



March 6, 2019

Mississippi Region VI RAD, LP  
192 Bastille Lane  
Ruston, LA 71270

**Attention:** Jennifer Croxton

**Subject:** Phase I Environmental Site Assessment  
101 King Ranch Circle  
Canton, Mississippi 39046  
Spectrum Project No. 2735-147-01

Dear Ms. Croxton:

Spectrum Environmental, Inc., (Spectrum) is pleased to provide this Phase I Environmental Site Assessment (Phase I ESA) Report prepared for the above-referenced property.

Please be aware that according to ASTM Practice E1527-13, this document is generally valid for 180 days, unless changes in site usage have occurred which would impact the environmental conditions of the property. If you have any questions or comments, please contact the undersigned at (205) 664-2000.

Sincerely,  
SPECTRUM ENVIRONMENTAL, INC.

**IN PROGRESS**

Staff Geologist

**IN PROGRESS**

Jamie D. Cox, P.G.  
Division Manager

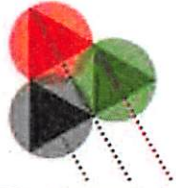
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# SPECTRUM

Solutions to Your Environmental Challenges

**Phase I Environmental Site Assessment Report  
Sam Estess Estates  
101 King Ranch Circle  
Canton, Mississippi 39046**

Prepared For:

Mississippi Region VI RAD, LP  
192 Bastille Lane  
Ruston, LA 1270

Report Issuance Date: March 6, 2019

Spectrum Project Number:  
2735-147-01

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**ACRONYMS**

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**STANDARD ENVIRONMENTAL RECORDS**

***Federal NPL site list***

NPL National Priority List  
Proposed NPL Proposed National Priority List Sites  
NPL LIENS Federal Superfund Liens

***Federal Delisted NPL site list***

Delisted NPL National Priority List Deletions

***Federal CERCLIS list***

CERCLIS Comprehensive Environmental Response, Compensation, and Liability  
Information System  
FEDERAL FACILITY Federal Facility Site Information listing

***Federal RCRA CORRACTS facilities list***

CORRACTS Corrective Action Report

***Federal RCRA non-CORRACTS TSD facilities list***

RCRA-TSDF RCRA - Treatment, Storage and Disposal

***Federal institutional controls / engineering controls registries***

US ENG CONTROLS Engineering Controls Sites List  
US INST CONTROL Sites with Institutional Controls

***State and tribal landfill and/or solid waste disposal site lists***

SWF/LF Permitted Landfills

***State and tribal leaking storage tank lists***

LAST List of AST Release Incidents  
INDIAN LUST Leaking Underground Storage Tanks on Indian Land

***State and tribal registered storage tank lists***

INDIAN UST Underground Storage Tanks on Indian Land  
FEMA UST Underground Storage Tank Listing

***State and tribal institutional control / engineering control registries***

ENG CONTROLS Engineering Controls Site Listing  
AUL Environmental Covenants

***State and tribal voluntary cleanup sites***

INDIAN VCP Voluntary Cleanup Priority Listing

***State and tribal Brownfields sites***

BROWNFIELDS Land Division Brownfields 128(a) Program Site Listing

**ADDITIONAL ENVIRONMENTAL RECORDS**

***Local Brownfield lists***

US BROWNFIELDS A Listing of Brownfields Sites

***Local Lists of Landfill / Solid Waste Disposal Sites***

ODI Open Dump Inventory  
DEBRIS REGION 9 Torres Martinez Reservation Illegal Dump Site Locations  
INDIAN ODI Report on the Status of Open Dumps on Indian Lands

***Local Lists of Hazardous waste / Contaminated Sites***

US CDL Clandestine Drug Labs  
AOCONCERN Area of Concern  
CDL Clandestine Methamphetamine Lab Sites  
US HIST CDL National Clandestine Laboratory Register

***Local Land Records***

LIENS 2 CERCLA Lien Information  
LUCIS Land Use Control Information System

***Records of Emergency Release Reports***

HMIRS Hazardous Materials Information Reporting System  
SPILLS Emergency Response Data

***Other Ascertainable Records***

COAL ASH Coal Ash Disposal Sites  
COAL ASH DOE STEAM-ELECTRIC PLANT OPERATION DATA  
COAL ASH EPA Coal Combustion Residues Surface Impoundments List  
CONSENT Superfund (CERCLA) Consent Decrees  
DOT OPS Incident and Accident Data  
DOD Department of Defense Sites  
DRYCLEANERS Drycleaner Facility Listing  
FUDS Formerly Used Defense Sites  
FTTS FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide,  
& Rodenticide Act)/TSCA (Toxic Substances Control Act)  
HIST FTTS FIFRA/TSCA Tracking System Administrative Case Listing  
ICIS Integrated Compliance Information System  
INDIAN RESERV Indian Reservations  
MINES Mines Master Index File  
MLTS Material Licensing Tracking System  
PADS PCB Activity Database System  
PCB TRANSFORMER PCB Transformer Registration Database  
RAATS RCRA Administrative Action Tracking System  
RADINFO Radiation Information Database  
ROD Records Of Decision  
SCRD DRYCLEANERS State Coalition for Remediation of Drycleaners Listing  
SSTS Section 7 Tracking Systems  
TRIS Toxic Chemical Release Inventory System  
TSCA Toxic Substances Control Act  
UMTRA Uranium Mill Tailings Sites

## 1.0 EXECUTIVE SUMMARY

---

Gill|Spectrum Environmental, Inc. has prepared this Phase I Environmental Site Assessment (Phase I ESA) report Sam Estess Estates located at 131 King Ranch Circle in Canton, Mississippi in accordance with American Society of Testing and Materials (ASTM) Practice E 1527-13, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, which is recognized by the United States Environmental Protection Agency (USEPA) and deemed to be compliant with the All Appropriate Inquiries (AAI) Regulation listed under 40 CFR Part 312. This Phase I ESA was requested as part of a Rental Assistance Demonstration (RAD) Project-Based Vouchers (PBV) loan conversion. Based on our review of the Environmental Review Requirements for First Component RAD Conversions, dated February 29, 2016, Non-FHA PBV transactions are required to submit a Phase I ESA in accordance with ASTM E 1527-13 and comply with Chapter 9 of the Multifamily Accelerated Processing (MAP) Guide and HUD Part 58.

The objective of this Phase I ESA was to identify, to the extent feasible *recognized environmental conditions*<sup>1</sup> (REC) and/or *business environmental risks*<sup>2</sup> (BER) in association with the property, if any. To accomplish this objective, Gill|Spectrum conducted a review of reasonably ascertainable<sup>3</sup> records (and practically reviewable<sup>4</sup>), conducted a site reconnaissance, conducted interviews of persons knowledgeable of the site/surrounding areas, and evaluated the data for reporting.

### 1.1 Property Summary Table

A summary of the pertinent details of the project is provided below.

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<sup>1</sup> *Recognized Environmental Condition* - "The presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment".

<sup>2</sup> *Business Environmental Risk* - A risk which can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of a parcel of *commercial real estate*, not necessarily limited to those environmental issues required to be investigated in this practice.

<sup>3</sup> Reasonably ascertainable - Information that is: (1) publicly available, (2) obtainable from its source within reasonable time and cost constraints, and (3) practically reviewable.

<sup>4</sup> Practically Reviewable - Means that information provided by source in a manner and in a form that, upon examination, yields information relevant to the property without the need for extraordinary analysis of irrelevant data.

Project Summary Table					
Name of Client:	Mississippi Region VI, LP			Project Number:	2735-147-01
Client Contact:	Jennifer Croxton				
Project Description:	Phase I ESA				
Property Name:	Sam Estess Estates				
Property Address:	131 King Ranch Circle				
City:	Canton	County:	Madison	State:	MS
Tax Map Designation:	092F13B001/02.00				
Property Area (Acres):	±10.68				
Building Area (Square Feet):	NA				
Assessor Designated Site Use:	Single Family Residential				
Year Built:	NA				
Property Owner:	US Department of Housing				
Assessment Personnel:	Thornton Turner				
Accompanied/Escorted By:	Michael Clopton				
Property Contact:	Michael Clopton				
Inspection Date:	February 14, 2019				
Weather Conditions:	Cloudy and warm				

## 1.2 Conclusions

Gill|Spectrum has performed a Phase I Environmental Site Assessment in accordance with the scope and limitations of ASTM Practice E 1527-13 of the target property. A summary of the findings is presented below.

### *Recognized Environmental Conditions*

A recognized environmental condition (REC), as defined in the ASTM Standard, means the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. De minimis conditions are not REC's. *Based on our review of current and historical site data, no RECs were identified in connection with the target property.*

### *Historical Recognized Environmental Conditions*

A historical recognized environmental condition (HREC), as defined in the ASTM Standard, is an environmental condition that in the past would have been identified as a REC, but has been adequately addressed and therefore no longer represents a REC. *Based on our review of current and historical site data, no HRECs were identified in connection with the target property.*



***Controlled Recognized Environmental Conditions***

A controlled recognized environmental condition (CREC), as defined in the ASTM Standard, is a REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent or meeting risk-based criteria established by the regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls). *Based on our review of current and historical site data, no CRECs were identified in connection with the target property.*

***Business Environmental Risks***

A business environmental risk (BER), as defined in the ASTM Standard, is a risk which can have a material environmental or environmentally driven impact on the business associated with the current or planned use of a parcel of commercial real estate, not necessarily limited to those environmental issues required to be investigated in this practice. *Based on our review of current and historical site data, no BERs were identified in connection with the target property.*

**1.3 Table of Critical Dates**

Table of Critical Dates	
Report Issuance Date	March 6, 2019
Date of Interview of Past and Present Owners and Occupants	February 13, 2019
Date of Recorded Environmental Clean-up Lien Search	-
Date of Government Record Review	February 5, 2019
Date of Visual Inspection of Subject and Adjoining Properties	February 14, 2019
Earliest Date of Interviews, Lien Search, Records Reviews and Inspections	February 5, 2019

It should be noted that this section is only intended to represent a brief summary of our findings, and is not a detailed account of all the information compiled in preparation of this report. The user should review the Phase I ESA in its entirety prior to drawing any final conclusions as to potential environmental conditions associated with the site.

## 2.0 INTRODUCTION

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### 2.1 Purpose

The purpose of this Phase I Environmental Site Assessment (Phase I ESA) is to identify, to the extent feasible pursuant to the processes prescribed in the ASTM, E1527-13 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, *recognized environmental conditions* (RECs) in connection with the property. The term REC means “the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment”. De minimis conditions are not recognized environmental conditions. De minimis conditions generally do not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

The Phase I ESA Process is intended to permit a *user* to satisfy one of the requirements to qualify for the *innocent landowner*<sup>5</sup>, *contiguous property owner*<sup>6</sup>, or *bona fide prospective purchaser*<sup>7</sup> limitations on CERCLA liability (*landowner liability protections*).

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<sup>5</sup> Innocent Landowner Defense: A person may qualify as one of three types of innocent landowners: (i) a person who “did not know and had no reason to know” that contamination existed on the property at the time the purchaser acquired the property; (ii) a government entity which acquired the property by escheat, or through any other involuntary transfer or acquisition, or through the exercise of eminent domain authority by purchase or condemnation; and (iii) a person who “acquired the facility by inheritance or bequest.” To qualify for the innocent landowner defense, such person must have made all appropriate inquiries on or before the date of purchase. Furthermore, the all appropriate inquiries must not have resulted in knowledge of the contamination. If it does, then such person did “know” or “had reason to know” of contamination and would not be eligible for the innocent landowner defense.

<sup>6</sup> Contiguous Property Owner Liability Protection: A person may qualify for the contiguous property owner liability protection if, among other requirements, such person owns real property that is contiguous to, and that is or may be contaminated by hazardous substances from other real property that is not owned by that person. Furthermore, such person conducted All Appropriate Inquiry at the time of acquisition of the property and did not know or have reason to know that the property was, or could be, contaminated by a release or threatened release from the contiguous property. The all appropriate inquiries must not result in knowledge of contamination. If it does, then such person did “know” or “had reason to know” of contamination and would not be eligible for the contiguous property owner liability protection.

<sup>7</sup> Bona fide prospective purchaser liability protection: A person may qualify as a bona fide prospective purchaser if, among other requirements, such person made “all appropriate inquiries into the previous ownership and uses of the facility in accordance with generally accepted good commercial and customary standards and practices.” Knowledge of contamination resulting from all appropriate inquiry would not generally preclude this liability protection. A person must make all appropriate inquiry on or before the date of purchase and the facility must have been purchased after January 11, 2002.

## 2.2 Detailed Scope of Services

Gill|Spectrum employs a phased approach to site investigations by outlining and completing specific work tasks. A Phase I ESA usually consists of a records review, site reconnaissance, personal interviews, and the generation of a report. Results of the initial Phase I ESA help assess whether further investigations may be necessary.

### 2.2.1 Records Review

The purpose of the records review is to obtain and review records that will help identify RECs in connection with the property. Accuracy and completeness of record information varies among information sources, including governmental sources. Record information is often inaccurate or incomplete. The user or environmental professional is not obligated to identify mistakes or insufficiencies in information provided. However, the environmental professional reviewing records shall make a reasonable effort to compensate for mistakes or insufficiencies in the information reviewed that are obvious in light of other information of which the environmental professional has actual knowledge.

A listing of standard environmental record sources is listed below.

<i>Standard Environmental Records Sources (where available)</i>	<i>Approximate Minimum Search Distance (miles)</i>
Federal NPL Site List	1.0
Federal delisted NPL	0.5
Federal CERCLIS list	0.5
Federal CERCLIS NFRAP list	0.5
Federal RCRA CORRACTS list	1
Federal RCRA TSD list	0.5
Federal RCRA Generators list	Property and Adjoining
Federal institutional control/ engineering control registries	Property only
Federal ERNS list	Property only
State/tribal list of hazardous waste sites	
State/tribal NPL	1.0
State/tribal CERCLIS	0.5
State/tribal Landfill	0.5
State/tribal LUST	0.5
State/tribal Registered UST/AST	Property and Adjoining
State/tribal institutional control/ engineering control registries	Property only
State/tribal VCP sites list	0.5
State/tribal Brownfield sites list	0.5

Other sources of information that could be reviewed include, but is not limited to, the Mississippi Department of Environmental Quality (MDEQ), the local Fire Department, Planning Department, Building Permits Department, aerial photographs, fire insurance maps, property tax files, recorded land title records, topographic maps, and city directories.

### *2.2.2 Site Reconnaissance*

The objective of the site reconnaissance was to obtain information indicating the likelihood of identifying RECs in connection with the property. A site reconnaissance was conducted by Gill|Spectrum personnel experienced in hazardous materials/petroleum product surveys. Surface conditions and current activities on the subject property and on adjoining properties were observed. An inventory of potential contaminant sources on, and adjoining, the subject property was completed on the basis of regulatory agency record reviews and visual observations. Limitations encountered during the site reconnaissance are included in the discussion of the report.

### *2.2.3 Interviews*

The objective of interviews was to obtain information indicating RECs in connection with the property. Interviews with past and present owner, operators, and/or occupants of the property, where possible, were conducted as part of this Phase I ESA. Other persons potentially interviewed could include State and local government officials, local fire department personnel, local historians, and others that may have specialized knowledge of the site and/or surrounding properties.

### *2.2.4 Evaluation and Report Preparation*

This Phase I ESA report summarizes the findings from the tasks described above. Gill|Spectrum has provided a discussion of potential and existing contamination sources, and conclusions regarding our evaluation of the likelihood of contamination on the target property.

### **2.3 Significant Assumptions**

No significant assumptions were made during the conduct of this Phase I ESA unless otherwise stated.

### **2.4 Limitations and Exceptions**

Gill|Spectrum has performed our services for this project in accordance with our agreement, ASTM Practice E 1527-13, and the site-specific requirements provided by client, where applicable. No guarantees are either expressed or implied.

The records search was limited to information available from public sources; this information is changing continually and is frequently incomplete. Unless we have actual knowledge to the contrary, all information obtained from interviews or provided to us has been assumed to be correct and complete. Gill|Spectrum assumes no liability for findings or conclusions we may draw based on misleading or false information provided to us. Further, we assume no liability for items, conditions, or situations not visible or readily accessible through the application of standard professional care and practice.

There is no investigation that is thorough enough to preclude the presence of materials on the subject property that presently, or in the future, may be considered hazardous. Because regulatory evaluation criteria are constantly changing, concentrations of contaminants present and considered to be acceptable may, in the future, become subject to different regulatory standards and require remediation. Opinions and judgments expressed herein, which are based on our understanding and interpretation of current regulatory standards, should not be construed as legal opinions.

### **2.5 Special Terms and Conditions**

There are no special terms and/or conditions pertaining to this Phase I ESA.

### **2.6 User Reliance**

This report is certified to Mississippi Region VI RAD, LP. Any reliance on this report by other parties shall be at such party's sole risk.

**3.0 SITE DESCRIPTION**

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**3.1 Location and Legal Description**

The target property is located at 131 King Ranch Circle in Canton, Mississippi (Figure 1 – Appendix A) An aerial view of the target property is provided as Figure 2 and a parcel tax map is provided as Figure 3.

**3.2 Site and Vicinity General Characteristics**

The target property is located in a residential area of Canton, Mississippi. The uses of adjoining properties are listed in Section 3.5 below.

**3.3 Current Use of Property**

The target property is current developed as a single-family housing community.

**3.4 Descriptions of Structures, Roads, and Other Site Improvements**

The target property has been improved with 40 single unit buildings units as well as a single-story office and maintenance shop. The remainder of the property consists of community areas and maintained lawn. The buildings are faced with brick and vinyl siding and are covered with shingle roofing. Associated concrete parking areas are located adjacent to each building.

**3.5 Current Uses of Adjoining Properties**

Direction	Use
North	Residential
South	Residential
East	Residential
West	Undeveloped

## **4.0 USER PROVIDED INFORMATION**

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A User Questionnaire was completed by Jennifer Croxton to assist the environmental professional in evaluating the target property. A copy of the completed User Questionnaire is provided in Appendix B and a summary of the information provided is discussed below.

### **4.1 Title and Judicial Records for Environmental Liens and AULs**

Judicial and Title Records were not provided to Gill|Spectrum for review and discussion in this Phase I ESA report. However, the User did not identify any environmental liens or AULs in connection with the target property.

### **4.2 Specialized Knowledge or Experience of the User**

The User does have specialized knowledge of the activities conducted on the target property. Additionally, the user is not aware of any spill or releases that have occurred or of any cleanup activities that have taken place on the property.

### **4.3 Valuation Reduction for Environmental Issues**

The User states that the purchase price represents fair market value.

### **4.4 Commonly Known or Reasonably Ascertainable Information**

The User is aware of past uses of the property but is not aware of any environmental incidents associated with the property.

### **4.5 Property Owner, Manager, and/or Occupant Information**

The target property is owned the US Department of Housing and has been assigned parcel number 092F-13B-001/02.00.

### **4.6 Reason for Performing Phase I ESA**

This Phase I ESA has been conducted as part of the application for low income housing tax credits for the purpose of identifying RECs and/or BERs.

## 5.0 RECORDS REVIEW

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### 5.1 Standard Environmental Record Sources

Environmental Data Resources, Inc. (EDR) conducted a search of available environmental records. The report, dated February 5, 2019, was designed to assist parties seeking to meet the requirements of EPA's Standards and Practices for All Appropriate Inquiries (40 CFR Part 312), the ASTM Standard Practice for Environmental Site Assessments (E 1527-13) or custom requirements developed for the evaluation of environmental risks associated with a parcel of real estate.

EDR's search of available ("reasonably ascertainable") government records on the target property and within the search radius around the target property included the databases listed on Pages 5 through 8 of the Radius Search database report (Appendix C).

#### 5.1.1 Target Property

The target property was not listed in any of the databases searched as part of this report.

#### 5.1.2 Surrounding Properties

There were no sites listed in any of the databases searched as part of this report.

Discussion of Groundwater Flow Direction - The location (with respect to the groundwater flow direction) of any site to the target property is essential in helping evaluate whether or not a site (or contamination associated with a site) represents a recognized environmental condition to the target property. Based on our review of site topography and surface water features, it appears that the groundwater flow direction in the area would be predominantly towards the west-southwest.



### 5.1.3 Orphan Sites

One orphan site was identified in the database report under the name Jimbo's Truck Stop. After further investigation it appears that this facility is greater than one mile away in an interpreted crossgradient to downgradient position. *As such, this site does not represent a REC to the target property.*

## 5.2 Additional Environmental Record Sources

No additional environmental records sources, other than those discussed previously, were considered necessary by the environmental professional to supplement the standard environmental records to assist in evaluating recognized environmental conditions in association with the target property.

## 5.3 Physical Setting Sources

### TARGET PROPERTY INFORMATION

#### ADDRESS

101 KING RANCH CIRCLE  
CANTON, MS 39046

#### COORDINATES

Latitude (North): 32.6261800 - 32° 37' 34.24"  
Longitude (West): 90.0542430 - 90° 3' 15.27"  
Universal Transverse Mercator: Zone 15  
UTM X (Meters): 776392.2  
UTM Y (Meters): 3613489.5  
Elevation: 220 ft. above sea level

### USGS TOPOGRAPHIC MAP ASSOCIATED WITH TARGET PROPERTY

Target Property: TP  
Source: U.S. Geological Survey  
  
Target Property: S  
Source: U.S. Geological Survey

### AERIAL PHOTOGRAPHY IN THIS REPORT

Portions of Photo from: 20140924, 20140923, 20140826  
Source: USDA

## 5.4 Historical Property Use Information

Historical property use information was obtained through a search of readily available and reasonable ascertainable sources that included a review of Sanborn Fire Insurance Maps, historical maps and aerial photographs, and interviews with persons knowledgeable of the site. A discussion of historical information sources is provided below and interviews with persons knowledgeable of the site are provided in Section 7.0 - Interviews.

### 5.4.1 Sanborn Fire Insurance Map Review

A review of available Sanborn Fire Insurance Map indexes, as provided by EDR, indicates no coverage for the target property or surrounding area. Documentation of no coverage is provided in Appendix D.

### 5.4.2 Historical Maps and Aerial Photographs

Historical maps and aerial photographs for the target property and surround area were obtained through the EDR. The historical maps/photographs are provided in Appendix E and summaries for each map are provided below:

Year	Property	Discussion
1949, 1952	Target	Target property appears to be developed for agricultural use.
	Surrounding	Surrounding properties appear to be developed for agricultural purposes.
1971	Target	The target property has not changed significantly from the previous aerial photographs.
	Surrounding	A residential community has been developed to the southeast. The properties to the north, west and east remain undeveloped or developed or agricultural use.
1985, 1992	Target	The target property has not changed significantly from the previous aerial photographs.
	Surrounding	The adjacent property to the south has been developed into a residential community.
1996	Target	The target property has been developed in similar configuration with the current use of the property.
	Surrounding	The surrounding properties have not changed significantly from the previous aerial photographs.
2007, 2009, 2010, 2012	Target	The target property has not changed significantly from the previous aerial photograph.
	Surrounding	The properties to the west and south have been developed into a residential community. The properties to the north and east remain predominantly undeveloped.

**6.0 SITE RECONNAISSANCE**

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**6.1 Methodology and Limiting Conditions**

Gill|Spectrum personnel (Thornton Turner) conducted a visual reconnaissance of the subject property on February 14, 2019. The property was walked in an attempt to identify potential RECs and/or BERs, if any. During the reconnaissance, there were no limiting conditions that prohibited Gill|Spectrum from observing the property, except that only a select number of apartments were accessed during the site visit. Photographs taken during the site reconnaissance are provided in Appendix F.

**6.2 General Site Setting**

The site is underlain by the Upper Eocene formation of the Jackson Group. This is characterized by green and gray calcareous clay containing some sand and marl; Moodys Branch formation at base, shells embedded in glauconitic clayey quartz sand. (Moore, William Halsell, 1969)

**6.3 Exterior Observations**

The target property contains 40 single unit residential buildings, along with a single-story office and maintenance shop. The buildings are faced with brick and vinyl siding, and are covered with shingle roofing. One concrete parking area is located on the target property.

**6.4 Specific Items of Interest**

In addition to the general observations described above, specific items/areas of interest are discussed below.

Area of Interest	Discussion
USTs	None Observed
ASTs	None Observed
Drums	None Observed
Drains/Sumps	None Observed
Stained Soil/Stressed Vegetation	None Observed
Water Wells	None Observed
Septic Tanks/Field Lines	None Observed
Electrical Transformers	Nine pole-mounted transformers were identified on the target property. No visible leaks or signs of stressed vegetation was observed around the transformers. The transformers are owned and operated by the Entergy Mississippi, Inc.
Solid Wastes	A community trash collection bin was centrally-located on the target

Area of Interest	Discussion
	property. No signs of spills/release were identified.
Pits, Ponds, and/or Lagoons	None Observed
In-ground Hydraulic Lifts	None Observed
Waste Incineration	None Observed
Chemicals and/or Waste Materials	None Observed
Pipelines	None Observed

**6.5 Environmental Assessment Checklists**

As part of this Phase I ESA, Gill|Spectrum personnel completed the 24 CFR Part 58 Checklist “Environmental Assessment Determination and Compliance Findings for HUD-Funded Projects” (provided as Appendix G). A summary of each required section is provided in the sections below.

*6.5.1 Airport Hazards*

There were no civilian airports within 2,500 feet or military airports within 15,000 feet of the target property. A map depicting nearby airports with 2,500 and 15,000 foot buffers is provided as Appendix A (Figure 4) and the HUD Airport Hazards worksheet is provided in Appendix G.

*6.5.2 Coastal Barrier Resources*

The project is not located within the Mississippi Coastal Zone, which is defined by the three coastal counties. The HUD Coastal Barrier Resources worksheet is provided in Appendix G.

*6.5.3 Flood Insurance*

The target property is not located within a FEMA designated flood hazard area as noted by FEMA Flood Insurance Rate Map number 28089C0245F (Figure 5). The HUD Flood Insurance worksheet is provided in Appendix G.

*6.5.4 Clean Air*

The project will not consist of new construction and will not exceed *de minimis* or threshold emissions levels or screening levels of criteria pollutants. The HUD Air Quality worksheet is provided in Appendix G.

#### 6.5.5 *Coastal Zone Management*

The project is not located within the Mississippi Coastal Zone, which is defined by the three coastal counties. The HUD Coastal Zone Management worksheet is provided in Appendix G.

#### 6.5.6 *Contamination and Toxic Substances*

This Phase I ESA did not identify any petroleum products or hazardous materials on the target property. The HUD Multi-Family Site Contamination worksheet is provided in Appendix G.

#### 6.5.7 *Endangered Species*

The USFWS Endangered Species IPaC Trust Resources Report was obtained for analyzing project level impacts of Threatened and Endangered Species (T&E Species) in the project area. The USFWS lists two threatened species were identified. There are no critical habitats located within the target property boundary and therefore no species requiring those habitats are present. The target property is developed as an apartment complex with associated paved parking areas, sidewalks, manicured lawns and residential landscaping. Based on site reconnaissance data and background information on each of the listed species, the functional aquatic and terrestrial resources required to support any of the listed species are absent on the target property. The USFW IPaC report is provided as Appendix H and the HUD Endangered Species worksheet is provided in Appendix G.

#### 6.5.8 *Explosive/Flammable Hazards*

The databases searched as part of this report did not indicate ASTs within 0.25 miles of the target property. Further, during the site reconnaissance, no ASTs were visually identified within one mile of the target property. The HUD Explosive/Flammable Hazards worksheet is provided in Appendix G.

#### 6.5.9 *Farmlands Protection*

No "important farmland," including prime farmland, unique farmland, or farmland of statewide or local importance regulated under the Farmland Protection Policy Act, was

identified on the target property. The HUD Farmlands Protection worksheet is provided in Appendix G.

#### *6.5.10 Floodplain Management*

The target property is not located within a FEMA designated flood hazard area as noted by FEMA Flood Insurance Rate Map number 28089C0410F (Figure 5). The HUD Flood Insurance worksheet is provided in Appendix G.

#### *6.5.11 Historic Preservation*

A request for Section 106 clearance was submitted to the Mississippi Department of Archives and History (MDAH). On October 9, 2018, MDAH sent a letter stating the property is not eligible for listing in the National Register of Historic Places nor is it located in a National Register District. As such, MDAH has no objection with the proposed project. A copy of this letter is provided in Appendix G. A map obtained from the National Register of Historic Places is provided as Appendix A (Figure 6) the HUD Historic Preservation worksheet is provided in Appendix G.

#### *6.5.12 Noise Abatement & Control*

A noise assessment was conducted for the target property per HUD regulations and guidelines. The target property is not located within 1,000 feet of a road source, 3,000 feet of a railroad source, 5 miles of a public civil airport source, or 15 miles of a military airport. Based on these factors, further assessment for noise was not required. Supporting documentation and maps are provided in Appendix G.

#### *6.5.13 Sole Source Aquifers*

A map showing the property does not lie within a sole source aquifer is provided in Appendix A (Figure 7). The HUD Sole Source Aquifers worksheet is provided in Appendix G.

#### *6.5.14 Wetlands Protection*

No wetlands are present on the target property according to the U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI) map (Figure 8), and as confirmed by our site reconnaissance (lack of hydrophytic vegetation, iron redox indicators in soil,

and visible hydrologic feature). The HUD Wetlands Protection worksheet is provided in Appendix G.

#### *6.5.15 Wild/Scenic Rivers*

The property does not lie near any rivers as defined by the National Wild and Scenic Rivers act. A map showing nearby rivers from the Nationwide Rivers Inventory is provided in Appendix A (Figure 9) and the HUD Wild/Scenic Rivers worksheet is provided in Appendix G.

#### *6.5.16 Environmental Justice*

There will be no adverse environmental impacts associated with this project. The HUD Environmental Justice worksheet is provided in Appendix G.

#### *6.5.17 Asbestos Containing Materials Survey*

A walk-through visual inspection of building materials was performed on June 13, 2017 by Spectrum's AHERA trained personnel (Richard Johnson ABI-00008419) for the purpose of identifying and sampling suspect ACM. Suspect ACM material identified was sampled for laboratory analysis to determine if the materials contained asbestos in regulated concentrations. A total of 12 separate samples were collected for analysis. Each sample collected by the inspector was placed in a laboratory approved container and labeled. A chain of custody was completed and shipped with the samples to a National Voluntary Laboratory Accreditation Program (NVLAP) approved laboratory for analysis of ACM using Polarized Light Microscopy (PLM). The laboratory was instructed to stop analyzing a Homogenous Area (HA) once a positive result for asbestos was noted (positive stop).

Although 12 individual samples were collected, certain of these samples contained multiple layers and some were not analyzed due to positive stop conditions. Therefore, a total of 21 separate materials were analyzed in the laboratory. None of the materials tested yielded positive results for ACM.

The inspector's credentials, a summary table of the data and a copy of the laboratory analytical reports with chain of custody documentation is provided in Appendix I.

*6.5.18 Lead Based Paint*

Since the facility was constructed after 1978, an assessment of lead-based paint was not required.

**6.8 Adjoining Properties**

Direction	Use
North	Residential
South	Residential
East	Residential
West	Undeveloped



## **7.0 INTERVIEWS**

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### **Interview with Michael Clopton**

Gill|Spectrum interviewed Mr. Clopton on February 14, 2019, during site reconnaissance. Mr. Clopton has been the maintenance supervisor for about three and a half years. Mr. Clopton stated that he is not aware of any USTs, ASTs, or buried drums on the property. Further, Mr. Clopton stated that he is not aware of any responses to environmental incidents on the target property. Moreover, Mr. Clopton also stated that the property was on city power and city water/sewer systems, and does not use gas. Lastly, Mr. Clopton informed Spectrum that Entergy Mississippi, Inc. owns the transformers on site.

### **Interview with Willie McGriggs**

Gill|Spectrum interviewed Mr. McGriggs on July 11, 2017 during the site reconnaissance. Mr. McGriggs has been the maintenance supervisor site for the past 6 years. Mr. McGriggs stated that he is not aware of any USTs/ASTs on the property that could have been used for the storage of petroleum products and/or hazardous materials. Similarly, Mr. McGriggs is not aware of the presence of any buried drums or petroleum products and/or hazardous materials on the property. Further, Mr. McGriggs stated that he is not aware of any responses to environmental incidents on the target property. Mr. McGriggs also stated that the property was on city power and city water/sewer systems.

### **Fire Department Interview**

Gill|Spectrum personnel interviewed Canton Fire Chief Joe Davis who has been with the Canton fire department for 19 years. He is not aware of any incidents involving hazardous materials and/or petroleum products. Gill|Spectrum attempted to contact the Canton Fire Department again on February 19, 2019. As of the date of this report, no response has been received.

## 8.0 VAPOR ENCROACHMENT SCREENING

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### 8.1 Introduction

Gill|Spectrum conducted a vapor encroachment screen (VES) in accordance with ASTM E2600-10: Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions as part of this Phase I ESA to identify a Vapor Encroachment Condition<sup>8</sup> (VEC) associated with the target property. Factors considered by Gill|Spectrum's Environmental Professional included the following:

- Use of Target Property
- Types of Chemicals of Concern (COC)
- Location(s) of Known/Suspected Contamination
- Soil Characteristics
- Depth to Groundwater
- Vapor Conduits
- Cleanup Status of Contaminated Property(s)

### 8.2 Discussion

As part of the VES evaluation, Gill|Spectrum considered the above factors in addition to the anticipated groundwater flow direction and barriers/conduits affecting groundwater flow, if any. The position (with respect to the groundwater flow direction) of any site to the target property is essential in helping evaluate whether or not a site (or contamination associated with a site) represents a VEC to the target property.

Based on our review of site topography and surface water drainage features, it appears that the groundwater flow direction in the vicinity of the target property would be toward the west-southwest.

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<sup>8</sup> Vapor Encroachment Condition (VEC) — the presence or likely presence of COC vapors in the sub-surface of the target property (TP) caused by the release of vapors from contaminated soil or groundwater either on or near the TP.

### **8.3 Findings**

The target property was undeveloped or farmland until it was developed for single-family housing sometime between 1992 and 1996. The property continues to be used for single-family housing to this day.

No sites were identified in the database report within the search distance set forth in ASTM E2600-10 (up to 0.33 miles from the target property for VOCs and 0.1 miles for petroleum sites) and in an interpreted upgradient to crossgradient positions. As such, it is unlikely that the current/historical uses of these sites would adversely affect the target property.

Based on our review of the information presented above, it is our opinion that a VEC to the target property is unlikely.

## 9.0 FINDINGS

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Gill|Spectrum has conducted a review of readily available and reasonably ascertainable records for the site, conducted a site reconnaissance along with interviews with persons knowledgeable of the site and surrounding properties, and evaluated the data during the preparation of this report. Based on our evaluation of the data, Gill|Spectrum presents the following findings:

- *Vapor Encroachment Conditions*
- *Current and historical use of target property; and*
- *Current and historical use of adjacent properties*

## 10.0 OPINION

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Based on the information obtained during the site reconnaissance, records reviews, and interviews, Gill|Spectrum has evaluated current and historical information pertaining to the target and surrounding properties. Based on these evaluations, opinions regarding conditions observed and the classification of these conditions is presented below. For each condition, Gill|Spectrum has classified each as a REC, a historical REC<sup>9</sup>, a Controlled REC<sup>10</sup>, or a BER and presents an opinion why the condition is classified as such.

### 10.1 Vapor Encroachment Condition

Pursuant to ASTM E1527-13, the EP must make a determination as to whether or not a VEC is associated with the target property. Based on our review of readily available historical information and other information obtained during the site reconnaissance, Gill|Spectrum presents the following opinions.

The target property was developed for single-family use by 1996. Prior to this use, the target property was undeveloped or farmland. Based on the findings of the site reconnaissance and interviews with people knowledgeable of the site and surrounding area, the use of petroleum products and/or hazardous materials was not documented.

No sites were identified in the database report within the search distance set forth in ASTM E2600-10 (up to 0.33 miles from the target property for VOCs and 0.1 miles for petroleum sites) and in an interpreted upgradient to crossgradient positions. *Based on our*

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<sup>9</sup> *Historical Recognized Environmental Condition*— A past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls). Before calling the past release a historical recognized environmental condition, the environmental professional must determine whether the past release is a recognized environmental condition at the time the Phase I Environmental Site Assessment is conducted (for example, if there has been a change in the regulatory criteria). If the EP considers the past release to be a recognized environmental condition at the time the Phase I ESA is conducted, the condition shall be included in the conclusions section of the report as a recognized environmental condition.

<sup>10</sup> *Controlled Recognized Environmental Condition*—A recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls).

*review of the information presented above, it is our opinion that a VEC to the target property is unlikely.*

## **10.2 Current and Historical Use of Target Property**

Based on a review of historical record sources, the target property was undeveloped or farmland until it was developed for single-family housing sometime between 1992 and 1996. The property continues to be used for as a single-family housing development to this day. The target property was not identified in the database report; furthermore, during the site reconnaissance, Gill|Spectrum did not identify any areas known or suspected to represent an environmental liability to the target property. *Based on our review of the environmental data report, a reconnaissance of the target property, and our review of surface water drainage patterns, the target property is not interpreted to represent a recognized environmental condition to the target property.*

## **10.3 Current and Historical Use of Adjacent Property**

Based on a review of historical record sources, surrounding properties remained undeveloped until the early 1970s when the land to the southeast was developed into a residential community. By the mid-1980s properties to the east and south were developed for residential use; however, the property to the north remained undeveloped until the late 1990s. By 1996, the surrounding properties in all compass directions had been developed in similar configuration with what was observed during the site reconnaissance. No surrounding sites were identified in the database report; furthermore, no sites were identified during the site reconnaissance that would represent an environmental concern. *Based on our review of the environmental database report, a reconnaissance of the surrounding properties, and our review of surface water drainage patterns, none of the surrounding land uses are interpreted to represent a recognized environmental condition to the target property.*

## 11.0 CONCLUSION

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We have performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E1527 for the target property. Any exceptions to, or deletions from, this practice are described in Section 12.0 – Deviations of this report. Based on our review of current and historical site data, the following conclusions are presented.

### ***Recognized Environmental Conditions***

A recognized environmental condition (REC), as defined in the ASTM Standard, means the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. De minimis conditions are not REC's. *Based on our review of current and historical site data, no RECs were identified in connection with the target property.*

### ***Historical Recognized Environmental Conditions***

A historical recognized environmental condition (HREC), as defined in the ASTM Standard, is an environmental condition that in the past would have been identified as a REC, but has been adequately addressed and therefore no longer represents a REC. *Based on our review of current and historical site data, no HRECs were identified in connection with the target property.*

***Controlled Recognized Environmental Conditions***

A controlled recognized environmental condition (CREC), as defined in the ASTM Standard, is a REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent or meeting risk-based criteria established by the regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls). *Based on our review of current and historical site data, no CRECs were identified in connection with the target property.*

***Business Environmental Risks***

A business environmental risk (BER), as defined in the ASTM Standard, is a risk which can have a material environmental or environmentally driven impact on the business associated with the current or planned use of a parcel of commercial real estate, not necessarily limited to those environmental issues required to be investigated in this practice. *Based on our review of current and historical site data, no BERs were identified in connection with the target property.*



## **12.0 DEVIATIONS**

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Historical information regarding the subject site has been obtained through the use of historical topographic maps, aerial photographs and interviews with individuals cognizant of the site. The earliest map that was readily available and reviewed was a 1949 Aerial photograph. Through a review of historical record sources; the use of the target property could not be independently evaluated on 5 year increments back to a time where the property was not developed. The data gaps in the historical review were not during times of significant change on the target property. As such, it is not believed that this lack of readily available or reasonable ascertainable data represents a significant data gap that would lead to the identification of additional RECs or BERs on the target property.

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**13.0 REFERENCES**

40 CFR Part 312 – Innocent Landowners, Standard for Conducting All Appropriate Inquiry.

American Society of Testing and Materials (ASTM), Practice E 1527-13. Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.

Moore, William Halsell, 1969, reprinted 1985, Geologic Map of Mississippi, Compiled by Bicker, A. R., Jr., a revision of the geologic map published by the MS Geological Survey in 1945 in cooperation with the USGS, revised from data submitted by Dr. E. E. Russell of MS State University from published reports of the MS Geological Survey and from field revisions, Mercury Maps Inc., Jackson, MS.

Environmental Data Resources Radius Map Report dated February 5, 2019.

Environmental Data Resources Certified Sanborn Map Report dated June 11, 2017.

Environmental Data Resources Historical Aerial Photograph Report, dated June 13, 2017.

#### **14.0 SIGNATURES OF ENVIRONMENTAL PROFESSIONALS**

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I declare that to the best of my professional knowledge and belief, I meet the definition of Environmental Professional<sup>11</sup> responsible for conducting the Phase I Environmental Site Assessment and preparation of the report, as defined in §312.10 of 40 CFR Part 312. I have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. I have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.


**Gill|Spectrum Environmental, Inc.**

  
Jamie D. Cox, P.E.  
Division Manager

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<sup>11</sup> Environmental Professional – (1) a person who possesses sufficient specific education, training, and experience necessary to exercise professional judgment to develop opinions and conclusions regarding conditions indicative of releases or threatened releases on, at, in, or to a property, sufficient to meet the objectives and performance factors in §312.20(e) and (f). (2) Such a person must (i) hold a current Professional Engineer’s or Professional Geologist’s license or registration from a state, tribe, or U.S. territory and have the equivalent of three years full-time relevant experience; or be licensed/certified by the Federal government, a state, tribe, and U.S. Territory to perform environmental inquiries as defined in §312.21 and have the equivalent of three years full-time relevant experience; or have a baccalaureate or higher degree from an accredited institution from an accredited institution of higher education in a discipline of engineering or science and the equivalent of five years of full time relevant experience; or have the equivalent of ten years of full time relevant experience.

15.0 QUALIFICATIONS OF ENVIRONMENTAL PROFESSIONALS



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**Jamie Davies Cox, P.G. (ALPG 1469 & GAPG 2260)**  
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*Atlanta Office - P.O. Box 501255 - Atlanta, GA - 205-612-9298*  
*Birmingham Office - 85 Spectrum Cove - Alabaster, AL 35007 - 205-664-2000*

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<p><b>Areas of Expertise</b></p> <ul style="list-style-type: none"><li>• Management &amp; Coordination</li><li>• Technical Writing</li><li>• Contamination Assessments</li><li>• Environmental Assessments</li><li>• Regulatory Compliance Analysis &amp; Planning</li><li>• Environmental Auditing</li><li>• Sales &amp; Marketing</li><li>• NPDES &amp; SID Permitting Technical Assistance</li></ul> <hr/> <p><b>Years of Experience</b></p> <p><i>With Spectrum:</i> 6 years <i>University Employee:</i> 1 year</p> <hr/> <p><b>Education</b></p> <p>2012 - BS Geology, UA 2012 - GIS Certification</p>	<p><b>Overview</b></p> <p>Mrs. Cox is a graduate of the University of Alabama with a BS degree in Geology. She also holds a Geographic Information Systems Certificate from the University of Alabama. Mrs. Cox specializes in environmental site assessments, contamination assessments, environmental audits, construction and industrial stormwater compliance, and Alabama Tank Trustfund projects. Jamie has been employed with Spectrum since 2012.</p> <p>Mrs. Cox is responsible for project management, technical writing, state agency coordination, client coordination, budget management and marketing for the Spectrum's Southeastern Division located in Atlanta, Georgia.</p> <p><b>Areas of Involvement/Responsibility</b></p> <ul style="list-style-type: none"><li>• Management of Alabama Tank Trust Fund (ATTF) Sites</li><li>• Site Manager and technical writer of environmental site assessments</li><li>• Phase I and II Property evaluations for Real Estate Transactions and Development</li><li>• NPDES and SID Permitting-Technical Assistance</li><li>• Best Management Practices (BMP) and Spill Prevention Control and Countermeasure (SPCC) Plan Development and Implementation;</li><li>• Underground Storage Tank (UST) Assessment and Remediation;</li><li>• Regulatory Compliance Analysis and Planning;</li><li>• Air Monitoring Studies; and</li><li>• Environmental audits and regulatory compliance.</li></ul> <p><b>Training/Certification</b></p> <ul style="list-style-type: none"><li>• Alabama Professional Geologist (License Number 1469)</li><li>• Georgia Professional Geologist (License Number PG002260)</li><li>• GSWCC - Level II - Plan Reviewer/Design Professional</li><li>• Mine Safety and Health Administration (MSHA) Training Program completed on July 13, 2012.</li><li>• 40-hour Hazardous Waste Operations and Emergency Response (OSHA HAZWOPER) Certification of completed on August 14, 2015.</li><li>• Asbestos Inspector - Environmental Institute Certificate Number 4889</li><li>• Lead Inspector - Environmental Institute Certificate Number 2353</li></ul>
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Map data ©2019 Google Imagery ©2019 . DigitalGlobe. USDA Farm Service Agency | 50 m

Source: Image courtesy of EDR. Approximate site location outlined in red.

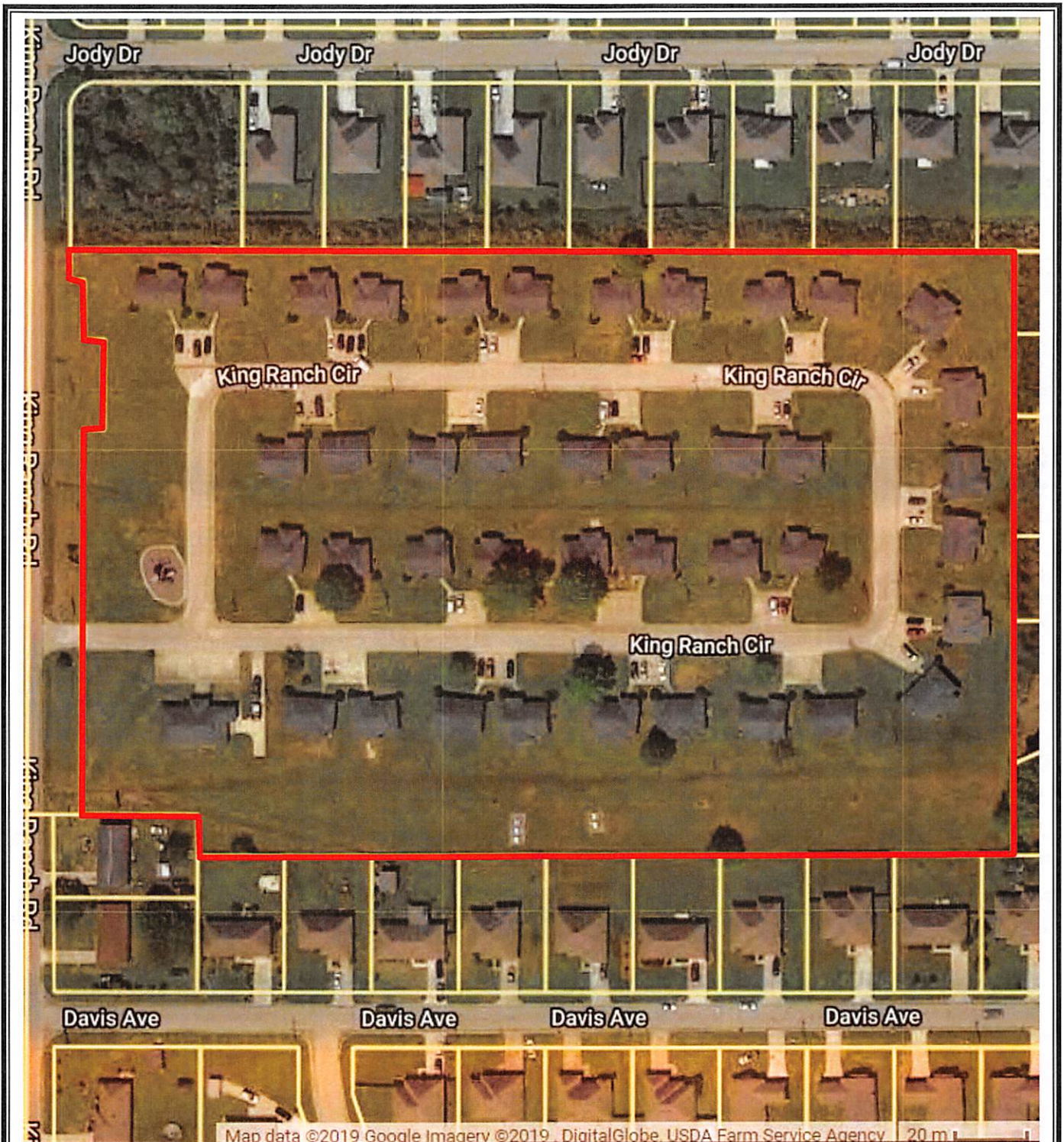


NO.	DATE	REVISION NOTE	BY

Drawn By:	Project #:
AH	2735
Checked By:	Date:
TT	2/15/2019
Project Mgr.:	File Name:
JC	2735-147-01

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F-205-664-2142

TITLE
<p><b>Figure 2</b> Site Aerial Map Sam Estes Estates 131 King Ranch Circle Canton, MS 39046</p>



Source: Image courtesy of EDR.  
 Tax ID: 092F-13B-001/02.00 Owner: U.S. Department of Housing  
 Approximate site location outlined in red.



NO.	DATE	REVISION NOTE	BY

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TITLE
<p>Figure 3            Site Tax Map            Sam Estes Estates            131 King Ranch Circle            Canton, MS 39046</p>



Source: Image courtesy of Google Earth.



NO.	DATE	REVISION NOTE	BY

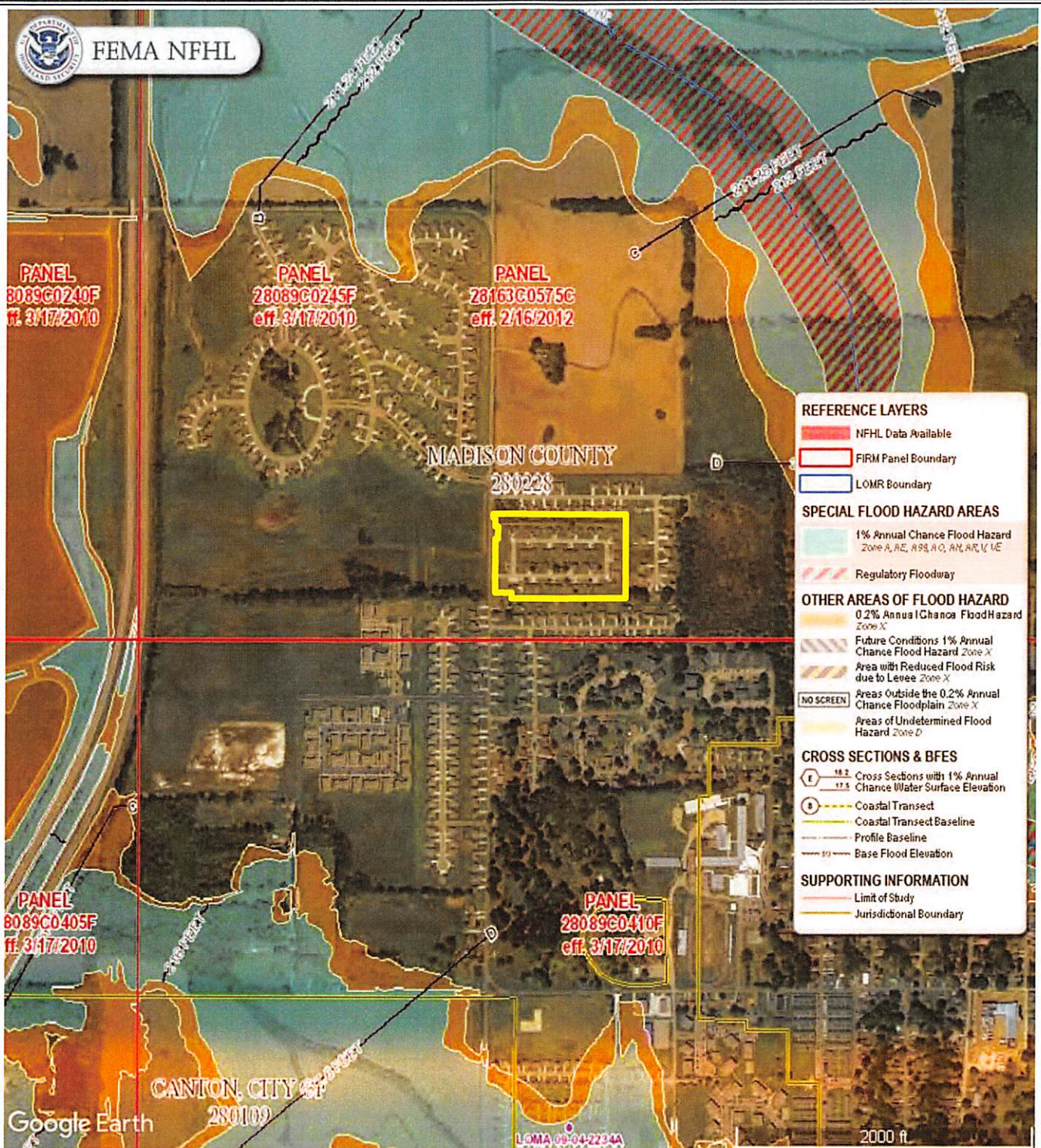
Drawn By:	Project #:
AH	2735
Checked By:	Date:
TT	2/15/2019
Project Mgr.:	File Name:
JC	2735-147-01

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TITLE
<p><b>Figure 4</b>            Airport Hazards Map            Sam Estes Estates            131 King Ranch Circle            Canton, MS 39046</p>



FEMA NFHL



**REFERENCE LAYERS**

- NFHL Data Available
- FIRM Panel Boundary
- LOMR Boundary

**SPECIAL FLOOD HAZARD AREAS**

- 1% Annual Chance Flood Hazard Zone A, AE, A99, A0, AN, AR, V, VE
- Regulatory Floodway

**OTHER AREAS OF FLOOD HAZARD**

- 0.2% Annual Chance Flood Hazard Zone X
- Future Conditions 1% Annual Chance Flood Hazard Zone X
- Area with Reduced Flood Risk due to Levee Zone X
- Areas Outside the 0.2% Annual Chance Floodplain Zone X
- Areas of Undetermined Flood Hazard Zone D

**CROSS SECTIONS & BFES**

- Cross Sections with 1% Annual Chance Water Surface Elevation
- Coastal Transect
- Coastal Transect Baseline
- Profile Baseline
- Base Flood Elevation

**SUPPORTING INFORMATION**

- Limit of Study
- Jurisdictional Boundary

Source: Image courtesy of Google Earth and FEMA. Approximate site location outlined in yellow.



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TITLE
Figure 5 FEMA Flood Insurance Rate Map Sam Estes Estates 131 King Ranch Circle Canton, MS 39046



NATIONAL PARK SERVICE  
**NATIONAL REGISTER  
 OF HISTORIC PLACES**



Source: Image courtesy of Google Earth and the National Register of Historic Places. Approximate Site Location outlined in red.



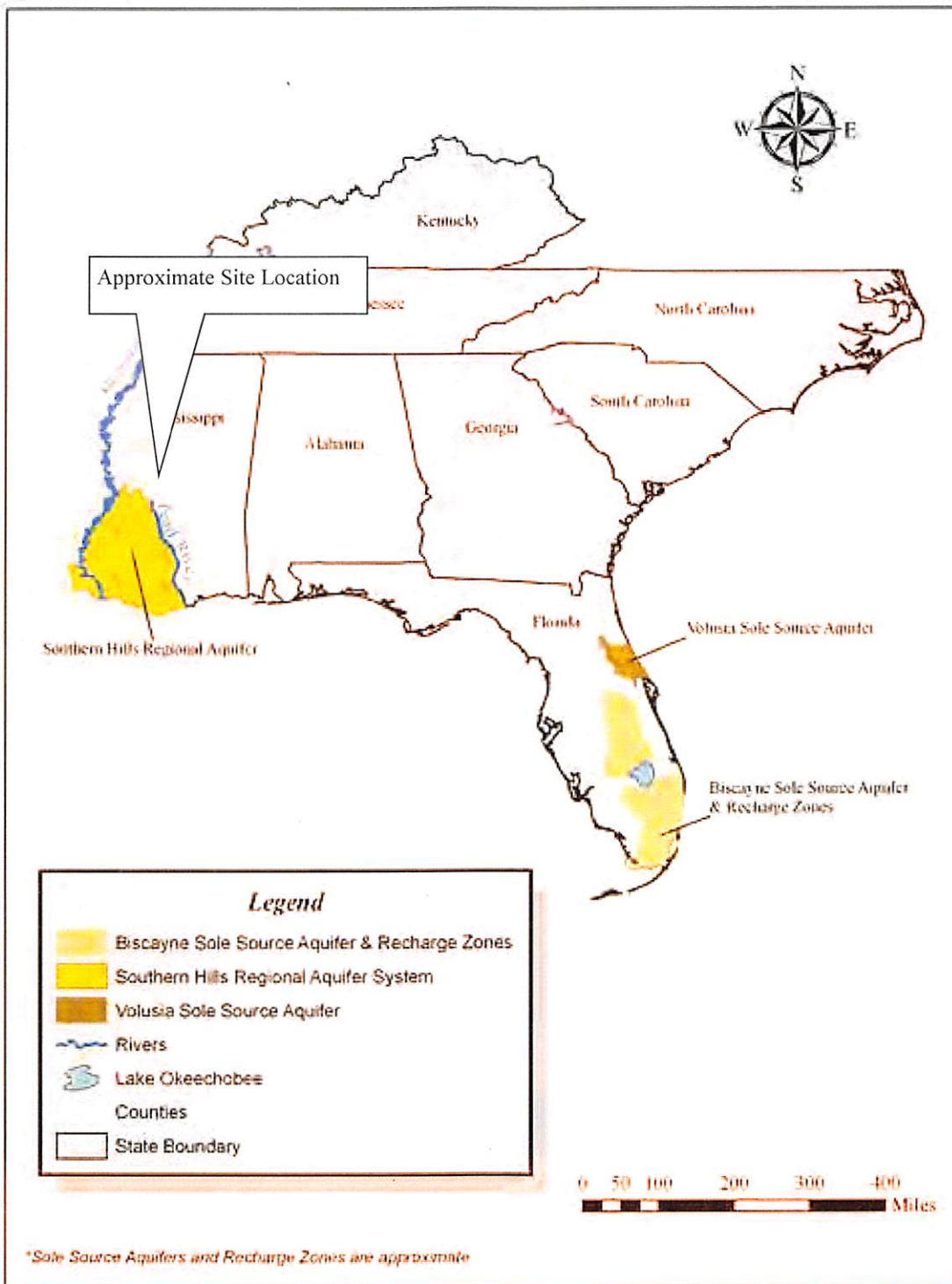
NO.	DATE	REVISION NOTE	BY

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TITLE
<b>Figure 6</b> National Register of Historic Places Map Sam Estes Estates 131 King Ranch Circle Canton, MS 39046



Source: Image courtesy of the HUD Exchange.



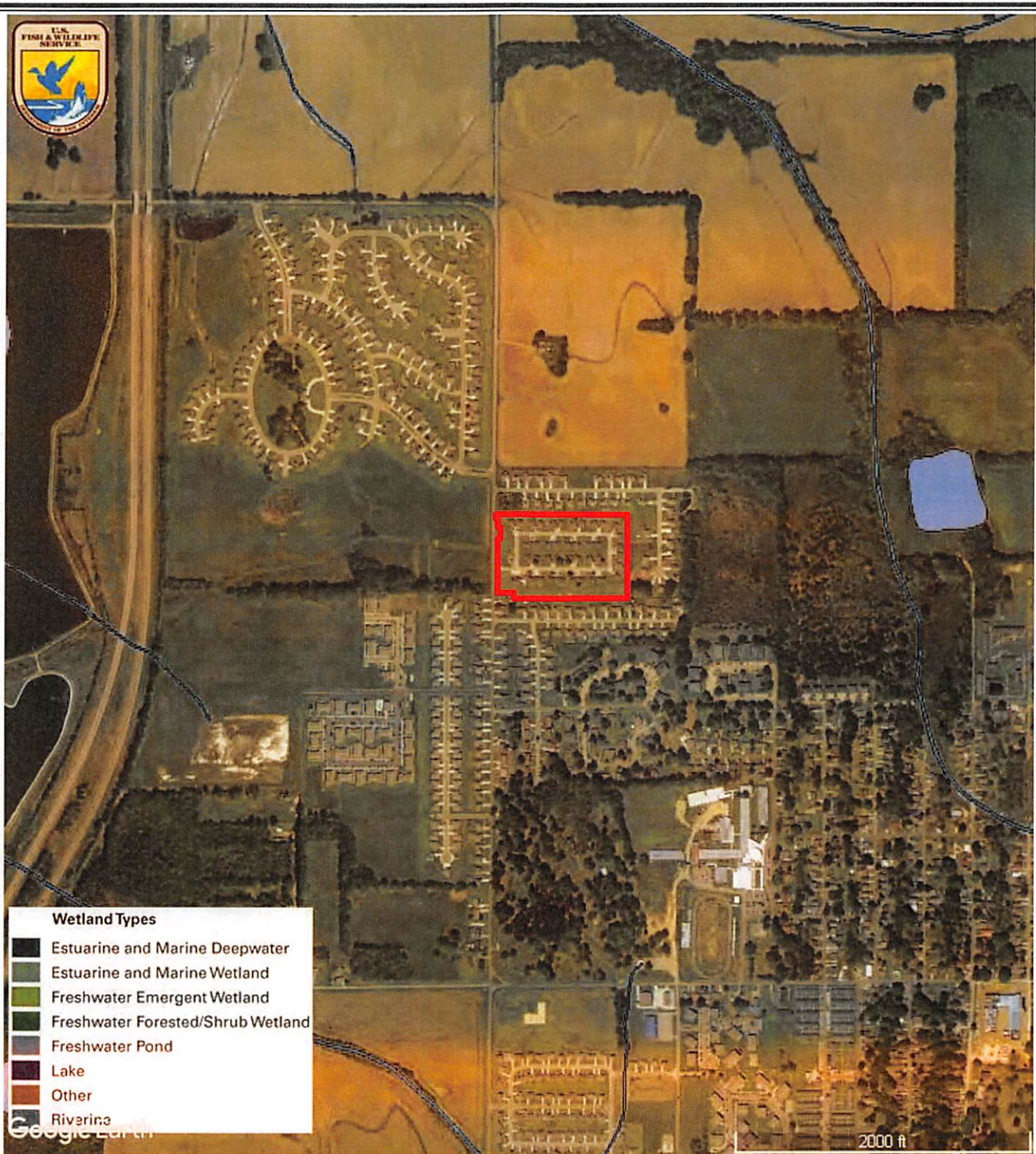
NO.	DATE	REVISION NOTE	BY

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TITLE
<p><b>Figure 7</b> Sole Source Aquifer Map Sam Estes Estates 131 King Ranch Circle Canton, MS 39046</p>



Source: Image courtesy of Google Earth Pro and US Fish & Wildlife. Approximate site location outlined in red.

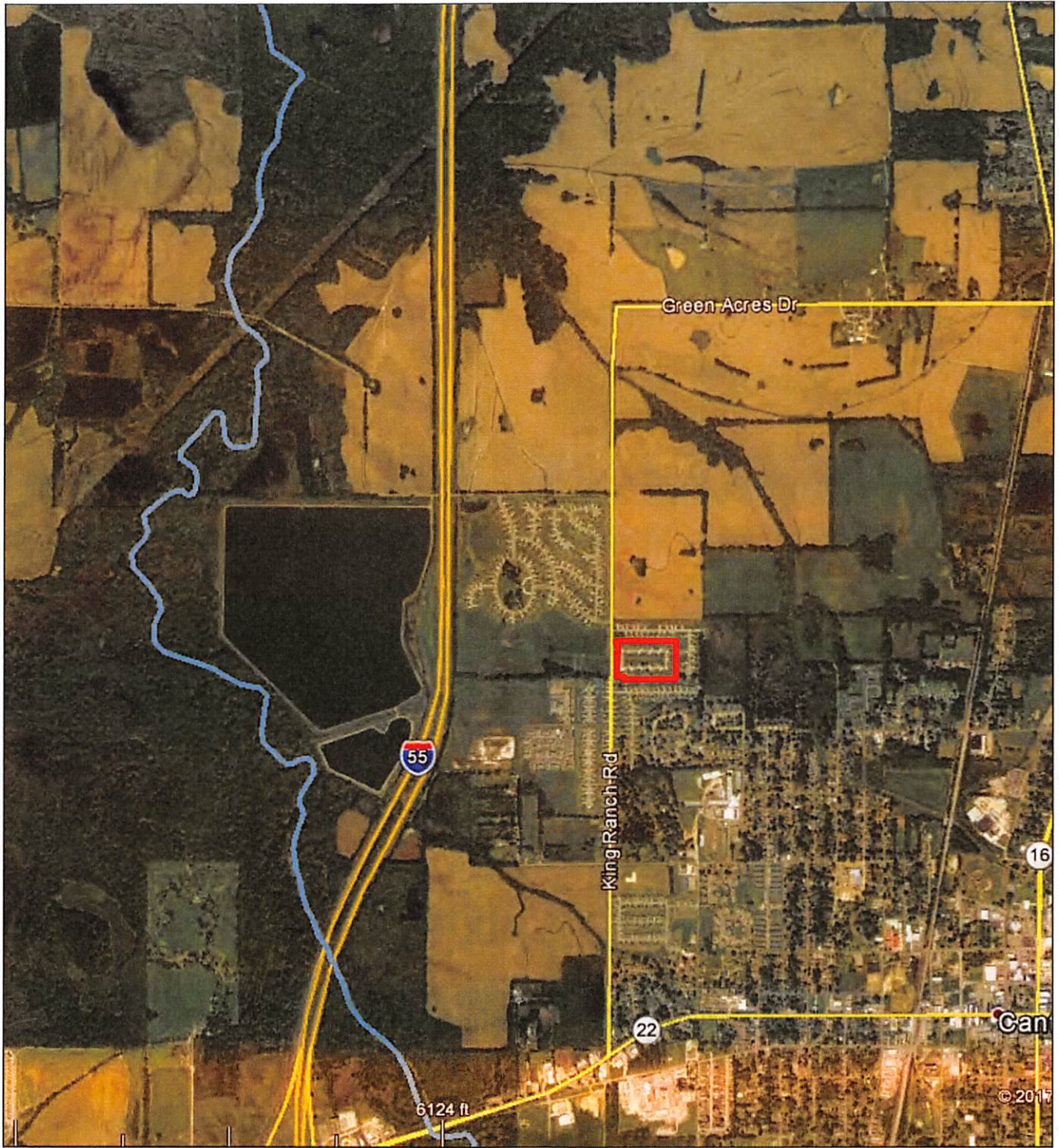


NO.	DATE	REVISION NOTE	BY

Drawn By:	Project #:
AH	2735
Checked By:	Date:
TT	2/15/2019
Project Mgr.:	File Name:
JC	2735-147-01

85 Spectrum Cove  
 Alabaster, AL 35007  
 O - 205-664-2000  
 F-205-664-2142

TITLE
<p><b>Figure 8</b>            NWI Map            Sam Estes Estates            131 King Ranch Circle            Canton, MS 39046</p>



Source: Image courtesy of Google Earth Pro and EPA Water Program.  
 National River highlighted in blue.  
 Approximate site location outlined in red.



NO.	DATE	REVISION NOTE	BY

Drawn By:	Project #:
AH	2735
Checked By:	Date:
TT	2/15/2019
Project Mgr.:	File Name:
JC	2735-147-01

  
**SPECTRUM**  
 Solutions to Your Environmental Challenges  
85 Spectrum Cove  
 Alabaster, AL 35007  
 O - 205-664-2000  
 F-205-664-2142

TITLE
<b>Figure 9</b> NRI Map Sam Estes Estates 131 King Ranch Circle Canton, MS 39046

**APPENDIX B**

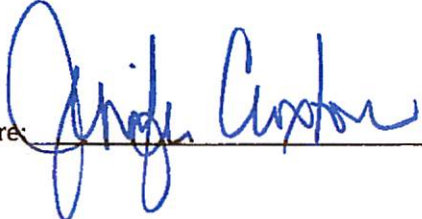
**USER QUESTIONNAIRE**

Phase I ESA – User Questionnaire

Name of User: Mississippi Region VI RAD, LP Contact Phone #: 318-224-2997 ext 1013  
 Project Name: Sam Estess Estates Contact Email: jcroxton@bgcadvantage.com

In order to qualify for one of the Landowner Liability Protections (LLPs) offered by the Small Business Liability Relief and Brownfields Revitalization Act of 2001 (the “Brownfields Amendments”), the User must conduct the following inquiries required by 40 CFR 312.25, 312.28, 312.29, 312.30, and 312.31. The User should provide the following information to Gill Group, Inc. along with work authorization. Failure to conduct these inquiries could result in a determination that “all appropriate inquiries” is not complete.

<p><b>1. Environmental cleanup liens that are filed or recorded against the site (40 CFR 312.25)</b>                  Did a search of recorded land title records (or judicial records where appropriate identify any environmental liens filed or recorded against the property under federal, tribal, state or local law?</p> <p>(In certain jurisdictions, federal, tribal, state, or local statutes, or regulations specify that environmental liens and AULs be filed in judicial records rather than in land title records. In such cases judicial records must be searched for environmental liens and AULs.)</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  <input type="checkbox"/> NA/Unk</p>
<p><b>2. Activity and land use limitations (AULs) that are in place on the site or that have been filed or recorded in a registry (40 CFR 312.26)</b>                  Did a search of recorded land title records (or judicial records as described above) identify any AULs, such as engineering controls, land use restrictions or institutional controls that are in place at the property and/or have been filed or recorded against the property under federal, tribal, state or local law?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  <input type="checkbox"/> NA/Unk</p>
<p><b>3. Specialized knowledge or experience of the person seeking to qualify for the LLP (40 CFR 312.28)</b>                  Do you have any specialized knowledge or experience related to the property or nearby properties? For example, are you involved in the same line of business as the current or former occupants of the property or an adjoining property so that you would have specialized knowledge of the chemicals and processes used by this type of business?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> NA/Unk</p>
<p><b>4. Relationship of purchase price to the fair market value of the property if it were not contaminated (40 CFR 312.29)</b>                  (A) Does the purchase price being paid for this property reasonably reflect the fair market value of the property?                  (B) If you conclude that there is a difference, have you considered whether the lower purchase price is because contamination is known or believed to be present at the property?</p>	<p>A) <input checked="" type="checkbox"/> Y <input type="checkbox"/> N  <input type="checkbox"/> NA                  B) <input type="checkbox"/> Y <input type="checkbox"/> N</p>
<p><b>5. Commonly known or reasonable ascertainable information about the property (40 CFR 312.30)</b>                  Are you aware of commonly known or reasonably ascertainable information about the property that would help the environmental professional to identify conditions indicative of releases or threatened releases? For example:                  (A) Do you know the past uses of the property?                  (B) Do you know of specific chemicals that are present or once were present at the property?                  (C) Do you know of spills or other chemical releases that have taken place at the property?                  (D) Do you know of any environmental cleanups that have taken place at the property?</p>	<p>A) <input checked="" type="checkbox"/> Y <input type="checkbox"/> N                  B) <input checked="" type="checkbox"/> Y <input type="checkbox"/> N                  C) <input checked="" type="checkbox"/> Y <input type="checkbox"/> N                  D) <input checked="" type="checkbox"/> Y <input type="checkbox"/> N</p>
<p><b>6. The degree of obviousness of the presence or likely presence of contamination at the property, and the ability to detect the contamination by appropriate investigation (40CFR 312.31).</b>                  As the User of this PESA, based on your knowledge and experience related to the property, are there any obvious indicators that point to the presence or likely presence of contamination at the property?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  <input type="checkbox"/> NA/Unk</p>

Signature: 

Date: 2/4/19

APPENDIX C

ENVIRONMENTAL DATABASE REPORT

**Sam Estess Estates**

101 King Ranch Circle  
Canton, MS 39046

Inquiry Number: 5553589.2s  
February 05, 2019

## EDR Summary Radius Map Report



6 Armstrong Road, 4th floor  
Shelton, CT 06484  
Toll Free: 800.352.0050  
[www.edmet.com](http://www.edmet.com)



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Government Records Searched/Data Currency Tracking .....	GR-1

## GEOCHECK ADDENDUM

GeoCheck - Not Requested

*Thank you for your business.*  
Please contact EDR at 1-800-352-0050  
with any questions or comments.

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## EXECUTIVE SUMMARY

A search of available environmental records was conducted by Environmental Data Resources, Inc (EDR). The report was designed to assist parties seeking to meet the search requirements of EPA's Standards and Practices for All Appropriate Inquiries (40 CFR Part 312), the ASTM Standard Practice for Environmental Site Assessments (E 1527-13), the ASTM Standard Practice for Environmental Site Assessments for Forestland or Rural Property (E 2247-16), the ASTM Standard Practice for Limited Environmental Due Diligence: Transaction Screen Process (E 1528-14) or custom requirements developed for the evaluation of environmental risk associated with a parcel of real estate.

### TARGET PROPERTY INFORMATION

#### ADDRESS

101 KING RANCH CIRCLE  
CANTON, MS 39046

#### COORDINATES

Latitude (North): 32.6261800 - 32° 37' 34.24"  
Longitude (West): 90.0542430 - 90° 3' 15.27"  
Universal Tranverse Mercator: Zone 15  
UTM X (Meters): 776392.2  
UTM Y (Meters): 3613489.5  
Elevation: 220 ft. above sea level

### USGS TOPOGRAPHIC MAP ASSOCIATED WITH TARGET PROPERTY

Target Property: TP  
Source: U.S. Geological Survey  
  
Target Property: S  
Source: U.S. Geological Survey

### AERIAL PHOTOGRAPHY IN THIS REPORT

Portions of Photo from: 20140924, 20140923, 20140826  
Source: USDA

MAPPED SITES SUMMARY

Target Property Address:  
101 KING RANCH CIRCLE  
CANTON, MS 39046

Click on Map ID to see full detail.

MAP ID	SITE NAME	ADDRESS	DATABASE ACRONYMS	RELATIVE ELEVATION	DIST (ft. & mi.) DIRECTION
--------	-----------	---------	-------------------	--------------------	-------------------------------

NO MAPPED SITES FOUND

## **EXECUTIVE SUMMARY**

### **TARGET PROPERTY SEARCH RESULTS**

The target property was not listed in any of the databases searched by EDR.

### **SURROUNDING SITES: SEARCH RESULTS**

Surrounding sites were not identified.

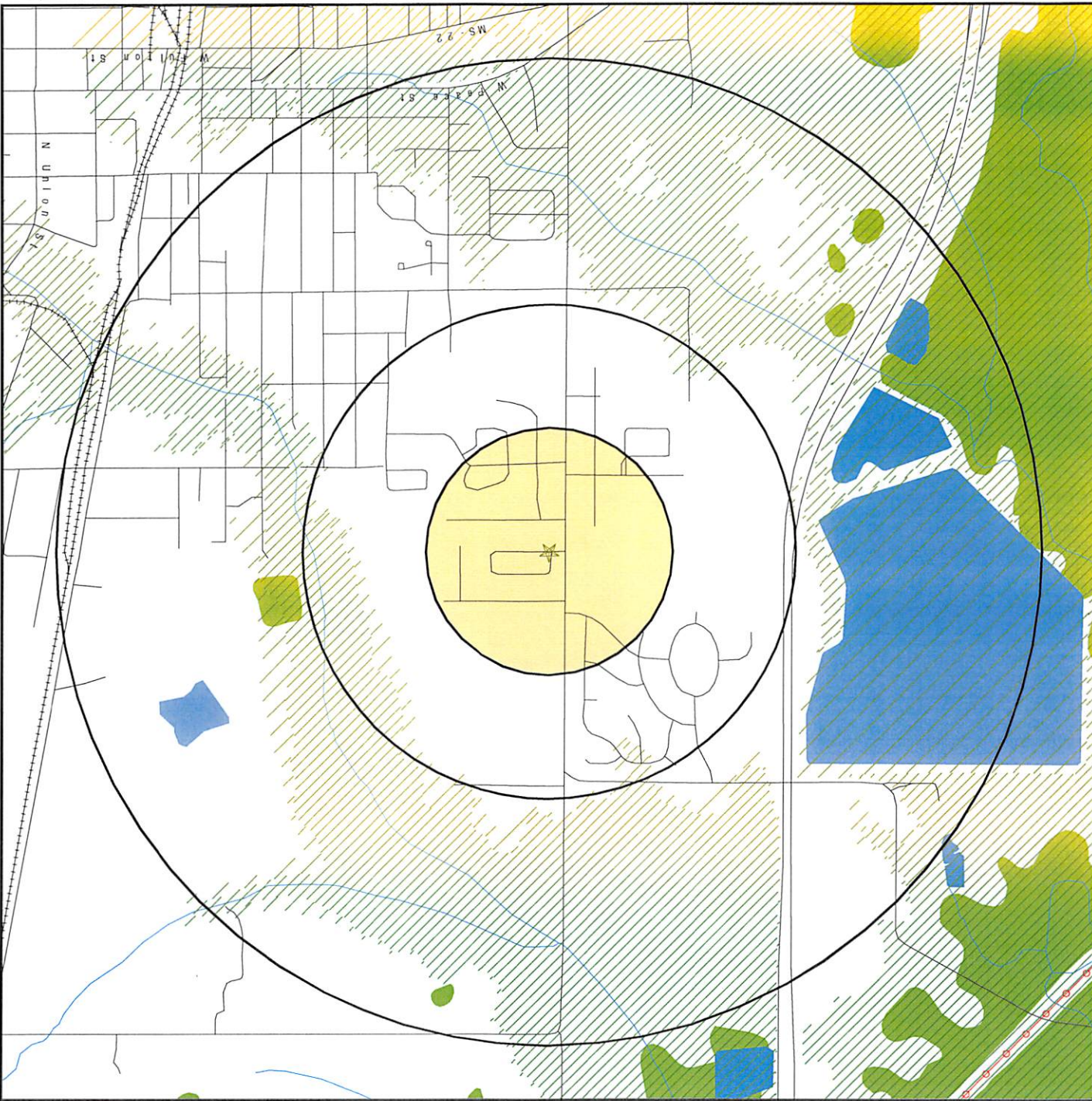
Unmappable (orphan) sites are not considered in the foregoing analysis.

Count: 1 records.

ORPHAN SUMMARY

<u>City</u>	<u>EDR ID</u>	<u>Site Name</u>	<u>Site Address</u>	<u>Zip</u>	<u>Database(s)</u>
CANTON	1003869762	JIMBO'S TRUCK STOP	HWY 22 & I-55	39046	SEMS-ARCHIVE

# OVERVIEW MAP - 5553589.2S



- Target Property
- Sites at elevations higher than or equal to the target property
- Sites at elevations lower than the target property
- Manufactured Gas Plants
- National Priority List Sites
- Dept. Defense Sites

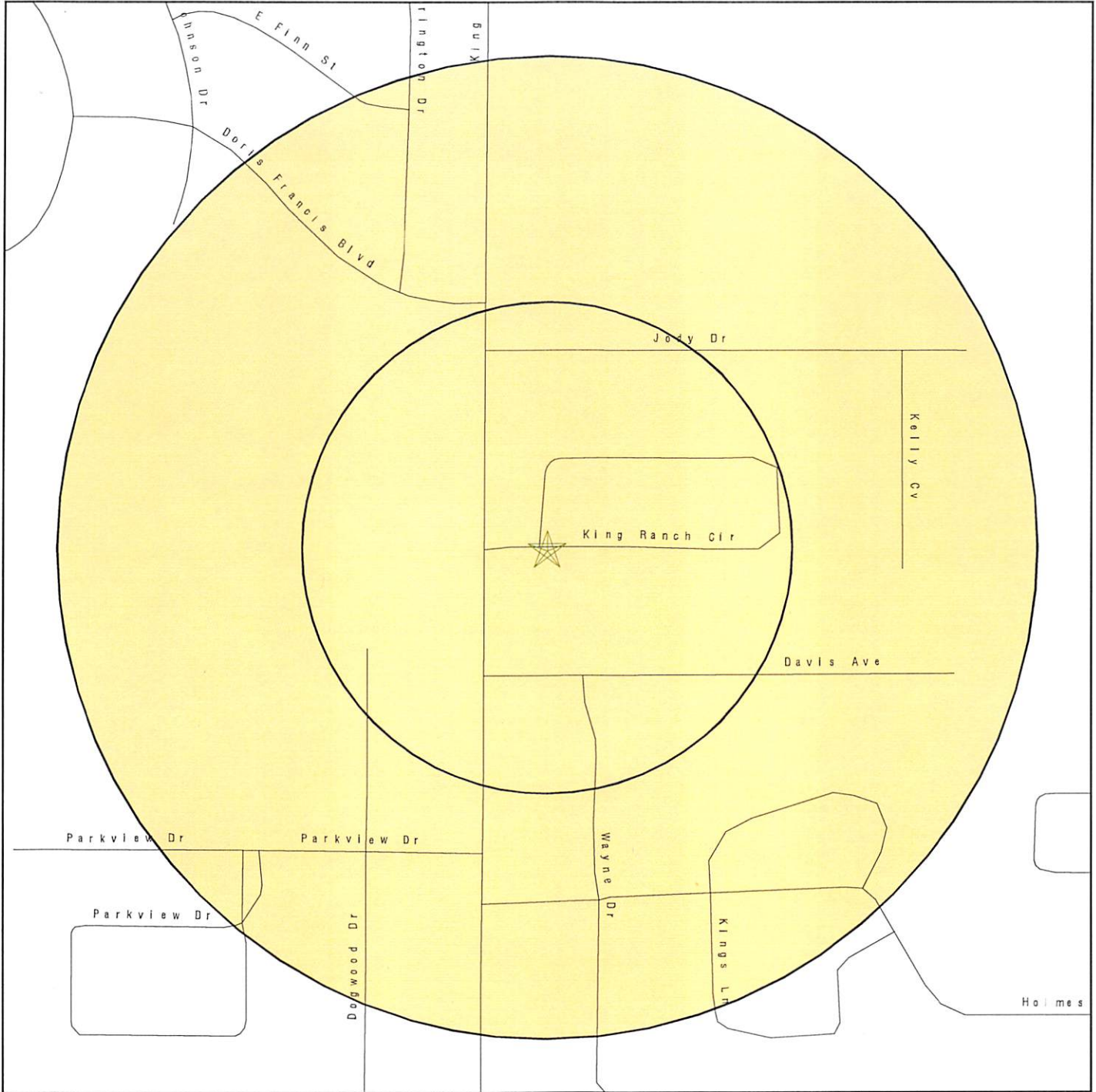
- Indian Reservations BIA
- Power transmission lines
- 100-year flood zone
- 500-year flood zone
- National Wetland Inventory
- State Wetlands

This report includes Interactive Map Layers to display and/or hide map information. The legend includes only those icons for the default map view.

**SITE NAME:** Sam Estess Estates  
**ADDRESS:** 101 King Ranch Circle  
**Canton MS 39046**  
**LAT/LONG:** 32.62618 / 90.054243

**CLIENT:** Spectrum Environmental Inc.  
**CONTACT:** Jamie Cox  
**INQUIRY #:** 5553589.2S  
**DATE:** February 05, 2019 2:37 pm

# DETAIL MAP - 5553589.2S



- ★ Target Property
- ▲ Sites at elevations higher than or equal to the target property
- ◆ Sites at elevations lower than the target property
- ▲ Manufactured Gas Plants
- Sensitive Receptors
- National Priority List Sites
- Dept. Defense Sites

- Indian Reservations BIA
- 100-year flood zone
- 500-year flood zone

This report includes Interactive Map Layers to display and/or hide map information. The legend includes only those icons for the default map view.

SITE NAME: Sam Estess Estates  
 ADDRESS: 101 King Ranch Circle  
 Canton MS 39046  
 LAT/LONG: 32.62618 / 90.054243

CLIENT: Spectrum Environmental Inc.  
 CONTACT: Jamie Cox  
 INQUIRY #: 5553589.2s  
 DATE: February 05, 2019 2:39 pm

## MAP FINDINGS SUMMARY

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
<b><u>STANDARD ENVIRONMENTAL RECORDS</u></b>								
<b><i>Federal NPL site list</i></b>								
NPL	1.000		0	0	0	0	NR	0
Proposed NPL	1.000		0	0	0	0	NR	0
NPL LIENS	1.000		0	0	0	0	NR	0
<b><i>Federal Delisted NPL site list</i></b>								
Delisted NPL	1.000		0	0	0	0	NR	0
<b><i>Federal CERCLIS list</i></b>								
FEDERAL FACILITY	0.500		0	0	0	NR	NR	0
SEMS	0.500		0	0	0	NR	NR	0
<b><i>Federal CERCLIS NFRAP site list</i></b>								
SEMS-ARCHIVE	0.500		0	0	0	NR	NR	0
<b><i>Federal RCRA CORRACTS facilities list</i></b>								
CORRACTS	1.000		0	0	0	0	NR	0
<b><i>Federal RCRA non-CORRACTS TSD facilities list</i></b>								
RCRA-TSDF	0.500		0	0	0	NR	NR	0
<b><i>Federal RCRA generators list</i></b>								
RCRA-LQG	0.250		0	0	NR	NR	NR	0
RCRA-SQG	0.250		0	0	NR	NR	NR	0
RCRA-CESQG	0.250		0	0	NR	NR	NR	0
<b><i>Federal institutional controls / engineering controls registries</i></b>								
LUCIS	0.500		0	0	0	NR	NR	0
US ENG CONTROLS	0.500		0	0	0	NR	NR	0
US INST CONTROL	0.500		0	0	0	NR	NR	0
<b><i>Federal ERNS list</i></b>								
ERNS	TP		NR	NR	NR	NR	NR	0
<b><i>State- and tribal - equivalent CERCLIS</i></b>								
SHWS	1.000		0	0	0	0	NR	0
<b><i>State and tribal landfill and/or solid waste disposal site lists</i></b>								
SWF/LF	0.500		0	0	0	NR	NR	0
DEBRIS	0.500		0	0	0	NR	NR	0
<b><i>State and tribal leaking storage tank lists</i></b>								
LUST	0.500		0	0	0	NR	NR	0
INDIAN LUST	0.500		0	0	0	NR	NR	0
<b><i>State and tribal registered storage tank lists</i></b>								
FEMA UST	0.250		0	0	NR	NR	NR	0



## MAP FINDINGS SUMMARY

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
UST	0.250		0	0	NR	NR	NR	0
AST	0.250		0	0	NR	NR	NR	0
INDIAN UST	0.250		0	0	NR	NR	NR	0
<b>State and tribal institutional control / engineering control registries</b>								
ENG CONTROLS	0.500		0	0	0	NR	NR	0
INST CONTROL	0.500		0	0	0	NR	NR	0
<b>State and tribal voluntary cleanup sites</b>								
INDIAN VCP	0.500		0	0	0	NR	NR	0
VCP	0.500		0	0	0	NR	NR	0
<b>State and tribal Brownfields sites</b>								
BROWNFIELDS	0.500		0	0	0	NR	NR	0
<b>ADDITIONAL ENVIRONMENTAL RECORDS</b>								
<b>Local Brownfield lists</b>								
US BROWNFIELDS	0.500		0	0	0	NR	NR	0
<b>Local Lists of Landfill / Solid Waste Disposal Sites</b>								
SWTIRE	0.500		0	0	0	NR	NR	0
SWRCY	0.500		0	0	0	NR	NR	0
INDIAN ODI	0.500		0	0	0	NR	NR	0
DEBRIS REGION 9	0.500		0	0	0	NR	NR	0
ODI	0.500		0	0	0	NR	NR	0
IHS OPEN DUMPS	0.500		0	0	0	NR	NR	0
<b>Local Lists of Hazardous waste / Contaminated Sites</b>								
US HIST CDL	TP		NR	NR	NR	NR	NR	0
US CDL	TP		NR	NR	NR	NR	NR	0
<b>Local Land Records</b>								
LIENS 2	TP		NR	NR	NR	NR	NR	0
<b>Records of Emergency Release Reports</b>								
HMIRS	TP		NR	NR	NR	NR	NR	0
<b>Other Ascertainable Records</b>								
RCRA NonGen / NLR	0.250		0	0	NR	NR	NR	0
FUDS	1.000		0	0	0	0	NR	0
DOD	1.000		0	0	0	0	NR	0
SCRD DRYCLEANERS	0.500		0	0	0	NR	NR	0
US FIN ASSUR	TP		NR	NR	NR	NR	NR	0
EPA WATCH LIST	TP		NR	NR	NR	NR	NR	0
2020 COR ACTION	0.250		0	0	NR	NR	NR	0
TSCA	TP		NR	NR	NR	NR	NR	0

## MAP FINDINGS SUMMARY

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
TRIS	TP		NR	NR	NR	NR	NR	0
SSTS	TP		NR	NR	NR	NR	NR	0
ROD	1.000		0	0	0	0	NR	0
RMP	TP		NR	NR	NR	NR	NR	0
RAATS	TP		NR	NR	NR	NR	NR	0
PRP	TP		NR	NR	NR	NR	NR	0
PADS	TP		NR	NR	NR	NR	NR	0
ICIS	TP		NR	NR	NR	NR	NR	0
FTTS	TP		NR	NR	NR	NR	NR	0
MLTS	TP		NR	NR	NR	NR	NR	0
COAL ASH DOE	TP		NR	NR	NR	NR	NR	0
COAL ASH EPA	0.500		0	0	0	NR	NR	0
PCB TRANSFORMER	TP		NR	NR	NR	NR	NR	0
RADINFO	TP		NR	NR	NR	NR	NR	0
HIST FTTS	TP		NR	NR	NR	NR	NR	0
DOT OPS	TP		NR	NR	NR	NR	NR	0
CONSENT	1.000		0	0	0	0	NR	0
INDIAN RESERV	1.000		0	0	0	0	NR	0
FUSRAP	1.000		0	0	0	0	NR	0
UMTRA	0.500		0	0	0	NR	NR	0
LEAD SMELTERS	TP		NR	NR	NR	NR	NR	0
US AIRS	TP		NR	NR	NR	NR	NR	0
US MINES	0.250		0	0	NR	NR	NR	0
ABANDONED MINES	0.250		0	0	NR	NR	NR	0
FINDS	TP		NR	NR	NR	NR	NR	0
DOCKET HWC	TP		NR	NR	NR	NR	NR	0
UXO	1.000		0	0	0	0	NR	0
ECHO	TP		NR	NR	NR	NR	NR	0
FUELS PROGRAM	0.250		0	0	NR	NR	NR	0
AIRS	TP		NR	NR	NR	NR	NR	0
ASBESTOS	TP		NR	NR	NR	NR	NR	0
DRYCLEANERS	0.250		0	0	NR	NR	NR	0
NPDES	TP		NR	NR	NR	NR	NR	0
PERMITS	TP		NR	NR	NR	NR	NR	0
UIC	TP		NR	NR	NR	NR	NR	0
<b><u>EDR HIGH RISK HISTORICAL RECORDS</u></b>								
<i>EDR Exclusive Records</i>								
EDR MGP	1.000		0	0	0	0	NR	0
EDR Hist Auto	0.125		0	NR	NR	NR	NR	0
EDR Hist Cleaner	0.125		0	NR	NR	NR	NR	0
<b><u>EDR RECOVERED GOVERNMENT ARCHIVES</u></b>								
<i>Exclusive Recovered Govt. Archives</i>								
RGA HWS	TP		NR	NR	NR	NR	NR	0
RGA LF	TP		NR	NR	NR	NR	NR	0
RGA LUST	TP		NR	NR	NR	NR	NR	0
- Totals --		0	0	0	0	0	0	0

## MAP FINDINGS SUMMARY

<u>Database</u>	<u>Search Distance (Miles)</u>	<u>Target Property</u>	<u>&lt; 1/8</u>	<u>1/8 - 1/4</u>	<u>1/4 - 1/2</u>	<u>1/2 - 1</u>	<u>&gt; 1</u>	<u>Total Plotted</u>
-----------------	--	----------------------------	-----------------	------------------	------------------	----------------	---------------	--------------------------

**NOTES:**

TP = Target Property

NR = Not Requested at this Search Distance

Sites may be listed in more than one database

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s)

EDR ID Number  
EPA ID Number

NO SITES FOUND

# GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

St	Acronym	Full Name	Government Agency	Gov Date	Arvl. Date	Active Date
MS	AIRS	Air Quality Information Listing	Department of Environmental Quality	10/15/2018	10/18/2018	11/26/2018
MS	ASBESTOS	Asbestos Project Listing	Department of Environmental Quality	08/31/2018	09/04/2018	10/11/2018
MS	AST	Aboveground Storage Tanks	Department of Agriculture & Commerce	09/10/2018	09/11/2018	10/11/2018
MS	BROWNFIELDS	Uncontrolled Sites List	Department of Environmental Quality	09/04/2018	09/26/2018	10/11/2018
MS	DEBRIS	Debris Site Locations Listing	Department of Environmental Quality	06/17/2008	06/17/2008	07/31/2008
MS	DRYCLEANERS	Drycleaner Facilities Listing	Department of Environmental Quality	05/22/2018	06/05/2018	06/28/2018
MS	ENG CONTROLS	Sites with Engineering Controls	Department of Environmental Quality	09/04/2018	09/26/2018	10/11/2018
MS	INST CONTROL	Sites with Institutional Controls	Department of Environmental Quality	09/04/2018	09/26/2018	10/11/2018
MS	LUST	Leaking Underground Storage Tank Database	Department of Environmental Quality	09/25/2018	09/26/2018	10/11/2018
MS	NPDES	Industrial & Municipal NPDES Facilities	Department of Environmental Quality	10/09/2018	10/11/2018	11/20/2018
MS	PERMITS	Environmental Site Information System Listing	The Office of Pollution Control	10/09/2018	10/11/2018	11/20/2018
MS	RGA HWS	Recovered Government Archive State Hazardous Waste Facilitie	Department of Environmental Quality		07/01/2013	01/08/2014
MS	RGA LF	Recovered Government Archive Solid Waste Facilities List	Department of Environmental Quality		07/01/2013	01/20/2014
MS	RGA LUST	Recovered Government Archive Leaking Underground Storage Tan	Department of Environmental Quality		07/01/2013	01/03/2014
MS	SHWS	CERCLA/Uncontrolled Sites File List	Department of Environmental Quality	09/04/2018	09/26/2018	10/11/2018
MS	SWFLF	Solid Waste Landfills	Department of Environmental Quality	04/12/2018	05/23/2018	06/28/2018
MS	SWRCY	Mississippi Recycling Directory	Department of Environmental Quality	08/29/2018	11/19/2018	12/19/2018
MS	SWTIRE	Commercial Waste Tire Haulers	Department of Environmental Quality	09/21/2018	09/25/2018	10/11/2018
MS	UIC	UIC Information	State Oil & Gas Board	11/16/2018	11/16/2018	12/13/2018
MS	UST	Underground Storage Tanks	Department of Environmental Quality	09/25/2018	09/26/2018	10/11/2018
MS	VCP	Voluntary Evaluation Program Sites	Department of Environmental Quality	09/04/2018	09/26/2018	10/11/2018
US	2020 COR ACTION	2020 Corrective Action Program List	Environmental Protection Agency	09/30/2017	05/08/2018	07/20/2018
US	ABANDONED MINES	Abandoned Mines	Department of Interior	09/10/2018	09/11/2018	09/14/2018
US	BRS	Biennial Reporting System	EPA/NTIS	12/31/2015	02/22/2017	09/28/2017
US	COAL ASH DOE	Steam-Electric Plant Operation Data	Department of Energy	12/31/2005	08/07/2009	10/22/2009
US	COAL ASH EPA	Coal Combustion Residues Surface Impoundments List	Environmental Protection Agency	07/01/2014	09/10/2014	10/20/2014
US	CONSENT	Superfund (CERCLA) Consent Decrees	Department of Justice, Consent Decree Library	09/30/2018	10/12/2018	12/07/2018
US	CORRACTS	Corrective Action Report	EPA	03/01/2018	03/28/2018	06/22/2018
US	DEBRIS REGION 9	Torres Martinez Reservation Illegal Dump Site Locations	EPA, Region 9	01/12/2009	05/07/2009	09/21/2009
US	DOCKET HWC	Hazardous Waste Compliance Docket Listing	Environmental Protection Agency	05/31/2018	07/26/2018	10/05/2018
US	DOD	Department of Defense Sites	USGS	12/31/2005	11/10/2006	01/11/2007
US	DOT OPS	Incident and Accident Data	Department of Transportation, Office of Pipeli	10/01/2018	10/30/2018	01/18/2019
US	Delisted NPL	National Priority List Deletions	EPA	12/12/2018	12/28/2018	01/11/2019
US	ECHO	Enforcement & Compliance History Information	Environmental Protection Agency	09/02/2018	09/05/2018	09/14/2018
US	EDR Hist Auto	EDR Exclusive Historical Auto Stations	EDR, Inc.			
US	EDR Hist Cleaner	EDR Exclusive Historical Cleaners	EDR, Inc.			
US	EDR MGP	EDR Proprietary Manufactured Gas Plants	EDR, Inc.			
US	EPA WATCH LIST	EPA WATCH LIST	Environmental Protection Agency	08/30/2013	03/21/2014	06/17/2014
US	ERNS	Emergency Response Notification System	National Response Center, United States Coast	09/24/2018	09/25/2018	11/09/2018
US	FEDERAL FACILITY	Federal Facility Site Information listing	Environmental Protection Agency	11/07/2016	01/05/2017	04/07/2017
US	FEDLAND	Federal and Indian Lands	U.S. Geological Survey	12/31/2005	02/06/2006	01/11/2007
US	FEMA UST	Underground Storage Tank Listing	FEMA	05/15/2017	05/30/2017	10/13/2017
US	FINDS	Facility Index System/Facility Registry System	EPA	11/15/2018	12/05/2018	01/11/2019
US	FTTS	FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fu	EPA/Office of Prevention, Pesticides and Toxi	04/09/2009	04/16/2009	05/11/2009
US	FTTS INSP	FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fu	EPA	04/09/2009	04/16/2009	05/11/2009
US	FUDS	Formerly Used Defense Sites	U.S. Army Corps of Engineers	01/31/2015	07/08/2015	10/13/2015
US	FUELS PROGRAM	EPA Fuels Program Registered Listing	EPA	08/22/2018	08/22/2018	10/05/2018

## GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

St	Acronym	Full Name	Government Agency	Gov Date	Arvl. Date	Active Date
US	FUSRAP	Formerly Utilized Sites Remedial Action Program	Department of Energy	08/08/2017	09/11/2018	09/14/2018
US	HIST FTTS	FIFRA/TSCA Tracking System Administrative Case Listing	Environmental Protection Agency	10/19/2006	03/01/2007	04/10/2007
US	HIST FTTS INSP	FIFRA/TSCA Tracking System Inspection & Enforcement Case Lis	Environmental Protection Agency	10/19/2006	03/01/2007	04/10/2007
US	HMIRS	Hazardous Materials Information Reporting System	U.S. Department of Transportation	03/26/2018	03/27/2018	06/08/2018
US	ICIS	Integrated Compliance Information System	Environmental Protection Agency	11/18/2016	11/23/2016	02/10/2017
US	IHS OPEN DUMPS	Open Dumps on Indian Land	Department of Health & Human Serivces, Indian	04/01/2014	08/06/2014	01/29/2015
US	INDIAN LUST R1	Leaking Underground Storage Tanks on Indian Land	EPA Region 1	04/13/2018	05/18/2018	07/20/2018
US	INDIAN LUST R10	Leaking Underground Storage Tanks on Indian Land	EPA Region 10	04/12/2018	05/18/2018	07/20/2018
US	INDIAN LUST R4	Leaking Underground Storage Tanks on Indian Land	EPA Region 4	05/08/2018	05/18/2018	07/20/2018
US	INDIAN LUST R5	Leaking Underground Storage Tanks on Indian Land	EPA, Region 5	04/12/2018	05/18/2018	07/20/2018
US	INDIAN LUST R6	Leaking Underground Storage Tanks on Indian Land	EPA Region 6	04/01/2018	05/18/2018	07/20/2018
US	INDIAN LUST R7	Leaking Underground Storage Tanks on Indian Land	EPA Region 7	04/24/2018	05/18/2018	07/20/2018
US	INDIAN LUST R8	Leaking Underground Storage Tanks on Indian Land	EPA Region 8	04/25/2018	05/18/2018	07/20/2018
US	INDIAN LUST R9	Leaking Underground Storage Tanks on Indian Land	Environmental Protection Agency	04/10/2018	05/18/2018	07/20/2018
US	INDIAN ODI	Report on the Status of Open Dumps on Indian Lands	Environmental Protection Agency	12/31/1998	12/03/2007	01/24/2008
US	INDIAN RESERV	Indian Reservations	USGS	12/31/2014	07/14/2015	01/10/2017
US	INDIAN UST R1	Underground Storage Tanks on Indian Land	EPA, Region 1	04/13/2018	05/18/2018	07/20/2018
US	INDIAN UST R10	Underground Storage Tanks on Indian Land	EPA Region 10	04/12/2018	05/18/2018	07/20/2018
US	INDIAN UST R4	Underground Storage Tanks on Indian Land	EPA Region 4	05/08/2018	05/18/2018	07/20/2018
US	INDIAN UST R5	Underground Storage Tanks on Indian Land	EPA Region 5	04/12/2018	05/18/2018	07/20/2018
US	INDIAN UST R6	Underground Storage Tanks on Indian Land	EPA Region 6	04/01/2018	05/18/2018	07/20/2018
US	INDIAN UST R7	Underground Storage Tanks on Indian Land	EPA Region 7	04/24/2018	05/18/2018	07/20/2018
US	INDIAN UST R8	Underground Storage Tanks on Indian Land	EPA Region 8	04/25/2018	05/18/2018	07/20/2018
US	INDIAN UST R9	Underground Storage Tanks on Indian Land	EPA Region 9	04/10/2018	05/18/2018	07/20/2018
US	INDIAN VCP R1	Voluntary Cleanup Priority Listing	EPA, Region 1	07/27/2015	09/29/2015	02/18/2016
US	INDIAN VCP R7	Voluntary Cleanup Priority Lisiting	EPA, Region 7	03/20/2008	04/22/2008	05/19/2008
US	LEAD SMELTER 1	Lead Smelter Sites	Environmental Protection Agency	12/12/2018	12/28/2018	01/11/2019
US	LEAD SMELTER 2	Lead Smelter Sites	American Journal of Public Health	04/05/2001	10/27/2010	12/02/2010
US	LIENS 2	CERCLA Lien Information	Environmental Protection Agency	12/12/2018	12/28/2018	01/11/2019
US	LUCIS	Land Use Control Information System	Department of the Navy	10/17/2018	10/25/2018	12/07/2018
US	MLTS	Material Licensing Tracking System	Nuclear Regulatory Commission	08/30/2016	09/08/2016	10/21/2016
US	NPL	National Priority List	EPA	12/12/2018	12/28/2018	01/11/2019
US	NPL LIENS	Federal Superfund Liens	EPA	10/15/1991	02/02/1994	03/30/1994
US	ODI	Open Dump Inventory	Environmental Protection Agency	06/30/1985	08/09/2004	09/17/2004
US	PADS	PCB Activity Database System	EPA	09/14/2018	10/11/2018	12/07/2018
US	PCB TRANSFORMER	PCB Transformer Registration Database	Environmental Protection Agency	05/24/2017	11/30/2017	12/15/2017
US	PRP	Potentially Responsible Parties	EPA	08/13/2018	10/04/2018	11/09/2018
US	Proposed NPL	Proposed National Priority List Sites	EPA	12/12/2018	12/28/2018	01/11/2019
US	RAATS	RCRA Administrative Action Tracking System	EPA	04/17/1995	07/03/1995	08/07/1995
US	RADINFO	Radiation Information Database	Environmental Protection Agency	10/02/2018	10/03/2018	11/09/2018
US	RCRA NonGen / NLR	RCRA - Non Generators / No Longer Regulated	Environmental Protection Agency	03/01/2018	03/28/2018	06/22/2018
US	RCRA-CESQG	RCRA - Conditionally Exempt Small Quantity Generators	Environmental Protection Agency	03/01/2018	03/28/2018	06/22/2018
US	RCRA-LQG	RCRA - Large Quantity Generators	Environmental Protection Agency	03/01/2018	03/28/2018	06/22/2018
US	RCRA-SQG	RCRA - Small Quantity Generators	Environmental Protection Agency	03/01/2018	03/28/2018	06/22/2018
US	RCRA-TSDF	RCRA - Treatment, Storage and Disposal	Environmental Protection Agency	03/01/2018	03/28/2018	06/22/2018
US	RMP	Risk Management Plans	Environmental Protection Agency	10/26/2018	11/06/2018	01/11/2019
US	ROD	Records Of Decision	EPA	12/12/2018	12/28/2018	01/11/2019

## GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

St	Acronym	Full Name	Government Agency	Gov Date	Arvl. Date	Active Date
US	SCRD DRYCLEANERS	State Coalition for Remediation of Drycleaners Listing	Environmental Protection Agency	01/01/2017	02/03/2017	04/07/2017
US	SEMS	Superfund Enterprise Management System	EPA	12/12/2018	12/28/2018	01/11/2019
US	SEMS-ARCHIVE	Superfund Enterprise Management System Archive	EPA	12/13/2018	12/28/2018	01/11/2019
US	SSTS	Section 7 Tracking Systems	EPA	12/31/2009	12/10/2010	02/25/2011
US	TRIS	Toxic Chemical Release Inventory System	EPA	12/31/2016	01/10/2018	01/12/2018
US	TSCA	Toxic Substances Control Act	EPA	12/31/2016	06/21/2017	01/05/2018
US	UMTRA	Uranium Mill Tailings Sites	Department of Energy	06/23/2017	10/11/2017	11/03/2017
US	US AIRS (AFS)	Aerometric Information Retrieval System Facility Subsystem (	EPA	10/12/2016	10/26/2016	02/03/2017
US	US AIRS MINOR	Air Facility System Data	EPA	10/12/2016	10/26/2016	02/03/2017
US	US BROWNFIELDS	A Listing of Brownfields Sites	Environmental Protection Agency	12/17/2018	12/18/2018	01/11/2019
US	US CDL	Clandestine Drug Labs	Drug Enforcement Administration	09/21/2018	09/21/2018	11/09/2018
US	US ENG CONTROLS	Engineering Controls Sites List	Environmental Protection Agency	07/31/2018	08/28/2018	09/14/2018
US	US FIN ASSUR	Financial Assurance Information	Environmental Protection Agency	08/31/2018	09/25/2018	11/09/2018
US	US HIST CDL	National Clandestine Laboratory Register	Drug Enforcement Administration	09/21/2018	09/21/2018	11/09/2018
US	US INST CONTROL	Sites with Institutional Controls	Environmental Protection Agency	07/31/2018	08/28/2018	09/14/2018
US	US MINES	Mines Master Index File	Department of Labor, Mine Safety and Health A	08/01/2018	08/29/2018	10/05/2018
US	US MINES 2	Ferrous and Nonferrous Metal Mines Database Listing	USGS	12/05/2005	02/29/2008	04/18/2008
US	US MINES 3	Active Mines & Mineral Plants Database Listing	USGS	04/14/2011	06/08/2011	09/13/2011
US	UXO	Unexploded Ordnance Sites	Department of Defense	09/30/2017	06/19/2018	09/14/2018
NY	NY MANIFEST	Facility and Manifest Data	Department of Environmental Conservation	10/01/2018	10/31/2018	12/20/2018
PA	PA MANIFEST	Manifest Information	Department of Environmental Protection	12/31/2017	10/23/2018	11/27/2018
US	AHA Hospitals	Sensitive Receptor: AHA Hospitals	American Hospital Association, Inc.			
US	Medical Centers	Sensitive Receptor: Medical Centers	Centers for Medicare & Medicaid Services			
US	Nursing Homes	Sensitive Receptor: Nursing Homes	National Institutes of Health			
US	Public Schools	Sensitive Receptor: Public Schools	National Center for Education Statistics			
US	Private Schools	Sensitive Receptor: Private Schools	National Center for Education Statistics			
MS	Daycare Centers	Sensitive Receptor: Child Care Listing	Department of Health			
US	Flood Zones	100-year and 500-year flood zones	Emergency Management Agency (FEMA)			
US	NWI	National Wetlands Inventory	U.S. Fish and Wildlife Service			
MS	State Wetlands	Wetland Inventory	US Fish & Wildlife Service			
US	Topographic Map		U.S. Geological Survey			
US	Oil/Gas Pipelines		PennWell Corporation			
US	Electric Power Transmission Line Data		PennWell Corporation			

# GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

**St**   **Acronym**   **Full Name**   **Government Agency**   **Gov Date**   **Arvl. Date**   **Active Date**


**STREET AND ADDRESS INFORMATION**

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APPENDIX D

FIRE INSURANCE MAP REPORT



Sam Estess Estates  
101 King Ranch Road  
Canton, MS 39046

Inquiry Number: 4990185.2  
July 11, 2017

## Certified Sanborn® Map Report



6 Armstrong Road, 4th floor  
Shelton, CT 06484  
Toll Free: 800.352.0050  
[www.edrnet.com](http://www.edrnet.com)

APPENDIX E

HISTORICAL AERIAL PHOTOGRAPHS



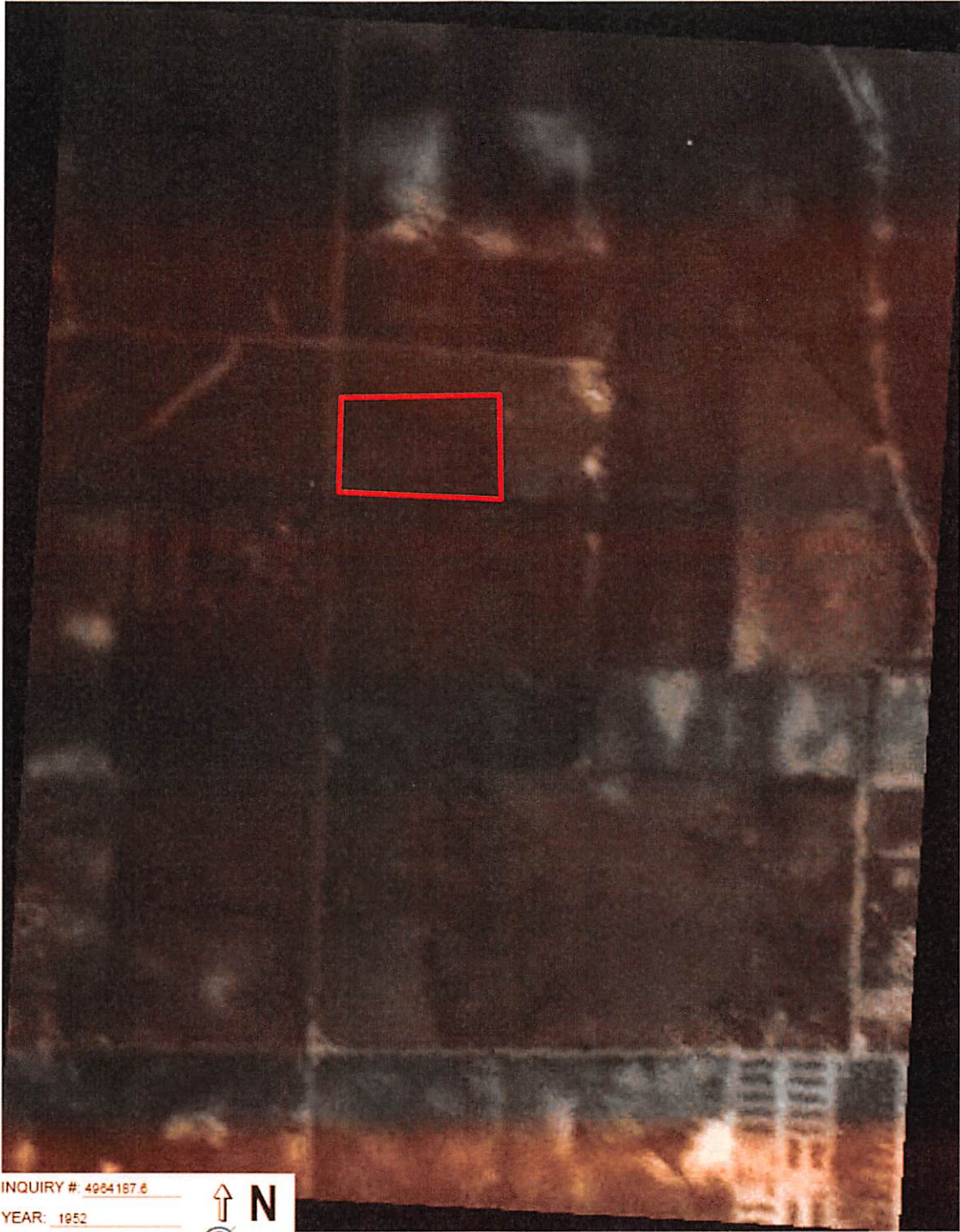
Source: Image Courtesy of EDR. Image taken in 1949.  
 Approximate site location outlined in red.



NO.	DATE	REVISION NOTE	BY

Drawn By:	Project #:
AH	2735
Checked By:	Date:
TT	2/15/2019
Project Mgr:	File Name:
JC	2735-147-01

TITLE
Historical Aerial: 1949



INQUIRY # 4964167.6  
 YEAR: 1952



Source: Image Courtesy of EDR. Image taken in 1952.  
 Approximate site location outlined in red.



NO.	DATE	REVISION NOTE	BY

Drawn By:	Project #
AH	2735
Checked By:	Date
TT	2/15/2019
Project Mgr.:	File Name
JC	2735-147-01

TITLE
Historical Aerial: 1952



Source: Image Courtesy of EDR. Image taken in 1971.  
 Approximate site location outlined in red.



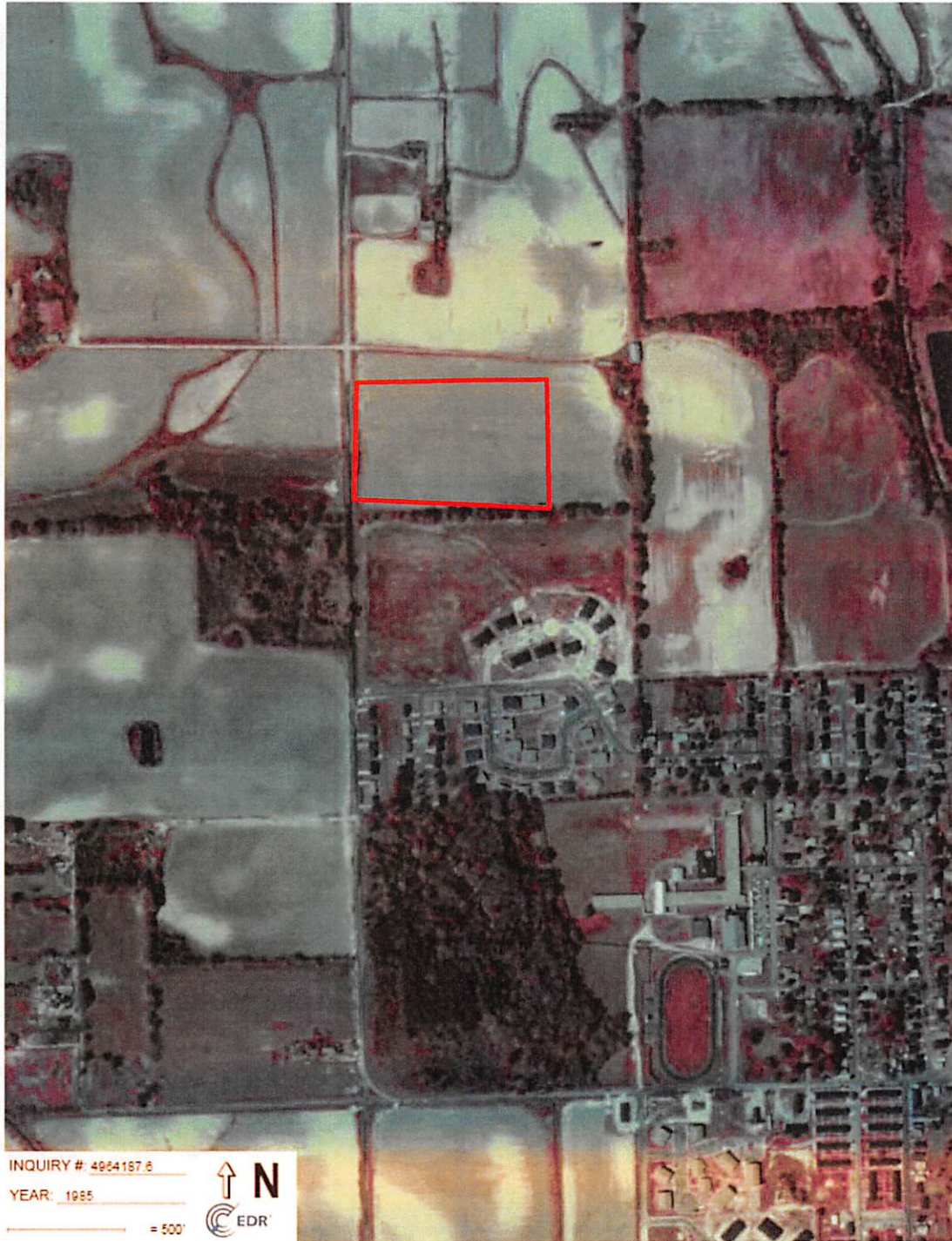
NO.	DATE	REVISION NOTE	BY

Drawn By:	AH	Project #	2735
Checked By:	TT	Date:	2/15/2019
Designed By:	JC	File Name:	2735-147.01

  
**SPECTRUM**  
 Solutions to Your Environmental Challenges

85 Spectrum Cove  
 Alabaster, AL 35007  
 O - 205-684-2000  
 F-205-684-2142

TITLE
Historical Aerial: 1971



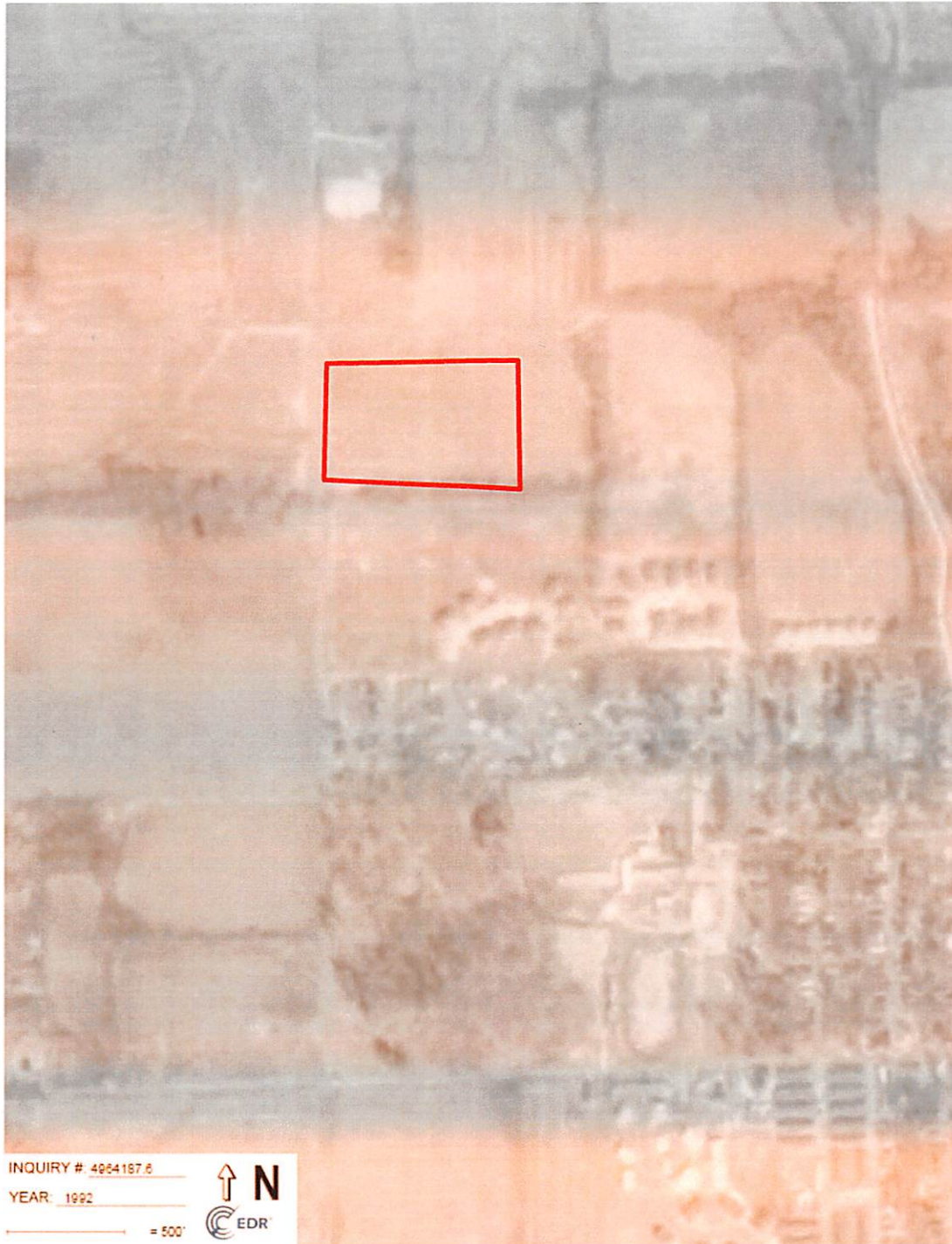
Source: Image Courtesy of EDR. Image taken in 1985.  
 Approximate site location outlined in red.



NO.	DATE	REVISION NOTE	BY

Drawn By:	Project #:
AH	2735
Checked By:	Date:
TT	2/15/2019
Project Mgr.:	File Name:
JC	2735-147-01

TITLE
Historical Aerial: 1985



INQUIRY # 4964187.6  
 YEAR 1992  
 = 500'



Source: Image Courtesy of EDR. Image taken in 1992.  
 Approximate site location outlined in red.



NO.	DATE	REVISION NOTE	BY


Drawn By:	Project #:
AH	2735
Checked By:	Date:
TT	2/15/2019
Project Mgr:	File Name:
JC	2735-147-01

**SPECTRUM**  
 Solutions to Your Environmental Challenges  
 85 Spectrum Cove  
 Alabaster, AL 35007  
 O - 205-664-2000  
 F-205-664-2142

TITLE
Historical Aerial: 1992





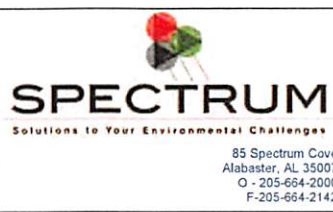
INQUIRY # 4964187.6  
 YEAR: 1996  
 = 500' 

Source: Image Courtesy of EDR. Image taken in 1996.  
 Approximate site location outlined in red.

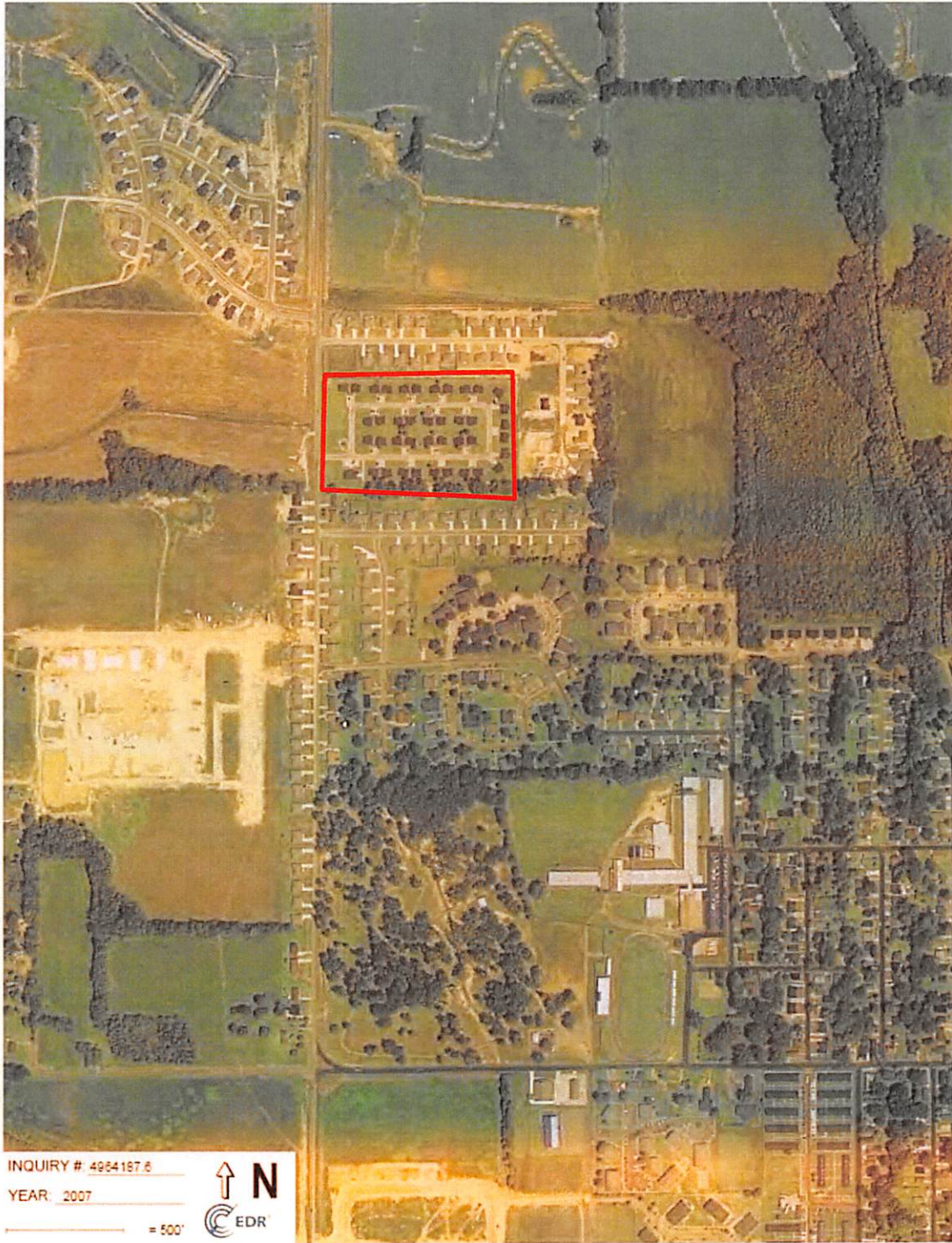


NO.	DATE	REVISION NOTE	BY

Drawn By:	Project #:
AH	2735
Checked By:	Date:
TT	2/15/2019
Project Mgr.:	File Name:
JC	2735-147-01



TITLE
Historical Aerial: 1996



Source: Image Courtesy of EDR. Image taken in 2007.  
 Approximate site location outlined in red.




NO.	DATE	REVISION NOTE	BY

Drawn By:	Project #
AH	2735
Checked By:	Date:
TT	2/15/2019
Project Mgr:	File Name:
JC	2735-147-01

**SPECTRUM**  
 Solutions to Your Environmental Challenges  
 85 Spectrum Cove  
 Alabaster, AL 35007  
 O - 205-664-2000  
 F-205-664-2142

TITLE
Historical Aerial: 2007



INQUIRY # 4984187.6  
 YEAR: 2009  
 = 500' 

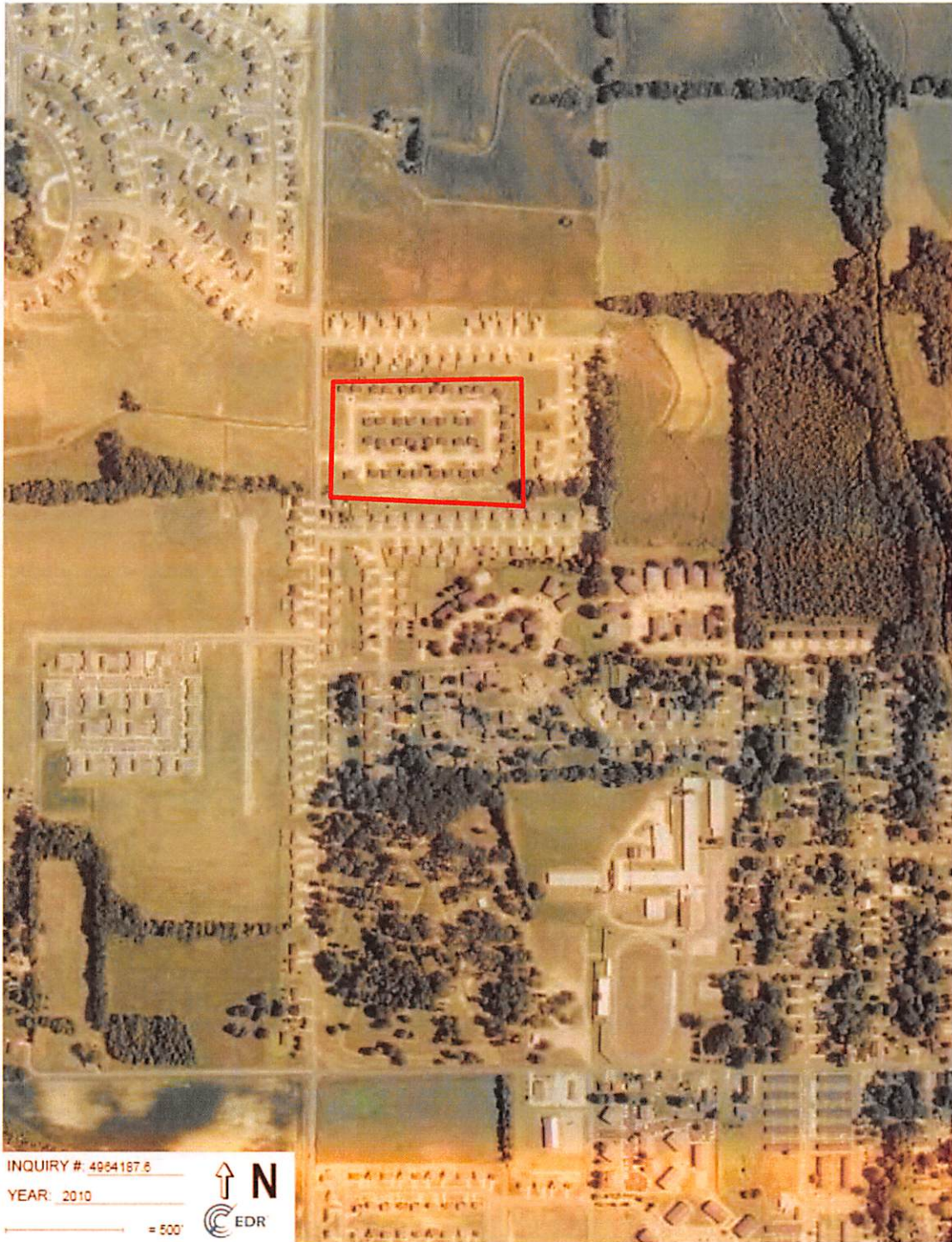
Source: Image Courtesy of EDR. Image taken in 2009.  
 Approximate site location outlined in red.



NO.	DATE	REVISION NOTE	BY

Drawn By:	Project #
AH	2735
Checked By:	Date
TT	2/15/2019
Project Mgr:	File Name:
JC	2735-147-01

TITLE
Historical Aerial: 2009



INQUIRY # 4964187.6

YEAR: 2010

= 500'



Source: Image Courtesy of EDR. Image taken in 2010.  
Approximate site location outlined in red.



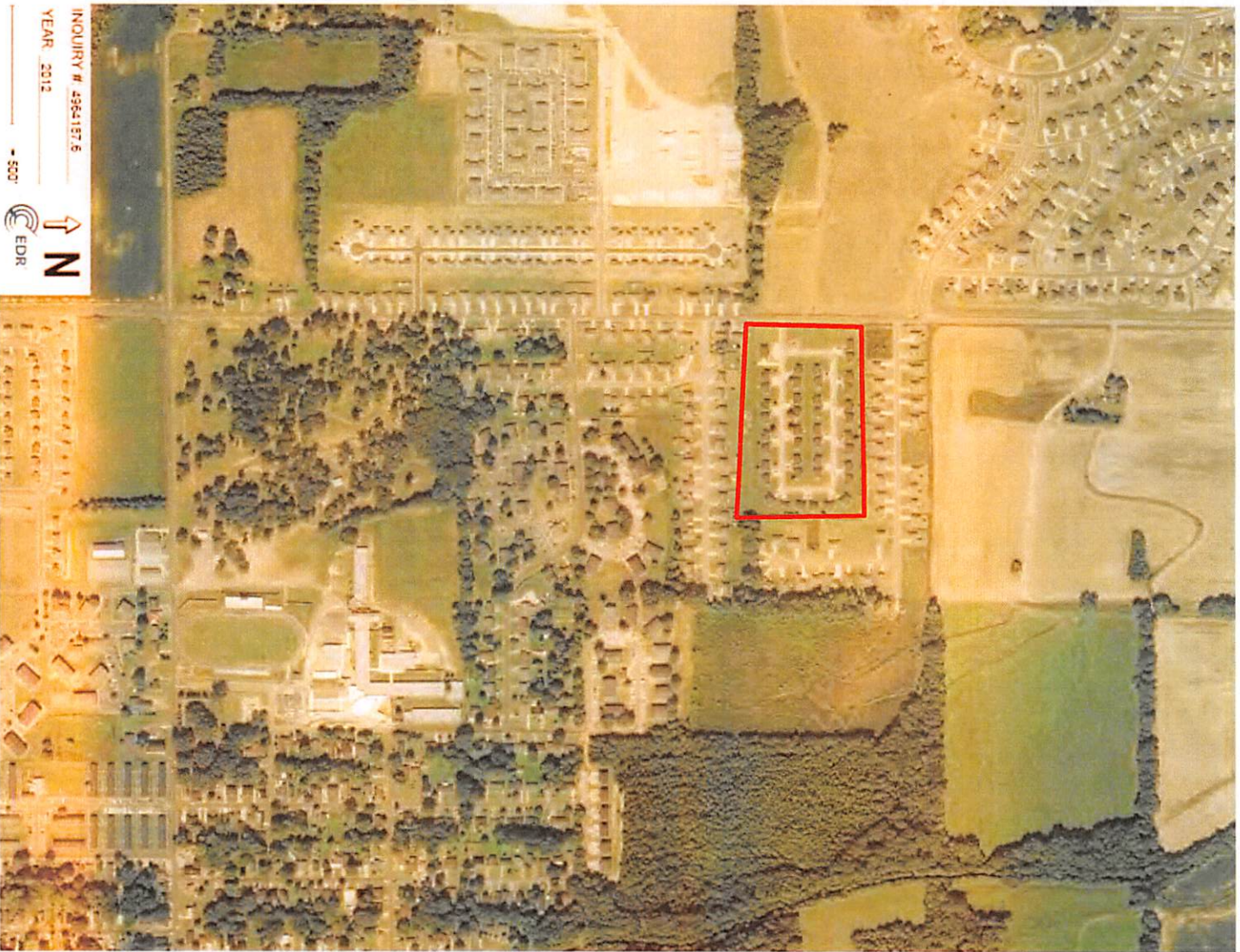
NO.	DATE	REVISION NOTE	BY

Drawn By:	Project #:
AH	2735
Checked By:	Date:
TT	2/15/2019
Project Mgr:	File Name:
JC	2735-147-01

**SPECTRUM**  
Solutions to Your Environmental Challenges

85 Spectrum Cove  
Alabaster, AL 35007  
O - 205-664-2000  
F-205-664-2142

TITLE
Historical Aerial: 2010



Source: Image Courtesy of EDR. Image taken in 2012.  
 Approximate site location outlined in red.



NO.	DATE	REVISION NOTE	BY

Drawn By	Project #
AH	2735
Checked By	Date
TI	2/15/2019
Project Mgr.	File Name
JC	2735-147-01

  
**SPECTRUM**  
 Solutions to Your Environmental Challenges

85 Spectrum Cove  
 Abbeville, AL 36007  
 O - 205-664-2000  
 F-205-664-2142

TITLE	Historical Aerial: 2012
-------	-------------------------

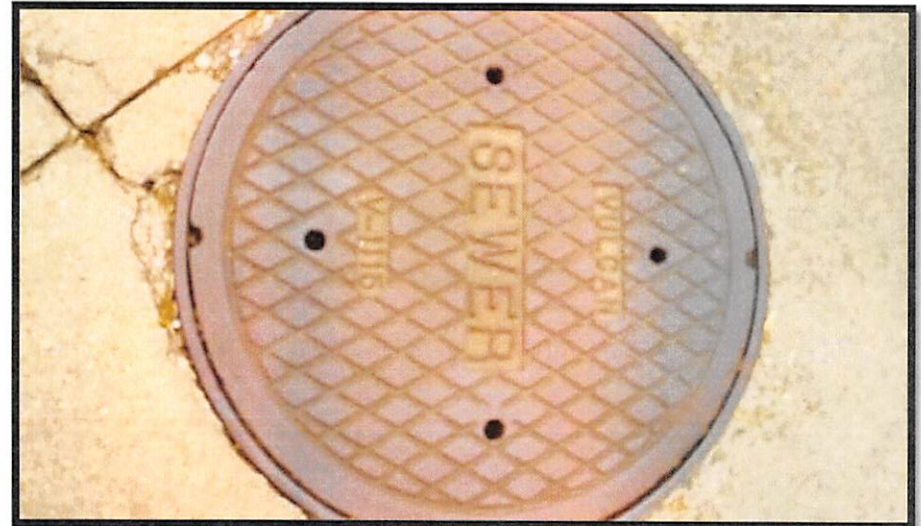
**APPENDIX F**

**SITE RECONNAISSANCE PHOTOGRAPHS**

# Site Reconnaissance Photographs



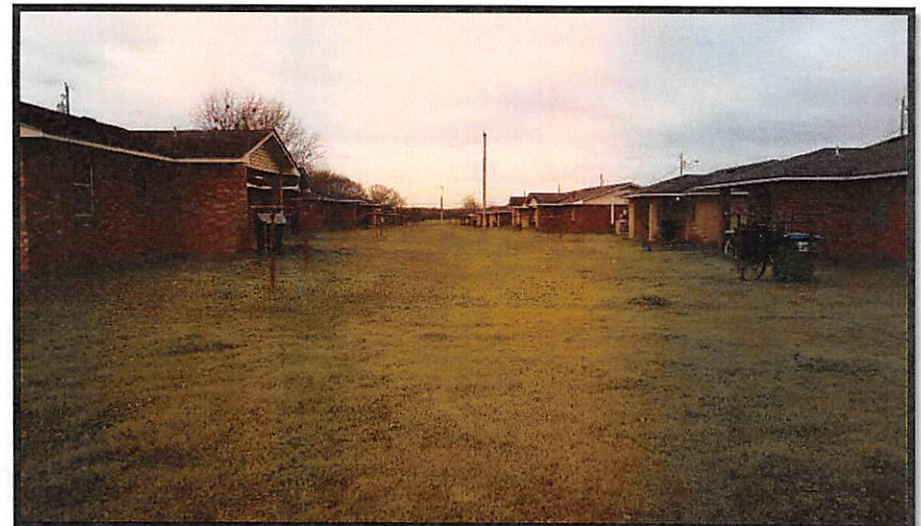
Entrance sign.



Sewer manhole cover near entrance.



1 of 9 pole-mounted transformers. Owned by Canton public utilities.



View facing west between the buildings in the middle section of the property.

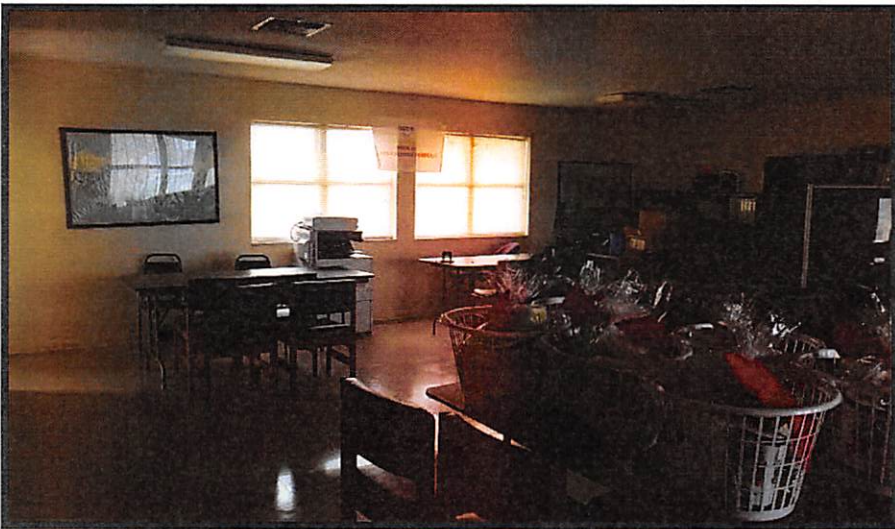
## Site Reconnaissance Photographs



Hydrant and water main access point on southwestern corner of central area.



View facing east down King Ranch Circle.



View of kitchen area in community building.



View facing north near entrance.



**APPENDIX G**

**HUD DOCUMENTATION**



U.S. Department of Housing and Urban  
Development  
451 Seventh Street, SW  
Washington, DC 20410  
[www.hud.gov](http://www.hud.gov)  
[espanol.hud.gov](http://espanol.hud.gov)

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

### **Project Information**

**Project Name:** Sam Estess Estates

**Responsible Entity:** Mississippi Region VI RAD

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

**State/Local Identifier:**

**Preparer:** MS Region VI RAD/Gill Group/Spectrum Env., Inc.

**Certifying Officer Name and Title:**

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

**Consultant (if applicable):** Gill Group, Inc./Spectrum Environmental, Inc.

**Direct Comments to:**

**Project Location:**

131 King Ranch Circle, Canton, Mississippi 39046

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

The Proposed project will consist of renovations to the existing apartment complex.

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

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

The site currently contains 40 single unit buildings.

**Funding Information**

Grant Number	HUD Program	Funding Amount

**Estimated Total HUD Funded Amount:**

**Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]:**

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

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

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24	Are formal compliance steps or	Compliance determinations

CFR §58.5 and §58.6	mitigation required?	No
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6</b>		
<b>Airport Hazards</b>	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	
24 CFR Part 51 Subpart D		
<b>Coastal Barrier Resources</b>	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	
Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]		
<b>Flood Insurance</b>	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	
Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]		
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 &amp; 58.5</b>		
<b>Clean Air</b>	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	
Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93		
<b>Coastal Zone Management</b>	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	
Coastal Zone Management Act, sections 307(c) & (d)		
<b>Contamination and Toxic Substances</b>	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	
24 CFR Part 50.3(i) & 58.5(i)(2)		
<b>Endangered Species</b>	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	
Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402		
<b>Explosive and Flammable Hazards</b>	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	
24 CFR Part 51 Subpart C		

<b>Farmlands Protection</b> Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
<b>Floodplain Management</b> Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
<b>Historic Preservation</b> National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
<b>Noise Abatement and Control</b> Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
<b>Sole Source Aquifers</b> Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
<b>Wetlands Protection</b> Executive Order 11990, particularly sections 2 and 5	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
<b>Wild and Scenic Rivers</b> Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
<b>ENVIRONMENTAL JUSTICE</b>		
<b>Environmental Justice</b> Executive Order 12898	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

**Environmental Assessment Factors** [24 CFR 58.40; Ref. 40 CFR 1508.8 & 1508.27] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and

supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. **All conditions, attenuation or mitigation measures have been clearly identified.**

**Impact Codes:** Use an impact code from the following list 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
<b>LAND DEVELOPMENT</b>		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	The site contains preexisting structures that will be renovated. There will be no clearing or new construction associated with this project, therefore impacts to any potential threatened and/or endangered species would be unlikely.
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	The site contains preexisting structures that will be renovated. There will be no clearing or new construction associated with this project, therefore impacts to any potential threatened and/or endangered species would be unlikely. <span style="float: right;">+</span>
Hazards and Nuisances including Site Safety and Noise	2	The site contains preexisting structures that will be renovated. There will be no clearing or new construction associated with this project, therefore impacts to any potential threatened and/or endangered species would be unlikely.
Energy Consumption	2	No impacts are anticipated.

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>SOCIOECONOMIC</b>		
Employment and Income Patterns	2	No impacts are anticipated.
Demographic Character Changes, Displacement	2	No impacts are anticipated.

Environmental Assessment Factor	Impact Code	Impact Evaluation
---------------------------------	-------------	-------------------

<b>COMMUNITY FACILITIES AND SERVICES</b>		
Educational and Cultural Facilities	2	No impacts are anticipated.
Commercial Facilities	2	No impacts are anticipated.
Health Care and Social Services	2	No impacts are anticipated.
Solid Waste Disposal / Recycling	2	No impacts are anticipated.
Waste Water / Sanitary Sewers	2	No impacts are anticipated.
Water Supply	2	No impacts are anticipated.
Public Safety - Police, Fire and Emergency Medical	2	No impacts are anticipated.
Parks, Open Space and Recreation	2	No impacts are anticipated.
Transportation and Accessibility	2	No impacts are anticipated.

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>NATURAL FEATURES</b>		
Unique Natural Features, Water Resources	2	There will be no clearing or new construction associated with this project, therefore, no impacts are anticipated.
Vegetation, Wildlife	2	There will be no clearing or new construction associated with this project, therefore, no impacts are anticipated.
Other Factors	2	There will be no clearing or new construction associated with this project, therefore, no impacts are anticipated.

**Additional Studies Performed:**

**Field Inspection** (Date and completed by): Field inspection completed by Thornton Turner on 14 February 2019.

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

Environmental Data Resources (EDR), Maintenance Staff, Property Owner and Local Fire Department.

**List of Permits Obtained:**

N/A

**Public Outreach [24 CFR 50.23 & 58.43]:**

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

N/A

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

N/A

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

N/A

**Summary of Findings and Conclusions:**

It is our opinion that there will be no environmental impacts from the proposed project.

**Mitigation Measures and Conditions [40 CFR 1505.2(c)]**

Summarize below 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.





## Airport Hazards (CEST and EA)

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
<b>References</b>		
<a href="https://www.hudexchange.info/environmental-review/airport-hazards">https://www.hudexchange.info/environmental-review/airport-hazards</a>		

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

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

Yes → *Continue to Question 2.*

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

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

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

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

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

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

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

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

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

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

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

**Explain approval process:**

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

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

**Worksheet Summary**

**Compliance Determination**

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

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

There are no airport hazards identified in connection to the property. See Appendix A.

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

Yes

No

## Air Quality (CEST and EA)

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
<b>Reference</b>		
<a href="https://www.hudexchange.info/environmental-review/air-quality">https://www.hudexchange.info/environmental-review/air-quality</a>		

### Scope of Work

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

Yes

→ Continue to Question 2.

No

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

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

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

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

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

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

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

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

Describe the findings:

→ Continue to Question 3.

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

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

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

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

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

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

### **Worksheet Summary**

#### **Compliance Determination**

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

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

The project will not consist of new construction and will not exceed *de minimis* or threshold emissions levels or screening levels of criteria pollutants.

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

Yes

No

## Coastal Barrier Resources (CEST and EA)

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)	
<b>References</b>		
<a href="https://www.hudexchange.info/environmental-review/coastal-barrier-resources">https://www.hudexchange.info/environmental-review/coastal-barrier-resources</a>		

Projects located in the following states must complete this form.

Alabama	Georgia	Massachusetts	New Jersey	Puerto Rico	Virgin Islands
Connecticut	Louisiana	Michigan	New York	Rhode Island	Virginia
Delaware	Maine	Minnesota	North Carolina	South Carolina	Wisconsin
Florida	Maryland	Mississippi	Ohio	Texas	

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

- No → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing that the site is not within a CBRS Unit.*
- Yes → *Continue to Question 2.*

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

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

- After consultation with the FWS the project was given approval to continue  
 → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map and documentation of a FWS approval.*
- Project was not given approval  
Project cannot proceed at this location.



### **Worksheet Summary**

#### **Compliance Determination**

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

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

The property is not located in a coastal barrier zone.

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

Yes

No

## Coastal Zone Management Act (CEST and EA)

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
References		
<a href="https://www.onecpd.info/environmental-review/coastal-zone-management">https://www.onecpd.info/environmental-review/coastal-zone-management</a>		

Projects located in the following states must complete this form.

Alabama	Florida	Louisiana	Mississippi	Ohio	Texas
Alaska	Georgia	Maine	New Hampshire	Oregon	Virgin Islands
American Samona	Guam	Maryland	New Jersey	Pennsylvania	Virginia
California	Hawaii	Massachusetts	New York	Puerto Rico	Washington
Connecticut	Illinois	Michigan	North Carolina	Rhode Island	Wisconsin
Delaware	Indiana	Minnesota	Northern Mariana Islands	South Carolina	

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

Yes → Continue to Question 2.

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

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

Yes → Continue to Question 3.

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

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

Yes, with mitigation. → Continue to Question 4.

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

No, project must be canceled.

Project cannot proceed at this location.

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

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

### **Worksheet Summary**

#### **Compliance Determination**

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

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

The property was not identified in a coastal zone.

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

Yes

No

Endangered Species Act (CEST and EA)

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

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

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

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

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

Explain your determination:

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

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

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

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

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

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

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

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

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

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

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

→ *Continue to Question 4, Informal Consultation.*

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

→ *Continue to Question 5, Formal Consultation.*

**4. Informal Consultation is required**

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

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

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

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

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

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

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

**5. Formal consultation is required**

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

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

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

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

Mitigation as follows will be implemented:

No mitigation is necessary.

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

**Worksheet Summary**

**Compliance Determination**

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

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

Due to the nature of the project, there will be no impact on threatened and/or endangered species on or around the target property.

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

- Yes  
 No

## Environmental Justice (CEST and EA)

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	
References		
<a href="https://www.hudexchange.info/environmental-review/environmental-justice">https://www.hudexchange.info/environmental-review/environmental-justice</a>		

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

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

Yes → Continue to Question 2.

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

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

Yes

Explain:

→ Continue to Question 3. Provide any supporting documentation.

No

Explain:

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



**Worksheet Summary**

**Compliance Determination**

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

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

There will not be any adverse environmental impacts associated with this project.

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

Yes

No

## Explosive and Flammable Hazards (CEST and EA)

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
<b>Reference</b>		
<a href="https://www.hudexchange.info/environmental-review/explosive-and-flammable-facilities">https://www.hudexchange.info/environmental-review/explosive-and-flammable-facilities</a>		

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

No

→ Continue to Question 2.

Yes

Explain:

→ Continue to Question 5.

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

No

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

Yes

→ Continue to Question 3.

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

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

No

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

Yes

→ Continue to Question 4.

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

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

Yes

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

No

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

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

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

Yes

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

No

→ Provide map(s) showing the location of the project site relative to residences and any other facility or area where people congregate or are present and your separation distance calculations.  
Continue to Question 6.

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

Note that only licensed professional engineers should design and implement blast barriers. If a barrier will be used or the project will be modified to compensate for an

unacceptable separation distance, provide approval from a licensed professional engineer.

**Worksheet Summary**

**Compliance Determination**

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

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

The databases searched as part of this report do not indicate any ASTs within a 1 mile radius of the target property.

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

Yes

No

## Farmlands Protection (CEST and EA)

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>
Reference		
<a href="https://www.hudexchange.info/environmental-review/farmlands-protection">https://www.hudexchange.info/environmental-review/farmlands-protection</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 → Continue to Question 2.

No

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

The project consists of renovations to pre-existing structures. No land will be converted as part of this project.

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

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

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

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

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

Yes → Continue to Question 3.

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

- Complete form **AD-1006**, "Farmland Conversion Impact Rating" [http://www.nrcs.usda.gov/Internet/FSE\\_DOCUMENTS/stelprdb1045394.pdf](http://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb1045394.pdf) and contact the state soil scientist before sending it to the local NRCS District Conservationist.

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

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

**Document your conclusion:**

- Project will proceed with mitigation.

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

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

- Project will proceed without mitigation.

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

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

**Worksheet Summary**

**Compliance Determination**

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

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

No "important farmland," including prime farmland, unique farmland, or farmland of statewide or local importance regulated under the Farmland Protection Policy Act, occur on the project site.

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

Yes

No

## Flood Insurance (CEST and EA)

General requirements	Legislation	Regulation
Certain types of federal financial assistance may not be used in floodplains unless the community participates in National Flood Insurance Program and flood insurance is both obtained and maintained.	Flood Disaster Protection Act of 1973 as amended (42 USC 4001-4128)	24 CFR 50.4(b)(1) and 24 CFR 58.6(a) and (b); 24 CFR 55.1(b).
<b>Reference</b>		
<a href="https://www.hudexchange.info/environmental-review/flood-insurance">https://www.hudexchange.info/environmental-review/flood-insurance</a>		

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

No. This project does not require flood insurance or is accepted from flood insurance. → *Continue to the Worksheet Summary.*

Yes → *Continue to Question 2.*

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

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

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

No → *Continue to the Worksheet Summary.*

Yes → *Continue to Question 3.*

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

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

For loans, loan insurance or loan guarantees, flood insurance coverage must be continued for the term of the loan. For grants and other non-loan forms of financial assistance, flood insurance coverage must be continued for the life of the building irrespective of the transfer of ownership. The amount of coverage must equal the total project cost or the maximum coverage limit of the National Flood Insurance Program, whichever is less



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

→ *Continue to the Worksheet Summary.*

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

→ *Continue to the Worksheet Summary.*

- No. The community is not participating, or its participation has been suspended. Federal assistance may not be used at this location. Cancel the project at this location.

### **Worksheet Summary**

#### **Compliance Determination**

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

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

The target property is not located within a FEMA designated flood hazard area as noted by FEMA Flood Insurance Rate Map number 28089C0410F.

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

Yes

No

## Floodplain Management (CEST and EA)

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
<b>Reference</b>		
<a href="https://www.hudexchange.info/environmental-review/floodplain-management">https://www.hudexchange.info/environmental-review/floodplain-management</a>		

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

Yes

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

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

No → Continue to Question 2.

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

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

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

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

Yes

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

Floodway → Continue to Question 3, Floodways

- Coastal High Hazard Area (V Zone) → *Continue to Question 4, Coastal High Hazard Areas*
- 500-year floodplain (B Zone or shaded X Zone) → *Continue to Question 5, 500-year Floodplains*
- 100-year floodplain (A Zone) → *The 8-Step Process is required. Continue to Question 6, 8-Step Process*

### 3. **Floodways**

**Is this a functionally dependent use?**

- Yes

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

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

- No

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

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

**Is this a critical action?**

- Yes

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

- No

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

- Yes, there is new construction.

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

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

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

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

**5. 500-year Floodplain**

**Is this a critical action?**

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

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

**6. 8-Step Process.**

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

8-Step Process applies.

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

→ *Continue to Question 7, Mitigation*

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

Provide documentation of 5-Step Process.

Select the applicable citation:

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

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

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

55.2(b)(10), and the footprint of the structure and paved areas is not significantly increased.

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

→ Continue to Question 7, Mitigation

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

Select the applicable citation:

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

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

**7. Mitigation**

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

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

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

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

**Worksheet Summary**

**Compliance Determination**

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

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates

- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

The target property is not located within a FEMA designated flood hazard area as noted by FEMA Flood Insurance Rate Map number 28089C0410F.

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

Yes

No

## Historic Preservation (CEST and EA)

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)	<a href="#">36 CFR 800 "Protection of Historic Properties"</a>
<b>References</b>		
<a href="https://www.hudexchange.info/environmental-review/historic-preservation">https://www.hudexchange.info/environmental-review/historic-preservation</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.)

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

→ Continue to the Worksheet Summary.

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

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

→ Continue to the Worksheet Summary.

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



**The Section 106 Process**

After determining the need to do a Section 106 review, initiate consultation with regulatory and other interested parties, identify and evaluate historic properties, assess effects of the project on properties listed on or eligible for the National Register of Historic Places, and resolve any adverse effects through project design modifications or mitigation.

Note that consultation continues through all phases of the review.

Step 1: Initiate consultation

Step 2: Identify and evaluate historic properties

Step 3: Assess effects of the project on historic properties

Step 4: Resolve any adverse effects

**Step 1 - Initiate Consultation**

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

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

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

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

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

- Other Consulting Parties

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

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

The Mississippi Department of Archives and History (MDAH) was contacted in order to obtain a section 106 clearance letter. MDAH provided a letter dated October 9, 2018 that they have no objection with the proposed project.

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

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

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

No historic properties were located on or adjacent to the target property. A map depicting the target property that was obtained from the National Register of Historic Places is provided as Appendix A of the Phase I ESA.

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

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

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

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

--

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

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

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

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

Additional notes:

A survey of surrounding building was conducted as part of the process to obtain a section 106 clearance letter. MDAH provided a letter dated October 9, 2018 that they have no objection with the proposed project.

- No → *Continue to Step 3.*

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

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

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

- No Historic Properties Affected

**Document reason for finding:**

- No historic properties present. → *Provide concurrence(s) or objection(s) and continue to the Worksheet Summary.*

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

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

No Adverse Effect

**Document reason for finding:**

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

Yes

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

- Avoidance
- Modification of project
- Other

**Describe conditions here:**

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

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

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

Adverse Effect

**Document reason for finding:**

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

Criteria of Adverse Effect: [36 CFR 800.5](#)]

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

→ *Continue to Step 4.*

#### Step 4 - Resolve Adverse Effects

Work with consulting parties to try to avoid, minimize or mitigate adverse effects. Refer to HUD guidance and [36 CFR 800.6 and 800.7](#).

**Were the Adverse Effects resolved?**

Yes

**Describe the resolution of Adverse Effects, including consultation efforts and participation by the Advisory Council on Historic Preservation:**

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

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

No

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

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

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

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

**Worksheet Summary**

**Compliance Determination**

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

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

The Mississippi Department of Archives and History (MDAH) was contacted in order to obtain a section 106 clearance letter. MDAH provided a letter dated October 9, 2018 that they have no objection with the proposed project.

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

Yes

No

## Noise (EA Level Reviews)

General requirements	Legislation	Regulation
HUD's noise regulations protect residential properties from excessive noise exposure. HUD encourages mitigation as appropriate.	Noise Control Act of 1972  General Services Administration Federal Management Circular 75-2: "Compatible Land Uses at Federal Airfields"	Title 24 CFR 51 Subpart B
References		
<a href="https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control">https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control</a>		

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

- New construction for residential use

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

→ *Continue to Question 2.*

- Rehabilitation of an existing residential property

NOTE: For major or substantial rehabilitation in Normally Unacceptable zones, HUD encourages mitigation to reduce levels to acceptable compliance standards. For major rehabilitation in Unacceptable zones, HUD strongly encourages mitigation to reduce levels to acceptable compliance standards. See 24 CFR 51 Subpart B for further details.

→ *Continue to Question 2.*

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

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

- None of the above

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



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

**Indicate the findings of the Preliminary Screening below:**

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

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing the location of the project relative to any noise generators.*

Noise generators were found within the threshold distances.

→ *Continue to Question 3.*

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

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

**Indicate noise level here:**

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

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

**Indicate noise level here:**

If project is rehabilitation:

→ *Continue to Question 4. Provide noise analysis, including noise level and data used to complete the analysis.*

If project is new construction:

**Is the project in a largely undeveloped area<sup>1</sup>?**

No

→ *Continue to Question 4. Provide noise analysis, including noise level and data used to complete the analysis, and any other relevant information.*

---

<sup>1</sup> A largely undeveloped area means the area within 2 miles of the project site is less than 50 percent developed with urban uses and does not have water and sewer capacity to serve the project.

Yes

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

Unacceptable: (Above 75 decibels)

Indicate noise level here:

If project is rehabilitation:

HUD strongly encourages conversion of noise-exposed sites to land uses compatible with high noise levels. Consider converting this property to a non-residential use compatible with high noise levels.

→ Continue to Question 4. Provide noise analysis, including noise level and data used to complete the analysis, and any other relevant information.

If project is new construction:

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

Convert to an EIS

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

Continue to Question 4.

Provide waiver

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

Continue to Question 4.

- 4. HUD strongly encourages mitigation be used to eliminate adverse noise impacts. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation. This information will be automatically included in the Mitigation summary for the environmental review.**

Mitigation as follows will be implemented:

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

No mitigation is necessary.

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

→ Continue to the Worksheet Summary.

**Worksheet Summary**

**Compliance Determination**

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

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

The target property is not located within 1,000 feet of a road source, 3,000 feet of a railroad source, 5 miles of a public civil airport source, or 15 miles of a military airport. Based on these factors, further assessment for noise was not required.

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

Yes

No

MISSISSIPPI DEPARTMENT *of* ARCHIVES AND HISTORY



HISTORIC PRESERVATION DIVISION  
P. O. BOX 571  
Jackson, MS 39205-0571  
Phone 601-576-6940 Fax 601-576-6955  
Website: mdah.ms.gov

October 9, 2018

Ms. Jamie Cox  
Spectrum Environmental  
85 Spectrum Cove  
Alabaster, Alabama 35007

RE: Proposed renovation of forty buildings located at 101 King Ranch Circle, Canton, S13,  
T9N, R2E, (HUD) MDAH Project Log #10-045-18, Madison County

Dear Ms. Cox:

We have reviewed your request for a cultural resources assessment, received on October 8, 2018, for the above referenced project in accordance with our responsibilities under Section 106 of the National Historic Preservation Act and 36 CFR Part 800. After reviewing the information provided, it is our determination that the properties referenced above are not eligible for listing in the National Register of Historic Places nor are they located in a National Register district. Therefore, we have no objection with the proposed undertaking.

Should there be additional work in connection with the project, or any changes in the scope of work, please let us know in order that we may provide you with appropriate comments in compliance with the above referenced regulations. If we can be of further assistance, please do not hesitate to contact us at (601) 576-6940.

Sincerely,

A handwritten signature in black ink, appearing to read "Hayley E. Smith", written in a cursive style.

Hayley E. Smith  
Review and Compliance Assistant

FOR: Katie Blount  
State Historic Preservation Officer

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

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

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

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

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

Continue to Question 2.

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

- No

**Explain:**

The Phase I ESA did not identify the presences of petroleum products or hazardous materials.

<sup>1</sup> HUD regulations at 24 CFR § 58.5(i)(2)(ii) require that the environmental review for multifamily housing with five or more dwelling units or non-residential property include the evaluation of previous uses of the site or other evidence of contamination on or near the site. For acquisition and new construction of multifamily and nonresidential properties HUD strongly advises the review include an ASTM Phase I Environmental Site Assessment (ESA) to meet real estate transaction standards of due diligence and to help ensure compliance with HUD's toxic policy at 24 CFR §58.5(i) and 24 CFR §50.3(i). Also note that some HUD programs require an ASTM Phase I ESA.

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

Yes.

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

### 3. Mitigation

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

#### Can adverse environmental impacts be mitigated?

Adverse environmental impacts cannot feasibly be mitigated

→ Project cannot proceed at this location.

Yes, adverse environmental impacts can be eliminated through mitigation.

→ Provide all mitigation requirements<sup>2</sup> and documents. Continue to Question 4.

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

---

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

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

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

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

Complete removal

→ *Continue to the Worksheet Summary.*

Risk-based corrective action (RBCA)

→ *Continue to the Worksheet Summary.*

### **Worksheet Summary**

#### **Compliance Determination**

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

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

The Phase I ESA did not identify any petroleum products or hazardous materials on the target property.

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

Yes

No

## Sole Source Aquifers (CEST and EA)

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

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

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

Yes → *Continue to Question 2.*

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

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

No → *Continue to Question 3.*

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

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

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

No → *Continue to Question 5.*

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

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

---

<sup>1</sup> A sole source aquifer is defined as an aquifer that supplies at least 50 percent of the drinking water consumed in the area overlying the aquifer. This includes streamflow source areas, which are upstream areas of losing streams that flow into the recharge area.



No → Continue to Question 5.

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

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

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

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

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

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

**Worksheet Summary**

**Compliance Determination**

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

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

See appendix A of the Phase I ESA

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

Yes

No

## Wetlands (CEST and EA)

General requirements	Legislation	Regulation
Executive Order 11990 discourages that 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.
<b>References</b>		
<a href="https://www.hudexchange.info/environmental-review/wetlands-protection">https://www.hudexchange.info/environmental-review/wetlands-protection</a>		

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

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

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

Yes → *Continue to Question 2.*

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

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

No, a wetland will not be impacted in terms of E.O. 11990's definition of new construction.  
→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map or any other relevant documentation to explain your determination.*

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

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

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

Continue to Question 3.

- 3. 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.**

No new Construction will be involved.

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

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

**Worksheet Summary**

**Compliance Determination**

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

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

No wetlands were identified on the target property.

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

Yes

No

## Wild and Scenic Rivers (CEST and EA)

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
References		
<a href="https://www.hudexchange.info/environmental-review/wild-and-scenic-rivers">https://www.hudexchange.info/environmental-review/wild-and-scenic-rivers</a>		

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

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

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

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

No

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

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

→ Continue to Question 2.

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

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

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

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

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

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

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

→ *Continue to Question 3.*

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

The property does not lie near any rivers as defined by the National Wild and Scenic Rivers act.

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

## **Worksheet Summary**

### **Compliance Determination**

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

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

The property does not lie near any rivers as defined by the National Wild and Scenic Rivers act.

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

Yes

No



**APPENDIX H**  
**IPAC REPORT**



## United States Department of the Interior



FISH AND WILDLIFE SERVICE  
Mississippi Ecological Services Field Office  
6578 Dogwood View Parkway, Suite A  
Jackson, MS 39213-7856  
Phone: (601) 965-4900 Fax: (601) 965-4340  
<http://www.fws.gov/mississippiES/endsp.html>

In Reply Refer To:  
Consultation Code: 04EM1000-2019-SLI-0377  
Event Code: 04EM1000-2019-E-00923  
Project Name: 2735-147-01 Canton

February 28, 2019

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

### To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF>

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 *et seq.*), and projects affecting these species may require development of an eagle conservation plan ([http://www.fws.gov/windenergy/eagle\\_guidance.html](http://www.fws.gov/windenergy/eagle_guidance.html)). Additionally, wind energy projects should follow the wind energy guidelines (<http://www.fws.gov/windenergy/>) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm>; <http://www.towerkill.com>; and <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List
- USFWS National Wildlife Refuges and Fish Hatcheries

## Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

**Mississippi Ecological Services Field Office**  
6578 Dogwood View Parkway, Suite A  
Jackson, MS 39213-7856  
(601) 965-4900

## Project Summary

Consultation Code: 04EM1000-2019-SLI-0377

Event Code: 04EM1000-2019-E-00923

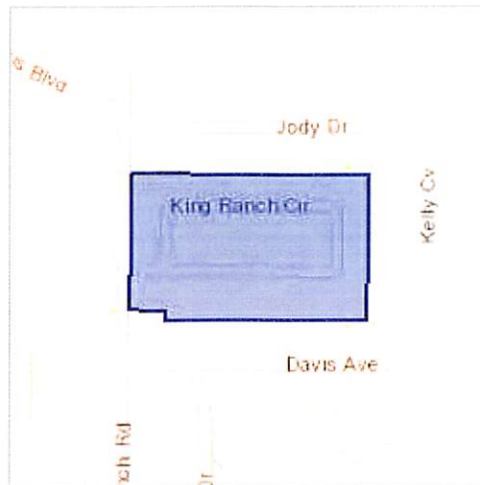
Project Name: 2735-147-01 Canton

Project Type: \*\* OTHER \*\*

Project Description: Gill housing

Project Location:

Approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/place/32.62641385666115N90.05328500597147W>



Counties: Madison, MS

---

## Endangered Species Act Species

There is a total of 2 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries<sup>1</sup>, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

- 
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

### Mammals

NAME	STATUS
Northern Long-eared Bat <i>Myotis septentrionalis</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/9045">https://ecos.fws.gov/ecp/species/9045</a>	Threatened

### Birds

NAME	STATUS
Wood Stork <i>Mycteria americana</i> Population: AL, FL, GA, MS, NC, SC No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/8477">https://ecos.fws.gov/ecp/species/8477</a>	Threatened

### Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

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## USFWS National Wildlife Refuge Lands And Fish Hatcheries

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

---

APPENDIX I  
ASBESTOS CONTAINING MATERIALS DOCUMENTATION





**Asbestos Chain of Custody**  
**EMSL Order Number (Lab Use Only):**

071704194

2205 CORP. PLAZA PKWY. SE,  
 STE 200  
 SMYRNA, GA 30080  
 PHONE: 770-956-9150  
 FAX:

Company : Spectrum Environmental		EMSL-Bill to: <input checked="" type="checkbox"/> Same <input type="checkbox"/> Different If Bill to is Different note instructions in Comments**	
Street: 85 Spectrum Cove		Third Party Billing requires written authorization from third party	
City: Alabaster	State/Province: AL	Zip/Postal Code: 35007	Country: USA
Report To (Name): Richard Johnson		Fax #:	
Telephone #: 205-664-2000		Email Address: tjohnson@specenviro.com	
Project Name/Number: <u>Sum. Estess Estates 2735-094</u>			
Please Provide Results: <input type="checkbox"/> Fax <input checked="" type="checkbox"/> Email Purchase Order: <u>11402</u> U.S. State Samples Taken: <u>MS</u>			
Turnaround Time (TAT) Options* - Please Check			
<input type="checkbox"/> 3 Hour <input type="checkbox"/> 6 Hour <input type="checkbox"/> 24 Hour <input type="checkbox"/> 48 Hour <input type="checkbox"/> 72 Hour <input type="checkbox"/> 96 Hour <input checked="" type="checkbox"/> 1 Week <input type="checkbox"/> 2 Week			
*For TEM Air 3 hr through 6 hr, please call ahead to schedule *There is a premium charge for 3 Hour TEM AHERA or EPA Level II TAT. You will be asked to sign an authorization form for this service. Analysis completed in accordance with EMSL's Terms and Conditions located in the Analytical Price Guide.			
<b>PCM - Air</b> <input type="checkbox"/> NIOSH 7400 <input type="checkbox"/> w/ OSHA 8hr. TWA <b>PLM - Bulk (reporting limit)</b> <input checked="" type="checkbox"/> PLM EPA 600/R-93/116 (<1%) <input type="checkbox"/> PLM EPA NOB (<1%) Point Count <input type="checkbox"/> 400 (<0.25%) <input type="checkbox"/> 1000 (<0.1%) Point Count w/Gravimetric <input type="checkbox"/> 400 (<0.25%) <input type="checkbox"/> 1000 (<0.1%) <input type="checkbox"/> NYS 198.1 (friable in NY) <input type="checkbox"/> NYS 198.6 NOB (non-friable-NY) <input type="checkbox"/> NIOSH 9002 (<1%)	<b>TEM - Air</b> <input type="checkbox"/> 4-4.5hr TAT (AHERA only) <input type="checkbox"/> AHERA 40 CFR, Part 763 <input type="checkbox"/> NIOSH 7402 <input type="checkbox"/> EPA Level II <input type="checkbox"/> ISO 10312 <b>TEM - Bulk</b> <input type="checkbox"/> TEM EPA NOB <input type="checkbox"/> NYS NOB 198.4 (non-friable-NY) <input type="checkbox"/> Chatfield SOP <input type="checkbox"/> TEM Mass Analysis-EPA 600 sec. 2.5 <b>TEM - Water:</b> EPA 100.2 Fibers >10µm <input type="checkbox"/> Waste <input type="checkbox"/> Drinking All Fiber Sizes <input type="checkbox"/> Waste <input type="checkbox"/> Drinking	<b>TEM- Dust</b> <input type="checkbox"/> Microvac - ASTM D 5755 <input type="checkbox"/> Wipe - ASTM D6480 <input type="checkbox"/> Carpet Sonication (EPA 600/J-93/167) <b>Soil/Rock/Vermiculite</b> <input type="checkbox"/> PLM CARB 435 - A (0.25% sensitivity) <input type="checkbox"/> PLM CARB 435 - B (0.1% sensitivity) <input type="checkbox"/> TEM CARB 435 - B (0.1% sensitivity) <input type="checkbox"/> TEM CARB 435 - C (0.01% sensitivity) <input type="checkbox"/> EPA Protocol (Semi-Quantitative) <input type="checkbox"/> EPA Protocol (Quantitative) <b>Other:</b> <input type="checkbox"/>	
<input checked="" type="checkbox"/> Check For Positive Stop - Clearly Identify Homogenous Group			
Samplers Name: Richard Johnson		Samplers Signature:	
Sample #	Sample Description	Volume/Area (Air) HA # (Bulk)	Date/Time Sampled
H	White / Gray 12x12 VGT	HA 1	7-11-17
1-2	┆	┆	
2-1	Drywall	HA 2	
2-2	┆	┆	
3-1	Bath Caulk	HA 3	
3-2	┆	┆	
4-1	Popcorn Ceiling	HA 4	
4-2	┆	┆	
Client Sample # (s): <u>11</u> - <u>5-1</u>		Total # of Samples: <u>12</u>	
Relinquished (Client):		Date: <u>7-11-17</u>	Time: <u>4:00 PM</u>
Received (Lab): <u>Chlorissaok (HS)</u>		Date: <u>7/17/17</u>	Time: <u>9:53</u>
Comments/Special Instructions:			



### Asbestos Chain of Custody

EMSL Order Number (Lab Use Only):  
[ ]

EMSL ANALYTICAL, INC.  
2205 CORP. PLAZA PKWY.  
SE, STE 200  
SMYRNA, GA 30080  
PHONE: 707-956-9150  
FAX:

Additional Pages of the Chain of Custody are only necessary if needed for additional sample information

Sample #	Sample Description	Volume/Area (Air) HA # (Bulk)	Date/Time Sampled
4-3	Popcorn Ceiling	HA 4	7-11-17
4-4	I	I	I
4-5	I	I	I
5-1	Interior Window Caulk	HA 5	I

\*Comments/Special Instructions:



# EMSL Analytical, Inc.

2205 Corporate Plaza Parkway SE, Suite 200 Smyrna, GA 30080  
Tel/Fax: (770) 956-9150 / (770) 956-9181  
<http://www.EMSL.com> / [atlantalab@emsl.com](mailto:atlantalab@emsl.com)

EMSL Order: 071704194  
Customer ID: SPEN63  
Customer PO: 11402  
Project ID:

Attention: Richard Johnson  
Spectrum Environmental, Inc.  
85 Spectrum Cove  
Alabaster, AL 35007  
Phone: (205) 664-2000  
Fax: (205) 664-2142  
Received Date: 07/17/2017 9:53 AM  
Analysis Date: 07/21/2017  
Collected Date: 07/11/2017  
Project: Sam Estess Estates/ 2735-094

## Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
1-1-Floor Tile 071704194-0001	White/ Gray 12x12 VCT	Beige Non-Fibrous Homogeneous	HA: 1	100% Non-fibrous (Other)	None Detected
1-1-Mastic 071704194-0001A	White/ Gray 12x12 VCT	Yellow Non-Fibrous Homogeneous	HA: 1	100% Non-fibrous (Other)	None Detected
1-2-Floor Tile 071704194-0002	White/ Gray 12x12 VCT	Gray Non-Fibrous Homogeneous	HA: 1	100% Non-fibrous (Other)	None Detected
1-2-Mastic 071704194-0002A	White/ Gray 12x12 VCT	Yellow Non-Fibrous Homogeneous	HA: 1	100% Non-fibrous (Other)	None Detected
2-1-Joint Compound 071704194-0003	Drywall	White Non-Fibrous Homogeneous	HA: 2	100% Non-fibrous (Other)	None Detected
2-1-Drywall 071704194-0003A	Drywall	Gray Non-Fibrous Homogeneous	HA: 2	100% Non-fibrous (Other)	None Detected
2-2-Joint Compound 071704194-0004	Drywall	White Non-Fibrous Homogeneous	HA: 2	100% Non-fibrous (Other)	None Detected
2-2-Drywall 071704194-0004A	Drywall	Various Non-Fibrous Homogeneous	HA: 2	100% Non-fibrous (Other)	None Detected
3-1 071704194-0005	Bath Caulk	White Non-Fibrous Homogeneous	HA: 3	100% Non-fibrous (Other)	None Detected
3-2 071704194-0006	Bath Caulk	White Non-Fibrous Homogeneous	HA: 3	100% Non-fibrous (Other)	None Detected
4-1 071704194-0007	Popcorn Ceiling	Beige Non-Fibrous Homogeneous	HA: 4	100% Non-fibrous (Other)	None Detected
4-2 071704194-0008	Popcorn Ceiling	Beige Non-Fibrous Homogeneous	HA: 4	100% Non-fibrous (Other)	None Detected

Initial report from: 07/21/2017 12:34:31



# EMSL Analytical, Inc.

2205 Corporate Plaza Parkway SE, Suite 200 Smyrna, GA 30080  
Tel/Fax: (770) 956-9150 / (770) 956-9181  
<http://www.EMSL.com> / [atlantalab@emsl.com](mailto:atlantalab@emsl.com)

EMSL Order: 071704194  
Customer ID: SPEN63  
Customer PO: 11402  
Project ID:

## Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
4-3 071704194-0009	Popcorn Ceiling	Beige Non-Fibrous Homogeneous	HA: 4	100% Non-fibrous (Other)	None Detected
4-4 071704194-0010	Popcorn Ceiling	Beige Non-Fibrous Homogeneous	HA: 4	100% Non-fibrous (Other)	None Detected
4-5 071704194-0011	Popcorn Ceiling	Beige Non-Fibrous Homogeneous	HA: 4	100% Non-fibrous (Other)	None Detected
5-1 071704194-0012	Interior Window Caulk	Brown Non-Fibrous Homogeneous	HA: 5	100% Non-fibrous (Other)	None Detected

Analyst(s)

Amber Baynes (9)  
Anthony Sanaie (7)

Amber Baynes, Asbestos Lab Supervisor  
or Other Approved Signatory

EMSL maintains liability limited to cost of analysis. This report relates only to the samples reported and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. Interpretation and use of test results are the responsibility of the client. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST or any agency of the federal government. Non-friable organically bound materials present a problem matrix and therefore EMSL recommends gravimetric reduction prior to analysis. Samples received in good condition unless otherwise noted. Estimated accuracy, precision and uncertainty data available upon request. Unless requested by the client, building materials manufactured with multiple layers (i.e. linoleum, wallboard, etc.) are reported as a single sample. Reporting limit is 1%

Samples analyzed by EMSL Analytical, Inc Smyrna, GA NVLAP Lab Code 101048-1

Initial report from: 07/21/2017 12:34:31



U.S. Department of Housing and Urban  
Development  
451 Seventh Street, SW  
Washington, DC 20410  
[www.hud.gov](http://www.hud.gov)  
[espanol.hud.gov](http://espanol.hud.gov)

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

### **Project Information**

**Project Name:** Sam Estess Estates

**Responsible Entity:** Madison County Board of Supervisors

**Grant Recipient** (if different than Responsible Entity): MS Regional Housing Authority VI

**State/Local Identifier:** Mississippi - MS058

**Preparer:** MS Region VI RAD/Gill Group/Spectrum Env., Inc.

**Certifying Officer Name and Title:** Trey Baxter, President

**Grant Recipient** (if different than Responsible Entity): MS Regional Housing Authority VI

**Consultant** (if applicable): Gill Group, Inc./Spectrum Environmental, Inc.

**Direct Comments to:** Jamie D. Cox, P.G. ([jcox@specenviro.com](mailto:jcox@specenviro.com))

**Project Location:**

131 King Ranch Circle, Canton, Mississippi 39046

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

The Proposed project will consist of renovations to the existing apartment complex, which includes 40 units.

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

The project is an affordable housing project that is being renovated.

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

The site has 40 single unit buildings units as well as a single-story office and maintenance shop. Surrounding properties are predominantly residential use.

**Funding Information**

Grant Number	HUD Program	Funding Amount
MS26P058501-16	2016 Capital Funds	\$195,264
MS26P058901-17	2017 Capital Funds	\$195,312
MS058-00000617D	2017 Operating Subsidy	\$441,764
	PHA Funds - Reserves	\$1,200,000
	Administrative Funds	\$4,800,000
	RAD/PBV	\$257,760

**Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]:**

\$344,640

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

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

<b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24	Are formal compliance steps or	Compliance determinations
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CFR §58.5 and §58.6	mitigation required?	No
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6</b>		
<b>Airport Hazards</b> 24 CFR Part 51 Subpart D	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	See section 6.5.1 of the Phase I ESA (page 18), Appendix A - Figure 4 and Partner Worksheet in Appendix G.
<b>Coastal Barrier Resources</b> Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	See section 6.5.2 of the Phase I ESA (page 18), Appendix A - Figure 9 and Partner Worksheet in Appendix G.
<b>Flood Insurance</b> Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	See section 6.5.3 of the Phase I ESA (page 18), Appendix A - Figure 5 and Partner Worksheet in Appendix G.
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 &amp; 58.5</b>		
<b>Clean Air</b> Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	See section 6.5.4 of the Phase I ESA (page 18) and Partner Worksheet in Appendix G.
<b>Coastal Zone Management</b> Coastal Zone Management Act, sections 307(c) & (d)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	See section 6.5.5 of the Phase I ESA (page 19), Appendix A - Figure 9 and Partner Worksheet in Appendix G.
<b>Contamination and Toxic Substances</b> 24 CFR Part 50.3(i) & 58.5(i)(2)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	See section 6.5.6 of the Phase I ESA (page 19) and Partner Worksheet in Appendix G.
<b>Endangered Species</b> Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	See section 6.5.7 of the Phase I ESA (page 19) and Partner Worksheet in Appendix G.
<b>Explosive and Flammable Hazards</b> 24 CFR Part 51 Subpart C	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	See section 6.5.8 of the Phase I ESA (page 19) and Partner Worksheet in Appendix G.

<p><b>Farmlands Protection</b></p> <p>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p>Yes    No</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>See section 6.5.9 of the Phase I ESA (page 19) and Partner Worksheet in Appendix G.</p>
<p><b>Floodplain Management</b></p> <p>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p>Yes    No</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>See section 6.5.10 of the Phase I ESA (page 20), Appendix A - Figure 5 and Partner Worksheet in Appendix G.</p>
<p><b>Historic Preservation</b></p> <p>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p>Yes    No</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>See section 6.5.11 of the Phase I ESA (page 20), Appendix A - Figure 6 and Partner Worksheet in Appendix G.</p>
<p><b>Noise Abatement and Control</b></p> <p>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p>Yes    No</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>See section 6.5.12 of the Phase I ESA (page 20) and Partner Worksheet in Appendix G.</p>
<p><b>Sole Source Aquifers</b></p> <p>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p>Yes    No</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>See section 6.5.13 of the Phase I ESA (page 20), Appendix A - Figure 7 and Partner Worksheet in Appendix G.</p>
<p><b>Wetlands Protection</b></p> <p>Executive Order 11990, particularly sections 2 and 5</p>	<p>Yes    No</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>See section 6.5.14 of the Phase I ESA (page 20), Appendix A - Figure 8 and Partner Worksheet in Appendix G.</p>
<p><b>Wild and Scenic Rivers</b></p> <p>Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p>	<p>Yes    No</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>See section 6.5.15 of the Phase I ESA (page 21), Appendix A - Figure 9 and Partner Worksheet in Appendix G.</p>
<p><b>ENVIRONMENTAL JUSTICE</b></p>		
<p><b>Environmental Justice</b></p> <p>Executive Order 12898</p>	<p>Yes    No</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>See section 6.5.16 of the Phase I ESA (page 20), Appendix A - Figure 5 and Partner Worksheet in Appendix G.</p>

**Environmental Assessment Factors** [24 CFR 58.40; Ref. 40 CFR 1508.8 & 1508.27] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and



supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. **All conditions, attenuation or mitigation measures have been clearly identified.**

**Impact Codes:** Use an impact code from the following list 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
<b>LAND DEVELOPMENT</b>		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	The site contains preexisting structures that will be renovated. There will be no clearing or new construction associated with this project, therefore there will be no impacts that will affect the conformance with plans, zoning, land use, scale/urban design.
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	The site contains preexisting structures that will be renovated. There will be no clearing or new construction associated with this project, therefore no impacts are expected in regards to the soil suitability, slopes, erosion/drainage or stormwater runoff. <span style="float: right;">24</span>
Hazards and Nuisances including Site Safety and Noise	2	The site contains preexisting structures that will be renovated. There will be no clearing or new construction associated with this project. There are no anticipated hazards or nuisances associated with this project.
Energy Consumption	2	No impacts are anticipated.

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>SOCIOECONOMIC</b>		
Employment and Income Patterns	2	No impacts are anticipated.
Demographic Character Changes, Displacement	2	No impacts are anticipated.

Environmental Assessment Factor	Impact Code	Impact Evaluation
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<b>COMMUNITY FACILITIES AND SERVICES</b>		
Educational and Cultural Facilities	2	No impacts are anticipated.
Commercial Facilities	2	No impacts are anticipated.
Health Care and Social Services	2	No impacts are anticipated.
Solid Waste Disposal / Recycling	2	No impacts are anticipated.
Waste Water / Sanitary Sewers	2	No impacts are anticipated.
Water Supply	2	No impacts are anticipated.
Public Safety - Police, Fire and Emergency Medical	2	No impacts are anticipated.
Parks, Open Space and Recreation	2	No impacts are anticipated.
Transportation and Accessibility	2	No impacts are anticipated.

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>NATURAL FEATURES</b>		
Unique Natural Features, Water Resources	2	There will be no clearing or new construction associated with this project, therefore, no impacts are anticipated.
Vegetation, Wildlife	2	There will be no clearing or new construction associated with this project, therefore, no impacts are anticipated.
Other Factors	2	There will be no clearing or new construction associated with this project, therefore, no impacts are anticipated.

**Additional Studies Performed:**

**Field Inspection (Date and completed by):** Field inspection completed by Thornton Turner on February 14, 2019.

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

Environmental Data Resources (EDR), Maintenance Staff, Property Owner and Local Fire Department.

**List of Permits Obtained:**

It is our opinion that there will be no impacts from the proposed project, as such no permits are required to be listed +

**Public Outreach [24 CFR 50.23 & 58.43]:**

Public notice has been provided to the community for this proposed project and requested funds.

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

No impacted anticipated

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

Alternative sites are not listed, since there are no anticipated impacts from this renovation project.

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

It is our opinion that there will be no impacts from the proposed project, as such no actions are recommended +

**Summary of Findings and Conclusions:**

It is our opinion that there will be no impacts from the proposed project.

**Mitigation Measures and Conditions [40 CFR 1505.2(c)]**

Summarize below 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

**Determination:**

**Finding of No Significant Impact** [24 CFR 58.40(g)(1); 40 CFR 1508.27]  
The project will not result in a significant impact on the quality of the human environment.

**Finding of Significant Impact** [24 CFR 58.40(g)(2); 40 CFR 1508.27]  
The project may significantly affect the quality of the human environment.

Preparer Signature:       *Jamie D. Cox*       Date:       6/17/2019      

Name/Title/Organization:       Jamie Cox, P.G. - Division Manager        
      Spectrum Environmental, Inc.      

Certifying Officer Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Name/Title:       Trey Baxter, President      

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



U.S. Department of Housing and Urban  
Development  
451 Seventh Street, SW  
Washington, DC 20410  
www.hud.gov  
espanol.hud.gov

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

**Project Information**

**Project Name:** Sam Estess Estates

**Responsible Entity:** Madison County

**Grant Recipient (if different than Responsible Entity):** MS Regional Housing Authority VI

**State/Local Identifier:** Mississippi - MS058

**Preparer:** Spectrum Environmental, Inc.

**Certifying Officer Name and Title:**

**Grant Recipient (if different than Responsible Entity):** MS Regional Housing Authority VI

**Consultant (if applicable):** Spectrum Environmental, Inc.

**Direct Comments to:** Richard Johnson

**Project Location:**

131 King Ranch Road, Canton, Mississippi 39046

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

The Proposed project will consist of renovations to the existing apartment complex.

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

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

The site currently contains 40 single unit buildings.

**Funding Information**

Grant Number	HUD Program	Funding Amount
MS26P058501-16	2016 Capital Funds	\$195,264
MS26P058501-17	2017 Capital Funds	\$195,312
MS058-00000617D	2017 Operating Subsidy	\$441,764
	PHA Funds - Reserves	\$1,200,000
	Administrative Funds	\$4,800,000
	RAD/PBV	\$257,760

**Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]:**

**\$31,900,484**

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

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

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24	Are formal compliance steps or	Compliance determinations
--	--------------------------------------	---------------------------

CFR §58.5 and §58.6	mitigation required?	No
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6</b>		
<b>Airport Hazards</b>	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	
24 CFR Part 51 Subpart D		
<b>Coastal Barrier Resources</b>	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	
Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]		
<b>Flood Insurance</b>	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	
Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]		
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 &amp; 58.5</b>		
<b>Clean Air</b>	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	
Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93		
<b>Coastal Zone Management</b>	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	
Coastal Zone Management Act, sections 307(c) & (d)		
<b>Contamination and Toxic Substances</b>	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	
24 CFR Part 50.3(i) & 58.5(i)(2)		
<b>Endangered Species</b>	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	
Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402		
<b>Explosive and Flammable Hazards</b>	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	
24 CFR Part 51 Subpart C		

<b>Farmlands Protection</b>	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	
Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658		
<b>Floodplain Management</b>	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	
Executive Order 11988, particularly section 2(a); 24 CFR Part 55		
<b>Historic Preservation</b>	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	
National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800		
<b>Noise Abatement and Control</b>	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	
Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B		
<b>Sole Source Aquifers</b>	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	
Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149		
<b>Wetlands Protection</b>	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	
Executive Order 11990, particularly sections 2 and 5		
<b>Wild and Scenic Rivers</b>	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	
Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)		
<b>ENVIRONMENTAL JUSTICE</b>		
<b>Environmental Justice</b>	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	
Executive Order 12898		

**Environmental Assessment Factors** [24 CFR 58.40; Ref. 40 CFR 1508.8 & 1508.27] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and



supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. All conditions, attenuation or mitigation measures have been clearly identified.

**Impact Codes:** Use an impact code from the following list 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
<b>LAND DEVELOPMENT</b>		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	The site contains preexisting structures that will be renovated. There will be no clearing or new construction associated with this project, therefore impacts to any potential threatened and/or endangered species would be unlikely.
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	The site contains preexisting structures that will be renovated. There will be no clearing or new construction associated with this project, therefore impacts to any potential threatened and/or endangered species would be unlikely. <span style="float: right;">2</span>
Hazards and Nuisances including Site Safety and Noise	2	The site contains preexisting structures that will be renovated. There will be no clearing or new construction associated with this project, therefore impacts to any potential threatened and/or endangered species would be unlikely.
Energy Consumption	2	No impacts are anticipated.

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>SOCIOECONOMIC</b>		
Employment and Income Patterns	2	No impacts are anticipated.
Demographic Character Changes, Displacement	2	No impacts are anticipated.

Environmental Assessment Factor	Impact Code	Impact Evaluation
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<b>COMMUNITY FACILITIES AND SERVICES</b>		
Educational and Cultural Facilities	2	No impacts are anticipated.
Commercial Facilities	2	No impacts are anticipated.
Health Care and Social Services	2	No impacts are anticipated.
Solid Waste Disposal / Recycling	2	No impacts are anticipated.
Waste Water / Sanitary Sewers	2	No impacts are anticipated.
Water Supply	2	No impacts are anticipated.
Public Safety - Police, Fire and Emergency Medical	2	No impacts are anticipated.
Parks, Open Space and Recreation	2	No impacts are anticipated.
Transportation and Accessibility	2	No impacts are anticipated.

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>NATURAL FEATURES</b>		
Unique Natural Features, Water Resources	2	There will be no clearing or new construction associated with this project, therefore, no impacts are anticipated.
Vegetation, Wildlife	2	There will be no clearing or new construction associated with this project, therefore, no impacts are anticipated.
Other Factors	2	There will be no clearing or new construction associated with this project, therefore, no impacts are anticipated.

**Additional Studies Performed:**

**Field Inspection** (Date and completed by): Field inspection completed by Richard Johnson on July 11, 2017

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

Environmental Data Resources (EDR), Maintenance Staff, Property Owner and Local Fire Department.

**List of Permits Obtained:**

N/A

**Public Outreach [24 CFR 50.23 & 58.43]:**

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

N/A

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

N/A

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

N/A

**Summary of Findings and Conclusions:**

It is our opinion that there will be no environmental impacts from the proposed project.

**Mitigation Measures and Conditions [40 CFR 1505.2(c)]**

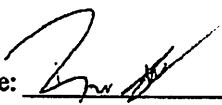
Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development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

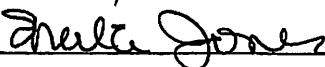
**Determination:**

**Finding of No Significant Impact** [24 CFR 58.40(g)(1); 40 CFR 1508.27]  
 The project will not result in a significant impact on the quality of the human environment.

**Finding of Significant Impact** [24 CFR 58.40(g)(2); 40 CFR 1508.27]  
 The project may significantly affect the quality of the human environment.

Preparer Signature:  Date: 7/26/17

Name/Title/Organization: Richard Johnson / Staff Scientist /  
Spectrum Environmental, Inc.

Certifying Officer Signature:  Date: 2/5/18

Name/Title: Sheila Jones, President

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