**Tiered Environment Review**

**for Activity/Project that is**

**Categorically Excluded Subject to Section 58.5**

**Pursuant to 24 CFR 58.35(a)**

# Project Information

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| **Project Name:** | Energy-Effeciency,-Weatherization-and-Accessibility-Program |

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| **HEROS Number:** | 900000010110698 |

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| **Responsible Entity (RE):** | ST. LOUIS, 1520 Market St Saint Louis MO, 63103 |

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| **State / Local Identifier:** |  |

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| **RE Preparer:** | Rashonda Alexander |

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| **Certifying Officer:** | Lyda Krewson |

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

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| **Point of Contact:** |  |

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| **Consultant (if applicable):** |  |

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| **Point of Contact:** |  |

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| **Project Location:** | City of St. Louis, MO 63103 |

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| **Additional Location Information:** |
| Various locations across the City of St. Louis. |

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| **Direct Comments to:** | 1520 Market Street, St. Louis, MO 63103 |

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| **Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:** |
| This program will use $45,000 in CDBG funds to assist households with energy efficiency and weatherization repairs, along with accessibility modifications, where a senior aged 62 or over and/or a disable person resides in the City of St. Louis. This program does not involve new construction or conversion of land use. Accessibility repairs are limited to households where a disabled household member resides. All households must be at or below 80% of the Area Median Income (AMI) established by HUD. The program will benefit 25 households with an average of $300 per project, ranging from $100 to $500. Eligible repairs may include the following: Energy Efficiency aspects 1.) Install compact fluorescent bulbs 2.) Install low-flow faucet aerators in kitchen and bathroom 3.) Install low-flow shower head 4.) Install a leak detector for the toilet 5.) Energy Star qualified programmable thermostats, where a non-rated thermostat exists 6.) Energy efficiency LED or fluorescent lights (only in locations already existing, e.g. recessed ceiling mount can lighting fixtures) 7.) HVAC duct repair and sealing 8.) High efficiency toilets 9.) Replacement of leaking faucets to save water 10.) Install ceiling fans 11.) Weatherization and Energy Conservation aspects: 1.) Insulation in attic, between wall cavities and other areas 2.) Caulking around doors and windows 3.) Installation of weather stripping and window coverings 4. Energy saving windows (limit of two, and a lead clearance test will need to be obtained) 5.) Low-flow water closets 6. Caulking around plumbing penetrations, windows and exterior and interior door frames (openings) 7.) Installing new storm doors 8. Installing new entry doors with insulation and weather stripping 9. Installation of door sweeps. Accessibility Modifications Modifications which aid the mobility of physically disabled such as: 1.) Shower units with seats 2.) Faucet lever hardware 3.) Retrofitting toilets to achieve adequate height 4.) Moving power points and light switches 5.) Installation of grab bars 6.) Installing a flip handle lockset 7.) Installation of handrails 8.) Construction of wheelchair ramps 9.) Reconstructing doorways to allow for wheelchair entry 10.) Installation of offset hinges on doors for accessibility 11.) Lowering of sinks in kitchen and bathrooms 12.) Removing a threshold so that a wheelchair can move over it, which may entail floor repair. |

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

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| **Approximate size of the project area:** | more than 1 square mile |

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| **Length of time covered by this review:** | 1 Year |

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| **Maximum number of dwelling units or lots addressed by this tiered review:** |
| 25 |

#### Level of Environmental Review Determination:

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| Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at §58.5: |
| 58.35(a)(3) |

**Determination:**

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|  | Extraordinary circumstances exist and this project may result in significant environmental impact. This project requires preparation of an Environmental Assessment (EA); OR |
| ✓ | There are no extraordinary circumstances which would require completion of an EA, and this project may remain CEST. |

**Approval Documents:**

[EEWAP\_Carondelet\_MissouriEnergy\_sigpage.pdf](https://www.onecpd.info/reports/ESD_900000010110698_12032024_900000010524466_1575409843008.pdf)

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| **7015.15 certified by Certifying Officer on:** |  |

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| **7015.16 certified by Authorizing Officer on:** |  |

**Funding Information**

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| **Grant Number** | **HUD Program** | **Program Name** |
| B-20-MC-29-0006 | Community Planning and Development (CPD) | Community Development Block Grants (CDBG) (Entitlement) |

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| **Estimated Total HUD Funded Amount:** | $45,000.00 |

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| **Estimated Total Project Cost [24 CFR 58.2 (a) (5)]:** | $45,000.00 |

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

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| **Compliance Factors**:  Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6 | Was compliance achieved at the broad level of review? | Describe here compliance determinations made at the broad level and source documentation. |
| **STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6** | | |
| Airport Hazards | 🗹 Yes 🞎 No | The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements. See Attached. |
| Coastal Barrier Resources Act | 🗹 Yes 🞎 No | This project is located in a state that does not contain CBRA units. Therefore, this project is in compliance with the Coastal Barrier Resources Act. See Attached. |
| Flood Insurance | 🞎 Yes 🗹 No |  |
| **STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5** | | |
| Air Quality | 🗹 Yes 🞎 No | Based on program description and scope of work, the project will not generate new air emissions beyond the de minimus levels and would not require consideration under the SIP or further evaluation under the Clean Air Act. |
| Coastal Zone Management Act | 🗹 Yes 🞎 No | This project is located in a state that does not participate in the Coastal Zone Management Program. Therefore, this project is in compliance with the Coastal Zone Management Act. See Attached. |
| Contamination and Toxic Substances | 🞎 Yes 🗹 No |  |
| Endangered Species Act | 🗹 Yes 🞎 No | Based on the program description and scope of work, proposed program activities are not anticipated to represent an adverse effect with respect to this category because projects will not comprise major rehabilitation. Proposed program activity is minor home repair and weatherization and does not involve acquisition of undeveloped land, a change of land use, demolition, major rehabilitation, or new construction. |
| Explosive and Flammable Hazards | 🗹 Yes 🞎 No | Proposed program activity is minor home repair and weatherization and does not constitute an increase in unit density, a change in land use, construction activities of residential, industrial, commercial, institutional, or recreational structures, or a land use conversion. |
| Farmlands Protection | 🗹 Yes 🞎 No | The City of St. Louis, where all projects will occur, is classified as an Urbanized Area. This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is in compliance with the Farmland Protection Policy Act. See Attached. |
| Floodplain Management | 🗹 Yes 🞎 No | This program is not applicable to 24 CFR part 55 per 55.12b. The proposed project activity is minor home repair to existing residential buildings which do not occupy or modify the 100-year floodplain (or the 500-year floodplain for critical actions) or the wetland. The project is in compliance with Executive Order 11988. |
| Historic Preservation | 🞎 Yes 🗹 No |  |
| Noise Abatement and Control | 🗹 Yes 🞎 No | Based on the project description and scope of work, proposed activities are not anticipated to represent an adverse effect with respect to this category. Proposed program activity is minor home repair and weatherization (with an individual maximum cost of $500) and will not generate noise levels applicable to this factor. |
| Sole Source Aquifers | 🗹 Yes 🞎 No | The project is not located on a sole source aquifer. There are no designated sole source aquifers in the state of Missouri; the nearest one, the Mahomet Aquifer SSA in northern Illinois and Iowa, is approximately 90 miles away as indicated on the attached map. The project is in compliance with Sole Source Aquifer requirements. |
| Wetlands Protection | 🗹 Yes 🞎 No | Proposed project is minor home repair and weatherization, and wetlands will not be impacted by the scope of this work. The project is in compliance with Executive Order 11990. |
| Wild and Scenic Rivers Act | 🗹 Yes 🞎 No | According to the National Wild & Scenic Rivers Site, there are no designated Wild & Scenic Rivers, classified study rivers, or potentially eligible rivers listed on the Nationwide Rivers Inventory (NRI) within 1 mile of the City of St. Louis. Furthermore, proposed program is minor home repair, accessibility modifications, and weatherization which wild and scenic rivers not be impacted by the scope of this work. See Attached. |
| **ENVIRONMENTAL JUSTICE** | | |
| Environmental Justice | 🞎 Yes 🗹 No |  |

**Supporting documentation**

[Coastal Barrier Map.pdf](https://www.onecpd.info/reports/ESD_900000010110698_12032024_900000010521151_1575409843008.pdf)

[StL - Coastal Zone Management Act Boundary.pdf](https://www.onecpd.info/reports/ESD_900000010110698_12032024_900000010521152_1575409843008.pdf)

[Farmlands protection\_Urbanized Area Reference Map.pdf](https://www.onecpd.info/reports/ESD_900000010110698_12032024_900000010522168_1575409843008.pdf)

[sole source aquifiers.pdf](https://www.onecpd.info/reports/ESD_900000010110698_12032024_900000010521154_1575409843008.pdf)

[StL-Wild Scenic Rivers.pdf](https://www.onecpd.info/reports/ESD_900000010110698_12032024_900000010521155_1575409843008.pdf)

[STL Airport Maps.pdf](https://www.onecpd.info/reports/ESD_900000010110698_12032024_900000010521150_1575409843008.pdf)

**Written Strategies**

The following strategies provide the policy, standard, or process to be followed in the site-specific review for each law, authority, and factor that will require completion of a site-specific review.

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| **1** |  | Flood Insurance |
|  | Step 1. Determine if the project involves financial assistance for construction, rehabilitation, or acquisition of a mobile home, building, or insurable personal property or the purchase of machinery, equipment, fixtures, or furnishings that are insurable under NFIP. If the project does not involve any of these, proceed to Step 4a. Step 2. If your project includes any of the activities listed in Step 1, determine if the structure, part of the structure, or insurable property is located in a FEMA-designated Special Flood Hazard Area. Use the Flood Map Service Center. If not in a Special Flood Hazard Area, proceed to Step 4b. Step 3. If your project is located in a Special Flood Hazard Area, the community must participate in the National Flood Insurance Program. Proceed to Step 4c. Step 4. Make a determination: There are three possible determinations applicable to Flood Insurance: a. Not applicable. The project does not involve financial assistance for construction, rehabilitation, or acquisition of a mobile home, building, or insurable personal property or the purchase of machinery, equipment, fixtures, or furnishings that are insurable under NFIP. Your ERR should include: Documentation supporting your determination. b. Not applicable. The project is not located in a Special Flood Hazard Area. Your ERR should include: A FEMA map showing the project is not located in a Special Flood Hazard Area. c. Flood Insurance is required. Your ERR should include: A FEMA map showing the project is located in a Special Flood Hazard Area. 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. Step 5. Note your determination on the statutory checklist found in your ERR Guide and attach supporting documents. |
| **2** |  | Contamination and Toxic Substances |
|  | Step 1. Use NEPA Assist to determine if your project site is (a) listed on an EPA Superfund National Priorities or CERCLA List, (b) located within 3,000 feet of a toxic solid waste landfill site (RCRA or TRI listing), or (c) your project site has an underground storage tank. For any of these conditions, additional research, testing of suspected materials, engagement of an environmental consultant, and/or a ASTM Phase I report may be required. Step 2. Review databases maintained by MO ESTART and GEO STL to screen for potential on-site and off-site facilities that could pose health and safety problems and toxic clean-up sites that are presently under analysis or remediation. Step 3. Perform a site inspection of the project site and adjacent properties using the Site-Specific Field Contamination Checklist form. Step 4. Investigate previous uses of the site. Research may include building and use permit records; Sanborn Co. maps; interviewing property owners or managers; analyzing local land use databases, records, permits, and violations; and consulting with planning or community development staff. Step 5. If site conditions or research indicate that the subject property is contaminated or likely contaminated by toxic substances, hazardous materials or petroleum products, additional research, testing of suspected materials, engagement of an environmental consultant, and/or a Phase I report may be required. Any hazards that are identified should be evaluated for the potential to affect the health and safety of the occupants and end-users. Step 6. Determine if your project is likely to disturb asbestos containing materials or lead based paint or if your project site is likely to have mold or radon present by testing. If any of these conditions are likely, contact a qualified professional to perform tests and determine appropriate mitigation. Disturbing or removing asbestos will require a state air quality permit. Step 7. Make a determination: There are three possible determinations applicable to hazardous facilities: a. The site is not contaminated. Your ERR should include: Documentation (including map) of your CERCLA, RCRA, eStart, and/or TRI search (Using NEPA Assist). Any supporting documentation including review of federal, state, and local environmental quality databases, land use records, consultation records, etc. Site contour information for gradients can be obtained from the USGS National Map. (https://viewer.nationalmap.gov/advanced-viewer/) Completed site inspection form (and photos, if any). Any test results performed by qualified professionals. b. The hazard will not affect health and safety of the occupants or conflict with the intended use of the site, including any mitigation measures used. Your ERR should include: Documentation (including map) of your CERCLA, RCRA, and TRI search (Using NEPA Assist). Any supporting documentation including review of federal, state, and local environmental quality databases, land use records, consultation records, etc. Completed site inspection form. Test results performed by qualified professionals. c. The site has been cleaned up according to EPA or state standards for residential properties, which requires a letter of "No Further Action" from the appropriate state department/agency, or a "Response Action Outcome" letter from the Licensed Site Remediation Professional. |
| **3** |  | Historic Preservation |
|  | Step 1. Submit Request for Section 106 Review to the Cultural Resource Office Step 2. Note the determination on the statutory checklist found in your ERR Guide and attach supporting documents. |
| **4** |  | Environmental Justice |
|  | Step 1. Determine if your project creates adverse environmental impacts. If no adverse environmental impacts are anticipated, proceed to Step 5a. Step 2. If you anticipate adverse environmental impacts you must attempt to eliminate the impact, select another alternative, minimize the impact, document findings. Step 3. If an adverse impact remains, determine if low-income and/or minority populations will be disproportionately affected. Use the EPA's EJSCREEN to access demographic and income data for your project area. Proceed to Step 5b if low-income and/or minority populations will not be disproportionately affected. Step 4. Mitigate adverse impacts: Engage the affected community in meaningful participation about mitigating the impacts or move the project to another community, then proceed to Step 5c. Step 5. Make a Determination: There are three possible determinations applicable to Environmental Justice: a. No adverse environmental impacts. ERR should include: Evidence that the proposed action will not create an adverse environmental impact or aggravate an existing impact at the project site and surrounding neighborhood. b. Adverse environmental impacts will not disproportionately affect low-income or minority populations. ERR should include: Evidence that the project is not in an environmental justice community of concern (using the EPA's EJSCREEN) or evidence that the project does not disproportionately affect a low-income or minority population. Describe how the proposed action will not have a disproportionate adverse impact on minority or low-income populations. c. Adverse environmental impacts on low-income and/or minority populations. ERR should include: Documentation that the affected community residents have been meaningfully informed and involved in a participatory planning process to address (remove, minimize, or mitigate) the adverse effect from the project and the resulting changes. Step 6. Note determination on the statutory checklist found in the ERR Guide and attach supporting documents. |

**Supporting documentation**

[HUD Site Specific Field Contamination Checklist.pdf](https://www.onecpd.info/reports/ESD_900000010110698_12032024_900000010521243_1575409843008.pdf)

**APPENDIX A: Site Specific Reviews**