

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

Project Information

Project Name: 438-Dorothy-Day-Place

HEROS Number: 900000010425591

Responsible Entity (RE): ST. PAUL, DEPARTMENT OF PED ST. PAUL MN, 55102

RE Preparer: Kady Dadlez

State / Local Identifier:

Certifying Officer: Yasmine Robinson

Grant Recipient (if different than Responsible Entity):

Point of Contact:

Consultant (if applicable):

Point of Contact:

Project Location: 438 Dorothy Day Pl, Saint Paul, MN 55102

Additional Location Information:

N/A

Direct Comments to:

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

Mary Hall is an existing, historic building located at 438 Dorothy Day Place. Owned by Catholic Charities, the building was formerly used as temporary housing and overflow overnight shelter with dorm-style units. Aeon, the project proposer, has an option to purchase the property from Catholic Charities. The proposed project is a gut-rehabilitation project with a \$20M scope of work. It will be converted into studio and 1-bedroom apartments for rent. The scope of work includes a new roof, complete replacement of the plumbing, electrical and mechanical systems, new windows, elevator replacement, asbestos and lead remediation, apartment finishes, and new community room, property management and supportive services spaces. The building is eligible for the state and national register of historic places and is set to receive state historic and federal historic tax credits. See attachment for full scope of work proposed. The property at 438 Dorothy Day Place is zoned B5 downtown central business-service district on the edge of downtown Saint Paul. The corner property has 200 feet of frontage on Dorothy Day Place 75 feet of frontage on 9th Street West for a total lot area of 19,166 square feet (0.44 acres) and is currently occupied by a vacant 6-story residential structure, built in 1925 that has 68 efficiency units and 20 one-bedroom units built for residential use. The building was most recently used by Ramsey County to house homeless individuals showing symptoms of covid during the pandemic. Aeon submitted an initial funding application for the Mary Hall renovation project in 2021 and received in 2022 an award of 4% bonds and Low-Income Housing Tax Credits, along with an allocation of \$7.22M of Housing Infrastructure Bonds from Minnesota Housing. The project consists of 88 units of Permanent Supportive Housing to serve 44 High Priority Homeless (HPH) households and 44 Other Homeless Households; all units serve people at and below 30% AMI. The project has also been awarded 42 PBV vouchers including 25 Housing Choice Vouchers and 17 VASH vouchers (an estimated total voucher amount of \$503,220 to the project, in addition to the average tenant-paid rent portion of \$2,500 annually, for each of these 42 households). Additionally, the County has awarded it 46 Housing Support units through the regional CoC (a total of \$539,016 annually, in addition to the average tenant-paid rent portion of \$0). Service providers in the building include RADIAS, the Veterans Administration, and Aeon. Total project costs are \$34,317,951. The building has a long history of supporting extremely low-income individuals and providing services that are greatly needed in Saint Paul. Mary Hall represents a unique opportunity to create supportive housing in Saint Paul, particularly now when a high percentage of Minnesotans are experiencing housing instability. The project will provide housing and services for people coming out of the Coordinated Entry system, but who may still need case management, wellness support or other specialized services. Investing in this project aligns with the State, County and City's mission of providing safe and stable housing for all, particularly for its most vulnerable communities. Public Housing (HEROS) \$608,220 General Partner Cash \$100 Low Income Housing Tax Credits \$7,099,391 Federal historic proceeds \$3,954,306 State historic proceeds \$TBD Sales Tax Rebate \$170,000 Energy Rebates \$ 50,000 MHFA Housing Infrastructure Bonds \$7,22,000 Metropolitan Council LHIA \$1,159,000 City of Saint Paul Pooled TIF \$2,159,000 County and GO bonds \$ 1,485,310 Ramsey County ARPA \$2,390,936 County Levy \$435,132 Solar ITC \$36,464 Rethos SHTC Loan \$4,576,199 MN Housing Request - HIB Perm \$2,050,000 MN Housing Request - Not Bonds \$1,529,731

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

The purpose of the project is to rehabilitate the property to provide 88 units of deeply affordable supportive housing and services to individuals at or below 30% of area median income and coming out of the Coordinated Entry system, but who may still need case management, wellness support or other specialized services. Rental housing for extremely low-income individuals is in short supply in the region and finding housing for individuals in this income cohort is challenging. Investments in housing that are restricted to households at this income level is critical and the provision of services on site is often a necessity. The anticipated rents will be competitive in the area, leading to strong occupancy projections. There is a strong demand for comparable rental housing units in the market area. The building does not offer parking, but there is ample parking in the downtown area nearby, in addition to the public transportation options. The market study has indicated that the lack of parking is not a significant concern relative to the proposed use of the building. The addition of 88 units in the area adds to the city's supply of deeply affordable housing and provides critical resources for an often vulnerable and underserved population. If the project does not proceed, the housing need persists and grows over time. It is critical to address the need as opportunities arise.

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

The project site is located in a mixed-use area on the edge of downtown Saint Paul in close proximity to transit, jobs, services, and amenities. There are sidewalks along both street frontages with trees in the boulevard along Dorothy Day Place and pedestrian streetlighting along the west side of Dorothy Day Place. There is no vehicle access or curb cuts to the site. To the north and east are a wellness center and clinic on the grounds of the former St. Joseph's hospital. To the south and west are the Dorothy Day Opportunity Center, Dorothy Day Residence, and Higher Ground Facility with a 320-bed overnight shelter on floors 1-2 and 193 single room occupancy units on floors 3-5. The project site is within a couple blocks of major corridors and transit lines (Routes 21, 54, 61, 63, 64, 74, and 94) and within walking distance of the Green Line, a fixed-rail transit line that runs between downtown Saint Paul and Downtown Minneapolis, about 1/3 of a mile to the northeast. The site is within walking distance of city parks, a library, and museums (Landmark Center, History Center, Science Museum, Childrens Museum). There are many hospitals, banks, businesses, and services in the downtown area. The benefit of this project will be to provide more additional deeply affordable rental supportive housing units in a location that is adjacent to transit, jobs, and services. The creation of 88 additional units in the area adds to the city's supply of deeply affordable housing and provides critical resources for an often vulnerable and underserved population. If the project does not proceed, the housing need persists and grows over time. It is critical to address the need as opportunities arise.

Maps, photographs, and other documentation of project location and description:[0 438 Dorothy Day Pl - Google Maps.pdf](#)[APPROVED_42858_Part](#)[2_CoverSheet_SaintJosephsHospitalNursesHome_SaintPaul_MN.pdf](#)[Mary Hall Renovation Scope of Work.pdf](#)[MH BudgetMemo.pdf](#)[NRHP Eligibility Letter.pdf](#)**Determination:**

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

Approval Documents:

**7015.15 certified by Certifying Officer
on:**

**7015.16 certified by Authorizing Officer
on:**

Funding Information

Grant / Project Identification Number	HUD Program	Program Name	Funding Amount
PHA MN001	Public Housing	Project-Based Voucher Program	\$608,220.00

Estimated Total HUD Funded, Assisted or Insured Amount: \$608,220.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$34,317,951.00

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

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6	Are formal compliance steps or mitigation required?	Compliance determination (See Appendix A for source determinations)
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6		
Airport Hazards Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Using our GIS software, we were able to determine that the project site, 438 Dorothy Day Place, is not within 2,500 feet of either civilian airport in the Twin Cities. In addition, there are no military airports within 15,000 feet of the project site. The project is compliant with HUD's Airport Hazards policy.
Coastal Barrier Resources Act Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	We utilized the U.S. Fish and Wildlife Service's "Coastal Barrier Resources System Mapper" GIS application to determine whether the project site falls into a CBRS. According to the USFWS, the only CBRS found in Minnesota is the "John H. Chafee CBRS" in Duluth, Minnesota. Since the proposed HUD project is in the city of Saint Paul, Minnesota, approximately 160 miles south of the "John H. Chafee CBRS", it can be determined that there will be no effect. Therefore, this project is compliant with the Coastal Barrier Resources Act. 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 Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	According to the map generated by FEMA's National Flood Hazard Layer (NFHL) GIS application, it was determined that the project site is in FEMA FIRMette Map Panel Number: 27123C0103G. This panel has been in effect since 6/4/2010 and is labeled as "Zone X (Unshaded)". Since the proposed HUD-Assisted project occurs in an unshaded "Zone X" area, it can be determined that 438 Dorothy Day Place is neither in a Special Flood Hazard Area (SFHA) or an area of Moderate Risk.

		Flood insurance will not be necessary to serve as mitigation. Therefore, the project is compliant 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	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Based on the project description, this project includes no activities that would require further evaluation under the Clean Air Act. Therefore, the project is compliant with the Clean Air Act.
Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	In the state of Minnesota, the only coastal zone that is protected by the Coastal Zone Management Act (CZMA) is along the coast of Lake Superior. The project occurs in the City of Saint Paul and the proposed project site, is approximately 130 miles away from coastal areas protected in the Minnesota Department of Natural Resources coastal management plan. Therefore, the project is compliant with the Coastal Zone Management Act.
Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	SOIL IMPACTS: Black soil that may be the result of staining was observed in the soil column at GP-1 from zero feet to 6 feet, the termination depth of the borings. No odors or debris was observed. TOV readings <1.0 ppmv in the retrieved soil boring soil samples. Shallow soil impacts were detected at the site including the RCRA metal arsenic. The arsenic concentration of 29.1 mg/kg exceeded the MPCA direct contact risk criteria, the residential and commercial SRV of 9 mg/kg. Lead was also detected at an elevated concentration of 178 mg/kg, below the SRV of 200 mg/kg, but at a level that TCLP testing is recommended. The TCLP lead test passed, so this soil would not be considered a characteristic hazardous waste if excavated. Petroleum DRO was detected at a low concentration of 3.42 mg/kg, which did not exceed the MPCA soil reuse limit of

		<p>100 mg/kg. VOCs were not detected in the soil sample at concentrations above the laboratory reporting limits. SOIL VAPOR IMPACTS: PCE concentrations exceeded the residential 33x ISV at two (2) of the five (5) sub-slab soil vapor sample locations (SS-2 and SS-3). A VI AOC is established for this site which intersects the building. The soil vapor contaminant of concern is PCE. A second season of soil vapor sampling is required to determine the soil vapor AOC. Since PCE exceeds regulatory criteria in sub-slab soil vapor, an active vapor mitigation system is required to be installed in the site building. The following summary is from the recommendations section of the Phase II ESA. SOIL: No additional soil sampling is recommended to assess the extent of arsenic soil impacts since the area of impacted soil is small, and the site use is residential with no children present. Since soil excavation is planned along the west side of the building as part of site rehabilitation, JAVELIN [the consultant] recommends a Response Action Plan (RAP) be prepared and submitted to the MPCA for review and approval. In addition, based on review of the What's in My Neighborhood website for contamination, documents pertaining to the current state of environmental remediation were found. Beginning in early 2024, steps were made between the project developer and the Minnesota Pollution Control Agency (MPCA) to determine the characteristics of the site and the necessary mitigation/remediation steps. In the two documents posted within the WIMN page, it can be confirmed that there is the necessity for a vapor mitigation system and soil testing concluded several contaminant</p>
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		<p>measurements over required standards. An environmental covenant must be attached to the property record. The project proposer must continue to actively work with the MNPCA to ensure the proper and environmentally-sound redevelopment, mitigation, and remediation of the property, to be compliance with the Contamination and Toxic Substances requirements. No other site on the WIMN report poses any risk to the end users/project occupants. Finally, to ensure compliance with the Contamination and Toxic Substances Requirements, we visited the EPA's "NEPAssist" and Minnesota Pollution Control Agency's (MPCA) "What's in My Neighborhood" (WIMN) GIS web applications to identify sources of contamination within 1/2 mile of the proposed HUD-assisted project site. On NEPAssist, we found no Superfund sites within 1/2 mile of 438 Dorothy Day Pl. We found 7 Brownfield sites within 1/2 mile of the proposed project site. As evidence of due diligence, these sites will be listed below and the NEPAssist Report will be uploaded to HEROS. Lowering Johnson Lower Phalen Creek Nebraska and Arkwright Rail Waste Twin Cities Auto and Salvage W 7th Street Railroad Waste Management Due to the distance from the proposed project site to these NEPAssist Brownfield sites, these sites do not pose a risk to end users/project occupants.</p>
<p>Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The following species were identified in the IPaC species list generated on August 28, 2024: Northern Long-eared Bat, Tricolored Bat, Whopping Crane, Higgins Eye (pearlymussel), Salamander Mussel, Rusty Patched Bumble Bee, and Monarch Butterfly. Project activities will have no effect on the Northern Long-eared Bat. This determination can</p>

		<p>be made because project activities do not involve clearing or disturbing suitable habitat, no activity in or near the entrance to cave or mine, nor mining, deep excavation, or underground work within 0.25 miles of a cave or mine, nor construction of wind turbines or demolition or reconstruction of human made structures known to be used by bats. Project activities will have no effect on the Tricolored Bat. This determination can be made because project activities do not involve clearing or disturbing suitable habitat, no activity in or near the entrance to cave or mine, nor mining, deep excavation, or underground work within 0.25 miles of a cave or mine, nor construction of wind turbines or demolition or reconstruction of human made structures known to be used by bats. Project activities will have no effect on the Whooping Crane. This determination can be made because the Whooping Crane is designated as a "non-essential" experimental population in Minnesota. Consultation under Section 7(a)(2) of the Endangered Species Act is only required if project activities will occur within a National Wildlife Refuge or National Park. Since proposed project activity will occur on land outside of a National Wildlife Refuge or National Park, we are not required to consult for this species. Project activities will have no effect on the Higgins Eye (pearly mussel). This determination can be made because project activities do not involve habitat loss, degradation, or introduction of exotic species including Zebra mussels, which are the major threats to the survival of the Higgins eye mussel. Project activities will have no effect on the Salamander Mussel. This determination can be made because the</p>
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		<p>species, as of September 1st, 2023, has been proposed for listing as an endangered species under the Endangered Species Act of 1973. As a result, this species is not yet protected by the Act. Proposed Critical Habitat for the Salamander Mussel exists in Chisago and Washington County, Minnesota, specifically in the St. Croix River. The proposed project activity will not impact known habitat. Project activities will have no effect on the Rusty Patched Bumble Bee. This determination can be made because project activities do not involve habitat loss, degradation, or introduction of pathogens or exposure to insecticides or fungicides, which are suspected to be the major threats to the species along with non-native and managed bees, the effects of climate change, and small population biology. The Monarch Butterfly is a candidate species and not yet listed or proposed for listing. There are currently no section 7 requirements for candidate species. Project activities will not impact known habitat. Project activities do not involve construction of Communication Towers (radio, television, cellular, and microwave towers), Transmission Lines (power lines or poles, particularly those with uninsulated or unguarded electrical currents), or Wind Turbines. Therefore, there will be no effect on migratory birds. In addition, there are no critical habitats for the listed species within the project area under the USFWS jurisdiction. The project site is in a fully urbanized area and there is no habitat present in the project site for the species on the IPaC list. The proposed project activities will not jeopardize the continued existence of any listed species. Therefore, the project is compliant with Section 7 requirements.</p>
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<p>Explosive and Flammable Hazards Above-Ground Tanks)[24 CFR Part 51 Subpart C</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>There are four aboveground storage tanks within a mile of the project site. All are an acceptable separation distance from the project site. See attached summary of information about the tanks along with the MPCA information and the ASD calculation results. The Separation Distance from the project is acceptable. The project is in compliance with explosive and flammable hazard requirements.</p>
<p>Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is compliant with the Farmland Protection Policy Act.</p>
<p>Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>This project does not occur in the FFRMS floodplain. The project is in compliance with Executive Orders 11988 and 13690.</p>
<p>Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>The Saint Joseph's Hospital Nurses Home (Mary Hall) at 438 Dorothy Day Place, St. Paul, (RA-SPC-05418) has been determined eligible for listing in the National Register of Historic Places (NRHP). In order for the State Historic Preservation Office (SHPO) to make a determination that the proposed project will not adversely affect the historic property, the rehabilitation must be designed in conformance with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Standards). The proposed federal undertaking, the rehabilitation of this historic building, is pursuing certification under the Federal Historic Preservation Tax Incentives Program and that the Part II Description of Rehabilitation has been approved, with conditions, by the SHPO. Therefore, because participation in the federal tax program will ensure that the rehabilitation is designed in conformance with the Standards, the SHPO provided a determination that</p>

		<p>this project will have no adverse effect on the historic property contingent upon the work being completed per the approved Part II application. If for any reason the developer does not continue to pursue the federal historic preservation tax credits, consultation with the SHPO will need to be re-initiated in order to complete its review, pursuant to Section 106 of the National Historic Preservation Act. The following conditions for the rehabilitation were established as part of the NRHP eligibility: CORRIDORS: Historic dorm room door openings and transoms must be retained to preserve the historic character of the residential area of the buildings. Doors openings may be infilled, but historic trim must be retained. New trim should match the existing or historic where extant. HVAC: New systems must be installed in a manner that does not impact the historic character and features. Corridor ceilings must not be lowered below door or transoms frames, and unit ceilings must not be lowered below windows. Ceilings should be kept at or higher than existing ACT ceilings. The project manager is responsible for ensuring these mitigation measures (conditions for rehabilitation related to corridors and HVAC) are implemented in the project and providing documentation of implementation. These mitigation measures will be incorporated into the city's Pooled TIF Loan Agreement with the developer and implementation of the measures documented after inspections following completion of the rehabilitation of the building. Documentation of the implementation of mitigation measures must be provided to the environmental officer and entered into HEROS. The</p>
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		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	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	A Noise Assessment was conducted. There are 2 airports, 7 railways, and 18 roadways in proximity to the project site. The noise level is normally unacceptable: 75.0 dB. See noise analysis uploaded to HEROS. The developer plans to install new window systems that will provide noise attenuation. A STraCAT analysis was completed showing that an STC rating of 34.92 is achieved with materials specified for the project (33 STC rating strongly encouraged). The STraCAT analysis has been uploaded to HEROS. The project is in compliance with HUD's Noise regulation without mitigation.
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The EPA has an online GIS application called "Sole Source Aquifers" that shows the location of SSA's across the country. The only SSA in the state of Minnesota is encompasses Lake Mille Lacs. The project site is approximately 80 miles away from the southernmost point of the Mille Lacs SSA. Since the proposed project site is not on a SSA, the project is in compliance with Sole Source Aquifer requirements.
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	After utilizing our GIS software, we were able to determine that the project site, is not located near any NWSRS. Therefore, the project is compliant the Wild and Scenic Rivers Act. T
HUD HOUSING ENVIRONMENTAL STANDARDS		
ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898.

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

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

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor Adverse Impact – May require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement.

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	1	The project is consistent with zoning and the city's comprehensive plan. The Board of Zoning Appeals approved a variance to allow the supportive rental housing use (variance of the separation distance requirement from other supportive housing facilities). The project site is in an area identified as Downtown in the Land Use Plan, a chapter of the Saint Paul Comprehensive Plan. The 2040 Comprehensive Plan identifies the site as being in proximity to the Rice Park Urban Village Neighborhood Node and the Fitzgerald Park Urban Village Neighborhood Node. The Neighborhood Node designation is based on locations planned for higher density. The Land Use Plan calls for household and employment growth over the next two decades to be focused on Downtown, Mixed-Use areas and Neighborhood Nodes, creating compact urban development in areas with a high level of services and amenities. Policy LU-1 of the Land Use Plan encourages transit-supportive density and directing the majority of growth to areas with the highest existing or planned transit capacity. Goal 6 of the Housing Plan calls for improved access for affordable housing. Policy H18 calls for fostering the preservation and production of deeply affordable rental housing (housing affordable to those at 30% or less of AMI), supportive	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		housing and housing for people experiencing homelessness. Policy H-37 calls for encouraging the development of affordable housing in areas well-served by transit and/or in proximity to employment centers. Finally, Policy H45 calls for supporting the preservation and maintenance of historic housing stock as an affordable housing option. The Downtown Development Strategy supports housing affordability and calls for ten percent of units assisted with City funds be affordable to a family a family at 30% of the metro area median income.	
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2	The project site is flat and has been previously developed for multifamily residential use. This is an existing building. No change to drainage/runoff is anticipated. The property is served by existing city storm sewer.	
Hazards and Nuisances including Site Safety and Site-Generated Noise	2	The project site is unlikely to be affected by natural hazards, given its geographic location, nor pollution generators like heavy industry, cement plants, or oil refineries as these are not in proximity to the site. The project itself is not a noise-generating facility, nor will it be affected by nuisances such as gas, smoke, fumes, odors, vibration, glare from lighting from industrial or commercial uses or parking lots, vacant/boarded-up buildings, unsightly land uses, abandoned vehicles, or vermin infestation. Although it has been vacant recently, this building has a long history of the same/similar uses. Its renovation and use as a supportive housing facility will not cause adverse impacts.	
SOCIOECONOMIC			
Employment and Income Patterns	2	The project will provide some temporary employment during the rehabilitation period and permanent positions for staff providing on-site security and supportive services as part of the facility's operations. The building has been vacant for a couple of years and will	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		therefore not displace any existing employees.	
Demographic Character Changes / Displacement	2	Because the building is vacant, this project will not displace any current tenants or residents. The project site is located in the Downtown neighborhood. Demographic information indicates the population is about 70% people of color and 30% white. In terms of income, 25% of households earn less than \$35,000 per year and 35% of households earn more than \$100,000 per year; about 40% of households earn between \$35,000 and \$100,000 annually. About 42% of all households are cost burdened. 46% of renter households are cost burdened. The area is moderately well-served by transit. The project will not significantly alter the racial, ethnic, or income segregation of the area's housing. Full breakdown of demographic data has been uploaded to HEROS.	
Environmental Justice EA Factor	2	The project will not have disproportionately high and adverse human health or environmental effects on minority and low-income populations. Therefore, no further evaluation is needed under this section The project is in compliance with Executive Order 12898.	
COMMUNITY FACILITIES AND SERVICES			
Educational and Cultural Facilities (Access and Capacity)	2	The proposed project will result in the rehabilitation of 88 units of rental housing (79 efficiencies and 9 1-bedrooms). Residents will typically be adults This represents a modest increase population overall and no increase in the number of school-aged children. Therefore, there will be no increased demand on public education facilities for children. Residents of the building will have access to a variety of nearby educational and cultural facilities including the public library, museums, places of worship, and post-secondary educational institutions. These are all within walking distance.	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Commercial Facilities (Access and Proximity)	2	The project site is on the edge of downtown and within walking distance of banks, a credit union, food markets and delis, shops, and restaurants. The project site is less than half a mile from a city library and park. There is adequate and convenient access to retail services. The project will not adversely impact or displace existing retail or commercial services. The project will provide more housing in a location that is in proximity to transit, jobs, and services. For retail services not available within walking distance of the project site, there is adequate public transportation (bus and light rail transit) in proximity to the site. The project site is near Interstates 94 and 35. See uploaded information from Walk Score, which includes information on transit.	
Health Care / Social Services (Access and Capacity)	2	The project involves rehabilitation of an existing residential structure. This may bring additional residents to the area and result in a modest increase in the number of people needing healthcare services. The potential population rise will not increase the need for area health care services beyond current capacities in the fully urbanized area. There are several hospitals and clinics within walking distance of the project area that are also accessible by existing public transportation including Regions Hospital and United Hospital. In addition, the former St. Joseph's hospital adjacent to the site is a wellness hub providing services. Existing emergency police and fire services are adequate to serve the project. There is a fire station about a half a mile from the site and a police station within a mile. Because the project will provide deeply affordable housing, there may be a greater need for social services from this population than the population at large. The building will have on-site service providers and as noted, the site is located adjacent to hospitals and clinics. Like health care services, there are	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		social services within proximity to the site and services accessible by public transportation. Existing services in the fully urbanized area are accessible and adequate to meet the new and increased demand for services generated by the project. See uploaded information from Walk Score.	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	2	The project site is in a fully developed urban area with the capacity to handle the types and amount of waste/recycling anticipated to be generated by the operation of an apartment building. The waste generated by the completed project will not exceed the capacity of the regional waste system.	
Waste Water and Sanitary Sewers (Feasibility and Capacity)	2	The existing city sanitary sewer system has the capacity to serve the existing building. No increase in capacity of the system is needed for the project. The City's storm sewer has adequate capacity as well and is separated from its sanitary sewer.	
Water Supply (Feasibility and Capacity)	2	Estimated daily water use for the project is about 9,000 gallons (88 residents x 100 gallons each). Saint Paul Regional Water Services, a municipal water provider, will provide water to the project. There is adequate capacity in the system to serve the project site with safe water. The project will not result in a significant consumption of the community's available water supply nor result in a significant deterioration of water quality.	
Public Safety - Police, Fire and Emergency Medical	2	The project site is on the edge of downtown. Existing emergency police and fire services are adequate to serve the project. There is a fire station about a half a mile from the site and a police station within a mile. There is a fire hydrant across the street from the project site on the west side of Dorothy Day Place and around the corner at the 9th & Exchange intersection. The modest increase in density will result in a modest increase in demand for services. In addition, there will be on-site security and support services for residents.	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Parks, Open Space and Recreation (Access and Capacity)	2	The project site is within walking distance of Rice Park, Landmark Plaza, Cathedral Hill Park, and Summit Park. Parks offer walking, benches, and open space. The project site is about a half a mile from the Central Library. The project site is about a mile from Martin Luther King Jr. Recreation Center. The project site is within walking distance of the river as well. The project will not overload existing open space, recreational, or cultural facilities. All facilities are accessible by sidewalk. See uploaded information from Walk Score.	
Transportation and Accessibility (Access and Capacity)	2	The project site is served by adequate public transportation services (existing bus and light rail transit). Interstates 94 and 35 are adjacent to the project site. Retail, recreation, and library services are within walking distance of the project site. There are sidewalks throughout downtown and traffic signals to allow safe crossing of major downtown streets. The project will not cause an adverse impact on the local or regional transportation system or reduce the level of service of roadways. Existing transportation facilities and services are adequate to meet the needs of the project.	
NATURAL FEATURES			
Unique Natural Features /Water Resources	2	There are no unique or locally important natural features on or near the site, therefore there will be no adverse impacts to unique natural features. The project does not involve the use of ground or surface waters or wetlands. No adverse impacts to wetlands will result from the project.	
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	2	The project involves rehabilitation of an existing residential building in a fully urbanized area and will not adversely affect vegetation or wildlife. No adverse impacts to vegetation or wildlife are anticipated.	
Other Factors 1			
Other Factors 2			
CLIMATE AND ENERGY			

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Climate Change	2	<p>According to the FEMA National Risk Index created for Census Tract 27123034204, uploaded to HEROS, the national risk index is stated as relatively low, with a rating of 31.86. In addition, the expected annual loss is relatively low, 30.1, the social vulnerability is relatively moderate, 51.5, and the community resilience is very high, 93.3. According to the report the natural hazards that may impact the project area include cold waves, heat waves, hail, strong winds, tornados, winter weather, and landslides. The project will install a new 4 pipe heating and cooling system to provide comfortable living conditions during cold waves and heat waves. The project site is on the edge of downtown and in an area with close proximity to public transportation, shops, and services, which will help reduce energy consumed/greenhouse gases for transportation as residents will not have to rely on automobiles for commuting and errands. Use of public transit is a viable option given the proximity to bus, BRT, and LRT options in the area.</p>	
Energy Efficiency	2	<p>The project must comply with the city's Sustainable Building Policy, the details of which are included in the document uploaded for this review item. In addition to compliance with the policy, Saint Paul has an "Overlay" that includes mandatory requirements that must be met. These items relate to predicted energy use, potable water, predicted water use for landscaping, recycling of construction/demolition debris to avoid landfills, ventilation, stormwater management, predicted greenhouse gas emissions, and annual reporting of actual energy data. The project will install Energy Star appliances, lighting fixtures, or heating, cooling, and hot water systems. The project site is located in an area with close proximity to public transportation, shops, and services, which will help reduce energy consumed for</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		transportation as residents will not have to rely on automobiles for commuting and errands.	

Supporting documentation

[Walk Score Information2.pdf](#)

[Walk Score Information.pdf](#)

[Sustainable Building Policy.pdf](#)

[National Risk Index Report.pdf](#)

[Mary Hall Unemployment by Census Tract.pdf](#)

[Mary Hall Median Household Income by Census Tract.pdf](#)

[Mary Hall Access to Community Facilities.pdf](#)

[Downtown MN Compass Demographics.pdf](#)

[CapitolRiver Council Letter of Support.pdf](#)

Additional Studies Performed:

None.

Field Inspection [Optional]: Date and completed

by:

Kady Dadlez

[APPROVED 42858 Part](#)

[2_CoverSheet_SaintJosephsHospitalNursesHome_SaintPaul_MN.pdf](#)

[Mary Hall Renovation Scope of Work.pdf](#)

[MH BudgetMemo.pdf](#)

[NRHP Eligibility Letter.pdf](#)

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

Sarah Zorn, PED Housing Supervisor, Saint Paul Planning and Economic Development

Hannah Chong, Senior Project Manager, Saint Paul Planning and Economic

Development

List of Permits Obtained:

Variance from the Saint Paul Board of Zoning Appeals. Building permits from the City of Saint Paul will need to be obtained.

Public Outreach [24 CFR 58.43]:

The local neighborhood organization, the CapitolRiver Council provided a letter of support for the project. The letter has been uploaded to HEROS. The dissemination list has been uploaded to HEROS.

[FONSI and NOI RROF Notices.pdf](#)
[Dissemination List for FONSI Notice.pdf](#)
[CapitolRIver Council Letter of Support\(1\).pdf](#)

Cumulative Impact Analysis [24 CFR 58.32]:

The project involves rehabilitation of an existing residential structure for deeply affordable supportive rental housing. As the building has been used for the same or similar uses in the past, there are no adverse impacts anticipated from the reuse of the building. The developer is well aware of the needs of the population they serve and will work to ensure the safety and security of tenants and those in the immediate surrounding area. Cumulative impacts to the environment include the solid waste generated during rehabilitation and operation of the new building. An increase in dwelling units in the area is anticipated and supported by the 2040 Comprehensive Plan.

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

No alternatives were considered.

No Action Alternative [24 CFR 58.40(e)]

Saint Paul has a housing shortage in general and a deeply affordable housing shortage in particular. The no action alternative would result in no investment in the property to provide 88 units of deeply affordable housing. The no action alternative was not chosen because it would have resulted in the building remaining vacant and 88 individuals and small households continuing to be in need of affordable, decent housing options with services tailored to their needs.

Summary of Findings and Conclusions:

The project involves rehabilitation of an existing residential building to provide deeply affordable supportive rental housing. No adverse environmental effects were identified in the environmental assessment process, though mitigation measures must be implemented to ensure there are no adverse effects to the contamination and toxic substances and historic properties laws and authorities as detailed in the environmental review. In addition, the noise level falls into a normally unacceptable category (75). Attenuation is strongly encouraged for rehabilitation projects. The developer provided STraCAT analysis results showing that sound attenuation will be achieved with the installation of new window systems specified for the project (STC rating of 34.92 achieved; STC rating of 33 strongly encouraged).

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

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

Law, Authority, or Factor	Mitigation Measure or Condition	Comments on Completed Measures	Mitigation Plan	Complete
Contamination and Toxic Substances	<p>The Phase II ESA testing identified the levels of contamination at the site. There were several auto repair shops and service stations nearby. Soil vapor testing was conducted and found levels that exceeded the requirements. Based on these results a Vapor Mitigation Response Action Plan was developed and incorporated into the project construction plans. It calls for 17 depressurized suction points to be installed on the main level connected by piping and roof fans. See attached for the Vapor Mitigation Response Action Plan. Adverse environmental impacts can be mitigated. With mitigation, identified in the mitigation section of this review, the project will be in compliance with contamination and toxic substances requirements.</p> <p>The project manager is responsible for ensuring this mitigation measure (Vapor Mitigation Response Action Plan) are implemented in the project and providing</p>	N/A	<p>The project manager is responsible for ensuring this mitigation measure ((Vapor Mitigation Response Action Plan) is implemented in the project and providing documentation of implementation. This mitigation measure will be incorporated into the city's Pooled TIF Loan Agreement with the developer and implementation of the measures documented after inspections following completion of the rehabilitation of the building. Documentation</p>	

	<p>documentation of implementation. This mitigation measure will be incorporated into the city's Pooled TIF Loan Agreement with the developer and implementation of the measures documented after inspections following completion of the rehabilitation of the building. Documentation of the implementation of mitigation measures must be provided to the environmental officer and entered into HEROS. The following summary is from the conclusions section of the Phase II ESA.</p>		<p>of the implementation of mitigation measures must be provided to the environmental officer and entered into HEROS.</p>	
<p>Historic Preservation</p>	<p>The Saint Joseph's Hospital Nurses Home (Mary Hall) at 438 Dorothy Day Place, St. Paul, (RA-SPC-05418) has been determined eligible for listing in the National Register of Historic Places (NRHP). In order for the State Historic Preservation Office (SHPO) to make a determination that the proposed project will not adversely affect the historic property, the rehabilitation must be designed in conformance with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic</p>	<p>N/A</p>	<p>The project manager is responsible for ensuring these mitigation measure (conditions for rehabilitation related to corridors and HVAC) are implemented in the project and providing documentation of implementation. These mitigation measures will be incorporated</p>	

	<p>Buildings (Standards). The proposed federal undertaking, the rehabilitation of this historic building, is pursuing certification under the Federal Historic Preservation Tax Incentives Program and that the Part II Description of Rehabilitation has been approved, with conditions, by the SHPO. Therefore, because participation in the federal tax program will ensure that the rehabilitation is designed in conformance with the Standards, the SHPO provided a determination that this project will have no adverse effect on the historic property contingent upon the work being completed per the approved Part II application. If for any reason the developer does not continue to pursue the federal historic preservation tax credits, consultation with the SHPO will need to be re-initiated in order to complete its review, pursuant to Section 106 of the National Historic Preservation Act. The following conditions for the rehabilitation were established as part of the NRHP eligibility: CORRIDORS: Historic dorm room door openings and transoms must be retained to preserve the historic character of the residential area of the buildings. Doors openings may be infilled, but historic trim must be retained. New trim should</p>		<p>into the city's Pooled TIF Loan Agreement with the developer and implementation of the measures documented after inspections following completion of the rehabilitation of the building. Documentation of the implementation of mitigation measures must be provided to the environmental officer and entered into HEROS.</p>	
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	<p>match the existing or historic where extant. HVAC: New systems must be installed in a manner that does not impact the historic character and features. Corridor ceilings must not be lowered below door or transoms frames, and unit ceilings must not be lowered below windows. Ceilings should be kept at or higher than existing ACT ceilings. The project manager is responsible for ensuring these mitigation measure (conditions for rehabilitation related to corridors and HVAC) are implemented in the project and providing documentation of implementation. These mitigation measures will be incorporated into the city's Pooled TIF Loan Agreement with the developer and implementation of the measures documented after inspections following completion of the rehabilitation of the building. Documentation of the implementation of mitigation measures must be provided to the environmental officer and entered into HEROS.</p>			
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Project Mitigation Plan

The project manager is responsible for ensuring these mitigation measures are implemented in the project and providing documentation of implementation. These mitigation measures will be incorporated into the city's Pooled TIF Loan Agreement with the developer and implementation of the measures documented after inspections following completion of the rehabilitation of the building. Documentation of the implementation of mitigation measures must be provided to the environmental officer and entered into HEROS.

Supporting documentation on completed measures

APPENDIX A: Related Federal Laws and Authorities

Airport Hazards

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

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

✓ No

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

Yes

Screen Summary

Compliance Determination

Using our GIS software, we were able to determine that the project site, 438 Dorothy Day Place, is not within 2,500 feet of either civilian airport in the Twin Cities. In addition, there are no military airports within 15,000 feet of the project site. The project is compliant with HUD's Airport Hazards policy.

Supporting documentation

[\(1\) Airport Hazards Compliance.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Coastal Barrier Resources

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

1. Is the project located in a CBRS Unit?

No

Document and upload map and documentation below.

Yes

Compliance Determination

We utilized the U.S. Fish and Wildlife Service's "Coastal Barrier Resources System Mapper" GIS application to determine whether the project site falls into a CBRS. According to the USFWS, the only CBRS found in Minnesota is the "John H. Chafee CBRS" in Duluth, Minnesota. Since the proposed HUD project is in the city of Saint Paul, Minnesota, approximately 160 miles south of the "John H. Chafee CBRS", it can be determined that there will be no effect. Therefore, this project is compliant with the Coastal Barrier Resources Act. 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

[2 Coastal Barriers Map.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Flood Insurance

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

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

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

Yes

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

[\(3\) Flood Insurance Compliance.pdf](#)

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

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

No

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

Yes

4. While flood insurance is not mandatory for this project, HUD strongly recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). Will flood insurance be required as a mitigation measure or condition?

Yes

✓ No

Screen Summary

Compliance Determination

According to the map generated by FEMA's National Flood Hazard Layer (NFHL) GIS application, it was determined that the project site is in FEMA FIRMette Map Panel Number: 27123C0103G. This panel has been in effect since 6/4/2010 and is labeled as "Zone X (Unshaded)". Since the proposed HUD-Assisted project occurs in an unshaded "Zone X" area, it can be determined that 438 Dorothy Day Place is neither in a Special Flood Hazard Area (SFHA) or an area of Moderate Risk. Flood insurance will not be necessary to serve as mitigation. Therefore, the project is compliant with Flood Insurance requirements.

Supporting documentation

[\(3\) Flood Insurance Compliance\(1\).pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Air Quality

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

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

Yes

No

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. Therefore, the project is compliant with the Clean Air Act.

Supporting documentation

[4 Air Quality Compliance.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Coastal Zone Management Act

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

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

Yes

✓ No

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

Screen Summary

Compliance Determination

In the state of Minnesota, the only coastal zone that is protected by the Coastal Zone Management Act (CZMA) is along the coast of Lake Superior. The project occurs in the City of Saint Paul and the proposed project site, is approximately 130 miles away from coastal areas protected in the Minnesota Department of Natural Resources coastal management plan. Therefore, the project is compliant with the Coastal Zone Management Act.

Supporting documentation

[5 Coastal Zone Management.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Contamination and Toxic Substances

General Requirements	Legislation	Regulations
It is HUD policy that all properties that are being proposed for use in HUD programs be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of the occupants or conflict with the intended utilization of the property.		24 CFR 58.5(i)(2) 24 CFR 50.3(i)
Reference		
https://www.onecpd.info/environmental-review/site-contamination		

1. How was site contamination evaluated?* Select all that apply.

- ✓ ASTM Phase I ESA
- ✓ ASTM Phase II ESA

Remediation or clean-up plan

ASTM Vapor Encroachment Screening.

None of the above

* HUD regulations at 24 CFR § 58.5(i)(2)(ii) require that the environmental review for multifamily housing with five or more dwelling units or non-residential property include the evaluation of previous uses of the site or other evidence of contamination on or near the site.

For acquisition and new construction of multifamily and nonresidential properties HUD strongly advises the review include an ASTM Phase I Environmental Site Assessment (ESA) to meet real estate transaction standards of due diligence and to help ensure compliance with HUD's toxic policy at 24 CFR §58.5(i) and 24 CFR §50.3(i). Also note that some HUD programs require an ASTM Phase I ESA.

2. Were any on-site or nearby toxic, hazardous, or radioactive substances* (excluding radon) 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?)

Provide a map or other documentation of absence or presence of contamination** and explain evaluation of site contamination in the Screen Summary at the bottom of this screen.

No

Explain:

✓ Yes

* This question covers the presence of radioactive substances excluding radon. Radon is addressed in the Radon Exempt Question.

** Utilize EPA's Enviromapper, NEPAssist, or state/tribal databases to identify nearby dumps, junk yards, landfills, hazardous waste sites, and industrial sites, including EPA National Priorities List Sites (Superfund sites), CERCLA or state-equivalent sites, RCRA Corrective Action sites with release(s) or suspected release(s) requiring clean-up action and/or further investigation. Additional supporting documentation may include other inspections and reports.

3. Evaluate the building(s) for radon. Do all buildings meet any of the exemptions* from having to consider radon in the contamination analysis listed in CPD Notice [CPD-23-103](#)?

Yes

Explain:

✓ No

* Notes:

- Buildings with no enclosed areas having ground contact.
- Buildings containing crawlspaces, utility tunnels, or parking garages would not be exempt, however buildings built on piers would be exempt, provided that there is open air between the lowest floor of the building and the ground.
- Buildings that are not residential and will not be occupied for more than 4 hours per day.
- Buildings with existing radon mitigation systems - document radon levels are below 4 pCi/L with test results dated within two years of submitting the application for HUD assistance and document the system includes an ongoing maintenance plan that includes periodic testing to ensure the system continues to meet the current EPA recommended levels. If the project does not require an application, document test results dated within two years of the date the environmental review is certified. Refer to program office guidance to ensure compliance with program requirements.
- Buildings tested within five years of the submission of application for HUD assistance: test results document indoor radon levels are below current the EPA's recommended action levels of 4.0 pCi/L. For buildings with test data older than five years, any new environmental review must include a consideration of radon using one of the methods in Section A below.

4. Is the proposed project new construction or substantial rehabilitation where testing will be conducted but cannot yet occur because building construction has not been completed?

Yes

Compliance with this section is conditioned on post-construction testing being conducted, followed by mitigation, if needed. Radon test results, along with any needed mitigation plan, must be uploaded to the mitigation section within this screen.

✓ No

5. Was radon testing or a scientific data review conducted that provided a radon concentration level in pCi/L?

✓ Yes

No

If no testing was conducted and a review of science-based data offered a lack of science-based data for the project site, then document and upload the steps taken to look for documented test results and science-based data as well as the basis for the conclusion that testing would be infeasible or impracticable.

Explain:

File Upload:

Based on the response, the review is in compliance with this section. Continue to the Screen Summary at the bottom of this screen.

Non-radon contamination was found in a previous question.

6. How was radon data collected?

All buildings involved were tested for radon

✓ A review of science-based data was conducted

Enter the Radon concentration value, in pCi/L, derived from the review of science-based data:

2.7

Provide the documentation* used to derive this value:

According to the Phase I ESA completed for the project site, more than 275 tests have been completed for the 55102, zip code and an average result of the tests completed was 2.7 pCi/L. This is below the 4.0 pCi/L that would require mitigation. In addition, we used the alternative strategy of reviewing science-based data. The data we reviewed was provided by the Center for Disease Control and Prevention's (CDC) National Environmental Public Health Tracking Network site. According to the site, the Annual Mean Pre-Mitigation Radon Measurement in Tested Buildings from 2010-2020 in Ramsey County was 2.9 pCi/L. This number is below the 4.0 pCi/L that would require mitigation. Therefore, the project is compliant with HUD's Radon policy and Contamination and Toxic Substances requirements.

File Upload:

[6 Radon Info from Phase I ESA.pdf](#)

Based on the response, the review is in compliance with this section. Continue to the Screen Summary at the bottom of this screen.

Radon concentration value is greater than or equal to 4.0 pCi/L and/or non-radon contamination was found in a previous question. Continue to Mitigation.

* For example, if you conducted radon testing then provide a testing report (such as an ANSI/AARST report or DIY test) if applicable (note: DIY tests are not eligible for use in multifamily buildings), or documentation of the test results. If you conducted a scientific data review, then describe and cite the maps and data used and include copies of all supporting documentation. Ensure that the best available data is utilized, if conducting a scientific data review.

8. Mitigation

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

For instances where radon mitigation is required (i.e. where test results demonstrated radon levels at 4.0 pCi/L and above), then you must include a radon mitigation plan*.

Can all adverse environmental impacts be mitigated?

No, all adverse environmental impacts cannot feasibly be mitigated.
Project cannot proceed at this location.

- ✓ Yes, all adverse environmental impacts can be eliminated through mitigation, and/or consideration of radon and radon mitigation, if needed, will occur following construction.
Provide all mitigation requirements** and documents in the Screen Summary at the bottom of this screen.

* Refer to CPD Notice [CPD-23-103](#) for additional information on radon mitigation plans.

** Mitigation requirements include all clean-up requirements required by applicable federal, state, tribal, or local law. Additionally, please upload, as applicable, the long-term operations and maintenance plan, Remedial Action Work Plan, and other equivalent documents.

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

The Phase II ESA testing identified the levels of contamination at the site. There were several auto repair shops and service stations nearby. Soil vapor testing was conducted and found levels that exceeded the requirements. Based on these results a Vapor Mitigation Response Action Plan was developed and incorporated into the project construction plans. It calls for 17 depressurized suction points to be installed on the main level connected by piping and roof fans. See attached for the Vapor Mitigation Response Action Plan. Adverse environmental impacts can be mitigated. With mitigation, identified in the mitigation section of this review, the project will be in compliance with contamination and toxic substances requirements. The project manager is responsible for ensuring this mitigation measure (Vapor Mitigation Response Action Plan) are implemented in the project and providing documentation of implementation. This mitigation measure will be incorporated into the city's Pooled TIF Loan Agreement with the developer and implementation of the measures documented after inspections following completion of the rehabilitation of the building. Documentation of the implementation of mitigation measures must be provided to the environmental officer and entered into HEROS. The following summary is from the conclusions section of the Phase II ESA.

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

follow?

Complete removal

Risk-based corrective action (RBCA)

✓ Other

* Engineering controls are any physical mechanism used to contain or stabilize contamination or ensure the effectiveness of a remedial action. Engineering controls may include, caps, covers, dikes, trenches, leachate collection systems, radon mitigation systems, signs, fences, physical access controls, ground water monitoring systems and ground water containment systems including, slurry walls and ground water pumping systems.

** Institutional controls are mechanisms used to limit human activities at or near a contaminated site, or to ensure the effectiveness of the remedial action over time, when contaminants remain at a site at levels above the applicable remediation standard which would allow for unrestricted use of the property. Institutional controls may include structure, land, and natural resource use restrictions, well restriction areas, classification exception areas, deed notices, and declarations of environmental restrictions.

Screen Summary

Compliance Determination

SOIL IMPACTS: Black soil that may be the result of staining was observed in the soil column at GP-1 from zero feet to 6 feet, the termination depth of the borings. No odors or debris was observed. TOV readings <1.0 ppmv in the retrieved soil boring soil samples. Shallow soil impacts were detected at the site including the RCRA metal arsenic. The arsenic concentration of 29.1 mg/kg exceeded the MPCA direct contact risk criteria, the residential and commercial SRV of 9 mg/kg. Lead was also detected at an elevated concentration of 178 mg/kg, below the SRV of 200 mg/kg, but at a level that TCLP testing is recommended. The TCLP lead test passed, so this soil would not be considered a characteristic hazardous waste if excavated. Petroleum DRO was detected at a low concentration of 3.42 mg/kg, which did not exceed the MPCA soil reuse limit of 100 mg/kg. VOCs were not detected in the soil sample at concentrations above the laboratory reporting limits. SOIL VAPOR IMPACTS: PCE concentrations exceeded the residential 33x ISV at two (2) of the five (5) sub-slab soil vapor sample locations (SS-2 and SS-3). A VI AOC is established for this site which intersects the building. The soil vapor contaminant of concern is PCE. A second season of soil vapor sampling is required to determine the soil vapor AOC. Since PCE exceeds regulatory criteria in sub-slab soil vapor, an active vapor mitigation system is required to be installed in the site building. The following summary is from the recommendations section of the Phase II ESA. SOIL: No additional soil sampling is recommended to assess the extent of arsenic soil impacts since the area of impacted soil is small, and

the site use is residential with no children present. Since soil excavation is planned along the west side of the building as part of site rehabilitation, JAVELIN [the consultant] recommends a Response Action Plan (RAP) be prepared and submitted to the MPCA for review and approval. In addition, based on review of the What's in My Neighborhood website for contamination, documents pertaining to the current state of environmental remediation were found. Beginning in early 2024, steps were made between the project developer and the Minnesota Pollution Control Agency (MPCA) to determine the characteristics of the site and the necessary mitigation/remediation steps. In the two documents posted within the WIMN page, it can be confirmed that there is the necessity for a vapor mitigation system and soil testing concluded several contaminant measurements over required standards. An environmental covenant must be attached to the property record. The project proposer must continue to actively work with the MNPCA to ensure the proper and environmentally-sound redevelopment, mitigation, and remediation of the property, to be compliance with the Contamination and Toxic Substances requirements. No other site on the WIMN report poses any risk to the end users/project occupants. Finally, to ensure compliance with the Contamination and Toxic Substances Requirements, we visited the EPA's "NEPAssist" and Minnesota Pollution Control Agency's (MPCA) "What's in My Neighborhood" (WIMN) GIS web applications to identify sources of contamination within 1/2 mile of the proposed HUD-assisted project site. On NEPAssist, we found no Superfund sites within 1/2 mile of 438 Dorothy Day Pl. We found 7 Brownfield sites within 1/2 mile of the proposed project site. As evidence of due diligence, these sites will be listed below and the NEPAssist Report will be uploaded to HEROS. Lowering Johnson Lower Phalen Creek Nebraska and Arkwright Rail Waste Twin Cities Auto and Salvage W 7th Street Railroad Waste Management Due to the distance from the proposed project site to these NEPAssist Brownfield sites, these sites do not pose a risk to end users/project occupants.

Supporting documentation

[6 Vapor RAP.pdf](#)

[6 WIMN Report as of August 30 2024.pdf](#)

[6 WIMN No Association Determination Request.pdf](#)

[6 WIMN No Association Determination.pdf](#)

[6 WIMN .pdf](#)

[6 NEPAssist.pdf](#)

[6 Phase II ESA.pdf](#)

[6 Phase I ESA Final.pdf](#)

Are formal compliance steps or mitigation required?

✓ Yes

No

Endangered Species

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

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

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

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

The following species were identified in the IPaC species list generated on August 28, 2024: Northern Long-eared Bat, Tricolored Bat, Whopping Crane, Higgins Eye (pearlymussel), Salamander Mussel, Rusty Patched Bumble Bee, and Monarch Butterfly. Project activities will have no effect on the Northern Long-eared Bat. This determination can be made because project activities do not involve clearing or

disturbing suitable habitat, no activity in or near the entrance to cave or mine, nor mining, deep excavation, or underground work within 0.25 miles of a cave or mine, nor construction of wind turbines or demolition or reconstruction of human made structures known to be used by bats. Project activities will have no effect on the Tricolored Bat. This determination can be made because project activities do not involve clearing or disturbing suitable habitat, no activity in or near the entrance to cave or mine, nor mining, deep excavation, or underground work within 0.25 miles of a cave or mine, nor construction of wind turbines or demolition or reconstruction of human made structures known to be used by bats. Project activities will have no effect on the Whooping Crane. This determination can be made because the Whooping Crane is designated as a "non-essential" experimental population in Minnesota. Consultation under Section 7(a)(2) of the Endangered Species Act is only required if project activities will occur within a National Wildlife Refuge or National Park. Since proposed project activity will occur on land outside of a National Wildlife Refuge or National Park, we are not required to consult for this species. Project activities will have no effect on the Higgins Eye (pearly mussel). This determination can be made because project activities do not involve habitat loss, degradation, or introduction of exotic species including Zebra mussels, which are the major threats to the survival of the Higgins eye mussel. Project activities will have no effect on the Salamander Mussel. This determination can be made because the species, as of September 1st, 2023, has been proposed for listing as an endangered species under the Endangered Species Act of 1973. As a result, this species is not yet protected by the Act. Proposed Critical Habitat for the Salamander Mussel exists in Chisago and Washington County, Minnesota, specifically in the St. Croix River. The proposed project activity will not impact known habitat. Project activities will have no effect on the Rusty Patched Bumble Bee. This determination can be made because project activities do not involve habitat loss, degradation, or introduction of pathogens or exposure to insecticides or fungicides, which are suspected to be the major threats to the species along with non-native and managed bees, the effects of climate change, and small population biology. The Monarch Butterfly is a candidate species and not yet listed or proposed for listing. There are currently no section 7 requirements for candidate species. Project activities will not impact known habitat. Project activities do not involve construction of Communication Towers (radio, television, cellular, and microwave towers), Transmission Lines (power lines or poles, particularly those with uninsulated or unguarded electrical currents), or Wind Turbines. Therefore, there will be no effect on migratory birds. In addition, there are no critical habitats for the listed species within the project area under the USFWS jurisdiction. The project site is in a fully urbanized area and there is no habitat present in the project site for the species on the IPaC list. The proposed project activities will not jeopardize the continued existence of any listed species. Therefore, the project is compliant with Section 7 requirements.

Supporting documentation

[\(7\) Endangered Species Act \(ESA\) Compliance.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Explosive and Flammable Hazards

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

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

No

Yes

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

No

Yes

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

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

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

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

No

Yes

4. Based on the analysis, is the proposed HUD-assisted project located at or beyond the required separation distance from all covered tanks?

Yes

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

No

Screen Summary

Compliance Determination

There are four aboveground storage tanks within a mile of the project site. All are an acceptable separation distance from the project site. See attached summary of information about the tanks along with the MPCA information and the ASD calculation results. The Separation Distance from the project is acceptable. The project is in compliance with explosive and flammable hazard requirements.

Supporting documentation

[8 St Joseph ASD.pdf](#)
[8 Summary of Tank Information.pdf](#)
[8 Saint Joseph Hospital MNPCA.pdf](#)
[8 Praxair Tank Permit Data.pdf](#)
[8 MN Business Academy WIMN.pdf](#)
[8 MN Business Academy ASD.pdf](#)
[8 Minnesota Business Academy MNPCA.pdf](#)
[8 Explosive and Flammable Hazards Compliance.pdf](#)
[8 Ecolab MNPCA.pdf](#)
[8 District Energy WIMN.pdf](#)
[8 District Energy St Paul Inc MNPCA.pdf](#)
[8 District Energy ASD.pdf](#)
[8 Buffer from Largest Tank within 1 mile radius.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Farmlands Protection

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

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

Yes

No

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 compliant with the Farmland Protection Policy Act.

Supporting documentation

[9 US Census Bureau Urbanized Area Map.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Floodplain Management

General Requirements	Legislation	Regulation
Executive Order 11988, Floodplain Management, requires Federal activities to avoid impacts to floodplains and to avoid direct and indirect support of floodplain development to the extent practicable.	Executive Order 11988 * Executive Order 13690 * 42 USC 4001-4128 * 42 USC 5154a * only applies to screen 2047 and not 2046	24 CFR 55

1. Does this project meet an exemption at 24 CFR 55.12 from compliance with HUD's floodplain management regulations in Part 55?

Yes

(a) HUD-assisted activities described in 24 CFR 58.34 and 58.35(b).

(b) HUD-assisted activities described in 24 CFR 50.19, except as otherwise indicated in § 50.19.

(c) The approval of financial assistance for restoring and preserving the natural and beneficial functions and values of floodplains and wetlands, including through acquisition of such floodplain and wetland property, where a permanent covenant or comparable restriction is place on the property's continued use for flood control, wetland projection, open space, or park land, but only if:

(1) The property is cleared of all existing buildings and walled structures; and

(2) The property is cleared of related improvements except those which:

(i) Are directly related to flood control, wetland protection, open space, or park land (including playgrounds and recreation areas);

(ii) Do not modify existing wetland areas or involve fill, paving, or other ground disturbance beyond minimal trails or paths; and

(iii) Are designed to be compatible with the beneficial floodplain or wetland function of the property.

(d) An action involving a repossession, receivership, foreclosure, or similar acquisition of property to protect or enforce HUD's financial interests under previously approved loans, grants, mortgage insurance,

or other HUD assistance.

(e) Policy-level actions described at 24 CFR 50.16 that do not involve site-based decisions.

(f) A minor amendment to a previously approved action with no additional adverse impact on or from a floodplain or wetland.

(g) HUD's or the responsible entity's approval of a project site, an incidental portion of which is situated in the FFRMS floodplain (not including the floodway, LiMWA, or coastal high hazard area) but only if: (1) The proposed project site does not include any existing or proposed buildings or improvements that modify or occupy the FFRMS floodplain except de minimis improvements such as recreation areas and trails; and (2) the proposed project will not result in any new construction in or modifications of a wetland .

(h) Issuance or use of Housing Vouchers, or other forms of rental subsidy where HUD, the awarding community, or the public housing agency that administers the contract awards rental subsidies that are not project-based (i.e., do not involve site-specific subsidies).

(i) Special projects directed to the removal of material and architectural barriers that restrict the mobility of and accessibility to elderly and persons with disabilities.

Describe:

No

2. Does the project include a Critical Action? Examples of Critical Actions include projects involving hospitals, fire and police stations, nursing homes, hazardous chemical storage, storage of valuable records, and utility plants.

Yes

Describe:

No

3. Determine the extent of the FFRMS floodplain and provide mapping documentation in support of that determination

The extent of the FFRMS floodplain can be determined using a Climate Informed Science Approach (CISA), 0.2 percent flood approach (0.2 PFA), or freeboard value approach (FVA). For projects in areas without available CISA data or without FEMA Flood Insurance Rate Maps (FIRMs), Flood Insurance Studies (FISs) or Advisory Base Flood Elevations (ABFEs), use the best available information¹ to determine flood elevation. Include documentation and an explanation of why this is the best available information² for the site. Note that newly constructed and substantially improved³ structures must be elevated to the FFRMS floodplain regardless of the approach chosen to determine the floodplain.

Select one of the following three options:

CISA for non-critical actions. If using a local tool, data, or resources, ensure that the FFRMS elevation is higher than would have been determined using the 0.2 PFA or the FVA.

0.2-PFA. Where FEMA has defined the 0.2-percent-annual-chance floodplain, the FFRMS floodplain is the area that FEMA has designated as within the 0.2-percent-annual-chance floodplain.

- ✓ FVA. If neither CISA nor 0.2-PFA is available, for non-critical actions, the FFRMS floodplain is the area that results from adding two feet to the base flood elevation as established by the effective FIRM or FIS or — if available — a FEMA-provided preliminary or pending FIRM or FIS or advisory base flood elevations, whether regulatory or informational in nature. However, an interim or preliminary FEMA map cannot be used if it is lower than the current FIRM or FIS.

¹ Sources which merit investigation include the files and studies of other federal agencies, such as the U. S. Army Corps of Engineers, the Tennessee Valley Authority, the Soil Conservation Service and the U. S. Geological Survey. These agencies have prepared flood hazard studies for several thousand localities and, through their technical assistance programs, hydrologic studies, soil surveys, and other investigations have collected or developed other floodplain information for numerous sites and areas. States and communities are also sources of information on past flood 'experiences within their boundaries and are particularly knowledgeable about areas subject to high-risk flood hazards such as alluvial fans, high velocity flows, mudflows and mudslides, ice jams, subsidence and liquefaction.

² If you are using best available information, select the FVA option below and provide supporting documentation in the screen summary. Contact your [local environmental officer](#) with additional compliance questions.

³ Substantial improvement means any repair or improvement of a structure which costs at least 50 percent of the market value of the structure before repair or improvement or results in an increase of more than 20 percent of the number of dwelling units. The full definition can be found at [24 CFR 55.2\(b\)\(12\)](#).

5. Does your project occur in the FFRMS floodplain?

Yes

✓ No

Screen Summary

Compliance Determination

This project does not occur in the FFRMS floodplain. The project is in compliance with Executive Orders 11988 and 13690.

Supporting documentation

[\(10\) Floodplain Management Compliance.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Historic Preservation

General requirements	Legislation	Regulation
Regulations under Section 106 of the National Historic Preservation Act (NHPA) require a consultative process to identify historic properties, assess project impacts on them, and avoid, minimize, or mitigate adverse effects	Section 106 of the National Historic Preservation Act (16 U.S.C. 470f)	36 CFR 800 “Protection of Historic Properties” https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol3/pdf/CFR-2012-title36-vol3-part800.pdf

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).

Threshold (b). Document and upload the memo or explanation/justification of the other determination below:

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

Screen Summary

Compliance Determination

The Saint Joseph's Hospital Nurses Home (Mary Hall) at 438 Dorothy Day Place, St. Paul, (RA-SPC-05418) has been determined eligible for listing in the National Register of Historic Places (NRHP). In order for the State Historic Preservation Office (SHPO) to make a determination that the proposed project will not adversely affect the historic property, the rehabilitation must be designed in conformance with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Standards). The proposed federal undertaking, the rehabilitation of this

historic building, is pursuing certification under the Federal Historic Preservation Tax Incentives Program and that the Part II Description of Rehabilitation has been approved, with conditions, by the SHPO. Therefore, because participation in the federal tax program will ensure that the rehabilitation is designed in conformance with the Standards, the SHPO provided a determination that this project will have no adverse effect on the historic property contingent upon the work being completed per the approved Part II application. If for any reason the developer does not continue to pursue the federal historic preservation tax credits, consultation with the SHPO will need to be re-initiated in order to complete its review, pursuant to Section 106 of the National Historic Preservation Act. The following conditions for the rehabilitation were established as part of the NRHP eligibility: CORRIDORS: Historic dorm room door openings and transoms must be retained to preserve the historic character of the residential area of the buildings. Doors openings may be infilled, but historic trim must be retained. New trim should match the existing or historic where extant. HVAC: New systems must be installed in a manner that does not impact the historic character and features. Corridor ceilings must not be lowered below door or transoms frames, and unit ceilings must not be lowered below windows. Ceilings should be kept at or higher than existing ACT ceilings. The project manager is responsible for ensuring these mitigation measures (conditions for rehabilitation related to corridors and HVAC) are implemented in the project and providing documentation of implementation. These mitigation measures will be incorporated into the city's Pooled TIF Loan Agreement with the developer and implementation of the measures documented after inspections following completion of the rehabilitation of the building. Documentation of the implementation of mitigation measures must be provided to the environmental officer and entered into HEROS. The project is in compliance with Section 106.

Supporting documentation

[11 SHPO No Adverse Effect Determination.pdf](#)

[11 HP Eligibility for Listing on NRHP from SHPO.pdf](#)

[11 HP Certification Approval from NPS.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Noise Abatement and Control

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

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

New construction for residential use

Rehabilitation of an existing residential property

NOTE: For major or substantial rehabilitation in Normally Unacceptable zones, HUD encourages mitigation to reduce levels to acceptable compliance standards. For major rehabilitation in Unacceptable zones, HUD strongly encourages mitigation to reduce levels to acceptable compliance standards. See 24 CFR 51 Subpart B for further details.

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

An interstate land sales registration

Any timely emergency assistance under disaster assistance provision or appropriations which are provided to save lives, protect property, protect public health and safety, remove debris and wreckage, or assistance that has the effect of restoring facilities substantially as they existed prior to the disaster
None of the above

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

Indicate the findings of the Preliminary Screening below:

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

- ✓ Noise generators were found within the threshold distances.

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

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

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

Indicate noise level here: 75

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

Unacceptable: (Above 75 decibels)

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

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

Indicate noise level here: 75

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

6. **HUD strongly encourages mitigation be used to eliminate adverse noise impacts. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation. This information will be automatically included in the Mitigation summary for the environmental review.**

Mitigation as follows will be implemented:

- ✓ No mitigation is necessary.

Explain why mitigation will not be made here:

The noise level falls into a normally unacceptable category (75 dB). Noise attenuation is strongly encouraged for rehabilitation projects. The developer provided STraCAT assessment results showing that sound attenuation will be achieved with the installation of new window systems specified for the project. An STC rating of 34.92 is achieved with materials specified for the project; an STC of 33 rating strongly encouraged.

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

Screen Summary

Compliance Determination

A Noise Assessment was conducted. There are 2 airports, 7 railways, and 18 roadways in proximity to the project site. The noise level is normally unacceptable: 75.0 dB. See noise analysis uploaded to HEROS. The developer plans to install new window systems that will provide noise attenuation. A STraCAT analysis was completed showing that an STC rating of 34.92 is achieved with materials specified for the project (33 STC rating strongly encouraged). The STraCAT analysis has been uploaded to HEROS. The project is in compliance with HUD's Noise regulation without mitigation.

Supporting documentation

[12 STraCAT ANALYSIS 09202024.pdf](#)

[12 STC Rating Sheet.pdf](#)

[12 Roadways within 1000 feet.pdf](#)

[12 Railway within 3000 ft.pdf](#)

[12 Noise DNL Calculator.pdf](#)

Are formal compliance steps or mitigation required?

Yes

- ✓ No

Sole Source Aquifers

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

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

Yes

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

No

Screen Summary

Compliance Determination

The EPA has an online GIS application called "Sole Source Aquifers" that shows the location of SSA's across the country. The only SSA in the state of Minnesota is encompasses Lake Mille Lacs. The project site is approximately 80 miles away from the southernmost point of the Mille Lacs SSA. Since the proposed project site is not on a SSA, the project is in compliance with Sole Source Aquifer requirements.

Supporting documentation

[13 Sole Source Aquifer.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Wetlands Protection

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

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

✓ No

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

[\(14\) Wetlands Protection Compliance.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Wild and Scenic Rivers Act

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

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

No

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

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

Screen Summary

Compliance Determination

After utilizing our GIS software, we were able to determine that the project site, is not located near any NWSRS. Therefore, the project is compliant the Wild and Scenic Rivers Act. T

Supporting documentation

[15 Wild Rivers.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Environmental Justice

General requirements	Legislation	Regulation
Determine if the project creates adverse environmental impacts upon a low-income or minority community. If it does, engage the community in meaningful participation about mitigating the impacts or move the project.	Executive Order 12898	

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

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

Yes

No

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

Are formal compliance steps or mitigation required?

Yes

No