

**NOTICE OF INTENT TO REQUEST RELEASE OF FUNDS
FOR TIERED PROJECTS AND PROGRAMS**

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City of Saint Paul
1300 City Hall Annex
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Saint Paul, Minnesota 55102
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On or about July 3rd, 2026, the City of Saint Paul will submit a request to HUD for the release of \$160,000 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 with a total project cost of \$160,000:

Tier 1 Broad Review Project/Program Title: Ramsey County Lead Window Replacement Program FY '25 - '26.

Purpose: Lead poisoning can cause permanent damage to the brain and many other organs and can result in reduced intelligence and behavioral problems. A large portion of children at risk are in families of low income and are living in older housing units with heavy concentrations of lead-based paint. The most common sources of childhood exposure to lead are deteriorated lead-based paint and lead-contaminated dust, and soil in the residential environment. This program will help protect children from exposure to lead. Ramsey County will enroll qualifying properties that will undergo lead hazard reduction activities following HUD's Window Replacement and Low Impact Stabilization Program guidelines. The primary focus of this program is to do lead hazard reduction work in units with children under six years of age.

Location: The City of Saint Paul, generally. Specific addresses will be assessed in the site-specific reviews.

Project/Program Description: Ramsey County will manage the rehabilitation activities of enrolled properties until lead-based paint clearance testing is completed and work has been performed in a satisfactory manner, including payment of contractors and collection of lien waivers. The program goal is to reduce the incidence of undue lead absorption of children living in Saint Paul. It is anticipated that the program will treat units for a total amount of \$160,000 using 2025 CDBG funding. The size of the units and extent of lead-based paint will have an impact on the total number of units remediated. **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 this program when addresses become known.**

Level of Environmental Review Citation: *24 CFR Part 58.35(a)(3)(i).*

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,

Contamination and Toxic Substances, Floodplain Management, Historic Preservation, Noise Abatement and Control, Environmental Justice.

Mitigation Measures/Conditions/Permits (if any):

Airport Hazards: To determine compliance with HUD's Airport Hazards requirements, which states that HUD-assisted projects must be at least 2,500ft from civilian airports and 15,000ft from military airports, the EO will utilize our City's GIS Environmental Review web-app. If the proposed project site is within 2,500ft of a civilian airport or within 15,000ft of a military airport, the EO will consult with our local HUD Field Environmental Officer to discuss mitigation. If after this consultation the site-specific project remains non-compliant with this regulation, the project will not move forward under this Tier I.

Flood Insurance: To determine whether or not the site-specific project is compliant with HUD's Flood Insurance requirements, consisting of the Flood Disaster Protection Act and National Flood Insurance Reform Act, the EO must determine its location relative to a floodplain. The EO will make their determination using a FEMA FIRMet map. They will consider the projected frequency of flooding the proposed project site may see and recommend the addition of a flood insurance policy if needed to maintain compliance. The EO will contact our local HUD Field Environmental Officer if they have additional concerns about compliance.

Contamination and Toxic Substances: To determine compliance with HUD's Contamination and Toxic Substances requirements, the proposed project site will be evaluated with the NEPAAssist GIS web app, and a 1/2-mile buffer will be employed to survey the surrounding area for contamination. Specifically, Superfund, Brownfield, on-site, and/or nearby sites of contamination will be analyzed. The EO will examine the data on NEPAAssist and the data on the Minnesota Pollution Control Agency's "What's in My Neighborhood" GIS web app to ensure they have the most complete and up-to-date information in making their compliance determination. If contaminated sites are found to pose a threat to the health of those involved with the project, the EO will consult with the local HUD Field Environmental Officer for mitigation steps. If there are no feasible ways to mitigate contamination, the project will not move forward due to non-compliance.

Floodplain Management: To determine whether or not the site-specific project is compliant with Executive Order 11988 (Floodplain Management), The EO must prove that the proposed project site is not on a floodplain, as defined in Title 44 CFR Part 9.4. The EO will make their determination using a FEMA FIRMet map. The EO will contact our local HUD Field Environmental Officer if they find that the proposed project will be on a floodplain. The project will not move forward if there are no feasible ways to mitigate the potentially damaging effects of developing on a wetland.

Historic Preservation: A site will be reviewed using the county tax data and/or City Historic Permit Index card 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 and/or district. 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 and/or district, 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 determines the site is eligible, and/or 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 the project is still not in compliance after consultation, the project will not move forward.

Noise Abatement and Control: Each site will be reviewed for noise generators including major roads within 1000 ft, major railroads within 3000 ft, and major airports within 15 miles. These noise generators will then be input to HUD's DNL calculator. If the DNL is greater than 65 DB, mitigation measures such as a StraCAT assessment and noise attenuation measures through window replacement will be considered. If 65 DB or lower cannot be achieved, the site-specific review will be cancelled.

Environmental Justice: Environmental Justice will be addressed after all factors have been reviewed and completed. If there is no negative environmental impact, we will record that in the record and proceed with the project. If there is a negative environmental impact, we will adjust the project to eliminate the negative impact or choose a new site. If nothing can be done, the site specific project will be canceled.

Estimated Project Cost: It is anticipated that the program will treat units for a total amount of \$160000 using 2025 CDBG funding.

The activity/activities proposed are categorically excluded under HUD regulations at 24 CFR Part 58 from National Environmental Policy Act (NEPA) requirements per 24 CFR Part 58.35(a)(3)(i). An Environmental Review Record (ERR) that documents the environmental determinations for this project is on file at the City of Saint Paul, 1400 City Hall Annex, 25 West 4th Street, Saint Paul, MN 55102 and will be made available for in-person viewing or copying from 8 AM through 12 PM and 1 PM and 4 PM on Wednesdays and Thursdays and electronically upon request to stefan.duarte-breen@ci.stpaul.mn.us.

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. All comments received by July 3rd, 2026 will be considered by the City of Saint Paul prior to authorizing submission of a request for release of funds.

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 and allows Ramsey County 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 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. 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