# NOTICE OF FINDING OF NO SIGNFICANT IMPACT AND

# NOTICE OF INTENT TO REQUEST RELEASE OF FUNDS

## May 3, 2021

City of Saint Paul

1100 City Hall Annex

25 West Fourth Street

Saint Paul, MN 55102

(651) 266-6655

**These notices shall satisfy two separate but related procedural requirements for activities to be undertaken by the City of Saint Paul.**

# REQUEST FOR RELEASE OF FUNDS

On or about May 18, 2021, the City of Saint Paul will submit a request to the U.S. Department of Housing and Urban Development (HUD) for the release of Community Development Block Grant (CDBG) funds, as authorized by Title 1 of the Housing and Community Development Act of 1974, Public Law 93-383, as amended 42 U.S.C. § 5301 *et seq*., to undertake the following projects:

**Tier 1 Broad Level Review**: The following activities are Categorically Excluded Subject to §58.5 (CEST) or Environmental Assessment: Known laws and authorities regardless of the site location are addressed at the Tier I Broad Level Review. **Tier 2 Site Specific Review:** Site specific reviews will be completed for those laws and authorities not addressed in the Tier 1 broad review for each address under these programs when addresses become known. The Tier 2 site specific reviews will assess compliance with the following Statutes, Executive Orders and Regulations listed at 24 CFR §58.5.

**Tier 1 Broad Level Review**: **East Side Revolving Loan Fund/$300,000 (FY’21) $1,200,000 (FY’22-FY’25)/** The East Side Revolving Loan Fund (East Side RLF) provides a wide range of technical, financial, and counseling services to enable low- and very low-income homeowners to rehabilitate their homes. Services include property inspections, preparing work specifications, construction management, determining loan applicant’s income eligibility, financial counseling, loan processing, and the provision of below market interest rate and deferred loans.

**Location:** The service area is everything approximately between Mississippi Street and Interstate 35E to Clarence Street/Ames Avenue and almost to White Bear Avenue to the east, and between Warner Road and to Wheelock Parkway East to the north.

**Level of Environment Review Determination:**

Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at §58.5:

58.35(a)(2)

**Tier II Site Specific Review:** *The following are the laws and authorities that will be assessed during the site specific review.* Airport Hazards, Flood Insurance, Contamination and Toxic Substances, Floodplain Management, Historic Preservation, Noise Abatement and Control, Wetlands Protection, Environmental Justice.

**Tier 1 Broad Level Review**: **East Side Home Ownership/$100,000 (FY’21) $400,000 (FY’22-FY’25)/** The East Side Home Ownership program will assist with the construction of new single-family houses on vacant lots, located in saint Paul’s East Side neighborhoods, and sell them to households with incomes at or below 80% of AMI. The houses will have at least 3 bedrooms and 2 stall detached garages.

**Location:** The service area covers Districts 1, 2, 4, 5 and parts of Districts 6 and 10, and Wards 5, 6, and 7.

Level of Environment Review Determination:

Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at §58.5: 58.35(a)(2), 58.35(a)(3), 58.35(a)(4), 58.35(a)(5)

**Tier II Site Specific Review:** *The following are the laws and authorities that will be assessed during the site specific review.*Airport Hazards, Flood Insurance, Contamination and Toxic Substances, Endangered Species, Explosive and Flammable Hazards, Floodplain Management, Historic Preservation, Noise Abatement and Control, Wetlands Protection, Environmental Justice.

**Tier 1 Broad Level Review**: **North End Revitalization Fund/$125,000 (FY’21) $500,000 (FY’22-FY’25)/** North End Revitalization Fund provides home improvement loans and accompanying construction management services to help low- to moderate-income homeowners make health and safety repairs and rehabilitation to their single-family homes in the North End and South Como neighborhoods in St. Paul.

**Location:** The service area includes the North End and South Como (District 6) and then southern corner of district 10: Dale on the East, Lexington on the West, Maryland Ave/Como on the North, and Railroad north of Pierce Butler Route.

**Level of Environment Review Determination:** Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at §58.5:58.35(a)(2)**,** 58.35(a)(3)

**Tier II Site Specific Review:** *The following are the laws and authorities that will be assessed during the site specific review.*Airport Hazards, Flood Insurance, Contamination and Toxic Substances, Floodplain Management, Historic Preservation, Noise Abatement and Control, Wetlands Protection, Environmental Justice.

**Tier 1 Broad Level Review**: **Saint Paul Green Line Home Improvement Loan Program/$125,000 (FY’21)/** The Greenline Home Improvement Program provides home improvement grants and loans and accompanying construction management services to help low-to moderate-income homeowners make health and safety repairs and rehabilitation to their single family homes in the core St. Paul neighborhoods along University Avenue and the Greenline corridor in St. Paul.

**Location:** The service area covers District 7, 8, 11, and 13, and Wards 1, 4, and 5, or approximately from Grand Ave to the city limits to the north and from about Payne Ave to the city limits on the west.

**Level of Environment Review Determination:** Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at §58.5:58.35(a)(2)**,** 58.35(a)(3)

**Tier II Site Specific Review:** *The following are the laws and authorities that will be assessed during the site specific review.*Airport Hazards, Flood Insurance, Contamination and Toxic Substances, Floodplain Management, Historic Preservation, Noise Abatement and Control, Wetlands Protection, Environmental Justice.

**Tier 1 Broad Level Review**: **St. Paul Home Improvement Loan Fund/$125,000 (FY’21)/** The St. Paul Home Improvement Loan Fund provides home improvement loans and construction management services to help low-to-moderate income homeowners make health and safety repairs and rehabilitation to their owner occupied homes throughout the City of St. Paul with a focus on underrepresented neighborhoods and overall city-wide coverage and support.

**Location:** Citywide

**Level of Environment Review Determination:** Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at §58.5:58.35(a)(3)**,** 58.35(a)(4)**,** 58.35(a)(6)

**Tier II Site Specific Review:** *The following are the laws and authorities that will be assessed during the site specific review.* Airport Hazards, Flood Insurance, Contamination and Toxic Substances, Floodplain Management, Historic Preservation, Noise Abatement and Control, Wetlands Protection, Environmental Justice.

**Tier 1 Broad Level Review**: **Deferred Citywide Homeowner Improvement Loan Fund/$844,000 (FY’21) $4,000,000 (FY’22-FY’25)/** The funds in this program are used to assist low income households to rehabilitate their homes by addressing CDBG eligible uses: (i.e. building code enforcement, lead paint abatement, hazardous waste treatment, handicap accessibility, energy improvements and window, roof and siding replacement, etc.). Funds are also used for emergency repair of water/sewer lines, deficient furnaces, and broken water heaters.

**Location:** Citywide

**Level of Environment Review Determination:** Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at §58.5:58.35(a)(2)**,** 58.35(a)(3)**,** 58.35(a)(6)

**Tier II Site Specific Review:** *The following are the laws and authorities that will be assessed during the site specific review.*Airport Hazards, Flood Insurance, Contamination and Toxic Substances, Floodplain Management, Historic Preservation, Noise Abatement and Control, Wetlands Protection, Environmental Justice.

**Tier 1 Broad Level Review**: **Housing Real Estate Fund/$450,000 (FY’21) $3,400,000 (FY’22-FY’25)/** The Housing Real Estate Fund assists in financing the preservation, rehabilitation, or new construction of affordable housing. Implement CDBG eligible activities related to acquisition and related costs (e.g. relocation, demolition, site preparation, and adjacent public improvements), rehabilitation, new construction, and related costs that are part of the total development cost of a housing project.

**Location:** Citywide

**Level of Environment Review Determination:** Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at §58.5:58.35(a)(1)**,** 58.35(a)(2)**,** 58.35(a)(3)**,** 58.35(a)(4)**,** 58.35(a)(5)**,** 58.35(a)(6)

**Tier II Site Specific Review:** *The following are the laws and authorities that will be assessed during the site specific review.*Airport Hazards, Flood Insurance, Air Quality, Contamination and Toxic Substances, Endangered Species, Explosive and Flammable Hazards, Floodplain Management, Historic Preservation, Noise Abatement and Control, Wetlands Protection, Environmental Justice.

**Tier 1 Broad Level Review**: **Acquisition Fund/$250,000 (FY’21)/** Funds to be utilized by the City of Saint Paul Housing and Redevelopment Authority (HRA) to acquire vacant, underutilized properties, and pay for related demolition and/or relocation costs of strategic, hazardous and/or blighted properties for reuse as determined by input and support from the applicable recognized community organizations representing the neighborhood in which the property is located.

**Location:** Citywide

**Level of Environment Review Determination:** Environmental Assessment per 24 CFR 58.35

**Tier II Site Specific Review:** *The following are the laws and authorities that will be assessed during the site specific review.* Airport Hazards, Flood Insurance, Air Quality, Contamination and Toxic Substances, Endangered Species, Explosive and Flammable Hazards, Floodplain Management, Historic Preservation, Noise Abatement and Control, Wetlands Protection, Environmental Justice.

**Tier 1 Broad Level Review**: **Acquisition and Rehabilitation Revolving Loan/$100,000 (FY’21)/** The program will involve the purchase of small, dilapidated rental properties, and restoring them to single family homes to re-sell to potential homeowners at or below 80% of median income to promote home ownership and stabilization of neighborhoods.

**Location:** The approximate service area is Ward 2 and includes all or part of the following District 3, 4, 5, 8, 9, 16, and 17.

**Level of Environment Review Determination:** Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at §58.5: 58.35(a)(1), 58.35(a)(3), 58.35(a)(5), 58.35(a)(6)

**Tier II Site Specific Review:** *The following are the laws and authorities that will be assessed during the site specific review.* Airport Hazards, Flood Insurance, Contamination and Toxic Substances, Endangered Species, Explosive and Flammable Hazards, Floodplain Management, Historic Preservation, Noise Abatement and Control, Wetlands Protection, Environmental Justice.

**Tier 1 Broad Level Review**: **West Side Commercial/$100,000 (FY’21)/** The West Side Commercial program, will provide Deferred/Forgivable Loans to property/business owners for the rehabilitation of commercial storefronts and to make code related repairs. Financial and technical assistance will be provided to property owners seeking to improve their commercial building that will in turn increase the viability of the City of Saint Paul’s commercial districts.

**Location:** The program service area is within the West Side Community District and is within the City of Saint Paul limits south of the Mississippi River.

**Level of Environment Review Determination**: Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at §58.5: 58.35(a)(3)

**Tier II Site Specific Review:** *The following are the laws and authorities that will be assessed during the site specific review.*Airport Hazards, Flood Insurance, Contamination and Toxic Substances, Endangered Species, Floodplain Management, Historic Preservation, Wetlands Protection, Environmental Justice.

**Tier 1 Broad Level Review**: **Economic Development Loan Leverage Fund (EDLLF)/$50,000 (FY’21)/** Economic Development Loan Leverage Fund is the community development organization in Districts 1 and 2 and provides commercial loans to District 4. The program will continue support of businesses with loans and grants to either acquire or improve properties through rehabilitation in the target area.

**Location:** The program service area the eastern part of Saint Paul and includes District 1, 2, 4, and 5, and Wards 6 and 7, which is approximately everything to the east starting from the Mississippi River at the southeast corner of the city north to where it meets Highway 52 and continuing north along Westminster Street.

**Level of Environment Review Determination:** Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at §58.5:58.35(a)(1)**,** 58.35(a)(2)**,** 58.35(a)(3)**,** 58.35(a)(6)

**Tier II Site Specific Review:** *The following are the laws and authorities that will be assessed during the site specific review.* Airport Hazards, Flood Insurance, Contamination and Toxic Substances, Endangered Species, Floodplain Management, Historic Preservation, Wetlands Protection, Environmental Justice

**Tier 1 Broad Level Review**: **North End Façade Improvement (NEFIP)/$45,000 (FY’21)/** The North End Façade Improvement is a deferred loans program supporting property owners with rehabilitation of commercial storefronts within the boundaries of the North End of the City of St. Paul (District 6).

**Location:** The approximate service are is between Western Avenue on the west and Interstate Highway 35E on the east and from Train Tracks on the south and to the city limit on the north, and includes all of Ward 5.

**Level of Environment Review Determination:** Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at §58.5:58.35(a)(2)**,** 58.35(a)(3)**,** 58.35(a)(6)

**Tier II Site Specific Review:** *The following are the laws and authorities that will be assessed during the site specific review.* Airport Hazards, Flood Insurance, Contamination and Toxic Substances, Floodplain Management, Historic Preservation, Wetlands Protection, Environmental Justice.

**Tier 1 Broad Level Review**: **East Side Business Investment Fund (BIF)/$180,000 (FY’21)/** The East Side Business Investment Fund will provide financing to remediate and rehabilitate the existing buildings for highest and best use and attract new commercial development resulting in jobs for area residents along the Payne-Arcade Commercial District.

**Location:** The approximate service are is between Edgerton Street on the west and Arcade Street on the east and from 6th Street on the south to just before Wheelocke Parkway on the north, and includes District 5 and Ward 6.

**Level of Environment Review Determination:** Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at §58.5:58.35(a)(2)**,** 58.35(a)(3)**,** 58.35(a)(6)

**Tier II Site Specific Review:** *The following are the laws and authorities that will be assessed during the site specific review.*Airport Hazards, Flood Insurance, Contamination and Toxic Substances, Floodplain Management, Historic Preservation, Wetlands Protection, Environmental Justice.

**Tier 1 Broad Level Review**: **Commercial Node Citywide Economic Development/$75,000 (FY’21)/** The Commercial Node Citywide Economic Development Program will provide financing to assist businesses with expansion, property acquisition, rehabilitation, and energy conservation improvements.

**Location:** Citywide

**Level of Environment Review Determination:** Environmental Assessment per 24 CFR 58.35

**Tier II Site Specific Review:** *The following are the laws and authorities that will be assessed during the site specific review.*Airport Hazards, Flood Insurance, Air Quality, Contamination and Toxic Substances, Endangered Species, Explosive and Flammable Hazards, Floodplain Management, Historic Preservation, Wetlands Protection, Environmental Justice.

**Tier 1 Broad Level Review**: **Restore St. Paul/$125,000 (FY’21)/** The Restore Saint Paul is a commercial facade improvement program that provides financing, technical assistance, and project management to help business and property owners undertake historically appropriate storefront improvement and rehabilitation projects. It is available in several of the city’s oldest, low-moderate income neighborhoods. Financing may include forgivable, deferred, and amortizing low-interest loans and an owner match as appropriate.

**Location:** Citywide

**Level of Environment Review Determination:** Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at §58.5:58.35(a)(2)**,** 58.35(a)(3)**,** 58.35(a)(6)

**Tier II Site Specific Review:** *The following are the laws and authorities that will be assessed during the site specific review.*Airport Hazards, Flood Insurance, Contamination and Toxic Substances, Floodplain Management, Historic Preservation, Wetlands Protection, Environmental Justice.

**Tier 1 Broad Level Review**: **Rondo Community Land Trust/$180,000 (FY’21)/** Homeownership initiative that will involve acquiring property to build new housing and rehabilitate existing housing in St. Paul for subsequent resale. The housing will be made affordable and kept affordable for future generations by placing it in the land trust.

**Location:** Citywide

**Level of Environment Review Determination:** Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at §58.5:58.35(a)(1), 58.35(a)(2)**,** 58.35(a)(3), 58.35(a)(4), 58.35(a)(5), 58.35(a)(6)

**Tier II Site Specific Review:** *The following are the laws and authorities that will be assessed during the site specific review.* Airport Hazards, Flood Insurance, Air Quality, Contamination and Toxic Substances, Endangered Species, Explosive and Flammable Hazards, Floodplain Management, Historic Preservation, Noise Abatement and Control, Wetlands Protection, Environmental Justice.

# FINDING OF NO SIGNIFICANT IMPACT

### The City of Saint Paul has determined that the projects are either exempt pursuant to HUD regulation 24 CFR §85.34 or are categorically excluded under HUD regulations at 24 CFR Part 58 from National Environmental Policy Act (NEPA) requirements per the specific regulations cited above. An Environmental Review Record (ERR) that documents the environmental determinations for these projects is on file at the City of Saint Paul and will be made available for review either electronically or by U.S. mail. Please submit your request by U.S. mail to Addison Vang, 1400 City Hall Annex, 25 West 4th Street, Saint Paul, MN 55102 or by email to Addison.Vang@ci.stpaul.mn.us. The ERR can also be accessed online at the following websites: <https://www.hudexchange.info/programs/environmental-review/environmental-review-records/> and <https://www.stpaul.gov/departments/planning-economic-development/consolidated-plan>.

# PUBLIC COMMENTS

Any individual, group, or agency may submit written comments on the ERR to the City of Saint Paul, Department of Planning and Economic Development, Grants Management. Please submit comments to the City of Saint Paul by U.S. Mail to Julie Hostak, Grants Specialist, 1100 City Hall Annex, 25 West 4th Street, Saint Paul, MN 55102 or by email to [Julie.Hostak@ci.stpaul.mn.us](mailto:Julie.Hostak@ci.stpaul.mn.us). All comments received **by May 18, 2021**, will be considered by the City of Saint Paul. If after the 15-day comment period ends, no comments are received or all comments received have been resolved, HUD may issue the Authority to Use Grant Funds authorizing the release of funds. Comments should specify which Notice they are addressing.

# ENVIRONMENTAL CERTIFICATION

The City of Saint Paul certifies to HUD that Melvin Carter III in his capacity as Mayor consents to accept the jurisdiction of the Federal Courts if an action is brought to enforce responsibilities in relation to the environmental review process and that these responsibilities have been satisfied. HUD’s approval of the certification satisfies its responsibilities under NEPA and related laws and authorities and allows the City of Saint Paul to use Program funds.

# OBJECTIONS TO RELEASE OF FUNDS

## HUD will accept objections to its release of fund and the City of Saint Paul’s certification for a period of fifteen days following the anticipated submission date or HUD’s actual receipt of the request (whichever is later) only if they are on one of the following bases: (a) the certification was not executed by the Certifying Officer of the City of Saint Paul; (b) the City of Saint Paul has omitted a step or failed to make a decision or finding required by HUD regulations at 24 CFR part 58; (c) the grant recipient or other participants in the development process have committed funds, incurred costs or undertaken activities not authorized by 24 CFR Part 58 before approval of a release of funds by HUD; or (d) another Federal agency acting pursuant to 40 CFR Part 1504 has submitted a written finding that the project is unsatisfactory from the standpoint of environmental quality. Objections must be prepared and submitted via email in accordance with the required procedures (24 CFR Part 58, Sec. 58.76) and shall be addressed to the Minnesota Office of the Department of Housing and Urban Development (HUD), Community Planning and Development (CPD) via email at CPD\_COVID-19OEE-MIN@hud.gov. Potential objectors should contact HUD via email to verify the actual last day of the objection period.

## Melvin Carter III, Mayor

City of Saint Paul

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15 West Kellogg Blvd

Saint Paul, MN 55102