



U.S. Department of Housing and Urban
Development
451 Seventh Street, SW
Washington, DC 20410
www.hud.gov
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Environmental Assessment Determinations and Compliance Findings for HUD-assisted Projects 24 CFR Part 58

Project Information

Project Name: 18-06-YWCA-Facility-Expansion

HEROS Number: 900000010063685

Project Location: 1800 S 3rd St W, Missoula, MT 59801

Additional Location Information:

The subject property is located in the heart of Missoula, Missoula County, Montana, approximately 0.6 miles south of the Clark Fork River, approximately 0.7 miles east of Reserve St., and 0.25 miles west of Russell St. It is made up of two parcels totaling 1.65 acres in size. Both parcels are rectangular in shape. There are several structures on the property, including an automobile repair shop, a Quonset hut housing a video gaming repair business, a shed and temporary office building.

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

YWCA Missoula proposes new construction of a 36,000 square foot, fully accessible building to include 25 family housing rooms, and a 13-room Domestic Violence Shelter. The project includes overflow space that can accommodate up to 6 families. Total project cost estimate is \$12,765,000, which includes a construction estimate of \$7,932,181. This CDBG request is for construction costs only. YWCA owns the site, sewer and water are available. Zoning allows the domestic violence shelter, and the family housing center as a conditional use. The site is centrally located at 1800 S. Third Street West, within walking distance to schools, grocery stores, public transportation, and employment opportunities. YW@HOME serves 100% LMI households.

Funding Information

Grant Number	HUD Program	Program Name
18-06	Community Planning and Development (CPD)	Community Development Block Grants (CDBG) (Entitlement)

Estimated Total HUD Funded Amount: \$350,000.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$12,765,000.00

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

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

Law, Authority, or Factor	Mitigation Measure or Condition
Noise Abatement and Control	<p>Per Section 51.104a , Assumption is that standard construction provides an average of 20 db of attenuation. At 65 DNL or below this amount, 20 db attenuation is sufficient to meet the desired 45 db interior level, which is described in section 51.101: General Policy.</p> <p>Per section 51.103: Criteria and Standards, a site with a DNL between 65 and 70 requires 5db of additional attenuation. Based upon a DNL of 69.8, this means that the proposed YWCA building requires 5 db + 20 db = a total of 25db of attenuation along 3rd Street, the street with the calculated DNL of 69.8. The inhabited exterior yard space is towards the North portion of the site, and is buffered by the mass of the building from 3rd Street.</p> <p>The proposed wall construction is:</p> <ul style="list-style-type: none"> - 5/8 inch gypsum board - 2x6 wood studs with blown in insulation - 2 inch rigid exterior insulation - siding varies <p>The estimated STC rating of this wall assembly is STC45. The estimated STC rating for our window type is STC 30. We have 4350 ft sq of wall facing 3rd St. and 660 ft sq of window and door in that wall. The window ratio is 15%. Using the chart in Figure 17 of Chapter 4, we therefore subtract 9 db from the STC of the wall, which yields an effective STC of the composite barrier to be STC 36. The effective STC of 36 is 11 db greater than the required attenuation of 25, therefore the current design is sufficient to exceed HUD requirements.</p>
Permits, Reviews, and Approvals	Once a site plan for the YWCA Project is completed, the project will be submitted to the City for all appropriate permitting including demolition, building, and any other necessary permits.

Mitigation Plan

The CDBG grant will be managed by Montana James, Grants Administrator III, with the City of Missoula Office of Housing & Community Development (HCD). HCD will help ensure that URA, noise mitigation, and Development Services requirements have been met. City of Missoula Development Services will oversee permitting approval. The YWCA has already been in communication with Development Services regarding this project and will obtain all necessary approvals before commencing construction. Overall, Eran Fowler Pehan, HCD Director, is the Environmental Certifying Officer and will oversee all efforts related to mitigation with this project.

Determination:

<input checked="" type="checkbox"/>	Finding of No Significant Impact [24 CFR 58.40(g)(1); 40 CFR 1508.13] The project will not result in a significant impact on the quality of human environment
<input type="checkbox"/>	Finding of Significant Impact

Preparer Signature: Eran Pehan Date: 10/25/19

Name / Title / Organization: Eran Pehan / / MISSOULA

Certifying Officer Signature: Eran Pehan Date: 10/25/19

Name / Title: Director, Housing and Comm. Dev.

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

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

Project Information

Project Name: 18-06-YWCA-Facility-Expansion

HEROS Number: 900000010063685

Responsible Entity (RE): MISSOULA, OFFICE OF PLANNING & GRANTS MISSOULA MT,
59802

RE Preparer: Eran Pehan

State / Local Identifier:

Certifying Officer: Eran Pehan

Grant Recipient (if different than Responsible Entity):

Point of Contact:

Consultant (if applicable):

Point of Contact:

Project Location: 1800 S 3rd St W, Missoula, MT 59801

Additional Location Information:

The subject property is located in the heart of Missoula, Missoula County, Montana, approximately 0.6 miles south of the Clark Fork River, approximately 0.7 miles east of Reserve St., and 0.25 miles west of Russell St. It is made up of two parcels totaling 1.65

acres in size. Both parcels are rectangular in shape. There are several structures on the property, including an automobile repair shop, a Quonset hut housing a video gaming repair business, a shed and temporary office building.

Direct Comments to:

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

YWCA Missoula proposes new construction of a 36,000 square foot, fully accessible building to include 25 family housing rooms, and a 13-room Domestic Violence Shelter. The project includes overflow space that can accommodate up to 6 families. Total project cost estimate is \$12,765,000, which includes a construction estimate of \$7,932,181. This CDBG request is for construction costs only. YWCA owns the site, sewer and water are available. Zoning allows the domestic violence shelter, and the family housing center as a conditional use. The site is centrally located at 1800 S. Third Street West, within walking distance to schools, grocery stores, public transportation, and employment opportunities. YW@HOME serves 100% LMI households.

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

The current YWCA Missoula domestic violence shelter offers seven small bedrooms for residents, for a total of 2,555 nights of shelter availability each year. From July 1, 2015 - June 30, 2016, the YWCA provided shelter to 178 adult female and four adult male survivors of domestic violence. The women stayed an average of 27.5 nights at the shelter and the men stayed in local motel rooms for an average of 17 nights. In order to accommodate all the families and adults, women and men without dependent children, in their own private room in FY16 would have required 14 separate bedroom units. In FY17, 100 women without children stayed an average of 16 nights, 56 women with dependent children stayed an average of 21 nights, and three men stayed an average of 12 nights in motels. To accommodate them all in their own private rooms would have required eight shelter rooms. This may seem to be a significant decrease in need from the FY16 numbers, but there is a notable trend. In FY17, 58 shelter residents (37%) reported leaving the shelter early, not because they had resolved their safety or housing crisis, but because the shelter environment was too stressful. The YWCA began tracking this statistic in FY17 after observing anecdotally that women, especially women with children, found the cramped quarters and lack of privacy too overwhelming to continue their stays at the shelter. Based on the program statistics from the last two fiscal years that indicated a need of 8 - 14 rooms for domestic violence shelter, the YWCA adopted a building design that includes a Domestic Violence Shelter with 16 units, five of which will be flexed to house domestic violence survivors and/or homeless families as appropriate. When not being used, one of the rooms will provide sleeping space for overnight volunteers. From July 1, 2015 - June 30, 2017, the YWCA housed 161 homeless families with 50-day stays in motel rooms. An additional 472 literally homeless families requested emergency housing and were provided short-term (1 - 3 night) stays because

the YWCA did not have enough of the longer-term rooms to shelter them. In total, an average of 319 literally homeless families requested shelter from the YWCA each of the last two years. A minority of the families on the YWCA waiting list, who were not provided 50-day stays, were eventually sheltered by Family Promise or the Union Gospel Mission. The YWCA anticipates that the number of literally homeless families will be slightly reduced over the next two to three years because of the City's Coordinated Entry System, diversion strategies being employed by homeless service providers, and the amount of Rapid Rehousing rent assistance funds available for the population. Working with a family shelter steering committee, the Missoula Interfaith Collaborative conducted an analysis of the service numbers and wait lists for the homeless housing providers 2016 (matrix attached). Based on the matrix and the YWCA statistics from FY16 - FY 17, the YWCA concluded that an average of 319 families will request shelter each year, and 30% of those families will be successfully diverted from emergency housing. The remaining 223 families will each require an average stay of 45 days for a total of 10,048 nights per year (319 families x .7 non-diverted x 45 = 10,048 nights.) To accommodate 10,048 nights of shelter each year will require 28 family rooms (10,048/365 = 28 rooms.) Based on these assumptions, and the recognition that family entry into the shelter will not proceed in an even distribution throughout the year, the YWCA adopted a building design that includes a Family Housing Center with 31 units of homeless family housing. When not being used, one of the rooms will provide sleeping space for overnight volunteers.

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

The site is currently a commercial property housing two businesses (an auto shop and game store). There are commercial businesses on each side of the property, including a pet walking business and plant nursery. The site itself is currently underutilized and in need of improvements, which is what the YWCA Facility Expansion project will accomplish. In terms of the larger neighborhood context, there are a number of features and resources near the site that are beneficial to the YWCA intended use, including: - Parks & Trails: The project site is 0.13 miles from the Milwaukee Trail, 1.2 miles from Lafray Park, 0.4 miles from the Milwaukee Trail Community Garden, 1.0 mile from the River Road Community Garden, 0.6 miles from Silver Park, and 1.0 mile from McCormick Park. - Community Resources: The project site is 0.32 miles from the Missoula Food Bank, 0.6 miles from Home ReSource, 1.0 mile from Garden City Harvest, 0.4 miles from the Salvation Army, 1.5 miles from St. Patrick Hospital and Western Montana Clinic NowCare, and 2.0 miles from Missoula Fire Department Station Four. - Grocery Stores: The project site is 0.3 miles from the Good Food Store, 1.6 miles from the Missoula Fresh Market on Broadway, and 1.9 miles from Albertson's at Trempers Shopping Center - Schools: The project site is 0.3 miles from Sussex Elementary School (private) and 1.5 from Lowell Public Elementary School. The trends that are likely to continue in the absence of this project are increased redevelopment of land in this area. Throughout Missoula, mobile home parks often offer the most affordable housing in the

city. This particular neighborhood, known as the River Road Neighborhood, features a number of mobile home parks. There is a constant risk that developers will purchase these parcels and redevelop them into housing that would be unaffordable for the current residents of these parks and for many Missoula residents. Additionally, as this neighborhood develops more, and more amenities are located here keeping a good mix of residential and commercial will be beneficial. The YWCA expansion project seeks to provide high quality and accessible emergency housing to families and survivors of family violence in a location that gives them the opportunity to rebuild their lives while preserving and improving the mixed-use nature of the neighborhood. Short-term transitional housing is an incredibly important link in the continuum of housing options necessary to improve affordability and access to safe and appropriate homes for all Missoulians. This project fits well into the City's forthcoming Housing Policy by providing targeted and specialized interventions and options for individuals experiencing homelessness and those at risk of homelessness. Homes build strong communities, and providing appropriate access to a full continuum of housing types improves affordability throughout the spectrum.

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

[Phase 1 1800 S 3RD ST W ESA FINAL 8-1-17\(1\).pdf](#)

Determination:

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

Approval Documents:

[Signed EA.pdf](#)

7015.15 certified by Certifying Officer

on:

7015.16 certified by Authorizing Officer

on:

Funding Information

Grant / Project Identification Number	HUD Program	Program Name
18-06	Community Planning and	Community Development Block Grants

	Development (CPD)	(CDBG) (Entitlement)
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**Estimated Total HUD Funded,
Assisted or Insured Amount:** \$350,000.00

**Estimated Total Project Cost [24 CFR 58.2 (a)
(5)]:** \$12,765,000.00

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

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6	Are formal compliance steps or mitigation required?	Compliance determination (See Appendix A for source determinations)
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6		
Airport Hazards Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements.
Coastal Barrier Resources Act Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is located in a state that does not contain CBRS units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with flood insurance requirements.
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5		
Air Quality Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project's county or air quality management district is in non-attainment status for the following: Carbon monoxide, Particulate Matter, <10 microns. This project does not exceed de minimis emissions levels or

		the screening level established by the state or air quality management district for the pollutant(s) identified above. The project is in compliance with the Clean Air Act. Email consultations with Benjamin Schmidt, Air Quality Specialist, Missoula City-County Health Department, are attached.
Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is located in a state that does not participate in the Coastal Zone Management Program. Therefore, this project is in compliance with the Coastal Zone Management Act.
Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Site contamination was evaluated as follows: ASTM Phase I ESA. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. The project is in compliance with contamination and toxic substances requirements.
Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project will have No Effect on listed species because there are no listed species or designated critical habitats in the action area. This project is in compliance with the Endangered Species Act.
Explosive and Flammable Hazards Above-Ground Tanks)[24 CFR Part 51 Subpart C	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There is a current or planned stationary aboveground storage container of concern within 1 mile of the project site. The Separation Distance from the project is acceptable. The project is in compliance with explosive and flammable hazard requirements. The City of Missoula Office of Housing and Community Development (HCD) consulted with Travis Ross with the Missoula Valley Water Quality District within the Missoula City-County Health Department. Mr. Ross noted that two sites within 1 mile of the proposed project site contain aboveground storage containers: Jiffy Lube 1935 Cooper St. 700 Gallon Waste Oil Tank

		600 Gallon Above Ground Storage Tank City of Missoula Water 1345 W. Broadway St. 58,000 Gallon Diesel 6x12,000 gallon, 1x500 gallon, 1x250 gallon AST HCD used the Acceptable Separation Distance Assessment Tool on HUDExchange to calculate the ASD and all tanks are located at an acceptable distance. Please see attachments for further ASD documentation.
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The soil at the project site is considered Urban Land according to the USDA Web Soil Survey. The project is in compliance with the Farmland Protection Policy Act.
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project does not occur in a floodplain. The project is in compliance with Executive Order 11988.
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Based on the project description the project has No Potential to Cause Effects. The project is in compliance with Section 106.
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project is construction of a new domestic violence and family homeless shelter. A Preliminary Screening was performed, and found the following: See attached. Based on narrative from the architects, their building materials and methods will mitigate noise effectively. The project is in compliance with HUD's Noise regulation with mitigation.
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project is located on a sole source aquifer. Following consultation with the regional EPA office, it has been determined that this project will not contaminate the aquifer and create a significant hazard to public health. The project is in compliance with Sole Source Aquifer requirements.
Wetlands Protection Executive Order 11990, particularly	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project will not impact on- or off- site wetlands. The project is in

<p>sections 2 and 5</p>		<p>compliance with Executive Order 11990. The Department of the Army Corp of Engineers, Omaha District, was consulted in making this determination. Attached you will find a letter with an approved jurisdiction determination and the accompanying approved jurisdiction determination form.</p>
<p>Wild and Scenic Rivers Act Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act. The City of Missoula Office of Housing and Community Development (HCD) maintains on file documents regarding the project's compliance with the National Wild and Scenic River Act and a related Presidential Directive. As is evident from this document, the nearest NRI segment (Rattlesnake Creek) is five miles upstream from the project. As the project is a small development in the middle of Missoula's urban core and not adjacent to any rivers listed in the attachment, no impact is anticipated. The Wild and Scenic River closest to Missoula is the South Fork of the Flathead River, which is separated from the project by 47 miles of rugged terrain and significant hydrologic divide (Blackfoot / Flathead) and, therefore, no impact on the South Fork is anticipated from this project.</p>
<p>HUD HOUSING ENVIRONMENTAL STANDARDS</p>		
<p>ENVIRONMENTAL JUSTICE</p>		
<p>Environmental Justice Executive Order 12898</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>No adverse environmental impacts were identified in the project's total environmental review in relation to any of the above related law and authorities. It is not anticipated that this project will have any adverse impact on minority or low-income populations. The project is in compliance with Executive Order 12898.</p>

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

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

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

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	1	In a letter dated 11/30/18 Tom Zavitz, Senior Planner with the City of Missoula, stated \\ The City of Missoula Development Services, Planning Division is supportive of the proposed Domestic Violence Shelter and Family Housing Center project in Missoula's River Road Neighborhood. The proposed project is compliant with City planning efforts. The development fits with city interests in providing safe, affordable housing for low income and homeless families within the core of our community.\\ Mr. Zavitz goes on to say \\This proposed project will be served by existing streets and roads, and existing utilities. The development will also help to revitalize the existing neighborhood. The proposed development is also consistent with the Community Mixed Use land use designation for the area, which encourages high residential density and a	None Required.

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>mix of residential and commercial community uses. The proposed project fits the land use designation well because it is a place where people can live safely and access basic neighborhood and community services without the use of an automobile. The project is consistent with 2035 \\our Missoula\\ Growth Policy goals and objectives to increase the overall supply of decent, safe housing for low-income homeless and unsheltered persons. The project also is consistent with the \\Focus Inward\\ policy that encourages higher residential density in the core of the city.\\ The project was required to obtain a conditional use permit for the family shelter portion of the project, which was approved on December 3, 2018 by the City Council.</p>	
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2	<p>This is a standard level lot in the urban core. No impact is anticipated on soil suitability, slope, erosion, drainage, storm water runoff. The USDA Web Soil Survey revealed that soils at this site are designated as \\Urban Land\\ (see attachment)</p>	None Required.
Hazards and Nuisances including Site Safety and Site-Generated Noise	1	<p>This project will benefit hazards and nuisances. The site is currently used as an auto repair shop, a video gaming repair shop, and</p>	None Required.

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>intermittently as an auto sales lot. Converting the site use to a supportive community center for families and survivors of domestic violence will contribute to the community. As stated in the November 13 community member letter supporting the facility's conditional use permit for the family shelter portion of the project: \\The YWCA joins a long list of service-oriented organizations in our neighborhood including the Missoula Food Bank, the Salvation Army, Garden City Harvest, Home Resource, MUD, the Lifelong Learning Center, Frank's Little Farm, Council Groves, and Homeward.\\ Additionally, the Phase I found no RECs on the property indicating no existing hazards.</p>	
Energy Consumption/Energy Efficiency	1	<p>The project location is in close proximity to transit, shopping, services, and employment locations. It has access to existing utility and streets and roads. Each of these elements minimize energy consumption. In addition, per the project architect, \\The YWCA Missoula project will exceed energy code requirements (IECC 2012). The design team is currently working on specifying the exact equipment, building envelope, and other features and will work to maximize the energy</p>	None Required.

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		efficiency of the building.\	
SOCIOECONOMIC			
Employment and Income Patterns	2	The expanded YWCA facility will have the capacity to house 13 domestic violence survivors and their children and can accommodate 31 families in the family shelter. Part of the value of this parcel of land for this use is its connectivity for those being served to transit, services, and job centers. However each family staying at the facility will be there temporarily, ranging from 30 days to a few months. Due to the scale and temporary nature of the facility's services and the low unemployment rate in Missoula (2.9% as of October 2018) the project is not anticipated to have any affect on employment and income patterns in the area.	None Required.
Demographic Character Changes / Displacement	3	The expanded YWCA facility will have the capacity to house 13 domestic violence survivors and their children and can accommodate 31 families in the family shelter. However each family staying at the facility will be there temporarily, ranging from 30 days to a few months. Due to the scale and temporary nature of the facility's services the project is not anticipated to have any effect on demographics in the area. The change in use on the site from automobile repair and video gaming repair to family	The YWCA is following all required Uniform Relocation Act (URA) protocols and procedures for the existing business tenants on the property. They will provide required notice, collect claim forms, and retain the estimated relocation costs for the businesses through the 18 months required for non-residential URA tenants.

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>services will improve the character of the area from a commercial strip to a mixed-use and diverse area. The current businesses on the site will be displaced by the project, and the YWCA is following all Uniform Relocation Act (URA) guidelines and policies to support the businesses through this displacement.</p>	
COMMUNITY FACILITIES AND SERVICES			
<p>Educational and Cultural Facilities (Access and Capacity)</p>	<p>2</p>	<p>The project site is .3 miles from Sussex School and 1.7 miles from Lowell Elementary School. The expanded YWCA facility will have the capacity to house 13 domestic violence survivors and their children and can accommodate 31 families in the family shelter. However, all residents of the facility will be there temporarily, ranging from 30 days to a few months. Due to the temporary nature of the services provided no significant impact on education and cultural facilities access and capacity is anticipated.</p>	<p>None Required.</p>
<p>Commercial Facilities (Access and Proximity)</p>	<p>2</p>	<p>The expanded YWCA facility will have the capacity to house 13 domestic violence survivors and their children and can accommodate 31 families in the family shelter. However, all residents of the facility will be there temporarily, ranging from 30 days to a few months. Due to the temporary nature</p>	<p>None Required.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>of the services provided it can be assumed that there will be no significant impact on surrounding commercial facilities. Residents of the proposed facility, however, will benefit from access to a number of commercial facilities. The project site is 0.3 miles from the Good Food Store, 1.6 miles from the Missoula Fresh Market on Broadway, and 1.5 miles from Albertson's at Trempers Shopping Center. There are also many other businesses in the area include auto parts stores, restaurants, plant nurseries, and pet grooming and boarding shops.</p>	
<p>Health Care / Social Services (Access and Capacity)</p>	<p>2</p>	<p>Clients of the YWCA will benefit greatly from improved access to a number of health care and social services due to the development of this new facility. The project site is 0.5 miles from the Missoula Food Bank, 0.6 miles from Home ReSource, 1.0 mile from Garden City Harvest, 0.4 miles from the Salvation Army, 1.7 miles from St. Patrick Hospital and Western Montana Clinic NowCare. Additionally, the City just moved much of the Police Department operations just down the road from the new facility on S. Catlin St., improving access to police services. The YWCA facility's location is not anticipated to impact service providers.</p>	<p>None Required.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>Neighbor to the current shelter, Nick Schontz commented in his public comment for the YWCA's conditional use permit that \\... not only have they not had safety-related issues at their current facility but building the new facility as a public-facing entity will only help in this area.\\ The YWCA project is not anticipated to have any impact on Health Care or Social Services.</p>	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	2	The site is served by a solid waste disposal service, and contributes insignificantly to saturation of that system's capacity.	None Required.
Waste Water and Sanitary Sewers (Feasibility and Capacity)	2	The site is served by a City sewer, and contributes insignificantly to saturation of that system's capacity.	None Required.
Water Supply (Feasibility and Capacity)	2	This site is served by City water services, and contributes insignificantly to the usage of that system's capacity. Approximately 705 square feet of intermittent streams are present on this site. These waters are not regulated under Section 404 of the Federal Clean Water Act, since they are isolated waters. An approved jurisdictional determination has been made by the Army Corp of Engineers.	None Required.
Public Safety - Police, Fire and Emergency Medical	2	The YWCA Expansion project is not anticipated to create a significant burden on police, fire or health care providers in	None Required.

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>terms of manpower and/or equipment. The proposed site is proximal to a number of public safety resources including: 1.7 miles from St. Patrick Hospital and Western Montana Clinic NowCare; 2.2 miles from Missoula Fire Department Station Four; and 1.9 miles from the main Missoula Police Department. Additionally, the City just moved much of the Police Department operations just down the road from the new facility on S. Catlin St., improving access to police services. Neighbor to the current shelter, Nick Schontz commented in his public comment for the YWCA's conditional use permit that \\... not only have they not had safety-related issues at their current facility but building the new facility as a public-facing entity will only help in this area.\\</p>	
Parks, Open Space and Recreation (Access and Capacity)	2	<p>The expanded YWCA facility will have the capacity to house 13 domestic violence survivors and their children and can accommodate 31 families in the family shelter. Given the moderate scope of this project, there will be some increase in usage of parks, open space, and recreation due to the YWCA facility expansion. The proposed site is proximal to a number of parks and recreational</p>	None Required.

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>facilities, including: 0.4 miles from the Milwaukee Trail, 1.2 miles from Lafray Park, 0.4 miles from the Milwaukee Trail Community Garden, 1.0 mile from the River Road Community Garden, 1.1 miles from Silver Park, and 1.3 miles from McCormick Park. However, the site design for the facility includes two extensive back yards and play areas solely for the use of YWCA residents - one for the family shelter and one for the domestic violence shelter. These yards include a number of features including play structures, trees, shrubs, and garden space. These resources included in the project will reduce impacts on neighborhood parks and open space. As such, no significant impact on existing parks and open space is anticipated.</p>	
<p>Transportation and Accessibility (Access and Capacity)</p>	<p>2</p>	<p>The YWCA facility by City of Missoula zoning requirements is required to include 40 parking spaces. The project site design includes space for 75 parking spots in order to reduce its impact on neighborhood parking. The site will also include 13 bike parking spaces. The proposed site is proximal to Mountain Line bus routes on Russell Street (Route 2 - Montana St and Russell - 0.7 miles), 3rd Street (Route 9 - S 3rd W and S Catlin - 0.1 miles), and</p>	<p>None Required.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		Broadway (Routes 11 and 14 - Russell and Broadway - 1.1 miles). Mountain Line offers zero-fare service to all riders. The proposed site is also 0.4 miles from the Milwaukee Trail (bicycle and pedestrian trail). This extensive access to parking and transit suggests that the project will not have significant impact on existing transportation and accessibility in the area.	
NATURAL FEATURES			
Unique Natural Features /Water Resources	2	The proposed project site is an existing lot in the urban core of Missoula with no unique natural features or water resources.	None Required.
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	2	The proposed project site is an existing lot in the urban core of Missoula with no anticipated impact on vegetation or wildlife.	None Required.
Other Factors	2	None.	None.

Supporting documentation

[NWO-2018-02028-AJD-Packet-Letter\(1\).pdf](#)

[2018_1220 EPA Region 8 Reply\(1\).pdf](#)

[Conditional Use Application 1.pdf](#)

[2018_1203 City Council Action Summary CU Approved.pdf](#)

[Nick Shontz Public Comment.pdf](#)

Additional Studies Performed:

None.

Field Inspection [Optional]: Date and completed

by:

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

Agencies and Persons Consulted: Confederated Salish and Kootenai Tribes of the Flathead Reservation, Ron Trahan, Chairperson Confederated Salish and Kootenai Tribes of the Flathead Reservation, Ira Matt, Tribal Preservation Officer Nez Perce Tribe, Patrick Baird, THPO Nez Perce Tribe, Shannon, Wheeler, Tribal Chairman Apache Tribe of Oklahoma, Bob Komardley, Chairman Fort Belknap Indian Community of the Fort Belknap Reservation of Montana, Andy Werk, President Fort Belknap Indian Community of the Fort Belknap Reservation of Montana, Michael Blackwolf, THPO U.S. Fish & Wildlife Service, Jodi L. Bush, Field Supervisor National Park Service, Attila Bality, Rivers, Trails and Conservation Assistance US Army Corps of Engineers - Omaha District, Todd N. Tillinger, P.E., Montana State Program Manager National Resources Conservation Service, Tom Watson, State Resource Conservationist U.S. Environmental Protection Agency, Region 8, Marcella Hutchinson, SWP/SSA Coordinator Montana Department of Environmental Quality, Jason Seyler, DEQ Brownfields Coordinator Montana Department of Commerce Community Development Division, Jennifer Olson, Division Administrator Montana Environmental Quality Council Montana Department of Fish, Wildlife & Parks Resource Assessment Unit Montana Department of Fish, Wildlife & Parks Region 2, Torrey Ritter, Nongame Biologist Montana Natural Heritage Program, Bryce Maxell Montana Department of Natural Resources & Conservation, Cori Gray Montana State Historic Preservation Office, Pete Brown, Historical Architect City of Missoula Development Services, Laval Means, Planning Manager City of Missoula Historic Preservation, Emily Scherrer, Historic Preservation Officer Missoula Conservation District, Jen McBride, Resource Conservationist City of Missoula Development Services, Anita McNamara, Planner III / Floodplain Administrator Missoula Valley Water Quality District, Travis Ross, Environmental Health Specialist Missoula City County Health Department, Shannon Therriault, Environmental Health Sources: RCRA Info Search - <https://www3.epa.gov/enviro/facts/rcrainfo/search.html> National Wetlands Inventory - <https://www.fws.gov/wetlands/data/Mapper.html> FEMA Floodplain Maps - <http://fema.maps.arcgis.com/home/webmap/viewer.html?webmap=cbe088e7c8704464aa0fc34eb99e7f30&extent=-114.0930568735838,46.84224335610141,-113.92688866069342,46.88097732543965> U.S. Fish & Wildlife Service Endangered Species - <https://www.fws.gov/endangered/species/index.html> USDA Web Soil Survey - <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx> Google Maps - www.maps.google.com Missoula County Property Information System - <https://gis.missoulacounty.us/propertyinformation/> Montana Department of Transportation Data System - <http://mdt.ms2soft.com/tcds/tsearch.asp?loc=Mdt&mod=>

List of Permits Obtained:

Zoning Approval - This project site, zoned C1-4 Neighborhood Commercial, is zoned properly for the Service Center and Domestic Violence Shelter uses. However, it had to undergo a conditional use permitting process for Group Living Conditional Use Permit for the Family Housing Center. The applicable regional plan is the Our Missoula 2035 City Growth Policy, which recommends a land use designation of Community Mixed Use, intended for high intensity commercial serving general community needs and high density residential intermixed, which also aligns with the project use. City Demolition and Building Permits - Once a site plan for the YWCA Project is completed, the project will be submitted to the City for all appropriate permitting including demolition, building, and any other necessary permits. Environmental Reviews - As part of the City CDBG grant requirements, a HUD Environmental Assessment must be completed, an Environmental Review Record produced and the Environmental Release of Funds issued.

Public Outreach [24 CFR 58.43]:

MEDIA Legal advertisement appeared in the Missoulian daily newspaper on 12/30/2018 and 01/06/2019 A press release was distributed to local media on 01/03/2019.

CONTACTS The FONSI/NOI/RROF combined dissemination list will include: Confederated Salish and Kootenai Tribes of the Flathead Reservation Nez Perce Tribe Apache Tribe of Oklahoma Fort Belknap Indian Community of the Fort Belknap Reservation of Montana U.S. Fish and Wildlife Service U.S. Army Corps of Engineers - Omaha District U.S. Environmental Protection Agency, Region 8 National Park Service Natural Resource Conservation Service Montana Department of Environmental Quality Montana Department of Commerce Community Development Division Montana Environmental Quality Council Montana Department of Fish, Wildlife, and Parks Montana Department of Natural Resources & Conservation Montana Natural Heritage Program Montana State Historic Preservation Office City of Missoula Development Services City of Missoula Historic Preservation Missoula Conservation District Missoula Valley Water Quality District Missoula City-County Health Department - Environmental Health

Cumulative Impact Analysis [24 CFR 58.32]:

The proposed project location for the YWCA Facility Expansion Project is located within Missoula's urban core in an existing commercial district. The addition of a service center, domestic violence shelter, and family housing center is unlikely to greatly exceed the existing density and capacity of the area. In fact, as confirmed by the Planning Division of Missoula Development Services in conjunction with City Council Approval of the project's conditional use permit, the YWCA facility is compliant with the local zoning for that site.

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

The YWCA closely examined 15 other properties for this YWCA Facility project. All other

properties were eliminated for one of the following reasons: asking price was too high, remote location that did not facilitate good access for their clients, lot size was too small to accommodate the facility, or zoning was incompatible with the intended use. Ultimately, this location fit the most important needs for the project including good transit connectivity, proximity to other services and resources, acceptable pricing, and lot size.

No Action Alternative [24 CFR 58.40(e)]

If this project site were to remain as is, it likely would continue in its current uses as an automobile repair shop, video game repair shop, and storage for the next few years. These are not the highest and best uses for the project site and it likely would be sold and convert to some other commercial use in the near future as the neighborhood continues to develop. Any other such use would not provide the same level of community benefit and contribution to overall city housing needs and service needs as the YWCA facility will.

Summary of Findings and Conclusions:

As evidenced throughout this Environmental Assessment, the YWCA Facility Expansion project aligns with the Our Missoula Growth Policy, Land Use Designations, and Zoning for the proposed project site. Overall, the development is unlikely to have a significant impact on the capacity of existing systems in the neighborhood including water/sewer service, transportation, parks, and other community facilities and services. Rather, the project location is in close proximity to transit, shopping, services, and employment locations. It has access to existing utility and streets and roads. Each of these elements minimize energy consumption and provide multitude resources for the YWCA's clients. No changes to the proposal are necessary to avoid significant impacts.

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

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

Law, Authority, or Factor	Mitigation Measure or Condition	Comments on Completed Measures	Complete
Noise Abatement and Control	Per Section 51.104a , Assumption is that standard construction provides an average of 20 db of attenuation. At 65 DNL or below this amount, 20 db attenuation is sufficient to meet the	N/A	

	<p>desired 45 db interior level, which is described in section 51.101: General Policy.</p> <p>Per section 51.103: Criteria and Standards, a site with a DNL between 65 and 70 requires 5db of additional attenuation. Based upon a DNL of 69.8, this means that the proposed YWCA building requires 5 db + 20 db = a total of 25db of attenuation along 3rd Street, the street with the calculated DNL of 69.8. The inhabited exterior yard space is towards the North portion of the site, and is buffered by the mass of the building from 3rd Street.</p> <p>The proposed wall construction is:</p> <ul style="list-style-type: none"> - 5/8 inch gypsum board - 2x6 wood studs with blown in insulation - 2 inch rigid exterior insulation - siding varies <p>The estimated STC rating of this wall assembly is STC45. The estimated STC rating for our window type is STC 30. We have 4350 ft sq of wall facing 3rd St. and 660 ft sq of window and door in that wall. The window ratio is 15%. Using the chart in Figure 17 of Chapter 4, we therefore subtract 9 db from the STC of the wall, which yields an effective STC of the composite barrier to be STC 36. The effective STC of 36 is 11 db greater than the required attenuation of 25, therefore the current design is sufficient to exceed HUD requirements.</p>		
<p>Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design</p>	<p>None Required.</p>	<p>N/A</p>	
<p>Soil Suitability / Slope/ Erosion /</p>	<p>None Required.</p>	<p>N/A</p>	

Drainage and Storm Water Runoff			
Hazards and Nuisances including Site Safety and Site-Generated Noise	None Required.	N/A	
Energy Consumption/Energy Efficiency	None Required.	N/A	
Employment and Income Patterns	None Required.	N/A	
Demographic Character Changes / Displacement	The YWCA is following all required Uniform Relocation Act (URA) protocols and procedures for the existing business tenants on the property. They will provide required notice, collect claim forms, and retain the estimated relocation costs for the businesses through the 18 months required for non-residential URA tenants.	N/A	
Educational and Cultural Facilities (Access and Capacity)	None Required.	N/A	
Commercial Facilities (Access and Proximity)	None Required.	N/A	
Health Care / Social Services (Access and Capacity)	None Required.	N/A	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	None Required.	N/A	
Waste Water and Sanitary Sewers (Feasibility and Capacity)	None Required.	N/A	
Water Supply (Feasibility and Capacity)	None Required.	N/A	
Public Safety - Police, Fire and Emergency Medical	None Required.	N/A	

Parks, Open Space and Recreation (Access and Capacity)	None Required.	N/A	
Transportation and Accessibility (Access and Capacity)	None Required.	N/A	
Unique Natural Features /Water Resources	None Required.	N/A	
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	None Required.	N/A	
Other Factors	None.	N/A	
Permits, reviews and approvals	Zoning Approval - This project site, zoned C1-4 Neighborhood Commercial, is zoned properly for the Service Center and Domestic Violence Shelter uses. However, it had to undergo a conditional use permitting process for Group Living Conditional Use Permit for the Family Housing Center. The applicable regional plan is the Our Missoula 2035 City Growth Policy, which recommends a land use designation of Community Mixed Use, intended for high intensity commercial serving general community needs and high density residential intermixed, which also aligns with the project use. City Demolition and Building Permits - Once a site plan for the YWCA Project is completed, the project will be submitted to the City for all appropriate permitting including demolition, building, and any other necessary permits. Environmental Reviews - As part of the City CDBG grant requirements, a HUD Environmental Assessment must be completed, an Environmental Review Record produced and the	N/A	

	Environmental Release of Funds issued.		
Permits, Reviews, and Approvals	Once a site plan for the YWCA Project is completed, the project will be submitted to the City for all appropriate permitting including demolition, building, and any other necessary permits.	N/A	

Mitigation Plan

The CDBG grant will be managed by Montana James, Grants Administrator III, with the City of Missoula Office of Housing & Community Development (HCD). HCD will help ensure that URA, noise mitigation, and Development Services requirements have been met. City of Missoula Development Services will oversee permitting approval. The YWCA has already been in communication with Development Services regarding this project and will obtain all necessary approvals before commencing construction. Overall, Eran Fowler Pehan, HCD Director, is the Environmental Certifying Officer and will oversee all efforts related to mitigation with this project.

Supporting documentation on completed measures

APPENDIX A: Related Federal Laws and Authorities

Airport Hazards

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

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

No

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

Yes

Screen Summary

Compliance Determination

The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements.

Supporting documentation

[1800 S. 3rd. W. Map to Airport.PNG](#)

Are formal compliance steps or mitigation required?

Yes

No

Coastal Barrier Resources

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

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

Compliance Determination

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

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Flood Insurance

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

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

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

✓ Yes

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

[FEMA Flood Map for 1800 S. 3rd W..PNG](#)

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

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

Yes

Screen Summary

Compliance Determination

The structure or insurable property is not located in a FEMA-designated Special Flood

Hazard Area. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with flood insurance requirements.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Air Quality

General requirements	Legislation	Regulation
<p>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.</p>	<p>Clean Air Act (42 USC 7401 et seq.) as amended particularly Section 176(c) and (d) (42 USC 7506(c) and (d))</p>	<p>40 CFR Parts 6, 51 and 93</p>

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

Yes

No

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?

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

Yes, project’s management district or county is in non-attainment or maintenance status for the following criteria pollutants (check all that apply):

Carbon Monoxide

Lead

Nitrogen dioxide

Sulfur dioxide

Ozone

Particulate Matter, <2.5 microns

✓ Particulate Matter, <10 microns

3. What are the *de minimis* emissions levels (40 CFR 93.153) or screening levels for the non-attainment or maintenance level pollutants indicated above

Carbon monoxide ppm (parts per million)
Particulate Matter, <10 microns µg/m3 (micrograms per cubic meter of air)

Provide your source used to determine levels here:

The City of Missoula Office of Housing and Community Development consulted with Benjamin Schmidt, Air Quality Specialist with the Missoula City-County Health Department. This Department is responsible for the SIP in Missoula County. Through emails, Mr. Schmidt indicated that the *de minimis* emissions levels do not apply to this project. Mr. Schmidt did indicate the following regarding air quality:

4. Determine the estimated emissions levels of your project. 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.

Enter the estimate emission levels:

Carbon monoxide ppm (parts per million)
Particulate Matter, <10 microns µg/m3 (micrograms per cubic meter of air)

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

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

Screen Summary
Compliance Determination

The project's county or air quality management district is in non-attainment status for the following: Carbon monoxide, Particulate Matter, <10 microns. This project does not exceed de minimis emissions levels or the screening level established by the state or air quality management district for the pollutant(s) identified above. The project is in compliance with the Clean Air Act. Email consultations with Benjamin Schmidt, Air Quality Specialist, Missoula City-County Health Department, are attached.

Supporting documentation

[2018_1227_Missoula_Air_Quality_Reply.pdf](#)

[MT_National_Maps_Combined_Air_Quality.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Coastal Zone Management Act

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

This project is located in a state that does not participate in the Coastal Zone Management Program. Therefore, this project is in compliance with the Coastal Zone Management Act.

Screen Summary

Compliance Determination

This project is located in a state that does not participate in the Coastal Zone Management Program. Therefore, this project is in compliance with the Coastal Zone Management Act.

Supporting documentation

[1800 S. 3rd W. Google Map.PNG](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Contamination and Toxic Substances

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

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

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

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

- No

Explain:

According to the consultant, WGM Group, "based on our investigation, WGM has not identified any RECs at the subject property."

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

Yes

Screen Summary

Compliance Determination

Site contamination was evaluated as follows: ASTM Phase I ESA. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project

occupants or conflict with the intended use of the property were not found. The project is in compliance with contamination and toxic substances requirements.

Supporting documentation

[Phase 1 1800 S 3RD ST W ESA FINAL 8-1-17.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Endangered Species

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

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

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

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

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

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

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

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

Screen Summary

Compliance Determination

This project will have No Effect on listed species because there are no listed species or designated critical habitats in the action area. This project is in compliance with the Endangered Species Act.

Supporting documentation

[2018_1231 MT Fish Wildlife Parks.pdf](#)

[2018_1203 USFWS Jodi Bush Attachment.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Explosive and Flammable Hazards

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

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

No

Yes

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

No

Yes

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

Yes

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

✓ Yes

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

No

Screen Summary

Compliance Determination

There is a current or planned stationary aboveground storage container of concern within 1 mile of the project site. The Separation Distance from the project is acceptable. The project is in compliance with explosive and flammable hazard requirements. The City of Missoula Office of Housing and Community Development (HCD) consulted with Travis Ross with the Missoula Valley Water Quality District within the Missoula City-County Health Department. Mr. Ross noted that two sites within 1 mile of the proposed project site contain aboveground storage containers: Jiffy Lube | 1935 Cooper St. 700 Gallon Waste Oil Tank 600 Gallon Above Ground Storage Tank City of Missoula Water | 1345 W. Broadway St. 58,000 Gallon Diesel 6x12,000 gallon, 1x500 gallon, 1x250 gallon AST HCD used the Acceptable Separation Distance Assessment Tool on HUDExchange to calculate the ASD and all tanks are located at an acceptable distance. Please see attachments for further ASD documentation.

Supporting documentation

[2018_1228_Missoula_Health_Explosive_Flammable_Reply_Attachment.xls](#)

[2018_1228_Missoula_Health_Explosive_Flammable_Reply.pdf](#)

[Distance_to_1935_Cooper_St._Missoula.PNG](#)

[Distance_to_1345_W._Broadway_St._Missoula.PNG](#)

[Acceptable_Separation_Distance_\(ASD\)_Electronic_Assessment_Tool_-_Jiffy_Lube.pdf](#)

[Acceptable_Separation_Distance_\(ASD\)_Electronic_Assessment_Tool_-_City_of_Missoula_Water.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Farmlands Protection

General requirements	Legislation	Regulation
The Farmland Protection Policy Act (FPPA) discourages federal activities that would convert farmland to nonagricultural purposes.	Farmland Protection Policy Act of 1981 (7 U.S.C. 4201 et seq.)	7 CFR Part 658

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

Yes

No

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

The project site is an existing commercial property that is not currently in use as farmland. It is not in an urban agriculture zone.

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

Screen Summary

Compliance Determination

This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The soil at the project site is considered Urban Land according to the USDA Web Soil Survey. The project is in compliance with the Farmland Protection Policy Act.

Supporting documentation

[2018_1206 USDA Web Soil Survey.PNG](#)

Are formal compliance steps or mitigation required?

Yes

No

Floodplain Management

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

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

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

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

[FEMA Flood Map for 1800 S. 3rd W..PNG](#)

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

Does your project occur in a floodplain?

No

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

Yes

Screen Summary

Compliance Determination

This project does not occur in a floodplain. The project is in compliance with Executive Order 11988.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Historic Preservation

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

Threshold

Is Section 106 review required for your project?

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

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

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

Threshold (b). Document and upload the memo or explanation/justification of the other determination below:

Montana State Historic Preservation Office concurred via consultation that "No properties on or eligible for NRHP appear likely to exist within project impact area" on November 30, 2018. Signed by Pete Brown, Montana State Historical Architect.

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

Screen Summary

Compliance Determination

Based on the project description the project has No Potential to Cause Effects. The project is in compliance with Section 106.

Supporting documentation

[2018_1210 Missoula Historic Preservation Officer Reply.pdf](#)

[2018_1130 MT SHPO Historic Architecture Specialist\(1\).pdf](#)

[2018_1130 MT SHPO Historic Architecture Specialist Attachment.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Noise Abatement and Control

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

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.

Rehabilitation of an existing residential property

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

An interstate land sales registration

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

None of the above

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

Indicate the findings of the Preliminary Screening below:

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

- ✓ Noise generators were found within the threshold distances.

5. **Complete the Preliminary Screening to identify potential noise generators in the**

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

- ✓ 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))

Is your project in a largely undeveloped area?

- ✓ No

Indicate noise level here: 69.83

Document and upload noise analysis, including noise level and data used to complete the analysis below.

Yes

Unacceptable: (Above 75 decibels)

HUD strongly encourages conversion of noise-exposed sites to land uses compatible with high noise levels.

Check here to affirm that you have considered converting this property to a non-residential use compatible with high noise levels.

Indicate noise level here: 69.83

Document and upload noise analysis, including noise level and data used to complete the analysis below.

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

✓ Mitigation as follows will be implemented:

Per Section 51.104a , Assumption is that standard construction provides an average of 20 db of attenuation. At 65 DNL or below this amount, 20 db attenuation is sufficient to meet the desired 45 db interior level, which is described in section 51.101: General Policy. Per section 51.103: Criteria and Standards, a site with a DNL between 65 and 70 requires 5db of additional attenuation. Based upon a DNL of 69.8, this means that the proposed YWCA building requires 5 db + 20 db = a total of 25db of attenuation along 3rd Street, the street with the calculated DNL of 69.8. The inhabited exterior yard space is towards the North portion of the site, and is buffered by the mass of the building from 3rd Street. The proposed wall construction is: - 5/8 inch gypsum board - 2x6 wood studs with blown in insulation - 2 inch rigid exterior insulation - siding varies The estimated STC rating of this wall assembly is STC45. The estimated STC rating for our window type is STC 30. We have 4350 ft sq of wall facing 3rd St. and 660 ft sq of window and door in that wall. The window ratio is 15%. Using the chart in Figure 17 of Chapter 4, we therefore subtract 9 db from the STC of the wall, which yields an effective STC of the composite barrier to be STC 36. The effective STC of 36 is 11 db greater than the required attenuation of 25, therefore the current design is sufficient to exceed HUD requirements.

Based on the response, the review is in compliance with this section. Document and upload drawings, specifications, and other materials as needed to describe the project's noise mitigation measures below.

No mitigation is necessary.

Screen Summary

Compliance Determination

The project is construction of a new domestic violence and family homeless shelter. A Preliminary Screening was performed, and found the following: See attached. Based on narrative from the architects, their building materials and methods will mitigate noise effectively. The project is in compliance with HUD's Noise regulation with mitigation.

Supporting documentation

[2018_1023_CrossingInventory_3rd_St_Bitterroot_Line.pdf](#)
[Distance_to_main_RR.PNG](#)
[Distance_to_3rd_St..PNG](#)
[2018_1206_City_DNL_Calculation.pdf](#)
[2018_1019_YWCA_HUD_Calculation_Narrative.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Sole Source Aquifers

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

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

Yes

No

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

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

No

Yes

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

Yes

Document and upload MOU or Agreement below.

No

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. This information will be automatically included in the Mitigation summary for the environmental review. If negative effects cannot be mitigated, cancel the project using the button at the bottom of this screen

Yes

No

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, stormwater 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. Does your MOU or working agreement exclude your project from further review?

No

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

Yes

Screen Summary

Compliance Determination

The project is located on a sole source aquifer. Following consultation with the regional EPA office, it has been determined that this project will not contaminate the aquifer and create a significant hazard to public health. The project is in compliance with Sole Source Aquifer requirements.

Supporting documentation

[HUD EPA MOU 1991.pdf](#)

[2018_1220 EPA Region 8 Reply.pdf](#)

Are formal compliance steps or mitigation required?

18-06-YWCA-Facility-
Expansion

Missoula, MT

900000010063685

Yes

No

Wetlands Protection

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

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

No

✓ Yes

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

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

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

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

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

Screen Summary

Compliance Determination

The project will not impact on- or off-site wetlands. The project is in compliance with Executive Order 11990. The Department of the Army Corp of Engineers, Omaha District, was consulted in making this determination. Attached you will find a letter with an approved jurisdiction determination and the accompanying approved jurisdiction determination form.

Supporting documentation

[NWO-2018-02028-AJD-Packet-Letter.pdf](#)
[2018_1026 NEPAassist Wetlands Site Map.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Wild and Scenic Rivers Act

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

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

✓ No

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

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

Screen Summary

Compliance Determination

This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act. The City of Missoula Office of Housing and Community Development (HCD) maintains on file documents regarding the project's compliance with the National Wild and Scenic River Act and a related Presidential Directive. As is evident from this document, the nearest NRI segment (Rattlesnake Creek) is five miles upstream from the project. As the project is a small development in the middle of Missoula's urban core and not adjacent to any rivers listed in the attachment, no impact is anticipated. The Wild and Scenic River closest to Missoula is the South Fork of the Flathead River, which is separated from the project by 47 miles of rugged terrain and significant hydrologic divide (Blackfoot / Flathead) and, therefore, no impact on the South Fork is anticipated from this project.

Supporting documentation

[2018_1211 NPS WSR Reply.pdf](#)

[2018_1210 Distance from Project to Rattlesnake Creek.PNG](#)

[2018_1026 Wild and Scenic Rivers MT incl list.PNG](#)

[2018_1026 Nationwide Rivers Inventory Missoula.PNG](#)

Are formal compliance steps or mitigation required?

18-06-YWCA-Facility-
Expansion

Missoula, MT

900000010063685

Yes

✓ No

Environmental Justice

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

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

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

Yes

No

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

Screen Summary

Compliance Determination

No adverse environmental impacts were identified in the project's total environmental review in relation to any of the above related law and authorities. It is not anticipated that this project will have any adverse impact on minority or low-income populations. The project is in compliance with Executive Order 12898.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

No