**Environmental Assessment**

**Determinations and Compliance Findings**

**for HUD-assisted Projects**

**24 CFR Part 58**

# Project Information

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| **Project Name:** | Westside-Evolves |

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| **HEROS Number:**  | 900000010315804 |

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| **Responsible Entity (RE):**  | CHATTANOOGA, 100 E 11th St Ste 101 Chattanooga TN, 37402 |

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| **RE Preparer:**  | Regina Partap |

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| **State / Local Identifier:**  |  |

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| **Certifying Officer:** | Richard Beeland, Administrator |

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

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| **Point of Contact:**  | Mark Bell |

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| **Consultant (if applicable):** | Barge Design Solutions |

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| **Point of Contact:**  | Amanda Pagels |

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| **Project Location:** | 1241 Grove St, Chattanooga, TN 37402 |

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| **Additional Location Information:** |
| The Westside located in Chattanooga, Tennessee, is roughly 435 acres within the City of Chattanooga that is bounded by U.S. Highway 27 and downtown Chattanooga to the east, Main Street to the south, MLK Boulevard to the north, and Riverfront Parkway and the Tennessee River to the west. The Westside is a mixture of privately owned sites and CHA and City controlled land. The Street location is the former J.A. Henry school since it is centrally located within the Westside Community. |

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| **Direct Comments to:** |  |

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| **Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:** |
| The current Westside Evolves Master Plan includes fourteen separate Phases to fully transform the community. The Plan incorporates a variety of housing options and styles rather than a ''one size fits all'' approach. This strategy gives residents the option to live in senior-only buildings, family-friendly units, and ADA compliant units all while remaining in the community. Each phase is described below in detail. The Development and Phasing summary and attachments can be found in Appendix A- Phasing Plans. Each area is designated a letter to correspond with its location on the Draft Phasing Plan dated October 6, 2023, which can be found in Appendix A- Phasing Exhibits and the Phasing Description. The rehabilitation of the James A. Henry building, and the Sheila Jennings Park will occur concurrently with Phase I that the Chattanooga Housing Authority is planning. Details for all Phases and site development can be found in the attachments below under Project Location. This environmental assessment will serve as a type of Tier 1 review where everything that is known and projected is included in this assessment, and as the later phases become finalized, the activities will be re-evaluated based on this assessment and the environmental review record updated with site specific evaluations and compliance. |

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

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| The Westside community, while within walking distance of downtown, has not benefited from the downtown commercial, residential, and tourism resurgence. The community is outdated and the housing and community centers are inadequate for the residents. To ensure the safety and health of the current and future residents, the housing needs to be updated and repaired to suit the needs of residents who have varying physical abilities and family types. Without these vital updates, the Westside will continue to decline. The current residents be forced to eventually relocate to better, safer housing, or end up in areas of unknown conditions. Chattanooga as a whole is in need of mixed and affordable housing throughout the City. By creating more affordable, mixed-use housing, it attracts new families and residents to the community that is in dire need of change. Please refer to the EA Body\_ January 12 2024 document for more information. |

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

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| The Westside is one of Chattanooga's oldest neighborhoods. Currently, this community is home to approximately 1,500 families of various backgrounds. This site was originally the home to Native American/Indigenous people who were eventually relocated to surrounding areas once the Tennessee River Valley and Chattanooga area were beginning to become settled by mostly settlers of European descent. Shortly after, and with its high vantage point, the site became a lookout point during the Civil War. Once the war had ended, former slaves from surrounding areas and states along with other African American groups began to settle the area. As the City of Chattanooga was established, this side of town eventually became to be called the Westside. Soon after the Civil War, the area began to bloom with industrial and business opportunities. The majority of Chattanooga's population was African American and concentrated in and around the fourth ward, which is largely known as the Westside today. To help the community evolve with the it's growing population, the J.A. Henry school was founded in Chattanooga in the year 1937. This was the first public school to serve the black community. The area continued to expand through business and in population, and in 1938 the Chattanooga Housing Authority (CHA) was established as a way to help manage public housing needs throughout the city. The first housing development, College Hill Courts, was soon built within the Westside during the early 1940's. Around the early 1950s, the City and the Westside were beginning to decline. The streets were becoming insufficient for the flow of traffic and the growing population. Officials at the time were looking for a way to improve the City as a whole and saw the Westside as an area that could use the most attention . At that time, the U.S. was also in the middle of establishing the Federal Highway Administration (FHWA) across the nation to connect states through a federally regulated roadway. The FHWA was looking to put in a new interstate somewhere in the Chattanooga area to help connect the surrounding states. They began looking towards the Westside area as the new location of the I-24/Highway 27 interchange. . The residents of that area were scattered to other parts of the City and county. Many were left permanently displaced from the Westside. The decline in population due to displacements left the area struggling and many businesses went under, forcing further decline in the area. During the 1970s, the community and surrounding neighborhoods were in even worse decline than before the interstate relocations. Gateway Towers, a residential housing facility, was constructed specifically to house elderly from the community. The community tried to recover and establish a new beginning for itself, but unfortunately, due to the increased police presence and uptick in crime the population never recovered. That lead to the beloved James A. Henry school to close. CHA saw an opportunity to upgrade College Hill Courts and it gave more families the opportunity to move to the area. By the late 1990s The school was restored as a vital part of the community and education system. The surrounding neighborhoods began to connect through walking trails and pathways. To help establish and grow the Westside, local residents launched the Westside Evolves Community initiative. This program was intended to help to grow and expand the Westside community while also keeping the heritage and uniqueness of area. Today the area continues to expand and grow because of the efforts of those residents to help expand the community and give it the opportunity to grow, the community looked around and established needs within the Westside. More details on existing conditions can be found in the EA under section 1.4 Existing Conditions. Please refer to the EA Body\_ January 12 2024 document for more information.  |

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

[Phasing Descriptions 1\_12\_2024(1).pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000012004550)

[8-Appendix A Phasing Exhibits 12132023.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011998320)

[5-James A Henry and Sheila Jennings Park.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011998316)

[11-BargeGeneratedFigures.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011887928)

[3- TN\_Chattanooga\_USGS\_Topo\_reduced.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011887927)

[2-Property Ownership.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011887926)

[1- Project Location.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011775650)

[7-PhotoSummary docx.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011775606)

**Determination:**

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| ✓ | 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:**

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| **7015.15 certified by Certifying Officer on:** |  |

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| **7015.16 certified by Authorizing Officer on:** |  |

**Funding Information**

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| **Grant / Project Identification Number** | **HUD Program**  | **Program Name** | **Funding Amount** |
| B52 | Public Housing | Choice Neighborhoods | $50,000,000.00 |
| TBD | Community Planning and Development (CPD) | Community Development Block Grants (CDBG) (Entitlement) | $2,000,000.00 |
| TBD | Community Planning and Development (CPD) | HOME Program | $3,500,000.00 |
| TBD | Public Housing | Project-Based Voucher Program | $40,000,000.00 |

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| **Estimated Total HUD Funded, Assisted or Insured Amount:**  | $95,500,000.00 |

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| **Estimated Total Project Cost [24 CFR 58.2 (a) (5)]:** | $105,500,000.00 |

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

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| **Compliance Factors**: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6 | Are formal compliance steps or mitigation required? | Compliance determination(See Appendix A for source determinations) |
| **STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6** |
| **Airport Hazards**Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D | 🞎 Yes 🗹 No | The project location is approximaly 6.1 miles west of the Chattanooga Metropolitan Airport and is not located within a Clear Zone or Accidental Potential Zone. A map of the proposed location relative to the location of the Chattanooga Metropolitan Airport is provided within Appendix B of the EA. Therefore, no impact is anticipated as a result of the Preferred Alternative. The project is in compliance with Airport Hazards requirements. Please refer section 3.4.3 of the EA on Airport Hazards. |
| **Coastal Barrier Resources Act** Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501] | 🞎 Yes 🗹 No | The study area is located within a developed mixed-use area of residential, commercial, and industrial properties bound by Main Street, Riverfront Parkway, Highway 27, and MLK Boulevard within the City of Chattanooga and is located approximately 0.25 miles east of the Tennessee River within the Upper Nickajack Lake - Tennessee River watershed. The study area is separated from the Tennessee River by a highly industrialized section of urbanized land. The study area is not in a coastal zone; thus, this resource is not applicable to this assessment. Please refer to Section 6.6 of the EA for Coastal Barriers. This project is in compliance with the Coastal Barrier Resources Act. |
| **Flood Insurance**Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a] | 🞎 Yes 🗹 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. Please refer to Sections 3.6 and 7.3 of the EA pertaining to Flooding and Flood Insurance Prior to the construction of the Chickamauga Dam, Chattanooga was Tennessee Valley's most flood-prone city. Serious flooding damage was suffered during 1867, 1875, 1886, and 1917. The construction of the Chickamauga Dam reservoir system in 1936 along with other reservoirs on the Tennessee River and its tributaries have provided flood control to the city since and prevented nearly $5 billion in flood damage in the City of Chattanooga alone (Tennessee Valley Authority, 2023). Although the study area is located approximately 0.25 miles west of the Tennessee River, it is not located within a floodway or special flood hazard area of the river. The entirety of the study area is located within Zone X, an area of minimal flood hazard. The Westside Project is not located within a floodway or special flood zone of the Tennessee River. The entirety of the study area is located within Zone X, an area of minimal flood hazard. Therefore, flood plain management and flood insurance would not be a concern under the No Action Alternative or the Preferred Alternative. The climate continues to change, and storms and weather events are getting stronger. Floods, fires, heat, droughts, and hurricanes are all increasing in strength and intensity. Human activities can significantly impact the natural functioning of ecosystems. In particular, land management can contribute to natural hazards such as floods and droughts by removing vegetation that helps absorb water and replacing it with impervious surfaces that increase the quantity and speed of water runoff during precipitation events. The Preferred Alternative would consider these changes and would construct buildings to withstand the ever-changing climate. New construction would use the most current building materials to ensure the buildings and structures can withstand or mitigate any natural hazard that could occur in the site location. Therefore, only minor adverse impacts are anticipated as a result of implementation of the Preferred Alternative  |
| **STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5** |
| **Air Quality**Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93 | 🗹 Yes 🞎 No | The project's county or air quality management district is in attainment status for all criteria pollutants. The project is in compliance with the Clean Air Act. Please Refer to Section 3.4, 6.5.2, and 7.1 of the EA pertaining to Air Quality. CHA contacted the Air Pollution Control Bureau of Hamilton County for any compliance needs. The Westside is surrounded by a mix of residential and commercial development. Additionally, the community is bounded by heavily traveled US 27. There is no significant heavy industry, incinerator, power generating plant, or other air pollution generators near the Westside. However, there is some degree of air pollution threat for the Westside that comes from tailpipe emissions from vehicles using the roads within and surrounding the Westside. While the Preferred Alternative is located in an air quality attainment area, the National Ambient Air Quality Standards (NAAQS) assessment does not provide data specifically for the Westside. Given the existing roads, there is a chance that an air pollution issue exists in the Westside. Climate change can affect indoor and outdoor air quality. Changes in weather conditions, including temperature and precipitation, can increase ground-level ozone and particulate matter such as windblown dust and smoke from wildfires. Exposure to these pollutants can lead to or worsen health problems, such as respiratory illness and heart diseases. Mold, bacteria, and other indoor pollutants may increase as climate-related precipitation and storms increase. For example, flood damage from increased strong storms can create a damp indoor environment, leading to mold growth. Climate change has also led to longer and more frequent wildfires. Exposure to wildfire smoke can worsen respiratory illnesses, such as asthma, chronic obstructive pulmonary disease (COPD), and bronchitis. The Preferred Alternative considers the aging infrastructure community and community segregation and how climate change is affecting current and future planning for the site. The Clean Air Act (CAA) of 1970 establishes standards and regulates air emissions from stationary and mobile sources. This law authorizes EPA to establish NAAQS to protect public health and public welfare and to regulate emissions of hazardous air pollutants. Geographic areas that are in compliance with standards are called ''attainment areas,'' while areas that do not meet standards are called ''nonattainment'' areas. The Preferred Alternative is in an attainment area. Currently, only one county, Sullivan County, is listed as non-attainment in the state of Tennessee. Implementation of the No Action Alternative would not result in air quality changes. Since the study area is located within an attainment area, no adverse impacts would be anticipated as a result of the study area remaining the same. The Preferred Alternative proposes the establishment of greenspaces throughout the project. Vegetation, trees specifically, are natural pollutant filters. Trees can remove as much as 15 percent of the ozone layer, 14 percent of the sulfur dioxide (SO2), 8 percent of the nitrogen dioxide (NO2), and 0.05 percent of the carbon monoxide (CO) from the air. They also produce shade and reduce energy demand, indirectly contributing to improved air quality. The Preferred Alternative proposes to construct new housing which in turn will increase air quality and overall public health. New modern construction is efficient in keeping up with the ever-changing climate by keeping moisture and outdoor pollutants out. Modern HVAC systems are also more efficient in filtering out harmful pollutants. Due to the further improvements of air quality within the study area as a result of implementing the Preferred Alternative, a minor beneficial impact to air quality is anticipated as a result.  |
| **Coastal Zone Management Act**Coastal Zone Management Act, sections 307(c) & (d) | 🞎 Yes 🗹 No | This project is located in a state that does not participate in the Coastal Zone Management Program. Therefore, this project is in compliance with the Coastal Zone Management Act. Please refer to Section 6.6 of the EA pertaining to Coastal Zones The study area is located within a developed mixed-use area of residential, commercial, and industrial properties bound by Main Street, Riverfront Parkway, Highway 27, and MLK Boulevard within the City of Chattanooga and is located approximately 0.25 miles east of the Tennessee River within the Upper Nickajack Lake - Tennessee River watershed. The study area is separated from the Tennessee River by a highly industrialized section of urbanized land. The study area is not in a coastal zone; thus, this resource is not applicable to this assessment.  |
| **Contamination and Toxic Substances**24 CFR 50.3(i) & 58.5(i)(2)] | 🗹 Yes 🞎 No | Site contamination was evaluated as follows: ASTM Phase I ESA, ASTM Phase II ESA, Remediation or clean-up plan. On-site or nearby toxic and hazardous materials were found. The adverse environmental impacts can be mitigated. With mitigation, identified in the mitigation section of this review, the project will be in compliance with contamination and toxic substances requirements. Please Refer to Section 5.5 of the EA Body pertaining to Contamination and Toxic Substances A Phase I and a Phase II was performed on the Preferred Alternative site. The Phase I identified potential foundry in the area as a recognized environmental condition. The Phase II identified the Asbestos sampling was conducted at Gateway towers, James A. Henry School, and the Youth and Family Services Building. Each building was identified as having asbestos containing materials. Garbage collection services is provided to residents through the City's Department of Public Works. Typical Demolition debris can be disposed of at the Birchwood II C&D Landfill. Impacted soil will either be removed and disposed of property, or sealed under the foundation of the new buildings. All Asbestos materials identified will be properly disposed of to the Bradley County Landfill and within EPA guidelines and through the Hamilton County Air Pollution Control Bureau requirments. Lead and Asbestos and Radon Reports are attached below for the James Henry building, YFD, Sheila Jennings. For College Hill Courts these reports are found in the Phase I Report. Soil samples were conducted across the Westside in a Phase II analysis. Each site was tested for Volatile Organic Compounds, TPH Oil and Grease, TCLP Metals, and RCRA Metals. For a more in depth assessment of the findings in all Phase I and Phase II's please refer to the supporting documentation below or to the EA Body in Section 5.5.  |
| **Endangered Species Act**Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402 | 🗹 Yes 🞎 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. Please refer to Section 6.2 of the EA pertaining to Endangered and Threatened Species The Preferred Alternative lacks suitable habitat for almost all of the federally and state protected species. The only potential habitat that is present within the study area includes temporarily abandoned buildings which may potentially provide suitable habitat for the Indiana bat, the northern long-eared bat, and the tricolored bat. The Preferred Alternative will include temporarily moving residents to another location as part of the construction process while leaving the buildings unoccupied for an unknown length of time. The Preferred Alternative lacks suitable habitat for almost all of the federally and state protected species. During online review though, it was found that this urban fully developed City site was identified in the USFWS IPAC with potential of occurrence for the northern long-eared bat, Indiana bat, and the tricolored bat. Our opinion is possibility of any of the three species to be found within the project area are unlikely. The site lies well within the dense urban setting of the City of Chattanooga and high levels of road and urban housing noise as well as urban housing and roadside artificial lighting have been documented to have a negative effect and deter Myotis species from successfully occupying or thriving in areas with these constant stressors for sustained periods. Please refer to all documentation below. The Preferred Alternative lacks suitable habitat for almost all of the protected migratory bird species. Due to the urbanization of the study area, anthropogenic structures are located throughout that could potentially provide suitable habitat for the chimney swift. To ensure that this migratory bird species will not be impacted by the proposed redevelopment of the project, demolition of structures providing suitable habitat for the chimney swift will not occur during its breeding season. The urbanized setting of the study area lacks suitable habitat for the remaining protected species. The local USFWS Field Office has been contacted for correspondence. No comments have been received. |
| **Explosive and Flammable Hazards**Above-Ground Tanks)[24 CFR Part 51 Subpart C | 🗹 Yes 🞎 No | There is a current or planned stationary aboveground storage container of concern within 1 mile of the project site. The Separation Distance from the project was not initially acceptable. With mitigation, identified in the mitigation section of this review, the project will be in compliance with explosive and flammable hazard requirements. All potential explosive and flammable hazard requirements were evaluated in the Phase I Environmental Site Assessments that were conducted throughout the project area. |
| **Farmlands Protection**Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658 | 🞎 Yes 🗹 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. According to the NRCS, the Farmland Protection Policy Act (FPPA) is intended to minimize the impact federal programs have on the unnecessary and irreversible conversion of farmland to nonagricultural uses. No farmlands are located within the study area. Under the No Action Alternative, the Westside Project would not be implemented, and conversion of farmland would not be an issue. Since no farmlands are located within the study area, conversion of farmland to nonagricultural use is not proposed by the Preferred Alternative. Therefore, no impacts to farmlands are anticipated as a result of the Preferred Alternative. Please refer to Section 3.5 of the EA |
| **Floodplain Management**Executive Order 11988, particularly section 2(a); 24 CFR Part 55 | 🞎 Yes 🗹 No | This project does not occur in a floodplain. The project is in compliance with Executive Order 11988. Prior to the construction of the Chickamauga Dam, Chattanooga was Tennessee Valley's most flood-prone city. Serious flooding damage was suffered during 1867, 1875, 1886, and 1917. The construction of the Chickamauga Dam reservoir system in 1936 along with other reservoirs on the Tennessee River and its tributaries have provided flood control to the city since and prevented nearly $5 billion in flood damage in the City of Chattanooga alone (Tennessee Valley Authority, 2023). Although the study area is located approximately 0.25 miles west of the Tennessee River, it is not located within a floodway or special flood hazard area of the river. The entirety of the study area is located within Zone X, an area of minimal flood hazard. The Westside Project is not located within a floodway or special flood zone of the Tennessee River. The entirety of the study area is located within Zone X, an area of minimal flood hazard. Therefore, flood plain management and flood insurance would not be a concern under the No Action Alternative or the Preferred Alternative. Please refer to Section 3.6 of the EA. |
| **Historic Preservation**National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800 | 🗹 Yes 🞎 No | Based on Section 106 consultation the project will have an Adverse Effect on historic properties. With mitigation, as identified in the MOA or SMMA, the project will be in compliance with Section 106. Satisfactory implementation of the mitigation should be monitored. According to the NRHP map, the entirety of the study area is located within the Chickamauga and Chattanooga National Military Park. Additionally, numerous National Register properties are located within one mile of the study area including the Second Presbyterian Church, St. Paul's Episcopal Church, Trigg - Smartt Building, the Read House, Market Street Warehouse Historic District, and the Tivoli Theatre. No historic buildings are located within the boundary of the study area. The THC Viewer was also consulted to determine if any state historic sites were located within or near the study area. According to the THC Viewer, 455 state historic sites are located within one mile of the site. No historic sites are located within the study area. All 455 historic sites are located east of the study area and US HWY 27. The city of Chattanooga initiated coordination with the local tribes that may have a stake in the Preferred Alternative site. A total of six letters were sent on April 25, 2023 to the tribal organizations for Section 106. A 30-day response period was also initiated, and no responses were received during that time. The coordination letters are located in Appendix K. The Preferred Alternative involves the redevelopment of the Westside, the entirety of which is located within the NRHP Chickamauga and Chattanooga National Military Park. In order to accommodate redevelopment within this historic area, a Memorandum of Agreement (MOA) between the CHA and the Tennessee State Historic Preservation Office (SHPO) was signed in February 2023 and is included in Appendix K of the EA. Please refer to Section 5.2 in the EA.  |
| **Noise Abatement and Control**Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B | 🗹 Yes 🞎 No | A Noise Study was conducted. The noise level was found to be normally acceptable to normally unacceptable throughout the entire project in all phases. Mitigation is needed in areas closest to busy highways. Noise mitigation measures can be found in the EA Body below in section 5.1 Please see the Noise Study and the EA Body in the attachments below. |
| **Sole Source Aquifers**Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149 | 🞎 Yes 🗹 No | The project is not located on a sole source aquifer area. The project is in compliance with Sole Source Aquifer requirements. The study area is entirely urbanized and consists of residential, commercial, and industrial developments. Landscaped grass and trees are present throughout the study area which provide groundwater recharge and help control storm water runoff. Fragmented strips of woodland consisting of trees and shrubs are located throughout. The site is not currently subject to rapid water withdrawal problems that could negatively affect the water table or aquifers and currently utilizes public water and sewer. The Westside Project involves the redevelopment of an existing mixed-use community. A major part of the proposed plan involves updating and replacing existing housing while expanding the buildable footprint of the community by incorporating smaller, underutilized CHA properties and converting surface parking lots to mixed-use and residential developments. Due to the utilization of existing properties and parking lots, impervious surface areas will remain relatively similar, if not reduced slightly. Permeable surfaces included within the existing and proposed conditions of the study area include fragmented woodland, grassy parks, and community gardens that will aid in controlling stormwater runoff. Since the impervious surface area will remain relatively the same if not reduced slightly, and pervious surface areas will be improved by providing additional landscaping and community gardens, a minor beneficial impact is anticipated as a result of implementing the Preferred Alternative. Please refer to Section 6.1 of the EA. |
| **Wetlands Protection**Executive Order 11990, particularly sections 2 and 5 | 🞎 Yes 🗹 No | Based on the project description this project includes no activities that would require further evaluation under this section. The project is in compliance with Executive Order 11990. The study area is entirely urbanized with only landscaped portions of grass and trees and fragmented strips of woodland. No streams, lakes, wetlands, or marshes are located within the study area. The USFWS's National Wetlands Inventory (NWI) Map, the NRCS's WSS, and aerial imagery were reviewed for the presence of water resources within the study area. The USFWS NWI Map did not identify streams or wetlands within the study area. Additionally, review of aerial imagery did not identify inundations or stream like features to be present. No wild and scenic rivers are present, and the NRCS's WSS did not identify hydric soils as present within the study area. A site visit was performed on April 20, 2023, to determine if unique natural features, sensitive natural areas, or water resources were present within the site. No unique natural features, sensitive natural areas, or water resources such as wetlands, streams, or lakes were observed within the study area. Therefore, impacts to these resources are not applicable to the study area. Although no water resources are present within the study area, standard BMPs will be followed during construction to ensure all sediment and materials remain onsite during construction, minimizing potential impacts to the Tennessee River 0.25 miles to the west.  |
| **Wild and Scenic Rivers Act**Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c) | 🞎 Yes 🗹 No | This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act. The USFWS's National Wetlands Inventory (NWI) Map, the NRCS's WSS, and aerial imagery were reviewed for the presence of water resources within the study area. The USFWS NWI Map did not identify streams or wetlands within the study area. Additionally, review of aerial imagery did not identify inundations or stream like features to be present. No wild and scenic rivers are present, and the NRCS's WSS did not identify hydric soils as present within the study area. A site visit was performed on April 20, 2023, to determine if unique natural features, sensitive natural areas, or water resources were present within the site. No unique natural features, sensitive natural areas, or water resources such as wetlands, streams, or lakes were observed within the study area. Therefore, impacts to these resources are not applicable to the study area. Although no water resources are present within the study area, standard BMPs will be followed during construction to ensure all sediment and materials remain onsite during construction, minimizing potential impacts to the Tennessee River 0.25 miles to the west.  |
| **HUD HOUSING ENVIRONMENTAL STANDARDS** |
| **ENVIRONMENTAL JUSTICE** |
| **Environmental Justice**Executive Order 12898 | 🗹 Yes 🞎 No | No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898. Please Refer to Chapter 4 of the EA on Socioeconomics. That Chapter is located below as well. The Westside Plan provides insight into the current employment and income patterns within the community. Compared to the City of Chattanooga, residents of the Westside have a higher percentage of residents with an annual income less than $15,000, four times lower median income that the media income for Chattanooga, and almost a 50 percent lower employment to population ratio compared to Chattanooga. The unemployment rate for Westside residents is noticeably higher than the City of Chattanooga and Hamilton County. Implementing the Proposed Alternative creates an opportunity for Westside residents to be employed in the redevelopment process. It is anticipated there will be numerous job opportunities in construction and supporting services for residents living in the housing that will be redeveloped and those living in the privately owned housing in Westside. With the buildout for this project lasting several years, the new job opportunities have the potential to be long-term. Additionally, there will be opportunities for some post construction jobs in the areas of grounds and building maintenance and jobs related to social services that will be provided for the Westside community. The Plan also discusses a partnership with the new construction trades school opening in East Chattanooga. Additionally, if new businesses can be recruited to the area, this will open jobs for Westside residents. This will be augmented with local, in-neighborhood hiring agreements and creating training opportunities, potentially in partnership with the Chamber of Commerce and/or Chattanooga State Community College. In summary, as the Westside Plan is implemented, residents of the community will be afforded new higher paying career opportunities and will have access to the training needed to fill these new positions. Implementing the Proposed Action will result in significant upgrades to the Westside. As described in the Plan, the existing 629 units in Gateway Tower and College Hill Courts will be demolished and replaced with 1783 new units. In place of the existing 629 units will be a new mixed-income community. Additionally, there is a possibility the number of new residences may increase to over 3,000 by adding additional sites. Current residents are guaranteed a new place to live if they choose to stay in the Westside. The build-first strategy will use existing vacant land to construct new residences before demolishing any existing residences. This will allow individuals and families to remain in the Westside and not be temporarily displaced. Depending on the new residents moving into the Westside, the Proposed Action may diversify the community's demographics. However, this is a goal of the Plan, thus it is not considered an adverse effect. Implementing the Proposed Alternative would address the 1994 Presidential Executive Order (EO) 12898, Federal Actions To Address Environmental Justice in Minority Populations and Low-Income Populations, which directs federal agencies to make ''achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations in the United States and its territories and possessions, the District of Columbia, the Commonwealth of Puerto Rico, and the Commonwealth of the Mariana Islands'' (EO 12898, 1994). The Westside Plan will also result in reducing environmental hazards, improving health-related issues, and providing much needed investment that will improve the infrastructure of the Westside.  |

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

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

**(1)** Minor beneficial impact

**(2)** No impact anticipated

**(3)** Minor Adverse Impact – May require mitigation

**(4)** Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement.

| **Environmental Assessment Factor** | **Impact Code** | **Impact Evaluation** | **Mitigation** |
| --- | --- | --- | --- |
| **LAND DEVELOPMENT** |
| Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design | 1 | The Preferred Alternative is located in an urbanized area within the City of Chattanooga in the Westside Community. The current area is already zoned as R-3 (Multi-Family Residential), R-4 (Office and Residential), C-2 and C-3 (Commercial), M-1 (Industrial), and O-1 (Office and Residential). The area would not change in zoning, land use, or change any conformance plans. CHA plans to transform the Westside Community into a place that is more efficient and for the overall health of the residents of the community  |   |
| Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff | 3 | The proposed action would have no new soil disturbances on undeveloped lands. The building locations are already on previously disturbed sites. The site would utilize the current storm water infrastructure that is already at the site location. | Best management practices would be utilized to prevent erosion and drainage and storm water runoff. All storm water inlets must be covered to prevent construction debris from entering the storm water system. All slopes will be in accordance with the industry standards. Impacted soil will either be removed and disposed of property or sealed under the foundation of the new buildings. A Brownfield Agreement with the State of Tennessee would be implemented to ensure contaminated soil is not disturbed in a way that would harm human health. The current water supply and wastewater system are large enough to accommodate the slight increase in population to the Westside. All newly constructed residential and commercial housing will utilize water conserving appliances, toilets, and fixtures. The addition of more greenspaces and the use of permeable surfaces must be used to reduce rain runoff into the storm water system. Per the requirements of the Chattanooga's Consent Decree with EPA (April 24, 2013) and City's RainSmart program, which aims to increase water quality and reduce runoff, all new landscaping and trees must be native to East Tennessee. Native plants are better suited to the local environment and are superior to non-native plants for soil stabilization. It is also recommended that rain gardens be utilized, where feasible, in any areas with natural storm water conveyances, to decrease the flow of water and encourage absorption. |
| Hazards and Nuisances including Site Safety and Site-Generated Noise | 3 | The site will not located within a high hazard area including that of volcanoes, landslides, or wildfires. The site is not located within any heavy industry, incinerator, power generating plant, or pollution generators. Pollution from local tailpipes is possible in the area. The site has the current noise levels of 55-74 decibels predicted during all the phases of the Westside Evolves project.  | Noise from Highway 27 would be reduced due to better building codes versus the ones used for the original structure, building noise barriers, or increasing vegetation planned for the development would also reduce ambient noise. No new sources of air pollution would come of the preferred Alternative. Noise mitigation can be mitigated for using light-frame construction materials and storm windows. Noise from Highway 27 would be reduced by using better building codes and materials, building noise barriers, and increasing vegetation planned for the development would also reduce ambient noise. |
| **SOCIOECONOMIC** |
| Employment and Income Patterns | 1 | Current employment and income levels for Westside residents are below levels for other city and county residents. The $11,968 median income in Westside is almost four times lower than the $43,964 median income of Chattanooga. It should be noted that nearly all residents in Gateway Tower are 65 years of age or older, are mostly unemployed, and living on a fixed income. The unemployment rate for Westside residents is significantly higher than the 5% unemployment rate for Chattanooga, averaging 34%,. As noted above, the high percentage of people over the age of 65 is contributing to the high unemployment rate. Implementing the Westside Plan will create job opportunities in the construction industry and supporting services. Once construction is completed, additional employment will be needed for maintenance of the residences and common areas. To enhance job opportunities, the project may consider a mentorship program to help local individuals acquire construction job skills. |   |
| Demographic Character Changes / Displacement | 1 | Westside is a mostly minority community. All existing and proposed new units are public housing so home ownership is not a factor in the Plan. The Westside Plan will provide new housing for approximately 2,000 people. No resident will be displaced because the project will build now residences before old residences are demolished. This way all residents that want to remain in Westside will not be without housing. When fully constructed, 1783 units will replace the existing 629 units. The goal of the Phase l is to create a mixed-income community.  | The project will implement a ''build-first'' model in order to limit the displacement of the residents and reduce the likelihood of native residents leaving the area permanently. |
| Environmental Justice EA Factor | 1 | The Preferred Alternative's intent is to improve conditions for the recognized minority and low-income population in Westside. In addition to new housing, there will be improved access to health care, transportation, childcare, and related social services. Implementing the plan will also reduce exposure to natural and man-made hazards by providing housing that meets current building codes. However, the impact of noise and pollutants from the heavily travelled US 27 will only be minorly improved.  | Environmental Justice issues will be addressed by completing all mitigating measures outlined in this section. These measures will address issues such as education, site contamination, noise, air pollution, storm water issues, and dilapidated housing. This project, if successful will turn the Westside into a neighborhood of choice for the current residents and will bring in more income diversity into the area. |
| **COMMUNITY FACILITIES AND SERVICES** |
| Educational and Cultural Facilities (Access and Capacity) | 1 | The Preferred Alternative currently has three schools; elementary, middle, and high school for the area. The area also has various public and private childcare centers. Within the Preferred Alternative's site boundaries, the Youth and Family Development and offers Early Head Start and Head Start to children. The Preferred Alternative has the potential to affect historic properties. No historic properties are within the site boundaries.  | Rehabilitation of the James A. Henry site will result in an education and community hub that will provide Head Start Early Learning seats and a community health clinic. The cultural and historical significance of the Westside will be preserved through visual and written records that will be accessible by the community and will be displayed in the community hub.  |
| Commercial Facilities (Access and Proximity) | 1 | The Preferred Alternative is in a mostly 70 percent High Density Residential, with various vacant commercial spaces located throughout the area. The closest grocery store is located 3 miles away, The Renaissance Presbyterian Church in in the Westside area, and one bank is located within walking distance to the Preferred Alternative. Future Development plans call for four of the planned buildings to be mixed-used retail/multi-family. A new grocery store is planned for the area as well. |   |
| Health Care / Social Services (Access and Capacity) | 1 | Currently there are very few medical care facilities available for the Preferred Alternative. They include the AIM Center, a Mental Health Consortium at Dogwood Manor, and the CHI Memorial Center for Health Aging at Boynton Terrace only available to residents. Most of the residents utilize the Erlanger Medical Center or Urgent Care. The Westside Plan aims to increase the quality of life be offering high-quality health care and social services for the area. Expansion of the Boynton Terrance Clinic and having health care in the James A. Henry Building or in the onsite Riverview Tower and Mary Walker Towers.  |   |
| Solid Waste Disposal and Recycling (Feasibility and Capacity) | 3 | A Phase I and a Phase II was performed on the Preferred Alternative site. The Phase I identified potential foundry in the area as a recognized environmental condition. The Phase II identified the Asbestos sampling was conducted at Gateway towers, James A. Henry School, and the Youth and Family Services Building. Each building was identified as having asbestos containing materials. Garbage collection services is provided to residents through the City's Department of Public Works. Typical Demolition debris can be disposed of at the Birchwood II C&D Landfill.  | Impacted soil will either be removed and disposed of property, or sealed under the foundation of the new buildings. All Asbestos materials identified will be properly disposed of to the Bradley County Landfill and within EPA guidelines.  |
| Waste Water and Sanitary Sewers (Feasibility and Capacity) | 3 | The Waste Resources Division of the City of Chattanooga is responsible for the operation and maintenance of the interceptor sewer system of Chattanooga, as well as the regional wastewater treatment plant known as the Moccasin Bend Wastewater Treatment Plant. The City's Interceptor Sewer System serves the city and the surrounding metropolitan area. The interceptor sewer system encompasses approximately 1,263 miles of sewer lines, 7 large custom-built pumping stations, 8 custom-built storm stations, 53 underground, wet well mounted, submersible pumping stations, approximately 171 residential/grinder stations, 8 combined sewer overflow (CSO) facilities, and 1 major regional wastewater treatment plant (Moccasin Bend). Currently the study area is served by the existing sanitary sewer system. Increase in population density once the Westside project has been completed is expected to increase the sewage usage.  | The current water supply and wastewater system are large enough to accommodate the slight increase in population to the Westside. All newly constructed residential and commercial housing will utilize water conserving appliances, toilets, and fixtures. The addition of more greenspaces and the use of permeable surfaces must be used to reduce rain runoff into the storm water system. Per the requirements of the Chattanooga's Consent Decree with EPA (April 24, 2013) and City's RainSmart program, which aims to increase water quality and reduce runoff, all new landscaping and trees must be native to East Tennessee. Native plants are better suited to the local environment and are superior to non-native plants for soil stabilization. It is also recommended that rain gardens be utilized, where feasible, in any areas with natural storm water conveyances, to decrease the flow of water and encourage absorption. |
| Water Supply (Feasibility and Capacity) | 3 | The Tennessee American Water Citico Water Treatment Plant located in Chattanooga, Tennessee, draws surface water from the Tennessee River. The study area is served by a public water supply provided by Tennessee American Water and treated at the Citico Water Treatment Plant. The average amount of water served to customers is 40 MGD. According to the Tennessee Valley Association (TVA), almost 5.2 million people rely on the Tennessee River and its tributaries, the nation's fifth largest river system, for drinking water In 2020 an average of 8.3 billion gallons of water were withdrawn daily from the Tennessee River Watershed and 95 percent of that water was returned back to the river system. Industrial and municipal supply are the second and third largest water use sources, returning 94 percent and 75 percent respectively. According to the EPA Enforcement and Compliance History Database, tap water for the City of Chattanooga was in compliance with the federal health-based drinking water standards. It should be noted that a total of nine contaminates have been detected in the water system though. | The current water supply and wastewater system are large enough to accommodate the slight increase in population to the Westside. All newly constructed residential and commercial housing will utilize water conserving appliances, toilets, and fixtures. The addition of more greenspaces and the use of permeable surfaces must be used to reduce rain runoff into the stormwater system. Per the requirements of the Chattanooga's Consent Decree with EPA (April 24, 2013) and City's RainSmart program, which aims to increase water quality and reduce runoff, all new landscaping and trees must be native to East Tennessee. Native plants are better suited to the local environment and are superior to non-native plants for soil stabilization. It is also recommended that rain gardens be utilized, where feasible, in any areas with natural stormwater conveyances, to decrease the flow of water and encourage absorption. While the current tap water is considered in compliance with the federal - health based drinking water standards, the CHA wants to ensure that all residents in the Westside community have access to clean, healthy drinking water. Mitigation for the contaminates will include installing either osmosis systems, or filters in all buildings, whichever is deemed appropriate at the time of construction. |
| Public Safety - Police, Fire and Emergency Medical | 3 | Police services are covered by the City of Chattanooga Police Department. The Police Department stated that their average response time to the study area is 9:41, with about 21 percent of response times within 5 minutes. Fire services are provided by the Chattanooga Fire Department, with the study area being served by Station Number 1. With climate change contributing to a greater wildfire risk, adequate response time and a well-equipped fire department are important to address that concern. For new construction, the City of Chattanooga has adopted the International Fire Code. For state buildings, educational occupancies, and all other existing buildings, except 1- and 2-family dwellings, the City has adopted the NFPA Life Safety Code. Fire hydrants exist within the study area and are planned for the updated community as well. Emergency Medical Services are provided by Hamilton County EMS with the study area being served by Medic Station Number 9. The closest hospital is Erlanger which is approximately two miles to the northeast of the study area. The closest walk-in medical clinic is Erlanger Express Care Lifestyle Center located approximately one mile to the northeast of the study area.  | Standard construction site practices such as establishing and maintaining health and safety plans to comply with OSHA regulations. These plans may include the use of personal protective equipment, regular safety inspections, use of equipment guards, and establishment of emergency shutdown procedures. SPCC plans would be developed to mitigate any spills during construction. Communication of increased industrial traffic and establishment of traffic procedures to minimize potential safety concerns will be relayed to the City and County to improve public safety. Increased police activity, the plan includes better access for emergency vehicles by updating the roadways and constructing new residential buildings. The buildings will be updated with the latest emergency equipment including but not limited to smoke detectors, fire suppressant systems, emergency exits. |
| Parks, Open Space and Recreation (Access and Capacity) | 1 | Green spaces are abundant throughout the study area but currently underutilized. Sheila Jennings Park is centrally located within the study area but has not been properly programmed and lacks shade and shelters. Small pocket parks are spread throughout the study area that residents within close proximity use for gardening and visiting with neighbors. The topography creates a challenge for residents to move north/south and east/west. The western wooded bluff acts as a buffer and barrier between commercial zones on Riverfront Parkway and the residents within the Westside.  |   |
| Transportation and Accessibility (Access and Capacity) | 1 | The Chattanooga Area Regional Transportation Authority (CARTA) has 19 bus routes that stretch from North Chattanooga to the Tennessee-Georgia border and east to Ooltewah, Tennessee. CARTA Bus Route 21 runs through the study area and requires transfers for commuters resulting in long commute times. The study area lacks bus shelters and disability transportation options. There are currently nine bus stops in the study area  |   |
| **NATURAL FEATURES** |
| Unique Natural Features /Water Resources | 1 | The study area is entirely urbanized and consists of residential, commercial, and industrial developments. Landscaped grass and trees are present throughout the study area which provide groundwater recharge and help control stormwater runoff. Fragmented strips of woodland consisting of trees and shrubs are located throughout. The site is not currently subject to rapid water withdrawal problems that could negatively affect the water table or aquifers and currently utilizes public water and sewer. Impervious services are found readily throughout the study area. | Permeable surfaces will be placed throughout the project area and improve the area through landscaping techniques and community spaces to reduce runoff into the Tennessee River. |
| Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.) | 3 | Fourteen species were listed as potentially present within the study area per the USFWS's IPaC system. TDEC's Rare Species identified 26 species within the project area. Fourteen migratory bird species have the potential to be within the study area. Game fish are not likely to be affected. Invasive species  | There is the potential for migratory bats to roost in abandoned buildings in the project area. Bat surveys will be continually updated as the project progresses to ensure no bat encroachment occurred in previously cleared abandoned buildings. |
| Other Factors 1 |   |   |   |
| Other Factors 2 |   |   |   |
| **CLIMATE AND ENERGY** |
| Climate Change | 1 | Air Quality will be improved with the new infrastructure and will increase the quality of life. There will be an increase in the overall population density of the Westside Community. | New infrastructure will reduce Greenhouse gasses as well as planting vegetation, especially trees for carbon filtration. This will also reduce the heat-dome for that area and use less emissions. In addition, all new construction of residential and commercial spaces must incorporate energy efficient construction, appliances, and fixtures. Please refer to the EA Body for the Climate Change Chapter 7. |
| Energy Efficiency | 1 | The current buildings will be demolished and replaced with newer energy efficient buildings and appliances and will use the Green Building Standards to improve the carbon emissions. | All new construction of residential and commercial spaces must incorporate energy efficient construction, appliances, and fixtures. |

**Supporting documentation**

[Westside Redevelopment - Consulting-Parties-Invitation.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011999398)

[Tribal Consultation Letters Sent(1).pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011999397)

[Section 106 MOU ACHP Map(1).pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011999396)

[Memorandum of Agreement - CHA-City signed - 2272023\_SHPO signature(1).pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011999395)

[Biological Assessment 2023-10-02(1).pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011999394)

[3-IPaC\_ Species\_List(1).pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011999393)

[2-USGS\_WebSoilSurvey\_Map(1).pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011999390)

[1b-USFWS Agency Consultation Letter- Government Agencies\_FINAL\_2022-11-21.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011999389)

[1aFWS (NEW) Clearance Letter - March 2022 (3).pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011999387)

[Air Pollution Control Bureau email(1).pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011999382)

[4- Air Pollution Coordination(1).pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011999381)

[2-Non-Attainment List of Tennessee(1).pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011999380)

[EA Body\_January 12 2024(2).pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011999375)

[4- Airports within 15 miles.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011999373)

[CHA EA Contact List.xlsx](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011999371)

[JAMES A HENRY CAMPUS HUB-PHASE I-08-31-2023.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011999361)

[FINAL\_WESTSIDE PLAN-pages (5).pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011999360)

[8-Appendix A Phasing Exhibits 12132023(2).pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011999354)

**Additional Studies Performed:**

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| --- |
| College Hill Courts: Phase 1, Phase 2, Soil Screening Gateway Towers: Asbestos Survey, Soil Screening, Phase 1, Phase 2, Radon Screening, Lead Assessment Youth and Family Center: Asbestos Survey, Lead Assessment, Phase 1, Phase 2, Radon Screening, Soil Screening James A Henry School: Asbestos Survey, Lead Assessment, Phase 1, Phase 2, Soil Screening Sheila Jennings Center and Park: Phase 1, Phase 2 |

|  |  |
| --- | --- |
| **Field Inspection [Optional]:** Date and completed by: |  |
| Amanda Pagels | 4/20/2023 12:00:00 AM |

[7-PhotoSummary docx.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011775606)

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

|  |
| --- |
| Please see the attached Contact list[CHA EA Contact List(1).xlsx](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011999399) |

**List of Permits Obtained:**

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

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| The FONSI notice was disseminated to the following: Chattanooga Times Free Press City of Chattanooga Facebook Page City of Chattanooga website Chattanooga Housing Authority Chattanooga-Hamilton County Regional Planning agency Westside Community Center College Hill Courts Gateway Towers  |

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

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| --- |
| The cumulative Impacts for the Westside Evolves Transformation project would result in individually minor impacts and improvements but overall, significantly positive. The current state of the Westside Community is deteriorating. The lack of housing and the lack of affordable housing throughout the City of Chattanooga is having a negative effect on the city's residents. By improving this unique and historic community, this allows the City of Chattanooga to continue to grow and thrive for future generations. |

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

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| --- |
| Alternative 2, also known as the Preferred Alternative, is to build on the open/vacant lots of the City owned property, move the current residents into it, and then demolish the current buildings. Once that is complete, the areas with the demolished buildings will be replaced by new construction multi-family dwellings. The Preferred Alternative will proceed as a ''build-first'' approach to pursue a maximum number of one-way moves. This approach will not only benefit the residents but will also reduce the final cost by not incurring relocation costs. Alternative 3 was to renovate the buildings and sites that are at the locations currently including the private buildings when that phase occurs. Renovations would be costly and would require relocation of the residents. Multiple relocations add stress on the residents and cause problems in an area already lacking housing options. The aging buildings are not cost efficient for both the residents and CHA. Keeping up with the upkeep does not improve the lives of the residents and would not be cost-effective for anyone. This alternative was eliminated from detailed analysis. Alternative 4 was to demolish the current buildings around the Westside, relocate the current residents, and move them back in. This option would require all residents to be relocated and then moved back into the new, completed housing units. This would not follow the ''build first'' approach, causing more stress on the residents and community. This alternative would not be best suited for the community and therefore was eliminated from detailed analysis. |

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

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| Alternative 1 was the No Action Alternative. This Alternative would not change or update any aspect of the Westside, including renovations, demolition, or expansion. The current state of the buildings would be left as outdated and potentially hazardous. |

**Summary of Findings and Conclusions:**

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| --- |
| The Westside has historically been neglected with regards to redevelopment efforts. As a result, residents of the Westside have suffered with regards to deteriorating housing, health, and overall livability. The lack of affordable housing throughout the City of Chattanooga is having a negative effect on the city's residents. By improving this unique and historic community, this allows the City of Chattanooga to continue to grow and thrive for future generations. With this in mind, the No Action Alternative is not a viable option if we wish to provide Westside residents with a desirable and livable City, and improve their quality of life. Utilizing Alternative 2, the cumulative Impacts for the Westside Evolves Transformation project would require mitigation in several areas to counter localized issues, but the minor impacts would overall be significantly positive. Alternative 2 will also result in the least adverse effects on Environmental Justice. Mitigation requirements are summarized in the HEROS system due to character limits for narratives, but are detailed in the formal Environmental Clearance Letter attached. Mitigation is required in the areas of Site Contamination, Explosives, Historic Preservation, Noise Abatement, Soil Suitability , Relocation, Hazards, Education, Solid Waste, Waste Water/Storm Water/Water Resources, Public Safety, Wildlife/Vegetation, and Climate Change. It is the opinion of the City of Chattanooga and the Chattanooga Housing Authority, that Alternative 2 is the most viable option for the Westside Evolves project.  |

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

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

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Law, Authority, or Factor** | **Mitigation Measure or Condition** | **Comments on Completed Measures** | **Mitigation Plan** | **Complete** |
| Historic Preservation | All stipulations will be met within the next year. | N/A |   |   |
| Contamination and Toxic Substances | Brownfield agreement with the state for the Foundry Sands found throughout the Westside . Approval is currently pending.Asbestos will be mitigated for and disposed of properly using methods from the Hamilton County Air Pollution Bureau and the EPA standards. | N/A |   |   |
| Explosive and Flammable Hazards | An above ground fuel storage tank was found within the Westside Evolves project area at Gateway Towers. CHA will work with the local Fire Department at the time of removal of the fuel tank to ensure proper removal and disposal of all materials and liquids. All tanks outside of the Westside Evolves project area are within compliance and no mitigation is needed for those. | N/A |   |   |
| Noise Abatement and Control | Please refer to the HUD Noise study for more information on noise impacts throughout the Westside. Mitigation for noise will include strategies to achieve ''acceptable noise levels'' will include:\*tInterior Noise Penetration: In instances where there is higher than average outside noise disturbances, we will incorporate various strategies to mitigate interior noise penetration, using upgraded STC windows , using Mass loaded vinyl between the studs and the drywall, adding sound clips between the studs and the drywall, adding continuous rigid insulation to the exterior, or reducing window penetrations on the offending facades. We usually take a layered approach in order to find the best solution for each building facade that requires sound mitigation.\*tThe Lawn (south): The ground floor in this area is commercial and will be the center of commerce for the community as well as a major transit hub. The need for strong security and visibility at this location is essential for securing a safe environment, therefore, some traditional outdoor sound mitigation strategies will not be congruent with the security goal. The current noise mitigation strategies incorporated into the plan include providing layered landscaping along that frontage with street trees, shrubbery and ornamental trees. Additionally, noise is mitigated by the proposed bus shelter facility on Main Street and the attached transit shade structure. Th\*tOutdoor Seating (south / middle): These areas are intended for outdoor sidewalk cafe dining adjacent to the public sidewalk abutting Main Street. It is intended to have a high level of activity and is surrounded by ground floor retail. Noise mitigation may be provided through street trees and additional landscaping along the back of sidewalk. | N/A |   |   |
| Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff | Best management practices would be utilized to prevent erosion and drainage and storm water runoff. All storm water inlets must be covered to prevent construction debris from entering the storm water system. All slopes will be in accordance with the industry standards. Impacted soil will either be removed and disposed of property or sealed under the foundation of the new buildings. A Brownfield Agreement with the State of Tennessee would be implemented to ensure contaminated soil is not disturbed in a way that would harm human health. The current water supply and wastewater system are large enough to accommodate the slight increase in population to the Westside. All newly constructed residential and commercial housing will utilize water conserving appliances, toilets, and fixtures. The addition of more greenspaces and the use of permeable surfaces must be used to reduce rain runoff into the storm water system. Per the requirements of the Chattanooga's Consent Decree with EPA (April 24, 2013) and City's RainSmart program, which aims to increase water quality and reduce runoff, all new landscaping and trees must be native to East Tennessee. Native plants are better suited to the local environment and are superior to non-native plants for soil stabilization. It is also recommended that rain gardens be utilized, where feasible, in any areas with natural storm water conveyances, to decrease the flow of water and encourage absorption. | N/A | Best management practices would be utilized to prevent erosion and drainage and storm water runoff. All stormwater inlets must be covered to prevent construction debris from entering the stormwater system. All slopes will be in accordance with the industry standards. Impacted soil will either be removed and disposed of property or sealed under the foundation of the new buildings. A Brownfield Agreement with the State of Tennessee would be implemented to ensure contaminated soil is not disturbed in a way that would harm human health. See formal Environmental Clearance letter for full mitigation language. |   |
| Hazards and Nuisances including Site Safety and Site-Generated Noise | Noise from Highway 27 would be reduced due to better building codes versus the ones used for the original structure, building noise barriers, or increasing vegetation planned for the development would also reduce ambient noise. No new sources of air pollution would come of the preferred Alternative. Noise mitigation can be mitigated for using light-frame construction materials and storm windows. Noise from Highway 27 would be reduced by using better building codes and materials, building noise barriers, and increasing vegetation planned for the development would also reduce ambient noise. | N/A | Noise from Highway 27 would be reduced by using better building codes and materials, building noise barriers, and increasing vegetation planned for the development would also reduce ambient noise. See formal Environmental Clearance letter for full mitigation language. |   |
| Demographic Character Changes / Displacement | The project will implement a ''build-first'' model in order to limit the displacement of the residents and reduce the likelihood of native residents leaving the area permanently. | N/A | The project will implement a ''build-first'' model in order to limit the displacement of the residents and reduce the likelihood of native residents leaving the area permanently. See formal Environmental Clearance letter for full mitigation language. |   |
| Environmental Justice EA Factor | Environmental Justice issues will be addressed by completing all mitigating measures outlined in this section. These measures will address issues such as education, site contamination, noise, air pollution, storm water issues, and dilapidated housing. This project, if successful will turn the Westside into a neighborhood of choice for the current residents and will bring in more income diversity into the area. | N/A |   |   |
| Educational and Cultural Facilities (Access and Capacity) | Rehabilitation of the James A. Henry site will result in an education and community hub that will provide Head Start Early Learning seats and a community health clinic. The cultural and historical significance of the Westside will be preserved through visual and written records that will be accessible by the community and will be displayed in the community hub.  | N/A | Rehabilitation of the James A. Henry into an education and community center will provide adequate childcare and education services for the community. The site will be home to critical Head Start seats needed for the City to retain critical Head Start funding. See formal Environmental Clearance letter for full mitigation language. |   |
| Solid Waste Disposal and Recycling (Feasibility and Capacity) | Impacted soil will either be removed and disposed of property, or sealed under the foundation of the new buildings. All Asbestos materials identified will be properly disposed of to the Bradley County Landfill and within EPA guidelines.  | N/A | A brownfield agreement will be established for the project to address the removal of contaminated soil. All demolition debris will be discarded at the Birchwood II C&D Landfill. All Asbestos materials identified must be properly disposed of to the Bradley County Landfill and within EPA guidelines and through the Hamilton County Air Pollution Control Bureau requirements. See formal Environmental Clearance letter for full mitigation language. |   |
| Waste Water and Sanitary Sewers (Feasibility and Capacity) | The current water supply and wastewater system are large enough to accommodate the slight increase in population to the Westside. All newly constructed residential and commercial housing will utilize water conserving appliances, toilets, and fixtures. The addition of more greenspaces and the use of permeable surfaces must be used to reduce rain runoff into the storm water system. Per the requirements of the Chattanooga's Consent Decree with EPA (April 24, 2013) and City's RainSmart program, which aims to increase water quality and reduce runoff, all new landscaping and trees must be native to East Tennessee. Native plants are better suited to the local environment and are superior to non-native plants for soil stabilization. It is also recommended that rain gardens be utilized, where feasible, in any areas with natural storm water conveyances, to decrease the flow of water and encourage absorption. | N/A | The current water supply and wastewater system are large enough to accommodate the slight increase in population to the Westside. All newly constructed residential and commercial housing will utilize water conserving appliances, toilets, and fixtures. The addition of more greenspaces and the use of permeable surfaces must be used to reduce rain runoff into the stormwater system. See formal Environmental Clearance letter for full mitigation language. |   |
| Water Supply (Feasibility and Capacity) | The current water supply and wastewater system are large enough to accommodate the slight increase in population to the Westside. All newly constructed residential and commercial housing will utilize water conserving appliances, toilets, and fixtures. The addition of more greenspaces and the use of permeable surfaces must be used to reduce rain runoff into the stormwater system. Per the requirements of the Chattanooga's Consent Decree with EPA (April 24, 2013) and City's RainSmart program, which aims to increase water quality and reduce runoff, all new landscaping and trees must be native to East Tennessee. Native plants are better suited to the local environment and are superior to non-native plants for soil stabilization. It is also recommended that rain gardens be utilized, where feasible, in any areas with natural stormwater conveyances, to decrease the flow of water and encourage absorption. While the current tap water is considered in compliance with the federal - health based drinking water standards, the CHA wants to ensure that all residents in the Westside community have access to clean, healthy drinking water. Mitigation for the contaminates will include installing either osmosis systems, or filters in all buildings, whichever is deemed appropriate at the time of construction. | N/A | The current water supply and wastewater system are large enough to accommodate the slight increase in population to the Westside. All newly constructed residential and commercial housing will utilize water conserving appliances, toilets, and fixtures. The addition of more greenspaces and the use of permeable surfaces must be used to reduce rain runoff into the stormwater system. See formal Environmental Clearance letter for full mitigation language. |   |
| Public Safety - Police, Fire and Emergency Medical | Standard construction site practices such as establishing and maintaining health and safety plans to comply with OSHA regulations. These plans may include the use of personal protective equipment, regular safety inspections, use of equipment guards, and establishment of emergency shutdown procedures. SPCC plans would be developed to mitigate any spills during construction. Communication of increased industrial traffic and establishment of traffic procedures to minimize potential safety concerns will be relayed to the City and County to improve public safety. Increased police activity, the plan includes better access for emergency vehicles by updating the roadways and constructing new residential buildings. The buildings will be updated with the latest emergency equipment including but not limited to smoke detectors, fire suppressant systems, emergency exits. | N/A |   |   |
| Unique Natural Features /Water Resources | Permeable surfaces will be placed throughout the project area and improve the area through landscaping techniques and community spaces to reduce runoff into the Tennessee River. | N/A | Permeable surfaces will be placed throughout the project area and improve the area through landscaping techniques and community spaces to reduce runoff into the Tennessee River. See formal Environmental Clearance letter for full mitigation language. |   |
| Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.) | There is the potential for migratory bats to roost in abandoned buildings in the project area. Bat surveys will be continually updated as the project progresses to ensure no bat encroachment occurred in previously cleared abandoned buildings. | N/A | There is the potential for migratory bats to roost in abandoned buildings in the project area. Bat surveys will be continually updated as the project progresses to ensure no bat encroachment occurred in previously cleared abandoned buildings. A minimum of twenty percent of the new trees that are planted in the project area should include native bat-friendly trees, such as Shag Bark Oak and other native oak trees. Landscaping should include food sources for bats including, Purple Coneflower (Echinacea purpurea), Goldenrod (Solidago sp.), Yarrow (Achillea millefolium), Native Salvia/Sage (Salvia sp.), Yucca (Hesperaloe sp.), and Sunflower (Helianthus sp.). See formal Environmental Clearance letter for full mitigation language. |   |
| Climate Change | New infrastructure will reduce Greenhouse gasses as well as planting vegetation, especially trees for carbon filtration. This will also reduce the heat-dome for that area and use less emissions. In addition, all new construction of residential and commercial spaces must incorporate energy efficient construction, appliances, and fixtures. Please refer to the EA Body for the Climate Change Chapter 7. | N/A | In addition to the utilization of green infrastructure to reduce carbon dioxide and pollutants in the air and alleviate the ''heat dome'' phenomenon, all new construction of residential and commercial spaces must incorporate energy efficient construction, appliances, and fixtures. See formal Environmental Clearance letter for full mitigation language. |   |
| Energy Efficiency | All new construction of residential and commercial spaces must incorporate energy efficient construction, appliances, and fixtures. | N/A |   |   |

**Project Mitigation Plan**

|  |
| --- |
| The City of Chattanooga, with the assistance of the Chattanooga Housing Authority, will be the monitoring agency for all mitigation measures. In the interest of maintaining the integrity and accuracy of this environmental review, the CHA must appoint one person to meet, at minimum, monthly with the appointed staff member in the HCI office. This meeting will be for the purpose of updating HCI staff of changes and finalizations to Westside activities related to the CNI grant. All required mitigation documentation must be forwarded to the City of Chattanooga and the related governing agency. |

**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 location is approximaly 6.1 miles west of the Chattanooga Metropolitan Airport and is not located within a Clear Zone or Accidental Potential Zone. A map of the proposed location relative to the location of the Chattanooga Metropolitan Airport is provided within Appendix B of the EA. Therefore, no impact is anticipated as a result of the Preferred Alternative. The project is in compliance with Airport Hazards requirements. Please refer section 3.4.3 of the EA on Airport Hazards. |

**Supporting documentation**

[2- Airport Hazards.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011804897)

[1-Airport-Hazards-Partner-Worksheet.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011804896)

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

|  |  |
| --- | --- |
|  | Yes |
| ✓ | No |

**Coastal Barrier Resources**

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

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

**Compliance Determination**

|  |
| --- |
| The study area is located within a developed mixed-use area of residential, commercial, and industrial properties bound by Main Street, Riverfront Parkway, Highway 27, and MLK Boulevard within the City of Chattanooga and is located approximately 0.25 miles east of the Tennessee River within the Upper Nickajack Lake - Tennessee River watershed. The study area is separated from the Tennessee River by a highly industrialized section of urbanized land. The study area is not in a coastal zone; thus, this resource is not applicable to this assessment. Please refer to Section 6.6 of the EA for Coastal Barriers. This project is in compliance with the Coastal Barrier Resources Act. |

**Supporting documentation**

[2-Coastal Barrier Zones Map.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011805030)

[1-Coastal-Zone-Management-Act-Partner-Worksheet.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011805029)

**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 |

**4. While flood insurance is not mandatory for this project, HUD strongly recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). Will flood insurance be required as a mitigation measure or condition?**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
|

|  |  |
| --- | --- |
|  | Yes |
| ✓ | No |

 |  |

**Screen Summary**

**Compliance Determination**

|  |
| --- |
| 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. Please refer to Sections 3.6 and 7.3 of the EA pertaining to Flooding and Flood Insurance Prior to the construction of the Chickamauga Dam, Chattanooga was Tennessee Valley's most flood-prone city. Serious flooding damage was suffered during 1867, 1875, 1886, and 1917. The construction of the Chickamauga Dam reservoir system in 1936 along with other reservoirs on the Tennessee River and its tributaries have provided flood control to the city since and prevented nearly $5 billion in flood damage in the City of Chattanooga alone (Tennessee Valley Authority, 2023). Although the study area is located approximately 0.25 miles west of the Tennessee River, it is not located within a floodway or special flood hazard area of the river. The entirety of the study area is located within Zone X, an area of minimal flood hazard. The Westside Project is not located within a floodway or special flood zone of the Tennessee River. The entirety of the study area is located within Zone X, an area of minimal flood hazard. Therefore, flood plain management and flood insurance would not be a concern under the No Action Alternative or the Preferred Alternative. The climate continues to change, and storms and weather events are getting stronger. Floods, fires, heat, droughts, and hurricanes are all increasing in strength and intensity. Human activities can significantly impact the natural functioning of ecosystems. In particular, land management can contribute to natural hazards such as floods and droughts by removing vegetation that helps absorb water and replacing it with impervious surfaces that increase the quantity and speed of water runoff during precipitation events. The Preferred Alternative would consider these changes and would construct buildings to withstand the ever-changing climate. New construction would use the most current building materials to ensure the buildings and structures can withstand or mitigate any natural hazard that could occur in the site location. Therefore, only minor adverse impacts are anticipated as a result of implementation of the Preferred Alternative  |

**Supporting documentation**

[Flood-Insurance-Worksheet.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011999401)

[Full\_FIRM\_225bc823-6ad0-41a9-835f-ec33299fd92b(2).pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011844721)

**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):  |

**Screen Summary**

**Compliance Determination**

|  |
| --- |
| The project's county or air quality management district is in attainment status for all criteria pollutants. The project is in compliance with the Clean Air Act. Please Refer to Section 3.4, 6.5.2, and 7.1 of the EA pertaining to Air Quality. CHA contacted the Air Pollution Control Bureau of Hamilton County for any compliance needs. The Westside is surrounded by a mix of residential and commercial development. Additionally, the community is bounded by heavily traveled US 27. There is no significant heavy industry, incinerator, power generating plant, or other air pollution generators near the Westside. However, there is some degree of air pollution threat for the Westside that comes from tailpipe emissions from vehicles using the roads within and surrounding the Westside. While the Preferred Alternative is located in an air quality attainment area, the National Ambient Air Quality Standards (NAAQS) assessment does not provide data specifically for the Westside. Given the existing roads, there is a chance that an air pollution issue exists in the Westside. Climate change can affect indoor and outdoor air quality. Changes in weather conditions, including temperature and precipitation, can increase ground-level ozone and particulate matter such as windblown dust and smoke from wildfires. Exposure to these pollutants can lead to or worsen health problems, such as respiratory illness and heart diseases. Mold, bacteria, and other indoor pollutants may increase as climate-related precipitation and storms increase. For example, flood damage from increased strong storms can create a damp indoor environment, leading to mold growth. Climate change has also led to longer and more frequent wildfires. Exposure to wildfire smoke can worsen respiratory illnesses, such as asthma, chronic obstructive pulmonary disease (COPD), and bronchitis. The Preferred Alternative considers the aging infrastructure community and community segregation and how climate change is affecting current and future planning for the site. The Clean Air Act (CAA) of 1970 establishes standards and regulates air emissions from stationary and mobile sources. This law authorizes EPA to establish NAAQS to protect public health and public welfare and to regulate emissions of hazardous air pollutants. Geographic areas that are in compliance with standards are called ''attainment areas,'' while areas that do not meet standards are called ''nonattainment'' areas. The Preferred Alternative is in an attainment area. Currently, only one county, Sullivan County, is listed as non-attainment in the state of Tennessee. Implementation of the No Action Alternative would not result in air quality changes. Since the study area is located within an attainment area, no adverse impacts would be anticipated as a result of the study area remaining the same. The Preferred Alternative proposes the establishment of greenspaces throughout the project. Vegetation, trees specifically, are natural pollutant filters. Trees can remove as much as 15 percent of the ozone layer, 14 percent of the sulfur dioxide (SO2), 8 percent of the nitrogen dioxide (NO2), and 0.05 percent of the carbon monoxide (CO) from the air. They also produce shade and reduce energy demand, indirectly contributing to improved air quality. The Preferred Alternative proposes to construct new housing which in turn will increase air quality and overall public health. New modern construction is efficient in keeping up with the ever-changing climate by keeping moisture and outdoor pollutants out. Modern HVAC systems are also more efficient in filtering out harmful pollutants. Due to the further improvements of air quality within the study area as a result of implementing the Preferred Alternative, a minor beneficial impact to air quality is anticipated as a result.  |

**Supporting documentation**

[Air Pollution Control Bureau email.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011888820)

[4- Air Pollution Coordination.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011854119)

[2-Non-Attainment List of Tennessee.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011805051)

[3-Chattanooga Westside Evolves -Master Developer RFP - Copy.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011805050)

[1-Air-Quality-Partner-Worksheet (1).pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011805047)

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

|  |  |
| --- | --- |
| ✓ | Yes |
|  | No |

**Coastal Zone Management Act**

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

**This project is located in a state that does not participate in the Coastal Zone Management Program. Therefore, this project is in compliance with the Coastal Zone Management Act.**

**Screen Summary**

**Compliance Determination**

|  |
| --- |
| This project is located in a state that does not participate in the Coastal Zone Management Program. Therefore, this project is in compliance with the Coastal Zone Management Act. Please refer to Section 6.6 of the EA pertaining to Coastal Zones The study area is located within a developed mixed-use area of residential, commercial, and industrial properties bound by Main Street, Riverfront Parkway, Highway 27, and MLK Boulevard within the City of Chattanooga and is located approximately 0.25 miles east of the Tennessee River within the Upper Nickajack Lake - Tennessee River watershed. The study area is separated from the Tennessee River by a highly industrialized section of urbanized land. The study area is not in a coastal zone; thus, this resource is not applicable to this assessment.  |

**Supporting documentation**

[2-Coastal Barrier Zones Map(1).pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011888834)

[1-Coastal-Zone-Management-Act-Partner-Worksheet(1).pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011888833)

**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 |

|  |  |
| --- | --- |
| ✓ | Yes |

**3. Mitigation**

Document and upload 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. |

|  |  |
| --- | --- |
| ✓ | Yes, adverse environmental impacts can be eliminated through mitigation. Document and upload all mitigation requirements below.  |

**4. Describe how compliance was achieved in the text box below. Include any of the following that apply: State Voluntary Clean-up Program, a No Further Action letter, use of engineering controls, or use of institutional controls.**

|  |
| --- |
| Brownfield agreement with the state for the Foundry Sands found throughout the Westside . Approval is currently pending.

 Asbestos will be mitigated for and disposed of properly using methods from the Hamilton County Air Pollution Bureau and the EPA standards.  |

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

|  |  |
| --- | --- |
|  | Complete removal  |
| ✓ | Risk-based corrective action (RBCA)  |

**Screen Summary**

**Compliance Determination**

|  |
| --- |
| Site contamination was evaluated as follows: ASTM Phase I ESA, ASTM Phase II ESA, Remediation or clean-up plan. On-site or nearby toxic and hazardous materials were found. The adverse environmental impacts can be mitigated. With mitigation, identified in the mitigation section of this review, the project will be in compliance with contamination and toxic substances requirements. Please Refer to Section 5.5 of the EA Body pertaining to Contamination and Toxic Substances A Phase I and a Phase II was performed on the Preferred Alternative site. The Phase I identified potential foundry in the area as a recognized environmental condition. The Phase II identified the Asbestos sampling was conducted at Gateway towers, James A. Henry School, and the Youth and Family Services Building. Each building was identified as having asbestos containing materials. Garbage collection services is provided to residents through the City's Department of Public Works. Typical Demolition debris can be disposed of at the Birchwood II C&D Landfill. Impacted soil will either be removed and disposed of property, or sealed under the foundation of the new buildings. All Asbestos materials identified will be properly disposed of to the Bradley County Landfill and within EPA guidelines and through the Hamilton County Air Pollution Control Bureau requirments. Lead and Asbestos and Radon Reports are attached below for the James Henry building, YFD, Sheila Jennings. For College Hill Courts these reports are found in the Phase I Report. Soil samples were conducted across the Westside in a Phase II analysis. Each site was tested for Volatile Organic Compounds, TPH Oil and Grease, TCLP Metals, and RCRA Metals. For a more in depth assessment of the findings in all Phase I and Phase II's please refer to the supporting documentation below or to the EA Body in Section 5.5.  |

**Supporting documentation**

[College Hill Courts\_James Henry\_YFD\_Gateway Towers - Phase 2.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011999632)

[College Hills\_James Henry\_YFD\_Gateway Toers - Soil Screening.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011999623)

[Youth and Family Center - Phase 1.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011999621)

[Youth and Family Center - Lead Assessment.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011999620)

[Youth and Family Center - Asbestos.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011999618)

[James A Henry - Asbestos.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011999613)

[James A Henry - Phase 1.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011999609)

[James A Henry - Lead Assessment.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011999608)

[Gateway Towers - Lead Assessment.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011999607)

[Gateway Towers - Asbestos.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011999604)

[College Hill Courts - Soil Screening.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011999603)

[College Hill Courts - Phase 1.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011999595)

[Shelia Jennings Rec Center - Phase 2.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011999593)

[Shelia Jennings Rec Center - Phase 1.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011999592)

[Youth and Family Center - Radon.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011999590)

[Gateway Towers - Radon.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011999589)

[Gateway Towers - Phase 1.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011999588)

[EA Body\_January 12 2024(1).pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011999014)

[Contamination-and-Toxic-Substances-Single-Partner-Worksheet.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011805125)

[Contamination-and-Toxic-Substances-Multifamily-Partner-Worksheet.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011805124)

**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 *et seq*.); particularly section 7 (16 USC 1536). | 50 CFR Part 402 |

**1. Does the project involve any activities that have the potential to affect specifies 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. Please refer to Section 6.2 of the EA pertaining to Endangered and Threatened Species The Preferred Alternative lacks suitable habitat for almost all of the federally and state protected species. The only potential habitat that is present within the study area includes temporarily abandoned buildings which may potentially provide suitable habitat for the Indiana bat, the northern long-eared bat, and the tricolored bat. The Preferred Alternative will include temporarily moving residents to another location as part of the construction process while leaving the buildings unoccupied for an unknown length of time. The Preferred Alternative lacks suitable habitat for almost all of the federally and state protected species. During online review though, it was found that this urban fully developed City site was identified in the USFWS IPAC with potential of occurrence for the northern long-eared bat, Indiana bat, and the tricolored bat. Our opinion is possibility of any of the three species to be found within the project area are unlikely. The site lies well within the dense urban setting of the City of Chattanooga and high levels of road and urban housing noise as well as urban housing and roadside artificial lighting have been documented to have a negative effect and deter Myotis species from successfully occupying or thriving in areas with these constant stressors for sustained periods. Please refer to all documentation below. The Preferred Alternative lacks suitable habitat for almost all of the protected migratory bird species. Due to the urbanization of the study area, anthropogenic structures are located throughout that could potentially provide suitable habitat for the chimney swift. To ensure that this migratory bird species will not be impacted by the proposed redevelopment of the project, demolition of structures providing suitable habitat for the chimney swift will not occur during its breeding season. The urbanized setting of the study area lacks suitable habitat for the remaining protected species. The local USFWS Field Office has been contacted for correspondence. No comments have been received. |

**Supporting documentation**

[Biological Assessment 2023-10-02.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011889374)

[11-Species List\_ Tennessee Ecological Services Field Office (1).pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011889373)

[10-NLAA Consistency Letter\_ Indiana Bat Determination Key 2023-04-20.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011805188)

[9-NE Consistency Letter\_ Northern Long-eared Bat Rangewide Determination Key 2023-04-20.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011805187)

[8-Climate\_Change\_Impacts\_to\_TN\_Wildlife.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011805186)

[7-Tennessee\_Natural\_Heritage\_Program\_RareSpeciesList.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011805184)

[5-TN-IPC Invasive Species List.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011805182)

[Endangered-Species-Act-Partner-Worksheet.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011805179)

[4-TN\_Rare\_Species\_By\_Watershed.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011805178)

[3-IPaC\_ Species\_List.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011805177)

[2-USGS\_WebSoilSurvey\_Map.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011805173)

[1-NWI\_Mapper.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011805172)

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

|  |  |
| --- | --- |
| ✓ | Yes |
|  | No |

**Explosive and Flammable Hazards**

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

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

|  |  |
| --- | --- |
| ✓ | No |
|  | Yes |

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

|  |  |
| --- | --- |
|  | No |

|  |  |
| --- | --- |
| ✓ | Yes |

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

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

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

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

|  |  |
| --- | --- |
|  | No |

|  |  |
| --- | --- |
| ✓ | Yes |

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

|  |  |
| --- | --- |
|  | Yes |

|  |  |
| --- | --- |
| ✓ | No |

**6. For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Mitigation measures may include both natural and manmade barriers, modification of the project design, burial or removal of the hazard, or other engineered solutions. Describe selected mitigation measures, including the timeline for implementation, and attach an implementation plan.**

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, upload approval from a licensed professional engineer in the Screen Summary at the conclusion of this screen.

|  |
| --- |
| An above ground fuel storage tank was found within the Westside Evolves project area at Gateway Towers. CHA will work with the local Fire Department at the time of removal of the fuel tank to ensure proper removal and disposal of all materials and liquids. All tanks outside of the Westside Evolves project area are within compliance and no mitigation is needed for those. |

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

**Screen Summary**

**Compliance Determination**

|  |
| --- |
| There is a current or planned stationary aboveground storage container of concern within 1 mile of the project site. The Separation Distance from the project was not initially acceptable. With mitigation, identified in the mitigation section of this review, the project will be in compliance with explosive and flammable hazard requirements. All potential explosive and flammable hazard requirements were evaluated in the Phase I Environmental Site Assessments that were conducted throughout the project area. |

**Supporting documentation**

[5-6000 P1 ESA Sheila Jennings Rec Center(1).pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011892728)

[3-Youth and Family Services Property Phase I ESA(1).pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011844747)

[2- Gateway Tower Property Phase I ESA(1).pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011844744)

[1-Former James A Henry School Property Phase I ESAFINALpdf (1).pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011844742)

[Explosives-Partner-Worksheet.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011805194)

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

|  |  |
| --- | --- |
| ✓ | Yes |
|  | No |

**Farmlands Protection**

|  |  |  |
| --- | --- | --- |
| General requirements | Legislation | Regulation |
| The Farmland Protection Policy Act (FPPA) discourages federal activities that would convert farmland to nonagricultural purposes. | Farmland Protection Policy Act of 1981 (7 U.S.C. 4201 et seq.) | [7 CFR Part 658](http://www.access.gpo.gov/nara/cfr/waisidx_11/7cfr658_11.html) |

**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 project is located in downtown Chattanooga and is classified and urban on the USGS classification map. |

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. According to the NRCS, the Farmland Protection Policy Act (FPPA) is intended to minimize the impact federal programs have on the unnecessary and irreversible conversion of farmland to nonagricultural uses. No farmlands are located within the study area. Under the No Action Alternative, the Westside Project would not be implemented, and conversion of farmland would not be an issue. Since no farmlands are located within the study area, conversion of farmland to nonagricultural use is not proposed by the Preferred Alternative. Therefore, no impacts to farmlands are anticipated as a result of the Preferred Alternative. Please refer to Section 3.5 of the EA |

**Supporting documentation**

[USGS Farmland Classification Map.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011805198)

[Farmlands-Partner-Worksheet.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011805197)

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

|  |  |
| --- | --- |
|  | Yes |
| ✓ | No |

**Floodplain Management**

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

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

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

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

[Preliminary FEMA Map.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000012004758)

[Floodplain-Management-Partner-Worksheet(1).pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011999402)

[Full\_FIRM\_225bc823-6ad0-41a9-835f-ec33299fd92b(2).pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011844752)

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. Prior to the construction of the Chickamauga Dam, Chattanooga was Tennessee Valley's most flood-prone city. Serious flooding damage was suffered during 1867, 1875, 1886, and 1917. The construction of the Chickamauga Dam reservoir system in 1936 along with other reservoirs on the Tennessee River and its tributaries have provided flood control to the city since and prevented nearly $5 billion in flood damage in the City of Chattanooga alone (Tennessee Valley Authority, 2023). Although the study area is located approximately 0.25 miles west of the Tennessee River, it is not located within a floodway or special flood hazard area of the river. The entirety of the study area is located within Zone X, an area of minimal flood hazard. The Westside Project is not located within a floodway or special flood zone of the Tennessee River. The entirety of the study area is located within Zone X, an area of minimal flood hazard. Therefore, flood plain management and flood insurance would not be a concern under the No Action Alternative or the Preferred Alternative. Please refer to Section 3.6 of the EA. |

**Supporting documentation**

[Floodplain-Management-Partner-Worksheet(1).pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011844754)

[Full\_FIRM\_225bc823-6ad0-41a9-835f-ec33299fd92b(2).pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011805203)

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

|  |  |
| --- | --- |
|  | Yes |
| ✓ | No |

**Historic Preservation**

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

***Threshold***

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

|  |  |
| --- | --- |
|  | No, because the project consists solely of activities listed as exempt in a Programmatic Agreement (PA ). (See the PA Database to find applicable PAs.) |
|  | No, because the project consists solely of activities included in a No Potential to Cause Effects memo or other determination [36 CFR 800.3(a)(1)]. |
| ✓ | Yes, because the project includes activities with potential to cause effects (direct or indirect). |

***Step 1 – Initiate Consultation***

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

|  |  |
| --- | --- |
|  |  |
| ✓ State Historic Preservation Offer (SHPO) | Completed |

|  |  |
| --- | --- |
|  |  |
| ✓ Advisory Council on Historic Preservation | Completed |

|  |  |
| --- | --- |
| ✓ | Indian Tribes, including Tribal Historic Preservation Officers (THPOs) or Native Hawaiian Organizations (NHOs) |

|  |  |
| --- | --- |
|  |  |
| ✓ Alabama-Coushatta Tribe of Texas | Completed |
| ✓ Cherokee Nation | Completed |
| ✓ Coushatta Tribe of Louisiana | Completed |
| ✓ Eastern Band of Cherokee Indians | Completed |
| ✓ Eastern Shawnee Tribe of Oklahoma | Completed |
| ✓ Muscogee (Creek) Nation | Completed |

|  |  |
| --- | --- |
| ✓ | Other Consulting Parties |

|  |  |
| --- | --- |
|  |  |
| ✓ Chattanooga African American Heritage Museum | Completed |
| ✓ Chattanooga Historical Society | Completed |

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

|  |
| --- |
| See all attachements |

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

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

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
|

|  |  |
| --- | --- |
|  | Yes |
|  | No |

 |  |

***Step 2 – Identify and Evaluate Historic Properties***

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

|  |
| --- |
| Westside Community in Chattanooga, TN |

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

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

|  |  |  |  |
| --- | --- | --- | --- |
| **Address / Location / District** | **National Register Status** | **SHPO Concurrence** | **Sensitive Information** |

**Additional Notes:**

|  |
| --- |
|  |

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

|  |  |
| --- | --- |
| ✓ | Yes |

Document and uploadsurveys and report(s) below.

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

Additional Notes:

|  |
| --- |
|  |

|  |  |
| --- | --- |
|  | No |

***Step 3 –Assess Effects of the Project on Historic Properties***

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

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

|  |  |
| --- | --- |
|  | No Historic Properties Affected |

|  |  |
| --- | --- |
|  | No Adverse Effect |

|  |  |
| --- | --- |
| ✓ | Adverse Effect |

**Document reason for finding; upload the criteria with summary and justification. Criteria of Adverse Effect 36 CFR 800.5.**

|  |
| --- |
| WHEREAS, the Chattanooga Housing Authority (CHA) plans to revitalize the Westside Neighborhood in Chattanooga, Tennessee, which includes the demolition of College Hill Courts, a public housing development, and the former Second District Junior High School building, and renovations to the former James A. Henry School; and WHEREAS, the CHA, as the recipient of the federal funds and/or approvals allocated for this project, assumes the responsibilities of the federal agency, in accordance with the U. S. Department of Housing and Urban Development's (HUD) Environmental Review Procedures, 24 CFR Part 58, published in the federal register on April 30, 1996 and as may be amended from time to time; and WHEREAS, CHA has determined that the undertaking consists of a phased redevelopment of the College Hill Courts, former Second District Junior High School, and James A. Henry School properties, which will utilize HUD Low Income Housing Tax Credits, HUD HOME Investment Partnership funds, and HUD Choice Neighborhood Initiative funds, and additional funding sources, thereby making the Project an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA), 16 U.S.C. s. 470f, and its implementing regulations, 36 C.F.R. part 800; and WHEREAS, the CHA has defined the undertaking's area of potential effect (APE) as described and shown in Attachment A; and WHEREAS, the CHA has determined that the undertaking may have an adverse effect on College Hill Courts, the former Second District Junior High School building, and the former James A. Henry School building, which are eligible for listing in the National Register of Historic Places, and has consulted with the Tennessee State Historic Preservation Officer (SHPO) pursuant to 36 C.F.R. part 800; and WHEREAS, the CHA has consulted with the City of Chattanooga regarding the effects of the undertaking on historic properties and has invited them to sign this MOA as an invited signatory' and WHEREAS, in accordance with 36 C.F.R. s. 800.6(a)(1), the CHA has notified the Advisory Council on Historic Preservation (ACHP) of its adverse effect determination providing the specified documentation, and the ACHP has chosen not to participate in the consultation pursuant to 36 C.F.R. s. 800.6(a)(1)(iii); NOW, THEREFORE, the CHA and the SHPO agree that the undertaking shall be implemented in accordance with the following stipulations in order to take into account the effect of the undertaking on historic properties. |

***Step 4 – Resolve Adverse Effects***

Work with consulting parties to try to avoid, minimize or mitigate adverse effects. Refer to HUD Exchange guidance and 36 CFR 800.6 and 800.7.

**Were the Adverse Effects resolved?**

|  |  |
| --- | --- |
| ✓ | Yes |

**Describe the resolution of Adverse Effects, including consultation efforts and participation by the Advisory Council on Historic Preservation**:

|  |
| --- |
| Many stipulations were addressed in the MOA |

**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.**

|  |
| --- |
| All stipulations will be met within the next year. |

Based on the response, the review is in compliance with this section. Document and upload the signed Memorandum of Agreement (MOA) or Standard Mitigation Measures Agreement (SMMA) below.

|  |  |
| --- | --- |
|  | No |

**Screen Summary**

**Compliance Determination**

|  |
| --- |
| Based on Section 106 consultation the project will have an Adverse Effect on historic properties. With mitigation, as identified in the MOA or SMMA, the project will be in compliance with Section 106. Satisfactory implementation of the mitigation should be monitored. According to the NRHP map, the entirety of the study area is located within the Chickamauga and Chattanooga National Military Park. Additionally, numerous National Register properties are located within one mile of the study area including the Second Presbyterian Church, St. Paul's Episcopal Church, Trigg - Smartt Building, the Read House, Market Street Warehouse Historic District, and the Tivoli Theatre. No historic buildings are located within the boundary of the study area. The THC Viewer was also consulted to determine if any state historic sites were located within or near the study area. According to the THC Viewer, 455 state historic sites are located within one mile of the site. No historic sites are located within the study area. All 455 historic sites are located east of the study area and US HWY 27. The city of Chattanooga initiated coordination with the local tribes that may have a stake in the Preferred Alternative site. A total of six letters were sent on April 25, 2023 to the tribal organizations for Section 106. A 30-day response period was also initiated, and no responses were received during that time. The coordination letters are located in Appendix K. The Preferred Alternative involves the redevelopment of the Westside, the entirety of which is located within the NRHP Chickamauga and Chattanooga National Military Park. In order to accommodate redevelopment within this historic area, a Memorandum of Agreement (MOA) between the CHA and the Tennessee State Historic Preservation Office (SHPO) was signed in February 2023 and is included in Appendix K of the EA. Please refer to Section 5.2 in the EA.  |

**Supporting documentation**

[Tribal Consultation Letters Sent.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011805331)

[Section 106 MOU ACHP Map.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011805330)

[Memorandum of Agreement - CHA-City signed - 2272023\_SHPO signature.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011805328)

[College Hill Courts - NRHP Evaluation Letter - Submittal.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011805327)

[Historic-Preservation-Partner-Worksheet.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011805312)

**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 1972General 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.  |

|  |  |
| --- | --- |
| ✓ | Noise generators were found within the threshold distances.  |

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

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

|  |  |
| --- | --- |
| ✓ | 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:  | 75 |

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

**Is your project in a largely undeveloped area?**

|  |  |
| --- | --- |
| ✓ | No |

|  |  |
| --- | --- |
| Indicate noise level here:  | 75 |

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

|  |  |
| --- | --- |
|  | Yes |

|  |  |
| --- | --- |
|  | Unacceptable: (Above 75 decibels) |

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

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

|  |  |
| --- | --- |
| Indicate noise level here:  | 75 |

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

6**. 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:  |

|  |
| --- |
| Please refer to the HUD Noise study for more information on noise impacts throughout the Westside. Mitigation for noise will include strategies to achieve ''acceptable noise levels'' will include: \* Interior Noise Penetration: In instances where there is higher than average outside noise disturbances, we will incorporate various strategies to mitigate interior noise penetration, using upgraded STC windows , using Mass loaded vinyl between the studs and the drywall, adding sound clips between the studs and the drywall, adding continuous rigid insulation to the exterior, or reducing window penetrations on the offending facades. We usually take a layered approach in order to find the best solution for each building facade that requires sound mitigation. \* The Lawn (south): The ground floor in this area is commercial and will be the center of commerce for the community as well as a major transit hub. The need for strong security and visibility at this location is essential for securing a safe environment, therefore, some traditional outdoor sound mitigation strategies will not be congruent with the security goal. The current noise mitigation strategies incorporated into the plan include providing layered landscaping along that frontage with street trees, shrubbery and ornamental trees. Additionally, noise is mitigated by the proposed bus shelter facility on Main Street and the attached transit shade structure. Th \* Outdoor Seating (south / middle): These areas are intended for outdoor sidewalk cafe dining adjacent to the public sidewalk abutting Main Street. It is intended to have a high level of activity and is surrounded by ground floor retail. Noise mitigation may be provided through street trees and additional landscaping along the back of sidewalk.  |

Based on the response, the review is in compliance with this section. Document and upload drawings, specifications, and other materials as needed to describe the project’s noise mitigation measures below.

|  |  |
| --- | --- |
|  | No mitigation is necessary.  |

**Screen Summary**

**Compliance Determination**

|  |
| --- |
| A Noise Study was conducted. The noise level was found to be normally acceptable to normally unacceptable throughout the entire project in all phases. Mitigation is needed in areas closest to busy highways. Noise mitigation measures can be found in the EA Body below in section 5.1 Please see the Noise Study and the EA Body in the attachments below. |

**Supporting documentation**

[Phasing Descriptions 1\_12\_2024.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011999332)

[EA Body\_January 12 2024(1).pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011999331)

[8-Appendix A Phasing Exhibits 12132023(1).pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011998480)

[BA Westside HUD Noise Study 11124 FINAL DRAFT.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011998476)

[Noise Mitigation Measures.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011844417)

[Noise-Abatement-and-Control-EA-Worksheet (1).pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011805401)

[Design Development Review Drawings 02-15-23- L sheets.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011805399)

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

|  |  |
| --- | --- |
| ✓ | Yes |
|  | No |

**Sole Source Aquifers**

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

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

|  |  |
| --- | --- |
|  | Yes |

|  |  |
| --- | --- |
| ✓ | No |

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

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

|  |  |
| --- | --- |
| ✓ | No |

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

|  |  |
| --- | --- |
|  | Yes |

**Screen Summary**

**Compliance Determination**

|  |
| --- |
| The project is not located on a sole source aquifer area. The project is in compliance with Sole Source Aquifer requirements. The study area is entirely urbanized and consists of residential, commercial, and industrial developments. Landscaped grass and trees are present throughout the study area which provide groundwater recharge and help control storm water runoff. Fragmented strips of woodland consisting of trees and shrubs are located throughout. The site is not currently subject to rapid water withdrawal problems that could negatively affect the water table or aquifers and currently utilizes public water and sewer. The Westside Project involves the redevelopment of an existing mixed-use community. A major part of the proposed plan involves updating and replacing existing housing while expanding the buildable footprint of the community by incorporating smaller, underutilized CHA properties and converting surface parking lots to mixed-use and residential developments. Due to the utilization of existing properties and parking lots, impervious surface areas will remain relatively similar, if not reduced slightly. Permeable surfaces included within the existing and proposed conditions of the study area include fragmented woodland, grassy parks, and community gardens that will aid in controlling stormwater runoff. Since the impervious surface area will remain relatively the same if not reduced slightly, and pervious surface areas will be improved by providing additional landscaping and community gardens, a minor beneficial impact is anticipated as a result of implementing the Preferred Alternative. Please refer to Section 6.1 of the EA. |

**Supporting documentation**

[SSA Map.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011805410)

[Sole-Source-Aquifers-Partner-Worksheet.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011805409)

**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 |

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

|  |  |
| --- | --- |
|  | Yes |

**Screen Summary**

**Compliance Determination**

|  |
| --- |
| Based on the project description this project includes no activities that would require further evaluation under this section. The project is in compliance with Executive Order 11990. The study area is entirely urbanized with only landscaped portions of grass and trees and fragmented strips of woodland. No streams, lakes, wetlands, or marshes are located within the study area. The USFWS's National Wetlands Inventory (NWI) Map, the NRCS's WSS, and aerial imagery were reviewed for the presence of water resources within the study area. The USFWS NWI Map did not identify streams or wetlands within the study area. Additionally, review of aerial imagery did not identify inundations or stream like features to be present. No wild and scenic rivers are present, and the NRCS's WSS did not identify hydric soils as present within the study area. A site visit was performed on April 20, 2023, to determine if unique natural features, sensitive natural areas, or water resources were present within the site. No unique natural features, sensitive natural areas, or water resources such as wetlands, streams, or lakes were observed within the study area. Therefore, impacts to these resources are not applicable to the study area. Although no water resources are present within the study area, standard BMPs will be followed during construction to ensure all sediment and materials remain onsite during construction, minimizing potential impacts to the Tennessee River 0.25 miles to the west.  |

**Supporting documentation**

[7-PhotoSummary docx(1).pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011844402)

[Wetlands-Partner-Worksheet.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011805412)

[1-NWI\_Mapper(1).pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011805411)

**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. The USFWS's National Wetlands Inventory (NWI) Map, the NRCS's WSS, and aerial imagery were reviewed for the presence of water resources within the study area. The USFWS NWI Map did not identify streams or wetlands within the study area. Additionally, review of aerial imagery did not identify inundations or stream like features to be present. No wild and scenic rivers are present, and the NRCS's WSS did not identify hydric soils as present within the study area. A site visit was performed on April 20, 2023, to determine if unique natural features, sensitive natural areas, or water resources were present within the site. No unique natural features, sensitive natural areas, or water resources such as wetlands, streams, or lakes were observed within the study area. Therefore, impacts to these resources are not applicable to the study area. Although no water resources are present within the study area, standard BMPs will be followed during construction to ensure all sediment and materials remain onsite during construction, minimizing potential impacts to the Tennessee River 0.25 miles to the west.  |

**Supporting documentation**

[NWSRS Study Rivers.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011998564)

[NWSRS Results.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011998563)

[NWSRS Designated Rivers Map TN-GA.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011998562)

[National Rivers Inventory Map (1).pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011998561)

[Wild-and-Scenic-Rivers-Partner-Worksheet (1).pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011805414)

**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. Please Refer to Chapter 4 of the EA on Socioeconomics. That Chapter is located below as well. The Westside Plan provides insight into the current employment and income patterns within the community. Compared to the City of Chattanooga, residents of the Westside have a higher percentage of residents with an annual income less than $15,000, four times lower median income that the media income for Chattanooga, and almost a 50 percent lower employment to population ratio compared to Chattanooga. The unemployment rate for Westside residents is noticeably higher than the City of Chattanooga and Hamilton County. Implementing the Proposed Alternative creates an opportunity for Westside residents to be employed in the redevelopment process. It is anticipated there will be numerous job opportunities in construction and supporting services for residents living in the housing that will be redeveloped and those living in the privately owned housing in Westside. With the buildout for this project lasting several years, the new job opportunities have the potential to be long-term. Additionally, there will be opportunities for some post construction jobs in the areas of grounds and building maintenance and jobs related to social services that will be provided for the Westside community. The Plan also discusses a partnership with the new construction trades school opening in East Chattanooga. Additionally, if new businesses can be recruited to the area, this will open jobs for Westside residents. This will be augmented with local, in-neighborhood hiring agreements and creating training opportunities, potentially in partnership with the Chamber of Commerce and/or Chattanooga State Community College. In summary, as the Westside Plan is implemented, residents of the community will be afforded new higher paying career opportunities and will have access to the training needed to fill these new positions. Implementing the Proposed Action will result in significant upgrades to the Westside. As described in the Plan, the existing 629 units in Gateway Tower and College Hill Courts will be demolished and replaced with 1783 new units. In place of the existing 629 units will be a new mixed-income community. Additionally, there is a possibility the number of new residences may increase to over 3,000 by adding additional sites. Current residents are guaranteed a new place to live if they choose to stay in the Westside. The build-first strategy will use existing vacant land to construct new residences before demolishing any existing residences. This will allow individuals and families to remain in the Westside and not be temporarily displaced. Depending on the new residents moving into the Westside, the Proposed Action may diversify the community's demographics. However, this is a goal of the Plan, thus it is not considered an adverse effect. Implementing the Proposed Alternative would address the 1994 Presidential Executive Order (EO) 12898, Federal Actions To Address Environmental Justice in Minority Populations and Low-Income Populations, which directs federal agencies to make ''achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations in the United States and its territories and possessions, the District of Columbia, the Commonwealth of Puerto Rico, and the Commonwealth of the Mariana Islands'' (EO 12898, 1994). The Westside Plan will also result in reducing environmental hazards, improving health-related issues, and providing much needed investment that will improve the infrastructure of the Westside.  |

**Supporting documentation**

[EA Body\_ Chapter 4 Socioecomics.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011892806)

[Environmental-Justice-Partner-Worksheet.pdf](https://heros.hud.gov/heros/faces/downloadFile.xhtml?erUploadId=900000011805419)

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

|  |  |
| --- | --- |
| ✓ | Yes |
|  | No |