

**NOTICE OF FINDING OF NO SIGNIFICANT IMPACT AND
NOTICE OF INTENT TO REQUEST RELEASE OF FUNDS**

April 27, 2020

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 June 1, 2020, the City of Saint Paul will submit a request to the U.S. Department of Housing and Urban Development (HUD) for the release of Block Grant funds under Title I of the Housing and Community Development Act of 1974, as amended (PL 93-383), to undertake projects in the amounts set forth below for the purposes stated.

Block Nurse Program/Citywide/\$83,000/A multi-year program that provides assistance to Block Nurse programs throughout the City through in-home nursing services to seniors; Como Park, Conway/Battle Creek, Hamline-Midway, Highland, Macalester-Groveland, Merriam Park, North End/South Como, Payne-Phalen, St. Anthony Park, Summit-University, Summit Hill and West Seventh. The program also receives local funding.

Capital City Youth Employment Program/Citywide/\$371,000/A multi-year program that provides economically disadvantaged income-eligible Saint Paul youth with educational and part-time employment, remedial education, classroom and occupational skills training. Youth are referred to this program by the Saint Paul School District and other community organizations.

Community Engagement (\$345,000): This new program provides funding for District Councils in Planning Districts 1-8, 11, and 17 for crime prevention, community development and policy development activities. This program also receives local funding.

Neighborhood Nonprofit Organizations/Citywide/\$169,000/A multi-year program that provides assistance to nonprofit organizations throughout the City for services for children, youth, families and senior citizens; domestic violence prevention; citizen participation; conflict resolution; emergency shelter; and community restorative justice. The program also receives local funding.

Planning and Administration (\$1,779,673): Funding for the management, coordination, oversight and monitoring of the Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) programs. Funding for Planning Activities in CDBG Eligible areas of the City, as well as environmental and historic reviews of HUD funded projects.

For all the programs above, the following Tier 1 conclusion is that all these activities are Exempt pursuant to 24 CFR §85.34.

Acquisition Activities/City Wide/\$225,000/Enable strategic acquisition of vacant lots, hazardous and/or blighted properties for reuse with input and support from applicable recognized community

organizations representing the neighborhood in which the property is located. The program is categorically excluded based on 24 CFR Part 58.35(a)(1), 58.35(a)(5) and 58.35(a)(6).

Citywide Homeowner Improvement Loan Program/Citywide/\$860,000/Assist low-income households to rehabilitate their homes by addressing building code enforcement, lead paint abatement, hazardous waste treatment, handicap accessibility, energy improvements and window, roof and siding replacement, emergency water/sewer lines, deficient furnaces and broken water heaters repairs/replacement. The program is categorically excluded based on 24 CFR Part 58.35(a)(3)(i).

East Side Home Improvement Revolving Loan Fund/Districts 4 & 5/\$300,000/Dayton's Bluff Neighborhood Housing Services (DBNHS) will provide low-interest home improvement loans and construction management to help low- and very low-income households maintain and improve their homes. The program is categorically excluded based on 24 CFR Part 58.35(a)(3)(i).

Home Improvement Plus/Districts 1 & 2/\$75,000/North East Neighborhoods Development Corporation (NENDC) will provide low-interest home improvement loans to low- and moderate-income homeowners living on the East Side. The program is categorically excluded based on 24 CFR Part 58.35(a)(3)(i).

North End Revitalization Fund/Districts 6, 7, 8, 10, 11 & 12/\$125,000/NeighborWorks Home Partners will provide construction management and home-improvement loans to help low- to moderate-income homeowners make health and safety repairs to their homes in the North End and South Como neighborhoods. The program is categorically excluded based on 24 CFR Part 58.35(a)(3)(i).

St. Paul Home Improvement Loan Fund/Citywide/\$125,000/NeighborWorks Home Partners will provide construction management and home improvement loans for low- to moderate-income homeowners in Saint Paul with a focus on underrepresented neighborhoods citywide. The program is categorically excluded based on 24 CFR Part 58.35(a)(3)(i).

St. Paul Green Line Home Improvement Loan Program/Districts 7, 8, 11, & 13/\$125,000/NeighborWorks Home Partners will provide home improvement loans and grants and construction management for low- to moderate-income homeowners along the Green Line transit corridor. The program is categorically excluded based on 24 CFR Part 58.35(a)(3)(i).

East Side Homeownership Initiative/Districts 4 & 5/\$100,000/DBNHS will construct or rehab and resell to low- and very low-income households single-family homes on existing scattered site vacant lots in Dayton's Bluff, Payne Phalen and North East neighborhoods. The program is categorically excluded based on 24 CFR Part 58.35(a)(3)(i), 58.35(a)(4)(i), 58.35(a)(5) and 58.35(a)(6).

Rondo Community Land Trust Affordable Housing Development/Districts 7, 8, & 13/\$180,000/Rondo Community Land Trust (RCLT) will build new and rehab existing housing for low- and moderate-income homeowners. Houses will remain affordable for future generations by placing it in the land trust. The program is categorically excluded based on 24 CFR Part 58.35(a)(3)(i), 58.35(a)(4)(i) and 58.35(a)(6).

West Side Acquisition/Rehabilitation Revolving Loan Fund/District 3/\$100,000/Neighborhood Development Alliance (NeDA) will buy small, battered rental properties for rehab/resale as single-family homes for low- to moderate-income households. The program is categorically excluded based on 24 CFR Part 58.35(a)(3)(i), 58.35(a)(5) and 58.35(a)(6).

Housing Real Estate Multi-Unit Development Fund/Citywide/\$735,000/Assist in financing the preservation, rehab or new production of affordable housing. Implement CDBG eligible activities related to acquisition, rehab and new construction, e.g. relocation, demolition, site preparation, and

adjacent public improvements, all of which are part of the total development cost of a housing project. Implement the housing component of larger mixed-use developments as determined by the Mayor, City Council/HRA and neighborhood. The program is categorically excluded based on 24 CFR Part 58.35(a)(1), 58.35(a)(2), 58.35(a)(3)(i), 58.35(a)(3)(ii), §58.35(a)(3)(iii), 58.35(a)(4)(i), 58.35(a)(4)(ii), 58.35(a)(5) and 58.35(a)(6).

Housing Construction/Citywide/\$512,000/Produce new affordable ownership and rental housing units through rehab of vacant structures or new construction, both of which may include acquisition, demolition and relocation. The program is categorically excluded based on 24 CFR Part 58.35(a)(2), 58.35(a)(3)(i), 58.35(a)(3)(ii), 58.35(a)(4)(i), 58.35(a)(4)(ii), 58.35(a)(5) and 58.35(a)(6).

Citywide Micro-Enterprise TA/Citywide/\$25,000/Provide technical assistance services to micro-enterprise businesses throughout the City. The program is categorically excluded based on 24 CFR Part 58.35(b)(4).

Commercial Node and Citywide Economic Development/Citywide/\$75,000/Provide financing to assist businesses with expansion, property acquisition, rehabilitation and energy conservation improvements. Projects will be prioritized based on the City's Commercial Corridor Work Plans for coordinated, concentrated and comprehensive improvements. The program is categorically excluded based on 24 CFR Part 58.35(a)(3)(iii), 58.35(a)(5) and 58.35(a)(6).

Business Investment Fund/District 5/\$180,000/East Side Neighborhood Development Company (ESNDC) program to revitalize and stimulate investment along the Payne-Arcade Commercial District through financing façade improvements and code-related rehab for commercial buildings and private investment gap financing for new development on Payne Avenue for construction costs. The program is categorically excluded based on 24 CFR Part 58.35(a)(3)(iii), 58.35(a)(5) and 58.35(a)(6).

Economic Development Loan Leverage Fund/Districts 1, 2 & 5/\$50,000/NENDC will provide businesses with loans, grants and financing for acquisition, development and redevelopment projects, including demolition and site preparation, focused for projects located at White Bear Avenue, Phalen Village and East Seventh Street. The program is categorically excluded based on 24 CFR Part 58.35(a)(3)(iii), 58.35(a)(2), 58.35(a)(5) and 58.35(a)(6).

North End Façade Improvement/District 6/\$45,000/ESNDC will provide financial and technical assistance and deferred loans to rehab commercial storefronts within the boundaries of North End-District 6. The program is categorically excluded based on 24 CFR Part 58.35(a)(3)(iii), 58.35(a)(5) and 58.35(a)(6).

Restore Saint Paul/Districts 3, 4, 5, 6, 7, 8, & 9/\$125,000/Historic Saint Paul will provide financing, technical assistance and project management to undertake historically appropriate storefront improvement projects in the City's oldest, low- to moderate-income neighborhoods. The program is categorically excluded based on 24 CFR Part 58.35(a)(3)(iii), 58.35(a)(5) and 58.35(a)(6).

West Side Commercial Rehab/District 3/\$80,000/NeDA will provide financial and technical assistance and deferred and forgivable loans for rehab of commercial storefronts and code related repairs for the West Side Neighborhood. The program is categorically excluded based on 24 CFR Part 58.35(a)(3)(iii), 58.35(a)(2), 58.35(a)(5) and 58.35(a)(6).

Vacant and Hazardous Building Demolition/Citywide/\$231,500/A citywide, multi-year program to clear buildings considered nuisance properties and/or pose a threat to public health and safety. Properties must have been vacant for at least one year or vacant and unfit for habitation for at least 90 days. The program is administered by City' Code Enforcement staff, Department of Safety and Inspections. The program is categorically excluded based on 24 CFR Part 58.35(a)(1),

58.35(a)(2), 58.35(a)(3)(i), 58.35(a)(3)(ii), 58.35(a)(3)(iii), 58.35(a)(4)(i), 58.35(a)(4)(ii), 58.35(a)(5) and 58.35(a)(6).

Emergency Solutions Grant (\$594,358): Funding for homeless prevention, operating costs of shelters, essential services, improvements to homeless facilities, rapid rehousing (rental assistance, case management), data collection and ESG administration. The program is categorically excluded based on 24 CFR Part 58.35(b)(2) and 58.35(b)(3).

Hamline Park Play Area/\$373,500/Improvements include replacement of existing play equipment that meets current safety and accessibility guidelines and improvements to playground safety surfacing. Additional site amenities include benches, waste containers, signage and landscaping as necessary and as funding allows. **Environmental Review Determination: Categorically Excluded**

Northwest University and Dale Facility/\$250,000/Neighborhood Development Center (NDC) will create a project that will provide space for the organization's headquarters, an expanded training center and retail incubator space for neighborhood entrepreneurs to start and grow businesses in their own communities. **Environmental Review Determination: Categorically Excluded**

Level of Environmental Review Citation: For all the above programs, the following Tier 1 conclusion is that all these activities are Categorically Excluded.

Tier 2 Site Specific Review: The above activities will be assessed on a site-by-site basis in the site-specific reviews. Tier 2 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:

- Historic Preservation [36 CFR Part 800]
 - Any building at least 50 years old or are listed as a locally or nationally registered historic building will need to be reviewed by the Minnesota State Historic Preservation Office (SHPO) to determine if the building(s) will be negatively impacted by the proposed project. Eligible or designated historic sites are determined using the Ramsey County Property and Home webpage (<https://www.ramseycounty.us/residents/property>), National Register of Historic Places webpage (National Register of Historic Places) and City of Saint Paul Internal webmap and Historic Preservation Officers.
 - Mitigation measures or conditions could involve either SHPO or the City of Saint Paul Historic Preservation Officer, developer, project coordinator and engineer/consultant to re-evaluate site and construction plans.
- Floodplain Management [24 CFR 55, Executive Order 11988]
 - The Federal Emergency Management Agency website (www.fema.gov) will be used to determine the project site location relative to the designated floodplain areas.
 - Mitigation measures, conditions, or permits may include a HUD specialist, DNR, developer, project coordinator and engineer/consultant to re-evaluate site and construction plans.
- Wetland Protection [Executive Order 11990]
 - The U.S. Fish and Wildlife Service Wetland Mapper webpage (<https://www.fws.gov/wetlands/data/Mapper.html>) will be used to determine the project site location relative to federally identified wetland areas. Additional resource includes the Minnesota Department of Natural Resource (<https://www.dnr.state.mn.us/>)
 - Mitigation measures, conditions and permits may include the relevant HUD specialist/representative, DNR, developer, project coordinator and engineer/consultant

with re-evaluating the site and construction plans for compliance with the Wetland Protection regulations.

- Endangered Species Act [50 CFR 402]
 - Resource used to complete this review will be from the Minnesota Department of Natural Resource (<https://www.dnr.state.mn.us/>) and U.S. Fish and Wildlife Services (<https://www.fws.gov>).
 - Mitigation measures or conditions will include the relevant HUD specialist/representative, DNR, developer, project coordinator and engineer/consultant to determine to develop project for compliance with the Endangered Species Act.
- Clean Air Act [Sections 176(c), (d) and 40 CFR 6, 51, 93]
 - The Environmental Protection Agency (https://www3.epa.gov/airquality/greenbook/anayo_mn.html) data will be used to determine the projects relative air quality.
 - Mitigation will be necessary if emission levels of the following pollutants carbon monoxide, lead, sulfur oxides, Nitrous oxides, ground-level ozone and particulate matter are found to be not within acceptable ranges. Mitigation measures will include the relevant HUD specialist, developer, project coordinator and engineer/consultant to re-evaluate the site and construction plans and additional studies if necessary, for compliance with the Clean Air Act.
- Environmental Justice [Executive Order 12898]
 - Reviews will ensure minority or low-income population related to the community at large will not be negatively affected by any project using the follow criteria access to public transit, local amenities and other laws and authorities. Resources to be used are Google maps and data collected the from other reviews.
 - Mitigation measures and conditions will involve the relevant HUD specialist, developer, project coordinator and engineer/consultant to re-evaluate the location, site plan and construction design to support environmental justice.
- Noise Abatement and Control [24 CFR 51B]
 - Resources used to complete this review will include Google Maps/Earth or a map with measuring tool, Minnesota Department of Transportation (<https://mndot.maps.arcgis.com/> and <https://www.dot.state.mn.us/ofrw/freight/data.html>), [Day/Night Noise Level \(DNL\) Calculator Electronic Assessment Tool](https://www.hudexchange.info/environmental-review/dnl-calculator/) (<https://www.hudexchange.info/environmental-review/dnl-calculator/>) and DNL calculation sheet, Barrier Performance Module (<https://www.hudexchange.info/programs/environmental-review/bpm-calculator/>).
 - Mitigation will be necessary if noise levels above 75 decibels. Mitigation measures will include the relevant HUD specialist, developer, project coordinator and engineer/consultant to re-evaluate the site plan and construction design and additional studies if necessary, for compliance with the Noise Abatement and Control regulations.
- Toxic Chemicals and Radioactive Materials [24 CFR 58.5(i)]
 - The Minnesota Pollution Control Agency web application (<https://mpca.maps.arcgis.com/apps/webappviewer/index.html>) and Ramsey County Environmental Health Division (<https://www.ramseycounty.us/>) will be used to identify and review known hazardous waste sites that may be health risk.
 - Mitigation will be necessary when a known active hazardous waste site is onsite or within close proximity to the project. Mitigation measures will include the relevant HUD specialist, DNR, developer, project coordinator and engineer/consultant to re-evaluate construction plans for with the Toxic Chemicals and Radioactive Materials regulations.
- Explosive and Flammable Operations [24 CFR 51C

- The Minnesota Pollution Control Agency web application (<https://mpca.maps.arcgis.com/apps/webappviewer/index.html>), Ramsey County Environmental Health Division (<https://www.ramseycounty.us/>), and the HUD Acceptable Separation Distance Electronic Assessment Tool (<https://www.hudexchange.info/environmental-review/asd-calculator/>) will be used to identify and review known sites with aboveground tanks and other explosive and flammable operations that may be a health risk.
- Mitigation measures will include the relevant HUD specialist, developer, project coordinator and engineer/consultant to re-evaluate site and construction plans for compliance with the explosive and flammable regulations.

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 website <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 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. All comments received by May 14, 2020 will be considered by the City of Saint Paul prior to authorizing submission of a request for 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 its 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) at marcia.a.kolb@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
390 City Hall
15 West Kellogg Blvd
Saint Paul, MN 55102