

This ERR will be available through 11/3/2023

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U.S. Department of Housing and Urban  
Development  
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**Environmental Assessment  
Determinations and Compliance Findings  
for HUD-assisted Projects  
24 CFR Part 58**

**Project Information**

**Project Name:** HOME-Belvedere-Terrace-Apts-LIHTC

**HEROS Number:** 900000010357701

**Responsible Entity (RE):** TUCSON, PO Box 27210 Tucson AZ, 85726

**RE Preparer:** Rolanda Mazeika

**State / Local Identifier:**

**Certifying Officer:** Ann Chanecka

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

**Point of Contact:**

**Consultant (if applicable):**

**Point of Contact:**

**Project Location:** 4431 E 22nd St, Tucson, AZ 85711

**Additional Location Information:**

The Belvedere Terrace Apartments project is located at 4431 E 22nd St, Tucson, Pima County, Arizona 85711, Pima County Assessor Parcel Number 126-19-1910. The site is located north of 22nd St between Columbus Blvd and Swan Rd in central Tucson in

the Toumey Park Neighborhood Association. The property description is: FAMILY DOLLAR LOT 2.

**Direct Comments to:** E-mail: [rolanda.mazeika@tucsonaz.gov](mailto:rolanda.mazeika@tucsonaz.gov)  
Mail: City of Tucson, Housing & Community Development  
Department, PO Box 27210, Tucson, Arizona 85726-7210

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

The Belvedere Terrace project provides for the development of affordable senior housing by Newport SW LLC on a currently vacant/undeveloped property in the Toumey Park Neighborhood Association in central Tucson, Arizona. The project includes property acquisition and new construction of a 3-story, 72-unit affordable senior housing complex, a parking lot with a solar parking canopy, a dog park, and a walking path on an approximate 2.2-acre site. The project consists of construction of 66, one-bedroom and 6, two-bedroom apartments to serve adults, ages 55 and over, whose income is no greater than 60% of Area Median Income. An existing cellular tower and enclosure will remain onsite and will not be impacted by the project activities. The project will be allocated 22 Project-Based Vouchers (PBVs) through the City of Tucson Public Housing Authority. The project will also receive Coronavirus State and Local Fiscal Recovery Funds (SLFRF) authorized by the American Rescue Plan Act through the City of Tucson Housing & Community Development Department. Supportive services for qualifying populations will be provided by a third-party provider. The project will be built to National Green Building Standards Silver, or better. The total estimated project cost is \$32,045,488 with an estimated \$5,654,880 of funding for 22 PBVs over 20 years, entitlement number AZ004, through the City of Tucson Public Housing Authority. The Belvedere Terrace Apartments project is located at 4431 E 22nd St, Tucson, Pima County, Arizona 85711, Pima County Assessor Parcel Number 126-19-1910. The site is located north of 22nd St between Columbus Blvd and Swan Rd in central Tucson in the Toumey Park Neighborhood Association. The property description is: FAMILY DOLLAR LOT 2.

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

This project supports the City of Tucson Consolidated Plan policies to develop affordable housing including: Acquisition and/or rehabilitation of affordable rental housing, including energy-efficiency, disability accessibility improvements, temporary or permanent relocation, supportive housing, and HOME-funded transitional housing; construction of affordable rental housing, including supportive housing, HOME transitional housing; and monthly rental assistance. The project serves the program purpose of increasing the supply of much needed affordable housing in the City of Tucson. The project also supports the goals of Plan Tucson, the 2013 City of Tucson General & Sustainability Plan, to provide housing, human services, public facilities, and economic development programs to address the housing needs of the most vulnerable populations ([www.tucsonaz.gov/Departments/Planning-Development-Services/Development-Tools-Resources/Plans#section-1](http://www.tucsonaz.gov/Departments/Planning-Development-Services/Development-Tools-Resources/Plans#section-1)). The site is located in the

29th Street Thrive Zone, a collaborative neighborhood planning effort involving residents, community leaders, and local stakeholders located within the boundaries of South Alvernon Way to South Craycroft Rd between East 22nd St and East Golf Links Rd.

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

This project is located north of East 22nd St between South Columbus Blvd and South Swan Rd with primary access from East 22nd St in central Tucson in the Toumey Park Neighborhood Association. Tucson's regional transit system including Sun Tran, Sun Express, and Sun Van provide service to nearby arterial streets, 22nd St, Swan Rd, and Alvernon Way, and bus stops are within walking distance of the site. One bus line travels east/west along 22nd St, and two bus lines travel north/south along Alvernon Way and Swan Rd. Amenities within walking distance or directly available via the transit system include: medical providers and pharmacies; supermarkets and grocery; retail shopping; and senior/recreation centers. The site is located along the 22nd St commercial corridor and is located within 0.70 miles of two nearby arterial roads, Alvernon Way and Swan Rd. The site is surrounded by commercial development, including buildings and parking lots, to the east, southeast, and west. The adjoining sites consist of the following: North, electric substation followed by residential properties; South are retail stores (Family Dollar, 4433 E 22nd St, and AutoZone, 4451 E 22nd St); East, North Belvedere Ave followed by a small automotive sales/lot and a strip mall/storage complex (Cool Auto Sales, 4511 E 22nd St and 4525 E 22nd St); and West is a flexible-stay apartment complex (Siegel Suites, 4425 E 22nd St). The site is a good choice for housing development based on the current affordable housing crisis as well as its proximity to transit and services. Commercial development/improvements are likely to continue along the arterial roads. Low- to high-density residential use is likely to continue along and within blocks of the arterial routes.

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

- [2023-7-27 22nd Aerial Map.pdf](#)
- [Belvedere Terrace - Arch Line Drawings.pdf](#)
- [2023-8-15 22nd Ph I ESA Site Recon Photos.pdf](#)
- [2022-2-25 22nd Ph I ESA Site Recon Photos.pdf](#)

**Determination:**

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

**Approval Documents:**

- [2023-10-18 Signature Page.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
AZ0004	Public Housing	Project-Based Voucher Program

**Estimated Total HUD Funded,  
Assisted or Insured Amount:** \$5,654,880.00

**Estimated Total Project Cost [24 CFR 58.2 (a)  
(5)]:** \$32,045,488.00

**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)
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 &amp; § 58.6</b>		
<b>Airport Hazards</b> Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project is within 15,000 feet of a military airport or within 2,500 of a civilian airport. However, it is not within an APZ or RPZ/CZ. The project is in compliance with Airport Hazards requirements.
<b>Coastal Barrier Resources Act</b> 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. There are no CBRS units in Arizona. Therefore, this project is in compliance with the Coastal Barrier Resources Act.
<b>Flood Insurance</b> Flood Disaster Protection Act of	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The structure or insurable property is not located in a FEMA-designated

<p>1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]</p>		<p>Special Flood Hazard Area. FEMA Zone X, 04019C 2282L, 6/16/2011. 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.</p>
<p><b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 &amp; § 58.5</b></p>		
<p><b>Air Quality</b> Clean Air Act, as amended, particularly section 176(c) &amp; (d); 40 CFR Parts 6, 51, 93</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The project's county or air quality management district is in non-attainment status for the following: Carbon monoxide, Particulate Matter, &lt;10 microns (Rillito, Pima County, AZ). 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 Arizona Department of Environmental Quality (ADEQ) and the Pima County Department of Environmental Quality (PDEQ) have reviewed air quality monitoring data and do not believe the development of single-family residences, multi-family housing, or small apartment complexes (under 100 units) in existing residential areas will adversely impact air quality. Memo from Richard Grimaldi, PDEQ, dated 12/18/2019. The project is in compliance with the Clean Air Act.</p>
<p><b>Coastal Zone Management Act</b> Coastal Zone Management Act, sections 307(c) &amp; (d)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project is located in a state that does not participate in the Coastal Zone Management Program. There are no coastal zones in Arizona. Therefore, this project is in compliance with the Coastal Zone Management Act.</p>
<p><b>Contamination and Toxic Substances</b> 24 CFR 50.3(i) &amp; 58.5(i)(2)]</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Site contamination was evaluated as follows: ASTM Phase I ESA, Western Technologies Inc, 3/10/2023 and 8/15/2023. No RECS, HRECs, or CRECs were identified in the 3/10/2023 Phase I ESA in connection with the subject</p>

	<p>property. No RECS or HRECs were identified in the 8/15/2023 Phase I ESA in connection with the subject property. A controlled recognized environmental condition (CREC) was identified in the 8/15/2023 Phase I ESA. The project site was depicted within the Per- and polyfluoroalkyl substances (PFAS) affected groundwater resulting from the Davis-Monthan Air Force Base (DMAFB) Superfund site. The Arizona Department of Environmental Quality (ADEQ), DMAFB, and City of Tucson-Tucson Water Department (Tucson Water, municipal potable water distributor) are currently working to address the PFAS affected groundwater within the vicinity of the project site. The project will be served by Tucson Water's municipal potable water distribution system that meets state and Federal water quality regulations. Tucson Water has established operating protocols for wells with detections of PFAS, based on the most current data available. Tucson Water has removed drinking water production wells from service due to PFAS found at levels higher than the Environmental Protection Agency's (EPA) health advisory level (HAL) in the regional groundwater aquifer near DMAFB. To address the PFAS threat to Tucson's drinking water supply, ADEQ has dedicated funds from its Water Quality Assurance Revolving Fund to delineate and capture PFAS-contaminated groundwater from impacting additional drinking water production wells and is working with Tucson Water and the Air Force Civil Engineering Center. ADEQ is keeping residents and businesses in the area of the field work informed and is coordinating closely with Tucson Water. Residents and businesses who receive their drinking water from Tucson Water</p>
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		<p>are continuing to receive drinking water that not only meets the EPA HAL for PFAS, but also meets Tucson Water's more conservative internal operating targets for PFAS. With mitigation, identified in the mitigation section of this review, the project will be in compliance with contamination and toxic substances requirements.</p>
<p><b>Endangered Species Act</b> Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>A formal species list was obtained through the USFWS IPaC system, 10/6/2023, and the following species were identified as potentially present in the analysis area: Ocelot (endangered), California Least Tern (endangered), Yellow-billed Cuckoo (threatened), Sonoyta Mud Turtle (endangered), Gila Chub (endangered), Monarch Butterfly (candidate), Arizona Eryngo (endangered), and Huachuca Water-umbel (endangered). No critical habitat was identified in the analysis area. No suitable habitat (riparian vegetation, rivers/streams, wetlands) are present in the analysis area for any of the listed species. Minimal vegetation is present on the project parcel. This project will not impact the landscaping of offsite private homes or commercial properties therefore no potential habitat for the monarch butterfly will be impacted. Multiple sensitive species and species protected under the Migratory Bird Treaty Act were identified with the potential to occur within the analysis area. The most likely habitat strata that would be used in the analysis area is the scattered landscaped vegetation, which can provide habitat for various state sensitive species and active nests protected under the Migratory Bird Treaty Act. It is unlikely that the project will encounter or impact protected active nests. General habitat quality in the analysis area is low and no other state sensitive species or protected</p>

		wildlife species would be expected to use the area. No other state sensitive species are likely to be present due to low habitat quality in the analysis area. This project will have No Effect on listed species due to the absence of federally listed species and designated critical habitat. This project is in compliance with the Endangered Species Act.
<b>Explosive and Flammable Hazards</b> 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. One AST containing diesel fuel was evaluated. The Separation Distance from the project is acceptable. The project is in compliance with explosive and flammable hazard requirements.
<b>Farmlands Protection</b> 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 includes activities that could potentially convert agricultural land to a non-agricultural use, but an exemption applies. The site does not meet the definition of farmland per 7 CFR Part 658.2(a), "...Farmland" does not include land already in or committed to urban development or water storage..." The site is in a fully-developed, urban environment per the US Census Urban Area Map printed 7/5/2022. The project is in compliance with the Farmland Protection Policy Act.
<b>Floodplain Management</b> 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. FEMA Zone X, 04019C 2282L, 6/16/2011. The project is in compliance with Executive Order 11988.
<b>Historic Preservation</b> 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 is covered by a Programmatic Agreement that includes an applicable exemption that exempts this project from the requirements of Section 106. A cultural resources survey was conducted by PaleoWest, LLC, 10/3/2023, in accordance with the Programmatic Agreement. The survey yielded no cultural resources, and the probability of subsurface deposits was



		<p>determined highly unlikely. No avoidance measures are recommended during ground disturbance activities. In the event previously unreported cultural resources are encountered during ground disturbing activities, all work must immediately cease within 30 meters (m; 100 ft) until a qualified archaeologist has documented the discovery and evaluated its eligibility for the Arizona Register of Historical Places or NRHP in consultation with the City of Tucson and the SHPO. Work must not resume in this area without approval of the City of Tucson. If human remains are encountered during ground disturbing activities, all work must immediately cease within 30 m (100 ft) of the encounter and the area must be secured. The ASM must be notified of the encounter. All encounters will be treated in accordance with Native American Graves Protection and Repatriation Act (Public Law 101-601; 25 USC 3001-3013) or Arizona Revised Statutes s.41-844 or s.41-865, as applicable, and work must not resume in this area without authorization from ASM. The project is in compliance with Section 106.</p>
<p><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</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>A Noise Assessment was conducted. The noise level was acceptable: 65.0 db. See noise analysis, Spendiarian &amp; Willis Acoustics &amp; Noise Control LLC, 9/6/2023. The project is in compliance with HUD's Noise regulation.</p>
<p><b>Sole Source Aquifers</b> Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The project is located on a sole source aquifer. The region has an MOU or other working agreement with EPA for HUD projects impacting a sole source aquifer, and the MOU or working agreement excludes the project from further review (Section II.B.1, "Construction of residential, commercial or industrial projects, or public facilities, or land developments, which will be</p>

		served by an existing and publicly owned and operated sewerage system and treatment plant which is not subject to a locally or EPA imposed moratorium, except for any development covered in A above."). The project will utilize existing municipal water and wastewater facilities. The project is in compliance with Sole Source Aquifer requirements.
<b>Wetlands Protection</b> Executive Order 11990, particularly sections 2 and 5	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project will not impact on- or off-site wetlands. The project is in compliance with Executive Order 11990.
<b>Wild and Scenic Rivers Act</b> Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is not within proximity of a NWSRS river. There are no NWSRS in Tucson. The project is in compliance with the Wild and Scenic Rivers Act.
<b>HUD HOUSING ENVIRONMENTAL STANDARDS</b>		
<b>ENVIRONMENTAL JUSTICE</b>		
<b>Environmental Justice</b> Executive Order 12898	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898.

**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.

Environment al Assessment Factor	Impac t Code	Impact Evaluation	Mitigatio n
<b>LAND DEVELOPMENT</b>			
Conformance with Plans / Compatible Land Use and	2	The project consists of acquisition and new construction of a 3-story, 72-unit affordable senior housing complex on a vacant parcel in Central Tucson that conforms within the surrounding	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Zoning / Scale and Urban Design		<p>neighborhoods in terms of overall scale, density, size, and massing. The acquisition and new construction activities will be permitted through the City of Tucson and Pima County. The site is consistent with local and regional planning efforts and has received planning and zoning verification from the City of Tucson. The project site is zoned R-1 on the northernmost portion of the parcel and C-2 on the rest of the site. The northernmost portion of the property will be left as open space with a walking path and a dog park. The project supports the goals of Plan Tucson, the City of Tucson General &amp; Sustainability Plan to provide housing, human services, public facilities, and economic development programs to address the housing needs of the most vulnerable populations.</p> <p><a href="http://www.tucsonaz.gov/Departments/PlanningDevelopment-Services/DevelopmentTools-Resources/Plans#section-1">www.tucsonaz.gov/Departments/PlanningDevelopment-Services/DevelopmentTools-Resources/Plans#section-1</a>. The project also supports the goals of the Tucson-Pima HUD 5 Year Consolidated Plan. Planning and Zoning verification by Nick Ross, PDS, 2/3/2023.</p>	
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2	<p>Geotechnical Engineering Report, Terracon, 8/9/2023, concluded the site appears suitable for the proposed construction based upon geotechnical conditions encountered in the test borings, provided that the geotechnical engineering recommendations provided in the report are implemented in the design and construction phases of this project.</p>	
Hazards and Nuisances including Site Safety and Site-Generated Noise	2	<p>A controlled recognized environmental condition (CREC) was identified in the Phase I ESA, Western Technologies, Inc., 8/15/2023. The project site was depicted within the Per- and polyfluoroalkyl substances (PFAS) affected groundwater resulting from the Davis-Monthan Air Force Base (DMAFB) Superfund site. The Arizona Department of Environmental Quality (ADEQ), DMAFB, and City of Tucson-Tucson Water Department (Tucson Water, municipal potable water distributor) are currently working to address the PFAS affected groundwater within the vicinity of the project site. No other</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		evidence of onsite hazards or nuisances including soil contamination; proximity to high pressure pipe lines or other volatile and explosive products; radio/TV transmission towers; excessive smoke, fumes, odors subsidence, ground water, inadequate surface drainage, flood, etc. Unisource owned transmission station north of the property and onsite telecommunications tower (which will remain onsite through a ground lease) were observed. There are no visible poisonous plants or animals on the site. No known natural hazards exist. The site has access to intersections with crosswalks for residents to cross nearby arterial streets, nearby street lighting, sidewalks, bike lanes and other safety features. Other than a brief period of construction there should be no increase in noise levels.	
<b>SOCIOECONOMIC</b>			
Employment and Income Patterns	2	The City of Tucson anticipates sustaining jobs in the environmental, engineering, and construction industries as part of this project. Employment opportunities will be created for construction trades as part of this project. The project consists of acquisition and new construction of affordable senior housing. The site is within walking distance or a short commute on public transit to numerous retail, restaurant, and service businesses.	
Demographic Character Changes / Displacement	2	The project site is in an area of low income, a mix of low- to medium-density residential (R-1 and R-2), low-intensity and general community uses that serve the community and region (C-1 and C-2), mid-rise, office, medical, civic, and select other uses (O-3), the area has a 66.21% minority population, and approximately 48% of housing units being renter-occupied. The project consists of acquisition and redevelopment on a currently vacant/undeveloped lot with newly constructed affordable senior housing.	
Environmental Justice EA Factor	2	The project site is in an area of low income, a mix of low- to medium-density residential (R-1 and R-2), low-intensity and general community uses that serve the community and region (C-1 and C-2), mid-rise,	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>office, medical, civic, and select other uses (O-3), the area has a 66.21% minority population, and approximately 48% of housing units being renter-occupied. Elevated EJ Indexes are observed within one mile of the site related to the nearby traffic corridor, lead paint (pre-1960 housing), commercial hazardous waste generators, RMP Facilities, UST sites, wastewater dischargers, and State Superfund proximity (DMAFB Superfund site). The project site was depicted within the Per- and polyfluoroalkyl substances (PFAS) affected groundwater resulting from the Davis-Monthan Air Force Base (DMAFB) Superfund site. The Arizona Department of Environmental Quality (ADEQ), DMAFB, and City of Tucson-Tucson Water Department (Tucson Water) are currently working to address the PFAS affected groundwater within the vicinity of the project site. The project will be served by Tucson Water's municipal potable water distribution system that meets state and Federal water regulations. The project consists of acquisition and redevelopment of a currently vacant/undeveloped lot with newly constructed affordable senior housing. The project supports the City of Tucson-Pima County HOME Consortium HOME-ARP Allocation Plan activities, which include non-congregate shelter acquisition and rehabilitation, provision of some supportive services, rental housing construction, acquisition and/or rehabilitation, and nonprofit capacity building assistance. The project will directly benefit underserved, low-income populations. The project will have minimal impact to neighboring residents/occupants while providing much needed affordable housing.</p>	
<b>COMMUNITY FACILITIES AND SERVICES</b>			
Educational and Cultural Facilities (Access and Capacity)	2	<p>The project consists of acquisition and redevelopment of a currently vacant/undeveloped lot with newly constructed affordable senior housing. Little to no impact is anticipated to area primary, middle, and high schools, daycares, and pre-schools. Educational and cultural enrichment</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		opportunities are available at nearby community centers, libraries, recreation centers, and parks. Multi-modal access to educational and cultural facilities is readily available and is not anticipated to be impacted by foreseeable climate changes.	
Commercial Facilities (Access and Proximity)	2	The project consists of acquisition and redevelopment of a currently vacant/undeveloped lot with newly constructed affordable senior housing. The project will not adversely impact or displace commercial facilities. The project site is within 2 miles of major grocery stores, pharmacies, retail and service businesses, medical providers, and thrift stores. Multi-modal access to these facilities is readily available.	
Health Care / Social Services (Access and Capacity)	2	The project site is within five miles of major medical centers and emergency rooms. Numerous emergency facilities, clinics, and physician services are within an easy commute on public transit. Nearby support services include HOPE Inc., Sonora Behavioral Health, Avant Recovery, and Evolve, LLC. Support services will also be available to for qualifying residents through a third-party.	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	2	Onsite waste disposal and recycling services will be available through the City of Tucson Environmental & General Services Department. The City of Tucson provides extensive recycling options, including construction debris handling and recycling, landfill disposal, green waste recycling, and household hazardous waste disposal services. Construction debris generated during demolition will be routed to a nearby east Tucson Landfill or to a regional landfill depending on the category of waste material.	
Waste Water and Sanitary Sewers (Feasibility and Capacity)	2	The project consists of acquisition and redevelopment of a currently vacant/undeveloped lot with newly constructed affordable senior housing. Pima County Wastewater will provide wastewater and sewer service to the project site. Wastewater and sewer service is not anticipated to be impacted by foreseeable climate changes. Sewerage capacity letter from Pima County Wastewater Reclamation, 2/23/2022.	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Water Supply (Feasibility and Capacity)	2	The project consists of acquisition and redevelopment of a currently vacant/undeveloped lot with newly constructed affordable senior housing. Tucson Water will provide water service to the project. Will Serve letter signed by Michael Mourreale, Tucson Water, 3/14/2023.	
Public Safety - Police, Fire and Emergency Medical	2	The project site is less than 1.5 miles from Tucson Fire Station 11. The site is within one mile of Tucson Police Department (Hardesty Midtown Multi-Service Center). Response times vary depending on the type of call, but the average time for emergency response is five minutes or less. The project sites are within five miles of major medical centers with emergency medical care, including Tucson Medical Center and urgent care facilities.	
Parks, Open Space and Recreation (Access and Capacity)	2	The project includes construction of an affordable senior housing complete with a dog park, a walking path, and supportive services for qualifying populations. The site is within 1.7 miles of eight parks and three recreation centers. The Randolph and Freedom Park recreation centers provide senior programs, services, and activities. The Freedom Park Center also provides a senior meal program.	
Transportation and Accessibility (Access and Capacity)	2	The project is located within 0.70 miles of three arterial roads with excellent bus access, crosswalks, sidewalks, and bicycle lanes. Tucson's regional transit system including Sun Tran, Sun Express, and Sun Van provide service to 22nd St, Alvernon Rd, and Swan Rd (nearby arterials). Two bus lines travel north/south along Alvernon and Swan Roads, and one bus line travels east/west along 22nd Street and bus stops are within walking distance of the site. Onsite parking will be available.	
<b>NATURAL FEATURES</b>			
Unique Natural Features /Water Resources	2	There are no unique natural or water features on or nearby the site.	
Vegetation / Wildlife (Introduction,	2	The site is currently vacant/undeveloped with minimal vegetation. There are no visible signs of wildlife at this property.	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Modification, Removal, Disruption, etc.)			
Other Factors 1			
Other Factors 2			
<b>CLIMATE AND ENERGY</b>			
Climate Change	2	The project consists of acquisition and redevelopment of the currently vacant/undeveloped lot with newly constructed supportive affordable housing. The project will be built to National Green Building Standards Silver, or better. Climate predictions forecast increased average daily temperatures and decreased annual precipitation for the area.	
Energy Efficiency	2	The project consists of acquisition and redevelopment of the currently vacant/undeveloped lot with newly constructed supportive affordable housing. Increase in energy consumption by new construction of 72 units of housing. The project will be built to National Green Building Standards Silver, or better. Minimal water use anticipated for dust control during construction.	

**Supporting documentation**

- [2023-10-18 Google Maps Urgent Care.pdf](#)
- [2023-10-18 Google Maps Thrift Store.pdf](#)
- [2023-10-18 Google Maps Police.pdf](#)
- [2023-10-18 Google Maps Pharmacy.pdf](#)
- [2023-10-18 Google Maps Parks.pdf](#)
- [2023-10-18 Google Maps Library.pdf](#)
- [2023-10-18 Google Maps Hospital Medical.pdf](#)
- [2023-10-18 Google Maps Grocery.pdf](#)
- [2023-10-18 Google Maps Fire.pdf](#)
- [2023-10-18 Google Maps Discount Store.pdf](#)
- [2023-10-18 Google Maps Comm Center.pdf](#)
- [2023-10-12 22nd FFIEC.pdf](#)
- [2023-8-2 22nd Zoning Map.pdf](#)



[2023-8-2 22nd Transit Map.pdf](#)  
[2023-3-21 PC Av Total Precipitation.pdf](#)  
[2023-3-21 PC Av Daily Max Temp.pdf](#)  
[2023-2-3 Belvedere Zoning Cert Signed.pdf](#)

**Additional Studies Performed:**

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

by:

Kenna Karjala

8/10/2023 12:00:00 AM

[Belvedere Terrace - Arch Line Drawings.pdf](#)  
[2023-8-15 22nd Ph I ESA Site Recon Photos.pdf](#)  
[2022-2-25 22nd Ph I ESA Site Recon Photos.pdf](#)

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

City of Tucson, Office of the Mayor-Mayor Regina Romero; City of Tucson, Housing and Community Development Department-Ann Chanecka, Mary Leon, Ben Carpenter; City of Tucson Planning and Development Services; City of Tucson, Department of Transportation and Mobility; Tucson Fire Department; Tucson Police Department; City of Tucson, Tucson Water Department; City of Tucson, Environmental & General Services Department; Pima County Wastewater Management; City of Tucson-Pima County Consortium Consolidated Plan ([www.tucsonaz.gov/files/sharedassets/public/v/1/living-and-working/housing-community-development/documents/cot\\_-\\_pima\\_county\\_consortium\\_2020-2024\\_hud\\_consolidated\\_plan\\_and\\_ffy2020\\_annual\\_action\\_plans.pdf](http://www.tucsonaz.gov/files/sharedassets/public/v/1/living-and-working/housing-community-development/documents/cot_-_pima_county_consortium_2020-2024_hud_consolidated_plan_and_ffy2020_annual_action_plans.pdf)); City of Tucson, Plan Tucson ([www.tucsonaz.gov/Departments/Planning-Development-Services/Development-Tools-Resources/Plans#section-1](http://www.tucsonaz.gov/Departments/Planning-Development-Services/Development-Tools-Resources/Plans#section-1))

**List of Permits Obtained:**

The reviews that go into each project include but are not limited to: Planning, Zoning, Engineering, Landscape, Fire, ADA, Plumbing, Solid Waste, Right of Way Improvements, Structural, Mechanical and Plumbing, Electrical, Fire, Zoning Engineering, Wastewater, Water, Transportation. The City of Tucson Planning and Development Services Department reviews, approves and issues all permits for: zoning, site plans, grading, storm water, demolition, parking, landscape and construction trades; issues all permits; performs inspections and issues certificate of occupancy. The Department enforces building and zoning codes.

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

Publication of a combined Notice of Intent to Request Release of Funds/Finding of No Significant Impacts (RROF/FONSI) in the Arizona Daily Star 10/19/2023. Interested parties contacted by e-mail. The Environmental Review Record (ERR) that documents the environmental determinations for this project is available at [www.tucsonaz.gov/Departments/Housing-andCommunityDevelopment/Documents/Environmental-Review](http://www.tucsonaz.gov/Departments/Housing-andCommunityDevelopment/Documents/Environmental-Review) and in-person at 310 North Commerce Park Loop, Tucson, Arizona 85745. The ERR will also be available and distributed on the HUD HEROS system.

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

The proposed acquisition and redevelopment of the currently vacant/undeveloped lot with newly constructed supportive affordable housing is located in central Tucson, in an area of low income, a mix of low- to medium-density residential (R-1 and R-2), low-intensity and general community uses that serve the community and region (C-1 and C-2), mid-rise, office, medical, civic, and select other uses (O-3). The project will be a minor contributor to the increase in population, traffic, and energy usage already anticipated in the area. The project will redevelop a site in an urban neighborhood that will use existing roadways, sewer systems, municipal water, and other utilities. No significant cumulative impacts on the environment are anticipated from the Proposed Action in conjunction with other activities.

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

No alternatives other than the No Action Alternative were considered.

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

Acquisition and new construction of supportive senior, affordable housing would not occur. Goals of the City of Tucson Consolidated Plan and Plan Tucson would not be fulfilled. Improvement of the currently vacant/undeveloped lot with newly constructed supportive affordable housing would not occur.

**Summary of Findings and Conclusions:**

The proposed property acquisition and new construction of a 3-story, 72-unit affordable senior housing complex in in the Toumey Park Neighborhood Association in central Tucson will not adversely affect the environment or the neighborhood. The activity is compatible with existing mix of urban, low- to medium-density residential, low-intensity and general community uses that serve the community and region, mid-rise, office, medical, civic, and select other uses. There will be little to no impact on existing resources or services in the area. The project is a positive step in meeting City of Tucson goals for encouraging appropriate growth and development in the area. The

project is a positive step in meeting City of Tucson goals for addressing the housing shortage and housing affordability needs in the community.

**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.

<b>Law, Authority, or Factor</b>	<b>Mitigation Measure or Condition</b>	<b>Comments on Completed Measures</b>	<b>Mitigation Plan</b>	<b>Complete</b>
Contamination and Toxic Substances	A controlled recognized environmental condition (CREC) was identified in the Phase I Environmental Site Assessment conducted by Western Technologies Inc. dated 8/15/2023. The project site was depicted within the Per- and polyfluoroalkyl substances (PFAS) affected groundwater resulting from the Davis-Monthan Air Force Base (DMAFB) Superfund site. The Arizona Department of Environmental Quality (ADEQ), DMAFB, and City of Tucson-Tucson Water Department (Tucson Water) are currently working to address the PFAS affected groundwater within the vicinity of the project site. Western Technologies made no recommendation for further assessment of the property at this time. The project will be served by Tucson Water's municipal potable water distribution system that meets state and Federal water quality regulations. Tucson Water has	N/A	The project will be served by Tucson Water's municipal potable water distribution system that meets state and Federal water quality regulations.	

	established operating protocols for wells with detections of PFAS, based on the most current data available.			
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**Project Mitigation Plan**

The project will be served by Tucson Water's municipal potable water distribution system that meets state and Federal water quality regulations.

**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

Yes

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

Yes, project is in an APZ

Yes, project is an RPZ/CZ

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

Based on the response, the review is in compliance with this section. Document and upload the map showing that the site is not within either zone below.

### Screen Summary

#### Compliance Determination

The project is within 15,000 feet of a military airport or within 2,500 of a civilian airport. However, it is not within an APZ or RPZ/CZ. The project is in compliance with Airport Hazards requirements.

#### Supporting documentation

HOME-Belvedere-Terrace-  
Apts-LIHTC

Tucson, AZ

900000010357701

[2023-8-2 22nd Airport Map.pdf](#)

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

Yes

No

### Coastal Barrier Resources

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

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

#### Compliance Determination

This project is located in a state that does not contain CBRS units. There are no CBRS units in Arizona. Therefore, this project is in compliance with the Coastal Barrier Resources Act.

#### Supporting documentation

[Coastal Barriers Template 2022-9-14.pdf](#)

**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:**

[2023-8-2 22nd Flood Map.pdf](#)

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

**4. While flood insurance is not mandatory for this project, HUD strongly recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). Will flood insurance be required as a mitigation measure or condition?**



Yes

✓ No

**Screen Summary**

**Compliance Determination**

The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area. FEMA Zone X, 04019C 2282L, 6/16/2011. 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
The Clean Air Act is administered by the U.S. Environmental Protection Agency (EPA), which sets national standards on ambient pollutants. In addition, the Clean Air Act is administered by States, which must develop State Implementation Plans (SIPs) to regulate their state air quality. Projects funded by HUD must demonstrate that they conform to the appropriate SIP.	Clean Air Act (42 USC 7401 et seq.) as amended particularly Section 176(c) and (d) (42 USC 7506(c) and (d))	40 CFR Parts 6, 51 and 93

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

Yes

No

### 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:**  
Pima County Department of Environmental Quality (PDEQ)

**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 (Rillito, Pima County, AZ). 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 Arizona Department of Environmental Quality (ADEQ) and the Pima County Department of Environmental Quality (PDEQ) have reviewed air quality monitoring data and do not believe the development of single-family residences, multi-family housing, or small apartment complexes (under 100 units) in existing residential areas will adversely impact air quality. Memo from Richard Grimaldi, PDEQ, dated 12/18/2019. The project is in compliance with the Clean Air Act.

**Supporting documentation**

[Air quality memo 12-18-19.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. There are no coastal zones in Arizona. Therefore, this project is in compliance with the Coastal Zone Management Act.

##### **Supporting documentation**

[Coastal zones template 11-1-19.pdf](#)

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

Yes

✓ No

### Contamination and Toxic Substances

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

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

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

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

No

- Yes

**3. Mitigation**

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

**Can adverse environmental impacts be mitigated?**

Adverse environmental impacts cannot feasibly be mitigated.

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

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

A controlled recognized environmental condition (CREC) was identified in the Phase I Environmental Site Assessment conducted by Western Technologies Inc. dated 8/15/2023. The project site was depicted within the Per- and polyfluoroalkyl substances (PFAS) affected groundwater resulting from the Davis-Monthan Air Force Base (DMAFB) Superfund site. The Arizona Department of Environmental Quality (ADEQ), DMAFB, and City of Tucson-Tucson Water Department (Tucson Water) are currently working to address the PFAS affected groundwater within the vicinity of the project site. Western Technologies made no recommendation for further assessment of the property at this time. The project will be served by Tucson Water's municipal potable water distribution system that meets state and Federal water quality regulations. Tucson Water has established operating protocols for wells with detections of PFAS, based on the most current data available.

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

Complete removal

Risk-based corrective action (RBCA)

**Screen Summary**

**Compliance Determination**

Site contamination was evaluated as follows: ASTM Phase I ESA, Western Technologies Inc, 3/10/2023 and 8/15/2023. No RECS, HRECs, or CRECs were identified in the 3/10/2023 Phase I ESA in connection with the subject property. No RECS or HRECs were identified in the 8/15/2023 Phase I ESA in connection with the subject property. A controlled recognized environmental condition (CREC) was identified in the 8/15/2023 Phase I ESA. The project site was depicted within the Per- and polyfluoroalkyl

substances (PFAS) affected groundwater resulting from the Davis-Monthan Air Force Base (DMAFB) Superfund site. The Arizona Department of Environmental Quality (ADEQ), DMAFB, and City of Tucson-Tucson Water Department (Tucson Water, municipal potable water distributor) are currently working to address the PFAS affected groundwater within the vicinity of the project site. The project will be served by Tucson Water's municipal potable water distribution system that meets state and Federal water quality regulations. Tucson Water has established operating protocols for wells with detections of PFAS, based on the most current data available. Tucson Water has removed drinking water production wells from service due to PFAS found at levels higher than the Environmental Protection Agency's (EPA) health advisory level (HAL) in the regional groundwater aquifer near DMAFB. To address the PFAS threat to Tucson's drinking water supply, ADEQ has dedicated funds from its Water Quality Assurance Revolving Fund to delineate and capture PFAS-contaminated groundwater from impacting additional drinking water production wells and is working with Tucson Water and the Air Force Civil Engineering Center. ADEQ is keeping residents and businesses in the area of the field work informed and is coordinating closely with Tucson Water. Residents and businesses who receive their drinking water from Tucson Water are continuing to receive drinking water that not only meets the EPA HAL for PFAS, but also meets Tucson Water's more conservative internal operating targets for PFAS. With mitigation, identified in the mitigation section of this review, the project will be in compliance with contamination and toxic substances requirements.

**Supporting documentation**

[2023-10-12 COT TW PFAS.pdf](#)

[2023-10-12 ADEQ PFAS.pdf](#)

[2023-8-15 Belvedere Ph I ESA WTI Optimized.pdf](#)

[2022-3-10 Belvedere Ph I ESA WTI.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**

A formal species list was obtained through the USFWS IPaC system, 10/6/2023, and the following species were identified as potentially present in the analysis area: Ocelot (endangered), California Least Tern (endangered), Yellow-billed Cuckoo (threatened), Sonoyta Mud Turtle (endangered), Gila Chub (endangered), Monarch Butterfly (candidate), Arizona Eryngo (endangered), and Huachuca Water-umbel (endangered). No critical habitat was identified in the analysis area. No suitable habitat (riparian vegetation, rivers/streams, wetlands) are present in the analysis area for any of the listed species. Minimal vegetation is present on the project parcel. This project will not impact the landscaping of offsite private homes or commercial properties therefore no potential habitat for the monarch butterfly will be impacted. Multiple sensitive species and species protected under the Migratory Bird Treaty Act were identified with the potential to occur within the analysis area. The most likely habitat strata that would be used in the analysis area is the scattered landscaped vegetation, which can provide habitat for various state sensitive species and active nests protected under the Migratory Bird Treaty Act. It is unlikely that the project will encounter or impact protected active nests. General habitat quality in the analysis area is low and no other state sensitive species or protected wildlife species would be expected to use the area. No other state sensitive species are likely to be present due to low habitat quality in the analysis area. This project will have No Effect on listed species due to the absence of federally listed species and designated critical habitat. This project is in compliance with the Endangered Species Act.

#### **Supporting documentation**

[2023-10-6 22nd IPaC TE List.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 itself the development of a hazardous facility (a facility that mainly stores, handles or processes flammable or combustible chemicals such as bulk fuel storage facilities and refineries)?**

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 that are covered by 24 CFR 51C? Containers that are NOT covered under the regulation include:**

- Containers 100 gallons or less in capacity, containing common liquid industrial fuels OR

- Containers of liquified petroleum gas (LPG) or propane with a water volume capacity of 1,000 gallons or less that meet the requirements of the 2017 or later version of National Fire Protection Association (NFPA) Code 58.

If all containers within the search area fit the above criteria, answer "No." For any other type of aboveground storage container within the search area that holds one of the flammable or explosive materials listed in Appendix I of 24 CFR part 51 subpart C, answer "Yes."

No

Yes

4. Based on the analysis, is the proposed HUD-assisted project located at or beyond the required separation distance from all covered tanks?

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. One AST containing diesel fuel was evaluated. The Separation Distance from the project is acceptable. The project is in compliance with explosive and flammable hazard requirements.

##### **Supporting documentation**

[2023-10-18 22nd AST Summary.pdf](#)

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

Yes

No

## Farmlands Protection

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

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

Yes

No

**2. Does your project meet one of the following exemptions?**

- Construction limited to on-farm structures needed for farm operations.
- Construction limited to new minor secondary (accessory) structures such as a garage or storage shed
- Project on land already in or committed to urban development or used for water storage. (7 CFR 658.2(a))

Yes

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

No

### **Screen Summary**

#### **Compliance Determination**

This project includes activities that could potentially convert agricultural land to a non-agricultural use, but an exemption applies. The site does not meet the definition of farmland per 7 CFR Part 658.2(a), "...Farmland" does not include land already in or committed to urban development or water storage..." The site is in a fully-developed, urban environment per the US Census Urban Area Map printed 7/5/2022. The project is in compliance with the Farmland Protection Policy Act.

#### **Supporting documentation**

[US Census Urban Area Map 2022-7-5.pdf](#)

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

Yes

No

## Floodplain Management

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

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

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

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

[2023-8-2 22nd Flood Map.pdf](#)

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

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

- No

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

Yes

**Screen Summary**

**Compliance Determination**

This project does not occur in a floodplain. FEMA Zone X, 04019C 2282L, 6/16/2011.  
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" <a href="https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol3/pdf/CFR-2012-title36-vol3-part800.pdf">https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol3/pdf/CFR-2012-title36-vol3-part800.pdf</a>

#### **Threshold**

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

- ✓ No, because the project consists solely of activities listed as exempt in a Programmatic Agreement (PA ). (See the PA Database to find applicable PAs.)
- No, because the project consists solely of activities included in a No Potential to Cause Effects memo or other determination [36 CFR 800.3(a)(1)].
- Yes, because the project includes activities with potential to cause effects (direct or indirect).

**Threshold (a). Either upload the PA below or provide a link to it here:**

**Upload exemption(s) below or copy and paste all applicable text here:**

Properties located outside existing or potential historic districts which are less than 45 years old and those located in areas designated as non-historic will not need to be reviewed for National Register eligibility. When proposed work takes place on vacant property a minimum of an archaeological records check and survey shall be performed. Should significant, eligible resources be encountered, then appropriate preservation or mitigation measure shall be employed. If no properties are present, this may be noted in project files and the work may proceed as planned.

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

**Screen Summary**

**Compliance Determination**

Based on the project description the project is covered by a Programmatic Agreement that includes an applicable exemption that exempts this project from the requirements of Section 106. A cultural resources survey was conducted by PaleoWest, LLC, 10/3/2023, in accordance with the Programmatic Agreement. The survey yielded no cultural resources, and the probability of subsurface deposits was determined highly unlikely. No avoidance measures are recommended during ground disturbance activities. In the event previously unreported cultural resources are encountered during ground disturbing activities, all work must immediately cease within 30 meters (m; 100 ft) until a qualified archaeologist has documented the discovery and evaluated its eligibility for the Arizona Register of Historical Places or NRHP in consultation with the City of Tucson and the SHPO. Work must not resume in this area without approval of the City of Tucson. If human remains are encountered during ground disturbing activities, all work must immediately cease within 30 m (100 ft) of the encounter and the area must be secured. The ASM must be notified of the encounter. All encounters will be treated in accordance with Native American Graves Protection and Repatriation Act (Public Law 101-601; 25 USC 3001-3013) or Arizona Revised Statutes s.41-844 or s.41-865, as applicable, and work must not resume in this area without authorization from ASM. The project is in compliance with Section 106.

**Supporting documentation**

[2023-8-2 22nd HPO Map.pdf](#)

[2023-10-3 Belvedere CRS Paleowest.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))

Indicate noise level here: 65

Based on the response, the review is in compliance with this section. Document and upload noise analysis, including noise level and data used to complete the analysis below.

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))

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: 65

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

**Screen Summary**

**Compliance Determination**

A Noise Assessment was conducted. The noise level was acceptable: 65.0 db. See noise analysis, Spendiarian & Willis Acoustics & Noise Control LLC, 9/6/2023. The project is in compliance with HUD's Noise regulation.

**Supporting documentation**

[2023-9-6 Belvedere Noise Study Spendarian Willis.pdf](#)

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

Yes

No

### Sole Source Aquifers

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

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

Yes

✓ No

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

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

No

✓ 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

Document and upload where your project fits within the MOU or working agreement below. Based on the response, the review is in compliance with this section.

No

#### **Screen Summary**

##### **Compliance Determination**

The project is located on a sole source aquifer. The region has an MOU or other working agreement with EPA for HUD projects impacting a sole source aquifer, and the MOU or working agreement excludes the project from further review (Section II.B.1, "Construction of residential, commercial or industrial projects, or public facilities, or land developments, which will be served by an existing and publicly owned and operated sewerage system and treatment plant which is not subject to a locally or EPA imposed moratorium, except for any development covered in A above."). The project will utilize existing municipal water and wastewater facilities. The project is in compliance with Sole Source Aquifer requirements.

##### **Supporting documentation**

[Sole Source Aquifer Template 5-11-18.pdf](#)

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

Yes

No

### Wetlands Protection

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

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

No

✓ Yes

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

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

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

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

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

### Screen Summary



**Compliance Determination**

The project will not impact on- or off-site wetlands. The project is in compliance with Executive Order 11990.

**Supporting documentation**

[2023-8-2 22nd Wetlands 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. There are no NWSRS in Tucson. The project is in compliance with the Wild and Scenic Rivers Act.

**Supporting documentation**

[NRI Wild-Scenic Rivers 2023-10-9.pdf](#)

[NWSRS Wild-Scenic Rivers 2022-7-7.pdf](#)

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

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. The project is in compliance with Executive Order 12898.

##### **Supporting documentation**

[2023-10-12 22nd EJScreen.pdf](#)

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

Yes

No



### Notes

Aerial Map

### Legend

 Parcels

**Project Area**

1: 9,028



1,457.6      0      728.82      1,457.6 Feet

WGS\_1984\_Web\_Mercator\_Auxiliary\_Sphere

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This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.

**THIS MAP IS NOT TO BE USED FOR NAVIGATION**

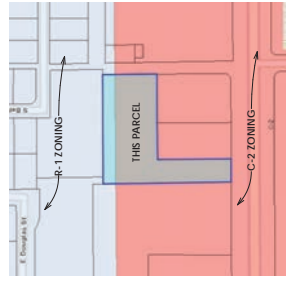
**ZONING:** THIS PORTION OF PARCEL IS C-2 NORTH PORTION IS R-1  
 ALL UNITS PER ACRE ALLOWABLE  
 PARCEL IS 1.08 ACRES (66,726 SF)  
 1.82 ACRES IS IN ZONING 3.76 ACRES (16,400 SF)  
 89 MAX UNITS ALLOWABLE

**SETBACKS REQUIRED BETWEEN NON-RESIDENTIAL USE AND NON-RESIDENTIAL ZONE**  
 1-10' HEIGHT SETBACK REQUIRED BETWEEN NON-RESIDENTIAL USE AND RESIDENTIAL ZONE  
 20' SETBACK @ 1:12 H/V IS 4-7' 6" SETBACK AT NORTH SIDE OF PARCEL

**RESOURCES PROVIDED PER DWELLING UNIT:**  
 72 sq. ft. of PARKING SPACE  
 34 sq. ft. of STORAGE SPACE  
**TOTAL SPACES PROVIDED: 61**

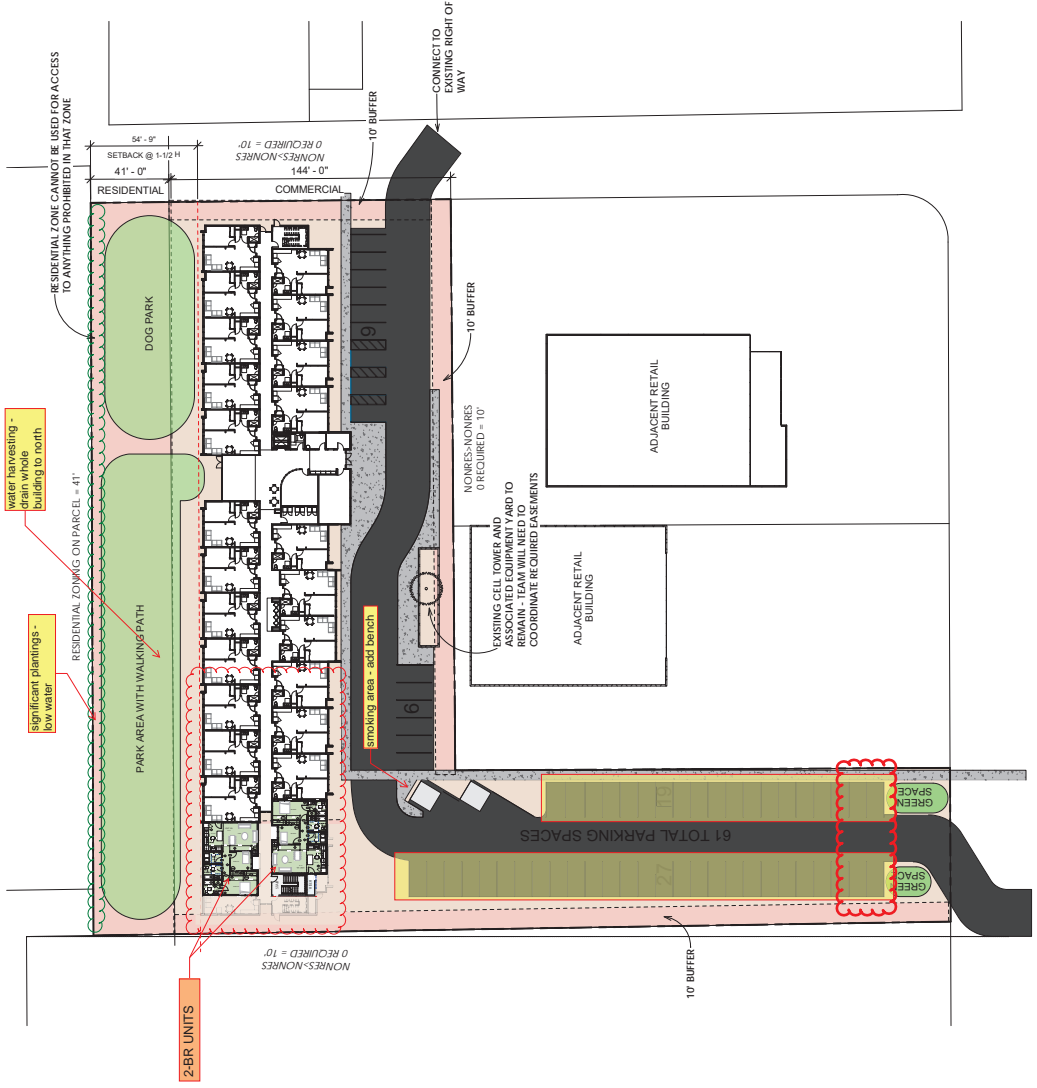
**UNIT COUNT:**  
 ONE BR TWO BR  
 LEVEL 1 22 2  
 LEVEL 2 22 2  
**TOTAL 66**  
**GRAND TOTAL 72 DWELLING UNITS**  
**BASELINE BUILDING IS 10' TOTAL ADDITIONAL**

**DIMENSIONAL REQUIREMENTS:**  
 40' MAX WIND SPEED  
 10' MIN. OVERHANG  
 70% MAX LOT COVERAGE



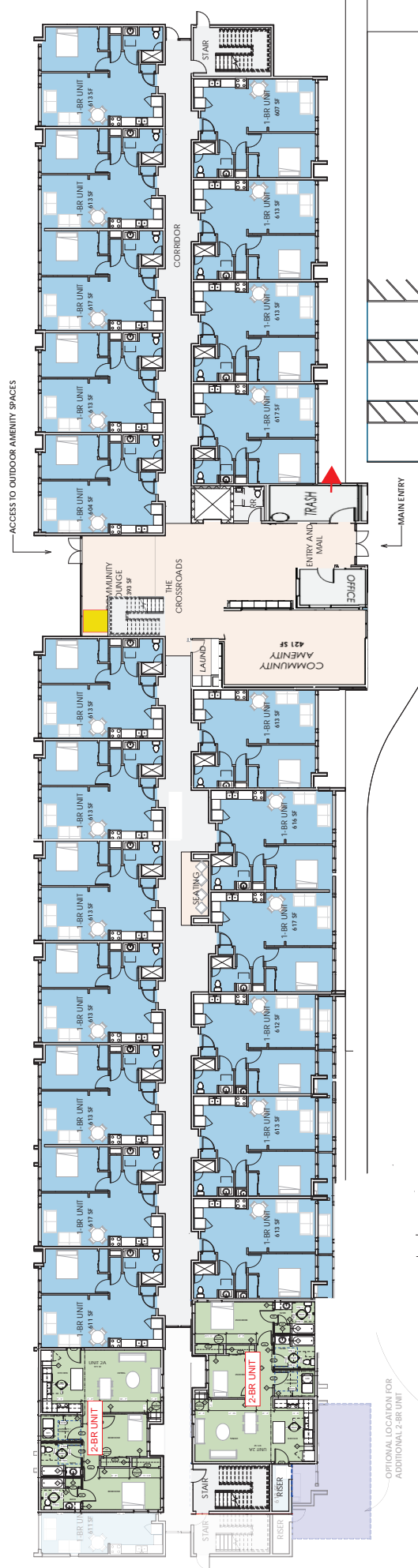
**TABLE A-3-4.4. DIMENSIONAL STANDARDS FOR THE C-2, C-3, C-4, C-5, C-6 & C-7 ZONES**  
 Note: All setbacks shall be taken from the exterior wall of the building. See Section 3.3.2, Determining Setbacks, for further details.

Requirement Number	Zone	C-2	C-3	C-4	C-5	C-6	C-7
Maximum Building Height	40' MAX WIND SPEED	40'	40'	40'	40'	40'	40'
Maximum Lot Coverage	70% MAX LOT COVERAGE	70%	70%	70%	70%	70%	70%
Minimum Setback	10' MIN OVERHANG	10'	10'	10'	10'	10'	10'
Minimum Setback	40' MAX WIND SPEED	10'	10'	10'	10'	10'	10'
Minimum Setback	40' MAX WIND SPEED	10'	10'	10'	10'	10'	10'
Minimum Setback	40' MAX WIND SPEED	10'	10'	10'	10'	10'	10'
Minimum Setback	40' MAX WIND SPEED	10'	10'	10'	10'	10'	10'



22ND STREET

PRESENTATION SITE PLAN  
 1" = 30'-0"



- UNIT COUNT - FIRST FLOOR**
- 1-BEDROOM: 22 UNITS
  - 2-BEDROOM: 2 UNITS
  - TOTAL: 24 UNITS**
- COLOR LEGEND**
- 1-BR DWELLING UNITS
  - CIRCULATION
  - PUBLIC AND AMENITY

OPTIONAL LOCATION FOR  
ADDITIONAL 2-BR UNIT

# FIRST FLOOR PLAN



**UNIT COUNT - FIRST FLOOR**

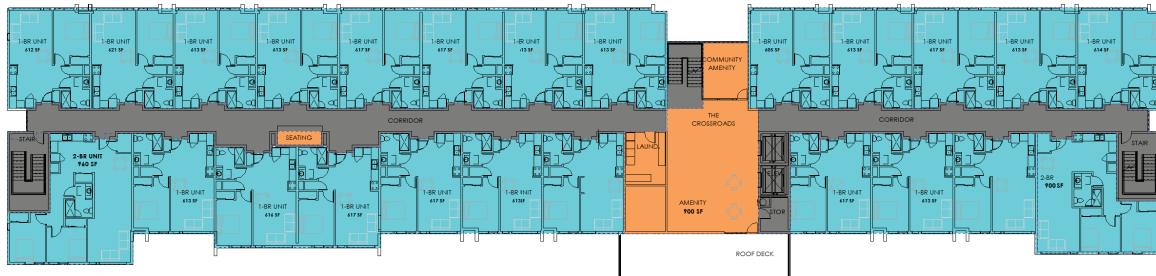
1-BEDROOM: (22) UNITS  
2-BEDROOM: (2) UNITS

**(24) UNITS TOTAL**

**COLOR LEGEND**

- 1-BR DWELLING UNITS
- 2-BR DWELLING
- CIRCULATION
- PUBLIC AND AMENITY

residential: 16,500  
circulation: 3,600  
amenity: 2,060



**UNIT COUNT - SECOND FLOOR**

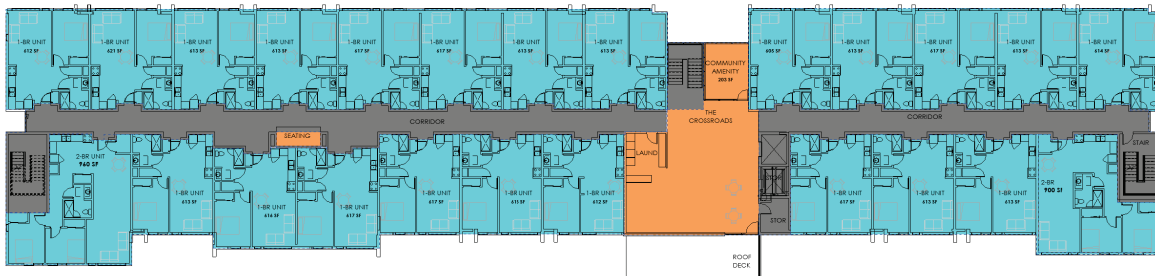
1-BEDROOM: (22) UNITS  
2-BEDROOM: (2) UNITS

**(24) UNITS TOTAL**

**COLOR LEGEND**

- 1-BR DWELLING UNITS
- 2-BR DWELLING
- CIRCULATION
- PUBLIC AND AMENITY

residential: 16,500  
circulation: 3,555  
amenity: 1,590



**UNIT COUNT - THIRD FLOOR**

1-BEDROOM: (22) UNITS  
2-BEDROOM: (2) UNIT

**(24) UNITS TOTAL**

**COLOR LEGEND**

- 1-BR DWELLING UNITS
- 2-BR DWELLING
- CIRCULATION
- PUBLIC AND AMENITY

residential: 16,500  
circulation: 3,555  
amenity: 1,590

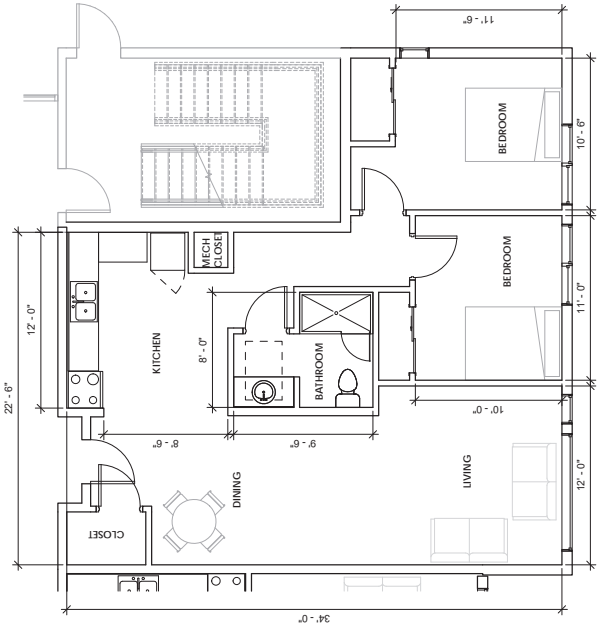
**BUILDING SQUARE FOOTAGES**

RESIDENTIAL: 49,500

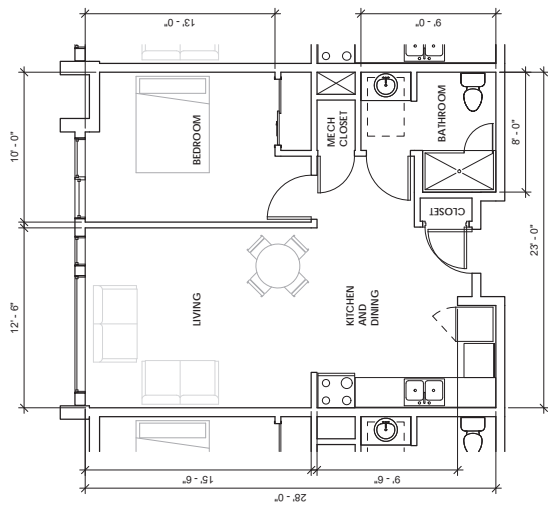
CIRCULATION: 10,710

AMENITY: 5,240

GRAND TOTAL: 65,450



② TYPICAL TWO-BEDROOM UNIT  
1/4" = 1'-0"

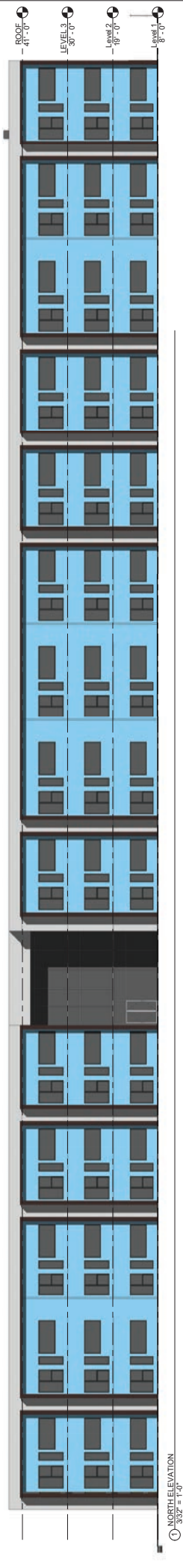


① TYPICAL ONE-BEDROOM UNIT  
1/4" = 1'-0"

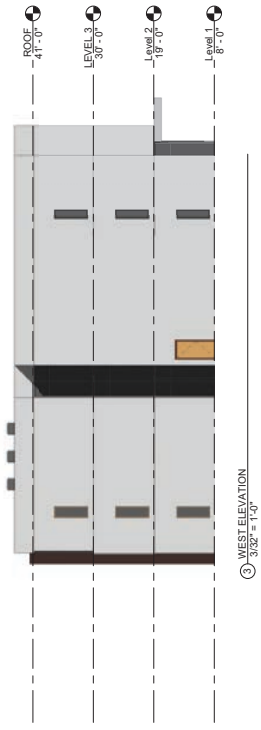




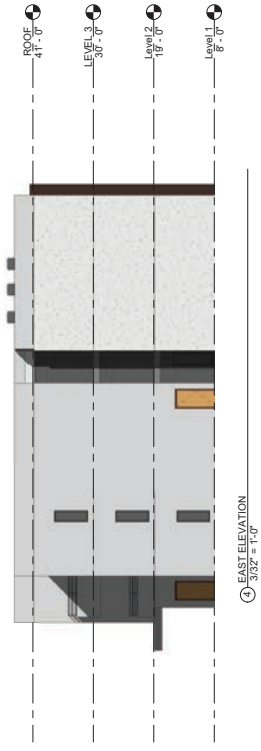
2 SOUTH ELEVATION  
3/32" = 1'-0"



1 NORTH ELEVATION  
3/32" = 1'-0"



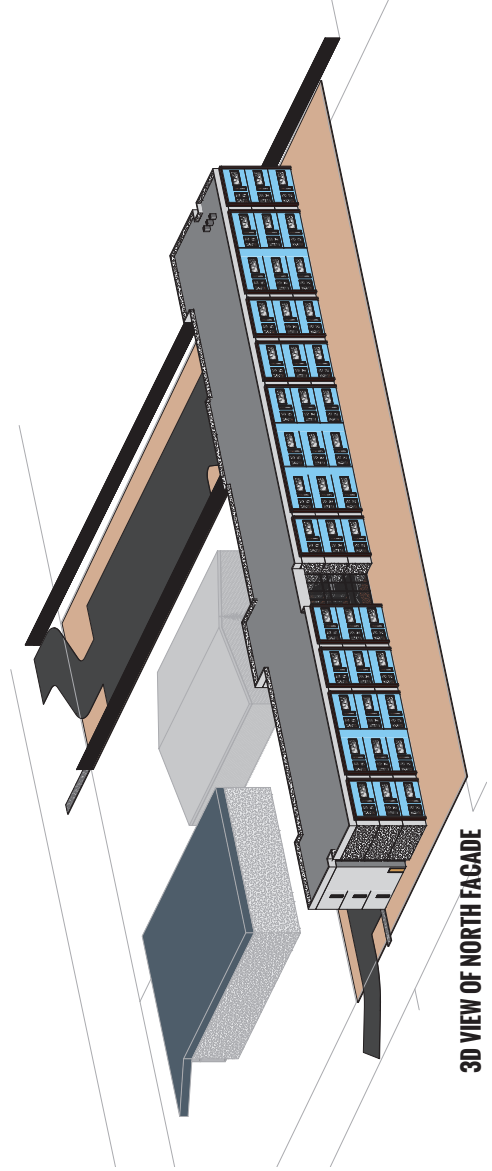
1 WEST ELEVATION  
3/32" = 1'-0"



1 EAST ELEVATION  
3/32" = 1'-0"



3D VIEW OF SOUTH FACADE



3D VIEW OF NORTH FACADE



Notes

Airport Map

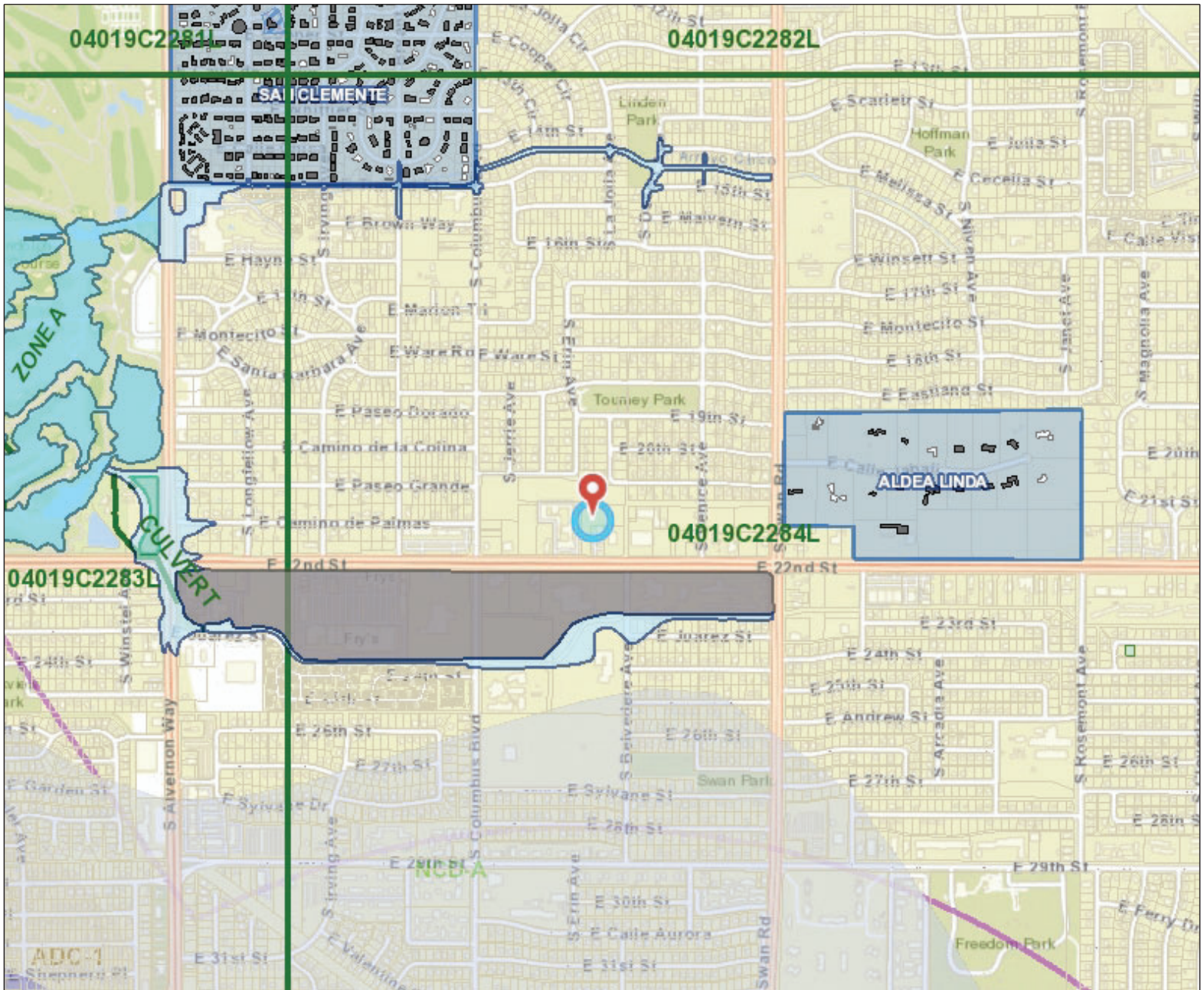
Legend

- Parcels
- + Railroads
- AEZ Noise
  - 65-70 LDN
  - 70-75 LDN
  - 70-PLUS LDN
  - 75-80 LDN
  - 80-PLUS LDN
- ◻ Aviation Easement & Disclosure Areas
- DM AFB Approach-Departure Corridors
- ADC-1
- ADC-2
- ADC-3
- DM AFB Noise Control Districts
- NCD-A
- NCD-B
- ◻ Airport Hazard Districts
- ◻ Historic Landmark Zones
- ◻ Historic Preservation Zones
- World Street Map

1: 144,448



23,322.3 0 11,661.14 23,322.3 Feet



Notes

Flood Map

Legend

- |  |   |  |   |   |
|--|---|--|---|---|
| <ul style="list-style-type: none"> <li> Land Fills - City/County</li> <li> Land Fills - State/Federal</li> <li> Leaking Underground Storage Tanks - COT Owned</li> <li><b>A Zones</b></li> <li> ZONE A</li> <li> ZONE AE</li> <li> ZONE AH</li> <li> ZONE AO</li> <li><b>X Zones</b></li> <li> Zone X</li> </ul> | <ul style="list-style-type: none"> <li> LOMR</li> <li> Excluded Structures/Parcels</li> <li> Other</li> <li> Floodway</li> <li> 1% Chance Flood Contained in Culvert/Channel</li> <li><b>FIRM</b></li> <li> Historic Properties</li> <li> Listed</li> <li> Listed and Local</li> <li> Contributor</li> <li> Eligible</li> </ul> | <ul style="list-style-type: none"> <li> Ineligible</li> <li> Non-Contributor</li> <li> No Data</li> <li> Demolished Contributor</li> <li> Demolished</li> <li> Demolished</li> <li> Vacant</li> <li> Outside of HD</li> <li> City of Tucson Historic Zoning</li> <li> City of Tucson National Register Districts</li> <li> Current National</li> </ul> | <ul style="list-style-type: none"> <li> Eligible National</li> <li> Archaeological Sensitivity Zones</li> <li> Parcels</li> <li> Railroads</li> <li><b>AEZ Noise</b></li> <li> 65-70 LDN</li> <li> 70-75 LDN</li> <li> 70-PLUS LDN</li> <li> 75-80 LDN</li> <li> 80-PLUS LDN</li> <li> Avigation Easement &amp; Disclosure Areas</li> </ul> | <ul style="list-style-type: none"> <li><b>DM AFB Approach-Departur Corridors</b></li> <li> ADC-1</li> <li> ADC-2</li> <li> ADC-3</li> <li><b>DM AFB Noise Control Districts</b></li> <li> NCD-A</li> <li> NCD-B</li> <li> Airport Hazard Districts</li> <li> Historic Landmark Zones</li> </ul> |
|--|---|--|---|---|

1: 18,056



2,915.3 0 1,457.64 2,915.3 Feet

WGS\_1984\_Web\_Mercator\_Auxiliary\_Sphere

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THIS MAP IS NOT TO BE USED FOR NAVIGATION



# PHASE I ENVIRONMENTAL SITE ASSESSMENT

**APPROXIMATELY 95,752 SQUARE FEET OF VACANT LAND**

4431 East 22nd Street  
Tucson, Arizona 85711  
WT Job No. 2982XC036

**PREPARED FOR:**

Newport SW LLC  
9 Cushing Street, Suite 200  
Irvine, California 92618

Attn: Mr. David R. Wohl

March 10, 2022

Amie Town  
Environmental Scientist

Karl D. Peterson, R.G.  
Environmental Project Manager





**Western  
Technologies Inc.**  
The Quality People  
Since 1955

3480 South Dodge Boulevard  
Tucson, Arizona 85713-5435  
(520) 748-2262 • fax 748-0435

March 10, 2022

Newport SW LLC  
9 Cushing Street, Suite 200  
Irvine, California 92618

Attn: Mr. David R. Wohl

Re: Phase I Environmental Site Assessment  
Approximately 95,752 Square Feet of Vacant Land  
4431 East 22nd Street  
Tucson, Arizona 85711

WT Job No. 2982XC036

Western Technologies Inc. presents this Phase I Environmental Site Assessment of the vacant land at 4431 East 22nd Street in Tucson, Arizona. The results of our assessment, significant findings and conclusions are presented in the enclosed report.

This report completes the agreed scope of services. Thank you for allowing us to provide these services.

Please let us know, if we can be of further assistance with the property redevelopment. We offer asbestos, lead-based paint, and indoor air quality services; geotechnical engineering, construction materials testing & engineering, and other services.

Sincerely,  
**WESTERN TECHNOLOGIES INC.**



Karl D. Peterson, R.G.  
Environmental Project Manager

Copies to: Addressee (1)

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## EXECUTIVE SUMMARY

Western Technologies Inc. (WT) completed a Phase I Environmental Site Assessment (ESA) of the vacant land at 4431 East 22nd Street, Tucson, Arizona (“the Property”). The purpose of this ESA was to identify to the extent feasible, pursuant to the processes described herein, Recognized Environmental Conditions (RECs), in connection with the Property.

The Property was approximately 2.05 acres of vacant land. According to the Pima County online assessor records, the parcel number for the Property was 126-19-1910.

Based on a review of available historical information, the Property has been vacant land since at least 1941. Adjoining sites were developed by 1958.

### Findings

- Current Use of the Property – The Property was vacant land at the time of the site reconnaissance. No RECs were identified in connection with the current use of the Property.
- Use of Adjoining Properties – The adjoining properties consisted of commercial development. No RECs were identified in connection with the use of adjoining properties.
- Historical Use of the Property – The Property has been vacant land since at least 1941. The historical use of the Property did not represent a REC.
- Regulatory Agency Records Review – The Property was not listed in the regulatory databases. The facilities listed in the regulatory databases did not represent a REC to the Property based on current regulatory status and/or distance.
- No CRECs were identified in connection with the Property.
- No HRECs were identified in connection with the Property.
- No indications of vapor migration on the Property were identified.
- One unplotable record “that could not be mapped due to various reasons,” was reported in the database. As the unplotable record cannot be feasibly retrieved, according to ASTM E1527-13, this record is not “practically reviewable.”

WT has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E1527-13 of the vacant land at 4431 East 22nd Street, Tucson, Arizona. Any exceptions to, or deletions from, this practice are described in Section 8 of this report.

This ESA has revealed no evidence of RECs currently in connection with the Property, and WT makes no recommendations for further assessment at this time.

If additional information becomes available or known that may suggest the presence of RECs currently in connection with the Property, contact this firm for potential recommendations.



**Photo 1**  
**Comments:** View of the Property, looking north



**Photo 2**  
**Comments:** View of discarded furniture, northern portion of the Property



**Photo 3**  
**Comments:** View of eastern portion of Property



**Photo 4**  
**Comments:** View of telecommunication tower on the Property



**Photo 5**  
**Comments:** View of north-adjointing property



**Photo 6**  
**Comments:** View of East 22nd Street, followed by south-adjointing property



**Photo 7**  
**Comments:** View of east-adjointing property



**Photo 8**  
**Comments:** View of west-adjointing property

## PHASE I ENVIRONMENTAL SITE ASSESSMENT

### VACANT LAND

4431 East 22<sup>nd</sup> Street  
Tucson, Arizona  
WT Job No. 29-823517-0


### PREPARED FOR:

Newport SW LLC  
9 Cushing Street, Suite 200  
Irving, California 92618


Attn: David Wohl

### ASTM DATES:

Reconnaissance: August 10, 2023  
Records Review: August 9, 2023  
Interviews: August 9, 2023  
Lien Search: August 15, 2023  
Report Issuance: August 15, 2023  
ASTM Viability: February 9, 2023



for  
Kage Anderson  
Environmental Scientist



Todd Sayers  
Vice-President

GEOTECHNICAL

ENVIRONMENTAL

INSPECTIONS

NDT

MATERIALS

3480 South Dodge Boulevard, Tucson, Arizona, 85713 (520) 748-2262

[wt-us.com](http://wt-us.com)



**Western Technologies**  
An **RMA** Company

• 3480 South Dodge Boulevard • Tucson, Arizona 85713 • [www.wt-us.com](http://www.wt-us.com)

August 15, 2023

Newport SW LLC  
9 Cushing Street, Suite 200  
Irving, California 92618

Attn: David Wohl

Re: Phase I Environmental Site Assessment  
Vacant Land  
4431 East 22<sup>nd</sup> Street  
Tucson, Arizona

WT Job No. 29-823517-0

The enclosed report summarizes the significant findings about Recognized Environmental Conditions in connection with the Subject Property referenced above. The presumed viability of the enclosed report, pursuant to ASTM E1527-21, Section 4.6.1, is February 9, 2023. This report completes the agreed scope of services. If you have any questions or if we may be of further assistance to you, please do not hesitate to contact us. Thank you for allowing us to provide these services.

Sincerely,

**WESTERN TECHNOLOGIES**

Todd Sayers  
Vice-President

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## EXECUTIVE SUMMARY

Western Technologies (WT) completed a Phase I Environmental Site Assessment (ESA) of the vacant land at 3341 East 22<sup>nd</sup> Street, Tucson, Arizona (the "Subject Property"). The purpose of this ESA was to identify to the extent feasible pursuant to the processes described herein, *Recognized Environmental Conditions* (RECs) and *Controlled RECs* (CRECs), and to evaluate other environmental conditions for consideration as *Historical RECs* (HRECs), *Vapor Encroachment Conditions* (VEC) and *de minimis conditions* in connection with the Subject Property.

The Subject Property was approximately 2.05 acres of land. The current use of the Subject Property was a cell tower. WT did not identify indications of RECs in connection with the current use and occupancy of the Subject Property.

The Subject Property was within a commercial and residential portion of Tucson, Arizona. The north adjoining sites were single-family residences, the south adjoining site was an AutoZone and a Family Dollar Store, the west adjoining site was apartments, and the east adjoining store was an auto sales store. WT did not identify indications of RECs in connection with the Subject Property attributable to the current uses and occupancies of the adjoining sites.

The Subject Property was historically vacant land. The surrounding sites were used as commercial and residential starting in 1948. The east adjoining site was listed as an auto repair shop from 1999 to 2020. This site was not listed within the Federal USEPA or State ADEQ databases. The site was also not listed with ASTs. WT did not identify indications of RECs in connection with the historical uses of the Subject Property.

WT obtained and reviewed a commercially available report of standard lists and databases kept by the United States Environmental Protection Agency (USEPA) and State Arizona Department of Environmental Quality (ADEQ). The database also listed seven leaking underground storage tanks (LUST), one Resource Conservation and Recovery Act very small quantity generator (RCRA VSQG), and one Department of Defense (DOD) superfund site within the approximate search distances. The Davis Monthan Airforce Base (DMAFB), approximately 0.17 miles south, was listed as a superfund site. The site was identified with per- and polyfluoroalkyl (PFA) concentrations exceeding 70 nanograms per liter present in the groundwater. Tucson water supply wells north of DMAFB have been impacted with per- and polyfluoroalkyl substances (PFAS). WT interviewed Mr. Jerry Helton, with ADEQ, and Mr. Helton indicated that the Central Tucson PFAS Project was conducting a study to delineate the PFAS plume extent from the DMAFB. A Site Characterization Report depicted the PFAS & PFOS released by DMAFB was within the regional aquifer, which extended approximately two miles downgradient from the base. The Subject Property was depicted within the affected groundwater that exceeded 18 nanograms per liter and within 1/8 mile of the plume that exceeded the PFAS 70 ppt screening level. Based on the Subject Property being depicted within the PFAS plume released by DMAFB, this site does represent a CREC.

WT considered the potential for a VEC to exist at the Subject Property by comparing the relative locations of the facilities identified in the regulatory agency database report to the Subject Property using the geographical and hydrogeological gradients described in the physical setting data. Based



on the regulatory classifications, and a separation distance exceeding the 100-foot critical distance, a VEC likely does not exist at the Subject Property due to these listings.

WT has performed this ESA in general agreement with the scope and limitations of ASTM E 1527-21 of school campus at 1300 South Belvedere Avenue, Tucson, Arizona. This assessment has revealed the following RECs, CRECs, or significant data gaps in connection with the Subject Property:

The following CREC was identified from the ESA: the Subject Property was depicted within the area of the PFAS affected groundwater that resulted from the DMAFB. ADEQ, DMAFB, and Tucson Water are currently working to address the PFAS plume. WT makes no recommendation for further assessment at this time.

If additional information becomes available or known that may suggest the presence of RECs currently in connection with the Subject Property, contact this firm for potential recommendations.

Newport SW LLC  
Commercial Property Phase I ESA  
4431 East 22<sup>nd</sup> Street  
Tucson, Arizona  
**Photographic Log**  
**WESTERN TECHNOLOGIES**

WT Job No.: 29-823517-0

Date: August 15, 2023



Picture 1 – View of the Subject Property, looking north



Picture 2 – View of the Subject Property, looking northeast



Picture 3 – View of cell tower on the Subject Property



Picture 4 – View of the Subject Property, looking west



Picture 5 – View of northern portion of the Subject Property, looking east



Picture 6 – View of north-adjacent site

Client  
Commercial Property Phase I ESA  
Address  
City, State  
**Photographic Log**  
**WESTERN TECHNOLOGIES**

WT Job No.: 29-823517-0

Date: August 15, 2023



Picture 7 – View of south adjoining Family Dollar



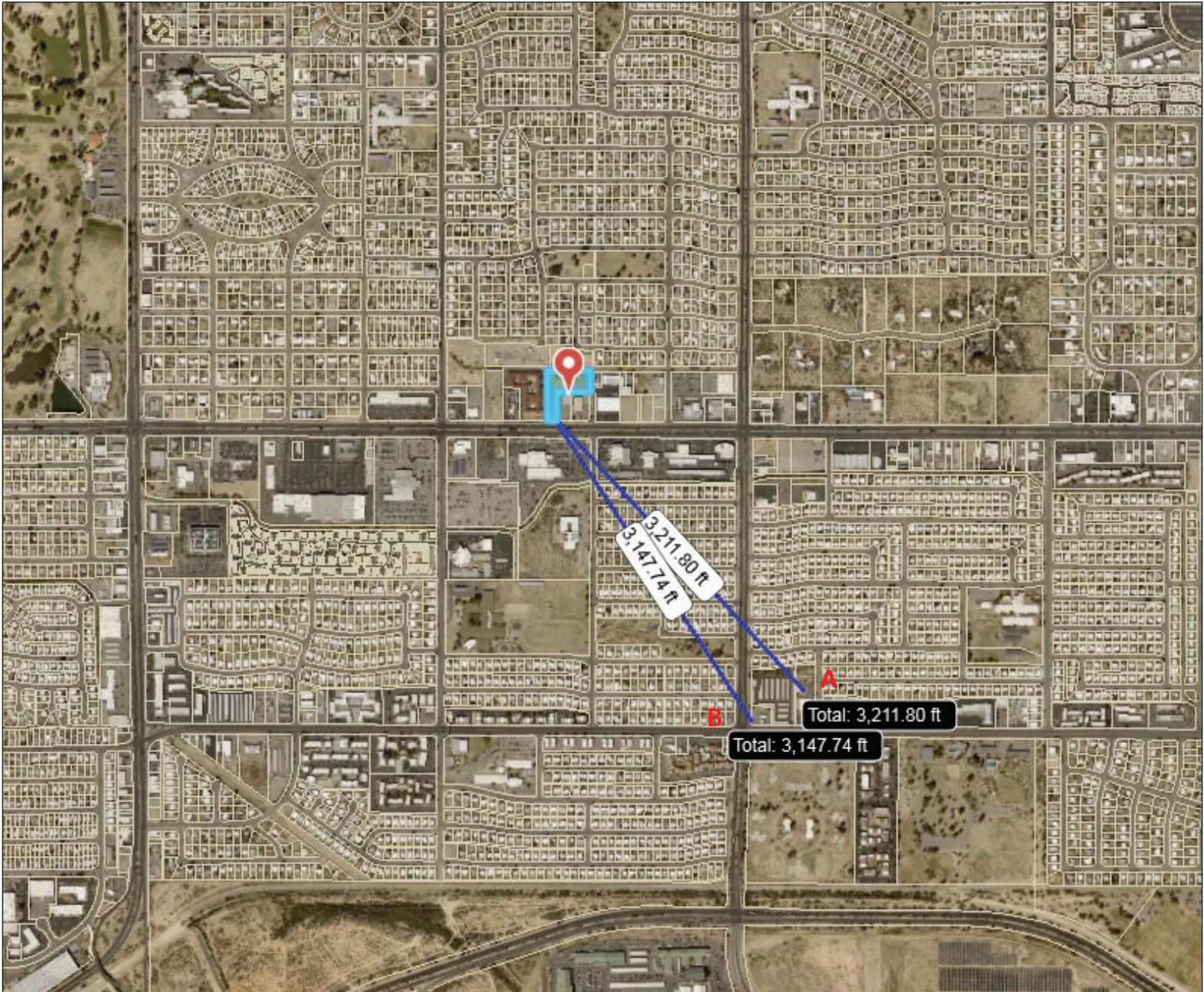
Picture 8 – View of east adjoining site



Picture 9 – View of west-adjointing site

AST	Location	Container	ASDPPU (ft)	ASDBPU (ft)	Measured Distance (ft)
A	4777 E 29 <sup>th</sup> St	750 gallons, diesel, liquid, undiked	245.33	44.02	3,211.80
B*	4701 E 29 <sup>th</sup> St	600 gallons (water volume capacity), propane	n/a	n/a	3,147.74

\*Note – AST B contain less than 1,000 gallons (water volume capacity) of propane and meets the requirements of the 2017 version of National Fire Protection Association (NFPA) Code 58



Notes

ASD Map

Legend

Parcels

1: 18,056



2,915.3 0 1,457.64 2,915.3 Feet

WGS\_1984\_Web\_Mercator\_Auxiliary\_Sphere

© City of Tucson

This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.

THIS MAP IS NOT TO BE USED FOR NAVIGATION

[Home \(/\)](#) > [Programs \(/programs/\)](#) > [Environmental Review \(/programs/environmental-review/\)](#) > ASD Calculator

## Acceptable Separation Distance (ASD) Electronic Assessment Tool

The Environmental Planning Division (EPD) has developed an electronic-based assessment tool that calculates the Acceptable Separation Distance (ASD) from stationary hazards. The ASD is the distance from above ground stationary containerized hazards of an explosive or fire prone nature, to where a HUD assisted project can be located. The ASD is consistent with the Department's standards of blast overpressure (0.5 psi-buildings) and thermal radiation (450 BTU/ft<sup>2</sup> - hr - people and 10,000 BTU/ft<sup>2</sup> - hr - buildings). Calculation of the ASD is the first step to assess site suitability for proposed HUD-assisted projects near stationary hazards. Additional guidance on ASDs is available in the Department's guidebook "Siting of HUD-Assisted Projects Near Hazardous Facilities" and the regulation 24 CFR Part 51, Subpart C, Siting of HUD-Assisted Projects Near Hazardous Operations Handling Conventional Fuels or Chemicals of an Explosive or Flammable Nature.

**Note:** Tool tips, containing field specific information, have been added in this tool and may be accessed by hovering over the ASD result fields with the mouse.

### Acceptable Separation Distance Assessment Tool

Is the container above ground?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Is the container under pressure?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Does the container hold a cryogenic liquified gas?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
Is the container diked?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
What is the volume (gal) of the container?	<input type="text" value="750"/>
What is the Diked Area Length (ft)?	<input type="text"/>
What is the Diked Area Width (ft)?	<input type="text"/>
<input type="button" value="Calculate Acceptable Separation Distance"/>	
Diked Area (sqft)	<input type="text"/>
ASD for Blast Over Pressure (ASDBOP)	<input type="text"/>
ASD for Thermal Radiation for People (ASDPPU)	<input type="text" value="245.33"/>
ASD for Thermal Radiation for Buildings (ASDBPU)	<input type="text" value="44.02"/>
ASD for Thermal Radiation for People (ASDPNPD)	<input type="text"/>
ASD for Thermal Radiation for Buildings (ASDBNPD)	<input type="text"/>

**For mitigation options, please click on the following link:** [Mitigation Options \(/resource/3846/acceptable-separation-distance-asd-hazard-mitigation-options/\)](#)

### Providing Feedback & Corrections

After using the ASD Assessment Tool following the directions in this User Guide, users are encouraged to provide feedback on how the ASD Assessment Tool may be improved. Users are also encouraged to send comments or corrections for the improvement of the tool.

Please send comments or other input using the [Contact Us \(https://www.hudexchange.info/contact-us/\)](#) form.

### Related Information

- [ASD User Guide \(/resource/3839/acceptable-separation-distance-asd-assessment-tool-user-guide/\)](#)
- [ASD Flow Chart \(/resource/3840/acceptable-separation-distance-asd-flowchart/\)](#)

### Re: Assistance with AST Review for HUD Project

Nicholas Janton <Nicholas.Janton@tucsonaz.gov>

Thu 4/13/2023 1:20 PM

To: Rolanda Mazeika <Rolanda.Mazeika@tucsonaz.gov>

📎 1 attachments (20 KB)

NFPA standards SOG 07.01.18.pdf;

Good afternoon,

TFD adopted the 2018 International Fire Code (IFC) in July of 2018 and the NFPA standards referenced within. This includes the 2017 NFPA 58. However TFD has a written policy to reference the most recent and up to date NFPA standards despite the year listed in the IFC. The current version that we reference for LPG tanks is 2020.

2018 IFC	July 1, 2018	Ordinance #11556
----------	--------------	------------------

All permitted ASTs for LPG are inspected and maintain compliance with NFPA 58 2020 edition for the Tucson Fire Department.

Thank you

Can you provide a location for the undetermined tank?

I am happy to look into it and determine size and contents. Most likely if on a generator it will only be a couple hundred gallons and is typically diesel fuel.

Nicholas Janton CFM  
 Captain  
 Special Hazards Unit  
 Tucson Fire Prevention  
 520-837-7117 (o)  
 520-419-4676 (c)





## 1.0 Objectives

This guideline addresses the use of NFPA standards. The fire code official is authorized to adopt polices to clarify the application of the International Fire Code per section 104.1.

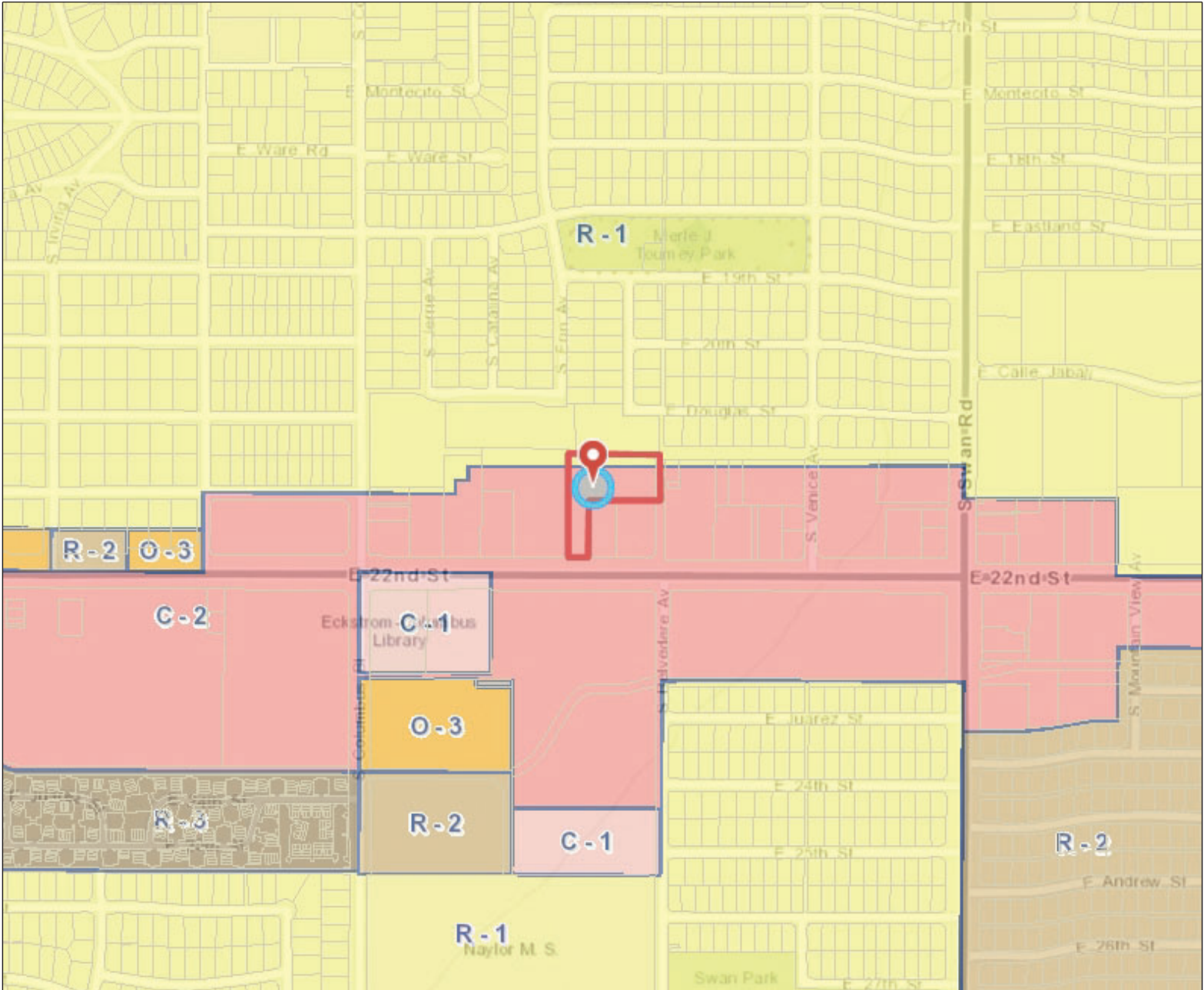
## 2.0 Policy

The NFPA standards that are referenced in the International Fire Code have an effective date and title listed. This policy allows the Fire Prevention Section to use the latest published edition of the NFPA standard in lieu of the edition listed in the International Fire Code.

## 3.0 Procedures

The Fire Prevention Section may utilize the current published NFPA standards during inspections and plan reviews. The Fire Prevention Section may allow any plan submittal to utilize the current published edition of NFPA standards or the referenced edition listed in the International Fire Code. Mixing of the edition years is not allowed.



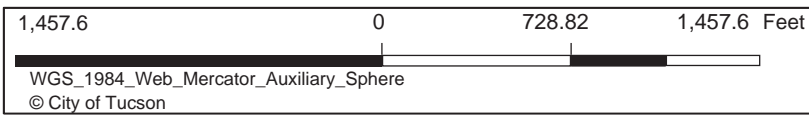


**Notes**  
Zoning Map

**Legend**

<input type="checkbox"/> Parcels	NR-2	HC-2	HO-3	I-1
<b>Tucson Zoning</b>	R-3	C-3	P	I-2
<all other values>	HR-3	HC-3	HP	OCR-1
PADs	NR-3	HLC-3	RX-1	OCR-2
R-1	UR-3	UC-3	HLRX-1	HOCR-2
HLR-1	C-1	HNC	HRX-1	MU
HR-1	HC-1	O-1	RX-2	RH
NR-1	HLC-1	HO-1	HRX-2	SH
R-2	UC-1	O-2	SR	RV
HLR-2	UHC-1	HO-2	HSR	MH-1
HR-2	C-2	O-3	P-I	MH-2

1: 9,028



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# EJScreen Community Report

This report provides environmental and socioeconomic information for user-defined areas, and combines that data into environmental justice and supplemental indexes.

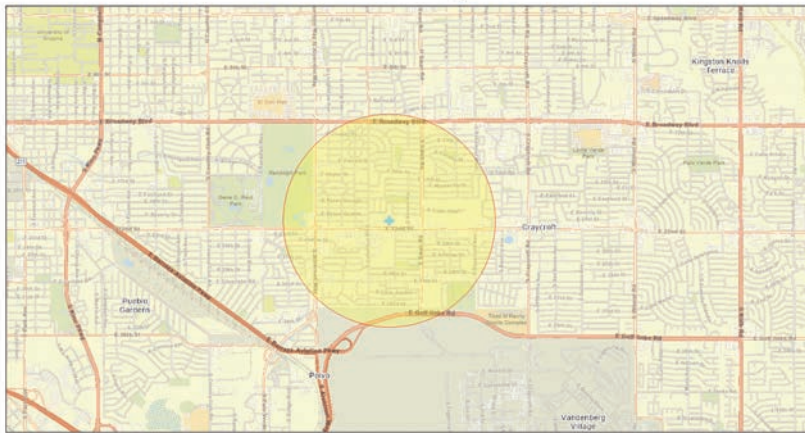
## Tucson, AZ

1 mile Ring Centered at 32.208022,-110.897568

Population: 15,064

Area in square miles: 3.14

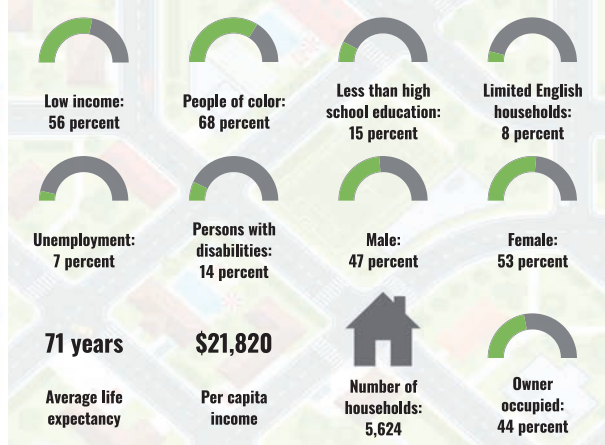
A3 Landscape



October 12, 2023  
4431 E 22nd St, Tucson, AZ 85711

1:26,112  
0 0.5 1 1.5 mi  
0 0.5 1 2 km  
©2023 Esri, HERE, DeLorme, Paragon, Pointstar, Swire, Unacademy, VLS, WGS, Swire, Land Management, EPA, NOAA, US Census Bureau, NOAA

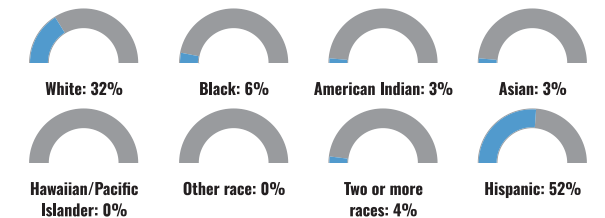
### COMMUNITY INFORMATION



### LANGUAGES SPOKEN AT HOME

LANGUAGE	PERCENT
English	69%
Spanish	25%
Other Indo-European	1%
Vietnamese	1%
Tagalog (including Filipino)	1%
Other Asian and Pacific Island	1%
Other and Unspecified	2%
Total Non-English	31%

### BREAKDOWN BY RACE



### BREAKDOWN BY AGE



### LIMITED ENGLISH SPEAKING BREAKDOWN



Notes: Numbers may not sum to totals due to rounding. Hispanic population can be of any race. Source: U.S. Census Bureau, American Community Survey (ACS) 2017-2021. Life expectancy data comes from the Centers for Disease Control.

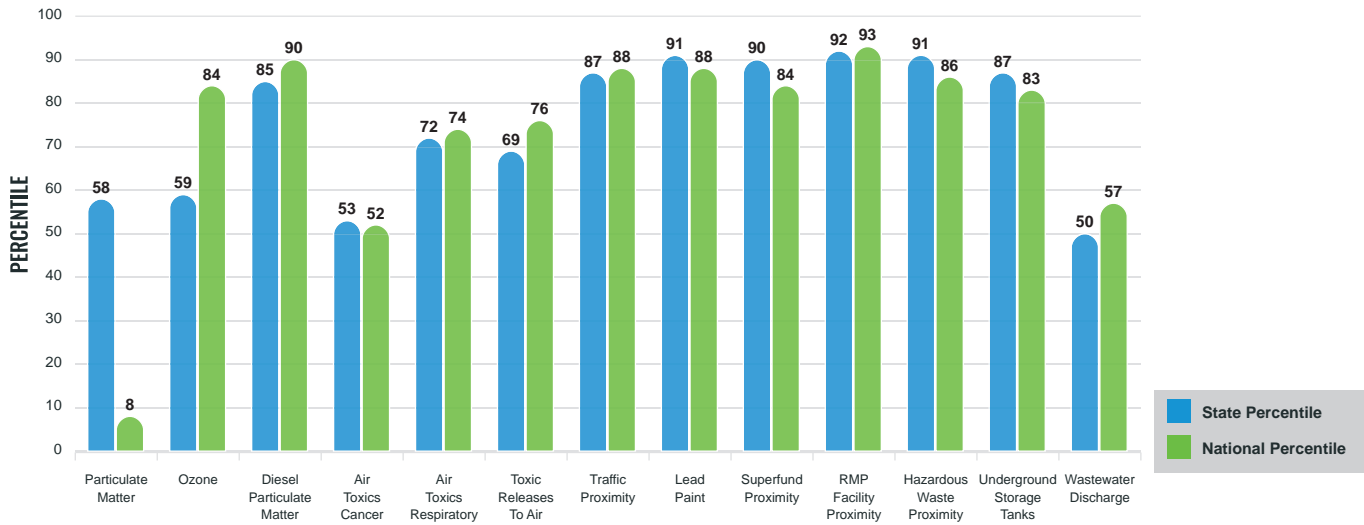
# Environmental Justice & Supplemental Indexes

The environmental justice and supplemental indexes are a combination of environmental and socioeconomic information. There are thirteen EJ indexes and supplemental indexes in EJScreen reflecting the 13 environmental indicators. The indexes for a selected area are compared to those for all other locations in the state or nation. For more information and calculation details on the EJ and supplemental indexes, please visit the [EJScreen website](#).

## EJ INDEXES

The EJ indexes help users screen for potential EJ concerns. To do this, the EJ index combines data on low income and people of color populations with a single environmental indicator.

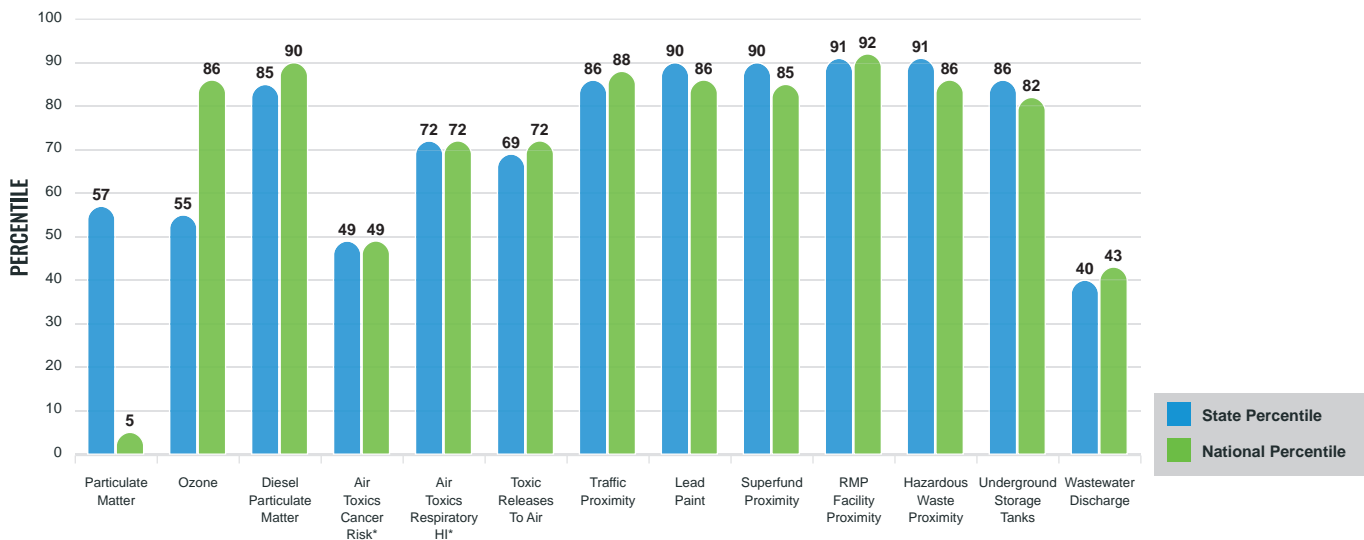
### EJ INDEXES FOR THE SELECTED LOCATION



## SUPPLEMENTAL INDEXES

The supplemental indexes offer a different perspective on community-level vulnerability. They combine data on percent low-income, percent linguistically isolated, percent less than high school education, percent unemployed, and low life expectancy with a single environmental indicator.

### SUPPLEMENTAL INDEXES FOR THE SELECTED LOCATION



These percentiles provide perspective on how the selected block group or buffer area compares to the entire state or nation.

Report for 1 mile Ring Centered at 32.208022,-110.897568

# EJScreen Environmental and Socioeconomic Indicators Data

SELECTED VARIABLES	VALUE	STATE AVERAGE	PERCENTILE IN STATE	USA AVERAGE	PERCENTILE IN USA
<b>POLLUTION AND SOURCES</b>					
Particulate Matter ( $\mu\text{g}/\text{m}^3$ )	4.74	5.87	27	8.08	2
Ozone (ppb)	62.8	66.1	27	61.6	62
Diesel Particulate Matter ( $\mu\text{g}/\text{m}^3$ )	0.389	0.278	72	0.261	82
Air Toxics Cancer Risk* (lifetime risk per million)	20	25	13	25	5
Air Toxics Respiratory HI*	0.3	0.31	30	0.31	31
Toxic Releases to Air	400	2,800	39	4,600	43
Traffic Proximity (daily traffic count/distance to road)	230	190	74	210	78
Lead Paint (% Pre-1960 Housing)	0.5	0.089	94	0.3	74
Superfund Proximity (site count/km distance)	0.085	0.077	76	0.13	61
RMP Facility Proximity (facility count/km distance)	1.1	0.38	92	0.43	89
Hazardous Waste Proximity (facility count/km distance)	1.6	0.71	88	1.9	69
Underground Storage Tanks (count/km <sup>2</sup> )	2.7	1.7	80	3.9	65
Wastewater Discharge (toxicity-weighted concentration/m distance)	5.6	5.8	93	22	95
<b>SOCIOECONOMIC INDICATORS</b>					
Demographic Index	62%	38%	82	35%	84
Supplemental Demographic Index	22%	14%	80	14%	83
People of Color	68%	44%	77	39%	77
Low Income	56%	32%	84	31%	86
Unemployment Rate	7%	6%	69	6%	70
Limited English Speaking Households	8%	4%	83	5%	82
Less Than High School Education	15%	12%	71	12%	72
Under Age 5	8%	5%	74	6%	74
Over Age 64	12%	20%	43	17%	36
Low Life Expectancy	22%	19%	81	20%	77

\*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

**Sites reporting to EPA within defined area:**

Superfund .....	0
Hazardous Waste, Treatment, Storage, and Disposal Facilities .....	0
Water Dischargers .....	2
Air Pollution .....	0
Brownfields .....	0
Toxic Release Inventory .....	0

**Other community features within defined area:**

Schools .....	8
Hospitals .....	0
Places of Worship .....	7

**Other environmental data:**

Air Non-attainment .....	No
Impaired Waters .....	No

Selected location contains American Indian Reservation Lands* .....	No
Selected location contains a "Justice40 (CEJST)" disadvantaged community .....	Yes
Selected location contains an EPA IRA disadvantaged community .....	Yes

Report for 1 mile Ring Centered at 32.208022,-110.897568

## EJScreen Environmental and Socioeconomic Indicators Data

### HEALTH INDICATORS

INDICATOR	HEALTH VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Low Life Expectancy	22%	19%	81	20%	77
Heart Disease	6.2	6	61	6.1	52
Asthma	11.9	10.6	89	10	90
Cancer	5.2	6.1	45	6.1	29
Persons with Disabilities	13.2%	13.9%	54	13.4%	54

### CLIMATE INDICATORS

INDICATOR	HEALTH VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Flood Risk	0%	6%	29	12%	12
Wildfire Risk	0%	48%	0	14%	0

### CRITICAL SERVICE GAPS

INDICATOR	HEALTH VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Broadband Internet	9%	13%	51	14%	42
Lack of Health Insurance	8%	10%	43	9%	55
Housing Burden	Yes	N/A	N/A	N/A	N/A
Transportation Access	Yes	N/A	N/A	N/A	N/A
Food Desert	Yes	N/A	N/A	N/A	N/A

Footnotes

Report for 1 mile Ring Centered at 32.208022,-110.897568



## 2023 FFIEC Geocode Census Report

Address: 4431 East 22nd Street, Tucson, Arizona, 85711  
 MSA: 46060 - TUCSON, AZ  
 State: 04 - ARIZONA  
 County: 019 - PIMA COUNTY  
 Tract Code: 0035.05

### Summary Census Demographic Information

Tract Income Level	Low
Underserved or Distressed Tract	No
2023 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	\$86,000
2023 Estimated Tract Median Family Income	\$37,487
2020 Tract Median Family Income	\$30,282
Tract Median Family Income %	43.59
Tract Population	4475
Tract Minority %	66.21
Tract Minority Population	2963
Owner-Occupied Units	622
1- to 4- Family Units	1189

### Census Income Information

Tract Income Level	Low
2020 MSA/MD/statewide non-MSA/MD Median Family Income	\$69,466
2023 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	\$86,000
% below Poverty Line	34.83
Tract Median Family Income %	43.59
2020 Tract Median Family Income	\$30,282
2023 Estimated Tract Median Family Income	\$37,487
2020 Tract Median Household Income	\$31,971

### Census Population Information

Tract Population	4475
Tract Minority %	66.21
Number of Families	1265
Number of Households	1790
Non-Hispanic White Population	1512
Tract Minority Population	2963
American Indian Population	76
Asian/Hawaiian/Pacific Islander Population	125
Black Population	440
Hispanic Population	2113
Other/Two or More Races Population	209

### Census Housing Information

Total Housing Units	2116
1- to 4- Family Units	1189
Median House Age (Years)	55
Owner-Occupied Units	622
Renter Occupied Units	1168
Owner Occupied 1- to 4- Family Units	622
Inside Principal City?	YES
Vacant Units	326