

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

Project Information

Project Name: 1805-Church---Mt.-Pisgah-Apts-

HEROS Number: 900000010346710

Start Date: 08/17/2023

Responsible Entity (RE): EVANSTON, 909 Davis Street Evanston IL, 60201

RE Preparer: Ana Elizarraga

State / Local Identifier:

Certifying Officer: Sarah Flax

Grant Recipient (if different than Responsible Entity):

Point of Contact:

Consultant (if applicable):

Point of Contact:

40 CFR 1506.5(b)(4): The lead agency or, where appropriate, a cooperating agency shall prepare a disclosure statement for the contractor's execution specifying that the contractor has no financial or other interest in the outcome of the action. Such statement need not include privileged or confidential trade secrets or other confidential business information.

By checking this box, I attest that as a preparer, I have no financial or other interest in the outcome of the undertaking assessed in this environmental review.

Project Location: 1805 Church St, Evanston, IL 60201

Additional Location Information:

N/A

Direct Comments to:

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

The site is a rectangular-shaped property that is almost entirely vacant except for a two-story building that has been used as a church for 40 years. The existing six lots will be combined and subdivided into two lots, one for this project and one for the church. One of the six lots was previously a gas station which was mitigated in 2019 and has a No Further Remediation Letter from the IEPA #0310815369. The only building on the site is Mt Pisgah Ministry's church at 1815 Church Street. The building is a two story masonry structure used as a storefront church that will be demolished. The only building on the site is Mt. Pisgah Ministry's church at 1815 Church Street. The building is a two story masonry structure used as a storefront church that will be demolished. This project is part of a larger redevelopment of half the block which is partially owned by the City of Evanston. The Housing Opportunity Development Corporation (HODC) is partnering with Mt. Pisgah Ministry who owns the other half of the site and will build a new church next door. The team was selected by the City through an RFP to develop the site. Each project, housing and church, will be owned and financed separately. HODC will own and manage the residential/retail building. The existing two story storefront church would be demolished and a new mixed use building with 33 affordable apartments and 2,250 sq. Ft. of retail. The new building will be 4 stories with 31 parking spaces under the building. Exterior construction will be brick and cement. The development will target all low income residents with units set-aside for persons with disabilities. Amenities will include a laundry room, community room, and property management office. Unit amenities will include large open floor plans, Energy Star appliances, handicap accessibility/adaptability, and energy efficient HVAC systems. The building will be secured with security cameras in the common areas and entry. Each unit will have high-speed internet access, a microwave oven and an Energy Star-rated ceiling fan with switched light fixture in every living room and bedroom. Energy efficient construction will be used to receive green certification.

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

This project addresses the following housing needs in Evanston identified through the City's affordable housing planning process, as well as in the Consolidated Plan and Age Friendly Evanston Action Plan: The development will target all low income households

of one to six person families with units set-aside for persons with disabilities with a residency preference for Evanston residents and workers.

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

The site is a rectangular-shaped property that is almost entirely vacant except for a two-story building that has been used as a church for 40 years. The existing six lots will be combined and subdivided into two lots, one for this project and one for the church. One of the six lots was previously a gas station which was mitigated in 2019 and has a No Further Remediation Letter from the IEPA #0310815369. The first floor facing Church St will contain about 2250 SF of neighborhood retail space. There will be a storefront to be occupied by a business that serves the local community such as grocery, clothing store, bank, deli, job training, or other use. The team is working with the community to identify local minority or female owned businesses to occupy the space. Private space will be made available for agencies to provide on-site supportive services to residents. HODC plans to collaborate with local nonprofits to provide supportive services for resident populations.

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

Determination:

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

Approval Documents:

7015.15 certified by Certifying Officer
on:

7015.16 certified by Authorizing Officer
on:

Funding Information

Grant / Project Identification Number	HUD Program	Program Name	Funding Amount
M23MC170218	Community Planning and Development (CPD)	HOME Program	\$629,000.00

**Estimated Total HUD Funded,
Assisted or Insured Amount:** \$629,000.00

**Estimated Total Project Cost [24 CFR 58.2 (a)
(5)]:** \$22,115,599.00

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

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6	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	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements. The subject property is located approximately 11 miles northeast of Chicago O'Hare International Airport, 11.5 miles southeast of Chicago Executive Airport, and 18 miles northeast of Chicago Midway International Airport.
Coastal Barrier Resources Act Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is located in a state that does not contain CBRS units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Based on the project description the project includes no activities that would require further evaluation under this section. The project does not require flood insurance or is excepted from flood insurance. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with Flood Insurance requirements.

STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5		
<p>Air Quality Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The project's county or air quality management district is in non-attainment status for the following: Ozone. This project does not exceed de minimis emissions levels or the screening level established by the state or air quality management district for the pollutant(s) identified above. The project is in compliance with the Clean Air Act. The redevelopment project will have no impact on air quality. The project is in a residential/commercial area of the City of Evanston and will comply with all city and state regulation concerning dust suppression. The site is located within an attainment area.</p>
<p>Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project is not located in or does not affect a Coastal Zone as defined in the state Coastal Management Plan. The project is in compliance with the Coastal Zone Management Act.</p>
<p>Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Site contamination was evaluated as follows: ASTM Phase I ESA, ASTM Phase II ESA. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. ECG also reviewed the Illinois Emergency Management Agency's (IEMA) Radon Map (2011). According to the study and publication, Cook County, the county in which the property lies, has a predicted average screening level of greater than 2 pCi/L, but less than 4 pCi/L.</p>
<p>Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>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.</p>
<p>Explosive and Flammable Hazards Above-Ground Tanks)[24 CFR Part 51 Subpart C</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>There are no current or planned stationary aboveground storage containers of concern within 1 mile of</p>

		<p>the project site. The project is in compliance with explosive and flammable hazard requirements. The subject property is not located on or near an area where hazardous gases (e.g. liquid propane), chemicals of a flammable nature (e.g. benzene, hexane), or any other potentially hazardous materials are stored in a structure. According to the Phase I ESA, the site is not located adjacent to any SEMS sites. On 2/19/26, ECG accessed the Illinois EPA Leaking Underground Storage Tank (LUST) database. The search indicated that the subject property is not listed on the LUST database. However, the east adjoining property is listed on the LUST database. As previously stated, a small portion of the subject property was part of the east adjoining property. As previously stated, five UST were removed from the east adjoining property in June of 2015. During the removal, a release of gasoline was noted, and LUST incident Number 20150678 was assigned to the release. In March of 2018, the Illinois EPA issued an NFR Letter for the east adjoining property. In ECG's opinion, since the east adjoining property received an NFR letter from the Illinois EPA, no further actions are required.</p>
<p>Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>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.</p>
<p>Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project does not occur in a floodplain. The project is in compliance with Executive Order 11988.</p>
<p>Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Based on the project description the project has No Potential to Cause Effects. The project is in compliance with Section 106. On 2/19/26, ECG reviewed the National Register of</p>

		<p>Historic Places website. According to the website, the subject property is not listed on the National Register of Historic Places. ECG completed a historical search utilizing the Historic Architectural Recourses Geographic Information System (HARGIS). The HARGIS map indicates that historical districts are located near the subject property. The HARGIS map indicates that the subject property does not lie within these designated areas.</p>
<p>Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The Preliminary Screening identified no noise generators in the vicinity of the project. The project is in compliance with HUD's Noise regulation.</p>
<p>Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The project is not located on a sole source aquifer area. The project is in compliance with Sole Source Aquifer requirements. According to the US EPA Region V, there is one Sole Source Aquifer (SSA) located in Illinois. The aquifer is known as "Mahomet Aquifer" and is approximately 80 miles south of the subject property. Therefore, the subject property is not located in an area supported by an SSA.</p>
<p>Wetlands Protection Executive Order 11990, particularly sections 2 and 5</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The project will not impact on- or off-site wetlands. The project is in compliance with Executive Order 11990. The Wetlands map indicates that there are no designated wetland areas located on or near the subject property.</p>
<p>Wild and Scenic Rivers Act Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act. According to the National Wild and Scenic Rivers System, there are no scenic rivers in Cook County. The only scenic river in Illinois is the Vermillion River, which is located over 120 miles from the site.</p>
<p>HUD HOUSING ENVIRONMENTAL STANDARDS</p>		

ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898. Environmental justice will not be an issue in the City of Evanston. The effects of the subject property will not cause disproportional adverse effects on minority and low-income neighborhoods as opposed to the community at large. The proposed project will provide much needed housing for low income individuals within the City of Evanston. The State's ability to offer community living hinges not only upon the availability of home and community-based services, but also the availability of accessible housing that is affordable. Because the project exposes no one to adverse environmental conditions, the project does not expose low income or minority populations to adverse environmental impacts.

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	2	The subject property is currently developed with a two-story building, the site is zoned as B2 "Business District. Project allowed/approved as a special use by plat of subdivision.	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2	The site is currently developed with a two-story church building. The proposed scope of work involves the redevelopment of the subject property with a 4-story mixed-use building with ground floor retail, 33 all affordable dwelling units, and on-site parking, and the approved new Mt. Pisgah 3-story church building. The site is relatively flat. According to the USDA's Web Soil Survey, the subject property is located on "Urban Land."	
Hazards and Nuisances including Site Safety and Site-Generated Noise	2	There are no hazards or nuisances that would impact the subject property. There are no natural hazards located on or adjacent to the subject property, such as steep slopes, geologic faults or hazardous terrain features. According to the US Geological Survey (USGS), the subject property is located in a hazard area of 0.4-0.8 (g) in the US Seismic Hazard 2% in 50 years PGA.	
SOCIOECONOMIC			
Employment and Income Patterns	2	No change to employment or income patterns. Employment/Income patterns will not be affected.	
Demographic Character Changes / Displacement	2	The area surrounding the subject property is residential, mixed-use, and commercial. The proposed development will not change the demographic character of the area. The project will not result in physical barriers or reduced access, which will isolate a particular neighborhood or population group. The project will not make access to local services, facilities, institutions, or other parts of the City of Evanston more difficult or inconvenient.	
Environmental Justice EA Factor	2	No impact on environmental justice EA Factor.	
COMMUNITY FACILITIES AND SERVICES			
Educational and Cultural Facilities (Access and Capacity)	2	Private institutions and the City of Evanston provides pre-school, elementary, Jr. High, and High School education. Nearby schools include Evanston Township High School,	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		Dewey Elementary School, and Roycemore School. The schools are located less than 1 mile from the site. Additionally, several colleges and universities are located within the City of Evanston and Chicago and the surrounding area.	
Commercial Facilities (Access and Proximity)	2	There are numerous commercial and retail establishments within 0.50 miles of the site.	
Health Care / Social Services (Access and Capacity)	2	There are several health care providers and hospitals near the subject property. Evanston Hospital is located approximately 1.0 miles northeast of the site. Additionally, Amita Health is located approximately 1.8 miles of the south of the site.	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	2	The City of Evanston offers residents refuse and recycling service through Advanced Disposal. The City of Evanston provides information on hazardous waste, lawn & garden waste programs such as brush pick-up, leaf pick-up, and a brush drop-off site.	
Waste Water and Sanitary Sewers (Feasibility and Capacity)	2	Sanitary services are provided by the City of Evanston through the Metropolitan Water Reclamation District of Greater Chicago (MWRDGC). The MWRDGC has numerous wastewater treatment facilities throughout the City of Chicago and suburbs. The project will not be adversely affected by proximity to facilities. The project will not create or contribute runoff water that would exceed the capacity of existing or planned storm drainage systems or provide substantial additional sources of polluted runoff. The storm water system is maintained by the City of Evanston.	
Water Supply (Feasibility and Capacity)	2	Water supply is provided by the City of Evanston. The City of Evanston obtains its water from Lake Michigan.	
Public Safety - Police, Fire and Emergency Medical	2	The site is served by the City of Evanston Police Department. The nearest city station is located 0.75 miles southeast of the subject property. There are no existing obstacles that would prohibit an emergency	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		situation. The design of the property does not create obstacles or isolated areas. Fire Services are handled by the Evanston Fire Department. The nearest Fire Station is located within 0.38 miles of the site. There are several health care providers and hospitals near the subject property. Evanston Hospital is located approximately 1.0 miles northeast of the site. Additionally, Amita Health is located approximately 1.8 miles of the south of the site.	
Parks, Open Space and Recreation (Access and Capacity)	2	The City of Evanston has numerous parks and recreational facilities. A map showing the parks in the area of the site is provided in Appendix BB. The Evanston Park District owns and manages six beaches on the city's eastern border along Lake Michigan.	
Transportation and Accessibility (Access and Capacity)	2	The subject property is located along Pace bus route line 213. Metra North Line railroad track is located approximately 1 mile east of the subject property.	
NATURAL FEATURES			
Unique Natural Features /Water Resources	2	There are no unique natural features on the subject property because the subject property is currently developed with a two-story church building. The subject property will not affect any unique natural features or resource extraction on or near the subject property. The subject property will not destroy or isolate nearby unique natural features from public or scientific access. As previously stated, Lake Michigan is located approximately 1.3 miles east of the subject property and the Chicago River is located 0.57 miles west of the subject property. According to the National Wild and Scenic Rivers System, there are no scenic rivers in Cook County. The only scenic river in Illinois is the Vermillion River, which is located over 120 miles from the site.	
Vegetation / Wildlife (Introduction, Modification,	2	The subject property is currently developed with a twostory residential building. There is no existing wildlife habitats on the subject	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Removal, Disruption, etc.)		property or adjacent to the subject property. The rehabilitation of the subject property will not threaten any animal species listed as endangered or threatened. There are no game fish habitats or spawning grounds on the subject property or adjacent to the subject property. The rehabilitation of the subject property will not create conditions favorable to the proliferation of pest species.	
Other Factors 1			
Other Factors 2			
CLIMATE AND ENERGY			
Climate Change	2	The two most imminent climate change factors affecting the City of Evanston are temperature increase (heat waves) and precipitation patter changes. The City of Evanston is committed to fighting and preparing for the impacts of climate change through climate policy such as the Evanston Municipal Operations Zero Emissions Strategy and the Climate Action and Resilience Plan (CARP).	
Energy Efficiency	2	City of Evanston Carbon Neutral Fleet Action Plan along with the Climate Action and Resilience Plan (CARP). Were put in place to achieve the City of Evanston's call for carbon neutrality by 2050, zero waste by 2050 and 100% renewable electricity by 2030 among other goals.	

Supporting documentation

- [Climate Action Accomplishm.pdf](#)
- [Evanston Carbon Neutral Fl.pdf](#)
- [3 Renewable Energy and Bui.pdf](#)
- [4 Green Infrastructure_Urb.pdf](#)
- [supporting docs_environmental assessment.pdf](#)

Additional Studies Performed:

Field Inspection [Optional]: Date and completed
by:

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

Illinois Department of Natural Resources; Federal Emergency Management Authority and National Flood Insurance Program; US Environmental Protection Agency; Illinois Department of Natural Resources; US Environmental Protection Agency; Illinois Environmental Protection Agency; Illinois State Geological Survey; US Fish and Wildlife Service; NEPAssist; American Farmland Trust; Historic Architectural Resource Geographic Information System; US Department of Housing and Urban Development; National Wild and Scenic River System; City of Evanston; US Department of Agriculture.

List of Permits Obtained:

No permits were obtained for this Phase I ESA.

Public Outreach [24 CFR 58.43]:

Cumulative Impact Analysis [24 CFR 58.32]:

The Phase I Environmental Site Assessment (ESA) conducted by Environmental Consulting Group, Inc. (ECG) for the property at 1805-1815 Church Street in Evanston, Illinois revealed no significant environmental issues or contamination, indicating no Recognized Environmental Conditions (RECs). A Controlled REC was identified, involving a past contamination issue that has been addressed and controlled through specific measures noted in the Phase I and Phase II reports. The property was enrolled in the Illinois EPA's Site Remediation Program (SRP), and a Focused No Further Remediation (NFR) Letter was issued. This letter outlines restrictions, including maintaining an asphalt barrier over contaminated soil, connecting to municipal water supply, implementing land use controls, and more. The historical use of the property included residential, commercial, and gasoline service station purposes, but based on ECG's assessment, no further investigation is deemed necessary. The construction of the 33 unit affordable housing development will have a cumulative positive impact on the area identified by the report. This will not have a cumulative impact on the areas identified in this report.

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

Not applicable.

No Action Alternative [24 CFR 58.40(e)]

Not applicable.

Summary of Findings and Conclusions:

Based on the results of ECG's site reconnaissance and research, in our opinion, this assessment has revealed no recognized environmental conditions (RECs) associated with the subject property. However, ECG identified the following Controlled REC associated with the subject property. As stated above, the eastern portion of the subject property was part of a larger gasoline service station which formerly occupied the eastern adjoining property. In November of 2015, the eastern adjoining property enrolled into the Illinois EPA's Site Remediation Program (SRP). A Focused No Further Remediation (NFR) Letter was issued to the eastern adjoining property on November 6, 2017. Additionally, ECG identified the following business environmental risk associated with the subject property. Based on the age of the building that occupies the subject property, asbestos-containing materials (ACMs) and/or lead-based paint (LBP) may be present in the subject building. As part of the Phase I ESA, ECG completed an ACM Inspection. The ACM inspection noted the following: Mt Pisgah Ministry and HODC propose to transform the 1800 block of Church Street by constructing two new buildings that will activate and revitalize the area. The project will create neighborhood retail space, affordable rental units, and a new church at 1805-1815 Church Street. Mt Pisgah and HODC will partner on all aspects of the development as one overall project but each building will be owned and financed separately. Mt Pisgah will contribute the land it currently owns and will include the City-owned land once it is given ownership by the City. HODC will develop a mixed-use retail and residential building with street level shops and apartments above. There will be approximately 2,000 square feet of leasable commercial space facing Church St. The apartment building will be a new 4 story masonry structure with an elevator. Parking will be located at-grade under the building. There will be 33 units including 12-1 bedroom, 10-2 bedroom, and 11-3 bedroom units as workforce housing for families. The building will include energy efficient measures to obtain National Green Building Standards certification and Energy Star rating. Rents will be affordable to households earning less than 60% of area median income. HODC will own and manage the apartments upon completion. The proposed work will make every effort to minimize the adverse environmental impacts. All contractors on site will follow all federal, state, and city regulations concerning environmental impacts.

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

Summarized below are all mitigation measures adopted by the Responsible Entity to reduce, avoid or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be

incorporated into project contracts, development agreements and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure or Condition	Comments on Completed Measures	Mitigation Plan	Complete
Contamination and Toxic Substances	ECG also reviewed the Illinois Emergency Management Agency's (IEMA) Radon Map (2011). According to the study and publication, Cook County, the county in which the property lies, has a predicted average screening level of greater than 2 pCi/L, but less than 4 pCi/L. A copy of the Radon Map for Illinois Counties is provided.	N/A		

Project Mitigation Plan

According to the study and publication, Cook County, the county in which the property lies, has a predicted average screening level of greater than 2 pCi/L, but less than 4 pCi/L. Mt Pisgah Ministry and HODC propose to transform the 1800 block of Church Street by constructing two new buildings that will activate and revitalize the area. The project will create neighborhood retail space, affordable rental units, and a new church at 1805-1815 Church Street. Mt Pisgah and HODC will partner on all aspects of the development as one overall project but each building will be owned and financed separately. Mt Pisgah will contribute the land it currently owns and will include the City-owned land once it is given ownership by the City. HODC will develop a mixed-use retail and residential building with street level shops and apartments above. There will be approximately 2,000 square feet of leasable commercial space facing Church St. The apartment building will be a new 4 story masonry structure with an elevator. Parking will be located at-grade under the building. There will be 33 units including 12-1 bedroom, 10-2 bedroom, and 11-3 bedroom units as workforce housing for families. The building will include energy efficient measures to obtain National Green Building Standards certification and Energy Star rating. Rents will be affordable to households earning less than 60% of area median income. HODC will own and manage the apartments upon completion. The proposed work will make every effort to minimize the adverse environmental impacts. All contractors on site will follow all federal, state, and city regulations concerning environmental impacts.

Supporting documentation on completed measures

APPENDIX A: Related Federal Laws and Authorities

Airport Hazards

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

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

No

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

Yes

Screen Summary

Compliance Determination

The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements. The subject property is located approximately 11 miles northeast of Chicago O'Hare International Airport, 11.5 miles southeast of Chicago Executive Airport, and 18 miles northeast of Chicago Midway International Airport.

Supporting documentation

[MDW Noise Contour Map.pdf](#)

[ORD-OMP-FullBuildOutNoiseContour.pdf](#)

[Chicago Exec Airport 2011 Noise exp map.pdf](#)

[ORD-Evanston-AirspaceProximity-Exhibit-082311.pdf](#)

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

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

Supporting documentation

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

Are formal compliance steps or mitigation required?

Yes

✓ No

Flood Insurance

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

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

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

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

Yes

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.

Supporting documentation

[FIRMETTE_7bdbb450-7e51-4b62-b59c-8606b3cce41c.pdf](#)
[West_north.pdf](#)

Are formal compliance steps or mitigation required?

1805-Church---Mt.-Pisgah-
Apts-

Evanston, IL

900000010346710

Yes

✓ No

Air Quality

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

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

Yes

No

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

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

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

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

Carbon Monoxide

Lead

Nitrogen dioxide

Sulfur dioxide

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

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

Ozone 0.08 ppb (parts per million)

Provide your source used to determine levels here:

Lead (2008) Designated Area Design Values and 8-Hour Ozone (2015) Designated Area Design Values, Data is current as of July 31, 2023

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

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

Enter the estimate emission levels:

Ozone 0.08 ppb (parts per million)

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

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

Screen Summary

Compliance Determination

The project's county or air quality management district is in non-attainment status for the following: Ozone. This project does not exceed *de minimis* emissions levels or the screening level established by the state or air quality management district for the pollutant(s) identified above. The project is in compliance with the Clean Air Act. The redevelopment project will have no impact on air quality. The project is in a residential/commercial area of the City of Evanston and will comply with all city and

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state regulation concerning dust suppression. The site is located within an attainment area.

Supporting documentation

[De Minimis Tables US EPA.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Coastal Zone Management Act

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

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

Yes

No

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

Screen Summary

Compliance Determination

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

Supporting documentation

[Coastal Barrier Resource map of USA\(1\).pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Contamination and Toxic Substances

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

1. How was site contamination evaluated?* Select all that apply.

ASTM Phase I ESA

ASTM Phase II ESA

Remediation or clean-up plan

ASTM Vapor Encroachment Screening.

None of the above

* HUD regulations at 24 CFR § 58.5(i)(2)(ii) require that the environmental review for multifamily housing with five or more dwelling units or non-residential property include the evaluation of previous uses of the site or other evidence of contamination on or near the site.

For acquisition and new construction of multifamily and nonresidential properties HUD strongly advises the review include an ASTM Phase I Environmental Site Assessment (ESA) to meet real estate transaction standards of due diligence and to help ensure compliance with HUD's toxic policy at 24 CFR §58.5(i) and 24 CFR §50.3(i). Also note that some HUD programs require an ASTM Phase I ESA.

2. Were any on-site or nearby toxic, hazardous, or radioactive substances* (excluding radon) 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?)

Provide a map or other documentation of absence or presence of contamination** and explain evaluation of site contamination in the Screen Summary at the bottom of this screen.

✓ No

Explain:

No nearby toxic, hazardous, or radioactive substances are present as a result of the Phase I. Phase II environmental review revealed that cumulative soil analytical results showed that all four of the soil samples had contaminant concentrations below the Illinois EPA's Tier 1 SROs. Additionally, the cumulative groundwater analytical results indicated that BTEX concentrations were detected below the Tier 1 GROs for the Indoor Inhalation Exposure Route. Environmental Consulting Group (ESG) believes further assessment of the PNAs are not necessary and further investigation of the subject property is not warranted.

Yes

* This question covers the presence of radioactive substances excluding radon. Radon is addressed in the Radon Exempt Question.

** Utilize EPA's Enviromapper, NEPAssist, or state/tribal databases to identify nearby dumps, junk yards, landfills, hazardous waste sites, and industrial sites, including EPA National Priorities List Sites (Superfund sites), CERCLA or state-equivalent sites, RCRA Corrective Action sites with release(s) or suspected release(s) requiring clean-up action and/or further investigation. Additional supporting documentation may include other inspections and reports.

3. Evaluate the building(s) for radon. Do all buildings meet any of the exemptions* from having to consider radon in the contamination analysis listed in CPD Notice [CPD-23-103](#)?

Yes

Explain:

✓ No

* Notes:

- Buildings with no enclosed areas having ground contact.
- Buildings containing crawlspaces, utility tunnels, or parking garages would not be exempt, however buildings built on piers would be exempt, provided that there is open air between the lowest floor of the building and the ground.
- Buildings that are not residential and will not be occupied for more than 4 hours per day.
- Buildings with existing radon mitigation systems - document radon levels are below 4 pCi/L with test results dated within two years of submitting the application for HUD assistance and document the system includes an ongoing maintenance plan that includes periodic testing

to ensure the system continues to meet the current EPA recommended levels. If the project does not require an application, document test results dated within two years of the date the environmental review is certified. Refer to program office guidance to ensure compliance with program requirements.

- Buildings tested within five years of the submission of application for HUD assistance: test results document indoor radon levels are below current the EPA's recommended action levels of 4.0 pCi/L. For buildings with test data older than five years, any new environmental review must include a consideration of radon using one of the methods in Section A below.

4. Is the proposed project new construction or substantial rehabilitation where testing will be conducted but cannot yet occur because building construction has not been completed?

✓ Yes

Compliance with this section is conditioned on post-construction testing being conducted, followed by mitigation, if needed. Radon test results, along with any needed mitigation plan, must be uploaded to the mitigation section within this screen.

No

8. Mitigation

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

For instances where radon mitigation is required (i.e. where test results demonstrated radon levels at 4.0 pCi/L and above), then you must include a radon mitigation plan*.

Can all adverse environmental impacts be mitigated?

No, all adverse environmental impacts cannot feasibly be mitigated.
Project cannot proceed at this location.

- ✓ Yes, all adverse environmental impacts can be eliminated through mitigation, and/or consideration of radon and radon mitigation, if needed, will occur following construction.
Provide all mitigation requirements** and documents in the Screen Summary at the bottom of this screen.

* Refer to CPD Notice [CPD-23-103](#) for additional information on radon mitigation plans.

** Mitigation requirements include all clean-up requirements required by applicable federal, state, tribal, or local law. Additionally, please upload, as applicable, the long-term operations and maintenance plan, Remedial Action Work Plan, and other equivalent documents.

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

ECG also reviewed the Illinois Emergency Management Agency's (IEMA) Radon Map (2011). According to the study and publication, Cook County, the county in which the property lies, has a predicted average screening level of greater than 2 pCi/L, but less than 4 pCi/L. A copy of the Radon Map for Illinois Counties is provided.

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

Complete removal

Risk-based corrective action (RBCA)

✓ Other

* Engineering controls are any physical mechanism used to contain or stabilize contamination or ensure the effectiveness of a remedial action. Engineering controls may include, caps, covers, dikes, trenches, leachate collection systems, radon mitigation systems, signs, fences, physical access controls, ground water monitoring systems and ground water containment systems including, slurry walls and ground water pumping systems.

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

Screen Summary

Compliance Determination

Site contamination was evaluated as follows: ASTM Phase I ESA, ASTM Phase II ESA.

On-site or nearby toxic, hazardous, or radioactive substances that could affect the

health and safety of project occupants or conflict with the intended use of the property were not found. ECG also reviewed the Illinois Emergency Management Agency's (IEMA) Radon Map (2011). According to the study and publication, Cook County, the county in which the property lies, has a predicted average screening level of greater than 2 pCi/L, but less than 4 pCi/L.

Supporting documentation

[Asbestos Inspection 1811-1813 Church Street.pdf](#)

[Phase I ESA \(110\).pdf](#)

[Phase II Report 1805 Church St.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Endangered Species

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

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

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

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

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

No, the project will have No Effect based on a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office

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

Screen Summary

Compliance Determination

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

Supporting documentation

[USFWS_Illinois Threatened and Endangered Species.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Explosive and Flammable Hazards

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

1. Is the proposed HUD-assisted project 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

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

Yes

Screen Summary

Compliance Determination

There are no current or planned stationary aboveground storage containers of concern within 1 mile of the project site. The project is in compliance with explosive and flammable hazard requirements. The subject property is not located on or near an area where hazardous gases (e.g. liquid propane), chemicals of a flammable nature (e.g. benzene, hexane), or any other potentially hazardous materials are stored in a structure. According to the Phase I ESA, the site is not located adjacent to any SEMS sites. On 2/19/26, ECG accessed the Illinois EPA Leaking Underground Storage Tank (LUST) database. The search indicated that the subject property is not listed on the LUST database. However, the east adjoining property is listed on the LUST database. As previously stated, a small portion of the subject property was part of the east adjoining property. As previously stated, five UST were removed from the east adjoining property in June of 2015. During the removal, a release of gasoline was noted, and LUST incident Number 20150678 was assigned to the release. In March of 2018, the Illinois EPA issued an NFR Letter for the east adjoining property. In ECG's opinion, since the east adjoining property received an NFR letter from the Illinois EPA, no further actions are required.

Supporting documentation

[Final NFR re-issued \(2\).pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Farmlands Protection

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

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 subject property is not farmland. The subject property has been developed since at least 1920 and is located within a residential and commercial area of Evanston.

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

Screen Summary

Compliance Determination

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

Supporting documentation

[Urban area.JPG](#)

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 * Executive Order 13690 * 42 USC 4001-4128 * 42 USC 5154a * only applies to screen 2047 and not 2046	24 CFR 55

1. Does this project meet an exemption at 24 CFR 55.12 from compliance with HUD's floodplain management regulations in Part 55?

Yes

(a) HUD-assisted activities described in 24 CFR 58.34 and 58.35(b).

(b) HUD-assisted activities described in 24 CFR 50.19, except as otherwise indicated in § 50.19.

(c) The approval of financial assistance for restoring and preserving the natural and beneficial functions and values of floodplains and wetlands, including through acquisition of such floodplain and wetland property, where a permanent covenant or comparable restriction is place on the property's continued use for flood control, wetland projection, open space, or park land, but only if:

(1) The property is cleared of all existing buildings and walled structures; and

(2) The property is cleared of related improvements except those which:

(i) Are directly related to flood control, wetland protection, open space, or park land (including playgrounds and recreation areas);

(ii) Do not modify existing wetland areas or involve fill, paving, or other ground disturbance beyond minimal trails or paths; and

(iii) Are designed to be compatible with the beneficial floodplain or wetland function of the property.

(d) An action involving a repossession, receivership, foreclosure, or similar acquisition of property to protect or enforce HUD's financial interests under previously approved loans, grants, mortgage insurance,

or other HUD assistance.

(e) Policy-level actions described at 24 CFR 50.16 that do not involve site-based decisions.

(f) A minor amendment to a previously approved action with no additional adverse impact on or from a floodplain or wetland.

(g) HUD's or the responsible entity's approval of a project site, an incidental portion of which is situated in the FFRMS floodplain (not including the floodway, LiMWA, or coastal high hazard area) but only if: (1) The proposed project site does not include any existing or proposed buildings or improvements that modify or occupy the FFRMS floodplain except de minimis improvements such as recreation areas and trails; and (2) the proposed project will not result in any new construction in or modifications of a wetland .

(h) Issuance or use of Housing Vouchers, or other forms of rental subsidy where HUD, the awarding community, or the public housing agency that administers the contract awards rental subsidies that are not project-based (i.e., do not involve site-specific subsidies).

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

Describe:

No

Screen Summary

Compliance Determination

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

Supporting documentation

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).

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

Review of the National Register of Historic Places website revealed the subject property is not listed on the National Register of Historic Places. A historical search was completed utilizing the Historic Architectural Recourses Geographic Information System (HARGIS). The HARGIS map indicates that historical districts are located near the subject property. The HARGIS map indicates that the subject property does not lie within these designated areas.

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

Screen Summary

Compliance Determination

Based on the project description the project has No Potential to Cause Effects. The project is in compliance with Section 106. On 2/19/26, ECG reviewed the National

Register of Historic Places website. According to the website, the subject property is not listed on the National Register of Historic Places. ECG completed a historical search utilizing the Historic Architectural Recourses Geographic Information System (HARGIS). The HARGIS map indicates that historical districts are located near the subject property. The HARGIS map indicates that the subject property does not lie within these designated areas.

Supporting documentation

[HARGIS Church St.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Noise Abatement and Control

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

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

- New construction for residential use

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

Rehabilitation of an existing residential property

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

An interstate land sales registration

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

None of the above

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

Indicate the findings of the Preliminary Screening below:

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

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

Noise generators were found within the threshold distances.

Screen Summary

Compliance Determination

The Preliminary Screening identified no noise generators in the vicinity of the project. The project is in compliance with HUD's Noise regulation.

Supporting documentation

[Airport noise maps.pdf](#)

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. According to the US EPA Region V, there is one Sole Source Aquifer (SSA) located in Illinois. The aquifer is known as "Mahomet

Aquifer" and is approximately 80 miles south of the subject property. Therefore, the subject property is not located in an area supported by an SSA.

Supporting documentation

[Sole Source Aquifers.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Wetlands Protection

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

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

No

✓ Yes

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

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

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

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

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

Screen Summary

Compliance Determination

The project will not impact on- or off-site wetlands. The project is in compliance with Executive Order 11990. The Wetlands map indicates that there are no designated wetland areas located on or near the subject property.

Supporting documentation

[Wetlands in COE\(portrait\).pdf](#)

[Wetlands in COE.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Wild and Scenic Rivers Act

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

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

No

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

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

Screen Summary

Compliance Determination

This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act. According to the National Wild and Scenic Rivers System, there are no scenic rivers in Cook County. The only scenic river in Illinois is the Vermillion River, which is located over 120 miles from the site.

Supporting documentation

[IL Wild Scenic Rivers as of 2014.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Environmental Justice

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

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

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

Yes

✓ No

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

Screen Summary

Compliance Determination

No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898. Environmental justice will not be an issue in the City of Evanston. The effects of the subject property will not cause disproportional adverse effects on minority and low-income neighborhoods as opposed to the community at large. The proposed project will provide much needed housing for low income individuals within the City of Evanston. The State's ability to offer community living hinges not only upon the availability of home and community-based services, but also the availability of accessible housing that is affordable. Because the project exposes no one to adverse environmental conditions, the project does not expose low income or minority populations to adverse environmental impacts.

Supporting documentation

[Environmental Justice Map.pdf](#)

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Are formal compliance steps or mitigation required?

Yes

✓ No