

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

Project Information

Project Name: The-Playwrights'-Center-New-Home

HEROS Number: 900000010329856

Responsible Entity (RE): ST. PAUL, DEPARTMENT OF PED ST. PAUL MN, 55102

RE Preparer: Victor White

State / Local Identifier:

Certifying Officer: Luis Pereira

Grant Recipient (if different than Responsible Entity):

Point of Contact:

Consultant (if applicable):

Point of Contact:

Project Location: 710 Raymond Ave, Saint Paul, MN 55114

Additional Location Information:
N/A

Direct Comments to: Please direct comments to Victor White at
victor.white@ci.stpaul.mn.us or by U.S. mail to Victor White,

1400 City Hall Annex, 25 West 4th Street, Saint Paul, MN
55102

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

The Playwright's Center project includes the acquisition, limited demolition, and reconstruction of a 19,500 SF warehouse building. The project is part of the "Creative Enterprise Zone", a growing St Paul district focused on creativity and innovation. The existing building consists of a series of connected additions constructed between 1913 and 1994, most recently used as an office/warehouse. The renovated facility will provide Playwrights' Center with the space needed to effectively support their staff, artists, and programming and includes an office, a rehearsal space for workshopping plays, and a presentation space for presenting readings to the public. The renovation includes the replacement of all building HVAC and electrical components with energy-efficient systems, a new roof, and membrane on all flat-roofed portions of the building, universally designed sidewalks, and landscaping to replace existing impervious surfaces, an accessible storefront entry and lobby, a new elevator, and new and renovated fire suppression systems. Building exteriors will be patched, repaired, or resurfaced.

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

The statutory authority to operate the Playwrights' Center for this project is governed by Minnesota Statute 16A.695 Subdivision 2 which allows for public entities to enter into lease agreements with nonprofits to carry out a public purpose for bond allocations. This project is similar to the Victoria Theater project which was funded in the bonding bill passed October 2020 which gave statutory authority for the City of St. Paul to operate the project and program. Like the Victoria Theater, the new Playwrights' Center is a cultural arts project that lifts up the voices of BIPOC artists and playwrights and supports them throughout their artmaking process. This project is to support the Playwrights' Center's mission to "sustain, develop, and advocate for playwrights and their work to realize their full artistic potential." The project has the power to support the changing face and voice of American theater. This theater development complex situated in the heart of St. Paul's Creative Enterprise Zone, will meet the exponentially increasing need to serve our homegrown playwrights and audiences, as well as national and international students, freelancers, and writers.

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

Currently the site is vacant, and redevelopment of the site is dependent on this undertaking.

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

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:

[The Playwrights Center New Home - ERR Signature Page - signed.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
B-23-CP-MN-0865	Community Planning and Development (CPD)	Community Project Funding (CPF) Grants

**Estimated Total HUD Funded, \$4,000,000.00
Assisted or Insured Amount:**

**Estimated Total Project Cost [24 CFR 58.2 (a) \$19,033,900.00
(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 Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Using our GIS software, we were able to determine that the project site, 710 Raymond Ave, is not within 2,500 feet of either civilian airport in the Twin Cities. In addition, there are no military

		airports within 15,000 feet of the project site. The project is compliant with HUD's Airport Hazards policy.
Coastal Barrier Resources Act Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	We utilized the U.S. Fish and Wildlife Service's "Coastal Barrier Resources System Mapper" GIS application to determine whether the project site falls into a CBRS. According to the USFWS, the only CBRS found in Minnesota is the "John H. Chafee CBRS" in Duluth, Minnesota. Since the proposed HUD project is in the city of Saint Paul, Minnesota, approximately 160 miles south of the "John H. Chafee CBRS", it can be determined that there will be no effect. Therefore, this project is compliant with the Coastal Barrier Resources Act.
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	According to the map generated by FEMA's National Flood Hazard Layer (NFHL) GIS application, it was determined that the project site is in FEMA FIRMette Map Panel Number: 27123C0080G. This panel has been in effect since 6/4/2010 and is labeled as "Zone X (Unshaded)". Since the proposed HUD-Assisted project occurs in an unshaded "Zone X" area, it can be determined that 710 Raymond Ave is neither in a Special Flood Hazard Area (SFHA) or an area of Moderate Risk. Flood insurance will serve no purpose, nor will it be necessary to serve as mitigation. Therefore, the project is compliant with Flood Insurance requirements.
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5		
Air Quality Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project's county or air quality management district is in attainment status for all criteria pollutants. The project is in compliance with the Clean Air Act.
Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	In the state of Minnesota, the only coastal zone that is protected by the Coastal Zone Management Act (CZMA)

		is along the coast of Lake Superior. The project occurs in the City of Saint Paul and the proposed project site, 710 Raymond Ave, is approximately 130 miles away from coastal areas protected in the Minnesota Department of Natural Resources coastal management plan. Therefore, the project is compliant with the Coastal Zone Management Act.
Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>The following is a timeline that represents how the facility was assessed for on-site contamination... On September 18th, 2018 -WENCK Associates performed a Phase I ESA and found no Recognized Environmental Conditions (RECs), Controlled Recognized Environmental Conditions (CRECs), or Historical Recognized Environmental Conditions (HRECs). However, there were several facilities in close proximity to the site that were associated with releases of petroleum and/or other solvents which WENCK considered an REC for the subject property 710 Raymond Ave. On October 29th, 2018 -WENCK Associates performed a Phase II ESA. WENCK then listed the following conclusions... -That the Subject Property should be enrolled in the MPCA Voluntary Brownfields Program -Apply for a No Association Determination and No Action Determination related to the site testing -If the Subject property is to be redeveloped, a Response Action Plan and/or Construction Contingency Plan may be required by the MPCA depending on the development plans and the proposed future use On November 16th, 2018 -WENCK wrote a letter to the MPCA requesting a No Association Determination and No Action Determination On January 7th, 2019 -The MPCA issued the No Association Determination On May 22nd, 2019 -The MPCA determined</p>

		<p>that the subject property did not require a vapor intrusion mitigation system at this time -The MPCA recommended that future construction activities at the site within the footprint of the proposed construction area be preceded by a soil vapor investigation. As a result of the MPCA's recommendations, the developer will draft and implement a Response Action Plan and/or Construction Contingency Plan under MPCA approval to manage any environmental conditions encountered prior to and during construction. The proposed addition will include a passive mitigation system, which could become active if there were soil vapor intrusion problems identified. In addition, we visited the EPA's "NEPAssist" and Minnesota Pollution Control Agency's (MPCA) "What's in My Neighborhood" (WIMN) GIS web applications to identify sources of contamination within 1/2 mile of the proposed HUD-assisted project site. On NEPAssist, there were no Superfund sites in the immediate vicinity (2 to 4 Blocks) or within 1/2 mile of 710 Raymond Ave. There were two Brownfield sites in the immediate vicinity (2 to 4 Blocks) and 1 Brownfield site within 1/2 mile of the proposed project site. As evidence of due diligence, these sites will be listed below and the NEPAssist Report will be uploaded to HEROS. Site 1: 750 Pelham Blvd, Saint Paul, MN 55114 -The EPA's Cleanups in My Community Page (CIMC) lacked sufficient information to determine compliance. However, the MPCA indicated that site work initially concluded in 2000. The site was subject to a vapor reassessment in 2019 which concluded 6/30/2019. No further action required. Site 2: 721 Raymond Ave/2391 Myrtle St, Saint Paul, MN</p>
--	--	--

		<p>55114 (City Sounds) -According to the EPA's CIMC page, extensive site work took place. Various environmental site investigations found Arsenic, Asbestos, Cadmium, Chromium, Copper, Lead, Nickel, other metals, PAHS, Petroleum products, SVOCs, and VOCs. These contaminants have been brought to acceptable levels in relevant media and as a result, the site is ready for its anticipated use and redevelopment is underway. No further action required. Site 3: 2108 University Ave, Saint Paul, MN 55114 -The EPA's Cleanups in My Community Page (CIMC) lacked sufficient information to determine compliance. However, the MPCA indicated that site investigation closed 1/6/2015, indicating that contamination has been remediated. No further action required. The project is compliant with Contamination and Toxic Substances requirements.</p>
<p>Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The following species were identified in the IPaC species list generated on June 27th, 2023: Northern Long-eared Bat, Tricolored Bat, Higgins Eye (pearlymussel), Snuffbox Mussel, Winged Mapleleaf (mussel), Rusty Patched Bumble Bee, and Monarch Butterfly. Project activities will have no effect on the Northern Long-eared Bat. This determination can be made because project activities do not involve clearing or disturbing suitable habitat, no activity in or near the entrance to cave or mine, nor mining, deep excavation, or underground work within 0.25 miles of a cave or mine, nor construction of wind turbines or demolition or reconstruction of human made structures known to be used by bats. Project activities will have no effect on the Tricolored Bat. This determination can be made because project activities do not involve clearing</p>

		<p>or disturbing suitable habitat, no activity in or near the entrance to cave or mine, nor mining, deep excavation, or underground work within 0.25 miles of a cave or mine, nor construction of wind turbines or demolition or reconstruction of human made structures known to be used by bats. Project activities will have no effect on the Higgins Eye (pearly mussel). This determination can be made because project activities do not involve habitat loss, degradation, or introduction of exotic species including Zebra mussels, which are the major threats to the survival of the Higgins eye mussel. Project activities will have no effect on the Snuffbox Mussel. This determination can be made because project activities do not involve the construction of dams, sedimentation, introduction of pollutants, channelization, or the introduction of exotic species including Zebra mussels. Project activities will have no effect on the Winged Mapleleaf (mussel). This determination can be made because project activities do not involve the construction of dams, sedimentation, introduction of pollutants, channelization, or the introduction of exotic species including Zebra mussels. Project activities will have no effect on the Rusty Patched Bumble Bee. This determination can be made because project activities do not involve habitat loss, degradation, or introduction of pathogens or exposure to insecticides or fungicides, which are suspected to be the major threats to the species along with non-native and managed bees, the effects of climate change, and small population biology. The Monarch Butterfly is a candidate species and not yet listed or proposed for listing. There are currently no section 7 requirements for candidate species. Project activities</p>
--	--	--

		will not impact known habitat. Project activities do not involve construction of Communication Towers (radio, television, cellular, and microwave towers), Transmission Lines (power lines or poles, particularly those with uninsulated or unguarded electrical currents), or Wind Turbines. Therefore, there will be no effect on migratory birds. In addition, there are no critical habitats for the listed species within the project area under the USFWS jurisdiction. The project site is in a fully urbanized area and there is no habitat present in the project site for the species on the IPaC list. The proposed project activities will not jeopardize the continued existence of any listed species. Therefore, the project is compliant with Section 7 requirements.
Explosive and Flammable Hazards Above-Ground Tanks)[24 CFR Part 51 Subpart C	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Based on the project description, no further evaluation is required. The project does not involve rehabilitation or modernization that will result in residential densities being increased or the conversion of a building use to another that results in residential habitation. The project is compliant with Explosive and Flammable Hazard requirements.
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is compliant with the Farmland Protection Policy Act.
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	According to the FIRMet map, generated using FEMA's GIS web application, the proposed HUD project site was found in FIRMet Map Panel Number: 27123C0080G. This panel has been in effect since 6/4/2010 and indicates that the address, 710 Raymond Ave, is not located on a floodplain. Therefore, the project is compliant with Executive Order 11988.

Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>The City of Saint Paul initiated consultation with the Minnesota State Preservation Office (SHPO) and the appropriate Tribal Historic Preservation Offices (THPOs) to ensure Section 106 Compliance with the proposed undertaking. The proposed HUD-assisted project received a memo from the Minnesota State Historic Preservation Office (MN SHPO). In this memo, it was concluded that proposed activity would have "no adverse effect" on the University-Raymond Historic District. The following summarizes the consultation and public involvement portion of determining Section 106 compliance. "On May 2, 2023, City of Saint Paul HP Staff notified the following Tribal Nations about the undertaking, pursuant to 36 CFR 800 and Minn. Stat. 10.65: Lower Sioux Indian Community in the State of Minnesota, Apache Tribe of Oklahoma, Cheyenne and Arapaho Tribes, Oklahoma, Iowa Tribe of Kansas and Nebraska, Prairie Island Indian Community in the State of Minnesota, Santee Sioux Nation, Nebraska, Fort Belknap Reservation of Montana, Menominee Indian Tribe of Wisconsin, Flandreau Santee Sioux Tribe of South Dakota, and the Upper Sioux Community, Minnesota. We specifically requested input into the process of identifying historic properties of religious or cultural significance and sought the Tribal Nation's comments concerning the proposed project. Our only response was from the Flandreau Santee Sioux Tribe of South Dakota which asked that they be notified if any artifacts were found during the ground disturbance. On May 8, 2023, the Saint Paul Heritage Preservation Commission (HPC) held a public hearing in which the proposed project was on the agenda. The public was invited to address the</p>
--	---	---

		HPC in person or in writing with comments. We received written comments from the non-profit organization RETHOS supporting the proposal. The HPC commissioners discussed the proposed project. HPC commissioners commented that they did not "...believe it would affect the University Raymond historic district." The HPC passed a resolution to concur with the determination of no adverse effect." The project is compliant with Section 106 requirements.
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Based on the project description, this project includes no activities that would require further evaluation under HUD's noise regulation. The project is compliant with HUD's Noise regulation.
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The EPA has an online GIS application called "Sole Source Aquifers" that shows the location of SSA's across the country. The only SSA in the state of Minnesota is encompasses Lake Mille Lacs. The project site, 710 Raymond Ave, is approximately 80 miles away from the southernmost point of the Mille Lacs SSA. Since the proposed project site is not on a SSA, the project is in compliance with Sole Source Aquifer requirements.
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The proposed project does not require additional evaluation under this section. This facility is not on land registered in the U.S. Fish and Wildlife Service's geodatabase containing nationally registered wetlands. It will not infringe on non-registered wetlands as well. Therefore, the project is compliant with Executive Order 11990.
Wild and Scenic Rivers Act Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	After utilizing our GIS software, we were able to determine that the project site, 710 Raymond Ave, is not located near any NWSRS. Therefore, the project is compliant the Wild and Scenic Rivers Act.

HUD HOUSING ENVIRONMENTAL STANDARDS		
ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898.

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

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

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

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	1	The proposed project supports the City of Saint Paul's 2040 Comprehensive Plan. The Playwrights' Center will be converting the former "Viking Industrial Center" building into a center dedicated to the development of performing arts. The building set to be converted is in the "Creative Enterprise Zone", which is a city-recognized district and nonprofit organization dedicated to attracting and supporting creative people and businesses. The Creative Enterprise Zone is explicitly mentioned in the 2040 comprehensive plan under Land Use (LU) Policy-6. One of the goals of LU-6 is to "foster equitable and sustainable economic growth by encouraging cultural and arts-based businesses and business districts, such as Little Mekong, Little Africa, Rondo, and the "Creative Enterprise Zone". The proposed project meshes well with the desired outcome of LU-6 (5). In addition, the site is zoned as T-3 Traditional Neighborhood. All uses included within the	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>Playwrights' Center (office, education, theater) are permitted in a T-3 Zone per Table 66.321 "Principal Uses in Traditional Neighborhood Districts" of the City of St Paul Code of Ordinances. As the theater space for Playwrights' Center is less than 500 seats, a conditional use permit is not required for that use per Section 65.657 of the City of St Paul Code of Ordinances. The proposed project will not negatively alter the surrounding man-made environment, and the project design aims to retain most of the original structure. The current project design suggests that the end product will conform to its surroundings. The project will not negatively affect building density in the community as well.</p>	
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2	<p>A Geotechnical Exploration Report for the site was created by American Engineering Testing, Inc. on July 22, 2021. Services provided included (3) test borings from 14-24 feet, soil laboratory testing, and review by a geotechnical engineer. See the attached report for full information on the boring analysis and project recommendations. Generally, the boring encountered a mixture of fill soils, clayey sand till soils, sandy lean clays, and layers of coarse, fine and mixed alluvium. Groundwater was encountered at varying depths from 11-1/2 feet to 23 feet below grade and will be monitored during construction. Groundwater is not expected to enter building excavations. The report recommends preparing the building for foundation and slab support through complete removal of all elements of the portions of the existing building that are to be removed, including all fill soils and softer clayey soils to expose the medium-dense natural alluvial soils on site. If fill is needed to provide compaction support it will be compacted in thin lifts to achieve ASTM</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>standards. The majority of the project is within the existing footprint of the building so soil disruption will be limited only to the new entry. The building is not on a slope and therefore there are no concerns related to the slope. There is no evidence of erosion or sedimentation at the site. The site will not be cleared. An "Erosion and Sediment Control Plan" with details prepared by a licensed Civil Engineer are included in the Construction Documents. These details pertain primarily to the area of the site where hard surfaces are being removed and landscaping is being added. They call out specifically where erosion prevention blankets, silt fence, inlet protection, sediment control log, and construction rock entrance shall be. The site will not significantly affect or be affected by erosion or sedimentation conditions. The proposed project will result in the reduction of the site's impervious area by approximately 11 percent (from existing conditions) and a slight (~3%) reduction in the peak stormwater discharge from the site (for the 100-year storm event). The current and proposed stormwater runoff is routed, through direct piping or overland flow, to the City of St Paul public storm sewer system. The disturbed area for this project is less than 1 acre and thus an NPDES permit is not required. However, sediment and erosion control measures will be installed that are consistent with NPDES requirements. This site is located at the upper end of the public storm sewer system and the adjacent public and private streets provide emergency overflow routing for future increases in precipitation.</p>	
Hazards and Nuisances including Site Safety and Site-Generated Noise	2	The proposed project will not be subject to any unusual natural hazards or be in a position to be affected by such that are uncharacteristic to both the State of	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		Minnesota and the City of Saint Paul. The proposed activity involves the conversion of a commercial structure that has stood collectively since 1994, into a center for the performing arts. It is unlikely to experience a catastrophic natural hazard that it cannot withstand. The site is within Ramsey County, which is a jurisdiction that is in attainment status for the EPA-monitored NAAQS. It is unlikely that the site would be subject to air pollution generators that would negatively affect end-users of the site or air polluters that are unmonitored by the EPA and or MPCA. In addition, unusual Man-Made site hazards are not readily apparent, and it is unlikely that end-users would be subject to such. The same can be said as it relates to nuisances, as the site is unlikely to be affected by fumes, vibration, unsightly land uses, etc. The project itself is not a noise-generating facility nor is it in detrimental proximity to noise-sensitive areas.	
SOCIOECONOMIC			
Employment and Income Patterns	1	The project will increase permanent employment opportunities at Playwrights' Center by creating six (6) new Full Time Equivalent (FTE) jobs and three (3) additional part-time jobs that will be available due to Playwrights' Center's increased space and capacity. These will be professional positions with salaries commensurate with the Area Median Income and may be a combination of local residents and competitive positions for which non-local applicants may relocate to the area. These local jobs will help support other area businesses such as local restaurants and retailers within walking distance of the site. In addition, the construction project will create approximately 115 jobs. Of these about 100 will be maintained jobs from the local	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		construction community and approximately 15 will be new jobs. These will employ a mix of skills and trades including non-skilled and skilled labor. All positions will be compensated based on prevailing wage requirements. Job goals for the inclusion of minority-owned and women-owned businesses will be set by the City of St Paul and complied with by the General Contractor who will meet or exceed these goals.	
Demographic Character Changes / Displacement	2	The proposed project is unlikely to impact the demographic character of the surrounding community. According to the mission statement, one of the many positive objectives the nonprofit is seeking to achieve is to provide BIPOC artists and playwrights with cultural arts facility that can facilitate their development. In addition, the proposed project involves an existing, non-residential, structure and project activity will not displace any sensitive groups.	
Environmental Justice EA Factor	2	No adverse impacts were identified in the project's environmental review.	
COMMUNITY FACILITIES AND SERVICES			
Educational and Cultural Facilities (Access and Capacity)	1	The proposed project is converting a vacant industrial building into a facility that is meant to provide educational services that assist those seeking to pursue a career related to their creative passions. This project will have a positive effect on the surrounding community as it provides new educational opportunities to local youth.	
Commercial Facilities (Access and Proximity)	2	The proposed project involves the development of a new educational facility for those interested in pursuing a career in theater. Since it is not a residential land use, access to commercial facilities to meet daily needs is not of significant concern. Like most educational facilities, services and amenities will likely be offered in-house and	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		will be available to those utilizing the facility for career development or exposure.	
Health Care / Social Services (Access and Capacity)	2	It is unlikely that the new educational facility would burden existing healthcare services. In addition, 710 Raymond Ave is just 0.3 miles or a 6-minute walk from the Light Rail Raymond Avenue Greenline stop. Boarding the Light Rail would enable the user nearly unfettered access to a myriad of health care and social services.	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	1	The project will recycle and recover the following generated waste materials: 2" Minus materials including dirt, sheetrock dust, small/broken aggregate, glass cuttings, and asphalt shingle granules. Aggregate waste includes concrete block, cast-in-place concrete, block, asphalt, plaster, brick, clay tile, and quarry tile. Asphalt shingle waste includes shingles, bundle wrappers (paper or plastic), cardboard boxes, tar paper, vents, eaves, and valley tins. Metal waste includes iron, steel, copper, aluminum, and brass metal scraps from structural members, piping, fasteners, studs, siding, wiring, ductwork, and sheet metal goods. Wood waste includes unpainted, untreated dimensional lumber, timber beams & engineered wood products, and wood shipping pallets and crates. Fiber waste includes cardboard and paper used for packaging. Finish material waste includes carpet and carpet base, and acoustical ceiling tiles. The project will be using Atomic Recycling for construction waste management and recycling which has experience and capacity with projects of this size. In addition, Lloyd's Construction Services will segregate, wrap and recycle all ACT and carpet. A hazardous materials assessment was completed for the project by Wenck Engineering. All assumed asbestos-containing materials will be tested and removed from the site by a licensed	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		abatement contractor per the regulations of the state of Minnesota.	
Waste Water and Sanitary Sewers (Feasibility and Capacity)	2	The existing building is currently connected to a public 8" sanitary sewer line in vacated Myrtle Avenue. During the remodel of the building a new 4" sanitary service will be installed per the City of St. Paul requirements and connected to the existing 8" line that will adequately service the proposed remodel. A series of new 10" and 12" PVC pipes, 6" sub drains, and sewer structures will connect the building to an 18" existing public storm sewer in Myrtle Avenue. Prior to construction, the Contractor will televise existing sanitary service to confirm if any lining or replacement is necessary. Climate-change induced floods are not a concern in this location.	
Water Supply (Feasibility and Capacity)	2	The building is currently connected to a 16" cast iron water in Raymond Avenue, a public right of way, and serviced by St. Paul Regional Water Services (SPRWS), a regional and national water industry leader emphasizing quality water and services. A new 8" DIP (CL 52) water line will be installed in the same location as the existing service to provide combined fire and domestic water to the building after the remodel is complete. SPRWS actively monitors and treats for a wide variety of potential water contaminants including lead, PFAS, Cryptosporidium and Giardia Lamblia, and Legionella in its treatment process and is one of only 30 water utilities in the nation that has received the Partnership for Safe Water award ("President's Award") for five consecutive years. The project water requirements will not significantly change the consumption of the community water supply. SPRWS water is sourced from the Mississippi River. SPRWS has systems in place to actively	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		control current and future blue-green algae, water shortages, and water quality. The project should have no significant impact on this system.	
Public Safety - Police, Fire and Emergency Medical	2	The Saint Paul Police Department, West Command, is located at 1360 University Ave W. According to Google Maps, this is an 8-minute drive via University Avenue, a 7-minute drive via I-94, and a 16-minute ride via the Light Rail. Those times are pedestrian time and responding officers would be on site much quicker than described. Fire Station 20, located at 2179 University Ave W, is within blocks of the proposed project site and would be able to provide an adequate response in case of fire and the site is not in an area of wildfire intensification. M Health Fairview University of Minnesota Medical Center - East Bank provides emergency medical services. According to google maps, the project site is an 8-minute drive and a 20-minute ride using the Light Rail. Responding EMS would provide more prompt transportation and care en route to the hospital in the case of an emergency. The project site is also within an 11-minute drive to M Health Fairview Urgent Care - Highland Park. The project is not anticipated to create a significant burden on police, fire, or healthcare providers.	
Parks, Open Space and Recreation (Access and Capacity)	2	The proposed project itself involves the development of a cultural facility and will be nestled within the Creative Enterprise Zone, which is a city-recognized district and nonprofit organization dedicated to attracting and supporting creative people and businesses. The Raymond Avenue Gallery and Twin City Model Railroad Museum are within walking distance of the project site. Passive recreational activity is a role that is filled by Desnoyer Park, which is within walking distance. Recreational	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		activity is best suited for the South Saint Anthony Recreation Center which is another open space within walking distance.	
Transportation and Accessibility (Access and Capacity)	2	The proposed project did not require a traffic study. The project site has easy access to public transportation, and it is reasonable to expect that the existing and reasonably foreseeable transportation facilities and services will meet project needs. In addition, the site is not likely to cause an adverse impact on local or regional transportation systems, introduce barriers to emergency vehicle access, or introduce low- and moderate-income or minority communities to harmful air pollutants associated with high-traffic areas.	
NATURAL FEATURES			
Unique Natural Features /Water Resources	2	The proposed project will not impact unique natural features. The area the project site is nestled in is highly disturbed and retains none of the assumed natural features prior to modern city development.	
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	1	The proposed landscaping will include the planting of native species of vegetation to draw in pollinators. As a result, benefiting the surrounding ecological environment. The planting of trees and shrubs may help attenuate the urban heat island effect by generating shade and may arguably produce a minor air purification benefit via photosynthesis and sheer physical presence. In addition, the project is likely to have no effect on wildlife due to the nature and setting of the activity.	
Other Factors 1	2	N/a	
Other Factors 2	2	N/a	
CLIMATE AND ENERGY			
Climate Change	2	Over the next 30-40 years, it is unlikely that the project will be subject to future climate threats in a way that is disproportionate to redevelopments in similar settings within the City of Saint Paul. The developers have also considered how the proposed activity	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		could contribute to climate change and are adhering to the State of Minnesota Sustainable Building guidelines. This should nullify any negative effects resulting from project activity.	
Energy Efficiency	1	<p>Please read the following excerpt from the design report concerning energy efficiency...</p> <p>"The new Playwrights' Center project will consist of the renovation of an existing warehouse building to make it the new home of the Playwrights' Center. The renovated facility will consist of a new main event/theater space, community meeting spaces & classroom, office space, writing space, and associated building support spaces including a new main entry link. The existing building consists of warehouse spaces and support offices built in various stages from 1913, 1957, and 1994. The renovated building will be brought up to modern code requirements with new systems to meet the energy efficiency requirements of the State of Minnesota Sustainable Building Guidelines. Based on review and coordination with the Center for the Sustainable Building Research and the SB2030 Energy Standard review team of the State of Minnesota Sustainable Building Guidelines, estimated energy consumption has been targeted. Using the Small Building Prescriptive Approach with the new ASHRAE 90.1-2019 prescriptive requirements, the total building energy use intensity before the use of renewable energy is approximately 42 kBtu / sqft * yr. This energy use intensity reflects a highly energy-efficient building as a baseline for renewable energy feasibility studies. - Cooling Energy: 61,100 kWh per year - Heating Energy: 331,000 kBtu per year - Domestic Hot Water Energy: 7,700 kBtu per year -Electricity Consumption: 78,250 kWh per year -Approximate Annual Energy Cost:</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		\$20,000-\$30,000 -Estimated Annual Carbon Consumption: 100,234 lbs of CO2e annually Energy use estimates and energy breakdowns are based on early conceptual energy modeling using SB2030 conceptual energy model tool coupled with past expertise on similar project types." The project will meet the requirements set by the State of Minnesota Sustainable Building Guidelines as well. All of which indicates at least a minor beneficial impact.	

Supporting documentation

[Initial Results Report - Energy Design Assistance Prepared by Willdan.pdf](#)

[Revised Report of Geotechnical Exploration Prepared by AET Inc.pdf](#)

[Urgent Care Distance.pdf](#)

[Twin City Model Railroad Distance.pdf](#)

[Fire Station Distance.pdf](#)

[Desnoyer Park Distance.pdf](#)

[Conformance with Plans - 2040 Comp Plan LU-6.pdf](#)

[South Saint Anthony Rec Center Distance.pdf](#)

[Raymond Ave Gallery Distance.pdf](#)

[Police Station Distance.pdf](#)

[Playwrights Mission Statement.pdf](#)

[Hospital Distance.pdf](#)

Additional Studies Performed:

Field Inspection [Optional]: Date and completed by:

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

PWC worked with several design, engineering, and agency professionals to develop the Project Scope. This included environmental testing leading to Phase I, Phase II, Soil Vapor Testing, and Asbestos Regulating Materials reports provided by Wenck Engineering. These were submitted to and reviewed by the Minnesota Pollution Control Agency (MPCA) who provided and completed Technical Assistance for the project. American Engineering and Testing (AET) created a Report on Geotechnical

Exploration for the Project Site, the results of which were used by the Civil Engineers at HGA Architects to design the Project. An ALTA Survey including existing utilities and topographies was created by Egan, Field, and Nowak (EFN) to support utility and Civil design by HGA. Construction means and methods are provided by Flannery Construction as Construction Manager, an MN-licensed commercial contractor. HGA Architects designed the building addition and remodel, which was reviewed by the City of St. Paul in their Site Plan Review process. Design updates and meetings were held with the neighborhood District Council Land Use committee, which unanimously supported the project.

List of Permits Obtained:

Public Outreach [24 CFR 58.43]:

The NOI-RROF and FONSI are published in the Pioneer Press, a well-known local newspaper, and on the City of Saint Paul's Environmental Review Webpage. In addition, public comments were heard at various stages of the project. Initiating compliance with Section 106 required consulting with the MN SHPO, appropriate THPOs, and hosting a public hearing at the Heritage Preservation Commission. Throughout the project development process, PWC held meetings with the neighborhood district council.

Cumulative Impact Analysis [24 CFR 58.32]:

After performing this Environmental Assessment (EA), we were able to determine a Finding of No Significant Impact (FONSI). As a result, the cumulative impact on the environment is negligible. Without significant resources put forth and considering that this site is within a historic district, it is unlikely that foreseeable future action would cause negative impacts on the environment. Overall, this project should have a positive effect due to project design and careful consideration regarding climate change and energy efficiency.

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

No Action Alternative [24 CFR 58.40(e)]

In the absence of the proposed undertaking, the site would remain an underutilized vacant industrial building.

Summary of Findings and Conclusions:

This EA did not face significant challenges in achieving compliance with the applicable laws and authorities set forth by NEPA. A mitigation plan was developed to maintain compliance with Contamination and Toxic Substances requirements in case of post-construction soil vapor intrusion. In addition, the proposed project will have a positive impact on the surrounding community as it will repurpose a vacant industrial structure, converting it to an institutional use that will uplift the community for years to come.

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

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

Law, Authority, or Factor	Mitigation Measure or Condition	Comments on Completed Measures	Mitigation Plan	Complete
Contamination and Toxic Substances	See Project Mitigation Plan Section...	N/A	As a result of the MPCA's recommendations, the developer will draft and implement a Response Action Plan and/or Construction Contingency Plan under MPCA approval to manage any environmental conditions encountered prior to and during construction. The proposed addition will include a passive mitigation system, which could become active if there were soil	

			vapor intrusion problems identified.	
--	--	--	--	--

Project Mitigation Plan

As a result of the MPCA's recommendations, the developer will draft and implement a Response Action Plan and/or Construction Contingency Plan under MPCA approval to manage any environmental conditions encountered prior to and during construction. The proposed addition will include a passive mitigation system, which could become active if there were soil vapor intrusion problems identified. The Developer will notify the City of Saint Paul if this mitigation plan is not carried out.

Supporting documentation on completed measures

APPENDIX A: Related Federal Laws and Authorities

Airport Hazards

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

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

✓ No

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

Yes

Screen Summary

Compliance Determination

Using our GIS software, we were able to determine that the project site, 710 Raymond Ave, is not within 2,500 feet of either civilian airport in the Twin Cities. In addition, there are no military airports within 15,000 feet of the project site. The project is compliant with HUD's Airport Hazards policy.

Supporting documentation

[1 Airport Hazards.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Coastal Barrier Resources

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

1. Is the project located in a CBRS Unit?

✓ No

Document and upload map and documentation below.

Yes

Compliance Determination

We utilized the U.S. Fish and Wildlife Service's "Coastal Barrier Resources System Mapper" GIS application to determine whether the project site falls into a CBRS. According to the USFWS, the only CBRS found in Minnesota is the "John H. Chafee CBRS" in Duluth, Minnesota. Since the proposed HUD project is in the city of Saint Paul, Minnesota, approximately 160 miles south of the "John H. Chafee CBRS", it can be determined that there will be no effect. Therefore, this project is compliant with the Coastal Barrier Resources Act.

Supporting documentation

[2 CBRS.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Flood Insurance

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

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

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

✓ Yes

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

[3 FIRMette.pdf](#)

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

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

✓ No

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

Yes

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

Yes

✓ No

Screen Summary

Compliance Determination

According to the map generated by FEMA's National Flood Hazard Layer (NFHL) GIS application, it was determined that the project site is in FEMA FIRMette Map Panel Number: 27123C0080G. This panel has been in effect since 6/4/2010 and is labeled as "Zone X (Unshaded)". Since the proposed HUD-Assisted project occurs in an unshaded "Zone X" area, it can be determined that 710 Raymond Ave is neither in a Special Flood Hazard Area (SFHA) or an area of Moderate Risk. Flood insurance will serve no purpose, nor will it be necessary to serve as mitigation. Therefore, the project is compliant with Flood Insurance requirements.

Supporting documentation

[3 FIRMette\(1\).pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Air Quality

General requirements	Legislation	Regulation
The Clean Air Act is administered by the U.S. Environmental Protection Agency (EPA), which sets national standards on ambient pollutants. In addition, the Clean Air Act is administered by States, which must develop State Implementation Plans (SIPs) to regulate their state air quality. Projects funded by HUD must demonstrate that they conform to the appropriate SIP.	Clean Air Act (42 USC 7401 et seq.) as amended particularly Section 176(c) and (d) (42 USC 7506(c) and (d))	40 CFR Parts 6, 51 and 93

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

☒ Yes

☐ No

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

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

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

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

Screen Summary

Compliance Determination

The project's county or air quality management district is in attainment status for all criteria pollutants. The project is in compliance with the Clean Air Act.

Supporting documentation

[4 Air Quality.pdf](#)

[4 Saint Paul Park-AQCR 131 SO2 Redesignation to Attainment Notice 5-13-1997.pdf](#)
[4 Ramsey County PM-10 1987 Redesignation to Attainment 7-26-2002.pdf](#)
[4 Minnesota Saint Paul Area CO Redesignation to Attainment Notice 10-29-1999.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Coastal Zone Management Act

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

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

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.

Screen Summary

Compliance Determination

In the state of Minnesota, the only coastal zone that is protected by the Coastal Zone Management Act (CZMA) is along the coast of Lake Superior. The project occurs in the City of Saint Paul and the proposed project site, 710 Raymond Ave, is approximately 130 miles away from coastal areas protected in the Minnesota Department of Natural Resources coastal management plan. Therefore, the project is compliant with the Coastal Zone Management Act.

Supporting documentation

[5 CZMA.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Contamination and Toxic Substances

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

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

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

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

No

- ☒ Yes

3. Mitigation

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

Can adverse environmental impacts be mitigated?

Adverse environmental impacts cannot feasibly be mitigated.

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

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

See Project Mitigation Plan Section...

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

Complete removal

- ✓ Risk-based corrective action (RBCA)

Screen Summary

Compliance Determination

The following is a timeline that represents how the facility was assessed for on-site contamination... On September 18th, 2018 -WENCK Associates performed a Phase I ESA and found no Recognized Environmental Conditions (RECs), Controlled Recognized Environmental Conditions (CRECs), or Historical Recognized Environmental Conditions (HRECs). However, there were several facilities in close proximity to the site that were associated with releases of petroleum and/or other solvents which WENCK considered an REC for the subject property 710 Raymond Ave. On October 29th, 2018 -WENCK Associates performed a Phase II ESA. WENCK then listed the following conclusions... - That the Subject Property should be enrolled in the MPCA Voluntary Brownfields Program -Apply for a No Association Determination and No Action Determination related to the site testing -If the Subject property is to be redeveloped, a Response Action Plan and/or Construction Contingency Plan may be required by the MPCA depending on the development plans and the proposed future use On November 16th, 2018 -WENCK wrote a letter to the MPCA requesting a No Association Determination and No Action Determination On January 7th, 2019 -The MPCA issued the No Association Determination On May 22nd, 2019 -The MPCA determined that the subject property did not require a vapor intrusion mitigation system at this time -The

MPCA recommended that future construction activities at the site within the footprint of the proposed construction area be preceded by a soil vapor investigation. As a result of the MPCA's recommendations, the developer will draft and implement a Response Action Plan and/or Construction Contingency Plan under MPCA approval to manage any environmental conditions encountered prior to and during construction. The proposed addition will include a passive mitigation system, which could become active if there were soil vapor intrusion problems identified. In addition, we visited the EPA's "NEPAssist" and Minnesota Pollution Control Agency's (MPCA) "What's in My Neighborhood" (WIMN) GIS web applications to identify sources of contamination within 1/2 mile of the proposed HUD-assisted project site. On NEPAssist, there were no Superfund sites in the immediate vicinity (2 to 4 Blocks) or within 1/2 mile of 710 Raymond Ave. There were two Brownfield sites in the immediate vicinity (2 to 4 Blocks) and 1 Brownfield site within 1/2 mile of the proposed project site. As evidence of due diligence, these sites will be listed below and the NEPAssist Report will be uploaded to HEROS. Site 1: 750 Pelham Blvd, Saint Paul, MN 55114 -The EPA's Cleanups in My Community Page (CIMC) lacked sufficient information to determine compliance. However, the MPCA indicated that site work initially concluded in 2000. The site was subject to a vapor reassessment in 2019 which concluded 6/30/2019. No further action required. Site 2: 721 Raymond Ave/2391 Myrtle St, Saint Paul, MN 55114 (City Sounds) -According to the EPA's CIMC page, extensive site work took place. Various environmental site investigations found Arsenic, Asbestos, Cadmium, Chromium, Copper, Lead, Nickel, other metals, PAHS, Petroleum products, SVOCs, and VOCs. These contaminants have been brought to acceptable levels in relevant media and as a result, the site is ready for its anticipated use and redevelopment is underway. No further action required. Site 3: 2108 University Ave, Saint Paul, MN 55114 -The EPA's Cleanups in My Community Page (CIMC) lacked sufficient information to determine compliance. However, the MPCA indicated that site investigation closed 1/6/2015, indicating that contamination has been remediated. No further action required. The project is compliant with Contamination and Toxic Substances requirements.

Supporting documentation

[6 EPA CIMC 2108 University Ave.pdf](#)

[6 EPA CIMC 750 Pelham Blvd.pdf](#)

[6 EPA CIMC 721 Raymond Ave - 2391 Myrtle St.pdf](#)

[6 NEPAssist Report.pdf](#)

[6 MPCA 2108 University Ave.pdf](#)

[6 MPCA 750 Pelham Blvd.pdf](#)

[MPCA Letter Confirming Soil Vapor Assessment Completion 5-22-2019.pdf](#)

[Limited-Destructive Asbestos and Reg Materials Survey Report.pdf](#)

[Draft - Phase II ESA.pdf](#)

[Draft - Phase I ESA.pdf](#)

[WENCK Request for NAD and No Action Letter 11-16-2018.pdf](#)

[Second Round Sub-Slab Sampling Results memo 710 Raymond Ave 012519.pdf](#)
[MPCA No Association Determination Letter 1-7-2019.pdf](#)

Are formal compliance steps or mitigation required?

✓ Yes

No

Endangered Species

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

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

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

This selection is only appropriate if none of the activities involved in the project have potential to affect species or habitats. Examples of actions without potential to affect listed species may include: purchasing existing buildings, completing interior renovations to existing buildings, and replacing exterior paint or siding on existing buildings.

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

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

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

Screen Summary

Compliance Determination

The following species were identified in the IPaC species list generated on June 27th, 2023: Northern Long-eared Bat, Tricolored Bat, Higgins Eye (pearlymussel), Snuffbox Mussel, Winged Mapleleaf (mussel), Rusty Patched Bumble Bee, and Monarch Butterfly. Project activities will have no effect on the Northern Long-eared Bat. This

determination can be made because project activities do not involve clearing or disturbing suitable habitat, no activity in or near the entrance to cave or mine, nor mining, deep excavation, or underground work within 0.25 miles of a cave or mine, nor construction of wind turbines or demolition or reconstruction of human made structures known to be used by bats. Project activities will have no effect on the Tricolored Bat. This determination can be made because project activities do not involve clearing or disturbing suitable habitat, no activity in or near the entrance to cave or mine, nor mining, deep excavation, or underground work within 0.25 miles of a cave or mine, nor construction of wind turbines or demolition or reconstruction of human made structures known to be used by bats. Project activities will have no effect on the Higgins Eye (pearly mussel). This determination can be made because project activities do not involve habitat loss, degradation, or introduction of exotic species including Zebra mussels, which are the major threats to the survival of the Higgins eye mussel. Project activities will have no effect on the Snuffbox Mussel. This determination can be made because project activities do not involve the construction of dams, sedimentation, introduction of pollutants, channelization, or the introduction of exotic species including Zebra mussels. Project activities will have no effect on the Winged Mapleleaf (mussel). This determination can be made because project activities do not involve the construction of dams, sedimentation, introduction of pollutants, channelization, or the introduction of exotic species including Zebra mussels. Project activities will have no effect on the Rusty Patched Bumble Bee. This determination can be made because project activities do not involve habitat loss, degradation, or introduction of pathogens or exposure to insecticides or fungicides, which are suspected to be the major threats to the species along with non-native and managed bees, the effects of climate change, and small population biology. The Monarch Butterfly is a candidate species and not yet listed or proposed for listing. There are currently no section 7 requirements for candidate species. Project activities will not impact known habitat. Project activities do not involve construction of Communication Towers (radio, television, cellular, and microwave towers), Transmission Lines (power lines or poles, particularly those with uninsulated or unguarded electrical currents), or Wind Turbines. Therefore, there will be no effect on migratory birds. In addition, there are no critical habitats for the listed species within the project area under the USFWS jurisdiction. The project site is in a fully urbanized area and there is no habitat present in the project site for the species on the IPaC list. The proposed project activities will not jeopardize the continued existence of any listed species. Therefore, the project is compliant with Section 7 requirements.

Supporting documentation

[7 ESA.pdf](#)

Are formal compliance steps or mitigation required?

The-Playwrights'-Center-
New-Home

Saint Paul, MN

900000010329856

Yes

✓ No

Explosive and Flammable Hazards

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

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

✓ No

Yes

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

✓ No

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

Yes

Screen Summary

Compliance Determination

Based on the project description, no further evaluation is required. The project does not involve rehabilitation or modernization that will result in residential densities being increased or the conversion of a building use to another that results in residential habitation. The project is compliant with Explosive and Flammable Hazard requirements.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Farmlands Protection

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

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

Yes

✓ No

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

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

Screen Summary

Compliance Determination

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

Supporting documentation

[9 FPPA.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Floodplain Management

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

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

- 55.12(c)(3)
- 55.12(c)(4)
- 55.12(c)(5)
- 55.12(c)(6)
- 55.12(c)(7)
- 55.12(c)(8)
- 55.12(c)(9)
- 55.12(c)(10)
- 55.12(c)(11)

✓ None of the above

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

[3 FIRMette.pdf](#)

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

Does your project occur in a floodplain?

✓ No

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

Yes

Screen Summary

Compliance Determination

According to the FIRMette map, generated using FEMA's GIS web application, the proposed HUD project site was found in FIRMette Map Panel Number: 27123C0080G. This panel has been in effect since 6/4/2010 and indicates that the address, 710 Raymond Ave, is not located on a floodplain. Therefore, the project is compliant with Executive Order 11988.

Supporting documentation

[3 FIRMette\(2\).pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Historic Preservation

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

Threshold

Is Section 106 review required for your project?

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

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

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

Screen Summary

Compliance Determination

The City of Saint Paul initiated consultation with the Minnesota State Preservation Office (SHPO) and the appropriate Tribal Historic Preservation Offices (THPOs) to ensure Section 106 Compliance with the proposed undertaking. The proposed HUD-assisted project received a memo from the Minnesota State Historic Preservation Office (MN SHPO). In this memo, it was concluded that proposed activity would have "no adverse effect" on the University-Raymond Historic District. The following summarizes the consultation and public involvement portion of determining Section

106 compliance. "On May 2, 2023, City of Saint Paul HP Staff notified the following Tribal Nations about the undertaking, pursuant to 36 CFR 800 and Minn. Stat. 10.65: Lower Sioux Indian Community in the State of Minnesota, Apache Tribe of Oklahoma, Cheyenne and Arapaho Tribes, Oklahoma, Iowa Tribe of Kansas and Nebraska, Prairie Island Indian Community in the State of Minnesota, Santee Sioux Nation, Nebraska, Fort Belknap Reservation of Montana, Menominee Indian Tribe of Wisconsin, Flandreau Santee Sioux Tribe of South Dakota, and the Upper Sioux Community, Minnesota. We specifically requested input into the process of identifying historic properties of religious or cultural significance and sought the Tribal Nation's comments concerning the proposed project. Our only response was from the Flandreau Santee Sioux Tribe of South Dakota which asked that they be notified if any artifacts were found during the ground disturbance. On May 8, 2023, the Saint Paul Heritage Preservation Commission (HPC) held a public hearing in which the proposed project was on the agenda. The public was invited to address the HPC in person or in writing with comments. We received written comments from the non-profit organization RETHOS supporting the proposal. The HPC commissioners discussed the proposed project. HPC commissioners commented that they did not "...believe it would affect the University Raymond historic district." The HPC passed a resolution to concur with the determination of no adverse effect." The project is compliant with Section 106 requirements.

Supporting documentation

[11 710 Raymond Playwrights Center.pdf](#)

[11 Rethos Letter of Support-Playwrights Center - May082023.pdf](#)

[11 res CLG review Playwright Center.pdf](#)

[11 Flandreau Santee Sioux Tribe 710 Raymond comments.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Noise Abatement and Control

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

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

New construction for residential use

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

Screen Summary

Compliance Determination

Based on the project description, this project includes no activities that would require further evaluation under HUD's noise regulation. The project is compliant with HUD's Noise regulation.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

The-Playwrights'-Center-
New-Home

Saint Paul, MN

900000010329856

✓ No

Sole Source Aquifers

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

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

✓ Yes

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

No

Screen Summary

Compliance Determination

The EPA has an online GIS application called "Sole Source Aquifers" that shows the location of SSA's across the country. The only SSA in the state of Minnesota is encompasses Lake Mille Lacs. The project site, 710 Raymond Ave, is approximately 80 miles away from the southernmost point of the Mille Lacs SSA. Since the proposed project site is not on a SSA, the project is in compliance with Sole Source Aquifer requirements.

Supporting documentation

[13 SSA.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Wetlands Protection

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

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

✓ No

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

Yes

Screen Summary

Compliance Determination

The proposed project does not require additional evaluation under this section. This facility is not on land registered in the U.S. Fish and Wildlife Service's geodatabase containing nationally registered wetlands. It will not infringe on non-registered wetlands as well. Therefore, the project is compliant with Executive Order 11990.

Supporting documentation

[14 Wetlands Protection.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Wild and Scenic Rivers Act

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

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

✓ No

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

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

Screen Summary

Compliance Determination

After utilizing our GIS software, we were able to determine that the project site, 710 Raymond Ave, is not located near any NWSRS. Therefore, the project is compliant the Wild and Scenic Rivers Act.

Supporting documentation

[15 NWSRS.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Environmental Justice

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

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

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

Yes

✓ No

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

Screen Summary

Compliance Determination

No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No