROYAL OAK

Responsible Entity Agency Official Signature: ______________________ Date: 06/11/18
Name / Title: ______________________

MICHAEL C. FOURNIER, MAYOR

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