

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

**Project Information**

**Project Name:** 999-1015-Howard-Street---Evergreen

**HEROS Number:** 900000010120315

**Responsible Entity (RE):** EVANSTON, 2100 Ridge Ave Evanston IL, 60201

**RE Preparer:** Jessica Wingader

**State / Local Identifier:**

**Certifying Officer:** Johanna Leonard

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

**Point of Contact:**

**Consultant (if applicable):**

**Point of Contact:**

**Project Location:** 999 Howard St, Evanston, IL 60202

**Additional Location Information:**

The full address of the property covered by the project is 999-1015 Howard Street.

**Direct Comments to:** Sarah Flax, Housing & Grants Manager  
City of Evanston, Housing and Grants Division, Room 3105

2100 Ridge Avenue,  
Evanston, IL 60201  
or to [sflax@cityofevanston.org](mailto:sflax@cityofevanston.org)

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

The Evergreen/CJE Senior Housing Project is a 60 unit senior housing development located at 999-1015 Howard Street is funded with low income housing tax credits and City of Evanston HOME funding. In addition to the new development, the existing CJE building that provides a senior day program and transportation services and will provide supportive services to the residents of the new development. This project will increase the supply of housing affordable to low income seniors; half of all units will have Project Based Vouchers from the Housing Authority of Cook County and the Illinois State Referral Network. It will also expand the supply of accessible units; 6 units will be fully accessible, two units will be designed for persons with sensory impairments, and 6 more will be adaptable, in compliance with Fair Housing requirements. All units will include additional Universal Design features that exceed requirements. The project is funded with Low Income Housing Tax Credits from the Illinois Housing Development Authority. The City of Evanston is contributing \$500,000 of HOME Investment Partnership funding and \$1,500,000 of local Affordable Housing Fund dollars. The Housing Authority of Cook County is contributing approximately \$7,525,000 of Project Based Voucher support for 30 of the 60 units for 20 years.

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

This project addresses the following housing needs in Evanston identified through the City's affordable housing planning process, as well as in the Consolidated Plan and Age Friendly Evanston Action Plan: Increases the supply of housing affordable to low income seniors identified as a high need by providing 60 new units, 12 at 30% AMI, 24 at 50% AMI and 24 at 60% AMI. Half of all units will have Project Based Vouchers (PBV) from the Housing Authority of Cook County and the Illinois State Referral Network, so residents will pay 30% of their income toward rent and utilities and the PBV will cover the remainder. Adds new affordable units at a low per-unit cost (\$33,333) to the City by leveraging federal, state and regional resources. The units will be affordable for a minimum of 30 years. Expands the supply of accessible units; 6 units (10%) will be fully accessible; 2 units will be designed for persons with sensory impairments; 6 more units will be adaptable, in compliance with Fair Housing requirements. All units include additional Universal Design features that exceed requirements. The project is in partnership with CJE Senior Life, with CJE contributing much of the project site, which addresses one of the biggest challenges to the development of affordable housing. CJE's existing building will be renovated as part of the project and its senior day services and transportation services will continue to be provided there. In addition, the entire project will be on the property tax rolls as required with LIHTC funding, and will add an estimated \$65,000 - \$70,000 in new property tax revenue annually, about 20% of which will be the City's portion. The project will also activate the long vacant Dairy Queen site and further the City's goals to redevelop the Howard Street corridor.

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

The site consists of a rectangular-shaped, approximately 1.37 acres parcel, developed with a partial two-story, senior day center and an unoccupied one-story restaurant structure. The remainder of the subject property consists of asphalt-paved parking areas with fencing along the perimeter. Historical investigation indicates that the site was developed with the existing structures by 1952. The structure located on the eastern portion (999 Howard Street) is currently unoccupied. However, the site has been utilized for various commercial purposes including recently by Dairy Queen and other fast food restaurants. The structure located on the western portion (1015 Howard Street) has been utilized for various commercial purposes including as a grocery until undergoing a gut renovation in the 1980s, since which time the site has been utilized solely as a senior center.

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

- [IMG\\_2310.jpg](#)
- [IMG\\_2309.jpg](#)
- [IMG\\_2308.jpg](#)
- [IMG\\_2307.jpg](#)
- [IMG\\_2306.jpg](#)
- [IMG\\_2305.jpg](#)

**Determination:**

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

**Approval Documents:**

[Executed Sig page.pdf](#)

**7015.15 certified by Certifying Officer**  
on:

**7015.16 certified by Authorizing Officer**  
on:

**Funding Information**

Grant / Project Identification Number	HUD Program	Program Name
IL25VO0341	Public Housing	Project-Based Voucher Program

M19-MC170218	Community Planning and Development (CPD)	HOME Program
M20-MC17021	Community Planning and Development (CPD)	HOME Program
M21-MC17021	Community Planning and Development (CPD)	HOME Program

**Estimated Total HUD Funded, Assisted or Insured Amount:** \$8,250,000.00

**Estimated Total Project Cost [24 CFR 58.2 (a) (5)]:** \$24,766,000.00

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

<b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6	Are formal compliance steps or mitigation required?	Compliance determination (See Appendix A for source determinations)
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 &amp; § 58.6</b>		
<b>Airport Hazards</b> Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements.
<b>Coastal Barrier Resources Act</b> Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is located in a state that does not contain CBRS units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.
<b>Flood Insurance</b> Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Based on the project description the project includes no activities that would require further evaluation under this section. The project does not require flood insurance or is excepted from flood insurance. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with Flood Insurance requirements.

<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 &amp; § 58.5</b>		
<b>Air Quality</b> Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project's county or air quality management district is in non-attainment status for the following: Sulfur dioxide, Ozone. This project does not exceed de minimis emissions levels or the screening level established by the state or air quality management district for the pollutant(s) identified above. The project is in compliance with the Clean Air Act.
<b>Coastal Zone Management Act</b> Coastal Zone Management Act, sections 307(c) & (d)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is not located in or does not affect a Coastal Zone as defined in the state Coastal Management Plan. The project is in compliance with the Coastal Zone Management Act.
<b>Contamination and Toxic Substances</b> 24 CFR 50.3(i) & 58.5(i)(2)]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Site contamination was evaluated as follows: None of the above. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. The project is in compliance with contamination and toxic substances requirements.
<b>Endangered Species Act</b> Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project will have No Effect on listed species due to the nature of the activities involved in the project. This project is in compliance with the Endangered Species Act.
<b>Explosive and Flammable Hazards</b> Above-Ground Tanks)[24 CFR Part 51 Subpart C	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There are no current or planned stationary aboveground storage containers of concern within 1 mile of the project site. The project is in compliance with explosive and flammable hazard requirements.
<b>Farmlands Protection</b> Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is in compliance with the Farmland Protection Policy Act.
<b>Floodplain Management</b> Executive Order 11988, particularly section 2(a); 24 CFR Part 55	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project does not occur in a floodplain. The project is in compliance with Executive Order 11988.
<b>Historic Preservation</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Based on the project description the

National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800		project has No Potential to Cause Effects. The project is in compliance with Section 106.
<b>Noise Abatement and Control</b> Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The Preliminary Screening identified no noise generators in the vicinity of the project. The project is in compliance with HUD's Noise regulation. Howard Street borders the subject property to the south and is considered a major thoroughfare. The Day/Night Noise Level (DNL) calculator provided on the HUD website was used to calculate noise levels. The calculator indicated noise sources are 63.67 decibels; a decibel level below 65 does not require mitigation.
<b>Sole Source Aquifers</b> Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project is not located on a sole source aquifer area. The project is in compliance with Sole Source Aquifer requirements. The property is located in excess of 70 miles from the Mohamet Aquifer in Illinois
<b>Wetlands Protection</b> Executive Order 11990, particularly sections 2 and 5	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project will not impact on- or off-site wetlands. The project is in compliance with Executive Order 11990. According to the national Wetlands Inventory Map and the NEPAAssist website, there are no federally designated wetlands located on the property.
<b>Wild and Scenic Rivers Act</b> Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act. According to the United States Fish and Wildlife Service and NEPAAssist, the nearest designated Wild and Scenic River, the Vermilion River, is located in excess of 70 miles from the subject property.
<b>HUD HOUSING ENVIRONMENTAL STANDARDS</b>		
<b>ENVIRONMENTAL JUSTICE</b>		
<b>Environmental Justice</b> Executive Order 12898	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	No adverse environmental impacts were identified in the project's total environmental review. The project is in

		compliance with Executive Order 12898. The property is located in a predominantly middle income minority neighborhood. The proposed project (senior living facility) will not have a disproportionate or adverse impact on protected classes.
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**Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27]**

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

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

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
<b>LAND DEVELOPMENT</b>			
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design		City Council approved Ordinance 8-O-20 granting a special use permit for a planned development located at 999-1015 Howard Street in the B2 Business District.	No mitigation plan necessary.
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff		According to the ISGS Web Soil Survey, the soils at the site consist of urban land. In addition, the site will be engineered to control the surface flow of storm water, and will be professionally landscaped and maintained.	No mitigation plan necessary
Hazards and Nuisances including Site Safety and Site-Generated Noise		There are no abandoned coal mines on or near the site. Radon is not a concern since the levels are identified to be at 1.1 pCi/L for the property zip code	No mitigation plan necessary
Energy Consumption/Energy Efficiency		The redevelopment includes new HVAC units.	No mitigation plan necessary
<b>SOCIOECONOMIC</b>			
Employment and Income Patterns		The new residents of the proposed housing would be expected to seek	No mitigation

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
<b>LAND DEVELOPMENT</b>			
		services and shop nearby. Employment/Income patterns will not be significantly affected, they will increase slightly. This housing may attract new businesses and services.	plan necessary
Demographic Character Changes / Displacement		The proposed project would not significantly alter the demographic character of the neighborhood and will not result in physical barriers or reduced access to any neighborhoods. The proposed project would provide additional senior housing options in the area.	No mitigation plan necessary
<b>COMMUNITY FACILITIES AND SERVICES</b>			
Educational and Cultural Facilities (Access and Capacity)		The property is located in the Howard street commercial corridor; there are numerous churches within a mile radius of the property, a cabaret-style theatre, and many diverse restaurants.	No mitigation plan necessary
Commercial Facilities (Access and Proximity)		There are multiple commercial options for residents within a mile radius, including a Jewel-Osco and CVS Pharmacy.	No mitigation plan necessary
Health Care / Social Services (Access and Capacity)		The St. Francis Hospital is located approximately .03 miles from the property.	No mitigation plan necessary
Solid Waste Disposal and Recycling (Feasibility and Capacity)		The site is utilized solely as a senior center, and wastes generated at the subject property appear to consist of general refuse and is stored receptacles located on the site.	No mitigation plan necessary
Waste Water and Sanitary Sewers (Feasibility and Capacity)		The site use will continue to produce general refuse and the sites wastes are expected to continue to be handled through private contracting.	No mitigation plan necessary
Water Supply (Feasibility and Capacity)		Water service is provided by the City of Evanston via treated Lake Michigan water.	No mitigation plan necessary
Public Safety - Police, Fire and Emergency Medical		City of Evanston and City of Chicago fire stations are located within 1 mile of the	No mitigation



Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
<b>LAND DEVELOPMENT</b>			
		site. City of Evanston and City of Chicago police stations are located within 2 miles of the site. 911 service is provided by the City of Evanston.	plan necessary
Parks, Open Space and Recreation (Access and Capacity)		There are multiple parks located within a one mile radius of the property.	No mitigation plan necessary
Transportation and Accessibility (Access and Capacity)		Numerous public transit options are located near the property.	No mitigation plan necessary
<b>NATURAL FEATURES</b>			
Unique Natural Features /Water Resources		There are no unique natural features on the site.	No mitigation plan necessary
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)		The activities associated with the proposed action are not expected to generate adverse impacts on vegetation or wildlife. Landscaping as a result will improve streetscape.	No mitigation plan necessary
Other Factors		None	No mitigation plan necessary

**Supporting documentation**

[List of sources agencies and persons consulted.pdf](#)

**Additional Studies Performed:**

Not applicable.

**Field Inspection [Optional]:** Date and completed

by:

Sarah Flax

3/19/2020 12:00:00 AM

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[IMG\\_2308.jpg](#)

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[IMG\\_2306.jpg](#)  
[IMG\\_2305.jpg](#)

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

List of Sources, Agencies and Persons Consulted attached.

[List of sources agencies and persons consulted\(1\).pdf](#)

**List of Permits Obtained:**

Zoning review and approval received. Building plan review pending.

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

The City of Evanston will post the combined Notice of Finding of No Significant Impact and Notice of Intent to Request Release of Funds on the City's website and at the CJE building located at 999 Howard Street. Notice of the posting will be included in the City's ENewsletter that reaches over 50,000 people. Notice will be emailed to a distribution list of people who subscribed to receive information and actions related to the City's consolidated plans, planning process, and use of federal funds.

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

The scope of work entails rehab to the existing building and parking areas. The demolition of the long vacant Dairy Queen and construction of the 60 senior housing units will have a cumulative positive impact on the area identified by the report. This will not have a cumulative impact on the areas identified in this report.

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

Not applicable.

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

Not applicable.

**Summary of Findings and Conclusions:**

The existing structures have been located at this site since the 1950s. The scope of work entails only minor rehab to the existing senior center (1015 Howard Street) and to connect to the new construction located at 999 Howard Street. This will include adding 60 senior housing units to the site. These units are much needed in Evanston, particularly with the service component located on site. The proposed renovations will improve the human environment and help the revitalization of Howard Street.

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

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

<b>Law, Authority, or Factor</b>	<b>Mitigation Measure or Condition</b>	<b>Comments on Completed Measures</b>	<b>Complete</b>
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	No mitigation plan necessary.	N/A	
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	No mitigation plan necessary	N/A	
Hazards and Nuisances including Site Safety and Site-Generated Noise	No mitigation plan necessary	N/A	
Energy Consumption/Energy Efficiency	No mitigation plan necessary	N/A	
Employment and Income Patterns	No mitigation plan necessary	N/A	
Demographic Character Changes / Displacement	No mitigation plan necessary	N/A	
Educational and Cultural Facilities (Access and Capacity)	No mitigation plan necessary	N/A	
Commercial Facilities (Access and Proximity)	No mitigation plan necessary	N/A	
Health Care / Social Services (Access and Capacity)	No mitigation plan necessary	N/A	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	No mitigation plan necessary	N/A	

Waste Water and Sanitary Sewers (Feasibility and Capacity)	No mitigation plan necessary	N/A	
Water Supply (Feasibility and Capacity)	No mitigation plan necessary	N/A	
Public Safety - Police, Fire and Emergency Medical	No mitigation plan necessary	N/A	
Parks, Open Space and Recreation (Access and Capacity)	No mitigation plan necessary	N/A	
Transportation and Accessibility (Access and Capacity)	No mitigation plan necessary	N/A	
Unique Natural Features /Water Resources	No mitigation plan necessary	N/A	
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	No mitigation plan necessary	N/A	
Other Factors	No mitigation plan necessary	N/A	
Permits, reviews and approvals	Zoning review and approval received. Building plan review pending.	N/A	

**Mitigation Plan**

No mitigation plan necessary.

**Supporting documentation on completed measures**

## APPENDIX A: Related Federal Laws and Authorities

### Airport Hazards

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

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

✓ No

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

Yes

#### Screen Summary

##### **Compliance Determination**

The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements.

##### **Supporting documentation**

[Airport Hazards Worksheet.pdf](#)  
[ORD-Evanston-AirspaceProximity-Exhibit-082311.pdf](#)  
[Part150NoiseContours.pdf](#)  
[Chicago Exec Airport 2011 Noise exp map.pdf](#)  
[ORD-OMP-FullBuildOutNoiseContour.pdf](#)  
[MDW Noise Contour Map.pdf](#)

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

Yes

✓ No

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Evergreen

Evanston, IL

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### Coastal Barrier Resources

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

**This project is located in a state that does not contain CBRA units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.**

#### Compliance Determination

This project is located in a state that does not contain CBRS units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.

#### Supporting documentation

[Coastal Barrier Resources Worksheet.pdf](#)

[Coastal Barrier Resource map of USA.pdf](#)

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

Yes

✓ No

## Flood Insurance

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

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

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

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

Yes

### **Screen Summary**

#### **Compliance Determination**

Based on the project description the project includes no activities that would require further evaluation under this section. The project does not require flood insurance or is excepted from flood insurance. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with Flood Insurance requirements.

#### **Supporting documentation**

[Flood-Insurance-Worksheet.pdf](#)

[Full page Howard FIRM map.pdf](#)

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

Yes

- ✓ No



### Air Quality

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

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

Yes

No

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

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

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

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

Carbon Monoxide

Lead

Nitrogen dioxide

Sulfur dioxide

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

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

Sulfur dioxide 25.00 ppb (parts per billion)  
 Ozone 100.00 ppb (parts per million)

**Provide your source used to determine levels here:**

<https://www.epa.gov/general-conformity/de-minimis-tables>

**4. Determine the estimated emissions levels of your project. Will your project exceed any of the *de minimis* or threshold emissions levels of non-attainment and maintenance level pollutants or exceed the screening levels established by the state or air quality management district?**

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

**Enter the estimate emission levels:**

Sulfur dioxide 10.00 ppb (parts per billion)  
 Ozone 50.00 ppb (parts per million)

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

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

**Screen Summary**

**Compliance Determination**

The project's county or air quality management district is in non-attainment status for the following: Sulfur dioxide, Ozone. This project does not exceed *de minimis* emissions levels or the screening level established by the state or air quality management district for the pollutant(s) identified above. The project is in compliance with the Clean Air Act.

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**Supporting documentation**

[de minimis tables.pdf](#)

[Air Quality Worksheet.pdf](#)

[il8\\_2015 Air Quality map.pdf](#)

[ilso2\\_2010 - sulfur dioxide.pdf](#)

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

Yes

✓ No

### Coastal Zone Management Act

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

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

Yes

No

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

**Screen Summary**

**Compliance Determination**

This project is not located in or does not affect a Coastal Zone as defined in the state Coastal Management Plan. The project is in compliance with the Coastal Zone Management Act.

**Supporting documentation**

[Coastal Zone Management Worksheet.pdf](#)

[COE Coastal Boundaries Map.pdf](#)

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

Yes

No

### Contamination and Toxic Substances

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

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

- American Society for Testing and Materials (ASTM) Phase I Environmental Site Assessment (ESA)
- ASTM Phase II ESA
- Remediation or clean-up plan
- ASTM Vapor Encroachment Screening

None of the Above

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

No

**Explain:**

There are no adjacent sites that are listed as generators of hazardous waste. See attachment of EJScreen website.

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

Yes

**Screen Summary**

**Compliance Determination**

Site contamination was evaluated as follows: None of the above. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of

project occupants or conflict with the intended use of the property were not found. The project is in compliance with contamination and toxic substances requirements.

**Supporting documentation**

[EPA Contamination map.pdf](#)

[Contamination and Toxic Substances Site Contamination Multi Family Worksheet.pdf](#)

[Tab 14- Environmental Clearance 27.pdf](#)

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

Yes

✓ No

### Endangered Species

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

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

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

This selection is only appropriate if none of the activities involved in the project have potential to affect species or habitats. Examples of actions without potential to affect listed species may include: purchasing existing buildings, completing interior renovations to existing buildings, and replacing exterior paint or siding on existing buildings.

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

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

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

**Screen Summary**

**Compliance Determination**

This project will have No Effect on listed species due to the nature of the activities involved in the project. This project is in compliance with the Endangered Species Act.

**Supporting documentation**

[USFWS\\_Illinois Threatened and Endangered Species.pdf](#)

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

Yes

✓ No



### Explosive and Flammable Hazards

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

**1. Is the proposed HUD-assisted project a hazardous facility (a facility that mainly stores, handles or processes flammable or combustible chemicals), i.e. bulk fuel storage facilities, refineries, etc.?**

No

Yes

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

No

Yes

**3. Within 1 mile of the project site, are there any current *or planned* stationary aboveground storage containers:**

- 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. Document and upload all documents used to make your determination below.

Yes

**Screen Summary**

**Compliance Determination**

There are no current or planned stationary aboveground storage containers of concern within 1 mile of the project site. The project is in compliance with explosive and flammable hazard requirements.

**Supporting documentation**

[Explosive and Flammable Facilities Worksheet.pdf](#)

[AST map - 2015.pdf](#)

[AST list of addresses eff 2015.pdf](#)

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

Yes

✓ No

### Farmlands Protection

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

No

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

The property is currently developed with a multifamily residential healthcare structure and is not presently being farmed, forested or being used as cropland. Please see attachment titled Farming on the Edge. Additionally, project falls under definition of Urban and built-up areas as stated in NRCS letter attached.

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

**Screen Summary**

**Compliance Determination**

This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is in compliance with the Farmland Protection Policy Act.

**Supporting documentation**

[Farmlands Protection Worksheet.pdf](#)

[Evanston Letter.pdf](#)

[Farming on the Edge.pdf](#)

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

Yes

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✓ No

## Floodplain Management

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

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

- 55.12(c)(3)
- 55.12(c)(4)
- 55.12(c)(5)
- 55.12(c)(6)
- 55.12(c)(7)
- 55.12(c)(8)
- 55.12(c)(9)
- 55.12(c)(10)
- 55.12(c)(11)
- None of the above

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

[Floodplain Management Worksheet.pdf](#)  
[FEMA Flood Map Service Center Map.pdf](#)

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

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

- No

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

Yes

**Screen Summary**

**Compliance Determination**

This project does not occur in a floodplain. The project is in compliance with Executive Order 11988.

**Supporting documentation**

[Floodplain Management Worksheet\(1\).pdf](#)

[FEMA Flood Map Service Center Map\(1\).pdf](#)

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

Yes

✓ No

## Historic Preservation

General requirements	Legislation	Regulation
Regulations under Section 106 of the National Historic Preservation Act (NHPA) require a consultative process to identify historic properties, assess project impacts on them, and avoid, minimize, or mitigate adverse effects	Section 106 of the National Historic Preservation Act (16 U.S.C. 470f)	36 CFR 800 "Protection of Historic Properties" <a href="http://www.access.gpo.gov/nara/cfr/waisidx_10/36cfr800_10.html">http://www.access.gpo.gov/nara/cfr/waisidx_10/36cfr800_10.html</a>

### **Threshold**

#### **Is Section 106 review required for your project?**

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

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

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

#### **Threshold (b). Document and upload the memo or explanation/justification of the other determination below:**

A No Potential to Cause Effects was determined by the City of Evanston's Senior Planner/Preservation Coordinator on March 5, 2020.

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

### **Screen Summary**

#### **Compliance Determination**

Based on the project description the project has No Potential to Cause Effects. The project is in compliance with Section 106.

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**Supporting documentation**

[Historic Preservation review request.pdf](#)

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

Yes

✓ No



### Noise Abatement and Control

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

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

- New construction for residential use

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

- Rehabilitation of an existing residential property

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.

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

An interstate land sales registration

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

None of the above

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

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

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

Based on the response, the review is in compliance with this section. Document and upload a map showing the location of the project relative to any noise generators below.

Noise generators were found within the threshold distances.

**Screen Summary**

**Compliance Determination**

The Preliminary Screening identified no noise generators in the vicinity of the project. The project is in compliance with HUD's Noise regulation. Howard Street borders the subject property to the south and is considered a major thoroughfare. The Day/Night Noise Level (DNL) calculator provided on the HUD website was used to calculate noise levels. The calculator indicated noise sources are 63.67 decibels; a decibel level below 65 does not require mitigation.

**Supporting documentation**

[Noise Abatement and Control EA Worksheet.pdf](#)

[Noise Abatement image.pdf](#)

[Noise Abatement capture.PNG](#)

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

Yes

- ✓ No

### Sole Source Aquifers

General requirements	Legislation	Regulation
<b>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.</b>	Safe Drinking Water Act of 1974 (42 U.S.C. 201, 300f et seq., and 21 U.S.C. 349)	40 CFR Part 149

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

Yes

✓ No

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

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

✓ No

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

Yes

#### Screen Summary

##### **Compliance Determination**

The project is not located on a sole source aquifer area. The project is in compliance with Sole Source Aquifer requirements. The property is located in excess of 70 miles from the Mohamet Aquifer in Illinois

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**Supporting documentation**

[Sole Source Aquifers Worksheet.pdf](#)

[Sole Source Aquifers map.pdf](#)

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

Yes

✓ No

### Wetlands Protection

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

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

No

✓ Yes

**2. Will the new construction or other ground disturbance impact an on- or off-site wetland? The term "wetlands" means those areas that are inundated by surface or ground water with a frequency sufficient to support, and under normal circumstances does or would support, a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bogs, and similar areas such as sloughs, potholes, wet meadows, river overflows, mud flats, and natural ponds.**

**"Wetlands under E.O. 11990 include isolated and non-jurisdictional wetlands."**

✓ No, a wetland will not be impacted in terms of E.O. 11990’s definition of new construction.

Based on the response, the review is in compliance with this section. Document and upload a map or any other relevant documentation below which explains your determination

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

### Screen Summary

**Compliance Determination**

The project will not impact on- or off-site wetlands. The project is in compliance with Executive Order 11990. According to the national Wetlands Inventory Map and the NEPAassist website, there are no federally designated wetlands located on the property.

**Supporting documentation**

[Wetlands Protection Worksheet.pdf](#)

[National Wetlands.pdf](#)

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

Yes

✓ No

## Wild and Scenic Rivers Act

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

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

✓ No

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

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

### Screen Summary

#### **Compliance Determination**

This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act. According to the United States Fish and Wildlife Service and NEPAassist, the nearest designated Wild and Scenic River, the Vermilion River, is located in excess of 70 miles from the subject property.

#### **Supporting documentation**

[Wild and Scenic River map.pdf](#)

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

Yes

✓ No

### Environmental Justice

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

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

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

Yes

✓ No

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

#### **Screen Summary**

##### **Compliance Determination**

No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898. The property is located in a predominantly middle income minority neighborhood. The proposed project (senior living facility) will not have a disproportionate or adverse impact on protected classes.

##### **Supporting documentation**

[Evanston 311 About My Place.pdf](#)

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

Yes

✓ No



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