



U.S. Department of Housing and Urban  
Development  
451 Seventh Street, SW  
Washington, DC 20410  
[www.hud.gov](http://www.hud.gov)  
[espanol.hud.gov](http://espanol.hud.gov)

**Tiered Environment Review  
for Activity/Project that is  
Categorically Excluded Subject to Section 58.5  
Pursuant to 24 CFR 58.35(a)**

**Project Information**

**Project Name:** CDBG-DR-Basement-Backup-Program-Phase-I

**HEROS  
Number:** 900000010360230

**Responsible Entity  
(RE):** DETROIT, PLANNING AND DEVELOPMENT DEPARTMENT  
DETROIT MI, 48226

**State / Local  
Identifier:** Detroit, Michigan

**RE Preparer:** Kim Siegel

**Certifying  
Officer:** Julie Schneider, Director

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

**Point of Contact:**

**Consultant (if  
applicable):**

**Point of Contact:**

**Project  
Location:** Detroit, MI

**Additional Location Information:**  
Throughout the City of Detroit

**Direct Comments  
to:** Kim Siegel, Environmental Compliance Specialist, City of Detroit  
E-mail: [Kim.Siegel@detroitmi.gov](mailto:Kim.Siegel@detroitmi.gov)

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

The CDBG Disaster Relief Program Funds will be used to support housing recovery and protection efforts to homes impacted by the 2021 flood. In partnership with City of Detroit Water and Sewage Department (DWSD), the Basement Backup Protection Program will repair or replace sewer services lines, install backwater valves, and provide emergency housing needs. The proposed total units that will receive recovery and protection efforts are between 1,500-2,000. Tier 2 site specific reviews will be completed for those laws and authorities not addressed in the Tier 1 broad review for each address under this program when addresses become known. This review is for \$43,211,450.00 in CDBG-DR. This review is valid for up to five years.

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

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

**Length of time covered by this review:** 5 Years

**Maximum number of dwelling units or lots addressed by this tiered review:**  
2000

**Level of Environmental Review Determination:**

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

**Determination:**

	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:**

[Signature Page - CDBG-DR Basement Backup.pdf](#)

**7015.15 certified by Certifying Officer on:**

**7015.16 certified by Authorizing Officer on:**

**Funding Information**

Grant Number	HUD Program	Program Name
B21MF260002	Community Planning and Development (CPD)	Community Development Block Grants (Disaster Recovery Assistance)

**Estimated Total HUD Funded Amount:** \$43,211,450.00

**Estimated Total Project Cost [24 CFR 58.2 (a) (5)]:** \$43,211,450.00

**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	Was compliance achieved at the broad level of review?	Describe here compliance determinations made at the broad level and source documentation.
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 &amp; § 58.6</b>		
Airport Hazards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	The Coleman A. Young International Airport is located within the corporate limits of the City of Detroit. However, there are no residential structures located within the Runway Clear Zone, and the project will not provide assistance, subsidy or insurance for any other covered activity within a Runway Clear Zone (Attachment A).
Coastal Barrier Resources Act	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	There are no coastal barriers within the City of Detroit. Therefore, this project is not expected to affect any resource within the Coastal Barrier Resource System. Consultation with the U.S. Fish and Wildlife Service is not required for this project (Attachment B).
Flood Insurance	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 &amp; § 58.5</b>		
Air Quality	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	According to the attached Michigan Department of the Environment, Great Lakes and Energy (EGLE) air quality attainment map, revised July 2023, a corridor that runs along I-75 extending east to the shoreline border is

		<p>designated nonattainment for Sulfur Dioxide (SO<sub>2</sub>) and all of Wayne County is in an attainment/maintenance area for ozone. Additionally, Wayne County is in the Environmental Protection Agencies (EPA) Zone 3 for radon. However, the project scope does not include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities. The scope involves minor rehabilitation to an existing structure. Therefore, the project is in compliance with the Clean Air Act without further evaluation (Attachment C).</p>
<p>Coastal Zone Management Act</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>This project may provide financial assistance to address existing residential structures located within the Coastal Zone Management Area. The City of Detroit submitted this project to the Michigan Department of the Environment, Great Lakes and Energy (EGLE) for review and evaluation. In a letter dated September 23, 2014, the Water Resources Division of EGLE anticipates that the proposed project will result in no adverse effect on coastal resources, that the City obtain/issue all required permits. As such, the EGLE determined that the project is consistent with the State Coastal Management Plan (Attachment D).</p>
<p>Contamination and Toxic Substances</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	
<p>Endangered Species Act</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>This project will provide financial assistance existing residential structures in the highly urbanized area. This project does not involve new construction or expansion of an existing structure which could disturb natural vegetation or critical habitat. Therefore, this project will have no effect on a listed or proposed endangered or threatened species. Consultation with the U.S. Fish and Wildlife Service or the State of Michigan Department of</p>



		Natural Resources is not required for this project (Attachment E).
Explosive and Flammable Hazards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	This project provides financial assistance to address existing residential structures within the City of Detroit. This project does not increase residential densities, convert structures to residential use, or make any vacant structure suitable for habitation. Therefore, this project does not meet the definition of a "HUD assisted project," and the project is not subject to the regulatory requirements identified above (Attachment F).
Farmlands Protection	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	The City of Detroit is located within an urbanized area as defined by the U.S. Census Bureau. Therefore, this project will not affect any prime or unique farmland, and this project is not subject to the statutory or regulatory requirements identified above, per 7 CFR 658.2(a) (Attachment G).
Floodplain Management	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Historic Preservation	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	The City of Detroit operates under a Programmatic Agreement (PA) between the Michigan State Historic Preservation Office and the City of Detroit, Michigan..., " dated December 21, 2022. This PA includes a list of Programmatic Exclusions that exclude a project from Section 106 based on the scope of a project. Based on the scope of this project, this project falls under the Programmatic Exclusions included in Appendix C of the PA, including; A. Site Improvements 2 & 3: 2) Repaired/replacement of existing curbs and sidewalks with identical materials within existing dimensions; 3) Repair/replacement of water, gas, storm and/or sewer lines if it occurs within the dimensions of the original trench and permanent impacts upon surface treatments or landscape features which contribute to the historic or architectural significance of the resource are avoided. B. Interior Rehabilitation 1, 7 and 9: 1) All

		plumbing rehab/replacement - including pipes and fixtures 7) Repairs of or pouring of concrete cellar floor 9) Repair or replacement of concrete basement floors and interior basement walls C Exterior Rehabilitation 8 8) Repair, replace, or install new sidewalks or driveways that match the existing sidewalk or driveway in materials and dimensions. Therefore, this project is in compliance with the NHPA regulations (Attachment H).
Noise Abatement and Control	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	The project includes minor rehabilitation to existing residential properties in the City of Detroit. The project scope falls under 24 CFR Part 58.35(a)(3)(1); Rehabilitation of buildings and improvements when the following conditions are met: (i) In the case of a building for residential use (with one to four units), the density is not increased beyond four units, and the land use is not changed. Therefore, further evaluation of noise is not required (Attachment I).
Sole Source Aquifers	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	There are no sole source aquifers, as designated by the U.S. Environmental Protection Agency (U.S. EPA), within Southeast Michigan. Therefore, this project will not adversely affect any sole source aquifer (Attachment J).
Wetlands Protection	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	This project will provide financial assistance to address existing residential structures. This project does not provide financial assistance for new construction or expansion of an existing structure which may fill or otherwise degrade a wetland. Therefore, this project does not meet the applicability standards articulated in Sections 1(a) or 2(a) of Executive Order 11990. This project is not required to follow the 8 Step Decision Making Process outlined in 24 CFR 55.20 (Attachment K).
Wild and Scenic Rivers Act	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	There are no designated or proposed wild and scenic rivers within or near Southeast Michigan. Therefore, this

		project will not affect the water or related land resources of a designated or proposed wild and scenic river. Consultation with a Federal agency is not required for this project (Attachment L).
<b>ENVIRONMENTAL JUSTICE</b>		
Environmental Justice	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

**Supporting documentation**

- [Attachment C - Revised Air Quality Map 2023.pdf](#)
- [Attachment C - EPA Radon Map.pdf](#)
- [Attachment B - Coastal Barriers.pdf](#)
- [Attachment D - Coastal Zone Map.pdf](#)
- [Attachment E - Endangered Species Worksheet.pdf](#)
- [Attachment G - Farmland Worksheet.pdf](#)
- [Basement Backup Unanticipated Discoveries Plan.docx](#)
- [Attachment H - PA Programmatic Exclusions Appendix C.pdf](#)
- [Attachment J - Sole Source Aquifer.pdf](#)
- [Attachment K - Wetlands.pdf](#)
- [Attachment L - Wild and Scenic Rivers.pdf](#)
- [Attachment A - RCZ.pdf](#)
- [Attachment F - Explosives Worksheet.pdf](#)
- [Attachment I - Noise.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.

<b>1</b>	Flood Insurance
	All site-specific reviews must include a FEMA FIRM map with the project site clearly marked. If the project structures are located in a FEMA Special Flood Hazard Area (SFHA), the project must provide proof of flood insurance. This may be either 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.
<b>2</b>	Contamination and Toxic Substances

	<p>Site-specific reviews must include a review of previous uses of the site and other evidence of contamination on or near the site to assure the proposed occupants are not impacted by any of these hazards. For each proposed site, the environmental review preparer will provide a report of nearby toxic sites and releases using EPA's Envirofacts, NEPAAssist, or a similar resource provided by the tribal environmental or planning agency/department. Site-specific environmental review preparers will also provide documentation on previous uses of the site, to the extent possible. HUD will use the information provided to determine whether there is evidence of toxics or contamination. These steps may involve mitigation, further evaluation, or rejection of the project.</p>
<b>3</b>	<p>Floodplain Management</p> <p>Site-specific environmental review preparer will provide a Flood Insurance Rate Map (FIRM) if available, with the project site clearly marked for each proposed project site. If the project site is located in a floodplain, the property owner will be required to provide proof of flood insurance coverage or be rejected from the program.</p>
<b>4</b>	<p>Environmental Justice</p> <p>Site-specific environmental reviews must consider whether the action will create environmental injustice for the residents. For each proposed site, the City of Detroit Housing &amp; Revitalization Department will provide an Environmental Justice Screening (EJScreen) map from the Environmental Protection Agency (EPA) to determine if there will be an impact to environmental justice.</p>

**Supporting documentation**

[Basement Backup Tier II.pdf](#)

**APPENDIX A: Site Specific Reviews**



**U.S. Department of Housing and Urban  
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Washington, DC 20410  
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**Tiered Environment Review  
for Activity/Project that is  
Categorically Excluded Subject to Section 58.5  
Pursuant to 24 CFR 58.35(a)**

**Project Information**

**Project Name:** CDBG-DR-Basement-Backup-Program-Phase-I

**HEROS Number:** 900000010360230

**State / Local Identifier:** Detroit, Michigan

**Project Location:** Detroit, MI

**Additional Location Information:**

Throughout the City of Detroit

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

The CDBG Disaster Relief Program Funds will be used to support housing recovery and protection efforts to homes impacted by the 2021 flood. In partnership with City of Detroit Water and Sewage Department (DWSD), the Basement Backup Protection Program will repair or replace sewer services lines, install backwater valves, and provide emergency housing needs. The proposed total units that will receive recovery and protection efforts are between 1,500-2,000. Tier 2 site specific reviews will be completed for those laws and authorities not addressed in the Tier 1 broad review for each address under this program when addresses become known. This review is for \$43,211,450.00 in CDBG-DR. This review is valid for up to five years.

**Level of Environment Review Determination:**

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

**Funding Information**

Grant Number	HUD Program	Program Name	Funding Amount
B21MF260002	Community Planning and Development (CPD)	Community Development Block Grants (Disaster Recovery Assistance)	

**Estimated Total HUD Funded Amount:** \$43,211,450.00

CDBG-DR-Basement-Backup-  
Program-Phase-I

Detroit, MI

900000010360230

**Estimated Total Project Cost [24 CFR 58.2 (a) (5)]:** \$43,211,450.00

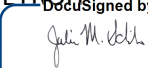
**Mitigation Measures and Conditions [40 CFR 1505.2(c)]:** Consult the completed environmental review record for information on the mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the 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.

**Determination:**

- 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.

DocuSigned by:  
  
**Preparer Signature:** \_\_\_\_\_ **Date:** 11/20/2023

**Name / Title/ Organization:** Kim Siegel / / DETROIT

DocuSigned by:  
  
**Responsible Entity Agency Official Signature:** \_\_\_\_\_ **Date:** 11/20/2023

**Name/ Title:** Julie Schneider, Director, Housing and Revitalization Department

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



# Runway Clear Zone

Coleman A Young International Airport



Google Earth

4000 ft

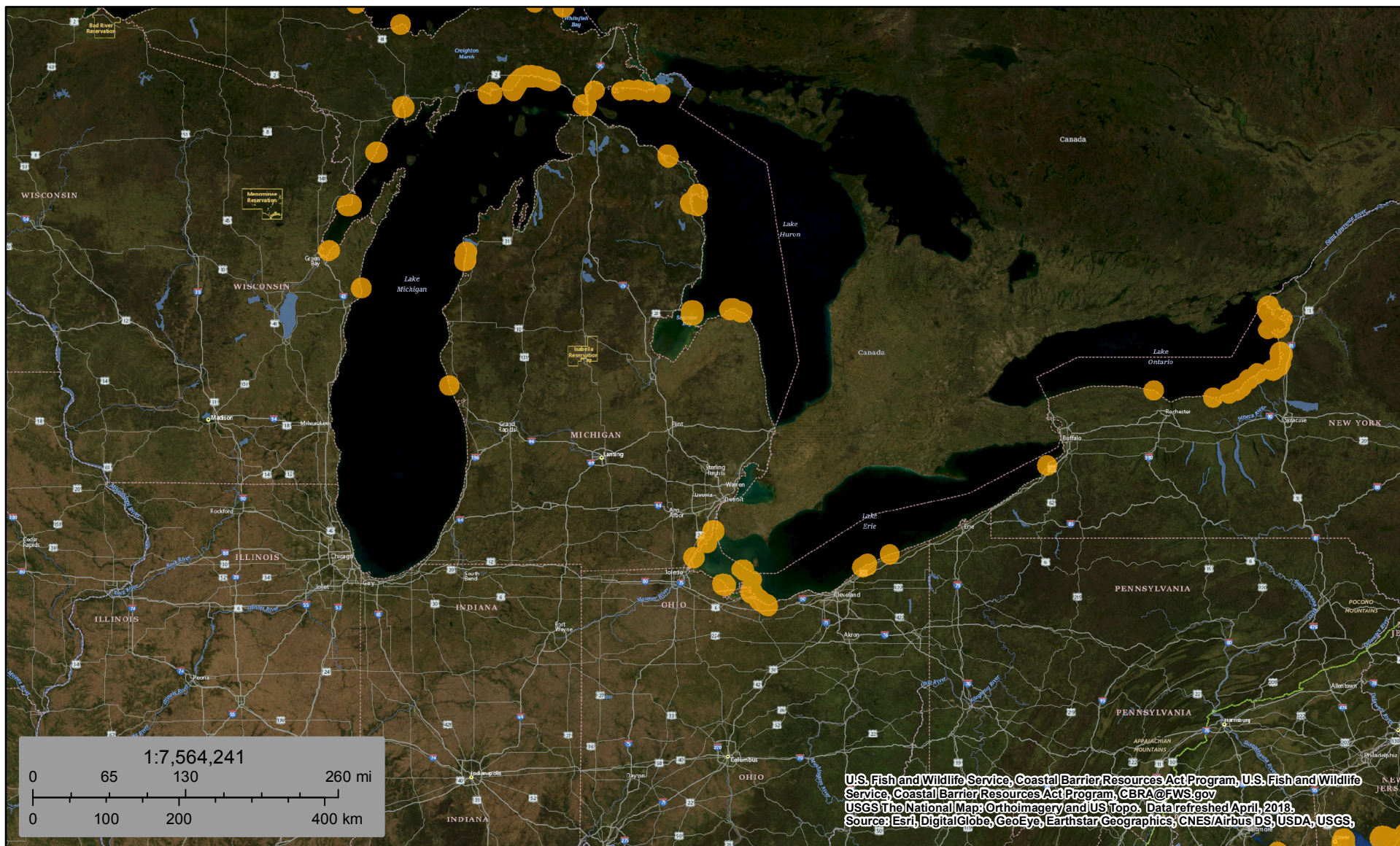






# U.S. Fish and Wildlife Service Coastal Barrier Resources System

# CBRS



February 1, 2019

 CBRS Units

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

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

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





## WASTE

Solid Waste
Hazardous Waste
Transporters
Radiological Protection
Michigan Indoor Radon Program
Low-Level Radioactive Waste
Radioactive Materials
Radiological Monitoring & Reporting
Radiological Emergency Preparedness
Waste Compliance & Enforcement

[DEQ](#) / [WASTE](#) / [RADIOLOGICAL PROTECTION](#) / [MICHIGAN INDOOR RADON PROGRAM](#)

## Your County's Radon Levels

Contact: 800-723-6642 or [radon@michigan.gov](mailto:radon@michigan.gov)

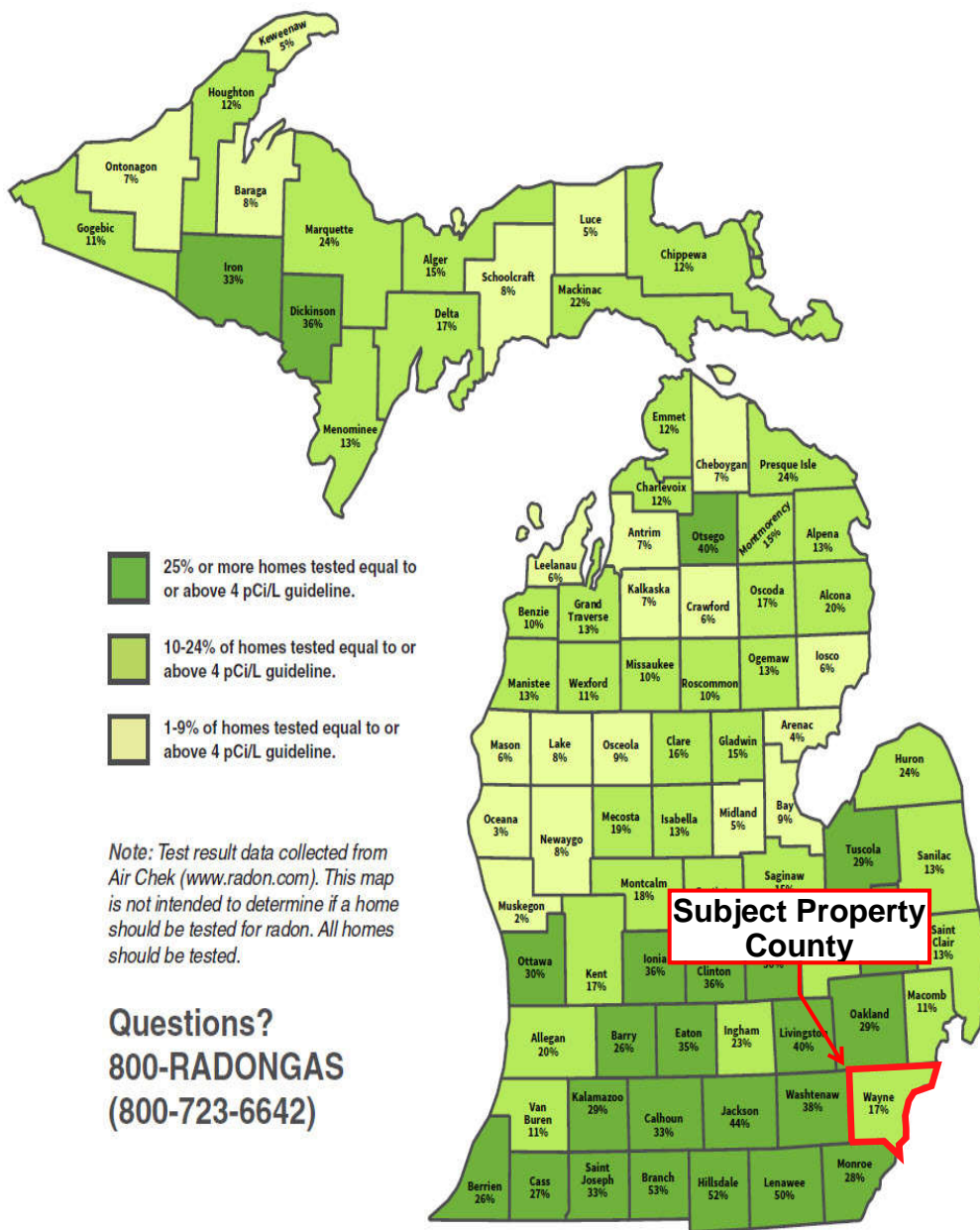
Agency: Environmental Quality

Some counties are known to have a higher likelihood of having homes with elevated radon. Check out the map below to see if homes in your county typically have elevated radon levels. Keep in mind that homes in counties with a lower likelihood of having high radon levels should still be tested.

While your neighbor's test results may give you an idea of the potential for a problem in your home, radon levels can vary significantly from lot to lot and home to home. Do not rely on your neighbor's test results to determine your risk. Test your own home and be certain! Find additional details on county radon levels on-line at [http://mi-radon.info/MI\\_counties.html](http://mi-radon.info/MI_counties.html).

[Click here](#) to learn more about the radon survey, mapping radon levels in Michigan, and the indoor radon program.





**Stay Connected**



DEQ Calendar, Events and Training

**DEQ Contacts**

Environmental Assistance Center  
Do you have an environmental question or concern? Call our Environmental Assistance Center at 1-800-662-9278.

Staff Directory  
Media Contact  
DEQ FOIA Information

**Our Performance**

OPEN Michigan  
DEQ Scorecard

**DEQ Documents**

Reports  
Forms  
Publications  
Maps & Data

**DEQ Regulations**

DEQ Policies  
Laws & Rules  
Permits  
Regulatory Reinvention  
Boards and Advisory Groups

# Attainment Status for the National Ambient Air Quality Standards



The National Ambient Air Quality Standards (NAAQS) are health-based pollution standards set by EPA.

Areas of the state that are below the NAAQS concentration level are called attainment areas. The entire state of Michigan is in attainment for the following pollutants:

- Carbon Monoxide
- Lead
- Nitrogen Dioxide
- Particulate Matter

Non-attainment areas are those that have concentrations over the NAAQS level. Portions of the state are in non-attainment for sulfur dioxide and ozone (see map). Nonattainment status for ozone will be effective in late summer 2018.

## LEGEND



Sulfur Dioxide  
Nonattainment Area



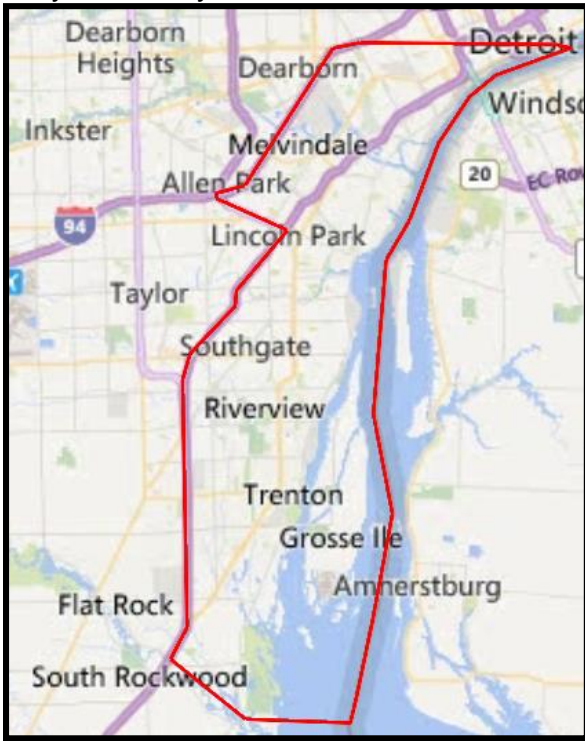
Ozone  
Nonattainment Area

See Page 2 for close-up maps of partial county nonattainment areas

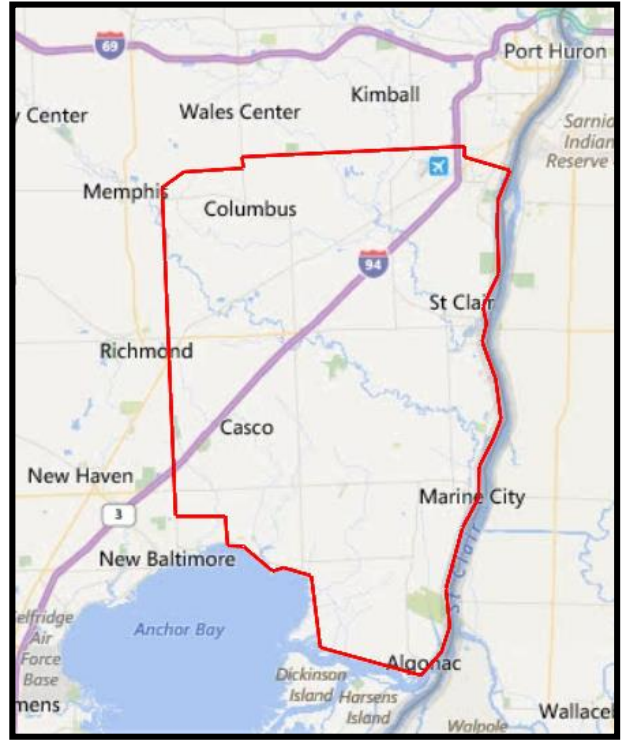
# Close-Up Maps of Partial County Nonattainment Areas

## Sulfur Dioxide Nonattainment Areas

Wayne County Area

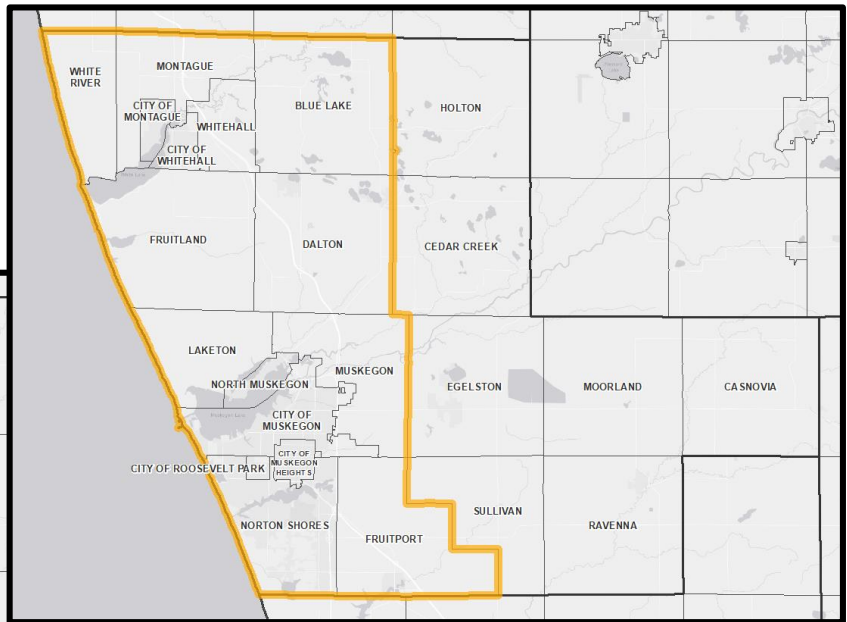
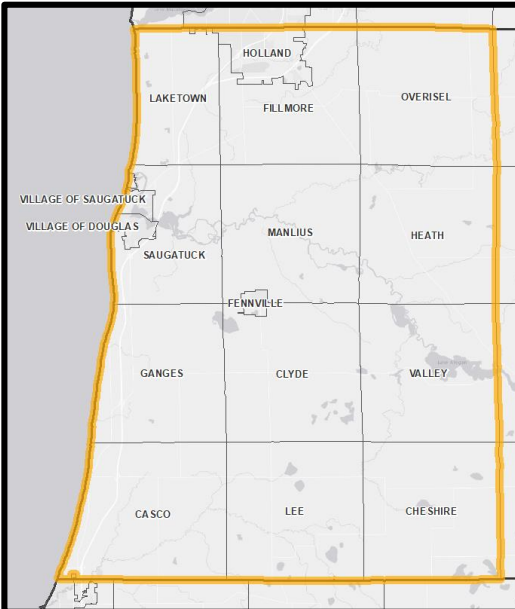


St. Clair County Area



## Ozone Nonattainment Areas

Allegan County Area



Muskegon County Area

Updated May 2, 2018

Prepared by MDEQ, Air Quality Division, State Implementation Plan Unit

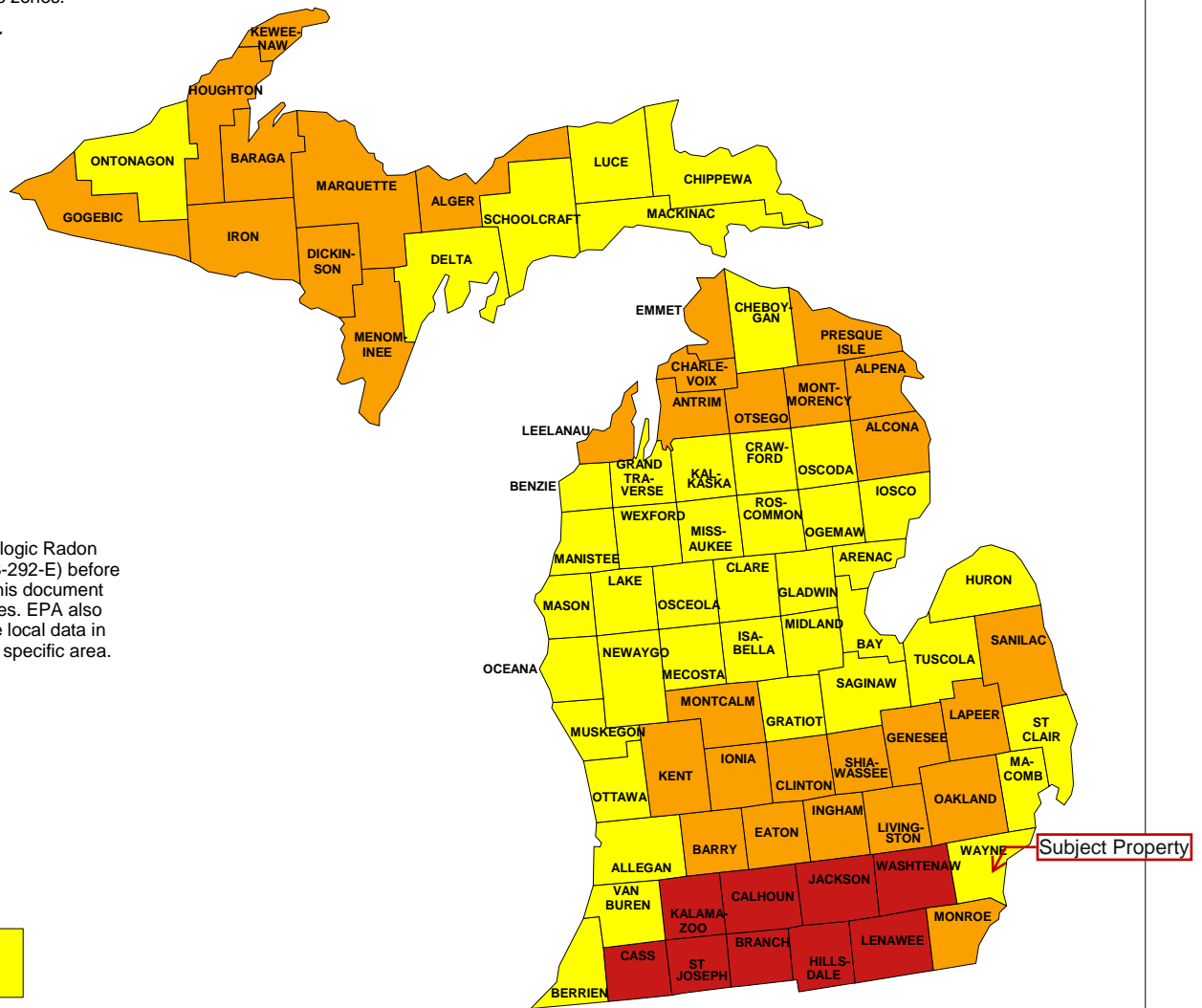
# MICHIGAN - EPA Map of Radon Zones

<http://www.epa.gov/radon/zonemap.html>

The purpose of this map is to assist National, State and local organizations to target their resources and to implement radon-resistant building codes.

This map is not intended to determine if a home in a given zone should be tested for radon. Homes with elevated levels of radon have been found in all three zones.

**All homes should be tested, regardless of zone designation.**



**IMPORTANT:** Consult the publication entitled "Preliminary Geologic Radon Potential Assessment of Michigan" (USGS Open-file Report 93-292-E) before using this map. <http://energy.cr.usgs.gov/radon/grpinfo.html> This document contains information on radon potential variations within counties. EPA also recommends that this map be supplemented with any available local data in order to further understand and predict the radon potential of a specific area.



Zone 1



Zone 2



Zone 3



# Attainment Status for the National Ambient Air Quality Standards

The National Ambient Air Quality Standards (NAAQS) are health-based pollution standards set by EPA.

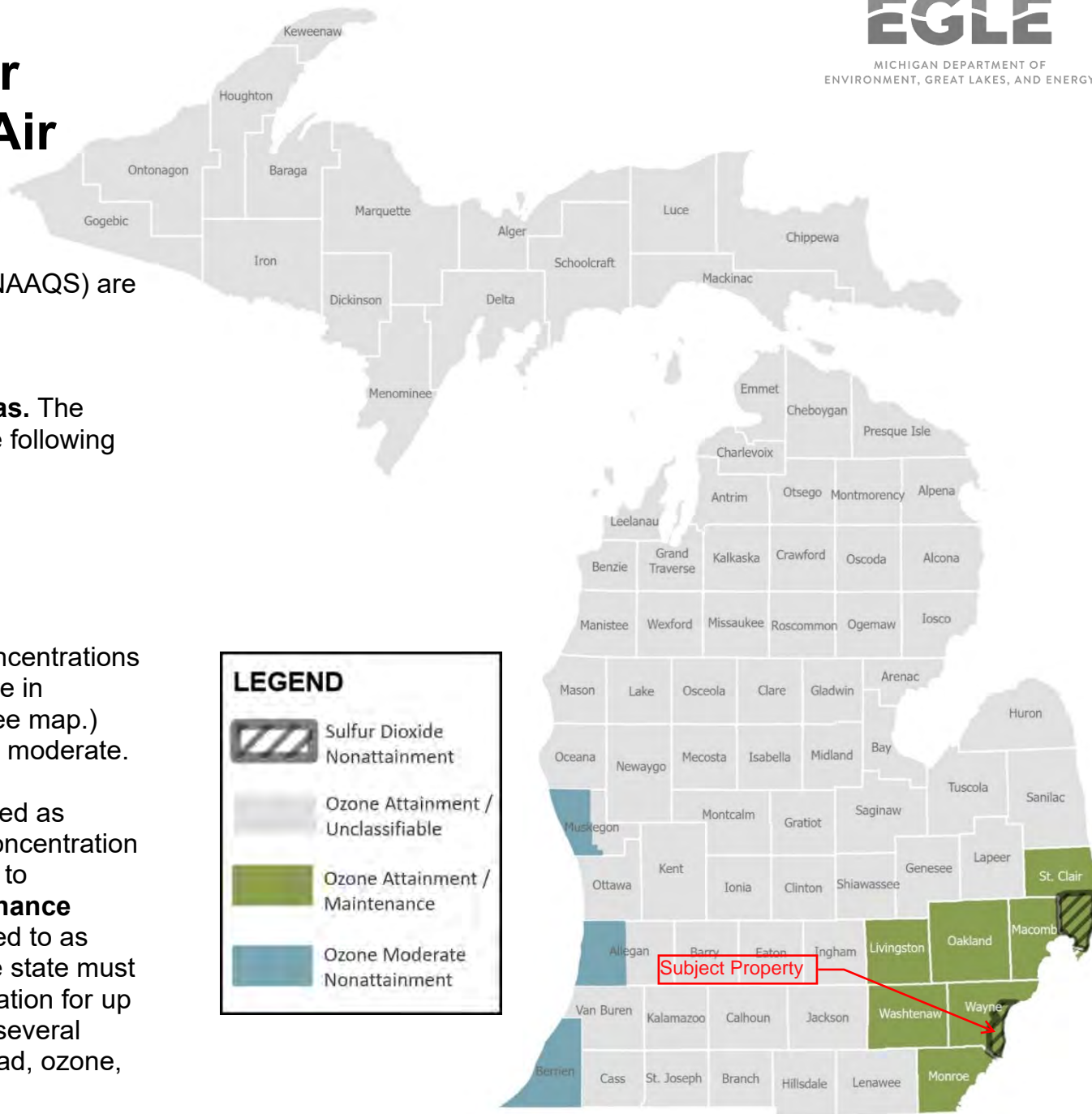
Areas of the state that are below the NAAQS concentration level are called **attainment areas**. The entire state of Michigan is in attainment for the following pollutants:

- Carbon Monoxide (CO)
- Lead (Pb)
- Nitrogen Dioxide (NO<sub>2</sub>)
- Particulate Matter (PM<sub>10</sub> & PM<sub>2.5</sub>)

**Nonattainment areas** are those that have concentrations over the NAAQS level. Portions of the state are in nonattainment for sulfur dioxide and ozone (see map.) The ozone nonattainment area is classified as moderate.

Areas of the state that were previously classified as nonattainment but have since reduced their concentration levels below the NAAQS can be redesignated to attainment and are called **attainment/maintenance areas**. These areas are also commonly referred to as “attainment” after reclassification, however the state must continue monitoring and submitting documentation for up to 20 years after the redesignated. There are several maintenance areas throughout the state for lead, ozone, and particulate matter.

*\*For readability purposes the map only includes the most recently reclassified ozone maintenance area in southeast Michigan. For more information, please consult the [Michigan.gov/AIR](http://Michigan.gov/AIR) webpage or contact the division directly.*



**LEGEND**

- Sulfur Dioxide Nonattainment
- Ozone Attainment / Unclassifiable
- Ozone Attainment / Maintenance
- Ozone Moderate Nonattainment

*\*See Page 2 for close-up maps of partial county nonattainment areas.*

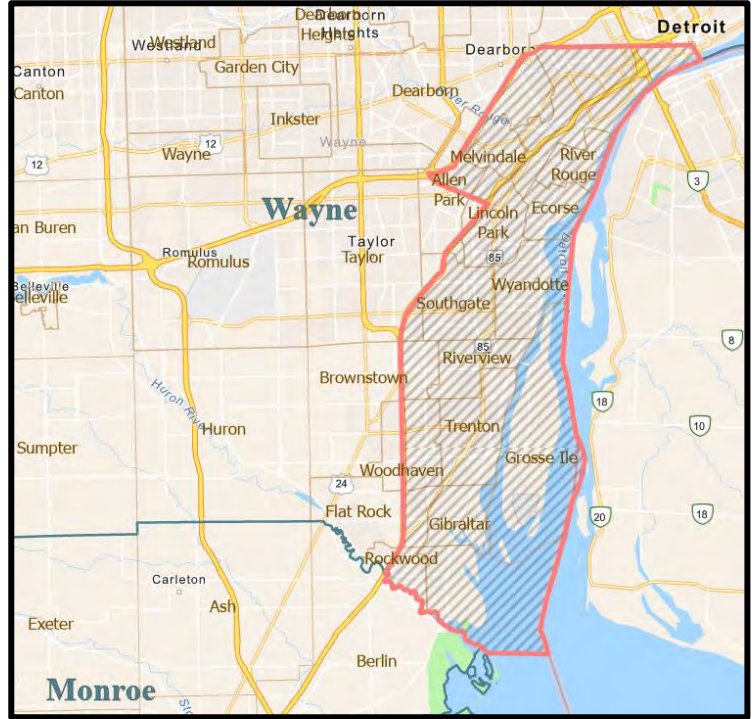
# Close-Up Maps of Partial County Nonattainment Areas

## Sulfur Dioxide Nonattainment Areas

St. Clair County



Wayne County

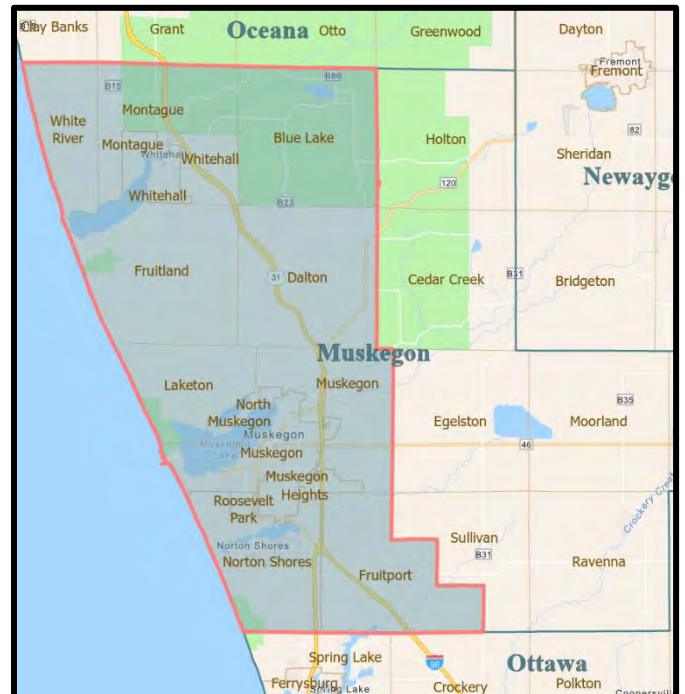


## Ozone Moderate Nonattainment Areas

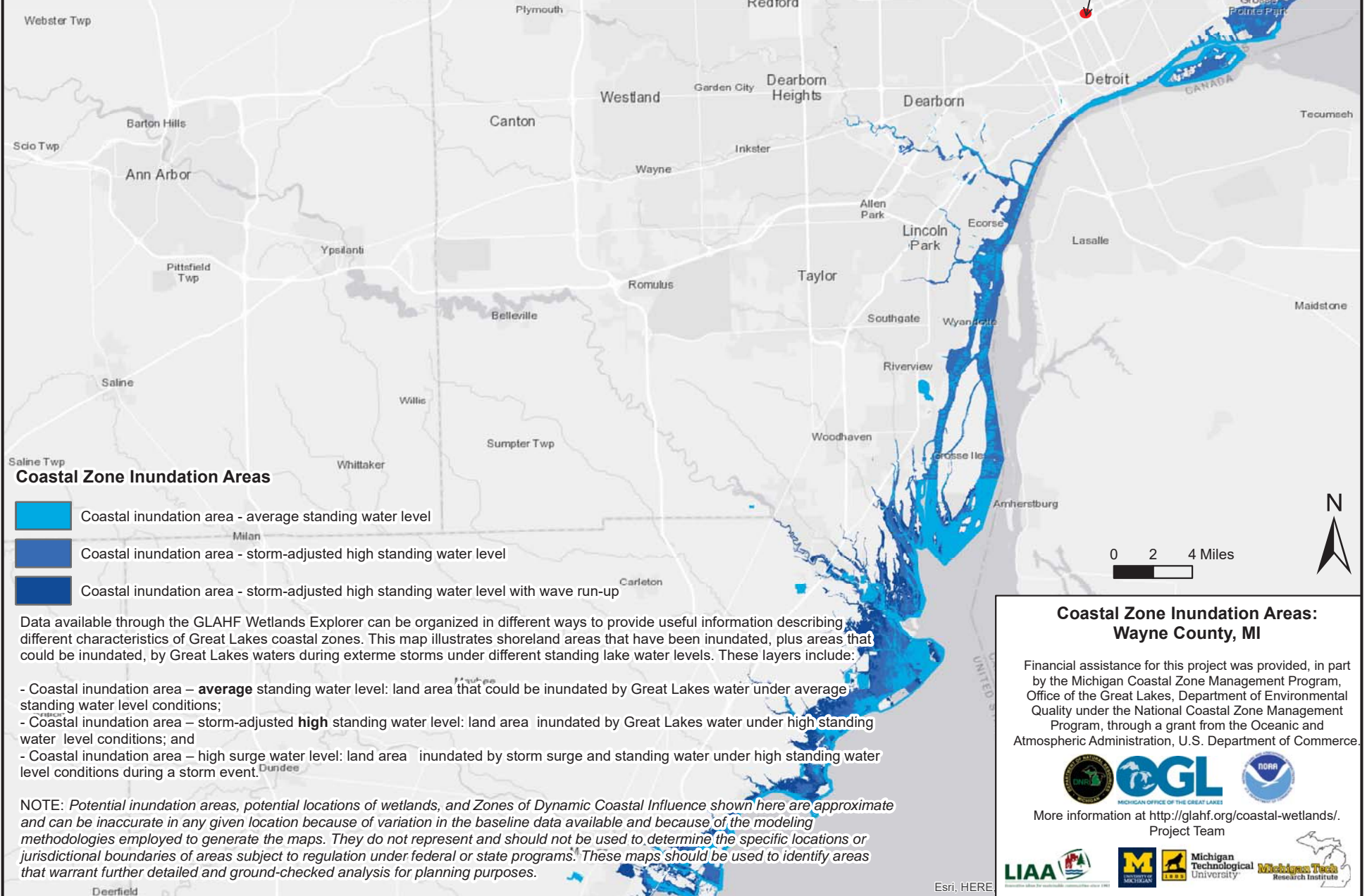
Allegan County



Muskegon County









## Endangered Species Act (CEST and EA)

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
<b>References</b>		
<a href="https://www.hudexchange.info/environmental-review/endangered-species">https://www.hudexchange.info/environmental-review/endangered-species</a>		

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

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

Yes, the activities involved in the project have the potential to affect species and/or habitats. → *Continue to Question 2.*

### 2. Are federally listed species or designated critical habitats present in the action area?

Obtain a list of protected species from the Services. This information is available on the [FWS Website](#) or you may contact your [local FWS](#) and/or [NMFS](#) offices directly.

No, the project will have No Effect due to the absence of federally listed species and designated critical habitat.

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

*may include letters from the Services, species lists from the Services' websites, surveys or other documents and analysis showing that there are no species in the action area.*

- Yes, there are federally listed species or designated critical habitats present in the action area. → *Continue to Question 3.*

**3. What effects, if any, will your project have on federally listed species or designated critical habitat?**

- No Effect: Based on the specifics of both the project and any federally listed species in the action area, you have determined that the project will have absolutely no effect on listed species or critical habitat.

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination. Documentation should include a species list and explanation of your conclusion, and may require maps, photographs, and surveys as appropriate.*

- May Affect, Not Likely to Adversely Affect: Any effects that the project may have on federally listed species or critical habitats would be beneficial, discountable, or insignificant.

→ *Continue to Question 4, Informal Consultation.*

- Likely to Adversely Affect: The project may have negative effects on one or more listed species or critical habitat.

→ *Continue to Question 5, Formal Consultation.*

**4. Informal Consultation is required**

Section 7 of ESA (16 USC. 1536) mandates consultation to resolve potential impacts to endangered and threatened species and critical habitats. If a HUD-assisted project may affect any federally listed endangered or threatened species or critical habitat, then compliance is required with Section 7. See 50 CFR Part 402 Subpart B Consultation Procedures.

**Did the Service(s) concur with the finding that the project is Not Likely to Adversely Affect?**

- Yes, the Service(s) concurred with the finding.

→ *Based on the response, the review is in compliance with this section. Continue to Question 6 and provide the following:*

- (1) A biological evaluation or equivalent document*
- (2) Concurrence(s) from FWS and/or NMFS*
- (3) Any other documentation of informal consultation*

*Exception: If finding was made based on procedures provided by a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office, provide whatever documentation is mandated by that agreement.*

No, the Service(s) did not concur with the finding. → Continue to Question 5.

**5. Formal consultation is required**

Section 7 of ESA (16 USC 1536) mandates consultation to resolve potential impacts to federally listed endangered and threatened species and critical habitats. If a HUD assisted project may affect any endangered or threatened species or critical habitat, then compliance is required with Section 7. See 50 CFR Part 402 Subpart B Consultation Procedures.

→ Once consultation is complete, the review is in compliance with this section. Continue to Question 6 and provide the following:

- (1) A biological assessment, evaluation, or equivalent document
- (2) Biological opinion(s) issued by FWS and/or NMFS
- (3) Any other documentation of formal consultation

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

Mitigation as follows will be implemented:

No mitigation is necessary.

**Explain why mitigation will not be made here:**

**Worksheet Summary**

**Compliance Determination**

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

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

This project does not involve activities which may disturb natural vegetation or critical habitat. The project is located in a highly urbanized residential area. Additionally, the actions will be completed on developed homes. Therefore, this project will have no effect on listed or proposed endangered or threatened species. Consultation with the U.S. Fish and Wildlife Service or the State of Michigan Department of Natural Resources is not required.

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

Yes

No

## Explosive and Flammable Hazards (CEST and EA)

General requirements	Legislation	Regulation
HUD-assisted projects must meet Acceptable Separation Distance (ASD) requirements to protect them from explosive and flammable hazards.	N/A	24 CFR Part 51 Subpart C
<b>Reference</b>		
<a href="https://www.hudexchange.info/environmental-review/explosive-and-flammable-facilities">https://www.hudexchange.info/environmental-review/explosive-and-flammable-facilities</a>		

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

→ Continue to Question 2.

Yes

Explain:

→ Go directly to Question 5.

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

No

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

Yes

→ Continue to Question 3.

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

- Containers 100 gallons or less in capacity, containing common liquid industrial fuels OR
- Containers of liquified petroleum gas (LPG) or propane with a water volume capacity of 1,000 gallons or less that meet the requirements of the 2017 version of National Fire Protection Association (NFPA) Code 58.

If all containers within the search area fit the above criteria, answer “no.” For any other type of aboveground storage container within the search area that holds one of the

flammable or explosive materials listed in Appendix I of 24 CFR part 51 subpart C, answer “yes.”

No

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

Yes

→ Continue to Question 4.

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

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

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

Yes

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

No

→ Go directly to Question 6.

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

Please visit HUD’s website for information on calculating Acceptable Separation Distance.

Yes

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

No

→ Provide map(s) showing the location of the project site relative to residences and any other facility or area where people congregate or are present and your separation distance calculations.  
Continue to Question 6.

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

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

**Worksheet Summary**

**Compliance Determination**

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

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

This project provides financial assistance to address existing residential structures within the City of Detroit. This project is not the development of a hazardous facility and does not increase residential densities, convert structures to residential use, or make any vacant structure suitable for habitation. Therefore, no further action is required.

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

- Yes
- No

## Farmlands Protection (CEST and EA)

General requirements	Legislation	Regulation
The Farmland Protection Policy Act (FPPA) discourages federal activities that would convert farmland to nonagricultural purposes.	Farmland Protection Policy Act of 1981 (7 U.S.C. 4201 et seq.)	<a href="#">7 CFR Part 658</a>
Reference		
<a href="https://www.hudexchange.info/environmental-review/farmlands-protection">https://www.hudexchange.info/environmental-review/farmlands-protection</a>		

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

Yes → *Continue to Question 2.*

No

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

The project involves work on existing single-family residential homes within the City of Detroit. Therefore, agricultural land will not be converted.

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

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

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

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

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

Yes → *Continue to Question 3.*



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

- Complete form **AD-1006**, "Farmland Conversion Impact Rating" [http://www.nrcs.usda.gov/Internet/FSE\\_DOCUMENTS/stelprdb1045394.pdf](http://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb1045394.pdf) and contact the state soil scientist before sending it to the local NRCS District Conservationist.  
(NOTE: for corridor type projects, use instead form **NRCS-CPA-106**, "Farmland Conversion Impact Rating for Corridor Type Projects: [http://www.nrcs.usda.gov/Internet/FSE\\_DOCUMENTS/stelprdb1045395.pdf](http://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb1045395.pdf).)
- Work with NRCS to minimize the impact of the project on the protected farmland. When you have finished with your analysis, return a copy of form AD-1006 (or form NRCS-CPA-106 if applicable) to the USDA-NRCS State Soil Scientist or his/her designee informing them of your determination.

**Document your conclusion:**

- Project will proceed with mitigation.

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

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

- Project will proceed without mitigation.

**Explain why mitigation will not be made here:**

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

## **Worksheet Summary**

### **Compliance Determination**

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

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

The City of Detroit is located within an urbanized area as defined by the U.S. Census Bureau. The project involves work on existing single-family residential homes within the City of Detroit. Therefore, this project will not impact any prime or unique farmland.

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

Yes

No

## APPENDIX C

### PROGRAMMATIC EXCLUSIONS

The following project activities, which have limited potential to affect Historic Properties and do not require further review from the SHPO when the Undertakings are limited solely to these activities:

#### A. Site Improvements

1. Reconstruction of roads where no change in width, surface materials, surface treatments, or vertical alignments of drainage is to occur.
2. Repair/replacement of existing curbs and sidewalks with identical materials within existing dimensions.
3. Repair/replacement of water, gas, storm, and/or sewer lines if it occurs within the dimensions of the original trench and permanent impacts upon surface treatments or landscape features which contribute to the historic or architectural significance of the resource are avoided.
4. Tree plantings adjacent to right-of-way.
5. Repainting parking spaces or streets.

#### B. Interior Rehabilitation

The following may proceed without review if permanent impacts upon interior elements or surface treatments that contribute to the historic or architectural significance of the buildings are avoided.

1. All plumbing rehab/replacement - includes pipes and fixtures.
2. Heating, Venting, and Air-conditioning Systems – rehab, replacement, cleaning provided that no new venting or new venting locations are needed. If new venting is needed, it shall be located on the rear of the structure and shall not be visible from the public right-of-way.
3. Electrical work.
4. Restroom improvements for handicapped access - provided that work is contained within the existing restroom.
5. Interior surface treatments (floors, walls, ceilings, and woodwork) provided the work is restricted to repainting, refinishing, re-papering, or laying carpet or linoleum and the feature is not significant to the integrity of the property.
6. Installation of insulation provided it is restricted to attics and crawl spaces, upper surfaces of existing ceilings and the ceilings are not dropped, and proper vapor barriers are used. Also, wall insulation should not be installed in historic frame buildings unless an adequate vapor barrier can be added to the interior face of the wall. Insulation must be kept dry to function properly, and therefore requires a

vapor barrier and some provision for air movement. Introducing insulation in wall cavities without a vapor barrier and some ventilation can lead to problems such as paint failure or the deterioration of wood members.

7. Repair of or pouring of concrete cellar floor.
8. Installation of new kitchen and bath appliances, cabinets, counters, tubs, sinks and toilets.
9. Repair or replacement of concrete basement floors and interior basement walls.
10. Replacement of door locks.

C. Exterior Rehabilitation

1. Caulking, weather stripping and replacement of window glass with glass of the same surface qualities (color, texture, and reflectivity).
2. Installation or replacement of gutters and downspouts (if the color is historically appropriate for the period and style of the historic resource).
3. Flat or shallow pitch roof repair/replacement (shallow pitch is understood to have a rise-to-run ratio equal to or less than 3 inches to 12 inches), with no part of the surface of the roof visible from the ground.
4. New storm windows - provided they conform to shape and size of historic windows and that the meeting rail coincides with that of the existing sash. Color should match trim; mill finish aluminum is not acceptable. Repair or repainting of existing storm windows.
5. In-kind replacement - this is understood to mean that the new features/items will duplicate the material, dimensions, configuration and detailing of the original of the following:
  - a. Porches - railings, posts/columns, brackets, cornices, steps, flooring
  - b. Roofs
  - c. Siding
  - d. Exterior architectural details and features
  - e. Windows – this is understood to include both the frame, panes, and sash
  - f. Doors
  - g. Cellar/bulkhead doors
6. Painting previously painted surfaces in color(s) historically appropriate for the period and style of the historic resource.
7. Repair of existing wheelchair ramps.
8. Repair, replace, or install new sidewalks or driveways that match the existing sidewalk or driveway in materials and dimensions.
9. Repair or replacement of chimneys with the same material and dimensions.

required, except in extraordinary circumstances (see § 58.2(a)(3)) in which a normally excluded activity may have a significant impact. Compliance with the other applicable Federal environmental laws and authorities listed in § 58.5 is required for any categorical exclusion listed in paragraph (a) of this section.

(a) *Categorical exclusions subject to § 58.5.* The following activities are categorically excluded under NEPA, but may be subject to review under authorities listed in § 58.5:

(1) Acquisition, repair, improvement, reconstruction, or rehabilitation of public facilities and improvements (other than buildings) when the facilities and improvements are in place and will be retained in the same use without change in size or capacity of more than 20 percent (e.g., replacement of water or sewer lines, reconstruction of curbs and sidewalks, repaving of streets).

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

(3) Rehabilitation of buildings and improvements when the following conditions are met:

(i) In the case of a building for residential use (with one to four units), the density is not increased beyond four units, and the land use is not changed;

(ii) In the case of multifamily residential buildings:

(A) Unit density is not changed more than 20 percent;

(B) The project does not involve changes in land use from residential to non-residential; and

(C) The estimated cost of rehabilitation is less than 75 percent of the total estimated cost of replacement after rehabilitation.

(iii) In the case of non-residential structures, including commercial, industrial, and public buildings:

(A) The facilities and improvements are in place and will not be changed in size or capacity by more than 20 percent; and

(B) The activity does not involve a change in land use, such as from non-residential to residential, commercial

to industrial, or from one industrial use to another.

(4)(i) An individual action on up to four dwelling units where there is a maximum of four units on any one site. The units can be four one-unit buildings or one four-unit building or any combination in between; or

(ii) An individual action on a project of five or more housing units developed on scattered sites when the sites are more than 2,000 feet apart and there are not more than four housing units on any one site.

(iii) Paragraphs (a)(4)(i) and (ii) of this section do not apply to rehabilitation of a building for residential use (with one to four units) (see paragraph (a)(3)(i) of this section).

(5) Acquisition (including leasing) or disposition of, or equity loans on an existing structure, or acquisition (including leasing) of vacant land provided that the structure or land acquired, financed, or disposed of will be retained for the same use.

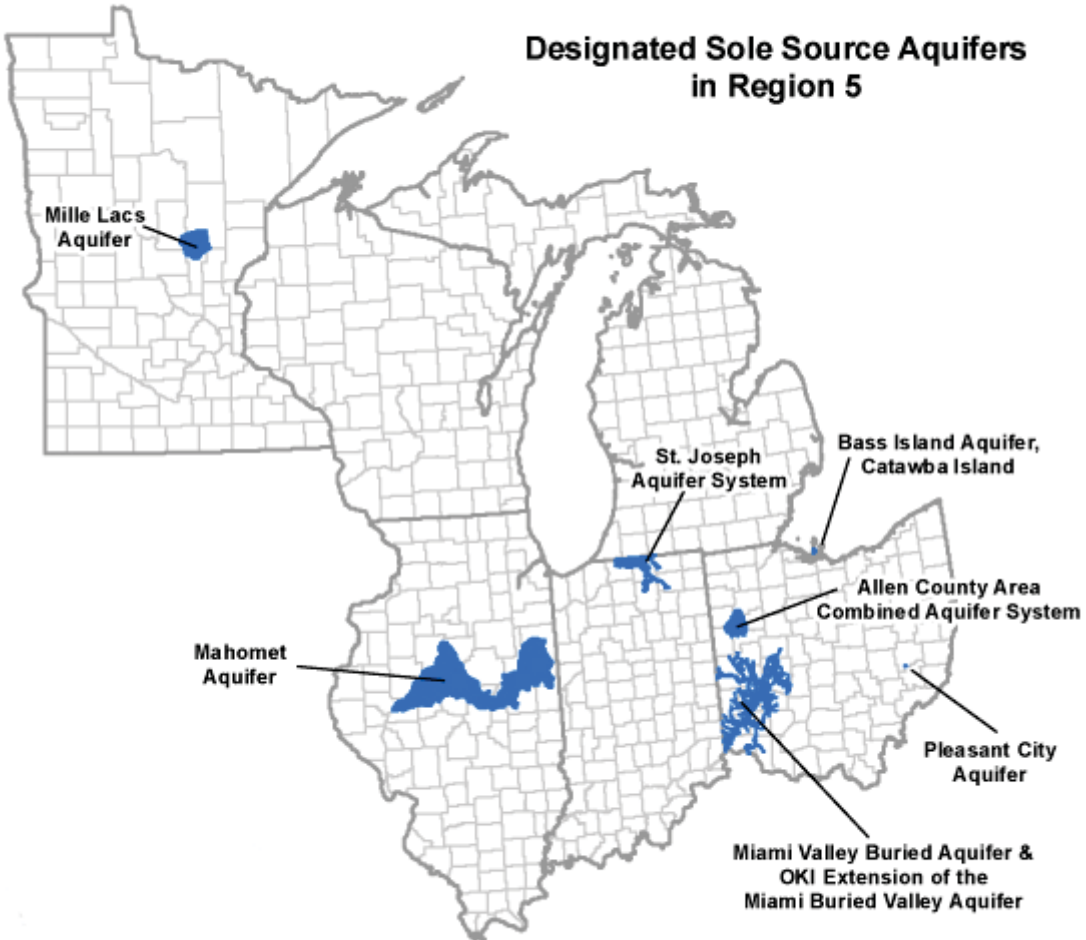
(6) Combinations of the above activities.

(b) *Categorical exclusions not subject to § 58.5.* The Department has determined that the following categorically excluded activities would not alter any conditions that would require a review or compliance determination under the Federal laws and authorities cited in § 58.5. When the following kinds of activities are undertaken, the responsible entity does not have to publish a NOI/RROF or execute a certification and the recipient does not have to submit a RROF to HUD (or the State) except in the circumstances described in paragraph (c) of this section. Following the award of the assistance, no further approval from HUD or the State will be needed with respect to environmental requirements, except where paragraph (c) of this section applies. The recipient remains responsible for carrying out any applicable requirements under § 58.6.

(1) Tenant-based rental assistance;

(2) Supportive services including, but not limited to, health care, housing services, permanent housing placement, day care, nutritional services, short-term payments for rent/mortgage/utility costs, and assistance in

**Designated Sole Source Aquifers  
in Region 5**





## Wetlands (CEST and EA)

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

**1. Does this project involve new construction as defined in Executive Order 11990, expansion of a building's footprint, or ground disturbance?**

The term "new construction" shall include draining, dredging, channelizing, filling, diking, impounding, and related activities and any structures or facilities begun or authorized after the effective date of the Order.

No → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.*

Yes → *Continue to Question 2.*

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

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

No, a wetland will not be impacted in terms of E.O. 11990's definition of new construction.  
→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map or any other relevant documentation to explain your determination.*

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

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

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

Continue to Question 3.

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

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

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



### **Worksheet Summary**

#### **Compliance Determination**

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

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

The project does not involve new construction. Therefore, the project is in compliance with Executive Order 11990.

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

Yes

No



## TIER II ENVIRONMENTAL REVIEW

Of Activities or Projects Seeking Financial Assistance from a Funding Program Administered by the  
U.S. Department of Housing and Urban Development Department, Subject to 24 CFR 58

### PROJECT INFORMATION

#### **Project Name**

CDBG-DR Basement Backup Program Phase I

#### **Project Location**

Add the Site Address here, Detroit, Michigan

### COMPLIANCE WITH 24 CFR 58.5

#### **Floodplain Management**

Pursuant to Executive Order 11988 (42 FR 26951) and 24 CFR 55, the City of Detroit reviewed the proposed project.

The structure or residential dwelling unit is not located within the base floodplain or any Special Flood Hazard Area. See the attached FEMA FIRMette.

#### **Hazardous Materials / Toxic Chemicals / Radioactive Substances**

Pursuant to 24 CFR 58.5(i)(2), the City of Detroit reviewed the proposed project.

Based upon a review of all available records, there is no evidence to indicate that the subject property is used to dispose of, handle, process, store, or transport any hazardous material, toxic chemical, or radioactive substances. NEPAassist and Environment, Great Lakes, and Energy (EGLE) Environmental Mapper maps are attached.

Based on available information, the subject property is free of hazardous materials, contamination, toxic chemicals, gases, and radioactive substances which could affect the health or safety of occupants or conflict with the intended use of the property.

#### **Environmental Justice**

Pursuant to Executive Order 12898, the City of Detroit reviewed the proposed project.

Based upon a review of the Environmental Protection Agencies (EPA's) Environmental Justice (EJ) Screen and the scope of the project, the project will not have an adverse impact on the residents in the EJ area. EJ Screen map attached.



## COMPLIANCE WITH 24 CFR 58.6

### Flood Disaster Protection

Pursuant to the Flood Disaster Protection Act of 1973 (42 U.S.C. 4001 – 4128; 42 U.S.C. 5154a), the City of Detroit reviewed the proposed project. The structure or residential dwelling unit is not located within the base floodplain or any Special Flood Hazard Area, see the attached FEMA FIRMette.

### CERTIFICATION

I hereby certify that all information contained herein is complete and accurate to the best of my knowledge. I submit this document to satisfy requirements for the Tier II Environmental Review of a Categorical Excluded project, subject to 24 CFR 58.5, 58.6 and 58.15, per 24 CFR 58.35(a).

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**Preparer Name**

**Title, Agency**

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**Preparer Signature**

**Date**

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**City of Detroit Environmental Review**

**Title, Agency**

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**Environmental Officer Signature**

**Date**