

## NOTICE OF INTENT TO REQUEST RELEASE OF FUNDS

June 25, 2026

City of Saint Paul  
1300 City Hall Annex  
25 West Fourth Street  
Saint Paul, Minnesota 55102  
651-266-6646

**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 July 3<sup>rd</sup>, 2026 the City of Saint Paul will submit a request to HUD for the release of \$960,000 of Community Development Block Grant funds under 42 U.S.C. 4321, et seq., of the National Environmental Policy Act of 1969 as amended, to undertake the following project:

**Tier 1 Broad Review Project/Program Title:** East Side Homeownership Initiative Fiscal Year 2026-2027.

**Purpose:** Through the East Side Homeownership Initiative, DBNHS will construct 6 new single family homes on existing scattered site vacant lots in Dayton's Bluff, Payne Phalen and Greater East neighborhoods, and sell the houses to low and very low income households.

**Location:** Citywide in the City of Saint Paul, Minnesota, primarily on the East Side.

**Project/Program Description:** DBNHS will build 6 single family homes (3 per year) on existing vacant lots. All of these homes will have at least 3 bedrooms with build out space in the lower level to accommodate larger household sizes. The CDBG funds combined with other sources will be used as "construction gap financing" to bridge the gap between what it costs to build a new house and what a new house will appraise for. When necessary, DBNHS will provide entry cost assistance, with our own funds, to make our houses affordable to the end buyers.

**Level of Environmental Review Citation:** *24 CFR 58.35(a)(4)(ii).*

**Tier 2 Site Specific Review: The site specific reviews will cover the following laws and authorities not addressed in the Tier 1 broad review:** Airport Hazards, Flood Insurance, Air Quality, Contamination and Toxic Substances, Endangered Species, Explosive and Flammable Hazards, Floodplain Management, Historic Preservation, Noise Abatement and Control, Wetlands Protection.

**Mitigation Measures/Conditions/Permits (if any):**

Airport Hazards: The project site will be evaluated to determine its proximity to 3,000 feet of a civilian airport or 15,000 miles of a military airfield. If the site is within a designated Airport Clear Zone or Runway Clear Zone additional research will be conducted in compliance with 24 CFR Part 51 Subpart D.

**Flood Insurance:** The project site will be evaluated using the FEMA FIRMette map to determine if the site is within a flood plain. If the site is within a designated flood plain research will be conducted to determine whether the site has flood insurance or needs to be obtained. If the project does not meet compliance consultation with HUD, the DNR, and/or other agencies will be contacted. If the project is still not in compliance after consultation with the Flood Insurance requirements the project will not move forward.

**Air Quality:** The site specific project will evaluate the air quality management district or county to determine the non-attainment or maintenance status for any criteria pollutants in the area. The following link will be used to determine the compliance status of project:

[https://www3.epa.gov/airquality/greenbook/anayo\\_mn.html](https://www3.epa.gov/airquality/greenbook/anayo_mn.html). If the air quality is not in compliance, consultation may be necessary with HUD, MPCA, Ramsey County, or any other relevant agency. Any sites project that is not in compliance will not be eligible for funding.

**Contamination and Toxic Substances:** Each site will be mapped and a study area of .25 mile from the site will be evaluated for contaminated and toxic sites and sites located within 3,000 feet of a toxic or solid waste landfill site will be evaluated more closely to determine if the site is safe using the Minnesota Pollution Control Agency's data. If any contaminated sites are found consultation with one or multiple of the following agencies HUD, DNR, MPCA, Ramsey County, or any other relevant agency. Any sites that is adversely impacted by contamination or hazardous substances will not be eligible.

**Endangered Species:** Site specific revaluation will be completed to ensure no endangered species will be harmed based on the project activities. If activities involved may endanger any species the U.S. Fish and Wildlife Service's online Information for Planning and Consultation portal will be utilized to identify endangered species near the project site. If any activities include development, construction, rehabilitation that will increase residential densities, or conversion, additional research will be taken. If additional research is required a study area using the Minnesota Pollution Control Agency's (MPCA) website will be conducted. If additional consultation is required the relevant agencies will be contacted (DNR, MPCA, County, etc.). If the project is still not in compliance after consultation the project will not move forward.

**Explosive and Flammable Hazards:** The site specific project will determine if the project will develop a hazardous facility (a facility that mainly stores, handles or processes flammable or combustible chemicals such as bulk fuel storage facilities and refineries), or if it will include activities that are development, construction, rehabilitation that will increase residential densities, or conversion. If the site-specific project includes any of these, a study area of 1 mile of the project site will be evaluated for any current or planned stationary aboveground storage containers. All flammable or explosive materials listed in Appendix I of 24 CFR part 51 subpart C will be noted and evaluated. When necessary, the HUD Acceptable Separation Distance Electronic Assessment Tool will be used to calculate the required separate distance. If additional consultation is necessary the MPCA, Ramsey County, or any other relevant agency will be contacted. Any sites that is adversely impacted by explosive and flammable hazards will not be eligible for funding if compliance cannot be achieved.

**Floodplain Management:** The project site will be evaluated using the FEMA FIRMette map to determine if the site is within a flood plain. If the site is within a designated flood plain research will be conducted with consultation from HUD, the DNR, and/or other agencies. If the project is still not in compliance after consultation with the Flood Insurance requirements the project will not move forward.

**Historic Preservation:** A site will be reviewed using the county tax data to determine its age and whether it is 50 years or older to be eligible for historic designation. Research will also go into determining if the site is located in a designated historic site. If the project site does not fall into either of these then it is in compliance and no further determination is needed. If the site is 50 years or older, or in a historic site, then the Minnesota State Historic Preservation Office (SHPO) will be requested to make a determination on the site's eligibility as a historic site. If SHPO concludes the site is not eligible for historic designation or will not adversely affect nearby historic sites, the site will be in compliance. If SHPO requires additional measures, conditions, or design standards, we will work with SHPO, the developer, and other relevant agencies to comply with SHPO to be compliant. If any site is not able to meet compliance, they will not be eligible for funding.

**Noise Abatement and Control:** HUD's DNL Calculator will be used to review noise generators to ensure that the site is within acceptable noise levels, which is less than 65dB. Vehicle traffic will be evaluated using a 1,000 buffer. Train traffic will be evaluated using a 3,000 buffer. Air traffic will be evaluated using a 15-mile buffer. Noise will be considered depending on the project site activities. If the project includes single family rehabilitation, noise attenuation will be encouraged using the most "practicable" for existing single-family homes (one to four family properties), such as replacement of windows, doors, and insulation. If the DNL Calculator shows noise levels above 65 dB, the homeowner will be advised and will be encouraged to add windows and/or insulation to the project's scope, as funding allows.

**Wetlands Protection:** The U.S. Fish and Wildlife Service Wetland mapper will be used to identify where wetlands are and their proximity to the project site. A determination will be made about whether the project is in or near a wetland. If the project is determined to be in or near a wetland, the footprint of the structure will not be allowed to be increased and the paved areas on the property will not be allowed to be increased. The Fish and Wildlife Service, DNR or other relevant agencies will be consulted if necessary.

**Environmental Justice:** Environmental Justice will be addressed after all factors has been reviewed and completed. If there are issues, then the project is compliance. If there are issues, the specific factors will be re-evaluated, with further consultation with the relevant agencies and HUD.

## **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, Attn: Stefan Duarte Breen, 1400 City Hall Annex, 25 West Fourth Street, Saint Paul, MN 55102 or to [stefan.duarte.breen@ci.stpaul.mn.us](mailto:stefan.duarte.breen@ci.stpaul.mn.us). All comments received by July 3<sup>rd</sup>, 2026 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 Yasmine Robinson in her capacity as Planning Director and in her official capacity as Certifying Officer 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.

## **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 in accordance with the required procedures (24 CFR Part 58, Sec. 58.76) and shall be addressed to HUD via email at [CPDRROFMIN@hud.gov](mailto:CPDRROFMIN@hud.gov). Potential objectors should contact HUD to verify the actual last day of the objection period.

Certifying Officer:  
Yasmine Robinson,  
Planning Director  
[yasmine.robinson@ci.stpaul.mn.us](mailto:yasmine.robinson@ci.stpaul.mn.us)