

**Environmental Assessment  
Determinations and Compliance Findings  
for HUD-assisted Projects  
24 CFR Part 50**

**Project Information**

**Project Name:** West-Calumet---East-Chicago-Housing-Authority

**HEROS Number:** 900000010023524

**Applicant / Grant Recipient:** East Chicago Housing Authority

**Point of Contact:** Javier R. Chavez , Director PH Operations

**HUD Preparer:** Tedd Taylor Termunde

**Consultant (if applicable):** Amereco, Inc.

**Point of Contact:** Zachary Heine, CHMM

**Project Location:** 4920 Larkspur St, East Chicago, IN 46312

**Additional Location Information:**

West Calumet Housing Development- AMP 3- East Chicago Housing Authority, 4920 Larkspur, East Chicago, IN See, Attached Project Site Map(s) - Original and Revised Project Description

**AMP or AMPs, if any, covered in this review:**

| AMP 1       | AMP 2 | AMP 3 | AMP 4 | AMP 5 |
|-------------|-------|-------|-------|-------|
| IN029000006 |       |       |       |       |

**Does this review cover a full or partial AMP?**

Full AMP.

Partial AMP.

N/A

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

Due to the known environmental conditions existing onsite, the East Chicago Housing Authority has determined that the demolition of the West Calumet Housing Complex is warranted to protect human health. The demolition of the improvements onsite will ensure that the ECHA does not provide substandard housing or housing that has the potential to impact human health. Built in the 1972, the West Calumet Housing Complex consists of all residential structures, an administration building, a community center, maintenance facility, guardhouse, and two storage sheds. The demolition project originally evaluated the removal of all improvements onsite including the removal of hazardous building materials (asbestos), razing the structures, removal of the foundation and backfill. In addition to structure removal, all improvements from the property that were to be removed included roadway pavement, parking pavement, concrete and asphalt walkways, underground and overhead utilities, lighting, etc. After further analysis and in consideration of public comments, the ECHA amended its project description limiting the scope of demolition. The final project no longer includes removal of the utilities. In addition, the project no longer includes demolition of the maintenance facility. Vegetation disturbance will be limited to that required to demolish and clean backfill will be brought on site and properly graded to meet storm water pollution prevention requirements. It is anticipated that Aster Avenue, Larkspur Avenue, Jonquil Lane, 150th Place, 151st Place will be removed. Gladiola Avenue and Magnolia Drive will be removed, but it is yet to be determined if they will be removed in their entirety. There is no known proposed future use of the site following demolition at this time. The activity will be limited to existing hardscapes described above. Interim controls and mitigating measures will be put in place to ensure that the site is stabilized, maintained and secured pending future use. As mentioned before the site will be graded to meet storm water runoff requirements, topped with top soil and seeded. For additional information, see "Project Description, Purpose, Need, Objectives and Alternative Memorandum", "Project Description Addendum" and the HUD Form 53245 forms that have been uploaded in Section 4100 (Environmental Assessment Analysis) of this HEROS assessment under "Other Documentation".

**Does this project involve over 200 lots, dwelling units, or beds?**

No

- ✓ Yes (Consult early with the Environmental Clearance Officer (ECO), who is required to sign off on this project if it requires an Environmental Assessment)

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

It is HUD policy that all properties that are being proposed for use in HUD programs be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of the occupants or conflict with the intended utilization of the property. This EA is for demolition only to ensure the health and safety of the residents and that environmental conditions exist on the project site that jeopardize the suitability of the site for residential use in its current condition. Once the future use of the site is known, a new NEPA environmental review will be required for future HUD assisted activities on the site. See, "Project Description, Purpose, Need, Objectives and Alternative Memorandum" and "Project Description Addendum" that have been uploaded in Section 4100 (Environmental Assessment Analysis) of this HEROS assessment under "Other Documentation".

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

The West Calumet Public Housing Development was originally built on the former Anaconda Copper Mining Company/International Smelting and Refining Company site, which is now part of a USS Lead Superfund site. The site was placed on the National Priorities List in 2009, and the initial Record of Decision (ROD) was released in November 2012. EPA covered patches of bare dirt at the West Calumet Public Housing Development to provide a temporary, protective barrier from lead-contaminated soil. EPA's website states that there continue to be risks of exposure to high levels of lead in the soil, particularly for young children. See, "Project Description, Purpose, Need, Objectives and Alternatives Memorandum Alternative Memorandum" and "Project Description Addendum" that have been uploaded in Section 4100 (Environmental Assessment Analysis) of this HEROS assessment under "Other Documentation".

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

[Updated September 2017 W Calumet Site Location Map.pdf](#)  
[Property - Project Site Location Maps EC-WC Part 50.pdf](#)  
[EC Site Visits - Sept 2016 and Feb 2017 Photos.pdf](#)

**Determination:**

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

|                            |  |           |            |
|----------------------------|--|-----------|------------|
| <b>Review Certified by</b> | Jane Hornstein, Director, Special Application Center | <b>on</b> | 09/19/2017 |
|----------------------------|--|-----------|------------|

**Funding Information**

| Grant / Project Identification Number | HUD Program    | Program Name  |
|---------------------------------------|----------------|---|
| IN36E0029501-16                       | Public Housing | Public Housing Capital Fund (including CFFP and other grants) |

**Estimated Total HUD Funded, Assisted or Insured Amount:** \$4,000,970.00

**Estimated Total Project Cost [24 CFR 58.2 (a) (5)]:** \$5,660,146.00

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

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

|  |  |  |
|--|--|--|
|  |  | <p>future use nor any planned new construction being proposed on the project site at this time. The project area is located in Zone X, FEMA FIRM Map and Panel Numbers 0038E, 18089C0038E and 0126E, 18089C0126E. This EA 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. Current FEMA Maps will need to be re-evaluated at the time of any required subsequent environmental review. ADD UPDATED PHASE 1 CLEAN MAPS</p>   |
| <p><b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 &amp; § 58.5</b></p>                          |  |  |
| <p><b>Air Quality</b><br/>Clean Air Act, as amended, particularly section 176(c) &amp; (d); 40 CFR Parts 6, 51, 93</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> | <p>Based on the project description, this project includes no activities that would require further evaluation under the Clean Air Act. The project is in compliance with the Clean Air Act. The project will involve the demolition of the improvements associated with the West Calumet Housing Public Housing Development and there is no known future use nor any planned new construction being proposed on the project site at this time. The Consultant provided final Asbestos Report dated 2/15/17 indicating certain materials will need to be removed and abated prior to the start of any demolition following all applicable, Local, State and Federal Law. Approval of this environmental review Part 50 for the demolition only activity is conditioned on the abatement identified in the Asbestos Report as well as any and all requirements outlined in the Remedial Action Plan for Demolition approved by the EPA. See Section 5000 (Mitigation Measures and Conditions) "Final RAP, Appendix C - ACM Survey dated April, 13, 2017" for applicable Asbestos RAP provisions. This EA is for demolition only and once the future use</p> |

|  |  |   |
|--|--|---|
|  |  | <p>of the site is known, a new NEPA environmental review will be required for any future HUD assisted activities on the site.</p>   |
| <p><b>Coastal Zone Management Act</b><br/>Coastal Zone Management Act,<br/>sections 307(c) &amp; (d)</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> | <p>Based on the project description the project does not include any activities that would affect a Coastal Zone. The project is in compliance with the Coastal Zone Management Act. Consultant indicated and HUD verified with State of Indiana Coastal Zone Manager that no Federal Consistency Review is required for the proposed demolition activity of the West Calumet Public Housing Development project site. Once future use of the site has been determined, the Indiana Coastal Zone Manager should be consulted for the yet to be determined future use activity on the project site to confirm and determine if a Federal Consistency Review is required. This EA 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.</p> |
| <p><b>Contamination and Toxic Substances</b><br/>24 CFR 50.3(i) &amp; 58.5(i)(2)]</p>                    | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> | <p>Site contamination was evaluated as follows: ASTM Phase I ESA, ASTM Phase II ESA (including a full Site Characterization) and ASTM Vapor Encroachment Screening. On-site or nearby toxic, hazardous, or radioactive substances were found that could affect the health and safety of project occupants or conflict with the intended use of the property in its current condition. The ASTM Phase I identified 9 REC's on the project site: (1) evidence of historic bulk petroleum storage onsite; (2) identified historic rail spurs identified onsite; (3) identified historic PCB containing equipment onsite; (4) identified historic bulk oil storage identified onsite (5) the known contamination of lead and arsenic in onsite soils; (6) identified historic metal</p>   |

|  |  |   |
|--|--|---|
|  |  | <p>refining and industrial operations identified on (south) adjoining site; (7) historic industrial operations and bulk oil storage identified on (southeast) adjoining site; (8) The USS Lead refinery superfund site at 5300 Kennedy Ave; and (9) evidence of vapor encroachment conditions on site. The ASTM Phase I, Phase II ESA's and a REC Location Map are uploaded and attached as support documentation in this Section. The adverse environmental impacts of the demolition-only activity can be mitigated. See, Section 5000 (Mitigation Measures and Conditions). With the mitigation being implemented and monitored, the demolition activity will be in compliance with contamination and toxic substances requirements. Approval of the EA for the demolition only activity is conditioned upon the specific terms identified in the Remedial Action Plan reviewed by the EPA for the project site as an identified NPL site. This EA 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.</p> |
| <p><b>Endangered Species Act</b><br/>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> | <p>This project has been determined to have No Effect on listed species. This project is in compliance with the Endangered Species Act without mitigation. This EA 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 including a review of potential adverse impacts to then known listed endangered or threatened species and known critical habitats.</p>  |
| <p><b>Explosive and Flammable Hazards</b><br/>Above-Ground Tanks)[24 CFR Part 51 Subpart C</p>                   | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> | <p>Based on the project description the project includes no activities that would require further evaluation under this section. The project is in compliance</p>   |

|   |  |   |
|---|--|---|
|   |  | <p>with explosive and flammable hazard requirements. AST's have been identified that are not within statutory/regulatory range from the Project Site. The Project will involve the demolition of the improvements associated with the West Calumet Public Housing Development and there is no known future use nor any planned new construction being proposed on the project site at this time. This EA is for demolition only. Once future use of the site is known, a new NEPA environmental review will be required for any future HUD assisted activities on the site.</p>   |
| <p><b>Farmlands Protection</b><br/>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> | <p>This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is in compliance with the Farmland Protection Policy Act. Project is not located within Indiana Farmlands. Zoning for Project is Multi-Family Residential. The project will involve the demolition of the multi-family and non-dwelling structures associated with the West Calumet Public Housing Development and there is no known future use nor any planned new construction being proposed on the project site at this time. This EA 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.</p> |
| <p><b>Floodplain Management</b><br/>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>                              | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> | <p>This project does not occur in a floodplain. The project is in compliance with Executive Order 11988. Zone X, FEMA FIRM Map and Panel Numbers 0038E, 18089C0038E and 0126E, 18089C0126E. The project will involve the demolition of the multi-family and non-dwelling structures associated with the West Calumet Housing Complex and there is no known future use nor any</p>   |

|  |  |   |
|--|--|---|
|  |  | <p>planned new construction being proposed on the project site at this time. While the West Calumet Public Housing Development is not in a designated floodplain, the project is adjacent to a canal listed and designated by FEMA as Zone A. Demolition of the project site is conditioned upon such activities be completed and appropriate measures taken that will not disturb the adjacent Zone A. PHA contracts for demolition activities must contain provisions covering the avoidance of Zone A. This EA 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.</p>   |
| <p><b>Historic Preservation</b><br/>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> | <p>Based on Section 106 consultation there are No Historic Properties Affected because there are no historic properties present. The project is in compliance with Section 106. The project will involve the demolition of the multi-family and non-dwelling structures associated with the West Calumet Housing Complex and there is no known future use at this time at the project site at this time. The Indiana SHPO clearance provides that if during the course of the demolition activity any prehistoric or historic or archaeological artifacts or human remains are uncovered during construction, demolition, earthmoving activities, Indiana State Law requires that the discovery must be reported within two (2) business days to the Indiana Department of Natural Resources. Similarly, the consultation process with affected Indian Tribes and Tribal Historic Preservation Officers (THPO's) in Lake County, Indiana resulted responses to HUD as R/E that also requires that the demolition activity adhere to the Inadvertent</p> |

|  |   |   |
|--|---|---|
|  |   | Discovery Provisions provisions outlined under Indiana State Law (Indiana Code 14-21-1-27 and 29). PHA demolition contracts must contain provisions the will provide notice to the Indiana SHPO, Indian Tribes and THPO's if artifacts or remains are found and uncovered. This EA 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.  |
| <b>Noise Abatement and Control</b><br>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | The project is in compliance with HUD's Noise regulation with mitigation. This is a demolition only activity. Demolition activities are required to comply with existing local permitting requirements including any and all noise related conditions and noise mitigation provisions outlined on Page 15 of the RAP. Once a future use of the project site is known, a new NEPA environmental review will be required for any future HUD assisted activities on the site.  |
| <b>Sole Source Aquifers</b><br>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149                  | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | The project is not located on a sole source aquifer area. The project is in compliance with Sole Source Aquifer requirements.   |
| <b>Wetlands Protection</b><br>Executive Order 11990, particularly sections 2 and 5   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | The project will not impact on or off site wetlands. The project is in compliance with Executive Order 11990. The project will involve the demolition only of the multi-family and non-dwelling structures associated with the West Calumet Public Housing Development and there is no known future use nor any planned new construction being proposed on the project site at this time. While demolition activities will involve ground disturbance, the project is not located in a Wetland area. See, attached FWS-National Wetlands Inventory Map. |
| <b>Wild and Scenic Rivers Act</b><br>Wild and Scenic Rivers Act of 1968,   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | This project is not within proximity of a NWSRS river. The project is in  |

|   |  |  |
|---|--|--|
| <p>particularly section 7(b) and (c)</p>                      |  | <p>compliance with the Wild and Scenic Rivers Act. Indiana has no nationally designated wild and scenic rivers (See Attachment 1 Support Documentation). The NPS has identified 1 Study River Segment located in Lake County, Indiana not within proximity of the project site. (See Attachment 2 Support Documentation). This EA 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.</p>  |
| <p><b>HUD HOUSING ENVIRONMENTAL STANDARDS</b></p>             |  |  |
| <p><b>ENVIRONMENTAL JUSTICE</b></p>                           |  |  |
| <p><b>Environmental Justice</b><br/>Executive Order 12898</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> | <p>It is HUD policy that all properties used in HUD programs be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of the occupants or conflict with the intended utilization of the property. Demolition-only with no known future use of the project site will not create an adverse environmental impact that is disproportionate to a low-income or minority community. The proposed demolition and site stabilization are beneficial to the overall environment and health and safety of former residents as well as the community at large. The project is in compliance with Executive Order 12898. This EA 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.</p> |

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

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

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

| Environmental Assessment Factor          | Impact Code | Impact Evaluation | Mitigation |
|--|-------------|-------------------|------------|
| <b>LAND DEVELOPMENT</b>                  |             |                   |            |
| <b>SOCIOECONOMIC</b>                     |             |                   |            |
| <b>COMMUNITY FACILITIES AND SERVICES</b> |             |                   |            |
| <b>NATURAL FEATURES</b>                  |             |                   |            |

**Supporting documentation**

- [September 18 2017 Updated Phase 1 W Calumet Housing Complex E Chicago IN - 17.1151.6.pdf](#)
- [September 2017 RAP Supplement - Public Communication Plan - 17.1151.6.pdf](#)
- [4 13 17 RAP Appendix A.pdf](#)
- [4 13 17 Final Remedial Action Plan Demolition Monitoring Submission to EPA.pdf](#)
- [4 27 17 EPA Letter to PHA on EPA Monitoring of Demolition Activities in Zone 1 USS Lead\(1\).pdf](#)
- [East Chicago Remedial Stabilization Monitoring Plan Cost Estimate.pdf](#)
- [4-13-17 RAP Appendix E - WMP.pdf](#)
- [4 13-17 RAP Appendix D - AMSP.pdf](#)
- [4 13 17 RAP Appendix C - ACM Survey.pdf](#)
- [4 13 17 Appendix B - HASP \(1\).pdf](#)
- [4-13-17 RAP Memorandum.pdf](#)
- [Appendix E - WMP.pdf](#)
- [Appendix D - AMSP.pdf](#)
- [Appendix C - ACM Survey.pdf](#)
- [Appendix B - HASP \(1\).pdf](#)
- [RAP-EC Appendix A.pdf](#)
- [Remedial Action Plan.pdf](#)

**Additional Studies Performed:**

The following documents have been uploaded and attached here as part of the Environmental Review Record for this Part 50 Demolition-Only EA: 1. Project Description, Purpose, Need, Objectives and Alternatives Memorandum Alternative Memorandum" and "Project Description Addendum" (September, 2017) 2. HUD Form 52345 (s) - (original and revised) 3. 24 CFR 970.13 Certification of PHA of No Known Future Use

- [Revised Final September 2017 PHA HUD Form 53245.pdf](#)
- [Project Description Addendum - September 2017.pdf](#)

[PHA 970.13 Certification 1-4-17.pdf](#)

[HUD Form 52345 1-4-17 \(2\) \(003\).docx](#)

[West Calumet Project Description Justification; Purpose and Need; and Alternatives Doc 031317.docx](#)

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

Vahl; Sotirchos; Termunde

2/14/2017 12:00:00 AM

[EC Site Visits - Sept 2016 and Feb 2017 Photos.pdf](#)

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

ECHA, EPA, HUD, SHPO, INDIAN TRIBES AND TDHO's, CZM, USFWS, CITY, COUNTY, STATE

**List of Permits Obtained:**

All required local demolition permitting, reviews and approvals will be required at the time of demolition.

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

Ongoing outreach has occurred during the planning for the proposed demolition and would continue during the planning of the yet to be determined future use. See uploaded notices and HUD response to comments.

[Official HUD Response to Public Comments 91317.pdf](#)

[June 13 2017 PUBLIC NOTICE Extension of Public Comment Period and Notice of Public Hearing.pdf](#)

[!Final FONSI EC EA Notice \(004\)ch.sas.docx](#)

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

Demolition activity only-no known future use. This EA 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.

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

Alternatives considered are described in the " Project Description, Purpose, Need, Objectives and Alternatives Memorandum Alternative Memorandum" and "Project Description Addendum" uploaded below in this Section 4100 of this HEROS assessment and summarized below: 1. No Action Alternative (See box below and uploaded " "Project Description, Justification, Purpose and Needs and Alternatives Memorandum" attachment) 2. Partial Demolition Structures and Hardscape: Under this alternative, the ECHA would limit demolition activities to demolition of all residential structures, non-dwelling structures, parking lots, sidewalks and streets. Under this partial demolition scenario, a RAP will have to be prepared by ECHA and agreed to by the EPA because it is a Superfund site. Post demolition, the EPA may then proceed with an enforcement action to clean up the site to appropriate standards. 3.

Complete Demolition of All Structures, Hardscape and Infrastructure Under this alternative, the ECHA would demolish all improvements on the West Calumet site, including all residential structures, an administration building, a community center, maintenance facility, guardhouse, and two storage sheds. The demolition project would include the removal of all improvements onsite and the removal of hazardous building materials (asbestos), razing the structures, and removing foundations. The grading would then be leveled onsite, with backfill to the appropriate standard occurring. A limited quantity of backfill may be brought onsite to ensure adequate vegetative growth (primarily black dirt) and to ensure that there are no significant depressions that pose a safety concern. In addition to structure removal, all improvements from the property will be removed, including roadway pavement, parking pavement, concrete and asphalt walkways, underground and overhead utilities, and lighting. If ECHA pursues demolition users of the property will not be exposed to contamination. It will also reduce the likelihood of exposure due to trespassing. To reduce the risk of trespassing, fencing off the property and posting signage regarding the current conditions of the site will be required. Under this scenario, a RAP will have to be prepared by ECHA and reviewed by EPA because it is a Superfund site. 4.

Partial Demolition Structures and Hardscape (excluding Maintenance Facility): After further analysis and in consideration of public comments, the ECHA amended its project description limiting the scope of demolition. The final project no longer includes removal of the utilities. In addition, the project no longer includes demolition of the maintenance facility. Vegetation disturbance will be limited to that required to demolish and clean backfill will be brought on site and properly graded to meet storm water pollution prevention requirements. It is anticipated that Aster Avenue, Larkspur Avenue, Jonquil Lane, 150th Place, 151st Place will be removed. Gladiola Avenue and Magnolia Drive will be removed, but it is yet to be determined if they will be removed in their entirety. There is no known proposed future use of the site following demolition at this time. The activity will be limited to existing hardscapes described above. Interim controls and mitigating measures will be put in place to ensure that the site is stabilized, maintained and secured pending future use. As mentioned before the site will be graded to meet storm water runoff requirements, topped with top soil and seeded. Under this selected scenario, a RAP will have to be prepared by ECHA and reviewed by EPA because it is a Superfund site. For additional information, see below, "Project Description, Purpose, Need, Objectives and Alternative Memorandum", "Project Description Addendum" and the HUD Form(s) 53245 that have been uploaded in this Section 4100 (Environmental Assessment Analysis) of this HEROS assessment under "Other Documentation".

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

If the ECHA does not demolish the property the West Calumet site will continue to be exposed to contamination until a new contamination clean-up plan is renegotiated with the EPA. If the ECHA does not demolish the property, the buildings will continue to deteriorate and it is unlikely ECHA will have the funds to remediate the contaminated property. As part of HUD's physical obsolescence test, HUD considers the cost of rehabilitation compared to the cost of new construction. Unless demolition occurs, ECHA will continue to spend available funds on basic maintenance and upkeep items, while attempting to mitigate harmful effects identified on the site and would unlikely be able to target bigger capital repairs of systems and components that are at the end of or already past their useful life. Due to the presence of contaminants, ECHA would not be allowed to spend any federal or non-federal funds on rehabilitation activities until the clean-up occurs. If no rehabilitation activities could occur, the property would continue to

physically deteriorate, making any future rehabilitation costlier and more complex. If rehabilitation is allowed to occur, and if the site is not demolished, the cost to substantially rehabilitate the buildings and remediate the site would cost more than building new. Due to the existing environmental conditions at the site and extensive media and public attention of these conditions, it is likely that the ECHA would face substantial marketing challenges and experience substantially reduced occupancy at the property as families will not want to move into the units. Reduced occupancy will, in the long-term, make it difficult to effectively manage and operate the development hindering the financial sustainability of the West Calumet development and ECHA operations.

**Summary of Findings and Conclusions:**

Potential impacts of the proposed demolition are beneficial overall to the environment and health and safety of users as well as the community at large. As part of the demolition the project site will be stabilized and protected in accordance with an ECHA and EPA agreed upon remedial action plan and oversight by the EPA as the Regulatory Agency for the NPL Site. Prior to any obligation allocation of Emergency Capital Funds, an the 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 needs to be completed and signed. 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.

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

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

| Law, Authority, or Factor          | Mitigation Measure or Condition  | Comments on Completed Measures | Complete |
|------------------------------------|--|--------------------------------|----------|
| Contamination and Toxic Substances | Engineering Controls and Remedial Action Plan reviewed by the EPA and as supplemented to in response to public comments. See, Section 5000 (Mitigation Measures and Conditions) for documentation and reports for these controls.      | N/A                            |          |
| Noise Abatement and Control        | This is a demolition only activity. Demolition activities are required to comply with existing local permitting requirements including any and all noise related conditions and noise mitigation provisions outlined on Page 15 of the | N/A                            |          |

|                                |   |     |  |
|--------------------------------|---|-----|--|
|                                | RAP. Once a future use of the project site is known, a new NEPA environmental review will be required for any future HUD assisted activities on the site. |     |  |
| Permits, reviews and approvals | All required local demolition permitting, reviews and approvals will be required at the time of demolition.   | N/A |  |

**Mitigation Plan**

Mitigation Plan Measures consist of Engineering and Site Controls, EPA reviewed Remedial Action Plan, with RAP conducted by the ECHA's third-party independent entity and as agreed to by the EPA. This EA and HUD's findings under Part 50 required mitigation measures be implemented in its determination that the site in its present condition was not suitable for residential use. that include: ECHA compliance with the terms and provisions of the final EPA reviewed demolition RAP finalized on April 13, 2017 and supplemented in response to public comments on September 15, 2017, the ECHA's Independent Third-Party Engineering Firms Environmental Monitoring of the demolition Project, the EPA Comfort Letter to the ECHA, and EPA agreed to monitoring of demolition activities, EPA Cost Estimates to monitor demolition activities, and an agreement between EPA and ECHA describing the oversight process and respective roles and responsibilities. This EA is for Demolition Only, with no known re-use. Once a future use is determined, a new NEPA environmental review will be required for any HUD assisted activities on the site.

[September 2017 RAP Supplement - Public Communication Plan - 17.1151.6\(1\).pdf](#)

[4-13-17 RAP Memorandum\(1\).pdf](#)

[4 13 17 RAP Appendix E - WMP.pdf](#)

[4 13 17 RAP Appendix D - AMSP.pdf](#)

[4 13 17 RAP Appendix C - ACM Survey\(1\).pdf](#)

[4 13 17 Appendix B - HASP \(1\).pdf](#)

[4 13 17 RAP Appendix A\(1\).pdf](#)

[4 13 17 Final Remedial Action Plan Demolition Monitoring Submission to EPA\(1\).pdf](#)

[East Chicago Remedial Stabilization Monitoring Plan Cost Estimate\(1\).pdf](#)

[4 27 17 EPA Letter to PHA on EPA Monitoring of Demolition Activities in Zone 1 USS Lead.pdf](#)

**Supporting documentation on completed measures**

## APPENDIX A: Related Federal Laws and Authorities

### Airport Hazards

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

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

**No**

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

**Yes**

### Screen Summary

#### **Compliance Determination**

The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements. Once future use of the site has been determined, this factor will need to be re-evaluated and/or a new environmental review completed for the then known future use activities on the project site. This EA 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.

#### **Supporting documentation**

[Airport Location MAPS IN 026 West Calumet DDA 0007571.pdf](#)

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

Yes

**No**

### Coastal Barrier Resources

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

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

#### Compliance Determination

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

#### Supporting documentation

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

Yes

✓ No

## Flood Insurance

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

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

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

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

Yes

### **Screen Summary**

#### **Compliance Determination**

Based on the project description the project includes no activities that would require further evaluation under this section. The project does not require flood insurance or is excepted from flood insurance. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with Flood Insurance requirements. The project will involve the demolition of the multi-family and non-dwelling structures associated with the West Calumet Public Housing development and there is no known future use nor any planned new construction being proposed on the project site at this time. The project area is located in Zone X, FEMA FIRM Map and Panel Numbers 0038E, 18089C0038E and 0126E, 18089C0126E. This EA 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. Current FEMA Maps will need to be re-evaluated at the time of any required subsequent environmental review. ADD UPDATED PHASE 1 CLEAN MAPS

#### **Supporting documentation**

[EC-WC Part 50 FloodPlain Management Maps and Partner Worksheet.pdf](#)  
[FEMA Floodplain MAPS \( Zone X \) IN 026 West Calumet DDA 0007571.pdf](#)

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

Yes

- ✓ No



**Air Quality**

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

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

Yes

✓ No

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

**Screen Summary**

**Compliance Determination**

Based on the project description, this project includes no activities that would require further evaluation under the Clean Air Act. The project is in compliance with the Clean Air Act. The project will involve the demolition of the improvements associated with the West Calumet Housing Public Housing Development and there is no known future use nor any planned new construction being proposed on the project site at this time. The Consultant provided final Asbestos Report dated 2/15/17 indicating certain materials will need to be removed and abated prior to the start of any demolition following all applicable, Local, State and Federal Law. Approval of this environmental review Part 50 for the demolition only activity is conditioned on the abatement identified in the Asbestos Report as well as any and all requirements outlined in the Remedial Action Plan for Demolition approved by the EPA. See Section 5000 (Mitigation Measures and Conditions) "Final RAP, Appendix C - ACM Survey dated April, 13, 2017" for applicable Asbestos RAP provisions. This EA 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.

**Supporting documentation**

[Asbestos Report IN 026 West Calumet AMP 3 DDA 000751.pdf](#)

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

Yes

No

### Coastal Zone Management Act

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

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

- Yes
- No

**2. Does this project include new construction, conversion, major rehabilitation, or substantial improvement activities?**

- Yes
- No

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

**Screen Summary**

**Compliance Determination**

Based on the project description the project does not include any activities that would affect a Coastal Zone. The project is in compliance with the Coastal Zone Management Act. Consultant indicated and HUD verified with State of Indiana Coastal Zone Manager that no Federal Consistency Review is required for the proposed demolition activity of the West Calumet Public Housing Development project site. Once future use of the site has been determined, the Indiana Coastal Zone Manager should be consulted for the yet to be determined future use activity on the project site to confirm and determine if a Federal Consistency Review is required. This EA 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.

**Supporting documentation**

[CZM Support Documents IN 026 West Calumet 0007571.pdf](#)

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

Yes

✓ No

## Contamination and Toxic Substances

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

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

- American Society for Testing and Materials (ASTM) Phase I Environmental Site Assessment (ESA)
- ASTM Phase II ESA
- Remediation or clean-up plan
- ASTM Vapor Encroachment Screening
- None of the Above

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

No

- Yes

**3. Mitigation**

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

**Can adverse environmental impacts be mitigated?**

Adverse environmental impacts cannot feasibly be mitigated.

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

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

Engineering Controls and Remedial Action Plan reviewed by the EPA and as supplemented to in response to public comments. See, Section 5000 (Mitigation Measures and Conditions) for documentation and reports for these controls.

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

Complete removal

Risk-based corrective action (RBCA)

**Screen Summary**

**Compliance Determination**

Site contamination was evaluated as follows: ASTM Phase I ESA, ASTM Phase II ESA (including a full Site Characterization) and ASTM Vapor Encroachment Screening. On-site or nearby toxic, hazardous, or radioactive substances were found that could affect the health and safety of project occupants or conflict with the intended use of the property in its current condition. The ASTM Phase I identified 9 REC's on the project site: (1) evidence of historic bulk petroleum storage onsite; (2) identified historic rail spurs identified onsite; (3) identified historic PCB containing equipment onsite; (4) identified historic bulk oil storage identified onsite (5) the known contamination of lead and arsenic in onsite soils; (6) identified historic metal refining and industrial operations identified on (south) adjoining site; (7) historic industrial operations and bulk oil storage identified on (southeast) adjoining site; (8) The USS Lead refinery superfund site at 5300 Kennedy Ave; and (9) evidence of vapor encroachment conditions on site. The ASTM Phase I, Phase II ESA's and a REC Location Map are uploaded and attached as support documentation in this Section. The adverse environmental impacts of the demolition-only activity can be mitigated. See, Section 5000 (Mitigation Measures and Conditions). With the mitigation being implemented and monitored, the demolition activity will be in compliance with contamination and toxic substances requirements. Approval of the EA for the demolition only activity is conditioned upon the specific terms identified in the Remedial Action Plan reviewed by the EPA for the project site as an identified NPL site. This EA 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.

**Supporting documentation**

[Segment 005 of Phase II Report - West Calumet Housing - 17.1151.2.pdf](#)  
[Segment 004 of Phase II Report - West Calumet Housing - 17.1151.2\(1\).pdf](#)  
[Segment 004 of Phase II Report - West Calumet Housing - 17.1151.2.pdf](#)  
[Segment 003 of Phase II Report - West Calumet Housing - 17.1151.2.pdf](#)  
[Segment 002 of Phase II Report - West Calumet Housing - 17.1151.2.pdf](#)  
[Segment 001 of Phase II Report - West Calumet Housing - 17.1151.2.pdf](#)  
[West Calumet Housing Authority E Chicago Phase 1 - 16.1151.2.2.pdf](#)  
[3 13 17 Draft Summary of Proposed EPA RAP by Section.pdf](#)  
[Location MAPS of RECs Identified WC-EC part 50.pdf](#)

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

Yes

No

## Endangered Species

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

**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.

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

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

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

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

- ✓ Yes, there are federally listed species or designated critical habitats present in the action area.

**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. in the action area.

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

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

**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 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. If negative effects cannot be mitigated, cancel the project using the button at the bottom of this screen.**

Mitigation as follows will be implemented:

✓ No mitigation is necessary.

Explain why mitigation will not be made here:

The proposed demolition only activity of the project site will not include disturbance of any identified federally listed threatened or endangered species or designated critical habitats. See, attached January 3, 2017 US Fish and Wildlife Service Letter. List to be updated every 90 days; Last verification of list completion 9/14/2017. See, attached 9/14/2017 scan below. Project Manager/ Engineer to continue to verify during course of the project.

Screen

Summary

#### **Compliance Determination**

This project has been determined to have No Effect on listed species. This project is in compliance with the Endangered Species Act without mitigation. This EA 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 including a review of potential adverse impacts to then known listed endangered or threatened species and known critical habitats.

**Supporting documentation**

[FWS IPaC Resource List 09.14.17 DOC.pdf](#)  
[US FWS End Species Doc WC IN 029 DDA 0007571.pdf](#)

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

Yes

✓ No

**Explosive and Flammable Hazards**

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

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

- No
- Yes

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

- No

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

Yes

**Screen Summary**

**Compliance Determination**

Based on the project description the project includes no activities that would require further evaluation under this section. The project is in compliance with explosive and flammable hazard requirements. AST's have been identified that are not within statutory/regulatory range from the Project Site. The Project will involve the demolition of the improvements associated with the West Calumet Public Housing Development and there is no known future use nor any planned new construction being proposed on the project site at this time. This EA is for demolition only. Once future use of the site is known, a new NEPA environmental review will be required for any future HUD assisted activities on the site.

**Supporting documentation**

[AST Locations Map IN 026 West Calumet DDA007571.pdf](#)

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

Yes

✓ No

## Farmlands Protection

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

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

Yes

No

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

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

### **Screen Summary**

#### **Compliance Determination**

This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is in compliance with the Farmland Protection Policy Act. Project is not located within Indiana Farmlands. Zoning for Project is Multi-Family Residential. The project will involve the demolition of the multi-family and non-dwelling structures associated with the West Calumet Public Housing Development and there is no known future use nor any planned new construction being proposed on the project site at this time. This EA 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.

#### **Supporting documentation**

[Farmland Land and Authority Source Doc- WC-EC Part 50.pdf](#)

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

Yes

No



## Floodplain Management

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

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

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

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

[FEMA MAPS EC-WC Part 50 FloodPlain Management Maps and Partner Worksheet.pdf](#)  
[FEMA Floodplain MAPS \( Zone X \) IN 026 West Calumet DDA 0007571.pdf](#)

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

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

- No

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

Yes

**Screen Summary**

**Compliance Determination**

This project does not occur in a floodplain. The project is in compliance with Executive Order 11988. Zone X, FEMA FIRM Map and Panel Numbers 0038E, 18089C0038E and 0126E, 18089C0126E. The project will involve the demolition of the multi-family and non-dwelling structures associated with the West Calumet Housing Complex and there is no known future use nor any planned new construction being proposed on the project site at this time. While the West Calumet Public Housing Development is not in a designated floodplain, the project is adjacent to a canal listed and designated by FEMA as Zone A. Demolition of the project site is conditioned upon such activities be completed and appropriate measures taken that will not disturb the adjacent Zone A. PHA contracts for demolition activities must contain provisions covering the avoidance of Zone A. This EA 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.

**Supporting documentation**

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

Yes

No

## Historic Preservation

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

### **Threshold**

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

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

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

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

### **Step 1 – Initiate Consultation**

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

- ✓ State Historic Preservation Offer (SHPO) Completed
- ✓ Indian Tribes, including Tribal Historic Preservation Officers (THPOs) or Native Hawaiian Organizations (NHOs)

Other Consulting Parties

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

1. HUD as R/E Submission of Request for Section 106 review to State of Indiana, Department of Natural Resources (INDNR) Historic Preservation Division; and 2. TDAT Tribal Directory- Lake County Indiana notified (Export of LAKE COUNTY INDIANA affected tribes attached in support documentation)

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

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

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

See Attached Bird's Eye Arial Maps that have been uploaded with Indiana SHPO Clearance Letter

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

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

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

**Additional Notes:**

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

Yes

✓ No

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

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

per guidance on direct and indirect effects.

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

✓ No Historic Properties Affected

Based on the response, the review is in compliance with this section. Document and upload concurrence(s) or objection(s) below.

**Document reason for finding:**

✓ No historic properties present.

Historic properties present, but project will have no effect upon them.

No Adverse Effect

Adverse Effect

**Screen Summary**

**Compliance Determination**

Based on Section 106 consultation there are No Historic Properties Affected because there are no historic properties present. The project is in compliance with Section 106. The project will involve the demolition of the multi-family and non-dwelling structures associated with the West Calumet Housing Complex and there is no known future use at this time at the project site at this time. The Indiana SHPO clearance provides that if during the course of the demolition activity any prehistoric or historic or archaeological artifacts or human remains are uncovered during construction, demolition, earthmoving activities, Indiana State Law requires that the discovery must be reported within two (2) business days to the Indiana Department of Natural Resources. Similarly, the consultation process with affected Indian Tribes and Tribal Historic Preservation Officers (THPO's) in Lake County, Indiana resulted responses to HUD as R/E that also requires that the demolition activity adhere to the Inadvertent Discovery Provisions provisions outlined under Indiana State Law (Indiana Code 14-21-1-27 and 29). PHA demolition contracts must contain provisions the will provide notice to the Indiana SHPO, Indian Tribes and THPO's if artifacts or remains are found and uncovered. This EA 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.

**Supporting documentation**

[Final SHPO Submission EC-IN Section 106 SHPO Submission \(s\) -Attachments and IN SHPO Response Letter.pdf](#)

[West Calumet-APE- MAPS -Section 106.pdf](#)

[TDAT- Export Lake County, Indiana.pdf](#)

[Tribal Response EC TDHO Forest Park Potawatami 1 20 2017.pdf](#)

[Tribal Response TDHO Miami of Oklahoma January 6, 2017.pdf](#)

[Section 106 Letter IN-DNR - DDA 0007571 ER Part 50.pdf](#)

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

Yes

✓ No

**Noise Abatement and Control**

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

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

New construction for residential use

Rehabilitation of an existing residential property

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

An interstate land sales registration

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

None of the above

**Screen Summary**

**Compliance Determination**

The project is in compliance with HUD's Noise regulation with mitigation. This is a demolition only activity. Demolition activities are required to comply with existing local permitting requirements including any and all noise related conditions and noise mitigation provisions outlined on Page 15 of the RAP. Once a future use of the project site is known, a new NEPA environmental review will be required for any future HUD assisted activities on the site.

**Supporting documentation**

[Noise Documents- Future Use- IN 026 West Calumet DDA 0007571.pdf](#)

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

Yes

No

## Sole Source Aquifers

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

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

Yes

✓ No

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

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

✓ No

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

Yes

### Screen Summary

#### **Compliance Determination**

The project is not located on a sole source aquifer area. The project is in compliance with Sole Source Aquifer requirements.

#### **Supporting documentation**

[Sole Source Aquifer MAP IN 026 West Calumet DDA0007571.pdf](#)

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

Yes

✓ No

## Wetlands Protection

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

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

No

✓ Yes

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

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

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

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

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

### Screen Summary

### **Compliance Determination**

The project will not impact on or off site wetlands. The project is in compliance with Executive Order 11990. The project will involve the demolition only of the multi-family and non-dwelling structures associated with the West Calumet Public Housing Development and there is no known future use nor any planned new construction being proposed on the project site at this time. While demolition activities will involve ground disturbance, the project is not located in a Wetland area. See, attached FWS-National Wetlands Inventory Map.

**Supporting documentation**

[Wetlands MAP- NW Inventory - IN 026 - West Calumet DDA 0007571.pdf](#)

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

Yes

✓ No

## Wild and Scenic Rivers Act

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

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

✓ No

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

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

### Screen Summary

#### **Compliance Determination**

This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act. Indiana has no nationally designated wild and scenic rivers (See Attachment 1 Support Documentation). The NPS has identified 1 Study River Segment located in Lake County, Indiana not within proximity of the project site. (See Attachment 2 Support Documentation). This EA 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.

#### **Supporting documentation**

[NPS Segmented Study Scenic Rivers Support Documentation # 2.pdf](#)  
[Scenic Rivers EA Support Documentation- 1.pdf](#)

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

Yes

✓ No

## Housing Requirements

| General requirements  | Legislation | Regulations                 |
|---|-------------|-----------------------------|
| Many Housing Programs have additional requirements beyond those listed at 50.4. Some of these relate to compliance with 50.3(i) and others relate to site nuisances and hazards |             | 24 CFR 50.3(i)<br>24 CFR 35 |

### **Hazardous Substances**

Requirements for evaluating additional housing requirements vary by program. Refer to the appropriate guidance for the program area (i.e, the Multifamily Accelerated Processing (MAP) guide, Chapter 7 of the Healthcare Mortgage Insurance Handbook, etc.) for specific requirements.

### **Lead-based paint**

**Was a lead-based paint inspection or survey performed by the appropriate certified lead professional?**

Yes

No, because the project was previously deemed to be lead free.

No, because the project does not involve any buildings constructed prior to 1978.

No, because program guidance does not require testing for this type of project  
For example: HUD's lead-based paint requirements at 24 CFR Part 35 do not apply to housing designated exclusively for the elderly or persons with disabilities, unless a child of less than 6 years of age resides or is expected to reside in such housing. In addition, the requirements do not apply to 0-bedroom dwelling units.

### **Radon**

**Was radon testing performed following the appropriate and latest ANSI-AARST standard?**

Yes

No, because program guidance does not require testing for this type of project.  
Note that radon testing is encouraged for all HUD projects, even where it is not required.

Explain why radon testing was not completed below.

**Asbestos**

**Was a comprehensive asbestos building survey performed pursuant to the relevant requirements of the latest ASTM standard?**

Yes

No, because the project does not involve any buildings constructed prior to 1978.  
Provide documentation of construction date(s) below.

No, because program guidance does not require testing for this type of project  
Explain in textbox below.

**Additional Nuisances and Hazards**

Many Housing Programs have additional requirements with respect to common nuisances and hazards. These include High Pressure Pipelines; Fall Hazards (High Voltage Transmission Lines and Support Structures); Oil or Gas Wells, Sour Gas Wells and Slush Pits; and Development planned on filled ground. There may also be additional regional or local requirements.

**Mitigation**

Describe all mitigation measures that will be taken for the Housing Requirements.

**Screen Summary**

**Compliance Determination**

**Supporting documentation**

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

**Environmental Justice**

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

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

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

- Yes
- No

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

- Yes
- No

**Explain:**

It is HUD policy that all properties used in HUD programs be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of the occupants or conflict with the intended utilization of the property. Demolition of the project site will not create [disproportionate] adverse environmental impacts upon a low-income or minority community. The proposed demolition is beneficial to the overall environment and health and safety of former resident as well as the community at large. The project is in compliance with Executive Order 12898. This EA if for demolition only and once the future use of the site is known, a new NEPA environmental review will be required for future any HUD assisted activities on the site.\* [ Demographics Site ]

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

upload any supporting documentation below.

**Screen Summary**

**Compliance Determination**

It is HUD policy that all properties used in HUD programs be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of the occupants or conflict with the intended utilization of the property. Demolition-only with no known future use of the project site will not create an adverse environmental impact that is disproportionate to a low-income or minority community. The proposed demolition and site stabilization are beneficial to the overall environment and health and safety of former residents as well as the community at large. The project is in compliance with Executive Order 12898. This EA 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.

**Supporting documentation**

[ejscreen SOE PDF.pdf](#)

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

Yes

✓ No