



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

451 Seventh Street, SW
Washington, DC 20410
www.hud.gov

espanol.hud.gov

Broad-Level Tiered Environmental Review for Activity/Project that is Categorically Excluded Subject to Section 58.5 Pursuant to 24 CFR Part 58.35(a)

Project Information

Project Name: Citywide Demolition Program Multi Year (2020-2024) Non Site-Specific

Responsible Entity (RE): City of Brunswick, GA

State/Local Identifier: FY 2020-2024 CDBG

RE Preparer: David Bravo, Dept. of Neighborhood and Community Services

Certifying Officer: Cornell Harvey, Mayor

Grant Recipient (if different than Responsible Entity):

Point of Contact:

Consultant (if applicable): Mullin & Lonergan Associates

Point of Contact: Christine DeRunk

Project Location: Sites to be determined

Additional Location Information:

Direct Comments to: David Bravo, Dept. of Neighborhood and Community Services

City of Brunswick

601 Gloucester Street

Brunswick, Georgia 31520

Ph: (912) 267-5584

Fax: (912) 267-5549

dbravo@cityofbrunswick-ga.gov

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

To remove slum and blight, the City of Brunswick will continue its spot demolition program. Approximately three sites will be selected annually. Funding will be provided via the CDBG Program. Estimated FY 2020 allocation \$30,149. Additional years are expected to be funded as follows: FY21 \$30,000, FY22 \$30,000, FY23 \$30,000, FY24 \$30,000. Actual funding will be

determined on an annual basis and included in the Annual Action Plan. A Tier 2 review will be conducted as outlined in the Tier 2 Strategy; if project spacing is less than 2,000 feet and/or there are more than four units as part of a project, a separate ERR will be completed.

Approximate size of the project area: To be determined

Length of time covered by this review: FY 2020-FY 2024

Maximum number of dwelling units or lots addressed by this tiered review: 15 (estimated) at approximately three per year

Level of Environmental Review Determination:

Categorically Excluded per 24 CFR 58.35(a)(4)(i) and subject to laws and authorities at §58.5.

- (i) 24 CFR 58.35 (a)(4)(i): An individual action on up to four dwelling units where there is a maximum of four units on any one site. The units can be four one-unit buildings or one four-unit building or any combination in between.
- (ii) 24 CFR 58.35 (a)(4)(ii) An individual action on a **project** of five or more housing units developed on scattered sites when the sites are more than 2,000 feet apart and there are not more than four housing units on any one site.

Funding Information

HUD Program	Program Name	Funding Amount
CDBG 2020-2024	CDBG	\$150,000

Estimated Total HUD Funded Amount: \$30,49 in FY 2020 and approximately \$30,000 in each of FY 2021-2024

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]: \$30,49 in FY 2020, FY21 \$30,000, FY22 \$30,000, FY23 \$30,000, FY24 \$30,000. Actual funding will be determined on an annual basis and included in the Annual Action Plan.

Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities and Written Strategies

<p>Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR 50.4, 58.5, and 58.6</p>	<p>Was compliance achieved at the broad level of review?</p>	<p>If Yes: Describe compliance determinations made at the broad level. If No: Describe the policy, standard, or process to be followed in the site-specific review.</p>
<p>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.6</p>		
<p>Airport Hazards 24 CFR Part 51 Subpart D</p>	<p>Yes No <input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>Per the attached map, there are no civil airports within 2,500 or military airports within 15,000 feet of any point within the City limits.</p>
<p>Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]</p>	<p>Yes No <input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>Per the attached map, the coastal barrier zones in the state of Georgia are not located within the City of Brunswick.</p>
<p>Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]</p>	<p>Yes No <input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>This project does not involve mortgage insurance, refinance, acquisition, repairs, rehabilitation, or construction of a structure, mobile home, or insurable personal property and therefore does not trigger the threshold.</p>
<p>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §58.5</p>		
<p>Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93</p>	<p>Yes No <input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>Project does not trigger threshold because it does not include conversion of land use facilitating the development of public, commercial or industrial facilities on five or more dwelling units.</p>
<p>Coastal Zone Management Coastal Zone Management Act, sections 307(c) & (d)</p>	<p>Yes No <input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>The southeastern portion of Brunswick is located in a coastal zone. Due to the nature of the project activities, a preliminary finding that the demolitions are consistent with the CGMP and are not located in CBRA areas per the letter from Georgia Department of Natural Resources Coastal Resources Division on January 26, 2021.</p>

<p>Contamination and Toxic Substances</p> <p>24 CFR Part 50.3(i) & 58.5(i)(2)]</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>Each site will be inspected for evidence of contamination and toxic substances. EPA and/or DEP websites will be checked for offsite contamination. Note: Any asbestos remediation will comply with NESHAP regulations. See written strategy.</p>
<p>Endangered Species</p> <p>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>Each site will be reviewed for endangered species. See written strategy.</p>
<p>Explosive and Flammable Hazards</p> <p>24 CFR Part 51 Subpart C</p>	<p>Yes No <input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>The project does not include development, construction, rehabilitation that will increase residential densities, or conversion nor is the project related to a hazardous facility.</p>
<p>Farmlands Protection</p> <p>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p>Yes No <input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>Project does not involve acquisition of undeveloped land or changes in use of land or property in or near farmlands. Further, project is in an urbanized area and will not impact potential farmlands. Project is in compliance.</p>
<p>Floodplain Management</p> <p>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>Each selected site will be reviewed for compliance. See written strategy.</p>
<p>Historic Preservation</p> <p>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>Specific project activities will be submitted to the state housing preservation department as properties are identified. See written strategy.</p>
<p>Noise Abatement and Control</p> <p>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p>Yes No <input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>This project does not involve new construction or rehabilitation of residential structures.</p>
<p>Sole Source Aquifers</p> <p>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p>Yes No <input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>Per the attached map, the City of Brunswick is not located in a designated sole source aquifer area.</p>
<p>Wetlands Protection</p> <p>Executive Order 11990, particularly sections 2 and 5</p>	<p>Yes No <input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>The project does not involve new construction (as defined in Executive Order</p>

**FY2020 -2024 COUNTY-WIDE DEMOLITION
TIERED REVIEW: MULTI-YEAR, NON-SITE SPECIFIC
CITY OF BRUNSWICK**

ENVIRONMENTAL REVIEW STRATEGY

Sites selected for Demolition in FY2020-2024 must be screened using the attached “Tier 2 Review Checklist” to determine whether or not the proposed activity/activities should be considered as a separate project for environmental review purposes. If the activity must be considered as a separate project, the City must determine whether to reject the activity or conduct a new environmental review.

For sites that pass the screening, a Tier 2, Site-Specific review must be completed using the attached checklist. The broad level review for FY2020-2024 Demolition demonstrated compliance with the following statutes, as documented in the attached environmental determination forms and associated supporting documentation: Airport Hazards, Coastal Barrier Resources, Flood Insurance, Clean Air, Coastal Zone Management, Explosive and Flammable Hazards, Farmlands Protection, Noise Abatement and Control, Sole Source Aquifers, Wetlands, and Wild and Scenic Rivers.

For sites that pass the screening, a Tier 2, Site-Specific review must be completed. The site specific reviews must address the following statutes for which compliance was not achieved at the broad level: Contamination and Toxic Substances, Endangered Species, Floodplain Management, Historic Preservation, and Environmental Justice. When completed, these site-specific reviews must be attached to the approved Tier 1 review for FY2020-2024 Demolition.

Contamination and Toxic Substances: The City will utilize NEPAAssist mapping tools to identify potentially contaminated sites and toxic substances in the vicinity of the project area as sites are identified. Additionally, the PA Asbestos Abatement and Demolition/Renovation Notification Form will be completed as necessary. Any asbestos remediation will comply with NESHAP regulations.

Endangered Species: The IPaC Tool from the US Fish and Wildlife Service will be used to evaluate potential project sites’ effect on endangered species and/or critical habitats. Consultation to mitigate potential impacts will be conducted with appropriate state agencies as necessary.

Floodplain Management: Compliance determinations for Floodplain Management (EO 11988, particularly section 2(a); 24 CFR Part 55) may be made using FEMA’s Flood Map Service Center. If selected sites are located in the 100-year floodplain, an 8-step review process will be followed.

Historic Preservation: To determine compliance with the Historic Preservation (National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800), the following information must be sent to the State Historic Preservation Office: Building details, photographs, and map locations.

Environmental Justice: Determine if the project creates adverse environmental impacts upon a low-income or minority community (EO 12898). If it does, engage the community in meaningful participation about mitigating the impacts or move the project.

Tier 2 - Site Specific Environmental Review Checklist
City of Brunswick
Spot Demolition

Upon the determination of specific sites for participation in the Demolition Program, this checklist serves to determine the actions required to ensure compliance with all NEPA-related statutes, authorities, and requirements that were not addressed as part of the Program's broader five-year clearance.

Project Location: _____

Section 1: Categorical Exclusion Threshold

1. Will demolition involve anything other than: An individual action on a project of five or more housing units developed on scattered sites when the sites are more than 2,000 feet apart and there are not more than four housing units on any one site?
 YES NO

If NO, proceed to the next question.

If YES, a separate environmental review must be conducted.

Section 2. Contaminants and Toxic Substances

1. Were any on-site or nearby toxic, hazardous, or radioactive substances found that could affect the health and safety of project occupants or conflict with the intended use of the property?
 YES NO

If NO, proceed to the next question.

If YES, document the mitigation needed according to the requirements of the appropriate federal, state, tribal, or local oversight agency. If the adverse environmental effects cannot be mitigated, then HUD assistance may not be used for the project at this site. A new ERR is needed for any site that has a presence of toxics or requires cleanup.

2. Does the site contain evidence of contamination to soil or water such as: distressed vegetation, vent or fill pipes, storage tanks, pits, ponds or lagoons, stained soil or pavement, pungent, foul or noxious odors, past uses of the site? Sites will also be inspected for the presence of mold, asbestos, and lead-based paint. Complete "Field Contamination Checklist"
 YES NO

If NO, proceed to the next section.

If YES, either reject site, require cleanup/remediation prior to project implementation, or conduct cleanup/remediation as part of project implementation. A new ERR is needed for any site that has a presence of toxics or requires cleanup.

Section 3: Endangered Species

1. Are there potential impacts to threatened, endangered, special concern species and special concern resources?

YES NO

If NO, proceed to the next section.

If YES, consult with appropriate state agencies to mitigate potential impacts.

Section 4: Floodplain Management

1. Is the project located in the 100-year floodplain?

YES NO

If NO, attach the FIRM Panel that indicates the site is not in the floodplain and proceed to the next section.

If YES, complete the 8-step process per 24 CFR Part 55 and determine if preservation or deed restriction is required.

Section 5: Historic Preservation

1. For each property, a completed Project Review Form should be submitted to the SHPO for review. Please submit clear photographs of all the affected buildings in addition to surrounding buildings, keyed to a map, to obtain concurrence regarding their eligibility for listing in the National Register of Historic Places, either individually or as part of a historic district.

Date Submitted to SHPO:

Date of Response:

Was response: No Effect (no historic property)
 No Adverse Effect (historic but no impact)
 Adverse Effect - MOA required

Section 6: Environmental Justice

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

YES NO

If NO, complete and sign form on next page.

If YES, proceed to next question.

Section 6: Environmental Justice (cont.)

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

YES NO

If NO, complete and sign form.

If YES, describe mitigation measures and evidence of efforts to work with the low-income/minority communities to mitigate effects.

Approval of Environmental Tier 2:

_____	_____	_____
Signature of Preparer	Title	Date

_____	_____	_____
Director/Supervisor	Title	Date

Approve

Prepare Part 58 Documentation

Air Quality

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

Air Quality. This threshold is triggered if the project is within a non-attainment area for which EPA has approved the State Implementation Plan (SIP), and there are SIP controls for such a project. If compliance issues are transportation related, priority must be given to implementing these portions of the SIP to achieve and maintain national primary air quality standards.

- Any activities involving the removal and disposal of asbestos from facilities/structures will require consultation with the appropriate agency to ensure compliance with the requirements.
- Any construction project which involves fugitive dust emissions (FDE) must ensure that mitigating measures are undertaken to limited FDE. Design engineers/consultants should be familiar with the requirements which are to be included in construction documents.
- Any development which will result in increased vehicular traffic (e.g. parking facilities or, new development) must consider the impact on air quality.

The environmental review record should contain one of the following:

- A determination that the project does not include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units
- Documentation that the project's county or air quality management district is not in nonattainment or maintenance status for any criteria pollutants
- Evidence that estimated emissions levels for the project do not exceed de minimis emissions levels for the nonattainment or maintenance level pollutants
- A determination that the project can be brought into compliance with the State Implementation Plan (SIP) through modification or mitigation, including documentation on how the project can be brought into compliance



The project does not include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units.

Air Quality (CEST and EA)

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
Reference		
https://www.hudexchange.info/environmental-review/air-quality		

Scope of Work

- 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

→ Continue to Question 2.

No

Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.

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

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

Follow the link below to determine compliance status of project county or air quality management district:

<http://www.epa.gov/oaqps001/greenbk/>

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

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.

- Yes, project's management district or county is in non-attainment or maintenance status for one or more criteria pollutants.

Describe the findings:

→ Continue to Question 3.

- 3. Determine the estimated emissions levels of your project for each of those criteria pollutants that are in non-attainment or maintenance status on your project area. Will your project exceed any of the *de minimis* or *threshold* emissions levels of non-attainment and maintenance level pollutants or exceed the screening levels established by the state or air quality management district?**

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

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Explain how you determined that the project would not exceed *de minimis* or *threshold* emissions.

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

→ Continue to Question 4. Explain how you determined that the project would not exceed *de minimis* or *threshold* emissions in the Worksheet Summary.

- 4. For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.**

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

The project does not include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units.

Are formal compliance steps or mitigation required?

Yes

No

January 7, 2021

Environmental Review Team
US EPA Region IV
Sam Nunn Atlanta Federal Center (SNAFC)
61 Forsyth Street SW
Atlanta, GA 30303-8960

**Re: Environmental Compliance Review
City of Brunswick Community Development Block Grant (CDBG) Program**

To Whom it may Concern:

I am writing on behalf of the City of Brunswick. The City proposes to use CDBG funds to complete a spot demolition program as described in the enclosed activity description to remove vacant, blighted structures that pose a threat to health and safety. To fully comply with applicable National Environmental Protection Act (NEPA) procedures, the City is requesting your comments in relation to potential environmental impacts associated with the demolitions.

The program involves the demolition of 1-4 unit single family housing units. The sites will be inspected prior to demolition and hazardous substances such as asbestos will be disposed of in accordance with the law. Therefore, we make a preliminary finding that the projects will have no effect on the environment relative to the NEPA thresholds, and we will proceed with the projects.

We request that your response be completed within 30 days of your receipt of this letter. No action will be taken to implement these undertakings for a period of 35 days from your receipt of our request. If no response is received within 35 calendar days from your receipt of this letter, it is assumed that you agree with our findings and the projects can proceed. Please contact me at 412-323-1950 or christined@mandl.net if you have any questions concerning the enclosed information.

Thank you for your consideration.

Sincerely,



Christine DeRunk
Housing and Community Development Specialist

Enclosures

Airport Runway Clear Zones

Code of Federal Regulations, 24 CFR Part 51D, Section 51.302

Runway Clear Zones at Designated Commercial Service Airports and Clear Zones and Accident Potential Zones at Military Airfields. Assistance for construction or major rehabilitation of any real property located on a clear zone site is prohibited for a project to be frequently used or occupied by people. For properties located within 2,500 feet of the end of a civil airport runway or 15,000 feet of the end of a military airfield runway, the airport operator should make a finding stating whether or not the property is located within a runway clear zone for civil airports or a clear zone or accident potential zone at a military airfield.

For a project not to be frequently used or occupied by people, HUD assistance may be approved only when written assurances are provided to HUD by the airport operator to the effect that there are no plans to purchase the land involved with such facilities as part of a Runway Clear Zone or Clear Zone acquisition program.

The environmental review record should contain **one** of the following:

- Documentation that the rule is not applicable to the proposed project (i.e., acquisition of an existing building, “minor” rehabilitation, or emergency action)
- A map showing the site is not within 15,000 feet of a military airport or within 2,500 feet of a civilian airport
- If within 15,000 feet of a military airport, a map showing the site is not within a designated APZ or a letter from the airport operator stating so
- If within 2,500 feet of a civilian airport, a map showing the site is not within a designated RPZ/CZ or a letter from the airport operator stating so
- If the site is in a designated APZ, documentation of consistency with DOD Land Use Compatibility Guidelines
- If the site is in a designated RPZ/CZ and the project does not involve any facilities that will be frequently used or occupied by people, and a determination of such and a written assurance from the airport operator that there are no plans to purchase the land as part of a RPZ/CZ program
- If the site is in a designated RPZ/CZ and the project involves the acquisition or sale of an existing property that will be frequently used or occupied by people, a copy of the notice to prospective buyers signed by the prospective buyer



Per the attached map, there are no civil airports within 2,500 or military airports within 15,000 feet of any point within the City limits.

Airport Hazards (CEST and EA)

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
References		
https://www.hudexchange.info/environmental-review/airport-hazards		

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. Continue to the Worksheet Summary below. Provide a map showing that the site is not within the applicable distances to a military or civilian airport.*

Yes → *Continue to Question 2.*

2. Is your project located within a Runway Potential Zone/Clear Zone (RPZ/CZ) or Accident Potential Zone (APZ)?

Yes, project is in an APZ → *Continue to Question 3.*

Yes, project is an RPZ/CZ → *Project cannot proceed at this location.*

No, project is not within an APZ or RPZ/CZ

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing that the site is not within either zone.*

3. Is the project in conformance with DOD guidelines for APZ?

Yes, project is consistent with DOD guidelines without further action.

Explain how you determined that the project is consistent:

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documentation supporting this determination.*

No, the project cannot be brought into conformance with DOD guidelines and has not been approved.
→ *Project cannot proceed at this location.*

Project is not consistent with DOD guidelines, but it has been approved by Certifying Officer or HUD Approving Official.

Explain approval process:

If mitigation measures have been or will be taken, explain in detail the proposed measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documentation supporting this determination.*

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

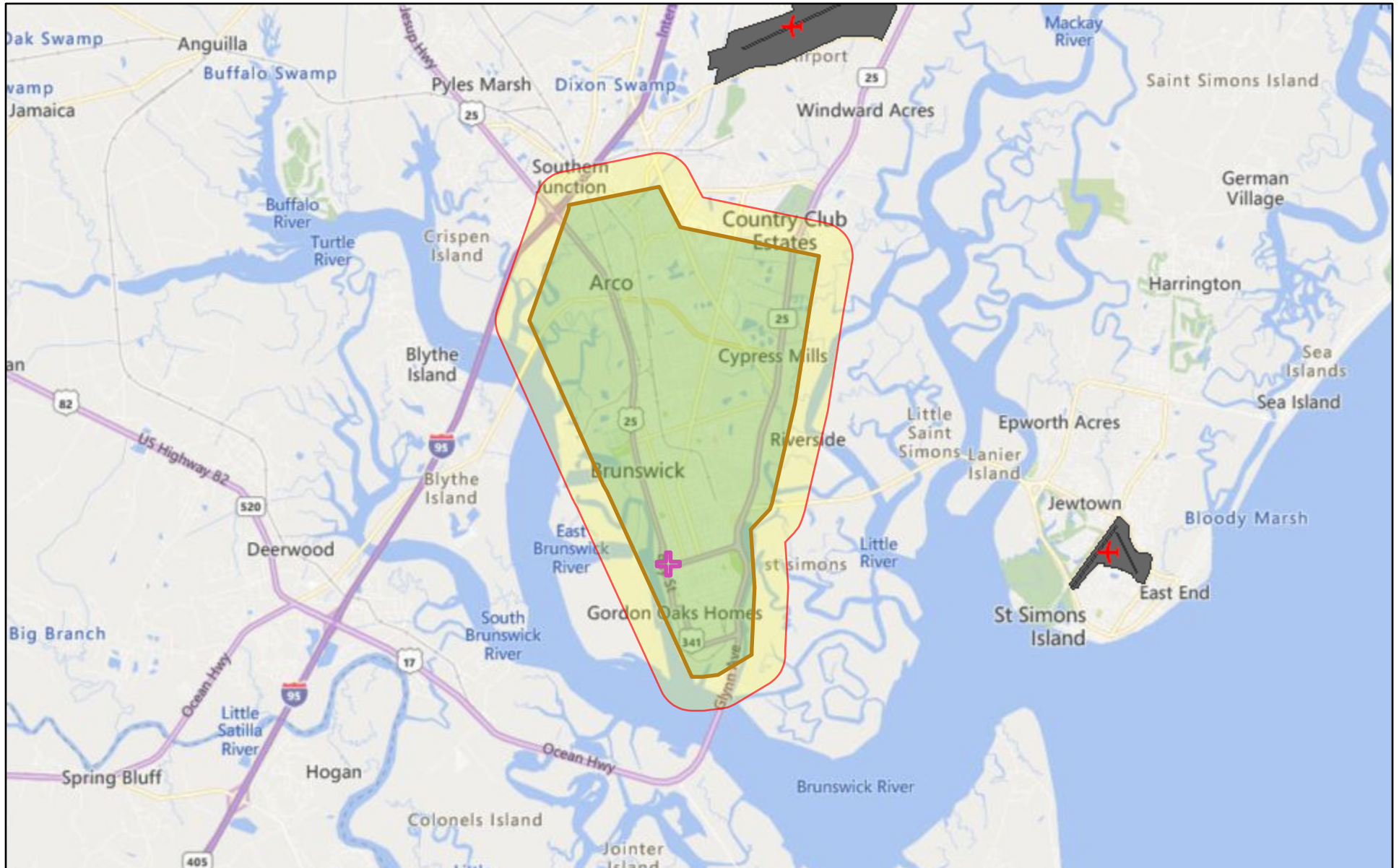
- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

Per the attached map, there are no civil airports within 2,500 or military airports within 15,000 feet of any point within the City limits.






Are formal compliance steps or mitigation required?

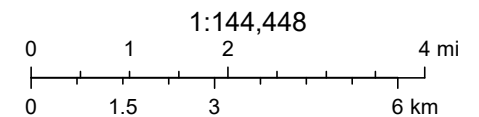
- Yes
- No

Brunswick Citywide Airports 2500 ft

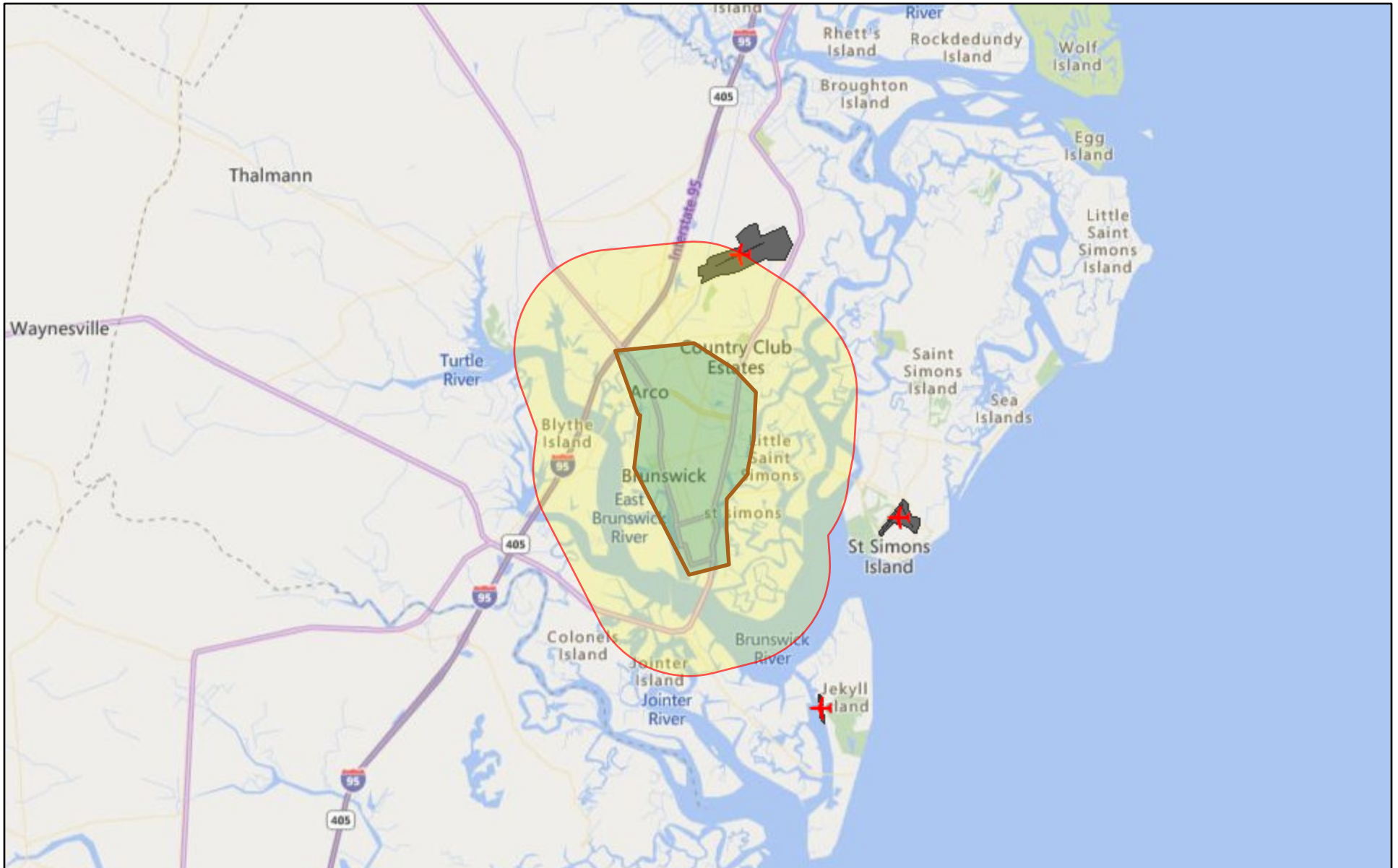


April 8, 2021

-  Project Buffer
-  Search Result (point)
-  Airport Polygons
-  Project 1
-  Airport Points

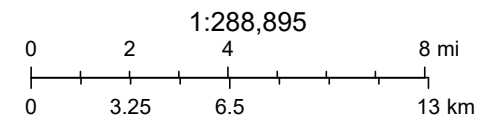


Brunswick Citywide Airports 15000 ft



April 8, 2021

-  Project 1
-  Project Buffer
-  Airport Points
-  Airport Polygons



Coastal Barrier Resources

Coastal Barrier Resources (CBRS) The Coastal Barrier Resources Act (CBRA) of 1982 designated relatively undeveloped coastal barriers along the Atlantic and Gulf coasts as part of the John H. Chafee Coastal Barrier Resources System (CBRS) and made these areas ineligible for most new Federal expenditures and financial assistance. The Coastal Barrier Improvement Act (CBIA) of 1990 reauthorized the CBRA and expanded the CBRS to include undeveloped coastal barriers along the Florida Keys, Great Lakes, Puerto Rico, and U.S. Virgin Islands.

The environmental review record should contain **one** of the following:

- A general location map establishing there are no Coastal Barrier Resource System units in the city or county
- A map issued by the FWS or FEMA (or from their website) showing that the proposed project is not located within a designated Coastal Barrier Resource System Unit. The FEMA map panel number must be cited within the Environmental Review Record
- Approval of the project from the FWS, including all prior correspondence



Per the attached map, the coastal barrier zones in the state of Georgia are not located within the City of Brunswick.

Coastal Barrier Resources (CEST and EA)

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)	
References		
https://www.hudexchange.info/environmental-review/coastal-barrier-resources		

Projects located in the following states must complete this form.

Alabama	Georgia	Massachusetts	New Jersey	Puerto Rico	Virgin Islands
Connecticut	Louisiana	Michigan	New York	Rhode Island	Virginia
Delaware	Maine	Minnesota	North Carolina	South Carolina	Wisconsin
Florida	Maryland	Mississippi	Ohio	Texas	

1. Is the project located in a CBRS Unit?

- No → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing that the site is not within a CBRS Unit.*
- Yes → *Continue to Question 2.*

Federal assistance for most activities may not be used at this location. You must either choose an alternate site or cancel the project. In very rare cases, federal monies can be spent within CBRS units for certain exempted activities (e.g., a nature trail), after consultation with the Fish and Wildlife Service (FWS) (see [16 USC 3505](#) for exceptions to limitations on expenditures).

2. Indicate your selected course of action.

- After consultation with the FWS the project was given approval to continue
 → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map and documentation of a FWS approval.*
- Project was not given approval
Project cannot proceed at this location.

Worksheet Summary

Compliance Determination

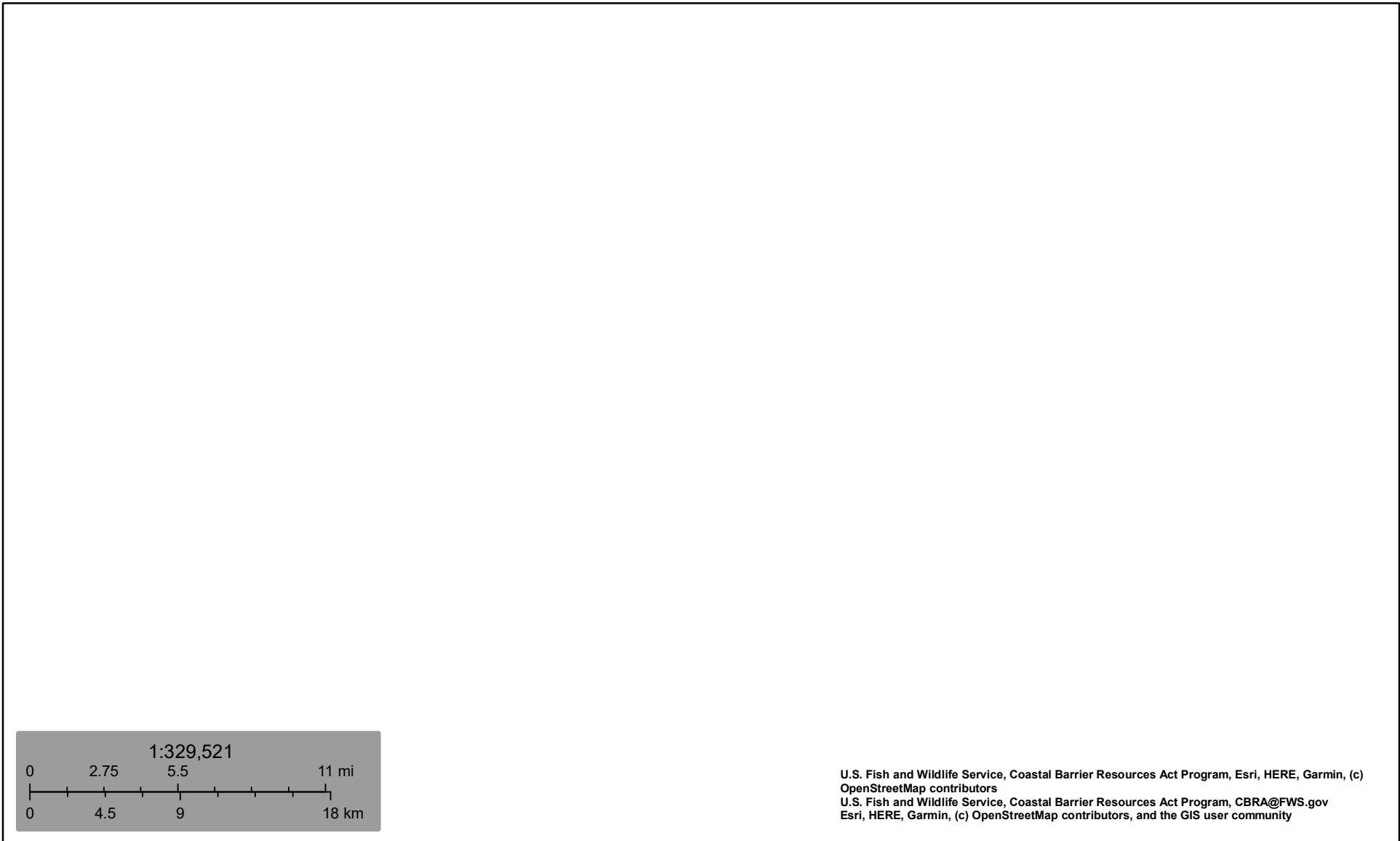
Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

Per the attached map, the coastal barrier zones in the state of Georgia are not located within the City of Brunswick.



Are formal compliance steps or mitigation required?

- Yes
 No



December 27, 2019

CBRS Units

-  Otherwise Protected Area
-  System Unit

This map is for general reference only. The Coastal Barrier Resources System (CBRS) boundaries depicted on this map are representations of the controlling CBRS boundaries, which are shown on the official maps, accessible at <https://www.fws.gov/cbra/maps/index.html>. All CBRS related data should be used in accordance with the layer metadata found on the CBRS Mapper website.

The CBRS Buffer Zone represents the area immediately adjacent to the CBRS boundary where users are advised to contact the Service for an official determination (<http://www.fws.gov/cbra/Determinations.html>) as to whether the property or project site is located "in" or "out" of the CBRS.

CBRS Units normally extend seaward out to the 20- or 30-foot bathymetric contour (depending on the location of the unit). The true seaward extent of the units is not shown in the CBRS mapper.

Coastal Zone Management

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

Coastal Zone Management (CZM). This threshold is triggered if the project is within the area covered by a Federally approved CZM Plan. In order to be approved, a consistency determination permit from CZ Commission or other jurisdictional authority is required.



The southeastern portion of Brunswick is located in a coastal zone. Due to the nature of the project activities, a preliminary finding that the demolitions are consistent with the CGMP and are not located in CBRA areas per the letter from Georgia Department of Natural Resources Coastal Resources Division on January 26, 2021.

Coastal Zone Management Act (CEST and EA)

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
References		
https://www.onecpd.info/environmental-review/coastal-zone-management		

Projects located in the following states must complete this form.

Alabama	Florida	Louisiana	Mississippi	Ohio	Texas
Alaska	Georgia	Maine	New Hampshire	Oregon	Virgin Islands
American Samona	Guam	Maryland	New Jersey	Pennsylvania	Virginia
California	Hawaii	Massachusetts	New York	Puerto Rico	Washington
Connecticut	Illinois	Michigan	North Carolina	Rhode Island	Wisconsin
Delaware	Indiana	Minnesota	Northern Mariana Islands	South Carolina	

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

Yes → *Continue to Question 2.*

No → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing that the site is not within a Coastal Zone.*

2. Does this project include activities that are subject to state review?

Yes → *Continue to Question 3.*

No → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation used to make your determination.*

3. Has this project been determined to be consistent with the State Coastal Management Program?

Yes, with mitigation. → *Continue to Question 4.*

Yes, without mitigation. → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation used to make your determination.*

No, project must be canceled.

Project cannot proceed at this location.

4. Explain in detail the proposed measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.

→ *Continue to the Worksheet Summary below. Provide documentation of the consultation (including the State Coastal Management Program letter of consistency) and any other documentation used to make your determination.*

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

The southeastern portion of Brunswick is located in a coastal zone. Due to the nature of the project activities, a preliminary finding that the demolitions are consistent with the CGMP and are not located in CBRA areas per the letter from Georgia Department of Natural Resources Coastal Resources Division on January 26, 2021.

Are formal compliance steps or mitigation required?

Yes

No

January 7, 2021

Ms. Kelie Moore
Federal Consistency Coordinator
Georgia Department of Natural Resources
Coastal Resources Division
One Conservation Way, Suite 300
Brunswick, GA 31520

**Re: Environmental Compliance Review
City of Brunswick Community Development Block Grant (CDBG) Program**

Dear Ms. Moore,

I am writing on behalf of the City of Brunswick. The City proposes to use CDBG funds to complete a spot demolition program as described in the enclosed activity description to remove vacant, blighted structures that pose a threat to health and safety. To fully comply with applicable National Environmental Protection Act (NEPA) procedures, the City is requesting your comments in relation to potential environmental impacts associated with the projects including impacts with respect to Coastal Zone Management.

The program involves the demolition of 1-4 unit single family housing units. The sites will be inspected prior to demolition and hazardous substances such as asbestos will be disposed of in accordance with the law. Therefore, we make a preliminary finding that the projects will have no effect on the environment relative to the NEPA thresholds, and we will proceed with the projects.

We request that your response be completed within 30 days of your receipt of this letter. No action will be taken to implement these undertakings for a period of 35 days from your receipt of our request. If no response is received within 35 calendar days from your receipt of this letter, it is assumed that you agree with our findings and the projects can proceed. Please contact me at 412-323-1950 or christined@mandl.net if you have any questions concerning the enclosed information.

Thank you for your consideration.

Sincerely,



Christine DeRunk
Housing and Community Development Specialist

Enclosures

Brunswick Community Block Grant Program Review: Rise Risley and Spot Demolition

Moore, Kelie <Kelie.Moore@dnr.ga.gov>

Tue 1/26/2021 3:26 PM

To: Christine DeRunk <christined@mandl.net>

Staff of the Georgia Coastal Management Program (GCMP) have reviewed your January 7, 2021 requests for review of potential environmental effects. We concur that both projects listed above (Rise Risley roof replacement and demolition of 1 – 4 unit single family housing units) are consistent with the GCMP and are not located in Coastal Barrier Resources Act (CBRA) areas.

Kelie Moore

Federal Consistency Coordinator

[Coastal Resources Division](#)

(912) 264-7218 | (912) 262-2334

[Follow us on Facebook](#)

[Buy a fishing license today!](#)

A division of the

GEORGIA DEPARTMENT OF NATURAL RESOURCES

Explosive and Flammable Hazards

Code of Federal Regulations, 24 CFR Part 51 Subpart C

Hazardous Operations Explosive or Flammable in Nature. This threshold is triggered if the project is in the vicinity of hazardous operation involving explosive or flammable fuels or chemicals which exceed the standards and application of HUD manual "Urban Development Siting with Respect to Hazardous Commercial and/or Industrial Facilities."

A thermal/explosive hazard is defined as:

- A storage tank, mobile tank, process vessel or transmission line used to store, process or transport hazardous products.

The environmental review record should include:

One of the following on aboveground storage tanks:

- A determination that the project does not include development, construction, rehabilitation that will increase residential densities, or conversion
- 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.

Note: If all containers within the search area fit the above criteria then project is ok

- A determination along with all supporting documentation that the separation distance of such containers from the project is acceptable
- Documentation of the existing or planned barrier that would serve as sufficient mitigation, including correspondence with a licensed engineer

AND one of the following on hazardous facilities:

- A determination that the project does not include a hazardous facility
- A determination along with all supporting documentation that the hazardous facility is located at an acceptable separation distance from residences and any other facility or area where people may congregate or be present
- Documentation of the existing or planned barrier that would serve as sufficient mitigation, including correspondence with a licensed engineer



The project does not include development, construction, rehabilitation that will increase residential densities, or conversion nor is the project related to a hazardous facility.

Explosive and Flammable Hazards (CEST and EA)

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
Reference		
https://www.hudexchange.info/environmental-review/explosive-and-flammable-facilities		

2. 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

→ *Continue to Question 2.*

Yes

Explain:

→ *Go directly to Question 5.*

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

No

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.*

Yes

→ *Continue to Question 3.*

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

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide all documents used to make your determination.*

Yes

→ *Continue to Question 4.*

4. Visit [HUD's website](#) to identify the appropriate tank or tanks to assess and to calculate the required separation distance using the [electronic assessment tool](#). To document this step in the analysis, please attach the following supporting documents to this screen:

- Map identifying the tank selected for assessment, and showing the distance from the tank to the proposed HUD-assisted project site; and
- Electronic assessment tool calculation of the required separation distance.

Based on the analysis, is the proposed HUD-assisted project site 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. Continue to the Worksheet Summary below.*

No

→ *Go directly to Question 6.*

5. Is the hazardous facility located at an acceptable separation distance from residences and any other facility or area where people may congregate or be present?

Please visit [HUD's website](#) for information on calculating Acceptable Separation Distance.

Yes

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide map(s) showing the location of the project site relative to residences and any other facility or area where people congregate or are present and your separation distance calculations.

No

→ Provide map(s) showing the location of the project site relative to residences and any other facility or area where people congregate or are present and your separation distance calculations.

Continue to Question 6.

6. For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Mitigation measures may include both natural and manmade barriers, modification of the project design, burial or removal of the hazard, or other engineered solutions. Describe selected mitigation measures, including the timeline for implementation, and attach an implementation plan. If negative effects cannot be mitigated, cancel the project at this location.

Note that only licensed professional engineers should design and implement blast barriers. If a barrier will be used or the project will be modified to compensate for an unacceptable separation distance, provide approval from a licensed professional engineer.

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

The project does not include development, construction, rehabilitation that will increase residential densities, or conversion nor is the project related to a hazardous facility.

Are formal compliance steps or mitigation required?

Yes

No

Farmland Protection

Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658

Farmland Protection Policy Act of 1981. This threshold is reached if a project involves the conversion of farmland to non-agricultural use. The environmental review must include a finding either that that the proposed HUD assisted project site does not include prime or unique farmland, or other farmland of statewide or local significance as identified by the Natural Resources and Conservation Service (NRCS), Department of Agriculture, or the project site includes prime farmland but is located in an area committed to urban uses. However, if the proposed project site includes farmland, the environmental review must include an evaluation of the land type by the NRCS using form AD 1006. This requirement applies only to assisted new construction activities and the acquisition of undeveloped land: 24 CFR 58.5(h) or 24 CFR 50.4(j).

The environmental review record should contain **one** of the following:

- A determination that the project does not include any activities, including new construction, acquisition of undeveloped land, or conversion, that could potentially convert one land use to another
- Evidence that the exemption applies, including all applicable maps
- Evidence supporting the determination that “Important Farmland,” including prime farmland, unique farmland, or farmland of statewide or local importance regulated under the FPPA does not occur on the project site
- Documentation of all correspondence with NRCS, including the completed AD-1006 and a description of the consideration of alternatives and means to avoid impacts to Important Farmland



The Farmland Protection Policy Act does not apply because the project does not include new construction, acquisition of undeveloped land or change in use of a property.

Farmlands Protection (CEST and EA)

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
Reference		
https://www.hudexchange.info/environmental-review/farmlands-protection		

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 → *Continue to Question 2.*
 No

Explain how you determined that agricultural land would not be converted:

Project does not involve acquisition of undeveloped land or changes in use of land or property in or near farmlands. Further, project is in an urbanized area and will not impact potential farmlands. Project is in compliance.

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documentation supporting your determination.*

2. Does “important farmland,” including prime farmland, unique farmland, or farmland of statewide or local importance regulated under the Farmland Protection Policy Act, occur on the project site?

You may use the links below to determine important farmland occurs on the project site:

- Utilize USDA Natural Resources Conservation Service’s (NRCS) Web Soil Survey <http://websoilsurvey.nrcs.usda.gov/app/HomePage.htm>
- Check with your city or county’s planning department and ask them to document if the project is on land regulated by the FPPA (zoning important farmland as non-agricultural does not exempt it from FPPA requirements)
- Contact NRCS at the local USDA service center <http://offices.sc.egov.usda.gov/locator/app?agency=nrcs> or your NRCS state soil scientist http://soils.usda.gov/contact/state_offices/ for assistance

No → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.*

Yes → *Continue to Question 3.*

3. Consider alternatives to completing the project on important farmland and means of avoiding impacts to important farmland.

- Complete form **AD-1006**, "Farmland Conversion Impact Rating" http://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb1045394.pdf and contact the state soil scientist before sending it to the local NRCS District Conservationist.

(NOTE: for corridor type projects, use instead form **NRCS-CPA-106**, "Farmland Conversion Impact Rating for Corridor Type Projects: http://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb1045395.pdf.)

- Work with NRCS to minimize the impact of the project on the protected farmland. When you have finished with your analysis, return a copy of form AD-1006 (or form NRCS-CPA-106 if applicable) to the USDA-NRCS State Soil Scientist or his/her designee informing them of your determination.

Document your conclusion:

- Project will proceed with mitigation.

Explain in detail the proposed measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide form AD-1006 and all other documents used to make your determination.*

- Project will proceed without mitigation.

Explain why mitigation will not be made here:

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide form AD-1006 and all other documents used to make your determination.*

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

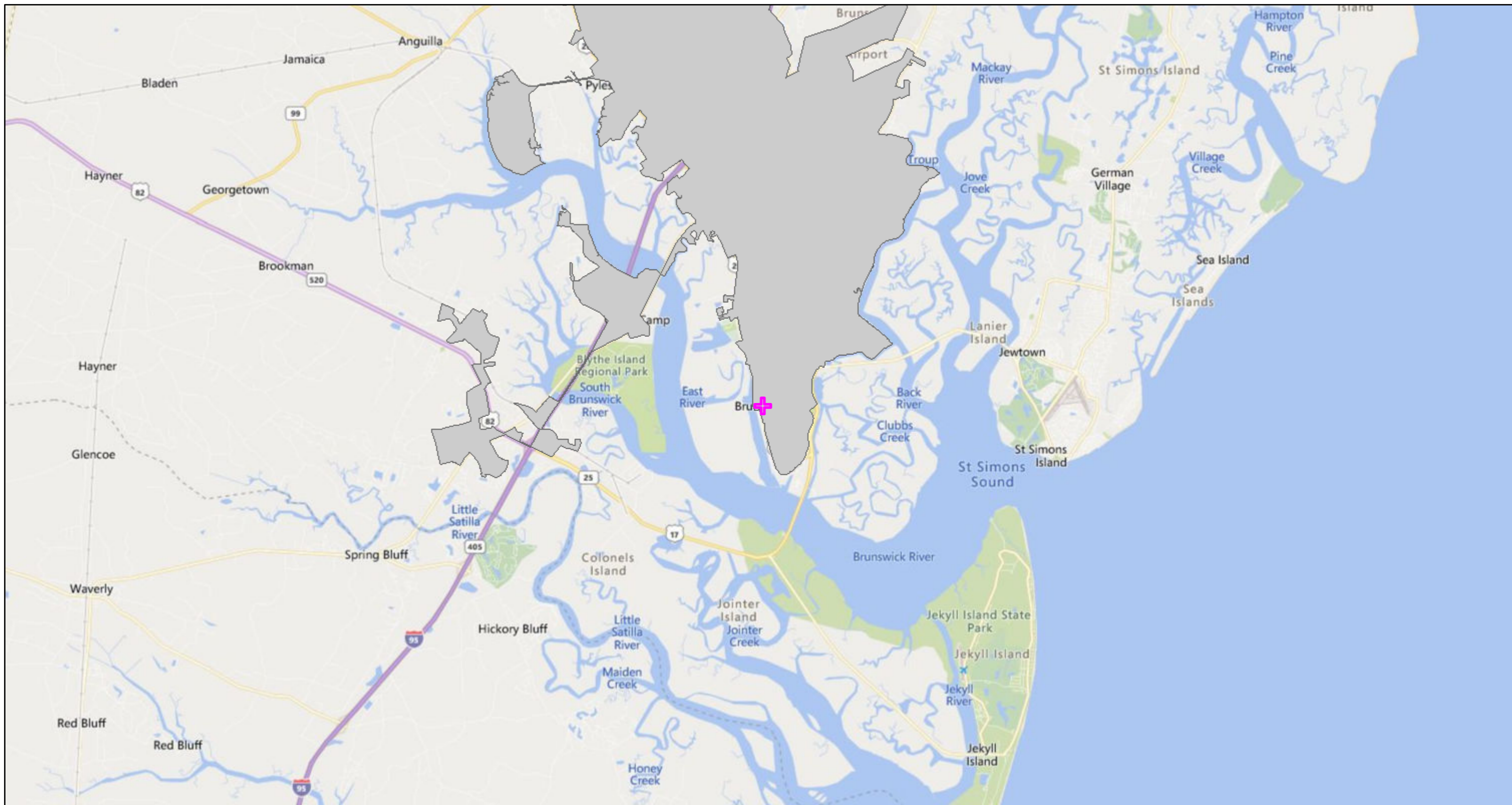
Project does not involve acquisition of undeveloped land or changes in use of land or property in or near farmlands. Further, project is in an urbanized area and will not impact potential farmlands. Project is in compliance.

Are formal compliance steps or mitigation required?



Yes

No

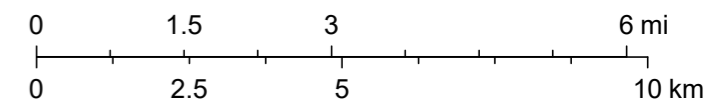
City of Brunswick Urbanized Lands



December 27, 2019

-  Search Result (point)
-  Urbanized Areas

1:144,448



Flood Insurance

Flood Disaster Protection Act of 1973 as amended (42 USC 4001-4128)

The Flood Disaster Protection Act of 1973 (42 U.S.C. 4012a) requires that projects receiving federal assistance and located in an area identified by the Federal Emergency Management Agency (FEMA) as being within a Special Flood Hazard Areas (SFHA) be covered by flood insurance under the [National Flood Insurance Program \(NFIP\)](#). In order to be able to purchase flood insurance, the community must be participating in the NFIP. If the community is not participating in the NFIP, federal assistance cannot be used in those areas.

Does this project involve mortgage insurance, refinance, acquisition, repairs, rehabilitation, or construction of a structure, mobile home, or insurable personal property?

If so, is the project excepted from flood insurance? There are four exceptions:

1. Formula grants made to states
2. Self-insured state-owned property within states approved by the Federal Insurance Administrator consistent with 44 CFR 75.11
3. Small loans (\$5,000 or less)
4. Assisted leasing that is not used for repairs, improvements, or acquisition

If not, is the structure, part of the structure, or insurable property located in a FEMA-designated Special Flood Hazard Area? Use [FEMA's Map Service Center](#) to make the determination.

If so, the community participating in the National Flood Insurance Program or has less than one year passed since FEMA notification of Special Flood Hazards? For loans, loan insurance or guarantees, the amount of flood insurance coverage must at least equal the outstanding principal balance of the loan or the maximum limit of coverage made available under the National Flood Insurance Program, whichever is less. For grants and other non-loan forms of financial assistance, flood insurance coverage must be continued for the life of the building irrespective of the transfer of ownership. The amount of coverage must at least equal the total project cost or the maximum coverage limit of the National Flood Insurance Program, whichever is less. If the community is not participating, or if its participation has been suspended, federal assistance may not be used for projects in the Special Flood Hazard Area.

The environmental review record should contain **one** of the following:

- Documentation supporting the determination that the project does not require flood insurance or is excepted from flood insurance
- A FEMA Flood Insurance Rate Map (FIRM) showing that the project is not located in a Special Flood Hazard Area
- A FEMA Flood Insurance Rate Map (FIRM) showing that the project is located in a Special Flood Hazard Area along with a copy of the flood insurance policy declaration or a paid receipt for the current annual flood insurance premium and a copy of the application for flood insurance in the review



This project does not involve mortgage insurance, refinance, acquisition, repairs, rehabilitation, or construction of a structure, mobile home, or insurable personal property and therefore does not trigger the threshold.

Flood Insurance (CEST and EA)

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).
Reference		
https://www.hudexchange.info/environmental-review/flood-insurance		

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. → *Continue to the Worksheet Summary.*

Yes → *Continue to Question 2.*

2. Provide a FEMA/FIRM map showing the site.

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 → *Continue to the Worksheet Summary.*

Yes → *Continue to Question 3.*

3. Is the community participating in the National Flood Insurance Program or has less than one year passed since FEMA notification of Special Flood Hazards?

Yes, the community is participating in the National Flood Insurance Program.

For loans, loan insurance or loan guarantees, flood insurance coverage must be continued for the term of the loan. For grants and other non-loan forms of financial assistance, flood insurance coverage must be continued for the life of the building irrespective of the transfer of ownership. The amount of

coverage must equal the total project cost or the maximum coverage limit of the National Flood Insurance Program, whichever is less

Provide a copy of the flood insurance policy declaration or a paid receipt for the current annual flood insurance premium and a copy of the application for flood insurance.

→ *Continue to the Worksheet Summary.*

Yes, less than one year has passed since FEMA notification of Special Flood Hazards.

If less than one year has passed since notification of Special Flood Hazards, no flood Insurance is required.

→ *Continue to the Worksheet Summary.*

No. The community is not participating, or its participation has been suspended.

Federal assistance may not be used at this location. Cancel the project at this location.

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

The project is not in a flood zone and requires no flood insurance. Please see the FIRM map attached.

Are formal compliance steps or mitigation required?

Yes

No

Noise Abatement and Control

Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978;
24 CFR Part 51 Subpart B

Noise Abatement and Control.

HUD’s noise standards may be found in 24 CFR Part 51, Subpart B. Noise is only applicable to New Construction and Rehabilitation of Residential Structures. For proposed new construction in high noise areas, the project must incorporate noise mitigation features. Consideration of noise applies to the acquisition of undeveloped land and existing development as well.

This threshold is reached if the project involves noise sensitive uses and the ambient noise level at the project site is above 65dB. This finding is based on the HUD Noise Assessment Guidelines (NAG) or other acoustical data.

Grantees will be required to determine the noise level of each unit if the answer to any of the following is “yes”:

- Is the property within 1,000 feet of major highway or roadway?
- Is the property within 3,000 feet of a railroad?
- Is the property within 15 miles of an airfield?

Noise Zone	Day-night average sound level (in decibels)	Special approvals and requirements
Acceptable	Not exceeding 65 dB	None
Normally Unacceptable	Above 65 dB but not exceeding 75 dB	<ul style="list-style-type: none"> • Environmental assessment and attenuation required for new construction • Attenuation strongly encouraged for major rehabilitation <p>Note: An environmental impact statement is required if the project site is largely undeveloped or will encourage incompatible development.</p>
Unacceptable	Above 75 dB	<ul style="list-style-type: none"> • Environmental impact statement required/Waiver may be applied for • Attenuation required for new construction with approval by the Assistant Secretary of CPD or Certifying Officer



This project is not a noise sensitive use. This project does not involve new construction or rehabilitation of residential structures.

Noise (CEST Level Reviews)

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
References		
https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control		

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

- New construction for residential use

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

→ *Continue to Question 4.*

- Rehabilitation of an existing residential property

NOTE: For modernization projects in all noise zones, HUD encourages mitigation to reduce levels to acceptable compliance standards. See 24 CFR 51 Subpart B for further details.

→ *Continue to Question 2.*

- A research demonstration project which does not result in new construction or reconstruction, interstate, land sales registration, or any timely emergency assistance under disaster assistance provisions 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

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.*

None of the above

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.*

2. Do you have standardized noise attenuation measures that apply to all modernization and/or minor rehabilitation projects, such as the use of double glazed windows or extra insulation?

Yes

Indicate the type of measures that will apply (check all that apply):

Improved building envelope components (better windows and doors, strengthened sheathing, insulation, sealed gaps, etc.)

Redesigned building envelope (more durable or substantial materials, increased air gap, resilient channels, staggered wall studs, etc.)

Other

Explain:

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below and provide any supporting documentation.*

No

→ *Continue to Question 3.*

3. 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).

Describe findings of the Preliminary Screening:

→ *Continue to Question 6.*

- 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.

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing the location of the project relative to any noise generators.*

Noise generators were found within the threshold distances.

→ *Continue to Question 5.*

- 5. Complete the Noise Assessment Guidelines to quantify the noise exposure. Indicate the findings of the Noise Assessment below:**

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

Indicate noise level here:

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide noise analysis, including noise level and data used to complete the analysis.*

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:

Is the project in a largely undeveloped area¹?

No

→Your project requires completion of an Environmental Assessment (EA) pursuant to 51.104(b)(1)(i). Elevate this review to an EA-level review.

Provide noise analysis, including noise level and data used to complete the analysis.

Continue to Question 6.

Yes

→Your project requires completion of an Environmental Impact Statement (EIS) pursuant to 51.104(b)(1)(i). Elevate this review to an EIS-level review.

Provide noise analysis, including noise level and data used to complete the analysis.

Continue to Question 6.

Unacceptable: (Above 75 decibels)

Indicate noise level here:

¹ A largely undeveloped area means the area within 2 miles of the project site is less than 50 percent developed with urban uses and does not have water and sewer capacity to serve the project.

Your project requires completion of an Environmental Impact Statement (EIS) pursuant to 51.104(b)(1)(i). You may either complete an EIS or provide a waiver signed by the appropriate authority. Indicate your choice:

Convert to an EIS

→ Provide noise analysis, including noise level and data used to complete the analysis.

Continue to Question 6.

Provide waiver

→ Provide an Environmental Impact Statement waiver from the Certifying Officer or the Assistant Secretary for Community Planning and Development per 24 CFR 51.104(b)(2) and noise analysis, including noise level and data used to complete the analysis.

Continue to Question 6.

- 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:

→ Provide drawings, specifications, and other materials as needed to describe the project's noise mitigation measures.

Continue to the Worksheet Summary.

No mitigation is necessary.

Explain why mitigation will not be made here:

→ Continue to the Worksheet Summary.

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

This project is not a noise sensitive use. This project does not involve new construction or rehabilitation of residential structures.

Are formal compliance steps or mitigation required?

Yes

No

Sole Source Aquifer

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

Sole Source Aquifers and Safe Drinking Water. This threshold is met when a project will occur in an area designated by EPA as a sole source aquifer.

The environmental review record should contain **one** of the following:

- Documentation, including a map, showing that the project site is not on a sole source aquifer
- A determination that the project consists solely of acquisition, leasing, or rehabilitation of existing buildings
- Documentation showing that a memorandum of understanding (MOU) or agreement with the EPA excludes your project from further review
- Documentation that EPA has reviewed and commented on the proposed action within an SSA and a description of any mitigation measures, if necessary



This project is in not within a sole source aquifer nor does it consist solely of acquisition, leasing, or rehabilitation of existing buildings.

Sole Source Aquifers (CEST and EA)

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
Reference		
https://www.hudexchange.info/environmental-review/sole-source-aquifers		

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

No → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation used to make your determination, such as a map of your project (or jurisdiction, if appropriate) in relation to the nearest SSA and its source area.*

Yes → *Continue to Question 2.*

2. Does your 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. Continue to the Worksheet Summary below.*

No → *Continue to Question 3.*

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

Contact your Field or Regional Environmental Officer or visit the HUD webpage at the link above to determine if an MOU or agreement exists in your area.

Yes → *Provide the MOU or agreement as part of your supporting documentation. Continue to Question 4.*

No → *Continue to Question 5.*

² A sole source aquifer is defined as an aquifer that supplies at least 50 percent of the drinking water consumed in the area overlying the aquifer. This includes streamflow source areas, which are upstream areas of losing streams that flow into the recharge area.

4. Does your MOU or working agreement exclude your project from further review?

Yes → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation used to make your determination and document where your project fits within the MOU or agreement.*

No → *Continue to Question 5.*

5. Will the proposed project contaminate the aquifer and create a significant hazard to public health?

Consult with your Regional EPA Office. Your consultation request should include detailed information about your proposed project and its relationship to the aquifer and associated streamflow source area. EPA will also want to know about water, storm water and waste water at the proposed project. Follow your MOU or working agreement or contact your Regional EPA office for specific information you may need to provide. EPA may request additional information if impacts to the aquifer are questionable after this information is submitted for review.

No → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide your correspondence with the EPA and all documents used to make your determination.*

Yes → *Work with EPA to develop mitigation measures. If mitigation measures are approved, attach correspondence with EPA and include the mitigation measures in your environmental review documents and project contracts. If EPA determines that the project continues to pose a significant risk to the aquifer, federal financial assistance must be denied. Continue to Question 6.*

6. In order to continue with the project, any threat must be mitigated, and all mitigation must be approved by the EPA. Explain in detail the proposed measures that can be implemented to mitigate for the impact or effect, including the timeline for implementation.

→ Continue to the Worksheet Summary below. Provide documentation of the consultation (including the Managing Agency's concurrence) and any other documentation used to make your determination.

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

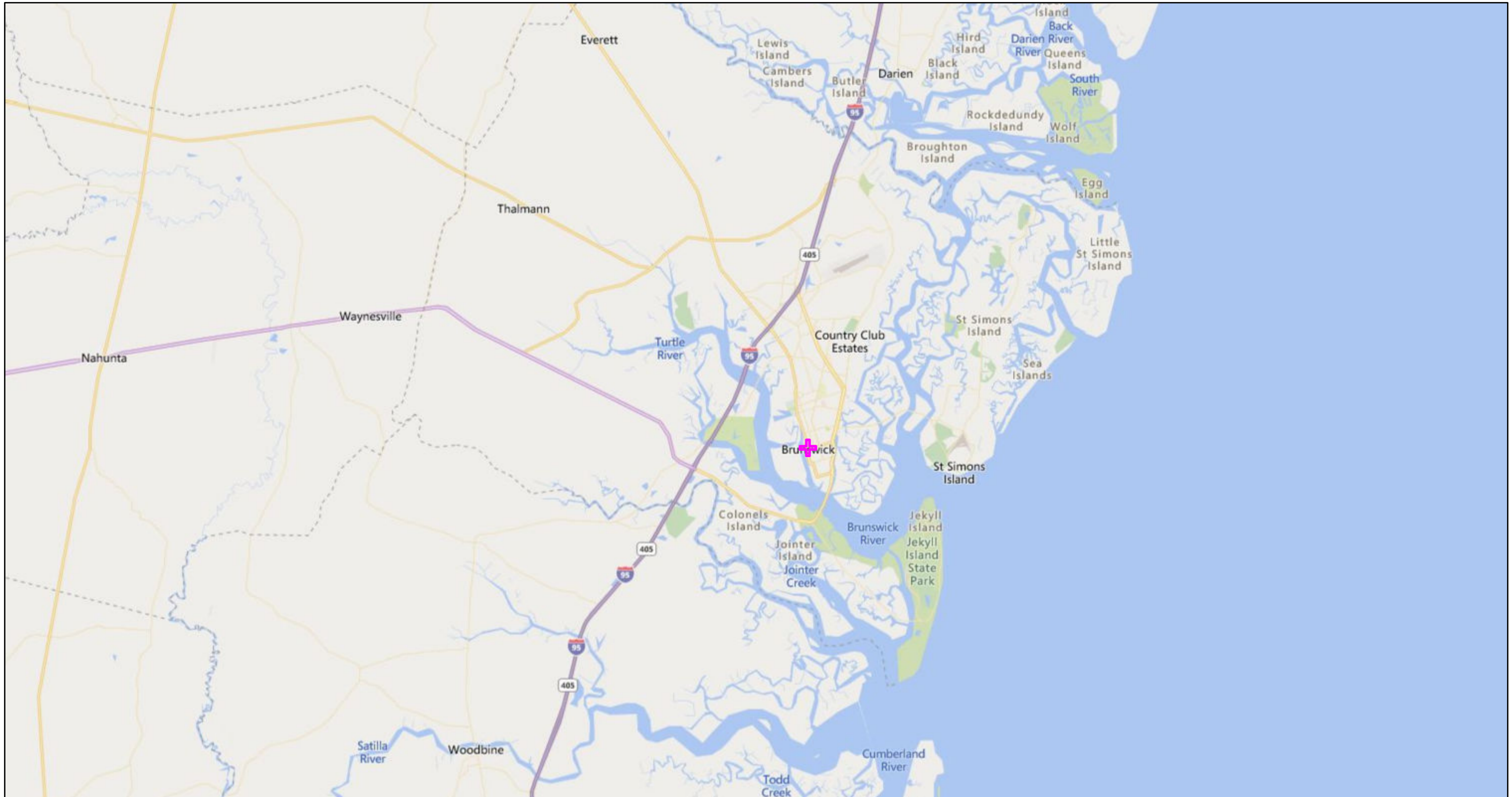
This project is in not within a sole source aquifer nor does it consist solely of acquisition, leasing, or rehabilitation of existing buildings.

Are formal compliance steps or mitigation required?




Yes

No

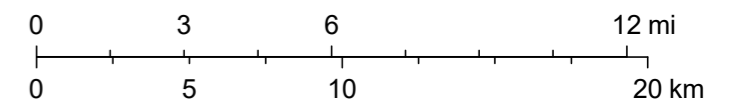
City of Brunswick Sole Source Aquifer/WSR



December 27, 2019

-  Search Result (point)
-  Sole Source Aquifers
-  Wild and Scenic Rivers

1:288,895



© 2019 Microsoft Corporation © 2019 HERE

Wetlands Protection

Executive Order 11990, particularly sections 2 and 5

Wetlands Protection. This threshold is triggered when the project is within, or will affect, a wetland. This finding is based on review of the General Plan or other document, or by field observation. Following the Water Resources Council 8-step procedure, the project may be approved if there is no practicable alternative outside the wetland area.

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.

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

If so, an 8-Step Process must be completed to determine that there are no practicable alternatives to wetlands development.

The environmental review record should contain **one** of the following:

- Documentation supporting the determination that an exception at 55.12(a)(3), 55.12(a)(4), 55.12(c)(3), 55.12(c)(7), or 55.12(c)(10) applies.
- Documentation supporting the determination that the project does not involve new construction (as defined in Executive Order 11990), expansion of a building's footprint, or ground disturbance.
- A map or other relevant documentation supporting the determination that the project does not impact an on- or off-site wetland.
- A completed 8-Step Process, including a map and the early and final public notices.



The project does not involve new construction (as defined in Executive Order 11990), expansion of a building's footprint, or ground disturbance.

Wetlands (CEST and EA)

General requirements	Legislation	Regulation
Executive Order 11990 discourages that 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.
References		
https://www.hudexchange.info/environmental-review/wetlands-protection		

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. Continue to the Worksheet Summary below.*

Yes → *Continue to Question 2.*

2. Will the new construction or other ground disturbance impact an on- or off-site wetland?

The term "wetlands" means those areas that are inundated by surface or ground water with a frequency sufficient to support, and under normal circumstances does or would support, a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bogs, and similar areas such as sloughs, potholes, wet meadows, river overflows, mud flats, and natural ponds. Wetlands under E.O. 11990 include isolated and non-jurisdictional wetlands.

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

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map or any other relevant documentation to explain your determination.*

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

→ *You must determine that there are no practicable alternatives to wetlands development by completing the 8-Step Process.*

Provide a completed 8-Step Process as well as all documents used to make your determination, including a map. Be sure to include the early public notice and the final notice with your documentation.

Continue to Question 3.

- 3. For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.**

Which of the following mitigation actions have been or will be taken? Select all that apply:

- Permeable surfaces
- Natural landscape enhancements that maintain or restore natural hydrology through infiltration
- Native plant species
- Bioswales
- Evapotranspiration
- Stormwater capture and reuse
- Green or vegetative roofs with drainage provisions
- Natural Resources Conservation Service conservation easements
- Compensatory mitigation

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

The project does not involve new construction (as defined in Executive Order 11990), expansion of a building's footprint, or ground disturbance.

Are formal compliance steps or mitigation required?

Yes

No

Wild and Scenic Rivers

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

Wild and Scenic Rivers. This threshold is reached when a project will have an effect on a river which is a component of the National Wild and Scenic Rivers system or is under consideration for inclusion in the system. This finding is based on geographical information provided by the National Wild and Scenic Rivers System.

Activities which could impact on the listed waterways requiring consultation are as follows:

1. Any new development in the area of a listed waterway.
2. Any water or sewer projects, especially if there is stream encroachment.
3. Recreation improvements in the area of a listed waterway

The environmental review record should contain **one** of the following:

- Evidence the proposed action is not within proximity to a designated Wild, Scenic, or Recreational River
- Documentation that contact was made with the Federal (or state) agency that has administrative responsibility for management of the river and that the proposed action will not affect river designation or is not inconsistent with the management and land use plan for the designated river area



Project locations are not located within the vicinity of a Wild and Scenic River, according to map attached. Project is in compliance.

Wild and Scenic Rivers (CEST and EA)

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
References		
https://www.hudexchange.info/environmental-review/wild-and-scenic-rivers		

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

Wild & Scenic Rivers: These rivers or river segments have been designated by Congress or by states (with the concurrence of the Secretary of the Interior) as wild, scenic, or recreational

Study Rivers: These rivers or river segments are being studied as a potential component of the Wild & Scenic River system.

Nationwide Rivers Inventory (NRI): The National Park Service has compiled and maintains the NRI, a register of river segments that potentially qualify as national wild, scenic, or recreational river areas

No

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation used to make your determination, such as a map identifying the project site and its surrounding area or a list of rivers in your region in the Screen Summary at the conclusion of this screen.

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

→ Continue to Question 2.

2. Could the project do *any* of the following?

- Have a direct and adverse effect within Wild and Scenic River Boundaries,

- Invade the area or unreasonably diminish the river outside Wild and Scenic River Boundaries, or
- Have an adverse effect on the natural, cultural, and/or recreational values of a NRI segment.

Consultation with the appropriate federal/state/local/tribal Managing Agency(s) is required, pursuant to Section 7 of the Act, to determine if the proposed project may have an adverse effect on a Wild & Scenic River or a Study River and, if so, to determine the appropriate avoidance or mitigation measures.

Note: Concurrence may be assumed if the Managing Agency does not respond within 30 days; however, you are still obligated to avoid or mitigate adverse effects on the rivers identified in the NWSRS

No, the Managing Agency has concurred that the proposed project will not alter, directly, or indirectly, any of the characteristics that qualifies or potentially qualifies the river for inclusion in the NWSRS.

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation of the consultation (including the Managing Agency's concurrence) and any other documentation used to make your determination.*

Yes, the Managing Agency was consulted and the proposed project may alter, directly, or indirectly, any of the characteristics that qualifies or potentially qualifies the river for inclusion in the NWSRS.

→ *Continue to Question 3.*

3. For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the proposed measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.

→ *Continue to the Worksheet Summary below. Provide documentation of the consultation (including the Managing Agency's concurrence) and any other documentation used to make your determination.*

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

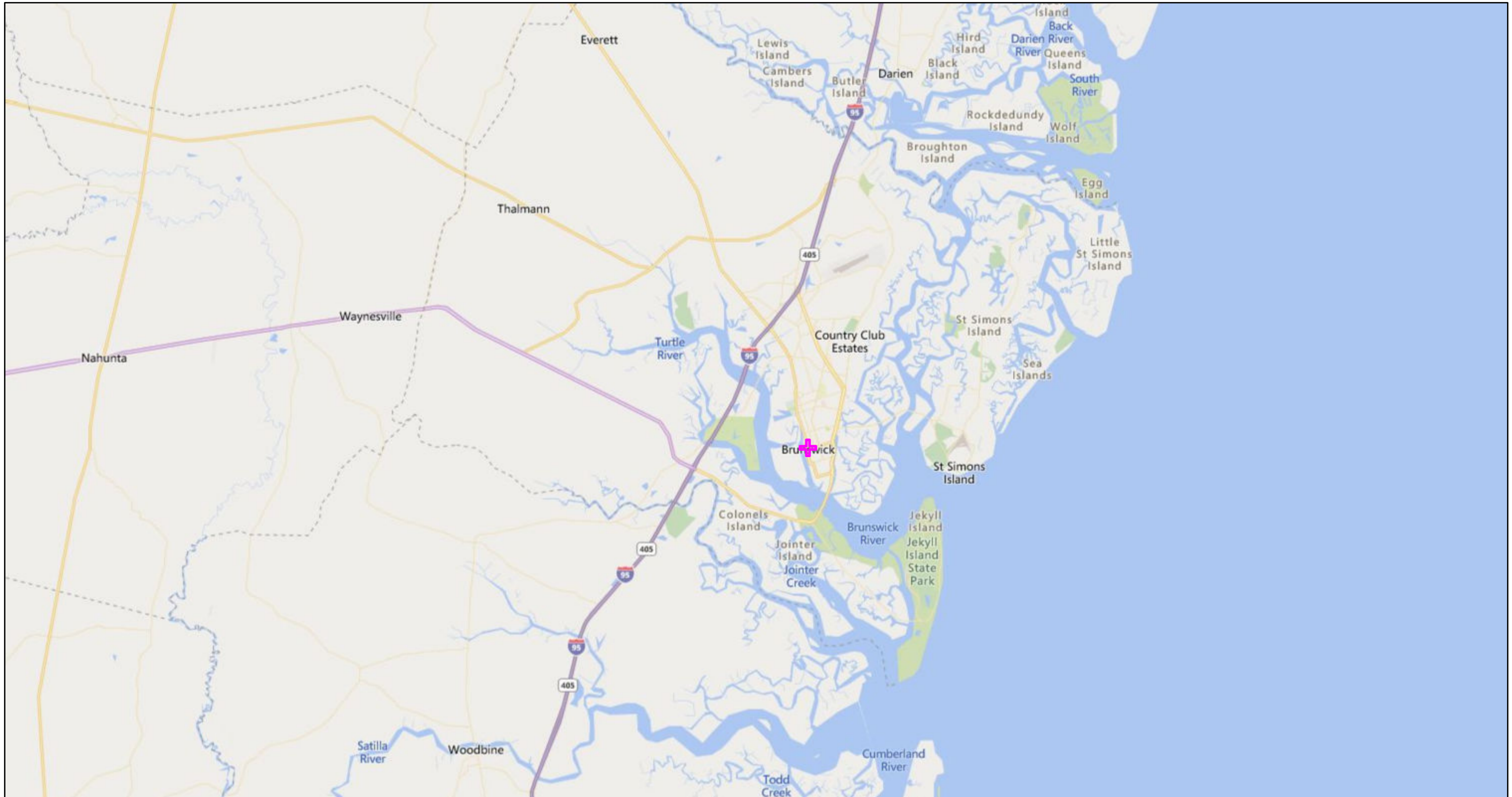
Project locations are not located within the vicinity of a Wild and Scenic River, according to map attached. Project is in compliance.

Are formal compliance steps or mitigation required?




Yes

No

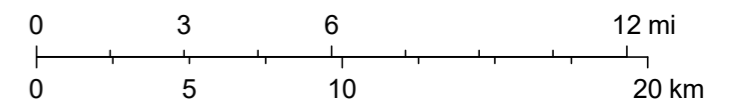
City of Brunswick Sole Source Aquifer/WSR



December 27, 2019

-  Search Result (point)
-  Sole Source Aquifers
-  Wild and Scenic Rivers

1:288,895



© 2019 Microsoft Corporation © 2019 HERE