

**Environmental Assessment
Determination and Compliance Findings
24 CFR Part 58**

Name of Project: Milton Mobile Home Collaborative

GEARS Environmental Review (ENV) Identifier Number: ENV-2018-Milton-040

Date: July 12, 2019

Name of Person Preparing this Form: Kate Fournier

Name and Title of Responsible Entity Official: Don Turner, Jr, Town Manager

Name of Municipality (CDBG Funding): Town of Milton

Name of Subgrantee (CDBG Funding, if applicable): Milton Mobile Home Community

Name of Organization (HOME Funding):

NEPA Environmental Assessment Checklist

Evaluate the significance of the effects of the proposal on the character, features and resources of the project area. Enter relevant base data and verifiable source documentation to support the finding. For guidance please see the HUD Green Book and Environmental Assessment Questions for Guidance. Enter the appropriate impact code from the following list to make a determination of impact.

Impact Codes: (1) - No impact anticipated

(2) - Potentially beneficial

(3) - Potentially adverse

(4) - Requires mitigation

(5) - Requires project modification.

Note names, dates of contact, telephone numbers and page references. Attach additional material as appropriate. Note conditions or mitigation measures required. Any compliance documentation should be uploaded on the **Supporting Documents Form** in the GEARS Online Grants Management System.

For guidance see [Environmental Assessment Questions](#), [HUD's Green Book](#) and [HUD's Environmental Review Requirements](#).

Land Development	Code	Impact Evaluation and Source/Documentation
Conformance with Plans	2	2The Cooperative is an important source of housing in Milton. Assisting the residents with this project is in full congruence with the Consolidated Plan, retaining 100 affordable units within affordability to a low-income population.
Compatible Land Use and Zoning / Urban Impact	1	The Milton Mobile Home Cooperative already exists and there will be no change with the existing land use. Therefore, the project will be compatible with existing land use.
Scale & Urban / Environmental Design	1	Since the Milton Mobile Home Cooperative already exists, there will be no change in scale or urban/environmental design.
Slope	1	The subject property on the north side slopes steeply towards the riverine wetland (ravine). Otherwise, the site is flat. The slope is close to some mobile homes, and though not part of the current project, shoring of the slope is being considered in the future. Therefore, the subject property is suitable for new connections to the municipal water and sewer.
Erosion	1	Standard erosion control measures will be in place during construction activities..
Soil Suitability	1	Engineers have evaluated the soil at the subject property and have deemed it suitable for new connections to municipal water and sewer.
Storm Water Runoff / Drainage	1	Standard stormwater control measures will be in place during and after construction.
Hazards and Nuisances including Site Safety	2	There are no known hazards or nuisances that exist at the subject property, except the threat of water contamination from the failing septic systems.
Noise - Contribution to Community Noise Levels	1	The proposed project will not contribute to community noise levels, except temporarily during the construction phase. The day night noise level at the subject property is 68.3 slightly above HUD's maximum threshold for noise. However, this calculation is based on the closest mobile home to US 7 and, given the project activities, this regulation is not triggered.
Energy Consumption	1	Energy consumption on site will remain unchanged since the project activities include water and septic connection, as well as roadway repair.

Air Quality -Effects of Ambient Air Quality on Project and Contribution to Community Pollution Levels	1	The property, and all of Vermont, is located in an attainment zone. The project will not contribute significantly to community air pollution levels during construction activities.
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Socioeconomic	Code	Impact Evaluation and Source/Documentation
Demographic / Community Character Changes	1	Since the proposed project includes improving water line and septic efficiency of an already operating park, the proposed development will not result in significant changes in the character or demographics of the community.
Displacement	1	Since this project only includes connection to municipal water and septic, as well as roadway repair, displacement will not occur.
Employment and Income Patterns	1	A small number of employment opportunities will likely result from the project's activities, temporarily during the construction period.

Community Facilities and Services	Code	Impact Evaluation and Source/Documentation
Educational Facilities	1	Given the project activities, there is no anticipated impact to the educational facilities in the Milton area.
Commercial Facilities	1	The proposed project is located just outside Cozy Corner, where ample commercial facilities exist.
Health Care	1	The UVM Medical Center is located approximately 14.2 miles from the subject property and will not be overburdened by this project.
Social Services	2	Some social services exist in the Milton area and a greater number of services are provided in the greater Burlington area, approximately 10 miles from the subject property.
Solid Waste Disposal / Recycling	1	The proposed project will have solid waste and recycling collected via curbside pickup.
Waste Water / Sanitary Sewers	2	Current systems are failing and are in need of replacement. The project will connect to the municipal system for final treatment and discharge and the design has already been approved and permitted (State Waste Water Permit 4-1679-17).
Water Supply	2	The water for this subject property will be supplied by the Town of Milton. There is no modification proposed to the existing flows or allocations from this Town water supply, only improvement of the water distribution system.
Public Safety - Police - Fire - Emergency Medical	1	The Town of Milton Police Department is located approximately 0.7 miles from the subject property. The Town of Milton Fire Department is located just 0.8 miles from the subject property. The Milton Rescue Service is also located approximately 0.7 miles from the subject property. The subject property will be easily accessible by emergency personnel.
Open Space and Recreation - Open Space - Parks & Recreation - Cultural Facilities	1	A portion of the 18 acre site includes a wooded area and the subject property is located amidst larger tracts of wooded lands. The subject property is within five miles of the Milton Town Forest, Niquette Bay State Park, and Sand Bar Waterfowl Management Area. The closest park, less than one mile from the site, is Bombardier Park West which offers recreational activities. The Town of Milton is located in Chittenden County which is the cultural and economic center of Vermont. The proposed project will not impact the cultural facilities.
Transportation and Accessibility	2	After the septic and water lines are replaced, the roadways that were damaged due to the work will be replaced. The subject property will be easily accessible by emergency personnel.

Natural Features	Code	Impact Evaluation and Source/Documentation
Water Resources (Groundwater / Surface Water)	2	The majority of the subject property is at the edge of the Lamoille River valley and a ravine which becomes a tributary to the Lamoille River exists on the northern side of the property. Replacing the failing septic systems with connection to the municipal septic system will reduce the potential for contamination of groundwater.
Unique Natural Features	1	No unique natural features are present on the subject property or will be impacted as a result of this proposed project.
Vegetation and Wildlife	1	A portion of the 18 acre site includes a wooded area and the subject property is located amidst larger tracts of wooded lands. The subject property is within five miles of the Milton Town Forest, Niquette Bay State Park, and Sand Bar Waterfowl Management Area. The closest park, less than one mile from the site, is Bombardier Park West which offers recreational activities. No special vegetation or wildlife are anticipated to be impacted by this proposed project.

Environmental Assessment and Compliance Findings

Name of Project: Milton Mobile Home Collaborative

Statutory Checklist Directions: Once the review process for each compliance factor has been completed, the Statutory Checklist must then be filled out. Specifically, the response must indicate whether the activity does or does not affect the resources under consideration. For guidance on the Statutes, Executive Orders, and Regulations please see [Related Federal Laws and Authorities](#) (on the HUD Exchange). For addition guidance see the [Environmental Review Compliance Guidance and Statutory Checklist Requirements](#) (on the Agency's website). Document the determination made and the sources used. Any compliance documentation should be uploaded on the Supporting Documents page in the GEARS.

Statutes, Executive Orders, and Regulations listed at 24 CFR § 58.5	Mitigation Required?		Analysis of Source Documentation
	Yes	No	
Historic Preservation [36 CFR Part 800]	☐	☒	A Phase I archaeological investigation was required as recommended in an Archeological Resource Assessment (ARA) performed at the site. The Phase I End of Field (EOF) Letter determined that no pre-contact Native American sites or Euroamerican sites were identified and no archeological work is recommended. Sources: Preliminary Intake Form; ARA; EOF with concurrence dated June 25, 2019.
Floodplain Management [Executive Order 11988; 24 CFR Part 55]	☐	☒	The subject property does not include 100-year floodplain and no floodplains will be impacted by the project activities. Source: FIRM Panel 50007C0044D, dated July 18, 2011.
Wetland Protection [Executive Order 11990; 3 CFR, §§ 2, 5]	☐	☒	There are no federally mapped or other wetlands found on or adjacent to the subject property, except a small portion of riverine in the base of the ravine found on the northeastern portion of the subject property, well outside the area of disturbance. No wetlands will be impacted by the project activities and compliance has been achieved. Source: USFWS Wetlands Mapper.
Coastal Zone Management Act [16 U.S.C. 1451, §§ 307(c), (d)]	NA – Vermont does not lie within a coastal zone		
Sole Source Aquifers [40 CFR Part 149]	NA – Vermont has no designated sole source aquifers according to the Environmental Protection Agency		

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Endangered Species Act [50 CFR Part 402]	☐	☒	There is one federally listed threatened or endangered species (the northern long-eared bat) found within the vicinity of the subject property but no trees will be removed and there is no anticipated impact to this species. State biologists had no concerns for this project. Source: USFWS Official Species List; email coordination with state biologists.
Wild and Scenic Rivers Act [16 U.S.C. 1271, §§ 7(b), (c)]	☐	☒	The subject property is not near and will not impact any wild and scenic rivers or nationwide rivers. Source: NPS Wild and Scenic River Map and Nationwide Rivers Inventory Map.
Air Quality [Clean Air Act, Sections 176 (c) and (d), and 40 CFR Parts 6, 51, 93]	NA – All of Vermont is currently designated as an Attainment Area for all National Ambient Air Quality Standard per the Environmental Protection Agency (EPA).		
Farmland Protection [7 CFR Part 658]	☐	☒	The subject property is mapped as an urbanized area and therefore compliance has been achieved. Source: US Census Bureau Urban Areas map.
Explosive and Flammable Hazards [24 CFR Part 51, Subpart C]	☐	☒	There are several 100-gallon propane ASTs on the subject property but these tanks are not subject to this regulation and compliance has been achieved. Source: SRW's Thermal/Explosive Map.
Noise [24 CFR Part 51, Subpart B]	☐	☒	The estimated combined day night noise level is 68.8 which is higher than the acceptable level of 65 decibels. However, this is based on the nearest mobile home and, due to the project activities, this regulation is not triggered and compliance has been achieved. Source: HUD DNL Calculator; VTRANS 2017 Automatic Vehicle Classification Report; distance maps.

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Statutes, Executive Orders, and Regulations listed at 24 CFR § 58.5	<u>Mitigation Required?</u>		Analysis of Source Documentation
	Yes	No	
Toxic Sites [24 CFR Part 58.5(i)(2)]	☐	☒	According to SRW's Phase I Environmental Site Assessment, there are no recognized environmental conditions or vapor encroachment conditions present at the subject property. Source: SRW Phase I ESA update, dated July 8, 2019; SRW Phase I ESA, December 16, 2018.
Environmental Justice [Executive Order 12898]	☐	☒	The project activity will not negatively impact low income or minority populations. According to the EJ Screen Report, the minority population is 4% and the low income population is 17% within 1-mile of the subject property. Source: EPA EJ Screen Report.
Radon	☐	☒	Due to the project activities, radon testing and mitigation are not required by HUD.

Statutes, Executive Orders, and Regulations listed at 24 CFR § 58.6	<u>Mitigation Required?</u>		Analysis of Source Documentation
	Yes	No	
Flood Insurance [24 CFR Part 58.6(a), Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 42 USC 4001-4128 and 42 USC 5154a]	☐	☒	The subject property is not located in the 100-year floodplain and therefore flood insurance is not required. Source: FIRM Map Number 50007C0044D, dated July 18, 2011.
Coastal Barrier Resources [Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 16 U.S.C. 3501 et seq.]	NA – Vermont does not lie within a coastal zone		
Airport Clear Zones / Hazards [24 CFR Part 51, Subpart D]	☐	☒	The closest civilian airport or military airfield are the Burlington International Airport and VT Air National Guard at 10 miles from the subject property, well outside of the 2,500 feet APZ area. Source: SRW Airport Clear Zones Map.

Summary of Findings and Conclusions

Additional Studies Performed

Phase I ESA, Phase I ESA Update, ARA, Phase 1B.

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

Only list those that are not already listed in the Sources column on the Supporting Documentation page in GEARS.

Town of Milton 2018 Comprehensive Plan
Preliminary Engineering Report, prepared by Trudell Consulting Engineers

List of Permits Obtained

No ER related permits were required, other than the State wastewater permit (WW-4-1679-17).

ALTERNATIVES TO THE PROPOSED ACTION

Alternatives and Project Modifications Considered [24 CFR 58.40(e), Ref. 40 CFR 1508.9]

Identify other reasonable courses of action that were considered and not selected, such as other sites, design modifications, or other uses of the subject site. Describe the benefits and adverse impacts to the human environment of each alternative and the reasons for rejecting it.

Several alternatives were considered. One alternative considered was to include natural gas installation but this alternative was deemed too costly and was rejected. A second alternative considered was to continue on-site wastewater and not install the municipal style sewer collection system but this was determined to be costly and inefficient.

No Action Alternative [24 CFR 58.40(e)]

Discuss the benefits and adverse impacts to the human environment of not implementing the preferred alternative.

If the preferred alternative was not implemented, the septic systems would continue to fail and eventually the water lines would fail, too. Failing septic systems are costly and pose an environmental threat to the environment and human health.

Mitigation Measures and Conditions [24 CFR 58.40(d), 40 CFR 1508.20]

Recommend feasible ways in which the proposal or its external factors should be modified in order to minimize adverse environmental impacts and restore or enhance environmental quality.

No mitigation measures and conditions.

Determination:

☒ **Finding of No Significant Impact** [24 CFR 58.40(g)(1); 40 CFR 1508.27]
The project will not result in a significant impact on the quality of the human environment.

☐ **Finding of Significant Impact** [24 CFR 58.40(g)(2); 40 CFR 1508.27]

The project may significantly affect the quality of the human environment.

PREPARER SIGNATURE: _____

A handwritten signature in black ink, appearing to be "K. Lee", written over a horizontal line.

DATE: _____

July 12, 2019