

FORM 2-6 INSTRUCTIONS

ENVIRONMENTAL ASSESSMENT CHECKLIST

For all CDBG projects subject to NEPA procedures, the Environmental Assessment Checklist is a valuable step in that analysis. Completion of this Checklist constitutes a quick yet well-documented review of environmental issues surrounding a specific project or group of projects and a decision as to how to proceed in further analysis.

Purpose

The major purpose of the Checklist is to allow a more detailed analysis to focus on those categories of potentially significant impact. This can avoid a lot of wasted energy in data collection, analysis and report writing for categories which have no potential for significant impact and require no mitigation efforts or ones for which the analyst has already done the work on previous projects. Assuming there is a file of solid environmental information about the community, the Checklist is intended to be filled out in a few hours - no more than a day even for projects with many potential effects. More time may be needed later for thorough analysis where the Checklist review indicates either potential impacts or where insufficient data is readily available. Judgments at this stage should be based upon available data with perhaps the addition of a few well-placed phone calls or a site visit if the area is unfamiliar to the analyst.

Organization

The Environmental Assessment Checklist covers seven major impact areas and 36 specific impact categories within those seven areas. The seven general areas represent categories with related and overlapping issues, shared data sources and similar requirements as to background for analysis. The presentation of a detailed list of 36 impact categories is provided to jog the memory of the reviewer, raise questions and assure that all potential impacts are considered. Note that some impact categories are also included on the Statutory Checklist. A project may be in compliance with the provisions of a specialized law, regulation or Executive Order and still have an impact. For example, a site for a residential use may not be subjected to unacceptable noise levels and, therefore, be in compliance. If, however, the site will be used for an activity which will produce high levels of noise (short or long term), this may have an impact on the surrounding area and should be considered when completing the Environmental Assessment Checklist. If, however, it is determined that the subject has been covered adequately on the Statutory Checklist, this should be noted in the space provided for documentation, and no further analysis is required for that environmental factor.

How to Complete

For each impact category the local environmental analyst is asked to check the appropriate box relating to potential impacts, needed study, and mitigation or modification. In many cases more than one box could or should be checked. In each case a source should be cited which may be a report, phone contact, previous ERR, field observation or general knowledge of the area. The Environmental Assessment Guidance Questions, presented on the following page, provide key

assessment questions and data sources that are a valuable reference in completing this Checklist. The determinations to be made for each impact category include:

- **No Impact Anticipated (Column 1)** – A checkmark here indicates no more analysis or mitigation effort is needed. Clear and specific documentation is essential, referencing the factual conditions or specific circumstances that support the finding. Mere conclusions are not sufficient.
- **Potentially Beneficial (Column 2)** – Beneficial impacts should be indicated here. Notations supporting that finding can be attached. A more detailed analysis is not necessary.
- **Potentially Adverse/Requires Documentation (Column 3)** – In some cases, this quick review may be all that is needed to evaluate impacts. They may be as small as to require no more study; they may be construction effects only for which standard mitigation procedures have been established; or they may have been analyzed for previous assessments in a fully comparable situation. Documentation here is particularly important and will require attached notes outlining sources explaining the factual basis of the impact finding and describing any mitigation efforts.
- **Potentially Adverse/Requires More Study (Column 4)** – If this is checked, the impact category in question will be subject to further review (site visits, detailed review of data, consultation with experts, etc.) using techniques such as those described in Appendix A. The points to remember are that (1) only those categories with a check in this box need be subject to a detailed assessment and (2) this is not a decision about EIS preparation but a decision to investigate further.
- **Needs Mitigation (Column 5)** – This column should be used in combination with the third and fourth columns indicating some type of potential adverse impact. In some cases specific measures to reduce adverse effects on a community cannot be discussed in full detail right away. Instead, such measures are subject to review and development and implementation responsibility as part of a more detailed analysis which follows. In other cases mitigation measures may be known and recorded. Mitigation measures or safeguards should be listed for easy reference on page 4 of the Checklist.
- **Requires Project Modification (Column 6)** – Early project review affords a special opportunity to identify needed changes in the project itself before final applications are made or programs finalized. Often such changes can eliminate the need for further analysis by eliminating the source of the problem. It is also possible that changes (such as moving a project to a different site outside a high noise zone, or combining it with a new project to provide needed sewer or water lines) could be identified at this time.

In addition to these early decisions as to potential impact or mitigation needs, the Checklist calls for sources or contacts to be identified which have contributed to the decision in a specific impact category (Column 7). This may be done in the space provided or more likely by reference to attached notes which indicate sources or contacts and describe considerations made. On pages 5 and 6 of the Checklist, the analyst is asked to look back over the individual decisions made and draw some conclusions for further action. This includes a listing of project modifications, impact categories requiring more study and mitigation efforts needed.

Based on the conclusions of the environmental assessment, on the last page of the Checklist, the preparer will state his or her finding as to whether or not the request for release of funds for the project will constitute an action significantly affecting the quality of the human environment.

ENVIRONMENTAL ASSESSMENT GUIDANCE QUESTIONS

CONFORMANCE WITH COMPREHENSIVE PLANS AND ZONING

- Is the proposal consistent with completed components of the local or regional comprehensive plan, whether adopted or in draft stage? Is there a relevant state plan and is the proposal consistent?
- Is the proposed project consistent with other plans including those prepared by area wide planning agencies, special districts and boards, and State agencies in various functional areas?
- Is the proposed project consistent with adopted community or area wide policies and goals?
- Does the proposed project comply with existing zoning, land use, and subdivision regulations? If not, does the proposal require a zoning or land use variance?

LAND USE COMPATIBILITY

- What are the existing land uses adjacent to the proposed project? Do the abutters and neighbors think the proposed project will be incompatible with existing uses?
- Will the project have an adverse effect on the economy of a core city area? Will it contribute to urban sprawl? Will it displace economic activity from a central business district?
- Will the proposed project induce development which will alter existing land use or which will be incompatible with the existing scale and density of development? Are the changes which will result from any induced development regarded by the community as beneficial or negative?
- Does the proposed project contribute to reducing the racial, ethnic and income segregation of the area's housing?

SLOPE

- Does the proposal call for development on a steep slope, and, if so, does its design plan include measures to overcome potential erosion, slope stability and runoff problems?
- Does the county, local, or site-specific soil survey mention that slopes are unstable for any of the soils on the site?

- Is there a history of slope failure in the project area environs?
- Is there visual indication of previous slides or slumps in the project area, such as cracked walls or tilted trees or fences?

EROSION

- Does the project involve development of an erosion sensitive area (near water, on a steep slope, on a sandy or silty soil)? If so, is erosion control included as part of the plan?
- Does the proposed project create slopes by cut and fill?
- Does site clearance require vegetation removal? How many acres will be cleared and for how long?
- Is there evidence of erosion or sedimentation?

SOIL SUITABILITY

- Is there any visible evidence of soil problems (i.e., foundation cracking or settling, basement flooding, etc.) in the neighborhood of the project site?
- Have soil borings been made for the area? Do they indicate marginal or unsatisfactory soil conditions?
- If the answer to either of the above questions is yes and the proposed project involves either new construction or very substantial rehabilitation activities, does the project design include appropriate mitigation measures to address the problem of poor soil conditions?

HAZARDS, NUISANCES, AND SITE SAFETY

- Does the project involve potential hazards, such as: potential public health and safety problems: noise, odor, vibration, lack of light, air pollution, toxic chemical dumps, uranium mill tailings, reclaimed phosphate land (radioactive) site hazards: shadows, inadequate street lighting, uncontrolled access to lakes and streams, improperly screened drains or catchment areas, steep stairs or walks, overgrown brush, hazardous waste dumps, facilities handling chemicals and/or petrochemicals of an explosive or fire prone nature traffic: circulation conflicts, road safety, exposure to radiation or toxic substances natural hazards: wind, droughts, floods, lightning, hurricanes, tornadoes; erosion, landslides, volcanoes, earthquakes; infestations, allergies, bacterial, viral and fungal diseases

- Does the project involve any other potential hazards not listed that are created by project construction, operation, and design as well as those existing on and near the site?
- Are there project users or neighboring populations whose special health and safety needs are not anticipated in the project design?
- Have actions been taken to protect children from attractive nuisances? Have measures been taken to reduce the potential risk to the elderly from dust and temporary walkways and traffic around construction sites?

AIRPORTS

- Is there a military airfield or commercial service airport in the vicinity of the proposed project site?
- If yes, is the project site located in Runway Clear Zone (civil airports) or is it located in the Clear Zone or Accident Potential Zone (military airfields)?

ENERGY

- Does the location of the site have any special energy related advantages or disadvantages? Can these be maximized or overcome?
- Have the architectural plans taken full advantage of potential energy saving measures, such as insulation, window design and placement, lighting, heating, cooling, and hot water systems?
- Are energy saving measures in conformance with HUD Minimum Property Standards and other applicable energy saving codes?
- Is the location of the project in close proximity to transit, shopping, services, and employment locations?

NOISE CONTRIBUTION

- Based on existing ambient noise and estimated future noise levels, is the site appropriate for the proposed activities and facilities?
- Will the project expose or be exposed to noise levels which exceed local, state, or HUD noise standards?

- If there is a potential noise problem, what kinds of mitigating measures are proposed for the project?

AIR QUALITY

- Does the project require an installation permit, operating permit, or indirect source permit under local pollution control agency rules? If so, have permit requirements been satisfied?
- Is the project located in the vicinity of a monitoring station where air quality violations have been registered? If so, will the project exacerbate air-quality problems in the area?
- Has the project been designed to mitigate possible adverse effects if the project or its potential users would be particularly sensitive to existing air pollution levels, or those expected 10 to 20 years hence?
- Will the proposal establish a trend that will lead to violation of air quality standards in the future? If so, what project changes could be made or what mitigation measures could be established?
- Will the proposed project have parking facilities for 1,000 cars in an SMSA or 2,000 cars outside an SMSA or generate traffic of a corresponding magnitude?

VISUAL QUALITY

- Will there be physical alteration or destruction of the natural or man-made-environment (clearance of trees or buildings; substantial alteration of vegetative character or land surface elevations; etc.)? What is the extent of alteration or destruction? Will the project restore or improve areas already disrupted by man, such as removing inappropriate drainage ways, redirecting surface water away from streams or ponds, or restore wetlands?
- Will there be intrusion of elements out of character or scale with existing physical environment? Are proposed signs, street furniture, and buildings in character with the existing architectural styles, particularly in historic areas?
- Does a proposed building represent a significant change in size, scale, placement, or height in relation to neighboring structures? Is the change inappropriate structurally or functionally (i.e., unrelated size or spacing of windows, floor levels, entrance patterns, etc.)?

- Will a proposed structure block or degrade views, change the skyline, or create a new focal point? Do loading docks, trash collectors, parking, etc. present objectionable visual pollution introduced either directly or indirectly due to loading docks, trash collectors, parking? Is this mitigated visually?
- Will there be interference with or impairment of capacity to have a positive experience of natural conditions (inhibitors include increased pollution, noise, vibration, dust, odor, heat, and glare)? Will these interfere with human health? Will increases promote the deterioration of vegetation, wildlife habitats, and historic buildings)?

HISTORICAL, CULTURAL, AND ARCHAEOLOGICAL

- Has a survey of local historic properties been conducted or does the locality have an inventory of historic places? Is there a local commission that can provide historic information?
- What information on the project area does the State Historic Preservation Office (SHPO) have? Does the project area and environs include properties listed on the National Register of Historic Places?
- Are there non-listed properties that appear to be historic? If so, consultation with the SHPO must be made regarding eligibility for inclusion in the National Register. (Note: Document consultations with the SHPO regarding National Register eligibility.)
- Has the Department of the Interior been contacted about eligibility of properties the community or SHPO consider eligible for listing and affected by the project?
- Has the SHPO indicated a Memorandum of Agreement is needed to avoid or reduce affects? If yes, has the Section 106 process been completed?
- Is consultation with the Advisory Council on Historic Preservation necessary for this project? If so, what was concluded?

DEMOGRAPHIC/COMMUNITY CHARACTER

- Are levels of activity reduced or increased? Are changes detrimental?
- What identifiable neighborhoods/communities are within the sphere of influence or likely impact of the project? What characteristics or identifiable factors help define the character of these communities or neighborhoods?

- Will the project result in physical barriers or difficult access which will isolate a particular neighborhood or population group making access to local services, facilities, and institutions or other parts of the city more difficult?
- Will the proposed project severely alter residential, commercial, or industrial uses?
- Will the proposed project destroy or harm any community institution, such as a neighborhood church?

DISPLACEMENT

- Will the project directly displace individuals or families? If yes, how many persons?
- Is the displacement covered by the Uniform Relocation Act, and are funds available for payment?
- Will the project destroy or relocate existing jobs, community facilities, or any business establishments? Is the displacement covered by The Act, and are funds available for payments?
- Will identifiable groups be affected, such as older persons, females, single-parent families, racial/ethnic, income, or minority group members?
- Are replacement facilities or housing units available within the community or in nearby neighborhoods? What will be the effect of relocation on these neighborhoods?
- Will the project result in probable indirect displacement? If so, have measures been planned to alleviate the hardship on those affected whose displacement is not covered by The Act?

EMPLOYMENT AND INCOME PATTERNS

- Will the project either significantly increase or decrease employment opportunities? Will it create conditions favorable or unfavorable to commercial, industrial, or institutional operation or development?
- How many temporary and how many permanent jobs will be created by the project?
- What is the profile of new jobs created by the project? What is the distribution across the skills and income scale? How do these relate to the skills and income profile of project area residents?

- Will the new jobs likely go to area residents, to lower income, unemployed and minority group members? Will construction jobs likely go to union or nonunion workers?
- Where are the new employees likely to come from?

EDUCATIONAL FACILITIES

- Will the additional school-age children exceed the capacity of existing or planned school facilities?
- Do the potentially affected schools have adequate and safe access facilities? Are these adequate both in terms of safety and access?
- Will additional or alternative facilities have to be provided to ensure safety and suitable access?

COMMERCIAL FACILITIES

- Is there adequate and convenient access to retail services? (In the case of elderly, this means that shopping for food, medicine, other essentials, is within three blocks and services such as banks are within walking distance.)
- Do local retail services meet the needs of project occupants/users? Are they affordable, and is the range of services adequate?
- Will existing retail and commercial services be adversely impacted by the proposed project? Will existing businesses be placed at a competitive disadvantage or be displaced?

HEALTH CARE

- Are non-emergency, health-care services located within a reasonable proximity to the proposed project, i.e., less than a half-hour's drive or commute away?
- Is emergency health service available within approximately three to five minutes?
- Can ambulance trips to a hospital or other health care center be made within 10 to 15 minutes?
- Is the number of professional/skilled medical staff in a realistic proportion to any increase in residents/users?

- Will project residents/users require special medical services or skills such as geriatric clinics?

SOCIAL SERVICES

- Are social services currently located in close proximity to the prospective users/residents? Are they within walking distance or convenient to public transportation and less than one-half hour's commute?
- Is the number of professional/trained staff in realistic proportion to the anticipated increase in residents/users? Could ready provision for additional skilled staff be made?
- Will demand for social services increase and overburden existing facilities? Can provision be made to obtain alternative and/or additional space?

SOLID WASTE

- Will the existing or planned solid waste disposal system adequately service the proposed development?
- As a result of the project, will the design capacity of these facilities be exceeded?
- Will the proposed project be adversely affected by proximity to these facilities?
- Does the community have an adequate number of vehicles to provide the project with collection service?
- Will the residents/users of the proposed project have to pay annual/monthly costs for these services? Will these costs create severe financial hardships for project residents?

WASTE WATER

- Will the existing or planned waste water systems adequately service the proposed development?
- As a result of the project, will the design capacity of wastewater treatment systems be exceeded?
- Will the proposed project area be adversely affected by proximity to these systems?

In less developed or undeveloped areas, are soils suitable for on-site wastewater disposal such as septic systems?

Where on-site disposal is necessary, will the Local Plumbing Inspector issue a permit?

STORM WATER

Will existing or planned storm water disposal and treatment systems adequately service the proposed development?

Will the project overload the design capacity of these facilities?

Will the proposed project be adversely affected by proximity to these facilities?

WATER SUPPLY

If on-site water is supplied through a public water system, has prior approval been given for public water system construction and operation, including supply for this project?

Will either the municipal water utility or on-site water supply system be adequate to serve the proposed project?

Is the quality of water supply safe from a chemical and bacteriological standpoint?

Will the project affect a sole source or other aquifer?

PUBLIC SAFETY

Does the project location provide adequate access to police, fire, and emergency medical services?

Are there or will there be obstacles to access (i.e., one-way roads, narrow bridges, waterways, expressways, railroads, etc.) which would prohibit access in an emergency situation? Does project design provide easy access for individuals and emergency vehicles?

Are police and fire protection services available and adequate to meet project needs?

Does the area have a particularly high crime rate? Are there special plans for a security system which have been approved by the police department?

- Is the design and/or architectural configuration of the development such that it is easily patrolled by police from the street?
- Will manpower/equipment burdens be faced by existing facilities? Can services be expanded or provided for the project? Can the project provide services, such as in-house security?

OPEN SPACE, RECREATION, AND CULTURAL FACILITIES

- Are open space, recreational, and cultural facilities within reasonable proximity (within walking distance) to the project area?
- Is adequate public transportation available from the project to these facilities?
- Is there an adequate supply of these resources for the users or the resident population of the development?
- Will CDBG project cause any overloading of existing facilities?
- Can the special needs of certain population groups, such as small children, handicapped, or elderly persons, be provided for through the project?
- Are there lots for very small children, playgrounds for elementary school children, drop-in centers for senior citizens, etc.?
- If the development is housing, has space for informal play for children of all ages been included on-site? Have recreational areas for adults and the elderly been provided, including places for passive recreation?

TRANSPORTATION

- Will transportation facilities and services be adequate to meet the needs of the project's users? Is off-street parking available and adequate? Is adequate public transportation available?
- Are there special transportation issues (programs for the elderly and handicapped, bridge clearances for trucks, emergency vehicle access) which have not been adequately provided for?
- Will the project serve to reduce the mobility of any group?

- Will the project encourage additional private vehicle trips and increase energy consumption?
- Will the users of the project be encouraged to use both auto and public transit?
- Have curbs been designed with wheelchair ramps, pedestrian activated signal lights, etc., where needed? Have pedestrian overpasses been included in plans where needed?
- Is traffic light timing adequate for elderly pedestrians?
- Will the project create any safety hazards?
- Will the project be provided with an adequate level of transportation service? Will it overload existing or proposed transportation services; or, conversely, create a situation whereby facilities are seriously underused?
- Have special parking spaces been designated for exclusive use by the handicapped?

WATER RESOURCES

- Is the site subject to rapid water withdrawal problems which change the depth or character of the water table, affect water supply, and /or area vegetation?
- Will the project use groundwater for its water supply? Are there a large number of wells or wells that pump large quantities of water from the water table near the proposed project site?
- Will a lowered water table require deep pumping for water?
- Are septic systems being used?
- Is there a large variance in the water table elevation? (Note: a high seasonal water table can prevent proper functioning of septic tank drain fields.)
- Have septic disposal systems been properly designed, installed, and maintained to prevent effluent from contaminating groundwater supplies?
- Is there impact on a sole source aquifer?
- Are there visual or other indications of water quality problems on or near the site?

- Will the project involve discharge of sewage effluent into surface water bodies? If so, will it meet State, Federal, and other applicable standards?
- Will the project involve a substantial increase in impervious surface area, and, if so, have runoff control measures been included in the design?
- Will the project affect surface water flows or water levels in ponds as a result of excessive ground water well pumping?

FLOODPLAIN MANAGEMENT

- Will the project be located in the 100-year floodplain, change the 100-year floodplain, or affect the floodway?
- Is the project required to be in the floodplain?
- Are there available alternatives to locating the proposed project or activity in the floodplain?
- Is the proposed project in compliance with Executive Order 11988, NFIP regulations, and the local Floodplain Management Ordinance?
- Is the proposed project or activity subject to compliance with the Federally approved State Coastal Zone Management Plans?
- Is the proposed project or activity in compliance with conditions set forth by the U.S. Army Corps of Engineers concerning permits for dredge and fill activity?

WETLANDS PROTECTION

- Does the proposed CDBG project have the potential to affect or be affected by a wetland?
- Is the project in compliance with Executive Order 11990?
- Are there available alternatives to locating the project or activity in the wetland?
- Is the proposed project or activity subject to compliance with Federally approved State Coastal Zone Management Plans?
- Is the proposed project or activity in compliance with conditions set forth by the U.S. Army Corps of Engineers concerning permits for dredge and fill activity?

COASTAL ZONE MANAGEMENT

- Does the State have an approved Coastal Zone Management Plan?
- Does the proposed project directly affect the coastal zone? If so, is it consistent with the approved plan?

UNIQUE NATURAL FEATURES

- Will the proposed project location, construction, or activities of project users adversely impact unique natural features on or near the site?
- Will the project either destroy or isolate from public or scientific access any unique natural feature or features on or near the site?
- Will the unique natural feature pose safety hazards for a proposed development?

AGRICULTURAL LANDS

- Will the proposed project be located on or directly adjacent to land that is categorized as prime, unique, or of State or local importance?
- Will drainage from the project adversely affect farmland?
- Will the project location, construction, or activities of project users adversely affect important and productive farmlands on or near the site by conversion?
- Will the project create problems by introducing nuisance species of vegetation which may spread to adjacent farmland?

VEGETATION AND ANIMAL LIFE

- Will the project damage or destroy existing remnant plant communities, especially rare or endangered species?
- Will it damage or destroy trees without replacement and landscaping?
- Will the project create environmental conditions which might threaten the survival of existing vegetation, particularly changes in the native plant community habitats?
- Will it create conditions favorable to nuisance species?

- Will the project create special hazards for animal life? What types of animals will be affected and how will they be affected?
- Will the project damage or destroy existing wildlife habitats?
- Will the project threaten any animal species listed by either state or Federal agencies as rare or endangered?
- Will the project damage game fish habitats or spawning grounds?
- Will the project create conditions favorable to the proliferation of pest species?
- Will excessive grading alter the groundwater level and thus cause the slow death of trees and ground cover which in turn destroys animal habitat.