

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

Project Information

Project Name: CPLC-Rental-Development-Casa-Grande

HEROS Number: 900000010287029

Responsible Entity (RE): PINAL COUNTY, P.O. 1348 Florence AZ, 85132

RE Preparer: Staci Parisi

State / Local Identifier:

Certifying Officer: Leo Lew

Grant Recipient (if different than Responsible Entity):

Point of Contact:

Consultant (if applicable):

Point of Contact:

Project Location: 315 West Main Avenue, Casa Grande, AZ 85122

Additional Location Information:

The subject property parcels are located at: Site 1: 315 W Main Ave, Casa Grande, AZ 85112 (APN's 507-13-1670, 507-07-2370) Site 2: 202 S Top & Bottom St, Casa Grande, AZ 85112 (507-07-2870, 507-07-2880, 507-07-2890) Site 3: 401 E 3rd St, Casa Grande, AZ 85112 (507-07-2070, -2080, -2090, -2100, 2110, 2120, 2130, 2140, 2150) Site 4:

209 W Main Ave, Casa Grande, AZ 85112 (APN's 507-07-2380, 507-07-2390) Site 5:
107 W Main Ave, Casa Grande, AZ 85112 (507-07-2430, 507-07-2440)

Direct Comments to:

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

Chicanos Por La Causa (CPLC) is proposing new construction of a scattered site residential development project offering 176 units in a mix of one, two, and three-bedroom apartments for households earning up to 80% Area Median Income (AMI). The low-rise affordable housing project will sit on five city owned lots within the City of Casa Grande Downtown and Historic District. The City of Casa Grande has rezoned the parcels in the downtown encouraging a mix of higher residential density, commercial, and retail uses; it also concentrates new neighborhood growth in areas where assured water supplies exist, and construction of new infrastructure is fiscally feasible and attractive to families. The sites identified total approximately six acres. CPLC will acquire the lots from the city to create quality, sustainable affordable housing in Casa Grande, which severely lacks housing options for workforce and low-income households. The subject property parcels are located at: 315 W Main Ave, Casa Grande, AZ 85112; 209 W Main Ave, Casa Grande, AZ 85112; 202 S Top & Bottom St, Casa Grande, AZ 85112; 107 W Main Ave, Casa Grande, AZ 85112; and 401 E 3rd St, Casa Grande, AZ 85112. The subject property parcels are currently undeveloped desert land designated for residential use. As the subject property parcels are undeveloped, no operations currently take place on-site. According to available historical sources, the subject property parcels have been undeveloped desert land since at least 1936. The immediately surrounding properties to the north, south, east, and west consist of either undeveloped desert, single-family residences, and/or residential streets followed by undeveloped desert and/or single-family residences. The project will be completed during FY 2022, FY 2023, and FY 2024 using PY 2020, PY 2021, PY 2022, and PY 2023 HOME funds at an estimated total project cost of \$44,935,203. HOME funding will be used to pay for \$950,000 of the total project cost. The \$950,000 of HOME funding will support the development and construction of six affordable rental housing units within the proposed project to be occupied by low income households.

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

The purpose of the proposed project is to develop 5 vacant lots into townhomes and apartment buildings to provide affordable housing in the City of Casa Grande area. There is a need for investment in affordable housing throughout the state of Arizona. The proposed project is expected to achieve three primary outcomes: 1) provide a decent, safe, and affordable living environment for low-income individuals; 2) improve the quality of life of tenants by making essential services available in a non-coercive environment; 3) contribute to the revitalization of the surrounding neighborhood.

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

Pre-COVID 19, the real estate market was thriving, but also was creating a market that was quickly becoming unaffordable for working and low-income families. Today, we know that the need for quality and affordable housing is needed more than ever before. This project will create a mixed income housing for low-income families

located in Casa Grande's Downtown area. The proposed project is a new construction residential development offering 176 units in a mix of one, two and three-bedroom apartments for households up to 80% AMI. Due to the nature and location of this development, families and individuals will have easy access to food hubs, education facilities and quality jobs. The proximity to resources from this site includes - Food City .2 miles, Casa Grande Farmers Market 1.1 miles, Mercado y Carniceria 0.6 miles; Health Care-El Sol Home Health Agency 0.6 miles, Banner Casa Grande medical Center 2.5 miles, Accentcare 2.2 miles. Most recently Lucid Motors new factory where it will build its luxury electric sedan. In 2023 a second facility will be ready for operations. It is anticipated that the two phases will bring 4,800 direct and indirect jobs by 2029. The project shall limit all of its units to residents with at or below 80% of AMI. Additionally, CPLC will staff the Project with a Resident Service Coordinator who will link all low-income households to resources that will enhance their stability and quality of life. Lastly, the project will promote the principles and practices behind the Energy Star certification not only to save tenants money with respect to their utility allowance, the project will increase building efficiency, ensure credibility and accountability for the development team and an ethical system for sustainability. According to the Arizona Housing at-a-glance 2019 report prepared by the Arizona Department of Housing, Arizona's median household income grew by 21.5 percent over the last five years, well above the U.S. average of 12.5 percent, and just in the first quarter of 2019, personal incomes in Arizona grew 5.5 percent over the final quarter of 2018, again ahead of the national average. From 2016-2017, more than 88,000 people lifted themselves out of poverty in Arizona, an 8 percent decrease compared to 3.8 percent nationwide during that same time period. Construction of affordable housing is therefore very critical to continue this positive trend.

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

[Site Map.pdf](#)

Determination:

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

Approval Documents:

7015.15 certified by Certifying Officer
on:

7015.16 certified by Authorizing Officer
on:

Funding Information

Grant / Project Identification Number	HUD Program	Program Name
M-20-UC-04-0222	Community Planning and Development (CPD)	HOME Program
M-21-UC-04-0222	Community Planning and Development (CPD)	HOME Program
M-22-UC-04-0222	Community Planning and Development (CPD)	HOME Program
M-23-UC-04-0222	Community Planning and Development (CPD)	HOME Program

Estimated Total HUD Funded, Assisted or Insured Amount: \$950,000.00

This project anticipates the use of funds or assistance from another federal agency in addition to HUD in the form of:

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$44,935,203.00

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

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6	Are formal compliance steps or mitigation required?	Compliance determination (See Appendix A for source determinations)
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6		
Airport Hazards Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There are no military airports within 15,000 feet of the subject property or civil airport runways within 2,500 feet of the subject property. It is also not located within the airport's clear zone or noise contours. The proposed undertaking is in compliance with HUD's

		<p>Airport Hazard regulations and no mitigation is warranted. The site is located 6.41 mi from the Casa Grande Municipal Airport, 13 mi from the Eloy Municipal Airport, 14.52 mi from the Mariposa Municipal airport, and 23.51 mi from Coolidge Municipal airport. Determination: The project is in compliance with Airport Hazards requirements. Source (s) / Documentation: Federal Aviation Administration (FAA) https://oeaaa.faa.gov/oeaaa/external/searchAction.jsp?action=showCircleSearchAirportsForm Environmental Protection Agency (EPA) http://nepassisttool.epa.gov/nepassist/entry.aspx</p>
<p>Coastal Barrier Resources Act Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Project lots are located in HUD Region IX (CA, AZ, NV, HI, Guam) have no coastal barrier resources. The subject properties are not located within a Coastal Barrier Resource Area. The project is in compliance with the Coastal Barrier Resources Act and related laws and regulations. Source (s) / Documentation: Coastal Barrier Resource Area http://www.fws.gov/CBRA/Maps/index.html</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><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The subject property is located in Shaded Zone X, FEMA Map #04021C1170E effective December 4, 2007. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with flood insurance requirements. Source (s) / Documentation: FEMA Flood Map Service Center https://msc.fema.gov/portal/home Federal Emergency Management</p>

		Agency (FEMA) https://msc.fema.gov/portal/home
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5		
Air Quality Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The Project's air quality management district Pinal County is in Pm10 and Ozone nonattainment status. Project area is located in a Non-Attainment Area for PM 10 and 8-hour ozone. Projects activities involving ground disturbance of greater than 1/10 acre will require a dust control permit. Other than brief period of construction, projects will have no negative impact on air quality issues or community pollution levels. Dust control measures and a Dust Permit Application are required under the Pinal County regulations. Since the result is little to no impact on air quality, the project includes no activities that would require further evaluation under the Clean Air Act. The Project is in compliance with the Clean Air Act. Source (s) / Documentation: Pinal County Dust Information https://www.pinalcountyz.gov/AirQuality/Dust/Pages/Home.aspx https://www.pinalcountyz.gov/airquality/pages/airqualityreport.aspx
Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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.
Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Site contamination was evaluated as follows: ASTM Phase I ESA, ASTM Phase II ESA. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. The project is in compliance with contamination and toxic substances requirements. The Tier 1 Primary Screening, conducted as part of the

		<p>Phase I Site Assessment, indicated that there were no findings of potential hazards associated with contamination and toxic substances. According to the database, there were no evaluations, violations, or enforcement actions filed, nor citations, inspections, or enforcement actions documented in the agency file. Out of the 5 lots included in the project, 315 W Main Street parcel had a Phase II and remediation completed by Western Technologies Inc. in July 2021. Site remediation was conducted and 18-inch soil samples collected from the bottom of the excavation that were below the ADEQ residential soil remediation levels. Therefore, the site is fully clear from any hazardous wastes and clean, and ready for land development.</p>
<p>Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Based on the desktop review of the endangered species mapping, the projects will have "no effect" or "are not likely to adversely affect" any federally protected (listed or proposed) Threatened or Endangered Species (i.e., plants or animals, fish, or invertebrates), nor adversely modify designated critical habitats. The closest species is the Southwestern Willow Flycatcher, <i>Empidonax trillii extimus</i>. It has been concluded that there is no significant impact on the environment and its surroundings. The projects will have No Effect on the listed species, which are in compliance with the Endangered Species Act. Source (s) / Documentation: https://ecos.fws.gov/ecp0/reports/species-listed-by-state-report?state=AZ&status=listed https://fws.maps.arcgis.com/home/webmap/viewer.html?webmap=9d8de5e265ad4fe09893cf75b8dbfb77 U.S. Fish &</p>

		Wildlife Service https://ecos.fws.gov/ipac/
<p>Explosive and Flammable Hazards Above-Ground Tanks[24 CFR Part 51 Subpart C</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The Phase I ESA (page 5) finds that no evidence of current or former ASTs or USTs were observed during the site visit (06/12/2021) and assessment, nor were any found within one mile of the project location. There is no evidence of hazardous materials or facilities within the projects. Project activities involve revitalization of community including infill housing development on vacant lots. Out of the 5 lots, 315 W. Main Street parcel had a Phase II and remediation completed by Western Technologies Inc. in July 2021. Site remediation was conducted and 18-inch soil samples collected from the bottom of the excavation that were below the ADEQ residential soil remediation levels. Therefore, the site is fully clear from any hazardous wastes and clean, and ready for land development. The Project is in compliance with explosive and flammable hazard requirements. Source (s) / Documentation: Phase I ESA, July 12, 2021 by Western Technologies Inc.</p>
<p>Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>According to the USDA's Natural Resource Conservation Service Soil Survey map that focuses on the soil depictions on Pinal County, AZ., the site location falls in residential zone areas, and soil that is classified as farmland of unique importance. Even though the current designation of the land is "farmland of unique importance", based on the HUD guidelines a finding of compliance with the requirements of the Farmland Protection Policy Act of 1981 (7 U.S.C. 4201 et seq.) must be made for assisted new construction activities, the acquisition of undeveloped land, and conversion projects. Since the Project is located on a land already in or committed to urban</p>

		<p>development (7 CFR 658.2(a)), project is in compliance with the Farmland Protection Policy Act of 1981. USDA Natural Resources Conservation Services (NRCS) Web Soil Survey https://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm</p>
<p>Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Project lots locations are not within a 100 year flood area, as seen from the FEMA Flood Map. Property is in Zone X, outside the 100-year floodplain. There are no Special Flood Hazard Areas in the area. The Project is in compliance with Executive Order 11988. Source (s) / Documentation: FEMA National Flood Hazard ArcGIS Mapper http://arcg.is/2lcM06t Federal Emergency Management Agency (FEMA) https://msc.fema.gov/portal/home</p>
<p>Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Based on Section 106 consultation the project will have No Adverse Effect on historic properties. Conditions: null. Upon satisfactory implementation of the conditions, which should be monitored, the project is in compliance with Section 106. An official Section 106 SHPO and THPO consultation has been initiated by CPLC on July 20, 2022. A concurrence of No Adverse Effects, conditioned on further consultation with SHPO as design progresses, was received from Arizona SHPO on September 23, 2022. Total 8 tribes were also consulted. Several of them submitted their concurrence. The projects will be in compliance with the required consultation process. Source (s) / Documentation: Received SHPO and tribal concurrence letters to date.</p>
<p>Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>A Noise Assessment was conducted. The noise level was acceptable: 50.0 db. See noise analysis. The project is in compliance with HUD's Noise regulation. The nearest railroad is within</p>

		<p>50 ft. of the site location. The nearest airport, the Casa Grande Municipal Airport, is more than approximately 6.41 miles from the project sites, further than the 15,000 ft. Based on the HUD ATEC noise calculation, DNL is not expected to be above 70.</p>
<p>Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The Project is not located within any Sole Source Aquifer Designation Zones protected by the Safe Drinking Water Act. The project is in compliance with HUD's Sole Source Aquifer regulations. Source (s) / Documentation: Environmental Protection Agency (EPA) NEPAassistmap. https://nepassisttool.epa.gov/nepassist/analysis.aspx https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=9ebb047ba3ec41ada1877155fe31356b</p>
<p>Wetlands Protection Executive Order 11990, particularly sections 2 and 5</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Based on information from the U.S. Fish & Wildlife Service, projects are within 0.5 mi of NWI designated wetland areas. The proposed project will not impact on- or off-site wetlands. No surface impoundments, wetlands, natural catch basins, ponds or lagoon are located on the subject property. No potential Waters of the U.S. or wetlands are present in the project area. Based on the Project location, a Clean Water Act permit or Section 401 certification is not required/triggered. The Project is in compliance with Executive Order 11990. Source (s) / Documentation: Environmental Protection Agency (EPA) NEPAassist https://www.fws.gov/wetlands/data/Mapper.html See Attached Document Section. https://www.epa.gov/nepa/nepassist</p>
<p>Wild and Scenic Rivers Act Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>There are no Wild and Scenic Rivers in the vicinity of the subject property. The Project is in compliance with the Wild and Scenic Rivers Act. Source (s) /</p>

		Documentation: National Wild & Scenic Rivers https://www.rivers.gov/map.php
HUD HOUSING ENVIRONMENTAL STANDARDS		
ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The Project provides affordable housing for low-income families. The project will not result in disproportionately high or adverse human health or environmental impact on a minority population, low-income population, or Indian tribe because there are no such health risks present. No adverse environmental impacts were identified in the project's total environmental review. Projects are in compliance with Executive Order 12898. Source (s) / Documentation: Environmental Justice Map Environmental Protection Agency https://www.epa.gov/ejscreen

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

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

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

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	The subject property consists of five noncontiguous parcels located within a residential area of Pinal County, Arizona. As the subject property parcels are undeveloped, no operations currently take place on-site. During the vicinity reconnaissance, Phase I consultant, Partner, observed the following land use on properties in the immediate vicinity of the subject property: North, South, East, West: Undeveloped desert,	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		single-family residences, and/or a residential street beyond which is undeveloped desert and/or single-family residences. According to the Planning and Zoning map accessed the subject property is currently vacant and zoned future single-family residential and the proposed development is in compliance with local zoning ordinances.	
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2	According to the USGS Topographic Quadrangle: Arizona 2018, the topography of the site slopes to the southwest. On-site drainage at the subject property is suspected to consist of flow along the asphalt parking areas to strategically located storm drains and surface percolation and flow along the natural topography in the unpaved areas.	
Hazards and Nuisances including Site Safety and Site-Generated Noise	2	No nuisances or hazards were observed at the subject property or surrounding properties during the subject property inspection on May 1st 2020 by Phase I ESA Consultant, Partner. The subject property is situated within the southern portion of the Upper Pinal County Sub-basin (Amado- Tubac Basin) of the Basin and Range Physiographic Province, which is characterized by alluvial plains separated by predominantly north to northwest trending mountain ranges. The proposed development activities will not result in any significant noise generation levels within the neighborhood, nor will it result in the neighborhood being exposed to noise levels in excess of General Plan policies. Construction phase noise will be mitigated by standard procedures.	
Energy Efficiency	2	Based on the fact that the proposed development will utilize as many energy efficient appliances and light fixtures as possible, the proposed project would not have unusual energy needs and is not expected to have a negative impact on energy consumption.	
SOCIOECONOMIC			
Employment and Income Patterns	2	According to DATA U.S. accessed at https://datausa.io/profile/geo/pinal-county-az In 2019, Pinal County, AZ had a population of 463k	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		people with a median age of 39.9 and a median household income of \$62,057. Between 2018 and 2019 the population of Pinal County, AZ grew from 447,138 to 462,789, a 3.5% increase and its median household income grew from \$59,058 to \$62,057, a 5.08% increase.	
Demographic Character Changes / Displacement	2	The sites located in a residentially and commercially developed area. The proposed development of the site is compatible with the surrounding neighborhood, no demographic character changes or displacement are anticipated with the proposed project.	
COMMUNITY FACILITIES AND SERVICES			
Educational and Cultural Facilities (Access and Capacity)	2	Based on research of the subject properties and surrounding area, and data accessed at NEPA Assist tool on June 12, 2022, there are sufficient educational and cultural facilities located in the vicinity, of which no impacts are anticipated from the proposed development.	
Commercial Facilities (Access and Proximity)	2	Based on research of the subject properties and surrounding area, including the Pinal County Economic Development website, https://pinalazed.com/resources , there are sufficient commercial facilities located in the vicinity, of which no impacts are anticipated from the proposed development.	
Health Care / Social Services (Access and Capacity)	2	Based on research of the subject properties and surrounding area, including the Pinal County Economic Development website, https://pinalazed.com/resources , there are sufficient health care and social service facilities located in the vicinity, of which no impacts are anticipated from the proposed development.	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	2	Based on research of the subject properties and surrounding area, and data accessed at https://www.pinalcountyaz.gov/265/Solid-Waste-Division there are sufficient solid waste/recycling facilities located in the vicinity, of which no impacts are anticipated from the proposed development.	
Waste Water and Sanitary	2	According to available information during Phase I ESA conducted on July 12st, 2021 by Partner, a	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
Sewers (Feasibility and Capacity)		public water system operated by Liberty Utilities (Pinal County Water & Sewer) Corporation serves the subject property vicinity. There are sufficient waste water/sanitary sewer services available, of which no impacts are anticipated from the proposed development. Will serve letter by the City of Casa Grande is attached. Attachment L.	
Water Supply (Feasibility and Capacity)	2	The Arizona Water Company (AWC) - Pinal Valley, a public water utility company, provides water for about 88,019 residents living in the area of Casa Grande, Arizona. Current water use in Casa Grande is around 15,600 acre-feet. An acre-foot is enough water to serve about 4 houses each year. In the 2030 General Plan Update, Casa Grande population along with water demand is projected to double. Groundwater is the primary source for municipal and domestic supply in the county. Proposed project is small enough in magnitude. Therefore, there are sufficient water services available, of which no impacts are anticipated from the proposed development. http://www.azwater.gov/CkWaterSupply/Pinal.aspx Will serve letter by the Arizona Water Company is attached. Attachment M.	
Public Safety - Police, Fire and Emergency Medical	2	Based on the Pinal County Sheriff's website and communication via https://pinalcountyaz.gov/sheriff there are sufficient police, fire, and emergency medical services located in the vicinity, of which no impacts are anticipated from the proposed development.	
Parks, Open Space and Recreation (Access and Capacity)	2	Based on research of the subject properties and surrounding area, and data obtained through Pinal County Parks and Recreation Services at https://www.pinalcountyaz.gov/219/Parks-Recreation there are sufficient parks and recreation facilities located in the vicinity, of which no impacts are anticipated from the proposed development.	
Transportation and Accessibility	2	Based on research of the subject properties and surrounding area, and data obtained through the Pinal County Regional Transportation Commission	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
(Access and Capacity)		data at https://sccrtc.org/ , reasonable accessibility to vicinity public transportation facilities is available in the vicinity, of which no impacts are anticipated from the proposed development.	
NATURAL FEATURES			
Unique Natural Features /Water Resources	2	Based on research of the subject properties and surrounding area, no unique natural features or water resources are located in the vicinity, and no impacts are anticipated from the proposed development.	
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	2	Based on the fact that the subject properties are currently vacant and prepared for future construction and the surrounding area consists of residential and light commercial development, no impact is	
Other Factors 2	2	No other factors have been identified.	

Supporting documentation

[Attachment M Water Will Serve.pdf](#)

[Attachment L Sewer Will Serve.pdf](#)

Additional Studies Performed:

Phase I ESA by Western Technologies Inc. 7/12/2021 for sites located at 401 E. 3rd Street and 202 S. Top and Bottom Street. Phase II and remediation on the 315 W Main Street parcel completed by Western Technologies Inc. in July 2021. Site remediation was conducted and 18-inch soil samples collected from the bottom of the excavation that were below the ADEQ residential soil remediation levels. Therefore, the site is fully clear from any hazardous wastes and clean, and ready for land development.

[Phase II Casa Grande Project Status Report-July 2021\(2\).pdf](#)

[1JJ009 South Top and Bottom Street and West 1st Avenue Phase I ESA\(2\).pdf](#)

[1JJ008 North Drylake and East 3rd Streets Phase I ESA\(2\).pdf](#)

Field Inspection [Optional]: Date and completed

by:

Staci Parisi

4/1/2022 12:00:00 AM

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

EPA Green Book - Current Nonattainment Counties for All Criteria Pollutants
<http://www3.epa.gov/airquality/greenbk/ancl.html> CBRA information *
<http://www.fws.gov/CBRA/Maps/index.html> National Oceanic and Atmospheric
Administration - Ocean and Coastal Resource Management accessed at
<https://coast.noaa.gov/czm/mystate/> U.S. Fish and Wildlife Service (USFWS) *
Arizona Department of Environmental Quality: <https://azdeq.gov/node/3952> *
Environmental Protection Agency Environmental Justice Mapper:
<https://www.epa.gov/ejscreen> * Federal Emergency Management Agency (FEMA):
<https://msc.fema.gov/portal/home> * FFIEC Geocoding Mapping System:
<https://geomap.ffiec.gov/FFIECGeocMap/GeocodeMap1.aspx> * Google Maps:
<https://google.com/maps> * HUD Environmental Review Guidelines:
[https://www.hudexchange.info/resource/3306/environmental-assessment-
factorsguidance/](https://www.hudexchange.info/resource/3306/environmental-assessment-factorsguidance/) * NEPA Assist Mapping Tool: <https://www.epa.gov/nepa/nepassist> *
USDA Natural Resources Conservation Services (NRCS) Web Soil Survey
<http://websoilsurvey.nrcs.usda.gov/app/HomePage.ht> * U.S. Fish & Wildlife Service:
<https://ecos.fws.gov/ipac/> Wetlands Mapper - U.S. Fish and Wildlife Service:
<https://www.fws.gov/wetlands/data/Mapper.html> *
<https://www.pinalcountyaz.gov/airquality/pages/airqualityreport.aspx>

List of Permits Obtained:

Public Outreach [24 CFR 58.43]:

Cumulative Impact Analysis [24 CFR 58.32]:

GEPermit evaluated the cumulative impacts of the proposed development on the surrounding physical, socioeconomic, and cultural environment. There are no current or planned major construction and/or development projects in the immediate project area. It is reasonably foreseeable that continued revitalization and growth in the project vicinity will continue. Considering the demand for affordable housing in the primary market area, and the lack of identified environmental impacts directly related to the proposed development, GEPermit believes that any incremental impacts from the proposed development will only be positive in nature. No additional resources were identified that would be impacted due to the cumulative effects of the projects.

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

The lots could be sold to a private developer for other uses that may not foster development of decent, safe, sanitary and affordable housing in residential areas. Based on the current housing market, it can be assumed the property would become market-rate housing. Development of affordable residential multi-family housing at this site is considered to have a great positive impact on stabilizing the tax base, improving overall area property values and to the primary benefit of providing safe, affordable, decent housing for low- and moderate income households.

No Action Alternative [24 CFR 58.40(e)]

Projects have been proposed with the overall goal of securing resources to construct and provide quality affordable housing in a suitable living environment for low income households. The proposed projects location will provide low income residents with easy access to public transportation, cultural facilities, parks, commercial facilities, healthcare facilities, and schools. If projects remain as is, the goal of providing quality affordable housing for low income will not be met. Under the no action alternative, the current land uses would continue, and no new construction of affordable housing would be constructed; therefore, the no action alternative does not meet the project's purpose and need. If this development did not take place, there would be reduced dust emissions from the proposed construction and no inconvenience from the temporary construction noise or construction trades traffic and site parking. However, these impacts, over the short period of months during construction, are minimal and temporary when compared to the positive impact on affordable housing this project would offer over decades.

Summary of Findings and Conclusions:

In conclusion, according to the Phase I Environmental Site Assessments performed by Western Technologies, Inc. in conformance with the scope and limitations of ASTM Practice E1527-13 of five sites in Pinal County, Arizona, the assessment has revealed no evidence of RECs or environmental issues in connection with the subject properties. Based on the conclusions of this assessment, Partner recommends no further investigation of the subject property at this time. Based on the information contained within and selected mitigation measures outlined within, the proposed project as designed will not result in a significant impact on the quality of the human environment.

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

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

Law, Authority, or Factor	Mitigation Measure or Condition	Comments on Completed Measures	Mitigation Plan	Complete
Historic Preservation	SHPO concurrence is conditioned on further design consultation with SHPO as the project design progresses.	N/A	See Project Mitigation Plan	

Project Mitigation Plan

1. Casa Grande Hotel - This projects consists of affordable residential units to be developed on the same block as the Casa Grande Hotel. This development site is referred to as Site 4 and consists of parcels 507-07-2380 and 507-07-2390. No work on the Casa Grande Hotel will take place as part of CPLC's affordable housing development. New construction will be sensitive to the setting of the historic buildings and surrounding single family neighborhood. The new townhomes will be no more than two stories in height. In addition to vacant parcel (APN 507-07-2400) sited between the future townhomes and the Casa Grande Hotel, side setbacks will be utilized in the design for Site 4 to provide an additional buffer between the townhomes and the historic hotel. In addition, the townhomes will face 1st Avenue. This will allow for rear yard open space along Main Avenue, next to the Casa Grande Hotel. In summary, height, bulk, and massing for site 4 will be concentrated closer to 1st Avenue and Sacaton Street with buffers between the old and new construction.

2. Shonessy House - Site 5 is located on the same block as the Shonessy House. This site, which is adjacent to the National Register-listed property, will contain no new buildings - only surface parking and green space. No work on Shonessy House will take place as part of CPLC's affordable housing development.

3. Disturbances during construction - CPLC will monitor construction activities closely to ensure no impacts to historic resources occur.

4. Discovery of Unknown Resources - CPLC shall continuously comply with the following requirement: In the event that unanticipated cultural or tribal cultural resources are encountered during the course of grading or construction, the project operator/contractor shall cease any ground disturbing activities within 50 feet of the find. Cultural and/or tribal cultural resources may include prehistoric archaeological materials such as flaked and ground stone tools and debris, shell, bone, ceramics, and fire-affected rock, as well as historic materials such as glass, metal, wood, brick, or structural remnants. A qualified archaeologist shall evaluate the resource and recommend treatment measures, as appropriate.

5. CPLC shall consult with the State Historic Preservation Office during the plan development process.

Supporting documentation on completed measures

APPENDIX A: Related Federal Laws and Authorities

Airport Hazards

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

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

✓ No

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

Yes

Screen Summary

Compliance Determination

There are no military airports within 15,000 feet of the subject property or civil airport runways within 2,500 feet of the subject property. It is also not located within the airport's clear zone or noise contours. The proposed undertaking is in compliance with HUD's Airport Hazard regulations and no mitigation is warranted. The site is located 6.41 mi from the Casa Grande Municipal Airport, 13 mi from the Eloy Municipal Airport, 14.52 mi from the Mariposa Municipal airport, and 23.51 mi from Coolidge Municipal airport. Determination: The project is in compliance with Airport Hazards requirements. Source (s) / Documentation: Federal Aviation Administration (FAA) <https://oeaaa.faa.gov/oeaaa/external/searchAction.jsp?action=showCircleSearchAirportsForm> Environmental Protection Agency (EPA) <http://nepassisttool.epa.gov/nepassist/entry.aspx>

Supporting documentation

[315 W Main.pdf](#)

[209 W Main.pdf](#)

[202 S Top and Bottom.pdf](#)

[107 W Main.pdf](#)
[401 E 3rd.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Coastal Barrier Resources

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

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.

Compliance Determination

Project lots are located in HUD Region IX (CA, AZ, NV, HI, Guam) have no coastal barrier resources. The subject properties are not located within a Coastal Barrier Resource Area. The project is in compliance with the Coastal Barrier Resources Act and related laws and regulations. Source (s) / Documentation: Coastal Barrier Resource Area <http://www.fws.gov/CBRA/Maps/index.html>

Supporting documentation

[Coastal Barrier Resource Map.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Flood Insurance

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

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

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

✓ Yes

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

[315 W Main\(2\).pdf](#)

[209 W Main\(2\).pdf](#)

[202 S Top and Bottom\(2\).pdf](#)

[107 W Main\(2\).pdf](#)

[401 E 3rd\(6\).pdf](#)

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

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

✓ No

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

Yes

4. While flood insurance is not mandatory for this project, HUD strongly recommends

that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). Will flood insurance be required as a mitigation measure or condition?

Yes

✓ No

Screen Summary

Compliance Determination

The subject property is located in Shaded Zone X, FEMA Map #04021C1170E effective December 4, 2007. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with flood insurance requirements. Source (s) / Documentation: FEMA Flood Map Service Center <https://msc.fema.gov/portal/home> Federal Emergency Management Agency (FEMA) <https://msc.fema.gov/portal/home>

Supporting documentation

[315 W Main\(3\).pdf](#)

[209 W Main\(3\).pdf](#)

[202 S Top and Bottom\(3\).pdf](#)

[107 W Main\(3\).pdf](#)

[401 E 3rd\(5\).pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Air Quality

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

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

Yes

No

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?

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

Yes, project's management district or county is in non-attainment or maintenance status for the following criteria pollutants (check all that apply):

Carbon Monoxide

Lead

Nitrogen dioxide

Sulfur dioxide

- ✓ Ozone
- Particulate Matter, <2.5 microns
- ✓ Particulate Matter, <10 microns

3. What are the *de minimis* emissions levels (40 CFR 93.153) or screening levels for the non-attainment or maintenance level pollutants indicated above

Ozone		ppb (parts per million)
Particulate Matter, <10 microns	70.00	µg/m ³ (micrograms per cubic meter of air)

Provide your source used to determine levels here:

The Project's air quality management district Pinal County is in Pm10 and Ozone nonattainment status. Project area is located in a Non-Attainment Area for PM 10 and 8-hour ozone. Projects activities involving ground disturbance of greater than 1/10 acre will require a dust control permit. Other than brief period of construction, projects will have no negative impact on air quality issues or community pollution levels. Dust control measures and a Dust Permit Application are required under the Pinal County regulations. Since the result is little to no impact on air quality, the project includes no activities that would require further evaluation under the Clean Air Act.

4. Determine the estimated emissions levels of your project. 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.

Enter the estimate emission levels:

Ozone		ppb (parts per million)
Particulate Matter, <10 microns		µg/m ³ (micrograms per cubic meter of air)

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

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

Screen Summary

Compliance Determination

The Project's air quality management district Pinal County is in Pm10 and Ozone nonattainment status. Project area is located in a Non-Attainment Area for PM 10 and 8-hour ozone. Projects activities involving ground disturbance of greater than 1/10 acre will require a dust control permit. Other than brief period of construction, projects will have no negative impact on air quality issues or community pollution levels. Dust control measures and a Dust Permit Application are required under the Pinal County regulations. Since the result is little to no impact on air quality, the project includes no activities that would require further evaluation under the Clean Air Act. The Project is in compliance with the Clean Air Act. Source (s) / Documentation: Pinal County Dust Information
<https://www.pinalcountyaz.gov/AirQuality/Dust/Pages/Home.aspx>
<https://www.pinalcountyaz.gov/airquality/pages/airqualityreport.aspx>

Supporting documentation

[Air Quality Attainment Zones.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Coastal Zone Management Act

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

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.

Screen Summary

Compliance Determination

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.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Contamination and Toxic Substances

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

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

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

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

- No

Explain:

The Tier 1 Primary Screening, conducted as part of the Phase I Site Assessment, indicated that there were no findings of potential hazards associated with contamination and toxic substances. According to the database, there were no evaluations, violations, or enforcement actions filed, nor citations, inspections, or enforcement actions documented in the agency file. Out of the 5 lots included in the project, 315 W Main Street parcel had a Phase II and remediation completed by Western Technologies Inc. in July 2021. Site remediation was conducted and 18-inch soil samples collected from the bottom of the excavation that were below the ADEQ residential soil remediation levels. Therefore, the site is fully clear from any hazardous wastes and clean, and ready for land development.

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

Yes

Screen Summary

Compliance Determination

Site contamination was evaluated as follows: ASTM Phase I ESA, ASTM Phase II ESA. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. The project is in compliance with contamination and toxic substances requirements. The Tier 1 Primary Screening, conducted as part of the Phase I Site Assessment, indicated that there were no findings of potential hazards associated with contamination and toxic substances. According to the database, there were no evaluations, violations, or enforcement actions filed, nor citations, inspections, or enforcement actions documented in the agency file. Out of the 5 lots included in the project, 315 W Main Street parcel had a Phase II and remediation completed by Western Technologies Inc. in July 2021. Site remediation was conducted and 18-inch soil samples collected from the bottom of the excavation that were below the ADEQ residential soil remediation levels. Therefore, the site is fully clear from any hazardous wastes and clean, and ready for land development.

Supporting documentation

[Phase II Casa Grande Project Status Report-July 2021\(1\).pdf](#)

[315 W Main\(5\).pdf](#)

[209 W Main\(5\).pdf](#)

[202 S Top and Bottom\(5\).pdf](#)

[107 W Main\(5\).pdf](#)

[1JJ009 South Top and Bottom Street and West 1st Avenue Phase I ESA\(1\).pdf](#)

[1JJ008 North Drylake and East 3rd Streets Phase I ESA.pdf](#)

[401 E 3rd\(1\).pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Endangered Species

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

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

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

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

Explain your determination:

Based on the desktop review of the endangered species mapping, the projects will have "no effect" or "are not likely to adversely affect" any federally protected (listed or proposed) Threatened or Endangered Species (i.e., plants or animals, fish, or invertebrates), nor adversely modify designated critical habitats. The closest species is the Southwester Willow Flycatcher, *Empidonax trallii extimus*. It has been concluded that there is no significant impact on the environment and its surroundings. The projects will have No Effect on the listed species, which are in compliance with the Endangered Species Act. Source (s) / Documentation: <https://ecos.fws.gov/ecp0/reports/specieslisted-by-statereport?state=AZ&status=listed>
https://fws.maps.arcgis.com/home/webmap/viewer.html?webmap=9d8de5e265ad4fe09893cf75_b8dbfb77 U.S. Fish & Wildlife Service <https://ecos.fws.gov/ipac/>

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

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

Screen Summary

Compliance Determination

Based on the desktop review of the endangered species mapping, the projects will have "no effect" or "are not likely to adversely affect" any federally protected (listed or proposed) Threatened or Endangered Species (i.e., plants or animals, fish, or invertebrates), nor adversely modify designated critical habitats. The closest species is the Southwester Willow Flycatcher, *Empidonax trallii extimus*. It has been concluded that there is no significant impact on the environment and its surroundings. The projects will have No Effect on the listed species, which are in compliance with the Endangered Species Act. Source (s) / Documentation:
<https://ecos.fws.gov/ecp0/reports/specieslisted-by-statereport?state=AZ&status=listed>
<https://fws.maps.arcgis.com/home/webmap/viewer.html?webmap=9d8de5e265ad4fe09893cf75b8dbfb77> U.S. Fish & Wildlife Service <https://ecos.fws.gov/ipac/>

Supporting documentation

[315 W Main\(1\).pdf](#)

[209 W Main\(1\).pdf](#)

[202 S Top and Bottom\(1\).pdf](#)

[107 W Main\(1\).pdf](#)

[401 E Third.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Explosive and Flammable Hazards

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

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

No

Yes

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

No

Yes

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

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

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

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

No

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

Yes

Screen Summary

Compliance Determination

The Phase I ESA (page 5) finds that no evidence of current or former ASTs or USTs were observed during the site visit (06/12/2021) and assessment, nor were any found within one mile of the project location. There is no evidence of hazardous materials or facilities within the projects. Project activities involve revitalization of community including infill housing development on vacant lots. Out of the 5 lots, 315 W. Main Street parcel had a Phase II and remediation completed by Western Technologies Inc. in July 2021. Site remediation was conducted and 18-inch soil samples collected from the bottom of the excavation that were below the ADEQ residential soil remediation levels. Therefore, the site is fully clear from any hazardous wastes and clean, and ready for land development. The Project is in compliance with explosive and flammable hazard requirements. Source (s) / Documentation: Phase I ESA, July 12, 2021 by Western Technologies Inc.

Supporting documentation

[Phase II Casa Grande Project Status Report-July 2021.pdf](#)

[1JJ009 South Top and Bottom Street and West 1st Avenue Phase I ESA\(2\).pdf](#)

[1JJ008 North Drylake and East 3rd Streets Phase I ESA\(1\).pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Farmlands Protection

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

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

Yes

No

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

According to the USDA's Natural Resource Conservation Service Soil Survey map that focuses on the soil depictions on Pinal County, AZ., the site location falls in residential zone areas, and soil that is classified as farmland of unique importance. Even though the current designation of the land is "farmland of unique importance", based on the HUD guidelines a finding of compliance with the requirements of the Farmland Protection Policy Act of 1981 (7 U.S.C. 4201 et seq.) must be made for assisted new construction activities, the acquisition of undeveloped land, and conversion projects. Since the Project is located on a land already in or committed to urban development (7 CFR 658.2(a)), project is in compliance with the Farmland Protection Policy Act of 1981. USDA Natural Resources Conservation Services (NRCS) Web Soil Survey <https://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm>

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

Screen Summary

Compliance Determination

According to the USDA's Natural Resource Conservation Service Soil Survey map that focuses on the soil depictions on Pinal County, AZ., the site location falls in residential zone areas, and soil that is classified as farmland of unique importance. Even though

the current designation of the land is "farmland of unique importance", based on the HUD guidelines a finding of compliance with the requirements of the Farmland Protection Policy Act of 1981 (7 U.S.C. 4201 et seq.) must be made for assisted new construction activities, the acquisition of undeveloped land, and conversion projects. Since the Project is located on a land already in or committed to urban development (7 CFR 658.2(a)), project is in compliance with the Farmland Protection Policy Act of 1981. USDA Natural Resources Conservation Services (NRCS) Web Soil Survey <https://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm>

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Floodplain Management

General Requirements	Legislation	Regulation
Executive Order 11988, Floodplain Management, requires federal activities to avoid impacts to floodplains and to avoid direct and indirect support of floodplain development to the extent practicable.	Executive Order 11988	24 CFR 55

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

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

None of the above

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

- [315 W Main\(2\).pdf](#)
- [209 W Main\(2\).pdf](#)
- [202 S Top and Bottom\(2\).pdf](#)
- [107 W Main\(2\).pdf](#)
- [401 E 3rd\(6\).pdf](#)

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

Does your project occur in a floodplain?

No

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

Yes

Screen Summary

Compliance Determination

Project lots locations are not within a 100 year flood area, as seen from the FEMA Flood Map. Property is in Zone X, outside the 100-year floodplain. There are no Special Flood Hazard Areas in the area. The Project is in compliance with Executive Order 11988. Source (s) / Documentation: FEMA National Flood Hazard ArcGIS Mapper <http://arcg.is/2lcM06t> Federal Emergency Management Agency (FEMA) <https://msc.fema.gov/portal/home>

Supporting documentation

[315 W Main\(4\).pdf](#)

[209 W Main\(4\).pdf](#)

[202 S Top and Bottom\(4\).pdf](#)

[107 W Main\(4\).pdf](#)

[401 E 3rd\(5\).pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Historic Preservation

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

Threshold

Is Section 106 review required for your project?

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

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

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

Step 1 – Initiate Consultation

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

- ✓ State Historic Preservation Offer (SHPO) Completed
- ✓ Indian Tribes, including Tribal Historic Preservation Officers (THPOs) or Native Hawaiian Organizations (NHOs)

✓ Hopi Cultural Preservation Office	Completed
✓ White Mountain Apache Tribe	Completed

Other Consulting Parties

Describe the process of selecting consulting parties and initiating consultation here:

An official Section 106 SHPO and THPO consultation has been initiated by CPLC on July 20, 2022. A concurrence of No Adverse Effects, conditioned on further consultation with SHPO as design progresses, was received from Arizona SHPO on September 23, 2022.. Total 8 tribes were also consulted. Several of them submitted their concurrence. The projects will be in compliance with the required consultation process. Source (s) / Documentation: Received SHPO and tribal concurrence letters to date.

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

Was the Section 106 Lender Delegation Memo used for Section 106 consultation?

- Yes
- No

Step 2 – Identify and Evaluate Historic Properties

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

401 E 3rd St., Casa Grande, AZ 85112; 315 W. Main Avenue, Casa Grande, AZ 85112; 209 W. Main Avenue, Casa Grande, AZ 85112; 202 S. Top and Bottom Road, Casa Grande, AZ 85112; 107 W. Main Ave, Casa Grande, AZ 85112

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

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

below.

Address / Location / District	National Register Status	SHPO Concurrence	Sensitive Information
Casa Grande Hotel (507-07-2410)	Listed	Yes	✓ Not Sensitive
Shonessy House (APN 507-07-2420)	Listed	Yes	✓ Not Sensitive

Additional Notes:

There are two historic buildings that share city blocks with Sites 4 and 5 of the proposed affordable housing project. These include the Casa Grande Hotel (APN 507-07-2410) and the Shonessy House (APN 507-07-2420). These buildings are listed on both the National Register of Historic Places and the local historic register. The City of Casa Grande owns both buildings/parcels, and while they have a vision to rehabilitate and give new life to these historic buildings, those plans are still under development and are not included in the scope of work for this project. As such, the proposed affordable housing project will have no direct effects on the Casa Grande Hotel or the Shonessy House.

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

✓ Yes

Document and upload surveys and report(s) below.

For Archeological surveys, refer to HP Fact Sheet #6, Guidance on Archeological Investigations in HUD Projects.

Additional Notes:

There are two historic buildings that share city blocks with Sites 4 and 5 of the proposed affordable housing project. These include the Casa Grande Hotel (APN 507-07-2410) and the Shonessy House (APN 507-07-2420). These buildings are listed on both the National Register of Historic Places and the local historic register. The City of Casa Grande owns both buildings/parcels, and while they have a vision to rehabilitate and give new life to these historic buildings, those plans are still under development and are not included in the scope of work for this project. As such, the proposed affordable housing project will have no direct effects on the Casa Grande Hotel or the Shonessy House.

No

Step 3 –Assess Effects of the Project on Historic Properties

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

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

No Historic Properties Affected

✓ No Adverse Effect

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

Document reason for finding:

There are two historic buildings that share city blocks with Sites 4 and 5 of the proposed affordable housing project. These include the Casa Grande Hotel (APN 507-07-2410) and the Shonessy House (APN 507-07-2420). These buildings are listed on both the National Register of Historic Places and the local historic register. The City of Casa Grande owns both buildings/parcels, and while they have a vision to rehabilitate and give new life to these historic buildings, those plans are still under development and are not included in the scope of work for this project. As such, the proposed affordable housing project will have no direct effects on the Casa Grande Hotel or the Shonessy House.

Does the No Adverse Effect finding contain conditions?

Yes (check all that apply)
Avoidance

Modification of project

Other

Describe conditions here:

SHPO concurrence is conditioned on further design consultation with SHPO as the project design progresses.

No

Adverse Effect

Screen Summary

Compliance Determination

Based on Section 106 consultation the project will have No Adverse Effect on historic properties. Conditions: null. Upon satisfactory implementation of the conditions, which should be monitored, the project is in compliance with Section 106. An official Section 106 SHPO and THPO consultation has been initiated by CPLC on July 20, 2022. A concurrence of No Adverse Effects, conditioned on further consultation with SHPO as design progresses, was received from Arizona SHPO on September 23, 2022. Total 8 tribes were also consulted. Several of them submitted their concurrence. The projects will be in compliance with the required consultation process. Source (s) / Documentation: Received SHPO and tribal concurrence letters to date.

Supporting documentation

[APE.PNG](#)

[Map of Historic Properties.PNG](#)

[2022-0871 \(165714\) Casa Grande 5 Lots SHPO concurrence letter.pdf](#)

[Response SHPO 2022 0871 Five Parcel Casa Grande.pdf](#)

[White Mountain Apache response.pdf](#)

[HOPI Tribe response.pdf](#)

Are formal compliance steps or mitigation required?

CPLC-Rental-Development-
Casa-Grande

Casa Grande, AZ

900000010287029

Yes

✓ No

Noise Abatement and Control

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

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

- New construction for residential use

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.

Rehabilitation of an existing residential property

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

An interstate land sales registration

Any timely emergency assistance under disaster assistance provision or appropriations which are provided to save lives, protect property, protect public health and safety, remove debris and wreckage, or assistance that has the effect of restoring facilities substantially as they existed prior to the disaster

None of the above

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

Indicate the findings of the Preliminary Screening below:

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

- ✓ Noise generators were found within the threshold distances.

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

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

Indicate noise level here: 50

Based on the response, the review is in compliance with this section. Document and upload noise analysis, including noise level and data used to complete the analysis below.

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))

Unacceptable: (Above 75 decibels)

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

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

Indicate noise level here: 50

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

Screen Summary

Compliance Determination

A Noise Assessment was conducted. The noise level was acceptable: 50.0 db. See noise analysis. The project is in compliance with HUD's Noise regulation. The nearest railroad is within 50 ft. of the site location. The nearest airport, the Casa Grande Municipal Airport, is more than approximately 6.41 miles from the project sites,

further than the 15,000 ft. Based on the HUD ATEC noise calculation, DNL is not expected to be above 70.

Supporting documentation

[Noise generator map.PNG](#)

[DNL Calculator - HUD Exchange.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Sole Source Aquifers

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

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

Yes

✓ No

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

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

✓ No

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

Yes

Screen Summary

Compliance Determination

The Project is not located within any Sole Source Aquifer Designation Zones protected by the Safe Drinking Water Act. The project is in compliance with HUD's Sole Source Aquifer regulations. Source (s) / Documentation: Environmental Protection Agency

(EPA) NEPAAssistmap. <https://nepassisttool.epa.gov/nepassist/analysis.aspx>
<https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=9ebb047ba3ec41ada1877155fe31356b>

Supporting documentation

[Arizona-Sole-Source-Acquifer-Map.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Wetlands Protection

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

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

No

✓ Yes

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. Document and upload a map or any other relevant documentation below which explains your determination

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

Screen Summary

Compliance Determination

Based on information from the U.S. Fish & Wildlife Service, projects are within 0.5 mi of NWI designated wetland areas. The proposed project will not impact on- or off-site wetlands. No surface impoundments, wetlands, natural catch basins, ponds or lagoon are located on the subject property. No potential Waters of the U.S. or wetlands are present in the project area. Based on the Project location, a Clean Water Act permit or Section 401 certification is not required/triggered. The Project is in compliance with Executive Order 11990. Source (s) / Documentation: Environmental Protection Agency (EPA) NEPAassist <https://www.fws.gov/wetlands/data/Mapper.html> See Attached Document Section. <https://www.epa.gov/nepa/nepassist>

Supporting documentation

[Wetlands map.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Wild and Scenic Rivers Act

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

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

No

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

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

Screen Summary

Compliance Determination

There are no Wild and Scenic Rivers in the vicinity of the subject property. The Project is in compliance with the Wild and Scenic Rivers Act. Source (s) / Documentation: National Wild & Scenic Rivers <https://www.rivers.gov/map.php>

Supporting documentation

[Wild and scenic rivers map.PNG](#)

Are formal compliance steps or mitigation required?

Yes

No

Environmental Justice

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

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

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

Yes

No

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

Screen Summary

Compliance Determination

The Project provides affordable housing for low-income families. The project will not result in disproportionately high or adverse human health or environmental impact on a minority population, low-income population, or Indian tribe because there are no such health risks present. No adverse environmental impacts were identified in the project's total environmental review. Projects are in compliance with Executive Order 12898. Source (s) / Documentation: Environmental Justice Map Environmental Protection Agency <https://www.epa.gov/ejscreen>

Supporting documentation

[Environmental Justice Map.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

