

**NOTICE OF FINDING OF NO SIGNIFICANT IMPACT AND  
NOTICE OF INTENT TO REQUEST RELEASE OF FUNDS  
COMBINED NOTICE**

July 28, 2025  
City of Evanston  
City Hall  
909 Davis Street  
Evanston, IL 60201  
847-859-7889

To All Interested Persons, Agencies, and Groups:

**These notices shall satisfy two separate but related procedural requirements for activities to be undertaken by the City of Evanston.**

REQUEST FOR RELEASE OF FUNDS

On or about August 16, 2025, the City of Evanston will submit a request to the Illinois Department of Commerce & Economic Opportunity (DCEO) for the release of Community Development Block Grant - Coronavirus Program: Shelter Construction funds under Coronavirus Aid, Relief, and Economic Security (CARES) Act (2020), as amended, and to the U.S. Department of Housing and Urban Development (HUD) for the release of Economic Development Initiative (EDI) funds under Community Project Funding (CPF) Congressionally Directed Spending made available under the Consolidated Appropriations Act, 2023 (Public Law 117-328) (the FY2023 Act), as amended. Both requests will be used to undertake a project known as: Homeless Shelter Renovations: Connections for the Homeless, Inc., dba Hilda's Place, for the purpose of restoring and relaunching homeless shelter operations at Hilda's Place (607 Lake Street, Evanston) and to increase capacity of shelter beds from 18 to 30 non-congregate beds to prevent, prepare for and respond to coronavirus. Estimated funding includes \$1,754,000, in CDBG-CV funding and \$1,292,428 in EDI funding.

FINDING OF NO SIGNIFICANT IMPACT

The City of Evanston has determined that the project will have no significant impact on the human environment. Therefore, an Environmental Impact Statement under the National Environmental Policy Act (NEPA) of 1969 is not required. Additional project information is contained in the Environmental Review Record (ERR) that may be viewed at <https://tinyurl.com/HildasPlaceERR> or a copy may be requested by email: [jwingader@cityofevanston.org](mailto:jwingader@cityofevanston.org) or phone 847-859-7889. Printed copies of the ERR are available to view at City Hall (909 Davis Street, Evanston), the main branch of the Evanston Public Library (1703 Orrington Avenue, Evanston) and the Robert Crown library branch (1801 Main Street, Evanston). Printed copies will also be posted at the project location: Lake Street Church (607 Lake Street, Evanston) and at Connections for the Homeless (2121 Dewey Avenue, Evanston).

## PUBLIC COMMENT

Any individual, group, or agency may submit written comments on the ERR to the City of Evanston, Housing and Grants Division, 909 Davis Street, ATT: Jessica Wingader, Evanston, IL 60201 or to [jwingader@cityofevanston.org](mailto:jwingader@cityofevanston.org). All comments received by August 15, 2025, will be considered by the City of Evanston prior to authorizing submission of a Request for Release of Funds. Comments should specify which notice they are addressing.

## ENVIRONMENTAL CERTIFICATION

The City of Evanston certifies to DCEO and HUD that Mayor Daniel Biss, in his capacity as Mayor, consents to accept the jurisdiction of the Federal Courts if an action is brought to enforce responsibilities in relation to the environmental review process and that these responsibilities have been satisfied. HUD's approval of the certification satisfies its responsibilities under NEPA and related laws and authorities, and allows the City of Evanston, DECO, and HUD to use funds.

## OBJECTIONS TO RELEASE OF FUNDS

DCEO and HUD will accept objections to its release of funds and the City of Evanston's certification for a period of fifteen days following the anticipated submission date or its actual receipt of the request (whichever is later) only if they are on one of the following bases: (a) the certification was not executed by the Certifying Officer of the City of Evanston; (b) the City of Evanston has omitted a step or failed to make a decision or finding required by HUD regulations at 24 CFR Part 58; (c) the grant recipient has committed funds or incurred costs not authorized by 24 CFR Part 58 before approval of a release of funds by HUD; or (d) another Federal agency acting pursuant to 40 CFR Part 1504 has submitted a written finding that the project is unsatisfactory from the standpoint of environmental quality. Objections must be prepared and submitted in accordance with the required procedures (24 CFR Part 58, Sec. 58.76) and shall be addressed to: Illinois Department of Commerce & Economic Opportunity (DCEO), at 1011 S. 2nd St., Springfield, IL 62704, phone: 217-558-4106.

Potential objectors should contact DCEO or HUD to verify the actual last day of the objection period.

Daniel Biss, Mayor, City of Evanston



U.S. Department of Housing and Urban  
Development  
451 Seventh Street, SW  
Washington, DC 20410  
www.hud.gov/spanol.hud.gov

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

### **Project Information**

**Project Name:**

Homeless Shelter Renovations: Connections for the Homeless, Inc., dba Hilda's Place

**Responsible Entity:** City of Evanston

**Grant Recipient** (if different than Responsible Entity): Not applicable

**State/Local Identifier:**

20-301007

**Preparer:**

Jessica Wingader  
Sr. Grants & Compliance Specialist  
City of Evanston  
909 Davis Street  
Evanston, IL 60201  
(847) 859-7889

**Certifying Officer Name and Title:** **Daniel Biss, Mayor**

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

**Consultant** (if applicable):

Connections for the Homeless, Inc.

**Direct Comments to:**

**Jessica Wingader**  
**Sr. Grants & Compliance Specialist**  
**City of Evanston**  
**909 Davis St.**  
**Evanston, IL 60201**

**Project Location:**

The commercial property known as “Hilda’s Place,” located at 607 Lake Street in Evanston, Cook County, Illinois. The subject property also has the address of 1450 and 1458 Chicago Ave. Evanston, IL 60201-4768.

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

Project activities will include the rehabilitation of Connections for the Homeless’ shelter (Hilda’s Place), located in the lowest level of Lake Street Church. Construction activities will include:

- New one-story entry vestibule, stair, and concrete walkway at north end
- New 3-stop elevator, providing access to all floors
- Selective demo of existing interior partitions, ceilings, finishes, and lighting
- Demo existing toilet/shower rooms (including elevated slabs) and provide new Men’s, Women’s and two unisex toilet/shower rooms
- Lower existing slab 12” at “cage” area to create additional sleeping room
- Provide new congregate sleeping rooms for occupancy up to 30 beds
- Provide new lobby/reception and staff office areas
- Renovation of existing kitchen on first floor
- New mechanical ventilation
- New lighting throughout

Lake Street Church will continue ownership of the property; Connections for the Homeless, Inc. and Lake Street Church of Evanston are currently bound by a ten year lease which will expire in 2034 and includes two ten-year options to extend. The renovations will allow Connections for the Homeless to maintain operations as a day use center. This project will assure participants access to basic necessities such as: showers, free behavioral and physical healthcare, clothing, food, and case management.

Funding sources include a State Community Development Block Grant - Coronavirus Program (CDBG-CV): Shelter Construction grant provided by the Department of Commerce and Economic Opportunity (DCEO), Congressionally appropriated Community Project Funding (CPF) grant award administered by the Department of Housing and Urban Development, and private donations earmarked for construction.

This project should complete by or before April 2027.

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

Proposed activities under this application will allow Hilda’s Place to resume pre-pandemic homeless shelter activities and relaunch of shelter beds whilst expanding capacity from 18 to 30 year-round beds. The shelter will provide emergency and interim housing for individuals and families experiencing homelessness. This would help prevent and prepare for Coronavirus by ensuring access to healthcare and reducing the reliance on other shelter options located in rotating donated spaces staffed by volunteers. The proposed rehabilitation project construction activities will ensure a warm, safe and accessible fixed site shelter and day-use facility.

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

This project is being proposed to restore and relaunch homeless shelter operations at Hilda’s Place and to increase capacity from 18 to 30 non-congregate shelter beds to prevent, prepare for

and respond to coronavirus. The space currently operates as a day-time drop-in center; the shelter will provide emergency and interim housing for individuals and families experiencing homelessness. The site consists of a rectangular-shaped parcel that is approximately 0.46 acres. The subject property is zoned as a religious institution and features a congregate shelter and drop-in space developed in 1984, this is a permitted use as an accessory Transitional Shelter to the Religious Institution, Lake Street Church, which exists at the property in compliance with zoning requirements as a legally nonconforming use in the R4 District.

**Funding Information**

<b>DCEO Grant Number</b>	<b>HUD Program</b>	<b>Funding Amount</b>
20-301007	State CDBG-CV	\$ 1,754,000.00
<b>CFP Grant Number</b>	<b>HUD Program</b>	
B-23-CP-IL-0584	Economic Development Initiative (EDI)	\$ 1,292,428.00

**Estimated Total HUD Funded Amount (from State & Local HUD funds):  
\$3,046,428.00**

**Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d):  
\$3,046,428.00, Connections for the Homeless, Inc., with \$1,754,000 from State CDBG-CV,  
and \$1,292,428.00 from HUD EDI, all for shelter rehabilitation construction**

**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 and 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 5 miles of any airports. All supporting documentation, including a map showing the airports in the vicinity of the subject property, is included with this report as Appendix A.

<p><b>Coastal Barrier Resources</b></p> <p>Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p><i>Illinois is not a covered state under these Acts.</i></p>
<p><b>Flood Insurance</b></p> <p>Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The subject property is not located within a flood plain. FIRM #17031C0270J with project location marked is included to show the project is not located within a flood plain.</p> <p>An updated National Flood Hazard Layer FIRMette with project location marked is also provided; map shows that the project is located in an area of minimal flood hazard.</p> <p>A third map from the IL Dept. of Natural Resources is also provided. The project location is marked and shows that the site is not located within a coastal zone.</p> <p>All supporting documentation, including a HUD flood insurance worksheet is included in Appendix B.</p>
<p><b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 &amp; 58.5</b></p>		
<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>The subject property is located in a commercial and residential area. The project is located in Cook County which is designated as a nonattainment area for 8-hour ozone. Average Evanston air quality reports Good as evidenced by the <a href="http://AirNow.gov">AirNow.gov</a> air quality index and defined by the Air Quality Guide for Ozone, both included with this report. See attached National by State and Illinois by County US EPA Non-Attainment Areas lists.</p> <p>The project's IEPA clearance letter states that no objections are cited and no permits are required from IEPA Bureau of Air. To minimize impact on air quality, Contractors will agree to use low VOC paints and chemicals and will use battery and electric</p>

		<p>powered equipment when reasonably possible.</p> <p>All supporting documentation, including a HUD air quality worksheet, is included in Appendix C.</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>The subject property is not located within a coastal zone boundary. The subject property is located approximately 1,000 feet west of the nearest coastal zone boundary. The Coastal Zone Boundary Map, and all supporting documentation, is included as Appendix D.</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>Environmental Consulting Group, Inc., conducted the Phase 1 ESA and found no recognized environmental conditions (RECs); the report's conclusion is included to justify results of this compliance determination. A HUD contamination and Toxic Substances worksheet is also included. Phase 1 also found no underground storage tanks (USTs) at the site and the EPA database identifying Leaking Underground Storage Tanks lists no tanks for the project site.</p> <p>The EPA EnviroMapper and US EPA NEPAssist mapping tool show that there are no hazardous waste or air pollutants on the same block as the project site. The subject property is not located on filled land. There are no dumps, landfills, or industrial sites that may contain hazardous waste adjacent to the subject property.</p> <p>The database summary table using Federal and State records identify the explosive and flammable hazards near the project site, as shown on the EPA NEPAssist map, and document that none represent an REC.</p> <p>Per IEPA requirements, an asbestos inspection will occur prior to construction and an IEPA project demolition form and fee with 10 working day notice will be</p>

		<p>submitted for removal of load bearing structures.</p> <p>A Radon Survey Summary Report for the project site conducted by Carnow, Conibear, &amp; Assoc., Ltd. found that radon measurement results were below the EPA and IEMA recommended action level of 4.0 pCi/L.</p> <p>All supporting documentation is included as Appendix E.</p>
<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 species list identifying threatened, endangered, proposed, and candidate species, provided by the Chicago Ecological Service Field Office of the U.S. Fish and Wildlife Service, there are 7 species identified; however, the letter also states that the project location does not overlap the critical habitats for any of the species identified. The letter further documents that there are no critical habitats within the project area under the office's jurisdiction. No effect on Federally-listed species due to interior renovation construction.</p> <p>According to the Illinois Department of Natural Resources Ecological Compliance Assessment Tool (EcoCAT) the Illinois Natural Heritage Database contains no record of State-listed threatened or endangered species in the project area. There are 142 endangered/threatened species in Cook County, but none are present at the project site.</p> <p>ECG performed an inspection of the property and confirmed that none of the species identified are on or near the subject property.</p> <p>All support documentation found under Appendix F.</p>
<p><b>Explosive and Flammable Hazards</b></p>	<p>Yes    No</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>The subject property is not located on or near an area where hazardous gases (e.g. liquid propane), chemicals of a flammable</p>

<p>24 CFR Part 51 Subpart C</p>		<p>nature (e.g. benzene, hexane), or any other potentially hazardous materials are stored in a structure. According to the Phase I ESA, the site is not located adjacent to any SEMS sites.</p> <p>The proposed project does not include a hazardous facility, and will not increase residential densities, or conversion.</p> <p>According to the Illinois EPA Leaking Underground Storage Tank (LUST) database, the subject property is not listed on the LUST database.</p> <p>The NEPAAssist mapper indicated that there are no RCRA or SEMS sites at or adjacent to the subject property. Copies of the RCRA and SEMS maps are provided.</p> <p>All support documentation is included in Appendix G.</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  <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The subject property is not farmland. The subject property has been developed since the 1880s and is located in downtown Evanston.</p> <p>The Illinois Department of Agriculture, Bureau of Land and Water Resources sent a determination letter dated May 8 2025, which confirms that the project will not affect agricultural land. The original letter and all support documentation is included in Appendix H.</p>
<p><b>Floodplain Management</b></p> <p>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p>Yes No  <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>As shown by the Flood Insurance Rate Map (FIRM) 17031C0266K for Cook County, Illinois, obtained on the Federal Emergency Management Agency (FEMA) website. The site is located in a Zone X “Area of Minimal Flood Hazard.” The site is not located in a 100-year floodplain. The FEMA Flood Insurance Rate Map (FIRM) printout is also provided.</p>
<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  <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The SHPO at the Illinois Department of Natural Resources (IDNR) reviewed the project site and confirmed that Lake Street Church of Evanston Parish House is a contributing structure to the Evanston Lakeshore Historic District and is listed on</p>

		the National Register of Historic Places (NRHP); however, no historic archaeological properties are known to exist within the project. IDNR further determined that the scope of work required to complete the project will not adversely affect the NRHP contributing building or surrounding NRHP Evanston Lakeshore Historic District. SHPO Section 106 clearance letter dated 06/16/2025. HUD TDAT Tribal Consultation Checklist.
<p><b>Noise Abatement and Control</b></p> <p>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>According to a Phase I Environmental Site Assessment Report conducted by Environmental Consulting Group, Inc. (ECG) on May 20, 2025, the subject property is not located within 1,000 of a major highway, within 15 miles of a military airport or within 5 miles of a civil airport. A Union Pacific Railway railroad and Metra Commuter railroad are located approximately 400 feet west of the subject property. No excessive noise levels were noted during ECG's site inspection. ECG completed a noise assessment according to HUD regulations and using the electronic Site DNL Calculator. The maximum calculated noise level for the subject property is approximately 58 db. This level is within the acceptable levels as defined by HUD. All support documentation is included in Appendix K.</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</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>Based on the US EPA Region V, Designated Sole Source Aquifers map provided, the only aquifer in Illinois is the Mahomet Aquifer which is over 150 miles from the project site. Support documentation is included in Appendix L.</p>
<p><b>Wetlands Protection</b></p> <p>Executive Order 11990, particularly sections 2 and 5</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>USF+WS Wetlands Mapper has no wetlands at or near the project's location.</p> <p>The IDNR review using the Ecological Compliance Assessment Tool EcoCat is included with additional support documentation in Appendix M.</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</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>According to the National Wild and Scenic Rivers System (NWSRS), there are no scenic rivers in Cook County. The only scenic river in Illinois is the Vermillion River, which is located over 110 miles from the site. The project is not within proximity of a NWSRS river and is in compliance with the Wild and Scenic Rivers Act.</p>
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**Environmental Assessment Factors** [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features, and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable, and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. **All conditions, attenuation or mitigation measures have been clearly identified.**

**Impact Codes:** Use an impact code from the following list to make the determination of impact for each factor.

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

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>LAND DEVELOPMENT</b>		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	1	The property at 607 Lake Street/1458 Chicago Avenue will feature a year-round 30-bed congregate shelter and drop-in space, which is a permitted use as an accessory Transitional Shelter to the Religious Institution, Lake Street Church, which exists at the property in compliance with zoning requirements as a legally nonconforming use in the R4 District.
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	The proposed scope of work involves renovation of the two-story building on the subject property. The site is relatively flat. According to the USDA’s Web Soil Survey, the subject property is located on “Urban Land.” The project is already

		developed as a two story building and surrounding land is urban with portions covered by asphalt and concrete; the project will have no major impact on erosion, drainage, or storm water runoff. The project will not create or contribute runoff water that would exceed the capacity of existing or planned storm drainage systems or provide substantial additional sources of polluted runoff. The storm water system is maintained by the City of Evanston.
Hazards and Nuisances including Site Safety and Noise	2	There are no hazards or nuisances that would impact the subject property. There are no natural hazards located on or adjacent to the subject property, such as steep slopes, geologic faults or hazardous terrain features. According to the US Geological Survey (USGS), the subject property is located in a hazard area of 0.4-0.8 (g) in the US Seismic Hazard 2% in 50 years PGA. A copy of the Illinois Seismic Hazard Map is provided.  There are no coal mines on the subject property or adjacent to the subject property. A copy of the coal mine map is provided.

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>SOCIOECONOMIC</b>		
Employment and Income Patterns	1	Mechanics and Laborers will be employed to perform construction work.
Demographic Character Changes, Displacement	1	The project will provide a benefit to the demographics of the area, giving a place for the unhoused in downtown Evanston a place to stay overnight. The project will not result in physical barriers that would isolate a neighborhood or group; the project will not impact access to local services, facilities amenities or institutions. The project site is not currently operating as a shelter; no households will be displaced during construction.

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>COMMUNITY FACILITIES AND SERVICES</b>		
Educational and Cultural Facilities	2	No impacts expected.
Commercial Facilities	2	No impacts expected. The subject property is located within the downtown district of the City of Evanston. There are numerous commercial and retail establishments within walking distance of the subject property.

Health Care and Social Services	1	This project will be an improvement to Health Care and Social services since people who stay at the shelter will have access to case management and health services. There are several health care providers and hospitals near the subject property and within the City of Evanston. Evanston Hospital is located approximately 1.4 miles to the north and St. Francis Hospital is located 1.3 miles to the south of the subject property.
Solid Waste Disposal / Recycling	2	There is no impact on solid waste disposal or recycling expected; this location is already serviced for trash and recycling needs. The City of Evanston offers residents refuse and recycling service through Lakeshore Recycling Services. The City also provides information on hazardous waste, lawn & garden waste programs, such as brush pick-up, leaf pick-up, and a brush drop-off site.
Waste Water / Sanitary Sewers	2	There is no anticipated impact as the project site already receives services. Sanitary services are provided by the City of Evanston through the Metropolitan Water Reclamation District of Greater Chicago (MWRD). The MWRD has a wastewater treatment facility (MWRD North Side Treatment Plant) located on the southwest part of Evanston. The project will not be adversely affected by proximity to facilities.
Water Supply	2	No impact expected. The water supply is provided by the City of Evanston. The City obtains its water from Lake Michigan. The project will not be adversely affected by proximity to facilities. The project will not have any impact on the water supply.
Public Safety - Police, Fire and Emergency Medical	2	<p>No impact expected. The site is served by the City of Evanston Police Department. Four City of Evanston Police Department stations are located within 1.7 miles of the subject property. The nearest police station is located approximately 0.15 miles west of the subject property. There are no existing obstacles that would prohibit an emergency situation. The design of the property does not create obstacles or isolated areas.</p> <p>Fire Services are handled by the Evanston Fire Department. The City of Evanston has seven fire stations, and are located within 2.2 miles of the site. The nearest fire station is located approximately 0.15 miles west of the subject property.</p> <p>There are several health care providers and hospitals near the subject property and within the City of Evanston. Evanston Hospital is located approximately 1.4 miles to</p>

		the north and St. Francis Hospital is located 1.3 miles to the south of the subject property. Additionally, a dialysis Center, immediate health care clinic, and a mental health facility are located within 0.7 miles of the subject property.
Parks, Open Space and Recreation	2	No impact expected. The Evanston Park District manages the City's parks, playgrounds, beaches, and community gardens. The subject property is located approximately .057 mi from Raymond Park; the project will not adversely affect park access or park space.
Transportation and Accessibility	2	No impact expected. The subject property is not located within 1,000 feet of a major highway. The subject property is not located within 5 miles of a civil airport or within 15 miles of a military airport. The subject property is located approximately 11 miles northeast of Chicago O'Hare International Airport and 11 miles southeast of Chicago Executive Airport. Chicago Midway International Airport is located approximately 18 miles south of the subject property.  The subject property is located within two blocks of multiple Pace bus routes. A Union Pacific Railway railroad and Metra Commuter railroad are located approximately 400 feet west of the subject property.

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>NATURAL FEATURES</b>		
Unique Natural Features, Water Resources	2	No impacts expected. There are no unique natural features on the subject property because the subject property is currently developed with a two-story building. The subject property will not affect any unique natural features or resource extraction on or near the subject property. The subject property will not destroy or isolate nearby unique natural features from public or scientific access. As previously stated, Lake Michigan is located approximately 0.45 miles east of the subject property, North Shore Channel is located approximately 1.5 miles west of the subject property.  According to the National Wild and Scenic Rivers System, there are no scenic rivers in Cook County. The only scenic river in Illinois is the Vermillion River, which is located over 110 miles south of the subject property.

Vegetation, Wildlife	2	No impacts expected. The subject property is currently developed with a two story building. There are no existing wildlife habitats on the subject property or adjacent to the subject property. The rehabilitation of the subject property will not threaten any animal species listed as endangered or threatened. There are no game fish habitats or spawning grounds on the subject property or adjacent to the subject property. The rehabilitation of the subject property will not create conditions favorable to the proliferation of pest species.
Other Factors	2	No other factors present.

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>ENERGY</b>		
Energy Efficiency	1	The project will provide energy efficiency improvements to lighting, plumbing and HVAC. Lighting: project will replace existing lighting with new LED fixtures in all renovated spaces and install new lighting controls that meet IECC 2018 Energy Code. Plumbing: project will replace all existing toilet/shower room fixtures with low flow and water saver fixtures, provide new low flow and water saver fixtures to new toilet/shower rooms. HVAC: project will provide two high-efficiency condensing furnaces with ECM motor, 80-120 MBH input, with DX cooling coil, and outdoor condensing ETL listed. Project will also include new dedicated exhaust fans, associated exhaust duct work, and grilles to serve all toilet/shower rooms. Exhaust fans will be Energy Star Rated.

**Additional Studies Performed:**

The following reports performed by Environmental Consulting Group, Inc.:

- Phase 1 Environmental Site Assessment Report
- Annual Water Quality Report
- Hazardous Materials Report
- Asbestos and Lead-Based Paint Materials Testing Services Report
- Asbestos Abatement Project Manual

The Vapor Encroachment Screen Report conducted by Environmental Data Resources Inc.

**Field Inspection (Date and completed by):**

The site inspection for the Phase 1 report, prepared by Environmental Consulting Group, Inc., was completed on May 5, 2025, and was conducted by Thomas Culig. Cade Sterling, the City's Preservation Planner, visited the site on April 24, 2025,

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

Airports	Chicago Department of Aviation, Chicago Executive Airport, O'Hare International Airport, Chicago Midway International Airport
Flood Insurance	National Flood Insurance Program, Federal Emergency Management Agency (FEMA), Illinois Coastal Management Program
Clean Air	Illinois Environmental Protection Agency (IEPA), Thomas Culig and Robert Johnson of Environmental Consulting Group, Inc., referred to as ECG (also performed the Phase 1 report for the project)
Contamination & Toxic Substances	Carnow, Conibear, & Associates, LTD (for radon), United States Environmental Protection Agency (EPA) - EnviroMapper and Multisystem Search, ECG Phase 1 report, USDA Natural Resources Conservation Services (Soil Survey)
Endangered Species	Illinois Natural Heritage Database, United States Department of the Interior Fish and Wildlife Services
Explosive & Flammable	United States Environmental Protection Agency (EPA) - EnviroMapper
Farmlands Protection	Michelle Curby, Chief: Illinois Department of Agriculture (IDNR) - Bureau of Land and Water Resources
Floodplain Management	FEMA: National Flood Insurance Program and National Flood Hazard Layer FIRMette
Historic Preservation	Cade Sterling, Preservation Planner for City of Evanston, Carey L. Mayer, Deputy State Historic Preservation Officer, Illinois Department of Natural Resources (IDNR), Deborah Kasindorf and Kris Hartzell of Evanston History Center, Phillip Peters, Historic Preservation Specialist, Gun Lake Tribe - Tribal Historic Preservation Office (Match-E-Be-Nash-She-Wish band of Pottawatomi Indians). Tribal Directory Assessment Information contacts for Tribes with Interests in Cook County including: Tracy Wind of the Citizen Potawatomi Nation, Raphael Wahwassuck of the Prairie Band Potawatomi Nation, the Miami Tribe of Oklahoma, the Menominee Indian Tribe of Wisconsin, the Little Traverse Bay Bands of Odawa Indians
Noise Abatement & Control	Thomas Culig and Robert Johnson of ECG

Wetlands Protection	Isabella Newingham, IDNR contact, Division of Ecosystems & Environment
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**List of Permits Obtained:**

None at this time

**Public Outreach [24 CFR 50.23 & 58.43]:**

The public comment period for the Illinois Department of Commerce & Economic Opportunity’s Community Development Block Grant - Coronavirus Urban Shelter program was open from June 28, 2024 through July 8, 2024, and was closed at the public meeting of Evanston’s City Council. The application package was available online and in hard copy at the Evanston Public Library and the Robert Crown Community Center.

**Cumulative Impact Analysis [24 CFR 58.32]:**

The cumulative impact will include rehabilitation of toilet/shower rooms, congregate sleeping rooms for occupancy of up to 30 beds, mechanical ventilation, upgraded lighting, and a new 3-stop elevator to provide access to all floors. The project site known as “Hilda’s Place,” operates as a day shelter offering access to case management, free behavioral and physical healthcare, clothing, food and showers to people experiencing homelessness.

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

No other alternative sites were considered as this site has been operating as a day shelter space for 35 years.

**No Action Alternative [24 CFR 58.40(e)]:**

The space is not currently operating as a shelter. To perform no action would mean that the 30 proposed shelter beds would not be created. Additionally, if the elevator is not rehabilitated, people with mobility challenges would not be able to access case management and basic needs services located on additional floors.

**Summary of Findings and Conclusions:**

**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
Illinois Environmental Protection Agency	<i>Asbestos inspection and demolition notification form and fee within 10 working day notice.</i>


**Determination:**

**Finding of No Significant Impact** [24 CFR 58.40(g)(1); 40 CFR 1508.27]  
 The project will not result in a significant impact on the quality of the human environment.

**Finding of Significant Impact** [24 CFR 58.40(g)(2); 40 CFR 1508.27]  
 The project may significantly affect the quality of the human environment.

Preparer Signature: X           *Jessica Wingader*           Date: 7/16/2025

Note: Must be dated same day or earlier than Chief Elected Official's signature below.

Name/Title/Organization: Jessica Wingader, Sr. Grants & Compliance Specialist

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Certifying Officer Signature (i.e., Chief Elected Official; may be signed as and initialed by designee of Chief Elected Official for City of Chicago or County of Cook or Lake Govts Only):

X *Daniel Biss* Date: 07 / 18 / 2025

Name/Title: Daniel Biss, Mayor

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).

Title	Urban Shelter Grant award - Connection for the Homeless
File name	EA-ER-Format_for_CDBG-CV_SC.pdf and 1 other
Document ID	0bee9318d51c45e753ca5c2729346164a64cfa29
Audit trail date format	MM / DD / YYYY
Status	● Signed

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## Document History



SENT

**07 / 17 / 2025**

08:23:26 UTC-5

Sent for signature to Daniel Biss (dbiss@cityofevanston.org) from lthomas@cityofevanston.org  
IP: 66.158.65.78



VIEWED

**07 / 18 / 2025**

14:09:59 UTC-5

Viewed by Daniel Biss (dbiss@cityofevanston.org)  
IP: 207.229.149.67



SIGNED

**07 / 18 / 2025**

14:10:16 UTC-5

Signed by Daniel Biss (dbiss@cityofevanston.org)  
IP: 207.229.149.67



COMPLETED

**07 / 18 / 2025**

14:10:16 UTC-5

The document has been completed.

## Airport Hazards (CEST and EA)

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

References
<a href="https://www.hudexchange.info/environmental-review/airport-hazards">https://www.hudexchange.info/environmental-review/airport-hazards</a>

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

No  *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing that the site is not within the applicable distances to a military or civilian airport.*

Yes  *Continue to Question 2.*

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

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

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

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

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

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

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

**Explain how you determined that the project is consistent:**

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

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

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

**Explain approval process:**

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

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

### **Worksheet Summary**

#### **Compliance Determination**

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

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

No sale or acquisition of property will occur

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

Yes

No

## Flood Insurance (CEST and EA)

General requirements	Legislation	Regulation	Reference
Certain types of federal financial assistance may not be used in floodplains unless the community participates in National Flood Insurance Program and flood insurance is both obtained and maintained.	Flood Disaster Protection Act of 1973 as amended (42 USC 4001-4128)	24 CFR 50.4(b)(1) and 24 CFR 58.6(a) and (b); 24 CFR 55.5.	<a href="#">Flood Insurance - HUD Exchange</a>

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

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

*Continue to the Worksheet Summary.*

Yes *Continue to Question 2.*

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

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

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

No *Continue to the Worksheet Summary.*

Yes *Continue to Question 3.*

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

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

For loans, loan insurance or loan guarantees, flood insurance coverage must be continued for the term of the loan. For grants and other non-loan forms of financial assistance, flood insurance coverage must be continued for the life of the building irrespective of the transfer of ownership. The amount of coverage must equal the total project cost or the maximum coverage limit of the National Flood Insurance Program, whichever is less

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

*Continue to the Worksheet Summary.*

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

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

*Continue to the Worksheet Summary.*

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

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

### **Worksheet Summary**

#### **Compliance Determination**

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

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

According to the National Flood Hazard Layer FIRMette map for the location of the project, the project is not located in a flood hazard area. This information is further verified by the Flood Insurance Rate Map (FIRM) map that shows the flood zones for the project location in panel 270 of 832 for Cook County, Illinois. Both maps are included as evidence for the Flood Insurance section of the Environmental Review Report.

## Air Quality (CEST and EA)

General Requirements	Legislation	Regulation
The Clean Air Act is administered by the U.S. Environmental Protection Agency (EPA), which sets national standards on ambient pollutants. In addition, the Clean Air Act is administered by States, which must develop State Implementation Plans (SIPs) to regulate their state air quality. Projects funded by HUD must demonstrate that they conform to the appropriate SIP.	Clean Air Act (42 USC 7401 et seq.) as amended particularly Section 176(c) and (d) (42 USC 7506(c) and (d))	40 CFR Parts 6, 51 and 93
<b>Reference</b>		
<a href="https://www.hudexchange.info/environmental-review/air-quality">https://www.hudexchange.info/environmental-review/air-quality</a>		

### Scope of Work

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

Yes

Continue to Question 2.

No

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

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

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

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

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

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

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

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

Describe the findings:

*Continue to Question 3.*

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

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

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

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

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

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

#### **Worksheet Summary**

##### **Compliance Determination**

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

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

This rehabilitation project is in a commercial and residential area and will have minimal impact on air quality. To minimize or mitigate any impact on air quality, Contractors agree to use low VOC paints and chemicals and certify the use of battery and electric powered equipment when reasonably possible.

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

Yes

No

## Coastal Zone Management Act (CEST and EA)

General requirements	Legislation	Regulation
Federal assistance to applicant agencies for activities affecting any coastal use or resource is granted only when such activities are consistent with federally approved State Coastal Zone Management Act Plans.	Coastal Zone Management Act (16 USC 1451-1464), particularly section 307(c) and (d) (16 USC 1456(c) and (d))	15 CFR Part 930
References		
<a href="https://www.onecpd.info/environmental-review/coastal-zone-management">https://www.onecpd.info/environmental-review/coastal-zone-management</a>		

Projects located in the following states must complete this form.

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

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

Yes  *Continue to Question 2.*

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

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

Yes  *Continue to Question 3.*

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

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

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

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

No, project must be canceled.

Project cannot proceed at this location.

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

No mitigation plan necessary.

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

**Worksheet Summary**

**Compliance Determination**

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

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

This project does not impact lakeshore public land and is not located on or near a coastal zone as indicated by the FIRM map panel 270 of 832 with the project site circled in red. Illinois has two coastal zone components as identified by the Illinois Department of Natural Resources (full document included). The Lakeshore Boundary is based on the Lake Michigan watershed, generally parallel to the shoreline and the Inland Waterway Boundary which includes segments of the Chicago River system. The project is also not located near the North Shore Channel or the North Branch of the Chicago River as evidenced by the map.

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

Yes

No

## Contamination and Toxic Substances (Multifamily and Non-Residential Properties)

General requirements	Legislation	Regulations
It is HUD policy that all properties that are being proposed for use in HUD programs be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of the occupants or conflict with the intended utilization of the property.		24 CFR 58.5(i)(2) 24 CFR 50.3(i)
<b>Reference</b>		
<a href="https://www.hudexchange.info/programs/environmental-review/site-contamination">https://www.hudexchange.info/programs/environmental-review/site-contamination</a>		

**1. How was site contamination evaluated?<sup>1</sup> Select all that apply.**

- ASTM Phase I ESA
- ASTM Phase II ESA
- Remediation or clean-up plan
- ASTM Vapor Encroachment Screening
- None of the above

Provide documentation and reports and include an explanation of how site contamination was evaluated in the Worksheet Summary.

Continue to Question 2.

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

No

**Explain:**

According to a Phase I Environmental Site Assessment Report conducted by Environmental Consulting Group, Inc. (ECG) on May 20, 2025, there are no recognized environmental conditions, no controlled recognized environmental conditions, and no historical recognized environmental conditions; these terms are defined by the ASTM Standard E1527-21.

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<sup>1</sup> HUD regulations at 24 CFR § 58.5(i)(2)(ii) require that the environmental review for multifamily housing with five or more dwelling units or non-residential property include the evaluation of previous uses of the site or other evidence of contamination on or near the site. For acquisition and new construction of multifamily and nonresidential properties HUD strongly advises the review include an ASTM Phase I Environmental Site Assessment (ESA) to meet real estate transaction standards of due diligence and to help ensure compliance with HUD's toxic policy at 24 CFR §58.5(i) and 24 CFR §50.3(i). Also note that some HUD programs require an ASTM Phase I ESA.

Additionally, Carnow, Conibear, & Assoc., Ltd. (Carnow Conibear) was contracted by Connections for the Homeless to perform a radon measurement survey at the Connections for the Homeless - Hilda's Place located at 1458 Chicago Avenue in Evanston, Illinois. The survey was initiated on May 16, 2025 and completed on May 19, 2025 by Cares Bailey, an Illinois Emergency Management Agency (IEMA) licensed Radon Measurement Professional (License No. RNI20242699).

The scope of work included short-term (two to four day) radon measurements in frequently occupied rooms with substantial ground contact. The radon sampling was performed following IEMA and the United States Environmental Protection Agency (USEPA) testing protocols. Radon measurement results ranged from less than (<) 0.3 to 2.6 picoCuries per liter (pCi/L). The radon measurement results indicate areas tested were below the EPA and IEMA recommended action level of 4.0 pCi/L during the time of the test. The average indoor radon concentrations are 1.3 pCi/L nationwide. The average outdoor radon concentration is 0.4 pCi/L.

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

Yes.

*Describe the findings, including any recognized environmental conditions (RECs), in Worksheet Summary below. Continue to Question 3.*

### **3. Mitigation**

Document the mitigation needed according to the requirements of the appropriate federal, state, tribal, or local oversight agency. If the adverse environmental effects cannot be mitigated, then HUD assistance may not be used for the project at this site.

#### **Can adverse environmental impacts be mitigated?**

Adverse environmental impacts cannot feasibly be mitigated

Project cannot proceed at this location.

Yes, adverse environmental impacts can be eliminated through mitigation.

*Provide all mitigation requirements<sup>2</sup> and documents. Continue to Question 4.*

---

<sup>2</sup> Mitigation requirements include all clean-up actions required by applicable federal, state, tribal, or local law. Additionally, provide, as applicable, the long-term operations and maintenance plan, Remedial Action Work Plan, and other equivalent documents.

4. Describe how compliance was achieved. Include any of the following that apply: State Voluntary Clean-up Program, a No Further Action letter, use of engineering controls<sup>3</sup>, or use of institutional controls<sup>4</sup>.

If a remediation plan or clean-up program was necessary, which standard does it follow?

- Complete removal
  - Continue to the Worksheet Summary.*
- Risk-based corrective action (RBCA)
  - Continue to the Worksheet Summary.*

### **Worksheet Summary**

#### **Compliance Determination**

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

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

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<sup>3</sup> Engineering controls are any physical mechanism used to contain or stabilize contamination or ensure the effectiveness of a remedial action. Engineering controls may include, without limitation, caps, covers, dikes, trenches, leachate collection systems, signs, fences, physical access controls, ground water monitoring systems and ground water containment systems including, without limitation, slurry walls and ground water pumping systems.

<sup>4</sup> Institutional controls are mechanisms used to limit human activities at or near a contaminated site, or to ensure the effectiveness of the remedial action over time, when contaminants remain at a site at levels above the applicable remediation standard which would allow for unrestricted use of the property. Institutional controls may include structure, land, and natural resource use restrictions, well restriction areas, classification exception areas, deed notices, and declarations of environmental restrictions.

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

Yes

No

## Contamination and Toxic Substances (Multifamily and Non-Residential Properties)

General requirements	Legislation	Regulations
It is HUD policy that all properties that are being proposed for use in HUD programs be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of the occupants or conflict with the intended utilization of the property.		24 CFR 58.5(i)(2) 24 CFR 50.3(i)
<b>Reference</b>		
<a href="https://www.hudexchange.info/programs/environmental-review/site-contamination">https://www.hudexchange.info/programs/environmental-review/site-contamination</a>		

**1. How was site contamination evaluated?<sup>1</sup> Select all that apply.**

- ASTM Phase I ESA
- ASTM Phase II ESA
- Remediation or clean-up plan
- ASTM Vapor Encroachment Screening
- None of the above

Provide documentation and reports and include an explanation of how site contamination was evaluated in the Worksheet Summary.

Continue to Question 2.

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

No

**Explain:**

According to a Phase I Environmental Site Assessment Report conducted by Environmental Consulting Group, Inc. (ECG) on May 20, 2025, there are no recognized environmental conditions, no controlled recognized environmental conditions, and no historical recognized environmental conditions; these terms are defined by the ASTM Standard E1527-21.

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<sup>1</sup> HUD regulations at 24 CFR § 58.5(i)(2)(ii) require that the environmental review for multifamily housing with five or more dwelling units or non-residential property include the evaluation of previous uses of the site or other evidence of contamination on or near the site. For acquisition and new construction of multifamily and nonresidential properties HUD strongly advises the review include an ASTM Phase I Environmental Site Assessment (ESA) to meet real estate transaction standards of due diligence and to help ensure compliance with HUD's toxic policy at 24 CFR §58.5(i) and 24 CFR §50.3(i). Also note that some HUD programs require an ASTM Phase I ESA.

Additionally, Carnow, Conibear, & Assoc., Ltd. (Carnow Conibear) was contracted by Connections for the Homeless to perform a radon measurement survey at the Connections for the Homeless - Hilda's Place located at 1458 Chicago Avenue in Evanston, Illinois. The survey was initiated on May 16, 2025 and completed on May 19, 2025 by Cares Bailey, an Illinois Emergency Management Agency (IEMA) licensed Radon Measurement Professional (License No. RNI20242699).

The scope of work included short-term (two to four day) radon measurements in frequently occupied rooms with substantial ground contact. The radon sampling was performed following IEMA and the United States Environmental Protection Agency (USEPA) testing protocols. Radon measurement results ranged from less than (<) 0.3 to 2.6 picoCuries per liter (pCi/L). The radon measurement results indicate areas tested were below the EPA and IEMA recommended action level of 4.0 pCi/L during the time of the test. The average indoor radon concentrations are 1.3 pCi/L nationwide. The average outdoor radon concentration is 0.4 pCi/L.

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

Yes.

*Describe the findings, including any recognized environmental conditions (RECs), in Worksheet Summary below. Continue to Question 3.*

### **3. Mitigation**

Document the mitigation needed according to the requirements of the appropriate federal, state, tribal, or local oversight agency. If the adverse environmental effects cannot be mitigated, then HUD assistance may not be used for the project at this site.

#### **Can adverse environmental impacts be mitigated?**

Adverse environmental impacts cannot feasibly be mitigated

Project cannot proceed at this location.

Yes, adverse environmental impacts can be eliminated through mitigation.

*Provide all mitigation requirements<sup>2</sup> and documents. Continue to Question 4.*

---

<sup>2</sup> Mitigation requirements include all clean-up actions required by applicable federal, state, tribal, or local law. Additionally, provide, as applicable, the long-term operations and maintenance plan, Remedial Action Work Plan, and other equivalent documents.

4. Describe how compliance was achieved. Include any of the following that apply: State Voluntary Clean-up Program, a No Further Action letter, use of engineering controls<sup>3</sup>, or use of institutional controls<sup>4</sup>.

If a remediation plan or clean-up program was necessary, which standard does it follow?

- Complete removal
  - Continue to the Worksheet Summary.*
- Risk-based corrective action (RBCA)
  - Continue to the Worksheet Summary.*

### **Worksheet Summary**

#### **Compliance Determination**

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

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

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<sup>3</sup> Engineering controls are any physical mechanism used to contain or stabilize contamination or ensure the effectiveness of a remedial action. Engineering controls may include, without limitation, caps, covers, dikes, trenches, leachate collection systems, signs, fences, physical access controls, ground water monitoring systems and ground water containment systems including, without limitation, slurry walls and ground water pumping systems.

<sup>4</sup> Institutional controls are mechanisms used to limit human activities at or near a contaminated site, or to ensure the effectiveness of the remedial action over time, when contaminants remain at a site at levels above the applicable remediation standard which would allow for unrestricted use of the property. Institutional controls may include structure, land, and natural resource use restrictions, well restriction areas, classification exception areas, deed notices, and declarations of environmental restrictions.

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

Yes

No

## 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/endorangered-species">https://www.hudexchange.info/environmental-review/endorangered-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:

According to the Illinois Department of Natural Resources Ecological Compliance Assessment Tool (EcoCAT) the Illinois Natural Heritage Database contains no record of State-listed threatened or endangered species in the project area. There are 142 endangered/threatened species in Cook County, but none are present at the project site. Finally, the majority of the project consists of interior rehabilitation.

## 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 Illinois Natural Heritage Database contains no record of State-listed threatened or endangered species, Illinois Natural Area Inventory sites, dedicated Illinois Nature Preserves, or registered Land and Water Reserves in the vicinity of the project location.

### Are formal compliance steps or mitigation required?

Yes

X 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. Does the proposed HUD-assisted project include 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:**

Continue 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:**

- Of more than 100 gallon capacity, containing common liquid industrial fuels OR
- Of any capacity, containing hazardous liquids or gases that are not common liquid industrial fuels?

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. Is the Separation Distance from the project acceptable based on standards in the Regulation?**

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 any tanks and your separation distance calculations. If the map identifies more than one tank, please identify the tank you have chosen as the "assessed tank."*

No

*Provide map(s) showing the location of the project site relative to any tanks and your separation distance calculations. If the map identifies more than one tank, please identify the tank you have chosen as the "assessed tank." Continue 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. Explain in detail the exact measures that must be implemented to make the Separation Distance acceptable, including the timeline for implementation. 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

EnviroMapper including Toxics Release Inventory with no toxins identified.

Phase 1 Environmental Site Assessment (ESA) prepared by Environmental Consulting Group, Inc., revealed no above ground storage tanks. The report documents that the subject property is not located on or near an area where hazardous gases, flammable chemicals, or any other potentially hazardous materials are stored in a structure. Additionally, the subject property is not listed on the Leaking Underground Storage Tank (LUST) database. Finally, the NEPAassist mapper indicates that there are no RCRA (Resource Conservation & Recovery Act) or SEMS (Superfund Enterprise) sites at or adjacent to the subject property.

**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 is located in an urban area. The Illinois Department of Agriculture (IDOA) reviewed the project and determined that it would have no impact to agricultural land.

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 Illinois Department of Agriculture, Bureau of Land and Water Resources sent a determination letter dated May 8 2025, which confirms that the project will not affect agricultural land. The original letter will remain in the project file.

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

Yes

No

## Floodplain Management (CEST and EA)

General Requirements	Legislation	Regulation
Executive Order 11988, Floodplain Management, requires Federal activities to avoid impacts to floodplains and to avoid direct and indirect support of floodplain development to the extent practicable.	Executive Order 11988	24 CFR 55
<b>Reference</b> <a href="https://www.hudexchange.info/environmental-review/floodplain-management">https://www.hudexchange.info/environmental-review/floodplain-management</a>		

1. Does [24 CFR 55.12\(c\)](#) exempt this project from compliance with HUD's floodplain management regulations in Part 55?

Yes

Provide the applicable citation at 24 CFR 55.12(c) here. If project is exempt under 55.12(c)(7) or (8), provide supporting documentation.

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

No  *Continue to Question 2.*

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

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

**Does your project occur in a floodplain?**

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

Yes

**Select the applicable floodplain using the FEMA map or the best available information:**

Floodway  *Continue to Question 3, Floodways*

Coastal High Hazard Area (V Zone)  *Continue to Question 4, Coastal High Hazard Areas*

- 500-year floodplain (B Zone or shaded X Zone)  *Continue to Question 5, 500-year Floodplains*
- 100-year floodplain (A Zone)  *The 8-Step Process is required. Continue to Question 6, 8-Step Process*

### **3. Floodways**

#### **Is this a functionally dependent use?**

- Yes

The 8-Step Process is required. Work with your HUD FEO to determine a way to satisfactorily continue with this project. Provide a completed 8-Step Process, including the early public notice and the final notice.

- Continue to Question 6, 8-Step Process*

- No

Federal assistance may not be used at this location unless a 55.12(c) exception applies. You must either choose an alternate site or cancel the project at this location.

### **4. Coastal High Hazard Area**

#### **Is this a critical action?**

- Yes

Critical actions are prohibited in coastal high hazard areas. Federal assistance may not be used at this location. Unless the action is excepted at 24 CFR 55.12(c), you must either choose an alternate site or cancel the project.

- No

**Does this action include construction that is not a functionally dependent use, existing construction (including improvements), or reconstruction following destruction caused by a disaster?**

- Yes, there is new construction.

New construction is prohibited in V Zones ((24 CFR 55.1(c)(3)).

- No, this action concerns only a functionally dependent use, existing construction(including improvements), or reconstruction following destruction caused by a disaster.

This construction must have met FEMA elevation and construction standards for a coastal high hazard area or other standards applicable at the time of construction.

- Continue to Question 6, 8-Step Process*

### **5. 500-year Floodplain**

**Is this a critical action?**

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

Yes  *Continue to Question 6, 8-Step Process*

**6. 8-Step Process.**

**Does the 8-Step Process apply? Select one of the following options:**

8-Step Process applies.

Provide a completed 8-Step Process, including the early public notice and the final notice.

*Continue to Question 7, Mitigation*

5-Step Process is applicable per 55.12(a)(1-3).

Provide documentation of 5-Step Process.

Select the applicable citation:

*55.12(a)(1)* HUD actions involving the disposition of HUD-acquired multifamily housing projects or “bulk sales” of HUD-acquired one- to four-family properties in communities that are in the Regular Program of the National Flood Insurance Program (NFIP) and in good standing (i.e., not suspended from program eligibility or placed on probation under 44 CFR 59.24).

*55.12(a)(2)* HUD's actions under the National Housing Act (12 U.S.C. 1701) for the purchase or refinancing of existing multifamily housing projects, hospitals, nursing homes, assisted living facilities, board and care facilities, and intermediate care facilities, in communities that are in good standing under the NFIP.

*55.12(a)(3)* HUD's or the recipient's actions under any HUD program involving the repair, rehabilitation, modernization, weatherization, or improvement of existing multifamily housing projects, hospitals, nursing homes, assisted living facilities, board and care facilities, intermediate care facilities, and one- to four-family properties, in communities that are in the Regular Program of the National Flood Insurance Program (NFIP) and are in good standing, provided that the number of units is not increased more than 20 percent, the action does not involve a conversion from nonresidential to residential land use, the action does not meet the thresholds for “substantial improvement” under § 55.2(b)(10), and the footprint of the structure and paved areas is not significantly increased.

*55.12(a)(4)* HUD's (or the recipient's) actions under any HUD program involving the repair, rehabilitation, modernization, weatherization, or improvement of existing nonresidential buildings and structures, in communities that are in the Regular Program of the NFIP and are in good standing, provided that the action does not meet the thresholds for “substantial improvement” under §

55.2(b)(10) and that the footprint of the structure and paved areas is not significantly increased.

- Continue to Question 7, Mitigation*
  
- 8-Step Process is inapplicable per 55.12(b)(1-4).  
Select the applicable citation:
  - 55.12(b)(1) HUD's mortgage insurance actions and other financial assistance for the purchasing, mortgaging or refinancing of existing one- to four-family properties in communities that are in the Regular Program of the National Flood Insurance Program (NFIP) and in good standing (i.e., not suspended from program eligibility or placed on probation under 44 CFR 59.24), where the action is not a critical action and the property is not located in a floodway or coastal high hazard area.
  - 55.12(b)(2) Financial assistance for minor repairs or improvements on one- to four-family properties that do not meet the thresholds for "substantial improvement" under § 55.2(b)(10)
  - 55.12(b)(3) HUD actions involving the disposition of individual HUD-acquired, one- to four-family properties.
  - 55.12(b)(4) HUD guarantees under the Loan Guarantee Recovery Fund Program (24 CFR part 573) of loans that refinance existing loans and mortgages, where any new construction or rehabilitation financed by the existing loan or mortgage has been completed prior to the filing of an application under the program, and the refinancing will not allow further construction or rehabilitation, nor result in any physical impacts or changes except for routine maintenance.
  - 55.12(b)(5) The approval of financial assistance to lease an existing structure located within the floodplain, but only if—
    - (i) The structure is located outside the floodway or Coastal High Hazard Area, and is in a community that is in the Regular Program of the NFIP and in good standing (i.e., not suspended from program eligibility or placed on probation under 44 CFR 59.24);
    - (ii) The project is not a critical action; and
    - (iii) The entire structure is or will be fully insured or insured to the maximum under the NFIP for at least the term of the lease.
  
- Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.*

## **7. Mitigation**

**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/minimization measures have been identified for this project in the 8-Step or 5-Step Process? Select all that apply.**

- Permeable surfaces
  - Natural landscape enhancements that maintain or restore natural hydrology
  - Planting or restoring native plant species
  - Bioswales
  - Evapotranspiration
  - Stormwater capture and reuse
  - Green or vegetative roofs with drainage provisions
  - Natural Resources Conservation Service conservation easements or similar easements
  - Floodproofing of structures
  - Elevating structures including freeboarding above the required base flood elevations
  - Other
- Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.*

### **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

As shown by the FEMA map and National Flood Hazard Layer FIRMetete map, the project is not located in a flood zone and is located in an area of minimal flood hazard. No mitigation steps necessary.

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

Yes

No

## Noise (EA Level Reviews)

General requirements	Legislation	Regulation
HUD's noise regulations protect residential properties from excessive noise exposure. HUD encourages mitigation as appropriate.	Noise Control Act of 1972  General Services Administration Federal Management Circular 75-2: "Compatible Land Uses at Federal Airfields"	Title 24 CFR 51 Subpart B
References		
<a href="https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control">https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control</a>		

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

- New construction for residential use

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

- Continue to Question 2.*

- Rehabilitation of an existing residential property

NOTE: For major or substantial rehabilitation in Normally Unacceptable zones, HUD encourages mitigation to reduce levels to acceptable compliance standards. For major rehabilitation in Unacceptable zones, HUD strongly encourages mitigation to reduce levels to acceptable compliance standards. See 24 CFR 51 Subpart B for further details.

- Continue to Question 2.*

- A research demonstration project which does not result in new construction or reconstruction, interstate, land sales registration, or any timely emergency assistance under disaster assistance provisions or appropriations which are provided to save lives, protect property, protect public health and safety, remove debris and wreckage, or assistance that has the effect of restoring facilities substantially as they existed prior to the disaster

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

- None of the above

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

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

**Indicate the findings of the Preliminary Screening below:**

- There are no noise generators found within the threshold distances above.
- Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing the location of the project relative to any noise generators.*
  
- Noise generators were found within the threshold distances.
- Continue to Question 3.*

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

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

**Indicate noise level here:**

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

**Normally Unacceptable:** (Above 65 decibels but not exceeding 75 decibels; the floor may be shifted to 70 decibels in circumstances described in 24 CFR 51.105(a))

**Indicate noise level here:**

If project is rehabilitation:

*Continue to Question 4. Provide noise analysis, including noise level and data used to complete the analysis.*

If project is new construction:

**Is the project in a largely undeveloped area<sup>1</sup>?**

No

*Continue to Question 4. Provide noise analysis, including noise level and data used to complete the analysis, and any other relevant information.*

Yes

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

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

Unacceptable: (Above 75 decibels)

Indicate noise level here:

If project is rehabilitation:

HUD strongly encourages conversion of noise-exposed sites to land uses compatible with high noise levels. Consider converting this property to a non-residential use compatible with high noise levels.

Continue to Question 4. Provide noise analysis, including noise level and data used to complete the analysis, and any other relevant information.

If project is new construction:

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

Convert to an EIS

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

Continue to Question 4.

Provide waiver

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

Continue to Question 4.

- 4. HUD strongly encourages mitigation be used to eliminate adverse noise impacts. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation. This information will be automatically included in the Mitigation summary for the environmental review.**

Mitigation as follows will be implemented:

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

No mitigation is necessary.

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

According to a Phase I Environmental Site Assessment Report conducted by Environmental Consulting Group, Inc. (ECG) on May 20, 2025, the subject property is not located within 1,000 of a major highway, within 15 miles of a military airport or within 5 miles of a civil airport. A Union Pacific Railway railroad and Metra Commuter railroad are located approximately 400 feet west of the subject property. No excessive noise levels were noted during ECG's site inspection. ECG completed a noise assessment according to HUD regulations and using the electronic Site DNL Calculator. The maximum calculated noise level for the subject property is approximately 58 db. This level is within the acceptable levels as defined by HUD.

Continue to the Worksheet Summary.

### **Worksheet Summary**

#### **Compliance Determination**

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

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

Please see Day/Night Noise Level (DNL) Calculator included. This calculator was completed on 5/19/2025 by Tom Culig of Environmental Consulting Group, Inc., as part of the Phase 1 Environmental Site Assessment performed for the site property.

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

Yes

No

## Sole Source Aquifers (CEST and EA)

General requirements	Legislation	Regulation
The Safe Drinking Water Act of 1974 protects drinking water systems which are the sole or principal drinking water source for an area and which, if contaminated, would create a significant hazard to public health.	Safe Drinking Water Act of 1974 (42 U.S.C. 201, 300f et seq., and 21 U.S.C. 349)	40 CFR Part 149
<b>Reference</b>		
<a href="https://www.hudexchange.info/environmental-review/sole-source-aquifers">https://www.hudexchange.info/environmental-review/sole-source-aquifers</a>		

### 1. Is the project located on a sole source aquifer (SSA)<sup>1</sup>?

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

Yes  Continue to Question 2.

### 2. Does your project consist solely of acquisition, leasing, or rehabilitation of an existing building(s)?

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

No  Continue to Question 3.

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

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

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

No  Continue to Question 5.

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

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

No  Continue to Question 5.

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<sup>1</sup> A sole source aquifer is defined as an aquifer that supplies at least 50 percent of the drinking water consumed in the area overlying the aquifer. This includes streamflow source areas, which are upstream areas of losing streams that flow into the recharge area.

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

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

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

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

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

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

**Worksheet Summary**

**Compliance Determination**

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

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

Based on the US EPA Region V, Designated Sole Source Aquifers map provided, the only aquifer in Illinois (Mahomet Aquifer) is over 150 miles from the project site.

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

Yes

No

## 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

According to an Illinois Department of Natural Resources assessment of the project site through EcoCAT, the project site is not located within 205 feet of a wetland area.

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

Yes

No