This ERR will be available through 7/12/2023

Please direct comments to: Rolanda Mazeika, rolanda.mazeika@tucsonaz.gov or 520-668-4453

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

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

Project Information

Project Name: HOME-ARP-Sleepy-Hollow-Estates-Demo-Aff-Hsg-Constr

HEROS Number: 900000010322668

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

RE Preparer: Rolanda Mazeika

State / Local Identifier:

Certifying Officer: Elizabeth (Liz) Morales

Grant Recipient (if different than Responsible Ent

ity):

Point of Contact:

Consultant (if applicabl

e):

Point of Contact:

Project Location: 615 W Alturas St, Tucson, AZ 85705

Additional Location Information:

The Sleepy Hollow Estates site is located at 613 and 615 W Alturas St, and 2440 N 15th Ave, Tucson, Pima County, Arizona, 85705, Pima County Assessor Parcel Number 107-09-066D. The site is located south of West Alturas Street, north of West Grant Road, east of North 15th Avenue, and west of North 14th Avenue Road, in the Miracle

Manor Neighborhood Association. The property description is: MIRACLE MILE LOTS 1 - 4 & 9 - 12 BLK 5.

Direct Comments to: rolanda.mazeika@tucsonaz.gov

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 Sleepy Hollow Estates project is a 44-unit, new construction, supportive affordable housing project for low-income families in the City of Tucson. Project activities include acquisition of one parcel, demolition of vacant structures and improvements, and new construction of duplexes consisting of nine, one-story residential units and 14, two-story residential units, one, one-story community building for resident services and management offices, and a common area with outside amenities on a 5.3-acre site. The project includes 12, one-bedroom/one-bathroom units, 22, two-bedroom/one-bathroom units, and 10, threebedroom/two-bathroom units. The units will serve households earning up to 60% of the Area Median Income. Forty-four (44) Section 8 Project-Based Vouchers will be allocated to this project by the City of Tucson Public Housing Authority. Supportive services, including a residential services coordinator, will be available to residents from La Frontera Center, Inc., a sister agency to La Frontera Partners, Inc., a state-certified Community Housing Development Organization, the project developer, both under La Frontera Arizona, Inc., a nonprofit corporation. The project will be designed in compliance with the 2022-2023 State of Arizona Qualified Allocation Plan Mandatory Design Guidelines, which include energy efficient building elements such as Energy Star qualified fixtures and appliances, low flow plumbing fixtures, green label materials, efficient HVAC systems, and Home Energy Rating System (HERS) Index standards. The project includes onsite parking spaces. The project will comply with fair housing and accessibility requirements. Site preparation involves the demolition of buildings, structures, and improvements outside the western boundaries of the Miracle Mile Historic District. Estimated project funding: \$2,000,000 in HOME Investment Partnerships American Rescue Plan (HOME-ARP) funds, grant number M-21-DP-04-0229 through the City of Tucson Housing and Community Development Department. The Sleepy Hollow Estates site is located at 613 and 615 W Alturas St, and 2440 N 15th Ave, Tucson, Pima County, Arizona, 85705, Pima County Assessor Parcel Number 107-09-066D. The site is located south of West Alturas Street, north of West Grant Road, east of North 15th Avenue, and west of North 14th Avenue Road, in the Miracle Manor Neighborhood Association. The property description is: MIRACLE MILE LOTS 1 - 4 & 9 - 12 BLK 5.

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, HOME-funded transitional housing; and Construction of affordable rental housing, including supportive housing, HOME transitional housing; monthly rental assistance. The project serves the program purpose of increasing the supply of much needed affordable housing in the City of Tucson. This project is applying for Arizona Department of Housing Low Income Housing Tax Credits. 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 (tucsonaz.gov/pdsd/plan-tucson). The site is located in the Thrive in the 05, a collaboration of Innovations in Community-Based Crime Reduction, Choice Neighborhoods, and Workforce & Economic Development in the 85705 zip code.

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

This project is located south of West Alturas Street, north of West Grant Road, east of North 15th Avenue, and west of North 14th Avenue Road with primary access from Alturas Street. Tucson's regional transit system including Sun Tran, Sun Express, and Sun Van provide service to nearby arterial streets, Grant and Oracle Roads, and bus stops are within walking distance of the site. Two bus lines travel along Oracle Road, and one bus line travels along Grant Road. 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 near the Oracle Road commercial corridor and is 500 feet north of Grant Road, another arterial road. Vacant buildings, structures, and improvements related to former mobile home operations are onsite and are slated for demolition in anticipation of construction of the new affordable housing community. 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. The adjoining sites consist of the following: North, following Alturas Street, is a mobile home park (615 West Jacinto Street); South are residential/liquor store, vacant lot, and retail stores (688 West Grant Road, no address, and 500 West Grant Road); East, following 14th Avenue, is a mobile home park (2444 North 14th Avenue); and West, following 15th Avenue, are various residential properties.

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

2023-5-2 Alturas Aerial Map.pdf 2022-12-21 Ph I ESA Site Photographs.pdf

2022-3-29 Ph I ESA Site Photographs.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:

2023-6-26 Signature Page 1.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
M-21-DP-04-0229	Community Planning and	HOME American Rescue Plan (HOME-
	Development (CPD)	ARP)

Estimated Total HUD Funded, \$2,000,000.00
Assisted or Insured Amount:

Estimated Total Project Cost [24 CFR 58.2 (a) \$21,094,359.00

(5)]:

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

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6	Are formal compliance steps or mitigation required?	Compliance determination (See Appendix A for source determinations)			
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6					
Airport Hazards	☐ Yes ☑ No	The project site is not within 15,000 feet			
Clear Zones and Accident Potential		of a military airport or 2,500 feet of a			
Zones; 24 CFR Part 51 Subpart D		civilian airport. The project is in			

		compliance with Airport Hazards
		requirements.
Coastal Barrier Resources Act	☐ Yes ☑ No	This project is located in a state that
Coastal Barrier Resources Act, as		does not contain CBRS units. There are
amended by the Coastal Barrier		no CBRS units in Arizona. Therefore, this
Improvement Act of 1990 [16 USC		project is in compliance with the Coastal
3501]		Barrier Resources Act.
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001- 4128 and 42 USC 5154a]	☐ Yes ☑ No	The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area. FEMA Zone X, 04019C 1688L, 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.
STATUTES EXECUTIVE OFF	LEDS AND DECLIFATION	ONS LISTED AT 24 CFR §50.4 & § 58.5
•	1	
Air Quality Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	☐ Yes ☑ No	The project's county or air quality management district is in nonattainment status for the following: Carbon monoxide (Tucson), Particulate Matter, <10 microns(Ajo & Rillito). The Arizona Department of Environmental Quality (ADEQ) and PDEQ sites have been reviewed and these agencies have no concerns about multi-family or small apartment complex development in existing residential areas changing or adversely impacting air quality control standards. Memo from Richard Grimaldi, PDEQ, dated 12/18/2019. This project does not exceed de minimis emissions levels or the screening level established by the state or air quality management district for the pollutant(s) identified above. The project is in compliance with the Clean Air Act.
Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d)	☐ Yes ☑ No	This project is located in a state that does not participate in the Coastal Zone Management Program. Arizona has no coastal areas. Therefore, this project is

		in compliance with the Coastal Zone
		Management Act.
Contamination and Toxic Substances	☑ Yes □ No	
24 CFR 50.3(i) & 58.5(i)(2)]		
Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	☐ Yes ☑ No	This project will have No Effect on listed species on an e-mail from the US Fish and Wildlife Service dated dated 6/2/2023. This project is in compliance with the Endangered Species Act.
Explosive and Flammable Hazards Above-Ground Tanks)[24 CFR Part 51 Subpart C	□ Yes ☑ No	After review of the Phase I Environmental Site Assessments by Western Technologies, Inc. dated 3/30/2022 and 1/23/2023, a site visit by City of Tucson Housing and Community Development staff, and review of known environmental registrations and maps, the determination is that the project site is not in the vicinity of any hazardous operation involving explosive or flammable fuels or chemicals. There are no current or planned stationary aboveground storage containers of concern within 1 mile of the project site. The project is in compliance with explosive and flammable hazard requirements.
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	☐ Yes ☑ No	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. This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is in compliance with the Farmland Protection Policy Act.
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	☐ Yes ☑ No	This project does not occur in a floodplain. FEMA Zone X, 04019C 1688L, 6/16/2011. The project is in compliance with Executive Order 11988.

Historic Preservation	☑ Yes □ No	A cultural resources survey is in			
National Historic Preservation Act of		progress in accordance with the			
1966, particularly sections 106 and		Programmatic Agreement dated			
110; 36 CFR Part 800		1/25/2002 (property is 45+ years old,			
,		outside an established historic district,			
		project includes demolition and new			
		construction activities). The project is in			
		compliance with Section 106.			
Noise Abatement and Control	☐ Yes ☑ No	A Noise Assessment was conducted. The			
Noise Control Act of 1972, as		noise level was acceptable: 64.0 db. See			
amended by the Quiet Communities		noise analysis, Spendarian & Willis Willis			
Act of 1978; 24 CFR Part 51 Subpart		Acoustics & Noise Control, LLC,			
В		2/7/2023. The project is in compliance			
		with HUD's Noise regulation.			
Sole Source Aquifers	☐ Yes ☑ No	The project is located on a sole source			
Safe Drinking Water Act of 1974, as		aquifer. The region has an MOU or			
amended, particularly section		other working agreement with EPA for			
1424(e); 40 CFR Part 149		HUD projects impacting a sole source			
1424(0), 40 01 11 143		aquifer, and the MOU or working			
		agreement excludes the project from			
		further review. The project will utilize			
		existing municipal water and			
		· ·			
		wastewater facilities. The project is in			
		compliance with Sole Source Aquifer			
Wallanda Bardani'a		requirements.			
Wetlands Protection	☐ Yes ☑ No	The project will not impact on- or off-			
Executive Order 11990, particularly		site wetlands. The project is in			
sections 2 and 5		compliance with Executive Order 11990.			
Wild and Scenic Rivers Act	☐ Yes ☑ No	This project is not within proximity of a			
Wild and Scenic Rivers Act of 1968,		NWSRS river. There are no NWSRS rivers			
particularly section 7(b) and (c)		in Southern Arizona. The project is in			
		compliance with the Wild and Scenic			
		Rivers Act.			
HUD HO	DUSING ENVIRONME	NTAL STANDARDS			
	ENVIRONMENTAL JUSTICE				
Environmental Justice	☐ Yes ☑ No	No adverse environmental impacts were			
Executive Order 12898		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.

Environmental	Impact	Impact Evaluation	Mitigation
Assessment	Code	•	
Factor			
		LAND DEVELOPMENT	
Conformance	1	The project consists of acquisition,	
with Plans /		demolition, and redevelopment of the	
Compatible		currently mostly vacant and dilapidated	
Land Use and		former mobile home park with newly	
Zoning / Scale		constructed supportive affordable housing	
and Urban		that conforms within the surrounding	
Design		neighborhoods in terms of overall scale,	
		density, size, and massing. The demolition	
		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 MH-1. The project supports the	
		goals of Plan Tucson, the 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. The	
		project also supports the goals of the	
		Tucson-Pima HUD 5 Year Consolidated	
		Plan. The project will meet the City's	
		Housing Quality Standards (HQS). Planning	
		and Zoning verification by Nick Ross, PDSD,	
	_	dated 12/14/2022.	2 11 11 1
Soil Suitability /	2	No evidence of erosion, drainage/storm	Soil conditions can
Slope/ Erosion /		water runoff during site visit by HCD staff	be made suitable

Environmental Assessment	Impact Code	Impact Evaluation	Mitigation
Factor			
Drainage and Storm Water Runoff		5/23/2023. Geotechnical Engineering Evaluation by Pattison Engineering, LLC dated 1/20/2023 concluded the site's natural subsurface soil conditions can be made suitable for support of the proposed development provided the designers, contractors, and owners follow the report recommendations. Phase I ESAs by Western Technologies dated 3/20/2022 and 1/23/2023.	for support of the proposed development provided the designers, contractors, and owners follow the report recommendations.
Hazards and Nuisances including Site Safety and Site- Generated Noise	3	Soil vapor impacts were identified in the ASTM Phase I Environmental Sites Assessment and Soil Assessment conducted by Western Technologies Inc., report dated 1/23/2023. Asbestos Containing Material (ACM) was identified in the older vacant buildings, structures, and improvements on the site during the Asbestos Survey conducted by Western Technologies Inc. No other evidence of onsite hazards or nuisances including soil contamination; proximity to high pressure pipe lines or other volatile and explosive products; high-voltage transmission lines; radio/TV transmission towers; excessive smoke, fumes, odors subsidence, ground water, inadequate surface drainage, flood, etc. Tucson Electric Power owned transformers on or near the sites were all in good condition with no evidence of spills or leakage. There are no visible poisonous plants or animals on the site. No known natural hazards exist. The sites have access to intersections with cross walks 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. Phase I Environmental Site Assessment by Western Technologies, Inc. dated 3/30/2022 and	Mitigation of soil vapor impacts include conducting a Tier I & II Vapor Encroachment Screening and installing a subslab vapor barrier for VOCs for all new construction. Mitigation of ACM includes asbestos safe work practices during demolition. Control of dust and minimizing the release of asbestos-containing material during construction is required under the PDEQ Fugitive Dust Permit and the PDEQ Asbestos National Emissions Standards for Hazardous Air Pollutants (NESHAP) permit.

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		1/23/2023 and site visit by HCD staff on 5/3/2023.	
		SOCIOECONOMIC	l
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, demolition, and redevelopment of the currently mostly vacant and dilapidated former mobile home park with newly constructed supportive affordable housing. The project will follow Section 3 and Davis Bacon requirements in all employment, construction, and subcontracting activities. 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 moderate income, a mix of low- to high-density residential, mid-rise, office, medical, civic, and select other uses, general community uses that serve the community and region; and industrial uses that do not have offensive characteristics in addition to land uses permitted in more restrictive nonresidential zones, the area has a 70.12% minority population, and approximately 54% of housing units being renter-occupied. The project consists of acquisition, demolition, and redevelopment of the currently mostly vacant and dilapidated former mobile home park with newly constructed supportive affordable housing.	
Environmental Justice EA Factor	2	The project site is in an area of moderate income, a mix of low- to high-density residential, mid-rise, office, medical, civic,	

Environmental	Impact	Impact Evaluation	Mitigation
Assessment	Code	P	
Factor			
1 0.0001		and select other uses, general community	
		uses that serve the community and region;	
		and industrial uses that do not have	
		offensive characteristics in addition to land	
		uses permitted in more restrictive	
		nonresidential zones, the area has a	
		70.12% minority population, and	
		approximately 54% 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, commercial hazardous waste	
		generators, RMP Facilities, UST sites, air	
		quality, and State Superfund proximity	
		(Stone Avenue and Grant Road WQARF	
		site). The project consists of acquisition,	
		demolition, and redevelopment of the	
		currently mostly vacant and dilapidated	
		former mobile home park with newly	
		constructed supportive affordable housing.	
		A Tier I & II Vapor Encroachment Screening	
		is being conducted and installation of a	
		sub-slab vapor barrier for VOCs is required	
		for all new construction. Appropriate	
		handling of asbestos containing materials	
		will be required during demolition. 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. Development of the HOME-	
		ARP Allocation Plan included a robust	
		consultation and public comment process	
		including agencies/organizations whose	
		operations and clientele would be directly	

Factor impacted by the Plan's activities. The project will have minimal impact to neighboring residents/occupants while improving the area's building stock. COMMUNITY FACILITIES AND SERVICES Educational and 2 The project consists of acquisition, demolition, and redevelopment of the currently mostly vacant and dilapidated	
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Educational and Cultural COMMUNITY FACILITIES AND SERVICES The project consists of acquisition, demolition, and redevelopment of the	
Educational and 2 The project consists of acquisition, demolition, and redevelopment of the	
Cultural demolition, and redevelopment of the	
· · · · · · · · · · · · · · · · · · ·	
Facilities	
' ' '	
(Access and former mobile home park with newly	
Capacity) constructed supportive affordable housing	
with minor impact to area schools.	
Neighborhood residents are served by 13	
pre-/day-, elementary, and middle, and	
high schools within walking distance	
and/or 6-minute driving distance.	
Educational and cultural enrichment	
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 2 The project consists of acquisition.	
' ' ' '	
(Access and currently mostly vacant and dilapidated former mobile home park with newly	
Proximity) former mobile home park with newly constructed supportive affordable 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 / 1 The project site is within 4 miles of major	
Social Services medical centers and emergency rooms.	
(Access and Numerous emergency facilities, clinics, and	
Capacity) physician services are within an easy	
commute on public transit. Nearby support	
services include CODAC Behavioral Health,	
COPE Community Services, and La Frontera	

Environmental	Impact	Impact Evaluation	Mitigation
Assessment	Code		
Factor			
		facilities. The additional residents will not have an adverse impact on available services since supportive services will be available onsite to residents.	
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.	Asbestos containing building material (ACBM) generated during demolition will be disposed of in accordance to NESHAP regulations.
Waste Water and Sanitary Sewers (Feasibility and Capacity)	2	The project consists of acquisition, demolition, and redevelopment of the currently mostly vacant and dilapidated former mobile home park with newly constructed supportive affordable housing. Pima County Wastewater provides wastewater and sewer service to the project site. Wastewater and sewer service is not anticipated to be impacted by foreseeable climate changes.	
Water Supply (Feasibility and Capacity)	2	The project consists of acquisition, demolition, and redevelopment of the currently mostly vacant and dilapidated former mobile home park with newly constructed supportive affordable housing. Tucson Water currently provides water service to the site and will provide water service to project after project completion. 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.	
Public Safety - Police, Fire and	2	The project site is less than two miles from Tucson Fire Station 4. The site is within two	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Emergency		miles of Tucson Police Department Rillito	
Medical		Station. 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 four miles of	
		major medical centers with emergency	
		medical care, including Banner UMC	
		Medical Center and urgent care facilities.	
Parks, Open	2	The project consists of acquisition,	
Space and		demolition, and redevelopment of the	
Recreation		currently mostly vacant and dilapidated	
(Access and		former mobile home park with newly	
Capacity)		constructed supportive affordable housing,	
		which includes common area amenities.	
		The site is within 1.5 miles from nine parks	
		and two recreation centers. The Donna	
		Liggins recreation center provides senior	
		programs, services, activities and a senior	
		meal program. The project site is also	
		within three miles of the Oury Recreation	
		Center and Armory Park Senior Center.	
Transportation	2	The project is located near two arterial	
and		roads with excellent bus access,	
Accessibility		crosswalks, sidewalk, and bicycle lanes.	
(Access and		Tucson's regional transit system including	
Capacity)		Sun Tran, Sun Express, and Sun Van	
		provide service to the Grant and Oracle	
		Roads (nearby arterials). Two bus lines	
		travel north/south along Oracle Road, and	
		one bus line travels east/west along Grant	
		Road and bus stops are within walking	
		distance of the site. Onsite parking will be	
		available.	
	T	NATURAL FEATURES	1
Unique Natural	2	There are no unique natural or water	
Features		features on or nearby the site.	
/Water			
Resources			
Vegetation /	2	The site was formerly fully developed	
Wildlife		(former mobile home park buildings,	
(Introduction,		structures, and improvements) with	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Modification,		minimal vegetation. The property is	
Removal,		currently mostly vacant and dilapidated.	
Disruption, etc.)		There are no visible signs of wildlife at this property.	
Other Factors 1			
Other Factors 2			
	•	CLIMATE AND ENERGY	
Climate Change	2	The project consists of acquisition, demolition, and redevelopment of the currently mostly vacant and dilapidated former mobile home park with newly constructed supportive affordable housing. The project will be designed in compliance with the 2022-2023 State of Arizona Qualified Allocation Plan Mandatory Design Guidelines, which include energy efficient building elements such as Energy Star qualified fixtures and appliances, low flow plumbing fixtures, green label materials, efficient HVAC systems, and Home Energy Rating System (HERS) Index standards. Climate predictions forecast increased average daily temperatures and decreased annual precipitation for the area.	
Energy Efficiency	3	The project consists of acquisition, demolition, and redevelopment of the currently mostly vacant and dilapidated former mobile home park with newly constructed supportive affordable housing. Increase in energy consumption by new construction of 44 units of housing and community building. Buildings will meet the sustainable requirements of the 2022-2023 State of Arizona Qualified Allocation Plan Mandatory Design Guidelines, which include energy efficient building elements such as Energy Star qualified fixtures and appliances, low flow plumbing fixtures, green label materials, efficient HVAC systems, and Home Energy Rating System (HERS) Index standards. Minimal water use	

Hollow-Estates-Demo-Aff-Hsg-Constr

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		anticipated for dust control during demolition and site maintenance activities.	

Supporting documentation

2023-6-26 Alturas Transit Map.pdf

2023-6-26 Alturas Google Map Urgent Care.pdf

2023-6-26 Alturas Google Map Thrift.pdf

2023-6-26 Alturas Google Map Schools.pdf

2023-6-26 Alturas Google Map Recreation Center.pdf

2023-6-26 Alturas Google Map Police.pdf

2023-6-26 Alturas Google Map Pharmacy.pdf

2023-6-26 Alturas Google Map Parks.pdf

2023-6-26 Alturas Google Map Mental Health.pdf

2023-6-26 Alturas Google Map Medical.pdf

2023-6-26 Alturas Google Map Library.pdf

2023-6-26 Alturas Google Map Grocery.pdf

2023-6-26 Alturas Google Map Fire Station.pdf

2023-6-26 Alturas Google Map Community Center.pdf

2023-6-26 Alturas FFIEC.pdf

2023-3-21 PC Av Total Precipitation.pdf

2023-3-21 PC Av Daily Max Temp.pdf

2022-12-14 Alturas Zoning Appr.pdf

Additional Studies Performed:

Field Inspection [Optional]: Date and completed

by:

Amie Town 12/21/2022 12:00:00 AM

2022-12-21 Ph I ESA Site Photographs.pdf 2022-3-29 Ph I ESA Site Photographs.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, City Manager's Office-Liz Morales; 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; Pima County Wastewater Management; Pima County Department of Environmental Quality-Rupesh Patel; City of City of Tucson-Pima County HOME Consortium HOME-ARP Allocation Plan-

https://www.tucsonaz.gov/files/hcd/Documents/Plans/City_of_Tucson-Pima_County_HOME-ARP_Allocation_Plan.pdf, Plan Tucson-https://www.tucsonaz.gov/pdsd/plan-tucson

2023-6-26 Craycroft contact list.pdf

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 6/27/2023. 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/hcd/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, demolition, and new construction of supportive affordable housing is located in west-central Tucson, in an area of moderate income, a mix of low- to high-density residential, mid-rise, office, medical, civic, and select other uses, general community uses that serve the community and region; and industrial uses that do not have offensive characteristics. The project will be a minor contributor to the projected 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, demolition, and new construction of supportive affordable housing would not occur. Goals of the City of Tucson-Pima County HOME Consortium HOME-ARP Allocation Plan would not be fulfilled. Improvement of the current mostly vacant and dilapidated former mobile home park with newly constructed supportive affordable housing would not occur.

Summary of Findings and Conclusions:

The proposed acquisition, demolition, and new construction of supportive affordable housing will not adversely affect the environment or the neighborhood. The activity is compatible with the existing mix of low- to high-density residential, mid-rise, office, medical, civic, and select other uses, general community uses that serve the community and region; and industrial uses that do not have offensive characteristics. 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 nonconformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law,	Mitigation Measure or	Comments	Mitigation Plan	Complete
Authority, or	Condition	on		
Factor		Completed		
		Measures		
Contamination	Soil vapor impacts were	N/A	Mitigation of soil	
and Toxic	identified in the ASTM		vapor impacts	
Substances	Phase I Environmental		include	
	Sites Assessment and Soil		conducting a Tier I	
	Assessment conducted by		& II Vapor	
	Western Technologies Inc.,		Encroachment	
	report dated 1/23/2023.		Screening and	
	Mitigation of soil vapor		installing a sub-	
	impacts include conducting		slab vapor barrier	

Soil Suitability	a Tier I & II Vapor Encroachment Screening and installing a sub-slab vapor barrier for VOCs for all new construction. Asbestos Containing Material (ACM) was identified in the older vacant buildings, structures, and improvements on the site during the Asbestos Survey conducted by Western Technologies Inc. Mitigation of ACM includes asbestos safe work practices during demolition. Soil conditions can be	N/A	for VOCs for all new construction. Mitigation of ACM includes asbestos safe work practices during demolition. Designers,
/ Slope/ Erosion /	made suitable for support of the proposed		contractors, and owners follow the
Drainage and	development provided the		geotechnical
Storm Water Runoff	designers, contractors, and owners follow the report recommendations.		report recommendations.
Hazards and Nuisances including Site Safety and Site- Generated Noise	Mitigation of soil vapor impacts include conducting a Tier I & II Vapor Encroachment Screening and installing a sub-slab vapor barrier for VOCs for all new construction. Mitigation of ACM includes asbestos safe work practices during demolition. Control of dust and minimizing the release of asbestos-containing material during construction is required under the PDEQ Fugitive Dust Permit and the PDEQ Asbestos National Emissions Standards for	N/A	Mitigation of soil vapor impacts include conducting a Tier I & II Vapor Encroachment Screening and installing a sub- slab vapor barrier for VOCs for all new construction. Mitigation of ACM includes asbestos safe work practices during demolition.

	Hazardous Air Pollutants (NESHAP) permit.			
Solid Waste Disposal and Recycling (Feasibility and Capacity)	Asbestos containing building material (ACBM) generated during demolition will be disposed of in accordance to NESHAP regulations.	N/A	Asbestos containing building material (ACBM) generated during demolition will be disposed of in accordance to NESHAP regulations.	
Historic Preservation	A cultural resources survey is required by the Historic Preservation Programmatic Agreement dated 1/25/2002	N/A	COT-HCDD will conduct a cultural resources survey in accordance with the Programmatic Agreement dated 1/25/2002.	

Project Mitigation Plan

The project developer will be responsible for the following: Mitigation of soil vapor impacts include conducting a Tier I & II Vapor Encroachment Screening and installing a sub-slab vapor barrier for VOCs for all new construction. Mitigation of ACM includes asbestos safe work practices during demolition. Designers, contractors, and owners follow the geotechnical report recommendations. Asbestos containing building material (ACBM) generated during demolition will be disposed of in accordance to NESHAP regulations. COT-HCDD will be responsible for the following: COT-HCDD will conduct a cultural resources survey in accordance with the Programmatic Agreement dated 1/25/2002.

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		24 CFR Part 51 Subpart D
prevent incompatible development		
around civil airports and military airfields.		

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

√ No

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

Yes

Screen Summary

Compliance Determination

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

Supporting documentation

2023-5-2 Alturas Airport Map.pdf

Are formal compliance steps or mitigation required?

Yes

Coastal Barrier Resources

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

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

Flood Insurance

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

2023-5-2 Alturas 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 FEMAdesignated 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 1688L, 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

Air Quality

General requirements	Legislation	Regulation
The Clean Air Act is administered	Clean Air Act (42 USC 7401 et	40 CFR Parts 6, 51
by the U.S. Environmental	seq.) as amended particularly	and 93
Protection Agency (EPA), which	Section 176(c) and (d) (42 USC	
sets national standards on	7506(c) and (d))	
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.		

1.	oes your project include new construction or conversion of land use facilitating the
develop	nent 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

900000010322668

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 μg/m3 (micrograms per cubic meter

microns 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 (Tucson), Particulate Matter, <10 microns(Ajo & Rillito). The Arizona Department of Environmental Quality (ADEQ) and PDEQ sites have been reviewed and these agencies have no concerns about multi-family or small apartment complex development in existing residential areas changing or adversely impacting air quality control standards. Memo from Richard Grimaldi, PDEQ, dated 12/18/2019. This project does not exceed de minimis emissions levels or the screening level established by the state or air quality management district for the pollutant(s) identified above. The project is in compliance with the Clean Air Act.

Supporting documentation

Air quality memo 12-19-19.pdf 2023-5-22 Alturas PM10 EPA Green Book 4-30-23.pdf 2023-5-22 Alturas CO EPA Green Book 4-30-23.pdf

Are formal compliance steps or mitigation required?

Yes

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Coastal Zone Management Act

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

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. Arizona has no coastal areas. 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		24 CFR 58.5(i)(2)
proposed for use in HUD programs be free of		24 CFR 50.3(i)
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.		

- 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?

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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.

Soil vapor impacts were identified in the ASTM Phase I Environmental Sites Assessment and Soil Assessment conducted by Western Technologies Inc., report dated 1/23/2023. Mitigation of soil vapor impacts include conducting a Tier I & II Vapor Encroachment Screening and installing a sub-slab vapor barrier for VOCs for all new construction. Asbestos Containing Material (ACM) was identified in the older vacant buildings, structures, and improvements on the site during the Asbestos Survey conducted by Western Technologies Inc. Mitigation of ACM includes asbestos safe work practices during demolition.

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

Complete removal

Risk-based corrective action (RBCA)

<u>Screen Summary</u> Compliance Determination

Supporting documentation

2023-1-30 615 W Alturas St Lead TCLP Report WTI.pdf

2023-1-30 615 W Alturas St Asb Survey WTI.pdf

2023-1-23 615 W Alturas St Phase I ESA Soil Assmt WTI.pdf

2022-3-30 615 W ALTURAS ST Phase 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)	The Endangered	50 CFR Part
mandates that federal agencies ensure that	Species Act of 1973	402
actions that they authorize, fund, or carry out	(16 U.S.C. 1531 et	
shall not jeopardize the continued existence of	seq.); particularly	
federally listed plants and animals or result in	section 7 (16 USC	
the adverse modification or destruction of	1536).	
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").		

1. Does the project involve any activities that have the potential to affect specifies 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

Explain your determination:
US Fish and Wildlife Service e-mail dated 6/2/2023

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

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

Screen Summary

Compliance Determination

This project will have No Effect on listed species on an e-mail from the US Fish and Wildlife Service dated dated 6/2/2023. This project is in compliance with the Endangered Species Act.

Supporting documentation

2023-6-2 Alturas FWS TE Species No Effect Determination.pdf Critical Habitat Map NEPA Assist 7-15-19.pdf

Are formal compliance steps or mitigation required?

Yes

Explosive and Flammable Hazards

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

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

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

Yes

Screen Summary

Compliance Determination

After review of the Phase I Environmental Site Assessments by Western Technologies, Inc. dated 3/30/2022 and 1/23/2023, a site visit by City of Tucson Housing and Community Development staff, and review of known environmental registrations and maps, the determination is that the project site is not in the vicinity of any hazardous operation involving explosive or flammable fuels or chemicals. There are no current or planned stationary aboveground storage containers of concern within 1 mile of the project site. The project is in compliance with explosive and flammable hazard requirements.

Supporting documentation

2023-5-2 Alturas Aerial Map(1).pdf

Are formal compliance steps or mitigation required?

Yes

Farmlands Protection

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

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



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

The site is in a fully-developed, urban environment per the US Census Urban Area map printed 7/5/2022.

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

Screen Summary

Compliance Determination

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. This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is in compliance with the Farmland Protection Policy Act.

Supporting documentation

US Census Urban Area Map 2022-7-5.pdf

Are formal compliance steps or mitigation required?

Yes

Floodplain Management

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

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:

2023-5-2 Alturas 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

HOME-ARP-Sleepy-Hollow-Estates-Demo-Aff-Hsg-Constr

Screen Summary

Compliance Determination

This project does not occur in a floodplain. FEMA Zone X, 04019C 1688L, 6/16/2011. The project is in compliance with Executive Order 11988.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

Historic Preservation

General requirements	Legislation	Regulation
Regulations under	Section 106 of the	36 CFR 800 "Protection of Historic
Section 106 of the	National Historic	Properties"
National Historic	Preservation Act	https://www.govinfo.gov/content/pkg/CF
Preservation Act	(16 U.S.C. 470f)	R-2012-title36-vol3/pdf/CFR-2012-title36-
(NHPA) require a		vol3-part800.pdf
consultative process		
to identify historic		
properties, assess		
project impacts on		
them, and avoid,		
minimize, or mitigate		
adverse effects		

Threshold

Is Section 106 review required for your project?

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

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

Step 1 – Initiate Consultation Select all consulting parties below (check all that apply):

Indian Tribes, including Tribal Historic Preservation Officers (THPOs) or Native Hawaiian Organizations (NHOs)

✓ Other Consulting Parties

✓ City of Tucson, Historic Preservation Office

In progress

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

A cultural resources survey is in progress in accordance with the Programmatic Agreement dated 1/25/2002 (property is 45+ years old, outside an established historic district, project includes demolition and new construction activities)

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

Was the Section 106 Lender Delegation Memo used for Section 106 consultation?

Yes

No

Step 2 – Identify and Evaluate Historic Properties

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

615 W Alturas St, Tucson, Pima County, AZ 85705

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

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

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

Additional Notes:

A cultural resources survey is in progress in accordance with the Programmatic Agreement dated 1/25/2002 (property is 45+ years old, outside an established historic district, project includes demolition and new construction activities)

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

✓ Yes

Document and upload surveys and report(s) below.

For Archeological surveys, refer to HP Fact Sheet #6, Guidance on Archeological Investigations in HUD Projects.

Additional Notes:

A cultural resources survey is in progress in accordance with the Programmatic Agreement dated 1/25/2002 (property is 45+ years old, outside an established historic district, project includes demolition and new construction activities)

No

Step 3 –Assess Effects of the Project on Historic Properties

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

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

✓ No Historic Properties Affected

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

Document reason for finding:

No historic properties present.

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

No Adverse Effect

Adverse Effect

Screen Summary

Compliance Determination

A cultural resources survey is in progress in accordance with the Programmatic Agreement dated 1/25/2002 (property is 45+ years old, outside an established historic district, project includes demolition and new construction activities). The project is in compliance with Section 106.

Supporting documentation

HPO Programmatic agreement.pdf 2023-5-2 Alturas HPO Map.pdf

Are formal compliance steps or mitigation required?

✓ Yes

No

Noise Abatement and Control

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

- 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:

Hollow-Estates-Demo-Aff-Hsg-Constr

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: 64

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 nonresidential use compatible with high noise levels.

Indicate noise level here: 64

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

Screen Summary **Compliance Determination** HOME-ARP-Sleepy-Hollow-Estates-Demo-Aff-Hsg-Constr

A Noise Assessment was conducted. The noise level was acceptable: 64.0 db. See noise analysis, Spendarian & Willis Willis Acoustics & Noise Control, LLC, 2/7/2023. The project is in compliance with HUD's Noise regulation.

Supporting documentation

2023-2-7 615 W Alturas St HUD Noise Study Spendarian.pdf

Are formal compliance steps or mitigation required?

Yes

Sole Source Aquifers

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

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

Wetlands Protection

Hsg-Constr

General requirements	Legislation	Regulation
Executive Order 11990 discourages direct or	Executive Order	24 CFR 55.20 can be
indirect support of new construction impacting	11990	used for general
wetlands wherever there is a practicable		guidance regarding
alternative. The Fish and Wildlife Service's		the 8 Step Process.
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.		

 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

2023-5-2 Alturas Wetlands Map.pdf

Are formal compliance steps or mitigation required?

Yes

HOME-ARP-Sleepy-Hollow-Estates-Demo-Aff-Hsg-Constr

Wild and Scenic Rivers Act

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

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 rivers in Southern Arizona. The project is in compliance with the Wild and Scenic Rivers Act.

Supporting documentation

NWSRS Wild-Scenic Rivers 2022-7-7.pdf

Are formal compliance steps or mitigation required?

Yes

Environmental Justice

General requirements	Legislation	Regulation
Determine if the project	Executive Order 12898	
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.		

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

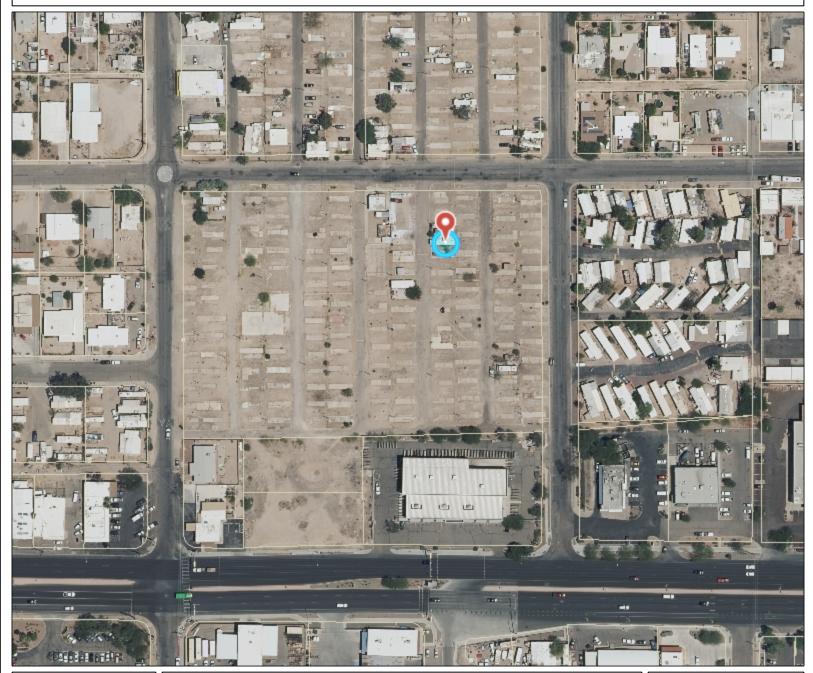
2023-6-26 Alturas EJ Screen.pdf

Are formal compliance steps or mitigation required?

Yes



613/615 W Alturas St, 2440 N 15th Ave, Tucson, AZ 85705



Notes

Aerial Map

Legend

- ... Land Fills -City/County
- Land Fills -State/Federal
- Leaking
 Underground
 Storage Tanks COT Owned
- Parcels
- → Railroads

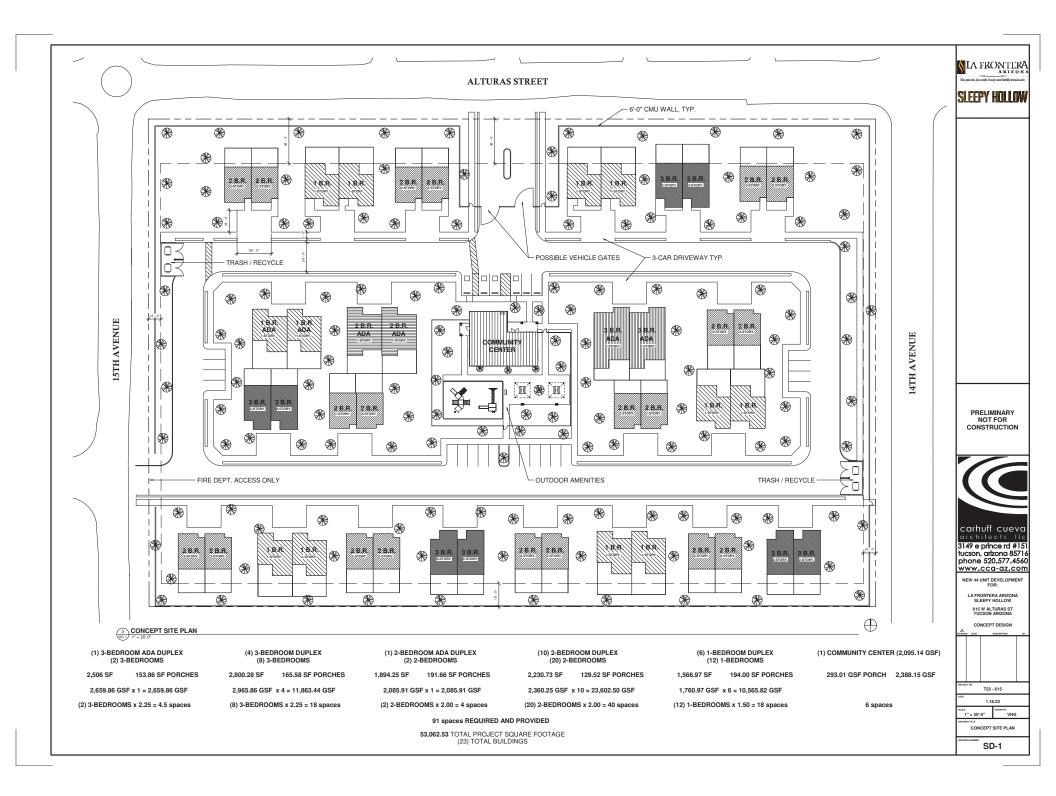
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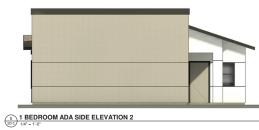
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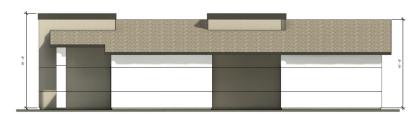


1 BEDROOM ADA SIDE ELEVATION 1



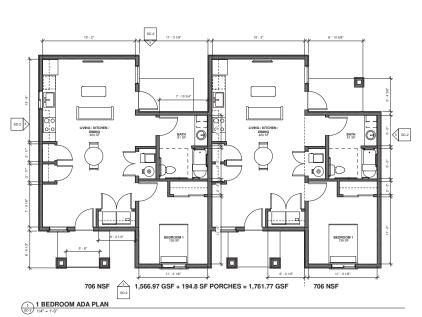


6 1 BEDROOM ADA 3D VIEW



3 1 BEDROOM ADA REAR ELEVATION





PRELIMINARY NOT FOR CONSTRUCTION



carhuff-cueva architects IIc 3149 e prince rd #151 tucson, arizona 85716 phone 520.577.4560 www.cca-az.com

NEW 44 UNIT DEVELOPMENT FOR:

LA FRONTERA ARIZONA SLEEPY HOLLOW 615 W ALTURAS ST TUCSON ARIZONA

CONCEPT DESIGN T23 - 615

1.18.23 1/4" = 1'-0" VHG

1-BEDROOM ADA DUPLEX

SD-2



3 2-BEDROOM ADA REAR ELEVATION 1/4" - 1'-0"





5 2-BEDROOM ADA SIDE ELEVATION 2

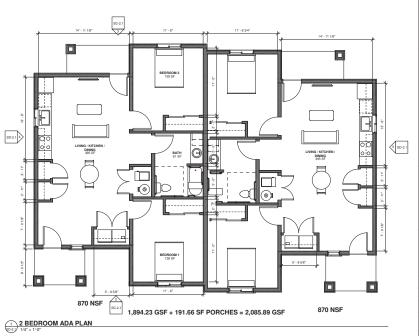
2-BEDROOM ADA SIDE ELEVATION 1











PRELIMINARY NOT FOR CONSTRUCTION

IA FRONTERA

SLEEPY HOLLOW



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NEW 44 UNIT DEVELOPMENT FOR:

LA FRONTERA ARIZONA SLEEPY HOLLOW 615 W ALTURAS ST TUCSON ARIZONA

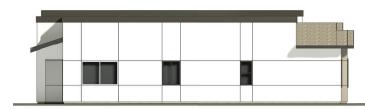
CONCEPT DESIGN

T23 - 615 1.18.23

1/4" = 1'-0" 2-BEDROOM ADA DUPLEX



5 3-BEDROOM ADA SIDE ELEVATION 2



4 3-BEDROOM ADA SIDE ELEVATION 1 1/4" = 1'-0"



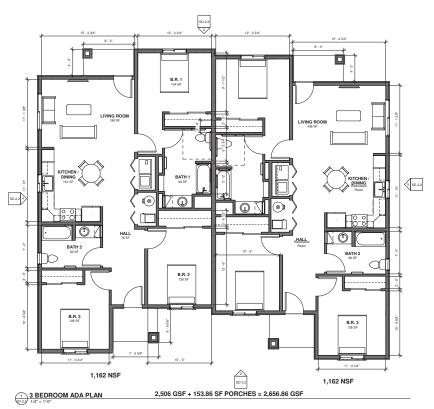
3 3-BEDROOM ADA REAR ELEVATION



3-BEDROOM ADA FRONT ELEVATION



6 3 BEDROOM ADA 3D VIEW



PRELIMINARY NOT FOR CONSTRUCTION



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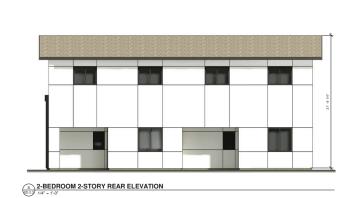
NEW 44 UNIT DEVELOPMENT FOR:

LA FRONTERA ARIZONA SLEEPY HOLLOW 615 W ALTURAS ST TUCSON ARIZONA

CONCEPT DESIGN

T23 - 615 1.18.23 1/4" = 1'-0" Author

3-BEDROOM ADA DUPLEX





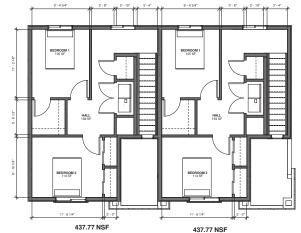
3 2-BEDROOM 2-STORY FRONT ELEVATION 1/4" = 1'-0"



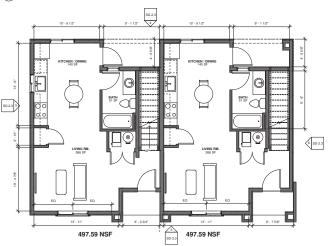




7 2 BEDROOM 2-STORY 3D VIEW



2 BEDROOM PLAN LEVEL 2



1,113.34 SF + 1,117.39 SF = 2,230.73 SF + 129.52 SF PORCHES = 2,360.25 GSF

2 BEDROOM PLAN LEVEL 1

IA FRONTERA SLEEPY HOLLOW

> PRELIMINARY NOT FOR CONSTRUCTION



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LA FRONTERA ARIZONA SLEEPY HOLLOW 615 W ALTURAS ST TUCSON ARIZONA

CONCEPT DESIGN

T23 - 615 1.18.23

1/4" = 1'-0" VHG

2-BEDROOM 2-STORY DUPLEX





3 BEDROOM 2-STORY 3D VIEW

3-BEDROOM 2-STORY REAR ELEVATION

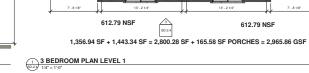


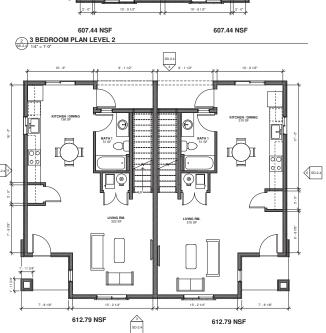
3 3-BEDROOM 2-STORY FRONT ELEVATION



5 3-BEDROOM 2-STORY SIDE ELEVATION 1







BEDROOM 3 104 SF

Oy

BEDROOM 3 104 SF

PRELIMINARY NOT FOR CONSTRUCTION

BEDROOM 2



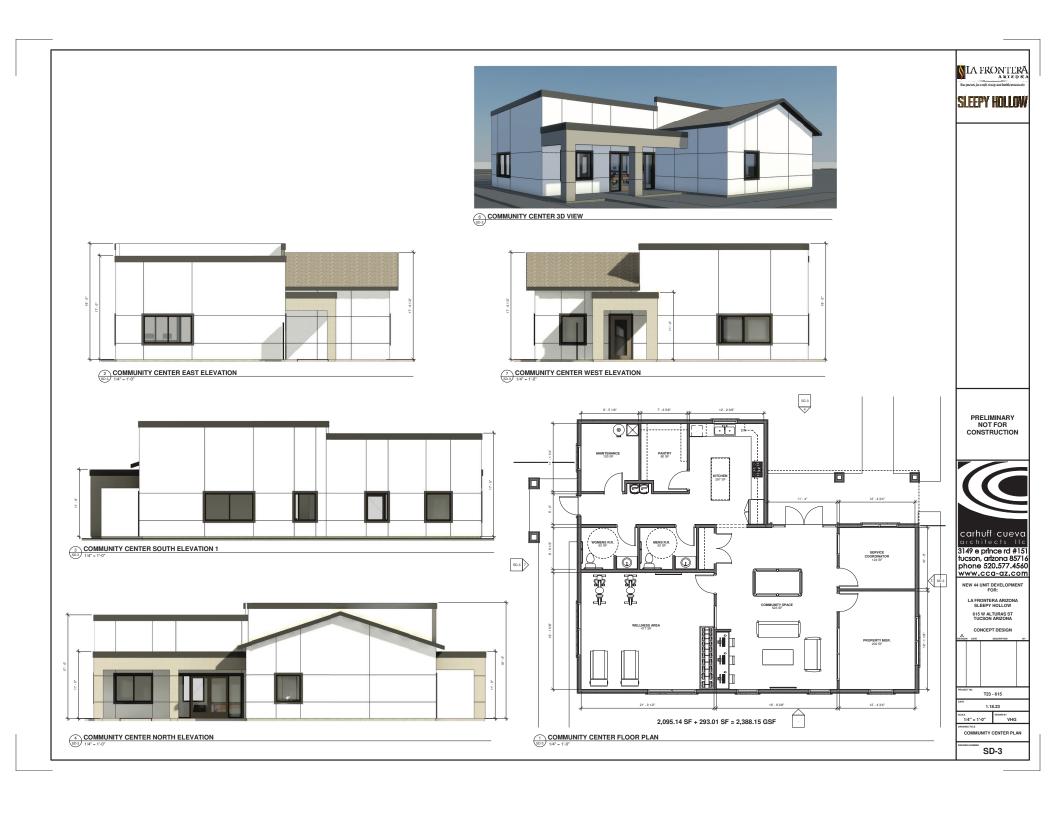
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NEW 44 UNIT DEVELOPMENT FOR: LA FRONTERA ARIZONA SLEEPY HOLLOW

615 W ALTURAS ST TUCSON ARIZONA CONCEPT DESIGN

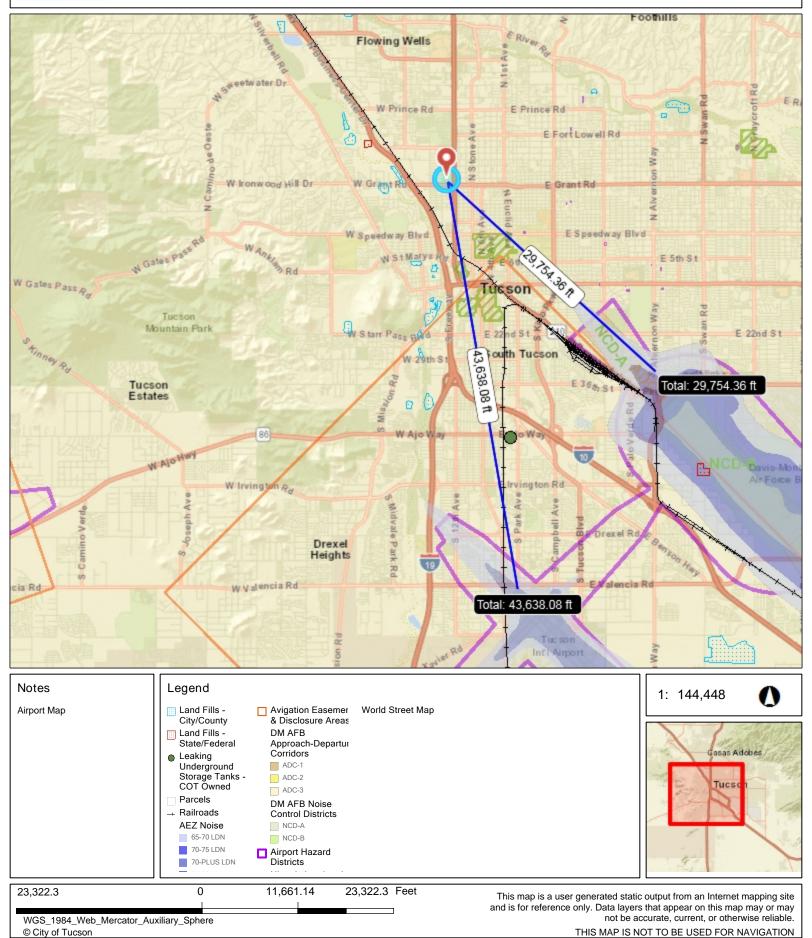
T23 - 615 1.18.23

1/4" = 1'-0" 3-BEDROOM 2-STORY DUPLEX





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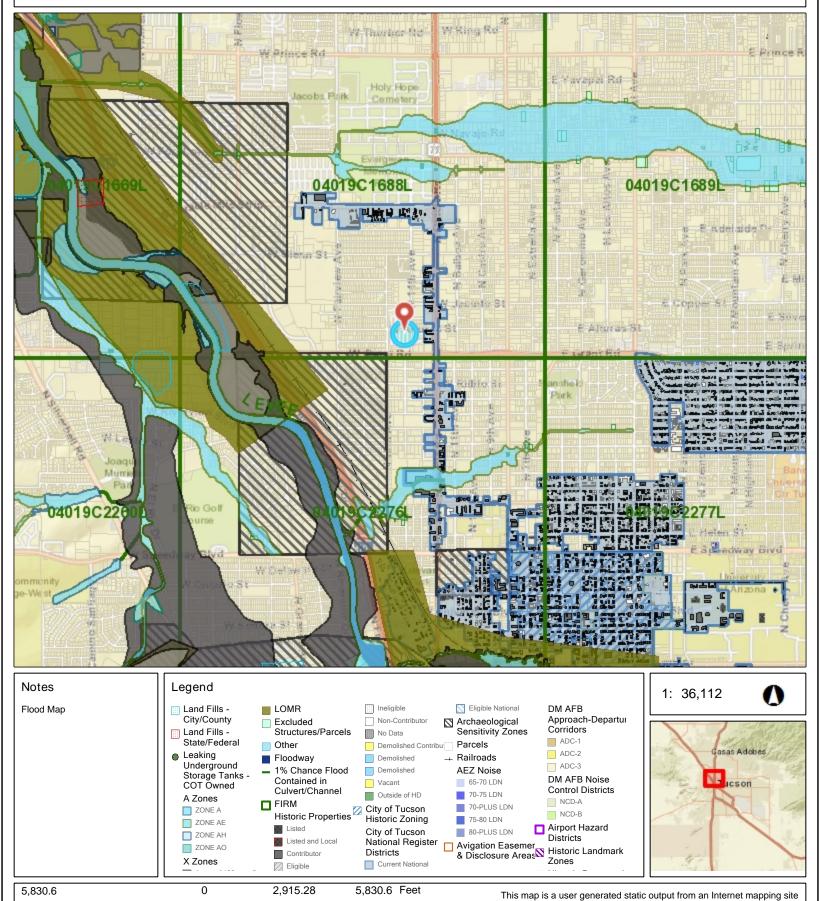




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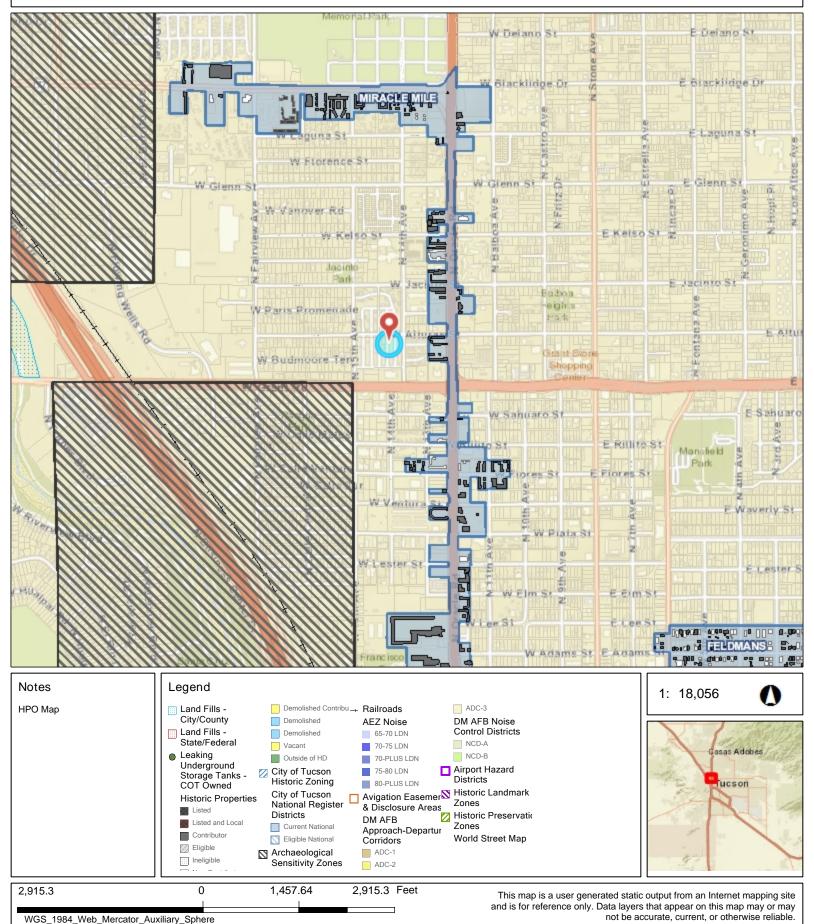
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PHASE I ENVIRONMENTAL SITE ASSESSMENT

SLEEPY HOLLOW MOBILE HOME PARK

615 West Alturas Street Tucson, Arizona WT Job No. 2982JP061

Prepared For:

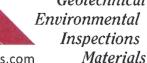
Carhuff + Cueva Architects, LLC 3149 East Prince Road, #151 Tucson, Arizona 85716

March 30, 2022

Karl D. Peterson, RG **Environmental Project Manager** Reviewed By: Jason W. Criss, EIT

Environmental Project Manager

ARIZONA • COLORADO • NEVADA • NEW MEXICO • UTAH





Technologies Inc.The Quality People

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

March 30, 2022

Carhuff + Cueva Architects, LLC 3149 East Prince Road, #151 Tucson, Arizona 85716

Re: Phase I Environmental Site Assessment

Sleepy Hollow Mobile Home Park

615 West Alturas Street Tucson, Arizona 85705 WT Job No. 2982JP061

Western Technologies Inc. presents this Phase I Environmental Site Assessment of the Sleepy Hollow Mobile Home Park at 615 West Alturas 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 development. We offer geotechnical engineering, construction materials testing & engineering, and other services.

KARL D.

Sincerely,

WESTERN TECHNOLOGIES INC.

Karl D. Peterson, RG

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 Sleepy Hollow Mobile Home Park at 615 West Alturas Street in 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 5.5 acres and rectangular in shape with asphalt-paved driveways crossing in a north-south orientation. There were approximately 141, 450-square-foot concrete slabs historically used for mobile homes throughout the Property. A 600-square-foot masonry "office" building on the north portion was used to store landscaping and maintenance equipment.

Findings

- Current Use of the Property The current use of the Property did not represent a REC.
- Use of Adjoining Properties The adjoining properties consisted of commercial and residential land uses and did not represent a REC to the Property.
- Historical Use of the Property The Property was used for a mobile home park which was developed from vacant land and did not represent a REC to the Property.
- Regulatory Agency Records Review The Property was not listed in the referenced databases.
 Sites listed within the ASTM minimum search distances were sufficiently distant and/or hydraulically down-gradient and did not represent a REC to the Property.
- The vertical and lateral extent of the Stone Avenue and Grant Road WQARF site contamination
 plume was mapped and the nearest boundary was approximately 0.1 miles to the east of the
 Property. Based on reviewed reports, this did not represent a REC to the Property.
- Based on WT's interview with the ADEQ Project Manager for the Stone Avenue and Grant Road WQARF site and the reviewed reports, vapor encroachment was not likely.

WT has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E1527-13 of the Sleepy Hollow Mobile Home Park at 615 West Alturas Street in 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.

Carhuff + Cueva Architects, LLC Phase I ESA 615 West Alturas Street Tucson, Arizona

Photographic Log WESTERN TECHNOLOGIES INC.

WT Job No.: 2982JP061 Date: March 29, 2022



Picture 1 – View from the southeast corner looking north.



Picture 2 - View from the southeast corner looking northwest.



Picture 3 - View from the southeast corner looking west.



Picture 4 - View from the northeast corner looking south.



Picture 5 - View from the northeast corner looking southwest.



Picture 6 - View from the northeast corner looking west.

Carhuff + Cueva Architects, LLC Phase I ESA 615 West Alturas Street Tucson, Arizona

Photographic Log WESTERN TECHNOLOGIES INC.

WT Job No.: 2982JP061 Date: March 29, 2022



Picture 7 - View from the northwest corner looking east.



Picture 8 - View from the northwest corner looking southeast.



Picture 9 - View from the northwest corner looking south.



Picture 10 - View from the southwest corner looking north.



Picture 11 - View from the southwest corner looking northeast.



Picture 12 - View from the southwest corner looking east.

Carhuff + Cueva Architects, LLC Phase I ESA 615 West Alturas Street Tucson, Arizona

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WT Job No.: 2982JP061 Date: March 29, 2022



Picture 13 – View of solid waste container on the east portion of the Property.



Picture 14 - View of solid waste container on the west portion of the Property.



Picture 15 – View of the "office" building at the north side of the Property.



Picture 16 – View of typical concrete slabs throughout the Property.



Picture 17 – View of landscaping and maintenance equipment stored in the "office" building.



Picture 18 – View of gasoline containers stored in the "office" building.



PHASE I ENVIRONMENTAL SITE ASSESSMENT AND SOIL ASSESSMENT

COMMERICAL PROPERTY

615 West Alturas Street Tucson, Arizona 85705 WT Reference No. 2982JP145

PREPARED FOR:

La Frontera Partners C/O Carhuff + Cueva Architects, LLC 2930 North Swan Road, Number 210 Tucson, Arizona 85712

Attn: Vance Goodman

ASTM DATES:

Reconnaissance: December 21, 2022
Records Review: December 23, 2022
Interview: January 9, 2023
Report Issuance: January 23, 2023
ASTM Viability: June 19, 2023

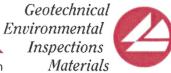
Amie L. Town

Environmental Scientist

Karl D. Peterson, R.G.

Environmental Department Manager







3480 South Dodge Boulevard (520) 748-2262 • fax 748-0435

January 23, 2023

La Frontera Partners C/O Carhuff + Cueva Architects, LLC 2930 North Swan Road, Number 210 Fort Lauderdale, Florida 33301

Attn: Vance Goodman

Re: Phase I Environmental Site Assessment

> **Commercial Property** 615 West Alturas Street

Tucson, Arizona

WT Job No. 2982JP145

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 June 19th, 2023. 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 INC.

Karl D. Peterson, R.G.

Environmental Department Manager

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EXECUTIVE SUMMARY

Western Technologies Inc. (WT) completed a Phase I Environmental Site Assessment (ESA) of the commercial property at 615 West Alturas 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. In addition, the client requested WT perform a soil vapor assessment for the Subject Property.

Subject Property – The Subject Property was approximately 5.52 acres and improved with an approximate 657 square foot office building, constructed in 1954. An in-ground swimming pool was east of the office building, and was backfilled with soil. WT sampled the soil used to backfill the swimming pool; results are discussed in Section 7.4. A 5,857 square foot recreational hall building was on the Subject Property from 1955 through 2014. The Subject Property was split into 12 rows of mobile home lots, with approximately 152 concrete foundations remaining. The Subject Property was used as a mobile home park from its first development in 1954 to 2021 and is now unoccupied. No RECs were identified in connection with the current use of the Subject Property.

Adjoining Sites – The adjoining sites consisted of residential use to the north, east, and west, and Granite Granite, a stone supplier, Lim Bong's Liquor store, and a residence to the south. The current uses of the adjoining sites do not represent a REC to the Subject Property.

Historical Use – The Subject Property was developed as a mobile home park in 1954, and remained until 2021. The Subject Property is now unoccupied.

Historical Use of Adjoining and Surrounding Area – The north, east, and west-adjoining sites have been residential since approximately 1953. The south-adjoining site was developed with a commercial building in 1953, a residential building in 1958, and an additional commercial building in 2008.

Regulatory Agency Records Review – The Subject Property was not identified in the Federal United States Environmental Protection Agency (USEPA) or the State Arizona Department of Environmental Quality (ADEQ) databases.

In the surrounding area, records were identified for the Stone Avenue and Grant Road Water Quality Assurance Revolving Fund Site (WQARF) site, six Underground Storage Tanks (USTs), 14 Leaking Underground Storage Tanks (LUSTs), 15 CERCLIS Information Data Systems (SHWS ACIDS) listings, three Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) listings, two CERCLIS No Further Remedial Action Planned (NFRAP) listings, four Assessment, Cleanup and Redevelopment Exchange System (ACRES) Brownfield (Fed Brownfields) listings, four Resource Conservation & Recovery Act Non-Generator (RCRA NON GEN) listings, eight Remediation and Designated Environmental Use Restriction (DEUR) Tracking Other Remediation Sites (RDT Other), two RCRA CORRACTS – Corrective Action (RCRA CORRACTS) listings, one RCRA Small Quantity Generator (RCRA SQG) listing, one Directory of Solid Waste Facilities (SWF/LF) listing, one Drycleaners, and two drywells listings. Based on the information disclosed in the database

La Frontera Partners WT Ref. No. 2982JP145

report and the locations of the identified sites relative to the Subject Property, the database findings do not represent a REC to the Subject Property.

Soil Vapor Assessment – Ethylbenzene exceeded the Vapor Intrusion Screening Level (VISL) Calculated Carcinogenic Risk Factor of $1x10^{-6}$. Concentrations of ethylbenzene did not exceed the "More Protective" levels calculated by the EPA Johnson & Ettinger (J&E) Model. Soil samples analyzed for Volatile Organic Compounds did not exceed laboratory reporting limits. In addition, the soil in the former swimming pool was analyzed for Polycyclic Aromatic Hydrocarbons (PAHs) and the 13 Priority Pollutants. Laboratory results indicated concentrations were below ADEQ Residential Soil Remediation Levels (SRLs).

WT has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E1527-21 of the commercial property at 615 West Alturas Street, Tucson, Arizona. Any exceptions to, or deletions from, this practice are described in Section 10 of this report.

This assessment has revealed no RECs, controlled RECs, historical RECs, vapor encroachment conditions, or significant data gaps in connection with the Subject Property.

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.

APPENDIX B – SITE PHOTOGRAPHS Phase I ESA

615 West Alturas Street, Tucson, Arizona Western Technologies Project No.: 2982JP145



1: Interior of the on-site office building



2: Interior of the on-site office building



3: Interior of the on-site office building



4: Interior of the on-site office building



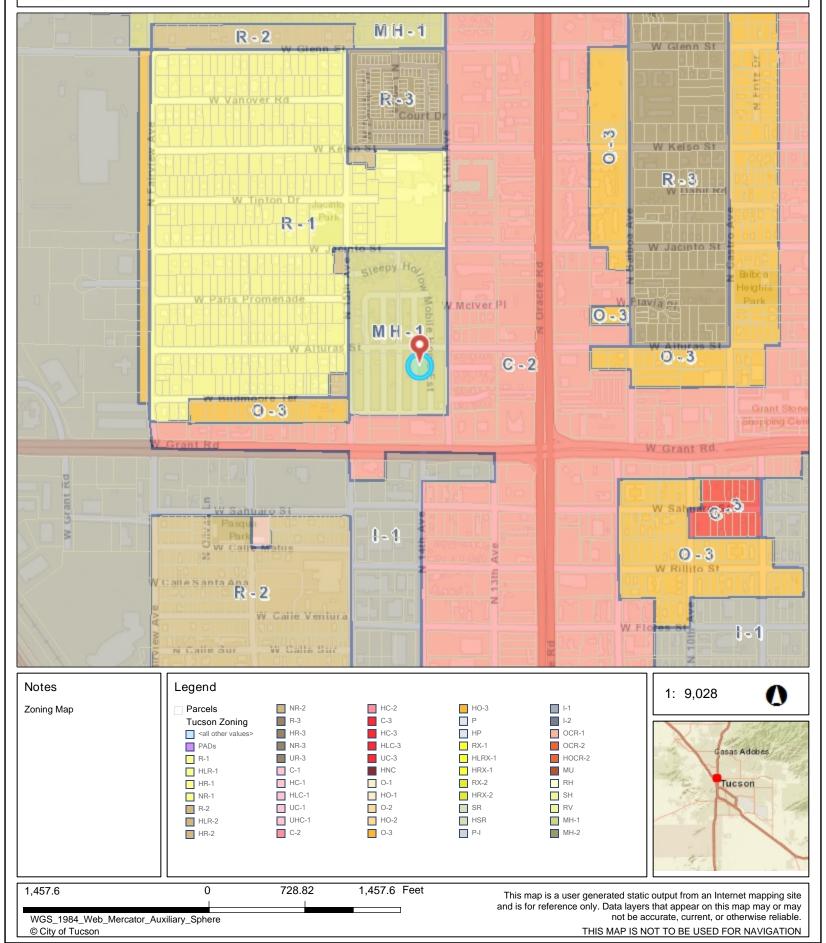
5: View of exterior concrete foundations



6: View of exterior concrete foundations



613/615 W Alturas St, 2440 N 15th Ave, Tucson, AZ 85705





EJScreen Community Report

CONANP, Esri, HERE, Garmin, Foursquare, SafeGraph GeoTechnologies, Inc., METINASA, USGS, Bureau of Lanc Management, EPA, NPS, US Census Bureau 119/104

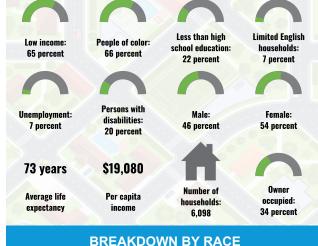
This report provides environmental and socioeconomic information for user-defined areas, and combines that data into environmental justice and supplemental indexes.

Tucson, AZ

1 mile Ring Centered at 32.251717,-110.980797
Population: 13,056
Area in square miles: 3.14

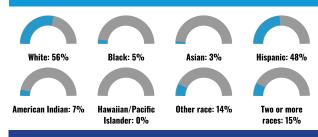
COMMUNITY INFORMATION





LANGUAGES SPOKEN AT HOME

LANGUAGE	PERCENT
English	61%
Spanish	33%
Other Indo-European	1%
Chinese (including Mandarin, Cantonese)	1%
Vietnamese	2%
Arabic	1%
Other and Unspecified	1%
Total Non-English	39%



BREAKDOWN BY AGE

From Ages 1 to 4	6%
From Ages 1 to 18	21%
From Ages 18 and up	79%
From Ages 65 and up	12%

LIMITED ENGLISH SPEAKING BREAKDOWN



Notes: Numbers may not sum to totals due to rounding. Hispanic popultion 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.

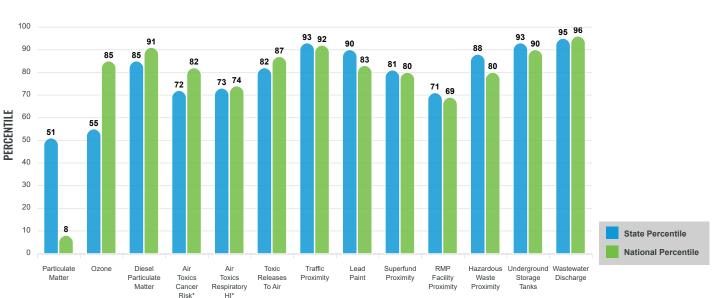
Environmental Justice & Supplemental Indexes

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.

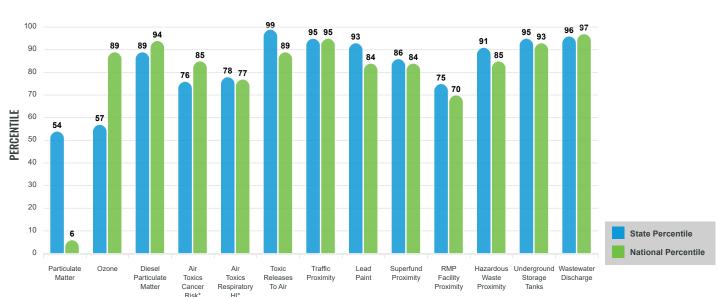
EJ INDEXES FOR THE SELECTED LOCATION



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.





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 32.251717,-110.980797

www.epa.gov/ejscreen

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EJScreen Environmental and Socioeconomic Indicators Data

SELECTED VARIABLES	VALUE	STATE AVERAGE	PERCENTILE IN STATE	USA AVERAGE	PERCENTILE IN USA
POLLUTION AND SOURCES					
Particulate Matter (µg/m³)	4.57	5.87	21	8.08	1
Ozone (ppb)	62.3	66.1	23	61.6	58
Diesel Particulate Matter (µg/m³)	0.363	0.278	65	0.261	79
Air Toxics Cancer Risk* (lifetime risk per million)	30	32	30	28	35
Air Toxics Respiratory HI*	0.3	0.31	30	0.31	31
Toxic Releases to Air	1,100	2,800	79	4,600	61
Traffic Proximity (daily traffic count/distance to road)	350	190	86	210	85
Lead Paint (% Pre-1960 Housing)	0.26	0.089	87	0.3	54
Superfund Proximity (site count/km distance)	0.059	0.077	53	0.13	49
RMP Facility Proximity (facility count/km distance)	0.12	0.38	40	0.43	35
Hazardous Waste Proximity (facility count/km distance)	0.67	0.71	73	1.9	54
Underground Storage Tanks (count/km²)	5.6	1.7	93	3.9	79
Wastewater Discharge (toxicity-weighted concentration/m distance)	1.1	5.8	83	22	92
SOCIOECONOMIC INDICATORS					
Demographic Index	65%	38%	85	35%	87
Supplemental Demographic Index	27%	14%	89	14%	91
People of Color	66%	44%	76	39%	76
Low Income	65%	32%	90	31%	91
Unemployment Rate	12%	6%	86	6%	85
Limited English Speaking Households	8%	4%	82	5%	81
Less Than High School Education	22%	12%	81	12%	83
Under Age 5	6%	5%	65	6%	65
Over Age 64	12%	20%	41	17%	33
Low Life Expectancy	27%	19%	97	20%	96

*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPAS Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the Uniter States. This effort aims to prioritize air toxics, camission 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 risk 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, when the Air Doxics 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.

Sites reporting to EPA within defined area:

Superfund	
Hazardous Waste, Treatment, Storage, and Disposal Facilities	
Water Dischargers	
Air Pollution	
Brownfields9	
Toxic Release Inventory	

Other community features within defined area:

Schools	
Hospitals 0	
Places of Worship4	

Other environmental data:

Air Non-attainment	No
Impaired Waters	No

Selected location contains American Indian Reservation Land	s* No
Selected location contains a "Justice40 (CEJST)" disadvantag	ed communityYes
Selected location contains an EPA IRA disadvantaged commu	nity N/A

Report for 1 mile Ring Centered at 32.251717,-110.980797

EJScreen Environmental and Socioeconomic Indicators Data

HEALTH INDICATORS								
INDICATOR	INDICATOR HEALTH VALUE STATE AVERAGE STATE PERCENTILE US AVERAGE US PERCENTILE							
Low Life Expectancy	27%	19%	97	20%	96			
Heart Disease	6.2	6	61	6.1	52			
Asthma	12.8	10.6	95	10	95			
Cancer	4.1	6.1	22	6.1	12			
Persons with Disabilities	18.3%	13.9%	77	13.4%	80			

CLIMATE INDICATORS							
INDICATOR	HEALTH VALUE	STATE AVERAGE STATE PERCENTILE		US AVERAGE	US PERCENTILE		
Flood Risk	1%	6%	41	12%	17		
Wildfire Risk	26%	48%	47	14%	83		

CRITICAL SERVICE GAPS							
INDICATOR	HEALTH VALUE	STATE PERCENTILE	US AVERAGE	US PERCENTILE			
Broadband Internet	26%	13%	85	14%	84		
Lack of Health Insurance	17%	10%	81	9%	88		
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 32.251717,-110.980797



2022 FFIEC Geocode Census Report

Address: 615 West Alturas Street, Tucson, Arizona, 85705

MSA: 46060 - TUCSON, AZ State: 04 - ARIZONA County: 019 - PIMA COUNTY

Tract Code: 0013.03

Summary Census Demographic Information

Carrinary Concae Demographic information	
Tract Income Level	Moderate
Underserved or Distressed Tract	No
2022 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	\$81,100
2022 Estimated Tract Median Family Income	\$56,008
2020 Tract Median Family Income	\$47,976
Tract Median Family Income %	69.06
Tract Population	2925
Tract Minority %	70.12
Tract Minority Population	2051
Owner-Occupied Units	518
1- to 4- Family Units	898

Census Income Information

Tract Income Level	Moderate
2020 MSA/MD/statewide non-MSA/MD Median Family Income	\$69,466
2022 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	\$81,100
% below Poverty Line	27.70
Tract Median Family Income %	69.06
2020 Tract Median Family Income	\$47,976
2022 Estimated Tract Median Family Income	\$56,008
2020 Tract Median Household Income	\$23,690

Census Population Information

Tract Population	2925
Tract Minority %	70.12
Number of Families	536
Number of Households	1420
Non-Hispanic White Population	874
Tract Minority Population	2051
American Indian Population	108
Asian/Hawaiian/Pacific Islander Population	87
Black Population	135
Hispanic Population	1638
Other/Two or More Races Population	83

Census Housing Information

Conduct reading information	
Total Housing Units	1660
1- to 4- Family Units	898
Median House Age (Years)	43
Owner-Occupied Units	518
Renter Occupied Units	902
Owner Occupied 1- to 4- Family Units	499
Inside Principal City?	YES
Vacant Units	240