



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

**Project Information**

**Project Name:** 111 West Street

**Responsible Entity:** City of Englewood

**Grant Recipient  
(if different than Responsible Entity):** Englewood Housing Authority

**State/Local Identifier:**

**Preparer:** Lindsay Garrard, AEI Consultants

**Certifying Officer Name and Title:**

**Consultant  
(if applicable):** AEI Consultants

**Direct Comments to:** Domingo Senande  
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**Project Location:** 111 West Street  
Englewood, Bergen County, New Jersey 07631

The subject property consists of the Vincent K. Tibbs Apartments community in an urbanized area characterized by a mix of residential and commercial uses. The Bergen County Assessor's parcel number for the subject property is 0215-910-10.01. The property is bound by apartments to the north, commercial buildings to the east, Demarest Avenue followed by a park and commercial buildings to the south, and West Street followed by multi-family residential and commercial uses to the west.

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

The Vincent K. Tibbs Apartments complex, which was constructed in 1976, consists of one six-story apartment building housing a total of 154 units for the low-income, elderly and disabled. Additional on-site improvements include asphalt-paved parking and landscaped areas. Overpeck Creek partially bisects the property from north to south in a concrete-lined stormwater channel in the central portion of the site. The site is accessed via driveway entrances to the south off Demarest Avenue and to the west via West Street.

The funding for the complex is principally generated from housing choice voucher payments provided through the US Department of Housing and Urban Development ("HUD"). Englewood Housing Authority (EHA) is proposing to use increased rents from a new RAD project-based voucher (PBV) housing assistance payments (HAP) contract to fund the onsite replacement of RAD units (the Onsite Replacement Project). Due to local code requirements the Onsite Replacement Project will bring back 130 RAD PBV units and eliminate the 22 units on the first floor. The community room on the second floor was converted into the new mechanical room where the mechanical systems were relocated from the basement. The ground floor will continue to house non-residential uses such as the housing authority's administrative offices, laundry room, and the relocated community room. This reconfiguration and reduction of units will meet local code requirements and ensure that the residential units will remain operational at full capacity in the event that future storms were to impact the first-floor spaces.

The EHA has also received County of Bergen grant money (\$540,000), FEMA relief (\$6,000,000), as well as insurance funds (\$6,679,000) to conduct a rehabilitation project to repair damage caused by Hurricane Ida. Mechanical systems were relocated from the basement to a new second floor mechanical room: the boilers and fire pump/fire alarm panel were replaced and moved from the basement to the new second floor mechanical room, the elevator system was replaced and the machine rooms moved to the second and third floors, and the generator was relocated to an outdoor elevated platform. In order to accomplish the work, approximately \$13,250,000 in construction financing is required for which HUD has increased the rents of the property so that a loan would be financially feasible.

This environmental review includes all anticipated work activities.

Proposed rehabilitation activities would include the following:

- Install new roof with new insulation
- Interior apartment renovations including new gas/water lines and storm water drainpipes; gutting bathroom and kitchens; installing exhaust fans, flooring, kitchen countertops, kitchen backsplash; replacing apartment doors; upgrading baseboard heating system; replacing AC sleeves; and new coat of paint

- Convert first floor into a community space and Englewood Housing Authority offices; adding a warming kitchen, public bathrooms, electronic door access system; installing security cameras; installing new HVAC and lighting; coat of paint
- New coat of paint and epoxy flooring in basement
- Replace windows with commercial-grade aluminum windows
- Paint all common areas; epoxy paint in all common area flooring; install HEPA filters for all common area HVAC units
- Install new gazebo with infrared heating and fans to exterior area; install new exterior lighting; install new fencing; install new exterior benches and community garden; add BBQ area; add new concrete and asphalt; install exterior security cameras
- Flood mitigation measures such as installation of flood barriers

**Level of Environmental Review Determination:**

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

3. Rehabilitation of buildings and improvements under the following conditions:

ii) In the case of multifamily residential buildings:

- A. Unit density is not changed more than 20%
- 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% of the total estimated cost of replacement after rehabilitation.

**Funding Information**

Grant Number	HUD Program	Funding Amount
		\$13,250,000

**Estimated Total HUD Funded Amount:** \$13,250,000

**Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]:** \$26,500,000

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

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

<b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 &amp; 58.6</b>		
<b>Airport Hazards</b>  24 CFR Part 51 Subpart D	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	The subject property is not located within 2,500 feet of the end of a civil airport runway or within 15,000 feet of the end of a military airfield runway. The project is in compliance with Airport Hazards requirements.
<b>Coastal Barrier Resources</b>  Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	According to review of the U.S. Fish & Wildlife Service (FWS) Coastal Barrier Resources System Mapper, the subject property is not located within a coastal barrier resource area. Therefore, this project has no potential to impact a CBRS Unit and is in compliance with the Coastal Barrier Resources Act.
<b>Flood Insurance</b>  Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes    No <input checked="" type="checkbox"/> <input type="checkbox"/>	Based on a review of the FEMA Flood Insurance Rate Map (FIRM), Community Panel Number 34003C0213H, dated August 28, 2019, the subject property is primarily located in Zone AE, designated as an area within the 100-year floodplain, with a Base Flood Elevation identified as 23.5 feet. Additionally, areas in the northern, eastern, and western portions of the subject property are located in Zone X (shaded), designated as an area within the 500-year floodplain. Lastly, the northern and southern corners of the subject property are located in Zone X (unshaded), areas of minimal flood hazard outside of the 100- and 500-year floodplains. A central portion of the subject property in Zone AE is designated as a Floodway Contained in Structure. No preliminary or pending FIRM panels were identified for the project area. In addition, the subject property is located in the City of Englewood, Community #340031, which is a participating community in the National Flood Insurance Program (NFIP).  The subject property is located in a FEMA-designated Special Flood Hazard Area (SFHA);

		<p>therefore, flood insurance is required. For loans, loan insurance or guarantees on structures or insurable property located in a FEMA-designated Special Flood Hazard Area, the amount of flood insurance coverage must at least equal the outstanding principal balance of the loan or the maximum limit of coverage made available under the NFIP, whichever is less. For grants and other non-loan forms of financial assistance, flood insurance coverage must be continued for the life of the building irrespective of the transfer of ownership. The amount of coverage must at least equal the total project cost or the maximum coverage limit of the NFIP, whichever is less.</p> <p>Englewood Housing Authority maintains a NFIP flood insurance policy through Selective Insurance Company of America. With flood insurance, the project is in compliance with flood insurance requirements.</p>
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**STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5**

<p><b>Clean Air</b></p> <p>Clean Air Act, as amended, particularly section 176(c) &amp; (d); 40 CFR Parts 6, 51, 93</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>According to the U.S. EPA Green Book and NEPAssist, the subject property is located in a severe non-attainment area for the 8-Hour Ozone 2008 National Ambient Air Quality Standard (NAAQS), in a serious non-attainment area for the 8-Hour Ozone 2015 NAAQS, and in a maintenance area for the 1971 Carbon Monoxide (CO) and 24-Hour PM<sub>2.5</sub> 2006 NAAQS. However, the proposed project would not include activities that would require further evaluation. The project is in compliance with the Clean Air Act.</p>
<p><b>Coastal Zone Management</b></p> <p>Coastal Zone Management Act, sections 307(c) &amp; (d)</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>New Jersey's coastal zone recognizes four distinct regions of the State and treats them separately. From the New York border to the Raritan Bay, the boundary extends landward from mean high water to the first road or property line. From the Raritan Bay south along the Atlantic shoreline and up to the Delaware Memorial Bridge, the boundary extends from half a mile to 24 miles inland (1,376 square miles of land area). From the Delaware Memorial Bridge northward up the Delaware River to Trenton, the boundary extends landward to the first road inclusive of all wetlands. The fourth boundary serves a 31-mile square area in the</p>

		<p>northeast corner of the state bordering the Hudson river (New Jersey Meadowlands Commission).</p> <p>The subject property is not located within one of New Jersey's coastal municipalities in the coastal zone. Therefore, this project is in compliance with the Coastal Zone Management Act.</p>
<p><b>Contamination and Toxic Substances</b></p> <p>24 CFR Part 50.3(i) &amp; 58.5(i)(2)</p>	<p>Yes No</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>A Phase I Environmental Site Assessment (ESA) was completed for the subject property on June 20, 2024 by the Environmental Investigations Group, LLC (EI). No recognized environmental conditions (RECs), historically recognized environmental conditions (HRECs), controlled recognized environmental conditions (CRECs), vapor encroachment conditions (VECs), or de minimis conditions were identified in connection with the subject property, except for the following:</p> <ul style="list-style-type: none"> <li>The adjacent property to the west of the subject property (Fabio's Auto Repair), located at 29 Demarest Avenue, was historically and currently used as an automotive repair facility, including the historic operation of underground storage tanks (USTs). Releases of contaminants into groundwater were confirmed and subsurface investigations revealed that a contamination plume extended onto a small southwestern section of the subject property. The responsible party associated with this property is currently conducting remedial activities under the general oversight of the New Jersey Department of Environmental Protection. This off-site release of contaminants onto the subject property is considered a REC.</li> </ul> <p>EI recommended no further investigation at this time for this transaction.</p> <p>Various properties and facilities within a one-mile radius of the subject property with recognized environmental conditions relative to their operations are included in the database information as detailed in this report. None of these properties are within 1/8th mile of the subject property or are</p>

considered to have an adverse environmental impact on the subject property due to the nature of the condition, distance from, and/or location down gradient of the subject property.

**Lead-based Paint**

Due to the age of the subject property building, which was constructed in 1976, there is a potential that LBP is present. AEI recommends the property owner adhere to the December 2024 LBP Operations & Maintenance (O&M) Plan, prepared under a separate report cover, for on-going lead-based paint maintenance practices at the subject property. The O&M Plan stipulates that the assessment, repair and maintenance of damaged painted surfaces be performed to protect the health and safety of the building occupants. More stringent local and State regulations may apply to LBP in association with building demolition/renovations and worker/occupant protection. It should be noted that construction activities that disturb materials or paints containing any amount of lead may be subject to certain requirements of the OSHA lead standard contained in 29 CFR 1910.1025 and 1926.62.

**Asbestos**

On behalf of EHA, Sky Environmental Services, Inc. (Sky) was retained to complete a pre-renovation asbestos survey for the subject property in June 2024. On June 6, 2024, Mr. Justin DiRicco, an accredited EPA AHERA Asbestos Inspector, conducted the inspection in accordance with applicable NJDOL and AHERA requirements to verify the presence/absence of asbestos within the residential units which will be impacted by the proposed renovations. Upon completion of the inspection, the samples were submitted to AAL, Inc. of East Brunswick, NJ for analysis under a fully executed chain-of-custody. The samples were analyzed by EPA Method 600/M4/82/020, Polarized Light Microscopy (PLM) with dispersion staining as required for friable type materials and by Transmission Electron Microscopy (TEM) method for non-friable materials. Based on the field observation

and results of sample analyses, no asbestos was confirmed within the drywall/joint compound composites, base cove glue, ceramic tile grout and sink undercoating. However, the presence of ACM was identified present within the vast majority of 12-inch floor tiles and the associated mastic.

If the identified ACM is to be impacted by any proposed renovations, the Owner must retain services of a NJDOL licensed Asbestos Abatement Contractor to properly abate the identified interior ACM in accordance either with NJDCA Subchapter 8 requirements or using NJDOH approved non-friable work procedures. If any suspect materials are identified during demolition/renovation activities that were not previously sampled, they should be sampled by a licensed asbestos inspector and handled accordingly. In addition, AEI recommends the property owner adhere to the December 2024 Asbestos O&M Plan, prepared under a separate report cover, that stipulates that the assessment, repair and maintenance of damaged materials be performed to protect the health and safety of the building occupants.

**Radon**

In accordance with HUD CPD-23-103: Departmental Policy for Addressing Radon in the Environmental Review Process, issued on January 11, 2024, radon must be considered in the contamination analysis for 24 CFR Parts 50 or 58, as applicable. Available science-based information was utilized to determine whether the project site is located in an area that has average documented radon levels at or above 4.0 pCi/L that require mitigation. According to radon testing results from the State of New Jersey available for Bergen County through the CDC's National Environmental Public Health Tracking Network, the annual mean pre-mitigation radon measurements in tested buildings over the latest 10-year period from 2013 to 2022 is approximately 1.5 pCi/L, below the EPA action level of 4.0 pCi/L. As such, radon mitigation is not required for the subject property per CPD-23-103.



<p><b>Endangered Species</b></p> <p>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>According to the IPaC Resource list, two (2) threatened, endangered, or candidate species may be located in the project area: the Tricolored Bat and the Monarch Butterfly.</p> <p>The subject property is a previously developed site in an urbanized area and provides little habitat value to flora or fauna. The proposed project, which would consist of rehabilitation of an existing multifamily building, would have no effect on listed species and therefore is in compliance with the Endangered Species Act.</p>
<p><b>Explosive and Flammable Hazards</b></p> <p>24 CFR Part 51 Subpart C</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>Properties that are located near hazardous industrial operations handling fuels or chemicals of an explosive or flammable nature are subject to HUD safety standards (24 CFR 51, Subpart C). In the case of tanks containing common liquid fuels, the requirement for an acceptable separation distance (ASD) calculation only applies to storage tanks that have a capacity of more than 100 gallons.</p> <p>According to the June 2024 Phase I ESA completed by EI, a diesel backup emergency generator was observed in the northern portion of the subject property. The generator was observed to contain an internal belly tank with a capacity to store 358 gallons of product; however, at the time of EI's inspection, the generator was non-operational and no diesel was stored. Thus, ASD calculations are not required for this AST.</p> <p>Review of aerial imagery within a 1-mile radius of the subject property identified one (1) approximately 1,000-gallon AST associated with First Student Inc. (170 South Dean Street), approximately 3,690 feet southwest of the subject property.</p> <p>To demonstrate compliance with 24 CFR Part 51 Subpart C, AEI has utilized the HUD ASD Electronic Assessment Tool to determine the threshold capacities for tanks located within 1.0 mile of the subject property. To fail ASDs for Thermal Radiation for People (most conservative distance), tanks must exceed 43,000 gallons in capacity when located 0.25 miles (1,320 feet)</p>

		<p>from the property; 225,000 gallons when located 0.50 miles (2,640 feet) from the property; and 595,000 gallons when located 0.75 miles (3,960 feet) from the property. Based on these capacities and calculations, ASTs that do not exceed these capacity thresholds are located at acceptable separation distances for Blast Over Pressure, Thermal Radiation for People, and Thermal Radiation for Buildings, and ASD calculations are therefore not required in these circumstances.</p> <p>Based on the AST size and distance from the subject property, it does not exceed the minimum threshold capacity for unacceptable separation as discussed above. Furthermore, based on the project description, the project includes no activities that would require further evaluation under this section. The project is in compliance with explosive and flammable hazard requirements.</p>
<p><b>Farmlands Protection</b></p> <p>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>According to NEPAssist, the subject property is located in an urbanized area and based on the project description, the project includes no activities that would convert potential farmland; therefore, the project would not negatively impact prime farmland. The project is in compliance with the Farmland Protection Policy Act.</p>
<p><b>Floodplain Management</b></p> <p>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p>Yes No</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>Projects located within a flood hazard area are subject to Executive Order 11988 (Floodplain Management). Additionally, Executive Order 13690 (Establishing a Federal Flood Risk Management Standard (FFRMS) and a Process for Further Soliciting and Considering Stakeholder Input) revised EO 11988 and established a new FFRMS to address current and future flood risk, improve resiliency, and ensure that projects funded with taxpayer dollars last as long as intended. HUD's regulations in 24 CFR Part 55 outline HUD's procedures for complying with EOs 11988 and EO 13690. HUD's Final Rule to implement FFRMS was published on April 23, 2024. The Final Rule defines a new floodplain of concern, the FFRMS floodplain, which extends beyond the 100-year floodplain. The Final Rule also defines the viable approaches to</p>

determining the extent of the FFRMS floodplain designed to account for increased flood risk over time.

For compliance with EO 13690, AEI determined the FFRMS floodplain to evaluate flooding risk to the subject property. Climate-informed science approach (CISA) data is not available for the subject property area. In the absence of CISA data, AEI utilized the 0.2% annual chance floodplain (the 500-year floodplain) to determine the FFRMS floodplain.

Based on a review of the FEMA Flood Insurance Rate Map (FIRM), Community Panel Number 34003C0213H, dated August 28, 2019, the subject property is primarily located in Zone AE, designated as an area within the 100-year floodplain, with a Base Flood Elevation identified as 23.5 feet. Additionally, areas in the northern, eastern, and western portions of the subject property are located in Zone X (shaded), designated as an area within the 500-year floodplain. Lastly, the northern and southern corners of the subject property are located in Zone X (unshaded), areas of minimal flood hazard outside of the 100- and 500-year floodplains. A central portion of the subject property in Zone AE is designated as a Floodway Contained in Structure. No preliminary or pending FIRM panels were identified for the project area. In addition, the subject property is located in the City of Englewood, Community #340031, which is a participating community in the National Flood Insurance Program (NFIP).

The project is located within the FFRMS floodplain. Therefore, the Modified 8-Step Decision Making Process is required for compliance with Executive Orders 11988 and 13690 and to comply with the regulations at 24 CFR Part 55.

On January 13, 2025, AEI completed a Modified 8-Step for the subject property. The following actions will be implemented and/or maintained:

- All new and renewal leases must contain acknowledgements signed by the residents indicating that they have been advised that the property is in a

		<p>floodplain and the Evacuation Plan should be provided to residents</p> <ul style="list-style-type: none"> <li>Flood insurance will be maintained for subject property structure.</li> </ul>
<p><b>Historic Preservation</b></p> <p>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>Review of the National Register of Historic Places (NRHP) map indicates that neither the subject property nor the immediate surrounding properties are listed on the NRHP. Review of the New Jersey Cultural Resources Information System (CRGIS) LUCY map indicates the subject property was identified as a historical site under the name Vicente K. Tibbs Senior as part of a prior architecture intensive survey done in 2017 with an Evaluation finding of Not Eligible. Additionally, the east and west adjoining properties are similarly identified. Lastly, the eligible Englewood Downtown Historic District adjoins the subject property to the south.</p> <p>According to an October 28, 2024 letter from Ms. Elaine Kiernan Gold, Historic Preservation Specialist with the County of Bergen Community Development, the subject property was assessed as part of the Area of Potential Effects of the proposed Hudson-Bergen Lightrail extension but was found to be "less than 50 years old and not of exceptional importance, in accordance with NJ-HPO survey guidelines." The NJ-HPO (SHPO) concurred with this 2017 report finding. In addition, according to BC-DCHA archaeological resources on file, no pre-historic or historic archaeological sites were identified in the proposed project area or the vicinity. Ms. Kiernan Gold determined that the proposed project does not affect any identified historic structures or archaeological sites.</p> <p>Based on this information, AEI anticipates No Effect to historic properties. AEI has submitted the project to SHPO for Section 106 review and concurrence with a finding of No Historic Properties Affected. In a response dated January 15, 2025, NJ-HPO found that there are no historic properties affected by the referenced project.</p>
<p><b>Noise Abatement and Control</b></p> <p>Noise Control Act of 1972, as amended by the Quiet</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>Based on a review of available maps, the subject property is located within 15 miles of the LaGuardia Airport, Teterboro Airport, Little Ferry Seaplane Base, Downtown Manhattan/Wall</p>

<p>Communities Act of 1978; 24 CFR Part 51 Subpart B</p>		<p>Street Heliport, West 30<sup>th</sup> Street Heliport, East 34<sup>th</sup> Street Heliport, Evers Seaplane Base, New York Skyports Inc Seaplane Base, Sands and Point Seaplane Base. The property is also within 1,000 feet of North Dean Street and Engle Street. A railroad is identified in NEPAAssist along the eastern subject property boundary. Further research indicates the railroad is no longer present and has been decommissioned.</p> <p>The proposed project would consist of rehabilitation of an existing multifamily residential property with no proposed new construction, conversion, or increase in residential density. A noise assessment is not required. The project is in compliance with HUD's Noise regulation.</p>
<p><b>Sole Source Aquifers</b></p> <p>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p>Yes No  <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The subject property is not located on, nor does it affect, a sole source aquifer designated by the EPA. Based on the project description, the project consists of activities that are unlikely to have an adverse impact on groundwater resources. The project is in compliance with Sole Source Aquifer requirements.</p>
<p><b>Wetlands Protection</b></p> <p>Executive Order 11990, particularly sections 2 and 5</p>	<p>Yes No  <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>Based on a review of the U.S. Fish &amp; Wildlife Service National Wetlands Inventory (NWI) map, a riverine wetland bisects the property from north to south in the central portion of the site. This feature corresponds to Overpeck Creek, which is contained in an open concrete stormwater channel that bisects the northern half of the subject property. The proposed project would consist of rehabilitation of an existing multifamily residential property with no proposed new construction and minimal ground-disturbing activities. Thus, the project would not negatively impact wetlands, and the project is in compliance with Executive Order 11990.</p>
<p><b>Wild and Scenic Rivers</b></p> <p>Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p>	<p>Yes No  <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>Based on the National Wild &amp; Scenic Rivers system maintained by the U.S. Bureau of Land Management (BLM), National Park Service (NPS), U.S. Fish &amp; Wildlife (FWS), and the U.S. Forest Service (FS), and the National River Inventory maintained by the NPS, the subject property is not located within proximity to a Wild and Scenic River, Study River, or Nationwide Inventory</p>

		River. Therefore, the project is in compliance with the Wild and Scenic Rivers Act.
<b>ENVIRONMENTAL JUSTICE</b>		
<b>Environmental Justice</b>  Executive Order 12898	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	According to the EPA EJScreen Community Report, 24% of the subject property population is considered low-income and 72% of the population identifies as people of color. Based on the information gathered from EI's Phase I ESA, the subject property may be affected by off-site release emanating from a known former release site located to the west of the subject property, as previously discussed in Section 7.1. Current remediation activities are underway on the west adjoining property and no further investigations have been recommended regarding the subject property. The project is in compliance with Executive Order 12898.

**Field Inspection** (Date and completed by): June 11, 2024, Joseph Hall, Environmental Investigations Group, LLC (EI)

**Summary of Findings and Conclusions:**

The subject property is located in a FEMA Special Flood Hazard Area and sustained substantial damage during Hurricane Ida in 2021. A Modified 8-Step Decision-Making Process and flood insurance are required to achieve compliance. The property owner should adhere to LBP and Asbestos O&M Plans following any completed renovations.

**Mitigation Measures and Conditions [40 CFR 1505.2(c)]**

Summarize below 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
Contamination & Toxic Substances	<i>Lead-based Paint</i> AEI recommends being provided with any previous lead inspection reports if available. In addition, AEI recommends the property owner adhere to the December 2024 LBP

	<p>Operations &amp; Maintenance (O&amp;M) Plan, prepared under a separate report cover, for on-going lead-based paint maintenance practices at the subject property. The O&amp;M Plan stipulates that the assessment, repair and maintenance of damaged painted surfaces be performed to protect the health and safety of the building occupants. More stringent local and State regulations may apply to LBP in association with building demolition/renovations and worker/occupant protection. It should be noted that construction activities that disturb materials or paints containing any amount of lead may be subject to certain requirements of the OSHA lead standard contained in 29 CFR 1910.1025 and 1926.62.</p> <p><i>Asbestos</i></p> <p>If the identified ACM is to be impacted by any proposed renovations, the Owner must retain services of a NJDOL licensed Asbestos Abatement Contractor to properly abate the identified interior ACM in accordance either with NJDCA Subchapter 8 requirements or using NJDOH approved non-friable work procedures. If any suspect materials are identified during demolition/renovation activities that were not previously sampled, they should be sampled by a licensed asbestos inspector and handled accordingly. In addition, AEI recommends the property owner adhere to the December 2024 Asbestos O&amp;M Plan, prepared under a separate report cover, that stipulates that the assessment, repair and maintenance of damaged materials be performed to protect the health and safety of the building occupants.</p>
Flood Insurance	<p>The subject property is located in a FEMA-designated Special Flood Hazard Area (SFHA); therefore, flood insurance is required. For loans, loan insurance or guarantees on structures or insurable property located in a FEMA-designated Special Flood Hazard Area, the amount of flood insurance coverage must at least equal the outstanding principal balance of the loan or the maximum limit of coverage made available under the NFIP, whichever is less. For grants and other non-loan forms of financial assistance, flood insurance coverage must be continued for the life of the building irrespective of the transfer of ownership. The amount of coverage must at least equal the total project cost or the maximum coverage limit of the NFIP, whichever is less.</p>
Floodplain Management	<p>As a result of the completed Modified 8-Step Process, the following actions will be implemented and/or maintained:</p> <ul style="list-style-type: none"> <li>• All new and renewal leases must contain acknowledgements signed by the residents indicating that they have been advised that the property is in a</li> </ul>

	<p>floodplain and the Evacuation Plan should be provided to residents.</p> <ul style="list-style-type: none"> <li>• Flood insurance will be maintained for subject property structure.</li> </ul>
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**Determination:**

- This categorically excluded activity/project converts to Exempt, per 58.34(a)(12) because there are no circumstances which require compliance with any of the federal laws and authorities cited at §58.5. **Funds may be committed and drawn down after certification of this part** for this (now) EXEMPT project; OR
- This categorically excluded activity/project cannot convert to Exempt because there are circumstances which require compliance with one or more federal laws and authorities cited at §58.5. Complete consultation/mitigation protocol requirements, **publish NOI/RROF and obtain "Authority to Use Grant Funds"** (HUD 7015.16) per Section 58.70 and 58.71 before committing or drawing down any funds; OR
- This project is now subject to a full Environmental Assessment according to Part 58 Subpart E due to extraordinary circumstances (Section 58.35(c)).

Preparer Signature: Mary-Margaret Garcia Date: January 16, 2025

Name/Title/Organization: Mary-Margaret Garcia, Project Manager, AEI Consultants

Responsible Entity Agency Official Signature:

Frantz Volcy Date: 1/27/25

Name/Title: Frantz Volcy, P.E., City Engineer

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