

## **NOTICE OF INTENT TO REQUEST RELEASE OF FUNDS**

June 18, 2020

City of Worcester's Executive Office of Economic Development  
City Hall, 4<sup>th</sup> Floor  
455 Main Street, Worcester, MA 01608  
(508) 799-1400 ext. 31431

On or about June 26 2020 the City of Worcester will submit a request to the US Department of Housing and Urban Development (HUD) for the release of Community Development Block Grant funds under Title 1 of the Housing and Community Development Act of 1974, Public Law 93-383, as amended; 42 U.S.C.-530.1 et seq., to undertake a project known as the CDBG Year 46 Affordable Housing Programs for the purpose of acquisition and or rehabilitation of existing single and multifamily residential buildings. The program consists of Lead Paint Abatement, Elder Home Rehabilitation program, Owner Occupied Rehabilitation Program, Rental Rehabilitation Program, Acquisition and or Rehabilitation of Rental Property, and Healthy Homes Improvements Program. The project will be managed by the City Manager's Executive Office of Economic Development, Housing Development Division. The City of Worcester's Executive Office of Economic Development is requesting the release of approximately \$1,250,000.00 of CDBG Funds for the period of July 1, 2020 through June 30, 2021.

The proposed activities to be funded under this program are categorically excluded from the National Environmental Policy Act requirements, but subject to compliance with some of the environmental laws and authorities listed at § 58.5 of 24 CFR Part 58. In accordance with §58.15, a tiered review process has been structured, whereby some environmental laws and authorities have been reviewed and studied for the intended target area(s) listed above. Other applicable environmental laws and authorities will be complied with, when individual projects are ripe for review. Specifically, the target area(s) has/have been studied and compliance with the following laws and authorities have been established in this Tier 1 review: Coastal Barrier Resources, Clean Air, Coastal Zone Management, Farmlands Protection, Noise Abatement and Control, Sole Source Aquifers, and Wild and Scenic Rivers. In the Tier 2 review, compliance with the following environmental laws and authorities will take place for proposed projects funded under the program(s) listed above: Airport Hazards, Flood Insurance, Contamination and Toxic Substances, Endangered Species, Explosive and Flammable Hazards, Floodplain Management, Historic Preservation, Wetlands Protection, and Environmental Justice. Individual Tier 2 environmental reviews will be conducted and available for review as addresses and projects are identified. Site addresses and backup information will be posted at:

<https://www.hudexchange.info/programs/environmental-review/environmental-review-records/>. Should individual aggregate projects exceed the threshold for categorical exclusion detailed at §58.35(a), an Environmental Assessment will be completed and a separate Finding of No Significant Impact and Request for Release of Funds published. Copies of the compliance documentation worksheets are available at the address below.

Additional project information is contained in the Environmental Review Record (ERR). The ERR will be made available to the public for review either electronically or by U.S. mail. Please submit your request by U.S. mail to James Brooks, Director, Housing Development Division, Executive Office of Economic Development, 455 Main St, 4th Floor, Worcester, MA 01608 or by email to [BrooksJ@worcesterma.gov](mailto:BrooksJ@worcesterma.gov). The ERR can be accessed online at the following website <http://www.worcesterma.gov/housing-neighborhood-development/community-development-block-grants/policies-procedures> and click "CDBG Resource Documents."



## PUBLIC COMMENTS


Any individual, group, or agency may submit written comments on the ERR to the City of Worcester's Executive Office of Economic Development. All comments received by June 25, 2020 will be considered by the City of Worcester's Executive Office of Economic Development prior to authorizing submission of a Request for Release of Funds and Environmental Certification to HUD.

## RELEASE OF FUNDS

The City of Worcester's Executive Office of Economic Development certifies to HUD that Andrew Taylor, in his official capacity as Assistant Chief Development Officer, Grants Management & Compliance for the City of Worcester's Executive Office of Economic Development, consents to accept the jurisdiction of the Federal Courts if an action is brought to enforce responsibilities in relation to the environmental review process and that these responsibilities have been satisfied. HUD's approval of the certification satisfies its responsibilities under NEPA and related laws and authorities, and allows the City of Worcester's Executive Office of Economic Development to utilize federal funds and implement the Program.

## OBJECTIONS TO RELEASE OF FUNDS

HUD will accept objections to its release of funds and the City of Worcester's certification for a period of **fifteen days** following the anticipated submission date or its actual receipt of the request (whichever is later) only if they are on one of the following bases: (a) the certification was not executed by the Certifying Officer of the City of Worcester; (b) the City of Worcester has omitted a step or failed to make a decision or finding required by HUD regulations at 24 CFR part 58; (c) the grant recipient or other participants in the development process have committed funds, incurred costs or undertaken activities not authorized by 24 CFR Part 58 before approval of a release of funds by HUD; or (d) another Federal agency acting pursuant to 40 CFR Part 1504 has submitted a written finding that the project is unsatisfactory from the standpoint of environmental quality. Objections must be prepared and submitted in accordance with the required procedures (24 CFR Part 58, Sec. 58.76) and shall be addressed to Thomas P. O'Neill, Jr. Federal Building, 10 Causeway Street, 3rd Floor, Boston, MA 02222-1092. Potential objectors should contact HUD to verify the actual last day of the objection period.



James Brooks,  
Director, Housing Development Division,  
Executive Office of Economic Development  
455 Main St, 4<sup>th</sup> Floor, Worcester MA. 01608





**CITY OF WORCESTER  
455 MAIN STREET  
WORCESTER, MA**

**Categorical Exclusion Subject to §58.5 Determination for Activities  
Listed at 24 CFR §58.35(a)**

Grant Recipient: City of Worcester: Executive Office of Economic Development, Housing Development Division

Project Name: CDBG Year 46 Affordable Housing Programs

Project Description (Include all actions which are either geographically or functionally related):

This is a program level review of the Year 46 Affordable Housing Activities funded through CDBG funds. Affordable Housing Programs include: Lead Paint abatement, elder rehabilitation, owner occupied rehabilitation, Rental Rehabilitation, Acquisition and/or Rehabilitation of Rental Property, and Healthy Homes Improvements.

Location: City of Worcester Geographic Service Area

Funding Source: CDBG HOME ESG HOPWA EDI Capital Fund Operating Subsidy Hope VI Other

Estimated Funding Amount: \$1,250,000.00 Grant Number: TBD

I have reviewed and determined that the above mentioned project is a Categorical Excluded activity (subject to §58.5) per 24 CFR §58.35(a) as follows:

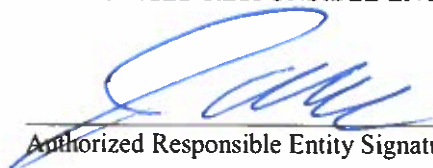
<input type="checkbox"/>	58.35(a) (1). Acquisition, repair, improvement, reconstruction, or rehabilitation of public facilities and improvements (other than buildings) when the facilities and improvements are in place and will be retained in the same use without change in size or capacity of more than 20 percent (e.g., replacement of water or sewer lines, reconstruction of curbs and sidewalks, repaving of streets);
<input checked="" type="checkbox"/>	58.35(a) (2). Special projects directed to the removal of material and architectural barriers that restrict the mobility of and accessibility to elderly and handicapped persons;
<input checked="" type="checkbox"/>	58.35(a) (3). Rehabilitation of buildings and improvements when the following conditions are met:
<input checked="" type="checkbox"/>	58.35(a) (3) (i.) In the case of a building for residential use (with one to four units), the density is not increased beyond four units, the land use is not changed, and the footprint of the building is not increased in a floodplain or in a wetland;
<input checked="" type="checkbox"/>	58.35(a) (3) (ii). In the case of multifamily residential buildings: (A) Unit density is not changed more than 20 percent; (B) The project does not involve changes in land use from residential to non-residential; and (C) The estimated cost of rehabilitation is less than 75 percent of the total estimated cost of replacement after rehabilitation.



<input type="checkbox"/>	58.35(a) (3) (iii). In the case of non-residential structures, including commercial, industrial, and public buildings: (A) The facilities and improvements are in place and will not be changed in size or capacity by more than 20 percent; <b>AND</b> (B) The activity does not involve a change in land use, such as from non-residential to residential, commercial to industrial, or from one industrial use to another.
<input checked="" type="checkbox"/>	58.35(a) (4) (i) An individual action [ACQUISITION] on up to four dwelling units where there is a maximum of four units on any one site. The units can be four one-unit buildings or one four-unit building or any combination in between; or
<input type="checkbox"/>	58.35(a) (4) (ii) An individual action on a project of five or more housing units developed on scattered sites when the sites are more than 2,000 feet apart and there are not more than four housing units on any one site. 58.35(a) (4) (iii) Paragraphs (a) (4) (i) and (ii) of this section do not apply to rehabilitation of a building for residential use (with one to four units) (see paragraph (a) (3) (i) of this section).
<input type="checkbox"/>	58.35(a) (5). Acquisition (including leasing) or disposition of, or equity loans on an existing structure, or acquisition (including leasing) of vacant land provided that the structure or land acquired, financed, or disposed of will be retained for the same use.
<input type="checkbox"/>	58.35(a) (6). Combinations of the above activities.

The responsible entity must also complete and attach a **§58.5 Statutory Checklist and Worksheet** and a **§58.6 Compliance Checklist**. By signing below the Responsible Entity officially determines in writing that all activities covered by this determination are Categorically Excluded (subject to §58.5) and meets the conditions specified for such exclusion under section 24 CFR §58.35(a). This document must be maintained in the ERR.

AUTHORIZED RESPONSIBLE ENTITY OFFICIAL:

  
Authorized Responsible Entity Signature

June 17, 2020  
Date

James Brooks  
Authorized Responsible Entity Name (printed)

Director, Housing Development Division  
Title (printed)



# City of Worcester, Massachusetts

Edward M. Augustus, Jr.  
City Manager



Peter Dunn  
Chief Development Officer  
Executive Office of Economic Development

James Brooks, Director  
Housing Development Division

## STATEMENT

### ENVIRONMENTAL REVIEW RECORD

This is a program level review of the CDBG Year 46 Affordable Housing Programs. The CDBG Affordable Housing Program uses CDBG funds to fund the Lead Paint Abatement, Elder Rehabilitation, Owner Occupied Rehabilitation, Rental Rehabilitation, Acquisition and/or Rehabilitation of Rental Property, and Healthy Homes improvements. These programs will improve the City's housing stock as well as the safety of Worcester residents.

*58.35(a) (2). Special projects directed to the removal of material and architectural barriers that restrict the mobility of and accessibility to elderly and handicapped persons;*


*58.35(a) (3). Rehabilitation of buildings and improvements when the following conditions are met:*

*58.35(a) (3) (i.) In the case of a building for residential use (with one to four units), the density is not increased beyond four units, the land use is not changed, and the footprint of the building is not increased in a floodplain or in a wetland;*

*58.35(a) (3) (ii). In the case of multifamily residential buildings: (A) Unit density is not changed more than 20 percent; (B) The project does not involve changes in land use from residential to non-residential; and (C) The estimated cost of rehabilitation is less than 75 percent of the total estimated cost of replacement after rehabilitation.*

*58.35(a) (4) (i) An individual action [ACQUISITION] on up to four dwelling units where there is a maximum of four units on any one site. The units can be four one-unit buildings or one four-unit building or any combination in between; or*





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Hung Nguyen  
Housing Program Coordinator

6/16/2020  
Date



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James Brooks  
Director, Housing Development Division

6/16/2020  
Date



# **Environmental Review for Activity/Project that is Categorically Excluded Subject to Section 58.5**

**Pursuant to 24 CFR 58.35(a)**

## **Project Information**

**Project Name:** CDBG Year 46 Affordable Housing Programs

**Responsible Entity:** City of Worcester, Executive Office of Economic Development

**Preparer:** Hung Nguyen, Housing Programs Coordinator

**Certifying Officer Name and Title:** James Brooks, Director, Housing Development Division

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

**Direct Comments to:**

**Project Location:** To be determined, but within the City of Worcester, MA

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

This is a program level review of the CDBG Year 46 Affordable Housing Programs. The CDBG Affordable Housing Program uses CDBG funds to fund the Lead Paint Abatement, Elder Rehabilitation, Owner Occupied Rehabilitation, Rental Rehabilitation, Acquisition and/or Rehabilitation of Rental Property, and Healthy Homes improvements. These programs will improve the City's housing stock as well as the safety of Worcester residents.

### **Level of Environmental Review Determination:**

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

*58.35(a) (2). Special projects directed to the removal of material and architectural barriers that restrict the mobility of and accessibility to elderly and handicapped persons;*

*58.35(a) (3). Rehabilitation of buildings and improvements when the following conditions are met:*

*58.35(a) (3) (i.) In the case of a building for residential use (with one to four units), the density is not increased beyond four units, the land use is not changed, and the footprint of the building is not increased in a floodplain or in a wetland;*

*58.35(a) (3) (ii). In the case of multifamily residential buildings: (A) Unit density is not changed more than 20 percent; (B) The project does not involve changes in land use from residential to non-residential; and (C) The estimated cost of rehabilitation is less than 75 percent of the total estimated cost of replacement after rehabilitation.*



58.35(a) (4) (i) An individual action [ACQUISITION] on up to four dwelling units where there is a maximum of four units on any one site. The units can be four one-unit buildings or one four-unit building or any combination in between; or

### **Funding Information**

<b>*Grant Number</b>	<b>*HUD Program</b>	<b>*Funding Amount</b>
TBD	CDBG	Est. \$1,250,000.00

**\*Estimated Total HUD Funded Amount:** Est. \$1,250,000.00

**\*Estimated Total Project Cost (HUD and non-HUD funds):** Est. \$1,250,000.00

### **Compliance with 24 CFR 58.5 and 58.6 Laws and Authorities**

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

<b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 58.6</b>		
<b>Airport Hazards</b>  24 CFR Part 51 Subpart D	Yes   No <input checked="" type="checkbox"/> <input type="checkbox"/>	* For compliance plan, see note 1 attached.
<b>Coastal Barrier Resources</b>  Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes   No <input type="checkbox"/> <input checked="" type="checkbox"/>	See attached completed checklist (note 2) and determination that the City of Worcester Service area is far outside the Coastal Barrier Resource Area.
<b>Flood Insurance</b>  Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes   No <input checked="" type="checkbox"/> <input type="checkbox"/>	* For compliance plan, see note 3 attached.



**STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5**

<b>Clean Air</b>  Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	See attached completed checklist (note 4) and determination that the program only includes acquisition and or rehabilitation activities to smaller residential projects, if a larger project is identified the ERR will be reevaluated to include all activities which could trigger clean air review.
<b>Coastal Zone Management</b>  Coastal Zone Management Act, sections 307(c) & (d)	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	See attached completed checklist (note 5) and determination that the City of Worcester Service area is far outside the Coastal Zone Management Area.
<b>Contamination and Toxic Substances</b>  24 CFR 58.5(i)(2)	Yes    No <input checked="" type="checkbox"/> <input type="checkbox"/>	* For compliance plan, see note 6a for single family or 6b for multifamily, non-residential attached.
<b>Endangered Species</b>  Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes    No <input checked="" type="checkbox"/> <input type="checkbox"/>	* For compliance plan, see note 7 attached.
<b>Explosive and Flammable Hazards</b>  24 CFR Part 51 Subpart C	Yes    No <input checked="" type="checkbox"/> <input type="checkbox"/>	* For compliance plan, see note 8 attached.
<b>Farmlands Protection</b>  Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	See attached completed checklist (note 9) and determination that project involves rehabilitation of previously developed parcels of land and does not include any activities that could convert agricultural land to a non-agricultural use.
<b>Floodplain Management</b>  Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes    No <input checked="" type="checkbox"/> <input type="checkbox"/>	* For compliance plan, see note 10 attached.
<b>Historic Preservation</b>  National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes    No <input checked="" type="checkbox"/> <input type="checkbox"/>	* For compliance plan, see note 11 attached.
<b>Noise Abatement and Control</b>	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	See attached completed checklist (note 12) and determination that project will only involve the rehabilitation of existing



24 CFR Part 51 Subpart B		structures. It will not include new construction for residential use, rehabilitation of an existing residential property, or a research demonstration project.
<b>Sole Source Aquifers</b>  Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	See attached completed checklist (note 13) and determination that the City of Worcester does not contain and is not near a sole source aquifer system.
<b>Wetlands Protection</b>  Executive Order 11990, particularly sections 2 and 5; 24 CFR Part 55 wetlands provisions	Yes    No <input checked="" type="checkbox"/> <input type="checkbox"/>	* For compliance plan, see note 14 attached.
<b>Wild and Scenic Rivers</b>  Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	See attached completed checklist (note 15) and determination that there are no Wild and Scenic Rivers located within the City of Worcester.
<b>ENVIRONMENTAL JUSTICE</b>		
<b>Environmental Justice</b>  Executive Order 12898	Yes    No <input checked="" type="checkbox"/> <input type="checkbox"/>	* For compliance plan, see note 16 attached.

### **Mitigation Measures and Conditions**

Summarize below all mitigation measures either taken or required as a condition of approval of the project 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.

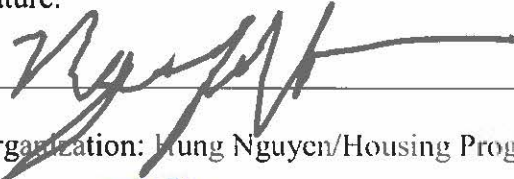
Law, Authority, or Factor	Mitigation Measure
	<i>Publish NOI/RROF</i>



**\*Determination:**

- ☐ This categorically excluded activity/project converts to **EXEMPT** per Section 58.34(a)(12), because it does not require any mitigation for compliance with any listed statutes or authorities, nor requires any formal permit or license; **Funds may be committed and drawn down** for this (now) EXEMPT project; OR
- ☒ This categorically excluded activity/project cannot convert to Exempt status because one or more statutes or authorities listed at Section 58.5 requires formal consultation or mitigation. Complete consultation/mitigation protocol requirements, **publish NOI/RROF, submit RROF (HUD 7015.15), and obtain "Authority to Use Grant Funds"** (HUD 7015.16) per Section 58.70 and 58.71 before committing or drawing down any funds; OR
- ☐ This project is not categorically excluded OR, if originally categorically excluded, is now subject to a full Environmental Assessment according to Part 58 Subpart E due to extraordinary circumstances (Section 58.35(c)).

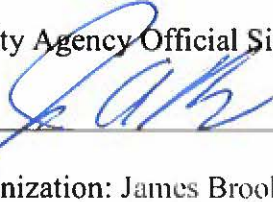
Preparer Signature:



Date: June 16, 2020

Name/Title/Organization: Hung Nguyen/Housing Program Coordinator /Division of Housing

Responsible Entity Agency Official Signature:



Date: June 17, 2020

Name/Title/Organization: James Brooks/Director, Housing Development Division

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



## Note 1 Airport Hazards

For compliance, the following checklist will be completed at the project level.

### Airport Hazards (CEST and EA)

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

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

☐ Yes → Continue to Question 2.

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

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

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

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

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

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

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

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

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

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



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

**Explain approval process:**

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

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

### **Worksheet Summary**

#### **Compliance Determination**

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

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

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

- ☐ Yes  
☐ No



## Note 2 Coastal Barrier Resources

For compliance the following checklist has been completed for all Affordable Housing activities as described above at the program level.

### Coastal Barrier Resources (CEST and EA)

#### 1. Is the project located in a CBRS Unit?

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

☐ Yes → *Continue to Question 2.*

Federal assistance for most activities may not be used at this location. You must either choose an alternate site or cancel the project. In very rare cases, federal monies can be spent within CBRS units for certain exempted activities (e.g., a nature trail), after consultation with the Fish and Wildlife Service (FWS) (see 16 USC 3505 for exceptions to limitations on expenditures).

#### 2. Indicate your selected course of action.

☐ After consultation with the FWS the project was given approval to continue  
→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map and documentation of a FWS approval.*

☐ Project was not given approval  
Project cannot proceed at this location.

### Worksheet Summary

#### Compliance Determination

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

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

See attached map showing the City of Worcester Service area is far outside the Coastal Barrier Resource Area.



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

☐ Yes


☒ No



# City of Worcester Service Area in Relation to Coastal Barrier Resources & Coastal Zone Area

**N**

**City of Worcester**  
Executive Office of Economic Development,  
Housing Development Division



0 3 6 12 18 24  
Miles



### Note 3 Flood Insurance

For compliance, the following checklist will be completed at the project level.

#### Flood Insurance (CEST and EA)

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).
Reference		
<a href="https://www.hudexchange.info/environmental-review/flood-insurance">https://www.hudexchange.info/environmental-review/flood-insurance</a>		

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. →  
*Continue to the Worksheet Summary.*

☐ Yes → *Continue to Question 2.*

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

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

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

☐ No → *Continue to the Worksheet Summary.*

☐ Yes → *Continue to Question 3.*

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

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

For loans, loan insurance or loan guarantees, flood insurance coverage must be continued for the term of the loan. For grants and other non-loan forms of financial assistance, flood insurance coverage must be continued for the life of the building



irrespective of the transfer of ownership. The amount of coverage must equal the total project cost or the maximum coverage limit of the National Flood Insurance Program, whichever is less

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

→ *Continue to the Worksheet Summary.*

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

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

→ *Continue to the Worksheet Summary.*

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

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

### **Worksheet Summary**

#### **Compliance Determination**

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

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

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

☐ Yes

☐ No



#### Note 4 Air Quality (Clean Air)

**For compliance the following checklist has been completed for all Affordable Housing activities as described above at the program level.**

## Air Quality (CEST and EA)

## Scope of Work

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

☐ Yes

→ Continue to Question 2.

☒ No

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

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

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

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

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

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

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

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

**Describe the findings:**

[illegible]



→ Continue to Question 3.

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

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

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

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

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

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

#### Worksheet Summary

##### **Compliance Determination**

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

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

The project only includes acquisition and or rehabilitation activities to smaller residential properties, if a larger project is identified the ERR will be reevaluated to include all activities.



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

☐ Yes

☒ No



### Note 5 Coastal Zone Management

**For compliance the following checklist has been completed for all Affordable Housing activities as described above at the program level.**

## Coastal Zone Management Act (CEST and EA)

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

☐ Yes → *Continue to Question 2.*

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

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

☐ Yes → *Continue to Question 3.*

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

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

☐ Yes, with mitigation. → Continue to Question 4.

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

☐ No, project must be canceled.

Project cannot proceed at this location.

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

\_\_\_\_\_



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

### **Worksheet Summary**

#### **Compliance Determination**

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

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

See attached map showing the City of Worcester Service area is far outside the Coastal Zone Management Area.

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

☐ Yes


☒ No



# City of Worcester Service Area in Relation to Coastal Barrier Resources & Coastal Zone Area

**N**

**City of Worcester**  
Executive Office of Economic Development,  
Housing Development Division



0 3 6 12 18 24  
Miles



## Note 6a Contamination and Toxic Substances (Single Family Properties)

For compliance, the following checklist will be completed at the project level.

### Contamination and Toxic Substances (Single Family Properties)

- 1. Evaluate the site for contamination. 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?**

Provide a map or other documentation of absence or presence of contamination<sup>1</sup> and explain evaluation of site contamination in the Worksheet below.

☐ No

**Explain:**

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

☐ Yes

→ *Describe the findings, including any recognized environmental conditions (RECs), in Worksheet Summary below. Continue to Question 2.*

Check here if an ASTM Phase I Environmental Site Assessment (ESA) report was utilized. [Note: HUD regulations does not require an ASTM Phase I ESA report for single family homes]

### 2. Mitigation

---

<sup>1</sup> Utilize EPA's Enviromapper and 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.



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

**Can adverse environmental impacts be mitigated?**

☐ Adverse environmental impacts cannot feasibly be mitigated

→ Project cannot proceed at this location.

☐ Yes, adverse environmental impacts can be eliminated through mitigation.

→ *Provide all mitigation requirements<sup>2</sup> and documents. Continue to Question 3.*

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

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

☐ Complete removal

☐ Risk-based corrective action (RBCA)

☐ Other

→ *Continue to the Worksheet Summary.*

**Worksheet Summary**

---

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

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

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



### **Compliance Determination**

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

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

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

☐ Yes

☐ No



**Note 6b Contamination and Toxic Substances (Multifamily and Non-Residential Properties)**

**For compliance, the following checklist will be completed at the project level.**

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

**1. How was site contamination evaluated?<sup>5</sup> Select all that apply.**

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

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

*Continue to Question 2.*

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

- ☐ No

**Explain:**

*Continue to the Worksheet Summary below.*

- ☐ Yes.

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

---

<sup>5</sup> HUD regulations at 24 CFR § 58.5(i)(2)(ii) require that the environmental review for multifamily housing with five or more dwelling units or non-residential property include the evaluation of previous uses of the site or other evidence of contamination on or near the site. For acquisition and new construction of multifamily and nonresidential properties HUD strongly advises the review include an ASTM Phase I Environmental Site Assessment (ESA) to meet real estate transaction standards of due diligence and to help ensure compliance with HUD's toxic policy at 24 CFR §58.5(i) and 24 CFR §50.3(i). Also note that some HUD programs require an ASTM Phase I ESA.



### 3. Mitigation

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

#### Can adverse environmental impacts be mitigated?

☐ Adverse environmental impacts cannot feasibly be mitigated

→ Project cannot proceed at this location.

☐ Yes, adverse environmental impacts can be eliminated through mitigation.

→ *Provide all mitigation requirements<sup>6</sup> and documents. Continue to Question 4.*

### 4. Describe how compliance was achieved. Include any of the following that apply: State Voluntary Clean-up Program, a No Further Action letter, use of engineering controls<sup>7</sup>, or use of institutional controls<sup>8</sup>.

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

☐ Complete removal

→ *Continue to the Worksheet Summary.*

☐ Risk-based corrective action (RBCA)

→ *Continue to the Worksheet Summary.*

---

<sup>6</sup> Mitigation requirements include all clean-up actions required by applicable federal, state, tribal, or local law. Additionally, provide, as applicable, the long-term operations and maintenance plan, Remedial Action Work Plan, and other equivalent documents.

<sup>7</sup> Engineering controls are any physical mechanism used to contain or stabilize contamination or ensure the effectiveness of a remedial action. Engineering controls may include, without limitation, caps, covers, dikes, trenches, leachate collection systems, signs, fences, physical access controls, ground water monitoring systems and ground water containment systems including, without limitation, slurry walls and ground water pumping systems.

<sup>8</sup> Institutional controls are mechanisms used to limit human activities at or near a contaminated site, or to ensure the effectiveness of the remedial action over time, when contaminants remain at a site at levels above the applicable remediation standard which would allow for unrestricted use of the property. Institutional controls may include structure, land, and natural resource use restrictions, well restriction areas, classification exception areas, deed notices, and declarations of environmental restrictions.



## **Worksheet Summary**

### **Compliance Determination**

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

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

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

☐ Yes

☐ No



## Note 7 Endangered Species Act

For compliance, the following checklist will be completed at the project level.

### Endangered Species Act (CEST and EA)

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

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

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

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

Explain your determination:

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

☐ Yes, the activities involved in the project have the potential to affect species and/or habitats. → *Continue to Question 2.*

**2. Are federally listed species or designated critical habitats present in the action area?**

Obtain a list of protected species from the Services. This information is available on the FWS Website or you may contact your local FWS and/or NMFS offices directly.

☐ No, the project will have No Effect due to the absence of federally listed species and designated critical habitat.

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination. Documentation may include letters from the Services, species lists from the Services' websites, surveys or other documents and analysis showing that there are no species in the action area.*

☐ Yes, there are federally listed species or designated critical habitats present in the action area. → *Continue to Question 3.*



**3. What effects, if any, will your project have on federally listed species or designated critical habitat?**

- ☐ No Effect: Based on the specifics of both the project and any federally listed species in the action area, you have determined that the project will have absolutely no effect on listed species or critical habitat.

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination. Documentation should include a species list and explanation of your conclusion, and may require maps, photographs, and surveys as appropriate.*

- ☐ May Affect, Not Likely to Adversely Affect: Any effects that the project may have on federally listed species or critical habitats would be beneficial, discountable, or insignificant.

→ *Continue to Question 4, Informal Consultation.*

- ☐ Likely to Adversely Affect: The project may have negative effects on one or more listed species or critical habitat.

→ *Continue to Question 5, Formal Consultation.*

**4. Informal Consultation is required**

Section 7 of ESA (16 USC. 1536) mandates consultation to resolve potential impacts to endangered and threatened species and critical habitats. If a HUD-assisted project may affect any federally listed endangered or threatened species or critical habitat, then compliance is required with Section 7. See 50 CFR Part 402 Subpart B Consultation Procedures.

**Did the Service(s) concur with the finding that the project is Not Likely to Adversely Affect?**

- ☐ Yes, the Service(s) concurred with the finding.

→ *Based on the response, the review is in compliance with this section. Continue to Question 6 and provide the following:*

- (1) A biological evaluation or equivalent document*
- (2) Concurrence(s) from FWS and/or NMFS*
- (3) Any other documentation of informal consultation*

*Exception: If finding was made based on procedures provided by a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office, provide whatever documentation is mandated by that agreement.*

- ☐ No, the Service(s) did not concur with the finding. → *Continue to Question 5.*

**5. Formal consultation is required**



Section 7 of ESA (16 USC 1536) mandates consultation to resolve potential impacts to federally listed endangered and threatened species and critical habitats. If a HUD assisted project may affect any endangered or threatened species or critical habitat, then compliance is required with Section 7. See 50 CFR Part 402 Subpart B Consultation Procedures.

→ Once consultation is complete, the review is in compliance with this section. Continue to Question 6 and provide the following:

- (1) A biological assessment, evaluation, or equivalent document
- (2) Biological opinion(s) issued by FWS and/or NMFS
- (3) Any other documentation of formal consultation

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

☐ Mitigation as follows will be implemented:

☐ No mitigation is necessary.

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

### **Worksheet Summary**

#### **Compliance Determination**

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

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



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

☐ Yes

☐ No



## Note 8 Explosive and Flammable Hazards

For compliance, the following checklist will be completed at the project level.

### Explosive and Flammable Hazards (CEST and EA)

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

☐ No

→ Continue to Question 2.

☐ Yes

Explain:

→ Continue to Question 5.

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

☐ No

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

☐ Yes

→ Continue to Question 3.

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

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

☐ No

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

☐ Yes

→ Continue to Question 4.



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

Please visit HUD's website for information on calculating Acceptable Separation Distance.

- ☐
- Yes

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide map(s) showing the location of the project site relative to any tanks and your separation distance calculations. If the map identifies more than one tank, please identify the tank you have chosen as the "assessed tank."

- ☐
- No

→ Provide map(s) showing the location of the project site relative to any tanks and your separation distance calculations. If the map identifies more than one tank, please identify the tank you have chosen as the "assessed tank."  
Continue to Question 6.

**5. Is the hazardous facility located at an acceptable separation distance from residences and any other facility or area where people may congregate or be present?**

Please visit HUD's website for information on calculating Acceptable Separation Distance.

- ☐
- Yes

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide map(s) showing the location of the project site relative to residences and any other facility or area where people congregate or are present and your separation distance calculations.

- ☐
- No

→ Provide map(s) showing the location of the project site relative to residences and any other facility or area where people congregate or are present and your separation distance calculations.

Continue to Question 6.

**6. For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the exact measures that must be implemented to make the Separation Distance acceptable, including the timeline for implementation. If negative effects cannot be mitigated, cancel the project at this location.**

**Note that only licensed professional engineers should design and implement blast barriers. If a barrier will be used or the project will be modified to compensate for an unacceptable separation distance, provide approval from a licensed professional engineer.**

\_\_\_\_\_



### **Worksheet Summary**

#### **Compliance Determination**

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

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

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

☐ Yes

☐ No



## Note 9 Farmland Protection

For compliance the following checklist has been completed for all Affordable Housing activities as described above at the program level.

### Farmlands Protection (CEST and EA)

1. Does your project include any activities, including new construction, acquisition of undeveloped land or conversion, that could convert agricultural land to a non-agricultural use?

☐ Yes → Continue to Question 2.

☒ No

**Explain how you determined that agricultural land would not be converted:**

Project involves acquisition and or rehabilitation of previously developed properties.

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

2. Does "important farmland," including prime farmland, unique farmland, or farmland of statewide or local importance regulated under the Farmland Protection Policy Act, occur on the project site?

You may use the links below to determine important farmland occurs on the project site:

- Utilize USDA Natural Resources Conservation Service's (NRCS) Web Soil Survey <http://websoilsurvey.nrcs.usda.gov/app/HomePage.htm>
- Check with your city or county's planning department and ask them to document if the project is on land regulated by the FPPA (zoning important farmland as non-agricultural does not exempt it from FPPA requirements)
- Contact NRCS at the local USDA service center <http://offices.sc.egov.usda.gov/locator/app?agency=nrcs> or your NRCS state soil scientist [http://soils.usda.gov/contact/state\\_offices/](http://soils.usda.gov/contact/state_offices/) for assistance

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

☐ Yes → Continue to Question 3.

3. Consider alternatives to completing the project on important farmland and means of avoiding impacts to important farmland.

- Complete form AD-1006, "Farmland Conversion Impact Rating" [http://www.nrcs.usda.gov/Internet/FSE\\_DOCUMENTS/stelprdb1045394.pdf](http://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb1045394.pdf) and



contact the state soil scientist before sending it to the local NRCS District Conservationist.

(NOTE: for corridor type projects, use instead form **NRCS-CPA-106**, "Farmland Conversion Impact Rating for Corridor Type Projects: [http://www.nrcs.usda.gov/Internet/FSE\\_DOCUMENTS/stelprdb1045395.pdf](http://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb1045395.pdf).)

- Work with NRCS to minimize the impact of the project on the protected farmland. When you have finished with your analysis, return a copy of form AD-1006 (or form NRCS-CPA-106 if applicable) to the USDA-NRCS State Soil Scientist or his/her designee informing them of your determination.

**Document your conclusion:**

- ☐ Project will proceed with mitigation.

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

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide form AD-1006 and all other documents used to make your determination.*

- ☐ Project will proceed without mitigation.

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

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide form AD-1006 and all other documents used to make your determination.*

**Worksheet Summary**

**Compliance Determination**

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

- Map panel numbers and dates



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

Project involves acquisition and or rehabilitation of previously developed properties and does not include any activities that could convert agricultural land to a non-agricultural use.

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

☐ Yes

☒ No



## Note 10 Floodplain Management

For compliance, the following checklist will be completed at the project level.

### Floodplain Management (CEST and EA)

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

☐ Yes

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

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

☐ No → Continue to Question 2.

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

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

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

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

☐ Yes

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

☐ Floodway → Continue to Question 3, Floodways

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

☐ 500-year floodplain (B Zone or shaded X Zone) → Continue to Question 5, 500-year Floodplains

☐ 100-year floodplain (A Zone) → The 8-Step Process is required. Continue to Question 6, 8-Step Process



### 3. **Floodways**

**Is this a functionally dependent use?**

☐ Yes

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

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

☐ No

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

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

**Is this a critical action?**

☐ Yes

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

☐ No

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

☐ Yes, there is new construction.

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

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

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

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

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

**Is this a critical action?**

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



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

**6. 8-Step Process.**

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

☐ 8-Step Process applies.

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

→ *Continue to Question 7, Mitigation*

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

Provide documentation of 5-Step Process.

Select the applicable citation:

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

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

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

☐ 55.12(a)(4) HUD's (or the recipient's) actions under any HUD program involving the repair, rehabilitation, modernization, weatherization, or improvement of existing nonresidential buildings and structures, in communities that are in the Regular Program of the NFIP and are in good standing, provided that the action does not meet the thresholds for "substantial improvement" under § 55.2(b)(10) and that the footprint of the structure and paved areas is not significantly increased.

→ *Continue to Question 7, Mitigation*

☐ 8-Step Process is inapplicable per 55.12(b)(1-4).



Select the applicable citation:

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

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

## 7. **Mitigation**

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



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

- ☐ Permeable surfaces
- ☐ Natural landscape enhancements that maintain or restore natural hydrology
- ☐ Planting or restoring native plant species
- ☐ Bioswales
- ☐ Evapotranspiration
- ☐ Stormwater capture and reuse
- ☐ Green or vegetative roofs with drainage provisions
- ☐ Natural Resources Conservation Service conservation easements or similar easements
- ☐ Floodproofing of structures
- ☐ Elevating structures including freeboarding above the required base flood elevations
- ☐ Other

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

### **Worksheet Summary**

#### **Compliance Determination**

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

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



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

☐ Yes

☐ No



## Note 11 Historic Preservation

For compliance, the following checklist will be completed at the project level.

### Historic Preservation (CEST and EA)

#### 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.)

**Either provide the PA itself or a link to it here. Mark the applicable exemptions or include the text here:**

→ *Continue to the Worksheet Summary.*

- ☐ 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)].

**Either provide the memo itself or a link to it here. Explain and justify the other determination here:**

→ *Continue to the Worksheet Summary.*

- ☐ Yes, because the project includes activities with potential to cause effects (direct or indirect). → *Continue to Step 1.*

#### **The Section 106 Process**

After determining the need to do a Section 106 review, initiate consultation with regulatory and other interested parties, identify and evaluate historic properties, assess effects of the



project on properties listed on or eligible for the National Register of Historic Places, and resolve any adverse effects through project design modifications or mitigation.

Note that consultation continues through all phases of the review.

Step 1: Initiate consultation

Step 2: Identify and evaluate historic properties

Step 3: Assess effects of the project on historic properties

Step 4: Resolve any adverse effects

### Step 1 - Initiate Consultation

The following parties are entitled to participate in Section 106 reviews: Advisory Council on Historic Preservation; State Historic Preservation Officers (SHPOs); federally recognized Indian tribes/Tribal Historic Preservation Officers (THPOs); Native Hawaiian Organizations (NHOs); local governments; and project grantees. The general public and individuals and organizations with a demonstrated interest in a project may participate as consulting parties at the discretion of the RE or HUD official. Participation varies with the nature and scope of a project. Refer to HUD's website for guidance on consultation, including the required timeframes for response. Consultation should begin early to enable full consideration of preservation options.

Use the When To Consult With Tribes checklist within Notice CPD-12-006: Process for Tribal Consultation to determine if you should invite tribes to consult on a particular project. Use the Tribal Directory Assessment Tool (TDAT) to identify tribes that may have an interest in the area where the project is located. Note that consultants may not initiate consultation with Tribes.

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

- ☐ State Historic Preservation Officer (SHPO)
- ☐ Advisory Council on Historic Preservation
- ☐ Indian Tribes, including Tribal Historic Preservation Officers (THPOs) or Native
- ☐ Hawaiian Organizations (NHOs)

**List all tribes that were consulted here and their status of consultation:**

- ☐ Other Consulting Parties

**List all consulting parties that were consulted here and their status of consultation:**

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



*Provide all correspondence, notices, and notes (including comments and objections received) and continue to Step 2.*

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

**Define the Area of Potential Effect (APE), either by entering the address(es) or providing a map depicting the APE.** Attach an additional page if necessary.



Gather information about known historic properties in the APE. Historic buildings, districts and archeological sites may have been identified in local, state, and national surveys and registers, local historic districts, municipal plans, town and county histories, and local history websites. If not already listed on the National Register of Historic Places, identified properties are then evaluated to see if they are eligible for the National Register.

Refer to HUD's website for guidance on identifying and evaluating historic properties.

**In the space below, list historic properties identified and evaluated in the APE.**

Every historic property that may be affected by the project should be listed. For each historic property or district, include the National Register status, whether the SHPO has concurred with the finding, and whether information on the site is sensitive. Attach an additional page if necessary.



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

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

If the APE contains previously unsurveyed buildings or structures over 50 years old, or there is a likely presence of previously unsurveyed archeological sites, a survey may be necessary. For Archeological surveys, refer to HP Fact Sheet #6, Guidance on Archeological Investigations in HUD Projects.



- ☐ Yes → *Provide survey(s) and report(s) and continue to Step 3.*

Additional notes:

- ☐ No → *Continue to Step 3.*

### **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 HUD guidance.

**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

**Document reason for finding:**

- ☐ No historic properties present. → *Provide concurrence(s) or objection(s) and continue to the Worksheet Summary.*
- ☐ Historic properties present, but project will have no effect upon them. → *Provide concurrence(s) or objection(s) and continue to the Worksheet Summary.*

If consulting parties concur or fail to respond to user's request for concurrence, project is in compliance with this section. No further review is required. If consulting parties object, refer to (36 CFR 800.4(d)(1)) and consult further to try to resolve objection(s).

- ☐ No Adverse Effect

**Document reason for finding:**

**Does the No Adverse Effect finding contain conditions?**



☐ Yes

**Check all that apply:** (check all that apply)

- ☐ Avoidance
- ☐ Modification of project
- ☐ Other

**Describe conditions here:**

→ *Monitor satisfactory implementation of conditions. Provide concurrence(s) or objection(s) and continue to the Worksheet Summary.*

☐ No → *Provide concurrence(s) or objection(s) and continue to the Worksheet Summary.*

If consulting parties concur or fail to respond to user's request for concurrence, project is in compliance with this section. No further review is required. If consulting parties object, refer to (36 CFR 800.5(c)(2)) and consult further to try to resolve objection(s).

☐ Adverse Effect

**Document reason for finding:**

Copy and paste applicable Criteria into text box with summary and justification.

Criteria of Adverse Effect: 36 CFR 800.5]

Notify the Advisory Council on Historic Preservation of the Adverse Effect and provide the documentation outlined in 36 CFR 800.11(e). The Council has 15 days to decide whether to enter the consultation (Not required for projects covered by a Programmatic Agreement).

→ *Continue to Step 4.*

#### **Step 4 - Resolve Adverse Effects**

Work with consulting parties to try to avoid, minimize or mitigate adverse effects. Refer to HUD 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:**

**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.**

*→ Provide signed Memorandum of Agreement (MOA) or Standard Mitigation Measures Agreement (SMMA). Continue to the Worksheet Summary.*

☐ No

The project must be cancelled unless the "Head of Agency" approves it. Either provide approval from the "Head of Agency" or cancel the project at this location.

**Describe the failure to resolve Adverse Effects, including consultation efforts and participation by the Advisory Council on Historic Preservation and "Head of the Agency":**



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



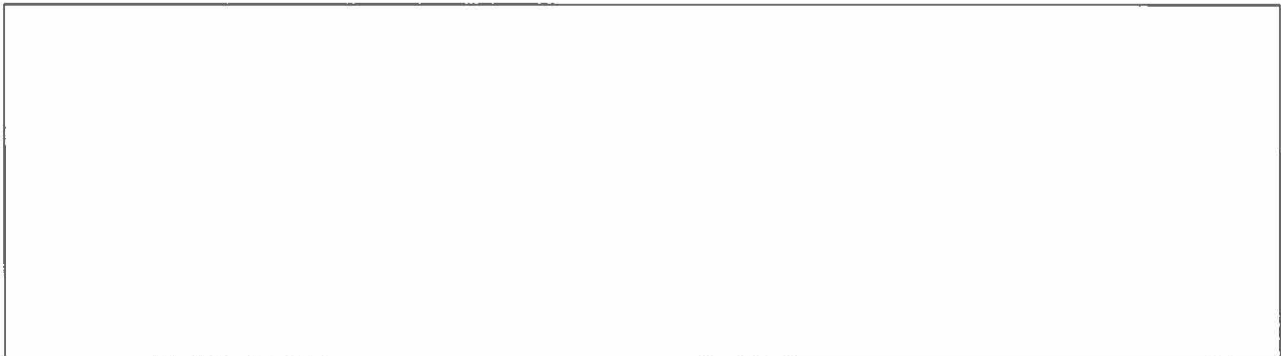
→ *Provide correspondence, comments, documentation of decision, and "Head of Agency" approval. Continue to the Worksheet Summary.*

### **Worksheet Summary**

#### **Compliance Determination**

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

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



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

☐ Yes

☐ No



### Note 12 Noise Abatement and Control

**For compliance the following checklist has been completed for all Affordable Housing activities as described above at the program level.**

### Noise (CEST Level Reviews)

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

- ☐
- New construction for residential use

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

→ Continue to Question 4.

- ☒
- Rehabilitation of an existing residential property

NOTE: For modernization projects in all noise zones, HUD encourages mitigation to reduce levels to acceptable compliance standards. See 24 CFR 51 Subpart B for further details.

→ Continue to Question 2.

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

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

- ☐
- None of the above

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

**2. Do you have standardized noise attenuation measures that apply to all modernization and/or minor rehabilitation projects, such as the use of double glazed windows or extra insulation?**

- ☒
- Yes

**Indicate the type of measures that will apply (check all that apply):**

- ☑ Improved building envelope components (better windows and doors, strengthened sheathing, insulation, sealed gaps, etc.)
- ☑ Redesigned building envelope (more durable or substantial materials, increased air gap, resilient channels, staggered wall studs, etc.)

- ☐
- Other

**Explain:**

\_\_\_\_\_



→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below and provide any supporting documentation.

☐ No

→ Continue to Question 3.

3. 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).

Describe findings of the Preliminary Screening:

→ Continue to Question 6.

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. Continue to the Worksheet Summary below. Provide a map showing the location of the project relative to any noise generators.

☐ Noise generators were found within the threshold distances.

→ Continue to Question 5.

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

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

Indicate noise level here:

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



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

Indicate noise level here:

**Is the project in a largely undeveloped area<sup>9</sup>?**

- ☐ No

*→ Your project requires completion of an Environmental Assessment (EA) pursuant to 51.104(b)(1)(i). Elevate this review to an EA-level review.*

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

*Continue to Question 6.*

- ☐ Yes

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

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

*Continue to Question 6.*

- ☐ Unacceptable: (Above 75 decibels)

Indicate noise level here:

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

- ☐ Convert to an EIS

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

*Continue to Question 6.*

- ☐ Provide waiver

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

*Continue to Question 6.*

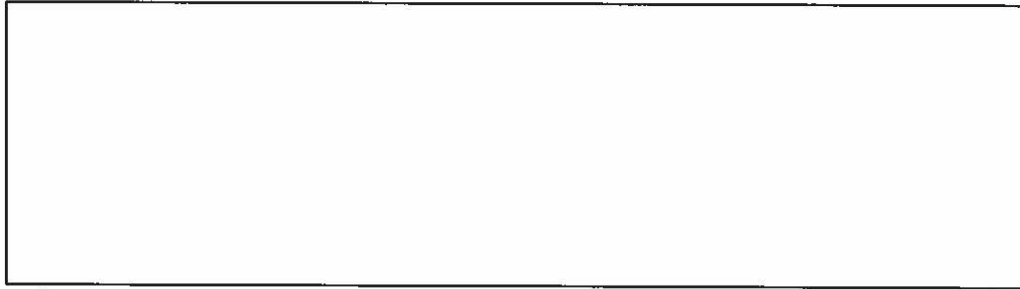
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<sup>9</sup> A largely undeveloped area means the area within 2 miles of the project site is less than 50 percent developed with urban uses and does not have water and sewer capacity to serve the project.



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.

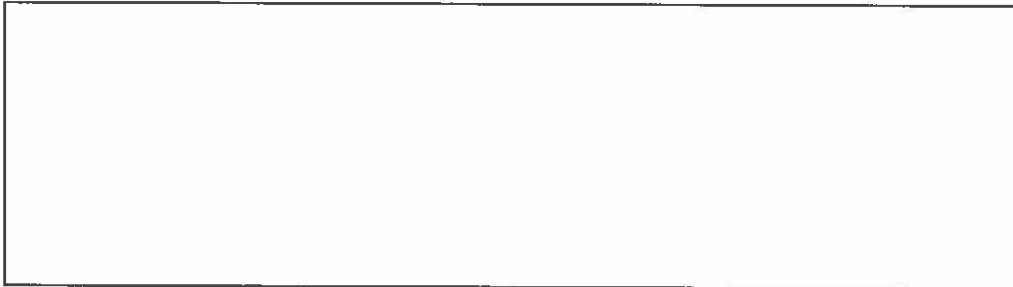
☐ Mitigation as follows will be implemented:



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

☐ No mitigation is necessary.

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



→ Continue to the Worksheet Summary.

### **Worksheet Summary**

#### **Compliance Determination**

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

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

Project will only involve the rehabilitation of existing structures. Please see attached HOME rehabilitation standards that will be applied to CDBG Affordable Housing Program.



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

☐ Yes

☒ No



## EXHIBIT 2

# HOME Investment Partnership Program

## *Housing Rehabilitation Standards*

EFFECTIVE:

1/1/2014

City of Worcester

Executive Office of Economic Development





## **Introduction**

### **PURPOSE AND INTENT**

These general physical guidelines for the rehabilitation of existing residential properties have been developed to provide minimum design and construction criteria for the City's Housing Rehabilitation and Homeowner Improvement Program. These provisions are intended to serve as an aid in carrying out rehabilitation objectives and goals for neglected and run-down properties. The housing rehabilitation standards seek to address those physical, social, and economic factors which have tended to contribute to neighborhood deterioration.

The purpose and intent of the rehabilitation standards are three-fold:

1. To assure improved housing that is livable, healthful, safe, and physically sound, utilizing durable, cost effective materials and quality of workmanship to assure that as many residents requiring assistance are able to receive funding.
2. To provide a guide to an acceptable minimum level for residential rehabilitation with sufficient flexibility to meet varied local conditions.
3. To encourage innovation and improved technology for reducing construction and maintenance costs in order that safe and decent housing may be provided to as many City residents as possible.

### **MISSION AND HOUSING VALUES**

Our Program's mission is "to increase quality of life for Worcester residents through cost effective renovation providing all low income residents with safe, secure and affordable housing."

Values to be realized from the program mission are as follows:

- Hazard free homes at an affordable cost
- Code compliance for all eligible residential housing
- Cost, performance and durability of repairs/materials
- Quality of workmanship
- Historically sensitive exteriors
- Affordable operating costs



## **APPLICATION OF STANDARDS**

These minimum rehabilitation standards are incorporated as part of the City's Housing Rehabilitation and Homeowner Improvement Program policies and procedures. All rehabilitation performed to properties, under the program, shall comply with the existing standards set forth in all applicable statutes, codes, and ordinances relating to the use, maintenance and occupancy of property within the City, including but not limited to the City of Worcester building, plumbing, mechanical, electrical, fire, housing, and residential codes, and applicable HUD guidelines: as amended. These code standards are hereby incorporated by reference and made a part of these property rehabilitation standards. The following rehabilitation standards may be superseded in whole or in part by the above codes in instances where code requirements are more stringent.

## **DEVIATIONS FROM SPECIFIED WORK REQUIREMENTS**

Any and all replacement items shall be of similar size, quality, and shape unless noted otherwise specified. Medium grade and/or construction grade materials shall be utilized only. If the owner chooses an item which increases the cost due to but not limited to materials, quality, energy conservation, etc., the difference between the specified cost and the owner's request shall be borne by the owner, architect or other individual requesting more costly materials or processes. The Housing Rehabilitation and Homeowner Improvement Program will provide funds to perform activities and provide materials to achieve minimum compliance with aforementioned regulatory requirements. The maximum grant/loan amounts to be awarded to a particular unit/project will vary depending on funding availability and source. All substitutions or changes in materials must be submitted in writing and receive approval from the Program Manager.



## **RESIDENTIAL REHABILITATION PRIORITIES**

The following priority system will be used to classify rehabilitation work and descends in the order of importance:

### **Category A - Health & Safety items**

These consist of code violations that threaten the health and safety of residents (e.g., basic structural, mechanical, electrical, heating and/or plumbing systems). If there are insufficient dollar resources available from the Worcester Housing Rehabilitation and Homeowner Improvement Program and/or private sources to correct all code violations, those violations that pose the greatest threat to health and safety will be corrected. The Housing Rehabilitation and Homeowner Improvement Program's Housing Program Manager will determine which code violations are most serious.

### **Category B – Imminent Code Violations**

These items include those elements of the structure which are not in violation of the code but appear to be in a condition that will deteriorate into a code violation if left uncorrected (e.g., hot water heater or boiler of 30 or 40 years of age which may have given some minor problem in the recent past). If sufficient dollars are available to address more than the Category A items, then Category B improvements may be undertaken to the extent financial feasibility and practical as determined by the Housing Program.

### **Category C - Energy Conservation Items**

These items are directly related to the use of energy conservation through the upgrading when replacement is required. Allowable energy conservation upgrades may include double insulated vinyl replacement windows, storm doors, water saving fixtures, and insulation. These considerations may be undertaken provided funding also is addressing all concerns covered in Category A and B.

### **Category D - General Property Improvements (prohibited items)**

These work items constitute improvements for which grants and/or loans may not be used. Examples include landscaping, sump pumps, etc. Luxury items such as room additions, air conditioning, decks, etc. will not be considered. The Housing Program Manager, Lead/Rehab Specialist and Lead Program Manager will determine which items are to be considered property improvements and are therefore ineligible for program funding. "Improvements" are not permitted under the City of Worcester Housing Rehabilitation loan/grant programs.



## **RESIDENTIAL REHABILITATION STANDARDS**

### **Applicable Laws and Regulations**

The Worcester Housing Rehabilitation and Homeowner Improvement Program is intended to repair and maintain homes in full compliance with the following statutory and regulatory requirements:

- Building Code: The International Building Code 2008 Edition
- 780 CMR - Building Regulations and Standards, Massachusetts (Seventh Edition)
- Housing Code: The City of Worcester Housing Ordinances
- Federal Housing Code: Housing Quality Standards
- Life Safety Code: Life Safety Code of Standards, HUD, EPA
- Title X; Lead Hazard Reduction: Sections 1012, 1013.

The Worcester Housing Rehabilitation and Homeowner Improvement Program shall strive to conform to the following codes when providing financial assistance for compliance with the above code requirements:

- Energy: The International Energy Code 2008
- Accessibility: ANSI standards for handicapped accessibility (as applicable)
- HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing

### **Housing Rehabilitation Standards**

All dwelling units rehabilitated with funds provided through the Housing Rehabilitation and Homeowner Improvement Program shall be upon completion, is substantial compliance with the following:

- Department of Housing & Urban Development (HUD) Final Rule on Lead-Based Paint Poisoning.
- HUD, Housing Rehabilitation Division, Residential Rehabilitation Standards
- Massachusetts Building Code
- All applicable City of Worcester codes and ordinances

### **Illegal Construction**

Any building or part of a building for which there was no permit for construction or which is determined to be not in compliance with the City of Worcester Building Department and/or Zoning requirements shall be made to conform to the code to the extent that funds are available, if such non-permit construction is judged to be harmful to the health and safety of the occupants. The City of Worcester Housing Rehabilitation and Homeowner Improvement Program shall seek a decision from the appropriate city enforcement agencies in such cases.



### **Privacy and Arrangement**

A degree of privacy shall be provided commensurate with suitable living conditions by means of the proper location of exterior openings and by the interior arrangement of rooms. Access to all parts of a living unit shall be possible without passing through a public hall.



## **SITE IMPROVEMENTS**

### **Landscaping**

Repair Standard: Minimum Life: NA

Trees that are too close to the structure or threaten electric wiring shall be trimmed or removed.

Replacement Standard:

Landscaping is permitted at the front elevation to promote a welcome and established home with an allowance of up to \$1,000.

### **Outbuildings**

Repair Standard: Minimum Life: 1 year

Unsafe and blighted structures, including outbuildings, sheds, garages and barns, will be removed if it is not financially feasible to complete the repairs required to make them structurally sound and leak free with lead hazards stabilized.

Replacement Standard:

All historically significant outbuildings shall be restored.

### **Paving and Walks**

Repair Standard: Minimum Life: 5 years

Badly deteriorated, essential paving, such as front sidewalks, will be repaired to match. Non-essential deteriorated paving such as sidewalks that are unnecessary, will be removed and appropriately landscaped.

Replacement Standard:

Essential walks and drives shall be replaced with concrete.

### **Fencing**

Repair Standard: Minimum Life: 3 years

Fencing shall be removed if not required to limit access by children, pets or dangerous neighborhood conditions.

Replacement Standard: Minimum Life: 10 Years

Historically sensitive wood or wrought iron fencing.

### **Walkways**

Appropriate paved walks and exterior steps shall be provided. Walkways shall be of a safe level surface. Serious defects shall be repaired or replaced.

### **Water Diversion**

The open space of each property shall provide, or shall have provided for the immediate diversion of water away from the buildings and the prevention of soil saturation detrimental to structures and use of the property. Installation of French drains or grading.

Replacement Standard: Minimum Life: 20 Years



## **EXTERIOR SURFACES**

### **Painting and/or Exterior Finishing**

Exterior surfaces of structures shall be painted and/or waterproofed as required by type and location of existing surface. Repairs or replacements shall be made to defective exterior wall finished materials. Exterior walls should be free of holes, cracks, and broken or rotted finished materials. A protective and decorative finished coating or surfacing shall be required to provide adequate resistance to weathering, protection of finished surfaces from moisture or corrosion, and attractive appearance and reasonable durability.

Replacement Standard: determined on a case by case basis.

### **Screens**

Half screens shall be provided for all operable windows. Existing screens, which are to be continued in use, shall be in suitable condition to serve their intended purpose. Combination storm and screen windows and doors shall be furnished where economically feasible.

Replacement Standard: determined on a case-by-case basis.

### **Stairs, Exterior**

Installation of exterior stairways must conform to the design requirements of the National Property Maintenance Code as amended as to width, handrails, tread and riser dimensions, etc.

Replacement Standard: Replacement Standard: Minimum Life: 20 Years

### **Exterior Accessory Structures**

All exterior appurtenances or accessory structures, in a deteriorated code violation condition, may be repaired to a safe condition to the extent that funds are available or shall be removed. Such structures include existing porches, entrance platforms, garages, carports, fences, and storage sheds.

Replacement Standard: determined on a case-by-case basis.

### **Exterior Doors**

Exterior doors shall be furnished with operable keys. All exterior doors and hardware shall be maintained in good condition. All locks shall tightly secure the door.

Repair Standard: Minimum Life: 10 Years

Doors shall be solid, weather striped, operate smoothly, including a peep site, a dead bolt, and an entrance lock set.

Replacement Standard: Minimum Life: 10 Years

All replacement doors at the front of the property will be historically sensitive where applicable. Steel fan lite security doors will be installed at front entrances. Steel six panel security doors will be installed at entrances not visible from the front street. Lock sets and dead bolts will be installed on all doors.



## **Exterior Walls**

Foundations and exterior walls shall provide safe and adequate support for all loads upon them, and prevent the entrance of water or excessive moisture. Serious defects shall be repaired and effectively sealed.

Replacement Standard: determined on a case-by-case basis.

## **Flashing**

To prevent the entrance of water, all critical joints and exterior and roof and wall construction which are exposed, shall be protected by sheet metal or other suitable flashing material.

Replacement Standard: Minimum Life: 15 Years

## **Exterior Lead Hazards**

Interim Control Standard: All exterior paint shall be stabilized.

Abatement Standard: If the exterior surface contains lead, components shall be replaced or the paint removed or covered to create a lead-safe exterior.

Replacement Standard: Replacement or covering; Minimum Life: 15 Years

Replacement Standard: Painting; To be determined on a case-by-case basis.

## **Exterior Steps And Decks**

Repair Standard: Minimum Life: 5 years

Steps, stairways, and porch decks will be structurally sound, reasonably level, with smooth and even surfaces.

Replacements Standard: Minimum Life: 20 years

New steps and stairways shall be constructed of preservative treated lumber in conformance with the International Building code. Porch decks shall be replaced with a historically appropriate tongue and groove pine.

## **Exterior Railings**

Repair Standard: Minimum Life: 5 Years

Handrails will be present on one side of all interior and exterior steps or stairways with more than two risers, and around porches or platforms over 30" above ground level. Railing repairs will be historically sensitive.

Replacement Standard: Minimum Life: 10 Years

Railings shall be wrought iron or preservative treated lumber.

## **Exterior Cladding**

Repair Standard: Minimum Life: 10 Years

Siding and trim will be intact and weatherproof. All exterior wood components will have a minimum of two continuous coats of paint, and no exterior painted surface will have any deteriorated paint.

Replacement Standard: Minimum Life: 20 Years

Historically sensitive wood clapboard must be over protective house-wrap.



## **Exterior Porches**

Repair Standard: Minimum Life: 10 Years

Unsafe or unsightly porches will be repaired to conform closely to historically accurate porches in the neighborhood.

Porch repairs will be structurally sound, with smooth and even decking surfaces.

Replacement Standard: Minimum Life: 10 Years

Deteriorated porches shall be rebuilt with preservative treated structural lumber and tongue and groove pine decks.

## **Exterior Hardware**

Repair Standard: NA

Replacement Standard: Minimum Life: 10 Years

Every dwelling unit will have a mailbox, or mail slot, and minimum 3" high address numbers at the front door.



## **FOUNDATIONS AND STRUCTURE**

### **Structural Soundness**

All structural components of the building shall be rehabilitated to a sound and serviceable condition for the expected useful life of the building. Sagging or out of level floors, partitions, stairs, wall, etc., are to be supported and/or braced or rebuilt so as to prevent a recurrence of these conditions. Individual structural members, in a seriously deteriorated condition, shall be replaced.

### **Basements, Cellars**

The floors of all basement or cellar furnace rooms, or basements shall be covered with a concrete slab with a minimum 3.5 inch thickness. Habitable rooms in basements or below grade, intended for occupancy, shall comply with all Worcester codes and zoning regulations.

### **Basement and Foundation Walls**

All foundation walls shall be able to carry the safe design and operating dead and live loads. Basement and foundation walls shall prevent the entrance of water or moisture into a basement or crawl space area. Cracks in the walls shall be effectively sealed and loose or defective mortar joints replaced. Where necessary, interior or exterior face of the wall shall be damp proofed by bituminous coating or cement parging.

Repair Standard: Minimum Life: 20± Years

### **Foundations**

Repair Standard: Minimum Life: 20± Years

Foundations will be sound, reasonably level, and free from movement.

Replacement Standard: NA

### **Structural Walls**

Repair Standard: Minimum Life: 15 Years

Structural framing and masonry shall be free from visible deterioration, rot, or serious termite damage and be adequately sized for current loads. Prior to rehab, all sagging floor joists or rafters will be visually inspected, and significant structural damage and its cause will be corrected.

Replacement Standard: NA

### **Firewalls**

Repair Standard: Minimum Life: 5 Years

Party walls shall be maintained without cracks and plaster deterioration and covered with 2 layers of 5/8" type X gypsum, glued and screwed to studs.

Replacement Standard Minimum Life: 10 Years

When frame walls and floors adjoining other dwellings are gutted, new wall finish installations will conform to local requirements for fire ratings.



### **Partitions, Columns, and Posts**

Partitions, columns and posts, and other vertical supports which are to be continued in use shall be free of excessive leaning, buckling, or other defects. All structural members shall be maintained free from deterioration and shall be capable of safely supporting the imposed dead and live loads.

Replacement Standard: Minimum Life: 15 Years



## **WINDOWS AND DOORS**

### **Window-Doors/Replacement**

Existing windows and doors, including their hardware, shall operate satisfactorily and give evidence of continuing acceptable service. Defective glass blocking or lifting hardware shall be replaced or corrected. At a minimum, the bottom half of all double hung windows shall operate satisfactorily. The following guide shall be used to determine the need for repair or replacing window sash, doors, and/or frames:

Repair if work can be done in place.

Replace if entire component needs to be removed in order to restore.

Refinish if only the surface needs work in order to restore same to new condition.

Replacement Standard: Minimum Life: 15 Years

### **Exterior Doors**

Repair Standard: Minimum Life: 10 Years

Doors shall be solid, weather striped, operate smoothly, including a peep site, a dead bolt, and an entrance lock set.

Replacement Standard: Minimum Life: 10 Years

All replacement doors at the front of the property will be historically sensitive where applicable.

Steel fan lite security doors will be installed at front entrances. Steel six panel security doors will be installed at entrances not visible from the front street. Lock sets and dead bolts will be installed on all doors.

### **Windows**

Repair Standard: Minimum Life: 15 Years

All single glazed windows shall be covered by a storm sash in which the meeting rail matches up with the prime window. Operable windows shall have a locking device and mechanism to remain partially open.

Replacement Standard (when permitted): All lead-containing windows shall be replaced with Vinyl, double glazed, double hung, low E, one over one with half locking screen/or to match the style of the window being replaced.

Double-glazed, double or single hung. PVC, low E, one over one, with historically sensitive snap-in grids and a minimum R value 2.

### **Interior Doors/Placement**

Repair Standard: Minimum Life: 10 Years

All bedrooms, baths and closets shall have well operating doors.

Replacement Standard: Minimum Life: 10 Years

Hollow core, pressed wood product with brass plated bedroom lockset.



## **ROOFING**

### **Roofing**

Roof covering shall be capable of resisting fire appropriate to the type of construction and location, and new installation shall be accordance with nationally accepted standards. All roofs shall have a suitable water-tight and reasonably durable covering free of holes, cracks, excessively torn surfaces or other defects. The placing of new covering over an existing covering shall not take place if two or more layers exist. Replacement roof materials shall be consistent with current technology. Wood shakes, shingles, and clay tile roofs shall not be replaced.

Replacement Standard: Minimum Life: 20 Years

### **Gutters (only where existing or required)**

Each dwelling having a controlled method of disposal of water from roofs, where necessary, to prevent damage to the property and to avoid unsightly staining of walls, etc. shall have all system components operating and free from debris or defect.

Repair Standard: Minimum Life: 5 Years

Replacement Standard: Minimum Life: 15 Years

### **Pitched Roofs**

Repair Standard: Minimum Life: 15 Years

Missing and leaking shingles and flashing shall be repaired on otherwise functional roofs. Slate roofs shall be repaired when at all possible. Antennae shall be removed.

Replacement Standard: Minimum Life: 20 Years

Fiberglass asphalt, 3 tab, Class A shingles weighing at least 200 and up to 240 lbs. with a prorated 20-year warranty with continuous ridge vent.

### **Flat And Low Slope Roofing**

Repair Standard: Minimum Life: 10 Years

Built-up roofing, flashing and accessories shall be repaired wherever a 5-year, leak-free warranty is available from a certified roofing company.

Replacement Standard: Minimum Life: 20 Years

Fully adhered EPDM over 1/2" insulation board.



## **INSULATION AND VENTILATION**

### **Insulation**

Insulation shall be installed where possible in any new walls, attics, crawl spaces when other work is performed. Weather stripping and/or weather-proof thresholds shall be installed around all doors. Insulation and weather-stripping shall comply with the Department of Energy and Housing and Urban Development's Initiative of Energy Efficiency on Housing.

Repair Standard: NA

Replacement Standard: Minimum Life: 15 Years

Attic areas and crawl space will be insulated. The goal for attic insulation is R32, and for crawl spaces R 19. Frame walls will be insulated whenever the wall finish is removed. 6 mil plastic vapor barriers will be placed over bare soil in crawl spaces.

### **Attic Ventilation**

Repair Standard: NA

Replacement Standard: Minimum life: 20 Years

Attics will be ventilated with a minimum of 1 square foot of free vent for each 300 square feet of roof area.

### **Kitchen Ventilation**

Repair Standard: NA

Replacement Standard: Minimum Life: 5 Years

Range hoods or exhaust fans shall be exterior ducted with less than 20 sones and at least 120 CFM.

### **Bath Ventilation**

Repair Standard: NA

Replacement Standard: Minimum Life: 5 Years

Exterior ducted 70 CFM. 20 sones with separate switch in all full baths.



## **INTERIOR STANDARDS**

### **Interior Stairs**

All stairways shall provide safety of ascent, and stairs and landing shall be arranged to permit adequate headroom and space for the passage of furniture and equipment. All living units shall have access to an approved exit. All exit stairways shall be protected at the sides by acceptable railings as per dwelling code requirements

### **Interior Doors**

Provide door for each opening to bedroom, bath, or toilet compartment. Bath or toilet compartment doors are to be furnished with privacy-type locks.

Replacement Standard: Minimum Life: 15 Years

### **Interior Finishing**

Where painted surfaces are in good condition or show evidence that maintenance has taken place, painting shall not be required. In all cases, it is urged that the homeowner take upon himself the accomplishment of this normal maintenance item. All interior walls and ceilings shall provide a finished surface without noticeable irregularities or cracking, a waterproof and hard surface and spaces not subject to moisture, a suitable base for painting or other decoration and reasonable durability and economy of maintenance.

Replacement Standard: Minimum Life: 5 Years

### **Kitchen Space**

Each living unit shall have a specific kitchen space which contains sink with counter work space, and has hot and cold running water, adequate space for installing cooking and refrigeration equipment, and for storing cooking utensils.

### **Light and Ventilation**

All habitable rooms shall be provided with aggregate glazing area of not less than eight percent of the floor area of such rooms. One-half of this required area of glazing shall be openable. The glazed area may be omitted in rooms where an approved mechanical ventilation system is provided capable of producing .35 air changes per hour. Bathrooms, water closed compartments, and other similar rooms shall be provided with approved glazing, except in the case of artificial light and ventilation as stated above.

### **Attic and Crawl Spaces**

Access to attics shall be provided by means of conveniently located scuttles or disappearing or permanently installed stairways. For crawl space, the minimum access opening shall be 18 inches by 24 inches. For attics, the minimum access opening shall be not less than 22 inches by 30 inches with a clear height of over 30 inches. However, if either are to contain mechanical equipment, the access opening shall be of sufficient size to permit the removal and replacement of the equipment, and shall have a means of access provided, i.e., ladder or steps.



## **Ceiling Heights**

All habitable rooms, hallways, and corridors shall have a ceiling height of not less than seven feet measured to the lowest projection of the ceiling. Variations to these areas and dimensions may be permitted when existing partitions preclude compliance, and the available area or dimensions do not hinder the normal use of the space.

## **Lead-Containing Components**

Interim Control Standard: Lead-containing walls, trim, doors and cabinets that can be replaced for an additional cost of 15% over the expected repair cost shall be replaced or enclosed with gypsum. All other components shall be stabilized.

Abatement Standard: The property may be made free of lead hazards to comply with all applicable Massachusetts and federal regulations.

Repair Standard: To be determined on a case-by-case basis

## **Flooring**

All floor construction shall provide safe and adequate support for all existing or probable loads and shall be reasonably free of vibration. A suitable surface for finished flooring shall exist or be provided. Finished floors shall be appropriate to the use of space, be in good condition, provide reasonable ease of maintenance, and extended service life. Finished floors in habitable rooms shall be wood flooring, a resilient tile, or sheet material or carpeting over suitable underlayment. Floors, in kitchens and bathrooms, shall be of durable waterproof, non-absorbent material over a suitable underlayment.

Repair Standard: Minimum Life: 3 Years

Bathroom and kitchen floors shall be covered with water resistant vinyl flooring. Damaged wood floors will be repaired.

Basement floors shall be continuous concrete.

Replacement Standard: Minimum Life: 6 Years

Baths shall receive vinyl sheet goods over plywood underlayment. Kitchens shall be vinyl composition tile over plywood underlayment. New basement slabs shall be at least 3" thick and a 6 mil vapor barrier.

## **Closets**

Repair Standard: Minimum Life: 5 Years

All bedrooms shall have closets with a door, clothes rod, and shelf.

Replacement Standard: Minimum Life: 15 Years

All bedrooms shall have 4' long by 2' wide closets with bifold door and wire shelf.

## **Interior Walls And Ceilings**

Repair Standard: Minimum Life: 5 Years

All holes and cracks shall be repaired to create a continuous surface with no deteriorated paint surfaces.

Replacement Standard: Minimum Life: 10 Years



Walls shall be plumb, ceiling level with a smooth finish on at least 1/2" gypsum.

### **Hazmat**

Repair Standard: Minimum Life: NA

Asbestos and lead paint hazards, when identified, shall be addressed in conformance with applicable local, state, and federal laws. All rehabilitated properties shall be cleaned to pass a Lead Dust clearance test to the levels prescribed by HUD regulations.

### **Vermin Infestation**

A careful inspection shall be made of each building and/or accessory structure to be rehabilitated for evidence of actual or potential infestation. Defects, permitting the entrance of vermin, will be addressed with preventive measures. Where conditions warrant, corrective actions of a professional exterminator is an allowable expense.

### **Kitchen Equipment**

Adequate lower counter and upper cabinet space is required.

Appliances are permitted improvements.

Each dwelling unit must have an operating stove and refrigerator.

### **Bath Facilities**

Complete bathing and sanitary facilities shall be provided within each living unit. They shall consist of a water closet, a tub or shower, and a lavatory and provide an adequate supply of hot water to the tub or shower stall and lavatory and cold water to all fixtures. Arrangement of fixtures shall provide for the comfortable use of each fixture. Each installation in a living unit shall be installed in a manner as to afford privacy to the occupant. A bathroom shall not be used as a passageway to/or a habitable room, or exit to the exterior. Each building and living unit, within the building, shall have domestic hot water in quantities sufficient for needs of the occupants. Existing water heaters shall be in good serviceable condition. The minimum storage capacity shall be 30 gallons or the equipment shall be replaced. No water heater shall be installed in any room used or designed for sleeping purposes. No water heater shall be located in a bathroom, clothes closet, under any stairway, or in a confined space with access only to the above locations. All fuel burning water heaters shall be connected to a vent leading to the exterior. All pumps and disposal systems shall operate as designed or the equipment shall be repaired or replaced. The plumbing system and its appurtenances shall provide satisfactory water supply, drainage, venting, and operation of all fixtures. Plumbing systems, including sewers, shall operate free of fouling and clogging, and not have cross connection which permit contamination of water supply or back siphonage between fixtures.

### **Mold/Mildew**

Erect containment barrier using poly sheeting and isolate the work area – set up air lock for entry (similar to asbestos or lead work) workers must wear protective equipment; N-95 respirator, gloves and disposable coveralls, etc.



Establish negative pressure using HEPA air filtration equipment. (if required to prevent migration of mold spores during remediation activities)

Remove damaged affected components - (contain in sealed poly bags or sealed containers for disposal) Remove all contaminated materials if porous.

Wipe clean outer surfaces of the disposal vessels.

Remove all debris from the building.

Do not temporarily store debris within the building.

Install new wallboard, components, insulation, and/or perform other activities required to complete the work.

### **Non-Living Space Ventilation**

Natural ventilation of spaces such as attics and enclosed crawl spaces shall be provided by opening of sufficient size to overcome dampness and minimize the effect of conditions conducive to decay and deterioration of the structure, and to prevent excessive heat in attics. Exterior ventilation openings shall be effectively screened where needed.



## **ELECTRICAL**

### **Electric Wiring**

All habitable rooms and other appropriate spaces requiring electrical service shall be provided with a system of wiring, wiring devices, and equipment to safely supply electrical energy to proper illumination, appliances, and other electrical equipment. Existing wiring and electrical equipment shall not be a potential source of electrical hazard or ignition of combustible materials, and shall be so determined by the proper authority. Wherever these potential hazards are determined to be present, replacement of existing wiring and/or equipment shall be made. Every dwelling unit shall be served by a main service that is not less than 60 amperes/three wires. Existing facilities that are dangerously overloaded and inadequate to meet the anticipated demand shall be increased. For new electrical work, the appropriate provisions of the National Electrical Code shall be used as a guide for design layout and installation.

Repair Standard: Minimum Life: 10 Years

Replacement Standard: Minimum Life: 15 Years

### **Electric Service**

Repair Standard: Minimum Life: 10 Years

Main distribution panels shall have a main disconnect, at least 7 circuits, a 100 amp minimum capacity and be adequate to safely supply power to all existing and proposed electrical devices.

Replacement Standard: Minimum Life: 15 Years

150 amps, main disconnect panel with at least 16 circuit breaker positions.

### **Exterior Electric**

Replacement Standard: NA

All entrances will be well lighted and either switched at the interior side of the door, or the light will be controlled by a photoelectric cell. Motion actuated security lighting will be installed at the rear and sides of properties where it will increase safety. All dwelling units will have at least one exterior, GFCI protected, electrical receptacle.

### **Interior Electric Distribution**

Repair Standard: Minimum Life: 7 Years

Exposed knob and tube shall be replaced. Every room will have a minimum of two duplex receptacles, placed on separate walls and one light fixture or receptacle switched at each room entrance. Where the source wiring circuit is accessible (i.e. first floor above basements, in gutted rooms, etc.), receptacles will be grounded. All switch, receptacle and junction boxes shall have appropriate cover plates. Wiring shall be free from hazard and all circuits shall be properly protected at the panel. Floor receptacles shall be removed and a metal cover plate installed.

Replacement Standard: Minimum Life: 15 Years

Ground Fault Circuits

Repair Standard: NA Minimum Life: 5 Years

Replacement Standard:

Basement and kitchen receptacles within 6 feet of a sink must be GFCI protected.



All bath receptacles must be GFCI protected.  
All exterior receptacles must be GFCI protected.

### **Kitchen Electric Distribution**

Repair Standard: Minimum Life: 7 years

Replacement Standard:

Permanently installed stoves, refrigerators, freezers, dishwashers and disposals, washers and dryers shall have separate circuits sized to NEC. Two separate 20 amp counter circuits are required with each kitchen area.

### **Stairwell Lighting**

Repair Standard: NA Minimum Life: 7 Years

Replacement Standard:

All common halls and stairways between living space must be well lighted with a fixture controlled by 3 way switches at both ends of the hall or stairway.

### **Alarms**

Repair Standard: NA Minimum Life: NA

Replacement Standard: Minimum Life: 5 Years

Directly wired fire and smoke detectors shall be installed on all sleeping floors.

CO detectors shall be installed as per Massachusetts Building Code.



## **PLUMBING SYSTEM**

### **Water Supply**

Repair Standard: Minimum Life: 5 Years

Replacement Standard: Minimum Life: 20 Years

All inoperable or leaky main shut off valves shall be replaced. Lead pipe and exposed galvanized pipe shall be replaced with copper pipe.

### **Drain, Waste, Vent Lines**

Repair Standard: Minimum Life: 15 Years

Waste and vent lines must function without losing the trap seal.

Replacement Standard: Minimum Life: 20 Years

PVC replacement lines shall be installed in accordance with the most recently approved version of the mechanical code.

### **Plumbing Minimum Equipment**

Repair Standard: Minimum Life: 7 Years

Every dwelling unit shall have a minimum of one single bowl sink with hot and cold running water in the kitchen and at least one bathroom containing a vanity with a sink, and a shower/tub unit, both with hot and cold running water, and a toilet. Washer/dryer hookups are not required.

### **Plumbing Fixtures**

Repair Standard: Minimum Life: 7 Years

All fixtures and faucets shall have all working components replaced.

Replacement Standard: Minimum Life: 20 Years

Single lever, metal faucets and shower diverters with 15-year drip-free warranty. Ceramic toilets, double bowl stainless steel sinks, fiberglass tub surrounds and/or steel enameled 5' tubs.

### **Water Heaters**

Repair Standard: Minimum Life: 5 Years

Each dwelling unit shall have a gas fired water heater. The minimum capacity for units with two bedrooms or less shall be 30 gallons, larger units shall have a minimum capacity of 40 gallons.

Insulation jackets shall be present unless the installation poses a safety concern. Water heaters shall have pressure relief valves with drip legs that extend to within one foot of the floor. Expansion tanks will be included with the installation of new water heaters.

Replacement Standard: Minimum Life: 6 Years

High efficiency, pilotless, gas fired water heaters with at least R-7 insulation and a 6-year replacement warranty.



## **HVAC**

### **Heating And Ventilation**

All heating and ventilating equipment and systems shall be installed so that maintenance and replacement can be performed. Existing mechanical equipment and systems shall be inspected for faulty operation, fire and/or other hazards. Heating facilities shall be provided for each living unit and other spaces that will assure interior comfort, be safe and convenient to operate, be economical in performance and be quiet in operation. Forced air heating systems shall not supply more than one dwelling unit. Each heating system or device shall have a recognized approval for safety and shall be capable of maintaining a performance and be quiet in operation. Each heating system or device shall have a recognized approval for safety and shall be capable of maintaining a temperature of at least 68 degrees Fahrenheit within the living units, corridors, public spaces, and utility spaces where the outside temperature is at zero degrees. No open flame, radiant type space or floor heaters shall be permitted. Appropriate clearances around all heating equipment shall be provided and walls and ceilings protected in an acceptable manner.

Repair Standard: Minimum Life: 10 Years

### **Heating**

Repair Standard: Minimum Life: 10 Years

Inoperative, hazardous or inefficient (less than 60% AFUE) heating plants shall be repaired and altered to perform at least at 75% efficiency. Setback thermostats are required.

Replacement Standard: Minimum Life: 20 Years

New Gas and oil fired systems shall be rated at 85% AFUE or better. Heat pumps shall be rated at 13 SEER or better. Setback thermostats are required on fuel burning appliances.

### **Heating/Cooling Distribution System**

Repair Standard: Minimum Life: 10 Years

Duct work and radiator piping shall be well supported, insulated in unconditioned space and adequate to maintain 68°F measured 36" off the floor when the outside temperature is -5°F, (the average yearly minimum) in all habitable and essential rooms.

Replacement Standard: Minimum Life: 20 Years

All ductwork shall be insulated to R-4, seams sealed and run in concealed space.

### **Chimneys, Vents**

Chimneys and vents shall be structurally safe, durable, smoke tight, and capable of withstanding the action of flue gasses. Existing unlined masonry chimneys, having open mortar joints or cracks, shall be made safe by the installation of a flue liner or corrosion resistant pipe within the interior of the chimney.

Repair Standard: Minimum Life: 15 Years



## **Chimney Repair**

Repair Standard: Minimum Life: 15 Years

Unsound chimneys shall be repaired or removed. When chimneys are to be used to combustion ventilation, they shall be relined.

Replacement Standard: Minimum Life: 20 Years

Fireplace flues that are operable may be reconstructed in this program. Replacement furnace flues shall be metal double or triple walled recommended by the furnace manufacturer.

## **Air Conditioning**

Air conditioning is beyond the scope of this program except in cases of documented medical need for cooling and/or preventative filtration.

Repair Standard: Minimum Life: 3 Years



## **MATERIALS, METHODS and FINISHES for LEAD ABATEMENT**

Unless otherwise specified in the Project Specifications, the following materials and methods are to be utilized on all WLAP projects.

Exact quantities and measurements of materials and components are the responsibility of the contractor. The City of Worcester requires a building permit for work that will be performed under this contract at the Contractor's expense.

### **GENERAL**

All pre-primed and finger-jointed materials are prohibited.

### **REQUIRED METHODS INCLUDE**

1. REPLACE shall mean removal and legal disposal of original component
2. MAKE INTACT: scrape loose paint, spot prime. Paint to match on exterior surfaces
3. PAINT READY: fill holes, caulk and sand smooth
4. SCRAPE: all interior vertical surfaces to be scraped full height to header, exterior components scraped to 5' and feather sanded
5. SCRAPE OUTSIDE CORNER- Scrape to 5', compound or fill with sheetrock as needed, sand and prime to paint ready condition
6. CHAULKING- all covered lead components must be caulked
7. REPLACEMENT WINDOWS-Weights to be removed, cavities filled with insulation, exterior to be caulked
8. REMOVAL OF STORM WINDOWS-remove all caulking residue and fill holes
9. INSTALLATION OF INTERIOR STORMS OR PLEXIGLASS- Clean and caulk existing window prior to installation

### **DEMOLITION AND CLEANING**

All demolition materials and debris shall be removed from the site prior to inspection. Work site must be kept in a neat and orderly fashion throughout the project. All areas shall be HEPA vacuumed and cleaned with TSP solution prior to dust wipe testing.

### **DOORS**

1. Exterior Entry Doors: "Thermatru Smoothstar" or "Stanley" fiberglass foam filled door. Nine lite or solid six panel as specified. Exterior doors should be double bored unless otherwise specified.
2. Garage Doors: Clopay "Value Plus" or approved equal substitution
3. Interior Doors: Replace with similar type and style (solid doors, panel style, etc.) No hollow core doors allowed. See "Hardware" for lockset type

### **HARDWARE**

1. Exterior doors to have Schlage keyed passage and deadbolt. Doors to be keyed alike.
2. Bedrooms and bathrooms are to have Schlage privacy passage sets.



3. Exterior Closets/Storage areas are to have Schlage keyed passage sets.
4. Hardware finish- Will be specified are Brass, Antique Brass, Satin nickel or Bronze

## **EXTERIOR WORK**

### **VINYL SIDING/ALUMINUM TRIM**

1. Prepare walls by nailing all loose siding and shim or fur out excessive recesses.
2. Install CertainTeed Main Street or approved equal (.42") vinyl siding to all exterior walls, including porches
3. Solid or preformatted vinyl soffit (.38") panels under eaves with each fourth one aerated.
4. Provide and install formed aluminum to all window sills and fascia. All windows are to have aluminum trim coil stock applied, CertainTeed or equal.

### **WINDOWS**

1. All replacement windows to have a U factor of .30 or lower. Approved vendors: Harvey Classic, Norandex Viewpoint 6000 Series or MI 1555 series vinyl replacement windows. All to have half screens. Grids will be specified in scope.
2. Provide new window stops unless otherwise specified. Exclude attic windows unless specified.
3. Remove and dispose of cited existing windows and combination storm windows including parting beads, pulleys and weights.
4. Fill all weight pockets with fiberglass or spray insulation
5. Apply exterior caulking around perimeter of window where the replacement window abuts the exterior stops and sill to prevent moisture infiltration.
6. Cellar Windows: Remove all specified existing cellar windows and frames. Reframe openings with new 2"x 8" Pressure Treated pine. Furnish and install awning or slider windows and screens. Caulk all joints to create an air tight fit.

### **EXTERIOR TRIM, STAIRS, PORCHES AND DECKS**

1. Threshold: scrape to bare wood, replaced if rotted.
2. Porch and stairwell walls that are scraped or made intact will be spot primed to match (Exterior grade primer as needed)
3. Porch and stairwell floors that are scraped or made intact will be finish painted.
4. Positive exterior porch rails will be replaced with similar materials. All new installations must meet building code requirements.
5. Porch columns: Positive porch columns will be scraped and feathered to a height of 5 ft. All painted surfaces will be made intact.
6. Porch/stairwell corners to be covered with 4 1/4" pine header stock
7. Porch stairwell corners to be covered with 3/8" beadboard plywood
8. Exterior stairs, decks and porches will be replaced with pressure treated wood.

### **EXTERIOR FINISH AND PAINTING**

1. All covered lead components must be caulked.



2. All exterior trim must be finish painted. Apply one coat primer and 2 coats Sherwin Williams/Benjamin Moore exterior paint. Color and finish to be selected by owner.
3. Exterior siding may be spot painted to match existing.
4. Foundation painting: masonry paint
5. Exterior Stairs: Steps and landings, unless pressure treated, will be painted with exterior paint.

## **INTERIOR WORK**

### **FINISH**

1. All replacement trim to be paint ready. Sand and fill all holes.
2. Treated components must be sanded smooth. Surfaces that are “rough to the touch” will not be accepted.
3. All covered lead components must be caulked.

### **REPLACEMENT DOORS**

All positive interior doors shall be replaced with similar solid core doors.

### **DOOR JAMBS**

Positive door jambs will be wet scraped to bare wood to full height. All impact surfaces shall be scraped to bare wood.

### **DOOR CASINGS**

Positive vertical door casings will be replaced with materials of similar style, width and thickness to cover previous installation with no gaps, or contractor will be responsible to repaint interior at no additional charge. Headers and rosettes shall be made intact, or rosettes may be retained and headers may be replaced to match.

### **MOUTHABLE SURFACES**

All other positive mouthable surfaces on walls and other areas shall be replaced with similar materials, wet scraped or covered with approved material to full height. Outside corners on walls.

### **BASEBOARDS**

Install ¼ round molding to any positive baseboard where required. Wet scrape and feather outside corners of baseboard 4” from edge. Make remainder of baseboard intact.

### **LOOSE SURFACES**

All loose and peeling surfaces that have been identified as lead positive will be made intact and primed to match as closely as possible. Treated walls to be paint ready.



## **INTERIOR WALL AND CEILING FINISH**

Sheetrock 1/2" (unless needed for firewall) and tape seams and paint ready

## **THRESHOLDS**

Scrape to base wood.

## **FLOORS**

1. Vinyl Flooring: new "VCT" 1/8" gauge
2. Sheet Vinyl: 10 year minimum residential warranty
3. All new vinyl flooring shall be property glued to the underlayment, and all metal or other trim strips to complete the installation must be installed.
4. Interior Carpet: Provide and Install new 22 oz., 4 yr. limited warranty carpeting with pad (minimum 1/2"). All underlayment must be flash patched to a smooth surface prior to installing the carpet. Install all tack strips, brass metal edging, and seam tape necessary to complete the project.
5. Indoor/Outdoor Carpeting- 15oz minimum, 10 year warranty

## **STAIRS**

1. Replace stair treads with new materials of like thickness, size and type. Any wood exposed to the weather will be exterior grade.
2. Replace baluster, newels posts and handrail sections with new materials to match the existing finish to match.

## **CABINETS**

1. Kitchen: Install new cabinets, Replacement minimum of what existed, up to a \$3500 allowance.

## **BATHFANS**

1. Panasonic or NuTone Energy Star rated models. Must be vented to exterior.

## **CLEANING**

1. Upon daily completion of work, clean up all rubbish, excess material, equipment, and all substrates connected with the work, and leave work areas in a neat, sanitary, lead safe and presentable condition.
2. Cover all remaining furniture/items left in the unit with 6mil poly and securely tape all openings to prevent dust penetration
3. HEPA Vacuum and clean all units and common areas with TSP solution or equivalent.



## **NOTE**

The Contractor is responsible to make all components identified in the Lead Inspection Report to meet standards necessary at minimum to meet HUD and Massachusetts Lead Based Paint Abatement Requirements. The specifications provided should only be used for the identified component. The specification in no way should be relied upon as a complete list of necessary tasks to complete project.



## Note 13 Sole Source Aquifers

For compliance the following checklist has been completed for all Affordable Housing activities as described above at the program level.

### Sole Source Aquifers (CEST and EA)

**1. Is the project located on a sole source aquifer (SSA)<sup>10</sup>?**

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

☐ Yes → *Continue to Question 2.*

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

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

☐ No → *Continue to Question 3.*

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

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

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

☐ No → *Continue to Question 5.*

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

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

☐ No → *Continue to Question 5.*

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

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<sup>10</sup> A sole source aquifer is defined as an aquifer that supplies at least 50 percent of the drinking water consumed in the area overlying the aquifer. This includes streamflow source areas, which are upstream areas of losing streams that flow into the recharge area.



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

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

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

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

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

### **Worksheet Summary**

#### **Compliance Determination**

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

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

A map is attached showing the City of Worcester does not contain and is not near a sole source aquifer system.



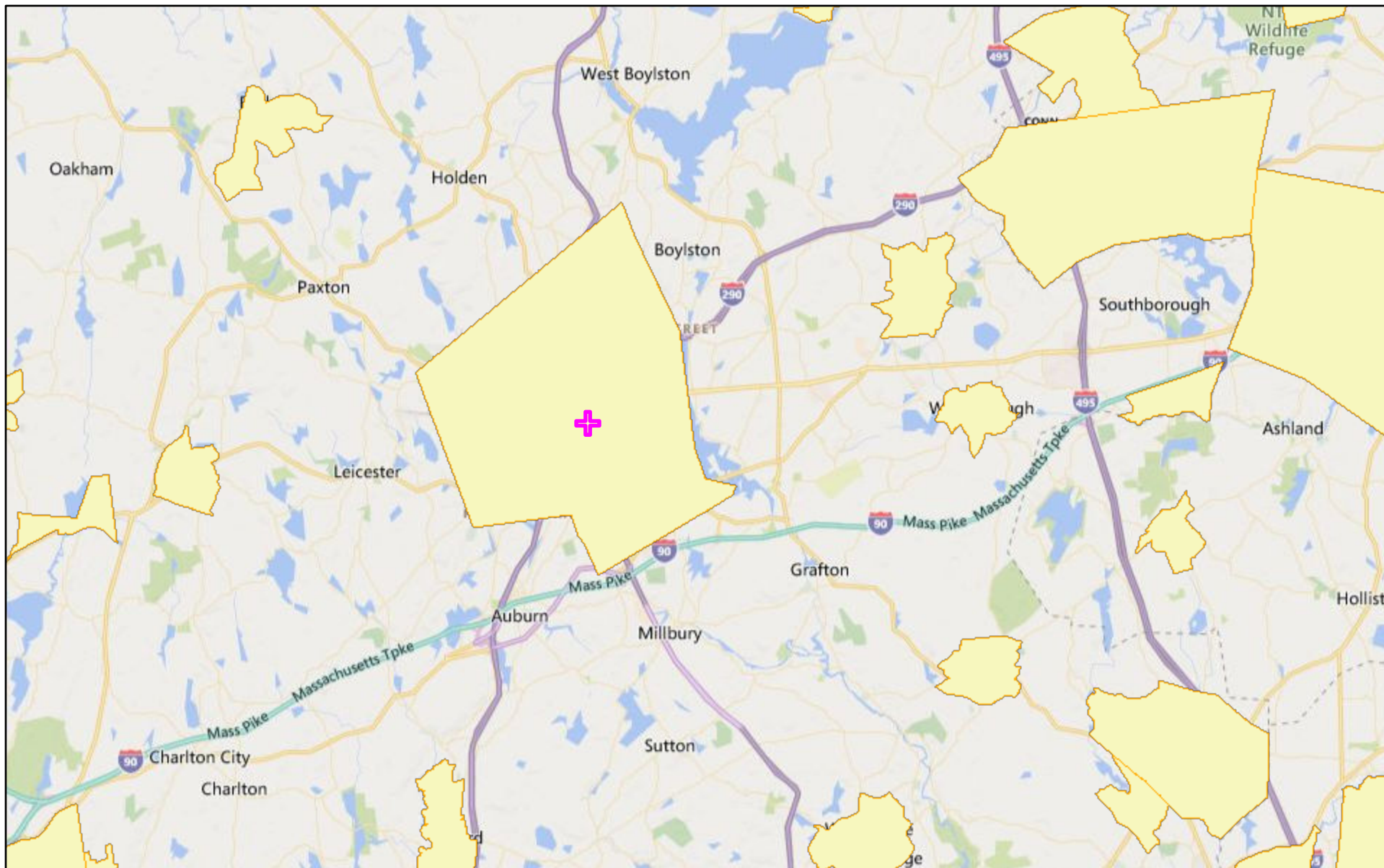
**Are formal compliance steps or mitigation required?**

☐ Yes




☒ No



## NOTE 13 Sole Source Aquifers



June 15, 2020

-  Search Result (point)
-  City Boundary
-  Sole Source Aquifers

1:288,895

0 1.75 3.5 7 mi

0 2.75 5.5 11 km

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## Note 14 Wetlands

For compliance, the following checklist will be completed at the project level.

### Wetlands (CEST and EA)

1. Does this project involve new construction as defined in Executive Order 11990, expansion of a building's footprint, or ground disturbance?

The term "new construction" shall include draining, dredging, channelizing, filling, diking, impounding, and related activities and any structures or facilities begun or authorized after the effective date of the Order.

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

☐ Yes → *Continue to Question 2.*

2. Will the new construction or other ground disturbance impact an on- or off-site wetland?

The term "wetlands" means those areas that are inundated by surface or ground water with a frequency sufficient to support, and under normal circumstances does or would support, a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bogs, and similar areas such as sloughs, potholes, wet meadows, river overflows, mud flats, and natural ponds. Wetlands under E.O. 11990 include isolated and non-jurisdictional wetlands.

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

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map or any other relevant documentation to explain your determination.*

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

→ *You must determine that there are no practicable alternatives to wetlands development by completing the 8-Step Process.*

*Provide a completed 8-Step Process as well as all documents used to make your determination, including a map. Be sure to include the early public notice and the final notice with your documentation.*

*Continue to Question 3.*

3.

--



**Which of the following mitigation actions have been or will be taken? Select all that apply:**

- ☐ Permeable surfaces
- ☐ Natural landscape enhancements that maintain or restore natural hydrology through infiltration
- ☐ Native plant species
- ☐ Bioswales
- ☐ Evapotranspiration
- ☐ Stormwater capture and reuse
- ☐ Green or vegetative roofs with drainage provisions
- ☐ Natural Resources Conservation Service conservation easements
- ☐ Compensatory mitigation

#### **Worksheet Summary**

##### **Compliance Determination**

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

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

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

- ☐ Yes
- ☐ No



## Note 15 Wild and Scenic Rivers

**For compliance the following checklist has been completed for all Affordable Housing activities as described above at the program level.**

### Wild and Scenic Rivers (CEST and EA)

**1. Is your project within proximity of a NWSRS river as defined below?**

**Wild & Scenic Rivers:** These rivers or river segments have been designated by Congress or by states (with the concurrence of the Secretary of the Interior) as wild, scenic, or recreational

**Study Rivers:** These rivers or river segments are being studied as a potential component of the Wild & Scenic River system.

**Nationwide Rivers Inventory (NRI):** The National Park Service has compiled and maintains the NRI, a register of river segments that potentially qualify as national wild, scenic, or recreational river areas

☒ No

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation used to make your determination, such as a map identifying the project site and its surrounding area or a list of rivers in your region in the Screen Summary at the conclusion of this screen.*

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

→ *Continue to Question 2.*

**2. Could the project do *any* of the following?**

- Have a direct and adverse effect within Wild and Scenic River Boundaries,
- Invade the area or unreasonably diminish the river outside Wild and Scenic River Boundaries, or
- Have an adverse effect on the natural, cultural, and/or recreational values of a NRI segment.

Consultation with the appropriate federal/state/local/tribal Managing Agency(s) is required, pursuant to Section 7 of the Act, to determine if the proposed project may have an adverse effect on a Wild & Scenic River or a Study River and, if so, to determine the appropriate avoidance or mitigation measures.

**Note:** Concurrence may be assumed if the Managing Agency does not respond within 30 days; however, you are still obligated to avoid or mitigate adverse effects on the rivers identified in the NWSRS



- ☐ No, the Managing Agency has concurred that the proposed project will not alter, directly, or indirectly, any of the characteristics that qualifies or potentially qualifies the river for inclusion in the NWSRS.

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation of the consultation (including the Managing Agency's concurrence) and any other documentation used to make your determination.*

- ☐ Yes, the Managing Agency was consulted and the proposed project may alter, directly, or indirectly, any of the characteristics that qualifies or potentially qualifies the river for inclusion in the NWSRS.

→ *Continue to Question 3.*

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

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

### **Worksheet Summary**

#### **Compliance Determination**

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

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

Attached please find a map showing there are no Wild and Scenic Rivers located within the City of Worcester.



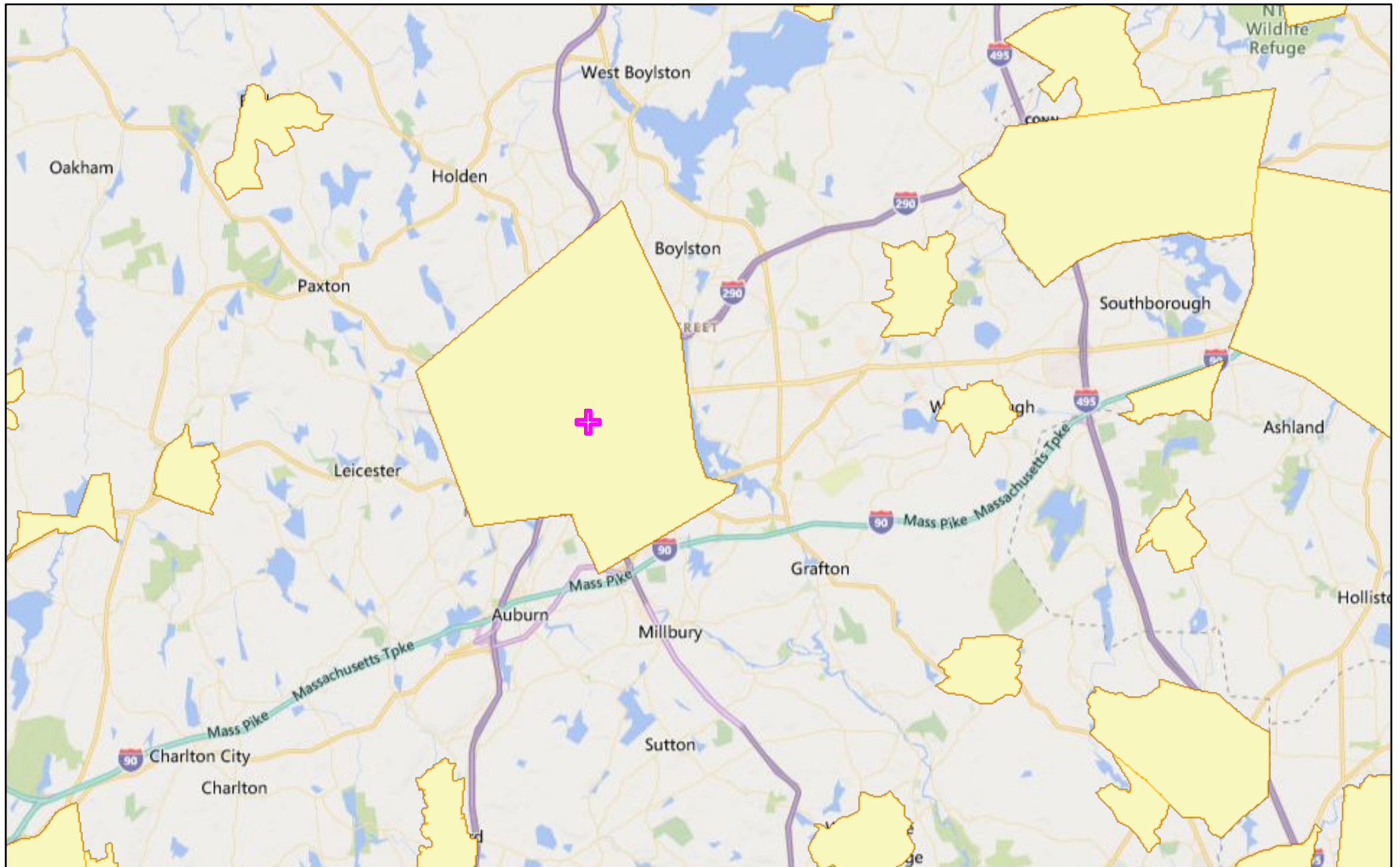
**Are formal compliance steps or mitigation required?**

☐ Yes



☒ No




## NOTE 15 Wild & Scenic Rivers



June 15, 2020

 Search Result (point)  City Boundary

 Wild and Scenic Rivers

1:288,895  
0 1.75 3.5 7 mi  
0 2.75 5.5 11 km  
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## Note 16 Environmental Justice

For compliance, the following checklist will be completed at the project level.

### Environmental Justice (CEST and EA)

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 → Continue to Question 2.

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

2. Were these adverse environmental impacts disproportionately high for low-income and/or minority communities?

☐ Yes

Explain:

→ Continue to Question 3. Provide any supporting documentation.

☐ No

Explain:

→ Continue to the Worksheet Summary and provide any supporting documentation.

3. All adverse impacts should be mitigated. Explain in detail the proposed measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.

☐ Mitigation as follows will be implemented:



→ Continue to Question 4.

☐ No mitigation is necessary.

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

→ Continue to Question 4.

**4. Describe how the affected low-income or minority community was engaged or meaningfully involved in the decision on what mitigation actions, if any, will be taken.**

→ Continue to the Worksheet Summary and provide any supporting documentation.

### **Worksheet Summary**

#### **Compliance Determination**

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

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



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

☐ Yes

☐ No