

Official HUD Response to Public Comments Received on Preliminarily Determined Finding of No Significant Impact (FONSI), East Chicago Housing Authority: West Calumet Demolition

September 18, 2017

I. Purpose

This document responds to the concerns and questions raised by commenters on the preliminarily determined Finding of No Significant Impact, East Chicago Housing Authority: West Calumet Demolition.

II. Background

On July 25, 2016, the East Chicago Housing Authority (ECHA) submitted a Section 18 demolition application to U.S. Department of Housing and Urban Development (HUD) requesting approval to demolish the West Calumet Housing Development located at 4920 Larkspur Drive in East Chicago, Indiana. In its application, the ECHA determined that the demolition of the housing development is warranted to protect human health. Prior to approving the application for demolition based upon environmental conditions under 24 CFR 970 (b)(ii), HUD is required to complete the environmental review in accordance with 24 CFR Part 50 and determine if environmental conditions exist on the site being proposed for demolition which jeopardize the suitability of the site or a portion of the site and its housing structures for residential use. On May 26, 2017, HUD published a preliminarily determined Finding of No Significant Impact (FONSI) with mitigation for the proposed demolition of the West Calumet Housing Development. The ECHA has certified that there is no known proposed future use of the site following demolition at this time.

Built in 1972, the West Calumet Housing Development consists of 107 residential structures, an administration building, a community center, maintenance facility, guardhouse, and two storage sheds. The demolition project will include the removal of all residential and non-residential structures, other than the maintenance building, as well as foundations, roadway pavement, parking pavement, concrete and asphalt walkways. The removal intends to limit vegetation disturbance to that required to demolish and properly grade the site to meet storm water pollution prevention requirements.

HUD's original preliminary draft Environmental Assessment (EA) was based on an extensive demolition of all buildings (residential and non-residential), hardscape, infrastructure and utilities at the West Calumet Housing Development. Subsequent to that assessment and public comments received, the ECHA amended its project description limiting the scope of demolition. Specifically, the proposed project now eliminates the removal of all utilities. The EPA has indicated that, if demolition occurs in any capacity, it supports removal of slabs, sidewalks, parking lots, and roads (hardscapes). Finally, the ECHA amended its demolition request to not demolish the maintenance building.

As part of the EA for the demolition project, HUD required that a Remedial Action Plan (RAP) be put in place to ensure that the demolition activities do not cause releases of contaminated materials beyond the boundaries of West Calumet Housing Development. In April of 2017, ECHA submitted the RAP for proposed demolition work at the West Calumet Housing Development for the EPA's review, because the West Calumet Housing Development is part of the U.S. Smelter and Lead Refinery, Inc. Superfund Site. EPA reviewed the measures outlined in the RAP to ensure that the demolition work would not cause releases of contaminated materials beyond the

boundaries of the West Calumet Housing Development and that the contaminated soils left behind do not pose an immediate threat to public health and the environment. EPA did not review the scope of requirements of the demolition work itself. The sole purpose of EPA's review was to ensure that contamination already present at West Calumet Housing Development does not leave the boundaries of that property during and after the demolition. Based upon its review of the RAP, EPA has concluded that, if the RAP is effectively implemented, it is unlikely the demolition work will exacerbate the scope of contamination at the Site or cause releases beyond the project boundaries. EPA is willing to work with the ECHA to ensure that it effectively implements the RAP.

During the demolition, ECHA demolition contractors procured by the ECHA, once selected and retained, will put into place interim controls and mitigating measures to ensure that the site is stabilized, maintained and secure. The demolition contractors will grade the site to meet storm water runoff requirements. The contractors will also cover the site with top soil and seed it as necessary. The contractors may bring onto the site a limited quantity of backfill, primarily black dirt, to ensure adequate vegetative growth on the property. This additional backfill would also ensure that there are no significant depressions in the soil that could pose a safety concern. The contractors will also replace the existing fence along the perimeter with a new fence to surround the entire project site. All demolition contractors procured by the ECHA and all contracts executed for the project will be required to complete the demolition activities in accordance with the RAP. ECHA's Engineering Consultant will be monitoring day-to-day project activities and the EPA will be working with ECHA and their Independent Third Party Contractor to ensure that it effectively implements the requirements under the RAP requirements.

Based on the information reviewed, HUD has determined that with the interim controls and mitigating measures that have been developed and are to be put in place the project would have no significant impact on the human environment. Because there is no known reuse of the site at this time, HUD has determined that an Environmental Impact Statement (EIS) under the National Environmental Policy Act of 1969 (NEPA) is not required. Prior to any obligation of Emergency Capital Finds, an agreement between the EPA and ECHA regarding the oversight and monitoring of the conditions in the remedial action plan (RAP) related to the demolition must be executed. The agreement should outline the roles and responsibilities of each party. The field office will place a zero threshold on the grant until an executed copy of the agreement is provided to the field office and the SAC.

III. Discussion of Public Comments and HUD's Responses

A. Comments/Concerns of Residents and Advocates Requesting an Environmental Impact Statement

- Commenters requested a full Environmental Impact Statement giving more detail about the demolition project because they allege that the West Calumet Housing Complex demolition will significantly impact the environment.
- Commenters stated that HUD's finding of no significant impact is incorrect.

HUD Response: HUD does not believe that an Environmental Impact Statement (EIS) is required for the proposed action. The proposed action is a demolition only project with no known future use of the site at this time. HUD concluded an Environmental Assessment was appropriate for the proposed action in accordance with 24 CFR Part 50 Subpart E. The soils at the West Calumet Housing Development (Zone 1) have been characterized by EPA through a Remedial

Investigation and Remedial Design sampling. The Remedial Investigation completed in June 2012 determined the nature and extent of soil contamination within Zone 1. To further characterize the soils within Zone 1, EPA also completed Remedial Design sampling on Zone 1 in over 263 unique sample locations. A total of 1,118 soil samples spread across five depth intervals ranging from 0 to 30 inches have been analyzed from Zone 1. Therefore, it is the conclusion of HUD that additional environmental studies are not needed to move forward with the demolition of the housing development. Once the future use of the project site has been determined, a new NEPA environmental review will be required for any future HUD-assisted activities on the site.

B. Comments/Concerns that the Environmental Assessment does not provide sufficient information to justify the decision made regarding the method of demolition

- Commenters stated that the Environmental Assessment provides insufficient information to justify the method of demolition proposed.
- Commenters requested additional information about the demolition including a comparison of the environmental impact of full demolition that removes utilities compared with the environmental impact of a partial demolition that removes the buildings only.

HUD Response: HUD conducted an Environmental Assessment, including evaluating three alternatives. HUD and ECHA originally concluded that the alternative (Complete Demolition of all Structures, Hardscape and Infrastructure) was the most cost effective way to ensure health and safety of the community and to stabilize and contain the contaminated site. After further analysis and in consideration of public comments, the project no longer includes full demolition that removes utilities.

C. Comments /concerns raised that the Remedial Action Plan does not provide sufficient measures to prevent dust emissions from the demolition

- In the absence of an EIS, commenters requested that the Remedial Action Plan be improved to provide sufficient measures to prevent dust emissions from the demolition including sweeping of roadways, decontamination of vehicles, use of water sprayers to manage dust, and opacity testing.
- Commenters requested that the Air Monitoring Plan should be more detailed, more protective including particulate matter monitoring, correcting the plan's reliance on allegedly incorrect information, addressing additional contaminants of concern, and extending the plan to the harbor including the hospital.
- Commenters requested additional protections be put in place in case air monitor alarms go off.
- Commenters inquired as to how windy it would have to be before demolition would be suspended.
- Commenters inquired if there was an evacuation plan in case of blowing wind and how long the plan anticipated it would take for an evacuation.
- Commenters inquired as to how the dust would be prevented from blowing to neighboring areas in general and during high wind.
- Commenters inquired as to how high the fences would be surrounding the project and whether the fences will stop the dust from blowing from West Calumet to Calumet.
- Commenters inquired whether houses bordering the area will need to be sprayed or treated in some way during the demolition due to dust emissions.
- Commenters inquired as to whether neighbors would need to take any specific precautions (such as wearing masks) during the demolition.

HUD's Response: As part of the environmental review, HUD required that the ECHA develop a RAP and have it reviewed by EPA. The ECHA's third-party

independent consultant prepared the RAP and provided it to HUD and the EPA on March 30, 2017. The EPA provided comments on the RAP, as detailed in the EPA Letter to HUD and the ECHA's Consultant, dated April 7, 2017. EPA's comments were incorporated into the final RAP that was issued and provided to HUD on April 13, 2017.

The RAP includes detailed measures to control dust emissions developed in part based on comments from the EPA. In its development of the suggested screening levels for airborne arsenic and lead during the demolition, the EPA used conservative assumptions. Screening for airborne arsenic and lead levels will be conducted through an electronic measuring and monitoring system. The 68 ug/m³ total airborne dust action level contained in the RAP is much lower than the standard EPA action level of 150 ug/m³. The air monitors will be set to alarm at 68 ug/m³, instead of the standard 150 ug/m³, at which time additional dust control measures would be implemented to ensure airborne dust does not travel from the site. Furthermore, additional conservative assumptions were used by EPA to calculate the suggested lead and arsenic screening levels. To calculate the screening levels, EPA used the highest concentration of both lead and arsenic found in the top six inches of the site. Under standard EPA protocols, the median is used to calculate a screening level, but to provide an additional level of protection for the West Calumet demolition project, the EPA recommended using the highest concentration in the top six inches. HUD views the screening levels for airborne arsenic and lead calculated by the EPA to be protective of both workers and nearby residents. All dust producing activities will be suspended when wind speeds reach 25 miles per hour for at least five minutes in a one-hour period. All the EPA's conservative assumptions were incorporated into the RAP and will be used to screen for airborne levels of arsenic and lead. Other contaminants are not present in significant

quantities to warrant additions to the air monitoring plan. The proposed fence as described in the RAP is six feet high. This fence is mainly for security and not dust control. Dust control measures will be implemented pursuant to the RAP. Air Monitoring and Sampling Dust control measures as described in the RAP will be strictly implemented to prevent the spread of contaminated soil via air. There is no scheduled spraying or treatment planned for outside the demolition work area. RAP measures will be taken onsite within the demolition limits to prevent dust emissions. Given the measures in place and regular monitoring related to dust emissions, it is not anticipated that neighboring properties will need to take precautions during demolition activities. Vehicle decontamination measures described in the plan will be strictly implemented to prevent contaminated soil spread or transfer outside the demolition site boundaries. Ambient air at the site will be continuously monitored and tested throughout the demolition process in accordance with the RAP that was reviewed by EPA. The RAP specifies proven practical and commonly used measures to prevent public exposure to contaminated media. Specific to the comment raised regarding opacity testing, mitigation and control measures will be determined upon selection of the demolition contractor once procured by the ECHA for the project. After consultation with the EPA, HUD has determined that spraying or treatment of neighboring households during the demolition to control dust emissions is not required, since the alarms are scheduled to sound if dust levels exceed 68 ug/3M. In addition, HUD, in consultation with the EPA, has concluded that based upon the extensive air monitoring provisions contained in the RAP no additional precautions are necessary to detect if unacceptable levels of lead and arsenic dust are being generated. Importantly, the RAP has been drafted for a more extensive excavation activity than is now being proposed, resulting in monitoring and control measures that exceed what would normally be required, further reducing the risk of any exposure outside of the demolition site boundaries.

D. Comments/concerns related to contaminated ground water

- Commenters raised concerns regarding the risks associated with contaminated groundwater and possible runoff are not adequately mitigated in the Remedial Action Plan and requested that the RAP's discussion of and plan for preventing risk from contaminated groundwater be improved.
- Commenters inquired as to how specifically will the run-off water from washing trucks be collected and treated during demolition.
- Commenters inquired whether contaminated water would be used in demolition procedures including to hose down trucks and airborne dust, and if so, how would the water be treated.
- Commenters inquired as to how contaminated groundwater would be prevented from spreading to neighboring areas.

HUD Response: The environmental review is conditioned upon implementation of the RAP that HUD required be developed by the ECHA and the ECHA's consultant. This plan was submitted to the EPA for review and comment prior to being finalized. The EPA provided specific comments on the remedial action plan. Consistent with the RAP, during the demolition, no contaminated water will be used. If contaminated water is encountered, it will be containerized, treated onsite and sampled prior to discharge. Seepage groundwater will be intercepted, collected, treated, and used on site as described in the RAP. Provisions covering the treatment of any contaminated water that may be encountered during demolition are detailed in Section 8.4 of the RAP. Discharging will include utilization of the City's sewer system, and only treated or clean water may be used for dust control. There will be no groundwater runoff. A Storm Water Pollution Prevention Plan (SWPPP) is required to address storm water runoff. The SWPPP will be prepared in accordance with EPA and Indiana Department of Environmental Management rules and

regulations. The SWPPP will be reviewed by appropriate governmental agencies prior to finalization and implementation. Rinse water for vehicles used during the demolition will be addressed as part of the SWPPP. HUD does not believe additional measures are needed. HUD has also confirmed that the EPA will be investigating groundwater through a new Remedial Investigation/Feasibility Study to determine if unacceptable risk is present, if additional remedial cleanup measures will be required, and that the demolition activities will not influence the EPA's groundwater investigation.

E. Comments/concerns related to contaminated soil

- Commenters inquired whether HUD will be removing toxic soil to remove the utilities and then returning the same toxic soil to the site, so that the soil could later be cleaned by the EPA to residential standards.
- Commenters stated that the RAP does not adequately manage the contaminated soil and requested that HUD improve the RAP's management of contaminated soil and address any removal of soil from the site as well as prohibit any reintroduction of contaminated soil or groundwater to the site.
- Commenters requested that HUD locate where the toxic waste is buried and ensure that it is cleaned and treated properly and not moved to another community.

HUD Response: No soil is being removed from the site as part of the proposed demolition. In addition, upon further evaluation and in consideration of public comments, underground utilities are no longer being removed. All demolition debris and waste that leaves the site will be properly characterized for disposal, in accordance with local, state and Federal rules and regulations.

F. Comments/concerns related to compliance with environmental justice regulations during demolition

- Commenters raised concerns that the environmental review did not comply with environmental justice regulations and requested that it be amended to comply.
- Commenters requested that HUD obtain another Environmental Assessment from an independent third party.
- Commenters requested that the RAP be amended to comply with CERCLA and RCRA.

HUD Response: HUD recognizes that West Calumet Housing Development has been a low-income and minority community. HUD believes that demolition of the project site will not create an adverse environmental impact to a low-income or minority community that is disproportionate to the community at large in the City of East Chicago. HUD has determined that demolition of the West Calumet Housing development is in the best interest of the community as leaving the buildings standing would create a public safety concern for the surrounding community. This environmental review is for demolition only and once the future use of the site is known, a new NEPA environmental review will be required for any future HUD assisted activities on the site. Furthermore, HUD believes the proposed demolition serves to promote environmental justice by eliminating exposure to the known contamination on the site. HUD does not believe that 24 CFR Part 50, which includes the Related Federal laws and authorities, such as Executive Order 12898, Environmental Justice, creates legal rights and remedies that would allow for a third party independent environmental review to be performed. Finally, the demolition application submitted by the ECHA is based upon “obsolescence as to location” under 24 CFR 970.15(b)(ii) which requires that HUD complete the environmental review for the proposed activity in accordance with 24 CFR Part 50. HUD’s Office of Fair Housing and Equal Opportunity (FHEO) has concurred with the environmental review’s determination on Environmental Justice.

G. Comments/concerns raised regarding the standards that will be used to monitor and treat the area during the process to ensure that toxic materials are not spreading

- Commenters stated that the buildings in the West Calumet site are severely contaminated and requested that the building debris be tested during the demolition process to determine the proper disposal of the potentially toxic debris.
- Commenters requested that neighboring properties in impacted area be tested throughout the demolition process to ensure they are not being contaminated by the demolition debris and dust.
- Commenters requested information regarding what methods and technologies will the contractors use to monitor for toxins arising due to the demolition and which toxins will be monitored and tested for.
- Commenters requested RAP be amended to include additional investigation identifying the source area and delineating the contamination vertically and horizontally.
- Commenters requested that the RAP be amended to improve the plan for management of asbestos.
- Commenters requested information regarding the sampling grid for testing and inquired as to when the sampling grid would be determined.

HUD Response: The RAP covers in detail the methodology, testing and proper disposal of all building and hardscape material and debris. The RAP already provides provisions to ensure the health and safety of nearby residents and the surrounding community. HUD does not believe additional provisions need to be made. All demolition waste that leaves the site will be properly characterized for disposal, in accordance with local, State and Federal rules and regulations. In addition to dust source monitoring, perimeter monitoring will be conducted to ensure that the procedures defined in the RAP and in future Project Specifications that will

be developed, adequately suppress dust emissions. Offsite monitoring should not be necessary. All chemicals of concern contained in the soil will be monitored by an independent contractor, as provided in the RAP. In preparing the environmental review, an Asbestos Survey was prepared by the Engineering Consultant. The Asbestos Plan for addressing asbestos found on site is included in the RAP, has been reviewed by the EPA, and is in conformance with applicable Federal, State and local law and industry standards. The fixed, perimeter air monitoring locations are included within the RAP. Sampling Grid soil testing is not within the scope of the work for this demolition-only environmental review. ECHA demolition contractors will not be testing soil for contamination already identified by the EPA. No soil is being removed from the site as part of the proposed demolition. Any contaminated soil encountered during the demolition project will be managed and controlled in accordance with the RAP as monitored by the independent third-party consultant.

H. Comments/concerns related to Future Environmental Studies

- Commenters inquired about an additional environmental assessment that HUD may complete once the future use is known for the site and wanted to know what the relationship is between any future environmental reviews prepared by HUD and the environmental review and work to be completed by EPA.
- Commenters requested explanation as to how HUD's timeline for a future environmental assessment fits with EPA's timeline for issuing a new feasibility study and/or EPA's timeline for implementing its cleanup plan for the site.
- Commenters inquired whether HUD's environmental review under NEPA will be conducted prior to the EPA's preparation and plan, or vice versa.
- Commenters asked if both HUD's environmental review under NEPA and the EPA's preparation and plan reviews are required, and if one review occurs prior to the other, must the latter proposed environmental plan comply with the findings/procedure of the former plan

HUD Response: There is no known future re-use of the site. The timing and coordination of future NEPA environmental reviews cannot be determined until the future use of the property has been determined. HUD will continue to work closely with the EPA on all future HUD-assisted activities on the site and related required environmental reviews once the future use of the site has been determined. Prior to any obligation of Emergency Capital Finds, an agreement between the EPA and ECHA regarding the oversight and monitoring of the conditions in the remedial action plan (RAP) related to the demolition must be executed. The agreement should outline the roles and responsibilities of each party. The field office will place a zero threshold on the grant until an executed copy of the agreement is provided to the field office and the SAC.

I. Comments/Concerns regarding the methods being chosen for the demolition

- Commenters inquired as to how HUD will remove concrete, asphalt walkways, and underground utilities from contaminated soil without endangering public health.
- Commenters stated that there is a recognized procedure used for asbestos removal and asked if a similar process will be followed for other contaminants.
- Commenters inquired why HUD was planning on doing a complete demolition that would disturb contaminated soil and ground water but not remediate the area at the same time, and requested that demolition and remediation be done together.
- Commenters inquired as to whether the type of demolition being planned for the site would be considered unusual, and if so, in what way is it unusual.
- Commenters inquired whether HUD has any experience in demolishing such a large area in a Superfund site and if so, how many such sites has HUD handled.

- Commenters requested information regarding what plans were in place to notify the community if there were any accidents or emergency incidents at the West Calumet site during the demolition that would affect the public health of the community.
- Commenters requested that community members be included in HUD's committees and in HUD's decision-making process, akin to a "tribal council."
- Commenters inquired whether Section 8 landlords and residents in Zone Two and Three living in subsidized housing were being notified of the meetings and of the demolition information.
- Commenters requested that HUD consider the use of "tenting" for the project, due to the risk-level of the demolition.

HUD Response: Throughout the notice and comment period, several commenters appear to raise comments based on a misconception that HUD is undertaking the demolition, whereas it is the ECHA, as a grantee of HUD, that has requested HUD approval for demolition of the West Calumet Housing Development. The ECHA will be undertaking the proposed activity, not HUD. In conducting the environmental review, HUD has taken steps to ensure that controls and monitoring plans were adopted by the ECHA for the proposed demolition of the site. The RAP's controls and provisions that have been put in place will prevent contaminated soil from reaching the surrounding communities during the removal of concrete asphalt walkways by the ECHA in their proposed project. Upon further evaluation and in consideration of public comments, underground utilities are no longer being removed. There will be no contamination pathway between the contaminated media and the public. In addition, HUD believes that the activities to be conducted do not warrant "tenting" at this time. Any demolition debris and waste will be fully characterized prior to leaving the site and disposed of in accordance with the RAP. In addition to the Asbestos Plan and Protocol incorporated into the RAP, all other

contaminant-specific procedures and requirements are specified in the RAP and have been reviewed by the EPA. Demolition of aged and obsolete public housing developments is not considered unusual. The West Calumet site is uncommon due to its location on a Superfund site. HUD has established a Superfund Working Group that is evaluating other public housing developments located on or near Superfund sites. The Health and Safety Plan attached as Appendix B to the RAP currently does not provide specific notification to the community. HUD is requesting the ECHA and ECHA's consultant to prepare a supplement to the RAP with specific procedures to notify the community in the event of any accidents or emergency incidents, were that to occur during the demolition process. Former residents and members of the community were involved in meetings in August 2016 and have been given the opportunity to comment on HUD's environmental review.

J. Comments/Concerns regarding the method for monitoring the work to be done on the property

- Commenters inquired who will monitor the construction company while they work on the site and requested that the engineers and contractors work closely with the community as the work is being done.
- Commenter expressed belief that East Chicago Housing Authority had not adequately protected the health of residents at the West Calumet site, requested that ECHA not be allowed to monitor the work being done on the property, and inquired who will ensure the safety of the residents of the surrounding areas and ensure that toxins are not spread in the area.

HUD Response: Monitoring of site conditions during the ECHA's demolition project will include a multi-pronged approach. The demolition contractor(s) once procured by the ECHA for the project will be monitored by a third-party Engineering Consultant. Contractors will be responsible for worker monitoring, in compliance

with OSHA requirements. Site monitoring of worker safety and demolition procedures will be conducted upwind of potential dust-producing activities. Perimeter ambient air monitoring will be conducted to evaluate offsite dust migration. The RAP's Health and Safety Plan is being implemented to protect all residents in the community and workers. The site will be stabilized prior to conclusion of the demolition project. This stabilization is intended to prevent erosion and prevent access to the property. This stabilization will be in place until EPA begins remediation of the site.

K. Comments/concerns related to Future Use and Redevelopment of the West Calumet Site Environmental Studies

- Commenters requested information regarding comprehensive redevelopment plans for the property.
- Commenters inquired as to what portion of the site will be set aside for affordable housing.
- Commenters inquired whether displaced residents will be granted priority/preference and the right to return if the property is redeveloped for residential use.
- Commenters inquired as to whether the area could be adequately cleaned to the point that it would ever be able to be used as residential again.
- Commenters requested information as what actions will be taken after the demolition of the structures.
- Commenters requested that the RAP be amended to include the development of an Operations and Maintenance Program to ensure that environmental conditions are not exacerbated in the future.

HUD Response: The environmental review performed was completed under 24. CFR Part 50 as a demolition-only environmental assessment. Currently, there is no

known future re-use of the site. Once the future use of the site is known, a new NEPA environmental review will be required for any further HUD-assisted activities on the site. The Operations and Maintenance Plan is a document that will be developed at the time of demolition project design.

L. Certain additional general comments/concerns expressing desire for information regarding demolition plans for property

- Commenter inquired as to when is work intended to begin.
- Commenter inquired how HUD plans to comply with 24 CFR 135 (Section 3 resident participation) in regards to work on the property.
- Commenter asked if contractors will work Sundays (that could interrupt church services).
- Commenter inquired if there would be local contractors, residents, and people of color hired to work on the demolition.

HUD Response: In accordance with the provisions of the RAP incorporated into HUD’s environmental review, the intent is to work Monday thru Friday during daylight hours. However, if a critical task requires work on Sunday, it will be conducted in a manner to minimize disruption to the surrounding community. Additionally, if Sunday work does become a necessity, the Owner will communicate with area businesses and organizations to ensure that activities minimize disruption. Furthermore, excluding the hauling of waste building materials from the site, all activities will be isolated to the site and should have minimal impact to the surrounding neighborhood. All trucks entering and leaving the site will utilize major roadways which will be defined in the project specifications. All HUD-assisted projects are required to comply with 24 CFR Part 135. Pursuant to Section 3 of the Housing and Urban Development Act of 1968, HUD will “ensure that employment

and other economic opportunities generated by certain HUD financial assistance shall, to the greatest extent feasible, and consistent with existing Federal, State and local laws and regulations, be directed to low and very low income persons, particularly those who are recipients of government assistance for housing, and to business concerns which provide economic opportunities.”

M. Comments/concerns regarding general health effects from demolition

- Commenters inquired what the potential health risks are because of the demolition and expressed concern that the demolition would have negative public health effects.
- Commenters expressed concern that insufficient attention is focused on the former residents’ health, the health effects of the demolition, and the long-term effects of the lead and inquired if HUD had records of the illness and death rates of former residents.
- Commenter inquired whether the Health Department is testing children who lived in the building.
- Commenter inquired whether former residents will be monitored and tested in the future for possible medical issues.
- Commenters inquired whether residents would be compensated for any health issues that may have arisen due to toxins from living in Zone One, Two or Three, and also for any medical problems that may develop in the future.

HUD RESPONSE: The environmental review and the RAP are being implemented to prevent public exposure to contamination from the site during demolition activities. The site will be stabilized prior to conclusion of the demolition project. This stabilization is intended to prevent erosion and prevent access to the property. This stabilization will be in place until the EPA begins remediation of the site. The health monitoring and testing of former residents for possible future medical issues is not within the scope of this environmental review. Former residents and children

with elevated blood-lead levels should continue to be referred to the local Health Departments.

N. Commenters requested an additional meeting to discuss their concerns and obtain responses from HUD and other government officials

HUD RESPONSE: On August 29, 2017, representatives from HUD met with former residents, representatives from the ECHA resident council, advocacy groups and community members. HUD explained at the meeting that upon further evaluation and in consideration of public comments, the scope of the demolition project would be limited to hardscapes only. HUD specifically informed those in attendance that utilities are no longer being removed and accordingly the scope of excavation activities and ground disturbance will now be limited. As described in the ECHA's revised Project Description, it should also be noted that the Maintenance Facility is no longer going to be demolished.

HUD explained that the RAP that was prepared by the ECHA's engineering consultant and reviewed by the EPA contains detailed plans that minimize any disruption to the surrounding community and ensures the health and safety of nearby residents. In response to comments, HUD informed the citizens in attendance at the meeting that there is no known future use of the property at this time and the scope of the project is limited to demolition activities and site stabilization. Residents raised questions concerning interim controls and mitigating measures put in place. HUD representatives reiterated that provisions protecting the surrounding community are incorporated into the RAP. Certain residents indicated that they had not seen the RAP. HUD representatives informed them that the environmental review record, including the RAP, would continue to be accessible electronically, and at the ECHA's Website, and via hard copy at the HUD Indianapolis Field Office

and at the ECHA Office. A copy of the RAP will be made available in the local Library.

In addition, HUD went on to clarify that the demolition will be completed in accordance with the specific terms and provisions of the RAP and the EPA will be working with the ECHA to ensure that RAP is effectively implemented. Furthermore, once selected, the demolition contractor will be required to complete and execute project design in accordance with the terms and conditions of the RAP.

In response to questions raised regarding the procurement of the demolition contract and project status updates, HUD encouraged former residents, resident advisory board members, and other interested parties to attend ECHA's regularly scheduled monthly Board meetings.

HUD explained that a supplement to the RAP is being drafted that will contain community notification procedures to address any situations that may arise during demolition. HUD provided general information on how a housing authority proceeds with a Section 18 demolition request and the steps involved. An environmental review must be conducted and completed prior to a decision to act upon a housing authority's demolition request and the release of any associated funding. HUD informed the group that with the change in scope of the project,

anticipated project costs will be reduced. The revised demolition budget is currently being finalized and will be publicly available at the ECHA and as part of the environmental review.